

Data Submitted (UTC 11): 12/8/2021 11:00:00 AM

First name: Eleanor

Last name: King-Gallagher

Organization: Lutsen Recreation, Inc.

Title: Co-owner

Comments: Thank you for the opportunity to comment. My comment is attached.

Dear Mrs. Constance Cummins, 12/8/21

Thank you for the abundance of time and research that has been put into the Draft

Environmental Impact Statement (DEIS) for the proposed Lutsen Mountain Resort (LMR) Ski Area

Expansion Project. This document has helped me to understand the scope and details of the project and

the environment which it is being considered within, both natural and socioeconomic.

I am writing to request that you either select [ldquo]Alternative 1: No Action[rdquo], or develop an

alternative that does not allow the development of alpine runs or chairlifts on the [ldquo]front side[rdquo] of Moose

Mountain. To explain why I feel this is the decision that is in the best interest of the public and the most

consistent with Forest Service policy, I will present further information and anecdotal experience on

several topics, including alpine industry trends and backcountry skiing trends.

I would also like to request the further examination of several aspects of the process, including

the accepted 'need' of Lutsen Mountain Corporation (LMC) to use public land to meet their objectives.

I will do my best to organize my comments parallel to the structure of the DEIS.

#### 1. The Forest Service Process of Determining the Need of an Applicant

I am aware that in order to have a SUP application accepted, the applicant needs to demonstrate

that they cannot execute their project on private property, and that they are not simply asking for the

use of public land because it would be cheaper or easier for them. I would ask here for clarification:

does the Forest Service currently consider the LMC[rsquo]s Master Development Plan (MDP) as a whole in

determining whether or not LMC can meet their stated objectives without the use of Forest Service

land? I think it is necessary for the Forest Service to consider the stated needs individually, and not as

one indivisible project, when evaluating whether or not they could be accommodated on the current

premises or adjacent private land owned by LMC. While I understand that LMC has put a lot of time

into the development of their MDP, it is not in the interest of the public to assume that the entirety of the MDP is necessary for the project objectives to be met.

In analyzing LMC's stated project objectives alongside the DEIS, I believe that there are ways to meet the objective of [ldquo]improving the guest experience[rdquo], as well as LMC's individual identified needs

within that umbrella, without implementing the entirety of the MDP. Many of these involve improvements that can be made on their current or adjacent properties. I want to mention here that I am in agreement with LMC's stated need to improve their guest experience, and some of the deficiencies that they identify make sense to me.

Most specifically, I do not think that developing the front side of Moose is necessary to meet the project objectives. The terrain that would be added on Moose constitutes mostly Intermediate terrain, as can be deduced within the tables and maps included in the DEIS, and as is also apparent to those of us who ski at LMR. Then, the current skier density of LMR is well below the national average, which means that LMR does not need more space overall to accommodate their customers, or even to accommodate the moderate growth rate that one could project. That leaves us with the needs of [ldquo]increasing Beginner and Expert terrain[rdquo], including gladed terrain, and [ldquo]improving skier circulation[rdquo],

which I do agree need addressing in order to [ldquo]improve the guest experience[rdquo].

Finally, I would like to ask, does the Forest Service have a method for the unbiased evaluation, through cross-referencing, third party consultation, or other means, of whether or not a certain action will meet the stated objectives of an applicant? If so, what is that method? If not, how does the Forest Service determine, with any surety, whether or not the applicant can achieve their project on current or adjacent privately owned premises? I would like this examined, because it seems very subjective to simply ask the applicant, or their hired consultant, if an alternative approach would meet their needs, when the applicant clearly has a vested interest in declining the merit of alternative ideas in order to further the chances of permit approval.

In my next section I will highlight the ways that I have identified that LMC could meet their stated objectives without the use of SNF land, or by minimizing their use of, or impact on, SNF land within an SUP area.

## 2. Lutsen Mountain's Identified Project Objectives for Use of the Special Use Permit Area

### Introduction

When reading the DEIS section 3.1.2, The most outstanding statistic to me is the average skier density of 7 skiers per acre. This is consistent with my experience, and supports my opinion that LMC does not need to double their skier terrain, as a goal, in order to improve their guest experience, which is their stated overall goal. Further, this supports my opinion that the expansion of traditional alpine runs onto Moose Mountain is not necessary to meet LMC's identified project objectives.

Another fact that stood out for me was that LMC has experienced an [ldquo]overall positive trend[rddquo] of growth over the past ten years, and yet still has a desirable skier density, and could still accommodate further skiers without being anywhere close to the national average skier density. This further supports my belief that project objectives could be met with a combination of a much smaller SUP, expansion onto adjacent private land, and the improvement of current facilities. Thus, I will examine the project objectives individually, which I think could be met in this way.

I want to point out that my ideas for meeting the project objectives are informed by two current dominant alpine industry trends. The first one is the overall decline in participation. This can be understood in two ways. Firstly, there is an overall decline in skier visits as a recreational choice, when seen relative to U.S. Population growth. Secondly, and perhaps most importantly, there is a marked decline in annual visits per skier, which is tied directly to the demographic of age. Finally, the main reason that is given for the low rate of recidivism, that is within our control, is cost. It is now being understood in the alpine ski industry, that if we want to keep our sport alive, we need to make it more financially accessible to the upcoming generation. (Please see Appendix A: Compilation of Studies and Statistics That Outline Alpine Industry Trends for details.) LMR's MDP is not aligned or responding to these stark, prevalent trends, which are expected to continue into the foreseeable future.

However, there are ways to address the identified deficiencies in Beginner and Expert terrain, as well as skier circulation, which require much less investment and infrastructure, and would require the use of little to no SNF lands. I would ask the Forest Service to use their policy of disallowing use of SNF lands if the option exists to use private lands, to redirect LMR to expand onto their own property first. Being that the MDP lays out the proposed project in phases over 20 years, I think it is a very reasonable first step to direct them to develop their own property first. Then, after the use of private lands has been thoroughly exhausted, LMR, SNF and the public could consider if LMR needs additional land to fully meet the needs of their customers, and if that would be the best use of the SNF land.

I will now detail what I have identified as ways for LMR to meet their stated objectives mostly on private land.

#### Expert Terrain Overview

To address the deficiency of expert terrain, there are three things that could be done, without necessitating the alpine development of the front side of Moose. First, a chairlift could be installed on LMC's current property to serve the three expert runs on the back side of Moose, which could also then be extended down the hill to allow more of a run-out and a longer ski time. This would address the skier circulation issue relating to these runs (although personally, I enjoy the traverse back to the Caribou Express, or the long Moose Return Trail at the end of the day). Then, the density of runs in that area could be increased. There is also the potential for expert level gladed skiing in between the traditional runs. This would result in an additional 30 acres of expert terrain. (Please see Figure 1: Map of Acreage Available on LMR Property Backside of Moose and Mystery.)

It is worth noting that two of the three existing runs on the backside of Moose have not been opened at all for the last three seasons, even with the exceptional snowfall of the 2019/2020 season. An employee in the maintenance department at Lutsen Mountain told me this is because they either do not have the proper equipment or a properly trained employee to maintain the snow on such a steep pitch.

This makes sense to me, as the snow conditions on the north facing slopes in our region are often less than ideal. However, if LMC cannot maintain the current operation that they have in such terrain, they certainly should not be given access to similar terrain on SNF land.

Secondly, LMC could maintain the unused gladed tree skiing opportunities that they have on their current property. These can be readily observed in Figure 2 of the DEIS, where the current gladed areas are highlighted in bright green, and amount to 23.5 acres. The remaining areas in between the traditional alpine runs could be maintained in a similar fashion as the current 23.5 acres of gladed terrain, which involves clearing brush and thinning young saplings until a sustainable mature canopy forest type is achieved, which then keeps down the brush for minimal maintenance. I have personally skied in and out of some of these areas, and they would be quite ski-able for much of a typical season if this effort was put into improving them. One can estimate from Figure 2 that LMC could easily triple or quadruple their current gladed skiing offerings by using this acreage in this way.

Thirdly, the Forest Service could include acreage adjacent to LMC's western property boundary in an SUP, for the purpose of sidecountry skiing, in a quantity that could be used for this purpose. This is described in detail in the comment that I submitted for Superior Highland Backcountry (SHB), and includes a map with acreage calculated. I have included the map here as well for your reference; this would result in an additional 66 acres of gladed terrain. (Please see Figure 2: Map and Acreage of Minimally Maintained, Lift-served Terrain Available Adjacent to LMR Property.) This is a very common practice at other ski resorts; designing and implementing this would not be difficult. Furthermore, expert skiers often have equipment that can accommodate backcountry skiing, and so the availability of the rest of Moose Mountain should be factored into the analysis. SHB's growth will contribute to many more skiers seeking backcountry terrain, as is outlined in SHB's comment, and these skiers will have a lot of crossover with the expert skier customer base of LMC. In fact, the option of backcountry skiing would actually attract more expert skiers to LMR, as this is a highly sought-after experience for this particular customer. The DEIS should consider the construction of a [ldquo]backcountry gate[rldquo], which on Moose could consist of a sign that delineates the boundary of LMR, as a way to

address LMC's stated need for more expert terrain. The DEIS should consider the acreage available on SNF property on Moose Mountain, as part of the count of Expert terrain available to the growing percentage of expert alpine skiers who use alpine/backcountry convertible ski equipment.

#### Beginner Terrain Overview

For beginner terrain, I have identified the acreage on Ullr Mountain, east and north of the Big Bunny, which is owned by LMC. This would result in an area of 11 acres available in all, limited by the slope gradients and aspects of the hill, which could be cleared completely or designed into singular runs, and could also include novice level gladed terrain, akin to Charlotte's Web on Eagle Mountain. Then, Big Bunny could be redesigned to eliminate the "steep right-hand turn" at the bottom, referenced in LMR's materials as being difficult for some beginners. If desired, a small lift could be put in to service this area, which would eliminate the need to take the long traverse back to the Ullr lift each time, which I personally have found to be troublesome when teaching a new skier. (Please See Figure 3: Map of Available Beginner Terrain on LMR Private Land: Ullr Mountain.)

#### Mystery Mountain in Depth

Expansion on Mystery Mountain is listed in the DEIS as an alternative that was considered but dismissed, because "the terrain on Mystery Mountain would not provide the slope gradients required for adequate beginner and expert terrain needed to meet the project objectives" (Sect. A.2.5). I would like to provide more details here, on how the acreage on Mystery Mountain could be utilized to support not only beginner and expert terrain expansion, but also supply additional low intermediate to intermediate terrain, as well as assist in addressing the need for better skier circulation. I hope that these additional details, along with a high-quality map, will help to clarify the potential of Mystery Mountain to address the project objectives of LMR, when coupled with the other terrain additions that I have outlined in this comment, that are possible on LMR's property.

To begin, I have identified 161 acres of ski-able terrain in all, that ranges from beginner to intermediate, that could be designed into traditional runs. There is also the option of creating gladed

acreage within this area. Then, I have identified the possibility of creating a midway stop for the Gondola, which would be a good use of existing infrastructure, to access the new terrain. This would also allow the gondola to be used on windy days, and the additional terrain would remain accessible on those days, when the gondola currently is required to shut down completely due to high winds. If desired, a base chalet could be constructed there, which would help to address the deficiencies in indoor spaces during the busier times. Finally, if desired, an office for ski instructors could be included, to assist in the inadequate skier circulation and limited capacity for new skier instruction, which LMR has identified in their current operations. First time skiers taking lessons could easily take a gondola ride to get to their first hill; they may even enjoy this as an introduction to their new experience. This design would tie in nicely with the addition of the lift and additional terrain on the backside of Moose, as the two areas could share the infrastructure. Overall skier circulation would be greatly improved by this design. (Please see Figure 1: Map of Acreage Available on LMR Property Backside of Moose and Mystery.)

#### Eagle Mountain

I am in agreement that the large parking lot, skier circulation around Eagle Mountain, and specifically new skier lesson capacity and circulation around the ski school, could all use improvement. I have just outlined the option to move or expand the ski school to include the use of new terrain available on Mystery Mountain. Now I will examine the private land available on Eagle Mountain. In analyzing the proposal for Eagle Mountain, I was glad to see that two private properties are able to be utilized/traversed as a part of potential expansion, as these properties are owned by the owners of LMC. However, I do not see that LMC needs to use SNF land to address the above mentioned issues. If so, they could request permission for considerably less land, perhaps just to accommodate one or two runs traversing SNF land, as they ran from LMC property back to LMC property.

For parking, it is apparent to me when viewing the project map that LMR could expand their current parking lot onto their adjacent property to the east. In the DEIS, it is stated that this is not

possible [ldquo]due to topography[rdquo] (pg. 4, para. 5). However, when viewing the topographical lines on the project map, the topography adjacent to the current parking lot is not prohibitive to expansion.

Furthermore, the acreage that would be needed to construct a base chalet at the north end of that parking lot, which could include any combination of a ticket office, rental shop, and ski school, as well as providing space, if desired, for additional lockers, resting, and dining for guests, is also available on LMR property. This base building could feed guests into a new chairlift that would service Eagle Mountain, and also allow guests to park, acquire tickets and equipment, and proceed to walk across the road to enter the ski terrain via Bridge Run, or access the Moose Access Trail.

(Please see Figure 4: Map of Potential for Eagle Mountain Development on LMR Land.)

This building and additional parking as it would rest on LMC property may be smaller than the current proposed facilities, but as an addition to the existing facilities, I believe they would be sufficient. For instance, guests looking to use this building to rest or dine would likely be those in ski school or learning to ski with their family/friends, or families with young children that choose to stay on the new terrain on Eagle. Other guests may make use of the building for rentals and tickets, but would likely rest and dine in the current existing facilities on Eagle and Moose. The new construction building on Eagle could be designed accordingly. Also, as mentioned, LMC could still request permission to use SNF land for runs to traverse and perhaps for a bunny hill, which would result in a much lower impact on SNF property than the current proposal in its entirety. Finally, as mentioned in the final paragraph of my introduction of section 2, initiating moderate expansion, and then evaluating further need as time progresses, is a more prudent approach, especially at a time when the future of alpine skiing is somewhat unsure.

#### Additional Skier Circulation Not Already Mentioned

I wanted to provide one correction on this topic: in LMR[rsquo]s materials, as referenced during the first virtual open house hosted by the Forest Service, it was stated that the only existing access to Moose Mountain is the gondola. This is not true; there is also the Moose Access Trail, which many



guests use, in particular those who stay at Caribou Highlands and have access to the ski in/ski out option. I would request that you ask for clarification from LMR on this point, ask for an estimate of the number of guests who stay at Caribou Highlands on a given peak weekend and may be using this access, and add this to your assessment of current conditions, under Recreation, as it relates to skier circulation.

A main bottleneck of skier circulation is the travel back to Eagle/Ullr at the end of the day. This could be addressed in two ways within current operations: by amending the two traverses on the Moose Return Trail, which could be done either by adding rope tows or conveyors, or by making/moving snow in such a way as to eliminate those traverses, and by replacing the Bridge Lift with a high-speed lift.

With all of the opportunities for improving skier circulation outlined in this comment, I do not believe that LMR needs to use SNF land in order to meet their project objective: [ldquo]improve skier circulation[rdquo].

#### Facilities Summary

There are two more improvements that could be made to current facilities or on current LMR property, that would address LMR[rsquo]s stated need to increase the space available for guest services.

These are constructing a second story on the Summit Chalet, and renovate and continue to use their prior chalet, which is currently not being used at all. With all of the facilities improvements I have outlined in this document, including the base chalet/ski school on Mystery and the expanded parking and base chalet/ticket office/rental shop at the base of Eagle, I do not believe that LMC needs to use SNF land in order to meet their project objective: [ldquo]improve base area, parking, guest services, and operational facilities to meet the ever-increasing expectations of the local regional, and destination skier markets[rdquo].

#### 3. Scenery

I am requesting that you add to your catalogued Critical Viewpoints, or a more relevant section of Section 3.2 if there is one, the following scenic resource. I have identified a scenic resource in the

view from 61, as a passenger in a vehicle, beginning at 5783 Hwy. 61, and extending southward for approximately 1 mile, during the season when the leaves are down. The view from a vehicle as one travels Hwy. 61 is very significant to visitors and residents alike. As one views Moose from this stretch of road during this season, one is struck by all of its unique features; its prominence, uniformity, and seemingly endless expanse. Just north of this stretch, one is able to see the ski runs on LMR's property. While enjoyable for alpine skiers, ski runs have a definite, severe impact on the view of Moose. I request that you do not allow alpine runs to be developed on Moose, as this will retain the stark scenic view of the mountain in its natural state. Alpine skiers, for their part, are already able to enjoy the view of the ski runs as they approach Ski Hill Rd, and will still be able to do so. This results in an appropriate sharing of the unique scenic resource of Moose Mountain.

#### 4. Recent Infrastructure Decisions and Their Relationship to LMR's Current Stated Needs

In opening this section, I want to inquire, does the Forest Service have a method of considering actions that an applicant has taken within a span of recent years that have contributed to their current stated need for use of public land? If so, please see below. If not, I would request that you add to your process to allow for consideration and cataloguing of such actions.

I will now list several infrastructure decisions that LMR has made in the last 10 years that have impacted the resources or the deficiencies that they have identified in their Project Objectives, along with a reference to the specific stated need that the decision impacted.

1. Construction of Spa/Swimming Pool- Parking (built on prime parking spaces)
2. Removal of Bull Chair- Skier circulation and integrity of advanced intermediate/expert terrain (when skiing the lower headwall of Bull and skiing lower Grizzly Run, skiers need to tuck in order to make it back to the Caribou Express lift)
3. Clearing of Red Rider (now Lighthouse), Buckshot (now Holy Cow) and Cougar- Reduction of expert terrain
4. Not opening terrain available on the backside of Moose, even in adequate snow conditions-

Underuse of current expert terrain

I thank you sincerely for your time in reading and considering my comments and questions.

Please select an alternative that results in no construction of buildings, chairlifts, or traditional cleared runs on SNF lands.

Sincerely,

Eleanor King-Gallagher