



November 23, 2021

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

By email to: comments-eastern-superior@usda.gov
Also submitted to project portal

Re: Lutsen Mountains Expansion DEIS Project

Dear Supervisor Cummins,

This letter represents the comments of the below-signed twelve organizations regarding the Draft Environmental Impact Statement for the proposed Lutsen Mountains Expansion Project.

We find the DEIS inadequately addresses specific issues of environmental equity, treaty responsibilities, and the important adjacent Minnesota Scientific and Natural Area. We find the draft to be lacking and urge the National Forest to address these substantial deficiencies

Further and more broadly, we find that the DEIS inadequately addresses the environmental impacts from the project, including water quality for Poplar River and Lake Superior, the adverse impacts to intact SNF forests, and the impacts to wildlife. We note the context that this a private company using public lands for their profit.

The DEIS covers projects that will not be implemented for 20 years.

Page 88 notes that this would be built in phases, with the final 3 of 6 “pods” not being completed for 20 years after approval. Given the changing climate and changing economy, this is too long of a timespan to adequately assess the impacts of continued expansion. For example, the North Shore saw rapid die-off of its birch trees in the two decades of the 1990s and 2000s. The sugar maple trees may have already been listed as endangered by 2040 or may already be extirpated.

The DEIS does not acknowledge equity issues with the users, only local population impact

In a USDA study, [Recreating in color: Promoting ethnic diversity in public lands](https://www.fs.usda.gov/rmrs/recreating-color-promoting-ethnic-diversity-public-lands) (<https://www.fs.usda.gov/rmrs/recreating-color-promoting-ethnic-diversity-public-lands>), USFS scientists acknowledge that there is a wide disparity in racial and ethnic use of national forests. The study advises National Forest System staff to encourage different racial and ethnic groups to connect with public natural lands. The vision promulgated in the report is for forest managers to transform management practices and priorities to encourage wider use of natural lands by different racial and ethnic groups. The DEIS fails to engage on this national vision.

Page 120 of the DEIS simply notes the current racial diversity statistics about Cook County and states without attribution that neither alternative is anticipated to affect those statistics. The DEIS does not describe how this project will affect the racial diversity of users of the expanded facility. The DEIS should show how the project will improve access to the National Forest for the regional and statewide BIPOC community.

The DEIS does not acknowledge the adjacent Scientific and Natural Area

The DEIS does not acknowledge or reflect the presence of the Lutsen Scientific and Natural Area (SNA) and, importantly, its Lloyd Scherer conservation sub-unit. The SNA is located directly adjacent to the east of the Eagle Mountain project area. The project administrators should ensure that maps such as Figures 6 through 9 do have the SNA located and identified. Also, the DEIS should address the impacts of the project on this SNA, including but not limited to: (1) additional fragmentation of the forest, diminishing the ecological integrity of the SNA and adjoining ecosystem; (2) increased noise and traffic, diminishing the quietude and increasing air pollution; and (3) the blight on the scenic and aesthetic resources of the SNA., based on comments the Minnesota DNR has already presented.

The DEIS does not adequately address federal treaty responsibilities

As citizens of the United States of America, we have obligations under the 1854 Treaty of LaPointe to ensure that bandmembers of Grand Portage, Fond du Lac and Bois Forte bands retain access to their usufructuary practices in the federal land under consideration here. The DEIS does not make it clear how the federal government will maintain these obligations. It's not enough to know how many acres of sugar maple forest or white cedar will be impacted, it's also important to know how this loss will be mitigated.

The text in Table 2.4-1 "Summary Comparison of Direct and Indirect Environmental Consequences", on pages 45-46 suggests that this "Decrease" will be "offset by the abundance of habitat throughout the SNF." This response is inadequate. On the access issue alone, Moose Mountain maple forests and the sugarbush found there are uniquely accessible and should, out of respect for our treaty relations, be considered as one-of-a-kind until proven otherwise, unless adequate mitigation can offset this loss

Based on these concerns, we find the current DEIS to be lacking and urge the National Forest to address these substantial deficiencies.

Please respond to Andrew Slade of Minnesota Environmental Partnership at andrew@mepartnership.org or 218-727-0800.

Sincerely,



Steve Morse
Executive Director

And the 12 organizations listed on the following page.

Lindsay Brice
Audubon Minnesota

Marc Fink
Center for Biological Diversity

Steve Schultz
Clean Water Action Minnesota

Tom Casey
Friends of Minnesota Scientific and Natural Areas

Craig Sterle
Izaak Walton League Minnesota Division

Gay Trachsel
League of Women Voters Duluth

Claudia Egelhoff
Minnesota Ornithologists Union

Laurie Schneider
Pollinator Friendly Alliance

Jan Joannides
Renewing the Countryside

Lori Andresen
Save Lake Superior Association

Elanne Palcich
Save Our Sky Blue Waters

Jean Ross
Vote Climate