

June 1, 2020
Town Planning Commission



RE: Follow-up comments re: Snow King zip line / gondola permit

Dear Chair Vandenberg and Planning Commissioners,

Thank you for your thoughtful discussion of the Conditional Use Permits for Snow King's proposed zip line, gondola, and other amusements. We would like to provide our feedback on your discussion – a rare opportunity since in many cases we only have one chance to provide public comment and can't respond to or correct inaccurate statements by applicants.

First, please take the time to consider the Parks and Recreation Board input. We were impressed by their thorough discussion and clear decisions, and we hope you will grant them full consideration. We support their recommendation to limit gondola operating hours to 6pm in winter and 9pm in summer (lining up with other activities), vs. our previous recommendation of 8pm. We still believe that loud amusements that impact the base area *should* have 8pm summer closing times.

Safety *is* an issue for zip lines

We need to push back against the applicant's assertion during your last meeting that "there have been very few accidents in the United States on the very many zip lines" and that safety measures have taken a "massive leap." There's no central repository for injury data (or for participation numbers) but we do know that injuries grew from a few hundred in the late 1990s to more than 3,000 in 2012.¹ We also know that zip line injuries can be serious, and the sport's injuries are deemed to be "at least as serious as rock climbing" and more in line with whitewater rafting than riding a rollercoaster. And we know zip lines are not treated like either of those but rather like carnival rides; regulations vary widely from state to state, with oversight limited to simple review of plans on paper. This is an unnecessary amusement ride with real safety risks. *Please recommend denial on the permit for the zip line.*

Please say no to summit bars and weddings till the middle of the night

Although the applicant frames the 25,000 sf summit complex and wedding venue as an "if," the Forest Service (FS) included them in every action alternative in the Draft Environmental Impact Statement (DEIS) – making it clear that approval is likely. Once those facilities are built, and once the Town Council sets operating hours for the gondola, there will be no way to regulate activity hours on the summit. Events will be on FS land, and not subject to special event permits from the town or county. We believe it is utterly inappropriate to have regular operations, lighting, and activity on

¹ Borrell, Brendan. (2017, Feb. 28). "Just how dangerous are zip lines?" *Outside*. <https://www.outsideonline.com/2159481/just-how-dangerous-are-ziplines>.

the top and front of Snow King until after midnight, and we are very surprised that the applicant wants summit activities to run as late as downtown bars. Please say no. *Please require all base area activities and the gondola to adhere to a strict 6pm winter / 9pm summer closing time, with **rare** exceptions for events (a few each year).*

Wildlife impacts are relevant

Several commissioners raised concerns about impacts to wildlife – thank you – and were told that the FS was fully vetting those impacts through their Environmental Impact Statement (EIS). Unfortunately, the FS completely failed in that impact analysis (please see [our Draft EIS comment letter](#)). Most notably, the FS ignores crucial winter range for mule deer and elk in Leeks Canyon, northern goshawk nests in the proposed expansion into Cache Creek, and lynx habitat where the applicant wants to put a yurt camp. The FS will decide what may be built outside the current operating footprint, but the restrictions you recommend for the gondola hours will determine the magnitude of those impacts. Late-night service with all the associated noise, lighting, and human wandering from the summit complex and a top-to-bottom zip line clearly increases the impacts on our wildlife. *Again, please deny the permit for the zip line and require a strict closing time for the gondola.*

Who's watching the water?

Although the applicant claims the resort doesn't plan to make "a vast amount of more snow," their plans for FS land indicate otherwise. The alternatives in the DEIS present a 150-163% increase in snowmaking (including on south-facing slopes), and they propose to open earlier in the year, when temperatures are warmer – amounting to the need for more and more water. Using initial data from Town Public Works (at the end of this letter), we've calculated that the demand in one month could be as great as 298.5M gallons of clean drinking water. We do not agree with the applicant's logic that because the "town has identified no impending water shortage" that there is no problem. We support ski racing, *and* we believe there should be an honest conversation about the impacts of snowmaking. *If the resort needs more water for snowmaking, not for a massive summit complex, then the town should negotiate an appropriate cost-share for installing larger conveyance pipes through the pump house CUP.*

The noise issue isn't new

Noise has long been an issue for Snow King's neighbors, and despite town LDRs calling for planned resorts to have a "high degree of self-containment" (4.3.1.A), the resort has not solved the issue. We have found nothing in the application to back the applicant's claim that noise estimates address cumulative concerns. While snowmaking may be louder than a zip line, the proposed zip lines and other amusements are much closer to neighbors and town. *Please deny adding more noise sources to the existing base area impacts, and please require strict 6pm winter / 8pm summer closing times for existing base area amusements.*

The big picture

Decisions about operating hours, zip lines, and water pipes may seem small, but they are key issues that have fallen through the cracks of different jurisdictions. We have to remember that this zip line and gondola are part of a larger picture for our Town Hill, one that includes 25,000 sf summit complexes, [top-to-bottom lighting](#) and zip lines, roads crisscrossing the best ski terrain, and bulldozers taking out important habitat of northern goshawks, great gray owls, elk, bear, cougars, wolves – and local recreationists. These CUP discussions aren't just about small design adjustments, moving a structure by a few feet here, a few feet there; *these discussions are about if these uses should be allowed at all, and if so, under what conditions.*

We want Snow King to succeed

We'd like to recognize the profound impact coronavirus is having on all of our local businesses. We want to find a way to help Snow King succeed despite the uncertainty of the coming seasons and years. But let's not hastily approve bad ideas. If the only way the resort's current investors can think of to save Snow King is to cover it with zip lines...maybe it's time for someone else to try. We've seen the community's willingness to consider a public buy-out before, and we saw the community rally around Snow King to fund grooming for uphill exercise this spring. In these times, we've all realized the importance of public spaces like Snow King. And just like with the Café Genevieve block, sometimes we have to say no to a bad idea to create space for a good outcome. *Please say no to these bad ideas so that we can all come together in support of better proposals for our Town Hill.*

Sincerely,



Brooke Sausser
Community Planning Manager

Email from Town Public Works

During the DEIS comment period, Assistant Public Works Director Johnny Ziem provided the below information:

Johnny Ziem <jziem@jacksonwy.gov>
to me ▾

Mar 12, 2020, 8:41 AM ☆ ↶ ⋮

Brooke,

There are two 6 inch meters that are used to make snow at Snow King. See gallons below with the respective months.

6" Meter #1		Gallons
	18-Nov	5,100,000
	18-Dec	4,100,000
	18-Jan	100,000
	19-Oct	100,000
	19-Nov	3,100,000
	19-Dec	7,200,000
6" Meter #2		
	18-Nov	5,200,000
	18-Dec	0
	18-Jan	113,400,000
	18-Feb	700,000
	19-Nov	6,600,000
	19-Dec	10,900,000
	20-Jan	3,700,000
	20-Feb	0

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

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