



The Honorable James Inhofe (R-OK)
Senate Environment and Public Works Committee
406 Dirksen Senate Office Building
Washington, D.C. 20510

June 12, 2019

Dear Senator Inhofe:

On behalf of the Oklahoma Golf Course Superintendents Association, please accept this letter to the Senate Environment and Public Works Committee as it reviews the ongoing efforts to rewrite the 2015 Clean Water Rule, more commonly known as the “Waters of the United States Rule” or “WOTUS”.

Oklahoma GCSA, an affiliated chapter of the Golf Course Superintendents Association of America, supports the efforts to replace WOTUS with a rule that better defines those waters subject to federal jurisdiction under the Clean Water Act. WOTUS so poorly defines such water features as tributaries and wetlands that, if left unchanged, it would result in an expensive, unpredictable, and unnecessary permitting process for golf courses in Oklahoma as well across the country. Golf supports a rule that protects the principles of cooperative federalism with the Clean Water Act, while recognizing the role that responsible parties, including golf course superintendents, play as land managers and environmental stewards.

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. These waters sometimes enter our properties in a degraded state, but thanks to sediment filtration provided by healthy turfgrass and native grasses as well as the science-based agronomic and environmental best management practices our superintendents utilize, water quality testing consistently shows these waters to be cleaner exiting our 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. However, 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 Clean Water Act. The lack of clarity in WOTUS would have

significantly harmed golf courses trying to do the right thing. We appreciate the efforts in the Administration and Congress to produce a better rule.

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 charitable benefits to our communities and watersheds.

Sincerely,

Larry Taylor
Board President of the OKGCSA