Outlook

Re: BDIC comments for County Remand Proceedings regarding Port Westward

From Truett C. Stolzenburg <tstolzenburg@hotmail.com>
Date Fri 11/6/2026 1:45 PM
To Jacyn Normine <Jacyn.Normine@columbiacountyor.gov>
Cc Warren Seely <seelymint@outlook.com>; Tim Keranen <bradburyfarms75@gmail.com>; Angela Velke <ajvelke@yahoo.com>

Hello Jacyn,

I am attempting to send this email again without the attachment. The comments will be pasted as text in this email below.

Again, please confirm receipt of these comments.

Thank you,

Truett Stolzenburg
Director, BDIC

Beaver Drainage Improvement Corporation Statement

Regarding the Proposed 837-Acre Port Westward Industrial Rezoning

Columbia County Remand Proceedings | PA 13-02 and ZC 13-01

November 6, 2026 | Authorized by the BDIC Board of Directors

Introduction

The Beaver Drainage Improvement Corporation (BDIC) recognizes the importance of industrial development to Columbia County and the surrounding communities. BDIC welcomes industrial partners whose operations are compatible with the district's drainage infrastructure, flood protection responsibilities, and agricultural land uses.

Our concern is not industrial development itself, but the potential consequences of compensatory wetland mitigation associated with industrial development within the Beaver Drainage District.

Industrial facilities may be compatible with the district's infrastructure and surrounding agricultural operations. However, wetland mitigation involving excavation, altered hydrology, and permanent land-use restrictions can present fundamentally different challenges.

The compatibility of industrial development with agriculture should not automatically establish the compatibility of its associated wetland mitigation with surrounding agricultural operations.

1. Compatibility With the District's Purpose

BDIC was established to drain, reclaim, and protect agricultural lands within the Columbia River floodplain. Its levees, drainage ditches, pumping facilities, and related infrastructure form an interconnected system that supports productive agriculture while protecting homes, businesses, and industrial facilities.

The proposed rezoning encompasses approximately 837 acres within BDIC's approximately 5,717-acre district, representing about 14.6% of its total area.

BDIC is concerned that the cumulative effects of industrial development and associated compensatory wetland mitigation could substantially reduce the agricultural land base that the district was established to serve.

2. Levee Safety and Drainage Infrastructure

BDIC's concerns are supported by previous experience at the Hermo Road Mitigation Site.

During its 2016 inspection of the district's levee system, the U.S. Army Corps of Engineers documented seepage damage associated with excavation at the Hermo Road mitigation site.

This experience illustrates how wetland mitigation activities, even when separately permitted, can adversely affect critical flood protection infrastructure.

Because BDIC's drainage and levee systems are interconnected, adverse effects from mitigation activities may extend beyond the mitigation property and affect neighboring farms and other properties.

BDIC is particularly concerned about potential impacts on levee integrity, inspection and certification requirements, drainage performance, maintenance access, and the district's ability to fulfill its responsibilities.

3. Potential Cumulative Loss of Agricultural Land

The proposed rezoning of 837 acres raises an important question about the total amount of agricultural land that could ultimately be affected by industrial development and its associated compensatory wetland mitigation.

For illustration, assume all 837 acres are developed and require four acres of mitigation per acre developed. That scenario would result in approximately 3,348 additional acres of mitigation and a combined footprint of approximately 4,185 acres. If all of that acreage were within the Beaver Drainage District, it would represent about 73% of the district’s 5,717 acres. This scenario does not include other industrial projects or mitigation already proposed or underway within the district.

These figures are illustrative and do not represent a confirmed mitigation requirement. Actual mitigation obligations would depend on the extent of regulated wetland impacts, the nature of future industrial development, and the availability and location of approved mitigation alternatives.

Importantly, the agricultural consequences of compensatory wetland mitigation are not necessarily limited to reduced productivity or temporary impacts. Where productive farmland is converted to permanent wetland mitigation under perpetual conservation restrictions, that land is effectively removed from conventional agricultural production indefinitely. Such conversion represents a long-term loss of agricultural land, not merely a change in farming practices or a temporary disruption.

Furthermore, the impacts may extend beyond the acreage directly converted. Changes in hydrology, drainage patterns, vegetation, and wildlife habitat could adversely affect neighboring agricultural properties that remain in production, as well as the district's interconnected drainage and flood protection infrastructure.

BDIC requests that Columbia County evaluate the reasonably foreseeable mitigation needs associated with the proposed industrial uses, including the potential permanent conversion of productive agricultural land. The County should determine whether those needs can be satisfied without removing additional farmland within the district from agricultural production and consider the cumulative consequences for neighboring farms, drainage infrastructure, levee protection, and the district's long-term viability.

4. Agricultural and Economic Impacts

The permanent conversion of productive agricultural land to industrial or mitigation uses could eliminate opportunities for agricultural production, employment, and related economic activity.

Commercial blueberry production within the district provides one example of the substantial agricultural value these lands can support.

The loss of productive acreage may also affect neighboring farms through changes in drainage conditions, water management, and the availability of land needed to maintain economically viable agricultural operations.

BDIC believes the County should evaluate these potential long-term economic consequences, rather than considering only the acreage directly occupied by industrial facilities.

5. Invasive Species, Wildlife, and Agricultural Pest Management

BDIC is concerned about the long-term management of permanent wetland mitigation areas located near productive farmland.

Changes in vegetation and habitat may create conditions favorable to invasive plants, agricultural insect pests, or wildlife populations that could adversely affect surrounding crops.

Because mitigation lands may be subject to perpetual conservation restrictions, BDIC requests clarification regarding the authority and responsibility to manage these potential impacts.

Mitigation management plans should provide adequate long-term monitoring, invasive species control, agricultural pest management, funding, and corrective action.

These responsibilities should remain effective beyond the initial regulatory monitoring period. Neighboring agricultural landowners should not be left responsible for controlling adverse conditions originating from mitigation properties.

6. Potential Acquisition of Agricultural Land for Mitigation

BDIC also requests clarification regarding the potential acquisition of additional agricultural land for compensatory wetland mitigation associated with future industrial development.

Under ORS 777.116, Oregon port districts possess statutory authority to acquire property through condemnation, subject to applicable legal limitations.

BDIC recognizes that this authority does not establish that the Port of Columbia County intends to use eminent domain for wetland mitigation, nor does it necessarily authorize condemnation for that particular purpose.

Nevertheless, given the substantial acreage that could potentially be required for compensatory mitigation, BDIC believes it is important to understand whether future mitigation lands would be acquired exclusively through voluntary transactions or whether the Port anticipates any use of its condemnation authority.

BDIC respectfully requests that the Port and County clarify whether eminent domain is contemplated as a means of acquiring agricultural land or property interests for mitigation associated with development of the proposed 837-acre industrial area.

7. Compatibility Under Oregon Land-Use Rules

Under OAR 660-004-0020(2)(d), Columbia County must address the compatibility of proposed uses with adjacent land uses and surrounding resource management and production practices.

BDIC believes that reasonably foreseeable impacts associated with compensatory wetland mitigation should be considered where those impacts could affect neighboring agricultural operations or the district's shared drainage and flood protection infrastructure.

The district also requests consideration of relevant long-term economic and resource consequences under OAR 660-004-0020(2)(c), to the extent permitted by the scope of the remand proceedings.

BDIC's experience at Hermo Road demonstrates why mitigation-related impacts deserve consideration rather than being assumed compatible merely because the associated industrial facility may be compatible.

8. Levee Certification

BDIC has not yet achieved the standards required by the U.S. Army Corps of Engineers and FEMA to obtain levee certification, due in part to previous mitigation projects within the district. BDIC is concerned that development and associated mitigation under the proposed rezoning could further affect its ability to achieve levee certification.

9. BDIC's Position and Requested Action

BDIC supports responsible industrial development that can coexist with the district's agricultural operations and flood protection responsibilities.

However, BDIC cannot support the proposed 837-acre industrial rezoning without adequate evidence that reasonably foreseeable industrial development and associated mitigation can occur

without compromising levee integrity, drainage operations, or the continued viability of surrounding agricultural uses.

BDIC respectfully requests that Columbia County:

1. Evaluate the reasonably foreseeable compensatory wetland mitigation needs associated with future industrial development of the proposed 837 acres, including the potential permanent conversion of additional productive agricultural land.
2. Determine whether mitigation can be located outside the Beaver Drainage District or accomplished through other approved methods that avoid conflicts with agricultural production and flood protection infrastructure.
3. Evaluate potential impacts on levee integrity, drainage operations, maintenance access, and neighboring agricultural properties, supported by appropriate engineering and hydrological evidence.
4. Address long-term invasive species, agricultural pest, and wildlife management responsibilities, including enforceable maintenance and funding provisions.
5. Clarify whether the Port anticipates using eminent domain authority to acquire agricultural land or property interests for compensatory wetland mitigation.
6. Consider the cumulative consequences of industrial development and associated mitigation for the district's agricultural land base, economic viability, and continued ability to fulfill its statutory responsibilities.

Where protective measures are proposed, BDIC requests that they be supported by appropriate evidence and made enforceable through applicable approval conditions.

BDIC's concern is not opposition to industry. It is the protection of the agricultural lands, drainage infrastructure, and flood protection system that the district was established to serve.

Submitted upon authorization of the Beaver Drainage Improvement Corporation Board of Directors.

From: Truett C. Stolzenburg <tstolzenburg@hotmail.com>
Sent: Friday, November 6, 2026 1:41 PM
To: iacyn.normine@columbiacountyor.qov <iacyn.normine@columbiacountyor.qov>; Jacyn.Normine@columbiacountyor.gov <Jacyn.Normine@columbiacountyor.gov>
Cc: Warren Seely <seelymint@outlook.com>; Tim Keranen <bradburyfarms75@gmail.com>; Angela Velke <ajvelke@yahoo.com>
Subject: Re: BDIC comments for County Remand Proceedings regarding Port Westward

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