



February 26, 2025

House Committee on Agriculture, Land Use, Natural Resources, and Water  
Re: Concerns about HB 3106

Co-Chairs Helm and Owens, Vice-Chair Finger McDonald, and Committee Members:

The undersigned organizations represent various industries and water-related efforts within Oregon's natural resource sector, including a large proportion of the regulated community, which is impacted by state-level water data and associated policies. We would like to express our concerns with HB 3106 and DEQ's ongoing effort to create a statewide "water data portal" for use by state agencies and others. While we appreciate and support the idea of having a centralized portal for ease of access to Oregon's water data, we urge you to reconsider having DEQ host and implement this project. Instead, we would like to see this effort hosted and led by Oregon State University's [Institute for Water and Watersheds](#), the state's water resources research institute and one of 54 such centers in the U.S.

To date, several issues have impacted the success and momentum of this project. These include a lack of targeted investment and focus on where and how data will be housed and accessed both within and between agencies, lack of engagement and outreach with the broader natural resource industry and other key stakeholders, and a lack of expertise in analyzing, interpreting, and compiling water quality data of various types. The barriers to coordination and communication needed to carry out projects noted in the most recent [audit of DEQ](#) by Oregon's Secretary of State may also be impacting this project's slow progress.

More importantly, our organizations have experienced many instances where Oregon DEQ has misinterpreted, misrepresented, or ignored water data through its work on various water-related projects that our members have been involved with. In certain reports and decisions, the agency has used poor quality data and even data that has, by the agency's own standards, failed quality control. When concerns or even formal complaints have been made regarding these issues, those have also been ignored. This has understandably damaged our trust in the agency to be neutral, science-based, and accountable to its constituents and the state.

Given these issues, and the lack of accountability or peer/external review built into this project, and the lack of guidance on how it is intended to be coordinated between and used by agencies, we cannot continue to support this concept unless the lead institution is changed.

OSU's Institute for Water and Watersheds is one of 54 centers recognized and accredited by the US Geological Survey as part of the [National Institutes for Water Resources](#). It is an academic institution with the expertise and rigor to adhere to scientific best practices rather than cherry picking science that supports certain regulatory decisions. It can also convene a diverse group of stakeholders from a position of trust and neutrality. This is the most appropriate institution to house and lead coordination on the water data portal.

Thank you for the opportunity to express these concerns. With an institution change that prioritizes science, transparency, and trust, we would be glad to support this effort and investment.

Sincerely,

Oregonians for Food & Shelter  
Oregon Farm Bureau  
Oregon Association of Nurseries  
Oregon Business and Industry  
Oregon Dairy Farmers Association  
Oregon Seed Council  
Oregon Water Resources Congress  
Oregon Wheat Growers League  
Associated Oregon Hazelnut Industries  
Columbia Gorge Fruit Growers  
Northeast Oregon Water Association  
Water for Life