

508

As of: April
24, 2009
Received:
March 17,
2009
Status:
Pending_Post
Tracking
No.
80918435
Comments
Due: March
17, 2009
Submission
Type: Web

PUBLIC SUBMISSION

Docket: NRCS-2009-0007
Technical Service Provider Assistance

Comment On: NRCS-2009-0007-0001
Technical Service Provider Assistance

Document: NRCS-2009-0007-DRAFT-0009
Comment on FR Doc # E9-00828

Submitter Information

Name: Leslie Allen Everett
Address:

173 McNeal Hall
1985 Buford Ave.
St. Paul, MN, 55108

Email: evere003@umn.edu

Phone: 612-625-6751

Submitter's Representative: Leslie Everett

Organization: University of Minnesota Water Resources Center

General Comment

1. The FOOD, CONSERVATION, AND ENERGY ACT OF 2008, Title II Conservation Subtitle H—Funding and Administration of Conservation Programs, SEC. 1242. DELIVERY OF TECHNICAL ASSISTANCE, (f) ADMINISTRATION, (4) ELIGIBLE ACTIVITIES, (A) INCLUSION OF ACTIVITIES, states: "The Secretary may include as activities eligible for payments to a third party provider, (i) technical services provided directly to eligible participants, such as conservation planning, education and outreach, and assistance with design and implementation of conservation practices; and (ii) related technical assistance services that accelerate conservation program delivery." It appears that education and

outreach are authorized in the law but not implemented in the rule. Education and outreach are an indispensable part of implementation and maintenance of conservation practices and should be explicitly provided for in the rule as intended by Congress.

2. We welcome the recognition that some aspects of training Technical Service Providers require the participation of NRCS personnel. Adequate knowledge for training in Department regulations, policies, procedures, and processes cannot be adequately maintained by those outside the Department.

3. Technical training of TSPs in subject matters with very limited audiences cannot be supported by participant course fees. Course development and delivery takes too much personnel time to be paid for by courses that are delivered once per year to a small audience. In Minnesota for two years we have supported these trainings on limited-time state clean water grant funds. This is coming to an end. If NRCS wishes to have trained TSPs, they need to put some funds into it. There is sufficient flexibility in the law to accomplish this, and the Cooperative Extension Services are willing partners if there is a contribution from NRCS to offset some of the costs.

