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Minnesota Department of Natural Resources

1201 E Hwy 2
Grand Rapids, MN 55744
218-327-4232

April 22, 2008

Ryan Leister, Planner
14084 Baxter Dr. Suite 7
Baxter MN 56425

RE: North Central Speedway Campsite Environmental Assessment Worksheet (EAW)

Dear Mr. Leister:

The Department of Natural Resources (DNR) has reviewed the Environmental Assessment Worksheet (EAW) for the proposed 150 unit primitive campground on 33 acres near Brainerd, Minnesota. We offer the following comments for your consideration in identifying potential adverse impacts to natural resources, determining accuracy and completeness of information, and identifying potential impacts to resources that warrant mitigation or further investigation.

EAW Item 30. Other Potential Environmental Impacts

The DNR has two concerns that we feel warrant further discussion. The first is prevention and control of wildfire. The EAW does not mention campfire rings or other means of controlling campfires. In addition, the plan calls for revegetation of the area with grasses; however, there does not appear to be a mowing/maintenance plan that would control grass height and therefore wildfire fuel. Our area resource professionals are aware the adjacent area has a history of significant wildfires. We request assurance that the EAW fully address this issue.

The second concern is control of invasive species with respect to firewood. Minnesota is witnessing, both within its borders and in adjacent states, the proliferation of harmful insects transported by firewood. The gypsy moth and emerald ash borer have recently had devastating impacts on forests. Although the DNR does not have authority to regulate firewood outside of state facilities, we recommend firewood brought into the proposed campground be kiln-dried, chemically treated, or otherwise certified insect-free.

Thank you for the opportunity to review this document. We look forward to receiving your record of decision on the need for an EIS for the project, as well as, responses to comments, pursuant to Minnesota Rules part 4410.17000, subparts 4 and 5.

Please contact Bob Leibfried, Ecological Resources Regional Manager, at (218) 327-4232 if you have questions regarding this letter.

Sincerely yours,

Craig Engwall,
Northeast Regional Director
(218) 999-7913

xc: Steve Colvin, Bernice Cramblit, Ron Sanow, Brainerd MN PCA, Keith Pohl, Crow Wing SWCD
MN DNR, ERDB# 2008-0534