

October 29, 2018

Board of County Commissioners
Teton County

Dear Commissioners:

Thank you for the opportunity to comment on your review of proposed changes to the Grand Targhee mitigation plan.

The Alliance believes we have a responsibility to write land use rules, including resort masterplans, that align with our community's vision as articulated in our Comprehensive Plan. This is a vision of a community with walkable neighborhoods surrounded by protected open space, working agricultural lands, and connected wildlife habitat. We want more acquisition of permanent open space for wildlife habitat protection, scenic vista protection, and agriculture preservation.

We were involved in past community discussion of the Grand Targhee resort masterplan adopted in 2008, including the significant mitigation requirement. **If you decide to change the mitigation plan, we ask that you ensure the new plan provides at least as much conservation value.** We do not believe that you have enough information in front of you to make this determination. Please ask your staff to research, or hire consultants to analyze these key questions:

How does the conservation value compare?

It is not yet easy to quantify conservation values. Quantifying ecosystem services is a growing field of academic research, but it remains difficult to do an “apples to apples” comparison of different mitigation proposals. However, you could ask staff or a consultant for a rough understanding of:

- What was the conservation value of the current plan (600 acres of conservation easements + more from 1% transfer fee) supposed to be? Was it enough to offset the ecosystem harm from the development?
- What would be the conservation value of the new proposed plan?

Although we do not believe that funding a pathway is at all equivalent to funding conservation easements, easements or riparian/streambed restoration work in the Teton Creek Corridor project could provide significant conservation value. Our 2018 *State of Wildlife* report and the recent countywide *Focal Species Habitat Map* have highlighted the importance of riparian corridors for our wildlife habitat and connectivity. We are impressed by the collaborative work and vision of the Teton Creek Corridor project partners.

We reviewed the Alder Environmental memo attempting to compare conservation value between the two options. The Alder memo clearly explains why quantitative comparison is difficult. “Table B” makes a strong case for the value of supporting the Teton Creek Corridor project. “Table A” compares the current Targhee mitigation plan to the *entire*

Protecting the wildlife, wild places, and community character of Jackson Hole.

685 S. Cache St. • P.O. Box 2728 • Jackson, WY 83001 • (307) 733-9417 • info@jhalliance.org • JHAlliance.org

Teton Creek Corridor project, with a note that “Targhee’s contribution partial to the whole presented here.” *This highlights the key question: the Teton Creek Corridor project could provide excellent conversation value, but how much of that value will Targhee contribute?*

How does the dollar value compare?

We care more about the conservation outcomes than about how much each mitigation plan costs. However, if you can’t compare conservation outcomes, you could use dollars as a proxy to see if the new deal is likely as good as the old deal, since it is much easier to quantify dollar values.

- *What is the value of the current proposal?* How much would it cost to buy 600 acres of easements? We have heard estimates ranging from \$900,000 to \$4.8M. Please ask staff to research this question and provide evidence.
- *What is the value of the new proposal?* \$100,000 up front + how much would the additional 1% transfer fee on *initial sales* bring in?

If the new proposal would clearly generate much less funding (or conservation value) than the current proposal, please negotiate a better deal - perhaps a higher transfer fee on initial sales or sales in perpetuity.

Is up-front / phased mitigation important?

We heard concern that even if the extra initial transfer fee provides as much value as the current plan, that money will be back-loaded *after* development and sale and put more risk on the county and ecosystem. This would be most problematic if the project is built in one big push. Requiring phasing, as under the current plan, could ameliorate this concern. The worst-case scenario would be if the development project stalls mid-construction, and we end up with holes in the ground and no mitigation. Please consider performance bonds to ensure remediation even if the project doesn’t succeed.

Please do not accept any changes to the plan until you have carefully reviewed well-researched answers to the above questions, and can confidently declare that the new proposal provides at least as much conservation value as the current plan.

Thank you for your work for our ecosystem,

Sincerely,



Skye Schell
Executive Director
Jackson Hole Conservation Alliance