



Janna Berard <janna.berard@bonnercountyid.gov>

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**[EXT SENDER] RE: Agency Project Review Request - File AM0012-22**

1 message

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**Horsmon, Merritt** <merritt.horsmon@idfg.idaho.gov>  
To: Bonner County Planning Department <planning@bonnercountyid.gov>

Thu, Aug 25, 2022 at 1:00 PM

Hi Jenna,

Please accept the attached Idaho Department of Fish and Game comments.

Sorry for the delay.

Thank you,

**Merritt Horsmon**

Environmental Staff Biologist

Panhandle Region

2885 W. Kathleen Ave.

Coeur d'Alene, ID 83815

208.769.1414 office

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[merritt.horsmon@idfg.idaho.gov](mailto:merritt.horsmon@idfg.idaho.gov)



**From:** Bonner County Planning Department <[planning@bonnercountyid.gov](mailto:planning@bonnercountyid.gov)>

**Sent:** Friday, July 15, 2022 11:55 AM

**To:** Avista Copr - Jay West <[jay.west@avistacorp.com](mailto:jay.west@avistacorp.com)>; Avista Corp - Peggy George <[peggy.george@avistacorp.com](mailto:peggy.george@avistacorp.com)>; City of Dover <[cityclerk@cityofdoveridaho.org](mailto:cityclerk@cityofdoveridaho.org)>; City of Hope <[dovercitytreas@nctv.com](mailto:dovercitytreas@nctv.com)>; City of East Hope <[easthope.city@gmail.com](mailto:easthope.city@gmail.com)>; City of Oldtown <[cityofoldtown@hotmail.com](mailto:cityofoldtown@hotmail.com)>; City of Priest River <[lknoles@priestriver-id.gov](mailto:lknoles@priestriver-id.gov)>; Spirit Lake Fire Dept. <[chief@spiritlakefire.com](mailto:chief@spiritlakefire.com)>; City of Clark Fork <[city@clarkforkidaho.org](mailto:city@clarkforkidaho.org)>; City of Kootenai

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**Cc:** Swati Rastogi <swati.rastogi@bonnercountyid.gov>; Jacob Gabell <jake.gabell@bonnercountyid.gov>  
**Subject:** Agency Project Review Request - File AM0012-22


The above-named application has been submitted to the Bonner County Planning Department for processing.

Please review the application relative to your agency's area of expertise and include any recommended conditions of approval and supporting code sections. Please see attached for details.

Thank you,

**Jenna Crone, Hearing Coordinator**  
**Bonner County Planning Department**  
**208-265-1458 ext - 1277**

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 **BC\_AM0012-22\_BCPC.pdf**  
235K



**IDAHO DEPARTMENT OF FISH AND GAME**

PANHANDLE REGION  
2885 West Kathleen Avenue  
Coeur d'Alene, Idaho 83815

Brad Little / Governor  
Ed Schriever / Director

August 25, 2022

Bonner County Planning Commission  
1500 Highway 2, Suite 208  
Sandpoint, ID 83864

REFERENCE: AM0012-22 Text Amendment – Bonner County Planning Commission

Dear Bonner County Planning Commissioners:

We have reviewed the proposed Bonner County Comprehensive Plan revisions. The purpose of these comments is to assist the permitting authorities by providing technical information addressing potential effects on fish, wildlife, and habitat and how any adverse effects might be mitigated. Resident species of fish and wildlife are property of all Idaho citizens, and IDFG and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate and manage all fish and wildlife in Idaho (Idaho Code § 36-103(a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and suggestions.

In reviewing the proposed changes to the Bonner County Comprehensive Plan, Idaho Department of Fish and Game (IDFG) focused on the Land Use and Natural Resource sections specifically. IDFG often comments on proposals and applications regarding these two sections.

The Land Use section states that Bonner County's goal is to "balance and integrate its land use policies and proposed land use map with the components of the comprehensive plan to encourage the community to grow while retaining its rural character and protecting its unique natural resources." The following are IDFG recommendations for achieving the objectives in the land use section:

- Land use applications shall be reviewed against land use maps and designations, but also consider negative impacts to natural resources and to the rural character of Bonner County.
- Development standards and zoning codes should be designed to encourage preservation of open space, rural character, and wildlife habitat using one of the many methods available today; to include, but not be limited to, clustered development, planned open spaces, building envelopes, lot size limits, and conservation developments.
- Bonner County should consider all un-subdivided, unaltered, and un-fragmented large parcels as important wildlife habitat. As development increases, these larger unaltered parcels will become increasingly important for many species of wildlife. Additionally, retention of these lands will continue to protect the rural character and economy of the county.

*Keeping Idaho's Wildlife Heritage*

- It is important to note that much of the big game winter range occurs on low elevation private lands in and around the valley bottoms. Winter range habitat is critical to maintaining robust populations of big game species. IDFG is currently working on developing an updated critical habitat map for use within the Comprehensive Plan that includes big game winter range, and local distributions of ESA listed species and species of greatest conservation need as defined by the State Wildlife Action Plan (SWAP).
- All wetlands should be considered critical habitat. Wetlands provide wildlife habitat, flood attenuation, and help to improve water quality.
- Zoning maps should consider fish and wildlife habitat as one of the decision criteria.
- Protect water quality by creating stricter standards for development in close proximity to shorelines, springs, wetland areas, riverine and riparian areas. Do not allow variances to codes meant to protect water quality. Maintain and encourage native vegetation along shorelines to reduce erosion and maintain water quality and fish and wildlife habitat.
- IDFG recommends leaving the voluntary conservation easement verbiage currently included in the plan.
- IDFG recommends adding an objective with the goal of protecting public access to public lands for outdoor recreation including hunting, fishing and trapping.

In the Natural Resources section, the revised goal aligns with IDFG's strategic plan and State Wildlife Action Plan. The first objective states that "Bonner County's system of lakes and waterways is one of its greatest assets, and Bonner County will strive to preserve both the quality and quantity of its water resources." Currently, Bonner County has codes in place to protect water quality, but with continued building and growth, the quantity of water has become an issue. IDFG has concerns with additional wells and surface water withdrawals having negative effects on fish, wildlife and current residents of Bonner County. There are several minimum stream flow water rights held by the Idaho Water Resources Board within Bonner County that are not routinely being met. At least two of these are within Bull Trout critical habitat designated by the US Fish and Wildlife Service.

- Development standards and zoning codes should be designed to encourage preservation of open space and wildlife habitat using one of the many methods available today to include but not be limited to clustered development, planned open spaces, building envelopes, lot size limits, and conservation developments.
- Bonner County should consider all un-subdivided, unaltered, and un-fragmented large parcels as important wildlife habitat. As development increases, these larger unaltered parcels will become increasingly important for many species of wildlife. Additionally, retention of these lands will continue to protect the rural economy and character of the county.
- All wetlands should be considered as critical habitat. Wetlands provide wildlife habitat, flood attenuation, and help to improve water quality.
- Bonner County will recognize its critical and important wildlife habitat and create zoning districts and building standards to protect these areas and mitigate development impacts to these vital areas.

- IDFG recommends adding an objective for Bonner County to inform new residents of the potential challenges of living with wildlife and provide recommended mitigation measures on their website or within the plan.

Within the notes from the Commission discussion, it is mentioned that the county does not manage natural resources and that it not responsible for approving wells. While this is technically true, it is this type of justification that has exacerbated the unprecedented growth in Bonner County, often to the detriment of fish and wildlife, available habitat, and subsequently wildlife-based recreation in the county. Part of managing natural resources, particularly fish and wildlife, is maintaining habitat quality and quantity. While the county does not approve wells, there are no wells needed without a home to provide water to, and while the county is not responsible for managing wildlife, when zone changes and comprehensive plan amendments that lead to increased development are approved, it directly affects the quality and quantity of available wildlife habitat. The cumulative amount of development over the last few years has no doubt had an effect on both the carrying capacity and quality of habitat available in Bonner County. The reduction of wildlife and available habitat will affect Idahoans who enjoy wildlife and wildlife-based recreation.

In summary, our overall impression is that this process is being rushed, and more time should be taken to update the Comprehensive Plan. Additionally, we encourage more inclusion of the public in the update process, which will lead to a more thoughtful, desirable, and transparent process. IDFG appreciates the opportunity to participate with Bonner County on the Comprehensive Plan Update, Critical Habitat Map, and through the agency comment process. We will continue to partner, engage, and provide technical assistance that aligns with our Department’s mission and commission-approved wildlife action plans.

Thank you for the opportunity to comment.

Sincerely,

Carson Watkins  
Regional Supervisor

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