



National Association of Conservation Districts

To: Water Docket,
Environmental Protection Agency,
Mailcode: 2822T,
1200 Pennsylvania Ave., NW.,
Washington, DC 20460.

Subject: EPA Docket ID No. EPA-HQ-OW-2010-0164 - Comments on guidance for Federal agencies in the Chesapeake Bay

Conservation districts are working diligently to help achieve restoration of the Chesapeake Bay. As a part of the conservation delivery system districts are committed to making a difference in the watershed.

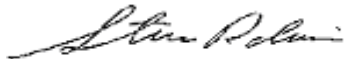
The National Association of Conservation Districts (NACD) represents 3,000 local conservation districts across the country, in several territories, and the Pacific Islands. These districts are units of government established under state law to carry out natural resource management programs at the local level and have 17,000 governing officials committed to conservation serving on their governing boards. Conservation districts work with private landowners and local communities to carry out conservation programs. These programs help provide the necessary technical and financial assistance to landowners and land managers for the continued maintenance of healthy, productive lands, communities, and related resources.

Although the guidance document “provides information and data on land management practices for federal agencies with land, facilities, or installation management responsibilities...in the watershed”, the guidance is quite comprehensive in scope and addresses a number of issues of interest and consequence to the delivery of programs by conservation districts. Thus we will provide these limited comments recognizing that EPA may in the future promulgate more specific guidance with direct affects on district programs.

We agree that the proven agricultural, forestry, stormwater and other conservation practices may have utility on the federal lands within the watershed especially the more extensive holdings such as the military installations and the wildlife refuges. We also believe that all of the land uses in the watershed need attention and treatment when it is identified as a source of nutrients or sediment. Thus the special emphasis on the agricultural sector as the primary target for action appears to miss the need for holistic action in the watershed. Conservation districts have experience around the country in working with federal installations especially the large military bases such as exist in the Chesapeake Bay Watershed.

The 121 conservation districts in the Chesapeake Bay watershed are successfully using the practices, systems, tools, and programs described in this guidance. They are also testing and exploring new techniques to reach the land managers, owners and communities within the watershed with the appropriate technical assistance advice. As a general practice, districts help circulate new ideas and practices by early adopters to the wider community as soon as there are proven results. NACD and districts look forward to continuing to contribute to the restoration of the Chesapeake Bay effort. We plan to be a part of a ramped up effort over the next several years to continue helping to improve the quality of this estuary.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Robinson".

Steve Robinson
President