

League of Women Voters of Lawrence-Douglas County

P.O. Box 1072, Lawrence, Kansas 66044

April 29, 2007

Sue Hack, Mayor
City Commission
City Hall
Lawrence, KS 66044

Dear Mayor Hack and City Commissioners:

RE: ECO² PLAN

We appreciate the amount of effort and study that this ECO² Plan represents, and it is important to us for any such plan to be able to achieve its goals.

An important principle in the position on Environmental Quality, Land Use, of the Lawrence-Douglas County League of Women Voters regards county development. Our position on Conservation of Agricultural Land and Open Space states, "New non-farm development in the unincorporated areas of the county should be limited to the urban growth areas of towns and cities in anticipation of annexation," and we have steadfastly supported the preservation of open space and farmland and in the rural area. We also recognize that there are very special lands that must be preserved by means beyond regulation, and this is why we support special programs for their acquisition and permanent preservation, such as embodied in the ECO² Plan.

After reviewing the ECO² Plan, we noted some aspects that could create confusion or cause problems in its implementation and are therefore offering this letter with what we hope are useful suggestions.

1. Paragraph two on page 10 of the Plan, ECO² Open Space Preservation Program recognizes that "outside the incorporated communities Douglas County is primarily a rural and agricultural county [and]...most of Douglas County is "open space" in the form of farmland and undeveloped land." We appreciate that the Plan recognizes this, and ask that you include a statement that this undeveloped open space beyond the "open lands" slated for active preservation should be recognized as worthy of continuing as open space and farmland.

On page one of the Plan, the sentence in paragraph three states, "Both open space and industrial/business park development should be pursued..." We think this is a typographical error and would appreciate your adding "preservation" after "open space."

2. The second area of concern to us is the "concept of net equity in funding" to equate the public investment in open land with that of industrial park public investment. We suggest that the calculation of net equity is more complicated than indicated in the Plan and is difficult to compute fairly.

For example, public costs in services v. s. tax returns should be considered in the computation. When open lands are held as conservation easements by public entities and not in fee simple, these lands still return taxes and require almost no public expense in terms of services. Also, the manner in which industrial investment is publicly funded determines how much of the initial investment will be returned proportionate to similar land uses not publicly funded. Tax increment financing provides repayment of the public investment. However, when the taxes from the industrial development so financed are targeted for repayment of public debt, those taxes cannot be considered as adding to the city or county general revenues, and these uses still require services. We suggest that you examine this concept in more detail.

Industrial/Business Park development may create other side effects that incur public costs. An important consideration is that industrial development encourages growth, and the secondary and tertiary community costs, *unless the growth pays for itself*, may also contribute to a net loss in public tax revenues.

3. The Industrial/Business Park Program, in its testing of the model for “Selection Criteria and Ranking Process” on page 6, has included a system of ranking sites that we assume the ECO2 Commission hopes will provide an unbiased system for assessment of sites. Included in these criteria are “Required selection factors” and “Preferred selection factors.” We are very concerned that the two most important selection factors, ones that should be *absolute* requirements have been incorporated in the grouping of “extraordinary costs” and can therefore be overlooked or ignored.

Incorporation into one of the existing cities in Douglas County should be the first “criterion” and an absolute requirement. Industrial/business parks and/or uses should never be approved for unincorporated status. In conjunction with this should be locations that are in convenient proximity to urban boundaries so as to facilitate their annexation. The purpose of the industrial/business parks is to be beneficial to its hosts. Many studies have shown how devastating is the situation to both the counties and cities where industrial/business parks have existed outside of corporate limits.

Provision of urban infrastructure should be the second absolute requirement separate from the other selection factors. We believe that both of these criteria should be attainable before any of the other criteria would apply.

4. We believe the ranking system for the Industrial/Business Park beyond the two most important absolute requirements listed above, needs reexamining. It is presented as a model for the unbiased future selection process.

The industrial/business park sites are ranked based on the highest scores being ranked first, with the ranking numbers presented inversely to the scores; i.e., the highest scores receive the lowest numbers, meaning they are first in priority, and on up the scale. In the table ranking the proposed sites for industrial/business parks, we found that there was not an equivalent relationship between the scoring and the ranking of these sites. (Please see Attachment A).

In the table ranking the proposed sites for open lands preservation, we found that a different system of ranking had been used, giving the lands with the highest scores, the highest ranking numbers, also meaning the highest priorities—just the opposite of the system for choosing the industrial sites.

We suggest that you describe in more detail your final ranking systems. It is also very important that the actual resulting ranks for each site reflect its score, if this is the system to be used.

Again, we hope that you will find our comments useful. We appreciate your efforts and commitment to this project.

Sincerely yours,

Paula Schumacher, President

Attachment

ATTACHMENT A

DISCREPANCIES IN THE ECO ² PROPOSED INDUSTRIAL SITING SYSTEM BETWEEN SCORES AND RANKS				
Scores of Industrial Sites in Numerical Order, Highest Scores First	Proposed Industrial Site Label	Site Rankings Based on Numerical Order, Highest Scores First	Site Rankings Based on Table in Actual Text, Appendix C, p. 28	DISCREPANCIES (Asterisk indicates text ranking does not reflect actual site score)
4.32	C	1	3	*
4.32	D	1	3	*
4.18	I	2	2	
4.02	K	3	1	*
3.87	H	4	6	*
3.74	G	5	8	*
3.32	A	6	7	*
3.27	E	7	5	*
3.22	J	8	10	*
3.06	B	9	9	
1.84	F	10	11	*