DEPARTMENT OF NATURAL RESOURCES

Becca Nash
Commission Staff Director
Legislative-Citizen Commission on Minnesota Resources
Centennial Office Building, 1st Floor
658 Cedar Street
St. Paul, MN 55155

August 27, 2025

Greetings Ms. Nash,

We are writing in response to testimony written by Tiffany Wolf (UMN-MNPRO) and distributed to the LCCMR committee shortly prior to the scheduled hearing on Friday, July 18th. Accusations of misconduct were made against the Minnesota Department of Natural Resources, and we lacked an opportunity to respond to these concerns prior to final funding decisions for FY26 proposals. We believe it remains vitally important to address these issues and ensure to LCCMR members that we feel DNR acted appropriately, with no potential conflict of interest.

Minnesota DNR is fortunate to have staff that are subject matter experts on many conservation topics. Members of our Wildlife Health Program have decades of direct work experience with chronic wasting disease (CWD) surveillance and management in Minnesota and other states and are actively engaged in CWD-related research with numerous partnerships across the country. As such, when a LCCMR committee member requested program staff provide a brief review of a CWD-related proposal, specifically on how the proposed objectives relate to furthering disease management, this was not perceived by DNR to be an inappropriate request (Appendix A). The feedback staff provided was limited in scope to the specific objectives outlined in the MNPRO Proposal "United in responding to CWD in MN" and was both professional and appropriate (Appendix B). Further, it was at the request of the LCCMR member that the DNR comments be shared with other citizen members, actions that we understood to be allowable and at the discretion of members. There was no misinformation regarding CWD shared by DNR; however, our staff may have differing opinions on what is needed to further the science of CWD and create tools that wildlife managers can utilize in the fight against this disease.

Lastly, we feel the testimony submitted by Dr. Wolf went beyond the context of the comments submitted by DNR staff regarding her proposal and presented inaccuracies around our interest and collaboration. None of the DNR staff involved in providing comment on the MNPRO proposed project had a proposal in the FY26 solicitation for LCCMR funding.

I have since personally met with Dr. Wolf and DNR's Wildlife Health Program staff to clarify the need to maintain positive working relationships to ensure success in our management of CWD. We have a mutual interest in protecting Minnesota's deer populations and I am confident we can continue our respectful partnership in this shared endeavor. Thank you for the opportunity to address this issue and clarify inaccuracies conveyed in the written testimony.

If you have further questions or concerns, please do not hesitate to contact me. Thanks to you and the entire LCCMR for the work you do to maintain and enhance Minnesota's natural resources.

Sincerely,

Dr. Kelly Straka
Director, MN Department of Natural Resources, Division of Fish and Wildlife

CC: Tiffany Wolf, MNPRO, University of Minnesota

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Appendix A: Email from an LCCMR member to DNR staff to request expert review of a proposal.

From: Seth Moore <samoore@boreal.org>
Sent: Thursday, June 12, 2025 9:35 AM
To: Carstensen, Michelle (DNR) <michelle.carstensen@state.mn.us>
Subject: UMN CWD proposal

Can you give me some feedback on this proposal? I am supportive of the tribal surveillance, but very unsure of the rest and the total price tag. I have concerns about potential COI as well as overall investment in CWD. We have put about $9 million into their work thus far and I am not sure that other than detection at atomic levels, anything is being done to manage the disease or develop products that may help to address it.

Happy to chat about it.

Seth

Seth Moore, PhD
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Appendix B: DNR staff comments provided to the LCCMR committee member on the proposed project

From: Seth Moore <samoore@boreal.org>
Sent: Tuesday, June 24, 2025 12:48 PM
To: Hildebrand, Erik (DNR) <erik.hildebrand@state.mn.us>
Cc: Wood, Mary (She/Her/Hers) (DNR) <Mary.Wood@state.mn.us>; Carstensen, Michelle (DNR) <michelle.carstensen@state.mn.us>
Subject: Re: LCCMR Proposal comments

Michelle, Erik, and Mary,

First, thank you for this thoughtful analysis. I feel that these are significant concerns, in particular, those around conflict of interest. Do you mind if I share this note with my fellow citizen commissioners?

Seth

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On Tue, Jun 24, 2025 at 8:34 AM Hildebrand, Erik (DNR) <erik.hildebrand@state.mn.us> wrote:

Hi Seth,

Michelle is over in Sweden at the moose conference right now and asked that Mary and I help give some of our feedback/perspectives on the LCCMR proposal from UMN's MNPRO team and CWD funding request. Below are a few bulleted points.

- A big concern with the proposal is the effort to work on decentralizing CWD testing by funding the development of field-testing methodologies from a private for-profit company that will bypass national surveillance efforts. Micro-QuIC and MN-QuIC are non-validated testing platforms that are only available through Priogen – a private for-profit company. CWD is a program disease similar to bovine tuberculosis and bovine brucellosis. A critical component of national efforts to manage these diseases is consistency in test methodology to ensure results are comparable nationwide. Program diseases must be tested by approved laboratories through the National Animal Health Laboratory Network to ensure laboratories conducting testing meet rigorous laboratory standards and quality control methods, pass regular proficiency tests, and are reporting test results to regulatory agencies. This allows regulatory agencies to monitor diseases at many levels and ensures that test results are accurate and consistent across laboratories. This is critical for agencies to be able to utilize results to make difficult management decisions such as quarantine, depopulation, changing harvest, or implementing culling.
    - Development of new diagnostic tests is an important component of national surveillance and management programs, but new tests need to be validated through the USDA and implemented in the NAHLN program for official surveillance use. This proposal seems to advocate for decentralization of testing that would bypass national disease diagnostic and surveillance standards, potentially reducing capacity to monitor and manage the disease.
    - It seems worth noting that the two primary investigators are both founders of the private company Priogen as well as Directors of MNPRO. One of the proposal objectives is all about validating the Priogen test kit solely for profit, which again we do not see how the state or tribal nations would benefit.

- The other concern with this proposal "United in Responding to CWD in Minnesota" is the lack of collaboration with MNDNR. This would be particularly critical when it comes to the outreach component of the work. I see no mention of working in collaboration with MNDNR and tribes to develop consistent statewide messaging on CWD. One of the biggest challenges with CWD is the complexity of the disease and ability to effectively inform people about the disease in a way that is understandable. The message needs to be consistent across all entities to be effective. Incorporating both tribes and DNR in message development would create more consistent and robust messaging across the state to target critical messages needed to address the disease. This might also help steer messaging to the most important aspects of the disease and avoid creating materials designed to emphasize University contributions.

- When looking at their budget layout, it appears that this project is funding the equivalent of around 27 full time positions plus 6 graduate students. I am guessing that is split across 2 or 3 years (so 9 positions per year potentially), but it seems like a lot. The environmental monitoring work proposed and modeling of spread are all academic endeavors, as we don't see much management benefit coming from them.

- It's a little unclear in the proposal on whether they plan to use this funding to create a new building/infrastructure, or if the infrastructure is there and it is just funding something that they want for this specific project.

- I do feel that the objective of tribal support is good, and maybe there is a way to recommend funding that objective, but it looks like they are charging a lot of money for that work which ultimately is just collecting the deer head and delivering it to VDL to do all the work. There are much more cost effective and efficient ways to facilitate testing such as hunter mail in kits, or designating partners in certain areas that would be trained to help collect the sample/data and be compensated per sample.

I hope some of this feedback is useful. Feel free to shout with any questions.

Thank you,

Erik

Erik Hildebrand

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