



July 6, 2025

The Honorable Sam Graves Chairman  
U.S. House Committee on Transportation and Infrastructure  
2165 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Graves,

On behalf of the members of the Golf Course Superintendents Association of America (GCSAA), I am writing to express our gratitude for the Amendment in the Nature of a Substitute (ANS) to H.R. 3989, the “Promoting Efficient Review for Modern Infrastructure Today (PERMIT) Act”. This legislation addresses clarity, consistency, and transparency concerns with the Clean Water Act (CWA) permitting process.

GCSAA is the professional association for the men and women who manage and maintain the game’s most valuable resource – the golf course. Water is integral to the design, construction, and maintenance of each golf course. Of the 146 acres on an average golf course, 5.7 are streams, ponds, lakes, and/or wetlands. Water features account for an approximate total footprint of 141,746 acres of the 2+million acres golf courses provide nationwide. Golf course superintendents utilize science-based agronomic and environmental best management practices related to golf course management.

The ANS includes three measures that GCSAA supports:

1. **NPDES Pesticide Permit Fix.** The ANS prohibits the EPA or states from requiring CWA National Pollutant Discharge Elimination System (NPDES) permits for chemical spaying activities made in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Products used for aquatic plant management are already subject to an intensive approval process to protect human health and the environment under FIFRA. Users who don’t follow the restrictions on the pesticide label are in violation of federal law without a NPDES permit; therefore, there is no need to complicate compliance by including additional duplicative and overlapping requirements under the Clean Water Act in order to achieve the desired positive public health and environmental outcome



2. **Excluding ephemeral features and groundwater from the definition of WOTUS.** The ANS codifies longstanding Waters of the United States (WOTUS) exclusions for ephemeral features and groundwater that have been included as part of WOTUS regulations over the years. These exclusions are vital to golf course operations as they provide needed flexibility without causing undue harm to the environment.
3. **State Assumption of Section 404 CWA Permits.** The ANS requires the EPA to undertake a review of the current regulations surrounding the state assumption process for Section 404 CWA permits in order to streamline the process and encourage additional states to take the lead in issuing these permits. Our experience has been that whenever a federal authority can be delegated to a state for implementation, the compliance, public health and environmental outcomes are always better. We support this better outcome.

The ANS is a first step in providing clarity and efficiency in the CWA permitting process. Thank you for your leadership and GCSAA looks forward to working with you on this legislation in the future.

Sincerely,

A handwritten signature in black ink that reads "Chava E. McKeel". The signature is fluid and cursive, with a long, sweeping underline.

Chava E. McKeel  
Director, Government Affairs  
Golf Course Superintendents Association of America