



## **KENAI PENINSULA BOROUGH**

*Coastal Zone Management Program*

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**DAVE CAREY  
BOROUGH MAYOR**

June 22, 2009

Ms. Margie Goatly, Project Review Coordinator  
Alaska Department of Natural Resources  
Division of Coastal and Ocean Management  
550 West 7<sup>th</sup> Avenue, Suite 705  
Anchorage, Alaska 99501

Subject: RFAI: Beluga Slough: Construction of Truck Maintenance Facility and Access Road.  
AK 0905-11AA

Dear Ms. Goatley:

The Kenai Peninsula Coastal District needs additional information in order to be able to adequately review the subject project. We request the applicant to address the following issues:

- 1) 11 AAC 112.280. Transportation Routes and Facilities, requires avoidance, minimization or mitigation of alterations to surface and ground water drainage patterns. The 450' x 20' gravel road and 300' x 500' gravel pad will be constructed in wetlands near a coastline known to be subject to erosion due to changes in the flow of water from the Beluga wetlands complex. The applicant needs to provide analysis that conclusively finds that the project will not cause adverse impacts to coastal land due to changes in current surface and ground water drainage patterns. If alterations to surface and ground water will occur due to the project the applicant must provide a design strategy that will minimize or mitigate the effect of the alteration.
- 2) 11 AAC 112.300. Habitats, requires that projects in wetlands avoid, minimize or mitigate significant adverse impacts to water flow and natural drainage patterns. The project will be constructed in wetlands involving the discharge of 10,320 cubic yards of sand and gravel into 3.79 acres of wetlands. The applicant must provide analysis describing how the project will minimize significant adverse impact to wetlands or, alternatively, mitigation measures.

Sincerely,

Gary Williams  
Kenai Peninsula Borough  
Coastal District Coordinator  
907.714-2216