

INFORMATION ON ASSEMBLY-APPROVED MUNICIPAL LAND USE/PLANNING DOCUMENTS RE: STRAWBERRY BOG WETLANDS

Compiled by Turnagain Community Council President Cathy Gleason (2020) — (updated 2021)

Below are Assembly-adopted planning document references regarding **Strawberry Bog**, the natural open space/wetland complex being proposed for development of a solar farm. These important Municipal plans clearly and consistently identify Strawberry Bog as a high value, natural open space that provides important values and functions for the West area of our community — and the public expectation, intent and the directive of these documents is for these Class A wetlands to be preserved in their current, undeveloped state.

- **2020 Anchorage Bowl Comprehensive Plan** (Assembly adopted 2001)
 - Conceptual Natural Open Space Map (page 63) identifies area of **Strawberry Bog** as “**Community Preference for Natural Open Space,**” (*identified by the public*) and “**Important Wildlife Habitat**” (*identified by local wildlife experts and scientific reports*)
 - This section of the **Anchorage 2020** document states (page 62), “**Anchorage 2020** proposes that new open space standards, management plans and methods, and priorities for open space protection be developed through continuing planning efforts, particularly by revision of the *1985 Anchorage Park, Greenbelt and Recreation Facility Plan* and selective amendments to the Anchorage Municipal Code.” This is relevant to the bullet item below:
- **Anchorage Park, Natural Resource & Recreation Facility Plan** (Assembly adopted 2006)
 - Map 6: Natural Resource Use Areas designates area of **Strawberry Bog area** as “**Preservation Areas, Other MOA Land**”
 - The Map 6 Legend includes the following language:
 - “Natural Resource Preservation Land: Those areas that perform important environmental functions and have high ecological values. This includes...Class A and B wetlands...determined to have unique or threatened habitat values.”
 - Appendix B (pages 10-11) includes the following language:
 - **Class A wetlands** are included in the category of “**Natural Resource Preservation Land,**” and are defined as “Those areas that perform important environmental functions and have high ecological values” and “...should be permanently dedicated as **NR Preservation Lands that can only be altered by a 60 percent vote of the community.**” (my emphasis)

- ***West Anchorage District Plan (WADP)*** (Assembly adopted 2012)
 - 2.5 Park, Recreation, and Open Space section (page 47) states, “The Southwest Parks District...has a large concentration of **Natural Resource Use areas (areas designated for preservation rather than public use).**” (my emphasis)
 - Exhibit 2-14: Wetlands Classifications and Coastal Zone Boundary map (page 52) designates **Strawberry Bog wetlands area as "Class A (High Value)"** (my emphasis)
 - Exhibit 4-1b: Sand Lake Land Use Detail (page 75) designates **Strawberry Bog area as "Parks and Natural Resource."** (my emphasis)
 - Parks Objective #4 - **Manage, protect and enhance municipal parks, greenbelts and natural open space areas (including riparian and wildlife corridors) that support fish and wildlife habitats and wetland functions (page 75):** This section states, “The WADP recommends that **high-value wetland parcels to be retained or acquired for permanent protection.** Wetlands owned by the Municipality [which includes **Strawberry Bog**], **should be preserved with a conservation easement or transferred to an appropriate public agency for long-term preservation and management.**” (my emphasis)
- ***Anchorage Wetlands Management Plan*** (Assembly adopted 2014)
 - Figure 4: Wetlands Designations/Anchorage Bowl – Southwest (page 117) designates **Site #34B: Strawberry Bog area Class “A” Wetlands.**
 - Table 4.1 Anchorage Bowl Wetland Designations, Enforceable and Administrative Policies, and Management Strategies (page 54) states as an ***Enforceable Policy for Site #34 CONNOR’S-STRAWBERRY BOG: “Municipal lands within Connor’s-Strawberry bog SHALL be managed for open space, wildlife habitat, and wetland functions.”*** (my emphasis). It also scores this wetland high in Hydrology (114); Habitat (138); Species (98); Social Function (80), and describes the area as “Significant waterbird migratory and nesting habitat complex.”
- ***2040 Anchorage Land Use Plan*** (Assembly adopted 2017)
 - Anchorage 2040 Land Use Plan Map identifies **Strawberry Bog as “Park or Natural Area.”**
 - Goal 8 Open Space and Greenways section (page 24) states, "Anchorage offers the kind of places that are gone from most other cities. **Open spaces...are valuable assets** of this community. Anchorage recognizes that natural areas are a **vital infrastructure** that sustains neighborhoods and centers experiencing infill and development." (my emphasis)
 - The Plan (page 24) states, "The *Anchorage 2020 Conceptual Natural Open Space Map*, updated as the Natural Assets Map (Map CI-7), Appendix A, informs strategic **decisions about preservation priorities** and new additions to this green infrastructure." (my emphasis)

o Open Spaces/Park or Natural Area section of Plan states "This Plan preserves and retains open space in two designations. The first, "Park or Natural Area," depicts **existing and planned municipal open spaces.**" (page 50) And, "The Park or Natural Area designation provides for active and passive outdoor recreation needs, **conservation of natural areas** and greenbelts and trail connections." (page 51) (my emphasis)

- **Anchorage 2040 Land Use Plan Gallery Community Natural Assets** identifies **Strawberry Bog area as part of a "Natural Asset Hub"** (one of 6 Hubs within the Anchorage Bowl), **"Class A Wetlands,"** and an **"Open Space and Important Habitat Intersect"** (MOA website)

- **Municipality of Anchorage Heritage Land Bank 2021 Annual Work Program & 2022-2026 Five-Year Management Plan** (Assembly adopted 2021)

o Land Management Objectives, fifth bullet (page 7): "...promote orderly development **consistent with the goals of the Comprehensive Plan and the Anchorage Wetlands [Management] Plan...**" (my emphasis)

o Appendix B, Heritage Land Bank Policies, IV. HLB Land Disposals: (page 2) This section states: "The HLB periodically makes determinations regarding disposal of land or interests in land, consistent with the Municipal Charter, Municipal Code, the HLB Annual Work Program and Five-Year Management Plan, and HLB Policies. **All land disposals must also be consistent with the Comprehensive Plan and implementing measures** as well as long-term municipal and community development needs." (my emphasis)

Energy produced from the proposed solar farm will be used by Chugach Electric Association, which is not a municipal utility. There are other opportunities for solar energy generation in the Anchorage Bowl, including solar panels on south-facing sides and roofs of residential and commercial buildings — or on privately-owned land.

o Appendix B, Heritage Land Bank Policies, IV. HLB Land Disposals, Leases: (page 3) This section states: "Per AMC 25.40.025F, leases are awarded by open competition bid process based upon one of three forms of compensation: (a) for at least appraised fair market rental rates as determined by a certified real estate appraiser; or (b) a percentage of gross receipts; or (c) a user fee."

Please note that this proposed lease of HLB land to Renewable IPP, a private, for-profit company, is at less than fair market value.

The above-referenced section of HLB Policies (page 3) states, "HLB may also lease non-competitively to a **non-profit agency for less than the appraised fair market value...**" As stated above, Renewable IPP, LLC is a for-profit entity and should not receive a lease at less than the appraised fair market value.

At the November 12, 2020, HLB Advisory Commission meeting, I don't recall HLB staff stating that an appraisal had been conducted on HLB Parcel 5-002A, Strawberry Bog, where a solar

farm is proposed — that would be information important to provide to the public. If an appraisal has not been conducted, it should have been *before* this proposal went before the HLB Advisory Commission on November 12, 2020, for consideration.

Impacts associated with this proposed solar farm development would include extensive fencing around 65 acres of Municipally-owned natural open space (which would restrict virtually all non-bird wildlife use — as well as neighborhood recreational use — of this high-value habitat as well as compromise migratory bird nesting habitat), and alter the hydrology of wetland functions (through installation of the fencing, pilings for 24,000 solar panels, a 1.4-mile trail around the perimeter of the development, transformer pads, any access roads into the facility — and possible vegetated aesthetic berm buffer? (Not clear if a berm is proposed). Any noise generation from this facility is also something that needs to be accessed, to identify any potential impacts to wildlife, recreational users of remaining accessible natural open space areas, and nearby residents.

Based on this level of activity and development — and based on the above Assembly-adopted plans, which Turnagain Community Council actively participated in the development of, and commented on — our council voted to oppose the Chugach Solar Farm facility at the Strawberry Bog location at our December 5, 2020, meeting. Due to a procedural issue brought to the Board's attention after the meeting, the TCC Board voted at our December 30, 2020, meeting to reaffirm this vote. No one objected to the Board's action at our January 7, 2021, general membership meeting.

If the Assembly approves this high value West Anchorage community asset for a less-than-fair-market-value lease of Municipally-owned land to a private, for-profit company — *which would not conform with any of the above Municipal planning documents* — it would set a very disconcerting precedent for disposal of future Municipally-owned land as well as taint credibility that other planning document goals, objectives, policies and/or mandates will be appropriately followed.

Please don't hesitate to contact me to discuss this further, if you have any questions, or if any of the above references is in error. We will all benefit from being fully informed with accurate information on this long-term lease proposal of an important, high-value community asset in West Anchorage.

Sincerely,

Cathy (Gleason)
Turnagain Community Council Acting President
248-0442