



To the Kandiyohi County Commissioners,

Currently, the property in question for the proposed development of the Tepetonka Golf Course is zoned as A-2 General Agriculture.<sup>1</sup> According to Kandiyohi County Ordinances a golf course qualifies as a Conditional Use for that zone and must request the approval of a Conditional Use Permit from the Kandiyohi County Commissioners.<sup>2</sup>

Before the Kandiyohi County Commission considers a Conditional Use Permit for the Tepetonka Golf Course Project, Kandiyohi County must complete an Environmental Assessment Worksheet (EAW) as outlined by Minnesota Rules 4410.1000 and 4410.4300, subpart 36. Completing the mandatory EAW will allow the people of Kandiyohi County to know the potential impacts on their community and local environment that will result from this development. Further, an EAW will ascertain whether the project has the potential for significant environmental effects and a more detailed Environmental Impact Statement (EIS) must be completed.<sup>3</sup> The project may impact a sufficient quantity of sensitive and/or non-sensitive shoreland as outlined in Minnesota Rules 4410.4400, subpart 27 to require a mandatory EIS.<sup>4</sup>

Shakopee Creek is a tributary of the Chippewa River which is, in turn, a tributary of the Minnesota River, one of the most polluted rivers in the United States. According to the Minnesota Pollution Control Agency, increasing water flow, erosion, excessive nitrogen, and phosphate, as well as high bacteria levels are major concerns in the Minnesota River Valley.<sup>5</sup>

Golf courses are widely known environmental risks. A survey conducted by the New York Attorney General's office showed that golf courses use between 4 and 7 times the amount of pesticides as agricultural land. The study also noted elevated levels of cancer, respiratory, and neurological diseases in golf course superintendents. "Anyone on the golf course or nearby is at risk," noted the report.<sup>6</sup> The Minnesota Department of Agriculture (MDA) has also found

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<sup>1</sup> Kandiyohi County, *Lake Andrew Township Zoning Districts*, <https://cms3.revize.com/revize/kandiyohimn/docs/Maps/LakeAndrewTwp2020-04-15.pdf>

<sup>2</sup> Kandiyohi County, Minn, Zoning Ordinance No. 9A (2018), [https://cms3.revize.com/revize/kandiyohimn/docs/Admin/Ordinances/9A\\_ZoningOrdinance4-24-18.pdf](https://cms3.revize.com/revize/kandiyohimn/docs/Admin/Ordinances/9A_ZoningOrdinance4-24-18.pdf)

<sup>3</sup> Minn. R. 4410.200, subp. 3.

<sup>4</sup> Minn. R. 4410.4400, subp. 27.

<sup>5</sup> Minnesota Pollution Control Agency, *Our Minnesota River* (Oct. 2017), <https://www.pca.state.mn.us/sites/default/files/wq-swm1-03.pdf>.

<sup>6</sup> New York State Attorney General, *Toxic Fairways: Risking Groundwater Contamination From Pesticides on Long Island Golf Courses* (Dec. 1995), <https://www.beyondpesticides.org/assets/media/documents/documents/toxic-fairways-1995.pdf>

evidence of pollution resulting from golf courses, noting elevated levels of mercury in the soil of golf courses.<sup>7</sup>

Adding a pollution heavy project such as a golf course to the Minnesota River Watershed would continue to put pressure on an already at risk watershed and ecosystem and reverse the progress on water quality that has been made by millions of dollars of Federal, State, County, Watershed District, and private investment along with countless hours of labor. In particular, the MPCA has noted that phosphorus and nitrogen pollution are critical risks to the Minnesota River and heavy use of pesticides and fertilizers will contribute specifically to these pollution levels. While research does show that golf courses can reduce pollution through the implementation of Best Management Practices, this would require further investment from government units stretching already limited pollution mitigation budgets.<sup>8</sup> Further, the risk of mercury pollution resulting from golf courses as evidenced by the MDA is also of concern to Minnesota's fish population, Minnesota anglers, and Kandiyohi County's existing tourism industry.

Golf courses also consume significant amounts of water, which could potentially impact surrounding Kandiyohi County residents' wells and ground water quality. Without further information on potential water use of the proposed project we cannot be certain of the impacts on local ground water quality nor downstream impacts in the Minnesota River.

The residents of Kandiyohi County expect a full environmental review and public comment period before the Kandiyohi County Commission considers a Conditional Use Permit.

Be advised that this message and petition has been cc'ed to the Minnesota Environmental Quality Board.

Sincerely,

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<sup>7</sup> Minnesota Department of Agriculture, *Golf Course Contamination from Pesticide Use* (June 2018), [https://www.mda.state.mn.us/sites/default/files/inline-files/golfcoursecontamination\\_1.pdf](https://www.mda.state.mn.us/sites/default/files/inline-files/golfcoursecontamination_1.pdf)

<sup>8</sup> Michael Bekken, *Water Quality of Golf Courses: What Does the Data Say?*, THE GRASS ROOTS, July/Aug. 2018, <https://turf.webhosting.cals.wisc.edu/wp-content/uploads/sites/211/2018/11/Water-quality-of-golf-courses-what-does-the-data-say.pdf>

