

SNOW KING DEIS SUMMARY

DEIS Components

1. Purpose and Need: displays the gap between an existing and desired condition

- Shows why a proposed action is necessary and serves as the basis for identifying the reasonable alternatives available
- Snow King DEIS argues that this action is needed because the on-mountain facilities at Snow King are in need of replacement and/or upgrades
 - o P&N seems to result from desired elements of the proposal, rather than the proposal resulting from a stated need for action
 - o What is Snow King currently not fulfilling from a FS perspective?

2. Range of Alternatives: “Consideration of a reasonable range of alternatives that can accomplish the purpose and need of the proposed action.” Council on Environmental Quality (CEQ)

- The alternatives in the DEIS fail to meet the National Environmental Policy Act (NEPA) requirement for a range of reasonable alternatives (all action alternatives are very much alike)

3. Effects Analysis: analyze “the full range of direct, indirect and cumulative effects of the preferred alternative and of the reasonable alternatives identified in the DEIS.” (CEQ)

- Ecological, aesthetic, historic, cultural, economic, social or health impacts, whether adverse or beneficial
- Snow King DEIS attempts to dismiss any significant negative effects
- Road: the number of skiway crossings would increase to 15; “However, skiway crossings are a common and manageable issue at ski areas” (DEIS)
 - o Doesn’t recognize that crossings on such steep slopes would have a much greater effect than what’s found at most ski areas
- Snowmaking: “Most of the increase in snowmaking coverage would be at higher elevations where wind would dissipate the cloud.”
 - o The wind isn’t usually blowing during inversions when the cloud is most dense
- Summit development: claims that summit structures are not visible
 - o Doesn’t include visibility from other areas than Jackson—can we see the buildings/lights from the Gros Ventre, etc.?

4. Cumulative Effects: “Direct and indirect effects on the environment that are expected or likely to result from the alternative proposals for agency action” (NEPA Handbook)

- Inadequate analysis of cumulative effects, including traffic, visitation, noise, light pollution, and intrusions on wildlife habitat within the adjacent national forest

Summary + Analysis

Road and Permit Area Expansions

- Ski Area Outdoor Recreation Enhancement Act (SAOREA): each activity/facility shall harmonize with the natural environment of the NF land and be located within the developed portions of the ski area
 - o The proposed road meets neither of these legal requirements
- Forest Service Manual (FSM): “Any expansion of a ski area permit boundary must be based solely on needs related to snow sports.”
 - o The road (and related ski area boundary expansion) is primarily needed for construction and servicing of facilities on the mountaintop which are likely to become the center of activity during the non-snow season
- FSM: facilities must be visually consistent with or subordinate to the ski area’s existing facilities, vegetation and landscape
 - o The road would be a large and permanent scar
 - o All of the proposed facilities, trails, and structures will together alter the landscape to a high degree and dominate the landscape
- FSM: new construction should not require significant modifications to topography
 - o The face road will be a significant modification of topography
- FSM: new facilities shall not compromise snow sports operations or functions
 - o The face road could create hazards where it crosses ski runs
 - o Road would interrupt the fall line of existing runs

Backside Development

- No difference in alternatives in DEIS
- FSM: activities and associated facilities must not exceed the level of development for snow sports
 - o Level of development would exceed that which is needed for snow sports.
- FSM: construction should increase utilization of snow sports facilities and not require extensive new support facilities, such as parking lots, restaurants, and lifts
 - o The ski school, new chairlift, T bar and carpet lifts on the back side comprise considerable new development

Summit Development

- No difference in alternatives in DEIS
- SAOREA: FS may authorize a ski area to provide natural resource-based recreational activities and associated facilities on National Forest System land
 - o Restaurant, bar, meeting venue, wedding venue have nothing to do with natural resource-based recreational activities

- FSM: FS should deny proposals to construct facilities and services on NF lands if these facilities and services are available in the general vicinity
 - o Restaurants, bars, and wedding venues are readily available in Jackson
- FSM: do not authorize new permanent facilities solely for weddings, concerts, etc.
 - o The in-ground wedding venue structure is against this direction yet it appears in every action alternative
- FSM: authorize concessioners to provide food services at temporary, quick-lunch counters that are a part of a resort operation
 - o A smaller-scale structure for use by skiers would be appropriate
- Other: Bonding? No mention of what is to happen to structures on NF land if abandoned by permittee

Zipline

- No difference in alternatives in DEIS
- SAOREA: each activity/facility authorized shall encourage enjoyment of nature
 - o A high-speed zipline is a thrill ride, does not further enjoyment of nature
 - o Cowboy Coaster was not allowed on FS land because of this requirement

Submitting your comment

- Comments due March 16, 2020. Submit electronic comments at <https://cara.ecosystem-management.org/Public//CommentInput?Project=54201>.
- Mail written comments to Derek Ibarguen, Acting Forest Supervisor, Bridger-Teton National Forest – Jackson Ranger District, P.O. Box 1888, Jackson, WY 83001. Please write “Snow King On-Mountain Improvements EIS” on the envelope.
- Comments may be faxed to 307-739-5010 or hand-delivered to 340 N. Cache St. between 8:00 AM and 4:30 PM, Monday through Friday, excluding holidays.