

June 3, 2010

Teton Board of County Commissioners, Mayor Barron and Jackson Town Council
cc: Jeff Daugherty, Tyler Sinclair
Re: Proposed Environment Commission/Natural Resources Technical Advisory Group
Submitted via email

Dear Teton County Commissioners, Mayor Barron and Jackson Town Council,

On behalf of the Jackson Hole Conservation Alliance, thank you for your attention to these comments. We appreciate the energy that has been spent throughout your months of discussions surrounding the proposed Environment Commission. After reviewing the latest proposal for a Natural Resource Technical Advisory Group (NRTAG), as an alternative to an Environment Commission, we have several questions and concerns. While we of course hope that you will take action on this sooner than later, we also want to make sure that the nature of the committee, including its mission, is not ultimately watered down and is in fact the best step forward for our community. Because wildlife protection (at the ecosystem level) is the community's highest priority, it's important to get the initial foundation for this commission/group right. As we have stated before, we believe that the mission and work of this group should more closely resemble the descriptions brought forward in earlier staff reports (October 2009). In order to do this, some of the previous work should be better merged with the positive changes and clarifications brought forward in the latest proposal. Without this step, the new proposal should not be a substitute or replacement of the original proposal in its entirety.

We submit these comments with the understanding that no additional information or staff reports have been released since the May JIM meeting. **Our main concern centers on the proposed shift in mission for the NRTAG from the Environment Commission.** The original mandate, to enable a body whose charge it is to take an objective, expert look at our *valley-wide ecosystem* and its health, has been replaced with the idea of a group that will primarily respond to joint directives from local elected officials. While of course elected officials would be involved in either form at some level, the more recent proposal too significantly removes the opportunity for a more objective, independent, and long-term compilation of recommendations on the Teton region's ecosystems. To carry out long-term monitoring programs and to be able to design programs to monitor and manage cumulative impacts, directives must extend through and beyond political cycles and across jurisdictions.

In short, some of the fundamentals of the proposed NRTAG appear to run contrary to the original goal of improving the valley's best available science on a comprehensive level, particularly given that the research priorities are to be set "exclusively" by the elected officials and that funding will be allocated on a project-by-project basis. The entire point of having a separate commission was the recognition that experts in different ecological disciplines would be the individuals who have the expertise to set research priorities and identify projects of critical importance, not elected officials who sometimes lack specific scientific expertise. Overall, it would be helpful to clarify the intent of this shift in mission and purpose; perhaps just minor shifts in language could better explain how the NRTAG would function. For example, will this group meet on a monthly, regular basis, or will this group meet only if directed by elected officials to address a specific topic? Or, will both the town and county have to recommend approval for broad directives to move forward, such as in the case of a directive to update the Natural Resources Overlay, which should include an assessment of both jurisdictions? Overall, we agree with the intent of the NRTAG, but we think additional clarification is needed prior to moving forward.

Briefly, following are a couple of other recommendations and questions:

We also hope that you revisit the detailed “qualifications/expertise” and “responsibilities” outlined by staff in October 2009. The information provided in these initial reports – as opposed to what was released in the most recent memo on the NRTAG – is generally more specific and therefore more helpful in clarifying these specific topics. We hope that these previous efforts (language, structure, etc.) will be efficiently incorporated into the final proposal that you vote on.

To better understand the Teton Conservation District’s proposed supervisory role for the group “during the initial term”, is the proposed memorandum of understanding with the Teton Conservation District available for review?

In closing, *it is important to acknowledge that we cannot afford to make irreparable mistakes with our wildlife and natural resources.* The longer we wait, and the less we commit to when we do move forward, the higher the risks to wildlife in the long term. There seems to be general agreement that policymaking should be informed by the best available science and information, and an Environment Commission is one of many future steps this community must take to ensure that this happens. We look forward to clarification of some of these outstanding issues and questions so that this important concept can be implemented.

Please feel free to contact us with any questions, and again, thank you for all of your work on behalf of our community.

Sincerely,



Kristy Bruner
Community Planning Director



Becky Tillson
Community Planning Associate



Jackson Hole Conservation Alliance
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Re: Environment Commission/NRTAG

*Below are the comments Becky Tillson, Community Planning Associate, verbally presented at the **June 7, 2010**, Joint Information meeting.*

Becky Tillson, Jackson Hole Conservation Alliance. Thanks for the opportunity to comment today.

We have submitted comments throughout this discussion so you know where we stand – we're in support of a strong and independent Environment Commission. We still have a few outstanding questions, though, that we thought we would bring up today.

First, what is the role of the Conservation District versus the planning staff in the proposed commission or technical advisory group? Why is the planning staff no longer involved, even in the preparation of staff reports for these meetings? I spoke to several people and was unable to find a staff report or a lead person on this. Who is the lead contact on this now, and who will be in the future?

Second, is there a draft Memorandum of Understanding between the Town, County and the Conservation District? If so, will it be available for public review prior to its adoption?

Lastly, it will need to be clarified if this commission is now going to respond to joint directives because it represents a fundamentally different mandate than was previously on the table. As we have stated before, we believe that an Environment Commission – or Technical Advisory Group – needs to be able to set its own research priorities, beyond political cycles and shorter-term goals. This concern carries into the idea that the funding structure for this body is to be project-specific.

This is a clear community priority and was recommended to you by a unanimous vote from the planning commissioners. You have been discussing this issue for quite some time. Thank you again for your work on this and we hope that you can clarify some of these outstanding questions and enable this commission sooner rather than later. Thanks.