



Valley Advocates for Responsible Development

April 3, 2009

Teton County P&Z
89 North Main Street
Driggs, Idaho 83422

RE: Blue Indian Preliminary Plat.

Dear Commissioners,

The Teton County code (TCC) obliges this board to use the preliminary plat phase to take a good look at Blue Indian's relationship to surrounding development, any special site conditions, and how this subdivision meets the requirements of Titles 6, 8, and 9. When reviewing this subdivision, please consider the following issues:

- **An impact analysis with proposed mitigations should be completed as required in Title 9.** The time has come for this Board to raise the bar on impact analyses and proposed mitigations. Both state and county law charge this board with the duty to analyze development impacts on community services and how they shall be mitigated. The Targhee Hill Estates fiscal impact study and the attached critique of this study (*See Attachment A*) represent a good methodology for how to best estimate the true fiscal impacts. (I.C. §§ 67-6508, 67-6512, 67-6519 and TCC 9-6-2-D.)
- **An up-to-date and thorough tax estimate should be completed.** This board also needs to raise the bar on tax estimates; they are an invaluable planning tool and a mandatory requirement in the code. Here, the estimate of tax revenues predicts significant income for the county, but it is based on a one-time flush of high lot values (\$570,000) that are not represented in today's market. (*See Attachment A* as discussed above.) (TCC 9-6-2-B)
- **A traffic study and road conditions/pavement analysis should be conducted.** When neighboring Scenic River Estates PUD was going through the approvals process, the dangerous condition of Bates Road was a big issue. The boom of developments in this area further exacerbates these dangerous conditions. Blue Indian will create an additional 418 vehicle trips per day (*See Attachment B*) This is a health and safety issue that must be addressed. (TCC 9-3-3-B)

- **Please require a natural resources inventory and mitigation plan.** This subdivision is proposed in a sensitive wildlife area where surrounding developments have been planned to coordinate wildlife connectivity. This board has authority to request a wildlife inventory and mitigation plan. (TCC. 9-3-3-B)
- **A more-detailed area map is needed.** A good understanding of large-scale area connectivity is critical to informed decision making. Please require a map depicting surrounding connectivity to other neighborhoods and how this subdivision will coordinate its road, traffic, and wildlife mitigations. (TCC 9-3-3, 9-3-3-B)
- **Water rights must be legally secured for the pond and park amenities.** Proof of available water rights is a county code requirement, and at this time it is unclear what water rights are available to service these amenities. The applicant must obtain written authorization from the ditch owner before construction begins. (I.C. §§ 42-1207, 42-222 and TCC 9-3-3-A-1)

We have all see the cumulative harmful impacts from subdivisions and PUD's that were approved without carefully examining their interconnectivity and the mitigation of impacts. Responsible development means asking these questions and requiring feasible solutions before approving an application. Thank you once again for all of your time and attention in the service of our community.

Sincerely,

Anna Trentadue
WARD Program / Staff Attorney