



IDAHO DEPARTMENT OF FISH AND GAME

UPPER SNAKE REGION

4279 Commerce Circle
Idaho Falls, Idaho 83401

Brad Little / Governor
Jim Fredericks / Director

January 8, 2024

Jade Krueger
Teton County Planning & Zoning
Teton County Courthouse
150 N. Courthouse Drive – Room 107
Driggs, ID 83422

RE: Notice Requesting Public Comments: Proposed Subdivision Cooper's Hollow

The Idaho Department of Fish and Game (IDFG) has reviewed the proposed Cooper's Hollow subdivision. The 131-acre property is outside of Felt adjacent to the Tetonia-Ashton Trail just east of Highway 32. The purpose of these comments is to assist Teton County by providing technical information addressing potential effects on wildlife and wildlife habitat, and how any adverse effects might be mitigated. Resident species of fish and wildlife are property of all Idaho citizens, and IDFG and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate, and manage all fish and wildlife in Idaho (Idaho Code § 36-103(a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and suggestions. A wide variety of wildlife is likely to occur on the property. To reduce potential adverse effects to wildlife, IDFG recommends considering the following:

- Mule Deer migrate between high elevation summer ranges (Grand Teton & Yellowstone National Parks) to lower elevation winter range along the Teton canyon (See Teton River Mule Deer: Ungulate Migrations of the Western United States, Vol. 1 <https://doi.org/10.3133/sir20205101>). Land uses (urbanization and agriculture), infrastructure (e.g., roads, and fences), and large-scale habitat changes can degrade big game habitat and disrupt migrations (Idaho Action Plan (V5.0) 2023). Further, increased residential development within mule deer habitat has been correlated with declining recruitment rates, particularly within seasonal winter ranges (Johnson et al. 2017). This suggests that increases in residential development are not compatible with maintaining productive mule deer populations.
- The area supports both resident and migratory elk populations (See Teton River Elk: Ungulate Migrations of the Western United States, Vol. 3 <https://doi.org/10.3133/sir20225088>). Migration is a crucial seasonal strategy to acquire necessary resources, and maintaining these migrations is imperative for long term persistence of this elk population. Elk winter range is a limiting factor across this landscape. In addition to direct loss of habitat, increased development has led to increased conflict and reduced tolerance for elk. Additionally, increases in 'hobby ranches' associated with development have come with more fences, horse feed, etc. and have resulted in

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increased conflict and comingling with horses. The same individuals that are moving to and building in Teton County because of the wildlife values, are becoming common reporters of complaints associated with those wildlife after development.

- Columbian sharp-tailed grouse (CSTG) are classified as a Species of Greatest Conservation Need (SGCN) and given a vulnerable designation in the new Idaho State Wildlife Action Plan (*Draft IDFG 2023*). Greater than 60% of remaining CSTG in the U.S. are found in Idaho. Threats to CSTG include loss of habitat due to agricultural and human development, habitat modification, shrub control, and human disturbance (IDFG 2015). In 2016 the closest active lek was 2.8 km from the proposed development, though IDFG has not conducted lek surveys on the property.
- Large carnivore/human interactions are becoming more frequent in Teton County. IDFG staff has responded to black and grizzly bears, mountain lions, and gray wolves following conflicts with people and/or property. Unsecured garbage, hobby agriculture, pet and livestock food, and the proximity to prey species all can attract predators. IDFG recommends enforcing Teton County Code Title 4 Chapter 7 to minimize the potential for attracting bears into residential areas and to educate all local and short-term residents on conflict mitigation practices. As with elk, as mentioned above, more development in Teton County leads to more conflict with carnivores.
- Feeding attracts and concentrates animals away from their native habitat, habituate animals to people, facilitates the spread of disease, and creates conflicts between neighboring homeowners. Big game animals should not be fed under any circumstances unless specifically conducted by or in cooperation with IDFG.
- Fencing may be required to control domestic animals, protect landscaping, and define property boundaries; however, fences present a hazard to wildlife as some designs allow entanglement or entrapment. No fencing is preferred, but if fences are necessary, they should be a wildlife-friendly design, such as a post and rail design with a top rail height of 42” and a bottom rail height of 18”. Wildlife-friendly designs will facilitate wildlife passage through an area and reduce the potential for wildlife to become entrained within fenced areas. Please consult with IDFG when considering a wildlife-friendly fence project.
- Landscaping plants may be damaged by wildlife, including depredation by big game. Damage to vegetation and any efforts to control deer, moose, and elk depredation is the responsibility of the landowner and must comply with IDFG rules and regulations. Many browse-resistant ornamental plants are widely available and should be planted in place of highly edible landscaping plants. Additionally, IDFG recommends prohibiting planting yews, which include shrubs or small trees used as landscaping ornamentals. Yews are toxic to elk, deer, and other animals, including humans.

Thank you for the opportunity to provide comments. For further technical questions or help, please contact Tim C. Swearingen in the Upper Snake Region office at (208) 525-7290 or tim.swearingen@idfg.idaho.gov.

Sincerely,



Matt Pieron
Regional Supervisor

Literature Cited

Idaho Department of Fish and Game. 2015. Management plan for the conservation of Columbian sharp-tailed grouse in Idaho 2015-2025. Idaho Department of Fish and Game, Boise, USA.

Idaho Department of Fish and Game. 2023. Idaho Action Plan (V5.0) – Improving Big Game Winter Range and Migration Routes, Boise, USA.

Idaho Department of Fish and Game (IDFG). In Preparation. *DRAFT* Idaho state wildlife action plan. 2023 rev. ed. Boise (ID): Idaho Department of Fish and Game. <https://idfg.idaho.gov/>.

Johnson, H. E., J. R. Sushinsky, A. Holland, E. J. Bergman, T. Balzer, J. Garner, and S.E. Reed. 2017. Increases in residential and energy development are associated with reductions in recruitment for a large ungulate. *Global Change Biology* **23**: 578–591.