



# North Ada County Foothills Association

One voice. One goal. One plan.

August 17, 2008

Board of County Commissioners  
200 West Front Street  
Boise, Idaho 83702  
Attn: Bruce Wall, Development Services

RE: JMM Dry Creek, **LLC 200600219-CPA** (text amendment), **-ZC** (zoning ordinance map amendment), **-DA** (development agreement), **-ZOA** (zoning ordinance text amendment) and **200600219 S-HD-FP**, Jeker's Place Preliminary Plat

Dear Commissioners:

The North Ada County Foothills Association (NACFA) strongly recommends denial of the above-referenced applications, consistent with the denial recommendation of the Ada County Planning and Zoning Commission on June 19, 2008.

NACFA typically comments only on proposals within our area of interest, west of SH 55 and east of SH16. However, the magnitude of adverse impacts generated by this development, particularly on the transportation system, will greatly affect the North Foothills and the City of Eagle. Furthermore, we find the application lacking in concrete assurances for preservation of wildlife habitat and unresponsive to priorities for open space/recreation/trails connectivity.

As the BOCC is well aware, the North Foothills, west of SH 55, is the focus of intense development interest, with substantial development activity already underway or pending (e.g., SunCor and M3). Much of this development is contemplated to use the state highways as major transportation corridors. The intensity of development *east* of SH55, such as that proposed by JMM Dry Creek, contributes to the total traffic load on SH55, which carries 6000-9000 vehicles/day at most in its present configuration.

In this regard, we urge your careful review of COMPASS letter of May 14, 2008, which details the full traffic context of development activity on both sides of SH55, as well as the impacts generated by this application on traffic congestion in the area, and lays bare the complete lack of funding for critical improvements to this portion of the state highway system.

While the developers, including the present applicant and the broader “Highway 55 consortium”, speak of commitment to mitigating traffic impacts from development in the foothills area, their commitment to implementing actual improvements to the highway system focuses on the immediate local area, not on the major improvements that will be necessary at the regional level. (That is, the Three Cities crossing and solutions to already significant capacity/congestion issues (SH 44, Eagle Road/SH 55 south of Highway 44, etc.) are on the far horizon, with concrete specifics nonexistent.)

Unless and until firm plans/commitments for funding and implementing these regional improvements are assured, all the localized improvements in the world will not mitigate the impact of this foothills development on the North County community and into the broader Treasure Valley.

Specific to the Dry Creek proposal, the City of Boise has expressed legitimate concern that commuter traffic from the proposed development will spill on to 36<sup>th</sup> St., Hill Road and Harrison Blvd. due to the virtual certainty that SH55 improvements will not be realized for many years into the future. Similarly, traffic west of the site, principally on east/west connections--Beacon Light Road, State St. and SH44--is certain to be further congested, at least in the near and mid-term, by residents of this development as they utilize local services and shopping areas.

Within the Dry Creek project itself, the traffic circulation system currently proposed, while perhaps most convenient for the applicant, equates to unnecessary impacts on neighboring rural residential properties. We recommend that the BOCC direct the applicant to reassess and modify the circulation system to eliminate this problem.

Most seriously in the context of regional recreation, the Dry Creek project as currently proposed eliminates any possibility of connectivity for equestrians from trails currently envisioned west of SH55 in the Brookside area and conceptually detailed in the Eagle Foothills Comp Plan amendment adopted in November 2007.

BOCC action on this aspect of the Dry Creek project will demonstrate the sincerity of future commitment we can expect for the recommendations of the County Open Space Task Force made public last April. It is our hope that the BOCC will use this application--the first test of the regional open space and recreation vision--to signal unequivocally that development applications incorporating Task Force recommendations will be supported, while those flouting the recommendations will be denied.

Similarly, the absence of an executed conservation easement for the 300 acres of offsite habitat recommended as adequate mitigation by the IDFG, to offset reductions to critical mule deer range, causes us great concern and argues as well for denial.

While Dry Creek Ranch may be some of the most suitable acreage in the broader foothills area for higher-density development, the application as currently constituted raises serious, unresolved issues with respect to:

- traffic load and transportation funding;
- unmitigated impacts on the local area (including especially existing, neighboring rural residential properties);
- regional open space, recreation and connectivity; and
- provision of wildlife habitat.

Until the applicant modifies the current proposal to address these problems, both throughout the site and specifically in the Jeker's Place plat, the proposal does not merit approval.

Thank you for your consideration of these issues.

Yours truly,

A handwritten signature in cursive script, appearing to read "Katherine Pennisi".

Katherine Pennisi  
Co-chair  
North Ada County Foothills Association

Copy:  
City of Eagle (Council Chair Guerber)  
COMPASS (Trainor)  
Dry Creek Rural Neighborhood Association (Chair Nona)