



541.387.4769 • PO Box 168, Odell, Oregon 97044 • cgfg.org

February 3, 2025

Chair Golden, Vice Chair Nash and Committee Members,

Columbia Gorge Fruit Growers Association represents the pear, cherry, and apple growers in five counties in the Mid-Columbia region. We **strongly oppose** Senate Bill 747 as it is currently drafted.

High costs of fertilizer, coupled with non-existent profit margins in agriculture, already discourage our members from applying more fertilizer than what is absolutely necessary to support the crops each year. For fruit tree growers, over-applying fertilizer isn't just a waste of money, it has a negative impact on the trees, causing them to grow an abundance of non-fruit bearing wood and creating higher labor costs for harvest and pruning seasons.

Growers often use soil tests to develop a better understanding of our fertilizer needs. In a single orchard, soil tests from one block to the next will show different nutrient levels, pH measures, and physical properties that impact the soil's ability to absorb water and other nutrients. This makes our fertilizer needs vary widely based on many factors: soil type, weather, nutrient needs, commodity and variety planted, etc. Different varieties of our pears, cherries and apples also require different fertilizer rates, despite being planted only a few feet apart. For example, summer pears often require a higher rate of fertilizer than winter pears.

Our fertilizer rates also vary from year to year depending on crop load. During a lighter crop year, less fertilizer is needed; if the next year brings a heavy crop, it is possible that growers need to do a second application later in the growing season to support the crop load in the trees. Application rate alone is an inaccurate measure for determining "overapplication" of fertilizer and should not be used as the sole method.

There is no standardized guidance on rates, and there is no methodology for determining "overapplication" that could be applied to all locations, commodities and varieties across the state because so many variables must be considered. This is why growers work closely with experts in soil science and crop nutrition on a regular basis to determine best practices for fertilizer content and application rates.

With civil penalties of up to \$10,000 per violation included in this legislation, growers could be forced to pay huge amounts of money even when following responsible best practices and doing everything in our control to reduce fertilizer usage, simply because this policy was written without any knowledge of the science

behind it. This concept - as it is currently drafted - shows a complete lack of understanding of the science behind soils, crop nutrition, and groundwater impacts.

Growers strive to be good stewards of the land, and we believe that maintaining a safe water supply is an important responsibility that everyone shares, including agricultural producers. We support protecting Oregon's groundwater, but this legislation is a misguided attempt at doing so. If Oregon's lawmakers truly want to take steps toward reducing fertilizer's impact on groundwater, then you must work with producers and soil nutrition experts to create policy that will accomplish that, not follow this misguided concept created by lawmakers that have no background or experience in agriculture.

While the intention behind this bill is worthwhile, the outcome of this legislation will not be. If the issue of protecting Oregon's groundwater is to truly be addressed, then legislators have a responsibility to listen to the experts in this scientific field and work with them to develop an effective program. Unfortunately, Senate Bill 747 – as it is currently drafted – is nothing more than arbitrary and ultimately meaningless policy that will cost the state and the agricultural industry a lot of time and money, and will not lead to improved protection of Oregon's most precious natural resource.

Thank you,

A handwritten signature in blue ink that reads "Mike Doke" with a long horizontal flourish extending to the right.

Mike Doke
Executive Director