Submitter: Dan Keeley

On Behalf Of:

Committee: Senate Committee On Natural Resources and

Wildfire

Measure, Appointment or

Topic:

SB747

Hon. Senator Golden and members of the natural Resources and Wildfire committee

I am testifying in opposition to SB 747. As a hazelnut grower, I am very familiar with the three Rs, applying the Right plant nutrients at the Right time, in the Right amount. With the current cost of those inputs not over using or wasting them is critical, not just to our water but also to my financial survival. SB 747 is attempting to fix a problem that largely does not currently exist among commercial farmers.

Secondly, the bill over simplifies the use of fertilizers to the point of being useless. Fertilizer rates vary widely based on crop and soil type, weather, other agronomic practices, and a host of other factors. Rates alone cannot determine overapplication, and there is no standardized guidance on rates based on the variety of factors that can impact nutrient needs and uptake. Agronomic rates vary even between different varieties of the same crop. This issue deserves a robust, collaborative discussion with growers and experts and the money SB747 would cost could be much better spent in sampling enough wells to define what is largely a legacy problem and educating small holders and suburbanites in stewardship. For an example, see the Oregon Nut growers Society Stewardship Program.

Thirdly, growers are struggling under the sheer volume of rules in Oregon. Smaller growers like me already cannot keep up with the amount of paperwork attempting to make the world perfectly safe and spotless. Please don't add to the burden, especially not with rules that would impossible to administer and ineffective as well.

Please vote no on SB 747. Dan Keeley