My name is Richard Montecucco, and I am a 4th generation farmer. Along with my two brothers, and our cousin, we represent Montecucco Farms. We produce organic and conventional crops that include: turnips, rutabagas, beets, parsnips, rhubarb, green beans, and most recently carrots on 1,000 acres of land.

I am writing to your governing body to express our concern with Senate Bill 747. As a medium sized farm, we feel that this bill will negatively impact not just our operations but the operation of many small to medium sized farms in Oregon.

As a business farming is a capital intensive, price volatile occupation, with high risk and low return. Our margins are continually shrinking due to external forces including mandatory overtime, competitive markets out of Mexico, and ultimately increased regulations from both the State and Federal governments.

Senate Bill 747 is a great example of regulation for the sake of having a regulation. It will not accomplish what it sets out to do and there will be another regulation that hinders farms from continuing in the State of Oregon.

The point of this regulation is to prevent the overuse of fertilizers by farming operations to help reduce the nitrate run off into our rivers and freshwater resources. As a farmer I can tell you that outside of labor costs and land rents our next largest expense is fertilizer. Farms spend money and time researching the proper amount of fertilizer to use to have success with their crops. Many variables have to be take into account such as soil composition and nutrient density. The goal is to maximize our crops output while also not wasting valuable and expensive resources like fertilizer. We want our crops to take up the fertilizer without leaving large quantities behind. Over fertilizing can cause several negative outcomes including: shorter shelf life, poor storage, oversized produce, and even crop poisoning. Fertilizer does not adhere to the adage that if a little is good then more is better.

Some additional concerns are related to the bill as it is currently written it only applies to farms over 200 acres. According to the Department of Agriculture there are 35,547 farms and 82.9% of those farms are under 200 acres. As any farmer can tell you it doesn't matter if your operation is 200 acres or less you still use the same density of fertilizer on your crops. To exclude 82.9% of farms from regulation while burdening larger operations seems to miss the point of the bills goal to reduce nitrates in water runoff.

Then this leads to the other large consumer of fertilizers and that would be your everyday homeowners who do not do any research on how much fertilizer their lawns need to maintain their health. A group that truly believes that if a little is good then more must be better to maintain their green lawns.

Lastly, we also have concerns about how proper usage will be decided and what group will decide how much fertilizer any crop will require. As a farmer I can tell you that the science and research we do to ensure proper use of fertilizer is based on many variables such as location, soil composition, average rainfall, previous crops grown, etc. Every field has different specific needs based on these variables. Along with agronomists, farmers do weekly field checks to monitor crop health and output. Not just our livelihoods but also our margins depend on the health of our crops, a very important fact that this Senate Bill 747 seems to not consider with increased regulations.

As a large contributor to food safety, local economies, the job market, farmers should be included in the conversation when bills like this are drafted, not included after the fact. I believe senators,

representatives, and the citizens bringing this concern to the table should reach out and speak to farmers across the table so we can have a voice in the conversation. We are large believers in field health, freshwater resources, protecting the natural resources that are shared by everyone in our communities and state. We would love the opportunity to find proactive solutions, discuss our neighbors' concerns, and ultimately work together to find the most beneficial solution.

Given the lack of time to understand the bill, the lack of clear regulatory process, this bill is truly just a regulation for the sake of regulation. It doesn't accomplish what it sets out to do, creates unnecessary regulations, places a burden on business, and we ask that you strongly oppose SB747.