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

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On Behalf of the Superior Hiking Trail Association --

Position Statement:

Lutsen Mountains Expansion Draft Environmental Impact Statement

Superior Hiking Trail Association

October 18, 2021

Location:

Lutsen Mountains Ski Resort in Cook County, Minnesota | Superior National Forest - Tofte Ranger District

Background:

The Superior Hiking Trail Association is the nonprofit organization that builds, renews, manages, and protects the Superior Hiking Trail, a 300-mile natural-surface trail linking Wisconsin to an overlook of the Canadian border. An estimated 100,000 people use the Trail each year. The SHT provides the premier backpacking experience in Minnesota, if not the Midwest and it hosts many events, including the Superior Fall Race, one of the first 100-mile races in the nation. Hikers, runners, and snowshoers come to the SHT year-round to enjoy its remote setting. The Superior Hiking Trail Association was made aware of Lutsen Mountains Ski Resort to expand, on January 16, 2018, when former SHTA executive director Denny Caneff met with Charles Skinner of Lutsen Mountains to discuss the project. It was understood that they (Lutsen) would pay for the cost of relocating the Superior Hiking Trail in the event of a ski expansion, although no agreement was made with Lutsen Mountains regarding the final route of the SHT.

In the fall of 2018, SHTA's consultant, Critical Connections Ecological Services, created a map for the SHTA that showed a proposed reroute following high ground north of Moose Mountain. This would remove the SHTA entirely from the Lutsen Mountains Expansion Project (see attached map).

In April of 2020, SHTA submitted a proposed reroute of the SHT and formal comment to USFS (see attached April 2020 Comments). In summary, SHTA requested that the project not move forward until an acceptable route could be identified and approved, and that an agreement between the SHTA, Lutsen Mountains, and the US Forest Service regarding the payment and construction of that route was in place before proceeding. This has not happened.

Superior Hiking Trail Association comments in response to DEIS:

Superior Hiking Trail Association's position has not changed. The SHTA firmly believes that our users' experience will be greatly diminished under both Alternatives 2 and 3. If the project is to proceed, SHTA wishes to relocate the SHT off the active ski area with the cost of the relocation to be covered by Lutsen Mountains. Counter to the draft Environmental Impact Statement (EIS), SHTA views staying in place as a non-viable option and the EIS falsely characterizes a sustainable cohabitation of the alpine ski facilities and hiking trails.

SHTA has arrived at this conclusion after reviewing the following statements within the EIS:

\* Page 22 (of 344) cites this: "The second trail that would be realigned is an 8,947-foot-long portion (1.7-mile) of the SHT/NCNST within the proposed Moose Mountain area of the SUP. This portion of the SHT/NCNST is located both on the backside (northwest side) of Moose Mountain and along the ridge, particularly within areas of proposed Pods 4 through 6. As part of the trail realignment, switchbacks would be constructed to decrease the

trail grade on the backside of Moose Mountain and improve the hiking experience. The realignment would add an additional 1,289 feet (0.2 mile) to the length of the SHT/NCNST. This alignment was developed in coordination with the Superior Hiking Trail Association during pre-planning activities; in addition, LMC would continue to coordinate with the Superior Hiking Trail Association, North Country Trail Association, and the U.S. National Park Service prior."

This statement is not true. The Superior Hiking Trail Association/North Country Trail Association/National Park Service did not approve an alternative other than the reroute that SHTA submitted as our formal comments in April of 2020.

\* EIS cites Spirit Mountain as precedent for cohabitation of hiking trails and active ski hill. Spirit Mountain is an incredibly poor precedent to cite, as the SHT has experienced severe erosion issues throughout this ski rec area. We have witnessed the hydrology of the landscape change dramatically over time, particularly after large-scale weather events. Once small perennial wet spots that required a few feet of boardwalk have over time opened up to small ravines that cut through the hillside and now require footbridges. Staying on a ski hill is expensive and time consuming for SHTA to maintain. This is an unnecessary cost passed onto our nonprofit, which is powered by volunteers and donations. In addition it is not free of conflict with mountain bikers and other users who often mistake the SHT as part of the Spirit Mountain extensive bike trail system.

Duluth is a city of 86,000 people with limited options for trail alignments, but that is not the case at Lutsen. At Spirit Mountain the ski infrastructure predates the build of the SHT, whereas at Lutsen it is the opposite.

\* Snowmelt/spring run-off at a ski resort is not natural, due to snow making activities, tilling and compacting, and ski traffic. The result is far more snowpack, which often compacts like ice that lasts far into the spring and even summer after the snow has melted everywhere else. This is what causes a trail, especially on the north side of a slope to never dry out and suffer from severe mud issues. Or, in the case of heavy spring rains, an excessive amount of runoff which causes erosion to hillsides and trails, and floods streams and rivers, eroding banks and taking out our bridges. Long-term maintenance of the SHT at its current location (Alternative 3) or proposed reroute (Alternative 2) will be costly to maintain, SHTA's proposed reroute is the most sustainable option.

\* The draft EIS did not address seasonal closures or temporary closures of the Trail. The SHTA objects to any seasonal closures. Additionally, the SHTA does not want to be subject to an extended trail closure while the project is under construction.

\* Even with the reduced scope of ski infrastructure as outlined in Alternative 3, the wild, rustic nature-based experience to which the Superior Hiking Trail strives to provide would be greatly diminished because of the sound, lights, additional visible infrastructure and influx of visitors.

#### Conclusion

The draft EIS has led SHTA to interpret that our initial request as being dismissed, and that costs associated with SHT's relocation are being passed along to SHTA, a nonprofit entity that provides free recreational access to public land, in order to make room for a fee-based, for-profit's access to public land.

We are reaffirming our original comments submitted on April 2020, "SHTA would request that the project not move forward until an acceptable route can be identified and approved, and that an agreement between the SHTA, Lutsen Mountains, and the US Forest Service regarding the payment and construction of that route be in place before proceeding."

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