

Friends of Minnesota Scientific and Natural Areas

A Minnesota Non-profit, Tax-Exempt Corporation
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March 28, 2016

Peggy Booth
SNA Program Supervisor
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

VIA E-MAIL AND U.S. MAIL
peggy.booth@state.mn.us

Re: Proposed SNAs – Agassiz Dunes; Iron Springs Bog; Icelandic Fen; River Warren Outcrops;
and Uncas Dunes

Dear Peggy,

On behalf of Friends of Minnesota Scientific and Natural Areas (FMSNA), I offer the following comments to the proposed SNAs stated above:

1. **Agassiz Dunes SNA, School Trust Addition** (Polk County): The new Commissioner's Designation Order should maintain the same uses as Commissioner's Order #190, i.e. "... open to the public for nature observation and general education and research activities."

2. **Iron Springs Bog, Shapiro Addition** (Clearwater County; 16 acres): The new Commissioner's Designation Order should be amended to prohibit hunting and trapping, except if a documented ecological need arises and there is no feasible and prudent alternative consistent with purpose of the SNA program as defined by statute: "... to protect and perpetuate in an undisturbed natural state those natural features ..." There is no discernible management objective to allow trout fishing.

3. **Icelandic Fen** (Cook County; 30 acres): The Commissioner's Designation Order should prohibit hunting and trapping, except if a documented ecological need arises and there is no feasible and prudent alternative consistent with purpose of the SNA program. FMSNA requests that the existing foot trail be effectively monitored to protect the sensitive boreal fen and the endangered Auricled Twayblade (*Listera auriculata*). The adjoining Parks and Trails properties should contain interpretative signs to alert trail users of the SNA's sensitive features.

4. **River Warren Outcrops** (Renville County): As stated in paragraph 3 of our March 11, 2015 letter, the "negotiated Reserved Easement is not sufficient to protect the site." After subsequent review of the "Declarations of Easements, Covenants, Conditions and Restrictions" (attached to the signed purchase agreement), I note in paragraph 5 that the trails "... may only be used for recreational horse traffic." [Emphasis added] Although the paragraph does not specifically prohibit foot traffic on the trail, neither does the document allow it. Paragraph 6 exacerbates the problem by stating, "... this easement shall be open to public horse riding from May 15th to October 15th of any calendar year. **No use of the easement may be made during**

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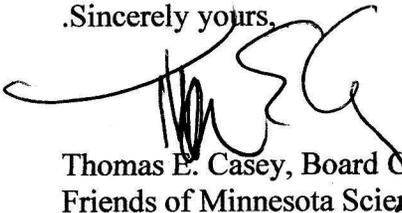
any other time of the year.” [Emphasis added.] The result of this language is people on foot or cross-country skis will be blocked from crossing the SNA.

Finally, we ask that you forward a copy of the “Current Work Program with LCCMR Approval letter”, referenced in the Grant Agreement as “Attachment A.”

5. Uncas Dunes, Tax Forfeit Addition (Sherburne County; 2 acres): The new Commissioner’s Designation Order should be amended to prohibit hunting, except if a documented ecological need arises and there is no feasible and prudent alternative consistent with purpose of the SNA program. Furthermore, there is no discernible management objective to allow dogs, as the present Commissioner’s Order allows. Dogs should not be permitted in the SNA.

Thank you for your kind attention and reply.

.Sincerely yours,



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

cc: Tom Landwehr, DNR Commissioner
Luke Skinner, Director, Division of Ecological and Water Resources
Board of Directors - FOMSNA