



To: Jade Kruger; Teton County Planning and Zoning Commission
Re: High Noon Ranch Rural Reserve PUD Concept Plan Application

Please accept this written comment, on behalf of Friends of the Teton River, on the concept plan application submitted for the proposed High Noon Ranch Rural Reserve PUD.

The mission of Friends of the Teton River is to restore and conserve the Teton River Watershed, ensuring a lasting legacy of clean water, healthy streams, and a thriving wild fishery. We implement programs and projects founded on sound science, community education, and cooperation with landowners, citizens, and agency partners.

As such, comments from FTR are often requested by our partners, stakeholders, and/or agency partners on land use changes that may have an impact on water resources. We approach these comments from a scientific standpoint, and try to ensure that our comments reflect the best science available to us at the time of writing.

FTR is concerned that the applicant has not completed the due diligence necessary to determine whether there is adequate water legally available to complete the proposed project. Significant issues with water availability in this region require that a thorough review of water resources should be undertaken in determining whether the proposed development is feasible at this location.

The County's Concept Plan Application Form requires that the applicant submit detailed information on Water Resources, and the County provides a checklist for the items that must be included. High Noon Ranch has failed to meet this requirement, as they have failed to include the following required checklist items:

- a description of the proposed irrigation system
- a description of the proposed culinary water system
- information on the water rights that will be used to supply irrigation, culinary water, and fire protection for the proposed project

There are few culinary wells on the west side of Teton valley, in large part because groundwater is deeper and less plentiful than in other parts of the valley. Individual private wells that do exist in these western highlands are deep, and previously proposed developments in the western foothills (including West Ridge Ranch and Canyon Creek Ranch) have been plagued by significant water issues. It is likely that the proposed High Noon Ranch will face similar issues with groundwater availability.

Additionally, both surface and groundwater rights in this region in general, and in Teton Valley specifically, are coming under increasing scrutiny. It is likely that groundwater curtailments, similar to those seen in the Eastern Snake Plain region, will be experienced in the future. This



could significantly impact any new water rights that High Noon Ranch attempts to secure, unless they can provide assurance that they are legally and physically capable of providing mitigation.

We request that, prior to approving any further progress on this application, Teton County require that the applicant provide detailed information about water resources for this proposed project.

This information should include:

- A detailed description of the proposed irrigation system for all agricultural acres, open space, and residences, and the volume of water needed to support the proposed uses. This should include a detailed assessment of whether enough water is physically available in this location to meet the proposed irrigation needs.
- A detailed description of the proposed culinary water system for all public buildings and facilities, as well as all proposed private residences, and the volume of water needed to support the proposed uses. This should include a detailed assessment of whether enough water is physically available in this location to meet the proposed culinary water needs.
- A detailed description of the proposed ponds and water features, as well as the proposed fire water system, and the volume of water needed to support the proposed uses. This should include a detailed assessment of whether enough water is physically available in this location to meet the proposed pond, water feature, and fire water needs.
- Detailed information on the water rights associated with this property. This report should confirm that the applicant has fully secured the legal rights to divert the total quantity of ground and/or surface water that will be required to meet the combined total of the proposed irrigation, public and private culinary, and pond/water feature/fire water that is proposed in the application.

Please let me know if you have questions or need additional information.

Sincerely,

Amy Verbeten
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