CLATSKANIE
FARMER COLLECTIVE
locals growing locally

October 27, 2026

Columbia County Board of Commissioners

Re: PA 13-02 / ZC 13-01, Port Westward Remand Proceeding

Dear Commissioners,

Clatskanie Farmer Collective submits these comments regarding the Port of Columbia County's application to rezone approximately 837 acres at Port Westward from Primary Agriculture to Resource Industrial Planned Development.

Clatskanie Farmer Collective is a nonprofit organization working to strengthen the local agricultural economy in Columbia County and the Lower Columbia region. Through the Clatskanie Farmers Market and Clatskanie Food Hub, we work with more than 100 farmers and food producers and see firsthand how important viable agricultural land, water, infrastructure, and market access are to the future of farming in our region.

We understand that the issue currently before the County is narrower than the larger history of this rezone. The question is whether the industrial uses that could be allowed by this rezone are compatible with adjacent uses and surrounding natural resources and resource production practices, or whether they can be made compatible through appropriate mitigation.

We also understand that "compatible" does not mean that an industrial use can have no impact at all. The County does not need to know every detail of every future project today. But it must have enough information to understand the likely characteristics and reasonably foreseeable impacts of the uses it is authorizing, the vulnerabilities of surrounding farms and natural resources, and the measures necessary to make those uses compatible.

After reviewing the materials submitted on remand, we do not believe the current record demonstrates that the development authorized by this 837-acre rezone can be made compatible with surrounding agricultural uses, natural resources, and resource production practices.

The County's own review identifies important limits in the record.

County staff's Assessment of Uses distinguishes between lower-impact industrial uses that may be supportable under the current record and other uses for which staff found additional information would be necessary to demonstrate compatibility.

We understand that the current proposal and recommended conditions have moved away from some of the higher-impact examples considered earlier in this process.

But narrowing the types of industrial uses does not resolve the underlying compatibility questions.

The County still must determine whether the development authorized by this rezone, including the reasonably foreseeable physical changes associated with that development, can occur without creating incompatible impacts to surrounding farms, natural resources, and resource production practices.

The current record does not adequately demonstrate that.

Future permitting should not establish compatibility for the first time.

LUBA has directed the County to evaluate the likely characteristics of the industrial uses, the vulnerabilities of surrounding uses and natural resources, their likely adverse impacts, and the mitigation or conditions necessary to ensure compatibility.

Future development review can appropriately address these issues at a finer scale once a specific project, location, and design are known.

But the basic compatibility determination belongs in this proceeding.

The proposed conditions still leave important questions for later. For example, future development applications would be required to prepare an agricultural impact assessment describing neighboring agricultural operations, equipment, wind patterns, impacts, and proposed mitigation.

We support requiring that kind of agricultural analysis. But it should refine a compatibility determination that has already been supported by the record. It should not be the first time the County determines whether an industrial development can coexist with the agricultural operations surrounding it.

The same concern applies to future stormwater plans, wetland permits, hydrologic review, monitoring programs, and coordination with the Beaver Drainage Improvement Company.

Those processes may be appropriate for working out project-specific details. They should not substitute for demonstrating compatibility before the rezone is approved.

Water and drainage deserve particular attention.

Agriculture in this area does not operate parcel by parcel. Farms depend on an interconnected system of levees, pumps, drainage ditches, sloughs, groundwater, and irrigation.

That interconnectedness makes compatibility especially important.

LUBA previously identified unresolved concerns about the area's high water table and the potential for filling and grading associated with industrial development to alter hydrology and affect agricultural land vulnerable to flooding or dependent on well-drained soils.

LUBA also identified concerns about what could happen during a spill if contaminated water entered the same drainage and irrigation network serving agricultural land.

These are not simply water-quality questions. They are questions about how development on one property could affect the functioning of a larger agricultural system.

The proposed conditions include runoff controls and monitoring of water quality, water-table levels, and sloughs. Those are important protections.

But monitoring an impact is not the same as demonstrating beforehand that the development can be made compatible.

The County should have enough evidence now to understand the reasonably foreseeable effects of fill, grading, impervious surfaces, stormwater management, and industrial development on groundwater levels, drainage, irrigation, and neighboring farmland.

The current record still relies heavily on future review to determine what those effects will be and how they will be addressed.

There should also be clear, enforceable protections addressing what happens if industrial development changes drainage, groundwater levels, irrigation, or other parts of the shared system. Who is responsible? What thresholds trigger action? What corrective measures are required?

Those questions matter to the farmers whose ability to use their land depends on the system continuing to function.

Lower-intensity industrial uses still change the land.

Compatibility cannot be evaluated only by determining whether the most hazardous or intensive industrial uses are allowed.

Even lower-intensity industrial development requires physical changes to the landscape.

The proposal would change the zoning of approximately 837 acres of agricultural land to industrial use. Future development could include buildings, roads, paved and other impervious surfaces, fill, grading, utilities, stormwater infrastructure, and other permanent changes to the land.

The applicant's own stormwater analysis acknowledges that industrial development within the drainage basin could increase stormwater runoff because of increased impervious area.

The expansion area also contains significant mapped and unmapped wetlands and waters, and the applicant anticipates that development will likely result in wetland or water impacts requiring additional permitting and mitigation.

Those effects remain relevant even if the eventual industrial uses are considered lower intensity.

The County does not need to know the precise design of every future project. But it does need a sufficient basis to conclude that the reasonably foreseeable physical effects of industrial development across this area can be made compatible with surrounding agriculture.

We do not believe the current record provides that basis.

The effects of mitigation also need to be considered.

Wetland mitigation is particularly important in this location.

The applicant's materials anticipate that industrial development could trigger wetland mitigation and discuss the possibility of carrying out some of that mitigation within the leveed area itself.

Potential mitigation described in the record includes lowering land elevations, altering existing drainage canals, creating new flow channels, establishing wetland areas, and creating buffers.

Those measures may address one set of impacts, but they are also physical changes within the same interconnected hydrologic system that surrounding farms depend on.

The applicant itself acknowledges that wetland mitigation must be coordinated so that it does not negatively affect the hydrology of remaining agricultural lands.

The County should therefore evaluate not only the impacts of industrial development itself, but also the reasonably foreseeable impacts of the mitigation that development is expected to require.

The County does not need to know the exact location or design of every future wetland mitigation project today.

But the record should demonstrate that likely mitigation activities can be carried out within this shared drainage system without creating incompatible effects on surrounding agricultural land, and the County should identify the conditions necessary to ensure that result.

The cumulative effect is also important.

A single development or mitigation project may appear manageable on its own. Multiple projects, each adding impervious surface, altering drainage, affecting wetlands, or requiring mitigation within the same system, may have very different consequences.

That cumulative relationship should be addressed before the rezone is approved.

Mitigation needs to be tied to the actual vulnerabilities of this place.

The proposed conditions include agricultural buffers, dust controls, runoff requirements, water monitoring, spill planning, and future agricultural impact assessments.

Those are meaningful measures.

But the existence of mitigation measures does not by itself demonstrate compatibility.

The question is whether the record shows that those measures are sufficient for the development being authorized and for the specific vulnerabilities of the farms, water systems, and natural resources surrounding it.

Where the County relies on buffers, hydrologic protections, stormwater controls, monitoring, design restrictions, or other measures to make development compatible, those measures should be clearly supported by the record and incorporated into enforceable conditions.

Where the record does not establish that a use or reasonably foreseeable development impact can be made compatible, that uncertainty should not be resolved by approving the rezone and leaving the answer to a future permitting process.

Farmland is a finite resource.

We also believe this decision should be understood within the larger reality facing agriculture in Oregon.

Agricultural land is already disappearing. American Farmland Trust found that Oregon lost more than 65,000 acres of agricultural land to development between 2001 and 2016. USDA's most recent Census of Agriculture shows that the amount of land in farms in Oregon declined by another 4% between 2017 and 2022, while the number of farms declined by 6%.

For an organization whose work is centered on keeping farms viable and building markets for the people producing food in this region, those numbers matter.

Every acre of agricultural land does not have to remain unchanged forever. But converting agricultural land to industrial use is a long-term decision, and land that has been filled, graded, paved, developed, or incorporated into industrial infrastructure is extraordinarily difficult to return to agricultural production.

That broader reality makes it especially important that the County require a convincing demonstration of compatibility before approving the conversion of another 837 acres of agricultural land.

Agriculture is already here.

The farms surrounding the proposed rezone are part of a long-established agricultural landscape. Their drainage needs, soils, crops, water systems, equipment, transportation needs, and vulnerabilities are part of the existing conditions against which compatibility must be measured.

The Port is asking the County to authorize industrial development across approximately 837 acres of land within and adjacent to this agricultural system.

Even the lower-intensity industrial uses now under consideration could require substantial impervious surfaces, fill, grading, roads, stormwater infrastructure, wetland mitigation, and other permanent changes to the landscape.

The record acknowledges many of these impacts. It also relies heavily on future permitting, future agricultural impact assessments, future stormwater design, future wetland mitigation planning, and future coordination with the Beaver Drainage Improvement Company to determine exactly how those impacts will be managed.

Those future processes may be appropriate for refining the details of development that has already been shown to be compatible. They should not be relied upon to answer the fundamental compatibility questions that remain unresolved today.

This is especially important in an area where drainage, groundwater, irrigation, wetlands, and flood protection function as an interconnected system. Changes made to accommodate industrial development or to mitigate its impacts do not stop at a property line.

Clatskanie Farmer Collective does not believe the current record demonstrates that the development authorized by this 837-acre rezone can be made compatible with the surrounding agricultural uses, natural resources, and resource production practices as required by OAR 660-004-0020(2)(d).

We therefore ask the Columbia County Board of Commissioners to deny the requested Goal 3 exception and zone change.

If the County determines otherwise, we ask that it address directly in its findings the unresolved questions raised in this record regarding drainage, groundwater, impervious surfaces, filling and grading, stormwater, wetland impacts and mitigation, cumulative effects, and the effects of those changes on surrounding agricultural operations.

The burden should not fall on neighboring farmers or future permitting processes to determine after the rezone is approved whether these impacts can be successfully managed. The required compatibility determination belongs in this proceeding.

Agriculture in this area depends on systems that extend well beyond individual property lines. Before permanently changing the land-use framework governing these 837 acres, the County should be able to demonstrate, based on the record before it, that the surrounding agricultural landscape can continue to function alongside the development being authorized.

On the current record, we do not believe that showing has been made.

Thank you for considering our comments and for carefully reviewing the extensive record in this proceeding.

Sincerely,

Jasmine Lillich
Executive Director
Clatskanie Farmer Collective