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Comments: In my opinion, the EIS hydrology report has a highly significant deficiency. It evaluates and projects the impacts of the 3 Alternatives based only on current and historical weather and climate data. It does not address in depth, the expected cumulative impacts of the Alternatives combined with Climate Change impacts, particularly extreme rainfall events. The topography of the proposed project is highly problematic: high pitched slope of the land, the removal of trees and vegetation, the increase in impervious surfaces (parking lots, buildings, roads,) and soils at high risk of erosion. Combined with extreme rainfall events the cumulative impacts will exceed the projections of the hydrology report.

The Poplar River Watershed, which encompasses the Lutsen Mountain area has a history of serious sediment runoff and impairment of water quality, requiring costly mitigation efforts. Lake Superior is already heavily impacted by sediment run off. I am including the following quotes from the Executive Summary, Lake Superior Stream Sediments Assessment: Phase I <https://www.pca.state.mn.us/sites/default/files/wq-b2-04.pdf>).

EXECUTIVE SUMMARY

"At present, 12 of Minnesota's major tributaries draining to Lake Superior are impaired for turbidity, mercury and chlorides as well as low dissolved oxygen, lack of cold water assemblages and pH. Turbidity and excess sediments are the leading causes of water quality impairments throughout the United States and turbidity is identified as an impairment on 10 of the 12 streams impaired along the North Shore. These turbidity impaired streams include the Knife, Poplar, Beaver, Flute Reed, French, Lester, Talmadge and Big Sucker Rivers as well as Amity and Skunk Creeks. Excessive turbidity in these streams is largely dependent on elevated suspended sediment levels..."

"While land use in this area is primarily forested, there are resort developments with associated ski runs, hiking trails, and a golf course complex, along with townhome, single residential home subdivision developments and a road network for access. WEPP modeling identified the largest soil losses due to sheet erosion as coming from the ski slopes."

Further down in this report is the Lower Poplar River Watershed Sediment Source Assessment which provides an in depth study of sediment runoff from Lutsen Mountains.

Given the current problems with sediment runoff from Lutsen Mountains, I think it would be environmentally irresponsible to approve an expansion that would further add to this problem especially because more specific details of Climate Change/extreme weather impacts are unknown.

I think the hydrology report needs to include added impacts of extreme weather events. The following paragraph in the EIS hydrology report vaguely acknowledges potential impacts but does not quantify or make projections:

"As discussed in Section 3.6, extreme rainfall events and flooding have already increased during the last century, and these trends are expected to continue. These expected changes in climatic variables, coupled with continued changes in land uses, are expected to increase mobilization of sediments and could have a direct, negative impact on water quality by increasing the loading of sediment, nutrients and other pollutants into surface waters."

These impacts could be substantial. Neither Alternatives 2 or 3 should be allowed to proceed if these impacts are unknown.