



P.O. Box 2277, Harrisonburg, VA 22801; 540-433-2451; [hobey@vaopoultry.com](mailto:hobey@vaopoultry.com); [www.vapoultry.com](http://www.vapoultry.com)

April 18, 2019

Dear Members of the Rockbridge Board of Supervisors:

I am writing to share some information and perspectives concerning proposed text amendments to the Rockbridge County Zoning Ordinance regarding livestock confinement facilities. Virginia Poultry Federation (VPF) respectfully requests your support of the amendments. VPF is a state trade association that represents all sectors of Virginia's poultry industry, including family farms which are affected by county zoning ordinances.

## **ECONOMICS**

Virginia's largest agricultural sector, the poultry industry contributes about \$13 billion annually to the Virginia economy; supports the livelihood of some 1,100 family farms; and employs more than 15,000 people. Much of the poultry industry is centered in the Shenandoah Valley close to processing plants, feed mills, and hatcheries. According to VPF's latest farm survey, Rockingham County has 483 poultry farms, Augusta County has 132, Page County 111, and Shenandoah County 67. The vast majority of these poultry operations are family farms that have diversified their farm income through poultry production contracts with processing companies. While the bulk of the farms are in the Central Shenandoah Valley, opportunities to raise poultry have extended in relatively small numbers to agricultural counties beyond the Central Valley region, including Rockbridge County. According to farm surveys VPF has conducted over the years, Rockbridge County has been home to 5-6 turkey farms for many years. I am aware of one new broiler farm constructed recently with two houses. As I understand it, there are an additional four broiler farms totaling eight additional houses in progress.

Due to capacity constraints of existing poultry plants in the Valley, it is unlikely that counties such as Rockbridge will come to enjoy the same quantity of poultry farms that have so benefited the Central Valley. However, Rockbridge is a desirable location for and can benefit from the relatively small number of facilities that will be needed as older poultry houses in the Valley are retired.

The poultry farms in the Central Valley have not only contributed significantly to the local economy and tax base, but have also provided farm income that has helped preserve farmland and open spaces. Reasonable zoning ordinances have enabled the location and operation of poultry farms in these counties over many decades. In the Central Valley, poultry farms coexist with residential land uses and other important economic sectors, such as tourism.

## PROPOSED SETBACK CHANGES IN ROCKBRIDGE

Opponents of poultry seem to suggest that the proposed amendments will open the floodgates to new poultry operations in Rockbridge County. This is not likely. The proposed changes mostly clarify existing policies, which are comparatively stringent among poultry producing counties. Even with the proposed changes, Rockbridge will remain more stringent than most poultry counties, which combined with capacity constraints of Valley poultry processing plants, Rockbridge's topography, and the county's distance from feed mills, hatcheries, and processing plants, will limit how many poultry houses will realistically come to the county.

The opponents of poultry farms seem to be focused on the proposed 100 foot setback of the production unit (houses, litter storage) from streams. Science, sound engineering, and established regulatory precedent support a 100 foot setback from streams for confined poultry operations and indicate the existing 600 foot setback is excessive. First of all, poultry houses and their accompanying production area (e.g., litter storage) involve dry waste, which is contained and protected from runoff, and are generally permitted as no-discharge operations. Birds are housed under roof during the life cycle of each flock, protecting waste from runoff. After each flock, farmers generally remove a portion of the waste, called litter (combination of manure and bedding material – e.g., wood shavings) from the growing houses and either store it in accordance with Virginia Department of Environmental Quality (DEQ) regulations, spread it in accordance with a state-approved nutrient management plan, or transfer it to other farmers for application in accordance with DEQ's regulations. Most growers have roofed litter storage buildings, but at a minimum DEQ regulations require storage sites that prevent storm water from running onto or under the stored poultry litter, separation from the seasonal high water table, and coverage of litter after 14 days. Storage sites not under roof must be at least 100 feet from any surface water, intermittent drainage, wells, sinkholes, rock outcrops, and springs.

Poultry farmers work hard to minimize spillage of litter during cleanout operations. However, it is important to consider any small amount of spilled litter in the production area in context with the fact that DEQ regulations and Virginia's science-based nutrient management standards allow for **land application** of 1-3 tons of litter per acre on farmland with a 100 foot setback from surface waters, reducible to 35 foot with a permanent vegetative buffer. The setbacks for **land application** are based on decades of scientific research and have been incorporated into nutrient management standards and criteria nationally. In this context, if science says 1-3 tons per acre is environmentally protective for land application sites, which already occur in Rockbridge for imported litter separately and irrespective of any local poultry farms, then any small spillages in the production area should not be of concern at a 100 foot setback. If properly engineered and managed, a poultry house is largely as protective with a 100 foot as a 600 foot setback from a stream. If science says a 35-100 foot buffer is protective for land application, then a 600 foot buffer for a production unit which exposes exponentially less litter to runoff potential would seem to be overly restrictive.

During the Planning Commission meeting, opponents presented charts that compare Rockbridge County's setbacks with several others, including Bedford, Campbell, Dinwiddie, Greensville,

and Northampton, which have much larger setbacks than Rockbridge. With just one exception, those counties have something in common: They have NO commercial poultry farms.

I previously provided county staff with a spreadsheet (attached hereto) that compares Rockbridge County to other counties that actually have poultry farms in them. Rockbridge is on the stringent end of those counties – stringent enough to significantly limit development of poultry farms but not so much as to prevent them altogether. That is probably the better comparison rather than comparing Rockbridge to counties whose setbacks, in addition in some cases to their distance from processing plants and other poultry industry infrastructure, largely prevent poultry altogether.

Finally, the county may find it helpful to review a recent Virginia Marine Sciences Institute (VIMS) study on the impact of poultry operations on local streams in Accomack County. The study measured water quality impacts after rain events to streams near new poultry operations and also away from poultry operations, and did not find storm water runoff impacts from poultry operations. The study, which is attached, is relevant to the county's deliberations and supports a 100 foot buffer over a 600 foot buffer from streams. Accomack County has adopted fairly stringent setbacks for poultry houses, but does not have one specifically for surface waters.

## **MICONCEPTIONS ABOUT POULTRY FARMS**

### *Odor*

Properly operated poultry houses emit minimal odor. This is due to advancements in ventilation and drinking systems for poultry production houses that keep them relatively dry and thus free of any significant odor. The vast majority of poultry farms are family operated and, in many cases, the operators and their families live next to, or in close proximity to, the production houses.

### *Air emissions*

The adoption of the tunnel ventilation system for poultry houses, which places all of the exhaust fans at one end of the house and concentrates the exhausted air, has caused some to perceive that these fans can cause problems for neighbors. The purpose of the tunnel ventilation system is to bring more fresh air into the house and move it through at a faster rate to cool the birds. These systems have been very successful in reducing the negative effects of hot weather on the growth and mortality of birds. The exhausted air from tunnel ventilation fans, however, only extends about 50 feet from the houses before it is dispersed into the atmosphere.

A University of Georgia [study](#) concluded that ammonia emissions from poultry houses dissipate rapidly within the first 300 feet downwind. At no time during the study did ammonia concentrations measure at or above federal odor detection standards of 5 – 50 ppm. At 100, 200, 300, and 500 feet, ammonia concentrations were less than 1 ppm in approximately 60, 75, 85, and 90% of the observations, respectively.

## *Poultry Waste Management*

Another trend over the past 25 years is significant improvements in the environmental management of poultry farms. This has occurred both in a voluntary manner as farmers have gained new information through scientific advancements, as well as through a comprehensive regulatory program adopted in Virginia.

In 1999, the General Assembly passed the Virginia Poultry Waste Management Act. The law charged the State Water Control Board with developing a regulatory program requiring a general permit, incorporating a state-approved, phosphorus-based, nutrient management plan and mandating environmentally protective waste storage and mortality management. The program, which also requires extensive record-keeping, DEQ farm inspections, and tracking and regulatory oversight of litter transferred off poultry farms, is implemented through the Virginia Pollution Abatement (VPA) General Permit Regulation for Poultry Waste Management.

Finally, the siting work and stormwater controls required for new poultry houses is much more rigid than when poultry houses were built in the past. These facilities are engineered, at considerable expense to poultry farmers, and permitted to meet stringent controls of precipitation based runoff.

## **CONCLUSION**

Virginia's poultry industry is committed to sound conservation practices that achieve environmental quality goals while maintaining a positive economic climate for poultry farmers. We are committed to being good neighbors and supporting local communities. VPF appreciates the opportunity to provide this information and hopes to be helpful to the County in understanding the facts about commercial poultry production. We ask that you vote in favor of the proposed amendments.

Please feel free to reach out to me at [hobey@vapoultry.com](mailto:hobey@vapoultry.com) or on my cell phone at 540-478-8199 if I can answer questions or provide additional information. Thank you for your consideration.

Sincerely,



Hobey Bauhan  
President

Attachments (2)