

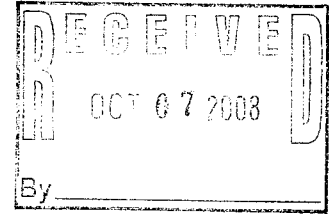


Greater Yellowstone Coalition

P.O. Box 1874 • Bozeman, Montana 59771 • (406) 586-1593
gyc@greateryellowstone.org • www.greateryellowstone.org

October 6, 2008

Teton County Planning and Zoning
89 North Main Street, Suite 4
Driggs, ID 83422



RE: Greater Yellowstone Coalition comments prepared for Mahogany Ridge Subdivision
Public Hearing October 14, 2008

Planning and Zoning Commission Members:

Greater Yellowstone Coalition (GYC) takes this opportunity to comment on the proposed Mahogany Ridge Subdivision. These comments are submitted within the legal timeframe required for consideration at the Planning and Zoning Commission's public hearing scheduled for October 14, 2008. GYC appreciates the opportunity to provide input during this important and necessary process. The decision to permit a project of this size will affect the valley far into the future and should be taken with the utmost caution forethought.

Teton Valley, ID is a critical piece of the Greater Yellowstone Ecosystem. In a 2002 report commissioned by GYC, preeminent conservation biologist Dr. Reed Noss identified Teton Valley as the number one "hotspot" within the Greater Yellowstone Ecosystem based on its vulnerability to current threats (subdivision development) and its "irreplaceability" based on the tremendous habitat and wildlife diversity (Noss et al 2002). This comprehensive ecological assessment considered three primary aspects of biological diversity: 1) rare and sensitive plant and animal species and populations; 2) representation of a full spectrum of vegetative, abiotic, and aquatic habitat features; and 3) support for a select group of large, wide-ranging focal species. Each of these topics touches on the importance of Teton Basin as it relates to the larger Greater Yellowstone Ecosystem.

Outside of the Noss report and others authored by both public and private sectors, it is widely known that Teton Basin provides critical habitat for a wide variety of fish and wildlife species.

- Teton Basin is an important waterbird breeding area, producing thousands of ducks and waterbirds annually.
- The Teton River Watershed supports a highly prized fishery and provides some of the few remaining strongholds for the increasingly rare Yellowstone cutthroat trout.

- Teton Basin has several big game migration corridors recognized by state and federal fish and wildlife agencies, land managers and the conservation community.

The Teton Basin in general, and specifically this exact location, is considered an important area for sandhill cranes. The Mahogany Ridge project site contains half of the Teton Basin's documented crane feeding sites and is adjacent to important roosting areas (Intermountain Aquatics 2008). Due to the regional significance of this habitat to sandhill cranes, extreme care should be taken to safeguard the habitat characteristics that make this area critical for these important birds.

People are drawn to Teton Valley for the many natural amenities the area supports. Wildlife, fisheries and open space are key drivers in the developing economy of the West and, ironically, are the very things we as westerners stand to lose if careful and thoughtful planning does not occur. Teton Valley is often used as a regional example of a community on the brink of losing the natural values it holds dear as development occurs at a rapid and unprecedented pace. Much of the wildlife habitat associated with streams and riparian areas in the valley has or is in the process of being subdivided and developed. A project of the scope and magnitude of the proposed Mahogany Ridge Subdivision should be considered in this context and reviewed based on impacts it will have on Teton Valley and its valued natural amenities and resources.

Upon review of the current proposal for Mahogany Ridge, GYC is concerned with several key aspects to this proposed development. The preliminary plat shows 1,381 building lots scattered across the entire project area. Although the development application claims 2,816 acres of "open space," the reality is that much of that area is broken into small, disconnected pieces and generally does not meet the definition of functional open space. Additionally, the proposed golf courses account for much of the contiguous open space. Due to the highly altered nature of the vegetation and topography, and the intensity of human use, golf courses, as well as roads, side yards, parking lots, etc... should not be considered meaningful open space. If these land uses counted toward meaningful open space, most urban neighborhoods would be able to claim high levels of open space even though there is little if any wildlife value.

In order to remedy this issue, GYC recommends the developer reconfigure the proposed plat in order to create meaningful and functional open space. To accomplish this, the proposed number of units should be significantly decreased and clustered away from streams, riparian areas, wetlands, sandhill crane habitat and other areas of environmental concern. Additionally, the large block of open space should be protected in perpetuity through a conservation easement or some other type of protective measure. Specifically, GYC recommends:

- Expand the Mahogany Creek corridor to include a 500 ft. buffer zone on each side of the stream
- Expand the proposed Crane Reserve to include a more significant block of contiguous habitat

- Remove the lodge and development node planned near the Teton River
- Reduce the number or eliminate the proposed golf courses
- Eliminate the units and golf course proposed along the base of the Big Hole Mountains in order to create a buffer and meaningful, contiguous open space for big game seasonal movement
- Plan and organize open space by identifying priority species' needs, specifically neo-tropical song birds, waterbirds, Yellowstone cutthroat trout, sandhill cranes and big game species

The developer claims in his summary of the project that wildlife is of primary concern for the development team and one of the project goals is to conserve important habitat. Currently, the project does not address this concern or meet the desired goal. Following the recommendations above would allow the developer to create meaningful open space, conserve important habitat and better market these properties to an affluent, conservation-minded consumer. As currently platted, the developer's conservation goals will clearly not be met and a sincere, fact-based pitch to conservation-minded buyers will be difficult at best.

Another concern for the Planning and Zoning Commission and all residents of Teton County, ID should be the fiscal impacts associated with approving a subdivision of this size and magnitude. Short-term financial gains in tax revenue might be real, but so are the long-term service requirements the county would be forced to accept. Population trends show that "urban refugees" (primarily from the coasts and the baby boomer age class) are increasingly choosing full-time residency in the Greater Yellowstone Ecosystem, rather than second home ownership. The implications this has for funding local government are serious and real. Teton County is already struggling to meet basic service needs. The primary way to exacerbate this situation is to approve large subdivisions located far from existing infrastructure and population hubs. As a commission you are well aware that taxpayers end up subsidizing this type of rural development because the cost of services outweigh the increase in generated tax revenue.

Finally, GYC is aware the developer does not own several key parcels of land within the proposed project area. This issue must be remedied before the project is allowed to proceed. Core issues such as this should be dealt with well ahead of the public hearing process. In addition, GYC is aware that the county will not approve the primary access road relocation request made by the developer at a previous public hearing. Given this fact, the developer should be required to reconfigure the proposed plat and restart the development review process.

GYC is heavily involved with regional and local land use planning and wildlife conservation. The organization recently partnered with the Wildlife Conservation Society and Sonoran Institute to produce and publish a handbook on developing land with sensitive wildlife issues. *Building with Wildlife: A guide to conservation-oriented development* lays out the basic ecological principles that support better, more wildlife friendly subdivision design. The publication is the result of several workshops and a

significant amount of research and is meant to provide science-based guidelines for developing with wildlife as a priority.

GYC recognizes that development will occur on private lands in Teton Basin and in the greater ecosystem. Largely it is a question of how, rather than if land will be subdivided. This proposed development clearly does not meet the intent of open space requirements and does little to address specific wildlife needs and impacts. GYC recommends the Planning and Zoning Commission deny the Mahogany Ridge project as currently platted. GYC appreciates the opportunity to provide written comment and is open to working toward a better, more wildlife friendly subdivision design with the developer, county and other local interests.

Sincerely,

Scott Christensen
Private Lands Stewardship Director
Greater Yellowstone Coalition
schristensen@greateryellowstone.org
(406) 586-1593