

# COOK SOIL & WATER CONSERVATION DISTRICT

- conserving and protecting soil and water resources -



May 26, 2020

Superior National Forest  
Constance Cummins, Forest Supervisor  
c/o Michael Jimenez, Project Leader  
RE: Lutsen Mountains Ski Area Expansion Project  
8901 Grand Ave. Place  
Duluth, MN 55808

Cook County Soil and Water Conservation District (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). Recently, projects funded by a Clean Water Land and Legacy grant were completed, reducing the levels of turbidity in the river, resulting in the Poplar River being de-listed from the Environmental Protection Agency (EPA) impaired waters list.

The mission of the Cook SWCD is to improve water quality in Cook County by fostering responsible land use and by controlling soil erosion and non-point source pollution. 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.

At this time, questions of concern brought forward by the Cook SWCD Board include:

*Under the SUP, will there be an operation and maintenance plan for the access roads, ski runs, buildings, and parking lots (development)? If so, will monitoring of the plan(s) occur and by whom? 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?*

*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, two new watersheds within the overall Lake Superior North Watershed will be affected...Rollins Creek and Frontal Lake Superior.*

*Does the SUP include a stormwater management component? Is there consideration of the higher flows for longer periods of time on seasonal drainages and the impacts to two watersheds? How will the affects to landowners downslope, especially near Lake Superior shoreline, be addressed? How does the plan address predictions of climate change and more frequent 100-year storm events? In the event the 13-million-gallon water storage fails – what is the mitigation plan?*

*The Minnesota Pollution Control Agency (MPCA) has established Watershed Restoration and Protection Strategies (WRAPS). Will these efforts be 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>)*

*How will the diverse forest and wetlands be impacted and factored into the SUP? Clearing of ‘lanes’ 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? Also, it’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. Will a plan be in place to control invasive plants?*

*What are the requirements if the SUP is abandoned or not renewed – 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.