



Malheur County

ONION GROWERS ASSOCIATION

"The Home of Mild Sweet Spanish Onions"

710 S. W. 5th Avenue . . . Ontario, Oregon 97914

Phone (541) 881-1417

March 25, 2026

Oregon Department of Agriculture
c/o Casey Prentiss

Dear ODA,

The Malheur County Onion Growers' Association represents all onion growers in Malheur County, which is the nation's largest onion producing county. The 2025-2026 onion growing and shipping season has been extremely challenging for our growers and shippers, which has produced an unusually large amount of cull onions.

The Malheur County Onion Maggot Control Order (OAR 603-052-0360) has been instrumental in helping to protect the region's onion crop from the onion maggot (*Delia antiqua*)¹. However, some modifications to the rule would aid growers and shippers in disposing of cull onions, especially in years such as the 2025-2026 season where excessive amounts of culls that need to be disposed of.

A significant improvement would be to revise the control order area. At present, the maggot control area includes all of Malheur County. However, onions are only grown in a small area of northeastern Malheur County. The actual onion production area extends from the Annex area in the north, up the Willow Creek drainage along Highway 26 to the Jamieson and Brogan communities to the northwest, then west to an area about 10 miles west of Vale, and then south along Highway 201 from Adrian to the Idaho border. Except for the Vale area, onion fields in Malheur County are within seven (7) miles of the Snake River. Modifying the control area to better align with the production area could facilitate disposal of cull onions by providing disposal areas that are safely away from production areas, but still reasonably close for practical transportation to them.

Although adult onion flies are capable of flight, they do not appear likely to travel long distances. Research conducted in New York found that most flies travel less than 1 mile from their overwintering site². These findings have been incorporated into IPM recommendations in [New York](#), the [Great Lakes region](#), and [California](#) as a means to isolate current year onion fields from the previous year's fields or from cull piles. Even under the best case scenario, it would be unlikely for onion flies to travel as far as ten (10) miles³.

The number of onion flies that are able to emerge from cull piles is a function of the exposed surface area of piles⁴. Few eggs are laid deep within piles and few, if any, immatures can complete their development inside of cull piles. Covering piles completely with enough soil would be ideal to

prevent female flies from successfully laying eggs. However, emergence of flies from cull piles could also be reduced by allowing deeper burial pits to be used rather than scattering onion debris more shallowly.

We recognize the importance of managing the risks associated with nitrates entering groundwater. However, we would appreciate considerations for modifications to the 80 tons of onion debris per acre requirement. The nitrogen content of onion bulbs varies by cultivar and the amount of fertilizer applied. A conservative estimate of the nitrogen content of onion bulbs is 0.17% fresh weight⁵ or approximately 1.5 – 2.0% on a dry weight basis⁶. It should be noted that the widespread adoption of drip irrigation over the past two decades in Malheur County has allowed growers to dramatically reduce nitrogen fertilization of their onion crops and subsequent nitrogen load in bulbs.

A third part of the rule we would like to revise is Section F. Section F of the rule allows for culls that cannot be buried because of inclement weather to be treated with an EPA-approved insecticide. During the 2016-2017 shipping season, the ODA pesticide program identified several products for that purpose. Those products were the only ones with cull pile or non-crop areas listed as use sites on the label. There are more effective products that could be used if ODA could help identify the regulatory steps needed to allow those more effective products to be used^{7,8}.

We appreciate your consideration of this request and look forward to the opportunity to address any questions you may have. Please feel free to contact Stuart Reitz, Director of the Malheur Experiment Station, stuart.reitz@oregonstate.edu, regarding the science underlying our requests.

Sincerely,

Corey Maag
President

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- 3 Leitch, K. J., Ponce, F. V., Dickson, W. B., van Breugel, F. & Dickinson, M. H. The long-distance flight behavior of *Drosophila* supports an agent-based model for wind-assisted dispersal in insects. *Proc. Nat. Acad. Sci.* **118**, e2013342118, doi:doi:10.1073/pnas.2013342118 (2021).
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- 5 Geisseler, D., Ortiz, R. S. & Diaz, J. Nitrogen nutrition and fertilization of onions (*Allium cepa* L.)—A literature review. *Sci. Hortic.* **291**, 110591, doi:<https://doi.org/10.1016/j.scienta.2021.110591> (2022).
- 6 Brewster, J. L. *Onions and other vegetable alliums, 2nd Ed.*, (CABI, 2008).
- 7 Wilson, R. G., Orloff, S. B. & Taylor, A. G. Evaluation of insecticides and application methods to protect onions from onion maggot, *Delia antiqua*, and seedcorn maggot, *Delia platura*, damage. *Crop Prot.* **67**, 102-108, doi:<https://doi.org/10.1016/j.cropro.2014.10.002> (2015).
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<https://agsci.oregonstate.edu/article/evaluating-insecticide-seed-treatments-onion-manage-onion-maggot-and-seedcorn-maggot>