



# Connecticut Association of Golf Course Superintendents, Inc.

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## Position Paper

### Opposing DEP's— Stream Flow Standards Regulation

#### **Background**

In 2005 Waterbury reached a settlement agreement to reduce the amount of water they were drawing from the Shepaug River following lawsuits filed by various environmental groups claiming the city was overusing the river. That same year the Fenton River was pumped dry by the University of Connecticut to supply water to their Storrs campus.

As a result of these two situations, the Connecticut General Assembly passed legislation requiring DEP to adopt mandatory stream flow regulations. The legislation requires that, "such flow regulations shall preserve and protect the natural aquatic life while providing for the needs and requirements of public health, flood control, industry, public utilities, water supply, public safety, agriculture and other lawful uses of such waters."

#### **Process**

At the end of last year DEP published their draft Stream Flow Regulations, holding several information and public hearings. CAGCS along with the CSGA and several of their members presented or submitted testimony outlining the superintendents concerns with the regulation. In addition, CAGCS and CSGA met with DEP Commissioner Amey Marrella and her staff where they explained the details of their proposal and CAGCS representatives express their concerns personally to the commissioner. The final step in the regulatory process is a vote by the Regulation Review Committee. This vote will like occur at the October meeting of the committee.

#### **Grassroots Communication**

- **Using the attached list we need every CAGCS and CSGA member to e-mail the Regulation Review Committee members in opposition to this regulation using the key messages outlined below.**
- **In addition to using the key messages please personalize your e-mail to your specific golf course's situation.**
- **Please send any response you receive from legislators to John Garcia at [cagcs@sbcglobal.net](mailto:cagcs@sbcglobal.net).**

#### **Key Messages**

- **Golf course superintendents are proud stewards and respect the environment. Because it's in the best interest of every golf course to conserve water superintendents proactively worked with the DEP to develop "Best Management Practices" for golf course water usage.**

## Key Messages (cont'd)

- Golf course water usage systems are expensive to operate and maintain, wet conditions promote the decline of turf quality and playability for our customers, therefore superintendent through BMP are judicious on the amount of water used on a course.
- Golf course superintendents support and appreciate DEP's desire to protect our water resources however the proposed regulation will potentially cause significant fiscal impact to the golf course industry.
- Under this regulation golf courses will be required to drill new wells, expand or create new storage ponds and/or purchase new irrigation systems. All of these solutions come with significant consulting, permitting, legal and installation costs.
- The new permitting process could cost golf courses between \$50,000 and \$650,000, a financial burden that many courses simply can't sustain.
- For many golf courses in the state, the proposed regulation will create an additional financial burden that they will not be able to sustain. Many of the golf courses in the state have been pushed to the brink of bankruptcy and this increase in cost associated with this proposal will cause golf courses to fail.
- Golf courses should be exempt from this regulation, because their irrigation practices accounts for less than 1-percent of the registered and/or permitted water diversion in the state and superintendents maintain BMP.
- Even golf courses that draw from municipal water supplies will see a sharp increase in their water budgets. As municipal utilities spend millions of dollars investing in new infrastructures, distribution systems, and develop new reservoirs and well fields to comply with the regulation their customers will bear the cost of these projects. In addition, golf courses may find their usage curtailed during the time when the courses need a reliable supply.
- According to DEP's own data, only **.4-percent** of the rivers and streams are considered to be at risk. Rather than attempting to apply a board standard to bodies of water that aren't in any danger, DEP should narrow the proposed regulation to focus on these at risk bodies.