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Teton County Planning
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Dear Planning Staff and Commission,

We are writing to provide comments on the Northern South Park (NSP) Land Development Regulations (LDRs) and proposed zoning map overlay, as they relate to impacts of proposed development on wildlife and wildlife habitat.

We are encouraged by the planning process's incorporation of wildlife permeability and the protection of the site's sensitive natural resource, the Flat Creek riparian zone. The purpose of this letter is to reinforce our support of these priorities and to provide feedback on proposed location and amount of mandated open space, the preservation of the Flat Creek riparian zone, and fencing requirements.

Location and Prioritization of Open Space

It is important to reiterate that while patterns of usage vary by species, time of year and time of day, animals such as moose, elk, and deer all move through NSP and nearby neighborhoods (e.g. Cottonwood and Rafter J). As livestock fencing is removed and residential landscaping increases potential attractants, wildlife will likely exhibit similar movements in NSP as they currently do in the adjacent neighborhoods, despite the high-density development planned for this site.

We support the vision outlined by the Northern South Park Neighborhood Plan (NSPNP) which prioritizes high-density development clustered along the northern portion of the site, nearest to existing development. We also strongly encourage that open space be 1) connected to other open space and 2) concentrated in the least-densely developed portion of NSP.

We also agree with guidance offered by the Wyoming Game and Fish Department that open space be connected throughout the development. The conceptual zoning maps on pages 65 to 70 of the NSPNP show examples of how approximately 40 acres of passive open space could be concentrated and linked to help funnel wildlife from the Flat Creek corridor to the western and southern edges of the NSP.

To help accommodate concerns about changing elk movements during and after phasing out of nearby feed grounds and cessation of elk hazing at NSP, we recommend connected, passive open spaces be designed to maintain a minimum width of 200 m in bottleneck areas (Wachob and Smith 2003). However, given the relatively small size of the NSP Development, we recognize this may not be practical. In this case, we encourage connected open spaces to be designed to maintain a minimum width of 250 feet in bottleneck areas (and larger outside of bottlenecks) and to incorporate native vegetation when possible.

Open space planning for the long term and on a larger scale is also prudent here. If there is potential for further development of the area south of NSP, open space located at NSP's southern edge could be combined with a future corridor area to equate to the scientifically tested and recommended 200 m.

Protection and Enhancement of the Flat Creek Corridor

We are encouraged by revised, draft LDR language which requires setbacks from Flat Creek to be a minimum of 150 feet. We also view the transition of land use within the Flat Creek corridor (from cattle grazing to residential) as having the potential to benefit habitat quality through willow stake plantings and other restoration techniques. These efforts could be led by Jackson area non-profit organizations.

Rafter J is a good example of efforts to conserve the Flat Creek corridor and could be used as an analogue for NSP development. Rafter J's Flat Creek setbacks are owned and maintained by the Rafter J homeowner association, which has been a good model for conservation.

The riparian zone through Rafter J supports breeding populations of Willow Flycatcher and Calliope Hummingbird (Wyoming Species of Greatest Conservation Need, SGCN) along with a large suite of other riparian-associated species. Otter and beaver have been documented along Flat Creek through the neighborhood, as well as western toad (also a Wyoming SGCN). Famously, grizzly bear 399 and four cubs moved through the neighborhood during fall of 2021. Alongside the robust riparian corridor, during the development of Rafter J, a habitat mitigation area was created which now supports an impressive community of wetland birds. A similar layout in NSP would help improve water quality, mitigate flooding, and retain a north/south corridor for wildlife.

Wildlife-Friendly Fencing

We support the application of wildlife-friendly fencing standards in the current Teton County LDRs to be applied to NSP development. We don't believe that exceptions should be made to the recently amended Wildlife Friendly Fence LDR as this will not only cause confusion but more importantly, it will likely lead to the very issues the county is trying to avoid by having such a regulation, e.g., wildlife injury and death due to fences and a lack of landscape permeability. Landscape permeability is not only about allowing animals to get to needed habitats, but it is also important for allowing them to escape from inappropriate areas they may have wandered into. It is most important to keep passive open space clear of fencing and other infrastructure to enhance permeability and to avoid a situation where wildlife becomes trapped.

Research has shown that wildlife can exist near and even within areas of clustered, high-density development. Given the successful analogues of Melody Ranch and Rafter J, we are optimistic that by maintaining the Flat Creek corridor and wildlife movement zones via parks and open space on the southern end of the site, NSP development can occur in a manner consistent with values outlined in our community's Comprehensive Plan.

Respectfully,

Jackson Hole Wildlife Foundation