



December 17, 2018

Mr. Ben Grumbles
Secretary of the Environment
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230

Dear Secretary Grumbles and Maryland Bay Cabinet Members:

The Delmarva Land and Litter Challenge (DLLC) represents a broad swath of environmental, agricultural, and other stakeholders working together toward a healthier Chesapeake Bay. The challenge that we face is to work with multiple stakeholders to create a sustainable poultry industry while minimizing environmental impacts to land and water from poultry farming on the Delmarva Peninsula.

Our diverse membership has identified poultry litter transport as one of our priority focal areas. Litter represents an excellent source of fertilizer for farmers that if managed correctly could be transported from areas with high nutrient levels to those that need more soil nutrients. Poultry litter is a valuable natural commodity, as it provides micronutrients that feed plants and restore soil health— that commercial fertilizer cannot. However, litter application and regional transportation solutions need to be improved to meet these needs.

We support the PMT evaluation as described in the legislation and have identified three adjustments at the state level that we believe would greatly improve litter transport, while also documenting its movement for nutrient tracking under Watershed Implementation Plans (WIPs).

The resulting summarized priority needs that we have identified are as follows:

1. Greater coordination between Maryland Department of Agriculture (MDA) and Maryland Department of the Environment (MDE) to allow a more transparent understanding of where litter is being transported from and where it is being applied. Specifically, DLLC members respectfully encourage a coordinated approach between MDE and MDA on the data obtained through the Annual Information Reports (AIRs) to develop a comprehensive understanding of how much poultry litter is being transported through the manure transport program, as well as private hauling. Providing a complete and transparent accounting of litter sources and recipients would create a more solid foundation for nutrient management planning around the poultry industry.
2. Improvements to Maryland's existing litter transport program to better support effective implementation of the Phosphorus Management Tool (PMT). We anticipate that with the full implementation of the PMT there will be a much larger volume of litter needing to be transported from the lower shore to more northerly Eastern Shore and western shore counties. Additional funding may be needed to support cost-share programs available to farmers and an educational/outreach efforts around the multiple benefits of litter application.

www.DelmarvaLandAndLitter.net

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3. Increased staffing support for the Soil Conservation Districts (SCDs). Maryland's SCDs are responsible for the planning and implementation of agricultural best management practices (BMP). Based on the goals set for WIP III, approximately 30 additional planners and technicians will be needed to maintain the current level of conservation and increase acres covered by Soil and Water Quality Conservation Plans and install the necessary BMPs to meet our 2025 goals. Additionally, many of these positions are entry-level and experience high attrition rates. In order to avoid extended training delays prior to completion of plans and designs, these positions should be compensated at a level that will attract experienced individuals.

We hope that you are able to share these recommendations with the rest of the Maryland Bay Cabinet members. At your earliest convenience, we would welcome an opportunity to have representatives of the DLLC discuss these ideas with you in greater detail. Please let me know if we can schedule a meeting with your office, or potentially the larger Bay Cabinet, in the near future.

Thank you for your time in reviewing our consensus supported recommendations. We firmly believe that an enhanced litter transport program in Maryland is an essential component toward both sustainable agriculture and a healthy environment.

Sincerely,

Jeffrey Horstman

Jeffrey Horstman
DLLC Chair