

**From:** [N Whitcombe](#)  
**To:** [Benton Public Comment](#)  
**Subject:** LU 24-027 Attached please find copies of materials presented at the 5/8/2025 hearing  
**Date:** Friday, May 16, 2025 10:25:20 AM  
**Attachments:** [05162025CO WHITCOMBE ORAL TESTIMONY HEARING 05082025.pdf](#)

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Thank you very much.

--

N J Whitcombe

NANCY WHITCOMBE, TESTIMONY  
EXPERTISE: LAND USE & REAL ESTATE IMPACTS

BACKGROUND, See page 11 for details:

I am a retired architect. I was a planning commissioner for a decade.

INCREASE IN IMPACTS OVER CURRENT AMOUNTS

The applicant's consultants' studies presented are based on current impacts continuing unchanged. But impacts will increase, by the following amounts (this does not count enormous site preparation impacts):

- 120% -- Waste-in-place
- 135% -- Surface Area (this does not capture actual surface area increase)
- 168% -- Yearly/Daily waste volume increase

**IN MY OPINION, THE APPLICANT'S CONSULTANTS' STUDIES ARE FLAWED**

SIGNIFICANTLY ADVERSE LAND USE IMPACTS, see page 6 for full-size image:

Even if you accept the applicants' hypotheses, impacts on FOUR sets of properties, totaling approximately 110 parcels, will be significantly adversely impacted if this application is approved.

**THE OWNERS OF THESE PARCELS WILL BE CONSTRAINED FROM DEVELOPING THEIR OWN PROPERTIES AS ZONING ALLOWS**



PROPERTY GROUP 1, 35 PARCELS N TAMPICO, page 7 for a full-size image:

Approval of this application will open up a new view of the new landfill in these uphill parcels' viewshed, which from a property development point of view will adversely impact development potential. Property owners will be constrained on siting structural additions or ADU's, or even window placement because of the objectionable view. They will not be able to remove vegetation on their own property for firewood or to clear a garden area or to open up pasturage or for outbuilding placement -- all activities typical in RR zones.

The photographs shown are Google map images from the green & red circle location facing toward the quarry area. The red view is one click further down Tampico Road, and illustrates how easily a view of the landfill from these properties could be opened up on these parcels.

**THE OWNERS OF THESE PARCELS WILL BE CONSTRAINED FROM DEVELOPING THEIR OWN PROPERTIES AS ZONING ALLOWS**

**FROM THE POINT OF VIEW OF AN ARCHITECT AND REAL ESTATE PROFESSIONAL, THIS IS A SIGNIFICANTLY ADVERSE IMPACT**

**IT AFFECTS APPROXIMATELY 35 PARCELS IN THIS AREA.**



PROPERTY GROUP 2. 45 PARCELS S TAMPICO. page 8 for a full-size image:

In 1994, an almost-identical expansion was proposed, waste disposal onto the 59-acre parcel that the County had previously committed would remain buffer area. This expansion was denied after evidence was provided to Commissioners by a Tampico homeowner that a buyer had backed out of a deal to buy her house "after he heard that the landfill might be expanded." If you cannot sell your home because of a change in use on an "adjacent parcel" that is a significant adverse impact.

**THE OWNERS OF THESE PARCELS WILL BE CONSTRAINED FROM SELLING THEIR OWN PROPERTIES AS THEY WOULD BE ABLE TO IF THEIR PROPERTIES WERE LOCATED IN ANY OTHER AREA OF BENTON COUNTY.**

**FROM THE POINT OF VIEW OF AN ARCHITECT AND REAL ESTATE PROFESSIONAL, THIS IS A SIGNIFICANTLY ADVERSE IMPACT**

**IT AFFECTS APPROXIMATELY 45 PARCELS IN THIS AREA.**



(If further evidence is required on the chilling impacts of the landfill on property sales, a 2023 sale of a farm property -- Emerson Vineyard -- did not go through as a result of odor impacts (which, per the applicants' consultants models, are non-detectible on abutting properties. The Emerson Vineyard is about 4 miles away.)



PROPERTY GROUP 3 TAMPICO RIDGE, page 9 for a full-size image:

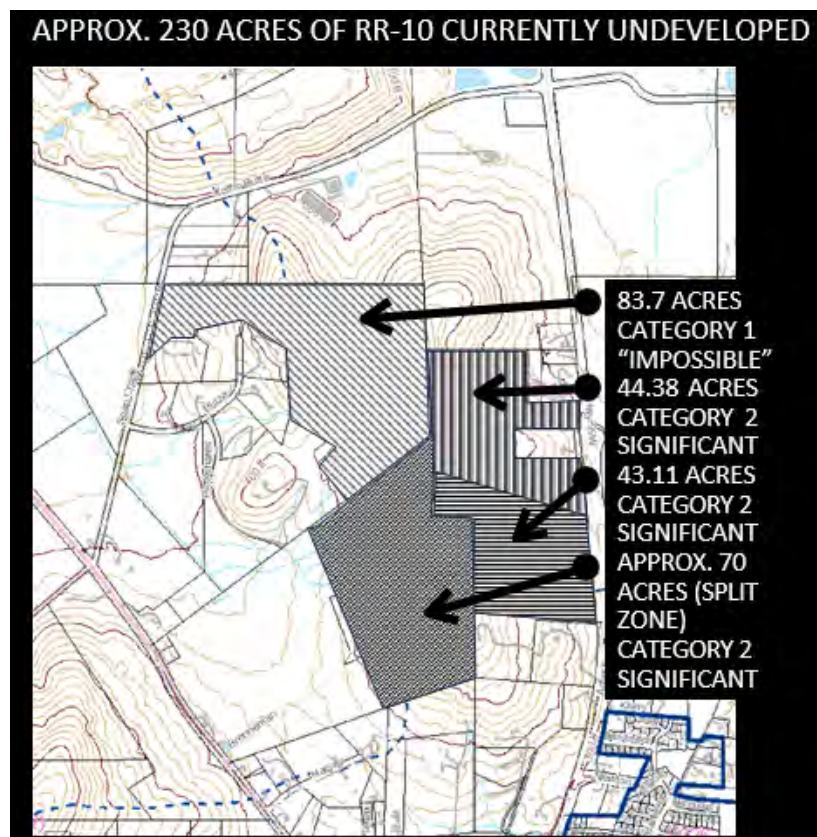
There are 4 undeveloped RR-10 parcels atop Tampico Ridge, comprising a total of approximately 230 acres, developable per current Benton County Code into approximately 23 potential small-lot homesites. Of these 230 acres, 150 acres would be significantly adversely impacted if this application were to be approved.

A developer aims to make about 20-30% profit. But nearby landfills, especially high-volume, very visible landfills, depress home values by 13.7% on average. So it would be very difficult for development of these parcels to pencil out. Additionally, one of the largest development expenses is loan carrying costs. Since disamenities also increase days-on-market (DOM), developers would face a double burden developing these parcels. Furthermore, if construction of the landfill impacted water availability, development would be **IMPOSSIBLE**.

**THE OWNERS OF THESE PARCELS WILL BE CONSTRAINED FROM DEVELOPING THEIR OWN PROPERTIES AS ZONING ALLOWS.**

**FROM THE POINT OF VIEW OF AN ARCHITECT AND REAL ESTATE PROFESSIONAL, THIS IS A SIGNIFICANTLY ADVERSE IMPACT**

**IT AFFECTS APPROXIMATELY 15 POTENTIAL HOMESITES.**



PROPERTY GROUP 4 SOAP CREEK & 1 TAMPICO RIDGE PARCEL, see page 10

The FOUR Forest Conservation parcels to the west of the 59-acres and the 83.7-acre parcel to the south of the 59-acres directly abut the (respective) west and south property lines of the parcel the applicant proposes to locate 9,000,000 cubic yards of municipal waste, industrial waste, & sewage sludge.

These parcels will have property lines that will face a malodorous 100'-tall wall of garbage.

**THE OWNERS OF THESE PARCELS WILL BE COMPLETELY CONSTRAINED FROM DEVELOPING THEIR OWN PROPERTIES AS ZONING ALLOWS.**

**FROM THE POINT OF VIEW OF AN ARCHITECT AND REAL ESTATE PROFESSIONAL, DEVELOPING THESE PARCELS AS ZONING ALLOWS WOULD BE IMPOSSIBLE. NO REASONABLE PERSON WOULD INVEST MONEY TO IMPROVE ANY OF THESE PARCELS AS SMALL-LOT HOMESITES.**

**THIS AFFECTS APPROXIMATELY 12 POTENTIAL HOMESITES.**

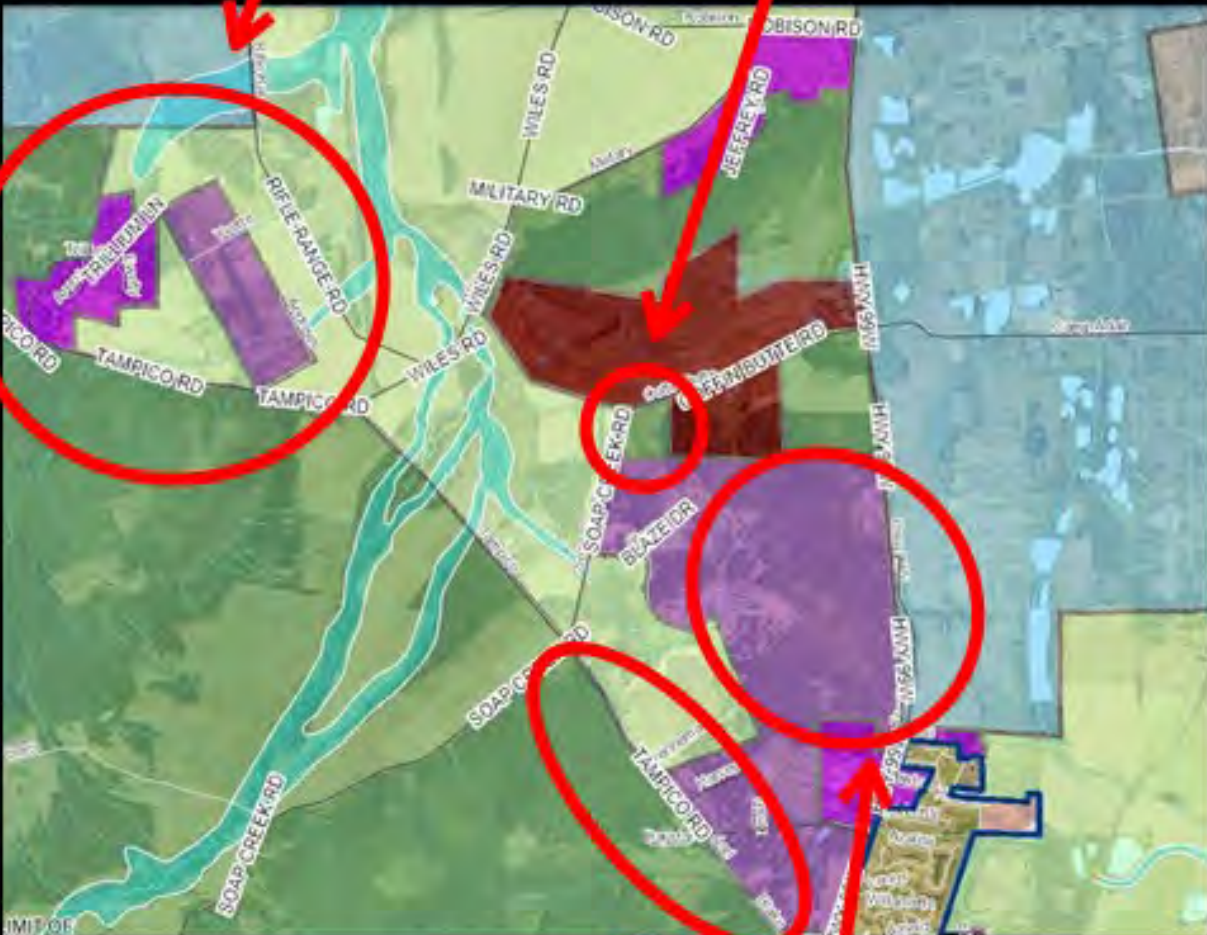
**THIS AFFECTS ONE PARCEL THAT IS INHABITED BY AN ELDERLY COUPLE WHO HAVE A SMALL FARMING OPERATION. THAT PARCEL WOULD ALSO BE IMPACTED BY THE PROPOSAL TO ADD COMMERCIAL ACTIVITY TO THE FC PARCEL DIRECTLY TO THE NORTH OF THEIR PROPERTY.**

**THE APPLICANT IN BURDEN OF PROOF, PAGE 40 (OCTOBER 30, 2024) ACKNOWLEDGES THAT MAKING DEVELOPMENT OF AN ADJACENT USE "IMPOSSIBLE" IS A DE-FACTO ADVERSE IMPACT.**



**SIGNIFICANTLY ADVERSE**

**IMPOSSIBLE**

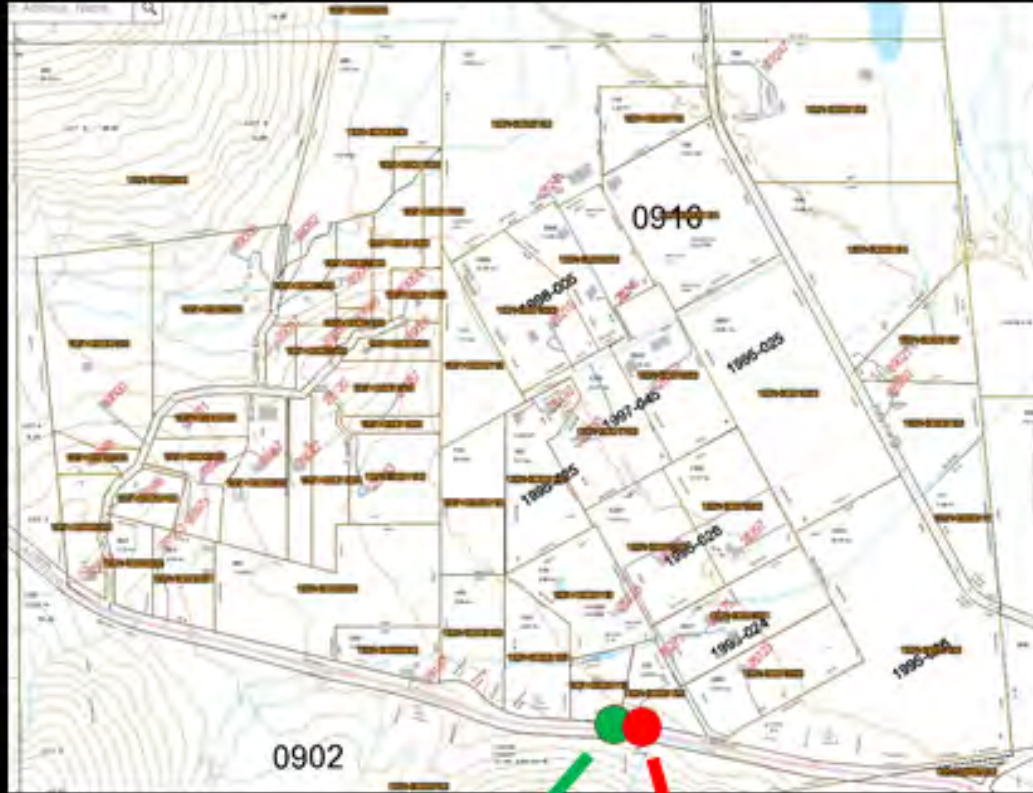


**SIGNIFICANTLY  
ADVERSE**

**IMPOSSIBLE (TOP 83.7 AC) &/OR  
SIGNIFICANTLY ADVERSE (150 AC)**



## PARCELS ON NORTH TAMPICO VIEWSHED (UPHILL)



35 (+/-) RR-5 & RR-10 & EFU PARCELS



PROPERTY OWNERS UNABLE TO CUT DOWN TREES  
ON THEIR OWN PROPERTY

**USE IMPACT: SIGNIFICANTLY ADVERSE**



## PARCELS ON TAMPICO POTENTIALLY UNSALEABLE



45 (+/-) RR-5 & RR-10 PARCELS

### Commission denies landfill expansion

By Jim Sams

Still enough room to dump trash for at least years at the Coffey State Landfill, Sanjour County commissioners are so sure they'll decide just how much the landfill should be allowed to expand.

The commissioners voted unanimously Wednesday to deny a zoning change that would have expanded the landfill's zone by 20 acres and allowed trash to be piled to the top of an adjacent hill.

The proposal was going to be heard when the subject of this decision is set. Commissioner Kent Landis said.

Residents who live near the landfill left Wednesday's meeting with a mixed attitude.

Patricia Dunning said a buyer backed out of a deal to buy her



Commissioners

Fellow

home on Tampico Road after he heard that the landfill might be expanded. She and her neighbors feared the landfill would fill ground water and ruin the scenery.

Dunning said other residents worry the expansion even though they had praised Exide Landfill managers of the dump.

See County News page

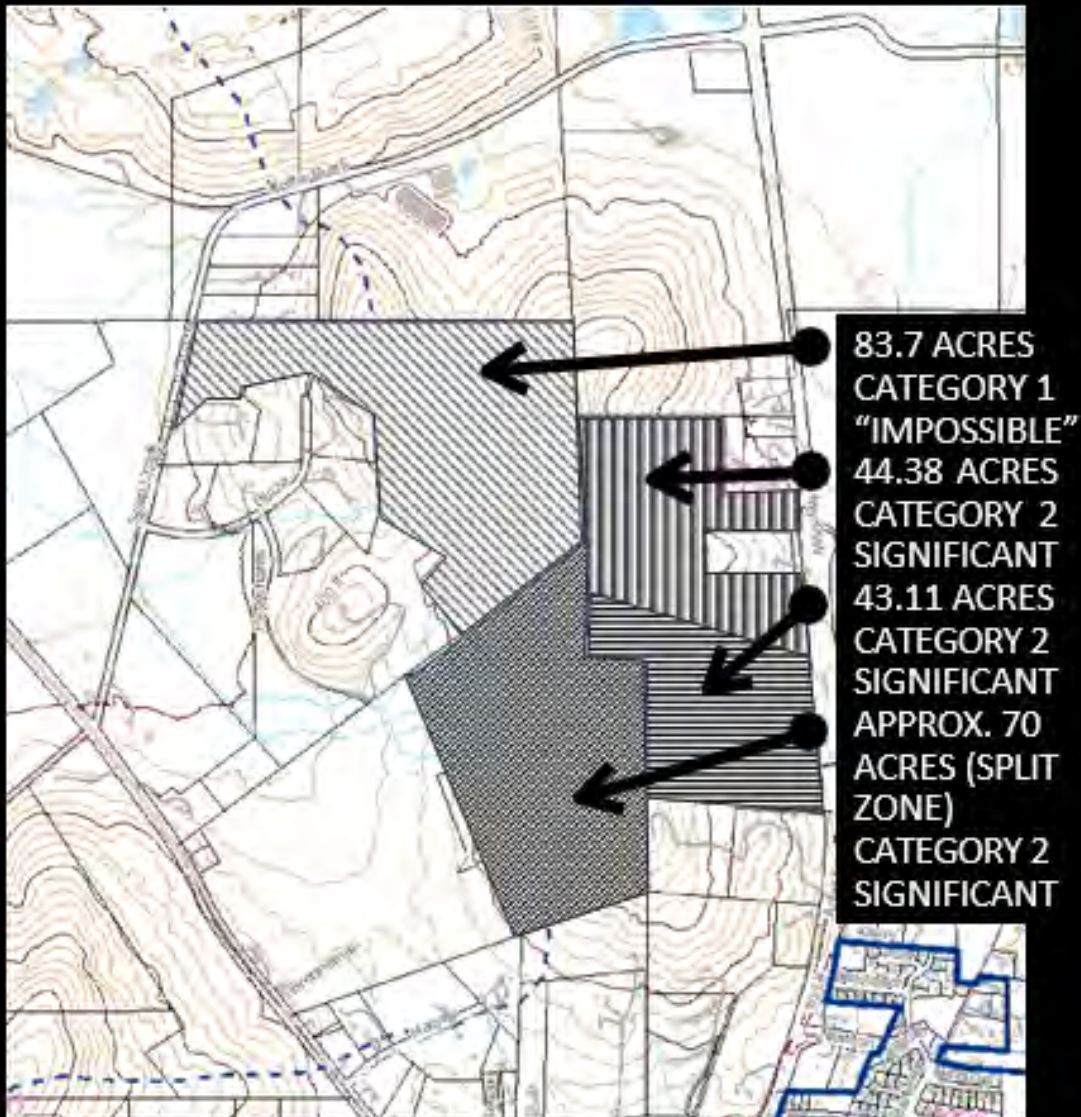
1N 1994 A SIMILAR APPLICATION WAS SUBMITTED FOR A C.U.P.

COMMISSIONERS ULTIMATELY DENIED THAT APPLICATION IN PART BECSAUSE IT THREATENED THE VERY SALEABILITY OF HOMES ON TAMPICO (A SIGNIFICANT IMPACT)

“Patricia Dunning said a buyer backed out of a deal to buy her house on Tampico Road after he heard that the landfill might be expanded...”

USE IMPACT: SIGNIFICANTLY ADVERSE

## APPROX. 230 ACRES OF RR-10 CURRENTLY UNDEVELOPED



**CATEGORY 1: RR-10 POTENTIALLY 8 UNITS (2-ACRE MINIMUM)**  
IF APPLICATION APPROVED, UNDEVELOPABLE  
("LANDFILL BUFFER" = ILLEGAL USE IN RR-10)

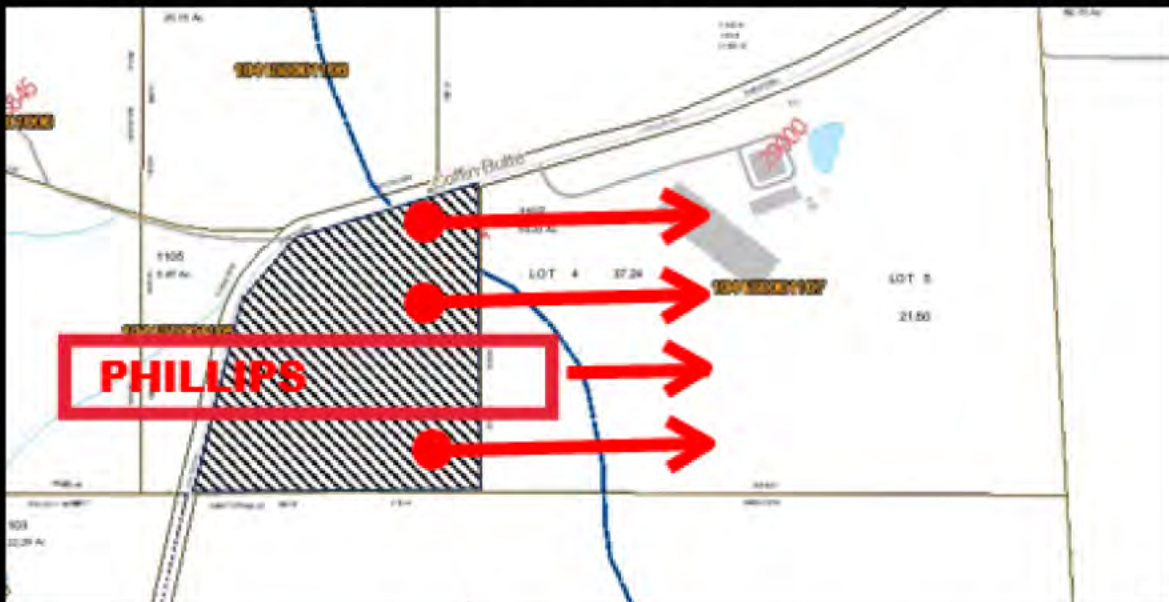
**CATEGORY 2: RR-10 POTENTIALLY 15 UNITS; IF APPROVED,**  
SIGNIFICANTLY MORE DIFFICULT TO DEVELOP\*

\*IF WATER ACCESS IS COMPROMISED, UNDEVELOPABLE

**USE IMPACT: "IMPOSSIBLE" &/OR SIGNIFICANTLY ADVERSE**



## 4 FOREST CONSERVATION PARCELS WITH HOMES



IF APPROVED THESE PARCELS WILL BACK ONTO A 100-FOOT-TALL WALL OF WASTE.

THESE PARCELS WILL BE PERMANENTLY UNDEVELOPABLE AND LOSE THEIR ZONED USE

USE IMPACT: **"IMPOSSIBLE" = ADVERSE (PER B.O.P. p. 40)**



NANCY WHITCOMBE 37049  
MOSS ROCK DRIVE CORVALLIS  
OREGON 97330

- LAND USE PROFESSIONAL FOR 40 YEARS
- RETIRED LICENSED ARCHITECT (1989)
- PLANNING COMMISSIONER (1999-2014)
- EDUCATOR (ART & LANDSCAPE ARCHITECTURE HISTORY)

LEED AP

BA ARCHITECTURE (PRINCETON, 1983)  
MARCH ENVIRONMENTAL DESIGN (WITH LAND USE CONCENTRATION,  
SPECIFICALLY NEW URBANISM) (UC BERKELEY, 1989)

I HAVE WORKED WITH NON-PROFIT & PROFIT DEVELOPERS DESIGNING &  
BUILDING HUNDREDS OF UNITS OF AFFORDABLE AND MARKET RATE  
HOUSING PROJECTS

I HAVE MANAGED A FAMILY REAL ESTATE PORTFOLIO SINCE 1994.

## PARKVIEW COMMONS AFFORDABLE HOUSING 1991



DESIGN EXCELLENCE AWARD, SFC AIA  
GOLD NUGGET AWARD OF MERIT