



KENAI PENINSULA BOROUGH

Coastal Management Program

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**JOHN J. WILLIAMS
BOROUGH MAYOR**

September 16, 2007

Ms. Alexis Finn, Project Review Coordinator
Alaska Department of Natural Resources
Office of Project Management and Permitting
550 West 7th Avenue, Suite 705
Anchorage, Alaska 99501

Subject: RFAI Kalifornsky Beach Road Rehabilitation, MP 0 –16 AK 0708-14AA

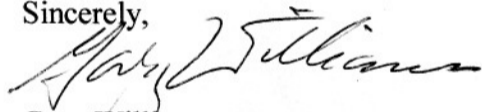
Dear Ms. Finn:

The above referenced project will widen the Kalifornsky Beach Road surface and among other activities the applicant proposes to replace undersized culverts at MP 0.8 and MP 15.3 to support improved fish passage. The scope of this project calls for repaving a section of the road at approximately MP 2.5 at which point the road crosses Coal Creek. This is a catalogued anadromous stream (244-30-10050-2015). The culvert at this location is perched by more than 12 inches during summer and impedes the passage of Chinook, Coho, pink salmon and resident species. This stream is one of three documented anadromous fish tributaries to the main stem of Kasilof River. The perched culvert blocks some 5.7 miles of spawning habitat. The Alaska Department of Fish and Game, the Office of Habitat Management and Permitting, the U.S. Fish and Wildlife Service and the Kenai Watershed Forum have ranked replacement of this perched culvert among their highest priorities.

The applicant acknowledges and addresses the need for culvert replacement and MP 0.8 and MP 15.3 to support fish passage in its evaluation of Kenai Peninsula Borough Coastal Zone Program (KPBCZMP) policies but does not address a more substantive similar problem at MP 2.5 at Coal Creek. Furthermore, the applicant does not address this matter in its evaluation of the Statewide Standards of the Alaska Coastal Management Program at 11 ACC 112.300 (b)(8)(A), which states, "rivers, streams, and lakes must be managed to avoid, minimize, or mitigate significant adverse impacts to natural water flow...". Within the language of 11 ACC 112.300(c) this stream is designated important habitat. Additionally, Alaska Statute (AS) 41.14.840 requires culverts to be maintained and supplied with sufficient water to permit free fish passage. Finally, Kenai Peninsula Borough Coastal Management Policy 12.3, Fish Passage requires that to achieve consistency "development activities, facilities and structures shall be designed, sited, constructed and operated in a manner which does not impede or interfere with timely access and movement of fish... Existing fish passage problems, including perched culverts... shall be corrected by the entity responsible for the problem."

The KPBCZMP requests the applicant to address this issue in its evaluation of KPBCMP policy 12.3, the Statewide Standards of the Alaska Coastal Management Program and Alaska Statute 41.14.840.

Sincerely,



Gary Williams

Kenai Peninsula Borough

Coastal District Coordinator