

Letter from the President



FLORIDA WEST COAST GOLF COURSE SUPERINTENDENTS ASSOCIATION
West Coast Wind

Your board took advantage of the opportunity offered to us in participating in a strategic planning session with Ralph Dain field representative of the G.C.S.A.A. to identify our strengths, challenges, opportunities and risks we are faced with annually. Goals were also set for the next twelve months with a time frame associated with each of them. I feel the chapter will benefit from the session as well as the board members that participated. Thank you Ralph and the G.C.S.A.A. for the learning experience.

I hope all of you will take advantage of the opportunity to join us at our upcoming events to learn and enjoy the camaraderie of your peers. We would all honor the opportunity to have you attend and participate in your association. Our next meeting is scheduled for May 19, at Lake Jovita. This is a joint meeting with the Ridge chapter. Education will be provided by Dr. Grady Miller and the topic will be foliar and granular fertilizer programming. This will be a 2 to 3 hour educational session with PDI and CEU points distributed accordingly. Take the time to look at our website to see when and where our next event is scheduled.

Thanks to Gerald Marquardt and his staff for hosting our March meeting. The golf course was in great shape as always and all who attended had a great time.

I hope all of you take the time to read "The Green Sheet." It will keep you up to date with what is going on around the state, upcoming events and some general comments.

Hope everyone is having a smooth transition and I look forward to seeing all of you at Lake Jovita.

Duane VanEtten, G.C.S. Cypress Run Golf

Time to Renew

It's that time of year again!

Renewal Notices will be coming from the State Association once again this year, even for vendor members. *Please be sure to renew your GCSAA membership also.* Our goal is to increase our membership numbers this year... please invite anyone in our industry that you come across who is not currently a member to learn more about the FWCGCSA. We would be happy to send a brochure or contact anyone that you feel might want to join... just send us an e-mail of who to contact.

Let's try to once again be the one of the first chapters to turn in our renewals!



Inside this issue:

Family Golf Month	2
Latest Winners	2
Executive Director's Report	3
Educational Opportunities	4
Board Member Nominations	4
Pro/Superintendent Challenge	5
Finally, the Grass has Started to Grow	6
Water Pollution EPA Proposal	7
More EPA Updates	9
Upcoming Events	10

Plan Now—July is Family Golf Month!

Throughout the month of July, affordable family fun is just a short par 3 away as PGA/LPGA Professionals nationwide encourage families to hit the links through special activities during the fifth annual Family Golf Month.



Family Golf Month provides a structured, yet casual, opportunity for families to learn the game of golf and spend uninterrupted quality time together. Every family member—young and old—can participate and receive the benefits a round of golf provides, including fresh air and beautiful outdoor scenery as well as a healthy dose of exercise.



Currently, there are more than 1,800 Family Golf Programs currently scheduled nationwide, including family golf clinics and play days, Take Your Daughter to the Course Week (July 5-11) and Bring Your Kids to the Golf Range (July). Consumers can find a complete list of facilities that are participating in Family Golf Month, along with details on specific events and online registration, by city and state on the Play Golf America Web site at PlayGolfAmerica.com.

WINNERS!!



CONGRATS TO PAT HICKEY ON HIS HOLE IN ONE!!!

Gross First

Van Etten & Cook

Second

Coyler & Wright

Third

Compton & Keisow

Net First

Haley & McCord

Second

Rackley & Hickey

Third

Shay & Harvey

Closest to the Pin

#7—John Tutko

#6—Glen Smith

#11—Joe Clay

#7— Ralph

#4—John Tutko



FGCSA Executive Director Update

Today is the last day of the regular legislative session in Tallahassee. By most accounts, a lot of unfinished business.

We did get passage of HB1445 which contains language aimed at some common sense and support of science in local regulations. It rescinds the ban on the sale of fertilizer during the "blackout periods" in local ordinances. It also calls for allowing fertilizer applicators with a limited certification to apply fertilizer during the blackouts, thus supporting the lawn-care businesses. The Senate Bill 382, I don't think was heard although we tried to urge them to do the right thing.

SFWMD is conducting an irrigation technology survey to get a handle on the various ways golf courses are addressing water conservation and to have a good solid case to make that golf courses and superintendents are proactive water managers.

Local ordinances on fertilizer use steam ahead with St. Lucie County adopting the State Model Ordinance which is good. Manatee County is leaning toward following the Pinellas blackout ordinance along with Hillsborough County since they all share Tampa Bay. Pete Snyder and Mac Carroway (FTGA) met with Manatee County staff to promote the state model and/or the comprise Orange County ordinance which allows certified lawn-care folks to apply during blackouts. More talks are planned. Interestingly Pete Snyder commented on the Tampa Bay Estuary Plan which defends current N and P levels in the bay when addressing the EPA Numerica Nutrient Criteria, but then caves into the more stringent Pinellas Ordinance when it come to lawn fertilizing.

Please urge all members to go online at www.gcsaa.org under Advocacy and Take Action tabs to make comments to legislators on the EPA NNC plan. Talking points are provided. EPA has slowed the process down, but will take it up in 2011. It will not go away by itself. We must push sound science and realistic conditions and not some computer model to protect our waterways.

Cordially yours,

Joel D. Jackson, CGCS, Executive Director
Florida Golf Course Superintendents Association
Email: FLGRN@aol.com

Update...

Mike Goldie called late Friday afternoon as the session was ending to report that the companion fertilizer Senate Bill 382 died on the vine hence the passed House Bill 1445 didn't have a partner to go to conferencing to produce a state law. Compromise attempts only watered the intent down and some of the senate leaders did not want to inflame the environmental

interests in this election year and home rule folks were out in force as well. A couple of water bills made it through but did not have any apparent consequences.

Reading the St. John's newsletter Mainstream the other day, it is apparent, new laws or not, that renewed permits in the future are not going to necessarily be rubber stamped and how they are calculated, especially for "big/high volume" users will be on the table—so make a list of all the technology and improvements you have made or planning to make and a list of how you monitor your system daily for leaks, efficient run time adjustment, etc, etc, etc to have your case ready when it's time to apply for renewal.

Below is the report on the UF budget from the IFAS lobbyist. At least some decent news.



FYIFAS April 30, 2010

The Florida legislature just passed the state budget, and the 2010 legislative session is about to end. UF/IFAS has cause to celebrate as our budget remains intact!

It kind fo feels like déjà vu as, in many ways, this session mirrors the last. After spending most of the session facing a reduction, we end this session with almost no cuts to our budget. Although jubilant, we feel like we just got off of the worst of roller coaster rides.

The final state budget is \$70.37 billion, compared to last year's \$66.5 billion budget. While beginning this budget building process with a \$3.2 billion deficit, the legislature used stimulus money and cashed in on state reserves and trust funds to help balance the spending plans.

It is impossible to describe the feeling of humbleness and gratitude for the many, many phone calls, letters and e-mails that were send to legislators from friends from every corner of the state expressing their support of IFAS. There are legislators who worked very hard for us throughout this long, hard-fought process. There are so many people to thank, and it is my pleasure to do so.

Mary Ann Gosa

**Get GCSAA education
points in 2010...
Compliments of
Aquatrols**



Aquatrols has once again received approval for GCSAA 2010 Education Points on several presentations. Andy Moore, Director of Marketing at Aquatrols, says "We believe it's important and mutually beneficial to provide opportunities for education and earning credits. We make the effort to get these presentations approved by GCSAA so superintendents can learn more about soil and water dynamics - and gain education points at the same time. Aquatrols' has been giving back to the industry in this way for many years and is happy to be able to continue to do so in 2010."

The non-commercial presentations span topics ranging from soil properties to water conservation and quality to irrigation audits and irrigation efficiency to soil surfactant chemistries. All of the presentations are given by Aquatrols employees and are offered at no cost to Superintendents and Organizations.

If you are interested in more information about available courses, or are interested in scheduling a course for your group or organization,

please contact Jana Hampton at jana.hampton@aquatrols.com or (856) 537-6003, or visit our website at: www.aquatrols.com for course listings and explanations.

**MAKE PLANS &
RSVP NOW....**

May Membership Meeting at Lake Jovita! See Page 10 for more info.



The FWCGCSA is seeking nominations for the 2010-2011 Board of Directors.

If you would like to nominate an individual to the Board, or if you are interested in serving on the Board or on a Committee, please send an e-mail to fwcgcsa@earthlink.net.

**CHAPTER
CHAMPIONSHIP**

Old Memorial • June 28th



THE 20TH ANNUAL PRO/SUPERINTENDENT CHAMPIONSHIP



PRESENTED BY:
WEST CENTRAL CHAPTER, PGA
FLORIDA WEST COAST GCSA

Monday
August 2, 2010
8:00 Registration/Breakfast
9:30 Shotgun Start
Steak Dinner & Awards
Presentation Following Play

For More Information:

Duane VanEtten
727.938.5832

Steve Martin
727.937.3191



FORMAT

Two Player Scramble

Pro/Super — Two Flights Low Gross/Low Net

Sponsor/Supplier — Two Flights Low Gross/Low Net

The winning low gross Pro/Super Team takes home the traveling WCCPGA/FWCGCSA Trophy

SPECIAL EVENTS

- Hole in One TBA
- Closest to the Pin/Closest to the Line
- Closest to the Pin Shoot-Out after play — \$200 Prize to winner
- Skins Game included for all teams

ELIGIBILITY

Current Members of the FWCGCSA & WCCPGA and their Sponsors/Suppliers

ENTRY FEES

- **FWCGCSA & WCCPGA Members**
\$250.00 Per Team (Skins Included)
Includes: Golf, Food, Beer & Soda, & Prizes
- **Sponsor/Supplier**
\$250.00 Per Sponsor
Includes: Hole Sign, Golf, Food, Beer & Soda, Prizes for one player
\$125.00 for additional player
Includes: Golf, Food, Beer & Soda, Prizes

TITLE SPONSOR

\$1,500 — Includes: Title Sponsorship, Hole Sign, Golf, Food, Beer & Soda, Prizes for two players

Finally, The Grass has Started to Grow



John H. Foy, Director, Florida Region
USGA
As printed in the USGA Green Section
Weekly Update, April 30, 2010

Everyone has been waiting for an extremely difficult and challenging El Niño winter to come to an end, and over the past couple of weeks temperatures throughout Florida are closer to normal for mid to late April. With daytime highs and nighttime lows in the 80 and 60 degree range across central to south Florida, both bermudagrass and seashore paspalum have resumed active growth and are recovering from winter traffic. The recovery process probably will not be completed before many seasonal golfers return to the North. In northern Florida and across the Panhandle, bermudagrass has greened up; yet until nighttime temperatures are consistently in the mid-60's range, active growth will not occur, regardless of inputs.

The resumption of turf growth is a good thing, but the trade-off is a small decline in putting speeds. A common complaint by low-handicap golfers is that the putting greens are much slower compared to just a few weeks ago. With the onset and persistence of below-normal temperatures in early January, bermudagrass putting greens entered into a semi-dormant stage, which yielded routinely fast putting speeds. At several courses recently, putting green speeds had declined by approximately one foot, yet speeds were still in the 10 to 10.5 range. It is amazing that this putting speed is not considered acceptable (too slow),

and there have been demands to further lower heights of cut and increase putting speeds.

In no uncertain terms, there is a real likelihood for negative consequences when pushing putting greens and maintaining extremely low heights of cut, including turf loss. This is especially true when coming out of the winter because carbohydrate reserves have been depleted and bermudagrass still is developing a healthy root system. It is more than height of cut. A highly integrated program includes frequent light topdressing, appropriate verticutting, growth regulator treatments, and regular double-cutting or cutting and rolling to produce optimum putting green conditioning. This is labor intensive, and with budget cuts mandated at many courses, being able to conduct these necessary practices in a timely and efficient manner is now much more of a challenge.

Although environmental conditions have not been conducive to warm-season turfgrass growth, they have been ideal for growth and maturing of cool season turfgrasses such as perennial ryegrass and *Poa trivialis*. For courses in the central and northern part of the state with winter overseeding programs, the concern for the next couple of months will be to accomplish a gradual, yet complete, transition out of the winter overseeding cover to avoid deterioration of course conditions. This is best accomplished with an active transition management program that gradually thins out the overseeding cover at the

same rate that the base bermudagrass is able to fill in and maintain turf coverage.

As soon as environmental conditions are favorable for bermudagrass growth, the transition process should be initiated. A key component is increasing fertilization to promote sustained growth, while slightly lowering the height of cut on greens, tees, fairways, and over-seeded roughs to begin thinning the overseed canopy so that more sunlight reaches the underlying bermudagrass. With over-seeded putting greens, weekly light verticutting or use of groomer attachments two to three times per week is suggested to continue thinning the overseeding cover. Care needs to be exercised to thin the overseeding cover without damaging the base bermudagrass.

With greens over-seeded with *Poa trivialis*, do not allow rapid loss due to the onset of heat and drought stress. When mid-80's temperatures occur in combination with windy and dry conditions, the greens should be closely monitored for heat and drought stress, and hot spots should be hand watered or syringed. On more than one occasion over the years, a fast and hard transition on putting greens occurred over a weekend, and then six to eight weeks was required for reestablishing bermudagrass turf coverage and achieve acceptable playability.

Water Pollution EPA Proposal: Nutrients in FL

EPA Proposal on Nutrients in Florida Waters Could Set Trend With Other States Targeted

When the Environmental Protection Agency proposed limits for phosphorus and nitrogen in Florida waters, it marked the first time the federal government has stepped in to impose numeric standards for nutrients when a state has failed to do so.

But it may not be the last. The agency already is under threat of a lawsuit by environmental advocates seeking federal action to set standards for oxygen-depleting nutrients for waters in Wisconsin. And other groups have filed a petition asking EPA to set water quality standards for nutrients in all navigable waters of the United States that lack approved standards.

The proposed nutrient water quality criteria for Florida published by EPA Jan. 26 would set a series of numeric limits for phosphorus and nitrogen pollution in the state's lakes, rivers, streams, springs, and canals ([75 Fed. Reg. 4174; 15 DEN A-7, 1/26/09](#)).

Nutrient standards could mean significant changes in the way wastewater treatment plants operate and in how farms handle fertilizers and manage runoff from their fields.

According to EPA spokeswoman Enesta Jones, the state might have to impose permit limits that would require water treatment plants to use advanced treatment methods, such as biological nutrient removal, as several systems in Florida already have done. For nonpoint sources, Jones said farmers could be asked to limit fertilizer application to "agronomically necessary" amounts, to install fencing to keep cattle out of streams and provide an alternative water supply, or to plant vegetation as buffer strips separating fields from water courses.

Rule Stems From Lawsuit The Florida action is the result of a recent federal consent decree that settled a lawsuit filed by environmental groups. The agreement requires EPA to develop standards for Florida waters during the next two years (*Florida Wildlife Federation v. Johnson*, N.D. Fla., No. 4:08-CV-324, 11/16/09).

"This case and this rule will be the template that other states and EPA will use to establish limits on fertilizer and sewage pollutants in other states," said David Guest, an attorney with Earthjustice, which filed the lawsuit on behalf of the National Wildlife Federation and others. "This is the beginning." Jones acknowledged that the Florida rulemaking "is precedent-setting in that it signals EPA's willingness to

and ability to work with states to use a variety of scientifically defensible approaches to develop numeric nutrient criteria and to use our authority under the Clean Water Act to ensure such criteria are put in place."

Nutrients such as phosphorus and nitrogen flow from stormwater runoff, municipal water treatment, crop fertilizers, and livestock manure. High nitrogen and phosphorus loadings cause harmful algal blooms, reduced spawning grounds and nursery habitats for fish, and lead to oxygen-starved hypoxic areas—or "dead" zones. The algal blooms block sunlight and result in the destruction of underwater aquatic vegetation, which serves as critically important habitat and food for many organisms, according to EPA. Algal blooms eventually die off and consume dissolved oxygen from the water column. Low dissolved oxygen concentrations kill aquatic organisms, resulting in decreased biological diversity and population, including fewer fish, the agency said.

EPA has relied on states to develop water quality standards for nutrients, but an August 2009 Office of Inspector General report criticized the agency for not holding states accountable for developing the standards and for not using authority under the Clean Water Act to issue its own rules ([165 DEN A-11, 8/28/09](#)).

According to EPA, 25 states have no standards whatsoever for nutrients. Of the remaining states, only seven have standards covering one or more nutrient for at least one entire waterbody category.

The Environmental Law and Policy Center and the Midwest Environmental Advocates, a coalition of Wisconsin environmental groups, filed a notice of intent to sue EPA in November 2009 to force the agency to set numeric nutrient limits in Wisconsin. They charged the agency with failing to perform its nondiscretionary duty under the Clean Water Act to promulgate numeric nitrogen and phosphorus criteria for the state.

Wisconsin Lawsuit Likely "This is in some ways a follow-up to Florida," Albert Ettinger, a senior attorney with the environmental law center and the lead attorney in the Wisconsin case, told BNA. "We don't know whether we'll be filing suit but we think it's likely. EPA has not formally responded because the agency has been working in Florida. We'll see what happens."

While nutrient pollution in Wisconsin is far

from the nation's worst, Ettinger said Wisconsin has developed the scientific detection criteria needed for detecting harmful levels. But opposition from state legislators has prevented the state from issuing a final rule, he said. In its notice of intent to sue, the coalition said nitrogen and phosphorus pollution in Wisconsin contributes to downstream water quality impairments, including a huge dead zone in the Gulf of Mexico more than 1,000 miles to the south that threatens numerous human and ecological communities as well as the health of the Gulf. It also affects downstream waters that flow out of Wisconsin, and phosphorus pollutes Lake Michigan, according to the coalition.

The Wisconsin action follows the filing of a petition in July 2008 by environmental groups seeking an EPA rule to require numeric limits for nutrients for all U.S. waters.

The petition asked EPA to prepare and publish numeric water quality standards for nitrogen, phosphorus, chlorophyll-a, and turbidity for all navigable waters of the United States that lack approved standards. It also asked the agency to prepare total maximum daily loads, essentially pollution budgets, for nitrogen and phosphorus for the Mississippi River and its tributaries and for the Gulf of Mexico. Among the states that could be affected are Arkansas, Iowa, Illinois, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, Tennessee, and Wisconsin.

Even if the agency disagrees with the petition's assessment that water quality standards should be established on a national basis, "EPA must at least establish standards to control nitrogen and phosphorus pollution within the Mississippi Basin," the petition said.

Four months after the petition was filed, the Minnesota Center for Advocacy followed up with a letter to EPA urging the agency to take action.

"The problems caused by nitrogen and phosphorus pollution are very bad, are getting worse, and are not being addressed," the center said.

Widespread Degradation Cited. "As in Florida, nutrient over-enrichment in the Mississippi River Basin is causing widespread water quality degradation both in freshwater tributaries of the Mississippi and the Gulf of Mexico," the center said.

Environmental groups have been meeting
(Continued on page 8)

(Continued from page 7)

with EPA regarding the petition, according to Ettinger, but are aware the agency “has been working very hard in Florida.” EPA has not formally responded to the petition, he said. “I think the work done in Florida, while not directly a legal precedent because of the clearly developed scientific techniques and principles for Florida, will have application for other states,” he said.

EPA has long identified nutrients as a major source of water pollution in the United States. In a national strategy outlined in 1998, EPA acknowledged nutrient pollution as a leading cause of impairment in lakes and coastal waters and the second leading cause of impairment in rivers and streams. The situation has not improved much since then. According to the most recent data on EPA’s website, nutrients are the fourth-leading cause of impaired waters, behind only pathogens, mercury, and other metals.

A Leading Cause of Impairment A state-EPA Nutrient Innovations Task Group issued an Urgent Call to Action in September 2009 in which it gave an indication of just how widespread the problem is. It said 14,000 water bodies in 49 states are listed as impaired from nutrient-related causes. This includes 2.5 million acres of lakes and reservoirs and ponds and 80,000 miles of rivers and streams.

These numbers, described in the report as an “underestimate,” were obtained from EPA’s National Summary of State Information on Water Quality Impairments, which addresses about 43 percent of the nation’s lakes, reservoirs, and ponds that have been assessed.

More than 47 percent of streams have medium to high levels of phosphorus and more than 53 percent have medium to high levels of nitrogen. In addition, the report by the task group cited 168 dead zones in U.S. waters and said 78 percent of assessed U.S. coastal areas show signs of eutrophication—a process in which high nutrient concentrations stimulate excessive plant growth.

Nutrient pollution reflects a doubling of the U.S. population over the past 50 years and is expected to accelerate, according to the task group. Urban stormwater, which is expected to increase dramatically with accelerating population, is a major source of nutrient pollution in heavily populated areas, the report said.

Current Tools Poorly Coordinated Current tools, such as numeric nutrient quality criteria, water quality assessments and listings, urban stormwater controls, publicly owned treatment works nutrient permit limits, and animal feedlot controls are under-used and poorly coordinated, according to the report.

Municipal wastewater treatment systems are among the nation’s most heavily regulated sectors, the task group said. Yet, of more than 16,500 municipal treatment system permits, only about 4 percent have numeric limits for nitrogen and 9.9 percent for phosphorus. A group of environmental organizations, led by the Natural Resources Defense Council, asked EPA in November 2007 to impose specific technology-based standards for removing nitrogen and phosphorus from effluent discharges by publicly owned sewage treatment plants. The agency has not issued a decision on that petition.

Another source of nutrient pollution, agricultural livestock, generates more than 1 billion tons of manure annually and a substantial portion is largely unregulated by an EPA rule on concentrated animal feeding operations, according to the report. Row crops are another source, but agricultural stormwater runoff and irrigation return flows are exempt from the Clean Water Act and subject to variable controls at the state level. The task group called for national leadership to support and require more consistent and fuller utilization of existing tools from state to state and source to source. “Establishing a cross-state, enforceable framework of responsibility and accountability for all point and non-point sources is central to ensuring balanced and equitable upstream and downstream environmental protection,” it said.

In addition to regulation, the task group cited other tools for controlling nutrient pollution, including voluntary agreements, corporate stewardship, trading, and voluntary monitoring.

States Asked to Develop Standards Under EPA’s 1998 strategy, states were given until 2003 to establish nutrient limits. The environmental advocates cited that strategy document when they issued the notice of intent to sue the agency. “EPA determined that prompt development of numeric standards for the nutrients phosphorus and nitrogen in all states was necessary to meet the requirements of the Clean Water Act,” the notice said.

Linda Eichmiller, executive director of the Association of State and Interstate Water Pollution Control Officials, told BNA the association is closely watching the situation in Florida but has not taken a position on EPA’s proposed rule. “Yes, it’s going to set a precedent, but we don’t know how it’s going to turn out,” Eichmiller said. Setting numeric nutrient limits “can be very expensive in terms of technology and an energy footprint,” she said. “It’s very important that criteria be backed up by sound science.” Nutrient standards, particularly for flowing water, can be extremely challenging due to limited science on what level is really an im-

pairment, Eichmiller said. “Some states have the science and some states don’t. We’re concerned that EPA not push states beyond the science.” Specifically, Eichmiller continued, only some states have determined a cause-and-effect link for nutrients in their streams, and conditions vary by hydrology. “It’s not going to be the same for the Louisiana bayous as in the headwaters of the Mississippi River,” she said. States are working on the issue, Eichmiller continued, and with or without nutrient numeric limits, a variety of management practices can also help address the problem.

Ettinger said that while state agencies have said scientific criteria for determining harmful nutrient limits is different in each state, “I have no reason to believe the algae in Iowa is a lot different from Minnesota and I suspect not a lot different from Florida. What’s going on in the Chesapeake Bay is relevant to the Mississippi Basin.”

Municipal Treatment Systems Concerned

Susan Bruninga, director of public affairs for the National Association of Clean Water Agencies, said she also thinks the proposed Florida rule “will set a precedent and other states will follow suit.” NACWA has several concerns, including the high cost of implementation. If a final rule focuses on point sources of pollution and not enough on non-point sources, municipal wastewater treatment plant systems will be faced with higher treatment costs, Bruninga said. “We hope EPA will provide some flexibility in how this is implemented,” she said.

In addition, she said EPA’s method for determining nutrient levels is a big concern for NACWA. “We don’t think [EPA’s proposal] draws clear links between nutrient concentrations and the aquatic environment,” Bruninga said, noting it sets criteria for broad ecological regions “but doesn’t actually factor in a condition for a specific water body.”

Guest said the proposed rule is encountering “incredible opposition” in Florida. Under the proposed rule, he said, the pollution limit for phosphorus would be 100 parts per billion in many areas. Sewage treatment plants discharge between 5,000 and 10,000 parts per billion, he said. “You can see why they’re upset,” he said. “There are no standards.” He also pointed to pollutants from nonpoint sources, adding, “agriculture’s had a free pass.”

Even More EPA News!

U.S. Environmental Protection Agency
Attention: Docket # EPA-HQ-OPP-2009-0628

The Golf Course Superintendents Association of America (GCSAA) submits these comments in response to the Draft Guidance for Pesticide Registrants on Pesticide Drift Labeling (EPA-HQOPP-2009-0628) published in the November 4, 2009 *Federal Register*. GCSAA is a leading golf organization, which has as its focus golf course management. Since 1926, GCSAA has been the top professional association for the men and women who manage golf courses in the United States and worldwide. From its headquarters in Lawrence, Kan., the association provides education, information and representation to more than 20,000 members in 72 countries. GCSAA's mission is to serve its members, advance their profession and enhance the enjoyment, growth and vitality of the game of golf. The association's philanthropic organization, The Environmental Institute for Golf, works to strengthen the compatibility of golf with the natural environment through research grants, support for education programs and outreach efforts.

GCSAA believes that golf facilities will be negatively impacted by the proposed Draft Guidance for Pesticide Registrants on Pesticide Drift Labeling. As a member of the Pesticide Policy Coalition (PPC), whose mission is to ensure the availability of safe, affordable pest management tools, as well as support development and implementation of public policies and laws that utilize the best available science and technology assuring protection of human health and the environment, GCSAA concurs with the comments submitted by PCC on the spray drift Pesticide Registration (PR) notice. GCSAA supports the agency's goal to minimize drift and improve the consistency and clarity of pesticide labeling but opposes EPA's approach to this issue. GCSAA believes that protecting the health of adults and children and the environment is best accomplished through a Federal Insecticide, Fungicide, And Rodenticide Act (FIFRA) approved and enforced label for the pesticide product. The label includes Directions for Use based upon a risk assessment and that incorporates mitigation and application techniques designed to minimize drift.

EPA should maintain and comply with the FIFRA risk-based standard of "no unreasonable adverse effects" and remove the vague, unenforceable, and unmanageable concepts of "could cause adverse effects" or "could cause harm" from the proposed PR notice. Vague language such as "could cause" or "may cause" adverse effects does not belong on a pesticide label because it is not in accordance with FIFRA risk-based standard of "no unreasonable adverse effects" and it forces state regulators into the role of risk assessor to determine what "may or could" cause an effect, which they are not trained to do.

GCSAA is concerned that EPA's proposed guidance on how to enforce the proposed spray drift language sets an unachievable zero drift standard and sets the stage for frivolous lawsuits and enforcement actions against golf course superintendents. In EPA's Draft Pesticide Drift Labeling Interpretation document, the agency says, "Human exposure cases do not have to show contact or adverse effects in order to constitute a violation. Case file evidence showing that humans were directly exposed to a product is sufficient grounds for pursuing a violation. Case file evidence showing that drift could have caused an adverse effect to humans is also sufficient grounds." These statements are of great concern to GCSAA as they are broadly written and open to interpretation as to their meaning. Simply stated, the spray drift guidance as proposed could make it nearly impossible for pesticide use on a significant number of golf courses due to their location in suburban and urban areas. Residential houses are adjacent to many golf courses in the U.S. This could jeopardize a golf course superintendent's ability to make FIFRA approved pesticide applications when the mere action of making a pesticide application could be challenged as a violation as proposed by the agency.

EPA's proposed draft guidance could result in significant negative economic impacts on golf courses in the U.S. GCSAA has over 20,000 members who professionally manage approximately 8,000 golf courses in the U.S. These men and women are educated professionals who are experienced and dedicated to properly managing golf courses. Golf is a sport and a business that maintains marketable standards to meet golfer's expectations while ensuring environmental protection through the wise use of resources. In return, golf provides communities with recreation, social connections and a positive economic benefit. In the United States, golf is more than a leisure time activity – it has a significant impact on the economy. A comprehensive study, *The 2005 Golf Economy Report*, commissioned by the World Golf Foundation's GOLF 20/20 initiative, determined that golf in the U.S. generated \$76 billion in direct economic impact in 2005, up significantly from \$62 billion in 2000. In addition to golf's direct revenues, *The 2005 Golf Economy Report* presented for the first time the direct, indirect, induced and total economic impact of golf on the U.S. economy. The report indicates that golf generated a total economic impact of \$195 billion in 2005, creating approximately 2 million jobs and wage income of \$61 billion. Golf provides significant economic value to the United States and any well intended but misguided guidance on spray drift management will impact this value.

GCSAA members pride themselves in using environmentally sound management practices in order to protect human health and the environment from any potential pesticide spray drift.

(Continued on page 10)

(Continued from page 9)
EPA Memo

Applications on golf courses must be particularly precise to prevent damage to vulnerable areas such as greens or other grasses or ornamentals that are situated adjacent to the targeted area. As previously stated, because private homes often are interwoven into the golf course landscape, preventing spray drift onto the homeowners' property is a priority. Pesticides are tools that help ensure a healthy playing surface for the game that meets the demands of customers (golfers). Pesticides are judiciously applied to limited acres of the golf course. According to the *Property Profile and Environmental Stewardship of Golf Courses – Volume 1* survey results from the GCSAA's Golf Course Environmental Profile, the total acreage of an average 18-hole golf course in the U.S. is 150 acres, of which 100 acres (67 percent) is maintained turfgrass. The 100 acres of maintained turf include approximately 50 acres of rough, 30 acres of fairway, 3 acres of greens, 3 acres of putting greens and 3 acres of tees. Pesticides are not applied to the entire golf course. The highest maintenance areas are the putting greens and tees. Golf course superintendents in the U.S. practice Integrated Pest Management (IPM) and use pesticides judiciously by only applying pesticides when and where they are needed. In addition, golf course superintendents and their staff are trained and licensed to apply pesticides properly. On average, an 18-hole golf facility employs two certified applicators. In order to prevent pesticide spray drift, golf course superintendents' select appropriate nozzle type and size, use the recommended spray volume, adjust boom height, apply pesticides at recommended rates, spray at appropriate wind speeds, and use drift control additives when needed. Weather forecasts are consulted prior to making pesticide applications to minimize risk from spray drift. Also, the technology in application equipment used on golf courses also allows for precise application of pesticides and minimizes the risk of pesticide drift.

In conclusion, GCSAA asks EPA again to maintain and comply with the FIFRA risk-based standard of "no unreasonable adverse effects" and acknowledge that the mere detection of a pesticide off-target does not pose an unreasonable adverse effect and is not a violation of FIFRA that requires an enforcement action. GCSAA concurs with the comments submitted by the PPC and appreciates the opportunity to provide comments on EPA's Draft Guidance for Pesticide Registrants on Pesticide Drift Labeling.

Sincerely,

Clark Throssell, Ph.D., Director of Research, Golf Course Superintendents Association of America

Literature Cited

Lyman, G.T., C.S. Throssell, M.E. Johnson, G.A. Stacey and C.D. Brown. 2007. Golf course profile describes turfgrass, landscape and environmental stewardship features. *Applied Turfgrass Science*. [http://www.plantmanagementnetwork.org/sub/ats/research/2007/profile/SRI International \(2007\)](http://www.plantmanagementnetwork.org/sub/ats/research/2007/profile/SRI International (2007).). The 2005 Golf Economy Report. Menlo Park, CA: SRI International. <http://www.golf2020.com/economicresearch.aspx>.

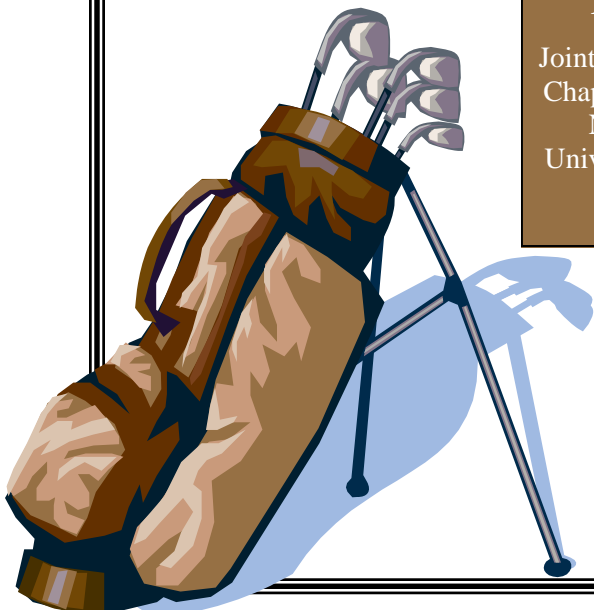
Upcoming Events

May Membership Meeting at Lake Jovita

May 19, 2010

Joint Meeting with the Ridge Chapter. Grady Miller from North Carolina State University will be speaking. RSVP Today!

Registration: 8:00—9:00
Meeting/Speaker: 9:00—Noon
Lunch: Noon—1:00 pm
Shotgun: 1:00 p.m.
RSVP to fwcgcsa@earthlink.net



Mark your calendars for these upcoming events:

June 28—FWCGCSA Chapter Championship at Old Memorial

July 14—FWCGCSA Roundtable discussion at Cypress Run

August 2—20th Annual Pro/Superintendent Challenge