

From: [Jennifer Bourbonais](#)
To: [Michelle Claviter-Tveit](#); [Angela Lepak](#)
Cc: [Matthew Johnson](#); [Chandra Kreidler](#)
Subject: FW: CWD
Date: Monday, July 11, 2022 8:35:04 AM

Michelle/Angie,

For the file please. Thanks.

-----Original Message-----

From: Matthew Johnson <JohnsonM12@StLouisCountyMN.gov>
Sent: Wednesday, July 6, 2022 1:54 PM
To: Jennifer Bourbonais <BourbonaisJ@StLouisCountyMN.gov>; Chandra Kreidler <KreidlerC@StLouisCountyMN.gov>
Subject: FW: CWD

Please save this CWD email in our file as a comment received. Thanks.

Matt

-----Original Message-----

From: dkrirish@mchsi.com <dkrirish@mchsi.com>
Sent: Wednesday, July 6, 2022 1:26 PM
To: Matthew Johnson <JohnsonM12@StLouisCountyMN.gov>
Subject: CWD

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Hi Matt,

I attached a link related to a Wisconsin Deer Farm and the studies they are currently doing in search of a cure for cwd. These type of studies could not be taken place in MN because of the current laws related to Deer Farmers. I believe we need to all be working together with the Farmers and the DNR in search of a solution.

It was good talking to you today.

If you have any problems opening the attachment please let me know.

Thank You,

Dale Irish-Region 3 Director of the MM Deer Hunters Association

<https://www.youtube.com/watch?v=qJH4kWi9ARg>

FOND DU LAC BAND OF LAKE SUPERIOR CHIPPEWA RESERVATION BUSINESS COMMITTEE LEGAL AFFAIRS OFFICE



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July 11, 2022

Jenny Bourbonais
St. Louis County Land Use Manager
Government Services Center
201 South 3rd Avenue West
Virginia, MN 55792

**RE: St. Louis County Zoning Ordinance 62 Proposed
Amendments – Chronic Wasting Disease**

Dear Ms. Bourbonais:

Thank you for the opportunity to provide written testimony to the Planning Commission regarding amendments to Zoning Ordinance 62 that would prohibit new cervid farms or the expansion of existing cervid farms in St. Louis County. The Fond du Lac Band submits this letter in favor of the ordinance amendments in order to protect our wild deer herd. A healthy wild deer herd is of critical importance to the culture, health, and economic wellbeing of all St. Louis County residents and has a unique role to the culture and subsistence of tribal members.

CWD is a prion-based disease that is terminally fatal to all Cervidae who contract the prion. CWD infects cervids via the transmission of prions, abnormal self-replicating proteins, that cause spongy degeneration in the brain. There is no cure or treatment for CWD and it is always fatal. CWD often spreads via contact with an infected cervid's bodily fluids (including saliva, urine and feces) although research suggests that it can spread via environmental vectors as well. For example, deer may become infected by consuming water, plants, or soil contaminated with CWD prions. CWD prions are extremely stable and have been shown to remain infectious in the environment for years. The only known way to destroy infectious prions is through sustained heat for several hours at extremely high temperatures (900°F and above).

Studies show that once CWD infects more than one-third of the population in a region, entire herds may be lost or impacted. The spread of the disease presents an immediate threat to our state's wild cervids and could lead to the loss of healthy cervid populations throughout the state; thereby harming rural communities, hunters, tribes, economic development that is dependent on the hunting industry, and all Minnesota citizens who rely on and appreciate wild cervids on the landscape.

Unfortunately, captive cervid farms can act as an incubator and vector for the spread of CWD. Increasing evidence shows that the disease is spreading between captive cervids facilities and the wild cervid population. Concentrating deer and elk in captivity increases the likelihood of direct and indirect transmission. This can occur through the transportation of cervids, cervid carcasses, or biological materials from unknown but infected cervid farms to non-infected cervid farms; or from the consumption of prion-contaminated water, soil, or food that can spread into or out of fence lines. There is no approved live field test for CWD. Therefore, absent clinical signs of the disease, which often don't show up for years after the initial infection, it makes it near impossible for farmers or veterinarians to know if a cervid is infected with CWD before moving it to a new facility.

Concerns of CWD spreading from farmed cervids to wild cervids were recently heightened by an outbreak on a Beltrami County farm and the illegal dumping of CWD positive carcasses in an open field by that farmer. That farm, and the illegal dumping site, are located approximately 100 miles from St. Louis County. In addition, a February joint report from the DNR and Board of Animal Health highlighted a number of deficiencies found during inspections of Cervid farms from the end of August to December 2021, including: 10 farms with inadequate fencing; 2 farms with inadequate redundant gating; 2 herd owners' failure to submit death reports within the required timeline; and 1 herd owner's failure to submit samples for CWD testing.

In addition, the DNR staff noticed a number of factors during inspections that could lead to the interaction of farmed and wild deer at fence lines, which is a potential risk for the spread of CWD. The DNR found good deer cover or habitat at the fence line on 35 farms; close or direct contact potential between farmed and wild deer on 22 farms (evidence included feces, rubs/scrapes, tracks, and wild deer sightings in the vicinity of the fence); at least one water, feed, or mineral station within 10 feet of the perimeter fence on 23 farms; and 17 farms with at least one feeder within 10 feet of the fence. The report demonstrates that wild and farmed deer have the potential to interact at fence lines and spread CWD via direct contact or through environmental vectors.

Most recently, the risk that captive cervid facilities pose to the general public was illustrated when two pregnant elk escaped from a new and *unlicensed* cervid facility in Carlton County. The Board of Animal Health had already directed the farmer to *not* place any cervids on the premises due to inadequate fencing. Despite this, the

farmer transported four pregnant cow elk to the facility from a farm near Montgomery, Minnesota, a region prevalent with CWD and within or close to a DNR CWD control zone. The next day two pregnant elk escaped due to the fencing deficiencies. Although one of the pregnant elks and its new calf were captured and tested negative for CWD, the other pregnant elk, potentially with a month-old calf in tow, is still at large in the area and it is unknown whether either are infected with CWD.

As the number of CWD infections in captive facilities continues to increase, the risk to the wild deer also increases. Studies on the population-level effects of CWD in deer have suggested that high prevalence can lead to a decline in white-tailed deer populations. Furthermore, because there are human health concerns related to the consumption of CWD-infected animals, the disease is also likely to lead to a reduction in hunter recruitment among tribal and non-tribal hunters.

Without changes in law and policy, our current approach to CWD perpetuates harm to the sustainable economies and overall health of Minnesota. That is why it's important for leaders at the County level to step up and adopt ordinances that will protect the state's wild cervid population. The Band understands that this measure may impact local individuals and businesses and does not take this position lightly. However, that does not change the reality on the ground. CWD is a dangerous disease spreading rapidly in our state. It is important that we take preventative measures now to stop the spread of the disease.

The Band thanks the Planning Commission for allowing us to submit this testimony, and we look forward to our continued partnership with the County to protect our shared cervid resources.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Allison Mitchell', with a stylized flourish at the end.

Allison J. Mitchell
Staff Attorney