

Growing Together LLC
301 Warehouse St.
Caldwell, ID 83605



Date: September 26, 2025

Canyon County Development Services /
Board of County Commissioners
111 N. 11th Avenue, Suite 310
Caldwell, ID 83605

Re: Middleton AOI

Dear Commissioners,

We respectfully urge the Board to reject Middleton’s proposed AOI expansion and instead require a significant reduction consistent with state law and Canyon County’s Comprehensive Plan.

Idaho Code §67-6526(4)(b) is unambiguous: *“An area of impact shall not exceed the areas that are very likely to be annexed to the city within the next five (5) years.”* No evidence in Middleton’s submission demonstrates that the 3,100 acres of farmland north of Purple Sage Road—including two operating dairies—or the 2,100 acres between Cemetery and Kingsbury Roads are very likely to be annexed in that timeframe. These tracts remain actively farmed, are designated Intensive Agriculture in the County’s 2030 Comprehensive Plan, and lie well beyond the city’s serviceability.

Farmland preservation: Idaho Code §67-6508(e) and Goal LU-3 of the Canyon County Comprehensive Plan require that prime soils and agricultural operations be preserved and protected from encroachment. The lands in question are primarily Class II and III soils, vital to dairies and crop production, and irreplaceable once lost. Farmland contributes more to local tax rolls than it consumes in services, while low-density sprawl imposes long-term costs for schools, utilities, and public safety.

Middleton’s contradictory zoning: Middleton’s own subdivision ordinance prohibits annexation and subdivision approvals under conditions that currently block most residential growth ([Middleton City Code §5-4-4](#)). It is contradictory for the city to claim thousands of acres of AOI while simultaneously restricting the very annexations that would make development possible. As long as this ordinance provision exists, the majority of Middleton’s proposed AOI cannot possibly meet the statutory test of being “very likely” to be annexed within five years.

Fiscal and serviceability impacts: Leaving large areas of impact in place invites speculative development pressure and fuels sprawl. This pattern has already increased the cost of services dramatically for both Canyon County and Middleton residents—requiring costly new schools, road upgrades, and fire protection while straining law enforcement, EMS, and planning capacity. Expanding AOs far beyond what can be realistically annexed only worsens this imbalance.

Legal burden: Under Idaho law, the burden of proof lies with Middleton, as the AOI applicant, to demonstrate that the lands proposed are imminently annexable and serviceable. The record shows no credible phasing, financing, or service plans. Absent such proof, the statutory requirement is not satisfied.

Recommendation: We urge the Board to require an aggressive reduction of Middleton’s AOI—removing all farmland north of Purple Sage Road, the 2,100 acres between Cemetery and Kingsbury Roads, and any other tracts designated Intensive Agriculture. Large AOs that cannot be annexed under Middleton’s own code not only fail to meet Idaho Code §67-6526, they also encourage sprawling growth patterns that burden taxpayers and erode Canyon County’s agricultural base. The AOI should be limited strictly to parcels immediately adjacent to the city where annexation and service provision are realistically achievable within five years.

Respectfully,

George Crookham



President, Growing Together

cc. Growing Together Advisory Board

Growing Together, LLC

Mission Statement: To improve citizens' knowledge of local land use planning and to support good economic land use decisions.
