

Sarasota County Green Industries' Position Paper
April 2007

The Green Industries is providing input to be included in the final report for the Fertilizer Management Program Stakeholders groups. Representatives from all aspects of our industry were involved in all appropriate workshops. Many of us also have the history of working on the first fertilizer ordinance in St. Johns County and on regulations throughout the state, including Citrus County, Crystal River, Jacksonville, and Martin County. Our most recent project has been participating in the state workshops on rule 5E-1.003, regarding urban turf fertilizers used and distributed in the state. The green industries are proud to provide a valuable service to residential and commercial clients throughout Sarasota County. The importance of a pleasing lawn and landscape to our residents and visitors is well documented. Turfgrass has many other benefits as well, including acting as nature's best water filter and rainwater capturing abilities, erosion control, cooling effects, and providing an enjoyable playing surface for all of us.

The green industries support both occupational licensing for anyone applying fertilizers for hire, and certification of the Green Industries Best Management Practices (GIBMPs). Since Sarasota County is looking to be a model for other governments, it is important that their ordinance is both effective and enforceable. The green industries support education of both the industry and homeowners.

There are four issues that the green industries felt were not adequately addressed during the final stakeholder working group meeting. We would like these issues to be included in the full report. They are listed in order of importance:

1. **The GIBMPs should be accepted as the primary tool for professionals.** The state rule 5E-1.003 has included both golf & GIBMPs as the reference for professionals throughout the state. There is a concern that Sarasota County is different, and that while the GIBMPs are a good starting point, the needs of Sarasota County demand a different set of rules. However, the BMPs were written to allow not only professional judgment, but have links to the most current University of Florida documents that provide recommendations for different parts of the state. Not accepting the GIBMPs for the professional puts the pest control operator on the same level as the lay person! Pest control businesses are highly regulated with insurance, training, and licensing requirements. The link for the GIBMPs is http://www.dep.state.fl.us/water/nonpoint/docs/nonpoint/BMP_Book_final.pdf . As an industry, we are concerned that Sarasota County is considering setting aside a document created in conjunction with the Florida Department of Environmental Protection (as well as many other agencies) without due cause.
2. **Specific types of fertilizer should not be encouraged or discouraged. The way these tools are used is much more important than their content.** There is an inaccurate assumption that slow release fertilizers are somehow safer to the environment than soluble or quick release. This simply is not true. Low rates of

quick release applied properly by professionals can be gentler on the environment compared to a large dose of slow release improperly applied to impervious surfaces such as sidewalks. A low rate of soluble fertilizer dissolves quickly and moves into the soil and root zone where it is soon used by the plant. Should a heavily coated slow release material be improperly applied and migrate into a waterway, it will release in the water over time, thereby creating a problem. All fertilizers must be applied with professional care, and to insinuate that one type of product provides a greater margin of safety ignores reality.

3. **Turfgrass fertilization should not be prohibited during the summer months. Turfgrass is an excellent water filter, and requires inputs to do its job.** The theory is that when it rains, fertilizer washes through our sandy soils. This intuition is not supported by facts. Research in Florida and throughout the U.S. shows that turfgrass actually grabs nutrients very effectively. There is a large body of information that confirms that regardless of soil type, turf traps and uses nutrients. Whether it is the warm sands of Florida, cold sands of Rhode Island, or clay soils of Pennsylvania, there is a book of knowledge supporting the value of turfgrass. Encouraging fertilization during times when the turf may be semi-dormant is both unnecessary and may produce the opposite result of what the ordinance intends.
4. **The buffer zone should not be arbitrarily increased from 3' to 10 or 15'.** The concern from some in the group appears to be that downward movement of nutrients (leaching) is not the biggest problem. They feel that it is runoff from the compacted soils on slopes. There is sufficient work from University of Florida and other land grant universities to show that nutrient runoff is insignificant. Dr. Jerry Sartain, Dr. George Snyder, and Dr. John Cisar all have conducted work to show that nutrient runoff from turf is insignificant.

The green industries participated in the stakeholder workshops in good faith. We were disappointed that not a single University of Florida researcher was involved in any workshop to give science based guidance on the development of this ordinance. The GIBMPs were fully accepted into the statewide labeling and distribution rule. We were heartened to see Sarasota County Consultant Mike Holsinger present at the recent turf plot tour in Citra, which was held on March 29th prior to the noticed workshop for rule 5E-1.003. The data presented at this tour was preliminary, but continues to confirm previous work completed both in Florida and on turf throughout the country which supports the fact that healthy turfgrass improves water quality and that properly applied fertilizer does not leach or runoff.

Writing a sound and enforceable ordinance, based in science is supported by all of us. A well written ordinance will achieve our shared goal of maintaining the beauty of Sarasota County's lawns and landscapes in an environmentally sound manner. Remember that we are not just members of the green industries; we are members of the community. We live here, we work here, we contribute to the economy, and we create jobs. Our goals are not

disparate... more than ever our goals are one in the same. We look forward to working with Sarasota County on this very important issue.

April 6, 2007

Dear COUNTY COMMISSIONER NAME,

The green industries are presenting this position paper to each county commissioner. We are providing input to be included in the final report for the Fertilizer Management Program Stakeholders groups. We appreciate the opportunity for this information to be a part of the overall document and present it to you for your consideration.

Sincerely,

WHO???
FPMA

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