



October 31, 2017

The Honorable Timothy Sullivan
Lake County Board of County Commissioners

Dear Commissioner Sullivan:

The Environmental Research & Education Foundation (EREF) supports your efforts to improve your fertilizer ordinance and to manage nutrients in Lake County waters. However, we strongly oppose the recent Keep Lake Beautiful (KLB) recommendations for turning the Lake County fertilizer ordinance into a boilerplate copy of the flawed Seminole County fertilizer ordinance.

As you are certainly aware, neighboring Orange County, which adopted its own strict ordinance in 2009, UNINAMOUSLY REJECTED the Seminole County model, as did the Orange County Environmental Protection Commission. Rather, with strong staff support, they retained their more comprehensive model, which includes a four-month summertime fertilizer blackout, but which retains exemptions from the blackout for licensed lawn-care professionals and BMP-trained homeowners. The KLB draft blackout is unfortunately an indiscriminate and punitive ban which treats the bad actors (who fertilize their driveways and sidewalks) and the professionals (who develop and employ strict safeguards) exactly the same! That certainly amounts to punishing the innocent, which is never good public policy.

There are a few things that are crystal clear in this discussion:

- ❑ There is NO scientific support for the blackouts. It is an appealing but unfortunate mythology which runs exactly counter to the vast weight of peer-reviewed soil and agronomic science.
- ❑ The blackouts are NOT supported by FDEP, FDACS, the state's water management districts or UF/IFAS.
- ❑ No local government adopting the summer blackout has experienced ANY identifiable water-quality benefits (please consider the promised blackout "miracle" which has never happened in the Indian River Lagoon area).
- ❑ The MACTEC report regarding urban fertilizer impacts has been expertly peer reviewed and determined to be seriously flawed in its bias and in its findings. It is unthinkable that it should be the basis for policy making in the Wekiva River Basin or anywhere else.
- ❑ Finally, and most importantly, the peer-reviewed FDEP leaching study completed in 2012 demonstrates unequivocally that fertilizer does not leach from actively growing turfgrass under virtually any conditions comparable to the so-called summer rainy season.

Healthy turf is critical to the environmental well-being of Lake County and to the lifestyles of its residents. Healthy turf helps cool the environment, reduce carbon in the air around you, absorb sound, and trap dust and allergens. Most importantly, turfgrass is widely viewed worldwide as a highly-efficient nutrient filter! Starving it during its active growing season might not be a really great idea.

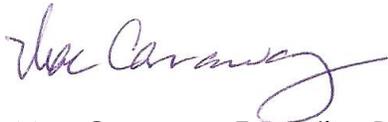
Florida's lawn care professionals, sod growers, golf course managers and other professionals in the green industries continue to do their part to minimize potential nitrogen and phosphorous loading into waterways through ongoing education on techniques and practices that work best for our environment. FDACS-licensed professional fertilizer applicators are trained, educated and certified on proper fertilization practices, and are your first line of defense in responsible fertilizer use.

As we have said before, we all share the common goal of protecting Lake County water bodies from excess nutrient runoff and leaching. We hope we can work together on real education, which is what it will take to make that happen.

Thank you for all you do for Lake County and Florida.

Sincerely,

ENVIRONMENTAL RESEARCH & EDUCATION FOUNDATION

A handwritten signature in purple ink, reading "Mac Carraway". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Mac Carraway, Executive Director