

To: Mayor Chadwick, Councilman David Hershey, Councilman Kevan Wheelock, Councilwoman Jennifer Salmonsens, Councilman Kevin Nielsen  
From: Citizens for Star  
Subject: Willowbrook Development Zoning

April 12, 2023

Dear City Council,

### **Introduction and History**

We are a citizen group representing Hillsdale Estates, Monument Ridge residents, and 500 members of the Willowbrook Development Information Page on Facebook.

The Star City Council is responsible for establishing, through a series of development approvals, a city that is well-planned, functional, and beautiful.

Hillsdale Estates and neighboring Monument Ridge were originally conceived and developed over the last twenty-five years by Dick Phillips, the primary owner/developer of Willowbrook. It was built for people with a desire to live in neighborhoods that offered a variety of larger lot sizes, from 1-3 acres per house in Hillsdale Estates, 5 acres in Purple Sage, and 10 acres in Monument Ridge. The surrounding area is farmland, and BLM public recreation area.

The current Willowbrook proposal substantially changes the original design from rural to suburban. It changes the style of the homes in the area from the original larger homes with open space to crowded smaller homes that can be built up to 10.54 (per the Willowbrook Site Development Features List) to the actual acre. There are 315 homes currently in Hillsdale Estates and 30 in Monument Ridge. The proposed development will put 1094 new houses, a golf course, a shopping center, and utility facilities adjacent to the existing Rural Residential neighborhood. Willowbrook plans to build these higher density homes within and throughout the current neighborhoods. This is one of the key differences between this development and others that the City often sees. Willowbrook is proposing to develop within the borders of an existing neighborhood.

Star's Comprehensive Plan provides for areas to be set aside for rural living. Hillsdale and Monument Ridge currently offer this. We ask that you preserve the character of these communities by requiring a like-kind approach to the new development, where the visual density matches what is already established.

We request that this proposal be denied, and a minimum 1-acre lot size be set for the new development, consistent with the existing neighborhood (that Willowbrook initially designed) instead of R-2 that turns into a much higher visual density when implemented and clustered.

We support Willowbrook developing their land. The original design for Hillsdale was rural and the next building phase should be consistent with the design of the existing community. A rural, country appearance, with one residence on a minimum 1-acre lot will accomplish that.

If one-acre minimums are not set as a requirement for the Willowbrook development, we have concerns in the following areas:

- Density
- Roads and Traffic
- Non-adherence to Star's Comprehensive Plan and Building Codes
- Schools
- Police, Fire and Utilities
- Sewer and Water

### **Density**

Our biggest concern is the increased density of this proposed project. The applicant is requesting R-2 zoning. However, it doesn't align with the R-1 designation stipulated in the current Star Comprehensive Plan for the special transition overlay area covering all existing lots, which says new homes require larger setbacks and lot sizes than normally required. Hillsdale Estates and Monument Ridge are special transitional overlay areas.

The proposed development includes 716 acres of land, some of which is unbuildable, using 175 acres for a golf course, 91.5 acres for Road Right of Way, and some other things, leaving a net buildable acreage of 314.4 acres. 1094 homes are being proposed for this remaining acreage. This averages out to approximately 3.5 homes per acre, with the smaller patio and 6000-9000 sf lots totaling 67% of the home lots being proposed.

This is a dramatic departure from the existing home density of the current Hillsdale and Monument Ridge communities.

### **Roads and Traffic**

Willowbrook has resisted completing a traffic study prior to approval of their development agreement each time they have approached the City. Now that the traffic study has been completed, the reason they did not want to complete one is apparent. The vast problems identified in the traffic impact study clearly show this area does not support their proposed high level of density.

According to the current Star Comprehensive Plan, the area proposed to be developed by Willowbrook is required to be R1. This not only is consistent with the existing area, but also appears to better accommodate the available road capacity (this would need to be validated by a traffic study).

Willowbrook is asking the city to ignore their own comprehensive plan and allow them to build to significantly higher densities with lots smaller than 1/10th the size that R-1 zoning would lead one to expect. Willowbrook's plan is a piecemeal plan inconsistent with the entire area and is not able to be supported by the existing roads. This will not benefit the city of Star or the existing residents of the rural area north of the city limits.

Willowbrook's proposal to add 1094 units will add over 12,000 trips per day to the existing roads without any reasonable plan to handle the additional traffic. This will not only negatively

impact the beautiful rural area of Star, but also have significant rippling negative impacts throughout Star all the way to Joplin Road.

The roads providing access to this proposed development, W. Deep Canyon Road and Lanktree Gulch Road, are classified as rural residential streets. ACHD will not consider approval of any development which would increase traffic on local rural streets to more than 2,000 trips per day. Willowbrook's proposed solution seems to be to reclassify these streets to collector roads without any modification. Changing these streets to collector roads would be devastating to the existing homes located adjacent to these roads. There is no way for 12,000 trips per day to be added to the existing network of roads within the parameters set by ACHD. ACHD has wisely stated they will not approve reclassification of these roads to collector roads.

Additionally, there are several assumptions for new roads, road extensions, and road modifications that are highly questionable:

- The plan to add a road north through the BLM has not been approved by either BLM or ITD.
- The extension of Wing Road is routed through extremely difficult land and is questionable from an engineering standpoint. It would also create a thoroughfare between existing homes.
- Willowbrook states they will modify CanAda so that it is not as steep. They have said they intend to purchase land and redirect the road. This also is both conceptual and questionable. The existing CanAda corridor homeowners north of New Hope are not likely going to agree to Willowbrook converting this relatively quiet road into a thoroughfare.

In summary, the Willowbrook development does not fit this area, is not supported by the infrastructure, and will stand out as a sore thumb if allowed to be developed as proposed. The current Comprehensive Plan developed by the city is a good plan and, if enforced, will result in our city being developed in a reasonable fashion that benefits the citizens of Star and surrounding areas, as well as current and future developments.

### **Non-adherence to Star's Comprehensive Plan and Building Codes**

The City of Star Comprehensive Plan calls for this area to be rural and we request that the Willowbrook proposal align with this established plan and city code.

The current Comprehensive Plan was adopted in June of 2022 and provides the overall framework for the City and future development. In it there are three Objectives in the Land Use Chapter that speak directly to the proposed Willowbrook development and the existing neighborhoods between Can Ada Road and Highway 16.

- Manage urban sprawl to minimize costs of urban services and to protect rural areas (8-3A-3)

- Retain and encourage rural areas where it will not result in increased costs for urban services (8.4.D)
- Encourage land uses that are in harmony with existing resources, scenic areas, natural wildlife areas, and surrounding land uses (8.4.G)

The Comprehensive Plan shows more dense development near the town center with reduced densities as you move away from the town center, as is standard Planning practice. The area surrounding the Willowbrook development area has been developed through the County as Rural Residential with lots ranging from one to ten acres in size. **Approving the Willowbrook development as currently proposed goes against the three above objectives in the Comprehensive Plan.**

The proposal increases density and sprawl towards the edge of the (future/ proposed) city limits requiring the extension of city services to this existing rural area.

The Comprehensive Plan is very specific that land uses should be in harmony with surrounding land uses. However, the proposed Willowbrook development, which is proposing to develop within an existing subdivision (Hillsdale Estates) and adjacent to other rural residential development (Monument Ridge) is not similar in density at all. The proposal is to create lots that are much smaller and more dense than the existing neighborhoods. Lots that are 3,600 square feet to 12,000 square feet as well as commercial designations are suburban uses and not in harmony with the existing rural residential development on rural roads with no curb, gutter, sidewalks or streetlights. The Willowbrook proposal is in direct conflict with the Comprehensive Plan.

### **Policies Related to the Special Transition Overlay Areas**

The Comprehensive Plan discusses how new development should transition from existing developed areas:

- When an urban density residential development is planned with lots that directly abut lots within a Special Transition Overlay area, an appropriate transition is to be provided for the two abutting residential lot types. A transition must take into consideration site constraints that provide transitional lots and/or open space area avoiding urban lots directly abutting Special Transition Overlay lots. (8.5.4.D)
- Larger setbacks should be required for new lots planned to abut existing Rural Residential lots.(8.5.4.E)

What transition has been provided from the existing rural residential to the proposed suburban development? There appears to be no transition and smaller, more dense development is proposed adjacent to and within existing rural residential development.

## **Policies related to Urban Residential Planning Areas**

The Comprehensive Plan discusses what type of development shall be built near existing rural and large lot developments:

- Low densities within the Estate and Neighborhood Residential Land Use are to be designed within hillside developable areas where new residential lots are proposed adjacent to existing residential lots of one acre and larger where those existing larger lots are not likely to be subdivided in the future. (8.5.3.B)

The Willowbrook proposal conflicts with this policy in the Comprehensive Plan. The proposed lots are small and at a much higher density than the existing developed areas. Larger lots are not proposed adjacent to the existing development.

## **Policies related to Open Space and Special Areas**

The Comprehensive Plan calls for land uses that are in harmony with existing surrounding land uses:

- Encourage land uses that are in harmony with existing resources, scenic areas, natural wildlife areas, and surrounding land uses. (8.4.G)

The Willowbrook proposal conflicts with this policy. Small lots off of suburban roadways with curb, gutter, sidewalks and streetlights are not in harmony with the large lots and rural streets within Hillsdale Estates and Monument Ridge.

## **Housing Objectives (Ch 15)**

The Comprehensive Plan specifically discusses preserving existing rural development.

- Preserve/maintain existing rural housing/development in the increasing urban environment (15.4.F)

The proposed Willowbrook development does nothing to preserve/maintain the existing rural housing in the area. This area is one of the few areas within the Star Comprehensive Plan that is designated for rural residential and per the Comprehensive Plan, and needs to be preserved.

The City of Star must ensure the Willowbrook proposal follows the objectives and policies within the Comprehensive Plan. The proposal must blend in with the existing developed neighborhoods with proper buffers and transitions from one land use to another.

## **Schools**

The West Ada School District letter dated 9/14/21 (see attached Exhibit A), states that it cannot accommodate the projected additional 938 students from this new Golf Course Community.

They also state a bond will be needed and land will be accepted for donation. However, land donations do not guarantee a school will be built.

Approving Willowbrook guarantees Ada County more taxes (school bonds), and if not passed then we must accept overcrowded classrooms. With the high number of school bonds requested over the past few years, there is no predicting when the next bond will pass. In fact most bonds have not passed.

In addition, West Ada letter states there is land being donated from Willowbrook. Where is this land located? If located at the top of Purple Sage, was this factored into the TIS for Can Ada, Deep Canyon, and Purple Sage?

Although it has been stated the City hold no control over West Ada School District, school capacity and traffic are impacted by population. High density yields more need. To approve Willowbrook without having a plan for increasing school capacity goes against the spirit of the council and leaves children with a deteriorated education. As you can see from the table below the Star schools cannot accommodate the added 938 new students for Willowbrook’s development.

(Approved Development  
Projected Student Count)

	<u>Current Enrollment</u>	<u>Capacity</u>	<u>Approved prelim plat parcels per attendance area</u>
Star Elementary	614	650	2900
Star Middle School	830	1000	8148
Eagle High School	1805	1800	5145
Galileo STEM Academy	739	775	N/A

**Public Safety**

The Board of County Commissioners held a meeting March 20, 2023. In that meeting Chief Deputy Sheriff Hart stated the following burden on police:

- For the past 25 years they’ve had 8 deputies per patrol team. The staffing level on patrol has not changed in 25 years while the County’s population has risen 85%.
- Over the past years the workload for patrol deputies has increased 32% passed on call volume.
- Due to need, deputies need to be pulled from jails leaving vacancies.
- Crashes have increased 25% on average in the past five years.
- Impactful for deputies to have increased workload over time without relief.

We have concerns about public safety. With all the growth happening in Ada County, how does Star plan to help train, staff, and support the increasing needs to ensure all these new developments have the protection they need.

### **Sewer and Water**

Sewer lines and treatment create challenges in the hillside community. Because the plan is to have Star Sewer and Water own and operate the system once it is built by Willowbrook, Mr. Mitchell has explained that water, sewer and treated sewer water lines will be connected from SS&W facilities in Star to the new development. As the golf course and houses are built, a new sewage treatment plant may be constructed to treat sewage from the development and treated water will be used to water the golf course. Treated sewage water will initially be supplied by SS&W for the purpose of watering the golf course and recharging existing wells supplying potable water to all houses built over the aquifer.

On the latest drawings from WB, a sewage treatment plant is not shown, and no acreage is allocated for it. No drawing is shown for the routing of sewage lines, or which existing roads must be excavated to install a sewage system. Mr. Mitchell has stated that stub-outs will be provided at appropriate places for future access by Hillside and Monument Valley residents in the event of septic system failures of existing houses. However, again, we have seen no drawings of where these stub-outs will be located. As Mr. Mitchell has stated in public meetings, if a verbal promise is not documented in the Development Agreement, it will not be honored by Willowbrook. Therefore, we request to see these discussion points documented in that agreement.

### **We request the following:**

Deny the annexation until a full proposal is submitted that adheres to the current Comprehensive Plan and City Code, and has been approved by ACHD.

The City of Star must ensure that the Willowbrook proposal follows the objectives and policies within the Comprehensive Plan and City Code. This proposal must be in harmony with the existing neighborhoods with proper buffers and transitions from one land use to another.

### **Conclusions**

We are not arguing against development and believe there is a responsible way for Willowbrook to develop the property.

Our group believes that the issues outlined above can be solved by adherence to the Comprehensive Plan and City Code of a "like-kind" development plan that develops homes on a minimum of 1 acre lots. Right now, the new development not only is designed for the purpose of making the maximum amount of money for Willowbrook, but it also completely disregards the existing neighborhoods and the people who live there.

The City's Comprehensive Plan shows the hillside development area as R1. If you allow this R-2 high-density development in this neighborhood, where in Star are neighborhoods that meet the R-1 density you have established in your plan?

Please deny the current proposal, make the minimum lot size one acre for the Willowbrook development and protect current residents and the citizens of Star with a well-written Development Agreement.

Sincerely,

The Citizens for Star organization

Cherie Shields 9947 W. Lanktree Gulch Rd., Star  
Rochelle Henson 5233 N. High Prairie Place, Star  
Lisa Priapi 10325 W. Lanktree Gulch Road, Star  
Anadeane Galbraith 9758 W. Lanktree Gulch Road, Star  
Sabrina Newberry 9909 W. Lanktree Gulch Rd., Star  
Sara Kalfas 4241 Cowboy Lane, Star  
Kyriacos Kalfas 4241 Cowboy Lane, Star  
Richard Moore 25385 Desert Springs Circle, Star  
Monte Smith 10257 W. Lanktree Gulch Road, Star



- Consistent facilitation of partner agency's conditions being met for issuance of CO
- Emerging Issues
  - Unsafe structures for occupancy
  - Ag exempt building – applicability
  - Private roads

The meeting concluded at 3:31 p.m. An audio recording is on file in the Commissioners' Office.

BOCC MAR 20, 2023

#### MEETING WITH THE SHERIFF'S OFFICE FOR PRESENTATION OF A PATROL STUDY

The Board met today 3:36 p.m. for a meeting with the Sheriff's Office for a presentation of a patrol study. Present were: Commissioners Brad Holton, Zach Brooks, and Leslie Van Beek, Sheriff Kieran Donahue, Chief Deputy Sheriff Doug Hart, COO Greg Rast, Captain Harold Patchett, Captain Ray Talbot, Emergency Management Coordinator Christine Wendelsdorf, Communications Manager Roxanne Wade, Lt. Travis Engle, Lt. Brian Crawforth, and Deputy Clerk Monica Reeves. The Sheriff's Office has done in-depth study which includes their most critical needs as well as historical data over the last 25 years. A PowerPoint presentation was given by Chief Deputy Sheriff Hart which is summarized as follows:

#### **Wage and Compensation Program**

- The program has had a dramatic positive effect on the CCSO. Prior to its implementation the turnover rate was 25%; they have not had a single deputy resign since that time.
- In a short period of time the compensation plan has made a tremendous difference with the quality of candidates CCSO has been able to bring in and retain.

#### **Background**

- For the past 25 years they've had 8 deputies per patrol team. The staffing level on patrol has not changed in 25 years while the County's population has risen 85%.
- Impacts of population growth

#### **Call Data and Staffing Shortages**

- Over the past years the workload for patrol deputies has increased 32% based on call volume.
- While staffed at 8 deputies per team they have been operating at 6-7 deputies per team. Last year CCSO was able to transfer four deputies from jail to patrol
- Impactful for deputies to have increased workload over time without relief
- Are now in position where patrol is staffed. Only have five vacancies in the jail.
- Crashes have increased 25% on average in the past five years

#### **Proposal for additional patrol deputies**

- CCSO is seeking 16 new positions brought on at a rate of four per year for the next four years. With the intention of pulling deputies from the jail and given them the opportunity for advancement and different jobs.

Commissioner Holton looks forward on collaborating on how to get this implemented in the budget and make a plan that staffing can reply upon. Kieran Donahue said the team is in the process of preparing a 3-year strategic plan for the Board's review. Command staff has been tasked with producing a strategic plan on the needs from a functional operational standpoint of every division in CCSO, with the information to be provided to the Board by mid-May.

No Board action was required or taken as today's meeting was held for informational purposes only. The meeting concluded at 4:08 p.m. An audio recording is on file in the Commissioners' Office.

MARCH 2023 TERM  
CALDWELL, IDAHO MARCH 17, 2023

#### APPROVED PURCHASE ORDERS

The Board approved the following purchase orders:

- Creative Awards in the amount of \$6653.90 for the Fair
- W-W Mfg. Co., Inc. in the amount of \$9191.35 for the Fair

#### APPROVED CLAIMS

- The Board has approved claims 592993 to 593022 in the amount of \$37,448.20

#### APPROVED EMPLOYEE STATUS CHANGE FORMS

The Board approved employee status change forms for Amber Oquendo, P/T Interpretive Specialist; Parker Allen Smith, Deputy Sheriff – Inmate Control 51003.

#### MEETING TO DISCUSS CONSIDERATION OF OPIOID MONIES AND TO CONSIDER AN ACTION ITEM: PARTICIPATION AGREEMENTS IN CONTINUED RESOLUTION OF THE OPIOID LITIGATION SETTLEMENT PROCESS

The Board met today at 1:01 p.m. for a meeting to discuss consideration of opioid monies, and to consider the following participation agreements as proposed by the Idaho Attorney General and Crueger Dickinson in continued resolution of the opioid litigation settlement process: Walmart,



# West Ada

## SCHOOL DISTRICT

September 14, 2021

City of Star  
P.O. Box 130  
Star, ID 83669

RE: Willowbrook Master Planned Development, PUD-21-02

Dear Planners:

West Ada School District has experienced significant and sustained growth in student enrollment during the last ten years. Applying our Student Generation Rate (.7 per SF dwelling unit), to the Willowbrook Development we predict these homes, when completed, could house 1133 school aged children. This breaks down to approximately 523 elementary, 261 middle school, and 348 high school students. A closer regional analysis of students in the area shows a lower SGR of .58 per single family dwelling. This estimate indicates the number of school aged children may be closer to 938 in total, or approximately 433 elementary, 217 middle school and 289 high school students.

Approval of this development could affect enrollments at the following schools in the West Ada School District:

	<u>Current</u> <u>Enrollment</u>	<u>Capacity</u>	<u>Approved prelim plat parcels per</u> <u>attendance area</u>
Star Elementary	614	650	2900
Star Middle School	830	1000	8148
Eagle High School	1805	1800	5145
Galileo STEM Academy	739	775	N/A

West Ada School District supports economic growth. To meet the need for additional school capacity, West Ada School District will accept the donation of land appropriate for a school site. Passage of a bond issue will be required prior to the commencement of new school construction.

Residents cannot be assured of attending the neighborhood school(s) as it may be necessary to bus students to available classrooms across the district. We ask that you encourage the developer to provide safe walkways, bike baths and pedestrian access for our students.

Sincerely,

Marci Horner  
Planning and Development Administrator