



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

	DATE	NAME	COMMENTS	STAFF COMMENTS
1.	1/04/2021	Eric Linn	<p>Hello , I have a cabin on Island Lake in Wolford Township. I have tried to get better signage to prevent and remind boaters to clean and drain ? Our access is owned by the township which proves to be a disconnect for protecting our lakes . This lake is getting more and more traffic even large boats I'm assuming in pursuit of bass fishing ? No updated signage, no garbage recept, no bathroom, no parking. My family and several neighbors help to pick up and repair ? I have worked with Nicole Erickson on signage costs which was forwarded to Wolford Township. Apparently they have no money or resources to install ? They are also responsible for other lakes which would also then need to be done ? It seems these small , not inspected lakes are getting more pressure , allows boaters on and off easier with no decontamination needed? ***Another concern I have and reported *** with no concern from the DNR ? Boat lift and dock installers with the big rigs that go from lake to lake ? One in our area is Ferrier Dock Service ? This person is often on our lake recreating with the same " rig " ? Pulling a tubers etc . Apparently there is no permitting our guidelines for these " businesses " profiting , mean while spreading the hitch hikers ?? These small lakes need more specific rules to combat the invasive hitch hikers . Good Luck Eric Linn Island Lake Wolford Township 320-250-6195 Sent from my iPhone</p>	<p>Thank you for your comments Eric. Crow Wing County plans to purchase and install 20 signs at high use public landings throughout the County in 2021, which will provide more information about locations and availability of decontamination stations. The signs will be available to lake associations to purchase, and could be covered under the County's AIS awareness grant opportunity. The County provides funds for 18 lakes for lake associations to participate in AIS public awareness campaigns (\$250 per lake with a public boat landing) and this signage would be eligible for the use of those funds. For more details on the AIS awareness grant opportunity through the County, please contact Nicole Erickson, Environmental Services Specialist, at Nicole.erickson@crowwing.us.</p> <p>Concerning Minnesota laws and rules relating to AIS, the following types of activities are not allowed regardless of whether a watercraft inspector or decontamination station is present at a lake landing:</p> <ul style="list-style-type: none">• Transporting watercraft without removing the drain plug.• Arriving at lake access with drain plug in place.• Transporting aquatic plants, zebra mussels, or other prohibited species on any roadway.• Launching a watercraft with prohibited species attached.• Transporting water from Minnesota lakes or rivers.• Release bait into the water. <p>Concerning rules for lift and boat installers, these are referred to as "lake service providers". They are businesses that are hired to install, remove, decontaminate or rent water-related equipment in Minnesota waters. Lake Service Providers must adhere to</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

				<p>the same requirements as any watercraft entering or leaving a body of water.</p> <p>Lake Service Providers must:</p> <ul style="list-style-type: none">• Follow AIS laws and go through inspections like all other citizens using public accesses.• Carry a signed copy of their permit with them and their employees when doing work.• Display a permit sticker in the lower left of the windshield on each vehicle hauling water-related equipment.• Have their employees working with water-related equipment complete online employee certificate training, pass a quiz and carry a wallet-sized certificate when doing work. <p>If you have additional questions about lake service providers, please contact April Rust AIS Training Coordinator for Lake Service Providers (LSPs), at april.rust@state.mn.us. She will be able to answer all your questions about the MN DNR LSP's permitting training and certification.</p>
2.	1/04/2021	Steve Quinn	<p>Dear Committee,</p> <p>First of all, I appreciate and applaud your effort to gather citizen/stakeholder input on this important topic.</p> <p>Let me start with a little background. After getting a M.S. in Fishery Biology, I worked as a Fishery Biologist the U.S. Fish and Wildlife Service and the Georgia DNR from 1980-1988, when I moved to Minnesota to take a job as Editor of In-Fisherman Magazine which I held until my semi-retirement in 2018. I now am a freelance writer on fishing and environmental topics, as well as a Field Editor at In-Fisherman.</p> <p>No surprise, I am an avid angler, fishing 60 to 90 days per year, mostly on waters of Crow Wing, Bass, and Aitken counties. I read the story on today's Dispatch 1/4/2020</p>	<p>Thank you for your comments Steve. Crow Wing County certainly recognizes and appreciates the large role anglers play in preventing the spread of AIS. Concerning decontamination stations, the County plans to continue to operate the Crosslake permanent station and the mobile unit in 2021. We do recognize that there are other decontamination stations in the area that are owned and operated by different agencies / businesses. Although Crow Wing County does not operate Ruth and Gull lake decontamination stations, the County will provide advertising of these and other regional decontamination stations in the following ways in order to promote their use:</p> <ul style="list-style-type: none">• The Crow Wing County website• AIS Decontamination Hotline



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

and wanted to send you some ideas on this topic that I'm highly familiar with, particularly in the realm of aquatic vegetation, as the county has been given a large sum of money for this sort of work.

I was a Certified Pesticide Applicator as part of my job in Georgia, working with the Corps of Engineers on their plans for aquatic vegetation control on very large reservoirs down there, with giant cutgrass and hydrilla the primary targets early on. I also advised private pond owners who wished to limit or eradicate different species of vegetation from their own ponds, recommending herbicides, dosages, cautions, etc.

A few comments; I have used Decon stations at Gull Lake and Ruth Lake. But do not see them on the list. Those workers were knowledgeable and used setting that are appropriate; as you know the high-power setting/heat can damage watercraft.

For a number off years, lake associations have worked to raise money to treat what they term "invasive aquatic species" by formation of so-called "Lake Improvement Districts (LIDs)" or other forms of taxation of lake association members. Some of these have, I believe, tapped into county dollars to fund these efforts.

Widespread overtreatment with herbicides has been a big problem on large lakes, such as Round Lake, the Platte-Sullivan Chain, Serpent Lake, and Upper and Lower Mission Lakes. The target is most commonly curly leaf pondweed, which has been widespread in the U.S. since the late 1800s. It does grow thickly early in the season, but virtually disappears once water temperatures crest 70°F. In some instances, Eurasian milfoil is the target, but it has only rarely reached true problem levels, such as levels seen in Lake Minnetonka in there 1990s, in a few spots in lakes such as Bay and Alexander lakes, and this grows

- AIS Decontamination Texting Hotline (new in 2021)
- MN DNR decontamination location website
- Educating watercraft inspectors and lake association members about decontamination station locations/ details.

The County will continue its efforts to look for better ways to improve on marketing and advertising for decontamination stations in and around Crow Wing County.

Concerning Eurasian Water Milfoil treatments, Crow Wing County will continue to offer funds that will pay for one survey, and all treatments for control of Eurasian Water Milfoil up to \$3,000 total per-lake on 10 eligible infested lakes with a public access.

Concerning Emily, Mary, and Ruth lakes, according to the MN DNR:

- Emily Lake is infested with Eurasian water milfoil
- Mary Lake is infested with Eurasian water milfoil.
- Ruth Lake is infested with both Eurasian water milfoil and zebra mussels.

The MN DNR reviews and approves permit applications and has oversight of chemical treatments. The County provides cost-sharing grants to lake associations to cover those treatments.

Concerning aquatic plant management treatments, the MN DNR aquatic plant management program is designed to balance native plant conservation with the desires of lakeshore residents to recreate and access their property. State law establish what property owners can do to control aquatic plants. MN DNR fisheries aquatic plant management staff administers those controls via a permitting system, not Crow Wing County. For more



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

		<p>primarily in offshore areas that do not deter watercraft, whether kayak or powerboat. This plant also has been present in state waters for most of 100 years, with no deleterious effects on fisheries, though at times to the consternation of dock owners.</p> <p>These treatments, however, scour the lake basin of virtually all native vegetation, as well as the invasive, leading to poor fishing. Applied in correct doses, approved aquatic herbicides do not kill fish, but do destroy habitat for most species, and these effects can linger most of a summer and fall seasons, leading anglers to abandon that waterbody in favor of an untreated lake. In place of vegetation that clears waters and prevents erosion (native or otherwise), we typically see increased growth of algae that takes advantage of phosphorous freed from dead plants, and that from natural sources and many manmade sources as well. Large blooms of green algae and sometimes blue-green algae commonly result. As we know lawns themselves with impervious surfaces and especially where fertilizers or other pesticides are applied, or where shoreline vegetation is removed, funneling phosphorous and nitrogen into the lake to fuel plantlike. The result is a strong downward trend in angling quality for pike, bass, and panfish, which can be indefinite.</p> <p>This is a problem, as these activities take place outside the realm of control of the Department of Natural Resources, where some biologists also decry this trend, but claim to be powerless to prevent this work, as it is okayed by county authorities, such as yourselves, lake associations, and other entities. That's why I am pleased to see input sought from anglers and hunters who strongly support natural resource management through license fees and excise taxes on equipment, as well as their conservation efforts and memberships.</p>	<p>information and details about the DNR's process for reviewing and permitting chemical treatments, please contact Tim Plude, Aquatic Invasive Species Specialist with the MN DNR, at timothy.plude@state.mn.us.</p> <p>Concerning Starry Stonewort, the County is aware of the risk of Starry Stonewort spread within the County and hosts an event every August called "Starry Trek" where volunteers can sign up to participate. Volunteers receive hands on training on how to identify Starry Stonewort and other aquatic invasive species during this event. Then volunteers are provided with all necessary equipment to travel to public landings to check for AIS. This is a great event to get involved in and there are different locations throughout the state. Also, the County provides hands on training and resources to watercraft inspectors on Starry Stonewort, provides information on its website, and provides printed handouts at the Land Services Building to help inform the public about the dangers of Starry Stonewort and other AIS.</p>
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Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

For me, the last "straw" was the herbicide treatments on Lakes Emily, Mary, and Ruth last summer, where no exotic species have been found. Instead, the herbicides destroyed vast stands of beautiful native cabbage (pondweed) species non Ruth Lake, as well as native northern milfoil in Emily and Mary, and virtually every other submerging aquatic type. I asked about this with the lake AIS inspectors, who seem to be not aware of the sources, but have received widespread complaints about occurrence from other anglers. And they verified that exotic invasive plants had not been known there.

Other citizens have told me that these lake associations had extra money that they felt had to be spent to justify getting more dollars next year, so they paid for unneeded and unwanted herbicide treatments. This is second-hand information, with no verification to my knowledge, but I have not sought it out with the association. I have discussed this matter with avid anglers of the region, including In-Fisherman staff, folks with Lindner's Angling Edge, local guides, walleye, muskie, and bass club members, and other anglers who have seen the same problems, yet feel powerless to stop this unfortunate trend.

I feel that in the future, herbicide treatments should be allowed to be paid for and performed by lake groups and counties under auspices and in consultation with DNR fishery biologists, with input from the angling and general public. After all, these lakes are public and should not be controlled or "managed" by private entities, such as those who are privileged to live along their shorelines. Around Lake Minnetonka, there's a thriving business that sends scuba divers to manually remove Eurasian milfoil stalks from in front of lakeshore owners properties. This proves successful for the summer season, but must be done yearly. Many of those homeowners fear the carcinogenic properties of these herbicides, particularly when oversupplied or done regularly over a period of years.



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

		<p>I also wish to emphasize the highly deleterious nature of the starry stonewort, an aggressive plant that, unlike many long-term exotics, tends to wipe out all other submerging plant species and severely damages fish and wildlife habitat. The brunt of efforts to fight invasive aquatic plants should be leveled at this aggressive invader, which has not yet make it presence felt, to my knowledge, in Crow Wing County. We're extremely luck for that as I have seen the toll taken in the Alexandria area and other state waters. Efforts should be made to quickly identify this plant and eradicate it before it can spread further. I've seen some educational material but not enough, in my opinion, as anglers should be recruited to look out for it and report sightings.</p> <p>Again, thanks for inviting comments and taking seriously the threats I describe. I've seen the positive benefits to fisheries and tourism when wide scale herbicides cease (spot treatments only), as was achieved on large Army Corps of Engineers impoundments with hydrilla, such as Lake Seminole on the Chattahoochee and Flint rivers in Georgia, with sections extending into Florida. Case studies with hydrilla in Florida come to this conclusion in waterbodies with substantial deep water (over 18 or 20 feet), as this aggressive plant can take over shallow waters (over 70 percent coverage) found in Florida and other southern locales. This level of infestation damages all uses and is highly deleterious to nearly all fish populations. I would be glad to discuss this topic further by phone, should the need arise.</p> <p>Sincerely,</p> <p>Steve Quinn</p>	
3.	1/05/2021	Darrell Compton AIS program .	Thank you for your comments Darrell. The Crow Wing County Land Use ordinance permits landowners who live



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

		<p>All private boat ramps on private lakeshore should be illegal to use by private land owners.</p> <p>The lakes association has made loopholes in the plan that exclude them from the rules forced on the folks that choose not to live on the lake .</p> <p>They should lead by example not the do as I say not as do mentality.</p> <p>Total waste of tax payers money , there is no stopping the AIS and if it is so important then why are the rules not the same for all .</p> <p>Not to mention the violation of the 4th amendment of the US constitution that was thrown out the window with illegal search of private property.</p>	<p>on a lake with no public access the ability to install a private access ramp with an approved shoreland alteration permit. A MN DNR permit is also required to install a private or public ramp. The County and the MN DNR require certain criteria be met before construction of a private boat ramp. To contact a local MN DNR Area Hydrologist please visit this website at http://mndnr.gov/waters.</p> <p>Regardless if an access point is private to not, the laws of AIS prevention remain the same. A person may not:</p> <ul style="list-style-type: none">• Transport aquatic plants.• Transport Zebra Mussels and other prohibited species of animals.• Place or attempt to place into waters of the state a boat, seaplane, or trailer that has aquatic plants, Zebra Mussels, or other prohibited invasive species. <p>In addition, a person leaving public waters must:</p> <ul style="list-style-type: none">• Drain all water from water-related equipment including bait containers, live wells, and bilges by removing the drain plug before transporting.• Drain plugs, bailers, valves, or other devices used to control the draining of water from ballast tanks, bilges, and live wells must be removed or opened while transporting watercraft. <p>Please visit the MN DNR invasive species laws website at https://www.dnr.state.mn.us/invasives/laws.html to learn more about AIS laws in Minnesota.</p> <p>Crow Wing County conducts a survey of watercraft users every August to record behaviors of those users as it relates to AIS prevention. According to this survey, 99% of watercraft users are aware of the proper steps that need to be taken with their boat, trailer, or other watercraft related equipment to remove aquatic invasive species. And, a majority of watercraft users are implementing good AIS prevention practices.</p>
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Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

				<p>Concerning your statement about the efficacy of AIS prevention programs and inspections, states that have implemented AIS education and watercraft inspection programs have significantly slowed or even stopped the spread of AIS. Even if we only slow the spread of AIS each year they are contained, this could save citizens tens to hundreds of millions of dollars of taxpayer money. Also, preventing the spread of AIS will protect waters, native wildlife, and fish for many more years while ongoing research develops tools to control these species, particularly at the University of Minnesota Aquatic Invasive Species Research Center (MAISRC).</p>
4.	1/14/2021	Cynthia Hipwell and Chris Finberg	<p>I am providing feedback to the AIS plan. Gladstone Lake has not been included in this plan again this year. This is a concern because we now have data from the boat counter that proves what we have anecdotally experienced that our lake is getting more and more public day use. One of the reasons that this is particularly important is because Gladstone does not have any invasive species yet. It is important to preserve this situation in lakes where we still can. These lakes should be prioritized. Lakes that are getting high usage, but no monitoring are at increased risk of contamination. If our lake has a highly used public launch, this launch should be monitored. Given the seriousness of this situation, if there are not resources to monitor, maybe the public launches where there are no resources to monitor should be closed? Please look at our data and consider adding monitoring hours to our lake.</p> <p>Thank you,</p>	<p>Thank you for your comments Cynthia and Chris. Crow Wing County uses an online dashboard model called AIS Explorer and the County's inspection per-hour data to determine prioritization of watercraft inspectors. The model predicts coverage of at least 80% of watercraft moving from infested to uninfested water bodies. This includes estimates of watercraft traveling from within the county, within the county to outside the county, and outside the county to within the county. This data is derived from the Minnesota Aquatic Invasive Species Research Center (MAISRC) and the MN DNR watercraft inspection field collected data. We believe this approach has and will effectively assist with preventing the spread of AIS while educating the most amount of people at targeted landings.</p> <p>Based on the results of the AIS Explorer model, Gladstone Lake appeared in the model results at #44. With finite resources, it is impossible to inspect all 130+ public accesses in Crow Wing County. Only 42 public landings were identified and prioritized for watercraft inspections in the 2021 County AIS Prevention Plan. The County certainly considered Gladstone Lake with its 1.42 average inspection per-hour data for the last three years.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

				<p>Based on the data, if the County were to include Gladstone in the 2021 AIS Prevention Plan for inspection hours, it would be ranked the lowest inspection per-hour average out of the 42 public landings identified in the plan. As such, Gladstone Lake is not included in the list of lakes identified to be inspected by County staff.</p> <p>With that being said, Crow Wing County recognizes the passion that homeowners and lake associations have in protecting Gladstone Lake from aquatic invasive species infestation. The County will continue to analyze Gladstone and other lakes' data to determine the best approaches to prioritizing watercraft inspectors in the future. In the meantime, there are other ways folks can get involved:</p> <ol style="list-style-type: none">1. Homeowners and lake association members can sign up to become an AIS volunteer and receive training from the MN DNR. Please contact Keri Hull, Watercraft Inspection Supervisor with the MN DNR for more details, at keri.hull@state.mn.us.2. The County will continue to provide the option to Gladstone and other lakes to request inspector coverage through the use of their own (or other) funds as the availability of inspectors allows.3. Work with the County to install signage at public landings.4. Explore grant opportunities with the County and MN DNR on AIS education and prevention.5. Volunteer and sign up for AIS events including Starry Trek and online research presentations.
5.	1/15/2021	Kris and Kurt Anderson	. To the Crow Wing County group, We have been homeowners on Gladstone Lake for over 20 years and we are very interested in keeping our lake as	Thank you for your comments Kris and Kurt. Crow Wing County has over 500 lakes and rivers. Out of those 500 waterbodies, only 13% are infested with aquatic invasive



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>pristine as possible. We are aware that as one of the only lakes in the area that still has no invasive species, it is of great importance to do all that can be done to prevent this from happening to our lake as well. We have noticed quite a bit more use via our public landing over the past several years and without public access inspections, we fear that protecting our lake will be nearly impossible. We are asking for support from the county this year as we have not been on the list for the past few years.</p> <p>Assuming that prevention of invasive species is one of the prime objectives of having public access inspections, I would hope our lake would be at the top of the list.</p> <p>Respectfully, Marsh Lane on Gladstone Lake</p>	<p>species according to the MN DNR. The County takes great pride in protecting our waters in the area. Crow Wing County partnered with the University of Minnesota – Aquatic Invasive Species Research Center (MAISRC) and the United States Department of Agriculture – Forest Service to develop an optimized model for locating DNR trained watercraft inspectors on Crow Wing's County's public watercraft landings. MAISRC developed an online dashboard of this model called AIS Explorer for local government AIS managers and staff. This online dashboard uses existing infestation information, water connectivity risk modeling, and over 1.6 million boater movement survey results to forecast the introduction risk of four priority AIS (zebra mussels, Eurasian watermilfoil, starry stonewort, and spiny waterflea) at individual lakes throughout the County. The County used this model to prioritize placement of watercraft inspectors on exiting infested lakes rather than uninfested lakes because watercraft inspectors are trained to focus on exiting inspections to make sure the boater is following Clean, Drain, Dry protocol before going into another waterbody.</p> <p>Concerning watercraft traffic, the County has noticed a slight increase at all public landings the last few years. We believe that due to the Covid -19 guidelines the public increased their usage at the public landings. The County will continue to monitor and record these changes.</p> <p>Concerning Gladstone Lake watercraft inspections, please refer to public comment response #4.</p>
6.	1/22/2021	Larry McCulley	<p>Hello,</p> <p>I would like to advocate for Gladstone Lake residents. Gladstone Lake is one of a very few Crow Wing County lakes that currently has no AIS. It seems to me that a good policy would be to invest money ensuring a lake that currently is not dealing with AIS can remain</p>	<p>Thank you for your comments Larry. Concerning funding for AIS infested lakes, the County only has a limited amount of resources and funds to protect our beautiful lakes from aquatic invasive species. For more detail please refer to public comment #8.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>that way. Gladstone is a small lake with lower use than other nearby lakes, however any efforts to keep an AIS free lake clean would be money well spent. I appreciate your consideration.</p> <p>Larry McCulley Gladstone Lake resident 612-790-3622</p>	<p>Concerning AIS inspections on Gladstone Lake, please refer to public comment responses #4 and #5.</p>
7.	1/25/2021	Bob Stupka	<p>My name is Bob Stupka and my wife Diane and I have been residents on Gladstone Lake and have been enjoying its beauty since 2009. Before that, we enjoyed our family's cabin on Lake Hubert starting in 1977, and for the 20 years prior to that, we stayed at a resort in the area. It is safe to say that I have been coming to the Brainerd Lakes area for virtually my entire life.</p> <p>When we arrived on Gladstone we realized that there was no group of neighbors that had gotten together to look out for the welfare of the lake and to relay those "nice to know topics" that always come up. Since we were very familiar with the Lake Hubert Conservation Club and later learned of the Little Lake Hubert Association we decided to attempt to start one on our lake. After a slow start, we now have a listing of roughly 53 of our 85 residents who are part of our group.</p> <p>Our primary goal is to maintain the lake in its current pristine state not just for today but for years to come. We have actively done testing on our lake for years but we feel the number one way to accomplish this is to have our public access monitored by Crow Wing County. A few facts:</p> <ul style="list-style-type: none">- We currently have no AIS in our lake.- Inspections were done on Gladstone for 3 or 4 years before they were discontinued.	<p>Thank you for your comments Bob, and thank you for your commitment to helping prevent the spread of AIS in Crow Wing County. You are helping make Crow Wing County, 'Minnesota's Favorite Place!'</p> <p>Concerning Gladstone boat counter data, the County used this data to determine the best peak time of day and overall days of the week to staff watercraft inspectors at public landings. This data is not completely accurate and can double count (or more) movement when it comes to inspection per-hour data. This anecdotal evidence shows that the traffic is trending higher. Over the past few years, the County has seen an increase at all public landings through our inspection per-hour data including Gladstone.</p> <p>Concerning AIS inspections and watercraft traffic on Gladstone Lake, please refer to public comments responses #4 and #5.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>- The last two years we have raised money to continue these inspections but we have learned that when you are not part of the "official" Crow Wing County inspection program our coverage is spotty at best due to the availability of inspectors.</p> <p>- We had a traffic counter at our access for part of last summer and although we have been told that these are not completely accurate the numbers to me are staggering. July's reading was 3107, August was 2843, September was 1791 and the reading for October was 874.</p> <p>- Almost 60 % of the traffic at our access takes place on the weekends.</p> <p>- We know just from observation, that traffic on Gladstone Lake is up dramatically.</p> <p>Please reconsider your decision not to include Gladstone Lake in your AIS inspection program for 2021. Doesn't it make sense to do everything in your power to keep one of the last lakes in the area that is free of AIS to keep it that way? Thank you in advance for your consideration.</p> <p>Bob</p>	
8.	1/31/2021	Bob Stancer	<p>Regarding: Proposed 2021 Crow Wing County AIS Plan</p> <p>Dear Board of Commissioners,</p> <p>The Fifty Lakes Property Owners Association (FLPOA) would like to offer comments and suggestions to the proposed 2021 Crow Wing County AIS Plan.</p> <p>In 2020, our association was very satisfied with the execution of the county AIS plan. We especially appreciated the job Nicole Erickson did in managing the plan and program. Nicole demonstrated the ability to be flexible, fair and had excellent people skills.</p>	<p>Thank you for your comments Bob. Concerning watercraft inspections in Fifty Lakes, The County's prioritization of watercraft inspectors is based on AIS Explorer model results and the County's inspection per hour data described in public comment response #4. Based on this data and results, the four lakes with public landings in Fifty Lakes were not identified out of the 42 public landings identified in the 2021 AIS Prevention Plan.</p> <p>Concerning inspection per hour data, The County understands and agrees that three out of the four lakes in</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

		<p>The only problem the association had with the 2020 AIS plan was not enough watercraft landings in the county were covered using AIS inspectors from state funds.</p> <p>In Fifty Lakes there are four lakes with public landings and a fifth lake without public access. The five lakes represent over 1750 acres of non-infested AIS water. The county provides 300 hours of inspections at one landing. The other three landings have inspectors scheduled by the board and coordinated with Nicole Erickson the inspector salary for the other 3 lakes was paid for from funds donated by property owners and FLPOA members.</p> <p>Three of the four public landings in the city had an average of over one inspection per-hour for 2018-2020 but only one received state funds for inspectors.</p> <p>The county is using a model that was developed by the Minnesota Aquatic Invasive Species Research Center (MAISRC) and the United States Department of Agriculture - Forest Service.</p> <p>The model is called AIS Explorer. This model is able to trace the movement of watercraft from lake to lake in the state. The county has used this model to develop the 2021 proposed AIS plan. The plan only funds 42 landings out of over 130 public watercraft landings in the county.</p> <p>State funds are being used to fund these 42 landing. The association is asking the county to search for or alter the proposed plan to find additional funds to provide inspectors at some of the lakes that are not infested with AIS.</p> <p>The following are some reasons to increase funding for AIS inspectors at non-infested public landings.</p> <ol style="list-style-type: none">1. The Minnesota DNR list of AIS infested lakes in the state identifies over 50 lakes in	<p>Fifty Lakes had an average of over one inspection per-hour. However, all public landings throughout the County under consideration for watercraft inspections either had either higher inspections per-hour three year average data or were included within the model results out of the 42 public landings identified in the 2021 AIS Prevention Plan (or both). In the past few years, the County has seen an increase in all public landings through our inspection per-hour data derived from watercraft inspections. Based on the results of the model and inspection data, Crow Wing County believes that the 2021 watercraft inspection program allocation of inspection hours will effectively prevent the spread of AIS while educating the general public at those targeted landings.</p> <p>Concerning additional funds, Crow Wing County received \$440,901 AIS aid from the State of Minnesota for 2021 and 80% of these funds support the County's watercraft inspection program. The County's AIS aid is based 50% on the number of public "watercraft trailer launches" and 50% on watercraft trailer parking spaces according to the Minnesota Department of Revenue. In fall, 2020, County staff visited all of the public accesses in Crow Wing County to get accurate estimates of trailer spaces and other metrics. Information obtained concerning County accesses will be submitted to the State of Minnesota. We are hopeful that based on more accurate and precise counts of landings and parking spaces, Crow Wing County will see an increase in AIS aid from the State of Minnesota. And, we continue to search for funding opportunities with local and state partners. For example, in 2021, the County plans to implement a \$5,000 grant awarded by the MN DNR to start an AIS Clean. Drain. Dry. Campaign/pilot program.</p> <p>Concerning local sources of funding beyond what is provided from the State of Minnesota, that is a question</p>
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Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

		<p>Crow Wing County that are infested with zebra mussels. In 2020 data from the DNR indicates three of the lakes in Fifty Lakes had visits from watercraft that came from lakes that were infested with starry stonewort.</p> <p>2. A couple of years ago the MAISRC identified Crow Wing County as a hot bed for the zebra mussel. The MAISRC has also said that AIS is spread by boat hoppers and that the best method to prevent the spread of AIS is having an inspector at the landing.</p> <p>3. The role of the inspector at a landing is education, prevention and enforcement and probably the most important is education. The education is working. Experienced AIS inspectors are saying that more watercraft owners know the laws and have followed the rules concerning their watercraft.</p> <p>4. Fifty Lakes is completely surrounded by infested lakes. These lakes are infested with zebra mussels and/or Eurasian milfoil. These are some important reasons for protecting more public landings of non-infested lakes. The MAISRC continues to experiment with ways to eradicate or control the AIS species that are infesting our lakes, rivers and streams. The research center is closing in on some treatment methods to accomplish this mission but still needs time to accomplish them.</p> <p>Thank you for your consideration; Bob Stancer President Fifty Lakes Property Owners Association (FLPOA)</p>	<p>best addressed by policy makers within the County (i.e., the County Board of Commissioners).</p> <p>The County will continue to analyze Fifty Lakes public landings to determine prioritization of watercraft inspectors in the future.</p> <p>In the meantime, there are other ways folks can get involved:</p> <ol style="list-style-type: none">1. Homeowners and lake association members can sign up to become an AIS volunteer and receive training from the MN DNR. Please contact Keri Hull, Watercraft Inspection Supervisor with the MN DNR for more details, at keri.hull@state.mn.us.2. The County will continue to provide the option to Fifty Lakes and other lakes to request inspector coverage through the use of their own (or other) funds as the availability of inspectors allows.3. Work with the County to install signage at public landings.4. Explore grant opportunities with the County and MN DNR on AIS education and prevention.5. Volunteer and sign up for AIS events including Starry Trek and online research presentations.	
9.	1/30/2021	Vicki and Lervy Edminster	Because of all the boat traffic we see on Gladstone on any given day it's important that someone is there to monitor the traffic. Thank you	Thank you for your comment Vicki and Lervy. The County understands the importance of protecting lakes from aquatic invasive species infestation. Please refer to public comments #4 & 5 staff responses.



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

10.	1/30/2021	Nick Bernier – president Mission Lakes Association	<p>Nicole --- thank you for all the information. The reports of the LID's is very helpful – as we may have to try to form one for Mission Lakes. Also – it is appreciated that the county board reinstated the 50% + 1 threshold for forming an LID.</p> <p>We at Mission Lakes Association are struggling with significant infestations of both CLP and EWM and insufficient funds for adequate treatment. We continue to be concerned that we are at the very highest risk in the county (Upper Mission Lake) for future infestation of zebra mussels but yet are allotted no inspection hours. Although we have significant fishing pressure at intervals previous surveys have not captured this – and therefore we are labeled as low traffic volume. Our funds are stretched to the max with AIS treatment and we have no reserves for another new AIS infestation or for inspection costs.</p> <p>Our association goals are simple – to maintain our lakes fishable, swimmable, navigable, and retain natural beauty for the future.</p> <p>Any ideas/suggestions?</p>	<p>Thank you for your comments Nick. Concerning aquatic plant management, Crow Wing County will continue to offer funds that will pay for one survey and all treatments for control of Eurasian Water Milfoil up to \$3,000 total per-lake on 10 eligible infested lakes with a public access. Also, the MN DNR is offering grant funds for aquatic plant management in 2021 (details will be posted soon).</p> <p>Concerning zebra mussel infestation, in 2020 County staff ran the introduction risk for surveillance model that the Minnesota Aquatic Invasive Species Research Center developed. In 2021, Upper and Lower Mission have a low percentage (0.24%-0.50%) of becoming infested with zebra mussels. The County will continue to update this model regularly to accurately predict infestation from multiple AIS.</p> <p>Concerning inspection surveys, the County's data captured from boat counters buried from 2015 through 2019 shows that the vast majority of traffic and use on lakes occurs between Friday and Sunday from 9:00am to 4:00pm. And therefore, we believe the data points gathered from Mission Lakes in the past is an accurate reflection of the overall usage patterns of the lake, which indicated a relatively low number of watercraft that use the landings on a per-hour basis.</p> <p>Concerning suggestions for how the Mission Lakes and its member association can help prevent the spread of AIS, we offer the following:</p> <ul style="list-style-type: none">• Participate in the County's AIS awareness grant opportunities and AIS events.• Participate in MN DNR aquatic plant management grant opportunities• Lake association members can sign up to become an AIS volunteer and get training from the MN
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Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

				<p>DNR. Please contact Keri Hull, Watercraft Inspection Supervisor with the MN DNR for more details at keri.hull@state.mn.us.</p> <ul style="list-style-type: none">• Volunteer and sign up for AIS events including Starry Trek and online research presentations.• Work with the County to install signage at public landings.• Follow Clean, Drain, Dispose, and Dry protocol from the MN DNR.• Educate homeowners about AIS.• Decontaminate your watercraft to prevent the spread of AIS. Call the Decon Hotline at 218-824-1055 or visit crowwing.us/AIS to find locations of Crow Wing County decontamination stations near you. <p>Feel free to contact Nicole Erickson, Environmental Services Specialist with Crow Wing County, at Nicole.erickson@crowwing.us for more information about how to get involved in preventing the spread of AIS.</p>
11.	1/30/2021	Gary Grey	<p>It's been noted that Gladstone has again been left off the inspection service plan which I believe is for the third straight year. In that many lakes that surround us that already have infestation of one sort of the other, I'm curious as the boat count at our landing for the past three years. I haven't been able to find this data but I'm wondering if it has increased significantly with the increased inspections at nearby lakes. My thought is, after conversations with at least a few boaters visiting our landing, is that they are there primarily to avoid the hassle and time involved with inspections in using lakes near us such as Round and Lake Hubert. It'd also be interesting to me to determine where the boats coming in originate and if we are a "destination lake" due to inspections around us. Including at least an entry level of inspection hours at lakes such as ours seems to make a bit of sense. Thanks</p>	<p>Thank you for your comments Gary.</p> <p>Concerning incoming watercraft data, the MN DNR survey results are posted online throughout the season. This data is public and anybody may access it at any time. For additional questions or training about the MN DNR watercraft inspection data, please contact Nicole Erickson, Environmental Services Specialist, at Nicole.erickson@crowwing.us.</p> <p>Concerning AIS in Gladstone Lake, please refer to public comment responses #4, #5, and #7.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>for your time and the opportunity provide some commentary on your 2021 AIS plan.</p>	
12.	1/30/2021	Brian and Kris Ebent	<p>Hello, We are property owners on Gladstone Lake and were disappointed to see that Gladstone is not included on your list for boat inspections this summer. Gladstone is one of the few lakes in the area that is still free of invasive species. Having boat inspections at the public access would be a great help in keeping it that way, and we believe the boat counter data supports having Gladstone added to the list.</p> <p>What can we do to get Gladstone on the list?</p> <p>Sincerely, Brian and Kris Ebent</p>	<p>Thank you for your comment Brian and Kris. Concerning inspections hours on Gladstone, the County will continue to provide expanded coverage requests for lake association in 2021. We'll continue to look at the model results and inspection per-hour data yearly to consider watercraft inspection hours for future years on Gladstone. Concerning AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>
13.	1/31/2021	Steve Gatlin	<p>Dear County Officials, my name is Steve Gatlin. I own property on the south side of Gladstone Lake. I am contacting you to request consideration for adding Gladstone Lake to your list of lakes with a County funded seasonal watercraft inspection program.</p> <p>I have reviewed the County's 2021 AIS Plan. You are proposing over 17,000 inspection hours at various boat access locations. Gladstone is not on this list. Gladstone Lake is one of the few lakes in the area without an AIS problem. Your Plan shows a model where you project there is nearly a 17 percent chance Gladstone would become infested by 2025.</p> <p>It seems to me it would make sense to make a better effort to protect lakes not currently infested with AIS. To that end I would request that Crow Wing County include Gladstone on your list of lakes having a funded access inspection program for 2021.</p> <p>Thank you for your consideration.</p>	<p>Thank you for your comments Steve. Concerning Gladstone's prediction to be infested, the County has two different models with different implications. The first model reflects watercraft inspector priority placement based on existing infestation information, water connectivity risk modeling, and over 1.6 million boater movement survey results to forecast the introduction risk of four priority AIS (zebra mussels, Eurasian watermilfoil, starry stonewort, and spiny waterflea) at individual lakes throughout the County. The second model reflects the percent chance of Zebra Mussel infestation based on early AIS risk surveillance that targets lakes that should to be searched for AIS. These updated results will be reflected in the 2021 AIS Prevention Plan and the County will continue to update this model yearly to predict infestation.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

				Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
14.	1/31/2021	Patti Neiman and Bill Love	<p>Crow Wing County AIS Program, As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake pristine in this way.</p> <p>Sincerely, Patti Neiman and Bill Love</p>	Thank you for your comment Patti and Bill. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
15.	1/31/2021	Kathleen Gesensway	<p>Hello We have a cabin/home on Gladstone lake. As the intention of this plan is prevention of invasive species, we are one of the few lakes where this goal could be achieved with your help. Please consider adding us to your inspection list for 2021 to enable our lake to remain free of invasive species.</p> <p>Thank you! Kathleen Gesensway</p>	Thank you for your comment Kathleen. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
16.	1/31/2021	Kris Koshiol	<p>Crow Wing County AIS Program, As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake pristine in this way.</p> <p>Sincerely, Kris Koshiol</p>	Thank you for your comment Kris. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
17.	1/31/2021	David and Katie Gesensway	<p>Hello- Katie and I are residents on Gladstone Lake (Nisswa), and are asking you to please help partner with our Lake-owners Association to restart boat inspections at our</p>	Thank you for your comment David and Katie. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>relatively busy public landing in 2021, and help us try to keep Gladstone Lake free of invasive species.</p> <p>Thank you!</p> <p>David and Katie Gesensway</p>	
18.	2/1/2021	Robert Miller & Andrea Koob	<p>Greetings,</p> <p>As a property owner on Gladstone Lake, we respectfully request you include inspections on Gladstone Lake for 2021. We request based on four reasons:</p> <ol style="list-style-type: none">1. As one of the few lakes in the area with no invasive species2. We are a full time resident that lives next to the public access and witness first hand the high traffic this lake gets year around. Weekly soft water the access is overflowed and rigs park out on the road. From first ice out to freeze up.3. The numbers you collected on the ramp counter is also a data indicator of the high boat use this lake gets.4. Lastly, multiple fishing guides are on this lake. Daily, weekly, some multiple trips a day and many late morning and afternoon. All indications of these boats coming from area water and some infested water first before visiting Gladstone. <p>This lake is at high risk and should be a top priority for the inspection program for the 2021 season.</p> <p>Thank you for allowing input.</p> <p>Robert Miller & Andrea Koob</p>	<p>Thank you for your comment Robert and Andrea. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>
19.	2/1/2021	Scott & Mary Neiman	<p>Crow Wing County AIS Program,</p> <p>As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake protected. Thank you for your time and consideration.</p>	<p>Thank you for your comment Scott and Mary. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			Sincerely, Scott & Mary Neiman	
20.	2/1/2021	Dwain and Martha Warner	Crow Wing County AIS Program, As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake pristine in this way. Sincerely, Dwain and Martha Warner	Thank you for your comment Dwain and Martha. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
21.	2/1/2021	Kurt Koshiol	Crow Wing County AIS Program, As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake pristine in this way. Sincerely, Kurt Koshiol	Thank you for your comment Kurt. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.
22.	2/1/2021	James Whitlach	We have a cabin on Gladstone lake at 8281 Gladstone Lake Road. I have been coming to Minnesota and Gladstone Lake since 1964. We are disappointed that Gladstone Lake is not receiving support for full-time inspections for invasive species. As the intention of this plan is prevention of invasive species, we are one of the few lakes where this goal could be achieved with your help. There are fewer and fewer unaffected lakes and like preventive medicine, the cost of prevention is much less than the cost to cure. Please consider adding us to your inspection list for 2021 to enable our lake to remain free of invasive species.	Thank you for your comment James. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

			<p>Preserve Gladstone Lake free of Invasive species for now and into the future. It will save everyone money in the long run and preserve a special lake in a special area!</p> <p>Thank you.</p>	
23.	2/1/2021	Brent	<p>Crow Wing County AIS Program -</p> <p>We have property on Gladstone lake and would really like to see the inspectors at the landing this year - let me know if there is anything that I can do to help that happen.</p> <p>Thanks, -Brent</p>	<p>Thank you for your comment Brent. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>
24.	2/1/2021	Gary and Barbara Heimer	<p>Dear Reader:</p> <p>We have been property owners on Gladstone Lake since 1980, built a permanent home here, and thus have enjoyed the many benefits of lake life with our family, our friends, and neighbors, both near and far. We have furnished very convenient public access in order to share Gladstone Lake with any and all of those who would chose to use it. And we believe this is as it should be.</p> <p>With these open policies, comes the dangers of invasive species damaging Gladstone Lake and all other open lakes. To this point, we support and applaud the efforts of the Crow Wing AIS Prevention Plan.</p> <p>As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the inspection list this year. As one of the few lakes in the area with no invasive species, we feel it is very important to include Gladstone Lake on the programs inspection list.</p> <p>Respectfully,</p> <p>Gary and Barbara Heimer</p>	<p>Thank you for your comment Gary and Barbara. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

25.	2/1/2021	Jeanne and Bennett Green	<p>As property owners on Gladstone Lake, we respectfully request that you consider including our lake on the public access inspection list this year. As one of the few lakes in the area with no invasive species, we feel it should be a top priority to keep our lake pristine in this way.</p> <p>Sincerely, Jeanne and Bennett Green</p>	<p>Thank you for your comment Jeanne and Bennett. Concerning watercraft inspections and AIS in Gladstone Lake please refer to public comment responses #4, #5 and #7.</p>
26.	2/1/2021	WAPOA	<p>February 1, 2021</p> <p>Jacob Frie Environmental Services Supervisor Crow Wing County Jake,</p> <p>We look forward to working together for another successful year in our fight to limit the spread of additional AIS on the Whitefish Chain of Lakes. Our belief is that inspections are the most important thing we can do to stop the spread of AIS. This is our last line of defense.</p> <p>First, we want to recognize the quality of the work being done by the current county staff and inspectors. Nicole Erickson and her staff have been a pleasure to work with this past year.</p> <p>To help strengthen that defense we request a meeting with CWC decision makers to better optimize the hours we have available. Some thoughts and concerns:</p> <ul style="list-style-type: none">• Reallocation of unused hours before seasons end rather than having carryover hours year to year.• Flexibility in moving allotted inspection hours from one access to another on the Whitefish Chain.	<p>Thank you for your comments. We thank you for being a vital partner to both the County's and MN DNR's fight against the spread of AIS. We know that without lake associations and other partners, we could not be as successful or as informed about opportunities as we are in this fight. You are part of the reason why over 5,000 hours of additional inspection hours beyond the County's allocated hours in 2020 were implemented. And, you're part of the reason why lakeshore property owners are more informed than ever about the dangers and risks of AIS and how they can be empowered to make a difference in the fight. Again, we thank you for your commitment in this endeavor.</p> <p>Concerning reallocation of inspection hours, Crow Wing County has always made it a priority to ensure all of the core landings identified in the AIS Prevention Plan receive their full allotment of inspections. 2020 was the only year in recent times where more than 30 hours of unused hours went unallocated by season's end. In that case, 99.6% of all hours identified in the plan were inspected by October 1st. A total of 54 inspection hours were left "unspent" on 4 landings. The hours were not used because either a.) less than half of a typical shift remained open on the landing and so were left unallocated, or b.) the availability of inspectors to work a</p>



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

- Discuss how to control plan expenses which now consume 25% of total allocated dollars.

We would also like to discuss the economic importance of keeping our lakes free from additional AIS and the critical need for CWC to allocate additional funding in this fight. For this discussion we would like to include not only people who can strategize new ideas but most importantly people who can authorize and implement additional dollars needed. We have copied those people listed on the following page that we feel would be helpful to have in a meeting on these topics.

Regards,

Joe Brodil
Past Director of AIS/Inspections, WAPOA

Robb Reid
Director of AIS Inspections, WAPOA

Tony Coffey

Anthony E. Coffey
WAPOA President

prime weekend shift to fulfill the landings' hours was not possible. Even with the reasons above, landings actually ended up receiving the full inspections hours planned overall by virtue of the MN DNR conducting inspections on many of those same landings when the County was not able to conduct inspections. Nevertheless, the County will look at identifying any potential gaps in unallocated hours later in the season and determine if there are opportunities to reallocate those hours to other landings where practical and feasible.

Concerning shifting inspection hours across different landings within the season, for many years, the County has implemented a policy to staff landings with higher allocated hours (i.e., 520 hour landings) before covering landings with mid-range hours (i.e., 300 hour landings) and lower (i.e., 100 hour landings). This has meant that if an inspector was not available to cover a shift at Crosslake Southwest landing (for example), a different inspector from a lower-risk landing (i.e., 300 hour landing) is shifted away from that landing and staffed at Crosslake Southwest. We will continue to implement this policy and prioritize inspecting landings that the model and average inspections per-hour data show are at greater risk.

Concerning controlling plan expenses, Crow Wing County's mission is to "deliver value" and "drive results." To that end, we understand the important responsibility of spending wisely the resources afforded to us through the State of Minnesota's County (local) aid monies. Because of that, beginning in 2019, we shifted away from the model of utilizing a third-party staffing agency to employ inspectors and administer some aspects of the watercraft inspection program. Doing so resulted in the County being able to maintain and in some cases



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments

increase the number of inspection hours, provide a more stable and year-round administration of the AIS program through more focused staffing (i.e., hiring of Environmental Services Specialist), increase the quality and number of inspectors through strategic wage increases, save lake associations money on expanded coverage requests by an average of \$4 per-hour, and increase the amount of decontamination hours available through the purchase of a mobile decontamination station. We believe this is of great value to County citizens and partners (i.e., lake associations) and we will continue to look for practical and innovative ways to minimize expenses all while maintaining a high-quality inspection program. That includes taking a look at overall expenditures mid-way through the year to see if there are potential opportunities for enhanced AIS protection.

Concerning authorizing additional local funds to supplement State aid monies allocated to Crow Wing County, that is a question best addressed by policy makers within the County (i.e., the County Board of Commissioners). With that being said, in fall, 2020, County staff visited all of the public accesses in Crow Wing County to get accurate estimates of trailer spaces and other metrics. Information obtained concerning County accesses will be submitted to the State of Minnesota. We are hopeful that based on more accurate and precise counts of landings and parking spaces, Crow Wing County will see an increase in AIS aid from the State of Minnesota moving forward. The County continues to search for funding opportunities with local and state partners. For example, in 2021, the County plans to implement a \$5,000 grant awarded by the MN DNR to start an AIS Clean. Drain. Dry. Campaign/pilot program.



Proposed 2021 Aquatic Invasive Species Prevention Plan Public Comments