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First name: Eleanor

Last name: King-Gallagher

Organization: Superior Highland Backcountry

Title: Board Chairperson

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

Dear Mrs. Constance Cummings, 12/8/21

I am submitting this comment on the proposed Lutsen Mountain Expansion Project, on behalf of Superior Highland Backcountry (SHB), as it relates to our mission, purpose, and the interests of our membership and user group. Our mission is [ldquo]To preserve and expand backcountry skiing opportunities along the highlands of Lake Superior.[rdquo] I have organized our comment into sections for your convenience.

Introduction

On page 76 of the DEIS, it is stated that SHB had [ldquo]an email newsletter subscription list of approximately 300 people, a total of 30 paying members, and active board of 5 members with two additional volunteers, and a volunteer roster of more than 60 people[rdquo], as reported at the time of the scoping comment period, in May of 2020. At the time of this writing, our email newsletter has increased to 382 people, and our paying members have increased to 119. This represents an increase of almost 300% over a period of 18 months, and is indicative of how much support there is, state-wide and regionally, for our mission. It is also a microcosm of the steep overall growth trend of backcountry skiing across the country.

When one researches the topic of growth in backcountry skiing, there is a vast array of articles, studies and references that confirm this trend, which build from about 2015 on. The factors that are affecting this trend are largely demographic, involving the younger generation looking for a more diverse set of experiences, exploratory activities, and finding that backcountry activities are more accessible for a wider income bracket of people. These trends are widely projected to continue, and we expect to see continued support for our organization, and an increase in backcountry skiing on the

North Shore, including Moose Mountain, as we develop our permitted, gladed Backcountry Ski Areas.

The first of these, Finland Glades, has been completed and will be open for use this season.

1. Requested Action

Both Alternative 2 and Alternative 3 would result in an irreversible and irretrievable

commitment of the unique terrain on Moose Mountain. The upper half of the southern face of Moose

Mountain consists of [ldquo]Sugar Maple Forest[rdquo], as cataloged in Table 3.7-4., on pg. 163 of the DEIS. This

is the most ideal intact forest type that we have found in our exploration of backcountry ski terrain on

the North Shore, due to the near-complete canopy that the forest develops when it reaches maturity.

This canopy limits undergrowth, making the area ski-able with very little amendment. Use of less ideal

forest types for backcountry skiing involves regular maintenance, including clearing of brush and

saplings, as well as the development and implementation of a forest treatment plan that expedites the

achievement of a full canopy. Due to the time span required to regain this forest type after it has

undergone clearing, this resource would be irretrievable for our user group.

I am requesting that you either develop an alternative that does not allow traditional cleared ski

runs or lift construction on Moose Mountain, or select Alternative A: No Action.

Or, a new alternative could be developed that includes permission to use 66 acres adjacent to

Lutsen Mountain's current property for the purpose of sidecountry skiing. This would include 32 acres

in a Sugar Maple forest type, which requires very minimal glading, and 34 acres in a more dense

conifer forest type, which requires heavy glading or the construction of [ldquo]braided lines[rdquo], a glading

technique designed to make an area skiable while preserving the integrity of the plant communities that

exist there.

No traditional clearing or lift construction would be allowed on this acreage, but glading could

be allowed, to improve the ski-ability of the terrain, similar to the runs on the eastern side of Moose,

which are currently maintained as gladed tree skiing. Then, narrow return trails that connect alpine

skiers back to the groomed trails could be allowed to be cleared and maintained. A good example of

this is the old mountain bike trail, which is at a good angle for traversing the hill on alpine skis. Figure

1: Map of Minimally Maintained, Lift-Served Acreage Available on Moose Mountain shows this

area. In this figure, the [ldquo]Caribou Lift Return Line[rdquo] and the Timberwolf Lift Return Line[rdquo] represent the

lowest trails possible to cut across the hill, that would allow for skiers with alpine equipment to make the traverse back to those respective chairlifts with ease.

This would meet Lutsen Mountain's stated need for minimally maintained lift-served terrain, while not compromising the remaining backcountry acreage on Moose Mountain. Please refer to section 4: Technical Information on Backcountry and Sidecountry Skiing to Supplement the EIS, for details on how this design would meet this need. Please see Figure 1 for a map detailing this acreage.

I would also like to request that the SNF consider continuous vertical slope as a limited resource, and consider the interests of the multiple user groups that value it, as a part of any winter special use permitting processes. Here I would like to highlight the USFS[rsquo] stated Agency Goal: to "Provide a diverse range of quality natural and cultural resource-based recreation opportunities in partnership with people and communities." This is also restated in the Forest Service[rsquo]s 2010 Framework for Sustainable Recreation. I would like to know, does the Forest Service consider all nearby recreational opportunities, whether on private, other public, or SNF land, when evaluating the decision to permit a project, as it relates to providing a diverse range of recreation opportunities? I think that this approach would be appropriate, as the owner/operator of a specific recreational opportunity does not weigh into the user[rsquo]s experience of their access to a diverse range of opportunities. I would request that the SNF use this approach when considering the impact of this project proposal on recreation.

It is my opinion that limited resources that are valued by multiple user groups should be shared in such a way that allows for equal access and use, not impacted by others' use. In this case, LMR and the alpine skiers that constitute their guests are currently able to enjoy the unique and limited resource

of Moose Mountain, on the existing resort on LMR property. The remainder of Moose Mountain should be considered as a limited resource which is desirable to backcountry skiers as well as alpine skiers, and the remaining acreage should be retained for backcountry skiers.

There are examples of these kinds of arrangements, specifically regarding winter outdoor recreation, that have been developed all across the country involving public lands. Winter Wildlands Alliance is a resource for bringing different user groups together to negotiate such land-sharing arrangements.

2. Impacts of Alternative 2 and Alternative 3 on SHB and our User Group

While it is true the proposed action on Moose Mountain would directly impact the skiers who currently use the area, there are further significant impacts that were not identified in the DEIS. The long-term vision of Superior Highland Backcountry is to construct a Hut-to-Hut trail system, with the initial terrain that we have identified between Finland and Lutsen. Hut-to-Hut USA (Mountaineers Books, 2021) author Sam Demas described the North Shore as the place that deserves a hut-to-hut system the most, of all the places that do not have one.

While there are several desirable locations along this stretch, Moose Mountain overshadows them all. Moose Mountain has almost twice the vertical feet of the next most prominent area and three times the acreage. Combined with the aforementioned mature forest type of the upper half, the consistency of the pitch across the entirety of the mountain, and the rugged terrain available as one approaches the base, these qualities result in a geological feature which is paralleled by none other across all of Minnesota. Moose Mountain, therefore, is considered the [ldquo]Crown Jewel[rdquo] of our developing Hut-to-Hut trail system.

The removal of access to Moose Mountain would have a significant impact on the success of our overall project; including Moose in our Hut-to-Hut system will retain interest and support that we may otherwise lose. This is due to the nature of the experience of the backcountry skier regarding vertical feet, as the experience varies significantly based on the length of the descent available, as well as the total ski-able acreage available on Moose, as larger acreage results in higher skier capacity per

snowfall. It should be emphasized that this is irregardless of our securing a permit to glade from the SNF, as I understand that such a proposal is outside the scope of this EIS. Moose Mountain, in its current state, would be a significant component of our Hut-to-Hut system, regardless of an SUP being granted to our organization.

In section 3.1.4 of the DEIS, the cumulative effects on recreation are analyzed. Here, projects that are included in Lutsen Mountain's Master Development Plan but have not yet passed environmental review are given weight and credence, when assessing the cumulative impact of Alternatives 2 and 3. Although I understand that [ldquo]evaluating a separate SUP application and operator is outside the scope of this EIS[rdquo] (section A.2.3, para. 2), if the EIS is going to include the possible future economic impacts of Lutsen Mountain's initiatives which have not yet passed environmental review, and were in fact actively removed from the original SUP application due to [ldquo]various resource constraints, including the presence of wetlands and potential for cultural resources[rdquo] (section A.2.1, para. 3), I believe that the cumulative impacts on recreation need to include the negative impact of the preclusion of a Backcountry or Sidecountry Ski Area as well. Please refer to Appendix A: Preliminary Economic Impact Study of Moose Glades Backcountry Ski Area for a summary of these impacts, and weigh them alongside the current cumulative impacts, including the potential positive impacts of Reasonably Foreseeable Future Projects as analyzed in section 3.1.4.

3. Skier Demographics and the Best Use of Public Land

It is worth noting that consideration of a project that will improve recreational opportunities for alpine skiers, while reducing recreational opportunities for backcountry skiers, is not in the best interest of the greatest portion of the public, when backcountry skiing is growing rapidly and alpine skiing is declining, and the trend falls along the demographic of age. Please see Appendix B for a collection of statistical documents that outline alpine skiing trends along age demographic lines.

When we analyze the changing consumer habits of the younger generation of skiers, looking forward, we can expect that a growing number of visitors to the SNF would prefer to have Moose

Mountain available for backcountry skiing, with the option of cost-free or low-cost use. These trends need to be considered as a part of the EIS, and need to be cross-referenced directly with the USFS' guiding principle of [ldquo]to provide the greatest good for the greatest number of people in the long run." Furthermore, preserving Moose Mountain for undeveloped recreation in no way detracts from alpine skiing opportunities along the North Shore. The existing terrain at Lutsen Mountains Resort will continue to serve alpine skiers seeking a resort experience.

4. Technical Information on Backcountry and Sidecountry Skiing to Supplement the EIS

Here I want to offer details in response to several references to our users and our activity, which were made in the DEIS, to improve the accuracy of the document.

In section A.2.4, footnote 1, it is said that sidecountry skiing is backcountry skiing that is accessed by a lift, but that the lift is not used for repeat access. This is not categorically correct, and in the case of Moose Mountain, sidecountry could be designed such that there are one or more points of return to the groomed trail and the chairlift. This would be achieved with the cutting of one or more minimally wide, angled traverse trails, along with signage that would clearly direct alpine skiers to exit the gladed area at the appropriate place(s). Please see Figure 1 for a map of the maximum acreage that could serve this purpose if properly designed.

On page 93 of the DEIS, it is stated that the backside of Moose would remain ski-able under Alternative 3. It needs to be understood that the backside of Moose is not normally ski-able in its current state, and would not become more ski-able under Alternative 3. The heavy tree cover combined with the steep pitch and northwest aspect of the north side of Moose make it not ski-able for backcountry skiers without a combination of significant alteration and ideal snowfall.

The same applies to the legacy islands that are incorporated into Alternative 3; due to the forest type that prevails on the lower half of Moose, these areas would not result in significant ski-able terrain for backcountry or expert alpine skiers, without at least minimal thinning, which would not be allowed as it would defeat the purpose of the legacy patch initiative.

In closing, I would restate my request that you either select Alternative A: No Action, or

develop an alternative that does not allow the development of cleared alpine runs or the construction of chair lifts on Moose Mountain. I thank you very much for your time, and the consideration of the great importance that this very singular geographical feature has to our organization, our members, and our user group at large.

Sincerely,

Eleanor King-Gallagher

Board Chairperson

Superior Highland Backcountry

Figure 1: Map of Minimally Maintained, Lift-Served Acreage Available on Moose Mountain

Appendix A: Preliminary Economic Impact Study of Moose Glades Backcountry Ski Area

Appendix B: Compilation of Studies Showing Changing Trend in Skiing by Age Demographic