



TENNESSEE WILDLIFE RESOURCES AGENCY

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TSP

March 16, 2009

Technical Services Provider Team
Natural Resources Conservation Service
Technical Services Provider Assistance Comments
P.O. Box 2890, Room 5234-S
Washington, D.C. 20013

**RE: Federal Register Docket Number NRCS-IFR-08011, Technical Services
Provider Assistance Interim Rule**

Dear Sir or Madam:

The Tennessee Wildlife Resources Agency appreciates the opportunity to comment on the proposed rule affecting Technical Service Provider Assistance (TSPA) as provided by the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill).

TWRA fully supports the specific recommendations offered by the Association of Fish and Wildlife Agencies (AFWA) on the behalf of the entire group of state fish and wildlife agencies.

TWRA is committed to assisting NRCS to accelerate the delivery of conservation programs and resulting wildlife benefits. As such, TWRA has a current agreement with NRCS for four cooperative biologists (TWRA biologists that work out of NRCS offices to deliver wildlife aspects of USDA conservation programs and TWRA landowner programs) that began in June 2007. In the relatively short time these biologists have been in place, we are realizing more participation in WHIP and other wildlife-related aspects of USDA conservation programs than ever before, and believe our state NRCS would agree that these cooperative positions are an effective means to realize the full benefits of the program without an increase in NRCS staff.

We urge NRCS to continue to look for ways to improve the opportunities for these agreements, one of which would be by providing 3-year agreements whenever possible and appropriate. It would greatly assist state agencies to be able to attract and retain high quality individuals for these positions when they know funding is secure. Requiring less than a 50% match would also greatly assist many state wildlife agencies facing significant budget shortfalls.

The State of Tennessee

AN EQUAL OPPORTUNITY EQUAL ACCESS AFFIRMATIVE ACTION EMPLOYER

TWRA comments on ISP Rule

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Thank you for your consideration of our Agency's comments. Please feel free to contact me or TWRA Private Lands Liaison Mark Gudlin (Mark.Gudlin@state.tn.us , 615-781-6614) with any questions about our comments, or if we can further assist with this provision.

Sincerely,



Ed Carter
Executive Director

Cc: Mr. Kevin Brown, NRCS State Conservationist for Tennessee