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Comments: [External Email]Lutsen Mountains Ski Area Expansion Project

[External Email]

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ATTN: Superior National Forest

Constance Cummins, Forest Supervisor

Michael Jimenez, Project Leader

I am submitting this letter containing questions of concern regarding the Lutsen Mountains Expansion DEIS on behalf of the Cook SWCD Board.

Thank you,

Theresa Oberg, District Administrator

Cook County Soil & Water Conservation District

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COOK SOIL & WATER CONSERVATION DISTRICT

- conserving and protecting soil and water resources -

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October 21, 2021

Constance Cummings, Forest Supervisor

c/o Michael Jimenez, Project Leader

Superior National Forest

8901 Grand Avenue Place
Duluth, MN 55808
Ellen Bogardus-Szymaniak, District Ranger: Lutsen DEIS Project
Tofte Ranger District
7355 West Highway 61
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Tofte, MN 55615

Re: Lutsen Mountains Ski Area Expansion Project

The mission of Cook County Soil and Water Conservation District (Cook SWCD) is to maintain soil and water quality in Cook County by fostering responsible land use and by controlling soil erosion and non-point pollution. Cook SWCD has a history of working with Lutsen Mountains (Lutsen) to implement best management practices for stormwater runoff and erosion control, especially as they relate to the Poplar River Watershed and overall water quality. Many projects have been installed through grant funding secured by Cook SWCD, in cooperation with the Poplar River Management Board (PRMB). After 15 years of collaboration, secured funding, and completed projects, the turbidity levels in the river have been reduced, resulting in the Poplar River being de-listed from the Environmental Protection Agency (EPA) impaired waters list. In addition to working with Lutsen, Cook SWCD has a history of working with other private landowners addressing water quantity, vegetation, and erosion issues within the Poplar River Watershed and surrounding watersheds.

The Board and staff encourage local conservation efforts by providing educational, technical, and financial assistance for local land users. Cook SWCD has been actively engaged in receiving Lutsen's Master Development Plan (MDP) information and corresponding with Superior National Forest (SNF) project leaders to stay informed about the special use permit (SUP) process and Lutsen's SUP proposal. We appreciate the opportunity to comment and would like to continue to be a part of the conversation as it relates to the Lutsen Mountains Ski Area Expansion Project.

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Due to potential impacts to landowners adjacent and downslope of the project area, experience with runoff management in the area, and the mission of the District, the board would like to bring forward the following concerns and questions:

1) Within section: 1.3.1. U.S. Forest Service's Purpose and Need for Action and Appendix A.1, there is general mention of the maintenance requirements for the expansion as it relates to permitting.

a) Under the SUP, will there be an operation and maintenance plan for the access roads, ski runs, buildings, and parking lots (development)?

b) If so, will monitoring of the plan(s) occur and by whom?

c) If there is a violation of the SUP and the ecosystem has been impacted, how is the violation handled and what happens to the landscape? For example, fines or restoration orders?

2) Watershed health of the Poplar River is now becoming stable after considerable public funds spent to implement conservation practices. The new development is stated to not impact the Poplar River Watershed; however, three new watersheds within the overall Lake Superior North Watershed will be affected[hellip] Upper Rollins Creek Watershed, (Moose Mountain) Frontal Lake Superior Watershed, and (Eagle Mountain) Frontal Lake Superior Watershed.

The hydrology impacts are addressed in section 3.10 Hydrology and within Table 2.4-1 It is identified that there will be an increase in hydrological flow within the areas of development.

a) Does the SUP include a stormwater management component outside of the permitting requirements?

b) How will the affects to landowners downslope, especially near Lake Superior shoreline, be addressed?

c) How does the plan address predictions of climate change and more frequent 100-year storm events and drainage systems becoming more flashy and susceptible to these impacts?

d) In the event the 13-million-gallon water storage fails [ndash] what is the mitigation plan?

3) The Minnesota Pollution Control Agency (MPCA) has established Watershed Restoration and Protection Strategies (WRAPS) for the Lake Superior North Watershed (HUC 8). The WRAPS is referenced in Table 2.4-1 and in the Regulatory Compliance section of the EIS.

These efforts and resulting data need to be continually applied when considerations are made regarding impacts

to water quality and quantity. For example, water sampling schedule of the newly impacted streams for flow rates, turbidity, and levels of biological presence from the use of Snowmax.

(<https://www.pca.state.mn.us/sites/default/files/wq-ws3-04010101b.pdf>)

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4) In sections 3.7 and 3.11 of the EIS, forests and wetland impacts were addressed.

a) Clearing of [l]anes[r] and glading of trees reduces the understory and forest complexity and diversity. Homogenizing the forest and wetland impacts will increase water flow on the landscape due to removing absorption and storage, what is the plan for this additional water to the landowners below the SUP?

5) Cook County has an invasive species team to manage terrestrial invasive species. There is some mention of noxious weeds (p.242) and in section 3.7 invasive species are addressed during construction and 3 years following construction. With maintenance roads and possible summer visitation increase and use of the area, it[r]s likely that with any new disturbance on the landscape and development of roads/buildings there will be an increased risk of invasive plant colonization and spread.

a) Will a plan be in place to control invasive plants beyond winter as maintenance roads are accessed year-round, as well as individuals visiting the area, potentially transporting seeds via shoes and vehicles?

6) What are the requirements if the SUP is abandoned or not renewed [ndash] is there a baseline assessment of the current landscape that the area will be restored to?

These concerns are brought forward as part of our mission to improve and maintain the high quality of water and soil resources in Cook County. Cook SWCD advocates for responsible land use and supports implementation of stormwater management and erosion control practices.