



August 20, 2009

Mr. J. Charles Fox, Senior Advisor
Chesapeake Bay Program
410 Severn Avenue, Suite 109
Annapolis, MD 21403

RE: Chesapeake Bay Accountability

Mr. Fox:

My name is Doug Valentine and I am the Agricultural Specialist for the Fulton County Conservation District located in south-central Pennsylvania. I've been employed with the District for nearly 4 years and before that, I worked for the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) for 40 years as a Soil Conservationist and District Conservationist. I spent my last 22 years with Maryland NRCS working in Carroll County. I was a charter member of the Upper Potomac Tributary Strategy Team and served on the Trib Teams for the Upper Western Shore and Patapsco/Back River. Carroll County drained into three different watersheds. I took my appointment on the Trib Teams very seriously, but in the end, was quite disappointed with what we had accomplished.

Working for the NRCS, I utilized the 9-step conservation planning process. Steps 3 and 4 are to "inventory the resources" and "analyze the condition of the resources." Ever since I was a young soil conservationist back in the late 1960's, it has always concerned me that we never had a systematic method to document what was on the ground and what its condition was. I always thought that there should have been a "checklist" to ensure that we looked at, and evaluated, all pertinent aspects of the farm operation.

Finally in the early 1990's, I developed my own inventory, assessment and planning procedure. At that time, it was just a hardcopy "checklist" to be filled out and included in the landowner's case file; nonetheless, at least the planners had a tool that directed them to consider and document all of the environmental concerns on the farm. In addition, a numeric value was assigned to each resource concern that had been identified; the value given was based on the level of environmental impact. My hope was that I could find someone who would develop this method into a computer program.

When I began my employment with the Fulton County Conservation District (FCCD) in January of 2006, the Commonwealth's Departments of Environmental Protection (DEP) and Agriculture (PDA) were in the process of updating the Nutrient Management Regulations under Act 38 – the Agriculture, Communities, and Rural Environment (ACRE) Initiative. The Initiative included funds for DEP to provide grants to Districts directed at the development of a framework and pilot tools to guide the districts' role in agriculture erosion and sedimentation compliance and compliance with Nutrient Management Plans. This was a golden opportunity for me to get my inventory, assessment and planning procedure developed into a working model through a grant obtained by the



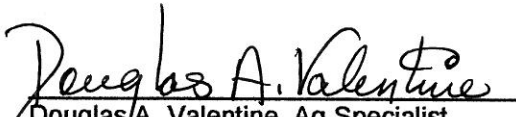
FCCD. We completed our pilot project on 20 farms for 2,980 acres. We were able to demonstrate the level resource concerns on those properties (See {6} Resource Concern Values).

According to a recent newspaper article ("Chesapeake Bay gets 'D' grade from foundation" The Herald-Mail, Hagerstown, MD) on the condition of the Chesapeake Bay, the Chesapeake Bay Foundation (CBF) gave it a "D". The Environmental Protection Agency (EPA) is looking for a way to improve the accountability and performance of the Chesapeake Bay Program. Living in Maryland and paying my annual "flush" tax, I am very concerned about the massive amounts of money being pumped into projects to protect and improve the Bay and the piecemeal manner in which it is done with little or no improvements in the overall quality of the Bay.

I am proposing that a more systematic, detailed approach be utilized to comprehensively document the conditions on the agricultural lands draining into the Chesapeake Bay. The key to this proposed approach is that 21 environmental concerns will be evaluated and given a numeric rating of 1 – 4 (1 = no water quality issues, to 4 = major water quality issues) for each tax parcel, farm or tract within a watershed. I have enclosed a booklet containing hardcopies of the computer program and what the final product looks like which outlines how the inventory, assessment and planning procedure works. My hope is, that someone within your organization would take the time to review this information (at least review the document entitled "#6 Resource Concern Values"), with the further hope that if the reviewer thinks it may have merit, that I could meet with them to explain it in more detail and answer any questions.

The final products generated by this proposed approach are high-quality, "soil conservation and water quality plans" that contain the necessary information to demonstrate what level of conservation and water quality is actually on the ground and what additional conservation practices are needed to address any unanswered water quality concerns. These soil conservation and water quality plans would demonstrate which sub-watersheds and on which agricultural operations we should be concentrating our funds in order to get the biggest bang for our buck. The Fulton County Conservation District Board of Directors supports these efforts. I hope that you will take the time to study this proposal and share it with others in your organization or others in the environmental community.

Sincerely,


Douglas A. Valentine, Ag Specialist
Fulton County Conservation District

Enclosures – 1

cc: David Kindig, Chairman, AG N&SRW/DCR
Jeff Lape, Program Director, CBP
William Baker, President, CBF
Kim Coble, Executive Director, CBF
Carin Bisland, Director, EPA-CBP
Lou Etgen, Program Director, Alliance for the Chesapeake Bay
Amanda Tipton-Bassow, Project Director-Chesapeake Programs, NFWF
Hilary Harp Falk, Senior Manager, Choose Clean Water

