



## Northern Ohio Golf Course Superintendent's Association

1106 Royce ST. NW • Uniontown, Ohio 44685 • 216.469.9287

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**Mission Statement**  
Promoting the profession of the golf course  
superintendent through education,  
camaraderie and cooperation among fellow  
members in Northern Ohio since 1923

September 8, 2014

Dear Member:

On behalf of the Northern Ohio GCSA, we are writing to urge your support for H.R. 5078, the "Waters of the United States Regulatory Overreach Protection Act".

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.

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.

Sincerely yours,

Scott Brickley  
President of Northern Ohio Golf Course Superintendent Association