

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DC PRESERVATION LEAGUE, *et al.*,

Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF
THE INTERIOR, *et al.*,

Defendants.

Case No. 1:26-cv-477

DECLARATION OF DAVE ROBERTS

1. My name is Dave Roberts. I'm an adult resident of Washington, D.C., and I submit this Declaration in support of the Plaintiffs' Motion for Preliminary Injunction. The statements made in this Declaration are based on my personal knowledge.
2. I play golf frequently at East Potomac Golf Course – at least once per month on average. I have fun playing golf there. While I have played country clubs or other private courses, I play most of my rounds on public courses, and affordable, accessible, engaging public golf is important to me. Back in high school I worked at a summer camp and, every day after work wrapped up, my friends and I from the job would go out to one of the two local public courses near where I grew up and play. That's where I fell

- in love with golf. I bought my first set of clubs that summer with the money that I'd earned at that job.
3. Not long after that, in 1998, I came to Washington, D.C., for college. I never left.
 4. I didn't play much golf during college. But after graduation in 2002, my friends and I played golf all over the D.C. area, as a way of exploring the region. If a golf course was public and within a 90-minute drive from 2002 until about 2010, then we probably played it.
 5. During that time, I played East Potomac Golf Course a lot. It was in rough shape back then. Rounds were slow, and the greens were bad. One year, the maintenance crew applied the wrong chemicals and killed all the grass on the greens. I didn't go back that season.
 6. After that, I mostly wrote off East Potomac. If I was going to dedicate a long Saturday to playing golf with my friends, then I wanted to play at a course in better shape. Even if it took a while to drive there, it still would be as quick as a round at East Potomac.
 7. Eventually, my wife and I had kids and settled into our neighborhood in Southeast Washington. And suddenly, I couldn't throw an entire Saturday at driving out to Maryland or Virginia for a round of golf 70 or 80 miles outside the District. Between 2013 and 2020, I played infrequently. I snuck in rounds whenever I could, but with less time on my hands, most of those rounds were at East Potomac. I travel with a group of college

friends every year on a “buddies trip” for golf – so every year, I relied on East Potomac to gear up for the trip and try to get some rhythm back in my swing.

8. With two young kids, even though I wasn’t playing as much golf, I was still visiting East Potomac. During this stretch I started using East Potomac’s driving range. Instead of cracking open a beer with friends on the upper deck, I was cracking open apple juices from the snack bar with my son and daughter as they enjoyed a day out with dad.
9. When the pandemic hit in 2020, though, my relationship with East Potomac became much more serious. I started playing there on a weekly basis. Tee times could only be reserved seven days in advance – so every week, I stayed up until midnight exactly seven days before I wanted to play, so that I could reserve an early tee time for Saturday or Sunday, knowing that I’d be able to play 18 holes at East Potomac before the business of the weekend took over. I was one of the hardcore guys, teeing off regularly at 6:30 or 7 in the morning, depending on the season, trying to finish my round in less than four hours and get home.
10. I vividly remember the impact that East Potomac had on my mental health during the pandemic. Like a lot of people, I wasn’t leaving my house for work, and my family was home with me all the time. During the first few months, for the most part, the only times that I ever left the house were to play golf at East Potomac. On the mornings that I played, I

would leave my house before sunrise, grab a cup of coffee and a breakfast sandwich from Dunkin Donuts, and then drive to the East Potomac parking lot to sit in my car and watch the sun come up at the golf course. That 20 minutes, once per week, with a sausage, egg, and cheese sandwich and a big cup of coffee, knowing I was about to play a round of golf, and just thinking about the fact that we'd all made it another week – that I'd made it to another Saturday morning – it's a big part of what got me through those two years.

11. Since I started keeping detailed statistics about how I was playing in 2011, I've played more than 2,500 holes at East Potomac. The Blue Course is my favorite of the three courses. I've also played the Red Course a lot with my son, so it has a soft spot in my heart. The White Course isn't my style, although I know that a lot of better players prefer the White Course's greens. No matter what kind of golf course you like or how good a player you are, East Potomac has something for you.
12. When I first heard about the National Links Trust in 2020 and their plans to improve the District's three municipal golf courses, I immediately got excited. NLT told the history of the courses and their vision for them in a way that was deeply compelling. They wanted to make all the changes that we longtime East Potomac players had always sat around and said to each other, "Wouldn't it be cool if...?" I've been a big supporter from the very beginning. Part of my enthusiasm for NLT's plan is that I feel

connected with the history of the golf courses, and they share that passion. Converting East Potomac into a big championship-style golf course like the President has described would destroy all the history that I think is important.

13. NLT's work at East Potomac has been a lot more tangible than just big ideas, though. For the past five years, the greens at East Potomac have been in impeccable shape. For public golfers like me, that's the biggest thing that you want: an opportunity to have putts that roll true.
14. I didn't realize it until NLT took over the course, but before they came along at East Potomac, there was almost no connection between the golf course and the surrounding area. A lot of trees had grown up around the perimeter of the golf course, and even though the Potomac River is right there, you couldn't see it. Now, it's omnipresent. They've done a lot of little things, like taking down the chain-link fence that used to separate the golf course from the rest of East Potomac Park, and also opening up views of Reagan National. They've cleared brush so that a ball hit slightly out of play is still findable. They've added new tee boxes on the third, twelfth, and eighteenth holes that really change the look of those holes from the tee and bring more strategy into the tee shots. They've dug up and replaced broken irrigation pipes and did other maintenance that had been deferred for decades because of the old short-term concession contracts. It's all added up to make East Potomac a great golf experience. There's a

real “sense of place” out there now. NLT has made East Potomac a really beautiful place, and I appreciate that.

15. One of the things that NLT has done well is making East Potomac more than just a golf course. They work to make it a place where everyone feels welcome, even if you don’t play golf. One of the things about East Potomac that I think is really cool is that you’ve got all kinds of different people out there, not just golfers. You’ve got people just going to the driving range, who might never set foot on the course, but they can go out and drink a couple of beers with their friends and hit balls out toward the Potomac. That’s fun. Then you’ve got hardcore golfers. There are cyclists who take a break to buy a snack, a drink, and then hang out on the steps in front of the clubhouse. There are families just discovering all of the facilities there because of the newly renovated mini-golf course. There are public and private high school teams from all over the region practicing. There is First Tee programming, free-lesson Friday, ladies night promotions, disabled veterans programs, and all sorts of other groups that use this public space as their common ground. I enjoy being at East Potomac to be part of that community experience. Giving people a place to hang out after the round has made a big difference to the way people use that space. You don’t just play and go home. East Potomac is more communal than that. And that’s not by accident. That’s part of NLT’s mission. I love that about East Potomac. Abandoning East Potomac’s status quo would cost me a

place where I love being around other golfers, and I would play fewer, if any, rounds there as a result.

16. My favorite stretch of holes at East Potomac is the fifth, sixth, and seventh holes on the Blue Course – mostly because they’re the ones where it’s easiest to put up a good score. Number 5 is a short par-4 where NLT made a pretty big change: they took out a tree that used to stick out over the right side, which made teeing off difficult. It also has one of the cooler greens on the course – probably more slope than any other green at East Potomac. It’s got upper and lower tiers, with a bowl on the front-left of the green, and the upper tier wrapping around behind it. When the hole is cut in that lower bowl, everybody gets excited, because both good players and more average players like me have a chance to hit into the slope above the bowl and use it like a backstop. Number 6 is a good par-5 right along the Washington Channel, and then Number 7 is another short par-4 where you’re teeing off right at the Washington Monument. The fifth hole is where the routing turns back toward the clubhouse, so depending on which way the wind is blowing, you’re either fighting the wind – which is tough – or you’ve got the wind behind you on three holes that are gettable. When that happens, it feels like the world is your oyster. Every time I play and get to the fifth tee, I love the feeling of seeing those holes in front of me. I want to keep being able to see that. Of course, if East Potomac is

converted into a championship-style course, then I won't ever see that view again. That would injure me.

17. I have a lot of great memories at East Potomac. There's an old, dead tree near the end of the fourth hole that used to have a bald eagle nest in it. You'd tee off at the fifth hole, right next to the fourth green, and an eagle would be right there. Sometimes you can still see eagles circling that area of the golf course. I always enjoy seeing that. I also have a lot of memories of being at East Potomac with my kids. For the past few years my son and daughter would come with me each Father's Day to play the Red Course. My son got into it; my daughter not so much, but she sure enjoyed sitting in the golf cart and drinking a Gatorade from the clubhouse.
18. In 2001, one of my friends from the "buddies trips" died from cancer. He and I played the front nine on the Blue Course at East Potomac in September 2000 as we were gearing up for a dream trip to Bandon Dunes in November. He had just driven in from Chicago and was so weak from his cancer treatments that he could barely make it through nine holes. We made it out to Bandon Dunes for five days in November, and that ended up being the last time I saw him before he passed away in May 2021. East Potomac might not be a proxy for Bandon Dunes, but I'll always remember our last nine at East Potomac.
19. One of my favorite things about East Potomac is the role it plays in a city where it's very easy to get "siloed" off from people who are different than

you. We get siloed based on our neighborhoods. We get siloed because of our party affiliations. Your social circle can get very small. But at East Potomac, none of that matters. It's there for everybody. Part of the magic of East Potomac is showing up alone or with one friend, and not knowing who you're going to be paired with to complete your foursome. Often, the people that I meet and interact with for four hours are people who otherwise would be easy for me to avoid. I think there's a lot of good in that. I would lose that, if East Potomac turns into something else. There's a guy who plays at East Potomac who has run unsuccessfully for Congress a few times, and his politics are about as far from mine as they could be – but he and I have played together, and we've had a lot of good hours together. The mantra that I try to bring to my time there is to treasure the time that I'm there – carving out time for myself, but also being open to what the place means to everyone. East Potomac is available for everyone, no matter how good or bad a golfer you are. But if East Potomac goes away, where are people supposed to go to learn about playing golf?

20. East Potomac isn't just a municipal golf course. It's supposed to be something different. It's a showcase of municipal golf, which itself is supposed to be a showcase for golf in a very public, affordable, and very accessible way. It's nice for me to have an enjoyable golf course so close to home that is affordable to play. I rely on East Potomac's affordability. Turning it into a high-end venue capable of hosting major tournaments

would hurt that, and I would not be able to afford to play there as often as I do. I've played golf at plenty of private courses, and I enjoy the opportunity to do that. But I will always be a public golfer at heart, and having a place like East Potomac is important. Being able to visit and play at East Potomac is part of what makes living in D.C. doable, and it's something that I plan to continue doing. D.C. is not always an easy place to raise kids. Finding fields for Little League baseball is harder in D.C. than in other places. Finding a school for your kids is harder in D.C. than in other places. Eventually, you start asking yourself, "Why am I still doing this?" The opportunity to have a place like East Potomac and the common vision for how to continue to improve it while keeping its historical significance that the National Links Trust laid out is part of my answer. Feeling like I'm part of that history is one of the things that I love about East Potomac

21. I've heard the President's descriptions of what he wants to see done at East Potomac. If it happens, then I don't think I'd ever go back. It wouldn't be the same. It will have cost me a golf course that I think is a lot of fun to play. It wouldn't look the same to me. It wouldn't feel historically important to me anymore. There wouldn't be the same people. It wouldn't have the feeling community that I enjoy now. It wouldn't be for regular golfers like me anymore. The greens fees would go through the roof. All of that would harm me. It would close the door on happy memories and what

I thought was going to be a central part of my recreational time with my family. I try not to automatically jump to worst-case scenario, so even if there were just a modest renovation – just knowing how they went about it, I couldn't support that.

22. The dirt that's been dumped at East Potomac is already affecting how the golf course looks and feels to me. It's on the White Course, on the north side of the property. I first saw the dirt when I played golf there in November. It's a big, ugly pile of dirt where there used to be a low triangular area filled with long native grass. There's also a gravel-lined access road that's been built right off Buckeye Drive. The combination of the road and dirt pile basically severs the White Course in two. It looks terrible. It diminishes the beauty that I appreciate about East Potomac.
23. There's a yearly ritual for D.C.-area parents in January and February, when we all scramble to plan summer camps before spots fill up. My son has gone to East Potomac for at least a week each year since NLT took over operations. Last year, he went for three weeks. We would have signed him up again this year, but as a result of Defendants' actions and the changes that have already been made, we didn't include East Potomac camp into his summer at all. The White Course, where all the dirt has been dumped, is the one that my son really looks forward to playing during camp. They usually spend the first few days on the driving range, putting green, and practice holes. Then, they add in the Red Course in the

afternoon on Tuesday or Wednesday, before building up to team matches on the White Course on Thursday afternoon and all day Friday. The White Course is the culmination of the whole week for campers.

24. When I heard about the dirt being moved to East Potomac and then saw it there for myself, I felt violated. It's a violation of the course and how it is meant to be used. It's a violation of the landscape. It's a violation of the basic idea of what federal lands are supposed to be. It's a violation of the social contract that exists between people and their government not to dump trash on protected land.
25. As long as the golf courses stay like they are, I plan to keep playing golf at East Potomac just as frequently as I do now. But if the golf course is turned into something different, then my interest in East Potomac's recreational value and aesthetic value would be injured, and I would go there far less, if at all.
26. If there is a large-scale project to convert the three current courses at East Potomac to a single "championship" course, the construction, landscaping, and other work would make East Potomac, or at least some of the courses, unplayable and inaccessible while it's happening. Because I play and plan to continue playing East Potomac so regularly, course closures like that will mean that I can't play rounds at East Potomac I would otherwise play.

27. I want East Potomac to stay like it has been: with the Blue, White, and Red Courses keeping their historic designs, with the clubhouse in place, and with NLT's plans for the courses allowed to move forward the way the National Park Service decided when they awarded the lease to NLT. And I want to continue playing East Potomac Golf Course that way.

27. I declare under 28 U.S.C. § 1746 and under penalty of perjury that the foregoing is true and correct.

Executed on February 17, 2026, in Washington, D.C.



Dave Roberts