



NWCCOG POLICY: Letters of Support

PO Box 2308 • 249 Warren Ave • Silverthorne, CO 80498 • 970-468-0295 •
Fax 970-468-1208 • www.nwccog.org

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Author:	NWCCOG Executive Director		

Purpose:

NWCCOG regularly receives requests for letters of support (LOS) or letters of objection/criticism across a spectrum of issues and topics. Some are perfunctory and innocuous, while other requests may be inherently controversial among the diverse membership. There are enough LOS requests that it would be unwieldy (and untimely) for each to be vetted and formally approved by NWCCOG Council at one of the seven meetings each year, yet some requests deserve to rise to that level of approval. Prior to this policy the NWCCOG Executive Director (ED) exercised full discretion in handling LOS. When a LOS deserved the gravitas of Council approval with a signature by the Council Chair it was approved by the NWCCOG Council and sent out with Council Chair's signature on NWCCOG Letterhead. The majority of LOS requests do not rise to this level. The purpose of this policy and procedure is to establish some parameters to that discretion as to which LOS requests may be approved at a staff level with the ED, and those LOS which would benefit from (or require) formal Council approval may be better defined.

NOTE regarding QQ:

NWCCOG QQ Committee and the Watershed Services program specialize in the expertise to monitor state water policy and provide Comment Letters to state and federal agencies on evolving policy in a timely manner as well as to lobby at the legislature on water matters on behalf of the region and in defense of stated water policy interests. QQ Contractors are therefore afforded wide latitude by the QQ Committee to carry out that mission independent of NWCCOG Council or NWCCOG Executive Director approval.

LOS in support of ongoing programs or status quo funding:

The origin and nature of each request matters. Some requests come to Program Directors from their partner agencies and clearly align with defined program efforts, goals and priorities. For instance, jurisdictions participating in our broadband program have requested letters of support when they seek funding from other source for a project to which NWCCOG is familiar and has lent technical assistance, or a partner jurisdiction to our AAAA program may seeking additional support for a program which we already participate, such as a senior meal program. NWCCOG Program Directors have discretion to advocate for their programs or provide feedback to partner agencies on operational matters pertaining to their programs without seeking Council approval. Programs regularly extend NWCCOG support through their Federal advocacy partners to continue or adjust funding for that program. *When such requests precisely align with a NWCCOG program, for instance, requesting that funding continue for The Older Americans Act which funds AAAA or for LEAP which funds the Energy Program such LOS should continue to be extended at a staff level at the discretion of the ED and signed on NWCCOG letterhead with either a Program Director or ED signature. These shall be collected and submitted in the following NWCCOG Council packet for information purposes only.*

LOS requesting new legislation or policy, or on topics not specifically related to existing NWCCOG programs:

Others requests for LOS for NWCCOG to advocate or support a position on “new” upcoming legislation or policy making. These may originate from a member jurisdiction, NWCCOG staff or occasionally from a Congressional or state legislator or staff liaison. In general, NWCCOG LOS directed at state or federal elected officials advocating on policy change should be approved by NWCCOG Council. Other requests may be of regional importance to the membership and loosely or not at all align with an already defined interest of a NWCCOG program or adopted policy—Forest Service funding, for instance. These too should be vetted through formal NWCCOG Council approval.

LOS Conditions Requiring Formal NWCCOG Council Approval:

LOS situations requiring placement on an agenda and majority approval of NWCCOG Council present to be signed by NWCCOG Council Chair on behalf of the organization include:

1. LOS which would benefit from the Gravitas provided by formal NWCCOG Council action
2. LOS for NWCCOG submittal of a grant to DOLA (Council vote is required by DOLA)
3. LOS which the Executive Director considers may be controversial between members. ED may seek consultation from NWCCOG Council Chair in this determination
4. LOS on proposed State or Federal legislation, correspondence with State or Federal legislators or Executive Branch proposing legislation or a policy position
5. LOS for a New NWCCOG Program that would require additional Director Level FTE
6. LOS that states preference to fund one-member jurisdiction’s request over another in a competitive funding situation. This is distinct from simple, general support for a member jurisdictions request when multiple jurisdictions may be applying for the same grant.
7. LOS, Amicus Brief, or taking of a written legal position which may commit the organization to foreseeable legal expenses
8. Requests from any part to Amend the Regional Water Quality Management Plan (208 Plan) o
9. Finally, “Comment Letters” (CL) differ from LOS. CL, especially those involving matters such as water quality standards which can be complex both legally and technically, which are submitted to state or federal agencies should be reviewed by NWCCOG General Counsel. The General Counsel in consultation with the Executive Director have authority to decide if CL require approval of NWCCOG Council, or in the case of water, the NWCCOG Water Quality and Quantity Committee.