

Data Submitted (UTC 11): 12/9/2021 11:00:00 AM

First name: Anon

Last name: Anon

Organization: Superior Highland Backcountry

Title:

Comments: 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 "To preserve and expand backcountry skiing opportunities along the highlands of Lake Superior." I have organized our comment into sections for your convenience.

#### Introduction

On page 76 of the DEIS, it is stated that SHB had "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", 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 "Sugar Maple Forest", 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 "braided lines", 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 "Caribou Lift Return Line" and the Timberwolf Lift Return Line" 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' 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'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'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 "Crown Jewel" 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 regardless 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 "evaluating a separate SUP application and operator is outside the scope of this EIS" (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 "various resource constraints, including the presence of wetlands and potential for cultural resources" (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 "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

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 "Alternative 1: No Action", or develop an alternative that does not allow the development of alpine runs or chairlifts on the "front side" 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'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 "improving the guest experience", 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 "increasing Beginner and Expert terrain", including gladed terrain, and "improving skier circulation", which I do agree need addressing in order to "improve the guest experience".

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 "overall positive trend" 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 "backcountry gate", 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 "due to topography" (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'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: "improve skier circulation".

#### Facilities Summary

There are two more improvements that could be made to current facilities or on current LMR property, that would address LMR'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: "improve base area, parking, guest services, and operational facilities to meet the ever-increasing expectations of the local regional, and destination skier markets".

#### 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

Figure 1: Map of Acreage Available on LMR Property Backside of Moose and Mystery

Figure 2: Map and Acreage of Minimally Maintained, Lift-served Terrain Available Adjacent to

LMR Property

Figure 3: Map of Available Beginner Terrain on LMR Private Land: Ullr Mountain

Figure 4: Map of Potential for Eagle Mountain Development on LMR Land

Appendix A: Compilation of Studies and Statistics That Outline Alpine Industry Trends