

To: Jackson, Ryan[jackson.ryan@epa.gov]
Cc: Robert Helland[RHelland@gcsaa.org]
From: Michael Lee
Sent: Wed 7/12/2017 4:37:56 PM
Subject: WOTUS Rescission Letter
GCSAA WOTUS letter to Adm Pruitt - 07.06.pdf

Ryan,

I hope you're doing well. I just wanted to send you a quick note regarding the letter submitted by our CEO, Rhett Evans, to Administrator Pruitt thanking him for his efforts to rescind and replace WOTUS. As I've mentioned to you in the past, this has been a primary issue and concern for the golf industry and we want to be supportive of your efforts as you work to implement a new rule. Elizabeth Tate Bennet mentioned she would submit this letter to the docket, but just thought I would shoot it to you as well.

I also wanted to introduce you by way of email to Bob Helland (cc'd here) who is our Director of Congressional and Federal Affairs based in Washington. Bob does a great job for us on the hill and wants to be a resource for you locally if you ever need anything from GCSAA.

Please don't hesitate to reach out to either one of us anytime if we can do anything for you and your staff moving forward on the WOTUS issue or any others under the EPA purview in the future.

Thanks Ryan. Take care,

Michael Lee | Manager, Government Affairs

Golf Course Superintendents Association of America

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July 6, 2017

The Honorable Scott Pruitt, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Administrator Pruitt:

I am writing to thank you for the recent rulemaking efforts to rescind the Clean Water Rule, which is part of a broader effort to develop a revised definition of “Waters of the United States” under the Clean Water Act. The Golf Course Superintendents Association of America (GCSAA) appreciates the Administration’s efforts to clarify the scope of federal jurisdiction over our nation’s waterways and consider the views of all stakeholders, including golf course superintendents.

The GCSAA opposes the Clean Water Rule, which has been temporarily stayed by the 6th Circuit Court of Appeals. Water plays a vital role in golf course operations: Of the 150 acres on an average golf course, 11 are comprised of streams, ponds, lakes, and/or wetlands for a total footprint of 161,183 acres nationwide. Unfortunately, the Rule would not clarify how many of those waters would fall under federal jurisdiction – and which would not. The definition of “tributary”, for example, includes ephemeral drainages that see a very small amount of water, such as following a rain event. If unchanged, this would cause concerns within golf course management.

Further, the Rule does not consider the voluntary conservation efforts already being done to protect water quality. The GCSAA is in the process of implementing its Best Management Practices initiative, which provides an easy-to-use, step-by-step guide to allow for all 50 states by 2020 to have a comprehensive BMP program focused on protection of water quality. It includes a dynamic planning guide with a BMP template for golf-centric organizations at the state level, and will also include tools to help golf facilities produce drought management, nutrient management, integrated pest management and water conservations plans with a focus on installation of: wet ponds, infiltration controls, catch basins, water quality basins, and vegetative filter and buffer strips. We are providing our superintendents with the foundation to produce quality turfgrass playing surfaces while protecting the environment.



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Golf is an economic engine for the economy, sustaining two million American jobs, with \$55.6 billion in annual wage income. In fact, one out of every 75 jobs in the United States is impacted by the golf industry. But beyond this, our golf course superintendents are committed to preserving the environment they live and work in. We look forward to working with you to develop a clear, common-sense rule that takes this into account.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rhett Evans". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

J. Rhett Evans
GCSAA Chief Executive Officer