

# Orange County Fertilizer Ordinance

February 8, 2022

Comments of Adam W. Jones

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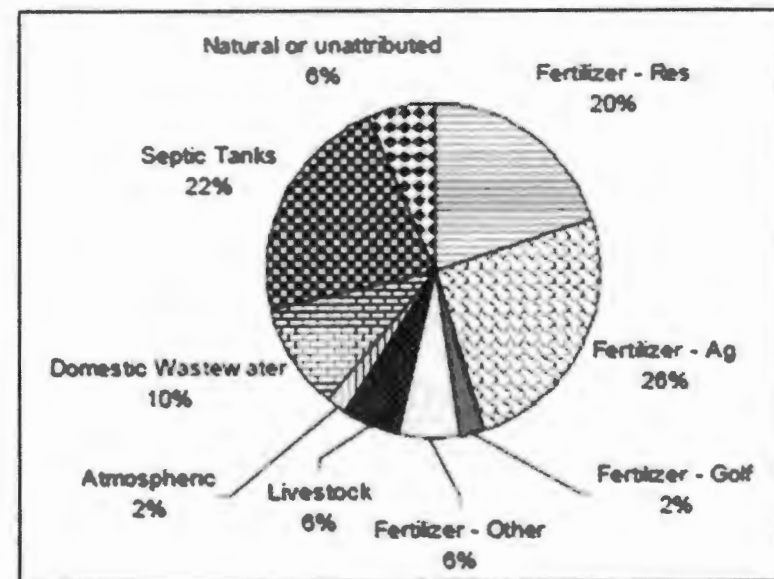
# The False Narratives

- THE % OF NITROGEN LOADING IN THE WEKIVA RIVER BASIN
- SUMMER SEASON RAPID LOADING DUE TO FREQUENT RAINFALL
- LESS ANNUAL NITROGEN APPLIED TO TURFGRASS WILL LEAD TO BETTER WATER QUALITY

# The Infamous MACTEC Pie Charts

- Calculated 2789 metric tons per year of residential fertilizer is applied to the Wekiva River Basin Watershed.
- In order for this to be true 73% of the lawn fertilizer sold in Lake, Orange, and Seminole County would have to have been applied to 5% of the total land mass in these 3 counties. This is not a reasonable assumption
- A peer review of the data shows that in fact 299 MT of residential fertilizer is applied. This is only 10 % of the amount in the final MACTEC report.
- Activists use this chart to falsely indicate that it represents loading in all watersheds

Figure ES-3. Nitrate Loadings to the Wekiva Basin, Partitioned by Source

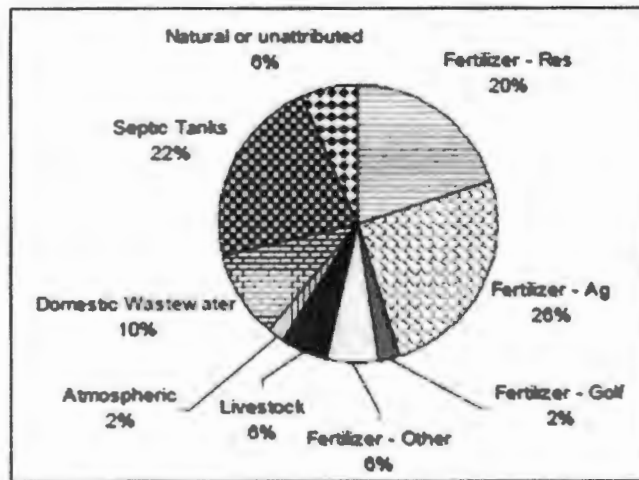


Source: MACTEC  
Created by: SAR Checked by: WAT

# Comparisons

## Phase 1 Pie Chart

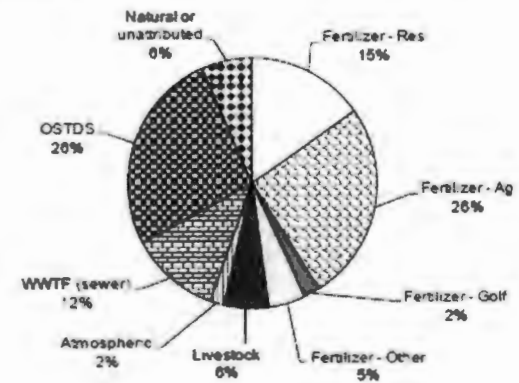
Figure ES-3. Nitrate Loadings to the Wekiva Basin, Partitioned by Source



Source: MACTEC  
Created by: SAR Checked by: WAT

## Phase 2 Pie Chart

Figure ES-2. Nitrate Loadings to the Wekiva Basin, Partitioned by Source



Source: MACTEC  
Created by: SAR Checked by: WAT

# THE FALLACY OF THE SUMMER RAINY SEASON BAN

- The well samples within the study area do not show seasonality to Nitrate concentrations in groundwater
- We have had a fertilizer Ordinance in place since 2009. If summer fertilization was the cause of the issue we should see improvements.
  - There is no improvement in water quality despite the regulations
  - No watershed in Florida has seen a statistical improvement post summer fertilizer bans.
  - The only peer reviewed science on this issue infers that these ordinances may in fact be contributing to ongoing water quality decline

# THE FALLACY THAT LOWER FERTILIZER RATES MEANS LESS POLLUTION

- The goal of any regulatory guidance on this issue should be to maximize the positive filtration impact of turfgrass green spaces.
- Activists are asserting that 2 lbs. of N per year is adequate for healthy lawns. This is false
- Staff has recommended 3 lbs. of N per year.
  - Industry is using this as a baseline loading for several years
  - A significant % of lawns require supplemental inputs during the summer to achieve acceptable color and density. Iron or other micronutrient supplements can't fix the N deficiencies.
- Industry recommends up to 4 lbs. of N per year.
  - Peer reviewed studies show that in Central Florida, 4lbs of N to St. Augustinegrass is the minimum rate for acceptable quality and maximum filtration effect.

## SETBACKS SHOULD NOT BE INCREASED TO 25 FEET

- This guidance is not supported by any scientific study.
- It is arbitrary and capricious and without any credible justification.
- Homeowners have a right to maintain and manage their own property.