





December 4, 2020 Teton County Board of County Commissioners

RE: Letter of support for Hoback RV Park residents

Dear Chair Macker and Commissioners,

We were dismayed when Crowley Capital, LLC – after being charged with multiple significant violations of state and county environmental regulations – decided to suddenly evict longtime Hoback residents, many of whom are elderly, low-income, and vulnerable to COVID-19. Their latest statement offers some hope, but we are disappointed that it took a public outcry for them to consider alternative solutions, and we believe more must be done, both for the RV Park residents and for our larger community.

We urge you to use your regulatory power to protect Hoback RV Park residents.

We are grateful that Crowley Capital extended the lease (as requested by Inanna Reistad and the more than 1,200 community members who signed her petition¹) and is considering some kind of arrangement with Macy's Plumbing, again, after Ms. Reistad did the legwork to find such a solution. Yet, according to the residents, several issues must be addressed before Crowley's offer can be considered adequate, including:

- A full explanation of the meaning of "water services," to clarify that residents will be provided water to their taps for drinking and full domestic use;
- Why pumping individual RVs is a better or cheaper or less burdensome solution for the residents than pumping the septic tanks; and
- Consideration that Crowley Capital should contract with Macy's directly, given that some residents may opt out of an extended lease / pumping services and change the price.

Ultimately, we believe the burden should be placed not on those who are victims, but those who are responsible: Crowley Capital. We also believe that due to the County's own unfortunate role in Hoback's water crisis and this eviction – via lax permitting and regulations² – that the County ensure that residents' concerns are resolved as part of the violation settlement agreement between the County, the Department of Environmental Quality, and Crowley Capital.

Please prevent these tragedies in the future. The potential solution for RV Park residents is a band aid, and it is a stark reminder that an ounce of prevention is worth a pound of cure. And a solution for these 25 residents, as meaningful and absolutely necessary as it is, is not a solution for our county's larger issues and residents who may soon face a similar situation. Please prioritize these broader protection measures the County has thus far delayed:

¹ Petition to extend eviction

² Joint letter on wastewater planning for Northern South Park

- Adoption of the proposed public health rule (requiring early investigation into rising nitrates) that has gone to a "committee" that has not yet even been formed;
- Completion of the mandatory update to the County's Small Wastewater Facilities regulations meant to be completed in 2018, which should require mandatory inspection and maintenance³ for septic systems; and
- A Wastewater Management Plan that would outline treatment solutions and protect drinking water from being contaminated in the first place, which is identified in our Comp Plan.

These three measures, had they been in place, could have prevented this heartless eviction. Please prioritize action on these measures, so that when other nitrate hotspots face regulatory scrutiny, we do not find ourselves in this same predicament.

We must protect Hoback RV Park residents now, and we must protect our whole community into the future. We know that you share our outrage, and we urge you to act accordingly.

Sincerely,

Dan Heilig Dan Heilig

Wyoming Outdoor Council

Dan Leemon

Protect Our Water Jackson Hole

Bruh James Brooke Sausser

Jackson Hole Conservation Alliance

CC: Wyoming Department of Environmental Quality

³ Joint letter on SWF update