

October 3, 2016

Teton County Planning & Zoning Commission
150 Courthouse Drive
Driggs, Idaho 83422

Re: Wildlife Comments Regarding the Proposed Land Use Development Code

Dear Planning and Zoning Commissioners:

I am writing to offer broad comments concerning the proposed Land Use Development Code (Code). First off I commend you for taking up this issue and applaud your focus on expediency; however I am very concerned about the timeline and opportunity for meaningful public comment.

My focus at this stage is purely on Wildlife. I was one of the main contributors to wildlife provisions contained in the existing code and know full well the challenges with striking balance between safeguarding wildlife, respecting private property and cost to the developer. Remember that wildlife is the property of all citizens and also a major economic and quality of life driver.

Without going into specifics the following are my major concerns with the plan as drafted:

- The proposed Wildlife Habitat Protection Map is weak and is being used out of context. This map was never produced for this purpose. Although plant community composition and structure are important elements of habitat they are not the only elements. The existing Wildlife Habitat Overlay Map was constructed using the best science and professional judgment available and a much stronger tool. A weakness is that it has not been updated. I recommend keeping the existing map but adding a mechanism for mandatory periodic updates.
- Focus on a 25 acre density trigger to exempt Wildlife Habitat Assessment is ill conceived. Unless the trigger is very high (>100 ac.) Development location and configuration not development density are far more important and scientifically valid predictors of wildlife impacts and protection measures. Even at very low development densities there are some places needing special attention to protect wildlife values.
- Administratively I am concerned about the burdens being placed on Idaho Department of Fish and Game (IDFG). Teton County needs to invest in staff natural resource professionals or certified subcontractors to alleviate some of this burden. IDFG is an extremely valuable partner and should always be given the opportunity to comment but they are also overwhelmed with other responsibilities. I am sensitive to stringing

developers along waiting for comment but also worry about the provision “If comments are not received within 45 days, it will be judged that there are no IDFG comments on the application.

In closing I urge you to slow down and get it right rather than get it done. In my opinion the proposed Code weakens wildlife protections rather than strengthens them, which I don't think is your intent and certainly not the intent of the majority of our residents who favor stronger protections for fish and wildlife.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey Klausmann". The signature is written in a cursive style with a prominent flourish at the end of the name.

Jeffrey Klausmann, *Wildlife Professional*