



## KENAI PENINSULA BOROUGH

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JOHN J. WILLIAMS  
MAYOR

August 14, 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 Lake Bank Restoration AK 0606-06AA

Dear Ms. Allison:

Kenai Peninsula Borough Coastal Management Plan (KPBCMP) staff received a project proposal for review submitted by the Alaska Railroad Corporation (ARRC). Based on our review of the project, we offer the following comments.

### Project Description

The ARRC seeks to stabilize lakeshore areas adjacent to railroad tracks running parallel to Kenai Lake. The total length of the work areas, combined, is 5,100 feet with approximately 0.2 cubic yards of fill placed below the ordinary high water line per linear foot of fill. The ARRC proposes to use approximately 1,200 cubic yards of Class II riprap, some large rock, fill, topsoil and revegetation techniques in its bank restoration project.

This project is located within sections 25, 36, Township 4 N, Range 1 W, and Section 31, Township 4 N, Range 1 E, and sections 6,7, and 18, Township 3 N, Range 1 E, Seward Meridian.

### Project Discussion

The area proposed for stabilization is subject to erosion from wave forces from Kenai Lake. Erosion along an approximately 3-mile stretch from railroad Milepost 20 to 23.1 has been a perennial problem for the ARRC and during periods of heavy wave action has threatened the integrity of the railroad bed. Methods of coping with this hazard in the past have caused the ARRC to apply for emergency permits to dump rock into the lake

without the benefit of time to properly construct each restoration project. With this project request the ARRC seeks a long term permit to perform restoration according to methods designed to extend the life of each restoration and minimize negative impacts to habitat.

The ARRC proposes a variety of restoration techniques with specific designs for each location where restoration work will occur.

### Findings

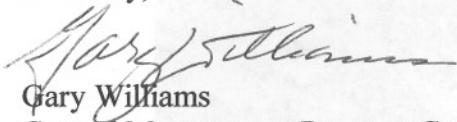
The Kenai Peninsula Borough Coastal Management Program is supportive of the ARRC's objective of responding to restoration projects in sensitive habitats with well-planned and well-executed work. The physical location of the project limits the ARRC's options to employ the array of restoration techniques that are typically available under a less restricted footprint. Kenai Peninsula Borough Coastal Zone Management policy 12.4, Bank Stabilization, supports activity to prevent erosion and sedimentation in sensitive habitats provided the work provides irregular bank contours and reduction in nearshore water velocities.

Kenai Peninsula Borough Coastal Zone Management (KPBCZM) policy 2.6, Mitigation, and 5.4, Habitat Protection, requires that all land and water use activities shall be planned and conducted to mitigate potential adverse impacts on fish and wildlife populations, habitats and harvest activities, and keep the area of disturbance to the minimum area necessary. The sequence of mitigation calls for avoidance first and when loss cannot be avoided, to minimize the degree of loss. The ARRC plans to utilize a variety of techniques including using a combination of riprap and vegetation to minimize the loss and, in some instances, increase riparian habitat values.

Provided the ARRC conducts the restoration work according to Best Management Practices to minimize the area disturbed and minimize negative wildlife habitat impacts, the project will be consistent with the policies cited above.

Thank you for the opportunity to comment.

Sincerely,



Gary Williams  
Coastal Management Program Coordinator