May 5, 2023

Hernando County Board of County Commissioners Via email to planning@hernandocounty.us Re: Submission for BOCC Agenda packet for May 13<sup>th</sup>. 2025 hearing on Fertilizer Ordinance

## Dear Chair& Commissioners:

The members and supporters of the Sierra Club Adventure Coast Group urge you to keep the strict rainy season urban fertilizer ban in place because it is a fiscally conservative, low-cost, and effective policy to reduce nutrient loading to our impaired springs and waterways. Two years ago, you unanimously voted to add a rainy season ban on nitrogen and phosphorus fertilizer to the ordinance. It was a smart move then, based on sound scientific data, and it still is today.

You joined <u>18 counties and over one hundred communities</u> with similar bans. Compliant products are available for use year-round at local retail stores: slow-release nitrogen for use during the non-restricted season and summer safe alternatives with key micronutrients like magnesium and iron to keep the grass green and healthy. The county has implemented an outreach program to notify property owners, and stores are provided with signage. Studies show that residents comply once notified.

At the March 25th BOCC hearing, Dr. J. Bryan Unruh of IFAS presented studies of south and northeast Florida lawns showing nutrient reductions are greater in winter during the growing season for urban lawns than in summer, citing "low improvement" in summer months. He questioned summer bans, saying that lawns need fertilizer in those months and recommended expanding the winter season and dropping the summer ban.

However, he did not account for local conditions in Hernando County and none of the areas he studied included any the watersheds for <u>Outstanding Florida Springs</u>, first-magnitude Florida Springs such as Weeki Wachee. Rainfall in Hernando over the past 50 years is about double during the rainy season of June--September than the rest of the year (see the attached NOAA chart). Theattached SWFWMD maps show that the highest Hernando County rainfall for the past three years was during the June—September 2024 "Wet Season." Torrential summer rainstorms wash away fertilizer and promote harmful algal blooms and seagrass die-off. Restricting urban fertilizer use containing N and P will reduce summertime nutrient loading and improve water quality.

The <u>Florida Fertilizer Consumer Task Force concluded</u> long ago that a watershed-by-watershed approach is best, so local governments can protect their waterfront economies from urban fertilizer pollution. On March 25<sup>th</sup>, Hernando County Utilities Director Gordon Onderdonk noted that the rainy

season ban is a cost-effective way to meet FDEP's Basin Management Action Plans (BMAPs) to reduce nutrients in our springs. The attached Weeki Wachee BMAP chart shows total average daily nitrate averages of 0.28 milligrams per liter (mg/l) for Weeki Wachee Spring and 0.20mg/l for Weeki Wachee River. The attached SWFWMD Groundwater Quality Viewer map of Total Nitrate and Nitrite in groundwater shows four areas in Hernando County ranked in the High Range for those nutrients. The attached SWFWMD chart of nitrites from 2011 shows the rapid increase in nitrates that coincided with the growth of suburban Spring Hill. More roofs and lawns = more nutrients. The attached Draft NSILT Loading Results & BMAP Updates for Weeki Wachee show that Urban Turf Fertilizer accounts for 240,059 pounds per year of nitrogen into the spring group. The state mandates a reduction of all categories by 69%, or 213,644 pounds per year, plus additional reductions for the Homosassa/ Chassahowitzka Springs Group, also found within the jurisdictional boundaries of Hernando County.

The county will spend \$3 million on septic-to-sewer projects for 450 lots that will remove 4600 pounds of nutrients, less than a quarter of what the rainy season ban will achieve for little to no expense. The attached table shows that removing the rainy season ban would result in an estimated 33,264 pounds of additional nutrient loading attributed to the spring sheds of Hernando County per year, for a total of 50,831 pounds instead of 28,403 pounds with the rainy season ban.

Taxpayers understand that the rainy season ban is a smart, cost-effective way for Hernando County to reduce nutrients, and there is broad support for it. The current ban has been in effect for two years without time to show positive results. Changing the dates now would create more, not less, confusion.

Telling people to, "Skip the fertilizer to protect our fun" is a clear message and one that social marketing campaigns like <u>Be Floridian Now</u> have been using for years. No one is opposed to preventing toxic algal blooms that result in seagrass die-offs and manatee deaths in our springs. The springs drive our nature tourism economy and quality of life. The rainy season ban is a smart, fiscally conservative policy and a proven strategy to reduce nutrients.

In the end, it costs more and delays results if we rely on more expensive strategies alone. Keep the rainy season ban. There is no valid defense for removing it.

Very truly yours,
GhhYrq#Txlror
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Chair, Sierra Club Adventure Coast Group
Enclosures per above