Teton County Planning and Zoning

In response to your request for input on the proposed CUP for the Teton links Golf and RV Park public hearing on February 5, 2011 I submit the following:

I am generically opposed to a development of this kind in a location of this nature as it is inconsistent with the overall philosophy of the current plan and if approved would subject adjacent landowners to significant increases in traffic, dust, noise, light and damage the tranquility of the present area.

State of Idaho IDAPA codes provide guidelines and regulations for sewage and water systems. Included are tables for use in designing new systems. For sewage they expect 125 gallons per day for a trailer park and 155 gallons per day for a campsite. This would result in expected peak flows between 13,500 and 16,740 gallons a week and a potential maximum peak flow 117,180 gallons per week over a heavy use period like the 4th of July. It should be noted that presently there are less than a dozen homes and ranches along the four miles of 4000 West from the Buxton road to Packsaddle road. The proposal would increase the sewage generated more than tenfold and concentrate it in less than a quarter mile. The conceptual proposal identifies underground sump storage of such waste. Sump storage of this nature is not clearly identified in IDAPA codes, but all sections which could pertain contain common requirements including design to withstand 100 year probable floods and accessibility in 25 year flood events. The probable flood zone is high risk for a 25 year flood on all of the 320 acres in the proposal and extends from the Teton River to the city of Driggs. It is not clear how adequate protection to the environment could ever be achieved in this location.

Discussion with Curt Moore indicates the proposal includes pumping and hauling the sewage to Driggs or Ashton. Prospective Cities should hire an expert to study before proceeding as it appears that sewage facilities that receive pumped sewage must meet the requirements of a sewage pumping facility also. The present Driggs facility would require costly upgrade and probable relocation to achieve this.

IDAPA codes also define a Public Drinking Water System to include any system with over 25 service connections. The proposal includes over 100 service connections and states the present Golf Course system is adequate. IDAPA codes require backflow preventers between non-drinking water systems and specifically identify golf course irrigation systems as one. They also advise against dead legs and the proposal is a designed dead leg for all but a portion of 120 days a year. The dead leg issue could be overcome with a chlorination system and periodic flushing. Systems that have backflow preventers and disinfection require on site licensed drinking water operators, monthly water quality testing, periodic backflow preventer testing and year round access to the water storage unit among other things.

The proposal indicates measures for dust abatement due to increased road traffic are of concern. Of greater concern is the physical damage to the 4000 west road surface which currently is pounded into washboard by the traffic of lighter vehicles each summer. It should also be noted two pickup trucks passing consume the width of the current road. Two large buses like RVs would be challenged to stay on the road while passing. If approved to go forward paving and widening of the road should be required.

If a RV park is a good idea for the Driggs area, much of the risks and costs could be avoided by locating it out of the flood plain, in an area identified for development under the present comprehensive plan, and hooking it up to a qualified Public Drinking Water system. Designing for use year round rather than less than 120 days would also mitigate risks.

If approved for further study State of Idaho IDAPA permits appear to be required and desirable to mitigate the increased risk of putting a non typical Public Drinking Water system and large raw sewage storage and handling system in a high risk flood plain.

Craig Chynoweth