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November 22, 2020

Objection Reviewing Officer  
USDA-Forest Service Intermountain Region  
324 25th Street, Ogden  
UT 84401

Submitted via email to [objections-intermtn-regional-office@usda.gov](mailto:objections-intermtn-regional-office@usda.gov)

Re: Snow King Mountain Resort On-Mountain Improvements Objection

To whom it may concern,

Teton Backcountry Alliance (TBCA) objects to the Bridger-Teton National Forest's Draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS) regarding the Snow King Mountain Resort On-Mountain Improvements project, noticed October 9, 2020 by Patricia O'Connor, Bridger-Teton National Forest Supervisor, Responsible Official. TBCA filed timely comments on the Draft Environmental Impact Statement (DEIS) for this project on March 31, 2020, and now submit this objection letter pursuant to 36 CFR 218, Subparts A and B.

**1. We object to the FEIS's dismissal of the value of the back side for backcountry skiing.** As stated in the third and fourth paragraphs of our DEIS comments, the back side of Snow King has long been valued as a place for locals and visitors to experience backcountry skiing close to Jackson. Backcountry experiences in this area provide residents and visitors connections to wildlands and resources that are the unavailable in a mechanized lift-served ski area. These experiences are a centerpiece of what makes Jackson Hole unique, and why our county's tourism board has adopted the motto "Keep Jackson Hole Wild." Cutting new roads, adding an additional ski lift, installing noisy snow making, and grooming slopes will destroy that wildness that so many enjoy. There currently are ample opportunities in Teton County for lift-served downhill skiing. Snow King never currently reaches its capacity to service downhill skiers, and the addition of more ski terrain is therefore not needed and is unlikely to improve the viability

of the resort. In short, the FEIS as written does not address how resort expansion on the back side provides greater benefit to the public than maintaining opportunities for backcountry skiing there.

**Remedy:** The USFS must acknowledge the importance to the public of the winter/spring backcountry experience on Snow King's back side, and provide a cost/benefit analysis of back side development to the backcountry skiing community. How many skier-lift rides is a back-side lift expected to service? On what basis is a potential increase in demand based? Compare that to existing back-side backcountry use and its value. This analysis should be incorporated into the final decision.

**2. We object to the fact that the FEIS neglected to provide a feasibility analysis of Snow King's back side for ski area development. This lack of analysis could lead Snow King Resort to make a terrible mistake in attempting to develop the back side as a ski area.** As stated in the fourth paragraph of our DEIS comments, this foolhardy development whose benefit to anyone in humanity is highly questionable, would cost our community a treasured backcountry area, both for skiing and summer hiking. Some important points to consider:

- A. Backcountry skiing activity on Snow King's back side occurs mostly in March and April because the back side generally has poor snow quality in December, January, and February. The early-season snow cover is shallow; brush, stumps, and rocks protrude; and the thin snowpack is sugary and slabby. These conditions are caused by temperature-gradient-forming conditions and strong winds that strip the exposed ridges and faces clear of snow. If Snow King developed the back side as a ski area, the resort would have to attempt to pack the shallow snowpack with grooming machines and install snowmaking equipment. This would have significant impacts on the area's soundscape, vegetation, and soils resulting in considerable spring/summer erosion and changes in hydrology, particularly in the "Straight Arrow" area. Erosion management was not addressed in the FEIS for back-side grooming and road development.
- B. During the cold winter months, wind blows the snow off the ridges and faces, and deposits it into three different gullies. These three gullies would be the only places skiing might be consistently good during December, January, and February; but there are significant problems with regard to the feasibility of developing a ski area for those three small places (Please refer to ski area map below):
  1. **Upper Leeks Canyon:** This gully would prove to be the main egress avenue for skiers and snowcats on the back side, but it is too small (2.6 acres), narrow, and too steep to be worthy of a ski area development that is seeking to provide more moderate terrain.

2. **Unnamed gully between Leeks Bowl and Kaiser's Ridge** (shown on map with a down arrow): As the preferred alternative indicates, this gully would require major tree and brush removal in prime moose habitat, which was considered in the FEIS. This area comprises a maximum of 12 acres of ski terrain, which is not worth the loss of wildlands and habitat associated with development. Also, gladed terrain is not intermediate terrain. Intermediate skiers need wide open terrain with no obstacles. Hence to create intermediate terrain here, the resort would need to clearcut this gully.
3. **Kaiser's Gulch**: This would be the best area for skiing in the back-side permit area, comprising only 21 acres, and only good after January or February.

**Remedy:** It is clear that the FEIS poorly analyzed the feasibility of ski area development on the back side of Snow King. This area will have perhaps one month of good skiing on the back side before closure in early April. We argue that one month of ski area operations is not worth the destruction of this backcountry area for 33 acres of skiing (12+21 from items 2 and 3 above). For backcountry skiers, who would start using the area in March, resort development on the back side would displace their uses because of lifts, roadcuts, moguls left over from winter, old ski tracks left over from winter, tear down operations, and increased access and tracks in "out of bounds" (OB) areas adjacent to the permit area boundary. Clearly, with the exception of Kaiser's Gulch, most back-side terrain will not be appropriate for intermediate skiers, as is cited in the EIS, because of slope steepness, slope narrowness, earthen obstacles, and icy crusts. Snow King and the USFS need to hire professional ski area development consultants to provide a legitimate in-depth feasibility study for the back side of Snow King, and it must provide a full-accounting cost/benefit analysis of the value of back-side development based on skier desirability and quality of experience, and how that need outweighs the needs of backcountry users who have enjoyed the area for a hundred years. This analysis should be incorporated into the final decision.

**3. We object to the narrow range of alternatives presented in the FEIS.** As stated in the last paragraph of our DEIS comments closing paragraph, the FEIS does not provide a range of alternatives that exclude back-side development, other than the 'no action' alternative. We consider that this disregards the 2012 Teton County Comprehensive Plan, which states that resorts should be limited to their existing footprints. It also disregards FSM 2343.14<sup>1</sup>, which states that the USFS should "ensure that additional seasonal or year-round recreation activities and associated facilities are located and constructed to harmonize with the surrounding natural environment." Back-side development would most definitely not harmonize with the surrounding natural environment, given its impacts to wildlife, backcountry recreational uses, and the serenity of Snow King's back side. The impacts of back-

side development are indeed great enough that it is negligent to draft such a narrow range of alternatives that all include back-side development.

**Remedy:** The USFS must develop at least one viable alternative, preferably two alternatives, that explore creative options for increasing and improving beginner and intermediate skier terrain that do not include new cut ski runs, roads, or new ski lifts on the back side of the mountain. One alternative should include no back-side development whatsoever with all improvements occurring on the front side, with expanded boundaries there. Another alternative could include the proposed yurt park on Stanley's Ridge without any other resort development on the backside. This would satisfy the resort's need to provide a backcountry experience for those looking for a yurt trip. Snow King could profit from this alternative by offering professionally guided backcountry experiences to guests. However, TBCA generally would not support this alternative because the back side of Snow King has been used for 100 years as a day-use backcountry skiing destination. Adding yurts would destroy this historic activity. Furthermore, if back-side development did go forward, resort installations would completely foil the purpose of a yurt park. Yurts are for backcountry skiing and make no sense inside a ski resort. The FEIS must consider the value of what the resort wants to create. In this case, the resort is creating a party spot, which has little to do with the purpose and need, and flies in the face of the long tradition of backcountry skiing in this area.

Page 49 of the FEIS makes biased, flawed, and unsupported arguments as to why the FEIS did not need to consider alternatives that did not include back-side development other than the No Action Alternative. It claims that the back side is the only option to provide intermediate terrain. However, as we have suggested above, there is much more to intermediate skiing than simply slope angle. Slopes also need to be wide open and have consistent snow quality. Snow King's backside does not offer adequate acreage (only 33 acres and even less if the slopes are gladed rather than cleared) of wide-open intermediate terrain and high-quality snow conditions to warrant development. There are many more options to create wide-open intermediate ski terrain with consistent snow on the front side.

Sincerely,



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*Virtual rendering of Snow King Mountain from the west.*

- a. top of Summit chairlift
- b. Snow King summit (Peak 8,005)
- c. winter range closure
- d. Hourglass
- e. The Ballroom
- f. Sully's Ridge
- g. Sully's Gully
- h. Straight Arrow
- i. Kaiser's Ridge
- j. Kaiser's Gulch
- k. point 7,966
- l. Stanley's Ridge
- m. Stanley's Gulch
- n. Stanley's Slide
- o. Tom's Ridge
- p. Leeks Canyon
- q. Leeks Bowl

**Snow King Mountain, Broken Thumb:**

Former assistant Snow King ski school director Joe Carroll named this narrow tree-lined gully

