

**From:** [Emily](#)  
**To:** [Coffin Butte Landfill Appeals](#)  
**Subject:** RE: LU-24-027 Coffin Butte Landfill Expansion – Responsive Written Testimony (Second 7-Day Period)  
**Date:** Friday, January 30, 2026 5:04:47 PM  
**Attachments:** [1.30.26%20testimony%20response.pdf.pdf](#)

---

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please see testimony attached.

Thank you.



---

Subject: LU-24-027 – Responsive Written Testimony (Second 7-Day Open Record Period)

Dear Benton County Board of Commissioners,

Attached please find my written testimony submitted during the responsive open-record period for reconsideration of LU-24-027, Coffin Butte Landfill Expansion.

This testimony responds to evidence and argument submitted during the first seven days of the reopened record, including the DEQ operational pre-violation letter and first-week testimony addressing odor impacts, monitoring limitations, and reliance on future compliance as they relate to applicable approval criteria.

Thank you for the opportunity to submit responsive testimony for the Board's consideration.

Respectfully,

Emily Wells  
Benton County Resident  
Owner and Director, Nature's Way Playschool



Nature's Way Playschool  
Corvallis, Oregon 97330



Benton County Commissioners  
4500 SW Research Way  
Corvallis, OR 97333

*Submitted via email*

RE: LU-24-027 Coffin Butte Landfill Expansion – Responsive Written Testimony (Second 7-Day Period)

Dear Commissioners Malone, Shepherd, and Wyse,

I submit this written testimony during the responsive open-record period for reconsideration of LU-24-027, Coffin Butte Landfill Expansion. This testimony responds to the DEQ operational pre-violation letter admitted into the record, as well as evidence and argument submitted during the first seven days of the reopened record concerning odor impacts, monitoring limitations, and reliance on future compliance as they relate to applicable approval criteria.

I am a Benton County resident and the operator of a home-based, nature-oriented playschool. I have lived in this area for approximately eight years and am a lifelong resident of the region. My residence and program are located approximately three miles from the Coffin Butte Landfill. My property functions as both a residence and an active, child-centered educational use that depends on sustained outdoor access as a core operational requirement. Outdoor air quality directly determines whether the use can occur on any given day. As a result, odor and air-quality impacts bear directly on land-use compatibility, livability, and human welfare under applicable approval criteria.

This use existed prior to the proposed expansion and has operated continuously under applicable zoning and land-use approvals.



Nature's Way Playschool  
Corvallis, Oregon 97330

### **Response to Evidence of Odor Impacts Under Existing Operations**

During the first seven days, Ms. Yoshihara described persistent and disruptive odor conditions occurring under existing landfill operations. My experience independently corroborates this testimony.

For the over eight years of the time I have lived and operated at this location, landfill odors were infrequent and episodic and did not materially interfere with daily activities or property use. Over approximately the past two years, I have observed a clear and sustained change in odor conditions. Odors now occur more frequently and persist for longer durations, reaching a level of severity that interferes with ordinary residential and program use.

As Ms. Yoshihara notes, reports are typically made when odors reach a threshold that materially impacts daily life. My experience reflects this same threshold-based reality. The increased frequency of disruptive odor events represents a material change in conditions under existing operations, not heightened sensitivity or awareness.

### **Response to Evidence Regarding Atmospheric Conditions and Geographic Extent**

Ms. Yoshihara's testimony documents the role of fog, temperature inversions, and stagnant air in prolonging odor events. My experience confirms these conditions and their effects.

During mid- to late-January 2026, under dense fog and stagnant air conditions, landfill odors became trapped and persisted across multiple consecutive days. During this period, I experienced strong, sour, chemical-smelling odors at my property approximately three miles from the landfill. These odors did not dissipate during the day and made outdoor use of the property impracticable.

During the same event, odors were also noticeable at the South Co-op in Corvallis, approximately ten miles from the landfill site, indicating a broad geographic reach under low-dispersion conditions. While this January event was among the most acute I have experienced, similar odor events have occurred repeatedly in recent months.

### **Response to Evidence of Monitoring and Reporting Limitations**

Ms. Ohmann's testimony explains that existing monitoring and modeling methods fail to capture episodic, localized odor events shaped by topography and atmospheric conditions. My experience supports this conclusion.

During odor events severe enough to prevent outdoor use of my property, publicly available air-quality indicators continued to show "good" conditions. This discrepancy illustrates the limitation of generalized metrics in capturing impacts that directly affect land-use decisions, livability, and daily operations.

I only recently became aware of the state odor reporting system and have begun submitting reports accordingly. The frequency of odor events reaching reportable severity predates my awareness of the system. Increased reporting reflects the regularity and intensity of current impacts, not a recent emergence of concern. This aligns with first-week testimony that reporting data likely underrepresents actual conditions experienced by nearby residents.



### **Response to First-Week Evidence Regarding Human Welfare and Land-Use Compatibility**

The DEQ pre-violation letter admitted into the record documents failures in landfill gas control and confirms that odor impacts affect human welfare. My lived experience provides context for how these regulatory findings translate into real-world land-use impacts.

During recent odor events, I experienced physical discomfort while outdoors, including nausea and stomach pain. As a result, I made precautionary decisions to curtail or suspend outdoor activities. For the first time in my years living and operating at this location, outdoor use was discontinued due to odor conditions rather than weather, scheduling, or other ordinary constraints.

These operational decisions were made to maintain basic health and safety standards and were not discretionary or preference-based.

Because my property serves as both a residence and a child-centered educational environment, outdoor use is not incidental—it is a required operational component. Interference with outdoor access directly affects the viability and compatibility of this use with surrounding industrial activity.

### **Response to First-Week Arguments Regarding Reliance on Future Compliance**

First-week submissions by the League of Women Voters and the Sierra Club raise concerns regarding reliance on future compliance and mitigation assumptions to support expansion approval.

My experience under existing operations supports these concerns. Odor impacts are already occurring with sufficient frequency and severity to interfere with routine residential and child-centered uses. These impacts are not speculative or contingent on future conditions; they are present-day conditions occurring prior to any expansion.

In this context, the DEQ pre-violation letter is directly relevant to whether assumptions relied upon in prior approval adequately accounted for real-world operational performance and its effects on surrounding uses.

### **Relevance to Reconsideration of Approval Criteria**

This testimony is offered to assist the Board in reconsidering whether the proposed expansion can be found consistent with applicable approval criteria in light of newly admitted regulatory evidence and corroborating first-week testimony.

The conditions described above are occurring under existing operations. They already affect land-use compatibility, livability, and human welfare and are consistent with concerns raised during the first seven days regarding odor persistence, monitoring limitations, and unresolved compliance issues.

Respectfully submitted,

Emily Wells  
Benton County Resident  
Owner and Director, Nature's Way Playschool



Nature's Way Playschool  
Corvallis, Oregon 97330