



Minnesota Golf Course Superintendents' Association

Affiliated with the Golf Course Superintendents' Association of America

Dear Member:

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Golf generates 2 million jobs and \$69 billion to the U.S. economy annually. The proposed "Waters of the United States" rule puts this at risk. We urge you to vote for H.R. 5078, which rejects this approach and instead mandates the EPA and Corps to jointly consult with relevant State and local officials to develop recommendations for a regulatory proposal that would be consistent with applicable rulings of the United States Supreme Court.

On behalf of the Minnesota Golf Course Superintendents' Association, the Board and I are writing to urge your support for H.R. 5078, the "Waters of the United States Regulatory Overreach Protection Act".

The MGCSA, in the "land of 10,000 lakes", appreciates the intricacies of environmental stewardship and has been working closely with our state agencies to benefit the public in Minnesota. We are pursuing a BMP Certification Program, participate upon numerous agency committees including surface water, ground water, pesticide fate and pollinator enhancement. Our industry fully understands the importance of agency relationships. Additional regulations are not necessary as we develop beneficial partnerships.

H.R. 5078 would prohibit the Environmental Protection Agency and Army Corps of Engineers from continuing its efforts to develop the proposed "Waters of the United States" rule. We oppose this rule because it creates an unprecedented expansion of the regulatory authority of the federal government. Expanded federal jurisdiction would pre-empt traditional state and local government authority over land and water use decisions and alter the balance of federal and state authority.

We support the Clean Water Act (CWA) and recognize the need to clarify jurisdictional questions, but this proposed regulation goes too far. The proposed rule would make nearly every drop of water in America fall under federal jurisdiction.

Golf course superintendents are environmental stewards who work to protect the environment. We are the nation's leading practitioners of integrated pest management, a philosophy that reduces the potential environmental risks of input use. We protect water quality by applying physical, agronomic and environmental Best Management Practices (BMPs), such as correct mowing, IPM/nutrient management and other environmental practices. We support water quality protection laws and regulations that are based on sound science and credible data and promote the values of turfgrass and professionally managed landscapes.

The ability to provide a healthy turfgrass stand depends on being able to use the types of BMPs that would be prohibited if EPA denies a permit for them. The rule as written would also put golf courses operations at risk as we would be required to obtain expensive federal permits which may or may not be granted.

Respectfully Yours,

Roger Stewart CGCS