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Comments: To whom it may concern,

As a long time skier and ski patroller who routinely skis at Lutsen Mountain, Spirit Mountain, and in the Western Rockies, I oppose the Lutsen Mountain expansion for several reasons and am asking that you deny permission. I have several concerns with the proposed EIS.

The proposed need statement does not consider that skiing/snowboarding are declining in large part due to how expensive it is. Window lift tickets have more than doubled in the past decade further restricting access for most people. Many ski resorts on USFS in western states are having to combine in order to stay in business. The only area of growth in the ski industry has been in backcountry skiing.

Since Lutsen Mountain announced their expansion plan the management has been aggressively trying to stop skiers from skiing what is the proposed expansion area on Moose Mountain. They have a policy whereby the ski patrol is tasked with policing anyone who accesses public land and skis outside the resort. Anyone who violates this has their lift pass taken away by the ski patrol. This is not the ski industry norm. Most ski resorts that are adjacent to USFS land allow skiers to exit and reenter the resort. This shows that Lutsen is actively trying to suppress the number of backcountry skiers to bolster their claim that it is not popular activity.

Lutsen cites an objective claim from In Ski Magazine Reader that "terrain variety" as a justification for expansion. Lutsen already benefits from having the most terrain of any ski resort in the Midwest. There are no direct competitors to Lutsen Mountain. Other nearby resorts such as Giants Ridge and Spirit Mountain have expanded mountain biking for a host of reasons. As for progression terrain at one time Lutsen had an easy way down that head wall at the Caribou Lift on Moose Mountain, but removed it and replaced it with a more difficult run. Lutsen could do more with existing infrastructure to make it more appealing to skiers. The Caribou Lift is heavily used because it is the fastest lift at the resort. Replacing two lifts on Eagle Mountain with larger and faster lifts would alleviate the skier pressure on Moose Mountain.

Privatization of public land for a niche seasonal activity is not a wise use of the resource. Increasing mountain bike trails and/or backcountry skiing in this location would be a better use and allow more people to participate and engage with the land. Mountain biking and backcountry skiing would also have a much smaller footprint on the landscape rather than clear cutting large sections forest for a ski run, paving a parking lot, build a chalet, several chair lifts, and snow making retention ponds.

The EIS does not take into account climate change and what its impacts are on the ski industry as a whole when justifying the need for the expansion. Winters will continue to become warmer and shorter. This means fewer skiable days in the year. Lutsen Mountain currently cannot make enough snow to cover their current runs. This is in large part this is due to warmer air temps in the winter months, which is only going to increase. Climate model predictions have northern Minnesota winters liken to that what is current day Illinois by mid-century. More snowmaking equipment will increase Lutsen Mountain's carbon footprint. The EIS also fails to take into account large amount of energy that it takes to make snow.

In conclusion, the privatization of public land for a recreational activity that is in decline for a multitude of factors that include warming and shorter winters, fewer skiers/snowboarders overall, restricts use of public lands, and with little evidence that supports such an expansion is not wise use of public land or long-term economic viability of the region. There are better and less impactful options the USFS could allow that include backcountry skiing and new uses such as mountain biking. Please do not approve the proposed Special Use Permit for a Lutsen Mountains Resort expansion. Leave the terrain and our public lands the way they are.

Thank you for your consideration