



John P. Lenczewski, Executive Director
Minnesota Trout Unlimited
PO Box 845
Chanhasen, MN 55317
612.670.1629
jlenczewski@comcast.net

February 7, 2014

Bill Becker
Executive Director
Lessard-Sams Outdoor Heritage Council
100 Rev. Dr. Martin Luther King Jr. Blvd.
Room 95, State Office Building
St. Paul, MN 55155
Bill.Becker@lsohc.leg.mn

Via electronic mail

Re: Outdoor Heritage Fund Call for Funding Request and Funding Priorities

Dear Mr. Becker:

I have a few comments for the Council's consideration which I hope will improve the proposed FY2016 Call for Funding Requests and ensure the best conservation work is funded.

Section 2, Item 4.

A requirement that every aspect of a riparian habitat restoration project be completed within 3 years could be problematic. In-stream habitat work is typically completed within 3 years, despite permitting processes and five month work seasons. However, the establishment of native vegetation in riparian areas subject to unpredictable flooding can require an addition 1 to 3 years after initial seeding. This is especially true in the case of native prairie which may require burning, mowing and/or spot spraying of invasive species for two or three summers following seeding. Perhaps requiring "substantial completion" within three years is more appropriate in the context of stream habitat restoration and enhancement?

Section 3, criterion 10.

The scope of this new requirement is not clear. It would appear to require applicants to provide a budget of every project the organization has done in the past 5 years or more. This could be pretty onerous, and it is not clear how well this gets at the apparent purpose. What does "since inception" mean? Our volunteers have done or partnered on habitat improvement projects for more than 40 years. Would we need to go back and try to create budgets for all of them? I believe

a narrative description of how the requested funding would supplement, and not supplant, traditional sources of funding should be sufficient.

Timing (page 13).

I believe the Council intends that the first date in this paragraph be July 1, 2015, not 2014.

Timing of public comments in relation to Council discussion and vote.

I respectfully suggest that adding an opportunity for public comment following general Council discussions of the proposed Call, and before motions and voting are concluded, could be beneficial to decision-making. Following discussions of how the Call might be changed, it could be beneficial if experienced conservation practitioners had an opportunity to point out what the practical implications of these changes might be and whether other changes might address the Council's concerns without unintended consequences. Public comment after all votes are taken is of little value.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script, reading "John P. Lenczewski". The signature is written in dark ink and is positioned above the printed name.

John P. Lenczewski

MEMORANDUM

To: Members of the Lessard-Sams Outdoor Heritage Council

From: Metropolitan Regional Park System Implementing Agencies

Date: February 7, 2014

Re: **Public Input – FY2016 Call for Funding Request**

The Lessard-Sams Outdoor Heritage Council has asked for public comments on the FY 2016 Outdoor Heritage Fund (OHF) Call For Funding Request. The following comments have been submitted jointly by the ten implementing agencies of the Metropolitan Regional Park System (Dakota County, Scott County, the Minneapolis Park and Recreation Board, Anoka County Parks and Recreation, Three Rivers Park District, Carver County, the City of Bloomington Parks Department, Ramsey County, the City of St. Paul Parks Department, and Washington County).

We understand that the “vision” language for the Metro Urbanizing Section has remained unchanged from prior Calls. However, we are concerned about a sentence in the first paragraph of the vision statement found on page 8 of the January 16, 2014 draft call. The pertinent language is as follows:

The Council’s vision for the Metropolitan Urbanizing Section is the protection through fee and easement acquisition of a network of natural lands in the Section providing wildlife habitat, birding sites, quality fisheries, especially cold-water fisheries and a forest land base that contributes to the habitat picture. [emphasis added.]

A strict but reasonable interpretation of this language would seem to indicate that OHF monies spent in the Metro Urbanizing Section can only be used to purchase land, either through fee title or conservation easement. It cannot be used to enhance or restore properties previously or newly protected. In order to more accurately reflect the subsequent priority action language, we believe the words “through fee and easement acquisition” should be removed or wording should be added clarifying that enhancement and restoration projects are eligible for OHF funding.

The Metro Urbanizing Ecological Section includes all or parts of the counties of Hennepin, Ramsey, Washington, Dakota, Anoka, Scott, Carver, Wright, Sherburne, Isanti, McLeod, Sibley, Meeker and Chisago. This section contains a rich diversity of fish and wildlife habitats in various states of development under both private and public ownership. There are substantial and critical opportunities to protect land through acquisition within this section, particularly in the outer ring suburban and exurban areas. In other areas, communities are fully developed and little open space is left to acquire in order to protect habitat. In either case, there are significant protected habitat areas throughout the section that require enhancement or restoration to provide improved habitat for fish, game and non-game wildlife.

Limiting the availability of OHF monies in the Metro Urbanizing Ecological Section to purely acquisition may exclude many of these worthwhile habitat restoration and enhancement projects. This potential result seems contradictory to the desired outcomes outlined in the subsequent “priority action” sections. For instance, the first bullet point in the “Priority Action for Metropolitan Urbanizing Area with Example of Outcome Measures” on the bottom of page 8 states: “Protect, enhance and restore remnant native prairie, Big Woods forests and oak savanna with an emphasis on areas with high biological diversity.” [Emphasis added.] The third and fourth bullet points also prioritize projects that will enhance and restore fish and wildlife habitat.

While the vision statements for all of the state’s ecological sections express the desired outcomes of protecting, enhancing and restoring fish, game and wildlife habitats, only the Metro Urbanizing Ecological Section is limited to protecting habitat “through fee and easement acquisition.” Several of the visions desired, such as employing vegetative buffers and bank stabilization and eradicating invasive species, cannot be undertaken simply through acquiring land.

And finally, the LSOHC has recommended and the Legislature has appropriated money for several habitat enhancement and restoration projects located in the Metro Urbanizing Ecological Section in the past. As such, it is unclear if the continued inclusion of this language is the intent of the Council or if it is merely an oversight from original drafting of the RFP. We believe the language in the vision statement for this section should be modified to clarify that restoration and enhancement projects are indeed eligible for OHF funding, or that the words “through fee and easement acquisition” be deleted.

Less significantly, there is an unclear sentence of the Metro Urbanizing Vision statement. The fourth sentence in the second paragraph reads, “The Section’s game lakes will be significant contributors of waterfowl, due to efforts to protect uplands adjacent to game lakes.” It is unclear how OHF monies will contribute to “waterfowl.” Perhaps the sentence should read “...contributors to waterfowl production”, “...contributors to waterfowl populations”, or contain some similar modifier to describe the desired outcomes of protecting upland areas around game lakes.

In summary, we request that the words “restoration and enhancement” be added to, or the restrictive words “through fee and easement acquisition” be removed from the Metro Urbanizing Section vision statement, and that the sentence describing the vision protecting upland game lakes be clarified.

Thank you for your consideration.

cc: Representative Jean Wagenius
Senator David Tomassoni