



City of Homer

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Planning

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Memorandum

Agenda Changes/Supplemental Packet

TO: PLANNING COMMISSION
FROM: ZACH PETTIT, DEPUTY CITY CLERK II
DATE: AUGUST 20, 2025
SUBJECT: SUPPLEMENTAL

8. PUBLIC HEARINGS

8. A. A REQUEST TO VACATE THE 66-FOOT-WIDE SECTION LINE EASEMENT ACROSS LOT 2 ARNO SUBDIVISION, T 6S R 14W SEC 13 SEWARD MERIDIAN HM 2001078 ARNO SUB LOT 2 THAT PORTION LYING INSIDE HOMER CITY LIMITS, KNOWN AS 1145 DIAMOND RIDGE RD, STAFF REPORT 25-37

1. SLE Vacation – Topography 5’ Intervals **Page 3**

2. SLE Vacation Lot 2 Arno Subdivision – Topography with Elevation Profile

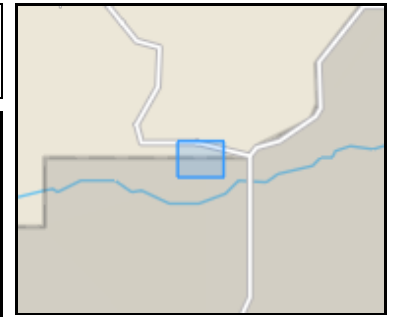
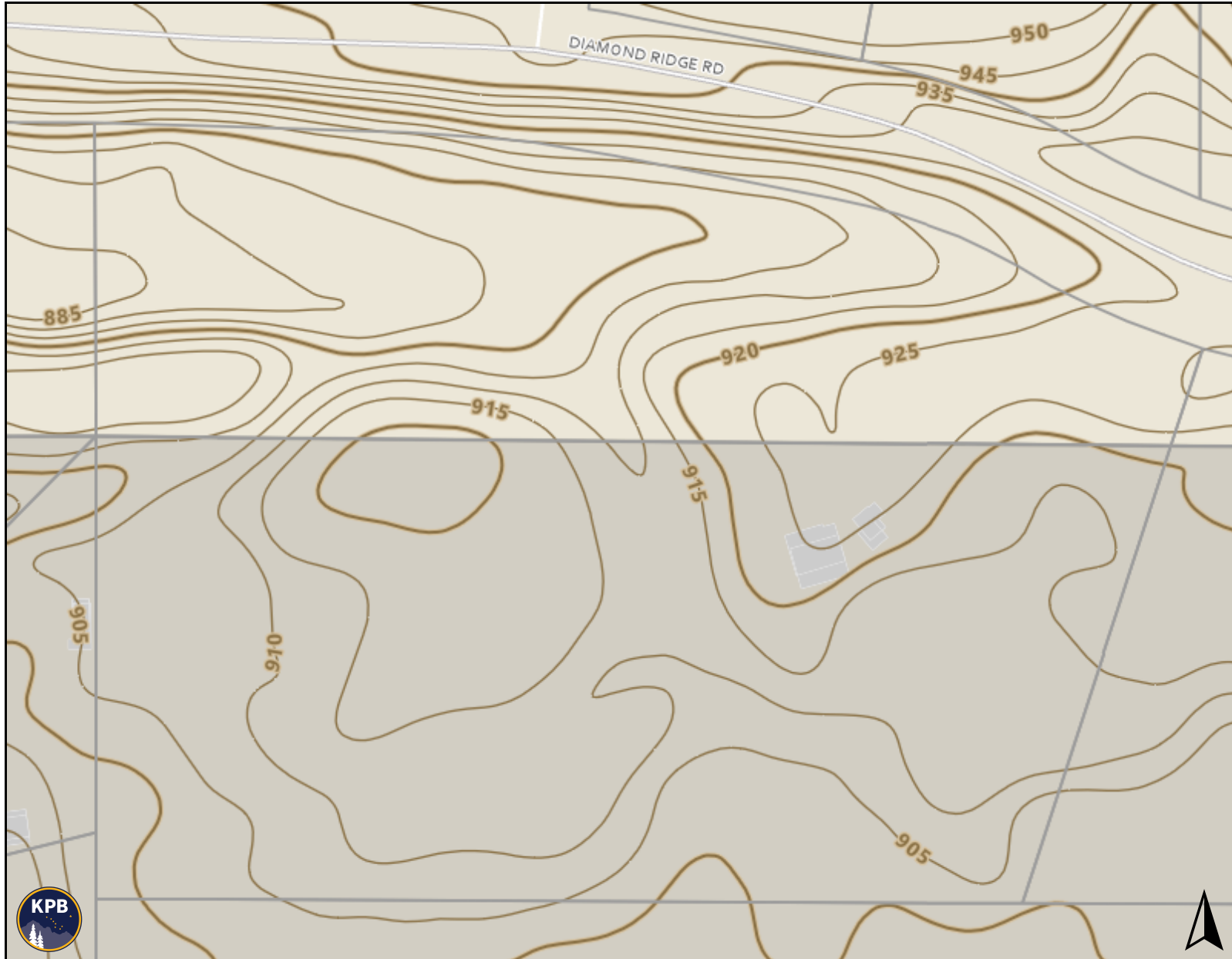
Page 4

8. B. AN ORDINANCE OF THE HOMER CITY COUNCIL ADOPTING THE 2025 HOMER COMPREHENSIVE PLAN AND RECOMMENDING ADOPTION BY THE KENAI PENINSULA BOROUGH, Memorandum PL 25-038

1. 2045 Homer Comprehensive Plan Update Slideshow **Page 5**

2. Public Comments Received

Page 25



Legend

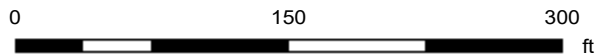
Transportation

Mileposts



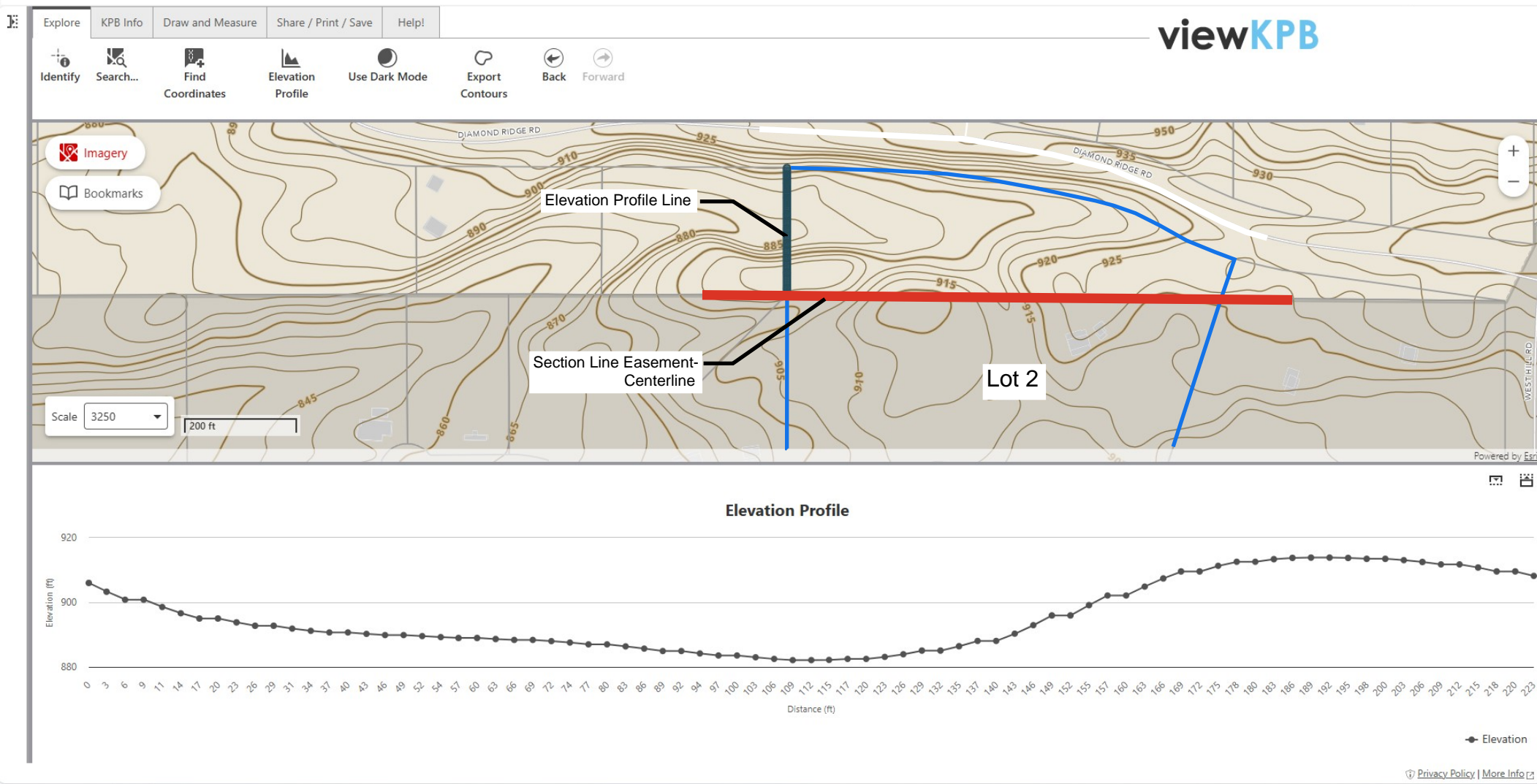
Parcels and PLSS

Tax Parcels



NOTE: Every reasonable effort has been made to ensure the accuracy of these data. However, by accepting this material, you agree that the Kenai Peninsula Borough assumes no liability of any kind arising from the use of this data. The data are provided without warranty of any kind, either expressed or implied, including but not limited to time, money or goodwill arising from the use, operation or modification of the data. In using these data, you further agree to indemnify, defend, and hold harmless Kenai Peninsula Borough for any and all liability of any nature arising from the lack of accuracy or correctness of the data, or use of the data.

SLE Vacation Lot 2 Arno Subd. - Topography with Elevation Profile



2045 Homer Comprehensive Plan Update

Public Hearing
City of Homer Planning Commission
August 20, 2025

Agenda Item Overview

Agenda Item Overview

- **Timeline and process** of draft plan to date and going forward
- **Key elements** of the plan
- **Review top themes** from drafting process and how the hearing draft responds
- **Planning Commission's role** today



Timeline and Process

Phase 1 and Phase 2 Timelines

Phase 1: Comprehensive Plan Update



The Title 21 Update builds from the Comprehensive Plan Update

Phase 2: Title 21 Update

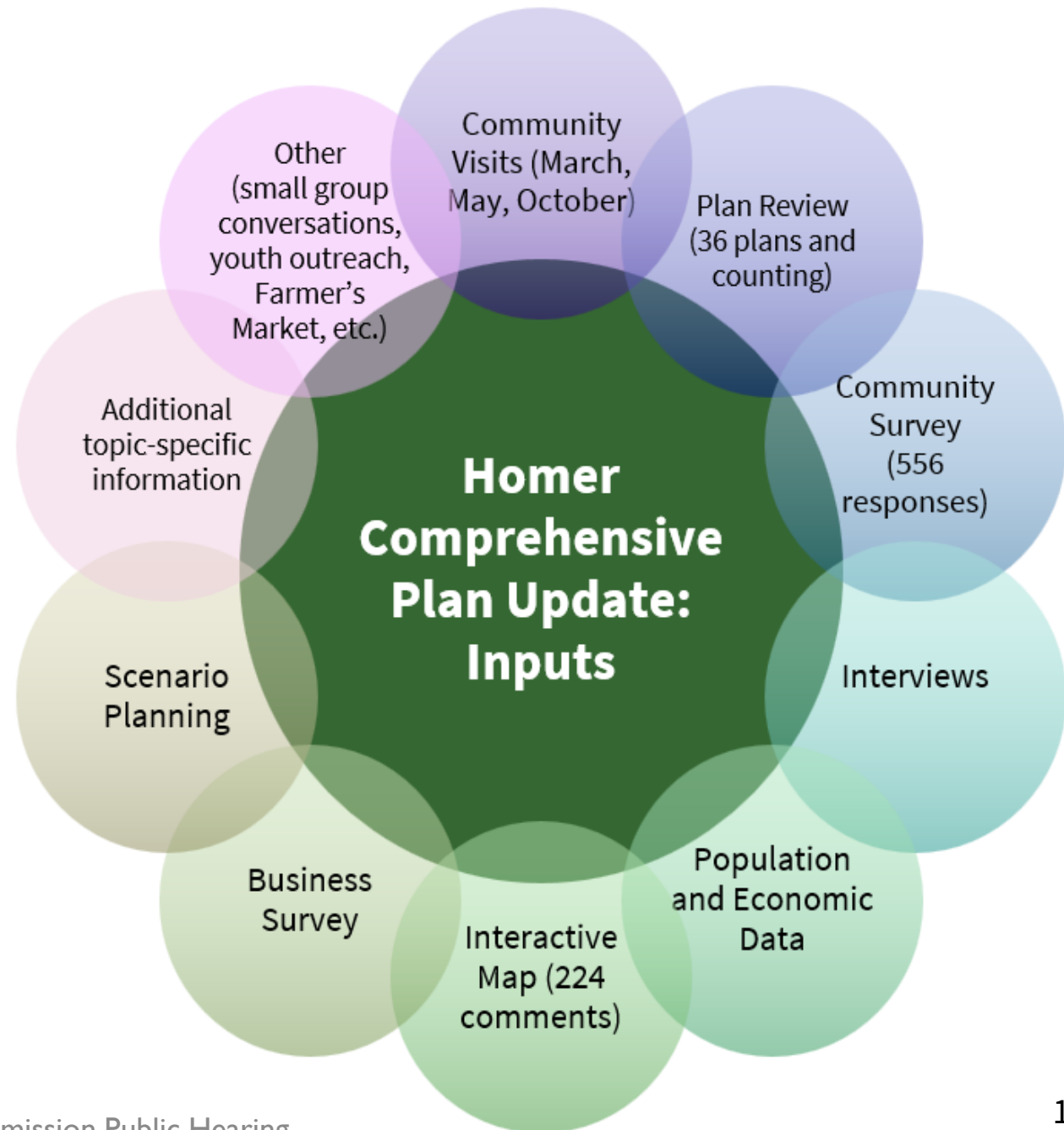


Process

Shaped by over a year and a half of outreach, research, and collaboration.

Every step — from scenario planning to topic-specific research, from workshop to workshop— has brought us to this August 2025 public hearing.

*More information in Appendix C:
Methodology*





March 2024



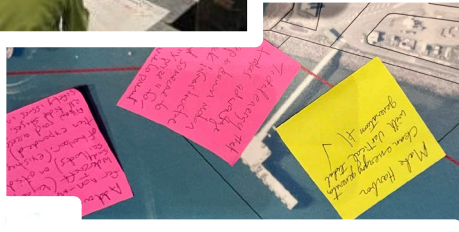
**40 Under 40
May 2024**



**Growth Scenarios
October 2024**



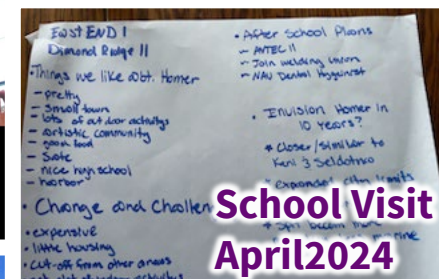
**Open House
February 2025**



**PC Work Session
April 2025**



**Steering Committee
February 2024**



**School Visit
April 2024**



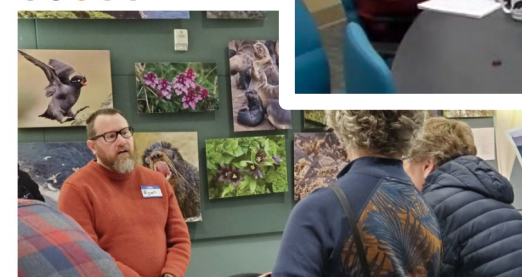
**Builders Day
March 2024**



**Library Open Hours
May 2024**



Tags: City of Homer, Homer, Local News, Planning



**66 sets of comments
on the Public
Review Draft**

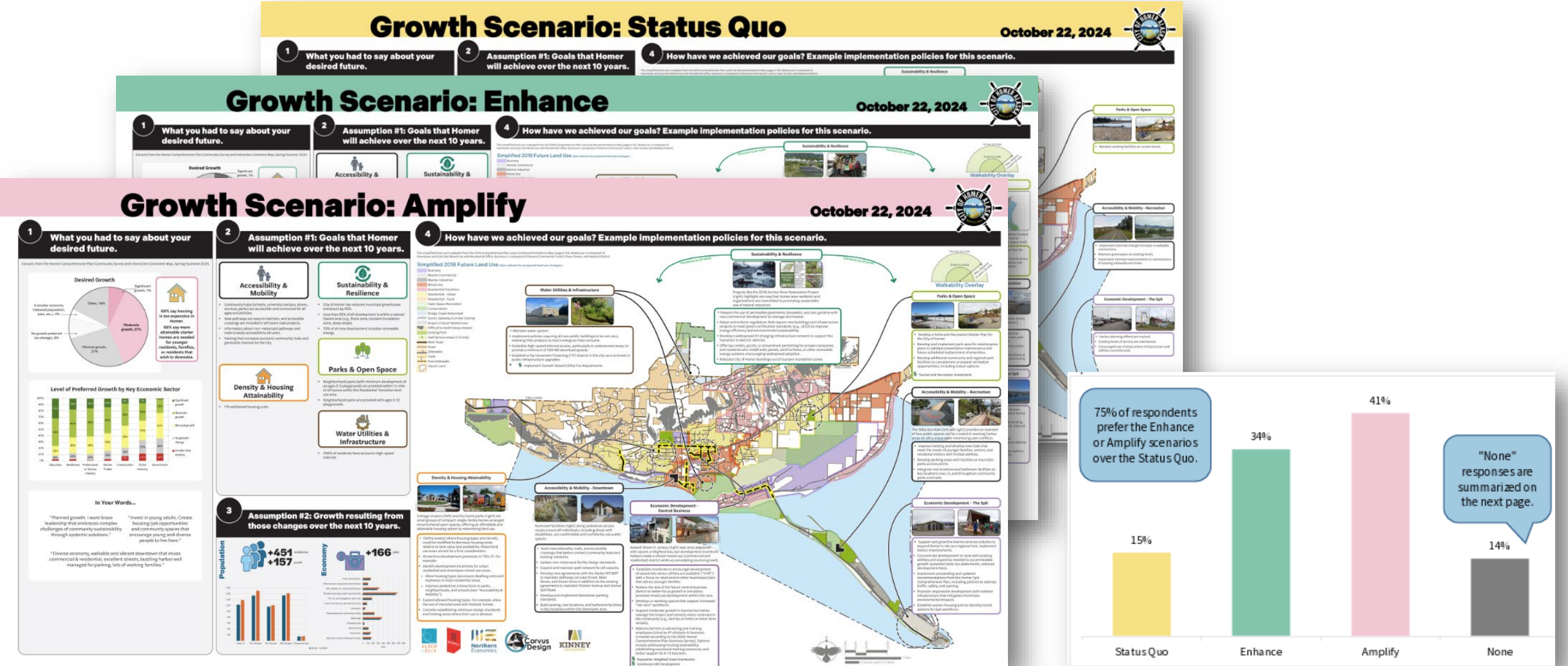
**Meetings with all
City Boards and
Commissions**

**Over 10 Steering
Committee
meetings**

Elements of the Plan & Development

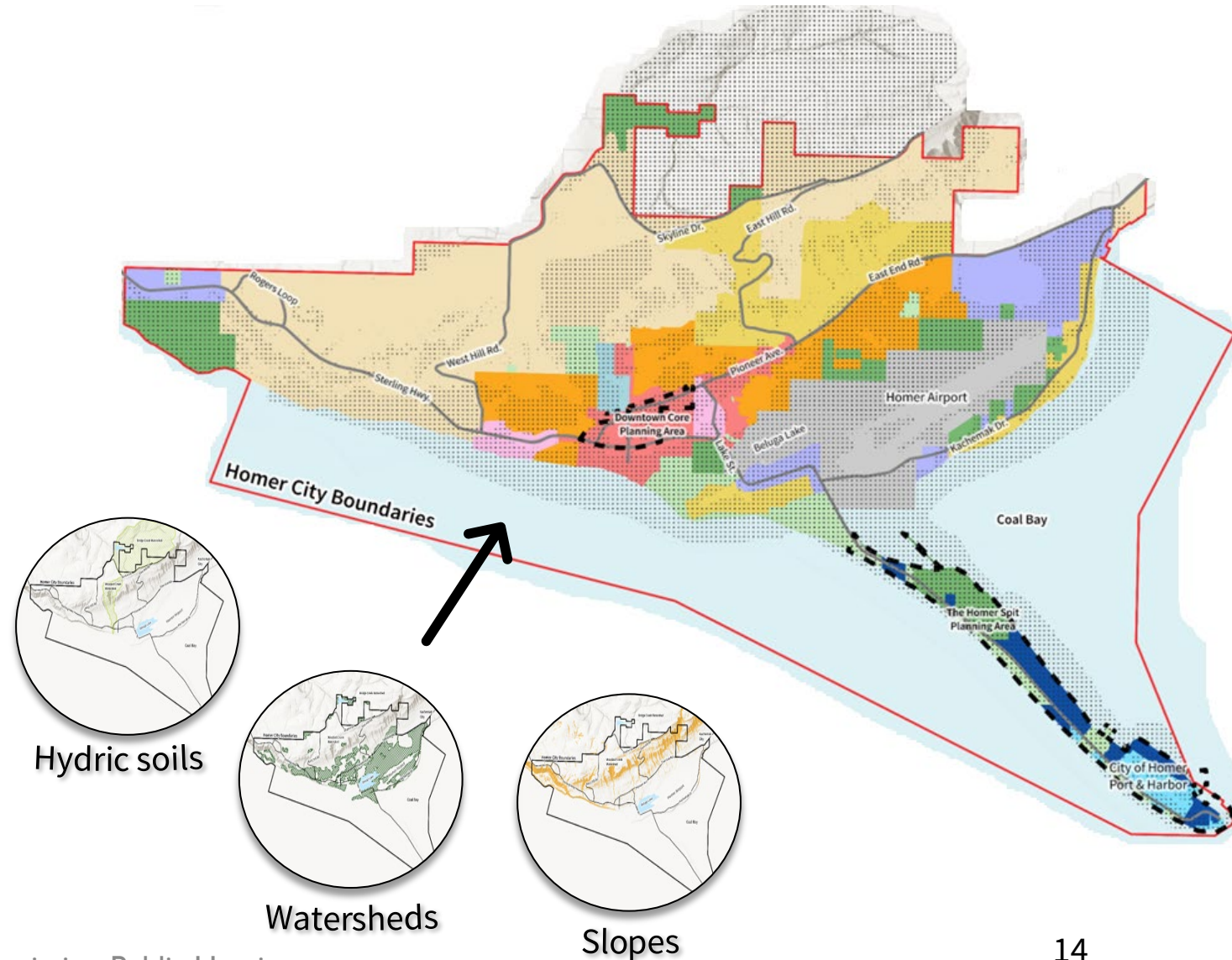
This plan is unique!

Element: Growth Scenarios



Element: **Future Land Use Map**

- Addresses limited developable land
- Relates to housing constraints
- Connects to Sustainability and Resilience Chapter



Element: City and Partner Strategies

Appendix I

Partner-led strategies and actions for all chapters

City-Led Strategies and Actions			
Icon Key: ✓ Priority: Emerging priority for implementation ✗ Capital: An action that includes a potential capital project ✳ Code: An action that recommends a specific code revision ◆ 2018: An action adapted from/carried over from the 2018 Comprehensive Plan			
1. Invest in infrastructure that supports economic growth in key sectors. ✓			
Action	Who	Estimated Costs	Target Timeframe
a. Incentivize growth of the marine trades in Homer to expand services offered locally, create jobs, support fishing, increase the City's taxbase, and reduce the need to travel to other areas of Alaska and the Pacific Northwest. ✗ ✳	Community Development Department, Planning Commission, Economic Development Commission, Port and Harbor Advisory Commission, Port and Harbor Department	Undetermined	Ongoing

Economic Development Potential Partner-Led Strategies	
4. Support Homer's youngest residents and their families by making sure they have what they need to grow and thrive, including access to child care. ✓	
a. Ensure quality childcare is accessible and affordable, with parents and caregivers easily able to connect with available childcare resources and programs.	
b. Promote a healthy lifestyle by increasing activities available for youth.	
c. Promote volunteer and education opportunities for youth to become involved in civic life and contribute to improving the community.	

Excerpts from Economic Development Core Chapter and Appendix I

Element: City and Partner Strategies

City-led	Partner-led
<ul style="list-style-type: none">• City-led strategies include actions in the Core Plan• Priority City-led strategies include action plans	<ul style="list-style-type: none">• Partner-led actions included in Core Plan• Potential actions for partner-led strategies are in the appendix

City-Led Strategies and Actions			
Icon Key: <ul style="list-style-type: none">✓ Priority: Emerging priority for implementation✖ Capital: An action that includes a potential capital project* Code: An action that recommends a specific code revision◆ 2018: An action adapted from/carried over from the 2018 Comprehensive Plan			
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Excerpts from Economic Development Core Chapter and Appendix I

Element: Implementation Plan (Appendix J)

Public Facilities and Services Action Plan

See Appendix A for a list of acronyms.

Funding Public Facilities and Services Priorities: To support implementation of strategies and actions in this section, see potential funding opportunities B, G, I, K, M, N, O, P, Q, R, V, Y, Z.

Icon Key: ✖ Capital Project | ✱ Code Revision | ♦ Action Carried Over from 2018 Comprehensive Plan

Strategy 1. Provide safe, year-round public facilities for residents of all ages and abilities.

Action	Who	Estimated Costs	Target Timeframe
a. Maintain the library as a thriving community space for learning and connecting, including assessing the library’s anticipated need for growth and improvements over the next decade and planning for upgrades. ✖	Library Advisory Board, Library Department, Information Technology Department	Remodel engineering study: \$75k (FY26 CIP)	Ongoing

A. Alaska State Capital Project Submission and Information System (CAPSIS)

Funder: Alaska State Legislature; Must contact Alaska State Representatives to begin the process.

Relevant Chapters: Land Use and Environment, Public Facilities & Services, Housing, Economic Development, Transportation, Sustainability and Resilience

Award Information: Amounts range. Recent trail and recreation projects have received between \$1 and \$6 million.

Eligibility: State, locality, or Congressional district

Description: The Alaska State Capital Project Submission and Information System (CAPSIS) is the system that allows organizations to submit funding requests for capital projects to their legislators for consideration and approval.

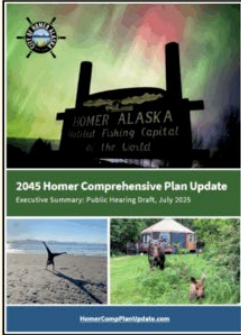
Due Date/Frequency: Annual; Contact Homer State Representatives in the fall to begin process.

B. Coastal Program FY25

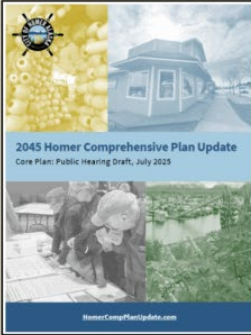
Relevant Chapters: Land Use and Environment, Sustainability and Resilience

Funder: U.S. Dept. of the Interior (DOI), Fish and Wildlife Service (FWS)

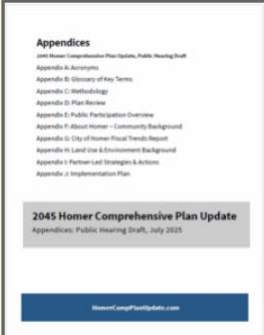
Element: Plan (Phase I) and Code Revisions (Phase 2)



Executive Summary
(3 MB)



Core Plan
(8.9 MB)



Appendices
(10.1 MB)

Table 4: Future Land Use Designations and Potential Changes to Zoning Districts

Future Land Use Designation	Corresponding Zoning District	Potential Change
Commercial		
Downtown Mixed Use	CBD – Central Business District Town Center	Consider consolidation of CBD and Town Center Districts
Commercial Mixed Use	GBD – Gateway Business District	Potential renaming to Commercial Mixed Use
Marine Commercial	MC – Marine Commercial	No change required
Residential		
Urban Residential	UR – Urban Residential RO – Residential Office	Redesignate Residential Office to Urban Residential (or edit permitted uses in the districts).
Transition Residential	RR – Rural Residential	New Zoning District – Transition Residential
Rural Residential	RR – Rural Residential	No change required
Medical Mixed Use	M – Medical	Potential renaming as Medical Mixed Use



Response to Feedback

Response to June Joint Work Session

What We Heard	Response
Future Land Use Map difficult to read	Published interactive Future Land Use Map; package as 11x17 in final plan
More details on funding research and Council role in Implementation Plan	Added greater detail to Appendix J
Point-in-time data in Core Plan is no longer most current	Added direction to find current data releases
Split out population projections for communities near Homer	Added breakdown of population projections for each neighboring community
Missing harbor expansion efforts	Added related policies in the Public Facilities and Services Chapter

Responsive to City Leadership

What We Heard – Desired Plan Features	Response
Relevant to City of Homer, its responsibilities and fiscal reality, and responsive to the federal landscape	Implementation Plan, elevated City-led strategies
Accessible and user-friendly	Core Plan, Title 21 Process
Flexible and adaptable to rapidly changing circumstances	Implementation Plan, FLUM
Constructed from extensive community representation and feedback	Robust outreach efforts, extensive community comments, Growth Scenarios activity
Mindful of the workload of City staff and be realistic when preparing action items	City-led strategies, 20-year Implementation Plan

“The comp plan cannot overlook the “day to day” responsibilities of the City and community, the infrastructure that needs to be maintained. Even if these goals are mundane, they are important.”

– April 2024 Joint Planning Commission/City Council Meeting

Commission's Role Today

Planning Commission's Role Today

- **Hear and consider** written and in-person testimony on the Public Hearing Draft.
- **Balance public hearing input** with what's been learned throughout the planning process from various other inputs (April + June workshops, comments, open houses, survey, analysis, etc.)
- **Keep in mind:** this is a 20-year vision that will guide—but is separate from—the Title 21 Code Update.
- **Decide** whether to:
 - Recommend any changes to the Draft.
 - Recommend adoption to City Council.

Potential Amendments List (A):

From staff:

1. In the Executive Summary (page 4), add “Increase access to recreational opportunities for visitors and residents” to list of top priorities.

Top Priorities and Projects for Homer to Focus on for the Next 10-20 Years

- Increase supply and accessibility of affordable housing
- Encourage the retention and creation of more year-round, higher wage jobs
- Preserve open public spaces within the city from development
- Create a livable, walkable, vibrant downtown
- Encourage renewable energy projects

*Identified as “important/
very important” by 74% or
more of survey participants.*

MEMORANDUM

TO: Homer Planning Commission
FROM: Janette Keiser, PE
DATE: August 15, 2025
RE: Comments on 2045 Homer Comprehensive Plan Update – Public Hearing Draft

I reviewed the Public Hearing Draft (“PHD”) , dated July 2025, of the new Homer Comprehensive Plan, comparing it page by page with the Public Review Draft (“PRD”) dated February 2025. The purpose of this Memorandum is to point out areas where the PHD is different from the PRD and to request that the earlier language, which is sometimes more descriptive, be added.

1. RE: Formatting issues:

- a. There needs to be a Cover Page, with the Table of Contents immediately after that, identifying, among other things, the page numbers where the Executive Summary and the body of Plan starts.

2. RE: Public Outreach Events. The PRD had a Figure 4, Page 10, which listed all the public outreach events that were held to collect input about the plan. This was important information because it showed the City’s efforts to include a broad range of opinions. The PHD does not include this figure. Was it put someplace else?

3. RE: Natural hazards. The PRD, Page 18, contained a nice paragraph entitled “*Development that fits Natural Conditions*”. The only part of this paragraph that appears in the PHD is the first sentence. Please put the rest of the paragraph back as it is important to remind people that natural hazards restrict growth and development on much of Homer’s lands.

4. RE: Gaps. The PRD, Page 19, contained some nice language about the “*gaps*” in outdoor areas, which is omitted from the PHD. This was good language – please put it back.

5. RE: Future Land Use Map. I suggest the explanation about what a *Future Land Use Map* is be moved from Page 19 to Page 17, before Figure 7.

6. **RE: Future Land Use Map.** This map would be more helpful, if the outlines were more distinct; that is, if the outlines followed property boundaries. Without clear boundaries, the Planning Commission is just guessing about which designation applies to specific parcels. This is particularly important when talking about the Environmental Constraints Overlay. If you can't identify boundaries, maybe you can identify some criteria – some tool the Planning Commission can use identify if a property is supposed to be in the EC Overlay or not.

7. **RE: Land Use.**

- a. The PHD, Page 21, contains Strategy (2), which includes a list of Actions. One of them is “(g) *gauging community and stakeholder support for zoning and policy tools....*” This sounds wishy-washy. Please delete the words about “*gauging...interest*” and substitute the phrase “*research and implement zoning and policy tools....*” Obviously, implementation can't take place without community support, so community support, or lack thereof, for such tools will manifest itself during the implementation process. Thus, it's ok to state this strategy more assertively.
- b. The PRD, Page 24, included an additional strategy (g) about “*adopting building codes and incentive programs to increase energy efficiency and promote renewable energy*. Please add something to the PHD that addresses these important topics if only to refer to the city's Climate Action Plan.
- c. The PHD, Page 21, includes Action (h) which refers to “*locally owned and emerging industries*”. Please define “emerging industries,” so we know what we're supposed to support. Also, this would be a good place to add “*agricultural and other food production industries.*”
- d. The PHD, Page 22, includes a Strategy (3) to “*strategically align development regulations with natural hazards and land suitability...*” The PRD contained a number of Actions (b) – (f), that are not contained in the PHD. That was good language – please put it back.

- What's currently in the PHD is good, but it needs to be buttressed with the original language of this section.
- e. The PHD, Page 22, includes Strategy (4) regarding "*open, green space*". The PRD contained a number of Actions (a) – (d) that are not contained in the PHD. This was good language – please put it back. What's currently in the PHD is good, but it needs to be buttressed with the original language from the PRD.
 - f. The PHD, Page 23, includes Strategy (5) regarding "*place-based planning*". This Strategy was in the PRD, but the Actions that were in the PRD are totally different from what is shown in the PHD. I can't tell if the PHD's Actions are intended to encompass the PRD's Actions or if the intents are different. Some terms from the PRD, such as "*broader range of housing types and compatible mixed-use developments*," "*public-private partnerships*" and "*targeted infrastructure upgrades*" do not appear in the PHD. These were good phrases. Please put them back.
 - g. The PHD, Page 24, includes Strategy (6) regarding public-private partnerships. The language about such partnerships in the PRD, page 26, Action (c), was more descriptive. Please put that language back. Also, please don't refer to Strategy 6 and 7 as "*Partner -led Strategies*". This looks like the city is taking a back-seat to these strategies. Please use language that puts the city in a more proactive position.

8. RE: Public Facilities and Services.

- a. There's a nice quote, in the red box, on Page 25 of the PRD that has been omitted from the PHD. Please put it back.
- b. The PRD, Page 27, includes Strategy (7) about developing policies for specific community areas, which is not in the PHD. Please put it back. If Strategy (7) in the PHD is supposed to take the place of (7) in the PRD, please add the additional, descriptive language that is in the PRD.

- c. The PRD's chapter on Public Facilities & Services had a paragraph, Page 33, on "*Vulnerability to Natural Hazards*", which is not in the PHD. Please put it back. This is a huge issue for Homer and should not be understated.
- d. There was a nice quote about infrastructure in the PRD, Page 34, in the box, which was omitted in the PHD. Please put it back.
- e. The PRD, Page 36, included a Strategy related to roads, which does not appear in the PHD. Please put it back.
- f. The PRD, Page 37, has a more expansive list of airport improvements, which does not appear in the PHD. Please put this list back.
- g. The PRD, Page 37, included a Strategy related to stormwater, which does not appear in the PHD. Please put it back.
- h. The PHD, Page 29, includes Strategy (3) related to Port & Harbor Infrastructure. This Strategy lists Action (a) regarding a P/H Management Plan, which I would assume would include a list of important capital projects. This Strategy also lists Action (d) regarding one specific project – the large vessel haul-out area. The P/H needs a lot of projects, so it makes no sense to single out this one particular project in the Comprehensive Plan. It makes more sense to specify, in Action (a), that the Management Plan will include a Capital Improvement Program. Then, this inappropriate call out of the large-vessel haul-out area can be omitted.
- i. The PHD, Page 29, includes Strategy (4) related to new facilities on the Homer Spit. It includes Action (a) regarding the harbor expansion.
 - i. This action should be in Strategy (3) related to Port/Harbor Infrastructure.
 - ii. I don't like the way the sentence says "[s]upport a harbor expansion..." without qualification. This sounds like the outcome is pre-supposed; that is, that the city will move forward with the harbor expansion, no matter what. It is true that the City Council is supporting the project at this time, but this is still qualified support. Feasibility and affordability must

be still be demonstrated. I recommend using language like “continue to explore the operational, financial and environmental feasibility of a harbor expansion” because that is what we are doing.

- j. The PHD, Page 30, includes three *Potential Partner-led Strategies*. This looks like the city is taking a back-seat to these strategies. Please use language that puts the city in a more proactive position.

9. RE: Housing.

- a. The PRD, Page 40, had a nice introductory paragraph about Homer’s housing situation, which is somewhat re-stated in the PHD, but not exactly, causing some ideas to be missed. Please add such language back in.
- b. The PRD, Page 42, had a paragraph about “*Tourism’s Influence on the Rise of Short-term Rentals in Homer*”, which does not appear in the PHD. This was valuable context; please put it back.
- c. The PRD, Pages 44-45, had more Strategies and Actions related to housing than what is contained within the PHD. That was some good stuff – please put it back.

10. RE: Economic Development.

- a. The PRD, page 55, has a nice graph showing community preferences for growth, which does not appear in the PHD. Please put it back.
- b. The strategies in the PHD, Page 41, for Economic Development, are completely different than the economic development strategies listed in the PRD.
 - i. Why did this happen?
 - ii. Some of the PRD’s Actions f should be put back, including:
 - 1. Action (2) about “*vocational training...year-round employment...*”
 - 2. Action (3) about “*encouraging economic growth...while preserving the natural resources...valued by residents...*”
 - 3. Action (4) about “*moderate, sustainable growth in tourism*”.

- c. The PHD has an Action (1)(a), Page 41, that says we should “*incentivize growth of the marine trades*”. This makes it sound like we’re going to do this whether it makes sense economically or environmentally. Please put some limitations around this, such as saying “support sustainable growth of the marine trades...”
 - d. The PHD, Page 42, includes nine *Potential Partner-led Strategies*. This looks like the city is taking a back-seat to these strategies. Please use language that puts the city in a more proactive position.
11. **RE: Transportation.**
- a. The PRD listed a number of Actions related to transportation that were deleted from the PHD. Please put them back.
 - b. Please identify as an Action, “Implement recommendations from the Homer Transportation Plan”
 - c. The PHD, Page 48, includes three *Potential Partner-led Strategies*. This looks like the city is taking a back-seat to these strategies. Please use language that puts the city in a more proactive position.
12. **RE: Governance.**
- a. The PHD, Pages 55 and 56, lists Strategy (1) – (4) regarding long-term fiscal planning and related Actions. Some of the Actions from the PRD’s Governance chapter are omitted and should be put back.
13. **RE: Sustainability and Resilience.**
- a. The PRD, page 29, included some nice figures related to slope stability, landslide hazard that were omitted from the PHD. Please put them back, they illustrate the point about natural and climate driven hazards.
 - b. The PHD’s Strategies and Actions related to Sustainability and Resilience are worded completely differently from those in the PRD.
 - i. Why is this?
 - ii. It’s hard to tell what exactly has changed. Are the concepts and Actions set forth in the PRD contained in the PHD, but with different wording? Or have some concepts been abandoned?

- iii. The PRD contained some helpful concepts and useful language and to the extent concepts were deleted, they should be put back.

14. **RE: Quality of Life**

- a. The PRD, Page 58, included a Quality-of-Life Chapter. I know this chapter was deleted and topics were scattered in the remaining chapters.
 - i. It's hard to tell where they went in the PHD. Do you have a road map?
 - ii. Were all the concepts adopted by other chapters or were some concepts omitted completely?

Dear Planning Commissioners,

Thank you for your service to our community, and for the opportunity to share my concerns regarding the Comprehensive Plan Update. I have previously shared these concerns with Agnew::Beck and the Planning Director, and I appreciate your consideration as well.

My primary concern is the Plan's failure to acknowledge access to potable water as a limiting factor to growth in the region. In fact, it could be a key factor in managing growth. By treating water as a controlled commodity, the City of Homer could more strategically guide development, support affordable housing, and incentivize annexation—as other communities have attempted with water policy.

Access to Homer's city water has been a driving force behind population growth outside the city limits—particularly to the east, where well-water is often non-potable. These areas rely heavily on Homer's water supply. The Plan notes (on page 12) that, since 1994, the population of surrounding communities has exceeded Homer's own population. However, the Plan fails to connect this trend to the City's role in providing water to these thirsty properties. Additionally, the City does not currently track these water deliveries, leaving a significant blind spot in understanding and managing regional development.

Because of this, Homer is missing a valuable opportunity to visualize how to manage growth strategically and sustainably.

Suggestions for Plan Revisions and Additions:

1. Acknowledge the Role of City Water in Regional Growth

Update pages 11 and 37 (and elsewhere as appropriate) to recognize the role that Homer's municipal water supply has played in supporting population growth outside city limits.

2. Begin collecting and analyzing data on current water delivery locations—both inside and outside city limits.

- Include this information on pages 11, 28, and 37.
- Identify locations where bulk water is available to the public (e.g., Safeway, Chevron, Public Works RV Dump /Potable Water Station).
- Provide a map showing where water is currently being delivered throughout the greater Homer area.

3. Explore Water Policy as a Growth Management Tool

Consider requiring each out-of-city water user to register as a Homer water customer. The City could also explore policies such as:

- **Limiting water use for short-term rentals outside city limits** to encourage long-term and affordable housing options.
- **Restricting subdivisions in areas with environmental hazards** or where development could negatively impact City services.

4. Correct Language on Page 26

Replace the word “adequate” with “insufficient” in the sentence:

“...some of the homes within the annexed areas are still not served by City services. The water and sewer services within the City are adequate...”

This better reflects the existing service gaps.

5. **Prioritize Water and Sewer Extensions within City Limits**

Page 28 should emphasize the importance of extending water and sewer services to all existing City residences. Our infrastructure makes such extensions feasible and cost-effective, as the water system lies uphill and the sewage system downhill from these neighborhoods.

6. **Clarify Status of Kachemak City and Existing Agreements**

On pages 10 and 37, explicitly acknowledge that Kachemak City is the only incorporated second-class city in the region, and reference the existing water and sewer service agreements between Homer and Kachemak City. The Plan currently groups Kachemak City with unincorporated areas like Diamond Ridge and Fritz Creek, which may be misleading.

Finally, on another note:

7. **Maintain the Gateway Business District Identity**

On page 17, the proposed change from “Gateway Business” to “Commercial Mixed-Use” appears to contradict the stated goals of the Gateway District—specifically, preserving scenic views and ensuring a welcoming entrance to Homer. I recommend retaining both the name and the intent of the **Gateway Business District**, as originally envisioned.

The Comprehensive Plan is a thoughtful, forward-looking document, and I commend the effort that has gone into its development. As an ecologist who moved to Homer 35 years ago from drought-afflicted California, I understand firsthand that water availability, as a limiting factor, can shape a communities growth. I hope the final Plan will address this reality more directly and comprehensively.

Summary of Requested Modifications:

1. Acknowledge the role of Homer city water in population growth outside city limits.
2. Collect and analyze data on City and non-resident water delivery use.
3. Research and consider how other communities (e.g., Santa Barbara, Walla Walla, Lake Tahoe) use water policy to manage growth.
4. Correct language inconsistency on page 26.
5. Prioritize extension of water and sewer services to existing City residents.
6. Acknowledge Kachemak City’s status and agreements with Homer.
7. Retain the Gateway Business District name and original goals.

Thank you again for your time and your dedication to shaping Homer’s future.

Sincerely,

Rick Foster

Former HAPC and KPB PC

Homer city resident

William Anderson

From: Mike Illg
Sent: Monday, July 28, 2025 10:20 AM
To: Shelly Wade
Cc: Ryan Foster; Department Planning; Dave And Lyn
Subject: Comp Plan information/Comment
Attachments: Page 4- Top priorities07-23-25
_homercompplanupdate_publichearingdraft_reduced.pdf; Detailed Project Timeline – April 20Page 26- 24_ _shared with Steering Committee as component of the project
Public Participation Plan – broader schedule also shared at subsequent meetings.pdf

Hi Shelly, et al,

In looking at the latest public comp plan document I must commend you all as this certainly covers many aspects of our Homer community especially with such a wide range of topics, issues, needs, etc. to help us plan for the future. I am also pleased to see municipal parks and recreation identified as a core service.

More importantly, I also want to point out **again** that while the of process of soliciting community input, you all have received data/feedback that *"Increase access to recreational opportunities for visitors and residents"* is a top priority and is still not listed as such despite meeting the **74% threshold**. This question/topic has been pointed out previously and the email below makes reference where the data is located.

On page 4, yellow box lower left. See attachment.

https://www.cityofhomer-ak.gov/sites/default/files/fileattachments/planning/page/78660/07-23-25_homercompplanupdate_publichearingdraft_fullplan-append.pdf

There is a lot of support and interest for recreation (indoors and outdoors) and the City is making significant strides in supporting these opportunities as it is clearly important to residents. As you all know being able to refer to the comp plan not only shows an solid reflection what are the community needs but also helps with planning for future legislation, funding, opportunities, partnerships, grants, etc. Not listing *"Increase access to recreational opportunities for visitors and residents"* as a top priority is inaccurate and could hinder future opportunities for this field and service. See attachment.

With all due respect to the hard work and professionalism with this process so far, I would suggest the document be corrected/amended and list this topic as one of the identified **top priority** list based on the data that was received. Or at least a formal response why this is not included on the priority list.

Thanks,

Mike Illg

From: Mike Illg
Sent: Monday, February 10, 2025 6:48 PM
To: 'Shelly Wade' <shelly@agnewbeck.com>
Cc: Ryan Foster <rfoster@ci.homer.ak.us>
Subject: Comp Plan information

Hi Shelly,

Thanks for the work on the Comp Plan! As a follow up to my questions earlier today, I am sending this follow up email at your request.

I am asking about out the topic *"Increase access to recreational opportunities for visitors and residents"* is not listed as an identified under:

Top Priorities and Projects for Homer to Focus on for the Next 10-20 Years (page 4) in your executive summary.

https://homercompplanupdate.com/wp-content/uploads/2025/02/Feb2025_2035HomerCompPlanUpdatePRD_ExecSumm.pdf

Whereas *"Increase access to recreational opportunities for visitors and residents"* issue has received public feedback from your October survey at **74%** for respondents within city limits and **76%** for respondents outside of the city.

As listed as Top Priorities by Location (Page 26)

https://homercompplanupdate.com/wp-content/uploads/2024/10/10-02-24_HomerCompPlanCommSurvey_ComparisonsSummary_Final.pdf

I would suggest the *"Increase access to recreational opportunities for visitors and residents"* topic be included as a priority be included in the "Top Priorities and Projects for Homer to Focus on for the Next 10-20 Years" based upon the statistically valid data information that was collected by Agnew::Beck that actually shows it has a response at 74% which is the threshold you have identified that qualifies as a top priority for the current comp plan document.

Thanks,

Mike Illg

Top Priorities by Location

N = 497

Responses included where more than 50% of respondents agreed

Top Priorities ("Very Important" or "Important")	% of Responses
Increase supply and accessibility of affordable housing	87%
Create a livable, walkable, vibrant downtown	83%
Encourage the retention and creation of more year-round and higher wage employment	82%
Encourage renewable energy projects	77%
Preserve open public spaces within the city from development	77%
Increase access to recreational opportunities for visitors and residents	74%
Increase the diversity of Homer's economy and economic foundations	73%
Prepare for and address the effects of climate change on Homer	69%
Support the commercial and sport fishing industries	62%
Attract more year-round residents of all ages	54%

Top Priorities ("Very Important" or "Important")	% of Responses
Increase supply and accessibility of affordable housing	87%
Encourage the retention and creation of more year-round and higher wage employment	84%
Preserve open public spaces within the city from development	76%
Increase access to recreational opportunities for visitors and residents	76%
Encourage renewable energy projects	73%
Create a livable, walkable, vibrant downtown	72%
Increase the diversity of Homer's economy and economic foundations	69%
Support the commercial and sport fishing industries	66%
Prepare for and address the effects of climate change on Homer	60%
Attract more year-round residents of all ages	52%

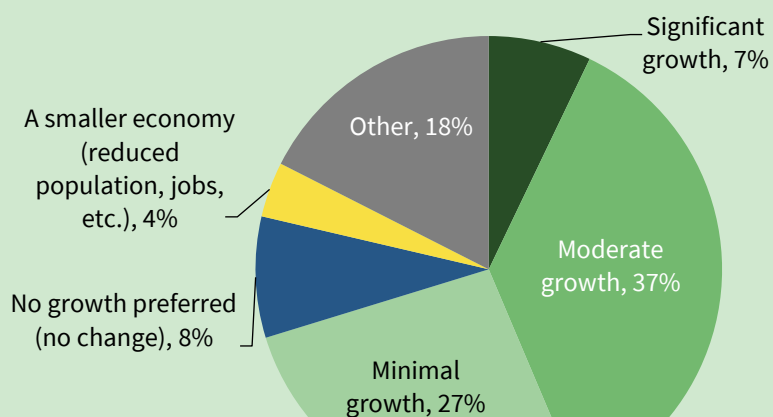
Only three priority areas showed a **greater than 5% difference** by location (see callouts on next slide)

Who responded to the 2024 Community Survey?

556 people participated in the survey, exceeding our goal of 500 participants. 224 comments were received on the interactive map. Of the 556 survey participants:

- 70% have lived in Homer more than a decade.
- 91% live in Homer year-round.
- 39% reside within the City of Homer limits.¹

Desired Growth



Most comments about growth discuss “sustainable and controlled growth” with a focus on planning that considers environmental impact, infrastructure capacity, and preservation of Homer’s character.

Housing Highlights

- 76% of survey participants are satisfied/very satisfied with their current housing situation.
- 68% say housing is too expensive in Homer.
- 66% say more attainable starter homes are needed for younger residents, families, or residents that wish to downsize.

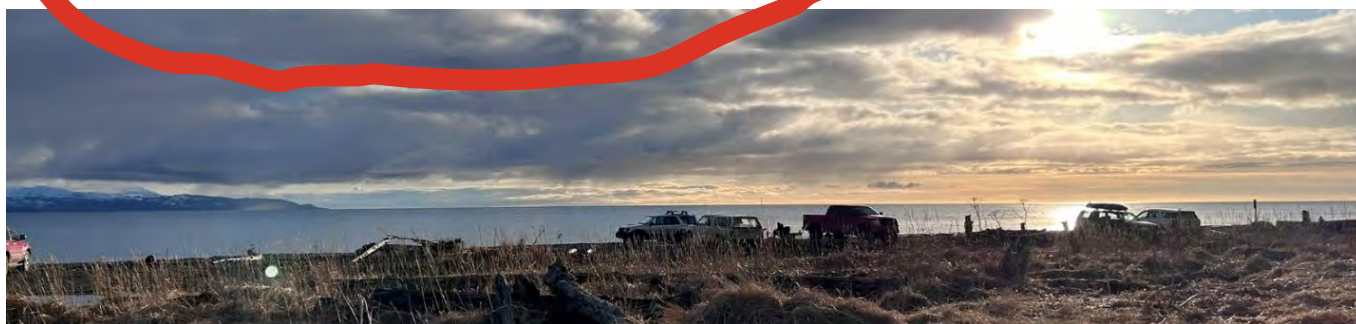
Quality of Life

- A combined 82% rate the quality of life in Homer as good/excellent.
- A combined 88% rate Homer as a good/excellent place to raise a family.

Top Priorities and Projects for Homer to Focus on for the Next 10-20 Years

- Increase supply and accessibility of affordable housing
- Encourage the retention and creation of more year-round, higher wage jobs
- Preserve open public spaces within the city from development
- Create a livable, walkable, vibrant downtown
- Encourage renewable energy projects

Identified as “important/very important” by 74% or more of survey participants.



¹ The project team conducted a deeper review of many of the community survey results to check for variations by age, income, and location. There was minimal variance across these categories. [Click here](#) to view the comparison results.

The plan has made great progress from the original drafts...more readable and actionable...well done.

The following is a list of action items for the Planning Department generated from the following Google Gemini AI query:

For the three attached documents, (The Executive Summary, Core Plan and Appendices) please identify the action items directed to the Planning department.

The Google Gemini analysis results are as follows:

Based on the three provided documents, the following action items are directed to the City of Homer's Planning Department and/or Planning Commission:

Governance

- Collaborate with City staff, boards, and commissions to prepare annual work plans based on the comprehensive plan's action plans.
- Present accomplishments and proposed priorities from the Comprehensive Plan to the City Council each year as part of the annual work planning process.
- Develop a website with tracking information for annual reporting of implementation progress.

Housing

- Explore new tools and regulations to increase the housing inventory, such as implementing a program to track Accessory Dwelling Unit (ADU) permits and streamlining the permitting process.
- Review existing zoning codes and modify them to support a greater diversity of housing options, including mixed-use development and infill.
- Gauge community support for zoning and policy tools that expand housing options.
- Address the cost and complexity of construction on vacant or underused properties through targeted infrastructure investment and infill-oriented zoning strategies.

Land Use and Environment

- Develop technical mapping tools, including stormwater drainage basins and flow paths, to guide City-led infrastructure decisions and support watershed-based planning.
- Inventory land with geographic information systems (GIS) to identify priority sites for open space acquisition and hazard mitigation.
- Develop a wetlands inventory and management plan to guide long-term land use decisions based on the function and value of wetland areas.
- Consider and potentially adopt an updated, science-based wildlife corridor map that integrates habitat data, climate resilience, and land use patterns to protect critical habitats.

- Explore incentives and voluntary guidelines that encourage sustainable development practices on private land.

Question for the Planning Commission:

Do you feel comfortable with all that is being asked of the Commission and Department?

2045 Plan

Somewhere along the way we transitioned from a 2035 plan to a 2045 plan. That's ok, as it may have cost savings by not having to repeat this process ten years from now.

A 2045 plan, a seemingly simple change, highlights greater uncertainty in those outlying years. Financially speaking, our ability to forecast financial needs in a two-year budget cycle is challenging enough. Trying to understand the financial impact 20 years from now resulting from planning decisions set in motion today, is even more challenging.

RECOMMENDATION:

Make note of that transition somewhere in the beginning of the document. In addition to that note, the document should say that the plan, being a 20-year plan, is designed to be flexible in its implementation. At no time should the City of Homer be held to take a particular action by a particular time, irrespective of cost and benefits received. This plan should be recognized as an **aspirational** guide for the future. As noted on page 14 of the core plan:

Goals

*Themes are followed by a broad set of goals. The goals identify long term, **aspirational** improvements.*

This is the only location in all the documents where the term "aspirational" is used.

RECOMMENDATION:

At a minimum, each document should reinforce that the actions herein are aspirational in nature and not an obligation. They are descriptive, not prescriptive.

Additionally, on page 14 of the core plan it says the following:

Plan Amendments and Updates *The Kenai Peninsula Borough holds planning and platting authority; therefore, all plan amendments and updates require approval by the Borough. This is intended to be a 20-year plan, although if conditions change significantly in the community within the 20-year period (such as major population growth or population loss), it may be necessary to update sooner.*

RECOMMENDATION:

Given the high hurdle of borough approval for changes and amendments, I encourage the planning commission to look closely at the obligations noted above and consider if it would be wise to “soften” some of those action items to make them more aspirational.

That said, there are still some cleanup items that I recommend you consider as it passes on its final route for approval.

- 1) The Coast Guard 110 ft small cutter is no longer stationed in Homer. In the future, the Buoy Tender (Aspen) is unlikely to be stationed in Homer as the Coast Guard focuses on its fast response vessel design based in Kodiak. Has the plan sought to understand the impact of the Coast Guard leaving, both financially and housing?
- 2) The term “climate change” appears four times in the executive summary, six times in the core plan and eight times in the appendices and yet lacks a definition. Failing to define “climate change” in the appendix muddies the waters when it comes to action planning. Some people think that addressing climate change is preparing for weather conditions that could come about from long term trends. Others believe climate change requires taking action to reduce Greenhouse Gases (GHG) associated with energy production (community survey result quote near the bottom of page 60 in the core plan).

Failing to define the term “climate change” results in a reduced focus on what we are trying to achieve. Throughout much of the plan, there is discussion of protecting infrastructure from, or mitigating risks to infrastructure from the “impacts of climate change”. Yet, there is another term, already used many times in the documents, that effectively renders the term, climate change, as unnecessary—and that is resilience. The definition of resilience as stated in the Appendix B Glossary (and hasn’t changed from the last draft) is:

Resilience: The ability of a community to anticipate, plan, and prepare for **threats**, persevere through stressful or disruptive events, and recover and adapt to new conditions.

If the impacts of climate change exhibit themselves as **weather related threats**, then building resilience into our designs and decision-making processes addresses this threat. I recommend we eliminate the phrase “climate change” or “impacts of climate change” and replace it with “weather related threats”.

As noted in the core plan on page 59, In the 2023 community survey, 74 percent of respondents said it was “very important” to encourage renewable energy projects over the next 20 years.

That's admirable, however, the community was only presented with part of the information when asked about renewable energy. The question failed to ask "at what cost?" and "who pays?". Who wouldn't want renewable energy if it's free?

The current tax levy on each dollar assessed valuation of taxable property within the city is 4.5 mills, and the rate of sales tax is 4.85 percent. What if the question asked was "would you support the city of Homer investing in renewable energy projects that reduce global greenhouse gas emissions by 0.000001% and will result in a property tax increase of \$500 per year?" Or "would you support the City of Homer investing in renewable energy projects that reduce global greenhouse gas emissions by 0.000001% and will result in a sales tax increase that translates to \$200 per year for each resident of Homer?"

RECOMMENDATION:

Please reconsider Page 8 of Appendix I where it says:

Sustainability and Resilience Potential Partner-led Strategies

4. Leverage Partnerships to Advance Community-Wide Sustainability and Resilience. Advance Renewable Energy and Infrastructure Innovation

- a. Support the expansion of electric vehicle charging infrastructure across the community to reduce transportation-related emissions and improve access for residents and visitors.
- b. Collaborate with partners to advocate for and invest in renewable energy sources, including hydroelectric, solar, wind, and tidal.
- c. Coordinate with utilities to pilot and plan for future microgrid networks that improve local energy resilience and distribution.

The language of these three activities obligates the city to provide funding for resources that doesn't make economic sense. These kinds of activities are not cost effective and are inconsequential regarding green house gas reductions.

I propose the following **highlighted** modified language to be used:

Sustainability and Resilience Potential Partner-led Strategies

4. Leverage Partnerships to Advance Community-Wide Sustainability and Resilience. Advance Cost-Effective Renewable Energy and Infrastructure Innovation

- a. Support the expansion of electric vehicle charging infrastructure across the community to reduce transportation-related emissions and improve access for residents and visitors.
- b. Collaborate with partners to advocate for and invest in renewable energy sources, including hydroelectric, solar, wind, and tidal.
- c. Coordinate with utilities to pilot and plan for future microgrid networks that improve local energy resilience and distribution.

These three actions are DESCRIPTIVE of the types of actions the city may take. They are not PRESCRIPTIVE. The comprehensive plan does not obligate the city to fund these activities if it becomes clear there is not a cost-effective way to implement them.

Do the math

For reference: On March 5, 2024, I performed a presentation at the Port and Harbor Advisory Commission Work Session that included deploying tidal energy generation as part of the Homer Harbor expansion.

Here is a link to the meeting materials: <https://www.cityofhomer-ak.gov/phac/port-harbor-advisory-commission-worksession-18>

The GHG reduction calculations in that presentation demonstrate the inconsequential impact these actions would have to reduce global GHG, yet there was/is desire to continue to investigate and perhaps even deploy tidal energy generation as part of the project. The bottom line is, diversifying the energy portfolio (at an enormous cost) should not drive scoping discussions for the Port and Harbor expansion effort and it likewise shouldn't drive activity from city staff (or consultants) as part of this comprehensive plan.

Final word on climate change

If we feel the need to continue to use the phrase "climate change" we should define it.

RECOMMENDATION:

I recommend the following definition provided by Google Gemini AI:

Climate Change: A long-term shift in the average temperature and weather patterns of a region or the Earth as a whole.

How this plan will address climate change

This comprehensive plan seeks to mitigate the effects of these weather patterns through resilience planning. This comprehensive plan does not seek to obligate the City of Homer to deploy greenhouse gas reducing activities that do not result in direct cost reductions in the conduct of city business.

Sustainability

On page 2 of appendix B, the term Growth, Sustainable is defined as:

Growth, Sustainable: *Creating long-term value without depleting natural or social resources, characterized by practices that are environmentally friendly, socially responsible, and economically viable.*

This definition identifies a link to RVKS and Associates which has used the following language in their definition of sustainable growth:

Rather than just focus on quantity of growth, “quality” of growth is also relevant. The need for “sustainable” growth in organizations for instance, is not just about increasing financial metrics; it integrates a broader perspective that encompasses environmental, social, and governance (ESG) factors.

The comprehensive plan should not be attached to philosophies like ESG factors which has been demonstrated to be inferior when managing a business. For several years, financial advisor Ric Edelman cautioned against jumping on the ESG bandwagon as he expected the financial performance of companies that emphasized these factors would fall short of other companies—for a variety of reasons. In his December 21, 2023 podcast, titled "The False Narrative of ESG Investing", he discusses why ESG investing is misleading and demonstrates that ESG funds have underperformed the overall market, as measured by the S&P 500.

Here is a link to the episode on Apple Podcasts: <https://podcasts.apple.com/us/podcast/12-21-23-the-false-narrative-of-esg-investing/id1603081576?i=1000639343039>

Additionally, on page 3 of Appendix B, Sustainability is defined as:

Sustainability: *The process of using our finite resources as a community to balance the goals of economic vitality, environmental stewardship, and social equity to ensure that we can meet the needs of present generations without compromising the ability of future generations to meet their own needs.*

Perhaps it is just an oversight, but using a definition of sustainability that includes social equity is just not proper.

As noted in my comments from March 2025, “the City Government is here to provide core services, not to be a social equity and climate leader. City Government should focus on the blocking and tackling of providing core services in a safe, responsive, excellent, and economic fashion.”

Perhaps a simple solution would be to use the definition of sustainability that has already been published in the City of Homer document intitled “Money, Energy and Sustainability A policy guide for City of Homer employees on reducing energy use and waste in local government operations”:

What is “sustainability”? One of the simplest and most often cited definitions of sustainability refers to practices that “meet the needs of the present without compromising the ability of future generations to meet their own needs.”

Source: World Commission on Environment and Development—Our Common Future (1987)

RECOMMENDATION:

Change the definition of Sustainability to the version that is already used in the City of Homer Policy guide.

Closing:

This comprehensive plan is nicely improved over the previous version. My review and commentary are not exhaustive. However, the few additional improvements I have noted above should substantially improve the document to assist us as we plan for 2045. Thank you for the opportunity to participate.



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 stakeholders 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-into-climate-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; hal shepherdwpc@gmail.com if you have any questions regarding these comments. Thank you.

Sincerely,

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