



**CITY/BOROUGH OF JUNEAU**  
ALASKA'S CAPITAL CITY

February 6, 2003

Mr. Dale Pernula, Director  
Community Development Department  
City and Borough of Juneau

Subject: South Lena Subdivision, SUB2002-00009

Dear Mr. Pernula,

The Wetland Review Board has completed its review of the South Lena Subdivision. Special meetings were held on September 26<sup>th</sup>, 2002, January 27<sup>th</sup>, 2003, and February 3<sup>rd</sup>, 2003. A quorum was present at each meeting. Board review encompassed the following topics:

- 1) Wetland values and functional analysis, to evaluate the impact on wetlands in different areas of the subdivision
- 2) The impact of the wetland footprint on each of the lots
- 3) The drainage plan information, to address concerns about water flow through wetlands and streams
- 4) The conservation designation of the Picnic Creek wetland area
- 5) Sewer information to address intertidal wetland impacts.

The Juneau Wetlands Management Plan defines the Wetland Review Board's advisory role as follows:

*"....The Board also functions as an advisory body to the Planning Commission and the Director of the Community Development Department on other wetlands issues, such as CBJ comments on wetland permits being considered by the Corps for wetlands not covered by the General Permit; the protection of streamside riparian areas, and the conduct of CBJ, State, and Federal projects that affect wetlands and streams."*

Because the Board is concerned about maintaining wetland functions, the integrity of stream drainages, and preventing flooding and erosion of downstream properties, we make the following recommendations concerning the South Lena Subdivision:

- 1) In cooperation with CDD and Engineering staff and the WRB, develop a set of guidelines and Best Management Practices (BMPs) that property owners must utilize

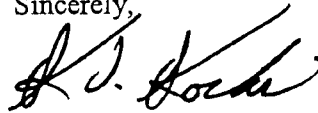
for maintaining the integrity, stability, and flow paths of the permanent and ephemeral streams draining their property. These BMPs will be implemented as a condition of issuing the building permit for each lot. The new road, driveways, buildings, and clearing of vegetation in the subdivision will increase stormwater runoff and cause increased erosion and sedimentation of new and downstream residential properties if adequate preventive measures are not taken and enforced.

- 2) Establish a 25 foot windfirm vegetative buffer between the existing Point Lena road and the lower lots of Unit Three (Blocks A and B) to filter runoff and potential pollutants from these lots, and to prevent erosion and sedimentation along the road drainage ditch. Removal of trees, or limbing and/or topping of trees in the buffer to enhance windfirmness may be allowed as long as the remaining vegetation is left relatively undisturbed. If tree stumps are removed, the remaining hole must be filled and planted with native vegetation. Development of basic services such as access and utilities are permitted within the buffer but must be approved by the CBJ Engineering Department. Since a buffer is not permissible within the DOT right-of-way, the buffer shall begin at the edge of the right-of-way.
- 3) Remove Lots 1-6 from Block D to maintain functions of the muskeg meadow wetland that borders these lots and supplies waterflow to Picnic Creek. Because this wetland is fragile and sensitive to impacts from public use, development of these lots would reduce its function in maintaining flow and water quality in Picnic Creek. If this recommendation cannot be implemented by CBJ, the Board recommends a compromise that reduces the size of lots 1-5, by moving the property lines out of the wetlands; and fully removes lot 6 from consideration, since this lot will be too small to adequately develop without wetland encroachment.
- 4) Establish a maximum building pad size for each lot in Unit Three (Blocks A, B, and C), and prohibit development within the 25 foot rear yard setback. The forested wetlands in Unit Three function to attenuate storm flow and erosion, and extensive clearing of these lots could exacerbate the potential for windthrow and runoff in this Unit. This recommendation will serve to limit the amount of land clearing that can take place within the Unit, which will preserve wetland functions and drainage patterns.
- 5) Support a CBJ maintained and monitored centralized treatment system that uses UV radiation and collects, treats, and disposes of sewage from individual home treatment systems. The Board has concerns that the proposed sewage treatment, including individual home treatment plants, and the outfall location may pollute the nearshore intertidal wetland if there is not continuous monitoring and maintenance. The Board also recommends that this proposed CBJ design be reviewed and approved by consulting engineers and that the system be certified for meeting all state and federal requirements prior to construction.

Lastly, we request that CBJ inform the Board early in the process of all development and land disposal projects, so wetland and habitat issues may be addressed before plans become too far advanced. In particular, we request timely information for the next phase of Lena Subdivision development.

Thank you for your thoughtful consideration of our comments. If you have additional questions, please contact Teri Camery, Wetland Review Board staff liaison, at 586-0755 or [teri\\_camery@ci.juneau.ak.us](mailto:teri_camery@ci.juneau.ak.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Dr. K.V. Koski". The signature is fluid and cursive, with a prominent initial "D" and "K".

Dr. K.V. Koski  
WRB Chairman