

To:

Ways and Means Subcommittee on Natural Resources-Chairs Edwards and Unger and members of the committee,

My name is Nick Tichinin, I reside and 4965 Matney Rd. Monmouth Oregon. I am the owner of Universal Seed Company, a vegetable seed production company that produces seed in the Willamette Valley for sale through out the world. I also grow vegetable seeds in the Valley on my own farm. I am currently the Vice President of the Willamette Valley Specialty Seed Association (WVSSA). I am here today on behalf of myself, the WVSSA, the 80+ seed growers contracted by my company and the 200+ vegetable specialty seed growers in the Willamette Valley. This is a very busy time of the year for specialty seed crop farmers and with short notice of this hearing we unfortunately have not been able to get much attendance. So I speak on behalf of those who can not attend today.

The specific issue today is the cost of, and funding for, a study to determine the impact of allowing the production of canola in the Willamette Valley and area until recently protected by ODA administrative rule. I believe that the proposed budget of 1 million is quite high and could be substantially reduced by focusing on the core issue, what will be the impact of canola production on the existing industries in the Willamette Valley. Specifically, fresh market vegetable, specialty seed, clover seed and grass seed.

First, the study should consist of a thorough literature review of all material relating to the impact of large-scale canola production on vegetable seed production in other areas of the world including Europe. This should likely include interviews as well. This needs to be a scientific and unbiased review. There seems to be some sense that the possible co-existence of canola production and specialty seed production will be different in the Willamette Valley than other places in the world. A thorough review should lay a base line reality.

**Objective 1:**

Monitor fields of canola, turnip and radish. I believe this is a valid and necessary objective. However in by professional opinion, based on more than 30 years experience in brassica seed production, these fields will need to be monitored for a minimum of 5 years. The proposed 3 years will provide inconclusive and invalid results. The reason being that canola will be grown in rotation with grass seed. Grass seed plantings are generally left untouched for 3-4 years(or longer). The seeds near the soil surface will germinate and be controlled with the use of phenoxy herbicides in the first 1-2 years after planting. However the potentially large latent seed bank in the soil will not be realized until the grass field is again rotated generally 3-5 years.

**Objective 2:**

Study cross pollination: This is an unnecessary expenditure. Cross pollination in brassicas has been widely studied by university researchers though out the world for decades. This information is readily available and established in peer reviewed literature.

**Objective 3:** Map the valley for available acres for brassica production to determine the theoretical number of acres of brassicas that can be grown without harming the existing industries. This proposal is fraught with problems. This "available acres" figure is an unattainable number and a theoretical map is a waste of resources. This presumes that all growers and all suitable ground is "available". What growers are really available? Growers are vastly different in technical abilities and the related species do not require the same technical input. Furthermore, not all qualified growers are interested in specialty seed production, nor canola. Next, what ground is really available? The acceptability of acreage depends on soil conditions. Suitability for an open pollinated seed crop is far more flexible than for a high value hybrid seed crop of a related species. No one is going to be able to define now or in the future exactly the mix of seed crop soil requirements. On top of that, is the crop an over-wintering species or a spring annual? Only some ground will over-winter a specialty seed crop. The inventory of soils that will produce fall planted and spring planted Brassica species is not the same, though it can be overlapping. This bullet point might appear to be a "reasonable" goal, but is defies logic. Further it is referenced that the WVSSA pinning map information must be accessed to get the number of acres and location of all fields for the last five years as well as going forward. First this information is impossible to attain historically. Second this is private information of the individual companies and would violate anti-trust laws to force the companies to divulge this information. This objective is expensive and will provide not useful information. It appears reasonable but is unworkable.

I believe that a more focused study would be useful in achieving the objective and far less costly.