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Comments: Connie Cummins, Deputy Forest Supervisor,

I urge you to deny the Special Use Permit (SUP) for Lutsen Mt Expansion. Alternative 1--No Action Alternative is the only moral decision here.

I am alarmed by a statement made at the public meeting by Justin Preisendorfer (Superior National Forest) that most SUP's of this type are approved. I have been involved in countless hearings on Draft Environmental Impact Statements (DEIS), Environmental Impact Statements (EIS) and Permits, none of which have gone in favor of the people, even when there is overwhelming opposition. Is this another one of those situations? Or is this true engagement, whereby if the public does not want a project on public lands, then the public takes precedence over the corporation?

I sincerely hope my voice matters. And so I address the SUP DEIS.

First, and foremost, this SUP process must involve meaningful engagement and consultation with the native community and there must be resulting action that reflects the tribes' wishes. We are all treaty people. Superior National Forest has a responsibility to uphold treaties, in this case the 1854 Treaty, and that goes far beyond hiring Juan Martinez, as tribal liaison. Treaties are the Supreme Law of the Land (Article 6 of the U.S. Constitution). The native descendants of the 1854 Treaty have said no, so there should be no further discussion or decision to make. No means No.

Secondly, I am extremely concerned with the DEIS's incorrect premise from Section 3.6.3 page 154 "Given the project's location in northern Minnesota, the proposed projects are not located in climatically marginal areas and are generally not considered at unreasonable risk." This should be struck from the DEIS. Nothing could be further from the truth and you only need to look to those who study Minnesota's climate to learn otherwise. Dr. Lee Frelich, Director of University of Minnesota's Center for Forest Ecology, has stated over and over that Northeast MN is especially vulnerable to warming because it is the southern boundary of the Canadian boreal forest and it is already experiencing warming temperatures. From Lee Frelich, Peter Reich and Rebecca Montgomery, "The southern boreal forest boundary in this region has already experienced significant warming of >1.5 °C [13] and is expected to experience a relatively rapid velocity of climate change for the duration of the 21st century [14]." (<https://www.mdpi.com/1999-4907/12/5/560/htm#B13-forests-12-00560>). That is 2.7 degrees Fahrenheit of warming. The SUP must be re-written to consider all of the cumulative climate impacts of expansion and reflect that as the area warms, the demand for more snowmaking will require more of our precious water from Lake Superior.

Third, Lutsen's "needs" are absurd, and we surely face ecological and climate collapse unless we make decisions that will protect future generations. If you approve the SUP you are putting the need "to improve skier circulation and reliable snow conditions" for a select privileged few, over the needs of the public for clean water, air, soil and a livable climate. The DEIS should take into account the benefits of Alternative 1--No Action Alternative. "There is emerging evidence that the remaining intact forest supports an exceptional confluence of globally significant environmental values relative to degraded forests, including imperiled biodiversity, carbon sequestration and storage, water provision, indigenous culture and the maintenance of human health," Nature Ecology and Evolution (<https://www.nrcm.org/wp-content/uploads/2019/06/A.v.-Watson-et.-al-The-exceptional-value-of-intact-forest-ecosystems-Nature-Ecology-Evolution.pdf>). If approved, do you really think that future generations will look back on this decision to destroy 500 acres of public land, beautiful old growth forest, and be grateful for improved skier circulation?

SE Group (paid for by Lutsen, with offices in VT, CO and UT) has failed to understand the Environmental Impacts of this project. Deny the Lutsen Expansion Special Use Permits.