



3/25/2022

VTGCSA Comments to the Senate Natural Resources & Energy Committee

Re: H.466 as Introduced

Golf course superintendents in Vermont are educated and highly trained individuals who manage golf course properties with an emphasis on environmental stewardship. The Vermont Golf Course Superintendent Association (VTGCSA) prides itself on responsible land management; we are dedicated to the preservation and proper management of lands where the game of golf is enjoyed. Golf courses are long-standing operators in their communities. VTGCSA's sister organization, the Vermont Golf Association, was established in 1902. Today, over 60 golf clubs currently operate in Vermont, either as part of a greater resort or as standalone properties.

Golf course superintendents work closely and transparently with their regulators to ensure compliance with state oversight. Golf courses are regulated by the Vermont Agency of Agriculture and must have Integrated Pest Management (IPM) and Nutrient Management plans. As part of the IPM plan they submit an irrigation plan to the Agency of Agriculture to ensure protection of surface waters and wetlands. In short, golf courses are subject to substantial oversight. In addition, in 2020, the VTGCSA, along with academic stakeholders including the University of Massachusetts and University of Connecticut, published a Best Management Practices manual for golf course operations. These BMPs contain an extensive set of recommendations including water budgeting, drought planning and water conservation planning. [The BMP document can be accessed through this link.](#)

In terms of surface water usage, we are undertaking a survey to determine the extent to which the proposed draft bill language will be applicable to the golf industry. Although incomplete, we

wanted to flag these scenarios for the committee regarding how golf courses utilize surface waters:

- We believe a number of golf courses are already under varying degrees of state oversight with regard to surface water usage. For example, multiple golf courses have been permitted through Act 250 and have water usage conditions in them.
- Some golf courses irrigate using water held in snowmaking ponds; water usage is analyzed as part of that separate regulatory process.
- We are also aware of golf courses whose surface water withdrawals from streams are already regulated and are based on instream staff gauge readings agreed upon with the state.
- Other golf courses utilize water for irrigation from artificial ponds, which are replenished by runoff and/or groundwater inflows, and do not involve a surface water withdrawal.

We want to make sure the committee understands that in some of these cases, golf course water usage falls under regulatory purview. Additionally, golf course surface water uses are long-standing and are not part of the largely unknown universe of other water withdrawals which this bill aims to discover through the creation of this new program.

Regarding the creation of a new permitting program, golf courses which include surface water usage in Act 250 permits or other regulatory frameworks should not be subject to another permit which may prove duplicative for golf courses and the state. We recommend that language enabling a permit program should be tabled until the state has the data to determine if an additional permitting program is necessary.

With that said, the VTGCSA does not oppose the establishment of a registry as proposed in the draft bill, and we understand that this could be useful in cataloging the various withdrawals occurring from surface waters throughout the state. To the extent that this information is already available from other programs, we hope that information will be useful as well.

Respectfully,

Jason Shattie

General Manager
Burlington Country Club