

Advice on Dealing With
Governmental Agencies

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The paper on ground water contamination presented earlier in this conference is an example of science. When that type of information becomes used in a public forum for decision making we enter the realm of science policy and politics. Recent experiences with public debates on turf chemical risks in four states -- Michigan, Vermont, Hawaii and Massachusetts (Cape Cod) -- have been eye opening. In spite of the thorough, objective development of a state-of-the-art golf course management plan, a state-of-the-art ground/surface water risk assessment, a comprehensive wetland mitigation plan, and MDNR approval, EPA continues to employ bizarre politics to delay a golf course project near Glen Arbor, Michigan. In Vermont, concerns about a proposed golf course in Sherman Hollow led the State, in consultation with a citizens' advisory group, to develop a state-wide comprehensive permitting program for turf chemicals used on golf courses. In Hawaii, blackmail is being used to extract \$20-\$100 million "impact fees" from golf course developers. In exchange, the Mayor and the Department of General Planning will drop their environmental objections. On Cape Cod, a well-designed monitoring study and open, sincere discussions with citizenry about turf chemical risks have led to a good balance between golf course development and preservation of ground water quality.

These experiences, coupled with experiences gleaned from 11 years with EPA, lead to the following advice.

- If the official you are dealing with appears young and inexperienced, try to put him or her at ease. Don't indicate, unless absolutely necessary, that you intend to use humiliation or strong-arm tactics.
- Go to the meeting with all of your bases covered. Anticipate in advance any environmental requirements or assessments that might be requested by the regulator(s). Then come to the meeting(s) with the task completed or an action plan developed.
- Learn the basic principles behind key scientific assessments and regulatory statutes. Establish a network of university, extension, and consultant experts to fill in the details and provide the expertise.
- At the earliest opportunity, try to learn about your regulatory contact's background and biases. Do this through the network of experts described above.

- Accept the various environmental regulations and implement them. Don't blame the lower-level staffer for laws and regulations he or she probably did not write.
- In the area of science, take the high road. Be objective. Don't take an extremist viewpoint. Although most turf chemicals can be used in most environments without contaminating surface water or ground water, preliminary risk screening of pesticide mobility, persistence, and toxicity is often indicated.
- In the area of politics, don't always feel obligated to take the high road. In this author's experience, politics are usually more important and more sleazy at the local level than at the federal level. Do good science, but don't be politically naive.