

Data Submitted (UTC 11): 12/8/2021 7:53:08 PM

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Comments: Please consider the following comments on the Lutsen Mountain Ski Area Project. I have limited my comments to the following topics:

- Destruction of what appears to be the largest known site of the critically imperiled (S1) Spruce-Fir Woodland (North Shore) (FDn32e) native plant community,
- Direct impact to portions of two Sites of Outstanding Biodiversity as identified by the Minnesota Biological Survey and the implications for two High Conservation Value Forest (HCVF) areas identified by MNDNR as required by their certification by the Forest Stewardship Council-US (FSC-US),
- Soil disturbance on sites with severe to very severe erosion potential, and
- The poor track record of the Lutsen Mountains Corporation as an environmental steward.

The DEIS for this project identifies that under Alternative 2, 103.6 acres of the native plant community (NPC) FDn32e would be destroyed. If this native plant community has been correctly identified in DEIS, this 103.6 acres is 43% of known acreage of a state critically endangered plant community. Only 21 polygons totaling 139 acres of FDn32e are recorded in the MNDNR NPC polygon database. However, FDn32e is limited to the immediate vicinity of Lake Superior and hence the identification of this NPC in the Lutsen Mountain Ski Area Project is suspect. This discrepancy needs to be addressed by re-survey.

The DEIS notes that 40 acres of the Poplar-Agnes Site of Outstanding Biodiversity Significance and 276 acres of the Onion River Hardwoods Site of Outstanding Biodiversity Significance would be directly impacted by the project under Alternative 2. Each of these two sites contains state lands identified by MNDNR as High Conservation Value Forests. Under the FSC-US standard, "where HCVF attributes cross ownership boundaries and where maintenance of the HCVF attributes would be improved by coordinated management, then" MNDNR must attempt to "coordinate conservation efforts with adjacent landowners" (i.e., USFS). HCV's identified by MNDNR at these sites include: large habitat blocks of upland forest. Alternatives 2 and 3 would limit MNDNR's ability to coordinate with the USFS.

Alternative 2 would disturb 119 acres of sites with severe/very severe erosion resulting in 8.5 tons of sediment/year. This sediment load poses a threat to rivers and Lake Superior.

Finally, past trespass on the State of Minnesota's Lutsen Scientific and Natural Area involving resource destruction by the Lutsen Mountains Corporation and company's pollution of the Poplar River suggest that the company is not a good environmental steward.

Given that Alternative 2 would lead to the degradation of the unique forest ecosystems, I urge the Superior National Forest to select Alternative 1.