

Dear Director Wilber and HLB staff,

As you are aware, 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 thanks you for the opportunity to provide Public Comment on the Heritage Land Bank 2023 Annual Work Program and 2024-2028 Five-Year Management Plan.

We will firstly address some general observations on the mission and role of HLB, especially as they relate to Girdwood Valley. These will be followed by a table of comments and suggestions on specific sections of the document. Where relevant to specific sections of the work plan, the table will also expand on the general comments.

General comments and observations

- **HLB taking the role of developer rather than a land manager.** Within Girdwood, HLB has taken an increasingly active role in the development of land rather than as manager of a land bank. The most prominent instances are Girdwood Industrial Park and the Holtan Hills proposal. We note that neither HLB's mission nor the principles for adding inventory support this active development role. If HLB is going to continue to act as a developer, especially when in partnership with private developer(s), then HLB with the guidance of HLBAC, needs to adopt a set of policies which delineate how the public interest will be maintained as the overriding priority. In such situations, HLB also has actual or potential conflicting roles as the land owner, land manager, plan sponsor, benefactor and/or funding source. As an entity within the Municipal administrative structure, it also has privileged access to MOA staff. Public trust is especially important, regarding HLB exercising their power appropriately.
- **Acknowledge impact of HLB actions on the local community.** HLB states a set of interests which guides its land management practices, primarily *“to maximize benefits to the Municipality and the public, seeking to preserve and enhance the value of its land assets.”* It also aims to ensure that land is *“reasonably protected from adverse impacts, including fire, insect damage, plant disease, invasive species, illegal dumping hazardous or contaminated materials, timber theft, vandalism, and other threats.”* As a part of the Municipality, Girdwood does see a fractional benefit from benefits to the Municipality-as-a-whole. But GBOS urges that HLB acknowledge that negative impacts from its decisions are usually felt the greatest in the community where the land is physically located. This asymmetry between benefits to the whole Municipality, but costs borne locally, has been at the core of HLB's most contentious projects within Girdwood.

- **Girdwood Industrial Park (GIP)**, This facility is of critical importance to the economic development of Girdwood and a plan for full development needs to be established. GBOS has repeatedly asked for the GIP to be in the HLB Annual Work Program and for the completion of Phase II and III to be prioritized. In the 2023 Work Program, there is mention of evaluating options for development of the GIP. This is welcome, but again appears to be delaying improvements to later years. The options should also include withdrawal from the HLB inventory and move to other Municipal management. In the meantime, permittees continue to endure ongoing issues with access, availability of power, boundary encroachment and a lack of stability due to the continued use of one-year temporary permits. We urge HLB to treat these ongoing concerns and the long-term plan as a high priority.
- **Land intended for recreational use.** Areas which are intended for long-term recreational use, such as the area around the Nordic Loop, should be withdrawn from HLB inventory and managed by the Municipal entity dedicated to recreational use. In the case of Girdwood, this would be Girdwood Parks and Recreation. We acknowledge that there are patent issues surrounding some or all of parcels 6-011, 6-251, 6-295, 6-296, so it may not be possible to initiate the transfer of parcels in 2023. However the goal of transfer should be acknowledged in the Five Year Work Plan. In the meantime, we urge HLB to continue to work with Trails groups in support of the Girdwood Trails Plan as it moves to adoption.

GBOS further notes that the HLB Advisory Commission recently passed a resolution requesting every individual trail to be included in advance in each Annual Work Plan. GBOS has yet to take a formal position on HLB AC's resolution, but notes that the purpose of creating a Girdwood Trails Plan was in part to outline a coherent set of related trails, hence avoiding the need to treat each trail component as an entirely new project. We anticipate GBOS making a formal statement on this matter soon.

A network of appropriately integrated and developed trails works toward maximizing the benefits to the Municipality and the public, who travel to Girdwood by the thousands year-round primarily for recreation and outdoor experience throughout all seasons.
- **Girdwood South Townsite**, These tracts (6-076 and 6-134) have been included in HLB plans since 2015, identified as potential projects and/or potential disposal, exchanges and transfers. GBOS welcomes that there is an applicant for parcel 6-076 who are prioritizing community use of the tract and have additional plans consistent with the goals of AO2023-40.
- **Girdwood Cemetery project.** Thank you for including the 6-018 Parcel under 2023 Potential Projects, and intending to collaborate with GBOS. To provide more complete context, GBOS has participated in HLBAC meetings over the past two years both during public comment and on the agenda (7/28/22 item V.b.) to update new commissioners on the history and status of the Girdwood Cemetery project. This has moved through Feasibility Study (2016), Master Plan Analysis Report (2019), and most recently a Schematic Report (2019) which envisions development in four phases over multiple

decades. There have been delays in funding the development in part due to confusion over whether cemeteries are managed - under service areas or as an areawide service. An Assembly Ordinance has been introduced to clarify that they are an areawide power, which will ease future bonding for construction. Once the ordinance is adopted, we recommend that parcel 6-018 be withdrawn from the HLB inventory and transferred to MOA Parks and Rec who will manage the areawide cemetery power.

- **Frequency of amendments to the Work Program.** GBOS acknowledges that “*Predicting future municipal need and market demand is difficult.*”(p5) with respect to the five year plan, but notes that of the 2022 HLBAC resolutions involving land parcels, 9 of 10 required amendments to the Annual Work Program. There should be a much higher level of predictability about HLB’s actions over the next year. GBOS requests that additional guidelines be provided about when and how amendments to the Annual Work Program are warranted.

Section-specific Comments

Page	Section	Comment
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 toward Phase II & III. There are ongoing significant management issues at GIP, amplified by the lack of long-term plan. Fixing existing problems and developing a plan for full development of the Girdwood Industrial Park must be a high priority within the 2023 Work Program, either by HLB doing the necessary work or by transferring management responsibility.
16	HLB Parcel 6-039* – Replat the parcel into residential lots for disposal.	Acknowledge that future residential development of public land must be consistent with the updated Girdwood Comprehensive Plan. The updated plan will include stipulations on how public land should be used for community housing.
17	HLB Parcel 6-039 - Suggests Phase II of the Iditarod National Historic Trail (INHT) is placed on hold until completion of the Girdwood Trails Plan and “GAP.”	The mention of pausing Phase II of the Iditarod National Historic Trail (INHT): Please see Girdwood Trails Plan for alignment information and Girdwood Comprehensive Plan for current recommendations.
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 other DOT&PF land in Girdwood Valley, e.g. land unusable for aviation at Girdwood Airport.

Page	Section	Comment
15-20	2023 Work Program	<p>Remaining tasks in AR 2022-40 should be listed in the 2023 Annual Work Program & 5 Year Management Plan.</p> <p>Specifically, AR2023-40 line 10-16 states <i>“uncommitted developable HLB land in Girdwood to be disposed to a qualified Girdwood non-profit entity, either alone or in partnership with another entity, for the purpose of increasing attainable residential housing stock in Girdwood; and such conveyance be an objective in both the 2024(sic)-2027 5 year Management Plan and the HLB 2023 work program. See Section 1.”</i></p>
17	HLB Parcel 6-018	<p>Consider transfer of management to the responsible Municipal Dept, i.e. Parks. Land that has a future identified purpose should be transferred to another Municipal Department. The Girdwood Cemetery Committee is beyond ‘formulating a design’ step in the current process.</p>
17	2023 withdrawal/disposal	<p>Add into 2023 Annual Work Program: Parcel 6-075: withdrawal from HLB inventory and transfer to Girdwood Parks & Rec (GPR)</p>
24	HLB 6-251, 6-295, 6-296...	<p>Consider transfer of dedicated recreational use land to GPR as patent issues are resolved. Lands identified as</p>

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		recreational use only be transferred to the proper Municipal Department.
15-20	2023 Plan for Parcel 6-013	No mention of this parcel in the work program or in the AR 2023-40 report to Assembly despite its high potential for a small affordable housing project. Please address this parcel.
16	Parcel 6-014	The GBOS requests information concerning the expected uses of the parcel, i.e. possibility of commercial development and, if applicable, the availability of housing for any employees such development would need.
20	"Girdwood Area Plan Update"	Clarify that "GAP" is the Comprehensive Plan for Girdwood, and future HLB plans and policies need to be consistent with this Comprehensive Plan
21-24	Five Year Management Plan: 2024-2028	Addition: Work closely with GVSA Housing & Economic Development service to consider withdrawal of parcels from HLB inventory and transfer to GVSA
50-51	Permits list	Add Girdwood Fire & Rescue permit at Girdwood Industrial Park

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Appendix B	Policies: Section VII vs Section IX. A 1	There appears to be a contradiction between these two sections. Section VII states that a Withdrawal action is made by the Mayor and Assembly. However Section IX suggests that HLB Staff decide if an application by another agency is sufficiently justified and can instead initiate an IGA while retaining the land.
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?

Thank you for the opportunity to comment on the draft 2023 Annual Work Program and Five-Year Management Plan. Events over the past couple of years have strained the relationship between HLB and the community of Girdwood; the location of the majority of HLB's current land holdings. GBOS welcomes the recently funded position of Real Estate Consultant to HLB who will be representing the public's interests in future development arrangements. We look forward to returning to a more cooperative and collaborative relationship with HLB, and hope that the comments and recommendations above are received as they are intended, as steps toward those goals.

