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Comments: I have strived to approach this permitting process with an open mind and not default to a kneejerk reaction to the scale of this proposal, but the more I learn about the implications of the special use permit and the expansion plans, and how thin and disingenuous the justifications are, I can only support the No Action Alternative out of those offered for this project.

I have lived and worked in Cook County for parts of the last 15 years and I appreciate the role that Lutsen Mountains plays in the local area, and I would be willing to support a reasonable and practical expansion on public lands if LMC could clearly demonstrate the demand and benefits, but this proposal does none of those things.

First and foremost, the infringement on treaty rights, as outlined in section 3.5 of the DEIS, violates the terms of the 1854 Treaty, and given the objections raised by the Grand Portage Band, the only allowable outcome is the No Action Alternative. As described on page 144, two-thirds of 1854 treaty territory's original 6 million acres has already been lost to other hands, so any further degradation or limitations affecting treaty rights, no matter what proportion of the remaining land area is impacted, cannot be permitted.

The DEIS also addresses irreversible and irretrievable effects on resources, claiming that any development could be undone through reforestation and restoration of the landscape. However, these sections make no mention of how that would be accomplished or who would be financially responsible. It is reasonable to assume that if the project were developed and later abandoned, creating the need and opportunity for rehabilitation, this would most likely occur due to the financial collapse of the permittee. It is certainly not in the public interest to risk leaving this expense to public agencies.

The scope of this proposal is far too extensive, and it is not appropriate to commit nearly 500 acres of public land to an expansion that is significantly larger than the entire existing operations of LMC. There is simply no defense that this project would be in the public interest, and the SUP must be denied.