



NATIONAL GRANGE

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American Values. Hometown Roots.

Administrator Regan,

The National Grange is writing today to express the sentiments of rural America and the agriculture community about the EPA's revision of the 'waters of the United States' (WOTUS) rule. Since our founding in 1867, the National Grange has worked with administrations of both parties to create policies which support agriculture and rural America. Today, the National Grange serves as the national voice of over 150,000 rural Americans from all across the country. In this mission, we hope to work with you and the Environmental Protection Agency to create a WOTUS rule which protects the environment, property rights, and the farm economy.

Rural America and the agriculture community understand better than most the importance of conserving the natural resources we all rely on. However, this conservation must be pursued with a balanced regulatory approach which both protects our waters and allows farmers and ranchers to succeed. The WOTUS rule created in 2015 failed to balance these interests by creating an imprecise and overly inclusive definition of navigable waters which infringed on private property rights and imposed significant economic burdens on an already struggling farm economy.

To create a new WOTUS rule which avoids these mistakes, the EPA must respect farmer's and rancher's private property rights, not require permits for standard farm practices, and create specific regional/local regulations. On property rights, the regulation must be sure to not include bodies of water which exist solely on private property such as retention ponds and seasonal standing bodies of water. As well, the EPA must not return to the 2015 WOTUS rule practice of requiring permits for common and essential farm practices which overburdened farmers and ranchers who already faced tight margins. Yet more, to increase the precision and clarity of the rule, the EPA should work with the USDA to create localized definitions of navigable waters which reflect the different environments in different regions.

We hope that you take the experiences of our members into consideration in the rulemaking process, and look forward to a balanced final rule which both protects the environment and allows rural America and the agriculture economy to continue to thrive.

Respectfully submitted,

Betsy Huber
President
National Grange