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November 3, 2026
Columbia County
Board of Commissioners Office

Columbia Soil & Water Conservation District

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10 October 2026

Dear Columbia County Board of Commissioners,

The Columbia Soil and Water Conservation District (SWCD) opposes the Port of Columbia County's (Port) effort to rezone 837 acres of high-value farmland at Port Westward for industrial development.

Our mission at Columbia SWCD is to inspire and assist the people of Columbia County in voluntarily stewarding our soil, water, habitat, and other natural resources. We envision a Columbia County where people have the knowledge and tools to care for our shared natural resources; a Columbia County where water is clean and abundant, soils are healthy and productive, locally grown food is abundant, and ecosystems thrive; and where we all recognize the interconnection of people and our natural world.

The proposed rezoning raises significant concerns regarding the protection of agricultural land, wetland function, watershed health, and the safety and livelihoods of the surrounding community. These concerns are directly related to the District's mission and are outlined below.

1. **Loss of Prime and Unique Farmland**
   The proposed rezoning would remove 837 acres of agricultural land from potential agricultural use, including federally designated Farmland of Statewide Importance, Farmland of Unique Importance, and Prime Farmland if Drained. The Oregon Land Use Board of Appeals (LUBA) has repeatedly found that the Port and the County have not provided sufficient evidence to demonstrate that rezoning this land is compatible with Oregon's farmland protection requirements under ORS 197.732(2)(c)(D) and OAR 660-004-0020(2)(d).

   These high-value agricultural soils are an irreplaceable resource. Permanently converting 837 acres of farmland to industrial use would threaten local food security and long-term economic stability, particularly given the limited agricultural land available in Columbia County. The loss of this land would have lasting consequences for the region's agricultural capacity and its ability to support local food production.

2. **Loss of Wetland Function**
   Nearly half of the 837 acres included in the rezoning proposal is estimated to contain significant wetland areas. These wetlands provide important hydrologic and ecological functions likely to be reduced or lost through industrial development. The *Columbia County Port Westward Goal 3 Exception Remand Staff Report* (*LUBA Staff Report*) identifies recurring failure to provide expert analysis of potential adverse impacts to natural resources from proposed industrial activities.

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Similarly, the Draft Environmental Impact Statement (DEIS) for the proposed biodiesel refinery on approximately 500 acres of the proposed development area identifies substantial concerns regarding wetland impacts. The U.S. Army Corps of Engineers concluded that the development would have major cumulative impacts on wetlands, resulting in "long-term loss of wetland function, hydrologic fragmentation, and diminished habitat capacity." The DEIS further notes that, although compensatory mitigation would offset some impacts, residual watershed-scale impacts would remain. These findings underscore the importance of fully evaluating wetland functions and cumulative impacts before proceeding with rezoning. Mitigation alone may not adequately compensate for the loss of these interconnected natural systems.

3. **Cumulative Watershed Impacts**
   The *LUBA Staff Report* also highlights deficiencies in addressing the vulnerabilities of surrounding farms, forests, and natural resources to industrial development. Filling wetlands, increasing impervious surfaces, and altering stormwater runoff can change hydrology and historical drainage patterns. These changes may have cascading effects on agricultural drainage infrastructure, downstream water quality, and the health of the broader watershed.

   The surrounding watershed, including the Columbia River, supports critical habitat for thirteen Evolutionarily Significant Units and Distinct Population Segments of salmon and steelhead listed under the federal Endangered Species Act. The Columbia River Inter-Tribal Fish Commission has provided expert testimony that industrial development at the scale intended by the rezoning would negatively affect juvenile salmon and other aquatic species.

   Furthermore, millions of dollars in public funds have been invested in local restoration and water-quality improvements. These efforts include extensive tidal reconnection and wetland rehabilitation at Batwater Station, a mile from the rezoning area, completed by the District and the Lower Columbia River Watershed Council in 2017. Industrial development that compromises these restoration investments could undermine years of conservation work and jeopardize future improvements in watershed health.

4. **Risk to Floodplain and Agricultural Operations**
   Filling wetlands and altering hydrology may also raise groundwater levels on surrounding farmland, increasing the risk of flooding, levee failure, and significant crop losses. The *LUBA Staff Report* identifies recurring deficiencies in evaluating how the proposed development could affect the interconnected network of drainage canals and irrigation water infrastructure managed by the Beaver Drainage Improvement Company (BDIC). BDIC has stated that its existing drainage infrastructure is not equipped to accommodate a large industrial development at Port Westward. Without a comprehensive assessment of these risks, industrial

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development could place neighboring agricultural operations, essential drainage infrastructure, and the livelihoods of local farmers at risk.

We urge the Port and the Board of Commissioners to pause efforts on the rezoning at Port Westward until the potential impacts have been adequately evaluated and the following measures are addressed:

1. **An independent hydrological and floodplain analysis,** including review by qualified third-party experts, to assess development impacts on drainage systems and adjacent lands.

2. **No net loss of prime farmland**, including the development of a compensatory mitigation framework that preserves or enhances equivalent agricultural land within Columbia County.

3. **Wetland mitigation located outside of the Beaver Drainage District** at a sufficient ratio to ensure full functional replacement, within the same watershed, and subject to long-term monitoring and enforcement.

4. **A long-term monitoring and compliance framework** to ensure that wetland mitigation measures are maintained and effective over time.

The rezoning process has repeatedly raised unresolved concerns about whether industrial development at the proposed scale can proceed without placing surrounding communities, agricultural operations, and natural resources at risk. The continued lack of sufficient evidence demonstrating compatibility with ORS 197.732(2)(c)(D) and OAR 660-004-0020(2)(d) shows the current proposal is not consistent with Oregon's farmland protection requirements and Statewide Planning Goals.

Healthy soils, clean water, functioning wetlands, and productive farmland are finite resources essential to the well-being of our community. Their protection is inseparable from the long-term health of our local economy, the resilience of our agricultural systems, and the safety and livelihoods of the people who depend on them. The Columbia SWCD urges the Port and the Board of Commissioners to prioritize these public interests, fully evaluate the potential cumulative impacts, and protect the natural resources that sustain Columbia County. Thank you for the opportunity to provide comment.

Sincerely,

Taylor Murray, Executive Director,
Columbia Soil and Water Conservation District

Michael Calhoun, Board President,
Columbia Soil and Water Conservation District for the Board of Directors

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