

## Thriving Communities Program, Networked Communities

Comments from the RAIB (The Ray, Arcadis, InfraStrategies, and Beverly Scott) team. RAIB was selected as one of the Capacity Builders for the U.S Department of Transportation (U.S. DOT) Thriving Communities Program. As part of this program, RAIB was paired with 15 communities to provide technical assistance and capacity building. The City of Saint Paul, Alaska, is one of the communities we are working with, and as part of our technical assistance, the city requested we review the CEDS and provide feedback by the public comment deadline.

### Overarching comments:

1. The document needs to be formatted to match the revised CEDS directive:  
<https://www.eda.gov/resources/comprehensive-economic-development-strategy>
  - a. Guidelines:  
<https://www.eda.gov/sites/default/files/2023-03/2023-CEDS-Content-Guidelines-Full-Report.pdf>
  - b. Recommend following standard order:
    - i. Summary Background
    - ii. SWOT
    - iii. Strategic Direction / Action Plan
    - iv. Evaluation Framework
    - v. Economic Resilience
    - vi. Climate Resilience
    - vii. Workforce Development
    - viii. Equity
    - ix. \*Broadband
  - c. The first 5 are the main areas. As of April 2023 - the next four are new. Some of these are covered partly under the other sections, however, there appears to be a lack of coverage in other areas.
  - d. Regulations governing CEDS: 13 C.F.R. § 303.7
  - e. Can help for future when applying for Grants such as:  
<https://www.eda.gov/funding/funding-opportunities>
2. All appendices need to be attached to the main document.
3. Eight priority areas might be too many to start with. Maybe start with overarching gaps and then pair down into focus areas.
4. It appears that the owner of the document is the Tribal government with input from others. What is the City of St. Paul's role in the process? Who contracted the consultant?
5. This plan might benefit from a specific Small Business section, with specific goals and strategies related to small business development and retention, rather than a mismatch of strategies spread across the various sections
  - a. Another consideration for the small business section, what are activities that the tribal organization is doing that could be facilitated by a small business?

- b. The City Council passed an ordinance allowing marijuana growing, are there small business opportunities there?
6. There could be more of a focus on how the proposed economic development strategies tie in with workforce development in the community. It is a small enough community that individualized retooling/upskilling programs could be created for those interested, based on the needs of the economic development plan that is determined.
  - a. A good action item for workforce development is to create a plan that will design a workforce program focused on existing circumstances in the community, designed to retain existing population and grow the community based on new opportunities.
7. Having infrastructure goals outlined that would benefit economic development would be helpful. This could be divided into maintenance of existing infrastructure (including impact of climate change) and new infrastructure needs.
8. We are concerned that some of the priority strategies (like mariculture) may not be best use of limited resources and/or may stem from a desire to reuse existing infrastructure rather than a longer-term strategic approach for the island's economy
9. The consultant and sponsoring entity need to verify proposed strategies are tailored specific to the needs of the local community
10. The CEDS should be a vehicle for promoting integration between economic development and other regional plans (including other federally-funded plans), which could include, but not be limited to, sustainability, transportation (e.g., Metropolitan Transportation Plan, Transportation Improvement Program), land use, housing, environmental protection, natural resource management and development, workforce development, disaster resilience, or others.
11. The CEDS should also identify opportunities for the integrated use of other local, state, private, and federal funds. The nature and extent of the integration between regional plans and funding streams will vary based on the unique circumstances of each CEDS region, but every effort should be made to leverage scarce resources to avoid duplication and increase impact. Some funding is mentioned but recommend more strategic alignment that is future focused and not just state funding in place.
12. Understanding that the evaluation framework is pending public comment, this section needs more detail on the approach and performance measures.
13. The plan needs a stronger resilience component – challenges, how to identify early warning signs, adaptability, pre-disaster recovery planning, climate adaptation, promote a positive vision.
14. This CEDS is for 2024-2028. Therefore, it needs to outline an achievable set of goals for this timeframe and set up a framework for long term goals.
15. The plan needs a stronger workforce development strategy, as noted above.
16. As the framework for evaluation is finalized, there needs to be consideration of ROI when picking priority actions.
17. We recommend outlining a procedure for CEDS plan adaptation as well as policy recommendations as appropriate for successful implementation of the strategic plan.

### **Content specific comments:**

1. Should the Arctic Opportunities be combined with the Research section?
2. Should Community Foundation not be strategy no.1 as it underpins so much of the success of the other 5 strategies?
3. Wouldn't it be better to have a separate section explaining how economic resilience is taken into consideration, maybe a chapter 5? The standard CEDS doc mentions that it's a must to incorporate the concept of economic resilience. (See note above about the updated CEDS framework).
4. Chapter 2 – Summary Background, it would make sense to include what has been done so far to alleviate the economic conditions, and what were the challenges they might have faced on the previous 2017 CEDS
5. The St. Paul Economic Vision and Goals diagram on page 32 is repeated in the executive summary, there is an opportunity to show a different graphic/information.
6. In the Mariculture section, a good goal/strategy would be conducting a feasibility study, perhaps funded by the Build Back Better Regional Challenge funds that were secured.
7. What portion of the Mariculture funds are dedicated to the City of St. Paul?
8. On page 37, one of the fisheries weaknesses is "Boatyard is dangerous and unsightly". There could be a grant opportunity here for infrastructure improvements/safety.
9. On page 47, one of the research weaknesses is "Internet limitations". This is another potential opportunity for grant funding, which could be added as a strategy to support all economic development activities. This could be further elaborated on as part of the new Broadband section.
10. The research section could be expanded to include new technologies, instead of just focusing on wildlife.
11. Increasing tourism would require substantial rebranding and investment, need to consider if it is the best use of limited resources.