



A cleaner environment, naturally.

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Conservation Technical Assistance Programs Division  
US Department of Agriculture  
Natural Resources Conservation Service  
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RE: Docket Number NRCS-IFR-08010

The South Dakota Association of Conservation Districts appreciates the opportunity to comment on the State Technical Committee draft regulation published in the Federal Register on November 25, 2008.

The Association and its 69 conservation district members actively participate in South Dakota's State Technical Committee as outlined in the Federal Register. We look forward to continuing what we feel is a successful process in South Dakota. Our process may be different slightly different than the process in other states but it is successful. We especially appreciate the use of subcommittees within the State Technical Committee to address specific programs. The subcommittees are diligent about fully addressing the issues related to a specific program and then reporting back to the full State Technical Committee the results of their discussion and their recommendations for further action. The State Technical Committee and the program-specific subcommittees take seriously the recommendations and suggestions offered by the Local Work Groups. Key to the success of this entire process is the open flow of communication between all entities and levels of activity. It appears the communication flows more easily when recommendations are accepted; however, we encourage State Conservationists to communicate to the Local Work Groups when their recommendations are not accepted or pursued.

For years now, South Dakota's conservation districts have convened Local Work Groups to gather input on resource concerns and solutions. Even though these Local Work Groups have operated under the FACA requirements, we've invited local stakeholders to attend the meetings to provide non-voting information and feedback. The changes in the 2008 Farm Bill will allow us to continue to bring together the governmental entities and stakeholders with, this time, all at the table being able to impact the recommendations and priorities. We applaud this change and look forward to implementing it further.

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Our local work groups operate on the conservation district level and then come together on a watershed basis to share their priorities and recommendations. This has worked extremely well and we hope can continue in the future.

As to the recommendations on the publication of meeting notices and agendas for the Local Work Groups and State Technical Committees, we use a variety of options on both the state and local level, as appropriate. We use local, regional and state newspapers; NRCS, conservation, and stakeholder websites; mass-e-mails to those who have expressed an interest or attended previous meetings; local radio and/or television public service announcements; and inclusion in commodity, conservation, environmental or community print or electronic media releases. We recommend these methods continue to be available.

Regarding the interaction of the Local Work Group with the State Technical Committee and with NRCS, we do not feel it appropriate to expect the State Conservationist to be present at all Local Work Group meetings. We believe NRCS should be represented by NRCS line officers, the District Conservationist at a minimum. As subcommittees of the State Technical Committee, the Local Work Groups (as written in the Federal Register notice) would provide a report to the State Conservationist and a summary of all Local Work Group meetings would be presented during the State Technical Committee. The written report should be prepared by the conservation district who convened the Local Work Group. If the conservation district did not convene the Local work Group, the State Conservationist's designee should prepare the written report.

The State Conservationist needs to dialogue with the Local Work Group regarding the Local Work Group's priorities and recommendations. We believe the Local Work Group should receive feedback both if their recommendations are accepted and if they are not incorporated into USDA's program delivery system. Positive and negative feedback can substantiate and encourage the Local Work Groups to continue developing local solutions to natural resources issues. Locally led conservation works well with open and frank two-way communication, not in a vacuum of information.

Thank you for the opportunity to provide input on this regulation. We are available to answer any specific question.

Sincerely,



Irwin Symens, President

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