



October 1, 2026

Mr. J'Que C. Jones
USDA, NRCS, National Agricultural Engineer
Conservation Engineering Division
1400 Independence Ave., South Building, Room 4949
Washington, DC 20250

Re: **Docket No. NRCS-2026-0100**

Submitted electronically via <http://www.regulations.gov>

Dear Mr. Jones,

The Wildlife Society (TWS) appreciates the opportunity to provide comments on the revisions to the National Handbook of Conservation Practices, as requested. As the international society of qualified wildlife professionals, TWS seeks to advance conservation through science, community, and professional excellence. We work to provide information and recommendations that protect fish and wildlife resources to local, state, and federal agencies that make decisions, deliver programmatic financial assistance and technical guidance, or make rules for practice implementation that may affect those resources. Our comments in response to these proposed revisions were developed in coordination with our Private Lands Working Group, whose members offer professional expertise on the the conservation and management of wildlife on private lands. NRCS conservation practices have the potential to benefit both production agriculture and wildlife habitat, provided that CPS set appropriate minimum requirements. These standards must avoid limiting opportunities to enhance wildlife habitat or favoring practices that could degrade it.

Regarding the current proposed revisions to the National Handbook of Conservation Practices, TWS recommends that NRCS:

- **Clearly identify wildlife habitat as a resource concern in the *Definition* and *Purpose* sections of CPS notices.** This practice would reinforce the legitimacy of wildlife habitat as a conservation priority for NRCS programs. Standardized language should be used across all practices that meaningfully establish, restore, improve, or manage natural resources in a way that benefit wildlife.
- **Consult with state fish and wildlife agencies.** These are the appropriate authorities for determining whether CPS outcomes are beneficial to wildlife habitat.
- **Prioritize the use of native, site-appropriate plant materials.** The use of non-native species has contributed to the decline of native plant communities and the wildlife species that rely on them. CPS language should prioritize, and where feasible, require the use of native, site-appropriate plant materials across all



practices involving non-crop plantings and their management to fulfill the purposes of the practice. TWS encourages NRCS to rely on Ecological Site Description models to prioritize the selection of appropriate native plant species and varieties, and to incorporate this approach consistently into practice standards and through program implementation at the federal, state, and local levels.

NRCS Technical Assistance and Financial Assistance programs are important tools for the conservation of air, soil, water, and wildlife habitat. National Conservation Practice Standards (CPS) are put forth as notices in the National Handbook of Conservation Practices (NHCP) and distributed to agencies, planning staff, states, and the public through access to the Field Office Technical Guide (FOTG). The establishment of minimum practice standards guides the use of conservation practices across NRCS programs and are often referenced for many conservation delivery programs developed by other federal, state, and non-government organizations across the nation.

TWS will participate in the USDA rulemaking process, as appropriate, to advocate for outcomes that best serve the wildlife resources we are entrusted to manage. The detailed comments provided below reflect our intent to support and defend beneficial rules while offering constructive feedback to improve program effectiveness.

Brush Management (Code 314)

Brush Management is one of the most important tools for combating woody plant encroachment that is degrading wildlife habitat quality across North America as a result of introduced species, incompatible grazing management, management neglect, and the suppression of fire as a critical component of many ecosystems. The path to restoration and sustainable extensive management of these fire-dependent ecosystems will often require an intense restorative action, like Brush Management, to allow for conditions that are subsequently compatible with less intensive management practices like Managed Grazing and Prescribed Fire.

- To clarify the use of the appropriate CPS in the planning process, it may have been fitting to separate the previous CPS language related to the use of Prescribed Burning for the purpose of Brush Management. While the proposed CPS does include a Criteria statement for use of Brush Management to promote desired plant communities that reduce wildfire and facilitate future prescribed burning, the positioning of this language may de-emphasize the common use of Brush Management as an intense restorative action specifically with the function of preparing a site for continued plant community management with Prescribed Burning, as is appropriate for many ecosites across North America.
- To the proposed Purpose "Manipulate plant structure and composition to improve ecological functions or align with the desired ecological state or plant community..."



wee suggest adding “...as a stand-alone action or as part of a series of actions to facilitate continued maintenance through less intensive management (like managed grazing and prescribed burning).” It may also be appropriate to reference prescribed burning under the Additional Criteria for this Purpose.

- TWS supports changes to the Purpose of this CPS. The emphasis on alignment with the ecological state, and wildlife habitat maintenance and improvement will serve to encourage planners and participants to use NRCS programs to benefit wildlife.
- We also support changes to the CPS that provide flexibility in the planning of methods, intensity and frequency of Brush Management applications. References to using the ESD state and transition models are helpful to produce management outcomes that are compatible with native wildlife habitat.

Soil Carbon Amendment (Code 336)

- The addition of soil amendments for any purpose is not appropriate on any previously undisturbed soils or where site-appropriate native plant communities are intact. We suggest that NRCS consider modifying the Conditions Where Practice Applies statement to: *“This practice applies to all land uses where the soils and native plant communities have been previously disturbed, and where organic carbon amendment applications will improve soil conditions to meet conservation outcome goals.”*
- We support the inclusion of language prohibiting the use of soil amendments “When changes to the plant community could be undesirable or unknown (e.g., changing a native or established desired community, plant communities sensitive to disturbance).”

Critical Area Planting (Code 342)

- TWS appreciates the Proposed Species selection language that emphasizes NOT to use designated noxious or invasive species in the planned establishments. However, these criteria could provide stronger protection against degradation of native plant communities if the language **required the use of native site-appropriate plant cultivars**. It would be appropriate for NRCS Plant Materials Centers to develop locally appropriate native plant seed mix recommendations specifically for use in this practice.

Windbreak (Code 380)

- The use and incentivization of Shelterbelts as a conservation practice is important for the non-wildlife purposes as described in the draft CPS. We recommend that alternate CPS be considered if the primary purpose is establishment or management of wildlife habitat. Whenever possible, the planning of this practice should account for wildlife habitat value and avoid causing wildlife habitat resource concerns



through introduction of non-native plants, by requiring the use of site appropriate native plant materials, planting a diversity of functional species, and considering dimensions and density of the practice to provide food and shelter for wildlife. Shelterbelts not planned with these attributes should not be considered as a qualifying Wildlife 10% spending requirement practice.

- NRCS should consider adapting this practice to application for the restoration and maintenance of native plant communities by adding a purpose of “Reduce invasive plant pressure by intercepting airborne reproductive plant materials by reducing airflow.”
- TWS appreciates the inclusion of considerations that encourage the use of native plants. However, stronger emphasis should be made to prevent the use of native and non-native woody species out of their native context, that are known to encroach into adjacent plant communities. The use of some native juniper species in a native grassland ecosystem context are known to exacerbate resource concerns predicated on the encroachment of woody species into those grasslands. Many of these species are not included on invasive species or noxious weed lists.

Fence (Code 382)

- Physical fences have potential to negatively impact wildlife populations by preventing access to important habitat, altering movements, shifting natural migrations, and causing injury and mortality for individuals attempting to cross. We strongly recommend that NRCS work to mitigate these risks by including Criteria requiring physical barriers to be designed according to the best available locally appropriate standards, and to encourage modification of adjacent fences as part of a integrated conservation plan. Physical barriers not held to these standards are likely to create or exacerbate wildlife habitat resource concerns.
- Physical fences may be implicated in exacerbation of woody encroachment of grasslands through concentration of reproductive plant material deposition, primarily through avian excretion of seeds. Limitation of unnecessary structures or consideration of non-physical barriers may limit this seed source.

Riparian Forest Buffer (Code 391)

- We recommend a requirement that trees and shrubs be native species when possible to prevent invasive species related resource concerns.
- The terms “watercourse or water body” may be ambiguous due to new rule changes to the Clean Water Act. We recommend that NRCS clarify that these terms are applicable to ephemeral, intermittent, and perennial watercourses or water bodies.
- Maintaining, enhancing, and restoring wildlife corridors to improve connectivity should be included in the purpose “Improve the quantity, quality, and connectivity of



terrestrial and aquatic habitat for wildlife...". Conditions should include ephemeral streams as well as the listed permanent or intermittent streams.

- Conditions should not be dependent upon stream banks that are sufficiently stable. Establishment of riparian forest buffers are a standard practice for streambank stabilization.
- Grazing/browsing exclusions should be designed for wildlife and livestock impacts. Best management practices for protection during plant establishment and grazing management in riparian areas should be included in the CPS.
- Minimum buffer width to reduce transport of sediments and organic material, and for improvement of terrestrial and aquatic habitat are supported in literature to be 50–100 feet. This point is further supported in the Considerations section of this notice in language referring to the complement and mimicry of natural riparian forests, and again in the description of wildlife species habitat needs. Proposed draft language in the Considerations section is helpful to produce suitable outcomes, but may be more effective if required under the Criteria section.

Dam (Code 402)

- Unless the practice is used to restore natural hydrology with a beaver dam analog or similar structure, or to prevent incursion by an invasive species, it is often inappropriate to consider a dam as a beneficial practice for wildlife. Population fragmentation, interruption of natural sediment dynamics, and other disruption of instream processes are common harmful outcomes of this practice.
- Conditions for practice application should require permissions from the governing authority for water rights.
- Additional suggested criteria should require that the structure be designed to allow for the upstream and downstream passage of aquatic organisms.
- Considerations should include the impacts to fish and wildlife created by the alteration of habitat types from lotic to lentic environments, changes in water temperature, and the elimination of riffle/run/pool systems converted to pool dominated systems.
- Considerations should also include the impacts to aquatic organisms which require unimpeded upstream and downstream movement for forage, nesting, and life cycle completion.

Grassed Waterway (Code 412)

- This CPS is not a wildlife practice and should not be planned for the purpose of improving wildlife habitat. However, Considerations that recommend the use of native and site-appropriate plant materials in the margins of this structural practice are helpful when compatible with the planned Purpose.



Wildlife Habitat Planting (Code 420)

- TWS appreciates the availability of this and other CPS explicitly to address wildlife habitat resource concerns. Further, language included in these regulations based on best practices provided by wildlife conservation stakeholders legitimizes the use of NRCS programs for important wildlife habitat management.
- TWS is concerned that the proposed additional language, “The target conditions include plant species that do not require annual cultivation and annual planting.”, may create confusion concerning the ability to include appropriate native plant materials that are classified as annual plants. Optimal outcomes for this practice would be establishment of native plant communities that include perennial and annual plants that closely approximate the historic reference plant community as described in the ESD.
- The proposed Conditions language that cautions against the use of this practice to establish woody plants inappropriately into certain grassland ecosystems is important. We recommend directing planners to refer to the Ecological Site Description to assess suitability of species established.

Forest Harvest Management (Code 511)

- Addressing wildlife resource concerns is an appropriate Purpose of this CPS, if planned explicitly for this outcome. Moreover, the Additional Criteria to Improve Wildlife Habitat should be required for all instances of this practice, as planning this practice not in accordance with these criteria exacerbates wildlife habitat resource concerns directly.
- TWS supports General Criteria to “Harvest or cut forage at a frequency and height that optimizes the desired forage stand, plant community, and stand life.” We recommend that NRCS consider additional requirements to this criteria in reference to outcomes on native rangeland plant communities where consistent timing, height, and extent of cuttings exert selective pressure on the plant community potentially leading to a loss of species diversity, uniform structure, and reduced resilience to climatic extremes and invasive species encroachment; all conditions that degrade wildlife habitat suitability.
- TWS supports the mention of wildlife habitat benefits and the referral to State guidelines for harvest management and timing. A listing of specific habitat characteristics (i.e. nesting periods) that should be considered with State guidance could be included here.

Pasture and Hay Planting (Code 512)

- TWS supports the addition of language to use CPS 420 when establishing or improving wildlife habitat as a means to help to avoid inappropriate application of this CPS.



- The directions to prescribe native plant species according to a habitat evaluation are appropriate. TWS supports the suggestion to consider a more appropriate practice for wildlife habitat focused plantings, including pollinators, and recommend that this be a standard feature of CPS notices.
- TWS feels strongly that the use of native plant species when possible, needs to be better emphasized throughout the notice. Collaborative practices like Prescribed Grazing (528) should be referenced as a critical part of establishment and management of this practice. Unless justified by a qualified wildlife biologist opinion, Pasture and Hay Planting (512) should not be used if wildlife is stated resource concern for the participant and never included as a wildlife beneficial practice that counts towards mandated acre and funding allocation for wildlife habitat when non-native plant species make up the primary component of the planting.

Streambank and Shoreline Protection (Code 580)

- We commend the drafting of this notice in a manner that should minimize impacts to geomorphology, sediment transport, fish and wildlife habitat, riparian condition, and flood-plain connectivity.

Restoration of Rare or Declining Natural Communities (Code 643)

- TWS supports the additional Purpose language that serves to better clarify the use of this CPS.
- The additional language “This practice does not substitute or replace: ...when restoration requires engineered structures to move water, hold water, or mitigate erosion.”, may require additional clarification on which CPS to use when planning low-tech erosion control structures like One Rock Dams, Log Step Falls, Media Luna, Rock Rundowns, Zuni Bowls, or Log Mats, which are common non-engineered applications of 643. For clarity it may be appropriate to create a new CPS for these applications.
- If the intent is to use 643 for low-tech erosion control structures, the Criteria that requires “a state approved risk assessment to identify constraints related to infrastructure and property in the zone of influence, including potential downstream impacts.”, may limit the use of the CPS.
- If the intent is to use 643 for low-tech erosion control structures, it would be appropriate to discuss the expected performance and lifespan of the structures. These structures prevent and reverse erosion activity by slowing water flows and collecting sediment, therefore a successful structure may be covered quickly with sediment, making subsequent planned structures appropriate in brief succession.

Early Successional Habitat Development (Code 647)



- TWS supports the proposed changes to the CPS, and feels they serve to clarify the appropriate use of the practice and distinguish it from other CPS.

Structures for Wildlife (Code 649)

- The proposed addition of language "... modification of an existing structure that is detrimental to wildlife.", is helpful and should result in more use of the practice for important applications like wildlife-friendly fence modifications.
- While brush piles and hinge cutting can produce limited temporary beneficial habitat in some circumstances, they are more often problematic by creating predator refugia, and mitigated benefit of a more complete application of practices like Brush Management. The specific identification of brush piles may result in the inappropriate and ineffective addition of this practice to most applications of brush management, resulting in degraded wildlife populations, less effective habitat management outcomes, and inefficient allocation of financial incentive funding with limited benefit.

Wetland Enhancement (Code 659)

- The proposed changes to the CPS serve to clarify the appropriate use of the practice and distinguish it from other CPS. The language added to clarify the appropriate inclusion of non-wetland areas within the wetland enhancement area are appropriate to improve wholistic outcomes of these projects.

We appreciate the opportunity to review and comment on the proposed revisions to the National Handbook of Conservation Practices on behalf of wildlife and natural resource professionals. Please contact me via the information below if you have any questions about these recommendations.

Sincerely,

Kelly O'Connor
Conservation Policy Manager, The Wildlife Society
koconnor@wildlife.org, (301) 897-9770 x322