

June 8, 2009

Carole Cook
U.S. EPA
Office of Atmospheric Programs
Climate Change Division
Mail Code 6207-J
Washington, DC 20460

Dear Carole,

I am enclosing comments on the proposed Mandatory Reporting of Greenhouse Gases rule published in the Federal Register on April 10, 2009. The attached comments deal exclusively with section JJ, Manure Management, of the proposed rule.

These comments have been written by an interdisciplinary team of scientists in the University of Missouri Commercial Agriculture Program. Each of these faculty members, Drs. Lory, Massey and Zulovich, have been involved with manure management research and education for over a decade. They contributed significant comments to the EPA on the National Pollutant Discharge Elimination System Permit Regulation and Effluent Limitation Guidelines and Standards for Concentrated Animal Feeding Operations in 2001, 2002 and again in 2008. Their comments on this proposed rule bring both experience and academic rigor to the issue of greenhouse gas emissions from manure management.

The MU team discussed their thoughts on the proposed rule with other faculty members from other universities, with agency personnel in Missouri and with others involved in animal agriculture. The insights of these others have been incorporated in these comments which I think you will find particularly helpful as you proceed with the proposed rulemaking.

Sincerely,



Dr. Rex Ricketts
Director, Commercial Agriculture Program