



1022 NW Marshall St. Suite 380  
Portland, OR 97209

[www.cascadia-partners.com](http://www.cascadia-partners.com)

## MEMORANDUM

TO: Benton County Community Development Department  
FROM: Cascadia Partners  
DATE: May 6th, 2025  
PROJECT: Benton Believes Comprehensive Plan Scoping  
RE: **Voluntary Periodic Review Findings**

### Background

In November 2023, Benton County was awarded grant funding to begin scoping the process of Voluntary Periodic Review (VPR) for its Comprehensive Plan. VPR ensures that the county's Comprehensive Plan is effectively advancing Oregon's statewide land use planning goals in a manner that is tailored to and supportive of the local communities. In 2024, Cascadia Partners (CP) was hired by Benton County to assist with execution of grant-related work. This work included developing an inclusive public engagement plan, identifying emerging trends and community concerns, reviewing the 2007 plan, and helping the County make the case for VPR.

The following memorandum is intended to provide Benton County with information needed to support its request to the Land Conservation and Development Commission (LCDC) to begin the VPR process. It lays out the conditions needed to necessitate VPR, specifically those cited in ORS 197.628(3)(a) - (d).

### Public Engagement

CP, in partnership with Benton County staff, conducted the following public engagement work between August of 2024 and May of 2025.

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#### Comprehensive Plan Advisory Group (CPAG)

CP and Benton County staff chartered a Comprehensive Plan Advisory Group (CPAG) consisting of community members, representatives of public agencies, representatives of non-profit and community-based organizations, and members of the business community.

This group met three times to review work progress and identify emerging trends that could impact Benton County in the future.

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## Community Priority Survey

In March of 2024, Benton County circulated a public survey asking the community what they feel is most important for the Comprehensive Plan to focus on. The survey received over 400 responses and identified these priorities.

The current Comprehensive Plan reflects some of these priorities, but fails to adequately address others. Some key unaddressed priorities include:

- Changing future natural conditions
- Proactive hazard mitigation
- Housing production and affordability
- Robust multilingual community engagement

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## Listening Sessions

Benton County staff held four listening sessions in locations across the County. During these sessions, participants were asked to identify aspects of the County services that they value and would like to retain as well as aspects they would like to see improved. Forty-three (43) respondents contributed feedback, which was summarized and presented to the CPAG.

## The VPR Process

Periodic Review is Oregon's process for ensuring comprehensive plans are continually updated and consistent with the statewide planning goals. Periodic review is optional for County comprehensive plans, and jurisdictions within UGBs have traditionally been prioritized for technical assistance funding. Counties, however, are not immune to many of the same issues facing incorporated cities - housing shortages, complex economies, and the need for community services and facilities. In addition, they must also grapple with sensitive resource issues related to natural, farm, and forest lands.

In order to begin the VPR process, a jurisdiction must demonstrate to LCDC that there is a need to do so. In order to demonstrate this need, Benton County must show LCDC that since implementing the 2007 Comprehensive Plan:

- County circumstances have changed
- Policies in the 2007 comprehensive plan are inconsistent with current goals
- Outside issues have arisen that must be addressed

- The goals of the 2007 Comprehensive Plan are not being met

In order to be considered for VPR approval, the County must complete the following steps:

1. Submit an official request for VPR to LCDC (substantiated by the content of this memorandum)
2. The request must meet certain statutory requirements (OAR 660-025-0035 and ORS 197.629)
3. Upon approval, the County must review and update the public involvement plan for the comprehensive planning process
4. DLCD's Periodic Review Assistance Team (PRAT) will review the 2007 plan for inconsistencies with state law
5. Benton County must produce a work program outlining tasks needed to complete periodic review - this must be approved by DLCD

## VPR Criteria

The criteria for Voluntary Periodic Review are listed in ORS 197.628(3). The remainder of this memorandum will focus on providing a basis for each of the four criteria based on the work completed by Cascadia Partners.

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### ORS 197.628(3)(a)

*There has been a substantial change in circumstances including but not limited to the conditions, findings, or assumptions upon which the comprehensive plan or land use regulations were based, so that the comprehensive plan or land use regulations do not comply with the statewide planning goals relating to economic development, needed housing, transportation, public facilities and services and urbanization;*

Since the Comprehensive Plan was last adopted in 2007, Benton County has experienced changing conditions that call into question the assumptions upon which the plan's policies were developed. These include:

### ***The Housing Crisis***

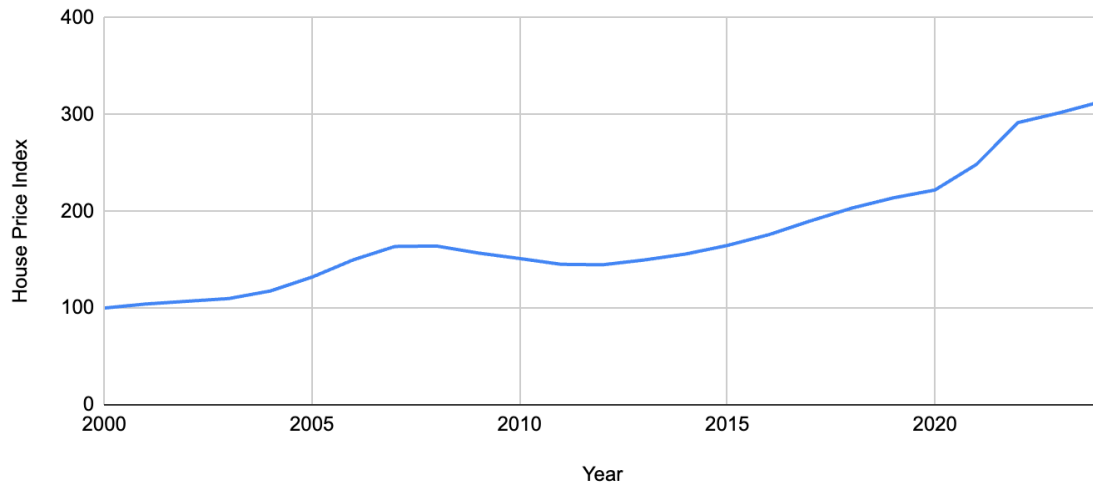
When the Comprehensive Plan was last updated, rising home prices nationwide were kept in check by a rapid pace of construction. Following the sub-prime mortgage crisis and great recession, housing markets were slow to recover and housing production in many markets, Benton County included, fell far behind housing need. As a result, home prices in Benton County have increased by 91% since 2007<sup>1</sup> while during that same time period, the county

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<sup>1</sup>U.S. Federal Housing Finance Agency, All-Transactions House Price Index for Benton County, OR [ATNHPIUS41003A], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/ATNHPIUS41003A>, May 5, 2025.

median income increased by only 46%<sup>2</sup>. The Comprehensive Plan’s Goal 10 Housing chapter provides sparse direction on this issue because it was written during a time when the term "housing crisis" had not yet come into existence. It contains a mere six policies, only two of which address housing affordability or low-income household assistance.

*All-Transactions House Price Index, Benton County, OR*  
*Source: Federal Reserve Bank of St. Louis*



With the passage of HB 2001, HB 2003, and former Governor Brown’s Climate-Friendly and Equitable Communities (CFEC) executive order, many jurisdictions have been spurred into action with revisions to their development codes and exploration of housing production strategies. Since Benton County is not subject to these rules, it needs strong direction from its Comprehensive Plan in order to spur similar pro-housing actions.

### ***More Frequent and Severe Droughts and Wildfires***

Benton County contains five officially-recognized unincorporated communities: Alsea, Wren, Alpine, Bellfountain and Greenberry. These communities exist among natural areas with significant riparian and wetland resources, economically and ecologically productive forest lands, and rich Willamette Valley farmland. The harmony and continued health of these landscapes is threatened by more frequent and severe weather events driven by climate change. Chief among these is persistent drought and associated wildfires.

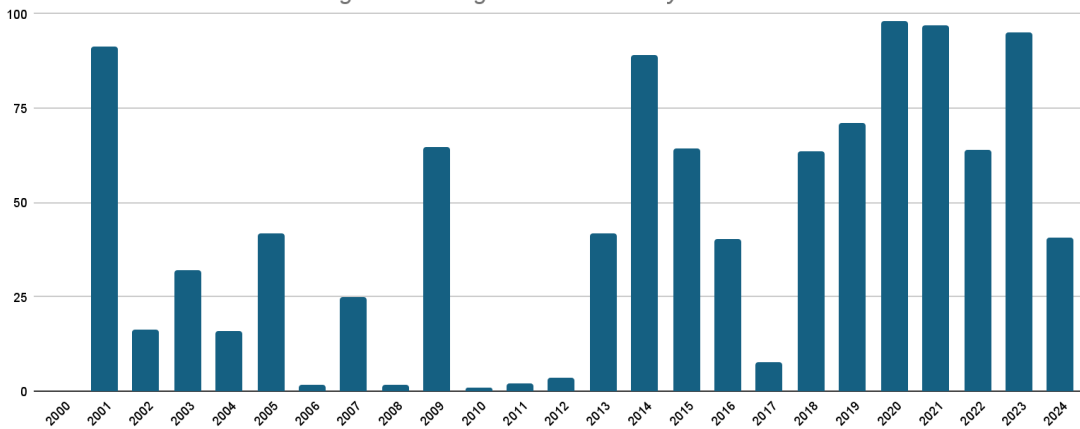
Climate change is causing abnormally dry conditions in Benton County to occur more frequently. Between 2000 and 2007, there was only 1 year where at least half of the County was considered abnormally dry. Between 2008 and 2024, abnormally dry conditions occurred, on average, every other year<sup>3</sup>.

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<sup>2</sup> Census American Community Survey, 5-Year Estimates, Table S1903

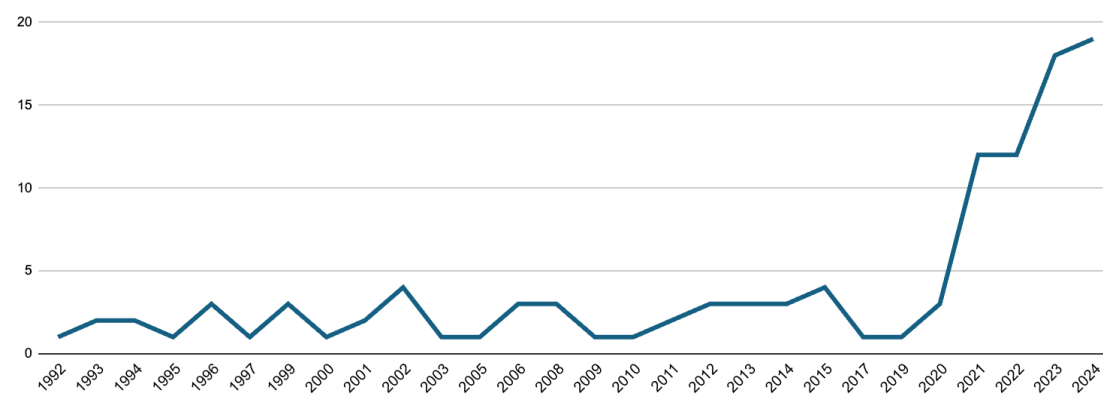
<sup>3</sup> NOAA National Integrated Drought Information System, <https://www.drought.gov/>

*Percent of Land Area Considered Abnormally Dry, Benton County, OR*  
Source: NOAA / National Integrated Drought Information System



Increasingly dry conditions have led to more frequent and severe wildfires. Between 1992 and 2007, the average annual number of wildfire incidents in the county was just under 2. Since 2020, that number has increased to just under 13<sup>4</sup>.

*Wildfire Occurrence, Benton County, OR*  
Source: National Interagency Fire Center



The Comprehensive Plan’s Natural Hazards chapter includes policy subsections on wildfires, but fails to connect its occurrence to more frequent dry conditions and climate change. The Comprehensive plan does not sufficiently address climate change and doesn’t prepare strategies to address the uncertainties that come with changing conditions. Additionally, Benton County residents feel that the risk of wildfire and drought is increasing, and the current Comprehensive Plan may only be passively preparing for impacts rather than proactively planning to mitigate risks.

<sup>4</sup> National Interagency Fire Center, InFORM Fire Occurrence Data Records, <https://data-nifc.opendata.arcgis.com/datasets/nifc::inform-fire-occurrence-data-records/about>

### ***Forestry and Agriculture Industry Shifts***

Oregon's timber industry has seen many changes in recent history, both before and after the 2007 Comprehensive Plan was adopted. Particularly, increased protections of public land, climate impacts, increased automation, and large timber corporations driving out smaller timberers have reduced jobs provided and taxes generated by the timber industry.

While Benton County's agriculture industry has remained fairly stable, there have been challenges in recent years in regards to costs, land, and labor. This results in fewer potential farmers able to afford the land to start a farm, and fewer farms able to function in a financially feasible manner.

### ***Shifting Federal Priorities***

More recently, there have been shifts in federal funding priorities that will impact housing, economic development, public facilities, and natural resources. Reduced federal assistance for programs and services may necessitate new and creative sources of local or regional funding. Trends toward deregulation may strip away protections for certain natural and forest lands which may. Local action may be required to continue the same level of protection previously assumed due to federal regulations. Finally, federal trade policies may impact existing industries in Benton County, requiring a new approach to economic development.

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### ***ORS 197.628(3)(b)***

*Decisions based on acknowledged comprehensive plan and land use regulations are inconsistent with the goals relating to economic development, needed housing, transportation, public facilities and services and urbanization;*

Benton County's 2007 Comprehensive Plan prioritized the protection and preservation of forest and farmland:

*"Policy 2.1.4: In order to preserve farm and forest land, Benton County shall limit rural residential development to areas where goal exceptions have been allowed."*

While this is aligned with many community goals, it may have had an unintended consequence of exacerbating rural housing shortages. Benton County's Comprehensive Plan process should examine how its own zoning and land use policies might be hindering housing development

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**ORS 197.628(3)(c)**

*There are issues of regional or statewide significance, intergovernmental coordination, or state agency plans or programs affecting land use which must be addressed in order to bring comprehensive plans and land use regulations into compliance with the goals relating to economic development, needed housing, transportation, public facilities and services and urbanization; or*

The Coffin Butte Landfill is a 740-acre privately-owned solid waste facility located in northeastern Benton County. It is one of the largest such facilities in Oregon, accepting over 1.1 million tons of waste annually. Since 2021, the owners of Coffin Butte, Republic Services, have sought to expand the landfill to handle Western Oregon’s projected solid waste disposal needs. While waste disposal capacity is a necessary element to support continued regional growth, there is substantial public concern over this proposal.

The Comprehensive Plan should provide a venue for long-range planning around this issue. Not only how the County’s transportation, land use planning, and public facilities should respond to an expansion (should it proceed), but also ways that residents and businesses can reduce their contributions to the solid waste stream. The 2007 Comprehensive Plan has only one policy pertaining to Coffin Butte and one pertaining to solid waste reduction, both of which are general in nature:

*“Policy 6.5.8: Benton County shall assure safe, accessible, and environmentally sound disposal of solid waste at the Coffin Butte Regional Sanitary Landfill.”*

*“6.5.3 Benton County shall increase, to the maximum degree possible, the salvage reclamation, recycling, and reuse of materials from solid waste.”*

A future update to the Comprehensive Plan should provide the community with an opportunity to discuss both issues and should result in more specific and implementable policies.

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**ORS 197.628(3)(d)**

*The local government, commission or department determines that the existing comprehensive plan and land use regulations are not achieving the statewide planning goals relating to economic development, needed housing, transportation, public facilities and services and urbanization.*

One of the marquee items in the Benton County Community Development Department’s 2023-2033 Strategic Operations Work Plan is identifying a strategy to begin a Comprehensive Plan update. At that time, the County Board of Commissioners agreed that the 2007 Comprehensive Plan was not addressing statewide planning goals in a way that reflected the community’s priorities.

Subsequently, Cascadia Partners worked with Benton County staff to assess more specifically what the community would like to see in a revised Comprehensive Plan. The following is a summary of conversations undertaken with the Comprehensive Plan Advisory Group (CPAG), results of a community priorities survey, and input received from several in-person listening sessions held in various locations across Benton County.

### ***Natural Disasters & Climate Change***

Much of Benton County's current comprehensive focuses on and prioritizes natural environments, resources, and hazards. While this has remained consistent with the community of Benton County's current priorities, the areas of approach in the Comprehensive Plan are not entirely encompassing the areas identified by the public. The areas that the Benton County Community feel is particularly important to prepare for in the comprehensive plan are Natural Resource Management, Disaster Readiness & Response, and Infrastructure Upgrades. The areas that the current Comprehensive Plan focuses on are Agricultural & Forest Land, Natural Resources, Scenic & Historic Areas & Open Spaces, Air, Water & Land Resource Quality, Natural Hazards, and the Willamette River Greenway. Despite the overlap, there are a couple key gaps.

The Comprehensive plan does not sufficiently address climate change and doesn't prepare strategies to address the uncertainties that come with changing conditions. Additionally, Benton County residents feel that the risk of wildfire and drought is increasing, and the current Comprehensive Plan may only be passively preparing for impacts rather than proactively planning to mitigate risks.

#### **Community Priorities for the Comprehensive Plan Update:**

- Natural Resource Management: Support wildfire prevention, watershed protection, and sustainable land use practices to reduce environmental risks.
- Disaster Readiness & Response: Strengthen and invest in emergency plans, early warning systems, and community preparedness efforts to reduce risks.
- Infrastructure Upgrades: Invest in resilient roads, water systems, and energy infrastructure to withstand natural disasters and climate impacts.
- Resilient Land Use & Development: Guide new development away from high-risk areas and plan for rebuilding strategies that improve long-term safety.

### ***Population & Changing Demographics***

The Benton County community identified housing availability and affordability as a key priority that is not currently being met in the County. The Comprehensive Plan addresses



housing as a goal, however, the policies are not specific or proactive. Affordability is only lightly mentioned and the strategies for producing housing are vague and non-committal. The Comprehensive Plan is insufficiently enacting robust strategies to plan for the community's housing needs. Strategies should be considered to address housing production, land use policies, and housing affordability.

**Community Priorities for the Comprehensive Plan Update:**

- Housing Availability & Affordability: Population changes could affect housing demand and the need for new types of development.
- Land Use & Development: Population shifts could influence the need for housing, agricultural land, forestry, and waste management planning.
- Public Services & Infrastructure: Changes in population size may impact demand for transportation, parks, roads, water, and other public services.
- Evolving Community Needs: Population changes may impact local businesses, schools, healthcare, and recreation.

***Government & Funding Priorities***

Benton County residents' top governmental priorities are strengthening public engagement, investing in sustainable infrastructure, and updating the development code. The Comprehensive Plan includes goals to address citizen involvement, land use planning, public facilities, and transportation, but these goals may not include policies that are robust enough to address the community need. In particular, the Comprehensive Plan's approach to addressing community engagement focuses on forming citizen advisory groups, but doesn't include strategies to promote additional forms of deeper or diversified engagement. The land use planning goal prioritizes the protection and preservation of forest and agricultural land; however, this might be coming at the cost of housing production. The Benton County community identified a desire to update the development code to increase the feasibility of development and environmental standards.

In addition, the Comprehensive Plan states that the plan should be updated at least every 10 years, yet has not been updated for 18 years and counting.

**Community Priorities for the Comprehensive Plan Update:**

- Strengthening Public Engagement: Foster trust and transparency in local government decision-making by improving community outreach and participation.

- Sustainable Infrastructure Investments: Advocate for continued investment in transportation, public transit, and infrastructure that supports community mobility & sustainability.
- Update Development Code: Update zoning and land use regulations to better align with evolving environmental standards and government policies, ensuring a balance between development interests and sustainability.
- Diversified Funding Sources: Explore funding opportunities at the non-profit, local and state levels to support housing, social programs, and economic development.

### ***Economic Shifts***

The Comprehensive Plan addresses economic development, however, the policies in the plan are vague and do not sufficiently address how the County will promote business and address industry shifts. The Plan focuses on the types of businesses the County intends to encourage, and not how they will be supported in uncertain future conditions. However, the Comprehensive Plan does sufficiently apply protections to agricultural and forest industry land. The priorities identified by the community are Land Use & Business Growth, Infrastructure & Services, and Workforce Changes. While the land use and business growth is at least partially addressed, there aren't strategies in place to address how future industries may impact the infrastructure network or workforce.

### ***Community Priorities for the Comprehensive Plan Update:***

- Land Use & Business Growth: New and existing industries may compete for space and resources, influencing how land is used and developed.
- Infrastructure & Services: Growing industries may bring new investments and jobs but could also require upgrades to utilities, broadband, and transportation.
- Workforce Changes: As industries grow and shift, new job opportunities may emerge, requiring a shift in workforce training and skill development.
- Agricultural Innovation: Advances in farming and automation may create new efficiencies and opportunities while also changing traditional practices and land use.

### ***Technology & Remote Work***

Technology and remote work was not identified as a strong community priority, though there were still aspects of the topic area that were noted. In particular, the impacts of remote work on rural housing and community. The policies in the Comprehensive Plan's Housing goal were written before remote work rose in frequency in 2020, and as such does not address the impacts technology specifically has on housing.

*Community Priorities for the Comprehensive Plan Update:*

- Rural Housing & Economy: Remote work could increase demand for rural housing while also supporting different local businesses and expanding job opportunities in new areas.
- Community Connection: As more services and jobs move online, in-person interactions may change, creating both challenges and new opportunities for community engagement.
- Internet & Infrastructure: Improved access to high-speed internet could boost education, business growth, and remote work, but gaps in coverage may create disparities.
- Energy & Resource Use: Expanding industries like data centers and high-tech agriculture could create jobs and economic growth while also increasing demand for electricity and water.