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Comments: I appreciate the opportunity to submit scoping comments regarding the Lutsen Mountains Ski Area Expansion Project.

Before getting to my project-specific comments, I first want to object that you are holding a 30-day comment period in the midst of the COVID-19 pandemic. The COVID-19 pandemic has made it extremely difficult for many people, including those without broadband internet access, to review and comment on the Notice of Availability and Proposed Action. This is a major development proposal and to move forward without any public meetings or opportunities for the public to engage directly and openly with the Forest Service and Lutsen Mountains Corporation (LMC) is unacceptable. The Superior National Forest should extend this comment period until after the pandemic has subsided and everyone is able to provide informed comments.

The Superior National Forest should not grant LMC a Special Use Permit to expand onto Forest Service land.

The proposed Lutsen Mountains Ski Area Expansion Project disrupts and threatens the future of silent sport opportunities on the North Shore. Moose Mountain is a valuable resource for hikers, backpackers, birdwatchers, star-gazers, and others who simply appreciate a long walk in the woods. This valuable resource needs to be shared. Given that half of Moose is already owned by LMC, the remaining public lands on Moose Mountain should be left for the public to freely enjoy. The iconic views of the Lake Superior shore are already compromised by ongoing development of its private parcels. A lease of an additional 300+ public acres for development would exacerbate this problem. Public wildlands in Minnesota are not as expansive as those in the mountains of the Western US, and therefore should be preserved in an undeveloped state for wide public access and enjoyment. Rerouting of the Superior Hiking Trail that would be required by this development would be a loss to the broader public for the benefit of a few, and particularly to LMC.

In addition, an expansion of the Lutsen ski area is not likely to bring new visitors to the region. While 700' of vertical terrain is impressive for Minnesota, it can't compete with the draw of Western resorts for destination skiers. Diversifying and supporting a variety of silent sports on the North Shore will draw new visitors, as well as preserve the incomparable North Shore views.

I understand that another competing interest for Moose Mountain is the development of a backcountry ski area. I don't support this proposed use either, as I have concerns about the ecological impacts of "glading" and other steps taken to smooth out and make the terrain safer for backcountry skiers.

The Environmental Impact Statement for this project should include an alternative that analyzes a leave it as it is option that values these public lands for their inherent ecological values as well as the ecological services and low impact recreational opportunities they already provide.