

# Municipality of Anchorage



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**Suzanne LaFrance, Mayor**

**GIRDWOOD VALLEY SERVICE AREA BOARD OF SUPERVISORS**

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November 17, 2025

Thank you for the extremely in-depth and comprehensive Community Wildfire Protection Plan (CWPP) release last week and this brief opportunity to comment before November 30. Our list of comments is attached.

Wildfire is a significant concern across all communities in the Wildland-Urban Interface, including Girdwood. While our detailed comments can be found in the attached table, we would like to direct your attention to two major concerns from a Girdwood perspective:

- 1) The detailed analysis used to establish the Suppression Protection Unit Hazard Ratings (SPUHR) was based on weather data from a single station in Anchorage Bowl. As the CWPP itself acknowledges on p35, Girdwood has a distinct and far wetter climate than either the Bowl or Northern Communities, with annual precipitation around 3 times higher than urban Anchorage. A widely cited recent study on wildfire occurrence risk<sup>1</sup> identified that when flammable fuel is present, wetting rain days (WRD), i.e. days with greater than 0.1" of precipitation, are the most significant predictor of wildfire occurrence probability. Weather records show that Girdwood has an average of 44% WRD during the fire season, compared to only 22% in Anchorage Bowl.

While we acknowledge that any wildfire risk analysis should be based on more extreme fire weather conditions than the average, that analysis has also not been performed. By not considering the actual climatic conditions, the hazard rating assigned to the Girdwood SPU cannot be considered reliable,

- 2) Girdwood recently completed a re-write of the Girdwood Comprehensive Plan<sup>2</sup> (GCP) which was adopted by the Anchorage Assembly in April 2025. The GCP identified multiple community values and future changes to Land Use regulations which emphasize the connection between the forested environment and residential housing. In contrast, the CWPP proposes traditional mitigation strategies such as 200-300' wide shaded fuel breaks which would be in direct opposition to the community values, goals and policies expressed in the GCP.

We urge the project team to revisit the mitigation strategies proposed for Girdwood, taking into consideration the Girdwood Comprehensive Plan and the actual on-the-ground climate, environmental and economic conditions.

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<sup>1</sup> Holden et al, "Decreasing fire season precipitation increased recent western US forest wildfire activity", Proc. Natl. Acad. Sci. U.S.A. 115 (36) E8349-E8357, (2018).


<sup>2</sup> Officially adopted Municipality of Anchorage Land Use and Comprehensive Plans, including the 2025 Girdwood Comprehensive Plan, can be found at <https://www.muni.org/Departments/OCPP/Planning/Publications/pages/default.aspx>

Notwithstanding the specific concerns above, we strongly support all the work that has gone into developing the CWPP and appreciate the close collaboration between the Wildfire Division with Girdwood Fire Department staff.

GBOS acknowledges that wildfire resilience is a community-wide effort which requires collaboration across landowners, land managers, local government, businesses and residents. Effective mitigation extends to the hands and minds of each homeowner and their actions. Citizens need to have an appreciation of the inherent wildfire risk and be informed of the range of Firewise strategies.

GBOS supports the implementation recommendation to permanently fund a sustainable AFD Wildfire Division to support homeowner assessments which in turn drive the CWPP. All objectives and recommendations of this plan entail a champion, which currently lies in our AFD and GFRD - already in action.

Sincerely,

A handwritten signature in black ink that reads "Briana Sullivan". The script is cursive and fluid.

Briana Sullivan  
GBOS Fire Supervisor

1	CWPP 35	Table 3	<p>Q: Table cites Typical Distribution for vegetation type only for White &amp; Black Spruce. Does the distribution location carry through the chart for all vegetation listed?</p> <p>Suggested edit: Include Girdwood under Typical Distribution for vegetation type Alder &amp; Willow, as our SPU encompass wetlands and bogs</p>
2	CWPP 35	<p>'While microclimates are found throughout the municipality, the most notable difference between climates is that of Girdwood compared to the remainder of the municipality. Girdwood experiences warmer winters, slightly cooler summers, and receives significantly more precipitation; it receives 45-55 inches of rainfall and 150-200 inches of snow. Conversely, the remainder of Anchorage receives 16-17 inches of rainfall and 75-80 inches of snow.'</p>	<p>Statement regarding the microclimates through the MOA and most notably Girdwood compared to rest of MOA.</p> <p>However, this information isn't reflected adequately in later analysis, hazard rating or in the mitigation information.</p> <p>Please either use the local climate information for Girdwood, or clearly state that the distinct climate of Girdwood was not taken into consideration during the Hazard Rating Rating determination or the mitigation strategies.</p>
3	CWPP 47		<p>Comment: The impressive progress made by AFD Wildfire Division in a short period of time supports the recommendation that a permanent division is imperative to the safety of all residents in Municipality. This provides evidence to support the concept that an expansion of the division can accomplish even more for those it serves. Without a stable funding stream, the division risks downsizing or disappearing altogether, which historically proves both unsuccessful and risky.</p>

4	CWPP 50	Figure 15	Comment: "Mean Wildfire Exposure" is not defined anywhere in the main document or appendices. The surrounding narrative describes the process to determine the Hazard Warning rating but does not clearly describe what this map represents.
5	CWPP 74	Figure 29	Comment: GBOS approves of the statement and GFRD service area map
6	CWPP 75-76	Fire Suppression Needs	<p>Comment: Coordination and support with GFRD goals for service and training by 2030 is supported by GBOS, however, strongly urges coordination <i>within</i> upcoming critical months and years. The AFD wildfire division shall support and coordinate with both departments during fire season. i.e. coordination on funding, training, equipment and apparatus purchases.</p> <p>GBOS further notes the staffing of GFRD with a modernized fleet of apparatus to ensure reliable and effective wildfire response within the MOA including Chugiak and Girdwood. The mention of distribution of these apparatuses between Northern and Southern MOA is evidenced and necessary.</p>
7	CWPP 79	All fire department connections, both man-made installments and natural sources should be checked annually and serviced as needed.	<p>Comment: GBOS supports statement.</p> <p>Q: Should CWPP explicitly mention who is responsible for this?</p> <p>Comment: The Turnagain Arm community dry hydrants are privately maintained.</p>
8	CWPP 82-83	Develop Robust Wildfire Division	Comment: GBOS agrees with the recommendation to develop a permanently established and municipally funded wildfire division. This program would include suppression, mitigation, planning, training, public outreach, interagency coordination, year-round. The Team would respond to all wildland fires alongside AFD, CVFRD, and GFRD to operate in unified command to provide personnel and equipment as necessary and manage or support the incident. Responsibilities listed, GBOS supports.

9	CWPP 84	Wildfire Division Roles & Responsibilities	Comment: GBOS looks forward to the public outreach of the Wildfire Division Program Manager and receiving updates from this leadership position. Further, the community would appreciate the two Wildfire Specialists' community education and training for GFRD, directly supporting and enhancing Girdwood's knowledge and resilience.
10	CWPP 90	Access and Egress Route	Comment: GBOS appreciates any interagency annual pre-incident wildfire training specifically for enhancing interagency communication and strengthening coordinated response to a sustained wildfire emergency within the MOA.
11	CWPP 90	Recommended collaboration with WUI-CAT: GBOS shall collaborate with designated representatives in the WUI-CAT to plan and conduct community-led evacuation drills. Still, it is not the responsibility of citizen groups to lead evacuation drills; this should be an MOA function.	Comment: This local strengthening of preparedness is needed for Girdwood and is most possible through AFD Wildfire Division and coordination between GFRD and community.
12	CWPP 95	Development and Training	Comment: GBOS supports training events, budgeting, cross training firefighter and emergency personnel in both structural and wildland firefighting methods and tactics in coordination with GFRD.
13	CWPP 98	Roadway treatments and Powerline	Comment: GBOS thanks CWPP for thoroughly defining the process for mitigation in identified areas. We strongly encourage coordination with utility owners and managers, as well as recognition of goals in the Girdwood Comprehensive Plan (2025).
14	CWPP 102	Vegetation Map: GBOS acknowledges the recommendation by Bintel Inc to update hazardous vegetation map - citing the presence of hazardous fuels in Girdwood, which was not thoroughly represented with respect to 'density or the moderating influence of rainfall' which projected the suggestion that fire behavior was like	Comment: If the CWPP cannot shift the Hazard Rating chart, we agree with the recommendation to accurately note the vegetation and fuel layers across the municipality, i.e. fuel type, density, and site-specific influence such as rainfall. Bintel Inc further specified improved mapping to enhance the accuracy of fire behavior modeling, resulting in better informed mitigation strategies.

		the Anchorage Bowl. Further, the Alaska Climate Research Center cites Girdwood receives four times more rainfall than the Anchorage Hillside, a factor not currently reflected in the mapping.	
15	Appendix A 48-49	SPU 20 states 'The meeting of shoreline and forest at the community's entrance creates conditions where cool, damp, and overcast weather dominate, though small changes in this sensitive environment could have detrimental wildfire effects.'	Comment: GBOS emphasizes the above data and conclusions and is curious about the Hazard Rating based on annual rainfall and climate. Further, we acknowledge the rigorous methodology and notice that the Hazard Rating cannot be modified. The possibility of a wildfire is real in severely dry conditions, of which climate warming plays an integral role. Continued climate data collection and modeling is necessary in CWPP revisions.
16	Appendix A 48-49	SPU #20 Girdwood	Comment: The recently adopted Girdwood Comprehensive Plan (2025) identifies one of the core physical environmental values of the community as the close integration of residential housing into the rain forest environment, (e.g..) For example, the proposed updates to residential zoning code emphasize minimizing disturbance to native vegetation. Care should be taken to balance the essential characteristics of the community with traditional approaches to wildfire hardening.
17	Appendix A 49	SPU #20 Girdwood	Request edit and addition: Edit: "Hydrants are limited to the townsite and developments east of Glacier Creek nearest to Alyeska Resort" and are not found on along the first 2 miles of Alyeska Highway" Addition: "In common with many tourism communities, the majority of residential homes are used as vacation homes and/or short-term rentals, which significantly increases the difficulty of communicating status in the event of a possible evacuation and may necessitate intensive door-to-door notification."

18	Appendix C		<p>Based on the Methodology description and subsequent private communication with Dr Schmidt, the Rabbit Creek RAWS data alone was used to represent weather across the entire MOA in the IFTDSS modeling for Average integrated hazard. This is a reasonable approximation for the Anchorage Bowl and Northern Communities but is a misleading source for the Girdwood climate (and to a lesser extent for other Turnagain Arm communities).</p> <p>By not considering actual climate conditions, the hazard rating assigned to the Girdwood SPU cannot be considered reliable.</p>
19	Appendix D 29	Chart 31 Re: Girdwood's changing environment present and future	Comment: Thank you
19	Appendix D 33-34	Figure 10	<p>Comment: The community of Girdwood would most likely not support the proposed mitigation of shaded fire breaks in the three locations proposed. However, if there was substantial proof of elevated risk profile in Girdwood, perhaps this could be conveyed to locals. Furthermore, without much public outreach on this topic, we cannot confirm absolutely, except to urge consultation of the 2025 Girdwood Comprehensive Plan.</p>
20	Appendix D 33	Proposed Fuel Reduction Treatments	<p>Comment re Glacier Creek: GBOS Appreciates reference to landowners and managers. Also emphasizes HLB's conclusion on proposed treatments regarding parcels 6-057F and 6-039, versus mastication. GBOS looks forward to discussing future options as noticed. Further, please see the Girdwood Trails Plan (2024), HLB 2026 Work Plan and 2027-2031 5-year Work Plan for trails, easements, utilities (i.e. ENSTAR) and parcel intentions.</p>
21	Appendix D 34	Proposed Fuel Reduction Treatments	<p>Comment re Alyeska Hwy and Crow Creek Road: GBOS Appreciates references to landowners and managers, and would suggest hand thinning in areas of steep, rough terrain wherever heavy equipment cannot operate (pg 96 CWPP). While CWPP further cites hand-thinning is not a long-term method for effective management, the forest may not include all 'dense fuel stands' and such unintended impacts would directly clash with the community's values as expressed in the Girdwood Comprehensive Plan (2025).</p>

22	Appendix D 35-36	Recommendation for water cistern in Girdwood and Upper Crow Creek	Comment: The cistern water supply for Girdwood is located in an already water hydrated area. Highlight request from Girdwood Fire Chief - selection of an area without hydrants is preferred, such as Old Girdwood. Recommendation for water cistern location in Upper Crow Creek is supported by Girdwood Fire Chief.
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References:

[Girdwood Comprehensive Plan \(2025\)](#)

[Girdwood Trails Plan \(2024\)](#)