September 29, 2026

Driggs City Council
& Driggs Planning & Building Director Jade Krueger
60 South Main Street
Driggs, Idaho 83422

RE: Request for reconsideration NARRATIVE of Corona Valley Preliminary Plat.

Dear Council Members and Staff:

This firm hereby submits the following request for reconsideration of the Corona Valley Preliminary Plat ("Project" or "Corona Valley") on behalf of the following 28 individuals:

1. Brett and Elizabeth Bowhan: abutters to the Project along Ross.
2. Dawn and Delaney Smith: abutters to the Project along Ross.
3. Kim and Rob Bailey: abutters to the Project along Ross.
4. Dirk and Patty Leasure: abutters to the Project along Booshway.
5. Jerai Moulton: abutter to the Project along Booshway.
6. Nicholas Harbert and Sarah Dunn: abutters to the Project along Booshway & Ross
7. Christina Heilman: abutter to the Project along Booshway.
8. Jay and Susan Pence: Cowboy Trail property owners within 300 feet.
9. Jenny and Brian Van Winkle: Cowboy Trail property owners within 300 feet.
10. Karin and Joe Sadauckas: Cowboy Trail property owners within 300 feet.
11. Meghan Traynor and Craig Smith: Cowboy Trail property owners within 300 feet.
12. Edward Twohey: Booshway property owner.
13. Cheryl Letchworth: Booshway property owner.
14. Jen Maisch Calder: Dusty Trail property owner.

15. Vickie and Neil Van Dresar: Easy Street property owner.

16. Michael Coyle: Easy Street property owner.

17. Linsey and Phillip Edmonds: Cowboy Trail property owners.

These people all reside very near or directly abutting Corona Valley, and have submitted prior letters and testimony in opposition to this project. An individual statement of impact for each person along with their address is included with this application; *it should be considered in combination with all their other prior written and verbal comments submitted into the record regarding their standing and impact.* Collectively, I will refer to these folks as the "Neighbors."

Locally, Booshway Street and Ross Avenue are well-known as over-burdened collector roads. Both roads are poised to receive significant new additional traffic generated by Corona Valley, which is proposed across a vacant field from most of their homes. By City-approved design, Booshway adjacent to the Project lacks sidewalks or buffers, which the prior record indicates was a "design mistake." All of the homes on Booshway are located very close to the narrow 25-ft wide street, set only 20-feet back from the busy road. The traffic and resulting safety risks, noise, and visual distractions of Booshway are a constant presence in the Neighbors' home lives. Likewise, Ross Ave. sees heavy high-speed traffic throughout the day due to its proximity to the schools.

When the Neighbors' children, grandchildren, and pets are playing in their front yards, vigilance is required at all times because these roads are just not safe. Due to this risk, the Neighbors and others sometimes park their cars partially on front lawns as a traffic-calming measure. They have also vigorously testified against the design, high density, traffic assumptions, fiscal impact calculations, lack of defined water availability, and interior road design and configuration, street width, and lack of parking of Corona Valley, and the impacts on Booshway of those oversights. They have specifically advocated for fewer duplex units to reduce density, increase lot size, create more available parking space, and traffic redirection that will lessen the burden on Booshway. In addition, the presence of two soccer fields immediately adjacent to Booshway, and the lack of a green strip along the entirety of Booshway and other mitigations to the impacts from Corona Valley are problematic and have not been addressed. The Booshway Neighbors will also have the enormous Corona Valley construction staging yard

placed directly across the street from them. ***Vis a vis*** **Corona Valley, all of these people are affected parties for purposes of I.C. § 67-6521.**

The Neighbors have timely submitted this Request for Reconsideration of the Corona Valley Preliminary Plat within 14 days of the City's final written decision on the matter, executed September 15, 2026. **We raise the following issues on reconsideration and reserve the right to amend these issues prior to hearing.**

A. Demand for full disclosure of ex parte communications with staff.

A request for reconsideration requires the identification of specific deficiencies in the process. During the September 1, 2026 deliberation, Council Member Johnston stated that Mayor Christensen frequently directed the Council that as a matter of policy, they are to have meetings with staff outside of the open public forum - in advance of the hearing - to sort through any questions or objections or finding of facts they may have regarding the details of Corona Valley and other projects. Johnston stated she had not engaged in these ex parte communications, however, at least Council Member Popilsky stated that he had done so frequently and found it to be useful. *This is a quasi-judicial subdivision application that contains many contested facts,* particularly related to the Traffic Impact Study ("TIS") and fiscal impact analysis. Yet, during deliberation, the Council said almost nothing regarding ***why*** they chose one set of facts over another.

The Council must be prepared to explain their votes. As such, **we ask the Council to (1)** disclose the extent of their discussions with staff outside of the hearing because from the public's perspective, almost no information was communicated as to why the Council ruled the way that it did, and **(2)** specifically explain why one set of facts was more compelling or accurate than the other. A factual justification for the Council's final decision is truly needed here.

B. Technical review of the improvement plans must be completed and approved prior to any finding that the preliminary plat criteria have been met.

The City's final statement of decision states that approval of the preliminary plat included condition No. 1: *"All remaining technical public works comments be addressed and resubmitted in the improvement plans prior to submission to DEQ for review. Public Works to confirm all*

comments are addressed." This directly conflicts with the City's own preliminary plat approval criteria L.D.C. 14.5.6.F.3 which requires that the *"Improvement Plans have been approved by City Public Works, City Engineer, Teton County Fire Protection District, Idaho DEQ and any other agency or department having jurisdiction over the improvements or land thereon."* Here, the revised Improvement Plans were not reviewed and approved prior to a finding that this criteria was met, and the Council's motion specifically "pushes off" this requirement until after the preliminary plat in contravention of the City's Code.

C. The Record is insufficient to sustain a finding of fact or draw conclusions of law that the Criteria 14.5.6.F.5 has been met.

Missing or inadequate Development Agreement components. The City's Code requires that the Council affirmatively conclude that *"the Development Agreement and subdivision design satisfactorily mitigate for the effects from the development"* regarding a wide range of impacts to public services, including roads and construction impacts. Moreover, "*Subdivision and offsite improvements may be required for any of the above, in proportion to the impact made by the development."* On information and belief, Council did not discuss or indicate that they had even reviewed the Development Agreement for Corona Valley. Indeed, if they had, they would have noted that it was missing the following components directly referenced in the document or that such provisions were inadequate:

1. No Condominium Declaration has been submitted or reviewed by Council.

2. No Construction Management Plan has been submitted or reviewed by Council. Considering that several petitioners on this request for reconsideration will be living directly across the street from the staging yard, *this is a serious due process violation. They have been given no opportunity to review and comment* on the large and disruptive construction staging yard proposed to be directly across the street from them, and will likely be there for years. Without review of the Construction Management Plan, **Council has failed to assess and mitigate these impacts**.

3. Development Agreement Section 5 Timeline to Install Improvements: This section of the Development Agreement shows that there really is NO timeline or plan regarding phasing, as the Development Agreement provides in Paragraph 5 that "... Developer

> shall have the discretion to decide in what order such phases of development proceed." Moreover, Exhibit C to the Development Agreement (Phasing Plan) has not been provided. Without this, there is also no way to confirm conformance with LDC 14.5.6.F.4 - "*Any proposed phasing is clearly shown on a development master plan and provides for orderly development of the land conforming at all times to this Land Development Code."* Further, by specifically including all "other circumstances beyond its reasonable control" (such as a lack of financing to complete the work for example) as a "Force Majeure Event" (usually reserved for "Acts of God" such as natural disasters, wars, pandemics, etc.), the language turns the advertised two (2) year time commitment into an open ended vague agreement with NO firm time commitment for the orderly development of the property in violation of the LDC.

Council has granted a multi-phase master plan entitlement where there is only enough water for Phase 1. This is clearly noted in the staff zoning analysis:

> "The original Phase I (approximately 80+ lots) has since been refined and is now reflected as Phases 1 and 2 of the current five-phase master plan. Modeling confirms that Phases 1 and 2 can be fully served by the existing system without off-site improvements. Any development beyond Phase 2 will require the off-site water system upgrades identified in the Keller memorandum (including the recommended transmission improvements) prior to final plat approval of those later phases."[1]

Because of this limitation, Criteria No. 5 cannot be satisfied because LDC 12.1.2 - Phasing requires that *"Each phase must stand alone, meeting all the requirements of this Land Development Code without the need for improvements in later phases."* Please note that Driggs LDC 14.5.6.F. 4, 5 and 6 all use mandatory language, stating a development cannot be approved unless the mitigation and conformity criteria are met. Approving a five-phase development when water only exists for Phase 1 fails to meet this criteria at the outset for Phases 2–5. *Deferred compliance is not compliance!* The City cannot circumvent a mandatory condition precedent for approval by kicking the requirement down the road into a Development Agreement. The code

[1] September 1, 2026 hearing materials packet, Exhibit V - Zoning Analysis p 5.

requires mitigation and infrastructure sufficiency to be demonstrated at the time of approval, not deferred to a future promise.

Water supply is a fundamental "public utility" By approving a project without securing water rights or infrastructure for the remaining 66% (~100 units) of the buildout, the City creates an imminent risk that future demand will either degrade water pressure/quality for current residents or force existing taxpayers to fund future water capacity infrastructure. Moreover, LDC 14.5.6.F. specifically requires the *phasing timelines* to satisfactorily mitigate impacts on service delivery. Approving future phases without a guaranteed, phased water supply schedule directly contradicts this requirement.

Under Idaho's vested rights doctrine land use applications are evaluated under the law in effect at the time of application.[2] Once the City grants conditional approval for a multi-phase development, the developer gains vested rights or strong legal claims toward overall density. Approving a density the City cannot currently supply creates an illegal mismatch between platted density and actual municipal utility capacity. *Ultimately, the City has approved speculative planning, where the City criteria* ***requires*** *finite planning.* A development plan that relies on nonexistent water capacity is inherently speculative and fails to meet sound planning standards embedded in the City's own code.

Further, how does Council responsibly approve a plan which provides only enough water for Phase 1, and then also let the developer "have the discretion to decide in what order such phases of development proceed" (as discussed above re the Development Agreement)? How does the Council know that if the developer chooses to proceed initially with a different phase of development that there will be enough water, both for the phase chosen and for the Neighbors? Council does not have this knowledge.

Lack of deliberation on conflicting facts regarding fiscal impacts. Council received a July 4, 2026 comment letter from Kathleen Haar which included *a 39-page* "Review of Corona Valley Fiscal Impact Analysis ("CV-FIA").[3] This Review explained in detail how the CV-FIA

[2] *S. Fork Coal. v. Bd. of Comm'rs of Bonneville Cnty.,* 117 Idaho 857, 861, 792 P.2d 882, 886 (1990) (citations omitted); see also *Taylor v. Canyon Cnty. Bd. of Comm'rs,* 147 Idaho 424, 436, 210 P.3d 532, 544 (2009).

[3] September 1, 2026 hearing materials packet, Exhibit Z - Public Comment pp. 191-230.

has four primary flaws.

1. The most critical is a fundamental lack of understanding of how taxes are determined in the State of Idaho, resulting in an approximately 10% overstatement of revenues throughout the FIA. Mill levy rates are calculated annually[2] based on budgeted property tax revenues; increases to property tax revenues are strictly controlled by state law.[3] The FIA appears to take the position that the current mill levy rate will be a constant, generating an on-going stream of tax revenue for Driggs. The City's budget cannot increase more than 3% in a year. If growth is factored in, the City's budget cannot increase more than 8% – regardless of the amount of growth. Beyond this, any potential increased revenue due to growth is lost. Based on current state law, growth alone does NOT pay for itself. The FIA refers to the simplicity of the average cost method of analysis, as well as its general acceptance among stakeholders. The discussions that follow demonstrate the short-comings of this simplified approach and why details matter.

2. The CV-FIA significantly under-estimates the cost of schools and law enforcement and the financial contributions of Corona Valley to each of these. It is assumed that similar deficiencies exist for other services.

3. County/law enforcement and school district calculations show evidence of "double-dipping". Looking only at what Corona Valley is estimating for schools, that estimate is at least $100,000 high because of this.

4. Repeatedly setting aside impacts to infrastructure as only "incremental." Adding 576 residents to a community of 2,324 represents an almost-25% increase in population which clearly requires consideration of existing infrastructure and plans to increase its capacity.

The minutes, video recording of Council deliberation and September 15, 2026 “Written Decision” do not discuss or explain how the Council determined these facts in this voluminous report were not accurate or preferable to the applicant’s facts. Again, this ties back to our objection in Part A above: the City Council has not explained the reason for their votes, and why certain contested facts are deemed to be more compelling than others.

Demand for disclosure of the full details of Keller's Travel Demand Model which the City is now using to determine compliance with LDC 14.5.6.F 5 and 6 in lieu of a revised Traffic Impact Study "TIS," as required by Code and by the Planning & Zoning Commission. Despite being an express requirement from the Driggs Planning and Zoning Commission, an update with full review and revision of the Corona Valley TIS has not been conducted. Instead, only a very brief description of a travel demand modeling summary has been provided ("Keller Travel Demand Model"), but the "inputs" and "outputs" of this model have not been disclosed to the public *or to the decision makers*. Indeed, this is a foundational piece of the City's decision-making process, *and it's not even a part of the Record.* As such, the Record is insufficient to conclude that this model is able to sufficiently replace the TIS requirements. More specifically, this model is more of a "black box" where the public and Council do not know what it is, how it works, what assumptions are used, etc.

Further, the impaired credibility of Keller as relates to: **(1)** Keller's only "cursory" review of an obviously flawed Joint TIS (which contains obvious material inconsistencies between text and tables within inches of each other on the same very same pages starting as early as on page 7 of the Executive Summary of the Joint TIS), **(2)** Keller's admission in their Review Letter of the draft Joint TIS that it was "not feasible" for Keller to review a meaningful comparison of data and scenarios throughout the draft report, **(3)** Keller's requirement that changes in the draft Joint TIS that would make the Joint TIS more 'readable' and 'reviewable' (and a comparison thereby 'feasible') *not* apply to the Joint TIS but only to *future* TIS submittals for other projects, and **(4)** Keller not withdrawing their recommendation to the City to "approve" the flawed Joint TIS, despite being shown its serious flaws by the public and criticism of the Joint TIS by Heath & Associates (a Professional Traffic Operations Engineering firm hired by the public to review the Joint TIS), thereby allowing the City to run the risk of continuing to rely on a faulty TIS, underscore the need for full and open disclosure of Keller's Travel Demand Model.

D. Non-conformance with Preliminary Plat Review Criteria 14.5.6.F.6. requiring the application to "substantially conform with underlying zoning and applicable elements of this Title and conform with the Comprehensive Plan and other applicable plans and policies, such as the Transportation Plan and Recreation Master Plan, and established maximum residential densities."

Nonconformance with RS-7 Zone. The description of the RS-7 zone district explicitly states that the district is "primarily intended to accommodate single-family detached homes with a minimum lot size of 7,000 square feet". (LDC 4.2.1) The proposal includes 180 residential lots, of which only 22 (**or 12% of 180**) are single-family lots. The proposed development falls far short of meeting the intention of the RS-7 zone district; hence, it does not substantially conform with the underlying zone district. The City cannot sustain a finding that 14.5.6.F.6 has been satisfied.

Several lots are also below the minimum lot size. Lot 1 in block 4 is below the 7,000 sq ft minimum. Bock 1, lots 5 and 6. do not meet the required minimum lot width of 65 ft. Nearly all of the lots in Blocks 1 and 3 are under 40 feet wide, with an average width of 38.5 feet. LDC 8.18.1, part A-2, states, "Combined parking and driveway area cannot constitute more than 40% of the front or corner yard." However, 21 of the lots in Corona Valley exceed this percentage with a minimum driveway width of 18 ft x 20 ft. This is the minimum area required to park two cars side-by-side. Please note that LDC 11.1.3.A Minimum Parking Requirements mandates 2 stalls per unit for Single Family Homes. The majority of driveways in the surrounding area are either 20 feet x 20 feet or 24 feet x 20 feet. *With lots this narrow, driveways can only be 15.4 feet wide before they violate this 40% standard. In addition, all other lots that are less than 50 feet wide will also violate this standard.*

Nonconformance with 2025 Transportation Master Plan. The 2025 Transportation Master Plan ("TMP") shows Cowboy Trail as a recommended Minor Residential Collector, where the planning team and public works recommended minimizing driveway accesses. Here, the preliminary plat proposes *9 driveways will empty onto this collector road*.

Nonconformance with Comprehensive Plan FLUM. The record likewise does not demonstrate an affirmative finding of conformity with the Driggs Comprehensive Plan. "Idaho precedent confirms that, when a local ordinance expressly makes comprehensive plan compliance an approval criterion, the governing body may decide whether the applicant has satisfied that criterion."[4] Moreover, there is no way to demonstrate conformance with the surrounding neighborhood character. The existing twin homes on Booshway are on 0.32 acre,

[4] September 19, 2026 Memorandum Decision and Order on CV41-24-0269 at p. 10, quoting *Friends of Farm to Mkt. v. Valley Cnty.,* 137 Idaho 192, 200, 46 P.3d 9, 17, (2002).

(0.16 acre per side) with a 20 foot driveway. However, Corona Valley's twin home lots are proposed to be *45% SMALLER than Booshway* (at only 0.20 acres when combined, and 0.1 acre per side) and they will also have sidewalks. Clearly there will be no room for sidewalks, or street parking, or swing sets, or gardens, or anywhere for people to actually live.

E. Violation of Driggs LDC 15.5.6.B.2: Density Bonus and Idaho's Vesting Rule.

The City's zoning analysis notes that the applicant is taking advantage of both old and new zoning requirements to secure a larger density bonus:

> "With the current 180 units proposed, applicant (sic) is proposing 9 units to meet the provisions outlined in 14.5.6.B (2). Without the Density Bonus, the maximum of units allowed on the total 38.8 acres is 155 units. The previous code provisions established a base density of 136 units. *Applicant is using older Density Bonus provisions, as it provides for more units than the recently accepted QWHIP code does*. Under the new provisions, the base density would be RS-7- 4 units per acre, resulting in 155 units as the base density. 180-155 would result in 25 bonus units, requiring 5 deed restricted units."[5] (Emphasis added.)

First off, this application must be reviewed and conform to the standards in place when the application was "vested." A land use applicant's rights are "measured under the law in effect at the time of the application."[6] The Applicant cannot advantageously borrow from both old and new Code. In addition, base density is not an automatic entitlement. It's considered to be the absolute limit of what may be permissible when all other criteria are met.

Secondly, 180 residential units on 38.8 acres exceeds the max density of 4 units per acre. There is no basis in the applicant's vested code that would allow 4.6 units per acre. Moreover, the City has never explained any lawful basis for the Corona Valley developer to seek an incredible **45 "bonus units"** in the first place. Shown below is an excerpt from the Corona

[5] September 1, 2026 hearing materials packet, Exhibit V - Zoning Analysis p 11.
[6] *S. Fork Coal. v. Bd. of Comm'rs of Bonneville Cnty.,* 117 Idaho 857, 861, 792 P.2d 882, 886 (1990) (citations omitted); see also *Taylor v. Canyon Cnty. Bd. of Comm'rs,* 147 Idaho 424, 436, 210 P.3d 532, 544 (2009).

Valley Qualified Workforce Housing Plan:

1. Total number of market rate units and Qualified Workforce Housing units:

Total Units:	180	Bonus Units:	45
Rezone Units:	0	Required QWH Units:	8

Narrative: 3.1 Density Bonus Request: To lawfully achieve the additional 45 units, the applicant is utilizing the density bonus provisions of LDC §14.5.6.B by providing eight (8) deed-restricted workforce/affordable housing units.

Fig 1: Corona Valley Qualified Workforce Housing Plan, p. 1 at Section B.1.[7]

If there is a logical, rational, Code-based basis to explain where these numbers come from, *now is the time for the City to do a better job describing how the applicant can legally use both old and new provisions of the Code to seek 45 extra housing units.*

F. No Phase 1 Plat has been submitted or reviewed by the Council.

This is a required component that was never provided.

G. The City has failed to produce a "reasoned statement" in the final decision per I.C. § 67-6535.

Idaho's Local Land Use Planning Act ("LLUPA") requires that a decision on a land use application be accompanied by a "reasoned statement that explains the criteria and standards considered relevant, states the relevant contested facts relied upon, and explains the rationale for the decision based on the applicable provisions of the comprehensive plan, relevant ordinance and statutory provisions, pertinent constitutional principles and factual information contained in the record." Recent Idaho case law reinforces that this requirement means more than providing broad conclusions and instead that due process requires a Board to provide the reasoning behind a decision, particularly when it was a point of contention in a hearing process.[8] Summarily concluding that an application meets criteria does not meet this burden.

E. Incorporate by reference all of the City's planning documents.

[7] September 1, 2026 hearing materials packet, Exhibit L - Qualified Workforce Housing Plan, p. 1 at Section B.1. This Plan is proposed to be an attachment to the Corona Valley Development Agreement.
[8] *Veterans Park Neighborhood Association, Inc. v. City of Boise*, 175 Idaho 194 (2025).

Because these materials are referenced intermittently throughout the staff analyses, planning board deliberations, and Council deliberations, we hereby request that the following official Driggs City plans and Codes be included in the record of proceeding:

1. The Driggs Land Development Code.
2. Driggs Comprehensive Plan and Appendix.
3. Driggs Future Land Use Map.
4. Driggs Transportation Plan.

For the reasons set forth above, we ask the Driggs City Council to please reconsider its approval of the Corona Valley Preliminary Plat, which, once approved, authorizes the installation of subdivision improvements and infrastructure.

On a personal note, the decisions you are making will be irreversible and directly impact the health and safety of the same people who elected you. Just two weeks ago, my son was hit by a car on the corner of 5th St and Howard Ave. Fortunately, it was a very minor collision, but it did happen. *Then within the same week*, his good friend was quite seriously struck at the intersection of 5th St. and Ross Ave. while biking to school. Your decisions will affect all of us. If you do not have 100% confidence that the impacts of Corona Valley will be entirely mitigated, please reverse your prior decision.

Please also hold a proper hearing on reconsideration where we - *the appellants* - are allowed to present and rebut evidence at hearing.

Very truly yours,

Anna R. Trentadue Esq.
Trentadue Law Office

CC: Mayor August Christensen

ATTACHMENT: Statements from all 28 individuals seeking reconsideration.

CITY OF DRIGGS

Carly Andersen <candersen@driggsidaho.org>

Fwd: Request for reconsideration

1 message

Anna Trentadue <anna@trentaduelawoffice.com> Tue, Sep 29, 2026 at 9:06 PM
To: Jade Krueger <jkrueger@driggsidaho.org>, Carly Andersen <candersen@driggsidaho.org>, mayor@driggsidaho.org, Sam Angell <sla@hasattorneys.com>

One more.

---------- Forwarded message ---------
From: **Aaron Colldeweih** <colldeweih.aaron@gmail.com>
Date: Tue, Sep 29, 2026 at 9:04 PM
Subject: Request for reconsideration
To: <Anna@trentaduelawoffice.com>

Hi Anna,

My name is Aaron Colldeweih, and I live at 780 Buffalo Trail.

The proposed Corona Valley development may impact our family and the surrounding neighborhood by increasing traffic and changing the character and density of the area. We are concerned about how the development could affect the livability and residential nature of our neighborhood. This will make it unsafe for our children to play outside.

I would like to be included in the request for reconsideration.

Thank you,
Aaron and Rachael Colldeweih

Von meinem iPhone gesendet

September 28, 2026

Driggs City Council
& City Planning Jade Krueger
60 South Main Street
Driggs, Idaho 83422

RE: Request for reconsideration of Corona Valley Preliminary Plat approval.

Dear Council Members and Staff:

This firm hereby submits the initial form to request reconsideration of the Corona Valley Preliminary Plat ("Project" or "Corona Valley") on behalf of the following 26 individuals:

1. Jay and Susan Pence: Cowboy Trail property owners within 300 feet.
2. Jenny and Brian Van Winkle: Cowboy Trail property owners within 300 feet.
3. Brett and Elizabeth Bowhan: abutters to the Project along Ross.
4. Dawn and Delaney Smith: abutters to the Project along Ross.
5. Karin and Joe Sadauckas: Cowboy Trail property owners within 300 feet.
6. Dirk and Patty Leasure: abutters to the Project along Booshway.
7. Edward Twohey: Booshway property owner.
8. Cheryl Letchworth: Booshway property owner.
9. Jen Maisch Calder: Dusty Trail property owner.
10. Vickie and Neil Van Dresar: Easy Street property owner.
11. Jeari Moulton: abutter to the Project along Booshway.
12. Nicholas Harbet and Sarah Dunn: abutters to the Project along Booshway & Ross
13. Kim and Rob Bailey: abutters to the Project along Ross.
14. Christina Heilman: abutter to the Project along Booshway.

15. Michael Coyle: Easy Street property owner.

16. Meghan Traynor and Craig Smith: Cowboy Trail property owners within 300 feet

Tomorrow, this office will submit an additional filing containing (1) the letters of authorization from all of these individuals and (2) our narrative forming the basis of our appeal.

Very truly yours,

Anna R. Trentadue Esq.
Trentadue Law Office

CC: Mayor August Christenson

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Christina Heilman <chris.heilman77@gmail.com> Mon, Sep 28, 2026 at 1:32 PM
To: Anna Trentadue <anna@trentaduelawoffice.com>

Dear Anna,

I am joining the request for reconsideration of the Corona Valley Subdivision approval.

Name: Christina Heilman
Address: 545 Booshway St, Driggs, ID

I live directly across the street from the proposed development. My son has biked to school on this pathway for years, and both he and our dog have nearly been hit by cars more times than I'd like to admit. Adding 180 homes to roads that are already unsafe for kids will only make this worse. I have opposed this development in writing to City Council, and I don't believe the traffic study behind the approval was current or transparent enough for anyone to trust the outcome.

Please include me in the request for reconsideration.

Thank you,
Christina Heilman

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration of decision regarding Corona Valley application

1 message

Dirk Leasure <dleasure316@gmail.com> Sun, Sep 27, 2026 at 9:24 PM
To: Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration of Corona Valley.

My name is Dirk Leasure and my address is 685 Booshway Street, Driggs, Idaho, 83422.

Corona Valley will dramatically increase traffic safety risks to my family, friends and neighbors, and me.

The City admitted in early 2026 that the design of Booshway St. was a “mistake” according to Driggs’ Director of Public Works (as Booshway has a width of only twenty-five (25) feet of asphalt, no sidewalk and no buffer between the travel way and the houses’ short front yards and driveways).

Corona Valley dramatically increases traffic, leading to sky rocketing levels of safety risks on Booshway and surrounding streets.

Rather than take the opportunity to adequately address the existing safety concerns on Booshway, **Corona Valley will exacerbate existing safety risks without mitigation of the incremental impacts.**

In addition, siting a construction staging and fueling yard or, in time, two soccer fields, immediately next Booshway will generate incremental traffic and parking problems in an area that already suffers from those problems.

A child on a bike was hit by a car on the way to school last week.

I don’t want to see another child, or any of my family, friends and neighbors, or me, hit and injured or killed on the streets where I reside made more unsafe by dramatically increased traffic with unmitigated impacts from Corona Valley.

I wish to be included in the request for reconsideration.

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration Corona Valley

1 message

Nicholas Harbert <harbert.nick@gmail.com> Mon, Sep 28, 2026 at 12:27 PM
To: Anna@trentaduelawoffice.com

Dear Ms. Trentadue,

My name is Nick Harbert, and I live at 515 Booshway St with my wife, Sarah Dunn and our 4 year old son. I submitted written comments to P&Z and City Council in opposition to Corona Valley, and I am writing to say that I am joining the Request for Reconsideration.

Traffic is already an issue in the neighborhood and a development of this density would add to an already unsafe situation. In addition, the traffic impact studies have been found inadequate. Driggs has taken no actions to address these traffic concerns and at this point we are considering moving to a safer neighborhood.

Please include me as a signer of the Request for Reconsideration. Thank you for your work on this.

Sincerely,
Nick Harbert and Sarah Dunn
515 Booshway St

--
Nick Harbert
303.887.5194
nickharbert.com

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

request for reconsideration

1 message

Dawn Smith <dawnsmithmt@gmail.com> Sun, Sep 27, 2026 at 9:43 PM
To: Anna Trentadue <anna@trentaduelawoffice.com>

Please include Dawn Smith and Delaney Smith in the request for reconsideration for the Corona Valley subdivision. We are concerned about the negative impact that this subdivision will have on public health, safety and welfare. This subdivision will further degrade already dangerous roadways and walkways. The City of Driggs does not have the resources to correctly maintain and manage the area as it exists today. Future development will exacerbate the safety risks for vehicles, pedestrians and limit the ability of emergency vehicles to efficiently access homes or schools in the event of an emergency.

Dawn Smith
Delaney Smith
916 E Ross Ave

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for reconsideration

1 message

Edward Twohey <ed2e1954@gmail.com> Sun, Sep 27, 2026 at 4:05 PM
To: anna@trentaduelawoffice.com

Anna,
My name is Edward Twohey . I live at and own 937 Booshway St., Driggs. I am also a partial owner of 947 Booshway St. I currently rent that I, long term, to a city teacher and her family.
I wish to be included in the Corona Valley request for reconsideration. I am not in favor of the number of housing units that are proposed. With all the subdivisions already going up in Driggs, I just don't think that many more units in such a small area is necessary or smart. Also, the increased truck traffic during construction and the subsequent civilian traffic once completed, is much more than the streets in that area can handle. My final thought is that the density is wrong, the street design is wrong and the capacity for clean water and proper waste treatment is insufficient at this time.
Hopefully, the City Council will come to their senses and reconsider their previous approval and vote to deny the subdivision as it is proposed.
Respectfully,
Edward Twohey

Sent from my iPad@trentaduelaw

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

request for reconsideration

1 message

Vickie & Neil Van Dresar <vdsr42@gmail.com> Mon, Sep 28, 2026 at 11:06 AM
To: anna@trentaduelawoffice.com

Dear Trentadue Law Office,

I live on Easy St. in Driggs, ID, and have serious reservations regarding the planned Corona Valley development near the schools. This large-scale, high-density project will cause substantial traffic congestion in the surrounding areas. Ross Ave. is not a suitable collector street, and traffic will inevitably spill over onto Cowboy Trail, Howard, and Easy Streets—none of which can safely handle the increased volume.

The traffic studies conducted to date are deficient, and a comprehensive, updated study is needed.

Please include me in the request for reconsideration.

Sincerely,

Neil T. Van Dresar
PO Box 1655
876 Easy St
Driggs, ID 83422
vdsr42@gmail.com

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

request for reconsideration

1 message

Karin Sadauckas <ksadauckas@hotmail.com> Sun, Sep 27, 2026 at 12:32 PM
To: "anna@trentaduelawoffice.com" <anna@trentaduelawoffice.com>

Joe Sadauckas and Karin Sadauckas
Permanent residents at :
465 Cowboy Trail
Driggs ID 83422

We are of the opinion that the current development plan would negatively impact our neighborhood by
creating traffic and safety issues due to the density /
type of units. The proximity to the school
Also raises safety concerns. The load placed on the water/sewer systems is also a concern.

We wish to be included in the Corona Valley request for reconsideration .

Karin & Joe Sadauckas

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Philip Edmonds <flippiland@hotmail.com> Mon, Sep 28, 2026 at 8:16 PM
To: "anna@trentaduelawoffice.com" <anna@trentaduelawoffice.com>

My name is Philip Edmonds I live at 415 Cowboy Trail Driggs.
My wife Linsey Edmonds and I wish to be included in the request for reconsideration. The passing of the Corona Valley subdivision will negatively impact our community. We have concerns about the effect this high-density subdivision will have on our infrastructure, specifically water pressure and water availability in the coming years, especially as all planned phases are built out. The increase in traffic through Cowboy Trail is a major safety concern for my family, pets and the many children in our neighborhood. The actual traffic numbers have not been studied in models that represent the expected number of vehicles projected to be living in this development.
We feel the City of Driggs is giving the greenlight to new development at the expense of existing, thriving communities. We respectfully request your reconsideration in the approval of the Corona Valley Subdivision.

Thank you,

Philip and Linsey Edmonds
415 Cowboy Trl
Driggs, ID 83422
208-201-4284

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for reconsideration re Corona Valley subdivision

1 message

Brett Bowhan <bowhan@ida.net> Sat, Sep 26, 2026 at 9:00 PM
To: anna@trentaduelawoffice.com
Cc: bowhan@ida.net, Elizabeth Bowhan <ebowhan@gmail.com>

Anna,

Please include us in the Request for Reconsideration for the Corona Valley subdivision approved by the Driggs City Council during the Septembe 1, 2026 meeting. Have two properties within 300 feet of the development:

1. a home at 705 Buffalo Trail, Driggs, Idaho
2. an undeveloped lot adjacent to and east of the above home, at 750 Ross Ave., Driggs Idaho

Both properties have driveways that ingress and egress on Ross Avenue, and are adjacent to the high school.

We have lived in the home since 2014, followed development of the Comprehensive Plan, and have understood that developments in the area would be compatible with our neighborhood, of a similar density, character, and quality as our subdivision (Calico Sky).

The density and design of the Corona Valley subdivision will severely degrade the quality of life and the character of the neighborhood. It is incompatible with the character and quality of the current housing, devaluing our properties, and setting us up for future large changes in noise, traffic congestion, and resulting safety concerns. Corona Valley is nearly 3 times the neighborhood's existing density - instead of averaging one third acre lots (our lots are both one third acre), with wide streets and adequate parking, 88% of the CV lots are one tenth acre, with narrow streets and no parking. Traffic around the schools is already a mess, but this incompatible density greatly increases risk from cumulative impacts of increased traffic congestion, a concentration of inexperienced drivers, young children darting into traffic, overlapping opening and closing of schools at the same time of day, etc. We have always enjoyed the spacious, quiet area, with nights that allow us to view the stars in a peaceful neighborhood. These amenities will be destroyed.

Thank you for your assistance,

Brett and Elizabeth Bowhan

705 Buffalo Trail, Driggs, Idaho

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Re: This is a message from Anna Trentadue regarding Corona Valley

1 message

Jerai Moulton <jeraimoulton@gmail.com> Mon, Sep 28, 2026 at 11:53 AM
To: Anna Trentadue <anna@trentaduelawoffice.com>

My name is Jerai Moulton and I live at 705 Booshway St, Driggs, ID 83422.

The proposed annexation of Corona Valley into the City of Driggs will have a significant impact on my family and our community. I am concerned about how this decision will affect our neighborhood (safety/road traffic), the character of our community, the school district, and the future of our area. Long term affects need to be taken into consideration before decisions are made.

I would like to be included in the request for reconsideration of Corona Valley's annexation into the city of Driggs. Please include my name and address in the submission.

Thank you,

Jerai Moulton

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Jen Maisch Calder <jenbocalder@gmail.com> Sun, Sep 27, 2026 at 5:18 PM
To: "anna@trentaduelawoffice.com" <anna@trentaduelawoffice.com>

Dear Anna,

I am writing to request to be included in the reconsideration for Corona Valley. My name is Jen Calder and I reside 962 Dusty Trail, Driggs, ID 83422.

As a neighbor to this proposed development, I believe the City of Driggs is not equipped to absorb a high-density project of this nature. The local community will bear the brunt of the cumulative and compounding impacts on our infrastructure and essential services.

Thank you,
Jen Calder

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request to Reconsider proposed Corona Valley sub-division.

1 message

Michael Coyle <mjc@silverstar.com> Mon, Sep 28, 2026 at 2:19 PM
To: Anna@trentaduelawoffice.com

Anna please include me in the Request for Reconsideration for the Corona Valley Subdivision that was approved by the Driggs City Council during their Sept. 1 ,2026 meeting.

My name is Michael Coyle and have lived at my current address ,655 Easy St. Driggs,for more than 30 years and have lived in Driggs, as of this year, for 50 years. I am heart broken to see the City so unprepared to turn back and require integral changes to this proposal starting with the abusive density and the complete lack of effort with trying to blend in with existing neighborhoods.After all the examples of wonderful Ski Towns, Park City,Telluride ,Bozeman/Big Sky, getting over built and over run by developers wanting only to profit and still we not be prepared for this massive attempt by a developer to build within the City with no consideration for the growth impact to the immediate nighborhoods as well to those folks that live blocks away on the other side of town. Those tax paying residents whether they are thinking about it or not are going to see much higher-levels of unsafe traffic on their streets as resident's of this development find and use alternate routes as they are trying to leave for return from Jackson. My street ,Easy St., tho perhaps not as obvious a route will absolutely be used by people trying to snake their way thru be it just going downtown or heading over the Pass. A good friend of mine down in Victor is a prime example of a driver who blew thru the 2 way stop by the north east corner of the Teton Brewery and broadsided my friend seriously injuring Jim and literall coming within inches of hitting car in which Jims 4 year old grandson was sitting in his car seat. That accident was only a split second away from potentially taking 2 lives. That driver, as many do, was using that road to try and by-pass the huge traffic back ups that we are all familar with both in Victor and in Driggs. Just one of many a route that I think is going to be severly impacted would be the route turning East off of Booshway and connecting to The Ski Hill Road on Powder Valley Road after running thru the Powder Valley condos . If I lived in the proposed development I have no doubt that I would use that route often . Then how about on good ski days on Targhee and people using that very small road and trying to get out on the Ski Hill Road. Talk about a bunch of angsted up drivers. As it is I already often use that road and I see it all the time. That intersection is a recipe for disaster and I'm guessing that there are no plans to deal with that traffic by the City at this time.

I think it is imperative that City has in place several proposed solutions to several locations from Drggs thru Victor on Hwy. 33 before they consider any developer requests for dangerouly impactful developments such as Corona Valley. Whatever proposals might help be it road widening, turn lanes , lights and yes absolutely round abouts, they need to be on the books with the State of Idaho and guarenteed construction BEFORE more development. It really does break my heart when I drive thru the existing neighborhoods in the immediate vicinity of the proposed development and think about how great a bunch of houses that "fit" in would be instead of structures that are proposed for one reason and one reason only and thats to make a lot of money for the developer. We cannot "sell our soul to the devil! " We have an opportunity to hit the brakes with this Re-consideration and use the common sense and good judgement that hopefully ,you as our elected officials have. I feel like there are many people who will support, financially, any serious legal attempts by this City if the developer chooses to sue. I am only 1 person and am not wealthy but I would absolutely give a $1000 towards the effort to turn Corona Valleys, ill concieved development back. Our City Council with this Re-consideration has the opportunity be it challenging , to help maintain at some some of the character and integrity that has made this town,this area , such a great place to have lived while working ,raising a Family and retiring and recreating in. I'm sorry but these developers can care less about those values.

They, Corona Valley, do lip service now as they sugar coat their presentatations but if they are ever allowed to move forward, those qualities will quickly become a thing of the past. Driggs thru all these years has been such an awesome place to live with REAL neighborhoods, quiet nights,dark skies and so much more that is the real value of living here like we do. A developer shoud not be allowed to impact and destroy that but instead should be embracing and enhancing so much of what are the true values of living in Driggs.

PLEASE RECONSIDER .

Michael Coyle

655 Easy St. Driggs ID

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Vickie & Neil Van Dresar <vdsr42@gmail.com> Mon, Sep 28, 2026 at 2:32 PM
To: anna@trentaduelawoffice.com

Dear Trentadue Law Office,

My name is Vickie Van Dresar and I live at 876 Easy St, Driggs, ID. I am against the proposed Corona Valley development. Yes, we need good family housing near our schools, but I feel the high-density of the proposed Corona Valley development will be detrimental to this development and to the neighborhoods surrounding it. I do not believe any of the existing streets around this proposed development are suitable as collector streets.The resulting traffic congestion will negatively impact all existing surrounding neighborhoods.

At a minimum a new, comprehensive traffic study done at relevant times (not a week before a school holiday during COVID or by a computer model) should be required and used in the decision making process.

Please include me in the request for reconsideration.

Sincerely,

Vickie J. Van Dresar
PO Box 1655
876 Easy St
Driggs, ID 83422
vdsr42@gmail.com

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

request for reconsideration

1 message

Jenny Van Winkle <jennyleekennedy@gmail.com> Sun, Sep 27, 2026 at 6:15 PM
To: anna@trentaduelawoffice.com

We are not opposed to development, however the density of the Corona Valley Subdivision is too high. In addition to many other problems with the application and process, the traffic associated with this subdivision will make it unsafe for my children to walk and bike to school. The surrounding roads are not built to be collector roads and already, the traffic with the current housing density, is maxxed out at peak times. My two children have just reached the age at which it is appropriate to let them bike to school alone, with friends or around the neighborhood without us. They know and follow the rules of the road. With a subdivision at the currently approved density three doors down from us, that childhood milestone and freedom will vanish. We expect more from the city than this.

There is overwhelming citizen opposition to this subdivision. We wish to be included in the request for reconsideration. Thanks.

Jenny and Brian Van Winkle
445 Cowboy Trail, Driggs, ID 83422

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Meghan Traynor <glexpilot1@gmail.com> Mon, Sep 28, 2026 at 3:24 PM
To: Anna Trentadue <anna@trentaduelawoffice.com>

We are concerned constituents who oppose the current plans for the Corona Valley subdivision. The density of the development does not comply with current zoning laws, which means more vehicular traffic and noise on our small residential street. Cowboy Trail was not designed as a high traffic volume thoroughfare or arterial avenue, and it should not be used as such.

We wish to be included in the request for reconsideration.

Meghan Traynor and Craig Smith
444 Cowboy Trail, Driggs, ID 83422

Sent from my iPhone

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for reconsideration

1 message

Robert Bailey <robertbailey1941@hotmail.com> Mon, Sep 28, 2026 at 12:46 PM
To: "Anna@TrentadueLawOffice.com" <Anna@trentaduelawoffice.com>

Request for consideration
Rob Bailey (Kimberly Hulet Bailey)
480 Cowboy Trail

The Corona Valley development will impact my family, including 21 month old, with increased traffic. This is
A cause of concern for me. And there is a concern for the sound that will increase in the neighborhood.
We would like to be included in the request for consideration.

Rob Bailey

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration of Corona Valley

1 message

Patty Leasure <patriciamleasure@gmail.com> Sun, Sep 27, 2026 at 7:49 PM
To: "anna@trentaduelawoffice.com" <anna@trentaduelawoffice.com>

Request for Reconsideration of Corona Valley.

My name is Patricia M. Leasure and my address is 685 Booshway Street, Driggs, Idaho, 83422.

Corona Valley will negatively impact me and my family in the following ways:

-Unmitigated traffic safety concerns on Booshway Street, Ross Avenue, Cowboy Trail and around the schools; and road designs in Corona Valley that do not address these concerns
-Two soccer fields located along Booshway where the road is too narrow and people using fields will want to park, exacerbating an acknowledged safety issue that has not addressed.
-Density that is not suitable for the school neighborhoods and does not correspond with the primary intention of RS-7 zoning.

I wish to be included in the request for reconsideration.

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

Request for Reconsideration

1 message

Cheryl Letchworth <chletchworth@gmail.com> Sun, Sep 27, 2026 at 4:06 PM
To: anna@trentaduelawoffice.com

Anna,
My name is Cheryl Letchworth. I live at 937 Booshway St, Driggs, ID 83422, and am part owner of 947 Booshway St, Driggs, ID 83422.

I am very concerned that the Corona Valley subdivision, as proposed (and recently approved by Driggs City Council), will add much too much density, traffic and congestion to the surrounding streets, neighborhoods, and schools creating more hazardous roads and safety issues for all. Let's re-think this, and find a way to move forward that still works for the development, as well as the people living in the impacted neighborhoods.

I wish to be included in the request for reconsideration.

Thank you.

Sent from my iPad

TRENTADUE Law Office PLLC

Anna Trentadue <anna@trentaduelawoffice.com>

request for reconsideration

1 message

Kimberly Bailey <kimberlyhulet@gmail.com> Mon, Sep 28, 2026 at 6:11 PM
To: Anna Trentadue <anna@trentaduelawoffice.com>

My name is Kimberly Bailey. I live at 480 Cowboy Trail in Driggs, Idaho. The proposed Corona Valley subdivision will adversely impact my family by dramatically increasing traffic on our street and in our area. Bulb outs and signs will not control drivers who will always take the quickest path available and that path will be going straight across Ross and down Cowboy Trail. I wish to be included in the request for reconsideration.

Thanks to all in advance.

Kimberly Bailey