

Dear Valley County P&Z Commissioners,

We are writing in opposition to the Red Ridge Village PUD Concept application.

We are asking you not to advance a recommendation to the Board of County Commissioners on August 27.

This is the first time in six months, after the Commission held four work sessions with DF Development that the public is allowed to provide comment.

This opposition letter is in addition to the many concerns we outlined in our written comments for and testimony at the February 25, 2026 public hearing, and our additional email for the Commission dated March 30, 2026 regarding your March 31, 2026 work session.

Section I: Process Concerns

Section II: Impact Studies Scorecard

Section III: Valley County's Infrastructure Is Already Over Capacity — No Recommendation Should Move Forward

Section I: Process Concerns

The process informing this Commission's recommendation is skewed in the applicant's favor. We request that you address these concerns at the August 27, 2026 public hearing, and determine the process changes you will make. The following are P&Z Commission procedural concerns:

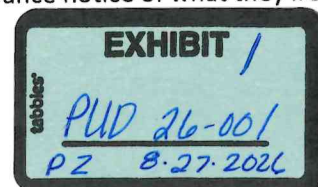
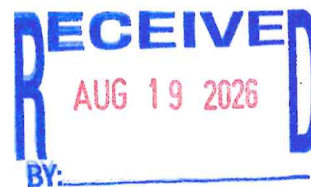
1. The public must comment before seeing the applicant's materials or staff's analysis.

Timeline: Public Comment vs. Applicant/Staff Materials

- August 19 — Public written comment deadline (8 days before the hearing).
- August 20, 21, or 24 — Per P&Z Director, the staff report, which will include attachments of information (applicant information/documents/agency information) that has been accumulated since the last public hearing is expected to post — *after* the public comment deadline has already passed.
- No deadline at all — DF Development's August 27 presentation; the P&Z Director has confirmed it will post whenever received, with no cutoff.
- August 27 — Hearing date. Based on precedent, the public may see DF's presentation for the first time only once the hearing begins.

Why this matters — the February 25 precedent:

- DF Development presented a 52-slide presentation, including 13 slides responding directly to public letters and agency reports.
- That presentation was not posted until the hearing had already started.
- Neither the public nor affected agencies had any opportunity to review DF's rebuttal in advance, or to prepare an in-person response to it.
- VCC 9-5H-11(K) guarantees the public a chance to address new information presented by the applicant — but a safeguard that only activates once the applicant is already speaking, with no advance notice of what they'll say, is largely theoretical in practice.



Net effect: The public must finalize written comment more than a week before the hearing, blind to both P&Z staff's analysis and the applicant's response — while the applicant faces no equivalent constraint and can shape the record in real time, with no opportunity for the public or agencies to review or rebut it in advance.

2. Inconsistent notice language. The published newspaper notice states that comments over one page must be submitted at least 7 days before the hearing. But the Public Hearing Notice sets the deadline at August 19 — 8 days before the hearing, not 7 — so the notice's own stated rule and its own stated deadline don't match.

3. Improper notice language: The Public Hearing Notice (not the newspaper notice) contains the sentence “If you do not submit a comment, we will assume you have no objections.” Silence does not mean consent. That language continues to be included in all Valley County P&Z Public Hearing Notices. However, it is NOT included on the Board of County Commissioners Public Hearing Notices. Why is that?

We have formally objected to that language in our written comments for P&Z Public Hearings on October 23, 2025, and on February 17, 2026. We requested that you direct the P&Z Director to remove from all future hearing notices. It remains in the notice for this hearing.

4. No remote testimony option for the public. Public testimony must be delivered in person in Cascade, with no video or call-in option — while DF's representatives and multiple P&Z Commissioners have participated remotely in this same process via the county's existing Teams platform. Members of the public, including us, have formally requested remote testimony be extended to the public. That request has not been granted.

5. No county-controlled process for scoping and reviewing studies on a project this size. Valley County has no ordinance or written standard governing which impact studies a PUD/CUP of this scale requires, or how they are to be scoped and reviewed. See the Impact Studies Scorecard below for more details.

Each of these five asymmetries benefits the applicant's ability to shape the record and limits the public's ability to respond to it. This commission should not advance a recommendation built on a process this unbalanced.

Section II: Impact Studies Scorecard

Red Ridge Village PUD — Impact Studies Scorecard as of August 19, 2026

Study	Who Scoped It	Top Key Deficiencies
COMPLETED — BUT DEFICIENT		
WUI Fire Protection Plan	Colin Chambers, DF Development employee —lacked required Valley County Professional Forester designation at time of writing and submitting the plan. P&Z Commission approved his designation on February 12, 2026 without the above being disclosed to them.	• Checklist-compliance letter, not a life-safety determination — conditionally approved before treatment locations were even specified • 100-ft perimeter buffer / 35-ft road fuel breaks not tied to any site-specific fire behavior modeling • Single named control line (Red Ridge Rd) with no redundant control line or independent evacuation route • No evacuation-capacity analysis; no coordination with Sheriff's office • Water supply, fire flow, and apparatus access left for the fire district to "consult" on later • No ignition-resistant construction standard required (e.g., NFPA 1140/IWUIC) • Doesn't resolve McCall Fire's own statement it can't serve this project without a new station and funded tax override

Study	Who Scoped It	Top Key Deficiencies
Traffic Impact Study – original and revised	Study area "defined based on conversations with the development team" — DF Development, not the county. An independent third-party must scope a new traffic impact study and complete the comprehensive analysis.	- Reviewed only 7 intersections - Multiple intersections projected to fail by 2029; several still failing in 2036 even after proposed mitigations - Mitigations (signals "when warranted," turn lanes) are unfunded proposals, not commitments - Trip generation uses a discounted "mountain community" rate with no independent data behind it 8,000+ daily vehicle trips added to roads, starting with rural West Mountain Rd, and continuing onto roads throughout county and beyond - Excluded from study is any inclusion of pedestrians and cyclists. - Excluded from study is any analysis of impact on Highway 55, already cited as the deadliest road in Idaho, Highway 95, Smylie Lane and other Valley County Roads.
Fiscal / Economic Analysis (BBC)	RFP scoped by DF Development; proposals sent to a DF email address; DF supplied key assumptions and reviewed the draft before the county saw it	- Largest revenue line (property tax) rests on developer-supplied home values, benchmarked to 2 of Idaho's most exclusive communities — no independent appraisal - Projects a fire district surplus that directly contradicts McCall Fire's own statement it cannot serve the project without new funding - Major capital costs excluded: fire station, road improvements, water system capital, school facilities - BBC's own report says a comprehensive public safety impact study is still needed — it doesn't exist
Technical Drainage Memo	Commissioned directly by DF Development (Kimley-Horn, prepared for DF Development LLC)	- Explicitly labeled "preliminary" — a broad overview meant to "inform future detailed drainage analysis," not a final engineering study - No modeled data yet demonstrating historic hydrologic conditions will actually be maintained - Wetland and riparian protection claims not yet backed by a completed wetland delineation
NOT REQUIRED YET BY P&Z COMMISSION / NOT COMPLETED		
Independent Water Availability / Aquifer Study	Not completed — DF representative has stated informally that they do not believe it will be a problem.	- Valley Soil & Water Conservation District has repeatedly, in writing, told the county a 3rd-party, independent, comprehensive hydrogeological study and aquifer modeling is required before concept approval - McCall itself abandoned groundwater as a water source after finding it inadequate — never addressed for this site - No independent evidence exists
Wetland Delineation	Not completed	Referenced as a future task in the drainage memo and ecological appendix; not yet performed or verified

Study	Who Scoped It	Top Key Deficiencies
Wildlife Survey (incl. threatened species)	Not completed	• Site is documented habitat for the Northern Idaho Ground Squirrel (federally threatened) and elk migration corridors • No independent field survey confirming impacts or adequacy of proposed mitigation
Comprehensive Public Safety Impact Study	Not completed	• BBC's own fiscal report states the fire and EMS districts have requested this study — it does not yet exist
Independent Evacuation / Emergency Access Capacity Analysis	Not completed	• No study of whether several thousand residents and guests (plus vehicles, pets, livestock) can evacuate under fire conditions; no coordination with Sheriff's office or emergency management
Engineered Drainage / Storm Water Study	Not completed	• Only a preliminary overview memo exists; detailed engineering analysis and modeling remains outstanding

Section III: Valley County's Infrastructure Is Already Over Capacity — No Recommendation Should Move Forward

A recommendation on RRV right now is premature. The logical next step is to require independent, third-party studies — funded by DF Development but scoped and controlled by the county — before this application goes any further. The following context explains why timing matters.

1. Countywide growth is already outpacing infrastructure capacity. At the Valley County Board of County Commissioners' August 3 meeting, the BSU Resilience Institute requested \$35,000 to help fund the next phase of its Infrastructure and Environment Decision-Making Dashboard Tool for the West Central Mountain Region; BOCC approved that funding on August 10. The presentation itself noted that new development is outpacing infrastructure capacity and environmental limits, creating long-term risk. Commissioner Roberts has said the county needs “long-term planning ... that involves a balanced and thoughtful process for how we shape growth in Valley County.” That effort just began and will take time — it will include a mapping tool showing the cumulative impact of every PUD and subdivision already approved countywide, using data the P&Z Department already tracks in its Annual Summary workbook. We ask the Commission to request that data at its next RRV work session, since every already-approved development needs to be factored into how this application is evaluated.

2. The road network RRV depends on is already showing strain. Two “grandfathered” gravel pits have been running nonstop this summer — outside their permitted 7 a.m.–7 p.m. hours — off West Mountain Road, and the P&Z Commission approved yet another gravel pit on the same road at its August 13 meeting. During an August 10 BOCC budget discussion, the Roads Director identified road safety as the department's single biggest concern: the county cannot keep pace with culvert replacements, ditching, brushing, tree removal, soft-spot repairs, blading, or grading, with only three graders and three water trucks to serve the entire county — less than 5% of needed culvert replacements have been completed. That same week, a member of the public was found patching potholes without a permit.

3. Identify what this Commission doesn't yet know to ask. As you consider RRV, what additional expertise does this Commission need — an engineer, a hydrogeologist, a fiscal analyst — to ask the right questions of this application? We ask that you identify that gap now, rather than after a recommendation has already been made.

4. Schedule a dedicated work session before any recommendation, don't rely on a staff summary. A logical next step after the August 27 hearing is a work session dedicated to reviewing everything the Commission received from the public and from agencies, in full — not a spreadsheet summary from P&Z staff. No spreadsheet cell can capture the full context behind a member of the public's or an agency's concern. At the end of that work session, it will become apparent the many work sessions needed next, broken out by topical areas such as water, traffic, safety.

Given the pace of growth already straining Valley County's infrastructure, road system, services and staff capacity, recommending RRV would only compound the strain already documented above.

Without the independent impact studies described in Section II, a recommendation would be premature, irresponsible, and inconsistent with this Commission's obligation to base its recommendation on evidence.

Respectfully,
Rebecca & Scott Hurd
McCall