

LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment A**  
**Compiled County Engineer Comments on Post-PC Decision Material**

Contents:

- Maul Foster Alongi (MFA) and sub-consultants - October, 2025 engineering comments
- Kellar Engineering – September, 2025 transportation comments

### **Attachment A**

- Maul Foster Alongi (MFA) and sub-consultants - October, 2025 engineering comments





MAUL FOSTER ALONGI

3140 NE Broadway | Portland, OR 97232 | 971 544-2139 | [www.maulfoster.com](http://www.maulfoster.com)

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October 13, 2025

Project No. M0732.02.001

Benton County Community Development Department  
Petra Schuetz, Interim Director  
4500 Research Way  
Corvallis, OR 97333

Sent only electronically to: [petra.schuetz@bentoncountyor.gov](mailto:petra.schuetz@bentoncountyor.gov)

Re: Third-Party Review: Coffin Butte Landfill Submittal – Odor and Sound

Dear Petra Schuetz:

Maul Foster & Alongi, Inc. (MFA) is contracted with Benton County (County) to perform third-party engineering and technical review of the land use application for the proposed Coffin Butte Landfill expansion. This letter provides a summary of our review of the correspondence and exhibits prepared by Valley Landfills, Inc. (Applicant) and submitted to the County in support of their application for a Conditional Use Permit (CUP) to expand the Coffin Butte Landfill. This review is intended to be an assessment of the engineering and other related elements of the submitted documents to establish their adequacy and feasibility for the County to make a land use determination.

## Summary of Review Letters

MFA issued a review letter dated April 17, 2025, summarizing our technical review of Applicant-submitted Exhibits 2, 5, 6, 11–14, 16–18, 20–22, 27–30, and 33.

Following additional information submitted by the applicant on June 6, 2025, MFA issued another review letter on June 23, 2025, specifically addressing our review of Exhibits 36–38, 41, and 44–48. The review comments provided in this letter superseded the previous comments for Exhibit 11 (Noise Study) and Exhibits 12–14 and 33 (related to odor).

This current review letter specifically addresses our requested review of select portions of Exhibit 67 related to odor and sound/noise impacts submitted by the Applicant on September 12, 2025. Note that MFA's review of the groundwater portions of Exhibit 67 is provided in a separate letter also dated October 13, 2025.

## Review of Submitted Exhibits

### Exhibit 67: Appeal of Planning Commission Decision: Responses and Additional Evidence (Portions Related to Odor Impacts)

**Exhibit Description:** A portion of Exhibit 67 includes the Applicant's response to the Planning Commission's findings on odor impacts.

**Findings:** MFA agrees that improving the landfill gas (LFG) collection efficiency will help control LFG emissions and reduce the potential for offsite odors, while implementing enforceable mitigation measures via monitoring will help reduce and/or remedy nuisance conditions offsite. Phased closure of open landfill cells will also reduce the potential for release of odors from the landfill surface.

**Reviewers:** Chad Darby, Brian Snuffer Zukas, PE

## **Exhibit 67: Appeal of Planning Commission Decision: Responses and Additional Evidence (Portions Related to Sound/Noise Impacts)**

**Exhibit Description:** Portions of Exhibit 67 include the Applicant's response to the Planning Commission's findings on sound/noise impacts and refer to Appendix G. Appendix G contains a memorandum dated September 10, 2025 from Adam Jenkins of The Greenbusch Group, Inc. to Jeff Shepherd of Civil & Environmental Consultants, Inc. titled, "Republic Services Coffin Butte Landfill – Construction Noise Assessment" containing updated information related to the Applicants proposed noise mitigation measures during construction.

**Findings:** As previously noted, due to the absence of a noise standard in Benton County code, the Oregon Department of Environmental Quality (DEQ) noise regulations are being utilized by the Applicant and the County as the standard. The DEQ noise rule (OAR 340-035-0035) limits the noise increase to no greater than 10 dB at the noise sensitive property; the applicant has stated that construction noise will not exceed an increase of 5 dB. For blasting, the applicant has predicted blasting related noise to be 10dB less than the allowed limit.

MFA agrees that the evidence provided by the Applicant indicates that the construction noise and blasting levels are expected to comply with more stringent standards than OAR criteria, and ongoing monitoring will allow the County to require improvements if future work fails to maintain sound levels below the OAR standard.

**Reviewers:** Bill Beadie, CIH

## **Summary of Review**

The information presented herein represents the summary of MFA's technical review of a portion of the exhibits submitted by the Applicant in support of their land use request to expand Coffin Butte Landfill.

Please contact MFA if you have any questions or need any additional information regarding this review.

Sincerely,

Maul Foster & Alongi, Inc.



Erik Bakkom, PE  
Principal Engineer

## **Attachment**

Limitations

## Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.



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3140 NE Broadway | Portland, OR 97232 | 971 544-2139 | [www.maulfoster.com](http://www.maulfoster.com)

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October 13, 2025

Project No. M0732.02.001

Benton County Community Development Department  
Petra Schuetz, Interim Director  
4500 Research Way  
Corvallis, OR 97333

Sent only electronically to: [petra.schuetz@bentoncountyor.gov](mailto:petra.schuetz@bentoncountyor.gov)

Re: Third-Party Review: Coffin Butte Landfill Submittal – Groundwater

Dear Petra Schuetz:

Maul Foster & Alongi, Inc. (MFA) is contracted with Benton County (County) to perform third-party engineering and technical review of the land use application for the proposed Coffin Butte Landfill expansion. This letter provides a summary of our review of the correspondence and exhibits prepared by Valley Landfills, Inc. (Applicant) and submitted to the County in support of their application for a Conditional Use Permit (CUP) to expand the Coffin Butte Landfill. This review is intended to be an assessment of the hydrogeologic elements of the submitted documents to establish their adequacy and feasibility for the County to make a land use determination.

## Summary of Review Letters

MFA previously issued review letters dated April 17, 2025 and June 23, 2025, summarizing our technical review of the Applicant-submitted Exhibits as requested by the County.

This current review letter specifically addresses our requested review of select portions of Exhibit 67 related to groundwater impacts submitted by the Applicant on September 12, 2025. Note that MFA's review of the odor and sound/noise related portions of Exhibit 67 is provided in a separate letter also dated October 13, 2025.

## Review of Submitted Exhibits

### Exhibit 67: Appeal of Planning Commission Decision: Responses and Additional Evidence (Portions Related to Groundwater Impacts)

**Exhibit Description:** Portions of Exhibit 67 include the Applicant's response to the Planning Commission's findings on groundwater impacts and refer to Appendices A-C and E. Appendix A contains laboratory analysis from August 2018, Appendix B contains a list of groundwater analytes, Appendix C contains a graph of historical groundwater elevations in/near the proposed expansion area, and Appendix E contains a series of "Groundwater Responses" prepared by John Hower, PG, CEG of Geo-Logic Associates, Inc.

**Findings:** Generally, the items reviewed in Exhibit 67 address two distinct topics, which are groundwater supply and groundwater quality.

### Groundwater Supply

The first topic is questions of groundwater supply, and specific concerns that excavation activities conducted during the construction of the landfill expansion will negatively impact nearby water supply wells.

Based on the information provided by the applicant, as well as publicly available documents and professional judgement, MFA concludes that a preponderance of the evidence demonstrates that excavation in connection with construction is unlikely to seriously interfere with water supply wells on neighboring properties. MFA further concludes that the proposed condition of approval requiring the applicant to conduct a hydrogeologic investigation of the proposed expansion area and install, monitor, and evaluate a system of sentry/monitoring wells to observe groundwater levels before, during, and after construction is a reasonable solution to identify possible impacts on adjacent well levels, and is likely to succeed in preventing serious interference with water supply wells on adjacent properties.

### Groundwater Quality

The second topic reviewed by MFA in Exhibit 67 is questions of groundwater quality and specifically questions of whether elevated arsenic concentrations observed in groundwater downgradient of the existing CBL footprint are the result of leachate releases from the landfill.

MFA has reviewed the applicant's evidence and the responses to the opponents' questions and concludes that potential groundwater impacts from the existing CBL footprint are not an indication that future leachate releases or impacts to groundwater quality are likely to occur at the proposed CBL expansion. The design of the future landfill must be found to be protective of the environment (including groundwater) by meeting or exceeding the minimum design standards of the Oregon DEQ and the United States Environmental Protection Agency, which will be ensured through a design review process with DEQ landfill engineers. MFA also notes that prior to constructing the CBL expansion, an update to the landfill operating permit must be issued by DEQ, and all environmental safeguards must be demonstrated. During landfill operation the evaluation of groundwater data to determine if a release of leachate should be presented in comprehensive annual environmental monitoring reports and submitted to DEQ hydrogeologists, who have the relevant expertise and experience to assess potential impacts to groundwater resulting from landfill operations. DEQ is a state agency with the relevant expertise and experience to assess the engineering design, operating procedures, and groundwater monitoring and protection requirements for the site.

### **Proposed Conditions of Approval:**

Condition 1: At least two years in advance of construction activities, the Applicant shall advance at least four borings to an elevation below the bottom of the neighboring water supply wells and perform a hydrogeologic investigation of the CBL expansion footprint and surrounding vicinity. The results of this investigation should, at a minimum, include the following information:

- Characterization of the locations and depths of any water bearing zones underlying the CBL expansion footprint and neighboring properties.
- Characterization of all fracture zones within the basalt bedrock, including determination of whether each fracture zone is water bearing.
- Characterization of confining or semi-confining layers present between water bearing zones.
- Characterization of static water levels associated with each water bearing zone.
- Identification of which water bearing zone(s) supply water to neighboring property owners.

- Characterization of major aquifer parameters for water bearing zones that have potential to supply groundwater to neighboring properties. This should include hydraulic conductivity and transmissivity.
- Comparison of the locations and depths of the identified water bearing zones relative to the proposed excavation extent and depths.

Condition 2: The Applicant shall use the results of the investigation outlined in Condition 1 to develop a monitoring program to be conducted before, during, and after construction of the CBL expansion. The monitoring program should include, at a minimum, four sentry/monitoring wells screened within the same water bearing zones as the water supply wells on neighboring properties and located between the CBL expansion footprint and the water supply wells. The precise locations and depths of the monitoring wells should be informed by the results of the hydrogeologic investigation described in Condition 1. Static water levels in these wells shall be monitored regularly for a minimum of two years before the start of construction, to establish a robust baseline data set. The Applicant shall submit the baseline water level information data set to document that this Condition has been satisfied. Additionally, the Applicant may demonstrate future compliance with this Condition by providing the County with the DEQ-approved annual groundwater evaluation reports.

Condition 3: The final landfill design shall maintain a minimum of 10 feet of separation between the base of the excavation and any water bearing zone which supplies water to neighboring properties. In the event that this separation cannot be documented, the applicant shall maintain 10 feet of separation above the maximum static water level observed during seasonal wet conditions in the sentry/monitoring wells. Prior to construction, the applicant shall submit a justification for the proposed bottom elevation in the landfill demonstrating that this Condition has been satisfied.

Condition 4: The Applicant shall observe soil conditions during excavation for the presence of upwelling groundwater (not including limited shallow perched groundwater). If groundwater is suspected to be present, the Applicant's hydrogeologist shall prepare an analysis of potential sources and remedies that would allow the construction of the landfill to the proposed bottom elevation; otherwise, applicant shall place necessary backfill to maintain the 10 feet of separation above the static water level that is required in Condition 3. The applicant shall notify the County of construction observations of groundwater and proposed remedies within 2 weeks of initial observance, otherwise a construction summary prepared by the Applicant's Oregon-registered hydrogeologist shall document their conclusion that groundwater was not encountered.

Please contact MFA if you have any questions or need any additional information regarding this review.

Sincerely,

Maul Foster & Alongi, Inc.



Courtney Saviole, RG, PG, LHG  
Senior Hydrogeologist



Erik Bakkom, PE  
Principal Engineer

## Attachment

Limitations

## Limitations

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.



MAUL  
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ALONGI

## **Attachment A**

- Kellar Engineering – September, 2025 transportation comments



**KELLAR ENGINEERING**

September 25, 2025

Coffin Butte Landfill Expansion Traffic Review Comments:

- Kellar Engineering (KE) has reviewed Item BOC1-A0004, Exhibit 67 – Planning Commission Decision Responses and Evidence – Pages 4-6, Commissioner comment responses. KE does not have objections to the comment responses provided in the document.
- Kellar Engineering (KE) has also reviewed the formal response to transportation comments #1 and #2 in a P.E. stamped memorandum (memo) dated August 25, 2025 by Transight Consulting, LLC (Exhibit 67, Pages 42-44). KE does not have objections to the comment responses provided by Transight Consulting, LLC in the memorandum. The responses in the memo follow industry standard methods for traffic impact analysis.

If you have any questions, please do not hesitate to contact me at (970) 219-1602 or [skellar@kellarengineering.com](mailto:skellar@kellarengineering.com).

Respectfully,

Kellar Engineering LLC

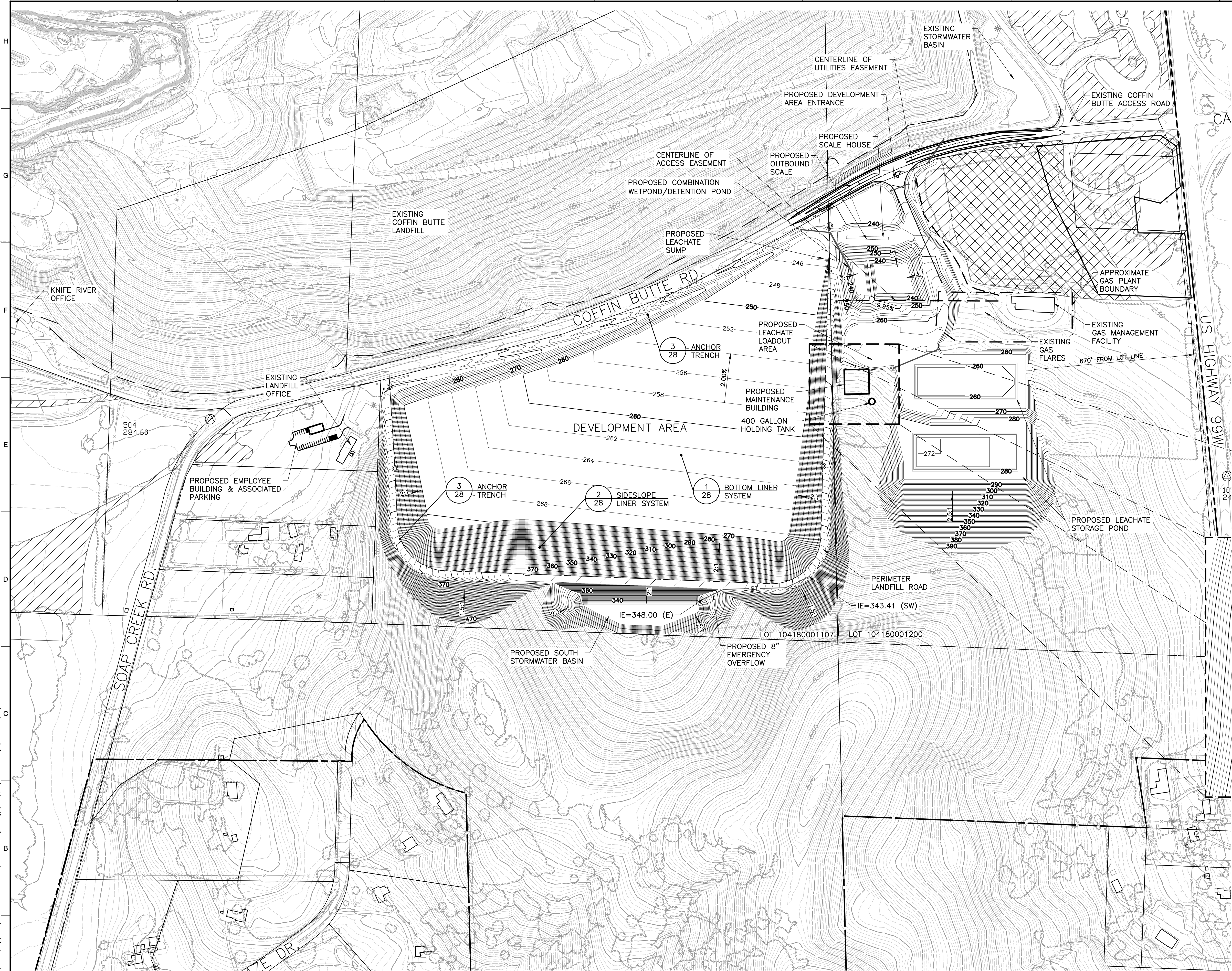


Sean K. Kellar, PE, PTOE

LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment B**  
**COA P1-4 Mitigation Wetland Location**



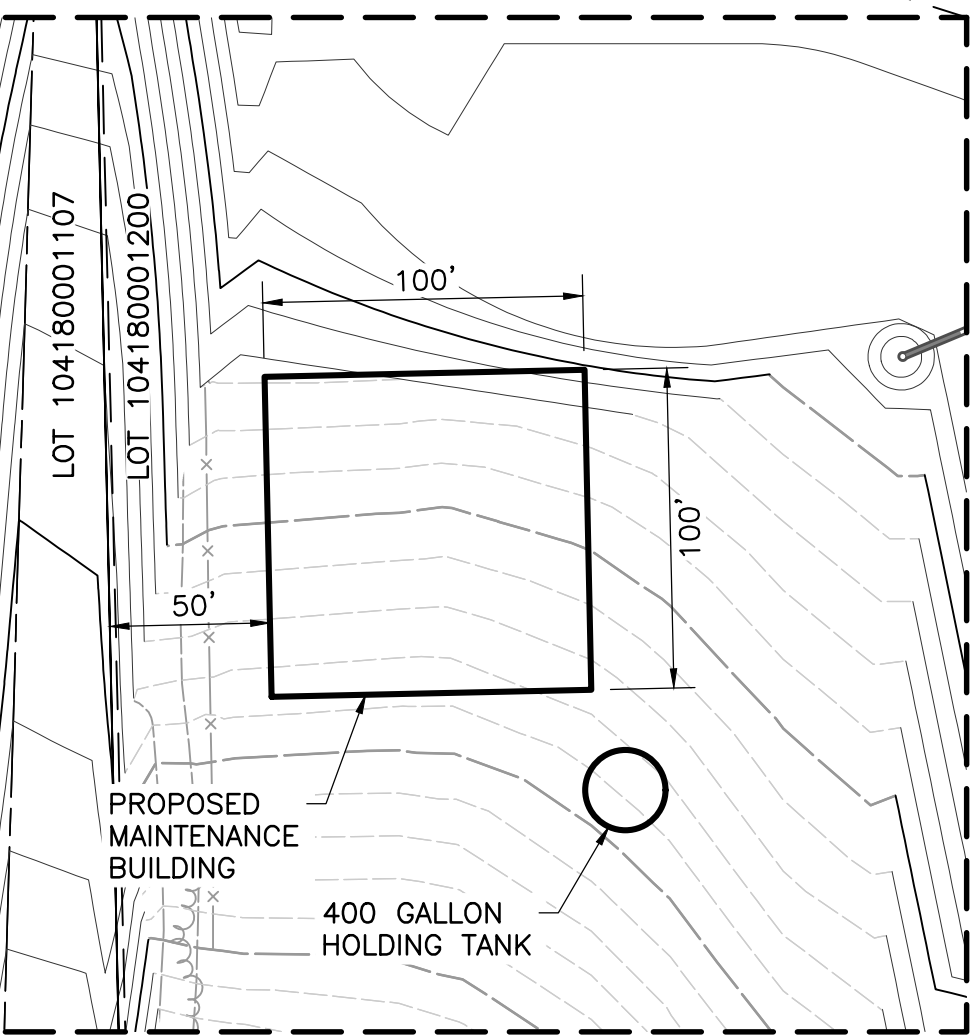


LEGEND

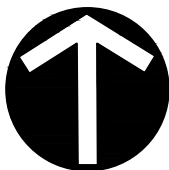
- PROPERTY BOUNDARY
- EXISTING LANDFILL BOUNDARY
- TAX LOT BOUNDARY
- ZONING BOUNDARY
- WETLAND MITIGATION BOUNDARY
- EXISTING 10-FT CONTOUR
- EXISTING 2-FT CONTOUR
- EXISTING PALUSTRINE FORESTED WETLAND
- EXISTING PALUSTRINE EMERGENT WETLAND
- PROPOSED 10-FT CONTOUR
- PROPOSD 2-FT CONTOUR

NOTES

- TAX LOT BOUNDARIES FROM BENTON COUNTY ZONING MAP PANEL 41047C0975G, DATED 01/19/2000 (TAX LOT BOUNDARIES MAY DIFFER FROM ZONING DATED 2021).
- PERIMETER LANDFILL ROAD WILL ONLY BE FOR PICKUP TRUCKS OR SMALLER VEHICLES.



ENLARGED DETAIL  
SCALE: 1"=60'



NORTH



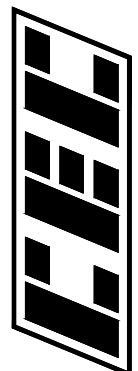
REFERENCE

AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.

SUBMITTAL RECORD

| NO | DATE | DESCRIPTION |
|----|------|-------------|
|    |      |             |
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2356 Gold Meadow Way  
Suite 120  
Gold River, CA 95670  
Ph: 916.503.0050  
www.cecinc.com



Civil & Environmental  
Consultants, Inc.

VALLEY LANDFILLS, INC.  
COFFIN BUTTE LANDFILL  
CONDITIONAL USE PERMIT  
APPLICATION  
CORVALLIS, OR 97330

DEVELOPMENT AREA LAYOUT

DRAWING NO.:

6

|             |              |              |     |
|-------------|--------------|--------------|-----|
| DATE:       | JANUARY 2025 | DRAWN BY:    | JAS |
| DWG SCALE:  | AS SHOWN     | CHECKED BY:  | JAS |
| PROJECT NO: | 322-142      | APPROVED BY: | JAS |



LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment C**  
**COA P2-2(B) Noise Study Table 5.3 and Methodology**

September 25, 2023

Page 8 of 28

Republic Services Coffin Butte Landfill – Noise Study

The range and median hourly  $L_{10}$  and  $L_{50}$  sound levels at each measurement location are shown in Table 5.2 and graphically in the Appendix. It should be noted that due to equipment connectivity issues, some hours of data were incomplete. Levels in this document only include data collected over complete hours. Times when data was not recorded over a complete hour are identified in the Appendix.

**Table 5.2** Measured Hourly Sound Levels, Low-High (Median)

| Measurement Location | Daytime, dBA |            | Nighttime, dBA |            |
|----------------------|--------------|------------|----------------|------------|
|                      | $L_{10}$     | $L_{50}$   | $L_{10}$       | $L_{50}$   |
| Location 1           | 28-54 (39)   | 21-51 (32) | 22-52 (28)     | 15-50 (22) |
| Location 2           | 33-53 (41)   | 30-50 (38) | 27-49 (33)     | 26-48 (29) |
| Location 3           | 53-60 (58)   | 45-56 (53) | 38-59 (50)     | 27-53 (36) |
| Location 4           | 30-55 (46)   | 26-47 (39) | 26-51 (35)     | 24-46 (29) |

Measured median  $L_{10}$  and  $L_{50}$  sound levels were below OAR sound limits at all measurement locations. Dominant sound sources at the measurement locations included birds, other nature sounds, and vehicle traffic on Soap Creek Road, Coffin Butte Road, and Highway 99 West. Sound levels were generally louder at locations closer to Highway 99 West and traffic noise became more prevalent. The existing on-site power plant may have contributed to the measured sound levels at Location 3.

## 5.2 Equipment Sound Levels

Sound levels from existing equipment and operations at the landfill were measured the morning of October 15, 2021, using the Svantek 971 sound level analyzer. Measurements were made of individual pieces of equipment including, excavators, dozers, compactors, tippers, and haul trucks, at distances of 15 feet to 75 feet.

For mobile equipment and equipment not operating continuously, reported sound levels only include the loudest portions of the measurements. Because the data was collected at a variety of distances, measured sound pressure levels were used to compute equipment sound power levels, which are independent of distance. Measurement distances, sound pressure levels, and calculated sound power levels are shown in Table 5.3. A graph showing the frequency spectrum of the equipment is shown in Figure 5.6.

**Table 5.3** Equipment Sound Levels,  $L_{eq}$ 

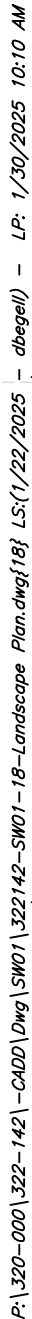
| Equipment                              | Measurement Distance, Feet | Sound Pressure Level, dBA | Sound Power Level, $L_{wA}$ |
|----------------------------------------|----------------------------|---------------------------|-----------------------------|
| CAT D9 Dozer                           | 75                         | 75                        | 110                         |
| CAT D6 Dozer <sup>1</sup>              | 75                         | 80                        | 115                         |
| CAT 836G Compactor                     | 45                         | 81                        | 111                         |
| Columbia Industries Tipper             | 30                         | 90                        | 117                         |
| CAT 330 Excavator                      | 60                         | 68                        | 102                         |
| Idling Trucks                          | 25                         | 70                        | 96                          |
| Trucks Traveling Uphill <sup>2</sup>   | 15                         | 89                        | 110                         |
| Trucks Traveling Downhill <sup>3</sup> | 26                         | 81                        | 108                         |

1. Reported sound levels are the logarithmic average of two measurements
2. Reported sound levels are the logarithmic average of eight measurements
3. Reported sound levels are the logarithmic average of five measurements

LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment D**  
**COA P2-5 Landscape Plan**





|                                                                                     |                                      |
|-------------------------------------------------------------------------------------|--------------------------------------|
|  | PROPERTY BOUNDARY                    |
|  | EXISTING LANDFILL BOUNDARY           |
|  | TAX LOT BOUNDARY                     |
|  | ZONING BOUNDARY                      |
|  | WETLAND MITIGATION BOUNDARY          |
|  | EXISTING 10-FT CONTOUR               |
|  | EXISTING 2-FT CONTOUR                |
|  | EXISTING PALUSTRINE FORESTED WETLAND |
|  | EXISTING PALUSTRINE EMERGENT WETLAND |
|  | PROPOSED 10-FT CONTOUR               |
|  | PROPOSED 2-FT CONTOUR                |
|  | PROPOSED TREES                       |

1. TAX LOT BOUNDARIES FROM BENTON COUNTY ZONING MAP PANEL 41047C0975G, DATED 01/19/2000 (TAX LOT BOUNDARIES MAY DIFFER FROM ZONING DATED 2021).
2. PERIMETER LANDFILL ROAD WILL ONLY BE FOR PICKUP TRUCKS OR SMALLER VEHICLES.

AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM  
AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS  
COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.



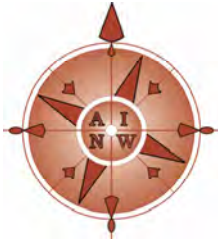
|                       |  |                                                                                                                            |  |                 |  |                                                        |  |                                                                                                     |  |                         |  |
|-----------------------|--|----------------------------------------------------------------------------------------------------------------------------|--|-----------------|--|--------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------|--|-------------------------|--|
| <b>LANDSCAPE PLAN</b> |  | <b>VALLEY LANDFILLS, INC.<br/>COFFIN BUTTE LANDFILL<br/>CONDITIONAL USE PERMIT<br/>APPLICATION<br/>CORVALLIS, OR 97330</b> |  |                 |  | <b>Civil &amp; Environmental<br/>Consultants, Inc.</b> |  | 2356 Gold Meadow Way<br>Suite 120<br>Gold River, CA 95670<br>Ph: 916.503.0050<br><br>www.cecinc.com |  | <b>SUBMITTAL RECORD</b> |  |
| DATE: JANUARY 2025    |  | DRAWN BY: JS                                                                                                               |  | NO.             |  | DATE                                                   |  | DESCRIPTION                                                                                         |  | NO.                     |  |
| DWG SCALE:            |  | AS SHOWN                                                                                                                   |  | CHECKED BY: JAS |  | PROJECT NO: 322-142                                    |  | APPROVED BY: JAS                                                                                    |  | NO.                     |  |
| DRAWING NO.:          |  | 19                                                                                                                         |  | 322-142         |  | 322-142                                                |  | 322-142                                                                                             |  | 322-142                 |  |



LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment E**  
**COA P2-9 Archaeology Report**





# Archaeological Investigations Northwest, Inc.

3510 N.E. 122<sup>nd</sup> Ave. • Portland, Oregon 97230  
Phone (503) 761-6605 • Fax (503) 761-6620

Vancouver Phone (360) 696-7473  
E-mail: [ainw@ainw.com](mailto:ainw@ainw.com)  
Web: [www.ainw.com](http://www.ainw.com)

## MEMO

---

Date: December 19, 2023

To: Jeff Shepherd, P.E., Civil & Environmental Consultants, Inc.

From: Eva Hulse, Ph.D., R.P.A., Senior PM/Senior Geoarchaeologist  
Kristen Heasley, Ph.D., R.P.A., Assistant PM/Supervising Archaeologist

Re: Coffin Butte Landfill Expansion Project  
Benton County, Oregon  
Cultural Resource Survey and Archaeological Testing and Evaluation  
AINW Report No. 5127

Archaeological Investigations Northwest, Inc. (AINW), has conducted a cultural resource survey and archaeological testing and evaluation of 85 acres on behalf of Valley Landfills, Inc., for proposed landfill expansion. The Coffin Butte Landfill Expansion project study involved background review, pedestrian survey, excavation of 76 shovel tests, and excavation of five quarter test units. The survey was conducted to comply with the Oregon State Historic Preservation Office (SHPO) standards, with Benton County land use conditions, and with Section 106, as amended, for the portion of the project that will be subject to review by the U.S. Army Corps of Engineers. A portion of the archaeological shovel testing and all of the quarter test unit excavations were conducted under SHPO permit AP-3341.

As a result of the survey, AINW identified and recorded twelve archaeological resources.

- The project area does not overlap any recorded elements of the former 1941 Camp Adair/Adair Air Force Station, and no archaeological deposits pertaining to the Camp Adair site were encountered. No historic-period buildings or structures are within the project area.
- There are eight pre-contact (Native American) isolates consisting of between one and nine artifacts.
- There are two multi-component isolates with both historic-period and pre-contact artifacts. The sparse historic-age artifacts are from casual debris disposal, as well as from municipal compost spread in portions of the project area.
- There are two pre-contact archaeological sites composed primarily of stone fragments that were left behind when Native people made stone tools.

AINW excavated quarter test units at the two archaeological sites to evaluate their significance and integrity. The archaeological findings suggest that the area was used as long as 3,000 years ago by Native people, for making stone tools and possibly for plant gathering.

December 19, 2023

Page 2

Jeff Shepherd, Civil &amp; Environmental Consultants, Inc.

Coffin Butte Landfill Expansion Project

Cultural Resource Survey and Archaeological Testing and Evaluation

AINW Report No. 5127

**Project Recommendations**

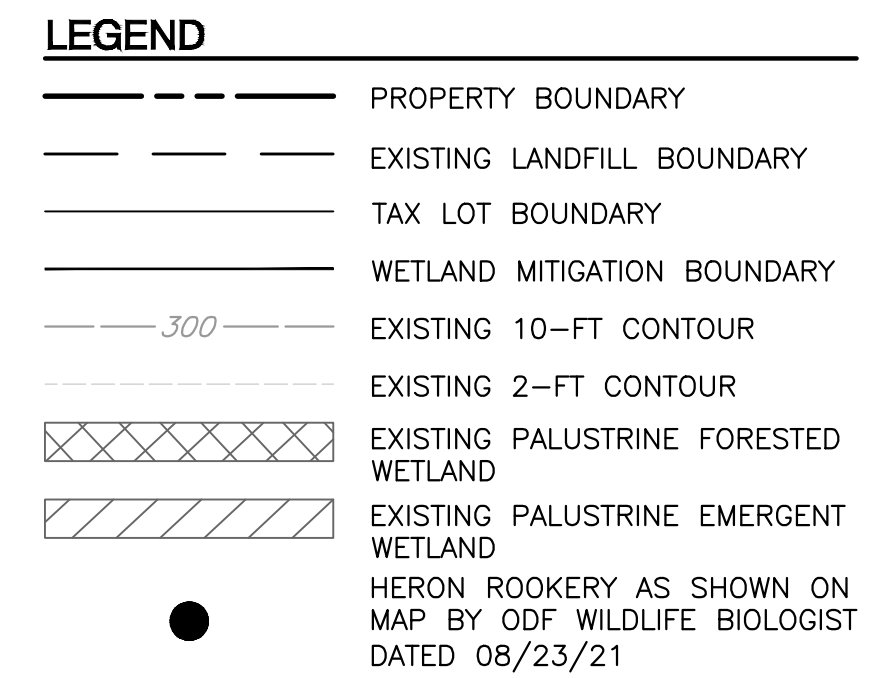
AINW recommends a finding of No Adverse Effect on Historic Properties as long as conditions are met.

- AINW recommends that the 10 isolates identified during survey are not eligible for listing in the National Register of Historic Places (NRHP), and no further work is needed at those locations.
- AINW's excavations found that one of the archaeological sites is disturbed and lacks integrity, and AINW recommends that it is not eligible for listing in the NRHP. Inadvertent discoveries are likely at this location, and AINW recommends construction monitoring to the depth of the archaeological deposit, which is up to 20 inches (in) below the surface.
- AINW's excavations found that the other archaeological site is disturbed to a depth of 12 in, below which are artifacts in intact soil. The portion of the archaeological site below 12 in is eligible for listing in the NRHP due to its potential to retain important information about the past. AINW recommends that the project avoid grading below a depth of 12 in below the surface at this location. AINW recommends monitoring of organic topsoil grading at this location to the depth of project impacts, which is anticipated to a depth of 12 in below the current surface.
- AINW recommends that a monitoring plan and Inadvertent Discovery Plan be developed for the project.
- AINW recommends that graded archaeological soils not be taken offsite for disposal, to avoid creation of a new archaeological deposit at another location.

LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment F**  
**COA OP-2(E) Approved Site Plans**





SCALE IN FEET

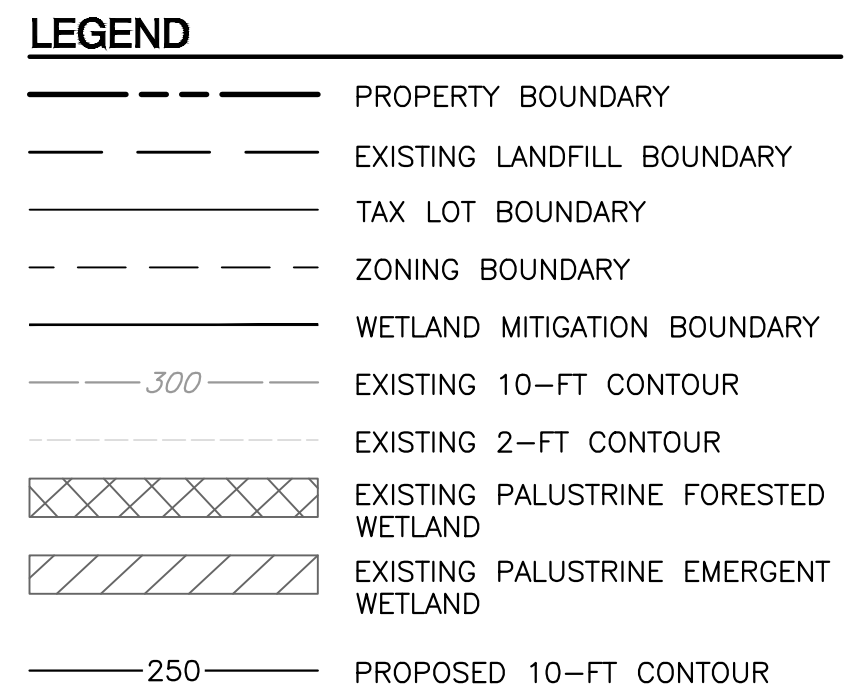


0 400 800



DRAWING NO.:  
**4**



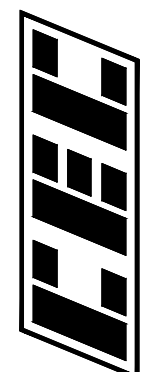


1. TAX LOT BOUNDARIES FROM BENTON COUNTY ZONING MAP PANEL 41047C0975G, DATED 01/19/2000 (TAX LOT BOUNDARIES MAY DIFFER FROM ZONING DATED 2021).

AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM  
AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS  
COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.

[illegible]

2356 Gold Meadow Way  
Suite 120  
Gold River, CA 95670  
Ph: 916.503.0050  
[www.cecinc.com](http://www.cecinc.com)



Civil & Environmental  
Consultants, Inc.

**VALLEY LANDFILLS, INC.  
COFFIN BUTTE LANDFILL  
CONDITIONAL USE PERMIT  
APPLICATION  
CORVALLIS, OR 97330**

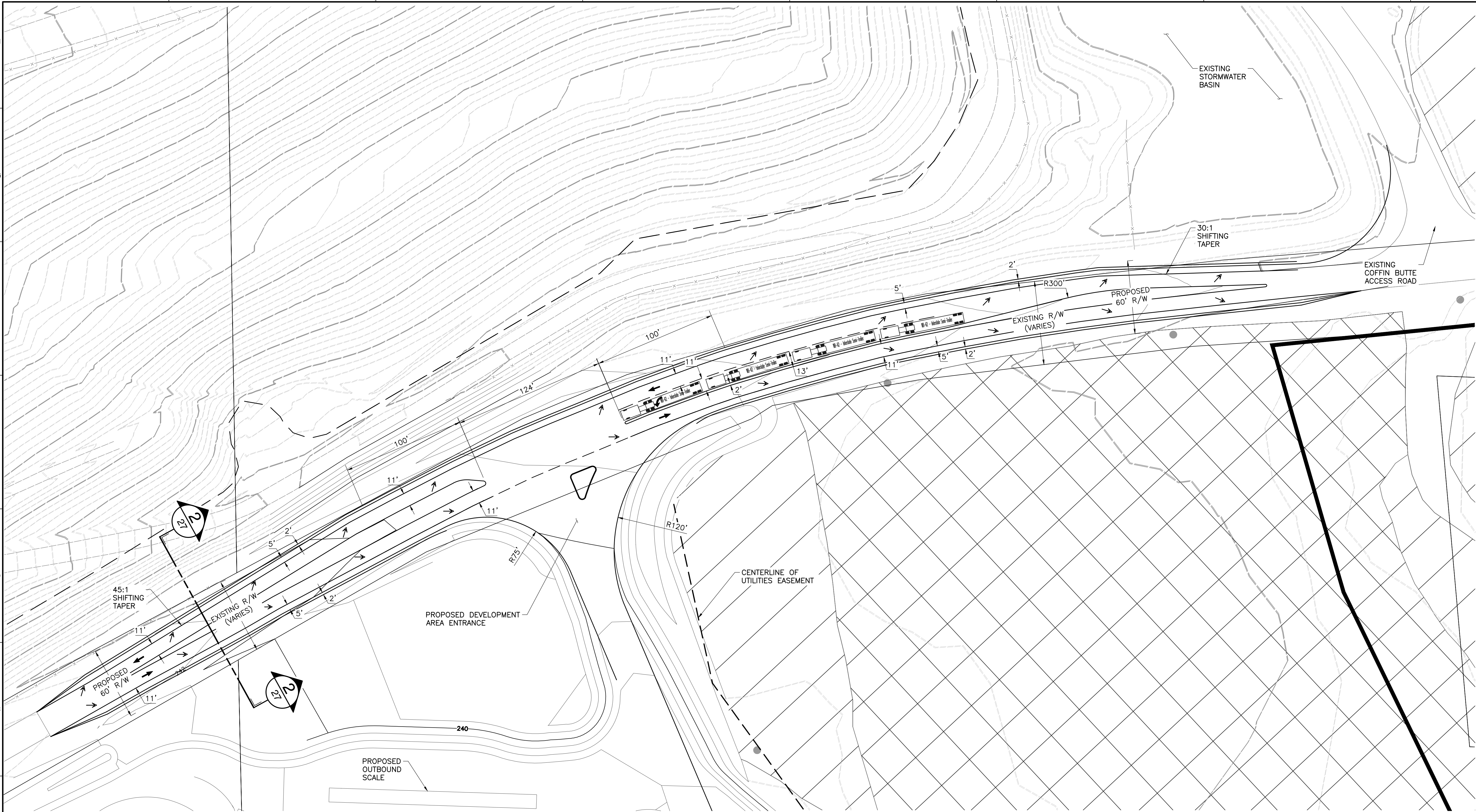
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| OVERALL DEVELOPMENT PLAN |              | J5          |
| DATE:                    | JANUARY 2025 | DRAWN BY:   |
| DWG SCALE:               | AS SHOWN     | CHECKED BY: |
| PROJECT NO:              |              | 322-142     |
| APPROVED BY:             |              | JAS         |

DRAWING NO.:

5



P:\320-0001\322-142\322-142\000\Drawings\SW01\322142-SW01-7-Left Turn Traffic Plan.dwg[8] LSC(1/20/2025 10:05 AM) - LP: 1/20/2025 10:05 AM

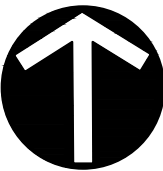


NOTES

1. LEFT TURN CHANNELIZATION BASED ON STATE OF OREGON DEPARTMENT OF TRANSPORTATION HIGHWAY DESIGN MANUAL FIGURE 8-9 FOR A DESIGN SPEED OF 40 MPH.
2. THE ADDITIONAL IMPERVIOUS AREA ADDED DUE TO THE ROAD WIDENING WILL BE APPROXIMATELY 0.65 ACRES.
3. STORMWATER RUNOFF WILL BE CAPTURED IN DRAINAGE CHANNELS OR CULVERT PIPES AND DIRECTED TO THE EXISTING STORMWATER BASIN ON NORTHWEST CORNER OF COFFIN BUTTE ROAD AND THE ENTRANCE TO COFFIN BUTTE LANDFILL.

LEGEND

- PROPERTY BOUNDARY
- EXISTING LANDFILL BOUNDARY
- TAX LOT BOUNDARY
- ZONING BOUNDARY
- WETLAND MITIGATION BOUNDARY
- EXISTING 10-FT CONTOUR
- EXISTING 2-FT CONTOUR
- EXISTING PALUSTRINE FORESTED WETLAND
- EXISTING PALUSTRINE EMERGENT WETLAND
- PROPOSED 10-FT CONTOUR
- PROPOSED 2-FT CONTOUR



NORTH



REFERENCE

AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.



LEFT TURN TRAFFIC PLAN

DRAWING NO.:

8

VALLEY LANDFILLS, INC.  
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CONDITIONAL USE PERMIT  
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CORVALLIS, OR 97330

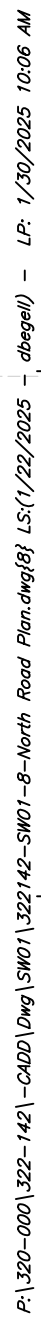


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SUBMITTAL RECORD

| NO. | DATE | DESCRIPTION |
|-----|------|-------------|
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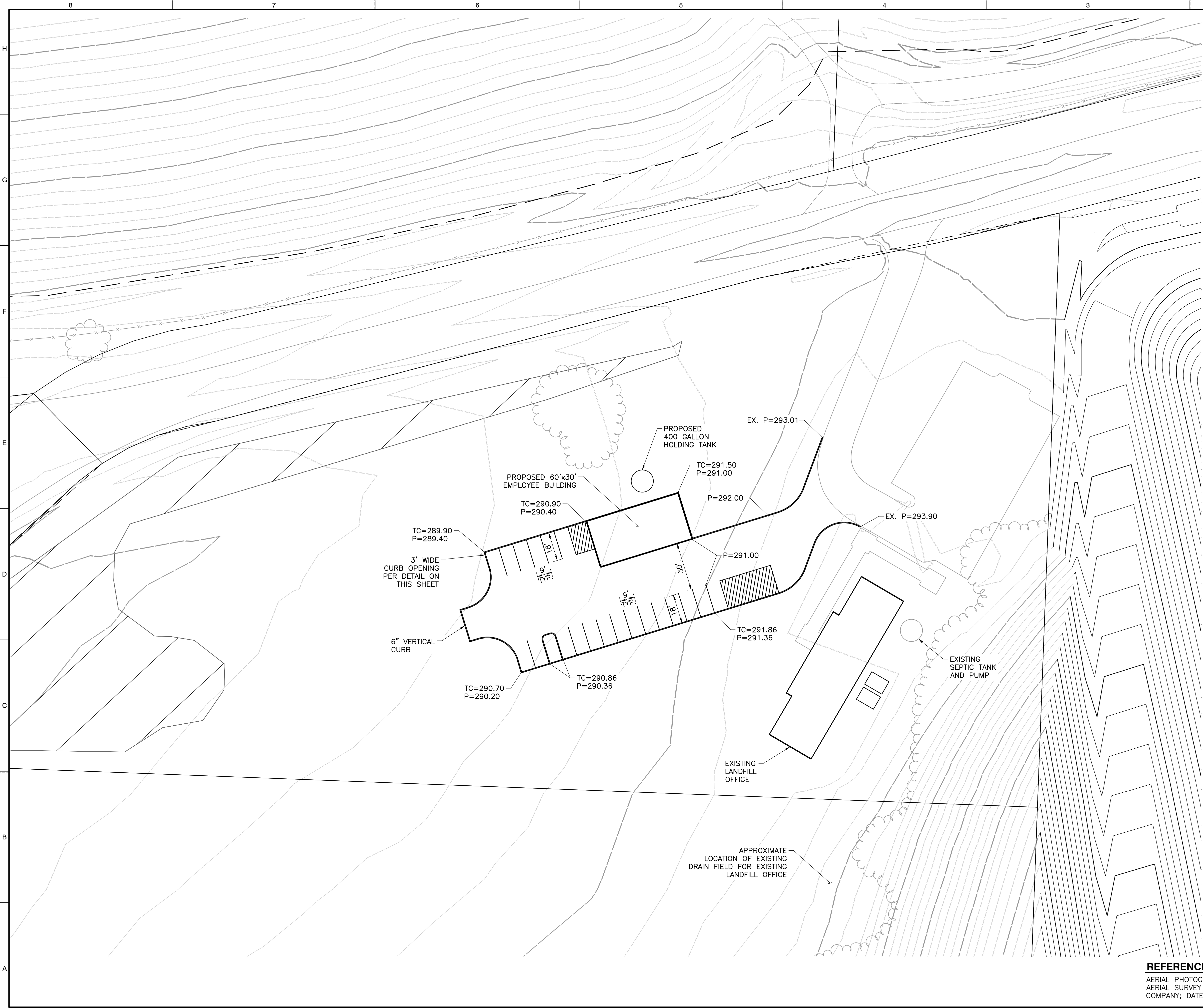


REGISTERED PROFESSIONAL  
ENGINEER  
92360PE  
OREGON  
JULY 13, 2017  
JEFF A. SHEPHERD  
EXPIRES: 06/30/2026

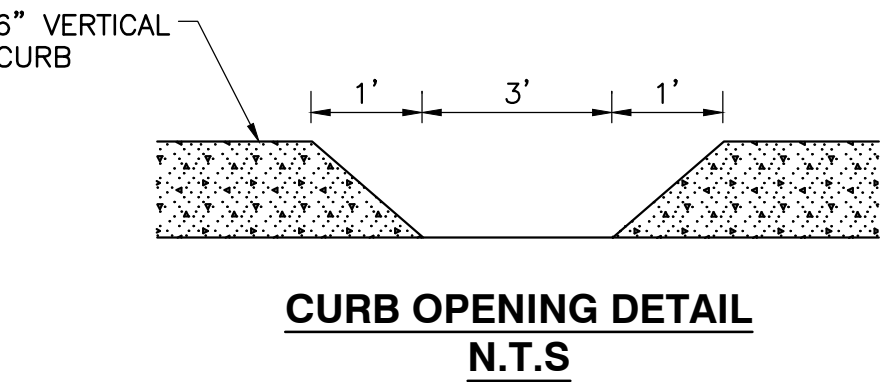
9



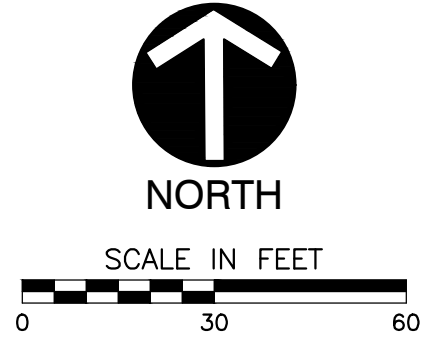
P:\130-000\132-142-CADD\DWG\SW01\322142-SW01-9-Parking Infrastructure Plan.dwg(5) LS(1/22/2025 - dimgall) - LP: 1/30/2025 10:06 AM



| LEGEND |                                      |
|--------|--------------------------------------|
|        | PROPERTY BOUNDARY                    |
|        | EXISTING LANDFILL BOUNDARY           |
|        | TAX LOT BOUNDARY                     |
|        | ZONING BOUNDARY                      |
|        | WETLAND MITIGATION BOUNDARY          |
|        | EXISTING 10-FT CONTOUR               |
|        | EXISTING 2-FT CONTOUR                |
|        | EXISTING PALUSTRINE FORESTED WETLAND |
|        | EXISTING PALUSTRINE EMERGENT WETLAND |
|        | PROPOSED 10-FT CONTOUR               |
|        | PROPOSD 2-FT CONTOUR                 |



- NOTE**
1. PROPOSED HOLDING TANK TO BE PUMPED AS REQUIRED.
  2. POTABLE WATER WILL BE OBTAINED FROM ON-SITE WATER WELL.
  3. APPROXIMATELY 30 PEOPLE WILL BE USING THE LOCKER ROOM.
  4. PROPOSED HOLDING TANK WILL BE DESIGNED IN ACCORDANCE WITH BENTON COUNTY OREGON REGULATIONS AT THE TIME WHEN A BUILDING / PLUMBING PERMIT IS OBTAINED FOR THE PROPOSED EMPLOYEE BUILDING.



**REFERENCE**  
AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.

|                         |      |             |  |
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| <b>SUBMITTAL RECORD</b> |      | DESCRIPTION |  |
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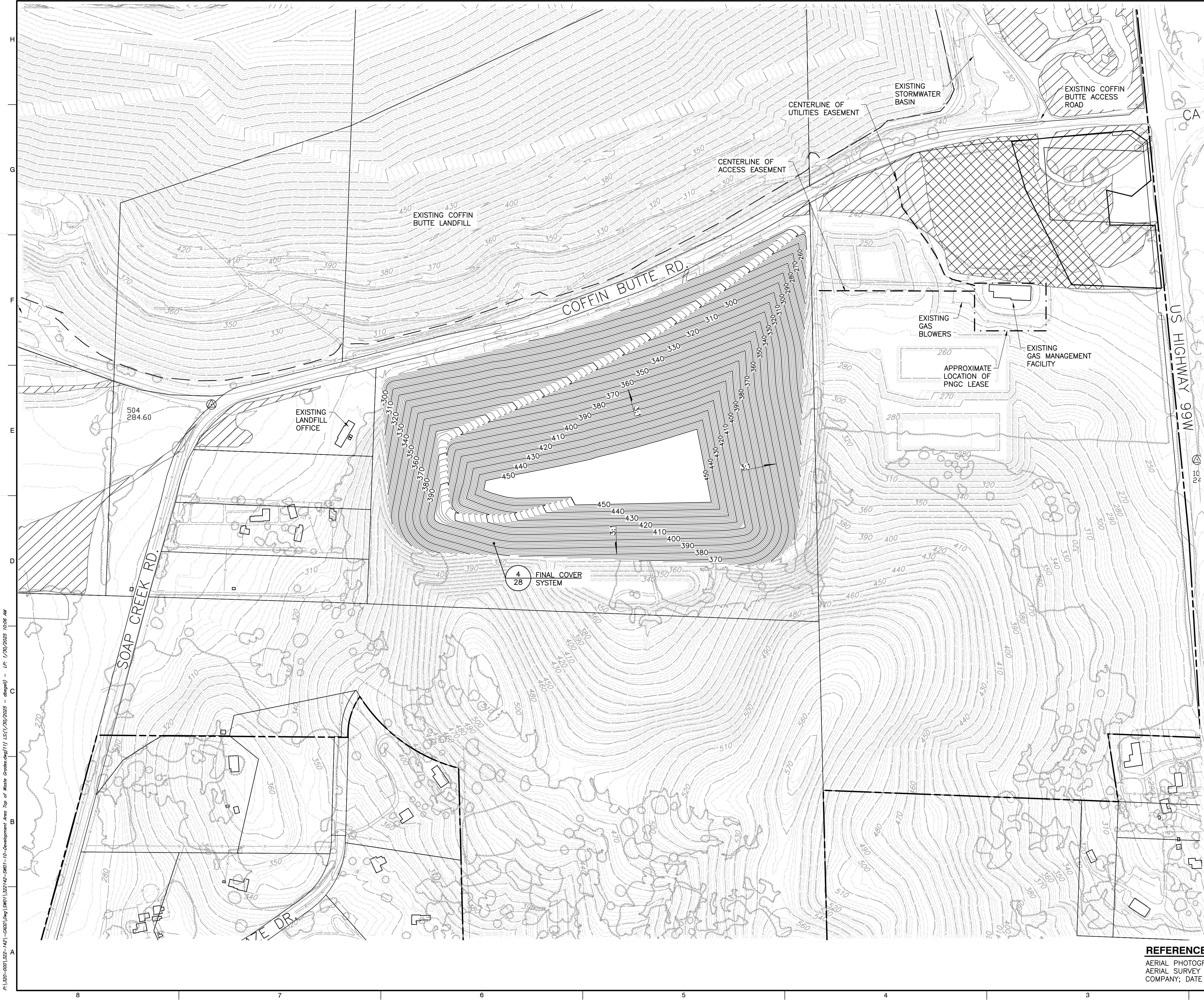
**VALLEY LANDFILLS, INC.**  
**COFFIN BUTTE LANDFILL**  
**CONDITIONAL USE PERMIT APPLICATION**  
**CORVALLIS, OR 97330**

|                                    |  |                     |                  |
|------------------------------------|--|---------------------|------------------|
| <b>PARKING INFRASTRUCTURE PLAN</b> |  | DATE: JANUARY 2025  | DRAWN BY: JS     |
|                                    |  | DWG SCALE: AS SHOWN | CHECKED BY: JAS  |
|                                    |  | PROJECT NO: 322-142 | APPROVED BY: JAS |

DRAWING NO: **10**

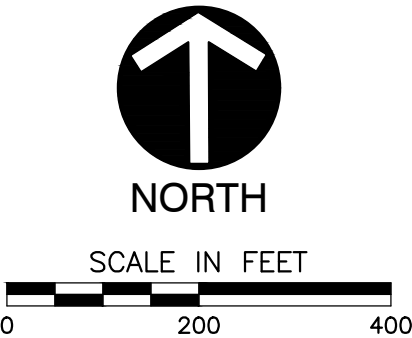


P:\120-000\122-142-CADD\DWG\DWG\122142-2001-0-Development Area Top of Waste Grades.dwg[1] LS(1/30/2025 - 09:40) - LP: 1/30/2025 10:08 AM



| LEGEND |                                      |
|--------|--------------------------------------|
|        | PROPERTY BOUNDARY                    |
|        | EXISTING LANDFILL BOUNDARY           |
|        | TAX LOT BOUNDARY                     |
|        | WETLAND MITIGATION BOUNDARY          |
|        | EXISTING 10-FT CONTOUR               |
|        | EXISTING 2-FT CONTOUR                |
|        | EXISTING PALUSTRINE FORESTED WETLAND |
|        | EXISTING PALUSTRINE EMERGENT WETLAND |
|        | PROPOSED 10-FT TOP OF WASTE CONTOUR  |
|        | PROPOSD 2-FT TOP OF CONTOUR          |

- NOTES**
- TAX LOT BOUNDARIES FROM BENTON COUNTY ZONING MAP PANEL 41047C0975G, DATED 01/19/2000 (TAX LOT BOUNDARIES MAY DIFFER FROM ZONING DATED 2021).
  - PERIMETER LANDFILL ROAD WILL ONLY BE FOR PICKUP TRUCKS OR SMALLER VEHICLES.



**REFERENCE**  
AERIAL PHOTOGRAPH, TOPOGRAPHIC INFORMATION FROM AERIAL SURVEY AND GRID BY COOPER AERIAL SURVEYS COMPANY; DATE OF PHOTOGRAPHY: OCTOBER 07, 2021.



| SUBMITTAL RECORD |      |
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**VALLEY LANDFILLS, INC.  
COFFIN BUTTE LANDFILL  
CONDITIONAL USE PERMIT  
APPLICATION  
CORVALLIS, OR 97330**

| DEVELOPMENT AREA<br>TOP OF WASTE GRADES |                  |
|-----------------------------------------|------------------|
| DATE: JANUARY 2025                      | DRAWN BY: JS     |
| DWG SCALE: AS SHOWN                     | CHECKED BY: JAS  |
| PROJECT NO: 322-142                     | APPROVED BY: JAS |
| DRAWING NO.: <b>11</b>                  |                  |



LU-24-027 Staff Report to Benton County Board of Commissioners

**Attachment G**  
**COA OP-9(A) Litter Control Measures**



**Jeffrey G. Condit**  
Partner  
Jeff.Condit@millernash.com  
503.205.2305 (direct)

June 20, 2025

Benton County Planning Commission  
c/o Petra Schuetz, Community Development Director  
Benton County Community Development  
4500 SW Research Way  
Corvallis, OR 97330-1139

Subject: File No. LU-24-027

Dear Benton County Planning Commission:

We represent Valley Landfills, Inc., the Applicant for above-referenced conditional use permit. There were several issues raised in testimony that we did not directly address in our prior testimony.

**Litter Impacting Farm Use.** In an April 28, 2025, email from Ryan Wilson, who has a ranching operation at 28903 Tampico Road states that he has seen an increase in air-blown trash coming from the landfill, including Styrofoam, plastic bags, and metallic chip bags that could kill his cattle and other area livestock if they were to eat them.

At the threshold, we note that Mr. Wilson's operation is located along Tampico Road, relatively far south of the existing landfill. Mr. Wilson's operation is south of Tampico Ridge, and there are trees between the landfill and his operation. Given the geography, there is a question as to how much debris making its way to Mr. Wilson's operation is actually from the landfill. Nevertheless, as litter has been raised as a concern and Applicant's aim is to always be a conscientious neighbor, Applicant notes that it employs the following litter control measures:

- To catch litter before it becomes airborne, Coffin Butte Landfill deploys portable "Bull Fencing." (First picture below.) This type of fencing is moved with heavy equipment and is placed next to the working face. The landfill also places wire fencing along the main haul road that is reinforced with orange snow fence. (Second picture below). A third line of defense is the main chain link fence around the landfill property.



Benton County Planning Commission  
June 20, 2025  
Page 2



- The landfill also utilizes approximately 5 temporary labor workers every day. These temporary laborers pick litter inside and outside of the landfill and place the litter in garbage bags that are picked up at the end of the day.
- In addition, the landfill has a contract with the Benton County Sheriff's Department employing work crews to pick up litter along highway 99 and the Camp Adair Road from the landfill to Independence highway twice per month.
- As the working face grows throughout the day, heavy equipment operators place daily cover on the slopes to minimize the amount of exposed waste, which is one of the most effective ways to prevent blowing litter. When the landfill personnel notice that the wind is beginning to pick up, Applicant endeavors to reduce the working area to reduce the potential of windblown debris.

Benton County Planning Commission  
June 20, 2025  
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In addition to a condition requiring the Applicant maintain at least the same level of litter control measures with regard to the expansion as outlined above, we propose to add a secondary line of bull fencing behind the existing line and expand the litter collection activities to include Tampico and Soap Creek Roads. Finally, Landfill personnel continue to assess where additional fencing can be placed to minimize off-site litter and will install Defender Fencing where appropriate. (Third picture below.)



The measures will limit the amount of litter leaving the landfill so that it does not “seriously interfere with uses on adjacent property,” or “force a significant change or significantly increase the cost of accepted farm and forest practices on agriculture or forest lands” within the meaning of the applicable criteria.

**Odor.** Please see attached brief memorandum from SCS Engineers dated June 20, 2025 (Applicant’s Exhibit 51), which provides some further context and information on the results of the June 6, 2025, update to the Coffin Butte Landfill 2024 Expansion Application Odor Dispersion Modeling Study (“June 2025 Model”).

**Impact of relocated leachate ponds on surrounding farm and forest uses.** Some testimony expressed concern that the leachate ponds, which are proposed for relocation from the LS zone to the FC Zone, could leak leachate into the groundwater and “force a significant change or significantly increase the cost of accepted farm and forest practices on agriculture or forest lands.”



Benton County Planning Commission  
June 20, 2025  
Page 4



The liner system for the new leachate storage ponds will be similar if not identical to the liner system that is being used in the current leachate storage ponds. This will include a leachate detection layer that is below the primary liner system. This liner system is regulated by the ODEQ and the leachate detection system is required to be monitored semi-annually. Based on our required monitoring of the existing leachate storage ponds, we do not have records of a leak detected during the time the existing ponds have been in operation. And, as explained in submissions from Geo-Logic Associates, Inc. and Tuppan Consultants LLC, there has been no evidence of a release to groundwater from portions of the Coffin Butte Landfill equipped with composite liner systems. Applicant would be glad to provide the results of the semi-annual monitoring to the County as a condition of approval.

The relocated leachate ponds will have no impact on surrounding farm and forest uses.

Thank you for your consideration.

Very truly yours,

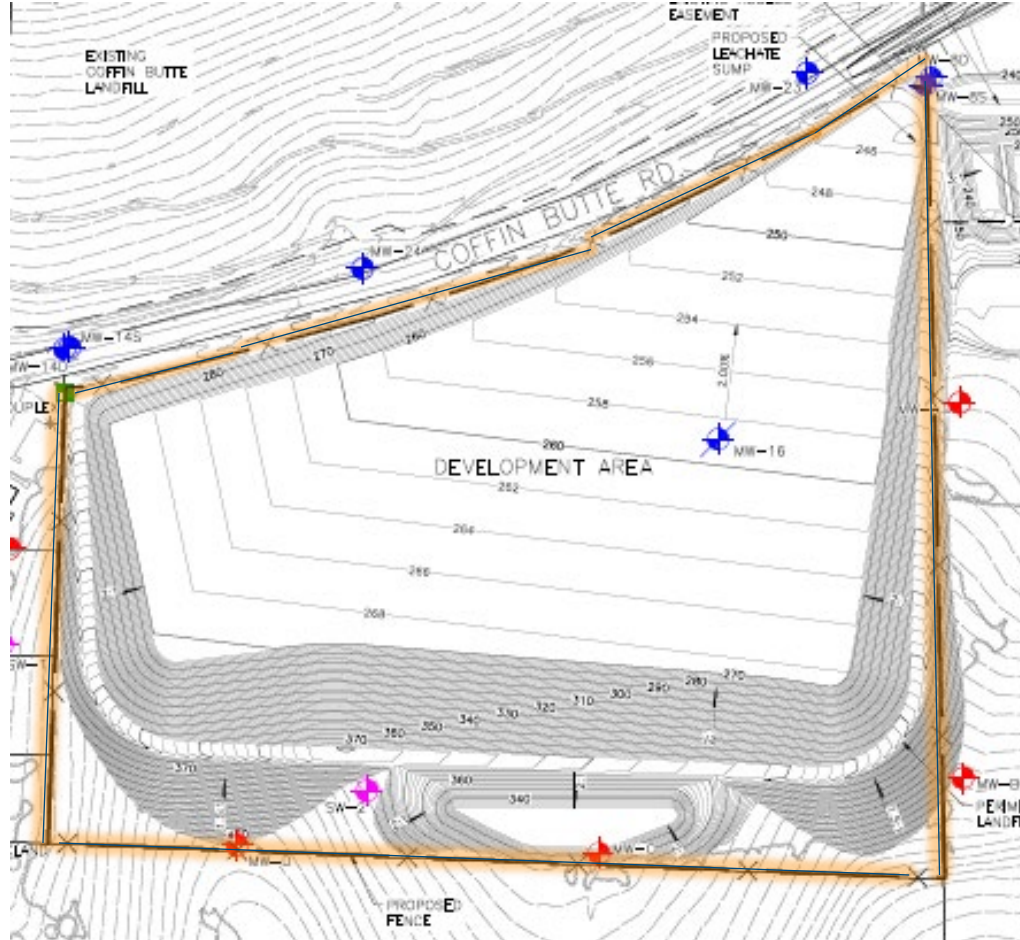
A handwritten signature in blue ink, appearing to read 'JG Condit', written over a light blue horizontal line.

Jeffrey G. Condit

LU-24-027 Staff Report to Benton County Board of Commissioners

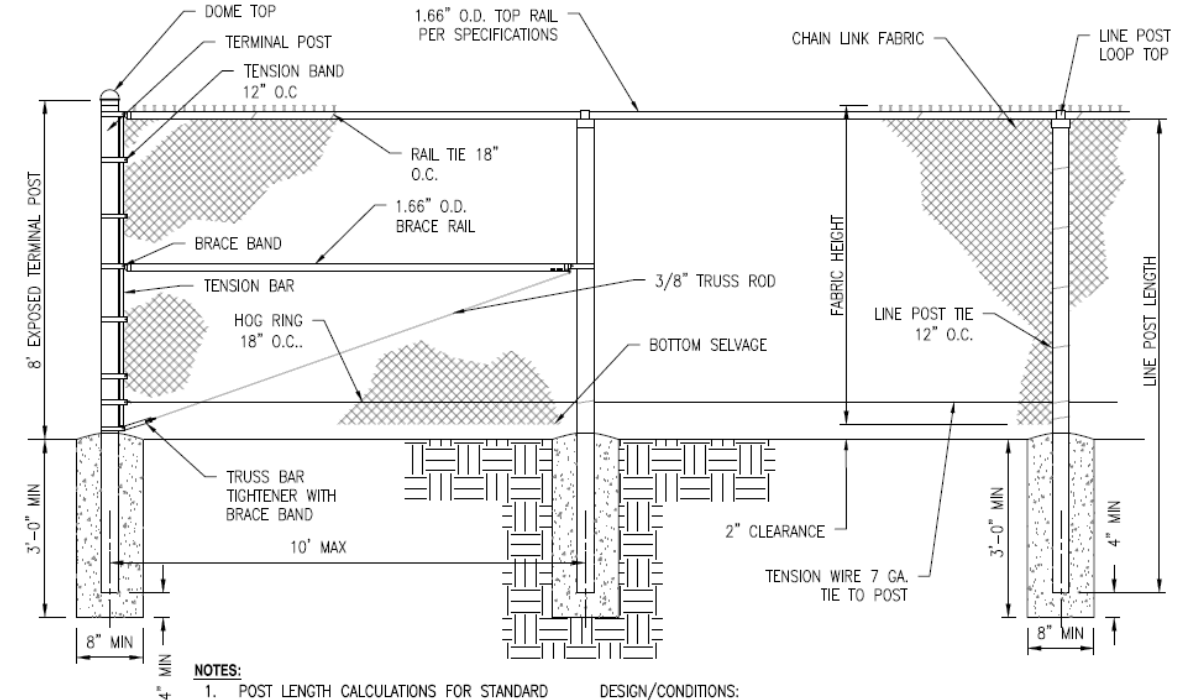
**Attachment H**  
**COA OP-9(E) Litter Control Fence Location**





## Fence Located Around Expansion Parcel

- Effective in catching windblown litter.
- Avoids litter encroachment on Forestry Conservation areas.
- Reduces impact on wildlife migration.



**NOTES:**

1. POST LENGTH CALCULATIONS FOR STANDARD  
LINE POSTS=FABRIC HEIGHT+2'8"  
TERMINAL POSTS=FABRIC HEIGHT+3'-0"
2. FOOTINGS: DIAMETER (4X) POST DIAMETER, MIN. DEPTH=3'-0"

**DESIGN/CONDITIONS:**