

May 17, 2006

Nicole Allison, Project Review Coordinator
Office of Project Management and Permitting
Alaska Coastal Zone Management Program
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501

Subject: Kenai Lake Work Center Improvement Project AK 0605-01AA

Dear Ms. Allison:

Kenai Peninsula Borough Coastal Management Program staff reviewed the subject project to determine conformance with enforceable policies. This project review is concerned with activity that may occur within the 100-year floodplain in the Chugach National Forest near Kenai Lake.

The scope of the project covered by Kenai Peninsula Borough Coastal Management Policy (KPBCZMP) is the siting of a 2000-gallon gasoline and 200-gallon diesel, above-ground storage tank associated with the improvement project. The petroleum products, according to the applicant's statement of work, will be stored 540 feet from Kenai Lake.

Enforceable Policy 13.2.a., Storage of Petroleum and Petroleum Products, requires, to the extent feasible and prudent, facilities for the storage of petroleum products exceeding 660 gallons capacity shall not be sited within the 100-year floodplain. Based on a review of FEMA Flood Insurance Rate Map, Panel #020012-2525A, a significant portion of the area planned for the improvement project is within the 100-year floodplain. As an alternative measure, to the extent feasible and prudent, the 2000-gallon gasoline tank must be located above the FEMA delineated 100-year floodplain.

Enforceable Policy 13.2.c., requires all stored petroleum products to be sited within an impermeable berm and basin capable of retaining 110 percent of storage capacity plus 12 inches of free board to minimize the potential for uncontained spills or leaks. As an alternative measure such containment must be provided for the gasoline and diesel tanks.

With the implementation of these alternative measures, the project will be consistent with the Kenai Peninsula Borough Coastal Management Program's enforceable policies.

Thank you for the opportunity to comment.

Sincerely,

Gary Williams
Coastal District Coordinator