Future Land Use map
- Environmental Constraints overlay
- Interactive ma

Memorandum

TO: Homer Planning Commission
FROM: Janette Keiser, PE
DATE: August 20, 2025
RE: Comments to Public Hearing Draft of new Homer Comprehensive Plan

1. **RE: Strategy (4)(a). Page 29**. This says we should support the use the Harbor Expansion, without qualifications. This makes it look like we're going to support this project whether or not it makes sense financially or environmentally. Recently, the Homer City Council was asked to identify their preference for a design alternative. Everyone expressed concern that they were being asked to do this without knowing more about the financial and environmental implications of the harbor expansion project. I suggest this language be changed to something like, *"continue to explore the financial, operational and environmental consequences of the Harbor Expansion Project..."*

2. **RE: Strategy (1)(a) and (b). Page 41.** This says we should "*invest in infrastructure that supports growth in key sectors*" but the only actions regarding incentives relates to the marine trades and the Homer Spit. This denigrates the contribution of other industries in Homer, such as health care, small scale agriculture, the arts, sports and even home-based businesses. There should be language that manifests Homer's commitment to fostering a broad range of other key sectors of economic opportunity, besides the marine trades.

3. **RE: Transportation. Page 47**. The Homer Transportation Plan identified other transportation needs, besides improving non-motorized connections to schools. There should be an action that says "implement the recommendations of the Homer Transportation Plan". Likewise, there should be a reference to the KPB's recently adopted Safety Action Plan, which identified policies and projects to improve traffic safety in Homer.

4. **RE: Sales taxes. Page 53.** This language states that Homer is dependent on sales tax as a primary revenue source. This is true. It is also somewhat scary. The HART Fund, which is built on sales tax, is scheduled to sunset in 2027. The voters will

need to pass a new proposition to keep this tax in place. Some people will want to use this opportunity to reduce their taxes. But, this fund is what pays for Homer's road maintenance. Without the sales tax, this fund will evaporate and Homer would be in deep do-do. I'd like to see a cautionary note about this added to this section, if only as an example of how dependent we are on sales tax.

5. **RE: Partner-led Strategies.** There are many places were "*Partner-led Strategies*" are identified. There's a description of what this means on Page 14. And, Appendix I provides more detail about what actions are recommended. I like the strategies and actions, but the City's role is not clear. It looks like the City is a passive by-stander. I'd like to see the City's role defined more clearly, and preferably, in a leading role or at least, as a key stakeholder invested in proactive collaboration to create positive outcomes.

Kachemak Bay Watershed Council

The Kachemak Bay Watershed Council facilitates communication, planning, advocacy, and restoration to protect, steward, and revitalize the Kachemak Bay Watershed to ensure the sustainability and integrity of natural and human communities for future generations.

Homer Planning Commission
planning@ci.homer.ak.us.

The Kachemak Bay Watershed Collaborative
City of Homer 2045 Homer Comprehensive Plan: Public Hearing Draft, July 2025 Comments

August 20, 2025

Dear City of Homer Planning Commission:

The Kachemak Bay Watershed Collaborative (KBWC) is a non-profit conservation organization focused on applying data and information related to climate change, land uses and other environmental impacts, to inform policy makers and agency planners regarding management of Kachemak Bay on a watershed basis. The current version of the City of Homer Comprehensive Plan (Plan), is an improvement over past versions regarding strategies for addressing the increasing number and level of intensity of climate change and development can present to human health and welfare, water infrastructure and critical fish and wildlife habitat challenges the City will face in the 21st century.

The Nation's water supplies and services are at risk. Climate change, growing income disparities, and the threats posed by aging water infrastructure and impacts to fish and wildlife call for an increased focus on the use of ecosystem services and the need to manage watersheds on an ecosystem bases rather than a piecemeal approach to water management. In order to avoid the problems of the lower 48, Alaskans must come together and create a new era of water management that secures economic, environmental, and community wellbeing. To this end,

across the state stake holders are collaborating and innovating to advance sustainable water management solutions. Through the Comprehensive Plan, the City of Homer (City) has an opportunity to spread and scale up these efforts to benefit communities and watersheds within and outside City boundaries.

The Plan therefore provides a good jumping off point for the City to engage in Integrated Water Resource Planning (IWRP) and nature-based solutions including planting trees to replenish forests, reconnecting rivers to floodplains, and restoring wetlands, is a sustainable and cost-effective way to help rebalance the water cycle, mitigate the effects of climate change and improve human health and livelihoods.

To this end, KBWC specific comments include the following:

I. Governance

Under this section, KBWC is encouraged by the Plan's listed "Potential Partner-Led Strategies" including to "[i]dentify opportunities to coordinate with organizations including Tribal organizations, Alaska Native Corporations, and local and regional non-profits to leverage resources and provide services more cost-effectively." (Plan p. 16). To this end, we recommend that the City work with the above organizations to develop an Integrated Water Resource Management that includes the following components:

a) IWRM Plan

Watersheds have always been essential to protection of fish and wildlife habitat and water infrastructure. They are a source of biodiversity and fresh water. They reduce risks of natural disasters like landslides and flooding. They act as a carbon sink, removing carbon dioxide from the atmosphere and storing it, thus mitigating climate change. They make an essential contribution to food security by helping to maintain the environmental conditions needed for fishery production. They stabilize the soil, prevent erosion, enhance the land's capacity to store water, and moderate air and soil temperatures. As sources of raw material, biomass, renewable energy, and nontimber products, watersheds support rural communities. Many rural and indigenous people depend on watersheds for their livelihoods which also enhance well-being by providing recreation and amenity values.

As means of protecting watersheds and water infrastructure that cities and towns rely upon, from the impacts of climate change, the City could create an Integrated Water Resource Management Plan (IWRMP) which is "a process that promotes the coordinated development and management of water, land and related resources, in order to maximize the resultant economic and social welfare in an equitable manner without compromising the sustainability of vital ecosystems." Global Water Partnership Technical Advisory Committee (2000).

The City should collaborate with other federal, state, tribal, local, research, conservation and other stakeholders to apply IWRMP criteria including consideration of these factors: 1) Manage water sustainably; 2) Balance economics, social equity, environment; coordination and integration; participation from all water sectors; 3) Holistic management of connected resources; 4) Process oriented adaptive management; 5) Enable environmental policies and resources; and 6) Institutional roles and capacity. As an example of how to protect fish and wildlife resources from the impacts of climate change is to take measures to mitigate warming stream and related temperatures. For example, growing willows and other trees close to the banks of streams and rivers; providing shade over the water and creating in-stream habitats made of logs under which fish can cool off when things heat up. (See the Nooksak Tribe of Washington State Salmon Habitat research projects http://www.yesmagazine.org/people-power/threat-of-salmon-extinction-turns-small-tribe-intoclimate-researchers-20160906).

b) IWRM Tools

An example of a tool that the City could use in an IWRM strategy is the EPA's Watershed Optimization Management Support Tool (WMOST) which is a publicly available tool that can be used by state and local managers to screen a wide-range of options for cost-effective management of water resources. It supports a broader integrated watershed management (IWM) approach by allowing the user to simultaneously consider stormwater, drinking water, wastewater and land conservation management practices. Users can select from three versions of WMOST based on their specific management needs. (http://www.epa.gov/exposure-assessment-models/wmost). The first version focuses on management of base and peak flows, the second adds a flooding module to assess costs associated with peak flows, and the third includes a water quality module. WMOST aids in evaluating the environmental and economic costs, benefits, trade-offs and co-benefits of various management options, and can facilitate the evaluation of low impact development and green infrastructure management options that are suitable for projects using State Revolving Funds.

Currently, this tool is being used primarily by state agencies and counties in the lower 48 for cost-effective stormwater management practices for meeting the management goals of a typical community in their state and consortiums of communities, regional development commissions, and non-governmental and watershed organizations to determine the most cost-effective options to meet water quality goals (such as TMDLs), water quantity targets (maintaining base flows and water supplies), reducing flooding and impacts of Combined Sewer Overflows, and supporting land conservation goals under both current and future growth and climate scenarios.

II. Sustainability and Resilience

Under Goal A of this section the Plan proposes the maintenance of "Open Space and Natural Lands" in order to "Support Long-Term Community Well-Being" by protecting "both existing and new infrastructure from the impacts of climate change, environmental constraints, and hazards," modernizing "City operations for long-term efficiency and resilience and reducing "risk from natural hazards through proactive siting and planning." (Comp Plan page 17).

To this end KBWC recommends that the City of Homer update its current Climate Action Plan (HCAP). (See, Ibid at 59). The City developed the HCAP almost 20 years ago that includes the

requirement that the city: 1) develop management plans specific to Port and Harbor facilities on the Homer Spit (construction, maintenance, dredging, etc.) that take into account climate change impacts; and 2) taking climate change into consideration in all long-range planning efforts (e.g., transportation, land use, Homer Spit, emergency management, economic development). In addition, there is currently no comprehensive climate change adaption plan addressing the Kachemak Bay Watershed that includes the City of Homer. After adoption of the HCAP, the Plan states, [t]oday, the community continues to express strong support for renewable energy, hazard mitigation, and environmental stewardship." (Ibid).

Therefore, in order to implement the standards in the current Climate Action Plan, the assessments of the potential impacts of development activity needed to include full consideration of all of its potential impacts. Updating the HCAP, is also an opportunity for the city to join the ongoing climate change conversation in Homer led by the KBWC and other stakeholders who have been discussing priority climate related projects for planning, management and protection of both freshwater and marine ecosystems within the Watershed.

Finally, KBWC has identified federal funds that could be used in planning and development of harbor infrastructure. These include grant program funding for watershed related ecosystem resilience projects from the Inflation Reduction Act and the Bipartisan Infrastructure Act. To this end, the Watershed Collaborative is currently, updating the attached Kachemak Bay Fox River Climate Risk Assessment completed in 2019 that would result in a Resiliency Plan and would incorporate the projects for planning, management and protection of both freshwater and marine ecosystems within the Watershed. We would like to work with the City to co-develop such a plan as part of updating the HCAP and to partner with the Collaborative to seek funding to complete such plan.

III. Land Use and Environment

Under this section, KBWC supports the need to "Modernized Zoning is Essential for Attainable Housing, Safety, and Future Growth" due to the fact that "Homer's current land use regulations no longer reflect the community's development needs or values. Residents have called for more attainable housing options, greater consideration of natural hazards, and updates to zoning

standards that align with infrastructure availability and environmental constraints." (Comp Plan Page 15).

In addition, approximately 35 percent of Homer's land base includes wetlands, steep slopes, or critical habitat that limits development feasibility and increases hazard exposure3. Residents want code updates that allow for more flexibility in building types, incentivize infill and redevelopment in appropriate areas, and ensure that private and public development considers runoff, slope stability, and infrastructure capacity. (Ibid).

A good example of this concern is the City of Homer's Planners have recommended approval of a preliminary plat to subdivide existing parcels into 10 lots within The Woodard Creek Watershed. This would allow for a 22-acre subdivision to go forward which would be inconsistent with the Woodard Creek Watershed Plan because it will disturb a large wetland 'holding tank' of water. Woodard Creek is Homer's most prominent perennial stream, and it has a rich history as an early settling place for homesteaders seeking year-round water supply. The upper watershed, Woodard Creek is confined in Woodard Canyon, a steep-sided valley some 300 feet deep. Downstream, the creek remains confined in a valley approximately 20 feet deep, becoming shallower in some areas due to historic human activities. The final mile of Woodard Creek flows through a municipal park and some 45 residential and commercial properties before flowing to Kachemak Bay at a beach front bluff.

IV. City-Led Strategies and Actions

The Plan calls for implementation of a Future Land Use Map that guides future decisions about land use and growth" that would include the following categories:

a. **Open Space Recreation** - Public lands with uses that promote public recreation and access opportunities while preserving the natural and scenic resources of the areas.

b. **Conservation** - Public and private lands that serve key environmental functions, such as critical habitat or watershed areas, to be maintained in an undisturbed and natural state.

c. **Environmental Constraints** - Known areas of environmental constraints, such as critical habitat and steep slopes, to help identify places where more detailed site analysis may be warranted if areas are to be developed or improved.

d. Flood zones, coastal bluff instability, scarps, hydric soils, key watersheds. (Comp Plan page 18).

A key element of such implementation will be to manage watersheds within and outside of the city limits on an ecosystem wide rather than piecemeal jurisdictional bases. In addition to 5 municipalities, the Kachemak Bay Watershed includes jurisdictional boundaries for the federal government, the state and others. Individual management of these lands by different agencies has led to much resource protection and proper management of such resources to fall through the cracks. The Plan is therefore, a good a starting point for the City to work with other land management entities on a watershed basis to protect the entire Watershed. This includes the development of an IWRMP and updated the City of Homer's Climate Action Plan.

V. Strategically align development regulations with natural hazard risks and land suitability to support safe, resilient, and responsible growth.

Under this section the Plan lists the following actions:

a. Use the City of Homer Hazard Mitigation Plan to inform updates to zoning and development codes, ensuring land use decisions reflect the latest risk assessments;
b. Clarify zoning procedures and criteria for rezoning reviews to ensure consistency with the comprehensive plan and hazard mitigation goals;
c. Update development standards for steep slopes, drainageways, and erosion-prone areas to manage grading, erosions, runoff, and vegetation clearing. Encourage the use of green infrastructure and site-responsive design solutions to improve drainage and reduce hazard exposure;
d. Strengthen stormwater and erosion control provisions in City code, incorporating green infrastructure techniques—such as vegetated buffers and infiltration features—to reduce coastal bluff erosion and other site-based hazards;
e. Consider expanding the range of conditions that may be applied to Conditional Use Permits to address riparian protection, soil stability, wetland preservation, and related site concerns. (Comp Plan page 22).

One of the best ways to implement these actions is for the City to update it's Climate Adaption Action Plan to broaden coverage of these actions and include standards for implementing them.

VI. Protect and enhance green space in Homer to support habitat connectivity, recreational access, and community well-being

One of the best means of maintaining habitat connectivity is for the City to work with other federal, state and tribal entities to manage Watersheds both within and outside of city limits on an ecosystem rather than jurisdictional basis. Because fish and wildlife travel and subsist over a broad range of land and water, proper management of habitat should not observe jurisdictional limits. In addition:

Homer's ecosystems, wetlands, and green spaces provide natural protection against flooding, erosion, and other hazards—while also contributing to the community's quality of life. Residents strongly support preserving these natural assets: 77 percent of community survey respondents identified the preservation of public open space as a top priority. In open responses and interviews, residents expressed support for concentrating new development in existing disturbed areas, avoiding steep slopes and flood-prone zones, and protecting wildlife corridors and critical habitat. Preserving wetlands, riparian buffers, and upland vegetation also enhances Homer's capacity to manage stormwater through low-impact development and natural drainage systems.

Due to the impacts of climate change on the once biologically productive Kachemak Bay Watershed, one of the primary tools left to protect and restore the Watershed's ecosystem is through mitigation of lands use and development impacts on aquatic ecosystems that affect connectivity. (Comp Plan page 60).

VII. **Advance place-based planning and development that supports Homer's unique community character, encourages targeted infill, and strengthens Homer's role as a regional**

The Plan calls for "Lead area planning efforts for the Spit and downtown core [that] should address land use, infrastructure needs, environmental hazards, economic development, and recreational access." (Comp Plan Page 23). Once again, the updating of the City of Homer Climate Action Plan including the results of KBWC's MPARVAT would be the best means of achieving this goal.

CONCLUSION

The challenges the City faces today require it to adopt watershed wide solutions for greater efficiency, improved water quality, sustained regulatory compliance, and critical habitat protection. There are a wide variety of collaborative approaches that can work and many policy levers to help expand their adoption. Partnering with neighbor communities and other organizations to meet common needs makes sense, and we collaboration will take greater hold as more communities demonstrate their power to improve water management for all. In addition, there are funding mechanisms that would assist in achieving these goals. Finally, an Integrated Water Resource Management strategy would reduce flood risk and storm damage and help protect habitat and drinking water resulting in additional long mitigation of the impacts of climate change.

Please contact me at (907) 491-1355; halshepherdwpc@gmail.com if you have any questions regarding these comments. Thank you.

Sincerely,

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