

Commissioner Sarah Strommen  
Minnesota Department of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155

Dear Commissioner Strommen,

February 2, 2021\*

\*Updated March 2, 2021

We write to you, as conservation partner organizations working to conserve Minnesota's lands, natural resources and wildlife habitat, to reflect on the Department of Natural Resources FY22-23 funding proposal included in Governor Tim Walz's January 26, 2021 budget recommendations. We specifically write to convey thoughts and recommendations related to the Reinvest in Minnesota Critical Habitat Match proposal (RIM CHM).

The DNR proposal in the Governor's budget recommendations includes two changes we believe will help accelerate the ability to deliver critical habitat acquisitions, and that our organizations supported in prior conversations with your agency. They include: 1) changing the match ratio requirement to allow the use of \$2 RIM CHM dollars for every \$1 in private match, and 2) altering the cap on non-game contributions. We applaud and support the agency for recommending these changes.

We are concerned, however, that the two other proposed changes to RIM CHM will result in a further erosion of funding devoted to habitat conservation, rather than grow the pot of investments for this purpose.

First, we are concerned by the proposal to expand eligible uses for the Critical Habitat Match funds for activities like monitoring surveys, research, and easement monitoring. These activities are important, and we support seeking other resources for this purpose, but the intended uses of the fund established in statute are clear and just as important today as when the RIM CHM program was first created:

*Money in the account is appropriated to the commissioner of natural resources only for the direct acquisition or improvement of land or interests in land as provided in section [84.944](#). To the extent of available appropriations other than bond proceeds, the money matched to the nongame wildlife management account may be used for the management of nongame wildlife projects as specified in section [290.431](#). Acquisition includes:*

- (1) purchase of land or an interest in land by the commissioner; or*
- (2) acceptance by the commissioner of gifts of land or interests in land as program projects.*

*Minn. Statutes 84.943, Subd. 5(b)*

Increasing threats to habitats and biodiversity from climate change and development have only elevated the need for the RIM CHM program; protecting critical lands through this program will do more for wildlife resiliency and carbon sequestration than other proposed uses of these funds.

Additionally, Minnesota citizens who donate through Critical Habitat License plates expect that their investments will be used to provide and protect critical habitat. Not fulfilling this promise to the public is misleading and conflicts with current statute.

Second, we are concerned that this proposal could result in supplanting and a lack of increased investment for on-the-ground projects by expanding the funds eligible to match RIM CHM dollars. According to the enabling statute for the RIM CHM, license plate revenues in this program “*may be expended only to the extent they are matched equally with contributions from private sources or by funds contributed to the nongame wildlife management account.*” *Minn. Statutes 84.943, Subd. 3.*

Allowing existing dedicated funds like the Environmental and Natural Resources Trust Fund and Outdoor Heritage Fund --that are already directed toward specific conservation purposes—to be used for matching would undercut the ability to increase needed overall investments in conservation of critical habitat in the state. We would rather see barriers removed for partners and donors to develop projects with RIM CHM funds that have been unable to do so due to process hurdles. We would like to work with you to improve the process and reduce those barriers to implement much-needed projects.

We recognize the significant challenges DNR faces in balancing many needs of a wide-ranging agency responsible for the state’s natural resources, but we hope that the urgent threats and demand for critical habitat protection demonstrates the need to continue to invest the RIM CHM dollars as originally intended. We welcome the chance to further discuss ways to partner with you to pursue and support meeting DNR’s full funding needs in the face of eroding investments in conservation. As conservation advocates and implementors, we look forward to the opportunity to work with you further to modify the agency’s proposal to protect the intent of the Critical Habitat program, and support the important work of your agency.

Sincerely,

Audubon Minnesota  
Backcountry Hunters and Anglers  
Conservation Minnesota  
Ducks Unlimited  
Fergus Falls Fish and Game Club  
Fox Lake Conservation League  
Izaak Walton League – MN Division  
Izaak Walton League – WJ McCabe Chapter  
Lake Superior Steelhead Association  
Minnesota Conservation Federation  
Minnesota Deer Hunters Association  
Minnesota Outdoor Heritage Alliance  
Minnesota Pheasants, Inc.  
Fish Lake Sportsmen’s Club\*  
LeCenter Sportsmen’s Club\*  
Montgomery Sportsmen’s Club\*

Minnesota Sharp-tailed Grouse Society  
MN-FISH Sportfishing Foundation & Coalition  
New Ulm Area Sport Fisherman  
Nicollet Conservation Club  
Pheasants Forever  
Ruffed Grouse Society &  
American Woodcock Society  
Saint Paul Audubon Society  
The Conservation Fund  
The Nature Conservancy  
Trout Unlimited  
Trust for Public Land  
Viking Sportsmen Club  
New Prague Sportsmen’s Club\*  
Rainy Lake Sportfishing Club\*  
Scott-Le Sueur Waterfowlers\*  
Twin Lake Sportsmen’s Club\*

CC: Barb Naramore, Deputy Commissioner  
Bob Meier, Assistant Commissioner  
Dave Olfelt, Fish & Wildlife Division Director