

The Honorable Shelley Moore Capito (R-WV)
Senate Environment and Public Works Committee
172 Russell Senate Office Building
Washington, D.C. 20510



June 12, 2019

Dear Senator Capito:

On behalf of the West Virginia 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.”

West Virginia GCSA, a 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 unchanged, would result in an expensive, unpredictable, and unnecessary permitting process for golf courses in West Virginia and 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 residential and commercial properties. These waters often enter our properties in a degraded state. However, water quality testing consistently shows these waters to be cleaner when exiting the golf courses. This is due to sediment filtration provided by healthy turfgrass and the science-based agronomic and environmental best management practices that our superintendents utilize.

We are proud of our stewardship efforts. To continue these proactive conservation practices, we must 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 for environmental assessments, permitting, and mitigation efforts. In other words, the financial impact of these actions can be substantial.

That is 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 while efficiently managing our business. 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,

Anthony Coppa, President
West Virginia GCSA

Nicholas Janovich, Golf Course Superintendent
Oglebay Resort, Wheeling, WV