

10658 Winterhawk
Boise, Idaho 83709
November 30, 1981

Paul M. Howard
Deputy Chief for Technology Development and Application
Soil Conservation Service
U.S. Department of Agriculture
P.O. Box 2890
Washington, D.C. 20013

Dear Mr. Howard:

Our Chapter representative has reviewed your proposed rule 7CFR part 650 published in FR 46:206 pp 52119-21. We believe the proposed rule is too general, evasive and would allow any landowner or SCS technician to use such rules to gain Government assistance to drain valuable wetlands. We do not believe this is keeping with the spirit of E.O. 11990. Part 650.26 (c) 2(i) B (2) (page 52120) is such a loop hole that landowners could apply for SCS technical assistance (and receive it) at the drop of a hat. On the surface, it appears that the "margin of flexibility" you seek in establishing these relaxed proposed regulations is a means to circumvent the spirit of E.O. 11990.

On behalf of the members of the Idaho Chapter, I urge that SCS not adopt this proposed regulation and that you maintain operations based upon your existing regulation.

Sincerely yours,

James F. Gore, President

cc: Senators Symms & McClure
Congressmen Craig and Hansen