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April 30, 2003

Melissa Hammond  
Technical Service Provider Coordinator  
Natural Resources Conservation Service  
U.S. Department of Agriculture  
P.O. Box 2890  
Washington, D.C. 20013

**RE:** Additional comments on interim rule for Technical Service Provider Assistance (7 CFR Part 652),

Dear Melissa:

I am writing to add some comments to my letters of February 17 and April 11 about the TSP interim rule. These comments expand on the comments I made about "Different Roles for Different Types of TSPs" in Attachment 3 of my April 11 letter.

Over the past two months, I've had the opportunity to travel to several states and to talk to local producers, local soil and water conservation districts and resource conservation districts, NRCS staff at the state and local levels, and retired NRCS staff.

I've been struck by the amount of fear, uncertainty and outright hostility I've encountered about the TSP program.

Change never comes easily or without objections. The TSP program certainly represents a major change. And you have been blessed with being the person who has the opportunity to cobble this program together, but also is the target for everyone's concerns.

I've said in my earlier letters that I believe the TSP program has the capacity and potential to do great good, by expanding on the opportunities for conservation delivery throughout the U.S.

But it also has the capacity and potential to do great harm. And it's these concerns that I've heard voiced time and time again that I would like to address here.

The major concerns I've heard about the TSP program are:

1. It will take NRCS people out of the field, where they have spent their careers doing hands-on conservation and developing relationships with producers;
2. It will turn NRCS people into paper-pushers and managers who will not do the work themselves, but oversee other people who will do the work (and who will have the fun of working directly with producers)

3. It will undermine quality control and accountability (apparently some people who already have been through the certification process were fired from NRCS for not doing their jobs properly, which undermines people's confidence in just how good the certification process is going to be);
4. It will undermine morale at NRCS (most people at the agency are very dedicated to their jobs and joined the agency because it is not regulatory, and it gives them the opportunity to do real work in the field where results are tangible, measurable and concrete); these are not people who want to see their roles changed;
5. NRCS is unique as an agency, promoting voluntary conservation on the nation's private lands, acting as a partner and facilitator, not as a regulator;
6. The TSP program could undermine NRCS's valuable role as a hands-on conservation agency that has intimate knowledge of local conditions and local producers and has gained credibility with producers (at least in the areas of the country where it has had good managers and good people ... as you well know, that is not the case everywhere).
7. The TSP program is a "Trojan Horse" designed by people in Congress who are "out to get" NRCS and who want to see agency merged into FSA. One of the concerns here is that this could allow the U.S. Environmental Protection Agency to step in as THE "natural resource agency" for agriculture, with its paperwork intensive, regulatory approach, which is not only the exact opposite of the NRCS approach, but one that could have very negative, costly impacts on producers and the agricultural industry.

Even after hearing these concerns, I remain a strong supporter of the TSP program, and stand by all the comments I've made previously. In fact, I feel that the comments I've already made would help address and overcome most of these concerns – except #7, which you can interpret in any way you wish.

But I do want to clarify one point about the roles of various agencies, partners and TSPs as described in Attachment 3 to my April 11, 2003 letter and as depicted in the "Flow Chart" that was a part of that attachment, as well as part of my February 17 letter.

I feel very strongly that NRCS should maintain its current role as a direct provider of technical services to producers. There is no agency that is better at this. This is NRCS's greatest strength – its hands-on contact with producers and knowledge of local conditions and needs. The TSP program should be designed to build on this strength, and every precaution should be taken to ensure that the way the TSP program is implemented does not undermine or replace NRCS or substitute other approaches for what NRCS already does well. NRCS needs help in being able to deliver conservation to more producers in a more effective, more timely and more efficient way. The TSP program has the potential to EXPAND on and EXTEND NRCS's current capabilities, and every effort should be taken to ensure it does this, without detracting from any of NRCS's strengths.

Without hands-on experience and direct contact with producers, NRCS will not have its sense of place, and be attuned to the nuances of the communities it is trying to serve, and therefore, will not be able to properly oversee and manage other groups that are trying to serve producers. This is critical: NRCS must maintain its current role, and the TSP should help NRCS build on and extend this role.

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So how do take care of all the management, oversight, training, certification, supervision, monitoring, etc. that will be required by the TSP program? That, I believe, is the perfect role for Soil and Water Conservation Districts and Resource Conservation Districts, the traditional conservation “partners” of NRCS.

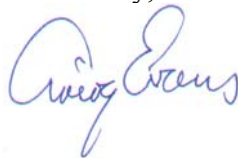
NRCS should have oversight, should ensure quality control and accountability, and should provide certification. But the administrative details could be given to SWCDs and RCDs.

Many SWCDs and RCDs are currently underutilized and have the opportunity (and desire) to expand their capabilities. Many are currently scrambling for ways to raise funds (even competing, as I mentioned in Attachment 3 to my April 11 letter, with private companies). But if SWCDs and RCDs become THE managers of the TSP program for NRCS, and are adequately funded to provide this administrative support, then NRCS will be able to continue to perform its current role, and the SWCDs and RCDs would provide the perfect complement as NRCS’s leading partners in carrying out the administration of the TSP program.

The “Flow Chart” and the comments relating to that chart from my February 17 and April 11 letters remain essentially the same – except that I’ve added arrows moving back and forth between NRCS, producers and TSP providers for “input and feedback” to more accurately reflect the essential role NRCS provides in maintaining direct contact with producers – and the direct role it will play with TSP providers (hopefully, as I’ve suggested, through MOUs and specific Scopes of Services).

I hope you will find these comments useful.

Sincerely,



Craig Evans  
President