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Organization:

Title:

Comments: Lutsen Mountains Ski Area Expansion Project, MN DNR Comment Letter

Good Afternoon,

Attached, is the MN Department of Natural Resources comment letter for Lutsen Mountains Ski Area Expansion Project, Draft EIS.

Please refer to contact within the letter for questions.

Thank you,

Jodi Perkio

Regional Office & Administrative Specialist | Division of Ecological & Water Resources

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October 25, 2021

Superior National Forest

Constance Cummins, Forest Supervisor

C/O: Michael Jimenez, Project Leader

8901 Grand Ave. Place

Duluth, MN 55808

Phone: 218.626.4383

Email: comments-eastern-superior@usda.gov

RE: Lutsen Mountains Ski Area Expansion Project, Draft Environmental Impact Statement

Ms. Cummins and Mr. Jimenez,

The Minnesota Department of Natural Resources (MN DNR) has conducted a review of the Lutsen Mountains Ski Area Expansion Project, Draft Environmental Impact Statement.

We would like to thank the Superior National Forest and the project proposers for the opportunity to comment on this project and encourage the project proposers to continue their coordination with MN DNR and other agencies to protect natural resources in the project area. In the spirit of this coordination, we would like to provide additional information on the natural resources in the area that may help enhance those efforts.

Specific Project Related Comments

Alternative Preference: Alternative 3

Ideally, the DNR prefers the No Action Alternative, but realistically recommends Alternative 3 for reasons outlined below. The DNR has several concerns about the environmental impacts of the proposed project, including impacts to water quality, wetlands, the Lutsen Scientific and Natural Area, wildlife habitat and the existing snowmobile trail system. Following are specific comments, including some repeated from the DNR's May 28, 2020, scoping comments letter.

Rollins Creek

Alternative 3, while still representing a vast expansion of Lutsen Mountain, avoids virtually all the hydrologic and water quality impacts the full development proposal (Alternative 2) would have in the Rollins Creek watershed. Alternative 3 would create fewer impacts to wetlands in that watershed and would protect a greater area of sensitive habitat. Development would be limited to the less sensitive Lake Superior-facing slopes of Eagle and Moose Mountains and eliminate virtually all development on the steeper, more sensitive slopes on the backside of Moose Mountain that drains to Rollins Creek. Planned runs on the Moose Mountain portion of

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the project lie on a steep slope, and would end at the edge of the extensive, high-quality wetland that is the source of flows in Rollins Creek. The wetlands possess many values and support a wide variety of wetland-dependent wildlife and plant communities. Erosion control of run-off on the steep slopes found on the north side of Moose Mountain would be extremely difficult, since those slopes are laid out to go directly down the face of the slope, as close to vertical as possible. Another issue of concern on Rollins Creek is the potential effect of adding a large amount of artificially produced snow cover, and subsequent run-off, to its upper reaches. The increased snowmelt runoff has the potential to alter stream hydrology and/or the stream channel by increased erosive forces within the channel during higher flow volumes in the spring.

Adjacency to Lutsen Scientific and Natural Area

The DNR has requested in previous comments during scoping, that the USFS coordinate with the DNR to address potential direct and indirect impacts to the Lutsen Scientific and Natural Area (SNA) and to include the SNA on all maps. The SNA is not addressed in the draft EIS, nor is it identified on any the maps. Exclusion of this information is noted as a gap in analysis. For this review, we reiterate our initial request and refer to those comments (below). The DNR requests that the USFS coordinate with DNR staff Arika Preas (arika.preas@state.mn.us) and AmberBeth VanNingen (amberbeth.vanningen@state.mn.us) regarding the SNA, potential impacts to the site and mapping needs. Since SNAs are the closest state equivalent to federally designed Research Natural Areas, the SNA could be treated as such for review in the EIS. Following are the comments addressing Lutsen SNA from the DNR's May 28, 2020, scoping comments letter:

Scientific Natural Area

The project is directly adjacent to Lutsen Scientific and Natural Area (SNA). Please coordinate with MN DNR SNA staff on the boundary location to avoid encroachment, ensure compliance, and minimize potential impacts. We recommend ensuring a clear depiction of this SNA on all maps. It is requested that you work with MN DNR staff to address potential direct and indirect impacts to SNAs from all stages of the project development and use over time, including: rare species habitat, old-forest fragmentation, native plant communities, erosion, and hydrology. Please note the [Poplar Agnes] and [Onion River Hardwoods] are sites of Biodiversity Significance ranked as having Outstanding Statewide Biodiversity Significance.

Mapping the Lutsen SNA's proximity to the proposed project can help identify if any portion of the expansion might occur within the SNA boundary, or not. This is important because under the Minnesota Environmental Policy Act (MEPA), (MN Rules Chapter 4410.4300, Subp. 30) any physical encroachment into an SNA that is inconsistent with SNA laws and/or the management plan for the unit may be subject to additional mandatory state environmental review. If environmental review under MEPA is required, the project may not be started, and governmental decisions may not be issued until the environmental review process is complete.

Impacts to Lutsen Snowmobile Trail

The Lutsen Snowmobile Trail currently crosses the proposed expansion of the Lutsen Ski Hill. Because recreational snowmobilers value the area for having some of the best lodging and food in the area, DNR Parks & Trails, the Lutsen Trails Breaker Club, and the Lutsen Snowmobile Club would prefer to maintain an open route to Lutsen Ski Hill and its associated lodging and restaurants. The current snowmobile trail access has existed for many years and the snowmobile clubs would prefer to maintain this direct route as opposed to rerouting the trail from Hwy 61 along Ski Hill Road to this area. If a reroute of the snowmobile trail is necessary, it should continue to provide access to the Lutsen Ski Hill, lodging, and restaurants in this area.

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Additionally, this section of trail is grandfathered throughout the Lutsen SNA, which limits options for a reroute of the snowmobile trail. Rerouting the trail along the Ski Hill Road would necessitate many new driveway crossings and the Ski Hill Road ROW is narrow with deep ditches along the route, making it a difficult trail reroute to build.

Impact to Moose and Deer Habitat

Moose typically don't spend much time near the resort, but when they do, it's usually on the western or Northwest side of the mountain. Deer spend their winters near the shore (unless it's a mild winter

without much snow) and benefit from plowed roads. Activities that remove large amounts of forest and leave the land open, especially on sloped terrain, is always a concern for wildlife and for run off.

Thank you for the opportunity to review the Lutsen Mountains Ski Area Expansion Project, Draft Environmental Impact Statement. Please contact the MN DNR, Northeast Region, Ecological & Water Resources, Assistant Regional Manager, Cliff Bentley, with any questions. Cliff can be reached at (218) 834-1441 or via email at: cliff.bentley@state.mn.us.

Sincerely,

Captain Shelly Patten

Acting NE Regional Director, MN DNR

CC:

Jill Townley

Lisa Joyal

Darrell Schindler

Cliff Bentley