

EAW COMMENTS/RESPONSES - STAR LAKE CASINO (7/13/2017)

COMMENT ID	REVIEWER ID#	LOCATION IN EAW	Category	SUMMARY OF ORIGINAL REVIEW COMMENT	RESPONSE
5	3	General	GEN	Considers the EAW to be thin, states opinion that the development is bad for Star Lake and is opposed	
11	4	General	GEN	Tribe should be allowed to govern itself and decide how to proceed	
12	7	Proposer	GEN	questions the validity of the White Earth Enterprises LLC as proposer	
13	10	General	GEN	Negative environmental impacts of the project should be investigated by the government on how they will affect the environment, road system, taxes, and job market. Increased boat traffic on the lake affecting fishing and recreations. Asks that we do what's necessary to ensure the lake and surrounding area are not damaged by the project.	
14	12	Page 12, "Plans Compatibility"	GEN	Page 12 says there was a meeting for public input but he said there was hardly any time for the public to submit their input. Instead it felt like it was all structured to share results of the Plan. Doesn't feel there was really an intent to gather public input by the partners.	
15	12	Page 6, section E	GEN	Asks the question: What happens if the project is not successful and/or abandoned prior to full completion? Will the land be restored to its native state? Who has the responsibility to monitor such restoration? Points to Minnesota Rule 4410.0200, subpart 60 and 9c, which requires ALL parts of future/possible actions be reviewed as part of a single project (i.e., potential RV expansion, additional cabins, golf course).	
16	12	Page 39, section c.	GEN	What will be the tax impact for the county and state taxpayers for road changes and upgraded maintenance as traffic increases due to the casino? The plan for road changes and updates should be expanded along with cost information within the context of an EIS.	
17	13	General	GEN	Would the Fee Land remain or would it be put into Trust Land to avoid paying real property taxes and special assessments? (with excerpt from Code of Federal Regulations, Title 25, Chapter 1, Part 151, Subchapter H, Section 151.11 Off-reservation acquisitions.)	
18	13	General	GEN	What is going to be done with the infrastructure (roads) leading to the proposed casino site? If you have big heavy trucks hauling dirt to fill in the wetlands then who will be responsible for repairing or improving those roads? The taxpayers should not be burdened with this responsibility we are already paying a considerable amount in real estate taxes for our property.	
19	13	General	GEN	Where would the additional man power come from for policing as well as emergency medical services? Who would pay for these services, hope it would not be put on the tax payers of Otter Tail County.	
20	13	11 (b) (i) (iv)	GEN	There is also a great concern regarding retention ponds, potable water, raw water wells, waste water treatment system with regard to who would be overseeing this to make sure that there would be no waste entering the lake?	
21	14	General	GEN	Concerns about keeping rural Minnesota rural without commercial buildings and parking lots of this size. As she works at a land surveying company she understands all that goes into this work and "it blows [her] mind that an EIS would have to be demanded by the county tax payers when it should just be an automatic requirement for a project this size." Concerned about how the road upgrades will be funded, doesn't think it should be tax payers because they don't need upgrades for their use, only the casino does. Fears an increase in drug and alcohol use with a casino.	
22	17	General	GEN	Replacing wetlands with 15.5 acres of impervious surface will lead to over 11 million gallons of unfiltered water draining into surrounding wetlands and Star Lake. Run off ponds in Becker and Roseau will do nothing for the quality of Star Lake. The proximity of the planned water runoff holding ponds and the seasonable high ground water table are not adequate per the MPCA. The EAW does not explain how the development will handle the increase runoff so an EIS is necessary.	
45	17	General	GEN	Waste water treatment plan is extremely worrisome. The EAW says the current plan of locating the waste-water treatment area adjacent to the wetland is "the most adequate means of managing site waste water," "the most adequate" is not synonymous with safe. Unlike other cities with similar systems, this one is directly adjacent to wetlands and a lake, meaning any failure can lead to health hazards for resort goers and landowners. Animals who live in and rely on the lake will be negatively affected by an increase in the growth of algae. An EIS is absolutely necessary to prevent these risks or find a better alternative.	
49	19	Item 1 Pg 1 Title vs. Pg 3 Description	GEN	is this a casino or a resort? These are NOT synonymous or interchangeable.	
50	19	Item 2 Page 1	GEN	The proposer is not identified, only a contact person is. Per Minnesota Rules 4410.0200 Subpart 68, the entity that applied for or would receive the approval for the project and not a consultant, attorney, or other entity or person representing the proposer should be listed. What entity is the proposer? Different ownership titles on various parcels of land make it confusing as to who the ultimate project proposer is. What are the implications of having a project that spans multiple parcels, different landowners, and different jurisdictions?	

51	19	Item 6b Page 3	GEN	More details should be provided about the resort amenities and what phases they are planned for. Especially for what type of gaming they are planning and the size of crowds expected. An outdoor community theater is mentioned for the first time, more information about the size, noise level, and events/activities is necessary.
52	19	Item 14 Page 34	GEN	What is the proposer's strategy for protecting and preserving (not destroying) historical and archaeological sites and artifacts?
53	19	Item 18, Page 39	GEN	Traffic during construction and once operational is a major concern due to the tight, curvy roads and their limited visibility. The primary roads are discussed in the EAW, but smaller, local township roads need to be addressed as they are commonly used by pedestrians. This project does meet the NEED for an EIS.
54	20	Item 8	GEN	The project will require a Clean Water Act Section 401 Water Quality Certification (401 Certification) or waiver from the MPCA to verify compliance with state water quality standards.
55	20	Item 12	GEN	Concern that ESA investigations were not sufficient. Recommends the project be enrolled in the MPCA's Brownfields Program to receive liability assurances and assistance to manage ground contamination. Page 28 says the MPCA stated "the project site location does not require additional corrective action." Clarification that this was in regards to surface spill from a tank and not in reference to the other areas of concern identified at the project site.
60	22	Page 1	GEN	Liz Foster-Anderson is no longer serving as the Executive Director of the White Earth Enterprises, LLC, and therefore cannot be the "contact person." White Earth Enterprises, LLC is not registered with the MN Secretary of State as either a domestic or foreign entity. As of June 16, 2017, Central Minnesota Land Company LLC has an inactive status with the MN Secretary of State and was dissolved on March 1, 2017, making it questionable if the organizations are stable enough to complete the project. Should the project continue, the OTC should require deposits and monetary insurance to protect the county and taxpayers. Project Location section includes an erroneous Tax Parcel Number for the fourth parcel listed. The EAW was certified as complete and accurate.
61	22	Page 7	GEN	The land was designated to the Minnesota Chippewa Tribe. There is no legal documentation from the Minnesota Chippewa Tribe granting the WEB authority to develop this property commercially for a single band.
62	22	Pages 1 & 40	GEN	The omission of the Fee Land Parcel acquired by Central Minnesota Land Company LLC is extremely significant. Developers bought this parcel as part of their quiet (secret) acquisition. This is very material as it provides the proposed "family resort" facility with extensive potential future development and lake access which is ignored in the EAW. This is misleading as the EAW says there is no known future projects in the vicinity.
63	22	Page 6	GEN	The EAW requires a full disclosure and analysis of potential effects of potential future expansion now, not when those projects begin later.
64	22	Page 8	GEN	EAW says the project will receive no federal or state funds, but the project includes substantial electrical line and substation requirements provided by Lake Region Electric Cooperative, which is a substantial recipient of subsidized federal gov. financing through the Rural Electrification Administration.
65	22	Pages 8 and 10	GEN	The adjacent land use is minimized in the EAW, including the most densely populated parts of Star Lake. A comprehensive EIS would acknowledge and examine the existence of more than 120 year-round and seasonal residences, small resorts, and church camps in close proximity to the project site. EIS should study the effects of traffic, noise, sewage pond odors, public safety, loss of enjoyment, crime, and property values in relation to these residences.
66	22	Pages 9 and 12	GEN	The EAW contains a material and misleading error where it incorrectly states the OTC and WEB adopted the Limited Star Lake Comprehensive Plan on Jan. 3, 2017, when it did not adopt the plan. The EAW analyzed historical average traffic counts, not the frequency and impact of peak traffic conditions. The 24-7-365 casino with special weekend and holiday events will result in higher traffic levels and peaks. The Plan does not adequately address costs and sources of funding and provides no assurance that the identified social, safety, and infrastructure concerns can or will be actually addressed. The Plan has no legal standing and there is no definitive plan to resolve issues identified.
67	22	Page 9	GEN	The EAW says Star Lake is large and highly developed, nothing could be further from the truth. The south arm should be protected as a Natural Environment body of water. It should be protected through the application of Natural Environment Standards as it was in 2010 in the DuCharme campground proposal. An EIS should be ordered to included analysis under the Natural Environment Standards. Even though OTC has no control over what happens on federal Trust Land, as the RGU it should consider the cumulative effects of the total project as what happens on Trust Land doesn't stay on Trust Land.

68	22	Page 27	GEN	<p>An EIS would require an analysis of project alternatives, including the environmental conclusions under a "no-build" scenario.</p> <p>There are reasonable project alternatives that have not been evaluated or disclosed by the proposers which could substantially reduce the disturbance of the environmentally sensitive south arm of the lake. The proposed dredge and fill of the 14.5 acres of federal Trust Land could potentially be eliminated.</p> <p>The EAW requires discussion of how the project will change the number or type of watercraft on any body of water. Their statement that no increase in watercraft on Star Lake ignores their ownership of the lakeshore and potential docks that may be built there. There will be an increase of "gawker" traffic and curiosity seekers which is not taken into account.</p> <p><u>Float plane traffic, ATV, and snowmobile traffic in the arm need to be addressed.</u></p>
69	22	Page 36	GEN	<p>The issue of lighting is lacking detailed analysis considering its potential impact. A lighting plan, including its effects on migrating and nesting birds, should be available to the public.</p>
70	22	Page 38	GEN	<p>The odor and noise impacts are minimized by the proposer. The negative effect on the Environment and Neighborhood from promotional entertainment should be disclosed.</p>
71	22	General	GEN	<p>The EAW does not discuss the potential for proposed dredge and fill activity involving 450,000 +/- cubic yards of sand and gravel fill to result in pressure related elevation and rotational shift. Meaning sand bars or lakes may be formed in the lake, such as when it happened with the County 41 bridge.</p> <p>The size and scope of the project and incomplete consideration of detrimental social, economic, safety, and infrastructure issues on the surrounding townships require the rigors of a full EIS.</p> <p>The entire project needs to be considered as a whole entertainment complex, and all alternatives which could minimize the detrimental environmental consequences should be <u>identified, evaluated, and considered.</u></p>
76	23	Pg. 1 Paragraph 5 - Location	GEN	<p>The fourth Fee Total Land is misidentified as 5600150108001, it should be 56000150108001. what other mistakes are there in the EAW?</p> <p>The 12.4-acre parcel on the lakeshore is not listed. Is this a mistake or intentionally omitted? MN Rules 4410.4400 speaks to the requirement of connected actions or phased actions being included in the cumulative effects of the project. It would be less than honest for the proposer to suggest that this parcel is not related/connected to the total project because of how much they paid for the land (shows intention of utilizing it), it would provide access to the main basin of Star Lake for guests, and the recreational access to the lake negates the proposer's suggestion that there would be "no significant change in the number or type of watercraft on Star Lake."</p>
77	23	General	GEN	<p>USACE closed the Dredge and Fill permit application file. OTC should be careful about doing anything until USACE makes a decision on the dredge and fill permit.</p> <p>White Earth Enterprises LLC is not registered with the MN Secretary of State, shouldn't this be a point of concern for OTC?</p> <p>The Central Minnesota Land Company has an inactive status with the MN Sols.</p> <p>Liz Foster-Anderson is no longer employed at White Earth Enterprises, and she was project manager for the proposed development.</p> <p><u>These last three taint the credibility of the proposer's organization and its plans.</u></p>
81	25	General	GEN	<p>The original purpose of the land was for wild rice harvesting and should remain so. Continue to be good stewards of our resources. Recommend an environmental impact <u>statement be completed.</u></p>
82	26	Water Resources	GEN	<p>The destruction and filling of 7.4 acres of critical wetlands to the south bay of Star Lake and disturbance of another acre for a period of time during construction are the most important issues to Star Lake and Dead Lake property Owners. The effects caused by destroying these wetlands need to be further examined.</p> <p>The Wastewater System proposal may meet MPCA requirements and other communities use them, but the location of the system raises an issue. If there was a failure it would have negative impacts on the water quality of the watershed.</p> <p>Stormwater runoff during construction and after completion is another major concern.</p> <p>Overland flows into Star Lake or unnamed lake are a concern due to the exposed soil. The biggest concern is whether the plan is implemented by the developer and is inspected on a <u>regular basis to maintain compliant with their plan.</u></p>
83	26	Cumulative Potential Effects	GEN	<p>The EAW states that there will be no accumulative effects from foreseeable projects. This is completely false due to the fact there is planned expansion to development. There are going to be accumulative effects and this should be part of the current EAW. This is a <u>requirement but it was omitted from the proposal.</u></p>
89	28	General	GEN	<p>Increased traffic volume on Hwy 41 will pose a safety risk as it is the only corridor to our lake access.</p> <p>The increased boat traffic and the likelihood of contamination of our lake by AIS is also a concern.</p>

90	29	General	GEN	<p>This area is a special wetland in a very rural area. It should remain a wild rice field as part of their cultural heritage of harvesting wild rice to be passed on to generation after generation.</p> <p>Wetlands can be easily destroyed by stormwater runoff from impervious surfaces. The stormwater ponds planned to treat stormwater runoff is not adequate to treat a back to back big storm or an above average wet season. These need constant management and MN spends millions each year trying to clean up its lakes in Mpls. and St. Paul.</p> <p>Wetlands are home to many plants and animals and are important to the migration of birds. Once destroyed they can't be recreated.</p> <p>The open water treatment of the sanitary sewage system is not adequate for the amount of water that will be directed to them. The odor will be unscrupulous. If there is runoff into the lake from the sewage system it would be devastating.</p> <p>How will the impervious surfaces be managed during the winter? Over salting will harm the environment.</p> <p>Light pollution will destroy the night sky by removing the view of the stars. This will also mess up bird migration.</p> <p>Algae in the south arm will multiply and explode due to the phosphorous, sediment, and chlorophyll.</p> <p>Mark Dayton issued an executive order to avoid direct or indirect impacts on wetlands. Minnesota Statutes section 103A.201 subd. 2b states that wetlands of MN provide public value in many ways.</p> <p>I hope the EIS will be ordered for this proposed development.</p>	
91	30	General	GEN	<p>An EIS must be completed before this project moves forward.</p> <p>The proposed casino, hotel, bar, restaurants, RV park, event center, and supporting infrastructure do not fit the area and its sensitive lakeshore environment.</p> <p>Reasons include: negative effects on the wetlands, water treatment and runoff concerns, and the roads are not large enough to handle the additional traffic during construction and after opening.</p> <p>Concerned with how this will affect bird flyways, nesting areas, and fishing.</p> <p>Concerned about wetland dredging and filling.</p> <p>Concerned about wastewater treatment and possible runoff - it will harm the pristine Star Lake and the waters it outlets to.</p>	
92	31	General	GEN	<p>A majority of the landowners care about preserving and protecting the lake for future generations and believe it should be classified as Natural Environmental instead of General Development. Lists multiple references to articles or hearings saying the south and west arms of the lake are fragile and should not be developed on simply because they are classified as General Development. The EAW doesn't address recommendations made by the DNR to conduct surveys or studies on the project area.</p> <p>A survey of the South arm per the Minnesota's Sensitive Lakeshore Identification Manual" should be performed.</p> <p>75% of the project area will be disturbed during construction.</p> <p>Do not trust the 18-month construction time estimate based on the Bagely Casino. What happens if there's a work stoppage? What if the duration is significantly longer than planned?</p> <p>What is the estimate number of heavy truck trips to the site/yards of fill? How much construction equipment will be transported there?</p> <p>What is the environmental impact of this much disturbance over this duration of time? Has an "Extractive Use Site Development and Restoration Plan" been prepared?</p>	
93	31	General	GEN	<p>All of the numbers in the Combined Shoreland Development Area east of County Rd 41 are incorrect, should we trust any of the numbers?</p> <p>Are there really only 12.56 acres of the 20.2 acres of impervious area in the 1000' SMO zone?</p> <p>Should we be combining the measurements for Star and Unnamed SMO zones or evaluating each of them independently?</p> <p>Are concrete lined wastewater and stormwater ponds really pervious surfaces?</p> <p>Should we be including wetland areas that are to be dredged and filled in the calculation?</p> <p>Has anyone validated the accuracy of the measurements?</p> <p>What if thousands of gallons of sulfate-rich wastewater were inadvertently discharged into the lake or wetland?</p> <p>This project will completely change the hydrology of this important wetland buffer area.</p> <p>We request that Otter Tail County require an EIS be completed.</p>	
96	32	General	GEN	<p>Much of the area relies on the lakes. The land shouldn't be sold off to build on it. If it goes to an EIS, I know that it won't fly</p>	
97	33	General	GEN	<p>An environmental study must be done as no individual would ever be allowed to fill in several acres of state-owned lake, so why would this commercial venture be allowed? We live on Hwy 41 and do foster care so new children have to learn to be careful crossing the street. People already ignore the 35mph, with a casino it would be even more dangerous. Star Lake is envied by area lake residents that wish their lakes could be as clear as Star. Let's keep it that way.</p>	
98	34	General	GEN	<p>Consider the environmental impact of this casino complex in this pristine lake area. I don't think any rules, regulations, or restriction can protect this area from what the damage could be in this sensitive lake area. 24-hour lighting non-stop will change the landscape. The odor from lagoons, the huge increase in traffic is a safety concern of major proportion, and water and land pollution.</p>	

99	35	General - Interview with MN DNR	GEN	Star Lake is one of only four sites in Otter Tail County specifically identified as a destination for harvesters. Motorboat use can be very damaging to wild rice. All stages of wild rice growth provide food resources [to waterfowl]. It is also a breeding and nesting area for many species. 17 species of special concern use wild rice (listed in Tomorrow's Habitat for the Wild and Rare).	
100	35	Page 10, section 9b.	GEN	Statement claiming the project is compatible with the existing land use is false and inaccurate because: LSLCP is not an accepted guidance plan by the county, nor did the proposer or county allow the current users of the area a representation in the process.	
101	35	Page 25 section 11	GEN	None of the water quality, wild rice, wildlife and fisheries, or recreations increases are adequately or accurately represented in the EAW.	
102	35	Page 19	GEN	As the RGU it is OTC's responsibility to protect the fragile ecosystems and environment. This waste water system is different from those mentioned in the EAW because it is for a private, not dependent on this location, and the other 37 are not this close to sensitive wetlands. The Project puts undue threats on the environment with this waste water system. OTC should demand an EIS	
107	36	General	GEN	Commissioners in Mille Lacs County says we should do whatever we could do to stop the casino.	
108	37	General	GEN	We are concerned about a project that will ignore all laws/rules that protect Star Lake's quality. The impact on the habitat of south arm has the potential to reduce, fishing, hunting, and wildlife observation. Traffic safety. A failed pond would do irreparable damage to the lake. Reminder of Dead Lake project's failure due to not having an EIS and how it cost the taxpayers' money.	
109	38	General	GEN	Future development should be planned now, not reactive to this project	
110	38	Page 1 - Intent	GEN	A study whose projections and conclusions are based on many assumptions and projections has no merit as a document to support the developer's EAW. Ask the commissioners to require the developer to build its case on fact and science, not on projections found in a document not officially adopted by the RGU. An EIS should be used to support the proposal.	
111	39	General	GEN	Building a casino on the lake will do harm to the natural beauty and ecosystem of the area. Driving to Star Lake is not easy, it's dangerous, especially if people are coming from a bar. The cost to improve Hwy 108 would be cost prohibitive. The casino doesn't fit in a rural area. Do an EIS!	
112	40	Pages 18-20	GEN	Odor control needs to be addressed, it will reduce quality of living in the area. The fact that there are no limits for contaminants is concerning. What risks are there associated with both shallow and deep wells? General concerns about irrigating the irregular shape of the 65.5 acres. Will there be a permanent waste water treatment easement over the 65.5 acres of irrigated land? What assurance does the county have that this land won't be modified in the future?	
113	40	Page 23	GEN	How will the added demand on the lower aquifer impact the shallow well's quality and availability of water? Would the drawdown of the new wells be noticeable/detrimental (for example, White Bear Lake)	
114	40	Page 12, "Plans Compatibility"	GEN	Would the 24-hour action light be a traffic distraction and impact the south arm?	
120	41	General	GEN	The 65-acre field that the waste water is going to be irrigated on has not had a good crop for many years because it's always too wet. Concerned there will be runoff into nearby wetlands with extra 12 inches of waste water is put onto it. Center pivots will be stuck and it will be a mess. An EIS must be done before this project can move forward.	
121	42	General	GEN	Water quality issues and the effect of wildlife habitat are big concerns. Taking away wetlands that filter water and are habitats will have a devastating effect for Star Lake. Careful environmental study is necessary for replacing and maintaining them. The water quality has deteriorated over the years, fewer wildlife and fish, and this has been a disturbing trend. The impact of environmental pollution and development has already taken a big toll on Star, a casino will speed up the environmental degradation. The "minimum requirements" should not be the bar for how close the waste water system will be to the lake. The lights and noise will ruin everyone's experience of the lake. Not compatible with the area's character or experience people expect to have at a lake. An EIS needs to be done.	

122	43	General	GEN	<p>Letter talking about the County/Government's authority over the land owned by WEN, and how it will affect the need for an EIS.</p> <p>County needs to know exactly where the boundary separating the trust land from the fee land is - the EAW is deficient in not adequately identifying the western boundary line.</p> <p>EAW incorrectly presumes the county has no jurisdiction over Trust Land. State regulatory control may be exercised in the interest of conservation.</p> <p>The EAW doesn't identify what components should be considered in conducting a balancing test to determine to what extent the County can consider the environmental impacts of the development and EIS is necessary to address this issue.</p> <p>Federal jurisdiction is not mentioned in the EAW.</p> <p>The EAW is deficient in discussing permits and approvals required.</p> <p>The state's interest in protecting natural resources weighs the need for an EIS more.</p> <p>EAW is deficient in addressing the cumulative impact for both the Trust and Fee lands.</p> <p>EAW is deficient in naming the proposer and necessary relationship that will have to be developed between the proposer, the WEN, County, and LGUs to support the project.</p> <p>Boating impacts on Star and Dead Lake are not adequately addressed in the EAW</p> <p>The proposer has not shown there are no potential significant environmental issues and an EIS should be ordered.</p>
123	44	General	GEN	<p>Recalled the trailer park being prevented a few years ago because West Arm would not be able to handle all the traffic generated, nor would the wildlife that inhabits this area. It was not compatible to the surrounding area. We now face the same dilemma, only on a much larger and more dangerous scale.</p> <p>South Arm is vastly important to countless birds, waterfowl, deer, and other wildlife. It's also important to fish as it is a spawning ground. The aquatic plants keep Star Lake clean.</p> <p>If the casino is built, the impact to the area would be substantial and irreversible. A casino is truly incompatible with the existing character of the site and surrounding areas.</p> <p>The roads are dangerous enough as it is.</p> <p>Please recommend an EIS be completed before it's too late and we are unable to go back.</p>
124	45	General	GEN	<p>Of note here, the federal grade and fill permit application on this parcel is temporarily closed due to lack of required responses from the proposer to the public comments submitted by the public las November. Many of those comments were environmental concerns and bear directly on tonight's discussion would have been nice to examine those responses as part of this EAW process.</p>
125	45	General	GEN	<p>...there are those who feel OTC has no control over what happens on the federal trust land and that OTC jurisdiction applies only to the fee land. In part this is true. But in very important part, is not true. In reality, your roll as RGU requires you to consider the full cumulative effects of the total project. What happens on the Trust Land does not stay on the Trust, and visa versa.</p>
126	45	General	GEN	<p>We must all be sure we have done the best scientific and fact-based analysis possible.</p> <p>Much of the EAW is speculative without critical sceintific analytical support.</p>
127	45	General	GEN	<p>I submit there are reasonable alternatives that have not been considered by the proposers which could reduce the disturbance of the environmentally sensitive south arm of the lake. The proposed dredge and fill of the 14.5 acres of federal Trust Land could potentially be eliminated. For example, if the proposers scaled down their project and divided it-gaming only to the more suitable northwest corner (only) of the Trust Land and a more modest resort facility on the buildable portions of the Fee Land. This approach might eliminate-or at least limit-intrusion in the south arm marshes to the square footage required for gaming only.</p>
132	46	General	GEN	<p>Documentation providing various tribal proclamation procedures and BIA documents on Guidance on Processing Mandatory Trust Acquisition.</p>
134	48	General	GEN	<p>...who is the new Shooting Star Casino going to benefit?</p>
135	48	General	GEN	<p>There are also problems with the viability of the project's business model. The proposed site is literally in the middle of nowhere - a 30 minute drive from the nearest interstate highway, down a poorly lit two lane road, and at least 90 minutes from the nearest major population center. The location raises the obvious questions of where the gamblers will come from and how they will get to the casino.</p>
140	49	Item 10 Page 8	GEN	<p>Soil characteristics: % of soils with high potential for erosion = 1.5%; with potential for medium erosion = 86.5% "Because of these soil facts, throughout the construction and life of this project, there needs to be exceptional care taken to control for erosion runoff; where is the detailed, into the future, in the EAW? -Soil permeabilities are rapid for 37.7% of the project area and moderate for 62.3%. If secondary stage waste water is irrigated into Rapid Infiltration Basins, where is the data to show the construction of test wells in those areas to monitor the integrity of the water table against pollution from this irrigated waste water? Where is the data to show the staffing, and supervision of that staffing to monitor these</p>
145	50	General	GEN	<p>The Star Lake Limited Area Comprehensive Plan Is referenced as supporting information in many areas of this EAW and using Otter Tail County's own words in a response to the MN DNR, this is "NOT" an official plan, acts to severely undermine the integrity of the EAW. As you may recall, "Disingenuous" is the term used by the MN DNR in their letter to describe their impression of the Star Lake Limited Area Comprehensive Plan, a description we tend to agree with.</p>

146	50	Item 6 Page 4	GEN	The Star Lake Casino project, as outlined in the project description section of the EAW, is discussed as one single project, not two separate trust land and fee land projects. However, in subsequent parts of the submitted EAW, there are clear attempts to separate this into two projects, appearing to be a means of circumventing the required environmental review process noting a "lack of jurisdictional control" as the reason for doing so. Based on the very clear Minnesota rules, the cumulative effects of including any potential future phases. MUST be reviewed as part of this project's environmental effects. Subp. 9c. Connected actions. Two projects are "connected actions" if a responsible governmental unit determines they are related in any of the following ways: 1) one project would directly induce the other; 2) one project is a prerequisite for the other and the prerequisite project is not justified by itself; 3) or neither project is justified by itself.	
147	50	General	GEN	Otter Tail County, as the RGU for this project and now as the entity certifying the completeness of this EAW, must demand that these Minnesota rules and regulations are upheld and followed by the developer. To say the fee land and the trust land aspects of this project are not connected is very wrong and could only be done as a means of short-cutting the proper environmental review process. Something the Minnesota rules also clearly state is not allowable.	
153	51	General	GEN	Increase in light pollution - One of the greatest joys of spending time on the South Bay of Star Lake is the incredible night sky that one experiences on a clear night. A casino, with its three-story building and acres of lighted parking and roadways will ruin the rural night sky in this area forever. Future generations will not have the opportunity to view the sky and stars as we can now.	
158	52	Item 9 Page 10	GEN	The EAW is woefully inadequate at looking beyond the footprint or essence it's area of influence.	
159	52	Item 9 Page 11	GEN	This comment references the LSLCP in a way that lends it undue credibility and reference. By their own admission this document and process was 'not adopted as an official Comprehensive Plan by OTC nor was it accurate in many regards some of my peers will be or already have detailed. For instance, where are the hunters and fishermen or Biologists represented? The plan on addresses things on an assumption that this project will happen.	
162	53	Item 5 Page 1	GEN	Project Location. The EAW identifies five parcels, (one of which is misidentified), and omits a sixth parcel. That being 12.4 acres located on the north side of 380 th St immediately north of the acquired fee land. The proposer acquired this land for \$350,000 (which equates to \$28,225/acre), yet has not provided any plans or information for its use. Since this land would provide the only access to the main body of Star Lake it seems highly unlikely that it would not be included in any plans for a "Resort & Casino".	
169	57	General	GEN	Cumulative impacts at Star Lake. Concern with WE purchase of land along North arm of Star Lake and potential changes to the existing peaceful culture with water recreation at the lake. Concern of WE so far being very evasive about their long term plans for the complex. There has not been clarity from WE about their long terms plans for the complex and potential recreational involvement from the project at the lake.	
174	58	Item 17	GEN	What impact will the casino have on noise on the lake? On a quiet night, I can hear people talking in boats on the lake. I like to listen to the loons talk in the evenings.	
176	58	General	GEN	The EAW indicates further development will occur but does not disclose what that is. Do we not deserve to know what development is in the plans to determine further impacts it will have on Star Lake? Is marina proposed? Can our Public Accesses handle more boat traffic? Will we have adequate resources to patrol the water? What will the increased demand do to our fishery?	
176	58	General	GEN	Concern regarding taxpayer costs associated with the project. It is proposed the development will fill the wetland with 450,000+ cubic yards of fill. Concern regarding trucks hauling and traveling on local roads to construct the project. What impact will the truck traffic have on the roads?	
177	58	General	GEN	No one has even began to have the discussion of fire and police protection let alone health services. I can testify that the Dent First Responders do not have the manpower to take on this project.	
178	59	General	GEN	This EAW seems incomplete or inaccurate. The seemingly minor mistakes in this EAW might seem picky to bring up, but they point to a lack of attention to detail that I think is necessary in the review of all the facts that need to be considered before any permits should be granted.	
185	59	Item 2 pg 1	GEN	There is no Proposer or RGU listed, just the contact.	
186	59	Item 5, pg 1	GEN	The parcels of land listed (see document) are owned by Central.	
189	59	Pg 7, Section 8	GEN	I think the MCT would be the "Unit of Government" that would have to approve this application not the WEN. Does WEN have permission from MCT to use the land "Held in trust for the MCT"?	
191	59	General	GEN	As a casino patron I've noticed Minnesotan casinos aren't as busy as they once were. A feasibility study of the casino's success is needed in an EIS. It would be a shame for a development to be built that is totally out of character with the area and fail within a few years. EIS should include funding to be sure it doesn't stop have way through development. Concerned about the crime that usually follows casinos.	

193	61	General	GEN	I am a member of WEN and am totally against Star Lake Casino. Three of our council members made this decision without any input from tribal members. This project is hypocritical of our tribe's mission statement: To preserve, promote and enhance our quality of life
194	62	General	GEN	Served on the Star Lake Property Owners Association for two terms, believes they should be granted the permits to process with the development without additional studies. Has had multiple conversations with DNR officials, property owners, and USFW specialists, one theme that comes up is the development will not have a significant negative environmental impact of any magnitude on Star Lake. WEN is meeting or exceeding all laws, ordinances, regulations, and guidelines for a development of this size and are trying to create an environmentally friendly development. In the EAW they talk about their plans to prevent damage or restore wetlands, as well as to make it an attractive, fitting development. A survey was completed, a small group wants the casino and larger group does not want it. The largest group does not care one way or the other. A petition was sent for an EIS where his signature was included without his consent. Says they did this to make it look like a much larger group than it really is.
202	66	General	GEN	Otter Tail County is making a poor choice with this development
212	67	General	GEN	We must do everything we can to minimize the long-term damage
218	69	General	GEN	Submitted three photos of Star Lake, Dead Lake, and project site. Says the south arm of Star Lake is a poster child for which should be administered and protected as a natural environment body of water. County has a say on what happens to Fee and Trust Lands when what happens on them doesn't stay on them. There are reasonable project alternatives that have not been considered that will have less impact on the environment.
223	71	General	GEN	Keeping the land beautiful and the way it was given to us by the creator is very important. I do not believe that anything that happens with this casino is going to be good. What is this going to do to our communities and what is this going to do to the wetlands that are from the beauty of mother nature?
226	73	General	GEN	They are minimizing the impact the project will have on the environment by changing words the DNR said about the Red Neck Grebe.
227	74	General	GEN	TheEAW doesn't come close to covering what's necessary for that development (future expansion). You won't be able to stop the train if you have no control over what's happening now.
228	75	Pg 1, Pt.5 - Project Location	GEN	EAW identifies five parcels (one of which is misidentified) and omits a sixth parcel. That being the 12.4 acres located on the north side of 380 th St. The proposer has not provided plans for use though they paid \$28,225 an acre for the parcel. Seems unlikely they wouldn't build/expand on it after paying so much.
229	75	Pg 5, pp 6c - Project Magnitude	GEN	MN Rules 4410.4400 provide a lot of specifics, related to EIS thresholds, including subparagraph 1: An EIS must -- not shall, not can -- be prepared for projects that exceed the threshold of 250,000 square feet of gross floor space. However the EAW states the project is 277,000 square feet.
231	77	General	GEN	Consider the sustainability of the project, how have other casinos in rural MN been doing? Will the income from the casino payoff for the citizens?
232	77	General	GEN	13-14 million gallons of waste water will be held for a period of time before it can be put on the field.
234	78	General	GEN	The fact that this is the largest development in Otter Tail County and that it will be placed on very sensitive wetlands means that an EIS is very much an important thing to consider and do at this point.
235	78	General	GEN	The RGU is obligated to review the impact of the actions that affect land outside of the Trust and Fee Lands.
236	79	Item 19 - Cumulative Potential Effects	GEN	The document mainly states there are no predicted project environmental effects that will combine with any other known projects within the environmentally relevant area. That's what we call Cumulative Potential Effects. This assertion can only be true if you accept the state premise repeated several times in the EAW that state, county, and township governments have no jurisdiction over the Tribal Trust lots. This does not reflect controlling law. You have to consider the effects the project has on both sides of the land (public and Trust/Fee)
238	80	General	GEN	What happens to Star Lake is ultimately going to happen to Dead lake.
241	81	General	GEN	The sand wells in our area could have impact on the type of irrigation and infiltration planned for this structure. Deep well concerns being that the lake is 90 feet deep and that's what they'll pump from. I think the study they have done is inadequate for the potential of the drawdown from the Lake (example, White Bear Lake).
243	81	General	GEN	The storm water management system is design based on the 100-year flood event. The current trend in storms are frequent, heavy, and close to one another. I want to make sure this study has addressed the impact of the major storms sequencing within 24-48 hours of one another.
244	82	Section 9a and b	GEN	The EAW is missing a lot of information pertaining to fish spawning, wild rice, and nesting colonies. It is a top loon breeding lake in the country, the EAW doesn't mention the sensitive wetlands, nearby wildlife management are, or the two established hunting lodges. Doesn't indicate Star is a DNR deesignated wild rice lake that is still harvested and importantly feeds a host of migratory waterfowl. Wild rice will be destructed by human activity. Construction will likely disturb the breeding colonies of Red Neck Grebes. The EAW understates these concerns. Lights, noise, and human activities disrupt wildlife. A full EIS would help reassure us that every possible measure is being taken to protect these wetland areas.

245	83	General	GEN	The EAW answered the state requirement on future plans as "yes," they have future plans, but don't list them. This could lead to more destruction and impervious surface - which has detrimental impacts on waters in MN. The expansions will have a greater impact on wildlife, fish, wild rice, and other native vegetation. The EAW should be elevated to an EIS.
247	85	General	GEN	The destruction of the natural surroundings have made this an incredible waterfowl, migratory, and breeding grounds seems unthinkable. Why waste an area that has been so special for generations. Careful planning of future development should not be reactive to any proposed development, rather to be thoughtfully aligned with appropriate land use, compatibility, and measure by a variety of economic, social, and environmental standards. A study whose projections and conclusions are based on many assumptions has absolutely no merit as a document to support the developer's EAW (speaking about the Comprehensive Plan). In the absence of reasonable supporting documentation from original sources I respectfully urge the Commissioners to require the developer to complete an EIS.
249	86	General	GEN	Concerned about the 24/7 lights. Concerned about the wild rice. Concerned about sanitary sewage. Buffer strips block agricultural runoff, not the same as this type of runoff.
250	87	General	GEN	You don't build a casino on a wild rice bed. Push for the strongest EIS that you can get. What they're proposing to do is not being a good neighbor. Whatever money we already spent on other casinos, we will lose more for a small poor band that we are. AS a 25-year member of WEN I have not seen one dime of Shooting Star, so I don't need any more gaming on WEN or certainly on a wild rice patty. Gaming is on the decline, these RBC people are pushing this, so I guess please push for an EIS.
251	88	General	GEN	I've been a hog farmer all my life. If you consider yourself a good steward of the land I'd urge you to do whatever necessary to halt this project.
257	91	General	GEN	WEN member. Didn't know there was a voting to do the casino, I don't approve of it. I don't see it's benefitting us and feels it's out in nowhere. Appreciate everybody's concern about the wildlife and environment.
260	93	General	GEN	Greatly concerned about the impacts the proposed Star Lake Casino would have on the area around the proposed building site. Family bought the land close to the proposed site 20 years ago because of the clear lake, as it pertains to fishing, water clarity, and undisturbed natural areas along the lakeshore. The fill needed to advance the construction project will destroy eight acres of spawning beds and wild rice. Even though these are proposed to be replaced elsewhere, this does not actually restore/replace what is lost. If construction is allowed to proceed, large paved parking lots will be constructed near the lake causing polluted water in the form of runoff into the lake during rain events and snow melt. Waste management and disposal is the greatest concern. The proposed method of waste treatment is not an ideal situation. Sewage lagoons will not only affect water quality, but also air quality. A pungent odor will spread over most of the lake during the spring, summer, and fall months. The lagoons' proximity to a small, unnamed lake on the west side of 41 could cause that lake to be polluted in the event of heavy rainfall or it may leak, polluting the surrounding area. Do an EIS on this property.
261	94	General	GEN	How the environmental mitigation affects us directly as human beings. The 24-hour lights will affect duck fishing. This project will negatively influence the experience future generations have in the area. An EIS is necessary to look at this aspect of things and out in the future.
263	95	General	GEN	I don't see anywhere who is going to operate or maintain the systems/ponds.
265	97	General	GEN	Lived on Star Lake since 2005. Not in "accept or not accept" camps but vehemently opposed to moving forward without EIS. There is only one Star Lake. County can't move forward with process without a more detailed analysis. EIS would also examine alternative designs that would result in fewer environmental impacts. Purpose of environmental review is not to stop projects but collect information to avoid or mitigate effects. Environmental concerns: water quality, fishing, birds and wildlife, old wild rice beds, safety, AIS, noise and light pollution, threat to wetlands.
266	98	General	GEN	Opposition based on: size of project is inappropriate to scale of rural Star Lake, threats to water quality, threats to wildlife (loons), boat traffic, light pollution, noise pollution. Believes money and power generally prevail over interests in preserving pristine nature. Special places of our earth rarely recover once desecrated.
268	100	General	GEN	Speaker at public meeting (6/15): Fargo resident with family place in Star Lake Area (35 years). Varying background of jobs and believes public meeting speakers did great job providing a large degree of information for consideration. Hopes the comments will be considered seriously as he considers them all to be accurate.
270	102	General	GEN	Speaker at public meeting (6/15): John and wife built a house on Dead Lake. From Rochester, MN, which has no natural lakes. Is very appreciative of Dead Lake for its natural beauty and that of surrounding lakes. Tells County not to take a thousand lakes for granted. Cannot afford to waste these resources.
271	103	General	GEN	Lived in Dent for 40+ years. Own 130-acre parcel immediately to west of fee land where developer is planning to construct two sewage lagoons. Concerns include, air pollution (from sewage pits specifically), Light pollution (they will be able to see the lights from their living room), Noise pollution (commercial operation with peak traffic), rural character. Relating to all points above, the casino does not fit with the north rural feel they have lived there for. Request EIS to ensure the most environmental review is completed.

272	104	General	GEN	MN Historical Society: Conclude that there are no properties listed in the National or State Registers of Historic Places and no known or suspected archaeological properties in the area that would be affected by the project. If project is considered for federal financial assistance or requires a federal permit or license, the review will need to be initiated by the lead federal agency.
273	105	General	GEN	Permanent resident of County (not summer or hunting season only). Live on Lake Lida. In favor of the casino along with "many others spoken to". Work force issue: Fargo Labor Bus is closer to Star Lake than Mahanomen. Many people might retire early and move to the lake if there were full- or part-time jobs available. Many farmers and families would be available when it was not planting/harvesting season. Everyone thought the meeting was about environmental issues and not a "for" or "Against" meeting. With small towns and newspapers, many do not dare stand up and say they are for gambling and drinking (reference to "silent majority" who voted for Trump). Many would like places to meet friends and family and to eat. Pelican Supper Club has closed. Think how the casino affects everyone (economic development, taxes, relocation of people) and not just self issues ("my" lake, tribal checks, etc.)
275	106	General	GEN	Effects of stormwater runoff on Star Lake, birds, fish, and water quality (pollutants, filtration, temp changes to the lake, sediment runoff due to dredging, cutting trees, construction, parking lots, etc.). Runoff from impervious surfaces (what are they exactly?) and the golf course? We need to understand the total impact of the casino and future projects will be through studies.
277	107	General	GEN	Work in the WEN reservation for ten years and worried to see what impacts will happen in our area. Worried about the road he lives on being a short cut to the casino and if people will pollute his yard or damage it in some way. It will be a lower quality of life. Full support of an EIS.
279	109	General	GEN	Our primary responsibility is to the Star Lake Township residents. Must be good stewards to our natural resources by having an EIS.
281	111	General	GEN	Need to consider the distance between irrigation systems and Otter Tail River. There is human error, no matter what industry you're in, and this can cause problems with nutrients that should be removed from the water (i.e., metals). Runoff from the parking lots will cause issues as well if the irrigation systems don't do their jobs properly. Location, location, location is key to me. This is not a great site, not enough room, capacity, and buffer.
282	112	General	GEN	Guard what you already have accomplished with tourism. Don't throw away what you've already accomplished.
283	113	General	GEN	The EAW doesn't address the resort aspect, future plans that are not on the table. They are not forthcoming with the entire scope of the project. It is not a replacement for the family resort. The skyline will forever be changes by the proposed massive water tower. Nothing has been addressed about the gas station convenience store that accompanies virtually all casinos in the state. Once again, there's more coming with this project. EAW doesn't come forward with the impact to the lake with the shoreland they own. This must be reviewed at the highest level.
286	16A	Section 4 Reason for EAW Preparation	GEN	Other developments of similar scale, intensity, or use were either denied a Conditional Use Permit or required to complete a full EIS as an EAW was determined to be insufficient. Examples: Blue Heron Bay Project and a 30-unit RV park on the west arm of Star Lake. Noted similar impacts to water resources, fish and wildlife; increased traffic, air pollution; and impacts to the surrounding environment.
288	16a	Section 4 Reason for EAW Preparation	GEN	The total floor area of 277,000 square feet is larger than the mandatory EIS threshold for unincorporated land of 250,000 square feet. The EAW mistakenly relies on the Limited Area Star Lake Comprehensive Plan as evidence that the development has been thoroughly planned, reviewed by the community, and will be designed and developed in a way to avoid environmental impacts. This plan is too limited in scope to provide sufficient environmental protection.
294	16a	Section 11 Water Resources	GEN	EAW is deficient in the following specific [wastewater] areas: •Maintenance plan - says "at some point in the future" sludge will be removed, this is unacceptably vague and suggests the proposer has not considered the issues. Also needs specifics on the regulations with which the treatment system is to comply with. •The EAW should provide more information on whether aeration alone is sufficient to treat the waste - should include alternatives. •Claims no surface water discharges from the treatment system will occur are unsupported by any evidence. Should include procedures and contingency plans for if the system fails or overflows. •EAW fails to consider impacts from the wastewater treatment ponds to migratory birds and terrestrial animals. It should demonstrate that the treatment system was designed to avoid and reduce potential environmental impacts and contingency plans for a forcemain failure. •EAW should provide more information on how waste generation amounts were generated.

295	16a	Section 11 Water Resources	GEN	<p>Wastewater irrigation discussion lacks detail and precision. EAW should include:</p> <ul style="list-style-type: none"> - Evidence for the conclusion that no effects to groundwater from wastewater being used as irrigation water - The pollutant content of the wastewater used for irrigation - How the "automated system" will prevent the irrigatin behing sprayed into wetlands or adjacent properties. - Who is responsible for growing the wastewater-irrigated crops? Where and to whom will these crops be sold or distributed? - More information on the rate of irrigation - what does the 12-inch rate mean? <p>•Insufficient information to determine if PVC is the correct material for a forcemain that crosses CSAH 41. A failure of the forcemain would be disastrous.</p>	
296	16a	General	GEN	The EAW should discuss the construction process and impacts in more detail, especially disturbances to wildlife and plant communities, erosion and sedimentation BMPs, and construction traffic and noise. The proposer should specifically describe efforts to avoid and reduce environmental impacts, and endorse methods to mitigate the adverse impacts of the construction process.	
297	16a	General	GEN	The EAW fails to describe the quantity and quality of stormwater runoff or BMP locations. It does not discuss erosion and sedimentation impacts, BMPS for the vegetaion removal activities, or existing drainage patterns. Does not mention the MPCA Stormwater Manual, only quotes stormwater management which does not adequately consider or plan for erosion, sediment control, or stormwater management.	
298	16a	General	GEN	Discussion of impacts of stormwater runoff is very limited considering the project will include 10 times more impervious surface than pre-development. Details on how the proposer calculated impervious surface are inadequate. Does not explain what will be done with rooftop runoff. Pollutant treatment ability of the pond is not supported.	
299	16a	General	GEN	Modern low impact development or green infrastructure practices would produce significantly better environmental results than stormwater ponds. There's no discussion on alternatives. Also does not consider the potential impacts of stormwater ponding on groundwater.	
300	16a	General	GEN	Claims that erosion amounts will be reduced as a result of change in land use are unsubstantiated by any evidence. Active agriculture may continue on the irrigated parcel and any reductions in erosion would not atually occur, and erosion impacts of wastewater land application are not considered, even though it's in close proximity to Star Lake.	
301	16a	General	GEN	The SWPPP submitted for the CUP conflicts with the description provided in the EAW (says Rapid Infiltration Basins will be installed, not ponds), they should be consistent.	
303	16a	General	GEN	EAW assumes the casino and hotel will be completed on schedule. There's possibilities of construction delays and/or development could be canceled part way through. The EAW should discuss alternatives and mitigation plans if one of these instances happens.	
308	16a	General	GEN	Have studies/modeling been completed to identify if the development would significantly affect recharge, temperature, or water quality?	
309	16a	General	GEN	The project is located within 1,000 foot shoreland district. Does the current project location and set-back meet watershed and other regulatory set-back recommendations/regulations from shoreland? What constitutes "natural shoreline" and how is this being maintained given the proposed development plan fills 6.8 acres of wetlands which is contiguous with Star Lake? How will the project preserve the natural shoreline?	
310	16a	General	GEN	Is it prudent to place wastewater treatment ponds adjacent to Unnamed Lake? What will be doen to mitigate potential issues? What alternatives were considered and rejected, why?	
312	16a	General	GEN	How will impacts from road salt and deicing materials be mitigated?	
313	16a	General	GEN	What is the lowest elevation (basement) of the proposed infrastructure? What is the distance and elevation difference from the lowest construction elevation to the 1,329.5 ft designated OHWL and 100-yr flood level of Star Lake? Does the project meet watershed and other regulatory set-back recommendations/regulation from flood levels and OHWLs?	
322	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	GEN	The description of the project mitigation activities for potential impacts related to tree loss is inadequate. Proposer should also discuss how changes in water temperature affect fish reproduction.	
323	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	GEN	Proposer does not discuss where seed to restore native vegetation will be sourced. Native plantings should be based on current and historical vegetation use, seeds and plants appropriate for the soils, and hydrology of the restoration areas.	
329	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	GEN	Have the plant surveys for Creeping Juniper that were requested by the DNR been conducted?	

332	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	GEN	There is no discussion of MN DNR Native Plant Communities, Biological Survey, Regionally Significant Ecological Areas, Sensitive Shorelines, Conservation easements, or Lakes of Biological Significance in the EAW.
333	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	GEN	The EAW does not mention Star Lake's status as a lake of Outstanding Biological Significance. It also does not discuss how project design or mitigatio activities will address or protect this status.
334	16a	Section 15: Visual Impacts	GEN	Descriptions of visual impacts are vague and include insufficient information. The EAW does not discuss the impacts of the 85-foot tall hotel and casino, large support buildings, entry signs, and large parking lots will have on visual environments. Proposer needs to consider alternatives to avoid or minimize visual impacts and how they will mitigate the visual impacts of all buildings.
335	16a	Section 15: Visual Impacts	GEN	Proposer should describe how all signs, parking lots, and buildings will be lit, and how adverse the impacts of lighting will be minimized. Should include number, wattage, location, and type of lights; types, sizes, and locations of signs; and plans for how and when the building, signs, and facility grounds will be lit. The proposer should also describe how best management practices, including Dark Sky Lighting practices, will be implemented.
336	16a	Section 16: Air	GEN	EAW fails to adequately quantify or describe composition of [air] pollutants, and adequately discuss efforts to avoid, minimize, or mitigate these emissions. To which air quality standards will the project adhere? How will compliance occur? The assertin that the diesel generator wil cause "negligible emissions" is not supported by any evidence. What type of generator is it and what is its emissions profile? How often will it be tested and how will it be operated during emergencies?
338	16a	Section 17: Noise	GEN	EAW fails to achieve the minimum standards of [the Noise] section. Claims are conclusory at best and significant amounts of required information are missing.
339	16a	Section 17: Noise	GEN	EAW does not adequately describe the sources of noise and how the sources of noise were determined. Proposer should discuss what other noise sources exist (other than traffic). Considering the project will generate significant new traffic, the proposer should also discuss how much noise the increased traffic will create. There's no mention on efforts to avoid or minimize noise generation. Should also discuss measures to mitigate the effects of the noise. This is required.
340	16a	Section 17: Noise	GEN	Entirely fails to include any detailed information abot the characteristics, duration, quantities, or intensity of nise generated during operation. It is inadequate to state that "excessive noise" is not "expected" oce construction is complete. Quantifiable descriptions of all types of noise generated, expected or otherwise, should be included.
345	16a	Section 19: Cumulative Impacts	GEN	The EAW states that none of the potential environmental impacts will result in cumulative impacts and that there are no foreseeable futre projects that could cause environmental effects. These cliams are unsupported by any evidence and do not even appear to consider the incrememtal effects of the various environmental impacts potentially caused by this project. Even if many of the environmental impacts provided in the EAW are mitigated the cumulative impacts of the project(s) will drastically alter the existing human and natural environments.
346	16a	Section 19: Cumulative Impacts	GEN	Summary of the inadequacies and potential environmental impacts that support the Environmental Review Team's conclusion that OTC should require an EIS: Substantial, irreversible cumulative impacts; Adverse impacts to water resources, caused by the wastewater treatment and stormwater management project components; Short- and long-term impacts to fish, wild, and plant resources as a result of the construction process and facility operation; Adverse effects to the visual character of the site; Gross incompatibility of the proposed project and the existing character fo the site and surrounding areas; and Negative impacts to transportation systems and highway safety caused by the increased trip generation and year-round operation of the casino and hotel.
348	114	General	GEN	Recommends adding into the EAW the fact that Star Lake has been designated a lake of biological significance, ranked as "outstanding." Also have measures identified to protect the lake and water as well as the wildlife that live there.
349	114	General	GEN	Add how close the building will be to water and future development of the shoreline
350	114	Page 31	GEN	The sentence, "in addition, as the tribal trust parcel was landlocked, by purchasing adjacent properties, this allows great access to the rising vegetation for harvesting." This implies boat access to water from the property. When it is a casino, will there be a demand to launch boats to collect wild rice from the property? Where will the disturbance lead? This access will become more obvious and use will increase, potentially harming lakeshore vegetation. Later in the document it mentions that boating traffic may increase. Recommends further describing how much, where, if there will be a demand for a dock, and any plans to address these demands.
351	114	General	GEN	Information is lacking regarding ongoing management of the lands associated with the project. Recommends more detail on how landscaping and grass will be maintained, what type of vegetation would be allowed, how invasive species would be controlled, etc. Recommends including if any of the agricultural areas will be hayed.

352	114	General	GEN	Recommends the use of wildlife friendly erosion control be included in the project. Also recommends the development of a plan for management of invasive species on the property. Any vegetation management on site should have plans to control invasive species.
353	114	Pg 9, Question 9 a. ii.	GEN	Recommends describing how the Limited Star Lake Comprehensive Plan recommendations that are associated with this project will be implemented even though the County did not adopt it as a County Comprehensive Plan. Also recommends describing how the project is compatible with the OTC Local Water Management Plan and with the Star Lake Water Quality Assessment Program or LAP study completed in 2000.
354	114	Pg 9, Question 9a. iii.	GEN	Recommends describing the Unnamed Lake NE classification as was done for the General Development Lake classification. Recommends the following language: "Natural Environment Lakes are generally small, often shallow lakes with limited capacities for assimilating the impacts of development and recreational use." Also recommends defining what the setbacks are for sewage treatment facilities for both the NE classification and the General Development classification.
357	114	Pg 16, Question 11 a. i.	GEN	The EAW states that "According to the Minnesota Department of Natural Resources (DNR),...or any outstanding resource value water." DNR recommends correcting according to the below information: MN DNR's NHIS letter states: According to the DNR Habitat and Population Evaluation Team (HAPET) Breeding Pair Accessibility Maps, approximately 21-30 pairs of waterfowl birds per square mile are present in the project area. Also, Star Lake has been identified by DNR as a lake of high outstanding biological significance. These lakes have an exceptional fishery, are important wild rice lakes, have high plant richness and quality, and may contain endangered, threatened, special concern, or several species of lake birds in greatest conservation need. Star Lake has been identified as being highly sensitive to the introduction of phosphorus. The EAW states "Star Lake is identified as by DNR Wildlife as a Wild Rice Lake..." NDR recommends adding information about wild rice lakes and [their] significance.
358	114	Pg 16, Question 11 a. i.	GEN	DNR also recommends the document also clarify that Star Lake has been on MCPA's list of impaired lakes for mercury since 2008, and the lake has an EPA Category of 5, meaning that the lake requires a total maximum daily load (TMDL) plan by 2020. Recommends stating in the EAW how this project would meet a TMDL standard and reference that these are classified as public waters and under DNR jurisdiction.
359	114	Pg 17, Question 11a. ii.	GEN	Recommends describing the depth to groundwater and groundwater aquifer under the proposed wastewater treatment ponds and measures to ensure those aquifers will not be polluted by the wastewater treatment ponds.
361	114	Page 25	GEN	Discuss the potential for groundwater contamination from construction, there is a potential during construction for the project to reach groundwater. EAW discusses the water level but not contamination potential from oil spills and other construction contaminants.
363	114	Page 31, first paragraph under Fish, Wildlife...	GEN	Recommends clarifying DNR or respective committee's role in regulating wild rice harvesting
366	114	Page 34	GEN	Encouraged that native vegetation is being considered. Recommends using a mix developed by BWSR. This would increase both diversity and likely success of establishment. Also recommends using MNTaxa to determine which native species have been documented in OTC and select appropriate species to use.
367	114	Page 34	GEN	Recommends expanding BMP details in order for appropriate assessment of the impacts. EAW mentions "dark sky lighting" (pg 36) but doesn't provide a reference. DNR recommends adding a reference and explicitly stating what activities/actions are going to be taken, or at a minimum, provide a few examples of BMPs that are being considered because lighting can affect species and their interactions with the habitat. Recommends adding mitigation measures into project planning.
369	114	Page 36	GEN	Expand the visual section. EAW states the casino and hotel will be visible, but there is no further information to assess the impacts. Because the EAW does not provide details or drawings, the DNR is unable to determine the impacts on the birds from building glass or structure visual effects.
370	114	Page 38	GEN	Expand the information about generator noise associated with RV parks, such as decibels expected and possible time period. Generator noise can also impact wildlife, and DNR recommends discussing how this noise may disturb wildlife.
372	116	General	GEN	The EAW is deficient because it does not identify the proposer of the Project. It is a required element of an EAW and an essential element in determining the completeness and accuracy of the EWA. Liz Foster-Anderson is listed as a contact person. A contact person may be in addition to, not in lieu of, identification of a project's proposer. As of June 20, 2017 White Earth Enterprises LLC is not, and has never been, registered with the Minnesota Secretary of State as a domestic or foreign company. Without a definite proposer, the Board of Commissioners cannot conduct the due diligence necessary to grant permits, contract for joint services, assess legal liabilities, extract financial assurance, or enforce performance.

373	116	General	GEN	The EAW is deficient in identifying the need for and status of required permits. The EAW states that an application for a federal permit to discharge fill material into wetlands was submitted on May 2016. This does not reflect the current status of the federal permitting process. By a letter dated March 24, 2017, the USACE request that the applicant respond within 60 to substantive questions raised by the public comments submitted on the federal permit and demonstrate its ability to meet criteria in the CWA. The unanswered questions establish the potential for significant environmental effects that warrant and EIS.	
373	116	General	GEN	Authorization by the Minnesota Chippewa tribe for the Project on the trust parcel should be demonstrated in a complete social and economic review as part of an EIS.	
374	116	General	GEN	The project does not comply with standards set forth in the OTC Shoreland Management Ordinance. It does not comply with the SMO vertical setback requirement or impervious surface area limit. The "building" complies with the vertical setback requirement, but the requirement applies to a "structure," not just a building. The parking lot is subject to the requirement. If each separated parts of the parking lots is considered by itself, there are several lots that clearly do not meet the impervious surface coverage limits of the SMO. The failure to meet the impervious surface area limits is presumptively an environmentally significant effect that warrants further study in an EIS.	
375	116	General	GEN	The EAW is deficient in its review of historical and archeological resources. Failed to account for a previously identified archeologically significant site in the "area of impact" - right in the center of the proposed casino project. Blondo, who did the archeological survey, did not identify a previously recorded site - site 21-OT-95 - that is located directly in the area of impact for the casino project. (Referenced a 2016 Merject report that identified this site)	
376	116	General	GEN	Environmental review of the project should include necessary improvements to public safety services that are connected actions. The EAW does not take into account the limited availability of local resources to provide emergency services or the environmental impact of the projected annual 200 to 275 calls for and trips to the Project area for such services.	
378	116	Page 27	GEN	Anticipated increased use of the lake needs further study. The EAW states that no significant change in the number or type of watercraft is expected, yet the Limited Area Star Lake Comprehensive plan characterizes the project as lake-oriented, "The Star Lake development is intended to have more of a north woods lodge environment and an atmosphere that caters to families and lake enthusiasts."	
381	118	General	GEN	I have seen what Metro lakes have turned into. With restrictions on limits of fish a person may safely consume. Vast plumes of algae from street run-off. And, the proliferation of invasive species. Throughout central Minnesota, added human footprints on lakes like Mille Lacs and the chain lakes has again introduce over and over a proliferation of invasive species to our valued lakes and wetlands. The revenue generated by the casino to the county will be a short-lived boon before surrounding land will inevitable be depressed of value. Call for an EIS.	
382	119	General	GEN	There is a fifteen-acre lot on the project site that will be cut down. We know shoreline trees are vitally important to the health of the lake as they prevent erosion and keep run-off from going into the lake. Half of the land is agricultural, though the EAW characterizes the whole project area as agricultural.	
383	119	Section 15	GEN	The EAW states that "no known scenic views or vistas are located in proximity of the project and the surrounding area." I believe residents would strongly disagree. Both nearby roads MN-108 and CH-24 are designated as Scenic Byways.	
385	119	General	GEN	The EAW references only one connected action - the cumulative environmental impact of the whole project must be considered. Any anticipated action on the fee land parcel north of 380th street is a connected action. The EAW glosses over other anticipated future projects on the fee lands mentioned at the public meetings; a golf course, marina, and waterpark, which would have major environmental consequences.	
388	119	General	GEN	The EAW fails to mention that Star Lake is ranked by the DNR as a lake of Outstanding Biological Significance.	
391	119	General	GEN	Light pollution will ruin the brilliant night sky. In Otter Tail county we value our rural heritage, and especially the abundant wildlife and scenic beauty.	
394	120	General	GEN	I am opposed to the whole project. However, if it is going to happen, I would like to make sure it has as little impact on the environment as possible. It is really concerning when you are talking about filling in wetlands and developing on almost three hundred acres. This would destroy wildlife habitat and putting in such a large development is shocking. The water treatment facility is very concerning. Where could it possibly go? The water runoff alone from the parking lots and RVs is going to have a huge impact on the lake and wildlife around it.	
398	121	General	GEN	Resulting traffic increases on both roads and lake will have negative long term impacts on residents. Why purchase all the shoreline on the North side of their property if they do not have long range plans to put in a marina? Not considering those impacts as well ignores the possible impact to that shoreline and fish hatchery.	
399	122	General	GEN	As the elected leaders of OTC, I am sure you realize the decisions that you make concerning this project will affect many lives for years to come. While the project may generate revenue for OTC, I fear the damage done to Star Lake, the surrounding area, and the residents of not only the Star Lake area but all of OTC will outweigh any benefits.	
400	123	General	GEN	The circumstances surrounding the development can hardly be construed as benefitting the involved tribe or the local community. Nor is the development likely to present a positive image for tribal gaming moving ahead.	

401	123	General	GEN	Minnesota's tribal gaming market is already widely considered to be saturated, with more than 20 casinos in a state of 5.5 million people. The area is sparsely populated except during the summer month. The proposed site is literally in the middle of nowhere. The location raises the obvious questions of where the gamblers will come from and how they will get to the casino. There are other, better-located convention resorts in the county with more local cachet that are having difficulty staying afloat as it is. Is there even room in the market for a newer and flashier property that offers gambling?	
403	124	General	GEN	One significant shortcoming of the EAW is the project description which describes this as being one project. However later in the EAW it is discussed as two projects, one on trust land and one on fee land. Which is it, one project or two?	
405	125	Project Description, Letter E	GEN	The answer to the question of if there were future stages of the development was "yes" yet there is no further description of future stages. The State law requires all stages be considered one project to be reviewed at the same time, not reviewed once they've decided to build on them.	
407	125	General	GEN	They are well above the impervious surface allowance on the Trust Land. It is well documented that impervious surfaces have detrimental impacts on the waters in the State of MN.	
409	126	General	GEN	Concerns about water quality and fishing being impacted by construction. The fill needed to advance the construction project will destroy 8 acres of spawning beds and wild rice. These acres will cease to exist, putting wetlands somewhere else doesn't replace them. Runoff from the parking lots will impact water quality. This will further negatively impact the lake by introducing oil, antifreeze, gas, and other hazardous chemical to the lake in much larger quantities than are presently found there.	
410	126	General	GEN	Greatest concern is for waste management and disposal. The proposed method of waste treatment is not an ideal solution. Lagoons will affect water and air quality. The location means pungent and unwelcome odor will be spread over most of the lake during the spring, summer, and fall months, when the winds come from the southwest (where lagoons are proposed to go). A drain field would have much less impact on the air quality. The lagoons proximity to the unnamed lake could cause that lake to be polluted and would spread pollution to the surrounding area.	
417	128	General	GEN	Environmental concerns with water runoff/wastewater, light pollution, and critical habitat for migratory birds and fish are a few of the many reasons we have [for] such a large proposed development.	
178	58	Item 6	GEN	The immense size and building it on wetlands. What happens if the project proposer runs out of money and cannot finish the project or the gaming industry goes bottom up and they are forced to close the casino. Would the neighboring community be left with a large building, parking lot and wastewater treatment pond sit there as an eye sore?	
48	18	General	EIS	USACE closed the file on the Dredge and Fill Permit due to lack of response from White Earth Nation. The Pine Point alternative site would have better economic potential, yet this point was omitted from the applications submitted for the Star Lake Casino site. In the CWA, guidelines require that the applicant demonstrate there are no practical alternatives with less adverse impacts on the environment. A 12.4-acre lakeshore parcel was not included. This was to get around lakeshore ordinances (others have been denied doing the same thing), and USACE asked for responses to this and received none. An EIS must be done.	
56	20	General	EIS	This project needs an EIS. This response does not constitute approval by the MPCA.	
72	22	General	EIS	This project requires an EIS because it will have significant environmental effects on water quality from Star Lake to Otter Tail River and beyond. The EAW of record has numerous errors, omissions, and speculative unsubstantiated conclusions.	
73	22	Page 31	EIS	The fact that "minimal information available" is the very reason why a more in-depth analysis required by an EIS should be ordered.	
78	23	Pg. 5, paragraph 6c - Project Magnitude	EIS	Gross floor space is 277,000 square feet according to the EAW. MN Rule 4410.4400 says an EIS must be required on any area above 250,000	
80	24	General	EIS	The EAW is superficial in nature, it does not address detailed technical concerns, such as: Impact on site prep and ore samples needed for ground stabilization. Moderate risk of the ground settling and the building being condemned. Preventing erosion is critical. The ground will shift if too much pressure is exerted in winter and if ice gets thick, the impact on a breach here would be devastating. No technical information on the construction process let alone the total impact on the lake during construction and site prep. I have never seen such a weak and superficial report on the environment on the impact on a proposed major construction project. This is simply an attempt to overlook the details and take huge risks with a significant area lake and furthermore with the impact on Dead Lake too. Demand the more detailed environmental study.	
88	27	General	EIS	It is my hope that an EIS be conducted before the proposed casino project is approved. Environmental, social, and economic risks have been explored and the results demand further review of this project. To ignore the risks and grant project approval before conducting a thorough study would be nothing short of criminal, in my opinion.	

115	40	General	EIS	This project begs to be expanded to a full EIS to ensure all impacts on the community as a whole are taken under consideration.
116	40	General	EIS	A full EIS is needed on the potential impact of the entire plan (future builds) not just Phase I
128	45	General	EIS	You will hear tonight many convincing arguments why this project will potentially-most probably-result in significant adverse environmental effects. Many of which the Minnesota Environmental Rules mandate the RGU (OTC) to call for a full environmental impact statement.
129	45	General	EIS	In your role as RGU, you are required to look at the full cumulative effects of the total project. This is a HUGE project that proposes to operate 24-7-365 that will forever change the environment and the fabric of the rural countryside. An EIS provides the opportunity to thoroughly examine alternatives with the facts and science that minimize adverse environmental impacts.
130	45	General	EIS	Their project screams for an EIS, among other things, would explicitly call for and examination of alternative configurations and their environmental impacts. It would also allow the proposers to disclose their subsequent plans for the shoreline property on the big lake that they have not addressed.
141	49	Item 6 page 3	EIS	The commercial building area proposed is 277,000. Doesn't this already require an EIS? - WEN states they would use revenues for this casino "to fund the restoration and preservation of cultural sites within WEN such as the tribal museum and historic burial grounds." Has the WEN already used their revenues from existing casinos for these cultural sites?
142	49	Item 6 page 4	EIS	Are future stages planned?" Yes. Increases in gaming area, expansion of RV parking, addition of rented cabins and/or a golf course -Then, OTC needs to consider these future plans in their decision about calling for an EIS
148	50	General	EIS	...We won't reiterate all these issues here, however, the most significant, in our opinion, relates to this project's cumulative effects and connected actions. If there were ever a project that needed an EIS, this would be it. After all, this would be the largest commercial development of its kind in OTC and is being proposed directly on top of a centuries old, Star Lake wetland area. Those two factors alone are clearly enough to warrant an EIS to insure a complete environmental review is properly conducted.
149	50	General	EIS	This commercial development is currently being proposed on top of a very sensitive wetland area on Star Lake's south basin. As such, this proposed project must receive the most thorough environmental review possible, an Environmental Impact Statement (EIS), to insure Star lake and its watershed are protected.
150	50	General	EIS	An EIS is obviously the only way to fully insure the potential for significant environmental impact is thoroughly investigated and all the risks identified allowing proper mitigation activities to take place. An EIS would protect everyone involved, the Otter Tail County Officials, the Otter Tail County Taxpayers, the People of the White Earth Nation, and the most importantly, the entire Star Lake watershed for future generations to come. There is simply no sound reason to put all this at risk by not ordering an EIS.
151	50	General	EIS	In addition, the Star Lake Casino proposal. If built, would be the largest commercial development of its type ever completed in Otter Tail County. Per the EAW, this projects commercial development area is stated as being -277,000 sq. ft. Under Minnesota Rules 4410.4400 subp. 11.B, an EIS is mandatory for construction in an unincorporated area of a commercial facility that exceeds 250,000 square feet of gross floor space.
154	51	General	EIS	Environmental Impact Statement is necessary. Mr. Kalar and Otter Tail County Commissioners, the proposal to develop a casino on the shore of the South Bay of Star Lake will forever negatively impact the water quality of the lake, the rural character of the area, the amazing night sky and the safety of the surrounding County roads. For these reasons, it is vitally important that all potential impacts to the lake and surrounding landscape be studied through an Environmental Impact Statement - It is your duty to explore every impact of this, the largest proposed development in this area of Otter Tail County. Requiring an Environmental Impact Statement will help determine what impacts this development proposal will have on Star Lake and the rural area surrounding it.
163	53	Item 6c Page 5	EIS	MN Rules 4410.4400 provide a lot of specifics related to "EIS Thresholds", one of which is subp 1 "An EIS must be prepared for projects that exceed the threshold of 250,000 square feet..." - However, in the EAW the proposer states the square footage planned as 277,000 square feet. Well, above the stated EIS Threshold, and in of itself, should warrant an Environmental Impact Statement.

164	54	General	EIS	Range of Alternatives: Because of ALL the potential issues associated with this very large and complex project, an EIS would result. In analyzing the data associated with a "Range of Alternatives to the proposed action. Alternatives are considered the "heart" of the EIS. Every EIS is required to analyze a No Action Alternative, in addition to the range of alternatives presented for study. The No Action Alternative identifies the expected environmental impacts in the future if existing conditions were left as is with no action taken." There are so many angles and considerations to this project; we owe it to all impacted people (residents, visitors, tribal members, taxpayers) and the environment to fully analyze all possible and reasonable alternatives.	
167	55	General	EIS	Star Lake Township (SLT) recognizes that the proposed casino project is complex and controversial, with many stakeholders involved...to that end, it is our belief that our primary responsibility is to Star Lake Township residents (i.e. voters), the people & families that live and thrive here on a year-round basis, those that call Star Lake Township "home". Secondarily, we must also do what we can to protect the rights of "all" of our property owners/tax payers - those new and old. It is with these thoughts in mind, that the SLT Board of Supervisors respectfully requests that you insure that this matter receive the most stringent level of environmental review, as well as a review of the socio-economic and public safety concerns involved. It is our understanding that to do so, requires completion of an Environmental Impact Statement (EIS). We believe to do anything less would be a disservice to our citizens, property owners, and our stewardship of the natural resources of Star Lake Township. We thank you for your careful consideration.	
192	60	General	EIS	I do not see how this project can be allowed to continue without an EIS.	
198	64	General	EIS	A full study must be done. An evaluation will consider light, noise, and traffic on the surrounding community.	
199	65	General	EIS	The SLT Board respectfully requests that you ensure this matter receives the most stringent level of environmental, socio-economic, and public safety concern review through the completion of an EIS.	
200	66	General	EIS	Otter Tail County should conduct an EIS	
203	66	General	EIS	We request a full EIS be completed before any business venture begins in this area.	
204	67	General	EIS	If ever an EIS is required, this is it!	
221	70	General	EIS	The casino will forever negatively impact the water quality of the lake, rural character of the area, amazing night sky, and safety of the surrounding. It is very important that all potential impacts of the lake and surrounding landscape are studied through an EIS.	
237	79	General	EIS	You must order an EIS.	
239	80	General	EIS	An EIS is what I would refer to as cheap insurance. This needs to be an EIS.	
246	84	General	EIS	General aspects that can be evaluated by an EIS: Social and economic impacts - Impacts on residents and visitors as well as the WEN. Submission of a financial plan. Propose evidence that there's sufficient funding to see the project to completion Range of alternatives	
297	11	general	EIS	Homeowner who petitions that the County Board requires an Environmental Impact Statement (EIS) to protect wildlife, bird species, and the water.	
298	12	Page 3, Project Description b.	EIS	The Scope alone should require a full EIS. Many parts of the Plan are incomplete. No analysis of traffic impact of required workforce, need for additional housing for both temporary construction workforce and the permanent casino staff. How will the construction crews handle waste and water accommodations (more mobile home parks created to fit this need)? A full EIS would cover this.	
299	12	Page 27	EIS	Neither the EAW or Limited Area Plan has done a complete analysis of the increased use of Star Lake waters (in reference to increased boat traffic). It's reasonable to believe there will be an increase in jet ski, pontoon, and boat traffic, which may introduce invasive species and puts pressure on lake fishing and water resources. A full EIS is needed to analyze this issue.	
300	12	Page 39	EIS	There is no reference in the EAW to the additional workforce traffic nor any data on the increase in area roads for issues like DUI drivers. The project includes a 216-seat bar with 979 parking spots and RV traffic. What does that mean for increased impaired drivers on area roads? In addition, the data on crime increase related to casinos, security cost, and emergency medical services are NOT well identified in the plans thus far - these should be part of an EIS requirement.	
301	12	General	EIS	Overall I do not feel the EAW as submitted has sufficient detail to justify approval of the project. A full and complete EIS should be a minimum requirement for a project with this magnitude of environmental impact.	
302	13	General	EIS	Overall: Please do the right thing and require an Environmental Impact Study	
303	15	General	EIS	Where would workers come from to support the Star Lake Casino as the White Earth Reservation is some 60 miles from the proposed Star Lake Casino? We would all be remiss if we did not agree that there is a need for an EIS.	
304	16a	General	EIS	Hired EOR to complete an evaluation of the EAW, result: "It is the expert opinion of EOR, as well as SLCCG, that Otter Tail County should require the developer to conduct an Environmental Impact Statement (EIS) to avoid irreparable impacts to the natural and human environments in and around the project site." Tyler submitted the full evaluation for the Commissioners to review.	

305	16b	General	EIS	USACE has "Closed" the file on the Dredge and Fill Permit application filed by the developer last fall. SLCCG does not fully understand the full legal implications of this, but do feel it warrants your attention. It also feels like a slight to the many good citizens who took the time and effort to provide an approximate 130+ comment letters during the comment period. More specifically, the SLCCG respectfully submits that without the require "Dredge and Fill Permit," Otter Tail County should issue a positive declaration for an Environmental Impact Statement to provide the full due diligence that this matter deserves.
371	115	General	EIS	Asking for a complete thorough EIS to be considered. If an already established dwelling on a lake needs to go through so much red tape (permits) for the well being of that lake, then a casino should most definitely need much more assessment than that. It is destroying nature, please seriously consider a full environmental study for this project.
380	117	General	EIS	The Minnesota rules state that an EIS shall be ordered for projects that "have the potential for significant environmental effects." It is extremely clear to me that the proposed Casino development has the definite potential for significant environmental effects. I have read the report from USACE regarding the wetland alteration permit; I have read the DNR comments regarding the EAW; and I have read teh recent detailed technical report on teh EAW prepared by EOR. I urge you tot take the step of calling for an EIS on this proposed project.
393	119	General	EIS	There may be solutions that would mitigate these factors, but analysis of those alternativews will not happen without an eIS. Elevating this process to an EIS would reassure us that every possible measure is being taken to protect these valuable natural assets, our wildlife, and our sensitive wetland areas.
402	124	General	EIS	Based on the fact that the proposed Star Lake Casino is the largest commercial development of its kind in OTC and has great potential for significant environmental impacts, this project should require an EIS.
404	124	General	EIS	The only way to truly protect the OTC Board of Commissioners, the OTC taxpayers, the People of WEN, and most importantly, the entire Star Lake watershed, would be to order an EIS.
408	125	General	EIS	The cummulative effects these expansion have will only exacerbate the negative environmental impacts to Star Lake and therefore this EAW shall be elevated to an EIS. The County Commissioners alone cannot properly evaluate the total impact. By elevating this to an EIS, the proposer should develop their plans to include all possible phases and be evaluated as ONE project.
414	127	General	EIS	We at least need a full EIS for us to understand what we will be forfeiting when we choose gambling over the natural environment of Star Lake.
415	128	General	EIS	We truly believe that when the EIS is conducted, there will be proof the influence of a huge cinso-resort complex will destroy the immediate and surrounding areas of land and lakeshore habitats. A completed EIS identifying the entire environmental, infrastructure, social, medical, emergency service, security, transportation, and tax implications of such a major development is what we feel is needed. We ask you approve a ful EIS for the future of Star Lake.
168	56	General	EIS	[Owns properties on west arm of Star Lake] Urges an EIS, as the EAW understates concerns of the project. The size of the project and potential impacts of the environment as currently proposed and cumulative effects of futures development; increased traffic; treatment of wastewater not fully considered; light pollution (partially addressed); and signage, which can be intrusive, has not been address; are some of these concerns. An EIS would mitigate some of the negative effects with better planning and/or alternatives.
170	57	General	EIS	"I think a project of this scope, and with this potential for environmental problems, absolutely warrants an EIS and I hope that will be put in the decision."
179	58	General	EIS	[Resident of Star Lake for past 36 years] Request for EIS for the proposed development on Star Lake. (see specific EAW comments)
258	92	General	EIS	A social impact statement must be done along with an EIS.
274	106	General	EIS	We need a mandatory EIS to address our concerns.
6	3	pg 10	LU	Comparison to Black Bear Casino is not an equal comparison
7	3	pg 26	LU	It would be realistic to anticipate significant increased boats on the lake from fishing opener through Memorial Day as well as other popular Holiday weekends throughout the summer.
8	12	Page 8, 9. Land Use	LU	In response to 9.a.i., this is truly a wetland and wildlife habitat area due to animals living there year round. In response to 9.b., a large, lighted casino with a parking lot and RV park does not fit a reasonable definition of "rural." There is existing research on the impact of casino development on property values, local economies, and communities but no references to them in the LASLCP or EAW.
9	12	Page 11, Ordinance Requirements	LU	What legal right grants the Tribe and/or the County the right to combine Trust and Fee land to avoid problems with impervious surface requirements on Fee land? This right should be listed in the EAW and/or made known to the public. The Tribe is in violation of the existing shore land area impervious surface rules on its Trust Land with their proposed development plan.
10	12	Page 36, Visual	LU	Having an 85-foot-tall main structure with 180 rooms, bar, event center, fully lighted, does NOT result in minimal visual impact to the lake or surrounding area. The holding ponds will radically disrupt the rural nature of the area.
11	13	9b	LU	We like the "rural" character of Star Lake, that is why we chose to purchase a year-round lake home there. It is quiet an peaceful and we enjoy fishing and water recreation on the lake and do not feel that a casino fits in with the surrounding lands.
46	17	General	LU	This is a rural area and should be left as one without the neon and flood lights, increased traffic, garbage, and noise pollution.

59	21	General	LU	This site is about as environmentally unsuited as a site could be for a casino. I support the need for an EIS.
84	26	Land Use Compatibility	LU	The current characteristic of the land is rural and the current proposed development is not compatible
85	26	Zoning Compatibility	LU	The development does not meet structure height, minimum impervious surface, open space requirements on the Trusted Land. All other landowners and developments are required by law to meet these expectations. This leads to frustration on landowners' side as they should not be able to combine Free and Trust lands to look like they meet requirements.
86	26	Visual	LU	The casino, hotel complex, and parking lot will forever change the landscape on Star Lake and surrounding area. This will affect humans and wildlife.
103	35	General	LU	This development represents yet another threat to the future recreational use. The land was meant to harvest wild rice, this may not be a good business and is not compatible land use decision from an environmental stand point. The rules/laws that require a certain ownership are driving the site of this development. Find another site so the sensitive nature of the proposed site is not compromised. With over 40 years as a DNR Area Fisheries Supervisor, I have evaluated hundreds of shoreline development projects and few are more troubling to me than this site.
143	49	Item 9 Page 6	LU	Land use compatibility: "Generally compatible with the nearby land uses of agriculture, residential, commercial lodges and resorts." - This is a blatant falsehood and inaccurate comparison of existing land use! NO other resorts have 24/7 gaming facilities with the resulting traffic, nor conference centers for 300 people, nor hotels for hundreds of people. Franks Lodge may compare for RV parking. In addition, no other resort has required (from p. 2) "construction of haul roads, borrow pits for fill, 3-pond waste water treatment facilities!"
155	51	General	LU	Negative impacts to the rural character - The area around the South Bay of Star Lake is identified in the County's Limited Area Star Lake Comprehensive Plan as rural and it is noted that this characterization is important to the property owners and residents in the area. As a property owner, I am telling you that the rural character of the area, including farming activities, is extremely important to me. The shoreline of the South Bay of Star Lake is not compatible with large-scale developments, residential, commercial or for a casino. This type of development would negatively impact the rural character of the area and the lakeshore.
160	52	Item 9 Page 12	LU	Please recognize this project in this reference and MANY others I don't have time to address in 2 minutes is entirely rely incompatible with existing land uses and people/wildlife who use it traditionally and currently. I can live with change, but we owe it to the wildlife, the water quality, and future generations to do our part to ensure that proper site selection and sound developmental practices take priority to shoehorning and abomination on such a delicate shoreline. I wouldn't care if it were a Radisson or Hilton Project of this size, this IS NOT THE PROPER PLACE FOR THIS...
171	57	General	LU	EAW states this project is compatible with rural area. Does not think it is compatible with the area and neither does any of the public representatives that have showed up at meetings to comment. Feels this is one area where local resident opinion should be quite important as they are the ones familiar with the area and who have to coexist with the Casino.
180	58	Item 9	LU	This development is not compatible to the rural character of Star Lake. Star Lake is a quiet, peaceful, tranquil lake. The boat traffic of those on the lake for skiing, wake boarding, and jet skiing is minimal. Most of the people on the water are fisherman and if you fish you know the two are not computable. Several people fish the south arm for crappies and sun fish. This development will destroy the area where they spawn and the recreational boat traffic is sure to increase. No doubt rural character and the charm of the lake will be lost.
187	59	Item 5, pg 1	LU	Whoever the Proposer is should have to get all the zoning of the land correct to make sure this land even qualifies to be commercially developed.
190	59	Pg 10, Section B	LU	We chose to live here instead of areas like Brainerd because it is non-urban/serene/not developed. While development might bring additional visitors to the area, it could drive away others that are looking for serenity.
195	63	General	LU	We must keep our rural and lakes country separate from city and economic development
209	67	General	LU	Noise, traffic, light pollution cannot be underestimated.
213	68	General	LU	The location and indoor activities of the casino conflict with the primary land use. Heavy weeded nature of the lake make it very poor for the water sports that are supposedly an attraction for the casino.
217	68	General	LU	Casino shouldn't be built here just because of wealthier property owners. Could easily fail because it's so far from cities/primary customers
220	70	General	LU	As a property owner in this area the rural character of the area is extremely important to me. The shoreland is not compatible with the large-scale developments, residential, commercial, or for a casino.
225	73	Page 10, section 9b.	LU	I see the claim that the casino is compatible with the surrounding land as false and inaccurate. Game and nongame waterfowl flock to Star Lake because of its secluded, rural character. The wetlands are in good condition, which attract more waterfowl and so more hunters.

230	76	General	LU	The wild rice bed caps have historical meaning in which in our tradition wild rice is the most important meal that we have. First meal we feed our young and last meal we feed our old. The land and water body have historical value and there needs to be more study done to preserve any artifacts that could be buried in the ground. Other options should be pursued.
269	101	General	LU	Speaker at public meeting (6/15): Seasonal home owner, he and wife Mary live in Maryland. Mentioned attempt to put casino near Gettysburg battle field. Position is that land is sacred ground. It's a bad idea, not just an EIS but no casino.
287	16A	Section 4 Reason for EAW Preparation	LU	Future development plans are not in place, even though WEN has purchased a parcel of land adjacent to the main body of Star Lake. The RGU should explore the intended use of this parcel to ensure future development is considered in the environmental cumulative impacts of the EAW.
289	16a	Section 9 Land Use	LU	The EAW wrongfully compares the casino to the neighboring resorts and camps. The size of the casino is not compatible with the single-family cabins on Spruce Lodge's property.
290	16a	Section 9 Land Use	LU	The casino will operate year-round, whereas the other resorts/camps/lodges are seasonal. A year-round operation will generate considerable use of the local lakes in all seasons. The EAW has no evidence or information regarding impacts caused by this new, intense use of Star Lake. It also fails to describe or identify efforts to avoid, reduce, or mitigate such impacts.
291	16a	Section 9 Land Use	LU	The EAW claims, without evidence or explanation, that the large, commercial facility is compatible with the "rural character" of the parcel and surrounding area. The proposer should more accurately consider and describe the compatibility of a large hotel and gaming facility with a rural character, as well as provide detailed plans for mitigating the impact of a large, uncharacteristic commercial use on the area's rural character. The EAW fails to present any evidence supporting the claim that the resort is "compatible" with the surrounding land use. The parcels are zoned as Residential and Managed Forest. A commercial building is not compatible with these uses.
292	16a	Section 9 Land Use	LU	The EAW should more clearly describe how the project will achieve compatibility with the existing zoning requirements. The table outlining the zoning and land use regulations should specify each applicable standard or how the project meets the standards.
293	16a	Section 9 Land Use	LU	Future land use designations should be provided in text or exhibits in the EAW.
355	114	Pg 10, Question 9b.	LU	The conclusion that the project is compatible with the surrounding area is not well supported in the EAW. The proposed structure within the shoreland district will be 85 feet high whereas the surrounding developments have a maximum structure height of 20 for commercial use and 25 feet for residential. DNR recommends further explaining how and why it is compatible given that the most prominent commercial use in the area is identified as a seasonal corner store.
356	114	Pg 11, Question 9c.	LU	Per Pg 10, Question 9c. comment, recommends describing how the potential incompatibility would be mitigated. The mechanism is not identified.
384	119	Sections 9A and 9B	LU	The people who live here or own cabins came to get away from the business of the cities. We came to experience the absence of the noise and bustle that development brings. These are facts that contribute to the issue of compatibility. The EAW is inadequate in part because it doesn't consider the connected actions or cumulative effects related to the casino proposal.
386	119	Section 9B	LU	The developer completely fails to demonstrate the assertion that the project is compatible with the existing land uses. The examples given in this section that cite regional resorts of more or less similar scale are not comparable either. Maddens is on a sand bottomed lake, not a sensitive wetland, and it is in an area that is already fully developed. Homestead RV Park is much much smaller. No examples demand an extraordinary wetland fill of 450,000 tons.
389	119	General	LU	The application doesn't mention that there is existing land use of the south bay by recreational hunters and fishermen.
392	119	Sections 9A and 9B	LU	The issues of compatibility in these sections is a key issue in both ecological terms and aesthetic terms.
412	127	General	LU	The light pollution from traffic and buildings and advertising will diminish the night time experience of solitude for residents and visitors for miles around and forever change the character of the Star Lake experience for children of the future. It will become just another urban lake.
416	128	General	LU	We chose Star Lake for our home because we were lucky enough to spend our summers on Star. It's the serenity of a peaceful, quiet lake that drew us to become full-time residents. We believe this type of development does not mesh with the rural character of the Star Lake Area.
4	2	general	WQ	I am deeply concerned that not only the fish population may be in jeopardy but if the waters become contaminated the home values on Star Lake will decline significantly in value.
5	3	pg 26	WQ	I would suggest that the casino project threatens the water quality through increased boat traffic, boat discharge, and the potential for invasive species.
6	5	Section IV Surface Water	WQ	"plans would include maintaining and sustaining the undisturbed wetlands and vegetation". The word "PLANS" concern me as we have all seen many "PLANS" go by the wayside after approval. Also, even with no docks adjacent to the casino, I believe that area would see increased boat and pontoon traffic with boaters wanting to see the casino from the water with resulting additional damage to the wetlands and vegetation in that section of the south arm of Star lake.
47	17	General	WQ	The environmental impact of potential future expansions are not addressed in the EAW. The unknown plans of this expansion will increase the pollution and health hazards to the environment. Once the water quality of a lake is compromised and a wetland is destroyed they are impossible to restore.

57	20	Item 11	WQ	EAW is missing information on abandoned wells, the drilling log, well construction log, registration information regarding the production well installed at the project site, and the planned location of the second production well. Sediment discharge will affect several surface waters, so a 50-foot natural buffer is necessary or equal alternative. The SWPPP will need to show the locations where temporary erosion prevention covers will be applied along with the timeline for completing them. Proposer should consider methods of volume reduction along with proposed stormwater basins, like stormwater harvest and reuse, green roofs, pervious pavement, and/or bioretention or part of the water quality volume. 401 Certification requires the proposer to provide additional details on proposed/expected BMPs to ensure construction won't increase TSS/sediment entering nearby surface waters.
58	20	Item 16	WQ	Calcium chloride has the potential to contaminate groundwater and surface waters. A non-chloride alternative has been used successfully and may work better.
74	22	Page 20	WQ	Anticipating incorrectly can lead to potentially catastrophic results. The EAW doesn't seem to consider the near-by residences who draw water from shallow sand point wells. The plans to meet the "100-year, 24-hour rain event of 6.13 inches" seems dreadfully inadequate based on the changing severe weather patterns and recent year summer storm experiences. Parking lot spring snow pile melt off (with all its pollutants) are not acknowledged or given special care.
104	35	Page 10, section 9b.	WQ	The shoreline/water quality will be severely impacted.
105	35	Page 10, section 9b.	WQ	The new wastewater treatment and ponds could fail, harming water quality and wild rice surrounding the area.
117	40	Pages 21-22	WQ	High-density storms are occurring on a more frequent/intense basis resulting in greater impact on the storm infrastructure than anticipated. What will be done if the system fails? What effects will it have on the lake? Who will be monitoring the system? The stormwater management plan does not take into consideration the irrigation field schedule of waste water discharge. The field parallel to 380th St. has overflowed 380th during heavy rain events. How would the irrigated field affect the lake (i.e., fertilizer, pesticides) What measures are being taken and what control will the county have relative to impervious discharge on sovereign land?
131	45	General	WQ	I accept the EAW was developed in good faith, but by definition it is only an overview of potential environmental effects! The consequences of being wrong on this one are permanent and forever. The proximity of the project is to this unique and incredible sensitive watershed is a problem, not so much the project itself.
133	47	Stormwater Runoff	WQ	I have grave concerns about cumulative watershed impacts, stemming from parking lot runoff and storm water management in general, not to mention impacts of construction and facility operations on fish and wildlife resources. The proposed area is adjacent to wild rice beds and fish breeding areas. Further, from an aesthetic viewpoint, the proposed facilities will negatively impact the visual character of the site.
136	48	General	WQ	If we want to do expansion of my property on Star Lake there are requirements so we do not disturb the environment and lake. This needs to apply to other entities as well.
156	51	General	WQ	Negative impacts to wetlands, wild rice and water quality - ...today the South Bay of Star Lake contains one of the largest wild rice beds in the State of Minnesota. The proposed casino would seriously jeopardize the water quality, which would impact the wild rice and that would have a negative effect on waterfowl and other migratory birds who depend on the South Bay of Star Lake. Specifically, the developers propose to dredge and fill 8.41 acres of wetlands within Star Lake.
181	58	Item 16	WQ	Concern regarding odors from the wastewater treatment ponds. Perham was having problems with odors from their wastewater treatment ponds. I avoided the city because of the strong stench. What are we going to be dealing with having large wastewater ponds located across from the lake. We frequently get west winds. Are we going to be smelling this every time the wind blows from the west?
196	64	General	WQ	How could a property that was being discussed gain approval to move forward near to such a delicate lake area
207	67	General	WQ	What system will ensure that Star Lak will not be subject to a cumulative effect of pollution to the water?
215	68	General	WQ	There will be an increased runoff from tar based surfaces
219	70	General	WQ	The Star Casino would seriously jeopardize the water quality which would impact the wild rice and have negative impacts on waterfowl and migratory birds.
240	81	General	WQ	Every time there's a big storm, runoff comes off the field (where the waste water system is proposed to be), over the road, and into the lake. That's what's got to be proposed as a high potential for impacting the quality and pollution of our lake.
248	86	General	WQ	Runoff from roads, curbs, gutters, etc. has caused a lot of water quality issues on lakes in the TC and it costs a lot to clean and maintain them. Really concerned with the amount of impervious surface on the casino area, parking lot, driveway, and building, roof top, everything that runs off that go into the water. In 2010 MPCA had an article about when phosphorous and sediment goes into a shallow lake, blue green algae grow and expand. It's poisonous, and this is something that could happen.
262	95	General	WQ	Salt is really bad right now in our lakes and rivers and stream. I want to make sure no excess of salt is going into the lake.

264	96	General	WQ	Family-owned Star Lake Property for 100+ years. Bird and meteor shower enthusiast. Main concern is for impacts to fine water quality of Star Lake. Runoff will certainly come from development project and additional housing for those to work at casino. Parts of the lake are shallow, sensitive areas containing necessary vegetation for the lake. Question the likelihood that native people want to replace ricing area with casino--is it only the interest of a few who will gain from it? Rural casinos struggle long-term to attract people. Much to consider before saying "go ahead" with project.
284	113	General	WQ	Driving down 41 will be like driving by a sewage treatment facility not a wonderful little natural unnamed lake west of 41.
311	16a	General	WQ	How will boat parking be prohibited along the shoreline adjacent to the development? This could cause significant damage to the shoreline and emergent lake fringe. What downstream hydrological impacts will the development cause to Ditch 23? The EAW does not consider this issue.
13	5	Section IV Surface Water	WL	Questions 2:1 replacement ration in another county
14	6	general	WL	should not be allowed to fill wetlands and opposed to the project being built in wetlands
15	8	General	WL	Removing wetland and building on the land will negatively affect the ecosystems of Star Lake and the alternate placement sites of the wetland. An increase in human population will result in an increase of invasive species (i.e., zebra mussels) and will create lasting impacts on the lake and its inhabitants. Removing wetland from the floodplain means homes and roadways will be at risk of flooding. This land was placed in tribal trust for food/ricing and should be placed into a historical society to educate future generations.
16	9	General	WL	The land was originally meant to be a wild rice area and should remain that way. Removing the wetlands will disrupt the lake and its inhabitants, as well as loons and bald eagles. Increased road usage leading to an increase in taxes for road repairs and safety measures on the curving, hilly roads. Ambulances, EMTs, and fire trucks will be hindered by the increase in traffic. There are many loons relying on Star Lake (included an article about loons in MN), as well as countless other bird species, fish, and animals. A casino will disrupt the nature experience of those attending Camp Joy. Recommends placing the wetlands in the Minnesota and National Historical Society to retain it for future Native American generations.
17	12	Page 26, Wetland Replacement/Compensatory Mitigation	WL	What benefit is there for local property owners, tax payers, and those who enjoy wetlands and wildlife in Ottertail County to have the wetlands destroyed and replaced in Becker and Roseau counties?
75	22	Page 26, Wetland Replacement	WL	Replacing the wetlands in Roseau and Becker Counties does <u>nothing</u> positive for Star Lake, Otter Tail County, or downstream waterways.
94	31	Section 15	WL	"Relatively minor changes in elevation and dense tree cover in the surrounding area will result in relatively minimal impacts to the view shed." 34 acres of woods/forests before. 16.9 Acres after 422,000 yards of fill for parking/roads in 1000' Shoreland zone alone. This does not sound like relatively minor changes to us, especially considering EOT SWCD's assessment that the entire Star Lake Watershed has 178 acres of wetlands.
137	48	General	WL	Wet rice lands need to be protected as well. If this natural Reservation heritage disappears, it is gone for ever.
144	49	Item Page 5	WL	OTC controls wetland mitigation/replacement, wetland permits, utility permits for wastewater treatment facilities -Here are areas where OTC can call for more detailed data through an EIS. Further, replacing wetlands in other counties or out of State, does nothing to replace the value provided by that wetland right there in the South arm of Star that they plan to remove by filling it!
152	50	General	WL	The simple fact that this proposal requires over 8 acres of a prime Star Lake wetland extension to be dredged and backfilled with more suitable soils, clearly attests to the potential for significant environmental effects. There are clear Minnesota rules empowering you to insure these risks are properly identified and adequately mitigated prior to issuing the necessary permits. The proper course of action with this highly controversial project would be to order an Environmental Impact Statement to insure all environmental issues are properly identified, reviewed and the potential risks are adequately mitigated.
182	58	Item 11	WL	Why should the White Earth Nation be allowed to fill 8.41 acres of our wetlands and substitute this for 15 acres of wetland replacement in Becker and Roseau Counties? Tell me how this is of any benefit to the people on Star Lake and the residents of Otter Tail County. I think an EIS is needed to determine the impact that the loss of these wetlands will have on Star Lake over the next 100 years. This project will have a forever impact on Star Lake. ... Are there no other alternatives to filling in this wetland?
188	59	Pg 6, Section e	WL	There could be more wetland destruction with the potential expansion.

224	72	General	WL	Page 12 says there will be no impact to the wetlands, then later the EAW says that no impacts to the wetlands will happen within 75 feet of the shoreline, so they were excusing anything beyond 75 feet that will still be impacted. I would like to know the data that proves that wetlands only have an impact if they're greater -- less than 75 feet from the shore. 75 feet isn't enough to protect the land, fish, habitats, etc., around the wetland.	
242	81	General	WL	We have to recapture wetlands in our watershed district. This project is going outstate, upper part using lands that are owned by the Tribe to mitigate wetlands. It's reasonable that if we want to retain water quality here, so we need to maintain the wetlands locally.	
256	90	General	WL	It's all going to be built on wetlands and cause runoff.	
302	16a	Page 61, Preliminary Erosion Control Plan	WL	Skimmer pumps and outlets are directed toward a wetland and will undoubtedly impact the wetland ecosystems. Alternatives should be considered, potential impacts should be identified, and methods to avoid, reduce, or mitigate impacts should be described.	
304	16a	General	WL	Applicant should demonstrate there are no options for wetlands replacement within the minor watershed, then major watershed, before locating wetland credits outside the major watershed. Does the proposed wetland fill acreage within the Trust Land constitute a significant percentage of the overall wetland acreage adjacent to the Star Lake perimeter? What is the percentage?	
305	16a	General	WL	Proposer should explain efforts to reconfigure parking and access roads to minimize wetland impacts and the use of BMPs able to support current wetland hydrology.	
306	16a	General	WL	How will the project be graded such that runoff currently flowing to Wetland Basin 5 on the east end of the project will be managed by a stormwater pond west of the casino and parking? Flow lines would help understand how proposed BMPs would function.	
307	16a	General	WL	There should be a robust discussion on wetland sequencing. Should include alternative locations and a no-build alternative.	
320	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WL	The EAW fails to discuss the wetlands classifications, community types, and quality of wetlands being filled and their habitat value. Also fails to discuss how the habitat will be replaced within the site or as close to the impact as possible.	
321	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WL	The description of Wetland Basin 5 is inadequate. It is unclear whether it has a high relative abundance of native vegetation or whether it supports a diversity of invertebrates and wildlife.	
360	114	Pg 19 and 20	WL	Recommends explaining how much wastewater would be put onto the agricultural lands in gallons per day, and any impacts that may be associated with the wastewater or stormwater to nearby wetlands, including those on both sides of the road and runoff effects from the wastewater application to fields to any wetlands adjacent to those fields.	
362	114	Page 26	WL	Discuss how the project would avoid and/or minimize development and impacts on wetlands as a 75' setback does not seem adequate to protect wetland and rising vegetation from construction impacts, operational impacts, and runoff from impervious surfaces. Also recommends describing the type of wetlands that will be disturbed and if the replacement of wetlands will be of the same type.	
406	125	General	WL	These expansions could lead to more destruction to wetlands that are vital to Star Lake. There is already 7.4 acres of wetlands being destroyed and being replaced in another county in the current proposal.	
9	3	pg 3	WF	Chlorinated pools can have a great impact on amphibian populations. Will there be systems to reduce the number of amphibians killed by these pools?	
10	3	pg 31	WF	There are a few other rough fish missing from the EAW list but it seems purposeful to omit the most delicate species in the lake especially since there has been ample press coverage about declining tullibee numbers in the face of warming lakes. Any additional warming/pollution caused by the casino operation or its activities could be detrimental to the Tullibee population and needs to be addressed. Omission warrants an EIS.	
14	5	Waterfowl	WF	Prairie Pothole Region produces many of the ducks raised in the upper Midwest. Our part of this flyway will be changed forever by this project. The increased traffic, noise, lights, and disturbance of wetlands, rice beds, and vegetation will have a negative effect forever on this flyway and the nesting and feeding of its waterfowl.	
79	23	Pg. 31 Para. 13a - Fish, Wildlife, Plant Communities	WF	The EAW does not include Tullibees (Cisco) for which Star Lake is known to have a large and healthy population. Even more suspect due to published concerns and discussions on the general decline of the Cisco population and lakes that support the species. The Common Loon is another species that would be at risk due to negative environmental impacts The proposer's assertion that the unnamed lake west of Hwy 41 has minimal information and therefore is unimportant to discuss. The DNR classified it as an "Environmental Sensitive Lake" and it drains directly into Star Lake. The placement of the waste water system uphill and within OTC Shoreline Management Ordinance jurisdiction is a potential environmental travesty.	

87	26	Fish, Wildlife, Plant Communities	WF	The size and placement of this proposal will have an impact on wildlife, fish, and plant communities. How will the animals living in this habitat be protected from disturbances?
95	31	Pages 32-34	WF	What environmental impact will this project have on the nesting sites of birds? How does the casino plan to protect the natural shoreline from the affects of casino/resort goers?
106	35	Page 10, section 9b.	WF	This area is a prime habitat for waterfowl species as well as hunting - further study and representation is needed. Some waterfowl are sensitive to light, sounds, and proximity of humans/infrastructure. The Red Necked Grebe would likely be disturbed (EAW changed it to potentially)
161	52	Item 9 Page 13	WF	As far as non-game waterfowl of importance goes: o DNR identified the Red Necked Grebe as species documented to frequent the bay and recommended to the Proposer (& OTC) that they would warrant more study toward the project's effects on them, o Not only is not done, but the DNR called out the proposer recently in email correspondence for taking it upon themselves to modify the DNR opinion offered that this proposal would 'Likely cause the RL Grebe disturbance' to 'possibly'. If this was only noticed since the DNR drew attention to it, I ask you where else have future impacts been minimized or misrepresented in the developers favor? It every there was a project in OTG that warranted an EIS, this is it...
197	64	General	WF	The impact to wildlife, dear, birds, fish must be obvious [...] expecting to see a decrease on wildlife activity is a HUGE concern.
201	66	General	WF	The marsh and wetland area's of Star lake are too valuable to the wildlife inhabitants
205	67	General	WF	Migratory flow may be significantly impacted by the activity and light pollution
206	67	General	WF	The impact of filling in the area on fish habitat and spawning has not been determined
214	68	General	WF	The assault of light pollution would scare off the majority of the waterfowl
233	77	General	WF	The impact on the fish, tuabies, and sunnies.
314	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	The MN DNR requested additional study and/or data to identify the potential impacts to fish spawning and rearing areas near the project. The EAW does not discuss this additional data or study. EAW states several times that no substantial fish habitats are known within the Project boundaries. However the DNR NHIS letter indicates the south arm of Star Lake is an important spawning and rearing area. Proposer should specify wheterh the wetland area within the Trust Land is part of the habitat described by the DNR. EAW states invasive species have not been identified in Star Lake. However a precding sentence states there are carp present. Carp are invasive species.
315	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	The DNR map indicates that 21-30 pairs of breeding waterfowl are found per square mile in the project area. The proposer must address the possibility that these pairs utilize the wetlands that will be filled. The EAW fails to consider how the noise, traffic, lights, and other sources of pollution and disturbance will affect water fowl and other migratory birds in terms of migratory behavior and hunting seasons. It must discuss how this will be mitigated.
316	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	EAW does not discuss how resident populations of plants an danimals with limited or no ability to migrate to other habitats will be affected by construction and the new commercial facility.
317	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	Loons often use the same nesting sites and prefer secluded bays and hidden lake shore, will nexting boxes be installed? How will the project mitigate for lost nesting habitat?
318	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	Construction activities for the electrical projects are planned during the spring. The EAW does not discuss why these activities cannot be completed in the winter. This would limit impacts to wetlands, birds, and bats.
319	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	Documentation of the discussions with the DNR Non-Game Specialist should be included in the EAW.
324	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	The EAW should describe mitigation activities for preventing the introduction of terrestrial invasive species during construction.

325	16a	Section 13, Section D	WF	The EAW must discuss how the project will align with the objectives of preserving wildlife and habitat, specifically with the preservation of vegetation and integrity of the shoreline and shallow water zones.	
326	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	A review of state-listed species within the county would provide a more robust discussion of additional rare wildlife and plant species for which project development could affect. The proposer should conduct a robust, field survey of the project site and surrounding area to determine the status of state-listed species. Proposer should also provide a mpa of USGS land cover and historical vegetation.	
327	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	The EAW states there are no known occurrences of Northern Long Eared Bat (NLEB) roost trees or hibernacula within one mile. Is this based on most recent mapping? How does proposed tree removal meet the guidelines set by the US Fish and Wildlife Service Final NLEB rule? The Information of Planning and Conservation (IPaC) Trust Resources Report suggests 20 migratory bird species of conservation concern, Gray Wolf, and NLEB may occur within the project area. If these species are located nearby it is likely some will utilize or be found within the project area. The EAW must discuss how the project will mitigate impacts to these species.	
328	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	Creeping Juniper can grow on talus slopes, cliffs, exposed bedrock ridges - are any of these habitats available within the site?	
330	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	The EAW fails to discuss under what circumstances the disturbance of red-necked grebes will take place and the timing of when the proposer will avoid disturbance during breeding season.	
331	16a	Section 13: Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources	WF	OTC is located in the historic range of the Rusty Patched Bumble Bee. Will native plantings be used to provide habitat for pollinators?	
347	114	General	WF	The lack of construction and architectural details makes the EAW challenging to assess. For example, additional details on what kind of curbing would be used, how many windows and which way the buildings face, and if storm drains would be open would be helpful in assessing impacts to birds, amphibians, and reptiles. Turtles and amphibians have a difficult time navigating some styles of curbing, open sorm drains are fatal for turtles, and bird strikes on windows are a concern.	
364	114	Pg 31, under Fish, Wildlife...	WF	EAW state inasive speciese have not been identified on Star Lake. Purple Loosestrife was documented in an area along the east shoreline and adjacent land across the road from the lake back in the early 1990s. There was some control effort done, however it should be determined whether this still exists. DNR has Star Lake as a managed Purple Loosestrife site in the Area Invasive Species Plan.	
365	114	Page 32	WF	Recommends strengthening the language as birds (such as red-necked grebe among others) will likely be disturbed during construction unless the project is not constructed during the time they are present.	
368	114	Page 34	WF	Recommends explicitly stating what bird species would be impacted during construction and ways to minimize harm to their nests.	
390	119	General	WF	That Star is a DNR designated wild rice lake that is still harvested and, more importantly, feeds a host of migratory waterfowl is a reason for careful further study. Paul Radomski from the dNR told me in an email that while a wild rice inventory has recently been done, more study would be needed to link the significance of rice beds to the migratory birds that use this part of the lake. According to the DNR, Star is one of the top loon breeding lakes in the County. Looking at the loon inventory, if I am reading correctly, we'd be number two. What happens to the south bay affects the whole lake, and will affect loons and other wildlife. There is osprey on the lake. Trumpeter swans that were at Unnamed Lake last year have not returned - suspects the construction/electrical work putting in that infrastructure may have disturbed the. The EAW deliberately understates the DNR's concerns that construction would disturb breeding colonies of the red-necked grebes. Even though the parking lots will have downward facing lights, the signage will still affect wildlife.	
396	121	General	WF	Primary concern is the irreversible change to the natural habitat and the fish and wildlife that inhabit it today. This will be caused by the building process, the huge amounts of landfill to be brought in, stormwater runoff, and the presence of large numbers of people in a sensitive area.	

411	127	General	WF	Concerned about the noise, lighting, traffic, and pollution effects on Star Lake. Currently, Star Lake functions like a habitat refuge for wildlife and fish where human impact is minimal. However, the area of lake on which the Casino is to be built is shallow. It is very productive for breeding of fish and wildlife, but it is sensitive due to its shallow waters. Any light, noise, water, and boat traffic or construction activity will have an unusually strong impact on the lake temperature and suitability for wildlife. Heat and salt from the parking lots will eventually enter Stark Lake, I don't think the EAW adequately addresses the cumulative and long-term effects of this change in water flow.
33	12	Page 41, Other Potential Environmental Impacts	SE	The EAW lacks analysis for the environmental impact of temporary construction housing or workforce housing.
118	40	General	SE	Dent Fire Dept. capacity/training, equipment, and station size concerns. EMT response time, training/capacity concerns. Hospital capacity concerns for Perham, Pelican Rapids, and Fergus Falls Police Enforcement: traffic impact/enforcement, civil disobedience/crime potential/drugs & alcohol Work force/local opportunities Source of employees impact on surrounding communities and school districts Housing Stock
138	48	General	SE	Additional issues I am concerned about are abusive situations that can occur: abuse of chemicals, alcohol usage, along with prostitution on the land and on the water. These serious concerns would be extra expenses incurred by local residents and/or residents of Otter tail County.
139	48	General	SE	...will need to pay for include: upgrading the roads, increased road maintenance, increased police control both at the local and county level, a jail for temporary confinement, DNR policing of the lake(s), increased EMT and ambulance service just to name a few. There will be additional costs and issues to consider as time evolves.
165	54	General	SE	Social and Economic Impacts (to be addressed in EIS): I believe it is necessary to further analyze the short- and long-term social and economic impacts (out several generations) that may result from this proposed development on residents and visitors of Otter Tail County, as well as the people of White Earth Nation. Some aspects that are deserving of additional analysis are: available workforce, housing, economic impact to businesses, property values, aesthetics, noise, law enforcement, emergency services, and fire protection, just to name a few. While some of these have a cursory reference in the EAW, more analysis is needed (the information gathered for the LASLCP is inadequate). Possibly a "Social Impact Assessment" should be performed.
166	54	General	SE	Submission of a Financial Plan: BEFORE this project even considers federal or state permits I believe it is critical that the proposer provide evidence that they have sufficient funding to see this project as outlined to completion. There have been mitigation strategies outlined for various environmental issues, but what about mitigation strategies due to funding inadequacies? What if, like the Bagley casino, it goes over budget? What would be the environmental impacts of starting this project and abandoning it before completion?
172	57	General	SE	This project is a gambling operation and that entails some unique social effects that should be considered. "If this casino is like other casinos (and I see no reason to think it will not be) it will make a good percentage of its profits off of gambling addicts, which it will create and cater to. Along with the problems thief will cause for families, it will mean increased costs for treatment, counseling, legal proceedings, etc. Someone will have to pay for these costs and you can bet it won't be the casino."
210	67	General	SE	Who will staff the needed positions for such a large project?
211	67	General	SE	Who polices the area? Who will address gambling addiction problems?
216	68	General	SE	Casino owners are the only ones to financially benefit, not locals.
222	71	General	SE	Bill Marsh and WEN lied saying 50% of the workers will be from my people. We are 62 miles from my reservation to Star Lake and I don't see 50% of our people driving 124 miles a day for less than \$10 an hour.
253	89	General	SE	What about our fire department, first responders (in relation to how many people they project will be coming). Who is going to pay for that?
255	90	General	SE	You have a problem with the workforce. Here are the people going to come from to run this place? The Bagley casino had to cut back hours because of this. They also halted half way through because they ran out of funds. Where is the money going to come from for this project? This is all going to cost a lot of money for the taxpayers.
259	92	General	SE	Honestly we don't see very many deputy sheriffs patrolling 108. 108 is already a very busy road, without the additional traffic coming through, and nobody is following the speed rules anyway. More time needs to be put into this to plan what the effect are and if we're going to have deputies available to patrol the roads with that much more traffic coming through.
276	106	General	SE	Request further study of social effects of gambling and casinos in a rural area. Includes crime rates, drug use, land values, additional government services costs, gambling rehab, and health needs. As a taxpayer I am concerned about the long-term costs of the casino and how much taxes will come in for schools and other needs.

285	113	General	SE	Considering the driving distance from the reservation, I would expect that the allocation of 250 employees would be difficult to achieve. There are already Help Wanted signs around here, showing work force for that level of employment is very tight. New jobs for the community are great but upsetting the balance between employers and employees will have a major impact to the region, your neighbors, and fellow businessmen.
387	119	General	SE	The intended purpose of the Star Lake Limited Comprehensive Plan is to ensure that the public need is being incorporated into the planning process for this area. Without the implementation portion of the plan, it falls short of that purpose. At the first public input meeting, we were not allowed to make statements about our concerns, but limited to asking questions. This format meant that very little public input was gathered, as only four or five people were able to ask questions, and the developer team took up most of each questioner's time. At the second one we could put red dots next to concerns predetermined by the developer. None of the data collected from the public is included in the EAW. The developer did have this information as is noted in a preliminary study area review that was written by SRF for the Limited Star Lake Comprehensive Plan and EAW process.
401	123	General	SE	Where will the employees come from? The surrounding area has a shortage of blue-collar workers, with many local businesses currently running under capacity for that reason. The site is also a 90-minute drive south of the WEN Reservation. That's a long drive or bus trip for tribal members looking to make the commute each day. Finally there is the question of if this project is a good use of the tribe's limited financial resources.
15	5	Traffic	TR	Concern about increased traffic, noise, litter and ability for roads to handle increased load
119	40	Page 39	TR	The EAW minimizes what is potentially a significant impact on the local county and state highways servicing this project. The study overlooks potential safety throughout the local road network. Visitors who are unfamiliar with the road and were recently at the bar may cause traffic accidents. Visibility and safety concerns for specific areas: MN Hwy 108 and CR 41 Intersection E-W traffic on MN Hwy 108 Northside of Star Lake Hwy 108 South to Galaxy Resort CR 41 & West Arm Bridge 380th St & CR 41 Intersection CR 41 & CR 35 General comments on CR 41's size and ditches
157	51	General	TR	Crowded, dangerous, narrow County roads - The idea of developing a casino on County Road 41 on the South Bay of Star Lake is deplorable. The Otter Tail County Road Map, the proposed casino location is notable because it cannot be much farther away from any community in the County. The impact to traffic on the County's roads, specifically County Road 41 and 35 will be large. There will be significant increases in traffic, in accidents potentially with fatalities, and there will be a greater need to make improvements to these roads to accommodate the increase in traffic. The County roads around Star Lake are circuitous because there are so many lakes and wetlands that roads cannot be constructed in a linear fashion. Improving and widening these roads will be very costly, and County taxpayers will be responsible for paying for these improvements.
173	57	General	TR	[Family owns land on Star Lake for nearly 90 years] Attended the June 15th meeting at Pelican Rapids; this written comment is not intended to reiterate the very effectively presented environmental concerns documented there. Public safety on local roadways, most specifically, for example from Pelican Rapids to Dent on Hwy 108: winding roads, hills, many entrances, some hidden. Public safety concern with additional traffic and potentiality for drivers traveling these local roads under the influence. Concern regarding local roadway capacity given the nature of the roads. Concern regarding 108 and also turning onto 41 from 108 (on the corner). Concern with additional traffic on Otter Tail Lake Road and Hwy 35. Even greater concern during winter conditions, as 35 and 41 are often slippery. Concern is nature of traffic and additional volume.
174	58	Item 18	TR	Public safety concern with additional traffic on local roads. Biggest fear is deadly accident occurring at the corner of 41 and 108. This was pointed out to the engineering firm assisting in the development of the Star Lake Limited Comprehensive Plan. The intersection lies in a bowl and visibility is limited in both directions. Concern for larger vehicles like buses. Someone needs to study this in more detail. Concern also with traffic heading south on 41; properties on S 41 cross 41 to access the lake; concern with children and others crossing.
208	67	General	TR	Roads in the area of the proposed casino are already in need of attention.
252	89	General	TR	I have not gotten a good answer about infrastructure - specifically with roads. Specifically on the intersection of 108 and 41.
254	90	General	TR	Live five houses down from the corner of 108 and 41, every Friday night traffic through there is pretty crazy, people do not follow the speed limit. Someone from Detroit Lakes said they were going to do a study on that corner, but I haven't heard anything since. That's a red flag. The roads are curvy and in the winter they'll be icy.

267	99	General	TR	Speaker at public meeting (6/15): Cabin is right on the road, access to lake is across the street. Concerned about children needing to cross the street to get to the lake and the increase of traffic on the road caused by casino.	
278	108	General	TR	The EAW doesn't speak to impaired drivers coming from the bars.	
280	110	General	TR	108/41 is a hill where people drive too fast through. People are always fishing on the bridge over Star Lake, the increased traffic will be a safety issue. There are always pedestrians on 41 and 108, which will be another safety issue when traffic increases due to the casino.	
337	16a	Section 16: Air	TR	The conclusion that impacts from vehicle emissions will be minimal is not supported by any evidence. It is impossible to draw conclusions when no modeling/calculations have been performed or reviewed. The EAW does not appear to consider the vehicle emission impacts of the routine operation of the hotel and casino (i.e., food delivery, hotel necessities, etc.). Proposer should discuss how these operations were considered in estimates and calculations of vehicle emissions. EAW does not explain how traffic related improvements will help mitigate vehicle emissions or how the improvements were included in estimates or calculations of vehicle emissions.	
341	16a	Section 18: Transportation	TR	EAW is deficient in explaining that the increase in vehicle traffic and peak traffic flows could be injurious to the public health, safety, and welfare. The estimated traffic increase is inaccurate in a number of respects. The "comparable sites" are not actually comparable (they are from California, no comparable sites are from Minnesota). Gaming Floor Area is not an accurate metric for projecting traffic generation. Estimates do not seem to include the differences in traffic during weekends and holidays. EAW states that the peak hour traffic and total daily trips fall just short of the thresholds that would trigger a traffic impact study. The proposer should disclose the exact details and methods of the calculations.	
342	16a	Section 18: Transportation	TR	EAW does not present a thorough discussion on traffic congestion, only presents conclusory information regarding the capacity of the roads. No evidence, calculations, or other verifiable information is presented. Also fails to discuss efforts to avoid or minimize or mitigate impacts to transportation systems.	
343	16a	Section 18: Transportation	TR	No consideration of potential increase in boat traffic. How will the development mitigate these impacts?	
344	16a	Section 18: Transportation	TR	Does not consider the potential increase in snowmobile and ATV traffic during winter months and potential for guests to access (with or without permission) Star Lake through the proposed project. How will the development mitigate these impacts?	
377	116	General	TR	The EAW does not take into account a number of roadway improvement projects identified by the Limited Area Star Lake Comprehensive Plan and their potentially significant environmental effects. Lists traffic increases from 2011-2020 as a comparison between building the casino and not building the casino (ex. traffic increase without the Casino 7.8%, with the Casino, 64.1%)	
379	116	General	TR	The DNR noted that the projected traffic attributable to the project needed more study. In particular, the DNR faulted the plan's trip generation methodology, noting that the "comparable" projects from which the Project's traffic projections were derived were not comparable because they were mainly from California, Oregon, and Washington (only one comparable project was from the Midwest). Even if the peak traffic estimates in the plan are valid, the EAW does not consider the impact of the estimated 200-plus vehicles an hour turning in or out of the Project's entrances to Hwy 41.	
395	120	General	TR	If you have ever driven on the roads leading to Star Lake, you can clearly see that it is scary driving those roads at night. There is no room for expansion. There are parts of the road that is subject to flooding. So clearly there is no space to expand into a four lane. But if it cannot be expanded, then how will the roads hold up to 500-600 people traveling on a weekly basis?	
397	121	General	TR	Concerned about traffic congestion and resulting danger to anyone using the existing road system, which is full of blind spots, curves, animals after dark, and cabins close to many of the roads.	
413	127	General	TR	Traffic will increase and likely include many people who have no knowledge or interest in the natural resource of Star Lake. This will change the character of the community and move wildlife habitat to low priority, while earning money off the traffic with adjacent services will become the top priority. This will tip the balance into a cascade of development which will end with loss of a fine natural resource.	
1	1	pg3, par2	TL	Clarification of transmission vs distribution line. . . . "replacement of existing overhead distribution line with underground distribution line."	
2	1	Figure 5, sheet 1 of 3	TL	The map shows the anticipated corridor centerline extending north on Highway 1 to Highway 108. The actual centerline ends at the Star Lake Substation property located in the NE1/4, SE1/4, Section 16.	
3	1	Figure 6	TL	The substation disturbance map shows the substation location correctly. However, the approximate corridor centerline should not extend any farther north than this point.	