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Organization:

Title:

Comments: Lutsen Mountains Ski Area Expansion Project

Dear Supervisor Constance Cummins,

I appreciate the opportunity to submit scoping comments regarding the Lutsen Mountains Ski Area Expansion Project.

Before getting to project-specific comments, I want to express my disappointment that you're holding a 30-day comment period in the midst of the COVID-19 pandemic. The COVID-19 pandemic has made it extremely difficult for many people, including those without broadband internet access, to review and comment on the Notice of Availability and Proposed Action. This is a major development proposal and to move forward without public meetings or opportunities for the public to engage directly with the Forest Service and Lutsen Mountains Corporation (LMC) is unacceptable. The Superior National Forest should extend this comment period until after the pandemic has subsided and everyone is able to provide informed comments, especially as this affects public lands.

I request the following are included in the scoping and environmental review analyses.

Any contribution to climate change, including the impacts from loss of trees.

The impacts this project would have on snow melt mitigation loss and downstream impacts because of the loss of melt mitigation via trees/vegetation and naturally developed ecosystems.

How erosion on the proposed project land will change, including how benefits of trees' and other plants systems' roots, which decrease erosion, will be impacted by this proposed project.

What habitat loss will occur and what other impacts will there be on habitats. How that loss will be prevented.

Any potential changes to traffic and associated environmental impacts from that traffic, including vehicle emissions, loss of pervious surfaces due to roads, and emissions from proposed roads.

Any impacts from diesel emissions during construction and after. This should include the increase in black carbon and that pollutant's impact on snow's ability to reflect solar radiation during the winter, thereby increasing heat gain during the winter months.

Any impacts that may contribute to hardiness lines and biomes/ecosystems/biospheres moving further north due to climate change.

Any changes to ecological regions.

Impacts on biodiversity and how those will be prevented.

How impacts on endangered species will be prevented.

How sugar bush will potentially be impacted and how that will be prevented.

How usufructuary rights will be preserved, upheld, and honored. What plan LMC will have in place to ensure that.

How Sacred sites will be preserved intact and how open and free public access to them will be maintained and honored.

How historic sites will be preserved intact and how open and free public access to them will be maintained and honored.

How negative impacts on wild rice waters will be avoided - as well as other negative water quality impacts.

What increases in CO2 and other GHG impacts are associated with this project and how they will be mitigated.

How the project proposers will meet the 1854 Treaty Authority Ceded Territory Conservation Code and any other portion of the 1854 Treaty.

How are you recognizing and protecting the rights of potentially impacted ecosystems to exist, flourish, and naturally evolve?

How will you repair and undo the damages to the ecosystem caused by the proposed LMC expansion?  
How migrations pathways and patterns will be preserved across these lands.  
What light pollution impacts are associated with this project. How light pollution impacts will be prevented.  
Deforestation - what percentage of virgin forests are left in the US and in MN? How old is the forest that will be impacted by this project? How will that loss be mitigated and replaced with similarly aged trees and supporting ecosystem. How will old growth trees be protected from removal and other detrimental impacts? How do you define detrimental impacts? How do applicable rules, regulations, laws define what is detrimental to the ecosystem that will be impacted? How will you preserve the ecosystem that exists in this place now? (comment 1/2)

Sincerely,  
Ms Cassandra Meyer  
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