August 5, 2026

To: Valley County Planning & Zoning

Comments on the Red Ridge Village proposal

RECEIVED
BY:
AUG 10 2026

"Money talks" so there is no question this project will be approved, but please consider these items:

1. Water and sewer for the project should be centralized systems – NO individual wells or septic systems.

2. All county roads and lighting to be improved or constructed should be <u>entirely</u> financed by DF Development.

3. Recognize this proposed village will affect the landscape of Valley County.

You can bet this village will be second or third homes - very few year-round residents. Please don't get caught up with low cost housing proposals.

Thank you,

Glenn Jacobsen
PO Box 457
McCall, Id 83638

August 19, 2026

Dear Cherrick and Members of the Valley County Planning and Zoning Commission:

Re: Concerns Regarding the Proposed Red Ridge Development

I am writing as a Whitetail resident to express my concerns regarding the size and potential impact of the proposed Red Ridge development.

I want to be clear that I am not opposed to development. I recognize that McCall will continue to grow, and I support thoughtful, responsible projects that benefit the broader community. I am particularly supportive of creating more attainable housing for the people who have lived and worked in the McCall area for many years.

My concern is whether McCall and Valley County currently have the infrastructure and essential services necessary to support a development of this scale.

Our roads are already heavily congested, particularly during the summer months. Restaurants and grocery stores are often overwhelmed. Emergency medical services, hospitals, healthcare providers, dental services, and other critical resources are limited and frequently operating at or near capacity during peak seasons. Adding a large new community without first addressing these limitations would place even greater strain on services that are already stretched.

Before a project of this size is approved, I believe there should be a comprehensive and realistic infrastructure plan. That plan should clearly explain how the additional traffic will be managed and how emergency services, healthcare, utilities, grocery capacity, food services, schools, and other community needs will be expanded to support the increased population. It should also identify who will pay for those improvements so the burden does not fall primarily on existing residents.

The project should also include a meaningful commitment to attainable housing for local workers and longtime residents. If this development is intended to help address the area's housing needs, that commitment should be clearly defined and enforceable, rather than simply assumed.

As a Whitetail resident, I also believe it is important to protect the natural character of the area surrounding both communities. Adequate open space, natural buffers, and green areas should be maintained between Red Ridge and Whitetail. Thoughtful separation would help protect privacy, views, wildlife habitat, and the open landscape that makes this area so special.

Approving a development of this scale without first solving the related infrastructure and service challenges could permanently change the character of McCall. The additional development needed outside the project to support it could be just as significant as the development itself.

Again, I am not against growth. I am in favor of well planned development that respects the capacity of the community and preserves the quality of life that residents and visitors value. In its

current scale, however, I am concerned that Red Ridge could be damaging to McCall and the surrounding area.

I respectfully ask Valley County to carefully evaluate the project's full impact and require detailed, enforceable plans for infrastructure, essential services, attainable housing, traffic management, open space, and natural buffers before considering approval.

Thank you for your consideration.

Sincerely,

Anton Visser

Anton Visser
Whitetail Resident

From: Debbie Fereday <debfereday@gmail.com>
Sent: Wednesday, August 19, 2026 5:05 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Subject: Red Ridge - I sent these comments but it went to the wrong address!

Please accept my comments as the last address I had was incorrect. I am resending.

Deb Fereday

Dear Commissioners,

The large village proposal slated for the Red Ridge area is quite expansive.

The commissioners should fully vet this proposal to make sure the local taxpayers are not covering any of the cost for the infrastructure and the roads and the traffic congestion.

I am especially concerned about water quantity and water quality issues. Will there be a ground water study to determine if water is sufficient for this development?

Will the safeguards be in place so that no discharges of nitrogen and phosphorus enters the Payette River?

Deb Fereday
McCall, Idaho

From: Eric Young <epyoung1@outlook.com>
Sent: Sunday, March 1, 2026 1:36 PM
To: Valley County Road Department <roaddept@valleycountyid.gov>
Cc: Cynda Herrick <cherrick@valleycountyid.gov>
Subject: Valley Country Road and Bridge feedback on RRV roads study

2/28/2026

Dear Ms. Dettrich –

Thank you for your continuing work to maintain and improve Valley County Roadways. I am unable to attend the upcoming P&Z Commissioner Red Ridge Village workshop which you may be invited to attend, so I'm sending you this concern related to the RRV impact road study.

I, and others, are very concerned about your feedback letter to GSBS on the Hales engineering road study because it lacks the following bullet under your Possible Traffic Mitigation list:

- Curve Improvements for West Valley Rd/Wisdom Rd

As a frequent traveler of this road, many times, when travelling north bound on Wisdom, I have had to stop my vehicle at this curve to ensure it would not be hit by truck trailers headed south on Wisdom. In my opinion, this is an "intersection" where long vehicles are either required to, or tend to, "cut the corner" and enter the north (Wisdom) and east (West Valley) bound traffic lanes. Please include this intersection in your Traffic Mitigation list.

Thank you for your consideration,
Eric Young

Attachment:
PUD 24-01 VCRD 2-25-2026 Feedback

Valley County Road and Bridge

PO Box 672 • 520 South Front Street
Cascade, ID 83611-1350

Phone (208) 382-7195
roaddept@valleycountyid.gov

Thursday, February 19, 2026

Christine Richman
375 West 200 South,
Suite 100
Salt Lake City, UT 84101
United States
Cc: Planning & Zoning Administrator
Cynda Herrick cherrick@valleycountyid.gov

RE: Red Ridge – PUD 24-01 [P&Z Application Meeting Date 2-25-2026]

Dear GSBS & Wilks Brothers:
Thank you for submitting your concept plan for review. We appreciate the work that has gone into preparing the materials to this stage.

Please refer to the Parametrix review letter included for traffic engineering-related comments and guidance that needs to be addressed in forthcoming submittals.

The Road Department intends to continue discussions regarding off-site road mitigation (proportionate share), as provided for under the applicable provisions of the Valley County Code. It is anticipated that these obligations will be addressed within a development agreement to be prepared collaboratively by County staff and the applicants and subsequently negotiated and approved by the Board of County Commissioners. We encourage you to review the relevant code sections and be prepared to participate in this process as the project moves forward.

Possible transportation mitigation areas include:

- West Mountain Road rehabilitation (heading north) (heading south);
- Remediation at the two 90-degree curves on West Mountain Road;
- Intersection improvement for West Mountain Road/Wisdom RD/Chad Dr.;
- Intersection improvement for West Valley Rd/Boydstun;
- Intersection improvement for Smiley Lane/West Mountain Road;

Valley County Road and Bridge

PO Box 672 • 520 South Front Street
Cascade, ID 83611-1350

Phone (208) 382-7195
roaddept@valleycountyid.gov

Pending approval decision and as the applicant provides phased applications, detailed engineering plans shall be reviewed with TIS reporting by phase.

Thank you for your attention to these items. We look forward to working with you as the project progresses.

Thank you,

Kerstin Dettrich

Kerstin Dettrich
Valley County Road & Bridge Director

From: Lori Hunter <lhunter@valleycountyid.gov>
Sent: Monday, August 10, 2026 3:34 PM
To: Eric Young <epyoung1@outlook.com>
Subject: Re: RRV Fiscal Impact study

Mr. Young,

FYI - The final version of the Fiscal Impact Study was previously added to the website. I've also attached a pdf to this email.

Lori Hunter
Valley County Planning & Zoning Planner II
208-382-7115
700 South Main Street • P.O. Box 1350
Cascade, ID 83611

S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Cynda Herrick <cherrick@valleycountyid.gov>
Sent: Monday, June 29, 2026 8:12 AM
To: Eric Young <epyoung1@outlook.com>; Lori Hunter <lhunter@valleycountyid.gov>
Subject: Re: RRV Fiscal Impact study

The only updates I am aware of were to finalize the "Gap" information.
The final version will be on the website.

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...."
S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Eric Young <epyoung1@outlook.com>
Sent: Friday, June 26, 2026 10:33 AM
To: Lori Hunter <lhunter@valleycountyid.gov>; Cynda Herrick <cherrick@valleycountyid.gov>
Subject: Re: RRV Fiscal Impact study

Good Morning -

Thank you for putting the ppt which was presented at the workshop yesterday up on the website. My understanding is that this was available prior to the workshop. I am wondering if there will be additional updates based on the questions and feedback the commissioners provided at today's meeting.

Thank you,
Eric

From: Lori Hunter <lhunter@valleycountyid.gov>
Sent: Thursday, June 25, 2026 1:53 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>; Eric Young <epyoung1@outlook.com>
Subject: Re: RRV Fiscal Impact study

See attached.

They are also on the website page for Red Ridge Village: https://www.co.valley.id.us/departments/PlanningZoning/RedRidgeVillage
Scroll down towards the bottom for Work Session on 6-25-2026

Lori Hunter
Valley County Planning & Zoning Planner II
208-382-7115
700 South Main Street • P.O. Box 1350
Cascade, ID 83611

S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Cynda Herrick <cherrick@valleycountyid.gov>
Sent: Thursday, June 25, 2026 1:37 PM
To: Eric Young <epyoung1@outlook.com>
Cc: Lori Hunter <lhunter@valleycountyid.gov>
Subject: Re: RRV Fiscal Impact study

Hello,

Any updated documents are on the website. Or, Lori can email them to you, so we are not duplicating efforts.

Your comments will be added to the record.

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...."

S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Eric Young <epyoung1@outlook.com>
Sent: Thursday, June 25, 2026 1:04 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Cc: Lori Hunter <lhunter@valleycountyid.gov>
Subject: RRV Fiscal Impact study

Hello Cynda -

The RRV Fiscal Impact study summary ppt was helpful. Will you please confirm if there will be updates to this fiscal impact study based on today's discussion? My uptake from today's workshop is that this study needs refinement and improvements. Please see below.

Also, is there a more detailed document providing more information on the assumptions on what went into this data? For example, assumed home/condo values, appreciations rates, etc., etc.

Will you please pass the following message onto the VC P&Z Commissioners?

Thanks
Eric Young

Dear P&Z Commissioners -

The June 25th RRV fiscal impact study is, in my opinion, insufficient to accurately calculate the development's necessary impact fees and long-term legal requirements. Below are two items I recommend be included:

1. This study does not include the on-going impacts of temporary construction workers on the local infrastructure and services. Both the positive economic contributions and the negative strains on public resources must be quantified to establish equitable impact fees.

2. The modelling approach is an idealized, best-case development timeline. Valley County residential construction history demonstrates that large community construction projects frequently experience prolonged delays, and some projects have gone bankrupt. The study must include moderate (realistic) and conservative (worst-case) timeline models to protect public finances.

Addressing these two issues and others and provided these results in an updated impact study is vital to protect Valley County taxpayers from absorbing unforeseen infrastructure costs.

Sincerely,
Eric Young

Outlook

Fw: Attached: March 31 Work Session Letter for VC P&Z Commissioners

From Cynda Herrick <cherrick@valleycountyid.gov>
Date Wed 4/1/2026 7:05 AM
To Lori Hunter <lhunter@valleycountyid.gov>

1 attachment (590 KB)
March 31 2026 Work Session PUD RRV Hurd Letter to VC P&Z Commissioners.docx.pdf;

Please see attached; was a request to forward directly to PZ.

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: Rebecca Hurd <rhurd18@gmail.com>
Sent: Monday, March 30, 2026 2:38 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Cc: Scott Hurd <hurd0007@gmail.com>
Subject: Attached: March 31 Work Session Letter for VC P&Z Commissioners

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.

Hello Cynda,

We've reviewed the agenda you provided for the Valley County P&Z Commissioners' March 31 Work Session.

Based on what is and is not on the agenda, we have written the attached letter to the P&Z Commissioners.

Please forward this email and the attachment to the P&Z Commissioners today, and reply to confirm when this action is complete.

Thank you,
Rebecca & Scott Hurd

To: Valley County Planning and Zoning Commissioners
From: Rebecca and Scott Hurd, McCall
Date: March 30, 2026
Re: March 31, 2026 Work Session, PUD 26-001 – Red Ridge Village

Red Ridge Village Is Not a PUD. Proceeding as One Is Premature.

The March 31, 2026 work session agenda dives right into Idaho Code 67-6512, a procedural vehicle inside the PUD process. It includes development agreements, mitigation, proportional share, agency identification. It is a framework for processing RRV as a PUD.

We ask the Commission to pause before going further.

These are the right tools for the right project. RRV is not that project because RRV is not a PUD.

I. The Threshold Question the Agenda Does Not Ask

Before the Commission discusses conditions, mitigation criteria, or agency lists, it must address a question the March 31 work session's agenda skips entirely: is RRV a PUD at all?

By proceeding directly into a presentation of Idaho Code 67-6512 development agreements, mitigation of impacts and proportional share, the Commission implicitly accepts that RRV is a valid PUD to be approved with the right strings attached. That acceptance is premature — and every step taken at the March 31 work session toward designing those conditions makes it harder to later conclude the project should never have been processed as a PUD.

Valley County's PUD ordinance was designed for projects that cluster buildings to create open space. Idaho Code §67-6515 — the state's entire PUD statute — is four sentences written in 1975 for that same purpose. Neither was written to authorize a self-governing community of 1,800 people with private water, sewer, roads, and fire funding governed by an HOA. DF Development's own application describes RRV as "the front door to more than 30,000 acres of pristine terrain in Valley and Adams counties." A PUD permit is not a door to a two-county development. It is a site design tool.

If the Commission concludes that RRV is not appropriately processed as a PUD, the Commission's role is clear: deny the application as filed, without prejudice, and refer the matter to the Board of County Commissioners with a recommendation to create a regulatory framework adequate to what is actually being proposed — whether a large-scale PUD category, a planned community ordinance, or an interim moratorium under Idaho Code 67-6524 while that framework is built. The Commission cannot create that framework, only the Board can. But the Commission can and should put on the record at the March 31 work session that no adequate category currently exists, and that proceeding to design conditions for an application that may not belong in this category at all is premature.

II. The PUD History Review Will Prove the Point

The agenda includes a review of every PUD Valley County has approved: Jug Mountain Ranch, Meadows at West Mountain, Tamarack, Garnet Valley, MacGregor Townsite. We ask the Commission to hold one question in mind during that review:

> *Does any prior Valley County PUD propose 722 residential units, a 50,000 sq. ft. commercial village center, 1,800 residents, 8,071 daily vehicle trips, and its own private water, sewer, road, and fire funding systems?*

The answer is no. Not one comes close. That is not a coincidence. Valley County's PUD ordinance — adopted in 2010, amended once in 2011 to loosen setbacks — was never amended to address scale, population, or infrastructure governance. The history review is the Commission's own evidence that RRV does not belong in this category.

III. A Note on Idaho 67-6512 and the Current Record

Should the Commission proceed to evaluate RRV as a PUD, note that Idaho Code 67-6515 routes all PUD applications through Idaho Code's 67-6512's special use permit standards. Three provisions bear directly on this application. Idaho Code's 67-6512(a) requires a finding that political subdivisions — fire districts, road districts, EMS, schools, and the City of McCall — have the ability to provide services for the proposed use. None have committed to serve RRV, and McCall Fire & EMS and Donnelly Rural Fire Protection District have stated on the record they cannot without additional funded capital improvements. Idaho Code 67-6512(e) authorizes the Commission to require studies of social, economic, fiscal, and environmental effects before granting — none of which has DF Development provided. Idaho Code 67-6512(d)(8) requires mitigation conditions for service delivery impacts, which cannot be drafted without the completed studies that do not exist.

IV. A Note on Development Agreements and Proportional Share

If the March 31 work session is an educational introduction to these tools, note that development agreements and proportional share analysis are useful instruments — but only within an adequate regulatory framework. A development agreement cannot create fire service capacity that does not exist, secure water rights that are not held, or substitute for the infrastructure governance framework Valley County's PUD ordinance lacks. A proportional share calculation requires a completed baseline – which DF Development has not provided.

V. Valley County Is Being Asked to Approve the Front Door to a Two-County Development

Before the Commission identifies agencies, groups them, and sets mitigation criteria, it should address what DF Development's own application says about the scope of this project:

> *"Red Ridge Village is envisioned as the front door to more than 30,000 acres of pristine terrain in Valley and Adams counties." — RRV Concept Application*

DF Development is Adams County's largest private landowner — 60,930 acres across 194 parcels. DF's own original concept application noted that approximately 4,000 additional homes could be built on Adams County lands, which contain 28,700 of the 30,920 contiguous acres. Development of that land, per DF's own representative, would not occur until Red Ridge Village is substantially complete — in 15 to 20 years. Adams County's P&Z Director confirmed in November 2024 that preliminary talks with DF have occurred, though no application has been submitted.

The traffic study counts only RRV-generated trips. It contains no analysis of cumulative traffic from future Adams County development funneled through the same rural road network. The wildlife baseline does not exist for RRV, let alone for the broader corridor. No agency list, mitigation framework, or development agreement assembled today addresses what the application says is coming next.

The Commission should require, before any further work session proceeds, that DF Development fully disclose its development intentions for the Adams County corridor — phasing plans, infrastructure plans, access roads, and population projections. Without that disclosure, no study, condition, or agreement assembled for RRV alone can be considered complete.

VI. The Paths Forward

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1. Deny the PUD application as filed — this is not a PUD. The Commission should find on the record that RRV does not qualify as a PUD under Valley County's ordinance or Idaho Code 67-6515, and deny the application without prejudice. This is not a denial of the project. It is a denial of the wrong application category. The next steps that follow from that finding are:

a. Refer to the Board of County Commissioners with a recommendation to create a regulatory framework adequate to what is actually being proposed — a large-scale PUD category, a planned community ordinance, or both. Bonner County and Ada County have done exactly this under the same Idaho statutes that govern Valley County.

b. The Board may adopt an interim moratorium under Idaho Code 67-6524 on PUD applications above a defined scale threshold while that framework is built — up to one calendar year. The 2025 Comprehensive Plan update contains no policies on large-scale PUD development. That absent component can be initiated by Commission motion at the March 31 work session. The Board must separately find and state in writing that an imminent peril to public health, safety, or welfare requires a moratorium — a finding the current RRV record supports independently.

c. **DF Development may reapply** under the new framework once it exists, with required studies complete, fire service secured, and Adams County development plans fully disclosed. Reapplication does not guarantee approval.

2. If the Commission proceeds as a PUD: resolve the Idaho 67-6512(a) threshold first. Before designing conditions or proportional share obligations, the Commission must formally address whether it can make the service-capacity finding Idaho 67-6512(a) requires — that fire districts, road districts, EMS, schools, and the City of McCall have the ability to provide services for this use. On the current record, it cannot. That finding is not a condition to attach after approval. It is a statutory prerequisite to approval. If the Commission cannot make it, everything that follows on the March 31 work session's agenda is premature.

3. Require disclosure of Adams County plans before any further review. The Commission cannot evaluate the front door without knowing what it opens onto. DF's own application identifies approximately 4,000 additional homes for Adams County lands. No traffic study, environmental analysis, or mitigation framework assembled for RRV alone can be considered complete without that disclosure.

4. Require completion of studies under Idaho 67-6512(e) before setting any mitigation conditions or proportional share obligations. Conditions built on an incomplete record are unenforceable and expose Valley County to legal liability.

Other Idaho counties have already faced this problem. Bonner County created a "Large Scale" PUD category. Ada County built a separate Planned Community framework with its own comprehensive plan and zoning ordinance for each project. Teton County adopted an emergency moratorium when its framework was overwhelmed — and ultimately eliminated PUDs from its code entirely. All acted under the same Idaho statutes that govern Valley County.

The Commission has both the authority and the obligation to hold this line — not against development, but against the wrong process for the wrong project in the wrong place.

Outlook

Re: Fw: Action Requested for Monday, April 20: Forward email and attachments to P&Z Commissioners

From Cynda Herrick <cherrick@valleycountyid.gov>
Date Wed 6/17/2026 9:37 AM
To Rebecca Hurd <rhurd18@gmail.com>
Cc Scott Hurd <hurd0007@gmail.com>; Valley County Commissioners <commissioners@valleycountyid.gov>; Lori Hunter <lhunter@valleycountyid.gov>

Hello,

My response is succinct and is not a legal opinion since I am not an attorney. My response is based on Valley County Code, Idaho Statutes, and years of experience processing many Planned Unit Developments and other land use applications.

The questions you pose are as follows:

> 1. The specific legal authority relied on to exclude public comment from these work sessions, given that they are open meetings; and
> 2. Whether the P&Z Commission would consider allowing brief public comment or a Q&A opportunity in future work sessions on this application, given DF Development's continued direct access to the Commission during this period.

The Valley County P&Z Commission (PZ) is a quasi-judicial body. The PZ makes decisions in a way that is similar to a court—but without being a court. When a commission is acting in this role, the process is more formal than a typical public meeting and has notice like a public hearing; evidence for the record including expert testimony and public comment; is less "free'form" then legislative issues; need to avoid bias or conflicts; and, have a clean record.

The PZ holds an initial public hearing to hear concerns and considerations from the public and agencies. Then, if necessary, they seek evidence and information from agencies, etc. Work sessions are where they can obtain the information and seek a clear understanding. A **public meeting** is any scheduled gathering of a governing body—like a city council, county commission, or school board—where official business is discussed or decided. Under Idaho's Open Meeting Law, these meetings must generally be open to the public, with notice provided in advance. However, the public usually does not get a guaranteed chance to formally speak. Attendance and observation are the main rights. A **public hearing**, on the other hand, is a specific type of meeting (or a segment within a meeting) that is focused on collecting public input on a particular issue. This might be a zoning change, a budget, a permit, or a policy decision. In a public hearing, the government body is specifically required to allow members of the public to comment before a decision is made. A helpful way to think about it is that all public hearings happen within the framework of public meetings, but not all public meetings include a public hearing.

Valley County PZ has always had the goal of maintaining a clean record that is processed through manageable, well-noticed public meetings and hearings. The PZ has the right and obligation to thoroughly understand the application and laws/regulations that should guide their decision. This is

done in work sessions, when a complex application is presented. When the PZ has questions they seek answers in work sessions so they understand the information in the application.

The following are some excerpts from Valley County Code and Idaho Statutes that apply to the process and information gathering tactics of Valley County PZ:

9-5H-7: COMMISSION AND PUBLIC HEARING:

C. Application Tabled: The commission may table the application to a future specified date when:

1. Testimony during the public hearing provides conflicting information.
2. When new information or questions are raised that, in the opinion of the commission, should be studied by the administrator or staff.
3. When a legal opinion or counsel is needed.
4. When additional information is needed from the applicant.

9-2-1.B. 2. Ex Parte Contact: Any action of the commission in applying the general rules or policies to specific individuals or sites is quasi-judicial, which creates a higher standard of expected conduct. Whenever quasi-judicial issues are presented, both the proponents and opponents are entitled to know of any information presented by the other side. Therefore, the decision must be based only upon the evidence and testimony presented at the formal public hearing. If any information has been presented to a member ex parte, that information should be placed on the record at the hearing.

Idaho Code 67-6507. The planning process and related powers of the commission. As part of the planning process, a planning or zoning commission shall provide for citizen meetings, hearings, surveys, or other methods, to obtain advice on the planning process, plan, and implementation. **The commission may also conduct informational meetings and consult with public officials and agencies, public utility companies, and civic, educational, professional, or other organizations**. As part of the planning process, the commission shall endeavor to promote a public interest in and understanding of the commission's activities.

So, the PZ held a public hearing and heard from concerned citizens and the applicant. They determined they needed additional information and have sought the answers to the questions through a series of public meetings with agencies and hired professionals. The PZ will then conduct another public hearing at which time all of the information gathered will be inserted into the record and there will be another opportunity for public testimony.

Your correspondence will be placed in the record.

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 **T**ransparent **A**ccountable **R**esponsive

From: Rebecca Hurd <rhurd18@gmail.com>
Sent: Tuesday, June 16, 2026 6:33 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Cc: Scott Hurd <hurd0007@gmail.com>; Valley County Commissioners <commissioners@valleycountyid.gov>; Lori Hunter <lhunter@valleycountyid.gov>
Subject: Re: Fw: Action Requested for Monday, April 20: Forward email and attachments to P&Z Commissioners

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.

Cynda,

Thank you for explaining the County's process for correspondence on site-specific applications. We don't take issue with routing written correspondence through the Staff Report rather than directly to individual Commissioners — that keeps the record clear and avoids one-sided private communication with decision-makers outside the open process.

We do want to follow up on a related point that isn't addressed by the same rationale.

You noted the County doesn't want to create ex parte contact or the appearance of an open meeting law violation. But ex parte contact, by definition, means private communication that happens outside the open, recorded process. The public has been able to attend the Red Ridge Village PUD 26-001 work sessions on March 31, April 21, May 21, and the upcoming June 25 — though not permitted to speak at any of them. Because these are open, noticed, and minuted meetings, DF Development's representatives engaging in direct dialogue with P&Z Commissioners there isn't ex parte contact — it's public participation that the public itself isn't permitted to engage in.

We'd like to understand the specific legal basis for that distinction. As we understand it, neither the Open Meeting Law nor the Local Land Use Planning Act prohibits a commission from allowing public comment during a work session — the statutory requirement to take public testimony attaches to the noticed public hearing, but that's a minimum requirement, not a ceiling on what the County is permitted to allow elsewhere. If that's correct, the decision to let DF Development's representatives speak and respond to the P&Z Commissioners' questions in these sessions, while the public can only observe silently, appears to be a discretionary policy choice rather than a legal requirement.

Given that the public hearing record on Red Ridge Village has been closed since February 25, and substantive discussion involving DF Development's representatives has continued across three work sessions since then, with a fourth scheduled for June 25, we'd appreciate clarification on:

1. The specific legal authority relied on to exclude public comment from these work sessions, given that they are open meetings; and
2. Whether the P&Z Commission would consider allowing brief public comment or a Q&A opportunity in future work sessions on this application, given DF Development's continued direct access to the Commission during this period.

Please confirm this correspondence will be entered into the public record for the Red Ridge Village PUD 26-001 application, consistent with the process you've described. Given the process questions raised above, please also confirm it will be included in materials provided to the Commission in advance of the June 25 work session.

We appreciate your time and look forward to your response.

Thank you,

Rebecca & Scott Hurd

On Tue, Jun 9, 2026 at 10:01 AM Cynda Herrick <cherrick@valleycountyid.gov> wrote:

Hello Ms. Hurd,

All correspondence concerning site specific applications will be presented to the Planning and Zoning Commission as part of a Staff Report prior to public hearings to maintain a clear structured process as outlined in the Valley County Code. We will not send emails to the P&Z Commission if it is correspondence related to a site specific application.

Legal counsel has confirmed implementation of this process. We do not want to cloud the process, create *exparte* contact, or give the appearance of violating the open meeting laws.

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...."

S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Rebecca Hurd <rhurd18@gmail.com>
Sent: Monday, June 8, 2026 7:59 PM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Cc: Scott Hurd <hurd0007@gmail.com>; Valley County Commissioners <commissioners@valleycountyid.gov>; Lori Hunter <lhunter@valleycountyid.gov>
Subject: Re: Fw: Action Requested for Monday, April 20: Forward email and attachments to P&Z Commissioners

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.

Cynda,

Thank you for confirming that you forwarded our email to the P&Z Commission.

However, we did not request your commentary — we requested that our email and attachments be forwarded as submitted. Your response raises a process concern we want the P&Z Commissioners and BOCC to be aware of: our communications to the P&Z Commission were forwarded with unsolicited staff commentary attached. That is not a neutral forwarding function. We request that going forward, our correspondence be forwarded to Commissioners as submitted, without staff commentary attached.

This is not the first process concern we have raised. The agenda for the March 31 work session

included 'History of PUD Processing in Valley County with Documentation.' When we asked for that documentation, you responded: 'Sorry I did not have time to put together the documentation, so nobody got any.' A noticed agenda item with no documentation to support it is itself a transparency problem.

Regarding your comparison of Red Ridge Village to past Valley County PUDs in your email — the record does not support it. Based on the PUD history you presented orally at the March 31, 2026 work session, the prior Valley County PUDs are as follows:

- Jug Mountain Ranch (1997): 325 units max
- Meadows at West Mountain (2001): approved for 381 units, currently 229 built
- Garnet Valley (2023): 316 units
- MacGregor Townsite: 335 units
- Bella Reve: never developed, 698 units (expired)
- Gold Fork Bay: never developed, reduced to a smaller PUD after Supreme Court
- Tamarack/WestRock (1998): built out to 700–800 units of a total ~2,100 approved

RRV proposes 722 units, approximately 1,800 residents, 250 condos/nightly rentals, 50,000 square feet of commercial space, generating at least 8,071 daily vehicle trips — a project that would be larger than Donnelly and approach the size of Cascade itself. No prior Valley County PUD has come close to this combination of scale, complexity, and impact on county services and infrastructure.

As for Tamarack/WestRock specifically: that project began in 1998, before Valley County's current PUD ordinance was in place, making it a poor process precedent.

We also want to formally document the following for the record:

At the April 21, 2026 work session, DF Development's representatives Christine Richman and Hallie Adams, and P&Z Commissioner Brad Mabe participated remotely via Microsoft Teams. We have made multiple formal requests — on the record and in writing — for the public to be offered the same remote participation option for public hearings. Those requests have been denied or ignored. It is unacceptable that the applicant, whose project is under active review, has been granted remote access that the public has been explicitly denied. This is a fundamental equity issue and we request that the BOCC and P&Z Commissioners address it immediately.

We reiterate our request that remote testimony — at minimum by phone — be made available to the public at all future Valley County BOCC and P&Z public hearings, including the RRV PUD.

We request that this email stream is forwarded in its entirely to the P&Z Commission.

We request that this email and all prior correspondence be entered into the project file for PUD 26-001, Red Ridge Village Concept Application.

Rebecca & Scott Hurd

On Tue, Apr 21, 2026 at 1:53 PM Cynda Herrick <cherrick@valleycountyid.gov> wrote:

> Hello,

This email stream will be forwarded to the P&Z Commission.

The Valley County PUD process has been used approximately seven times that I can recall and was personally involved with processing; I was the P&Z Administrator for six of the PUDs. It has gone to the Idaho Supreme Court on two separate occasions; Valley County prevailed on both. The Tamarack PUD was much larger and had more idiosyncrasies than the Red Ridge PUD that we are currently reviewing.

The P&Z Commission has set three work session to gather information and data for an informed decision on the Red Ridge Village PUD. Prior to making their informed decision, another fully noticed public hearing will occur. The public will have a chance to comment on all information obtained in the three work sessions. I expect there will be many more work sessions throughout the review process. When we reviewed Tamarack there were well over 200 meetings; however, we have a lot more experience now.

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...."

S*ervice* **T***ransparent* **A***ccountable* **R***esponsive*

From: Rebecca Hurd <rhurd18@gmail.com>
Sent: Sunday, April 19, 2026 9:43 AM
To: Cynda Herrick <cherrick@valleycountyid.gov>
Cc: Valley County Commissioners <commissioners@valleycountyid.gov>; Scott Hurd <hurd0007@gmail.com>
Subject: Action Requested for Monday, April 20: Forward email and attachments to P&Z Commissioners

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.

Hello Cynda,

Please forward this email, in its entirety, and the two attached PDF documents to the P&Z Commissioners by ***end of day on Monday, April 20.***

Given that the attached documents, one of which is The Star News Viewpoint for the April 16, and this email include concerns related to the P&Z Commissioners' Red Ridge Village PUD work session on April 21, it is important for them to read and consider our concerns in advance of that meeting.

Please reply to confirm your receipt, to provide a copy of the entire email that you sent to P&Z (with email addresses redacted), and that the above is completed.

Dear Valley County P&Z Commissioners,

We request that you read and consider the issues we raise in the attached Viewpoint concerning the RRV PUD conception application process.

In addition, we have one more:

The Agenda for the June 25, 2026 meeting posted on the VC dashboard states that "Public testimony will not be taken."

At the March 31 work session, it was stated that June 25 will allow public comment. If you do not change that, you will have **no public comment at four meetings** where many decisions have been/will be made regarding RRV PUD: March 31, April 21, May 21, and June 25.

We request that you change the agenda for May 21 and June 25, and any subsequent meetings, to allow and encourage public testimony and written comments.

We continue to request that you make a formal recommendation to the BOCC to offer remote testimony at all public hearings. At a minimum, phone testimony can be offered right now, as it has been before for Valley County public hearings.

We request that this letter be entered into the project file for PUD 26-001, Red Ridge Village Concept Application, and that it be made available to decision-makers in connection with any further proceedings on this application, including review by the Board of County Commissioners.

Thank you,
Rebecca & Scott Hurd

Viewpoint
The Star News
April 16, 2026

Red Ridge Village PUD: The Process Is The Problem

At the Valley County P&Z Commission's March 31 work session on the Red Ridge Village (RRV) PUD, Valley County's prosecuting attorney stated clearly: mitigation must be based on studies, the Commission can require those studies first, and decisions must be grounded in evidence of record.

At that same work session, P&Z Commissioners sought guidance from the developer, DF Development (DF), on what the process should require. A developer should not be guiding the process that evaluates its own application. Seeking process guidance from the applicant signals that Valley County's framework is not built for a project of this scale.

The March 31 agenda items included: identify impacted agencies, group them, identify mitigation criteria — all before the underlying studies exist. The P&Z Commission directed DF to conduct that agency outreach and compile the responses, rather than having the county do so independently. Twelve of the agencies on that list already submitted reports for the February 25 public hearing — the vast majority flagged missing data or unresolved determinations, and none provided unconditional approval. At the work session, P&Z Commissioners also discussed whether impacts simply cannot be mitigated — whether the answer is already "no." That is the right question. But the specific questions DF will ask are not defined by any procedural ordinance or county document — leaving their content at DF's discretion.

On March 31, the P&Z Commissioners asked DF to write the Request for Proposal (RFP) for the required fiscal and economic impact analysis. A developer should not define the scope of an analysis that evaluates its own project. DF's representative stated they will need two weeks to proof and review the completed report before providing it to P&Z. Valley County must write the scope, and DF must bear the cost. That is what independent analysis means.

The deeper problem remains unchanged. Valley County has no regulatory framework adequate to a self-governing community of 1,800 people with private water, sewer, roads, and fire funding — anchored by a 50,000-square-foot commercial village center, larger than The Village at Tamarack Resort at 47,000 square feet. DF's application describes RRV as "the front door to more than 30,000 acres" stretching into Adams County, where DF has identified approximately 4,000 additional homes.

Ada, Bear Lake, and Bonner counties have developed ordinances specifically suited to large-scale proposals under the same Idaho statutes that govern Valley County. Instead, Valley County is applying a 2010 ordinance written for something far smaller.

Beyond the procedural concerns above, this process has shut out the public. The March 31 work session allowed no public testimony or written comment, and as of April 13, the materials distributed to P&Z Commissioners beforehand are not posted on the county's RRV PUD webpage, nor are the approved meeting minutes from the February 25 public hearing.

All of the following scheduled meetings have no public comment:

- April 21 — P&Z selects and recommends a fiscal and economic analysis consultant to the Board of County Commissioners (BOCC)
- April 27 — BOCC reviews and potentially approves that recommendation
- May 21 — P&Z work session to evaluate agency responses on mitigation

The first opportunity for public testimony or written comment will be at a June 25 public hearing, which will include the P&Z Commissioners' review of the fiscal and economic analysis report. Consider how many significant decisions will already be made by this point without any public input.

This process deserves public scrutiny — and public participation. We encourage you to watch the March 31 work session recording on Valley County's YouTube channel, and judge the process for yourself. Write to Valley County P&Z Commissioners through P&Z staff at cherrick@valleycountyid.gov, and copy the Board of County Commissioners at commissioners@valleycountyid.gov, to share your concerns and questions. We recommend that you add the following request to the end of your letter: "I request that this letter be entered into the project file for PUD 26-001, Red Ridge Village Concept Application, and that it be made available to decision-makers in connection with any further proceedings on this application, including review by the Board of County Commissioners."

Note: If you ask the P&Z Commissioners specific questions in your letter, do not expect to receive an email with their responses unless you submit a public records request. That is the process we have been told to follow.

Valley County is navigating a project of unprecedented scale — without a defined process, the necessary regulatory tools, or meaningful public participation. We will keep raising these concerns. We hope our Adams County and Valley County neighbors will join us.

Rebecca & Scott Hurd, McCall

Valley County Planning and Zoning Commission

PO Box 1350 • 700 South Main Street
Cascade, ID 83611-1350

Phone: 208-382-7115
Email: cherrick@valleycountyid.gov

Ken Roberts, Chairman
Carrie Potter, Vice-Chair

Brad Mabe, Commissioner
Ben Oyarzo, Commissioner
Heidi Schneider, Commissioner

AGENDA

Valley County Planning and Zoning Commission
June 25, 2026
Valley County Court House – 219 N Main ST, Cascade, Idaho
WORK SESSION – 9:00 a.m.

You may view the hearing by going to www.co.valley.id.us and click on "Watch Meetings Live".
The item is an Action Item.

1. **OPEN**: Call to Order
2. **P.U.D 26-001 Red Ridge Village:** The Planning and Zoning Commission will hold a work session in order to discuss the P.U.D. The public is invited to attend. Public testimony will not be taken.

   - **Discussion Regarding Fiscal and Economic Impact Analyses**

Agenda subject to change.

Valley County adheres to ADA requirements. If anyone requires an accommodation, please contact our office prior to the meeting.

From: Rebecca Hurd <rhurd18@gmail.com>
Sent: Sunday, August 2, 2026 7:12 PM
To: Sherry Maupin <smaupin@valleycountyid.gov>; Katlin Caldwell <kcaldwell@valleycountyid.gov>; Neal Thompson <nthompson@valleycountyid.gov>
Cc: Scott Hurd <hurd0007@gmail.com>; Valley County Prosecuting Attorney <ValleyPA@valleycountyid.gov>
Subject: Request to Postpone August 27 Hearing — Procedural and Process Concerns in P.U.D. 26-001 (Red Ridge Village)

Dear Valley County Commissioners,

This letter documents five specific procedural and process concerns with the P&Z Commission's review of P.U.D. 26-001 (Red Ridge Village), and requests specific Board action before the August 27, 2026 public hearing.

We are writing regarding P.U.D. 26-001 (Red Ridge Village), currently continued to public hearing before the Planning & Zoning Commission on August 27, 2026. As we understand Valley County Code 7-2-7, Planning & Zoning review of this application is advisory, with final approval authority resting with the Board of County Commissioners. Given that authority, we are asking the Board to ensure that the process feeding into your eventual decision is fair before it proceeds further, and specifically to decline to act on any P&Z recommendation built on the process described below until the following procedural inequities are corrected. Several of these concerns have already been raised directly with the Board and the P&Z Commission in prior correspondence and testimony. We consolidated them here because they remain unresolved as the hearing date approaches.

1. Unequal Presentation Time

The applicant, DF Development, asked for and was given 90 minutes to present at the February 25, 2026 hearing, with additional time allotted for them to present again at the August 27 hearing. Individual public speakers are held to a strict 3-minute limit under VCC 9-5H-11, with no ability to yield or combine time. The party with the greatest resources and financial stake receives effectively unlimited time to shape the record, while every resident is capped regardless of how many substantive concerns they have.

2. Public Must Comment Before Seeing the Applicant's Materials or Staff's Analysis

The written comment deadline is August 19, 2026. The Planning & Zoning Director has confirmed by email that the staff report, which "will include attachments of information (applicant information/documents/agency information) that has been accumulated since the last public hearing" will not be posted until "either on August 20 or August 21, at the latest August 24." When asked what day DF Development's August 27 presentation would be posted, she replied that it would be posted when it is received from the applicant, with no deadline at all. Valley County Code does not appear to contain any provision requiring staff reports, applicant presentations, or other application materials to be posted by a particular deadline; VCC 9-5H-11(P) sets a 7-day deadline for the public's own written submittals, but no comparable deadline binds the County or the applicant to make their materials available in time for the public to use that same window meaningfully. This is not a violation of a specific rule so much as the absence of one — which is the same underlying problem described in Item 5 below. This is also not a hypothetical risk: at the February 25, 2026 hearing, DF Development's presentation was not posted for public access until the start of the hearing itself, and it included 13 slides responding directly to public letters and agency reports.

Written comments were due 8 days prior to that hearing, so neither the public nor affected agencies had any opportunity to review DF's rebuttal to their comments and letters in advance. Additionally, because DF's presentation was not made available in advance of that evening, the public had no meaningful opportunity to prepare a response in person either. VCC 9-5H-11(K) provides that if new information is presented by the applicant, the public shall have a chance to address that specific information — but withholding rebuttal content until the hearing begins makes that safeguard largely theoretical.

3. Inconsistent and Improper Notice Language

The published newspaper notice states that written comments longer than one page must be submitted at least 7 days prior to the hearing, consistent with VCC 9-5H-11(P)'s 7-day minimum for written submittals. However, the Public Hearing Notice's deadline of August 19, 2026 at 5:00 PM is actually 8 days before the August 27 hearing, not 7. The notice's own stated rule and its own stated deadline do not match on their face, even though the actual deadline given exceeds the code's minimum. This kind of internal inconsistency leaves the public uncertain about which figure to rely on. Separately, the sentence stating "If you do not submit a comment, we will assume you have no objections." does not appear in the published newspaper notice at all — only in the Public Hearing Notice. The public is receiving materially different representations of the comment process depending on which version of the notice they see. As to that sentence itself: we have testified and submitted written objections to it because silence does not mean consent, and requested its removal on October 23, 2025, and again in February 17, 2026. It remains in the August 27 public hearing notice.

4. No Remote Testimony Option for the Public

Public testimony must be delivered in person in Cascade, with no video or call-in option. By contrast, DF's representatives and Planning & Zoning Commissioners have participated remotely in RRV work sessions via the County's existing Microsoft Teams platform. More broadly, P&Z Commissioners Roberts and Mabe and Board of County Commissioner Caldwell have participated in public hearings via remote technology. We have submitted written requests and public hearing comment letters to the P&Z Commissioners and the Board of County Commissioners, specifically asking that a remote testimony option be extended to the public. That request has not been granted, even as the applicant and the Commission continue to use remote participation themselves throughout this process.

5. No County-Controlled Process for Scoping and Reviewing Studies on Large-Scale Developments

Items 1 through 4 describe asymmetries within an existing process. This fifth item is the absence of a process at all. Valley County has no ordinance or written standard specifying which technical studies are required for a PUD at this scale, or how those studies are to be scoped, procured, and reviewed. The Traffic Impact Study itself states that its study area "was defined based on conversations with the development team" — DF Development, not the county. The fiscal impact analysis was produced through an RFP that DF Development scoped, with proposals submitted to a DF Development email address, key valuation and phasing assumptions supplied by DF, and DF reviewing the draft before Valley County's P&Z Commissioners saw it; the RFP itself required the consultant to work "based on development assumptions provided by the Client" — the Client being DF Development. Both analyses show the effects: the fiscal model projects a surplus for McCall Fire that directly contradicts McCall Fire's own statement that it cannot serve this development without a new station, new apparatus, and a voter-approved levy override, and capital costs such as road mitigation and a new fire station are largely excluded from the model. Separately, at the end of each of the four most

recent RRV work sessions — sessions where DF Development was present and involved, and where the public was not permitted to comment — Commissioners have asked the Planning & Zoning Director what their next steps are because there is no documented framework or process.

Taken together, these are not isolated oversights. Each one benefits DF Development's ability to present its case and limits the public's ability to respond to it, and two of them — the remote testimony request and the notice language — persist despite repeated, specific requests already on record with the County. The notice itself is also internally inconsistent, leaving the public without a reliable way to determine its actual deadline or its actual rights. Underlying all of this is the absence of any county-controlled process for scoping and reviewing the technical studies a decision of this magnitude requires, which has allowed DF Development to shape the record from the outset.

Given the scale of this application — 722 units on 2,250 acres — we are asking the Board to use its final approval authority to ensure this process is corrected before it goes further. Specifically, we request that the Board:

- Direct that the August 27 hearing be postponed, or, at minimum, decline to act on any recommendation arising from it, until public comment deadlines are set only after staff's report and the applicant's materials are posted, with reasonable time to review them.
- Ensure a remote testimony option is made available to the public, consistent with the accommodation already used by both the applicant and the Commission throughout this process, and consistent with the public's repeated requests.
- Ensure the public notice is corrected — so that the stated comment deadline and the stated 7-day rule for longer comments are consistent, all versions of the notice are consistent with each other, and the presumption that silence equals no objection is removed.
- Commission an independent, county-controlled review of the existing Traffic Impact Study and fiscal impact analysis before this application proceeds further, given that both were scoped, sourced, and reviewed by the applicant prior to county or public review.
- Adopt a documented policy requiring independent scoping, vendor selection, and county control of required technical studies for PUDs and CUPs above a defined size or impact threshold, so that future applications of this scale are not left to the applicant to define.

We can provide documentation, including the referenced email correspondence with the P&Z Director, upon request. We are copying the Prosecuting Attorney's Office on this letter given the procedural gaps and inconsistencies it documents in the review of this application.

Given that the hearing is scheduled for August 27, we would appreciate receiving the Board's written response with its decision on these requests in advance of that date, so that we have adequate time to prepare accordingly.

We ask that the Board's response be entered into the official record for this application and be addressed at a scheduled Board meeting prior to August 27.

We appreciate the Board's attention to this and welcome the opportunity to discuss further.

Respectfully,
Rebecca & Scott Hurd
McCall

From: Brian Oakey <boakey@valleycountyid.gov>
Sent: Tuesday, August 11, 2026 4:37 PM
To: Rebecca Hurd <rhurd18@gmail.com>
Cc: Scott Hurd <hurd0007@gmail.com>; Cynda Herrick <cherrick@valleycountyid.gov>
Subject: Red Ridge Village Public Hearing

On August 2nd, the Valley County Board of Commissioners received your email regarding the upcoming Red Ridge Village PUD public hearing scheduled for August 27, 2026. The email and its attachments constitute procedural objections seeking the Board's intervention in the Planning and Zoning Commission's hearing process. I have advised the Board of the proper procedure and am responding on their behalf. Although the board holds ultimate authority over land use decisions in Valley County it still must follow the process mandated by the Local Land Use Planning Act and Valley County Ordinances. That authority should only be exercised at the appropriate procedural stage. In this case, when the recommendation from the P&Z Commission is complete and the application is properly before the Board. Intervening now, as you have requested, is not appropriate. Because the Red Ridge application is not properly before the board they should not be considering or responding to the substance of your email.

The appropriate forum for your objections is the Planning and Zoning administrative hearing itself. Commissioning a parallel independent review by the Board of County Commissioners would introduce a delay without a legal basis and could itself be challenged as an irregular departure from the established review process. Your email and attachments will be included in the written record. You are also welcome to lodge your concerns verbally at the upcoming public hearing if you feel the need to supplement the information you have provided in writing. For your information, the proper pathway for a party with a complaint about procedural irregularities in a pending commission proceeding is: (1) raise the irregularity at the commission hearing; (2) if the commission acts adversely, formally appeal to the board; (3) if the board acts adversely, seek reconsideration within fourteen days; and (4) seek judicial review within twenty-eight days after exhausting all administrative remedies.

Following the process I have summarized above ensures that a proper record is developed and that issues, including procedural complaints, are handled in a transparent and documented way.

Sincerely,

Brian Oakey
Valley County Prosecutor

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

September 13, 2026

Valley County Planning & Zoning Commissioners
c/o Cynda Herrick
219 N. Main Street
Cascade, Idaho 83611

Subject: Corrections needed to August 27, 2026 Red Ridge Village Testimony (P.U.D. 26-001)

I am submitting this letter to correct several technical misstatements made during the August 27, 2026 Red Ridge Village presentation. Accurate information is essential for land-use decisions, particularly when wastewater disposal may affect Lake Cascade...an already impaired waterbody under Idaho Code and currently in bloom posted by IDEQ as "Health Alert" risk level.

1. Mischaracterization of Class A Recycled Water

Mr. Chuck Brockway stated that "Recycled water is Class A drinking water quality."
This is incorrect under Idaho's reclaimed-water rules.

- Class A reclaimed water is not drinking water under IDAPA 58.01.08.
- The Class A standard (IDAPA 58.01.17) is designed for safe reuse, not potable use.
- Class A water still contains measurable nitrogen and phosphorus, as well as other chemicals such as pharmaceuticals, etc.

Even full Advanced Wastewater Treatment systems that approach potable quality are not permitted as drinking water in Idaho. Presenting Class A effluent as "drinking water quality" is inconsistent with Idaho DEQ regulations and risks misleading County decision-makers.

2. Misstatement Regarding Rapid Infiltration as a Common Disposal Method

Mr. Brockway also stated that rapid infiltration (RI) is a common wastewater-disposal method. This is not accurate for Valley County. Most Valley County systems rely on lined winter storage ponds with slow-rate land application.

The only RI basins constructed locally that we know of (NLRWSD expansion area) have never been used and have remained idle for decades.

Valley County's coarse soils, shallow groundwater, and proximity to nutrient-sensitive waters make RI high-risk and difficult to justify under Idaho's antidegradation requirements.

Characterizing RI as "common" in Valley County is factually incorrect.

3. Why These Misstatements Matter Under Idaho Law

Idaho Statute 39-3610 requires that new or expanded discharges cannot further degrade impaired waters. Lake Cascade is officially listed by the State and EPA as impaired for nutrient pollution, affecting designated beneficial uses:

- Cold-water aquatic life support
- Primary and secondary contact recreation
- Agriculture supply
- Domestic Water Supply (Downstream/Source)

Any new wastewater system must demonstrate that it will not increase nutrient loading to Lake Cascade or its tributaries. RI systems require defensible hydrogeologic modeling showing that nitrogen and phosphorus will not migrate to surface waters. This is difficult to demonstrate in Valley County's heterogeneous hydrogeologic conditions which increase uncertainty and risks.

4. Regulatory Recommendation

Consistent with Idaho DEQ guidance and Valley County precedent, rapid infiltration is not appropriate for this project in our opinion. If Red Ridge Village is approved, the wastewater system should be required to use:

A properly engineered, lined winter storage pond, sized for hydraulic and nutrient-management requirements, with slow-rate land application as the disposal method.

This approach aligns with DEQ expectations and Idaho's antidegradation protections for Lake Cascade.

Friends of Lake Cascade



Lenard D. Long,
A Founding Member of Friends of Lake Cascade
Retired Civil Engineer

Cc: Valley Soil and Water Conservation District