



Land Use and Building Department

2280 American Legion Blvd.
Mountain Home, Idaho 83647
Phone: (208) 587-2130 ext. 500
www.elmorecounty.org

James Roddin
Director

Johnny Hernandez
Building Official

Colton Janousek
Building Inspector

Josh Proffit
Building Inspector

David Abrahamson
Planner I

Vacant
Planner II

Matt Gouchner
Code Enforcement

Sandra Nuner
Permit Technician

Liz Elliot
*Administrative
Assistant*

Planning and Zoning Commission PUBLIC WORKSHOP STAFF REPORT

Workshop Date: April 2, 2026 **Date Report Compiled:** March 20, 2026

Agenda Item: Pacific Steel and Recycling Auto-Shredder Residual Repository (Non-Municipal Solid Waste Landfill) Public Workshop

Owner/Applicant: Pacific Hide & Fur Depot dba Pacific Steel and Recycling

Representative: Great West Engineering

Case Number: CUP-2025-04 Conditional Use Permit with Master Site Plan Application

Associated Cases: DA-2026-001 – Development Agreement Application
ADD-2026-009 – Hillside Development Application

Elmore County Staff:

James Roddin, Director
David Abrahamson, Planner

Elmore County Consultants:

Elizabeth Allen, Consulting Planner, HDR Engineering
Cindy Liles, Consulting Solid Waste Facility Engineer, HDR Engineering
Angie Michaels, Consulting County Engineer, Engineering with a Mission

Zoning Designation: Heavy Industrial/Manufacturing (M2) with a Wildland Urban Interface (WUI) Overlay.

Parcel Number: RP02S04E020010 (“Site”)

Property Size: 122.34 acres

Location/Site: The subject land and property is described as Township 2 South, Range 4 East, Section 2 Lots 1 & 2 S ½ NE ¼ B.M. The Site, Parcel RP02S04E020010, has not been addressed.

Notification: The Public Workshop was advertised in the Mountain Home Newspaper on March 18, 2026. The purpose of this Public Workshop is to discuss the Conditional Use Permit (“CUP”) with Master Site Plan (“Application”) review to date with the Planning and Zoning Commission (“Commission”) and receive their feedback before proceeding with the public hearings for the proposal. A Hillside Development application and a Development Agreement have been processed concurrently with this Application.

Exhibits of the Record: The documents and exhibits referenced in the Application record are numbered sequentially. This staff report references the following portions of the Application record, which are included as Exhibits. The electronic record is maintained by the Department, which is the authoritative source of these Exhibits and shall take precedence if any inconsistencies exist in other paper or otherwise kept or maintained versions of the Exhibits.

1. Initial Application – May 15, 2025
2. Initial Completeness Determination
 - a. Completeness Determination – June 21, 2025
 - b. Applicant Response to Completeness Determination – August 7, 2025
3. IDEQ Siting Review
 - a. Siting Completeness Determination and Next Steps – June 3, 2025
 - b. IDEQ Siting Approval – August 7, 2025
4. Application Resubmittal
 - a. Application – December 19, 2025
 - b. Department resubmittal follow-up email – January 14, 2026
 - c. Applicant resubmittal response – January 20, 2026
5. Development Agreement Application – February 5, 2026
6. Completeness Determination: Complete – February 19, 2026

SITE AND AREA DETAILS

The Site is located approximately 14 miles northeast of the City of Mountain Home and includes 122 acres of land zoned Heavy Industrial/Manufacturing (M2). Parcels to the north, west, and south are zoned M2, while those to the east are zoned General Agricultural (Ag). Properties in the vicinity are primarily undeveloped. Industrial uses located along Simco Road include the railroad, Larson-Miller Medical Waste Disposal Service, US Ecology Idaho Rail Transfer Facility, Simco Boat & RV Storage, and the Pacific Steel Mayfield Recycling Shredder. The Site is in the Simco Road District, as outlined in Chapter 13 – Community Design for the Simco Road District.

REQUEST

Great West Engineering, on behalf of Pacific Hide & Fur Depot dba Pacific Steel and Recycling (“Applicant”), requests the approval of a CUP for a Non-Municipal Solid Waste Landfill (“NMSWL”) facility for an Auto Shred Residue (“ASR”) material repository (“Repository”) outlined in yellow in Image 1.

Image 1. Aerial image of the Site and the existing Pacific Steel Shredder



The Repository would receive only ASR generated at the Applicant's existing Pacific Steel Mayfield Recycling Shredder ("Shredder"), located approximately 2.3 road miles south of the Site, outlined in red in Image 1. Elmore County approved the Shredder in 2007, which provides scrap, commercial, consumer, and e-recycling services. ASR consists of fine metalics, plastics, and glass that are sorted during recycling.

The ASR would be hauled by semi-trucks from the Shredder to the Site, which would travel approximately 1 mile west along NW Waste Site Drive, approximately 0.9 mile north along Simco Road, and approximately 0.4 mile east along E. Flick Lane to the Site. A 60-foot wide, 2175-foot long permanent access easement is provided along E. Flick Lane to the entrance of the Site.

At full buildout, the Repository would encompass 82.9 acres, with a 200-foot setback from property lines. Development would occur in 11 phases, beginning in the northwest corner of the Site (Phase 1) and concluding in the southeast (Phase 11). Waste placement is not anticipated to exceed 50 feet below the existing grade, and the top of the overall waste fill is expected to be approximately 96 to 108 feet above the existing grade. Each phase would be closed in accordance with Idaho Department of Environmental Quality (IDEQ) requirements, including a minimum of 6 inches of topsoil seeded with native plant species.

Each ASR repository cell would be lined with a high-density polyethylene (HDPE) synthetic liner and a leachate collection system that would transmit water from the repository cells to a double-lined leachate evaporation pond. Interim stormwater ponds would be constructed for the phases to collect stormwater until the waste areas are elevated above the perimeter road, at which point the stormwater would drain directly to the permanent stormwater pond. Individual phases would include construction of the perimeter road segment and the corresponding lined cell, which would be filled, capped, and closed before advancing to the next phase. Leachate would be drained from the cell to a sump that drains to the leachate pond.

A perimeter road and run-off control ditch would run along the boundary of the waste footprint. A permanent stormwater pond and double-lined leachate pond would be located in the southwest portion of the Subject Property. A 60-foot by 40-foot office and shop, with an associated well and drain field, is proposed near the northwest entrance. Stormwater collected within the repository cells would be detained in a stormwater pond sized to hold the 100-year, 24-hour storm event.

Facility security would include a 7-foot chain-link fence consisting of 6 feet of fencing and 1 foot of three-strand barbed wire at a 45-degree outward angle, to be expanded as phases progress.

The facility would not be open to the public and would operate Monday through Friday from 8:00 a.m. to 5:00 p.m. Per day, the Repository would be staffed by two employees and is expected to receive up to 10 semi-truckloads, each carrying approximately 20 to 25 tons of ASR. Operational noise would be limited to one to two pieces of heavy equipment, placing ASR and managing cover material. Dust would be controlled through water-truck application.

The Applicant has agreed to secure a service agreement with the Metro Rural Fire Department, which intends to provide fire protection services upon start of operations, contingent on finalizing the agreement and receiving CUP and Development Agreement Approval. The Applicant also proposes installing a 30,000-gallon fire cistern for fire suppression.

The Application includes an Operations Plan for the proposed use, intended as a guidance document to ensure operations and maintenance are in compliance with State and Federal rules and regulations. The plan discusses repository design, hours of operation, landfill personnel, waste accounting, repository buildings, facility design, operation considerations, vector/odor/litter control, air quality criteria, control of public access, stormwater control, recordkeeping procedures, other operational considerations, fire and safety programs, dust and noise programs, facility maintenance, surface water drainage, leachate collection system, and operations and maintenance tasks.

The Applicant has submitted a Tier III Processing Facility siting application to IDEQ, which the agency approved on August 7, 2025. The next steps that the Applicant is required to take are to submit a Preliminary Design Report and Operations Plan for the facility to

IDEQ. No waste would be accepted at the facility until both the design application and the operation plan are approved by the agencies and the CUP is approved.

DEVELOPMENT REVIEW PROCESS

The Application was reviewed per the following Elmore County Amended Zoning and Development Ordinance sections:

- Title 7 Zoning and Development, Chapter 2 Land Use Tables, Zoning Districts, and their Base Densities, Overlay Districts and Boundaries;
- Title 7 Zoning and Development, Chapter 3, Application Procedures and Fees
- Title 7 Zoning and Development, Chapter 5 Areas of Critical Concern and Hillside Development Requirements;
- Title 7 Zoning and Development, Chapter 9 Conditional Use Permit (CUP) Standards and Requirements;
- Title 7 Zoning and Development, Chapter 10 Development Agreement (DA) and/or Agreements Standards and Requirements;
- Title 8 Public Health and Safety, Chapter 1 Fire Prevention and Wildfire Mitigation Standards and Regulations Applying to All Districts;
- Title 8 Public Health and Safety, Chapter 5 Solid Waste Facilities; and
- Title 10 Subdivision, Chapter 6 Master Site Plan Requirements

The following Application requirements are fulfilled for this proposal pursuant to §7-3:

- On November 14, 2024, the Applicant had a pre-application meeting with the Land Use and Building Department (the “Department”).
- The Applicant conducted neighborhood meetings on January 30 and February 1, 2025. On January 15, 2025, the Applicant sent letters to neighboring property owners within a five-mile radius, per Zoning Ordinance §7-3-3(B), including the date, time, and location of the meetings.

The Application was submitted to the Land Use and Building Department (“Department”) on February 27, 2025, per Zoning Ordinance §7-9-3. On March 5, 2025, the Department requested that the Application materials be reorganized for clarity. The Applicant submitted the reorganized Application on May 15, 2025. Upon review of this submittal, the County Review Team issued a Completeness Memo on June 23, 2025, deeming the Application incomplete.

The Department conducted an agency meeting on July 31, 2025, with governing agency representatives to discuss the proposed project. No comments or concerns about the request were raised by the agencies.

The Applicant submitted an amended Application on December 19, 2025, additional clarifying information on January 20, 2026, and the Development Agreement application on February 5, 2026. Upon review of this submittal, the County Review Team issued a Completeness Memo on February 19, 2026, deeming the application complete.

Preliminary Findings for Conditional Uses Per Zoning Ordinance §7-9-7(A)

- 1. The proposed use shall, in fact, constitute a Conditional Use as determined in Chapter 2, Table §7-2-26 (B), Elmore County Land Use Table, as contained in this Ordinance;**

Application Details: The Applicant provided an analysis of Table §7-2-26(B) and determined that the proposed use constitutes a Conditional Use.

Staff Response: The Site is located on approximately 122.34 acres of land that is zoned M2. The use is a Non-Municipal Solid Waste Facility, which falls under the use of Solid Waste Disposal Facilities/Landfill, as outlined in §7-2-26(B) Elmore County Land Use Table, which is permitted in the M2 zone with the approval of a CUP.

- 2. The proposed use shall be in harmony with and in accordance with the Elmore County Comprehensive Plan and this Ordinance;**

Application Details Comprehensive Plan: The Applicant provided an analysis of the Elmore County 2014 Comprehensive Plan (“Plan”)

Staff Response Comprehensive Plan: The Plan designates the Site as M2 on the Future Land Use Map. The Site is in the Simco Road District, as outlined in Chapter 13 – Community Design for the Simco Road District. The Plan provides the following guidance with which the proposal is in alignment:

- Economic Objective 6: *Encourage and support heavy industrial development to locate in the vicinity of the Simco Road District.*
- Land Use Objective 13: *Allow heavy industrial/manufacturing land uses and waste facilities to locate in the Simco Road District subject to specific review and Condition Use Permits.*
- Air Quality Objective 3: *Encourage heavy industrial uses to located in the Simco Road District.*
- Hazardous Area Objective 1: *Recognize that the Simco Road District may be a suitable location for waste handling and processing, and industrial activities, subject to detailed engineering studies and technical analysis which document environmental and land use compatibility.*

- Simco Road District Goal 5:
 - *Encourage new development to comply with the County Comprehensive Plan.*
 - *Continue to locate Heavy Industry in the Simco Road District.*
 - *The intent of the Simco Road District Heavy Industrial Zoning is to reserve land for heavy industry and job creation following a detailed CUP procedure.*

Application Details Ordinance: The Applicant stated that the proposed use will comply with all applicable County ordinances.

Staff Response Zoning Ordinance: The applicable portions of the Zoning Ordinance include Title 7, Chapters 2, 3, 5, 6, 9, and 10; Title 8, Chapter 1 and 5; and Title 10, Chapters 5, 6, 7, and 8. As explained below, the applicable portions of the Zoning Ordinance are met or will be met by conditions of approval.

- **Title 7 Chapter 2:** See Findings 1 and 3.
- **Title 7 Chapter 3:** Applicable procedures have been followed as outlined in the Development Review Process section.
- **Title 7 Chapter 5:** While the Site does not contain natural hillsides exceeding 15 percent, Hillside Development Permits are required for grading per §7-5-2(B). Grading activities of the facilities cells create slopes exceeding 15 percent. The Applicant submitted a Hillside Development Application.
- **Title 7 Chapter 6:** The Applicant is proposing limited lighting, and a lighting plan is not necessary at this time. Staff recommends the following draft condition of approval: “A light plan shall be provided to the Department prior to each phase if any lighting is proposed”.
- **Title 7 Chapter 9:** See Findings 1-11 for compliance with Conditional Use Permit requirements.
- **Title 7 Chapter 10:** A Development Agreement has been submitted by the Applicant, and a draft will be provided at the time of the Planning and Zoning Commission Public Hearing.
- **Title 8 Chapter 5:** See Finding 3 below.
- **Title 10:** See Master Site Plan Findings in this report.

3. The proposed use complies with the purpose statement of the applicable base zone and with the specific use standards as set forth in this Chapter 2 Title 7;

Application Details: The Application materials include a statement that the proposed use complies with the purpose statement of the M2 zoning district.

Staff Response: The Zoning Ordinance provides the purpose statement for the M2 Zoning District in §7-2-5(G), stating “*The purpose of the M2 district is to manage the development and location of heavy industry. If requested by the Director, Commission or the Board, may be required to include and authorize a Memorandum of Understanding (MOU), which will specify certain required steps leading to the process of evaluating and developing. The Heavy Industrial designation is specifically established for heavy manufacturing and processing industries*”. A Solid Waste Disposal Facility/Landfill complies with the purpose statement of the M2 zone, which is established to support heavy industry uses.

The Zoning and Development Ordinance requires Solid Waste Facilities to meet the standards outlined in §8-5-4 Solid Waste Facilities, outlined below:

§8-5-4 (A.a) – The Applicant has proposed uses that are allowed in the M2 zoning district as outlined in Table 7-2-26(B) with the approval of a Conditional Use Permit.

§8-5-4 (A.b) – The Applicant has submitted a Hillside Development application to comply with hillside development requirements.

§8-5-4 (A.c) – The Applicant has proposed providing defensible space; clearing weeds; and managing flammable materials, cistern, and employee fire training to provide compliance with the Wildland Urban Interface. The Applicant has an agreement to enter into an agreement with Metro Rural Fire Department for fire protection services.

§8-5-4 (A.d) – The Applicant has submitted a Master Site Plan along with this Application that shows that no structures are located within 200 feet of the Site’s property lines. The required 1000-foot setback from any residential dwelling is not applicable to this project as no residential dwelling units are within 1,000-feet of the site.

§8-5-4 (A.e) – A Hillside Development application was submitted that includes details about preliminary grading, a slope stabilization and revegetation plan and report, engineering hydrology report, soil engineering report, engineering geology report, and visual impact report.

§8-5-4 (A.f) – The Site is not within a floodplain; this standard is not applicable.

§8-5-4 (A.g) – The Applicant has provided information in the narrative and Master Site Plan explaining that secure perimeter fencing with access for Emergency Services is to be provided.

§8-5-4 (A.h) – The Applicant has provided hours of operation of Monday through Friday, 8:00 am – 5:00 pm.

§8-5-4 (A.i) – The Applicant shared that the facility is required to provide closure and post-closure requirements in accordance with IDEQ Solid Waste Rules.

§8-5-4 (A.j) – The Applicant has provided information indicating that the existing uses are in compliance with all applicable local, state, and federal requirements and has explained that the facility is being licensed as an NMSWM facility with IDEQ.

§8-5-4 (A.k) – The Applicant has explained that litter will be mitigated with a portable litter screen and a perimeter fence, in addition to regularly gather litter.

§8-5-4 (A.l) – The Applicant has provided information that signage will be provided to meet signage requirements.

§8-5-4 (A.m) – The Applicant has provided information that the facility will only accept ASR and that no hazardous or industrial waste will be accepted.

§8-5-4 (A.n) – The Applicant has provided information that the facility complies with this standard; the Site will be kept secure from unauthorized entry through the use of secure perimeter fencing and surveillance.

§8-5-4 (A.o) – The Applicant has explained that the facility will keep records of the amount of ASR disposed of in the facility.

§8-5-4 (A.p) – The Applicant has explained that all materials will be weighed at the Shredder facility prior to being moved to the repository.

§8-5-4 (A.q) – The Applicant has explained that all loads will be weighed prior to leaving the Shredder facility.

§8-5-4 (A.r) – The Applicant has explained that the operator's records will be made available for inspection.

§8-5-4 (A.s) – The Applicant explained that dust will be mitigated with the use of a combination of watering roads and road amendments.

§8-5-4 (A.t) – No heavy machinery is proposed for use outside of the permitted business hours.

4. The proposed use shall comply with all applicable County Ordinances;

Application Details: The Applicant stated that the proposed use will comply with all applicable County ordinances.

Staff Response: Compliance with the Zoning Ordinance, Titles 7, 8, and 10 is discussed in Finding 2 above. Other Zoning Ordinance Titles include Title 9, Building Regulations, which will be reviewed separately as each phase of the facility development, and nothing in the approval of the CUP would act in lieu of building permits or prevent the ability to apply Building Regulations. The proposed use was

discussed with affected agencies, including Elmore County agencies, on July 31, 2025. Additional agency coordination will occur leading up to the Public Hearing for the project. Coordination with the Elmore County agencies potentially impacted by the proposal includes:

- Elmore County Engineer
- Elmore County Sheriff
- Elmore County Ambulance District
- Mountain Home Highway District

Coordination with these agencies will continue leading up to the Planning and Zoning Commission Public Hearing. Approval of the CUP would not override any Elmore County Ordinance or prevent Elmore County from ensuring compliance with any Ordinance not herein identified.

5. The proposed use shall comply with all applicable State and Federal regulations;

Application Details: The Applicant has submitted a Tier III Processing Facility siting application to IDEQ, which the agency approved on August 7, 2025. The next steps that the Applicant is required to take are to submit a design application and Operations Plan for the facility to IDEQ.

Staff Response: The proposed use was discussed with affected agencies on July 31, 2025, during which no agencies had comments or concerns. Coordination will continue as needed with state and federal agencies. Comments from these agencies will be incorporated into the Planning and Zoning Commission public hearing staff report. No waste would be accepted at the facility until both the design application and the operation plan are approved by the agencies and the CUP is approved.

6. The proposed use shall be designed, constructed, operated, and maintained in such a way as to be harmonious and appropriate in appearance with the existing or intended character of the general vicinity; and that such use shall not change the essential character of the said area The proposed use shall be designed, constructed, operated, and maintained in such a way as to be harmonious and appropriate in appearance with the existing or intended character of the general vicinity; and that such use shall not change the essential character of the said area;

Application Details: The Applicant explained that the facility would be designed with gentle slopes and seeded with a native seed mixture at closure to blend in with the surrounding area.

Staff Response: The Site is located within Simco Road District, designated as M2, an industrial zoning district. The surrounding area consists of undeveloped livestock grazing land and established industrial uses. Given the existing and planned

industrial nature of the vicinity, the proposed use as proposed would be compatible with and appropriate for the area's intended character.

The proposal has undergone a comprehensive review and will be conditioned to make sure that the proposed use is designed, constructed, and maintained in a manner that is harmonious and appropriate in appearance with the existing and planned character of the area.

7. The proposed use shall not be hazardous or disturbing to existing neighboring uses or impede their normal development;

Application Details: The Applicant explains that the facility would not have hazardous material. They have proposed that environmental controls would be put in place to protect groundwater, surface water, and air quality.

Staff Response: As noted above in Finding 6, existing neighboring uses consist primarily of undeveloped land and established industrial uses. The Future Land Use Map designates the area for M2 and M1 uses. The proposed use is consistent with the future land-use designations.

8. The proposed use shall be served adequately by available public facilities and services such as highways, streets, police and fire protection, drainage structures, refuse disposal, water, sewer, or that the person responsible for the establishment of the proposed conditional use shall be able to provide adequately any such services;

Application Details:

Highways and Streets. The Site is accessed via Flick Lane, an approved private road. During operations, trucks will travel between the Pacific Steel ASR facility and the Site using Simco Cutoff Road, Simco Road, and Flick Lane. Traffic impacts are expected to be minimal, with the facility receiving up to 10 semi-trucks per day and only two employees on-site. The Applicant states that traffic on Simco Road would not increase as a result of this proposed use, since it would consist of existing traffic leaving the Shredder to transfer ASR materials to other locations.

Police and Fire Protection. The Application materials state that the Applicant will work with the sheriff's department for security and that emergency services would consist of paramedics and fire. The Applicant has agreed to enter into an agreement with the Metro Rural Fire Department to provide fire protection services upon the commencement of operations, subject to the agreement's completion. In addition, the Applicant proposes installing an on-site cistern for fire suppression.

Drainage Structures. As explained by the Applicant, the Site is relatively flat. As the Site is developed, modifications will be made to achieve proper drainage, and stormwater from the facility will be directed to stormwater ponds.

Refuse Disposal. The Applicant did not provide any details about refuse disposal.

Water and Sewer. The Applicant is proposing that the maintenance building be served by individual well and septic.

Staff Response:

Highways and Streets. The Site is located within Mountain Home Highway District (“MHHD”); MHHD has not participated in the Development Review process to date and has not provided any comments to the Department. The proposed use would require adequate service by highways and streets. The Department will reach out to MHHD to request formal comment prior to the Public Hearing.

Police and Fire Protection. The Site is served by the Elmore County Sheriff, and the Department has not received any comments regarding this request. The Department will continue to coordinate with the Elmore County Sheriff on any mitigation needed. The Department will work with the Rural Metro Fire to further define what on-site elements are needed for fire protection.

Drainage Structures. The proposed use will be adequately served by drainage structures. As explained by the Applicant, the Site is relatively flat. As the Site is developed, modifications will be made to achieve proper drainage, and stormwater from the facility will be directed to stormwater ponds.

Refuse Disposal. The area is served by Republic Services. Pacific Steel will be responsible for disposing of refuse generated during construction, operation, and closure of the repository. No concerns regarding refuse disposal have been identified that would affect the project's feasibility.

Water and Sewer. The Maintenance Building will be served by an individual well and septic system, both designed and installed in compliance with applicable agency requirements.

- 9. The proposed use shall not create excessive additional requirements at public cost for public facilities and services and the proposed use shall not be detrimental to the economic welfare of the County;**

Application Details: The Application materials state that public facilities would not change as part of this proposed use.

Staff Response: The Department has not received comments from agencies regarding any additional requirements that would be at public cost. The Department will continue to coordinate with agencies as the project proceeds.

- 10. The proposed use shall not involve uses, activities, processes, materials, equipment, and conditions of operation that will be detrimental to any persons, property, or the general welfare by reason of excessive production of traffic, noise, smoke, fumes, glare, or odors;**

Application Details:

Traffic. See Finding 8 above for an analysis of traffic.

Noise. As explained in the Application, operational noise would be limited to heavy equipment used during working hours (8:00 a.m. to 5:00 p.m., Monday through Friday). Short-term construction noise is expected, but the Applicant proposes using muffler systems to reduce noise levels during this period. The Applicant's Environmental Assessment analyzed noise and found that no known noise receptors are near the Site that would be affected during normal repository operation.

Smoke. As explained in the Application, no smoke would be emitted from the Site, and no burning would be allowed.

Fumes and Odors. The Applicant has explained that fumes and odors on the Site would be minimal since ASR is non-hazardous and relatively dry.

Glare. The Applicant has not provided information on whether there would be excessive glare.

Staff Response:

Noise. Staff will draft a condition of approval to address noise impacts.

Smoke. Staff will draft a condition of approval to address smoke impacts.

Fumes and Odors. Staff will draft a condition of approval to address fumes and odors.

Glare. Based on the Application materials, there are no activities that would create glare requiring mitigation.

11. The proposed use shall not result in the destruction, loss, or damage of a natural or scenic feature of major importance;

Application Details: The Application materials indicate that the development of the Site would not result in the destruction, loss, or damage of a natural or scenic feature of major importance. As explained in the Application materials, the Site has soils classified as "Prime Farmland if Irrigated," and the Site is not currently irrigated.

Staff Response: Development of the Site would remove approximately 122 acres of Prime Farmland. The Site is zoned M2, a heavy-industrial designation that expressly supports uses such as materials processing, storage, and other industrial operations. This zoning reflects a policy decision that the area is not intended for long-term agricultural preservation but for industrial development.

Preliminary Findings for Master Site Plan Per Zoning Ordinance §10-6-7(A)

1. The Master Site Plan complies with the applicable Comprehensive Plan; and

Staff Response: Please refer to Conditional Use Permit Finding 2 above.

2. When applicable, the master site plan complies with Section 10-6-4 General Required Standards; in regard to:

a. Location of Structures on Site; and

Application Details: The Applicant provided a Master Site Plan that shows the placement of all structures, parking areas, and screening.

Staff Response: Staff has not identified that any additional information is needed at this time, but additional information may be requested prior to the public hearing if deemed necessary.

b. Non-Vehicular Access and Internal Circulation;

Application Details: As explained in the Application materials, all internal circulation would be vehicular, with no pedestrian access, and pedestrian circulation would be permitted on the Site. The facility would not be open to the public.

Staff Response: Staff has not identified that any additional information is needed at this time, but additional information may be requested prior to the public hearing if deemed necessary.

c. Automobile Access and Internal Circulation;

Application Details: The ASR would be hauled by semi-trucks from the Shredder to the Site, traveling approximately 1 mile west along NW Waste Site Drive, approximately 0.9 mile north along Simco Road, and approximately 0.4 mile east along E. Flick Lane. A 60-foot wide, 2175-foot-long permanent access easement is provided along E. Flick Lane to the entrance of the Site.

During operations, trucks will travel between the Pacific Steel ASR facility and the Site using Simco Cutoff Road, Simco Road, and Flick Lane. According to the Applicant, traffic impacts are expected to be minimal, with the facility receiving up to 10 semi-trucks per day and only two employees on-site.

An internal 24-foot-wide entrance road and perimeter road would be used to access each phase of the facility. The perimeter road and entrance road would be constructed with a 12-inch $\frac{3}{4}$ -inch minus crushed surface on top of an 8-ounce non-woven fabric, above compacted subgrade, to a minimum of 95 percent of the standard proctor. A 5-foot run-off control ditch would be located adjacent to the perimeter road.

Staff Response: The Site is located within Mountain Home Highway District (“MHHD”); MHHD has not participated in the Development Review process to date and has not provided any comments to the Department. The proposed use

would require adequate service by highways and streets. The Department will reach out to MHHD to request formal comment prior to the Public Hearing.

The Site is accessed via Flick Lane, an approved private road. Prior to any approval, the Applicant paved Flick Lane from the intersection with Simco Road to the west edge of the Site. The paving would need to be extended to the Site's eastern property line. Staff will draft a condition of approval to address this item.

d. Additional Off-street Parking Design Standards;

Application Details: The Applicant is proposing 2 employees who would require 2 standard parking stalls. Standard parking stalls are proposed to be constructed of gravel, except for ADA parking stalls that would be constructed of concrete. As shown on the Master Site Plan and explained in the Application materials, the Applicant is proposing a 24-foot-wide drive aisle and the following parking stalls.

Type	Quantity	Length	Width	Angle	Aisle Width
Standard	2	20 feet	10 feet	90 degrees	N/A
ADA Standard	2	20 feet	12 feet	90 degrees	66 inches

Staff Response: The Applicant would be required to meet all parking requirements, and the Department would approve a final parking plan at the time of the building permit for the Maintenance Building. Staff will draft a condition of approval to address this item.

Per Table §10-8-4 of the Elmore County Subdivision Ordinance, a parking stall with a 90-degree parking angle is required to be 9 feet wide with a depth of 20 feet and either a 22-foot-wide one-way driving aisle or a 25-foot-wide two-way driving aisle. Table §10-8-5 provides the required number of parking stalls per use; a solid waste disposal facility/landfill requires 1 standard parking stall for every 2 employees. Table §10-8-6 provides the required number of accessible parking spaces (“ADA”). A use that provides 1 to 2 standard parking stalls must provide 2 ADA parking stalls, consisting of 1 van-accessible parking stall with a minimum 96-inch-wide access aisle and 1 accessible parking stall with a 60-inch-wide access aisle. Off-street parking stalls must be improved with hot or cold-mixed asphalt concrete, not less than 3 inches thick.

3. The applicant has submitted a natural features analysis compliant with section 10-6-5 indicating that the proposed development and master site plan sufficiently address:

a. Any natural constraints detected or observed; and

Application Details: The Applicant's Environmental Assessment report included an analysis of floodplains, wetlands, and water resources. The report found that a 100-year floodplain, wetlands, and surface waters are not located on the Site.

The report also found that the construction of the repository would not contact or interfere with uppermost groundwater and that the repository would be constructed with IDEQ-approved liner systems and groundwater monitoring to mitigate any impacts to groundwater.

The report found that the Site does not contain surface waters and therefore no consequences or mitigation measures for surface waters were identified.

Staff Response: The natural features analysis provided by the Applicant did not detect any natural constraints. Hydrology, soils, topography, and vegetation are adequately addressed through the Master Site Plan.

b. Historical and Cultural Resources; and

Application Details: The Applicant's Environmental Assessment report included a Class III Cultural Resources Survey report. No cultural resources were identified as a result of this survey, and therefore, no consequences were identified. The report states that "If cultural materials are discovered during construction, work will be halted and the Idaho State Historic Preservation Office (SHPO) would be contacted to perform further investigations. The Resident Project Representative, provided by the Engineer, would have instruction and authority to shut down construction operations if any cultural material is found during the work."

Staff Response: The Class III Cultural Resources report provided adequate information regarding the lack of cultural resources on the Site. Staff will draft a condition of approval addressing inadvertent discovery of cultural resources.

c. Sensitive Plant and Wildlife Species; and

Application Details: The Applicant's Environmental Assessment report included an analysis of biological resources. The report used the United States Fish and Wildlife Service (USFWS) Official Special List to identify sensitive species. The report identified one Listed Threatened species, Slickspot Peppergrass, and two species Proposed for Listing, Monarch Butterfly and Cuckoo Bumble Bee, as species that may occur on the Site or may be affected by the proposed use. The nearest critical habitat is for Slickspot Peppergrass and is located within 1.5 miles of the Site. No mitigation is proposed for the Monarch Butterfly, Cuckoo Bumble Bee, or Slickspot Peppergrass.

The species list also notes that bald and/or golden eagles may pass through the Site. No nesting Sites or habitats have been identified on the Site. As explained in the report, if either species is found to be present during construction,

construction would likely pause to allow agencies to monitor their behavior. The Applicant has stated in the Master Site Plan narrative that they will not prepare a Bird/Eagle Conservation Plan.

The Application includes email correspondence with the USFWS, which recommended a Stage 1 survey for Slickspot Peppergrass on the Site. If Slickspot Peppergrass was identified on the Site, USFWS would appreciate the opportunity to work with the Applicant to avoid or minimize impacts to the species and its habitat while also meeting the needs of the project. USFWS noted a reasonable chance that Slickspot Peppergrass may be present on the Site due to the proximity of occurrences and the presence of an uncultivated area. The Department supports the USFWS recommendation. The Applicant has stated in the Master Site Plan narrative that they will not provide mitigation for slickspot peppergrass if it is encountered.

Staff Response: According to the Applicant's sensitive plant and wildlife species analysis, no critical habitats were identified on the Site. Based on the U.S. Fish and Wildlife Service Official Species List, a listed threatened species, slickspot peppergrass, and a candidate species, monarch butterfly, were identified as species known to occur in the general vicinity of the Site. The Applicant has stated in the Master Site Plan narrative that they will not provide mitigation for slickspot peppergrass if it is encountered, nor will they prepare a Bird/Eagle Conservation Plan.

d. Any impacts on Natural Features

Application Details: The Applicant's Environmental Assessment analyzed how air quality may be impacted by increased levels of airborne dust particulates from earthwork, activities during repository construction, and traffic related to construction. Mitigation proposed includes Best Management Practices, such as dust suppression. Dust emissions are proposed to be controlled and managed by a fugitive dust control plan. Impacts are anticipated to be short-term.

Staff Response: Staff will draft a condition of approval to address this item.

4. The master site plan complies with section 10-6-6 Other required standards; in regard to:

a. Screening; and

Application Details: Facility security would include a 7-foot chain-link fence, consisting of 6 feet of fencing and 1 foot of three-strand barbed wire at a 45-degree outward angle, to be expanded as phases progress.

Staff Response: Staff has not identified that any additional information is needed at this time, but additional information may be requested prior to the public hearing if deemed necessary.

b. Drainage; and

Application Details: A series of interim stormwater ponds corresponding to each phase would be constructed. As the phases progress, an adjacent perimeter ditch and road would be constructed. Upon completion of the final phase and cover, the final stormwater pond would collect all stormwater from the repository. A permanent stormwater pond and double-lined leachate pond would be located in the southwest portion of the Subject Property.

Staff Response: Staff has not identified that any additional information is needed at this time, but additional information may be requested prior to the public hearing if deemed necessary.

c. Water Supply and Sewage Disposal; and

Application Details: Potable water would be provided via an individual well to serve the Maintenance Building. Drinking water services will be provided to the Maintenance Building via an individual well. The Maintenance Building will include a restroom served by a septic system.

Staff Response: All improvements to the Site would be required to meet the requirements of the Idaho Department of Water Resources and Central District Health. Staff will draft a condition of approval to address this item.

d. Filling, Excavation, and Earthmoving; and

Application Details: The Applicant has provided civil plans that include Site grading. Disturbed areas are proposed to be revegetated with native plant species. The Applicant has also submitted a Hillside Development Application for future areas that will contain slopes over 15 percent. The Application includes a preliminary grading plan, a slope stabilization and revegetation plan and report, an engineering hydrology report, a soils engineering report, an engineering geology report, and a visual impact report.

Staff Response: A Geotechnical Report has not been provided and would be required prior to the Application gaining approval

e. Irrigation Services and Delivery Systems; and

Application Details: The proposal does not modify any existing irrigation canals, ditches, or similar infrastructure. Landscape irrigation is not planned for the revegetated areas.

Staff Response: Staff has not identified that any additional information is needed at this time, but additional information may be requested prior to the public hearing if deemed necessary.

f. Utilities; and

Application Details: The Applicant proposes to locate all utilities underground. The Maintenance Building will require utility services. Leachate will be pumped from the repository cell to the leachate pond, and an underground electrical line will run from the Maintenance Building to the leachate pumps, and a force main will deliver leachate from the pumps to the leachate pond.

Staff Response: The Master Site Plan does not show on-site utilities. Staff will draft a condition of approval to address this item.

g. Maintenance; and

Application Details: The Applicant has outlined maintenance activities in their Operations Plan. They proposed that all drainage system components would be maintained by the operator. Roads would be plowed in the winter, dust mitigated with water and dust suppression chemicals in dry months, and noxious weeds would be sprayed to reduce their spread. Drainage ditches and culverts would be cleared of debris. Any flammable materials would be kept inside the maintenance building.

Staff Response: Staff will draft a condition of approval to address this item.

h. Supplemental Information, Modifications (related to existing natural features);

Application Details:

Staff Response: No additional information or modifications to the Master Site Plan related to existing natural features is recommended.

i. Alternative Master Site Plan

Application Details: The Applicant has not provided a request for alternate site development.

Staff Response: No additional information is needed.

Image 2. Site Plan

