Data Submitted (UTC 11): 5/28/2020 2:05:33 AM
First name: Chel
Last name: Anderson
Organization:
Title:
Comments: The proposed expansion of Lutsen Mountain ski area onto adjacent National Forest is a significant permanent conversion of forest with many biological and ecological impacts that merit consideration. I ask that the U.S.F.S. Superior National Forest consider in detail within the environmental analysis:

the net loss of forest with biological, ecological, visual, social and economic values not served by the proposed recreational facilities;

the forest area that would be destroyed is an integral part of an area of native plant communities and associated species populations ranked by the MNDNR's Minnesota Biological Survey as having "Outstanding Statewide Biodiversity Significance";

the addition of glade skiing between the cleared runs seems likely to result, if not immediately, eventually, in loss of understory shrubs and trees over a very wide area; this means that what remains is no longer a forest in any functional sense - ecologically no different than the adjacent traditional runs and its biological and ecological impacts should be considered to be similar;

the opening and thinning the forest in the glade areas where paper birch is a dominant component is likely to accelerate the decline of this species well-documented as adversely sensitive to disturbance, soil warming and climate warming, resulting in a contiguous, deforested area of both the glade areas and adjacent traditional runs;

the areas of proposed impact on Moose and Eagle Mountains appear to include upland white cedar forest - ranked by MNDNR as S3 - "vulnerable to extirpation";

viewshed impacts - the expansion of the ski area would expand a large, unnatural break in the forested ridges of the North Shore, detracting from the Forest Plan goal of a scenic landscape, from the many locations in the landscape and and from Lake Superior; in this context a temporary 142-acre clearcut for forest management would likely be unacceptable, 142 acres of permanent clearing and accompanying development would be a far more consequential impact;

the impacts i.e. loss of habitat and direct destruction and disturbance of clearings, understory removal, roads, and significant increase in human presence to wildlife;

the impacts to the federally Threatened Canada lynx and any Region 9 Sensitive Species;

the quantity and impacts of run-off associated with the proposed clearing and development to public and private lands, including white cedar forest, and Lake Superior;

the cumulative impacts of the existing recreational facilities i.e non-motorized and motorized trails of all kinds, golf course and private development and the proposed project to the North Shore Subsection and Land Type Association need to be analyzed in detail and depth;

are there alternatives on private land for facilities such as restaurants, ski shops, rental facilities, and parking with a shuttle to the existing parking lot;

the climate implications of the increased carbon footprint resulting from the energy required for additional snow-making, lifts and other proposed facilities;

in a warming climate, the biological, ecological, social and economic trade-offs between the permanent loss of functional forest and the expansion of a ski area located on a south-facing slope, adjacent to a warming (at a rate higher than the air temperature) Lake Superior.

Thank you for considering my scoping comments.