



Grand Teton National Park Public-Private Housing Initiative CIVIC ENGAGEMENT SUMMARY REPORT



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Executive Summary

The National Park Service (NPS) and the Grand Teton National Park Foundation (GTNPF) are exploring options for additional housing for Grand Teton National Park (GTNP, the park) staff. The housing is needed because current park-provided housing stock is insufficient to meet current and future employee housing needs, and prices in the area are cost-prohibitive for park employees. The park has historically strived to provide affordable housing in order to recruit and retain quality staff.

The park, with support from GTNPF, is considering constructing additional housing for park employees within the Town of Kelly, a small, unincorporated community north of Jackson, Wyoming, and within the eastern boundary of GTNP. These housing concepts were presented to the public in both small meetings and an open house. The park and GTNPF solicited feedback from the public on the Public-Private Housing Initiative. The civic engagement period began on March 13, 2026, and ended on March 30, 2026. A public open house was held on March 16, 2026.

This Civic Engagement Comment Summary Report provides a consolidation of the feedback provided during this public comment period. A total of 204 correspondences were received. This report broadly categorizes those comments into 20 categories or resource areas and 38 concern statements to reflect the issues and concerns of the public. They will be used to inform the development of planning alternatives for the Public-Private Housing Initiative in GTNP.

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I. Introduction

The National Park Service (NPS), with planning support from the Grand Teton National Park Foundation (GTNPF), is exploring options to provide needed housing for Grand Teton National Park (GTNP, the park) staff. GTNP depends on year-round staff to protect natural and cultural resources, ensure visitor safety, and maintain operations. In Teton County's constrained housing market, the availability of stable and affordable housing directly impacts the park's ability to hire and retain employees. Housing prices in the area are cost-prohibitive for park employees, current park-provided housing supply is inadequate, and the Park consistently works to provide affordable housing in order to recruit and retain quality staff. About 95% of GTNP's workforce relies on park-provided housing. The park continues its long-range effort to strengthen housing stability for year-round employees. As part of that broader planning process of evaluating multiple housing locations within the southern portion of the park, GTNP is considering whether a small, community-scaled housing concept on park-owned land in the Town of Kelly may be an option. To better assess this option, the park undertook civic engagement, a continuous and dynamic conversation with the public to encourage a dialogue between the park and interested stakeholders, outside of a formal process.

2. Civic Engagement

The park conducted civic engagement to share project information with the public and to obtain public feedback about the potential park housing initiative in the town of Kelly. The primary purpose of civic engagement was to gather public perspectives about the development of housing on park-owned land in Kelly. This evaluation is one component of an ongoing review of housing needs and exploration of potential options in the southern portion of the park. Activities that occurred are described below.

A number of informal meetings were held to discuss the proposal. Between November 6 and 7, 2025, NPS staff met at the proposed housing site in Kelly with Phil Powers, Executive Director of Protect our Waters; Jenny Fitzgerald, Executive Director of the Jackson Hole Conservation Alliance; Len Carlman, Teton County Commissioner, and Mark Newcomb, Chair of the Teton County Commission. They met with Kelly resident and national bestselling author Ted Kerasote on November 13, 2025. Additionally, a group of community members met with members of the park staff at the site under consideration on Friday, November 21, 2025.

A Community Open House was held March 16, 2026, from 5-7 PM at the Kelly School, located at 6725 4th Street in Kelly. The open house included informational displays and park staff on hand for one-on-one conversations. Attendees were provided an opportunity to submit written comments directly to the NPS Planning, Environment, and Public Comment (PEPC) webpage during the meeting. The open house provided background on the need for workforce housing, what it may look like in the Town of Kelly, and information about what park housing in Kelly may mean for current residents. Community members were encouraged to attend, ask questions, and share perspectives in writing via PEPC. Civic engagement materials used during the open house are provided in Appendix A.

As part of the park's outreach activities, the park provided information on the NPS Planning,

Environment, and Public Comment (PEPC) webpage with an overview of the project and local considerations such as water resources, quality of life, etc., key questions related to the project for the public to consider, a link for the public to comment, and notice that the park was seeking public input from March 13, 2026 to March 30, 2026.

During the comment period, the park requested feedback about the idea of NPS employee housing on NPS land in Kelly based on primary issues that came out through informal conversations with the community prior to announcing the civic engagement opportunity. Specifically, the NPS was looking for information on the following topic questions:

1. What perspectives do you have about the park potentially building workforce housing in Kelly?
2. What aspects of Kelly's community character are most important to you and why?
3. What local knowledge should inform the evaluation of environmental protection, infrastructure, public safety, and community development?
4. What information would help you better understand water-related considerations as it pertains to workforce housing in Kelly?
5. How would workforce housing in Kelly affect you?

As part of ongoing pre-NEPA and civic engagement, the park intends to continue informal conversations with residents and stakeholders; review technical considerations related to water, wildlife, infrastructure, and other concerns; and synthesize comments and concerns raised by the community.

3. Comment Analysis Process

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers. Comment analysis is used to assist the planning team in organizing, clarifying, and addressing technical information pursuant to NEPA regulations, or outside of NEPA as part of a continuum of information sharing between the public and the National Park Service. It also aids in identifying the topics and issues to be evaluated and considered in the planning and NEPA process.

To help track and respond to community feedback in a consistent and transparent way, the park used the NPS's public comment site (PEPC) to solicit comments. While PEPC is also used for formal environmental reviews, this project is not currently in a formal NEPA process. The system is being used at this stage for public notification and to collect and organize input during this initial feasibility assessment phase.

Primary terms used in the document are defined below to facilitate an understanding of the process:

Correspondence: The entire document received from a commenter. It can be in the form of a letter, e-mail, written comment form, etc. and can consist of one or more comment.

Comment: A portion of the text within a piece of correspondence that addresses a single subject. It could include such information as an expression of support or opposition to a proposal, additional data regarding the existing condition, alternative ideas for addressing a problem, or a question about the project.

Code: A grouping centered on a common subject, such as visitor experience or visual resources.

Concern: Subdivision of a code. Codes were separated into concern statements to provide a better focus on the content of comments.

Correspondences received during the civic engagement period were reviewed and analyzed in a series of steps. Each correspondence received was first read to determine the discrete points expressed by the author, each of which was considered as a “comment.” Comments identified from the various correspondences that shared a common theme or sentiment were grouped: each discrete comment was “coded” or sorted into logical groups by topics and issues in order to associate that comment with a particular resource topic (e.g., wildlife or water resources). Once all letters were coded for individual comments, similar comments were grouped together and a “concern statement” was generated to capture the main points expressed by the comments.

All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential option over another; and comments of a personal or philosophical nature. The analysis process aimed to identify viewpoints communicated, issues raised, and suggestions provided by the public, based on the correspondence received. Although the process attempted to capture the full range of public concerns, caution should be taken when using this report. Firstly, comments from people who chose to respond do not necessarily represent the sentiments of the entire, or even the majority of, the public. Secondly, emphasis should be placed on the content of the comment rather than the number of times a comment was received. The breadth of comments/topics is captured in this report, not the exact numbers of each comment or concern.

All comments received during the civic engagement process – including any correspondence received via PEPC, emails sent to park staff, and written comments mailed to park headquarters – were evaluated and considered in this summary report and are now part of the Administrative Record for this project.

4. Summary of Correspondence Received

A total of 204 pieces of correspondence were received during the civic engagement process. Of this total number, 197 correspondences were received through PEPC, six were emails, and one was a letter. The comments were categorized into 20 codes that were further subdivided into 38 concern statements.

The purpose of the Civic Engagement Summary Report is to summarize the comments received within the open public comment period. The majority of comments were related to concerns about altering the character of the Town of Kelly, other locations that should be considered, water resources, and wildlife. The planning team is reviewing the concern statements and will use this information to assist with future planning for the Public-Private Housing Initiative within the park.

5. Content Analysis

During the civic engagement, the park received 204 pieces of correspondence (all

correspondence is included in Appendix B). These responses were carefully reviewed, and individual comments were identified and sorted according to the subject matter addressed (code). The following list contains the general codes that were identified in the comments and used for the analysis. A total of 20 codes were derived from the correspondences. Similar comments were then grouped into concern statements within each code. The number of concern statements for each code is shown in parentheses. The list is organized alphabetically, and not by matter of importance or number of comments received.

- Carbon Footprint (1)
- Character of Kelly (3)
- Fire (1)
- Invasive Species (1)
- Light (1)
- Mandate/Mission (1)
- NEPA/Process (3)
- Noise (1)
- Other Locations/Options (7)
- Power/Energy (1)
- Preservation/Purpose of Land (1)
- Safety (1)
- School (1)
- Socioeconomics (1)
- Traffic (1)
- View/Scenic/Visuals (2)
- Visitors/Visitor Experience (1)
- Water Resources (6)
- Wildlife/Wildlife Habitat (3)
- Zoning (1)

6. Civic Engagement Comment Summary

After the public comments were coded, they were grouped into 38 concern statements. Within the comment summary that follows, major concepts and unique perspectives are represented for the comments received during the comment period. Subcategories within codes were created to further define the categories created for the civic engagement public comments. Several other topics and concerns were discussed in comments and those that were discussed multiple times were highlighted in this report and in following paragraphs. Commentors specifically and indirectly addressed the questions posed in the civic engagement resources online. Additionally, several comments that were out of scope for the project were received but were still coded and provided to the NPS team. These comments will be considered in longer-term planning efforts for the area.

Carbon Footprint

Commenters express concern about the proposal's carbon footprint:

- There is also the issue of the park's carbon footprint. Placing staff housing in Moose, rather than Kelly, will reduce it. Staff can walk to work, and instead of many cars driving from Kelly to Moose, a single bus can bring Moose's children to the Kelly school.
- The increased traffic and increased distance to Jackson will increase the carbon footprint. Please do not misrepresent this fact.
- The employees would spend much less on fuel walking to work in Moose, rather than driving the 13 miles from Kelly.

Character of Kelly

Commenters state housing should be compatible with character of Kelly or express concern about the town's character:

- Look of housing should be designed to fit with Kelly/Wyoming housing. Build housing that looks like it belongs there.
- Architectural character of buildings should match Kelly.
- "Architecture should be integrated with nature and daily life, existing quietly rather than opposing it." Yes, not all the houses in Kelly do this, BUT WE HOLD THE NATIONAL PARK TO A HIGHER STANDARD. AND IN THE FUTURE THEY MUST DO BETTER.
- Consistent with existing neighborhood character.
- Want it to be consistent with Historic and rustic character of Kelly.
- Don't want 12 modular.
- Don't want cookie cutter units/suburban cookie cutter subdivision.
- Don't want an HOA culture.
- Singles, couples, and families would fit into Kelly best.
- The proposal seemed rushed and oddly familiar to developments I've seen throughout Utah - urban sprawl, subdivisions with little thought given to aesthetics, longevity, or sustainability, built quickly with convenience as the primary goal. Has careful thought gone into this plan? Kelly is unique. There is character here, diversity, and a strong sense of place.
- Concerned about the planned density (generally .17 acres per home). Also important is the predominant use of logs in much of the housing construction.
- Concerned about density of new construction.
- I do not support sprawl, and that is what the NPS Kelly housing proposal would be, and in one of the world's most iconic national parks.
- Concerned about urban sprawl, by constructing a new housing tract on previously wild land outside of Kelly.
- The population of Kelly consists of long-term residents who identify as a community with

common interests that would conflict with park employees who are required to support park initiatives.

- Kelly is a unique and eclectic neighborhood with a physical plant and social culture that predates the park. It does not seem appropriate to take over Kelly with an out-of-character mobile home development adjacent to the existing community.
- If you must add housing in Kelly, please have the design align with the existing physical and social characteristics. Treat Kelly like Mormon Row as it has the same historical significance.
- The aesthetics and individuality are part of the culture and history and charm of Kelly. This development would drastically change the building aesthetics and the culture of the community.
- Building park workforce housing within Kelly and integrating employees into the village on existing park plots will protect the quality of life in Kelly for existing and new residents.
- Log, stone, steel, NP brown lath, siding, will maintain the character and seamlessly blend. Using locally sourced materials, workforce, and installation will benefit the community now and into the future.
- When trying to gauge the merits of all these sites, it's worth considering the scale of the new development on different park communities. If new staff homes are erected in Moose and Beaver Creek, the cars owned by these residents won't change the culture of these locales at all, since about 450,000 cars go through the Moose entrance of the park per year, according to the public records that I've seen. By contrast, twelve or more cars going in and out of Kelly and accessing a virtually unused dirt road—along with UPS, FedEx, maintenance and repair vehicles—will dramatically change the complexion and culture of the village, not to mention affecting the nearby wildlife. Likewise, if the development is placed between the Warm Springs and Nichol Springs Roads—twelve more cars entering and exiting busy Route 89 aren't going to change the feel of that major highway.

Commenters state quality of life/community character is important or would change and/or housing wouldn't fit:

- Quality of life will be affected/decreased by increased population, traffic,
- Kelly will be dramatically changed if this housing is built, transforming our part of Kelly from a rather quiet, out-of-the-way hamlet to a much busier place with far more traffic, impacted views, and no more walking through land where we've walked and skied for decades. Our enjoyment of the wildlife that inhabits that terrain will be ended and so will the public's.
- Small community values.
- Value small community, public lands, and open space.
- Has charm.
- Kelly is a historic area.
- Currently safe and quiet.

- Construction in Kelly would affect tranquility of the community.
- Kelly is valued for solitude/quiet.
- Likes the rural / undeveloped feel.
- Kelly is small rustic unique, pristine, and rare, primitive.
- Like current small neighborhood feeling and peace and quiet.
- New housing will affect character of town.
- The design and density does not allow the new residents the opportunity to coexist.
- Proposed development is antithetical to Kelly's character.
- Kelly has a lot of older residents. Rental residents may bring younger residents and families.
- Full-time families or transient seasonal workers? /support families but not transient/seasonal workers.
- This proposal shows a disregard for both the people of Kelly and the wildlife that depend on this landscape for habitat and migration. We did not choose to live here to be part of a developed workforce housing area. If this proposal moves forward, it will fundamentally change the nature of this town and damage the relationship between residents and the park. Kelly is not designed for this level of expansion, and the proposal feels deeply disrespectful to the community, the wildlife, and the environment as a whole.
- Transient population won't fit with small community of committed landowners.
- We have had an understanding with the private land owners who live on the South side of the Gros Ventre River. Their road is private, but they allow us to walk there. With a new subdivision, they may feel the crunch and restrict that access.
- Don't want unregulated development/growth.
- What isn't being taken into account is the impact of creating a separate enclave on the edge of Kelly's human culture. If built, these twelve houses will create a "parky" community that is separate from the Kelly community. In addition, there is a strong possibility that park staff will be temporary employees and move on to other jobs after a number of years, not putting down roots in our community. If any park housing is to be built in Kelly, it should be placed on park land in central Kelly, where park employees can integrate with the community (as has happened with the current park staff housed there), and where the structures won't impact frequently used wildlife habitat.
- The transient employees probably wouldn't share the pride of place nor share a like-mindedness with anyone other than park staff.
- Increased housing will introduce more noise, light pollution, and year-round activity into an area currently defined by quiet and low density. The character of Kelly is built on open space, privacy, and a close connection to the surrounding landscape. Changes of this size directly impact that character and the reasons people choose to live here.
- The structure of the NPS is such that it is generally transients in nature due to the advancement structure. Many park employees tend to move from park to park, rather

than having their entire career in one park. Kelly is not a transient community. Proposing a development of this size and wanting to integrate into community, but building outside the lots on the outside of the platted area doesn't lend itself to integration and a sense of community.

- Unfortunately, because of living cost, the temporary Federal employees working here, cannot develop any sense of roots or permanence here. When the park's transient people are here for only short periods, they think about park problems differently than people whose entire lives are spent here. The current park problem is the need for more employee housing. Last November, the park presented their thinking to Kelly's permanent residents. It was sad. Their proposal quickly showed us the park's transient thinking. They presented a quick and easy solution by simply putting twelve factory pre-fab, two-bedroom houses with attached garages all squeezed together on about one acre in a corner of Kelly. Twelve quick, cheap pre-fabs with at least 24 adults and 24 cars slammed into a corner of Kelly. Did this quick solution idea consider any of the long term problems like water and waste water and trash and parking. There are many alternatives to solving our park's problem – but when the park presents their first solution - pre-fabs jammed together - it is profoundly sad to think that is the depth of their thinking.
- This town is not meant for a development of this scale. The proposal feels completely out of place. We would lose our peace and quiet.

Commenters state the housing is a good idea and/or will benefit Kelly:

- Park staff will be good stewards and neighbors and will be a benefit to Kelly.
- I appreciate that the park has planned to put the housing in east Kelly where it will have the least amount of impact to the community.
- Currently there are three park families in Kelly. Each one is beautiful. Each of the families have been here for about 10 years or longer and their homes show pride and make our community proud to have these families here with us.
- Support plan.
- Important to provide housing for NPS and nonprofit partners. Housing is needed.
- Already in a disturbed area
- It is very much needed. I support well thought out and APPROPRIATE locations and styles of housing.
- New people will have better quality of life than in other housing locations.
- More long-term residents here with stable housing would contribute positively to the community.
- Providing housing with a shorter commute time and travel distance than living in Jackson is important.
- Having park employees live in Kelly has been a benefit in the past.
- Support plan because park needs resources (housing) to keep employees.

- I completely understand the mixed feelings of Kelly residents towards new development there. I too would be much happier if, somehow, we could reduce development in and around the park rather than add to it. But as a former program manager in Grand Teton, I know that staffing capacity is directly related to the park's ability to protect this incredible place. And with park housing in Teton County, there are no easy paths to take.
- Infusion of young families might be good for Kelly.
- Park employees would appreciate Kelly's qualities.
- Proposal has the potential for positive social outcomes in Kelly.
- Great idea because the parcel is already disturbed.

Fire

Commenters express concerns about the fire infrastructure in Kelly:

- Sprinkler systems?
- Kelly is within WUI.
- Fire protection is 14 miles away.
- County fire codes must be adhered to (defensible spaces, internal sprinklers, etc.).
- No fire hydrants in the area.
- Want to know more about fire fighting plans for Kelly. There was a home in central Kelly that burned to the ground, and the Mormon Row and Pfeiffer fires threatened Kelly. A 1950's report noted that the force of water at the Kelly School was inadequate for fire fighting hoses.
- We also are aware of the great distance local fire services are from us.
- What about fire mitigation? Are you installing fire hydrants? I know how long it takes for an ambulance to arrive from town. Same for fire trucks. We don't have a North of Town Fire House (yet). If this project goes thru, who's behind it with the GTNP? Any investors? Full disclosure would be a good idea! How about a little quid pro quo - bury the electrical lines in Kelly and have working fire hydrants.

Invasive Species

Commenters express concern about the spread of invasive species from the proposal:

- Already present and should be treated. Concerned about additional spread.

Light

Commenters express concern about increased light from the proposal:

- Light pollution will affect whole community.
- Concerned about additional light.

Mandate/Mission

Commenters state the proposal is against the NPS mandate or mission:

- The NPS has a mission to "preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations." The Kelly proposal is antithetical to the NPS's mission, mandate, and ethic.
- Fragmenting this habitat with new residential development and infrastructure directly conflicts with the park's conservation mission.
- The proposal violates the NPS requirement to preserve wildlife habitat which that land near Kelly provides. The infrastructure needed to support park housing would disrupt the area even more than just building houses.
- Leave resources unimpaired for enjoyment of future generations.
- Park has mandate to preserve habitat/protect wildlife.
- The prime reason we have national parks is to provide habitat for wild animals, insect, and birds. Building workforce housing in a natural area, when a developed area is available is morally wrong and against the primary goal of CONSERVATION.

NEPA/Process

Commenters make statements about NEPA or the NEPA process, including comments about public engagement:

- An independent EIS should be done with the NPS sharing the results
- Please include other viable options for communications and feedback other than a QR Code. Responding with a full sized keyboard and larger screen are easier than trying to type into a phone. A website link for this request for feedback and comments would be great. When is the next community GTNP Meeting on this topic? Please give at least a week's notice.
- Thank you for listening, and I urge you to create a website and a mailing list that keeps interested members of the community informed of your decisions as well as the opportunity to comment on them and the draft EIS that the park will release for any location that is slated for development.
- What is the need?/Need should be better explained.
- Why is it necessary to build in Kelly.

Commenters state the park should be concerned most with local feelings or knowledge and/or locals should be included in process:

- Please truly listen to all Kelly residents and sincerely incorporate their input. We don't want to be part of just another performative process where the NPS needs to check a box only because it is what's required.
- Concerned that decision has already been made (it's a done deal). People in Kelly should have the decision.

Commenters express concern about a precedent for future development:

- Concerned about future expansion/building as well. Will it set a precedent for additional development.
- Sets the stage for additional /expanded housing. And urban sprawl.

Noise

Commenters express concern about increased noise from the proposal:

- Increased noise will affect whole community.
- Concerned about additional noise.

Other Locations/Options

Commenters make statements about Moose as the preferred location for housing to be built or state why it would be a better location.

- Moose would be better location.
- Already has structure and sites available (10?).
- Has all the facilities required for proposed housing.
- Currently has in-place infrastructure.
- Moose for water, utilities, power and sewage will easily support ten new houses for park employees, for which land is already available.
- There are ten existing building sites at highly developed park headquarters in Moose, where power, water, and sewage treatment are already in place--none of which exists at the proposed Kelly site.
- Already has modular housing.
- Less intrusive in Moose.
- Is near grocery store, visitor's center, restaurant, gas.
- Could add fourplexes to meet the need.
- Building in Moose would not affect habitat, migration, animal patterns.
- Build here first and then consider expansion to untouched areas.
- The park employees would have a greater sense of community in Moose than in Kelly where most of the residents are individualistic and keep to themselves.
- While NPS workforce housing is needed, Kelly is not the proper location for such housing. Infill, higher-density, and clustering in Moose or other existing park housing centers is preferable due to the pre-existing development, infrastructure, and high-use/environmental impact.
- The park explains that their employees want to live close to Jackson and that they want a sense of community. The park already has both of these qualities in Moose, park Head Quarters. Moose has building sites, a waste water treatment plant, a store, a restaurant, a bar, a gas station, all with fantastic views, all less than a mile of where most park

employees live today. Kelly has none of the above. Kelly is farther from Jackson and with a road that is sometime not serviced or plowed.

- Kelly doesn't have needed infrastructure for expansion, whereas other locations do.
- It has been related that there is space in Moose for 10 units. Why not start there? Then, perhaps, one or two thoughtfully designed units in Kelly where all the above would not be necessary? A smaller ecological footprint.

Commenters express concerns about developing additional housing in Moose.

- As for development of available lots in Moose before considering Kelly, determining related impacts on wildlife will be dependent on exactly where the new development would occur. The Snake River riparian/floodplain forest corridor is some of the highest quality and most important wildlife habitat in the park. It also serves as a critical wildlife movement corridor. As such, the location of park headquarters is not one we would choose today. Accordingly, when at the park, I was a strong voice for mitigating impacts to wildlife in this area, partly because I knew that, despite the intensity of development, critical wildlife movement still occurred there. I believed then, and still believe, maintaining it should be a high priority. The attached figure shows where movement occurs. This is based on personal observations of mine and others, as well as radio collar data. Among the three corridors shown, the one west of Moose gets the most use. In recognition of the importance of this corridor to wildlife, the park transportation plan's proposed relocation of the park entrance stations and north termination of the Moose Wilson (MW) Road to the vicinity of the Chapel access road, along with removing the existing road between the Murie Center access and newly aligned MW road, was designed specifically to help maintain and reduce impacts on this corridor, in addition to other advantages. The thin strip of aspen the corridor follows east of the park road and continuing across the Chapel road I believe is critical to maintaining wildlife use, so extending Moose housing in that direction is not a good idea. I don't know where the 10 potential Moose housing sites the park has referred to are located, but I hope it is not here. Given the importance of the Snake River corridor for wildlife movement, I believe new development in Moose that may affect permeability of the area to wildlife should be avoided.

Commenters state housing should be dispersed in Kelly rather than in the proposed location:

- Dispersing housing throughout Kelly would integrate into the community better.
- Build in core of Kelly.
- Put some in Moose where there are spots already and then put others in dispersed locations in Kelly.
- Build in Kelly after all available units in Moose are utilized.
- If the park feels development must be done in Kelly between third and 4th street is way better; but still not great.
- I strongly favor any housing to be spread out in Kelly, with 1-2 houses sharing the water and septic systems already in place for the 4 park houses, with Lorraine Bonney's cabin being a 5th park owned location with preexisting water and septic.

- I think Kelly is a logical place for a small amount of housing. I would like the housing to be in the most central portion of Kelly. I think it should add to the feeling of a town rather than sprawl.
- To limit impacts on wildlife, I have always been a proponent of clustering development in the park. And because of this, I have been a supporter of limited park housing in Kelly, clustered within the area's current development footprint.

Commenters make other general statements about options for housing or exploring other options:

- Want thorough analysis of other locations.
- Consider all alternatives with a smaller footprint.
- We support housing full-time NPS employees, especially families, but there is no need to create more rural/suburban sprawl. Please be a model for Jackson Hole, Teton County, and the NPS at large. Set high standards for housing and development. You had a chance to be a part of the Nelson Drive housing proposal. You can't say 'no' to Nelson and then propose sprawl in Kelly instead. Please be smart, creative, and open-minded about exploring options other than Kelly.
- These would be significant structures and green building designs and environmental conservation should be considered. Water catchment systems and sustainable practices, although more expensive should be used to preserve the environment.
- After all other locations are exhausted, build in proposed site rather than on individual sites within interior of Kelly.
- Spread houses out – 2 or more by Tex Little's Place.
- Consider Moran.
- Cluster house to leave room for wildlife (don't expand footprint).
- Utilizing the paved road way, in place, for single or double homes, two story, garage on first floor, will be efficient and the least increase in impervious surface.
- Should build a few houses in central Kelly and the rest at Mormon row and Moose. Mormon row has lots of tourists in the summer and is close to the highway.
- New buildings should not be built on park property that would require extensive development, infrastructure, or to take away any open land used by wildlife. Kelly is undeveloped and should remain as such.
- Should be low density and natural landscape.
- Why does it have to be single family dwellings?
- Expand up not out.
- Park housing should be outside the park.
- Build in Jackson Hole.
- Build it where utilities already exist.

- Build it near the buildings and areas where these workers will be needed.
- Only build on platted area already owned by NPS.
- Near the fish hatchery or close to the airport would be good for minimizing impact on wildlife and not compounding problems on the GV road.
- Prioritize development within already disturbed areas.
- Use other locations that already have infrastructure.
- The park needs to take a much closer look at spreading necessary staff housing among other park communities. As was noted by Rusty, there are four to five building sites available in Moose and one in Beaver Creek. A look at the Teton County GIS property ownership map, and a drive along the staff housing at Moose, indicates that there could be even more room to place this housing, clustering the development and saving valuable wildlife habitat in other locales.
- There also appears to be ample opportunity to put some, or all, of the proposed twelve homes and garages on park land that lies between the Warm Springs and Nichol Springs Roads near the southern boundary of the park east of Highway 89. There is much to recommend this site: I believe the homes would have less impact on wildlife than at the Kelly site; the development is a shorter drive to park headquarters in Moose than it would be from Kelly; and the new homes could be situated so they wouldn't block anyone's view.
- If buildings can be renovated or new building can be built on lands already occupied by people those options should be explored first.

Commenters state that the housing should be limited to NPS employees:

- NPS employees only (not foundation or concessionaire employees). Not for park partners.
- The people of Kelly have been advised that members of the Foundation are somehow eligible for the proposed 12 units. It seems evident that this is not solely about necessary park employee housing due to shortages—perhaps that is why the park calls it "work force" housing rather than park employee housing. These units would be available for members of this private, well-funded organization; likely individuals who can well afford housing in Jackson Hole but are hoping to score a house right in front of the Tetons surrounded by the park built by taxpayer dollars. When the park takes or buys land the expectation is that it is for conservation and preservation. The expectation is it is not for development.

Commenters state a pathway should be included as part of the proposal:

- Bike path connecting GV campground/Kelly/Warm Springs.
- Would like bike/pedestrian connectivity and long-term community infrastructure planning.
- Pathway from Kelly to Jackson via the elk refuge should be included in the project.

Commenters state the land should be used for something else:

- Conservation approach – possible community open space or partnership conservation approaches.
- Use this land for something for tourists to enjoy. (park or picnic area).
- Consider conservation easements on in-town lots.

Power/Energy

Commenters make statements about impacts to power or energy from the proposal:

- Power reliability is another issue as outages already occur due to the area's rural nature. Adding more demand would likely worsen these problems.
- How much energy would be needed to sustain development?
- Hopefully the park will use sustainable building practices and consider alternative forms of energy in their development.

Preservation/Purpose of Land

Commenters make statements or express concern that the land was designated for restoration/preservation and shouldn't be developed/used for housing:

- Area was previously saved/acquired for animal migration. Supposed to be returned to natural state/restored to natural conditions. Should remain home to the animals.
- Deed restriction in the sale from Dean and Ira Driscoll?
- Land has been preserved for wildlife and conservation. Land is for wildlife.
- Concerned about development of property the park bought for conservation purposes.
- Lifetime lease- property to be returned to its natural habitat.
- It's my understanding when the private land at the Kelly site was handed over and sold to the park it was to be returned to its natural state. Ron Wood who knew these people (and was out of town during the question and answer meet and greet) said those people would be rolling over in their graves if they knew GTNP was not honoring their agreement.
- When the old timers with lifetime leases sold to the park the understanding was that their land would return to a natural state. Dean and Iris Driskell, Lorraine and Orrin Bonny, Ken and Rita Carlson, Ethel Jump, Sue Fullerton and others all believed that the National Park would protect their land from development. I believe that you should honor that agreement.
- It is my understanding that the Kelly residents who sold their property to GTNP wanted their land to revert to natural habitat, not be built upon. I knew Lorraine Bonney well, and that is my understanding from conversations with her over the years.
- Putting NPS housing in Kelly is an abandonment of long-held park goals and wildlife needs. You are discrediting the efforts of many who have come before you.
- This is a major wildlife corridor for moose, bison, elk, and deer. These parcels were

purchased by the park during the "willing seller/willing buyer" era with the intention and understanding of returning the ground to its natural habitat, not for development. The intent was always conservation, thus the NPS bulldozing the previous structures years ago rather than refurbishing them as was done at many other park locations, because development was never part of the agreement.

- Detrimental effects from housing development should be studied in depth and do everything possible to reduce footprint on land dedicated to preservation Protected wildlife land.
- Platted lots are already rewilded.
- Shouldn't build on undisturbed natural land.
- These park lands belong to the citizens of the U.S. and are meant for protection not development.

Safety

Commenters express concern about decreased safety from new people living in Kelly:

- Public safety is also a concern. More people mean more risk--particularly with wildlife encounters involving individuals unfamiliar with living in close proximity to large animals.
- Public safety?, well, keeping all the staff near the headquarters of the park makes the most sense. Less travel, less cost, and builds the community for the workforce if they are all closer to the headquarters.
- With more people, will come more strangers which reduces privacy and the feeling of safety.
- Concerned about safety on the roads.
- Strangers in the community will make residents feel less safe.

School

Commenters make statements about impacts to the Kelly School:

- Concerned about overcrowding of the Kelly school.
- Park families could take advantage of the Kelly School.
- How would additional kids in Kelly be incorporated into the Kelly School? Is there room for additional students? If not, who would get enrollment preference?
- Increase will stress the school, and no tax revenue from park residents using the school.

Socioeconomics

Commenters make statements about socioeconomic impacts from the proposal:

- More expensive to build in Kelly (as compared to Moose) because infrastructure does not exist.
- Reduced tourism dollars that benefit the area.
- The further intrusion into the Kelly community is more disruptive to Kelly and more expensive than expanding in Moose.

- Need comparative cost information for building and maintenance this expansion Moose v Kelly.
- I think it will be more expensive to the taxpayer and will degrade the wilderness experience as a visitor into the backcountry.
- Building in Kelly would require extensive and expensive construction for needed infrastructure. Basic infrastructure exists in Moose with less disruption to wildlife habitat, tourism and efficient land use.
- Tourism generates revenue.
- This would be a significant population increase.
- It is a needless and wasteful use of tax revenue for the construction of new sewage, water, and transportation infrastructure to support this land development project when such facilities already exist.
- Concerned about decreased property values/economic impact on existing residents/homeowners.
- I've heard the quick-fix problem solving argument that says, if more employee housing was built in Moose, the water treatment facilities would need a costly upgrade. This doesn't make sense. It seems that it would be much more costly to build a new subdivision in Kelly because of; new construction, roads, water treatment, space for additional structures like - dumpsters, propane tanks, park vehicles, private vehicles, storage sheds, fences, and the many unforeseeable or unpredictable structures. This seems a lot more expensive than building in Moose where roads exist and there is a water treatment apparatus in place.
- Provide full transparency on financial impacts of each housing development plan.
- There is also concern that this project is exempt from local and state regulations and ordinances with which the residents of Kelly must comply but can be disregarded by the federal government at their discretion. There is also a concern that the 12 unit residences will not pay property taxes but their children will use and impact the school. Payments in Lieu of Taxes (PILT) are paid to the County not to a specific school and the federal government pays less than \$1 (one dollar) per acre of land in Teton County. In 2025 the federal government paid \$2,528,823 for 2,619,739 acres as PILT payments. https://pilt.doi.gov/counties.cfm?term=county&state_code=WY&fiscal_yr=2025&Search.x=36&Search.y=15
- I'm aware that the cost of this project will increase if modular homes are erected in separate locations, for instance at Moose, Beaver Creek, and the Warm Springs–Nichol Springs site. However, these increased costs must be seen as helping to sustain GTNP's mission, which was clearly laid out in the National Park Organic Act of 1916: "[T]o conserve the scenery and the natural and historic objects and the wild life [sic] therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." To that end, I think that the Grand Teton National Park Foundation can play a key role. Given the Foundation's outstanding fund-raising record, I don't think it's a stretch to say that it will be able to make the case that not building adjacent to Kelly, and preserving that wildlife

habitat, is worth the extra cost associated with dispersing staff housing to other sites. Some of this housing should certainly be allocated to the Foundation's employees in acknowledgement of the role it has played in enhancing visitors' experiences as well as securing the extra funds needed to purchase the Kelly Parcel. In this regard, I would ask that when Ryan takes the park's staff-housing proposal to the Foundation board for approval that its members are not asked to approve a project in Kelly, but rather a project anywhere in the park. That leaves their decision-making wide open.

Traffic

Commenters express concern about impacts related to increased traffic from the proposal:

- Concerned about more roads and increased traffic in Kelly.
- Concerned about increased number of vehicles on Main Street between the entrance to Kelly the potential site.
- Need steps to reduce traffic.
- Don't want more traffic on roads, trails, riversides.
- Traffic on GV road and roadkill.
- Twelve families and their cars aren't going to change the feeling of Moose, whereas the vehicles of twelve families added to Kelly will drastically change the life of everyone who lives on the north end of the village, making a quiet street far busier, noisier, and less safe.
- Would threaten pedestrian use of roads.
- Park needs to be transparent about the increased traffic and how that will be handled by the park.
- The road at the intersection will need to expand in both directions.
- Roads are not designed for increased traffic. Increased vehicle use would make it unsafe for children and pets.
- Also, the added number of cars along Gros Ventre Road would be detrimental to wildlife crossing the road, especially at night. Responsibility to protect parks?
- Road kill: It is not uncommon at all to see a dead animal; hit by a car, on the side of the road. Or, a car with it's front end smashed, from hitting an animal on the side of the road. It is often unavoidable. Most of us in Kelly drive very slow especially at night on this road; still, just this winter alone I know of three collisions by locals (1 moose, 1 elk, one deer). Development would add to this problem. The wind and the weather can be terrible on the GV road. There have been many days since I've lived here where it's just not an option to go anywhere because of the GV road conditions.
- The Gros Ventre Road is a busy place for wildlife. Every year traffic gets worse and worse on the Gros Ventre road. There are more wildlife tours, Concierges at the hotels direct tourists here to maybe see a moose. The campground is busier than it's ever been. There are often RV's that can barely fit in their lane on the narrow road. The secret is out about the red hills so more and more people are going there. The road (without a

shoulder) has become more popular for bikers and bike tour groups. Many of the people who travel this road are looking off to the distance for wildlife and not paying attention to safe driving. Cars and tour groups frequently stop in the middle of the road without their hazard lights on. It's not uncommon for people to stop or park on blind corners. In the fall hunters are acting crazy on the road. All of these things would be compounded by more development. Kelly has no services so everyone who would live in the proposed GTNP development would have to drive for everything: work, groceries, services, everything. Half of the year (when Antelope flats is closed); Kelly is a dead end road, meaning the situation is compounded.

View/Scenic/Visuals

Commenters make statements about the view or impacts to visual resources:

- Development will be apparent in the scenic view lines to the east when driving south on the Antelope Flats Road toward Kelly.
- Best view in Teton County.
- One power line, road, building obstructs the view, scenery, beauty of a place.
- Workforce housing would be an eyesore.
- The view of the Tetons and the wide open space between Kelly and the Tetons that allows their majestic qualities to be seen like nowhere else.
- The view from the Sleeping Indian will be directly impacted by this proposed housing as will the pristine water.
- Aesthetics are a concern.
- Concerned about sight lines: new houses would be visible from existing residences (landscaping/vegetation screening as a mitigation to reduce visibility of houses).

Commenters state that the view or visual resources won't be impacted/would be improved:

- Kelly location for housing will not impact the view corridor.
- New housing will improve appearance/look of Kelly, which is currently run down.

Visitors/Visitor Experience

Commenters make statements about impacts to visitors or the visitor experience related to the proposal:

- Visitors will be affected by loss of wildlife. Would diminish the visitor experience.
- Reducing habitat will impact beauty of park for future visitors.
- How projects like this effect residents and non residents (who travel to the area to enjoy its scenery and wildlife).
- It would influence my choices to visit the area again and my respect the park service in its mission to protect and serve the wild community in this area.
- Would be less appealing to visit.

- Potentially, sub-optimal housing decisions harm the viability of the environment and wildlife habitat. For me, this sadly reduces the attraction of one of America's last wild places.
- People visit to enjoy the wildlife and the scenery.
- I visit the area and don't want to see the landscape change.

Water Resources

Many commenters expressed concerns about impacts to water quality and quantity from the proposal:

- Concerned about water quality and quantity.
- Kelly has a finite water supply that can't be further developed.
- Not enough water currently. Water for additional housing is not available.
- Need information on water table, surface and well water quality and on experience with stormwater drainage and flooding from GV River.
- Comparing the water-related considerations of other development site options.
- Many impacts on water to consider (Sewage, pollution, chemicals used to maintain the property, impact on fresh water, fire control capacity).
- What are the water related conditions?
- What is the water impact of the additional utility, what run off and contamination issues could exist, what is the risk to the town of water supply impacts.
- Concerned about Water, sewage of waste matters, resultant pollution.
- Seasonal variability, particularly how winter conditions and peak summer use affect water systems.
- Any history of water shortages, system strain, or failures in the area.
- Long-term maintenance and monitoring plans to ensure water quality is not degraded over time.
- I trust management and the park service to come up with optimum water solutions for wildlife and people.
- The people in the yurt park have been experiencing odd smelling and odd tasting water.
- The site in Kelly has several buried leach fields and wells. It was the yard of a construction company for decades. Who knows what could be buried there.
- Concerned about soil erosion and drainage from road and powerline development.
- Systems needed for the development would affect drainage and erosion.
- Is there a water-related reason Kelly is more suitable than Moose?

Commenters express concern about impacts related to the aquifer or groundwater from the proposal:

- Concerned about depleting aquifer in Kelly.
- Some wells already drying up.
- Will park pay to have existing wells drilled deeper.
- Concerned about the water table.
- Adding twelve dwellings to the community's already taxed water system seems like a poor idea.
- More data is needed on the 2 aquifers underlying Kelly. Along with others, and the park itself, i had to drill my 77' well deeper, maybe to 150' or more. Some wells have Ecoli/nitrites. Our water is on the very high end of hardness.
- We feel that the park subdivision will make more wells go dry especially since we are having less snow that feeds our water supply.
- With the housing will be a lot more man-made toxins going into the groundwater.
- Chemicals used in pavement will leach into groundwater.
- Need to understand Current capacity and limits of local water supply, including wells and groundwater sustainability.
- Impacts of additional demand from 12 housing units on water availability and long-term aquifer health.
- Accessing the water is another problem. In the last 2 years, 4 wells in Kelly went dry. The senior park staff have told us that there is a deeper aquifer that they will access. Do they KNOW if this will draw down the shallower aquifer and make more Kelly wells go dry? This question has not been sufficiently answered, nor have we got any empathetic feeling from the senior park staff regarding this issue.
- Kelly Elementary School also had to drill deeper about 10-15 years ago. On the EPA website, the historical measurements from Kelly Elementary School have shown increasing amounts of nitrates.
- Our community bathhouse does not have clean drinking water. Our well put in approximately 10 years ago goes down 270'. Even this far down the water still smells and tastes a bit like the Kelly Warm Springs. We have large filters that make it ok for dishes and showers but it is not for drinking, cooking and even questionable for gardening. Because of this I source (carry in) my drinking water from several other wells in Kelly. I have a very good understanding of the type of water we have here. The best water comes from the wells on the south side of the Gros Ventre. As far as the water on the north side of the Gros Ventre (where the development would be) some of the water is cloudy (silty), some of it is green, some of it tests positive for bacteria, it is all very hard, some of it smells like sulphur and much of it is not ok for consumption. Because of the Kelly Flood, Kelly is void of the topsoil that could filter water. The ground is mostly river stone and sand. It is extremely porous. The development site is upstream from every well in Kelly North of the Gros Ventre.

- Several Kelly residents already have problems with their wells either running dry or producing foul-tasting water. Providing water for twelve residences may impact Kelly's upper water table as well as the lower one, if the park finds it necessary to drill down to reach it. I offer this observation as someone who also has a personal stake in the matter, since my well is one of the two closest to the development. It was drilled to 125 feet, and currently I still have good water.

Commenters make statements about the wastewater or sewage/septic systems:

- Support value of advanced wastewater treatment system (for community?).
- Advanced wastewater treatment will address community concerns.
- Support existing homes to tap into proposed water and septic system.
- Will concentrated wastewater from 12 new homes adversely affect all of Kelly.
- Wastewater and septic system capacity, including risks of contamination to groundwater or nearby surface water.
- Local reports have named Kelly one of the "nitrate hotspots" in the county due to the concentration of private septic systems.
- Will new sewage treatment plant be required? Subject to review of approval?
- If the subdivision has a septic system, it will increase the nitrate levels and most of Kelly residents live downstream from the proposed site.
- Concerned that new development will affect other properties waste water and water systems.
- Need to understand projected usage and plan for septic / wastewater.
- Facing septic tank related water issues.
- What are the plans for water and sewage treatment? Want to see plans before development.
- Would need a community water source and public waste treatment.
- The septic system will likely be problematic and could contaminate other water sources. These units would include garages (a luxury in Kelly given land prices) and require their own water system involving substantial amounts of water which is in short supply in Kelly especially given the low snowfall this year. The park needs to be transparent about the water issues and the septic issue and provide detailed plans for residents to review.
- In terms of water treatment - new construction of a facility in Kelly would be needed because if the 12 units were on a septic system which requires leach fields, the water quality would be threatened for the existing homes in Kelly, the majority of which are downstream from the proposed site. Leach fields would increase the nitrate levels in the groundwater.

Commenters express concern about the stream/ditch adjacent to the project area:

- Will there be a set back from the ditch?
- There is an active stream adjacent to site.

- The proposed development is right next to a small ditch that is used by wildlife and livestock that will likely be impacted.
- The proposed site, on the east edge of town, sits right next to a water way that runs through town. Run off from all of the additional impervious service, road and roof, will increase the water entering the channel as well as degrade the quality of the water way.

Some commenters specifically express concerns about the Gros Ventre River:

- It also borders the Gros Ventre; a wild and scenic river.
- Essentially dewatered downstream in irrigation ditches, affecting fishing.
- Additional septs could impact the river water quality and drinking water quality in Kelly.
- Protecting the Gros Ventre drainage and its vital clean water as a source to support all wildlife is at the top of my priority list.
- It may also increase the nitrate levels in the Gros Ventre River which runs very near and downhill from the site.
- Neighbors' drinking wells, septic systems, and proximity to the Gros Ventre River- the burden of proof is on the NPS to adequately assess the hydrogeology and determine possible impacts from added pressure, additional waste, and human and environmental health & safety concerns (upstream and downstream).
- Conservative estimate: An additional 12 housing units at approximately 100 gallons of water per unit consumed per day plus the waste water associated with this use in proximity to the Gros Ventre River. What impacts would the water usage and wastewater have on the aquifer, existing drinking wells, and the health of the river?

Commenters make statements about the need for studies related to water resources and/or state studies should be shared:

- Hydro studies should be shared.
- An independent expert should assess the water supply robustness and any potential water quality impacts. Additional expert assessment of added sewerage needs expert and independent evaluation.
- We haven't got an answer about a deep, geologic study of the ground water and aquifers, nor regarding a thorough environmental impact study for the habitat and environment.
- Scientific data needed to ensure the aquifer is adequate.
- Doing a thorough study of the water table. As it stands, we've had four wells go dry, and other wells are producing foul-tasting water.
- Has a groundwater study been done for this proposed housing project? How many wells would have to be installed for this 12 unit subdivision and at what depth?
- A THOROUGH GEOLOGICAL, AQUIFER GROUND STUDY. WHICH HAS NOT BEEN DONE. AND AN ENVIRONMENTAL IMPACT STUDY.

- We want the National Park to have a deep geological study conducted of the aquifer and ground water and a thorough environmental impact study.

Wildlife/Wildlife Habitat

Many commenters expressed concerns about impacts to wildlife and wildlife habitat from the proposal:

- A number of wildlife that use this area (bison, moose, elk, deer, mountain lions, griz and black bears, river otters, beavers, bald eagle, osprey . Other raptors and songbirds , greater sage grouse. Pine martins, foxes, coyotes, badgers, Uinta ground squirrels, little brown bats, wolves).
- Specifically, how project development will affect habitat and migration of animals, insects, birds and any aquatic species.
- Building in proposed location will destroy natural habitat.
- Critical winter habitat for mule deer.
- The twelve proposed new homes and attached garages will destroy important winter habitat for mule deer who bed and seek shelter north of the cottonwoods that grow along the ditch adjacent to the proposed site.
- Concerned about expansion of footprint into wildlife habitat.
- Significantly altering their habitat will be extremely detrimental to their safe and natural existence.
- Impacts to nearby wetlands, streams, and riparian areas that are closely tied to local wildlife habitat.
- EIS should address impact on wildlife.
- Elk also use this habitat.
- With more people, there will be less animals and areas that have been rehabilitating will be trodden on and paved reducing browse for ungulates, food for smaller critters and safe hiding and nesting places for them.
- Prioritize habitat/nature over convenience/housing/business needs.
- Plopping 18 prefab units in a critical bottle neck for migrating animals near a waterway with ribbons of new pavement sounds like a painful and easy mistake.
- Wilderness and wildlife habitat should be protected from human encroachment in order to sustain biological diversity and resilient ecosystems.
- Study and consider the before and after from a wildlife perspective.
- The irrigation ditch, that now has survey flags on both sides of it, is major habitat for mule deer, moose, birds and insects of all sorts. ... It's notable many of these animals become uncomfortable or leave with human presence. I believe much of this little ecosystem would be lost to the park's proposed development.

Commenters state that wildlife won't be impacted because of nearby habitat:

- Other habitat is available nearby – wildlife will simply move there.
- Mule deer will move to sagebrush area 100 yards away.
- My opinion is that the impacts of the park's current proposal on wildlife will be insignificant. The Kelly area is rich with wildlife. Moose, elk, and deer are common in and around Kelly, as are bison to some extent. However, I don't believe the proposal will impede or block movements, including migrations, of any of these species. There is considerable movement of all these species just east of Kelly, however, and because of that I would not recommend development that expands further east than the current proposal.
- While there is documented use of the proposed site by a variety of wildlife, I don't believe that it contains critical habitat for any species. However, there will be direct impacts of displacing wildlife from the site, and indirect impacts associated with its human activity, including wildlife avoiding habitat in the immediate area. These impacts could be largely avoided by developing lots the park owns in Kelly's interior, rather than the proposed site on its outskirts.

Many commenters expressed concerns about impacts to the wildlife migration corridor from the proposal:

- This land serves as a migration corridor for deer and moose.
- Development would change migration and habitat patterns for several species including mule deer and elk.
- Don't destroy habitat and corridor for convenience of staff or visitors.
- The location in Kelly is essential year-round habitat for all the ungulates and carnivores that reside or pass through that location during annual migrations.
- Some of the important historic migratory pathways for ungulates pass through and around Kelly.
- Request that the National Park Service fully evaluate the cumulative impacts of this proposal under NEPA and select an alternative that avoids harm to critical wildlife habitat and migration corridors.
- The valley edge east side of Kelly is a critical connection between the newly purchased Kelly parcel and the Elk Refuge. Maintaining this corridor for migrating wildlife and resident, local wildlife seems like common sense. This slim buffer teams with both diversity and density. I have seen, thousands of elk, whitetail, mule deer, wolves, coyote, red wing blackbirds, swans, moose, Black bear, one grizzly, otter, cranes, eagles, osprey, hawks, ducks, small fish fry.
- Has a study been done to evaluate this and how it will impact the animals that migrate through this area. How will they be impacted.
- The Gros Ventre Corridor is a major wildlife migration route and these units would be placed directly within it.

- Animals (especially elk, deer, antelope, wolves and bear) travel this area. There are two main migration routes. One from the red hills, through the Gros Ventre River canyon (just east of the development sight) out toward Blacktail Butte and the meadows that lie between and all the way north to Yellowstone. The second migration is from the elk refuge to the south moving north into GTNP and Yellowstone. On this route I frequently see elk, deer antelope, bison and wolves. It's also worth mentioning many of these species become spooked when near humans. Very close to the proposed development is one of the first spots elk visit when they leave the refuge in the spring. Developing this area would run counter to the refuge's goal of dispersing the elk (off the refuge) at a time when chronic wasting disease is entering these animal populations. If one was to draw a wide line on a map marking these two migration routes they would intersect at the site GTNP wants to develop.
- These structures, if built, will also block an important migration corridor for the mule deer and moose. At present, they move back and forth between park lands east of Kelly, the twenty-acre Kent parcel in central Kelly, and park lands to the north and west of the village. Moreover, the proposed site lies next to habitat on the Teton Valley Ranch that is occupied by thousands of migrating elk each April and May. Many of these elk drift onto the land presently staked out. Numerous peer-reviewed studies have demonstrated that elk avoid humans at all times of the year. Putting staff housing in this location will effectively push and keep elk away. See among many articles: Simone Ciuti, et al., "Effects of humans on behaviour of wildlife exceed those of natural predators in a landscape of fear;" Ganz, T.R., et al., "Cougars, wolves, and humans drive a dynamic landscape of fear for elk;" and Leslie Naylor, et al., "Behavioral Responses of North American Elk to Recreational Activity."

Zoning

Commenters made comments about zoning concerns related to the proposal:

- Consider rural area legacy neighborhood conservation zone.
- Rural Legacy Zone.
- Consider Teton County land development process.
- The placement of the dense housing development to the east of Kelly "proper" adds undesirable sprawl where there is now space for wildlife .That placement conflicts with the current footprint of Kelly housing development. If this was private land, not park, it would not be acceptable under Teton County zoning codes for private rural land. Also, the alternate plan developed by resident Ted Kerosote clearly identifies other lots in the park that would be ideal for this housing.
- Teton County Tiered Resource Overlay - to evaluate new construction that could impact natural habitat.
- This housing development is a very large scale development for Kelly and too large for the size of Kelly. A project this size needs to be built where density is allowed in our county and needs to follow the Comprehensive Plan of Teton County regardless of federal public land or private property.

Appendix A – Civic Engagement Materials



WHY WORKFORCE HOUSING, AND WHY KELLY?

Grand Teton National Park depends on year-round staff to protect natural and cultural resources, ensure visitor safety, and maintain operations. In Teton County's constrained housing market, the availability of stable housing directly impacts the park's ability to hire and retain those employees.

ABOUT 95% OF GTNP'S WORKFORCE RELIES ON PARK-PROVIDED HOUSING.

Over time, the park has evaluated multiple housing locations. Kelly is one area within the southern portion of the park where housing is being discussed.

WHY KELLY IS BEING CONSIDERED

- The area under discussion is park-owned and previously disturbed.
- The site is within the county-designated community development area.
- Other potential workforce housing sites in the park, including Moose and Beaver Creek, have more limitations to land availability, wastewater, environmental factors.

POTENTIAL VISION

- Approximately 12 small, single-story homes.
- Intended to house year-round park employees.
- No apartments or seasonal dormitories.

NO DECISION HAS BEEN MADE TO BUILD HOUSING IN KELLY.



WE WANT TO HEAR FROM YOU:
What perspectives do you have about the park potentially building workforce housing in Kelly? Please submit comments using the QR code.



WATER: AVAILABILITY, QUALITY & WASTEWATER TREATMENT

Water protection is a primary consideration in evaluating any potential housing concept. Questions about groundwater availability, well performance, and long-term water quality are central to considering Kelly as a potential site for workforce housing.

Water-related considerations will inform whether this conversation advances to any future planning stages.

WE ARE LISTENING TO YOUR CONCERNS ABOUT

- **WATER QUALITY AND GROUNDWATER PROTECTION, PARTICULARLY GIVEN PROXIMITY TO THE GROS VENTRE RIVER.**

Residents have emphasized the importance of protecting groundwater resources and ensuring that any potential development would not adversely affect nearby wells, septic systems, or the Gros Ventre River corridor.

- **LONG-TERM WATER AVAILABILITY AND IMPACTS ON EXISTING WELLS AND SEPTIC SYSTEMS.**

Questions have been raised about overall system capacity, long-term water supply, and how additional housing could influence impacts within Kelly.



WE WANT TO HEAR FROM YOU:

What information would help you better understand water-related considerations as it pertains to workforce housing in Kelly?
Please share your input using the QR code.



ENVIRONMENTAL & COMMUNITY CONSIDERATIONS

Community conversations have raised important questions about environmental protection, community capacity, and long-term impact

WE ARE LISTENING TO YOUR CONCERNS ABOUT

- **WILDLIFE MOVEMENT AND HABITAT CONNECTIVITY, INCLUDING SEASONAL MIGRATION PATTERNS.**

We understand the importance of maintaining wildlife permeability and understanding how development could interact with established movement corridors.

- **TRAFFIC, ROADWAY SAFETY, AND INFRASTRUCTURE CAPACITY.**

Residents have asked how additional housing could affect traffic volumes, road conditions, emergency response access, and the capacity of existing infrastructure.

- **RURAL SCALE AND NEIGHBORHOOD CHARACTER, INCLUDING DENSITY AND VISUAL CHANGE.**

Many have expressed concern about preserving Kelly's current development pattern, open views, and the overall visual character of the community.



WE WANT TO HEAR FROM YOU:

What local knowledge should inform the evaluation of environmental protection, infrastructure, public safety, and community development?
Please share your input using the QR code.



COMMUNITY CHARACTER & BEING A GOOD NEIGHBOR

Kelly is a year-round community with a distinct identity shaped by its residents, natural landscape, and rural character. As workforce housing is considered, the park is committed to ensuring that any potential housing is thoughtfully evaluated for its effects on neighborhood stability, community character, and the park's role as a good neighbor.

WHAT IS BEING CONSIDERED

- **COMMITMENT TO YEAR-ROUND RESIDENCY.**
The concept under consideration focuses on housing permanent, year-round park employees and not seasonal or transient populations.
- **MAINTAINING RURAL SCALE AND CHARACTER.**
Any housing concept being considered would be modest in scale and intended to align with Kelly's existing development pattern.
- **BUILDING TRUST THROUGH TRANSPARENCY.**
The park recognizes the significance of this process for the Kelly community and is committed to engaging its residents directly, sharing information openly, and communicating decisions.
- **COMMITMENT TO BEING A GOOD NEIGHBOR.**
The park provides neighborhood services in Kelly, including snow removal, road maintenance, and emergency response coordination.



WE WANT TO HEAR FROM YOU:

What aspects of Kelly's community character are most important to you and why?
Please share your input using the QR code.

Appendix B – Correspondence Received