From: Debbie P
To: Coffin Butte Landfill Appeals
Subject: LU-24-027 DEQ PEN comment resubmission
Date: Thursday, January 29, 2026 4:09:36 PM
Attachments: Palmer-DEQ-PEN-responsive-testimony_BC04_T0758.pdf

---

At Staff's recommendation I am resubmitting my testimony (Record ID. BC04_T0758) — originally submitted on January 26, 2025 — as a PDF because that submission did not display properly in the record. (The graphics caused the text of the email to be so minute as to be illegible.) Please see attached PDF.

Thank you,
Debbie Palmer

Dear Commissioners,

For years, VNEQS has been telling you that Coffin Butte is a *terrible location for a landfill* because of the wet climate here. Even with an optimal gas collection system there will still be fugitive gas, and the wetter the landfill location, the more gas (and leachate) and corresponding fugitive gas is generated.

The brunt of the DEQ PEN is regarding landfill gas emissions compliance issues.

Below are two representative graphics illustrating *just how much annual climate damage Coffin Butte incurs* - one using 2023 Carbon Mapper data, and an updated one using 2025 Carbon Mapper data. Both show a low, midpoint and high end of the range of damage in metric tons of carbon dioxide equivalent. Note the sharp increase in just two years.

These are merely to help you visualize how much is at stake here.

My point is: although BCC 53.220 allows conditions of approval to mitigate impacts, **the climate is not mitigatable and the Conditions of Approval in the application do nothing to change this inconvenient truth.** There's no evidence that VLI can make their *new* landfill site immune to the effects of the wet climate here any more than they can the existing site, therefore this is an unmitigatable impact and hence grounds for denial.

Respectfully Submitted,

Debbie Palmer
37340 Moss Rock Dr
Corvallis, OR 97330

The Elephant in the Room

ANNUAL CLIMATE DAMAGE

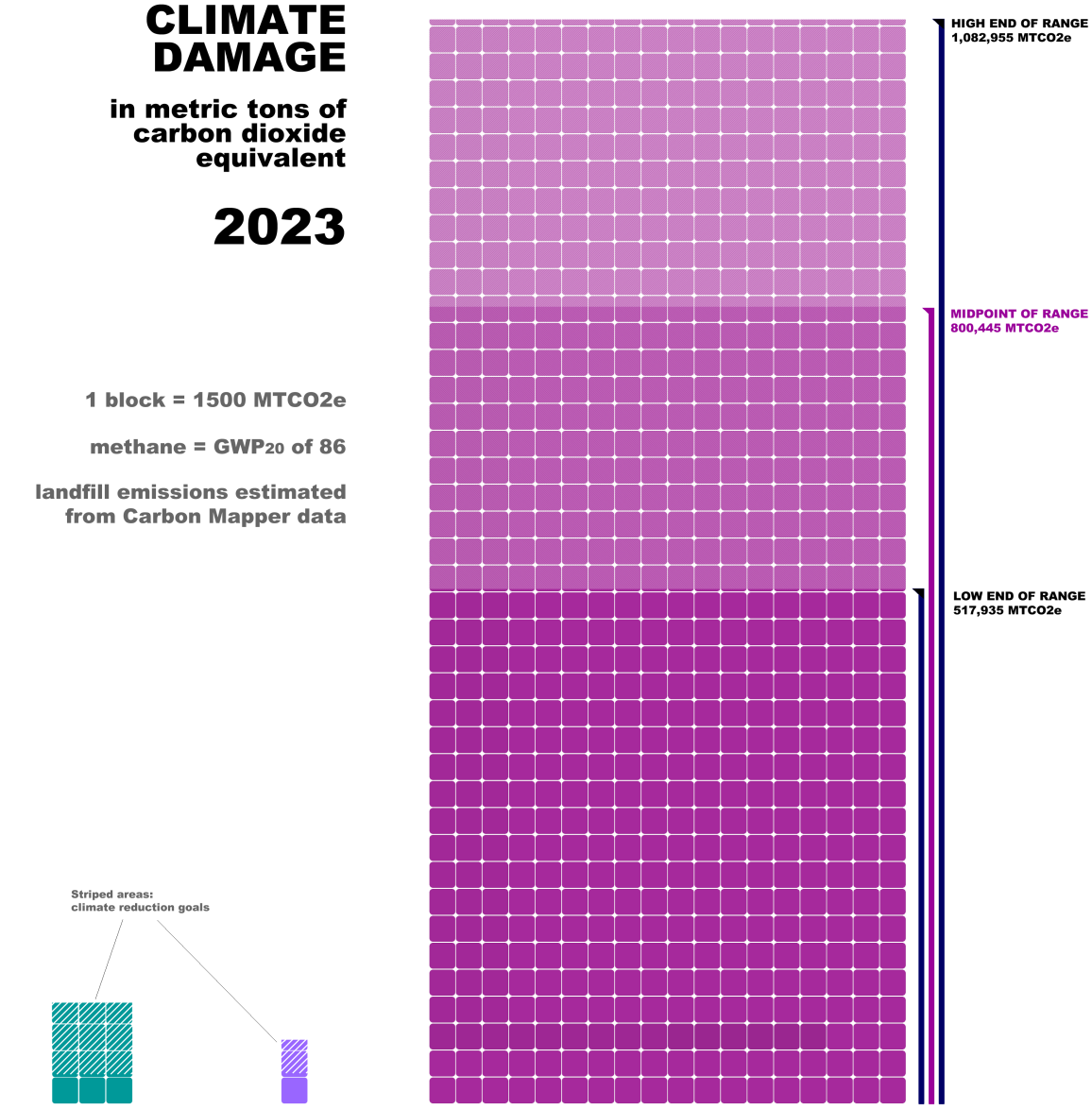
in metric tons of carbon dioxide equivalent

2023

1 block = 1500 MTCO2e

methane = GWP20 of 86

landfill emissions estimated from Carbon Mapper data



Corvallis City Government
17,004 MTCO2e (2022)

Benton County Government
3550 MTCO2e (2022)

Coffin Butte Landfill
800,445 MTCO2e, with confidence interval between 517,935 and 1,082,955 MTCO2e (2023)

All figures are approximations from most recent data available. Methane MTCO2e uses GWP20 = 86

Data sources: greenhouse gas inventories self-published by City of Corvallis (2022), Benton County (2022); striped areas show climate action reduction goals. Carbon Mapper data from aerial surveys (2023).

Carbon Mapper super-emissions from four point sources derived from six remote sensing surveys of 16 methane plumes over a ten-day period in June 2023. Methane quantification by Carbon Mapper: 1.7 metric tons of methane per hour, plus or minus 0.6 metric tons

For simplicity, scenario assigns equal share in output to each point source and varying durations to each: Point Source 1 = 3 months, PS2 = 6 months, PS3 = 9 months, PS4 = 12 months

The Elephant in the Room

ANNUAL CLIMATE DAMAGE

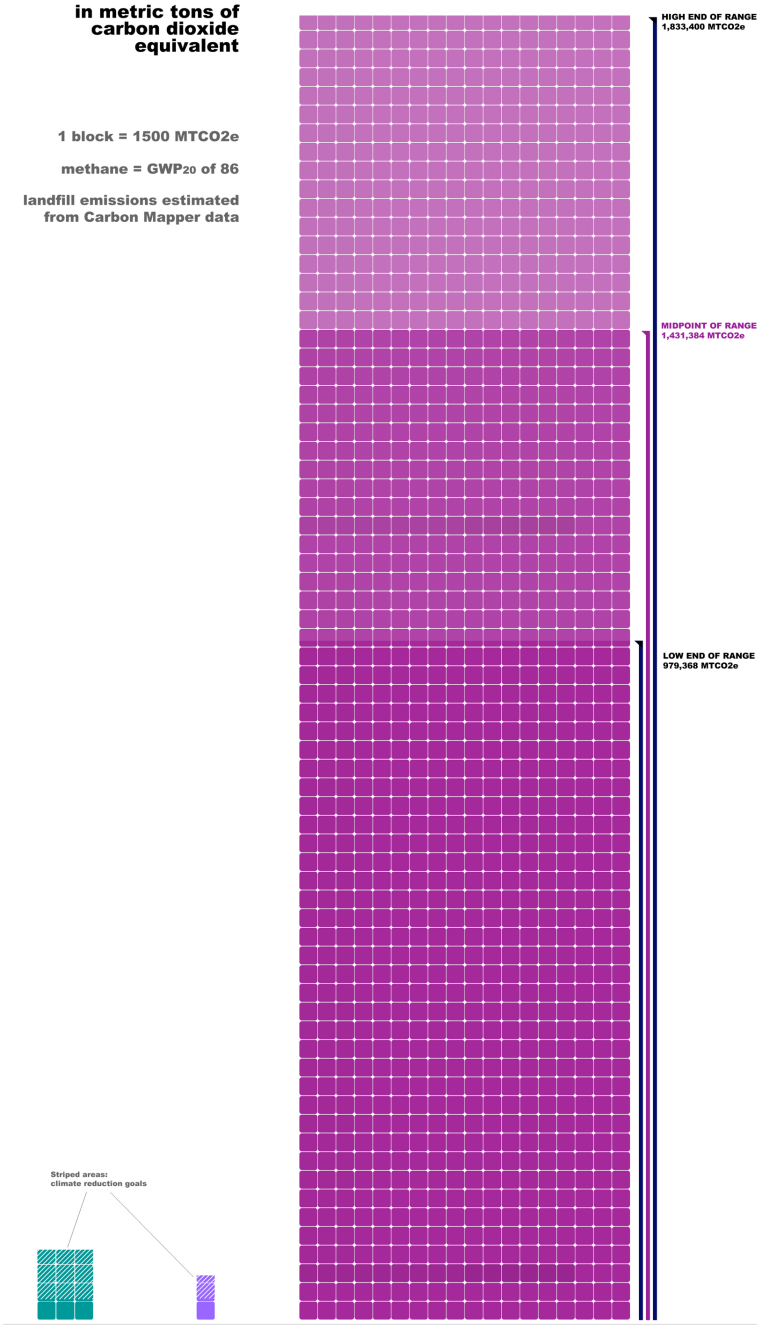
in metric tons of carbon dioxide equivalent

1 block = 1500 MTCO2e

methane = GWP_{20} of 86

landfill emissions estimated from Carbon Mapper data

2025 (est)



Corvallis City Government
17,004 MTCO2e (2022)

Benton County Government
3550 MTCO2e (2022)

Coffin Butte Landfill
1,431,384 MTCO2e, with confidence interval between 979,368 and 1,833,400 MTCO2e (2025)

All figures are approximations from most recent data available. Methane MTCO2e uses GWP_{20} = 86

Data sources: greenhouse gas inventories self-published by City of Corvallis (2022), Benton County (2022); striped areas show climate action reduction goals. Carbon Mapper data from aerial and satellite surveys 2023-25.

2023-5 methane quantification by Carbon Mapper: 1.9 metric tons of methane per hour, plus or minus 0.6 metric tons