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# 2021-2022 Priority Issues Agenda



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## How the Agenda is developed

The GCSAA Board of Directors, Government Affairs Committee members and staff receive ongoing feedback on golf course management issues through communication with members, affiliated chapters (boards, executives, GCSAA Grassroots Ambassadors), regional turfgrass and green industry coalitions, allied associations, industry partners, university scientists, advocacy consultants, and government agencies. Input and feedback is also gathered from the GCSAA Member Needs Assessment, as well as issue-specific member surveys.

Based on this feedback, the GCSAA Government Affairs Committee biannually develops a recommended Priority Issues Agenda. While staff actively monitor and take action on many issues impacting golf course management, the Priority Issues Agenda outlines the legislative and regulatory “priorities” for GCSAA—those that are likely to require the greatest amount of association resources and staff time.

For each priority issue, the Agenda contains an informational overview, a GCSAA Board-approved position statement, current GCSAA activity on the issue, information on official GCSAA position papers, and information on coalitions in which GCSAA participates.

The recommended Agenda is submitted to the GCSAA Board of Directors for approval. Upon approval, the Agenda is distributed to members through the GCSAA Website and other association communication vehicles.

GCSAA staff utilize the Priority Issues Agenda to take action on golf course management issues. They are guided by the official GCSAA position statement for each issue.

The use of sound science in decision making is important to GCSAA. Throughout the Priority Issues Agenda, the term sound science is referenced frequently. Sound science includes the recognized/accepted science methodologies and practices for research that follow the high standards of the scientific method. These standards include important investigational attributes and practices such as the formulation of a readily testable hypothesis; the use of systematic and well-documented experimental or analytical methods; the application of appropriate data analysis tools (e.g., statistics and mathematical models) to the data; and the articulation of conclusions that address the hypothesis and are supported by the results. Sound science is also reproducible until there are no discrepancies between observations and theory.

## 2021-2022 Priority Issues:

- Americans with Disabilities Act (ADA)
- Fertilizers
- Labor and Immigration
- Pesticides
- Value of Golf
- Water

For more information on any government issues that affect the golf industry, please contact the GCSAA Government Affairs department at (800) 472-7878, or visit GCSAA Online at [www.gcsaa.org](http://www.gcsaa.org).

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**The Americans with Disabilities Act (ADA)**

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**Issue information:**

The Americans with Disabilities Act (ADA) requires reasonable modifications to golf course policies, practices or procedures to serve people with disabilities (as defined by the law) on an equal basis with the rest of the general public. A reasonable modification is one that does not present an undue burden to the golf course or alter the fundamental nature of the game. GCSAA has been active in working with golfers, lawmakers and regulators to address ADA issues since the law's inception. GCSAA and its members have taken a proactive stance on golf course accessibility issues through the use of best practices to accommodate golfers with disabilities; through modification of policies; and through education and outreach to golf course owners and operators. On September 15, 2010, the U.S. Department of Justice (DOJ) released final rules to update its ADA regulations and implement new accessibility standards for golf courses and other recreational facilities. The rules impact municipal and commercial entities and codify the architectural guidelines for barrier removal. The rules impact new golf course development and renovations to existing facilities. Alterations to existing golf courses include the redesign of teeing grounds and greens. Mowing and other general maintenance activities are not considered an alteration. After March 15, 2012, all new golf facilities must be accessible in accordance with the golf course accessibility guidelines and existing courses must remove barriers when it is "readily achievable" over time (easy to accomplish without much difficulty or expense). The golf course accessibility standards cover: accessible routes and/or alternative golf car passages; teeing grounds; putting greens; weather shelters; and driving ranges. Further, on July 26, 2010, DOJ issued an Advanced Notice of Proposed Rulemaking (ANPRM) specific to accessible golf cars. DOJ is considering issuing regulations requiring golf courses that provide golf cars, when replacing or acquiring additional standard golf cars, to provide accessible golf cars for use by individuals with disabilities.

**GCSAA position statement:**

GCSAA recognizes and supports the standards set forth in the Americans with Disabilities Act (ADA) of 1990, as amended, and similar state laws, which are designed to eliminate discrimination against qualified individuals with disabilities. As golf course management professionals, the members of GCSAA will work to make golf accessible to all persons by promoting policies and practices that consider the needs and safety of all golfers, promote the growth and vitality of the game and maintain the agronomic integrity of the golf course. Every golf facility in the U.S. has a stake in growing the game of golf. The growth of the game is dependent upon new golfers of all abilities coming into the game. The purchase of single rider golf cars should be the decision of each individual golf facility weighing multiple factors including customer service considerations, safety of the devices, market demand and economic impact to the facility.

**Coalitions/affiliations:** National Alliance for Accessible Golf (serve on the board of directors)

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## Fertilizers

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### Issue information:

Efforts by states, municipalities and counties across the United States to ban or restrict the use of fertilizers continue as elected officials and citizens attempt to address concerns of nutrient loading in waterways. These efforts are taking place in all areas of the country including the Northeast, Florida, Great Lakes, and Mississippi River Basin. While these efforts encompass all aspects of fertilizer use, primary focus is phosphorus and nitrogen. A federal focus on cleanup of the Chesapeake Bay watershed during the Obama Administration brought greater attention to agricultural and urban nutrient management. The Chesapeake Bay cleanup efforts serve as a “model” for watershed cleanup efforts elsewhere. EPA has pushed state and local governments to regulate fertilizers to control nutrient runoff as well as pushed states to adopt more stringent numeric nutrient water quality standards. As a result, activists are attempting to overturn state preemption laws. Golf course fertilizer use remains a target due to public perception that the amounts used to manage courses are a source of the nutrient loads. State-mandated restrictions and nutrient management plans can have a detrimental impact on golf courses if they are not developed with input from the golf course management industry and without consideration of existing environmental best management practices for golf courses.

Golf course superintendents significantly decreased nutrient use rates and the number of acres being fertilized, according to the *2015 Nutrient Use and Management Practices on U.S. Golf Courses* survey that compared totals from 2006 and 2014. The survey was the second in the latest series of the Golf Course Environmental Profile reports, conducted by the Golf Course Superintendents Association of America (GCSAA) and funded by the United States Golf Association (USGA) through GCSAA’s Environmental Institute for Golf (EIFG). In 2015, conservation practices account for 90 percent of the reduction in nutrient use on U.S. golf courses. U.S. courses have seen an annual reduction in the usage of the three key nutrients found in fertilizer: nitrogen (33.6 percent), phosphate (53.1 percent), and potassium (42 percent) since 2006.

### GCSAA position statement:

Fertilization practices in golf are part of a science based nutrient management scheme that only uses the amount necessary to produce healthy turfgrass and quality playing surfaces. Healthy turfgrass allows communities to enjoy many benefits including: creation of critical "greenspaces"; providing wildlife habitat; and ensuring recreational opportunities. In addition, many entities both public and private rely on healthy greenscapes like golf courses as a key component in maintaining financial revenues. There are also many environmental benefits to healthy turf including the capture of run-off pollutants in stormwater, temperature buffer, erosion control, and serving as a protective barrier for groundwater.

GCSAA supports the development and use of science-based best management practices (BMPs) for fertilizer applications through superintendent–regulator–university partnerships at the local and state levels of government. To support this, the GCSAA launched in 2017 the 50 by 2020 BMP initiative. The goal of this landmark initiative was to have all 50 states with a BMP program in place by 2020 to ensure protection of human health and the environment and demonstrate the industry’s commitment to environmental stewardship. This goal was accomplished at the end of 2020. GCSAA supports golf course superintendents partnering with watershed groups and conservation organizations to develop their state BMP programs.

Fertilizer laws and regulations should be based on sound science supported by credible peer reviewed data and university recommendations. Science-based nutrient management for turfgrass leads to healthy quality turfgrass and thereby leads to more effective and efficient management of other inputs.

GCSAA supports the enactment of state laws preempting regulation of the use of fertilizers and prohibiting local governments from adopting such laws. Local regulation of the use of these products is both costly and unnecessary. Only state designated regulatory agencies should be vested with the authority to regulate the use of nutrients. These agencies have the scientific expertise to properly determine nutrient requirements for each geographic region within a given state. Laws and regulations involving fertilizer applications should recognize golf properties engaged in environmental stewardship practices, and/or programs that address nutrient management through science-based BMP plans.

**Coalitions/affiliations:** Responsible Industry for a Sound Environment (RISE)

## Labor and Immigration

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**Issue information:**

An available, legal and trained workforce is vital to the economic success of golf facilities and a top priority for the golf industry. Bureau of Labor Statistics data demonstrates the demographic reality that the U.S. population is aging, growth in the young workforce is declining, young workers are increasingly educated and disinterested in unskilled labor jobs, and major worker shortages are forecasted especially for seasonal and less-skilled positions. Significant labor shortages will make it difficult for many golf facilities to fill both their permanent and temporary/seasonal labor needs. Additionally, 95% of golf facilities either fall at or under the threshold for small business, as determined by the Small Business Administration (\$15 million in revenue annually). These facilities often face slim profit margins and rely on access to a safe, legal and affordable workforce to operate. Further, many depend on foreign, seasonal labor due to the difficulty in finding U.S. workers willing to take seasonal, unskilled jobs. Proper documentation of workers presents its own set of unique challenges. The U.S. labor shortage, comprehensive immigration reform and mandatory use of E-Verify are issues Congress continues to debate as they try to address the need for a stable, legal workforce to ensure the nation's economic security. Specific labor and immigration issues include:

- H-2B Visa Program

**GCSAA position statement:**

Comprehensive immigration reform includes four pillars of reform: legalization; employment verification systems; temporary worker programs; and border security. GCSAA does not engage in the debate over legalization or border security. Due to the difficulty many golf facilities have in finding permanent and seasonal U.S. workers, GCSAA supports comprehensive immigration reform that includes guest worker provisions. Reform measures should safeguard seasonal worker programs and not place undue economic burdens on employers. Reform should create an immigration system and guest worker program that functions efficiently for employers, workers and government agencies. Reform should create a program that ensures U.S. workers are not displaced by foreign workers and ensures that all workers enjoy the same labor law protections. Reform should strengthen national security by providing for the screening of foreign workers and creating a disincentive for illegal immigration. Enforcement of immigration laws is critical for the economic vitality of the country, national security and for successful comprehensive immigration reform. GCSAA supports reform that creates a fair employment eligibility verification system for new hires that functions efficiently, effectively, and inexpensively for employers, workers and government agencies.

**Coalitions/affiliations:**

Essential Worker Immigration Coalition; ImmigrationWorks USA

**H-2B Visa Program (Sub-Issue)****Issue information:**

The federal H-2B visa program is used by U.S. golf facilities to secure legal employees when they cannot fill seasonal jobs with American workers despite intensive recruitment efforts. The U.S. Department of Labor (DOL) must certify that qualified workers are not available in the U.S. and that the foreign worker's employment will not adversely affect wages and working conditions of similarly employed U.S. workers. The program's congressionally mandated cap of 66,000 (33,000 for each half of the fiscal year) has been consistently inadequate to meet the seasonal needs of small businesses in a strong economy.

According to DOL statistics, in 2006, golf facilities (including resorts) asked for approximately 26,000 H-2B visa workers – of that number over 7,700 were for golf course maintenance positions. The number of H-2B visa workers in the golf industry declined with the country's economic decline. Requests for H-2B visa workers at golf facilities increases as the economy rebuilds and there is more competition for seasonal labor.

The H-2B visa program has been under attack since 2009. DOL has tried to finalize a series of regulations that would significantly increase the hourly wages that must be paid to H-2B workers as well as revamp the program entirely thereby making it difficult if not impossible for small, seasonal employers to use. Congress has held many of these regulations at bay. Further, there are many in Congress and the Administration who wrongly believe the program takes jobs from Americans when instead it fills jobs that would otherwise remain vacant. A continued lobbying effort is necessary to ensure it provides valuable workers for golf.

By filling temporary jobs, H-2B workers not only keep businesses open, they contribute to the creation of year-round jobs for American workers. Studies show that every H-2B position supports 4.6 American jobs.

**GCSAA position statement:**

GCSAA supports bipartisan H-2B cap relief language included in Appropriations bills passed by Congress. The language should exempt H-2B workers from the 66,000 annual cap if they received an H-2B visa during one or more of the previous fiscal years; allocate the 66,000 visas for new H-2B workers on a quarterly basis to assist employers whose season's do not align well with the current biannual allocation; and create a system in which 66,000 H-2B visas for new workers would be allocated on a proportional basis if the cap is reached so that all employers will receive a percentage of H-2B workers.

GCSAA supports long term H-2B relief that will ensure that seasonal employers such as golf will be able to rely on the H-2B visa program to plan for future business growth. This includes raising the H-2B visa annual cap or making the H-2B Returning Worker Exemption permanent. Seasonal employers also need the certainty of a well-run H-2B program to reduce processing delays and ensure access to a safe, legal and reliable temporary workforce. The DOL should streamline and expedite processing of H-2B visa applications. GCSAA also supports the use of private wage surveys to help set the mandatory minimum wages paid to H-2B workers.

**Coalitions/affiliations:**

H-2B Workforce Coalition; Save Small Business Coalition

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## Pesticides

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**Issue information:**

Golf course superintendents utilize pesticides in conjunction with integrated pest management (IPM) practices to best control pests and maintain healthy turf. Best management practices, continuing education, peer-reviewed research and technology are important elements for an IPM approach for golf course superintendents. The latest technology in application equipment is used on golf courses which allows for precise application of pesticides. Pesticide production is highly regulated in the U.S. through the Federal Insecticide, Fungicide and Rodenticide Act which requires that pesticides cause 'no unreasonable adverse effect' to humans or the environment – including water quality and aquatic species. Pesticides used to maintain healthy golf course turf have been thoroughly tested by EPA. As a result, use labels are crafted to protect these resources and must be strictly followed: the "label is the law". The safe and responsible use of pesticides, and the continued availability of effective products, is a top priority for GCSAA and its members. This priority was reinforced in 2000 when GCSAA members passed an addition to the association's bylaws creating new entry and maintenance membership standards for Class A members. As of July 1, 2003, to maintain their membership status, Class A members must obtain a state pesticide applicator license or successfully complete a GCSAA-developed IPM exam which tests on principles of pesticide usage. Specific pesticide sub issues include:

- State Preemption/Pesticide Bans
- Pesticide Regulation
- Endangered Species Act
- Pollinators

Over the past several years, U.S. golf courses have increased their reliance on non-pesticide pest control practices such as cultural control, plant growth regulators and biological control. In addition, there has been a significant downward trend, since 2007, in the degree to which superintendents feel that pesticide restrictions influenced their pest management programs. The 2016 Golf Course Environmental Profile (GCEP) Pest Management Practices Survey showed that reliance on conventional chemistries such as fungicides, herbicides, insecticides and nematicides has either decreased or showed little change. The data suggests that turf managers are using non-pesticide control practices in conjunction with conventional chemistries, rather than as substitutes for them.

**Position statement:**

The responsible use of pesticides is essential to maintaining healthy turfgrass. Healthy turfgrass allows communities to enjoy many benefits including: creation of critical "greenspaces", providing wildlife habitat, and ensuring recreational opportunities. There are many other environment benefits to healthy turfgrass including the capture of run-off pollutants in stormwater, temperature buffer, erosion control, and serving as a protective barrier to groundwater. In addition, many entities both public and private rely on healthy greenspaces like golf courses as a key component in maintaining financial revenues.

Pesticide laws and regulations should be based on sound science supported by credible peer reviewed data and university recommendations. Golf courses employ licensed pesticide applicators that are required to pass state administered exams and complete continuing education each year. These applicators are trained in the safe and proper use of pesticides within an integrated pest management (IPM) system. Golf course superintendents follow best management practices for proper pesticide management on the course. GCSAA launched in 2017 the 50 by 2020 BMP initiative. The goal of this landmark initiative was to have all 50 states with a BMP program in place by 2020 to ensure protection of human health and the environment and demonstrate the industry's commitment to environmental stewardship. This goal was accomplished at the end of 2020.

**Coalitions/affiliations:**

U.S. EPA Pesticide Environmental Stewardship Program (PESP); Responsible Industry for a Sound Environment (RISE); Pesticide Policy Coalition (PPC)

**State Preemption/Pesticide Bans (Sub-Issue)**

**Issue information:**

Many cities and counties across the country are debating ordinances to ban/restrict the use of chemical pesticides on city/public property. This includes parks, city office buildings and government-owned recreation facilities such as golf courses. Local bans/restrictions on pesticide use is a trend that has gained momentum ever since the city of San Francisco, Calif., adopted such an ordinance in 1996. This ordinance has been used as a model by anti-pesticide activists to try to enact similar laws in other locations. Bans on pesticide use by local governments has also been a precursor to efforts to totally ban the use of all pesticides in a community—including applications by private citizens to their homes and lawns, applications to commercial property, privately owned golf courses, sports fields and other recreational facilities.

Many states have preemption (or “state primacy”) laws to prohibit municipalities from adopting local laws and regulations on the use of pesticides and fertilizers. Without such laws, the more than 80,000 municipalities in the U.S. could adopt and enforce their own unique ordinances, including use and applicator certification, making compliance virtually impossible. Local pesticide restrictions hinder the ability of golf course superintendents to control pests that have a detrimental effect on healthy turf.

**GCSAA position statement:**

GCSAA supports the development and use of science based best management practices (BMPs) collaboratively developed through superintendent-regulator-university partnerships at local and state levels of government. Integrated pest management (IPM) practices and plans are an integral part of the golf course BMPs developed by GCSAA for superintendents. GCSAA also supports the enactment of state laws based on sound science preempting regulation of the use of pesticides and prohibiting local governments from adopting such laws.

Local regulation of the use of these products is costly, unnecessary and interferes with professional pest management on the golf course. Local pesticide bans/restrictions hinder the ability of golf course superintendents to control pests that have a detrimental effect on healthy turf, trees and ornamentals. Restricting the use of effective pesticides can curb the ability to control disease carrying pests and can jeopardize public health and sanitation. Local pesticide bans/restrictions also require the use of resources for investigation of violations and enforcement, creating an unnecessary drain on community funds. Pesticides are professionally used in accordance with the label and subsequent to IPM practices. They are integral to successful golf landscapes. Localities lack the resources and expertise to effectively regulate pesticides. EPA and state lead agencies are the only entities with the statutorily mandated expertise and resources to make scientifically informed decisions about pesticide use.

When used properly, pesticides promote healthy turfgrass which provides many environmental benefits including wildlife habitat and a natural water filter.

**Coalitions/affiliations:**

Responsible Industry for a Sound Environment (RISE)  
Pesticide Policy Coalition (PPC)

**Pesticide Regulation (Sub-Issue)****Issue information:**

The 1996 Food Quality Protection Act (FQPA) fundamentally changed the way EPA regulates pesticides. FQPA mandated a single, health-based standard for all pesticides in all foods; provided special protections for infants and children; expedited approval of safer pesticides; and required periodic re-evaluation of pesticide registrations and tolerances to ensure that the scientific data supporting pesticide registrations will remain up-to-date in the future. Under FQPA, EPA was required to reevaluate, within 10 years, all food tolerances that were in place as of August 1996. The agency completed over 99% of the required tolerance reassessments on Aug. 3, 2006. This review resulted in changes to how golf course chemicals are regulated including elimination of certain uses and changes in labeling for others. In August 2006, EPA issued a final rule, which implemented a new Registration Review process. Starting in 2007, every pesticide active ingredient must be reviewed at least once every 15 years. The review of organophosphates began in 2008, and the review of the carbamates class started in 2009.

The Consolidated Appropriations Act of 2004 established a new system for registering pesticides, called the Pesticide Registration Improvement Act, or PRIA. Under PRIA, the pesticide industry pays over \$40 million in pesticide registration and maintenance fees, which supplement federal appropriations, to provide timely resources for EPA's registration and registration review efforts. About 1 of every 4 dollars available to the EPA Office of Pesticide Programs is derived from PRIA fees.

A Sixth Circuit Court of Appeals ruling in January 2009 in the *National Cotton Council vs. U.S. EPA* case overturned the EPA's Aquatic Pesticides Rule from 2006, which held that pesticides applied in accordance with Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) labels are exempt from the Clean Water Act's (CWA) permitting requirements. Effective October 31, 2011, pesticide applications made in, over or near "waters of the U.S." require a CWA National Pollutant Discharge Elimination System (NPDES) permit. Never in the 65 years of FIFRA or 40 years of the CWA has the federal government required a permit for chemical spraying activities for control of such pests as mosquitoes, algae and invasive aquatic weeds. Congress omitted pesticides in 1972 when it enacted the CWA, and despite major rewrites since, has never looked beyond FIFRA for the regulation of pesticides. Unnecessary permitting places a significant economic burden on golf facilities who comprise a large group of small businesses. States spend significant resources in implementing and enforcing a permit that most regulators believe does little if anything to further protect water quality. Citizen action lawsuits can disrupt operations and jeopardize businesses. Future expansion of the permit is of concern.

**GCSAA position statement:**

GCSAA believes that all pesticide uses should be under the legal primacy of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). GCSAA supports the goals of the Food Quality Protection Act (FQPA). GCSAA supports the use of real data and sound scientific methodology to assess pesticides for risk. GCSAA and its members have and will continue to provide accurate and usable data to the regulatory and scientific communities for use in Registration Review implementation decisions. The continued availability of safe, effective and economically viable pesticide products is a top priority for GCSAA and its members.

GCSAA supports a long-term reauthorization by Congress of the Pesticide Registration Improvement Act (PRIA) to create a more predictable and timely pesticide registration and registration review evaluation process of active ingredients used on golf courses. GCSAA supports EPA collecting PRIA fees to register new and innovative pest control products in a timely manner.

GCSAA supports standalone legislation pending in Congress that would remove the NPDES Clean Water Act permit and restore FIFRA supremacy.

**Coalitions/affiliations:**

Responsible Industry for a Sound Environment (RISE)  
Pesticide Policy Coalition (PPC)



**Endangered Species Act (Sub-Issue)****Issue information:**

To meet the conservation and species recovery goals of the Endangered Species Act (ESA), the EPA's Office of Pesticide Programs must consult on each "action" to register or re-register a pesticide use with other federal fish and wildlife agencies like the US Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). EPA is required to make an "effects determination" on whether registration of an active ingredient may harm a threatened or endangered species or its habitat. If there *may* be harm, a formal "consultation process" is initiated between federal agencies and specific steps for consultation are outlined in Section 7 of the ESA.

The ESA Section 7 consultation process has been flawed over time, and the lack of a clear and transparent ESA consultation process has jeopardized the availability and use of effective products to the golf industry. Activist-driven litigation has been coercing the ESA consultation process for pesticides for the past decade. While each court case is different, settlement agreements often require stopping use of targeted active ingredients while EPA re-examines targeted active ingredients on targeted species and habitat. It can take years for the re-evaluation to occur. Further complicating matters, while EPA uses a risk-benefit analysis to evaluate the registration and use of active ingredients, the fish and wildlife agencies examine pesticide use from a hazard only lens. The intersection of FIFRA and ESA continues to present a significant challenge for the registration of pesticides.

During the past 35+ years, EPA has not successfully implemented ESA consultation process obligations as part of pesticide registration activities. However, it has been EPA's intention to integrate ESA consultation process obligations into its Registration Review process.

In 2011, EPA, US Department of Agriculture (USDA), USFWS and NMFS asked the National Academy of Sciences (NAS) to evaluate the ESA consultation review process and help the federal agencies come up with a better consultation process. In November 2013, the NAS released a much-anticipated report stating that EPA, NMFS, and USFWS should use a common approach when determining the potential effects a pesticide has on an endangered species and its environment. In 2014, the EPA began holding workshops to provide a forum for stakeholders to offer scientific and technical feedback on the joint interim approaches recommended by the NAS. Work continues between the federal agencies on crafting an effective and efficient ESA consultation process.

**GCSAA position statement:**

GCSAA shares in EPA's commitment to ensure that actions carried out by it and other federal agencies should not harm endangered species or threatened species or result in the destruction or adverse modification of their critical habitat. However, protecting endangered species and habitat do not need to be contradictory with easing the regulatory burdens faced by industry. GCSAA and its members have long-standing support, involvement and implementation of environmental stewardship programs that protect wildlife species and habitat throughout the U.S. GCSAA supports EPA and USDA working with federal fish and wildlife agencies to promulgate new rules that establish clear and equitable procedures for notice and comment on the EPA's pesticide effects determinations for endangered species and subsequent actions including draft Biological Opinions and potential product restrictions. The new consultation process should be responsible, streamlined and sustainable to mitigate against ongoing ESA Section 7 litigation.

GCSAA supports implementation of the Trump Administration's January 31, 2018 Memorandum of Agreement between EPA-Interior-Commerce which establishes an interagency Working Group to evaluate and improve the Endangered Species Act consultation process for pesticide registration.

**Coalitions/affiliations:**

Responsible Industry for a Sound Environment (RISE)  
Pesticide Policy Coalition (PPC)

**Pollinators (Sub-Issue)****Issue information:**

GCSAA recognizes the importance of native pollinators in our ecosystem and their significant contribution to our quality of life. GCSAA is aware of and concerned about the issue of pollinator decline. Researchers are working to determine exact causes of decline and the association supports expedited review of the many potential factors that contribute to pollinator issues. GCSAA will continue to support use of best management practices that provide habitat through native areas as well as the professional use of inputs through training and education and the use of IPM practices. There are golf facilities providing apiaries that provide a great education platform to create awareness of pollinator issues Americans face.

In 2015, the White House Pollinator Health Task Force published its report, *National Strategy to Promote the Health of Honey Bees and other Pollinators*. EPA's portion of the strategy reviewed its current and planned actions on pollinators, including its plan for pollinator risk assessments, new testing guidelines and mitigation through state pollinator plans. EPA issued a proposed rule to adopt mandatory pesticide label restrictions to protect managed bees under contract service. EPA also issued a proposed rule regarding *Risk Management Approach to Identifying Options for Protecting the Monarch Butterfly*. There has been a steady increase in the number of "pollinator free" cities across the country and big box retail stores have been phasing out the use of neonicotinoids.

In 2020, GCSAA added a comprehensive pollinator resources section to [gcsaa.org](http://gcsaa.org). This section provides a comprehensive listing of the association's work toward pollinator protection including articles, webinars, case studies, videos, pollinator habitat and conversation guides, and information on beekeeping and apiaries. The pollinator resources section includes information on environmental stewardship programs like Audubon International and Monarchs in the Rough many golf course superintendents participate in. GCSAA has also made pollinator protection a key focus area within its national Best Management Practices Planning Guide and Template. At the end of 2020 all 50 states had a comprehensive agronomic and environmental Best Management Practices program in place which included pollinator protection.

**GCSAA position statement:**

Golf course superintendents need to conduct pest control activities and those should be done in accordance with comprehensive IPM strategies while also complying with labeling laws set forth by FIFRA and EPA rulemakings. GCSAA will continue to monitor and engage in regulatory activities that directly impact active ingredients used on golf courses. GCSAA will monitor indirect activities but will engage only if impacts to golf courses are imminent.

Golf facilities contribute valuable green space within any watershed and community. Within the golf course, natural and/or native areas provide opportunities to provide habitat for wild pollinators and honey bees. Golf course superintendents should continue to develop, protect and manage areas for wildlife and pollinator habitat. One key guide is the resource provided by the USGA and Xerces Society, "Making Room for Native Pollinators." Honey bees will benefit from these efforts as well.

**Coalitions/affiliations:**

Responsible Industry for a Sound Environment (RISE)  
Pesticide Policy Coalition (PPC)

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## Value of Golf

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**Issue information:**

Golf is a sport played by more than 24 million Americans and enjoyed as a favorite spectator activity by millions more. But it is far more than a game: golf is a leading U.S. industry that makes a wide variety of positive contributions to society. 76 percent of golf facilities are open to the public. Approximately 8 of 10 golfers play on public courses.

Turfgrass comprises 60+ million acres; 4th largest crop in the U.S. Turf is horticulture's most omnipresent crop worldwide. The 2 million acres on our nation's golf courses provide golfers with playing conditions that promote health and well-being while serving as important green spaces in communities.

GCSAA's First Green program is an innovative environmental and STEM (Science, Technology, Engineering and Math) education outreach program using golf courses as environmental learning labs. Golf Course Superintendents and/or local golf course representatives host students on field trips where they test water quality, collect soil samples, identify plants, design plantings, assist in stream bed restoration and are involved in the ecology and environmental aspects of the golf course.

In 2016, the golf industry released new health and wellness data. A regular game of golf is likely to increase life expectancy and lead to better physical health, according to University of Edinburgh researchers. The review of 5,000 studies on golf and wellbeing found physical benefits increased with the player's age. The study is part of the Gold and Health Project, which is led by the World Golf Foundation. Walking 18 holes is equal to a 5-mile walk or 3.5-to-4-mile run. Playing golf and walking 18 holes can burn up to 2,000 calories. Golfers exceed 10,000 steps in a typical round of golf, meeting the recommended guidelines for daily exercise.

Most golf facilities in the U.S. qualify as small businesses according to the Small Business Administration. The golf facility size standard to be qualified as a small business is \$15 million in average annual receipts. Unfortunately, golf has been excluded from receiving benefits from several prominent pieces of federal legislation including relief for the victims of Hurricanes Katrina and Rita, relief to victims of natural disasters across the country in 2008 and 2009, and in 2009 with the federal economic stimulus bill. Continued exclusion of the golf industry – a major generator of jobs and tax revenue across the country – from relief and stimulus measures being considered by Congress is a serious challenge facing the industry.

Collectively golf is big business, but as an industry comprised mostly of small businesses, its longevity and sustainability are sensitive like other industries to the uncertainty of economic conditions and impacts of unnecessary regulation. Many individual golf facilities often operate on small profit margins. Specific value of golf sub issues include:

- COVID/pandemic relief

**GCSAA position statement:**

Golf is more than a game – the 2016 U.S. Golf Economy Report quantified golf's annual direct economic impact as \$84.1 billion, the industry provides nearly 2 million jobs and \$58.7 billion in wage income. In total, the U.S. golf economy exceeds \$191.9 billion in direct, indirect and induced impacts. The golf industry produced \$25.7 billion in travel expenditures in 2016. Golf's core industries exceed the charitable impact of the Major League Baseball, National Football League, National Basketball Association and National Hockey League combined. As a significant contributor to the U.S. economy, the continued health and growth of the golf industry has a direct bearing on jobs, economic development and tax revenues for thousands of communities across the country.

Golf facilities are good for the communities they serve. Golf contributes to society by providing economic, human, health/wellness and environmental benefits. Golf facilities are professionally managed by individuals who have achieved various levels of certification, they serve as managed open green space providing habitat for wildlife, and they generate \$3.9 billion for charity each year. Golf as a fundraising vehicle includes an estimated 12,700 golf facilities, 143,000 events, 12 million participants and raises

\$26,300 average per function. Golf courses are a valuable use of land and can provide solutions to problems resulting from land degradation and urban development, including stormwater management, wetland mitigation and brownfield redevelopment.

GCSAA supports partnerships and collaboration with federal and state commerce departments and federal, state and local chamber of commerce organizations to advance the growth of the game of golf. Golf should be included in federal catastrophic relief targeted at businesses following natural disasters. Golf should have access to federal incentives and funding that stimulates the golf industry. Local and state golf associations should continue to invest in economic impact reports as a means to educate local, state and federal policymakers on the values of the golf industry.

GCSAA and the National Turfgrass Federation need support to promote turfgrass research and its many benefits, aided by academia, competitive government grants, and private industry. Turfgrass should be recognized as an important specialty crop by the USDA and Congress. GCSAA urges Congress to prioritize future turfgrass research funds via the Farm Bill and annual Agriculture Appropriations legislation. Farm Bill funding will support research that encourages discovery of solutions in areas ranging from drought and water conservation to soil erosion mitigation and enhancing commercial, recreational and residential spaces.

**Coalitions/affiliations:**

We Are Golf

**COVID/pandemic relief (Sub-Issue)****Issue information:**

Coronavirus disease 2019 (COVID-19) is a contagious respiratory disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). First identified in Wuhan, China in 2019, it has led to a very serious global health crisis that ramped up in the United States beginning in March 2020. COVID-19 quickly spread throughout the United States between March-May 2020, resulting in local and state governments issuing severe business restrictions and stay-at-home orders. Consequently, all factions of the golf industry quickly assembled to: 1) ensure golfing was included as an acceptable form of outdoor recreation; and 2) ensure minimal maintenance at golf properties could continue. Proactive advocacy efforts included outreach to governor's offices in all 50 states by golf industry leaders and state-based golf coalitions.

The golf industry, working in alignment with the Centers for Disease Control, developed Back2Golf guidelines which were modeled after President Trump's *Guidelines for Opening Up America Again*. These guidelines demonstrate that golf can offer an outdoor recreational experience that provides many health and wellness benefits. This comprehensive plan allows golf to be played responsibly while observing recommended social distancing guidelines.

With Americans seeking opportunities to safely recreate outdoors, golf rounds were at record highs throughout 2020 in many parts of the country resulting in an increased awareness and appreciation for the numerous benefits golf courses bring to communities. However, while golf rounds have increased, many golf facilities and clubs have been significantly impacted by government-mandated restrictions on operations and outright closures. Like many small businesses in the service industry, the service side of golf has suffered tremendous losses with event, tournament and wedding cancellations, and reduced restaurant operations. In a Club Management Association of America (CMAA) survey released on July 1, 2020, 90 percent of clubs and golf facilities responding said they had experienced a financial loss in 2020. The average loss experienced exceeded \$600,000 per club in the first six months of the year.

**GCSAA position statement:**

The game of golf remains a crucial outlet for the public during a global health pandemic. As Congress considers coronavirus relief for small businesses in response to COVID-19, GCSAA supports specific priorities in its continued response to the coronavirus pandemic and stimulus for the economy. These specific priorities include:

- **Paycheck Protection Program:** GCSAA urges Congress to allow 501(c)(7) membership clubs to be eligible to provide their workers with the same protections as other businesses. Many clubs and golf facilities are 501(c)(7) nonprofit entities and thus, have been ineligible for the PPP. These clubs employ hundreds of thousands of workers, including kitchen staff, servers, bartenders, and others who are disproportionately impacted by government-mandated closures of food and beverage operations. These employees should not be excluded from pandemic relief simply due to their employer's IRS classification.
- **Employee Retention Tax Credit:** The ERTC was authorized as part of the CARES Act. This program allows employers to claim a credit against payroll taxes for up to 50 percent of the first \$10,000 of eligible workers wages. GCSAA supports legislation that would increase the amount of wages eligible for the tax credit from 50 to 80 percent.
- **State and Local Aid:** The federal government should provide adequate aid to state and local governments to help address budget shortfalls. Without these resources, local governments could be forced to enact sales and property tax hikes that would slow our nation's recovery.

Golf facilities across the U.S. have been proactive and creative in implementing new protocols based on CDC guidelines and recommendations related to distancing and sanitation. Where allowed, golf has proven to be a reliable refuge for those seeking fresh air and recreation in a socially distant manner. As government bodies carefully consider the steps needed to maintain state economies, GCSAA urges government bodies to remember the many community benefits offered by golf courses, the opportunity golf facilities provide to the millions who enjoy the game, and the many new social distancing protocols put in place. GCSAA and the golf industry wants to serve as a reliable partner at all levels of government to respond to COVID-19 and any future pandemics.

A golf course is a living ecosystem requiring active management. Golf course superintendents cannot simply or quickly bring a course back to regular playing conditions after a period of total neglect. Even if a course must close for play, a minimum maintenance regimen must be ensured to maintain turf health until that facility may resume normal operations. Continued minimal golf course maintenance should be deemed essential and critical throughout a pandemic and government entities should endorse the Minimum Maintenance for Golf Courses During COVID-19 Outbreak developed by the GCSAA and United States Golf Association.

**Coalitions/affiliations:**

We Are Golf

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## Water

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**Issue Information:**

Water availability, water quality, water rights, water use and water costs are significant issues for golf courses at all levels of government. Some areas of the U.S. require golf courses to use reclaimed, effluent or other nonpotable water sources for irrigation and it is important that there is access to water suitable for use on turfgrass. Many golf course superintendents monitor water quality of streams and groundwater. Golf courses can also have a significant impact on groundwater recharge, especially in suburban areas. Proper management and conservation of water resources is an important issue for golf course management.

Efficient water use and water quality management on golf courses requires up-to-date technologies, continuing education, scientific research, and sound management practices by golf course superintendents. Innovations at golf facilities include the use of soil sensors, reclaimed water, sophisticated weather instruments such as weather stations, weather sensors, wetting agents, irrigation controls, VFD pump controls, drought- and salt-resistant grasses, water conservation and water protection practices. Golf facilities are making significant capital investments in these water conservation technologies in order to demonstrate their commitment to environmental stewardship. Specific water issues include:

- Water Quality - surface and groundwater protection, nutrient loading, non-point source pollution, reclaimed water
- Water Quantity - effluent/reclaimed water, drought, conservation of water resources

**GCSAA position statement:**

Golf course superintendents are responsible stewards of water resources. GCSAA supports collaboration with all levels of government to address water use and quality issues and for golf course superintendents to be involved in the construction of productive public policy related to water issues. GCSAA supports water conservation and 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.

GCSAA supports the development and use of science-based best management practices (BMPs) for water conservation and water quality through superintendent–regulator–university partnerships at the local and state levels of government. To support this, the GCSAA launched in 2017 the 50 by 2020 BMP initiative. The goal of this landmark initiative was to have all 50 states with a BMP program in place by 2020 to ensure protection of human health and the environment and demonstrate the industry’s commitment to environmental stewardship. This goal was accomplished at the end of 2020.

Public policy can help accelerate the adoption and implementation of water management on golf properties through incentives, including cost sharing, regulatory relief, tax credits, rebates and technical assistance. GCSAA supports the development and promotion of environmentally responsible economic and regulatory incentives for: installation of efficient irrigation products and systems; retrofits of existing irrigation systems with water-efficient technologies; and design and maintenance practices that foster and support efficient irrigation.

**Coalitions/affiliations:**

U.S. EPA Pesticide Environmental Stewardship Program; Irrigation Association; WasteReuse Association Waters Advocacy Coalition; U.S. Water Alliance; National Groundwater Association

**Water Quality (Sub-Issue)****Issue Information:**

Water quality is a critical issue for golf facilities for both surface water and groundwater. Golf courses serve as important water treatment systems. Healthy turfgrass is a filter that traps and holds pollutants in place; golf courses serve as catch basins for residential and industrial runoff; many courses are effective disposal sites for effluent wastewater and have agreements with local municipalities for this purpose. Modern turfgrass management practices greatly reduce the potential for leaching or runoff into water supplies. Independent university research supports the fact that well-managed golf courses do not pose significant risks to environmental quality, wildlife or human health.

Some areas of the U.S. require golf courses to use reclaimed, effluent or other nonpotable water sources for irrigation and it is important there is access to water suitable for use on turfgrass. Many golf course superintendents monitor water quality of streams and groundwater. Golf courses can also have a significant impact on groundwater recharge, especially in suburban areas. The turfgrass system acts as a living filter for reclaimed wastewater as measured by the leachate that percolates below the rootzone. This leachate helps with the recharging of aquifers.

In April 2014, the U.S. EPA and the Army Corps of Engineers under the Obama Administration issued a proposed rule that would redefine “waters of the United States” (WOTUS) under all Clean Water Act (CWA) programs. The proposed regulation would have broadened the scope of CWA jurisdiction beyond constitutional and statutory limits established by Congress and recognized by the Supreme Court. Since the 2015 Clean Water Rule was first proposed by EPA and the Corps, GCSAA repeatedly argued that its sweeping scope over rivers, streams, wetlands and ditches would result in an expensive, unpredictable and unnecessary permitting process for golf courses across the country. GCSAA worked with the Waters Advocacy Coalition to oppose the rule; the rule was officially struck down by the court system.

GCSAA worked with those in the Trump Administration to repeal and replace the Obama Administration’s Clean Water Rule. On April 21, 2020, the EPA and Army Corps of Engineers published the final Navigable Waters Protection Rule in the *Federal Register* to provide a revised definition of “Waters of the United States” under the Clean Water Act. GCSAA supported efforts by EPA and the Corps and within Congress to repeal WOTUS and replace it with a rule that protected water while providing clarity to golf course superintendents regarding the inputs they use at their facilities.

**GCSAA position statement:**

GCSAA supports water quality protection laws and regulations that are based on sound science and credible data and promote the benefits of turfgrass and professionally managed landscapes. GCSAA supports the use of reclaimed, effluent or other non-potable water for golf course irrigation when the water quality is suitable for plant growth and there are no public health implications. GCSAA does not support mandated use of reclaimed water when the water quality or water quantity is not adequate, when use is not cost effective or when the golf course superintendent does not play a key role in the decision-making process for the development of effluent water standards.

Properly maintained turfgrass provides many community benefits including: critical "greenspaces"; habitat for birds and other wildlife; temperature buffer, recreational opportunities; capture of run-off pollutants in stormwater, and carbon sequestration and oxygen production. In addition, many entities both public and private rely on healthy greenscapes such as golf courses as a key component in maintaining financial revenues.

GCSAA does not support Congress, EPA or the Army Corps of Engineers expanding the jurisdictional reach of the federal Clean Water Act. This would be 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. Increased delays in securing permits will raise costs of and impede many economic activities. GCSAA supported efforts by the Trump Administration to enact the NWPR to protect the principles of cooperative federalism in the Clean Water Act and recognize the role that golf course superintendents play as responsible stewards of water resources.

**Coalitions/affiliations:**

EPA Pesticide Environmental Stewardship Program; WasteReuse Association; Waters Advocacy Coalition



**Water Quantity (Sub-Issue)****Issue Information:**

Among the most important issues facing the future of the game of golf is that of water use. Golf courses rely on water to irrigate the landscape on which the game is played. Often, golf courses are highly visible features in communities and are targets for criticism during periods of drought when homeowners and others are restricted in their use of potable water.

The Golf Course Environmental Profile (GCEP) Water Use and Conservation Survey showed that golf facilities nationally account for one-half of one percent of all water withdrawn annually and just one and one-half percent of all irrigated water applied. In 2014, U.S. golf course superintendents were using 21.8 percent less water on average and just 1.44 percent of all irrigated water in the U.S. to maintain their courses. The 2014 Water Use and Conservation Practices on U.S. Golf Courses survey results, phase 2 of the GCEP, were from more than 1,900 golf course superintendents. The study shows us that the golf industry has been addressing water issues for an extended period of time and is realizing positive results.

Golf facilities must proactively conserve water. Conserving water on golf facilities is essential to becoming a sustainable business. Optimizing the acreage of irrigated turfgrass, implementing best management practices, utilizing technology to make water application decisions, conducting an irrigation system audit along with an audit of the non-golf course water uses at the entire facility are key to becoming responsible users of water. The golf industry takes steps to responsibly use water and reduce the reliance on potable water.

- Superintendents utilize information from multiple sources as part of their decision to apply water. Most facilities utilize direct observations of turfgrass and soil conditions. They also utilize weather and evapotranspiration data (2014: 17.9% of golf courses overall).
- Utilizing improved grasses that rely on less water.
- New irrigation system technologies.
- Irrigation best management practices.
- Alternate water sources.

**GCSAA position statement:**

GCSAA supports water conservation and the utilization of irrigation/water use best management practices (BMPs). GCSAA supports golf facilities utilizing irrigation system audits as a means to increase the effectiveness of the irrigation system and conserve water. GCSAA supports active collaboration with state and local officials to enact appropriate drought restrictions. GCSAA supports the creation and use of written drought management plans by golf facilities that are subject to drought cycles.

Regulatory agencies and golf courses should work together to develop conservation plans and BMPs. Regulations need to be based on sound science. Regulatory agencies need to look at golf courses as small businesses and important members of the community.

Properly maintained turfgrass provides many community benefits including: critical "greenspaces"; habitat for birds and other wildlife; recreational opportunities; temperature buffer; capture of run-off pollutants in stormwater; and carbon sequestration and oxygen production. In addition, many entities both public and private rely on healthy turfgrass as a key component in maintaining financial revenues.

Golf facilities should continue to take advantage of technology as part of the irrigation decision-making process to conserve water. The utilization of data from soil sensors for irrigation scheduling decisions is likely to increase in the future as the equipment becomes more reliable and affordable. GCSAA supports the development and promotion of environmentally responsible economic and regulatory incentives for water conservation: installation of efficient irrigation products and systems; retrofits of existing irrigation systems with water-efficient technologies; and design and maintenance practices that foster and support efficient irrigation.

**Coalitions/affiliations:**

U.S. EPA Pesticide Environmental Stewardship Program; Irrigation Association; U.S. Water Alliance; National Groundwater Association