

# Municipality of Anchorage



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**David Bronson, Mayor**

**GIRDWOOD VALLEY SERVICE AREA BOARD OF SUPERVISORS**

*Briana Sullivan & Jennifer Wingard, Co-Chairs  
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June 2, 2023

Attn: Ryan Anderson, AK DOT&PF Commissioner: [dot.commissioner@alaska.gov](mailto:dot.commissioner@alaska.gov)  
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Re: ADA-09547 Proposal to Lease State Airport Land at Girdwood Airport

Dear DOT Aviation Leasing

The Girdwood Board of Supervisors (GBOS) is the elected local government body which formally represents the community of Girdwood and oversees the operation of the Girdwood Valley Service Area (GVSA).

GBOS has listened to multiple community members' questions and concerns about the proposed lease of 11 acres of land at Girdwood Airport for a lodge and associated development. We also heard from the applicants, who have committed to engaging with GBOS and the community throughout the development process. We welcome the ongoing communication with the development team. Girdwood is also actively updating its Comprehensive Plan so it is an opportune moment for consideration of large projects such as this.

On May 5th, 2023, the Alaska Department of Transportation and Public Facilities (DOT&PF) published a public notice inviting Public Comment on the above proposed lease at Girdwood Airport.

The following information was provided in the Public Notice about the proposed lease, along with a general location map of the proposed facilities. In a follow-up conversation with DOT&PF Aviation Leasing, it was explained that DOT&PF would not release any further information until after the public comment period was closed.

The Alaska Department of Transportation & Public Facilities proposes to lease approximately eleven acres (ADA-09547), at Girdwood Airport for 55 years. Applicant: Glacier Valley Lodge, LLC. Annual rent: \$48,830.76. Authorized uses: Mixed Aeronautical and Non-aeronautical - up to 150 short term lodging units, private aircraft storage, fueling, and maintenance. Ancillary facilities for a winter/summer sports center, fly out base, meeting space, and food and beverage service along with ten 600 square foot residences for employees in the upper two floors of the Ancillary facility.

We note that the information provided in the Public Notice is very limited, and therefore inadequate to provide comprehensive public input. Regardless, we offer the following comments.

**1) The proposal is not a permitted use under adopted Girdwood Airport Zoning**

Anchorage Municipal Code Title 21, Chapter 9 contains the Land Use code for Girdwood. The Airport is zoned “GA”, and the set of allowable uses are listed in Table 21.09-2 under AMC 21.09.050. Aviation uses such as aircraft repair, storage and maintenance are permitted, some with additional procedural steps. However, the proposal includes substantial non-aviation uses including a large hotel/lodge, meeting space, residences, and sports center. These are all non-permitted uses in Girdwood Land Use code.

We acknowledge that DOT&PF have previously asserted an interpretation of statute and regulations that any development on state airport land is outside the land use jurisdiction of a Municipality. The correctness of this assertion is outside the scope of our comments.

Notwithstanding DOT&PF’s previous position, the land in question has been provided specific zoning under Anchorage Municipal Code to allow aviation use while protecting broader community interests. Quoting AMC 21.09.040 F

*2. GA (Girdwood Airport) district.*

*a. Location.* The GA district consists of State of Alaska-owned property where the Girdwood airport is currently located. The airport property is located north of Alyeska Highway and straddles Glacier Creek. The airport facility itself is on the east side of Glacier Creek, but much of the airport property is either wetlands or river floodway

*b. Intent.* The intent of this district is for continuation of uses that are primarily aviation related, but also for wetlands and river floodway to be minimally disturbed by development within this district.

**2) The proposal is not primarily aviation related**

Girdwood Airport is suitable for small, single-engine aircraft and due to configuration and surrounding terrain, is unlikely to see larger traffic. Transient aircraft mostly originate from nearby airports in SouthCentral Alaska, so the demand for lodging and related services is very low from fly-in visitors. The demand for the proposed lodge will primarily, and arguably almost exclusively, come from visitors arriving by road. A substantial majority of the economic activity and site usage appears to be for road-access visitor accommodations, so the proposal would neither meet the letter of current zoning, nor the broad intent of being primarily for aviation use.

### **3) Inadequate road access to the site - requirement for Traffic Impact Analysis and recommended mitigation measures**

The only road access to Girdwood Airport is via underdeveloped local neighborhood roads. Almost all traffic accesses the airport via sections of Davos Road and part of Mount Hood Drive, both of which are under Municipal management through GVSA, until becoming State-managed road at the airport parcel boundary.

Considering the current commercial uses of flightseeing and seasonal heli-skiing, Mount Hood Drive experiences substantially more traffic than was anticipated when it was originally built. The proposal, at full scale, would generate a large amount of additional traffic - likely over 1,000 vehicle trips per day. Such large commercial development must be preceded by a full Traffic Impact Analysis and recommendations for traffic reduction and/or mitigation measures. Mitigation may include construction of an alternative road access to avoid residential areas and/or upgrades to existing roads. Costs for off-site traffic mitigation should be borne by a combination of the State as airport owner, and/or the developer, and not by Girdwood service area tax payers. If upgrades are made to Municipally managed roads, there also needs to be consideration of future maintenance costs which would be borne by GVSA.

### **4) Impact on recreational resources**

Girdwood's economy is intimately tied to its role as an outdoor recreation gateway community. Developments at current grade above the airport would significantly impact the viewshed and recreational experience on Moose Meadows, a Class A wetland and dedicated Municipal park. Once adequate snowpack is established, Moose Meadows sees continual use through the winter as a multi-use trail, while its primary use in summer is a wildlife corridor. Even if the facilities were constructed at airport grade, their rooflines and possibly upper stories would negatively affect the viewshed. Light and noise pollution from the development would alter both human and wildlife experience of Moose Meadows Park. The entire area is a special place and the wetlands are particularly susceptible to disturbance from nearby construction.

This proposal could also provide improvement to needed trail connectivity in the vicinity of the airport. There have been long-running conflicts over access on, and adjacent to, airport land, so both the community and airport management have a mutual interest in reducing conflict and maintaining safety within aircraft movement areas.

### **5) Impact on existing aviation use**

The 2005 Girdwood Airport Master Plan and subsequent Airport Layout Plans show development of additional aviation facilities continuing to the northeast of the existing facilities - a pattern which was followed by the recent hangar development. We have heard from multiple airport users that a lack of aircraft parking, especially tie-downs for visiting aircraft is the most pressing problem. However, this proposal devotes a significant amount of land to non-aviation uses in place of needed space for tie-downs and additional lease lots for hangars.

### **6) Impact on community housing**

GBOS appreciates the addition of employee accommodation in any commercial development and welcomes the proposed 10 units of employee housing in the project. However, a 150-room hotel providing lodge-like accommodation with food and beverage services would be expected to have a large staff of 100 or higher. Even considering the inclusion of 10 housing units, a development of this size

would place additional burdens on an already unsustainably constricted local housing stock. We recommend construction of employee housing from the earliest stages of the project with housing complete before the facility becomes operational.

### **7) Drainage and lessons from the recent hangar development at Girdwood Airport**

The construction of the new hangar at 730 Mt Hood Drive illustrated several problems which we also anticipate for this project. Excavating the hillside down to airport grade and the removal of material required a continual stream of trucks every day for two summer construction seasons. This accelerated damage to local access roads as well as caused sustained nuisance and safety risks to local residents. Increased daytime noise and traffic impacts were felt throughout the Girdwood valley. This proposal could require double or more volume of material removed during the previous hangar construction. Furthermore, the removed material proved unsuitable for use as fill for other local projects, so there was no counterbalancing benefit to the community.

The hangar development has also caused ongoing problems with area drainage. There is evidence of erosion on the steep slopes around the hangar, and the drainage pattern directs water and eroded material toward and through the residential area to the south. This proposal should be required to direct runoff to the north and northwest draining directly to Glacier Creek rather than the residential neighborhood to the south. Appropriate measures should be taken to avoid erosion both within the project boundary and to surrounding land.

### **Deadline for Competing Applications and Reopening of Public Comment**

GBOS supports maintaining the deadline for Competing Applications as 4:30pm on June 12th 2023. GBOS requests that public comment be reopened after June 12th to allow qualified potential lessees to provide additional details to Girdwood community about their proposal(s).

### **Conclusion**

Many more questions and concerns were raised that relate to the applicant's potential design, building, and operation phases. These would usually be addressed during the further planning and permitting process when more detailed information has been developed by the applicants. GBOS appreciates the outreach from the development team and we look forward to their continued public engagement.

While the concept of an additional large hotel/lodge in Girdwood likely does meet the needs of projected visitor growth, there are substantial challenges with the proposed location at Girdwood Airport as described in our points above.

Since so little information has been made public at this point, GBOS is not able to support or object to the proposal in its current outline form.



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