

**PLANNING DEPARTMENT
CURRENT PLANNING STAFF ANALYSIS
PLATTING**

DATE: January 5, 2026

CASE: S12867
Holtan Hills Subdivision, Phase I,
Lots 1 through 19, Block 1, Lots 1 through 11, Block 2, Lots
1-9, Block 3, and Tracts 1A and 1B

REQUEST: Subdivision of one (1) tract into thirty-nine (39) lots and two (2) tracts with the following variances:

Variance 1: AMC 21.08.030L.1., Lot Frontage and Access-
All lots shall have frontage on a street

Variance 2: AMC 21.08.040A.1., Dedication of Streets-
All street rights-of-way shall be dedicated to the public

Variance 3: AMC 21.08.030F.6., Cul-de-sacs to exceed 600 feet

RECOMMENDATION: Approval of the Plat, Phasing Plan, and Variances 1, 2, 3

PETITIONER: CY Investments, LLC

REPRESENTATIVE: Tony Hoffman, The Boutet Company, Inc.

COMMUNITY COUNCIL: Girdwood Board of Supervisors

TAX IDENTIFICATION: 075-311-06-000

UNDERLYING PLAT: 2024-18

GRID: SE4517

SITE

Area: ± 16.13 acres

Utilities: Public water, public sanitary sewer, and on-site wells

Topography: Sloping southeast

Vegetation: Natural, undeveloped properties

ZONING: GOS (Girdwood Open Space) District,
GIP (Girdwood Institutions & Parks),
gR-3 (Single-Family/Two-Family Residential) District.

COMPREHENSIVE PLAN

Land Use Classification: "Moderate-Intensity Residential", Public Lands & Institutions and Open Space" per the *Girdwood Comprehensive Plan*

SURROUNDING AREA

	<u>NORTH</u>	<u>EAST</u>	<u>SOUTH</u>	<u>WEST</u>
Zoning:	GOS/gR-3	GOS	GOS/GIP	GOS
Land Use:	Open Space/ Residential	Open Space	Open Space/ School	Open Space

ATTACHMENTS

1. Parcel Boundary Maps
2. Application
3. Comments
4. Iditarod Trail Background

PROPERTY AND RELATED HISTORY

11-01-05	Zoning	Property zoned GOS (Girdwood Open Space) District, GIP (Girdwood Institutions & Parks), gR-3 (Single-Family/Two-Family Residential) District. 2005-81(s).
5-02-24	Plat	Holtan Hills Subdivision Tracts 1-5.

REQUEST

This is a preliminary plat request to subdivide one (1) tract into thirty-nine (39) lots and two (2) tracts. The requested preliminary plat includes a two-part phasing plan which, in combination, will provide 39 lots for future residential development in Girdwood as part of a development agreement between the petitioner and the Municipality of Anchorage.

The preliminary plat request also includes a request for variances from AMC 21.08.030L.1., Lot Frontage and Access, AMC 21.08.040A.1., Dedication of Streets, and AMC 21.08.030F.6., Cul-de-sacs. Approval of the variances would permit deviation from requirements for all lots to have frontage on a street, from requirements for dedication of all street rights-of-way to the public, and from requirements limiting cul-de-sacs to 600 feet in length. All of the variances are related to the proposed Tract 1B.

The petitioner proposes to build out Tract 1B as a private drive named Holtan Hills Circle. The tract will be a dedicated 50-foot-wide private access tract that will provide physical access to Lots 1 through 9 in Block 3, and possibly Lots 12 and 13 in Block 1. The homeowners association will maintain the private road constructed in the access tract and the tract will not be dedicated public right-of-way. The access tract will allow for more compact placement of structures than a standard right-of-way dedication, lessening disturbance to the steep slopes and to subsurface water and reducing long-term maintenance costs for the municipality.

Tract 1A is an open space tract included for wetland protection purposes, and the thirty-nine (39) lots will be developed as residential lots.

A separate case, Case 2026-0005, is running concurrently with this case and is a request for a conditional use for a planned unit development on this property.

AGENCY COMMENTS

None of the reviewing agencies had any objections to the plat or the variances. Agency requests for plat notes and other advisory comments are as documented in *Attachment 3: Comments*, and are summarized and discussed below in the Staff Analysis section. Also discussed below are platting and design requirements per Anchorage Municipal Code, as noted by several of the agencies.

PUBLIC COMMENTS

On December 9, 2025, the Planning Department mailed 207 notices to, “all persons listed on the records of the municipal assessor as owners of any land within 500 feet of the outer boundary of the land subject to the application,” as required in AMC 21.03.020H.3. The Department also provided notice of the public hearing to the Girdwood Board of Supervisors and posted on the municipal webpage, and the petitioner posted signs advertising the public hearing to fulfill notice requirements. The Department received five comments in response (see Attachment 3: Comments). Comments regarding the platting action were also submitted for concurrent Case 2025-0005 for the conditional use for the Planned Unit Development and are available in staff report attachments for Case 2025-0005. None of the public comments recommended immediate approval of the plat, but rather requested denial of the plat or a pause for revision, further analysis, or redesign. Some of the comments concerned the historic Iditarod Trail and RS2477 trail easement requirements (see Attachment 3: Comments and Attachment 4: Iditarod Trail Background). See Appendix A at the end of this document for a comment response table to public comments.

STAFF ANALYSIS

The petition site is located north of the intersection of Hightower Road and Holtan Hills Road. In 2025, the Municipality of Anchorage completed construction of an access road to the petition site that consisted of 1,300 feet of paved road, sidewalk, and curb improvements.

The proposed development will create 39 residential lots, including two lots for multi-family housing, an internal tract for wetlands conservation, and an additional tract for a private street cul-de-sac. The majority of the subject property is zoned gR-3 (single-family/two-family residential) district. The concurrent request (see Case 2026-0005) for a conditional use for a residential planned unit development (PUD) would allow for an increased residential density and a more efficient mix and higher density land use, with considerations for wetlands, streams, bedrock, and steep terrain. The proposed subdivision plat reflects the proposed PUD lot configurations and sizes, ranging between 6,500 and 48,000 square feet. The PUD flexibility allows the petitioner to provide a variety of lot sizes and configurations not constrained by a set minimum size.

Road Improvements and Dedications

The proposed subdivision has access to Hightower Road, a collector roadway in the *Official Streets and Highways Plan (OS&HP)*. The proposed Holtan Hills Road would be a local road, with alignment at the intersection of Hightower Road. The Department does not recommend improvements to Hightower Road.

MOA Traffic Engineering determined that the trip generation from this development (approximately 600 trips per day) would not trigger the need for a traffic impact analysis (TIA). It will be a requirement of the plat to dedicate 60 feet of right-of-way and construct the remainder of Holtan Hills Road as a strip-paved road, in accordance with AMC 21.09.070F.5.

Holtan Hills Circle is located within Tract 1B. Private Development and Traffic Engineering recommend that Tract 1B consist of a 50-foot-wide dedicated corridor for the private street with a 50-foot radius dedication for the cul-de-sac bulb. The petitioner shall construct Holtan Hills Circle as a 20 to 22-foot-wide, strip-paved road, in accordance with AMC 21.09.070F.5, with 3.5 to 5-foot shoulders, ditches, and with a 39.5-foot radius cul-de-sac. This will include minimum horizontal curve radius of 150 feet per Table 1-9 of the Design Criteria Manual (DCM).

Final plat approval is contingent upon the petitioner entering into a subdivision agreement with Private Development for the required public improvements. The improvements shall be as recommended by the departments. This agreement shall also include a comprehensive site grading and drainage plan. Any required drainage improvements shall follow the most current Design Criteria Manual (DCM) and the Drainage Design Guidelines (DDG).

Drainage

In their comments, WMS requested resolution with Private Development regarding the need for and location of drainage easements. WMS also requested the project design satisfy stormwater treatment and extended detention requirements. These comments are incorporated into the conditions of approval for this preliminary plat.

Iditarod Trail

The Iditarod Trail enters the property at the southeast corner of the subdivision and meanders along the west bank of Glacier Creek on the east side of the development. The *Girdwood Trails Plan* identifies the Historic Iditarod Trail as Existing Class 3 (Developed). In 2010, the Municipality of Anchorage determined that while the *original* Iditarod Trail was subject to a 100-foot easement, the original alignment followed the Crow Creek Road right-of-way and is not the current alignment of the trail. The Municipality determined that the existing alignment is subject to a 50-foot-wide easement (25 feet each side of centerline). The existing portion of the trail shown on the plat as "Existing Iditarod Trail" is not subject to any RS2477 provisions. See Attachment 4 for the determination letter, dated February 11, 2010.

The proposed plat would maintain the majority of the existing trail alignment in its current location and would realign a small segment of the trail, approximately 300 feet in length, to accommodate lot development in a portion of Lots 4 through 11.

Staff recommends a 25-foot trail easement on each side of the existing Iditarod Trail for a width of 50 feet in total, as shown along the eastern boundary of the subdivision for Lots 1 through 11. A recommended condition of the preliminary plat approval is for the petitioner to work with the Municipality, Girdwood Trails Committee, and Chugach National Forest staff, along with the affected users, to ensure the trail location within the provided easement is appropriate for the use and in alignment with the Girdwood Trails Plan (2024). The petitioner shall also coordinate with Girdwood Parks & Recreation on the type and location of trail signage.

Conformance with Adopted Plans

In addition to the stated Goals and Policies found in the Planned Unit Development Conditional Use staff report, this preliminary plat conforms with the petition site's land use classification and the elements of the comprehensive plan applicable to this area. The plat is consistent with Goals E.2. and E.3. in the *2025 Girdwood Comprehensive Plan*:

Goal E.2. Economic development in Girdwood is compatible with the natural environment.

The subdivision ensures adequate utilities and facilities while providing consideration of open space needs, protecting sensitive natural areas, such as wetlands, habitat, and riparian corridors.

Goal E.3.: Development that is sensitive to and enhances the natural environment.

The development of this subdivision is in keeping with the context of the surrounding environment. The layout preserves the valuable wetlands, provides access to open space tracts, and minimizes the amount of site disturbance for cut and fill for roads and site work with the associated variances.

Variance Requests

Variance 1: Requested Variance from 21.08.030L.1. *Lot Frontage and Access*

The petitioner is requesting a variance from AMC 21.08.030L.1., Lot Frontage and Access - *All lots shall have frontage on a street.*

Variance 2: Requested Variance from 21.08.040A *Dedication of Streets*

The petitioner is requesting a variance from AMC 21.08.040A.1., *Dedication of Streets- all street rights-of-way shall be dedicated to the public.* to avoid dedicating right-of-way west of proposed Holtan Hills Circle that would otherwise be a requirement (approximately 50' wide by 670' long).

Variance 3: Requested Variance from 21.08.030F.6.a *Cul-de-sacs*

The petitioner is requesting a variance from AMC 21.08.030F.6.a *Cul-de-sacs* to allow the Holtan hills Circle to exceed 600 feet in length. The proposed cul-de-sac length measured from the centerline of Holtan Hills Road to the center of the cul-de-sac bulb of Holtan Hills Circle is approximately 670 feet.

Discussion

Approval of Variances 1 and 2 would allow Holtan Hills Circle to remain a private road within access Tract 1B; the residential lots adjacent to Tract 1B would then front this private road instead of a public street. The homeowners association would be responsible for maintenance of the private roadway within Tract 1B.

Variance 3 is required, because while the proposed Planned Unit Development allows changes to density, lot size, uses, dimensional standards, and design standards, Chapter 8 *Subdivision Standards* are still applicable for cul-de-sac length.

Subdivision Variance Approval Criteria from AMC 21.03.240G.3.

The application must state with particularity the relief sought and must specify the facts or circumstances that are alleged to show that the application substantially meets the following standards. Those standards are assessed for each variance below:

- a. **There are special circumstances or conditions affecting the property such that the strict application of the provisions of the subdivision regulations would clearly be impractical, unreasonable, or undesirable to the general public.**

The standard is met for both variances 1 and 2.

There are special circumstances that strict application of the subdivision regulations would be undesirable to the general public. The steep slopes on portions of the property limit the location of structures and utilities. The location and design of the private road will minimize the site disturbance envelopes for structures and slope disturbance. The road will also manage drainage and avoid adverse drainage impacts by reducing the amount of cut and fill and re-contouring of the slopes for the road. The Traffic Engineering Department, Private Develop Department, and Right of Way Section support the requested variances.

The standard is met for variance 3 (cul-de-sac length).

There is no right-of-way connection available south of the property to the Girdwood Elementary School Subdivision. Connecting the proposed Holtan Hills Circle to Holtan Hills Road would require a grade greater than 20%. This would exceed the maximum grade allowed in the Design Criteria Manual (DCM) of 10%.

The topography and site constraints require the proposed cul-de-sac to take primary vehicle access from the northern end of the subdivision along Holtan Hills Road while routing the cul-de-sac along the western side of the property and south due to topography and the natural bench feature. There is no reasonable alternative to reduce the cul-de-sac length from 670 feet to 600 feet or less. Strict application of the subdivision regulations would be impractical and undesirable to the general public, as it would require massive grading and land disturbance to connect through. Shortening the cul-de-sac length would also result in fewer residential lots. The safest road design for development is the proposed design which requires the variance.

- b. **The granting of the specific variance will not be detrimental to the public welfare or injurious to other property in the area in which such property is situated.**

The standard is met for both variances 1 and 2.

Granting the variances will not be detrimental to the public or injurious to other property owners in the area. The homeowners association will privately maintain the road improvements. The private maintenance of the cul-de-sac is desired due to the topography of the street and control of efficient snow plowing and sanding for fast response times.

The standard is met for variance 3 (cul-de-sac length).

This variance would not adversely affect public welfare or negatively affect properties in the vicinity. There are no residences adjacent to the proposed subdivision, and this variance does not impact the school property. Granting approval of the variance will provide a road for the subdivision that both adequately serves the neighborhood and accommodates emergency response vehicles. This subdivision design appears to provide for safe vehicular and pedestrian circulation.

c. Such variance will not have the effect of nullifying the intent and purpose of the subdivision regulations or the comprehensive plan of the municipality.

The standard is met for both variances 1 and 2.

The proposed private road street design provides for compact development is necessary with steep slope and other environmental considerations. Maintenance of the private road will be to public standards through a homeowners association. It will not conflict with the orderly expansion of the public street system or emergency vehicle response. The intent of the subdivision regulations is met and the proposed subdivision will not have the effect of nullifying the applicable subdivision regulations. All lots within this subdivision will have access via the private road (Holtan Hills Circle). The variance request will reduce the disturbance envelop, including the amount of cut and fill for the reduced road right-of-way.

The standard is met for variance 3 (cul-de-sac length).

The intent of this section is to discourage cul-de-sacs that are excess in length for safety reasons to facilitate safe and effective access to the proposed lots. The proposed Holtan Hills Subdivision cul-de-sac exceeds the standard by 70 feet (or 11%), which appears to be the minimum additional length required to provide access and not create a loss of lots. This design appears to be a reasonable alternative due to topographical features and right-of-way constraints associated with the property.

The variance request is consistent with Goal E2 of the *Girdwood Comprehensive Plan – Economic Development in Girdwood is compatible with natural environment*. Approval of the variance will allow for a smaller road footprint serving the subdivision coupled with longer cul-de-sac construction with less disturbance to the bedrock slopes and a lesser likelihood of subsurface water disturbance.

d. Undue hardship would result from strict compliance with specific provisions or requirements of the subdivision regulations. The applicant may supplement the form with supporting documents.

The standard is met for both variances 1 and 2.

Undue hardship would result from strict compliance with the subdivision regulations. The property would be unfeasible to develop with strict compliance with the subdivision regulations. The topography of the property limits design options for access, road design, placement of homes, and utilities to a confined area of land. Granting the variances will enhance the maximum potential use of the property.

The standard is met for variance 3 (cul-de-sac length).

Undue hardship would result from strict compliance with the subdivision regulations. Denial of this variance would affect the property and strict compliance of the subdivision regulations would greatly increase the development footprint and site disturbance envelope for a secondary connection to Holtan Hills Road. Creating a shorter cul-de-sac would reduce the number of residential lots or create other variances to the subdivision for flag-lot length (AMC 21.08.030K.5.). The natural topography is too steep on the southeast end of the subdivision to connect to Holtan Hills Drive.

AMC 21.08.040 Streets Variance Standards Criteria

All street rights-of-way shall be dedicated to the public, unless there is approval of a variance. Applicants for a variance for private streets shall demonstrate the following:

a. Why a private street is appropriate and preferable to a publicly dedicated street;

The proposed subdivision and associated planned unit development is a creative use of a single tract of land to allow a housing density greater than otherwise allowed in the gR-3 district, resulting in more housing opportunities for the Girdwood community. The private street will include any easements for the necessary utilities. This lot design and private road layout appears to be a reasonable alternative that both adequately serves the neighborhood and accommodates emergency response vehicles. The granting of the variance allows for a private street to be built that will allow for a more compact development.

b. That a private party is willing and able to maintain a private street to public standards; and

It is a requirement for the developer to build the private road to a municipal standard. A homeowners association will maintain the private road. Staff has requested a condition of approval to provide a copy of the homeowners association documents and CC&R's to Planning prior to recording the final plat. The petitioner has stated in their application that they will form a homeowners association with the required dues structured to appropriately maintain the road.

c. That a private street presents no conflict or obstruction to the orderly expansion of the public street system.

The subdivision shown on the preliminary plat will provide access to the lots through a street design that provides a compact development, maintained to public standards through a homeowners association, and is designed as a cul-de-sac which will not conflict to the orderly expansion of the public street system.

Generally, reviewing agencies had either no comment or no objection to the variance requests. The Planning Department finds the standards are substantially met and recommends approval, subject to conditions.

DEPARTMENT RECOMMENDATION

- A. Approval of variances from AMC 21.08.030L.1., Lot Frontage and Access - *All lots shall have frontage on a street* and AMC 21.08.040A.1., Dedication of Streets - *all street rights-of-way shall be dedicated to the public*, subject to the following condition:
1. Recording a suitable plat within 60 months of approval and any approved time extensions.
- B. Approval of the request for a variance from AMC 21.08.030F.6.a *Cul-de-sacs* to exceed 600 feet in length for a cul-de-sac measuring approximately 670 feet from the centerline of Holtan Hills Road to the center of the cul-de-sac bulb in Holtan Hills Circle, subject to:
1. Recording a suitable plat within 60 months of preliminary approval and any approved time extensions.
- C. Approval of the phasing plan, subject to:
1. Recording a suitable plat within 60 months of approval and any approved time extensions.
- D. Approval of the plat for 60 months subject to the following conditions:
1. Resolve utility easements.
 2. Dedicate 60 feet of right-of-way for the proposed Holtan Hills Road and a 50-foot-radius temporary turnaround at the northeast end of Holtan Hills Road.
 3. Designate Tract 1B to include the two curves as shown with the minimum horizontal curve radius of 150 feet per Table 1-9 of the Design Criteria Manual (DCM). Horizontal curves less than 150-foot radius will require variance approval from the Municipal Engineer.
 4. Tract 1B is to be owned and maintained by the Homeowners Association (HOA).
 5. Designate Tract 1B as a private access tract comprised of a 50-foot-wide corridor for Holtan Hills Circle and a 50-foot-radius bulb for the cul-de-sac.
 6. Designate Tract 1A as open space tract (Area=86,431 SF).
 7. Establish a Homeowners Association (HOA) and provide a copy of the CC&R's to the Planning Department for review and approval.
 8. Resolve with Private Development the dedication of the trail easement for the Iditarod Trail for Lots 1 through 11. Lots 4 through 11 shall contain a minimum 25' easement along the east boundary of the lots to provide for the relocation of the trail in that area. The remainder of the trail shall be accommodated by an easement on Lots 1 through 3 and Tract 1A where required to ensure a minimum 25' of space is provided from the west edge of the existing trail.

9. Resolve with Private Development the need for and location of drainage easements. This is necessary to allow existing drainage patterns to cross the new property lines and to allow for future drainage improvements to connect to the best reasonable public storm drain system.
10. Resolve with Watershed Management Services for the following:
 - a. How will the project satisfy the stormwater treatment and extended detention requirements of Section 3? (i.e., Water Quality Treatment Sec. 3.3.2.1, Extended Detention Sec. 3.3.2.2, and Detention and Peak Flow Control Sec. 3.3.2.4 and 3.3.2.5).
 - b. If the application of Green Infrastructure for this project is deemed infeasible, please provide a Green Infrastructure Feasibility Form (DCM Ch.2 Appendix L) stating the constraining elements that prevent the use of or severely restrict the overall function and benefit of Green Infrastructure techniques (DCM Ch.2 Sec. 3.3.2.1).
11. Enter into a subdivision agreement with Private Development for the required public improvements, including the asphalt street, traffic control devices, street signs, monuments, drainage facilities, lighting, trail access, and utilities for the following:
 - a. Construct Holtan Hills Road to municipal standards in accordance with 21.09.070.F.5, Holtan Hills Road shall be constructed as a 20- to 22-foot-wide strip-paved road, with 3.5- to 5-foot shoulders, and ditches (or as otherwise approved to match the approach road (Holtan Hills Drive)) on both sides of the roadway.
 - b. Construct Holtan Hills Circle in accordance with 21.09.070.F.5, Holtan Hills Circle shall be constructed as a 20- to 22-foot-wide strip-paved road, with 3.5- to 5-foot shoulders, and ditches on both sides of the roadway with 39.5-foot radius cul-de-sac.
 - c. Provide a pedestrian path/bikeway on at least one side of Holtan Hills Road, in accordance with 21.09.070.F.5.d. (or as otherwise approved to match the approach road (Holtan Hills Drive)).
 - d. Provide street lighting in accordance with 21.09.070.G.
 - e. The relocation and construction of the existing Iditarod Trail on Lots 4-10, within the easement provided on the east boundary of the lots, as noted on the proposed plat. The Trail shall be located within the easement and constructed to the standards approved by Heritage Land Bank (HLB), the Girdwood Trails Committee, Girdwood Valley Service Area, U.S. Forest Service, and other affected stakeholders.
12. Enter into mainline extension agreements with Anchorage Water & Wastewater Utility (AWWU) to serve the proposed lots prior to recording the final plat to include:

- a. Sewer main extension. The sewer main constructed during the off-site development phase (Private Development Agreement S25-003) is entirely within the bounds of Girdwood Elementary School Tract A1A south of the proposed development site. This main does not front any other parcels.
 - b. Water and sewer easements may be required on the southeast side of Holtan Hills Drive. Confirm the water and sewer mains have 15-feet of easement and/or Right-of-Way protection on either side of main centerline. Proposed Tract 1A and Block 2 Lots 1 – 11 will need to be evaluated for additional easements. Please provide a draft to AWWU Planning after surveyance of the water line per proposed Note 3 on the draft plat. A 30-foot sewer easement will be a requirement in proposed Tract 1B, it shall be centered on the sewer main, this may impact Block 3 Lots 1-3, and Block 1 Lot 12.
 - c. *Advisory: Parcels with frontage on the proposed Holtan Hills Drive will be assessed in accordance with AWWU Tariff Rule 8.2.B.1 at the 2011 LUC rate of \$0.96122 per square foot on the area fronting Holtan Hills Drive up to 150 feet back. Parcels benefited by the proposed sanitary sewer main extension will be assessed for sewer trunk in accordance with ASU Tariff Rule 8.2.A.1 at the LID-GA60 rate of \$0.00599 per square foot on the total area of the parcel. No assessments will be triggered by this platting action.*
13. Place the following notes on the plat:
 - a. The property owner and utilities shall not raise, lower, or re-grade the property in a manner that will alter the drainage patterns from those shown on the approved grading and drainage plan without prior approval from Municipality of Anchorage Building Safety Office.
 - b. Property owners and utilities shall not obstruct, impede, or alter approved drainage facilities (e.g. swales, ditches) in any way that will adversely impact adjacent properties or rights of way.
 - c. The Municipality will not now and will not in the future accept the ownership of, or the maintenance of, or the responsibility for snow plowing or roadway improvements in Tract 1B. Ownership, maintenance, and snow clearing shall remain the collective responsibility of the property owners of the lots which receive their access off of this tract.
14. Make the following drafting change:
 - a. In the platted area:
 - i. Change street name type. The proposed street configuration for “Holtan Hills Road” is such that it would be better identified as “Holtan Hills Drive.”
 - ii. Change street name. The proposed street name of “Holtan Hills Circle” is not unique and will need its own new unique street name to differentiate it from “Holtan Hills Drive.”

15. Obtain approval of the conditional use for the Planned Unit Development in Case 2026-0005.

Reviewed by:



Mélisa R. K. Babb
Planning Director

Prepared by:



Shawn Odell
Senior Planner

S12827

APPENDIX A COMMENT RESPONSE TABLE

Public Comment on S12867	Response
<p>Sean R Marx 12/13/2025 5:20:21 PM</p> <p>I am writing as an Alaskan resident and Anchorage taxpayer to formally request denial of the proposed plat approval for the Holtan Hills development. This request is based on multiple procedural and legal deficiencies under Anchorage Municipal Code (AMC) Title 25 and related planning requirements, as outlined below: 1. Lack of Site-Specific Land-Use Study AMC §25.40.025(C) requires a site-specific land-use study when existing plans do not adequately evaluate the parcel. No such study was conducted prior to AO2023-137, leaving critical issues—such as infrastructure, environmental sensitivity, and community compatibility—unaddressed. 2. Procurement Violations and Partner Withdrawals The original RFP (2021P015) awarded the project to a team including CY Investments, Pomeroy Property Development, and Seth Andersen. By early 2024, Pomeroy and Andersen withdrew, materially altering the proposal. AMC §25.40.025(D) mandates competitive integrity in disposals; no re-bid or public re-approval occurred after these withdrawals. 3. Unsupported “Best Interest” Finding AMC §25.40.025(B) requires a documented finding that the disposal serves the municipality’s best interest. This finding was unsupported: • No site-specific study was completed. • Public testimony, including strong opposition and GBOS objections, was disregarded. The ordinance therefore lacks a factual basis and fails procedural standards. 4. Expired Master Plan Under AMC §21.09 (Girdwood Area Plan), GR-3 zoning requires a master plan. The Crow Creek Neighborhood Plan (2006) anticipated development by 2010 under a land-bank model, which never occurred. The plan has effectively expired and cannot authorize current platting. 5. Public Trust Breach and Irreparable Harm Article VIII of the Alaska Constitution requires maximum public benefit in land disposals. This transaction benefits a single private entity, resembling a “sweetheart deal.” Construction began in September 2025, clearing old-growth forest and filling ~6.8 acres of wetlands under USACE Permit POA-2021-00492. These impacts are irreversible and will moot any future</p>	<p>Case S12867 is a platting case and therefore must be reviewed according to 21.03.200C.9. Many of the items identified in this comment do not relate to this subdivision process.</p> <p>This case runs alongside PZC Case 2026-0005, a Planned Unit Development through a conditional use process, which provides the avenue to supersede the master-planning requirement of gR-3.</p>

Public Comment on S12867	Response
<p>judicial review. Requested Actions: 1. Deny plat approval for Holtan Hills. 2. Halt ongoing land disturbance until: • A site-specific land-use study is completed (§?25.40.025(C)), • A new competitive process addresses partner withdrawals (§?25.40.025(D)), • A documented “best interest” finding is provided (§?25.40.025(B)), • Environmental impacts are fully reviewed. 3. Preserve the status quo to prevent irreparable harm and allow neutral review. Conclusion: Approving this plat under current conditions violates municipal code, undermines public trust, and risks irreversible environmental and community harm. Denial is necessary to uphold the law and protect public lands for all Alaskans. Thank you for your attention to this matter. I respectfully request a written response. Sincerely, Sean R Marx, Alaskan Resident</p>	
<p>Sean Marx 12/13/2025 3:02:18 PM</p> <p>AO 137 original disposal ordinance is void for reason eluded to in no site-specific land use study, violation of procurement code and public notice claims blatantly ignored as many Alaskan citizens appeared and testified on-record against land disposal. Under Girdwood 21.09 E Area Master Planning Mandatory in GR-3 zoning district I surmise this is a bogus argument claiming the crow creek neighborhood use plan was adopted in 2006 and it had a development schedule that to build houses in 2010 (including plat approval) when land bank was going to be main developer. Abandonment of Master Plan. A and B. Expiration. You can't approve this plat due to one or all the claims eluded to in the following arguments. A response is demanded. I seek to deny plat approval and preserve the status quo by halting ongoing irreversible harm to public lands from the Holtan Hills development. Potential third party scrutiny, such as a court of proper jurisdiction will find the plat and disposal violates municipal procedures, and this plat approval and continued activity will destroy wetlands and old-growth forest before a neutral "third party" can potentially rule on the merits. Plat denial is requested to prevent irreparable environmental and community injury. Heritage Land Bank (HLB) issued RFP 2021P015</p>	<p>Case S12867 is a platting case and therefore must be reviewed according to 21.03.200C.9. The items identified in this comment do not relate to this subdivision process.</p>

Public Comment on S12867	Response
<p>on April 28, 2021; the selected proposal (June 2022) relied on a team including CY Investments, Seth Andersen, P.E., and Pomeroy Property Development. Pomeroy and Andersen withdrew by early 2024, materially altering the proposal without re-bid or re-approval. The Assembly approved the flawed disposal on January 23, 2024 via AO 2023-137. Notice was inadequate; no site-specific study conducted. The “best interest” finding was unsupported amid documented community opposition, including GBOS objections. Construction began September 2025, filling ~6.8 acres of wetlands and removing forest under USACE Permit POA-2021-00492. Further, neutral party review is requested for AMC Title 25 Violations because this land disposal and proposed platting lacks a site-specific study (AMC § 25.40.025(C)), undermined the competitive process by ignoring partner withdrawals (AMC § 25.40.025(D))— essentially “donating” this land to “one individual” for development— and features an arbitrary “best interest” finding under (AMC §§ 25.40.020, .025). Frustration of Purpose exists – party withdrawals altered the core proposal without re-approval, frustrating its purpose. There is a Public Trust Breach because the disposal and plat fails maximum public benefit (Art. VIII, Alaska Const.), again conveying the land to one “individual” in what many Alaskans have termed a “sweetheart deal,” serves to bolster procedural claims herein. Plat denial is probable given clear procedural lapses. Irreparable Harm Will Occur Absent third “neutral” party interventions because the ongoing clearing destroys wetlands and forest—irreparable environmental harm not compensable by money. Construction alters the status quo, moots claims before potential third party intervention. Community impacts (infrastructure strain, loss of public resources) are imminent and irreversible. Denying the plat preserves public lands for all Alaskans- not just for the financial gain of “one Alaskan” and I stand behind my analysis as a Alaskan resident and Anchorage taxpayer safeguarding municipal compliance by enforcing Alaskan plat and land disposal laws and claim that protecting this resource serves the public interest (Art. VIII, Alaska Const.).</p>	

Public Comment on S12867	Response
<p>Carl 12/12/2025 3:37:34 PM</p> <p>1. AMC 25.40 – HLB Land Disposal Requirements AMC 25.40 requires that municipal land disposals: * be competitively solicited, * achieve fair market value, * and clearly serve the Municipality’s best interest. The Agreement conveys large, valuable tracts of Girdwood land to CY Investments without a guaranteed purchase price, without evidence of competitive solicitation, and without demonstrating public benefit — all inconsistent with AMC 25.40’s requirements. 2. AMC 7.20 – Procurement Code CY Investments receives multiple forms of compensation that constitute professional and construction-management services, including: * 3.5% project-management fee, * 3% marketing fee, * 1% administrative fee, * reimbursement of internal costs and overhead. Normally, these services must be competitively procured under AMC 7.20. If no RFP or RFQ was issued, the Agreement may violate procurement law. 3. Failure to Achieve Fair Market Value A December 2021 Municipal appraisal valued the Holtan Hills land at \$2.1 million. Despite this, the Municipality conveyed the land with no upfront compensation and no public-interest justification for discounting the value. This raises significant concerns under AMC 25.40’s fair-market-value requirement. 4. Property Tax Undervaluation (AMC 12.05 – “Full and True Value”) The parcels deeded to CY Investments are assessed at approximately \$260,000 each, totaling less than the City’s own appraisal. This contradicts AMC 12.05’s mandate for uniform and true-value assessment and constitutes an ongoing tax subsidy to the developer. 5. Developer Is Insulated from Risk While Receiving Multiple Forms of Guaranteed Compensation This is one of the most troubling aspects of the Agreement. In standard development practice: * Developers fund entitlements, engineering, and infrastructure. * Developers repay themselves through lot sales. * Developers bear cost overruns and unforeseen conditions. * Developers earn profit after risk is taken. None of this applies here. Under the Agreement: * The Municipality pays for all off-site improvements, including overruns. * The Municipality bears all extraordinary costs, including landfill remediation. * CY Investments is reimbursed for internal project</p>	<p>Case S12867 is a platting case and therefore must be reviewed according to 21.03.200C.9. The items identified in this comment do not relate to this subdivision process.</p>

Public Comment on S12867	Response
<p>expenses. * CY Investments receives guaranteed fees (3.5%, 3%, 1%) regardless of project performance. * Off-site costs paid by the Municipality are not reimbursed from project revenue. * Because the public finances the infrastructure, CY's profit margin is artificially inflated — she earns more because taxpayers shoulder her usual costs. * No mechanism exists for the Municipality to recover its infrastructure expenditures, even though these expenditures directly increase the value of the lots CY will sell for profit. This structure exposes the Municipality to unlimited downside, while guaranteeing protected profit to a private developer. It is the opposite of prudent public-private partnership structuring and raises serious questions about compliance with: * AMC 25.40 (public-interest requirement) * Article VIII of the Alaska Constitution (maximum public benefit) * Basic fiduciary responsibility over public resources The economic structure of the Agreement cannot reasonably be construed as serving the public interest. 6. Alaska Constitution Article VIII – Maximum Benefit to the People Public resources must be managed for the maximum benefit of Alaska's people. The Agreement shifts risk to the public, guarantees private profit, and contains no affordability or workforce housing guarantees. This imbalance is inconsistent with constitutional obligations. 7. Conflict of Interest Concerns (AMC 1.15) The developer may benefit from: * management fees, * administrative fees, * marketing fees, * profit-sharing, * real estate commissions. Layered financial benefit from public assets raises conflict-of-interest issues. 8. Open Meetings Act Issues (AS 44.62.310) If negotiations or deliberations occurred outside properly noticed meetings, they may violate the Alaska Open Meetings Act. The Holtan Hills Agreement relies on a financial structure that protects the developer from loss, exaggerates private profit at public expense, undervalues public land, and fails to meet the legal, financial, and constitutional standards required for public land disposal. These issues justify immediate pause, full legal review, and potential revision.</p>	
<p>Brooks Chandler 12/9/2025 2:44:53 PM</p>	<p>This case runs alongside PZC Case 2026-0005, a Planned Unit Development through a conditional use process, which provides the</p>

Public Comment on S12867	Response
<p>The Platting Board/Planning Commission should postpone action on the plat application until an area master plan has been approved by the Anchorage Assembly. A valid and approved area master plan is required . “Prior to subdivision or development of any portion of” the GR-3 district. AMC 21.09.040(B)(2)(d)(iii)(A) . There was an area master plan approved in 2006, however that approval expired by operation of AMC 21.09.030(E)(7)(a): 7.Abandonment of area master plan. An area master plan approval shall expire if: a. Implementation of the area master plan schedule is delayed for more than seven years without a request for a schedule modification. The construction schedule in the Crow Creek Neighborhood Land Use Plan called for homes to be built beginning in 2007. CCNUP p.32. This schedule has been delayed for 18 years which is more than 7 years. It appears no request for a schedule modification was submitted or approved. Therefore the prior approval of the CCNLUP has expired. This means there is no existing area master plan. Platting must be delayed until a new area master plan has been approved. If the Board/Commission ignores municipal code the following changes/additions to the Plat should be made: Add a Plat Note to read: One of Lots 12 and 13, Block 1 has been designated for conveyance to a Girdwood housing trust or non-profit for the purposes of developing community housing for residents. See, AO 2023-037 Sec.1(D). Add a Plat Note to read: One of the following Lots has been designated for conveyance to a Girdwood housing trust or non-profit for the purposes of developing community housing for residents: a. Lots 1-11 , Block 1 b. Lots 1-19, Block 2 c. Lots 1-9, Block 3. See, AO 2023-037 Sec.1(D). Add a Plat Note to read: Any person seeking to develop lots must submit applications for land use entitlements to the Girdwood Board of Supervisors for review prior to seeking official action by the designated decision-making body. See, AO 2023-037 Sec. 1(C). Add a Plat Note to read: Use of lots for short term rentals is restricted. See AO 2023-037 Sec. 1(A). Comments on requested variances. Private Road-[Internal Tract B-Holtan Hills Circle] The variance should be denied. It appears all Lots in Phase 1 including the 2 multi-family lots (Lots 12 and 13</p>	<p>avenue to supersede the master-planning requirement of gR-3.</p> <p>AO 2023-037, referenced in this comment, does not relate to subdivisions or the Holtan Hills Project.</p> <p>The provisions of AO 2023-137, as passed by the assembly, govern regardless of any Title 21 process.</p> <p>These cases were submitted to the Girdwood Board of Supervisors as part of agency review, and the Girdwood Board of Supervisors provided comment via resolutions.</p> <p>Other comments have been noted.</p>

Public Comment on S12867	Response
<p>Block 1) would be expected to contribute to road maintenance of the proposed private driveway. ("The proposed road will be maintained by the Homeowner's Association"). This would make housing costs more expensive compared to spreading the costs of road maintenance over the entire service area. This makes granting the variance "injurious" to these lots and detrimental to the public welfare. Injury to the public welfare results from making houses/lots less affordable. The purported faster response time reflects ignorance of the existing sequence of snow removal in the Girdwood Valley Service Area (all of which is done by a private contractor NOT "the municipality") .</p> <p>Priority #1 is the road to the school and logic/efficiency will dictate the contractor move to Holtan Hills immediately after plowing the road to the school. I have no comment on whether a variance allowing a 50' public ROW is justified. Cul de Sac Length The applicant has referenced the wrong code provision. The site development rules for the gR-3 district state : "Street connection- b. Connectivity standards. i. Within contiguous residential and commercial developments, no local street may be developed longer than 450 feet, unless the street is connected to another street at each end. This means the degree of variance requested is 242 feet i.e. a 53% variance from the standard. Perhaps the variance remains justified.</p> <p>Girdwood has quite a few cul de sacs. But I assume there are health and safety reasons for the existing 450' standard. If the variance is granted a condition requiring connection with Crow Creek Road in the next development Phase as referenced in the application should be added. A condition requiring construction of a pedestrian walkway parallel to the proposed Holtan Hills Drive would mitigate pedestrian safety issues associated with an extra long cul de sac. Other Conditions Resubmittal of a proposed Iditarod Trail dedicated easement location should be required before a final plat is submitted for approval. Condition should make clear that trail relocation including trail construction and signage is an obligation of the applicant and must be completed and be acceptable to USFS and the Girdwood Trails Committee prior to final plat approval.</p>	

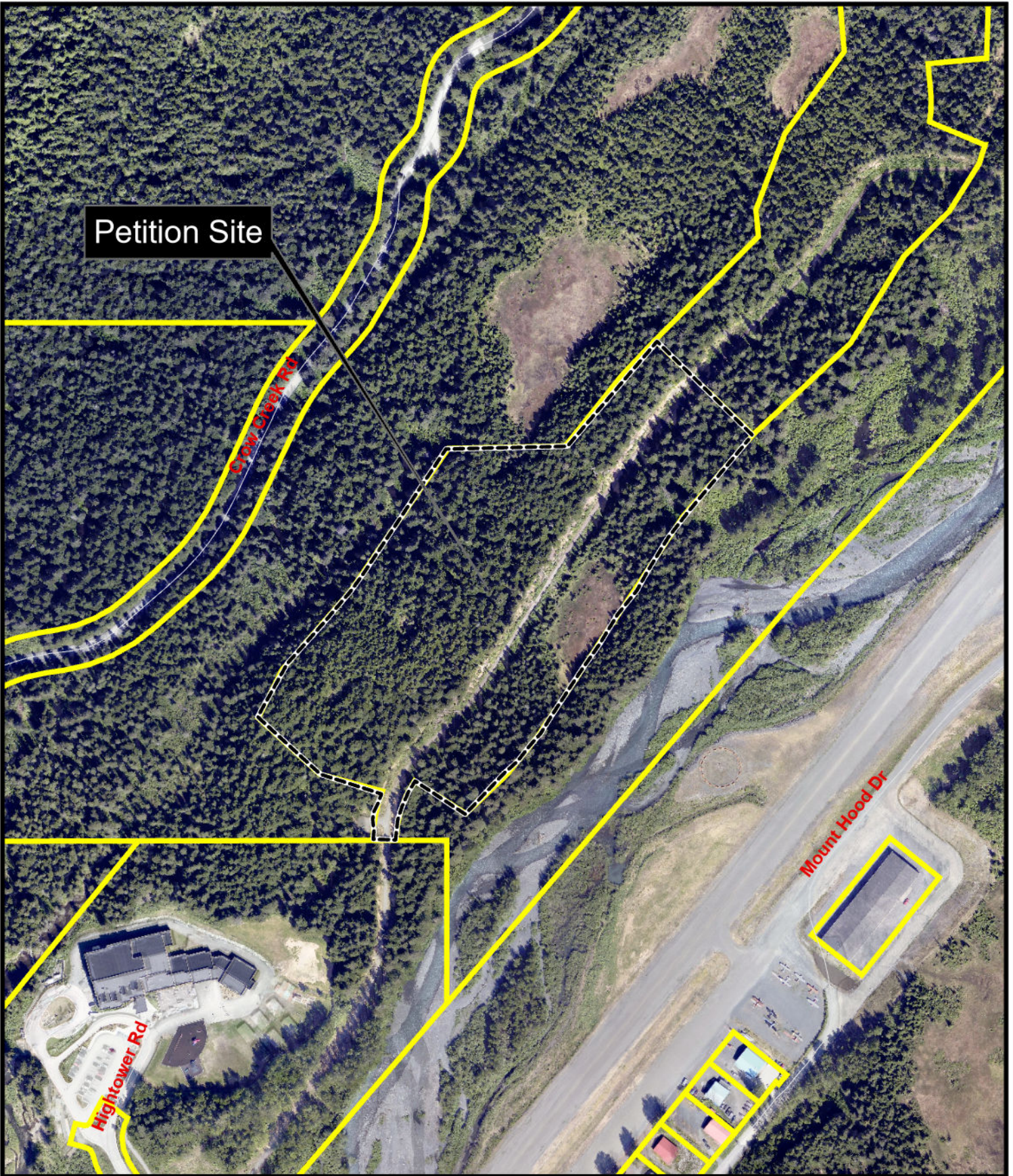
Public Comment on S12867	Response
<p>Kate 12/6/2025 12:06:29 PM</p> <p>This plat application does not include an easement for the National Historic Iditarod Trail that did travel through land that is now Phase 1 of Holtan Hills. The trail is of national significance. See the 1986 Iditarod Comprehensive Management Plan. This trail should be surveyed, and an easement recorded on the plat and paid for by the development partnership of CY and HLB. CY Investments was quite aware of the significance of the trail when they applied originally. Too, this trail will become the main walking trail for Holtan Hills residents who walk anywhere in Girdwood, and CY has heavily advertised Holtan Hills as a walking, outdoorsy subdivision. A condition for approval of this plat must include the realignment of the Girdwood Middle Iditarod National Historic Trail and a 50' easement (on either side of center line). This should be done in consultation with and approval of the Girdwood Trails Committee. This ensures that the national trail is protected, and the Girdwood Trails Committee--the people who live here--has had input in this realignment. It is critical that this trail be platted and approved for an easement now for the above reasons.</p>	<p>The application does include a 25' easement to the applicable side of the Iditarod trail. See NOTE #2 on the plat. New road infrastructure will also include walking infrastructure.</p>

Attachment 1.

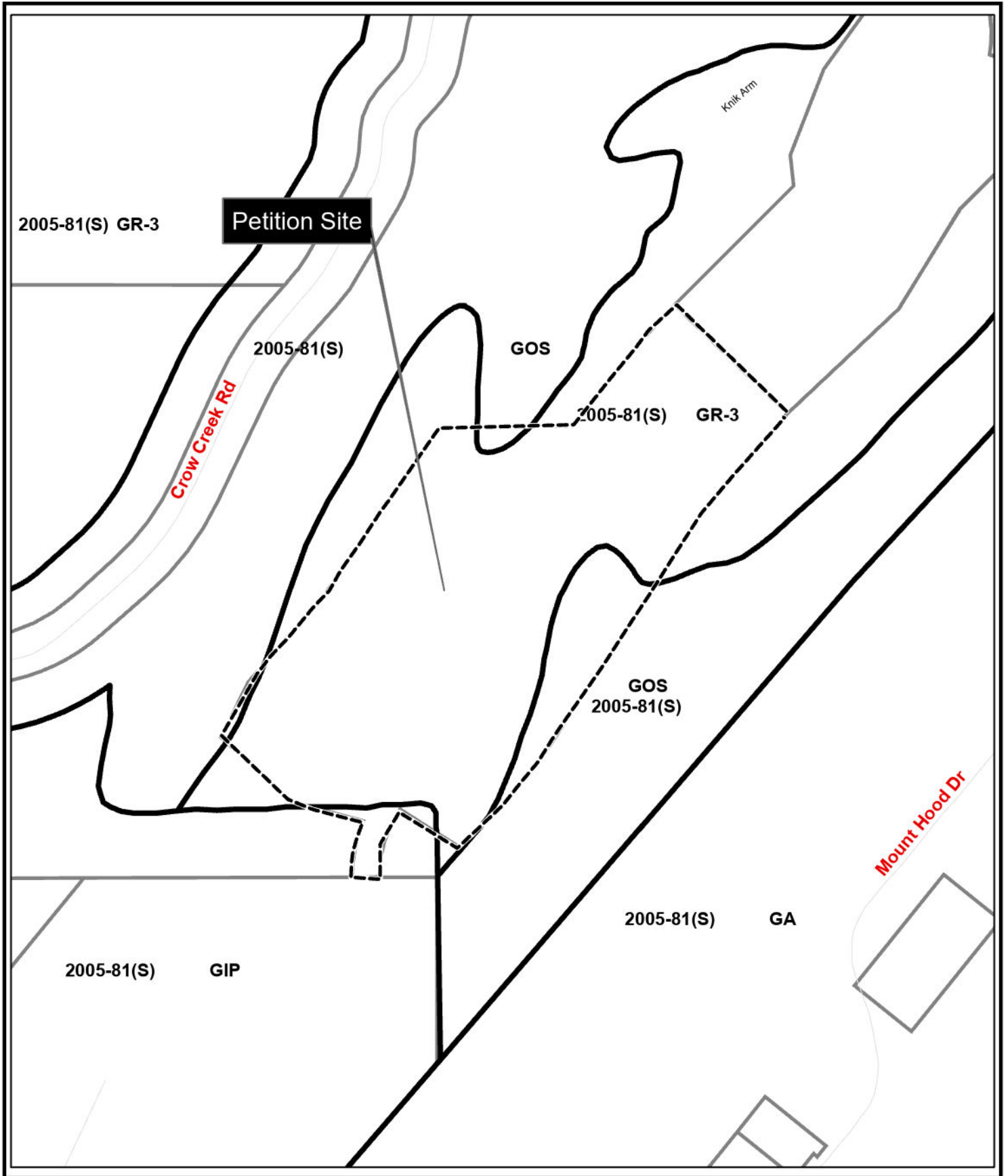
Parcel Boundary Maps

Case S12867

S12867



S12867



Attachment 2.

Application

Case S12867

Application for Preliminary Plat

Municipality of Anchorage
 Planning Department
 PO Box 196650
 Anchorage, AK 99519-6650



PETITIONER*		PETITIONER REPRESENTATIVE (IF ANY)	
Name (last name first) CY Investments LLC		Name (last name first) Hoffman, Tony (The Boutet Company)	
Mailing Address 561 East 36th Ave, Suite 200		Mailing Address 601 East 57th Place	
Anchorage, AK., 99503		Anchorage, AK. 99518	
Contact Phone – Day 907-646-3670	Evening	Contact Phone – Day	Evening
E-mail connie@bhhsalaska.com		E-mail thoffman@tbca.com	

*Report additional petitioners or disclose other co-owners on supplemental form. Failure to divulge other beneficial interest owners may delay processing of this application.

PROPERTY INFORMATION			
Property Tax # (000-000-00-000): 075-311-06-000			
Site Street Address: None Listed			
Current legal description: (use additional sheet if necessary) Tract 1, Holtan Hills Subdivision, Plat 2024-018			
Zoning: GR3	Acreage: 16.134	Underlying Plat #: 2024-18	Grid #: SE4517
# Lots: 0	# Tracts: 1	Total # parcels: 1	

PROPOSED SUBDIVISION INFORMATION		
Proposed legal description: (use additional sheet if necessary) LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B		
# Lots: 39	# Tracts: 2	Total # parcels: 41

I hereby certify that (I am)/(I have been authorized to act for) the owner of the property described above and that I petition to subdivide it in conformance with Title 21 of the Anchorage Municipal Code of Ordinances. I understand that payment of the application fee is nonrefundable and is to cover the costs associated with processing this application, and that it does not assure approval of the subdivision. I also understand that assigned hearing dates are tentative and may have to be postponed by Planning Department staff or the Platting Authority for administrative reasons.

Signature	<input type="radio"/> Owner <input checked="" type="radio"/> Representative (Representatives must provide written proof of authorization)	Date
Print Name		

S 1 2 8 6 7 JAN 0 5 2026

Accepted by: 	Poster & Affidavit (+)	Fee: \$12,240.00	Case Number: 512867	Meeting Date: PZC: 01/05/2026
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COMPREHENSIVE PLAN INFORMATION

Improvement Area (per AMC 21.08.050B.): Class A Class B

Anchorage 2040 Land Use Designation:

- Neighborhood (Residential) Center Corridor
 Open Space Facilities and Institutions Industrial Area

Anchorage 2040 Growth Supporting Features:

- Transit-supportive Development Greenway-supported Development
 Traditional Neighborhood Residential Mixed-use

Eagle River-Chugiak-Peters Creek Land Use Classification:

- Commercial Industrial Parks/opens space
 Public Land Institutions Marginal land Alpine/Slope Affected
 Special Study Residential at _____ dwelling units per acre

Girdwood- Turnagain Arm

- Commercial Industrial Parks/opens space
 Public Land Institutions Marginal land Alpine/Slope Affected
 Special Study Residential at 5 dwelling units per acre

ENVIRONMENTAL INFORMATION (All or portion of site affected)

- Wetland Classification: None "C" "B" "A"
 Avalanche Zone: None Blue Zone Red Zone
 Floodplain: None 100 year 500 year
 Seismic Zone (Harding/Lawson): "1" "2" "3" "4" "5"

RECENT REGULATORY INFORMATION (Events that have occurred in last 5 years for all or portion of site)

- Rezoning - Case Number:
 Preliminary Plat Final Plat - Case Number(s):
 Conditional Use - Case Number(s):
 Zoning variance - Case Number(s):
 Land Use Enforcement Action for
 Building or Land Use Permit for
 Wetland permit: Army Corps of Engineers Municipality of Anchorage

POTABLE WATER AND WASTE WATER DISPOSAL

- Potable Water provide by: Public utility Community well Private well
 Wastewater disposal method: Public utility Community system Private on-site

APPLICATION REQUIREMENTS

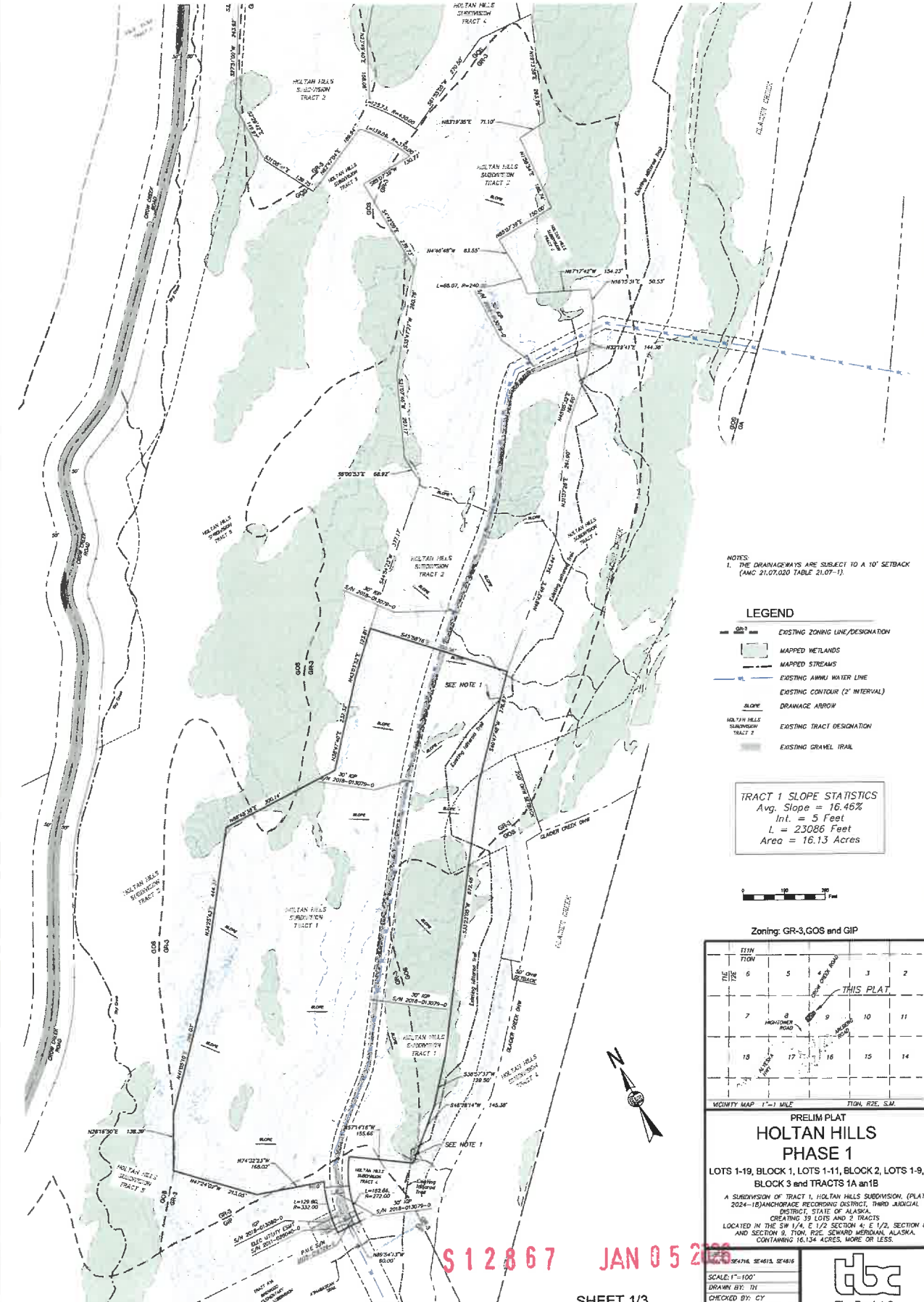
(One of each applicable item is required for initial submittal, additional copies are required after initial submittal)

- Signed application (original)
 Watershed sign off form, completed
 8½" by 11" reduced copy of plat
 Certificate to Plat
- 4 copies required: Subdivision drainage plan
- 9 copies required: Topographic map of platted area
- 14 copies required:
 (4 copies for a short plat)
 Signed application (copies)
 Preliminary plat
 As-built (if applicable)
 Summary of community meeting(s) (not required for short plat)

(Additional information may be required)

Additional required documents unless specifically waived by Platting Officer:

- Soils investigation and analysis reports (4 copies) Waived by _____



NOTES:
 1. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).

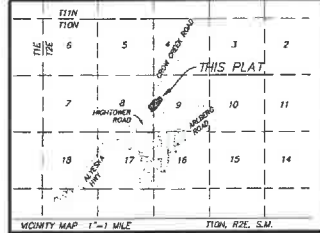
LEGEND

- EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- EXISTING AWWA WATER LINE
- EXISTING CONTOUR (2' INTERVAL)
- DRAINAGE ARROW
- EXISTING TRACT DESIGNATION
- EXISTING GRAVEL TRAIL

TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres



Zoning: GR-3, GOS and GP



PRELIM PLAT

HOLTAN HILLS PHASE 1

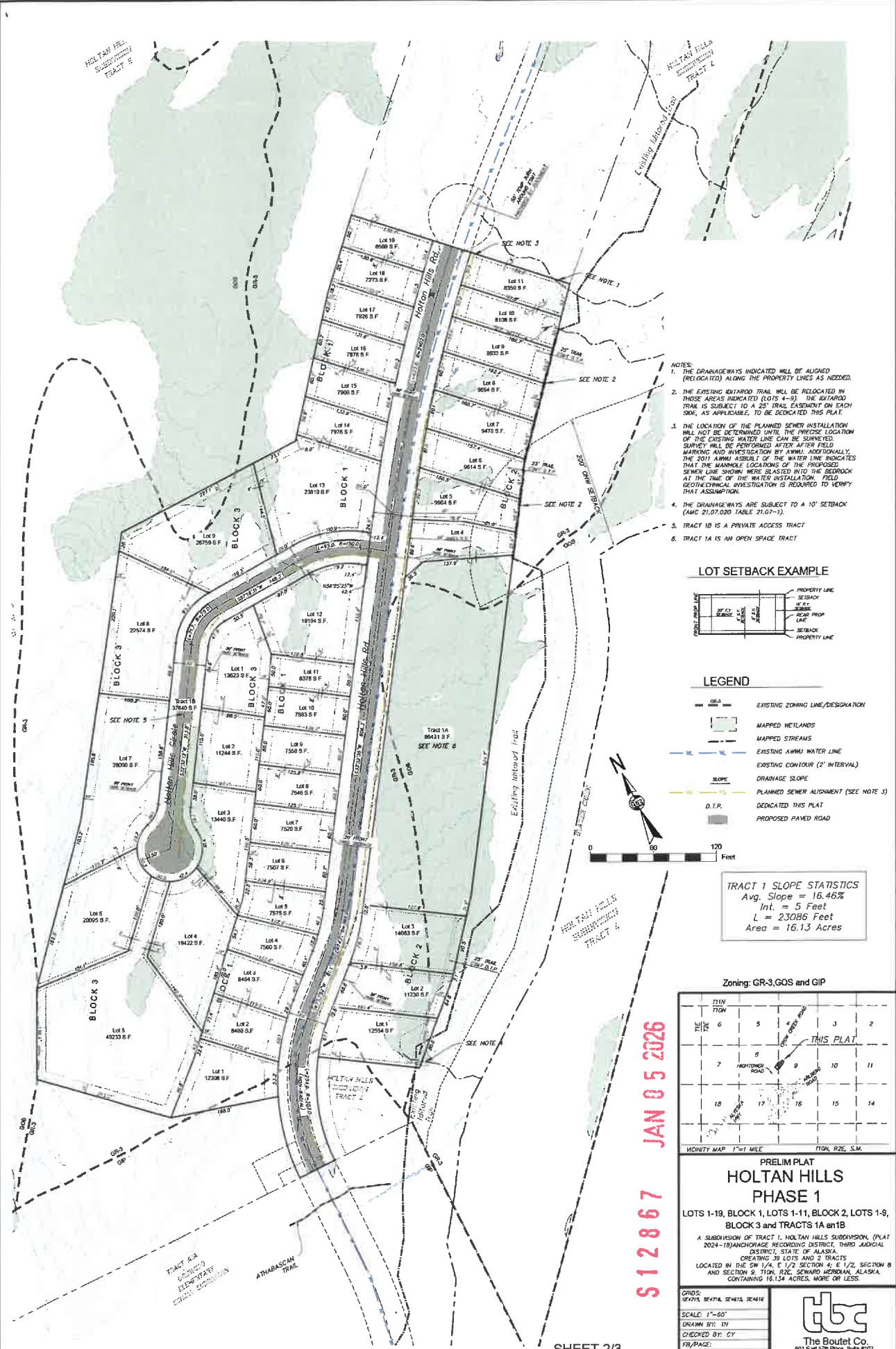
LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B

A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA, CREATING 39 LOTS AND 2 TRACTS LOCATED IN THE SW 1/4, E 1/2 SECTION 4, E 1/2 SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA, CONTAINING 16.134 ACRES, MORE OR LESS.

SCALE: 1"=100'
 DRAWN BY: TW
 CHECKED BY: CF
 15/PAGE:
 DATE: 10/22/25
 MCA CASE No.: N/A

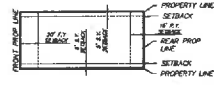


S 1 2 8 6 7 JAN 0 5 2 0 2 6



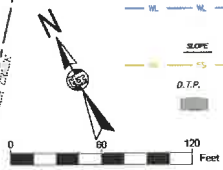
- NOTES:**
1. THE DRAINAGEWAYS INDICATED WILL BE ALIGNED (RELOCATED) ALONG THE PROPERTY LINES AS NEEDED.
 2. THE EXISTING IDIAROD TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-3). THE IDIAROD TRAIL IS SUBJECT TO A 2' TRAIL EASEMENT ON EACH SIDE, AS APPLICABLE, TO BE DEDICATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. SURVEY WILL BE PERFORMED AFTER AFTER FIELD MARKING AND INVESTIGATION BY ANNU. ADDITIONALLY, THE 2011 ANNU SURVEY OF THE WATER LINE INDICATES THAT THE MANHOLE LOCATIONS ON THE PROPOSED SEWER LINE SHOWN WERE BLASTED INTO THE BEDROCK AT THE TIME OF THE WATER INSTALLATION. FIELD GEOTECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
 4. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).
 5. TRACT 1B IS A PRIVATE ACCESS TRACT
 6. TRACT 1A IS AN OPEN SPACE TRACT

LOT SETBACK EXAMPLE



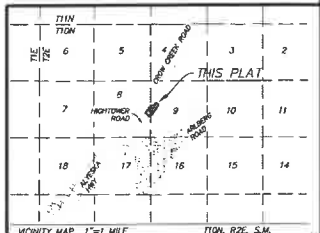
LEGEND

- EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- EXISTING ANNU WATER LINE
- EXISTING CONDUIT (2' INTERVAL)
- DRAINAGE SLOPE
- PLANNED SEWER ALIGNMENT (SEE NOTE 3)
- DEDICATED THIS PLAT
- PROPOSED PAVED ROAD



TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres

Zoning: GR-3, GOS and GIP



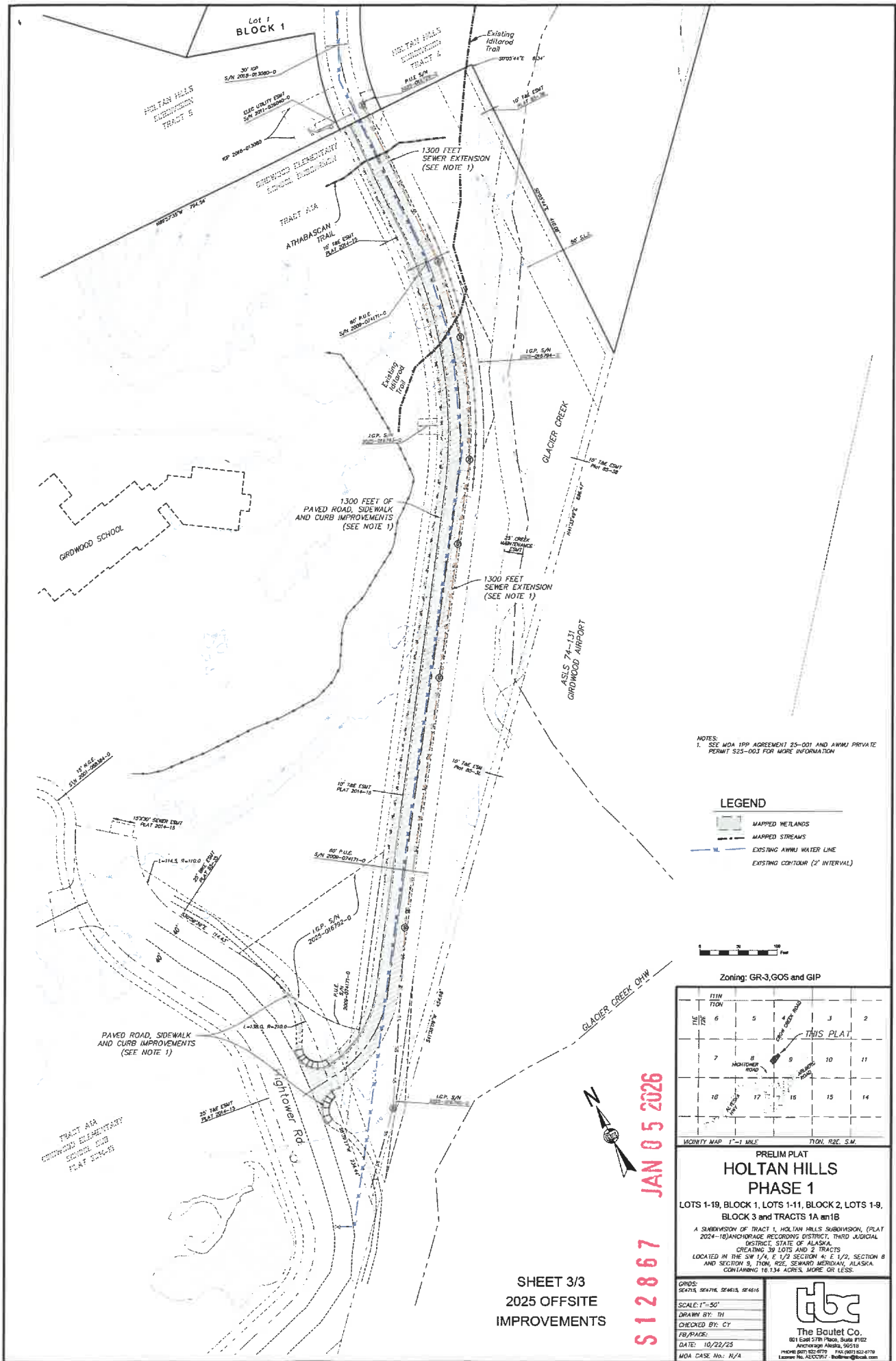
S 12867 JAN 05 2026

**PRELIM PLAT
 HOLTAN HILLS
 PHASE 1**

LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 8, E 1/2 SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA, CONTAINING 16.134 ACRES, MORE OR LESS.

GRID: SE475, SE476, SE478, SE479
 SCALE: 1"=60'
 DRAWN BY: TH
 CHECKED BY: CY
 FR/PAGE:
 DATE: 10/22/25
 MGA CASE No.: N/A





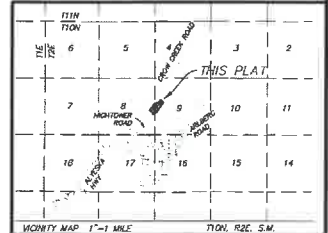
NOTES:
 1. SEE MDA IPP AGREEMENT 25-001 AND AWWA PRIVATE PERMIT 225-003 FOR MORE INFORMATION

LEGEND

- MAPPED WETLANDS
- MAPPED STREAMS
- EXISTING AWWA WATER LINE
- EXISTING CONTOUR (2' INTERVAL)



Zoning: GR-3, GOS and GIP

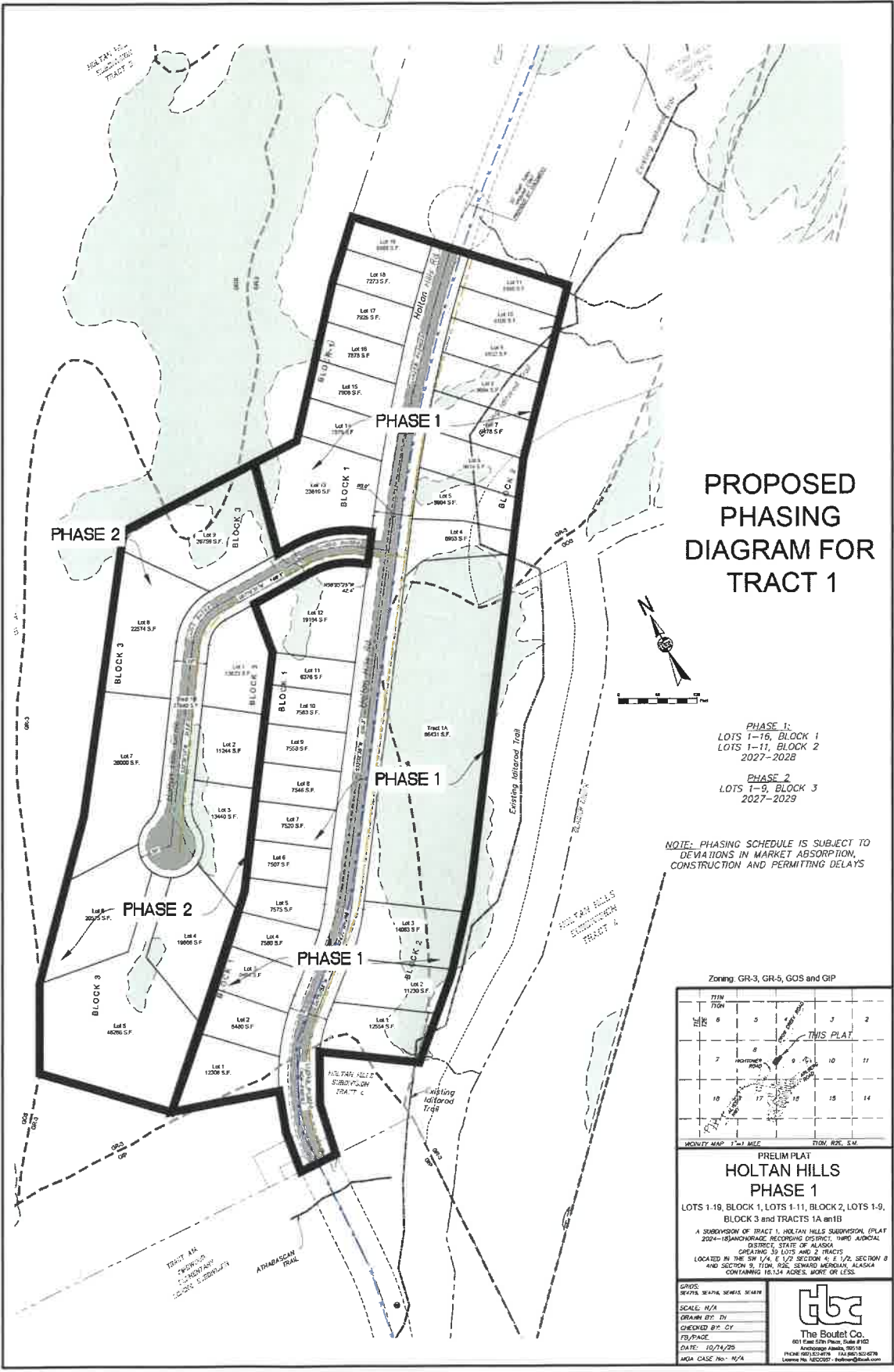


PRELIM PLAT
**HOLTAN HILLS
 PHASE 1**
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9,
 BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT
 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL
 DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4, E 1/2, SECTION 8
 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA.
 CONTAINING 16.134 ACRES, MORE OR LESS.

GRIDS:
 SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=50'
 DRAWN BY: TH
 CHECKED BY: CY
 DATE: 10/22/25
 MDA CASE No.: N/A

SHEET 3/3
 2025 OFFSITE
 IMPROVEMENTS

S 1 2 8 6 7 JAN 0 5 2 0 2 6



PROPOSED PHASING DIAGRAM FOR TRACT 1

PHASE 1:
 LOTS 1-16, BLOCK 1
 LOTS 1-11, BLOCK 2
 2027-2028

PHASE 2:
 LOTS 1-9, BLOCK 3
 2027-2029

NOTE: PHASING SCHEDULE IS SUBJECT TO DEVIATIONS IN MARKET ABSORPTION, CONSTRUCTION AND PERMITTING DELAYS

Zoning: GR-3, GR-5, GOS and GIP

T10N	1	2	3	4
T10N	5	6	7	8
T10N	9	10	11	12
T10N	13	14	15	16

THIS PLAT

WOLFEY MAP 1-11 MILE T10N R2E S4W

PRELIM PLAT
HOLTAN HILLS
PHASE 1
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and B

A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 6 & 1/2 SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA CONTAINING 16,124 ACRES, MORE OR LESS.

GR-3, GR-5, GOS, GIP, SEMI-DETACHED
 SCALE: 1/4" = 10'
 DRAWN BY: TH
 CHECKED BY: CJ
 FB/PAGE
 DATE: 10/24/25
 MGA CASE NO.: 19/4

The Boulet Co.
 601 East 5th Street, Suite #102
 Anchorage, Alaska, 99518
 Phone: (907) 547-4775 Fax: (907) 547-6778
 License No. A522957 - Professional Engineer

Application for Subdivision Variance

Municipality of Anchorage
 Planning Department
 PO Box 196650
 Anchorage, AK 99519-6650




PETITIONER*		PETITIONER REPRESENTATIVE (IF ANY)	
Name (last name first)	CY Investments, LLC	Name (last name first)	Hoffman, Tony (The Boutet COmpany)
Mailing Address	561 East 36th Avenue, Suite 200	Mailing Address	601 East 57th Place
	Anchorage, AK., 99503		Anchorage, Ak. 99518
Contact Phone – Day	907-646-3670	Contact Phone – Day	
Evening		Evening	
E-mail	connie@bhhsalaska.com	E-mail	thoffman@tbcak.com

*Report additional petitioners or disclose other co-owners on supplemental form. Failure to divulge other beneficial interest owners may delay processing of this application.

PROPERTY INFORMATION
Property Tax # (000-000-00-000): 075-311-06-000
Site Street Address: None listed
Current legal description: (use additional sheet if necessary) Tract 1, Holtan Hills Subdivision, Plat 2024-018

REQUEST
The variance is for relief from the requirement to: Lot Frontage to a Dedicated Street and Dedication of ROW
Associated platting case number (if applicable):

I hereby certify that (I am)(I have been authorized to act for) owner of the property described above and that I am petitioning for an subdivision variance in conformance with Title 21 of the Anchorage Municipal Code of Ordinances. I understand that payment of the application fee is nonrefundable and is to cover the costs associated with processing this application, and that it does not assure approval of the variance. I understand that the burden of evidence to show compliance with the variance standards rests with me, the applicant.

Signature  Owner Representative (Representatives must provide written proof of authorization) Date 10/24/25

Print Name Tony Hoffman

Accepted by: 	Poster & Affidavit: 1+1	Fee:	Case Number: S 1 2 8 6 7	Meeting Date: JAN 0 5 2026
			512867	Pzc: 01/05/2026

VARIANCE(S) REQUESTED FROM (CODE CITATIONS):

AMC 21. 21.08.030 L.1

AMC 21. 21.08.040 A.1

APPLICATION REQUIREMENTS

(One of each applicable item is required for initial submittal, additional copies are required after initial submittal)

If associated with a preliminary plat application: Signed application(original) and Signed application (16 copies)

If not associated with a preliminary plat application:

1 copy required: Signed application(original)

- 14 copies required:
- Signed application (copies)
 - Variance narrative, addressing:
 - The need for the variance
 - The effect of granting the variance
 - An analysis of how the proposal meets the variance standards below
 - Underlying plat
 - Proposed plot plan or site plan, to scale (new construction)
 - Topographic map of site
 - Photographs

(Additional information may be required.)

VARIANCE STANDARDS

The Platting Board may only grant a variance if the Board finds that **all** of the following 4 standards are substantially satisfied. Each standard must have a response in as much detail as it takes to explain how your property's condition satisfies the standard. The burden of proof rests with you.

- a. There are special circumstances or conditions affecting the property such that the strict application of the provisions of the subdivision regulations would clearly be impractical, unreasonable, or undesirable to the general public;
- b. The granting of the specific variance will not be detrimental to the public welfare or injurious to other property in the area in which such property is situated;
- c. Such variance will not have the effect of nullifying the intent and purpose of the subdivision regulations or the comprehensive plan of the municipality; and
- d. Undue hardship would result from strict compliance with specific provisions or requirements of the subdivision regulations. The applicant may supplement the form with supporting documents.



10/23/2025

Holtan Hills Subdivision
SUBDIVISION DESIGN VARIANCE NARRATIVE
LOT FRONTAGE AND ACCESS AND ROAD DEDICATION
(A.M.C. 21.08.030L.1 and A.M.C. 21.08.040A.1)

Project Location, Proposal and Background

The Holtan Hills Development is located in Girdwood, north of Hightower Road near the Girdwood Elementary School. The legal description for the development is Tract 1, Holtan Hills Subdivision, plat 2024-18. The area of the Tract is 16.134 acres. The project will create 39 lots, with 2 tracts. This request is specific to the cul-de-sac road (Holtan Hills Circle) serving the upper 9 lots in Block 3. The road corridor is planned to be a 50' wide private tract, built to applicable road standards.

Anchorage Municipal Code AMC 21.08.030L.1 states that *“Except when platted under subsection 21.03.200E., Commercial Tract Plats, or except for lots tracted out for open space, well protection areas, or for undevelopable areas such as wetlands, all lots shall have frontage on a street..”*

Additionally, Anchorage Municipal Code AMC 21.08.040A.1 states that “All street rights-of-way shall be dedicated to the public, unless a variance for private streets is approved by the platting board....”

We are requesting that the upper cul-de-sac road (Holtan Hills Circle) fronting and providing access to these lots in Block 3 be encompassed in a 50' private access tract in lieu of public right-of-way.

Variance Standards (AMC 21.03.240G.3.)

- a. *There are special circumstances or conditions affecting the property such that the strict application of the provisions of the subdivision regulations would clearly be impractical, unreasonable, or undesirable to the general public;***

The application of this requirement is both impractical and unreasonable in that it does not allow fullest and best use of the property. The proposed road will be maintained by the Homeowners Association. Dedication to and maintenance by the Municipality is clearly not as desirable as private maintenance and upkeep. In an area with high snow accumulation such as Girdwood, faster response times for plowing and sanding increases safety for the property owners within the cul de sac. Additionally, there is no possible way that the road can be extended south further, as private property and the Girdwood School are located directly to the south.

S 1 2 8 6 7 JAN 0 5 2026

- b. The granting of the specific variance will not be detrimental to the public welfare or injurious to other property in the area in which such property is situated;**

The requested variance does not affect any other properties adjacent to the proposed subdivision. Since the road and roadway improvements will be privately maintained by the homeowners association there is a cost benefit to the public. The private road will be constructed to all applicable municipal standards.

- c. Such variance will not have the effect of nullifying the intent and purpose of the subdivision regulations or the comprehensive plan of the municipality; and**

The requested variance does not negate any other subdivision standard, and in fact enhances the maximum use of the property. Approval of the variance will allow the development to proceed in a smaller footprint, thereby creating less disturbance to the property, and decrease the likelihood of subsurface water disturbance.

- d. Undue hardship would result from strict compliance with specific provisions or requirements of the subdivision regulations.**

Strict compliance with this requirement would create undue hardship, since it would preclude effective, responsible development of the property. A full ROW width of 60 feet would create greater disturbance as it would widen the road footprint and require buildings to be built back further. This results in more clearing and greater land disturbance to the existing vegetation along the road corridor which is highly undesirable to the future property owners as well as the Girdwood community.

Additional Variance Requirements (AMC 21.08.040A.1)

Anchorage Municipal Code AMC 21.080.040A.1 states that “All street rights-of-way shall be dedicated to the public, unless a variance for private streets is approved by the platting board. Applicants for a variance for private streets shall demonstrate the following:”

- a. Why a private street is appropriate and preferable to a publicly dedicated street.**

Allowing the street to be constructed in a private tract is preferable in that it allows for a more “compact” development, since it has a narrower ROW and the building setback is not so deep from the edge of road (compared to a full 60 foot ROW). Additionally, road grades are anticipated to potentially exceed 10%. Private contractors maintaining the road typically respond faster for snow plowing. This results in safer roads that have been plowed and/or sanded faster after snowfall when compared to municipally maintained roads. Lastly, the Municipality will not be required to maintain the road, thus a saving in cost and manpower to the city.

- b. That a private party is willing and able to maintain a private street to public standard.**

The developer will be required to build the road to municipal standard and form a binding homeowners association that will have the required dues structured to appropriately maintain the road.

- c. That a private street presents no conflict or obstruction to the orderly expansion of the public street system.**

The proposed road will be a cul-de-sac that terminates within the development and provides no possibility of extending further south due to significant topographic challenges.

Application for Subdivision Variance

Municipality of Anchorage
 Planning Department
 PO Box 196650
 Anchorage, AK 99519-6650




PETITIONER*		PETITIONER REPRESENTATIVE (IF ANY)	
Name (last name first) CY Investments, LLC		Name (last name first) Hoffman, Tony (The Boutet Company)	
Mailing Address 561 East 36th Avenue, Suite 200		Mailing Address 601 East 57th Place	
Anchorage, AK., 99503		Anchorage, Ak. 99518	
Contact Phone – Day	Evening	Contact Phone – Day	Evening
907-646-3670			
E-mail connie@bhhsalaska.com		E-mail thoffman@tbcak.com	

*Report additional petitioners or disclose other co-owners on supplemental form. Failure to divulge other beneficial interest owners may delay processing of this application.

PROPERTY INFORMATION
Property Tax # (000-000-00-000): 075-311-06-000
Site Street Address: None listed
Current legal description: (use additional sheet if necessary) Tract 1, Holtan Hills Subdivision, Plat 2024-018

REQUEST
The variance is for relief from the requirement to: AMC 21.08.030 F.6 (Cul De Sac Length)
Associated platting case number (if applicable):

I hereby certify that (I am)(I have been authorized to act for) owner of the property described above and that I am petitioning for an subdivision variance in conformance with Title 21 of the Anchorage Municipal Code of Ordinances. I understand that payment of the application fee is nonrefundable and is to cover the costs associated with processing this application, and that it does not assure approval of the variance. I understand that the burden of evidence to show compliance with the variance standards rests with me, the applicant.

Signature 	<input type="radio"/> Owner <input checked="" type="radio"/> Representative <small>(Representatives must provide written proof of authorization)</small>	Date 10/24/25
Print Name Tony Hoffman		

S 1 2 8 6 7 JAN 0 5 2026

Accepted by: 	Poster & Affidavit: 1+1	Fee:	Case Number: S 12867	Meeting Date: Pzc: 01/05/2026
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VARIANCE(S) REQUESTED FROM (CODE CITATIONS):

AMC 21.08.030 F. 6 CUL DE SAC LENGTH

AMC 21.

APPLICATION REQUIREMENTS

(One of each applicable item is required for initial submittal, additional copies are required after initial submittal)

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VARIANCE STANDARDS

The Platting Board may only grant a variance if the Board finds that **all** of the following 4 standards are substantially satisfied. Each standard must have a response in as much detail as it takes to explain how your property's condition satisfies the standard. The burden of proof rests with you.

- a. There are special circumstances or conditions affecting the property such that the strict application of the provisions of the subdivision regulations would clearly be impractical, unreasonable, or undesirable to the general public;
- b. The granting of the specific variance will not be detrimental to the public welfare or injurious to other property in the area in which such property is situated;
- c. Such variance will not have the effect of nullifying the intent and purpose of the subdivision regulations or the comprehensive plan of the municipality; and
- d. Undue hardship would result from strict compliance with specific provisions or requirements of the subdivision regulations. The applicant may supplement the form with supporting documents.



10/24/2025

Holtan Hills Subdivision
SUBDIVISION DESIGN VARIANCE NARRATIVE
CUL DE SAC LENGTH

Project Location, Proposal and Background

The Holtan Hills Development is located in Girdwood, north of Hightower Road near the Girdwood Elementary School. The legal description for the development is Tract 1, Holtan Hills Subdivision, plat 2024-18. The area of the Tract is 16.134 acres. The project will create 39 lots, with 2 tracts. The main road (Holtan Hills Drive) is 1440 feet and will be extended in future phases. This variance addresses the upper cul-de-sac road (Holtan Hills Circle), which is 670 feet.

Anchorage Municipal Code 21.08.030.F.6 states that "Where topography and traffic circulation permit, the length of a cul-de-sac right-of-way shall not exceed 900 feet in the R-6, R-8, R-9, R-10... and 600 feet in all other zoning districts...".

We are requesting a variance to allow a cul-de-sac length to exceed the standard by 70 feet for a total length of 670 feet.

Variance Standards (AMC 21.03.240G.3.)

- a. There are special circumstances or conditions affecting the property such that the strict application of the provisions of the subdivision regulations would clearly be impractical, unreasonable, or undesirable to the general public;***

The topography in the upper area of this development is very steep. The planned cul-de-sac road is situated on a ridge, and slopes exceeding 20% to the east and west (toward Crow Creek Road) away from the road corridor making any sort of secondary access or road connections prohibitive without massive grading and land disturbance. Strict application of this provision would result in fewer residential lots being provided in its current configuration due to the resulting shorter road length. Given the loss of residential opportunity, the strict application of this requirement is both impractical and unreasonable in that it does not allow fullest and best use of the property.

- b. The granting of the specific variance will not be detrimental to the public welfare or injurious to other property in the area in which such property is situated;***

The requested variance does not affect any other properties adjacent to the proposed subdivision. There are no residences adjacent to the development, and the school property is not impacted by the variance. All other required design standards for the cul-de-sac will be met upon construction.

S 1 2 8 6 7 JAN 0 5 2026

c. Such variance will not have the effect of nullifying the intent and purpose of the subdivision regulations or the comprehensive plan of the municipality; and

The requested variance does not negate any other subdivision standard, and in fact enhances the maximum use of the property. This variance request is consistent with or supported by the following goal of the Girdwood Comprehensive Plan:

Goal E2: *Economic development in Girdwood is compatible with the natural environment*

This variance will allow a smaller footprint of the road construction required. Allowing a slightly longer cul de sac to be built without a secondary access or connection means less disturbance of the bedrock slopes.

The requested variance will create less disturbance to the property and decrease the likelihood of subsurface water disturbance.

d. Undue hardship would result from strict compliance with specific provisions or requirements of the subdivision regulations.

Strict compliance with this requirement would create undue hardship, since it would preclude effective, responsible development of the property by increasing the development footprint necessary to provide a secondary access or by reducing the number of residential lots that are provided.

WMS WATERCOURSE MAPPING SUMMARY

Per the requirements for watercourse verification outlined in Project Management and Engineering Operating Policy and Procedure #8 and Planning Department Operating Policy and Procedure #1 (effective June 18, 2007), MOA Watershed Management Services has inspected the following location for the presence or absence of stream channels or other watercourses, as defined in Anchorage Municipal Code (21.35).

- Project Case Number or Subdivision Name: Holtan Hills Subdivision
- Project Location, Tax ID, or Legal Description: Tract 1 (parcel #07531106000)

- Project Area (if different from the entire parcel or subdivision): _____

In accordance with the requirements and methods identified, WMS verifies that this parcel, project area, or application:

_____ **DOES NOT** contain stream channels and/or drainageways, as identified in WMS field or archival mapping information.*

X ABC **DOES** contain stream channels and/or drainageways **AND** these are located and identified on submittal documents in general congruence with WMS field and archival mapping information.
*New or additional mapping **IS NOT REQUIRED**.**

_____ Contains stream channels and/or drainageways **BUT** one or more streams or other watercourses:

- are **NOT** shown on submittal documents, or
- are **NOT** depicted adequately on submittal documents for verification, or
- are **NOT** located or identified on submittal documents in general congruence with WMS field and archival mapping information.

*New or additional mapping **IS REQUIRED** and must be re-submitted for further review and verification.**

_____ Presence of stream channels and/or drainageways is unknown **AND** field verification is not possible at this time. WMS will verify as soon as conditions and prioritized resources allow.

* *Streams omitted in error by WMS or others remain subject to MOA Code and must be shown in new mapping upon identification of the error.*

ADDITIONAL INFORMATION:

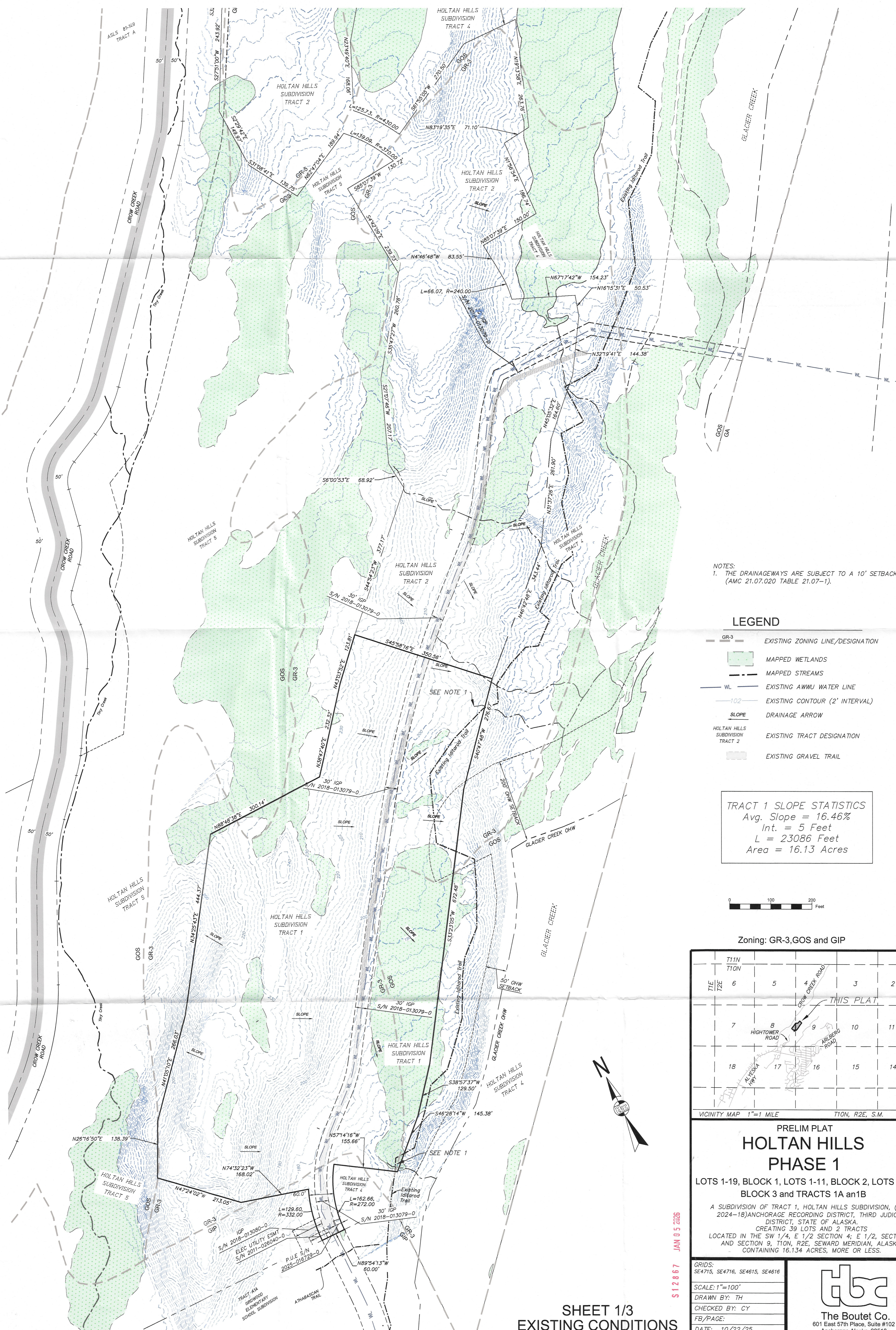
- | | | | | |
|----------------------------|---------------------------------------|--|--------------------------------------|--------------------------------|
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | WMS written drainage recommendations are available. | <input type="checkbox"/> Preliminary | <input type="checkbox"/> Final |
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | WMS written field inspection report or map is available. | <input type="checkbox"/> Preliminary | <input type="checkbox"/> Final |
| <input type="checkbox"/> Y | <input checked="" type="checkbox"/> N | Field flagging and/or map-grade GPS data is available. | | |

Inspection Certified By:

Date:



10/30/25

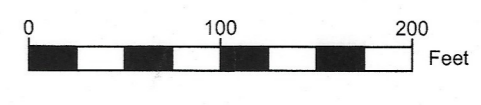


NOTES:
 1. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).

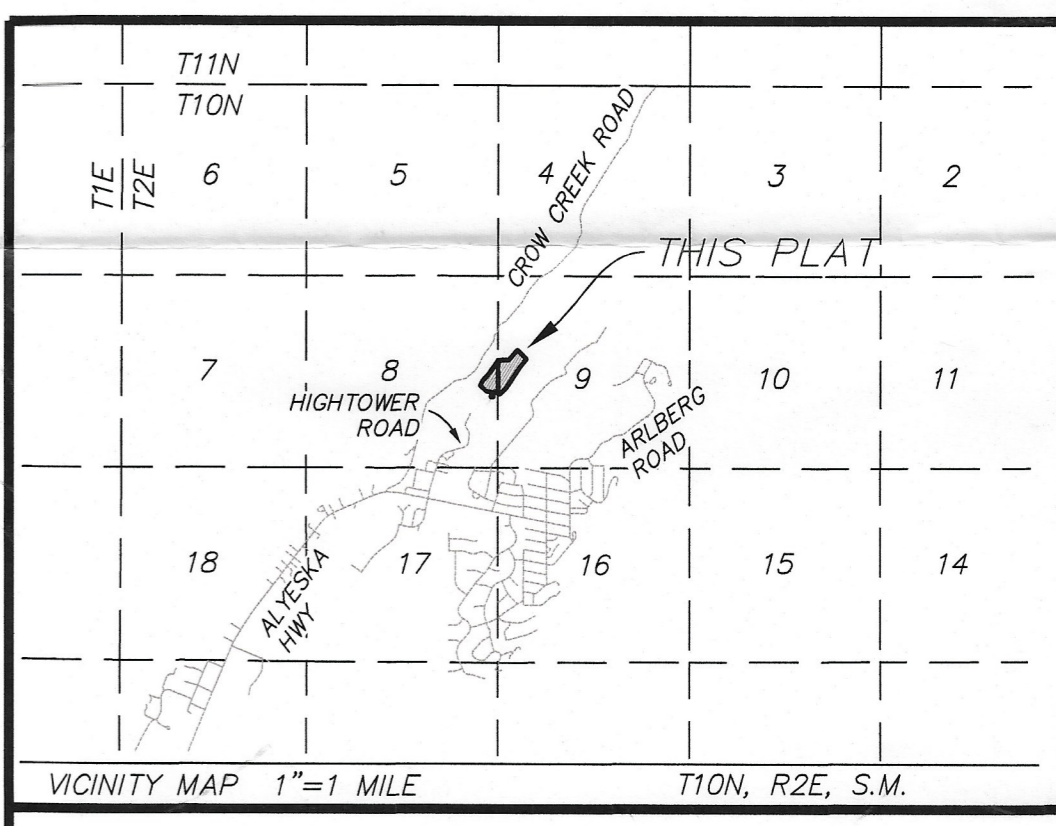
LEGEND

- GR-3 EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- WL EXISTING ANWU WATER LINE
- 102 EXISTING CONTOUR (2' INTERVAL)
- SLOPE DRAINAGE ARROW
- HOLTAN HILLS SUBDIVISION TRACT 2 EXISTING TRACT DESIGNATION
- EXISTING GRAVEL TRAIL

TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres



Zoning: GR-3, GOS and GIP



PRELIM PLAT
HOLTAN HILLS PHASE 1
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4; E 1/2, SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA. CONTAINING 16.134 ACRES, MORE OR LESS.

GRIDS: SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=100'
 DRAWN BY: TH
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MOA CASE No.: N/A

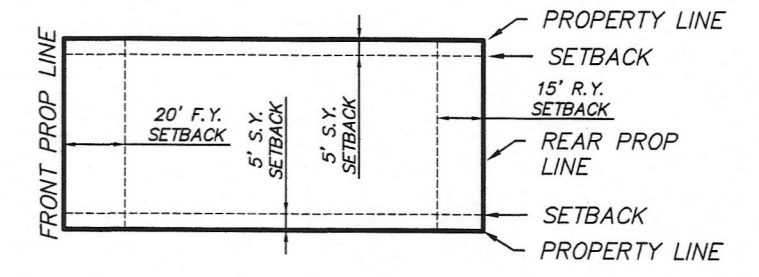
The Boutet Co.
 601 East 57th Place, Suite #102
 Anchorage Alaska, 99518
 PHONE (907) 522-8776 FAX (907) 522-8779
 License No. AEC0557 - thefman@tbcak.com

512867 JAN 05 2026

HOLTAN HILLS SUBDIVISION TRACT 5

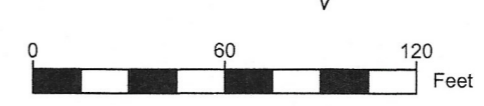
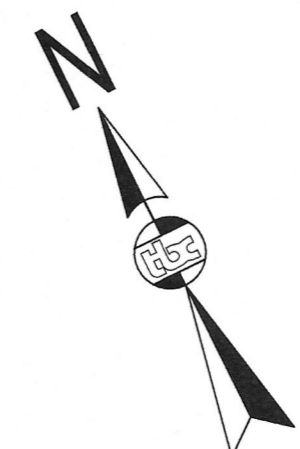
- NOTES:
1. THE DRAINAGEWAYS INDICATED WILL BE ALIGNED (RELOCATED) ALONG THE PROPERTY LINES AS NEEDED.
 2. THE EXISTING IDITAROD TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-9). THE IDITAROD TRAIL IS SUBJECT TO A 25' TRAIL EASEMENT ON EACH SIDE, AS APPLICABLE, TO BE DEDICATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. SURVEY WILL BE PERFORMED AFTER FIELD MARKING AND INVESTIGATION BY AWWU. ADDITIONALLY, THE 2011 AWWU ASBUILT OF THE WATER LINE INDICATES THAT THE MANHOLE LOCATIONS OF THE PROPOSED SEWER LINE SHOWN WERE BLASTED INTO THE BEDROCK AT THE TIME OF THE WATER INSTALLATION. FIELD GEOTECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
 4. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).
 5. TRACT 1B IS A PRIVATE ACCESS TRACT
 6. TRACT 1A IS AN OPEN SPACE TRACT

LOT SETBACK EXAMPLE



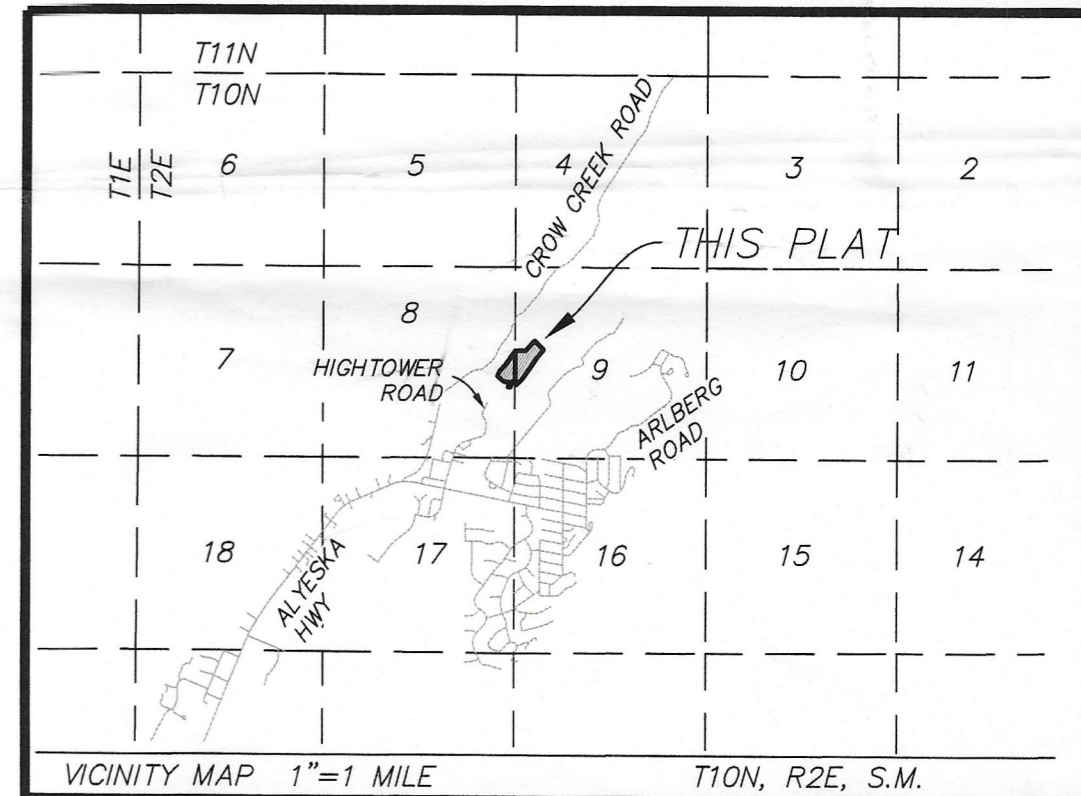
LEGEND

- GR-3 EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- WL EXISTING AWWU WATER LINE
- 102 EXISTING CONTOUR (2' INTERVAL)
- SLOPE DRAINAGE SLOPE
- SS PLANNED SEWER ALIGNMENT (SEE NOTE 3)
- D.T.P. DEDICATED THIS PLAT
- PROPOSED PAVED ROAD



TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres

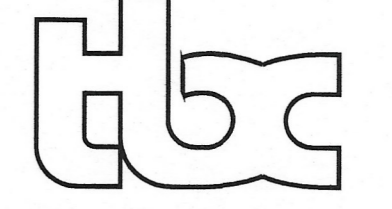
Zoning: GR-3,GOS and GIP



PRELIM PLAT
**HOLTAN HILLS
 PHASE 1**

LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4; E 1/2, SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA. CONTAINING 16.134 ACRES, MORE OR LESS.

GRIDS:
 SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=60'
 DRAWN BY: TH
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MOA CASE No.: N/A



The Boutet Co.
 601 East 57th Place, Suite 9102
 Anchorage Alaska, 99518
 PHONE (907) 522-8778 FAX (907) 522-8779
 License No. AECC957 - thoffman@tbcoak.com

S 12867 JAN 05 2026

Lot 1
BLOCK 1

HOLTAN HILLS
SUBDIVISION
TRACT 5

HOLTAN HILLS
SUBDIVISION
TRACT 4

GIRDWOOD ELEMENTARY
SCHOOL SUBDIVISION
TRACT A1A

ATHABASCAN
TRAIL

GIRDWOOD SCHOOL

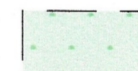
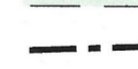


GLACIER CREEK

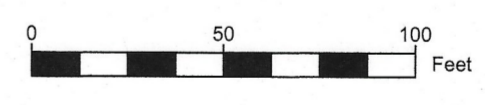
ASLS 74-131
GIRDWOOD AIRPORT

GLACIER CREEK OHW

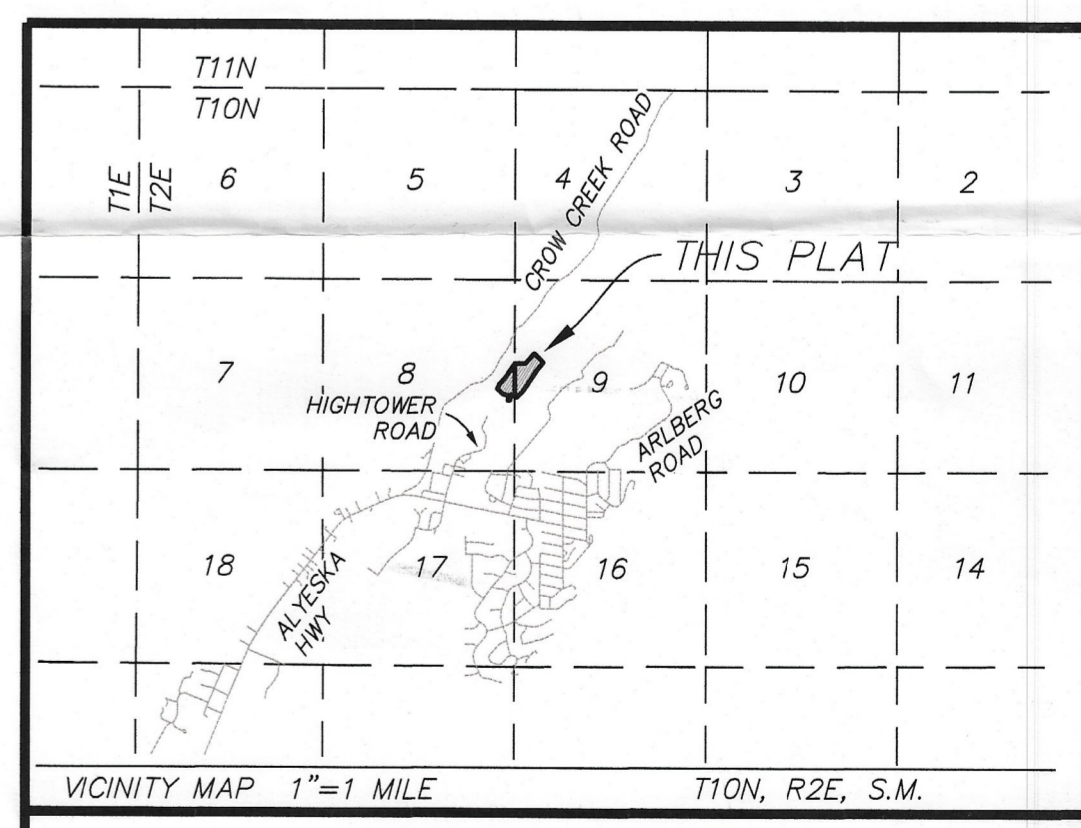
NOTES:
1. SEE MOA 1PP AGREEMENT 25-001 AND AWWU PRIVATE PERMIT S25-003 FOR MORE INFORMATION

LEGEND

-  MAPPED WETLANDS
-  MAPPED STREAMS
-  EXISTING AWWU WATER LINE
-  EXISTING CONTOUR (2' INTERVAL)



Zoning: GR-3, GOS and GIP



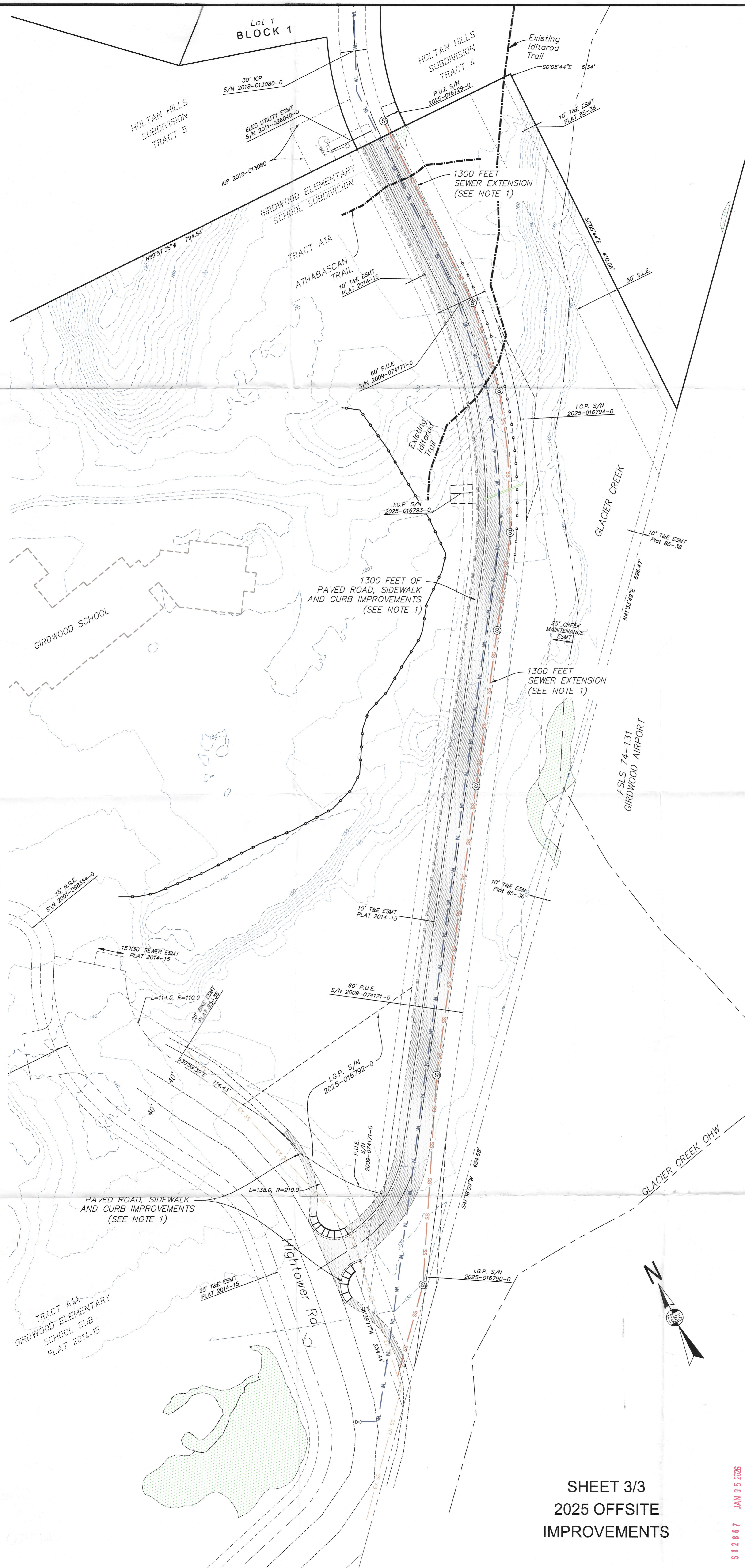
PRELIM PLAT
**HOLTAN HILLS
 PHASE 1**
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9,
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GRIDS:
SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=50'
 DRAWN BY: TH
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MOA CASE No.: N/A



SHEET 3/3
 2025 OFFSITE
 IMPROVEMENTS

S 112867 JAN 03 2026





AFFIDAVIT OF POSTING

Case Number: 2026-0005
512867

I, BRAYDEN HERD, hereby certify that I have posted a **Notice of Public Hearing** as prescribed by Anchorage Municipal Code 21.03.020H.5. on the property that I have petitioned for C.U. PUD / FRESH PLAT. The notice was posted on 12/01/2025 which is at least 21 days prior to the public hearing on this petition. I acknowledge this Notice(s) must be posted in plain sight and displayed until all public hearings have been completed.

Affirmed and signed this FIRST day of DECEMBER, 2025.

Brayden Herd
Signature

LEGAL DESCRIPTION

Tract or Lot 1
Block _____
Subdivision HOLTAN HILLS
2024-18

NOTICE OF
PUBLIC HEARING
Municipality of Anchorage - Planning Department

Case Type
SUBDIVISION

Case Number
S12067

S
SUBDIVISION

Public Hearing Location:
City Planning Center
Anchorage, Alaska
2022 Second Street
Anchorage, AK 99502

Re: **SUBDIVIDE 1 TRACT INTO 59
LOTS & 2 TRACTS WITH VARIANCES
TO ROW DEDICATION, CURB-SAC
LEIGH & LOT REDUCTION**

The hearing is scheduled for 10:00 AM on 1/13/11
at the location listed above.

Attachment 3.

Comments

Case S12867

Public Comments: s12867

Commenter	Email	Phone Number	Submitted
Carl			12/12/2025 3:37:34 PM
<p>1. AMC 25.40 – HLB Land Disposal Requirements AMC 25.40 requires that municipal land disposals: * be competitively solicited, * achieve fair market value, * and clearly serve the Municipality’s best interest. The Agreement conveys large, valuable tracts of Girdwood land to CY Investments without a guaranteed purchase price, without evidence of competitive solicitation, and without demonstrating public benefit — all inconsistent with AMC 25.40’s requirements.</p> <p>2. AMC 7.20 – Procurement Code CY Investments receives multiple forms of compensation that constitute professional and construction-management services, including: * 3.5% project-management fee, * 3% marketing fee, * 1% administrative fee, * reimbursement of internal costs and overhead. Normally, these services must be competitively procured under AMC 7.20. If no RFP or RFQ was issued, the Agreement may violate procurement law.</p> <p>3. Failure to Achieve Fair Market Value A December 2021 Municipal appraisal valued the Holtan Hills land at \$2.1 million. Despite this, the Municipality conveyed the land with no upfront compensation and no public-interest justification for discounting the value. This raises significant concerns under AMC 25.40’s fair-market-value requirement.</p> <p>4. Property Tax Undervaluation (AMC 12.05 – “Full and True Value”) The parcels deeded to CY Investments are assessed at approximately \$260,000 each, totaling less than the City’s own appraisal. This contradicts AMC 12.05’s mandate for uniform and true-value assessment and constitutes an ongoing tax subsidy to the developer.</p> <p>5. Developer Is Insulated from Risk While Receiving Multiple Forms of Guaranteed Compensation This is one of the most troubling aspects of the Agreement. In standard development practice: * Developers fund entitlements, engineering, and infrastructure. * Developers repay themselves through lot sales. * Developers bear cost overruns and unforeseen conditions. * Developers earn profit after risk is taken. None of this applies here. Under the Agreement: * The Municipality pays for all off-site improvements, including overruns. * The Municipality bears all extraordinary costs, including landfill remediation. * CY Investments is reimbursed for internal project expenses. * CY Investments receives guaranteed fees (3.5%, 3%, 1%) regardless of project performance. * Off-site costs paid by the Municipality are not reimbursed from project revenue. * Because the public finances the infrastructure, CY’s profit margin is artificially inflated — she earns more because taxpayers shoulder her usual costs. * No mechanism exists for the Municipality to recover its infrastructure expenditures, even though these expenditures directly increase the value of the lots CY will sell for profit. This structure exposes the Municipality to unlimited downside, while guaranteeing protected profit to a private developer. It is the opposite of prudent public-private</p>			

partnership structuring and raises serious questions about compliance with:

- * AMC 25.40 (public-interest requirement)
- * Article VIII of the Alaska Constitution (maximum public benefit)
- * Basic fiduciary responsibility over public resources

The economic structure of the Agreement cannot reasonably be construed as serving the public interest.

6. Alaska Constitution Article VIII – Maximum Benefit to the People

Public resources must be managed for the maximum benefit of Alaska's people. The Agreement shifts risk to the public, guarantees private profit, and contains no affordability or workforce housing guarantees. This imbalance is inconsistent with constitutional obligations.

7. Conflict of Interest Concerns (AMC 1.15)

The developer may benefit from:

- * management fees,
- * administrative fees,
- * marketing fees,
- * profit-sharing,
- * real estate commissions.

Layered financial benefit from public assets raises conflict-of-interest issues.

8. Open Meetings Act Issues (AS 44.62.310)

If negotiations or deliberations occurred outside properly noticed meetings, they may violate the Alaska Open Meetings Act.

The Holtan Hills Agreement relies on a financial structure that protects the developer from loss, exaggerates private profit at public expense, undervalues public land, and fails to meet the legal, financial, and constitutional standards required for public land disposal. These issues justify immediate pause, full legal review, and potential revision.

Sean Marx

deft_15_tux@icloud.com

12/13/2025 3:02:18 PM

PO Box 1021
Girdwood, AK 99587

AO 137 original disposal ordinance is void for reason eluded to in no site-specific land use study, violation of procurement code and public notice claims blatantly ignored as many Alaskan citizens appeared and testified on-record against land disposal. Under Girdwood 21.09 E Area Master Planning Mandatory in GR-3 zoning district I surmise this is a bogus argument claiming the Crow Creek neighborhood use plan was adopted in 2006 and it had a development schedule that to build houses in 2010 (including plat approval) when Land Bank was going to be main developer. Abandonment of Master Plan A and B. Expiration. You can't approve this plat due to one or all the claims eluded to in the following arguments. A response is demanded. I seek to deny plat approval and preserve the status quo by halting ongoing irreversible harm to public lands from the Holtan Hills development. Potential third party scrutiny, such as a court of proper jurisdiction will find the plat and disposal violates municipal procedures, and this plat approval and continued activity will destroy wetlands and old-growth forest before a neutral "third party" can potentially rule on the merits. Plat denial is requested to prevent irreparable environmental and community injury. Heritage Land Bank (HLB) issued RFP 2021P015 on April 28, 2021; the selected proposal (June 2022) relied on a team including CY Investments, Seth Andersen, P.E., and Pomeroy Property Development. Pomeroy and Andersen withdrew by early 2024, materially altering the proposal without re-bid or re-approval. The Assembly approved the flawed disposal on January 23, 2024 via AO 2023-137. Notice was inadequate; no site-specific study conducted. The "best interest" finding was unsupported amid documented community opposition, including GBOS objections. Construction began September 2025, filling ~6.8 acres of wetlands and removing forest under USACE Permit POA-2021-00492. Further, neutral party review is requested for AMC Title 25 Violations because this land disposal and proposed platting lacks a site-specific study (AMC 25.40.025(C)), undermined the competitive process by ignoring partner withdrawals (AMC 25.40.025(D))— essentially "donating" this land to "one individual" for development— and features an arbitrary "best interest" finding under (AMC 25.40.020, .025). Frustration of Purpose exists – party withdrawals altered the core proposal without re-approval, frustrating its purpose. There is a Public Trust Breach because the disposal and plat fails maximum public benefit (Art. VIII, Alaska Const.), again conveying the land to one "individual" in what many Alaskans have termed a "sweetheart deal," serves to bolster procedural claims herein. Plat denial is probable given clear procedural lapses. Irreparable Harm Will Occur Absent third "neutral" party interventions because the ongoing clearing destroys wetlands and forest—irreparable environmental harm not compensable by money. Construction alters the status quo, moots claims before potential third party intervention. Community impacts (infrastructure strain, loss of public resources) are imminent and irreversible. Denying the plat preserves public lands for all Alaskans- not just for the financial gain of "one Alaskan" and I stand behind my analysis as a Alaskan resident and Anchorage taxpayer safeguarding municipal compliance by enforcing Alaskan plat and land disposal laws and claim that protecting this resource serves the public interest (Art. VIII, Alaska Const.).

Sean R Marx

PO Box 1021
Girdwood, AK 99587

deft_15_tux@icloud.com

12/13/2025 5:20:21 PM

I am writing as an Alaskan resident and Anchorage taxpayer to formally request denial of the proposed plat approval for the Holtan Hills development. This request is based on multiple procedural and legal deficiencies under Anchorage Municipal Code (AMC) Title 25 and related planning requirements, as outlined below:

1. Lack of Site-Specific Land-Use Study

AMC 25.40.025(C) requires a site-specific land-use study when existing plans do not adequately evaluate the parcel. No such study was conducted prior to AO 2023-137, leaving critical issues—such as infrastructure, environmental sensitivity, and community compatibility—unaddressed.

2. Procurement Violations and Partner Withdrawals

The original RFP (2021P015) awarded the project to a team including CY Investments, Pomeroy Property Development, and Seth Andersen. By early 2024, Pomeroy and

Andersen withdrew, materially altering the proposal. AMC §25.40.025(D) mandates competitive integrity in disposals; no re-bid or public re-approval occurred after these withdrawals.

3. Unsupported "Best Interest" Finding

AMC §25.40.025(B) requires a documented finding that the disposal serves the municipality's best interest. This finding was unsupported:

- No site-specific study was completed.
- Public testimony, including strong opposition and GBOS objections, was disregarded. The ordinance therefore lacks a factual basis and fails procedural standards.

4. Expired Master Plan

Under AMC §21.09 (Girdwood Area Plan), GR-3 zoning requires a master plan. The Crow Creek Neighborhood Plan (2006) anticipated development by 2010 under a land-bank model, which never occurred. The plan has effectively expired and cannot authorize current platting.

5. Public Trust Breach and Irreparable Harm

Article VIII of the Alaska Constitution requires maximum public benefit in land disposals. This transaction benefits a single private entity, resembling a "sweetheart deal." Construction began in September 2025, clearing old-growth forest and filling ~6.8 acres of wetlands under USACE Permit POA-2021-00492. These impacts are irreversible and will moot any future judicial review.

Requested Actions:

1. Deny plat approval for Holtan Hills.
2. Halt ongoing land disturbance until:

- A site-specific land-use study is completed (§25.40.025(C)),
- A new competitive process addresses partner withdrawals (§25.40.025(D)),
- A documented "best interest" finding is provided (§25.40.025(B)),
- Environmental impacts are fully reviewed.

3. Preserve the status quo to prevent irreparable harm and allow neutral review.

Conclusion:

Approving this plat under current conditions violates municipal code, undermines public trust, and risks irreversible environmental and community harm. Denial is necessary to uphold the law and protect public lands for all Alaskans.

Thank you for your attention to this matter. I respectfully request a written response.

Sincerely, Sean R Marx, Alaskan Resident

Public Comments: s12867

Commenter	Email	Phone Number	Submitted
<p>Brooks Chandler PO Box 1129 GIRDWOOD, AK 99587</p>			<p>12/9/2025 2:44:53 PM</p>
<p>The Platting Board/Planning Commission should postpone action on the plat application until an area master plan has been approved by the Anchorage Assembly. A valid and approved area master plan is required. "Prior to subdivision or development of any portion of" the GR-3 district. AMC 21.09.040(B)(2)(d)(iii)(A) .</p> <p>There was an area master plan approved in 2006, however that approval expired by operation of AMC 21.09.030(E)(7)(a):</p> <p>7.Abandonment of area master plan.</p> <p>An area master plan approval shall expire if:</p> <p>a. Implementation of the area master plan schedule is delayed for more than seven years without a request for a schedule modification.</p> <p>The construction schedule in the Crow Creek Neighborhood Land Use Plan called for homes to be built beginning in 2007. CCNUP p.32. This schedule has been delayed for 18 years which is more than 7 years. It appears no request for a schedule modification was submitted or approved. Therefore the prior approval of the CCNLUP has expired. This means there is no existing area master plan. Platting must be delayed until a new area master plan has been approved.</p> <p>If the Board/Commission ignores municipal code the following changes/additions to the Plat should be made:</p> <p>Add a Plat Note to read: One of Lots 12 and 13, Block 1 has been designated for conveyance to a Girdwood housing trust or non-profit for the purposes of developing community housing for residents. See, AO 2023-037 Sec.1(D).</p> <p>Add a Plat Note to read: One of the following Lots has been designated for conveyance to a Girdwood housing trust or non-profit for the purposes of developing community housing for residents:</p> <p>a. Lots 1-11 , Block 1 b. Lots 1-19, Block 2 c. Lots 1-9, Block 3. See, AO 2023-037 Sec.1(D).</p> <p>Add a Plat Note to read: Any person seeking to develop lots must submit applications for land use entitlements to the Girdwood Board of Supervisors for review prior to seeking official action by the designated decision-making body. See, AO 2023-037 Sec. 1(C).</p> <p>Add a Plat Note to read: Use of lots for short term rentals is restricted. See AO 2023-037 Sec. 1(A).</p> <p>Comments on requested variances. Private Road- [Internal Tract B-Holtan Hills Circle] The variance should be denied. It appears all Lots in Phase 1 including the 2 multi-family lots (Lots 12 and 13 Block 1) would be expected to contribute to road maintenance of the proposed private driveway. ("The proposed road will be maintained by the Homeowner's Association"). This would make housing costs more expensive compared to spreading the costs of road maintenance over the entire service area. This makes granting the variance "injurious" to these lots and detrimental to the public welfare. Injury to the public welfare results from making houses/lots less affordable. The purported faster response time reflects ignorance of the existing sequence of snow removal in the Girdwood Valley Service Area (all of which is done by a private contractor NOT "the municipality") . Priority #1 is the road to the school and logic/efficiency will</p>			

dictate the contractor move to Holtan Hills immediately after plowing the road to the school. I have no comment on whether a variance allowing a 50' public ROW is justified.

Cul de Sac Length

The applicant has referenced the wrong code provision. The site development rules for the gR-3 district state :

"Street connection-

b. Connectivity standards.

i. Within contiguous residential and commercial developments, no local street may be developed longer than 450 feet, unless the street is connected to another street at each end.

This means the degree of variance requested is 242 feet i.e. a 53% variance from the standard. Perhaps the variance remains justified. Girdwood has quite a few cul de sacs. But I assume there are health and safety reasons for the existing 450' standard. If the variance is granted a condition requiring connection with Crow Creek Road in the next development Phase as referenced in the application should be added. A condition requiring construction of a pedestrian walkway parallel to the proposed Holtan Hills Drive would mitigate pedestrian safety issues associated with an extra long cul de sac.

Other Conditions

Resubmittal of a proposed Iditarod Trail dedicated easement location should be required before a final plat is submitted for approval. Condition should make clear that trail relocation including trail construction and signage is an obligation of the applicant and must be completed and be acceptable to USFS and the Girdwood Trails Committee prior to final plat approval.

Public Comments: s12867

Commenter	Email	Phone Number	Submitted
Kate PO Box 1025 Girdwood, AK 99587	kesandberg@gmail.com	9075757301	12/6/2025 12:06:29 PM
	<p>This plat application does not include an easement for the National Historic Iditarod Trail that did travel through land that is now Phase 1 of Holtan Hills.</p> <p>The trail is of national significance. See the 1986 Iditarod Comprehensive Management Plan. This trail should be surveyed, and an easement recorded on the plat and paid for by the development partnership of CY and HLB.</p> <p>CY Investments was quite aware of the significance of the trail when they applied originally. Too, this trail will become the main walking trail for Holtan Hills residents who walk anywhere in Girdwood, and CY has heavily advertised Holtan Hills as a walking, outdoorsy subdivision.</p> <p>A condition for approval of this plat must include the realignment of the Girdwood Middle Iditarod National Historic Trail and a 50' easement (on either side of center line). This should be done in consultation with and approval of the Girdwood Trails Committee. This ensures that the national trail is protected, and the Girdwood Trails Committee--the people who live here--has had input in this realignment.</p> <p>It is critical that this trail be platted and approved for an easement now for the above reasons.</p>		

DATE: December 10, 2025

**TO: Elizabeth I. Appleby, AICP, Manager & Platting Officer, Planning Department,
Current Planning Division**

FROM: Kaleigh Jones, Engineering Technician III, Planning Section, AWWU

RE: Plat Case Comments

Meeting Date: January 5, 2026

Agency Comments Due: December 8, 2025 (extension requested)

The Anchorage Water & Wastewater Utility has reviewed the reference plat(s) and has the following comments:

S12867 Tract 1, Holtan Hills Subdivision (Plat 2024-18) - Request to subdivide one (1) tract of land into thirty-nine (39) lots and two (2) new tracts; and request for three (3) Subdivision Variances seeking relief from: 1) AMC 21.08.030L.1. to allow the proposed upper nine (9) lots in Block 3 to have frontage on Holtan Hills Circle; 2) AMC 21.08.040A.1. to allow the Holtan Hills Circle to be encompassed in a 50-foot private access tract; and 3) AMC 21.08.030F.6. to allow the maximum cul-de-sac length to be 670 feet, Grid SE4615, SE4616, SE4715, SE4716

1. This parcel is located within AWWU's water and sanitary sewer service districts.
2. Holtan Hills Tr 1 is considered benefitted by the 16-inch Ph II-B Water Transmission main currently located within an Intragovernmental Use Permit. The water main will be located within the proposed 60-foot Holtan Hills Drive Right-of-Way after completion of the platting action.

Per DCPM 40.03.03.01 "Any proposed water service connection to an AWWU transmission main must be approved by the AWWU Engineering Division Director. All requests for connections are to be in writing from the legal owner of the parcel. Requests will be reviewed on a case by case basis with a written response for approval or denial..."

Per AWU Tariff Rule 9.3.G, "...The Utility will only authorize a connection to a Transmission Main if the main operates at an adequate pressure to provide service, a Service Connection can be constructed to the standards of the most current edition of the Utility's design and construction practices manual, failure of the Service Connection would not present a significant risk to area wide service

and, at the Utility's discretion, extension of a Distribution Main is unwarranted.” The Ph II-B Transmission main currently operates in excess of 100 pounds per square inch (PSI).

3. Current Holtan Hills Tr 1 is not benefited by sanitary sewer service. The sewer main constructed during the off-site development phase (Private Development Agreement S25-003) is entirely within the bounds of Girdwood Elementary School Tr A1A south of the proposed development site. No other parcels are fronted by this main. Please coordinate with AWWU Private Development for a sewer main extension.
4. Water and sewer easements may be required on the southeast side of Holtan Hills Drive. Confirm the water and sewer mains have 15-feet of easement and/or Right-of-Way protection on either side of main centerline. Proposed Tr 1A and Block 2 Lots 1 – 11 will need to be evaluated for additional easements. Please provide a draft to AWWU Planning after the water line has been surveyed per proposed Note 3 on the draft plat. A 30-foot sewer easement will be required in proposed Tr 1B, it shall be centered on the sewer main, this may impact Block 3 Lots 1-3, and Block 1 Lot 12.
5. Parcels with frontage on the proposed Holtan Hills Drive will be assessed in accordance with AWU Tariff Rule 8.2.B.1 at the 2011 LUC rate of \$0.96122 per square foot on the area fronting Holtan Hills Drive up to 150 feet back. Parcels benefited by the proposed sanitary sewer main extension will be assessed for sewer trunk in accordance with ASU Tariff Rule 8.2.A.1 at the LID-GA60 rate of \$0.00599 per square foot on the total area of the parcel. *No assessments will be triggered by this platting action.*
6. AWWU has no objection to this platting action.

If you have any questions pertaining to public water or sewer, please call (907) 564-2739 or send an e-mail to landuse@awwu.biz.

Kimmel, Corliss A.

From: Walters, Michael S.
Sent: Tuesday, December 9, 2025 10:30 AM
To: Blake, Lori A.; Kimmel, Corliss A.
Subject: S12867 Request for Reviewing Agency Comments

All:

ROW has the following comments for case number S12867:

ROW has no comment or objections on the proposed action.

Regards,

Michael S Walters
Senior Plan Reviewer
Right of Way Section
michael.walters@anchorageak.gov
Office: 907-343-8226
Cell: 907-727-7637
Fax: 907-249-7910



Date: December 2, 2025

To: MOA Current Planning Division

From: Chugach Electric Association, Inc. (Chugach)

Subject: MOA Case No. S-12867
Tract 1, Holtan Hills Subdivision (Plat 2024-18)
Preliminary Plat: Lots 1-19, Block 1, Lots 1-11, Block 2, Lots 1-9 Block 3 and
Tracts 1A and 1B, Holtan Hills, Phase 1

Chugach has the following comments:

1. Chugach has no objection to the preliminary plat of Lots 1-19, Block 1, Lots 1-11, Block 2, Lots 1-9 Block 3 and Tracts 1A and 1B, Holtan Hills, Phase 1 Subdivision, a re-subdivision of Tract 1, Holtan Hills Subdivision (Plat 2024-18)
2. New 15' T&E easements are required along both sides of the proposed Holtan Hills Circle and Holtan Hills Road boundary lines of the preliminary plat.

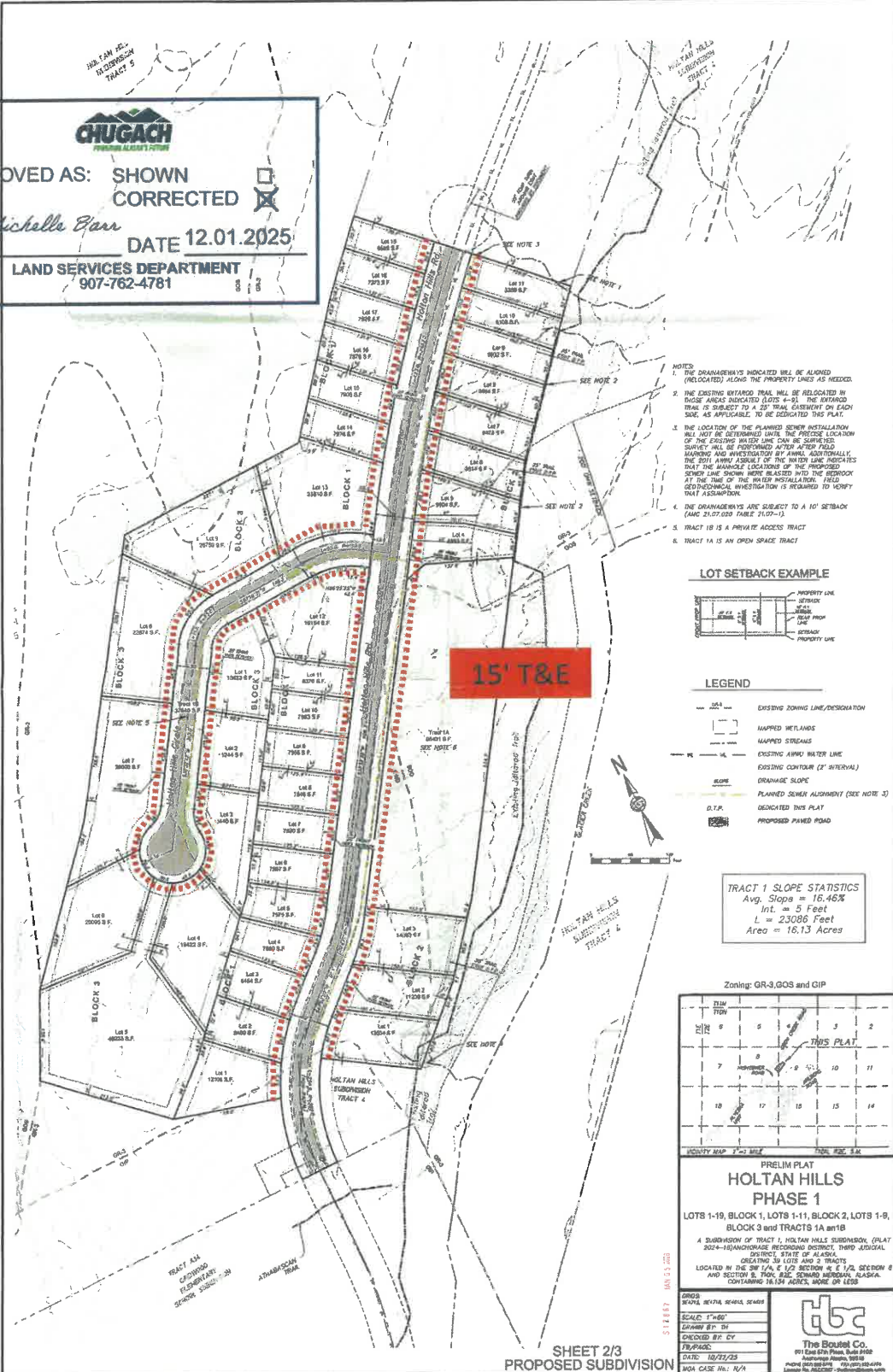


APPROVED AS: SHOWN
CORRECTED

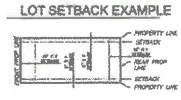
Michelle Barr

SIGN DATE 12.01.2025

LAND SERVICES DEPARTMENT
907-762-4781



- NOTES:
1. THE DRAINAGEWAYS INDICATED WILL BE ALIGNED (RELOCATED) ALONG THE PROPERTY LINES AS NEEDED.
 2. THE EXISTING OUTFALL TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-10). THE OUTFALL TRAIL IS SUBJECT TO A 25' TRAIL EASEMENT ON EACH SIDE AS APPLICABLE TO BE DESIGNATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. MARKING AND IDENTIFICATION BY ANNUAL ADDITIONALLY THE SITE ANNUAL SURVEY OF THE WATER LINE INDICATES THAT THE APPROXIMATE LOCATIONS OF THE PROPOSED SEWER LINES SHOWN WERE BLACKED INTO THE RECORD AT THE TIME OF THE WATER INSTALLATION. FIELD GEO-TECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
 4. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (SEE SETBACK TABLE 2107-11).
 5. TRACT 1B IS A PRIVATE ACCESS TRACT
 6. TRACT 1A IS AN OPEN SPACE TRACT



LEGEND

- EXISTING ZONING LINE/DESCRIPTION
- HAPPED WETLANDS
- HAPPED STREAMS
- EXISTING ABOVE WATER LINE
- EXISTING CONTOUR (2' INTERVAL)
- DRAINAGE SLOPE
- PLANNED SEWER ALIGNMENT (SEE NOTE 3)
- DESIGNATED THIS PLAT
- PROPOSED PAVED ROAD

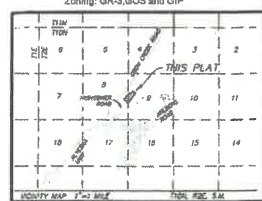
TRACT 1 SLOPE STATISTICS

Avg. Slope = 16.46%

Int. = 5 Feet

L = 23086 Feet

Area = 16.13 Acres



PRELIM PLAT
HOLTAN HILLS
PHASE 1

LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-8, BLOCK 3 and TRACTS 1A and 1B

A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION (PLAT 2004-18) IN BRANCHVILLE RECORDING DISTRICT, THIRD ALGOLIA DISTRICT, STATE OF ALASKA.

CREATING 36 LOTS AND 2 TRACTS

LOCATED IN THE SW 1/4, E 1/2 SECTION 4, T 12N, R 12E, S 14W, CONTAINING 16.134 ACRES, MORE OR LESS

DRWS: [Name]

SCALE: 1"=40'

DRAWN BY: [Name]

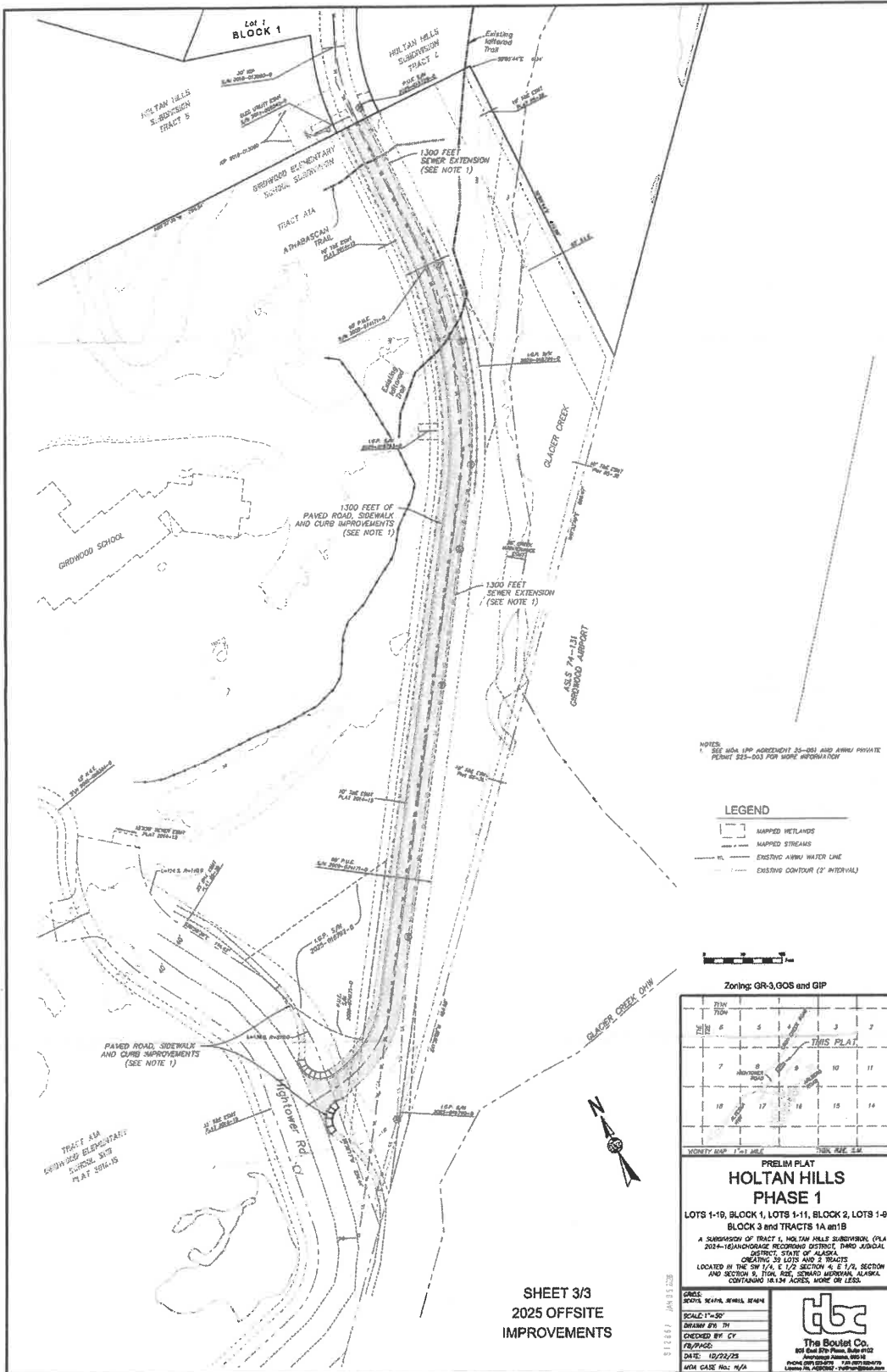
CHECKED BY: [Name]

DATE: 12/11/25

MOA CASE NO.: N/A



SHEET 2/3
PROPOSED SUBDIVISION



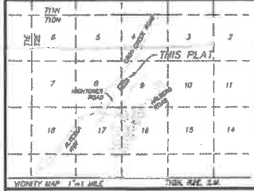
NOTES:
 1. SEE AWA LPP AGREEMENT 25-001 AND AWAU PRIVATE PERMIT 223-003 FOR MORE INFORMATION

LEGEND

- MAPPED WETLANDS
- MAPPED STREAMS
- EXISTING AWAU WATER LINE
- EXISTING CONDUIT (2" MINIMUM)



Zoning: GR-3, GOS and GIP

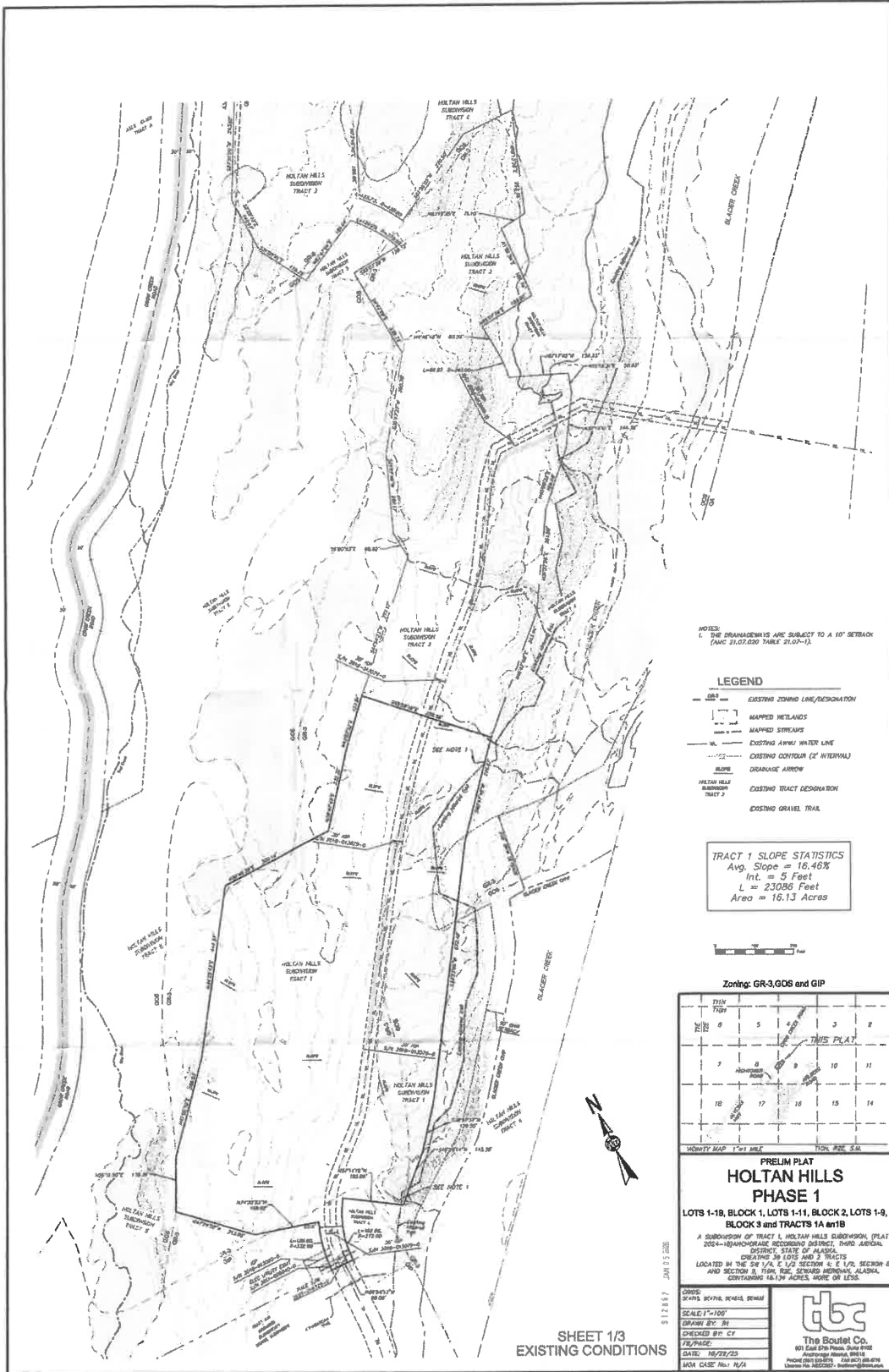


PRELIM PLAT
HOLTAN HILLS
PHASE 1
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-6, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION (PLAT 2024-164 AND 2024-165 RECORDING DISTRICT, BARO JUDICIAL DISTRICT, STATE OF ALASKA)
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4, E 1/2 SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA
 CONTAINING 18.124 ACRES, MORE OR LESS

DATE: 12/22/25
 AWA CASE NO: N/A



SHEET 3/3
2025 OFFSITE
IMPROVEMENTS



NOTES:
 1. THE DRAINAGES ARE SUBJECT TO A 10' SETBACK (MNC 21.07.020 TABLE 21.07-1).

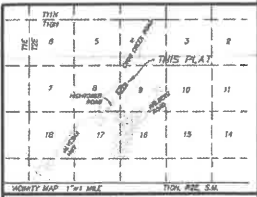
LEGEND

- EXISTING ZONING LINE/DESIGNATION
- - - MAPPED WETLANDS
- - - MAPPED STREAMS
- - - EXISTING ARROYO WATER LINE
- - - EXISTING CONTROL (2' INTERVAL)
- DRAINAGE ARROW
- HOLTAN HILLS SUBDIVISION TRACT 1
- HOLTAN HILLS SUBDIVISION TRACT 2
- EXISTING GRAVEL TRAIL

TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23085 Feet
 Area = 16.13 Acres



Zoning: GR-3, G06 and G1P



PRELIM PLAT
HOLTAN HILLS
PHASE 1
 LOTS 1-18, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT L, HOLTAN HILLS SUBDIVISION, (PLAT 2004-1-NONCONFORMANCE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA), CREATED BY LOTS AND 2 TRACTS LOCATED BY THE SW 1/4, E 1/2 SECTION 4, E 1/2 SECTION 8 AND SECTION 9, T10N, R16E, SEWARD MERIDIAN, ALASKA, CONTAINING 16.13 ACRES, MORE OR LESS.

DATE: 12/22/22
 CHECKED BY: CF
 DRAWN BY: JH
 SCALE: 1"=100'
 12/28/22 JAN 01 2023

The Boutel Co.
 601 East 57th Avenue, Suite 6702
 Anchorage, Alaska 99516
 PHONE (907) 552-8776 FAX (907) 552-8775
 WWW.THEBOUTELCO.COM

SHEET 1/3
EXISTING CONDITIONS



Municipality of Anchorage
Project Management and Engineering
MEMORANDUM



DATE: December 8, 2025

TO: Elizabeth Appleby

FROM: Kyle Cunningham

SUBJECT: Cases 2026-0005 & S12867: Comments from Watershed Management Services.

Watershed Management Services (WMS) has the following comments for the January 5, 2026 Planning and Zoning Commission hearing:

- 2026-0005 - Tract 1 Holtan Hills Subdivision (Plat 2024-18);
 - Based on the plans submitted this project likely qualifies as a “Large” project as per Section 3 of the Anchorage Stormwater Manual (DCM Ch.2). How will the project satisfy the stormwater treatment and extended detention requirements of Section 3? (i.e., Water Quality Treatment Sec. 3.3.2.1, Extended Detention Sec. 3.3.2.2, and Detention and Peak Flow Control Sec. 3.3.2.4 and 3.3.2.5).
 - If the application of Green Infrastructure for this project is deemed infeasible, please provide a Green Infrastructure Feasibility Form (DCM Ch.2 Appendix L) stating the constraining elements that prevent the use of or severely restrict the overall function and benefit of Green Infrastructure techniques (DCM Ch.2 Sec. 3.3.2.1).
 - Prior to recording a final plat, resolve with Private Development the need for and location of drainage easements. This is needed to allow existing drainage patterns to cross the new property lines and to allow for future drainage improvements to connect to the best reasonable public storm drain system.
- S12867 - Tract 1, Holtan Hills Subdivision (Plat 2024-18);
 - Based on the plans submitted this project likely qualifies as a “Large” project as per Section 3 of the Anchorage Stormwater Manual (DCM Ch.2). How will the project satisfy the stormwater treatment and extended detention requirements of Section 3? (i.e., Water Quality Treatment Sec. 3.3.2.1,

Extended Detention Sec. 3.3.2.2, and Detention and Peak Flow Control Sec. 3.3.2.4 and 3.3.2.5.

- If the application of Green Infrastructure for this project is deemed infeasible, please provide a Green Infrastructure Feasibility Form (DCM Ch.2 Appendix L) stating the constraining elements that prevent the use of or severely restrict the overall function and benefit of Green Infrastructure techniques (DCM Ch.2 Sec. 3.3.2.1).
- Prior to recording a final plat, resolve with Private Development the need for and location of drainage easements. This is needed to allow existing drainage patterns to cross the new property lines and to allow for future drainage improvements to connect to the best reasonable public storm drain system.

RECEIVED



Iditarod Historic Trail Alliance
3705 Arctic Blvd #272
Anchorage, AK 99503-5774
iditarodhta@gmail.com



DEC 08 2025
512867

December 8, 2025

Municipality of Anchorage
Planning Department
PO Box 196650
Anchorage, AK 99519-6650

To Whom It May Concern,

The Iditarod National Historic Trail (INHT) spans 2,400 miles of winter and summer routes between Seward and Nome, Alaska. The Iditarod Historic Trail Alliance (Alliance) is a statewide nonprofit organization chartered to advance the knowledge, appreciation, and enjoyment of the historic Iditarod Trail. **We submit these comments to urge the Municipality to honor its intent to maintain a continuous route for the Iditarod Trail in Girdwood.**

In 2009 this Alliance passed a resolution to support preservation of adequate easements for INHT passage through Girdwood and Glacier Valley, with an ideal easement of 200 feet wide. This is further supported by the following:

- *Municipality of Anchorage Real Estate Department: Heritage Land Bank 2025 Annual Work Program & 2026-2030 Five Year Management Plan*, as approved by the Anchorage Assembly in 2025, which states about this segment: "A trail easement will be required to develop the INHT north of Hightower Road along the privately-owned Holtan Hills properties and up valley to Crow Creek and Winner Creek Trails" (AR 2025-103, as amended)
- The *Girdwood Trails Plan*, adopted as an element of the Anchorage Municipal Comprehensive Plan in 2024, identifies an Iditarod Trail along the west side of Glacier Creek through the tract now slated for Holtan Hills (AO No. 2024-21)
- The *Girdwood-Iditarod Trail Route Study*, approved by the Anchorage Municipal Assembly as a guide to the Iditarod commemorative trail in Girdwood Valley in 1997, identified the west side of Glacier Creek as the preferred alignment for the trail (AR97-84)
- *INHT Comprehensive Management Plan*, Bureau of Land Management - Anchorage District Office, 1986
- *The Iditarod Trail (Seward-Nome Route) and other Alaska Gold Rush Trails*, Department of the Interior, 1977

The INHT was designated in 1978 under the National Trail System Act (NTSA) to commemorate the Seward-Nome route. This route was actively used from 1908 on to connect to gold fields in northern Alaska from the port in Seward. Maps of this trail show that after descending Turnagain Pass, the trail followed the north side of Turnagain Arm before turning north into the Girdwood-Glacier Creek Valley and continuing to Crow Pass. This route is well described far earlier than 1908 and was likely always used by people traveling, trading, and living in the area. Before the railroad, Crow Pass and

Ship-Indian Pass were the primary routes to connect territory south of Turnagain Arm to areas north.

It is critical to maintain a continuous public trail connecting Turnagain Arm to Crow Pass through the Girdwood-Glacier Creek Valley that offers both (a) a public right-of-way and (b) a scenic, natural character reflective of the historic experience. It may be considered that the road through the Girdwood-Glacier Creek Valley is the relevant State of Alaska RS 2477 and public access is thereby fulfilled. However, a trail through the Girdwood-Glacier Creek Valley is clearly included as part of the congressionally-designated historic trail under NTSA. Section 2 of NTSA describes its intent: to provide for the outdoor recreation needs of America's people and to promote the preservation of open-air, outdoor areas and historic resources, *especially in urban areas, scenic areas, and along historic travel routes*. As Girdwood becomes increasingly urban, the need for trails becomes more, rather than less, relevant.

Without having assessed specific route proposals, the Alliance supports the concept of rerouting the public use trail away from proposed development and establishing an adequate conservation easement to preserve a historic character and scenic experience to the trail. Our 2009 resolution recommended a minimum 200 foot easement corridor. We recommend that said conservation easement is held by a land trust or other appropriate private entity so that it is protected in perpetuity.

We further urge that a well-designed trail be built and maintained as part of any development that alters the existing trail. The 1997 Route Study and 2024 Trail Plan (both cited above) identify that the existing "Middle Iditarod Trail" was the preferred and most feasible route between the Girdwood School and Crow Creek Mine. A sustainable reroute is likely a complex undertaking, and the party responsible for eliminating the existing trail should carry the responsibility. This is in keeping with the standard that a private property owner may reroute an RS 2477 easement on their own property, at their own expense. Anchorage Parks & Rec, Chugach National Forest, and local stakeholder groups such as Girdwood Trails Committee have expertise that can support identifying route alternatives.

The Alliance appreciates this opportunity to indicate our support for a continuous Iditarod Trail through Girdwood Valley.

Sincerely,

Betsi Oliver

Executive Director
executivedirector@iditarodhistorictail.org

File Code: 2350

Date: December 7, 2025

Municipality of Anchorage
Planning Department
PO Box 196650
Anchorage, AK 99519-6650

RECEIVED

DEC 08 2025

512867

Dear Director Babb,

Please accept these comments from the Glacier Ranger District of the Chugach National Forest (CNF), as it relates to management of the Girdwood segment of the Iditarod Trail. This trail segment begins down-valley at the Glacier District Office property and continues through the community of Girdwood on Municipality lands, until reaching a federal trail easement where the United States Forest Service (USFS) reserved trail management authority upon conveyance of the surrounding lands to the State. From here the CNF manages the primary route of the Iditarod north to the Chugach State Park boundary at Crow Pass, and south to Seward. In 1978, Congress amended the National Trails System Act to establish the Iditarod National Historic Trail (INHT) in recognition of this trail's national significance and the important role it has played in Alaska's history.

The Glacier Ranger District has long partnered with Girdwood Valley Service Area staff and Girdwood Trails Committee members in managing our respective trails within the Girdwood Valley. The Municipality of Anchorage, Girdwood Board of Supervisors, and the Glacier Ranger District have entered into a memorandum of understanding addressing Girdwood Valley Trails Cooperation. This agreement recognizes that many trails in Girdwood cross multiple jurisdictions, and there is value in working cooperatively in trail management. In 2017 Glacier Ranger District staff provided expertise to design a trail reconstruction of the Lower portion of the Girdwood Iditarod Trail, and the USFS trail crew provided some of the initial vegetative clearing as the Municipality prepped the project for completion by a contractor. Additionally, USFS and Municipal staff are currently engaged in a partnership for the development of a new trail bridge over Glacier Creek, on a nearby stretch of the INHT.

It is with this context that we have interest in the proposed platting for the planned residential development on Municipality lands. We understand that as drafted several of the proposed parcels would overlay a segment of the Iditarod Trail through Girdwood. Maintaining connectivity on this trail is critical for our shared trail users, and impacts to the trail in this location have the potential to affect the functionality of USFS managed trail segments. A well-managed and connected trail across land boundaries ensures the availability of high-quality trail user experiences for all.



On May 20th, 1997, the Anchorage Assembly passed a resolution approving the adoption of The Girdwood-Iditarod Trail Route Study as a guide for Iditarod management within the Girdwood Valley – the Chugach National Forest was a cooperator in this study. The study recognized the many ways that Girdwood was an important waypoint on the Iditarod Trail in the historic Gold Rush era. Research was conducted that revealed long forgotten stretches of the historic trail that still were largely intact but overgrown, climbing from town center towards Crow Pass and points north. It was determined to redevelop the trail through town, connecting the remaining historic segments with new segments where the historic route had subsequently been converted to roads or otherwise developed.

As the 1997 study stated, a redeveloped Iditarod route through Girdwood “could become a living monument to the history of mining, railroad building, and Alaskan frontier settlement, and be designated as a segment of the Iditarod National Historic Trail.” With much community effort the trail was reestablished and pieced together over the ensuing years. It has since become a point of pride for Girdwood residents and the resulting trail that threads through town up to National Forest lands has become a well-loved community resource.

The study recommended that in the middle Girdwood Valley the trail would “head north from the school, and then climb above Crow Creek Road to be located on the historic trail.” This is the affected area where the planned housing development and proposed platting is located, overlapping the trail as it was reestablished by the community.

We recommend that the trail through the affected area maintains connectivity, and is developed to a scale to accommodate anticipated use levels and to sustain exceptional trail experiences. We further recommend that the trail is adequately protected via an easement, in recognition of the trail’s importance to the community, state, and nation. The INHT Comprehensive Management Plan recommends trail easements for trail protection – this should be considered a best management practice. The establishment of an easement was further recommended in the Municipality’s 1997 Iditarod study, but to date this has not come to fruition.

Recent Girdwood Trail Committee resolutions recommend the establishment of a trail easement, and investment from the development partners to realign and improve the trail. These are appropriate recommendations that we support.

We look forward to a continued partnership with the Municipality of Anchorage in our management and stewardship of Girdwood Valley trails. Please feel free to reach out to CNF Trail Program Manager Will Brennan (william.brennan@usda.gov) for further coordination needs or questions.

Sincerely,

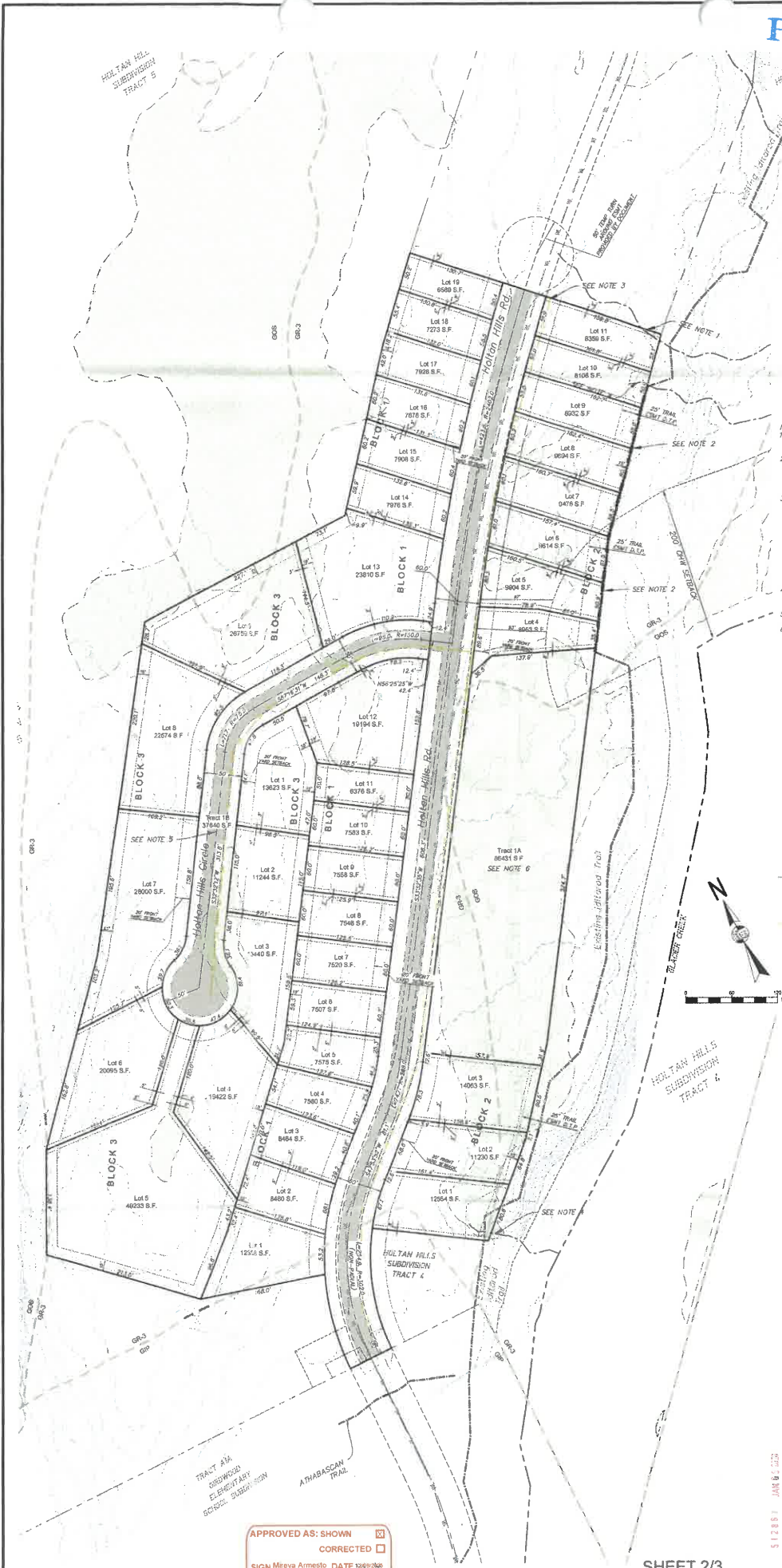
CHRISTOPHE
R STEWART

Digitally signed by
CHRISTOPHER STEWART
Date: 2025.12.08 13:37:10
-09'00'

CHRISTOPHER S. STEWART
District Ranger

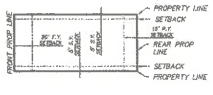
RECEIVED

DEC 08 2025
S12867



- NOTES:
1. THE DRAINAGEWAYS INDICATED WILL BE ALIGNED (RELOCATED) ALONG THE PROPERTY LINES AS NEEDED.
 2. THE EXISTING IDIAROD TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-8). THE IDIAROD TRAIL IS SUBJECT TO A 25' TRAIL EASEMENT ON EACH SIDE, AS APPLICABLE, TO BE DEDICATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. SURVEY WILL BE PERFORMED AFTER AFTER FIELD MARKING AND INVESTIGATION BY ANMS. ADDITIONALLY, THE 2011 ANNU ASBUILT OF THE WATER LINE INDICATES THAT THE MANHOLE LOCATIONS OF THE PROPOSED SEWER LINE SHOWN WERE BLASTED INTO THE BEDROCK AT THE TIME OF THE WATER INSTALLATION. FIELD GEOTECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
 4. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).
 5. TRACT 1B IS A PRIVATE ACCESS TRACT
 6. TRACT 1A IS AN OPEN SPACE TRACT

LOT SETBACK EXAMPLE



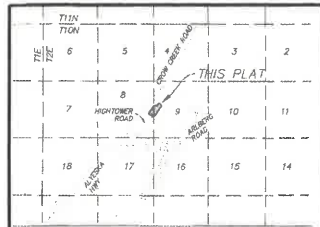
LEGEND

- GR-3 EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- EXISTING ANNU WATER LINE
- EXISTING CONTOUR (2' INTERVAL)
- DRAINAGE SLOPE
- PLANNED SEWER ALIGNMENT (SEE NOTE 1)
- DEDICATED THIS PLAT
- PROPOSED PAVED ROAD



TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres

Zoning: GR-3,G08 and GIP



PRELIM PLAT
HOLTAN HILLS
PHASE 1
 LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA
 CREATING 39 LOTS AND 3 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4, E 1/2 SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA, CONTAINING 16.134 ACRES, MORE OR LESS.

GRIDS: SE4716, SE4718, SE4613, SE4616
 SCALE: 1"=60'
 DRAWN BY: TW
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MDA CASE No.: N/A



APPROVED AS SHOWN
 CORRECTED
 SIGN: Miraya Armento DATE: 12/01/25
 GCI ENGINEERING & DESIGN

SHEET 2/3
PROPOSED SUBDIVISION



**Municipality of Anchorage
Project Management and Engineering**



MEMORANDUM

DATE: December 4, 2025
TO: Shawn Odell, Senior Planner
FROM: Brandon Telford, P.E., Engineering Manager
SUBJECT: Comments for Planning & Zoning Commission
Case # S12867

Case No. S12867: Request to subdivide one (1) tract of land into thirty-nine (39) lots and two (2) new tracts; and request for three (3) Subdivision Variances seeking relief from: 1) AMC 21.08.030L.1. to allow the proposed upper nine (9) lots in Block 3 to have frontage on Holtan Hills Circle; 2) AMC 21.08.040A.1. to allow the Holtan Hills Circle to be encompassed in a 50-foot private access tract; and 3) AMC 21.08.030F.6. to allow the maximum cul-de-sac length to be 670 feet.

Comments:

Tract 1B which is intended to contain the proposed private street includes a horizontal curve with a centerline radius of 75-feet. The minimum horizontal curve centerline radius required by the MOA Design Criteria Manual for a local street (public or private) is 150-feet. If Tract 1B were platted as proposed a variance would be required to construct the private street in the tract.

Recommendation:

No objection to the Conditional Use for a Development Master Plan subject to the following conditions:

- Revise centerline horizontal curve radius in Tract 1B to a minimum of 150-feet.

MEMORANDUM

Comments to Preliminary Plat Applications/Petitions

DATE: December 4, 2025

TO: Shawn Odell, Senior Planner

FROM: Paul LaFrance, Private Development Engineer

SUBJECT: Comments for Platting Authority
Case # S12867 – Holtan Hills Subdivision

Case No. S12867: Request to subdivide one (1) tract of land into thirty-nine (39) lots and two (2) new tracts; and request for three (3) Subdivision Variances seeking relief from: 1) AMC 21.08.030L.1. to allow the proposed upper nine (9) lots in Block 3 to have frontage on Holtan Hills Circle; 2) AMC 21.08.040A.1. to allow the Holtan Hills Circle to be encompassed in a 50-foot private access tract; and 3) AMC 21.08.030F.6. to allow the maximum cul-de-sac length to be 670 feet.

Legal Description: Tract 1, Holtan Hills Subdivision (Plat 2024-18)

Roads: The proposed subdivision will be accessed off Hightower Road (80-foot right of way width) and the newly constructed Holtan Hills Drive (60-foot public use easement).

Peripheral and Access Improvements:

No improvements to Hightower Road or Holtan Hills Drive are recommended.

Subdivision Agreement:

Petitioner shall enter into a Subdivision Agreement for the required road, path, drainage, and lighting improvements.

Dedication/Easements/Other:

- 1) Dedicate 60-feet of right of way for the proposed Holtan Hills Road and a 50-foot-radius temporary turnaround at the northeast end of Holtan Hills Road.
- 2) Designate Tract 1B as a private access tract comprised of a 50-foot-wide corridor for Holtan Hills Circle and a 50-foot-radius bulb for the cul-de-sac.
- 3) Designate Tract 1A as an open space tract (Area=86,431 SF).
- 4) Dedicate 25' trail easement on each side of the Iditarod Trail, for Lots 1 through 11, as applicable.

Road, Path, and Drainage Improvements:

- 1) In accordance with 21.09.070.F.5, Holtan Hills Road shall be constructed as a 20 to 22-foot-wide strip paved road, with 3.5 to 5-foot shoulders, and ditches (or as otherwise approved to match the approach road (Holtan Hills Drive)) on both sides of the roadway.
- 2) In accordance with 21.09.070.F.5, Holtan Hills Circle shall be constructed as a 20 to 22-foot-wide strip paved road, with 3.5 to 5-foot shoulders, and ditches on both sides of the roadway with 39.5-foot radius cul-de-sac.
- 3) In accordance with 21.09.070.F.5.d, provide an 8-foot-wide pedestrian path/bikeway on at least one side of Holtan Hills Road.
- 4) Provide streetlighting in accordance with 21.09.070.G.
- 5) Relocate the existing Iditarod Trail on Lots 4-10 to the southeast lot borders. Trail shall be constructed to the standards approved by HLB, the Girdwood Trails Committee, and other affected stakeholders.

Advisory Comment:

- 1) The plat shows two curves (75' & 150') on Holtan Hills Circle. The minimum horizontal curve radius is 150 feet per Table 1-9 of the DCM. Horizontal curves less than 150-foot radius will require variance approval from the Municipal Engineer.

Requested Variances:

- 1) AMC 21.08.030L.1 (Lot Frontage) to allow the proposed upper nine lots in Block 3 to have frontage on Holtan Hills Circle. **Private Development does not object to this variance.**
- 2) AMC 21.08.040A.1 (Street Dedication) to allow Holtan Hills Circle to be encompassed in a 50-foot private access tract. **Private Development does not object to this variance.**
- 3) AMC 21.08.030F.6 (Cul-de-sac length) to allow the maximum cul-de-sac length to be 670 feet. **Private Development does not object to this variance.**

Plat Notes (Include the following):

- a. The property owner and utilities shall not raise, lower, or re-grade the property in a manner that will alter the drainage patterns from those shown on the approved grading and drainage plan without prior approval from the Municipality of Anchorage Building Safety Officer.
- b. Property owners and utilities shall not obstruct, impede or alter approved drainage facilities (e.g. swales, ditches) in any way that will adversely impact adjacent properties or rights of way.
- c. Holtan Hills Circle is a private street, and therefore not eligible for Municipality of Anchorage maintenance.

Department Recommendations:

Private Development does not object to the proposed subdivision nor the variances seeking relief from AMC 21.08.030L.1 (Lot Frontage), AMC 21.08.040A.1 (Street Dedication), and AMC 21.08.030F.6 (Cul-de-sac length) subject to the above recommendations.



November 25, 2025

Elizabeth Appleby, Current Planning Manager
MOA, Community Development Department
Planning Division
P.O. Box 196650
Anchorage, Alaska 99519-6650

[Sent Electronically]

Re: MOA Plat Review

Dear Ms. Appleby:

The Alaska Department of Transportation and Public Facilities (DOT&PF) has reviewed the following plats and has the following comments:

- **S12865 – Proposed Tract B1- B6 Girdwood Industrial Park Ruane Rd (Girdwood)**
 - No objections to the proposed subdivision.
 - No direct vehicular access to Alyeska Highway will be permitted from proposed Tract B-6 (remainder).

- **S12866 – Proposed Tracts 18-B1, 18-B2, and 18-B3 Orca Mountain Subdivision Ruane Road / Alyeska Hwy (Girdwood)**
 - No objection to the proposed subdivision.
 - Require plat note stating: No direct access from proposed Tract 18-B2 to Alyeska Highway will be permitted. Access must be taken from Ruane Road.
 - Subsequent subdivision and development for proposed Tract 18-B2 should be designed with internal circulation in such a way that does not necessitate access to Alyeska Highway.

- **S12867 – Holton Hills Phase 1 -Tract 1 Subdivision**
 - No objection to the proposed subdivision.
 - DOT&PF recommends including pedestrian facilities on all internal subdivision streets.

- DOT&PF recommends at a minimum pedestrian level lighting for all subdivision streets and intersections.
- DOT&PF recommends direct pedestrian access via easement between parcels on Holten Hills Circle to Holten Hills Road to facilitate non-motorized connectivity within the subdivision and allow for a safe route to Girdwood Elementary. Recommend a public use easement (PUE) and trail be installed between lots 3 and 3, Block 3 and lots 4 and 5, Block 1.
- Applicant should expect a Traffic Impact Analysis (TIA) will be necessary when developing Tract 2 and connecting Holton Hills Road to Crow Creek Road that includes analysis for the full subdivision (all phases) build out.

All properties accessing DOT&PF roads must apply to Right-of-Way for a driveway permit, subject to provisions listed in 17 AAC 10.020. Any previously issued driveway permits become invalid once the property undergoes a platting action and must be reissued.

We recommend the petitioner verify all section line easements and DOT&PF road rights-of-way adjacent to their property. For assistance, the petitioner may contact the Engineering group within the Right of Way section in DOT&PF at (907) 269-0700. The petitioner is liable to remove any improvements within the easements and rights-of-way that impede the operation and maintenance of those facilities even if they are not shown on the plat, so it is in the petitioner's best interest to identify the exact locations and widths of any such easements or rights-of-way before they improve the property.

If any section line easements or road rights-of-way exist within the bounds of their plat, we recommend the petitioner dedicate them. If there is an existing right-of-way or easement, the petitioner is unable to develop that portion of the property yet continues to pay property taxes on it; dedicating will remove that cost to the petitioner.

If there are any questions regarding these comments please feel free to contact me at (907) 269-0522 or mark.eisenman@alaska.gov.

Sincerely,



Mark Eisenman
Anchorage Area Planner, DOT&PF

cc:

Sean Baski, P.E., Highway Design Group Chief, DOT&PF
Gabe Kutcher, Acting Property Management Supervisor CR, Right of Way, DOT&PF
Corliss Kimmel, Office Associate, Current Planning, MOA
Lori Blake, Office Associate, Current Planning, MOA
Devki Rearden, Engineering Associate, DOT&PF
Anna Bosin P.E., Traffic & Safety Engineer, DOT&PF



ENSTAR Natural Gas Company, LLC

Engineering Department, Right of Way Section
401 E. International Airport Road
P. O. Box 190288
Anchorage, Alaska 99519-0288
(907) 277-5551
FAX (907) 334-7798

November 24, 2025

Municipality of Anchorage, Planning Division
PO Box 196650
Anchorage, AK 99519-7943

To whom it may concern:

ENSTAR Natural Gas Company has reviewed the following preliminary plat and has no comments or recommendations.

- **HOLTAN HILLS PHASE 1**
MOA Case # S12867

If you have any questions, please feel free to contact me at 334-7944 or by email at james.christopher@enstarnaturalgas.com.

Sincerely,

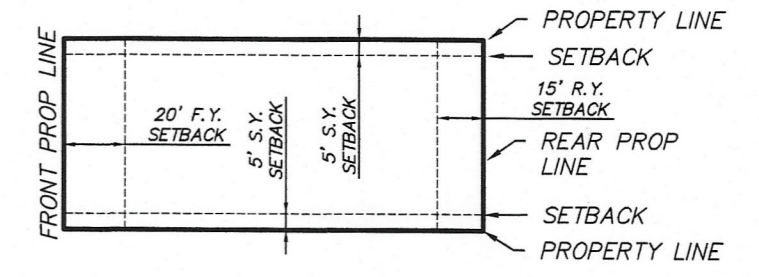
A handwritten signature in cursive script that reads "James Christopher".

James Christopher
Right of Way & Permitting Agent
ENSTAR Natural Gas Company, LLC

HOLTAN HILLS SUBDIVISION TRACT 5

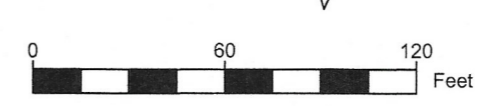
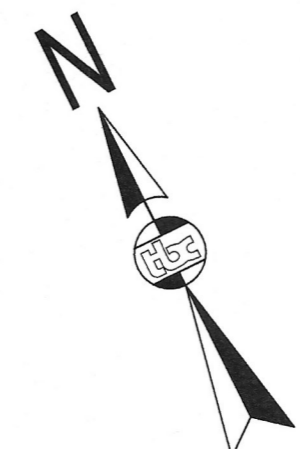
- NOTES:
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 2. THE EXISTING IDITAROD TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-9). THE IDITAROD TRAIL IS SUBJECT TO A 25' TRAIL EASEMENT ON EACH SIDE, AS APPLICABLE, TO BE DEDICATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. SURVEY WILL BE PERFORMED AFTER FIELD MARKING AND INVESTIGATION BY AWWU. ADDITIONALLY, THE 2011 AWWU ASBUILT OF THE WATER LINE INDICATES THAT THE MANHOLE LOCATIONS OF THE PROPOSED SEWER LINE SHOWN WERE BLASTED INTO THE BEDROCK AT THE TIME OF THE WATER INSTALLATION. FIELD GEOTECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
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LOT SETBACK EXAMPLE



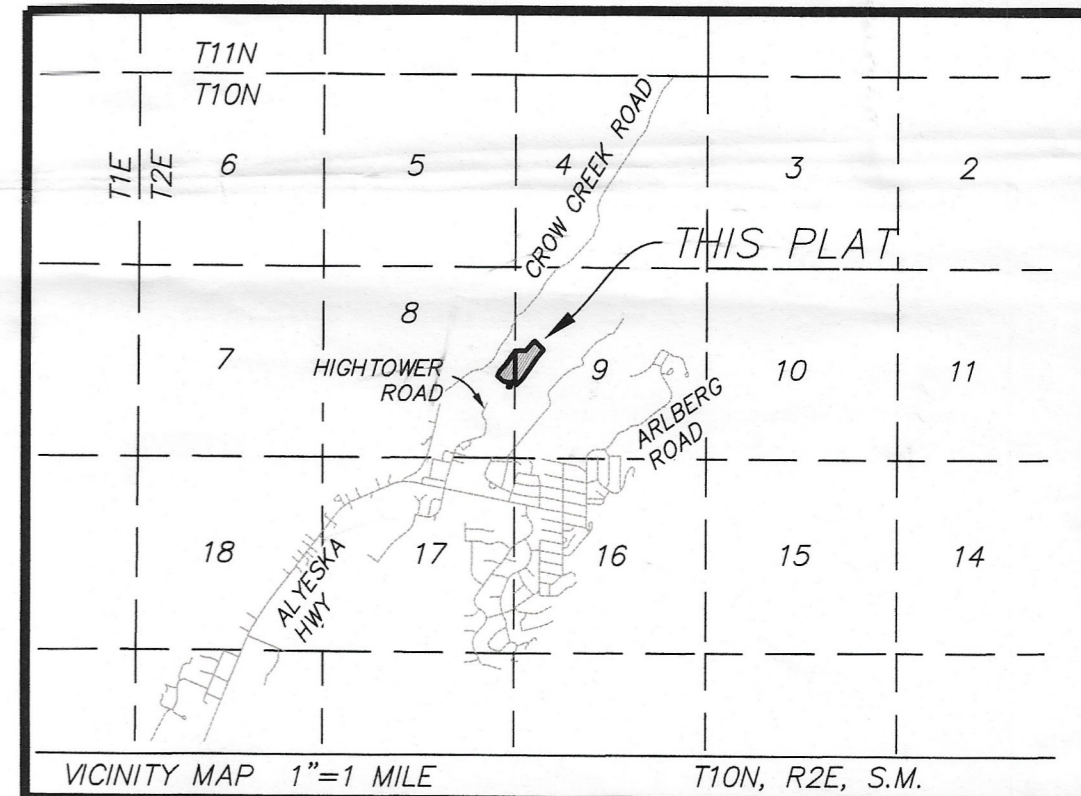
LEGEND

- GR-3 EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- WL EXISTING AWWU WATER LINE
- 102 EXISTING CONTOUR (2' INTERVAL)
- SLOPE DRAINAGE SLOPE
- SS PLANNED SEWER ALIGNMENT (SEE NOTE 3)
- D.T.P. DEDICATED THIS PLAT
- PROPOSED PAVED ROAD



TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
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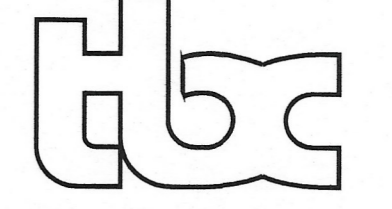
Zoning: GR-3,GOS and GIP



PRELIM PLAT
**HOLTAN HILLS
 PHASE 1**

LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B
 A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
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GRIDS:
 SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=60'
 DRAWN BY: TH
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MOA CASE No.: N/A



The Boutet Co.
 601 East 57th Place, Suite 9102
 Anchorage Alaska, 99518
 PHONE (907) 522-8778 FAX (907) 522-8779
 License No. AECC957 - thoffman@tbcoak.com

S 12867 JAN 05 2026

HOLTAN HILLS SUBDIVISION TRACT 5

HOLTAN HILLS SUBDIVISION TRACT 4

ACS

ALL EASEMENTS COVERING TELEPHONE & ELECTRICAL SHOULD READ 'COMMUNICATIONS SYSTEMS & ELECTRICAL EASEMENTS.'

PLAT APPROVED AS: **SHOWN** **CORRECTED**

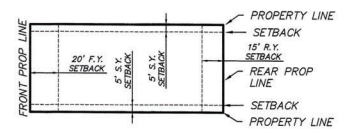
SIGN Sean Powers DATE 11/24/2025

ACR# 615,4616,4715,4716 \$# 12867

SEND LETTER OF INQUIRY

- NOTES:
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 2. THE EXISTING IDITAROD TRAIL WILL BE RELOCATED IN THOSE AREAS INDICATED (LOTS 4-9). THE IDITAROD TRAIL IS SUBJECT TO A 25' TRAIL EASEMENT ON EACH SIDE, AS APPLICABLE, TO BE DEDICATED THIS PLAT.
 3. THE LOCATION OF THE PLANNED SEWER INSTALLATION WILL NOT BE DETERMINED UNTIL THE PRECISE LOCATION OF THE EXISTING WATER LINE CAN BE SURVEYED. SURVEY WILL BE PERFORMED AFTER FIELD MARKING AND INVESTIGATION BY AWWJ. ADDITIONALLY, THE 2011 AWWJ ASBUILT OF THE WATER LINE INDICATES THAT THE MANHOLE LOCATIONS OF THE PROPOSED SEWER LINE SHOWN WERE BLASTED INTO THE BEDROCK AT THE TIME OF THE WATER INSTALLATION. FIELD GEOTECHNICAL INVESTIGATION IS REQUIRED TO VERIFY THAT ASSUMPTION.
 4. THE DRAINAGEWAYS ARE SUBJECT TO A 10' SETBACK (AMC 21.07.020 TABLE 21.07-1).
 5. TRACT 1B IS A PRIVATE ACCESS TRACT
 6. TRACT 1A IS AN OPEN SPACE TRACT

LOT SETBACK EXAMPLE

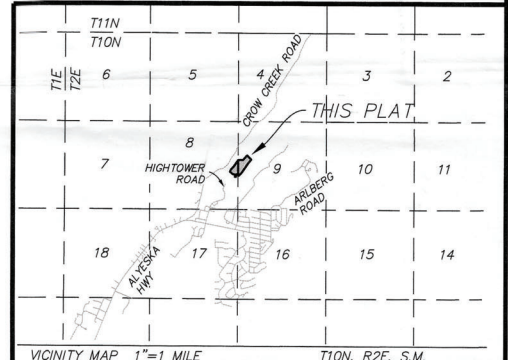


LEGEND

- GR-3 EXISTING ZONING LINE/DESIGNATION
- MAPPED WETLANDS
- MAPPED STREAMS
- WL EXISTING AWWJ WATER LINE
- 102 EXISTING CONTOUR (2' INTERVAL)
- SLOPE DRAINAGE SLOPE
- SS PLANNED SEWER ALIGNMENT (SEE NOTE 3)
- D.T.P. DEDICATED THIS PLAT
- PROPOSED PAVED ROAD

TRACT 1 SLOPE STATISTICS
 Avg. Slope = 16.46%
 Int. = 5 Feet
 L = 23086 Feet
 Area = 16.13 Acres

Zoning: GR-3, GOS and GIP



**PRELIM PLAT
 HOLTAN HILLS
 PHASE 1**

LOTS 1-19, BLOCK 1, LOTS 1-11, BLOCK 2, LOTS 1-9, BLOCK 3 and TRACTS 1A and 1B

A SUBDIVISION OF TRACT 1, HOLTAN HILLS SUBDIVISION, (PLAT 2024-18) ANCHORAGE RECORDING DISTRICT, THIRD JUDICIAL DISTRICT, STATE OF ALASKA.
 CREATING 39 LOTS AND 2 TRACTS
 LOCATED IN THE SW 1/4, E 1/2 SECTION 4; E 1/2, SECTION 8 AND SECTION 9, T10N, R2E, SEWARD MERIDIAN, ALASKA.
 CONTAINING 16.134 ACRES, MORE OR LESS.

GRIDS: SE4715, SE4716, SE4615, SE4616
 SCALE: 1"=60'
 DRAWN BY: TH
 CHECKED BY: CY
 FB/PAGE:
 DATE: 10/22/25
 MOA CASE No.: N/A

The Boutet Co.

601 East 57th Place, Suite #102
 Anchorage Alaska, 99518
 PHONE (907) 522-6776 FAX (907) 522-6779
 License No. AEC0957 - thoffman@tbcoak.com

S 12867 JAN 05 2026

S-12867, Holtan Hills Phase 1, Lots 1-19, Blk 1; Lots 1-11, Blk 2; Lots 1-9, Blk 3; Tracts 1A & 1B

- a. In the platted area:
 - i. Change street name type. Proposed street configuration for “Holton Hills Rd” is such that it would be better identified as “Holton Hills Drive.”
 - ii. Change street name. Proposed street name of “Holton Hills Circle” is not unique and will need its own new unique street name to differentiate it from “Holton Hills Drive.”

Regards,

Todd Burns
MOA Addressing
907.343.8244

Attachment 4.

Iditarod Trail Background

Case S12867

MUNICIPALITY OF ANCHORAGE



Heritage Land Bank

907-343-4333

Mayor Dan Sullivan

February 11, 2010

Survey Unit, Realty Services Section
Division of Mining, Land & Water
Department of Natural Resources
550 W. 7th Ave., Suite 650
Anchorage, AK. 99501

RE: EV-3-112 - Proposed Holtan Hills Subdivision Public Easement Vacation, Girdwood, Alaska

Dear Sir or Madam:

The Heritage Land Bank (HLB), in its capacity as the managers of uncommitted lands for the Municipality of Anchorage, is currently directing a preliminary plat effort through our consultant, R&M Consultants, Inc., for the subdivision of a large parcel of land located in Girdwood, Alaska. The proposed plat of Holtan Hills Subdivision will be a subdivision of Tract B, Girdwood Elementary School Subdivision, Plat No. 85-38; Tract 9-A, Supplemental Cadastral Survey of Township 10 North, Range 2 East, Seward Meridian, Alaska, Plat No. 73-220; Tract I, Alyeska Subdivision, Prince Addition, Plat No. 87-131. The preliminary plat is currently being reviewed by the Municipality of Anchorage Planning Department under Case No. S-11650-2.

Heritage Land Bank would like to request the vacation of a portion of the existing Public Easement that is formed by a 200 foot offset from the west Ordinary High Water Mark of Glacier Creek in Girdwood, Alaska. Specifically, the HLB would like to vacate only that portion of the 200 foot easement that falls within Blocks 1, 2, and 3 of the proposed subdivision. The larger portion of the easement would remain intact for continued access by the public.

History and Access

The described property is owned by the Municipality of Anchorage, and managed by the Heritage Land Bank. Legal access in the area is provided by existing and proposed dedicated rights of way and trail corridors. Historically, physical access throughout this area has been by the Historic Iditarod Trail, and more recently by the existing Crow Creek Road. The Crow Creek Road was constructed by the Alaska Road Commission in 1911, and improved in 1922. The road generally followed the Historic Iditarod Trail through the valley. In 1997 a cooperative planning effort between the Municipality of Anchorage, the National Park Service, the Department of Natural Resources, the Girdwood Board of Supervisors, the Bureau of Land Management, and various other agencies and committees, studied the history of the Iditarod Trail in an effort to protect and improve the trail through the Girdwood valley. The result of this planning effort was a published report called the Girdwood-Iditarod Trail Route Study, which was adopted by the Anchorage Municipal Assembly on May 20, 1997 as AR 97-84. The study concluded that the location of the Historic Iditarod Trail generally followed the current location of the Crow Creek Road, and suggested that a series of new trails be built that would tie in

to the Historic Iditarod Trail, but follow a more wooded and scenic route. One portion of this Girdwood-Iditarod Trail construction was through the Proposed Holtan Hills Subdivision from the Girdwood School, north to Crow Creek Road. The Girdwood-Iditarod Trail through this area was constructed in the mid-1990's, and is not located on the original historic route of the Iditarod Trail. This portion of the trail is not subject to RS2477 requirements since it is not an original historic trail, however, the proposed platting action will also propose the dedication of a 50 foot wide trail easement roughly centered on the existing location of the Girdwood-Iditarod Trail for that portion that falls within the subdivision. The easement will ensure that the public continues to have an access corridor through the area.

Other trails exist within the area which also provide access through the area. These trails, such as the Tiny Creek Trail, the Winner Creek Trail, and the Athabaskan Loop Trail, were also built in the recent past, and have no historical basis for their location or use. The creeks within the area are also protected by 25 foot Stream Maintenance Easements. These easements are a requirement of the Municipality of Anchorage for protection of creeks and streams, and are not intended for access by the public.

The subject 200 foot Public Easement falls within existing Tract I, Alyeska Subdivision, Prince Addn., Plat No. 87-131. Tract I was created from Tract B, ASLS 81-149, Plat No. 84-446. Note 14 on the face of ASLS 81-149 creates a 200 foot public easement along both sides of Glacier Creek, as measured from the ordinary high water mark, for the purpose of providing the public with access along the creek. State Patent No. 8134 transfers ownership of Tracts A and B, ASLS 81-149, to the Municipality of Anchorage subject to platted easements and reservations.

Justification for vacating Section Line Easement

Currently, the 200 foot Public Easement encroaches on portions of the Proposed Holtan Hills Subdivision, rendering some lots unusable. The placement and configuration of these individual lots was based on the Municipality's subdivision code in Title 21.09, Girdwood Land Use Regulations. The design criteria in these regulations stipulate that development will occur in a manner that maintains the appearance and character of the valley. More specifically, there must be 30% vegetation retention on each lot, average slopes must be less than 35%, and setbacks from the front, rear, and side lot lines must be maintained. This subdivision is located in an area of wetlands mixed with stands of old-growth forest. Lots were designed around wetlands areas and natural drainages to avoid disruption of the natural flow of ground water through the site. Steep terrain throughout the site further limits the placement of structures and driveways. Designing subdivision lots on a site with such challenging topography, when coupled with the stringent requirements of local codes, requires careful consideration. The lots, as designed, have very little room for movement or reconfiguration. Therefore, we feel that the most prudent and reasonable approach would be to vacate a portion of the 200 foot easement, leaving ample room for public access while moving the easement out of the proposed subdivision.

Please see the attached exhibits which show alternate access and the limits of this vacation request. Thank you for considering our request.

Sincerely,



William M. Mehner
Executive Director