

Good morning,

My name is Matt Gourlay and I am the Director of Golf Course Operations at Colbert Hills golf course in Manhattan, KS. I am a third-generation golf course superintendent and the second member of my family to oversee operations at Colbert Hills.

Superintendents like myself are committed to environmental stewardship. We use science-based agronomic and environmental best management practices to keep water bodies clean. Thanks to the implementation of some of these practices at my course, I was recently awarded the GCSAA's 2018 Environmental Leader in Golf award.

Of the 150 acres on an average golf course, 11 acres are comprised of streams, ponds, lakes, and/or wetlands. Additionally, golf course landscapes are designed to manage surface water runoff from neighboring properties such as residential and commercial areas. Irrigation for the golf course often comes from these surface waters. These waters sometimes enter our properties in a degraded state, but thanks to sediment filtration provided for by healthy turfgrass and native grasses as well as modern irrigation and storage practices, water quality testing consistently shows these waters to be cleaner exiting our golf courses than entering.

We are proud of our stewardship efforts. However, to continue these proactive conservation practices, we must also have clear rules. 94% of golf facilities are classified as small businesses and many operate on slim margins. Golf faces the same legal requirements – and burdens – under the Clean Water Act, as other industries for its activities on, over, or near “Waters of the United States”. Basic projects vital to golf course operations – such as planting trees, installing drainage, and fixing stream alignments – can trigger the hiring of environmental scientists, ecologists, and engineers to do environmental assessments, assist with permitting, and help with mitigation efforts. In other words, the financial impact of these actions can be very substantial.

That's why it is so important to clarify jurisdictional waters while respecting the balance of cooperative federalism under the CWA. The lack of clarity in the 2015 WOTUS rule would have significantly harmed golf courses trying to do the right thing. We appreciate the EPA and the Army Corps of Engineers working on a better rule and will provide additional comment in writing to the docket.

In closing, proactive management of these resources helps to minimize excessive federal regulation while supporting state and local efforts. By properly managing water on our properties, the golf industry will continue to provide environmental, economic, health, and social benefits to our communities and watersheds.

Thank you.