

CENTER FOR A LIVABLE FUTURE
Department of Environmental Health Science

September 15, 2015

Bill Satterfield
Delmarva Poultry Industry, Inc.
16686 County Seat Hwy.
Georgetown, DE 19947-4881

Dear Mr. Satterfield,

The Johns Hopkins Center for a Livable Future (CLF) is an interdisciplinary academic center based within the Johns Hopkins Bloomberg School of Public Health. The CLF leads research, policy, advocacy, education, and communication activities that address the public health and environmental implications of the food system, and continuously works to strengthen policy initiatives at the local, state, and federal levels. We support a moratorium on the construction of new poultry houses in Maryland until full implementation of the Phosphorus Management Tool in 2024 in order to prevent an increased burden on public health related to animal density and waste.

We are writing in response to your [comments](#) published yesterday on the “More Phosphorus, Less Monitoring” report by the Environmental Integrity Project (EIP). We have reviewed your criticisms with the report and the call for a moratorium on new poultry houses in Maryland, and we have three primary concerns with your response.

First, we want to clarify the growth of broiler production in Maryland. You write that in the last 10 years, the capacity of all Delmarva chicken houses declined by about 3 percent while the number of operating chicken houses went down 12 percent. You suggest that poultry production has stagnated since only a handful of chicken houses were built in Delmarva over the last several years, but USDA Production and Value statistics show that Maryland, Virginia, and Delaware actually produced 5.6 million more broilers in 2014 than in 2004 (1). In Maryland specifically, the USDA Census of Agriculture shows that the number of broilers sold from all Maryland Eastern Shore counties has increased in the past ten years (for which census data are available), from 286 million broilers sold in 2002 to 304 million broilers sold in 2012 (2). While the production statistics demonstrate a decline in Maryland broiler production in 2014, Figure 1 shows similar fluctuations in Maryland broiler production over the past 20 years but demonstrates relative stability in the Maryland broiler industry over time. Using information from county zoning boards, the EIP estimates that in just 3 Delmarva counties, over 200 new poultry houses are slated for construction by the end of 2015 (3). If each of these houses contains 27,000 broiler chickens at a time, there would be an additional 1.2 million pounds of poultry

manure generated each day¹ in the Chesapeake Bay watershed in 2016 (more than half the amount of waste generated by the citizens of Baltimore City) (4).

You also write that newly constructed chicken houses are allowed zero discharge of nutrients to waters of the state, implying that nutrients from manure from any additional poultry houses cannot end up in the Bay. This argument fails to account for the nutrient releases from cropland to which poultry manure is applied. As the EIP report and other studies describe, poultry operations regularly export manure to other agricultural land (5, 6); in 2013, 361 operations reported shipping a total of 215,349 tons of poultry litter—containing over 5 million pounds of phosphorus—to other locations, including other farms (5). Most of that litter remained within the Chesapeake Bay watershed: 73 percent went to other farmers, largely on the Eastern Shore (5). Focusing on the discharge of nutrients from poultry operations alone fails to account for the application of poultry litter to croplands, where the phosphorus load has become a problem and the majority of the excess nutrients in manure are left to seep into groundwater or run off into Bay tributaries.

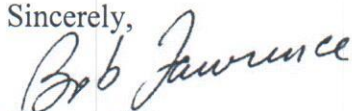
Lastly, you suggest that human population growth in the Chesapeake Bay watershed is responsible for a significant amount of water pollution. If we are targeting phosphorus pollution in the Bay, we are correct to focus on farms—and the nutrients from poultry manure—which account for the majority of phosphorus and sediment pollution to the Bay (7).

You point out that your industry has examined more than 70 proposed technologies to prevent cropland application of manure, but Perdue AgriRecycle is currently the only operating alternative use facility and received only 7 percent of the litter from 361 poultry operations in 2013 (5). Given that over 200 proposed operations are on track for completion by the end of 2015, these alternative uses of manure are not a realistic solution for current manure production or the forecasted increase in manure.

A moratorium on the construction of new chicken houses in Maryland is the State's best option to contain the growth in poultry manure generation and the pollution of the Chesapeake Bay. The projected rapid increase in animal production may be a desirable economic goal for Maryland poultry integrators, but it jeopardizes the health of the public and the Bay. It could also derail Maryland's attempts to meet the EPA's 2017 Total Maximum Daily Load limits. Expansion of poultry production needs to stop until there is a solution to the manure pollution problem.

Please do not hesitate to contact us if you have any questions.

Sincerely,



Robert S. Lawrence, MD, MACP, FACPM

The Center for a Livable Future Professor in Environmental Health Sciences

¹ Using data from the American Society of Agricultural Engineers on the amount of manure generated per finished broiler, assuming a 48-day finishing time period (4).

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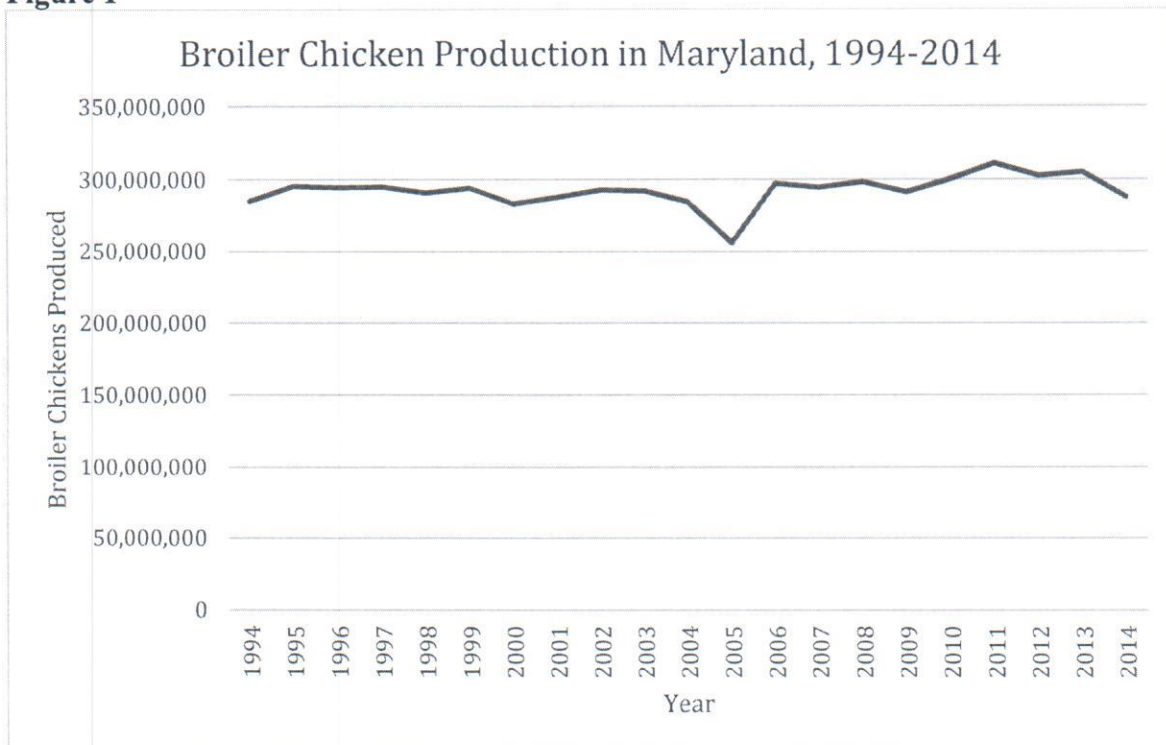
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Figure 1



References

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