



National Association of Conservation Districts

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 National Association of Conservation Districts (NACD) appreciates the opportunity to comment on the State Technical Committee regulation that was published in the Federal Register on November 25, 2008. NACD represents the nation's 3000 conservation districts and their governing boards. 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.

State Conservation District Associations participate in the State Technical Committee as outlined in the law and the *Federal Register* Proposal and we look forward to continuing that working relationship at the state level. We understand that the State Technical Committee may operate slightly differently in each state, and have reports of successful approaches that include the creation of subcommittees to address individual conservation programs. This approach allows for work to progress and those interested in specific programs to work through the subcommittee. 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 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. With the new Farm Bill provisions, what in the past have been two groups -- the

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Local Work Group and the Stakeholder Input Group can be combined into one Local Work Group, convened by the local conservation districts, including all government officials and local stakeholders. 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. Software and national policies must provide enough flexibility and transparency to allow for options to be available based on local needs while assuring that program and funding accountability is maintained.

NACD recommends that local conservation districts convene Local Work Groups. NRCS has established this process through past guidance and we feel it should continue under these new authorities and regulations. Conservation Districts have a history of convening Local Work Groups and undertaking the locally led planning process in their communities. The changes in the 2008 Farm Bill combine these two processes into one effort and local conservation districts are uniquely positioned to undertake the process of bringing everyone together to provide input. In areas without a conservation district, or when a conservation district relinquishes its leadership of the local work group, the NRCS State Conservationist should be able to designate a leader of the Local Work Group.

Local work groups should be on the conservation district level, or as appropriate within the state. We understand that some states have been organizing on a watershed, basin or landscape level to more effectively address the resource priorities within the state. Local Work groups should meet once per year at a minimum.

As to the recommendation on the publication of meeting notices and agendas for the Local Work Group and the State Technical Committee there are a variety of options that can be utilized at both the state and local level, depending upon availability. Our recommendations include:

- Local or state newspaper as appropriate
- NRCS website
- Conservation District website, or State Association website (as available)
- Broadcast on local Farm Radio or other local news outlets
- Email past attendees and those that have expressed interest to the State Conservationist
- Request for publication in commodity, conservation, environmental or other community or state newsletters/magazines

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 line officers, the District Conservationist at a minimum and the Area Conservationist if possible. 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.

Regarding the report of the Local Work Group, we recommend that the Conservation District, as the convener of the Local Work Group provide a report to the District Conservationist, the State

Conservationist, and the State Technical Committee. Where the Conservation District is not the convener, the designee by the State Conservationist should provide the report.

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 line officers including the District Conservationist, the Area Conservationist, or the State Conservationist, 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.

NACD appreciates the opportunity to provide input on this regulation and would be happy to address any questions.

Sincerely,



John Redding
President

Attachment -- Building Your Local Work Group