

Data Submitted (UTC 11): 10/16/2021 9:06:52 PM
First name: Sarah
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Organization:
Title:
Comments: "Lutsen Mountains Ski Area Expansion Project"

Greetings,

Attached are our comments pertaining to the Lutsen Mountains Ski Area Expansion Project. If for some reason you can not read it, it is pasted below. Thank you for your consideration.

Sarah and Aaron Poznanovic

Aaron and Sarah Poznanovic
P.O. Box 1072
Grand Marais, MN 55604

USDA Forest Service
Superior National Forest
Tofte, MN 55615

Re: Lutsen Mountains Ski Area Expansion

To: Deciding Official

We are opposed to the proposed Lutsen Mountain Ski Area Expansion. Detailed below are the reasons this project should not be approved.

The Lutsen Mountains Ski Area Expansion onto federal land is counter to the Forest Service mission. The mission of the Forest Service is "to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations". Taking 495 acres (Alt 1) or 478 acres (Alt 2) of pristine federal land and allowing a private organization to use it for private benefit does not align with the Forest Service's mission. At present, this area is free and open for anyone to recreate on and enjoy. It is also providing a wide-array of ecosystem services to the benefit of all people and life on earth. Allowing this area to be converted to ski runs that require a high fee for use, drastically changes the pristine character, and takes many of the current ecological, cultural, and recreational benefits away from this area. We oppose Alternative 2 and 3, but support Alternative 1.

Loss of intact, vulnerable and imperiled, undisturbed plant community types.

Much of the proposed land to be converted to ski runs and trails are intact, rare, remnant plant community types that should be maintained in their current state. According to the draft EIS, 433 acres (of 627 acres mapped) within the project area of the proposed Lutsen Mountain Ski Area Expansion are considered critically imperiled

(159 acres) or vulnerable to extirpation (274 acres) native plant community types (p. 162-163). 290 acres (67% of 433 acres) of these critically imperiled or vulnerable to extirpation would be impacted under Alt 2; 249 acres (57%) would be impacted under Alt3. In addition, 455 acres (of 639 acres) within the project area are categorized as outstanding sites of biodiversity significance. These "sites contain the best occurrences of the rarest species, the most outstanding examples of the rarest native plant communities, and/or the largest, most ecologically intact or functional landscapes". Under Alt 2, 316 acres (69% of 455 acres) would be impacted; 289 acres (62%) would be impacted under Alt 3 (see Table 3.7-5 and 3.7-10, p 175 and 179). The areas in consideration for expansion are intact, functioning undisturbed plant communities; which include many acres of old northern white cedar and mesic hardwoods forest types, which are important cultural sites to the local Native American tribes. Intact, undisturbed plant community types such as these are very rare and therefore should be preserved as is. Alternative 1 best preserves these rare intact plant community types.

Spread of non-native invasive species. Currently, there are 26 non-native/invasive species present at Lutsen Mountains, per a 2020 MNR survey. Invasive species were found to be most abundant on and along the edges of the ski trails. Land clearing and associated disturbance on 478 or 495 acres of pristine intact federal land would further increase non-native invasive species densities on the Superior National Forest. This would further degrade these pristine, intact, rare plant communities. Please choose Alternative 1 to protect and prevent the spread of non-native invasive species into these sensitive and rare plant communities.

Irretrievable contributions to climate change. Existing forests in the proposed Lutsen Mountain Ski Area Expansion are storing carbon, have been storing carbon for over 100 years in some instances, and will continue to store carbon if the area is left undisturbed. Under Alternative 2 and 3, many trees would be cut down and land would be converted to grass and herbaceous cover. Much of the carbon stored in those living and dead trees will likely be lost. The harvested trees would likely be converted to firewood or paper, as opposed to lumber, so their carbon would be emitted into the atmosphere instead if stored. In addition, the EIS states that "the addition of new trails, snowmaking capability, and infrastructure at Lutsen Mountains represent irretrievable contributions to climate change and air quality, because the emissions that would be generated from the construction and operation of the proposed projects and increased visitation cannot be retrieved." Climate change is real and preventing further contributions to greenhouse gas emissions into the atmosphere is extremely important now and into the future. Therefore, Alternative 1 is the best choice for minimizing climate change emissions.

Alternative 2 and 3 are both pretty similar. Both alternatives propose nearly 500 acres of expansion. Why is there not an alternative that proposes 250 or 200 acres of expansion? Why is there not an alternative that impacts more secure, common, widespread and abundant plant community types? We are opposed to Alternative 2 and 3, but would support choosing Alternative 1 or an additional alternative with reduced expansion acres that expand on common and abundant plant community types.

Please choose Alternative 1 for your decision or explore additional alternatives that have less negative environmental, cultural, and recreational impacts.

Thank you for your consideration.

Sincerely,

Aaron and Sarah Poznanovic