

May 8, 2006

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

Subject: USDA Forest Service, Whistle Stop Project - AK 0604-04AA

Dear Ms. Allison:

Kenai Peninsula Borough Coastal Management Program staff reviewed the above noted project to determine conformance with enforceable policies. Relevant Kenai Peninsula Borough Enforceable Policies (KPBEF) concern development within floodways and flood plains, in important fish and wildlife habitat and in historic and pre-historic areas.

#### Project Description

The purpose of this development is to create up to six backcountry “Whistle Stops” that the public may use to access remote areas in federally managed lands via Alaska Railroad trains.

The USDA Forest Service plans to build recreational facilities within the Placer River Valley and Trail Creek Valley 100 year floodplain. KPBEF 3.2, Floodway and Floodplain Development, requires development, including bridges and culverts, to be constructed within the floodplain with design characteristics that maintain the flow of water with no increase to base flood levels. USDA Forest Service construction plans call for boardwalks to be built in areas with frequent flood events with disturbance to vegetation limited to boardwalk foundation placement. Bridges will be constructed to permit passage of water borne debris and boat traffic. Activity carried out in this activity will comply with USDA Best Management Practices as described in the Soil and Water Conservation Handbook – FSH 2509.22

The project will require stream crossings where aquatic species are present. KPBEF 12.3, Fish Passage, requires development activities, facilities and structures to be designed, sited and constructed in a manner that does not impede or interfere with fish passage. The USDA Forest Service plans mitigation measures to protect such species and

the riparian zone through the implementation of Best Management Practices as described in the Soil and Water Conservation Handbook – FSH 2509.22 and the Aquatic Habitat Management Handbook – FSH 2090.21. Additionally, hydrologists and aquatic biologists will provide consultation during project construction to minimize the impact of trail building.

Construction activities in connection with this project will occur in historical and prehistoric areas. KPBEF 14.1, Historical and Prehistory Sites, calls for projects in which such sites are present to be reviewed by the Department of Natural Resources, Office of History and Archaeology. This project was reviewed by the DNR during the development of the project Environmental Impact Statement. The project will utilize heritage resource specialists to monitor all activities with 100 feet of a known cultural site. Any heritage artifacts or sites located during the project will not be disturbed and work will be stopped pending consultation with heritage resource specialists and mitigation procedures have been carried out in accordance with the Region 10 Programmatic Agreement.

The project, as planned, 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