



# KENAI PENINSULA BOROUGH

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JOHN J. WILLIAMS  
MAYOR

February 24, 2006

Ms. Nicole Allison, Project Review Coordinator  
Alaska Department of Natural Resources  
Office of Project Management and Permitting  
550 West 7<sup>th</sup> Avenue, Suite 1660  
Anchorage, Alaska 99501

Subject: Kenai Municipal Airport Improvements, State ID AK 0602-03AA

Dear Ms. Allison:

Kenai Peninsula Borough Coastal Management Plan (KPBCMP) staff received a project proposal for review submitted by the City of Kenai to the Alaska Coastal Management Program (ACMP) seeking a consistency determination for improvements to the Kenai Municipal Airport that will impact approximately 39 acres of wetlands. Based on our review of the project, we offer the following comments.

## Project Description

The City of Kenai, in cooperation with the Federal Aviation Administration (FAA), proposes to initiate a multi-phased improvement project at the Kenai Municipal Airport during years 2006 – 2008. The improvements are intended to bring the Airport into compliance with current FAA safety and design standards and to meet current and future needs of the Airport. Additionally, more aircraft parking on the runway apron and access to lease lots will be developed. The Airport serves scheduled commercial air service, air taxi, air cargo, general aviation and state military and firefighting operations. The project is located in Sections 21, 28, 29 and 32 of Township 6 North, Range 11 West, Seward Meridian.

## Project Discussion

The project subject to this review calls for the excavation and discharge of approximately 200,000 cubic yards of silt and 35,000 cubic yards of sand into 11.7 acres of wetlands to extend and widen the water runway 1W-19W. The project plans call for the excavation

of approximately 3,000 cubic yards of silt and backfilling with approximately 50,000 cubic yards of fill into approximately 14.7 acres of wetlands for the construction of an emergency access and maintenance road. Another phase of the project calls for the excavation of approximately 53,000 cubic yards of silt and 15,000 cubic yards of sand, the placement of approximately 40,000 cubic yards of sand and gravel into 4.8 acres of wetlands to improve the runway safety areas and reconstruct runway 1L-19R and the placement of 30,000 cubic yards of sand and gravel into 7.7 acres of wetland to provide access to lease lots on runway 1R-19R.

## Findings

Under enforceable policy 2.4, Dredging and Filling, the KPCZMP requires that dredging and filling in wetlands shall avoid significant impacts to important fish and wildlife habitat; limit the area of disturbance to as small an area as possible; minimize sediment flowing away from the dredge site and maintain the circulation and drainage patterns in the area of the fill. The design characteristics incorporated in the proposed development (subject to considerations below associated with policy 2.6) appear to be sufficient to minimize significant impacts to important wildlife habitat and the areas of direct disturbance have been minimized. With the implementation of the project as designed the project will be consistent with policy 2.4.

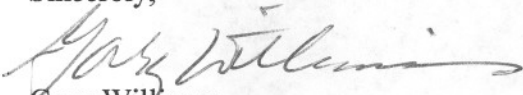
Enforceable policy 2.5, Disposal of Dredged Material, requires that disposal of dredged materials will be diked or similarly contained and stabilized to prevent erosion or leaching into adjacent wetlands. The project engineer on behalf of the City of Kenai has developed an Erosion, Sediment and Dust Control Plan that will be incorporated in the project contractor's Storm Water Pollution and Dust Prevention Plan and will require Best Management Practices in planning, providing, inspecting and maintaining control of erosion, sedimentation, water pollution, dust and hazardous materials contamination during construction. With the implementation of these plans the project will be consistent with policy 2.4.

Enforceable policy, 2.6, Mitigation, the Kenai Peninsula Borough Coastal Management Program requires developments in wetlands to mitigate potential adverse impact to fish and wildlife populations and habitat. As mitigation for the placement of fill in a drainage way as part of the construction of access to lease lots adjacent to runway 1R – 19L, the City of Kenai proposes to create an engineered swale in an upland area to facilitate the drainage of water from the north section of the project along Marathon Road and connect to the existing drainage way to the south of the project. The swale is estimated to mitigate for the lost of 7.7 acres of wetlands. In addition, the City of Kenai and the FAA have offered to pay an in-lieu fee amounting to \$1,000 per acre as mitigation for the loss of the remaining 30 acres of filled wetlands. The mitigation funds are proposed to be deposited to the Kenai Watershed Forum to address wetlands issues in the Kenai area. With the implementation of these mitigating measures the project will be consistent with policy 2.6.

Enforceable policy, 2.7 Cumulative Impacts, requires that cumulative impacts of proposed new development on ambient air, water quality and coastal habitats shall be considered in the review or renewal of coastal projects. Based on the proposed project's scope of work we do not find ample consideration of the cumulative impacts of additional hardened surfaces and potential increase in run-off of pollutants from the site into adjacent wetlands and drainages. Therefore, we recommend that as a provision of state and federal permits to dredge and fill in connection with this project, a means for monitoring the discharge of pollutants into adjacent wetlands and waterways that drain into important habitat be required. With the inclusion of this provision the project will be consistent with this policy.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Williams", written in black ink.

Gary Williams

Coastal Management Program Coordinator