

Dear Chair and Commissioners,

Project Big Wood does not oppose the Guyer Hot Springs subdivision concept and appreciates the applicant's proposal to preserve Block 3, protect geothermal infrastructure, retain a riparian corridor, and concentrate development outside identified environmental and hazard constraints.

Because this application establishes the long-term framework for approximately 20 residential units adjacent to Warm Springs Creek, including five Phase I lots and a conceptual 15-unit Phase II, PBW encourages the Commission to ensure that the development agreement, plat notes, and conditions of approval provide enforceable protections across the entire project—not only the first phase. The applicant describes wetlands and riparian areas as remaining undisturbed and Block 3 as being retained in a natural state, but those commitments should be clearly incorporated into recorded and enforceable project documents.

PBW respectfully requests clarification and appropriate conditions in the following areas:

Drainage and groundwater

The Phase I drainage concept relies on catch basins, storm pipe, dry wells, and gravel swales. This may be appropriate, but the City should confirm that the system is supported by site-specific infiltration testing, seasonal-high groundwater information, adequate separation between dry wells and groundwater, and a defined nonerosive overflow route. The analysis should also explain how the system would function during frozen-ground conditions and how future Phase II development would affect drainage capacity.

Sewer construction and dewatering

The proposed gravity sewer layout appears conventional, but trenching may occur in relatively low and potentially groundwater-influenced portions of the site. Before construction, PBW recommends approval of a project-specific dewatering plan that identifies treatment methods, discharge locations, monitoring, and safeguards against turbid or sediment-laden water reaching Warm Springs Creek, wetlands, dry wells, or the storm system. The final design should also prevent sewer bedding from acting as a permanent groundwater drain and address infiltration or buoyancy where groundwater is expected.

Floodplain cut and fill

The plans identify approximately 470 cubic yards of cut, 760 cubic yards of fill, and 290 cubic yards of net fill, with more than three acres of total disturbance including right-of-way work. PBW requests a floodplain-specific earthwork analysis that distinguishes cut and fill below the

applicable base flood elevation, identifies any work within the floodway, and demonstrates that the project will not reduce flood storage, redirect flood flows, or increase risk to neighboring properties. Site-wide cut and fill totals alone do not establish equivalent floodplain compensation.

Riparian protection and public access

The plat proposes a ten-foot fisherman's and nature-study easement along Warm Springs Creek, but the application apparently does not provide a direct legal and functional connection from the subdivision or public roadway to that easement. A creekside easement has limited public value if it cannot be safely reached.

Before final plat, PBW recommends that the applicant coordinate with the City and Idaho Fish and Game to determine whether a safe, low-impact connection can be established from Warm Springs Road, the subdivision common area, or another appropriate location. The easement should be allowed to shift or widen where necessary to respond to topography, wetlands, bank conditions, or geothermal infrastructure. The easement should be located along the ordinary high water mark when possible and allowed to shift as the creek shifts. PBW does not recommend automatically converting the entire 25-foot riparian setback into an active public trail corridor, as doing so could increase vegetation loss and bank disturbance. The goal should be a meaningful but narrow and environmentally responsible access route.

The application also references potential geothermal discharge pipes or "tailpipes" along the creek embankment. The development agreement should identify the anticipated location and function of those facilities and require appropriate permitting, temperature controls, erosion protection, and water-quality safeguards. Undefined future geothermal infrastructure should not be used as a generalized reason to eliminate an otherwise feasible public-access connection.

Overall, PBW supports a continued review focused on making the subdivision's environmental commitments enforceable and ensuring that the drainage, sewer, floodplain, riparian, and public-access components are fully resolved before final approval.

Thank you for your consideration.

With Gratitude,

Ananda Bannan and the team at Project Big Wood

Executive Director



mendit@projectbigwood.org



208-309-3457



PO Box 5006, Ketchum, ID 83340