

Municipality of Anchorage



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David Bronson, Mayor

GIRDWOOD VALLEY SERVICE AREA BOARD OF SUPERVISORS

*Mike Edgington & Briana Sullivan, Co-Chairs
Jennifer Wingard, Amanda Sassi, Guy Wade*

Via Email: wwwhlb@anchorageak.gov

April 7, 2022

Dear HLB Staff,

Re: GBOS initial comments on the draft 2022 Heritage Land Bank Annual Work Program & 5-Year Management Plan

The Girdwood Board of Supervisors (GBOS) is the duly elected Anchorage municipal board representing the residents and tax payers of Girdwood Valley Service Area in the provision of multiple local services, including Parks and Recreation, and is also recognized under AMC 22.40.035 as representing Girdwood in an equivalent capacity as a Community Council.

The Heritage Land Bank (HLB) is the largest land owner within the Girdwood Valley Service Area, and GBOS appreciates the close working relationship forged between the two bodies over the years on multiple critical projects, while recognizing that each entity has a distinct role within the broader Municipality. Specifically, GBOS represents the community of Girdwood whereas HLB has responsibility to the interests of citizens across the whole Municipality and to its own financial interests as a non-tax funded body.

This letter includes GBOS's initial comments to be included in Appendix G of the Work Plan ahead of consideration at the HLB Advisory Commission meeting of April 28th. It represents the outcome of detailed consideration of the HLB work plan at GBOS work sessions on March 16th, 2022 and March 29th, 2022 and a GBOS Special Meeting of April 5th, 2022 where the board voted 4 in favor and 1 against to provide these comments. GBOS may have additional comments to be presented later in the process before Assembly action.

The most important current HLB initiative within Girdwood is the Holtan Hills development, so we will address this first.

Holtan Hills

HLB's own procedures recognize the need for a land use study before any major development or disposal. There has been no such land use study for this specific Holtan Hills proposal nor any land use study in the past decade for development of the Crow Creek neighborhood. GBOS strongly recommends that an updated land use study be performed which also reflects recent changes to housing market. This study should include impacts on workforce housing if this project goes forward.

GBOS also has a fundamental concern that the basis for the original RFP was to provide residential housing that met the needs of the Girdwood community, yet the project as currently proposed is for Land Developmental alone, with no

specific linkage to residential housing. Specifically, there is no public information on how any resultant housing would meet the needs of current and future Girdwood residents rather than non-resident second homeowners.

Community members have also expressed concern about maintaining trail buffers and the character of the trails that are adjacent to the development.

General comments

GBOS was concerned by several sections of the document which raise a question about HLB's acceptance of the outcome of the Girdwood public process or a lack of intent to respect plans emerging from the community.

Specifically:

- Closure of HLB land (p17). While GBOS acknowledges that HLB, as the landowner of record, has the right to close land as they see fit, almost all land HLB holds in Girdwood is part of the broader natural recreational resources of the community. A narrow assertion of HLB "ownership" and the threat of land closure is in conflict with both the goal of managing land as an asset to the wider community and a threat to the basic economic driver of Girdwood as a recreational community. This is perhaps a timely reminder that either an open public access agreement should be reached for the bulk of HLB land in Girdwood, or a transfer to a Municipal entity that has expertise and focus on recreational land management.
- Girdwood Trails and Natural Space Plan (p17). The plan indicates that HLB has "grave concerns about some of the proposed projects" and "will provide a detailed Staff Report to HLBAC". There was an opportunity for formal feedback during the Public Comment period on the earlier draft plan and that opportunity will be provided again in any future draft plans. We encourage HLB staff to productively engage in the *development* of the plan through the public process.
- *"Natural spaces have been removed from the plan. HLB will pursue Natural Space Plans for conservation areas on HLB lands separately."* (p17)
This language reads as if HLB intends to ignore future formal plans from the community. There is currently no locally adopted plan, only a version being drafted and, as described above, there will be future opportunity for public comment before local acceptance. Further, as a Municipal entity, HLB has the additional privilege of providing a Staff response during the process of formal Municipal plan adoption.
- HLB Signage Plan (p17) This section as written appears dismissive of Girdwood's broader interests in adopting a coherent and cohesive look-and-feel to the recreational trail facilities across the community.

Other HLB Management Priorities

GBOS especially welcomes the following commitments from HLB:

- *"Enhance community trust and support for HLB functions and activities by ensuring a **transparent, accountable process for proposals**, and carefully documenting the decision-making process with **timely and proper outreach and notice.**"* (p18)

Unfortunately, many members of the public have become suspicious of HLB's motives due to certain actions over the past couple of years which appear to disregard those who are impacted most. We welcome a commitment to greater transparency and accountability, and urge this to include permit actions as well as land disposals.

- ***“Position HLB lands in Girdwood in a manner consistent with community-based, adopted plans and HLB goals for development and conservation.”*** (p19)
GBOS supports this priority, although it does appear to be in conflict with some of the specific comments in the previous sections. We welcome a clear commitment to consistency with all community-based, adopted plans.
- ***“Periodically review and consult with municipal agencies and community councils to determine their need for HLB land to fulfill municipal purposes. When a municipal agency is in need of HLB land, that agency may submit an application, which will then be processed to a final decision.”*** (p19)
As described above, much of the HLB land in Girdwood is critical to the recreational resources – both formal and informal – that form the existential environmental context of the community. As such, HLB should proactively review their own inventory, and where the only practical use of Girdwood land is in its recreational utility, consider conveyance to other Municipal departments which specialize in recreational land management.

GBOS has concerns, similar to those described earlier about the following stated priority:

“As future projects in the Girdwood Valley develop that could negatively impact primitive open space, periodically review and consult with Municipal agencies and the Girdwood Community to assess potential impacts and ways to mitigate those identified.” (p19). The language of this priority, especially the language highlighted in the HLB work plan and reproduced exactly here, could easily be perceived as being provocative, adopting similar terminology which was removed from an earlier draft of the Girdwood Trails Plan. While this may be entirely coincidental, it further undermines the community’s trust that HLB respects Girdwood’s public process and will follow *“community-based, adopted plans”*.

Trespass remediation

GBOS acknowledges that HLB land has been damaged by unauthorized use of machines and supports HLB’s efforts to prevent additional damage. However, we would urge those efforts to have minimal visual impact, so use of natural rocks etc. would be preferable to visually intrusive approaches such as high fencing.

Thank you for consideration of these specific comments and we look forward to providing additional responses as the HLB Work Plan moves towards Assembly adoption.

Briana Sullivan
Co-Chair’s, Girdwood Board of Supervisors

Mike Edgington