

**Presented on behalf of the Vermont Golf Course Superintendents Association**

*By Ken Lallier, CGCS*

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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. We believe in responsible land management because we are dedicated to the preservation of the game of golf.

Under the current pesticide permit program administered by the Agency of Agriculture, all golf courses are required to submit a pesticide management plan, which is approved 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.

The VTGCSA would like to offer the following comments on S.200 & H.236;

1. 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.
2. Golf Course Superintendents are educated professionals who are licensed to use pesticides and understand the importance of following the label regulations and using the products safely. The neonics are clearly labeled with a "Bee BOX" designation that specifies not to apply the product when plants are in bloom. This alone reduces the potential impact to pollinators.

Additionally, on golf course turf, most application sites can be irrigated post application, which removes the material from the plant surfaces where foraging insects could come into contact with it. Even though the label does not require the product to be watered in, these products work best when watered in and taken up by the plant.

3. 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, due to the cost of treating large rough areas. 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, particularly in the rough, where flowering weeds are more likely to be present.

4. 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 honey bees.
5. For these reasons, the VtGCSA feels that a ban on neonicotinoids is unjustified and not based on the best current information.

Following is a list of resources for your review:

USDA's Report on Honey Bee Health - 2012

<http://www.usda.gov/documents/ReportHoneyBeeHealth.pdf>

EPA's Web Page on Pollinators

<http://www.epa.gov/opp00001/ecosystem/pollinator/index.html>

EPA News Release

<http://yosemite.epa.gov/opa/admpress.nsf/d0cf6618525a9efb85257359003fb69d/c186766df22b37d485257bc8005b0e64!OpenDocument>

USGA Benefits of Golf Course Roughs for Pollinator Conservation

<http://usgatero.msu.edu/v14/n1-22.pdf>

Landscape Management Bee Friendly Lawn care

<http://landscapemanagement.net/bee-friendly-lawn-care/>

Vt. Agency of Agriculture Neonicotinoid Pesticides; Safety & Use

<http://legislature.vermont.gov/assets/Documents/2016/WorkGroups/House%20Agriculture/Agricultural%20Research/W~Cary%20Giguere~Neonicotinoid%20Pesticides;%20Safety%20and%20Use~2-11-2015.pdf>