

October 24, 2019

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

Bridger-Teton National Forest – Heritage Program  
P.O. Box 1888  
Jackson, WY 83001  
Attn: John P. Schubert

Submitted via email: [comments-intermtn-bridger-teton-jackson@fs.fed.us](mailto:comments-intermtn-bridger-teton-jackson@fs.fed.us)

**Attention: “SKMR On-mountain Improvement” Projects & Historic Preservation**

Dear Ms. Moore and Mr. Schubert,

During the Teton County Historic Preservation Board (TCHPB) meeting on October 8, the board discussed the adverse impacts on historic and cultural resources of the proposed “Snow King Mountain Resort On-mountain Improvements,” as well as the request by the State Historic Preservation Office (SHPO) that they review these effects as determined in a number of reports. Though the two latest reports have not yet been finalized for public review, the Jackson Hole Conservation Alliance would like to express our own concerns based on previous historic research and be considered alongside those of the TCHPB and the SHPO. The concerns reflected in this letter supplement but do not replace our previous comments<sup>1</sup> in response to the project scoping letter in 2018.

At the Alliance, we protect not only the wildlife and wild places of Jackson Hole, but also its community character – of which Snow King is a fundamental anchor. We have four main areas of concern regarding impacts to historic resources: continued consideration of longstanding, if harder-to-define, community ties to Snow King; integrity of the core visual of the north face; integrity as it relates to development outside of the north face; and lack of specificity in proposals and concerns about cumulative impacts.

*Longstanding Community Connections*

Following Forest Service reports on the Snow King area dating as far back as 1981, the 2012 report by Mary Humstone<sup>2</sup> establishes Snow King’s eligibility for listing in the areas of community development and recreation, and more importantly, adopts a new cultural landscape approach. Humstone’s cultural landscape approach best captures the way in which Snow King has defined Jackson culture since the 1930s, citing community member testimony, such as: “My

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<sup>1</sup> Jackson Hole Conservation Alliance. “Scoping Comments for SKMR On-mountain Improvement Projects. (2018). Retrieved from [www.fs.usda.gov/nfs/11558/www/nepa/109524\\_FSPLT3\\_4467951.pdf](http://www.fs.usda.gov/nfs/11558/www/nepa/109524_FSPLT3_4467951.pdf).

<sup>2</sup> Humstone, Mary. “Jackson’s Town Hill: Snow King Ski Area. Survey and Preliminary of Historic Significance and Integrity.” (2012). Prepared for the Teton County Historic Preservation Board by Humstone Consulting.

kids were brought up on that mountain. Everybody's kids were. You could leave the babies in the bassinet in the station wagon at the bottom of the hill, take a run, then go check on them" (9).

Beyond being insightful or entertaining anecdotes, these local stories comprise a community narrative inherent to our town's identity. Humstone's approach captures the value of our "Town Hill" in intuitive, universal terms that we fear will be lost if future reports discussing adverse impacts only consider the most stringent or comprehensively defined standards outlined by the National Historic Preservation Act (Humstone, 9). While we recognize that the NHPA contains specific standards and definitions to ensure consistency and legal defensibility, simply because community associations with Snow King such as those in Humstone's report are much harder to define or have not yet been legally tested does not make them any less significant. We request that adverse impacts be considered through this cultural landscape lens.

### *Integrity of the Historic North Face*

The alternatives, as described in the draft alternative summary report<sup>3</sup>, each outline significant changes to the historic face of Snow King that would materially alter its look and feel. The face has been the charismatic visual of Jackson since the first ski jump was built in 1926, showcasing our love for the outdoors right in our town and also visually defining our town's limits; the ski hill blends directly into our streets and parks, with its size and extent mirroring the rural scope and feel of our historic rural landscape. Arguably the most important element of that visual, and of the contributing features of the historic district, is the concentration of ski runs and open space at the base as a stark contrast against the expansive, densely wooded slopes.

Beyond severe threats posed to wildlife, the proposed road, new gondola site, and the east / west expansions would diminish the impact of the historic district, drawing eyes and activity away from the traditional ski lines that locals have become long accustomed to over the generations, and watering down the overall visual effect and feel. Even if proposed new ski runs or roads were not found to have an adverse effect on the district or features themselves, boundary expansions would undoubtedly impact the setting and overwhelm the core visual character.

For example, Humstone's report describes how one community member perceived the reason for Snow King's popularity, stating, "[Snow King] was really a success because it was right there" and that residents "grew up in the town hill's shadow" (9). Part of this intensely localized feeling could reasonably be attributed to the openness and public access of the base, as well as the limited size of the resort, the extent of which is easily perceived due to concentrated ski runs and definitive boundaries.

This intensely local relationship between the town and the Town Hill continues to this day and is a key element of not only residents' lives but also visitor experiences, as it is undeniably a draw for the millions of visitors that pass through Jackson each year. As an iconic part of Jackson, which is an international travel destination, Snow King's significance at both the regional or national level merits exploration as well. As Humstone writes, "Although later eclipsed by the

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<sup>3</sup> Cirrus Ecological Solutions, LLC & Bridger-Teton National Forest. (2019). "Snow King Mountain Resort On-mountain Improvements Project EIS: Draft Alternative Summary Report." Retrieved from [https://www.fs.usda.gov/nfs/11558/www/nepa/109524\\_FSPLT3\\_4866348.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/109524_FSPLT3_4866348.pdf).

Jackson Hole Ski Area, Snow King was the first ski area to be developed in Wyoming and early on established Jackson Hole's reputation as a ski town" (20). Even in modern times, with much grander resorts minutes away, the resort remains a centerpiece of the visitor experience much like the antler arches, drawing visitors and First Ladies<sup>4</sup> alike to pose for photos with the historic runs as a backdrop.

Boundary expansions would detract from that localized relationship. While glading and thinning new areas outside the current boundaries might initially appear to be viable methods for maintaining the dominance of the historic district, all they do is mute the edges of what is still at its heart an intrusive effect; with the slopes as densely treed as they are, any variation will be recognizable from various vantage points throughout our valley. The use of in-bound terrain should be maximized instead of violating the historic district's boundaries.

Similarly, while the road network may not be historic due to changes over the years, the longer proposed road would still drastically change the setting, scarring character-defining features where it cuts through historic runs and drawing the eye away from traditional sight lines. Great consideration should be given to the visual impact of the road, especially given Goal 4.1.C of the Bridger-Teton National Forest Plan which states that roads should be designed to retain visual resource values. At this time no visual impacts have been analyzed.

At the base of the mountain, a new gondola is included in each alternative and sited on Town of Jackson land in Phil Baux Park. The chairlift routes up the mountain are historic, and changing those lines, as well as any tree clearing to accommodate a move, would alter the striking lines visible from nearly all of the valley floor. The base has always been included in the historic district and siting the lift landing in Phil Baux Park would draw the resort further into town, potentially filling the Park with long lifelines from tour bus visitation, and filling in the historic large clearing at the base that is frequently a community gathering space.

Both the proposed road and additional ski runs included in every single alternative would threaten the easily perceived historic boundaries, and we believe a visual analysis is needed to demonstrate how these additional developments would enhance or maintain the visual integrity of the historic area rather than detract from it.

#### *Integrity and Other Development*

Beyond changes on the north face of Snow King, other proposed changes could present adverse impacts to the historic district or to the immediate setting outside the district. New buildings erected at the top could disrupt the traditional skyline, as well as impact existing historic structures such as the Panorama House, particularly if new buildings were sited in spots that would change the historic view from the Panorama House or if they were incompatible with the existing historic design. As one of the last remaining historic structures, the Panorama House should be rehabilitated with opportunities for on-site interpretation (in addition to restaurant/amenity use) rather than be knocked down or disturbed by much newer and larger buildings. We request not only that designs follow the standards set by the Secretary of the

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<sup>4</sup> Cottier, Cody. (2019, Oct. 3). "Jackson greets first lady." *Jackson Hole News and Guide*. Retrieved from [https://www.jhnewsandguide.com/jackson\\_hole\\_daily/local/jackson-greets-first-lady/article\\_8e6baab5-ad5f-5db5-b9f5-556c677d65c3.html](https://www.jhnewsandguide.com/jackson_hole_daily/local/jackson-greets-first-lady/article_8e6baab5-ad5f-5db5-b9f5-556c677d65c3.html).

Interior but also that once specific designs and locations of proposed buildings are made available that they be shared with us and that we are included in discussion of mitigating any adverse impacts.

However, despite the desire to not disrupt the historic north face, neither do we believe that development should be automatically slated for the south slope. The back side of the ski area has thus far remained untouched and provides a unique contrast and connection for the recreationist on top to imagine how Jackson may have looked before it was developed, making the viewshed a valuable historic resource. Similarly, the current ridgeline and a significant portion of the north face are unmarred by lights at night. The project proposes dramatic increases in nighttime lighting along the road, more terrain on the north face, and some on the back side that will undoubtedly increase light pollution in town and the undeveloped Leeks Canyon, hurting our wildlife, dark skies, and the proposed observatory. The maps showing expanded lighting plans<sup>5</sup> do not demonstrate how it will impact the historic character of the ski area, or town itself, or the way in which residents and visitors may change traditional recreation use in the ski area.

### *Specificity and Cumulative Effects*

As has been mentioned throughout this letter, accurately evaluating the impacts to historic resources of the various proposed developments would require a level of specificity in the proposed improvements that is not currently available. And while future reports might consider the number and extent of adverse impacts of individual changes to Snow King's historic features, we want to ensure that each alternative is vetted holistically as a suite of changes. This is especially important given that the outcome of the Draft Environmental Impact Statement could be a blend of elements from different alternatives. Rather than merely looking at individual impacts of the gondola, or east-west expansions, or the road, please evaluate all impacts with an eye toward cumulative effects on the historic district or setting. Furthermore, when specific plans for developments affecting the historic district or the setting are proposed, please include us in discussions about mitigation of adverse impacts.

### *Conclusion*

Snow King Mountain Resort has long been a part of Jackson's community character – first by empowering a local lifestyle centered around a love for the outdoors, and then by continuing to be a draw for residents with a love for the wild and the ability to experience it where our streets end. Though two more ski areas have developed since the 1930s, the Town Hill has persisted not because its runs are superior to those at the world-class resorts of Targhee or Jackson Hole, but because of the community and culture it has empowered since the very first locals volunteered to cut the runs themselves (Humstone, 9). The Alliance values the contributions of the historic ski area to community character and believes that Snow King has much more value to add in terms of historic preservation, interpretation, and community character rather than merely more runs and summer amusement development.

As concerns of the Wyoming State Historic Preservation Office and the Teton County Historic Preservation Board are considered in the preparation of the Draft Environmental Impact Statement, we ask that our concerns be considered as well. Specifically, we ask that:

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<sup>5</sup> Bridger-Teton National Forest. (2018). "Maps of Snow King's Proposed Actions." Retrieved from [https://www.fs.usda.gov/nfs/11558/www/nepa/109524\\_FSPLT3\\_4396951.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/109524_FSPLT3_4396951.pdf).

- The value of local stories and associations, especially from a cultural landscape perspective, be included and respected in both the NHPA and NEPA processes; and
- That use of in-bounds terrain is maximized instead of allowing changes outside the existing footprint of development to threaten the dominance of the historic core; and
- That the impacts of proposed developments (e.g., the road, new runs, south slope development, new buildings at the base and at the top) be analyzed visually and in a cumulative manner; and
- As information and designs become available, or if stakeholder groups are established to discuss mitigation of adverse impacts are formed, that we be consulted and included.

In summary, the Alliance highly values our local Town Hill and how it contributes to Jackson's sense of place. It is exceptionally rare for a ski area to retain the level of integrity necessary for listing on the National Historic Register, and it is partly because it has maintained this integrity that Snow King continues to be a community hub. Any changes should be sensitive and complementary to, not destructive of, the immense wealth of natural, cultural, and historic resources that Snow King encompasses. If any changes are deemed adverse but necessary, they should only be allowed if they provide significant community benefit, and mitigation should be discussed with stakeholders.

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



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Teton Board of County Commissioners  
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