

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: Star AOI

Dear Commissioners,

We strongly oppose Star's proposed AOI expansion into the foothills, south to the Boise River, and west toward Highway 20/26.

Idaho Code §67-6526(4)(b) is clear: "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." Star's submission fails this test. The proposal includes more than 1,000 acres of farmland north of Purple Sage Road, 700 acres south of the Boise River, and even federal BLM lands. No evidence of near-term annexation has been provided. Instead, the city relies on generalized Treasure Valley growth trends and speculative assumptions about future service capacity.

Farmland preservation. This approach directly contradicts Idaho Code §67-6508(e) and Canyon County's 2030 Comprehensive Plan (Goal LU-3), which mandate protection of prime farmland and direct growth to serviceable areas. The agricultural lands targeted in Star's AOI support dairies, row crops, and livestock operations on Class II and III soils—resources that are irreplaceable once converted. Farmland remains fiscally positive, contributing more in property taxes than it consumes in services, while sprawling residential growth produces ongoing fiscal deficits.

Serviceability concerns: The AOI expansion areas are well beyond Star's realistic five-year service horizon:

- Fire/EMS: Star is served by the Star Fire Protection District (MidStar Fire), a joint district with Middleton that provides fire and EMS. The district operates two stations and is planning a third, but is already experiencing call volume increases from rapid growth. Staffing and funding are constrained by Idaho's property tax caps (HB 389). Adding foothills, riverfront, and farmland into the AOI would overwhelm district resources without major new stations and crews.
- Law enforcement: Star does not operate its own police department and contracts with the Ada and Canyon County Sheriff's Office for law enforcement. Additional annexations would increase patrol demands on an already thinly stretched sheriff's office unless the city commits to funding additional deputy coverage.

- Water & utilities: Water service in Star is provided by a private utility. Extending service into AOI areas—particularly foothills and agricultural tracts—would require costly infrastructure that is not currently financed or engineered.
- Medical & community services: Star lacks a hospital or emergency medical facility. Residents depend on regional hospitals in Nampa and Boise, with EMS transport provided through the fire district. Limited local clinics exist, but they cannot absorb large-scale growth without significant expansion. Community amenities such as parks, recreation, and social services also lag behind growth.

Rapid growth pressures: Star has already experienced extraordinary population growth in recent years, placing strain on fire/EMS, law enforcement, utilities, and schools. Without a substantial increase in staffing, facilities, and infrastructure funding, the city is already at the edge of its service capacity. Expanding AOIs into thousands of additional acres—much of it farmland and federal land—will only exacerbate these pressures and worsen the fiscal imbalance.

Speculative inclusions: The inclusion of BLM-managed lands in an AOI is particularly untenable, as those lands are not privately held and cannot reasonably be annexed or serviced within the statutory five-year timeframe. Their inclusion underscores the speculative, overreaching nature of Star’s request.

Legal burden: Under Idaho law and county practice, the burden of proof lies with Star, as the AOI applicant, to demonstrate that each parcel within its proposed boundary is “very likely” to be annexed and serviceable within five years. The record offers no such evidence—no phased annexation plan, no funded service expansions, and no justification for leapfrogging into farmland and federal land. Without this proof, the statutory requirement is not satisfied.

Recommendation: We urge the Board to reject Star’s AOI expansion and confine its boundaries to infill areas immediately adjacent to existing city limits where annexation and service provision are realistic within five years. At a minimum, the areas north of Edna Ln. and south of the Boise River should be removed from the Area of Impact. Leaving large swaths of farmland, riverfront, and BLM land in the AOI not only fails the statutory test but also encourages sprawling growth that burdens taxpayers, stretches county-wide services, and undermines Canyon County’s agricultural economy.

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.
