Data Submitted (UTC 11): 5/14/2020 6:46:43 AM First name: Paul Last name: Gecas Organization: Title: Comments: Lutsen Mountains Ski Area Expansion Project

Dear Supervisor Constance Cummins,

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 express my disappointment 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 myself and many other 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 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 threatens the future of backcountry skiing opportunities on the North Shore. Moose Mountain holds the most unbroken ski-able vertical feet in Northern Minnesota and is a valuable resource for backcountry skiers. Vertical feet of skiable pitch is a finite resource in our region, and needs to be shared. Given that half of Moose is already owned by LMC, the public lands on Moose Mountain should be left for everybody else to enjoy.

Rather than granting LMC a Special Use Permit, the Superior National Forest should consider the development of a backcountry ski area on Moose Mountain. I support Superior Highland Backcountry's vision for a Backcountry Ski Area on Moose Mountain and believe this would be a better use of these public lands. An expansion of the same old type of ski area is likely not going to bring any new visitors to our region. No matter how much Lutsen expands, the fact remains that there is only 700' of vertical terrain. While this is impressive for Minnesota, it can't compete with the draw of Western resorts for the destination skier. However, diversifying the variety of winter sports available in northern Minnesota will draw new visitors. Backcountry skiing is the fastestgrowing segment of the ski industry, and adding a backcountry ski area to the mix of winter opportunities already available in Lutsen will entice more people to visit the area and strengthen the economy.

The Environmental Impact Statement for this project should include an alternative that analyzes a backcountry ski area, as proposed by Superior Highland Backcountry.

Sincerely, Mr. Paul Gecas 1020 W 3rd St Grand Marais, MN 55604 gecas.paul@gmail.com