



TENNESSEE FARM BUREAU FEDERATION

February 10, 2025

Public Comments Processing
Attn: FWS-R3-ES-2024-0152
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

**Re: Docket No. FWS-R3-ES-2024-0152; Endangered and Threatened Species:
Status for Eastern Hellbender**

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: Status for Eastern Hellbender* (Proposed Rule). 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 Eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*) is a large aquatic salamander found in perennial streams across 15 states, including Tennessee. Its ideal habitat includes fast-flowing, cool, and highly oxygenated streams. Based on these characteristics, FWS has identified four adaptive capacity units to evaluate past, current, and future representation of the species. Two of them include the Ohio River-Susquehanna River and Tennessee River drainage. According to Figure 1 of the Proposed Rule¹, these two units constitute over two-thirds of the area of the entire state of Tennessee.

Agriculture is a key contributor to Tennessee's economy, ranking as the number one industry in the state. According to the U.S. Census of Agriculture, agriculture accounted for \$5.2 billion in market value of agricultural products sold in the state of Tennessee in

¹ "Endangered and Threatened Species: Status for Eastern Hellbender"; U.S. Fish and Wildlife Service; <https://www.regulations.gov/document/FWS-R3-ES-2024-0152-0001>; February 3, 2025

2022². The varied commodities produced in Tennessee include but are not limited to row crops, livestock, fruits and vegetables, nursery crops, hay, and tobacco.

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 species so long as they simultaneously support production agriculture. The agricultural sector has taken extensive strides throughout history to reduce its environmental impact, and we firmly believe production agriculture and species protection can coexist.

When outlining the perceived threats to the Eastern hellbender, FWS identifies sedimentation and water quality degradation as two of the largest threat to the viability of the species. In both cases, agricultural practices are potential causes of these threats. However, farmers across Tennessee are heavy adopters of conservation practices to reduce sedimentation and nutrient runoff into water sources. According to the University of Tennessee Institute of Agriculture's 2024 Tennessee Nutrient Management Report, 87% of farmers utilize no-till and 53% use cover crops. In fact, Tennessee was the state with the highest percentage of adoption of no-tillage and conservation tillage practices in 2022. When making a listing decision for the Eastern hellbender, TFBF urges FWS to acknowledge existing conservation practices in Tennessee which already help protect the state's water sources.

Farmers take pride in being 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, the products they're growing, and the overall agricultural industry when making listing decisions.

Thank you for your consideration.

Sincerely,



Eric Mayberry
President
Tennessee Farm Bureau Federation

² "Ranking of Market Value of Ag Products Sold"; 2022 U.S. Census of Agriculture – U.S. National Agriculture Statistics Service;
https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/Rankings_of_Market_Value/market_value_47.pdf; February 3, 2025