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119 E. Bullion Street  
Hailey, Idaho 83333  
Phone: 208.788.3947

[WoodRiverLandTrust.org](http://WoodRiverLandTrust.org)  
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July 15, 2024

**PUBLIC COMMENT**

Bellevue Planning and Zoning Commission  
Regular Meeting on Monday July 15, 2024

To the Chair and Commission of Bellevue Planning and Zoning,

Thank you for your careful deliberation as you consider a variety of perspectives on the proposed Text Amendment to Title 10: Zoning regulations, Chapter 7: Business District, Section 10-7-2: Permitted Uses. The proposed zoning ordinance pertains to land adjacent to the Howard Preserve, as well as to the patterns of development and growth in the south valley. Our comments on the ordinance are three-part:

**1) Protect the Floodplain**

A significant portion of the Business District west of Main Street is located in the Special Flood Hazard Area, as demarcated by FEMA, addressed by Idaho State Statute (Sections 46-1020, 46-1023, and 46-1024) and protected by the City of Bellevue in Title 12: Flood Damage Prevention Ordinance of the Municipal Code. Per the Howard Preserve Conservation Easement Agreement, the City of Bellevue and Wood River Land Trust have agreed to protect the natural floodplain ecosystem, provide recreational public access and limit development along the stretch of the Big Wood River between Broadford Road and Walnut Street—including the City-owned parcels, below the bench on Blocks 91-95. While the conservation easement largely prohibits development on Blocks 91-95, the current boundaries of the Business District also encompass parcels in the Special Flood Hazard Area north and south of the preserve. The Business District zoning below the bench compromises the Conservation Values of Howard Preserve and the Big Wood River corridor—as well as the Bellevue Comprehensive Plan statements supporting local natural and recreation amenities. At this point in time, the Land Trust urges the Commission to exclude parcels in the Special Flood Hazard Areas from the density increases proposed in the proposed zoning ordinance.

**2) Density in Downtown Bellevue Makes Sense**

Vibrant downtown cores are marked by attractive commercial uses and public amenities, such as sidewalks and transit services. Increasing the permitted density of commercial, residential and mixed-use developments along Main Street is a smart and efficient use of land. Accommodating growth within the existing footprint of Bellevue's development and in proximity to downtown amenities better positions the conservation of open-space in our canyons and on agricultural lands. Low-density zoning drives sprawling development. In order to manage wildfire risk along our Wildland Urban Interface and sustain natural resources, like water, we must grow smartly and maintain a compact community design.

**3) Include a Community Housing Incentive**

Market-rate housing is distinct from community housing—market-rate housing is financially out-of-reach or burdensome for most people earning local wages. The proposed ordinance solely zones for market-rate housing; as such, it does not guarantee housing for locals and may only exacerbate the need for more housing development. The Land Trust recommends that the Commission amend the ordinance to include a community housing incentive, i.e. a mechanism that grants development applicants greater density in the downtown core when the development includes some number of community housing units that are legally restricted to locals.

The Land Trust appreciates its ongoing relationship with the City of Bellevue, as well as the Friends of Howard Preserve and Wood River Valley Irrigation District #45 with whom we collaboratively steward Howard Preserve. Working together, we are better prepared to balance growth and steward a livable future.

In the spirit of community partnership and for ease of consideration, the Land Trust has provided example language that would protect the floodplain and include a community housing incentive in the proposed zoning ordinance.

Sincerely,



Cece Osborn  
Community Planning Director

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Example language that would protect the floodplain and include a community housing incentive under “10-7-5: DIMENSIONAL, BULK AND BUILDING COVERAGE STANDARDS AND REQUIREMENTS:” of the proposed ordinance:

E. Density

1. Development in the Business Overlay District shall allow for a base density of 12 units per acre.
2. Business District parcels located in the Special Flood Hazard Areas shall not exceed a base density of four (4) units per acre.
3. Community Housing Incentive
  - a) Development in the Business Overlay District may volunteer to exceed the Business Overlay District's base density by four (4) units, for a maximum of sixteen (16) units per acre, provided that a minimum of two (2) units in the development are dedicated as community housing units.
  - b) Community housing units shall comply with the following requirements:
    - 1) The community housing units shall be deed restricted for sale or rent as a community housing unit in perpetuity, prior to issuance of Certificate of Occupancy.
    - 2) The deed restrictions placed on the community housing units shall comply with the income, occupancy, and/or other criteria established the Blaine County Housing Authority “Community Housing Administrative Policies.”
    - 3) The deed restrictions placed on the community housing units shall meet the priority needs outlined in the Blaine County Housing Authority’s most current “Blaine County Housing Needs Assessment.”
    - 4) Each community housing unit shall be identical to at least one (1) market-rate residential unit in the same building.