



## Informal Comments on the Draft 5MP Turf Section

1 message

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To: "managementplans@azwater.gov" <managementplans@azwater.gov>

Hello,

My name is Bri Kenny and I am a representative of Troon Golf, LLC which manages about 40 golf courses within the AMA's across Arizona. After reviewing the current draft of the 5<sup>th</sup> Management Plan there are some comments I would like to make. I still have some underlying disagreements with the structure of the plan stemming from previous versions and the way reductions are calculated. However, I do support this most current version of the 5MP over previous versions. Although this management plan will be challenging for our (Troon Golf) courses, I believe this current draft is more realistic for the majority of the industry given the very short timeline between the 4MP and the 5MP.

There are some more specific comments I have on the current version:

1. I noticed changes in the decimal places used for the turfgrass overseeded consumptive use rate. The recommendations Dr. Brown made for the turfgrass rate (both overseeded and non-overseeded) and the Low Water Use Landscape rate were all given to two decimal places and I recommend adhering to the same format to provide consistency with the rates.
2. In the last Turf Breakout meeting on August 17, 2021 there were some comments made about providing an extra LWUL allotment to courses removing turf acreage. I support those comments and would like to have an additional allotment included for those courses. I know some properties will be removing a significant amount of turf and will need more than the current allotment provides to sustain their new low-water use landscaping.
3. I support the effluent adjustment remaining as is until a deeper investigation is possible (which this shortened timeline did not allow for). Effluent water quality varies significantly across and within AMA's. We need information that is more robust before we make any changes to this credit.
4. I appreciate the grant made available for the larger acreage and older golf courses. The 5MP will certainly be a challenge for our golf courses that are in that category, but the grant will offer some assistance. I do think the amount of the grant is too low and would like to see either the rate or the limit raised to assist the courses needing to consider greater turf reductions. However, I nonetheless appreciate that a grant was established as a tool.

Thank you for the opportunity to submit comments on this draft version of the 5<sup>th</sup> Management Plan.

**Bri Kenny | Manager, Environmental Science**

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