January 26, 2009

Conservation Technical Assistance Programs Division
U.S. Department of Agriculture
Natural Resources Conservation Service
1400 Independence AVE, SW
Room 6015-S
Washington, DC 20250-2890

RE: Docket Number NRCS-IFR-08010
State Technical Committees
Federal Register Vol. 73, No.228 at pp. 71521-71526 (Nov. 25, 2008)

Dear Sir or Madam:

The Izaak Walton League of America is a private, non-profit conservation organization that for more than 85 years has supported strong federal conservation policies on private lands, especially agricultural lands. Our nationwide membership lives, works and recreates in rural communities. We have a decades-long record of support for farm families and collaborative efforts to achieve conservation that sustains agriculture, habitat, and all natural resources.

IWLA Comments: Membership

The Interim Final Rule specifies that 7 CFR § 610.22(a) lists specific State technical Committee membership as revised by the 2008 Farm Bill Section 2711. We note that the language is specific in naming representatives that "shall" serve, but we want to further emphasize Section 610.22(b) stipulated in the IFR. This section specifies that the State Conservationist, "will invite other relevant Federal agencies, and persons knowledgeable about economic and environmental impacts of conservation techniques and programs to participate as needed."

In light of Sec. 610.22(b) we request that USDA require by directive that USDA State Conservationists issue invitations to U.S. Fish and Wildlife Service, USDA Rural Development; the U.S. Environmental Protection Agency; the Bureau of Land Management; the Bureau of Indian Affairs; the U.S. Geological Survey; the Bureau of

Reclamation; and the Army Corps of Engineers. Each of these agencies is directly involved in practices and regulations that intersect with and impact natural resource conservation, agriculture, and rural communities.

The directive should further provide means by which agencies, organizations, and individuals may formally submit notice of interest to receive an invitation to the State Conservationist.

IWLA Comments: Meetings

The Interim Final Rule includes descriptions in 7 CFR § 610.23(b) and (c) describing publication of standard operating procedures and practices for providing public notice of State Technical Committee and Local Working Group meetings.

We request that the notice of State Technical Committee, Subcommittee and Local Working Group meetings should be made to the public in advance of the meetings, and published on the NRCS web site, and that means be provided to interested parties for subscribing to email or other services that distribute such notices, similar to subscription services in currently place for other USDA publications and notices.

Additionally, USDA should maintain notices of upcoming meetings, minutes of past meetings, a current list of State Technical Committee, Subcommittee, and Local Working Group members, and instructions for requesting a seat on the State Technical Committee, a Subcommittee or Local Working Group on the NRCS web site for each State.

IWLA Comments: Responsibilities

The Interim Final Rule specifies that 7 CFR § 610.24(a) lists specific programs under Title XII of the Food Security Act of 1985. As it stands the IFR is in error in not including the Cooperative Conservation Partnership Initiative. However, we join others in requesting that the sentence listing the specific programs be replaced with the following text:

(a) Each State Technical Committee established under this subpart shall meet on a regular basis, as determined by the State Conservationist, to provide information, analysis, and recommendations to appropriate officials of the Department of Agriculture who are charged with implementing and establishing priorities and criteria for natural resources conservation activities and programs under Title XII of the Food Security Act of 1985, and such other conservation programs and issues as may be appropriate to the committee's expertise.

Further, we request the specific inclusion within the State Technical Committee responsibilities the responsibility to provide information, analysis, and recommendations to appropriate officials of the Department of Agriculture who are charged with implementing and conducting reviews of good faith determinations related to highly erodible land conservation and wetland conservation as specified in Section 2002 and Section 2003 of the Food Conservation and Energy Act of 2008.

Conclusion:
The Izaak Walton League of America supports the interim final rule with the changes and clarifications we have detailed above. We thank you for your consideration of these comments. Please direct any inquiries regarding this submission to Brad Redlin, IWLA Agricultural Program Director, bredlin@iwla.org, (651) 649-1446 ext. 13.

Sincerely,

Brad Redlin
Izaak Walton League of America
Agricultural Program Director
1619 Dayton AVE, STE 202
St. Paul, MN 55104