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Comments: Lutsen Mountains Corporation (LMC) respectfully submits these comments in response to the release of the Lutsen Mountains Ski Area Expansion Project DEIS dated September 2021. As the proponent for this project, we have listened carefully to our guests, the community, local government representatives, Tribes and other key stakeholders to develop a proposal that best meets the increased demand at our resort and the recreation goals of the Superior National Forest. We believe our proposal continues LMC's tradition of providing outstanding recreational opportunities in a way that minimizes impacts to both our private lands and the National Forest System (NFS) lands and resources. LMC believes the Forest Service has prepared an outstanding DEIS and provides our comments in the spirit of cooperation and support for the proposed action, Alternative 2.

I.ALTERNATIVE 2, THE PROPOSED ALTERNATIVE

Lutsen Mountains is a family friendly resort that has been providing wonderful outdoor recreation experiences for over 70 years in northeast Minnesota. Due to the steady growth of our business, we have outgrown our current terrain and facilities. We are unable to sufficiently improve the guest experience at Lutsen Mountains on our private land alone and our proposal seeks to expand onto a small portion of the national forest. Our proposal, Alt. 2, will enable us to construct additional trails/glades and address the acknowledged deficit in beginner and expert terrain, improve skier circulation and reliable snow conditions, and improve base area, parking, guest services and operational facilities to meet the expectations of current and future guests.

LMC's proposal, Alt. 2, is designed to achieve the optimal balance of new terrain, base facilities, skier circulation and provide for skier safety. We believe these improvements will enhance the experience of our guests and help the Forest Service meet their mission and forest plan goals of enhancing outdoor recreation opportunities while protecting and sustaining the natural environment that makes our area special. LMC is committed to work closely with the USFS to encourage wider use of Lutsen Mountains and adjacent public lands by different racial and ethnic groups.

Additionally, LMC is committed to complying with best management practices (BMPs) to make sure all construction and maintenance activities minimize ground disturbance and are conducted to reduce, or eliminate significant environmental impacts. Permit requirements and BMP's will also, we believe, mitigate any water runoff impacts to landowners adjacent and downslope of the project. We look forward to working collaboratively with key agencies to maintain the health of the Poplar River watershed and any other watersheds potentially affected. This may include work towards controlling invasive plants as required.

Alt. 2 includes the most diversity of terrain and experience of any of the alternatives analyzed, partly because the north side of Moose Mountain would be accessible with lifts and ski runs. LMC believes that careful planning and site location for lifts and trails will allow development of this new terrain with minimal impact to: old growth, wetlands and trout stream at the bottom of the mountain, the Superior Hiking Trail, and existing snowmobile trails. Potential impacts to key wildlife species (including gray wolves, lynx, and boreal owls) are largely avoided in the design of the Alt. 2 proposed trails/lift as well. We also believe that the effect on the sugar maple forest and scenery will be less than Alt. 3, per the DEIS analysis. Potential effects of this project on the scenery were analyzed and documented in the DEIS, including potential effects for both daytime and nighttime operations.

LMC also supports the approach in the DEIS to consider potential effects to areas beyond the scope of this

proposal, including areas such as the Lutsen Scientific and Natural Area (SNA) and the Boundary Waters Canoe Area Wilderness (BWCAW), and only documenting these effects if they could be legitimately connected to the proposal.

The DEIS assesses potential effects on the project's viability due to climate change and finds that warming due to climate change is "Not anticipated to impact either the current winter offerings at Lutsen Mountains or the projects of the action alternatives." Additionally, the DEIS finds "the impacts of the projects on climate change would likely be imperceptible at the project scale and indistinguishable from other independent trends."

II.ALTERNATIVE 1, THE NO ACTION ALTERNATIVE WILL NOT ACHIEVE THE PURPOSE AND NEED

The No Action Alternative does not adequately address the Purpose and Need for the project and should not be selected by the Forest Service. The 2004 Superior NF Forest Plan identifies recreation goals that provide recreational opportunities on the national forest lands. In the Forest Plan, D-REC-3, states that one of the Desired Conditions is that: "the Superior NF provides developed sites, facilities, trails, water access sites, and other recreation opportunities…". Both action alternatives, help achieve this Desired Condition and address the increased demand experienced at Lutsen Mountains currently. Additionally, Alt. 2, and Alt. 3 provide these new and unique recreational opportunities on NFS lands at minimal cost to the Forest Service while also generating revenue for the treasury.

III.ALTERNATIVE 3

Alternative 3, was developed to meet the project's Purpose and Need, primarily by reducing and redistributing proposed developed areas - particularly ski trails/glades and lifts. This alternative eliminates the proposed new terrain on the north side of Moose Mountain and adds a reduced amount of terrain to the front side of the mountain. In so doing, Alt. 3 loses part of the uniqueness of the skiing experience and reduces the diversity of terrain that was featured in Lutsen Mountains proposal (Alt. 2).

As with Alternative 2, Alt. 3 also meets the Purpose and Need although with marginally less skiable terrain, jobs, and economic benefits. Should Alt. 3 be selected as the preferred alternative, the 34.3 acres of terrain added to the frontside of Moose Mountain (Pod 7) is critical for the project's success, especially with the elimination of terrain on the backside. Providing the additional beginner, intermediate and advanced trails with Pod 7 directly addresses the Purpose and Need for this project.

As in Alternative 2, the DEIS finds that warming due to climate change is "Not anticipated to impact either the current winter offerings at Lutsen Mountains or the projects of the action alternatives."

IV.CONCLUSION

LMC commends the Forest Service for conducting a thorough and comprehensive environmental review of this project. The DEIS reflects significant analysis, and careful consideration of reasonable alternatives. While LMC believes Alt. 2 best meets the purpose and need identified for our proposal, we also acknowledge that the Forest Service has done an excellent job developing Alt. 3 which also meets the purpose and need. We value the

Forest Service developing Alt. 3, which redistributes skiable terrain from the backside of Moose Mountain by adding Pod 7 to the front side. With Pod 7, Alt. 3 provides a reduction in the number of skiable acres - and also avoids the Superior Hiking trail, old growth and potential wetlands impacts - as compared to Alt. 2.

LMC appreciates also that the Forest Service continues to consult with the Tribes regarding Federal Land Access within the 1854 Ceded Territory. Concerns regarding the Tribes ability to exercise retained rights under the 1854 Treaty to hunt, fish and gather, and potential financial implications are identified in the DEIS and are similar for both Alt. 2 and 3. We are willing to meet and discuss these issues in depth with you. Please let us know what might be most constructive.

We are excited and hopeful to be at a point in our project development where the public can have an opportunity to see the potential for Lutsen Mountains resort. LMC appreciates the efforts of the Forest Service in reviewing and helping guide this project. We know that alpine ski areas located on national forest lands create a long-term partnership between the special use permit holder and the agency. We look forward to strengthening our partnership with the Superior National Forest over time and to working with you and your staff on this project.

Thank you for the opportunity to comment.