



TENNESSEE FARM BUREAU FEDERATION

September 3, 2024

United States Fish and Wildlife Service
Public Comments Processing
5275 Leesburg Pike
Falls Church, VA 22041-3803

**Re: Docket No. FWS-R4-ES-2023-0224; Endangered and Threatened Species:
Designation of Critical Habitat for Barrens Topminnow**

To Whom it May Concern:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to submit comments for the proposed rule titled *Endangered and Threatened Species: Designation of Critical Habitat for Barrens Topminnow*. With over 695,000 members, TFBF is the largest general farm organization in Tennessee, representing the varied commodity producers across the state. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues related to agriculture and rural living. On behalf of our member producers, we welcome the opportunity to provide an agricultural perspective to the information requested by the U.S. Fish and Wildlife Service (FWS).

The Barrens topminnow (*Fundulus julisia*) is a small fish endemic to streams found on the Barrens plateau in middle Tennessee, specifically Cannon, Coffee, Dekalb, Franklin, Grundy, and Warren counties. This portion of middle Tennessee is a thriving production agriculture region of the state. According to the U.S. Census of Agriculture, agriculture brought in a combined \$498.9 million total market value of ag products sold in 2022 in the six counties identified for critical habitat for the Barrens topminnow¹. The varied commodities produced here include but are not limited to row crops, livestock, fruits and vegetables, nursery crops, and hay.

Farmers in Tennessee have a deep and abiding interest in protection of the environment and the species which inhabit it based upon philosophical beliefs and practical self-interest. TFBF supports efforts to protect habitat for listed species so long as they simultaneously support production agriculture. The agricultural sector has taken extensive

¹ "2022 Census of Agriculture State and County Profiles – Tennessee." USDA National Agricultural Statistics Service; [Census of Agriculture - 2022 Census Publications - State and County Profiles - Tennessee \(usda.gov\)](https://www.nass.usda.gov/publications/census_of_agriculture/2022/census_publications/state_and_county_profiles/tennessee/)

strides throughout history to reduce its environmental impact, and we firmly believe production agriculture and species protection can coexist.

When considering areas to identify as critical habitat for the Barrens topminnow, we encourage FWS to select specific areas best suited for the species rather than the designation of an entire county or multi-county area. This approach will support the species in the most effective way and allow for production agriculture to continue.

In question 6 of the proposed rule document, FWS asks what specific areas should be considered for exclusion under section 4(b)(2) of the Act. TFBF believes agricultural and cultivated lands should be considered for exclusion. The continuation of production agriculture and producing the world's food, fiber, and fuel should qualify as reasonable benefits for being excluded from critical habitat designation.

Farmers take pride in being the stewards of the land bestowed upon them to produce the world's food, fiber, and fuel. Part of this responsibility is actively working to protect our natural resources and species under threat. We urge FWS to consider impacts on farmers, their farms, and the overall agricultural industry when making decisions for critical habitat designations.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation