OREGON AGRICULTURAL TRUST

November 4, 2026

RE: Port Westward Expansion (PA 13-02 / ZC 13-01)

Dear Columbia County Board of Commissioners,

My name is Tara Olson, and I am submitting this comment on behalf of the Oregon Agricultural Trust (OAT). I strongly urge the Board to deny the proposed Port Westward expansion.

I am Associate Director of Land Programs at Oregon Agricultural Trust, where my work consists of supporting farmers and ranchers along the Oregon coast and in the Lower Columbia region to protect the state's world-class agricultural lands, and the natural and agricultural resources that sustain Oregon's economies and communities. Through my work with farmers in the Beaver Drainage District, I understand that the industrial uses that an expansion of Port Westward would authorize are fundamentally incompatible with the region's agricultural economy and community, water management systems, and the natural resources that characterize the Beaver Drainage District.

The Beaver Drainage District was identified as a priority for OAT in our five-year Farm and Ranch Protection Plan because of its importance to the region's agricultural production capacity. It includes some of northwest Oregon's most productive, resilient, and versatile farmland, as identified by the American Farmland Trust's *Farms Under Threat* report (source: https://farmlandinfo.org/publications/farms-under-threat-2040/). These farms also protect important wildlife migration corridors and habitat, including for many bird species traveling along the Pacific Flyway. The proposed industrial uses threaten these agricultural and natural resources.

The planned expansion conflicts with Oregon's land use laws that protect farmland. The proposed expansion of Port Westward would directly impact at least 47 acres of farmland through conversion to industrial use. In addition, the mitigation required to compensate for loss of 100 acres of wetlands, will permanently convert a site designated for CWM, consisting of 466.10 acres of land zoned by the county as Exclusive Farm Use. The DEIS explicitly stated that this land is "predominantly Farmland of Unique Importance and Prime farmland if drained" (pg. 3-115), which means that the community of Clatskanie would be losing nearly 500 acres of farmland. Even small amounts of

farmland loss have significant economic and cultural impact on small agricultural communities, like that of Clatskanie, Oregon, where the loss of farms and farmland has ripple effects on many local businesses that support the agricultural economy.

In addition to the immediate loss of nearly 500 acres of farmland, the proposed expansion threatens the function of all agricultural operations within the area. The Beaver Drainage District is an interconnected working landscape. This area's agricultural productivity depends on a coordinated system of levees, drainage infrastructure, ditches, pumps, and water management practices. These systems do not operate according to individual property boundaries. Water moves across the landscape, and changes to one part of the system can affect agricultural properties and natural resources elsewhere in the District. One of OAT's most significant concerns is the relationship between industrial development and the function of the drainage and irrigation infrastructure that sustains agriculture throughout the Beaver Drainage District.

Industrial development that changes drainage patterns, increases impervious surfaces, alters water flows, or introduces contaminants into the district's drainage network can affect farms well beyond the development site. The County must account for how the proposed industrial uses will interact with the existing drainage system under normal operating conditions, during heavy rainfall and flooding, and in the event of equipment failures, spills, or other emergencies.

The Beaver Drainage Improvement Company, which manages drainage in the area, has been clear — along with local farmers and water quality advocates — that the likelihood of contamination from stormwater runoff during construction and operation of the facility, including the rail yard, could have major impacts. Regular flooding and the interconnectedness of the drainage district's ditches mean that stormwater at the facility cannot be assumed to be fully contained. In the event of spills, large or small, from feedstock or finished product, pollutants could move through the water system and put local farms, wetlands, and aquatic habitat in danger. Spill risk and stormwater runoff are amplified by the extensive rail facility NEXT proposes. These are not moderate or temporary impacts, but would irreversibly impact the area's farmland and natural resources.

OAT also has concerns with how this project would impact properties with conservation easements in this region. OAT has been awarded both federal and state funding to protect nearly 500 acres of working farmland in the Beaver Drainage District in perpetuity. These farms provide significant wildlife habitat and help maintain wildlife migration corridors, as identified in their grant awards from the Oregon Watershed Enhancement

Board. The agricultural and ecological values of the Beaver Drainage District are recognized beyond the immediate farming community, as demonstrated by this significant investment of public funds.

This project is simply incompatible with local farming operations in the region and would be in direct conflict with public interest, especially since recent polling shows that 80% of Oregonians believe that preserving working farmland is extremely or very important. (source: https://oregoncf.org/assets/PDFs-and-Docs/PDFs/Oregon-Views-of-Conservation-Issues-Survey-Results.pdf)

Despite the mitigation measures that have been proposed alongside the expansion, the bottom line is that the Beaver Drainage District would lose both farmland and the habitat benefits associated with the stewardship of that farmland — not just from the acreage that the refinery is constructed on, but from the impacts of changing water management within the levee area. At the end of the day, the proposed industrial uses are not compatible with the agricultural and natural resources within the Beaver Drainage District, and no amount of mitigation could offset the impacts of moving this project forward.

The NEXT project threatens the existing local economy and the wildlife habitat that this region's unique farmland supports. I urge the Board of Commissioners to take these incompatibilities into account and deny the proposed Port Westward expansion.

Thank you for your careful consideration,



Tara Olson
Land Program Associate Director, Coast
Oregon Agricultural Trust