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# TENNESSEE WILDLIFE RESOURCES AGENCY



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March 1, 2004

Conservation Security Program Comments  
ATTN: David McKay  
Conservation Operations Division, NRCS  
P.O. Box 2890  
Washington, D.C. 20013

Dear Mr. McKay:

Thank you for the opportunity to comment on the Proposed Rule for the Conservation Security Program. Following are the comments we would like to submit from the Tennessee Wildlife Resources Agency, beginning with some general program comments, and followed by specific remarks in response to topic categories provided to us by NRCS on the enclosed comment sheets.

Overall, there seems to be some major incongruity of the Proposed Rule with the Joint Explanatory Statement of the Committee of Conference of the 2002 Farm Bill ("the Statement"). The Statement makes reference that the CSP will be "open to all producers for maintaining or adopting practices on private agricultural land...", and will "...allow all agricultural producers...to participate equitably in the program." However, the Proposed Rule language limits eligible producers to those in "targeted watersheds" across the country. We are greatly concerned that a limited number of watersheds can be objectively chosen when having to consider the various resource concerns, and the potential for politics to play a big role in choosing which watersheds are selected. Negative public reaction to restricting funding to a relatively few number of watersheds could severely impact the public reaction to the program, regardless of benefits realized. An example of this is EQIP, which when initially implemented, targeted watersheds got the lion's share of the program funding, even though landusers in other watersheds still had a chance (although more limited) of getting their offers funded. It did not take long for outcry to change the approach in EQIP away from targeted watersheds. According to the CSP Proposed Rule, a majority of landusers will (at least initially) not even have access to the program.

The emphasis for choosing the targeted watersheds in the Proposed Rule seems quite nebulous, and limited to being ranked on soil and water criteria, although the program is supposed to be addressing other significant resource concerns, including wildlife. The Statement makes it quite clear in several instances that wildlife should be a resource concern, and even includes the "Managers Intent" language in Section (7) *Conforming Amendments* encouraging the Secretary to use the Farm Bill programs to help restore habitat for the species. In general, there seems to be a very weak emphasis on fish and wildlife resources in the Proposed Rule language. If

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implemented, the CSP has great potential to restore habitat for many critical and at-risk species. At-risk species should also be included as a nationally significant resource concern. Water quantity should also be included as a nationally significant resource. If participants implement water use reduction strategies and techniques (i.e. drip irrigation, techniques to reduce evaporation, techniques to hold soil moisture, etc.), the water that is unused will be available for other uses such as: irrigation for other farmers, drinking water supplies, industrial uses, and for fish (i.e. salmon, etc.). This would be a valuable tool to help conserve this valuable resource for the benefit of farmers, fish and wildlife, and society in general.

We strongly suggest that certain minimum levels of wildlife habitat criteria and management be built into the qualifications for each Tier of the CSP. For example, to be eligible for Tier I, a participant should exclude livestock from woodlots and streams, using rotational grazing, etc.; Tier II incorporates native grass buffers along streams, ponds and lakes, a minimum percentage of open land in a short-term "flex fallow" option or native vegetation field borders and corners or native grass hay, a management plan in place for associated woodlands, etc.; and Tier III incorporating more active management to benefit wildlife. It should be required for each state's State Technical Committee to obtain concurrence with the USFWS and respective state wildlife agency for determination of tier standards for wildlife habitat. Otherwise, the State Technical Committee is not bound to consider or utilize the wildlife determinations of these agencies.

If NRCS still decides to use the targeted watershed approach, when considering changing priority watersheds between signups, we suggest it should be required for NRCS to demonstrate that significant progress was made towards improving the resource condition(s) on which the watershed was chosen in the first place. Also, will there be a minimum CSP allotment for any one individual state? Otherwise, depending on what watershed ranking criteria are used, some states conceivably might not get any funding.

What is the general strategy in prioritizing watersheds? As the Proposed Rule reads, it appears to be targeting the best producers in the worst watersheds. The proposed language indicates that the program will target the greatest resource needs, but will reward the farmers doing the best conservation. Are these two things, at least to some extent, somewhat contradictory? If you have a watershed where most farmers have incorporated good conservation practices, it seems like it would be less likely that the resource needs would be largely met. Is the concept to seek the worst watersheds and reward a small number of better farmers, and try to drag the rest along, or seek the best watersheds and provide money to good farmers, but be much less likely to be making resource improvements because most of them are already incorporating good practices?

It appears that the development of the Proposed Rule was heavily influenced by the current Congressional budgetary restraints, and was not designed with maximum effectiveness as a program. Recognizing that the budgetary constraints are a stark reality, consideration might be given to implementing CSP more as a pilot program, and limit the program to a few states on that basis, and open up the program to all landusers in that state. That is the way the program was envisioned by Congress, and the way it needs to work in order to be effective as an "integrator of conservation programs". CSP will never reach this status unless funding is increased to the point that the program is actually available to all farmers, not just farmers in targeted watersheds. Unless the CSP is structured so it serves as a gateway for more likely

acceptance (or any acceptance) into the other programs and better integrate the technical and financial assistance now offered under the other programs, it will probably still be more financially beneficial to the farmer to get as much land accepted into CRP, GRP, etc., and then come to NRCS to address everything else under CSP.

## **Conservation Security Program Comment Sheet**

Publication of the proposed rule for the Conservation Security Program (CSP) on January 2, 2004, marks the start of the 60-day public comment period. Public comment will be an important part of creating the Conservation Security Program. You may access it via the Internet through the NRCS home page at <http://www.nrcs.usda.gov>. Select "Farm Bill." People can submit comments to [david.mckay@usda.gov](mailto:david.mckay@usda.gov) or mail their comments to Conservation Security Program Comments, ATTN: David McKay, Conservation Operations Division, NRCS, P.O. Box 2890, Washington, D.C. 20013.

Comments are sought on all facets of the program. The intent of this document is to summarize those areas. You are encouraged to refer to the proposed rule publication for detailed information.

1. **Preferred Approach (page 197):** Under the constraints of a capped entitlement, the Secretary has proposed ways to still deliver an effective CSP program. NRCS is proposing an approach based on five elements. Comments are requested on this overall approach:

- **Limit sign-ups:** Conduct periodic CSP sign-ups
- **Eligibility:** Criteria should be sufficiently rigorous to insure that participants are committed to conservation stewardship. Additionally, eligibility criteria should ensure that the most pressing resource concerns are addressed.
- **Contracts:** Requirements should be sufficiently rigorous to ensure that participants undertake and maintain high levels of stewardship.
- **Enrollment categories:** Prioritize funding to insure that those producers with the highest commitment to conservation are funded first.
- **Payments:** Structure payments to ensure that environmental benefits will be achieved.

(A more detailed description of this approach can be found on page 197 under the heading *NRCS Preferred Approach*.)

Comments: Proposed Rule, p. 31, regarding CSP in relation to other NRCS programs, states, "...CSP is viewed as the potential integrator of all conservation programs within the Department." Can CSP be structured where, instead of coming up with yet another separate USDA program with separate rules and cost share rates, that CSP serves as a gateway for the participant to enroll qualifying practices under other applicable programs such as EQIP and CRP (or at least under the same regulations and payment rates), and bypass the normal entry system into those programs? Having participated in two scoping sessions prior to the 2002 Farm Bill, the one issue that USDA personnel, other agency personnel, producers, private conservationists,

etc. could all agree on is that they favored fewer USDA programs and less confusion. We ended up with more. If CSP is to be the potential integrator, it needs to serve more as an umbrella instead of yet another stand-alone conservation program.

**2. Funding Enrollment Categories (page 198, 3<sup>rd</sup> column).** Under “4. Prioritize Funding To Ensure That Those Producers With the Highest Commitment to Conservation Are Funded First,” NRCS is inviting comment on how to handle situations where there may be insufficient funds for all enrollment categories.

Comments:

**3. Enhancement Activities (page 199, column 1 and 2).** The Statute offers five types of enhancement activities and NRCS is seeking comments on the following concepts:

- The improvement of a significant resource concern to a condition that exceeds the requirements for the participant’s tier of participation and contract requirements.
- An improvement in a priority local resource condition.
- Participation in an on-farm conservation research, demonstration or pilot project.
- Cooperation with other producers to implement watershed or regional resource conservation plans that involve at least 75% of the producers in the targeted area.
- Implementation of assessment and evaluation activities relating to practices included in the CSP.

Comments: p. 43-44, 48 Enhancement practices and payments. This issue will have to be addressed carefully, as there could be quite a bit of overlap or various perspectives on many practices as to what constitutes the difference between the implementation of a practice as it applies to the tier levels, what would be expected management practices, and what would be enhancement activities that would entitle the participant to addition or higher payments. E.g. native grass practices – would there be more intensive periodic management (strip disking, strip herbiciding) required at the different tier levels for the same practice? Would prescribed burning of the grasses be considered an enhancement, as many landowners are reluctant to burn, but yet this is the most effective management practice? Do enhancements just confuse the issue, and would it be better to just reward those performing activities that “exceed the NRCS minimum level of treatment” to be in a higher tier? An excellent example of the necessity for solid criteria to decide on what is or is not an enhancement practice, is the first example of an enhancement given in the PowerPoint slideshow that was used by NRCS at our State Technical Committee meeting (also included on p. 77 of the Proposed Rule). The example of an enhancement was simply installing a riparian forest buffer. This is clearly not an enhancement, but a conservation practice, which by its use or lack thereof would determine whether a participant is addressing resource concerns, and belongs in one tier or the next. An enhancement regarding this practice would likely be whether or not it included the optional Zone 3 native grass strip, or whether there was other specific management of the riparian buffer that would enhance it’s effectiveness in filtering sediments, providing shade to the stream, or maximizing wildlife benefits.

Does the landowner actually have to perform the enhancement practice (e.g. will they get the enhancement payment if another group, such as an NGO or local university, is actually performing the enhancement activity)?

4. **Alternative Approaches** (page 199 and 200). In addition to the preferred approach, NRCS considered several alternatives. NRCS is seeking comments on the proposed approach and these alternatives.

- Use enrollment categories to prioritize CSP resources in high priority watersheds identified by NRCS administrative regions.
- Apportion the limited budget according to a formula of some kind, for example by discounting each participant's contract payment equally.
- Close sign-up once available funds are exhausted.
- Limit the number of tiers of participation offered.
- Only allow historic stewards to participate – only those who have already completed the highest conservation achievement would be funded.

Comments: We favor limiting the number of tiers of participation offered.

5. **Limited Resource Producers** (page 201, column 3). NRCS welcomes examples and suggestions for identifying conservation opportunities related to limited resource operations. Comments regarding how other programs could best help limited resource and other less capitalized producers to become eligible for CSP, given the stewardship standards to participate, are also welcome.

Comments:

6. **Leveraging CSP** (page 201, column 3). NRCS is seeking comment on the opportunity to use CSP in a collaborative mode with other programs to effectively leverage the Federal contribution to resource improvement and enhancement.

Comments:

7. **Leveraging CSP** (page 202, column 1). NRCS is seeking comment on how to implement a program that uses collaboration and leveraging of funds to achieve resource improvements on working agricultural lands through intensive management activities and innovative technologies.

Comments:

8. **Environmental Performance, Evaluation and Accountability** (page 202, column 3). NRCS welcomes comments and suggestions for designing and implementing evaluation approaches, and suggestions as to what data and information would be most useful to ensure a high level of accountability for CSP.

Comments: In the Proposed Rule, the statement is made that, "NRCS intends to make the CSP the most accountable conservation program it has ever implemented."

NRCS in many cases may not be currently conducting adequate compliance inspections on some of their other programs (WHIP, WRP). It is highly unlikely that, without additional staff, that NRCS can add the increased burden on their employees of yet another program to implement, let alone conduct the adequate post-contract attention that would be needed to back up that claim.

We have doubts that landuser self-certification is sufficient for documenting that practices were done thoroughly and are being maintained properly. We strongly agree that USDA should monitor contract compliance. Compliance is one area that might be pursued in TSP agreements with other appropriate agencies or organizations if manpower constraints are a concern.

**9. Significant Resource Concerns (page 203).** NRCS is proposing to designate water quality and soil quality as nationally significant resource concerns. NRCS requests additional public comment on the use of nationally significant resource concerns.

Comments: See comments made in introductory section of the letter.

**10. Definition of Agricultural Operation (page 205, column 2).** The Act refers to "agricultural operation" without defining the term. NRCS has evaluated various definition alternatives and is seeking comment on their chosen proposed definition found on page 205, column 2. This definition is the same as used in the Great Plains Conservation Program (GPCP).

Comments: TWRA agrees with the proposed definition of. Many farmers have several tracts with different farm numbers that essentially are being managed as one operation. Using farm numbers as the defining criteria would complicate the issue. However, there should be one consistent definition of "agricultural operation" within USDA to avoid confusion or inequities.

**11. Incidental Forest Land (page 206, column 1).** Forestland offered for inclusion in a CSP contract as an incidental part of the agricultural operation must meet the guidelines listed on page 206, column 1. NRCS is seeking comments on the usefulness of these guidelines for managing questions relative to the inclusion of incidental forested lands in CSP contracts.

Comments:

**12. Incidental Forest Land Treatment (page 206, column 1).** Another issue that NRCS seeks guidance on is the question of what level of treatment should be required for the forestland that is included in the CSP contract as land incidental to the agricultural operation?

Comments:

**13. Enhancement Payments (page 206, column 3).** NRCS seeks additional comments on the construction and calculation of enhancement payments.

Comments:

**14. Contract Limits (page 206, column 3).** NRCS seeking additional comments on the idea of a one-producer, one-contract approach brought up by the respondents to the Advanced Notice of Proposed Rule.

Comments: We strongly agree with letting landowners and operators negotiating the CSP payment split. That is a fight NRCS needs to stay out of in any program! If the landowner and

operator have agreed on the split, a CSP agreement should be able to be pursued without either of those parties contesting it. If no written agreement between the two parties, no CSP contract.

**15. Administration (page 208, column 2).** One important aspect of CSP administration is the procedures NRCS will follow if NRCS receives more eligible applications than it can fund. NRCS is specifically seeking comment on how to select the contracts of the pool of eligible producers to best serve the purpose of the program.

Comments:

**16. Changes in Landuse (page 209, column 3).** In some instances a management decision may be made that causes a major shift in land use, such as changes from a less intensive use or from a more intensive landuse. This change in land use may change the base payment eligibility. NRCS is asking comment on how this situation can be addressed in the rule.

Comments:

**17. Eligibility Requirements (page 210, column 1).** Concerns were expressed through the Advanced Notice of Proposed Rule process that producers not accept stewardship payments while at the same time operating land outside the CSP contract at a less-than-acceptable level of treatment. NRCS is seeking comments on this provision.

Comments:

**18. Eligibility Requirements (page 210, column 2).** Producers who have historically met or exceeded the requirements, in some cases, may have endured a flood, fire, or other event that has either destroyed or damaged practices that would have made them eligible for CSP. NRCS is seeking comment on whether there should be any special dispensation or consideration given for this situation.

Comments: As with other USDA programs, allowances should be made to the producer when a natural disaster or event destroys or damages the practices.

**19. Eligibility Requirements (page 210, column 3).** As a contract requirement, the participant will be required to do additional conservation practices, measures, or enhancements as outlined in this section and in the sign-up announcement. NRCS is seeking comment on these minimum eligibility and contract requirements.

Comments:

**20. Eligibility Requirements (page 210, column 3).** NRCS is also seeking comments on the utility of a self-screening tool (both Web-based and hardcopy) to assist producers in determining if they should consider application to CSP. Should this self-screening tool be a regulatory requirement as described in the proposed rule?

Comments: Proposed Rule, p. 63. We strongly agree that the participants need to certify that they have control of the land for the contract period and will provide appropriate evidence. Also agree to special dispensation or consideration should a natural disaster or other event affect the conservation treatments.

**21. Enrollment Categories (page 211, column 1).** NRCS proposing to fund as many subcategories within the last category to be funded as possible. Additionally, NRCS is seeking comments on whether the remaining subcategories should be offered pro-rated payments, or not funded at all.

Comments: In order to avoid confusion, it would seem best to not fund categories instead of developing pro-rated payment systems.

**22. Enrollment Categories (page 211, column 1).** NRCS is seeking comments on whether it should partially fund applications, or whether only those categories and subcategories that could be fully funded would be offered a CSP contract.

Comments: It would seem that in order for the program to work effectively, applications will need to be fully funded. The public and program participants (or potential participants) get frustrated when programs cannot be delivered as advertised, negatively affecting their perceptions of all other USDA programs.

**23. Conservation Practices (page 211, column 3).** NRCS is proposing to utilize the new practice component of CSP to provide cost-share when practices are needed, although at a lower cost share than other USDA programs, to minimize redundancy between CSP and other existing USDA conservation programs. NRCS seeks comment on whether this approach will encourage participants to install practices through other programs in order to become eligible for CSP.

Comments:

**24. Technical Assistance (page 211 and 212).** CSP technical assistance tasks identified include: 1) Conduct the sign-up and application process; 2) Conduct conservation planning; conservation practice survey, layout, design, installation, and certification; 3) Training, certification, and quality assurance of professional conservationists; and 4) Evaluation and assessment of the producer's operation and maintenance needs. NRCS is seeking comments on which tasks would be appropriate for approved or certified Technical Service Providers.

Comments:

**25. Additional Requirements for Tier I and Tier II (page 212, column 2).** NRCS is proposing that CSP participants must address the following by the end of their contract:

- Tier I contracts must address the national significant resource concerns and any additional requirements as required in the enrollment category or sign-up announcement; and
- Tier II would require a significant resource concern, other than the national significant resource concerns, to be selected by the applicant over the entire agricultural operation.

NRCS is seeking comment on the value of these additional requirements for Tier I and II contracts in order to maximize the environmental performance of the CSP program.

Comments: See previous comments about needed clarity between Tier performances and enhancement payments.

**26. Tier Transition (page 212, column 2).** NRCS is proposing a mechanism for a participant to transition to a higher tier of participation and is seeking comment on this proposal (see page 212).

Comments:

**27. Contract Noncompliance (page 212, column 3).** If the participant cannot fulfill his CSP contract commitment, the contract calls for the participant to refund any CSP payments received with interest, and forfeit any future payments under CSP. NRCS is interested in comments on this and other concerns that the public might have on noncompliance with the CSP contract requirements.

Comments: While retaining flexibility for contract modifications and other changes, there still needs to be significant disincentives for participants to not back out of contracts or significantly reducing the landuser commitment to the contract requirements. There will be a significant NRCS input in executing a CSP contract. One program we've experienced with the WHIP program is that people can back out without penalty, which in essence "steals" money and opportunities from other landusers who would be willing to carry out their WHIP contract.

Proposed Rule, p. 74, last paragraph, 2<sup>nd</sup> sentence. Strongly agree. If the participant cannot fulfill his CSP contract commitment payments received with interest should be refunded to the program, otherwise the participant will be paid for resource benefits that will be lost.

Proposed Rule, p.55 Quality assurance. We strongly agree that USDA should monitor contract compliance. Compliance is one area that might be pursued in TSP agreements with other appropriate agencies or organizations if manpower constraints are a concern. (This comment also applies to paragraph 1 on page 70).

p. 33, 3<sup>rd</sup> paragraph. The statement is made that, "NRCS intends to make the CSP the most accountable conservation program it has ever implemented."

NRCS in many cases may not be currently conducting adequate compliance inspections on some of their other programs (WHIP, WRP, as I understand). It is highly unlikely that, without additional staff, that NRCS can add the increased burden on their employees of yet another program to implement, let alone conduct the adequate post-contract attention that would be needed to back up that claim. It would be sorely questionable to rely on landuser self-certification for documenting that practices were done thoroughly and are being maintained properly.

**28. Rental Payment Reduction Factor (page 213, column 1).** NRCS is seeking comment on whether the reduction factor should be fixed or variable over the life of the program, with the 0.1 factor being the upper limit.

Comments:

**29. Assessment and Evaluation (page 214, column 1).** NRCS is seeking comments on which assessment and evaluation projects would most benefit from the involvement of CSP participants and would be most useful for program evaluation.

Comments:

**30. Enhancement Activity Payments (page 214, column 1).** NRCS is seeking comments on how to determine the appropriate payment rates for those types of enhancement activities where the payment is intended to encourage producers to change their mode of operation, but not necessarily to offset additional or more expensive activities.

Comments:

Additional comments and suggested wording changes in the Proposed Rule include:

p. 15, 4<sup>th</sup> paragraph: change to read, "To ensure that CSP participants have a demonstrated commitment to conservation, NRCS is proposing to require CSP applicants to address specified resource concerns, soil quality, water quality, *and wildlife habitat quality* for tier I and tier II levels...."

p. 16, insert after the 1st paragraph: "Wildlife Habitat Quality for the purposes of CSP means that vegetative cover types and management thereof provides minimum levels of wildlife benefits (as addressed under \_\_\_\_\_ of NRCS technical guides)."

p.16, current 2<sup>nd</sup> paragraph, 7<sup>th</sup> sentence, change to read: "...control, *native vegetation* buffers and field borders, and... Likewise, in the 9<sup>th</sup> sentence, change it to read: "...residue management, fertilization, weed control, insect control, *native vegetation* buffers and field borders, and ..."

p. 16, current 2<sup>nd</sup> paragraph, 11<sup>th</sup> sentence, change to read: "...systems might include: pasture and hayland planting, *conversion of exotic pasture grasses to native warm season grasses*, grazing management, haying, ..."

p. 17, current 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence, change to read: "NRCS proposes to identify watersheds (using eight-digit hydrologic unit codes developed by the U. S. Geological Survey) around the nation based on objective information from natural resource (especially at-risk species information), environmental quality and agricultural activity data."

p. 19, Item 4., current 1<sup>st</sup> paragraph, 5<sup>th</sup> or last sentence, change to read: "NRCS will develop criteria for construction of enrollment categories such as the soil conditioning index, soil and

water conservation practices and systems, fish and wildlife benefits (especially for at-risk species), and grazing land condition.”

p. 20, 2<sup>nd</sup> bullet, 2<sup>nd</sup> sentence, change to read: “For example, addressing water quality and fish and wildlife concerns by the installation of riparian forest buffers to provide shade and cool surface water temperatures to restore critical habitat for salmon;”

p. 31, *CSP in relation to other NRCS programs*. “...CSP is viewed as the potential integrator of all conservation programs within the Department.”

CSP will never reach this status unless funding is increased to the point that the program is actually available to all farmers, not just farmers in targeted watersheds. Unless the CSP is structured so it serves as a gateway for more likely acceptance (or any acceptance) into the other programs and better integrate the technical and financial assistance now offered under the other programs, it will probably still be more financially beneficial to the farmer to get as much land accepted into CRP, GRP, etc., and then come to NRCS to address everything else under CSP.

In fact, if minimum levels of wildlife benefits were adequately incorporated into all NRCS practice standards (and were enforced), and were incorporated as suggested in the various levels of CSP and the other programs (I’m not holding my breath...), USDA could probably do away with WHIP!!

p. 32, 1<sup>st</sup> paragraph, 5<sup>th</sup> sentence, change to read: “Improvements to the landscape – including *native* grasslands, flood plains, and riparian zones...”

p. 34, 3<sup>rd</sup> paragraph. “NRCS welcomes comments and suggestions for designing and implementing monitoring approaches, and suggestions as to what data and information would be most useful to ensure a high level of accountability for CSP”.

Surely NRCS will not be able to monitor but a small portion of watersheds where CSP is implemented. NRCS already has a wealth of good information on the effectiveness of many practices. What are the most pressing unanswered questions within each resource group – soil, water, air, plants, wildlife? In the wildlife resource, there are certainly many unanswered questions to the response of species to various levels of conservation implementation. E.g. If we can implement 7-10% of the open landscape in good quality native grass/natural vegetation buffers, what response do quail and other declining grass and shrubland birds exhibit? Where to do what research and monitoring will be a difficult question to answer until we see what level of specific conservation practices are being implemented in various watersheds.

p. 50-51 Fair treatment of tenants. We strongly agree with letting landowners and operators negotiating the CSP payment split. That is a fight NRCS needs to stay out of in any program! If the landowner and operator have agreed on the split, a CSP agreement should be able to be pursued without either of those parties contesting it. If no written agreement between the two parties, no CSP contract.

p. 77-78. We reiterate our previous point that it will be difficult to be consistent between program implementation in various watersheds across the country, and clear criteria be identified

as to whether a conservation treatment is an enhancement activity, or brings a participant from one tier level to the next higher one.

p. 89 Definition of pastureland – change to read: “Pastureland means a land cover/use of land managed primarily for the production of introduced *and/or native* forage plants for grazing animals. Management usually consists of cultural treatments: fertilization, weed control, reseeding or renovation, control of grazing, or *prescribed burning (native warm season grasses)*).

Thank you for consider of these comments submitted on behalf of the Tennessee Wildlife Resources Agency. We look forward in our continued role in assisting USDA where we can to bring meaningful conservation programs to the landusers of Tennessee.

Sincerely,



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