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May 16, 2025

Valley County Board of Commissioners 219 N. Main Street PO Box 1350 Cascade, ID 83611

## RE: Proposed Modification of the McCall Area of Impact Boundary

Dear Commissioners,

In accordance with Idaho Code § 67-6526 and the shared commitment of both our jurisdictions to coordinated, responsible planning, the City of McCall respectfully requests that the Valley County Board of Commissioners modify the existing McCall Area of Impact (AOI) boundary, as provided on the map attached hereto as EXHIBIT A. Consistent with the information presented to you at our joint meeting, the proposed AOI is very similar to the current AOI, with some relatively minor adjustments made consistent with the requirements of the Statute.

Modification of McCall's AOI should be defined by a process rooted in statutory compliance including a reasoned analysis of available facts and data. Our current AOI represents over four decades of successful cooperative planning and administration. The City's proposed modifications to the AOI reflect removal of those parcels from the current AOI that otherwise meet the criteria for inclusion in the AOI but exceed the maximum buffer allowed under Idaho Code §67-6526(4)(b), which states that the AOI must not extend more than two (2) miles from city limits except where necessary to include an entire county-recognized parcel that is partially within the two-mile limit. Additionally, two adjustments have been made to avoid splitting existing subdivisions. The City's proposed modifications also include adjusting boundary lines to follow actual parcel boundaries. We look forward to a full presentation of the City's underlying data and analysis at the public hearing required by the statute.

Please note that the City's proposal does not include expansion of the AOI that was discussed during the joint work session on May 5, 2025. It is the City of McCall's position that any significant changes to the AOI that are not strictly required to meet Idaho Code §67-6526, including regulatory and ordinance changes, should be determined as a result of the McCall Area Comprehensive Plan update process which requires extensive public participation.

## Request to Maintain Existing AOI Codes and Administration

The McCall AOI has long served as an area of transition between the City and the County. The current AOI has provided a stable and effective model of joint governance since 1979. Land use applications are administered by the City of McCall staff, reviewed by a joint Planning & Zoning

Commission, and ultimately decided by the Valley County Commissioners. Residents and property owners in the AOI currently have representation in the land use process through the three AOI seats on the joint Planning and Zoning Commission. Each of these Commissioners was appointed by the County Commissioners. This framework reduces the administrative burden on the County, ensures development consistency in areas of growth or geographic significance near the city limits, and provides a predictable regulatory framework for property owners and developers.

Given the significant investment in policy alignment, planning, studies, and public outreach—culminating in the 2018 McCall Area Comprehensive Plan—any changes to zoning codes or planning authority should occur after significant public input during the scheduled 2026 update of the Comprehensive Plan. Making adjustments to the regulatory framework on an accelerated timeline risks excluding public participation in these important policy decisions, increasing administrative inefficiency, and creation of regulatory uncertainty. Furthermore, and perhaps most importantly, hasty changes to the regulatory scheme will create uncertainty for landowners and developers within the AOI, the surrounding county, and adjacent areas of the City.

## **Timing and Budgetary Considerations**

The City is submitting this request for modification at this time to ensure stable operations and informed budget-setting. We have also conducted significant study and analysis on the AOI, and want to ensure the public has adequate time to participate in the process. As you are aware, Idaho Code § 67-6526 requires the County to make a decision on this request within ninety (90) days. This timeline should ensure both jurisdictions will have time to budget for appropriate resources and staff for the coming year.

We appreciate Valley County's statutory role and collaborative approach to modifying the McCall AOI and look forward to jointly maintaining what has proven over the past decades to be an effective model of intergovernmental planning.

Respectfully submitted,

Robert S. Giles

Mayor, City of McCall

Attachments: Exhibit A: Proposed AOI Boundary Map

cc: McCall City Council

McCall Area Planning & Zoning Commission

Valley County Planning Staff

## **Proposed Modified McCall Impact Area Boundary**



