



JUN 05 REC'D

June 3, 2014

Brandon Butler
Executive Director
Conservation Federation of Missouri
728 W. Main Street
Jefferson City, Missouri 65101-1559

Dear Mr. Butler:

Thank you for contacting our office in reference to the Conservation Federation of Missouri 2014 Resolutions. We value the opportunity to review and provide comments on these resolutions. Missouri Natural Resources Conservation Service (NRCS) responses are as follows:

a. **Habitat Requirements in Farm Conservation Plans:** The 2014 Farm Bill contains new language requiring producers to be compliant with Highly Erodible Land (HEL) and Wetland Conservation provisions of the Food Security Act of 1985 in order to be eligible for subsidized crop insurance benefits. In order to meet HEL compliance provisions, producers must be actively applying a conservation system that does not exceed established soil loss limits. The HEL provisions do not provide any wildlife habitat requirements. The Department of Agriculture (USDA) cannot require producers to meet requirements that are not established in the Food Security Act of 1985 and cannot require them to address other resource concerns. Therefore, NRCS cannot revise requirements for landowner conservation plans to include wildlife habitat concerns in order to meet HEL compliance.

NRCS addresses wildlife habitat concerns with the producer in all comprehensive conservation planning and for USDA financial assistance programs. However, conservation plan development is always directed toward the goals of the producer. If the producer has any interest in improving wildlife habitat, NRCS will, and does, work with the producer to implement practices that will achieve those habitat improvements.

b. **Development of a Native Warm-Season Grass Program for Agricultural Grazing:** NRCS recognizes the importance of promoting native warm-season grasses when working with livestock grazing operations. Native warm-season grasses provide many benefits for domestic livestock, pollinators, and wildlife species as well as providing soil health and water quality benefits. The benefits that they provide have been under-appreciated, and NRCS is committed to working with the Missouri Department of Conservation and others in promoting native warm-season species in its financial assistance programs.

For the past few years, Missouri NRCS has been required to utilize a regionalized payment schedule in offering financial assistance through its USDA programs. These payment schedules are developed over a five-state region and are approved through a national process. There is currently no opportunity for the state to deviate from this process or from specific payment schedules.

A regional payment schedule is available that was specifically developed for establishment of native warm season grasses. This payment schedule does include a component for foregone

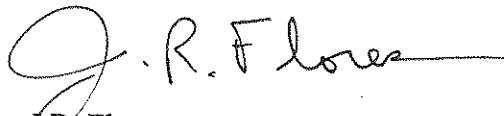
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income to address the lost income that is usually realized during the establishment period. The costs for some specific components may appear to be low, but those component costs were assigned nationally and cannot be modified at the state level.

For its part, Missouri NRCS will forward the concerns of the Federation to the national payment schedule team leader. Missouri NRCS will also continue promoting native warm season species to producers who are applying for USDA financial assistance and for Missouri State Cost Share Program assistance.

Thank you again for contacting our office and providing us the opportunity to submit our comments on these resolutions. If you have any questions please contact Dwaine Gelnar, State Resource Conservationist, at (573) 876-0908.

Sincerely,

A handwritten signature in black ink that reads "J.R. Flores". The signature is written in a cursive style with a long horizontal line extending to the right.

J.R. Flores
State Conservationist

cc:
Dwaine Gelnar, State Resource Conservationist, NRCS, Columbia, Missouri

Missouri Department of Transportation
David B. Nichols, Director

573.751.2551
Fax: 573.751.6555
1.888.ASK MODOT (275.6636)

May 7, 2014

Conservation Federation of Missouri
Brandon Butler, Executive Director
728 West Main St.
Jefferson City, MO 65101-1559

Dear Mr. Butler:

Thank you for the resolution provided with your letter of April 23, 2014. The resolution suggests that MoDOT use a minimum of 30 percent diversified seeding mixtures that are required for pollinator plantings funded with state and/or federal funds.

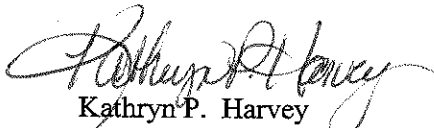
MoDOT understands the importance of pollinators for agriculture and supports diverse roadsides. Native plants, including wildflowers, have been recommended on construction projects for several years. We strive to have roadsides that are safe, provide long-term protection for the pavement and are visually appealing.

In 2012, in cooperation with the St. Louis Zoo, a demonstration garden of pollinator plants was installed at the Highway Gardens on the Missouri State Fairgrounds in Sedalia. The garden includes a wide variety of flowering plants and also educational signs illustrating the importance of pollinators.

MoDOT is again partnering with the St. Louis Zoo and also the Missouri Department of Agriculture on the Roadside Pollinator Project. The project fosters pollination by planting native plants along roadsides near crops that require pollination. We recently received a \$50,000 grant from the Robert J. Trulaske, Jr. Family Foundation to support this project.

MoDOT will continue to support activities that promote pollinators where appropriate and economically feasible. Thank you for your interest in Missouri's roadsides.

Sincerely,


Kathryn P. Harvey
Assistant Chief Engineer



Our mission is to provide a world-class transportation experience that delights our customers and promotes a prosperous Missouri.

www.modot.org



MISSOURI DEPARTMENT OF CONSERVATION

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ROBERT L. ZIEHMER, Director

JUL 16 REC'D

July 11, 2014

Mr. Brandon Butler, Executive Director
Conservation Federation of Missouri
728 W. Main Street
Jefferson City, MO 65101

Dear Mr. Butler:

The resolutions that pertain to the Missouri Department of Conservation (Department), adopted at the 2014 annual meeting of the Conservation Federation of Missouri (CFM), have been considered by staff. In response, we submit the following comments:

RESOLUTION NO. 1 – CFM SUPPORT FOR PROVIDING ADEQUATE RESTROOM FACILITIES FOR STATE AND FEDERAL PUBLIC LAND

CFM urges state and federal resource agencies to make budgeting for these amenities a priority as these structures play such an important role in the visitor experience.

RESPONSE: The Missouri Department of Conservation continues work to maintain the extensive infrastructure portfolio that helps make conservation a success in Missouri. The Department recognizes the role restroom amenities have in the visitor experience as well as resource management. The FY2015 Capital Improvements expenditure plan has funds identified to facilitate restroom updates and improvements at areas across Missouri. This is consistent with the five prior expenditure plans and reflects the Department's overall commitment to maintaining the entire infrastructure portfolio that serves conservation.

RESOLUTION NO. 6 – CFM MEMBERS IN FISHING EDUCATION

CFM encourages its members to become certified fishing instructors and help with the mission of outdoor education.

RESPONSE: The Missouri Department of Conservation recognizes the important role that experienced anglers play in mentoring new anglers and encourages anyone interested in fostering the next generation of anglers to become a Department-certified volunteer fishing instructor.

In order to provide fishing instruction by experienced anglers, the Department has developed the Discover Nature – Fishing (DN-F) program. The DN-F program uses fishing volunteers to increase citizen participation in fishing by increasing participants' knowledge and skill levels, recruiting new participants, and empowering participants to continue fishing activities on their own.

DN-F provides a series of four separate lessons to help youth and families gain skills and confidence to go fishing on their own. Each of the four, two-hour lessons is followed by hands-on fishing for participants to put their newly learned skills to work.

COMMISSION

DON C. BEDELL
Sikeston

JAMES T. BLAIR, IV
St. Louis

MARILYNN J. BRADFORD
Jefferson City

DAVID W. MURPHY
Columbia

Fishing volunteers can teach a single lesson or multiple lessons. Training will be provided by the Department. Anyone interested in becoming a DN-F volunteer should contact their local Department office or check the web at www.mdc.mo.gov for more information.

RESOLUTION NO. 7 – FUNDING FOR FISHING CLUBS

CFM requests that the Missouri Department of Conservation create grants for such things as equipment purchase, travel expense, and instruction to be awarded to high schools that create fishing clubs.

RESPONSE: The Missouri Department of Conservation recognizes the importance of recruiting and retaining anglers by working with partnering individuals, groups, and agencies that share in this mission. During the busy teenage years, fishing is often replaced by other activities that offer new challenges and excitement. Supporting the development of student fishing clubs will be instrumental in recruiting and retaining new anglers to the sport by engaging youth in fishing.

Examples of our current efforts include:

- Providing paid staff and trained fishing volunteers to assist schools and organized clubs with fishing programs.
- Offering transportation reimbursement grants that schools can apply for through their regional office.
- Providing free fishing equipment to schools and other youth organizations through our fishing equipment long-term loaner program.

Youth involved in fishing have a better chance of developing an appreciation for the outdoors and conservation. Educational programs on angling are currently being delivered through the Fisheries, Outreach and Education, and Protection divisions. Additional programs are being developed with hopes of introducing a consistent angling education program statewide to families, youth leaders, schools, and clubs.

RESOLUTION NO. 8 – DESE TEACHING CERTIFICATION REQUIREMENTS

CFM recommends that the Missouri Department of Elementary and Secondary Education installs a component to the teaching certificate requiring that educators receive training in Discover Nature Schools or a certification in either Project Learning Tree, Project Wet, Project Wild, Project Flying Wild, or a similar conservation related curriculum.

RESPONSE: The Missouri Department of Conservation recognizes the importance of conservation education as a vital component to the long-term sustainability of a community and recognizes the community's youth are educated by the current elementary and secondary institutions in the state.

The Department appreciates the acknowledgement by the Committee of its Discover Nature Schools (DNS) educational units as being examples of hands-on, cross-disciplinary, active, exciting, outdoor-focused, conservation education. The Department recognizes that youth and the community benefit from such educational approach.

The Missouri Department of Elementary and Secondary Education (DESE) supports and promotes to teachers the Department's DNS science/conservation education units. DESE representatives express their support and promote the Department's DNS educational units at the annual Interface A (elementary) and B (middle and high school) conferences for science and math teachers each February. DESE representatives and Outreach and Education Division staff work closely to ensure that DNS content is sound, relevant to teachers, and maintains strong content alignment with state science standards and expected competencies.

The Department recognizes the need to incorporate training in DNS, the Projects, and other relevant conservation-related curriculum into colleges and universities offering teaching certificates and degrees. Three years ago, Department Outreach and Education Division staff in the Southwest Region began designing and developing a conservation education certification with Missouri State University. The resulting certification is referred to as Discover Nature – Teachers (DN-T). DN-T is a two-year conservation education certification that includes training in DNS units: Nature Unfolds (grades K-2); Nature Unleashed (grades 3-5); Conserving Missouri's Aquatic Ecosystems (grades 6-8); and Nature Unbound (grades 9-12). It also includes training in Project WILD, Flying WILD, Project WET, Project Learning Tree, and the Leopold Education Project. DN-T helps teachers to feel comfortable learning and teaching about nature in nature and helps them to gain a deeper understanding of how to use the outdoors as their classroom to improve student attention, behavior, and learning. Teachers are trained with the same hands-on, self-discovery, cross-disciplinary, outdoor-focused learning that they can then apply to their students.

As DN-T moves through its pilot phase in several branches of Missouri State University, more teachers will gain confidence teaching in the outdoors, and more students will gain a deeper understanding of natural science concepts and a greater appreciation for learning and being outdoors.

Discover Nature is a call-to-action for all Missouri citizens. Discover Nature Schools and Discover Nature – Teachers are the Department's formal education programs under this umbrella. These programs will grow competent educators and students who will gain high academic achievements. These educators and students will, in turn, become life-long conservationists and stewards of their communities, the natural world around them, and the fish, forest, and wildlife resources of the State.

RESOLUTION NO. 12 – HEALTH STUDY OF BOBWHITE QUAIL FROM AREAS WITH LOW POPULATION DENSITY

CFM recommends that the Missouri Department of Conservation implement a controlled study to determine the effect of disease and parasites on quail in Missouri.

RESPONSE: Recent work in other states in the bobwhite quail range has led hunters and biologists to consider the role that parasites and diseases may play in the population decline of the bobwhite in Missouri. While information regarding the presence/absence of disease and parasites is obtainable, in many cases we have no historic baseline data to which we can compare present rates of infection. Without baseline data, it will be difficult to know if present infection rates are "normal" and have been in place a long time, or if they are now higher and might in fact contribute to decreased populations.

Nevertheless, the Missouri Department of Conservation is committed to understanding the population dynamics of bobwhites in Missouri, and such information would be valuable. The Department will consider disease and parasite testing and monitoring as a means to better understand all the factors affecting bobwhite populations.

RESOLUTION NO. 13 – NEST PREDATOR STUDY

CFM recommends the Missouri Department of Conservation do a study on nest predation to determine the impact on quail populations.

RESPONSE: Ground nesting birds such as bobwhite quail are subject to nest predation by many predators, including raccoons, opossums, skunks, and snakes. Bobwhites have always experienced relatively high predation rates, and as a result have evolved high reproductive output to cope with predation loss. But in today's landscape with increasingly smaller and fragmented habitat patches in which to nest, nest predator search efficiency may be increased, resulting in higher losses of bobwhite nests.

Missouri Department of Conservation staff are presently engaged in a multi-year study on several areas in southwest Missouri to determine which management techniques produce the most bobwhites. Included in this study is an assessment of nest success related to habitat management practices used on our conservation areas and recommended to our landowner cooperators. Many of our Area Managers are focusing their management efforts at increasing and improving nesting and brood rearing habitat as a means to overcome predation losses. Department biologists will consider nest predation as they design habitat plans, and habitat factors such as buffer width and patch size will be considered for future study.

RESOLUTION NO. 14 – LACK OF QUAIL RESPONSE TO HABITAT WORK

CFM recommends that the Missouri Department of Conservation determine the reasons that habitat efforts have not led to significant population increases on Department Land including the Quail Emphasis Areas as well as on private land.

RESPONSE: The Missouri Department of Conservation shares CFM's concerns that quail management efforts have not always resulted in population increases. This observation has been noted throughout the bobwhite's range, and biologists from Missouri and many other states are engaged in efforts to determine why.

We believe that in many cases we now have isolated populations of quail that are more sensitive to population pressures than more widespread populations. This isolation is due to increasingly inhospitable conditions brought about through practices such as intensive row crop production, overgrazing, development, etc. that render vast acreages unusable by bobwhites. In addition, many parts of the state have undergone extreme weather events over the past 10 years, such as record rainfall during brood rearing, extreme cold, and persistent snow cover. But it is important to note that in many locations in Missouri, habitat work has produced significantly more quail than were produced on nearby areas without habitat enhancements. Work in Knox, Carroll, and Scott counties has yielded increased populations where habitat management over large landscapes meets the species' habitat needs.

The Department is also engaged in a multi-year research project in southwest Missouri to assess how various management practices drive reproductive output. Results of this study could change the way we manage public lands for bobwhites, as well as the recommendations we make to our private land cooperators. We will continue to investigate bobwhite response to management and strive to produce healthy populations.

RESOLUTION NO. 15 – DEVELOPMENT OF A NATIVE WARM-SEASON GRASS PROGRAM FOR AGRICULTURAL GRAZING

CFM encourages the Missouri Department of Conservation in cooperation with the Natural Resource Conservation Service and interested non-profit organizations to develop and promote a program with added incentives to already existing cost share programs to cover lost income during establishment, encouraging grazers to incorporate native warm-season grass species into their livestock production strategy.

RESPONSE: The Missouri Department of Conservation recognizes the value of native warm-season grasses to wildlife and livestock and has long encouraged producers to establish native forages. Native warm-season grasses do provide the benefits enumerated in Resolution 15, but the two to three year period before these grasses become optimally productive has served to limit landowner interest. Federal and State conservation programs for working grasslands have not proven sufficient to overcome the loss of forage and income during the shift from non-native to native warm-season forages.

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Department staff in Wildlife and Private Land Services divisions are working with partners to develop a short-term grassland deferment program to create optimal grassland wildlife habitat for a period of five years on enrolled acres, and to guarantee that 50-75% of enrolled acres remain in grass cover for an additional five years thereafter.

This program will encourage landowners to maintain and enhance existing grasslands, and to convert tall fescue pasture to well-managed, wildlife-friendly grasses. In addition to directly benefitting obligate prairie wildlife, this program will improve stream water quality by increasing the extent of well-managed grassland, reducing soil erosion, and improving soil water infiltration. Current objectives include deploying this practice within pilot geographies in 2015.

RESOLUTION NO. 16 – INCREASE OF COVER ON MDC QUAIL EMPHASIS AREAS (QEA's) AND OTHER STATE AREAS WITH POTENTIAL FOR BOBWHITE QUAIL POPULATIONS

CFM encourages the Missouri Department of Conservation to further increase the presence of native shrubby cover and high quality brood rearing and nesting cover on MDC grounds as outlined in the 2014 quail plan to meet the stated twenty percent habitat requirement of Bobwhite Quail.

RESPONSE: Research has demonstrated that bobwhites do best when low-growing, high stem density shrubby cover occurs over 5-20 percent of their home range. Within this range however, it should be noted that more is not necessarily better, and 10 percent brushy cover may be as suitable as 20 percent, assuming that other habitat requirements are met. This brushy cover is important for escape and loafing cover as well as thermal cover. It is rarely associated with nesting cover.

Most Missouri Department of Conservation staff with a strong quail management background believe that woody cover is sufficient in quantity on most Department areas managed for quail. We believe that the habitat factor limiting bobwhite increase is often a lack of suitable early successional brood habitat. Current research is exploring this concept and Department staff are engaged in managing for quail and other small game through practices such as prairie restoration, prescribed burning, row crop conversions to more productive habitat types, cover crops, edgefeathering, prescribed grazing, and invasive species control. The Department is committed to outstanding management of our conservation areas for wildlife, and quail and other small game are an important facet of that effort.

RESOLUTION NO. 18 – MISSOURI STATE PARK RANGER DAY

CFM encourages Governor Nixon and the Missouri State Legislature to recognize and proclaim World Ranger Day in Missouri.

RESPONSE: The Missouri Department of Conservation enthusiastically supports CFM's desire to have the State of Missouri recognize and proclaim World Ranger Day in Missouri. This resolution should, however, be forwarded on to the Missouri Department of Natural Resources as park rangers in Missouri are employed by that agency. The Department will do all it can to see these protectors of Missouri's State Parks are recognized for their efforts.

RESOLUTION NO. 23 – MISSOURI STATE AGENCIES AND CORPORATIVE AGENCIES SHOULD REQUIRE DIVERSIFIED PLANTS TO PROMOTE NATIVE POLLINATORS.

CFM suggests that all state and federal agencies use a minimum of 30 percent diversified seeding mixtures that are required for pollinators for plantings funded with state and/or federal funds.

RESPONSE: The Missouri Department of Conservation recognizes the importance of native pollinators for agricultural products, wildlife populations, and natural community conservation. On average, over the past 3 years the Department has actively managed approximately 77,000 acres of savanna, woodland, glade, and grassland habitat on public conservation areas each year. These natural communities provide key resources for native pollinators, including many declining or rare species such as the regal fritillary butterfly which is dependent on prairies. Native pollinators often benefit from habitat management activities for several years following implementation.

The Department also offers financial assistance to private landowners interested in seeding diverse, wildlife-friendly plantings. To preserve Missouri's ecological diversity, increased emphasis is placed on the use of Missouri source and origin native plant materials, particularly when being placed adjacent to native prairie or savanna habitats where soils have not been disturbed by cropping. Higher levels of financial assistance are available when Missouri source and origin native plant materials are used for plantings.

The Department works closely with the Natural Resources Conservation Service (NRCS) to provide input and recommendations in the development of high-diversity wildlife seeding mixes required in several of the United States Department of Agriculture (USDA) conservation programs. The NRCS mixes, as well as mixes recommended within the Department's financial Landowner Assistance Program, routinely include at least 3 to 5 pounds of native forbs to ensure diverse plantings suitable for pollinators and other wildlife. Additionally, in partnership with the University of Missouri Bradford Research and Extension Center, the Department is sponsoring a research project to monitor pollinator use of Missouri ecotype and non-ecotype forb plantings in the effort to identify the optimal seeding mixes for Missouri native pollinators.

A diversity of natural community management across all Department-owned lands ensures quality habitat is provided for as many species as possible, including pollinators. The Department is currently developing a software reporting system to spatially categorize acreage estimates of all natural community habitats on Department-managed conservation areas.

RESOLUTION NO. 25 – SMALL GAME MANAGEMENT

CFM encourages the Missouri Department of Conservation to increase management and allocate more resources for small game, such as squirrel, rabbit, and bull frog population improvement.

RESPONSE: The Missouri Department of Conservation is dedicated to managing and conserving all wildlife in the state, including small game. The Department realizes that small game resources are important to many Missourians, and has taken steps to ensure that small game species receive due attention.

Recently, the Department created and filled a Small Game Coordinator position that is focused on small game issues such as habitat management, hunter recruitment, and cooperation/collaboration with other groups and agencies with a stake in small game. The Department's commitment to small game is reflected in many recent activities: revision of the Bobwhite Recovery Plan, review of conservation areas with a small game management focus, conversion of row crop acres to more wildlife-friendly cover, and development of population surveys for small game on Department lands. In addition, the Department has created a Quail and Small Game Task Force whose duty is to identify, focus on, and advance small game issues.

Healthy small game populations are important to the Department's staff and the Conservation Commission. This dedication is reflected by recent changes to staff work plans, agency goals, budgetary considerations, and guidelines for managing Department-owned and operated lands.

RESOLUTION NO. 26 – POSITION STATEMENT ON LEAD (Pb) AMMUNITION AND FISHING TACKLE

CFM urges the Missouri Department of Conservation to explicitly recognize Pb has been known for centuries to be a broad-spectrum toxin to humans and wildlife, work toward a voluntary long-term reduction in the use of traditional Pb based ammunition and fishing tackle, and promote nontoxic or non-Pb alternatives, while recognizing complete replacement may not be possible. Recognize reduction of Pb for hunting, fishing, and shooting will require collaboration, cooperation, and coordination among many different stakeholders, including wildlife professionals, hunters, anglers, policymakers, ammunition and tackle manufacturers, retailers, and the general public. Advocate for communication and information strategies that build partnerships, and acknowledge the crucial role hunters and anglers play in conservation. Support coordinated communication/information efforts to promote greater public awareness and understanding of the consequences of Pb exposure to wildlife populations, and emphasize the benefits to wildlife and the environment for using nontoxic and non-Pb ammunition and tackle alternatives. CFM requests that the Missouri Department of Conservation develop and implement strategies to increase understanding and awareness regarding the consequences of Pb exposure to wildlife and emphasizing the benefits of using nontoxic-shot and non-Pb ammunition. Suggested outreach efforts include regulation brochures, conservation area signs and kiosks, hunter education materials, incentive programs to convert to non-Pb ammunition and tackle, live shooting demonstrations with nontoxic-shot and non-Pb ammunition, websites, and the *Missouri Conservationist* magazine.

RESPONSE: The Missouri Department of Conservation acknowledges the concerns brought forward in the position statement and recognizes economic and social factors solicit strong opinions regarding the use of lead for shooting sports and angling. As stated in Resolution 26, hunters and anglers have been using lead for centuries and it may take decades to change the course of the use of lead for recreational pursuits. The Department recognizes that these changes must involve all stakeholders and that it will take time to inform and build support with the wide variety of interests at local, state, national, and international levels.

Many conservation areas where waterfowl hunting occurs have had regulations in place that prohibit the use of lead shot since the early 1990's and intensively managed dove fields on certain conservation areas since 2007.

The proposal to build a coordinated, voluntary program is a reasonable approach. The Department has already taken steps toward sharing information about lead through the avenues identified in the resolution. The Effective Wingshooting workshops, offered by the Department, has instructed over 1,200 individuals in effective shooting of non-toxic shot. In recent years, the Department has included information in our hunting regulations brochures about the potential hazards of lead and the availability of non-lead alternatives. The Department has also been working with the Missouri Department of Health and Senior Services (DHSS) to communicate information about alternatives to lead sinkers in the annual fish consumption advisory, which can be found on the DHSS website. The Department will continue to consider this issue and take the methods presented in Resolution 26 under advisement.

RESOLUTION NO. 31 – CAPTIVE WILDLIFE INSPECTION PROGRAM RESOLUTION

CFM requests the Missouri Department of Conservation to revise and improve its process, policies, and regulations pertaining to inspection, recordkeeping, and enforcement of regulations that apply to captive cervid facilities in the following respects:

1. Increase the frequency of inspection on captive cervid facilities to at least one mandatory inspection per year; and

2. MDC should consistently issue citations for documented violations; and
3. MDC should develop standard reporting forms to be used by Missouri's captive cervid industry; and
4. MDC should electronically store and maintain captive wildlife inspection records at a central location for a minimum of fifteen years; and
5. MDC should implement a program to train MDC personnel to thoroughly and uniformly inspect deer facilities; and
6. The MDC Protection Division should publish an annual report of captive wildlife program including number of inspections, escapes, mortalities, citations issued, and fines assessed.

RESPONSE: The Missouri Department of Conservation supports several of the recommendations to improve the policies regarding captive cervid facilities in Missouri. Proposed regulation changes considered during the April 28, 2014, meeting of the Regulations Committee included mandatory annual inspections of all facilities and a 15-year record retention requirement by captive cervid producers. The Department also agrees that uniform inspections are needed. Staff from Protection and Resource Science divisions have developed standardized reporting forms to thoroughly document fencing information, animal movement, herd inventory, and disease testing requirements. All inspection records are now routinely uploaded to the Protection Division's internal website.

The Department recognizes that not all violations by captive cervid producers will result in a citation. Citations are issued at the discretion of the conservation agent for all violations of the *Wildlife Code of Missouri* due to the uniqueness of each situation encountered. The removal of officer discretion in law enforcement situations has proven to be less effective at ensuring compliance. All arrests resulting in a conviction are maintained in perpetuity in the Department of Conservation's Arrest Record Database.

Protection Division currently provides a summary of major program efforts as part of the Department's annual report. Protection Division will consider adding a category summarizing captive wildlife enforcement efforts in future annual reports.

RESOLUTION NO. 32 – CWD

CFM finds the Missouri Department of Conservation's system for permitting deer facilities requires strengthening in many respects. CFM suggests that the Missouri Department of Conservation and the Missouri Conservation Commission conduct a thorough review of its deer facility permitting program with input from the public and make the following procedural changes and regulatory modifications:

1. Permits must have all landowners sign application and be included as permittees, not just operator if different from landowner(s); and
2. If the operator is not the landowner, the operator must also sign the application and be a co-permittee with the landowner; and
3. Ask permit applicant to confirm whether the permittee is a sole proprietor, partnership, or corporation. If a partnership, require all partners to sign application. If a corporation, confirm that the corporation is in good standing with Secretary of State's office; and
4. Application must require submission of property deed for verification of all owners; and

5. A legal description and map of pen area should be required to be on application and permit; and
6. Permits, including permit renewals, must go on public notice for 30 days. The draft permit shall include the names of all owners and operators and the physical location of the facility. The public notice for permit renewals shall also summarize the status of the facility's compliance with its permit during the last permit cycle and the Missouri Wildlife Code; and
7. Changes to fence boundaries or other structures, beyond routine maintenance and repair, must be approved as an amendment to the existing permit and inspected/approved prior to use; and
8. All herd plans shall go on public notice for 30 days and be posted on MDC's web page; and
9. All permittees shall be enrolled in CWD program (on movement of ALL cervids). No more "voluntary" program; and
10. MDC should develop a points system for revoking or suspending permits. The points system should undergo public notice for comment and to make sure cervid industry is aware of point system; and
11. Permit language should make reference to points system and potential for suspension or revocation of permit; and
12. Regulation and permit should require monthly submission of a report on all changes in deer numbers (e.g. imports, deer that died, shot, missing, escaped, transported out); and
13. Permit application and monthly reports must include a signatory's certification statement (allows prosecution for perjury); and
14. Application and permit should include language in which they acknowledge their permit could be suspended or revoked and they could be required to depopulate; and
15. Regulation and permits should allow MDC to quarantine contaminated areas on property from which deer must be excluded; which may require continuation of deer proof fence after depopulation to prevent deer access to contaminated areas; and
16. Permit fees should be adjusted if necessary to help cover MDC expenses associated with administering the program; and
17. Sale of the \$10 "Hunting preserve hunting permit" required for those hunting on permitted game preserves should be moved from the current on-site, paper-based system to the main MDC permit system, to be acquired from vendors or on-line. Currently permits are not on the public record nor maintained anywhere other than on-site. These permits should be part of the public record subject to the Missouri Sunshine Law; and
18. Hunter education requirements for game preserve permit holders are not adequately screened. There should be a system to ensure these shooters are certified.

RESPONSE: The Missouri Department of Conservation acknowledges that the processes for issuing permits to hold deer in captivity and for issuing permits to shooters on big game hunting preserves are primary focus

areas for the management of the chronic wasting disease (CWD) threat in Missouri and for the facilitation of safe hunting practices on big game hunting preserves.

Current regulations and procedures already address many of the concerns posed in this resolution. Some of these procedures and regulations include: requirements for the on-site inspection of a facility by a conservation agent prior to the issuance of a permit, requirements for the permit applicant to provide proof that animals will be secured from a legal source prior to the issuance of a permit, record keeping and mandatory escaped animal reporting requirements, regulations providing notice to all permit holders that the commission may suspend, revoke, or deny their permit for cause, a point system is used to identify serious and repeat *Wildlife Code* offenders for permit revocation by the commission, and regulations requiring the verification of hunter education certification prior to the issuance of any firearms hunting permit. However, regulatory and procedural changes that will allow the Department to more effectively manage the CWD threat and provide additional screening for shooters on big game hunting preserves are currently being vetted in the Department's regulation-making process. These potential changes include adjustments to the permitting process for facilities and shooters, inventory and record keeping requirements, the inter- and intra-state movement of cervids, fencing requirements, and improved testing requirements.

The Department is deeply concerned about the implications of the proliferation of CWD and will continue to do everything within its authority to implement procedures and regulations to minimize, contain, and eliminate the threat caused by CWD to all deer in Missouri.

RESOLUTION NO. 33 – BEAR SCARE IN MISSOURI

CFM encourages the Missouri Department of Conservation to emphasize appreciation of black bears in Missouri while educating the public regarding the minimal threat they pose to human safety.

RESPONSE: The Missouri Department of Conservation places a high priority on public outreach and education regarding black bears in Missouri. The presence of black bears in Missouri is a tremendous testimony to the habitat conservation and wildlife management heritage of our state. The Department wants all Missourians to understand and appreciate that conservation legacy and recognize that black bears do not pose a threat to human safety when they are respected as wildlife. The Department, in cooperation with the Missouri Department of Natural Resources and the newly formed Missouri Black Bear Foundation, is working to create and distribute "bear aware" educational materials. In addition, the Department has an internet web page dedicated to Missouri's black bear research project that includes information about the black bear's natural history, habitat use, and movements. This web page provides a unique opportunity for citizens to "follow" the movements of the research project's radio marked bears. All of these efforts will help citizens understand bear behavior and how to avoid practices that could encourage human/bear conflicts.

RESOLUTION NO. 34 – RETAINING THE RIGHT TO HARVEST DEER BY CENTER-FIRE RIFLE


CFM encourages state legislators and the Missouri Department of Conservation to protect the hunting heritage of Missourians by retaining their right to pursue deer with center-fire rifles.

RESPONSE: The Missouri Constitution gives the Conservation Commission authority over the management and control of all game and wildlife resources of the state, including seasons, methods, and limits. The Missouri Department of Conservation agrees that maintaining the ability of hunters to use center-fire rifles to harvest deer is important to the state's hunting heritage and influences our ability to manage deer populations. During the 2014-15 deer season, the firearms portions that allow center-fire rifles composed 74% of Missouri's deer harvest; therefore, center-fire rifles not only influence deer harvest, but also the number of

Mr. Brandon Butler
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hunters who choose to hunt deer. Since the first modern day firearm season in 1944, Missouri has developed a long tradition of hunting deer with firearms, including center-fire rifles. However, it is also important to recognize that the ability to alter methods legal during various portions of the deer seasons is one of the tools the Department uses to manage hunting pressure and regulate harvest. The Department understands the importance of preserving center-fire rifles as a method to pursue deer, therefore, will offer opportunities that promote Missouri's hunting heritage, while maintaining biologically and socially balanced deer populations.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Ziehmer", enclosed within a large, hand-drawn oval.

ROBERT L. ZIEHMER
DIRECTOR

c: Conservation Commission
Deputy Director Draper
Deputy Director Ripperger
Commission Secretary

Brandon,

Attached please find a letter of support for the CFM Resolution regarding Conservation Education and the use of Projects WET, WILD and Learning Tree, Flying WILD and Discover Nature Schools.

I did have a question though that wasn't completely clear in the resolution and one that will be unclear for the Missouri Department of Elementary and Secondary Education as well. Was the recommendation for DESE to add this component to all ELEMENTARY teachers teaching certificates? All middle and high school SCIENCE teachers teaching certificates? I'm assuming it won't be recommended for middle or high school English teachers teaching certificates or other subjects?

If I need to make a change on this at some point, please let me know. Also, I will be back in my office late next week and the first week in June and could send a copy with an original signature at that point too, if you need it.

One last thing--we are currently in the process of moving Project Learning Tree to MSU, as MDC will no longer be able to focus on the program. I will be the new state coordinator of PLT, but I'm not sure I can put that on the letter until I know the contracts are signed and accepted. We currently have no state sponsor or state coordinator for WILD, but I know enough about the program that I felt I could include it in the letter. I hope that is acceptable as well.

Thanks!

Erica Cox
State Coordinator, Missouri Project WET
Aquatic Education Specialist--MSU
417-836-4337

May 21, 2014

To whom it may concern:

I support the efforts of the Conservation Federation of Missouri to recommend that the Missouri Department of Elementary and Secondary Education consider adding a conservation education component to teaching certificates in the state of Missouri.

Programs such as Project WET (Water Education for Teachers), Project Learning Tree and Project WILD all focus on providing opportunities for students to learn "how to think, but not what to think" and are promoted as nonbiased environmental education programs, as well as supporting the idea of conservation or wise use of resources. All three Projects have been around for many years now and have all been field-tested in both classroom settings, as well as other non-formal education settings. Many classroom teachers in Missouri already do use the Projects as a regular part of their classroom curricula.

Perhaps one of the greatest strengths of these programs for teachers is that the activities in the Project WET, WILD and Learning Tree guides simply enhance their existing curricula and can easily fit into already planned units and lessons. Teachers and schools can use these activities to support what they already need to do.

Project WET activities are aligned with the current Missouri Grade Level Expectations and Course Level Expectations for science. As education moves towards national standards such as the Common Core State Standards (Missouri Learning Standards) and discusses the possibility of using some form of the Next Generation Science Standards, the Projects are a part of that process. Project WET activities are already aligned with the Common Core Standards and also the Next Generation Science Standards. Project Learning Tree and Project WILD are working towards that goal too. Classroom teachers and curriculum specialists are doing the work of aligning Projects activities to national standards.

Adding Projects WET, WILD and Learning Tree to an undergraduate's program before receiving a teaching certificate would certainly add to their knowledge base and give new teachers a research-based, tried and true set of activities to use in their classrooms. When K-12 students are engaged in their learning, we also know that they are more successful in the classroom. And, the bottom line is that we want our Missouri students to learn, be successful and have a good conservation background in order to be well-rounded and informed citizens.

Sincerely,

Erica Cox

Erica Cox
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