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PATRICK J. COFFIELD – COUNTY ADMINISTRATOR

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12-022

February 1, 2012

David Johnson
Director, Department of Conservation and Recreation
203 Governor Street, Suite 402
Richmond, VA 23219

Dear Mr. Johnson:

Augusta County is committed to continuing to work with the Commonwealth, Department of Conservation and Recreation (DCR), Headwaters Soil and Water Conservation District, the Augusta County Service Authority (ACSA), the agricultural community and other vested stakeholders to develop a plan to meet the goals of the Chesapeake Bay Total Maximum Daily Load (TMDL). Two of Augusta County's largest industries are agriculture and tourism-both dependent upon protecting the County's natural resources to keep them viable. We believe that it is beneficial to us all to work together to achieve the goals embodied by the Chesapeake Bay Act. We are dedicated to protecting our local waterways, the Shenandoah River and the Chesapeake Bay.

To this end, Augusta County created a team with representatives from our Community Development Department, the local Virginia Cooperative Extension office and the Augusta County Service Authority (ACSA) to develop a response to your letter dated November 9, 2011 regarding Virginia's Phase II Watershed Implementation Plan (WIP). We have attended meetings and work sessions held by the Central Shenandoah Planning District Commission (CSPDC) and DCR and attempted to review the data supplied by DCR that is utilized by the model. Augusta County remains hesitant to rely on data calculated in the model and to use that data to quantify existing conditions on the ground and implementation measures necessary to achieve the 2017 and 2025 BMP scenarios. We have had neither the time nor the resources to allocate to this effort to respond fully to your November letter.

As previously stated, agriculture is an industry of primary economic and social importance in Augusta County that has historically relied on practices of sound environmental management for sustainability and continued productivity. Augusta County understands that the model data for agricultural BMPs was generated from various cost-share programs administered around the region. We are concerned about the possible inaccuracies and deficiencies in the data as reported, especially as it relates to BMPs that have been installed voluntarily, without the benefit of federal or state funds. Further, we believe that some of the projected BMP implementation goals are unrealistic; however, with the lack of staff, financial resources and time provided to evaluate and correct the acreages and allocations requested, providing updated data was impossible. In addition, we believe the model should reflect goals that are attainable by implementing scientifically beneficial BMPs. For example, livestock stream exclusion has been demonstrated to be effective for nutrient management. However buffer width has created debate over effectiveness and complicates a load reduction goal. The model is complicating implementation of this popular BMP.

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We see it as a benefit to the county, region and state as a whole to develop and implement a system to capture the voluntary agricultural BMPs that are currently in use to make this data more accurate and think this should be funded by the state and administered on a local level where relationships already exist. Augusta County will continue to rely on the Commonwealth and the Headwaters Soil and Water Conservation District to aggressively fund and administer existing and expanded programs that encourage the installation of scientifically defined agricultural BMPs.

Further, the ACSA was able to verify the allocations and delivery factors for the sewage treatment plants that they own and operate. The plants are sized to account for future growth targeted for our urban areas under the Augusta County Comprehensive Plan 2007-2027. The ACSA is dedicated to making state mandated upgrades to their large wastewater treatment plants.

In regard to land use-land cover, Augusta County agrees with the assertions made by the Central Shenandoah Planning District Commission's submittal for area localities in that we would also like to recommend that DCR take on the challenge of obtaining more accurate, higher resolution land cover data. This is one area in particular where we are not clear on how the numbers were derived for the BMPs. Like many other localities, we do not maintain land cover data compiled in the categories used in the model and we are in no position to create such data due to staff and budget constraints, at this time. We would like the assurance that the load reductions assigned to the County can be authenticated on the ground, outside the model.

Augusta County remains concerned about the high cost of implementing the Chesapeake Bay TMDL. We believe increased, consistent funding is needed from federal and state sources to lessen the financial burden on our constituents of implementing the strategies that will be necessary to meet projected load reductions. We encourage DCR and the EPA to develop cost-effective, practical and scientifically proven strategies for meeting reduction goals at the local, regional, or state level and achieve the shared goal of a healthy Chesapeake Bay and its contributing watersheds.

Augusta County appreciates the opportunity to work with DCR on this important endeavor.

Sincerely,



Patrick J. Coffield, County Administrator

PJC/rra

cc: Timothy Fitzgerald, Director of Community Development