

September 15, 2013

Lessard-Sams Outdoor Heritage Council
100 Rev. Dr. Martin Luther King Jr. Blvd.
State Office Building, Room 95
St. Paul, MN 55155

Dear Members of the Lessard-Sams Outdoor Heritage Council:

I wish to voice my opposition to the MN COLA LSOHC funding recommendation request for HAIS- 4 Statewide AIS Facilities and Equipment.

I agree that AIS is a threat to our lakes and rivers. We need to balance resource protection with maintaining access to our public lands and waters. MN COLA is a property owner's association. Their membership and other partner organizations such as MN Lakes and River Advocates are involved in many efforts that do benefit public use of lakes and rivers and improve the quality of Minnesota's public waters. The citizens of MN and our valued visitors have benefited greatly. Despite many worthwhile activities meant to benefit the public some of MN COLA's motivations for conservation efforts are aimed at protecting their own property values. Reducing the AIS threat would, speculatively, protect property values. Restricting, deterring, or otherwise regulating public water access would help meet that end. This proposal, although made with the best of intentions, will restrict access to our state most valued resource – our public waters. Although it may have some effect on slowing the spread of certain AIS, primarily zebra mussels, implementation will have wide ranging negative impacts on the outdoor recreation and tourism industry. These impacts will outweigh any real or perceived impacts of AIS. This proposal will put Minnesota's outdoor heritage at risk.

Briefly:

- Seriously underestimates costs. In the DNR consultant's report titled "Final Report to Identify Options and Cost for Implementing Statewide Measures to Prevent the Spread of AIS"; Thompson Engineering; February 2012, a plan similar to this proposal carries an ANNUAL cost of nearly 60 million dollars.
- Does not identify what long term funding is needed to sustain the proposed plan. Seems to imply the plan is to allow "LGUs time to establish their funding sources"
- Fails to provide alternative plans to make the proposal successful should requested funding not cover projected costs, assumed secondary funding sources become unavailable, technical aspects of the proposal prove unworkable, or the event of unfavorable court rulings.

- MN COLA specifically states in “Strategy #1” (see following) this proposal is “short term”, “not ideal”, and intended “buy time” waiting for more cost effective solutions.

Following are my comments on some elements of the MN COLA proposal for your review:

Design and Scope of Work:

*AIS pose the biggest threat to Minnesota's waters. Our proposal focuses **primarily on zebra/quagga** mussels due to their damaging ecological impacts on the fish habitat, while our proposed solutions address zebra/quagga mussels plus other AIS transported by humans. AIS scientists view “transport by people” as the primary vector for the spread of zebra mussels and many other AIS; not waterfowl as per popular myth.*

- Proposal primary focuses on zebra/quagga mussels. There are many AIS known and possible in the future. Each lake and river is an ecological entity onto itself. The effect of ZM on one body of water compared to another will likely be very different. ZM could have minimal impact on one body water whereas rusty crayfish for example might have greater impact on that same body of water. Following is an outline of three problems MN COLA hopes to address. Not once in the problem statements following (below) is an AIS other than ZM specifically addressed.

Problem #1: Long-term impact to fish habitat from zebra/quagga mussels Zebra/quagga mussels “have the ability to change aquatic ecosystems including native plant and animal populations. The amount of food the mussels eat and the waste they produce has negative effects on the ecosystem and can harm fisheries. As filter feeders, these species remove large amounts of microscopic plants and animals that form the base of the food chain, reducing available food for native aquatic species. Zebra mussels attach to and encrust native organisms, essentially smothering them and removing more animals from the food chain.”

“Most of the impacts of zebra mussels in freshwater systems are a direct result of their functioning as ecosystem engineers (Karayayev, et al. 2002). An individual zebra mussel can filter one to two liters of water each day; as a result high densities of zebra may cause major shifts in the plankton communities of lakes and rivers. Reductions in phytoplankton numbers and biomass also limit food to fish larvae and other consumers further up the food chain (Birnbaum 2006)”. [Attachment#130]

The Great Lakes has suffered from zebra and quagga mussels for over 20 years and may be a predictor of our future if we are unable to stop the spread of AIS. Research has found that the “biodiversity of the Great Lakes ecosystem has been devastated by zebra mussel colonization as evidenced by declines in native clam populations and the loss of spawning habitat for some native fish species.”

- See comments above for Design and Scope of Work. Only one type of AIS addressed.

Problem #2: Likely secondary effects on waterfowl. Scientists with the U.S. Geological Survey think a complex interplay of invasive species may be the cause of the mass die-offs. "The researchers suspect invasive zebra and quagga mussels create ideal conditions in Lake Michigan for the bacteria that produces botulism toxin. The mussels filter the water so it's incredibly clear, allowing an algae called cladophora to grow in huge amounts. Storms churn up the algae, which settle to the lake bottom and rot. That creates an environment without any oxygen, an ideal home for bacteria that produce botulism. The toxin is ingested by tiny worms and freshwater shrimp, which are eaten by fish, including the invasive round goby, which are then eaten by diving birds -- including loons".

- Conclusion of referenced study is speculative and applies to the Great Lakes ecosystem. Again Problem #2 is limited to one type of AIS.

Problem #3: Unavailability of decontamination capability. While education, with emphasis on personal responsibility is essential, the means for residents and visitors to decontaminate must be made reasonably convenient and available. Unfortunately, it is not and most people who want to do the right things simply cannot, harming our efforts to stop the spread.

- What is the working definition of decontamination? It needs to be further clarified. Decontamination only needed if evidence of AIS or some other verifiable high risk. Relatively few watercraft may need decontamination if we are defining decontamination as a high pressure 140 degree decon typical of equipment in use.
- Parking a boat in a driveway for 7 days and sponging out water (if any) would be considered decontamination. It costs the taxpayers nothing, it costs the boat owner nothing, the environmental impact is nothing, and until proven otherwise is effective. To state "people want to do the right thing but simply cannot" is simply not true. Most boats can be easily and effectively be decontaminated by the owner.
- No consideration is given to other means of decon such as implementation of public water access best management practices such as "Clean Drain Dry" areas

Strategies to address the problems

Strategy #1: Stop or at least slow the spread of AIS.

*Inspection and decontamination has the greatest **short-term** potential for stopping the spread of AIS. While **not ideal**, slowing the spread would still bring positive benefits; **buying time** for research and keeping the problem constrained awaiting more-effective solutions*

***Strict controls** on boat launches in other states have been effective in halting new AIS introduction into valued water resources in western states and in particular at Lake Tahoe.*

- 25 Million (and likely more) is a high price tag for a plan with "short term potential" and a plan that is by admission is "not ideal" in order to "buy time." What then is the ideal long term solution? What costs are associated with a viable long term solution?

- Strict control on boat launches will be a contentious issue. Comparison with western reservoirs and Lake Tahoe has limited applicability to Minnesota. Referenced is the “Final Report to Identify Options and Cost for Implementing Statewide Measures to Prevent the Spread of AIS”; Thompson Engineering; February 2012.. On page 8 -

“Unlike the western states where water bodies are isolated or are controlled reservoirs; Minnesota water ways are often connected through the major river systems or chains of lakes. An illustration of this is provided in Figures 3 and 4.

Note that Lake Tahoe is isolated from other water bodies and provides limited accesses so that prospective boaters can be inspected easily at roadside inspection sites. The Gull Lake Chain of lakes that is shown in figure 4 demonstrates the complexity of the topology of lakes in Minnesota”.

- In addition to the stated differences between western water bodies and MN most if not all of these do not encounter a winter frozen water season. Will the proposed inspection and decon stations be available immediately upon ice out all the way until freeze up which will vary widely across the state and between bodies of water in a given region?

Strategy #2: Deploy cost-effective inspection and decontamination models. Inspecting and decontaminating at 2,000 public landings is cost prohibitive, however current AIS statutes allow for more cost-effective shared services models (regional inspection) serving multiple lake or accesses. Our proposal will use a combination of dedicated “at the access” and shared “regional” inspection and decontamination stations

- Shared or regional decontamination stations must comply with state statutes. Specifically the provisions of 84D.105 (below). By statute LSOHC funding recommendations must comply with state law:

Minnesota Statutes, section 97A.056, subdivision 3, paragraph (a) provides, in part, that:

The council shall make recommendations to the legislature on appropriations of money from the outdoor heritage fund that are consistent with the Constitution and state law and that will achieve the outcomes of existing natural resource plans,

MN Statue 84D.105:

(g) The commissioner may authorize tribal and local governments that enter into a delegation agreement with the commissioner to conduct mandatory inspections of water-related equipment at specified locations within a defined area before a person places or removes water-related equipment into or out of a water body. Tribal and local governments that are authorized to conduct inspections under this paragraph must:

- (1) assume all legal, financial, and administrative responsibilities for implementing the mandatory inspections, alone or in agreement with other tribal or local governments;
- (2) employ inspectors that have been trained and authorized by the commissioner;
- (3) conduct inspections and decontamination measures in accordance with guidelines approved by the commissioner;

- (4) have decontamination equipment available at inspection stations or identify alternative decontamination equipment locations within a reasonable distance of the inspection station that can bring water-related equipment into compliance;
- (5) provide for inspection station locations that do not create traffic delays or public safety issues; and
- (6) submit a plan approved by the commissioner according to paragraph (h).
- (h) Plans required under paragraph
- (g) must address:
- (1) no reduction in capacity or hours of operation of public accesses and fees that do not discourage or limit use;
 - (2) reasonable travel times between public accesses and inspection stations;
 - (3) adequate staffing to minimize wait times and provide adequate hours of operation at inspection stations and public accesses;
 - (4) adequate enforcement capacity;
 - (5) measures to address inspections of water-related equipment at public water accesses for commercial entities and private riparian land owners; and
 - (6) other elements as required by the commissioner to ensure statewide consistency, appropriate inspection and decontamination protocols, and protection of the state's resources, public safety, and access to public waters.
- (i) A government unit authorized to conduct inspections under this subdivision must submit an annual report to the commissioner summarizing the results and issues related to implementing the inspection program.
- (j) The commissioner may waive the plan requirement in paragraph (g) for inspection programs where authorized inspectors are placed directly at one or more water access sites, with no requirement for a person to travel from the water access for inspection or decontamination, and no local ordinance or other regulation requiring a mandatory inspection before placing watercraft or water-related equipment into a water body or after watercraft or water-related equipment are removed from a water body.

- This proposal does not specifically address how it will be in compliance with statute 84D.105. Strategy #2 as stated is vague. The LSOHC should be given a specific and detailed draft plan of implementation that could be approved by the Commissioner. Authorization of a mandatory inspection and decontamination program without approval of the DNR Commissioner would clearly be a violation of state law.
- Minnesota has over 2000 public water access sites. In addition to the public sites there are an almost equal number (per Thompson Engineering report) of private and 100s more undocumented sites around the state. Another factor in addition to the large number of public and private access is the numerous agencies who administer these sites: City, township, county, state, federal (NFS, NPS, FWS, Corp of Eng, BIA). To what extent can the state regulate federally administered public water access sites might be a question to address by legal analysis. Can a state require the federal government to provide inspection and decontamination facilities or inspectors at public water access sites they administer? Can the state regulate their hours of operation and mandate enforcement? Regulatory activities at federally administered sites might need approval from federal agencies and some, such as Voyageurs National Park, may require action by the US Congress. Enforcement at public and private water access sites will be difficult to impossible. CO s and local law enforcement, whose resources are already stretched thin, will now be asked to enforce "public

access violators” To what extent will this become an enforcement priority with time?

- Restricting public water access sites will increase use of private water access sites and undocumented access sites. Much like regulating the federal government the state might be limited in what can be done at private sites. This is not limited to the ‘pay to launch sites’ or resorts - this also includes private landowners launching their own boat (or friends and neighbors) from their own land. Finally use of undocumented sites will increase environmental damage – erosion, rutting, etc. These sites will have no regulation and will become the prime cause of AIS spread.
- If inspection and decontamination of watercraft is required it must apply to all water craft including canoes, kayaks, and waterfowl boats. Waterfowl boats in particular must be required to have inspection and decontamination. Feedback should be solicited from waterfowl and hunting organizations to make sure they are in agreement to have all waterfowl boats inspected and decontaminated prior to launch.
- Lake shore property owners must be required to “do their part” by having their boats inspected and decontaminated prior to launch even if it will be seasonal launch. If you have a boat trailer registered you need to inspect and decontaminate your boat prior to launch – no exceptions. Has MN COLA membership been surveyed to make sure they agree and will support all trailered boats – even seasonal launching into the same body of water - being required to have mandated inspection and decontamination? Must be able to somehow prove the trailered boat was only in one body of water.

Strategy #3: Widely deploy decontamination capabilities.

Commissioner Landwehr’s focus on personal responsibility becomes a reality with available and convenient decontamination stations. Our proposal would increase decontamination units from 20 today to over 177 statewide.

- Will this be in compliance with MN Statute 84D.105? Strategy as stated is ambiguous – decontamination or inspection? Will decontamination be required regardless of risk or just inspection if warranted. Seems to imply unilateral decontamination as opposed to inspection and decon only if warranted.
- Lake and river density and level of use age varies considerably throughout the state. More detail is needed as to the location of these inspection and decontamination stations. Parts of the state such as southwestern MN and northwestern MN have considerable distance between some bodies of water. How far will boaters in NW and SW MN need to travel for regional inspect and decon? Does this comply with MN Statute 84D.105? Where will waterfowl hunters in Swift County need to travel for inspection and decontamination? What is the anticipated usage of inspection and decontamination stations in sparsely populated areas of the state with a low density of water access sites – will the level of usage relative to the risk justify the cost? Will seasonal stations be setup to serve waterfowl hunters in remote areas of the state. Would this be

consistent with the requirements of MN Statute 84D.105? Similarly will inspection and decon stations be convenient for tribal wild rice harvesting activities.

- Many residents live near but on lakes and rivers. For example: A resident in Hubbard County lives ¼ mile from the public water access to Upper Bottle Lake but does actually live on the lake. This resident, being just down the road, frequently goes fishing on UBL. How far will this resident need to travel in order to have mandatory inspection and decon before launching on UBL. Despite being ¼ mile down the road will this resident need to travel 15 or so miles into Park Rapids (30 mi round trip) in order to launch a few blocks from his home?
- Another example: A father and son are fishing on Lake Julia in Beltrami Cty. Fishing is slow they decide to pull up and try Big Turtle Lake. Will they need to drive all the way into Bemidji for inspection and decon even if the access at BTL is only a few miles down the road from the access at Lake Julia?
- Many boaters travel with their boats covered. To inspect and decon will require removal of the cover. This will cause serious inconvenience and delay.

Strategy #4: Leverage and enable local efforts.

Many local groups are ready to act, but virtually all are hampered by a lack of facilities and equipment. The following local groups can be leveraged through this proposal:

Local and Tribal Units of Government

Volunteers

Commercial interests

- Strategy #4 is vague. Commercial interests? Is this suggesting there will be a user fee to use public waters? If the taxpayers are funding a statewide AIS then no additional fee should apply for use of public waters. There is already an AIS surcharge.

Proposed solutions

Solution Component #1: Grant funds for up to 127 shared AIS inspection and decontamination stations.

This would enable local and tribal units of government, and the DNR to acquire the land, build-out, and equip regional AIS stations for inspections and decontamination. Deployment support would ensure consistency and success.

- See comments above for Strategy #3. As stated density and usage varies considerably throughout the state. Much more detail is needed on how the locations of inspections and decontamination stations will be in compliance with statute 84D.105. In sparsely populated areas of the state that are not 'vacation destinations' will projected usage and risk justify the cost? In some parts of the state you might be building and equipping facilities in order to be in compliance with 84D.105 that may see occasional or seasonal usage (waterfowl or wild ricing). The "decon station on the prairie" could quickly become the poster child for wasting taxpayer dollars.

Solution Component #2: Grant funds for equipping up to 50 dedicated AIS stations with decontamination equipment. These higher volume facilities already exist and many are owned by the DNR, but the majority does not have available decontamination units.

- How is proposed Solution Component #2 different than Solution Component #1? Clarification is need as to what is the difference between 'shared AIS inspection and decon' stations and 'dedicated' AIS stations'

Given the importance of AIS the proposed solutions seem narrowly focused on inspection and decontamination without consideration for alternatives. For example:

- No plan to address Asian carp – solutions seem focused on ZM and public water access
- **No plan for alternative more cost effective solutions if proposed solution cannot be realized (Funding inadequate, assumptions for additional funding not met, court rulings, etc)**. In essence a workable 'plan B' to meet the proposal objectives and protect the taxpayers investment**
 - Why not consider implementing public water access 'best practices' such as Boat Clean and Dry Areas at water access sites as detailed in MN DNR publication entitled "Aquatic Invasive Species Best Management Practices for Water Access" published 06/2012. This would easily and cost effectively address Problems 1, 2, and 3. Much of the work could be done by volunteers or other low cost groups – Boy Scout/Eagle Scout project, 'sentence to serve', MN Conservation Corp, etc. Sustaining costs would be low – only slightly higher than costs currently incurred by water access administrators, low cost to implement for private boat launch facilities (grants or tax incentives could be made available), likely a high rate of public acceptance/very little resistance to use

Expected Opposition

Opposition to inspection/decontamination procedures exists today and will grow with wider deployment. The opposition should fade in time.

- First the proposal, if recommended by the LSOHC, will need to pass the legislature. It is expected to be a contentious issue to spend 25 million dollars that will drastically change the way citizens access public waters. Especially true since 2014 will be an election year. The proposal is clearly not supported by Commissioner Landwehr. It is very true there will be intense public opposition and potential litigation in state and possibly federal courts.
- Anglers and outdoors people largely support AIS containment efforts and understand the risk that AIS pose. There are limits to what will be supported. This proposal will likely be viewed as too extreme and will likely be not supported by the majority of voting anglers and outdoor recreationists.

Accelerates or supplements current efforts

This proposal would accelerate inspection and decontamination activities at the local level, but those programs would still require supplemental funding sources.

- 25 million seriously underestimates the program costs. The previously referenced DNR consultants report estimated a plan similar to that proposed would cost between 59 million dollars ANNUALLY. Significantly more than the requested 25 million “start up” funds requested
- Have these supplemental funding sources been identified? Detailed cost estimates of what supplement funds will be needed to implement the plan need to be provided. What will the outcome be and how will the plan be implemented if the projected 25 million does not cover the cost and the supplemental funding does not become available? If indeed the cost of the plan is more than 25 million then cost estimates should be revised and full amount requested from the OHF. Essentially what is being done as asking the tax payers to fund part of a project with no guarantee the proposal will actually be funded and completed as proposed. (Analogy: My son asks for half a candy bar because he knows that’s what I’ll likely give him when really he wants the whole thing but is afraid to ask knowing he might not get it.) The LSHFCO, the legislature, and taxpayers should know what real cost of this proposal will be including sustaining costs.

We expect that DNR, Federal and other grant programs will continue. This proposed one-time funding would remove a significant barrier to a more complete program that protects our public waters for future generations.

- This is an assumption at best. For example: The Durand Township board awards a grant to the Beltrami SWCD to provide boat inspections on Lake Julia. Should the Beltrami County SWCD receive funds from the OHF to provide regionalized watercraft inspections what motivation does the Durand Township board have to continue funding watercraft inspections? The money could be better used for road improvements in the township. Local elected officials see the Outdoor Heritage Fund as an untapped pot of gold that will take funding for watercraft inspections off their hands. They would love nothing more than to get watercraft inspections out of their budgets and lakeshore property owners off their backs. If a SWCD comes to the county board and is asked to fund boat inspection programs the county board can simply state: “Why are you asking us for money – you have 25 million dollars to apply for?” It was reported the MN COLA received letters of support from some county boards (amongst others) when they presented this to the LSOHC. Of course county boards support this proposal ! – if I was county commissioner you better believe I would write a letter of support! Further, county boards/LGUs are ever leery of the clause in 84D.105 requiring LGUs to “assume all financial, legal, and administrative responsibilities in administering a mandatory inspection program” They could easily divorce themselves entirely from the watercraft inspection business – the DNR has the money now let them run the program.
- Are the projected outcomes of this funding request contingent upon current funding levels? If so the MN COLA should provide letters of commitment from all entities currently providing funding indicating they will continue funding at current levels.

- Project assumes in most cases nearly 100 or more 10 acre parcels of land will be available at supposedly ‘convenient locations’ – what if land is not available for in the desired locations? Have things like zoning, EIS, easements, road access and improvements (Will the state or LGU be responsible for providing improvements to the roadway?) – for example left during traffic, especially a boat and trailer will need dedicated left turn lane or passing lanes, permits, potential local opposition to having a ‘decon’ station and associated traffic in their backyard all been considered? Traffic engineering studies and likely capital improvements to the roadway will be needed to insure public safety.
 - Land acquisition and the preliminary work (EIS, engineering studies, etc) can be a lengthy and complex process – you might be out 3-5 years before a shovel even hits the dirt.

Sustainability and Maintenance

The two uses of these proposed funds have different sustainability and maintenance needs, as detailed below:

The grant recipients intending to acquire land and establish regional AIS inspection stations would be responsible for maintaining these AIS stations. Clearly defined maintenance approaches for a minimum of 5 years would be a requirement of their grant request. In case of default, we suggest the land be ceded to the State.

- In the event the 25 million does not cover the costs and other funding did not come through. A useless improved parcel of land to be cleaned up at taxpayer expense.

The decontamination assets are pieces of capital equipment with useful lives of 10-15 years. An equipment maintenance plan would be a requirement of their grant request. Depending on the AIS programs in effect, these assets might need to be replaced after their useful lives. In case of default, we suggest the equipment be repurposed or resold with proceeds going to the State.

- Repurposed for what? If the equipment has outlived its service life of what value is it?

The LGU’s need time to find funds for AIS and this 3-year deployment provides time to establish their funding sources. As to on-going reliance on volunteers and volunteer organizations for time and money, we know that Minnesotans care about our environment and our heritage, and will continue to fund efforts that are successful and cost effective. The vote to enact the Legacy Fund is demonstrable proof of our collective commitment.

- Like a man with 25 million dollars walking into a soup kitchen and asking for a meal and a car wash.
- Minnesotan’s voted for the Legacy Fund to have lands and water available for public use – not to be restricted from using them!

Outcomes

Programs in the northern forest region:

Our intended outcome is that we stop or at least slow the spread of man's actions in transferring AIS to uninfested waters. Our conclusive data, however, would lag the term of this proposal. All AIS infestations are unknown until they manifest themselves and/or are discernible through testing. For example, zebra mussels undergo a 3-year gestation period, thus it means that it will be another year to determine effectiveness in stopping their spread from 2011 efforts, 2 more years for 2012 actions, and 3 years for 2013 actions.

- Could the source of the conclusive data be referenced or the conclusive data be provided?

As local AIS protection programs are designed, it is vital to recognize that due to the flow of water between lakes, unprotected upstream waters compromise the intended outcomes of any downstream protected waters. Nonetheless, once this more comprehensive AIS prevention program is implemented for connected bodies of water, we would expect that no more than 10-15% of those water bodies will have a human transferred species of AIS introduced. There is some level of inherent error in every element of our proposed solution, but this more comprehensive solution of inspections and decontamination will dramatically reduce the risk of man's unintended spread of AIS.

- If even after implementation of this program AIS infestations continue to occur it was not because this program is ineffective. It is because they were pre existing and went undetected between connected bodies of water or through some other means than trailered boats. In other words you can never really measure the problem's ineffectiveness because there will always be "some other reason" infestations continued to occur.
- Is the admission here that infestations can and do occur by some other means than boats? The working model for this funding request is that humans are primary means of AIS spread. What other means are possible? What aspect of this program will address those possible "other means" – Asian carp swimming upstream for example.
- The interpretation of this statement is unclear: "once this more comprehensive AIS prevention program is implemented for connected bodies of water, we would expect that no more than 10-15% of those water bodies will have a human transferred AIS introduced" Is the interpretation here that of all the connected bodies of water in Minnesota if 10-15% of those continue to become infested by human transferred AIS this is within the acceptable outcome of the program. What modeling or data was used to determine this?
 - Is the understanding here this proposal will only be effective for bodies of water that are unconnected?

In summation there really is no outcome measure that can verify the success of this, as stated in "Strategy #1" - 'short term' solution, proposal since MN COLA admits that despite spending 25 million (and most likely more) AIS spread will continue especially in

connected waters. Basically if the program fails a handy excuse has already been built in to the outcome measures: "It was already there and went undetected, it spread through connected waters, or it must have come in from some other means than trailered boats"

We recommend that the MN DNR begin tracking effectiveness of the local AIS programs, and specifically linking infestations to the completeness of the local AIS programs or lack thereof. Once the DNR has established a comprehensive reporting program, AIS prevention solutions implemented across the state can be better assessed.

- Actually the DNR is already required to this and has been since I believe 1991:

Each year, by January 15, the Department of Natural Resources (DNR) is required to prepare a report for the Legislature that summarizes the status of management efforts for invasive species (aquatic plants and wild animals) under its jurisdiction. Minnesota Statutes, Chapter 84D.02, Subd. 6, specify the type of information this report must include: expenditures, progress in, and the effectiveness of management activities conducted in the state, including educational efforts and watercraft inspections, information on the participation of others in control efforts, and an assessment of future management needs. Additional sections have been added to this report to provide a thorough account of DNR's Invasive Species Program activities and other activities related to invasive species of aquatic plants and wild animals.

I wish to thank the members of the Lessard-Sams Outdoor Heritage Council for their careful review and consideration of my comments.

Respectfully,

Mark Kapphahn
Forest Lake, MN

cc. AIS Advisory Committee