

Minnesota Department of Natural Resources

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Office of the Commissioner

651-259-5555



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October 20, 2014

Susan Thornton, Director, LCCMR
 100 Rev. Dr. Martin Luther King Jr. Blvd.
 State Office Building, Room 65
 St. Paul, MN 55155

Dear Susan Thornton:

In June 2014 the Legislative-Citizen Commission on Minnesota Resources (LCCMR) recommended funding the DNR's Minnesota Biological Survey (MBS) at \$2.0 million from the Environment and Natural Resources Trust Fund (ENRTF) for two years beginning in July 2015.

The support provided by the ENRTF is essential to MBS's scheduled completion of the statewide baseline surveys by 2021. The Department greatly appreciates the financial support; however, there are two concerns I would like you to be aware of regarding this recommendation.

- 1) The \$650,000 reduction from the current level (FY13/14) of support for MBS will result in the loss of six field staff, delay completion of baseline surveys by three years, and significantly limit staff capacity to provide interpreted information.

The loss of six trained biologist positions is a significant reduction to program activities. Highly qualified biologists are difficult to recruit due to the specialized nature of their work. The training and mentoring of younger biologists is a significant investment and value to the State of Minnesota.

Over the years, LCCMR members have consistently emphasized the need for MBS to not only collect data, but to engage in interpretation, training and the delivery of products useful in conservation and management within and outside of the DNR.

At the recommended funding level our proposed work plan would be reduced as follows:

- Delay completion of baseline surveys in northern Minnesota from 2021 to 2024. *The Forest Certification process has relied on MBS data especially as related to identification and management of high conservation value forests.*
- Reduction and delay in specimen processing, data management, and coordination with other institutions.
- Surveys of groups of organisms, such as pollinators, would be limited. *Information on distribution and life history of many pollinators is unknown and is needed for updates to best management practices on state lands as directed by legislation.*
- Native plant community polygons would not be mapped and updated; especially in the western prairie region and in southeastern Minnesota. These data are now 20 years old

Susan Thornton, LCCMR
October 20, 2014
Page two

and increasingly out-of-date. *These data are needed to update various plans including the Prairie Conservation Plan, the State Wildlife Action Plan, state forest plans, watershed plans, and county park plans.*

- Reduction and delay in data delivery, technical assistance, product delivery, and training. *For example, the recent protection of the Badoura Woodlands site (as an SNA) benefited from a timely report that summarized the woodland's ecological significance. Prairie plan local implementation team members received plant identification training to enhance their credibility in grassland conservation efforts. Residents of selected lakes can view native aquatic plants using lakefinder.*

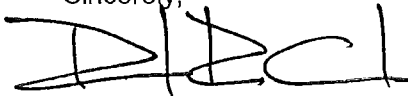
2) The second issue is related to our ability to cover the costs of supporting this program.

The Commission's intent that direct and necessary costs would not need to be included in the MBS work plan remains unclear to us. Based on our most recent understanding of this issue, we have included them in the work program for the following reasons:

- The MBS program relies heavily on biologists completing field surveys and assessments, which carries substantial costs related to staffing and data management. These include the Department's direct costs of supporting staff with communications, information technology, human resources, and accounts payable.
- If other funding sources were used to cover these costs, they would carry a disproportionate amount of the agency's direct and necessary support costs. Many of these other funding sources are dedicated accounts with constituencies who would not support expenditures of dedicated funds for unreasonably high support costs. In addition, we do not have the necessary legislative authority to support these costs from other funding sources.

In summary, the Department requests that the LCCMR reconsider the recommended ENRTF funding for continuation of the MBS, bringing it at least to the current level of \$2,650,000 for the biennium. We also request acknowledgement that direct and necessary costs can be covered in the work plan. We look forward to working with you in the coming months to find a solution that maintains the momentum of this important program.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Schad', written over a horizontal line.

Dave Schad
Deputy Commissioner