

May 25, 2006

Blaine County Commissioners  
Blaine County Courthouse  
206 1<sup>st</sup> Avenue South  
Hailey, ID 83333

Dear Commissioners:

The Nature Conservancy is pleased to provide the following comments on the draft amendments to the Blaine County Zoning and Subdivision regulations.

We commend the County Commissioners for their efforts to provide a vision and a plan for guiding growth in Blaine County consistent with community values. The Nature Conservancy's community-based conservation efforts at Silver Creek have resulted in the protection of over 10,000 acres of land through fee acquisition and, more importantly for the majority of this land, through the donation of the development rights off these lands by neighboring farmers and ranchers.

For the past few months we have been engaging with many of these same neighbors to continue discussing a shared vision where agriculture, abundant wildlife and a world-renowned spring creek flourish together. Our loose coalition has included landowners, ranchers, and realtors as well as the Wood River Land Trust and Citizens for Smart Growth. Although The Nature Conservancy is submitting our comments separately from this coalition, we acknowledge the importance of this collaborative effort in finding balance and seeking new solutions for managing growth in Blaine County.

Idaho lost 290,000 acres of farmland between 1997 and 2002 to urban development. The explosive pace of change both in the Wood River Valley and across Idaho means that The Nature Conservancy must explore alternative approaches to achieving our goals of conserving important wildlife habitat, native plants and natural communities, and in protecting the 30 year investment we have at Silver Creek.

Specific comments:

1. The Conservancy supports market-based incentives that will protect wildlife habitat, wetlands and other sensitive lands. We support a voluntary and viable Transfer of Development Rights (TDR) program as proposed in Ordinance 2B as the primary means of achieving the County's land use goals.

2. We are very appreciative of the County identifying the initial TDR Sending Areas as the Wetlands/ Ag Protection Area south of Baseline Road. Protection of these lands will protect the majority of the headwaters springs for the Silver Creek ecosystem.

We encourage the County to consider expanding the TDR Sending Area to other parts of the county as soon as is feasible. Expansion of the sending areas should be prioritized to remove development rights from the County's important agricultural and ecological lands, especially in the remote canyon areas containing significant wildlife and fisheries habitats.

3. TDRs should be used to discourage development in agricultural lands, wetland areas and wildlife habitat while encouraging higher-density development closer to the existing cities in the county including Ketchum, Hailey and Bellevue. We encourage the TDR Receiving Areas to be located in and around existing towns, as outlined in the Preferred Scenario.

We do believe the initial TDR ordinance should include designated sending and receiving areas. We recommend the County establish a Citizens Advisory Board to explore the expansion of the sending and receiving areas.

4. In order to facilitate the TDR program and ensure its viability, we acknowledge that some downzoning to RR-40 is appropriate within the A-10 and A-20 lands. However, we suggest that A-10 and A-20 lands that are in close proximity to existing towns not be downzoned.

5. We believe that Planned Unit Developments (PUDs) are inappropriate in certain locations such as in remote areas, near working farms and ranches and near important wildlife and fisheries habitats. Also, PUDS in inappropriate locations could easily undermine the effectiveness of a county-wide TDR program while negatively impacting agriculture, wildlife and other natural resource values. The county should strengthen its ability to deny inappropriate subdivision applications in these areas.

6. We support a provision to allow ranchers and farmers to make limited lot splits for family members.

7. We support the review and improvement of the Wildlife and Riparian Overlay Districts. The Nature Conservancy has ecological information and expertise we would be willing to provide to assist with this process.

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The above comments are accompanied by a commitment from The Nature Conservancy to assist the County in implementing the results of the Blaine 2025 process. We are committed to protecting the remarkable resources of the Silver Creek ecosystem and we are a ready partner should you seek our services.

Thank you again for this opportunity to comment.

Sincerely,

Laura Hubbard  
State Director

Trish Klahr  
Silver Creek Watershed Program Manager

cc: Idaho Chapter Trustees