

Submitter: Tom Thomson
On Behalf Of: self
Committee: Senate Committee On Natural Resources and
Wildfire
Measure, Appointment or Topic: SB747

SB 47 Clarifications

1. The bill as written currently requires only landowners to report fertilizer use. However, many field are rented out and often the landowner has no idea of the renters' practices. Perhaps the bill should use the words landowners and/or tenants.
2. The 200-acre figure seems arbitrary and dismisses the proximity to waters of the state, permeability of the soil, weather at application, etc. All factors which influence the overland flow and/or soil permeability which may facilitate nutrient loss. For example, a 5-acre pasture abutting a stream that is fertilized with large amounts of commercial fertilizer or animal manure may have a larger impact on water quality than a 200 ace field properly fertilized at agronomic rates.
3. Determining the agronomic rate of fertilizer necessitates computing a mass balance for the nutrients in questions. That is, if one records the amount of nutrients applied versus the amount of nutrient removed by a crop, one can ascertain if a proper rate was used. Section 3 of this bill only asks for the rate of nutrients applied and does not mention crop yield.
4. Crop yields in Oregon are not unfirmly even across the landscape and will vary from field to field as well as within fields. Thus using some "book value" of crop yields to determine overapplication of a nutrient will, in many cases, lead to erroneous assumptions about an individual's fertilizer use.

Thank you for your consideration,

=====
Tom Thomson Northwest Agricultural Consulting
1275 Oak Villa Road nwagtom@gmail.com
Dallas, Oregon 97338 Phone 503-510-3883

"The only difference between a problem and a solution is that everyone understands the solution." Charles Kettering
=====