



## TENNESSEE FARM BUREAU FEDERATION

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September 2, 2025

Public Comments Processing  
Attn: FWS-R4-ES-2025-0033  
U.S. Fish and Wildlife Service  
MS: PRB/3W  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

**Re: Docket No. FWS-R4-ES-2025-0033; *Endangered and Threatened Wildlife and Plants: Endangered Species Status for Barrens Darter***

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to submit comments for the proposed rule titled *Endangered and Threatened Wildlife and Plants: Endangered Species Status for Barrens Darter* (Proposed Rule). With over 690,000 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 darter (*Etheostoma forbesi*) is a small fish endemic to streams in the Barrens Plateau region of middle Tennessee, including Cannon, Coffee, Grundy, and Warren counties. It is found in the Collins River watershed, a tributary to the Caney Fork of the Cumberland River. Its ideal habitat includes small headwater streams with slab rock substrates and strong groundwater influence. These counties in middle Tennessee are part of thriving production agriculture region of the state, producing varied commodities including but not limited to row crops, livestock, fruits and vegetables, nursery crops, and hay. According to the U.S. Census of Agriculture, agriculture accounted for over \$335.5 million in total market value of agricultural products sold in 2022 in the four counties where the Barrens darter is found<sup>1</sup>.

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.

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<sup>1</sup> "2022 Census of Agriculture State and County Profiles – Tennessee." USDA National Agriculture Statistics Service; [Census of Agriculture - 2022 Census Publications - State and County Profiles - Tennessee](#)

When outlining the perceived threats to the Barrens darter, FWS identifies water quality and quantity as having a significant impact on the viability of the species. Production agriculture practices such as livestock grazing and water withdrawals for row crops and nursery operations are mentioned as major contributors to water quality and quantity issues. FWS puts major emphasis on livestock grazing and uninhibited access to water sources, citing stream bank erosion, sedimentation, and excess animal waste as having direct impacts on Barrens darter populations.

However, farmers across Tennessee are heavy adopters of conservation practices to reduce water quality impacts, such as stream bank stabilization, riparian buffers, and streambank fencing to keep livestock out of water sources. In fact, many farmers across the state partner with the U.S. government to achieve their conservation goals. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) provides numerous programs to achieve increased adoption of conservation practices on working agricultural lands. One example of this is through the Environmental Quality Incentives Program (EQIP), which offers technical and financial assistance to farmers to help maintain or improve production while conserving natural resources on working landscapes. Farmers work directly with NRCS to develop farm-specific conservation plans to implement practices which improve water and air quality, conserve ground and surface water, increase soil health and reduce soil erosion and sedimentation, improve or create wildlife habitat, and mitigate against drought and other weather extremes. In 2024, NRCS obligated \$94.2 million across over 258,000 acres in Tennessee. When making a listing decision and evaluating mitigation response for the Barrens darter, 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,

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

Eric Mayberry  
President  
Tennessee Farm Bureau Federation