



MISSOURI DEPARTMENT OF CONSERVATION  
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# Fax

To: USDA - NRCS - Conservation Technical Assistance Programs Date: 1-26-09  
 Fax: Division From: MO Dept. of Conservation  
 Re: Federal Register Comments Total pages including cover: 3

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● Comments:

Docket Number NRCS-IFR-08010.

Please See Comments from MO Dept. of Conservation

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# MISSOURI DEPARTMENT OF CONSERVATION

## Headquarters

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JOHN D. HOSKINS, Director

January 23, 2009

Conservation Technical Assistance Programs Division  
 US Department of Agriculture  
 Natural Resources Conservation Service  
 Room 6015-S  
 1400 Independence Avenue, S. W.  
 Washington, DC 20250-2890

Dear Director:

The Missouri Department of Conservation is a state agency responsible for the management of fish, forest and wildlife resources in the state of Missouri. The Department provides technical assistance to USDA-NRCS for the implementation of Farm Bill conservation programs. We offer the following comments for Docket Number NRCS-IFR-08010, State Technical Committee, posted in the Federal Register:

- 1) Rule page 71524, Summary of Provisions: "NRCS invites comments regarding the interaction of Local Working Groups with State Technical Committees and with NRCS at both the local and State levels. The NRCS also invites comments regarding the State Technical Committee review of whether Local Working Groups are addressing the priorities established by the State Technical Committee."**

We agree with requiring a review of Local Working Group priorities to ensure that state priorities are being addressed.

We also agree with the rule in 610.25 (b) requiring Local Working Groups to be composed of a cross section of conservation and agriculture interests to best insure that ALL conservation issues are addressed.

Not all local working groups in our state are currently composed of such a cross section, resulting in a lack of due consideration for all resources in some counties. Such a requirement can build good will among participants and assist in addressing issues before they need regulatory intervention.

- 2) In 610.22 state technical committee membership (a)(8), the statement that agricultural producers need to have some level of conservation expertise was removed.**

Recommendation:

Revise 610.22 (a)(8) as follows: "State Technical Committees shall include agricultural producers with demonstrable expertise working with Farm Bill conservation programs, ... ." This language is consistent with other elements of the same section and needed to aid in committee deliberations.

COMMISSION

DON R. JOHNSON  
Festus

CHIP McGEEHAN  
Marshfield

LOWELL MOHLER  
Jefferson City

BECKY L. PLATTNER  
Grand Pass

**3) In 610.22 state technical committee membership (b)**Recommendation:

Suggest adding USFWS as an example. Their participation is needed on regular basis to ensure that agriculture and conservation interests are informed about potential issues with federal listed species. In addition, several USFWS private land programs are complementary of USDA programs.

**4) In 610.22(d) "Decisions of the State Conservationist concerning membership on the committee are final and not appealable to any other individual or group within USDA."**Recommendation:

This statement should be further clarified by inserting the word 'individual' before the word 'membership' as it currently gives the impression that it pertains to the entire membership of the committee. This will be difficult for a State Conservationist because membership is fluid with new farmers/ranchers, new landowners, new industries and agribusiness interests, as well as new wildlife and conservation groups emerging.

**5) 610.24 responsibilities of state technical committees- within (c) "state technical committee shall review whether local working groups are addressing state priorities."**Recommendation:

Add "the State Conservationist shall address the concerns of the State Technical Committee" to ensure that follow up is always conducted.

**6) 610.24 Responsibilities of State Technical Committees (a)**Recommendation:

Add the following to the list of recommendations to be addressed by the State Technical Committee:

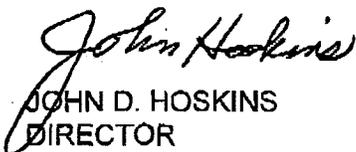
- Conservation practices and practice standards
- State-specific program policies

**7) In 610.25 subcommittees and local working groups (a)**Recommendation:

To ensure that all state and local technical working group members have the opportunity to participate, if desired, we suggest adding a statement requiring the State Conservationist to open the invitation to participate in subcommittees to the entire State Technical Committee.

The Missouri Department of Conservation appreciates the opportunity for comment. If you require additional information, please contact Private Land Programs Supervisor, Bill White at 573-522-4115, Ext. 3512.

Sincerely,

  
JOHN D. HOSKINS  
DIRECTOR

c: Private Land Programs Supervisor Bill White