

SUMMARY STATEMENT

Doyle v. The Harris Ranch Community Infrastructure District No. 1
Docket No. 51175

This appeal raises issues of first impression regarding the interpretation and application of the Community Infrastructure District Act (the “CID Act”), Idaho Code sections 50-3101 to 50-3121. In 2021, the Harris Ranch Community Infrastructure District No. 1 (the “Harris Ranch CID”) board of directors (the “District Board”) adopted resolutions to finance certain infrastructure projects that ultimately resulted in a higher tax burden on the district’s residents. The District Board solicited and reviewed comments from the district’s residents before these resolutions were adopted; however, the meeting to approve these resolutions was closed to the public.

William Doyle, Lawrence Crowley, and the Harris Ranch CID Taxpayers’ Association (collectively, the “Residents”) filed an action against the Harris Ranch CID in the district court, arguing that the District Board’s adoption of the resolutions violated the CID Act and the Idaho and United States constitutions. The Residents also sought to augment the record to include records from the formation of the Harris Ranch CID and the election granting the District Board authority to incur indebtedness and issue general obligation bonds in 2010. Ultimately, the district court ruled in favor of the Harris Ranch CID, concluding that certain arguments raised by the Residents were either barred under the CID Act’s statute of limitations, Idaho Code section 50-3119, or waived under Idaho’s preservation doctrine. The district court rejected the Resident’s remaining arguments on the merits.

Residents timely appealed to the Idaho Supreme Court. They maintained that the resolutions violate the CID Act and the Idaho and United States Constitutions. They further argued that the district court erred when it denied their motion to augment the record and applied the preservation rule because they were not provided the opportunity to present legal arguments and authority to the District Board.

The Idaho Supreme Court affirmed the decision of the district court. The Court agreed with Residents that the district court erred when it applied the preservation rule to Residents’ arguments and declined to augment the record. The Court explained that it would be inequitable to require Residents to abide by the preservation doctrine because, in contrast to other land use decisions or proceedings under the Idaho Administrative Procedure Act, the CID Act does not contain the hallmarks of proceedings where the preservation rule is typically applied, such as requiring a formal contested hearing or notice. The Court concluded, however, that this error was harmless because the district court correctly determined that the Residents’ attack on the formation of the CID and the election in 2010 was time barred under Idaho Code section 50-3119. Next, the Court rejected the Residents’ remaining argument that the resolutions violated the CID Act or the Idaho and United States constitutions.

******This summary constitutes no part of the Court’s opinion. It has been prepared by court staff for the convenience of the public.******