Cyndy King

From: Sam Smith <sam.adam.smith@gmail.com>

Sent: Thursday, April 24, 2025 8:17 PM

To: Participate

Subject: Comprehensive Plan

Thank you for the work done to date and your efforts to balance Ketchum's need for increased housing with the community's desire to maintain Ketchum's character. As currently drafted, I do not believe the comprehensive plan strikes the right balance. I encourage the P&Z to (1) change more of the draft mid Warm Springs proposal from high density to medium density (ideally all, but at the least layered so there is a transition from low to medium to high) and (2) maintain existing low-density status for current single-family homes. I appreciate the willingness to incorporate feedback and modify the plan to better reflect views of the community.

As a homeowner in the Sunshine Subdivision, my comments below focus on the increased density proposal in the mid Warm Springs area, but I urge the planning commission to actively listen to feedback from all stakeholders in various parts of town that are being impacted by the comprehensive plan.

Ideally, the comprehensive plan will (1) have near term tangible impact on our housing shortage, (2) require minimal change to current zoning laws, (3) seek to have relatively minor adverse impacts, and (4) those adverse impacts should be shared by as large of a group as possible. Neither the current proposal or recent development decisions align with those goals.

Given the goals above, I was disappointed to see the proposed workforce housing development on the Washington lot shut down. It would have increased housing stock by over 60 units in the near term. It required no change in zoning laws. Parking, which was the issue that seemed to be the development's demise, is an important amenity to downtown but arguably the loss of ~60 parking spots in the context of over 60 new housing units, particularly when there are other parking options downtown, is a relatively minor adverse impact. Lastly, the burden of fewer parking spots would have been largely shared by the entire community although I acknowledge the proximate businesses would likely have had the largest impact. And let's be honest – projects like the Bluebird have helped address our housing shortage while not creating the parking crisis that many feared.

Nevertheless, compare that cancelled development to the mid Warm Springs proposal. The upzoning of mostly vacant land and a handful of current single-family homes from low density to high density does not have a near term impact on housing stock – there is no guarantee if or when the vacant land is developed. Furthermore, it proposes a drastic change to current zoning laws – from low density to high density, a massive step function change and inconsistent with zoning best practices of using transition zones (i.e. low to medium to high, not low to high) and keeping high density in urban core when possible. The adverse impacts are significant and include, among others: (1) a decrease of home values due to non-conforming status and negative impact on mortgage and insurance availability and pricing, (2) environmental impact, (3) lack of infrastructure leading to increased congestion and safety concerns, and (4) loss of view and sight lines – something that is key to keeping Ketchum's character. And lastly, most of the adverse impacts are concentrated amongst a relatively small group rather than shared ownership of this collective issue our community faces.

I'm hopeful that leadership won't pursue a policy that prioritizes parking over property rights but will instead find an appropriate balance that facilitates prudent growth while preserving the character of Ketchum. In that regard, it was encouraging to see an updated draft plan reduce part of the mid Warm Spring proposal from high to medium density. As a non-elected body, P&Z is uniquely positioned to steer the comprehensive plan to a more balanced proposal that promotes increased housing while preserving property rights. I encourage the P&Z to (1) change more of the draft mid Warm Springs proposal from high density to medium density (ideally all, but at the least

layered so there is a transition from low to medium to high) and (2) maintain existing low-density status for current single-family homes.

Sam Smith

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IDAHO DEPARTMENT OF FISH AND GAME

MAGIC VALLEY REGION 324 South 417 East, Suite 1 Jerome, Idaho 83338

Brad Little / Governor Ed Schriever / Director

May 2, 2025

IDFG Comments: City of Ketchum Comprehensive Plan and Code Update

Dear City of Ketchum,

The Idaho Department of Fish and Game (IDFG) recently became aware of the City of Ketchum's proposed Comprehensive Plan and Code Update ("Draft"). As per the current Draft, one of the City's goals is "Preserving and enhancing the natural habitat for fish, wildlife, plants, and other creatures in our ecosystems". These considerations are primarily addressed through both regulatory tools and "with site specific data and information provided by the Idaho Department of Fish and Game". IDFG does not regulate either private or federal land, and we have limited data available for the City of Ketchum area. However, we are committed to assisting a City that is interested in information or professional experience from IDFG. Accordingly, IDFG provides the following comments for the City's consideration.

Comments:

- Appendix B: "Land Demand and Capacity"
 - This appendix summarizes the competing demands that City of Ketchum faces between A) a need for increased housing/development, and B) a need to preserve the scenic/ecological aspect of City of Ketchum culture.
 - Wildlife near or in Ketchum (elk, deer, moose, mountain lions) mainly use intact habitat on currently designated "Open Space", "Residential Transition", or "Low Density Residential". Re-zoning and development decisions will have the least impact to wildlife if prioritized in other land use areas (e.g., Downtown, Industrial Area, Base Areas, Southern ACI).
 - We concur with the Draft that "Deer and elk are also a relatively common sight feeding on south-facing slopes in the Warm Springs canyon...". The Warm Springs canyon is of particular value for wintering elk. Re-zoning or development of parcels in Warm Springs canyon would be expected to decrease big game habitat in the Ketchum area. It may also displace animals into lower-elevation City areas, and increase human-wildlife conflict (vehicle collisions and landscaping damage).
- p.44: "Policy R-3.6. Identify trails and other links to connect usable open space, river and creek corridors, and scenic entryway corridors with other public areas."
 - O Public access is essential for perpetuating outdoor recreation, including hunting and fishing. However, trail development has also been shown to fragment wildlife habitat, cause wildlife disturbance, and reduce overall habitat. Potential wildlife impacts should be carefully weighed for any trail development near open space

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- areas (including from subdivisions/housing onto adjacent public land); IDFG is available to provide technical expertise on specific proposals.
- p.52: "Policy NR-1.9. Work with Blaine County and other land managers to manage noxious weeds on public lands and enforce the management of noxious weeds on private property."
 - O Specifically, ornamental yew (*Taxus spp.*) is common in the Wood River Valley and is fatal to wildlife or humans if eaten. As per Blaine County Code of Ordinances (Section 3-2-3), yews are county noxious weeds; however, yew-caused wildlife mortalities persist in the Ketchum area. Incorporating an Action in the Draft for yew awareness may benefit homeowner awareness.
- p.122: "Action R-3.a. Create maps and other educational materials to promote existing recreational assets, such as river access easements and trail networks."
 - The Wood River Valley area (including Ketchum) currently provides public access opportunities via access easements or similar agreements; however, IDFG is unaware of a centralized database that the public can use to learn of such existing agreements. This action will be more effective if an online database/map is provided on the City website that shows existing recreational assets, including all access agreements.
- p.123: "Action NR-1.b. Offer incentives and/or adopt standards to incorporate wildlife-friendly design considerations into new developments (such as bear-proof trash bins)."
 - o Food-habituated bears have been a significant safety risk in Ketchum, and we anticipate this to increase without specific action. Encouragement of bear-resistant trash bins should be retained in the final draft. This Action will also be more effective if it is also applied to existing developments.
- p.127: "Action SHC-6.a. Update Title 17 to expand allowances for local food production and distribution, including uses commonly associated with urban agriculture, as well as conditions to ensure neighborhood compatibility with urban agricultural practices."
 - Unharvested fruit from trees can cause human safety risks by attracting black bears and by attracting deer/elk, which are prey for mountain lions. We recommend that the updated Title 17 specify that installation of fruit-bearing trees on City property (parks, rights-of-way, etc.) include a plan to prevent bear access to fruit (i.e., harvesting schedule and responsible party, or electrified fences).

Thank you for your interest in information from IDFG regarding wildlife in the City of Ketchum. Please contact Bradley Dawson (Regional Technical Assistance Manager; 208-644-6310) with any questions.

Sincerely,

Craig White

Magic Valley Regional Supervisor

Craig S. White