

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

JAN 27 2011

RECEIVED

Teton County Commissioners and Planning and Zoning Commission
150 Courthouse Drive, Room 107
Driggs, Idaho 83422

January 27, 2011

Re: Teton Links RV Park Conditional Use Permit

Please accept the following comments on the proposed Teton Links RV Park Conditional Use Permit on the behalf of Friends of the Teton River (FTR). FTR is a nonprofit organization dedicated to understanding and improving ground and surface water and fisheries resources in the Teton Basin, including the Teton River, its tributaries and wetlands. FTR furthers this mission by conducting scientific research about the Teton Watershed, using this research to enhance and protect local water resources, and communicating this information to the public.

The proposed project is located within a highly sensitive wetland area, where development actions may have significant impacts to water resources. Our comments below address the following specific concerns: 1) Potential impacts to ground (drinking) water quality; 2) Potential impacts to surface water quality; 3) Potential impacts to native Yellowstone cutthroat trout spawning and rearing habitat.

1) Ground (Drinking) Water Quality

Maintaining safe, high quality drinking water in Teton Valley is an area of strong concern to residents, visitors, natural resource experts, and governmental agencies. Data collected by the Idaho Department of Environmental Quality, Friends of the Teton River, and others indicate that surface and ground water in the area of the proposed project is close to or already in exceedance of acceptable thresholds for water quality, specifically for E. coli and nitrates. Additionally, the proposed development lies within the WW Wetland and Waterways Overlay Area (Section 8-5-1-D of Title 8), and there is evidence that ground water, at various times of the year, comes within ten feet of the ground's surface on the proposed development parcel. As a result, we are concerned that any storage and/or treatment of septic wastes associated with this project could cause a further increase in ground water quality pollutant loadings unless protective measures are implemented.

- **We recommend that the permit applicant contract a qualified Nutrient-Pathogen professional to conduct a detailed Nutrient-Pathogen study for any septic waste storage and/or treatment associated with this project, utilizing the criteria set forth by the Idaho Department of Environmental Quality and the Teton County Groundwater Protection Ordinance.**
- **We recommend that the permit applicant contract a qualified Nutrient-Pathogen professional to design a detailed emergency response and mitigation plan in the event of a septic waste spill from an individual vehicle, and/or in the event that the project's primary septic waste storage and/or treatment plan should fail.**

Friends of the Teton River is a non-profit 501 (c)(3) organization dedicated to working for clean water, healthy streams and abundant fisheries in the upper Teton Basin

Friends of the Teton River

- **If Nutrient-Pathogen contamination cannot be eliminated for the entire projected lifespan of this project, we recommend significant modification of the proposed project plan until this standard can be met.**

2) Surface (Stream) Water Quality

Adverse changes in the water quality of the upper Teton River have been observed over the last several decades including increased siltation, hydrologic alteration, and elevated levels of nitrates and bacteria. These changes can impact human safety and recreation as well as fish and wildlife. In 1998, the U.S. Environmental Protection Agency designated the upper Teton River and many of its tributaries as not meeting water quality standards due to excessive nutrients, temperature and sedimentation under section 303(d) of the Federal Clean Water Act. Water quality testing by Friends of the Teton River (ongoing since 2001) and the Idaho Department of Environmental Quality (IDEQ) has continued to show high levels of water quality pollutants near the proposed project site; of particular concern are exceptionally high levels of *E. coli* bacteria in Woods Creek, and high nutrient levels in Woods Creek and the Teton River near the proposed project site. Because of these persistent surface water quality concerns, it has been recommended that the IDEQ continue to list the Teton River, from its headwaters to Bitch Creek, as an Impaired Stream, and continue to enforce Total Maximum Daily Load (TMDL) requirements. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive from human-caused sources and still meet water quality standards.

Because the streams near the project area already exceed TMDL requirements, we are concerned that construction activities and roads associated with the proposed project may continue to increase sediment discharge and nutrient loading; that vehicle traffic and parking may increase urban runoff potential, adding additional pollutants to an already impaired system; and that increasing impervious surface area in the proposed project area may further alter the hydrology, resulting in erosion and thus increased sediment loading.

- **We recommend that the permit applicant work with a qualified contractor to design a construction plan that eliminates all sediment discharge into streams during construction activities, and a monitoring plan to ensure that this standard is met. If sediment discharge into streams cannot be eliminated during construction, we recommend significant modification of the proposed project plan until this standard can be met.**
- **We recommend that the permit applicant work with a qualified contractor to design a site plan that limits urban runoff and impervious surface area, and eliminates sediment discharge from roads/parking areas. This may include, but is not limited to, construction of retention ponds/swales, use of permeable parking surfaces, and protection and/or restoration of riparian vegetation buffer zones. If urban runoff and significant hydrologic alteration cannot be eliminated for the entire projected lifespan of the proposed project, we recommend significant modification of the project plan until this standard can be met.**

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3) Yellowstone cutthroat trout habitat

Native Yellowstone cutthroat trout (YCT) populations in the Teton Watershed experienced a precipitous decline (95%) between 1999 and 2003. YCT are currently listed by Idaho Fish and Game as a species that is imperiled or at risk and vulnerable to range-wide extinction or extirpation. Since 2003, FTR has prioritized on-the-ground actions that will improve overall stream conditions. FTR has been working with a wide variety of partners¹ to restore stream banks, improve fish habitat, and restore stream flows and fish passage upstream and downstream of the proposed project area. Due in part to this comprehensive approach, the Bonneville Environmental Foundation (BEF) designated FTR as a recipient of their "Model Watershed" grant and has helped FTR to develop a 10-year (2010-2020) Watershed Restoration and Monitoring Plan for the Teton Watershed.

Research conducted by FTR, the Idaho Department of Fish and Game, and others indicates that many of the spring creeks in the wetlands between Highway 33 and the Teton River are highly productive YCT spawning and rearing habitat. These spring creeks/wetlands have the potential to play a significant role in the recovery of YCT in the Teton Watershed. The proposed project area is bisected by numerous small spring creeks which have not yet been studied to determine whether they are currently being utilized as spawning and/or rearing habitat by YCT. We are concerned that activities associated with the proposed project will impact habitat which may be critical to the survival and recovery of YCT in the Teton Watershed.

- **We recommend that, prior to approval of the project, the permit applicant contract a qualified fisheries professional to conduct a survey (at the appropriate time of year and using accepted methods) of all creeks, ponds, and other surface water bodies within the project area to determine whether there is evidence of YCT spawning redds and/or habitat utilization by YCT fry and/or adults.**
- **We recommend that, if the above-mentioned survey demonstrates usage of project-area streams by YCT, the permit applicant contract a qualified fisheries professional to ensure that the project does not cause any detrimental effects to YCT habitat in spring creeks within and downstream of the project area. Such methods may include, but are not limited to, implementation of Best Management Practices ("BMPs") which restrict the time frame in which construction work is performed in or near streams containing YCT.**

¹ FTR's partners in YCT recovery in the Teton Watershed include, but are not limited to, the U.S. Forest Service, the Natural Resources Conservation Service, US Fish and Wildlife Service, the US Army Corps of Engineers, the US Environmental Protection Agency, the Idaho Department of Fish and Game, the Wyoming Department of Fish and Game, the Idaho Department of Environmental Quality, the Idaho State Office of Species Conservation, Teton County, Idaho, Teton County, Wyoming, the City of Driggs, the City of Victor, the Teton Regional Land Trust, Trout Unlimited, the Bonneville Environmental Foundation, 1% for the Tetons, the Arthur B. Schultz Foundation, the Confluence Foundation, the Idaho Fish and Wildlife Foundation, the Laird Norton Foundation, the Maki Foundation, the National Forest Foundation, the National Fish and Wildlife Foundation, the Sand County Foundation, the Teton Springs Foundation, Jackson Hole One Fly, Orvis, Patagonia, Silverstar Communications, Grand Targhee Resort, Teton Springs Resort, M.D. Nursery, Aqua Terra, Mainstream Restoration, and more than 100 individual landowners.

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- **We recommend that any/all plans for the “pond with fly-fishing pier” included on the site (including but not limited to plans for stocking, filling, dredging, enhancing and/or enlarging) be approved by the following agencies prior to project approval: the Idaho Department of Fish and Game; the U.S. Army Corps of Engineers; and the Idaho Department of Water Resources.**
- **Friends of the Teton River would be happy to work with the permit applicant to explore options for stream and riparian habitat restoration work on the site.**

In conclusion, Teton Valley's water resources and Yellowstone cutthroat trout populations are in a threshold condition and in need of strong protective measures. The proposed Teton Links RV Park is located within a highly sensitive wetland area, where development actions may have significant detrimental impacts on our community's water resources. Because of the unique location of this project, we strongly encourage the Teton County Commissioners and Planning and Zoning Department to proceed with caution in approving this Conditional Use Permit. Additional study, performed by qualified professionals, is necessary to determine whether this project can be designed in a manner that protects our valley's valuable water resources. Please do not hesitate to contact us if you have any additional questions or need clarification on any of the above recommendations.

Sincerely,



Tom Fenger, Executive Director
Friends of the Teton River

Friends of the Teton River is a non-profit 501 (c)(3) organization dedicated to working for clean water, healthy streams and abundant fisheries in the upper Teton Basin

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TETON COUNTY
PLANNING & ZONING

JAN 27 2011

from
Mrs. Toni Hill
1780 S 6000 W
Driggs, ID 83422
354-2747

RECEIVED

To Teton County Planning & Zoning,

These are some of my concerns about Robert & Sharman Wilson's proposed 108 site R.V. Park on the Links Golf Course.

① 4000 South is a road through the wetlands that pushes up & gets large soft spots. Heavy vehicles like R.V. will make an already problem road nearly impassable. Untel this road is brought up to a standard that can be paved, & then is paved, this amount of heavy R.V. traffic should not be considered.

② The area is wetlands. I am unaware of a large enough upland

②

sight where a 108 unit R.V. park could be built. Our county R. & Z. likes things clustered, not scattered.

③ This part of Teton Valley is a wide open natural area filled with wild life. There is land near the areas protected with Teton Regional Land Trust easements. A 108 unit R.V. park will have a negative effect on wildlife, among other things. I do not believe in spraying for mosquitos in a wetlands area, since mosquitos are important to the natural foodchain.

④ What is the depth & the capacity of the well that will provide water for the 108 R.V. Units? Has it been tested, & is it safe to drink?

③

Often wells drilled in the swamps are not drinking water quality.

⑤ The permit mentions 8 fishing cabins. Are these 8 fishing cabins in existence at this time? Does each cabin have its own well with safe drinking water + a contained sewer system?

⑥ The sewerage being hauled will be another heavy truck on a soft road.

⑦ Teton County has always lacked funds to enforce things like weed control, dust control + if a person misuses what their zoning permit allows.

(4)

⑧ If the R.V. park is scattered out, every R.V. pad must be inspected in elevation to insure that none are placed in the wetlands. It needs to be listed if the store is allowed to sell groceries or prepared food. (A coffee shop, sandwich bar etc.) Who is going to police if R.V. owner stay over 3 days, or if there are county residence using our schools, etc.? As our economy plummets downward, 108 R.V. units could end up being a trashy trenchant trailer park. Does the county have the safe guards to punish offenders, & keep this type of thing from happening?

Thank you,

Toni Hill



Valley Advocates for Responsible Development

January 27, 2011

Teton County Planning & Zoning Commission
150 Courthouse Drive
Driggs, ID 83422

RE: Links Golf Course RV Park

A big thank you to the planning department for scheduling this work session to solicit feedback and hash out questions on the feasibility of this Conditional Use Permit (CUP) before the applicant spends considerable sums of money on the application process. Given the sensitive location of this particular proposed special use, it is good to get as much feedback as possible on the front end - especially from local agencies and nonprofits who may have particularized concerns with an RV Park proposed in this location.

As we all know, CUPs are not given by right - a special use is one that is not allowed outright in a particular zoning district. Rather, the use is subject to heightened scrutiny and allowed only if certain conditions specified in the county's ordinances are met. The Local Land Use Planning Act (LLUPA) specifically grants cities and counties broad authority to apply conditions to the approval of any special use permit¹ and authorizes studies of the social, economic, fiscal, and environmental effects of any proposed use.²

Looking at the four criteria in Title 8 of the county code that are used to evaluate CUPs, I have some specific questions and suggestions:

CRITERIA #1: The location of the proposed use is compatible to other uses in the general neighborhood.

¹ I.C. § 67-6512(d) provides that: Upon the granting of a special use permit, conditions may be attached to a special use permit including, but not limited to, those: (1) Minimizing adverse impact on other development; (2) Controlling the sequence and timing of development; (3) Controlling the duration of development; (4) Assuring that development is maintained properly; (5) Designating the exact location and nature of development; (6) Requiring the provision for on-site or off-site public facilities or services; (7) Requiring more restrictive standards than those generally required in an ordinance; (8) Requiring mitigation of effects of the proposed development upon service delivery by any political subdivision, including school districts, providing services within the planning jurisdiction.

² I.C. § 67-6512(e) provides that: Prior to granting a special use permit, studies may be required of the social, economic, fiscal, and environmental effects of the proposed special use.



Valley Advocates for Responsible Development

- **Question #1:** This proposed RV Park would abut Woods Creek Fen, the most floristically unique wetland in Teton County, Idaho. Fens take thousands of years to form and are considered irreplaceable wetlands. The golf course property itself is almost entirely delineated wetlands, which flood annually. When this property floods each spring, all the surface water in this area becomes interconnected, including the Teton River. ***How will this RV Park impact the health, viability, and overall water quality of Woods Creek Fen, the Teton River, and abutting wetlands?***
- **Question #2:** The Teton River, Woods Creek Fen, and the abutting wetlands are habitat for several bird, insect, and animal species. Several rare plant species have also been documented within Wood Creek Fen. In addition, all 8 layers of the Wildlife Overlay are present in this immediate area. The site for the proposed RV Park is specifically classified as primary wetlands habitat. ***How will the RV Park impact surrounding habitat and wildlife populations?***
- **Question #3:** There are multiple, contiguous conservation easements that would abut this RV Park to the west, as well as the Huntsman and Woods Creek Fen easements nearby to the southeast. ***How will these easements be impacted if this permit is approved, and how will the RV Park affect future easements in this area? How will future state, federal, and private conservation funding be impacted if an RV Park is permitting in the epicenter of all these conservation efforts?***
 - **Suggestion #1:** This Board should specifically solicit comments from Idaho Fish & Game, the Teton Regional Land Trust, and Friends of the Teton River on the volume of state, federal, and private dollars spent on conservation and restoration projects in this area.
- **Question #4:** This is probably the most important question of all. Both the Fen and the Teton River are major components of our valley's tourism industry. Naturalists, fishermen, and hunters come from all over the world to experience the wildlife in these rare areas. ***What would be the overall economic consequence of water quality deterioration and habitat loss in Woods Creek Fen, the Teton River, or the abutting wetlands due to decreased tourism?***
 - **Suggestion #2:** If our community is going to consider bartering away this precious ecosystem for the sake of economic development, then we must first be certain that we are supporting a viable commercial endeavor. An



Valley Advocates for Responsible Development

economic feasibility study should be done by the county to look at the entry costs, carrying costs, and overall viability of an RV Park like this and compare it to the potential decline in tourist dollars if this ecosystem is compromised.

CRITERIA #2: The proposed use will not place undue burden on existing public services and facilities in the vicinity.

- **Question #5:** *How will this RV Park impact both Buxton Road and 4000W?*
- **Question #6:** *How would trash be managed? How will micro-trash be managed?*
- **Question #7:** *What is the feasibility of the proposed sewage management system? What is the failure rate of the proposed system?*

CRITERIA #3: The site is large enough to accommodate the proposed use and other features as required by this title.

- **Suggestion #3:** The concept map shows the campground is arranged to just barely fit in the areas not delineated as wetlands. A study must be done to determine the true boundaries of the wetlands and the extent to which this property floods annually.

CRITERIA #4: The proposed use is in compliance with, and supports the goals, policies, and objectives of the Comprehensive Plan.

- **Suggestion #4:** Because of deficiencies in our current Comprehensive Plan, Teton County is in the midst of crafting a new plan. A central focus in the new plan will be natural resources and economic development. The plan will address what types of land uses are allowed in the rural county, and where they will be allowed. These are big questions not to be taken lightly. This is a large CUP proposed in an extremely sensitive, irreplaceable habitat area. Perhaps this application should be stayed until the new Comprehensive Plan is completed and the community has given direction on where these kinds of intensified uses should be allowed.

I look forward to elaborating in more detail at the February 8th work meeting. Thank you once again for all of your hard work in the service of our community.



Valley Advocates for Responsible Development

Sincerely,

Anna Trentadue
VARD Program Director / Staff Attorney

January 28, 2011

To: Teton County Planning & Zoning Commissioners
RE: CUP for proposed Links Golf Course RV Park

Dear Commissioners:

I am pleased that you will be holding a work meeting to consider the feasibility for a CUP for an RV park at the Links Golf Course. In short, I do not think the proposal meets the criteria in Title 8 for granting a CUP and thus I think it would be wise to discourage the applicants from taking this proposal forward to public hearings.

An RV park at this ecologically sensitive site would be incompatible with the conservation efforts in the vicinity, including surrounding conservation easements and the Woods Creek Fen. The wetlands habitat at this site would be very negatively impacted, and I do not think there are any conditions that could be imposed on the CUP that would prevent degradation to the natural resources. Community surveys conducted by the Plan for Planning Committee as a first step in creating a new Comprehensive Plan show concern for wildlife as one of the top priorities of valley residents, so it is important to consider that all mapped layers of the Wildlife Overlay are present in the vicinity of this proposal. Development such as this proposed RV park that would degrade and negatively impact wildlife habitat is not compatible with the clear wishes of this community.

Additionally, in the current economic situation, I do not think this proposed RV park is viable. Would we destroy natural resources for a commercial enterprise that will likely fail? This area is suitable for low impact uses that capitalize on the unique natural features of the area, whereas RV parks are appropriate near an existing commercial center. For that matter, can another RV park at any location in this valley succeed? The valley already has Teton Mountain Lodge and RV Park in Teton and Teton Valley Campground in Victor. Although I realize it is within the rights of anyone to start up a new business, obtaining a CUP is *not* a right. Teton County cannot afford any more failed developments, including businesses operating with CUPs.

I urge you to advise the applicants to abandon their plans for an RV park at the Links Golf Course as not meeting the criteria set forth in Title 8 for granting conditional use permits.

Sincerely,
Alice Stevenson
1101 E 5250 S
Victor, Idaho

Re: Parcel Numbers RPO5N45E205401 & RPO5N45E290601

Dear Planning Board:

We received your letter informing us that you intend to conduct a work session on the above matter. Unfortunately, we will be away from the valley on February 8 and cannot attend. But we want our voice to be heard and are adamantly opposed to any RV park on this property. The water pollution and sewage problems that would result from such a development endanger too many natural resources.

We own the 315 acres, across the road from the golf course on 4000 W. We have placed most of our acreage, nearly 300 acres, under conservation easement to protect the land's open space, many bird species, wetland marshes, and wildlife habitat. Other families in the area also have conservation protection on their farms and ranch lands. Three creeks run through the Links golf course, across our land and out to the Teton River.

A 108 site RV park in this very high water table is unacceptable and we urge you to turn down this proposal.

Please accept this email as our voice of strong protest against this proposed CUP amendment.

Sincerely,

Carole and Norm Hofley

-----Original Message-----

From: Fred Hanson [<mailto:fredhanson@mac.com>]

Sent: Saturday, January 29, 2011 12:22 PM

To: pzadmin@co.teton.id

Subject: Teton Links

Dear P&Z board

I would like to go on record as opposing Teton Links RV Park. This is a terrible location for an RV park, being in a flood plain, with proximity to conservation easements and near the river. It would be inappropriate for this section of the valley which is largely rural. Also, this area is protects a great deal of wildlife, which draws a lot of tourist and economic activity to the valley. As a landowner in the vicinity, I seriously oppose this idea.

Fred Hanson

January 28, 2011

Teton County Planning and Zoning Commission
150 Courthouse Drive
Driggs, ID 83422

RE: CUP Amendment for Links Golf Course and RV Park

I appreciate the opportunity to comment on this project particularly at this very initial phase. Typically comments are solicited well into the process after the developer has invested a lot of time and money at which point it's more difficult for the County to recommend major revisions or to deny an application.

I think this is the right project but in the wrong place. An RV park could do a lot to help Teton County's ailing economy by encouraging tourism traffic that benefits a whole suite of local businesses. The proposed location is inappropriate. Anticipated revenue gains could be squandered by impacts to sensitive natural resources including fish and wildlife that draw many to our valley.

This is one of the most ecologically sensitive areas of the county (and possibly the State) due to its proximity to Woods Creek Fen, which is recognized as a Class 1 Wetland by the Idaho Department of Fish and Game. "Class I sites represent examples of plant communities in near pristine condition and often provide habitat for high concentrations of state rare plant or animal species. The high quality condition of the plant community is an indicator of intact site features such as hydrology and water quality. Impacts to Class I sites should be avoided as these sites are not mitigable and alteration or enhancement of these sites will result in significant degradation. Conservation efforts should focus on full protection including maintenance of hydrologic regimes (Conservation Strategy for Henrys Fork Basin Wetlands, Jankovsky-Jones, IDFG, April 1996)."

Any actions that potentially threaten hydrology or water quality could have irrevocable impacts on surrounding wetlands and the Teton River, particularly Woods Creek Fen. Furthermore this area is very important to wildlife including many species designated by Idaho Fish and Game as Species of Greatest Conservation Need. This parcel intersects almost all of the zones within Teton County Wildlife Overlay. The surrounding lands are so important to the viability of local fish and wildlife that extensive investment has been made in surrounding conservation easements.

I encourage you to look closely at this project. There are countless better places in Teton Valley to accommodate this use. I strongly encourage the applicant to explore other locations where potential tradeoffs to sensitive natural resources are much less concerning.

Sincerely

Jeffrey Klausmann
P.O. Box 1218
Driggs, ID 83422

Mark Rockefeller

From: John Cushman [John.Cushman@cushwake.com]
Sent: Tuesday, February 08, 2011 6:41 PM
To: mark@tetonvalleyrealty.com
Subject: FW: Letter from john cushman to Teton County Planning & Zoning Commission

John C. Cushman, III - Lic #00367890
Chairman of the Board
Cushman & Wakefield - Lic #00616335
601 S. Figueroa Street, #4700
Los Angeles, CA 90017

Phone - 213/629-6575
FAX - 213/629-6501
Cell - 917/912-0427

john.cushman@cushwake.com
www.cushmanwakefield.com

From: John Cushman
Sent: Tuesday, February 08, 2011 5:23 PM
To: anna@tetonvalleyadvocates.org
Cc: till@silverstar.com
Subject: Letter from john cushman to Teton County Planning & Zoning Commission

Anna - can you please read this at the meeting and submit into the public record.

Teton County Planning & Zoning Commission
150 Courthouse Drive
Driggs, Idaho 83422

Re Links golf course RV Park

I am aware that the Commission will be meeting this evening to hear public comments regarding the proposed development. and a request for a Conditional Use Permit.

As a matter of background information the Cushman family Trusts own slightly less than 2,000 acres in the immediate vicinity of the subject property. We have been in the valley since 1978 and have been responsible stewards of our land holdings and strong supporters of responsible development in the Teton Valley.

Our family is committed to protecting the environment, the wetlands, and especially the Teton River. We have made a substantial contribution to the Teton Regional Land Trust in the form of a Scenic Easement on the Teton River which is in close proximity to the subject property.

We do not believe that the Commission should give favorable consideration to a Conditional Use Permit for the subject property for the reasons set forth below.

It is my understanding that the property in question lies within different Teton County planning overlays with almost all the property being in the wetlands and as well that 100% is in the floodplain. I am deeply concerned as to the impact of such a development on the water quality of the Woods Creek Fen the abutting wetlands and the Teton River.

The Cushman family does not believe that a 108 -unit RV Park is an appropriate use nor in the best interest of the community given the very fragile wetlands area and the sensitive eco-system in close proximity to the Teton River.

The Teton Valley is a very special place where great care needs to be taken by the community and the elected and appointed public officials to protect and preserve those natural resources and assets that have created such a special place for the benefit of those who live, work and visit the Valley.

Clearly the granting of a Conditional Use Permit will be a huge threat to the local streams, associated animal life and the nearby Woods Creek Fen. The vibrancy of these natural resources and habitats are critical components that allows so many residents and visitors to enjoy the well rounded nature of the community, the beauty of the valley where it is critical for everyone to respect ones neighbors and the environment.

As the Chairman of the largest privately commercial services firm in the world I know what the "great recession" of 2008, 2009 and much of 2010 has done to the financial health of the Teton Valley, America and most areas of the world. The last three years have wrecked havoc on the good people of the Valley but I am one who knows that better times are ahead for all of us. I know that there are some positive signs occurring in the residential real estate markets in the valley given the increased availability of debt and the moderate improvement in consumer confidence.

The Teton County Planning & Zoning Commission needs to carefully weigh the positives and negatives of the proposed development and ascertain if the request for a Conditional Use Permit involving the subject property is in the best interests of everyone who cares about preserving the environment which has made the Teton Valley such a special place to live, work and visit.

Respectfully submitted.

Sincerely

John C. Cushman, III - Lic #00367890
Chairman of the Board
Cushman & Wakefield - Lic #00616335
601 S. Figueroa Street, #4700
Los Angeles, CA 90017

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