



**U.S. Poultry & Egg
ASSOCIATION**

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April 3, 2002

Ms. Sheila E. Frace, Director
Engineering and Analysis Division
Environmental Protection Agency
3000 Ariel Rios Federal Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20004

Re: Petition Concerning Dry Litter

Dear Ms. Frace:

Thank you for your response to the referenced petition filed by Dr. David Meeker on behalf of the National Turkey Federation, National Chicken Council and U.S. Poultry & Egg Association, et al. Please note that this letter is being submitted on behalf of all three organizations.

One of the reasons our associations filed the petition was to ensure EPA understood the lessened environmental risk associated with dry litter operations. As Dr. Meeker pointed out, our organizations undertook a detailed grower environmental survey last year. We received in excess of 16,000 responses to the survey – which represents 50 to 60% of the family farms engaged in broiler and turkey meat production in the nation. That survey indicates that the proposed CAFO rules impact on dry litter poultry producers *by an order of magnitude* greater than other animal agriculture sectors (graphic attached). Given the lower environmental risk associated with dry litter operations, and the fact that litter is a salable commodity producing family farm income unlike wet manure, we are very concerned by the extent of proposed regulation in dry litter. We are encouraged by your stated goal to “reduce the risk of environmental harm while minimizing cost and regulatory burden”.

For your information, I have attached a summary article on the grower environmental survey that appeared in the January 2002 issue of “Poultry USA”. Note that survey results were submitted to EPA during the comment period.

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Please do not hesitate to contact any of our organizations for additional information, questions or comments.

Sincerely,

John E. Starkey, P.E.
Vice President, Environmental Programs
jstarkey@poultryegg.org

JES:eh

Attachments

c: Don Dalton
Dr. David Meeker, NTF
Jean-Mari Peltier, USEPA
Mr. Steve Pretanik, NCC