



Sustainable Chesapeake

Sustainable Chesapeake 3607 E Marshall St Richmond, VA 23223 804-477-7683 www.sustainablechesapeake.org

May 7, 2014

Dear Poultry Litter Subcommittee Members and Chesapeake Bay Program Agricultural Workgroup Members:

I am writing on behalf of Sustainable Chesapeake regarding the Poultry Litter Subcommittee recommendations to the Chesapeake Bay Program Agricultural Workgroup presented on May 1, 2014. First and foremost, we would like to thank the Poultry Litter Subcommittee members and the Chesapeake Bay Program staff that have worked in support of this subcommittee for their efforts to ensure that accurate data on the poultry industry is available to the Chesapeake Bay modeling team.

Sustainable Chesapeake is privileged to work collaboratively with poultry growers throughout the Chesapeake Bay region. We have been working with poultry growers in five Bay states to evaluate farm-scale thermal manure to energy technologies that can generate heat for poultry houses or electricity for the grid, and convert excess phosphorus into a saleable fertilizer commodity that can be transported to phosphorus-deficient regions.

It is our experience that Chesapeake Bay poultry growers and integrators are some of the most conservation-minded in the nation. Throughout the region, poultry growers have implemented nutrient management plans, installed poultry litter storage facilities, and are working collaboratively with conservation agency staff to install best management practices on their farmland. In addition to poultry grower efforts, integrators have contributed to poultry litter transportation programs, installed large-scale facilities for facilitating poultry litter transport (like Perdue's Agricycle facility), funded local environmental projects, and instituted the use of phytase, which has greatly reduced the amount of phosphorus in poultry litter.

While poultry growers and integrators are clearly willing to do their part to restore the Chesapeake Bay, recently they have expressed concerns that they are being asked to do more than their fair share because data used by EPA to estimate pollution loading from poultry production is out of date and over-estimating the poultry industry's contribution to Chesapeake Bay nitrogen and phosphorus pollution. These concerns have been supported by reports released by the University of Delaware and Virginia Tech that have highlighted various changes in

the industry over time with respect to poultry production that are currently not accurately captured in Version 5.3.2 of the Chesapeake Bay Program Model.

However, we are concerned that data the Poultry Litter Subcommittee has collected to date show trends in poultry production, poultry litter generation, and nutrient content (most notably for Delaware, Maryland, and Virginia) that appear to conflict with expectations that data currently being used by in the Chesapeake Bay Model is over-estimating the poultry industry's contribution to Chesapeake Bay pollution. In fact, it appears that more-recent data could potentially demonstrate the opposite in some poultry production regions of the Chesapeake Bay.

We would therefore like to strongly emphasize to the Poultry Litter Subcommittee and the Agricultural Workgroup that there is a high risk of misunderstanding due to this outcome and that significant investment in communications is warranted.

Given these findings appear to differ from expectations, we suggest that the Poultry Litter Subcommittee and the Agricultural Workgroup work closely with Chesapeake Bay Program staff to thoroughly explain these results to poultry growers and integrators. Communications along these lines could include:

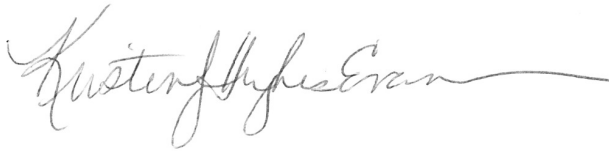
- A comprehensive report on the Poultry Litter Subcommittee's findings including a description of the partnership between industry, stakeholders, and EPA Bay program staff; members of the poultry litter subcommittee and agricultural workgroup; sources of data; findings to date on trends in the industry with respect to animal numbers and weight, poultry litter volume and nutrient content; explanation of industry changes that have led to changes in poultry litter volume and nutrient content; sources of information and data gaps; steps taken to address data gaps; and steps being taken to ensure accurate data will be included in the Chesapeake Bay model.
- A regional outreach strategy that includes stakeholder meetings in poultry production areas of the Chesapeake Bay with findings presented jointly by Poultry Litter Subcommittee partners and EPA Chesapeake Bay Program staff.

We would also suggest caution in including some but not all of the updated information on the poultry industry in Version 5.3.2 of the Chesapeake Bay Model, particularly if the outcome could lead to additional misunderstandings about trends in the poultry industry and confusion as to why some but not all updated information was included. If the Agriculture Workgroup decides to proceed with this recommendation, we would suggest that a thorough explanation for why some but not all available information was incorporated in the current version of the Bay model be included in the context of a comprehensive report on trends in poultry production that includes animal numbers, poultry litter volume, and nutrient content to ensure transparency and avoid additional misunderstandings.

Lastly, in presenting these results, we encourage the Poultry Litter Subcommittee, Agricultural Workgroup, and EPA Chesapeake Bay Program staff to emphasize the progress the poultry industry has made towards meeting Chesapeake Bay restoration goals, and to work with poultry industry leadership to explain these trends in context with regional industry production and management changes over time.

We hope these comments are helpful and again want to thank the members of the Poultry Litter Subcommittee, the Agricultural Workgroup, and the Chesapeake Bay Program staff for their efforts to address the poultry industry's concerns and ensure accurate data on poultry production and litter characteristics is available to the Chesapeake Bay modeling team.

Sincerely,

A handwritten signature in cursive script, reading "Kristen Hughes Evans", followed by a long horizontal flourish.

Kristen Hughes Evans
Executive Director