

September 25, 2026

Columbia County Board of Commissioners

230 Strand Street
St. Helens, OR 97051

Re: Public Comment Opposing the Proposed 837-Acre Agricultural Rezone at Port Westward

Commissioners,

I am writing with evidence-based and scientific focus to urge the Columbia County Board of Commissioners to deny the Port of Columbia County's fourth attempt to rezone 837 acres of high-value agricultural land at Port Westward from Agricultural Protection (Exclusive Farm Use - EFU) to Industrial.

Over the past decade, the Land Use Board of Appeals (LUBA) has repeatedly affirmed that high-value farmland in the Columbia River Estuary warrants strict statutory protections under Oregon's land use planning framework (specifically Statewide Planning Goal 3) [1, 2].

Converting these high-yield agricultural lands to heavy industrial designations introduces significant, unmitigable risks to soil dynamics, hydrogeology, and the biological integrity of the lower Columbia River ecosystem.

1. Geotechnical Instability and Floodplain Dynamics

The land surrounding Port Westward consists primarily of deep, unconsolidated alluvial soils, saturated silt, and peat, historically reclaimed from floodplains and protected by a complex system of dikes, levees, and drainage ditches [3, 4]. These saturated, unconsolidated soils exhibit high liquefaction susceptibility during seismic events associated with the Cascadia Subduction Zone [5]. Heavy industrial infrastructure—such as liquid bulk fuel storage tanks, processing facilities, and heavy rail loads—exerts immense static and dynamic loads. Earthwork, deep foundation piling, or structural settling in this setting risks damaging the surrounding drainage infrastructure and compromise nearby dike integrity, increasing flood risks for adjacent agricultural operations [4, 6].

2. Estuarine Ecological Impacts and Water Quality

Port Westward lies within the lower Columbia River Estuary, a critical habitat for multiple threatened and endangered salmonid species listed under the Endangered Species Act (ESA), including Lower Columbia River Chinook, Coho, and Steelhead [7, 8]. The estuary serves as an essential transition zone for juvenile salmon smolts acclimating to marine conditions [8].

Permitting heavy industrial activity—including liquid fuel production, processing, or transport—**presents a persistent threat of chronic toxic runoff and catastrophic spill events** [9]. Hydrocarbon exposure, even at micro-concentrations (parts per billion), degrades salmonid olfactory function, severely impairing homing ability, predator avoidance, and foraging efficiency [10, 11]. Furthermore, localized industrial discharge into contiguous diked wetlands threatens thermal regimes and dissolved oxygen levels necessary for estuarine fauna [9, 12].

3. Cumulative Industrial Risk and Developer Track Record

Sound environmental planning requires evaluating the cumulative impacts of adjacent industrial proposals, including the major non-conventional diesel refinery and railyard proposed by NEXT Energy (NXTClean Fuels) [2, 12]. Industrial facilities of this scale require significant natural gas inputs for hydrogen production, releasing substantial greenhouse gas emissions and volatile organic compounds (VOCs) that **degrade local air quality** [13, 14].

Moreover, **proposals involving high-capital, high-risk industrial energy infrastructure carry serious performance uncertainties**. Recent business withdrawals—such as NEXT backing out of its three-year-old biofuel initiative in Lakeview, Oregon—highlight the **speculative nature of such developments** [15]. Sacrificing fertile, resilient agricultural land for high-risk industrial ventures potentially exposes the County to long-term site remediation burdens and ecological liabilities [1, 16].

The 837 acres at Port Westward represent irreplaceable prime farmland integrated within a sensitive aquatic ecosystem [1, 3]. **Paving over 837 acres of prime farmland for heavy industry at Port Westward threatens our agricultural economy, compromises fragile flood levees on unstable soil, and places the Columbia River Estuary at risk of catastrophic fuel spills**. Converting this protected farmland into an industrial zone endangers endangered salmon, imperils neighboring family farms, and sacrifices Oregon's most fertile, irreplaceable estuarine land for high-risk industrial ventures. Heavy industrial zoning in an area characterized by unstable soils, contiguous wetlands, and critical salmon habitat presents unacceptable environmental risks [4, 8]. I **strongly urge the Commission to uphold Oregon's land use laws, protect Columbia County's agricultural economy, and deny the proposed rezone**.

Respectfully,

A handwritten signature in blue ink that reads "Albert LePage" followed by a small circular symbol.

Albert LePage, M.Ed. Science, B.S. Biology
Member, *Society for Conservation Biology*

Disclosure: Generative AI was used in the drafting of this comment letter; however, the submitter has reviewed, edited, and verified the accuracy of all information and assumes full responsibility for its content.

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