

August 12, 2022

Bonner County Planning Department and Planning Commission

These comments concern the GOALS, OBJECTIVES AND POLICIES: SUGGESTED UPDATES - 2022 process and document, as well as those items not selected for changes.

To propose a limited update to the Bonner County Comprehensive Plan, that only consists of changes to the Plan's goals, objectives and policies without updating the underlying data, is an exercise in futility. This is particularly true considering the tremendous growth the County has experienced since 2005 and the number of new issues that have arisen since then. In fact many of the Summary Notes From The Commission's Discussion sections concern these new issues and they consistently note a lack of current information and data. The 2005 version is well past the time that it should have been updated and to prolong that delay does not serve the public, those making requests or decision-makers well. The County should table this action and begin a thorough update of the Plan, starting with data gathering.

In addition, the truncated opportunities for public involvement are the antithesis of what proper long-range planning demands. Much better to spend excess time up front to educate, gather input, answer questions, vet the material and try to come to a consensus than to continue to slog through contentious hearings on individual development requests because no one has bought into the changes or is working with accurate, current information.

In reviewing the draft we are also concerned that there seems to be a lack of understanding about the purpose of goals, objectives and policies. Goals and objectives are an expression of the desires of the community, which requires sincere opportunities for public input. A goal is a general statement of a desired future. An objective is a measurable pursuit of that goal. Policies are operational actions that a community will undertake to meet the goals and objectives. If objectives are not measurable, and policies cannot be implemented by the County itself the plan is worthless.

The proposed goal "Bonner County shall keep current with county census data, population estimates and projections and shall use the data to analyze community needs and project impacts" is in conflict with the reality that that data is not present to inform meaningful discussion. The population section of the 2005 Plan is woefully out of date and fails to even address one very important element (as does the recently completed Sagle final draft sub-area plan), which is the significant influx and number of part-time residents as well as visitors. Their numbers impact the demand for services, the viability of businesses, employment opportunities and to a degree the lifestyle of full-time residents. I would estimate that around 50% of homes along the shorelines are part-time residences. How does that affect the community? What are the particular issues that arise from it? How do visitors benefit the area, or not? The plan is where these questions should be discussed, data provided and policies crafted to address them. It makes no sense that such a driver of the local economy is not addressed.

An example of a goal that cannot be implemented by the County is “Preserve the county's commitment to and ability to provide quality education to the current and future students of Bonner County.” The county does not provide education to the local students. It does provide public services to the schools and should solicit the districts’ input on development that may impact their ability to provide a quality education. The goal for this section should address those things within the County’s control.

The Economic Development section is missing a goal which expresses the County’s future vision of the local economy. The items listed under “Goals/Objectives” are for the most part objectives. However, how is the County going to measurably “Support small businesses such as markets, restaurants, recreational activities, campgrounds, and marinas that provide services which support resort residents and visitors in their local communities” and “Support local economic development by increasing support for outdoor recreation in Bonner County. Encourage and protect public access to public lands and water, campgrounds, and recreational areas.”? For the latter, the statement could be divided so that “Support local economic development by increasing support for outdoor recreation in Bonner County” is the objective and “Encourage and protect public access to public lands and water, campgrounds, and recreation areas” is the policy, with how the County encourages and protects added to it.

Economic Development Policy “Commercial uses may be conditionally permitted in areas not identified for such uses in the Comprehensive Plan if a critical review of the proposed use determines that with appropriate conditions the use will not adversely impact the surrounding area.” refers to “a critical review”. Is a critical review process defined in the County Code?

Since the County does not have full permitting or management authority on a variety of natural resources, that section should contain a policy in regards to the County working in cooperation with Idaho Departments of Water Resources and Lands, as well as the Panhandle Health District to accomplish your goal of “Protect, enhance and maintain the County’s natural resources such as air, water, forest, minerals, plants, animals for long-term benefits to the public.”

Under Public Services, Facilities and Utilities the last objective is a policy. Also in that section how will you encourage development in existing districts per “Bonner County will identify sewer and water service areas, and encourage development within the boundaries of existing sewer and water these areas.”? Will it be by zoning designations, Heath District standards or ....? The method should be noted in the policy so that it is measurable.

Recreation policy “Bonner County is encouraged to develop a waterways and park access program to preserve and develop access to public recreational lands and waterways. The program should include retaining access parcels that may be acquired from tax sales or private donations. As development of the area’s waterways continues, public access to public waterways is being eroded.” is not measurable. The County does it or does not. The last sentence of it is a finding, not policy.

In the Transportation section, Objectives 2, 3 and 5 are policies. This section has no mention of the need for coordination with IDT on development along the state highways that traverse the County and involvement in planning for their future expansion.

Housing Policy "Encourage development of a variety of housing options" should be an objective or should include how the County will encourage the development of a variety of housing options so that it is measurable.

This is not a policy - "Bonner County recognizes opportunities should be made for assisted living and group shelters because it is not just an urban housing function" as it is not actionable.

Considering the community-wide concerns regarding housing, this section is very weak, likely because there was no current data provided to the Commission.

In the Community Design section "Bonner County recognizes it has a number of historic neighborhoods developed over the past century and realizes the need for flexibility for older neighborhoods and historic settlements so that standards fit those unique neighborhoods." is not a policy. A policy would be to develop regulations that accomplish it.

"Bonner County recognizes it has a wealth of resort neighborhoods which require particularized design standards to address waterfront and mountaintop developments which may differ from standard design objectives." is also not an actionable policy. Creating design standards would be.

In the Agriculture section how does the County "Protect the rural character and agricultural heritage of Bonner County by retaining large and small scale commercial agriculture and hobby farms as viable uses."? Unless the County is going to acquire ag land or easements, it can only create zoning provisions (minimum lot sizes/densities) that keep the land in large parcels. Hobby farms and small scale ag are much more difficult for the County to protect, other than by acknowledging that those uses will be prioritized over residential uses in terms of allowing conditions that may be considered nuisances (noise, odors, operation of farm machinery) in areas of denser residential development. However, without updated information, there is no way of knowing just how much active commercial agriculture is actually still in the County and where.

"Bonner County recognizes that residential uses are permitted in Agricultural zoning districts" is not a policy since it is not actionable. Requiring notices on plats regarding the fact that a residential lot is in an agricultural area and subject to agricultural activities which take precedence would be a measurable action.

There are many good goals, objectives and policies in the draft, however by using the 2005 Plan as the basis, they do not address the development issues of most concern now and likely will not unburden the staff and Commission.

Bonner County processes an inordinate amount of requests for zoning changes, variances, conditional use permits and code amendments. This is a sign that the plan and implementing ordinances are out of date and do not reflect the needs and desires of the community. A well-crafted plan and ordinances that address current concerns should make the need for many of those applications minimal.

A full review and update of the 2005 Plan should be undertaken, starting with the staff and Commission determining which of the goals have been accomplished and if not, why not. Data needs to be updated and expanded to address issues that were not included in the Plan, the number and type of requests processed should be inventoried as well as current land uses. Public input should be solicited to determine additional items that should be included and priorities.

For example, several issues that have been repeatedly raised by the public at hearings, and discussed in some of the Summary Notes, are not addressed in the proposal because they were not hot-button issues in 2005.

The issue of development densities in the rural/suburban interface has come up repeatedly and it appears that there are no clear criteria for when and where rural lands are converted to suburban densities. The County has said that it does not intend to accept new roads into the county system due to cost. But by plunking higher density development in the middle of rural areas, instead of converting those lands incrementally, the county is increasing its maintenance costs, as well as the costs of other service providers, and distressing rural residents who had no expectation of losing their rural atmosphere. By not addressing this in the document it will continue to be decisive and occupy more of the County's and public's time than necessary.

VRBOs and vacation homes were not an issue in 2005, but there has been an explosion of them, particularly along the shorelines. They can disrupt the atmosphere of current residents, change the character of the neighborhood, lead to dangerous situations on/in the water, impact the capacity of water and sewer districts that have used equivalent residential connections as a measure of capacity and now have homes generating/consuming three or more times the wastewater/water. Those on septic systems that are exceeding the design capacity can impact water quality. This issue is not going to go away and should be addressed in a proactive manner so that both operators of vacation homes, neighbors and service providers have clear expectations as opposed to the vague language now in the Code.

There are now numerous homes on miles of private, unimproved roads in or adjacent to wildlands in areas with an increasing risk of fire. Since they are private the roads are not maintained or plowed by the County, many don't have adequate turn-arounds for school buses or emergency vehicles, and often only provide one point of access which complicates evacuation or emergency access. What is the County's responsibility in notifying those residing there, or wishing to build in those areas, of the limited services and hazards? What is the County's responsibility in requiring or promoting mitigation measures? Even if residents are informed they will expect assistance from the County during and after any crisis and may hold

the County responsible for lack of planning. These issues were covered in the Summary Notes and again there is a need for data regarding how many homes are in these areas, what level of roads they are served by and potential mitigation measures.

Without a thorough plan revision based on current data, these and other issues will not be adequately addressed, nor will the rest of the Plan give developers or residents the predictability that they deserve or provide for the wisest use of public funds. Please push the pause button, save the good work that the Commission has done to date and establish a schedule and process for a full update of the County's Comprehensive Plan, including a robust public participation plan.

Thank you.

Darcey Fugman-Small  
Rick Small  
1767 Lakeshore Dr.  
Sagle