

April 30, 2025



Dear members of the Water Quality Advisory Board,

On behalf of Protect Our Water Jackson Hole (POWJH), I would like to express our strongest sentiment that the creation of a robust snow storage management program is an essential step to improving water quality in our community. As you know, our valley is home to two impaired streams and a growing drinking water contamination problem. Undoubtedly, the contaminants we tend to think about most (sediment, nutrients, and bacteria) are dispersed through inadequate management of snow storage. Unfortunately, stored snow contains much more than these three contaminants.

We can look back at Teton Conservation District's 2013 sampling in Karns Meadow for a sense of some of the contaminants found in our stored snow: nutrients, salts, bacteria, sediment, metals, and hydrocarbons. We are pleased that the Town is taking a proactive approach to sample for PFAS in surface waters. Our community is lucky to have local research focused on environmental microplastic pollution. In Harmony Engineering's presentation to the Water Quality Advisory Board (WQAB) on 3/21, we were pleased to hear special attention paid to the trash and other undesirable contaminants in stored snow. However, as Lord Kelvin famously said: "When you can measure what you're speaking about, and express it in numbers, you know something about it..." In other words, it is imperative that we take a holistic and targeted approach to this issue so that we can take the appropriate actions to mitigate its harmful effects on our water.

Fortunately for us, we need not reinvent the wheel. There are other communities that we can learn from to inform local best management practices. For example, the state of Minnesota has terrific snow storage [guidance](#) found within their Minnesota Stormwater Manual. While we feel this entire document is worthwhile for staff and board members to review, there are several specific points that we would like to call attention to in this letter:

- Impervious surfaces and state-of-the-art treatment technologies should be utilized to mitigate contamination of groundwater and surface water resources.
- Snow storage should be restricted in areas with permeable soils or within setbacks from receiving surface waters.
- Upland sites, with slopes less than 6%, away from drain inlets, and downslope from contaminant sources, are preferred storage locations.
- Berms should be constructed to contain and direct snowmelt in storage locations. Berms present an opportunity for beneficial plantings (shrubs and conifers that are salt-tolerant are preferred) to be added to the site.

The notes above are a brief selection from a document full of important considerations. We request that you pay special attention to the Siting Recommendations section when reviewing the document. In addition, we urge the County to create a comprehensive monitoring program for contaminants found in our stored snow. Without knowing what contaminants are present, it is impossible to curtail their use (address the problem at the source) and alleviate their potentially harmful impacts once they enter the environment.

POWJH is grateful for the opportunity to continue working with County staff, WQAB board members, and other stakeholders to successfully implement the Teton County Water Quality Management Plan. Thank you for your work in service of our irreplaceable water resources and specific considerations regarding this important project to curtail pollution from stored snow. We can, and must, do better.

Respectfully,

A handwritten signature in blue ink, appearing to read "MB", is placed above the printed name.

Matthew Bambach
Water Resources Program Manager
Protect Our Water Jackson Hole