

Homuth, Dale (DNR)

From: George Spangler [spang001@tc.umn.edu]
Sent: Sunday, October 30, 2011 1:21 PM
To: Landwehr, Tom (DNR); DNR, publiccomment (DNR)
Subject: Lutsen Mountain Corp. Poplar River water use permit

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Commissioner Landwehr--Your internet article at

http://www.dnr.state.mn.us/input/issues/poplar_river/index.html states in its third paragraph that "In this case, the DNR believes there is just cause to issue LMC a permit based on the potential economic impacts to the local community, the low numbers of trout present in the affected reach of river, and the likelihood that some trout mortality will occur, whether LMC temporarily appropriates water or not." This is a complete fabrication, entirely transparent to even casual observers of government agency decision-making. There is no report by a credible DNR economist that compares the potential economic benefits (to the local community) of a ski resort in relation to the proven economic benefits of a North Shore trout fishery. There is no report by a credible DNR hydrologist, biologist, fishery manager or limnologist, that calibrates the importance of any specific level of trout mortality against the DNR mandate to protect and manage designated trout waters. There is no report by a credible population ecologist that considers the effects of additive or compensatory mortality in the trout population of the Poplar River (or any other North Shore stream) in order to judge the likely impacts of further de-watering the Poplar River. The result of all this is that the "DNR belief" alluded to in your website article clearly has no basis in the science of fishery management, or in "best management practices" that are said to be the foundation for management of natural resources in the State of Minnesota. In fact, it is not a belief widely held by practicing resource managers at all, rather it is a fantasy arising to justify caving in to a legislature hostile to the principles of rational management of public resources while placing the economic interests of private parties and campaign contributors above the interests of the general public. Such claims can only result in further deterioration of public confidence in DNR decision-making, while simultaneously demoralizing a dedicated corps of professional resource managers.

In contrast to justifications for issuing the permit posed on your website, there are ample indicators that LMC has violated the conditions of its earlier water withdrawal permits. Who has the greater credibility in this issue? Your Department of Natural Resources, or, a private interest that has knowingly exceeded the water withdrawals permitted by the DNR in the past? Your advisors may have counseled you to take a permissive posture on this particular permit, arguing that "a few trout in the Poplar River are not worth falling on your sword for". The issue is not a few trout, it is whether or not the DNR will manage Minnesota's resources on behalf of all the people of our state, and, in accordance with the best knowledge available for that management. I urge you to deny the LMC Water Appropriation Permit.

Thank you for the opportunity to comment.

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