

**MINNESOTA DEPARTMENT OF NATURAL RESOURCES**

**LEGISLATIVE REPORT ON  
DNR NATURAL RESOURCE OFFICERS**

03 - 0039

**FINDINGS SUBMITTED TO:**

Senator John Marty – Chair, Environment and Natural Resources Committee

Representative Tom Hackbarth – Chair, Environment and Natural Resources  
Policy Committee

Senator Leo Foley – Chair, Crime Prevention and Public Safety Committee

Representative Rich Stanek – Chair, Judiciary Policy and Finance  
Committee

January 10, 2003



# LEGISLATIVE REPORT ON DNR NATURAL RESOURCE OFFICERS

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## Introduction

In response to an interest in the roles and authorities of Department of Natural Resources Natural Resource Officers, and concerns about the possibly conflicting roles of Conservation Officers and Natural Resource Officers, the 2002 legislature required a review and report to the 2003 legislature. The requirement was set forth in law as follows.

Laws of Minnesota for 2002, Chapter 351

Sec. 32. [STUDY AND REPORT.]

The commissioner of natural resources must review Minnesota Statutes 2000, sections 84.029, 84A.55, and 85.04, and the February 2002 operational order on natural resources officers, and analyze the citation authority for nonconservation officers and how that differs from conservation officer authority generally under the jurisdiction of the commissioner. Included in the review must be an analysis of citations given and proposed to be given by any employee under the commissioner. A report on the study's findings must be given to the house of representatives and senate chairs of the environmental and natural resources policy and the crime prevention committees by January 15, 2003.

The following information has been prepared in response to these requirements and is being presented at the direction and under the authority of the Commissioner of Natural Resources.

## Executive Summary

The Department of Natural Resources has a decades long history of utilizing non-licensed enforcement officers (Natural Resource Officers), as an adjunct to Conservation Officers, to protect the natural resources for which it is responsible and the experiences of visitors to the outdoors. These Natural Resource Officers (NROs) work in the Division of Parks and Recreation, Forestry, Wildlife, and, most recently, Trails and Waterways. The scope of the direct enforcement tasks that they do is narrow and limited to enforcing rule violations specific to their areas of responsibility, and to enforcing minor statutory violations, again, specific to their responsibility areas. Along with the direct enforcement that is done, the NRO provides the outdoor using public with first response to medical and other emergencies, a uniformed presence to deter violations, a proactive response to educate users and prevent escalation of inappropriate and illegal behaviors, a sense of greater security, and a source of information about outdoor recreation. In the event of broader or more serious violations the NRO is a professional staff person, able to recognize and report the violation to a Conservation Officer for resolution.

With the creation of the POST Board standards and Unauthorized Practices Act, statutory conflicts developed over the status of the Natural Resource Officer. Those were recognized by the Department of Natural Resources and steps were taken to administratively limit the actions of the NRO, to stay with the limits of their authority and to avoid conflicts with POST Board standards and the Unauthorized Practices Act. Most recently, the Department of Natural Resources, under Commissioner Garber took steps to better clarify and formalize the limitations and the distinctions between the NRO and a Conservation Officer. These tasks were accomplished with a redraft of DNR Operational Order 94, the establishment of Directives for each DNR operating division with Natural Resource Officers, and a review and reissuing of delegation orders for each NRO. These actions were taken in conjunction with guidance from the State Attorney General.

The Department of Natural Resources recommends two additional actions:

- Revise M.S. § 84.029, 84A.55, and 85.04 to reflect current law. These statutes were enacted prior to the establishment of the POST Board and peace officer standards. Consistent with the direction provided in Operational Order #94, NROs are not peace officers but have limited authority to enforce laws as delegated by the Commissioner of Natural Resources.
- The Minnesota Department of Natural Resources should provide an annual report on NRO activities including the number of warnings and citations issued and the type of violations enforced, and the number of certified NROs and the number of hours directed by NRO staff to enforcement activities.

### **Issue Background**

For many years, Natural Resource Officers (NROs), formerly known as Level-Two Officers, have provided enforcement services and emergency response in the state's parks and recreation areas, forests, and wildlife management areas. They focus on encouraging behaviors that allow positive experiences of the outdoors by citizens. They enforce natural resource regulations when needed by issuing warnings and citations for litter, cross-country ski pass, parking, vehicle permit, and other natural resource related misdemeanor violations, as well as responding to medical, fire, and other emergencies. They also provide a presence to help deter violations and provide a sense of security to outdoor users.

The Minnesota Forest Service, which is now the DNR Division of Forestry, was created in 1911. At that time Forest Rangers were authorized by state law to enforce the fire regulations (M.S. § 88.01 to 88.22). In 1923, Parks received statutory law enforcement authority (M.S. § 85.04) and in later years this authority was expanded to include designated staff working in wildlife management areas (M.S. § 84A.55). Finally, in 1969 under the establishment of the Outdoor Recreation Act (M.S. § 84.029) the Commissioner was granted the authority to designate peace officer status to department employees for the purpose regulating recreation on public lands.

The 1977 Minnesota Legislature created the Board of Peace Officer Standards and Training (POST Board) and charged the POST Board with the responsibility of

establishing a mandatory system for police licensing, standards, and training (M.S. § 626.84). Subsequently, in 1987 the Minnesota Legislature passed the Unauthorized Practice Act (M.S. § 626.863) making it illegal for persons to perform activities reserved for licensed peace officers, constables, and part-time peace officers.

The enforcement authorities for Natural Resource Officers as provided in M.S. § 84.029, 84A.055, 84.029 have not been changed to be consistent with the establishment of POST Board standards and the Unauthorized Practices Act. Recognizing that discrepancies exist, the DNR Commissioner's Alexander and Garber, through the establishment of internal policies in department Operational Orders, have restricted the authority of NROs to be consistent with current law and practices.

Commissioner Joe Alexander recognized that field staff in parks, wildlife and forestry came across routine minor violations as part of their normal job duties. In 1980, he authored the first Operational Order that delegated limited authority to specific qualified field staff with the intent that those staff would react to minor violations and provide an enforcement "presence" in our parks, wildlife management areas, and forests. NROs are intended to complement the work of Conservation Officers by promptly handling minor violations and referring more serious violations to Conservation Officers and local peace officers.

Because of his extensive experience in law enforcement at both the federal and local level, Commissioner Garber identified a number of issues that needed attention. In 2002 Garber ordered a revision of Operational Order #94 to clarify the roles and responsibilities of the NRO to make them consistent with Minnesota law enforcement statutes. Importantly, he revised the Operational Order to clarify that NROs are not peace officers but have limited authorities to proactively respond to specific types of natural resource violations and to issue citations and warnings when appropriate. This reinforced and clearly communicated the distinction between the roles of the NRO and Conservation Officers, within the Department of Natural Resources, and emphasizes the complementary nature of their roles.

In contrast to the NRO, Conservation Officers are licensed peace officers as authorized under M.S. § 626.84 and as directed by the Commissioner of Natural Resources under M.S. § 84.028. State Conservation Officers are responsible for the prevention and detection of crime and the enforcement of general criminal laws of the state and specifically the enforcement of laws related to natural resources management, they have the full power of arrest and all other enforcement authorities granted to licensed peace officers in the state.

Because of the varied roles, the number of Conservation Officers is not directly related to the need for the NRO, but it is significant to note that there has not been an increase in the State Conservation Officer field compliment since the 1940's. Each time a new park or trail or program is developed it increases the workload of a Conservation Officers, yet that need has not been factored into the overall field Conservation Officer staffing levels. Today, there are less than 130 field officers to serve the state's resource and recreational enforcement needs. Clearly, there is a need for more Conservation Officers, and there is

also a need to complement the efforts of Conservation Officers with work by NROs in areas where it is practical to do so.

The NRO program is similar to well-accepted programs used by counties and cities. In many cities, community service officers work with and under the direction of the local police department to enforce city codes and ordinances. Most often community service officers are involved in traffic control, and enforcement of parking and vehicle storage codes. In most cities, other city staff such as building inspectors have general authority and responsibility to enforce city laws related to the scope of their jobs. For example, the city of Bloomington uses Animal Control Officers to enforce city code related to dog licenses and permits and grants the Animal Control Officers the authority to issue citations and summons for gross misdemeanor violations as provided in M.S. § 609.266 and 609.277.

NRO authorities are limited to specific natural resource misdemeanor violations, ranging from timber trespass in state forests and fire violations on private lands, to parking and litter violations in state parks. NROs are also limited in the tools they can use to do their jobs. NROs may only make courtesy stops. They cannot make traffic stops. They cannot make arrests. They are not allowed to carry firearms. They enforce state natural resource regulations, but not criminal statutes, and not game and fish laws. They may conduct searches only with the consent of the individual.

Following are examples of the type of enforcement actions conducted by the Divisions of Parks and Forestry NROs. In calendar year 2001 Park NROs issued 5,712 courtesy notices for vehicle permit violations and 86 misdemeanor citations for violations of park rules such as dogs off leash, litter, and illegal parking to park visitors. Each year Forestry NROs respond to well over 1000 wildfires and burning complaints, the majority of which involve violations of fire statutes. It would not be effective or efficient to expect that Conservation Officers would provide enforcement activities for these types of violations.

In 2002, the Commissioner extended NRO authority to the Trails and Waterways Division with the intent of complementing Conservation Officer enforcement work related to Off-Highway Vehicles (OHVs) and reducing Division of Forestry staff duties related to recreational enforcement. This action allowed the Division of Forestry to more narrowly focus its efforts on forest management and wildfire suppression. Overall this action resulted in a decrease in the number of certified NROs in the department. The following chart shows the number of certified NROs before and after 2002.

	Before 2002	January 2003
Forestry	220	114
Parks and Recreation	120	120
Trails and Waterways	0	17
Wildlife	15	14
<b>Total</b>	<b>355</b>	<b>265</b>

Importantly, enforcement activities constitute only a portion of the day-to-day responsibilities for NROs. For example, in the Division of Parks the Park Managers and assistant managers are usually the only staff certified as NROs. In their role as Park Managers and assistants they are responsible for all activities and staff in the park, this includes the hiring and firing of staff, educational and interpretive programs, maintenance, and emergency response services. Typically, only 20% of an individual NRO's job duties are related to enforcement, but through their uniformed presence, they are providing a deterrent to violations, and an availability to deal with violations, 100% of the time they are on duty doing their other tasks.

### **Statutory Authority**

In 2002, Commissioner Allen Garber requested an Attorney General's Opinion as to what law enforcement authority Minnesota statutes grant to employees of the Department of Natural Resources that hold the title of Natural Resource Officer. The March 14, 2002 opinion, attached, provides an overview of the direct and delegated authorities provided in statute.

#### **Direct Authority**

M.S. § 84.029, sub. 1, 84A.055 and 85.04 directly grant peace officer authority and powers to DNR employees who are so designated by the commissioner. In particular:

M.S. § 84.029, sub. 1 states that *..“In addition to other lawful authority, the commissioner of natural resources may establish, develop, maintain, and operate recreational areas, including but not limited to trails and canoe routes, for the use and enjoyment of the public on any state-owned or leased land under the commissioner's jurisdiction. Each employee of the department of natural resources, while engaged in employment in connection with such recreational areas, has and possesses the authority and power of a peace officer when so designated by the commissioner”.*

M.S. § 84A.055 sub. 8 state that: *..“The commissioner may police the game preserves, areas, and projects as necessary to carry out this section. Persons assigned to the policing have the powers of police officers while so engaged”.*

M.S. § 85.04 states that: *..“All supervisors, guards, custodians, keepers, and caretakers of state parks, state monuments, state recreation areas, and state waysides shall have and possess the authority and powers of peace officers while in their employment”.*

Commissioner Garber, recognized that the granting of peace officer authority to individual DNR staff that had not met POST Board standards would be a violation of state law. He correctly revised the Operational Order to restrict NRO authorities and to clearly identify that NROs are not licensed peace officers and do not have the authority and powers of peace officers.

## **Delegated Authority**

The other general source of authority for DNR employees arises from the Commissioner possessing certain enforcement responsibilities and, in turn, delegating those responsibilities to other employees pursuant to the Commissioner's delegation authority.

M.S. § 84.01, subd. 3, provides that the Commissioner may delegate any of the Commissioner's powers, duties and responsibilities to DNR employees as follows:

*Subject to the provisions of Laws 1969, chapter 1129, and to other applicable laws the commissioner shall organize the department and employ three assistant commissioners, each of whom shall serve at the pleasure of the commissioner in the unclassified service, one of whom shall have responsibility for coordinating and directing the planning of every division within the agency, and such other officers, employees, and agents as the commissioner may deem necessary to discharge the functions of the department, define the duties of such officers, employees, and agents and to delegate to them any of the commissioner's powers, duties, and responsibilities subject to the control of, and under the conditions prescribed by, the commissioner. Appointments to exercise delegated power shall be by written order filed with the secretary of state.*

M.S. § 84.083, subd. 1 also provides that the Commissioner may delegate any of the powers and duties vested in or imposed upon the Commissioner:

*Each division shall have charge of administering the activities indicated by its title and such other duties and functions as may be assigned by the commissioner, subject to the right of the commissioner to revise and change assignments of any and all activities or of specific duties or functions at any time as the commissioner may see fit, including but not limited to the right to abolish or revise existing divisions or to establish new divisions. The commissioner may, by written order filed in the office of the secretary of state, delegate to the directors or other designated employees, any of the powers or duties vested in or imposed upon the commissioner by this act or by any other law upon such conditions as the commissioner may prescribe and subject to modification or revocation at the commissioner's pleasure. Such delegated powers and duties may be exercised or performed by the respective directors or other employees in their own names or in the name of the commissioner, as the commissioner may direct.*

Under M.S. § 97A.201, subd. 1 the Commissioner is expressly authorized to delegate his responsibility of enforcing the laws relating to wild animals (which includes game and fish laws) to enforcement officers, which includes game refuge managers, who are not licensed peace officers:



*The commissioner shall execute and enforce the laws relating to wild animals. The commissioner may delegate execution and enforcement of the wild animal laws to the director and enforcement officers.*

### **Natural Resource Officer Citation Authority**

The Natural Resource Officer Program has been carefully constructed to; limit NRO authority to misdemeanor citations for natural resource violations excluding violations of game and fish laws contained in M.S. § 97A, 97B, and 97C or the rules promulgated thereunder, provide for consistency in training and certification, and hold program managers accountable for the actions of their staff. The NRO Program framework includes an Operational Order, Delegation Orders, and Division Directives.

**Operational Order #94**, attached, provides department guidelines for NROs. The Order addresses the following issues:

- **Limits on Enforcement Authority:** The order provides that NROs are not licensed peace officers but possess law enforcement authority pursuant to statutory authorization, division specific authorities as provided in each division's NRO directive, and as designated by the Commissioner.
- **Training and Background Checks Requirements:** The order establishes training requirements and procedures for background checks.
- **Limits on Searches and Seizures, Interviews and Interrogations, Stops and use of Physical Force:** The order places restrictions on the tools that NROs can use to do their jobs.
- **Limited authority to issue warnings and misdemeanor citations:** NROs are not authorized to enforce game and fish laws and are further limited by division directives.
- **Requirements for Uniforms:** The order requires that all NROs wear their uniforms when conducting their duties.

**Delegation Orders** issued by the Commissioner and registered with the Secretary of State designate the authority and power of a Natural Resource Officer to specified individuals who have successfully completed the required training.

**NRO Directives** for Forestry, Parks and Recreation, Trails and Waterways, and Wildlife Divisions, attached, identify the specific misdemeanor citation authority for the NROs in each division. This approach provides the flexibility to revise misdemeanor citation authority in a timely manner when needed to address changes in statute, changes in public recreation and unforeseen circumstances. For example, the Division of Parks and Recreation amended the NRO division directive on July 3, 2002 to provide Parks NROs with the authority to issue misdemeanor citations for violations of state laws related to the possession and use of fireworks. The 2002 Minnesota Legislature authorized the sale, possession and use of certain fireworks and sparklers and prohibited use of those items on public lands (M.S. § 624.20, 624.21, and 624.25). The flexibility to revise NRO authority in a timely manner assured that parks managers would have the ability take prompt action to address fireworks violations and provide for a safe and secure environment for parks visitors.

**NRO Misdemeanor Citation Authority** is provided in the NRO directives for each division as follows:

**Division of Forestry**

Legal Citation	Type of Authority
M.S. § 88.01 to 88.22	Misdemeanor citations relating to wildfire.
M.S. § 88.641 to 88.648	Misdemeanor citations relating to decorative trees.
M.S. § 90.061	Misdemeanor citations relating to stand appraisals.
M.S. § 90.301	Misdemeanor citations relating to timber trespass.
M.S. § 85.40 to 85.45	Misdemeanor citations relating to cross-country ski violations.
Minn. Rules 6100	Misdemeanor citations relating to recreational uses of state park and forest lands.
Minn. Rules 6102	Misdemeanor citations relating to Off-highway vehicle violations on state park and forest lands.

**Division of Parks and Recreation**

Legal Citation	Type of Authority
M.S. § 85.052 to 85.055, 85.20.	Misdemeanor citations relating to permits, violations of park rules such as littering and dogs off leash and courtesy notices for vehicle permit violations.
M.S. § 85.40 to 85.45.	Misdemeanor citations relating to cross-country ski violations.
M.S. § 624.20 to 21.	Misdemeanor citations relating to the use of fireworks and sparklers.
Minn. Rules 6100	Misdemeanor citations relating to recreational uses of state park and forest lands.

**Division of Trails and Waterways**

Legal Citation	Misdemeanor Citation Authority
Minn. Rule 6102	Misdemeanor citations relating to Off-highway vehicle violations on state park and forest lands.
Minn. Rule 6100	Misdemeanor citations relating to recreational uses of state park and forest lands.

**Division of Wildlife**

Legal Citation	Type of Violation
Minn. Rules 6230	Misdemeanor citations relating to the use of Wildlife Management Areas including parking, overnight use, motor vehicle use, stands, litter and other administrative violations.
M.S. § 86A as restricted by Operational Order #94	Misdemeanor citations relating to the Outdoor Recreation Act.
M.S. § 97A, 97B, and 97C as restricted by Operational Order #94	Misdemeanor violations of game and fish laws that restricted to administrative violations only.

## Conservation Officer Authority and Enforcement Roles

Conservation Officers of the Enforcement Division are the principle law enforcement component of the Department of Natural Resources. Natural resources law enforcement requires a high degree of specialization. Minnesota Conservation Officers are professional, full-time law enforcement officers trained broadly on state and federal laws and regulations, and knowledgeable about the fish, wild animals and other eco-systems and resources they are striving to protect.

By contrast, NROs fulfill an adjunct role. NROs are not full-time, professional law enforcement officers. They are not trained to perform law enforcement duties across a broad spectrum. Rather, in performing their regular duties in the field, they invariably come across resource users who are committing violations in their specific professional area. By empowering NROs to approach users and educate them about the law, and to issue citations and warnings for routinely encountered minor offenses, the Department is able to provide *more* enforcement without siphoning away Conservation Officer time from other priorities and more major violations. NROs are on-the-scene resource professionals, who can identify violations and bring the more serious ones to the attention of Conservation Officers, and also function as the code compliance officers who issue tickets for the minor offenses.

The specialized mission of Minnesota's Conservation Officers is delineated in law, as well as in the Division of Enforcement's operating guidelines. M.S. § 97A.205 establishes the primary responsibility of Conservation Officers to be the enforcement of natural resource rules and regulations, and recreational safety. This focus is echoed in Enforcement Division Directive O-6-99. The Directive further clarifies that enforcement of general criminal law should be limited to lands and waters owned, administered or controlled by the Department of Natural Resources. As licensed peace officers, Conservation Officers may take immediate action to stop an assault or damage to property, or to manage a situation that presents an immediate threat to public safety. They are dependent upon local, county, and state highway patrol officers for backup, when necessary, and reciprocate upon request to provide needed expertise and assistance.

The jurisdiction of Conservation Officers is statewide and on boundary waters. Conservation Officers may be cross-deputized with federal authority as well as with American Indian Tribal Governments and other states to enforce natural resources, conservation, fish, and wildlife laws of those tribes and/or states pursuant to formal cooperative law enforcement agreements approved by the Department of Natural Resources.

The complement of Conservation Officers has remained nearly unchanged since the 1940's. In 1941, there were 147 field stations staffed by 135 'game wardens.' Today, there are 150 field stations staffed by 128 Conservation Officers. The average Conservation Officer patrol area is in excess of 650 square miles, with some in excess of 1600 square miles. The name change from game wardens to "Conservation Officers" in 1968 was intended to reflect the broadening of focus from traditional game and fish law enforcement to include other recreational and environmental duties. In addition, over the past sixty years the state's population has nearly doubled. The number of hunting

licenses sold has nearly tripled. 1.4 million fishing licenses are sold annually. More than 158,000 ATV's and 287,000 snowmobiles are registered; both were unheard of in 1941. 825,000 boats and 35,000 personal watercraft are registered today. Technological advances have also increased access to public waters and wild lands and have increased harvest pressures on Minnesota's natural resources.

NROs play an important part in addressing minor, routine violations that, if left unchecked, cumulatively impact our resources. They are an important supplement. They can only help to narrow a widening gap between the overall need for law enforcement and the funding actually provided for law enforcement. They cannot replace the role of Conservation Officers nor significantly affect the increasing demand for additional Conservation Officers.

### **Analysis**

An analysis of the 2002 activities of the Department of Natural Resources NROs will be available by January 31, 2003.

### **Recommendations**

The DNR recommends the following:

- 1) Revise M.S. § 84.029, 84A.55, and 85.04 to reflect current law. These statutes were enacted prior to the establishment of the POST Board and peace officer standards. Consistent with the direction provided in Operational Order #94, NROs are not peace officers but have limited authority to enforce laws as delegated by the Commissioner of Natural Resources.
- 2) The Minnesota Department of Natural Resources should provide an annual report on NRO activities including the number of warnings and citations issued and the type of violations enforced, and the number of certified NROs and the number of hours directed by NRO staff to enforcement activities.

STATE OF MINNESOTA  
**Office of the Attorney General**

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TO: ALLEN GARBER  
Commissioner  
Department of Natural Resources

DATE: March 14, 2002

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SUBJECT: **Statutory Law Enforcement Authority for Natural Resource Officers**

You requested an opinion from this Office as to what law enforcement authority Minnesota statutes grant to employees of the Department of Natural Resources that hold the title of Natural Resource Officer.

The Natural Resource Officer designation is a title only and encompasses DNR employees employed in various fields including park and recreation, forestry, wildlife and trails and waterways. Before February 2002, the DNR referred to Natural Resource Officers generally as Level II Law Enforcement Officers. On January 31, 2002, the DNR issued a revised Operational Order # 94 that eliminated the term Level II Law Enforcement Officers and instead referred to these employees as Natural Resource Officers.

Natural Resource Officers ("DNR employees") are not licensed peace officers. Pursuant to statute, however, DNR employees do possess limited law enforcement authority as part of their scope of employment to protect the State's resources and to provide public safety and service. These statutory provisions either grant the authority directly to the DNR employees assigned that responsibility by the Commissioner or grant the authority to the Commissioner who, in turn, has the ability to delegate the authority to selected employees. The various provisions and the authority they provide are discussed in the following paragraphs.

Essentially, the express statutory authority falls into three categories. The first category consists of a statutory provision that expressly grants general law enforcement powers to DNR employees designated by the Commissioner to work in connection with recreational areas. The second category consists of a provision that expressly confers the authority and powers of a peace officer upon certain types of DNR employees working in state park areas. The third category includes statutory provisions that expressly grant specified law enforcement powers, such as the authority to make stops, inspections, seizures, and arrests, to DNR employees as designated by the Commissioner relating to forestry responsibilities.

## I. DIRECT AUTHORITY

There are two Minnesota statutes that expressly state that DNR employees shall have and possess the authority and power of a peace officer. Minn. Stat. § 84.029, subd. 1 provides that each employee of the department of natural resources has and possesses the authority and power of a peace officer when so designated by the commissioner. In particular, section 84.029 states that:

*In addition to other lawful authority, the commissioner of natural resources may establish, develop, maintain, and operate recreational areas, including but not limited to trails and canoe routes, for the use and enjoyment of the public or any state-owned or leased land under the commissioner's jurisdiction. Each employee of the department of natural resources, while engaged in employment in connection with such recreational areas, has and possesses the authority and power of a peace officer when so designated by the commissioner.*

Minn. Stat. § 84.029, subd. 1 (emphasis added). Minn. Stat. § 85.04 also expressly states that "[a]ll supervisors, guards, custodians, keepers, and caretakers of state parks, state monuments, state recreation areas, and state waysides *shall have and possess the authority and powers of peace officers while in their employment.* Minn. Stat. § 85.04 (emphasis added).

There are several additional statutes that expressly grant specified law enforcement powers to DNR employees assigned forestry responsibilities. These statutory provisions include, but are not limited to, the following:

1. Minn. Stat. §§ 88.10 and 88.11

Minn. Stat. § 88.10 expressly charges DNR employees with the obligation to prevent and extinguish wildfires and to perform such other duties as may be required by the commissioner. In performing these duties, section 88.10 provides that these DNR employees shall have the right to arrest without warrant any person found violating the provisions of sections 88.03 to 88.22 of the forestry statutes. The express statutory authority also includes the right to go onto private property and set backfires, dig or plow trenches, cut timber for clearing fire lines, dig water holes, remove fence wires to provide access to the fire or carry on all other activities necessary for the fighting of wildfires. Minn. Stat. § 88.10 states the following:

*Under the direction of the commissioner, forest officers are charged with preventing and extinguishing wildfires in their respective districts and the performance of such other duties as may be required by the commissioner. They may arrest without warrant any person found violating any provisions of section*

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*88.03 to 88.22, take the person before a court of competent jurisdiction in the county charging the person so arrested, and the person so charged shall be arraigned and given a hearing on the complaint. The forest officers shall not be liable in civil action for trespass committed in the discharge of their duties. All authorized state forest officers, fire wardens, conservation officers, smoke chasers, fire supervisors or individuals legally employed as firefighters, may in the performance of their duties of fire fighting go onto the property of any person, company, or corporation and in so doing may set backfires, dig or plow trenches, cut timber for clearing fire lines, dig water holds, remove fence wires to provide access to the fire or carry on all other customary activities necessary for the fighting of wildfires without incurring a liability to anyone, except for damages arising out of willful or gross negligence.*

Minn. Stat. § 88.10, subd. 1 (emphasis added). Minn. Stat. § 88.11 also allows DNR employees to summon any person of the age of 18 years or older to assist in stopping fires and commandeer equipment, tools, appliances or other property in the possession of any person summoned.

2. Minn. Stat. §§ 88.15 and 88.17

Minn. Stat. § 88.15 expressly provides that a forest officer shall take action against a person or persons responsible for leaving a campfire burning:

*Any forest officer, conservation officer, or other peace officer who finds that any person has left a campfire burning shall take measures to extinguish the fire and take action against the person or persons responsible for leaving the campfire burning.*

Minn. Stat. § 88.15, subd. 1 (emphasis added). Minn. Stat. § 88.17 provides in relevant part that those DNR employees have the right to request a permittee to produce a permit for inspection:

*A permit to start a fire to burn vegetative materials and other materials allowed by Minnesota Statutes or official state rules and regulations may be given by the commissioner or the commissioner's agent. This permission shall be in the form of a written permit signed by a forest officer, fire warden, authorized Minnesota pollution control agent, or other person authorized by the forest officer, or town fire warden, and shall set the time and conditions by which the fire may be started and burned. The permit shall also specifically list the materials that may be burned. The permittee must have the permit on their person and shall produce the permit for inspection when requested to do so by a forest officer, town fire warden, conservation officer, or other peace officer.*

Minn. Stat. § 88.17, subd. 1 (emphasis added).

3. Minn. Stat. §§ 88.642 and 88.645

Pursuant to Minn. Stat. § 88.642, DNR employees may require a person to exhibit a written consent or bill of sale for decorative trees. In addition the officer has the authority to inspect trees being transported in a vehicle or other means of conveyance or by common carrier, to make an investigation to determine whether or not the provisions of Minn. Stat. §§ 88.641 to 88.648 have been complied with, to stop any vehicle or other means of conveyance found carrying decorative trees, for the purpose of making an inspection and investigation, and to seize and hold subject to the order of the court any decorative trees found being cut, removed, or transported in violation of any provision of sections 88.641 to 88.648. The language of Minn. Stat. § 88.642 states, in relevant part:

No person shall cut, remove, or transport for decorative purposes or for sale in natural condition and untrimmed, more than three decorative trees as defined herein, without the written consent of or a bill of sale provided by the owner of the land on which the same are grown and whether such land be publicly or privately owned. . . . *The written consent or bill of sale, or a copy thereof . . . shall be carried by every person cutting, removing, or transporting any decorative trees, untrimmed or in their natural condition, or in any way aiding therein, and shall be exhibited to any officer of the law, forest ranger, forest patrol officer, conservation officer, or other officer of the department of natural resources, at the officer's request at any time. Any officer shall have the power to inspect any decorative trees when being transported in any vehicle or other means of conveyance or by common carrier, to make an investigation with reference thereto as may be necessary to determine whether or not the provisions of sections 88.641 to 88.648 have been complied with, to stop any vehicle or other means of conveyance found carrying decorative trees upon any public highways of this state, for the purpose of making an inspection and investigation, and to seize and hold subject to the order of the court any decorative trees found being cut, removed, or transported in violation of any provision of sections 88.641 to 88.648.*

Minn. Stat. § 88.642 (emphasis added). Minn. Stat. § 88.645 provides that these officers may also obtain and execute search warrants in furtherance of their duties:

*Any court having authority to issue warrants in criminal cases may issue a search warrant, in the manner provided by law for issuing search warrants for stolen property, to search for and seize any trees alleged upon sufficient grounds to have been affected by or involved in any offense under sections 88.641 to 88.657. The warrant may be directed to and executed by any officer authorized to make arrests and seizures by sections 88.641 to 88.647.*

Minn. Stat. § 88.645, subd. 1 (emphasis added).



*the name of the commissioner, as the commissioner may direct.*

Minn. Stat. § 84.083, subd. 1 (emphasis added).

Minn. Stat. § 90.301, subs. 2 and 6 provide examples of enforcement responsibilities that the Commissioner may delegate:

Seizure of unlawfully cut timber. *The commissioner may take possession of any timber hereafter unlawfully cut upon or taken from any land owned by the state wherever found and may sell the same informally or at public auction after giving such notice as the commissioner deems reasonable . . . and when any timber so unlawfully cut has been intermingled with any other timber or property so that it cannot be identified or plainly separated therefrom the commissioner may so seize and sell the whole quantity so intermingled and, in such case, the whole quantity of such timber shall be conclusively presumed to have been unlawfully. . . .*

Minn. Stat. § 90.301 subd. 2 (emphasis added).

Ticket for theft violations. *The commissioner may design and issue a ticket in the form, and having the effect, of a summons and complaint, for use in cases of theft of state timber or other state property, where the value of the property is within the limits established by section 609.52, subdivision 3, clause (5). The ticket shall provide for the name and address of the person charged with the violation, the offense charged, the time and place the person is to appear before a court, and any other necessary information.*

Minn. Stat. § 90.301, subd. 6 (emphasis added).

3. Minn. Stat. § 97A.201

Under Minn. Stat. § 97A.201, subd. 1 the Commissioner is expressly authorized to delegate his responsibility of enforcing the laws relating to wild animals (which includes game and fish laws) to enforcement officers, which includes game refuge managers, who are not licensed peace officers:

The commissioner shall execute and enforce the laws relating to wild animals. The commissioner may delegate execution and enforcement of the wild animal laws to the director and enforcement officers.

Minn. Stat. § 97A.201, subd. 1. The term "enforcement officer" means "the commissioner, the director of the enforcement division, a conservation officer, or a *game refuge manager*." Minn. Stat. § 97A.015, subd. 18 (emphasis added).

Minn. Stat. ch. 626 pertains to, among other things, the powers and duties of licensed peace officers. Minn. Stat. § 626.862 expressly recognizes that certain law enforcement functions may be performed by persons who are not licensed peace officers:

*Except as specifically provided by statute, only a peace officer, constable, and part-time peace officer may:*

- (1) issue a citation in lieu of arrest or continued detention unless specifically authorized by ordinance;
- (2) ask a person receiving a citation to give a written promise to appear in court; or
- (3) take a person into custody as permitted by section 629.34.

Minn. Stat. § 626.862 (emphasis added).<sup>1</sup>

## II. DELEGATED AUTHORITY

The other general source of authority for DNR employees arises from the Commissioner possessing certain enforcement responsibilities and, in turn, delegating those responsibilities to other employees pursuant to the Commissioner's delegation authority under Minn. Stat. §§ 84.01, subd. 3, 84.083, subd. 1 or 97A.201.

1. Minn. Stat. § 84.01

Minn. Stat. § 84.01, subd. 3, provides that the Commissioner may delegate any of the Commissioner's powers, duties and responsibilities to DNR employees as follows:

Subject to the provisions of Laws 1969, chapter 1129, and to other applicable laws, the commissioner shall organize the department and employ three assistant commissioners, each of whom shall serve at the pleasure of the commissioner in the unclassified service, one of whom shall have responsibility for coordinating and directing the planning of every division within the agency, and such other officers, employees, and agents as the commissioner may deem necessary to discharge the functions of the department, define the duties of such officers, employees, and agents and *to delegate to them any of the commissioner's powers, duties, and responsibilities subject to the control of, and under the conditions prescribed by, the commissioner.* Appointments to exercise delegated power shall be by written order filed with the secretary of state.

Minn. Stat. § 84.01, subd. 3 (emphasis added).

2. Minn. Stat. § 84.083

Minn. Stat. § 84.083, subd. 1 also provides that the Commissioner may delegate any of the powers and duties vested in or imposed upon the Commissioner:

Each division shall have charge of administering the activities indicated by its title and such other duties and functions as may be assigned by the commissioner, subject to the right of the commissioner to revise and change assignments of any and all activities or of specific duties or functions at any time as the commissioner may see fit, including but not limited to the right to abolish or revise existing divisions or to establish new divisions. *The commissioner may, by written order filed in the office of the secretary of state, delegate to the directors or other designated employees, any of the powers or duties vested in or imposed upon the commissioner by this act or by any other law upon such conditions as the commissioner may prescribe and subject to modification or revocation at the commissioner's pleasure. Such delegated powers and duties may be exercised or performed by the respective directors or other employees in their own names or in*

ALLEN GARBER

March 14, 2002

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In summary, there are numerous statutory provisions authorizing DNR employees to possess and utilize law enforcement authority so long as it is within the scope of their employment, as assigned or delegated by the Commissioner.

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<sup>1</sup> For purposes of sections 626.084 to 626.863, the term "peace officer" means:

(1) an employee or an elected or appointed official of a political subdivision or law enforcement agency who is licensed by the board, charged with the prevention and detection of crime and the enforcement of the general criminal laws of the state and who has the full power of arrest, and shall also include the Minnesota state patrol, agents of the division of alcohol and gambling enforcement, state conservation officers, metropolitan transit police officers, and department of corrections' fugitive apprehension unit officers; and

(2) a peace officer who is employed by a law enforcement agency of a federally recognized tribe, as defined in United States Code, title 25, section 450b(e), and who is licensed by the board.

Minn. Stat. §626.84, subd. 1(c).

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**MINNESOTA DEPARTMENT OF NATURAL RESOURCES  
OPERATIONAL ORDER #94**

**SUBJECT:** Natural Resource Officers

**CONTACT:** Assistant Commissioner for Operations

**SUPERSEDES:** Operational Orders Number 66 (dated August 15, 1985), Number 70 (dated February 25, 1980), and Number 94 (dated January 1991)

**I. PURPOSE**

A Natural Resource Officer (NRO) is an employee who has law enforcement authority to protect the state's resources and to provide public safety and service. This Operational Order provides guidelines for NROs. Each division that has NROs shall prepare a directive containing division specific requirements and responsibilities of its NROs consistent with this Operational Order. All division NRO directives must be presented to, and approved by, the Assistant Commissioner for Operations before issuance.

**II. ENFORCEMENT AUTHORITY**

- A. NROs are not licensed peace officers but possess law enforcement authority pursuant to statutory authorization and as designated by the Commissioner.
- B. NROs shall exercise their law enforcement authority only when acting within the course and scope of their employment and only to the extent permitted under this Operational Order. Division specific enforcement duties for an NRO shall be delineated in the division NRO directive.

**III. DESIGNATION**

- A. An employee may be designated as an NRO if such responsibility is within the employee's scope of employment and the employee successfully completes the required training. In those situations where a delegation order is required, the employee must have the requisite delegated authority. Each division that has NROs shall have an NRO Program Coordinator whose role is to administer the NRO process within the division.
- B. Each NRO Program Coordinator in conjunction with the Director of Office of Professional Standards (OPS) and Human Resources (HR) shall conduct background checks on all individuals being considered for designation as an NRO. These background checks shall be conducted in accordance with the appropriate DNR policies and procedures.

#### **IV. TRAINING**

- A. In order to become an NRO an individual is required to successfully complete specified training requirements as mandated by the Department. The Assistant Commissioner for Operations shall establish the training curriculum. The initial training curriculum shall include topics applicable to all NROs including but not be limited to: employee and visitor safety, public information and education as tools of law compliance, issuance of warnings and citations for violations, use of force and ethics. This training curriculum shall also include topics specific to the duties the NRO will perform in a particular division including enforcement authority, jurisdiction, and law compliance responsibilities. The NRO Program Coordinator for each division shall exercise oversight of NRO training within the division. The initial training requirement does not apply to individuals who have successfully completed a course of training leading to designation as a "Level II enforcement officer" before January 1, 2002. Upon successful completion of the required training and instruction, credentials identifying the employee as an NRO shall be issued. NRO credentials issued shall remain property of the employer and may be revoked by the Commissioner.
- B. All NROs shall be required to complete a minimum of 24 hours of refresher training and/or 24 hours of continuing education training every two calendar years to maintain their NRO status.
- C. Each NRO Program Coordinator shall maintain records of initial and subsequent training provided to each NRO. Copies of this information shall be furnished to the Director of Human Resources. The NRO Program Coordinator in each Division shall maintain a roster of the NROs.

#### **V. GENERAL LAW ENFORCEMENT GUIDELINES FOR THE NRO**

- A. Searches and Seizures:
  - 1. NROs may conduct searches with the consent of the individual; however, consent searches shall not include persons, motor vehicles, trailers, campers, fish houses, or tents. NROs shall prepare a written report of the circumstances involving the conducting of the search.
  - 2. NROs may seize items observed in "plain view" or obtained through a consent search. NROs shall prepare a written report of the circumstances involving the seizure of items.

B. Stops:

1. NROs may stop individuals observed in violation of DNR laws or rules, but the method of conducting such stops is subject to the following limitations: all stops are to be courtesy stops and subject to voluntary compliance. NROs shall not utilize emergency warning lights or sirens to command an individual or operator of a vehicle to stop.

C. Issuance of Citations and Warnings:

1. NROs are authorized to issue warnings and citations for violations within the scope of the NRO's authority and observed by the NRO. The scope of authority for NROs does not include violations of the game and fish laws contained in Minnesota Statutes Chapters 97A, 97B and 97C, or the rules promulgated thereunder.
2. NROs may not issue misdemeanor citations except those within the NRO's scope of authority.

D. Use of Physical Force and the Transporting of Persons:

1. NROs shall not use physical force to detain a person except in an emergency, which is creating a threat to life.
2. NROs should obtain as much information as possible and inform the local DNR conservation officer or other licensed peace officer for follow-up and subsequent arrest.
3. NROs shall not transport violators except in situations where the individual or the public is endangered.

E. Interviewing and Interrogation:

1. NROs shall not interrogate individuals.
2. NROs may interview people in non-custodial situations and take other steps to gather information about violations beyond the scope of the NRO's authority and provide such information to the local DNR conservation officer or other licensed peace officer for investigation and the consideration of any criminal charges.

F. Referrals:

1. An NRO shall contact the local DNR conservation officer or other licensed peace officer to refer information of citizen complaints, calls or

observations regarding violations beyond the NRO's scope of authority or if a situation presents an immediate and/or ongoing threat to public safety or property.

G. Defensive Tactics and Equipment:

1. NROs shall be trained in defensive tactics for defending themselves.
2. Firearms, stun guns, handcuffs and batons shall not be carried or used by NROs.
3. Upon completion of required training, NROs may be issued an approved chemical agent for defensive purposes.
4. If an NRO uses a chemical agent, the NRO shall notify the local DNR conservation officer or other licensed peace officer as quickly as possible and complete an Incident Report in accordance with applicable department policies and procedures.

H. Pursuit of Motor Vehicles:

1. NROs shall not perform pursuits of motor vehicles.

I. Emergency Vehicle Use:

1. NROs shall not use red lights and sirens for law enforcement purposes.
2. NROs may operate emergency vehicles and use flashing yellow lights in the front and flashing red lights in the rear to warn others of hazards in accordance with Minnesota Statutes § 169.59, Subd. 4.

J. Emergency Situations:

1. Emergencies are sudden and unexpected occurrences that require immediate action. In all situations good judgment and discretion should be used.
2. When emergencies arise, the local DNR conservation officer or other licensed peace officer or trained emergency personnel should be notified as quickly as possible to respond to the scene.
3. If an emergency requires the NRO's involvement, the NRO shall respond in a reasonable manner and within the scope of the NRO's employment.



K. Uniforms and Identification:

1. Except in an emergency, NROs shall be in full uniform, prominently displaying a badge, or wearing an outermost garment distinctly identifying themselves as an NRO when taking any enforcement action. Uniforms shall be designed in compliance with Minnesota Statutes § 626.88 and Operational Order Number 33.
2. NROs shall not identify or represent themselves as a DNR conservation officer, police officer, deputy, sheriff, or other licensed peace officer.
3. NROs shall not utilize their uniforms or credentials while off duty or beyond their scope of authority.

L. Supervision:

1. Normal day-to-day supervision of designated NROs shall be the responsibility of the appropriate division supervisor. All complaints of employee misconduct as an NRO shall be made in accordance with Department policies and procedures. Complaints of employee misconduct in connection with an NRO's use of enforcement authority shall be investigated in accordance with Operational Order Number 108.
2. Copies of citations and written warnings issued by an NRO shall be processed according to each division's NRO directive and a copy shall be sent to the regional law enforcement office in the region in which the citation or warning was issued.

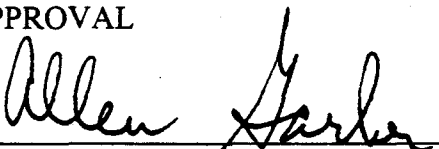
M. Delegation Orders:

1. Any necessary delegation order will be requested through the Assistant Commissioner for Operations.
2. Upon review and approval by the Assistant Commissioner for Operations, requested delegation orders will be processed in the appropriate manner.

N. Redesignation :

1. All current Level II Enforcement Officers are redesignated as Natural Resource Officers.

APPROVAL

  
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Allen Garber, Commissioner

Date: 1/31/02



**Minnesota Department of Natural Resources  
Division of Wildlife**

**Date: February 15, 2002**

**Natural Resource Officer Directive**

Certain personnel within the Division of Wildlife will be assigned limited law enforcement authority. Enforcement authority will only be granted to individuals who have completed the requirements of Operational Order number 94 and other requirements contained in the NRO manual and other Division or Department documents. This authority will be limited to the statutes and rules listed below. Locations where these can be enforced will be limited as noted.

**Outdoor Recreation Areas**

Minn. Stat. §§ 86A

**Location**

The Red Lake, Roseau River, Thief Lake, Mille Lacs, Lac qui Parle, Talcot Lake, Whitewater, and Carlos Avery Wildlife Management Areas; all other Wildlife Management Areas in the Baudette, Karlstad, and Thief River Falls wildlife work areas; and other Wildlife Management Areas as assigned.

**Wildlife Management**

Minn. Rules 6230  
(subject to Operational Order  
No. 94 restrictions)

**Location**

The Red Lake, Roseau River, Thief Lake, Mille Lacs, Lac qui Parle, Talcot Lake, Whitewater, and Carlos Avery Wildlife Management Areas; all other Wildlife Management Areas in the Baudette, Karlstad, and Thief River Falls wildlife work areas; and other Wildlife Management Areas as assigned.

**Game and Fish Laws**

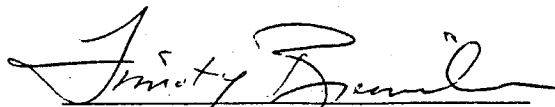
Minn. Stat. §§ 97A, 97B, 97C  
(subject to Operational Order  
No. 94 restrictions)

**Location**

The Red Lake, Roseau River, Thief Lake, Mille Lacs, Lac qui Parle, Talcot Lake, Whitewater, and Carlos Avery Wildlife Management Areas; all other Wildlife Management Areas in the Baudette, Karlstad, and Thief River Falls wildlife work areas; and other Wildlife Management Areas as assigned.

**Division of Wildlife Natural Resource Officer Coordinator**

The Wildlife Operations Manager is the Wildlife Natural Resources Officer Coordinator and is responsible for compliance with all requisite procedures.

  
Director, Division of Wildlife



**Minnesota Department of Natural Resources  
Division of Forestry**

**Date: February 19, 2002**

**Natural Resource Officer Directive**

Certain personnel within the Division of Forestry will be assigned limited law enforcement authority. Enforcement authority will only be granted to individuals who have completed the requirements of Operational Order #94 and other requirements contained in the Natural Resource Officer manual and other Division or Department documents. This authority will be limited to the statutes and rules listed below. Locations where these can be enforced will be limited as noted.

Responsibility	Topic Area	Location
Minn. Stat. §§ 88.01 to 88.22	Wildfire	Statewide on state and private lands
Minn. Stat. §§ 88.641 to 88.648	Decorative trees	Statewide on state and private lands and public highways
Minn. Stat. §§ 90.061	State appraiser	Statewide on state and private lands
Minn. Stat. §§ 90.251	Timber scaling	Statewide on state and private lands
Minn. Stat. §§ 90.301	Timber trespass	Statewide on state and private lands
Minn. Rules 6100.0100 to 6100.2400	Use of state parks and forest lands	Statewide on all forestry administered lands
Minn. Rule 6102.0010	Vehicle decals	Statewide on all forestry administered lands
Minn. Rule 6102.0040	Vehicle equipment	Statewide on all forestry administered lands
Minn. Rule 6102.0050	Vehicle traffic	Statewide on all forestry administered lands
Minn. Stat. §§ 85.40-85.45	Cross country ski	Statewide on all forestry administered lands

The Division of Forestry NRO Coordinator shall be the Division of Forestry Enforcement Program Coordinator.



M. R. Carroll  
Director, Division of Forestry



**Minnesota Department of Natural Resources  
Division of Parks and Recreation**

**Date: 7/3/02**

**Natural Resource Officer Directive**

Certain personnel with the Division of Parks and Recreation will be assigned limited law enforcement authority. Enforcement authority will only be granted to individuals who have completed the requirements of Operational Order number 94 and other requirements contained in the NRO enforcement manual and other Division or Department documents. This authority will be limited to the statutes and rules listed below. Locations where these can be enforced will be limited as noted.

<b>Responsibility</b>	<b>Topic Area</b>	<b>Location</b>
Minn. Stat. § 85.052	Special uses of state parks	All lands within state parks, state recreation areas, state wayside areas.
Minn. Stat. § 85.053	State park permits	All lands within state parks, state recreation areas, state wayside areas.
Minn. Stat. § 85.054	State park permits exemptions	All lands within state parks, state recreation areas, state wayside areas.
Minn. Stat. § 85.055	State park permit fees	All lands within state parks, state recreation areas, state wayside areas.
Minn. Stat. § 85.20	Violations of rules, littering	All lands within state parks, state recreation areas, state wayside areas.
Minn. Stat. § 85.40 – 85.45	User fees	All lands within state parks, state recreation areas, state wayside areas.
Minn. Rules § 6100.0100 - 6100.2400	Use of state parks and forest areas.	All lands within state parks, state recreation areas, state wayside areas. Also forest campgrounds and other recreation areas as assigned.
Minn. Stat. § 624.20-21	Fireworks and Sparklers.	All lands within state parks, state recreation areas, state wayside areas. Also forest campgrounds and other recreation areas as assigned.

The Natural Resources Officer Coordinator within the Division of Parks and Recreation shall be the Operation Manager.



Director, Division of Parks and Recreation





**Minnesota Department of Natural Resources  
Division of Trails and Waterways**

**February 11, 2002**

**Natural Resource Officer (NRO) Directive**

Certain personnel within the Division of Trails and Waterway (TAW) will be assigned limited law enforcement authority. Enforcement authority will only be granted to individuals who have completed the requirements of Operational Order Number 94 and other requirements contained in the NRO manual and other Division or Department documents. This authority will be limited to the statutes and rules listed below. Locations where these can be enforced will be limited as noted.

**State Forest Lands**

Minn. Rules 6100.0100 to 6100.2400  
Minn. Rule 6102.0010  
Minn. Rule 6102.0040  
Minn. Rule 6102.0050  
Minn. Stat. §§ 85.40 thru 85.45

**Location**

Statewide on all forestry administered lands.  
Statewide on all forestry administered lands.  
Statewide on all forestry administered lands.  
Statewide on all forestry administered lands.  
Statewide on all forestry administered lands.

**Off-Highway Vehicle  
Recreation Areas**

Minn. Rules 6100.0100 to 6100.2400  
Minn. Rule 6102.0010  
Minn. Rule 6102.0040  
Minn. Rule 6102.0050

**Location**

Statewide on all off-highway vehicle recreation areas.  
Statewide on all off-highway vehicle recreation areas.  
Statewide on all off-highway vehicle recreation areas.  
Statewide on all off-highway vehicle recreation areas.

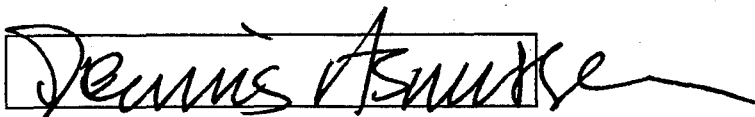
**Wildlife Management Areas**

Minn. Rule 6102.0010  
Minn. Rule 6102.0040  
Minn. Rule 6102.0050

**Location**

Statewide on all consolidated conservation wildlife mgnt areas.  
Statewide on all consolidated conservation wildlife mgnt areas.  
Statewide on all consolidated conservation wildlife mgnt areas.

Division Trails & Waterways NRO Coordinator: Natural Resource Area Supervisor TAW



Director, Division of Trails and Waterways

