

**State of Alaska Comments – Pebble Project Preliminary Draft EIS, Section 3.2 – Land Ownership, Management, & Use**

Agency	Comment No.	Section, Paragraph, and Page #	Cooperating Agency Comment (and Purpose of Comment)	Proposed Resolution (Additions or Deletion of Text)	Response
DNR/DM LW/ RADS	1	3.2.2.2	Nushagak and Mulchatna Rivers Recreation Plan. The plan states that the Nushagak and Mulchatna Rivers Recreation Plan is superseded by the management intent of the 2013 Bristol Bay Area Plan revision (BBAP). However, on page 4-17 of the revised BBAP it states: "The Nushagak & Mulchatna Rivers Recreation Plan (RRMP) was developed by DNR and other entities to provide the basis for the management of recreation uses and structures on state land within the Nushagak and Mulchatna drainage basin... <b>This plan revision continues the use of the RRMP as an element of the BBAP</b> within the navigable waters of the Nushagak-Mulchatna drainage basin and those adjacent uplands designated as General Use (Gu), Public Recreation and Tourism dispersed (Rd), Public Recreation and Tourism Use Site (Rp), or (with these designations) co-designated Habitat for specific types of recreation activities and facilities.	Please correct the language in Section 3.2.2.2 with the language provided in the revised BBAP (Page 4-17), that states the RRMP's use is continued as an element of the BBAP. The RRMP has not been superseded.	Text was corrected to state that "This plan is continued as an element of the Bristol Bay Area Plan 2013 revision within the navigable waters of the Nushagak-Mulchatna drainage basin."

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ADF&G/ Wildlife/ Refuge	2	Sec 3.2.2.2	<p>"The proposed natural gas pipeline and Amakdedori port would be within 2 miles of the boundary of (but would not occupy) the McNeil River State Game Refuge and Sanctuary, which is managed by the ADF&amp;G in accordance with the McNeil River State Game Refuge and Sanctuary Management Plan (ADF&amp;G 2008)."</p> <p>The proposed port site and gas pipeline landfall are about 2 miles from the MRSG Refuge border. However, the road corridor and collocated pipeline also run adjacent to the northern edge of the MRSG Refuge border. In this area the road and pipeline are within 1 mile and skirts the Refuge boundary at less than a 1,500 feet in a number of locations and only about 250 feet at its closest point.</p>	Accurately depict the project feature locations in relation to the McNeil River State Game Refuge and McNeil River State Game Sanctuary.	Text edited to note the proximity of the port access road to the McNeil River State Game Refuge and Sanctuary.
ADF&G/ Comm. Fish/ Homer	3	3.2.2.1	Narrative under the NOAA section incorrectly states that the Kachemak Bay National Estuarine Research Reserve (NERR) is a state/federal partnership between NOAA and ADF&G. That was originally the case, but no longer. The State partner is now the University of Alaska (not ADF&G).	Revise paragraph for accuracy. More information can be found at <a href="http://accs.uaa.alaska.edu/kbnerr/">http://accs.uaa.alaska.edu/kbnerr/</a>	Text updated to reflect partnership with the University of Alaska; the reference was also changed.

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ADF&G/ Comm. Fish/ Homer	4	3.2.2.3	Kenai Peninsula Borough (KPB) section states that the KPB regulates floodplain development near certain anadromous streams, including Amakdedori Creek, adjacent to the port site.	KPB Comprehensive Plan should be reviewed to see how the referenced regulations addressing development near anadromous streams would affect constructing large fuel storage tanks adjacent to Amakdedori Creek.	The KPB municipal code (21.18 Anadromous Waters Habitat Protection) states that “that fuel storage and significant removal of vegetation within the 100-year floodplain along the anadromous waters require regulation to protect the salmon habitat.”  No text was added to the document.