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.
<u>underline</u> - recommend adding language.Key to suggested changes:
* - Code Needed

p. 15-16 Modernized Zoning is Essential for Attainable Housing, **<u>Quality of Life</u>**, 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.

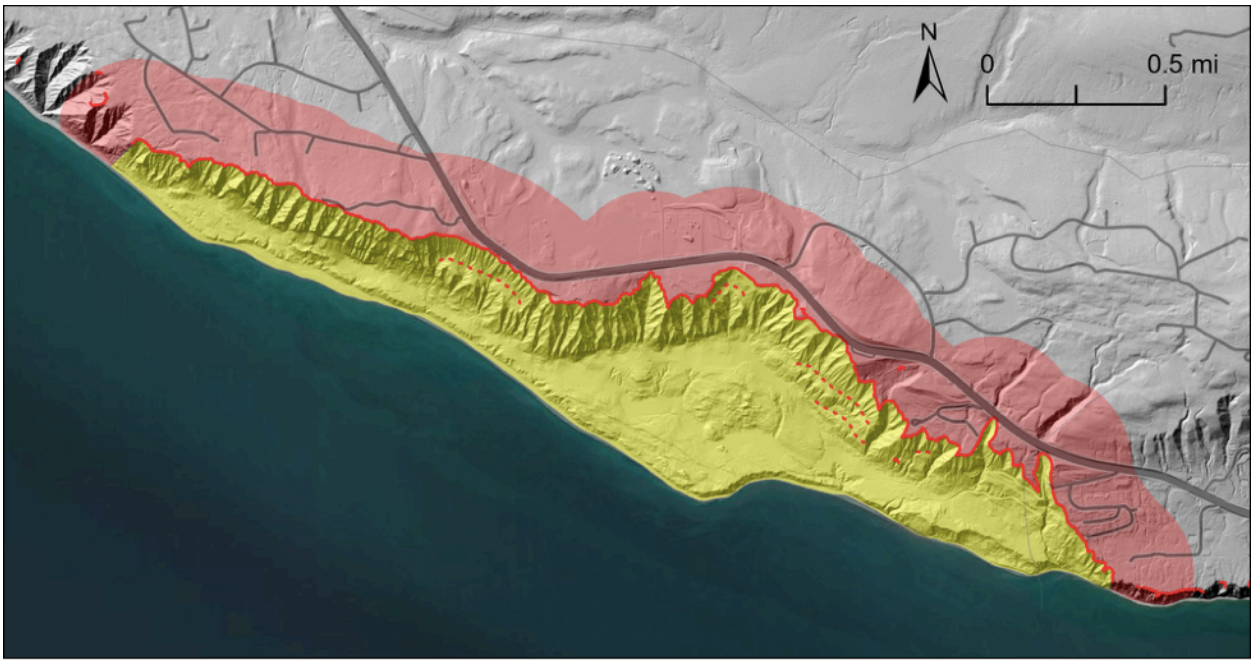

Figure 8. Deep-seated landslide susceptibility near the Bluff Point landslide (red polygon). The landslide body (yellow area, south of the red headscarp line) is the landslide deposit and is also susceptible to repeated failure.

P.21 ~~**Gauge community and stakeholder support for**~~ **Implement** zoning and policy tools that expand housing options, such as density bonuses, **long-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**
Estimated Cost: Undetermined
Target Timeframe: Short (1-2 years)

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
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