



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

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SARA PARKER PAULEY, Director

April 27, 2020

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

Dear Mr. Schwartze:

The resolutions that pertain to the Missouri Department of Conservation (Department), adopted at the 2020 annual meeting of the Conservation Federation of Missouri (CFM), have been considered by staff. In response, we submit the following comments:

RESOLUTION #2020-1: Remove Antler Point Restrictions for Youth Archery Permittees. To afford youth archery permittees the same opportunity for success that is provided for Missouri's youth firearms season hunters, CFM supports no longer making the "4 Point Buck" regulation applicable for youth archery hunters.

RESPONSE: The antler-point restriction (APR) is a popular hunting regulation in Missouri which receives a high degree of support from deer hunters in the counties in which it is implemented. Implementation of this regulation by the Department in select counties was motivated by hunter desires to increase the age-structure of the buck segment of the population, thereby offering a greater chance of harvesting an older buck.

Although the APR is a popular regulation in the counties where it is implemented, the Department has exempted youth hunters (ages 6-15) from having to abide by the APR during the early and late youth portions of firearms deer season. During the remainder of the firearms deer season, youth hunters must abide by the APR in the counties where the regulation is instated. Although the structure of the firearms deer season offers the opportunity to establish separate season portions exclusively for youth hunters, timing and structure of the archery season does not offer such an opportunity. As such, both youth and adult hunters are required to abide by the APR during the archery season.

Whenever the Department provides a regulatory exemption for a segment of hunters (e.g., youth hunters during youth portions of firearms deer season) or considers implementing an exemption, we attempt to balance the potential benefits of the

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exemption with the associated regulatory complexity that is introduced. With respect to exempting youth hunters from the APR during the archery season, we are concerned about the additional regulatory complexity that would result from this change. In addition to the distinction between whether youth hunters must abide by the APR during the various portions of the firearms deer season, the regulation change associated with the resolution would require another distinction be made between the archery and firearms seasons.

In addition to increasing regulatory complexity, the latest information obtained from the Department's Deer Hunter Opinion Survey suggests that most hunters (including youths) would not be likely to support youths being exempt from the APR. Specifically, the latest survey results indicate that most adult and youth hunters support the APR where it is instated. Because of this, removing the requirement for youths to abide by the APR does not seem justified at this time.

RESOLUTION #2020-4: Use of Precision Agriculture on Missouri Department of Conservation Land. CFM encourages the Missouri Department of Conservation to expand the use of precision agriculture to improve the conservation of public lands.

RESPONSE: The Department is committed to being good stewards of public resources including fields where crops are grown. The opportunity to farm on conservation areas is advertised and bid locally and the Department leases approximately 61,000 acres of open land to just over 300 permittee farmers for agriculture. The size of the conservation area, the size and number of fields, the county average yield of the soil, and the capability of the farmer and their equipment are all factors that affect how crops are grown on Department areas. Each conservation area where crops are grown and the permittee participates in a USDA program has a soil conservation plan in place from the Natural Resources Conservation Service (NRCS).

Some permittee farmers on Department lands have upgraded their equipment and are practicing Precision Agriculture while others do not possess the available technology or have not taken advantage of contractors to implement it. At this time, there are relatively few restrictions placed on farmers growing crops on conservation areas and the decisions on how to farm are made by the farmer. Crops planted by Department staff are rarely harvested and are left in the field for wildlife.

The Department appreciates the comments regarding expanding Precision Agriculture use on conservation areas. We will ask staff to investigate ways to incorporate a weighting system for evaluating bids to favor conservation farming practices that are good soil health practices including Precision Agriculture, use of untreated seed, use of cover crops, use of strip cropping, no-till farming, and other methods.

RESOLUTION #2020-5: Halt the Planting of Non-Native Invasive Species on State-Owned Property. CFM recommends that all state agencies, including the Department, halt the planting of non-native invasive species on property they own throughout the state, including office locations. Furthermore, planted species on state properties should be required to consist of native species or non-native plants proven to be not invasive. Additionally, existing known non-native invasive species on state properties should be replaced with species native to Missouri or non-native plants proven to be not invasive.

RESPONSE: The Department agrees with and supports the CFM resolution to halt the planting of non-native invasive species, the planting of native or not invasive species, and the replacement of existing known non-native invasive species with native or not invasive species on state-owned property. Non-native invasive species are a serious threat to Missouri's native species and natural communities, as well as agriculture, utilities, recreation, aesthetics, and many other facets of life. Additionally, the cost of combatting invasive species, especially once established within the state, is significant.

Proactively leading the focus against invasive species and the value of native species, in 2015, the Department formed the internal, interdisciplinary Invasive Species Coordination Team (InSCT) to focus strategically on invasive species operations. This team developed a prioritization structure for invasive species focus, including a tiered approach outlining which types of species take priority over others and which areas of the state to focus effort. The InSCT also developed a new outreach and education campaign to encourage citizen and partner engagement in combatting invasive species and promoting native species in places they care about – *Stop the Invasion. Join the Fight.*

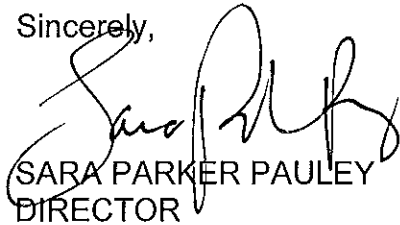
In addition to internal focus, members of the Department's InSCT are active and serve in leadership capacities within various invasive species partnerships in Missouri. This includes being a founding member and leader within the Missouri Invasive Plant Task Force (MoIP), the Missouri Invasive Forest Pest Council (MIFPC), the Scenic Rivers Invasive Species Partnership (SRISP), and the Missouri Feral Hog Elimination Partnership. The Department is also engaged in other important invasive species initiatives, such as the 100th Meridian, which focuses on aquatic nuisance species, and Slow the Spread, centered around gypsy moth. In addition, the Department supports many universities, non-governmental organizations (NGOs), and volunteer efforts in their missions to promote native species and limit the impact of invasive species. Combined actions resulting from these various partnerships and organizations has led to increased awareness and outstanding success in the struggle against invasive species and the investment in keeping native species on the landscape.

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Finally, the Department applauds CFM in emphasizing Missouri's native species within this resolution. Often overshadowed in the quest to limit the impact of invasive species, the conservation of native species is critical, as they provide unparalleled ecological services to the citizens of Missouri, including pollination, food, soil health, water and air quality, aesthetics, recreation opportunities, mental health, and so much more!

Thank you for taking initiative to reduce the impact of invasive species and to promote Missouri's native species! The Department will not plant, or promote the planting of known non-native invasive species, will remove any existing planted non-native invasive species (if any) and replace them with native species in accordance with our strategic approach and as budget and time allow. The Department will continue to lead, engage, and partner in invasive species prevention, control, and management actions and promote the ongoing conservation of Missouri's native species and natural communities to federal, state, and local government entities, private businesses, private landowners, and all other citizens.

Sincerely,



SARA PARKER PAULEY
DIRECTOR

c: Conservation Commission
Deputy Director Hubbard
Deputy Director Battson Warren
Deputy Director Jeffries
Commission Secretary