

# Municipality of Anchorage



P.O. Box 390  
Girdwood, Alaska 99587  
<http://www.muni.org/gbos>

**David Bronson, Mayor**

GIRDWOOD VALLEY SERVICE AREA BOARD OF SUPERVISORS  
Briana Sullivan & Jennifer Wingard, Co-Chairs  
Mike Edgington, Amanda Sassi, Guy Wade

June 1, 2023

Attn: Ryan Anderson, AK DOT&PF Commissioner: [dot.commissioner@alaska.gov](mailto:dot.commissioner@alaska.gov)  
John R Binder III, AK DOT&PF Deputy Commissioner: [john.binder@alaska.gov](mailto:john.binder@alaska.gov)  
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Vickie Swain: [vickie.swain@alaska.gov](mailto:vickie.swain@alaska.gov)  
Britton Goldberg: [britton.goldberg@alaska.gov](mailto:britton.goldberg@alaska.gov)

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 will be for road-access visitor accommodations, so the proposal neither meets 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 toward Moose Meadows Creek and 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.

#### 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.

**Commented [1]:** do you mean away? or from/ then to

**Commented [2]:** \_Marked as resolved\_

**Commented [3]:** \_Re-opened\_  
This made sense



May 26, 2023

Alaska Department of Transportation & Public Facilities  
Aviation Leasing, Central Region  
P.O. Box 196900  
Anchorage, AK 99519-6900

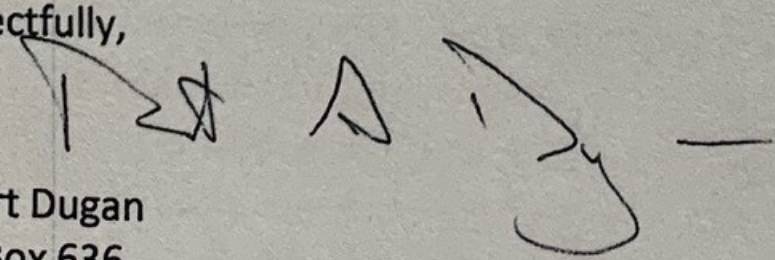
Dear Alaska DOT Aviation Leasing, Central Region (and Vickie Swain or Britton Goldberg),

I was recently made aware of ADA-09547, Proposal to Lease State Airport Land at Girdwood Airport. As a 45-year resident of Girdwood I vehemently object to this proposal. A few of my objections are:

1. The earthwork required for the building site and access road will result in months or years of an endless parade of heavy dump truck traffic through the middle of Girdwood, both to excavate the massive amounts of materials unsuitable for foundations and road building, and to haul in new gravel and materials. This was experienced recently during construction of the hangar that abuts the proposed hotel property despite being a much smaller development.
2. The access road would violate the highly used, and valued, traditional cross-country skiing and hiking trails, and wetlands north of Moose Meadow Creek.
3. The proposed development would encroach on the Moose Meadow and view-shed, which is heavily used by local residents and visitors.
4. A large facility, as proposed, is out of keeping with the general area and would be an obnoxious eyesore with huge impact. This is not the place for a big new hotel.
5. I question the propriety and legality in the use of DOT (public) property reserved for aviation purposes to build a private, giant hotel complex seemingly free of municipality restrictions, land use plans, or codes.
6. The fast-track schedule for public comment, lack of information on project details, and minimal opportunity for community involvement for such a large-scale development in such a small valley is unprecedented in Girdwood, and appalling.
7. The \$49K/year lease fee is genuinely laughable – being the equivalent of renting a 4 bedroom house on a ¼ acre lot in Girdwood for a year. Is it even subject to MOA property taxes?
8. I am certain I could provide many more objections if more information on the proposed development were made available.

For the above-mentioned objections I urge the DOT to reject the ADA-09547 proposal.

Respectfully,

  
Robert Dugan  
P.O. Box 636  
Girdwood, Alaska 99587

Cc: Girdwood Board of Supervisors



May 31, 2023

Alaska Department of Transportation and Public Facilities  
Aviation Leasing, Central Region  
P. O. Box 196900  
Anchorage, Alaska 99519-6900

Dear Alaska DOT and Aviation Leasing, Central Region, Vicki Swain, and Britton Goldberg,

I have been a full-time resident of Girdwood for over 45 years. This letter is in response to the ADA-09547 proposal to lease state airport land in Girdwood.

I am very much against this proposal for the following reasons:

1. This is a state project so it does not have to abide by the Girdwood Plan or the MOA codes.
2. There is a huge drainage issue with the site as has been seen in recent history when the last large hangar at the end of the airport was built.
3. Girdwood's Moose Meadow is used by both locals who live here and tourists who visit both summer and winter. The new proposed structures will significantly encroach into the Moose Meadow and will negatively impact these natural views and the enjoyment of the area.
4. Local historical trails used by locals and tourists will be negative impacted.
5. As with the last large airport structure recently erected there will be endless amount of dump trucks coming in and out of Girdwood (neighborhoods) to get this project both started and finished. The amount of excavation to haul out the unsuitable materials and replace them with suitable materials to the building site are massive.
6. Where is the footprint and plans for this large development and why is there such a short time period for the community to respond?

Sincerely,

Sherry Dugan  
P.O. Box 636  
Girdwood, AK 99587

cc: Girdwood Board of Supervisors

Page	Section	Comment
General	HLB's role as a developer	HLB needs a specific set of policies when/if it acts as a developer and especially in any joint public-private development. HLB also has potential roles as the land owner, manager, planner, and is within the Muni so has privileged access to MOA staff. More care is needed in any future development projects to clarify when HLB is acting in each role.
5	"However, land placed in the HLB inventory is generally: 1. Land reserved for unspecified purposes, or needed for specific or future public purposes; 2. Land determined excess to municipal needs but unsuitable for disposal and development; or 3. Other land determined excess to present or future municipal needs that may be suitable for disposal or development in the future."	Within Girdwood, HLB has taken an increasingly active role in development of land rather than as a land manager (e.g. Industrial Park, Holtan Hills). We note that neither HLB's mission nor the principles for adding inventory support this active development role.
12	HLB Parcels 6-057F (Girdwood Industrial Park Subdivision) – Phase II & III improvements have been ongoing. Additional permit areas were identified, and several permits were issued in Phase II and III.	While additional permits have been issued for GIP, we are not aware of any progress towards Phase II & III. There are ongoing significant management issues at GIP, amplified by the lack of plan.
16	HLB Parcel 6-039* – Replat the parcel into residential lots for disposal.	Consistent with 2023/4 Comprehensive Plan
16	HLB Parcels 6-053, 6-054, 6-055, 6-056 – Pursue disposal to ADOT&PF in support of future Alyeska Highway intersection redesign.	Consider land exchange with DOT&PF land in Girdwood Valley
20	2023 Plans...	Remaining tasks in AR 2022-40 should be listed in the 2023 one-year plan
17	HLB Parcel 6-018 – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2023 as they formulate a cemetery design.	Consider transfer of management to the responsible Dept (Parks?)
17	2023 withdrawal/disposal	Parcel 6-075 transfer to Girdwood Parks & Rec?
24	HLB 6-251, 6-295, 6-296...	Consider transfer of dedicated recreational use land to GPR
n/a	Parcel 6-013?	No mention of this parcel despite its potential for a small affordable housing project.
20	"Girdwood Area Plan Update"	Clarify that "GAP" is the Comprehensive Plan for Girdwood, and future HLB plans and policies should be consistent with this Comprehensive Plan
n/a	Withdrawal from HLB inventory	Work closely with GVSA Housing & Economic Development service to consider land management and/or transfer
50/51	Permits etc	Girdwood Fire & Rescue?
Appendix B	VII. Withdrawals from the HLB Inventory Some HLB lands are needed by other municipal agencies for specific municipal purposes. If the need is permanent or long-term in duration, the Mayor and Assembly may withdraw the land from the HLB Inventory and transfer it to Real Estate Services. IX. A 1. ...HLB staff shall consult regularly with other municipal agencies and the Assembly to determine whether HLB land is needed to fulfill various municipal purposes. If an agency has identified a municipal need for HLB land (present or future), and provides sufficient justification in support of the need, HLB staff may either (a) initiate a process to remove the land from the HLB inventory and transfer to Real Estate Services for transfer of management authority to the requesting municipal agency, or (b) create an Intra-governmental Authorization, and retain the land in the HLB Inventory.	Contradiction here? Is the decision HLB staff or Mayor or Assembly?
Appendix B	C. 6. HLB will deliver an executed Development Agreement along with a pro forma to the HLBAC prior to any resolution seeking a recommendation for disposal.	How can the process allow HLB to make a binding contractual agreement with no oversight?

The Girdwood Board of Supervisors appreciates the work done by the Heritage Land Bank contained within the 2023 Annual Work Program and 2024-3028 Five-Year Management Plan Drafts, and also appreciates this opportunity to comment on the plans.

The GBOS has some comments on specific parcels:

HLB Parcel 6-018 – “Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2023 as they formulate a cemetery design.”

Thank you for including the 6-018 Parcel in 2023 Potential Projects for the 2023 Work Plan. However, the GBOS is not formulating a cemetery design. GBOS has participated in HLBAC meetings during public comment and on the agenda (July 28, 2022 V.b.) over the last two years to update new commissioners on the history and status of the Girdwood Cemetery project. The Feasibility Study (16'), Master Plan Analysis Report (19'), and a Schematic Report (19') detailing the proposed cemetery's four phases has been complete since 2019. The Girdwood Cemetery Committee plans to proceed in earnest this fall for bonding in 2024, once Chugiak/Eagle River and Anchorage Memorial Park are closer to Girdwood's progress. In addition, AO 2023-58, which addresses Public Cemeteries as an area wide power, is being heard by the Anchorage Assembly June 20, 2023.

HLB Parcel 6-039- “Replat the parcel into residential lots for disposal”

The GBOS requests that this and other HLB parcels zoned for residential development carry the stipulation that any residential development must include 25% workforce/community housing, as outlined by the HLBAC recommendations for the Holtan Hills disposal.

HLB Parcel 6-014 - “Evaluate process for disposal, with direct sale, to owners of Alyeska Resort”

The GBOS requests more information about this potential sale, specifically concerning the expected uses of the parcel, the possibility of commercial development, and, if applicable, the availability of housing for any additional employees the proposed development would need.

More generally, GBOS notes that out of the 2022 HLBAC resolutions, 9 out of 10 involving land parcels required amending the work plans in place at that time. Furthermore, one of the most significant recent disposals, the Holtan Hills lands, represented 3 out of the 11 HLB parcels recently identified as developable in Girdwood, and as such should have been included in the annual work plan approved only a few months before. GBOS requests guidelines and clarification about when and how amendments to work plans are warranted.

Furthermore, GBOS notes that considerations for HLB land management include concerns about invasive species, insect damage, vandalism, etc, but not impacts on the local community and economy, particularly from proposed land disposals. GBOS requests the addition of those considerations for any future HLB land disposals within the Girdwood area.

Though not mentioned in the work plan, Girdwood's representation on HLBAC (one designated representative) is marginal relative to the amount of HLB holdings within Girdwood (close to



50%). The GBOS respectfully requests at least 3 HLBAC representatives, given the importance of the HLB lands to Girdwood's community and economy both now and in the future.

## 5-3-2023 Comments to draft HLB 2023 Annual Work Plan & 2024-2028 Five-Year Management Plan

Dear HLBAC Commissioners and Staff:

Please consider these comments when finalizing the draft 2023 annual and five year work plan. Changes to the text are proposed. Reasons for the proposed changes appear as comments. Additions to the 5 year work plan are also proposed.

p. 10- HLB Parcel 6-011, 6-016, 6-017 – The Assembly postponed the Holtan Hills disposal indefinitely at this time the Request for Proposals and the Development Agreement with conditions approved by the HLBAC in Resolution 2022-09(S)\_are indefinitely postponed.

**Comment: Being “guided” by something that neither HLBAC nor the Assembly approved shows disrespect to the Assembly and the HLBAC. It would make more sense to say “HLB is rethinking approaches to disposal of these parcels in light of Assembly Resolution 2023-40 and the recommended conditions approved by the HLBAC”.**

p.14- In the last line of the table referencing Resolution 2022-09 change “Approved” to “Approved with Conditions”.

**Comment: Accuracy- prior action of HLBAC should be acknowledged. It is misleading to suggest the HLBAC approved this disposal. Rather, HLBAC recommended specific conditions to be met prior to approving the disposal. The conditions were NOT met. This appears to be an attempt to rewrite history and mislead the public.**

p.15- HLB Parcels 6-011, 6-016, 6-017\* – The Anchorage Assembly voted to indefinitely postpone the Holtan Hills disposal. The Request for Proposals, Development Agreement, with conditions approved by the HLBAC in Resolution 2022-09(S)\_.

**Comment: See previous comment regarding HLB’s apparent reluctance to reflect prior actions of the HLBAC on this disposal in this report. That HLBAC conditioned any future approval on specific conditions should be mentioned so the public better understands the history.**

**I do not believe “Bifurcation” references any document that has been made available to the public. It should not be referenced as a “guiding document” unless and until it is made available to the public. It does not make sense to be “guided” by a secret agreement.**

p. 15. HLB Parcel 6-014 – Evaluate process for disposal, with direct sale, to owners of Alyeska Resort. Evaluation process to include; 1) consideration of conditions imposed as part of any direct sale consistent with AR No. 2023-40 directing HLB to consider disposal of HLB parcels to qualified Girdwood non-profit in partnership with another entity for the purpose of increasing attainable housing for year-round residents of Girdwood; 2) consideration of offering tax abatement to support development of attainable housing either on HLB Parcel 6-014 or other property owned by owners of Alyeska Resort; 3) consideration of formation of a tax improvement district which would include HLB Parcel 6-014 to support the development of attainable housing.

**Comment: Align with intent of AR No. 2023-40 as Amended including policy goals expressed in Whereas clause of the unanimously approved Assembly Resolution.**

p.15. HLB Parcel 6-039\* - Replat the parcel into residential lots for disposal. Platting process to consider imposition of covenants or deed restrictions intended to further the goal of increasing attainable residential housing stock in Girdwood for people working and living in Girdwood year-round, whose household incomes are 80 to 120 percent of the annualized Area Median Income (AMI) for Girdwood, but also for those persons whose household incomes are below 80 percent of the AMI;

**Comment: This language would be consistent with both AR No. 2023-40 policy goals as referenced in Whereas clauses of increasing supply of housing attainable to people working and living in Girdwood year-round and policy goals of AR 2022-416 to "prioritize the use of uncommitted municipal land to address the housing shortage".**

p.16. \*Per AR2023-40, as amended, the Anchorage Assembly has directed HLB to; 1) "add as an objective to both the HLB 2024-2027 five-year management plan and the HLB 2023 annual work program, in coordination with the Girdwood Board of Supervisors, the disposal of HLB parcels to a qualified Girdwood non-profit recipient, either alone or in partnership with another entity, for the purpose of increasing attainable housing for year-round residents in Girdwood", 2) integrate the housing objectives of an updated Girdwood Area Plan into forthcoming HLB five-year management plans and HLB annual work programs to specifically address housing needs for the Girdwood community; and 3) "For the purpose of increasing attainable residential housing in Girdwood" evaluate feasibility all uncommitted HLB parcels in Girdwood properties for residential and commercial development; and 4) in conjunction with appropriate municipal departments, explore financial mechanisms, such as tax improvement districts and tax abatement, to support the development of attainable housing in Girdwood. Based on the outcome of that report and any additional Assembly direction, the proposed actions may be modified.

**Comment: The draft work plan misstates the wording and intent of AR 2023-40. Proposed changes are taken nearly word for word from AR 2023-40. Suggest amending this language rather than making similarly worded individual changes to work plan references to HLB Parcels 6-057F and 6-076**

**There is no reference in 2023 Potential Disposals of any potential to dispose via lease to Girdwood Community Land Trust of any parcel "for the purpose of increasing attainable housing for year-round residents in Girdwood". Suggest this should be added to the list of potential disposals.**

**The reference to the Girdwood Area Plan update should include more than "continue to be involved" [involvement has been minimal to date]. In light of AR 2023-40 this reference in the plan should include "with the goal of integrating the housing objectives of the updated Girdwood Area Plan into HLB annual work programs and five year management plans".**



#### Chapter 4. Five Year Management Plan

Potential disposal of one or more parcels in Girdwood to a qualified Girdwood non-profit recipient either alone or in partnership with another entity for the purpose of increasing attainable housing for year round residents in Girdwood should be specifically referenced in the 5 year management plan.

Suggest including potential relocation of Girdwood soccer field (currently managed by Parks and Recreation) to HLB 6-036 with HLB obtaining management authority over soccer field as site for potential future residential development (contingent on geotech investigation).

The above should be referenced as potential disposals or exchanges.

Integrating housing objectives of the updated Girdwood Area Plan into HLB five year management plans and annual work programs should be specifically referenced as a potential project. This would be consistent with AO 2023-40.

In conjunction with appropriate municipal departments, explore financial mechanisms, such as tax improvement districts and tax abatement, to support the development of attainable housing in Girdwood should be specifically referenced as a potential project. This is Required by AO 2023-40 so should be included in work plan.

Update of Crow Creek Neighborhood Plan should be referenced as a potential project. HLB itself thought this plan had lapsed when it issued an RFP in 2021. It is woefully out of date. As currently written it is difficult if not impossible to dispose of HLB land in a manner "consistent with" the Crow Creek plan. This will create issues down the road unless the plan is updated.

In advance, thank you for considering these comments.

Brooks Chandler

PO Box 1129

Girdwood

## Public Comment

### 2023 HLB Annual Work Program / 2024-2028 Five-Year Management Plan

May 25, 2023

Thank you for allowing public comment on the 2023 HLB Annual Work Program and 2024-2028 Five-Year Management Plan. I appreciate your time and dedication to the health of Heritage Land Bank land in the Girdwood Valley.

I am writing to you as a resident of Girdwood, and the President of the Girdwood Nordic Ski Club (GNSC). I am commenting on the current 2023 HLB Plan with the perspective of looking back at the past area and management plans, feasibility studies, and the Imagine!Girdwood Community Survey of Recreation Options. Excerpts are from the plans:

1994 Turnagain Arm Management Plan

1995 Girdwood Area Plan

2001 Trail and Open Space Project

2001 Girdwood Commercial Areas & Transportation Master Plan

2005 DOT Girdwood Airport Environmental Assessment for Girdwood Airport Master Plan

2006 Glacier/Winner Creek Resort Development Plan

2007 Girdwood Area Plan

2007 Glacier-Winner Creek Trails Feasibility Study (Commissioned by HLB, Submitted by The Boutet Company, completed by SE Group)

Turnagain Arm Management Plan (1994) has “highly recommended” development of a cross-country ski network as part of an overall approach towards trail implementation of a four season trail system.

The Girdwood Area Plan (1995) states, “preserving significant open space and ensuring public use and access” is important as a destination resort community.

Trail and Open Space Project (2001, Land Design North) reiterates the importance of the trail network in Girdwood as an important cultural resource.

Girdwood Commercial Areas & Transportation Master Plan (2001) “The cross-country and back-country skiing potential of Girdwood Valley has hardly been tapped. With its flat valley floor surrounded by majestic mountain scenery and with its reliably abundant snowfall, Girdwood could be an international destination for Nordic skiing. However, this will require a conscious effort to provide appropriate infrastructure and support services, as well as marketing programs to increase public awareness. Girdwood’s winter trail market may currently be made up primarily of Anchorage area residents, but in the future could extend to the Lower 48 and other countries with appropriate advertising. Similarly, bicycling -- both mountain biking on trails and forest roads and road biking on paved trails -- is increasingly a source of economic activity in resort towns. Many mountain communities in North America have established trail networks and support services designed to attract bicyclists. The demographics of this market are attractive and offer an opportunity to diversify Girdwood’s appeal beyond Alpine skiing, increasing the number of visitors and protecting against downturns in skiing activity.”

Glacier/Winner Creek Resort Development Land Use Plan (2006) “Work with local, state, and federal organizations and private-sector interests to identify financing mechanisms that leverage

public interests with the development program. Good examples of this may include the implementation of the Nordic trail system...”

Glacier-Winner Creek Feasibility Study (2007) The Municipality of Anchorage Heritage Land Bank (HLB) commissioned this study to determine the feasibility of constructing Nordic ski trails in Girdwood, Alaska. HLB proposes to develop approximately 17 kilometers of Nordic ski trails within the Glacier Creek/Winner Creek valleys. The trail will be part of a phased development, and be coordinated with other development initiatives in the area, including the Winner Creek Ski and Golf Resort, the Arlberg Road Extension and the Crow Creek Neighborhood. This study evaluates the conceptual alignment that had been developed in conjunction with the concept plan for a golf and alpine ski resort in the study area (The SE Group Concept Plan)

According to the Girdwood Area Plan (2007) The Land Use Map within the Land Use Plan shows a large portion of both 6-011 and 6-251 as a Recreation Reserve. This distinction has been repeated in the latest 2023 Imagine!Girdwood Land Use Mapping Work Session. In the 2007 Girdwood Area Plan it states, “The community has almost as many supporters of Nordic skiing as alpine skiing” (41% Nordic; 52% alpine).

DOT Girdwood Airport Environmental Assessment for Girdwood Airport Master Plan (2005) “The Girdwood Area Plan (MOA 1995) calls for preparation of a specific management plan for the **recreation reserve area**, which is located on the northern end of the airport property. It suggests a plan should "include a relocation of the trailhead in the clear zone at the north end of the Girdwood airstrip." The Iditarod National Historical Trail runs along the west side of Glacier Creek.”

As a whole, these past plans emphasize the importance of a year-round trail system, which HLB advocated for, to create a destination resort community including **Parcel 6-011** (on the east side of Glacier Creek and north of Girdwood Airport) labeled as “Resort and Recreation Reserve”. These plans comment specifically that Nordic skiing and biking are activities that attract tens of thousands of visitors to resort destination through North America. The authors of these plans, even 15- 20 years ago, recognize that Nordic skiing and biking were/are growing in popularity, and recognized the potential in Girdwood to create a source of economic activity as a Resort Trail Town.

The community has voted twice in favor of new Nordic trails in the upper Girdwood Valley (HLB property 6-011 as 6-251). In the current draft of the Girdwood Trail Plan, there is a proposed looped trail system in Parcel 6-011 a trail connection heading north towards Winner Creek within Parcel 6-251. This area, on the east side of Glacier Creek, is heavily use by local skiers, walkers, snowshoers, and bikers. This open space is ideal for recreation and important to wildlife and wetland preservation. The Arlberg parking lot closest access to these trails is overflowing on a daily basis. We are an outdoor recreation community.

HLBAC passed **Resolution 2017-09 (6-0)**: A Resolution recommending Assembly approval of the disposal by a public use easement to Girdwood Nordic Ski Club of portions within HLB Parcel 6-011, legally described as Tract I Alyeska Subdivision Prince Addition (Plat 87-131) for twenty years. Ms. Jones-Vogel presented the staff report including a map for the disposal to the Girdwood Nordic Ski Club. After that resolution, GNOSC contracted HDR and Nordic Olympian & Trail Designer Bill Spencer, to design a trail system which was approved by Girdwood Trails Committee, Girdwood Land Use, GBOS, and is within the Girdwood Trails Plan headed to the Anchorage Assembly for approval. Once approved, we can move forward to the UDC and HLBAC for final layout and design concept.



In the 2018 HLB Annual Work Program, both the Girdwood Nordic Ski Club (GNSC) **Resolution 2017-09** and Girdwood Mountain Bike Alliance (now Bikewood) **Resolution 2017-05** were listed as active.

In the 2020 HLB Work Program and 5 Year Plan and 2021 HLB Work Program and 5 Year Plan, neither GNSC or Bikewood Resolutions are listed. In this 2023 HLB Work Program and 5 Year Plan, neither the Active Easement **2015-17** agreement, nor the Resolution **2017-09** is listed.

Another concern, however, is that Parcel 6-011 has rumored discussion of an Alpine Village development plans. This parcel, as mentioned in your report to the Enterprise and Utility Oversight Committee, would cost over \$8M to bring in infrastructure which ranks it low on suitability for development. More importantly, a portion of Parcel 6-011, as mapped in Resolution 2017-09, is directly north of the Girdwood Airport. The flight path for all incoming-outgoing helicopter operations including three Heli-Ski operators, all rotorcraft external long-line traffic, all incoming fixed-wing traffic, and year-round commercial helicopter operations, is directly over this section of Parcel 6-011. If HLB considers developing this area, it would create a “congested area” and referencing FAA 14CFR 133 it states external rotorcraft long-line operations are not allowed over congested areas. Development would essentially squeeze all helicopter sling-loads over the Glacier Creek area and push these flights west towards the planned Holtan Hills parcel. The aircraft noise is more significant than you realize. Currently the Girdwood Airport long-line flights include: sling-loading to the APU Training center on Eagle Glacier (supplies all summer long for skiers and scientists, and the new building construction will more than triple these flights), USFS sling-loads for trail maintenance supplies to Berry Pass and Crow Pass, Punch Bowl Glacier sling-loads for summer dogsledding operations, summer rafting sling-loads to Twenty Mile River, sling-loads of damaged aircraft coming into Girdwood Airport for repair. The current north-south (outgoing-incoming) flight path was established for safety and noise abatement, and is only direction available as west, south, and east of the Girdwood Airport are already “congested areas”. Creating a new congested area directly north of the airport would alter flight traffic and change noise abatement parameters for the Girdwood Valley.

Of the eleven curated HLB Parcels for development submitted by staff, the portion of Parcel 6-011 east of Glacier Creek and north of the Girdwood Airport should be removed from the list based on infrastructure costs, and environmental concerns - including noise pollution from aircraft traffic, and zoning not being appropriate for residential or commercial development with the large Girdwood Airport development on the horizon. Aviation traffic will only increase. Merrill Field is a perfect example of what happens when condominiums are built next to the airport – limited times of operations, no external lone-line operations, and daily noise complaints.

Part of HLB Land Management Objectives are creating conservation easements to protect area wetlands, and ensuring open space conservation and preservation opportunities considered in your development projects. A connected trail system in Parcels 6-011 and 6-251 would serve HLB’s management objectives, the health of the community, and economic development for Girdwood. Trail systems are not considered “congested areas” in the FAA 14CFR 133, and would allow all commercial aircraft to continue valuable long-lining practices away from developed areas.

Additionally, in the winter, groomed trails provide a valuable resource for both physical and mental health. Grooming trails in the uplands versus wetlands provides more user days and a solid surface for uninterrupted trail use. (meadows require 2ft of snow before grooming can commence, and the unpredictable rains put grooming on pause throughout the winter). The changing climate and unreliable surface make upland trails a more reliable recreation resource for groomed winter trails.

Having a reliable groomed winter trail system that loops back to the parking area and connects to other winter trails would be a valuable asset for the Municipality of Anchorage/Girdwood. All of Girdwood's B&B's and The Alyeska Resort list cross country trails on their websites as a marketing draw. While many locals love touring on ungroomed trails, the majority of visitors like to bike on groomed or packed single-track trails, ski on the 5K Loop, and walk or ski the social groomed loop in Moose Meadow and Stumpy's Winter groomed trails. Local businesses rent winter bikes and Nordic ski equipment. The FVCS kids Nordic ski program continues to grow, and FVSC and Alyeska Resort both developed Adult Nordic Ski lessons this year. These programs rely on groomed trail networks.

Considerations for HLB Staff concerning 2023 Annual Work Program and Five-Year Management Plan:

- 1) Include both the Girdwood Nordic Ski Club's active Easement Agreement 2015-17 in the active Leases and Permits list.
- 2) Include Resolution 2017-09 in the Potential Disposals, Exchanges, & Transfers list.
- 3) Complete the active Easement Agreement 2017-05 with Bikewood and include in the Leases and Permits list within HLB Plan.
- 4) Rezone Parcel 6-011 (east of Glacier Creek, and north of the Girdwood Airport) from Commercial to Recreation Reserve to maintain safety zone for Girdwood Airport operations, including necessary long-line operations, and create a sustainable trail system as discussed in the HLB Glacier-Winner Creek Trails Feasibility Study.

Thank you for your time with this comprehensive 2023 HLB Annual Work Program and 2024-2028 Five-Year Management Plan rewrite. The photo you chose as the cover of this plan is timely. Featured on the cover is Parcel 6-251, and it deserves to be protected as a recreational reserve.

I really appreciate the time for public comment and the time HLB (and MOA) has spent creating healthy public use areas in Girdwood.

Sincerely,

Deb Essex  
Girdwood Nordic Ski Club

**From:** [B Sullivan](#)  
**To:** [Tyler, Margaret S.](#)  
**Subject:** HLB Comments Cemetery  
**Date:** Sunday, May 28, 2023 9:37:20 PM

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## [EXTERNAL EMAIL]

Greetings Margaret!

Thank you for taking GBOS comments. I had the idea to write Cemetery Comments before last week, so I will submit them here. Please feel free to use your super editing wand to help convey the message. My most basic message is that GBOS is not formulating a cemetery design.

I'll put it in order of 2023, then oldest to newest if there's some context that helps at all.

Thank you!

Briana

## 2023 Potential Projects

*HLB Parcel 6-018 – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2023 as they formulate a cemetery design.*

\*Thank you for including the 6-018 Parcel in 2023 Potential Projects for the 2023 Work Plan. GBOS has participated in HLBAC meetings during public comment and on the agenda (July 28, 2022 V.b.) over the last two years to update new commissioners on the history and status of the Girdwood Cemetery project. The Feasibility Study (16'), Master Plan Analysis Report (19'), and a Schematic Report (19') detailing the proposed cemetery's four phases has been complete since 2019. Once Chugiak/Eagle River and Anchorage Memorial Park were closer to Girdwood's progress, in 2022 the Girdwood Cemetery Committee was preparing to have the three cemetery projects go to bond (for 2023), and plans to proceed in earnest this fall for bonding in 2024. In addition, AO 2023-58 specifically addresses Public Cemeteries as an areawide power. This AO is being heard by the Anchorage Assembly June 20, 2023. \*

### **Here are the HLB work plan/ management plans for reference:**

#### 2015 current and continuing projects

Girdwood Cemetery – The Girdwood Cemetery Committee has requested a portion of HLB Parcel 6-018 be reserved for a community cemetery in Girdwood. Girdwood is pursuing a ballot proposition to add taxing powers for a cemetery on the April 2015 election.

#### 2016

Appendix E & F - no mention of Girdwood Cemetery

#### 2017 Potential Projects

Girdwood Cemetery – The ballot proposition in 2015 passed and Girdwood Cemetery Committee continues to seek a suitable site to locate the cemetery. Girdwood staff hired CRW Engineering, LLC to conduct a feasibility study on HLB Parcel 6-018 – the study supported the feasibility of the



cemetery site on this tract. Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2017 as they formulate a cemetery design.

#### 2018 Potential Projects

Girdwood Cemetery – The ballot proposition in 2015 passed and Girdwood Cemetery Committee continues to seek a suitable site to locate the cemetery. Girdwood staff hired CRW Engineering, LLC to conduct a feasibility study on HLB Parcel 6-018 – the study supported the feasibility of the cemetery site on this tract. Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2018 as they formulate a cemetery design.

#### 2019 Potential Projects:

Girdwood Cemetery – The ballot proposition in 2015 passed and Girdwood Cemetery Committee continues to seek a suitable site to locate the cemetery. Girdwood staff hired CRW Engineering, LLC to conduct a feasibility study on HLB Parcel 6-018 – the study supported the feasibility of the cemetery site on this tract. Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2019 as they formulate a cemetery design.

#### 2020 Potential Projects

HLB Parcel 6-018 – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2020 as they formulate a cemetery design.

#### 2021 Potential Projects

*HLB Parcel 6-018* – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2021 as they formulate a cemetery design.

#### 2022 Potential Projects

***HLB Parcel 6-018*** – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2022 as they formulate a cemetery design and seek funding. Staff recommends that the HLBAC establish a limit on time that a property be held for a project without regular updates and progress. Identification of a parcel through a study does not create the requirement that HLB hold a parcel for that purpose. The same consideration should be made for the Eagle River cemetery selection.

#### 2023 Potential Projects

*HLB Parcel 6-018* – Continued collaboration with Girdwood Board of Supervisors and the Cemetery Committee will occur in 2023 as they formulate a cemetery design.