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Columbia County Board of Commissioners  
c/o Jacyn Normine  
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St. Helens, OR 97051  
Sent to: [jacyn.normine@columbiacountyor.gov](mailto:jacyn.normine@columbiacountyor.gov)

To the Columbia County Board of Commissioners:

Thank you for the opportunity to provide comments. We request that you hold the record open for no less than seven days after the close of the public hearing.

Columbia Riverkeeper does not support the County's proposal to limit application of the new Riparian Corridor Overlay Zone to apply only to fish-bearing lakes, rivers and streams and their respective riparian corridors (excluding application to non-fish bearing water bodies), and to allow the expansion of existing development within riparian corridors. Additionally, we object to the County's choice not to protect wetlands outside of riparian corridors, natural areas, or where required by city plan policies applicable to unincorporated land within urban growth boundaries. The changes could have drastic and unintended consequences for water quality, flood control, public resources, and private property near newly unprotected wetlands and riparian areas.

For instance, we are concerned about the impacts of these changes on drinking water and irrigation water. The staff report [acknowledges a study](#) that demonstrates how riparian vegetation reduces riverbank erosion, pollution, and turbidity in surface water and drinking water. Accordingly, the proposal to reduce protections for riparian vegetation will increase erosion, pollution, and turbidity across Columbia County. The County's analysis does not adequately assess the potential impact of the proposed changes on the quality and quantity of drinking water,

irrigation water, shallow water sources, and [water from wells](https://apps.wrd.state.or.us/apps/gw/wl_well_report_map/Default.aspx). (See the attached map from [https://apps.wrd.state.or.us/apps/gw/wl\\_well\\_report\\_map/Default.aspx](https://apps.wrd.state.or.us/apps/gw/wl_well_report_map/Default.aspx)). Relying on state and federal programs is not an adequate Goal 5 protection strategy for local resources.

At and near Port Westward, the proposed change could negatively impact the ability of the community to sustain resources that support agriculture, residences, fish, and wildlife. The County's analysis does not provide a clear picture of the consequences of the proposed changes, including potential impacts to the quality and quantity of water at Port Westward. Removing riparian and wetland protections in this area will have negative impacts for water quality, flood control, and irrigation as well as fish and wildlife habitat.

When pollution from poorly planned development enters local waterways, fish and farmers suffer in predictable ways. Sensitive crops such as blueberries or mint fail. Farmers lose organic certification. Sediment and turbidity in non-fish bearing streams enters fish-bearing streams, undermining region-wide efforts to recover and sustain salmon.

We agree with previous comments in email correspondence from ODFW highlighting the importance of non-fish bearing streams for water quality in nearby wetlands and fish-bearing streams. ODFW wrote,

...riparian zones are the dynamic interface between land and flowing water and an integral component to healthy fish and wildlife populations. Healthy riparian vegetation protects banks from erosion, influences in-channel aquatic habitats, maintains favorable water temperature for fish through shading, filters runoff, and provides nutrients to support terrestrial and aquatic life... ODFW understands the County is not proposing to retain the 25' riparian buffer for non-fish bearing streams, but it is important to acknowledge the critical functions and values that riparian habitats can provide for non-fish bearing streams, which includes serving as critical migration corridors for birds, amphibians, reptiles, mammals and other wildlife. **If the County is interested in pursuing the identification of significant non-fishing bearing streams through the standard ESEE process, ODFW can provide technical assistance in evaluating which non-fish bearing streams may be most significant for riparian buffers to protect wildlife habitat (e.g., migration corridors).**

Similarly, DSL wrote in response to ODFW's email,

Although these stream reaches may not support fish, they are known to be "food-producing areas for fish." These generally upstream/headwaters reaches contribute nutrients to the entire food web of downstream reaches as well as providing water quality inputs, like temperature buffering and cleaning overland flow before it enters the stream,

and water quantity inputs such as seeps, springs and wetlands. These are all water sources for, and affect the health of the downstream fish-bearing portions of streams. Maintaining healthy riparian corridors on non-fish bearing stream reaches can also protect stream adjacent wetlands and the habitat functions provided by the vegetation and aquatic resources within the riparian corridor.

By completely removing a 25' wide protection area along non-fish bearing streams, the proposal will leave portions of significant resource sites with no local protection. Additionally, Columbia County overstates the ability of Department of State Lands' (DSL) and US Army Corps of Engineers' (ACOE) authority to protect these areas. Non-fish bearing areas streams are not necessarily protected under state or federal rules. Under the County's proposal, there will be no mechanism to protect the functions of these areas for clean water and other resources.

We urge Columbia County to consider maintaining a 25' riparian corridor for non-fish bearing streams. Please consider accepting ODFW's offer to provide assistance to the County to evaluate which non-fish bearing streams may be most significant for riparian buffers.

Additionally, Columbia County should investigate further the possibility of identifying significant wetland resources in flood-prone areas and developing wetland inventories for areas in the County with sensitive natural resources. Protecting the quality of significant wetlands in Columbia County would improve the availability of wildlife habitat. Wetlands also act as areas for aquifer recharge and provide natural flood control by storing water. The proposal makes no effort to identify highly significant wetlands, conferring no protection for wetlands that do not trigger DSL or Army Corps of Engineers thresholds. Similar to ODFW, staff of the Oregon Department of Land Conservation and Development (DLCD) offered in August 2022 to provide technical assistance for the identification of particularly important wetlands, such as wetlands within a FEMA designated 1% annual chance flood zone and wetlands connected to a locally significant riparian area. The County should work with DLCD and take the opportunity to do more to protect wetlands.

Columbia County residents rely on resources and services provided by wetlands and non-fish bearing streams: clean water, drinking water, irrigation water, aquifer recharge, flood control, and productive fish and wildlife habitat. The proposed changes undermine these values. The findings are inadequate to evaluate impacts to farmers, fish, and residents throughout the County who depend on clean water and the benefits that wetlands and non-fish bearing riparian corridors provide for their homes and livelihoods.

Sincerely,

Dan Serres

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