

**Public Comment  
Forest County Potawatomi Community  
Class I Redesignation**

**by  
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There are numerous issues facing citizens and businesses in evaluating the possible costs of the proposed Forest County Potawatomi Community PSD Class I Area Redesignation. My comments will review some of the major issues or concerns that I have after attending the public hearing held by the Forest county Potawatomi Community

**Process**

The redesignation of Native American lands to PSD Class I follows a process that has not allowed adequate time for public comment. The complexity of this issue requires local governments have more time to review and study the potential impacts to the local environment, social and health services. Each community that will be effected by this redesignation have economic and energy strategies that must also be considered.

Communication with governments in the effected region has been limited. For this reason, I request that additional time for public comment be provided so that each community can address issues that will effect local residents in northern Wisconsin and the upper peninsula of Michigan.

I request that an additional 60 days be made available for written comments to be recorded as part of the public record for this Class I Air Redesignation Project.

**Technical Report**

The redesignation process requires that the Forest County Potawatomi Community prepare reasons for the proposed redesignation. The report is to provide a satisfactory description and analysis of the health, environmental, economic, social, and energy effects of the redesignation.

In Section 7.1 Current Regional Economic Structure, the area that was described in the report as potentially effected was Forest County and the counties that border Forest County. However, the redesignation of the Forest County Potawatomi lands to Class I would effect properties within 100 kilometers radius of their lands. This area could be extended if a major source was located beyond the proposed area. This redesignation would also impact Marathon and Lincoln counties that are to the south and east of Oneida County. The impact to these counties as well as impacts to the State of Michigan are not considered, described, or analyzed in this technical report.

Also, the review of each county's economic structure is limited to the number of people employed in factories, largest county manufacturer, the largest non-manufacturing entity and the sector that generates the largest segment of total personal income. This review doesn't provide a description of each county's economic condition. The report should describe at a minimum the following:

- Analysis of employment growth by sector should be conducted for each county using the past ten years to develop an employment trend for each county. For example, Oneida County has been steadily increasing the number of jobs available in manufacturing. In July of 1994, manufacturing employment increased by 82 jobs. The current report uses 1990 census information, which is actually 1989 information.
- The economic impact to local industries must be considered, several companies in the county are starting or completing expansions. An analysis of the cumulative impact to existing industry should be conducted. This is not done and is impossible without baseline data and Air Quality Related value being established.
- The accuracy of this report is also called into question, when the brief economic description doesn't provide correct information on largest non-manufacturing employers in a county. For example, Howard Young Health Care is the largest non-manufacturing employer in Oneida County.
- A description of personal income growth needs to be described in detail. Oneida County was one of the leading counties in personal income growth in 1991. A description of the potential effects on personal incomes to residents of Oneida County must consider the exact personal income by employment sectors. The growth of personal income in each sector should be developed, so that a trend analysis can be conducted from a general description.
- Also, the employment census information contained on page 57 of the Forest County Potawatomi Report is dated and doesn't provide an accurate assessment of employment by sectors. In Oneida County, the number of new jobs in the manufacturing and health care has increased considerably due to expansions of existing facilities. These existing industries expansions are not considered in this report's review of employment.

Conducting an economic review of the effect region is an important part of the redesignation procedure. Local governments must be able to analyze the various impacts that the Class I Air Redesignation Project would have on current and future services.

Also, the report provides Table 7-2 "Tourism Sensitive Sales of Oneida County, Wisconsin" as documentation that up to 11% of the employment in the region is related to tourism or recreation. The sales numbers on Table 7-2 are correct, but numbers from 1988 and 1989 are outdated for

analysis purposes Valid conclusions can not be made without current information. Sales tax information is currently available through 1992 Why were the years 1988 and 1989 chosen? What formula was used in the development of this assumption? How would this assumption change if Forest County was used for base numbers

Oneida County, which the report uses as its base county, is the major shopping destination of parts of Forest, Lincoln and Vilas counties. An analysis of each county's economic activity is required to satisfactorily describe and analyze the economic condition of the region effected by the proposed Class I Air Redesignation Project

### Oneida County Economic Climate

As the executive director of the OCEDC, I have been impressed by the tenacity and the competitiveness of Oneida County businesses. In 1993, the average unemployment rate of Oneida County was 5.0% compared to 4.6% for the state. The workforce has grown steadily since the early 1980's Recent expansions in health care, retail sales, and manufacturing will allow Oneida County to successfully weather economic downturns in operating conditions.

Now, the existing economic base of Oneida County is stable and continues to grow This was not the case ten years ago Now, many local companies are investing in new or improved technologies to remain competitive in the world market place. An industry that reinvests in new or improved technologies in the production process provides job security to employees Curtailed operations or the inability to expand a plant due to higher air quality controls may force a reduction in a companies production and revenues. The higher cost of operating a facility in this region would cause companies reinvestment into local plants to be reduced Thus, the competitiveness of local facilities in the world market place would be reduced

The report should analyze the number of expansions that existing industries have completed in each county during the past ten years This will provide baseline data for the potential growth of existing industries Local governments will then be able to address economic development planning issues that may arise due to the higher air quality standard being approved.

### Other Concerns

The economic condition and lifestyle of each citizen in this region will be effected by the proposed redesignation of the Forest County Potawatomi Community I request that the necessary economic studies be conducted to allow local communities address impacts to tax base, services, revenues, and residents.

Without conducting an analysis of personal income by industry sectors, the governments of the northwoods have no method of forecasting future industry income growth, by sectors Therefore, average income levels of local residents will remain well below state and national averages Also, pressure for tourism related industries to increase wages will decrease due to less growth in high paying manufacturing facilities

The Class I Air Redesignation Project will also impact the ability for local residents to afford property in Oneida County. Oneida County is experiencing a 14% increase in assessed valuation. If the Class I redesignation hampers business development and the creation of higher paying jobs, fewer local residents will be able to afford to purchase homes. Thereby, promoting a lower quality of life for local residents.

The creation and impact of Air Quality Related Values (AQRV's) should also be identified in the technical report. Since the AQRV's have not been determined, it is impossible for the impact of the AQRV's to be understood. According to the technical report, the AQRV's can not be created until baseline data for the area has been created. The Forest County Potawatomi Community's Technical Report also states that the creation of baseline data has not commenced. Therefore, it is impossible for the long term economic, energy, social, health, and environmental impacts to be understood.

In summary, I request that the Forest County Potawatomi Community address the issues that will be facing communities and residents of the region. The redesignation process has not provided local communities time to adjust or address the issues that could be imposed in the near future.

The information that is provided in this report is not adequate for description or analysis purposes. The economic, energy, health, social and environmental impacts to each community within the 100 kilometer radius of the reservation must be carefully analyzed to understand the long term impact of the proposed Class I Air Redesignation Project.