

October 4, 2018

Bridger-Teton National Forest – Jackson Ranger District
P.O. Box 1689
Jackson, WY 83001
Attn: Mary Moore

Submitted via email: comments-intermtn-bridger-teton-jackson@fs.fed.us

Attention: SKMR On-mountain Improvement Projects

Dear Ms. Moore,

Thank you for the opportunity to comment on the proposed Snow King Mountain Resort On-mountain Improvement Project. At the Jackson Hole Conservation Alliance (Alliance), we have been following the planning process around future development of our Town Hill and appreciate the opportunity to provide insight as to how this proposal may impact our town's community character, wildlife, and quality of life.

The Alliance represents over 2,000 constituents locally and works to protect the wildlife, wild lands, and community character of Jackson Hole. We believe that this valley can be a national model of a strong community living in balance with nature. We strive to make sure that we recreate in ways that respect wildlife and aim to have honest conversations about our decisions based on facts and data.

Summary and outline of comments

Upon review of the submitted Snow King Mountain Resort On-mountain Improvement Projects, we believe many elements warrant in-depth analysis. In these comments, we:

- Analyze the stated purpose and need for the project proposal
- Outline potential negative impacts to our community
- Outline potential negative impacts to area wildlife and natural resources
- Identify issues with specific project components
- Request additional alternatives for examination during the Environmental Impact Statement (EIS) process
- Express concerns with the community engagement process to date
- Provide additional documents and references for your review.

Purpose and need

We find a significant disconnect between the stated purpose and need and the actual components of the proposed project. Please carefully analyze whether the proposed project elements are necessary – or even beneficial – towards achieving the purpose and need. Then, please analyze other alternatives that meet the stated purpose and need without as many impacts to our community and wildlife. Specifically, we have concerns with the following:

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The stated “purposes” to be achieved through the proposed action are:

Purpose	Concerns
<p>To maintain and improve the winter sport infrastructure on National Forest System lands at Snow King Mountain Resort.</p>	<p>Much of the proposal – specifically, footprint/boundary expansion and summer profit-center development – is unnecessary to achieve this purpose. In the actual proposal there are minimal upgrades to the current footprint and existing ski runs, with most of the proposed development occurring in an unnecessary boundary expansion. As we explain below in our proposed “balanced vision alternative,” there are many on-mountain improvements that can be made to the existing ski runs, resort infrastructure, and terrain that would improve and maintain the winter sport infrastructure on Snow King, without expanding into wildlife habitat.</p>
<p>To provide new and innovative forms of year-round outdoor recreation for residents and visitors to Jackson Hole, using the existing resort infrastructure as the hub.</p>	<p>Much of the proposal – specifically, footprint/boundary expansion – is unnecessary to achieve this purpose. Snow King is proposing increasing their developed footprint by 250%, which suggests most of their development will be taking place outside of existing resort infrastructure. Snow King could clearly provide new recreation opportunities within the existing resort footprint. As stated above, improvements within the existing footprint would achieve this purpose without having to expand into valuable wildlife habitat.</p>
<p>To capitalize on the established relationship between the Bridger-Teton National Forest and Snow King Mountain Resort that connects visitors with the natural environment and supports the quality of life and the economy of the local community.</p>	<p>The proposal actively harms this purpose. Many aspects of this proposal stand to harm our environment and our quality of life. As we will highlight below, the impacts to the community from this development are significant and warrant deeper investigation. It is difficult to imagine that our quality of life will be improved by increased traffic, adding new jobs to an already unbalanced job to workforce ratio, increased ticket prices, and reduced free public access to our public lands. Adding in amusement park style attractions like ziplines does little to connect visitors to the natural world in a manner that respects the character of the community.</p>

The stated “needs” include:

Need	Concerns
<p>Improve and increase beginner and intermediate ski terrain, lifts, and facilities to serve as the primary ski</p>	<p>Again, this proposal is based on a boundary/footprint expansion that is unnecessary for this need, which could be achieved within the existing footprint and boundaries. (Please see our Alternatives below.)</p> <p>Snow King Mountain Resort has terrain within their existing footprint</p>

<p>resort in Jackson, WY to introduce and recruit new skiers to the sport.</p>	<p>that could be improved to meet this need without having to expand boundaries and develop on the backside of the mountain in winter wildlife habitat. Additionally, the proposed new ski runs to accommodate beginner and intermediate skiers are not well suited for that skill level. Beginner ski runs should be short, easily repeatable runs close to base facilities. Positioning beginner and intermediate ski runs on the backside of the mountain, far away from emergency and base facilities, and calling a road the main beginner ski run should not be considered ahead of developing beginner ski terrain towards the base on the existing footprint.</p>
<p>Expand snowmaking on the mountain to enable an early November opening for ski race training, provide coverage to the upper mountain, and aid in fire prevention.</p>	<p>Expanded snowmaking requires more analysis before being accepted as a valid “need.” Snow King is a relatively low-elevation resort that sees milder temperatures in the early winter season.</p> <p>Expanded snowmaking is unnecessary for ski race training, because racing is on the already-snowmaking-covered Cougar Lift. The locations of new proposed snowmaking seemingly go beyond locations that are suitable for ski race training. Expanding snowmaking on the backside doesn’t help with ski racing.</p> <p>Expanded snowmaking coverage on the upper mountain may be unnecessary, as the upper mountain often receives snow while the lower mountain receives rain.</p> <p>Also, please consult with Jackson Ranger District fire managers to best understand how and if new snowmaking capabilities on the mountain would actually result in more effective fire prevention.</p>
<p>Introduce high-quality guest service facilities to attract and retain local and destination skiers, serve as an event venue, and provide an outdoor education center for Jackson residents and visitors.</p>	<p>This need can be accomplished without footprint / boundary expansion. Also, this must be balanced against the negative impacts to our quality of life – key to the purpose.</p>
<p>Provide access to a wide range of year-round activities catering to a variety of visitors passing through the Town of Jackson.</p>	<p>This need can also be accomplished without footprint / boundary expansion and should be balanced against negative impacts to our quality of life.</p> <p>In order to substantiate this need, Snow King managers need to provide <i>updated</i> future projections for the amount of visitors they anticipate attracting, in contrast with the out-of-date projections in the 2017 Master Development Plan (MDP).</p>

	<p>Our community should not be tasked with supporting a project that will negatively impact our traffic, housing crisis, access to public lands, wildlife habitat, and quality of life without fully understanding the number of visitors that are needed on an annual basis to support Snow King’s operations.</p>
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Impacts on our community

The proposed on-mountain development stands to have a significant impact on our community. As we heard throughout the stakeholder group, public meetings, and meetings with our elected representatives, many locals are concerned about continued affordability for the community, visual and noise impacts, loss of our longstanding access to our public land, impacts from increased visitor use, social and economic impacts, and the role that expanded development on Snow King will play in regard to cumulative development throughout our valley.

Continued affordability

Throughout the years, and especially in the past few years, our community has been impacted by steadily increasing prices for activities on Snow King. For example, in the 2017-2018 winter season, after over 80 years of free uphill access to our Town Hill, Snow King management began charging substantial fees for uphill skinning, and faced significant public backlash. We fear that new development will result in continued increases to fees for developed and human-powered recreation, which will make our Town Hill less affordable and accessible for the local community. To fully understand the financial impact the proposed development may have on community members, it is essential for the Draft EIS to include past price changes in lift and season tickets (e.g. ticket and pass price increases over the past 10 years), prices of current summer activities, the rates asked of local non-profits operating programs on the mountain (like how much the Jackson Hole Ski and Snowboard Club and the Doug Coombs Foundation pay for lift tickets, rentals, lessons, etc.), and ticket price projections for all planned future activities. Just because Snow King tickets remain less expensive than other resorts in the area does not mean they will remain affordable to our whole community.

Noise and visual impacts

Snow King sits at the center of our town. As you arrive in Jackson from the north or west, it is nearly impossible to ignore the mountain. As community members, it provides the backdrop for our backyards, the People’s Market, summer concert series, gateway to our national forest lands, and children’s ball games in the park. To allow a new road, a gondola, a zip-line, mountain bike trails throughout the face, and a massive restaurant development at the top would greatly diminish the scenic resource at the heart of our community.



Artist's rendering of what Snow King would look like with the proposed roadcut and trails

The proposed increase in ridgetop winter nighttime lighting will not only increase light pollution in the town and the currently undeveloped Leeks Canyon but would also hurt our dark skies and the proposed observatory. The infrastructure development proposed does not promote quiet recreation, and instead will likely increase the burden of noise on the residents of the town. Many town residents spoke out last year against increasing the hours of operation for the winter SnoCross event, as they felt the public burden (noise impacts etc) outweighed public benefits. During the Snow King development public meeting process, it was clear that the community does not want a noisy zipline on our Town Hill. Again, to understand the full impact of this development, we need updated user number projections.

Free access to our public lands

In Jackson Hole, we are surrounded by 97% public lands and count ourselves lucky to have relatively easy and cost-free access to the Bridger-Teton National Forest. As mentioned above, in the 2017-2018 winter season, our access was limited due to an imposed fee for uphill travel – a “taking” of traditional public land access. As we heard throughout the community engagement process, residents are concerned about these fees on uphill winter travel – and are afraid that Snow King may charge fees for summer recreation as well. Please require that Snow King stop charging for human-powered travel.

Additionally, please give serious consideration to the types of access that will be facilitated by the proposal. For example, the terrain on the face of the mountain is seemingly only suitable for experienced mountain bike riders, and hikers will be funneled into either a steep staircase or a heavily switchbacked hiking trail. At the base, we may lose part of a town park to become a zipline landing and tour bus drop-off zone. We are concerned about losing historic access to Forest (and town) lands and being forced to “pay to play” – if we can afford it.

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Social and economic impacts

Additional amenities on our Town Hill will likely increase use by out-of-town visitors. The proposal could lead to Snow King becoming a large summer amusement park where our Town Hill is covered in roller coasters, top-to-bottom noisy ziplines, and a massive restaurant complex on the narrow ridgetop, making our summer gridlock even worse. Prior to any approval of on-mountain attractions, Snow King developers should be required to produce a detailed plan to deal with extra traffic and parking issues created by their development, as well as employee housing that is in line with our Town requirements. Please require that Snow King commit in legally-binding documents to fully mitigate all impacts *before* getting approval to build any new projects.

Please analyze these and similar key questions:

- How many skier days does Snow King host today – and how many will it host after boundary, trail, and lift expansion?
- How many people ride the Summit lift now and how many people do they expect to ride the new gondola – in winter and in summer?
- How many people do they expect to ride the zipline, every day, and total?
- How many employees does Snow King have now – vs. after building all these projects? And how will they mitigate housing for existing and new employees?
- How much parking does Snow King use now – vs. after building these projects? How many new parking spots will this development require, and where will they put those spots?
- How much more impact will there be on utilities – water, sewer, garbage, etc.? And who will pay for the necessary upgrades to town infrastructure?

Cumulative impacts of development

The Snow King Mountain Resort development cannot be looked at as a stand-alone proposal. Our town and valley face many growth challenges that should be looked at holistically. Staff conducting the EIS must work in close conjunction with the cooperating agencies of the Town of Jackson and Teton County to fully understand the biological and socioeconomic cumulative impacts that this proposal has when considered with other future potential development across the town and valley.

Impact on our Comprehensive Plan and Land Development Regulations

Our 2012 Comprehensive Plan (Comp Plan)¹ gives clear direction: “Preserve and protect the area’s ecosystem in order to ensure a healthy environment, community and economy for current and future generations.” One relevant policy is that “existing Planned Resorts should be limited to their existing footprint” (Policy 3.1.d). The proposed on-mountain development, in conjunction with development of parcels at the base, clearly contradicts our Comprehensive Plan directive to protect our ecosystem.

¹ Jackson, Teton County Comprehensive Plan. 2012.

<http://www.tetonwyo.org/DocumentCenter/View/1837/JacksonTeton-County-Comprehensive-Plan-April-6-2012-PDF?bidId=>

Our current Land Development Regulations (LDRs) have many relevant points as well. Under Planned Resort Zones (4.3.1) we read that “The intent of this development type is to...”

4.3.1.A.1. Encourage recreational activities that rely on indigenous natural attributes of the area, contribute to the community’s character and economy and have a long-standing, beneficial role in the community

→ *Ziplines can be built anywhere, go against our community character, do not have a long-standing or beneficial role – and are opposed by a large segment of our community.*

4.3.1.A.6. Ensure resort plans are consistent with the Comprehensive Plan, and therefore, are beneficial to the community

→ *Elements of the proposed development go against the direction set by the Comprehensive Plan. Specifically, see Comp Plan 3.1.d: “should be limited to their existing footprint” above. Development into wildlife habitat goes against the Comp Plan’s vision to “protect and preserve the area’s ecosystem.”*

4.3.1.A.7. Enable long-range planning for infrastructure, capital facilities, and community land use patterns by establishing a level of predictability in the maximum potential size and character of each resort area

→ *The current investors want to remove the predictability we have had for decades by drastically changing the size and character of this resort area.*

4.3.1.A.8. Ensure a balance is maintained between tourism and community that promotes social diversity but does not cause undesired shifts away from rural, western community character

→ *This proposal will mark a clear end to “Jackson Hole, Last of the Old West.” Ziplines, downhill bike parks, and massive buildings on top of Josie’s Ridge are widely undesired and clearly not “rural, western community character.”*

4.3.1.A.9. Produce resort plans that make significant contributions toward protecting attributes of the community that are considered critical to the community’s long-term health, welfare, and well being

→ *This new plan will harm our community by destroying wildlife habitat – directly contradicting our core Comprehensive Plan goal to “protect and preserve the area’s ecosystem.”*

Impacts on our wildlife and natural resources

The Snow King area is unique. It is uncommon to have important wildlife habitat so incredibly proximate to a populated area such as the Town of Jackson. From the perspective of town, looking at the Snow King ridgeline, this area is just the edge of town. However, from a larger landscape perspective, this area is the edge of a vast piece of undeveloped forest land stretching the length of Teton County and beyond from the Gros Ventre Range to the Wind River Range. Many wildlife species use this expanse of land to travel through the landscape and to skirt the edge of human development.

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Footprint expansion and wildlife habitat & connectivity

The proposed expansion in land use is an approximately 250% increase from the current use footprint of 191 acres. In size alone, this footprint expansion of the resort use area is significant. A footprint increase such as this must be done in the most thoughtful and careful manner to avoid and minimize potentially significant impacts to wildlife and their habitats. Increased human activity expanding over the ridge to the south-facing slopes of the “backside” as well as onto steep, conifer covered slopes to the east and west represent the insertion of human use at potentially significant numbers and high speeds into areas that currently have no or limited use by humans throughout the year.

Impacts on big game and predator species

Big game species moving from north to south pass through and along this ridge while some will stay to utilize the winter and summer habitats present along this ridgeline area. In the wintertime, reports of bears and mountain lions are common; mule deer and elk have been known to frequent south-facing, undisturbed areas such as the backside expansion area; and in the past few years wintering big horn sheep have been reported in the upper reaches of Leeks Canyon. The backside slopes represent similar habitat to that found on the southern end of East Gros Ventre Butte – an area of ungulate winter range that is negatively impacted by proximate human use.

- What will be the impacts to these big game, non-game and predator species, from habitat fragmentation and habitat alteration – in each expansion area and cumulatively?
- Are there big game and non-game species parturition / calving areas nearby? How will proposed activities be managed to protect these critical areas?
- What Forest and State sensitive species and federally-listed species may be impacted by the proposed activities?
- What are the possible human-wildlife incidents that may occur from increased human use – in each area as well as overall?
- What habitat impacts will result from the expansion of facilities and infrastructure? Will these impacts carry with them mitigation requirements?
- Are the stated needs for the proposed expansion areas based solely on needs related to snow sports? Could these stated needs be achieved within the current footprint?

Impacts on birds

In addition to big game, many bird species from raptors to songbirds are known to nest in the north-facing conifer slopes as well as the south-facing sagebrush and forested habitats of the proposed expansion areas. Raptor and songbird species are both sensitive to human use disturbances during the nesting seasons within their home ranges. As highlighted in the *State of Wildlife Report* (attached), these intact conifer forest areas are part of a larger ecological system as well. For instance, songbird species that nest in the conifers often stage lower down in Karns Meadow in late spring before moving up into the conifer forests to nest. Therefore, a disturbance within the conifer habitat along the hillside will also have implications stretching to other areas in the valley.

- What effects are expected on avian species and their habitats from area expansion, proposed infrastructure, increased human use, habitat fragmentation and/or habitat alteration?

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- How will Northern Goshawk nests (a BTNF Sensitive Species) be protected from human activity disturbances within 100m (Squires and Kennedy, 2006) of their nest site as well as within the territorial foraging area?
- How will raptor species in addition to the Northern Goshawk and their nesting habitats be protected from impacts?

Impacts of habitat alteration

Thinning and clearing both have detrimental effects on wildlife species, and effects are species-specific. We are interested to see species-specific analyses for all habitat alteration methods (e.g. mowing, grading, clearing, thinning, glading, understory removal and alteration). Additionally, the increase in or addition of snowmaking in areas will potentially alter the water regime in those areas. The proposed snowmaking could affect water regimes on both the north-facing slopes as well as the south-facing, both of which are a component of the Flat Creek watershed. Particularly with the south-facing slopes, adding additional water into these ecological systems could have an effect of altering the vegetation type and species composition found there.

- What are the effects of each habitat alteration method (e.g. mowing, grading, clearing, thinning, glading, understory removal and alteration) and resulting use on each species affected within that habitat?
- What are the effects of grading to water resources and how will these be minimized?
- What are the effects of possible changes in water regimes resulting from snowmaking in affected habitats (e.g. sagebrush, juniper, deciduous forest and coniferous forests)? Will these vegetation types and their species composition change?

Finally, we understand from public statements that Snow King may ask future permission to drill a well to supply water for snowmaking – but that it is not currently part of this analysis. Please include potential well sites and their impacts in this Environmental Impact Statement.

Human-wildlife conflicts

An increase in human use – particularly at high speeds – will likely increase human-wildlife interactions and incidents. We are interested to know what the projected carrying capacity on the mountain will be once all infrastructure is in place.

- What levels of human use are expected and how do these numbers compare with current use? (See specific questions above re: community impact.)
- What are the likely impacts to wildlife and the ecological system specifically from this increase in human use?
- Do the proposed uses exceed a threshold between acceptable and harmful use? Where is that threshold?

Cumulative impacts of development

We would like to see full environmental analysis of not only the project components on their own but also of the cumulative effects if some or all of the project components are implemented. For example, what will the cumulative impact be for wildlife if Snow King expands its boundaries and develops into critical habitat on the backside, and at the same time, the important winter moose and deer habitat in Karns Meadow is developed with a lighted ski trail, as is

currently within the written easement for the meadow. As we detail below, there should be an alternative that specifically prioritizes minimizing impacts to wildlife, habitat, and natural resources.

Concerns regarding specific project components

In addition to our concerns with the impact on our community and wildlife from the proposed projects, we have the following concerns about the coherence of specific components:

Beginner and intermediate skiing and safety

The developers' proposal to put beginners and youth on the ridgetop and backside seems like a significant safety hazard. The ridgetop is high-elevation and often windy and stormy through the winter season. Putting youth halfway down Leeks Canyon is also a bad idea: in the event of the backside lift closing, they would be stuck in a different drainage without facilities. The developers' insistence that they need a top-to-bottom road to serve as a beginner "ski run" to get beginners safely down the mountain shows that they should not be, and do not need to be, putting beginners on top of the mountain in the first place. This road would *also* put beginners in harm's way during the whole traverse down (sliding off the edge; collisions with skiers skiing or sliding out of control down steep intersecting trails). To put safety first, please develop an alternative that keeps new beginner runs and facilities on the frontside, near the base of the existing infrastructure.

It is important to note that the management leading this proposal was responsible for opening the resort on a dangerous day in 2017, which led to beginner skiers being in harm's way during an in-bounds avalanche². Please conduct a thorough investigation with current and former ski patrollers and leaders to determine whether management appropriately listened to ski patrol safety concerns on that day. After investigating, please determine whether the Forest Service should implement additional safety oversight over Snow King management through any new approvals, potentially including elevating the authority of ski patrol over office management.

Boundary and footprint expansions

From the perspective of the purpose and need, the developers are proposing an unnecessary expansion to the east onto terrain similar to the already open steep, north-facing, uncrowded and underutilized resort terrain. Additionally, they are proposing an expansion to the west, far onto Josie's Ridge and very near winter seasonal closures. An expansion would disturb habitat close to critical winter range that is closed to all human use. If we can't walk out there, why allow more disturbance near it with skiing and a road?

A new lift on the backside would greatly increase encroachment and use in a drainage that is currently unused except by wildlife. South-side terrain is sunny and windswept, which results in more available forage for wildlife like mule deer, and causes difficulty maintaining desirable, skiable snow conditions and depths. Opening the backside for skiing would require increased

² "Slide closes Snow King," February 11, 2017, *Jackson Hole News & Guide*.
https://www.jhnewsandguide.com/jackson_hole_daily/local/article_c2e4babd-8885-5cb5-be42-eea081fe4924.html

snowmaking, a potentially significant financial responsibility and a strain on our water supply.

In addition to the objectives stated in the Comprehensive Plan, the Bridger-Teton National Forest Plan outlines relevant goals and objectives to maintain wildlife habitat in balance with recreational development:

Forest Challenge: Avoid Unacceptable Effects from Recreation Use. Overuse by recreationists and the existence of too many trails on the Bridger-Teton National Forest can reduce trail and recreational experience, and soil and water qualities. The challenge is to manage the pattern of use and the available trails and facilities to prevent problems with human health and safety or the loss of basic resource values. If the challenge is not met, the experiences people seek may disappear and the potential for human injury or illness increase.

Goal 2.1: Adequate habitat for wildlife, fish, and edible vegetation to help meet human food needs is preserved.

Objective: Provide suitable and adequate habitat to support the game and fish populations established by the Wyoming Game and Fish Department, as agreed to by the Forest Service

Goal 4.1: a) Road management preserves wildlife security, soil, visual resource, and water quality values. b) minimize new road building and downgrade or close existing roads and motorized access trails to maintain or increase wildlife security. c) Design roads and structures to retain soil, visual resource, and water-quality values.

We believe that the proposed road, boundary, and footprint expansions are in opposition to the Forest goals and our community goals.

New road

The proposed new front-side road is unnecessary and damages our ski hill. We refer to excellent comments by Rod Newcomb in the *Jackson Hole News&Guide*:

As a Snow King patroller in the early 1960s, retired mountain guide and avalanche instructor, my concerns are about the road.

First, what will the proposed road do to the quality of skiing? The road enters the forest boundary east of the Rafferty lift and traverses to the east with a grade of 7 to 8 percent and a width of 16 feet. After a switchback to the west it traverses under the top terminal of the Rafferty lift and continues across the Grizzly Run, then the Elk Run to the Bearcat Run. From there to Scotty's Ridge it crosses slope angles of 35 degrees.

Near the top of Scotty's the proposed run turns back east and ends at the top of the present Summit lift. Total length is approximately 1.4 miles. This 16-foot-wide road crosses Elk Run, 100 feet slope distance above where the Karns Traverse enters Elk. At this point Elk has a slope angle of 30 degrees. For a horizontal road 16 feet wide on a 30-

degree slope, there is a 6-foot road cut that skiers would need to negotiate about halfway from the top of Elk Run to Old Man's Flats.

Intermediate to expert skiers prefer long uninterrupted runs. Elk Run is the mountain's best run and should not be interrupted by a 16-foot-wide road.

The second issue regarding the front-side road is personal for many folks and can be difficult for developers to understand. Many hikers (the King has said up to 500 a day) consider the forest beyond the boundary an extension of Phil Baux Park. They want the front-side roads left as they are and no more disturbance than necessary for the proposed expansion.

Impact on existing local agreements regarding Snow King

The proposed action has a significant impact on existing agreements with the cooperating agency Town of Jackson.

In 2000, the town made a deal with Snow King to allow dramatically more commercial and lodging development at the base – 915,000 square feet (sf), the equivalent of almost 10 of the new Marriott hotel or 20 of the new ballpark condos – in exchange for that development serving as the “financial and operational platform” for the ski area. Essentially, local government created many millions of dollars of commercial property value through an upzone, and gave it to the investors. In total, that development equates to 550 new condos or 1100 new hotel rooms – about half of it still latent. Nearby condos are currently selling for \$1.5-2 million, so 550 condos means \$800 million to a billion dollars of condo revenue.

A small portion of that revenue was supposed to support the winter skiing operations. The investors agreed to use some of the additional revenues from the increased lodging and commercial development to fund “community-oriented activities” like operating the ski area. The Resort Master Plan was clear on how this would work:

“The Snow King ski area provides a venue for the junior ski racing programs, adult ski racing as well as recreational skiing and snowboarding, both day and night. ... It must be noted that many of our community partnership activities mentioned above often come at a high cost to Snow King. Resort operation of lodging and other facilities provides the financial and operational platform and the resources to support these and other community-oriented activities.” (page 172-173)³

The investors want to remove their responsibilities from that deal with the Town, and instead set up a new deal in which high-impact on-mountain developments like a zipline serve as the “financial platform” for the mountain. However, they want to keep the remaining 500,000 sf of commercial development they received from the Town in 2000. We believe that the investors should not get to keep the benefits from that deal *and* build new development with negative impacts on USFS land.

³ Snow King Planned Resort Master Plan, 2000.

<https://www.jacksonwy.gov/DocumentCenter/View/435/Snow-King-Master-Plan-PDF>

We believe the whole community should be allowed to negotiate a new and comprehensive deal, and to hold the investors accountable to existing agreements. Please analyze the connection between Forest approvals and the 2000 Town agreement. *Please see our attached comments to the Town Planning Commission for further detail and evidence on this subject.*

Alternatives

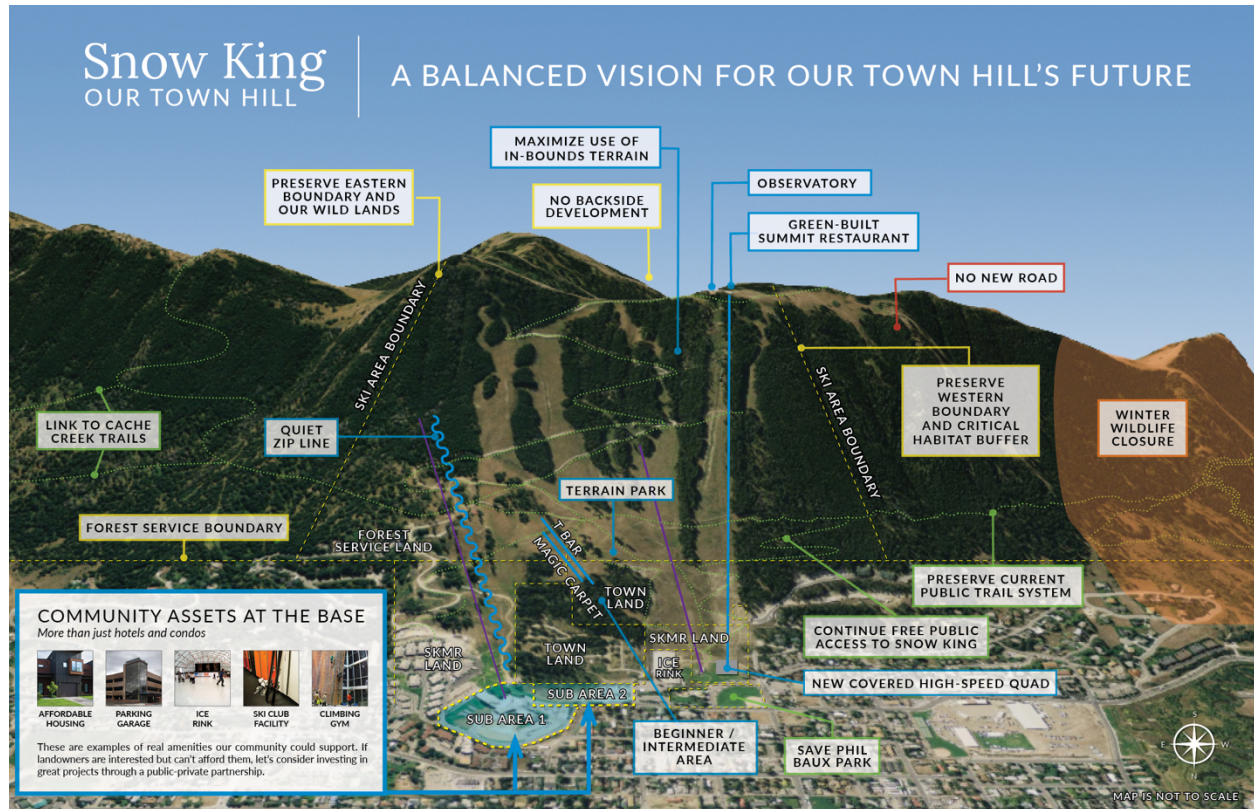
In addition to the project proposal and the no action alternative, we request you analyze the following two alternatives:

1. **Balanced vision alternative:** We worked in coordination with community members to develop alternative improvements and development within the existing footprint that achieve the Purpose and Need without expanding into valuable wildlife habitat and sacrificing important aspects of our community character.
2. **Wildlife alternative:** Snow King Mountain is home to valuable wildlife habitat that should be considered at a high level when analyzing alternatives to the proposed project. A wildlife-friendly alternative would prioritize protecting wildlife and *improving* wildlife habitat and connectivity. It should include no boundary expansion, no development on the backside, no yurt or chairlift on the backside, recreation development that is sensitive to wildlife, and new closures for critical wildlife habitat.

Balanced vision alternative

Below, we detail a balanced alternative proposal for our Town Hill. We worked with a diverse group of community members—developers, elected representatives, planners, former National Forest staff, neighbors, skiers, snowboarders, hikers, naturalists, young and old—to develop a plan that achieves the purpose and need without expanding boundaries into wildlife habitat.

We also attended all stakeholder and public meetings convened by Snow King and the Town of Jackson and incorporated community input into our initial balanced vision. We believe this alternative better encompasses the outcomes of those community conversations, and we believe that Snow King can succeed with responsible development like this.



Snow King Summit and Ridgetop

Observatory

An observatory would be a unique educational opportunity for the community and a great offering to visitors, connecting people with the natural world. Other summit development should not create light pollution preventing dark skies for the observatory. The observatory would provide new, unique educational opportunities for our community while at the same time promoting our community values. The development footprint should be in the existing developed area.

Green-built summit restaurant that maintains affordability for the community

A new summit restaurant could create a quality and welcoming gathering place for locals and visitors. It should be built within or close to the existing Panorama House footprint, with minimal visual and environmental impact, no “skylining” and no light pollution. We do not need a massive 20,000 sf complex with the associated infrastructure and impacts. Any and all increased traffic and parking demand created by the restaurant should be mitigated by Snow King with a community-approved plan. Please research other resorts with sustainably-built buildings and use them to guide building practices. It should be a national model of “green” design and building. Finally, in order for this to be a “community benefit” as advertised by the developers, it must be affordable to our full range of community members – not just visitors and wealthier locals.

On-Mountain

Covered, high-speed quad

We encourage replacing the Summit Lift with a covered high-speed quad chairlift, in the current

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location of the Summit Lift. The current lift is slow, old, and should be replaced by a new and faster high-speed quad. A covered lift will provide more comfortable transportation on rainy, snowy, or frigid days. Replacing the current lift with a gondola could require more development to recoup the investment. By replacing the lift with a less expensive covered quad, development can be limited to the existing footprint.

Quiet zipline

New ziplines, if allowed, should be limited to the Rafferty Lift area where there is already considerable activity such as the Cowboy Coaster; and should incorporate state-of-the-art noise-cancelling technology so that constant screaming doesn't disrupt wildlife and people. Our community has voiced significant concern over the proposed zipline and its impact. With noise-cancelling technology, Snow King could potentially build a zipline that will keep the current public trail system in its peaceful state for quiet hikes and bike rides. This will also keep local restaurants and businesses from being impacted from constant noise on the mountain during the daytime.

Maximize use of in-bounds terrain

Enhance and maximize all of Snow King's existing in-bounds permitted terrain with removal of downfall, selective thinning and potentially cut new narrow trails that will not impact the historical view, or require avalanche mitigation and snowmaking. Use natural topography features such as ravines and small ridges to improve fall-line top to bottom ski runs. Snow King has plenty of terrain within their current footprint that is suitable for upgrades and would allow for more runs suitable for beginners and intermediates. Maximizing in-bound terrain should be considered prior to any development outside of the current footprint.

Beginner/intermediate area

The Rafferty area is a great location for beginner and intermediate skiers and doesn't need to expand the footprint onto new terrain. A new magic carpet and T-bar to the west of the Rafferty lift would safely welcome beginners, without the impacts of expanding the footprint into new areas. This new beginner area terrain development would keep Snow King from having unnecessary boundary expansion and snowmaking. It would also provide new opportunities for beginner skiers and snowboarders. Finally, it would avoid the dangerous situation of putting beginners and youth on a high-elevation windswept stormy ridge, or halfway down Leeks Canyon (in the event of lifts closing, they're stuck) – as the developer has proposed doing.

Terrain park

Expand terrain park on suitable grades including Rafferty and the current Old Man's Flats location. Create more features for beginners and intermediates, and provide the opportunity to link terrain parks and isolated features with berms/wiggles. Build a halfpipe for all abilities. Construct wooden terrain features on appropriate areas of the mountain. Our community is lucky to have access to world-class resort and backcountry skiing. However, there are limited opportunities for riders that want to test their abilities in a terrain park. Improving the existing footprint with an updated terrain park would give Snow King a feature separate from other local resorts and would increase access for the terrain park demographic.

Public access

Preserve current, free and unfettered public trail system, in perpetuity

An important and fundamental part of the Town Hill is the public trail system we all use. The current trail system is an integral part of the larger Cache Creek trail system and is used extensively in summer and winter, night and day. The public should have the unfettered legal right to use Snow King land as we always have. Almost 90% of the Snow King ski area sits on public land, owned by the Town of Jackson or the Forest Service. We should not have to pay to do human-powered recreation on our own public lands, and these historic recreation uses should never be prohibited.

Part of new development should be an agreement that ensures human-powered public access rights forever. We should all be free to walk dogs, trail run, hike, mountain bike, skin or hike uphill, and enjoy the mountain with our families and friends regardless of income. This public right should be written into Snow King's future permit and lease agreements.

Link to Cache Creek trail system

The eastern boundary is a quick transition from the developed Snow King Mountain Resort to the untouched beauty and wild area of the Cache Creek trail system. We support maintaining free public access across Snow King to the trails in Cache Creek.

Boundaries and Footprint

No backside development

Snow King should improve existing terrain (see above) instead of increasing the resort operating footprint on the back (south) side of the mountain.

Preserve Western boundary and critical habitat buffer

Snow King should improve existing terrain within the current boundaries instead of increasing the resort operating boundaries to the west – far onto Josie's Ridge and very near winter seasonal closures.

Use backside road

Snow King or the Town of Jackson should arrange for an easement providing perpetual access via the Leeks Canyon Road. The Leeks Canyon Road is safe to use and all options should be exhausted before a new road is built on the front side of the mountain, necessitating boundary expansion. Again, from Rod Newcomb's letter to the *Jackson Hole News&Guide*:

There is an alternative. That is the back-side road, in use since sometime after 1945, that was used to install the top terminal of the first Summit lift and supply fuel to the lift's diesel engine. The road is currently used by the folks who operate the cell towers at the top of the mountain.

It has a grade of 11 to 12 percent, is wide enough for trucks and has no switchbacks. It begins from the highway south of High School Road, crosses 1,000 feet of Lockhart land and continues up Leeks Canyon 2.4 miles to the summit. It is listed on the 1996 quad as a 4-wheel-drive road. There is a short stretch of 14 percent grade. It needs work, such as

culverts and gravel, to be used for heavy construction vehicles. The Lockhart family has indicated a willingness to negotiate access with Snow King.

Snow King is against the back-side road because it would require improvements, negotiation with the Lockharts and driving from Snow King's base to the entrance of Leeks Canyon. But this compromise would save the best ski run on the mountain.

Preserve eastern boundary and our wildlands

The eastern boundary of Snow King has an incredible and diverse concentration of wildlife right next to town. Jackson has the rare privilege of an intact ecosystem and as stated in our Comprehensive Plan, we are responsible for “preserving and protecting our area’s ecosystem” from unnecessary development.

Wildlife alternative

In addition to the above “Balanced Vision” alternative, please include an alternative that prioritizes and protects the wildlife and wildlife habitat on Snow King. As mentioned, Snow King mountain contains vital habitat and movement areas for both mammal and avian species and their food sources. Please develop a wildlife-specific alternative, utilizing all available data sources. This proposal should include no boundary expansion, no development on the backside, recreation development that is sensitive to wildlife, and new closures for critical wildlife habitat.

Please consider whether the existing winter closure on Josie’s Ridge should be expanded closer to the resort, whether there should be a winter closure on the south side, and whether additional closures are warranted in the Skyline area. Also, please remove the existing permit boundary from the backside to prevent future development, and only allow development within the current footprint. This alternative could outline a way to actually *improve* wildlife habitat and connectivity – in addition to various alternatives showing different levels of degradation.

Several excellent local data sources exist that may help inform wildlife use of the project area. Please consult datasets generated through Nature Mapping Jackson Hole, Wyoming Game and Fish Department, USFS, Western Migration Initiative and the National Elk Refuge for observational and movement wildlife data.

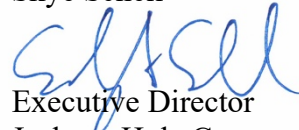
Mitigation

All alternatives should also include measures for mitigation, using other resorts for guidance of best practices. Multiple mitigation strategies should be considered and analyzed. Examples include securing off-site land easements, funding restoration and conservation efforts across the valley, or, every acre of new development could be mitigated by taking away two acres from another part of the permit area. With this letter, we have included examples of other ski resort mitigation efforts as well as a peer-reviewed article detailing mitigation standards for ski resort development. Please review these and other research as you consider necessary mitigation for development.

Thank you for the opportunity to comment on this proposal. We look forward to working with the Forest Service, Snow King Mountain Resort, and the entire community to ensure that we continue to live and recreate in balance with nature and our community values.

If you have any questions, please do not hesitate to contact us.

Skye Schell



Executive Director
Jackson Hole Conservation Alliance

Leah Zamesnik



Conservation Policy Manager

Appendix A: The community engagement process and proposal development

Since January, the Alliance and our members were actively involved in the Town’s public engagement process. We looked forward to developing a comprehensive proposal that truly reflected the community’s desires. Unfortunately, after two public meetings and months of hard work by a stakeholder group, the developers submitted a proposal that is in contrast with ideas put forth by the community and stakeholders.

At the Town’s public meeting in January, when the facilitator asked for community members’ real opinions, our staff watched as a Snow King employee at our table read aloud from a 3-page “supporter talking points” sheet, apparently prepared by their PR firm. This is not authentic community engagement.

Next, the developers tried to push their proposal through the Town’s stakeholder group, which was supposed to come up with a series of balanced compromises. Instead, Snow King’s manager argued for each aspect of their existing proposal, and at the end tried to get their entire original proposal included as a scenario. The stakeholders did not allow that.

The stakeholders did include some projects that were totally rejected by the majority of people at the public meetings – like landing the gondola in the town ballpark. (*Please see our summary and tally of community input from the second community meeting, below.*) But the stakeholders didn’t go as far as the developers proposed. The stakeholders didn’t support ziplines, or a massive boundary expansion. They limited boundary expansions, when allowed at all, to the new road itself. As the stakeholder facilitator wrote:

Among the more challenging issues [sic] that the group addressed were boundary expansion, road development, and zipline... The group explored several ideas and options related to gains for Snow King and for the community but did not agree on or converge on a particular outcome.⁴

The applicant ignored the stakeholders and essentially submitted their original massive proposals: a massive boundary expansion and roadcut east and west; a huge footprint expansion onto the backside; a tour bus and zipline landing zone in our town ballpark; a top-to-bottom zipline; and (to the Town) additional condos at the base.

⁴ Town Council workshop agenda packet, May 21, 2018. Page 122.
<https://www.jacksonwy.gov/AgendaCenter/ViewFile/Agenda/05212018-339>

Tally & Summary of Community Input at Second Public Meeting, March 2018

Gondola: the majority said don't land it in the ballpark – leave it where the current summit lift is

- A - Ballpark - 124
- B - Current location - 135
- Other - 5, N/A - 24

Ice Rink: the majority are happy with an ice rink expansion

- A - Move somewhere else - 87
- B - expand to east - 132
- C - expand to west - 22
- Other - 14, N/A - 33

Mountain Sports Center: the majority are happy with a mountain sports center. There wasn't a real range of options.

- A - take over ice rink (if moved) - 93
- B - include in ice rink expansion - 145
- Other - 3, N/A - 47

West Portal: this was controversial. A slight majority of this group was OK with charging for public uphill access in winter

- A - unlimited summer / managed winter - 143
- B - unlimited summer and winter - 125
- Other - 2, N/A - 18

Zipline: the vast majority (at least 180) rejected the proposal to put a zipline next to the summit lift / gondola. This is Snow King's least popular / most disliked proposal.

- A - by gondola - 82
- B - by Rafferty - 70
- C - no zipline - 110
- Other - 11, N/A - 15

Boundary expansion / road: this question was posed in a very complex and confusing way. About half of people were OK with Snow King's proposal, and half wanted to scale it back.

- A - boundary & road as SK wants - 129
- B - just new frontside road - 24
- C - just new frontside road to the west (none to the east) - 10
- D - no expansion - 74
- E - just new frontside road to the east (none to the west) - 12
- Other - 11, N/A - 28

Summit: the majority of people were OK with beginner skiing on summit, but that doesn't mean they're OK with everything that might have to come with it

- A - west summit beginner expansion - 166
- B - no change - 88

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

- Other - 4, N/A - 30

Back side: this was a very divisive issue. Slight majority OK with a new lift; slight minority prefer either only human-power on the back or actually removing the back side from the permit area entirely. Snow King ignored all those people and proposed everything they wanted from the start.

- A - human-powered & yurts - 67
- B - new lift etc. - 147
- C - pull back boundary to footprint - 51
- Other - 4, N/A - 19

Uphill access: slight majority of people who came to the meeting were OK with charging for uphill access (though hundreds of people who didn't make it to the meeting have signed a petition rejecting uphill fees)

- A - free - 123
- B - charge - 140
- Other - 3, N/A - 22

Housing: agreement that Snow King should do its part to house their employees, vs their previous tactics of putting 12 seasonal workers in one single-family home.

- A - new agreement - 146
- B - status quo - 34
- C - Town LDRs - 64
- Other - 3, N/A - 40

Appendix B: Documents accompanying comment letter for review

Along with our comment letter, you will find the following documents at this online shared folder, as they are too large to send over email:

https://jhca.sharepoint.com/:f:/g/ErasNfqo3jdIoWsnjB_Ay4sBO4xbkN8TSK8OmNTkNuQ2rQ?e=b1IU6

1. Relevant academic articles
 - a. Does artificial snow production affect soil and vegetation of ski pistes? A review (Rixen, Stoeckli & Ammann, 2003)
 - b. Watershed analysis of forest fragmentation by clearcuts and roads in a Wyoming forest (Tinker et al, 1997)
 - c. The impact of forest ski-pistes on diversity of ground-dwelling arthropods and small mammals in the Alps (Negro et al, 2009)
 - d. Ski tourism affects habitat use and evokes a physiological stress response in capercaillie *Tetrao urogallus*: a new methodological approach (Thiel et al, 2008)
 - e. Northern Goshawk ecology: an assessment of current knowledge and information needs for conservation and management (Squires & Kennedy, 2006)
 - f. Forest bird diversity and ski-runs: a case of negative edge effect (Laiolo and Roldando, 2004)
 - g. Impact of outdoor winter sports on the abundance of a key indicator species of alpine ecosystems (Patthey et al, 2008)
 - h. Effects of ski piste preparation on alpine vegetation (Wipf et al, 2005)
 - i. Not all ski slopes are created equal: Disturbance intensity affects ecosystem properties (Burt & Rice, 2009)
 - j. State of Wildlife in Jackson Hole (Clark & Riginos, 2018)
2. Examples of mitigation and resort development best practices
 - a. Ecological uncertainty, adaptation, and mitigation in the U.S. ski resort industry: managing resource dependence and institutional pressure (Tashman & Rivera, 2015)
 - b. Snowbird Record of Decision with mitigation standards (1999)
 - c. Heavenly Mountain Resort Mitigation and Monitoring Plan Annual Report (2009-2010)
 - d. Best practices guide: for resort development in British Columbia (2005)
3. Relevant letters from community members published in the Jackson Hole News and Guide
 - a. Noah Osnos Letter to the Editor (LTE) “What’s the impact?”
 - b. Glen Esnard LTE “The King is king”
 - c. Geneva Chong LTE “Dismissive language”
 - d. Kirk Davenport LTE “Irresistible urges”
 - e. Kyle Kissock LTE “Don’t budge ballfield”
 - f. Rod Newcomb LTE “Snow King wrong road”
 - g. Skye Schell Guest Shot “Let’s expand our vision of Snow King’s success”

- h. Sam Petri Guest Shot “Soaring Eagle hasn’t landed-yet”
 - i. Geneva Chong Guest Shot “Making Snow King a community gem”
 - j. Paul Hansen Common Ground column “Judging what’s right for us and Snow King”
4. Alliance letter submitted to Jackson Town Planning Commission, September 18, 2018