

Monday, February 24, 2025



Re: MSC2024-0037 Northern South Park Area I Master Site Plan Application

Dear Planning Commissioners and Ms. Windom,

Protect Our Water Jackson Hole (POWJH) is a nonprofit organization dedicated to serving as a powerful advocate and catalyst to protect and restore Teton County's water resources. Accordingly, we are pleased to offer comments on the aforementioned project, which provides an opportunity to improve water quality in the Flat Creek and Snake River watersheds.

Flat Creek, a Class 2AB waterbody in Wyoming, is an important waterway already suffering from detrimental human impacts. Designated uses for Flat Creek's water include drinking water, game and non-game fish, fish consumption, aquatic life other than fish, recreation, agriculture, wildlife, industry, and scenic value. Flat Creek is also listed on Wyoming's 2022/2024 Integrated 305(b) and 303(d) Report. The sections between Cache Creek and High School Rd. and High School Rd. to the confluence with the Snake River have not supported designated uses for Aquatic Life Other Than Fish and Cold Water Game Fish due to Physical Substrate Habitat Alterations since 2008. The section between High School Rd. and the confluence with the Snake River also has not supported Recreation due to excess *E. coli* bacteria since 2020. In 2023, POWJH spearheaded the initiation of water quality monitoring for bacteria on the creek to help guide continued restoration efforts. Since 2020, we have been involved with the creation and (now) implementation of the Teton County Water Quality Management Plan (WQMP), which serves as a guiding document for the restoration and protection of our community's water resources.

Thankfully, the aforementioned Master Site Plan application for Area I of the Northern South Park residential development project offers an opportunity to improve water quality, principally through better management of stormwater and wastewater. As such, we would like to offer the following comments for your consideration:

- The project area contains porous soil and a high water table. It falls within the WQMP's Surface Water Protection Zone 1, Surface Water Protection Zone 2, and Aquifer Protection Zone 2. Accordingly, every possible effort must be made to alleviate the potential for fertilizers, pet waste, and other contaminants to be transported into surface and groundwater via stormwater pollution controls. We have two related comments. **We request that the applicant create and share a plan to minimize fertilizer use on residential lawns and open spaces within the development. We also urge the Planning Commission to require a clear description of the applicant's plan to manage stormwater.**
- The WQMP identifies Northern South Park as an immediate priority to connect to the Town of Jackson's Wastewater Treatment Facility (WWTF). The WQMP also identifies several downstream communities as priority areas to connect to the Town's WWTF

(North Meadow- Immediate Priority and South Park Ranches- Short-Term Priority). As other comments have already explained, this project presents the opportunity to send sewage downstream in a southerly direction, rather than upstream to the High School Road line, which could help lay the foundation for future connections from these adjacent areas. **We implore the Planning Commission to require an agreement between the Town and applicant for the connection of this project area to the Town WWTF that promotes the completion of other related water quality improvement projects prior to the approval of the Master Site Plan.**

POWJH is grateful for the opportunity to provide comments. The realization of the Northern South Park residential development project has the potential to improve our community's water quality; for the sake of our environment and our public health. It is important that we get this project right, as its impacts will shape the future of our community for generations to come.

Thank you for your time, consideration, and hard work.

Sincerely,

A handwritten signature in black ink, appearing to read 'MB' with a stylized flourish.

Matthew Bambach
Water Resources Program Manager
Protect Our Water Jackson Hole