



STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
OFFICE OF THE COMMISSIONER
22 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

March 14, 2025

Senator Rachel Talbot Ross
Representative William Pluecker
Committee on Agriculture Conservation and Forestry
c/o Legislative Information Office
100 State House Station
Augusta, ME 04333

Dear Senator Talbot Ross and Representative Pluecker:

Please accept this letter of support concerning LD 402, *An Act to Move the Natural Areas Program from the Department of Agriculture, Conservation and Forestry to the Department of Inland Fisheries and Wildlife (and to Amend the Law Governing Administration of the Bureau of Resource Management Within the Department of Inland Fisheries and Wildlife)*.

For over 35 years, the Maine Natural Areas Program (MNAP) has carried out its legislative mandate to inventory Maine's natural areas with a specific focus on rare plants, natural communities, and ecosystems and to facilitate informed decision-making in development planning, conservation, and natural resource management. During that period, MNAP has resided in three different departments: the Department of Economic and Community Development, the Department of Conservation (DOC), and for the past several years, within the Department of Agriculture, Conservation and Forestry. For much of that time, MNAP staff and others have questioned whether being housed within the Department of Inland Fisheries & Wildlife (DIFW) would be a more appropriate fit.

Over the past 24 months, a focused exploration of the benefits and considerations of moving MNAP to DIFW has occurred, including a significant effort to get input from MNAP partners and data users on a potential move. In all, 36 individuals representing the public, non-profit, and private sectors were interviewed, including state agencies, planners, developers, large and small landowners, conservation organizations, and others. Though not asked, nearly all interviewees said the Maine Natural Areas Program runs exceptionally well. Individuals were highly complimentary of MNAP staff, finding them to be very knowledgeable and collaborative professionals who are good communicators and provide excellent and timely service to their diverse stakeholders. Because of this, many interviewees had no strong opinion on whether the program should remain at DACF or be moved to DIFW; as a program that provides support to numerous agencies, it is believed that MNAP could seamlessly continue its cross-cutting work in

HARLOW BUILDING
18 ELKINS LANE
AUGUSTA, MAINE



PHONE: (207) 287-3200
FAX: (207) 287-2400
WEB: WWW.MAINE.GOV/DACF

either agency. They pointed to the degree of professionalism within MNAP and expressed confidence that they would receive the same level of service regardless of where the program was housed.

Most interviewees noted that *from an ecological standpoint*, it would be more effective to have one agency oversee the state's rare plants, animals, and natural communities, and that in many states, those functions do all live within one agency. They noted that animals depend on plants and natural communities. Having different agencies document, evaluate, and monitor them leads to decision-making that does not fully account for how natural systems function. Interviewees especially noted that responses to the decline in biodiversity and the effects of climate change (for instance, species migration or the impact of invasives) require resource managers to think more holistically than ever before, and they believe that better resource management decisions would result from a more integrated approach. They observed that separating species from their habitat is a barrier to climate planning, and that habitat details get lost in this compartmentalization. The few interviewees who thought MNAP should remain at DACF cited the strong mission alignment with land management, particularly forests and Ecoreserves.

Concerning *environmental review services*, most interviewees identified an inherent inefficiency in requiring thousands of environmental review requests to be made to two different agencies, one to assess wildlife impacts and another to assess plant and natural community impacts. Further, they pointed to the significant duplication of effort involved in entering the same basic project information into two different databases and generating letters and maps from two agencies. Also, external applicants sometimes do not understand which state agency to contact.

A merger of MNAP within DIFW would reduce duplication of data entry and database development, simplify administrative and financial management, and decrease response times to the public. The prospect of "one-stop shopping" for developers was noted as a significant potential benefit if MNAP moved to DIFW. This benefit would extend to multiple statewide efforts, including expert biological review and technical support to prepare the State Wildlife Action Plan, providing a strategic response to aquatic and terrestrial invasive plants, delivering comprehensive assistance to private landowners, and conserving at-risk species and natural communities.

In addition to MNAP's expressed vision to become part of DIFW, we know that DIFW is enthusiastic about the opportunity. Therefore, we are supportive of LD 402 and look forward to working to ensure a smooth transition for all involved.

MNAP Director, Molly Docherty, can attend this bill's hearing and work sessions and answer any questions about the details of the proposed move to DIFW.

Sincerely,



Judy East, Director, Bureau of Resource Information and Land Use Planning

CC: Amanda Beal, Commissioner, DACF
Judy Camuso, Commissioner, DIFW