

Georgia Cotton Commission
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November 3, 2014

Water Docket
Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Avenue NW.
Washington, DC 20460

Regarding the Definition of “Waters of the United States” Under the Clean Water Act

DOCKET ID: EPA-HQ-OW-2011-0880

The Georgia Cotton Commission (GCC) is a producer funded organization representing the cotton producers of Georgia. Georgia is the second largest cotton growing state with a \$1.3 billion farm gate value and a total economic contribution of \$2.5 billion to the economy of Georgia. The Georgia cotton industry also accounts for over 15,000 jobs in our state. Agriculture is the largest industry in Georgia accounting for over 375,000 jobs and has a total economic impact of over \$76 billion to Georgia’s economy.

After much review and consideration of the proposed rule regarding the definition of the “Waters of the United States” under the Clean Water Act (CWA) we are asking the EPA to withdraw the rule. We are co-signers of comments submitted by the Agricultural Nutrient Policy Council which outlines, in detail, our opposition to the rule. We believe the proposed rule would greatly impact the everyday operation of cotton farmers in Georgia by expanding federal jurisdiction well beyond current levels.

In addition to expressing opposition to the proposed rule, we would like to reiterate our concerns with the interpretive rule regarding Section 404 permit exemptions of the CWA. In our July 3, 2014 comment letter (EPA-HQ-OW-2013-0820) we urged the EPA to withdraw the interpretive rule as it adds confusion to existing cotton farming operations. We believe that the interpretive rule creates an unnecessary regulatory burden for farmers as it actually narrows, not expands, the exemptions for normal farming practices.

In conclusion, we urge the EPA to withdraw its proposed rule regarding the definition of the “Waters of the United States” under the CWA.

Sincerely,

Mike Lucas, Chairman
Georgia Cotton Commission