



February 21, 2018

Kootenai County Board of Commissioners  
PO Box 9000  
Coeur d'Alene, Idaho 83816-9000

MAR 08 2018  
KOOTENAI COUNTY  
COMMUNITY DEVELOPMENT

RE: Building Permits and Subdivision Approval Process Coordination

Dear Commissioners:

This document discusses highway districts' role in managing safety of access and use of rural (local) roads in Kootenai County. Three recommendations are made:

1. Highway districts' role in reviewing building permits, including minor subdivisions, remains unchanged.
2. Parallel tracking of the review process, county and highway districts on the same time line.
3. Continued detailed examination of major subdivisions which may include Trip Generation and Distribution Analysis or a Traffic Impact Study.

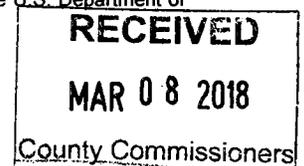
The Kootenai County Association of Highway Districts recently visited with County Commissioner Mark Eberlein at our regular meeting on January 11, 2018. Based on our discussion, we understand that the County is in the process of considering updates to its Comprehensive Plan and we are therefore offering the following comments and proposed action for your consideration:

1. General: the four Highway Districts within Kootenai County are responsible for roadway preservation and safety on approximately 900 centerline miles of rural roads in our county. This authority is assigned to the Highway Districts under Idaho Code 50-1330. Each of the four Highway Districts, have varying traffic demands, budgets, levy rates and urbanized/population influences that impact services provided.

Common duties and responsibilities assigned to Highway Districts include but are not limited to controlling and regulating access and restricting or prohibiting access to best serve the traffic for which the facility is intended (I.C. §40-604.5). Evaluation for compliance of access requirements set forth in the Associated Highway District Standards as it relates to growth impacts, whether through new buildings or subdivisions of any size, fall within the Statutory Authority of Highway Districts.

As of July 2016, our rural roads serve approximately 154,000 people in Kootenai County, which is an 11% increase in Kootenai County in the last six (6) years since 2010. In comparison during the same period, growth within our state increased approximately 7% since 2010, while nationally population increased just 4.5%. The population of Kootenai County is also approximately equivalent to 9.2% of the population in our entire State (1,683,140). Since 1970, we've seen a steady 3% increase in population.

\*Source: Calculations by the Idaho Regional Economic Analysis Project (ID-REAP), with data provided by the U.S. Department of Commerce, Bureau of Economic Analysis, November 2017



What we may already know and see from the population estimates, is that more people are moving to Kootenai County. This increase in population directly impacts traffic on our roads, making them less safe and creating increased distress due to increased traffic loading from both the associated residential traffic and trucking necessary to support the increase in population. Over the next 10-yrs, based on 3% growth since 1970, we expect our county to grow more than an additional 50,000 people.

Given our basic understanding of both current and future growth in our county, in addition to the authority provided to the Highways Districts through Idaho Statutes, our Association believes it's vital that we provide oversight and guidance on building and subdivision growth impacts on our roadways. Historical experience and reasons set forth in this letter have become justification for our involvement in the current review and approval processes discussed.

2. **Building Permits:** The Association is less concerned about whether a structure outside the impact of our rights-of-way is constructed to certain standards, than we are about safety for not only those planning to access the public roadway system, but also for those currently using our roads. The Associated Highway District Standards (AHD Stds) are designed to provide forward vehicular movement and spacing to ensure safe access and travel. The AHD Stds provide guidance to builders/home owners on appropriate approach spacing, site distance, approach turning radii and other improvements such as mailbox turnouts for new approaches on high speed roads to protect the safety for property owners, support services and others traveling our roads.

The Highway Districts involvement in the current building permit process includes evaluating whether a new approach is required (typical for new home sites) or whether an existing approach is adequate to serve a proposed building. If an approach exists, the Highway Districts typically respond within a matter of hours upon receiving a request for comment from the County. If a new approach requires a site inspection to determine whether safe sight distances exist or drainage culverts and sizing (by District) is required, our response is also typically a matter of hours.

Proposed Action: there is very little to no delay associated with Highway District Review, provided our review parallels the County's review. We propose this process remain unchanged.

3. **Minor Subdivisions:** eliminating the Highway District from the Minor Subdivision review process brings great concern for reduced safety on our local county roads and the potential for unintended consequences associated with creeping incrementalism.

By the authority provided to the Highway Districts through Idaho Statutes, the primary duty of the Highway District is to ensure safe, well maintained roads at the lowest cost. For the sake of safety and ability to serve growth, Highway District review and plat approval authority helps ensure subdivisions of property (growth) can effectively be supported by the local road network. The AHD Stds were established as a uniform guidance to assist in evaluating growth impacts on roads. The following are considerations:

- a. Sufficient available front footage of lots and adjoining lots/approaches to provide adequate approach spacing. The US Department of Transportation, Federal Highway Administration provides guidance on this issue: on higher speed local, rural roads, increase density of drive approaches equates to less safe roads.
- b. Approach design to ensure safe access for residents, including: sufficient sight distance, clear zones for lane departure type accidents, approach angles of intersection and turning radii.

- c. Approach design to ensure access and turnarounds for emergency and school bus services are adequately obtained.
- d. Approach and roadway shoulder design to ensure safety for mail delivery, residents and the traveling public to avoid rear end collision type accidents.
- e. Analysis to determine adequacy of snow storage, utility and drainage easements. Insufficient area to accommodate snow storage and drainage, or both, have caused flooding and roadway damage, with repairs paid for at the expense of the tax payer and/or insurance, which ultimately drives increases in cost for construction and insurance coverage.
- f. Analysis of adjoining roadway clear zones for safety of the traveling public due to incremental increases in traffic. Roadway departure and collisions with immovable objects (trees, landscaping, rocks, concrete or steel posts, etc) within the roadway clear zone are the leading accident type in our County. To this point, over half of the accidents in our State occur on rural (county) roads.
- g. Analysis of adjoining roadways for adequacy (widths and pavement section) to support residential and truck traffic associated with incremental growth. Improved roadway widths provide drivers greater opportunity to recover a potential errant vehicle, avoiding collisions with immovable objects. Addressing improved roadway structure through development associated additional traffic provides means to support additional truck traffic necessary to address development.
- h. Analysis for connectivity of roads or lands adjacent to or beyond proposed subdivision for improved emergency services and maintenance of public roads. An unintended consequence of neglecting this analysis could literally mean life or death associated with a delay in emergency services response to requests for assistance from the sheriff or fire.
- i. Review of minor subdivisions with interior roads insures that no lot will be denied access to a public road. Minor subdivisions not reviewed by the District which have interior lots are not assured access to public roads.

These issues as well as many others are considered for the sake of preserving public safety, not just for those developing their property, but those who already have rights to safe, well maintained roads. Consideration of these issues are exacerbated given the speeds of travel and known highest level of accident probability on the local (County) road system.

Considerations by the County Commissioners to improve the Minor Subdivision process should not eliminate Highway District review of these specialized issues. Continuing with the same level of diligence in the subdivision review process as it relates to roadway safety, can only be a benefit to the public.

We feel a recommended course of action may include parallel tracking of the review process. While the County provides their review, the Highway Districts provide their review comments, contingencies of approval on the same timeline.

- 4. Major Subdivisions: size of major subdivisions exacerbate the need for review and approval by the qualified road authority. In addition to those issues noted above, the major subdivision review process may include a Trip Generation and Distribution Analysis or a Traffic Impact Study, as defined by the AHD Stds. Further, detailed review in this regard is necessary to determine whether development associated traffic impacts such as turn lanes, intersection widening, traffic signals or other improvements are necessary.

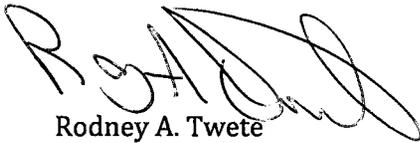
Highway District direct knowledge of the subjects raised herein, in addition to the institutional knowledge dating back nearly 50-years since our formation, is vital in helping to ensure our transportation system function appropriately. Our roadway network is our most valuable public infrastructure investment and carries the highest risk for public safety. Public safety on our roads related to travel and emergency response should not be taken lightly when considering revisions to process discussed herein.

Commissioners, we understand your endeavors to improve and/or reduce County Government is important to you, yet this is a very complicated subject. For the sake of public safety of those traveling on our rural roads, we ask that you consider our concerns. Additionally, we ask that any changes you make do not exclude Highway District review and approval on these matters.

We appreciate your consideration of our comments. We feel the recommended course of action will help preserve the Countys existing transportation infrastructure, safety, capacity and movement of goods through our community.

Sincerely,

The Association of Highway Districts, Kootenai County, Idaho



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Lakes Highway District



James Mangan  
Worley Highway District



Terry Werner  
Post Falls Highway District



Graham Christensen  
East Side Highway District

AHD/es