

**RESOLUTION
OF THE
COUNTY BOARD OF COMMISSIONERS
ITASCA COUNTY, MINNESOTA**

Adopted February 23, 2010

Commissioner Burthwick moved the adoption of the following resolution:

Resolution No. 02-10-06 (Page 1 of 12)

**RE: ESTABLISHING FINDINGS OF FACT AND ISSUING A POSITIVE DECLARATION
FOR AN ENVIRONMENTAL IMPACT STATEMENT ON THE DEVELOPMENT
KNOWN AS THE LIVING WORD BIBLE CAMP**

**STATE OF MINNESOTA
ITASCA COUNTY
BOARD OF COMMISSIONERS
FINDINGS OF FACT AND CONCLUSION**

WHEREAS, Itasca County, as a political subdivision, organized and existing under the laws of the state of Minnesota; and;

WHEREAS, The Itasca County Board of Commissioners (County Board) has adopted zoning and subdivision regulations, Ordinance for the Management of Shoreland Areas, Subdivision Platting Ordinance for Itasca County, the Comprehensive Land Use Plan for Itasca County, including subsequent amendments, to promote the orderly, economic and safe development and utilization of land within the county; and;

WHEREAS, Living Word Bible Camp (LWBC), made a proposal to construct a bible camp/retreat center for children and adults. The development will be located on property along the east shore of Deer Lake. Proposed facilities include a lodge with chapel, office, five cabins (dormitories), activity building, storage buildings, recreational facilities, ballfield, campfire area, and a trail system, and;

WHEREAS, The County Board has followed the process outlined in Minnesota rules and detailed in the Minnesota Environmental Quality Board (EQB) document titled EAW Guidelines - Preparing Environmental Assessment Worksheets to complete an Environmental Assessment Worksheet (EAW) for the proposed development by LWBC, and;

FINDINGS OF FACT

WHEREAS, the Itasca County Board of Commissioners has reviewed the EAW and all public comments, and have made the following findings of fact:

1. On April 12, 2006, Ron and Judy Hunt applied for a planned unit development and conditional use permit (PUD/CUP) for the youth bible camp/retreat and learning center on behalf of the Living Word Bible Camp.

2. On May 5, 2006, a Citizen's Petition from the EQB to complete an EAW for the project was received by the County Environmental Services Department (ESD).
3. The County Board considered the petition on May 23, 2006 and determined an EAW was not required for the project.
4. On August 30, 2006, the Itasca County Planning Commission and Board of Adjustment approved the (PUD/CUP) with many conditions regarding allowed uses in the CUP.
5. Representatives for the petitioner challenged the County Board's EAW petition decision in District Court which determined the County Board erred and should have required that an EAW be completed.
6. The District Court's determination was appealed to the Minnesota Court of Appeals, who agreed with the District Court. The July 31, 2008 Judgment indicated the County Board should complete an EAW and that any decisions on the PUD/CUP be vacated.
7. The County Board hired Widseth Smith Nolting & Associates, Inc. (WSN) in January 2009 to complete the EAW.
8. On February 25, 2009, ESD delivered WSN copies of data, testimony and comments received in connection with the prior EAW Petition and court records concerning the proposed project.
9. LWBC provided a packet of information including a draft EAW to the ESD on October 13, 2009. A copy of the packet was forwarded to WSN on the same day.
10. On November 3, 2009, LWBC submitted their wetland delineation report prepared by their consultant, SEH, to WSN.
11. WSN, on November 10, 2009, notified the proposer that their data submittal was complete.
12. The County Board (3:1) approved the EAW for distribution on December 7, 2009.
13. On December 17, 2009, the EAW, completed by WSN and approved by the County Board, was submitted to the Minnesota Environmental Quality Board (EQB) for publication in *The EQB Monitor* of December 28, 2009.
14. Copies of the EAW were distributed and made available to interested persons for comment.
15. A public meeting was held on January 14, 2010 to answer questions and allow comments.
16. Written public and agency comments were received until January 28, 2010.
17. Fifty-one separate comments and/or data submittals were received during the comment period. Those written comments were provided to each County Commissioner contemporaneous with their receipt in the ESD, and thus were provided to those Commissioners on or shortly after January 27, 2010, the date that the 30 day comment period expired.
18. The comments included a 12-page comment letter from the Minnesota DNR concluding "There is a need to further describe various environmental effects from the project and identify specific

mitigation measures that could be included as requirements of project permitting to minimize negative environmental effects".

The concerns raised included:

- Generally - 1) Lack of a site map to scale showing Conservation Easement area, open space, wetlands, location of the ordinary high water level, proposed septic system including replacement site, buildings, all existing ground water wells, roads and parking areas, ball field, trails, and any other structures or proposed development, including dimensions and setbacks as well as shoreline feet in the project area; 2) Failure to indicate the number of people who could be on the grounds at any time; 3) Need to assure that there will be no future stages of this development; 4) Need to require that 245 acres will remain undeveloped as a condition of the County's Conditional use Permit (CUP), possibly through a conservation easement; 5) Failure to specify potential land use conflicts and specific recommendations for mitigation; 6) Lack of a recommendation of specific conditions to mitigate conflicts over surface water use as a guide for final conditions in the CUP; 7) Need to incorporate avoidance and mitigation for soil limitations in trail planning; 8) Requirement to evaluate past, present, and reasonable foreseeable actions (for which a basis of expectation has been laid) that could have cumulative effects; 9) Need to incorporate proposed mitigation of losses to public resources (such as muskie population) in the total project cost.

- Regarding water quality - 1) Minimal increases in phosphorus concentrations can be detrimental to Deer lake; need to maintain much higher water quality standards than the 30 ug/l cited in Appendix F; Need to know the anticipated phosphorus loading from runoff and identify additional mitigation or remediation, and to highlight surface water runoff effects to the adjacent bay; 2) Lack of an actual ISTS Design with sufficient detail to determine its ability to adequately protect surface and groundwater from phosphorus and nitrates in the wastewater; lack of a phosphorus assessment of the proposed septic system and the need for more information to determine the potential for significant adverse environmental effects; 3) Lack of the required preliminary groundwater evaluation; 4) Lack of a management plan and a state-required replacement area for the wastewater system; 5) Need for phosphorus and nitrate assessment of the wetland and rain gardens; 6) Need to include monitoring in the management of the wastewater system and an operational plan to properly treat wastewater, as well as a cleanup plan for the existing site; 7) Need for soil testing for fertility, pesticides and medicine related to fox and mink waste; 8) Need for nitrate testing of existing ground water wells; 9) Need for additional low-impact development practices that reduce storm

water volumes; 10) Inability of the MINLEAP model to predict water quality impacts from a single PUD.

- Regarding fish, wildlife and plants - 1) Need for an assessment of the impacts of proposed boat use on fish, wildlife and aquatic plants; 2) Importance of the bay area to the muskie population in Deer Lake; lack of actual mechanisms for minimizing and avoiding disturbance of the habitat of other muskie population; 3) Lack of clear measures to mitigate the wildlife disturbance caused by more people and boats; need to address the impact of tours of Wildlife Management Area (WMA) islands on nesting and brood rearing wildlife; lack of specific restrictions suitable for minimizing impacts to the WMA islands; 4) Importance of the uncommonly diverse community of aquatic plants in the shallow bay surrounding Ash Island, which could be negatively affected by extensive boat traffic and sediment disturbance.

19. A letter from the Minnesota Pollution Control Agency contained the following comments on the EAW:

- Item 6 - Fails to fully describe features of the construction process that will cause physical manipulation of the environment, particularly significant movement of soils required by two of the buildings. Stockpiles should not be placed in areas designated for infiltration later on. It is noted that there is no estimate for the amount of soil to be removed or the site locations. There is also concern about proximity of soil stockpiles to the wetlands or the lake.

- Item 12 - is unclear regarding wetland impacts.

- Item 16 - Is confusing, regarding when to use erosion control blankets and rapid stabilization. There is also concern about protecting infiltration areas from sedimentation that might cause them to fail in the long term.

- Item 20 - Demolition of existing structures must comply with state and federal regulations regarding hazardous materials, and structure materials should be recycled to the extent possible.

- General - Claimed elements of the design are not reflected in the EAW, particularly:

- a. Protecting infiltration areas during the construction process;

- b. Designating the parking area to keep runoff out of the wetland area to the east;

- c. Creating a snow removal area away from the wetland; and

- d. Incorporating rain collectors at the west facing downspouts of the lodge building, and using the water for irrigation and perhaps flushing toilets.

20. Extensive comments in support of further study and an EIS were received from professionals in scientific fields with relevant credentials and experience:

A. John R. Jones, Ph.D and John A. Downing Ph.D. University Professors of Limnology, giving a scientific interpretation of the report by the Proposer's consulting limnologist and opining that the level of risk to Deer lake is substantial enough to warrant a complete EIS.

B. Richard P. Axler, Ph.D., a professional limnologist with the University of Minnesota-Duluth, opining that the EAW lacks sufficient technical detail and assurances to address the many complex potential impacts posed by a large commercial lakeshore development of this kind.

C. Cinthia Hagley, M.S., Aquatic Ecology/Limnology, Extension Professor, Minnesota Sea Grant, opining that: The Proposer's limnological report raises more questions than it answers, particularly regarding impervious surface impacts; a better limnological report is needed; and an EIS is clearly warranted in this case.

D. Mary M. Blickenderfer, Ph.D., Forest Science botanist and plant ecologist, opining that the EAW is incomplete and failed to adequately identify fish and wildlife resources and habitats on or near the site, particularly the aquatic plant community in Kocemba Bay, which contains alga beds extremely sensitive to disturbance, even by a paddle stroke.

E. Paul Stolen, 1990-2009 Regional Environmental Assessment Ecologist, Minnesota DNR, opining that: the EAW is confusing, has poor technical quality and fails to respond to previous technical input; and the large size of this tract adjacent to a very sensitive lake area justifies an EIS. This 11-page report focuses on: lack of EAW content; non-compliance with EQB rules, including improper reliance on the developer's data and assessment of effects; lack of solid information regarding what is planned for the 253 acres; deference to the Proposer regarding mitigation of potential impacts; decision process for an EIS; and reasons why an EIS should be done.

F. Mary L. Spratt, Ph.D., Professor of Biology, opining that an EIS is necessary to document the existing plant and animal wildlife and determine the impact of the proposed development.

G. Alan W. Cibuzar, CEO, A.W. Research Laboratories and Image Engineering, Inc. noting that the EAW does not: measure setbacks from the Ordinary High Water Mark and the Conservation Easement; address the use of jet boats, jet skis, snowmobiles, four wheelers, golf carts or wheelchairs; accurately estimate the traffic count; or accurately estimate the effluent volumes. He recommends that an EIS could address these and other deficiencies in the EAW and that a representative "Environmental Responsibility Committee" be established to oversee that any approved plan is properly executed.

H. Dennis W. Anderson, Retired MNDNR Regional Fisheries Manager, opining that the EAW fails to adequately address: the potential risk of human disturbance to shallow areas from

having a large number of youth canoeing and kayaking; and the risk to the native, self-sustaining, high quality muskie population in Deer Lake.

I. Randall J. Miles, Ph.D., Associate Professor of Soil Science, regarding the proposed wastewater system, stating that: the sandy soil is the "weak link in the chain" and it is necessary to determine the loading rate to evaluate it; and the estimate of 45 gal/day per capita is probably too low.

21. After receiving public and agency comments, the County Board reviewed the comments to decide whether the need for an Environmental Impact Statement (EIS) existed. The review resulted in a "positive declaration" concerning the need to complete an EIS.

**FINDINGS WITH RESPECT TO THE CRITERIA
FOR DETERMINING THE POTENTIAL FOR
SIGNIFICANT ENVIRONMENTAL EFFECTS**

A. Type, extent and reversibility of environmental effects

1) Past Land Use

Several comments brought up the past use of the property as a mink and fox farm and were concerned about the environmental effects of the manure from this use. The EAW documents that the farm was present over 50 years ago and provides a 1947 aerial photograph showing 12 to 14 pen areas mainly on the east side of the proposed development area. Information received during the comment period indicates the farm had a maximum of 30 fox or mink and 11 cattle at any one time and in later years of operation had no mink or fox, but 4 horses and 5 head of cattle. During the comment period, the proposer submitted analytical results that showed no nitrates in the onsite well and very limited amounts of organic matter in the soil.

2) Fish and Wildlife Resources

The existence of a substantial wildlife management area and approximately 180 acres of shallow lake areas near the development are unique to this project. Specifically, the shallow lake areas are known to be spawning areas for a native population of muskies and resting/feeding areas for waterfowl and other birds. There is a potential for the development and the lake use by campers attending LWBC to have effects on the fish and wildlife use of this area. The extent of these effects needs further study because the effects are not reversible if continued use occurs. There are many other similar camps in Minnesota including church camps and outdoor learning centers such as Deep Portage Learning Center in Cass County and Long Lake Conservation Center in Aitkin County. Additional study can include observing how these camps affect fish and wildlife resources and evaluating potential mitigation measures that could be implemented to limit these effects. The additional

study can include how the residential area immediately north of Kocemba Bay affects the shallow water areas and how the effects could be cumulative with the LWBC proposed development. The study can try to answer the question on how many visits by student tour groups would have an impact on use by fish and wildlife and what damage would occur to vegetation and fish and wildlife habitat by canoes and kayaks. Further study can also include working with the DNR to identify measures that the agency would agree would limit effects of the development.

3) Boat Traffic

Concerns have been expressed by some commenters that boat traffic will affect the shallow water areas north of the development. This issue can be addressed in further study by looking at the potential effects of student tour groups on the fish and wildlife resources. The study, however, can also examine what specific conditions should be included to mitigate surface water use conflicts with other boaters.

4) Surface Water Runoff

Many of the comments received were concerned about surface water runoff to the lake and the affect on water quality of the lake. Some of the comments suggest the stormwater plan was not a detailed engineering design and further design work needed to be completed to address surface water runoff. The Hydrological Summary included in the EAW as Appendix E was prepared by an engineer using standard hydrological engineering methods and software (HydroCAD®) and provides detailed layouts of infiltration areas and wet detention ponds. The Summary is an engineering report that contains detailed delineation of drainage (subcatchment) areas within the development and calculations on the volume and depth of runoff for 2-year, 10-year, and 100-year runoff events. It provides a discussion on the affects of the proposed development on each of the areas. The report documents a post development reduction in the amount of direct runoff to the lake and equal amounts of runoff to the wetland east of the development. The project design includes leaving vegetated buffers along the lakeshore and treating runoff in basins and ponds. As is standard engineering practice, some of these treatment features are designed to overflow to the wetlands, where the runoff will be further treated. Limnologist, Carolyn Dindorf, has agreed the lake is sensitive to nutrient inputs, but indicates "the phosphorus input to the lake from site runoff is expected to (be) minimal to none". The Itasca County Soil and Water Conservation District (SWCD) in their EAW review comment letter indicated the development has sound land use management practices that would reduce nutrient loads to Deer Lake. Even so, further study can look at alternatives that locate the development area farther from the lake, where no direct runoff to the lake can occur.

5) Water Quality Wastewaters

Several of the comments received were concerned about the capability of the soils to handle wastewater disposal on the site. The EAW pointed out that a groundwater mounding assessment needs to be completed to assess the design of the system and that MPCA be contacted to determine if a phosphorus assessment needs to be completed. These items can be completed as part of a study and alternative site developments can be explored and compared to the proposed development. Alternative locations for the subsurface sewage treatment system can also be assessed during further study.

6) Visual Impacts

There is a potential for some long term visual impacts due to the lodge and activity building being 30 feet and over in height in a natural setting. Further study can look at options that might reduce this impact.

7) Traffic

Some of the commenters were concerned about the potential traffic on Baker Road. Further study can assess the effects the different alternatives may have on traffic on Baker Road. Additionally, further study can also provide more information on traffic volumes and patterns by looking at other similar camps and outdoor learning centers.

B. Cumulative potential effects of related or anticipated future projects

Cumulative potential effects are significant and will need to be identified by further study. The fact that additional buildings are permitted without review and previous plans submitted indicate reasonable expectation of future development on the site. The number and regularity of permits and variances and subdivisions applied for through the Environmental Services Department should be reviewed as an indication of historical and future development on Deer Lake.

C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority

The CUP process can mitigate some of the environmental effects the project could have by putting conditions in the CUP that limit use or development area. Further study can assess the effectiveness of different conditions of the CUP. Additional study can also assess how other permits, such as the NPDES Construction Stormwater Permit, can be used to provide mitigation to specific environmental effects and assess what alternative may be the easiest to permit.

D. The extent to which environmental effects can be anticipated and controlled as a result of other environmental studies undertaken by public agencies or the project proposer, or of EIS's previously prepared on similar projects.

The Itasca County SWCD has recently received a grant to look at nutrient loading in Deer Lake. This study may be of use during any further studies for LWBC. An EIS completed for the Blue Heron Bay development on Dead Lake in Ottertail County has a study on boat use and mitigation options for a proposed development near a shallow natural environment portion of Dead Lake that could be used to augment the information and conditions in any CUP for LWBC.

E. During the meeting, Commissioner McLynn provided her written analysis of the factual information developed in the process, together with her conclusions on the environmental impacts arising from the project, to the remaining commissioners. She asked that the Commissioners join with her analysis by including her findings and conclusions as part of the Board's findings and conclusions. The Board upon a vote of 3:1 agreed to that request. Commissioner McLynn's analysis and conclusions are set forth in Exhibit A and are incorporated by reference into these findings and conclusions.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of Itasca County, Minnesota, as follows:

1. The County Board has jurisdiction in determining the need for an EIS on this project.
2. Areas where the potential for significant environmental effects exists have been identified through the EAW process.
3. Based on the criteria established in Minn. R. 4410.1700, the LWBC project has the potential for significant environmental effects.
4. Additional study of certain environmental issues in these Findings of Fact should be considered as part of an EIS.

Commissioner McLynn seconded the motion for the adoption of the resolution and it was declared adopted upon the following vote:

Yeas <u> 3 </u>	Nays <u> 1 </u>	District #1 <u> Y </u>	District #2 <u> Y </u>
Other <u> 1 </u>		District #3 <u> Y </u>	District #4 <u> ABSENT </u>
		District #5 <u> N </u>	

STATE OF MINNESOTA
Office of County Coordinator
ss. County of Itasca

I, IRENE C. KOSKI, Coordinator of County of Itasca, do hereby certify that I have compared the foregoing with the original resolution filed in my office on the 23rd day of February A.D. 2010, and that the same is a true and correct copy of the whole thereof.

WITNESS MY HAND AND SEAL OF OFFICE at Grand Rapids, Minnesota, this 23rd day of February, A.D. 2010.

Irene C. Koski / by Alexis Haldy
Coordinator

By _____ Deputy

EXHIBIT A

To: Board of Commissioners
Re: LWBC EIS and Findings of Fact
Date: February 22, 2010

From: Catherine McLynn, Commissioner District 2 Catherine McLynn

After reviewing public comments on EAW for Living Word Bible Corporation's proposed commercial planned unit development on Deer Lake, I have found evidence of the potential for significant negative and irreversible environmental effects which may or may not be effectively mitigated. Ordering an EIS is warranted for the following reasons as identified and more fully detailed in the EAW and/or public comment letters.

Item 6 Project description is not complete. (DNR, MPCA, Stolen, Newton, John Erickson, Maxeiner, Duxbury, Widen, Axler, Hagley, McLynn, Cibuzar, LeWin, Hunt, Nemeth, Ratzlaff and Bogenrief)

- a. Maps are not to scale and/or lack detail or are conflicting in detail.
- b. Number of acres is uncertain due to conflicting information.
- c. Ordinary High Water Mark is not identified and needs to be delineated for entire acreage.
- d. Construction operations are not detailed.
- e. Wetlands need to be delineated for entire acreage.
- f. Trail and footpath design and construction needs to be detailed. Number of ball fields is not clear.

Item 8 Need for a resort license confirms the level of expected commercial operation. (EAW, McLynn)

Item 9 Land uses, current and recent past, indicate that the proposed project has a potential for significant environmental effects. (EAW, DNR, Newton, Maxeiner, Duxbury, Agvise, Cibuzar, DLA Pres. Routt, Nemeth)

- a. Past land use included animal farming possibly contributing to high phosphorus and nitrate levels. Additional soil testing in the construction area and well water testing are needed to determine if there is the potential contamination of drinking water and the water quality of Deer Lake.
- b. Seasonal cabin use by Maxeiners limited activities and use of lakeshore. Project is a major change.
- c. Conservation easement with Minnesota Land Trust est. 2001 prohibits commercial use
- d. Acquisition and establishment of AMA/Kocemba Bay are evidence of historical protection of sensitive bay and islands.

Item 11 Impacts on fish, wildlife and ecologically sensitive resources, shoreland and habitat are one of the most consistently identified issues that needs to be more completely analyzed and assured mitigation measures detailed. (EAW, DNR, Minnesota Land Trust, Stolen, Newton, John Erickson, Maxeiner, Duxbury, Peters, Meland, Spratt, Axler, Blickenderfer, Dziuk, Hagley, Thompson, Osgood, Kavanaugh, Sundin, Widen, Detrick Realty, Cibuzar, D. Anderson, Jones, ICOLA, DLA-Routt, Nemeth, Holmbeck)

Item 12 Impact on water resources especially the interior wetlands that are part of the flow to the lake needs to be fully studied and assured mitigation measures taken. (Many of the same as #6 and #11)

Item 13 Water use of the proposed project is proposed to be significant increase over past use i.e. private single family to public use. Groundwater evaluations, aquifer levels need to be determined, variance for the well and hydrology license must be applied for or plans for alternatives need to be determined. (EAW, MPCA, DNR, McLynn, Spratt, Newton, Cibuzar, LeWin)

Item 14 Land use district incompatibility needs to be resolved. (Stolen, Newton, John Erickson, McLynn)

Item 15 Water surface use is a major change from past uses with significantly impacts as noted in #11 above.

Item 16 Erosion and sedimentation are likely to be significant and will contribute to #11 and #12. Detailed and correctly constructed basins and other safeguards during and after construction need to be determined. (MPCA, DNR, Stolen, Maxeiner, Duxbury, Peters, Spratt, Voedisch)

Item 17 Water quality of Deer Lake and adjacent wetlands will be significantly affected by surface runoff and assured mitigation measures need to be identified. A SWPPP needs to be designed by professional engineer using appropriate and accurate hydrology reports. Soil tests indicate high phosphorus levels. (EAW, DNR, Stolen, Newton, John Erickson, Dziuk, Axler, Hagley, Duxbury, Peters, Spratt, Dindorf, Hunt-Agvis, Cibuzar, LeWin, Jones, Osgood, Downing, Voedisch)

Item 18 Water quality of Deer Lake and adjacent wetlands will be significantly affected by wastewater. The size and location of the septic system for such a large project, tree and vegetation removal for construction, numbers of individual users, management and maintenance plans need to be identified and assured mitigation measures determined. (EAW, DNR, MPCA, Stolen, Newton, John Erickson, Spratt, Peters, Maxeiner, Duxbury, Peters, Widen, Dindorf, Newton, Miles, Cibuzar, LeWin, Jones, Downing)

Item 19 Soil conditions need to be clearly identified as they affect rates of nutrient absorption and surface runoff that will significantly impact #11, 17 and 18 above.

Item 20 Hazardous wastes disposal during demolition and storage tanks were identified as issues that needed further study. The above ground storage of 600 gallons of gasoline has the potential for pollution or explosion. (MPCA, John Erickson, McLynn, Widen)

Item 21 Traffic on Baker Road, parking roads within the project need to be clearly identified and impervious surface determined. (EAW, Newton, Youngberg, Maxeiner, Duxbury, Widen, Cibuzar, LeWin, Voedisch)

Item 24 Noise levels need to be studied and assured mitigation measures identified. (Newton, Youngberg, Spratt, Duxbury)

Item 25 Unique resources are nearby and within the direct impact area. They will be significantly affected by camp activities and proposed tours into the sensitive areas. (Stolen, Newton, John Erickson)

Item 26 Visual impacts will require assured mitigation measures. (EAW)

Item 27 Compatibility with plans and land use regulation is clearly a big issue that needs to be resolved. Inconsistency with the Comprehensive Land Use Plan and restrictions in the 1998 ordinance need to be addressed. (Stolen, Newton, John Erickson, McLynn, Dziuk, Widen, Detrick Realty, Allen, Voedisch)

Item 28 The proposed project is requiring and will continue to require increased demand on public services including but not limited to Itasca County Environmental Services, Highway, Attorney and Sheriff departments to implement zoning and permitting, road work, dust control, resolve legal issues, fire and emergency response and law enforcement, respectively. Additional increased services are being demanded of MPCA, MDH, DNR and SWCD. (EAW, DNR, SWCD, MPCA, MDH, Medure, Newton, McLynn, Widen, Spratt)

Item 29 Cumulative potential effects are significant and will need to be identified by further study. The fact that additional buildings are permitted without review and previous plans submitted indicate reasonable expectation of future development on the site. The number and regularity of permits and variances and subdivisions applied for through the Environmental Services Department should be reviewed as an indication of historical and future development on Deer Lake. (EAW, DNR, SWCD, Stolen, Newton, Nemeth, John Erickson, Widen, Spratt, Peters)