



July 19, 2023

By email: mvanarsdell@co.teton.id.us

Mitzi Van Arsdell
Teton County P&Z
150 Courthouse Drive Rm 107
Driggs, ID 83422

**Re: Teton County, Irish Acres Subdivision Water Quality Impact Analysis
Nutrient/ Pathogen (NP) Evaluation. DEQ # 23-17-41**

Dear Mrs. Arsdell,

Teton County has required the preparation of a Water Quality Impact Analysis (NP Evaluation) for the proposed development pursuant to the Teton County Subdivision Ordinance. Teton County has requested DEQ review the NP Evaluation. This letter contains DEQ's comments and recommendations regarding the NP Evaluation. This letter does not constitute and approval, license, permit, or any other form of authorization required by law. The comments and recommendations contained in this letter are provided to Teton County for its consideration in reviewing the development pursuant to Teton County law. This letter reflects DEQ's opinion, based upon the information and analysis in the (Engineer Stamped) **September 13, 2022**, NP Evaluation, regarding whether the discharges from wastewater systems for the proposed development will comply with the Idaho Ground Water Rule and Idaho Water Quality Standards.

After our review of the NP evaluation DEQ has the following comments:

1. Additional justification for the 100 ft/day hydraulic conductivity should be given. The Nicklin model overlay should be consulted and reviewed to verify range of Hydraulic conductivity, or a grain size analysis used for characterization of the hydraulic conductivity.
2. The NP evaluation discusses the nutrient impacts to ground water using mass balance spread sheet. The NP evaluation has not addressed the fate transport of pathogens. The NP evaluations needs to be modified to address the fate transport of pathogens.

If you have any questions regarding this letter or if we can be of further assistance, please call (208) 528-2650.

Sincerely,

A handwritten signature in black ink, appearing to read "William Teuscher". The signature is fluid and cursive, with the first name being more prominent.

William Teuscher PE
Water Quality Engineer Idaho Falls Regional Office

2023AFM1052

CC: Kathleen Price, EIHD, KPrice@eiph.idaho.gov
Seied Zia A. Yasrobi, PE, Y2 Consultants, LLC, Zia@y2consultants.com
Adrienne Lemmers, Y2 Consultants, LLC, adrienne@y2consultants.com



September 27, 2023

By email: mvanarsdell@co.teton.id.us

Mitzi Van Arsdell
Teton County P&Z
150 Courthouse Drive Rm 107
Driggs, ID 83422

Re: Teton County, Irish Acres Subdivision Revised Water Quality Impact Analysis Nutrient/ Pathogen (NP) Evaluation. DEQ # 23-17-41

Dear Mrs. Arsdell

Teton County has required the preparation of a Water Quality Impact Analysis (NP Evaluation) for the proposed development pursuant to the Teton County Subdivision Ordinance. Teton County has requested DEQ review the NP Evaluation. This letter contains DEQ's comments and recommendations regarding the NP Evaluation. This letter does not constitute an approval, license, permit or any other form of authorization required by law. The comments and recommendations contained in this letter are provided to Teton County for its consideration in reviewing the development pursuant to Teton County law. This letter reflects DEQ's opinion, based upon the information and analysis in the **revised September 25, 2023**, NP Evaluation, regarding whether the discharges from wastewater systems for the proposed development will comply with the Idaho Ground Water Rule and Idaho Water Quality Standards.

After our review of the revised NP evaluation DEQ concurs with the finding of the report. The NP evaluation has indicated that there will not be significant degradation to the ground water or surface water from the individual subsurface disposal systems if constructed per the current *Individual Subsurface Sewage Disposal Rules IDAPA 58.01.03 and the Technical Guidance Manual*.

The East Idaho Public Health will need to verify compliance with the Rules for Individual Subsurface Disposal Systems IDAPA 58.01.03 and the Technical Guidance Manual (TGM) requirements when issuing the subsurface disposal permits. All separation distances and

effective soil depths will need to be met.

If you have any questions regarding this letter or if we can be of further assistance, please call (208) 528-2650.

Sincerely,



William Teuscher PE
Water Quality Engineer
Idaho Falls Regional Office

2023AFM1052

- C: Kathleen Price, EIHD, KPrice@eiph.idaho.gov
Seied Zia A. Yasrobi, PE, Y2 Consultants, LLC, Zia@y2consultants.com
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