



*Classic Mountain Vacations on Americas North Coast*

*PO Box 129, Lutsen, MN 55612 [www.lutsen.com](http://www.lutsen.com)*

May 27, 2020

Forest Supervisor Constance Cummins  
c/o Michael Jimenez, Project Leader  
Superior National Forest  
8901 Grand Avenue Place  
Duluth, MN 55808

Re: Comments of Lutsen Mountains Corporation on the Forest Service April 28, 2020 Notice of Intent to Prepare Lutsen Mountains Ski Area Expansion Project EIS

Dear Forest Supervisor Cummins:

Lutsen Mountains Corporation submits these comments in response to the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Lutsen Mountains Ski Area Expansion Project. Lutsen Mountains recognizes the Forest Service for their efforts thus far in reviewing our Master Development Plan and the ski area expansion project. We appreciate the opportunity to comment at this stage of the process, and please add these comments to the administrative record. We are eager to continue to work with the Superior NF staff as this process moves forward.

Lutsen Mountains is a family run and family focused resort that has been providing wonderful outdoor recreation experiences for over 72 years in northeastern Minnesota. Over many decades, we have expanded our ski terrain and improved our facilities to meet evolving customer expectations. After all of these improvements, however, we have outgrown our current terrain and facilities. Our resort is located entirely on private land which, as you know, is adjacent to the Superior NF lands. We are unable to sufficiently improve the guest experience at Lutsen Mountains on our private land alone and seek to expand onto a portion of the national forest. This 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.

We believe these improvements will delight the skiing public 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. The project has been designed to minimize impacts on forest and biological resources. 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 minimize, or eliminate significant environmental impacts.

The Lutsen Mountains ski area expansion project is also designed to avoid and reduce potential impacts to key wildlife species (including gray wolves, lynx, and boreal owls), surveyed old growth in the area, and identified wetlands if present. In the several years before the FS environmental review began, Lutsen Mountains conducted its own environmental research of the lands involved and made many rounds of changes to our proposed ski runs and facilities in order to eliminate or minimize environmental or other impacts. We believe that the project has benefited from this research and changes.

Additionally, we are committed to limiting the potential effects on the scenic values in the area and addressing potential conflicts with other recreation uses – such as the Superior Hiking trail and existing snowmobile trails. We note that the Superior Hiking Trail Association has recently decided that it would rather re-route the SHT to a new route off of Moose Mountain instead of more minor re-routing on Moose Mountain that had been previously discussed. We support this objective and will work with the SHTA and the FS to achieve this goal.

Lutsen Mountains strongly supports the Forest Service's consultations with the Ojibwe Bands regarding the 1855 Treaty Rights and any concerns that the Bands may have. We understand that one of the Bands would like to harvest Maple Syrup on portions of this land once a road has been constructed and is also interested in possible retail sale opportunities for Maple Syrup. We support these and other endeavors consistent with the 1855 Treaty Rights and sound ski and recreational operating and safety considerations.

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. Lutsen Mountains appreciates the efforts of the Forest Service in reviewing and helping guide this project, and thanks the Forest Service in advance for its work preparing the EIS. 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.

Respectfully,

A handwritten signature in dark ink, appearing to read "Charles MS", with a long, sweeping horizontal line extending to the right.

Charles Skinner, Co-President  
Lutsen Mountains Corporation

cc: Constance Cummins

cc: Ellen Bogardus-Szymaniak