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Comments: This letter addresses the proposed expansion of the Lutsen Mountains ski area. I am writing as a biologist who has been a property owner in Cook County for 40 years, and has conducted lake and stream surveys there for the DNR, including in the Rollins Creek watershed included in this project. Over that time, lakes and streams in the area have suffered irreversible eutrophication, in spite of compliance with state regulations.

Therefore, despite the thoroughness of the Draft EIS, I am concerned about assumptions underlying it, issues it neglects, and contradictions it contains.

In evaluating this proposal, I take issue with the statement from the Executive Summary (p. ES-1) that the "overall purpose ... is to improve the guest and skiing experience". In fact the purpose described in the EIS is to increase the number of skiers. That purpose- a massive quantitative increase in the number of skiers- motivates a huge expansion developing private facilities on public land.

Not only would the projected capacity increase from ca. 2,850 to 6,300 skiers (or slightly fewer under Alternative 3), the number of cars expected on the additional ca. 5 miles of roadway would add 1,260 parking spaces to the existing ca. 200.

Although increased sediment loads from this extra traffic are estimated, and noting (p. 220) that "the proposed roads could have a negative impact on the condition on the watershed through sediment delivery to adjacent streams and could negatively affect riparian connectivity, water quality, and hydrology of the watershed", nowhere does the EIS address contamination from salt runoff. Aquatic invertebrates are highly sensitive to chloride loading, particularly to peak concentrations that are difficult to estimate, nor would they be well controlled by sediment catchments. And although the EIS recognizes this as a high-quality watershed, it claims (p. 59) that "impacts to water quality would be minimal or avoided ... and there would be no irreversible impacts to stream health", and "Impacts to aquatic species, including trout in Rollins Creek, are not anticipated".

The EIS also dodges the questions of how the proposed development would affect adjacent habitats. As noted (p. 51), the forest in and adjacent to the project area contain excellent sugar maple and old-growth white cedar stands. Despite noting the abundant invasives (tansy, thistle, etc.) in the existing ski area (p. 242), and noting these would be likely to invade newly developed ski areas (p. 51), there is no discussion of how the proposed development would not only provide new habitat for invasives, but serve as an immigration route bringing them into undeveloped areas beyond the project boundaries.

Finally, being all-too-familiar with the difficulties of employment and housing in the area, I take issue with the comments (Table 2.4-1) that "employment opportunities are likely to earn less than the annual mean income in Minnesota", but this "will not affect the housing market in Cook County". The seasonal jobs necessary to support this development are far more likely to exacerbate than ameliorate the housing shortage in the county.

The development proposal tries to cover itself in a thin veil of necessity, but there is nothing necessary about this project. There's no sense of obligation towards protecting any land, waters, or people outside the project boundaries.