



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

March 2, 2011

Mr. Mac Hatcher
Senior Environmental Specialist
Collier County Growth Management Division

Mr. Hatcher:

I have been asked by Commissioner Putnam to reply to your request to review and comment on Collier County's draft fertilizer ordinance. We have reviewed Collier County's proposed fertilizer ordinance and accompanying documents. Absent from the provided literature was scientific justification sustaining the efficacy of Collier County's proposed standards more stringent than the Department of Environmental Protection's model fertilizer ordinance.

The letter provided from the Conservancy of Southwest Florida highlighted the perceived impacts of nutrient pollution, but did not cite scientific justification for the proposed standards more stringent than the model ordinance. As noted in your request, the concentration of N migrating to surface water from native upland and undeveloped areas receiving no fertilization is 1.15 mg/L. The concentration of N in surface water originating from assumed routinely fertilized residential areas is 1.18 mg/L. Based on these findings one could conclude that the N migrating from residential turf is at the baseline of undeveloped areas therefore turf does an efficient job of absorbing any applied N and minimizes nutrient migration to ground and surface waters. It is imperative we do not discount the agronomic needs of turf, and turfgrass requires a constant supply of nutrients during the active growing season to maintain its health and vigor. The proposed adoption of unsubstantiated standards jeopardizes turf health and its filtration capabilities.

In the absence of scientific confirmation of the effectiveness of the proposed more stringent standards, the Department of Agriculture and Consumer Services, endorses the adoption of the model ordinance as written. A tremendous effort went into the development of this document, which encompassed a broad spectrum of stakeholders and consideration of the best available science pertaining to this issue.

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We appreciate the opportunity to comment on the proposed Collier County fertilizer ordinance. In the absence of definitive science supporting more stringent standards; we advocate the adoption of the model ordinance as written until research demonstrates otherwise. While we understand the need to protect and ensure Florida's water quality for future generations, we also recognize that there must be symmetry between the environmental consequence of regulating fertilization, and the agronomic needs of turf - the primary filtration system to ensure excessive nutrients do not contaminate our ground and surface waters.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

A handwritten signature in black ink, appearing to read "Weldon Collier", written in a cursive style.

Weldon Collier, Program Planning Coordinator
Division of Agricultural Environmental Services

cc: Anderson H. Rackley, Director
Steve Dwinell, Assistant Director