



September 6, 2018

TO: The City of Venice, Florida

Thank you for your continued efforts to minimize non-point nitrogen and phosphorous runoff from entering Sarasota County waterways. The Environmental Research and Education Foundation (EREF) supports fertilizer ordinances as an important component of a comprehensive water quality strategy designed to combat Red Tide. **However, we strongly oppose the City's proposed year-round ban of fertilizers containing nitrogen.**

A year-long ban on fertilizers containing nitrogen will lead to weakened turf health, less efficient filtration of potential pollutants, and harmful erosion, making it easier for all types of urban runoff to reach local waterways. Rather than adopting a year-round ban or increasing your current 4-month summer ban, we suggest that the City increase efforts to educate residents on proper fertilization practices. EREF would welcome the opportunity to partner with the City on this important effort.

Healthy turf is critical to the environmental well-being of Sarasota County. Healthy turf helps cool the environment, reduce carbon in the air around you, absorb sound, and trap dust and allergens. But perhaps the most important environmental and human health benefit of healthy turf is its ability to prevent erosion and to trap and filter runoff pollution that otherwise would flow into waterways. Turf must be healthy and strong to serve as this effective buffer against runoff, and most often this requires at least some amount of responsible fertilization with nitrogen. So-called "summer blends" of fertilizer that substitute nitrogen with micronutrients such as iron or potassium only provide cosmetic benefits – they do not grow healthy turf that provides a buffer against urban runoff. A year-round ban against the use of fertilizers containing nitrogen makes it impossible to grow and maintain healthy turf and places local waterways at substantial risk. As noted further in our attachment, these conclusions are consistent with those underlying the highly-successful water quality protection measures utilized in the Chesapeake Bay region.

As it relates to all so-called "strong" blackouts, FDACS-licensed professional fertilizer applicators are unjustifiably punished under such rules. These professionals are trained, educated and certified on proper fertilization practices. There has been a great deal of scientific, peer-reviewed research conducted on urban landscape and fertilization and the consensus is clear – fertilizer applied properly to healthy turf results in almost zero leaching or runoff, even under extreme conditions of rain or slope of landscape. Please see the attached *FDEP WM869 Study Executive Summary*. Professional lawn care operators and BMP-trained homeowners are your first line of defense against nutrient runoff making its way into Sarasota County waterways. Please also see the attached *Urban Water Quality and Fertilizer Ordinances: Avoiding Unintended Consequences: A Review of the Scientific Literature* by the University of Florida, IFAS. It examines much of

Environmental Research & Education Foundation
3500 South Florida Avenue, Suite 7
Lakeland, Florida 33803
www.EREFFlorida.com / 941-812-3404

the research to date on various fertilizer restrictions, particularly summertime prohibited periods. The preponderance of peer-reviewed research does not support a 4-month fertilizer blackout period, let alone a year-round blackout period, as an effective means towards improving water quality. In addition, such blackouts are not supported by FDEP, FDACS, the state's water management districts or any relevant academic institution.

We understand, however, that some non-professionals are not educated on proper fertilization practices and may misapply fertilizer, and yet no distinction is made even in existing ordinances between those who act irresponsibly and licensed professionals. Careless and ignorant misapplication can cause fertilizer to make its way into local waterways, perhaps even exasperating red tide outbreaks. The members of EREF understand and share your desire to seek solutions to minimize red tide outbreaks, solutions which include addressing the improper application of fertilizers. But a year-round ban on fertilizers containing nitrogen which unjustifiably punishes professional applicators is not the solution, and will inevitably lead to greater water quality degradation.

The real solution lies in teaching proper fertilization and lawn care best practices to residents of the City of Venice **and members of EREF would welcome the opportunity to partner with you on this important task.**

In addition to the body of this letter, EREF has provided an additional attachment which addresses serious issues of policy development related to this matter, along with certain recommendations for action. Please see the attached *Issues Affecting the Development of Evidence-Based Fertilizer Policy*.

Thank you for all you do for the City of Venice and Florida.

Sincerely,

ENVIRONMENTAL RESEARCH & EDUCATION FOUNDATION

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

Mac Carraway, Executive Director

Environmental Research & Education Foundation
3500 South Florida Avenue, Suite 7
Lakeland, Florida 33803
www.EREFFlorida.com / 941-812-3404