From: kiko denzer
To: Coffin Butte Landfill Appeals
Subject: Uphold Planning Commission Denial of LU-24-027
Date: Tuesday, September 9, 2025 9:16:08 PM

To: Benton County Commissioners Wyse, Malone and Shepherd,
landfillappeals@bentoncountyor.gov

Subject: Uphold Planning Commission Denial of LU-24-027

Dear Benton County Commissioners Wyse, Malone and Shepherd,

My name is Kiko Denzer; I live at 928 n. 9th in Philomath, and have lived in the area for the past 30 years.

I strongly oppose expansion of the Coffin Butte landfill and urge you to uphold your Planning Commission's unanimous denial of this application.

Expansion would destroy the character of the area and impose an ever-expanding burden on public resources. It would also violate Benton County Code 53.215 (1) and (2) and does nothing to align with Benton County's 2040 Thriving Communities Initiative. Indeed, it outright denies our goals for responsible environmental stewardship, public health, and sustainable waste management.

The dump impacts so many lives: people, animals, birds, trees, plants, and the billions of microscopic critters in the soil, who feed all the others, and who are so vulnerable to the toxins we knowingly and unknowingly put into the ground. And all of us depend on each other for our survival.

Since the dump opened in the 40s, it has gone from a small local business to $16 billion dollar publicly traded industry, the second largest of it's kind in the US. And now, because of all the negative impacts of the business, neighboring landowners have had property sales fall thru, and new people don't want to move there. The dump itself has become the character of the place, and the current operator wants to expand.

Currently, 1/3 of Oregon residents send their waste here; what happens? Flocks of birds show up to eat food scraps and then go to local berry farms for dessert, where they eat up farmers thin profit margins. Local hunters get what they call "dump deer," because of their diseased livers and poor health. Local residents find their wells full of arsenic. And on the "dump days" when the stench is too bad, they can't even go outside. The enormous quantity of methane that isn't (and can't) be captured not only escapes into the air, where it harms the health of residents and contributes massively to global warming, but also poses an enormous fire risk to the whole region.

Then there are PFAS, the so-called "forever chemicals," that all our winter rains leach out of the mountain of trash. What happens to them? We don't even know how much of it goes into the ground water thru an only partially lined facility. Then there are the millions of

gallons that Republic does manage to capture, but which they send in tanker trucks to facilities that can't remove the PFAS. What happens to those toxins? They either get dumped into the Willamette or they're added to sewage. Sewage processing likely concentrates the toxins, which then end up as material that, in other places, has so poisoned the soil that state health departments have forced farmers out of business entirely (see the article copied below about a Michigan farmer who lost his livelihood due to PFAS from PFAS contaminated biosolids).

But Republic Services just wants to bring in more trash…

And the Planning Commission has, already, denied the application, in a unanimous decision. If the Board of Commissioners overturns that decision, it will be a clear message to every resident of Benton County that "government of the people, by the people, for the people" is indeed perishing from the earth, and being disappeared under a mountain of trash.

In addition, the county's "process" has apparently nullified the information on which the planning commission based their decision and Republic Services is pouring money into this "process" as if there's no tomorrow. Why?

As Marge Popp recently pointed out in the G.T. (I'm copying the text of her article below), perhaps they're doing it because Coffin Butte is Republic's only foothold in the PNW, and it's cheaper for them to pay a PR firm to try and sway the County's decision than it would be to open a dump in a place that would cause less harm — much less re-design their waste management strategies to actually address county code and environmental goals (which the county spelled out years ago, but which seem to have been ignored ever since…conveniently for RS…and at enormous expense for citizens, who will have to bear the future costs of a mountain of trash that will continue to generate toxins for generations to come).

Other Oregon counties have proactive plans for managing waste.

In Yamhill County, citizens opposed to the expansion of their regional landfill took the issue to the Land Use Board of Appeals, who agreed with them. They then had to sue the landfill in order to get it to close. Meanwhile, they set a goal for Zero Waste and are taking steps to meet it. Lane County recently announced plans to build and operate the most advanced integrated reuse and recycling facility in the nation.

Polk County is looking into building a waste transfer station, to break their dependence on Coffin Butte Landfill.

Metro Portland decided, years ago, that sending trash to landfills in the Willamette Valley contradicted their values around protecting the environment. They decided that the Valley that feeds them (also one of the richest ag economies in the nation) was a bad place for a landfill, so they took a moral stand against dumping trash in their garden.

Benton County planning documents clearly state specific goals for waste management and waste reduction. Those goals are included in the franchise agreement with Republic Services, but Republic seems decidedly disinterested in meeting its contractual obligations.

County government needs to address the obvious problems with Coffin Butte Landfill. Denying this permit application is just the first step. Thank you for your attention to this matter, and for your service to your neighbors.

Sincerely,

— Kiko Denzer

ARTICLES CITED ABOVE:

This farmer's work was ruined by PFAS-contaminated fertilizer that few Midwest states test for

Harvest Public Media | By Teresa Homsi
Published March 11, 2024 at 5:00 a.m. CDT; from https://www.stlpr.org/news/2024-03-11/pfas-contaminated-biosolids-state-testing

Jason Grostic comes from a long line of farmers.

“This is a hundred-year-old operation,” Grostic said. “My grandpa milked cows, my dad milked cows, I milked cows, (then) got into the beef industry. It’s in my blood.”

But Grostic may be at the end of the line.

Two years ago, he was blindsided when the state of Michigan ordered him to shut down his farm, citing high levels of PFAS — or what are often referred to as toxic “forever chemicals” — in both his beef and soil.Grostic had been using biosolids, a treated byproduct from wastewater plants, to fertilize his crops, which he then fed his cattle. But what he thought was a cost-effective fertilizer, turned out to be laden with PFAS.

It’s a risk, Grostic said, no one warned him about — and now his 400-acre farm has been deemed unusable.“I took a fertilizer source that was recommended and was EPA-approved, and the government dropped the ball by not testing it and assuring it was a clean product,” he said.

Biosolids, also known as sludge or residuals, are used as fertilizer in nearly every state and screened for pathogens and heavy metals like lead, arsenic and mercury. But most states don’t currently test biosolids for PFAS, and state officials across the Midwest say they’re in uncharted territory without the proper tools.

Michigan is on the vanguard and has conducted one of the most extensive PFAS investigations in the country, testing municipal water systems, watersheds and sites with suspected contamination.

That has led the state to wastewater plants, biosolids — and eventually Grostic’s farm.

Grostic continues to feed and care for nearly 150 cows that were “seized” by the state, yet remain on his land and can’t be sold. Even after taking odd jobs and putting most of his equipment up for sale, Grostic said he’s on the brink of bankruptcy.

“As a farmer that can’t farm nothing, what am I supposed to do?” Grostic said.

He's now in the midst of a lawsuit against an auto parts supplier, which released PFAS into the wastewater system and contaminated the biosolids he used on his farm. Adam MiedemaPHOTOWCMUA cow named PFAS stares ahead on Grostic's farm in

southeast Michigan. Grostic said Michigan State University is now using his farm and cows to conduct research on how PFAS is transferred from soil to various crops and cattle. He hopes it can lead to more science-backed decisions and help farmers better navigate PFAS.

Biosolids testing

PFAS are a group of more than 15,000 chemicals that are associated with various cancers, decreased immune response, liver disease and reproductive or developmental issues, among other adverse health outcomes.But these toxic chemicals don't break down, and most wastewater plants can't treat them.

Harvest Public Media reached out to 13 Midwestern states for their policies on PFAS testing at wastewater treatment plants. While four, including Michigan, have a PFAS biosolids strategy, nine states said they are not regularly testing."We are wanting to get to as low of concentrations of PFAS in our effluent and biosolids as we can," said emerging pollutant managers, Stephanie Kammer, with the Michigan Department of Environment, Great Lakes and Energy.

In addition to routinely testing, Michigan goes a step further and sets standards for what levels are acceptable in biosolids.

Kammer said if wastewater plants detect two compounds, PFOA and PFOS, above 100 parts per billion (ppb) in biosolids, they are considered "industrially impacted" and can no longer be applied to land. If they're under 20 pbb, they're in the clear.

The program also focuses on identifying and minimizing industrial sources that flush PFAS down the drain and send them to wastewater treatment plants in the first place.

"That's been really effective at reducing concentrations," Kammer said. "There's over 60 industrial facilities that have put in a (PFAS treatment system), prior to discharging to the municipal water systems."

Kammer said the state's been ahead of the curve in addressing PFAS, but she acknowledges the PFAS biosolids standards are not "risk-based."Adam Miedema PHOTO WCMU A bucket holds the name tags of all the cows that have died since the state of Michigan shut down Grostic's farm in 2022. He says the state gave him "respectable" money to purchase his cattle, but it's not a "settlement" for his livelihood. " (These animals) should have been taken to the stockyard, should have been processed, it's a whole lot of different things," Grostic said.Regulatory uncertainties

There's still a limited body of research on how PFAS are transferred from biosolids and soil into crops, agricultural products and the food system.

Currently, there are no federal food safety standards for PFAS. The Environmental Protection Agency is expected to release its highly anticipated risk assessment on PFAS in biosolids later this year and did not respond to Harvest's request for comment.

According to the EPA's PFAS Strategic Roadmap, the assessment will "serve as the basis for determining whether regulation of PFOA and PFOS in biosolids is appropriate."

Meanwhile, many states and regulators are waiting for the EPA's guidance.

“To establish any regulation, I think, is a bit premature,” said Emy Liu, an environmental engineer in the Iowa Department of Natural Resources.

She said Iowa doesn’t have the funding to test wastewater or biosolids and doesn’t plan to until there’s more federal guidance.

“I think the right approach is to wait for the science to be cleared of what is the toxicity of PFAS,” Liu said. “Then (we can focus on) regulations to establish the limits.”Adam MiedemaPHOTOWCMUGrostic's cattle poke their heads out on a snowy February day in Michigan. Grostic says naming the cows has always been a family tradition, but there will be no more cattle on his farm after this. "The government can't afford to shut down other farmers, and the fact is they did it with no science," Grostic said. "They can't just willy-nilly pull the rug out from underneath people and go, 'we took (care of) PFAS.'" A ban on biosolids

But testing for PFAS in biosolids didn’t go far enough for officials in Maine.In 2022, the Maine legislature banned the use of biosolids altogether, after the state identified dozens of contaminated farms.

“There were farms out of business and farmers very concerned about their health impacts,” said Shelley Megquier with the Maine Farmland Trust. “It seemed like a pretty common sense approach for a lot of us to ban the application of sludge.”

Megquier said she wouldn’t prescribe a ban to other states, but she doesn’t think using biosolids is worth the risk of contaminating farmland.

“We're still putting PFAS into lots of products that are making their way into our wastewater and being concentrated in biosolids,” Megquier said. “I can't see a time in the near future where biosolids do not contain PFAS.”

Reducing PFAS is a goal for the wastewater sector in states like Michigan with its industrial treatment program and Minnesota, where the state aims to “end avoidable PFAS use” by 2032.

But banning biosolids is not a popular policy solution among most states. In addition to serving as a fertilizer, biosolids are a cost-effective way to recycle waste.

Fred Hegeman, a residuals coordinator with the Wisconsin Department of Natural Resources, said a ban would be a “knee-jerk reaction.” He said the alternatives to using biosolids, would be sending them to a landfill or an incinerator.

“We don’t have the best available information to make really good decisions right now,” Hegeman said.But if farmers don’t want to use biosolids, Hegeman said, that’s their right.

“That’s the beauty of living in the United States, because you get to pick and choose what you want to put on your land,” Hegeman said. “If a person wants to be cautious and (wait), that makes a lot of sense, but the jury’s out.”

Adam MiedemaPHOTOWCMU

Without a safety net for farmers and more science, Grostic says he doesn't support PFAS testing on farms that could lead to closures. "None of this was done with any science. It was

done out of pure fear of PFAS in the meat," he said. The EPA is expected to release its risk assessment on PFAS in biosolids later this year.

Farmer safety nets

While Maine manages its biosolids ban and investigates farms for contamination, the state also created a $60 million fund to help impacted farmers.

Megquier said a similar national fund could encourage states to act while protecting farmers.

“With PFAS, if you look for it, you will find it,” Megquier said. “I think other states would be better supported in addressing PFAS with a federal safety net.”

Members of Maine’s congressional delegation recently introduced two federal bills to establish a grant program that would compensate farmers such as Jason Grostic.

Grostic remains the only farmer to have been shut down due to PFAS contamination in Michigan. The state argues it was an isolated case, and that because Grostic fed his cattle contaminated feed and sold directly to consumers, PFAS levels in his beef were more concentrated.

Grostic said he feels like the decision was made without any science backing it up, but he said a financial safety net would have been a “game changer,” as he struggles to pay his bills.

“I didn’t do this to myself,” Grostic said. “I never would have taken a product that I thought would completely destroy everything.”

Eventually, the remaining cattle on Grostic’s farm will be gone.

He points to the animals’ ear tags, which feature names like Gizmo, Elsa and Holy Smokes. Grostic said naming the cows had always been a family tradition, but he’s had to break the news to his kids: they won’t get to take over the farm.

“It’s not a conversation you want — it’s not one I should have to have,” Grostic said.

He doubts he’s the only farm with PFAS contamination in Michigan or the Midwest, and he hopes that as more testing is done, other farmers won’t be left behind.

This story was produced in partnership with Harvest Public Media, a collaboration of public media newsrooms in the Midwest. It reports on food systems, agriculture and rural issues.

Send questions and comments about this story to feedback@stlpublicradio.org.

The desperation of Republic Services

https://gazettetimes.com/opinion/column/article_cbb300e3-ad6d-5a59-9e10-65e9ecb49bd1.html

Republic Services is desperate.

Across the U.S., waste transport by rail is booming, thanks to its efficiency and the advantages of siting landfills in dry climates with stable geology and sparse populations.

Landfills may still be a necessary evil, but they must be responsibly located and strictly managed.

In the Pacific Northwest, only one area meets that standard: east of the Cascades. There, Republic and its rival, Waste Management, operate landfills. Waste Management's Columbia Ridge in eastern Oregon is the gold standard — onsite rail, 120 years of capacity, and strong local support since host fees cover infrastructure and half of residents' property taxes.

Republic's Roosevelt Landfill in Washington, by contrast, faces a crippling "last 5 miles" problem: its rail spur sits 5 miles away across steep terrain, forcing polluting truck hauls. Expansion is blocked by geography.

Not surprisingly, Roosevelt has been hemorrhaging contracts — host Klickitat County lost $1 million in franchise revenue last year as counties like Skagit shifted to Columbia Ridge.

That leaves Coffin Butte as Republic's last foothold in the Pacific Northwest. Strategically, it is the only site where the company can still compete.

Regulations make siting new landfills west of the Cascades virtually impossible, so Republic leans on Coffin Butte's proximity to customers to cut hauling costs.

But this "advantage" comes at our expense. With no alternatives nearby, Republic inflates tipping fees while forcing waste to move by road in smaller, more environmentally damaging trucks.

The barriers to entry in the landfill business are immense — permitting and developing a new site costs hundreds of millions. Waste Management has locked up the east side with Columbia Ridge. For Republic, Coffin Butte is the only card left to play.

And they play it ruthlessly. Republic needs Coffin Butte not because it is a good location, but because it already exists. County leaders have enabled this, overlooking environmental and safety failures, methane exceedances, odor and noise complaints, and intake violations.

The lax oversight keeps Republic profitable — shifting environmental and health costs onto our community.If expansion is approved, Republic will be freed of the 1.1 million ton annual intake cap. With both sides of Coffin Butte Road accepting garbage, public access will be shut down, and the valley will be filled with waste — almost entirely from outside Benton County.

Meanwhile, residents already pay some of the region's highest hauling fees. A Polk County rate comparison found Benton County rates top those of six neighboring counties in 82% of cases — $6.85 above average for a standard 32/35-gallon bin.

That premium is galling since our shorter transport distances should reduce costs. Instead, we pay more while bearing the environmental and economic harms of a badly sited, badly managed dump.

Make no mistake: Republic's survival in the Pacific Northwest depends entirely on Coffin Butte. Without it, competitors control the market. With it, Republic survives — but only by turning our community into a permanent dumping ground.

Expansion isn't about local needs. It's about corporate survival at our expense.

Don't be fooled. This "limited expansion" is just a foot in the door. Republic isn't spending tens of millions for just six more years of capacity. If expansion is allowed, Coffin Butte will keep expanding into the next century, rendering Northwest Benton County unfit for housing and depriving our county of millions in property taxes. This is Benton County's crossroads. Either we become Trash Town — trapped in waste and stagnation — or we choose housing, community health and economic vitality by allowing Coffin Butte to close within its current footprint by 2040 as planned.

Our county commissioners must make the wise choice: deny expansion of the Coffin Butte Landfill.

Marge Popp is a longtime Corvallis resident. A retired information systems consultant with an MBA from UC Berkeley, she advocates for fair, transparent, and environmentally responsible waste policy in Benton County.