

Date: September 29, 2026

To:

City of Star Planning & Zoning Commission

Attn: City Clerk / Planning Department

P.O. Box 130

Star, Idaho 83669

Email: snickl@staridaho.org , info@staridaho.org]

Regarding: Public Comment on Proposed Subdivision – Jasper Ridge /Parcel number:
SO419325700

From:

Max Harrold

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Nampa, ID 83687

208-466-4782

margenelunn@yahoo.com

Position: Affected Downstream Landowner / Neighboring Property Owner

To the Members of the Star Planning & Zoning Commission,

Please accept this formal written testimony into the public record for the upcoming public hearing regarding the proposed Jasper Ridge / Parcel number: SO419325700. As an affected property owner and downstream agricultural water right holder, my livelihood and property value depend entirely on the uninterrupted, historical flow of irrigation water delivered via the Pioneer Irrigation District network.

Under Idaho Code § 31-3805 and the **City of Star Unified Development Code (UDC)**, a developer is legally obligated to provide a functional internal irrigation system while strictly protecting the delivery systems and rights of downstream users. To ensure this development does not illegally infringe upon or disrupt my senior water rights, I request that the Commission require the developer to explicitly answer and address the following criteria prior to any preliminary plat approval:

1. Verification of the Preliminary Irrigation Analysis (Star UDC 8-6A-3)

Star UDC 8-6A-3 mandates that the developer submit a *Preliminary Irrigation Analysis* demonstrating the availability of water rights and the exact distribution layout.

- **Request:** I request that the Commission verify whether this analysis has been submitted and formally reviewed by the Pioneer Irrigation District. Does this document provide engineering proof that routing water through the proposed subdivision will leave the

historic volumetric flow rates and head pressure completely intact for downstream users?

2. Engineering Impacts of the Pressurized Irrigation System (Star UDC 8-4A-16)

Star UDC 8-4A-16 requires the installation of an underground pressurized irrigation system operating at a minimum of 45 psi.

- **Request:** The developer must provide an engineering guarantee that the mechanics of pressurizing the subdivision's internal system will not restrict, alter, or cause a drop in the gravity-flow volume that downstream properties depend on. Furthermore, what backflow prevention or isolation mechanisms will be engineered into the subdivision pump station to ensure its operation never backs up or disrupts downstream delivery?

3. Protection and Maintenance of Pioneer Irrigation District Easements

The operations, maintenance, and dredging easements held by the Pioneer Irrigation District must be protected in perpetuity to prevent flooding and delivery failures.

- **Request:** Will the final plat explicitly protect these rights-of-way? Additionally, who will hold legal liability and maintenance responsibility for the shared ditch, pipe, or weir structures running through the subdivision—the Pioneer Irrigation District, a newly formed HOA, or individual lot owners? Downstream farmers must be guaranteed continuous, unhindered physical access to any upstream headgates, valves, or measuring devices located within the subdivision boundaries.

4. Late-Season Water Restrictions and HOA Oversight

During years of low water availability or late-season cuts by the Pioneer Irrigation District, conflicts often arise between residential HOAs and downstream agricultural users.

- **Request:** What binding conditions will be placed on the subdivision's CC&Rs and HOA operating rules to legally prevent them from over-pumping or depleting the irrigation pool at the expense of downstream senior water right holders when water allocations are reduced?

5. Stormwater Runoff and Contamination Safeguards

Urban development introduces chemical contaminants (fertilizers, pesticides, automotive fluids) and stormwater runoff that can severely damage downstream agricultural operations.

- **Request:** What physical, engineered safeguards and retention basins are required for this plat to guarantee that polluted urban runoff is completely isolated and prevented from draining into the downstream agricultural water supply?

I respectfully ask that the Planning & Zoning Commission condition any approval of this preliminary plat upon the developer securing a signed, written agreement with both the

Pioneer Irrigation District and the impacted downstream landowners, ensuring that our historical water delivery is structurally and legally protected.

Thank you for your time, consideration, and dedication to protecting Star's agricultural heritage and property rights.

Sincerely,

Max Harrold