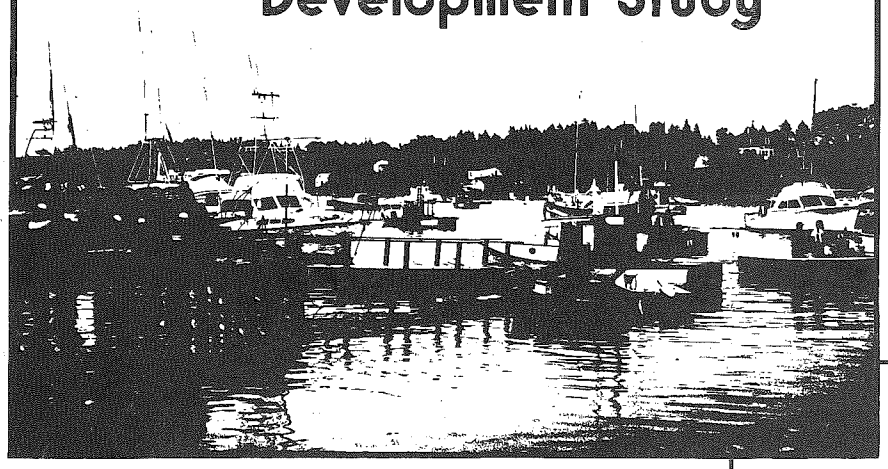
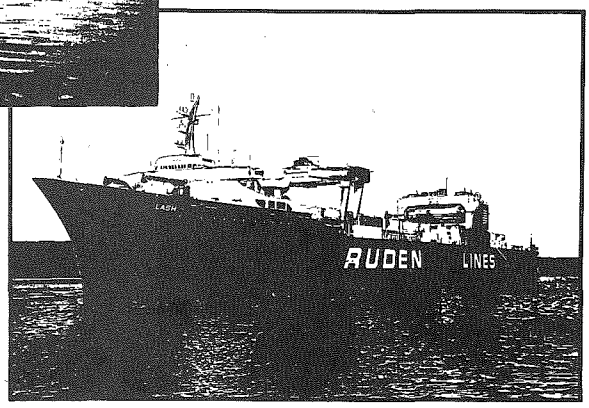
# Maine Port Development Study






# Executive Summary
# 1978



Maine Department of Transportation

Maine Port Development Studies

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Prepared by

the

Maine Department of Transportation



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Maine Port Development Studies

Executive Summary

## 1. STATEMENT OF THE ISSUES:

### (a) Introduction

The port communities located along the Maine coast constitute a major resource and economic asset of the State. The development of this asset is of great importance to the State as a whole and of critical importance to the port communities themselves. A number of state agencies have some degree of involvement in coastal development. This includes the Department of Marine Resources, the Department of Conservation, Bureau of Parks and Recreation, and Bureau of Public Lands, the Department of Environmental Protection, the State Planning Office, and the Maine Department of Transportation. In order to minimize duplication of effort and to take advantage of particular areas of expertise, an agreement was signed between the State Planning Office and the Maine Department of Transportation to establish the Maine Port Planning and Development Program.

The studies undertaken in this program are intended to provide guidance for state level activities in port development including the establishment of priorities for public investment in port facilities where warranted, as well as developing technical and financial resources to assist local and specific industry (private or public) port planning and development efforts. The Port Planning and Development Program is

supplementary to a number of coastal studies including Heavy Industry Sites and Tourism as well as plans that have been developed primarily by the State Planning Office over the last several years.

The initial step which has been termed Phase I, was to inventory existing facilities in as many Maine coastal communities as possible. Some 47 Maine coastal communities have been inventoried and the data published in two volumes. The first covering the coast from Kittery to Boothbay Harbor, and the second from Damariscotta-Newcastle through Eastport. The inventory also included ports on the Saco, Kennebec, Sheepscot, and Penobscot Rivers. The third volume published under Phase I is entitled "Planning Volume" and contains a summary of the inventory data together with eight suggested short term improvement projects, the description of a number of financing options, and the identification of areas in which further study appears to be warranted.

(b) The Issues

The reports which are the subject of this summary include the Phase I, Planning Volume, Forest Products Terminal Feasibility Study, Fisheries Port Facilities Study, and Institutional Changes in Maine State Agencies for Port Planning and Development. The issues addressed in these reports include:

(1) What port facilities are required and recommended

(a) To adequately handle the present and future waterborne commerce of Maine industry;

(b) To adequately handle the fish landings for the anticipated expansion of Maine's fishing industry; and

(c) To meet the recreational uses and passenger transportation needs of Maine's coastal and island communities.

(2) How such facilities are to be planned and financed and the extent to which State Government should be involved, and

(3) Institutional changes in State agencies to facilitate and accomplish recommended development.

2. BACKGROUND AND FACTUAL INFORMATION

(a) Cargo Handling Facilities

A tabulation of the tonnage handled by port and primary commodity group for Portland, Searsport, and the Upper Penobscot River ports (Bangor, Brewer, and Bucksport) has been developed for a 25 year period from 1950 through 1975. A summary covering all Maine ports for a similar period has also been developed. Significantly, the only ports to show an increase in traffic handled between 1970 and 1975 are Searsport, Cape Porpoise, Eastport, and Lubec Channel. In the latter three ports the increase results from fish handlings. The increase at Searsport, however, results from a combined increase in both bulk petroleum and dry cargo handlings. The improvement in facilities at Winterport has resulted in a significant increase in activity at that port resulting primarily from a large potato export. Port of Bath activity is related primarily to the Bath Iron Works Shipyard plus a significant amount of recreational boating. Eastport and Rockland are primarily fishing ports where significant amounts of both fin and shell fish are landed annually.

Part of the inventory process included a comprehensive study of the export-import traffic that originates and terminates in the State of Maine. The purpose of the survey was to provide a basis from which to determine the port facility needs of Maine traffic and whether it would be possible to assemble cargoes at Maine ports in sufficient quantities to support

scheduled sailings.

The survey revealed that State of Maine exports and imports combined totaled approximately 29M tons in 1976, as expected 28M tons was petroleum and petroleum products. Of the 1M tons of other cargo, approximately 13 percent was handled in containers.

Major import commodities other than petroleum are gypsum, salt, caustic soda, tapioca, sardines and lumber. It is significant that 86 percent of the dry cargo imports are handled through Maine ports, primarily Searsport. Containerized imports totaled 24,000 tons or 1,373 - 20 foot boxes.

Export traffic handled by Maine ports amounted to only 52 percent of the total of 483,599 tons in 1976. Maine exports fall into two primary commodity groups, the first being paper and forest products which totaled 203,282 tons in 1976 and food and food products which total 271,718 tons in 1976. In comparing these commodity groups, however, it should be noted that food products include 192,000 tons of fresh potatoes which has never been a consistent movement. Potato export depends upon crop conditions throughout the rest of the world which is uncertain at best. Containerized exports totaled 106,781 tons or 5,501 - 20 foot boxes.

(b) Fish Handling Facilities

Each one of the inventoried ports either has fish handling facilities or registered boats that are engaged in commercial fishing of one type or another. A summary of the data indicates that there are 152 fish handling facilities at the inventoried ports, 35 of which are engaged in

the exclusive handling of fin fish, 33 that are used exclusively for shell fish, and 84 that handle both. These facilities have a total of 2.6M square feet of dock area.

Inventory data combined with the data produced by the U.S. Army Corps of Engineers shows a total of 95,435 tons of fish landed at Maine ports in 1975. This includes 87,691 tons of fin fish and 7,744 tons of shell fish. The inventoried ports had 71 commercial fishing boats under U.S. Coast Guard registration and 2,151 other (lobster) boats.

(c) Recreation and Passenger Facilities

This area of port activity consists of recreational boating, the operation of coastal cruisers, and passenger transportation. Recreational boating in 1976 along the Maine coast included at least 25,000 privately owned and operated boats. Facilities to service these boats are found in virtually every port and harbor in the State.

Available data was summarized under two basic headings, privately owned facilities available for public use, and those facilities that are publicly owned and operated. The facilities involved include yacht clubs, marinas, boat storage facilities, public landings and public launching sites.

The privately owned facilities include a total of 21 yacht clubs providing 260 berths and 48 marinas with 1,703 berths. Thirty-six (36) of the marinas provide food and fuel and repair services.

There are 90 publicly owned docks or landings having 594 berths and 258 floats. Public boat launching facilities totaled 53, 46 being town facilities and seven state facilities. A total of 5,348 harbor moorings are identified in the inventoried ports.

Headboats (25+ persons) and charter boats (6-8 persons) operate from virtually all of the involved ports, with York, Kennebunkport, Portland, Boothbay Harbor, Bar Harbor and Eastport showing higher than average numbers. Coastal cruise boats of various sizes including the windjammers also operate from most of the ports. This activity is heaviest at York, Portland, Boothbay Harbor, Camden, Bar Harbor, and Eastport.

International ferry service to Nova Scotia is operated from Portland Harbor and Bar Harbor and service from Rockland, Lincolnville, and Bass Harbor is operated to the offshore islands in both East and West Penobscot Bay including Swans Island, Long Island, Islesboro, North Haven, and Vinalhaven. In addition, there is local service to the Islands in Casco Bay.

## 3. ANALYSIS - IDENTIFICATION OF PROBLEMS AND OPPORTUNITIES

### (a) Functional Classification

In order to provide a basis upon which the systematic classification of Maine ports can be made, a functional classification is suggested which include the following categories:

(1) Tons of cargo handled both liquid and dry

(2) Tons of fish including shell fish landed

(3) The number of passengers handled

(4) The number of vessel operations in each of the inventoried ports, as reported in the publication of the U.S. Army Corps of Engineers entitled "Waterborne Commerce of the United States".

Each port is classified not only by the level of activity but by the type of activity occurring, namely cargo handling, fishing or recreation, the objective being to designate those ports with a relatively high level of activity from those with a medium range of activity and those

with a relatively small range of activity by the primary activity. Accordingly, three classifications have been selected.

(A) Primary Commercial Ports which are those with the highest level of activity

(B) Secondary Commercial Ports - those would be the medium range ports, and

(C) Local or those ports having the lowest level of activity.

As an example, ports with an A classification are further broken down by predominant activity as follows:

A1 - cargo, A2 - fisheries, and A3 - recreation or passenger handling.

(b) Port Improvement Projects (Suggested for the Short Term)

Analysis of Phase I data indicated several port improvement projects that could be accomplished in the near term (3 to 5 years).

Project Selection Process

Short term port improvement projects have been suggested for eight of the inventoried ports; the basis of the recommended projects is that it must have a high potential for short term accomplishment. Key factors in the identification of potential projects were:

(1) Prior definition of the project

(2) Interest on the part of the community as evidenced by strong local support. Organization of a special committee or group to study and implement the project. Attendance at the meeting held by MDOT and the Consultant, E.C. Jordan Company, Inc.

(3) Project size that would allow construction in a short time frame and would be feasible from an economic point of view. The project could not be so complex that extensive study and design would be required

in order to get something built. This factor was assessed by the Department of Transportation and the consultant based on joint experience with port projects.

(4) A willingness on the part of the community, the private sector or a combination of both to accept some or all of the costs of the project.

Suggested Projects

Eight potential short term projects have been identified. The first four involve the construction and modification of shoreside facilities that will not be eligible for assistance from the Corps of Engineers.

| Port | Facility | Est. Cost |
|---|---|---|
| Cape Porpoise Harbor | Fish Pier | $800,000-$900,000 |
| Boothbay Harbor | Parking Lot, Remedial Rip-rap Protection | $15,000-$50,000 |
| Lincolnville | Ferry Service Parking Facility | $45,000-$60,000 |
| Belfast Harbor | Town Pier Extension | $200,000-$280,000 |

The remaining four projects will be eligible for assistance from the Corps of Engineers as follows:

| Port | Facility | Est. Cost |
|---|---|---|
| Searsport Harbor | Breakwater-Dredging | To be prepared by the U.S. Corps of Engineers if project is feasible |
| Bar Harbor | Breakwater-Dredging | To be prepared by the U.S. Corps of Engineers if project is feasible |
| Southwest Harbor | Dredging | To be prepared by the U.S. Corps of Engineers if project is feasible |
| Northeast Harbor | Dredging | To be prepared by the U.S. Corps of Engineers if project is feasible |

Each project is described in detail in the Planning Volume with a recommended approach for accomplishment. The project description was prepared by the Consultant E. C. Jordan Company, Inc.

(c) Financing Options

Several financing options for port development are discussed. Included is a description of the financial assistance available to the Bureau of Parks and Recreation for the establishment of recreation facilities together with examples of projects that have been approved or accomplished at Bath and Ellsworth.

The report also discusses the potential use of Economic Development Administration funds including public work grants, local public works, and technical assistance program grants. Examples of such projects include the facility at Jonesport which resulted in a total cost of $350,000 and included land, a marina and boat launching facility, 80 percent of which was provied by EDA and the remaining 20 percent by the State Boating Facilities Funds. A commercial fish pier at Milbridge was also used as an example designed for the offloading of seafood into tractor trailer trucks. This was funded by a split of 80 percent from EDA and 20 percent from local funds. A pending EDA project is the commercial fish pier in Lubec.

A description of the funding capabilities of the U.S. Army Corps of Engineers is included which relates primarily to harbor improvement projects. Examples of the Winter Harbor dredging and Portland Harbor dredging are described together with an explanation of the procedures to be used in obtaining Corps approval for harbor improvement projects.

Bond financing is discussed in some detail including general obligation bonds and revenue bonds. Examples of both methods of financing

are given using the proposed construction of a general cargo pier and oil terminal in Portland which was to be accomplished with revenue bond financing and the construction of facilities used by the Maine State Ferry Service in Penobscot Bay, which was provided by general obligation bonds.

Coastal development funds for predetermined or dedicated use are suggested for consideration using as sources, watercraft registration fees, harbor use fees particularly for the assignment of moorings, personal property tax fees resulting from the registration of recreation and fishing boats and a tax on fish landings.

Financing options are also discussed in connection with specific project recommendations.

(d) Cargo Handling Facilities

The export-import survey and the subsequent analysis of this data indicated that paper and forest products constituted about 40% of the total exports in foreign commerce from the State of Maine and that only about 30% of this tonnage was moving through either of Maine's two active cargo handling ports. The handling of a large percentage of this tonnage was determined to be a development opportunity that required further investigation.

Accordingly, a study was undertaken to determine the feasibility of constructing a new terminal aimed specifically at capturing a larger percentage of the forest products export tonnage with a general cargo handling capability. Both engineering and economic considerations have been closely coordinated throughout the course of the study. Existing ports which presently handle general cargo were examined for their suitability as the site for a port development project. Each was

evaluated regarding such characteristics as existing cargo facilities, land availability for new or expanded facilities, highway and rail access, depth of water and availability of other port related services.

These investigations revealed that Portland and Searsport are the most suitable as a site for a cargo port development project whether it be new facilities or an expansion of existing facilities. The economic analysis has determined that food products and related materials as well as forest products constitute a large portion of Maine's export and import traffic. However, as previously stated, a significant percentage of this traffic particularly export traffic is presently moving through ports other than Maine including St. John, N.B., Boston, MA, and New York, NY. Within Maine, Searsport was found to handle far more general cargo (excluding bulk petroleum) than any other port in the State including Portland.

The potential for Maine ports to attract traffic from other origins outside of the State (Hinterland) has been examined and determined that for all practical purposes Maine ports will be limited to those cargoes originating or terminating within the State at least initially, if new or improved facilities are provided. The report also finds that in the long term, unless such facilities are provided, the existing level of cargo handling activity will decline to the point where it will be practically nonexistent because of the obsolescence of facilities. It should be pointed out, however, that this does not take into consideration the development of property in Portland by Paul Merrill.

Within Maine, the Port of Searsport offers a three to one advantage over Portland on a geographical basis in the amount of cargo that could

reasonably be attracted by new or improved facilities.

(e) Fish Handling Facilities

The fishing industry clearly presents one of the most promising opportunities for development along the Maine coast. The effects of the 200 mile limit and the exclusion of the foreign fleet from the George's Bank area contribute greatly to this opportunity. It appears however that the existing physical facilities, primarily piers are generally inadequate for the industry to effectively respond to this opportunity. The recommendation of specific development strategies should be made after further studies of the economics and practices of the industry and the requirements that the 200-mile limit will impose upon us. Such a study has been undertaken and will be reported upon separately.

The generally poor availability and condition of the physical facilities that the industry depends on for its existence does not reflect the importance of maintaining a prosperous fisheries economy in Maine. Adequately equipped piers that are in good structural condition are very costly with only a limited number of publicly owned piers available in relation to present and anticipated future demand. Private piers are sometimes used as leverage to influence trade patterns of fishermen. In addition the planning, funding, and operation of fish piers involve a high level of cost which the fishing industry has had difficulty meeting because of wide fluctuation in profits.

It also appears that the inadequacy of pier facilities is increasingly becoming an obstacle in transporting fish to processors or

markets from the boats. This condition is also hampering gear handling and other necessary vessel services. Further, it is understood that larger boats are being built or planned at this time which will employ the latest technology for harvesting fish and will require adequate docking facilities. As a consequence of the expanded opportunity, substantial increases in production are anticipated somewhere in the order of three to four times the current level. Therefore, one of the most important issues facing the industry is the early assessment of the impact that the 200-mile limit will have upon Maine's fish handling facilities.

A number of communities have already taken steps to acquire positions of advantage for the anticipated growth. Portland is actively studying the development of a large fish pier. Plans for cooperative fish piers are being considered at Kittery, Cape Porpoise, Stonington, Lubec, and Eastport.

(f) Institutional Changes in State Government

In order to assure that potential opportunities are seized, and that the problems which accompany port development are minimized, there is a need to make some changes in the institutional structure which currently handles ports. This conclusion is part of a specific study of the institutional problems in state government made by the State Planning Office. Such changes should demonstrate clearly the State's concerns for all aspects of its ports, and the commitment to seeing that future port needs will be met. Changes are also necessary because existing laws and practices do not fully reflect the importance of ports in the State's economic system.

There are five basic changes which it is desirable to make in existing institutions and enabling law to insure that there is:

(1) An agency with full, statewide authority for all aspects of port planning and development.

(2) An agency with flexible capabilities in the areas of funding of new port facilities, including the power to issue revenue bonds or, if necessary, recommend the issuance of general obligation bonds, and to provide matching shares for federal grants.

(3) An agency with ties to other agencies of state government concerned with ports, including the Departments of Marine Resources, Environmental Protection, Conservation, and the State Development Office.

(4) Specific authorization to allow the agency to assist communities with engineering and economic assistance in various port development projects initiated at the community level.

(5) Adequate staff and funding to enable the agency to assist communities, develop overall port plans for the State, and to design, construct, and operate such facilities for general cargo handling or fishing as may be determined to be necessary.

(g) Other Concerns and Opportunities Requiring Further Study

The Planning Volume also contains a detailed explanation of the following areas in which further studies appear to be required as a result of the Phase I effort. These include:

(1) Dredging Spoils Disposal

The selection and recommendation of dredging spoil disposal

sites. This study is recommended as a result of what appears to be a fairly extensive amount of maintenance or new dredging requirements in most Maine ports to accommodate larger fishing vessels and larger and more recreation type boats. Disposal sites, however, are very difficult to select on a project by project basis. The objective of the proposed study would be to identify a number of sites along the coast that most coastal interests could agree to in advance.

(2) Coastal Cruise Ship Operations

An identification of the port facilities necessary to encourage the growth of recreational cruise ship operations on the Maine coast.

(3) Ferry Service

This study would include an evaluation of present and future ferry service needs in areas such as scheduling, fare structure revisions, analysis of existing vessels and a vessel replacement program.

4. ALTERNATIVE COURSES OF ACTION:

(a) Cargo Handling Facilities

Based upon the engineering and marketing analysis, five alternative courses of action have been considered.

(1) A new facility in the Searsport area.

(2) Upgrading the existing facilities at Searsport.

(3) A new facility at one of two locations in Portland.

(4) Upgrading of the existing Maine State Pier in Portland, and

(5) The "no build" or "do nothing" alternative.

The consultant has recommended the construction of new facilities at Searsport with the preferable location being on Sears Island.

The two sites considered in Portland for new construction were the present Portland Terminal Wharf No. 3 site which is located on property roughly between the Million Dollar Bridge so-called and the U.S. Route 1 or Veterans Memorial Bridge along the Fore River. The other site is the former Canadian National Pier site, on land which is now owned by the Maine Department of Transportation.

It was determined that the Searsport location offers substantial advantages over the Portland area and other ports considered in this study in regard to market potential. Searsport presently handles substantially more non-petroleum cargoes than Portland and has a fairly solid cargo base upon which to build.

On a geographic basis, Searsport appears to have a three to one advantage over Portland in potential import and export cargoes originating from or destined to points in Maine. That is to say, it is more centrally and advantageously located in regard to exporters and importers. Portland's traffic base and its location in regard to the paper industry is less advantageous. In 1976, for example, approximately 70 percent of the State's waterborne forest products exports, that is to say paper and other products, came from Penobscot and Washington Counties, while nearly all of the forest products imports were destined to Penobscot County.

The Sears Island location has immense development opportunities for cargo handling facilities as well as the location of other industries

which may have a need or desire for a location close to waterfront facilities. Over 300 acres of land are available on the Island for such purposes and are exclusive of the land to be used by Central Maine Power Company in the development of its coal fired generating station. The sites in Portland, on the other hand, do not offer such long range growth potential. They are more limited in size, being approximately 50 acres each much of which is water area and are further constrained from expansion by various types of adjacent development. While Portland's sites would be adequate to serve today's needs, their long range expansion potential appears to be far more restrictive, perhaps even prohibitive, than the Sears Island site.

Another primary advantage of the Sears Island location is the deep water available along side the berth which is approximately 40 to 45 feet. These depths could not be obtained in Portland without dredging. This advantage is important as the trend is to a deeper draft cargo vessel and dredging is becoming more and more difficult under existing government policies.

In addition to the other advantages, a facility at Sears Island is estimated to cost approximately $41M which is significantly less than the cost estimated for the construction of a comparable facility at the Canadian National/MDOT site in Portland of approximately $90M. The cost of constructing a facility at the Portland Terminal No. 3 site of $30M to $35M is in addition to significant off-site costs. Furthermore, Portland Terminal No. 3 site is considered to have physical and operational disadvantages when compared with Sears Island.

(b) Institutional Changes in Maine State Government Agencies

There are two basic options for establishing an agency which would meet anticipated port planning and development requirements. The first is to use the existing structure within the Department of Transportation with appropriate modifications to the laws establishing the Department and the Maine Port Authority. This option would assign the development and operating functions for all facilities to the Bureau of Waterways. The current Port Authority would be expanded to be representative of other areas of the State (besides Portland and South Portland) and would continue to have its basic function of deciding where and when to fund facilities. The Port Authority would be given specific authorization to recommend general obligation bonds to the Legislature and the Governor, and to provide the State's matching share of federal grants.

Option 2 is to create a separate agency, to be called the Maine Port Authority, which would have all the function of the current Maine Port Authority and Bureau of Waterways combined and would be separate from the Department of Transportation. The Port Authority would have a staff of its own assigned to the various roles in port planning, development, and operations which the Authority would undertake in assisting communities and developing its own facilities as required. The Port Authority Board would have essentially the same powers as the Board under Option 1.

Option 1 has the advantage of being somewhat lower in cost, since there would be some savings on administrative overhead and other specialized services (legal, right of way appraisal, etc.). However, keeping the ports' function within DOT has the disadvantage of maintaining two

agencies dealing with ports and consequently potential confusion as to the clear central responsibility for ports. Creating a single port agency (Option 2) would make the commitment to ports unequivocal and provide a single agency with a single responsibility. However, such an agency would be somewhat more expensive since administrative overhead would have to be provided and specialized services would have to be contracted for.

5. RECOMMENDATIONS

(a) Cargo Handling Facilities

The Consultant Fay, Spofford and Thorndike, Engineers, make the following findings and recommendations based upon the feasibility study of new or expanded cargo handling facilities in Maine:

- That, unless new or improved cargo handling facilities are provided increased cargo activity cannot be expected to occur and the existing level of such activity will decline over the years, practically to the point of nonexistence because of obsolete facilities.

- That provided adequate financial arrangements can be made, a major new cargo handling facility be constructed on the southwest quadrant of Sears Island in the Port of Searsport that is capable of handling both containerized and break-bulk cargoes with transit and storage sheds, wide working apron and both rail and truck access — estimated construction cost $41 Million (1977 dollars).

- That such construction not be undertaken unless a financing package can be developed by the Maine Department of Transportation that may include a combination of general obligation bonds, revenue bonds, EDA grant and/or loan and long term leases or other financial commitments from major port users and operators.

In addition, the following recommendations are made:

- That any alternative or subsequent general cargo port development having state financial involvement be confined to two or possibly three port areas.

- That general cargo port handling facility planning and construction that is developed in whole or in part with state funds be undertaken by the Department of Transportation.

- That all cargo port handling facilities requiring public investment be subjected to cost effective analysis in order that public financing sources will have a clear picture of the type of investment required.

(b) Institutional Changes in Maine State Government

- It is recommended that the required changes be made in existing laws so that the port planning and development functions remains within the Department of Transportation (Option 1). It is believed that the functions of an expanded port agency can be adequately performed by DOT and that the lower costs for this option make it the more desirable.

Throughout the study it has repeatedly been made clear that the coastal municipalities want and expect to be the initiator of and make their own decisions about port and harbor development projects. These municipalities also indicated that they would welcome technical and where available financial assistance from the State. Accordingly, it is recommended:

- That the Maine Department of Transportation initiate a community assistance program to provide technical assistance upon request of the community in the development of port improvement projects and the processing of such projects with the necessary State and Federal agencies.

(c) Fish Handling Facilities

The following strategies for the development of fish handling facilities are offered for consideration:

- Physical facilities, especially pier facilities, play a crucial role in the operation of the commercial fishing industry not unlike the relationship of airports to aviation.

- Pier facilities currently represent a major problem to the development of the industry.

- The nature of pier facilities in terms of cost and usage make them a likely candidate for the type of public support generally made available to other public facilities such as airports, cargo piers, etc. in the areas of planning, construction (funding), and operations.

(d) Recreation and Passenger Facilities

The following strategies for the development of recreation and passenger handling facilities are recommended:

- That the towns continue to be the primary planner-initiator of port improvement projects involving recreational facilities.

- The Department of Conservation, Bureau of Parks and Recreation continue to acquire, develop, and operate access sites in coastal communities in accordance with its 1976 "Public Facilities for Boats Plan".

- The Bureau of Parks and Recreation and the Department of Transportation cooperatively provide technical assistance to communities upon request in the development of data to support the construction of new or a modification of existing facilities and harbor improvement projects.

- That an effort be made by the State Development Office or other appropriate agencies to encourage the development of privately owned recreation facilities in those coastal communities that now have a high level of recreation activity and those communities who wish to encourage this type of development.


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