



KENAI PENINSULA BOROUGH

Coastal Management Program

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**JOHN J. WILLIAMS
BOROUGH MAYOR**

March 16, 2007

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

Subject: Kenai Keys Canal Dredging, AK 0702-13AA

Dear Ms. Allison:

Kenai Peninsula Borough (KPB) Coastal District staff reviewed the above referenced project for consistency with KPB Coastal Management Program enforceable policies. This project seeks a consistency determination for dredging the Kenai Keys canal system located in the Kenai Keys Subdivision in Section 35, Township 5N, Range 8W, Seward Meridian.

Scope of the Project

The applicant, Kenai River Keys Property Owners Association, proposes to dredge approximately 5,775 linear feet of canals within the subdivision to remove an, as yet, undetermined amount of material. Work will occur in the spring during low-water conditions.

The dredging plan includes removing organic debris starting at the head of the canal and proceeding mouth-ward, shaping the canal so that there will be no fish entrapment points. Dredging equipment will enter and exist each canal at existing boat launch sites and is proposed to be accomplished with a track-hoe or bulldozer. Material will be removed from the dredge site and hauled to an upland location. The erosion control plan consists of silt dams and related methods, as necessary, to prevent transport of silt into any active flowing part of the Kenai River.

Applicable Policy

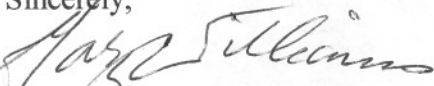
- 1) Kenai Peninsula Borough Enforceable Policy 2.4, Dredging and Filling, requires that dredging or filling in streams and rivers will be located, designed, constructed and maintained in a manner so as to:
 - a. avoid significant impacts to important fish and wildlife habitat;

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- b. avoid significant interference with fish migration, spawning and rearing;
 - c. limit the areas of direct disturbance to as small an areas as possible;
 - d. minimize the escapement of waterborne sediment traveling away from the dredge site;
 - e. maintain circulation and drainage patterns in the area of the fill.

Findings

The activity proposed by the applicant will occur during a narrow window of time when the area to be dredging is at lowest water condition and will be limited to the centerline of the canals, an area approximately 6-feet on either side of the centerline. The employment of Best Management Practices in erosion control to keep sediment from escaping into the Kenai River channel, and shaping the canal to eliminate fish entrapment points will satisfy subsections a, d and e. The development of a centerline profile to the satisfaction of permitting agencies and completing the work before fish migration occurs, will satisfy subsections b and c and thus the project may be consistent with Kenai Peninsula Borough Coastal Zone Management policies.

Sincerely,



Gary Williams

Kenai Peninsula Borough

Coastal District Coordinator