

**Senator Art Robinson**  
**STATE SENATOR**  
**DISTRICT 2**



**OREGON STATE SENATE**

May 5th, 2024

Ms. Laura Hartt  
Water Policy Analyst/Rules Coordinator, Policy Section  
Oregon Water Resources Department  
725 Summer St. N.E. Ste. A  
Salem, Oregon 97301

Dear Ms. Hartt,

I am writing to express my strong objection to new rules that will obviously make it extremely difficult for farmers to drill new agricultural wells.

I am a PhD scientist with extensive experience in statistics and computer modeling. Although, I am not an expert on ground water, it is obvious that the computer modeling – which is too complex to be completely understood – in combination with extreme cutoff criteria, can be used to stop the drilling of practically all agricultural wells in Oregon.

This concern is not misplaced. I have also been a farmer in Southern Oregon for 44 years. Claimed concerns over fish habitat have been used to stop the granting of new stream irrigation rights, destroy dams, and wreck havoc in our agricultural industry.

Oregonians need food. In a time of sharply rising food prices we should be doing everything we can to lower food prices, not raise them.

The fish are doing fine. Fluctuations in stream flow are extremely large due to variations in weather from day to day, month to month, and year to year. Fish don't swim where there isn't water. It does not take a scientist to realize that the remote possibility of a minor change in stream flow will not hurt the fish. Flawed computer models have caused problems in other areas of science as well.

Allocation of agricultural wells should be based on common sense, sound well documented science, and an effort to maximize agricultural production in Oregon. These new proposed rules will take us in the wrong direction.

Thank you for your attention in this matter.

Sincerely,

Senator Art Robinson  
Oregon State Senate, District 2

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