

Connecticut Association of Golf Course Superintendents

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Testimony of
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Department of Environmental Protection: Proposed Stream Flow Standards and Regulations Public Noticed in the Connecticut Law Journal on October 13, 2009

Good morning my name is John Garcia, I'm the President of the Connecticut Association of Golf Course Superintendents. CAGCS represents superintendents at the nearly 200 golf courses throughout the state. On behalf of the golf course industry, we are concerned about the negative fiscal impact that the proposed regulations will have on struggling golf courses throughout the state. Many of our member clubs have been pushed to the brink of bankruptcy during the recent economic downturn and the increase in cost associated with this proposal will potentially cause golf courses to fail.

The existing registration and permit process has cost our member clubs between \$50,000 and \$650,000 each in consulting, legal, infrastructure and permit fees. For many golf clubs in the state, the proposed regulation will create an additional financial burden that they will not be able to sustain. If golf courses close the land will likely be utilized by housing developments and industrial use which would likely have a greater negative impact on water quality (septic systems) and usage, in addition to stressing municipal services throughout the state.

Golf courses serve as open green space providing natural habitat to wildlife, helping to absorb and filter rain water, improve community aesthetics, and improve the physical and mental health of some 350,000 golfers state-wide. In addition they provide nearly 10,000 jobs and \$400 million in net revenue to the state.

As an organization, golf course superintendents are proud stewards and respect the environment. We are a self-policing industry when it comes to water usage. Because our delivery systems are expensive to operate and maintain, and wet conditions promote decline in turf quality and playability for our customers, we take great care in the amount of water we use. It is in every golf course's best interest to conserve water and we have worked closely with the DEP to develop the "Best Management Practices for Golf Course Water Use."

Additionally, as was reported at the DEP's December 21st Informational Hearing, our irrigation practices account for less than 1-percent by volume, of the registered and/or permitted water diversion in the state. It has also been reported that less than .4-percent of the State's water bodies are considered "at risk". Based on these facts, CAGCS would respectfully ask that DEP classify first, and narrow the proposed regulations to focus on the .4-percent of water bodies that are at risk rather than attempt to apply a broad standard to bodies of water that aren't in any danger.

Specifically, CAGCS would ask that DEP exempt golf courses from this proposed regulation because through new technologies and best management practices, golf course are already achieving the results the department is seeking in this regulation.

Following the conclusion of the comment period, CAGCS would appreciate the opportunity to meet with the department to discuss the details of an exemption.

We will provide additional written testimony prior to the February 4th deadline.
Thank you for the time and the opportunity to speak today.