MEA
MATANUSKA ELECTRIC ASSOCIATION

April 3, 2013

Tina Crawford
City Planner
City of Wasilla Planning Office
290 East Herning Avenue
Wasilla, AK 99654-7091

Subject: Waiver of Site Plan Request
MEA Land Use Permit Application

Dear Ms. Crawford:

As a result of the recent summary rejection of the permit application, initially on the basis that the corridor plan was not the right size, despite numerous iterations of that same plan of various sizes and colors previously transmitted to your office electronically and by hard copy, Matanuska Electric Association, Inc. (MEA) once again is formally requesting Waiver of the Site Plan requirement as specified in Wasilla Municipal Code Section 16.08.015 D.2. That waiver requires a recommendation from you as the City Planner and the Public Works Director to accompany the MEA permit applications to the Planning and Zoning Commission. Pursuant to Wasilla City Code Section 16.08.015 D.2. the commission may waive the requirement for a site plan "after considering the recommendations of the public works director and city planner." Our reasons for the request are set forth below:

1. Granting a waiver to the site plan requirement for a longitudinal public service right of way is sound public land use policy.

   Just as the City of Wasilla provides public roads, water and sewer services, MEA as a public service provider is supplying a necessary service to the public that is vital to the public safety, health and economic well-being of the City of Wasilla, the surrounding areas, and is consistent with the City's Comprehensive Plan. Provisions in the code for site plans were written contemplating the development of a single parcel of property. Most of the provisions are inapplicable to development of long longitudinal public rights of way, especially in the preliminary routing process needed to identify corridors for high volume transmission facilities, such as electric and gas transmission lines and sewer and water trunk lines. Requiring utilities to proceed to a design level analysis for one or more alternatives prior to identification of an approved route leads to significant waste of public taxpayer and consumer dollars, especially if the corridor analysis is not approved, and the same process is required multiple times before the initiation of a final design.

   Consistent with public policy for corridor routing approvals, for a permit application that does not require elevation, the planning director's routing approval would accompany the request for the waiver of the site plan requirement by the Planning and Zoning Commission. A condition of planning director's routing approval would be final design plan approval by the Public Works Director or the director's designee. If elevation of a permit application is necessary as specified by code, the waiver application could accompany the corridor

approval application. Commission approvals would also be subject to final design approval by the Public Works Director or the director's designee.

2. Technical standards for preparation of a site plan are impracticable for corridor selection for long right of way projects.

   Literal compliance with this ordinance would require the following: identification of more than 85 individual lots which establish one boundary of the public rights of way whether or not easements are required from the adjacent properties; finding and/or resetting all property corners; computing all found lot dimensions; identification of all easements, particularly those that would be identified by a title report; the location of all existing and proposed utility facilities, on-site water and wastewater facilities and fuel facilities; location of lakes, streams and potential wetlands with 75 feet of any proposed structure; identification of all setbacks; location of all existing and proposed permanent structures; the location of existing parking spaces, trash facilities, snow storage and lighting; identification of pedestrian and vehicular access, roadways, driving aisles, sidewalks, trails, paths, curbs and gutters, catch basins and culverts and drainage patterns; and identifying the locations and dimensions of each landscaped area with a showing of the type and quantity of landscaping along with the native vegetation retained or removed.

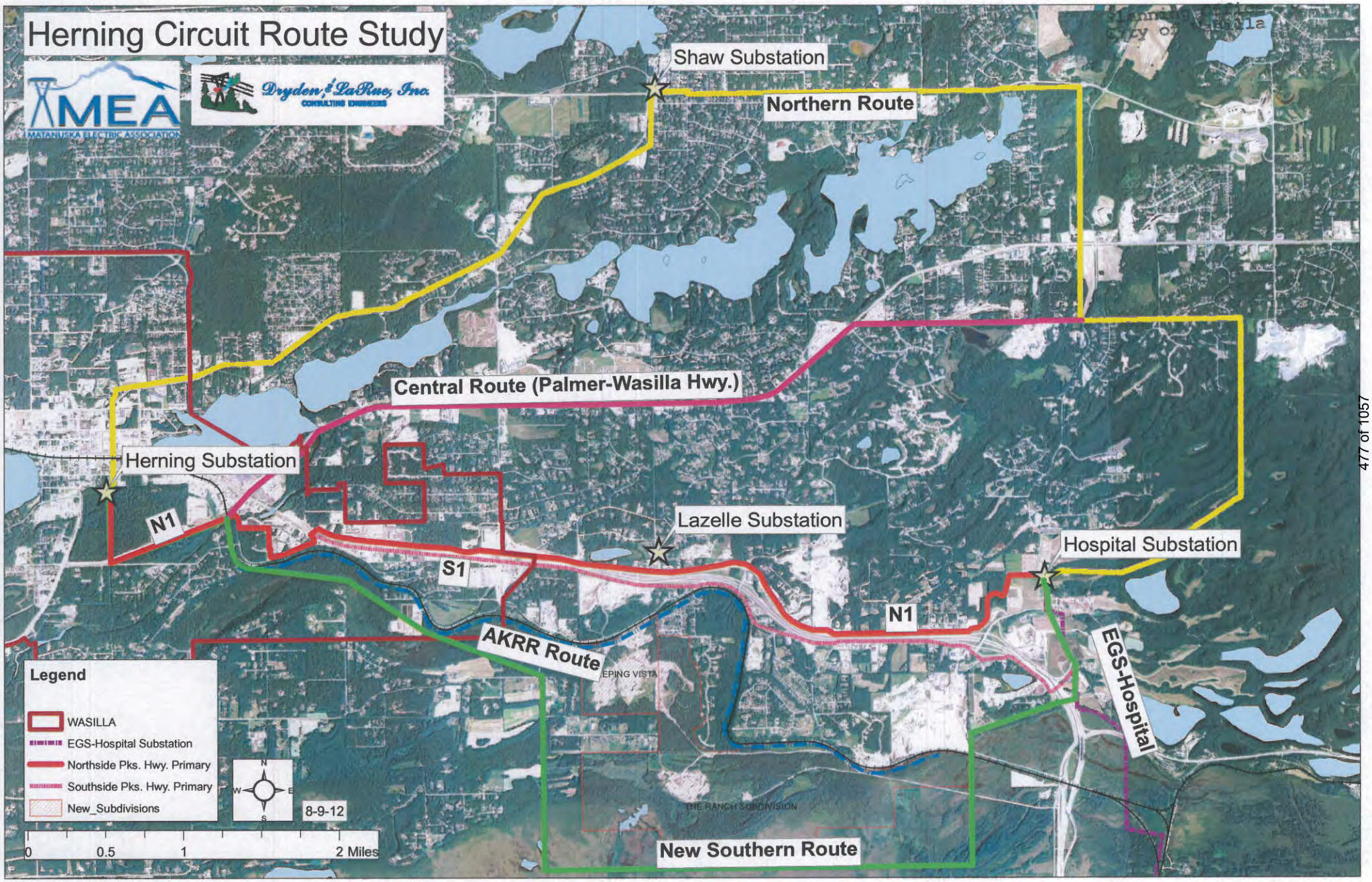
   In this case the standards call for submittal of the site plan on 8½" by 11" or 8½" by 14" sheets at a scale of 1" = 50'. The portion of the project within the City of Wasilla is nearly 17,700 feet long which would require a minimum of 30 legal size sheets.

MEA has legal, regulatory, contractual and policy obligations to provide its customers with reliable, safe and affordable power and it takes that responsibility seriously. Alternatively MEA recognizes the need for meaningful information to inform the public and review in the decision making process. To that end we have provided preliminary mapping using borough data, both aerial photo and by borough parcel mapping. Our corridor plan map shows the alignment and the anticipated areas required from adjacent properties. This mapping was prepared from ortho-photography flown in May of 2012.

We ask that you consider the attached corridor plan and recommend waiver of the site plan to the Planning and Zoning Commission.

Sincerely,
Matanuska Electric Association, Inc.

Gary Kuhn, P.E.
Director of Engineering
Matanuska Electric Association, Inc.
(907) 761-9281



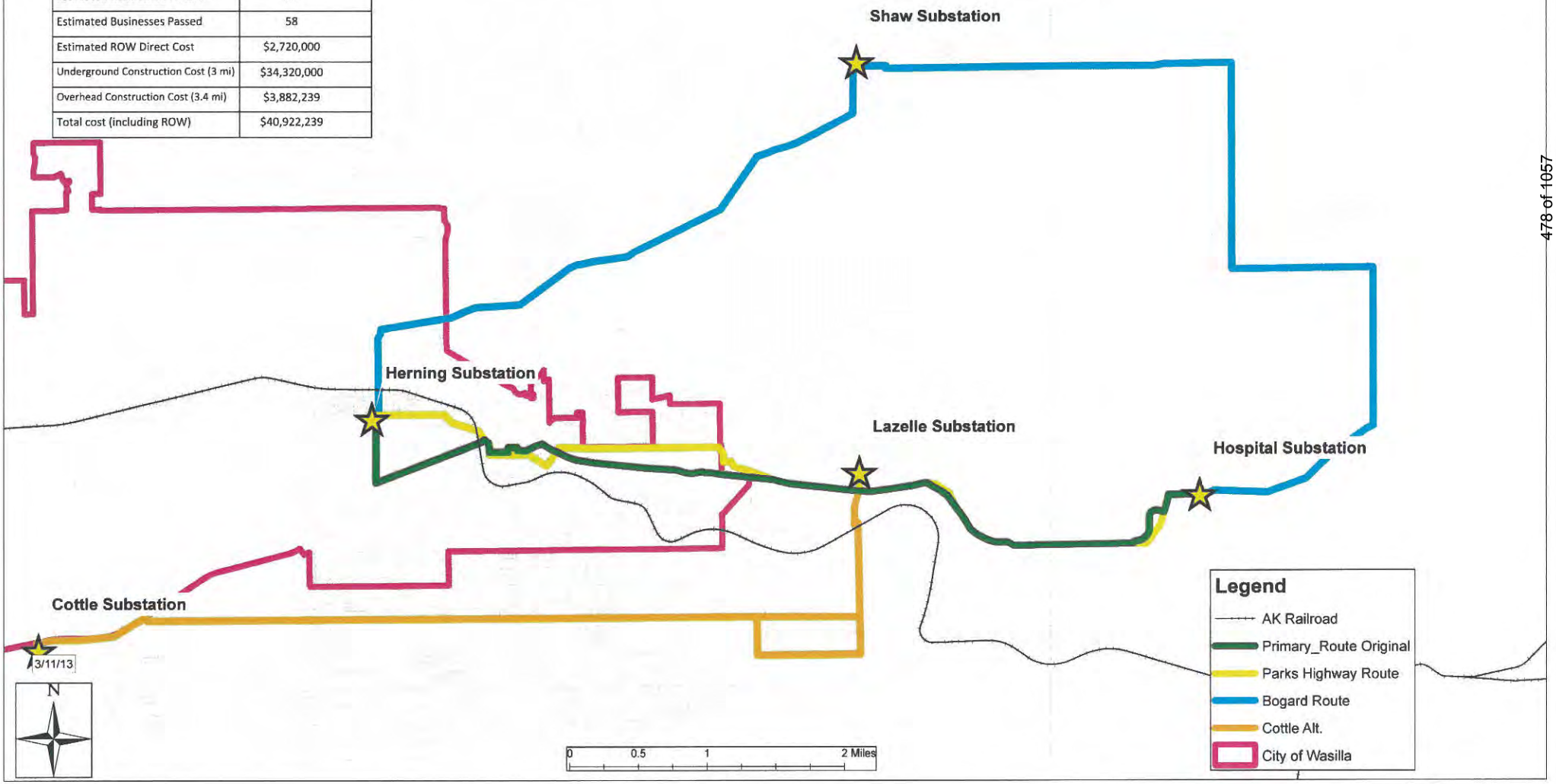
Original Parks Highway Route	
Project Length	6.4
Estimated Number of Parcels	49
Estimated Residences Passed	24
Estimated Businesses Passed	58
ROW Direct Cost	$2,720,000
Construction Dollars	$7,030,000
Order of Magnitude Costs	$9,750,000

Parks Highway Back Lot	
Project Length	6.7
Estimated Number of Parcels	62
Estimated Residences Passed	29
Estimated Businesses Passed	72
ROW Direct Cost	$5,900,000
Construction Dollars	$7,500,000
Order of Magnitude Costs	$13,400,000

BOGARD ROAD ALTERNATIVE	
Project Length	12.7
Estimated Number of Parcels	150
Estimated Residences Passed	46
Estimated Businesses Passed	43
ROW Direct Cost	$1,190,000
Construction Dollars	$12,505,000
Demolition Costs	$1,270,000
Order of Magnitude Costs	$14,965,000

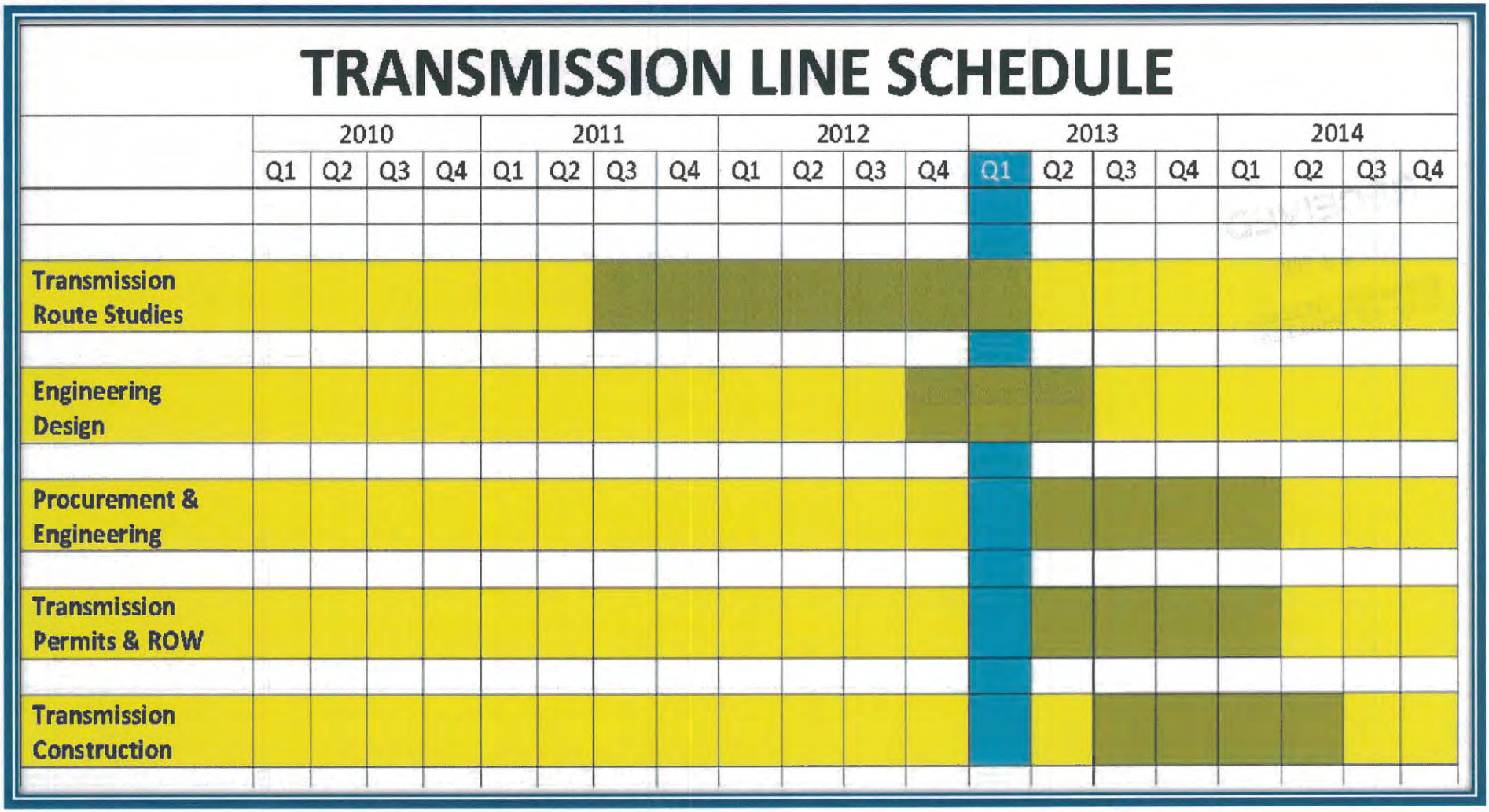
Cottle/Fairview Loop Route	
Project Length	12.1
Estimated Number of Parcels	58
Estimated Residences Passed	65
Estimated Businesses Passed	32
ROW Direct Cost	$2,050,000
Construction Dollars	$11,875,000
Order of Magnitude Costs	$13,925,000

Original Parks Highway Route (Underground)	
Project Length	6.4
Estimated Number of Parcels	49
Estimated Residences Passed	24
Estimated Businesses Passed	58
Estimated ROW Direct Cost	$2,720,000
Underground Construction Cost (3 mi)	$34,320,000
Overhead Construction Cost (3.4 mi)	$3,882,239
Total cost (including ROW)	$40,922,239



HOSPITAL SUBSTATION TO HERNING OR COTTLE SUBSTATION

TRANSMISSION LINE SCHEDULE



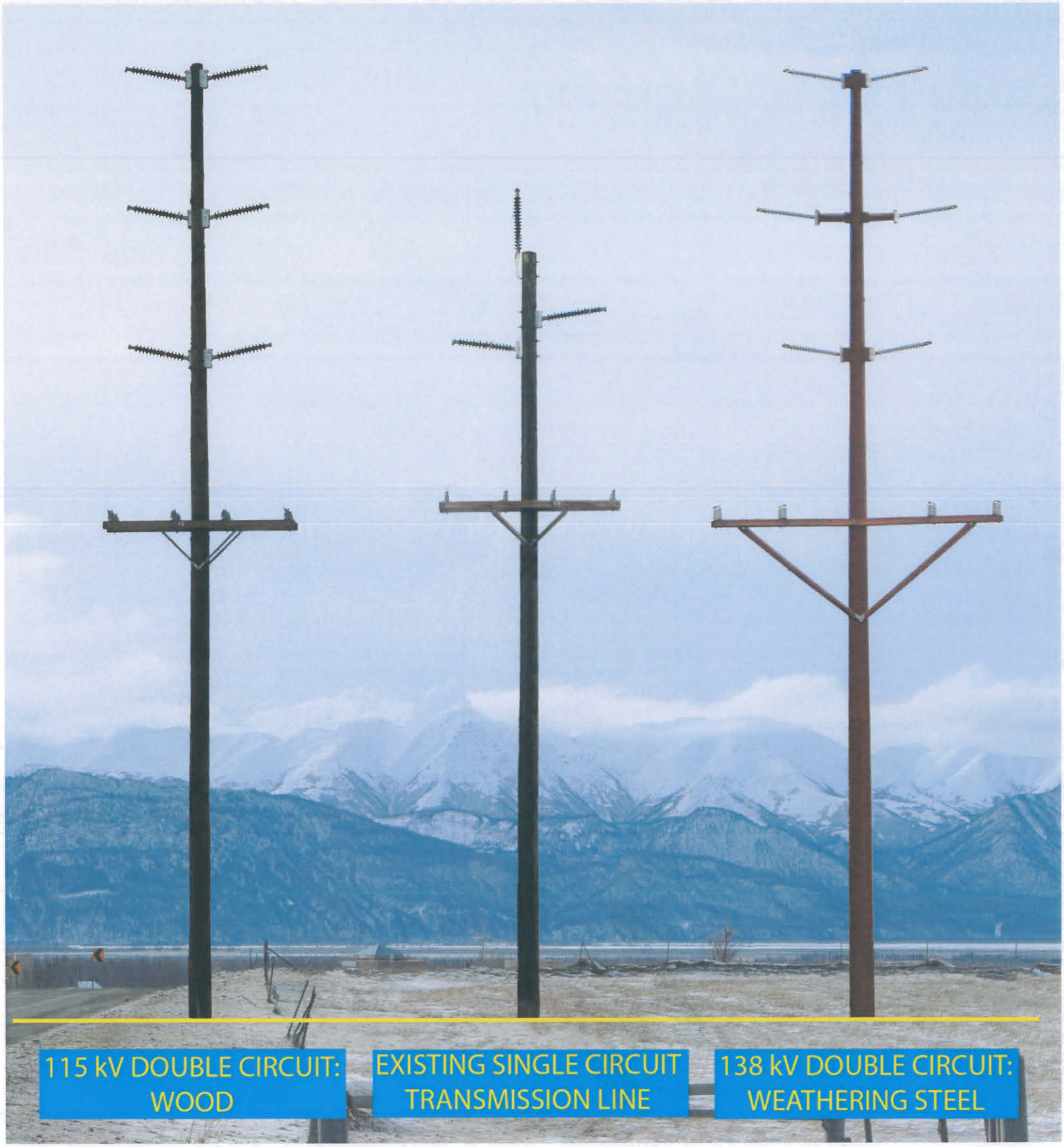
MEA

HOSPITAL SUBSTATION TO HERNING OR COTTLE SUBSTATION

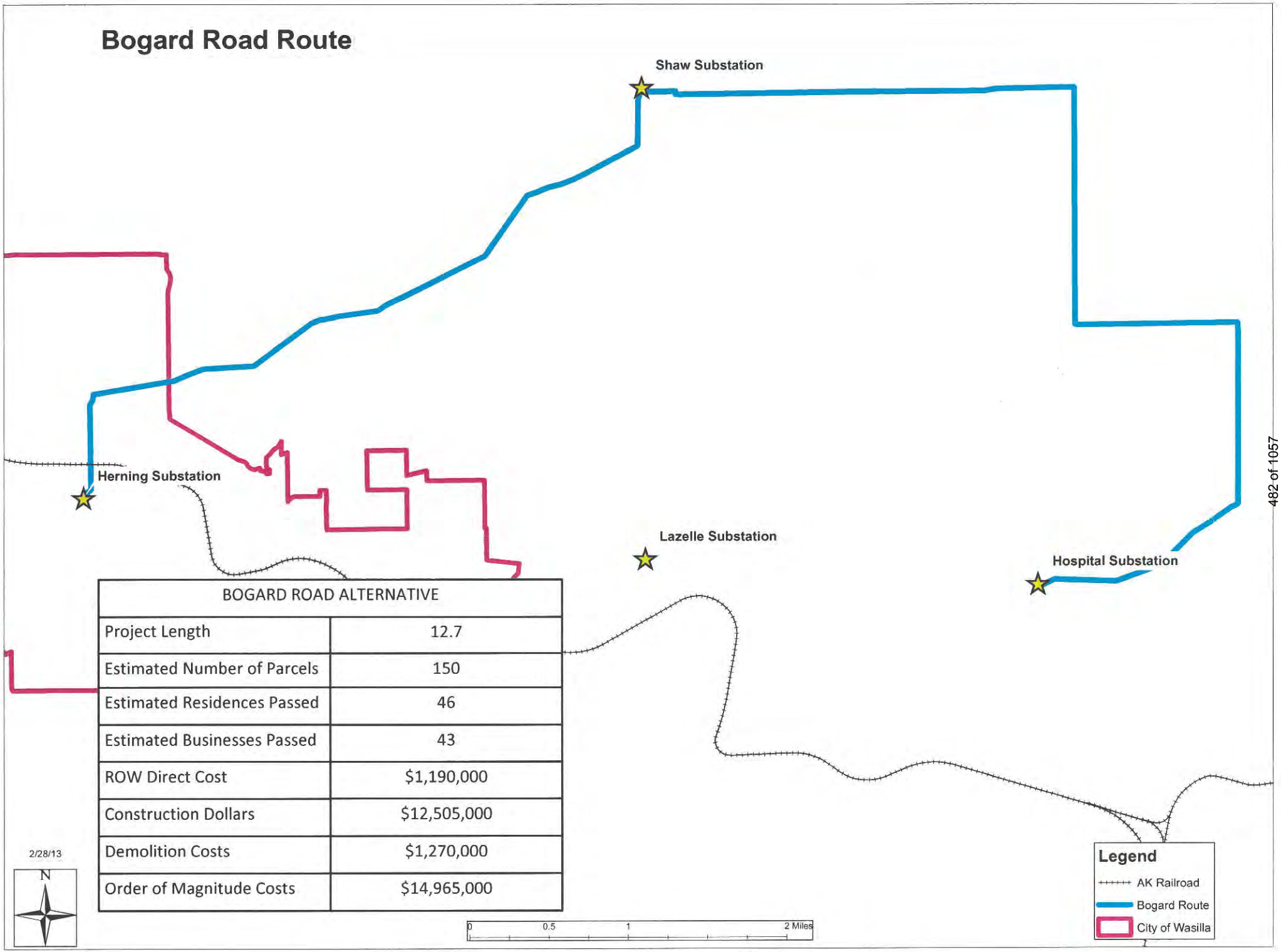
The Need For a Transmission Line From Hospital to Herning or Cottle Substations

A new transmission line between these substations will:

- Increase the capacity to deliver power to key load centers
- Satisfy increasing MEA load growth
- Improve MEA's System Reliability
- Provide system redundancy between Substations
- Begin implementation of an overall plan to upgrade MEA's capacity and system reliability


115 kV DOUBLE CIRCUIT: WOOD
EXISTING SINGLE CIRCUIT TRANSMISSION LINE
138 kV DOUBLE CIRCUIT: WEATHERING STEEL

Bogard Road Route



BOGARD ROAD ALTERNATIVE	
Project Length	12.7
Estimated Number of Parcels	150
Estimated Residences Passed	46
Estimated Businesses Passed	43
ROW Direct Cost	$1,190,000
Construction Dollars	$12,505,000
Demolition Costs	$1,270,000
Order of Magnitude Costs	$14,965,000

MEA

ROUTING ALTERNATIVE

BOGARD ROAD

Pros

- Follows existing transmission line
- Existing easements – requires fewer new easements
- Public acceptance of existing line
- Adds one new circuit
- Necessary for load growth
- Lowest estimated right of way acquisition costs

Cons

- Highest cost
- Replacement of the existing line significantly increases construction costs
- Does not provide system redundancy between substations
- Longest option
- Major outages required during construction
- Most private property easements required
- DOT/PF does not support this route due to the need for future Bogard Road upgrades

Parks Highway Route

Parks Highway Back Lot	
Project Length	6.7
Estimated Number of Parcels	62
Estimated Residences Passed	29
Estimated Businesses Passed	72
ROW Direct Cost	$5,900,000
Construction Dollars	$7,500,000
Order of Magnitude Costs	$13,400,000

Herning Substation

Lazelle Substation

Hospital Substation

2/28/13

N

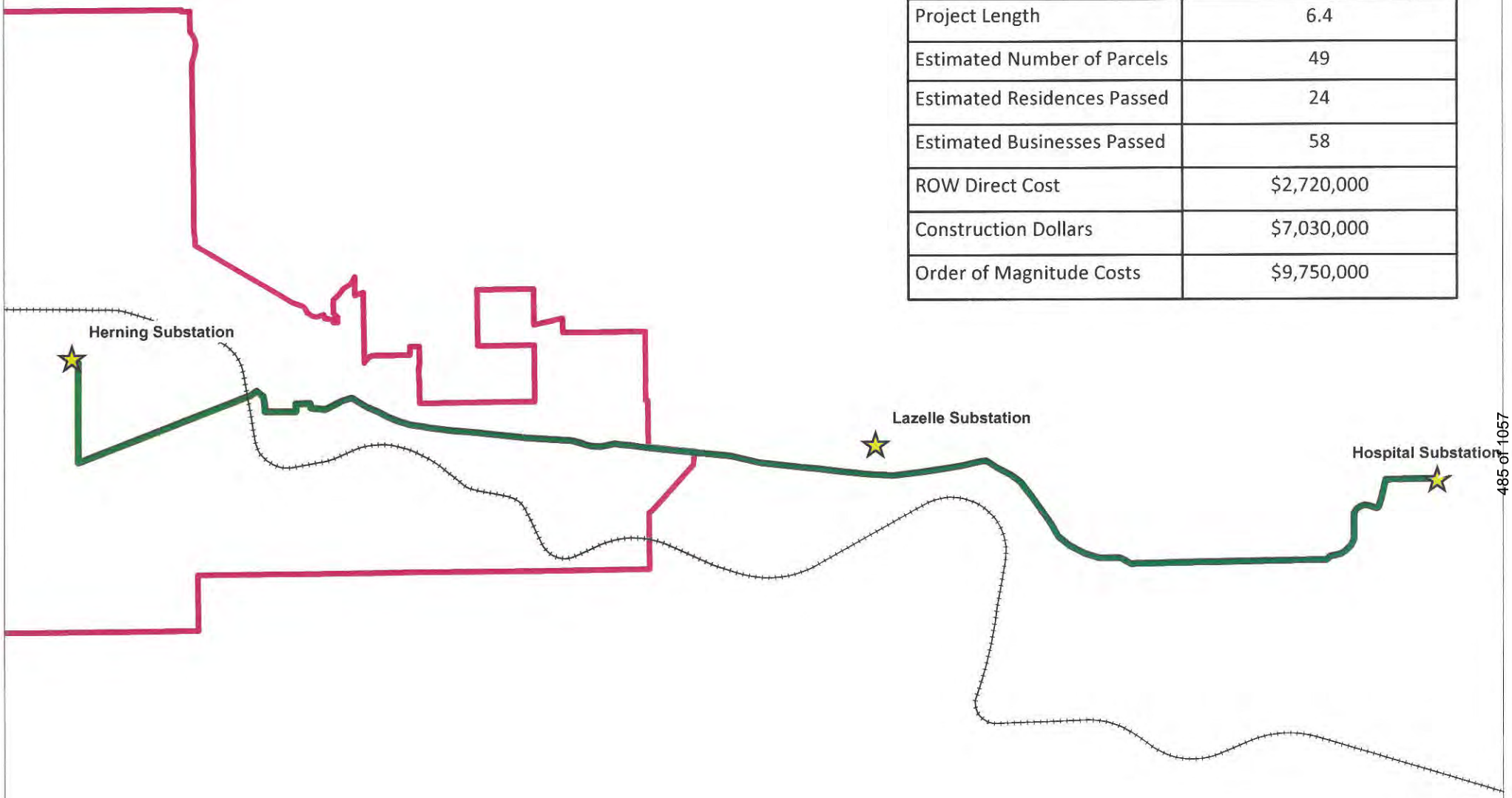
0 0.4 0.8 1.6 Miles

Legend

- AK Railroad
- Parks Highway Route
- City of Wasilla

Original Parks Highway Route

Original Parks Highway Route	
Project Length	6.4
Estimated Number of Parcels	49
Estimated Residences Passed	24
Estimated Businesses Passed	58
ROW Direct Cost	$2,720,000
Construction Dollars	$7,030,000
Order of Magnitude Costs	$9,750,000



2/28/13

N

0 0.4 0.8 1.6 Miles

Legend

- AK Railroad
- Primary_Route Original
- City of Wasilla

Original Parks Highway Route

Project Length (miles)		6.4
Number of Parcels		49
Estimated Residences Passed		24
Estimated Businesses Passed		58
Estimated ROW Direct Cost	$	2,720,000
Construction Cost	$	7,030,000
Total Cost (including ROW)	**$**	**9,750,000**

Parks Highway Back Lot Line Route

Project Length (miles)		6.7
Number of Parcels		62
Estimated Residences Passed		29
Estimated Businesses Passed		72
Estimated ROW Direct Cost	$	5,900,000
Construction Cost	$	7,500,000
Total Cost (including ROW)	**$**	**13,400,000**

Original Parks Highway Underground Route

Underground (within City of Wasilla)

Project Length (miles)		6.4
Number of Parcels (assume Parks Hwy Route)		49
Estimated Residences Passed		24
Estimated Businesses Passed		58
Estimated ROW Direct Cost	$	2,720,000
Underground Construction Cost (3 miles)	$	34,320,000
Overhead Construction Cost (3.4 miles)	$	3,882,239
Total Cost (including ROW)	**$**	**40,922,239**

Cottle Route

Project Length (miles)		12.1
Number of Parcels		58
Estimated Residences Passed		65
Estimated Businesses Passed		32
Estimated ROW Direct Cost	$	2,050,000
Construction Cost	$	11,875,000
Total Cost (including ROW)	**$**	**13,925,000**

Bogard Road Route

Project Length (miles)		12.7
Number of Parcels		150
Estimated Residences Passed		46
Estimated Businesses Passed		43
Estimated ROW Direct Cost	$	1,190,000
Construction Cost	$	13,775,000
Total Cost (including ROW)	**$**	**14,965,000**

MEA

ROUTING ALTERNATIVE

PARKS HIGHWAY
BACK LOT LINE

Pros

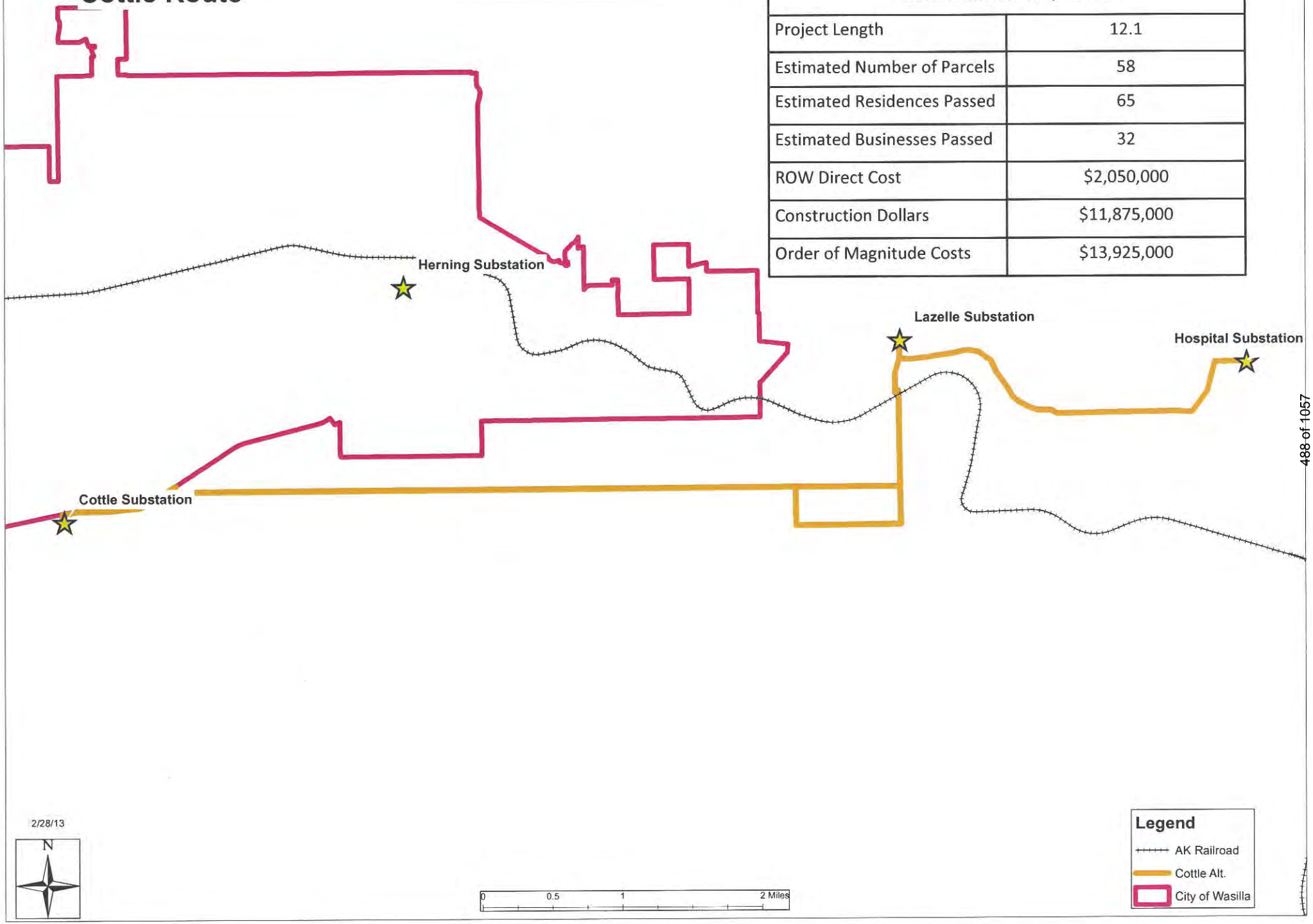
- Shortest route
- Improves system reliability
- Provides system redundancy between substations
- Requires minimal easements acquisitions along Parks Highway portion
- Less acquisition parcels than Bogard Road Alternative
- Less residential property affected.
- Less clearing required along commercial properties
- Necessary for load growth
- Underbuild distribution available for commercial development
- DOT/PF supports this route

Cons

- Right of way acquisition estimates significantly more costly than other alignments
- New 100 foot wide easements required from several owners
- Additional routing approval for alignments within City of Wasilla for before final route determination

Cottle Route

Cottle/Fairview Loop Route	
Project Length	12.1
Estimated Number of Parcels	58
Estimated Residences Passed	65
Estimated Businesses Passed	32
ROW Direct Cost	$2,050,000
Construction Dollars	$11,875,000
Order of Magnitude Costs	$13,925,000



MEA

ROUTING ALTERNATIVE

COTTLE SUBSTATION – FAIRVIEW CORRIDOR

Pros

- Improves system reliability
- Least acquisition parcels of the three alternatives
- Requires minimal easements acquisitions along Parks Highway portion
- Alignment follows section line easements
- Minimal potential conflicts with Fairview Loop Road upgrade
- Necessary for load growth
- Provides electrical distribution for future development
- Least visible alternative from public rights of way

Cons

- More clearing required in areas not adjacent to existing roadways
- Right of way acquisition significantly more costly than other alignments
- 100 foot wide easements may be required from several owners

Executive Summary

The first two of the three primary components to the City of Wasilla's Comprehensive Plan are: to ensure Wasilla remains a regional commercial center and to maintain quality of life for Wasilla residents.

Power supplied by MEA plays a key role in in the commercial sector economy of Wasilla and a supporting role in the quality of life of Wasilla's residents. MEA's proposed project strongly supports and enhances Wasilla's role as a regional commercial center.

- With its rapid commercial growth and increase in population, the City of Wasilla and its immediate surrounding area is the largest consumer of power in the Matanuska-Susitna Valley.

- Reliable, affordable electricity is the cornerstone for economic development.

- Commercial and industrial users on average consume 8 times the power of residential consumers.

- Future growth of Wasilla's commercial and industrial sectors will continue to increase the demand for safe, reliable and affordable power in the City of Wasilla.

- Herning Substation is the primary supply point for power to the City of Wasilla. As such any transmission line route to Herning Substation will, by necessity, pass through the City of Wasilla. The Parks Highway corridor is the only route available in an established commercial and transportation corridor. Any other route selected will impact residential properties which will affect the quality of life of the residents of that area and would be inconsistent with the City's stated goal of maintaining a quality of life of its residents.

Preface to Comments on Previously Proposed Findings of Fact:

In its findings of fact for a prior request the planning staff made the following quotation about the Comprehensive Plan:

"The over-arching vision outlined in the Comprehensive Plan is to take the necessary steps to ensure the City remains the region's major commercial center, maintain the quality of life for the residents, and enhance the visual attractiveness of the community."

Taken from the City's quotation, the three primary components of the Comprehensive Plan's Vision are (1) to ensure the City remains the region's major commercial center, (2) maintain the quality of life for the residents, and (3) enhance the visual attractiveness of the community.

(1) Regional Commercial Center
(2) Maintain Quality of Life
(3) Enhance visual attractiveness of the community

As there often are, land use decisions result in competing components of the comprehensive plan. That is especially the case with public infrastructure – everyone wants the benefits, but they are generally reluctant to accept any of the impacts that go with it. Consequently there must be a balancing of those benefits and impacts especially as to the application of goals of the Comprehensive Plan.

From MEA's perspective, the staff's analysis devoted the bulk of its commentary toward the impacts of the third element, visual attractiveness, and summarily dismissed any benefits of MEA's proposed project on the first two elements, regional commercial center and maintain quality of life. MEA provides the following information for the Planning Commission to assess in its review of the application.

Why Hospital Substation to Herning Substation:

Wasilla is the fastest growing area in Alaska and the consumer of the largest electrical load in the Matanuska-Susitna Valley. From 2005 to 2012 Wasilla's increase in power usage rose from 16.5 to 23 megawatts, a 6% load growth compared to the overall system load growth of 1% per year. Projections are that load growth will grow at a similar rate through 2020. Based on census data the estimated population increase during that period was approximately 4% per year, leaving another 2% of the load growth attributable to increased commercial usage.

Herning Substation is the primary supplier of power to the City of Wasilla and the immediately adjacent areas. Currently Herning Substation is operating at 12% over its desired system operating capacity. Although Herning still has capacilty available, operating at the higher than desired system operating capacity increases the potential for outages and thereby decreases reliability. Adding the additional redundant circuits into Herning Substation reduces the chance for outage by supplying another alternative source of power to the substation in the event of an outage elsewhere in the system.

Wasilla's continuing commercial growth as well as its residential growth, is the driver behind MEA's need to improve the capacity of the Herning Substation. As Wasilla strives to increase its commercial and industrial sector, the commercial load growth will rise substantially more than that of the residential growth. One MEA study indicates that commercial users average kilowatt hours (5,970 kwh) are 8.2 times higher than residential users (728 mwh). Future growth of the commercial and industrial sectors in Wasilla will place even greater demands for power from the Herning Substation.

What services does the Project Provide:

The proposed transmission line provides improved electrical service to the Wasilla community in two ways. The 115kV double circuit increases the reliability and capacity of transmitting power to the Herning Substation as well as increases the number of redundant circuits providing power to the substation. The additional redundant circuitry greatly reduces the potential for power outages in the City of Wasilla.

For properties in the vicinity of the transmission line, the underbuild portion of the line will provide high capacity three-phase distribution, a significant reduction to the development costs associated with bringing three-phase power to a new site. Although the bulk of the proposed corridor is already commercially developed, there are eight undeveloped parcels and several large tracts of undeveloped land just outside the corridor that will benefit from the ready availability of high capacity distribution.

What are the Economic Benefits of the Project:

From an economic standpoint, there are many benefits to consider. These range from regional economic development potential to reduction of development costs to individual developers.

Access to power is essential to the viability and expansion of commercial and industrial sectors of Wasilla's economy. Throughout the Comprehensive Plan there is discussion that Wasilla's goal for economic independence is to develop

strong and viable commercial and industrial sectors to provide the jobs its residents need. Numerous economic studies have been conducted that show one of the primary drivers of economic development is the availability of reliable, economic low cost power needed for commerce and industry. Wasilla may have the population needed, but without one of the other major components, reliable power, that economic growth may lag. As the substation at the hub of Wasilla's growth, Herning Substation has the ability to reliably serve the capacity demands of the City of Wasilla and provide that necessary component for economic growth.

At the other end of the spectrum, installation of utilities is a major cost for developers of commercial and industrial properties. Availability of three phase distribution power from a nearby circuit means many thousands of dollars less in development cost. Often the cost of utilities is a detriment or delaying factor in the development process. The three phase circuit on this project will pass eight undeveloped properties and numerous other pieces of undeveloped land one tier of lots back from the alignment. Construction of this project will enhance the development potential of these properties.

One of the City's major project is the revitalization of the Core Area of Downtown Wasilla. Upgrading the businesses and residences in downtown Wasilla will entail upgrades in electrical services, another increase on the load demand. Although the transmission line routing will not serve the downtown core, the increase in capacity and reliability of power available from the Herning Substation will be available to benefit the developers and re-developers of that area. Reliable, economic power is a key component in the revitalization effort as well.

How does the Project Maintain Quality of Life

Consumers are using more and more power to support their lifestyles. There has been a tremendous increase in electronic devices in homes and offices. Revitilization of the core area is another example where homes and offices will be modernized to provide power for all of these new technological advances. Power will be a necessary component for those needs. As mentioned above, commercial use requires more power. Stores are rusingmore electronic displays to attract customer attention. These displays and other electronic devices are consuming a greater amount of power. All of these play into the maintenance of the quality of life, either directly for the consumer, or indirectly to the business seeking to attract the consumer.

As covered in the economic benefits section abovem, reliable economic power is a key component of economic growth. Wasilla is seeking to create jobs in the community so more of its residents have a chance to earn their living in the community where they live. Jobs from that economic growth are essential to

maintaining Wasilla's quality of life. MEA believes providing economic reliable power is its best effort in the maintenance of the quality of life of its members.

What are the impacts to visual enhancement of the City?

MEA acknowledges and agrees there will be aesthetic impacts to the view shed; however, those impacts need to be weighed against the benefits of the project and necessity to balance the "least private injury with the greatest public good" an obligation placed on public utilities.

In weighing the impacts of the proposed alignment compared to all the other alternatives, MEA proposed this route for the following reasons:

(1) use of an existing transportation corridor reduces the required private property easement widths by one-half,
(2) the Parks Highway is already a fully developed transportation corridor devoted to commercial use,
(3) this alignment has the least impact on future infrastructure development of any of any of the alternative transportation corridors,
(4) least private properties affected of any alternative,
(5) least impact on current and future use of adjacent properties, and
(6) the shortest, most economical route.

Location of the transmission line in the outer edges of a transportation corridor requires half of the necessary right of way, with the existing transportation corridor providing the other half. Easements needed from adjacent private property owners are reduced from 100 feet to 50 feet. Based on design standards the Parks Highway corridor is fully developed for the foreseeable future with no significant modifications expected by the Alaska Department of Transportation and Public Facilities (DOTPF) and is available for construction of a transmission line under DOTPF guidelines. DOTPF considers the Palmer Wasilla Highway Extension to have sufficient right of way to permit a transmission line.

Assuming that the proposed project centerline will be located in the highway right of way, the maximum easement width required from the adjacent property would be 50 feet. The first 20 feet of that easement area is clear zone from the conductor as required by the National Electric Safety Code. The 20 foot clear zone requirement is completely within the City's 25 foot building setback which already precludes buildings in the setback. Property owners will be able to continue their present uses. The remaining 30 feet is to assure there will be no structures or trees capable of falling onto the poles or conductors. For the developed commercial properties that additional 30 feet will not impact the current use of the site since they all have been cleared and their present uses do not pose any threat of falling onto the pole or conductor.

The benefits of available, reliable economic energy will have a measurably greater positive impact on the market value and future development of the nearby vacant commercial properties than the perceived economic impacts of the transmission line on the loss of visibility.

Why can't the transmission line be buried?

One request continues to surface: underground the transmission line. Unfortunately this is not a viable economic solution. For the three miles in the City of Wasilla our current substation consultant, Stanley Consultants, a large lower 48 engineering firm, provided an order of magnitude cost of $34 million. An underground transmission line has significantly greater issues than an underground distribution line. Distribution lines serve relative few customers and outages are commonly resolved by splicing in an above ground segment and putting it in core-flo piping until it can be buried in the spring. On the other hand underground transmission serve substations which in turn serve large numbers of customers. Transmission lines require a concrete vault every 2000 feet. These vaults fill with water and freeze in the winter. In the event of a fault, which the time to find the fault and mean time to repair it is considerably longer (days rather than the hours involved for overhead facilities). If the fault in the line is between vaults, splicing the underground transmission line is a difficult process. Putting a temporary transmission line on the ground surface poses greater risks of liability than a prudent utility should take. For these reasons MEA has not and does not propose undergrounding any portion of the line.

Conclusion:

MEA is well aware of and shares the concerns of the City of Wasilla, the businesses, and the individuals along the proposed route about the visual impact of constructing a transmission line with 65 to 80 foot poles. MEA has not taken the routing effort lightly. It considered many factors before proposing the Parks Highway as the route for interconnecting Hospital Substation with Herning Substation.

Just as the City of Wasilla has a fiduciary obligation to make decisions in the best interest of its citizens, MEA has a similar obligation to its members, who include not only the citizens of Wasilla but electric consumers throughout the region. As a public utility MEA must also weigh the greatest public good versus the least private injury, an obligation that extends across all the alternatives being considered. MEA recognizes the impacts of the proposed project; however, as with the Comprehensive Plan, MEA has weighed the impacts and benefits and believes the Parks Highway Corridor provides both the greatest public good with the least private injury of all the alternatives and meets MEA's fiduciary obligations to its members.

RESPONSES TO PROPOSED FINDINGS OF FACT

MEA's specific responses to findings of fact for which planning staff responded negatively or stated that "This criterion is not met" follow:

FINDING 16.16.050(1) & (5) Neighbors/Neighborhoods. *Due deference has been given to the neighborhood plan or comments and recommendations from a neighborhood with an approved neighborhood plan.*

MEA Comments:

As indicated in the proposed findings: "There are no approved neighborhood plans for neighborhoods along the proposed transmission line route nor does the route propose to go through established neighborhoods." When MEA consultants met with the City of Wasilla Public Works Director in its early route analysis, two locations of concern were discussed, the Cottonwood Creek Intersection and the central downtown area near the intersection of Knik Goose Bay Road and the Parks Highway. Both of those areas were avoided in the route studies. With minor exceptions, the proposed routing follows a transportation corridor through established commercial areas rather than disrupting the neighborhoods identified in the City of Wasilla's planning documents.

In its comments on the finding, Planning Staff raised concerns about the route selection process. Since the initial plan application, MEA has held two more public open houses and a public hearing to solicit additional public input on three alternative routing options and this proposed Parks Highway alignment. Those public meetings were highly publicized and well attended. A summary of the comments from those hearings will be made available to the Planning Commission.

FINDING A *16.16.050(2) Plans.* *The proposal is substantially consistent with the city comprehensive plan and other city adopted plans.*

Finding: This criterion is not met. The proposed route is not substantially consistent with the City Comprehensive Plan, Land Development Code, Mission Statement, or City Council Goals and Initiatives. The over-arching vision outlined in the Comprehensive Plan is to take the necessary steps to ensure the City remains region's major commercial center, maintain the quality of life for the residents, and enhance the visual attractiveness of the community.

Specifically, the proposed transmission lines are inconsistent with the following purpose statement, goals, objectives, and/or actions and other policy statements within the Comprehensive Plan (copies of the applicable sections are included in the staff report packet of information).

As stated in the preface, MEA agrees that the plan has three major components, regional commercial center, quality of life, and visual attractiveness. Each of the sections referenced by the planning commission has a combination of the three goals.

MEA strongly believes the proposed project meets the goals of the first two components, the regional commercial center and quality of life. This project improves MEA's system by assuring that safe reliable power will be delivered directly to the area that needs it most, the City of Wasilla and its immediately surrounding neighbors. Affordable reliable power is one of the major factors in promoting and sustaining economic growth. Sustained economic growth is necessary to help Wasilla as it transitions from a bedroom community to an economically independent community. Its own industrial and commercial sector will provide jobs and economic prosperity for its citizens and will highly enhance the quality of life for Wasilla residents.

With respect to the third component, visual attractiveness, MEA is seeking to use a fully developed transportation corridor through a commercial area heavily developed with department stores, shopping malls and car dealerships. While this route of the transmission line does not meet the visual attractiveness standard, it serves the residents with the demand for the power and has the least economic impact to the adjacent owners. Although it does not eliminate the visual effect, placement of the transmission line along the north side of the highway provides partial mitigation by allowing development on the south side of the highway to incorporate unaffected views of the Chugach Mountains.

In addition to the above three components, the goals, objectives and actions of Goal 4.4 also addressed property owners' rights and the process.

Throughout its analysis of routing options, MEA has placed strong emphasis on causing the least impact to the property owners affected by the transmission line routing, most particularly to those properties requiring easements. The preface discusses MEA's analysis of the difference in impact on adjacent landowners.

Potentially affected property owners along the four alternatives have been notified and have had an opportunity to express their concerns and opinions. Information at the open house meetings has identified potential alignments, estimated project costs for each alternative, the number of businesses and residences passed by each project, the estimated number of potential easement acquisitions, MEA system requirements and the pros and cons of each alternative. As a result, MEA and its consultant have fielded numerous phone

calls and e-mails from adjacent property owners and have received written comments at the hearings and on the web.

When it comes to infrastructure that serves all the residents of the area, MEA believes it has achieved a balance between conflicting land use goals; however, determining whether that balance exists or not lies with the Planning Commission. A critical component in MEA's routing process is the Planning Commission's weighing of the benefits and the impacts to determine if the City of Wasilla will permit a transmission line along the proposed route, and if so, under what conditions. Denial of a permit or restrictions on the project that affect its viability must be determined before MEA can select a final route.

FINDING B *16.16.050(2) Plans.* *It is also substantially inconsistent with the City Land Development Code. Section 16.040.010 states that the Code's purpose is:*

A. To achieve the goals and objectives, and implement the policies, of the Wasilla comprehensive plan;
B. To ensure that future growth and development in the city is in accord with the values of its residents;
C. To identify and secure, for present and future residents, the beneficial impacts of growth;
D. To ensure public involvement in permitting, planning and zoning decisions;
E. To identify and avoid, mitigate or prohibit the negative impacts of growth; and
F. To ensure that future growth is of the proper type, design and location, and is served by a proper range of public services and facilities.

MEA Comments:

Planning staff raised concerns with landscaping impacts and loss of tax revenue resulting from the impact on the adjacent properties. As proposed 22 properties will need easements. Three properties between the Palmer Wasilla Extension and Herning Substation already have 80 foot wide transmission line easements that will require an additional 10 feet on the west side of the existing easement. Of the remaining 19 properties requiring new easements for the project, eight are undeveloped and four of those eight have been cleared of vegetation. All 11 of the developed properties requiring easements were developed prior to the enactment of the landscaping code and do not currently have landscaping in the proposed easement area. Four undeveloped properties are along the Parks Highway, between Sears and Nye Ford, one is on the Old Matanuska Road, and three undeveloped properties west of Home Depot on the Palmer Wasilla Extension.

Description	Acres	Highway	Vacant - Status
Section 12 Lot D14	16.86	Parks Highway	Un-subdivided, mostly cleared
Section 12 Lot D12	4.96	Parks Highway	Un-subdivided, uncleared
Section 12 Lot D13	22.22	Parks Highway	Un-subdivided, uncleared
Mtn Village Block 3 Lot 14	2.63	Parks Highway	Subdivided, cleared
Creekside Plaza Rsb L/2 Lot 2A	13.64	Old Matanuska	Subdivided, sewer easement, uncleared
Section 10 Lot D10	10.41	Palmer Wasilla Extension	Un-subdivided, cleared
Section 10 Lot D5	61.78	Palmer Wasilla Extension	Un-subdivided, uncleared (Same owner as D11)
Section 10 Lot D11	3.81	Palmer Wasilla Extension	Un-subdivided, uncleared (Same owner as D5)

With the exception of Lot 14 of Mountain Village, which is already subdivided, cleared and owned by the adjacent car dealer holding company, the remaining parcels range from 4.96 acres to 65.59 (Lots D5 & D11-- D5 is a triangular lot in front of D11 and would realistically be developed as a single site.) Impact of easement acquisition on the potential landscaping requirements for these properties will be evaluated by the appraiser in determining compensation.

Any impact to future tax revenues is highly speculative, considering the size and variety of potential uses. Within the range of potential uses, some properties may be developed that do not produce tax revenues.

FINDING 16.16.050(11) Drainage. *The proposed use shall provide for the control of runoff during and after construction. All roads and parking areas shall be designed to alleviate runoff into public streets, adjoining lots and to protect rivers, lakes and streams from pollution. Uses may be required to provide for the conservation of natural features such as drainage basins and watersheds, and land stability.*

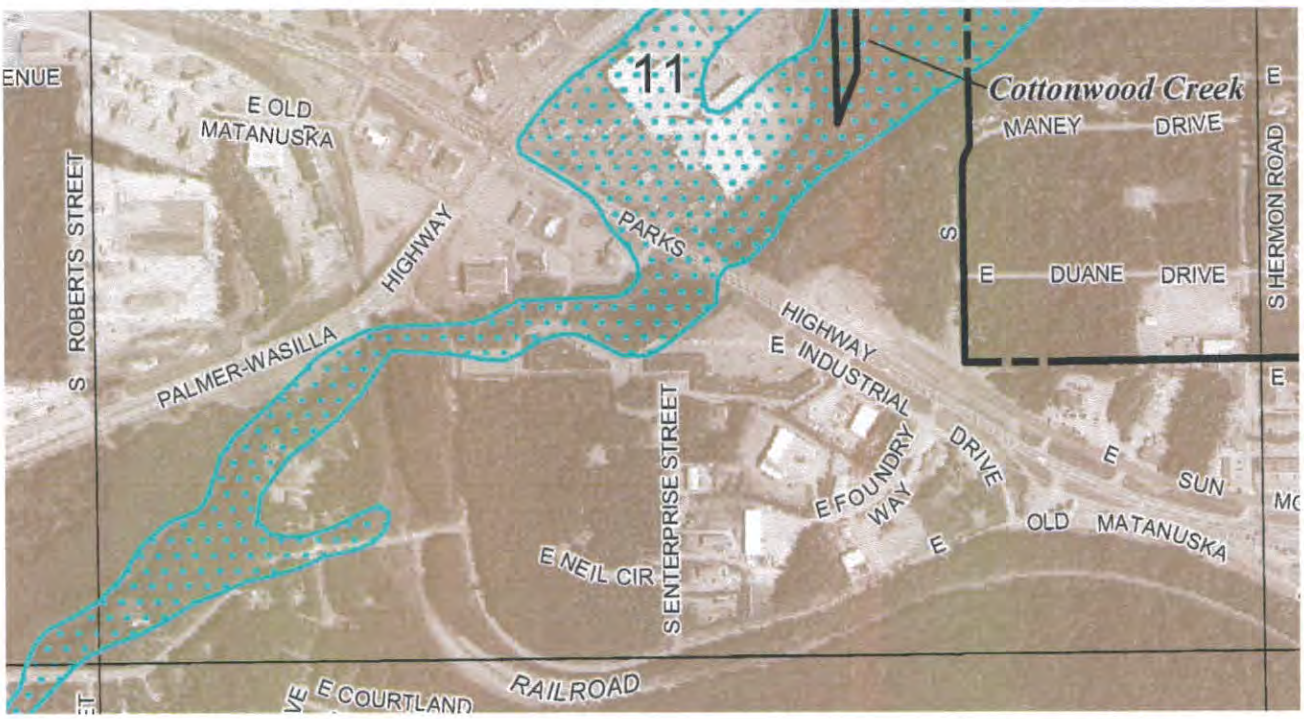
This criterion is not met. Although the proposed transmission lines should not create runoff during or after construction, the site plan shows the proposed transmission lines crossing Cottonwood Creek and, according to the Borough's comments, will cross properties within a flood zone.

Also, the City's Land Development Code prohibits the clearing of native vegetation and/or installation of any footings within 75 feet of the mean high-water mark of a water course or water body, including lakes, streams, and rivers. Since the applicant's permit application or site plan did not address this issue, staff is unable to determine whether there will be negative impacts to these areas. However, it is assumed that there will be negative impacts since

they are proposing a 100 feet wide right-of-way easement with all vegetation removed within the easement. This proposal will require clearing in areas that are within wetlands and also within 75 feet of the mean high-water mark of water bodies, which is prohibited by the City Code.

MEA Comment:

The FEMA Firm Map depicting the floodplain below shows that the point at which the transmission line is proposed to cross at its narrowest point, approximately 200 feet wide. Individual design details are not prepared for route selection studies; however, structures proposed for this project are typically 600 feet apart. The entire segment along the Old Matanuska Road is only 503 feet, easily allowing for structure placement outside of the Cottonwood Creek Floodplain. The crossing area is within existing clearing for the Old Matanuska Road bike trail. If necessary to mitigate the clearing requirements, taller structures or other design features can be used for the single span necessary to cross this area. Alternatively, a waiver for the limited clearing could be granted, especially in consideration of the approved development on the north side of the highway in the same floodplain.



FIRM MAP NO. 02170C8085E

FINDING *16.16.050(15) Landscaping.* *The proposed use shall be designed in a manner that minimizes the removal of trees and vegetative cover, and shall*

conform to the standards in this title concerning the provision and maintenance of landscaping, and any landscaping plan that is required for the proposed use under this title. The approval authority also may condition approval on the provision of the following:
a. A fenced storage area for common use, adequate to store boats, trailers, snowmobiles, recreational vehicles and similar items.
b. Adequately sized, located and screened trash receptacles and areas.

This criterion is not met. MEA's requirement for a 100 feet wide right-of-way easement that is cleared of vegetation, shrubs, or trees is inconsistent with the City's required landscaping for commercially zoned properties.

MEA Comment:

MEA stands by its assertion that code provision *WMC 16.33.030(F)* and *16.33.030(I)* apply. To the extent application of the policies enacted in *WMC 16.33.030(F)* and *16.33.030(I)* reduce the potential development footprint for the undeveloped properties based on other provisions in *WMC 16.33* and *16.24.040(D)(4),* MEA will compensate the owner for any loss in value resulting from the application of the ordinance. Beyond that it is speculative to assume that easement on properties of the sizes involved will impact on sales tax revenues when there are so many variables to the possible site development and use.

With respect to the examples provided in the findings, the findings do not state the obvious. The existing trees were not in compliance with *WMC 16.33.030(F)* and placement of shrubs, rocks, and decorative fencing does not comply with *WMC 16.33.030(F).*

Section 16.33.030(F). Utility Easement Landscaping. Landscaping within public utility easements is encouraged but shall be limited to topsoil, seed, flower plantings, small shrub plantings or native vegetation.

FINDING 16.16.050(19) ***Appearance.*** *The proposed use may be required to blend with the general neighborhood appearance and architecture. Building spacing, setbacks, lot coverage, and height must be designed to provide adequate provisions for natural light and air.*

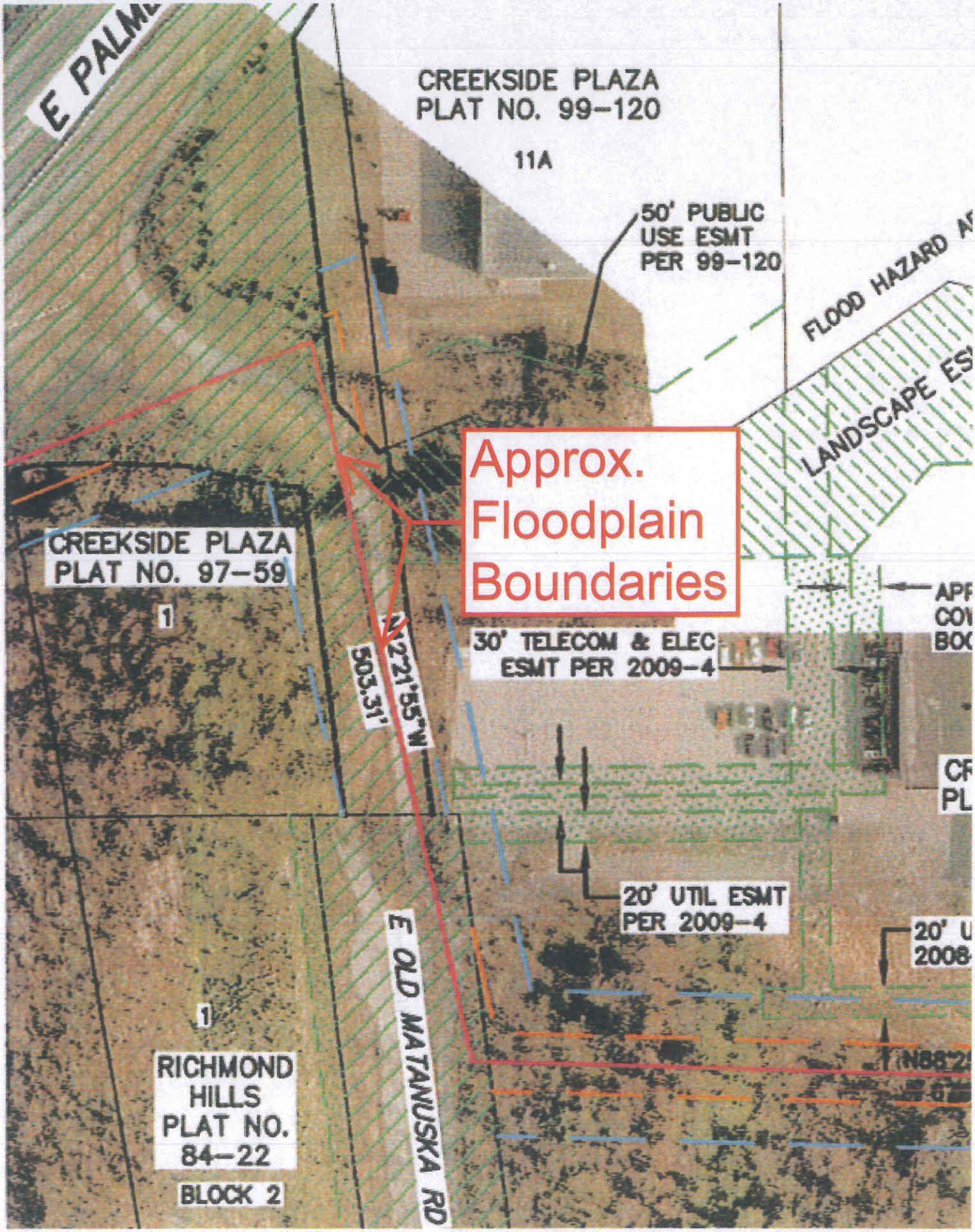
<u>This criterion is not met</u>. The proposed 80 feet tall transmission lines with the 100 feet wide right-of-way easement cleared of vegetation will cause significant visual impact on the scenic views along the proposed route and will decrease the attractiveness of the corridor if the vegetation is removed within the required utility right-of-way easements.

MEA Comments:

As most of the code was drafted primarily for individual lot uses and not utilities, the provisions "Building spacing, setbacks, lot coverage, and height must be designed to provide adequate provisions for natural light and air" of this section are largely inapplicable.

The image painted in the findings of a 100 foot wide swath where all vegetation will be cleared is misleading. With the exception of a few trees planted in the median near Lowes and the Party Store, of the three miles within the City limits approximately 3/8^{ths} of one mile (less than 1/8th of the project) has not already been cleared of all vegetation. Potentially only one property will have a 100 foot wide clearing, the land behind the Alaska Club adjacent to the Old Matanuska Road, which is out of sight of the public. Of the other uncleared properties the maximum width cleared should not exceed 50 feet, since the already cleared highway rights of way provide half the needed width. As with every other developed property along this route, during the development process the native trees are removed to provide the developer with unfettered control of the site. The small amount of clearing required for each of these properties are more of a benefit than a detriment to the commercial property owners by reducing their future development clearing costs.

MEA is cognizant of the general appearance and visual implications of the transmission line. MEA chose this routing primarily for the fact that it is a commercially developed transportation corridor with mostly businesses that are already subject to 25 foot setbacks. The existing setbacks minimize the impacts to the adjacent properties. The viewshed is an amenity that will be affected by the tall structures, but there will be very limited economic impact and no likely change in use or revenues of the businesses along the route as a result of a transmission line.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MATANUSKA ELECTRIC ASSOCIATION

MATANUSKA ELECTRIC ASSOCIATION, INC.

Office of General Manager
Post Office Box 2929
Palmer, Alaska 99645

FACSIMILE TRANSMITTAL SHEET

PHONE: (907) 761-9212 FAX: (907) 761-9368

DATE: April 3, 2013

TRANSMIT TO: FAX NUMBER:

Mayor Verne Rupright (907) 373-9096
City of Wasilla
Office of the Mayor

RECEIVED
APR - 3 2013
Office of the Mayor
City of Wasilla

FROM: Donald W. Zoerb
Assistant General Manager/CFO

SUBJECT: Letter of Authorization for MEA Director of Engineering

MESSAGE:

Total number of pages transmitting: 2 (Includes Cover Sheet).
If transmission is incomplete, please call Dawn Baham at (907) 761-9285.

RECEIVED
APR 03 2013
Planning Office
City of Wasilla

MEA
MATANUSKA ELECTRIC ASSOCIATION

April 3, 2013

Honorable Mayor, Verne Rupright
City of Wasilla
290 E. Herning Ave.
Wasilla, AK 99654-7091

RE: Letter of Authorization for MEA Director of Engineering

Dear Mayor Rupright;

I, Donald W. Zoerb, as Assistant General Manager and Acting General Manager for and on behalf of Evan J. Griffith for General Manager of Matanuska Electric Association Inc. (MEA), do hereby certify that Gary Kuhn, Director of Engineering, is a duly authorized representative of MEA, and may sign any and all documents relative to permitting within the City of Wasilla.

Sincerely,

Donald W. Zoerb
Assistant General Manager/CFO

cc: City Planner

MATANUSKA ELECTRIC ASSOCIATION

MATANUSKA ELECTRIC ASSOCIATION, INC.

Office of General Manager
Post Office Box 2929
Palmer, Alaska 99645

FACSIMILE TRANSMITTAL SHEET

PHONE: (907)761-9212 **FAX:** (907)761-9368

DATE: April 18, 2013

TRANSMIT TO: **FAX NUMBER:**

Tina Crawford
City Planner
City of Wasilla Planning Department

(907)373-9021

FROM: Gary Kuhn, P.E.
Director of Engineering

MEA
MATANUSKA ELECTRIC ASSOCIATION

April 18, 2013

Tina Crawford
City Planner, City of Wasilla Planning Department
290 E. Herning Avenue
Wasilla, AK 99654

Ms. Crawford:

Thank you for taking the time during our April 9th meeting to discuss the timeline for the City of Wasilla Planning Commission review of MEA's application. It is our understanding that we are scheduled for the May 14, 2013 City of Wasilla Planning Commission meeting. As a result of your offer we would like to engage the Planning Commission as a follow up to the May 14th meeting, should the Commission want more than one meeting to discuss this issue. We request that you schedule a follow-up meeting with the Commission for May 21st or earlier if possible. If this additional meeting is not needed it can of course be cancelled.

Thank you for your assistance.

Regards,

Gary Kuhn, P.E.
Director of Engineering

Tina Crawford

From: Dan Beardsley <dbeardsley@esgrp.net>
Sent: Tuesday, April 23, 2013 4:24 PM
To: Tina Crawford
Subject: Matanuska Electric Association - Hospital to Herning 115 kV Transmission Line Applications - Route Study Report
Attachments: MEA-Hospital to Herning Analysis of 5 Alternatives.pdf

Tina,

Attached is an electronic copy of the Hospital Substation to Herning Substation Transmission System Route Selection – Analysis of Five Routing Options and Selection of Preferred Route. The Hospital Substation to Herning Substation Transmission System Route Selection – Analysis of Parks Highway Corridor Option to Determine Optimal Alignment will follow by a separate e-mail due to size. Hard copies of both reports were submitted with the original application.

Please include these in the application package.

Dan Beardsley