

November 30, 1999

City of Duluth
Mr. Jim Mohn
Planning Department
Room 409 City Hall
Duluth, MN 55802

RE: Proposed Spirit Ridge Golf Course and Lodge
Environmental Assessment Worksheet

Dear Mr. Mohn:

The West Skyline Planning and Preservation Alliance (WSPPA) has reviewed the Environmental Assessment Worksheet (EAW) for the proposed Spirit Ridge golf course and lodge at Spirit Mountain. We find the EAW to be incomplete, and we recommend that an Environmental Impact Statement is needed.

The EAW does not include a discussion of the impacts of the project on the northern hardwood forest, wetlands, plants of special concern, or on the animals that live within the forest and wetlands. The EAW does not include an adequate discussion of the potential traffic impacts of the proposed hotel, nor any consideration of alternative locations for the hotel. The EAW does not include an adequate discussion of potential groundwater contamination due to runoff from the golf course. The EAW does not include an adequate evaluation of the potential visual impacts of the project. The EAW does not include a discussion of the cumulative environmental impacts that would result from future developments related to this project. The EAW does not include a discussion of any alternative plans.

Specific comments:

Item 11: Fish, Wildlife, and Ecologically Sensitive Resources

The EAW indicates that the golf course will be located within a mature stand of northern hardwood forest, but the EAW does not include any discussion of the impacts to this forest ecosystem as a result of clearcutting and thinning portions of the forest. A full discussion of potential impacts should be part of the EIS.

The EAW indicates that several plants of special concern (*Claytonia caroliniana* and *Adoxa moschatellina*) exist on the site, but there is no discussion of the potential impacts to these species as a result of golf course construction. A full discussion of potential impacts should be part of the EIS.

No survey of breeding birds or reptiles and amphibians has been done at the site of the proposed golf course. These surveys should be completed as part of the EIS.

Item 12: Physical Impacts on Water Resources

The EAW states that "Approximately 8 acres of trees on wetlands will be cut on the golf course site..." Many of these wetlands are black ash swamps, but there is no discussion of the impacts of removing the black ash trees—the major vegetative component—from the wetland. How will the vegetation change? What new species will dominate the wetlands? How will the water table change as a result? An analysis of the impacts should be included in the EIS.

The EAW also states that "cut wetlands on the golf course site will be mowed periodically to maintain forbs, sedges, and grasses compatible with wetland conditions." There is no discussion of the impact of "mowing" a forest wetland. Will the native grasses and sedges survive mowing? More analysis of the impacts should be included in the EIS.

Item 16: Soil, and Item 18: Water Quality

Under Item 16, the EAW states that "Golf course construction primarily will take place on the upland Ahmeek-like and Finland-like soils. Both the Ahmeek and Finland soils have moderate erosion potential and moderately high runoff potential. ... The deep to moderately deep Ahmeek-like and Finland-like soils have some increased risk of subsurface movement of soluble chemicals past the root zone."

Under Item 18, the EAW states that “The moderately deep to thin, coarse textured soils observed at Spirit Ridge are at risk to both surface runoff and subsurface leaching. . . . Soils forming significant preferential flow channels or drained with tile systems are at higher risk of subsurface quick flow of applied chemicals.”

The information in the EAW seems to indicate that the soils in the project area are likely to result in increased runoff from the golf course, and this runoff is likely to carry chemicals from the golf course straight into local surface water and groundwater. Neighbors in the vicinity of the golf course are dependent on the local groundwater for their drinking water. The EAW and Turf Management Plan list various best management practices that—if followed precisely—will “mitigate” the potential problems related to use of pesticides and herbicides on the golf course. But mitigate means to minimize, not to eliminate. And best management practices are dependent on the integrity and carefulness of the people who are implementing them.

Neighbors of the Spirit Ridge golf course do not want their drinking water contaminated by pesticides, herbicides, and fertilizers from the golf course. “Minimizing” this risk is not good enough. WSPPA recommends that an Environmental Impact Statement should be completed to thoroughly assess the potential for groundwater contamination as a result of this project and to consider alternatives to the project that would eliminate the potential for groundwater contamination.

Item 22: Traffic

The EAW includes information about the number of vehicles that might be generated by the project. However, it does not address the potential traffic safety problems that will be created by the location of the hotel. The proposed hotel entrance is located on a curve and a hill. Local residents have reported that this particular site is already dangerous in the winter, with a number of vehicles sliding off the road every year. Most traffic entering the hotel will be coming from the north and making a left-hand turn—across oncoming local traffic—into the hotel entrance. Local residents heading into town will be approaching the hotel entrance from the south, driving uphill toward a blind curve. Traffic entering or leaving the hotel will create a great traffic hazard at this site. In addition, fog is common all along this section of Skyline Parkway.

These traffic safety concerns need to be addressed in an EIS. An alternative site should be considered for the hotel, such as the north side of the ski slopes where the road is more level and straight.

Item 26d: Scenic Views and Vistas

The EAW indicates that Skyline Parkway has been recommended for federal “Scenic Byway” designation. However, the EAW fails to mention that Skyline Parkway has already been designated as a “State Scenic Byway.” The implications of this designation and whether the proposed project will appropriately fit into a management plan for the scenic byway should be addressed in an EIS.

Skyline Parkway is a historic and very scenic road that is well-loved by the people of Duluth. The EAW states that “Skyline Parkway provides an excellent scenic vista of the St. Louis River basin and the Duluth-Superior harbor. The golf course and hotel will not adversely affect this vista.”

It seems that a 4-story hotel perched on the hillside below Skyline Parkway certainly will adversely affect this vista. Current technology makes it possible to model visual impacts using computer graphics. An independent company should be hired to do a “Single Vantage Point Visual Impact Study.” This will give a clearer picture of the visual impacts of a 4-story, 65' high, 160-room hotel and 4.5 acres of parking lot alongside Skyline Parkway.

Item 27: Visual Impacts

The EAW states that “The project will not create any adverse visual impacts.” This is a statement of opinion, not fact. As mentioned under Item 26d, current technology makes it possible to model visual impacts using computer graphics. We request that an independent company be hired to do a “Single Vantage Point Visual Impact Study.” This will give a clearer picture of the visual impacts of a 4-story, 65' high, 160-room lodge and 4.5 acres of parking lot on the West Duluth hillside as well as the visual impacts of clearcutting and fragmenting the existing forest.

Item 28: Compatibility with plans

The Spirit Mountain Recreation Area Authority was created by the State Legislature. In addition to developing recreation facilities to aid the economy of northeastern Minnesota, the SMRAA was charged with the following responsibility: "The preservation of the environment in the area by a timely and intelligent plan of development." Destroying the complex ecosystem of a mature northern hardwood forest and its associated wetlands is not an intelligent plan of development. A full EIS is needed to consider alternatives to the proposed plan—alternatives that would provide recreational opportunities by taking advantage of the existing natural resource rather than irreversibly altering and destroying the existing resource.

Item 30: Related Developments, Cumulative Impacts

The EAW states that future development is likely at this site, including commercial uses, lodging, and housing. Part d of this item asks for a discussion of any cumulative environmental impacts resulting from this project and the future development. But there is no discussion what-so-ever of cumulative impacts. An EIS is needed to assess the additional impacts of future developments on traffic, groundwater resources, forest resources, wetlands, and the scenic qualities of the area.

Item 32: Summary of Issues

Part a of this item is entitled, "General Comments on Alternatives," but there is no discussion of any alternatives. The EAW merely attempts to support the current proposed plan as the only possible alternative for the site. What about other alternatives such as promoting this mature hardwood forest as a place for nature/environmental education? If a hotel were built without a golf course, an interpretive center could be part of the hotel, and one or more naturalists on staff could lead hikes into the forest and also direct guests to other spots in the Duluth area for wildlife viewing. The Spirit Mt. forest has also been proposed as the location of an international-level biathlon competition facility. These alternative uses have never been reviewed.

Part a(3) of this item states that "the current design is in keeping with the State enabling legislation" for Spirit Mt. However, that legislation states that the SMRAA is responsible for "The preservation of the environment in the area by a timely and intelligent plan of development." Destroying the complex ecosystem of a mature northern hardwood forest and its associated wetlands is not an intelligent plan of development.

A full EIS is needed to consider alternatives to the proposed plan—alternatives that would preserve the environment of the area AND provide recreational opportunities by taking advantage of the existing natural resource rather than irreversibly altering and destroying the existing resource.

Sincerely,

Russell Stover

Nancy Nelson

Co-founders, West Skyline Planning and Preservation Alliance