



November 25, 2008

Teton Board of County Commissioners  
cc: Jeff Daugherty, Planning Director  
Amy Kuszak, Senior Planner  
Submitted Electronically

Dear Commissioners:

On behalf of the Jackson Hole Conservation Alliance, we would like to provide a brief follow-up to our June 10, 2008 correspondence regarding the EA consultant amendment, AMD 08-007. As we indicated in previous public comment, we fully support the intent of the amendment, which will work to bring unbiased review of development-related impacts on wildlife and other natural resources of Jackson Hole. The purpose and objectives for which Tony Wall and Forrest McCarthy brought this amendment forward are well-substantiated. Overall, an approval of this amendment would demonstrate a commitment to ensuring the sufficient review and analysis of your constituents' highest priority – the region's unparalleled wildlife and other sensitive natural resources.

We have a few comments regarding the latest language revisions. We appreciate the work that has been done to clarify the procedure for hiring consultants. These modifications should remedy some of the previous concerns. We recognize the benefits of having a pool of consultants versus one contracted consultant for a specified period. However, particularly given the proposed option to include a pool of consultants, we fully support the applicant's recommendation to apply this amendment to ALL – minor, intermediate and major – development applications.

Specifically, given the clarification of hiring procedure and process, the incorporation of language to include a pool of consultants, and the overall objective of the proposed amendment, it is logical to apply this amendment to all types of development proposals. Ideally, the scale of any single development should not be the sole determinant of whether the consultant is County-hired. Parcels, small or large, vary in terms of the quality of wildlife habitat or sensitivity to development-related impacts. Available science supports the concept that a small project in a sensitive or critical area could cause significant impacts. While we recognize that larger projects may draw closer scrutiny to environmental reviews on a practical planning and decision-making level, the basis for supporting unbiased review and analysis should extend to all circumstances. For the sake of supporting the need for consistency and objective application of the purpose of the amendment, we urge you to give serious consideration to amending the language so that it applies to all development proposals.

Again, we are grateful for all the work that has gone into bringing this amendment forward. We urge you to adopt this amendment, and in a form that it will apply to all development proposals, as recommended by the applicants.

Sincerely,

Franz Camenzind  
Executive Director

Kristy Bruner  
Community Planning Director