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Comments: Please find the following comments on DEIS for Lutsen Mountains Ski Area Expansion Project #52440.

\*The DEIS failed to address the visual impact of the proposed development on the High Climber mountain bike trail. The impact from the High Climber trail viewpoints that looks towards Moose Mountain should be considered a Critical Viewpoints and the impacts to those viewpoints should be addressed in the DEIS. Due to the nature of the direct view and the large number of users and user days on the High Climber trail, these viewpoints are an important viewpoint for bicyclists and some of the best views from any mountain bike trail on the forest. The viewpoints also have a more direct view that that shown in Critical Viewpoint 3. Development on the northern side of Moose Mountain would significantly alter the views from the overlooks in a way that would fall below the Scenic Integrity Objectives of High or Moderate as described in the 2004 Forest Plan and the DEIS on page 98-99. One viewpoint is shown in the attached file (190925-381).

\*Failed to address the potential of wind events exposing the proposed chalet to Critical Viewpoint 3. The DEIS needs to provide data on how wind events affect intact forests and visual buffer strips, such as the one in both Alternative 2 and Alternative 3 that prevent the proposed chalet from being seen from Critical Viewpoint 3. With the increased wind events on the forest, they have the potential of a higher impact to Critical Viewpoint 3 than described in the DEIS.

\*Failed to address the economic impact to other Special Use Permit holders that guide hiking and photography workshops. Those SUP holders use the Critical Viewpoint 3 on Oberg Mountain. By marring the view, the value of those SUPs is reduced. This needs to be considered in the DEIS.

\*Failed to address the economic impact of increased electricity costs on senior citizens with fixed incomes, vulnerable populations, low-income families, and businesses. Arrowhead Electric Coop has stated that it will need to build a new substation to provide power to the development. They estimate a one percent increase in electricity costs to all of Arrowhead Electric Coop's customers.

\*The DEIS fails to quantify the number of users and user days at Critical Viewpoint 3. As stated in the DEIS, "Oberg Mountain is the most frequently visited recreation site on the SNF." We need to know the number of users and user days that would be impacted to be able to compare with the number of users and user days that would be adversely impacted by the marring of Critical Viewpoint 3 compared to the number of potential skiers that would benefit from the proposed runs. It would likely result in a higher number of users experiencing a reduced value of their experience and a net negative impact on the recreational value of the forest.

\*The DEIS failed to address the economic impact of rerouting the Superior Hiking Trail. Any reroute should be fully funded by the SUP applicant.

\*The DEIS failed to look at overall Midwestern ski trends. While participation in skiing according the 2020 Outdoor Industry Association Participation Report shows nation-wide skiing participation rates growing at 4.9%, skiing participation in the Midwest is contracting. The numbers used in the socioeconomics descriptions should be considered flawed based on where skiing is growing in the U.S. and where it is shrinking. The visitation increases used for the projections on page 122 to 125 should be considered beyond optimistic based on trendlines in the outdoor industry.

\*The DEIS fails to address the overall impact to the entire watershed. Minnesota is managing its water across the entire region according to its Lake Superior North One Watershed One Plan, and the USFS needs to incorporate that approach into the DEIS. By excluding the impact to the One Watershed One Plan from the DEIS, the USFS is failing to address the environmental impacts to other stakeholders in the county, including CCSWCD, Cook County, BWSR, MNDNR and the State of Minnesota. Considering the amount of money CCSWCD has already spent cleaning up erosion issues within the watershed of the proposed project, the impact will be significant to all these agencies and the Lake Superior North One Watershed One Plan.

Overall, due to adverse potential effects on the forest and area as currently described in the DEIS, I urge the selection of Alternative 1 - No Action Alternative.