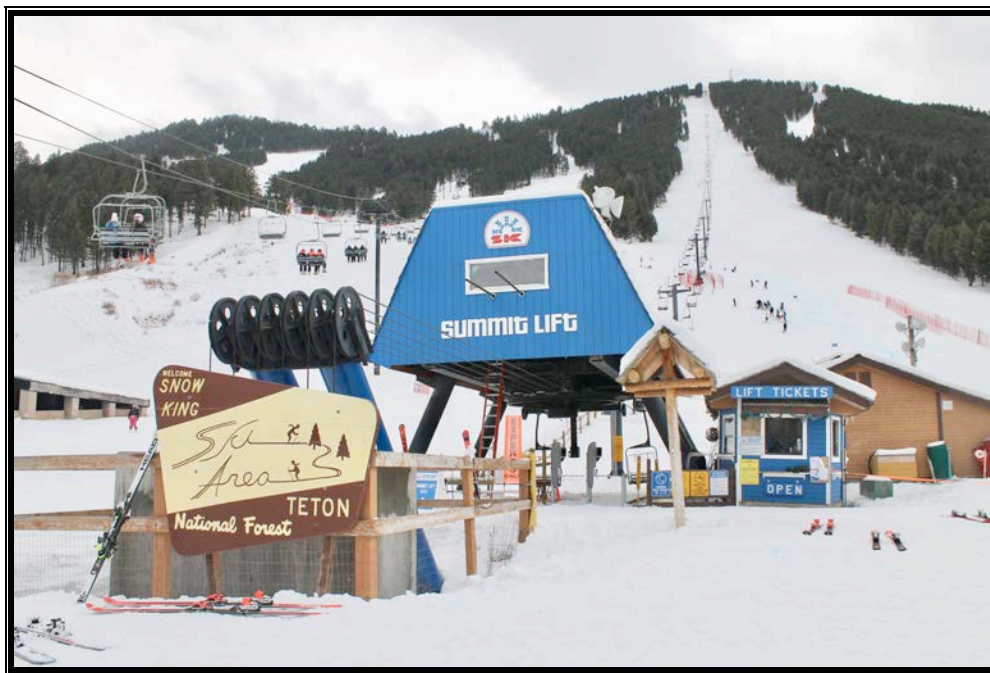


SNOW KING MOUNTAIN RESORT

Bridger-Teton National Forest
Jackson, Teton County, Wyoming



prepared for
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completed by
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US Forest Service Project #BT-19-1138
WY SHPO Site #48TE.1944

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PROJECT BACKGROUND

This project originated in November 2018, when Cannon Heritage Consultants Inc. (“CHC”) of Logan, Utah and Tatanka Historical Associates Inc. (“THAI”) of Fort Collins, Colorado were engaged to provide Cirrus Ecological Solutions (“Cirrus”) with documentation and analysis of the historic Snow King Mountain Resort in Jackson County, Wyoming. The need for the project arose from planning for various changes to the ski mountain and its associated facilities. Because the resort operates under a special use permit with the US Forest Service (USFS), Cirrus is providing support under the National Environmental Protection Act (NEPA).

Reporting on the project is intended to comply with best practices in the field of historic preservation consulting and to meet USFS and Wyoming SHPO (WYSHPO) expectations for National Historic Preservation Act (NHPA) Section 106 survey and analysis. The historic resource under study was evaluated in light of the integrity guidelines and significance criteria established by the National Register of Historic Places (NRHP). Guidance was also provided by additional federal documents. The first of these is the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (1996). A second is the National Park Service’s *Preservation Brief 36: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes* (1994). The final document is *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes* (no date).

Snow King Mountain Resort (Site #48TE.1944) is a historic landscape comprised of a collection of groomed ski runs (known locally as trails) separated by stands of trees, along with a relatively small number of buildings, structures and objects such as warming houses, ski lifts, night lighting, snowmaking equipment, access roads and other features that are necessary for year-round operation of the facility. Spatially, most of the resort consists of the ski mountain itself, with the trails and trees its most visually obvious features. All of these characteristics are typical, with differences of scale, of the many small to large-sized ski areas scattered throughout the western United States.

The mountain has been in use for skiing since the 1920s and 1930s, first informally and then since the 1940s as a more organized and developed for-profit resort. Many changes have occurred there since the inception and early years of skiing at the site. Some of these are historic alterations completed over fifty years ago (essentially prior to 1970) that are now viewed as historic in and of themselves. Other changes have taken place within the past five decades and even into recent years. These are, by definition, non-historic alterations to the ski area.

While the upper, larger area of the ski mountain is owned by the US Forest Service and managed as part of the Bridger-Teton National Forest, parcels in the lower area are owned by Snow King Mountain Resort LLC and the Town of Jackson. Preliminary discussion about the scope of work and APE occurred through telephone calls with the Bridger-Teton National Forest and WYSHPO. The first conversation with archaeologist

John Schubert, heritage program manager with the Bridger-Teton National Forest took place on 13 November 2018. The second conversation, on 20 November 2018, was with historic preservation specialist Brian Beadles with WYSHPO.

Both calls began with discussion of the fact that Snow King Mountain Resort has been extensively documented in recent years, with the most recent intensive-level studies and eligibility determinations taking place between 2012 and 2014. These provided extensive documentation of the ski area, including full historical contexts and analysis of integrity and National Register eligibility. The two key studies referenced are the following, both of which were consulted for the current project:

Mary Humstone, *Jackson's Town Hill: Snow King Ski Area*, Prepared by Humstone Consulting for the Teton County Historic Preservation Board, January 2012.

Kerry Davis, *Cultural Resource Investigation and Wyoming Cultural Properties Form, Snow King Ski Area*, Prepared by Preservation Solutions for Snow King Mountain Resort, December 2014.

The high quality of work done during the course of those studies partially shaped the scope of work for the current Section 106 project. Both the USFS and WYSHPO agreed that there was no need to recreate recent documentation, particularly since the work was professionally done and remains relevant today. This includes the contextual history found in those documents, which was extensively referenced during the course of the current project. The reader is encouraged to consult that information for background on the site's history and development. With that in mind, the current study launched from where the previous ones left off, taking a look at what has occurred on the site during the past several years and the status of the resource today.

The 2012 and 2014 studies concluded that a defined area of the Snow King Mountain Resort is eligible for the NRHP as a historic landscape under Criterion A for its association with a "significant pattern of events in the recreational history and development of Jackson" (Davis, 2014, p. 4). Despite this determination, no effort to pursue landmark designation has occurred over the past five years. Based upon review of these studies combined with current inspection and focused additional research, the present study comes to its own conclusions regarding the integrity and eligibility of the ski area. These conclusions are presented in detail below.

The current proposed plans for changes on the mountain shaped the Area of Potential Effect (APE) for this study. Discussion about the APE took place in consultation with the USFS and WYSHPO, with a final conference call on the subject occurring on 5 March 2019. Most of the ski area is included within the APE, which extends across the face as well as along the ridgeline and onto the back of the mountain (*see map on page 3*). Those areas left out contain only non-historic resources. These are found in the original but modified northern base area and the completely non-historic eastern area served by the Rafferty Lift. Both agencies also agreed that the APE did not need to extend northward beyond the historic base area into the developed town of Jackson.



Project APE/Boundary

Snow King Ski Area

Cirrus Ecological Solutions

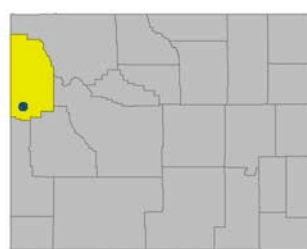
Produced by
Cannon Heritage Consultants, Inc.
Logan, Utah
15 May 2019



Legend

- Snow King Eligible Historic Landscape
- Project APE

0 200 400 600 Meters



Mapped in NAD 1983 UTM Zone 12N

Teton County, Wyoming

1:16,000

APE and NRHP-Eligible Historic Landscape Boundaries

Prepared May 2019

The scope of work for this project, completed between November 2018 and May 2019, was defined by the following tasks:

Completion of Fieldwork - Fieldwork was completed at Snow King Mountain Resort. In addition to looking at specific resources associated with the ski mountain, the larger setting was also documented to ensure that all of the aspects of integrity were considered. The goal of this work was to address relevant historic and non-historic resources, including the site and its surroundings, and to determine the integrity of individual resources and the site as a whole. Photographs and field notes were collected to record the various details found there.

Archival Research - Archival research was completed to collect a limited amount of additional information about the site's history and to assess the question of its integrity. This work was done with the understanding that there was no need to recreate the historic contexts found in the recent studies. However, additional research was completed to locate information on the Snow King Sports and Events Center, and to determine what other changes might have taken place in recent years. While some records were found online, most were collected from the archives of the Jackson Hole Historical Society. Snow King general manager Ryan Stanley was also interviewed during this process of information collection.

Preparation & Submission of Deliverables - Written documentation in the form of this report was completed to present the results of the fieldwork and research. Because no new resources were recorded, there was no need for the completion of site forms.

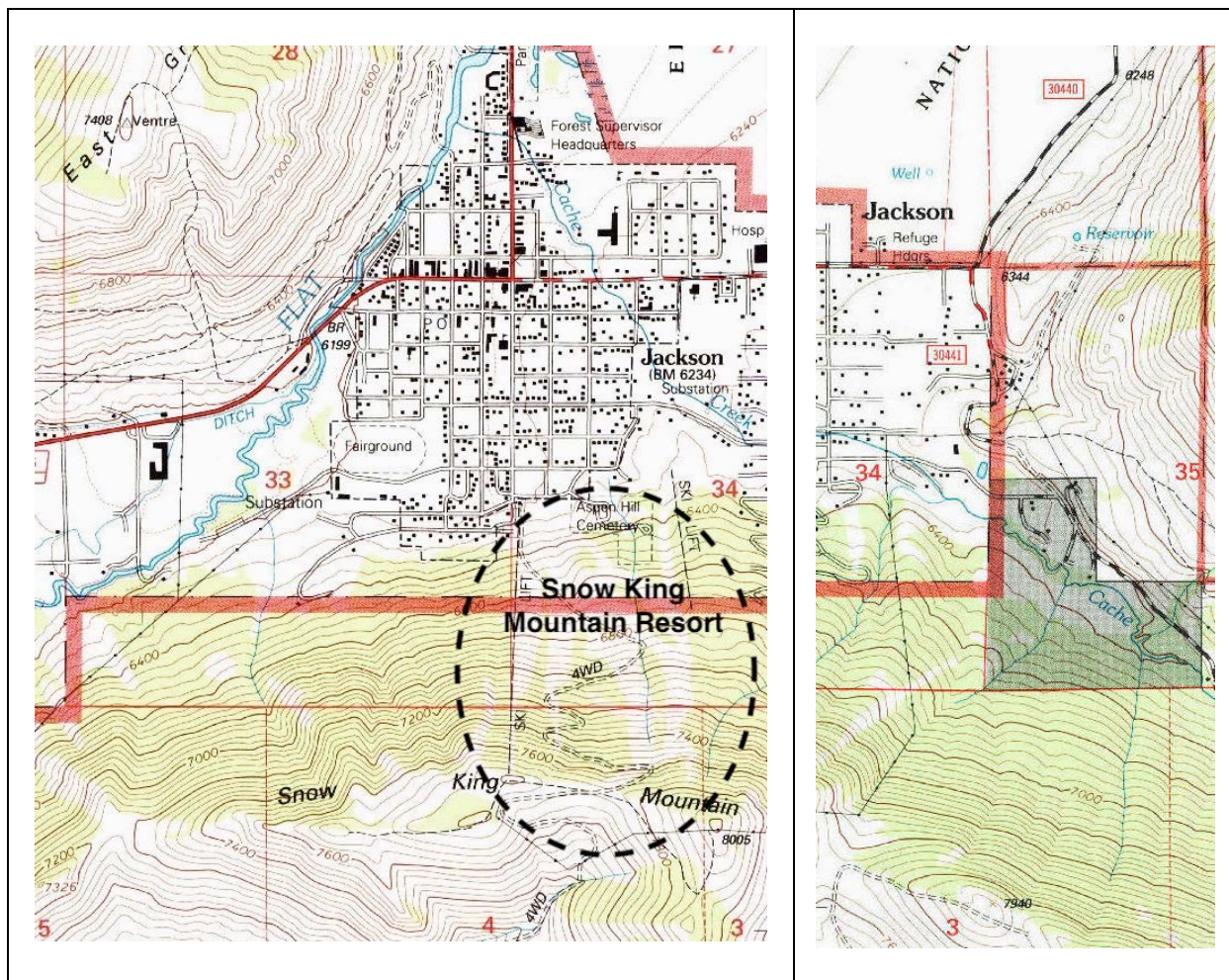
ENVIRONMENTAL SETTING

The historic resource under study is the NRHP-eligible Snow King Mountain Resort, which is located on the south edge of the town of Jackson, Wyoming. This area is also toward the southern edge of the Jackson Hole valley, with the Teton Range to the north, Wyoming Range to the south, and the Gros Ventre Mountains extending from Jackson to the east. Most of the mountain is within the Bridger-Teton National Forest, with additional areas of public and private land in and around the base. The resort's street address encompasses the area from 100 to 330 East Snow King Avenue. At the base of Snow King Mountain, the loading station for the Cougar Lift sits at an elevation of approximately 6,280' above sea level and the Panorama House at the top is at around 7,800'. The areas under study are found in the south halves of Sections 33 and 34, Township 41 North, Range 116 West and in the north halves of Sections 3 and 4, Township 40 North, Range 116 West.

The base area of the resort is located south of Snow King Avenue, southeast of its intersection with South Cache Street. For the purpose of this study, this does not include the non-historic Rafferty Center, Rafferty Lift and Snow King Hotel and Conference Center at the east end of Snow King Avenue, all of which were developed starting in the 1970s. The open area along the south side of Snow King Avenue from

South Cache Street east to the Snow King Sports and Events Center is partially occupied by the Town of Jackson's Phil Baux Park and Ballfield. These features are outside the APE and were treated as part of the historic ski area's setting.

Parking is found along nearby town streets, in a lot that arcs around the ballfield, and in another small parking lot at the south end of South Willow Street. This last parking lot is adjacent to the non-historic Snow King Sports and Events Center, which was constructed in the early 1990s just east of the lift loading terminals. Because the events center is a non-historic feature, it was excluded from the APE for this study. However, it is addressed below as an element of the ski area's setting.



General Location of the Snow King Mountain Resort
 Jackson and Cache Creek, Wyoming 7.5' Topographic Maps
 US Geological Survey, 1996

The resort as a whole encompasses more than four hundred acres of land, most of it steeply sloped forest interrupted by cleared ski runs. The lower loading stations for the Cougar and Summit Lifts are situated directly west of the Snow King Sports and Events Center. The Cougar Lift heads slightly southeast to a midpoint on the mountain and the Summit Lift heads slightly southwest to the top. Directly south of the ballfield is the ski

resort's tubing hill, along with a new condominium complex that is under development. Lighting has been installed on the mountain to allow for night as well as day use.

While the areas to the east, west and south of the ski resort are occupied by largely undeveloped mountainous terrain, the areas north and west of the base are developed and part of the town of Jackson. This includes town streets, residences, offices and light commercial uses. Downtown Jackson is seven blocks to the north. Due to its prominence above the south edge of town, Snow King Mountain is visible from almost anywhere in and around Jackson. However, from most locations in town, the view is at least partially obstructed by buildings and trees.

FIELD DOCUMENTATION

Fieldwork was completed at the project site between 17 and 19 December 2018. Throughout this visit, it was snowing and very cold, and the grounds at the ski area were buried in a deep layer of snow. Only those developed resources above the snowline were visible. Photographs and field notes were collected during the course of this work. In addition, a meeting took place with Ryan Stanley, general manager of Snow King Mountain Resort. The purpose of this meeting was to discuss and gather information about the historic resources at the ski area, including those that could not be visited in person due to weather conditions and difficulty of access. Mr. Stanley provided information about changes that have occurred in recent years, as well as current photographs of some of the resources.

Addressing the goal of evaluating the current integrity and National Register eligibility of Snow King Mountain Resort as a historic landscape, the following information was gathered during the field documentation phase of the project. This involved assessing the current physical characteristics and integrity of those resources that were previously found to contribute or not contribute to the site's eligibility. To facilitate comparison between documents, the resource numbers assigned on the cultural properties form completed in 2014 are also provided below. For more detailed descriptions of these resources, the reader is directed to that earlier report. The current site maps on pages 9 and 10 provide the locations of most of the features discussed below.

Contributing Resources – Sites (Ski Trails)

Tow Slope / Holy Land (Resource 1) – This intermediate trail, constructed around 1946, is located in the lower northwest area of the mountain above the tubing hill and below the Exhibition run. It is also situated directly below the Summit Lift. The run has not experienced any alterations since it was last recorded in 2014.

Old Man's Flats / Old Lady's Flats (Resource 2) – This intermediate trail is a combination of what is now termed Old Man's Flats and Old Lady's Flats. Constructed around 1947, it runs diagonally across the mountain for a distance of about 1,560'

between the Grizzly trail and the Cougar trail. The only change that has taken place there since 2014 has involved grading to decrease the angle of the slope.

Elk & Lower Elk (Resource 3) – This advanced to intermediate trail, constructed around 1948, is located in the middle of the ski mountain and is one of its major runs. It starts below the ridgeline and extends along a curved alignment to the north and northwest for about 3,230'. The trail ends where it merges into Old Man's Flats. Since 2014, the only change to Elk and Lower Elk has involved the installation of a pump house for the snowmaking waterline. This is located at an approximate midpoint along the trail adjacent to the western tree line. The wood frame building has a shed roof and a door in its north wall. Its horizontal wood siding has been painted a dark color, helping it to blend into the surrounding trees. Although visible from the base, the building is not readily apparent unless its location is pointed out.

Belly Roll (Resource 4) – This steep expert trail, constructed in 1946, is located toward the top of the mountain, running for a distance of about 1,200' from the ridgeline toward the northwest. It eventually merges into the Cougar trail. No changes have taken place along this trail since 2014.

Jump Run (Resource 5) – This advanced trail, constructed around 1950, is located on the lower flank of the ski mountain. It runs through the trees on a diagonal for a distance of 600' from Old Man's Flats and Turnpike down to the Cougar Lift and the Snow King Sports and Events Center. Since 2014, a horse trail was developed along and across this ski trail, although this is no longer used. Although reportedly visible when the site is free of snow, it is being erased by vegetation. In addition, the trees along the Jump Run have been thinned, although the larger ones were not removed.

East and West "S" Chutes (Resource 6) – Treated as a single resource, these two steep, curved, parallel expert trails are separated by a stand of trees. Constructed around 1952 and 1959, they are located toward the eastern top of the mountain and run from the ridgeline for a distance of 1,450' down to the top of the Grizzly trail. No changes have been made to the two trails since 2014.

Grizzly / Lower Grizzly (Resource 7) – This advanced trail, constructed around 1958, is located in the upper eastern area of the ski mountain, heading north and then curving to the northwest. It starts at the lower end of the West "S" Chute and runs for a distance of 1,370' parallel to Elk and Lower Elk. Lower Grizzly eventually merges into Old Man's Flats. No changes have been made to the trail since 2014.

Cut Off (Resource 9) – This short advanced trail, just 400' in length, is located in the upper eastern area of the ski mountain. Constructed around 1959, it starts at the lower end of the East "S" Chute and ends where it merges into the upper Grizzly trail. No changes have been made to the trail since 2014.

Cougar (Resource 10) – This advanced trail is predominantly located in the lower half of the mountain, directly above the Cougar Lift. Constructed around 1958, it starts at the lower end of Belly Roll, extending for a distance of 2,475' to where it merges into

Tow Slope/Holy Land. The Cougar trail is aligned on a north-south axis and is bordered by trees to the west and the short non-historic Bighorn trail to the east. Since 2014, the only change has involved the installation of snow guns along its western tree line.

Exhibition (Resource 11) – This advanced trail, built around 1947, is located in the western area of the mountain. Wide toward the bottom and narrowing as it rises in elevation, Exhibition is 2,390' in length and follows the alignment of the Summit Lift. It starts at the lower end of the non-contributing trail known as Upper Exhibition and is aligned downslope to the north, ending where it merges into the Tow Slope / Holy Land trail. Upper Exhibition, constructed in the 1980s (see Resource 12 below) and evidently not reviewed through a Section 106 process, essentially forms an extension of Exhibition that continues to the top of the mountain at the Panorama House. Although there is no visible demarcation between Upper Exhibition and Exhibition, they were treated in the 2012 and 2014 studies as separate trails. Changes made to Exhibition since 2014 have been limited to the installation of lighting along with snowmaking guns.

Bearcat (Resource 13) – This narrow expert trail, constructed around 1959, is located toward the top of the mountain, where it starts along the ridgeline west of the Panorama House. From there it drops down 1,200' in length to eventually merge with the Bearcat Glades trail. A short connection also diverges to the east to meet the Exhibition trail. No changes have been made to the trail since 2014.

Bearcat Glades (Resource 14) – This advanced trail, built around 1965, is located below the Bearcat trail and runs through a thinned stand of trees for a distance of 1,100' before merging with the Exhibition trail. No changes have been made to the trail since 2014.

Contributing Resources - Buildings and Structures

Old Snow King Double Chairlift Unloading Platform (Resource 21) – This structure, built in 1959, is located on the ridgeline at the top of the mountain, just northeast of the unloading station for the Summit Lift. While the platform remains standing, several historic features were removed in the 1980s after the new Summit Lift was constructed. According to the 2014 study, these included the “removal of stairs along the east edge, removal of the lift mechanicals and operator shack, [and] removal of level decking associated with the Snack Shack.” In addition, the Snack Shack was moved away from the platform and has been demolished. Non-historic chain link fencing has been added between the original pipe railings that run along the platform's perimeter as a safety measure. No changes have been made to the structure since 2014. Despite these alterations, the platform is in its original location and enough of the structure remains that it continues to convey much about its original design, use and construction.

Panorama House (Resource 24) – This building, constructed around 1960, is located along the western ridgeline of Snow King Mountain, just west of the unloading station for the Summit Lift. It appears to be a manufactured building that was purchased by the ski area and then customized for use in this location. By 2014, the building had experienced alterations that included “the introduction of a three-light fixed window in

the southeast (secondary) elevation, an exterior mechanical unit, and small rooftop antennas.” Since 2014, the Panorama House has experienced additional modifications. Completed in 2017, these included replacement of all the windows, the opening of a few new windows (one used as a ticket window), the installation of some wood siding, complete remodeling of the interior, and the placement of additional antennas on the rooftop. Despite these alterations, the building is in its original location and enough of it remains that it continues to convey much about its original design, use and construction.

CCC Summit Shelter (Resource 25) – This small wood frame building is located among the trees a short distance southwest of the Panorama House. Although its origins and history could not be confirmed through archival research, it appears to have been constructed during the mid-1930s and used by the Civilian Conservation Corps. Mounted on skids, it was designed to be moved to any location where it was needed. No changes have been made to the building since 2014.



**Current Winter Sports Map
2018-2019**



Current Summer Activities Map 2018-2019

Non-Contributing Resources Sites, Buildings, Structures & Landscape Features

Kelly's Alley (Resource 8) – This intermediate trail, about 2,120' in length, is located above the Rafferty Center and west of the Rafferty Lift. This places it within the lower eastern boundaries of the historic ski area. Although built around 1959, the trail was negatively impacted starting in the late 1970s with development of the Rafferty Lift and Snow King Hotel and Conference Center. The trail was further changed during the 1980s with the installation of a miniature golf course along with thinning of the trees that more clearly defined its eastern edge. Also present there are the non-historic Cowboy Coaster and Alpine Slide. In 2014, it was determined that the trail had been compromised enough that it no longer conveyed its historic association with Snow King and failed to contribute to the ski area's National Register eligibility. This determination holds true today and the trail remains a non-contributing resource although it falls within the eligible boundaries.

Upper Exhibition (Resource 12) – This expert trail is located in the upper western area of the mountain and following the alignment of the Summit Lift. About 1,100' in length, Upper Exhibition drops from the ridgeline below the Panorama House and Old Snow King Double Chairlift Unloading Platform. From there it continues to the top of the Exhibition trail. Although there is no visible demarcation between these two and they appear to be a single feature, they are actually considered two different trails in terrain and difficulty. Built around 1986 by opening the forest below the ski lift, in 2014 Upper Exhibition was determined to be non-contributing due to its age of fewer than fifty years. It remains a non-contributing resource today for the same reason.

Return Trail (Resource 15) – This short beginner's trail is located in the lower eastern area of the mountain, acting as a traverse between Turnpike and Kelly's Alley. Constructed around 1959, it once passed through the cemetery property. However, it no longer follows its original alignment to avoid the cemetery and has become more narrow. Due to these changes, Return Trail is a non-contributing feature.

Turnpike (Resource 16) – This short beginner's trail is located south of the cemetery and the Return Trail. It traverses the area between the top of Kelly's Alley and the top of Jump Run, also providing access to the top of the Return Trail. Constructed around 1959, it previously ran through a dense stand of trees. These have been extensively thinned in recent decades, opening the trail to view. Due to this substantial change in its character, Turnpike is considered a non-contributing feature.

Bighorn (Resource 17) – This short advanced trail is located near the center of the mountain, essentially running beneath the upper part of the Cougar Lift. It starts at the top of the lift and runs for a distance of about 450' before reaching a point where it merges with the Cougar Trail. Bighorn was constructed around 1998 and due to its age is considered a non-contributing feature.

Bison (Resource 18) – This short advanced trail is located near the center of the mountain, running east of and parallel to the upper part of the Bighorn Trail. It runs for a distance of about 650' before reaching a point where it merges with the Lower Elk Trail and Old Man's Flats. Bison was constructed around 1998 and due to its age is considered a non-contributing feature.

Old Snow King Double Chairlift Base Drive Shelter (Resource 19) – This building was constructed in 1959 to replace the earlier single chairlift drive shelter. It was located in the base area of the ski mountain close to where a new condominium building is under construction next to the tubing hill and south of the ballfield. In 2014, the shelter was listed as a contributing resource. However, the building was demolished in 2016 or 2017 and is no longer standing.

Old Snow King Single/Double Chairlift Summit Drive Shelter (Resource 20) – This building is located along the ridgeline adjacent to the Old Snow King Double Chairlift Unloading Platform (Resource 21). Constructed in 1946, it originally housed the upper bull wheel and associated terminal equipment for the single chair lift. In 1959, this was upgraded to a double chairlift. The building's use changed in the early 1980s when it

became a shelter for the ski patrol. This involved removal of the lift equipment, enclosure and remodeling, and the exterior was re-clad in board and batten siding. Due to these alterations, the building no longer conveys a clear sense of its historic use and it is now a non-contributing feature on the site.

Summit Double Chairlift (Resource 22) – The lower terminal of the Summit Lift is located in the base area just west of the Snow King Sports and Events Center. From there, the lift rises up the face of the mountain along the line of its cables and towers, heading slightly southwest and passing above the Holy Land, Exhibition and Upper Exhibition trails. Its upper terminal is situated along the ridgeline near the Panorama House. Installed in 1981-82 to replace the 1959 chairlift (which followed a similar but slightly different alignment), the Summit Lift is a non-historic feature exhibiting 1980s design and technology. Consequently, it is considered a non-contributing feature.

Cougar Triple Chairlift (Resource 23) - The lower terminal of the Summit Lift is located in the base area just west of the Snow King Sports and Events Center. From there, the lift rises up the face of the mountain along the line of its cables and towers, heading slightly southeast and passing above the lower length of the Cougar Trail and the entire length of the Bighorn Trail. Its upper terminal is situated at a midpoint on the mountain at the top of the Bighorn Trail. Installed in 1993-94, the Cougar Lift is a non-historic feature exhibiting 1990s design and technology. Consequently, it is considered a non-contributing feature within the eligible district.

Snack Shack (Resource 26) – This small wood frame building, constructed around 1960, was historically located atop the Old Snow King Double Chairlift Unloading Platform. However, it was removed from that structure in the 1980s after the new Summit Lift was constructed. The building was placed on another site more than sixty feet away from its original location and served the ski area for another three decades. It was demolished in 2016 and no longer exists.

CCC Trail (Resource 27) – This equine and hiking trail, reportedly installed by the Civilian Conservation Corps during the mid-1930s, historically snaked its way up the mountain's north face from the base to the ridgeline. Two short segments of the trail were identified during the 2014 study. Currently buried under snow, the trail segments could not be inspected. Most of the trail appears to have been erased over the decades due to erosion, road development, and as a result of ski trail grading, tree clearing and grooming activities. No intentional changes have been made to the remaining trail segments since 2014. An effort was made to locate archival records about the trail using sources held by the Jackson Hole Historical Society. However, no documents were found and no mention of the resource appeared in local newspapers of the era. The history and alignment of this feature could not be substantiated. Until such information is located, the trail is determined to be a non-contributing resource on the ski mountain due to its overall lack of integrity and supporting historical documentation.

Wind Break Terrace Field (Resource 28) – This feature is located southeast of the Panorama House just below the ridgeline on the south face of Snow King Mountain above Leeks Canyon. It cannot be viewed from the town of Jackson or from the Snow

King base area. Constructed around 1958, the terrace field was documented in 2014 as a contoured meadow featuring more than twenty parallel earthen terraces, each about four feet wide. The field was bordered by wooden snow fencing, some of which may have dated back decades. Trees were reported to have been planted along the terraces to act as a windbreak, although these are no longer present. Currently buried under snow, the terrace field could not be inspected. According to Snow King Mountain Resort manager Ryan Stanley, the snow fencing has been removed since 2014. In addition, the terraces have degraded as a result of erosion and are no longer as visible from the ground as they once were. They are somewhat visible in satellite imagery. Due to these characteristics, the Wind Break Terrace Field exhibits a diminished level of integrity and is determined to be a non-contributing feature on the site.

Wireless Communications Tower (Resource 29) – Constructed around 1999 on the grounds south of the Panorama House, this feature most prominently consists of a freestanding metal lattice telecommunications tower over one hundred feet tall. The tower is located within a fenced enclosure that includes an equipment shed. Due to its age, it is determined to be a non-contributing resource on the site.

Road Network (no resource number) – This network of access roads, first installed during the 1950s and expanded/changed since then, climbs the mountain in a switchback pattern. While some roads snake up the face, another one rises up the back of the mountain from Leeks Canyon. These were constructed to facilitate maintenance operations and development of the ski lifts and other features such as the Panorama House. Segments of the north face road system are used during the winter months as the Slow Trail ski run. Because the network developed and changed over a long period of time and the roads intersect in various locations, it is difficult to determine what was built when and to isolate what is historic and what is not. Consequently, the resource fails to clearly convey its age and relationship to development of the ski mountain. For these reasons, the Road Network is considered non-contributing to the site's NRHP eligibility.

Condominium Building (no resource number) – This building, currently under construction, is located west of the lower lift terminals and south of the ballfield in the area of the tubing hill. As a new feature that is located within the historic landscape boundaries, it is determined to be non-contributing to the property's NRHP eligibility.

Resources Outside the APE and Eligible Landscape

The APE and NRHP-eligible historic landscape do not include several adjacent features, some of which are associated with the Snow King Mountain Resort. These include the Rafferty Center, Rafferty Lift and associated ski trails, and the Snow King Hotel and Conference Center. Located in the far eastern area of the mountain, these features were developed in the 1970s and 1980s. They are discussed at length in the 2012 and 2014 reports. The non-historic Phil Baux Park (circa 1980s) and Ballfield (circa 1945 / modified 1970s) extend along the south side of Snow King Avenue directly north and northwest of the Summit and Cougar lower lift terminals. While the Sports and Events Center (1992) sits just east of these lower lift terminals, it is also non-

historic. Aspen Hill Cemetery, in use since the early 1900s if not earlier, is a historic resource but is unrelated to the ski resort.

These nearby features were discussed with staff from WYSHPO and the USFS, which recommended that they be treated as elements of the historic ski resort's setting rather than as non-contributing on-site resources. Because the earlier reports provided little about some of them, their histories and character were looked into within time and budgetary constraints to provide additional context for the current study.



**Snow King Mountain from Cache Street and Simpson Avenue
December 2018**

ARCHIVAL RESEARCH

In addition to fieldwork at the site, the project involved a limited amount of focused archival research to expand understanding of the ski area and its historic context. Again, the purpose of this research was not to replicate the extensive work already completed between 2012 and 2014. Review of that work indicated that it was extensively and reliably done. Instead, the current effort focused upon answering lingering questions about development and changes that have taken place in the vicinity of Snow King Mountain Resort. This included locating information about the CCC's involvement with the mountain during the 1930s and addressing other questions that have been raised about its immediate environs.

During the weeks prior to the Jackson fieldwork trip, online research was completed to locate resources that might be available. This resulted in the collection of relevant maps and documents. On 18 and 19 December 2018, focused research was pursued in the archives of the Jackson Hole Historical Society. This involved combing through the organization's collection of historic photographs, documents and newspaper articles. The interview with ski resort manager Ryan Stanley also served as a form of research, as he was asked about changes that have taken place there since the last study was completed several years ago.

The information presented below is intended to provide additional history and context covering the development and use of the Snow King Mountain Resort and its environs as they relate specifically to the purpose of the current Section 106 project. This material adds to the 2012 and 2014 studies, and was employed in the Conclusions section below to evaluate significance, integrity, eligibility and the potential impact of planned changes at the site. By and large, the new research materials collected substantiated the information and conclusions presented in the earlier studies.

ADDITIONAL HISTORIC CONTEXT

As mentioned above, both the USFS and WYSHPO agreed that there was no need to recreate the recent contextual materials for the Snow King Mountain Resort, particularly since the research and writing completed between 2012 and 2014 was professionally done and remains relevant today. The extensive historical information found in those documents was referenced throughout the course of the current project. Again, the reader is encouraged to consult that information for background on the site's history and development.

The following resources were researched because they are in close proximity and were largely absent from the earlier studies. They are addressed here solely to provide additional context for the current project and to answer some remaining questions about the ski resort and its nearby features. All of the references used to prepare this material are found in the bibliography section below.

Snow King Sports and Events Center – This large public building is just outside of the APE and eligible historic landscape boundaries despite its location in the base area in close proximity to the Summit and Cougar lower lift terminals. Archival research was conducted to determine when the building was constructed and whether it should be included within the boundaries for this project. The reason for its exclusion is that it was found to have been constructed in 1992 after the Town of Jackson engaged in five years of discussions, planning, fundraising and eventual construction.

The building was designed to replace the much smaller and reportedly deteriorating historic ski shelter that stood about where the lower terminal of the Cougar Lift is found today. The new building was placed within the original landing zone for the ski jump that once existed on the mountain but is now gone. Since its completion, the Sports

and Events Center has been used as a warming house for skiers and as an ice arena. The progression of community discussions and planning related to this facility's development was reported with some regularity in the *Jackson Hole News* between 1987 and 1992.

Phil Baux Park and Town Ballfield – The public park and ballfield are just outside of the APE and eligible historic landscape boundaries. They are adjacent to one another and are located in the area south of Snow King Avenue and east of Cache Street. This places these features north and northwest of the lower terminals for the Summit and Cougar Lifts, and below the Snow King Sports and Events Center.

The small park was named for longtime Jackson resident Phillip Baux, who was born in Iowa in 1914 and resided in Wyoming from the time he was a teenager. He owned Northwest Construction and during the 1970s appears to have built the Snow King Hotel and Conference Center and possibly other elements of the Rafferty Center. Active in civic affairs and respected in the community, Baux became a driving force behind the Teton County-Jackson Parks and Recreation Department. Phil Baux Park, named in his honor, appears to have been constructed during the 1980s. He died in March 1993 and was buried in nearby Aspen Hill Cemetery.

The ballfield has been in use since around 1945 and remains in use today. It was first improved in 1947 when floodlights were installed for night games. Starting in 1948, the field served as the venue for Jackson's annual Fourth of July fireworks show. The field was remodeled in 1973 with the installation of new chain link fencing and a backstop, along with a sprinkler system and restrooms. The dugouts appear to date from around that time and new lighting was installed the following year. During the winter months the field was used for ski parking and the adjacent grounds held an ice rink and tubing hill. Because the ballfield has been remodeled and is completely unrelated in both history and use to the ski resort's recreational development, it is considered an adjacent feature and excluded from the eligible historic landscape boundaries.

Aspen Hill Cemetery – This L-shaped property is located on the lower flank of Snow King Mountain east and southeast of the Snow King Sports and Events Center. It occupies the partially wooded grounds between the Sports and Events Center and the Rafferty Center, and is surrounded by ski trails to the east, south and southwest. In use since the early 1900s and possibly even earlier, what started out as a small unregulated burial ground with about 25 marked graves was officially dedicated as the town cemetery in 1920. That change resulted in the dedication of an internal roadway system and burial grid pattern throughout much of the site.

The cemetery continues to serve the community today and now holds more than 600 burials, among them the graves of a number of prominent former citizens of Jackson and Teton County. Largely overlooked in the 2012 report but addressed in the 2014 study, the site is mistakenly referred to in some locations in the document as Alpine Cemetery and in others by its correct name. The cemetery predates the development of skiing on Snow King Mountain and is wholly unrelated to the resort other than by

proximity. For these reasons, it is excluded from the APE and eligible historic landscape boundaries, instead being treated as part of the ski resort's setting.

CCC Trails – Discussed above under non-contributing resource 27, at the request of the USFS an attempt was made to locate information about the history of the CCC trails on Snow King Mountain. Research primarily took place in the archives of the Jackson Hole Historical Society Museum. Despite hours of reviewing newspaper articles from the 1930s, no mention was found of the trail system or any of the CCC's work in the area. The foremost publication on the topic is Michael Cassity's 2013 book, *Building Up Wyoming: Depression-Era Federal Projects in Wyoming, 1929-1943*. On page 131, the author mentions the presence of a CCC camp in Jackson during the mid-1930s and that the program, in general, built trails for the USFS throughout the state. However, details are scarce regarding the specific work that was done in Jackson and its environs.

David Gonzales' 2001 book *Jackson Hole: On a Grand Scale* states on page 34 that in 1936 the CCC "completed a zigzagging horse and hiking trail to the top of Snow King" and that the first ski race on the mountain took place along that same trail. While these facts are not disputed, the source of this information is uncertain as no corroborating records were found. The bottom line is that information on the CCC trails on Snow King Mountain remains elusive. Additional research beyond the limitations of the current project will be necessary to answer this lingering question and it is a topic worthy of further attention. The trails could be determined contributing in the future if additional information is located and more could be documented in the field about their alignment and surviving features.

CONCLUSIONS

The information and evaluation presented in the 2012 and 2014 studies has been supplemented and updated by the fieldwork and research completed for the current project to objectively reevaluate the site's age, integrity and significance. In addition, the recommended eligible boundaries presented in the earlier studies were reviewed and suggestions for refinements are provided below. Finally, all of the information gathered was employed for the determination of whether the current plans (as of March 2019) for improvements on Snow King Mountain will result in an adverse effect to any of its contributing resources along with the NRHP-eligible historic landscape as a whole.

Historic properties of all types and in all locations across the United States are evaluated for National Register eligibility based upon three primary criteria: age, significance and integrity. These factors are addressed here.

Age: The developmental history of Snow King Mountain Resort is discussed above and in greater detail in the earlier reports on the site. This extensive documentation shows that the north face of the mountain overlooking the town of Jackson has been used as a recreational ski area since the 1930s. Due to the effects of extensive development that occurred during the post-World War II era, the only contributing

feature dating from that early period is the mid-1930s CCC Summit Shelter. Most of the contributing historic resources associated with the ski area were built between 1946 and the mid-1960s, marking the resort's most intensive period of development. These include twelve of the ski trails along with the Panorama House and the Old Snow King Double Chairlift Unloading Platform. All of these features are within the historic landscape boundaries and contribute to its eligibility.

The only historic feature outside of the eligible landscape boundaries but within the APE is a segment of the access road up the back of the mountain from Leeks Canyon. Developed in the 1950s, this is part of the road network that has been determined to be non-contributing. The remaining developed features within the APE boundaries are found on the eastern edge of Snow King Mountain Resort. Associated with the Rafferty Lift, these include the upper length of the lift along with the trails it serves, including Moose, Flying Squirrel, Towers, and Snake River Run. All of these resources were developed during the 1970s and 1980s, and because they are too new and outside the period of significance, they have been determined to be non-historic. They are excluded from the eligible landscape boundaries specifically due to their status as non-historic resources.

In light of the NRHP guidelines, the area of Snow King Mountain Resort within the eligible historic landscape boundaries clearly meets the fifty-year age standard for a historic property, supporting its defined period of significance along with its overall landmark eligibility.

Integrity: This category of eligibility analysis requires evaluation of the resource, in this case the historic area of Snow King Mountain Resort, in relation to the question of its integrity as defined by the NRHP. According to the National Park Service's *Preservation Brief 36: Protecting Cultural Landscapes*, "Integrity is a historic property's historic identity evidenced by the survival of physical characteristics from the property's historic period."

While the period of significance for Snow King was established as 1935-1969 in the 2014 study, it is recommended that the end date be extended to 1971, pinning it to the year when the resort transferred ownership and became more corporate in nature. In other words, this change in ownership marked the end of the property's historic era and the beginning of modern changes that were to take place both on the site and in its surroundings over the following decades. While 1969 simply reflects a fifty-year mark, the use of 1971 provides a justifiable end date based upon a milestone in the property's historical development. In either case, the period of significance covers the same essential span of years and results in the same listing of both contributing and non-contributing features.

A cultural landscape is defined in *Preservation Brief 36* as "a geographic area, including both cultural and natural resources...associated with a historic event, activity or person or exhibiting other cultural or aesthetic values." Historic landscapes "are composed of a number of character-defining features which, individually or collectively contribute to the landscape's physical appearance as they have evolved over time." Four types of

cultural landscapes are defined by the document. Of these, Snow King Mountain Resort falls within the category of a historic vernacular (rather than designed) landscape. This is defined as a “landscape that evolved through use by the people whose activities or occupancy shaped that landscape. Function plays a significant role in vernacular landscapes.”

As a vernacular recreational landscape, there is no evidence to indicate that Snow King’s historic core was designed by a master landscape architect or design firm. Instead, it evolved during its period of significance through the combined efforts and effects of the resort’s changing ownership, land management and regulation by the federal government through the USFS, and by the many outdoor enthusiasts who recreated there and volunteered their time and labor to its development.

Another important National Park Service document that provides guidance on the subject of assessing integrity is *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes*. While this document focuses upon the identification, evaluation and designation of designed historic landscapes, it provides much that is applicable to the process of understanding and analyzing vernacular historic landscapes such as Snow King Mountain Resort. According to *Bulletin 18*, “The degree to which the overall landscape and its significant features are present today must be evaluated.” This is accomplished by asking the following questions: “1) To what degree does the landscape convey its historic character? 2) To what degree has the original fabric been retained? 3) Are changes to the landscape irrevocable or can they be corrected so that the property retains integrity?”

The primary question to be answered is whether the ski area retains enough of its important features to convey its historically significant appearance and associations. Specific features might include “spatial relationships, vegetation, original property boundary, topography/grading, site furnishings, design intent, architectural features, and circulation system.” A landscape doesn’t have to retain all of its original characteristic features, but enough must have survived “to make its historic character clearly recognizable.” The *Bulletin* instructs that this is done by comparing its present appearance to its historic appearance, keeping in mind that “a historic landscape need not exist today exactly as it was originally executed if integrity of location and visual effect have been preserved.”

From a larger, or macro, perspective, the character-defining features that prominently cause Snow King to be read as a historic vernacular landscape are its ski trails, which mostly consist of a series of open curvilinear clearings bordered and divided from one another by groomed stands of trees. These features were intentionally created and did not happen by circumstance. They are clearly evident from the base area, from multiple vantage points in town, and from a good distance north of Jackson. They define the face of the mountain as a ski area and have been present, largely in their current form, since the period of significance. Comparing historic photos from the period of significance with what exists today, it is possible to make out the same ski trails and stands of trees that remain there.

Looking at the resort from a micro perspective, it is made up of the individual ski trails along with a number of smaller resources that together form the whole. Some of these are contributing and others have been determined to be non-contributing. As historic preservation consultant Mary Humstone wrote in her 2012 report on the site, Snow King's character-defining features "include the mountain itself, ski slopes and trails, ski lifts, and hospitality and service buildings. The mountain and its ski trails retain integrity as character-defining elements of the cultural landscape that have shaped the image and character of Jackson Hole since the late 1930s."

To evaluate the integrity of any historic resource, seven qualities, or aspects, defined by the NRHP are considered. These are location, setting, feeling, association, design, workmanship and materials. As stated in *Preservation Brief 36*, "When evaluating these qualities, care should be taken to consider change itself. The reversibility or compatibility of changes should be considered, both individually, and in the context of the overall landscape." How well a historic resource compares to these factors answers the question of whether it continues to convey its historic character and significance despite changes that might have taken place during the years since it was developed and used for its original purpose. Over the past fifty years, changes have certainly occurred within the eligible landscape boundaries and within the APE. These include the removal of a few historic features, refinements to some of the historic trails, the introduction of a small number of short trails, construction of the Sports and Events Center, and the installation of new lifts.

The following provides brief analysis of the property in light of the seven aspects of integrity:

Location – Snow King Mountain Resort and its contributing resources are in their original locations dating from the site's period of significance between 1935 and 1971. Consequently, the ski area exhibits a high level of the aspect of location.

Design – This vernacular historic recreational landscape evolved over time during its period of significance, and it has continued to evolve further over the decades since. Because its historic area was not formally designed but emerged organically from the efforts of early owners, managers and skiers to create an enjoyable and challenging experience on the mountain, the aspect of design is less important than it would be if the resource had developed in accordance with a formal plan. Snow King as a whole continues to retain the vast majority of its early physical form, plan, space, structure and style. Despite the non-historic changes that have occurred, all of the contributing resources retain an adequate degree of their appearance and even design from the site's early decades. Consequently, the ski area exhibits a good level of the aspect of design dating from its period of significance.

Materials – The historic materials that were used to develop Snow King and that date from its period of significance largely consist of the mountain itself, with its natural landscape that was shaped into a ski resort. Groomed over time, the open clearings and stands of trees survive to this day. Despite alterations that have taken place, most of the materials used to construct the contributing buildings and chairlift platform also

remain in place to a degree that the buildings appear historic. Consequently, the ski area exhibits a very good level of the aspect of materials.

Workmanship – The historic work of grooming the landscape and shaping it into a recognizable ski resort remains apparent on the face of the mountain. The contributing buildings and chairlift platform also retain physical evidence of the construction techniques that were used in their erection during the site's period of significance. Consequently, the ski area exhibits a very good level of the aspect of workmanship.

Feeling – The ski area as a whole continues to evoke a particular aesthetic and historic sense of vernacular design and evolution. It unmistakably reads as a historic ski resort. Consequently, the ski area exhibits a high level of the aspect of feeling.

Association – The Snow King Mountain Resort continues to evoke its strong connection with the development of recreational downhill skiing in Wyoming during the period between the mid-1930s and very early 1970s. Consequently, this property exhibits a high level of the aspect of association.

Setting – Although some non-historic changes have taken place surrounding the historic landscape, particularly near the base along the developed town margin, Snow King's setting is still largely intact from its period of significance. Its physical relationship to Jackson and the surrounding alpine terrain is really no different than it was over fifty years ago. Except for the condominium building being constructed west of the lower lift terminals, the southern margins of the town have not intruded into the eligible historic landscape. Non-historic development of the Rafferty Center, the ski trails accessed by the Rafferty Lift, and the Sports and Events Center have resulted in some impact to the setting. However, the visual impact of these features is considered moderate in relation to the much larger scale of the historic ski mountain. In other words, their presence is not substantial enough to negate the ski area's overall eligibility. Consequently, it is determined that Snow King exhibits a reasonably good level of the aspect of setting.

In light of the NRHP guidelines, the area of Snow King Mountain Resort within the eligible historic landscape boundaries continues to retain and exhibit a preponderance of its visual appearance as a historic ski area dating from the period of significance. Consequently, it clearly meets the integrity standard for a historic property, supporting its significance and eligibility.

Significance: With the questions of age and integrity answered, the Snow King Mountain Resort was evaluated in light of the guidance provided by *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (1991, rev. 2002), *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes*, and with contextual material found in published sources such as Margaret Supplee Smith's *American Ski Resort: Architecture, Style, Experience*. Based upon these documents, the resource must meet the conditions of at least one of the following criteria to be considered eligible:

- A Associated with events that have made a significant contribution to the broad patterns of our history;
- B Associated with the lives of significant persons in our past;
- C Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction;
- D Yielded, or may be likely to yield, information important in history or prehistory.

National Register Bulletin 18 states that to be considered eligible, a landscape must retain an adequate level of integrity and meet at least one of the National Register criteria. Based upon field documentation and research, the landscape must be an “exemplary representative” of the property type, in this case a vernacular mid-20th century ski resort.

An important method of assessing the eligibility of a historic landscape, with its many individually contributing and non-contributing resources, is to take a look at the resource count. In her 2014 study, Kerry Davis argued that more than 75% of the individual component resources on the mountain contributed to the ski area’s eligibility and that this number was actually higher when the ski area was looked at from a spatial perspective. What she found was that the ski area consisted of 19 contributing resources that included 14 sites, 4 buildings and 1 structure. Among the non-contributing resources, she found 3 sites, 1 building, and 3 structures. In light of that balance, Davis concluded that the non-contributing resources failed to significantly impact the ski area’s overall visual and functional cohesiveness, and that it continued to read as a historic recreational landscape.

During the five or so years that have passed since the 2014 study was completed, a small number of additional changes occurred at the ski area. These include the demolition of a few historic resources and the construction of some new features. All of the resources on the site have been reevaluated during the course of the current study, resulting in a revised resource count. Comparison of the 2014 results with those from 2019 is presented in the table below.

RESOURCE COUNT

Comparison of 2014 Count and 2019 Count

| Types of Resources | 2014 Contributing | 2014 Non-Contributing | 2019 Contributing | 2019 Non-Contributing |
|---------------------------|--------------------------|------------------------------|--------------------------|------------------------------|
| Buildings | 4 | 1 | 2 | 4 |
| Sites | 14 | 3 | 12 | 9 |
| Structures | 1 | 3 | 1 | 3 |
| Objects | 0 | 0 | 0 | 0 |
| Totals | 19 | 7 | 15 | 16 |

What this table reveals is that the total number of individually contributing resources has decreased by about 22% due to demolition of the Base Drive Shelter and Snack Shack, along with re-categorization of the CCC Trails and Windbreak Terrace. On the non-contributing side, the number of resources has more than doubled. This is a factor of re-categorization along with the addition (at the request of the USFS) of several ski trails within the eligible boundaries, replacement of the ski lifts, and the construction of a new condominium building. However, these numbers do not tell the whole story.

Despite the negative trend of the resource count, Snow King Mountain Resort retains its integrity and NRHP eligibility. This is because the mountain still reads as a cohesive historic landscape and exhibits much of its historic character from a spatial perspective. Similar to what Mary Humstone found in 2012 and Kerry Davis concluded in 2014, the historic landscape continues to be dominated by the broad spatial array of groomed ski trails and forest, features that shape most of the mountain face. That particular arrangement laid out across the landscape remains visible from Jackson and its environs, and it continues to convey the history of the resource as a whole.

Based upon these facts, it is determined that *Snow King Mountain Resort remains eligible for the NRHP under Criterion A* at the local level in the area of Recreation for its association with events that have made a significant contribution to the broad patterns of our history. Its importance is tied to the history of downhill skiing in the Jackson Hole area between 1935 and 1971. *Snow King is also eligible under Criterion C* at the local level in the area of Recreation for representing a significant and distinguishable entity, a vernacular ski resort landscape, whose components may lack individual distinction.

Recommendations for Revision of the Eligible Landscape Boundaries:

Based upon the fieldwork and analysis provided during the course of this study, it is recommended that limited changes be made to a specific area of the northern boundary of the NRHP-eligible historic landscape, as it was defined in 2014 (see pages 32-34 in the Davis report). In 2014, the proposed boundary line cut through a corner of Aspen Hill Cemetery on a diagonal, with no consideration of the burial ground's property lines. The cemetery has no historic association with the ski area and is considered part of its setting. Consequently, the burial ground's legal boundaries should be respected.

In addition, the USFS has requested that the ski trails immediately south and east of the cemetery that were excluded from the proposed eligible landscape boundaries in 2014 be included. These trails are Kelly's Alley, Return Trail and Turnpike, and although historic they are determined to be non-contributing. This was discussed with USFS and WYSHPO staff, and it is recommended that the northern boundary of the NRHP-eligible historic landscape be redrawn to follow the cemetery's legal boundaries. This solution, clearly excluding the cemetery and including the ski trails, is reflected on the map on page 3 of this document.

Potential Impacts: The last subject to be addressed is that of the planned undertakings at Snow King and their potential impact upon significant historic resources and the property's NRHP eligibility. Details about these specific activities are found in a letter issued on 3 August 2018 by Forest Supervisor Patricia O'Connor with the USFS Bridger-Teton National Forest. The document, titled "Snow King Mountain Resort On-Mountain Improvements Project Proposal," presents discussion of "improvements proposed in Snow King's master development plan on National Forest System lands." Master plan documents dating from the past five years were also reviewed with the understanding that not all of the concepts presented in those plans are currently proposed. Finally, additional information about the current plans was provided to Tatanka Historical Associates during a telephone meeting on 7 March 2019 with Neal Artz of Cirrus Ecological Solutions.

The following undertakings are currently planned for the site, all of them to occur within the APE:

- A new ski school/teaching center on the ridgeline west of the Snow King summit.
- Development of skiing in the natural bowl on the back side, south of the Snow King summit.
- Removal of the Cougar Lift from the front of the mountain and its relocation to the back side to serve as Lift A.
- Removal of the service roads/skiways associated with the Cougar Lift from the front of the mountain.

- A 67-acre permit boundary adjustment on the front side, east of the existing permit area, to accommodate part of a summit access road/novice skiway, intermediate-level terrain lower on the slope, and a novice route down from the Rafferty Lift.
- An 89-acre permit boundary adjustment on the front side, west of the existing permit area, to accommodate a summit teaching center, another part of the summit access road/novice skiway, and expert-level tree and glade skiing.
- New ski terrain totaling about 97.5 acres (groomed runs and teaching terrain).
- Upgrading the existing Summit Lift to a gondola and installation of one new chairlift, two teaching area conveyors, and one surface lift. Also, the lower terminal of the Summit Lift would be moved to the current location of the Cougar terminal.
- Construction of on-mountain facilities, including the summit restaurant/guest services building and ski patrol facility, a temporary ski patrol building at the top of Cougar, an observatory and planetarium at the summit, a wedding venue west of the summit building, and a year-round yurt camp at the southern point of the permit area.
- 147.1 acres of added snowmaking (with few exceptions, all existing and proposed runs).
- Improved and expanded lighting for night skiing.
- Front-side mountain bike trails and a back-side mountain bike zone.
- Hiking trails between the summit and the west base, west of the Exhibition run.
- Installation of a zip line running from the summit building on a diagonal toward the northeast, terminating in the Rafferty base area.

Additional details regarding each of these proposed actions are found in the memorandum and recent planning documents.

Addressing the potential impacts of these actions, it should be underscored that the primary concern regarding the historic landscape's integrity and NRHP eligibility relates to the north face of the mountain. This is the historic landscape, from the base to the summit, that is not only visible from Jackson and the base area, but it also holds all of the ski area's contributing resources. Because the back of the mountain lacks contributing resources and is not visible from the north, improvements and changes there will not damage the site's eligibility. In other words, there is *no adverse effect* anticipated in relation to the following proposed actions in that area:

- Development of skiing, snowmaking and night lighting in the natural bowl on the back side, south of the Snow King summit. This includes relocation of the Cougar Lift to the back side of the mountain.
- Development of a back-side mountain bike zone along with a year-round yurt camp at the southern point of the permit area.

The north face of the mountain is more complicated because it holds all of the contributing resources and forms most of the eligible historic landscape. Several actions are proposed for the north face and their potential impacts are addressed here:

Proposed Actions Along the Ridgeline – Plans for the ridgeline at the summit of Snow King include the development of a new ski school/teaching center, a new summit restaurant/guest services building and ski patrol facility, an observatory and planetarium, and a wedding venue. If the Panorama House will be removed to make way for these new features, this will result in the loss of a contributing resource unless the SHPO determines that recent alterations have reached the point where it is no longer contributing. At the present time, demolition of the building would be considered a potential direct *adverse effect*.

Development of new recreational facilities along the ridgeline could potentially impact the historic landscape on the face of the mountain if they are highly visible from the north. Mitigation of impact will consequently depend upon how these features are sited and designed. For example, they could be set back south of the ridgeline and designed with low profiles. These characteristics would allow for their development while minimizing their visibility from the north. Because ridgeline features of any sort have the potential to be prominently visible, these facilities are considered to have a potential direct *adverse effect* and will need to be carefully planned to minimize or even avoid their visual impact upon the eligible landscape.

Proposed Actions in the Eastern Area of Snow King – Plans for this area include a permit boundary adjustment that would increase the acreage of the ski area to allow for the construction of a small number of additional ski trails along with a segment of a new summit access road. The issue of new construction and alteration to the access roads on the face of the mountain is addressed below.

Where new ski trails 3 to 7 on the scoping maps are to be located outside the boundaries of the eligible historic landscape near the Rafferty Lift, it appears that these will be separated from the eligible landscape by a buffer of trees. The eastern area of the mountain served by this lift has already experienced non-historic development, and the addition of short trails 4 to 7 on the lower flank of the mountain east of the lift should have *no adverse effect* upon the historic resource. These appear unlikely to be highly visible and their visual effect should be minimal. An additional ski trail, number 3, planned for the higher area between the ridgeline and the upper Rafferty Lift terminal would be located outside the historic landscape boundaries. Although also separated by a buffer of trees, this trail would be highly visible from the north and will have an

indirect impact upon the historic landscape. For this reason, planned trail 3 is likely to have an indirect *adverse effect* upon the historic resource.

Proposed Actions in the Western Area of Snow King – Plans for this area include a permit boundary adjustment that would increase the acreage of the ski area to allow for the construction and improvement of a small number of additional ski trails along with a segment of a new summit access road. This will include the installation of a teaching center at the summit served by new carpet conveyors B and C, along with a small area of forest glading near the top of the Bearcat Trail. Most of the new permit area will remain untouched forest. Again, the issue of new construction and alteration to the access roads on the face of the mountain is addressed below.

Activities planned for this area west of the Panorama House and outside of the eligible historic landscape boundaries will focus upon the grounds at and just below the summit where there is already a clearing in the forest. Glading will occur along the north edge of this clearing. Due to the mountain's topography, the activities proposed for this area will not be visible from the base but may be minimally visible from a good distance to the north. This should combine with the relatively small scale of the proposed features to mitigate their visual impact upon the eligible landscape. These proposed features are considered likely to have *no adverse effect* upon the historic resource.

Proposed Actions Within the Eligible Historic Landscape Boundaries – Plans for this area include a relatively small number of activities, some of which have the potential for substantial impacts to the historic landscape and others that raise little concern. One of these will involve removal of the non-historic Cougar Lift and its relocation to the back side of the mountain. Because the lift does not contribute to the historic landscape's eligibility, its removal will have *no adverse effect*. The Summit Lift will be upgraded to a gondola and its lower base moved about 200' to the north and downhill to the general area of the present Cougar terminal. Because this lift is also a non-historic feature and its new lower lift terminal will not negatively impact any contributing resources, the proposed changes will have *no adverse effect*. Current plans also call for the construction of a temporary ski patrol building at the top of the Cougar Lift. Although this building will be visible, it will be temporary and small in scale, making it likely to have *no adverse effect* upon the historic landscape.

The construction of proposed new ski trails 8 to 13, along with other substantial changes that might take place to the contributing trails within the eligible landscape boundaries could be problematic. As discussed above, Snow King has experienced the loss of several historic and contributing features over the past few decades and even in recent years. In addition, Upper Exhibition was constructed during the mid-1980s, resulting in an undeniably visible impact to the ski mountain. Completed at a time when the resort was not yet fifty years old, that project did not involve a Section 106 study. The continued loss of contributing resources and introduction of highly visible modern features within the eligible boundaries may ultimately diminish the site's NRHP eligibility. Consequently, the construction of new trails and major changes to the existing contributing ones beyond light grooming and maintenance activities would be considered a direct *adverse effect*.

Proposed Roads, Hiking and Biking Trails, and Other Features – The proposed plans for the area within the eligible landmark boundaries and the larger APE include work involving roads, hiking and biking trails, and other smaller features on the north face of the mountain. One of these activities will be to remove the existing service roads/skiways that are associated with the Cougar Lift along with other access roads that are no longer needed. Their grades will be restored as part of the removal process. These will be replaced by the construction of a single new summit access road that will wind its way up the mountain from the Rafferty base to the new summit building, passing through the eligible historic landscape along with the extended lease areas to the east and west. The face of the mountain is currently crossed by a network of visible road grades of varying ages, none of them found to be contributing resources. Removal and restoration of even some of these grades will likely enhance the landscape's natural appearance. Because the proposed changes to the roads will be minimally visible and may even enhance the historic landmark's integrity, this activity should not negatively impact the site's eligibility and will have *no adverse effect*.

Additional activities planned for the face of Snow King will involve the improvement of hiking and biking trails; construction of a new zip line running from the summit building on a diagonal toward the northeast, terminating in the Rafferty base area; increasing of snowmaking capabilities; and the installation of improved and expanded lighting for night skiing. All of these will involve smaller, visually lighter changes on the mountain. As long as they are planned and executed with sensitivity to their visibility, such as taking steps to make taller features such as lighting and zip line poles blend with the forest, they should have *no adverse effect* upon the eligibility of the historic landscape.



**Snow King Mountain from Jackson's Town Square
December 2018**

BIBLIOGRAPHY

- Allan, Esther B. *History of the Teton National Forest*. Published by the Author, 1973.
- Aspen Hill Cemetery, Jackson Hole Historical Society and Museum. Accessed on 12 December 2018 at www.jacksonholehistory.org.
- Birnbaum, Charles A. *Preservation Brief 36: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes*. Washington, DC: US Department of the Interior, National Park Service, 1994.
- Birnbaum, Charles A., editor. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. Washington, DC: US Department of the Interior, National Park Service, 1996.
- Cassity, Michael. *Building Up Wyoming: Depression-Era Federal Projects in Wyoming, 1929-1943*. Cheyenne, WY: Wyoming State Historic Preservation Office, 2013.
- Civilian Conservation Corps, USDA Forest Service, Bridger-Teton National Forest, Jackson, Wyoming. Located on 15 December 2018 at www.fs.usda.gov.
- Coleman, Annie Gilbert. *Ski Style: Sport and Culture in the Rockies*. Lawrence, KS: University Press of Kansas, 2004.
- Creation of the Bridger-Teton National Forest, USDA Forest Service, Bridger-Teton National Forest, Jackson, Wyoming. Located on 15 December 2018 at www.fs.usda.gov.
- Davis, Kerry. *Cultural Resource Investigation, Snow King Mountain Resort, Aerial Adventure Course & Chairlift Replacement/Extension Projects*. Preservation Solutions, 15 December 2014.
- Davis, Kerry. *Cultural Resource Investigation and Wyoming Cultural Properties Form, Snow King Ski Area*. Report Prepared by Preservation Solutions for Snow King Mountain Ski Resort, December 2014.
- Fife, Camille and Barbara Wyatt. *Key Definitions, Historic Landscapes*. Located at www.wyoshpo.state.us on 17 February 2019.
- Gonzales, David. *Jackson Hole: On a Grand Scale*. Boulder, CO: Mountain Sports Press, 2001.
- Historic Photographs of Activities on Snow King Mountain, Archives of the Jackson Hole Historical Society Museum, Jackson, Wyoming. (Note: serial numbers relate to year of donation and not dates when photos were taken)

Building Ski Jump at Snow King, Undated (1958.1854.001)
 Early View of Snow King Mountain, Undated (1958.1858.001)
 Skiing at the Top of Snow King Mountain, Undated (1958.1917.001)
 Hilltop View of Town of Jackson Looking Toward Snow King, Undated
 (1958.3104.001)
 Town Square with Snow King in Background, 1954 (1958.3351.001)
 View of Town of Jackson and Snow King and Chair Lift, Undated (1958.3398.001)
 Early Snow King Tow and Jump, Undated (1991.3962.001)
 View from Snow King to Northwest, 1992 (1992.4386.015)
 Ski Hill, 1960 (1994.6040.001)
 Chairlift, Undated (1998.0021.001)
 Chairlift, Undated (1998.0021.002)
 Chairlift, Undated (1998.0021.003)
 Construction, Undated (1998.0044.001)
 Skier with Race Bib Exiting Snow King Chairlift, Undated (1999.0032.001)
 On Snow King, 2014 (1999.0033.001)

Humstone, Mary. *Jackson's Town Hill: Snow King Ski Area*. Report Prepared by Humstone Consulting for the Teton County Historic Preservation Board, January 2012.

Jackson and Cache Creek, WY 7.5' Topographic Quadrangle Maps (1:24,000 scale).
 Washington, DC: United States Geological Survey, 1935, 1963, 1973, 1984, 1996.

Jackson Hole Guide (Jackson, WY)

"Big Fourth of July Celebration is Planned by Quarterbacks," 12 June 1958, p. 1.
 "SoftBall Begins Again," 19 June 1958, p. 12.
 "Teton Forest News: Fire Season Starts in Forest," 24 July 1958, p. 2.
 "Big Celebration This Weekend," 8 July 1965, p. 1.
 "Jackson's softball league plays games...", 16 June 1966, p. 1.
 "Due to the new grass seed being planted...", 20 October 1966, p. 21.
 "Jaycees' Fireworks," 2 July 1970, p. 4.
 "Pony League, Men's, Women's Soft Ball Forming," 1 June 1972, p. 7.
 "Notice and Call for Bids," 14 June 1973, p. 20.
 "Legal: Notice and Call for Bids," 10 January 1974, p. 13.
 "County Receives Recreation Grant," 28 February 1974, p. 12.
 "Hansen Proposes Cemetery Land Swap," 16 May 1974, p. 4.
 "Little-Leaguers Descend on Jackson," 25 July 1974, p. 3.
 "County Receives Grant Funds," 5 December 1974, p. 26.
 "New Diamond Eyed for Park Lights," 6 November 1975, p. 1.
 "Town Invites Bond Refunding," 20 November 1975, p. 3.
 "Town Budget Spurs Women's Soft Ball Diamond Dispute," 6 July 1976, p. 3.
 "Lopez Scraps Proposal to Move Phil Baux Park," 10 October 1990, p. 11.
 "Council Sees Plans for New King Shelter," 28 November 1990, p. 3.
 "Comments Sought for New Snow King Chair," 6 March 1991, p. 9.
 "Snow King Triple Chair OK'd by BTNF," 17 April 1991, p. 14.
 "Ski Shelter Parking Lot Draws Resident Protest," 8 April 1992, p. 3.

- "Reviewing the History of the Ski Shelter," 28 October 1992, p. 5.
- "Town Council Proceedings," 20 July 1994, p. 53.
- "Your Little Buckaroo," 21 May 1997, p. 103.
- "Tune Into Tube Time," 26 November 1997, p. 45.
- "Local Rinks Open for Skating," 31 December 1997, p. 43.
- "Snow King First of Local Ski Areas to Open," 22 November 2000, p. 45.

Jackson Hole News (Jackson, WY)

- "County Gets Check for Park Work," 28 February 1974, p. 15.
- "Bad Odds for Horsemen," 2 May 1974, p. 4.
- "Recreation Department Offers Full Summer of Programs," 27 June 1974, p. 8.
- "Welcome Little League," 25 July 1974, p. 16.
- "State Little League Play Opens Tuesday," 25 July 1974, p. 1.
- "Teton County Receives Federal Recreation Grant," 27 November 1974, p. 3.
- "Neighbors Halt Park Lights," 6 November 1975, p. 1.
- "Ladies Go Into Extra Innings," 21 July 1976, p. 1.
- "Rec Center Backers Need Study Money," 1 April 1987, p. 1.
- "Rec Board to Decide Snow King Plan," 3 October 1990, p. 6.
- "Revised Snow King Plans Gain Approval," 10 October 1990, p. 17.
- "Snow King's Changing Face," 20 November 1991, p. 1.
- "Commercial Development Long-Awaited, Even Cheered by Snow King Residents," 20 November 1991, p. 18.
- "Residents Angered by Ice Rink Parking Plan," 8 April 1992, p. 2.
- "Town Awards \$3.5M Ice Rink Contract," 22 April 1992, p. 12.
- "Town Council Proceedings," 29 April 1992, p. 34.
- "Town Council Proceedings," 13 May 1992, p. 33.
- "Services Held for Longtime Resident Phil Baux," 24 March 1993, p. 23.

Jackson's Hole Courier (Jackson, WY)

- "Youth Program Underway Here," 7 June 1945, p. 1.
- "Local Recreation Program Gains New Impetus," 17 July 1947, p. 1.
- "Lights Now in Operation at Recreation Field," 31 July 1947, p. 1.
- "Legion, VFW to Sponsor July 4 Fireworks Display," 1 July 1948, p. 1.
- "Plans Announced for Fourth of July Events," 30 June 1949, p. 1.
- "Softball Underway," 24 June 1954, p. 1.

Keller, J. Timothy and Genevieve P. Keller. *National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes*. Washington, DC: US Department of the Interior, National Park Service, circa 1985.

Smith, Margaret Supplee. *American Ski Resort: Architecture, Style, Experience*. Norman, OK: University of Oklahoma Press, 2013.

Snow King Mountain, 2017 Master Development Plan. Prepared by SE Group, December 2017.

Snow King Mountain Resort, 2014 Master Development Plan. Prepared by Ryan Stanley, General Manager of Snow King Mountain Recreation LLC, 21 October 2013.

Snow King Mountain Resort History. Located on 12 December 2018 at www.snowkingmountain.com.

Snow King Mountain Resort, Winter and Summer Trail Maps and Recreation Guides, 2018-2019.

Snow King Planned Resort District Master Plan. Town of Jackson and Teton County, 18 December 2000.

Tweed, William C. *A History of Outdoor Recreation Development in National Forests, 1891-1942.* Clemson, SC: Clemson University, Department of Parks, Recreation and Tourism Management, 1989.