October 5, 2019

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



Re: Minnesota Herpetological Society Supports Petition for Adoption of Rules Prohibiting Lead Fishing Tackle and Lead Ammunition Submitted by Friends of Minnesota Scientific and Natural Areas (September 3, 2019)

Dear Commissioner Strommen,

The Minnesota Herpetological Society (MHS) is a Minnesota non-profit organization, formed in part to promote the conservation and preservation of reptiles and amphibians.

MHS submits this letter in support of a Petition for Adoption of Rules Prohibiting Lead Fishing Tackle and Lead Ammunition, filed on September 3, 2019 by Friends of Minnesota Scientific and Natural Areas. To ensure the ecosystem health we need to remove lead from the environment as soon as possible and wherever possible. Non-toxic tackle and non-toxic ammunition are already available and are reasonably priced.

Specifically, MHS is worried about the impacts fishing tackle can have on Minnesota's turtles. A recent study in the southeast U.S. has found that approximately 1/3 of turtles X-rayed had ingested fishing tackle within their gastrointestinal tracks (Steen et al. 2014). A follow up study estimates that fishing tackle could cause unsustainable levels of mortality (Steen et al. 2017). This is alarming, especially given that turtles are among the most imperiled vertebrates on Earth.

MHS thanks you in advance for adopting rules that adequately protect ecosystem health.

Sincerely yours,

Laura Windels

President - Minnesota Herpetological Society

President@mnherpsoc.org

Literature Cited:

Steen, D. A., Hopkins, B. C., Van Dyke, J. U., & Hopkins, W. A. (2014). Prevalence of ingested fish hooks in freshwater turtles from five rivers in the southeastern United States. *PloS one*, *9*(3), e91368.

Steen, D. A., & Robinson Jr, O. J. (2017). Estimating freshwater turtle mortality rates and population declines following hook ingestion. *Conservation biology*, *31*(6), 1333-1339.