



May 13, 2020

Constance Cummins  
Forest Supervisor  
Michael Jimenez, Project Leader  
Superior National Forest  
8901 Grand Avenue Place  
Duluth, MN 55808  
[comments-eastern-superior@usda.gov](mailto:comments-eastern-superior@usda.gov)

**Re: Lutsen Mountains Ski Area Expansion Proposal**

Dear Ms. Cummins,

The National Ski Areas Association (NSAA) submits the following comments in support of the proposed Lutsen Mountains ski area expansion. NSAA is the trade association for ski area owners and operators nationwide. It represents 317 alpine resorts, accounting for over 90% of the skier/snowboarder visits in the United States.

NSAA and the U.S. Forest Service have a longstanding public-private partnership that makes outdoor recreation opportunities available to the public through ski areas operating on National Forest System (NFS) lands. That partnership helps facilitate the public's use, enjoyment, and appreciation of National Forests. Ski areas are a crucial component of the recreational activities offered on National Forests, and help meet increasing demand for outdoor recreation. Ski areas are also major employers and economic drivers in rural communities. While ski areas located on National Forest System lands accommodate over 30 million skier visits per year, they occupy less than one-tenth of one percent of NFS lands. NSAA is pleased to see the agency add another ski area to this public-private partnership. NSAA is confident that Lutsen Mountains will be excellent stewards of the lands and partners in recreation with the agency.

The Lutsen Mountains expansion will bring many benefits to the public, the agency, and the community. The project will provide additional terrain, with more diversity, as well as more amenities for much needed improvement. It will enhance the family experience at Lutsen Mountains. The expansion area is a small portion of the Superior National Forest, but will enhance the downhill skiing opportunities in the Midwest area of the country greatly. The project will provide tremendous recreation opportunities to the general public with minimal effects on the natural landscape.

For local businesses, this expansion will bring additional tourism to our area which not only provides local jobs, but also new revenues. Lutsen Mountains is one of the primary reasons that visitors come to Cook County in the winter. We think this project will be great for our community and the economy. We can't think of a better use of a very small piece of our public lands on the Superior NF.

This project can attract additional visitation to our area and help with our local economy – particularly in the challenging winter months.

### ***(Purpose and Need for project)***

Lutsen Mountains ski area is such an important amenity and provides a very unique and fun recreation experience for both locals and destination visitors. With all of the consolidations in the ski industry over the past decade, I/we agree strongly that improving the guest experience will ensure Lutsen Mountains competitiveness and survival in the Midwest ski area market.

I/we are very supportive of the project objectives and agree with the Forest Service that this project provides an opportunity to achieve the recreation goals outlined in the Superior NF land management plan. Expanding Lutsen on a small portion of the national forest also enhances socio-economic benefits to our area. There is a shortage of beginner and expert terrain at the existing ski area and constructing traditional ski trails and glade skiing as part of this project can address that deficit. I/we also agree that the project will significantly improve skier circulation and provide for more reliable snow due to upgraded snowmaking. Lastly, the proposed improvements in guest services, base area improvements, additional parking, etc., should address longstanding needs at Lutsen Mountains. I/we think this project, and the master development plan (MDP), are well designed and will transform the downhill skiing experience at Lutsen Mountains in a way that is environmentally and economically sustainable.

### ***(Project design and environmental effects)***

Support increasing and diversifying recreation opportunities in our area.

- Believe the socio-economic benefits from increased recreation such as more jobs and tax base are good for our community in both the short and long run.
- Outdoor recreation, and alpine skiing in particular, is a “clean industry” with very limited negative effects on clean air, clean water and other natural resources.
- Winter outdoor recreation opportunities help compliment the summer recreation that is so prevalent in northern Minnesota. Creating increased winter visitation helps provide year-round employment, tax revenue, and business in general.
- Approving this project helps the Forest Service implement the Superior NF land management plan and provides the American public with more uses of their public lands. This project helps the Forest Service deliver its mission.
- Excellent project design allows for rerouting both the local snowmobile trail and the Superior Hiking trail (a National Scenic Trail). Lutsen Mountains has agreed to coordinate with both the Superior Hiking Trail Association and the snowmobile association in the trail re-alignment projects.
  
- The economy of Cook County depends primarily, directly or indirectly, on visits from vacation homeowners and tourists. The recent COVID-19 stay at home

order has made this dynamic all the more obvious, with many job losses and many of our small businesses on the verge of not surviving.

- Summer is our strongest tourism season, with winter dependent to a large extent on visits from downhill skiers. Many of the businesses in our County, in fact, are not sustainable without the visitation by alpine skiers.
- With the many consolidations within the ski industry including the mega passes and capital improvements by the Western resorts, we believe that the proposed expansion by Lutsen Mountains is absolutely essential to the long-term survival of the ski area and health of our County economy.
- A strong and stable winter economy helps provide year around jobs for residents and promotes higher wages with benefits.

The Lutsen Mountains' excellent project design will avoid significant effects on old growth. We support continued close working with Minnesota DNR on both survey and mitigation to minimize potential impacts. Understand that wildlife surveys have either been completed, or are in progress, to identify important species and habitat in the area. Support working with both the Minnesota DNR and U.S. Fish and Wildlife service to minimize effects through project design.

- Support wildlife and believe that significant effects to species such as the gray wolf, Canada lynx, and key raptors such as the boreal owl can be avoided or successfully mitigated.

The project's design for ski runs, glades, lifts, and snowmaking system will minimize soil disturbance.

Expect that all Forest Service land management plan standards and guidelines will be enforced and significant damage to soils or watersheds will be very minimal.

Project design appears to already have avoided significant impacts to wetlands. Unavoidable impacts should be minimized and/or mitigated to meet applicable standards. Encourage and assume compliance with all regulations minimizing impacts on designated wetlands.

Best regards,

A handwritten signature in black ink that reads "Kelly Pawlak". The signature is written in a cursive, flowing style.

Kelly Pawlak  
President