

From: [N Whitcombe](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: LU 24 027 HOUSING
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Attachments: [HOUSING.pdf](#)

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Please see attached paper on HOUSING

Thank you

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N J Whitcombe

**WHITE PAPER ON HOUSING – FEWER HOUSING UNITS FOR BENTON COUNTY & ADAIR
BCC CUP CRITERIA: 53.215(1) – MAKE “IMPOSSIBLE” AND/OR SERIOUSLY INTERFERE WITH
USES ON ADJACENT PROPERTY**

DO NORTH BENTON COUNTY & ADAIR NEED MORE **LANDFILL? OR DOES NORTH BENTON
COUNTY & ADAIR NEED MORE **HOUSING**?**

YOU DON'T GET BOTH

LANDFILL ON THE “EXPANSION” PARCEL WILL **SERIOUSLY INTERFERE WITH OR MAKE
“IMPOSSIBLE” HOUSING** ON ADJACENT AND NEARBY PARCELS ZONED FOR THAT USE.

THE WAY A COUNTY GETS **MORE HOUSING** IS FOR DEVELOPERS TO DECIDE THEY CAN **MAKE
MONEY** BY BUILDING HOMES. THEY WON'T BUILD HOUSES IF THEY CAN'T SELL THEM FOR A
PREMIUM. **HOMES NEAR A LANDFILL DO NOT COMMAND A PREMIUM.**

THERE IS A SIGNIFICANT AMOUNT OF UNDERUTILIZED LAND ZONED FOR HOUSING NEAR THE
LANDFILL. **IF THE LANDFILL IS EXPANDED, THIS LAND WILL NOT BE DEVELOPED FOR HOUSING.**

THE LANDFILL IMPAIRS HOUSING IN A VARIETY OF WAYS

- **170 ACRES:** **SUBJECT OF ORAL TESTIMONY**
ADJACENT TO THE PROPOSED EXPANSION TO EAST AND SOUTH
ZONED RR-10, UNSUBDIVIDED, UNBUILT
PROPOSAL RENDERS FUTURE DEVELOPMENT IMPOSSIBLE
- **1 PARCEL:** **SUBJECT OF ORAL TESTIMONY**
ADJACENT TO THE PROPOSED EXPANSION TO THE WEST
PHILLIPS PROPERTY
PROPOSAL WILL RENDER CONTINUED RESIDENTIAL USE IMPOSSIBLE
- **450 ACRES+/-:** **DEMOLISHED HOMES** OVER THE PAST 50 YEARS, THE LANDFILL
OPERATOR'S POLICY HAS BEEN TO PURCHASE ABUTTING PROPERTIES AND DEMOLISH
THE HOMES THAT WERE SITED ON THEM. SOME OF THESE HOMES MIGHT BE REBUILT
POST CLOSURE IF THIS EXPANSION IS DENIED.
- **NORTH ADAIR:** **ADAIR UGB** WILL NOT EXPAND NORTH IF EXPANSION IS NOT DENIED.
- **18,095 ACRES:** A CIRCLE WITH A THREE-MILE RADIUS ENCOMPASSES **18,095
ACRES**. PER ACADEMIC RESEARCH SUBMITTED, THAT IS THE EXTENT OF THE CHILLING
EFFECT ON HOUSING CAUSED BY THE LANDFILL. IF THIS EXPANSION IS NOT DENIED, THE
CHILLING EFFECT WILL IMPACT ADDITIONAL HOUSING IN BENTON COUNTY

SUMMARY

Both Benton County and the landfill operator have recognized that the landfill is incompatible with non-landfill land useⁱ. When one land use is incompatible with a nearby use, the less intensive use can be impaired by the more intensive use. In the worst caseⁱ, the less intensive use may be abandoned. That is what has historically happened with the landfill. It has in fact been the landfill operator's written policy, articulated in a document submitted to DEQ.ⁱⁱ

The 59-acres is “buffer” between active landfilling operations and abutting properties. If this acreage becomes landfill, it is no longer a buffer, and the properties on Tampico Ridge to the east, west, and south will never be developed for homesites to their potential as zoning allows. Furthermore, Adair Village will continue to be constrained in northward growth.

ⁱ Benton County Policy

As reference in the 1980 Benton County Comprehensive plan, on April 4, 1978, the Planning Commission adopted the following policy:

*d. The land area adjacent to the southeastern and southwestern parts of Coffin Butte should be considered **inappropriate for residential use**.*

ⁱⁱ Prepared for Valley Landfills, Inc, September 23, 2003

Tuppan Consultants, LLC

Focused Risk Assessment and Feasibility Study,

Coffin Butte Landfill, Benton County, Oregon

6.3.5 Property Purchase

*Property purchase near the landfill is an effective means of preventing groundwater use and minimizing **land uses not compatible with landfill operations**. As property adjacent to the landfill property comes on the market, VLI will pursue negotiations with the owners to buy the property. **Properties of current interest to the VLI include the Phillips property south of the landfill...***

NOTE THAT HEREIN, APPLICANT'S CONSULTANTS DEFINE "ADJACENT" TO MEAN "NEAR"

THE APPLICANT'S STATED 23-YEAR-OLD PLAN TO EVENTUALLY PURCHASE THE PHILLIPS' PROPERTY DOES NOT PERMIT THE APPLICANT TO ACCELERATE THE PROCESS OF ACQUIRING THIS PROPERTY BY INCREASING THE EXISTING PAIN THE LANDFILL IS INFLECTING ON THIS ELDERLY COUPLE.

THE APPLICANT'S EXPERTS WHO HAVE WEIGHED IN ON ODORS, NOISE, AND VISUAL BLIGHT TO OPINE THAT THIS PROPOSAL WILL HAVE NO IMPACT ON THE PHILLIPS PEACEFUL ENJOYMENT OF THE PROPERTY THEY HAVE LIVED IN FOR FIFTY YEARS SHOULD BE ASHAMED OF THEMSELVES.

WHITCOMBE BRIEF STATEMENT OF QUALIFICATIONS

(CV including publications & awards available on request)

Nancy Whitcombe is qualified to evaluate issues involving real estate, real estate development, public finance, land use, and urban planning. She has experience soliciting and assessing documentation produced in the entitlement process. For decades, she has been involved in the land use process, both as a Planning Commissioner and as an applicant for land use entitlements.

She obtained her BA in Architecture from Princeton University and her Master's Degree in Architecture and in Environmental Design with an Urban Planning concentration from the Architectural Association in London and the University of California at Berkeley. In 2014, she finished an accounting certification program at Austin Community College in Austin Texas. She was licensed as an architect in 1989, and as a registered LEED Green Building Professional by the US Green Building Council in 2009.

Since 2004 she has managed family-owned real estate holdings and has worked as an accounting professional specializing in issues involving real estate, estates, and trusts. From 1994 through 2004 she served as a Planning Commissioner in Colorado. Prior to that, as a partner in David Baker + Associates, she worked with developers to design, obtain entitlements for, and build thousands of affordable and market rate housing units in the Bay Area.