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June 14<sup>th</sup>, 2012

Liisa Itkonen  
Principal Planner  
COMPASS

700 NE 2nd Street, Suite 200  
Meridian, Idaho 83642

Dear Ms. Itkonen,

More than 30 concerned members from Idaho Rivers United attended a focus group with COMPASS to discuss the growth scenarios being considered for Communities in Motion 2040. These members came together to ensure that growth in the Treasure Valley will benefit the Boise River, not harm it

Once the second most polluted river in Idaho, the Boise River is now one of the most popular and valuable assets of southwest Idaho. The regional economy depends on and hundreds of thousands of Treasure Valley residents enjoy the invaluable ecosystem services provided by the Boise River: domestic, commercial and agricultural water supply, wastewater and stormwater disposal, aesthetic beauty, fish and wildlife habitat, floating, swimming, and many other recreational activities. Each of these contributes to the quality of life in the Treasure Valley. Idaho Rivers United members urge COMPASS to make protection of these critical services the number one priority in any growth scenario.

With 2040 projections for population in the Treasure Valley well over one million, the Boise River will face new challenges and threats. These serious challenges include but are not limited to: increased pollution from stormwater and wastewater, loss of wildlife and habitat, floodplain encroachment and increased risk of flooding, recreational amenity crowding, and loss of public access. Idaho Rivers United has two questions that highlight our gravest concerns for Boise River health. First, what water quality challenges associated with growth can be minimized through land use and transportation planning? Second, how can growth planning protect the river's floodplain and riparian habitat?

Water pollution in the Treasure Valley already diminishes the health and function of the Boise River. Some of the pollution enters the river via stormwater, and new development could cause a drastic increase in impervious surfaces and stormwater pollution. Rain, snow, irrigation, car washing and other activities causes runoff from rooftops, parking lots, streets and highways. The water flows to the river carrying heavy metals, bacteria, sediment, nutrients and other pollutants. Almost 40% of water bodies in the United States that fail to meet water quality standards are polluted by stormwater runoff.

Paved surfaces generate 16 times more stormwater runoff than the natural environment they replace. The economic impacts of stormwater pollution in the Boise River and required stormwater management and treatment cost Treasure Valley communities a lot of money. These costs can be offset or reduced by making smart choices about how and where we grow our communities and infrastructure.

The second major concern of IRU is encroachment on floodplains and riparian habitat of the Boise River and its tributaries. An extensive body of research documents the environmental costs associated with building in floodplains, identifying this type of development as an environmentally unsound practice. It is widely recognized that floodplain development degrades or destroys wetlands, changes the river's ability to attenuate high flows thereby increasing flood-caused damages, increases water pollution, damages bird, fish and wildlife habitat, and increases demand for very expensive and often ecologically damaging structural mitigation. This destructive dynamic is at play in Ada and Canyon County as local municipalities allow floodplain development and then seek federal help, possibly through building a new \$1 billion dam on the Boise River, to reduce flood risk.

Floodplain development causes incredibly negative economic and ecological consequences. Recently released flood risk simulation maps prepared by the National Oceanic Atmospheric Administration show that unwisely developed areas of the Boise River floodplain are at risk of incurring enormously costly damage from high water flows. Today, communities all over the United States are spending five times more money every year on flood damage repair than they did 50 years ago. In the Treasure Valley, which is already at risk for flood damage and where ecological consequences of floodplain development are evident, further development in the floodplain is indefensible.

Communities in Motion 2040, gives us the opportunity to shift to methods and patterns of growth which can preserve, protect and even restore the waters that sustain and add value to our communities. After considering just two of the ways in which Treasure Valley growth threatens the Boise River, Idaho Rivers United offers these recommendations for what the Treasure Valley should look like in 2040.

COMPASS should encourage growth plans that support the least development in floodplains and along the Boise River. No new development should be planned for the 100 year flood plain of the Boise River and its tributaries. It should be recognized that new development in low-lying areas between the Bench and the foothills in Ada County should be severely restricted. Any infrastructure that must be placed in the floodplain must have no adverse impact on water flows.

Relocation of buildings and infrastructure out of the most flood-prone areas should be planned for. No rebuilding of flood damaged property should be allowed.

Water flow in the Boise River should not be further depleted. Water for new development should come from increased efficiency or be transferred from existing uses.

Consequently, development should be concentrated in and around areas that already have water delivery or have plentiful, clean groundwater supplies.

Additionally, development should be in areas where water infrastructure will require the least expansion, so that funds may be allocated instead to address stormwater management, especially the improvement of stormwater management in older parts of our cities. Savings on new infrastructure development can be spent on a range of stormwater improvements, including installation of permeable pavement to mimic natural hydrology, capturing stormwater for reuse and restoring wetlands to filter stormwater.

All federally funded transportation projects should require the most advanced techniques for stormwater management including permeable pavement and other practices that mimic the natural hydrology. Federal funds should be sought to redevelop existing roads that contribute to stormwater pollution of the Boise River.

COMPASS should encourage growth along transportation corridors that are farthest from the Boise River, such as higher sections of Chinden, Fairview, Ustick/Cherry, I84 and Overland, and create disincentives to continued development along State St. and the adjacent Boise River floodplains. This will not only result in a preservation of Boise River health, it also provides substantial economic benefits to the Treasure Valley through reduction of future emergency and flood damage costs.

In closing, Idaho Rivers United encourages COMPASS to plan for a better Boise River, one that provides a full suite of sustainable ecosystem services. COMPASS can provide important leadership for the community-wide effort that is needed to preserve or restore wetlands, restore riparian vegetation and wildlife habitat, improve water management, reconnect the river with the natural floodplains, and set aside recreational areas and open space. Idaho Rivers United urges COMPASS to advocate for land use and transportation policy that improves the function of our river system so our communities will realize substantial economic and ecological benefits by 2040.

For the Rivers,

A handwritten signature in cursive script that reads "Liz Paul".

Liz Paul  
Boise River Campaign Coordinator  
Idaho Rivers United

*Urban Growth and the Boise River*  
Idaho Rivers United and COMPASS focus group  
*Garden City Hall, 6015 N. Glenwood St.*  
*5:30-7:30 p.m., June 6<sup>th</sup>, 2012*

Scenario Group Presentation Notes

### **Active Corridors**

Summary: This scenario locates new housing and jobs along **transit corridors**. **High capacity transit** would serve State Street (Highway 44) and a route parallel to Interstate-84. Much of the new growth would be **higher density and mixed use**. Key goals include **minimizing congestion** and **improving housing + transportation affordability**.

### **Scenario Specific Comments:**

- Wildlife habitat impact and protections are not evaluated in plan
- Do not like development expansion along the river, floodplains and river tributaries
- Potentially less impact because density of development seems farther away than other plans
- Garden City growth plans present large impacts for Boise River due to close proximity
- Where are the financial resources coming from? Concerned about per-capita spending in small towns not being efficient use of funds in this growth scenario
- Do residential or employment developments along the river have larger impact? We think employment centers present less impact than residential housing along river- reduce personal transportation by encouraging public transit, no on-the-river house building in riparian habitat, lower storm water runoff
- Concerned about expansive agricultural land use along river past Eagle, presents huge non-point pollution impact

### **General Comments:**

- Effective and enforceable regulation needs to be included for successful protection of the Boise River
- Climate change should be considered
- Water conservation efforts and efficiency requirements are necessary
- Restrict private land development along river and floodplains
- Establish boundaries for development along the river, with protections that mimic development restrictions in the Boise Foothills

## Hometowns

Summary: This scenario builds existing cities into “**complete communities**” with local jobs, housing, parks, and schools within **Areas of City Impact**. Most single family homes would be built as “infill” within **existing neighborhoods** and would be located **near existing parks and schools**. New jobs, including industrial, commercial, and office space, would be concentrated near the rail line. This scenario could **potentially support new highway development** given the new development in rural areas. Key goals include **shorter commutes** and **lower infrastructure costs** with more consistent **jobs-to-housing balance**.

### **Scenario Specific Comments:**

- Concerned about ability to attract new employment to planned areas- if employers do not come, problems of congestion and associated pollution continue/increase
- Moving growth away from Boise River decreases pressure on the resource in terms of recreation and other ways (i.e. pollution)
- “complete communities” seem problematic, have previously failed (Hidden Springs) and would likely not succeed in jobs-to-housing balance and city containment
- Would require relaxation of density restrictions
- Like that people would be more “local” in their communities
- Enjoy that it spreads out the recreation and increases proximity to usable parks
- The concentrated pockets allow better mass transit options/development in the future
- Offers less traffic, which equates to less pollution for Boise River and greenhouse gases
- Not sure if water and sewer construction would be cheaper?
- Will water usage decrease or increase as the smaller communities are filled, as opposed to agricultural density that exists now?
- Will higher density housing pull more water out of the table?
- Government entities are already established in these communities, so they have control over what happens, which eases implementation

## **Outdoor Playground**

Summary: This scenario maintains region's agriculture and recreation opportunities with **farmland preservation, regional open space, and a robust trails and parks network**. This scenario provides for **density in major centers** and lower density in areas **outside of environmental constraints** and may call for development of new highways and more rail transit. Key goals include **better access to parks** and **maintaining agricultural and environmental resources**.

### **Scenario Specific Comments:**

- Extensive new infrastructure would be required
- Like the growth moving away from the Boise River and out of the floodplains
- Increased traffic congestion from this is a major concern from air pollution and general traffic problems
- Maintains agricultural growth
- This needs better bike lanes throughout to work effectively

### **General Comments:**

- Would be good to concentrate on fast transit roads over slow roads
- Potentially extend rail for transit from I-84 to surrounding areas like Eagle, Star, Middleton, Caldwell, etc.
- Mini-parks would be better than the big parks, and they should be moved away from congested areas to more local places for ease of recreation and enjoyment
- Status quo growth reflects the "Active Corridor" option, which we would like to see change quickly to growth away from the Boise River
- Existing planning by Parks and Rec and other entities (*Comprehensive Plan about open space and parks with protection, Boise River Trails Plan by all 7 cities on the River, Eagle Island Park plan*); need to be layered into this planning process and this process should seek to aid their implementation- do not need to re-do this work as it is already done
- Increased water waste regulation needs to be included

## **Town and Country**

Summary: This scenario enables **cities to become denser and more walkable** while small, rural towns would see minimal growth. This scenario includes **a variety of housing choices** with the **highest density** options, and the most **new multifamily development**. **Robust transit** would support the higher density, **walkable communities**. Key goals include **agriculture protection, walkability, and access to a mix of uses** in central areas.

### **Scenario Specific Comments:**

- Residential density highest along the Boise River (state street corridor)
- Employment density is highest along the I-84 corridor, with high densities in Meridian and Boise downtown areas
- Growth pattern results in higher density employment centers away from the most sensitive river areas
- Traffic congestion would be higher resulting from disconnect between residential and employment sectors, which also decreases the walkability of towns/cities
- Might impact need for more infrastructure development (maybe more bridges)
- Access to river might increase with residential land use next to river
- River residential ownership might increase personal stewardship of residents
- Why is the residential density not higher along the I-84 corridor?
- What is going on in SW Boise and airport flight path? Low in residential and employment density.
- Environmental concerns about building along drainages, wildlife habitat impact, etc.
- What kind of employment will be found along State Street? How does this effect transportation to employment areas? With high residential, you would think you would like to have some employment opportunity to mitigate traffic congestion and reliance on personal transit.
- Does not mitigate traffic/congestion problems.

### **General Comments:**

- More modern or sustainable development practices for efficient water use practices and storm water capture capabilities is a potential with future developments
- Potential of shifting State Street development to either Chinden or Fairview.
- Keeping some of the towns small was something that we liked, but why was so much of the city development plan on State Street instead of other places that are not on the Boise River?