



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Mike Kehoe
Governor

Jake Buxton
Director

MEMORANDUM
2027-005

DATE: September 23, 2026

TO: All Soil and Water Conservation Districts

FROM: Jim Plassmeyer, Director *JP*
Soil and Water Conservation Program

SUBJECT: State Cost-Share Practices Cultural Resource Review Changes

During the August 19, 2026 Soil and Water Districts Commission meeting, Program Staff presented to the Commission an evaluation that was conducted on the state cost-share program by the Department of Natural Resources leadership. The primary focus of the evaluation was to determine if the state cost-share program is a federal undertaking and subject to Section 106 of the National Historic Preservation Act.

The Commission approved a motion acknowledging that the state cost-share program is not a federal undertaking and practices are not subject to Section 106 reviews. During the evaluation process, it was determined the Natural Resource Conservation Service (NRCS) Environmental Evaluation Worksheet Form CPA-52 must be completed for state projects to identify them as a non-federal undertaking and to document discussions with the landowner of known artifacts on the property. Furthermore, the motion addressed the state cost-share practices currently submitted for a cultural resource evaluation. Those practices will need the CPA-52 updated to indicate they are not a federal undertaking. Once the CPA-52 is updated, the district can continue with the planning and implementation process of the practices that were previously submitted for a cultural resource review. NRCS will provide an updated CPA-52 form with changes to address the state cost-share practices.

The Commission's motion also addressed providing a cultural resource recognition statement to the landowners. A statement was added to the state cost-share contract item number 8. The addition states: "The area where the practice is being implemented has not been reviewed for any impacts the practice may have on cultural resources. Additional information is available upon request if the landowner wishes to have a cultural resources evaluation completed." The additional information mentioned in the above statement is the contact information for an archeologist. The district can provide contact information for one of the partnership's archeologists to do the evaluation if they are available. Or the district can provide the contact



information to the State Historic Preservation Office (SHPO). SHPO will not do the site evaluation, but they maintain a list of private archeologists that can do the work. The landowner will be responsible for the cost of the private archeologist since the Section 106 review is not a requirement of the state cost-share program.

Throughout the evaluation process the awareness and importance of cultural resources was discussed. Cultural resource training will continue to be a part of the conservation planner training.

The action taken by the commission only addresses that the state cost-share program is not a federal undertaking and not subject to the Section 106 reviews. This action of the commission does not affect any other part of the conservation planning process.

If you have further questions, please contact your district coordinator. Thank you.