From: Jackson, Peter < Peter. Jackson@idwr.idaho.gov>

Sent: Wednesday, October 29, 2025 1:52 PM **To:** Lori Hunter hunter@valleycountyid.gov

Cc: O'Shea, Maureen <Maureen.OShea@idwr.idaho.gov>; Cynda Herrick <cherrick@valleycountyid.gov> **Subject:** RE: Public Hearing - Revisions/Amendments to Valley County Comprehensive Plan & Valley

County Code

Lori,

IDWR understands that the only proposed change to your Title 11 Flood Control, is to remove the *City of McCall Impact Area* from 11-1-3: General Provisions: Section A. IDWR takes no exception to this minor change.

Please submit any other proposed changes to IDWR for review.

IDWR appreciates keeping us in the loop on your code changes. Cheers,



Peter Jackson, CFM
Idaho Dept. of Water Resources
State Floodplain Manager/NFIP
Coordinator

Office # **208-287-4973** Cell # 208-912-5123

<u>Peter.Jackson@idwr.idaho.gov</u> https://www.idwr.idaho.gov/floods/



Valley Soil & Water Conservation District

P.O. Box 580 Cascade, Idaho 83611 Phone: (208) 382-3317

November 12, 2025

Valley County Commissioners c/o Cynda Herrick Valley County Courthouse 219 N. Main Street Cascade, ID 83611

Re: Valley County Comprehensive Plan Valley County Code

Honorable Valley County Commissioners,

Valley Soil and Water Conservation District submitted suggested revisions to the Valley County Comprehensive Plan and County Code in a letter dated June 30, 2025. We are pleased that many of our recommendations—particularly those that strengthen protections for water quality—have been incorporated into the documents before you on December 1, 2025, Revisions/Amendments to:

- Valley County Comprehensive Plan
- Valley County Code

Although the revisions do not mirror every item we proposed, the updated standards represent a meaningful improvement. For these reasons, Valley Soil and Water Conservation District supports the proposed amendments to the Valley County Comprehensive Plan and Valley County Code and we recommend your approval.

We welcome the opportunity to continue collaborating with Valley County on future plan and code improvements as needs and conditions evolve.

Respectfully,

Art Troutner, VSWCD Board Chair

Valley Soil & Water Conservation District Board of Supervisors Art Troutner, John Lillehaug, Judy Anderson, Bill Leaf and Colt Brown



www.mccall.id.us

44 (au invasor)

Phone 208-634-7142

This 200, 63 A 3038

November 21, 2025

Board of County Commissioners 219 N. Main Street Cascade, Idaho 83611

RE: McCall City Council Comments - Valley County Comprehensive Plan and Code Updates (Public Hearing: December 1, 2025 at 1:15 pm in Cascade)

Dear County Commissioners,

On behalf of the McCall City Council, please accept the following comments regarding the proposed updates to the Valley County Comprehensive Plan and Valley County Code (Ordinance 2025-07). We appreciate the opportunity to participate in this important discussion, as these updates to the Comprehensive Plan and Codes will directly affect the areas surrounding McCall's city limits and, by extension, our shared economy, environment, and community character.

Since Valley County has chosen to administer planning and building services within the area formally known as the McCall Area of Impact, applying the Valley County Comprehensive Plan and Codes rather than the County adopted McCall Area Comprehensive Plan (2018) and its corresponding Impact Area Codes for Building, Planning and Zoning, and Subdivision and Development, we believe it is essential to highlight several key concerns.

The McCall Area Comprehensive Plan and Codes, jointly adopted by Valley County and the City of McCall in 2018, were developed through extensive community engagement and technical analysis. These documents reflect the community's shared vision, goals, and policies for smart growth, environmental stewardship, and economic opportunities for the McCall Area. The 2018 Plan has successfully guided decisions on development, redevelopment, capital projects, and infrastructure investments for the past several years. Most importantly, it represents the community's voice with a long-term, strategic framework that ensures critical decisions remain aligned with the priorities of residents, businesses, and visitors.

The proposed Valley County Comprehensive Plan appears to primarily update an antiquated previous Comp Plan with essentially no public involvement. It includes history and description of existing conditions, but it does <u>not</u> provide a vision statement, forward-looking strategies, specific goals, or actionable implementation tools other than those described in Chapter 14. Many of its objectives rely on broad terms such as "encourage," "promote," and "strive." This language lacks clear policies, strategies or programs necessary to achieve measurable outcomes. This language related to the Future Land Use Map is an example of the specificity needed for planning or any meaningful land use management:

Long-Range Growth Types include Agriculture, Commercial, Industrial, Residential, and the Scenic Byway. Future land use should be directed to the appropriate vicinity; but this does not disallow other types of uses (p.92).

The plan also omits the past two decades of regional planning collaboration with the City of McCall, the community, and the resources invested to create a Comprehensive Plan 1 and the regulatory standards to implement the Plan for the McCall Area. For example, the proposed Valley County Comprehensive Future Land Use Map designates wide areas as "Residential," which conflicts with stated goals to "retain the rural and small-town character of Valley County." Allowing one-acre lots under this classification anywhere in the County produces a suburban development pattern, not a rural one. This sprawl pattern of development is not a financially sustainable model given the public services needs verses the tax base generated (Costs of Sprawl, 2000, TRB/TCRP Report 74, Burchell et al.).

We appreciate the County's inclusion of some updated standards such as: Driveway and access safety requirements, Best Management Practices (BMPs) for stormwater and erosion control, the Riparian Area Overlay Zone, Wildland Urban Interface (WUI) fire protection standards, and Countywide application of flood control measures.

These are positive steps; however, they serve as minor changes rather than the comprehensive reforms needed. The underlying structure of the County's land-use management system, based on a single Multiple Use designation and a conditional use permit (CUP) process, for almost all development remains a reactive model rather than a proactive planning framework. Valley County's continued reliance on 'performance-based zoning' or a CUP/Compatibility process as the primary land-use tool is a legacy of 1970s rural land management which is now rare among counties experiencing growth pressures. While the system once worked for large landowners and low development demand, today it presents several significant disadvantages:

- Unpredictability: Any use can be proposed anywhere, creating uncertainty for residents, developers, and decision-makers.
- Lack of Policy Linkage: Without mapped zoning or regulatory overlays, Comprehensive Plan goals (e.g., village centers, gateway corridors) cannot be effectively implemented.
- Inequity: CUP outcomes can vary by commission composition or applicant resources, leading to inconsistent decisions.
- Design and Character Gaps: No design standards or compatibility criteria exist to protect community gateways or scenic quality.
- Administrative Burden: Every proposal, even minor, requires staff analysis and a public hearing making it inefficient for both applicants, staff, and the public.

¹ McCall Area Comprehensive won two awards for planning (Idaho APA Outstanding Plan Award, Idaho Smart Growth Grow Smart Award for Public Outreach.

Infrastructure Planning: Without base zoning densities, long-term infrastructure needs and public service costs are difficult to forecast.

Based on our review, the City of McCall finds the proposed Valley County Comprehensive Plan and Code are inadequate to effectively manage private or public land use and growth in the McCall Area. We respectfully recommend Valley County:

- Continue to apply the McCall Area Comprehensive Plan (2018) as the long-range plan for the McCall Area, or incorporate it as an addendum or appendix to the updated County Plan.
- Administer the existing McCall Impact Area Code, already adopted by Valley County, with a McCall Area Overlay to ensure consistency with established policies and standards and expectations of the landowners.
- Initiate a comprehensive rewrite of the County Plan and development code in partnership
 with its cities and the public, using current planning concepts, graphics, and robust public
 engagement; a best practice in Community & Regional Planning.
- 4. Evaluate the long-term effectiveness of the performance-based zoning or the conditional use permit system as the County's primary land-use tool and consider a modernized framework with clear zoning districts or overlays and standards for predictable growth management.

The City Council urges the County to strengthen its Comprehensive Plan and Code updates to reflect those values representative of the McCall Area community, incorporate proven planning practices, and build on the success of our regional collaboration and planning. Thank you for the opportunity to provide these comments. We look forward to continued partnership for the benefit of our residents and the long-term prosperity of Valley County.

Sincerely,

Robert S. Giles

Mayor, City of McCall on behalf the McCall City Council

A Hiles

From: Chanel Bailey

Sent: Tuesday, November 4, 2025 10:44 AM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Cc:

Subject: Regarding county codes

Good afternoon,

First and foremost, we want to extend our sincere thanks to everyone at the county who has worked so diligently on matters related to the impact area in McCall. We are the Bailey family, and we truly appreciate the outcome of being part of the county. It's clear that the state has prioritized landowners' rights and interests, and we're grateful that the county has aligned with the legislature in this regard.

Our family has owned parcel RP18N03E053321 since 2020. Unfortunately, being part of the city has been inconvenient due to restrictive codes that limit how we can use our land. For example, we were not allowed to park a camping trailer on our nearly two-acre lot. My uncle, who originally purchased the property, fell in love with it for its seclusion and the absence of CCR restrictions.

We are an outdoors-loving family, and our young children thrive when they have space to play and explore. While we're not currently able to build on the property, we hope to do so in the future. In the meantime, we simply wish to use it recreationally—especially during summer and fall weekends—so our kids can enjoy nature and just be kids.

We're incredibly thankful that county code allows for one camping trailer and recreational use of the land. This not only gives us the freedom to enjoy our property but also helps us save over \$100 a month in trailer storage fees. It never made sense to us that we couldn't store anything on our own land.

As you continue working with the city, we respectfully ask that county land use codes remain unchanged. We believe landowners—especially those not in subdivisions—should have the right to enjoy their property without unnecessary restrictions. Of course, we understand the importance of maintaining standards and would never turn our land into a junkyard. We're just a small family hoping to enjoy the space we've invested in, even if we don't yet have a house on it.

Thank you for taking the time to read this. We hope this message reaches the appropriate person involved in shaping county codes, and we sincerely hope those policies continue to support responsible land use and ownership.

Warm regards, The Bailey Family

Friends of Lake Cascade 250 3rd Street Cascade, ID 83611

November 10, 2025



Valley County Commissioners

c/o Cynda Herrick 219 N. Main St. Cascade, Idaho 83611

Subject: Proposed Revisions/Amendments to Valley County Comprehensive Plan and Code

Friends of Lake Cascade commends Valley County for the thoughtful revisions proposed to the Comprehensive Plan and County Code. Many of the updates reflect the collaborative work undertaken to advance these documents and demonstrate a clear commitment to enhancing safeguards for water quality and watershed health. The inclusion of more updated standards is an encouraging step toward ensuring that land use and development decisions align with long-term environmental stewardship.

While the revisions do not capture every concern raised over the past few years, they reflect meaningful progress to provide a stronger foundation for addressing current watershed challenges and set the stage for continued improvements. As Valley County experiences population growth and faces increasing environmental pressures, we believe additional upgrades will be essential to ensure the resilience of our watershed and the sustainability of our community for future generations.

For these reasons, Friends of Lake Cascade supports the proposed amendments/revisions to both the Comprehensive Plan and the County Code. We view them as a positive step in the right direction and welcome the opportunity to continue working alongside Valley County to refresh and strengthen these guiding documents as conditions evolve.

Respectfully Submitted,

Lenard D. Long

Friends of Lake Cascade

(Representing 3,000+ concerned lake enthusiasts)

From: Becky Gillette

Sent: Friday, November 21, 2025 5:12 PM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Cc: Eric Young

Subject: 2025 Comprehensive Plan Update - Strive to become a Dark Sky Reserve

November 20, 2025

RE: 2025 Comprehensive Plan Update - Strive to become a Dark Sky Reserve

Dear Valley County Commissioners,

We wish to commend the Valley County leadership for the addition of the "Strive to become a Dark Sky Reserve" objective in the Draft Comprehensive Plan. This is a laudable objective, and we heartily support this addition. Valley County is losing its natural night skies, which is negatively impacting residents and local and regional economies. Preserving the natural night environment by reducing light pollution will provide benefits to wildlife, ecosystems, human health, tourism, and any person who seeks unspoiled night skies for enlightenment, enjoyment, and scientific pursuits.

There are many requirements to obtain this objective, including adhering to specific lighting standards, demonstrating an ongoing educational effort in support of night sky protection, and building partnerships with landowners and managers within the proposed Reserve boundaries. Based on this, we would like to propose the following wording be added to this objective:

- Strive to become a Dark Sky Reserve.
 - Review and update the Valley County Outdoor Lighting ordinance to ensure alignment with International Dark-Sky Association requirements.
 - Initiate educational efforts directed toward business owners, residents and visitors to increase understanding of and support for night sky protection.
 - Initiate communications with local and regional land management agencies and private landowners to build support for a future Reserve designation.

Taking these three implementation steps will set the County on a strong path towards a future Reserve designation. Including them in the Comprehensive Plan will allow the proper attention and resources to be devoted to this important issue.

Thank you very much for your time and consideration.

Sincerely, & Sincerely, Becky Gillette and Eric Young

From: Jeannie Carpentier

Sent: Thursday, October 30, 2025 6:40 PM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Subject: Comprehensive Plan

Hello Mr. Roberts,

Thank you for conducting the recent public meeting regarding the Valley County Comprehensive Plan. I attended and offered the following simple testimony:

- 1. I believe that additional data collection and process would improve the planning process.
- 2. I believe that a simple multiuse zoning overlay is insufficient and will have the undesired effect of creating a comprehensive plan one proposal at a time.
- 3. I believe that it is time for Valley County to consider professional assistance in building a Comprehensive Plan.

I wanted to follow up with you to make a broader set of comments that reflect the position of our community, along with an offer to help in any way possible. have experience in the planning process and understand the difficult nature of balancing all of the various perspectives.

I offer comments in bullet point format to be as brief as possible but make essential points.

- 1. The rate of change in conditions in Valley County since 2020 demands a complete revision of the Comprehensive Plan. Incremental changes to the 2018 plans will not reflect the dramatic increase in individual, business, and developer interest in Valley County. I believe a revised plan must be extremely clear about values, objectives, and planning guidelines in this context.
- 2. <u>Valley County should strive to be a role model in Idaho planning,</u> achieving plan scores based on the Idaho Local Land Use Planning Act (LLUPA). The current Comprehensive Plan has a below average rating and well below targets.
- 3. The Valley County Vision should be to retain its visual, rural, agricultural, and ranching character that is the core reason it has garnered so much interest in the first place. Visual corridors, broad open spaces, wilderness preservation and access, and careful selection of development areas are essential to achieving this vision.
- 4. Valley County needs detailed zoning plans in order to achieve the vision for Valley County. Flexible zoning designations will simply allow the plan for Valley County to be developed one proposal at a time, providing no guidance and therefore a low probability of achieving our vision.

- 5. Valley County has to engage in a multijurisdictional planning process that responds to the diverse perspectives of the cities, agencies, and planning organizations that should have their voice reflected in the Comprehensive Plan. It is clear the current plan is very far from achieving this goal.
- 6. Valley County must shift to a scarce resource perspective, acknowledging that there will be insufficient water, land, recreational, and infrastructure resources available to serve the likely future demand. Valley County must immediately transition to a planning process that anticipates and manages demands for land use that are incompatible with our vision for Valley County and our infrastructure constraints.
- 7. <u>Professional help is required to build a new Comprehensive Plan.</u> The magnitude of the challenges and the timing required to build a plan suggest you should retain professional help to build a new Comprehensive Plan in a timely fashion.

This community is comprised of private land owners, residents, and small business operators and they are not anti-growth people longing for yesteryear. We have all seen and experienced regions that have done a poor job handling the dramatic rise in activity since 2020, and those that have done remarkably good jobs. I feel it is not too late for Valley County to become a planning role model, and to preserve and enhance our community for current residents as well as future residents that appreciate what has drawn us all to this wonderful place.

My offer to help is sincere. Please let me know how I can help.

Respectfully,

Jeannie Carpentier

From: Jeannie Carpentier <

Sent: Monday, November 24, 2025 3:31 PM

To: Cynda Herrick <cherrick@valleycountyid.gov> **Subject:** Valley County Comprehensive Plan

Chairman Maupin, Commissioners Thompson and Caldwell,

I am deeply concerned that we are editing a Comprehensive Plan that was developed in 2018. So much has happened since then that, in my mind, it requires an entirely fresh look at our area from a broader perspective of what we want our community to look like ten years from now.

I can only judge the outcomes of the current Comprehensive Plan based on what I see as a citizen. Multiple sprawling development proposals from out-of-area developers, a jungle of commercial and storage development along the corridor into McCall that destroys the look and feel of the entrance to our community, traffic gridlock, infrastructure stretched to the limits, and young families and working families having to move elsewhere because our area has become unaffordable.

There are so many towns that have succumbed to all of these pressures, becoming something that really nobody wanted. They just go there because there was insufficient planning and, more importantly, insufficient will to take a more difficult path, one towards a better community designed for the benefit of the community.

I am strongly opposed to approving the revised Comprehensive Plan because I think we need a fresh look at where we are and where we want to be, and because I think it is time we get some professional help in building a plan for the future.

Jeannie Carpentier

Please confirm receipt of this letter and its inclusion.

To:

Valley County Commissioners

Katlin Caldwell, Sherry Maupin & Neal Thompson

From: Rebecca & Scott Hurd

1505 Chris Lane McCall, ID 83638

Date: November 23, 2025

Re:

Opposition to Approving Draft Revisions to Valley County Comprehensive Plan and

Valley County Code

We write this letter in opposition to the draft revisions to the Valley County Comprehensive Plan and Valley County Code.

Per the December 1 Public Hearing notice, you have received all letters submitted for inclusion in the staff report for the Valley County P&Z Commissioners' October 23, 2025 public hearing.

There are many letters in opposition, including ours, to the draft revisions to Valley County Comprehensive Plan and Valley County Code.

Our hope is that prior to the December 1 Public Hearing you will:

- review the drafts, which we have.
- read each letter, which we have.
- watch the October 23 public hearing, which we have.
- watch every workshop the P&Z Commissioners had on this topic in 2025, which we have.

While there have been discussions and workshops prior to 2025, which we have reviewed, it is important to review the body of work for the current five P&Z Commissioners.

- meet with each P&Z Commissioner to have a dialogue around either their vote in favor, or in opposition to their own work product, which we do not have direct access to do so, nor any place to do anything with what we hear.

Yet you do. These individuals are your appointees and your advisory body.

Commissioner Chairman Ken Roberts and Commissioner Ben Oyarzo voted AGAINST approving their own draft. Commissioners Ben Mabe, Carrie Potter and Heidi Schneider voted FOR approving their own draft.

A 3-2 split on their own work product is cause for alarm. It is a strong signal to pause and NOT approve these drafts.

Key concerns include:

- Absent in the draft Comp Plan are any strategies to reach the stated goals. There is no documentation of what it will take to achieve these goals.
- This draft plan does not protect Valley County open spaces, timber, wildlife travel corridors and agricultural lands.
- The draft "Future Land Use Maps" on pages 92, 93 and 94 need to be removed entirely if you decide to go forward with this draft. This is the first time maps of this nature are included. As is, they pave the way for developers through the large swatches of purple/residential development throughout the county. If any future growth maps are included, they must be created after extensive and direct engagement with current property owners. This is not achieved through a public hearing.
 - In addition, any future development projections must be co-created with individuals outside of Valley County's P&Z staff and Commissioners. They need input, insights and data. The maps must factor in other long range planning documents, including but not limited to the County Master Transportation Plan, The Fire Protection Plan, The Valley County Waterways Management Plan, The West Central Mountains Regional Housing Needs Assessment, the conclusions of the in progress BSU Resilience Assessment.
- The draft plan is riddled with vague, subjective and non-enforceable language. There is a heavy use of "promote," "consider," and "encourage" versus clearer and stronger verbs such as "require," "must complete," "evaluate," "monitor and report" and "establish."
- The draft plan does not include any clear and firm language to encourage growth near current infrastructure, which will reduce long term costs for county residents, decrease wildfire risks, protect open spaces, and preserve waterways, riparian and wildlife corridors.
- The proposed changes to County Code 9-4-2: Policy changes the purpose of the Comprehensive Plan from preserving "the open characteristics and scenic beauty of the county" to "the purpose of the plan and analysis is to guide development..." These changes emphasize future development over the current Plan's objectives to "preserve agricultural land for farming and allow nonfarm development in rural areas only when it does not interfere with ... agriculture.' The proposed changes also refer to the Plan "a general guide" which weakens the Comprehensive Plan application.

Please slow this process down. Together we can create a roadmap for future growth and development in Valley County to guide public and private decisions. Together we can create a collective vision for our community's future, including land use, infrastructure, and services.

TO: Valley County Commissioners, c/o Cynda Herrick cherrick@valleycountyid.gov

FROM: Sheree Sonfield, 664 Woodlands Dr, McCall Idaho

DATE: November 23, 2025

RE: Public Hearing Comment for Revisions/Amendments to: Valley County

Comprehensive Plan and Valley County Code Hearing on Dec 1, 2025

I oppose this plan and code amendments as presented. This is not a plan with sufficient guidelines and supporting code, it has not had sufficient public input nor time to put together such an important set of documents with adequate thought to the future of Valley County. This plan and related code should be something to guide the County far into the future but it is shortsighted, insufficient and requires more time and input.

My biggest issue is with the County Code 9-4-2: Policy, because it changes the purpose of the Comprehensive Plan from preserving "the open characteristics and scenic beauty of the county" to "the purpose of the plan and analysis is to guide development...".

The entire reason that so many people want to attempt to live and spend time in our County is because of its natural scenic beauty, open spaces, forests, rivers, lakes and outstanding recreational opportunities. These characteristics must absolutely be a primary focus of a comprehensive plan, they must be preserved for the enjoyment of everyone. If not, then a) negative impacts cannot be undone and b) we've done a huge disservice to ourselves in our own community as well as to all the new residents and visitors.

Growth is inevitable, but we cannot prioritize growth by saying that "purpose of the [comprehensive] plan and analysis is to guide development...". That's completely backwards. First, preservation of the natural resources and amenities must be a priority, then establishing reasonable and "smart growth" guidelines and policies.

I'm so disappointed in the entire proposal. It lacks community input, strategy, thoughtfulness by more than just a few people. It is certainly not "comprehensive".

Indicative of my view, 2 of the P&Z members did not approve of it.

Go back, start over, get the public input and do it correctly.

Thank you for listening to my viewpoint.

November 22, 2025 Delivered via E-mail

RE: Comment on Draft Valley County Comprehensive Plan Amendments

Dear Commissioners,

I am opposed to the proposed changes in the Comprehensive Plan. Previous planning documents have stated focus and objectives based on "...protecting property rights and property values...", "discouraging urban sprawl...", "...minimizing adverse impacts...", "...maintaining open space...", with those values intended to be used to guide decisions. Current residents have invested millions of dollars based on those guiding values and our investments are at risk when commissioners make decisions that radically change land use based on random proposals. A blanket mixed use land designation represents no plan at all.

Significant disjointedness exists between the numerous planning documents adopted by the county. Developing continuity between those documents is important if they are to provide usable guidance. I have nearly 40 years of municipal infrastructure planning and engineering experience (35 in Idaho). In that time, I have observed that when governmental bodies neglect to follow planning documents costly and contentious mistakes are made. Infrastructure engineering and construction are costly. Only adequate planning can prepare entities to address growth issues and spend their limited funds wisely. Addressing discontinuous urban sprawl, after it happens, will be extremely costly to existing county and city residents when public safety issues arise due to water quality degradation or transportation deficiencies. Additionally, adequate and proper planning are necessary to identify features that should be funded and constructed by development and not later by residents.

The city versus county impact area land planning situation developed by the Idaho State Legislature appears to be tailor made for rapid and inadequately planned development within ex-city impact areas. The rush to rezone and develop that land will only facilitate urban sprawl and lead to future necessary corrective actions financially borne by county residents. Inappropriate adjoining land uses will result in declining property values and have adverse impacts for existing county residents. Valley County should not let this happen.

The proposed changes are inadequate and should not be adopted. Before proceeding, sufficient coordination among county planning documents needs to be publicly vetted. Additionally, specific land use designations need to be thoughtfully aligned for the whole of Valley County.

Regards,

Bryan Donaldson 19 Thunderbolt Pl. McCall, ID 83638 From: Christine Thayer

Sent: Monday, November 24, 2025 11:10 AM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Subject: Comment on Draft Valley County Comprehensive Plan Amendments

Nov 23, 2025

Brent and Christine Thayer 7 Thunderbolt Pl McCall, ID 83638

Dear Commissioners,

Thank you for the opportunity to comment on the proposed amendments to the Valley County Comprehensive Plan. We are writing to express our strong opposition to the changes as currently drafted.

As community members, we believe the Comprehensive Plan should continue to reflect the principles that protect the character and long-term well-being of Valley County. The foundational values we rely on include:

- Protecting individual property rights and preserving property values
- Discouraging premature or poorly planned urban sprawl
- Minimizing adverse environmental and community impacts
- Maintaining open space and the rural character that makes this community unique

A blanket mixed-use land designation undermines these priorities. Sustainable growth should begin at city centers and extend outward in a thoughtful and coordinated manner, supported by adequate planning, services, and infrastructure. Development that occurs without proper preparation risks creating avoidable strain on public resources and negatively affecting the quality of life for existing residents.

We are also concerned that accelerating rezoning of former city impact areas is both unnecessary and potentially harmful. Experience has shown that the cost of correcting infrastructure deficiencies after development is significantly higher than planning and funding them responsibly from the outset. New development should carry its fair share of infrastructure expense. Shifting these costs onto current residents—often at many times the original cost—is neither equitable nor fiscally responsible.

We respectfully ask that the County take additional time to thoroughly evaluate the long-term implications of the proposed amendments and engage the community in deeper discussion. Thoughtful, deliberate planning will better serve current and future residents and help ensure that growth strengthens rather than erodes the values we share.

Thank you for your consideration and for your continued service to the community. Sincerely,

Christine and Brent Thayer

From:

Sent: Monday, November 24, 2025 3:12 PM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Subject: Opposition to Proposed 2025 Draft Comprehensive Plan

Dear Commissioners.

I am writing to express my strong opposition to the approval of the proposed 2025 Draft Comprehensive Plan and associated code changes. At the final public hearing, the P&Z Commissioners approved their own draft plan—yet the vote was not unanimous.

Voting *against* approving the document were Commissioner Ben Oya and Chair Ken Roberts, while Commissioners Ben Mabe, Carrie Potter, and Heidi Schneider voted *for* it. This division alone underscores the need for meaningful public review, and it is critical that community comments be taken seriously. The proposed 2025 Draft Comprehensive Plan cannot be said to reflect the Valley County community's long-term vision.

I oppose the draft plan for the following reasons:

1. Lack of implementation strategies

The draft outlines goals but provides no real strategies or priorities to achieve them. A plan without implementation steps is not a functional plan, and it is destined to fail.

2. Insufficient protection of open spaces and natural resources

As written, the plan will **not** protect Valley County's open spaces, timber, wildlife corridors, or agricultural lands—resources that define the county's character and economy.

3. Inadequate public outreach on Future Land Use Maps

The proposed Future Land Use Maps (pages 92–94) should be withdrawn until extensive outreach occurs. This process must include going out into communities—not relying solely on staff or on residents' ability to attend government meetings.

4. Failure to align with other long-range planning documents

Future Land Use designations should not be approved until they are fully cross-referenced with existing plans, such as the County Master Transportation Plan, Fire Protection Plan, Waterways Management Plan, the West Central Mountains Regional Housing Needs Assessment, and the BSU Resilience Assessment.

5. Poor guidance on smart, infrastructure-efficient growth

The draft does not adequately promote growth near existing infrastructure—an essential strategy for reducing long-term costs, wildfire risk, environmental impacts, and the fragmentation of open space and wildlife habitat.

6. Harmful changes to County Code §9-4-2 (Attachment A: Valley County Code §9-4-2)

Valley County Code \$9-4-2 explicitly directs the county to preserve open characteristics, scenic beauty, and agricultural lands and to evaluate other uses against agricultural compatibility. The October 2025 Draft Comprehensive Plan and associated ordinance changes introduce broad new land-use categories and maps while reframing the Plan to 'guide development' and without clear implementation steps or cross-references to fire, transportation, and water plans. This creates a direct tension with \$9-4-2 and increases LLUPA and legal risk. I urge the county to (1) retain and strengthen the preservation and compatibility language, (2) define or remove the 'Multiple Use' category, (3) require map changes to demonstrate consistency with all relevant facility and hazard plans, and (4) add measurable implementation steps and more robust public outreach before adopting the Draft.

The proposed code changes shift the purpose of the Comprehensive Plan from preserving "the open characteristics and scenic beauty of the county" to merely guiding development. This reframes the Plan as a development-enabling tool rather than a preservation-oriented blueprint. Referring to the Plan as "a general guide" further weakens its authority.

7. Reactive instead of proactive planning (Attachment B: Hazards of Reactive Planning)

Reactive planning is one of the greatest hazards facing Valley County. When land-use decisions are made one proposal at a time without strong guidance from a coherent plan, the result is inconsistency, incompatibility, and long-term harm. Reactive planning undermines community vision, creates unpredictable outcomes, and fuels conflicts between residential, commercial, and agricultural uses. It leads to scattered development far from existing infrastructure, driving up taxpayer costs, increasing wildfire risk, and degrading wildlife corridors, waterways, and open spaces. It also weakens the county's position under LLUPA by divorcing decisions from the Comprehensive Plan, and it erodes public trust by appearing to prioritize applicants over the public interest. Once our rural landscapes and scenic character are lost, they cannot be restored. This is why Valley County must adopt a forward-looking, strategy-driven plan—not continue down the path of case-by-case reactive decision-making.

8. Valley County Falls Short of LLUPA in Several Key Areas (Attachment C: Comparison of Valley County's Practices vs. LLUPA Standards)

Valley County's current practices reflect reactive decision-making, inadequate findings, insufficient public outreach, and inconsistent plan alignment—all of which place the County below LLUPA's expectations for transparent, evidence-driven, legally defensible planning. Strengthening the comprehensive plan, improving procedural consistency, and re-centering decisions on adopted policies are essential to restoring compliance and public trust.

Given that Valley County currently ranks below average under Idaho's Local Land Use Planning Act (LLUPA) metrics, we should be striving to become a model for sound and responsible planning—not lowering our standards.

9. Need for a full, professionally supported revision

The previous Comprehensive Plan has failed to meet many of its stated goals. The proposed plan does not provide a path A complete, professionally guided revision is needed, ideally through a multi-jurisdictional process with significantly more public participation.

Opposition to the "Multiple Use" Land Use Designation

is supposed to provide and erodes public trust.

At first glance, "Multiple Use" sounds flexible and reasonable. In reality, it is vague, open-ended, and potentially damaging to the rural character that makes Valley County special.

A "Multiple Use" category allows almost any activity—residential, agricultural, commercial, even industrial—without clear limits or predictable guidance. This is the opposite of good planning. Land-use designations are intended to provide stability, compatibility, and clear expectations. "Multiple Use" erases those boundaries, inviting incompatible uses, increased traffic and noise, habitat disruption, and environmental degradation in areas that should be protected. Valley County has long valued thoughtful, deliberate planning—not planning by exception. As proposed, "Multiple Use" hands future decision-makers a blank check to approve almost anything, anywhere, under the banner of flexibility. This undermines the predictability a Comprehensive Plan

I do not oppose growth. I oppose *uncontrolled* growth—growth without clarity, direction, or respect for long-term community values. Responsible development requires specific and intentional designations, not a catch-all category that means everything and nothing at the same time. Many of us choose to live in Valley County because of its open spaces, rural character, and sense of community. We must decide what we want our county to look like in 5, 50, or 100 years. Will Highway 55 become a corridor of nondescript commercial buildings, storage units, and viewblocking berms? Will our mountainsides be dominated by dense multi-unit housing? Or will we preserve the attributes that inspire people to live, work, and recreate here?

Commissioners are elected to represent the interests, needs, and values of the people who live in

the county—not developers, not lobbyists, not special interests, and not internal politics. They must find ways to work with **all** the people and not resort to behavior that belittles or insults those

with differing views. Commissioners must make decisions that benefit the community as a whole. Even when individual projects or applicants pressure the county, the overriding duty is to protect public safety, welfare, rural character, natural resources, and long-term community health. Commissioners should weigh not just what is popular today, but what will sustain the county's character, economy, environment, and infrastructure decades into the future.

Failure to plan is planning to fail.

Valley County deserves better than this incomplete and directionless draft. I urge you to reject the proposed plan and code revisions and commit to a more transparent, inclusive, and professionally guided process that truly reflects the community's long-term vision.

Thank you for your attention and for considering the concerns of a Valley County resident.

Sincerely,

Roger L. Bradshaw 3771 West Mountain Road, McCall

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Attachment A: Valley County Code §9-4-2

1) What §9-4-2 requires (short)

- 1. §9-4-2 states the comprehensive plan's purpose is to "preserve the open characteristics and scenic beauty of the county" and to "preserve agricultural land for farming" while allowing non-farm development only where it won't interfere with productive agriculture.
- 2. The section directs the county to: define agricultural/compatible uses, use those as the compatibility benchmark, protect agricultural areas from non-compatible encroachment, allow agricultural uses without unnecessary regulation, and promote improvement/expansion of permitted uses.

2) What the 2025 draft(s) and related documents are doing that matters

- The county web site currently posts the Draft Comprehensive Plan (Oct 2025) and a
 "Changes to Comprehensive Plan (10.16.2025)" summary, plus draft ordinance language
 and staff reports associated with the October/November hearings. These are the official
 materials implementing the update.
- 2. Local reporting and staff materials show the update introduces: countywide future growth/land-use maps, new land-use categories (including "Multiple Use"), revised shoreline/driveway/fire access standards, and ordinance repeals or re-frames for some prior McCall-Impact Area rules. The Planning & Zoning vote on the draft was split, signaling substantive disagreement about the direction of the revisions.

3) How §9-4-2 and the draft interact — key tensions

- 1. Preservation vs. Development-first wording
 - §9-4-2 privileges preservation and agricultural protection. The draft Plan and proposed code edits (as discussed in staff materials and local coverage) shift language toward "guiding development," and the introduction of broad categories like "Multiple Use" risks diluting the preservation emphasis. That is a direct policy tension: one document says protect and favor agricultural compatibility; the draft Plan's framing could be read as prioritizing development flexibility. This undermines the value judgement embedded in §9-4-2.
- 2. Maps and categories introduced without procedural safeguards
 - §9-4-2 expects protection of agricultural areas and compatibility tests. The proposed Future Land Use Maps (and a "Multiple Use" category) appear to be

introduced as countywide designations. If those maps are adopted without clear, objective compatibility criteria and without cross-referencing to fire, transportation, water, and other facility plans, \$9-4-2's protection mandate will be difficult to implement in practice—because "compatibility" becomes subjective.

3. Implementation gap

99-4-2 anticipates standards/procedures that protect compatible uses and
"encourage expansion and improvement" of permitted uses. The Draft Comp Plan
(per county postings and staff reports) lacks concrete implementation steps,
sequencing, funding, or prioritized strategies. Without implementation language
and ordinance alignment that operationalize §9-4-2, the preservation goals become
aspirational only. That increases legal risk because LLUPA requires that land-use
decisions be tied to the plan and implemented through code.

4. Cross-referencing and multi-plan alignment

S9-4-2 implies the comprehensive plan will be used to protect agriculture and guide compatible uses; it therefore should be implemented via coordinated planning (transportation, fire protection, water, housing, resilience). The Draft's map and category changes must be cross-checked against those other plans. Evidence from county materials and reporting shows those cross-references are not robustly integrated into the Draft (or at least not publicized), which invites conflicting decisions and implementation gaps.

5. Public outreach and legitimacy

§9-4-2's protections rely on transparent standards in code and plan. Local coverage
and the County's hearing materials show contentious debate and a split P&Z vote.
Approving broad map changes and new categories without targeted, on-the-ground
outreach (beyond public meetings) would weaken the legitimacy and make it harder
to show decisions reflect community policy—important for LLUPA defensibility.

4) Practical legal / planning consequences

- LLUPA risk: If decisions under the revised plan are not clearly tied to explicit policies, objective criteria, and findings grounded in the plan (and if the plan language is internally inconsistent), the county faces higher appeal/reversal risk in LLUPA cases. §9-4-2's preservation language is a legal lever — but only if the plan and code are aligned and implemented.
- 2. Implementation drift: Broad categories like "Multiple Use" invite case-by-case discretion and can produce the reactive planning hazards you've already highlighted (inconsistent approvals, infrastructure strain, habitat fragmentation). That outcome contradicts §9-4-2's intent to protect agricultural/open areas.

5) Recommended changes / how to reconcile the draft with \$9-4-2

- Retain and strengthen preservation language keep §9-4-2's preservation purpose front and center in the Comprehensive Plan's policy chapter and preface the Future Land Use Map with an explicit statement: where preservation is required, agricultural/open-space protection prevails. (This avoids a "development first" reading.)
- Define "Multiple Use" rigorously or remove it if the county keeps "Multiple Use," require
 a strict definition with permitted uses, prohibited uses, thresholds, and required findings
 demonstrating compatibility with agricultural/ environmental values before an approval can
 proceed. Otherwise, delete it.
- 3. Add cross-reference requirements require any Future Land Use Map change to demonstrate consistency with the County Master Transportation Plan, Fire Protection Plan, Waterways/Watershed plans, regional housing needs assessments, and resilience assessments (explicit list). Make map adoption conditional on these cross-checks.
- 4. Add measurable implementation actions and timelines include prioritized strategy statements, responsible parties, budgets or funding sources, and metrics so the plan is

- actionable and so \$9-4-2's goals are implementable. This is critical to meet LLUPA's expectation that decisions be grounded in the plan.
- 5. Strengthen findings requirements require all land-use approvals to include detailed findings explicitly tying the decision back to (a) §9-4-2 policy, (b) the Comp Plan policies and FLUM designation criteria, and (c) cross-reference to service capacity (roads, fire, water). This reduces appeal risk.
- 6. Expand outreach require outreach that goes beyond hearings: neighborhood mailings, mailed surveys, pop-up events, and workshops in affected communities so the county can show meaningful public input before adopting maps or new categories.

Attachment B: Hazards of Reactive Planning

Reactive planning—making land-use decisions one proposal at a time rather than following a long-term, coherent strategy—is widely recognized as one of the most damaging approaches to growth management. It creates instability, inconsistency, and long-term harm to communities.

1. Loss of Community Vision and Identity

Without a clear plan, decisions drift toward the path of least resistance. Over time, this erodes the rural character, open space, and scenic qualities that residents value. The community becomes shaped by whoever shows up with the next application, rather than by the people who live there.

2. Inconsistent, Unpredictable Decisions

Case-by-case approvals produce inconsistent outcomes. Citizens, landowners, and developers cannot predict what will be allowed next—which fuels conflict, distrust, and legal disputes. The county appears arbitrary, not principled.

3. Increased Conflicts Between Land Uses

Reactive planning fails to ensure compatibility between new and existing uses. This leads to:

- noise conflicts
- traffic congestion
- dust, odor, lighting, and visual impacts
- wildlife and habitat disruption
- decreased safety
- degraded quality of life

People end up living next to things that never should have been allowed side-by-side.

4. Infrastructure That Falls Behind Development

Growth happens where infrastructure **doesn't** exist—because no plan guides it to where it *should* go. The county then must retroactively fix:

- unsafe roads
- inadequate fire protection
- · insufficient water or sewer capacity
- failing drainage systems
- emergency response delays

These retrofits cost taxpayers far more than planning smartly in the first place.

5. Higher Long-Term Costs for Residents

When development is scattered, the county must extend services—roads, plowing, fire, law enforcement—over much larger areas. This increases taxes and strains budgets. Reactive planning prioritizes short-term approvals over long-term fiscal health.

6. Environmental Degradation

Case-by-case development fragments:

- wildlife travel corridors
- riparian zones
- open space

forest resilience

It also increases wildfire risks, water quality impacts, erosion, and habitat loss. Once fragmented, these resources cannot easily be restored.

7. Weak Legal Position Under LLUPA

Idaho's Local Land Use Planning Act (LLUPA) requires decisions to be tied to a comprehensive plan. Reactive planning creates a pattern of decisions **not grounded** in the plan—making the county more vulnerable to legal challenge and appeals.

8. Increased Pressure from Developers

Without a strong, clear plan, the county becomes vulnerable to:

- aggressive developer proposals
- lobbying
- · applications inconsistent with community values
- "planning by variance"
 The loudest or best-connected applicant gets the approval—not necessarily the project that serves the public interest.

9. Erosion of Public Trust

When residents see approvals happening without clear guiding principles, trust breaks down. Citizens feel unheard and unprotected. Transparency suffers, and the county appears to be drifting toward approval-by-default.

10. Permanent Loss of What Makes the County Special

Once scenic views, wildlife corridors, agricultural soils, and rural landscapes are gone, they do not return. Reactive planning trades long-term community well-being for short-term convenience.

Attachment C: Comparison of Valley County's Practices vs. LLUPA Standards

1. LLUPA Requires: Decisions Must Be Consistent with the Comprehensive Plan LLUPA Standard: Land-use approvals must clearly align with adopted plan goals, policies, and future land-use maps.

Valley County Practice: Valley County frequently approves applications—even large or high-impact ones—that conflict with the existing comprehensive plan or the intended land-use designation. These decisions often rely on exceptions or special approvals, resulting in case-by-case planning, not plan-driven planning.

Result: Weak legal footing, increased appeals risk, and erosion of public confidence.

2. LLUPA Requires: Strong, Specific Findings of Fact

LLUPA Standard: Every decision must include written findings showing:

- evidence on the record,
- · compliance with ordinances, and
- consistency with the comp plan.

Valley County Practice: Findings of fact are often minimal, generalized, or restatements of applicant claims rather than independent analysis. In some cases, findings do not adequately explain how the decision meets comp plan goals such as protecting agriculture, scenic character, or wildfire resilience.

Result: Risk of decisions being overturned in court for insufficient justification.

3. LLUPA Requires: Transparent, Accessible Public Process

LLUPA Standard: Counties must provide meaningful opportunities for public participation. Valley County Practice: Public involvement often occurs late in the decision cycle, and major map changes—such as the "Multiple Use" designations—were introduced with limited direct

outreach. Community members are expected to discover changes and attend meetings rather than the County proactively engaging them.

Result: Lower public trust and vulnerability to claims of inadequate notice or participation.

4. LLUPA Requires: Ordinances Must Implement the Comprehensive Plan

LLUPA Standard: Zoning must flow logically from the plan.

Valley County Practice: The County often updates ordinances independently of the plan, or approves developments inconsistent with zoning intent, creating gaps between the comp plan and the zoning code. The proposed changes to County Code 9-4-2 shift the purpose away from resource protection—creating further misalignment.

Result: Ordinance drift that weakens defensibility and predictability.

5. LLUPA Requires: Decisions Should Be Predictable, Consistent, and Non-Arbitrary LLUPA Standard: Similar applications should receive similar treatment unless substantial differences justify otherwise.

Valley County Practice: Decision patterns show inconsistency, with some projects approved despite infrastructure limits, wildfire risk, or environmental constraints—while other similar proposals have been denied. Outcomes often depend more on applicants than on objective criteria.

Result: Perception of favoritism and reduced fairness.

6. LLUPA Encourages: Forward-Looking, Proactive Planning

LLUPA Standard: Comprehensive plans are meant to guide growth strategically and prevent conflicts.

Valley County Practice: Valley County relies heavily on reactive, applicant-driven approvals rather than long-term strategy. The new draft comprehensive plan itself lacks implementation steps, measurable strategies, or priority sequencing—making it difficult to meet LLUPA's intent.

Result: Planning by exception rather than planning by policy.

7. LLUPA Requires: Consideration of Public Facilities, Services, and Hazards LLUPA Standard: Growth should be evaluated in relation to fire protection, transportation, water resources, hazards, and emergency services.

Valley County Practice: Approvals often occur in areas with:

- limited fire access
- substandard roads
- high wildfire risk
- inadequate emergency response
- sensitive riparian or wildlife corridors

These constraints are often acknowledged but not meaningfully mitigated before approval. Result: Increased long-term costs, higher wildfire exposure, and environmental impacts.

The city of McCall and the citizens of Valley County have done the work. They have reviewed your proposals and voiced their concerns. Valley County has not informed the city or the citizens of Valley County on its policies or plans. The County has not done the work, so what are you specifically asking us to comment on?

The data and the studies are there, and they show that a lack of planning will:

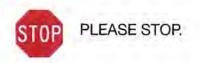
- 1. Increase the costs of homeowners insurance. More housing, and especially that which has a lack of experienced planning, will increase rates.
- 2. Taxes will increase as infrastructure in the county is expensive and doesn't pay for itself. You will be creating a second city that engulfs McCall and city residents will be hit especially hard as they pay for both "towns". This is especially true if you are depending upon a recreational economy that is prone to difficulty in economic uncertainty.
- 3. The lack of experienced planning will damage water sheds and lead to contamination of McCall's water sources and sources that the local agricultural economy depends upon.
- 4. Open trails will close as a lack of planning will increase unwanted foot traffic onto private property.
- 5. Biodiversity of the wildlife and environment will diminish, destroying the very reason people want to live in McCall.
- 6. You talk of affordable housing, but don't have a plan on how to get there. If it's that great share it.

There is no planning in "multiple use". All it says is "the doors are open". This is why most local governments take several years to work with their citizens on comprehensive plans. Without transparency you also open the doors to cronyism and pay to play politics while making it difficult for the people who live here to plan for their future.

On top of that, each of you have business interests in development. What are your rules relating to personal gain because of one of your decisions? There is a big boundary here: public officials may not participate in governmental decisions affecting their economic interests. How will you avoid being in the position of choosing between advancing the public's interests and your own financial interests?

The city and the public deserve answers. Do the work. Create the plans and policy. Tell us how you will protect the public trust. Engage in a dialog with the city and give us, your citizens, answers. This is true leadership.

Respectfully, Kris Crookham





Commissioner Maupin, you and Cynda Herrick serve on the WCM Economic Council who just hosted a speaker from Pocatello on how to collaboratively update a Comprehensive Land Use Plan.

Why is Valley County not doing something similar?

We have not reached out to Valley County residents; no education, no public input and ideas sought. The legal notice in the paper about the meetings is not adequate for seeking public input.

The Comprehensive Land Use Plan is the guiding document for zoning decisions (see citations below). It is where vision meets land. Yet there hasn't been a single public education or outreach session on it.

PLEASE.....consider one of the following motions:

- Refer this item back to the P&Z so they can coordinate public education and citizen input workshops to consider and advance a Comp Plan that contains the vision of its residents, OR
- If you're facing a deadline to approve this amendment to cover the AOI areas before year's end, DELETE the majorly impactful future land use designation map on pages 92-94.

I'm hopeful the County can work towards a Comprehensive Plan amendment process which invites and gathers public input for a revised plan for which we can all be a participant.

Thank you for your consideration,

Michelle Rentzsch 51 Trabert Ln, McCall

Idaho Compiled State Statutes LAND USE

67-6511. ZONING ORDINANCE. (1) Each governing board shall, by ordinance adopted, amended, or repealed in accordance with the notice and hearing procedures provided under section 67-6509, Idaho Code, establish within its jurisdiction one (1) or more zones or zoning districts where appropriate. The zoning districts shall be in accordance with the policies set forth in the adopted comprehensive plan.

67-6511(b) After considering the comprehensive plan and other evidence gathered through the public hearing process, the zoning or planning and zoning commission may recommend and the governing board may adopt or reject an ordinance amendment pursuant to the notice and hearing procedures provided in section 67-6509, Idaho Code....

November 21, 2025

Chairman Maupin, Commissioners Thompson and Caldwell,

Thank you for the opportunity to comment on the update to the Valley County Comprehensive Plan. This is a very important county document and therefore deserves thorough review and a high degree of public input.

We understand the need for the updates to the Comp Plan regarding the legislatively required changes to the McCall Area of Impact. We also support the increases in water quality protections included in the update.

We ask for Pages 92, 93, and 94 to be removed from the Comprehensive Plan before approval. The draft "Future Land Use Maps" should not be approved for the following reasons:

- Much greater public engagement and input is needed before maps such as these guide county land use and development.
- Input should be obtained from the wildfire risk working group and the agriculture protection advisory board.
- County planning documents such as the Master Transportation Plan should be considered to foster a safer, more efficient and fiscally responsible roads system when creating this type of map.
- The broadly covered shading in some areas shows state and other public lands or lands outside the county as highlighted for residential development.
- Official county documents should be accurate. These maps are too broadly shaded.
- Agricultural landowners in many cases have their land shaded to direct future residential land use growth. This puts a target on their properties and will make it harder for them to keep their lands in open agriculture, conflicting Comp Plan goals.
- Agriculture is an important part of Valley County's economy and ensures open spaces which are valued by all.
- The residential long range growth type depicted on the current maps does not take into account riparian waterways and preserving water quality. In fact, in many cases it guides residential growth into these fragile ecosystems.
- The maps do not consider or provide for wildlife travel or migration corridors. This will harm our wildlife resources which support the recreation economy, and it will create greater human/wildlife conflicts and agricultural/wildlife conflicts.

We understand County staff have spent time and effort on these maps. We watched the P&Z work session. Perhaps these maps are a starting place, but they clearly are not ready

for approval as part of the Comprehensive Plan. The Comprehensive Plan update did not have full support of the Planning and Zoning Commission, we believe in a large part due to these maps.

I attended the recent West Central Mountains Economic Summit and am hopeful that the collaboration with the Boise State University Resilience Institute will lead to improvements in county planning and wise growth. The presentation from the Pocatello city planner was especially good. In his example he highlighted how the city took over a year to seek public input by going out into the community at such events as farmer's markets and other locations like outside grocery stores. They conducted surveys and used a wide variety of techniques to gather information. It was through this lengthy process planners learned of the important values and needs of the community. I urge you, as Valley County commissioners, to follow a similar path and utilize all the tools available for the best possible long-range planning. Do not rush through this comprehensive plan update. Please remove pages 92, 93, and 94 from the draft Comprehensive Plan.

We are also concerned and oppose the revisions to County Code "9-4-2: Policy". The proposed draft changes the purpose of the Comprehensive Plan from preserving "the open characteristics and scenic beauty of the county" to "the purpose of the plan and analysis is to guide development...". These changes emphasize future development over the current Plan's objectives to "preserve agricultural land for farming and allow nonfarm development in rural areas only when it does not interfere with ... agriculture". We recognize and support growth near infrastructure, but we have also witnessed examples where the approved land uses by agricultural landowners are impacted by conditional land uses of another. We do not believe the changes to County Code 9-4-2 have been thoroughly explained or vetted by public input. We ask you not to approve changes to 9-4-2 until greater review and public input is received.

Thank you for your consideration on these important issues.

Sincerely,

Marshall Haynes and Peggy McMillen
13607 Farm to Market Road.

Additional Comments Received by 4:30 p.m., October 21, 2025

- 1. Laurence Huie, S.Samson Trail, October 16, 2025
- 2. Laura Shealy, 3710 Warren Wagon Road, October 17, 2025
- 3. Alan Shealy, 3710 Warren Wagon Road, October 19, 2025
- 4. George Raino, October 20, 2025
- 5. Eric Young, October 21, 2025
 - 6. William and Marcia Mulder, October 21, 2025
 - 7. Linda Johnson Williams, 3710 Warren Wagon Road, October 20, 2025
 - 8. Dr. Vicki L. Miller, October 21, 2025



October 16,2025

Valley County Planning and Zoning Commission 219 N. Main Street Cascade, Idaho 83611



RE: Valley County Comprehensive Plan and Code Update — for Public Hearing October 23, 2025

Dear P&Z Commissioners,

I know this is last minute but just realized the upcoming meeting and just wanting to throw my thoughts - in advance forgive me if i may not be as informed—As i understand that the county is not only decimating the impact zone in most counties i get it but to make the whole county zoned as multiple use is to ignore the jointly agreed upon plan with the city of mc call 2018.

You have to admit that the draw for valley county is the recreation amenities and rural openness that makes economic sense to preserve. I would challenge you to not just lump the various communities that make up valley county as they have their own unique draws for visitor and residents and should be treated as such rather than lumping them all as one — McCall is probably the biggest draw and destination resort town in the valley that contributes the most economically to this valley...Through the effects of having an impact zone in place to protect that vision. By shrinking the impact zone you are in affect voiding this vision Yet by placing a blanket multiple use zone code universal to the future vision of the valley would in my opinion lead to uncontrollable development which would threaten residential zones and in general the community character that you were elected to protect. You have already proven that your lack of respect to the Payette river scenic byway in allowing metal buildings to litter the corridor. Allowing the passage of an only

commercial storage unit to be placed along South Samson Trail shows your lack of protecting residential zones.

I would hope that you consider this change before someone in the future decides it would be a great idea to put in a theme park / water park in your neighborhood. So reconsider or revisit the 2018 Comprehensive Plan.

Sincerely,

Laurence Huie South Samson Trl- in current impact zone October 17, 2025

To: Valley County Commissioners

Re: New AOI boundaries and Development Requirements for Water Quality

Dear Commissioners,

My family have been property owners on Payette Lake for nearing one hundred years. We fully support the Valley Soil and Water Conservation District's recommendations for development codes in the previously held AOI by the city of McCall. We support new zoning codes added (*not a blanket multi-use or mixed use*) for properties around Payette Lake that reflect the sensitive environment for water quality considerations. We support the city of McCall zoning for near shore environs.

Here are the suggestions that we feel are essential for maintaining and even improving the Water Quality of Payette Lake:

- 1) Establish a 300-foot county-wide standard Waterways Shore Zone.
- 2) Adopt the Shore Zone ordinance provided in 2025.
- 3) Implement and follow guidelines in the 2022 Valley County Waterways Management Plan.
- 4) Adopt the "Basis of Design" standard to ensure proper stormwater safeguards are installed and maintained.
- 5) Incorporate Valley Co. Comprehensive Plan Goals and Objectives, with VSWCD recommendations, into development approvals and building permit conditions.

We appreciate the hard work this entails. These are essential protections that need to be in place before development. We support your devotion to preserving our beautiful county and water quality.

Sincerely,

Laura Shealy 3710 Warren Wagon Road McCall, ID To: Valley County Commissioners

Re: New AOI boundaries and Development Requirements for Water Quality (via email)

Dear Commissioners,

My wife's family has owned property on Payette Lake for nearly a century, and we care deeply about preserving its natural beauty and water quality. We strongly support the Valley Soil and Water Conservation District's recommendations regarding development codes for the area formerly designated as the Area of Impact (AOI) by the City of McCall.

We believe new zoning regulations should be carefully tailored to reflect the environmental sensitivity of the land surrounding Payette Lake—particularly with regard to protecting water quality. A broad "multi-use" or "mixed-use" zoning approach is not appropriate for such a critical area. Instead, we support the city of McCall's zoning for near-shore environments and encourage the county to adopt similar standards.

To that end, we respectfully urge the Commission to consider the following key actions:

- 1. Establish a minimum 300-foot county-wide Waterways Shore Zone standard.
- 2. Adopt the 2025 Shore Zone Ordinance as proposed.
- 3. Implement and adhere to the guidelines outlined in the 2022 Valley County Waterways Management Plan.
- 4. Require the use of a "Basis of Design" standard to ensure that effective stormwater protections are both installed and maintained.
- 5. Integrate the goals and objectives of the Valley County Comprehensive Plan, along with the recommendations from the VSWCD, into development approvals and building permit conditions.

We appreciate the effort and thoughtfulness that go into making these important decisions. These protections are essential to ensure responsible development and to preserve the high water quality of Payette Lake for future generations. Maintaining water quality in Payette Lake is critical to preserving Valley County's economic vitality.

Thank you for your dedication to protecting the natural resources of our county.

Sincerely,

Alan Shealy 3710 Warren Wagon Road McCall, ID From: george raino

Sent: Monday, October 20, 2025 3:15 PM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Subject: Revisions to valley county comprehensive plan

Dear Ms. Herrick,

My wife and I hold property in the former McCall area of impact, a single family residence since 1985. We are dismayed that multiple use is proposed for our area, against all former regulations. We are opposed to any changes to the established land use be considered or adopted. Any changes would damage the care and use we put into our property.

I am George Raino, email	phone:	Thank you for your
consideration.		

From: Eric Young

Sent: Tuesday, October 21, 2025 8:42 AM **To:** Lori Hunter < lhunter@valleycountyid.gov>

Cc: Cynda Herrick <cherrick@valleycountyid.gov>; Eric Young

Subject: VC P&Z Comprehensive Plan Multi Use Zoning Comment

Lori -

I apologize, but I failed to include a comment on the Multi-use rezone in my origonal comment letter. Please include the following in the report files.

-Sincerely, Eric Young

Dear VC P&Z Commissioners -

I am against the rezoning of any additional lands in Valley County to "Multi-use".

Additionally, I would like the Valley County Comp Plan to be updated with a **high priority goal** to implement Valley County wide zoning districts for the following reasons:

- "Multi-Use" zoning reduces land development predictability
- Only two counties in Idaho use "Mulit-use" zoning
- At a recent VC public hearings, a VC commissioner indicated support to move Valley County to a zoning district system.

Ideally, this goal would be completed in the next two years.

Thank you very much for considering this update the Comp Plan.

Sincerely, Eric Young October 21, 2025

Valley County Planning and Zoning Commission c/o Cynda Herrick, AICP, CFM Planning and Zoning Director P.O. Box 1350 Cascade, ID 83611 cherrick@valleycountyid.gov

Honorable Commissioners:

We write to you regarding the proposed changes to the Valley County Code, specifically those related to the "Fire Code" in Paragraph 3 and subparagraphs 3a.-3e. We urge you NOT to adopt this change, and suggest instead that the Code require that applicants meet with fire department personnel to informally review applications.

Our decades-old driveway in Valley County is about 250 in length, on a lot of record established by the State of Idaho. Even with significant tree removal, utility relocation, rock blasting and extensive site grading it's unlikely our driveway could be configured to meet the "turnaround" requirements in 3c. We, our guests, and delivery and service vehicles have no difficulty driving in, backing in or turning around. If we can back a full-sized SUV with a large boat trailer in, firefighters can surely maneuver their shorter and un-articulated vehicles safely. Yet under this Code change we would likely <u>not</u> be able to obtain a permit to modify or rebuild our home.

It does not seem reasonable to have the same turnaround requirements for a private driveway as those required for an access roadway.

And, although the provisions of Paragraph 3 might make things *convenient* for firefighters, they do not (and cannot) *assure* safety. What they will assure is that Valley County residents will be forced to install unnecessary, costly and environmentally detrimental turnarounds. Asking that applicants meet with <u>fire department personnel</u> (NOT "fire code officials") to constructively review and make informal recommendations to applications is a win-win situation

for emergency personnel and the safety of Valley County residents.

Thank you for your consideration.

Respectfully,

William and Marcia Mulder 6700 E. Glacier Dr. Boise, ID 83716 From: linda williams

Sent: Monday, October 20, 2025 3:16 PM

To: Cynda Herrick <cherrick@valleycountyid.gov>

Subject:

October 17, 2025

To: Valley County Commissioners

Re: New AOI boundaries and Development Requirements for Water Quality

Dear Commissioners.

My family have been property owners on Payette Lake for nearing one hundred years. We fully support the Valley Soil and Water Conservation District's recommendations for development codes in the previously held AOI by the city of McCall. We support new zoning codes added (not a blanket multi-use or mixed use) for properties around Payette Lake that reflect the sensitive environment for water quality considerations. We support the city of McCall zoning for near shore environs.

Here are the suggestions that we feel are essential for maintaining and even improving the Water Quality of Payette Lake:

- 1) Establish a 300-foot county-wide standard Waterways Shore Zone.
- 2) Adopt the Shore Zone ordinance provided in 2025.
- 3) Implement and follow guidelines in the 2022 Valley County Waterways Management Plan.
- 4) Adopt the "Basis of Design" standard to ensure proper stormwater safeguards are installed and maintained.
- 5) Incorporate Valley Co. Comprehensive Plan Goals and Objectives, with VSWCD recommendations, into development approvals and building permit conditions.

We appreciate the hard work this entails. These are essential protections that need to be in place before development. We support your devotion to preserving our beautiful county and water quality.

Sincerely,
Linda Johnson Williams
3710 Warren Wagon Rd

October 21, 2025

Dear Valley County Planning & Zoning Commissioners:

I just learned about the proposed changes to the Valley County Comp Plan and County Ordinances that the P&Z Commission will be considering on October 23.

I object to proposed changes that would move away from the County's longstanding protections of productive farmland to elements that favor residential development (the greatest consumer of productive farmland in Valley County and elsewhere). I haven't seen these proposals publicized in the agricultural community, and I think the County would be better served by taking additional time and effort to seek producer input before considering elements that could fundamentally affect ag land policy. Ag lands are important in their own right, but they also underpin important components of the County's tourism and outdoor recreation economy.

I'm concerned about the implications of proposed changes for agricultural land in Valley County in general, and our family's land in particular. The Miller family is a longstanding owner of 320 acres west of Farm to Market that straddle Spink Lane. Our irrigated pastureland is productive, supporting 200-plus head of cattle each year. Our land also supports the County's objectives for rural character, open space, and wildlife.

In approving the River Fork Ranch subdivision neighboring our property earlier this year, the County Commission dismissed our concerns about development impacts, finding they would be limited because it was only a 30-house subdivision and the developer said no future phases were planned. However, less than a year later, the County is now proposing new future land use maps with "Long-Range Growth Types," indicating the County wants to direct residential development from McCall down to Spink Lane, between Highway 55 and Farm to Market. This area includes hundreds of undeveloped acres, including not only land owned by the River Fork Ranch developer, but also lands owned by our family. The maps illustrate build-in impediments to wildlife movements between the east and west side of the Valley and indicate residential development along the entire Lake Fork Creek corridor.

If the P&Z Commission is going to recommend changes to the land use maps for long-term growth, I ask for removal of the area north of Spink Lane from residential long-range growth. This supports a connection of our agricultural and other open space lands across both sides of Highway 55, both for ag land productivity and economics, but also because of wildlife movements. Without better consideration for wildlife movement, elk and deer are more likely to cause damage to ag lands that remain only as pocket parcels.

Proposed plan revisions incorporate references to protection of agricultural lands by promoting inclusion in Agricultural Protection Areas and conservation easements, and "promoting development near existing infrastructure." The APA and conservation easements have some

benefit, but I ask that the plan include a more meaningful counterpart objective of *discouraging* residential development that is distant from city infrastructure and services. The more remote locations are more likely to impact ag lands because of increased traffic and greater presence of people who aren't considerate of agricultural needs. Leapfrog developments typically demand infrastructure come to them. Without companion incentives and disincentives, one can expect to continue the leapfrog pattern of development with approval of the River Fork and other subdivisions in the middle of ag lands. Our family also owns land near Star in Ada County, and we have seen rapid conversion of ag lands to residential subdivisions, strip malls, and so forth. Assuming it's important to Valley County to preserve rural character, it needs to do more for ag land protection and put weight beyond vague planning aspirations.

Instead, the proposed ordinance changes seem to be leading even farther away from the stated objectives of keeping ag land viable.

In addition to objecting to the land use maps, I also object to proposed changes to Ordinance 9-4-2 (Permitted Use Policy) that would add residential uses to permitted ag land uses and would delete references to preserving ag land for farming and restricting nonfarm development.

During the River Fork Ranch permitting process, I asked the County to look at Idaho Farm Bureau Cost of Community Service Studies, which show residential developments generally cost more in services than they bring in revenue – there's a net loss when residential subdivisions replace productive farmland without an economic base. The County Comp Plan revisions indicate the County still doesn't have sound data or fiscal policy for revenues from residential development in comparison to the costs of services.

In addition to my agricultural experience in livestock production, I worked for Idaho's State Emergency Response agency and have a Ph.D. in Emergency Management. I was also an adjunct professor at Colorado State University, Purdue University and I have experience with plan development and implementation. If P&Z wants to have meaningful comments and transparency on plan revisions, it should better identify changes to the plans and provide more effective notice to the public. Proposed comp plan changes for land use maps and ordinances with implications for residential development and agriculture should head in a direction more supportive of range and crop productivity, rural character and open space. I ask the Commission to take a pause on these aspects of plan revisions and regroup after more meaningful opportunity for discussion by the affected community.

Respectfully,

Dr. Vicki L. Miller

Re: Comp plan

From Mark Butler

Date Thu 10/23/2025 8:34 AM

To Cynda Herrick <cherrick@valleycountyid.gov>

Cc Lori Clemens < lclemens@cityofdonnelly.org>

2 attachments (2 MB)

Future Land Use Map with COUNTY propsoed impact line.pdf; Street Classification.pdf;



CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Your suggested language is very good.

Immediately after the following on page 95 we could state "each city's future land use maps should be considered when making decisions."

[Beginning in 2026, all three impact areas will be administered by Valley County and governed by the Valley County
Comprehensive Plan and Valley County Ordinances.]

I can recommend an objective under Goal 1 in Transportation on page 44, as follows: "Consider each communities adopted Master Transportation Plans."

Here are the maps. I do not plan on attending unless you think I should come. THANK YOU!!!

On Thu, Oct 23, 2025 at 8:27 AM Cynda Herrick < cherrick@valleycountyid.gov wrote: Hello,

That was the discussion ... along with a requirement to get approval from Donnelly for anything adjacent to the city limits.

We put in the Comp Plan references to Master Transportation Plans so they can be considered when making decisions. I don't think we want to print them in the plan, because they are subject to change. (We do not even put in Valley County's...)

The same for your future land use maps, they can be considered. But, I don't think we want to amend our plan everytime you amend your plan.

Please send me the maps and I can ask the P&Z Commission what they think.

Immediately after the following on page 95 we could state "each city's future land use maps should be considered when making decisions."

[Beginning in 2026, all three impact areas will be administered by Valley County and governed by the Valley County
Comprehensive Plan and Valley County Ordinances.]

I can recommend an objective under Goal 1 in Transportation on page 44, as follows: "Consider each communities adopted Master Transportation Plans."

Thanks, Cynda

Cynda Herrick, AICP, CFM
Valley County
Planning and Zoning Director
Floodplain Coordinator
PO Box 1350
Cascade, ID 83611
(208)382-7116

"Live simply, love generously, care deeply, speak kindly, and leave the rest...."

Service Transparent Accountable Responsive

From: Mark Butler

Sent: Wednesday, October 22, 2025 3:28 PM

To: Cynda Herrick < cherrick@valleycountyid.gov

Cc: Lori Clemens < clemens@cityofdonnelly.org

Subject: Comp plan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Cynda,

Lori sent me the comp plan info a couple days ago. Why does it not include Donnelly's land use map and transportation map as they had agreed?

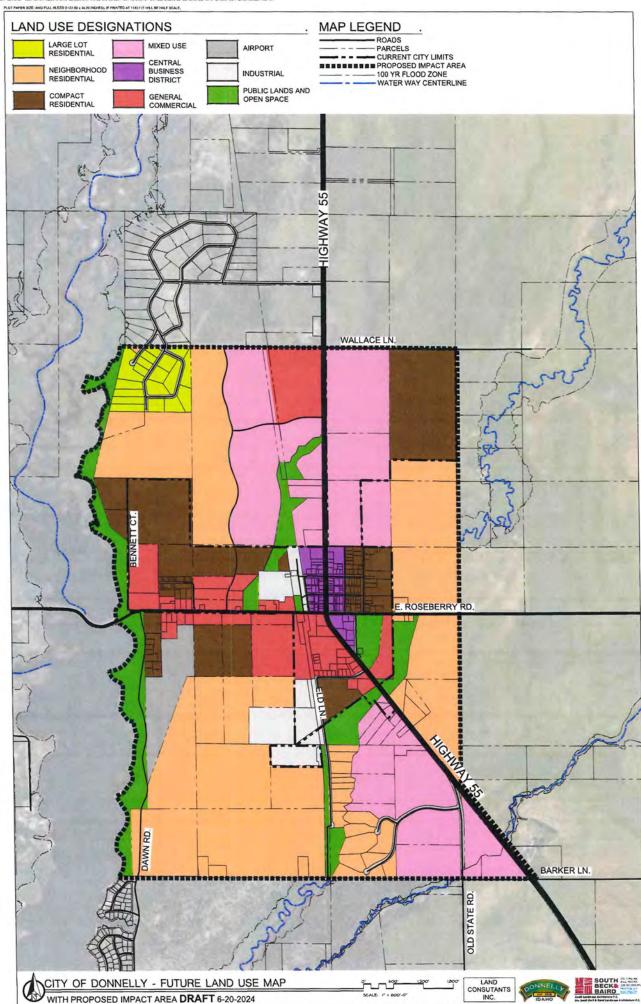
Mark L. Butler Author of Freedom Now Order here: https://amzn.to/2A91Mqv

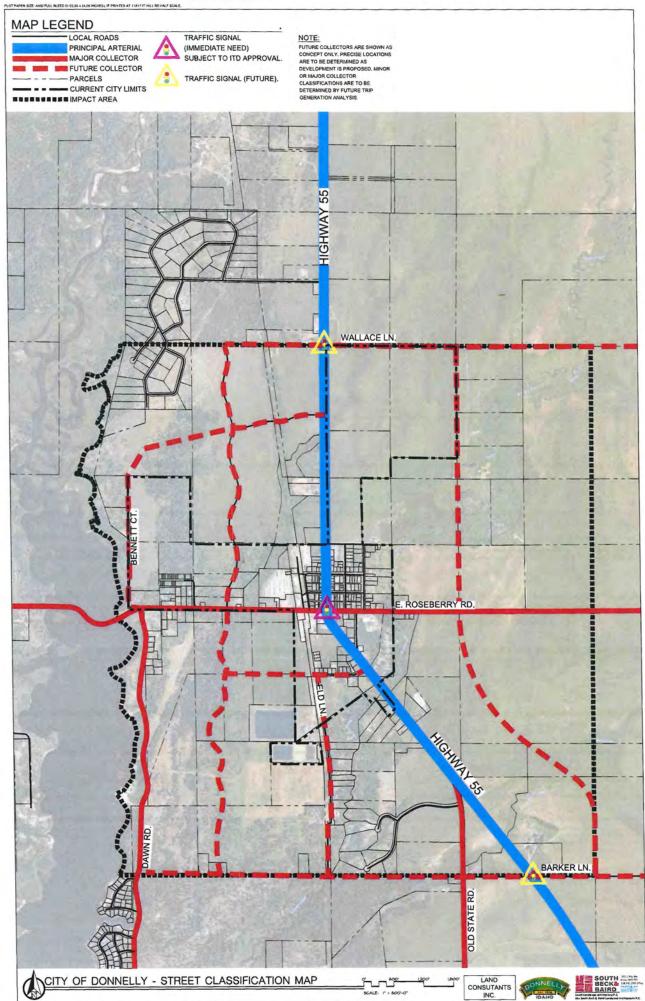
BRAVEHEART--THE GREATEST OF ALL RISK THEIR LIVES FOR FREEDOM!!!

Mark L. Butler Author of Freedom Now Order here:

https://amzn.to/2A91Mqv

BRAVEHEART--THE GREATEST OF ALL RISK THEIR LIVES FOR FREEDOM!!!





Dear Commissioners: below is a summary of testimony from the County Commissioner meeting held in McCall on September 3, 2025. This testimony was opposed to the changes to McCall's area of impact. Please note, there was no testimony to support the changes at this meeting. There was also the previous meeting in July and if you wish, I can create a list of items from this hearing as well. I request Valley County Planning and Zoning address the concerns of the citizens before moving forward. Good leadership demands that the public be involved, and the county be clear and transparent with their plans for the area of impact so that citizens of Valley County can plan for their future.

Sincerely.

Kris Crookham October 22, 2025
1957 E Mortimer Dr Greenwood Dr

Boise ID

m.

1. Lack of Transparency and Public Engagement

McCall, Idaho

- The ordinance was advanced without adequate public outreach or explanation of its rationale, goals, or long-term implications.
- · Residents expressed confusion over the process, timeline, and the meaning of zoning map changes with no clear answers provided.
- The Board failed to articulate the reasoning behind the shift in boundary policy or the repeal of existing AOI ordinances.

2. Zoning Changes and Oversight Concerns

- •Transitioning to mixed-use zoning with minimal oversight (approval by three commissioners) undermines the protections previously offered by McCall's R4 zoning.
- Residents fear that the county's multi-use zoning encourages suburban sprawl, lacks density controls, and erodes neighborhood continuity.
- The compatibility matrix proposed by the county is vague and lacks enforceable standards for setbacks, vegetative buffers, and shoreline protections.

3. Environmental and Infrastructure Risks

- The reduction in the impact area threatens protections for Payette Lake, a vital drinking water and recreational resource.
- The county's plan disregards existing and planned sewer and water infrastructure, especially around Payette Lake and Seaway Loop.
- Excluding areas already served or planned for city utilities contradicts the Idaho Code criteria for impact area designation.

4. Property Value and Community Character

- Residents purchased homes in the AOI expecting city zoning protections; the proposed changes jeopardize property values and community planning.
- The ordinance risks replacing coordinated city planning with fragmented development, harming scenic byways and agricultural lands.
- The removal of overlay districts and scenic protections (e.g., West Mountain Road) diminishes the area's visual and ecological integrity.

5. Governance and Representation

- The ordinance centralizes development decisions with the county commissioners, reducing city and community input and will lead to higher taxes. Taxes will continue to increase as the city will have to augment decisions made by the county as the city expands and county infrastructure ages. The citizens of the city of McCall will not have representation in their tax dollars with the decisions of the county and will be essentially paying for two cities, the city of McCall and the "city" created by the impact area.
- Many residents voiced concern that the county is using new legislation to seize control from cities, ignoring collaborative planning efforts.
- The Board has not addressed staffing needs for planning, law enforcement, or infrastructure that would accompany expanded county
 oversight and how the county plans to pay for these necessities.

6. Data and Legal Compliance

- The county's justification for the boundary reduction lacks data-driven analysis and fails to consider all criteria outlined in Idaho Code 67-6526
- The City of McCall's infrastructure expansion plans and annexation history were dismissed without substantive review.
- Legal concerns were raised about the feasibility of a five-year annexation timeline and the lack of mechanisms to compel annexation.

7. Recommendations Ignored

- · Mayor Bob Giles and other city officials proposed a five-step framework for responsible transition, which the Board did not adopt.
- Planning experts and community coalitions advocated for a comprehensive plan revision before implementing drastic changes—this was not pursued.
- · Suggestions for special zoning districts around Payette Lake to preserve environmental and development standards were not considered.

Recommendations for the Board

- Withdraw Ordinance 2025-06 until a comprehensive, data-driven plan is developed collaboratively with the City of McCall.
- Maintain the current AOI boundaries and zoning protections until public concerns are addressed through transparent and inclusive processes.
- · Commit to a joint revision of the county-city land use plan that aligns with state statutes and community values.



To: Valley County Planning & Zoning Commission

From: Dawn Matus
Date: October 23, 2025

Re: Amendments to Valley County Comprehensive Plan & Valley County Code

Dear Commissioners,

I am unable to attend today's public hearing. Having read in the meeting notice the surprising admonishment that "if you do not submit a comment, we will assume you have no objections," I ask that you please read the following, while incomplete, into the public record.

- Language and standards: The use of vague language and a lack of enforceable standards throughout the draft Comprehensive Plan is very concerning, because it raises serious doubts that the plan will be of any practical use as a planning and growth tool. I urge you to pause on moving toward adoption of this plan until it is revised to incorporate clear and specific language and standards for measuring and/or monitoring compliance.
- Zoning: Valley County is one of only two counties in Idaho that retain
 performance-based zoning. Given the significant current growth and
 development pressures, this approach is no longer appropriate or wise for the
 future of our county as viewed from a number of perspectives, including safety,
 sustainability, attractiveness (important to our tourism-reliant economy) and
 livability. I echo the many others in our county who have urged Valley County to
 adopt traditional county-wide zoning.
- Land-use maps: The new maps introduced on pages 92-94 and land-use designations represent a significant change. However, explanation is lacking concerning the rationale behind their placement and intended purpose. The extensive "residential zoning" areas are particularly concerning. I urge the commission to fully engage the public and explain the rationale and methodology behind the design of these maps and their intended use before considering their adoption.

Thank you for the opportunity to comment on this important matter and for incorporating the public's feedback into the Comprehensive Plan.

Sincerely, Dawn Matus 608 Woodlands Dr



rezoning

From Richard Bush

Date Thu 10/23/2025 12:42 PM

To Cynda Herrick <cherrick@valleycountyid.gov>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We have been out of town, and read the notice of public hearing after the October 16th deadline.

Understanding that deadline we disagree with your assumption that we would have no objections.

We have lived at 995 S. Samson Trail for 24 years. We have seen this residential area encroached upon by non-residential developments. We absolutely oppose the proposal to rezone lands in the previous McCall Impact Area to Multiple Use Zoning.

Richard and Pamela Bush

995 S. Samson Trail

(former McCall Impact Area)

McCall





Reconsider McCall AOI (public comment for meeting today)

From Tyler Harris

Date Thu 10/23/2025 12:54 PM

To Cynda Herrick <cherrick@valleycountyid.gov>

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Cynda,

Please include the following with the "oppose" comments. Thank you.

Dear County Commissioners,

I appreciate the work you all are currently performing to bring the county building codes more in line with the City of McCall building codes. This certainly would alleviate many of the concerns with removing the area of impact.

However, it remains to be seen if the county has the resources or desire to implement and enforce these codes. This is no small feat given the amount of development in the valley.

I oppose the counties plan to remove the area of impact as it stands. If the county is able to demonstrate effective enforcement of more stringent codes protecting our watershed, this could be reconsidered at a later time.

Thank you,

Tyler Harris 940 Sylvan Creek Road McCall, ID

Sent from my iPhone





Big Payette Lake Water Quality Council, Inc. P.O. Box 3108 McCall, ID 83638

October 23, 2025

Subject: Valley County Comprehensive Plan and Code Amendments - For the Hearing Record

Commissioners,

The Big Payette Lake Water Quality Council submits these comments and recommendations.

- Adopt and codify all recommendations of the Valley Soil and Water Conservation District with regard to water quality and watershed protection criteria.
- Regarding the substantial elimination of the City of McCall Area of Impact within the Payette
 Lake watershed, we ask that the County defer to City of McCall officials on land use
 regulations and decisions which may impact its source water quality, impact the character of the
 community, and affect other such local criteria which are addressed in the City's Comprehensive
 Plan and related planning documents.
- 3. Consider that under the recommendations of the 1998 Big Payette Lake Management Plan and Implementation Program ("the Plan") to which Valley County was signatory, a specific expansion of the McCall AOI was called for but never done. At section 9.3, Recommendations, the Plan states, "To facilitate consistent application of water quality protection measures, the Council recommends that the boundaries of the Area of City Impact be modified to include all of the state administered lands designated for economic development.". This recommendation aligns with the City water utility's responsibility to ensure long-term source water quality through appropriate land use authority.
- 4. Valley County's waterways, lakes and source waters differ greatly in their characteristics and public uses on a local level. Adopt planning criteria and code which allow for and facilitate the formation of Lake Management Districts with elected boards. Adopt planning criteria and code which allow for and facilitate the formation of Source Water Protection Districts with elected boards where a Source Water Protection Plan (SWPP) has been adopted. County Code should delegate to such Districts the duty to review, approve or disapprove permit applications which may impact the quality and characteristics of waters within their scope.
- 5. Continue this public hearing to evening sessions in each community for the public's benefit.
- 6. Establish discrete zones to go with proposed land use maps to foster clarity and coherence.
- 7. Concerning the overall scope of the Comprehensive Plan, adopt and reference the recommendations of the County Waterways Plan to establish at least a 500 foot no-wake zone and restricted watercraft operation in water less than 20 feet in depth on Payette Lake, and further, we recommend the County proceed to codify those recommendations through amendments to the Valley County Waterways Ordinance.

We appreciate your work to revise the Comprehensive Plan and ordinances, and ask that a thoughtful public process continue, allowing adequate time for a good result.

Sincerely,

Board of Directors, Big Payette Lake Water Quality Council, Inc.



Definitions Fuel Break adding the verbage "typically utilizing topogragicy to its advantage" * not sure where it would fit but as alternative Could be stated in the guidance menual. 1/2) VCFWG Strike the reference to the West Central RC:D resoning they no longer exist Stable los Fire Resistant real definition Wild Fire ; WILL change to NWCB definitions. Wildfire - "A wildland fire origination from an complemented ignition, such as lightning, deleand, unauthorized and accordental human caused fires, and Prescribed fires that are declared wild fires, wat - The line, and, or some where street was and other human development most or intermigle willy undersloped wildland or vegetative Riels (Prosoning consistency) 10-7-3 Basis & Recommendin change language - Utilize the current International Fire Code adopted by Vallage County Resoning don't have to droupe date with now adoption 10-7-4 Submission Requirements odd SITPA and respective Fire Districts to apprecia that plan Should be submitted to Bu comments EXHIBIT /D Drive voys '5200"

WII Fire Protection Plan Chapter 7