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Ms. Foster Felt,

We are writing to you on behalf of the Madison Audubon Society (MAS) with comments on the proposed changes in guidance to the parts of the Knowles-Nelson Stewardship Program that enable non-profit conservation organizations and local units of government to protect land and water.

MAS represents approximately 3,000 members living in eight counties in southern Wisconsin (Columbia, Dane, Dodge, Iowa, Jefferson, Marquette, Richland, and Sauk). We have protected and restored hundreds of acres in Columbia and Jefferson Counties to high quality wetlands and prairies with assistance from the Stewardship Program. We have also acquired over 1,700 acres in Jefferson County and donated the land to the DNR – Zeloski Unit of the Lake Mills Wildlife Area – and to Jefferson County with the Rose Lake State Natural Area. Much of the land in Jefferson County was entered into the Wetland Reserve Easement Program, leveraging federal funds for the benefit of the state. All are open to the public for a variety of outdoor activities. We are most grateful for this partnership and hope that it can continue for many years.

However, partnerships like these will be strained and possibly eroded by the proposed changes in ranking criteria to the Stewardship Program, which has the apparent aim of stopping or severely restricting Stewardship grant assistance for non-profits and local units of government acquiring lands with agricultural potential. As explained further below, we feel this is an ill-advised and destructive policy. Its damaging effect will be strongest in the southern part of Wisconsin, where much of the land is or has been in agriculture production, and, notably, where Stewardship assistance is most needed. This part of the state has many land and water resources in need of preservation and restoration. It is also home to the greatest number of Wisconsin's residents, who benefit from the outdoor enjoyment made possible by the Stewardship Program.

Changes proposed to the Stewardship Program restrict purchases to land that is not considered agriculturally valuable, presumably to prevent large withdrawals of land from agricultural systems into habitats that do not directly make a cash profit (e.g., prairie, wetland). However, organizations such as Madison Audubon, individually and collectively, do not buy large amounts of productive agricultural land and certainly not enough to affect Wisconsin's farm community. When we do buy such land, some or all of the following conditions apply to justify the purchase and Stewardship assistance.

1. The parcel contains high quality and often rare habitat such as remnant prairies or wetlands.
2. The land lends itself to restoration — examples include land adjacent to a prairie with similar soils, a drained wetland, a neglected oak savanna, or a stream or spring badly impacted by older agricultural practices.
3. The land is adjacent to vulnerable high quality habitats and will buffer those resources from development or agricultural management that harms those resources. Often a landowner with

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such attributes on part of a parcel will only sell if the buyer is willing to purchase that entire parcel.

4. The landowner has a strong desire to preserve and improve certain conservation values of his or her land.

The first three examples probably do not need much elaboration. MAS currently has an opportunity in the fourth category that bears further discussion in light of this change in guidance and its ramifications. The land in question has been in the same family since 1840. For decades, most the land has not been broken by the plow and supports grasslands that supply organic forage for horses. As such it currently provides very good habitat for southern Wisconsin grassland birds, a cohort of species of highest concern to the DNR, which would be lost if the land were to revert to row crops. The landowner's most fervent wish is that his land not be plowed and that it gradually be converted into native prairie to improve the habitat for birds, monarch butterflies, other pollinators (which benefit nearby agricultural lands), and more. Acquiring this land would enhance the conservation of key species and open its fascinating natural and cultural history to the public. But it appears this guidance change would make Stewardship Program assistance most uncertain and protection of the land much more difficult to achieve. Further, the agricultural value of the land is already severely limited by the landowner's management and wishes. The loss of one source of feed for the few Illinois horse owners who are the farm's current customers does not pose a threat to the state, county, or town's farm economy.

A broader perspective of destructive trends in agricultural lands in Wisconsin also, we believe, demonstrates why this change is unnecessary. According to Farm Service Agency statistics from September 2006 to September 2016, the amount of land in Wisconsin's Cropland Reserve Program (CRP) declined from 616,707 to 238,305 acres. Most of these lost acres reverted to agricultural production, particularly corn and soybeans. While this generated some individual and social benefits, the effect on the environment was significant and quite damaging. Many bird populations declined and sedimentation and run-off to streams, rivers, lakes, and wetlands increased. At a local level, impacts could be more severe, unpredictable, and site-specific. For example, when a CRP field adjacent to MAS' Goose Pond Sanctuary was plowed up, a population of the state-endangered silphium borer moth was destroyed. MAS has been actively restoring mesic and wet-mesic prairie habitat in its sanctuaries in part to prevent the further decline of species like the silphium borer moth, eastern white-fringed orchid, black tern, and Henslow's sparrow, and prevent listing of others. Allowing the Stewardship Program to assist in the purchase of a much, much smaller amount of agricultural acreage which will then be managed to improve habitat for these and thousands of other species, reduce run-off, and enable the public to enjoy more of our outdoors is a modest but wholly positive and affordable response to such a big change to our landscape.

Some policy-makers are concerned about large losses in our agricultural acreage. The most effective way to meet such a challenge is to support our farmers with technical and marketing assistance to increase profitability of current products farmed on current acreage, and our rural towns and counties in their planning and zoning efforts to prevent destruction of and increase expansion of farmland. Several land trusts, such as the Natural Heritage Land Trust and the Driftless Area Land Conservancy, assist local farmers and local governments to preserve productive farm land through conservation easements or purchase of development rights programs. The DNR could do far more to preserve farm land by supporting such efforts rather than by refusing to help in protection of a relatively few acres with great conservation values.

Wisconsin has long been a world leader in the development of the field of ecological restoration, beginning with the world's first prairie restorations at the UW Arboretum initiated by Aldo Leopold, Norman Fassett and other leaders in the emerging field of ecology, and continuing to this day.

The proposed changes will severely restrict the practice of ecological restoration in the state and jeopardize Wisconsin's leadership and renown in a field that will only increase in importance going forward.

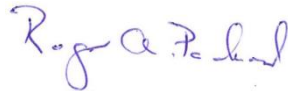
In addition to your careful consideration of our views, we respectfully ask that you share our concerns with the leaders of the DNR and its board. The Knowles-Nelson Stewardship Program has been vital in protecting and restoring superb ecosystems in Wisconsin, and its effective administration is critical to the protection of our land and water.

Thank you for your attention and for your hard work in managing many aspects of the Stewardship Program.

Signed,



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Cc:

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