



December 17, 2021

Teton County Board of County Commissioners

Dear Chair Macker and Commissioners,

Thank you for addressing water quality through an update to Teton County's small stormwater facility (SWF or septic) regulations. At the Alliance, we have a vision of healthy headwaters and Wild and Scenic waterways on public lands; healthy local creeks, healthy wildlife that depends on them, and safe drinking water, with water quality meeting Clean Water Act standards. Today's reality is far from that vision, with impaired creeks and unsafe water creating serious issues for residents and visitors.

The septic regulations are one critical element of protecting our water quality. Water quality affects everyone in the Town of Jackson and will only get worse if it's not addressed promptly. The current draft is **not yet effective enough** to solve the issues affecting the wellbeing of Teton County Residents. We support the campaign by Protect Our Waters JH and the Wyoming Outdoor Council to improve these draft regulations, and we echo their concerns:

Throughout the county, there are hundreds of unpermitted septic systems, many of which could be decades old and not up to standard. Leaving these unpermitted systems and recently approved systems unaddressed will further damage our water quality. The aquifer provides drinking water for **the entire population of the region** and there is no alternative drinking water source available if it becomes contaminated.

1. The regulations should be rewritten to apply to failed systems, systems operating in violation of past rules, and a clear definition of what constitutes a modification requiring the new regulations.
2. The proposed amendments fail to address the need for a program for **inspections** of existing septic systems. We know poorly maintained septic systems are contributing to the degradation of our waters.
3. Teton County has failed to complete **Source Water Protection Plans** for most of its 113 Public Water Supplies. Teton County needs to prioritize and have the authority to complete Source Water Assessments and create Source Water Protections plans for Public Water Systems.

We appreciate that Teton County has begun to allocate additional resources to tackle water quality concerns, and we fully support the Comprehensive Water Quality Plan. Please also improve the SWF regulations along the lines suggested by POW JH.

Sincerely,

A handwritten signature in black ink that reads "Kyle Fowler".

Kyle Fowler  
Community Planning Associate  
Jackson Hole Conservation Alliance