



Constance Cummins, Forest Supervisor
c/o Michael Jiménez, Project Leader
Superior National Forest
8901 Grand Avenue Place
Duluth, MN 55808

May 19, 2020

Re: Lutsen Mountains EIS Projects

As you know, the Superior Hiking Trail (SHT) is now an official part of the North Country National Scenic Trail (NCT) following the passage of the *John D. Dingell Jr. Conservation, Management, and Recreation Act* in 2019. The non-profit North Country Trail Association (NCTA) works to build, maintain, promote, and protect the 4,600-mile NCT and thus we are responding with comments to your project.

Like our affiliate partner organization, the Superior Hiking Trail Association (SHTA), the NCTA does not oppose in principle the Lutsen Mountains expansion project and recognizes the benefits of the expansion project to the local community and the entire region. Your scoping letter states:

The second trail that would be realigned is a 8,947-foot-long (1.7-mile) portion of the Superior Hiking Trail within the proposed Moose Mountain area of the SUP. This portion of the Superior Hiking Trail is located both on the backside (northwest side) of Moose Mountain and along the ridge, particularly within areas proposed for 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 Superior Hiking Trail. LMC would realign the trail in coordination with the Superior Hiking Trail Association.

Both organizations; however, believe that the statement underlined above minimizes the potential cumulative impacts to the SHT / NCT. We also do not believe that the Superior Hiking Trail mitigation measures as proposed in Lutsen's Master Development Plan will be even close to adequate in protecting the Trail and its experience as is stated in your letter. Below are some anticipated negative impacts that could result from this project:

- 1) This project would result in the conversion of the SHT / NCT within the SUP boundary from a 100% forested, primitive footpath to one that is >40% engineered footpath across a cleared ski slope (estimated percentages)
- 2) The new SHT would be located right alongside the new gravel road atop the ridgeline for 100+ feet and also located just below the new summit lodge. Currently, the SHT / NCT does not cross any gravel roads or pass by any buildings within the SUP area. These man-made features would negatively impact



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the primitive SHT experience currently available on the ridgetop.

3) Some undetermined length of the SHT / NCT would be forced into wetlands at the bottom of proposed Lift 6. Additional parts of this section outside of the wetland boundaries would likely remain especially wet well into the summer from prolonged snowmelt from the ski trails.

4) We have concerns over how long the SHT / NCT would have to be closed during construction as it seems unlikely that hikers would be able to safely pass through such a large the construction site. Day hikers on the SHT can plan ahead to avoid the project but unfortunately, there is no effective alternative detour for SHT / NCT long-distance hikers to follow around the project.

5) We have questions about the sustainability of switchbacks on Lutsen's proposed SHT / NCT relocation because the slope is so steep. Slopes along the existing segment of the SHT / NCT approach 40° and we are not sure that the proposed switchbacks will be a sustainable route in the long-term.

6) We also have serious concerns about the SHT / NCT having to be closed to hiking in the late fall during snowmaking operations and during the ski area's winter operation because of liability concerns. The SHT / NCT is intended to provide a year round recreation experience and that may not be possible following the Lutsen expansion project.

An objective of this project should be to, at worst maintain and, if possible, enhance the recreation experience found on the SHT / NCT within the Superior National Forest. We believe the plan put forth by Lutsen Mountain's MDP and the Superior National Forest does not do that. Because of this, we ask you to consider the relocation of the SHT / NCT off of Moose Mountain as proposed by the SHTA as an integral part of this project. We believe that relocation would result in a win-win solution whereby Lutsen Mountain's expansion plans can proceed and the SHT / NCT experience is not negatively impacted by those plans.

If that is not possible, we ask that all of the negative impacts to the SHT / NCT mentioned above be minimized as much as possible during the Lutsen expansion project followed up by a follow-up relocation project. We also expect the Superior National Forest to continue to work in close coordination with the SHTA to protect the SHT / NCT experience like you have been over the years.

Thank you for the opportunity to provide our comments.

Sincerely,

Andrea Ketchmark, Executive Director
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