

December 9, 2009

The Honorable Tim Holden
Chairman, Subcommittee on Conservation, Credit, Energy and Research
1300 Longworth House Office Building
Washington, DC 20515

The Honorable Bob Goodlatte
Ranking Member, Subcommittee on Conservation, Credit, Energy and Research
1300 Longworth House Office Building
Washington, DC 20515

Dear Chairman Holden and Ranking Member Goodlatte,

We write today in regards to H.R. 3852 and the efforts to expand and reauthorize the Chesapeake Bay Program. We ask that these comments be entered into the Congressional record as part of the December 9, 2009 hearing to review legislative and regulatory strategies in the Chesapeake Bay Watershed before the House Agriculture Committee, Subcommittee on Conservation, Credit, Energy, and Research.

Across the Chesapeake Bay watershed and nation, our agricultural producers and organization members are very concerned about the implications of H.R. 3852 and believe it does not soundly or efficiently achieve the goal of improved water quality in the Chesapeake Bay. In effect, the legislation places a cap on the watershed's economic growth – impacting jobs, development, and food production. This bill will impose severe economic hardship to our industry and further increase pressure to the Chesapeake Bay's most effective and efficient land use, production agriculture, to move out of the watershed.

Through codifying executive and regulatory authorities, H.R. 3852 will hamper innovative solutions in areas such as nutrient trading, economic growth, farm adaptive management and overall water quality restoration. Without adequate time and science to effectively work through processes such as the drafting of the Chesapeake Bay Total Maximum Daily Load (TMDL), H.R. 3852 will impose burdensome regulations and penalties before defining procedures and practices that are proven to efficiently achieve desired water quality goals. This accelerated course of action is expensive and damaging to the watershed's economy, viability of our agriculture sector, and overall water quality objectives.

The agriculture sector in the Chesapeake Bay watershed has a strong history of being a responsible and proactive environmental steward, both through compliance with existing regulations and through implementation of voluntary conservation practices. However, a significant amount of conservation practices implemented by agricultural producers have not been given accurate credit in decision making models. H.R. 3852 will create a system of burdensome regulations without understanding the full impact of water quality improvements from implementing additional requirements on agriculture. Reauthorization of the Bay Program

should enhance the current Chesapeake Bay Model to ensure it is based on comprehensive and accurate data.

We ask the Subcommittee on Conservation, Credit, Energy and Research to support reauthorization of the existing Chesapeake Bay Program without dramatically expanding federal authorities. We believe adequate time should be given to develop creative ways for economic recovery and growth to partner with water quality goals, as well as to refine the science and modeling in the watershed. We are committed to developing strategies to protect all resources within the Chesapeake Bay watershed, including family farmers and other agribusinesses. Our organizations look forward to continuing discussions with you regarding this critical issue and thank you for the opportunity to comment.

Sincerely,

Agri-Mark, Inc.
American Farm Bureau Federation
Association of Virginia Potato & Vegetable Growers
Central Virginia Nursery & Landscape Association
Cooperative Milk Producers Association
Dairy Farmers of America, Northeast Council
Dairyalea Cooperative Inc.
Delaware Maryland Agribusiness Association
Delmarva Poultry Industry, Inc.
Environmental Resources Coalition
Maryland Association of Soil Conservation Districts
Maryland Cattlemen's Association
Maryland Farm Bureau
Maryland Grain Producers Association
Maryland Pork Producers Association
Maryland & Virginia Milk Producers Cooperative Association, Inc.
Missouri Corn Growers Association
National Association of Wheat Growers
National Cattlemen's Beef Association
National Chicken Council
National Corn Growers Association
National Council of Farmer Cooperatives
National Milk Producers Federation
National Pork Producers Council
National Turkey Federation
New York Corn Growers Association
Oklahoma Wheat Growers Association
PennAg Industries Association
Pennsylvania Cattlemen's Association
Pennsylvania Center for Beef Excellence
Pennsylvania Farm Bureau
Pennsylvania Pork Producers Association

Pennsylvania State Grange
South East Dairy Farmers Association
Southwest Virginia Agricultural Association
St. Albans Cooperative Creamery
The Fertilizer Institute
United Egg Producers
United States Poultry and Egg Association
Upstate-Niagara Cooperative
Virginia Agribusiness Council
Virginia Cattlemen's Association
Virginia Christmas Tree Growers Association
Virginia Cotton Growers Association
Virginia Crop Production Association
Virginia Farm Bureau Federation
Virginia Forage & Grasslands Council
Virginia Forest Products Association
Virginia Golf Course Superintendents Association
Virginia Grain Producers Association
Virginia Green Industry Council
Virginia Horse Council
Virginia Nursery & Landscape Association
Virginia Peanut Growers Association
Virginia Pork Industry Association
Virginia Poultry Federation
Virginia Sheep Producers Association
Virginia Soybean Association
Virginia State Dairymen's Association
Virginia State Horticultural Society
Virginia Turfgrass Council
Virginia Wineries Association
West Virginia Poultry Association