Northwood Office Center 2215 Forest Hills Drive, Suite 39 Harrisburg, PA 17112-1099



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March 17, 2014

Mr. Nicholas DiPasquale Chair, Chesapeake Bay Program Management Board 410 Severn Avenue, Suite 109 Annapolis, MD 21403

Re: Draft Chesapeake Bay Watershed Agreement

Dear Mr. DiPasquale:

PennAg Industries Association is an agriculture trade association with more than 600 business members and has been in existence since 1878. Our mission focuses on working to create and maintain an effective, viable and competitive environment for Pennsylvania agribusiness to grow and prosper. We appreciate this opportunity to provide insight from the agriculture community of the Commonwealth on the draft Chesapeake Bay Watershed Agreement.

Overall, we appreciate and support the straightforward approach of the agreement.

Specifically, we support the flexibility within the agreement which will allow the States to elect which goals and outcomes to participate in. At no time, should it be construed that by not participating equates to the State not supporting that outcome. Instead, it is the exact opposite. States know what is needed in their geographic region to improve water quality. As often the case in the Commonwealth, we view the Bay as a local stream/water quality issue. If we focus on improving our local streams, tributaries and rivers, the benefits of that work will be noticed downstream. Is that not the intent of the Chesapeake Bay Watershed Agreement?

Goal and Outcomes: Sustainable Fisheries:

We support the over-arching theme but do not feel that the Commonwealth should be held accountable for this measureable. Therefore we would support Pennsylvania "opting out" of this goal. We do support the Commonwealth focusing on improving local water quality of impaired waterways in the State which would in turn ultimately help in meeting this goal for the other States.

Goal and Outcomes: Vital Habitats:

We support the intent of this goal however would caution for the consideration and inclusion of how invasive aquatic species factor into obtaining this goal.

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Goal and Outcomes: Water Quality:

We support this goal with reservations. We are optimistic that the revised Bay Model will properly capture what is occurring across the landscape, in particular, in the realm of agriculture. We strongly encourage all sectors (industry, university, local, state and federal) to work collectively to establish methods for crediting voluntary best management practices to the Bay States. This also brings the issue of nutrient trading forward as a key element in need of resolution. There are potential benefits of having a formalized structure for trading between States and between sectors.

Goal and Outcomes: Healthy Watersheds:

This goal has merit however; there must be a common sense approach to meeting this that addresses the growing population, dwindling acres available to produce food and fiber to meet the increasing demand. As the world-wide population is expected to double by 2050, the demand for food and fiber will escalate. We must approach this goal with the intent of balancing the need for healthy watersheds with the need to supply food and fiber to the world. We are the key to the global economy.

Goal and Outcomes: Land Conservation:

Again, this goal has merit but there is a need to balance it with growth. We must balance the need for human nourishment with the need for sound environmental stewardship. This can be achieved by all sectors continuing to have open dialogue and being willing to accept that there is no one right answer. That instead, an "al la carte" approach will most likely be needed to achieve the major goal of Chesapeake Bay Restoration. For example: advances are being made in animal feed and nutrition of animal diets — this will evolve over the coming years, we will need to balance advancements in all the sectors against demand for land and open space.

Goal and Outcomes: Public Access:

This is an admirable goal however; it would be one that we would support the Commonwealth of Pennsylvania "opting out of". Pennsylvania does not physically touch the Bay. We do not have the ability to improve public access.

Goal and Outcomes: Environmental Literacy:

We support the intent of this goal and again feel that the individual state is best suited to address how this should be achieved. In Pennsylvania, we have the Mobile Ag Lab affiliated with the PA Farm Bureau. The lab (6 in total) travel from school to school spending a week at

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each location educating 4th graders. This is just one approach that could be expanded to further meet this goal for Pennsylvania.

Additional Comments:

We do not support the inclusion of toxics in the Chesapeake Bay Watershed Agreement. At this time, it is not clear which toxics are of interest to the greater good. In addition, this is an issue best suited to be handled individually, by the States. Again, if all Bay States would approach Bay Restoration from the local stream standpoint, the issue of toxics would be addressed locally. The issue of toxics is highly scientific and best if omitted for the Chesapeake Bay Agreement at this time.

We recognize the emerging interest in Environmental Justice. There is merit for this topic to be a component of the Chesapeake Bay Agreement. Within Pennsylvania's Chesapeake Bay Drainage Area, we have diverse topography and diverse communities. To ensure that all citizens within the Commonwealth's Bay Drainage Area have access to information on their role in improving water quality is needed.

We appreciate the opportunity to provide comments on the agreement and would welcome the opportunity to address any questions or concerns that you or your colleagues may have.

Sincerely,

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Christian R. Herr, Executive Director, PennAg Industries Association