



North Ada County Foothills Association

One voice. One goal. One plan.

September 18, 2006

Mr. Pete Friedman
Mr. Jerry Armstrong
Ada County Board of Commissioners
Ada County Planning & Zoning Commission

Re: Draft North Foothills Sub-Area Plan, July, 2006

Ada County Officials & Staff:

Please accept this letter as NACFA's formal commentary on the County's Draft North Foothills Sub-Area Plan.

First, it is important to recognize that the County planning team has done an exemplary job in soliciting, understanding and responding to public input regarding priorities for and concerns about the future of this foothills area. As discussed below, we believe the Draft Plan warrants discussion and needs some refinement and further detail, but, as stated by County staff, that is what a "Draft" is all about. So, at the outset, we commend the County on the job done thusfar.

In an attempt to make our commentary and recommendations as concise as possible, while embracing the breadth of the planning process up to this point, we have assembled a "Summary of Public Input & the Draft Plan's Report Card", which is attached following this letter. The main messages/themes that emerge in the analysis contained in that "Summary" are:

- The Draft Plan attempts to strike a balance between two extremes in terms of an acceptable and feasible level of development in these foothills. These extremes are framed on one side by those who advocate no development in the area beyond that allowed by existing zoning. On the other side is the aggressive and, we believe, unacceptable targets being sought by development interests. We suggest that the overall development intensity recommended in the Draft Plan (i.e. ~11,000 dwelling units) is a reasonable target, at least a good starting point, given other objectives of the Plan. However, we believe that there are two areas in particular where the Draft Plan needs to be rethought and adjusted:

1. The Draft Plan is not equitable in terms of relative allowance for development in the Eastern area (Area C). It too rigidly interprets the constraints analysis (which is based on very generalized information), and suggests limitations on development that would preclude landowner/developer response to objectives for open space, trails, habitat preservation, etc. We believe that the distribution of development intensity should be more equitable between the Eastern and Western areas. This may mean an increase in allowable development in the Eastern area over that recommended in the Draft, but that may be the best means of creating the true “win-win” we seek. NACFA has been actively working with the major landowners in the Eastern area to find the right formula for this “win-win” (i.e. allowance for development at levels which can achieve meaningful dedication and maintenance of open space in large, contiguous tracts outside of developed areas). We will be happy to discuss this work and its results with the County.
 2. The “Central Area” (Area B) is not accurately drawn in the Draft Plan. We certainly agree that the central part of the study area (between highways 55 and 16) should have by far the least development (in fact, we advocate absolutely minimal development there). Priorities such as [1] concentrating development near the state highways to minimize traffic impacts on existing neighborhoods and the City of Eagle, and [2] creating a significant, regional open space framework outside of developed areas clearly argue for this approach to the central area. However, Area B should truly encompass the center, straddling Willow Creek Road (this road not only more accurately defines the center of the planning area, it also marks the boundaries between the three largest landowners. As Area B is drawn in the Draft Plan (i.e. completely east of the Willow Creek “centerline”), it exacerbates the inequities described above and does not promote equal participation in/contribution to creation of an open space framework by all the major owners (also a matter of equity).
- The Draft Sub-Area Plan does not go far enough in providing needed detail regarding [1] where development would actually occur, [2] at least the broad outlines of an open space framework outside of the developed areas, or [3] where necessary roadways and other infrastructure would go. We recognize that at least part of the reason for this is budget and schedule constraints. However, from the outset of our lobbying for this planning effort (starting with our original petition for it back in January of 2003), we have stressed that the hard questions must be answered/resolved regarding where and how much development, where and how much open space, and how existing communities and neighborhoods would be impacted. The Draft Plan still leaves these questions unanswered, instead addressing them only in broad, verbal terms. We therefore strongly urge the County to “go the rest of the way”, building on the excellent foundation embodied by the Draft Plan. This effort is needed not only because we truly want this process to paint the picture in sufficient detail so that both the interested public and the landowners can go about their lives without interminable discussion and potential for controversy. It is also needed to provide ACHD with the detail

they need to complete a meaningful and truly informative master roadways plan.

We appreciate your attention to and consideration of our commentary. We look forward to participating in the evolution of this Draft Plan, and to its ultimate adoption by the County Commission. If you have any questions or need further information, feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Petrovsky', with a stylized flourish at the end.

John Petrovsky
NACFA Chairman

North Ada County Foothills - Draft Sub-Area Plan

Summary of Public Input & the Draft Plan's Report Card

What the Public Said:	% in Favor	Is the Plan Responsive?			
		Yes	Part-way	No	Reason

Level & Location of Development

A significant portion of development should be located relatively close to highways or major roads.		81%			Note 1
Development Intensity should be:	Highest in Eastern area, near Hwy 55	58%			Note 2
	Lowest in Central area	80%			Note 3
	Highest in Western area, near Hwy 16	67%			
	Lowest in Southern area, near Eagle/Star	68%			
A reasonable level of development in this area is:	5,000 dwelling units or less	50%			Note 4
	10,000 dwelling units or less	73%			
	20,000 dwelling units or less	83%			
Identify most appropriate areas for future development		NQ			Note 1

Open Space, Recreation & Habitat

It is more important to protect open space outside of developed areas than within them.		77%			Note 1
Allow for clustering or density transfer to minimize development in sensitive areas, while allowing the same base density (average 10 or 40-acre lots).		64%			Note 5
Use planned community process to concentrate development in more focused areas.		78%			Note 1
A village concept or other means should be used in some areas to concentrate development and preserve open space.		66%			Note 1
Use density bonuses to allow for higher levels of development in exchange for permanent resource/open space protection within single ownerships.		78%			Note 2
Encourage voluntary donations of land or conservation easement to protect open space, trails corridors or other areas.		85%			Note 1
Maintain or increase the amount of publicly owned land.		68%			Note 6
Access to public lands or other areas with recreational opportunities should be maintained and/or enhanced.		92%			Note 6
A network of trails for hikers, mountain bikers and equestrians should be created and be accessible to the public.		90%			Notes 1 & 6
An appropriate % of land preserved as open space is:	35% or more.	73%			Note 7
	50% or more.	59%			
Provide a continuum of non-built areas and habitat protection; create an interconnected open space framework.		NQ			Notes 1 & 6

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North Ada County Foothills - Draft Sub-Area Plan

Summary of Public Input & the Draft Plan's Report Card

What the Public Said:	% in Favor	Is the Plan Responsive?			
		Yes	Part-way	No	Reason
Transportation & Other Infrastructure					
Highway 16 and 55 should be connected with a major east/west road.	36%				Note 1
Major new transportation facilities should not be considered to accommodate maximum potential levels of future development.	52%				Note 1
Development should be dependent on ... adequate supply of water, without adverse impacts on water supplies for existing residents or other users.	99%				Note 6
Ensure that new growth funds the cost of all public facility improvements needed to serve it.	NQ				Note 6

Notes:

NQ: Objective stated by large majority throughout process, but not part of quantification effort.

1. Need mapping of [A] where development will occur, [B] intended open space framework, and [C] locations and sizes of necessary new roads and/or expansions of existing roads.
2. Plan is not equitable, is too restrictive in the Eastern area.
3. "Central Area" not properly drawn.
4. The Draft Plan attempts to strike a balance (11,000 units) between existing zoning and the aggregate intent of the landowners/developers in the area. As indicated in Note 2, the Draft Plan is out of balance in the Eastern area, not allowing sufficient development to achieve the broad objectives for open space, habitat & recreation outside of developed areas; thus discussion & adjustment in this area is warranted. In any case, whatever recommended level of development is ultimately included in the Sub-Area Plan must be viewed as including Planned Communities (i.e. Planned Communities would be used as an implementation tool within the recommended ceiling). If, on the other hand, Planned Communities are allowed to remain a "wild card" allowed to circumvent/ignore this ceiling, then the Plan's treatment of development intensity is meaningless.
5. Not workable; insufficient development to achieve objective.
6. Embraced by Plan objective.
7. Draft Plan strikes a balance with 43% average