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Oct. 21, 2021

Constance Cummins  
Forest Supervisor  
C/O Michael Jimenez  
Superior National Forest  
8901 Grand Avenue Place  
Duluth, MN 55808

Dear Supervisor Cummins:

We write to offer our comments in support of the Lutsen Mountain Ski Area Expansion proposal. Thank you so much for the opportunity to comment. Thank you as well for the professionalism with which the Superior National Forest staff has managed evaluation of Lutsen Mountain Corp.'s Special Use Permit application.

While the Superior National Forest staff has captured the deficiencies in the Lutsen Mountain operation that stimulated development of this proposal, we suggest the situation is more urgent than the description of deficiencies suggests. Indeed, expansion is an existential question not only for Lutsen Mountains but also for the Cook County economy.

For Lutsen Mountains, the imperative is to either grow or slowly die – as so many small ski resorts have died because they could not afford the technological upgrades, facilities improvements and ski terrain modifications that skiers demand and the industry giants – especially Vail Resorts and Alterra Mountain Co. – have the wherewithal to provide.

It would be a mistake to compare Lutsen Mountains to most other ski areas in Minnesota or the Midwest. At five hours from the Twin Cities, Lutsen Mountains is a skiing destination, not a day excursion. Its primary competitors are the large western ski resorts owned by the industry giants. The challenge is to persuade midwestern skiers to choose Lutsen Mountains. The large companies which own those western resorts continuously invest huge sums in the most modern technology, upgraded facilities and terrain modifications that respond to the latest skiing and snowboarding advances. As a small, family-owned ski resort, Lutsen Mountains will never be as large as any of those western resorts, but it must be able to offer the varied terrain and up-to-date facilities that can lure substantial numbers of families into taking a five-hour road trip rather than boarding a plane and heading west.

We are grateful that Lutsen Mountains has accepted the challenge to survive through growth – and to take on a heavy debt load to make that growth possible. Our economy depends on it. Residents of Cook County are almost totally dependent on a highly seasonal tourism economy. But the summer season at this latitude is just five months long. And it is difficult to gain sufficient revenue in five months to survive the remaining seven. Typically, our West End businesses where Lutsen Mountains is located cover 75-80 percent of their costs with summer revenue. The remainder of the revenue to cover costs, and any profit, come from serving clients mostly brought to the area for the winter downhill skiing season at Lutsen Mountains. Losing Lutsen Mountains – a likelihood in the coming years without this expansion – would put many of our businesses at risk and create a substantial, long-lasting drag on the entire Cook County economy.

It is clear that the Superior Forest staff prefers Alternative 3, which it designed, over Alternative 2, developed by Lutsen Mountains. There appear to be two principal reasons for that preference: protection of a growth of northern white cedar on the western slope of Moose Mountain and eliminating the need to move a short portion of the Superior Hiking Trail.

As the EIS for this project reports, the Northern White Cedar is an important tree to the Ojibwe people, and the acreage under question falls within the boundaries of the 1854 Ceded Territory. But as the EIS also reports, the 66 acres of northern white cedar affected by Lutsen Mountains' proposal equals just 17 hundredths of 1 percent (.0017) of the 38,348 acres of northern white cedar within the 1854 Ceded Territory.

Were the Ojibwe people and Lutsen Mountains both seeking use of this 66 acres of cedar, certainly the rights of the Ojibwe people under the 1854 treaty would require deference. But there is no evidence that the Ojibwe people have ever used or ever plan to use this specific growth of northern white cedar in any way. We respectfully suggest it is unreasonable to prohibit inclusion of this small cedar acreage in the ski-area expansion – on land the Forest Service has designated for recreational use – because of a remote chance it might at some undefined future date become a focus of Ojibwe gathering.

Superior Forest concern for moving a short segment of the Superior Hiking Trail at the top of Moose Mountains similarly appears exaggerated. While a wonderful recreational resource, the Superior Hiking Trail route changes frequently along its length. Moreover, if aesthetics are the chief concern, we would respectfully ask why a very different standard was applied to the recent logging project on the Superior Forest along the trail between Cook County Road 6 and Sundling Creek.

The EIS also mentions a desire to preserve “legacy patches for sensitive forest communities” on the east slope of Moose Mountain. If this portion of Alternative 3 is included in the final project – or if Alternative 3 is chosen in its entirety – please ensure that all of the additional ski acreage added to the southwest corner of the project in Alternative 3 be included, along with Lift 7. This acreage and lift are essential to help compensate for the loss of steeper terrain from Alternative 2 and the constriction of routes down the mountain, concentrating skiers on fewer routes and diminishing the ski experience.

Lutsen Mountains Corp. and the people of Cook County have a great deal riding on your decision regarding this ski-area expansion, which has been seven years in the creation – seven years during which the competing western ski resorts have continued to grow and to invest hundreds of millions of dollars in the newest terrain and facility advances.

As the EIS itself demonstrates, the Lutsen Mountains expansion was developed with a keen eye for minimizing negative environmental impacts while providing visitors with opportunities to fully enjoy the splendor of the North Shore in winter. We ask that you give great weight to the preferences of the family that will finance this expansion and literally put the future of their company on the line to make it work. The potential negative impacts from deferring to the company's vision are exceedingly small.

Respectfully,

Jim Boyd  
For the Chamber board