

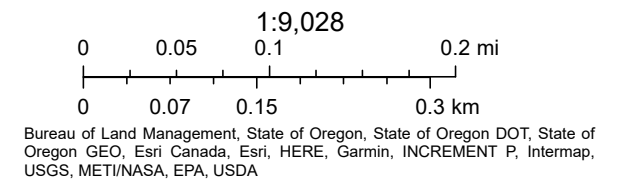
Canyon County, ID Web Map



4/3/2026, 9:52:56 AM

- Multiple Parcel Search _Query result
- Quarter Line
- CanyonCountyRoads
- Roads
- CC_PrivateRoads
- Blue: Band_3
- Red: Band_1
- Green: Band_2

Imagery_2025_2026



Canyon County, ID

Bureau of Land Management, State of Oregon, State of Oregon DOT, State of Oregon GEO, Esri Canada, Esri, HERE, Garmin, INCREMENT P, Intermap, USGS, METI/NASA, EPA, USDA | City of Nampa |



APPEAL OF DECISION

APPLICATION

APPELLANT	NAME: Charles L. Cupp and Sierra J. Cupp	
	MAILING ADDRESS: 18995 Chicken Dinner Road, Caldwell, ID	
	PHONE: [REDACTED]	EMAIL: [REDACTED]
Property owner: ☒ Other Appellant: ☐		
Signature: <u>[Signature]</u> Date: <u>4/2/2026</u>		

REPRESENTATIVE: IF DIFFERENT FROM THE APPELLANT	NAME: Julie K. Fischer and Daniel Goodman	
	COMPANY NAME: Morrow & Fischer, PLLC	
	MAILING ADDRESS: 4 Ogden Ave, Nampa, ID 83651	
	PHONE: [REDACTED]	EMAIL: [REDACTED]

SITE INFO	STREET ADDRESS: 18995 Chicken Dinner Road
	PARCEL NUMBER: R36586010B
	PARCEL SIZE:

CASE NUMBER OF REQUESTED APPEAL:	
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FOR DSD STAFF COMPLETION ONLY:

CASE NUMBER	<u>ADR2026-0001</u>	DATE RECEIVED:	<u>4/3/26</u>
RECEIVED BY:	<u>MG</u>	APPLICATION FEE:	<u>\$1,100</u> <u>CK</u> <u>CC</u> CASH



Canyon County Development Services
111 North 11th Avenue, #310
Caldwell, Idaho 83605
www.canyoncounty.id.gov
208-454-7458

AFFIDAVIT OF LEGAL INTEREST

I, Charles L. Cupp 18995 Chicken Dinner Rd.
(name) (address)
Caldwell Idaho 83687
(city) (state) (zip code)

being first duly sworn upon oath, depose and say:

1. That I am the owner of record of the property described on the attached application and I grant my permission to

Julie K. Fischer & Daniel Goodman 4 Ogden Ave., Nampa, ID 83651
(name) (address)

to submit the accompanying application pertaining to the subject property.

2. I agree to indemnify, defend and hold Canyon County and its employees harmless from any claims to liability resulting from any dispute as to the statements contained herein or as to the ownership of the property, which is the subject of the application.

Dated this 2 day of April, 20 26.

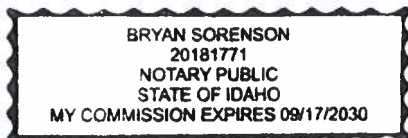
[Signature]
(signature)

STATE OF IDAHO)

ss

COUNTY OF CANYON)

On this 2 day of April, in the year 20 26, before me Bryan Sorenson,
a notary public, personally appeared Charles L. Cupp, personally known
to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that
he/she executed the same.



Notary: [Signature]

My Commission Expires: 9/17/2030



APPEAL OF DECISION APPLICATION

APPELLANT	NAME: Mark C. Morgan and Michelle R. Morgan	
	MAILING ADDRESS: 18993 Chicken Dinner Road, Caldwell, ID	
	PHONE: [REDACTED]	EMAIL: [REDACTED]
Property owner: ☒ Other Appellant: ☐		
Signature: <u><i>Mark Morgan</i></u> Date: <u>4/2/26</u>		

REPRESENTATIVE: IF DIFFERENT FROM THE APPELLANT	NAME: Julie K. Fischer & Daniel Goodman	
	COMPANY NAME: Morrow & Fischer, PLLC	
	MAILING ADDRESS: 4 Ogden Ave, Nampa, ID 83651	
	PHONE: [REDACTED]	EMAIL: [REDACTED]

SITE INFO	STREET ADDRESS: 18993 Chicken Dinner Road
	PARCEL NUMBER: R36595010
	PARCEL SIZE:

CASE NUMBER OF REQUESTED APPEAL:	
---	--

FOR DSD STAFF COMPLETION ONLY:

CASE NUMBER	DATE RECEIVED:
RECEIVED BY:	APPLICATION FEE: CK CC CASH



Canyon County Development Services
111 North 11th Avenue, #310
Caldwell, Idaho 83605
www.canyoncounty.id.gov
208-454-7458

AFFIDAVIT OF LEGAL INTEREST

I, Mark C. Morgan 18993 Chicken Dinner Rd.
(name) (address)
Caldwell Idaho 83687
(city) (state) (zip code)

being first duly sworn upon oath, depose and say:

1. That I am the owner of record of the property described on the attached application and I grant my permission to

Julie K. Fischer & Daniel Goodman 4 Ogden Ave., Nampa, ID 83651
(name) (address)

to submit the accompanying application pertaining to the subject property.

2. I agree to indemnify, defend and hold Canyon County and its employees harmless from any claims to liability resulting from any dispute as to the statements contained herein or as to the ownership of the property, which is the subject of the application.

Dated this 4/2 day of April, 20 26.

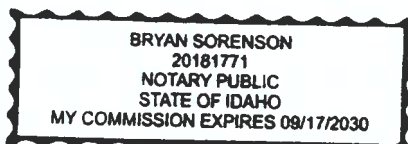
[Signature]
(signature)

STATE OF IDAHO)

ss

COUNTY OF CANYON)

On this 2 day of April, in the year 20 26, before me Bryan Sorenson,
a notary public, personally appeared Mark C. Morgan, personally known
to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that
he/she executed the same.



Notary: [Signature]

My Commission Expires: 9/17/2030



APPEAL OF DECISION APPLICATION

APPELLANT	NAME: Mark J. and Debra Flitton	
	MAILING ADDRESS: 18997 Chicken Dinner Road, Caldwell, ID	
	PHONE: [REDACTED]	EMAIL: [REDACTED]
Property owner: ☒ Other Appellant: ☐		
Signature: <u>[Signature]</u> Date: <u>4.2.2026</u>		

REPRESENTATIVE: IF DIFFERENT FROM THE APPELLANT	NAME: Julie K. Fischer & Daniel Goodman	
	COMPANY NAME: Morrow & Fischer, PLLC	
	MAILING ADDRESS: 4 Ogden Ave, Nampa, ID 83651	
	PHONE: [REDACTED]	EMAIL: [REDACTED]

SITE INFO	STREET ADDRESS: 18997 Chicken Dinner Road
	PARCEL NUMBER: R36592
	PARCEL SIZE:

CASE NUMBER OF REQUESTED APPEAL:	
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FOR DSD STAFF COMPLETION ONLY:

CASE NUMBER	DATE RECEIVED:
RECEIVED BY:	APPLICATION FEE: CK CC CASH



Canyon County Development Services
111 North 11th Avenue, #310
Caldwell, Idaho 83605
www.canyoncounty.id.gov
208-454-7458

AFFIDAVIT OF LEGAL INTEREST

I, Mark J. Flitton, 18997 Chicken Dinner Rd.
(name) (address)
Caldwell, Idaho, 83687
(city) (state) (zip code)

being first duly sworn upon oath, depose and say:

1. That I am the owner of record of the property described on the attached application and I grant my permission to

Julie K. Fischer & Daniel Goodman, 4 Ogden Ave., Nampa, ID 83651
(name) (address)

to submit the accompanying application pertaining to the subject property.

2. I agree to indemnify, defend and hold Canyon County and its employees harmless from any claims to liability resulting from any dispute as to the statements contained herein or as to the ownership of the property, which is the subject of the application.

Dated this 2nd day of April, 20 26.

[Signature]
(signature)
ss

STATE OF IDAHO)

COUNTY OF CANYON)

On this 2nd day of April, in the year 20 26, before me Lauren Buckner,
a notary public, personally appeared Mark Flitton, personally known
to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that
he/she executed the same.

Notary: Lauren Buckner

My Commission Expires: 10-14-28





APPEAL OF DECISION APPLICATION

APPELLANT	NAME: Dustin Hammons and Amber Swain	
	MAILING ADDRESS: 18999 Chicken Dinner Road, Caldwell, ID	
	PHONE: [REDACTED]	EMAIL: [REDACTED]
Property owner: ☒ Other Appellant: ☐		
Signature: <u><i>Dustin Hammons</i></u> Date: <u>4-2-26</u>		

REPRESENTATIVE: IF DIFFERENT FROM THE APPELLANT	NAME: Julie K. Fischer & Daniel Goodman	
	COMPANY NAME: Morrow & Fischer, PLLC	
	MAILING ADDRESS: 4 Ogden Ave, Nampa, ID 83651	
	PHONE: [REDACTED]	EMAIL: [REDACTED]

SITE INFO	STREET ADDRESS: 18999 Chicken Dinner Road
	PARCEL NUMBER: R36591
	PARCEL SIZE:

CASE NUMBER OF REQUESTED APPEAL:	
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FOR DSD STAFF COMPLETION ONLY:

CASE NUMBER	DATE RECEIVED:
RECEIVED BY:	APPLICATION FEE: CK CC CASH



Canyon County Development Services
111 North 11th Avenue, #310
Caldwell, Idaho 83605
www.canyoncounty.id.gov
208-454-7458

AFFIDAVIT OF LEGAL INTEREST

I, Dustin Hammons, 18999 Chicken Dinner Rd.
(name) (address)
Caldwell, Idaho, 83687
(city) (state) (zip code)

being first duly sworn upon oath, depose and say:

1. That I am the owner of record of the property described on the attached application and I grant my permission to

Julie K. Fischer & Daniel Goodman, 4 Ogden Ave., Nampa, ID 83651
(name) (address)

to submit the accompanying application pertaining to the subject property.

2. I agree to indemnify, defend and hold Canyon County and its employees harmless from any claims to liability resulting from any dispute as to the statements contained herein or as to the ownership of the property, which is the subject of the application.

Dated this 2 day of April, 20 26.

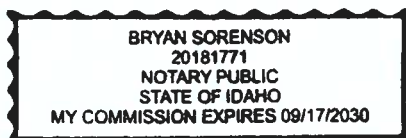
Dustin Hammons
(signature)

STATE OF IDAHO)

ss

COUNTY OF CANYON)

On this 2 day of April, in the year 20 26, before me Bryan Sorenson,
a notary public, personally appeared Dustin Hammons, personally known
to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that
he/she executed the same.



Notary: Bryan Sorenson

My Commission Expires: 9/17/2030

RECEIVED
APR 02 2026

BY: Mg

APPEAL OF DECISION CHECKLIST



GENERAL APPEAL PROCEDURE CCZO - Section 07-05-05 or 07-05-07

THE FOLLOWING ITEMS MUST BE SUBMITTED WITH THIS APPLICATION TO BE DEEMED COMPLETE (PLEASE CHECK OFF THE ITEMS REQUIRED):

Description	Applicant	Staff
Master Application completed and signed		
Letter of Intent/Statement of Reason		
Fee: \$600.00		
Fees are non-refundable		

*DISCLAIMER: The subject property shall be in compliance with the public nuisance ordinance, the building code and the zoning code before the Director can accept the application.

April 2, 2026

Canyon County Development Services
111 North 11th Ave., # 310
Caldwell, Idaho 83605

Canyon County Board of Commissioners
1115 E Albany St., Rm 1011
Caldwell, Idaho 83605

Re: Notice of Appeal: Proposed Address Number Change

Appellants: Mark C. and Michelle R. Morgan
18993 Chicken Dinner Rd
Parcel No.: R36595010

Charles L. and Sierra J. Cupp
18995 Chicken Dinner Rd
Parcel No.: R36586010B

Mark J. and Debra K. Flitton
18997 Chicken Dinner Rd
Parcel No.: R36592

Dustin Hammons and Amber Swain
18999 Chicken Dinner Rd
Parcel No. : R36591

NOTICE OF APPEAL

Pursuant to Section 06-05-23(1) and the procedures provided under Chapter 7, Articles 5 and 8, of the Canyon County Code, the above-named property owners (collectively “Appellants”) hereby Appeal the March 20, 2026 Director’s Decision letter (“Directors’ Decision”) to change the address numbers for Appellants’ respective properties located at the above-listed addresses (collectively “Properties”).¹

The Director’s Decision states that such changes will take effect in thirty (30) business days from March 20, 2026. Appellants expect the Director’s Decision to be stayed pending this Appeal. In the event the filing of this Appeal does not automatically stay the Director’s Decision, Appellants request an extension of time be applied to the thirty (30) business days deadline.

This Appeal is timely filed within fifteen (15) calendar days of the Director’s decision as required by Canyon County Code § 06-05-23(1) and associated provisions. The required filing fee is enclosed herewith.

I. BACKGROUND

Appellants are the respective owners and occupants of the Properties. The current addresses serve as both Appellants’ personal residence addresses as well as the principal business addresses for several Appellants. Appellants have maintained these addresses since at least the 1970s, have never encountered a delivery or navigation issue with respect to any private or public entity, including emergency services, and have established and currently maintain numerous business accounts, financial relationships and legal trusts registered to and reliant upon the Properties’ respective current address numbers.

On or about March 20, 2026, the Canyon County Development Services Department issued the Director’s Decision indicating that the County will change Appellants’ address numbers.

II. GROUNDS FOR APPEAL

A. The Director’s Authority to Renumber Existing Addresses is Limited to Specific, Enumerated Circumstances Not Met Here.

The sole basis upon which the Director may renumber an existing street address is when such address is “confusing or hinders emergency personnel in locating the given address.” Canyon County Code § 06-05-17(6). This is the exclusive statutory trigger for an administrative address renumbering. The Director’s authority in this context is narrowly cabined to circumstances involving confusion or emergency services access impediments.

Yet, no such circumstances exist in this case. The current address numbers have never created any confusion to date, do not create any ambiguity within the County’s numbering grid system, and have never, nor do they now in any way, impede emergency personnel from locating each of the

¹ The Properties share a private driveway running perpendicular to Chicken Dinner Road. A map portraying the Properties, which was included with the Director’s decision letter, is attached hereto for reference.

Properties. Appellants are not aware of any documented emergency response difficulties attributable to the current address numbers despite receiving numerous emergency services over the decades, including fire, law enforcement, and medical services.

Notably, the Director's Decision fails to identify any specific instance of a safety or navigation deficiency as the basis for the proposed change. The Decision offers only speculative reasoning not based on or deriving from any particular occurrence. With thousands of packages, hundreds of guests, and dozens of service calls to the Properties over many decades, locating the respective Properties has never been an issue.

To the extent the Director's Decision is based on a desire to bring the addresses into conformity with a grid-numbering preference, rather than due to any actual confusion or emergency-access concern, such a basis falls outside the scope of authority granted by § 06-05-17(6) and cannot legally support the renumbering.²

B. The Proposed Addresses Change Would Impose Extraordinary Hardships on Appellants.

Canyon County Code § 06-05-23(2) provides that the standards of the County's addressing regulations “may be modified or varied by the board if public interest is still served and when the enforcement of the rules will result in extraordinary hardship for those affected.” While this appeal is directed at the Director's Decision under § 06-05-23(1), Appellants specifically bring to the Board's attention the extraordinary hardships that the proposed renumbering would create, which further weighs against the Director's decision and in favor of maintaining the current address numbers.

Furthermore, Appellants' current address numbers are embedded throughout extensive networks of legal, financial, and commercial relationships, including but not limited to:

1. Business accounts and banking relationships registered to the current respective addresses;
2. Professional and regulatory registrations bearing the current respective addresses;
3. Personal and business trusts for which the current addresses serve as the respective registered addresses of record;
4. Contracts, agreements, and commercial relationships that reference the current addresses;
5. Insurance policies, tax filings, and governmental registrations tied to the current addresses; and
6. Numerous other legal instruments or accounts associated with the current addresses.

Changing the address numbers would require Appellants to undertake extensive, time-consuming and costly processes of notifying and updating dozens of institutions, agencies, and counterparties.

² A mere sign at the corner of the private driveway and Chicken Dinner Road, displaying the addresses of each of the Properties, would easily resolve any speculative confusion that might otherwise result. Appellants are willing to place such a sign in compliance with Canyon County Code requirements.

Unlike a personal mailing address change, many of the foregoing relationships involve formal legal instruments requiring more than mere administrative notifications to reflect an address change. The burdens upon Appellants, were the Director's decision to take effect, are severely disproportionate to any conceivable public benefit, particularly given the absence of any demonstrated safety or navigation concern.

C. The Proposed Changes are Unnecessary to Serve the Public Interest.

Canyon County Code § 06-05-05(2) states that the purpose of the addressing ordinance is to promote public health, safety, general welfare, and convenience, specifically including: (A) coordination of street names and a numbering grid system; (B) coordination of addresses for emergency services delivery; and (C) administration and enforcement of said ordinance.

As noted above, there is no demonstrated emergency services deficiency with the current address numbers. The public interest with respect to reliable emergency response and navigational clarity is already fully served by the current address numbers. Appellants have never had any issues whatsoever in receiving mail, packages, services and visitors at the Properties under their current and respective addresses. Forcing changes that impose extraordinary hardships on Appellants without a commensurate public benefit is contrary to the balancing of interests contemplated by both the Canyon County Code, *see* § 06-05-23, and Idaho law, *see* I.C. § 67-6508(a) ("land use policies, restrictions, conditions and fees" cannot "violate private property rights, adversely impact property values or create unnecessary technical limitations on the use of property").

D. Canyon County's Relevant Ordinance Concerning Address Number Changes Violates Appellants' Due Process Rights.

The Canyon County Code correctly establishes rigorous procedural protections for changes to street names, including a public hearing before the Board and mandatory thirty (30) day mailed notice to all affected property owners. Canyon County Code § 06-05-13. Such public hearing process comports with both the Idaho Administrative Procedures Act (IDAPA), the Local Land Use Planning Act (LLUPA) and the Constitutional rights of all members of the public to procedural due process under the Fourteenth Amendment of the U.S. Constitution.

While an address number change is not technically a street-name change, the functional impact on established property owners and businesses is equally significant. As such, the fact the Canyon County Code requires a public hearing when changing a street name but does not require a public hearing when changing address numbers is suspect.

In the event the Director's proposed address changes take effect, Appellants intend to exhaust all administrative remedies and, if necessary, seek judicial review of the decision on the basis, among others, that Canyon County Code § 06-05-17 violates Appellants' due process rights and must therefore be invalidated. Appellants urge the Board to apply meaningful scrutiny to both the Director's Decision and the relevant ordinance and not treat address renumbering as a routine administrative matter where the affected property owners bear substantial legal and financial consequences. This process should instead follow the same public hearing process required for

changes to street names in order to avoid violating the constitutional rights of Appellants and the rest of Canyon County's real property owners.

III. BURDEN OF PROOF

Pursuant to Canyon County Code § 06-05-23(1)(B), Appellants bear the burden of proving that granting this appeal (i.e., retaining the current address number) will not cause an adverse effect to the health, safety, and welfare of the community. Appellants satisfy this burden as follows:

Retaining the current address numbers creates no health, safety, or welfare concern. The current addresses are functional, properly posted and long-known to emergency services. No evidence has been presented, and to Appellants' collective knowledge and belief, no such evidence exists to indicate that the current address numbers have ever caused or are likely to cause any emergency response delay, navigational error or public safety incident. Accordingly, denying the proposed renumbering will have no adverse effect on the public health, safety, or welfare of the community.

Conversely, if the proposed renumbering takes effect, the imposition on Appellants would undermine the stated purpose of the relevant ordinance which is "to promote the public health, safety, *general welfare, peace, good order, comfort and convenience* of the county *and the inhabitants thereof*." Canyon County Code 06-05-05(2). (emphasis added). Put another way, the ordinance is not solely for the convenience of the County and the Board must consider the language of § 06-05-05(2).

Of even greater concern is the fact that the Director's Decision indicates that any further development "such as a building permit for another dwelling" along the shared driveway will trigger the need for further address changes. The County's piece-meal approach is completely unnecessary and could eventually re-harm Appellants for a second time. The County should also consider that each time an address is changed, temporary confusion and navigational uncertainty will occur. Requiring addresses change now given the eventuality of further address changes in the future frustrates the relevant ordinance's stated purpose. *See* Canyon County Code § 06-05-05(2).

IV. RELIEF REQUESTED

By this Notice of Appeal, Appellants request that the Board:

1. Accept and process this Notice of Appeal in accordance with Canyon County Code §§ 06-05-23(1);
2. Schedule a hearing on this Appeal and provide Appellants with an opportunity to be heard;
3. Overturn the Director's Decision to renumber the Properties' respective addresses and direct that the current address numbers be retained; and
4. Grant such further and additional relief as the Board deems just and appropriate.

In the alternative, and should the Board decline to overturn the Director's Decision, Appellants will request that the Board grant a variance pursuant to Canyon County Code § 06-05-23(2), on the

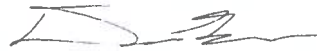
grounds that enforcement of the renumbering would result in extraordinary hardships to Appellants and that the public interest is already fully served by the current address numbers. Such grounds will be more comprehensively described in the variance applications Appellants will submit in the event the Board, upon a hearing, denies this Appeal.

5. CONCLUSION

The Director's proposed address renumbering exceeds the limited authority granted by Canyon County Code § 06-05-17(6), is unsupported by any demonstrated confusion or emergency-services access concern, would impose extraordinary hardships on Appellants without any corresponding public benefit, and will violate Appellants' procedural due process rights guaranteed by the U.S. Constitution's Fourteenth Amendment. Appellants respectfully urge the Board to overturn the Director's Decision and preserve Appellants' current and respective address numbers.

This Notice of Appeal is dated April 1, 2026 and is timely submitted by Appellants' legal counsel, Morrow & Fischer, PLLC, on Appellants' behalf. Please direct all future correspondence on this matter to the office of Morrow & Fischer.

MORROW & FISCHER, PLLC



Daniel W. Goodman
Attorneys for Appellants

Canyon County Development Services

111 N. 11th Ave. Room 310, Caldwell, ID 83605
(208) 454-7458

Building Divsn Email: buildinginfo@canyoncounty.id.gov **Planning Divsn Email:** zoninginfo@canyoncounty.id.gov

Receipt Number: 88022

Date: 4/3/2026

Date Created: 4/3/2026

Receipt Type: Normal Receipt

Status: Active

Customer's Name: Morrow & Fischer PLLC

Comments: ADR2026-0001

Site Address: 18995 CHICKEN DINNER RD, Caldwell ID / Parcel Number: 36586010B0

CHARGES

<u>Item Being Paid For:</u>	<u>Application Number:</u>	<u>Amount Paid:</u>	<u>Prevs Pymnts:</u>	<u>Unpaid Amnt:</u>
Administration - Miscellaneous	ADR2026-0001	\$1,100.00	\$0.00	\$0.00

Sub Total: \$1,100.00

Sales Tax: \$0.00

Total Charges: \$1,100.00

PAYMENTS

<u>Type of Payment:</u>	<u>Check/Ref Number:</u>	<u>Amount:</u>
Check	10375	\$600.00
Credit Card	195002571	\$500.00

Total Payments: \$1,100.00

ADJUSTMENTS

Receipt Balance: \$0.00

Issued By: maqomez