



March 9, 2020

TO: The City of Maitland, Florida

RE: City Council Agenda Item IX.3. / Ordinance – Amending Orange County Fertilizer

Dear Members of the City Council:

My name is Mac Carraway and I am the Executive Director of the Environmental Research & Education Foundation, Inc. (EREF). EREF represents professional stakeholders in Florida's green industry, including professionals in sod production, lawn care, golf course and sports turf management, landscaping and related interests.

This letter is attached to our email to you dated this same date. The content of that email is incorporated by reference into this letter. The purpose of this letter and our other attachments is to add to and expand on that email.

While we have consistently supported the Florida Department of Environmental Protection's Model Fertilizer Ordinance as part of a meaningful public education effort to promote responsible fertilizer use, we have consistently opposed the so-called "strong" ordinances with a summertime ban, particularly when they do not exempt experienced, licensed and trained lawn care professionals as previously noted.

The history of fertilizer ordinances in Florida is relevant to your considerations. Specifically, it is clarifying to compare the language and outcomes of past ordinances, some of which, like Orange County's, have been in place for ten years or more.

With respect to the City of Maitland, it is particularly interesting that you are either geographically or politically aligned with both Orange County and Seminole County. These two counties have different approaches to the issue of professional exemptions to the summertime fertilizer restrictions – namely Orange County has the exemption, and Seminole County does not. Importantly, with respect to Seminole County, the City of Sanford rejected Seminole County's persistent arguments to eliminate the exemption, leaving their ordinance consistent with your existing ordinance which includes the professional exemption.

The conclusion to be taken away from these situations is that in the same or similar watersheds, with the same facts and circumstances, there are confusingly different regulatory and political outcomes. The unfortunate reality of these and other similar situations is a chaotic regulatory environment to say the least, and why we consistently argue for a statewide standard. In circumstances like these, which can reasonably be likened to those surrounding the issuance of water use permits within the same

watershed, such conflicting outcomes would be impossible. Rather, a consistent evidence-based approach is demanded.

We have included in our attachments a document entitled **Issues Affecting the Development of Evidence-Based Fertilizer Policy** which addresses some of these concerns in additional detail.

Finally, healthy turf is important to the environmental well-being of the City of Maitland. 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 – the mortal enemy of water quality – and to trap and filter runoff pollution that otherwise would flow into waterways. Turf is one of the most efficient filters on the planet, and must be healthy and strong to serve as an effective buffer against runoff. 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 the best defense against urban runoff. Indiscriminate bans against all use of fertilizers containing nitrogen makes it impossible to grow and maintain healthy turf and places local waterways at substantial risk. Allowing a professional exemption, as well as an exemption pathway for BMP-trained homeowners, mitigates this risk.

The ultimate and lasting solution to improper fertilizer use lies in teaching responsible fertilization and lawn care best practices to residents of the City of Maitland, and EREF would welcome the opportunity to work with you on this important task.

Thank you for all you do for the City of Maitland 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