



## PRELIMINARY PLAT REVIEW PUBLIC HEARING

**FOR:** Eddyline Ranch Subdivision  
**WHERE:** W 4000 N & N 7000 N, SW of Tetonia  
**PREPARED FOR:** Board of County Commissioners  
Public Hearing of April 28, 2025

**LANDOWNER:** STRR LLC

**AGENT:** Brandon Darnton

**ENGINEER:** Harmony Design & Engineering – Randy Blough

**REQUEST:** Harmony Design & Engineering, on behalf of STRR LLC., is proposing to create twelve (12) lots ranging from 32.3 acres to 39.22 acres from an existing 423.83 acre parcel. Lot 6 will be owned by the HOA to serve as the hub for community amenities including a pond and ranch camp clubhouse centered within the subdivision. A ranch manager employee housing cabin and maintenance barn will be located in the south portion of lot 6 near the intersection of Eddyline Drive and W 4000 N. The site was previously used for agriculture and is currently undeveloped.

Packsaddle Creek crosses through the southern portion of the site. The Teton River flows just east of the property with a seasonal side channel entering the northeast corner of the site at two locations. The entire parcel lies within the NRO (Big Game Migration Corridors and Seasonal Range). The southern half of the property lies within the NRO (Sharp-tailed Grouse Breeding Habitat). The developer plans to initiate several habitat enhancement projects across the development, including improving fisheries and big game habitat.

**APPLICABLE COUNTY CODE:** Subdivision Preliminary Plat Review pursuant to Teton County Land Development Code, Chapter 6, and Chapter 4 Section 4-13-D, Teton County Zoning Ordinance, (revised 8/3/2022); and the Teton County Comprehensive Plan (A Vision & Framework 2012-2030).

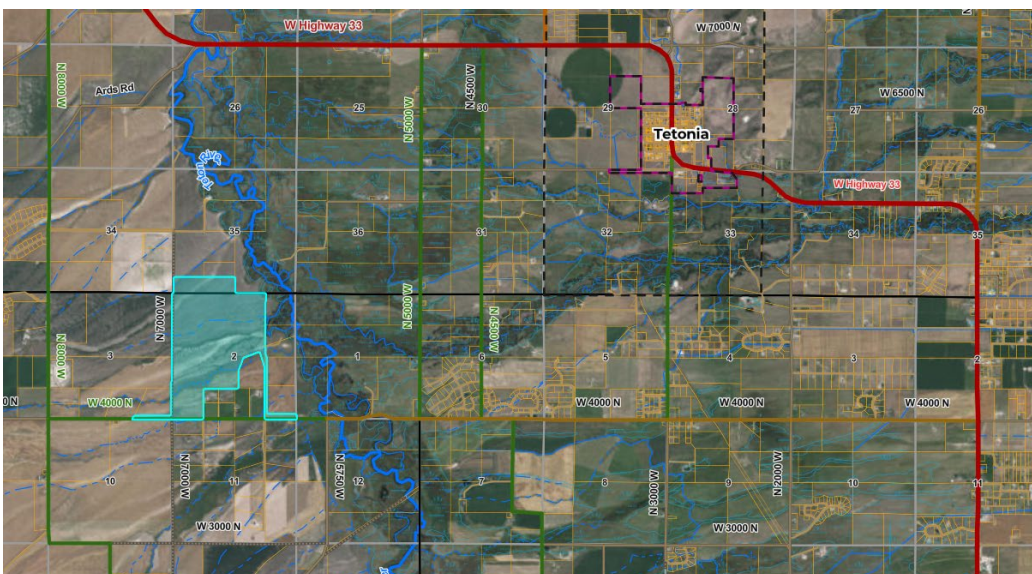
**LEGAL DESCRIPTION:** TAX #7751 SEC 2 T5N R44E

**PARCEL NUMBER:** RP05N44E020700

**LOCATION:** W 4000 N & N 7000 N, SW of Tetonia

**ZONING DISTRICT:** RA-35 acre average density

**PROPERTY SIZE:** 423.83 acres



*Figure 1. Vicinity Map; Subject Parcel Highlighted Blue – SW of Tetonia*

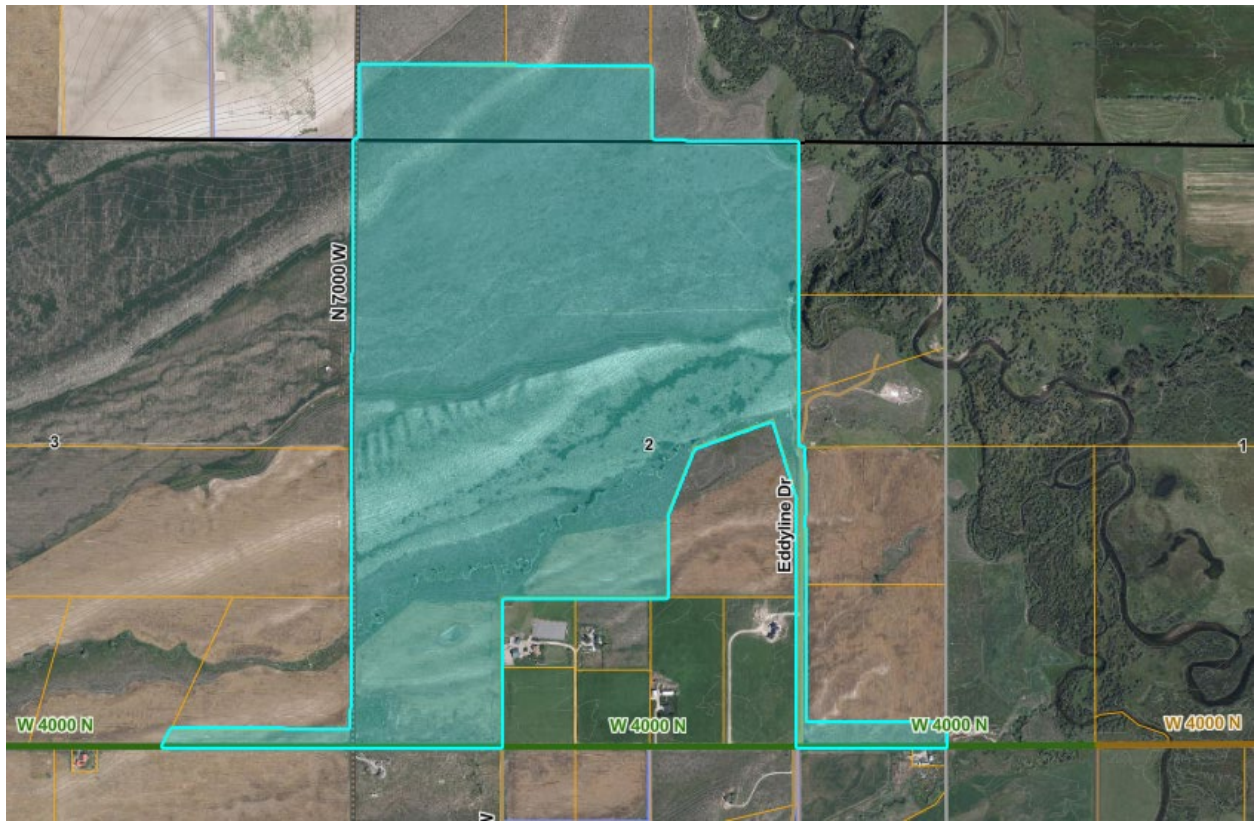


Figure 2. Aerial Image

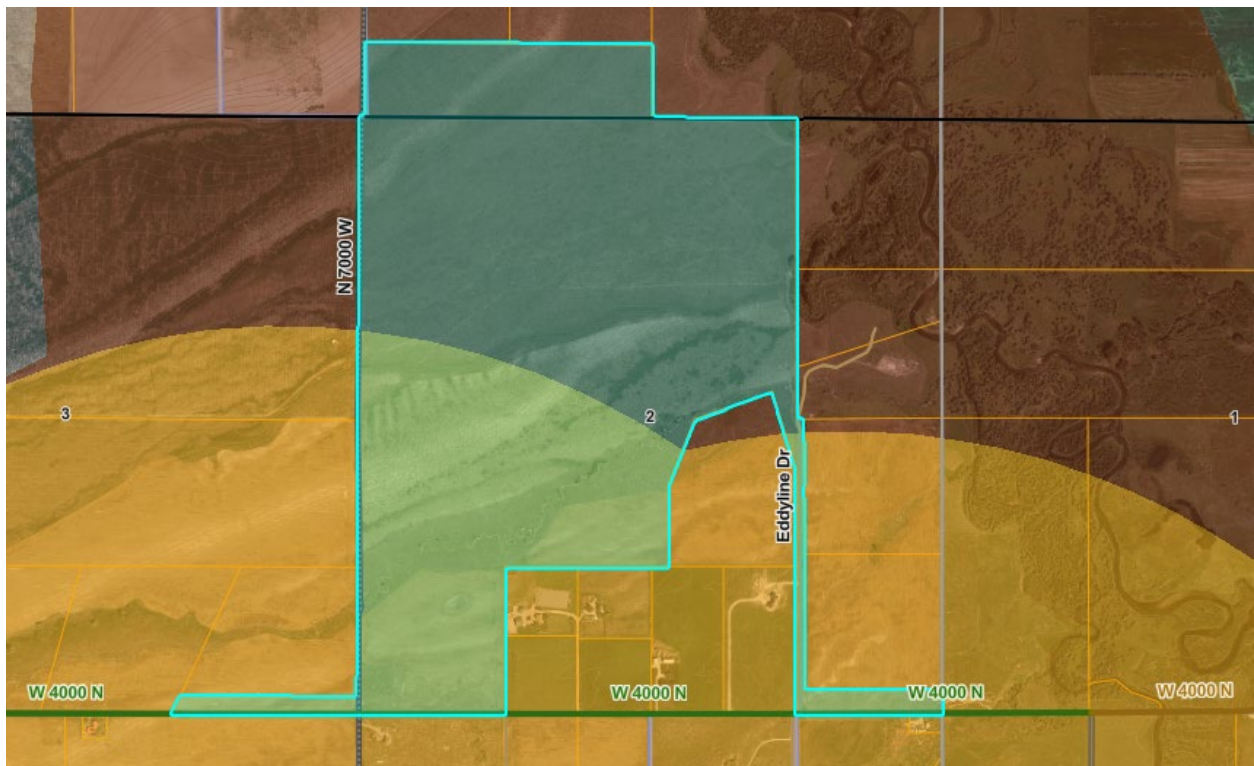


Figure 3: NROs present on parcel: Sharp Tailed Grouse, Big Game Migration Corridor & Seasonal Range



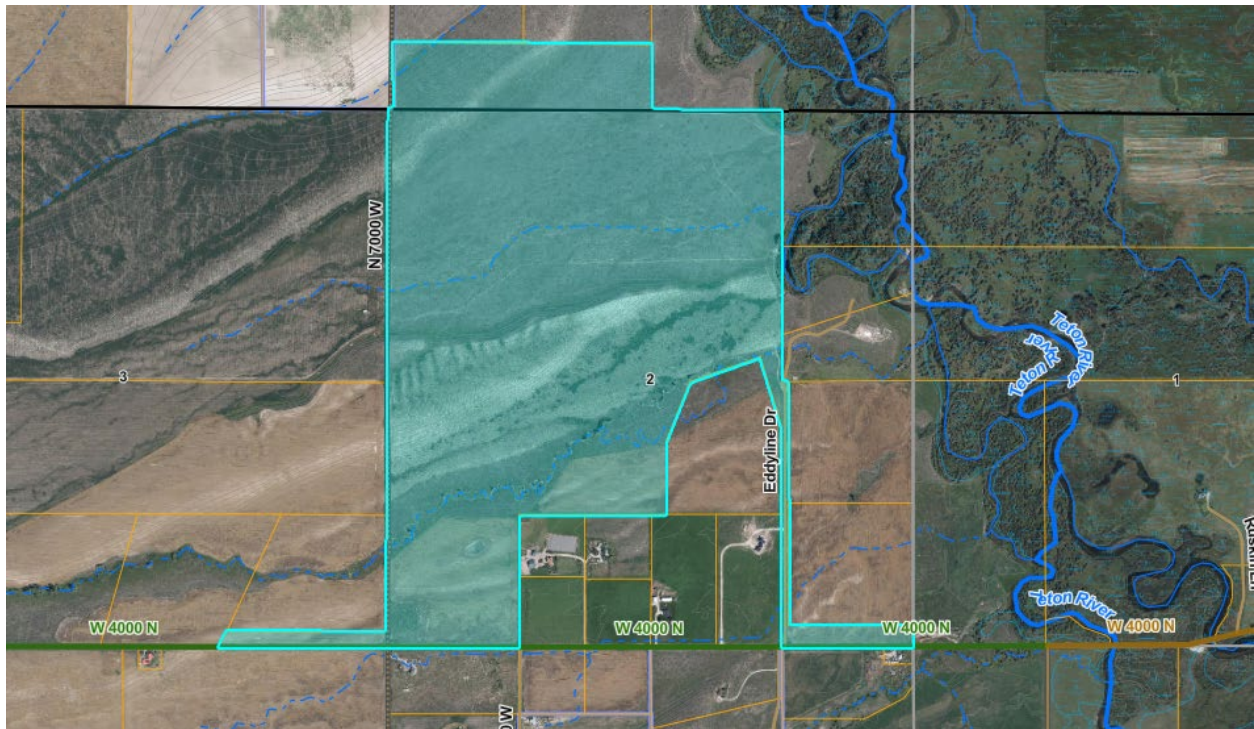


Figure 4. Hydrography / Irrigation Canal (North) & Packsaddle Creek (South)

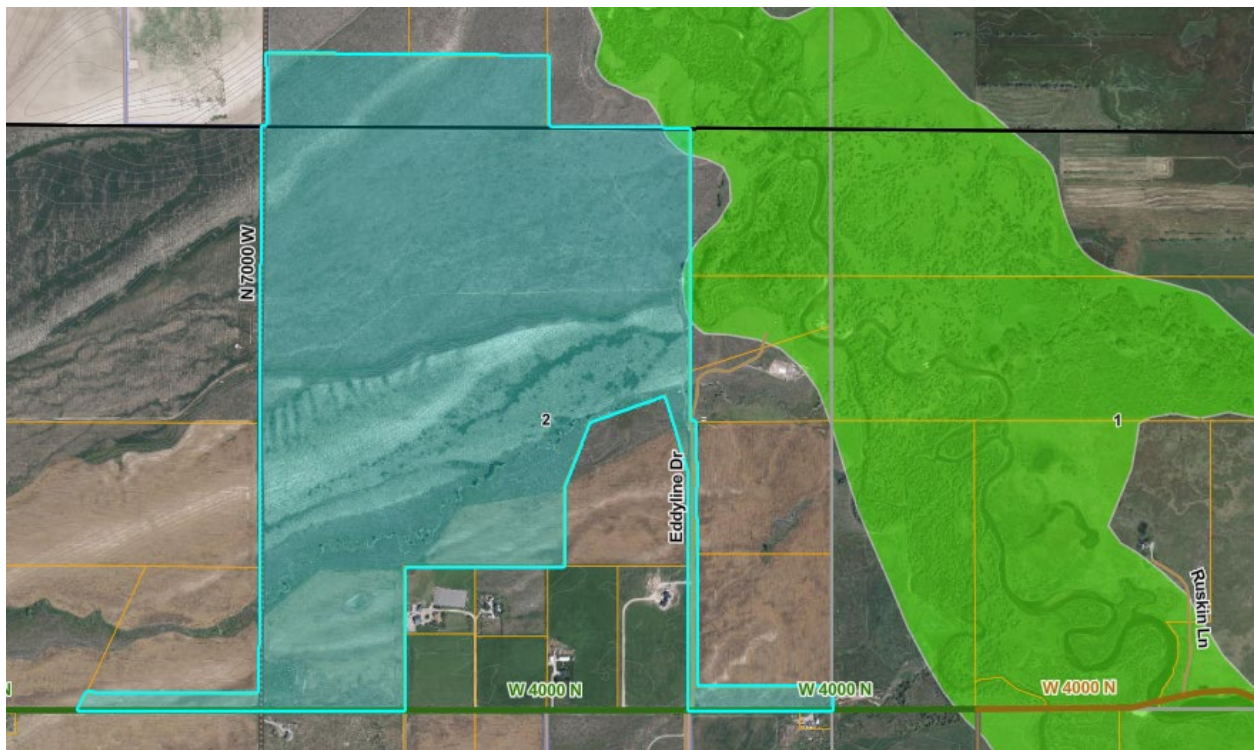


Figure 5. Effective Floodplain



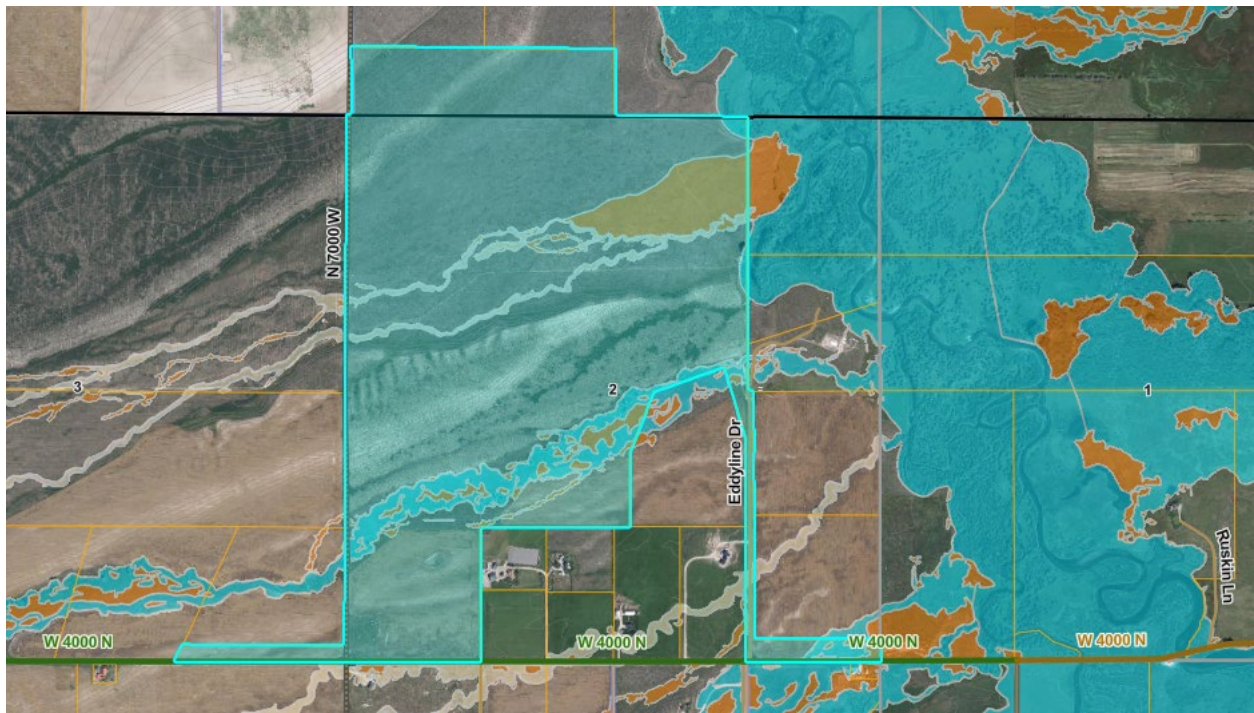


Figure 6. Preliminary Floodplain

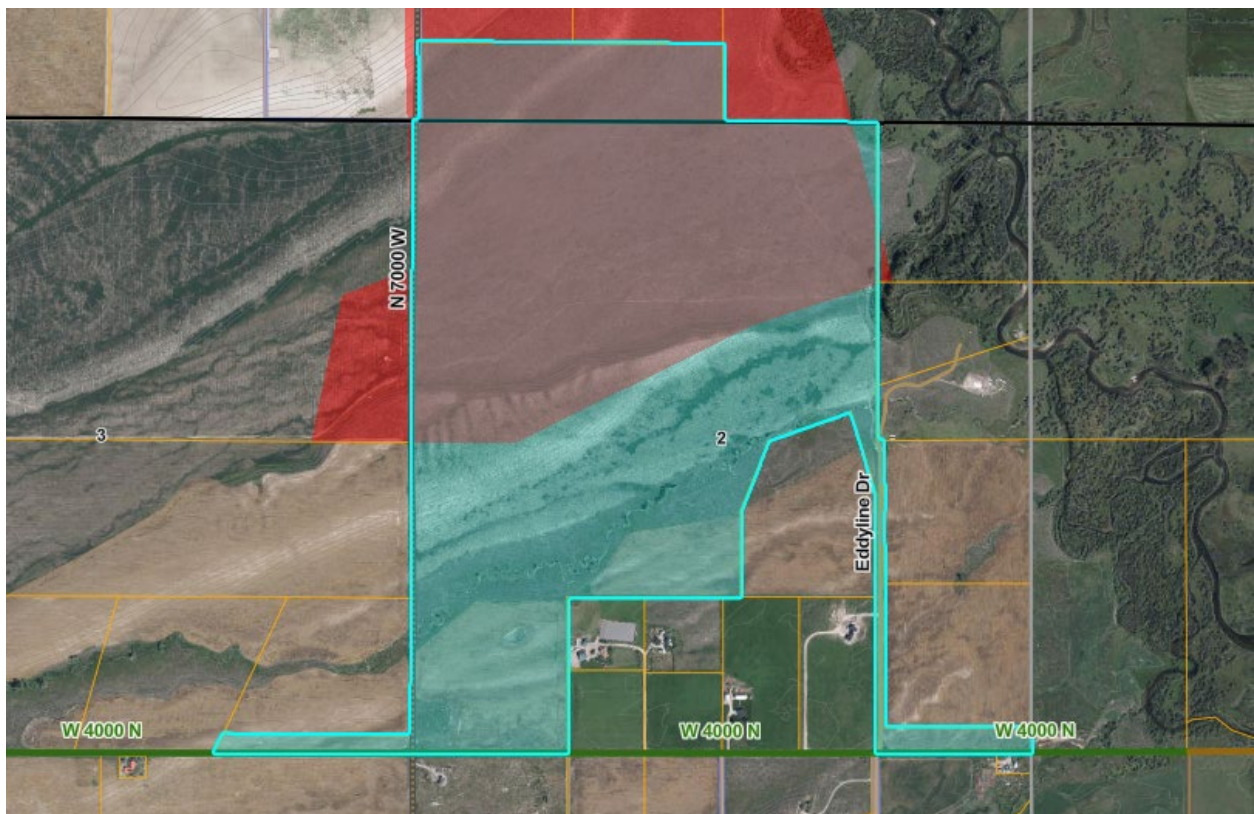


Figure 7. Wildfire Hazard Overlay (lots 1- 6 – potentially 7 and 8 are within the Wildfire Hazard Overlay)



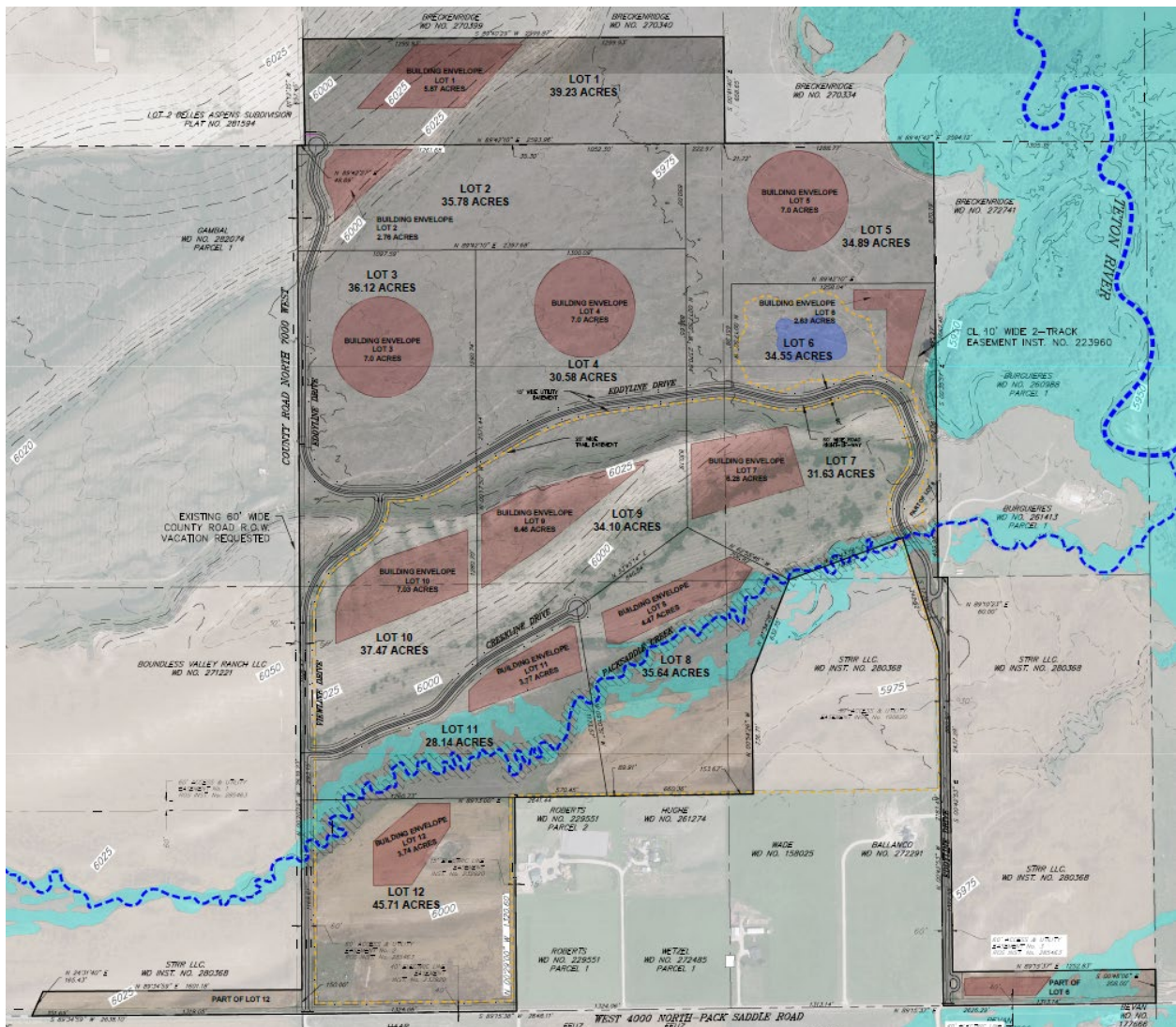


Figure 8. Proposed Preliminary Layout

## PROJECT BACKGROUND

Pre-application conference meetings were held with the applicant and Planning staff on January 30, 2023 as well as in April and May in 2024.

## Planning and Zoning Commission Concept Review:

The Planning and Zoning Commission reviewed and approved the Concept Plan application on September 10, 2024 with the following motion and conditions:

*Having concluded that the Criteria for Approval of a Subdivision Concept Plan found in LDC (LDC 4-1) can be satisfied with the inclusion of the conditions of approval 1-7 listed in the staff report, I move to APPROVE the Concept Plan for Eddyline Ranch Subdivision as described in the application materials submitted July 11, 2024 and as updated with additional applicant information attached to this staff report.*

## Conditions of Approval

1. The size of the pond should be reconsidered. Water rights documentation should be provided and approval from IDWR.
2. The size of building envelopes should be adjusted per the full WHA – which should incorporate an aquatic resources inventory.
  - a. Several stand to be reduced and removed from the floodplain, both regulatory and preliminary as well as wetlands.

- b. The building envelopes for lots 1 through 6 need to take the guidelines of LDC Section 5-4-3 into consideration. Building envelopes must allow for the development of all principal structures to be located within two hundred (200) feet of the primary public roadway.
  - c. Building envelopes should also be placed to avoid steep slopes (LDC 5-2-5).
  - d. Envelopes need to meet the wildfire hazard overlay requirements for lots that are within that overlay.
3. Receive preliminary approvals from EIPH.
4. Provide a cost estimate and improvement plans for improvements.
  - a. Financial surety of 125% of the cost estimate is required when the Development Agreement and Improvement Plans are recorded (which is after Preliminary Plat approval under the LDC).
5. Address all public works comments:
  - a. An access permit for the two access points from W 4000 N and N 7000 W is required before improvements can begin.
  - b. Any crossing of Packsaddle Creek would require permits from IDWR. Please submit with the preliminary plat application.
  - c. GIS slope analysis suggests proposed road grades exceed 10% in places. Maximum vertical grade for Local Road classification is 10%.
6. LLC paperwork and authorization to sign as an agent must be submitted for STRR LLC.
7. Applicant mentions recreational trails – this should be seen on the master plan and incorporated into any improvement plans. All riparian setbacks must be met.

*Staff Comment: Some building envelopes appear to still not meet the requirements of LDC Section 5-4-3. Applicant still needs to obtain approval from EIPH. No IDWR permits have been received for the pond. IDWR has indicated no stream alteration permits are necessary. Access permits still need to be obtained. Recreational trails are still not shown on the master plan. All other conditions have been met.*

The Planning and Zoning Commission reviewed the Preliminary Plat on March 11, 2025 and approved the application with the following motion:

- *Having concluded that the Criteria for Approval of a Subdivision Preliminary Plat found in LDC (LDC 4-13-D) can be satisfied, I move to APPROVE the Preliminary Plat Application for the Eddyline Ranch Subdivision as described in the application materials submitted January 13<sup>th</sup>, 2025, with the inclusion of additional applicant information attached to this staff report and the following conditions of approval...*
1. Building Envelopes
    - a. For lots 1 through 6 need to take the guidelines of LDC Section 5-4-3 into consideration. Building envelopes must allow for the development of all principal structures to be located within two hundred (200) feet of the primary public roadway.
    - b. Building envelopes should also be placed to avoid steep slopes (LDC 5-2-5).
  2. Receive preliminary approvals from EIPH prior to the BoCC Preliminary Hearing.
  3. Receive final approvals from Teton County Fire Marshal and Teton County Public Works Director prior to the Preliminary BoCC Hearing.
  4. IDWR permits will be required for constructing bridges over Packsaddle Creek. Applicant is to provide these permits before the BoCC Preliminary Hearing.
  5. The cost estimate needs to be stamped prior to the BoCC Preliminary Hearing.
  6. Financial surety of 125% of the cost estimate is required when the Development Agreement and Improvement Plans are recorded (which is after Preliminary Plat approval under the LDC).
  7. Address all public works comments:
    - a. An access permit for the two access points from W 4000 N and N 7000 W is required before improvements can begin.

- b. Any crossing of Packsaddle Creek would require permits from IDWR. Please submit with the preliminary plat application.
  - c. GIS slope analysis suggests proposed road grades exceed 10% in places. Maximum vertical grade for Local Road classification is 10%.
  - d. Interior road design incorporates a significant amount of fill. Public Works will be referencing the Improvement Plans for inspection of infrastructure. Improvements will need to be constructed per the Improvement Plans and meet County road standards in order to receive final approval.
8. Recreational trails should be shown on the master plan and incorporated into any improvement plans. All riparian setbacks must be met.

#### **OVERVIEW OF PRELIMINARY PLAT APPROVAL (4-13-D)**

The preliminary plat phase is a two-step process with review by both the Planning and Zoning commission and Board of County Commissioners, where the fact-finding details and specific requirements of the ordinance and law are determined. All of the issues surrounding required infrastructure will be resolved, or have a clear solution acceptable to the County, before scheduling the final plat review. The applicant will be granted permission to begin improvements following the BoCC's Preliminary Plat Approval Written Decision.

#### **INTER-AGENCY COMMENTS**

The County has solicited comment from other agencies and entities.

- **Roads & Utilities: Teton County Public Works Director** (Letter dated February 27<sup>th</sup>, 2025)
  - This subdivision is proposing 12 residential lots. A Traffic Impact Study requirement should be considered.
  - Interior road design incorporates a significant amount of fill. Public Works will be referencing the Improvement Plans for inspection of infrastructure. Improvements will need to be constructed per the Improvement Plans and meet County road standards in order to receive final approval.
- **Fire Protection: Teton County Fire Marshal** (Letter date April 28, 2025)
  - Eddyline Ranch is approved for fire department apparatus access and the proposed fire pond located on lot six for fire suppression.
- **Wastewater Treatment: EIPH**
  - The application is proposing individual wells as residential homes are built. The applicant will need to obtain EIPH preliminary approval prior to the BoCC Preliminary hearing.
- **Plans and Studies**
  - Wildlife Habitat Assessment:
    - Biota worked with the project design team to site building envelopes to maintain wildlife movement corridors to the extent feasible while maintaining development objectives. The team also worked to protect south-facing slopes and the Packsaddle Creek corridor to minimize impacts to the most valuable wildlife habitat. In addition, more than 80% of the project area will be maintained as open space.
    - The project area serves as habitat for big game, including indicator species mule deer, moose, and elk, as well as potential seasonal habitat for sharp-tailed grouse and staging sandhill cranes as they begin their migration south for the winter. The primary conservation priorities for this project are to design the project to

maintain habitat connectivity and open space, and to minimize impacts to the sagebrush steppe habitat, riparian habitat, and the surrounding ecotones.

- Aquatic Resources Inventory:
  - NWI mapping depicts palustrine emergent wetlands and riverine wetlands within the project area. Field data collected during this study confirmed that definitional wetlands are present within the project area. Subsequent mapping of wetland boundaries revealed that approximately 1.49-acres (64,856 sf) of the project area conformed to the definitional criteria for wetlands. Of the 7 sample points, all 3 wetland criteria were met at 3 sample points, and it was determined that these sample points were located in wetlands. All 3 wetland criteria were not met at 4 sample points, and it was determined that these sample points were located in upland areas. It appears that while some of the digressional areas and relic fluvial channels proximate to Packsaddle Creek have wetland vegetation present, a lack of hydric soils and wetland hydrology indicate these areas do not have sufficient hydrology to support wetlands. Delineated wetland locations and sample points are depicted in Appendix 1-Exhibit 5.

*Staff Comment: All building envelopes appear to be well outside of these delineated wetlands*

- **Idaho Department of Lands**
  - The State of Idaho owns all mineral rights on part of the project. Deed #D13448 records the section of lands.
- **Idaho Department of Water Resources** (Letter dated September 17, 2024)
  - The Idaho Department of Water Resources (IDWR) has reviewed your attached Joint Application for Permits, received June 20, 2024, including diagrams. Project activities include the construction of a variety of stream restoration treatments to improve fish habitat and maximize aquatic habitat in Packsaddle Creek. Stream restoration treatments include bioengineered bank stabilization treatments, channel narrowing with inset floodplain benches, sod mats, and plantings. It has been determined that an IDWR Stream Channel Alteration Permit will not be required for this activity as provided for within Section 42-3802(d), Idaho Code.

#### **SPECIFIC REQUIREMENTS FOR PUBLIC HEARING NOTICE**

Idaho Code, Title 67, Section 67-6509, 67-6511, 67-6512, and LDC, Chapter 4-2-D. The public hearing for the Board of County Commissioners was duly noticed in the Teton Valley News on April 9 and 16, 2025. A notification was sent via mail to surrounding property owners within a 300-foot buffer area, on April 4, 2025. A notice was also posted on the property providing information about the public hearing on April 15, 2025.

#### **PUBLIC COMMENTS**

No public comments have been received as of April 23, 2025.

#### **CRITERIA FOR APPROVAL**

For approval of Preliminary Plat Review of a proposed subdivision (LDC 4-13-D), the County shall consider the objectives of Teton County LDC, application materials, and in a general way, at least the following:

<b>Objective:</b> 1. The conformance of the subdivision with the Comprehensive Plan, LDC and other County Codes as well as Subdivision Development Standards;
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**Applicant Comment:**

Narrative states application will conform to all County codes and standards.

**Staff Comment:** The proposed project lies within the Rural Agriculture, Mixed Agriculture / Wetland, and Waterway Corridor areas.

**Rural Agriculture:** Rural Agriculture areas are located on the north and western sides of the valley and include much of the most productive agricultural land due to soils present. Some lands are better agriculture ground than others due to microclimates. Much of this area, especially the land located on the western side, is important wildlife habitat. Because the Rural Agriculture areas are located far from existing towns, public water and sewer services are not available. Desired future character and land uses for the Rural Agriculture areas include:

- Agriculture
- Ranching

**Mixed Agriculture / Wetland:** Mixed Agriculture Wetland areas are located immediately east of the Teton River on the valley floor and include lands that are classified as wetlands and floodplains as shown on the U.S. Fish and Wildlife Service National Wetlands Inventory and the Federal Emergency Management Agency Flood Insurance Rate Map. These areas have seasonally important wildlife resources, are predominately rangeland and agriculture land, and have high scenic qualities. Desired future character and land uses include:

- Agriculture
- Ranching
- Low density residential development, with provisions for clustering/conservation development to protect natural resources
- Conservation and wildlife habitat enhancement/protection
- Development subject to all applicable County, State and Federal regulations including U.S. Army Corps of Engineers (USACE) wetland regulations and County floodplain development regulations
- Development regulated by overlays and development guidelines to protect natural resources

**Waterway Corridors:** Waterway Corridors include the land adjacent to the Teton River and its major tributaries. These areas include the riparian areas, wildlife habitat, wetlands and floodplains associated with the streams and are important fish and wildlife habitats. Public access to the Teton River is currently available in limited locations. The majority of the existing parcels in this area are large, although there are a few older, developed subdivisions along the Teton River. Public water and sewer service is not available. Desired future character and land uses include:

- Agriculture
- Low to lowest residential density in the County
- Conservation and wildlife habitat enhancement
- Development subject to all applicable County, State and Federal regulations including USACE wetland regulations and County floodplain development regulations
- Scenic quality preservation
- Public access points for river recreation
- Overlays and development guidelines to protect natural resources
- Little to no (or very limited) commercial activity

- The zoning of the parcel is RA-35 acre average density. The proposed lots will conform to this requirement as the minimum lot size is one acre and the density calculation allowed is 12 lots.
- The applicant is planning to do rehabilitation and wildlife mitigation to improve fish habitats and ensure big game migration corridors stay intact to the greatest extent possible. Applicant is to work with the USACE and IDWR to ensure all work done in the floodplain and waterways is compliant with codes and regulations.
- Staff suggested more clustering in the initial review of the WHA. Applicant would like to maintain the 12, larger lot sizes.

**Objective:** 2. Requirements of other reviewing agencies and / or jurisdictions providing public services.

**Applicant Comment:**

N/A

**Staff Comment:**

Applicant will need to engage EIPH for individual septic reviews. The applicant will work with the Teton County Fire Marshal to confirm fire suppression for the preliminary plat stages.

**Objective:** 3. The conformity of the proposed development with the Capital Improvements Plan (CIP).

**Applicant Comment:**

No comment.

**Staff Comment:**

All applicable impact fees based on the Impact Fee Program (2023 CIP) will be assessed at the time of building.

**Objective:** 4. The public financial capability of supporting services for the proposed development.

**Applicant Comment:****AVAILABILITY OF PUBLIC SERVICES****Other Public Services**

The development is within the Teton County School District 401 for educational facilities. Police protection will be provided by the Teton County Sheriff's Department. Solid waste disposal will be provided by Teton County's solid waste collection provider. Hospital services will be provided by Teton Valley Health Care. Maintenance of the subdivision roads and pond will be managed by the subdivision Homeowners Association.

The property is located in Tax Code Area 0140000 which had a levy rate of .003566484 in 2023. Annual property taxes would be \$475 for the 423.0 acre properties at the above rate based on the current assessed value of \$133,083.

The projected assessed land value for the properties once subdivided and improved based upon assessed values of equally sized improved properties in the vicinity would be \$66,500 per lot. The estimated improvements value would be approximately \$650,000 per lot based upon equally sized improved lots in the vicinity thus, the total estimated assessed value per lot would be \$716,500 or \$8,595,000 for the total 423 acres. At the 2023 tax rate with the increased assessed value estimates, 12 lots would provide \$30,664.63 of annual tax revenue to the city (Figure 4.)

ESTIMATED ANNUAL TAX REVENUE								
Eddyline Ranch Subdivision								
Dated: 7/09/2024								
CURRENT TAX REVENUE (2023) - EXISTING PROPERTY								
Total Area of Property (acres):			423.00					
Current Assessed Land Value:			\$133,083					
Current Assessed Improvements:			\$0					
Current Total Assessed Value:			\$133,083					
Tax Levy Rate (2023-Tax Code Area 0140000):			0.003566484					
Tax Revenue (2023):			\$475					
ESTIMATED TAX REVENUE - PROPOSED SUBDIVISION								
LOT AREA (acres)	ESTIMATED ASSESSED LAND VALUE (PER ACRE)	ESTIMATED ASSESSED LAND VALUE (PER LOT) *	ESTIMATED ASSESSED IMPROVEMENTS VALUE (PER LOT)	ESTIMATED TOTAL ASSESSED VALUE (PER LOT)	2023 LEVY RATE	ESTIMATED TAX REVENUE (PER LOT)	PROPOSED NUMBER OF LOTS	ESTIMATED TAX REVENUE (TOTAL)
423.0	\$1,900	\$66,500	\$650,000	\$716,500	0.003566484	\$2,555	12	\$30,664.63

**Staff Comment:**

Because this proposal is for fewer than 20 lots, a public services/ fiscal impact analysis will not be required with Preliminary Plat application materials.

**Objective:** 5. Other health, safety, or general welfare concerns that may be brought to the County's attention. Impacts presented from any studies requested related to natural resource overlays, economic impacts, or traffic studies.

**Staff Comment:**

The parcel lies within regulatory floodplain, natural resource overlays, hydrography overlays, and the wildfire hazard overlay. However, thoughtfully placed building envelopes can avoid development in these areas. There is an area of steep slopes, but the proposal can also easily avoid those areas on the parcel.



The Wildlife Habitat Analysis and the Wetland Delineation indicate that the development has been clearly guided by the results of these reports. The building envelopes have been thoughtfully placed to co-exist with the natural wildlife and important habitats.

## **CONSIDERATIONS**

- Subdivision and road names have been approved by the Teton County GIS Manager.
- The size of the proposed pond was originally 5.47 acres in size. The size should be reconsidered if the use is for a fire pond. If the pond is for recreation, permits may be required from IDWR and USACE.
- This subdivision is proposing 12 residential lots. A Traffic Impact Study requirement should be considered.
- A nutrient pathogen evaluation may be requested as Packsaddle Creek is a named stream for Teton County. Staff is unsure of applicability based on 6-6-2:

### **6-6-2 Applicability**

#### **A. This section applies to:**

1. *Subdivision developments in the TN, RN, IR, RA, RR, and FH zone districts with 30 acres or less average density with standard on-site septic systems or 20 acres or less average density with advanced nutrient reducing on-site septic systems.*
2. *Subdivision developments in the LA zone district with 75 acres or less average density with standard on-site septic system or 40-acres or less average density with advanced nutrient reducing on-site septic systems.*
3. *Subdivisions that lie within Nitrate Priority Areas identified by Idaho Department of Environmental Quality (DEQ) and all proposed Large Soil Absorption Systems (LSAS), both of which require a Nutrient Pathogen Evaluation submitted to DEQ.*

Staff finds that based on the proposed density and zoning, the property does not trigger the threshold for a nutrient pathogen evaluation.

- A subdivision application does not entitle anything beyond residential entitlements granted to all lots of record (one principal structure and one accessory dwelling unit). The proposed “ranch camp clubhouse” cannot be for commercial purposes.

## **CONDITIONS OF APPROVAL**

1. Building Envelopes
  - a. For lots 1 through 6 need to take the guidelines of LDC Section 5-4-3 into consideration. Building envelopes must allow for the development of all principal structures to be located within two hundred (200) feet of the primary public roadway.
  - b. Building envelopes should also be placed to avoid steep slopes (LDC 5-2-5).
2. Receive preliminary approvals from EIPH prior to the BoCC Preliminary Hearing.
3. Receive final approvals from Teton County Fire Marshal and Teton County Public Works Director prior to the Preliminary BoCC Hearing. **Final approval was received from the Fire Marshal on April 28, 2025**
4. IDWR permits will be required for constructing bridges over Packsaddle Creek. Applicant is to provide these permits before the BoCC Preliminary Hearing.
5. The cost estimate needs to be stamped prior to the BoCC Preliminary Hearing.
6. Financial surety of 125% of the cost estimate is required when the Development Agreement and Improvement Plans are recorded (which is after Preliminary Plat approval under the LDC).
7. A. All roads and public improvements must have a warranty guaranteeing the work against defects for a period of two (2) years from the date of final acceptance.  
B. If the improvements are constructed at different times, then the guarantee must continue until

two (2) years from the date of final acceptance of the improvement last completed.

C. The warranty must list Teton County as a beneficiary.

D. A warranty surety must be provided in an amount of ten percent (10%) of the estimated value of the warranted improvements. The surety must expire six (6) months after the expiration of the warranty period.

8. Address all public works comments:

- a. An access permit for the two access points from W 4000 N and N 7000 W is required before improvements can begin.
- b. Any crossing of Packsaddle Creek would require permits from IDWR. Please submit with the preliminary plat application.
- c. GIS slope analysis suggests proposed road grades exceed 10% in places. Maximum vertical grade for Local Road classification is 10%.
- d. Interior road design incorporates a significant amount of fill. Public Works will be referencing the Improvement Plans for inspection of infrastructure. Improvements will need to be constructed per the Improvement Plans and meet County road standards in order to receive final approval.

9. Recreational trails should be seen on the master plan and incorporated into any improvement plans. All riparian setbacks must be met.

*Applicant has addressed the conditions of approval from the PZC hearing in attachment V. Staff concurs with the applicant's responses in general. Further discussion of Wildfire Hazard overlay (condition 1. a.) may be appropriate.*

#### **BOARD OF COUNTY COMMISSIONERS ACTIONS**

- A. Approve the Preliminary Plat Application, with the possible conditions of approval listed in this staff report, having provided the reasons and justifications for the approval.
- B. Approve the Preliminary Plat Application, with modifications to the application request, or adding conditions of approval, having provided the reasons and justifications for the approval and for any modifications or conditions.
- C. Deny the Preliminary Plat application request and provide the reasons and justifications for the denial.
- D. Continue to a future PZC Public Hearing with reasons given as to the continuation or need for additional information.

#### **MOTIONS**

The following motions could provide a reasoned statement if a Commissioner wanted to approve or deny the application:

#### **APPROVAL**

- *Having concluded that the Criteria for Approval of a Subdivision Preliminary Plat found in LDC (LDC 4-13-D) can be satisfied, I move to APPROVE the Preliminary Plat Application for the Eddyline Ranch Subdivision as described in the application materials submitted January 13<sup>th</sup>, 2025, with the inclusion of additional applicant information attached to this staff report and the following conditions of approval...*

#### **DENIAL**

*Having concluded that the Criteria for Approval of a Subdivision Concept Plan found in LDC (LDC 4-13-D) have not been satisfied, I move to DENY the Preliminary Plat Application for the Eddyline Ranch Subdivision as described in the application materials submitted January 13<sup>th</sup>, 2025 and as supplemented with additional applicant information attached to this staff report.*

#### **CONTINUATION**



*I move to continue the public hearing for Eddyline Ranch Subdivision to a **specific date and time** in order to obtain additional information from the applicant or reviewing agencies.*

*Prepared By*

*Mitzi Van Arsdell*

*Reviewed By*

*Joshua Chase, Planning Administrator*

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**ATTACHMENTS:**

- |  |   |
|--|---|
| A. Application (3 pages)                 | N. Aquatic Resource Delineation (46 Pages)        |
| B. Narrative (5 pages)                   | O. LLC Operating Agreement (9 Pages)              |
| C. Prelim Plat (2 pages)                 | P. Public Works Review                            |
| D. Master Plan (1 Page)                  | Q. Fire Marshal Review (1 page)                   |
| E. Revised Improvement Plans (51 Pages)  | R. Warranty Deed (5 Pages)                        |
| F. CCRS (56 Pages)                       | S. EIPH Application (2 Pages)                     |
| G. Development Agreement (17 Pages)      | T. Water Rights Transfer Approval<br>(9 Pages)    |
| H. Revised Cost Estimate (1 Page)        | U. Idaho Department of Lands Email<br>(1 Page)    |
| I. Letter of Credit (4 Pages)            | V. Conditions of approval responses<br>(36 Pages) |
| J. Wildlife Habitat Analysis (47 Pages)  |   |
| K. IDWR Permit (1 Page)                  |   |
| L. Geotechnical Investigation (44 Pages) |   |
| M. Affidavit (1 Page)                    |   |

**End of Staff Report**