

To: Valley County Planning and Zoning Commissioners  
From: Rebecca and Scott Hurd, McCall  
Date: March 30, 2026  
Re: March 31, 2026 Work Session, PUD 26-001 – Red Ridge Village

**Red Ridge Village Is Not a PUD. Proceeding as One Is Premature.**

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The March 31, 2026 work session agenda dives right into Idaho Code 67-6512, a procedural vehicle inside the PUD process. It includes development agreements, mitigation, proportional share, agency identification. It is a framework for processing RRV as a PUD.

We ask the Commission to pause before going further.

These are the right tools for the right project. RRV is not that project because RRV is not a PUD.

**I. The Threshold Question the Agenda Does Not Ask**

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Before the Commission discusses conditions, mitigation criteria, or agency lists, it must address a question the March 31 work session’s agenda skips entirely: is RRV a PUD at all?

By proceeding directly into a presentation of Idaho Code 67-6512 development agreements, mitigation of impacts and proportional share, the Commission implicitly accepts that RRV is a valid PUD to be approved with the right strings attached. That acceptance is premature — and every step taken at the March 31 work session toward designing those conditions makes it harder to later conclude the project should never have been processed as a PUD.

Valley County’s PUD ordinance was designed for projects that cluster buildings to create open space. Idaho Code §67-6515 — the state’s entire PUD statute — is four sentences written in 1975 for that same purpose. Neither was written to authorize a self-governing community of 1,800 people with private water, sewer, roads, and fire funding governed by an HOA. DF Development’s own application describes RRV as “the front door to more than 30,000 acres of pristine terrain in Valley and Adams counties.” A PUD permit is not a door to a two-county development. It is a site design tool.

If the Commission concludes that RRV is not appropriately processed as a PUD, the Commission’s role is clear: deny the application as filed, without prejudice, and refer the matter to the Board of County Commissioners with a recommendation to create a regulatory framework adequate to what is actually being proposed — whether a large-scale PUD category, a planned community ordinance, or an interim moratorium under Idaho Code 67-6524 while that framework is built. The Commission cannot create that framework, only the Board can. But the Commission can and should put on the record at the March 31 work session that no adequate category currently exists, and that proceeding to design conditions for an application that may not belong in this category at all is premature.

## II. The PUD History Review Will Prove the Point

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The agenda includes a review of every PUD Valley County has approved: Jug Mountain Ranch, Meadows at West Mountain, Tamarack, Garnet Valley, MacGregor Townsite. We ask the Commission to hold one question in mind during that review:

*Does any prior Valley County PUD propose 722 residential units, a 50,000 sq. ft. commercial village center, 1,800 residents, 8,071 daily vehicle trips, and its own private water, sewer, road, and fire funding systems?*

The answer is no. Not one comes close. That is not a coincidence. Valley County's PUD ordinance — adopted in 2010, amended once in 2011 to loosen setbacks — was never amended to address scale, population, or infrastructure governance. The history review is the Commission's own evidence that RRV does not belong in this category.

## III. A Note on Idaho 67-6512 and the Current Record

Should the Commission proceed to evaluate RRV as a PUD, note that Idaho Code 67-6515 routes all PUD applications through Idaho Code's 67-6512's special use permit standards. Three provisions bear directly on this application. Idaho Code's 67-6512(a) requires a finding that political subdivisions — fire districts, road districts, EMS, schools, and the City of McCall — have the ability to provide services for the proposed use. None have committed to serve RRV, and McCall Fire & EMS and Donnelly Rural Fire Protection District have stated on the record they cannot without additional funded capital improvements. Idaho Code 67-6512(e) authorizes the Commission to require studies of social, economic, fiscal, and environmental effects before granting — none of which has DF Development provided. Idaho Code 67-6512(d)(8) requires mitigation conditions for service delivery impacts, which cannot be drafted without the completed studies that do not exist.

## IV. A Note on Development Agreements and Proportional Share

If the March 31 work session is an educational introduction to these tools, note that development agreements and proportional share analysis are useful instruments — but only within an adequate regulatory framework. A development agreement cannot create fire service capacity that does not exist, secure water rights that are not held, or substitute for the infrastructure governance framework Valley County's PUD ordinance lacks. A proportional share calculation requires a completed baseline — which DF Development has not provided.

## V. Valley County Is Being Asked to Approve the Front Door to a Two-County Development

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Before the Commission identifies agencies, groups them, and sets mitigation criteria, it should address what DF Development's own application says about the scope of this project:

*“Red Ridge Village is envisioned as the front door to more than 30,000 acres of pristine terrain in Valley and Adams counties.” — RRV Concept Application*

DF Development is Adams County’s largest private landowner — 60,930 acres across 194 parcels. DF’s own original concept application noted that approximately 4,000 additional homes could be built on Adams County lands, which contain 28,700 of the 30,920 contiguous acres. Development of that land, per DF’s own representative, would not occur until Red Ridge Village is substantially complete — in 15 to 20 years. Adams County’s P&Z Director confirmed in November 2024 that preliminary talks with DF have occurred, though no application has been submitted.

The traffic study counts only RRV-generated trips. It contains no analysis of cumulative traffic from future Adams County development funneled through the same rural road network. The wildlife baseline does not exist for RRV, let alone for the broader corridor. No agency list, mitigation framework, or development agreement assembled today addresses what the application says is coming next.

The Commission should require, before any further work session proceeds, that DF Development fully disclose its development intentions for the Adams County corridor — phasing plans, infrastructure plans, access roads, and population projections. Without that disclosure, no study, condition, or agreement assembled for RRV alone can be considered complete.

## **VI. The Paths Forward**

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**1. Deny the PUD application as filed — this is not a PUD.** The Commission should find on the record that RRV does not qualify as a PUD under Valley County’s ordinance or Idaho Code 67-6515, and deny the application without prejudice. This is not a denial of the project. It is a denial of the wrong application category. The next steps that follow from that finding are:

**a. Refer to the Board of County Commissioners** with a recommendation to create a regulatory framework adequate to what is actually being proposed — a large-scale PUD category, a planned community ordinance, or both. Bonner County and Ada County have done exactly this under the same Idaho statutes that govern Valley County.

**b. The Board may adopt an interim moratorium under Idaho Code 67-6524** on PUD applications above a defined scale threshold while that framework is built — up to one calendar year. The 2025 Comprehensive Plan update contains no policies on large-scale PUD development. That absent component can be initiated by Commission motion at the March 31 work session. The Board must separately find and state in writing that an imminent peril to public health, safety, or welfare requires a moratorium — a finding the current RRV record supports independently.

c. **DF Development may reapply** under the new framework once it exists, with required studies complete, fire service secured, and Adams County development plans fully disclosed. Reapplication does not guarantee approval.

**2. If the Commission proceeds as a PUD: resolve the Idaho 67-6512(a) threshold first.** Before designing conditions or proportional share obligations, the Commission must formally address whether it can make the service-capacity finding Idaho 67-6512(a) requires — that fire districts, road districts, EMS, schools, and the City of McCall have the ability to provide services for this use. On the current record, it cannot. That finding is not a condition to attach after approval. It is a statutory prerequisite to approval. If the Commission cannot make it, everything that follows on the March 31 work session’s agenda is premature.

**3. Require disclosure of Adams County plans** before any further review. The Commission cannot evaluate the front door without knowing what it opens onto. DF’s own application identifies approximately 4,000 additional homes for Adams County lands. No traffic study, environmental analysis, or mitigation framework assembled for RRV alone can be considered complete without that disclosure.

**4. Require completion of studies under Idaho 67-6512(e)** before setting any mitigation conditions or proportional share obligations. Conditions built on an incomplete record are unenforceable and expose Valley County to legal liability.

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Other Idaho counties have already faced this problem. Bonner County created a “Large Scale” PUD category. Ada County built a separate Planned Community framework with its own comprehensive plan and zoning ordinance for each project. Teton County adopted an emergency moratorium when its framework was overwhelmed — and ultimately eliminated PUDs from its code entirely. All acted under the same Idaho statutes that govern Valley County.

*The Commission has both the authority and the obligation to hold this line — not against development, but against the wrong process for the wrong project in the wrong place.*