



KENAI PENINSULA BOROUGH

Coastal Management Program

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**JOHN J. WILLIAMS
BOROUGH MAYOR**

February 4, 2008

Mr. Tom Atkinson, Project Review Supervisor
State of Alaska Department of Natural Resources
Office of Project Management and Permitting
Alaska Coastal Management Program
550 West 7th Avenue, Suite 705
Anchorage, Alaska 99501

Subject: Stone Step Subdivision Access Roads, AK 0801-01AA

Dear Mr. Atkinson:

The Kenai Peninsula Borough Coastal District has reviewed the subject project and proposes that the project be found consistent with the Statewide Standards of the Alaska Coastal Management Program. The District proposes that an Alternative Measure be attached to the consistency finding.

Project Description

The proposed project consists of improving and extending an existing road into Stone Step Subdivision, installing utilities and constructing 2 shared driveways leading into 13 home lots. To improve the existing road from the Fritz Creek Bridge to the northwest corner of the subdivision site, and to install 8 electrical and 3 phone pedestals, the applicant would discharge existing road material plus approximately 8,525 cubic yards (cy) of imported material (approx. 11,091 cy, total) into 1.32 wetland acres.

The applicant proposes to extend the access road approx. 3,279² (868² through wetlands) by placing approximately 24,101 cy of fill into 0.69 wetland acres. Both the expanded existing road and the new extension would measure approx. 35 feet at base, with a 26-foot-wide crest. You would discharge approx. 206 cy of fill into approx. 0.10 wetland acres to construct the two shared driveways (with a 22-foot base, and 16-foot crest) through 195² of wetlands.

Scope of the Project Review

The proposed project is being reviewed in accordance with the Statewide Standards of the Alaska Coastal Management Program at 11 AAC 12.240, Utility Routes and Facilities, at 11 AAC 112.280, Transportation Routes and Facilities, and provisions in the Standards at 11 AAC 112.900, Sequencing Process to Avoid, Minimize or Mitigate.

Utility and transportation routes, among other criteria, are obliged to avoid, minimize or mitigate alterations in surface and ground water drainage patterns. Activities that cause changes in the discharge of water, particularly those adjacent to coastal bluffs with a history of erosion, must be carried out with care.

Findings

The applicant proposes to avoid and minimize the impact of activities in wet areas by choosing a route that offers access to subdivision lots through uplands to the extent feasible. The applicant will provide silt fencing within clearly defined clearing limits and construct roadways with 2:1 slopes to minimize the area of land coverage. Ditches will be cut to drain to adjacent culverts. Exposed areas adjacent to roadways will be seeded with native materials.

The applicant proposes to require residential sites to be located at least 100-feet from the top of the bluff, ostensibly, as a natural hazard avoidance measure.

Alternative Measure

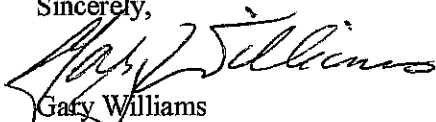
Inasmuch as the project requires cut, fill and drainage in wetlands, to achieve consistency with the requirement in 11 AAC 112.900 (a)(1-2) to avoid and minimize adverse impacts to the extent practicable, the developer should provide a plan that follows Best Management Practices in controlling the amount and velocity of water flow in cut areas to retard sedimentation and erosion. It is recommended that these controls be maintained in place until potential adverse impacts are unlikely due to the growth of native vegetation.

Advisory

Because septic systems add considerable ground water to bluff areas and contribute to solifluction leading to increased erosion and potential threats to life and property, it is advisable to install these systems as far from the bluff as feasible and prudent. It is also prudent to require restrictive covenants that forbid clearing on the bluff side of a building site to protect the integrity of the vegetation system that helps retard erosion.

Thank you for the opportunity to comment on this project.

Sincerely,



Gary Williams
Kenai Peninsula Borough
Coastal District Coordinator