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Teton County Idaho Jade Krueger Planning Administrator jkrueger@co.teton.id.us

Harmony Design & Engineering
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RE: Response to Comments on the JC Ranches Subdivision Level I Nutrient-Pathogen Evaluation

Dear Ms. Krueger, Ms. Zung, and Mr. Van Holland,

Thank you for your review of the Level I Nutrient Pathogen (NP) Evaluation for the JC Ranches Subdivision. For clarification, I have restated the comments received along with the response to those comments below.

1. Compliance Boundaries

The compliance boundaries are selected to consider lots 1 though 8, and separately lots 9 though 26, as well as each lot independently. The compliance boundaries for the two combinations should be depicted on a dimensioned drawing for closer examination. Further justification should be provided for this division, as the only discussion is "...other combinations of lots did not make sense," (p.9 of 15).

Since there are wetlands and an irrigation canal on site and the report presents evidence of surface water and groundwater interaction, surface water should be added as a compliance boundary.

A dimensioned drawing has been provided to allow for easier examination of the proposed compliance boundaries. The irrigation canal and the wetlands have been added as compliance boundaries. Additional combinations of lots have been added to the NP Evaluation.

Please also note that the subdivision layout has been reconfigured on the east side. There are fewer lots, and the open space parcel has been increased in size.



2. <u>Contradictory Conclusion Language</u>

The conclusion initially states that soils allow for traditional septic systems. This is followed by a distinction that implies some lots will be required to employ Extended Treatment Packaged Systems (Advanced) systems. Elsewhere in the text, as well as the level 1 spreadsheets, the value of 32 mg/L nitrate is used, corresponding to the more effective treatment discharged by ETPS. The conclusion should also mention that the ETPS systems must be approved for reductions in nitrate, as some types of ETPS are not rated for nutrient reduction (i.e. NSF 245). Additionally, please make clear in the conclusion that the analysis was completed assuming only one (1) four bedroom home per lot or a wastewater flow of 300 gpd. The guest homes may not be allowed on the proposed lots.

The conclusion has been updated to be clearer. Advanced/Extended Treatment Package Systems that are approved for nutrient reduction shall be required for each lot. With the new subdivision layout, the bedroom restriction is 5 for a single-family house.

Thank you for your time spent on this project.

Sincerely,

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