

Submitter: Jason Myer
On Behalf Of:
Committee: Senate Committee On Natural Resources and
Wildfire
Measure, Appointment or Topic: SB747

Dear legislature,

As someone who works directly in agriculture science and getting farms to adopt better environmental practices, I am writing to urge you to oppose SB 747.

Working to mitigate excess fertilizer runoff is an admirable goal which I (and speaking for the ag industry I work with) support. However, this bill is woefully short and lacks a basic scientific basis which would result in onerous regulatory burden on farms and penalization of individuals who are utilizing completely scientifically defensible levels of fertilizer. Soil science is very complex and this bill is using only the smallest subset of metrics to make a judgement of whether fertilizer is being over applied. Pounds per acre is not an appropriate measurement for determining whether excessive fertilizer is applied. i.e. 5 lbs/a of Nitrogen can be excessive or deficient from one location to another. This is because there are far more factors that come into play when fertilizing is conducted that this bill does not consider. To name just a few: Soil type, porosity, organic matter content, slope, irrigation type, irrigation scheduling, mineral content of soils, existing nutrient composition of the soil, fertilizer form, fertilizer application method, proximity to water sources, weather conditions, etc.

Furthermore, one of the uncomfortable truths is that small farms are most likely to over apply fertilizers but they are exempt in this bill. This is not a fault of their own, but rather a result of being a smaller operation that cannot absorb costs of extensive soil sampling/testing and outside consulting that larger operations can afford and use to precisely determine their fertilizer needs. So small farms are having to make "best guesses" for fertilizer needs which often errs on the side of too much. Ultimately though, market forces incentivize farms to not over apply fertilizer as any excessive input is taking out of their bottom line.

So again, I implore you to oppose this bill. Alternatively, consider an approach that provides assistance to small farms to test their soils and get assistance in determining their fertilizer needs versus a punitive approach that will likely penalize those who are not contributing to the problem.

Thank you