

Presented on behalf of the Vermont Golf Course Superintendents Association (VTGCSA)
By Kevin Komer, CGCS

Golf course superintendents are educated and highly trained individuals that manage golf course properties with an emphasis on environmental stewardship. Our management programs are based on the principles of Integrated Pest Management (IPM). We believe in responsible land management because we are dedicated to the preservation of lands where the game of golf is enjoyed.

Under the current pesticide permit program administered by the Agency of Agriculture, all golf courses are required to submit an integrated pest management (IPM) plan, which is subject to approval by the Agency of Agriculture. Vermont is considered to be on the cutting edge of pesticide regulations for the Golf Course Industry in the country. The current pesticide permit program for golf courses is both protective of the environment and of human health. In addition, restricted-use pesticide applications on golf courses must be conducted by licensed applicators. These license holders must complete sixteen credits of pesticide related education within a five-year period to renew their license.

In 2023, VAAFM updated their pesticide rules to include a 50-foot buffer next to pollinator habitats for insecticides harmful to pollinators. More detail on that rule can be found below.

The VTGCSA would like to offer the following comments on H.706:

1. Golf Course Superintendents are educated professionals who are licensed to use pesticides and follow the label and regulations to use products safely. Neonics are clearly labeled with a "Bee BOX" designation that specifies not to apply the product when plants are in bloom. Additionally, superintendents rely on a regularly updated set of best management practices (BMPs). The BMPs were developed by practitioners and experts from the University of Massachusetts and University of Connecticut. Minimizing the impact of operations on pollinators is a focus of the BMPs.
2. Neonicotinoids are an important component of a golf course IPM program to control the larval grubs of various beetle species that feed on turfgrass roots. Neonics are one class of chemistry that controls most species of beetles and it is important to have more than one chemistry option to avoid resistance issues long term. The VTGCSA believes these products can be used safely on golf course turf. These treatments are effective as a preventative application.
3. Per the Agency of Agriculture's December 2023 submission to the Agricultural Innovation Board, Golf courses used less than 200 pounds of neonicotinoids in 2021 across the state of Vermont. Most golf courses apply these products only once per year.
4. In the golf industry, neonicotinoid applications are predominantly made to the critical short cut turf areas of greens, tees, & fairways. There are also occasional applications to higher cut rough areas, but these are generally spot treatments. Most of these applications are made either early in the morning or in the evening when pollinators are not actively foraging. In addition, pollinators do not forage on turfgrass itself, but rather on the flowers of any weeds that might be present. Most golf course environments are weed free, reducing the exposure to bees.
5. Current research suggests minimal connection between golf course turfgrass applications and pollinator decline. In addition, the trend in the golf course industry is to increase natural or native rough areas, which are not treated and provide habitat for wild pollinators and honeybees.

6. It is unclear how the exemption process in 6 V.S.A. § 1105c would apply to a golf course in a practical sense. As stated above, these are products which are valuable as preventative treatments. An agricultural or environmental emergency is defined as the occurrence of pests, which would suggest that an exemption would allow for curative treatments. By the time an infestation of grubs is visually present on a golf course, it is due to animals digging up the maturing grubs. Those destroyed turf areas will need to be treated with entirely different chemistries, be completely resodded or be closed off depending on the severity and amount of damage.
7. Damage and disruption to golf courses in Vermont is magnified by one of the shortest playing seasons in the United States. Unlike destination-style resorts which can be found in warmer geographies, most Vermont golf courses are small operations which do not have a “safety net” or secondary source of revenue if a course is not in playable condition.

VTGCSA members are educated and trained professionals that make use of neonicotinoid products under regulation by the Agency of Agriculture. Where appropriate, licensed applicators make use of these products as a part of IPM programs and follow BMPs to avoid exposure of pesticides to pollinator populations.

[Link to Vermont Pesticide Rule \(Adopted 2/24/2023\)](#)

5.04 Protection of Bees

- a. No person shall apply a pesticide to a flowering crop, including alfalfa, apple, blueberry, clover, pumpkin, raspberry, squash, or trefoil without prior notification of at least 48 hours to an apiculturist who has an established apiary on the premises.
- b. A person hiring a commercial applicator for an application under Section 5.04(a) shall notify, or cause to be notified, the apiculturist at least 48 hours prior to the application.
- c. A person applying a pesticide that is highly toxic to bees shall:
 1. apply the pesticide during periods and conditions of least exposure, such as early morning or late evening; and when winds are less than nine mph; and
 2. include a 50-foot buffer from pollinator foraging sites, such as natural and semi-natural areas or intentional pollinator plantings or a 20-foot-wide non-pollinator-attractive vegetative barrier higher than the spray release height with an established 60% plant density.
- d. A person shall avoid the application of a fungicide or soil fumigant to pollinator-attractive plants when in bloom.