



National Association of Conservation Districts

March 27, 2008

Superfund Docket
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Docket ID No. EPA-HQ-SFUND-2007-0469

The National Association of Conservation Districts (NACD) is pleased to submit comments on behalf of the nation's 3,000 conservation districts relative to the above-referenced proposed regulation. Established under state law, conservation districts are local units of state government charged with carrying out programs for the protection and management of natural resources at the local level. Conservation districts work with nearly two-and-half million cooperating landowners and operators each year and provide assistance in managing and protecting nearly 70 percent of the private working lands in the coterminous United States.

NACD supports EPA's action under this proposed rule to exempt certain animal feeding operations from the administrative reporting requirements for air releases under the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Conservation districts across the country work directly with livestock producers to assist in developing, implementing and updating nutrient management plans. Conservation districts also work on outreach efforts within their local communities to educate both landowners and community residents on conservation practices that everyone can adopt, and frequently work to raise awareness of the importance of agricultural neighbors.

Conservation districts have become a resource for both agricultural producers and non-agricultural landowners to reach agreement on local natural resource needs and protection efforts. NACD supports continued efforts in local communities to work through issues of concern. With regard to CERCLA and EPCRA, we do not believe the intention was to include manure and other by-products produced during routine agricultural operations under these statutes. We support the EPA's action under this proposal rule.

Sincerely,

John Redding
President

National Headquarters
509 Capitol Court, NE, Washington, DC 20002
Phone: (202) 547-6223 Fax: (202) 547-6450
www.nacdnet.org