

**Statement of the Tennessee Farm Bureau Federation Regarding the Proposed General
Aquatic Resource Alteration Permit for Bank Stabilization**

July 2, 2015

The Tennessee Farm Bureau appreciates the opportunity to comment regarding the proposed General Aquatic Resource Alteration Permit for Bank Stabilization. Many farmers involved in soil conservation efforts across the state have concerns with the proposal. We understand the Department has been working to find a solution to some of these concerns and we hope this dialogue will continue with stakeholders.

This general permit has historically served an important role for landowners in their attempt to stop soil loss into streams and conserve property along streambanks. In the sphere of soil conservation nationwide, landowners work to eliminate sedimentation in streams and rivers whether it be from erosion across fields or along banks. This is not a new concept. Soil loss is a natural process landowners will always struggle with, especially with land use changes that accompany inevitable development throughout a watershed. The Department has made this general permit available to assist landowners in these efforts, however we want to ensure going forward this permit continues to strike a balance between protecting resources in the stream and correcting natural process of soil erosion that also harms resources in the stream.

Landowners depend on expertise of USDA Natural Resources Conservation Service (NRCS) for technical advice and cost share funding to complete bank stabilization projects. Much of this work is carried out through the local Soil Conservation Districts in each county. We have heard from numerous county Soil Conservation Districts across the state with concerns over this proposal. They believe the conditions of the permit will cause unnecessary design standards and put at risk the success of projects to properly function under these conditions. We believe NRCS has developed sound bioengineering techniques recognized nationally to preserve instream resources while accomplishing the goal of reducing soil loss.

We give deference to the concerns of NRCS and the county Soil Conservation Districts. Farmers and landowners who have completed these bioengineered projects in the past have documented the success of these projects to stop soil loss and be reclaimed with vegetation. We understand the concept of using hard armoring techniques within a bioengineered project is an issue. However, these techniques have been frequently used in the past and to our knowledge the Department has not identified these techniques collectively as a source of impairment across the state.

We ask the Department to consider the comments of NRCS. Farm Bureau policy strongly supports their efforts to reduce accelerated soil erosion and stream sedimentation. Our organization also recognizes streams and rivers are clogged by fallen trees, debris, sandbars, and sedimentation caused by unstabilized banks and that regulatory hurdles should not impose obstacles for landowners trying to correct problems. NRCS has laid out a very comprehensive answer to each concern raised by our members regarding this permit proposal. We hope these

concerns can be addressed and we are available to assist in any way. For further information, please contact Stefan Maupin in our Public Policy Division at 931-388-7872.