



IN REPLY REFER TO:

United States Department of the Interior

KENAI NATIONAL WILDLIFE REFUGE

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KENAI NATIONAL WILDLIFE REFUGE EVALUATION OF THE EFFECTS ON SUBSISTENCE USES AND NEEDS (ANILCA SECTION 810 EVALUATION)

The U.S. Fish and Wildlife Service, acting for the Secretary of the Interior, is required by Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) to evaluate the effects on subsistence uses and needs in determining whether to withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands on national wildlife refuges in Alaska. The evaluation of effects of this proposed action/use on subsistence uses and needs is documented below. If this evaluation concludes with a finding that the proposed action would result in significant restriction to subsistence uses and needs, and we wish to proceed, we must initiate further procedural requirements of Section 810.

PROPOSED ACTION/USE: This evaluation examines the preferred alternative of the March 2005 Environmental Assessment for the Swanson River Natural Gas Storage Project. The project includes the expansion of natural gas storage by Union Oil Company of California (Unocal) within the Swanson River Oil and Gas Field of Kenai National Wildlife Refuge. The Swanson River Field has experienced oil and gas commercial activities since 1957. Gas injection and/or storage has historically occurred in the Swanson River Field; however, the current proposal is considered a new use because the storage project will include the storage of gas produced from outside the lease area and will focus on making deliverability of gas to the South-central Alaska service area more dependable. This activity is within the discretionary permitting authority of the Secretary, but is not a production activity guaranteed to the Field operator. Unocal proposes to expand the Field's gas storage capabilities using existing roads, pad, and pipeline corridors. The proposal will not expand the development footprint within the Refuge nor extend industrial occupation and use beyond the normal production life of the Field.

EVALUATION:

1. Subsistence Resources, Uses and Needs in the Affected Area

Subsistence use has differing interpretations depending on the various authorities and associated definitions. For example, subsistence use of natural resources on federal lands by qualified rural residents within Alaska is a priority use protected under provisions of Title VIII of ANILCA. The State of Alaska also considers all Alaska residents as qualified subsistence users of fish and game within the State. For the purpose of this

determination, the definition of subsistence users and resources is applied only to those uses commonly accepted under Title VIII of ANILCA.

Subsistence use has occurred on the Kenai Peninsula, and what is now Kenai National Wildlife Refuge, for thousands of years. Evidence from archaeological investigations demonstrate that both Indian and Eskimo cultures existed in the area for extended periods, utilizing the abundant fish, game, and vegetation resources for their survival. Early Russian and American miners, fur trappers, traders, and others settled the area in the late 18th, 19th, or early 20th century. Subsistence use of natural resources was commonly practiced during this period as well, and was largely responsible for the survival of many early settlers on the Kenai Peninsula. As the area grew in population and urban infrastructure of the 20th century, subsistence lifestyles were altered but still practiced in some form in many areas. Important resources included salmon, trout, char, moose, bear, caribou, ptarmigan, grouse, ducks, sheep and goats, as well as berries, firewood, shellfish, furbearers, and other natural resources. While interest in harvesting all of these resources still exists, primary interest today focuses on moose and salmon. Federal subsistence regulations for the Kenai area currently provide for a preferential moose hunt for qualified rural residents living in Ninilchik, Nanwalek, Port Graham, and Seldovia. Harvest from this special season has resulted in no more than a few moose each year in recent years, and no known harvest has occurred within the proposed project area. A small harvest of black bears also occurs by residents of Port Graham and Nanwalek under a preferential federal season but at considerable distance from the proposed project area. Subsistence fishing opportunity exists in the area for all qualified rural residents in Alaska; however, harvest must be in accordance with State of Alaska seasons, bag limits, and methods restrictions. Currently, little subsistence fishing is reported under the federal subsistence regulations anywhere within the Refuge.

2. Concerns Expressed by Potentially Affected Subsistence Users and or the State

A public comment period on the proposed project for completing a Refuge compatibility determination resulted in seven sets of comments. No subsistence related comments were received.

3. Effects of the Proposed Action or Use on Subsistence Uses and Needs

The proposed action will have no noticeable impact on the current use and activity level within the Swanson River Oil and Gas Field. No development outside of the existing industrial footprint will be permitted, the project will not extend the life of the Field, no new pressure regimes will be introduced that may impact safety in the area, and no new personnel will be required to operate the gas storage functions of the Field.

4. Availability of Other Lands for the Purposes Sought to be Achieved

The depleted reservoirs within the Swanson River Oil and Gas Field subsurface estate have been determined to be ideal to meet the needs for natural gas storage. While other

such areas may exist, there are no other proven areas to meet this need that are currently known.

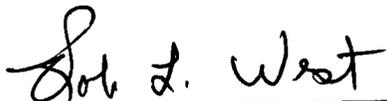
5. Other Alternatives Which Would Reduce or Eliminate Use of Public Lands Needs for Subsistence Purposes

Alternative gas storage locations may exist and other alternatives to gas storage could be pursued, such as increasing exploration and development of new natural gas reservoirs. Public concern over gas deliverability during peak use periods warrants a timely solution to the problem. The development of the Swanson River Gas Storage Project may not be the only or best solution to the problem but it is the only proposal that has been made to date; has been endorsed by utilities, local and State government, and industry; and is being proposed in an environmentally friendly manner with no known substantial new impacts to result from the project.

FINDING: The proposed action would not result in a significant restriction to subsistence uses and needs on Kenai National Wildlife Refuge.

AGENCY DECISION: The proposed action may be implemented without additional procedural requirements relative to Section 810 of ANILCA.

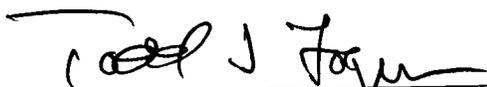
SIGNATURES:



Refuge Manager

3-21-05

Date



Regional Chief, National Wildlife Refuge System

3/31/05

Date