Proposed Amendments to the "2025 2045 Homer Comprehensive Plan Update Core Plan: Public Hearing Draft"

from the Homer Housing Policy Workgroup

Mission: The #1 priority for the Homer Community for the next 10-20 years—with 87 percent of community survey respondents believing that increasing the supply and accessibility of affordable housing is important per the Comp Plan Survey—is to "increase the supply and accessibility of affordable housing." Our mission is to identify policy tools that can help achieve both affordable and attainable housing.

Vision: Homer is a place where every community member has a home that they can afford. Attainable housing is the bedrock of sustainable economies, and community, family, and individual wellbeing.

A shared Project of MAPP and Guiding Growth, the Homer Housing Policy Workgroup has been meeting regularly over the course of a year to discuss viable policies (legal and consistent with local values) to improve accessibility of attainable housing. We recommend the following changes to the Draft Comprehensive Plan.

"Affordable Housing" is defined by HUD as "housing for which the occupant(s) is/ are paying no more than 30 percent of his or her income for gross housing costs, including utilities."

"Attainable Housing": Attainable housing is housing that is affordable to people earning around the Area Median Income (AMI). Households living in attainable housing and earning between 80% and 120% of the AMI should not need to spend more than 30% of their income on housing costs. (attainablehome.com).

"Area(wide) Median Income" for a household of 4 is \$107,400 (huduser.gov). City of Homer median household income is \$69,757 and non-family household income is \$55,263 (US Census). By these measures, the monthly cost of attainable housing in Homer, including utilities, taxes, and insurance, is between \$1,105 and \$3,222.

Key:

Strikethrough means we recommend striking language. **underline** Means we recommend adding language

The Pressure of Seasonal Tourism on Housing

The City of Homer experiences significant pressures from seasonal tourism.

Commercial and residential housing stock becomes increasingly unattainable during the summer months as second/vacation homeowners return, seasonal staff arrive, and longer-term rentals are converted to short-term lodging. This convergence drives down the availability of housing and drives up the price of housing to unattainable levels for both year-round residents and seasonal workers. The downstream economic consequences can be detrimental to both residents and businesses. Locals have difficulty finding year-round rentals, neighborhoods become de facto "mixed use" zones, with absentee owners offering short-term rentals. Without sufficient housing stock for seasonal and year-round employees, businesses are forced to reduce hours of operation and services while increasing their labor expenses to offset the higher cost of living. These pressures can extend as far as impacting visitor satisfaction and even the ability of businesses to survive.

Additionally, Homer's total available housing stock is augmented by a high rate of second homes, many of which are occupied for a portion of the summer, and then either sit vacant or are rented on a short-term basis the rest of the year. The US census estimates that 20 percent of homes in Homer are "vacant," the great majority of these are second homes, with the Kenai Peninsula Borough Office of Land Management reporting that in 2024, 1,329 out of 5,235, or 25% of homes in the Homer-area (south of Anchor Point and North of Kachemak Bay) are owned by out-of-area owners. High rates of second homes drive down availability and drive up cost of housing. Policies and partnerships that raise revenue from non-occupied homes to support year-round attainable housing are among the best tools available to ameliorate these pressures.

Short-Term Rentals

In the Homer Comprehensive Plan Revision Community Survey, about 18 percent of respondents identified vacation rentals as a barrier to housing, reflecting concerns about housing availability and neighborhood integrity. Data about the number of short-term rentals in Homer varies: the City identified approximately 326 short-term rental units in 2022 using now-discontinued city software. This represents 14.8 percent of the total housing stock, a notably high percentage compared to other communities in Alaska, with Homer only second to Girdwood for Air BNBs. The Kenai Peninsula Borough Land Management Department estimated 475+/- Airbnb, and 260 +/- VRBO offerings in the "greater Homer area" in its March 2023 Homer Housing Review. Growing support exists within the community for prohibiting short-term-rentals on property that is not the operator's primary residence, to preserve residential neighborhoods and ensure housing availability for long term residents and workers.

p. 34 add this table back to the plan:

Figure 13. Short-Term Rentals as a Percent of Total Housing Units

Table from the Girdwood Economic and Housing Analysis, April 2024

Community	Short-Term Rentals	Total Housing Units	Percent of Total Units
Girdwood	310	1,839	16.9 percent
Homer	326	2,201	14.8 percent
Kenai Peninsula	2,149	31,330	6.9 percent
Sitka	151	4,229	3.6 percent
Juneau	379	13,792	2.7 percent
Kodiak Island	140	5,450	2.6 percent
Chugach	72	3,287	2.2 percent
Matanuska-Susitna	903	42,018	2.1 percent
Ketchikan Gateway	127	6,427	2.0 percent
Anchorage, Municipality	2,323	118,293	2.0 percent
Fairbanks North Star	717	44,270	1.6 percent
Wrangell-Petersburg	37	3,251	1.1 percent

Sources: U.S. Census Bureau, American Community Survey 5-Year Estimates (2017-2021); City of Homer October 2022 City Council Work Session; Alaska Department of Labor and Workforce Development, Alaska Economic Trends, September 2022; AirDNA Quarterly Reports for Girdwood 2023 Q3.

Add the attached information on second homes from the KPB borough as a table.

p. 35 Add <u>Second Homes</u>, <u>Short Term Rentals</u>, <u>attainable housing</u> and <u>affordable</u> <u>housing</u> to table of Housing Indicators, using above language for descriptions of "what it tells us."

Second Homes- Description: <u>Unoccupied or seasonally occupied homes with out-of-area and out-of-state owners..</u> "What it tells us": <u>Percentage of housing stock available for full-time occupancy. Large percentages of second homes have drive up the cost of building and renting homes.</u>

Short Term Rentals- Description: Short Term Rentals are rented through online marketplaces and may or may not be occupied by the owner. "What it tells us":

Percentage of housing stock available for full-time occupancy. Large percentages of vacation rentals drive up the cost of building and renting homes:.

"Affordable Housing" Description: <u>Defined by HUD as "housing for which the occupant(s) is/are paying no more than 30 percent of his or her income for gross housing costs, including utilities. "What it tells us" <u>affordability and availability of homes for those in lower income brackets.</u></u>

"Attainable Housing": Description: Attainable housing is housing that is affordable to people earning around the Area Median Income (AMI). Households living in attainable housing and earning between 80% and 120% of the AMI should not need to spend more than 30% of their income on housing costs. What it tell us: affordability and availability of housing for those in the median income.

P. 34 add: <u>Update existing Homer City Code allowing bed and breakfasts only on the premises of the operator's primary residence in Rural Residential and Urban Residential residential neighborhoods to specify (a) that the code applies to both bed and breakfasts and short term rentals and (b) that it applies in new zoning area "Transition Residential". Add * to indicate that code change needed.</u>

- Rationale: This is housekeeping. This is likely the single easiest and most impactful code step that the City can take regarding housing. It is a no-brainer considering the codes on the books prohibiting B&B's that are not on the premises of the operator's primary residence in neighborhoods (HCC 21.12.020), consistent with the same requirement for other "Home occupations" (eg. lawyers and seamstresses) in neighborhoods (HCC 21.51.100).
- p. 34 add Add: Incentivize long-term rentals and disincentivize proliferation of short-term rentals in neighborhoods. Add * to indicate that code change needed.
- Rationale: The percentage of the housing stock tied up in short-term rentals plays a significant part in the cost and availability of housing in Homer, as this plan notes.



Sunday, October 26 2025

Stormwater Workgroup Proposed Amendments to "2025 2045 Homer Comprehensive Plan Update Core Plan: Public Hearing Draft"

Mission - Our mission is to identify policy tools to work toward the Homer Community's priorities, identified in public surveys in 2024, including "Preserve open public spaces within the city from development," "Create a livable, walkable, vibrant downtown," "Increase access to recreational opportunities for visitors and residents," "Prepare for and address the effects of climate change on Homer" and where 77 percent of the 551 community survey respondents said that preserving open public spaces within the city from development was important and 34 percent of residents listed sustainable and resilient development as the single most important priority.

Vision - Homer is a place where high-value open spaces are preserved from development, people have access to a range of outdoor recreational opportunities, and we are efficiently preparing for and mitigating against the public hazards of landslides, flooding, drought, fire, and low water quality.

The Homer Stormwater Workgroup is a group of citizens who have been meeting regularly for over two years with local experts on wetlands, peatlands, landslides, hydrology, water quality, planning, soils etc. to identify metrics and policy tools to support the Homer community's values of open space, outdoor recreation, and mitigating the hazards associated with climate change. We recommend the following changes to the Draft Comprehensive Plan.

Key:

Strikethrough - recommend striking language.

underline - recommend adding language.Key to suggested changes:

* - Code Needed

p. 15-16 Modernized Zoning is Essential for Attainable Housing, **Quality of Life**, Safety, and Future Growth



Homer places a high value on preserving its small-town character through growth that prioritizes equitable access to resources, respects ecological benefits and limits, **provides access to public open space and outdoor recreation,** and enhances local resilience. Aligning Homer's zoning code with these goals is essential to support equitable housing, **quality of life**, reduce long-term hazard risks, and ensure that future growth respects the City's landscape and resources.

p. 15 Residents want code updates that allow for more flexibility in building types, establish consistent guidelines on building height and footprint, incentivize infill and redevelopment in appropriate areas, promote walkability, and ensure that private and public development considers runoff, slope stability, infrastructure capacity, and support the public value for open space and outdoor recreation.

p. 16

Community members expressed strong interest in improving park facilities, expanding all-season trail network where feasible, protecting more public open spaces within the city from development, and ensuring beach access remains safe and publicly available. Specifically, residents want development and growth to be more integrated and compatible with the local environment. Solutions called out by residents in surveys and meetings include green infrastructure incorporation, open space preservation, and greater attention to development standards for both private development and public infrastructure. As Homer continues to grow, protection of and access to public open spaces, and access to existing open space will be a key factor in maintaining health, social connection, and quality of life for all residents.

P. 16 Goal B: Plan for responsible development that balances environmental impacts, **public outdoor recreation and open space**, community connections, and infrastructure capacity.

P. 17

Category: **Low Impact Development**

Intended Land Uses: Lower density areas with restrictions on footprint, height, cut, fill and grade, for use in mapped riparian areas, peatlands, wetlands, wooded areas, critical shorebird and moose habitats, and unstable slopes.

Application Areas: Mapped Environmental Constraints Areas.

Use Examples: Single family or multi family units with smaller footprints,

conservation areas.

2018 Designation: Not Included



p. 20 Change this map to a GIS map with layers that overlay parcels so we can all see what areas are designated for what. Layers should include hydric soils, peatland depths, unstable slopes, wetlands, bird and moose habitat, trees, creeks (eg. important drainages like Diamond Creek, Bear Creak, Woodard Creek etc.), shorebird habitat eg. E-Bird Hotspots.

P. 20 Show the ADF&G Airport Critical Habitat Area as designated for Conservation.

p.20 Tie layers to Low Impact Development zoning.

- -This matters because this map is the (legal) basis for rezoning.
- -It is misleading to suggest, for example, as this map does that one could build "Varied housing types, community garden, neighborhood café, corner store, schools, churches" on the steep slopes and landslide hazard areas east of East Hill Rd. The Light Industrial zoning at the Baycrest Overlook should be changed to Low Impact Development based on the slide hazard. Other Examples include Areas around Beluga Slough and at the base of the Spit need to be designated for Conservation or Low Impact Development due to public significant value in protecting the integrity migratory shorebird habitat and the cultural and economic value of birding and the Shorebird Festival and.

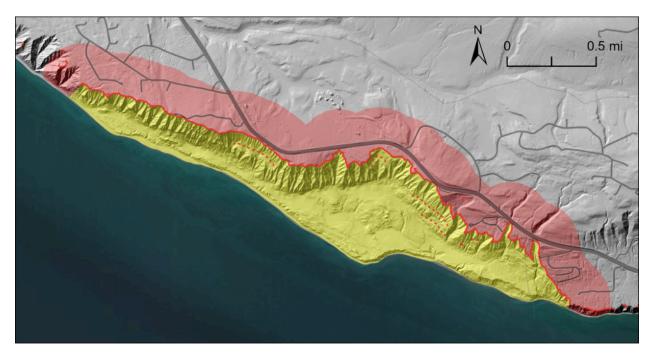


Figure 8. Deep-seated landslide susceptibility near the Bluff Point landslide (red polygon). The landslide body (yellow area, south of the red headscarp line) is the landslide deposit and is also susceptible to repeated failure.



P.21 Gauge community and stakeholder support for Implement zoning and policy tools that expand housing options, such as density bonuses, Iong-term rental incentives, generate revenue to incentivize long-term rentals and attainable housing development, parking requirement adjustments, and other potential incentives for affordable and long-term housing development.

Table 2 on p. 21

C. Clarify consistent standards for building height, footprint, and viewshed for each zoning area. Eliminate the Planned Unit Development loopholes and minimize the use of Conditional Use permits that allows for unequal application of standards and raise the bar for the use of Conditional Use Permits.'

Rationale: Planned Unit Developments and Conditional Use Permits should be replaced —as much as possible—with good, simple, guidelines for what is and is not allowable in any given zoning area. Planned Unit Developments are essentially a loophole to throw standards out the window, and should be eliminated. Conditional Use Permits should be used sparingly, because while some "flexibility" in code may be appropriate in rare cases, CUPs open an avenue for preferential treatment and inconsistent building standards - they are complex, confusing, and take a lot of time for staff, the public, and commissions.

p. 22 Table 3

Action: Use GIS Layers showing parcels, hydric soils, peatland depths, unstable slopes, wetlands, bird and moose habitat, trees, creeks (eg. important drainages like Diamond Creek, Bear Creak, Woodard Creek etc.), shorebird habitat eg. E-Bird Hotspots to create appropriate grading, drainage, vegetation clearing, building setbacks, height and footprints.

Who: City Administration, Community Development Department, Pubic Works

Department, Planning Commission
Estimated Costs: Undetermined

Target Timeframe: Short (1-2 years)

P. 22 Table 4

Action: Inventory lands using geographic information systems (GIS) and develop a strategy for targeted open green space acquisition and use the map to promote and encourage the identification and conservation of open spaces including



access to greenbelts, parks, coastal refuges, and state parks, e.g., Diamond Creek Recreation Site.

Who: City Administration, Parks, Art, Recreation and Culture Advisory

Commission, Public Works Department, City Council

<u>Estimated Cost: Undetermined</u>
<u>Target Timeframe: Short (1-2 years)</u>

Action: Buy and conserve Open Spaces for public use and outdoor recreation

Who: City Administration, Parks, Art, Recreation and Culture Advisory

Commission, Public Works Department, City Council

Estimated Cost: Undetermined

Target Timeframe: Short (1-2 years)

p. 24

Encourage public-private collaboration methods for natural open space protection, such as working with entities including the state and federal government, Homer Trails Alliance, Center for Alaskan Coastal Studies, and Kachemak Heritage Land Trust.

Page 29. Develop a long-range stormwater drainage and management plan to mitigate negative downstream impacts such as property damage, bluff erosion, and pollution"

- a) Maintain existing stormwater infiltration and conveyance systems.
- b) Incorporate green infrastructure projects into City's capital projects plans and budgets.
- c) Update the stormwater master plan at least every 5 years to comprehensively manage the impacts of stormwater across Homer.
- d) Update green infrastructure mapping to identify and retain natural drainage channels and important wetlands that serve drainage functions.
- e) Develop watershed plans, as appropriate, to inform the stormwater master plan and decision-making processes.
- f) Adopt code that provides the City the authority to address stormwater management during the development process.
- g) Develop and adopt area-wide stormwater management standards that utilize nationally recognized stormwater management practices and controls; low impact development and/or green infrastructure concepts for new projects and redevelopments as appropriate.
- h) Inform residents and visitors of the value of green infrastructure in reducing infrastructure costs, as well as educate the community on which types of green infrastructure works best in Homer.



h) Update and refine the Low-Impact Development Plan (also referred to as the Green Infrastructure – Stormwater Master Plan). The plan should consider water quality, inflow and infiltration, climate change, and erosion, and provide recommendations for implementing proactive stormwater management. The plan should also identify strategic locations for real estate acquisitions to support green infrastructure.

i) Create an updated holistic, regional map of the stormwater network to ensure stormwater management decisions are made appropriately for each stormwater drainage basin for a system wide improvement.

Sincerely,

Penelope Haas

Vice-President Kachemak Bay Conservation Society From: Hal Shepherd

To: Department Clerks

Subject: Written Testimony Submittal

Date: Monday, October 27, 2025 5:46:47 PM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Written Testimony for City Council Name: Hal Shepherd Hal Shepherd Email: Halshepherdwpc@gmail.com Phone: 9074911355

Residency: Non-City Resident City Council Meeting to Participate In: Regular Meeting Mon, 10/27 Public Comments Upon Matters Already on the Agenda - Citizen may comment on regular agenda items not scheduled for public hearing such as Consent Agenda items, Memorandums, Pending Business, New Business, Resolutions, and Ordinances to be introduced. Written Testimony: Dear City Council members:

The Kachemak Bay Watershed Council submits the following testimony regarding the Homer Comprehensive plan. The Plan needs to protect Open Space! Seventy-seven percent of the those commenting on the Plan over the past several years including the Watershed Council have said that it is

important to preserving open space from development in the Homer area is the number three priority after housing and year-round jobs. The Comp Plan should therefore, do more to meet this goal.

In order to meet the needs of the community in relation to the Plan please take the following actions:

- 1) Create a digital Future Land Use Map that shows unstable slopes, wetlands, bird and moose habitat, trees, creeks.
- 2) Tie those layers to a new "Low Impact Development" designation that indicates minimum footprint, height, setbacks around creeks, restrictions on cutting, filling, etc.
- 3) Identify lands the public wants to conserve, show them on the Future Land Use Map, and prioritize their purchase for public use.

Electronic Signature: Hal Shepherd, President KBWC Submitted on Monday, October 27, 2025 - 5:46pm The results of this submission may be viewed at:

https://www.cityofhomer-

ak.gov/node/60081/submission/53934

AMENDMENTS TO THE COMP PLAN 2045

To: City of Homer City Council

Suggested By: Charles Barnwell, City of Homer resident

Date: 10/27/25

The following in bold headers are the Amendment topics, followed by more description. More detail can be provided in comments provided in Planning Commission and Steering Committee comments in the past year.

AREA PLANS

Add these area plans as appendices to the Plan:

- Gateway district
- DCRA
- Woodard Cr watershed
- Downtown

EMERGENCY HAZARD MITIGATION PLANNING

- Add emergency planning language that discusses extreme event contingencies and planning.
- For example large earthquake/tsunami events
- Update hazard mitigation plan

PUBLIC FACILITIES

Add verbiage addressing water supply in Homer

Discuss need for protection of Bridge Cr. Watershed

Backup water supply discussion

1

LAND USE

Add a LID/suitability section. Follow on the 2018 Comp Plan Green Infrastructure planning.

Incorporate and expand on 2019 LID Study not only for green infrastructure approach, but land use management tool.

Discuss importance of peatlands, and incorporate 2019-2020 Drawdown mapping.

STORMWATER MANAGEMENT

Update Stormwater mgmt plan

Better use GIS. Develop technical mapping tools, including stormwater drainage (catchment) basins and flow paths, to guide City-led infrastructure decisions and support watershed-based planning.

Example text:

Using GIS tools to identify key areas of concern, develop policies and regulatory code that manages development in steep slope areas and minimizes erosion and runoff. Areas on Homer's bluff slopes are particularly susceptible to erosion leading to sediment runoff below and impacts on city stormwater drainage infrastructure. Mitigative measures such as use of wetlands, and green infrastructure techniques can be applied to areas being considered for development.

CITY GROWTH AND EXPANSION

Add discussion of growth of the City, and possible need for Annexation/city growth section

GEOHAZARDS

Add more explanatory section on steep slopes, soils, landslide risk

Reference DGGS, B. Higman work.

ECONOMIC

harbor expansion info should be in the Plan. Discussion of need for a Business Plan for this.

MAPPING

- 1. Mapping in the Comp Plan could be clearer and better done.
- E.g. 11x17 maps, separate thematic categories, e.g. geohzards, wetlands/peatlands, tsunami and flood potential.
- 2. Take advantage of COH GIS resources to help in providing more info on the Comp Plan; and as a tool in planning and management.

Memorandum

To:

Homer City Council

From:

Landa Baily, City of Homer Resident

Date:

October 27, 2025

Re:

Proposed amendments to Homer Comprehensive Plan.

Like you, I deeply value a robust, viable, thriving Homer and surrounding area that is economically strong with vibrant commerce.

I am grateful to you for your dedication to making sure Homer has a comprehensive plan and agree with you that comprehensive plans

Guide community development;

Balance competing interests in land use and development;

Protect public investments in public infrastructure and services;

Promote economic development;

identify and protect valuable environmental features including wetlands, open spaces and water supplies;

Foster community involvement and resulting community commitment to long term sustainability and successful economic development;

Formulate a strong legal basis for zoning and land use regulations, proving an objective basis for planning decisions.

Your addressing and setting forth clear and specific, measurable, achievable and relevant elements in the comprehensive plan pertaining to attainable and affordable housing *and* to short term rentals are key elements to the overall success of Homer's final iteration of its comprehensive plan.

First, attainable and affordable housing is more than housing security and housing insecurity; attainable and affordable housing is not just a social safety net. Attainable and affordable housing contributes to Homer's overall economic growth, job creation, employment stability, business development and retention, all ensuring long-term stability for the health care industry, our public education system, small and large businesses, local non-profit organizations, and our agricultural, tourism, and fishing industries and all the myriad businesses that support them.

Recommendation: Page 34: Include language from Strategy 1 Implement zoning reforms to encourage attainable housing development prioritizing housing solutions that cater to the needs of young people, families, seniors and seasonal workers, including:

Updating zoning regulations to support higher density and mixed-use housing developments to ensure attainable and affordable multi-family housing units;

1 Landa Baily recommendations for amendments to Homer Comprehensive Plan.

Promote compact and infill development to ensure denser housing development compatible with existing neighborhoods;

Regulate short-term rentals and their impact on all housing needs. Consider modifying the definition of short term rentals in the City of Homer code to lay the legal foundation for an objective basis for planning, regulation and management.

Second, short term rentals have a disproportionate impact on all housing markets, including attainable and affordable housing in/Homer.

Writing for the Cornell Journal of Law and Public Policy, two law professors who lecture on subjects including law, ethics, tax, and management, begin their law review article with the statement: "Cross disciplinary studies conclude that an increase in short-term rental (STR) units offered on platforms like Airbnb correlates with a decrease in affordable housing, both in terms of rents and home sale prices." Cornell Journal of Law and Public Policy, Volume 34:203-248. Short-Term Rental Regulations and Residential Housing Affordability.

Failure of STR regulation promotes the arguably defacto conversion of residentially zoned lots in Homer into commercially zoned lots when absent owners use their residential property for commercial purposes.

Further, the absent owners of STR impose the onus of noise, traffic, garbage management, and in some cases the impact of criminal behavior, on Homer residents and our governmental services. Conversely, owner-occupied STRS who reside in Homer live, vote, and volunteer and participate in myriad ways to enhance all the fabulous elements that make Homer not only a destination for STR customers but also for all Homer residents.

The current Homer City Code requires owner-occupied bed and breakfast establishments. The newer present-day vernacular of 'short-term rental' should be added to the current regulation to require on-site owner management. This requirement does *not* diminish the current tourist accommodations if the present non-owner short-term rentals are grandfathered in until such time as those residences are sold. That grandfathering aspect prevents speculative short-term rental buyers while at the same time preserving the residence on the residential market rather than on a commercial market. The internet is replete with "how and where to buy short-term rentals" and on one site Homer is listed as 'lenient' in regulation and enforcement. Residential owners have the right to expect their neighbors will use their property within the confines of the city's zones, that the city enforces its codes and zones and the right to expect they will not be impacted by out of compliance property owners.

Recommendation: Page 34. Add language that strategizes and implements regulation for short-term rentals.

Evaluate other existing gold standards for short-term rentals markets similar to Homer;

2 Landa Baily recommendations for amendments to Homer Comprehensive Plan.

With community-wide stake-holder involvement, draft language for appropriate regulations for the privilege of short-term rental permits that protect short-term and all other business sectors and promotes and protects the public safety and public interests of all Homer residents.

Recommendation: Page 33. Reinstate February 2025 Public Review Draft language, paragraph 2, page 42. "Tourism's influence on the Rise of Short-Term Rentals in Homer."

The Cornell Journal of Law and Public Policy law review article "Short-Term Rental Regulations and Residential Housing Affordability" (Vol. 34:203, pages 203 – 248), can guide you to fair, reasonable and workable short-term rental regulations to promote a housing market containing attainable and affordable housing to enhance and protect a sustainable economy in Homer.

Thank you.

Thank you for this opportunity to offer comments on the Comprehensive Plan update, Ordinance 25-64

My name is Karen Murdock. I reside at 55200 East End Road, outside of the city limits.

I have lived, raised a family, worked and volunteered in the Homer community since 1979. Even though I am not a city resident, the 2045 Comprehensive Plan will affect the quality of my life and all of those members of the greater Homer community.

I am questioning why the February 2025 Comprehensive Plan draft designated as a 10 year plan is now a 20 year plan in July 2025 draft. What was the process for changing February's 10 year plan to a 20 year one?

I would ask the Council to view and adopt the plan as a 10 year plan, not a 20 year plan. The world and our community is changing at an accelerated pace, faster than we could have anticipated a few years ago. There have been some major unexpected game changers to the Homer community in the last several decades....for example the Exxon oil spill, Covid, which have drastically affected our community. It does not seem prudent to commit to this plan as a 20 year timeframe. A ten year timeframe would provide a more realistic method to assess the progress of the goals outlined in the Comprehensive plan and align the goals with the ongoing needs of the community.

Thank you for all your work on the Comprehensive Plan and appreciate the consideration given to public comments.