## DEPARTMENT OF NATURAL RESOURCES

500 Lafayette Road St. Paul, MN 55155

December 08, 2021

Jeffrey Hathaway Twin Cities Hydro LLC 965 S. Mississippi River Blvd. Saint Paul, MN 55116

Re: Twin Cities Hydroelectric Project (P-362-008) Review Copy of 2021 Zebra Mussel Annual Report

Dear Mr. Hathaway,

Thank you for the opportunity to review and comment on the 2021 Zebra Mussel Annual Report. The DNR has the following comments for your consideration.

The report should be considered as a minimal effort to monitor for zebra mussels, and while it may address the 2005 Zebra Mussel Monitoring and Control Plan, it contains minimal information on this invasive species.

Monitoring appears to be confined to "routine" communication with Army Corps of Engineers staff in nearby lock and dams on zebra mussel occurrence, inspections during scheduled dewatering activities and one concrete block suspended in the water. There are no details on the frequency or timing of the dewatering activities, so it is difficult to determine how useful these inspections may be. While a concrete block is used, the photographs show this from a distance, and it is unclear if the inspections are detailed enough to document small, early settled mussels which may occur in such areas as the inside corners of the block cutouts. No zebra mussels were visible in the pictures, but from the photographs, no zebra mussels would be seen unless there was significant, high density settlement of large mussels. I do not have the 2005 Monitoring Plan, so cannot say if these activities meet the standards set out in this plan. This report should be considered as a minimal effort survey for zebra mussels. While it may be accepted, in my assessment it represents a low level effort in monitoring.

We appreciate the opportunity to review this report. Please contact me if you have any questions regarding this review.

Sincerely,

Sara Mielke Project Manager

Equal Opportunity Employer