From Richard Calarco, Hebron Parks + Rec Director

Thank you for allowing me to respond to the articles.

Cost comparison of conventional (chemical) turf management and natural (organic) turf management for school fields.

First and foremost, the authors of the articles have commercial business which benefits from adopting organic program in the field.
In comparison of the conventional and non-conventional practices many assumptions, in my experience and that of University research faculty have not confirmed.

Capital Equipment

You will note that the cost of capital equipment is $10,000 to $12,000 for a period of 3 years. These numbers never appear in the cost analysis.

Irrigation

First and foremost note that his report states the need to irrigate. Which is clearly a capital cost which is not included in the analysis? The report also states that water usages is less for organic than conventional which according to research the same amount of water is needed for turf grass not matter how it is treated conventional or organic. (Note most k-8 fields are non –irrigated)

Fertilization

A plant is unable to determine if its source of food is organic or not. In UCONN's "Best Management Practices" and in all research that I have found turf grass plants requires at least 3 lbs of nitrogen per year. Yet in his cost analysis as the years moved forward less and less fertilization in being applied which contradicts all research, especially for pesticide free fields.

Additionally, it show a number of conventional fertilization that does not take into account slow release fertilizers that eliminate applications and feed soil for months.

Grub/Insect

His analysis shows no cost associated with organic while a cost appears in the convention approach. I have spent $1,200 to purchase nematodes to attack the problem.

Weed Control

Note in conventional plan, there is a cost in non-conventional there is not.

Research has shown that our defense is seeding on pesticide free fields at a rate of 35-45 lbs per 1000. (Best Management Practices) while conventional is 5lbs per 1000. (Note no mention of Fence line controls)

My research on the matter includes the following articles:

- Best Management Practices UCONN, turf@uconn.edu (Dr. Henderson)
- University of Tennessee-Turf Grass Maintenance
- Topdressing with compost, a more sustainable and affordable alternative-Ohio State Marcela Manzo

- Strategies for Maintaining Turfgrass in Response to "No Pesticide" Legislation Vickie Wallace UCONN
- Weed control with synthetic herbicides-Dr. Doug Linde

- Managing athletic fields without traditional pesticides- Dr. Eric Lyons University of Guelph
- Prevention, IPM organic management system for school and municipal-Brad Park Rutgers

Summary

As you can see the comparison does not truly compare conventional programs with organics programs. Also, there are other items of note such as that there are many organic products that are banned due to EPA # restrictions and 25B Products do not have any toxicity/efficacy tests. When we use these products we need to apply then every 2-3 weeks (research) Note no mention of Fence lines.

Guidance on chapter 85, laws of 2010.

The recommendation of the M.O.R.E.Committee was to use "Best Management Practices" utilizing IPM and have DEEP appoint (per state regulation) Advisory Committee made of members of our scientific community.

In reading the New York law, note that it states a public board of education can determine an emergency. In our state, we have DEEP which has highly regulated program which requires CEU's to maintain certification. The M.O.R.E. Commission recommendation would not only require this process to be in place but by using a scientific advisory board to review the products and would provide a safer application of products. This advisory board would take into account environmental and human safety, while a board of education, would not have this expertise.

I hope this helps and please let me know if you need any additional information.