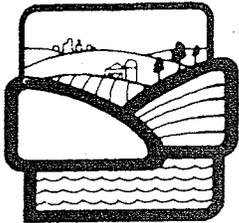


Rec'd 1/8/2009



WINNEBAGO COUNTY
**SOIL AND WATER
CONSERVATION DISTRICT**

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December 16, 2008

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

RE: Docket Number NRCS-IFR-08010

The Winnebago County Soil and Water Conservation District (SWCD) appreciates the opportunity to comment on the State Technical Committee regulation that was published in the Federal Register on November 25, 2008. Established under state law, conservation districts are local units of state government charged with carrying out programs for the protection and management of natural resources at the local level. Conservation districts work with federal, state, and other local agencies to provide programs and technical assistance to landowners and other partners to address natural resource issues. The Winnebago County SWCD is located in the north central region of Illinois, about 90 miles northwest of Chicago.

The working relationship between Soil and Water Conservation Districts and the Natural Resource Conservation Service is a mutual and beneficial association. The work we do at the local level relies on the technical support of NRCS, and the program delivery of many USDA programs often relies on the work of the SWCD's. The one aspect that District employees and their Board of Directors can "bring to the table" is the formation and utilization of Local Work Groups.

The Local Work Group processes have been used for Conservation Title programs since the 1996 Farm Bill and have been implemented in varying degrees. The process of locally identifying important resource issues and addressing them with federal, state and local and private resources has been going on since the formation of districts. The programs provided by the Conservation Title and the local work group process is a backbone of locally led conservation.

The state of Illinois encouraged local offices and SWCD's to convene these Local Work Groups last spring to assess local needs, priorities and program shortfalls. Northeastern Illinois is a rapidly urbanizing area with the City of Chicago and its suburbs continuing to grow and expand. Priorities in this region include: Protection and enhancement of Natural Resources, including Water Resources; and Farmland and Open space Preservation.

Working together to assure that the technical solutions used to resolve resource concerns actually work in the area and providing localized options are critical components of achieving the full conservation impacts and environmental benefits. Regardless of the specific structure of the committee, we feel it is vital to have communication between the State Conservationist, State Technical Committee and Local Work Groups. Where a State Technical Committee or a Local Work

Group provides recommendations on priorities or practices that are not accepted or pursued by the State Conservationist, there must be communication as to why these suggestions were not accepted. We believe that this communication will improve the recommendation process and the value of the work of the Local Work Groups and the State Technical Committee.

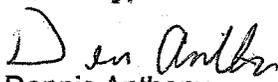
The commitment to this Local Work Group process needs to continue. Local Work groups should meet once per year at a minimum. The publication of meeting notices and agendas for the Local Work Group and the State Technical Committee include a variety of options that can be utilized at both the state and local level, depending upon availability, including such things as:

- Local newspaper and newsletters
- SWCD websites, or State Association websites
- Broadcast on local Farm Radio or other local news outlets
- Contacting past attendees and those that have expressed interest local conservation needs

Regarding the interaction of the Local Work Group with the State Technical Committee and with NRCS, we do not feel it is appropriate to expect the State Conservationist to be present at all Local Work Group meetings. We believe that NRCS should be represented by NRCS office personnel, the District Conservationist at a minimum, and the Area Conservationist if possible. As subcommittees of the State Technical Committee, the Local Work Groups should provide a report to the Area Conservationist and/or State Conservationist, and a summary of all Local Work Group meetings would be presented during the State Technical Committee.

Additionally, there needs to be communication from the State Conservationist regarding the priorities established by the Local Work Group and the report submitted. If recommendations from the Local Work Group are not incorporated into the USDA program delivery system, the NRCS officers should inform the members of the Local Work Group as to the reasoning behind the decision. We believe that proper communication in this area will also help to address provisions in the 2008 Farm Bill regarding the State Technical Committee review of whether Local Work Groups are addressing the priorities established by the State Technical Committee. If the Local Work Group priorities and the State Technical Committee recommendations are substantially different, there must be communication from the State Technical Committee and the State Conservationist as to the reasoning for their decision. The Winnebago County SWCD appreciates the opportunity to provide input on this regulation.

Sincerely,


Dennis Anthony
Executive Director