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

Dear Mr. DiPasquale and Management Board Members:

The USC is a coalition of 16 Soil and Water Conservation Districts in NY and 3 Conservation Districts in PA. Our mission is to protect and improve water quality and natural resources in the Upper Susquehanna River Basin. Please consider the following comments from the USC on the current draft of the Chesapeake Bay Agreement.

From the very beginning of the Chesapeake Bay Program, the USC has been involved and has engaged in a voluntary effort to improve NY's local water quality thru the use of our integrative, multiple barrier approach. The USC's multiple barrier approach was developed to include planning and implementation of restoration projects on a watershed basis. This approach allows us to address resource issues at the source in our headwaters, across the landscape, and finally at the stream edge. By developing multiple projects to address problems throughout the watershed, progress can continue and tangible results are achieved. This approach has increased the USC's success within the watershed and has allowed us to capture stakeholder interest by demonstrating progress through implementation such as Best Management Practices (BMPs) on our farms, working with municipalities on stream rehabilitation programs and trainings, and restoration of wetland areas with local landowners to name just a few. The USC's philosophy in regards to the bay program has always been to work to identify local watershed issues and concerns that ultimately provide downstream benefits, and address them on a voluntarily basis. As a result of this continued effort and at the encouragement of NYSDEC, we have reviewed the proposed Chesapeake Bay Agreement.

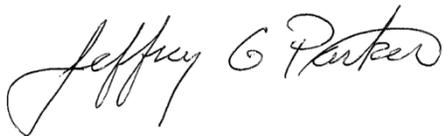
Our comments are not directly related to the language of the agreement, but rather our concern about the implications of signing it. NY would be agreeing to potential management strategies that have not yet been developed and may not align with NY's needs. These management strategies would have the potential to affect our agricultural communities, municipalities and economic development across the region. New York's intent and interpretation of signing this agreement and committing to collectively advance the goals, and the interpretation and expectation of the other signatories may be vastly different.

The USC remains committed to the improvement and protection of water quality in the Upper Susquehanna River Basin and will continue to work with the agricultural sector and municipalities to address local water quality concerns to the benefit of the bay. However the USC strongly feels that for ultimate success in the Upper Susquehanna River Basin it is critical that planning and implementation efforts address local community needs. One way to do this would be to develop management strategies that take into account the vast differences between the headwaters of the bay and those tributaries much closer to the bay itself. We suggest that if the Bay Program is sincere in getting local

community acceptance about sustainably managing their watershed, then it must address local problems with local solutions. In NY that means the bay program needs to recognize the importance of other issues like local flooding and the resource concerns that result.

The USC and our landowner partners will continue voluntary efforts to improve NY's local water quality and that of the bay thru the use of our integrative, multiple barrier approach to watershed management. Without the details of the management strategies, the ambiguity of this document leaves interpretation of its intent up to the reader. Local farmers and municipalities are reluctant to support a document, and the goals and outcomes within it, without a clear understanding of the expectations and responsibilities, or lack thereof that come with it.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jeffrey G. Parker". The signature is written in black ink and is positioned to the left of the typed name below.

Jeffrey Parker  
USC Chairperson