Friends of Minnesota
Scientific & Natural Areas

December 11, 2023

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

Via Hand Delivery and Certified Mail

Re: Please Remove Incompatible Uses on Proposed SNAs

Dear Commissioner Strommen,

Friends of Minnesota Scientific and Natural Areas would first like to compliment the Minnesota Department of Natural Resources (DNR) for the progress to attain the long-range goals for Scientific and Natural Areas (SNAs) across Minnesota. Acquiring and moving forward to designate 914 acres is a positive step.

However, we note that, although the DNR has closed on the acquisition of 13 SNAs (totaling 914 acres), all of them are awaiting a Commissioner's Designation Order (CDO). Your signature of the CDOs will make these parcels an official and legal Scientific and Natural Area and receive all of the protections the SNA statutes and rules provide. Furthermore, this will be a significant step towards reducing the 11,369-acre shortfall from the 2014 SNA Strategic Land Protection Plan's goal of designating "… an average (mean) of 1,600 additional acres of SNA per year." [If no SNA acres are designated in 2023, the shortfall will increase to 12,969 acres.]

In addition, the language of each CDO memorializes protections and uses. We note that the DNR has proposed incompatible uses - such as dogs, berry-picking, picnicking, and undefined hunting – on some of these pending SNAs awaiting a CDO.

Therefore, we respectfully request that all of your CDOs contain the following language, consistent with many of the existing CDOs, such as Crystal Springs SNA (published February 8, 2016):

> "FURTHERMORE, the _____ Scientific and Natural Area is designated as a Public Use unit, open to the public for nature observation and general educational and research activities.
>
> "IT IS FURTHER ORDERED that the provisions of Minnesota Rules 6136.010 through 6136.0600 shall apply to the above designated are except that the

> Commissioner may decide to allow hunting if and when documented ecological needs arise that can best be resolved by hunting with such limitations as the Commissioner determines are necessary for protection of the values for which the site was designated."

We also respectfully request that all of the new CDOs, where hunting is allowed, contain the non-toxic ammunition requirements, as stated in your June 27, 2023 "Commissioner's Order Amending the Commissioner's Designation Order for 56 Scientific and Natural Areas to Require Non-Toxic Ammunition ..."

We also note that the DNR's Natural Heritage Advisory Committee (NHAC) adopted virtually the same recommendations in the CDO quoted above, in a letter to you dated June 5, 2020:

> "Our default position is to allow only those uses allowed in the statute, as follows: For nature observation and general education and research activities; and/or allow activities that are intended to preserve the value of the SNA, such as hunting to manage deer populations.

Furthermore, the Commissioner's Advisory Committee on Natural Heritage (CAC) advocated for non-toxic ammunition on all SNAs as far back as a letter to the DNR dated August 25, 2016, which states in part:

> "… CAC also strongly urges the Department to allow only non-toxic ammunition on all SNAs."

**We look forward to your reply** – and to working with the DNR and Minnesota citizens to protect and enhance Minnesota's Scientific and Natural Areas, the "crown jewels" of Minnesota's state land base.

**Thank you** for your kind consideration.

Very truly yours,

*Thomas E. Casey*

Thomas E. Casey
Board Chair
Friends of Minnesota Scientific and Natural Areas, Inc.

Please send correspondence to:
2854 Cambridge Lane
Mound, MN 55364
telephone: (952) 472-1099
e-mail: tcasey@frontiernet.net

cc: Board of Directors