



Friends of Minnesota Scientific & Natural Areas

September 25, 2019

Commissioner Sarah Strommen
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Re: Expedited Emergency Game and Fish Rules: 2019 Deer Seasons and Special Hunts
Pin Oak Prairie, Cherry Grove Blind Valley, and south unit of Mound Prairie SNAs
State Register – August 26, 2019

The Friends of Minnesota Scientific and Natural Areas (FMSNA) recently became aware of the Emergency Rule opening three SNAs (Pin Oak Prairie, Cherry Grove Blind Valley, and the southern unit of Mound Prairie SNAs) to deer hunting, areas where Chronic Wasting Disease (CWD) Management Zones were established in southeastern Minnesota. Although not normally open to public hunting, deer hunting on these SNAs "... decreases the possibility that deer will become concentrated in these areas to avoid hunters. This increases the likelihood of achieving the overall goal of reducing the risk of CWD transmission between wild deer." [44 State Register 249, August 26, 2019.]

FMSNA supports opening SNAs to deer hunting in CWD zones until such time as CWD is no longer present in those areas. We support this in recognition that CWD has the potential to seriously limit our ability to control deer populations should CWD further impact the number of people hunting deer. As you are aware, high deer numbers can have tremendous negative impacts on native plant species and communities. As SNAs support a disproportionate number of rare plant species and outstanding natural communities (compared to other public and private lands), we can't take the chance that they will be impacted by higher deer populations.

Thank you for acting quickly on this serious wildlife disease dilemma.

Very truly yours,

Thomas E. Casey

Thomas E. Casey, Board Chair
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