

From: [Marge](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: LU-24-027 – Coffin Butte Landfill Expansion Reconsideration Hearing -- DENY
Date: Monday, January 26, 2026 8:18:29 AM

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I respectfully urge the Benton County Board of Commissioners to exercise its discretion under BCC 53.210 and deny the proposed expansion of the Coffin Butte Landfill.

The Department of Environmental Quality's November 2025 Pre-Enforcement Notice, now properly before you, documents serious and systemic deficiencies in landfill gas management at Coffin Butte, including multiple Class I violations, the most serious category under Oregon environmental enforcement standards. These violations relate to methane emissions monitoring, gas collection system design and operation, landfill cover integrity, and operational controls. Together, they raise substantial concerns regarding whether this facility can be expanded without imposing unacceptable risks to public health, environmental quality, and climate obligations.

In September 2025, I toured the Columbia Ridge Landfill in Arlington, Oregon—an existing, permitted landfill that can serve as an alternative disposal site for Benton County and Oregon waste. What I observed there stands in stark contrast to Coffin Butte.

At Columbia Ridge, landfill gas wells are evenly spaced and systematically maintained. Closed and inactive areas are fully covered with soil and established vegetation. Even the active working face is covered with soil nightly and reopened each morning. In many locations, it is difficult to distinguish closed landfill areas from the surrounding terrain. These are not aesthetic choices; they are operational practices directly tied to effective methane capture, cover integrity, and regulatory compliance.

By contrast, Coffin Butte presents as a visibly stressed facility: exposed waste areas, torn tarps, vegetation emerging through cover seams, and irregular surface conditions—conditions that align disturbingly well with the methane exceedances, monitoring failures, and cover-integrity violations described in the DEQ Pre-Enforcement Notice.

Climate and siting conditions make this contrast especially relevant. Coffin Butte is located in a wetter environment, nearer to population centers, and within more geologically sensitive soils than Columbia Ridge. These conditions demand *greater*, not lesser, operational rigor. Yet the DEQ record regarding Coffin Butte Landfill demonstrates persistent failures to meet even baseline methane control and monitoring requirements.

This contrast is not merely anecdotal. It is corroborated by federal data. Information from the EPA Landfill Methane Outreach Program (LMOP) database shows that Columbia Ridge—despite receiving approximately 2.5 times more annual waste and having more than three times the waste in place—operates with fewer than half the number of gas collection wells as Coffin Butte, yet captures nearly three times as much landfill gas. This is a powerful indicator of the combined importance of siting, system design, and operational discipline.

The DEQ Pre-Enforcement Notice further establishes that Coffin Butte's gas collection and control system has been undersized, poorly monitored, and inconsistently operated, including prolonged flare downtime and repeated failures to perform required re-monitoring and corrective actions. These deficiencies are not speculative; they are documented, ongoing, and unresolved at the time the expansion decision is being reconsidered.

Under BCC 53.215, the Board must determine whether the proposed use would interfere with

adjacent uses, impose undue burdens on public services and infrastructure, and comply with applicable standards and criteria. A facility with a documented pattern of serious methane control failures cannot reasonably be presumed to meet those criteria simply by expanding its footprint.

The question before you is not whether landfills can be well managed—they clearly can be. The question is whether *this* landfill, in *this* location, operated as it has been, can responsibly be expanded. Based on the DEQ enforcement record, federal emissions data, and direct observation of a well-managed alternative facility, I respectfully submit that the answer is no.

I urge the Board to deny the expansion of the Coffin Butte Landfill in order to protect the health, welfare, and economic interests of Benton County residents, and to avoid compounding documented environmental harms with irreversible land use consequences.

Respectfully submitted,

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