



# Minnesota Pollution Control Agency

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April 22, 2008

Mr. Ryan Leister  
Crow Wing Township  
14084 Baxter Drive, Suite 7  
Baxter, MN 56425

RE: North Central Speedway Campsite Environmental Assessment Worksheet

Dear Mr. Leister:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the proposed North Central Speedway Campsite project in Brainerd, Minnesota. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

### Item 8. Permits and approvals required

Item 8 indicates that the MPCA stormwater permit has already been obtained. The National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit currently held on the property (C00021616) covers 18 acres for the parking lot project. If 33 acres of disturbance is to be added to this project, either the existing NPDES Permit and Stormwater Pollution Prevention Plan will have to be revised to reflect the increased disturbance, or a new NPDES Construction Stormwater Permit will have to be acquired.

### Item 10. Cover types

Item #10 indicates that no impervious surface is either existing or will be created for the project, yet item 6.b. indicates that a 50-foot wide service road to provide ingress and egress to the camping area will be created. The construction methods and materials for this road should be indicated here to clarify how this road is being described as pervious, especially given that heavy travel over a long period of time will be likely to compact the surface of the roads.


### Item 20. Solid wastes, hazardous wastes, storage tanks

On April 15, 2008, while inspecting the site for the purpose of gathering information for the EAW comments, MPCA staff observed burn piles containing solid waste such as what appeared to be bedsprings, fiberglass insulation, and other metal objects. This could potentially be a violation of Minn. Stat. § 116.081 for improper disposal of solid waste on the property, or Minn. R. 7035.0800 for failure to have the solid waste properly collected and disposed of. This activity raises serious concerns that good solid waste disposal practices will not be conducted during construction and operation of the proposed project.

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We look forward to receiving your responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the project for the purpose of pending or future permit action(s) by the MPCA. *Ultimately, it is the responsibility of the project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions regarding this letter, please call Scott Lucas at 218-828-6069 or me at 651-296-8011.*

Sincerely,



Jessica Ebertz  
Planner Principal  
Environmental Review and Operations Section  
Regional Division

JE:mbo

cc: Scott Lucas, MPCA, Brainerd