

MISSOURI DEPARTMENT OF CONSERVATION
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MAR 17 2009

Fax

To: Technical Service Program Team	Date: March 16, 2009
USDA	
Fax:	From: Missouri Dept of Conservation
Re: Technical Service Provider (TSP) Comments	Total pages including cover: 3

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MISSOURI DEPARTMENT OF CONSERVATION

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JOHN D. HOSKINS, Director

March 13, 2009

Technical Service Provider Team
 U.S. Department of Agriculture
 Natural Resources Conservation Service
 Technical Service Provider Assistance Comments
 P.O. Box 2890, Room 5234-S
 Washington, DC 20013

Dear Team Leader:

The Missouri Department of Conservation (Department) is a state agency responsible for the management of fish, forest and wildlife resources in the state of Missouri. The Department has a long standing partnership with USDA-NRCS in Missouri and provides technical assistance for the implementation of Farm Bill conservation programs. We offer the following comments for the Technical Service Provider Assistance Rule, Docket Number NRCS – IFR- 08011, posted in the Federal Register:

652.1 Applicability:

(b) Please clarify why "installation" is included in the list and how a TSP could qualify.

Insert and expand the list of activities, as per statute, to "accelerate the delivery of conservation programs"- the statute states: "technical services provided directly to eligible participants, such as conservation planning, education and outreach, and assistance with design and implementation of conservation practices; and related technical assistance services that accelerate conservation program delivery."

Recommendation:

New wording for (b): Technical service providers may provide technical services to eligible participants in conservation and forestry planning, education, outreach, participant training, and assistance with the planning, design, installation, implementation, and check-out of conservation practices applied on private land, Indian land, or where allowed by conservation program rules on public land where there is a direct private land benefit.

652.2 Definitions:

Lacks definition of related technical services; law includes it, but rule leaves out outreach and education; recommend including these in the rule.

Recommendations:

Definition of technical service means the assistance provided by technical service providers, including conservation and forestry planning, landowner and participant education, outreach, and training; conservation practice assistance, design, layout, implementation and installation; and certification that the conservation practice meets NRCS standards and specifications

COMMISSION

DON R. JOHNSON
 Festus

CHIP MCGEEHAN
 Marshfield

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BECKY L. PLATTNER
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Definition of related technical assistance services means all other forms of assistance to NRCS and landowners that accelerates the delivery of technical assistance and may include landowner or participant contacts and relations; site visits; assistance with practice coordination and the implementation of plans; NRCS staff and landowner/participant training on initiatives or practices; as well as activities or services that facilitate the development, processing, or implementation of a program contract, including recording conservation planning decisions and specifications.

652.5 Eligible participant acquisition of technical services:

Recommendations:

(e) We applaud inclusion of the term "activity plans suitable for subsequent incorporation into a program contract";

(iii) We encourage USDA to include a statement about "state payment rates may vary" and the need to meet local market conditions;

(iv) An annual review should allow for adjustments to help meet local market rates/conditions;

(v) We commend NRCS for the forethought to include this provision in the rule because of the flexibility it allows.

Section 652.6 Department delivery of technical services

Recommendations:

(a) Expand the list of related technical assistance services to be consistent with statute:

Related technical assistance services may include all other forms of assistance to NRCS and the landowner or participant that accelerates the delivery of technical assistance such as landowner contacts and relations; site visits; assistance with practice coordination and the implementation of plans; NRCS staff and landowner training on initiatives or practices; as well as activities or services that facilitate the development, processing, or implementation of a program contract, including recording conservation planning decisions and specifications.

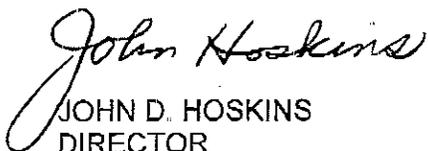
(b) We request that NRCS expand list of related technical assistance services in same paragraph to be consistent with the statute.

(c) We commend you for specifying state fish and wildlife agencies -- for realizing the value that states bring to the table with respect to expertise on fish and wildlife issues. We also commend NRCS for use of the term "agreements" which allows more state-by-state flexibility. This is critical to the success of technical assistance delivery.

(e) We encourage NRCS to use 3-year umbrella agreements, when appropriate, that can be amended annually to address fluctuations in annual appropriations, workload, staff capacity and natural resource concerns. This provides for consistency and stability over time for NRCS staff, landowners and participants as well as technical service providers.

The Missouri Department of Conservation appreciates the opportunity for comment. If you require additional information, please contact Private Land Programs Supervisor, Bill White at 573-522-4115, Ext. 3512.

Sincerely,


JOHN D. HOSKINS
DIRECTOR

c: Mr. Bill White