

I am Mark Johnson, Associate Director for Environmental Programs for the Golf Course Superintendents Association of America (GCSAA) Thank you for the opportunity to testify today on the ongoing efforts to replace the 2015 Clean Water Rule, also known as WOTUS.

GCSAA supports the CWA, opposes the 2015 WOTUS rule and supports efforts to replace it with a rule that both protects the principles of cooperative federalism, enables industry/responsible parties to proactively apply sound science practices to their land management activities that protect the environment without impacting business, jobs, and communities. We believe this new rule is a great step in a positive direction to benefit the United States at many levels including environmental management as well as commerce.

The EPA, Corps of Engineers and associated organizations should provide an easy to understand, implement and regulate policy or rule that enables land managers to achieve success. As a responsible industry, golf course superintendents utilize science based agronomic and environmental best management practices related to golf course management.

GCSAA appreciates the efforts of the EPA and Army Corps of engineers to create a definition of WOTUS that is not all encompassing of water features and better defines what water features are jurisdictional as well as those that are not jurisdictional. This new rule will allow land managers and owners, like those in golf, the opportunity to do the right thing while achieving their goals.

The complexity of including detailed science in definitions for intermittent streams, tributaries, etc. was identified within the federal register as well as the call for a more legal definition. While we do not want to diminish the science we agree that a more easily understood to implement and regulate rule/policy should be put in place at the federal level. Because of the environmental variation and complexity across the U.S. for items such as flow, duration, etc. we respectfully request the agencies to leave the federal rule at the perennial or traditional navigable waters level. Avoid the remaining ambiguities. Leave the remaining tributaries to states. Consider the stream evaluation programs in states like Virginia or Kansas. Initially we support the approach to wetlands including the clearly defined surface hydrology. Clearly define a structure channel or conveyance that is man made for jurisdictional streams and clearly exempt ditches and similar water features intended to manage surface waters for purposes like irrigation, drainage and runoff. Drawing the line at perennial waters/TNW's and leaving the rest to state regulation will help minimize the efforts for land owners and managers to best manage water features in an environmental and sustainable manner. If you must incorporate the intermittent language, then continue the best course for a more simplistic definition relying upon state authority as well.

This newly proposed rule is a great step in the right direction that will help many entities in the U.S.

Thank you