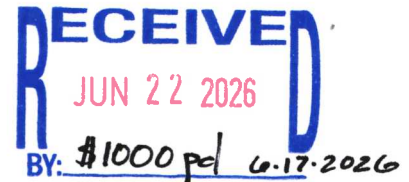


Matthew C. Parks
(208) 388-0106
MParks@ClarkWardle.com

Via email - cherrick@valleycountyid.gov; lhunter@valleycountyid.gov

June 22, 2026

Board of County Commissioners
Valley County Board of Commissioners
Valley County, Idaho



Re: **Appeal of Planning and Zoning Commission Denial**
SUB 25-019 – Rocky Mountain Storage
14014 Highway 55
McCall, Idaho

Dear Chair and Commissioners:

On behalf of Pearson Storage Partners, LLC ("**Applicant**"), this letter constitutes a timely appeal of the Valley County Planning and Zoning Commission's June 11, 2026, denial of SUB 25-019 Rocky Mountain Storage.

This matter returns to the Board following the Board's remand of the application to the Planning and Zoning Commission. During the first appeal hearing, the Board determined that additional information should be considered regarding traffic impacts and visual mitigation measures. The Board specifically remanded the application for further consideration of new information, including the Traffic Impact Study (TIS) and mitigation of visual impacts. The Applicant complied with the Board's directive and submitted substantial additional information addressing those issues.

Following remand, revised plans, renderings, landscaping concepts, visual screening measures, traffic-related materials, and other supporting information were submitted for consideration by the Commission. The Applicant substantially revised the project following remand and incorporated architectural enhancements, windows, extensive landscaping, berms, and visual screening measures specifically intended to reduce the visibility and massing of the buildings.

The proposed facility is compatible with the surrounding area and adjacent uses, particularly given the commercial character of the Highway 55 corridor and the existing mix of commercial, industrial, and residential development in the vicinity. Moreover, the Board's prior remand specifically directed that additional information regarding traffic impacts and visual mitigation be

Date: June 22, 2026
Page: 2

considered in evaluating compatibility, and the Applicant provided the requested information. The TIS and comments from Parametrix confirmed that the project would not create adverse traffic impacts and that access-related concerns could be adequately addressed. The Board requested confirmation that the conclusions of the Traffic Impact Study and ITD's determination that turn lanes were unnecessary were supported by the County's traffic engineer. The Applicant provided precisely that information.

From: Cody Janson <CJanson@parametrix.com>
Sent: Friday, April 10, 2026 8:41 AM
To: Cynda Herrick <cherrick@valleycountyid.gov>; Kerstin Dettrich <KDettrich@valleycountyid.gov>
Cc: Paul Ashton <pashton@parametrix.com>; Mitchell Hadfield <MHadfield@parametrix.com>
Subject: FW: Rocky Mountain Storage - Traffic Analysis

Good morning,

Please see the email below from our traffic engineer regarding this TIS and let us know if you have any questions or need anything else.

Thank you,

Parametrix

Cody Janson
Senior Engineer / ESOP Trustee
208-906-1154 | direct
208-921-5480 | mobile



From: Mitchell Hadfield <MHadfield@parametrix.com>
Sent: Thursday, April 9, 2026 6:06 PM
To: Cody Janson <CJanson@parametrix.com>
Cc: Paul Ashton <PAShton@parametrix.com>
Subject: RE: Rocky Mountain Storage - Traffic Analysis

Hi Cody

I have reviewed the Rocky Mountain Storage Traffic Analysis and the associated ITD staff report. **From my perspective, the analysis is sound. I do not have any comments to the contrary.**

Here is a recap of the analysis / ITD staff report:

The storage facility is located on the east side of SH-55, just south of the McCall School District Bus Facility and will consolidate three existing accesses on SH-55 to a signal access. The analysis checked turn lane warrants using projected 2030 turning movement volumes including trips for the storage development. NBR and SBR turn lanes are not warranted. NBL and SBL turn lane volumes meet warrants both with and without the project. The left turn lane warrant threshold is 5 vehicles per hour, and the projected 2030 volumes include 5 NBL vehicles in the peak hour and 10 SBL vehicles in the peak hour. Though the NBL and SBL volume technically meets turn lane warrants, the analysis does not recommend their construction. The analysis cites ROW concerns with roadside ditches, benefit cost, low project trip generation, and adequate sight distance without the turn lanes as reasons not to construct NBL / SBL turn lanes. **ITD concurs with the analysis and is not requiring any turn lanes.**

The Applicant provided the TIS to ITD, which concluded that turn lanes were not required. The County's traffic engineer reviewed the TIS and confirmed that the analysis and recommendations from ITD were professionally sound, agreeing with the conclusions reached by both ITD and the Applicant's traffic engineer. Accordingly, the record demonstrates that traffic and access

concerns have been thoroughly evaluated by the appropriate agencies and professionals and that the project satisfies the applicable traffic-related approval criteria.

In addition to addressing traffic and access concerns, the evidence submitted following remand demonstrates that the project can be developed in a manner that is compatible with neighboring properties and preserves the character of the area. The revised plans incorporate substantial landscaping, berming, architectural enhancements, windows, and visual screening measures specifically intended to minimize visual impacts and ensure compatibility with neighboring properties and the Highway 55 corridor. In addition, the neighboring properties to the east and south are situated at higher elevations, further mitigating visual impacts. The resulting proposal reflects a thoughtful balance between development and preservation of the character of the area. Because the record demonstrates compliance with the applicable approval criteria and because any remaining concerns may be adequately addressed through reasonable and uniformly applied conditions, the Applicant respectfully requests that the Board approve the application subject to such conditions as the Board deems appropriate.

I. STANDARD OF REVIEW

Under the Valley County Code:

- An aggrieved applicant may appeal a final decision of the Planning and Zoning Commission to the Board of County Commissioners;
- The appeal must state the specific grounds upon which the decision is alleged to be erroneous;
- The Board reviews the record, applicable code provisions, and evidence, and may affirm, reverse, or modify the decision; and
- The Board's decision must be based upon adopted standards and supported by substantial evidence in the record.

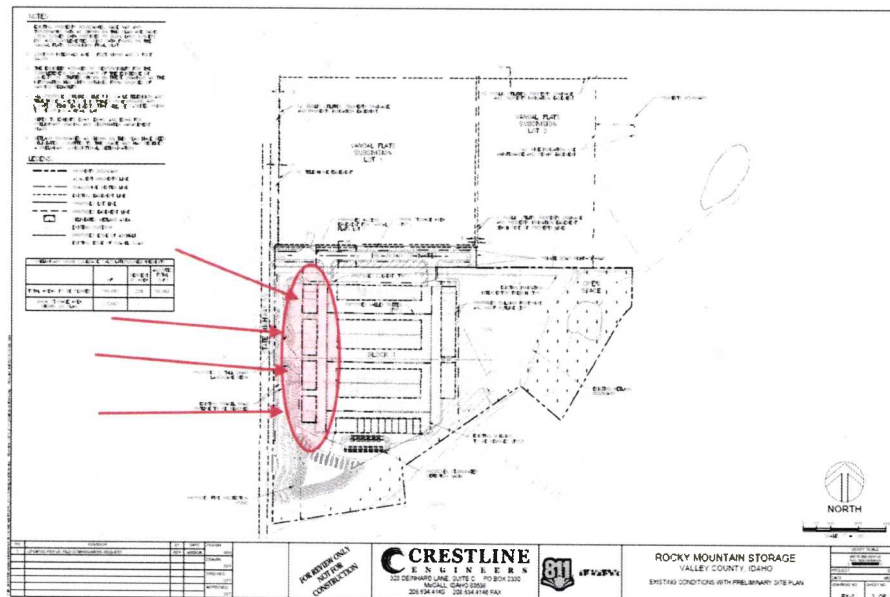
The Board's review should focus upon whether the application satisfies the applicable approval criteria based upon the record as a whole. As discussed below, the evidence submitted by the Applicant demonstrates that the project satisfies those criteria and merits approval subject to such reasonable conditions as the Board deems appropriate.

II. THE APPLICANT ADDRESSED THE ISSUES IDENTIFIED BY THE BOARD ON REMAND

The purpose of the Board's remand was clear. The Board directed the Planning and Zoning Commission to further consider new information relating to traffic impacts and visual mitigation.

In response, the Applicant submitted extensive additional information, including revised site plans, revised renderings, additional landscaping information, visual mitigation measures, access-related materials, and traffic-related information intended to address the concerns

identified during the first appeal. The project has been revised to break-up the initially proposed one long building along State Highway 55 into 4 separate buildings. Significant landscaping has been proposed. Windows have been added to provide contrast along the building faces. This was highlighted and pointed out to the Commissioners. The following rendering was included in the materials submitted to the Commissioners.



The Applicant participated in a lengthy review process spanning multiple public hearings over many months. Throughout that process, the Applicant repeatedly revised the proposal and provided additional information in response to requests from staff, agencies, the Commission,

and the Board. The additional information submitted following remand directly addressed the issues identified by the Board and provided further support for approval of the application.

The additional evidence submitted in response to the Board's remand demonstrates that those concerns have been substantially addressed through landscaping, screening, architectural enhancements, and other mitigation measures. Consideration of the complete record, including the materials specifically requested by the Board, supports approval of the application.

III. THE PROJECT IS COMPATIBLE WITH THE CHARACTER OF THE AREA AND MERITS APPROVAL

The property is located within an area where commercial development is anticipated and permitted subject to approval of a conditional use permit. The proposed use is a low-intensity storage condominium facility that generates limited traffic, limited noise, and limited daily activity when compared to many other commercial uses that could be developed within the same area. The project is located along the Highway 55 commercial corridor and is surrounded by a mixture of commercial, storage, industrial, transportation-related, and other non-residential uses. The Applicant submitted evidence demonstrating that the project can operate without creating unreasonable impacts upon neighboring properties or public services.

Commissioners Maupin and Thompson concluded that the project is compatible with the area, and Planning Director Herrick reached the same conclusion. Although differing views were expressed regarding aesthetics and appearance, the revised project incorporates extensive landscaping, architectural enhancements, berms, windows, and visual screening measures designed to ensure compatibility with neighboring properties and preserve the character of the Highway 55 corridor. Commissioner Schneider also expressed the view that the project is compatible with the surrounding area. The fact that multiple commissioners and the Planning Director independently concluded that the project is compatible further supports approval of the application.

IV. THE CURRENT APPLICATION SATISFIES THE APPLICABLE APPROVAL CRITERIA

During deliberations, Commissioner Roberts referenced the fact that the Applicant had previously represented that the proposed storage buildings would be used for personal storage purposes and that no land use approval was therefore required. To the extent Commissioner Roberts expressed concern that the Applicant subsequently elected to pursue approval for a commercial self-storage facility, such concern does not provide a basis for denial under the Valley County Code. Accordingly, the Board's review should focus on the current proposal and the evidence contained in the record, rather than the evolution of earlier concepts, as the record demonstrates that the project is compatible with the surrounding area and satisfies the applicable approval criteria.

Property owners are entitled to modify development plans and pursue different lawful uses of their property. The fact that the current proposal differs from earlier concepts is not evidence that the project is incompatible with the surrounding area or otherwise fails to satisfy the applicable approval criteria. Indeed, by seeking approval for the present proposal, the Applicant subjected the project to public review, technical studies, and the imposition of reasonable conditions designed to address traffic, visual impacts, and neighboring uses.

The issue before the Board is whether the present application satisfies the standards established by the Valley County Code. When evaluated on its own merits and based upon the record as a whole, the project satisfies those standards and merits approval. While the history of the project provides background, the Commission may not deny an application based upon dissatisfaction with the evolution of the proposal or a preference for a prior concept. The current application must be evaluated on its own merits and based upon the evidence in the record.

Likewise, neither prior approvals nor prior concepts establish binding precedent requiring approval or denial of future applications. Rather, each application must be judged on its own facts and under the applicable standards. Historical approvals and existing development patterns may provide relevant evidence regarding compatibility and the character of the area, but consideration of such evidence does not create a precedent or relieve the Commission of its obligation to evaluate the specific proposal before it. Conversely, concern that approval of the current application might create a "precedent" for future applications is misplaced, because future projects will likewise be evaluated independently based upon their own records and the applicable approval criteria.

The Board should evaluate the present application on its own merits, informed by the surrounding development pattern and other evidence bearing on compatibility, without concern that approval would establish a precedent for future applications. When considered under the applicable standards and based upon the record as a whole, the proposed project is consistent with the character of the area and merits approval.

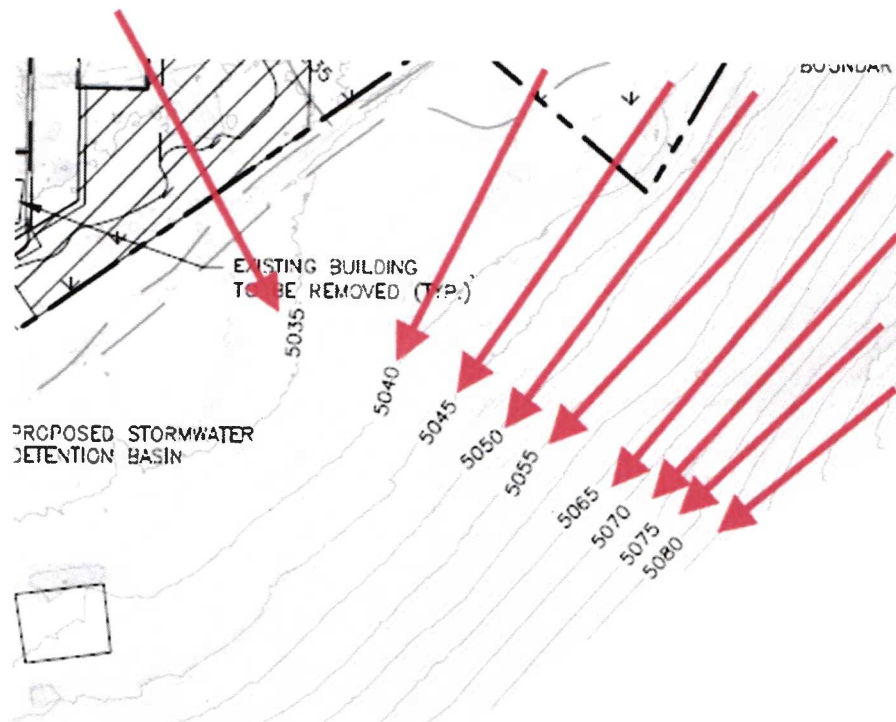
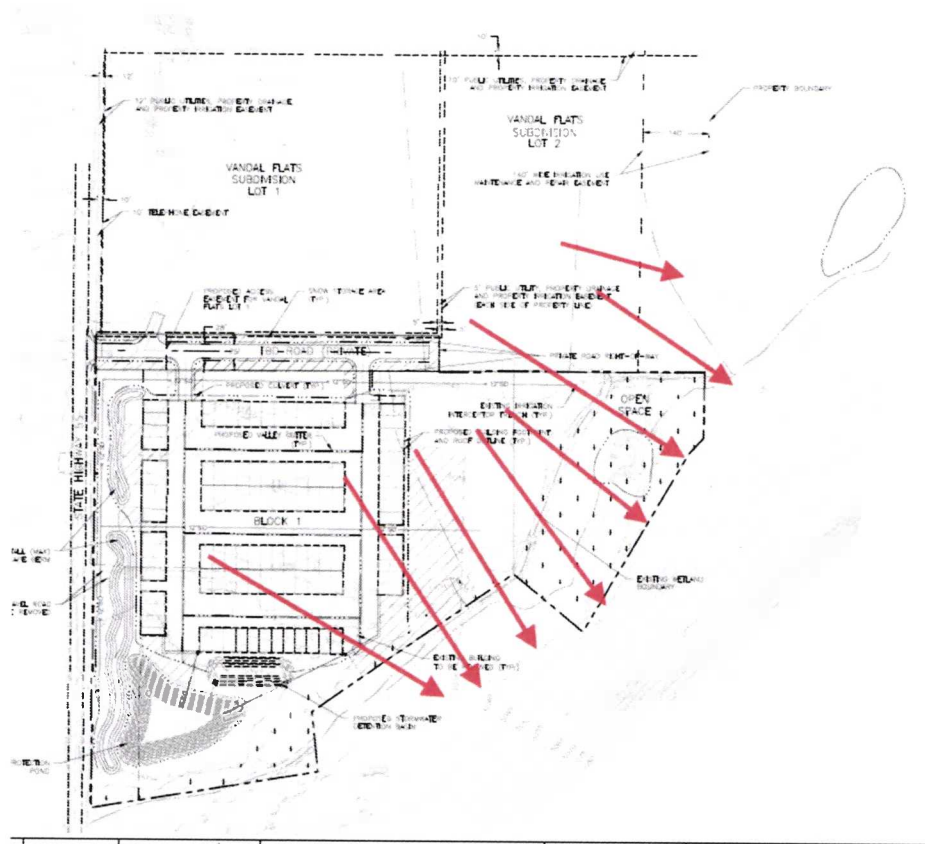
V. THE PROJECT DESIGN MINIMIZES VISUAL IMPACTS TO ADJACENT PROPERTIES

Commissioner Roberts also expressed concern that neighboring properties located east of the project would be negatively impacted because the project site sits at a higher elevation and the buildings would therefore be more visible. The record demonstrates that the neighboring properties to the east and south are situated at higher elevations than the project site, thereby reducing visual impacts and further supporting compatibility with surrounding uses. The record further demonstrates that the adjacent residential properties are situated at higher elevations than the project site, thereby reducing visibility and reinforcing the compatibility of the project with neighboring uses.

The following pictures in the record demonstrate that the residential properties adjacent to the project site are at a higher elevation.







While commissioners may evaluate evidence presented during a hearing, land use decisions must ultimately be supported by evidence contained in the record. Personal observations or assumptions that are not supported by testimony, reports, studies, or other competent evidence do not constitute grounds to deny a conditional use permit application. The Board's decision should be based upon the evidence contained in the record. The record demonstrates that the project site is situated at a lower elevation than adjacent residential properties and that the revised project design and landscaping substantially mitigate visual impacts to neighboring properties.

Moreover, the Applicant submitted revised visual mitigation measures following the Board's remand specifically intended to address visibility concerns. The Commission did not identify any objective standard that would be violated and did not cite evidence demonstrating that neighboring properties would experience undue adverse impacts.

VI. THE RECORD SUPPORTS APPROVAL OF THE APPLICATION

The proposed project is compatible with the character of the Highway 55 corridor and surrounding properties. The project incorporates extensive landscaping, berming, architectural enhancements, windows, and visual screening measures specifically intended to soften the appearance of the buildings and reduce their visibility from neighboring properties and the Scenic Byway. The Applicant's revised plans and renderings, together with the comments from Parametrix and other materials submitted following remand, demonstrate that the project can be developed without creating adverse impacts to the Scenic Byway or the surrounding area.

The proposed use is consistent with the existing pattern of development in the vicinity, which includes a mixture of commercial, industrial, and residential uses. The neighboring properties to the east and south are situated at higher elevations, further reducing visual impacts and reinforcing the compatibility of the project with the surrounding area. The Traffic Impact Study confirmed that the project would not create significant traffic impacts and that access-related issues could be appropriately addressed.

Throughout the review process, the Applicant demonstrated a willingness to refine the project and incorporate additional mitigation measures to address concerns regarding appearance, screening, and neighboring uses. The resulting proposal reflects a thoughtful balance between development and preservation of the character of the area. It is precisely the type of low-intensity commercial use contemplated along the Highway 55 corridor and demonstrates that compatibility can be achieved through thoughtful design, landscaping, and reasonable conditions of approval.

For these reasons, and based upon the record as a whole, the Board may reasonably conclude that the proposed project satisfies the applicable approval criteria, preserves the character of the Highway 55 corridor and Scenic Byway, is compatible with surrounding properties, and merits

approval subject to such reasonable and uniformly applied conditions as the Board deems appropriate.

VII. CONCLUSION AND REQUEST FOR RELIEF

Applicant provided substantial additional information following remand and repeatedly revised the proposal to address concerns relating to traffic, visual impacts, landscaping, screening, and compatibility with neighboring uses.

The proposed project is a low-intensity commercial use compatible with the Highway 55 corridor and surrounding properties.

The project incorporates substantial landscaping, architectural enhancements, berming, windows, and visual screening measures that preserve the character of the area and mitigate impacts to neighboring properties.

The Traffic Impact Study, ITD review, and concurrence by the County's traffic engineer demonstrate that the project satisfies applicable traffic and access considerations.

The Board may reasonably conclude that the project satisfies the applicable approval criteria and that any remaining project-specific concerns may be adequately addressed through reasonable and uniformly applied conditions of approval.

Accordingly, Pearson Storage Partners, LLC respectfully requests that the Valley County Board of Commissioners approve SUB 25-019 Rocky Mountain Storage and impose such reasonable and uniformly applied conditions of approval as the Board deems appropriate, consistent with the purposes and standards of the Valley County Code.

Respectfully submitted,



Matthew C. Parks