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Organization: Superior Hiking Trail Association
Title: Trail Development Director
Comments: Superior Hiking Trail Association (SHTA) Comments on Proposed Lutsen Mountains Ski Expansion Project and impacts to the Superior Hiking Trail / North Country National Scenic Trail

Location: Lutsen Mountains Ski Resort in Cook County, Minnesota | Superior National Forest - Tofte Ranger District

Background:
The Superior Hiking Trail Association is the nonprofit organization that builds, renews, manages, and protects the Superior Hiking Trail, a 300-mile natural-surface trail linking Wisconsin to an overlook of the Canadian border. An estimated 100,000 people use the Trail each year. The SHT provides the premier backpacking experience in Minnesota, if not the Midwest and it hosts many events, including the Superior Fall Race, one of the first 100-mile races in the nation. Hikers, runners, and snowshoers come to the SHT year-round to enjoy its remote setting.
The Superior Hiking Trail Association has long been aware of plans to expand the Lutsen Mountains Ski Resort. On January 16, 2018 SHTA executive director Denny Caneff met with Charles Skinner of Lutsen Mountains to discuss the project, and it was understood that they would pay for the cost of relocating the Superior Hiking Trail in the event of a ski expansion, although no agreement was made with Lutsen Mountains regarding the final route of the SHT.

In the fall of 2018, Jason Husveth of Critical Connections Ecological Services created a map for the SHTA that showed a proposed reroute following high ground north of Moose Mountain. This would remove the SHTA entirely from the Lutsen Mountains Expansion Project (see attached map).

Superior Hiking Trail Association Comments:
The SHTA does not oppose the expansion of Lutsen Mountains' area of operation and we acknowledge the likely benefits to the local economy from the expansion. However, we do not accept the route chosen for us in the Lutsen Mountains' Master Development Plan, which appears to have been laid out with more concern towards convenience and economy rather than the quality of experience for SHT users or sustainability. The SHTA represents the interests of tens of thousands of year-round trail users, and we have serious concerns about the negative impact that this development and the proposed route will have on the trail. We would like to point out these concerns about the route proposed by Lutsen:

?The new route will be confined to a swath of forest between cleared ski runs and chairlifts, and other major developments like a new Chalet and roads. It will completely alter the wild and natural character of the SHT that thousands of users cherish.

?There will be potentially significant impacts to trail use due to activities such as snow making, beginning in the fall, and skiing throughout the entire winter season. Fall is an extremely busy time on the SHT, and winter use is becoming increasingly popular. Any trail closure to the main SHT due to Lutsen Mountains' operational activities is unacceptable. Currently, the spur between the main SHT and Lutsen's gondola is closed for the months of November to June for safety. This closure is tolerable because it is only a spur trail that is primarily used by Lutsen visitors wanting access to the SHT from this point.

?The section of trail located at the bottom of Moose Mountain, and to some degree the lower sections of switchback (depending on layout) will remain not just wet, but saturated, well into the summer season because of the slow melt of the extensive snowpack caused by snow making activities all winter long, and the north-facing aspect of the slope. This will require the installation of expensive structures to make the trail usable. The SHT

suffers from this same issue at the bottom of slopes at Spirit Mountain in Duluth.

?The SHTA does not want to be subject to an extended trail closure while the project is under construction.

Based on the above concerns, we would request that the project not move forward until an acceptable route can be identified and approved, and that an agreement between the SHTA, Lutsen Mountains, and the US Forest Service regarding the payment and construction of that route be in place before proceeding. This route must:

?Be sustainably built to handle the increased traffic that this area will likely see due to Lutsen Mountains' expansion.

?Be sustainably constructed by a reputable contractor of the SHTA's choosing.

?Remain consistent with the SHT's wild, remote, and spectacular character.

?Be completed before construction on the expansion would necessitate a trail closure.

?Absolve the SHTA of responsibility to maintain any spur trail connecting Lutsen Mountains' gondola or expanded facilities to the main SHT route.

Attached:
Attached please find a map showing our preferred reroute.