

Data Submitted (UTC 11): 10/31/2021 5:15:06 PM

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Comments: [External Email]Lutsen Mountains Ski Area Expansion Project

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Lutsen Mountains Expansion DEIS

Dear US Forest Service employees,

I am writing to express my concerns over the Lutsen Mountains Ski Area expansion project. I have read the environmental impact statement and related materials. I believe the project should not go forward for the following reasons:

1. Violation of the 1854 Treaty Rights of the Grand Portage Band of Chippewa. The treaty explicitly retains usufruct rights to the area of the proposed ski hill expansion and the Band has not approved the development. Treaty rights are not optional. If the Band does not want the land used this way, then under the treaty they have the right to block the expansion. Their opinions should (and legally do) count more than others.
2. Climate change concerns. The EIA discusses potential carbon emissions during construction but does not adequately address the longer term impacts. The Ski Hill does not have a carbon neutral source of energy for the expanded operation, including the snow making. Alpine ski areas are big energy consumers and bring more road traffic. I cannot see how in light of the emissions cuts required under the Paris Agreement nor the negotiations on-going in Glasgow for the COP26 that this kind of energy use is justifiable.
3. Environmental impact of snow making. The snow making facilities are far from environmentally benign. They draw significant water out of natural waterways and will create artificial holding ponds in an area that presently has very minimal human impacts. As the drought of 2021 shows, weather patterns are changing in the area and it is very unclear what the long-term forecast is for the watershed. Snow making is not a necessary activity. It is a 100% leisure industry activity and not justifiable given the untouched nature of the overall area and the climate change concerns listed under number 2.
4. Visual impact concerns. The ski hill will significantly expand the area of cleared and partially cleared forest, including on the northwest side of Moose Mountain. This area is visible from scenic hikes such as the Popular River Overlook (SHT). The Ski Hill would significantly impact the views of this iconic place. Already changes at the Ski Hill in the last 20 years have significantly increased the light pollution in the Lutsen area. Given that dark skies is one of the attractions, and highly valued aspects of the North Shore, increased lighting at the Ski Hill will negatively impact the night sky. I did not see mention of this impact in the EIA.

5. Economic sustainability concerns. I have skied at Lutsen Mountains since I was a child and love the area. But it has never been a crowded mountain. Indeed, outside of a handful of days a year, the mountain has more than enough capacity for the skier traffic it gets. The expansion commits the Ski Hill to attracting many more skiers than it has historically. If that effort is not successful, the mountain itself could close entirely. Furthermore, there are already major shortages of seasonal labor in the Lutsen area. There is nothing in the EIA that addresses how these labor shortages will be overcome to successfully operate the Hill.

In short, I am opposed to the expansion plans and hope that the Forest Service will take into consideration the very significant environmental and cultural impacts the plan has.

Sincerely,

Andrea Nightingale
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