



Superior Highland Backcountry
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To:

May 28th, 2020

Constance Cummins, Forest Supervisor
c/o Michael Jimenez, Project Leader
Superior National Forest
8901 Grand Avenue Place
Duluth, MN 55808

Submitted online at <https://cara.ecosystem-management.org/Public//CommentInput?Project=52440>

From:

Eleanor King-Gallagher
Chairperson
Superior Highland Backcountry

Re: Lutsen Mountain Ski Area Expansion Project

Dear Constance Cummins,

I hope you and your family are well! I want to thank you for the time and thoughtfulness that you put into the consideration of projects such as this one.

I am writing to share the current status of Superior Highland Backcountry, our concerns regarding the Lutsen Mountain Ski Area Expansion Project, and the alternative proposal that we have developed for the acreage of the proposed SUP that lies on Moose Mountain. Also, I have reviewed the comment letter submitted by the Winter Wildlands Alliance (WWA), of which we are a member, and Superior Highland Backcountry is aligned with their stance on the proposed project.

Superior Highland Backcountry does not support the Proposed Action, does not believe the Forest Service should issue a Special Use Permit to Lutsen Mountains Corporation, and asks that the Forest Service consider our proposal for a backcountry ski area on Moose Mountain as an alternative for improving ski opportunities on the Tofte Ranger District.

Superior Highland Backcountry: Making backcountry skiing a reality in Northern Minnesota

After establishing ourselves under the fiscal umbrella of the national organization Winter Wildlands Alliance, Superior Highland Backcountry is now a federally recognized 501(c)3 non-profit organization, with a mission that states “to advocate for backcountry skiing and work to expand and protect human-powered ski opportunities in Northeastern Minnesota”. We remain a proud member of

the WWA, and continue to work closely with them on issues of advocacy that are relevant to the regional and national community of non-motorized winter sports enthusiasts.

For the past three winters, we have been working to develop and promote the concept of a hut-to-hut backcountry ski trail system, from Finland to Lutsen, along the highlands of Lake Superior. Being familiar with the industry, we are aware that many backcountry skiers reside in the Midwest and even in the Twin Cities Metro Area (WWA Comment Letter, p. 10, para. 3). It was our impression that, if people knew about the backcountry opportunities of the Arrowhead region, they would not only want to ski them, but they would also be motivated to support the development and maintenance of gladed backcountry areas, by direct donation or volunteerism. Now, through fundraisers and attendance of winter sports specific events, we find ourselves with an email newsletter subscription list of almost 300 people, with a total of 30 paying members, an active board of 5 members with two additional volunteers, and a volunteer roster of upwards of 60 people. This organizational growth has been in *anticipation* of our first project, which was first the Special Use Permit that we submitted to you in March of 2018, and is now a permit to glade for a backcountry ski area near Finland, MN, on land owned by Lake County.

In short, we have found that there is indeed an enthusiastic, dedicated community of backcountry skiers residing between the Twin Cities and Grand Marais. To our benefit, we are not in uncharted territory; on the East Coast, Granite Backcountry Alliance and Vermont Backcountry Alliance are well established and also grassroots organizations within Winter Wildlands Alliance. Our pre-project growth is very similar to theirs, and we can extrapolate that our projects will follow a similar trajectory as well. Both of these organizations have a fiercely dedicated volunteer and advocacy workforce, which is representative of the passion that the backcountry ski community as a whole has for our sport. With our first glading planned for fall of 2020 in Finland, we expect to see our organizational growth accelerate exponentially.

Superior Highland Backcountry is highly concerned about the possibility of this Special Use Permit (SUP) being granted. We are asking you to 1)Reject the proposal in its entirety, or 2)Consider an alternative proposal for a backcountry and/or sidecountry ski area. Our organization is asking you to include the following considerations in your EIS:

I. The Purpose and Need Statement as it is stated is incorrect.

The purpose and need statement of the Forest Service should be developed to determine what, if any, action the Forest Service needs to take, in order to serve the interests of the public. If the stated purpose of Lutsen Mountain Corporation's application is to improve their guest experience, the Forest Service's purpose and need statement should read: "The purpose and need of this action is to decide what, if any action to take, to improve the experience of skiers visiting the North Shore, and visiting Lutsen Mountain Resort in particular." This allows for a broader, more objective look at the needs and desires of the public, instead of the needs and desires of a private corporation.

II. Moose Mountain contains a finite resource, which cannot be monopolized by a single entity.

Quality backcountry ski terrain results from a combination of snowfall, slope, aspect, forest type and accessibility. Each one of these criteria needs to be adequately met to produce a quality backcountry ski experience; you cannot have good skiing without the convergence of *all* of these things. When this is fully understood, we see that Moose Mountain is *by far* the most unbroken acreage of the highest quality backcountry ski terrain in the entire state of Minnesota. Although the amount of acreage is a small percentage of the entirety of Superior National Forest(SNF) lands, the amount of the specific type of acreage, that is, ideal backcountry terrain, is the majority of that *type* of acreage on SNF lands.

On these grounds, **the SUP should be denied, because it would give sole usage of this limited resource to a single entity, while precluding the usage of the acreage by backcountry skiers.** Lutsen Mountain Resort already owns approximately half of the ideal terrain on Moose, thus, their access to this ideal terrain is secured. If they are denied the use of SNF land for traditional alpine ski development, they will still retain access to the ideal terrain that they own, with all of the opportunities that it has to offer. However, if they are granted their SUP, backcountry skiers will be denied their usage completely, of *any portion* of this most desirable ski terrain. Because Lutsen Mountain Resort already has the monopoly on a significant portion of this finite resource, their request for permission to use the remaining portion for an activity that would preempt all other uses should be denied.

III. The Expansion will greatly limit, or even preclude, the success of our hut-to-hut trail system.

For our hut-to-hut trail system to succeed and endure over time, it will need a requisite amount of visitation, to cover costs of maintenance through user fees and/or state or private funding. Including Moose as one end of our system will greatly increase the annual visitation and use of our trail system. Without Moose, with its expansive, ideal terrain, it is unsure whether our initiative will attract enough visitation to sustain itself over time.

It is worth mentioning here that the vision for a hut-to-hut system is at the heart of our members' enthusiasm. The spectrum of experience that a hut-to-hut trail system offers is *the main* inspiration of our membership.

IV. Gladed acreage in between traditional alpine runs is not comparable to a gladed backcountry or sidcountry ski area.

The gladed, undeveloped acreage included in the Ski Area Expansion proposal will not meet the criteria for quality backcountry skiing, as desired by our membership and the backcountry ski community.

1. The experience of backcountry skiing is only obtained from a large, unbroken area. In addition to the unbroken terrain, there are also the visual and auditory aesthetics that are only achieved in large undeveloped areas. Backcountry skiers are not satisfied by skiing in gladed areas that are in between traditional runs.

However, when a backcountry area abuts a resort, the result is a diversity in possible ski experiences. Those who wish to try out glade skiing without leaving lift access and groomed trail access can do so, and those who wish to access a more

undeveloped environment can also do so, by choosing to stay nearer to, or ski further out from, the resort boundary.

2. The edging effect of a clear-cut results in more underbrush, especially along the border area where the cleared area meets the undeveloped area. This results in significantly more maintenance to achieve skiable acreage. Conversely, without that maintenance, the acreage within the undeveloped islands remains inaccessible, unskiable, or both. (See VII. 2. (a) below.)

V. We are submitting a proposal for a Backcountry and/or Sidecountry Ski Area, to be considered as an Alternative in the EIS.

Superior Highland Backcountry has developed an alternative proposal for a backcountry ski area on Moose Mountain, which we are calling Moose Glades. The Superior National Forest should consider our proposal as a viable alternative. **I have attached a full copy of our proposal for record**, as it was submitted in March of 2018, and request that you consider one or both of the Alternatives, which are also summarized below, in the EIS.

Alternative #1 (A1): Stand-Alone Remote Backcountry Skiing

- 8 large interconnected backcountry glades through scenic mature sugar maple and boreal forest.
- Remote, scenic, and low noise skiing experience ensured by minimum 700-foot buffer from existing LMC Alpine Ski runs.
- Average slopes between 14.5 to 16.5 degrees with maximum slopes of 20 to 26 degrees.
- Nearly level return trail at base connects to switch back return trail.
- Switch-back return trail for self-powered cross-country ski return.
- Access via existing trails from Oberg Mountain Trailhead.
- Trails, cleared to 10' wide:
 - Base Trail: 1.2 miles
 - Switchback Trail: 1.9 miles
 - Ridgetop Trail: 1.0 miles
 - Access Trail: 910 feet

Alternative #2 (A2): “Side Country” Collaboration with LMC

Although we would prefer to see a stand-alone backcountry ski area on Moose Mountain, we also believe a “side country” collaboration with Lutsen Mountains Resort would be successful and beneficial to the public. Developing “side country” terrain in collaboration with LMC would involve:

- 8 large interconnected backcountry glades through scenic mature sugar maple and boreal forest.
- Average slopes between 14.5 to 16.5 degrees with maximum slopes of 20 to 26 degrees.
- Access to glades from the ridgetop trail connected to adjacent LMC ski lift.

- Return trail at the base gently sloping towards adjacent LMC ski lift for cross country or cat rides.
- Alternate switch-back return trail for self-powered cross-country ski return or cat ride to ridge top.
- Trails, cleared to 10' wide:
 - Lower Trail: 1.3 miles
 - Switchback Trail: 1.9 miles
 - Ridge top Trail: 1.3 miles
 - Return Trail on LMC Property, to Timberwolf Chair Lift: 1,063 feet

The light glading required to develop a backcountry (or side country) ski area would clear small saplings and brush from the understory that would otherwise inhibit downhill travel. All slash would be dispersed and laid flat and no piles will be made. All glade treatments would be done with the end goal of preserving the natural appearance of Moose Mountain.

Glade treatments for a backcountry ski area generally consists of thinning and clearing of all brush and saplings up to 6" in diameter at breast height. Under our proposal, no cedar or white pine saplings of any size, or overstory or canopy trees of any type, of any diameter, could be cut on the upper mountain. Additionally, small islands of saplings and brush would be left on the downhill side of mature trees. Mature trees (6" dbh or larger) within glades would be trimmed to remove all branches from the ground to a height of 12', in order to facilitate skier movement.

On the lower mountain, where forest density is thicker, our proposal includes removing select overstory trees as necessary to allow safe downhill skier travel and cutting select cedar and white pine of less than 6" in diameter, where these trees are growing in dense stands. In order to minimize glade treatments on the lower mountain (where more thinning within glades would be necessary, due to the thicker growth on the lower mountain), our proposed glades are wider on the upper mountain and narrower on the lower mountain. Funnel-shaped glades also help to direct skiers towards the base of the mountain and return trail.

Additionally, each glade would include a safe "run out" (flat section of a ski run at the bottom of a hill) 10-20' long and 12' wide for skiers to safely maneuver as they transition from the mountain terrain to the base/return trail. Finally, because trails within a backcountry ski area are winter use trails, intended for use when snow blankets the ground, no grading or ground disturbance is required - signs and flagging would mark trails as well as gladed runs.

If a backcountry ski area were approved for Moose Mountain, we would take responsibility for all planning, oversight, and execution of all aspects of the project, including, but not limited to, all initial glading and trail clearing, all ongoing glade and trail maintenance, promotional campaigns including safety campaigns, and public relations. In our Special Use Permit proposal, we described in detail how a backcountry ski area would be designed and implemented, as a 3-phase project done in part by insured contract workers, and in part by trail crews of volunteers, under the supervision and guidance of a qualified crew leader, on foot, using hand held tools.

Unlike the Proposed Action, a backcountry ski area would have very little environmental impact or impact on other uses. Moose Mountain would remain much as it is today, to be enjoyed in all the ways the public currently enjoys it, with minor changes to enhance backcountry skiing. With nearly zero development footprint and no permanent facilities required on National Forest land, a backcountry

ski area is a much lower-impact alternative to the Proposed Action. A backcountry ski area would provide new options for skiers of all abilities and would diversify winter recreation opportunities on the North Shore, drawing visitors and locals to recreate in Lutsen. The concept of a backcountry ski area is one that is gaining momentum nation-wide, with the nation's first backcountry ski area, Bluebird Backcountry, opening in Colorado this past winter.

VI. A Backcountry Ski Area adjacent to the resort, especially as one end of a hut-to-hut trail system, will meet many of the needs stated in the Purpose and Need section of the Story Map created by the SE Group for Lutsen Mountain Corporation.

Our proposal would meet many of the needs from the Purpose and Need statement of Lutsen Mountain Resort. It would also meet the needs of the Purpose and Need Statement of the Forest Service, if it were restated in a broader light, as outlined in point 'I.' above. Our proposal would achieve the following stated needs:

1. Add diverse and interesting terrain to the existing resort acreage
2. Improve skier circulation
3. Improve the quality of the overall resort experience as it compares to the destination resorts of the Mountain West, making the resort more competitive in the destination skier market
4. Attract a wider variety of guests, and new visitation, increasing overall visitation to the resort and improving their fiscal resiliency

VII. The need for additional acreage to improve the guest experience at Lutsen Mountains Resort should be questioned; the guest experience could be much improved on the current acreage.

1. Current operations are not being maintained to industry standards
In the purpose and need section of the overview prepared by the SE Group, it is referenced that:
 - a. "terrain variety is ranked second only to snow quality." Here it is worth relating that the quality of grooming on the traditional runs at the resort is consistently poor, and is often remarked on by experienced skiers. Simple grooming practices that meet well-known industry standards could be implemented. **Quality grooming would greatly improve overall snow conditions**, allowing for more sustained use of traditional runs, thereby **increasing the overall skier capacity of the resort's current acreage**. This is in contrast to the Resort's stated need for more acreage due to sub-ideal weather and steep headwalls. If snow conditions on groomed trails were better maintained, it would allow for more sustained skier circulation and higher overall skier capacity.
 - b. It is important to have a "well-developed trail system". There are several places on the existing access and return trails to and from Moose

Mountain that could be easily improved with better snow placement and/or short rope tows or moving walkways.


- c. There is a need to “improve skier circulation and reliable snow conditions”. There are several things that could be done about this within existing operations. There is a bottleneck at the Bridge Chair, which could be alleviated by installing a high speed lift there. Moose Mountain is currently served by a single chairlift on most days. Skier circulation could be improved with the more frequent use of the second existing chair lift, the replacement of that chair with a high-speed chair, and/or the addition of a third chair, in the place where the Bull Chair used to be.

As for snow conditions, in the absence of ideal weather, again, quality grooming practices could be implemented to greatly improve the daily quality of the groomed runs.

- 2. Current acreage is not being fully used.
 - a. The purpose and need states that to satisfy guests, the resort needs additional acreage to supplement their undeveloped terrain. The current undeveloped terrain that exists in between traditional runs is not being fully used. To be skiable in the existing forest type, this acreage needs “glading” which is routine thinning of small trees and brush. This is only being maintained on a few chosen runs. With maintenance, the remaining acreage could be serving skiers who desire this type of diversity.
 - b. The current runs on the north side of Moose are not being maintained. They were not opened at all during the season of 2019/2020, despite more than sufficient snow conditions.
 - c. There is acreage on Mystery Mountain that could be further developed into beginner and novice terrain. A system of access for an extension of the ski school could be established there as well.

I thank you again for your time and consideration in reading our concerns, and your thoughtfulness as you consider the action to take, if any, with this beautiful, valuable, unique area that we all cherish deeply.

Sincerely,



Eleanor King-Gallagher

Chairperson

Superior Highland Backcountry