



Friends of Minnesota Scientific & Natural Areas

October 12, 2017

Public Comments Processing
Attn: FWS–HQ–MB–2017–0028
Division of Policy, Performance, and Management Programs
U.S. Fish and Wildlife Service, MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041

Re: Proposal to open a hunting season on Trumpeter and Tundra Swans in the Atlantic, Central, and Mississippi Flyways, which includes Minnesota
Docket No. FWS–HQ–MB–2017–0028

To Whom It May Concern:

On behalf of Friends of Minnesota Scientific and Natural Areas, I submit this letter in response to the USFWS proposal to open a hunting season on trumpeter and tundra swans in the Atlantic, Central, and Mississippi Flyways, which includes Minnesota. (Federal Register, August 3, 2017, page 36315.)

Friends of Minnesota Scientific and Natural Areas (FMSNA) is a Minnesota non-profit, tax-exempt [“501(c)(3)”] corporation whose mission is to advocate for the protection, management, and perpetuation of Minnesota’s Scientific and Natural Areas (SNAs) in an undisturbed natural state. (It is important to note that our mission is entirely consistent with the SNA program’s statutory purpose, as stated in Minn. Stat. 86A.05, Subd. 5.)

Consistent with our mission and Minnesota statutes, FMSNA supports hunting on SNAs only if a scientifically documented ecological issue arises and there is a sound biological basis for concluding that there is no “feasible and prudent alternative” other than by resolving the issue by this method (e.g. controlling deer over-browsing).

Accordingly, **we strongly oppose the USFWS proposal to open a hunting season on trumpeter swans and tundra swans in the Mississippi Flyway**, which includes Minnesota’s SNAs. There is no demonstrated ecological basis for allowing the killing of trumpeter or tundra swans – either on or off Minnesota’s SNAs. Some populations of trumpeter swans and tundra swans are found in the vicinity of/or even on Minnesota’s SNAs. As such, elimination or losses to such populations may prevent trumpeter swans from ever occupying available habitat in those SNAs.

The Draft Environmental Assessment (June, 2017) provides no justification for opening a trumpeter swan season, except to acknowledge that some hunters will mistakenly kill trumpeter swans claiming they thought they were tundra swans, and so give them license to do so.

Any hunting season for tundra swans in the Mississippi flyway would also result in the killing of countless numbers of trumpeter swans. Even today, some tundra and trumpeter swans are mistakenly killed by goose hunters, who can't identify swans from the much smaller snow goose. A hunting season would jeopardize the continuing repopulation of the trumpeter swan in this state and the surrounding states.

Minnesota has spent hundreds of thousands of dollars, primarily from the Nongame Wildlife fund, to reintroduce the trumpeter swan. These funds were donated by citizens of this state and elsewhere who wanted to see this species of swan as a nongame species. They wanted to give the trumpeter swan a chance to once again occupy its original range, as a nongame species. Thanks to the many donations and work of volunteers and professional managers, trumpeter swans once again can be seen in a number of locations where they were originally found. However, trumpeter swans do not occupy anywhere near all of their original habitat, nor are their numbers anywhere near where they once were.

Waterfowl hunting in Minnesota has declined dramatically over the past fifteen years, while, at the same time, watching wildlife has greatly expanded. This trend extends across the nation. We seriously question if there is any demand in the Mississippi Flyway and Minnesota to in fact shoot tundra swans. Minnesota has never had a history of shooting swans, much less trumpeter swans. However, photographing or viewing swans at the Weaver Bottoms or on local wetlands is a major watchable wildlife activity in Minnesota that exceeds the number of waterfowl hunters in this state. Minnesota is a destination state when it comes to where to go to photograph and view trumpeter swans. Numerous communities, from the metropolitan area to northwestern Minnesota, have major concentrations of trumpeters, which attract tourists who boost the local economies.

The Draft Environmental Assessment (June, 2017) fails to even acknowledge the important economic as well as political consequences for states in the Mississippi Flyway, where the emphasis has been on restoration of breeding and migratory trumpeter swan flocks as a protected nongame species. Any hunting season on swans in the Mississippi Flyway will result in the dramatic loss of funds from donors to the Minnesota Nongame check-off. This will greatly reduce conservation efforts for other nongame species and even curtail efforts for some due to a lack of funding. In addition, public trust in the Minnesota Department of Natural resources will decline; the public will view hunting swans as the real reason Minnesota embarked on its reintroduction over 35 years ago. The same can be said for other states in the Mississippi Flyway, where re-establishing the trumpeter swan was initiated as a nongame species, where hunting was not the objective.

Given Minnesota's successful role in the restoration efforts for trumpeter swans, a disproportionate number of trumpeter swans would be shot versus tundra swans, if a "swan season" is approved in the Mississippi Flyway. Trumpeter swans spend greater time in Minnesota in the fall than tundra swans. A swan hunting season would greatly depress local

USFWS
October 12, 2017

trumpeter swan populations, as opposed to the tundra swan. This would set back statewide trumpeter swan restoration efforts by many years.

In summary, we **strongly oppose a swan hunting season in the Mississippi Flyway**. We also request that Mississippi Flyway be deleted from the final Environmental Assessment (EA) and that the USFWS refrain from any further discussion about opening this flyway to swan hunting.

A new alternative should be developed in the EA that pertains only to the Central and Atlantic Flyways. In these flyways, accidental taking of trumpeter swans by hunters, who are licensed and permitted to take tundra swans, shall have the trumpeter swans confiscated – and the hunter ticketed or fined. Hunters have the responsibility to know their target species.

Please contact me if you have any questions or comments. When available, please forward a copy of the final rule and the public comments to the below e-mail address.

On behalf of Friends of Minnesota Scientific and Natural Areas, I thank you in advance in anticipation of your kind consideration

Sincerely yours,

Thomas E. Casey

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

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

cc: Mr. Jason Abraham, DNR Division of Fish and Wildlife (via e-mail only)
Mr. Luke Skinner, Director, DNR Ecological and Water Resources Division (via e-mail only)
Mr. Carrol Henderson, Supervisor, DNR Nongame Wildlife Program (via e-mail only)
Board of Directors - FMSNA