



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION  
Office of History & Archaeology

550 West 7<sup>th</sup> Avenue, Suite 1310  
Anchorage, AK 99501-3561  
907-269-8700

<https://dnr.alaska.gov/parks/oha>

May 28, 2025

File No.: 3130-3R KPB / 2025-00547

Jennifer Shields  
Land Management Agent  
Kenai Peninsula Borough  
144 N. Brinkley St.  
Soldotna, AK 99669

SUBJECT: Parcels Proposed for Sale in the Kenai Peninsula Borough 2025 General Land Sale Auction

Dear Ms. Shields,

The Alaska Office of History and Archaeology (OHA) received your correspondence (dated May 15, 2025) concerning the subject project and report on May 23, 2025. We have reviewed the provided documentation for conflicts with cultural resources pursuant to Section 41.35.070 of the Alaska Historic Preservation Act. Following our review, we offer the following comments for your consideration.

A review of the Alaska Heritage Resources Survey (AHRs) database indicates that seven of the thirty proposed parcels fall within one mile or less of known cultural resources (Attached Table): two proposed parcels, 11915007 and 11907106, fall within the boundaries of known archaeological sites or districts.

Parcel 11915007 bisects a known homesteading site (SEW-01198) with multiple built structures. Parcel 11907106 is located wholly within the S qilantnu Archaeological District (SEW-00282), which is eligible for the National Register of Historic Places (NHRP). Our office recommends excluding these parcels from sale or conducting archeological surveys of these parcels to establish whether contributing elements to SEW-01198 or SEW-00282 are present within the proposed parcels. Our office can provide a list of general contractors at your request.

Parcel ID	Area	Cultural Resources Concern
01204014	Nikiski	None
01204017	Nikiski	None
01215004	Nikiski	None
01215005	Nikiski	None
01713003	Salamatof	None
01713063	Salamatof	None
01713064	Salamatof	None
02543309	Moose Point	¼ mi from known cultural resources

02543311	Moose Point	¼ mi from known cultural resources
02544718	Moose Point	1 mi from known cultural resources
02545717	Moose Point	1 mi from known cultural resources
03503070	Hope	300-500 ft from known cultural resources
03503071	Hope	300-500 ft from known cultural resources
05503508	Kalifornsky	None
05503527	Kalifornsky	None
06301166	Sterling	None
06504112	Sterling	None
06519063	Sterling	None
06519070	Sterling	None
06631026	Funny River	None
11907106	Cooper Landing	Within the boundaries of an archaeological district
11911019	Cooper Landing	300-500 ft from known cultural resources
11915007	Cooper Landing	Within boundaries of an archaeological site
13106031	Kalifornsky	None
13106032	Kalifornsky	None
13505224	Caribou Island (Skilak Lake)	None
16905103	Anchor Point	None
17908010	City of Homer	None
17908011	City of Homer	None
19326114	Bear Cove (Kachemak Bay)	None

Thank you for the opportunity to comment. Please contact Molly Herron at [molly.herron@alaska.gov](mailto:molly.herron@alaska.gov) if you need further identification or treatment assistance regarding cultural resources.

Sincerely,



Judith E. Bittner  
State Historic Preservation Officer

JEB:mah



Kachemak Bay Conservation Society  
3734 Ben Walters Ln, Homer, AK 99603  
907 235.8214  
kbayconservation@gmail.com

June 2, 2025

**Re: Sale of Borough Parcels 179-080-10 and 179-080-11**

Dear Members of KPB Lands Committee:

We urge you to **remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10** for the following reasons: (1) The services provided by these high-value wetlands to the public are extremely valuable and should be preserved; (2) the monetary gain to the borough associated with the sale of the lands will almost certainly be offset by the cost to the public of developing them, including costs associated with flood mitigation, road repair, culvert maintenance, the serious health and safety hazards associated with ice on the road, increased risk of septic system failure—the range of issues you are likely familiar with along K-Beach are a good point of comparison; (3) The Kenai Peninsula Borough had an agreement with the City of Homer that the City would purchase these lands from the Borough, but negotiations recently broke down: we urge both the City and Borough to come back to the table and try again—don't throw the baby out with the bathwater: there is too much at stake for the public to let this vital green infrastructure project fall apart.

1)) The City and community of Homer has a vested interest in keeping these high-value wetlands undeveloped, which is why we have secured grant funding for to the purchase of these lands for conservation. And as our current City of Homer Draft Comprehensive Plan points out:

“77 percent of the 551 community survey respondents said that preserving open public spaces within the city from development was important and 34 percent of residents listed sustainable and resilient development as the single most important priority during the Growth Scenarios event... Solutions called out by residents in surveys and meetings include green infrastructure incorporation, open space preservation, and greater attention to development standards for both private development and public infrastructure.”

The wetlands that the borough is proposing to sell, likely for development and commercial activity provide many important and unique functions that are of great value to the people of Homer, it's visitors, and it's businesses, including:

- 2





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Wetlands Complex. Acting as a catchment basin, peatlands in this complex absorb large volumes of water and mitigate the harmful effects of storm surges and thaw events of the drainages that feed into it, protecting Kachemak Drive, as well as the homes and businesses on both sides of the road from large-scale flooding. Think of the peatlands like a reservoir and gravel fill like a roof and ditches like gutters. Filling and developing peatlands of this size is going to increase



peak flow rates — and all associated problems— significantly. This area is already at capacity or just over in terms of fill. We say that because it already has a lot of flooding issues, see eg. The images below. We have also attached additional photos and video related to flooding.



Kachemak Drive is already flooded many times a year, and when the flood turns to ice on the road, as it often does, it creates a really dangerous situation for drivers. These floods and freeze-thaw conditions also create havoc on the road itself, the culverts and ditches along it, causing expensive



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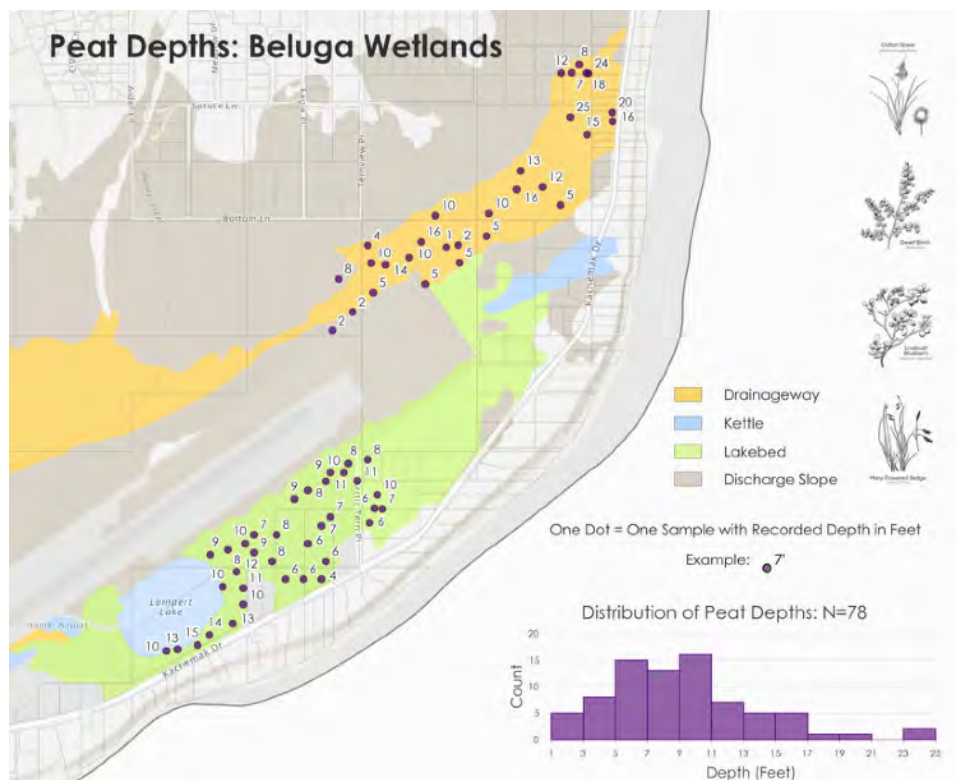
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and frequent maintenance. The increased risk of septic system failures in the area is an important consideration.

You all are likely familiar with the challenge and expense of managing water issues on K-Beach. This is the same kind of thing. Selling these lands for development is going to hurt not help Homer. For example, the City of Homer has analyzed the costs of upsizing culverts to manage increased stormwater runoff associated with increased development and the costs are significant.<sup>3</sup>

As can be seen in the below map generated by Homer Drawdown Peatland Project, while the specific parcels in question were not measured, peat depths in this area range from 7 to 24 ft. This means water depths are 7 to 24 ft. Filling peatlands like this increases the volume of water



The Beluga Wetlands Complex is mitigating this stormwater, and they should be left in place to do their work. Known variously as Green Infrastructure, Nature-Based Engineering, Nature-Based Flood Solutions, the utilization of nature to help manage stormwater is endorsed by

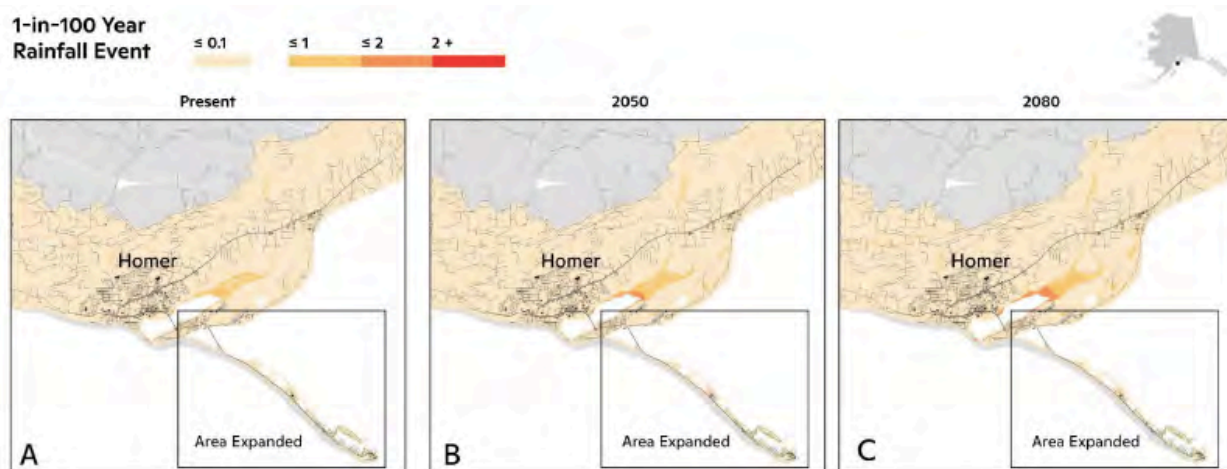
<sup>3</sup> [https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public\\_works/page/49271/low\\_impact\\_development\\_planning\\_study\\_6-30-20\\_final.pdf](https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public_works/page/49271/low_impact_development_planning_study_6-30-20_final.pdf)





FEMA, the US Army Corps of Engineers, and the EPA as the preferred path to effective stormwater management.

It is anticipated that storm surges, along with associated flooding, will only increase moving forward, as the warming climate changes regional precipitation rates.<sup>4 5</sup> A City of Homer climate risk analysis of the area, mapped in the images below, anticipates significant increase of flood risk in to the east of Beluga Lake, with inundations of up to three feet today, and up to six feet by 2050. Ongoing and projected industrial and residential development in the Homer area will contribute to increased flood risk going forward. The value of every bit of the Beluga Wetlands peatlands is tied directly to the changes in flooding risk in the area.



“Homer/Seldovia, AK Climate Risk Analysis” by Woodwell Climate Research Center. Online at: [https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public\\_works/page/76631/homer-seldovia\\_ak\\_climate\\_risk\\_analysis.pdf](https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public_works/page/76631/homer-seldovia_ak_climate_risk_analysis.pdf)

## Erosion Mitigation

The image below shows the long-term trend of significant loss of land along the Homer coastline as a result of coastal erosion.<sup>6</sup> Coastal erosion in the Homer area is largely driven by a high

<sup>4</sup> “Annual precipitation increases of about 15% to 30% are projected for the region by late this century if global emissions continue to increase. All models project increases in all four seasons” (<https://nca2014.globalchange.gov/report/regions/alaska>)

<sup>5</sup> “The amount of inundation from a 1-in-100 year rainfall event in Homer, AK will increase from present day to 2080, particularly east of Beluga Lake due to increased precipitation. Most flooding is limited to near the river banks and on the east side of the lake” ([https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public\\_works/page/76631/homer-seldovia\\_ak\\_climate\\_risk\\_analysis.pdf](https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/public_works/page/76631/homer-seldovia_ak_climate_risk_analysis.pdf))

<sup>6</sup> <https://www.cityofhomer-ak.gov/planning/coastal-erosion>



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incidence of unstable clay soils and flood conditions: high volumes of groundwater and surface water are steadily eroding the coastal the bluff. The image illustrates that peatlands play an important role in mitigating erosion, with erosion rates much reduced around the Beluga Wetlands area in comparison to the Baycrest area. The catchment based holds water during peak flows and significantly reduces the rate of erosion. Filling these wetlands will speed it up.

In recent years, the natural buffer provided by the peatlands has been increasingly compromised through property fill and drainage works on the north side of Kachemak Drive. These developments increase the speed and volume of water flowing through the system during storm surges, driving increased bluff and littoral erosion. As we chip away at the peatlands above Kachemak Drive, hardening surfaces and ditching, we jeopardize the very existence of the high-value properties and road below them.

The stakes here are quite high, and we hope the Borough will work with the City of Homer to protect the peatlands above Kachemak Drive and help preserve the coastline below and direct commercial development to areas zoned for it.

## Stormwater Treatment and Essential Fish Habitat

As can be seen in the above images of drainages from the Homer Boat Yard (left) and drainage from the Beluga Wetlands (right), the peatlands clean water that passes through them. Peatlands are known to remove sediment, fecal coliform, micro-plastics, and hydrocarbons such as engine oil and diesel discharged off of roads, parking lots, boat storage facilities, etc.<sup>7</sup>

The water quality of stormwater runoff in this area is of paramount importance to the Homer community, because it goes directly into Kachemak Bay, which is an Alaska Department of Fish and Game Critical Habitat Area, an International Reserve of the Western Hemisphere shorebird

<sup>7</sup> <https://onlinelibrary.wiley.com/doi/abs/10.1002/clen.202100404>, <https://peatlands.org/assets/uploads/2019/06/Panov-88.pdf>, [https://www.e3s-conferences.org/articles/e3sconf/pdf/2020/08/e3sconf\\_etmc2020\\_07011.pdf](https://www.e3s-conferences.org/articles/e3sconf/pdf/2020/08/e3sconf_etmc2020_07011.pdf)





*Photo 2. Turbid Water about to be discharged into Kachemak Bay as direct runoff from the industrial areas and boatyard, showing visible particulates and flooding of the Kachemak Drive drainage ditch eliminating the small waterfall that is usually here, October 30<sup>th</sup>, 2021*



*Photo 1. Clean Water treated by the Beluga Wetlands showing with visible tannins, littoral erosion and regulated flow during the heavy discharge event on October 30<sup>th</sup>, 2021*

reserve Network and the Kachemak Bay National Estuarine Research Reserve. Kachemak Bay is essential habitat for salmon, shellfish, migratory birds and marine mammals. The value of the ecology and biodiversity of Kachemak Bay cannot be overstated, as Homer's culture is based the health of Kachemak Bay; it is also a significant factor in our property values and propels our tourism industry.

Development of these large borough-owned parcels in the Beluga Wetlands Complex with contribute to reducing the water quality of stormwater runoff into the bay, damaging essential habitat for fishes, waterfowl, and marine mammals. The impact of increased turbidity alone is worth special attention. According to USGS:

“high concentrations of particulate matter affect light penetration and ecological productivity, recreational values, and habitat quality...Particles also provide attachment places for other pollutants, notably metals and bacteria. For this reason, turbidity readings can be used as an indicator of potential pollution in a water body.”<sup>8</sup>

## Migratory Bird and Moose Habitat

<sup>8</sup> <https://www.usgs.gov/special-topics/water-science-school/science/turbidity-and-water>



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Despite the fact that these peatlands are in the middle of town, they support an amazingly rich ecosystem, valued by residents and visitors alike. Increased industrialization of this area represents a diminishment of a rich and valuable local resource that builds up residents' quality of life, the values of our properties, is a basis for substance hunting, and drives tourism. According to the

Alaska Department of Fish and Game:

“More than 100 species of birds visit the vicinity [of Beluga Lake] during spring migration or nest in summer, including shorebirds, waterfowl and songbirds such as golden-crowned and ruby-crowned kinglets. Aleutian terns [classified as vulnerable] sometimes raise young in the Beluga wetlands along Kachemak Drive. Owls, northern harriers and bald eagles take wing over the lake. Chickadees, kinglets and sparrows can be seen in the brush and forest.”<sup>9</sup>

These birds are also a major source of revenue for local people. Every year thousands of people come to Homer for the Kachemak Bay Shorebird Festival, staying in hotels, using water taxis, visiting local restaurants, etc. Birding is a big industry that supports many local businesses and good jobs: a recent study found that the Alaska bird tourism sector generated a total of \$204 million in wages, salary, and benefit. Its contribution to Alaska's GDP as measured through value added, amounted to \$326 million, roughly 1% of Alaska's current-dollar GDP.<sup>10</sup>

In addition to the high-value bird habitat, this area is also important habitat for our iconic Moose population, especially in the winter months. According to the Alaska Department of Fish and Game:

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<sup>9</sup> <https://www.adfg.alaska.gov/index.cfm?adfg=viewinglocations.belugalake>

<sup>10</sup> Schwoerer T, Dawson NG (2022) Small sight—Big might: Economic impact of bird tourism shows opportunities for rural communities and biodiversity conservation. PLoS ONE 17(7): e0268594. <https://doi.org/10.1371/journal.pone.0268594>.



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“from November through April, up to 100 moose can be observed feeding on dwarf willows and other plants growing in the [Critical Habitat] area, or seeking shelter from winds and cold temperatures in the area's spruce forest.”<sup>11</sup>



These moose depend on the wetlands at the proposed site. ADF&G has identified the Beluga Wetland Complex as essential for the survival to the local Homer bench moose herd. It is critical overwintering habitat, valuable in both its food source and its quietude during the stressful late winter months prior to spring “green-up.” If moose habitat is not protected, a “large proportion of the population will die due to malnutrition every winter.”<sup>12</sup> This is especially important because the Homer moose population likely act as a "source" population in providing dispersing individuals to areas of lower moose densities around the lower Kenai Peninsula.<sup>13</sup> Hunters, visitors, and local nature-lovers alike all lose when the moose populations are harmed.

In conclusion, **we urge you to remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.** We ask that you recommend that the City and Borough to come back to the table and try to find a mutually agreeable point-of-sale for the benefit of the public. There is too much at stake to abandon this vital green infrastructure project now.

Sincerely,

Penelope Haas,  
Vice-President, Kachemak Bay Conservation Society

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<sup>11</sup> <http://www.adfg.alaska.gov/index.cfm?adfg=homerairport.species>

<sup>12</sup> Thomas McDonough ADFG Wildlife Biologist, *Homer Wetland Complexes and Management Strategies*.

<sup>13</sup> *Ibid.*



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**Subject:** FW: <EXTERNAL-SENDER>Peatlands

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**From:** Lora Haller <[sparklelake@hotmail.com](mailto:sparklelake@hotmail.com)>

**Sent:** Monday, June 2, 2025 2:22 PM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>Peatlands

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Please help protect the peatlands and not put the following parcels up for sale - 179-080-10 and 179-080-11.

Peatlands need protect to protect other lands from flooding, erosion, and to provide vital habitat for birds and wildlife.

Thank you,  
Lora Haller  
Homer, AK

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**Subject:** FW: <EXTERNAL-SENDER>Please protect our peatlands!

---

**From:** James and Brenda Dolma <[twodolmas@gmail.com](mailto:twodolmas@gmail.com)>

**Sent:** Monday, June 2, 2025 4:01 PM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>Please protect our peatlands!

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**remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.**

P.O. Box 2994  
Homer AK 99603

Kenai Peninsula Borough  
Lands Committee  
Soldotna AK

RE: Sale of Borough Lands Parcel #s 17908010 and 17908011

Dear Borough Lands Committee Members:

I don't support the sale of either of these two properties. Homer residents have been working for years to protect the remaining wetlands in this area for the ecological services these peatlands provide: flood mitigation, erosion control, habitat for in-town moose population and other animals, and carbon sequestration.

In the past other proposals that would have developed high value wetlands in this system, like Parcel # 17909010, did not go forward. Another proposal for a boat storage yard was also turned down because of the significant impacts filling wetlands would have had by reducing or blocking water flow. Conventional wisdom at that time, as well as a requirement of Army Corps, said other locations in dryer areas should be utilized. The Borough should follow suit and remove these parcels from the land sale.

Homer Peatlands has been studying the importance of peatlands and educating the community about the benefits of harnessing the ecological services these wetlands can provide to the Community in filtering run-off, managing flood events, and preventing erosion. The cost of fixing problems that will likely happen when these parcels are developed will far exceed any short-term income the Borough will derive and will most likely be borne by the City of Homer.

Retaining these parcels in their natural state is extremely important because they are part of the other adjacent lands that are undeveloped and form an intact, functioning wetland. Much of the other surrounding rural residential parcels also have substantial portions in a natural or near natural state allowing water to flow naturally through the area. I think the public is beginning to better understand the importance of these wetlands.

The Borough must work closely with the City of Homer to protect these high-value wetlands. If we are to do a good job stewarding and guiding growth in Homer, the Borough and City of Homer need to collaborate in protecting high value wetlands. If these sales go forward, proposed developments requiring considerable fill likely will affect the flow of water, possibly adversely impacting other adjacent properties because of drainage changes. Much better to avoid the problem now and recognize the significant contribution to the community these high-value wetlands provide.

Please work with the City of Homer to help them maintain this important wetland system that residents have been working for years to protect. Let's get these lands into City of Homer ownership instead of selling them off.

Thank you for the opportunity to comment.

Respectfully,

Nina Faust



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**Subject:**

FW: <EXTERNAL-SENDER> Lands Committee re: Ordinance 2025-10

---

**From:** R. A. Foster <[kachemakra@gmail.com](mailto:kachemakra@gmail.com)>**Sent:** Monday, June 2, 2025 9:27 PM**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>**Subject:** <EXTERNAL-SENDER> Lands Committee re: Ordinance 2025-10

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Members of KPB Lands Committee:

**Please remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.**

**These properties' capabilities and suitabilities are for conservation as high value peatlands. Let us keep them working for the City of Homer--mitigating flooding and erosion, providing a nursery and moose habitat, and sequestering carbon.**

**We the people of the Kenai Peninsula Borough should donate these important properties to the people of the City of Homer, for \$1.00.**

**Thank you,  
Rick Foster,  
Homer, AK**

---

**Subject:**

FW: <EXTERNAL-SENDER>Withdraw lots 10 and 11 from the land sale

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**From:** robert vernon <[gogovernon@yahoo.com](mailto:gogovernon@yahoo.com)>

**Sent:** Tuesday, June 3, 2025 5:45 AM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>Withdraw lots 10 and 11 from the land sale

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Ms Turner,

Homer operates on some different thinking, one of which is we don't like fill and concrete.

We like green and figure nature has a balance in cleaning and holding water from flooding and erosion. We request that you **remove Parcels 179-080-10 and 179-080-11 from Ordinance 10.**

**Thank you.**

**come visit sometime,**

**Gordy Vernon**

**Box 3**

**Homer AK 99603**

[Sent from Yahoo Mail for iPhone](#)

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**Subject:**

FW: <EXTERNAL-SENDER>Parcel No 17908010 sale

---

**From:** Therese Lewandowski <[thereselew@gmail.com](mailto:thereselew@gmail.com)>

**Sent:** Tuesday, June 3, 2025 8:51 AM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>Parcel No 17908010 sale

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Hello Borough Lands Committee,

My email box brought an alert about peat land sales along Kachemak Drive on wetlands/marsh.

I don't why the Borough is choosing to put these parcels up for sale, having only just read this but I do urge you to not sell them, to not put them up for sale.

Common knowledge of the lands in this area is that they are moose and bird habitat and provide good water drainage. Now, if developed, the access roads etc will affect these most important things. I don't know why someone would want to live on a muskeg anyway - bug city!

This land is more important as a conservation land. Please leave it that way.

Thank you for your service,  
Therese Lewandowski  
Homer



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**Subject:** FW: <EXTERNAL-SENDER> Removal of Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

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**From:** [marshall@xyz.net](mailto:marshall@xyz.net) <[marshall@xyz.net](mailto:marshall@xyz.net)>

**Sent:** Tuesday, June 3, 2025 9:43 AM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER> Removal of Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

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Dear Ms. Turner,

Please submit my comments to the Borough Lands Committee.

Thank you,  
Karen Murdock

I am requesting that Parcels 1709-080-10 and 179-080-11 be removed from Ordinance 2025-10. These wetlands are important factors in flood and erosion mitigation, stormwater treatment, and bird and moose habitat. These open spaces on Kachemak Drive need to be protected and preserved not sold for potential development.

Undeveloped land in Homer has become a rarity, drastically effecting bird and moose habitat.

For the last decade or more, Kachemak Drive has become a dangerous road to travel. These wetlands help with erosion control and flood mitigation. The road is severely marked with potholes, glare ice in the winter and washouts. Development of those wetlands would exacerbate those conditions.

Please go back to the drawing board with the City of Homer and work to preserve those wetlands.

Sincerely,  
Karen Murdock  
55200 East End Road  
Homer, AK. 99603

---

**Subject:**

FW: <EXTERNAL-SENDER>Ordinance 2025-10

-----Original Message-----

From: Dale Banks <[dale@loopylupine.com](mailto:dale@loopylupine.com)>

Sent: Tuesday, June 3, 2025 9:52 AM

To: Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

Subject: <EXTERNAL-SENDER>Ordinance 2025-10

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To KPB Lands Committee members,

Please remove parcels 17908010 and 17908011 from Ordinance 2025-10.

These two parcels are doing excellent work as high value wetlands.

These particular wetlands function as important flood mitigation, as well as erosion mitigation, and important bird and moose habitat. There is significant peatland depth in the area of these parcels, which contributes high levels of CO2 sequestration.

The second "Whereas" in the ordinance states that these parcels have been reviewed by affected cities (and) Advisory Planning Commissions, however the City of Homer Planning Commission has not reviewed this ordinance or given support to my knowledge. Also, has the City of Homer reviewed this and recommended the sale? I do not think this second "Whereas" is correct.

The third "Whereas" states that the parcels are surplus to KPB needs, however these parcels are demonstrably needed for flood and erosion mitigation as part of the City of Homer's Comprehensive Plan which incorporates Green Infrastructure as stormwater, flood, and erosion mitigation measures. If the parcels are sold for development, they would cease to perform these needed functions.

The fifth "Whereas" attempts to enact an exception to KPB code. The code clearly states: "17.10.090. - Disposition of borough land. Except as otherwise provided by this title no land or interest in land may be sold or leased or otherwise disposed of unless the land has been classified in accordance with the provisions of this chapter." It does not state that an exception can be granted in a "Whereas" line of an ordinance! This appears to be a violation of KPB code.

I encourage you to remove the parcels 17908010 and 17908011 from Ordinance 2025-10, and to review the code requirements for land disposition so that the proper procedures are followed.

Thank you for your consideration,

Dale Banks

5011 Alder Lane

Homer, AK 99603

## **Re: Sale of Borough Parcels 179-080-10 and 179-080-11**

Dear KPB Lands Committee,

### **Please remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10**

It is very disappointing and concerning to learn that the KBP intends to auction off parcels in the wetlands adjacent to the Northern Enterprise boatyard, despite years of negotiations with the City of Homer and the community to maintain these areas as intact habitat and stormwater green infrastructure. Please do not disregard this incredible community effort and the merits that still stand firmly on this issue.

The time and energy that this community has offered to improve things of the public interest is enormous and immeasurable and speaks to the pride in the history and identity of Homer. The **Homer Drawdown: Peatland Project has engaged over 250 volunteers and over a dozen local non-profits**, representing a large portion of the public and organized community that desires increased wetland conservation.

Personal observations in this wetland include high concentrations of moose using the grounds for winter survival, with upwards of 12 moose visible at a time browsing around these lots, great grey owl, sandhill crane, merlin, snipe, eagle, pheasant and songbird nests, owl and pheasant roosting sites, over 22 species of native plants in the immediate area. Critical Wildlife Habitat for moose and other animals is clearly indicated by visible trails covering the wetland area from satellite imagery.



Fig 1: Great Grey Owl hunting in the East Beluga Wetlands



Degradation of community values related to natural beauty and healthy environments is evidenced by nearby development on a residential lot that resulted in severe wetland degradation.



Figure 2: Aerial image of poor development in east Beluga Wetlands and moose trails.

I personally live on Kachemak Drive just below the wetland area in question and experience seasonal flooding that threatens our home. The open ditch and culvert system downstream floods multiple times a year and the severity of flooding is increasing along with the development on East End Road and increased runoff into the wetlands along with an increase in winter rain storms in recent years. With this flooding comes roadway damage which is continuously in a state of degradation and disrepair. The current status of the surrounding state infrastructure and recent residential development is highly dysfunctional and deteriorating the value of the area overall. It is against the best interest of the public to degrade Homer's beautiful natural setting and put existing structures at higher risk of natural disaster damages.



Figure 3: Flooding on Kachemak Drive in late winter of 2025

I would like to request that the Borough strive to achieve these goals when considering parcels for auction:

1. Maintain intact wetland habitat within the city and keep green infrastructure zones contiguous and connected as much as possible to maximize the effectiveness of the habitat for wildlife (especially moose), stormwater management, natural hazard mitigation and water quality standards.
2. Ensure that city and state infrastructure required to support a new development is intact and properly functioning prior to increasing development. Flood risk, road conditions and drainage is already a major problem in this area .
3. Seriously consider the local changing conditions related to natural disasters such as flooding with increased winter rains, erosion, sedimentation and higher volumes of stormwater discharge in punctuated events, as have occurred in recent years.
4. Invest in climate mitigation assets that have global value, such as intact peatlands that store high amounts of carbon, with this wetland area representing the highest value (deepest) peatland within our city limits by this metric. Work to put such assets into conservation status.

Please do not abandon the goal of local green infrastructure and wetland conservation. This decision can never be unmade and the consequences will have great costs.

Sincerely,

Kim McNett  
Homer Drawdown: Peatland Project coordinator





# Kachemak Bay Watershed Council

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The Kachemak Bay Watershed Council facilitates communication, planning, advocacy, and restoration to protect, steward, and revitalize the Kachemak Bay Watershed to ensure the sustainability and integrity of natural and human communities for future generations.

**June 3, 2025**

**Kenai Peninsula Borough  
Lands Committee  
Attn: Clerk  
[micheleturner@kpb.us](mailto:micheleturner@kpb.us)**

**RE: Remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10**

Dear Members of KPB Lands Committee:

Please accept the Kachemak Bay Watershed Council's (KBWC's) comments on the above proposed parcels. KBWC requests that the Borough remove two large Kachemak Drive wetland parcels in an upcoming land-sale. These high value peatlands must be kept in-tact, so that they can continue to provide high-value nature based solutions to the public including providing habitat, mitigating flooding and erosion and sequestering carbon, stormwater treatment, bird and moose habitat.

In addition the monetary gain to the borough associated with the sale of these lands will almost certainly be offset by the cost to the public of developing them, including costs associated with flood mitigation, road repair, culvert maintenance, serious health and safety hazards associated with ice on the road and increased risk of septic system failure.

The Kenai Peninsula Borough (KPB) had an agreement with the City of Homer that the City would purchase these lands from the Borough, but negotiations recently broke down. We urge both the City and Borough to come back to the table and try again. There is too much at stake for the public to let this vital green infrastructure project fall apart.

## **CONCLUSION**

The substantial ecosystem services provided by the Peat Lands are too substantial to give up to short term financial gain. Please advise KPB to re-enter into negotiations with the City to save these important Parcels in question from development.

Please let me know if you have any questions regarding these comments. Thank you.

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**Hal Shepherd, President**  
PO BOX 332 HOMER, AK 99603  
907 – 491-1355

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**Subject:**

FW: <EXTERNAL-SENDER>Per the Lands Committee meeting today - Public comment on Ordinance 2025-10

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**From:** Laurie Daniel <[lauriedanieltnc@hotmail.com](mailto:lauriedanieltnc@hotmail.com)>**Sent:** Tuesday, June 3, 2025 11:30 AM**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>**Subject:** <EXTERNAL-SENDER>Per the Lands Committee meeting today - Public comment on Ordinance 2025-10

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To: Kenai Peninsula Borough Lands Committee  
2025

June 3,

RE: Ordinance 2025-10

I am reaching out to ask that you specifically remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

These parcels have been under an agreement between KPB and the City of Homer that the City would purchase these lands from the Borough. Unfortunately, negotiations have recently stalled. I very strongly urge both the City and Borough to come back to the table and work together on this again. There is far too much at stake for the public to let this effort fall apart.

The services provided by these high-value wetlands are extremely valuable and should be preserved. These services include flood and erosion mitigation, stormwater treatment, carbon sequestration, and providing significant bird and moose habitat.

Including these large Kachemak Drive parcels in an upcoming land-sale is a poor choice. Keeping them ecologically intact and completing the negotiation with the City of Homer, which will wrap them into a vital green infrastructure project, is the wisest use of them and best use for the public interest.

It appears the Borough is looking to dispose of these lots under its Land Affordability Program, designed for residential development through a competitive bid process. These high quality wetlands are not appropriate sites for housing development. A quick assessment of the physical, safety, and environmental risks from developing these lands shows the costs outweigh any financial gain to the Borough. I reference the comments submitted by the Kachemak Bay Conservation Society for detailed illustration of why following through in good faith with the sale agreement between the City of Homer and KPB is in the best interest of all.

Again, I strongly urge you to remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

Thank you,  
Laurie Daniel

[lauriedanieltnc@hotmail.com](mailto:lauriedanieltnc@hotmail.com)



67800 Bluff Road / PO Box 3713  
Homer, AK 99603

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**Subject:**

FW: <EXTERNAL-SENDER>Ordinance 2025-10

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**From:** michael Bavers <[mbavers@yahoo.com](mailto:mbavers@yahoo.com)>

**Sent:** Tuesday, June 3, 2025 11:43 AM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>Ordinance 2025-10

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Please **remove** Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

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**Subject:**

FW: remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

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**From:** Dave Lyon/Louise Seguela <[davelouiseandgalen@gmail.com](mailto:davelouiseandgalen@gmail.com)>

**Sent:** Tuesday, June 3, 2025 12:12 PM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.

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Dear KPB lands committee,

I've lived in Homer for 30yrs, and have watched valuable wetlands and forestlands be developed/destroyed rapidly (especially in the last decade) to the detriment of wildlife, water quality and flow, future carbon storage and protection of diverse peatland habitats, as well as existing infrastructure including roads. As a long term resident who owns property and a business in the borough, and who intends to stay here until I expire, I'm asking that you please remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10. I agree with and appreciate the well thought out comments prepared by the Kachemak Bay Conservation Society on this issue, and include some of them to throw my weight behind protecting these wetlands. Here are the reasons I find compelling:

(1)The services provided by these high-value wetlands to the public are extremely valuable and should be preserved. These services include flood and erosion mitigation, stormwater treatment, bird and moose habitat.

(2) the monetary gain to the borough associated with the sale of the lands will almost certainly be offset by the cost to the public of developing them, including costs associated with flood mitigation, road repair, culvert maintenance, the serious health and safety hazards associated with ice on the road, increased risk of septic system failure—the range of issues you are likely familiar with along K-Beach are a good point of comparison.

(3) The Kenai Peninsula Borough had an agreement with the City of Homer that the City would purchase these lands from the Borough--this arrangement came about because of advocacy from the Homer Drawdown Peatland Project and through a grant secured by KBNERR to purchase the land at assessed value, but negotiations between the City and Borough recently broke down: we urge both the City and Borough to come back to the table and try again—don't throw the baby out with the bathwater: there is too much at stake for the public to let this vital green infrastructure project fall apart.

Thank you for your consideration and hard work on creating a better future for all residents

of the borough by proceeding cautiously when selling or leasing borough land for development.

Sincerely,  
Louise Seguela  
38794 Truman St  
Homer AK  
907 299 6840



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**Subject:** FW: <EXTERNAL-SENDER>remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10

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**From:** Daniel Perry <[perrydaniel@icloud.com](mailto:perrydaniel@icloud.com)>

**Sent:** Tuesday, June 3, 2025 12:20 PM

**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>

**Subject:** <EXTERNAL-SENDER>remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10

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**To Whom it may concern:**

**Please remove Parcels 179-080-10 and 179-080-11 from Ordinance 2025-10.**

The value of the peatland is best realized in its current state as erosion mitigation, stormwater treatment, and bird and moose habitat.

I urge the Kenai Peninsula Borough and the City of Homer to reenter negotiations for Homer to purchase these lands from the borough to keep in a non-developed state for the benefit of the community.

Thank you for your consideration.

Daniel Perry  
555 Waddell St.  
Homer, AK 99603

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**Subject:**

FW: <EXTERNAL-SENDER>Proposed sale of of KPB parcels 17908010 and 17908011 in Homer

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**From:** Ed Berg <[edwardberg100@gmail.com](mailto:edwardberg100@gmail.com)>**Sent:** Tuesday, June 3, 2025 12:23 PM**To:** Turner, Michele <[MicheleTurner@kpb.us](mailto:MicheleTurner@kpb.us)>**Subject:** <EXTERNAL-SENDER>Proposed sale of of KPB parcels 17908010 and 17908011 in Homer

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Hello KPB Lands Committee,

The two KPB parcels proposed for sale (17908010 and \_\_\_11) are part of a trio of parcels (including \_\_\_12) at the top of the Beluga peatlands. Presumably #12 will be offered for sale in the future, especially if #10 and #11 are commercially developed, as expected. The sale of these properties would chop off the northern 330 feet of these peatlands (an area of 7.5 acres). The peatlands are valuable habitats for moose and other wildlife, as well as providing water filtration and storage, and sequestering carbon in the peat.

Conservation buyers and the COH have been slowly acquiring parcels in these peatlands with the goal of setting them aside as a permanent conservation area for wildlife and recreation. I would hope that the KPB will support this ongoing effort by not selling the proposed parcels and putting all of the KPB parcels in this peatland into a conservation status.

Best regards,

Ed Berg PhD

Ecologist (Ret'd)

US Fish & Wildlife Service

Instructor in Geology

Kenai Peninsula College

4492 Towne Heights Lane

Homer AK 99603

608-628-2088

---

**Subject:**

FW: <EXTERNAL-SENDER>Update from KBNERR and City of Homer on Kachemak  
Sponge / Kachemak Peatlands Project

**From:** Katherine Schake <[kschake@alaska.edu](mailto:kschake@alaska.edu)>

**Date:** June 3, 2025 at 3:51:49 PM AKDT

**To:** Francie Roberts <[francieroberts@gmail.com](mailto:francieroberts@gmail.com)>, Madeline Lee <[madeline@crrcalaska.org](mailto:madeline@crrcalaska.org)>, Dana Brown - NOAA Federal <[dana.brown@noaa.gov](mailto:dana.brown@noaa.gov)>, Bretwood Higman <[hig314@gmail.com](mailto:hig314@gmail.com)>, Janette Keiser <[jan@keisergroup.com](mailto:jan@keisergroup.com)>, Donna Aderhold <[donnagrace99@gmail.com](mailto:donnagrace99@gmail.com)>, "Dunne, William" <[wdunne@kpb.us](mailto:wdunne@kpb.us)>, Jessica Shepherd <[shepherdinthegarden@icloud.com](mailto:shepherdinthegarden@icloud.com)>, Michael V Opheim <[michael@crrcalaska.org](mailto:michael@crrcalaska.org)>, "Carol G. Harding" <[carolgharding1@gmail.com](mailto:carolgharding1@gmail.com)>, Laurie Daniel <[alaska.bioworks@gmail.com](mailto:alaska.bioworks@gmail.com)>

**Cc:** Kachemak Bay Conservation Society <[kbayconservation@gmail.com](mailto:kbayconservation@gmail.com)>, Loren Barrett <[loren@inletkeeper.org](mailto:loren@inletkeeper.org)>, Melissa Jacobsen <[MJacobsen@ci.homer.ak.us](mailto:MJacobsen@ci.homer.ak.us)>, Julie Engebretsen <[JEngebretsen@ci.homer.ak.us](mailto:JEngebretsen@ci.homer.ak.us)>, Marie McCarty <[Marie@kachemaklandtrust.org](mailto:Marie@kachemaklandtrust.org)>, Carson Chambers <[carson@kachemaklandtrust.org](mailto:carson@kachemaklandtrust.org)>, Erin Larson <[el Larson15@alaska.edu](mailto:el Larson15@alaska.edu)>, Matthew Carlson <[m Carlson@alaska.edu](mailto:m Carlson@alaska.edu)>, Syverine Bentz <[syverine@alaska.edu](mailto:syverine@alaska.edu)>, Rose Masui <[rm Masui@alaska.edu](mailto:rm Masui@alaska.edu)>, Ingrid Harrauld <[ieharrauld@alaska.edu](mailto:ieharrauld@alaska.edu)>, Nannette Pierson <[nnpierson@alaska.edu](mailto:nnpierson@alaska.edu)>, Spencer Johnson <[sjohnson49@alaska.edu](mailto:sjohnson49@alaska.edu)>, Kim Schuster <[kkschuster@alaska.edu](mailto:kkschuster@alaska.edu)>, Jasmine Maurer <[jmaurer@alaska.edu](mailto:jmaurer@alaska.edu)>, Lauren Sutton <[lsutton7@alaska.edu](mailto:lsutton7@alaska.edu)>, Lindsey Flagstad <[laflagstad@alaska.edu](mailto:laflagstad@alaska.edu)>, Kyra Wagner <[kyra@homerswcd.org](mailto:kyra@homerswcd.org)>, Satchel Pondolfino <[satchel@inletkeeper.org](mailto:satchel@inletkeeper.org)>

**Subject:** <EXTERNAL-SENDER>Update from KBNERR and City of Homer on Kachemak Sponge /  
Kachemak Peatlands Project

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Dear KBNERR Community Council, Partners and Staff,

Please see below the update from the City of Homer regarding the current status of the Kachemak Sponge Peatlands Acquisition project. This update is from City Manager, Melissa Jacobsen, and will be included in the upcoming Manager's report to Homer City Council. There has been recent, open conversation between the City, the KP Borough and KBNERR regarding the sale of KPB parcels to the City for conservation of Kachemak Drive Peatlands/ Wetlands. We consider partial purchase of the KPB parcels for conservation a huge success of this NOAA-funded project, and that is what we are pursuing at this time.

Please keep this in mind if you plan to testify at the KPB Hearing tonight.

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Kachemak Peatlands Project Parcels (From Homer City Manager)

The Kenai Peninsula Borough (KPB) has released their vacant land parcels for disposal as part of the KPB 2025 General Land Sale process. In their list of properties they have included two of the eight properties that were being considered for the Kachemak Peatlands project. This has

created some stir in the community, particularly with folks involved with the Homer Drawdown group who have distributed a Call to Action. One point they've raised is that the City and KPB need to come back to the table and try again. I want to take this opportunity to emphasize that this is an important project to the City of Homer and the City, KPB, and our partners at KBNERR and KHLT are continuing to communicate regarding the significance of these properties to the City for erosion mitigation, storm water treatment, and bird and moose habitat. The KPB did take the 8 properties in the peatlands proposal off their land disposal list in 2021 while we navigated the NOAA grant with the University of Anchorage, but no formal agreement to transfer properties was put into place. Property appraisals were done on the KPB parcels as part of the grant requirements and the appraisals came in well below the KPB assessed value. In addition, the City Council acknowledged with 24-124(S) and accompanying memorandums that the cost to install the infrastructure, as proposed in the plan, is cost prohibitive for the City. Council expressed support for continued land acquisition through the grant to conserve the Kachemak Peatlands and recognize there are likely more affordable opportunities for installing future infrastructure. The KPB recognizes the value of their properties and with the low appraisal value each of the eight properties received, have reconsidered two that have value for resale, and are still considering the remaining six for inclusion in the Kachemak Peatlands. Also, two additional privately owned properties are being appraised for potential inclusion in the project. We at the City look forward to continued partnership with the KPB, KBNERR, and KHLT on acquiring properties in the Kachemak Peatlands.

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Thanks,  
Katherine

--

Katherine Schake  
Reserve Manager  
Kachemak Bay National Estuarine Research Reserve  
Alaska Center for Conservation Science, University of Alaska Anchorage  
Direct line: 907-235-1593  
Office: 907-235-4799  
<https://accs.uaa.alaska.edu/kbnerr/>  
[kachemakbayreserve.org](https://kachemakbayreserve.org)