

From: [Mark Henkels](#)
To: [Coffin Butte Landfill Appeals](#); [Mark Henkels](#)
Subject: Statement in Opposition to LU-24-027
Date: Monday, October 6, 2025 9:03:44 PM
Attachments: [October 6 2025 MH Comment 1 in Opposition to the Coffin Butte Landfill Expansion.docx](#)

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Please incorporate this comment in opposition to the expansion into the appeals process for LU-24-027. This is being sent in time for consideration by the Benton County staff.

I have attached the comment and also pasted it below within this e-mail. If you have any questions or concerns regarding this submission, please contact me.

I appreciate the work the County is doing in this process.
Sincerely,

Mark Henkels
7540 NE Pettibone Drive
Corvallis, OR 97330
<mphcorvallis@gmail.com>, (541) 231-9386

**Comment in Opposition to the Coffin Butte Landfill Expansion,
LU-24-027**

October 6, 2025

Mark Henkels, Ph.D.
7540 NE Pettibone Drive
Corvallis, OR 97330
<mphcorvallis@gmail.com>

County Commissioners Malone Shepherd, and Wyse,

I'm Mark Henkels, Benton County resident. I appreciate my chance to participate in this process whose outcome will permanently affect the County. This statement is in opposition to the expansion requested for Coffin Butte landfill found in LU-24-027.

This comment regards two specific concerns regarding the expansion: 1) the increased volume of waste anticipated by

Republic Services and, more importantly, 2) the superficially appealing but deeply problematical concept of using conditions of approval that would make a bad decision seem reasonable.

First, Republic Services intends to increase the amount deposited by a significant, unknowable amount if this expansion goes through. The increased volume could actually shorten the duration envisioned by the County. In their drawings for the 2025 expansion request, Republican Services says that the volume deposited will be 1,500,000 CUYD/yr in years 1-4 of the new landfill (36% increase), and 1,860,000 CUYD/yr in years 5&6 (78% increase). The current estimate of 12 years in the life of the quarry is based on remaining below the current cap of about 1,100,000 CUYD/year. If that increases to 1,500,000, that knocks 3 years OFF the life of the quarry, and if they fill quarry and the new landfill at 1,860,000 CUYD/year, quarry PLUS expansion will reach capacity SOONER than quarry alone at the current intake cap.

Beyond the space issue, any observer of the facility can see that the rough doubling to the current levels since the early 2010s already greatly increased the external impacts. The doubling of deposited material in the past decade transformed the facility into a huge industrial site. The increased deposits greatly magnified the impacts on the immediate area and extended the ugliness and periodic odors for many more miles.

It is ludicrous to argue that the impact of the current landfill should not influence determination of the effects of the “new” landfill. A truly new landfill would never be accepted, and the expansion will not just add to the existing problems and risks, but enhance them disproportionately since the annual limits would be removed and all the forms of risks are enhanced by the changes in the surface area, the extent of groundwater beneath, and the entry into new viewsheds.

Second, “Conditions of Approval” cannot significantly mitigate the major problems and risks associated with the expansion. Even with Benton County staff trying their best, monitoring and enforcing any conditions of approval is bound to fail over time. If the expansion is approved, any violations of any conditions of approval (or of

existing environmental laws), are unlikely to be strongly enforced. The County would not be able and willing to halt the expansion or stop operations if there is any public disagreement with whether the conditions are met. And you can be sure that Republic Services will contest any allegations of violations, or stall enforcement.

Here are four issues demonstrating the limits of such conditions in the context of this major industrial site.

First, the staff review in the Planning Commission process highlighted that many conditions would be needed to properly protect the public interest, the health of residents, and the environmental quality the County values. The very fact that the staff proposed over 80 conditions before the Planning Commission ruled unanimously to reject the expansion, illustrates the complexity of the harm and risks of landfill operations. The operational risks and problems of the expansion would extend over time and increase since the deposit limits will be lifted.

Second, in economics there is a concept of “sunk costs”, stating that once parties are committed to a process or investment, they are very reluctant to back out. Should the County decide to allow the expansion, county officials will be extremely unlikely to make hard decisions limiting the landfill’s operations, if they are even paying close attention to them.

Third, some requirements, such as the tree buffer, are simply inadequate to address the larger problem they seek to address. The existing landfill is an ugly presence that can be seen for miles as you drive down Independence/Corvallis Road, along Tampico Road, or if you recreate at E.E. Wilson. The expansion, or “new” landfill will magnify that ugliness beyond simply adding to it. Properties will lose nice views of the Coast Range. Neighbors once somewhat insulated from the noises, lights, and smells will be far more directly exposed to these material problems. Tree buffers as proposed, and which were never enforced when required earlier, might hide the mountain from people in the southbound lanes of 99W, but they hardly hide things beyond that narrow strip. In general, conditions suffer may meet specific technical complaints but not the larger uncertainties, risks, and harms created by the

expansion.

Four: Compliance. The record is clear that existing operations have been poorly monitored and exceed state and federal goals regarding methane. While the conditions state that the facility must meet state and federal standards regarding a range of issues, no strong independent entities exist for monitoring and enforcement other than having Republic Services do it in-house. The methane issue showed the problem with this. Recent state laws regarding this regard monitoring rather than enforcement, and their implementation will be problematical.

This same problem exists regarding the smells inevitably created by the future landfill. Benton County will face the same frustration I had when I knew the odor at my house came from the dump but was told otherwise.

The County must assume it is on its own when it comes to monitoring and enforcement. Republic Services' own monitoring and enforcement is obviously inadequate. They might report, but the county lacks the capacity to respond. Regarding groundwater, the staff report in the Planning Commission process noted: "However, the county is limited in its ability to evaluate and regulate groundwater impacts beyond the multiple levels of state and federal regulation applicable to the proposed landfill expansion. Those regulatory agencies provide a more appropriate venue to address groundwater impact."

The same arguments apply to air pollutants, leachates, and surface water flows. Our new understanding of PFAs and the multiple ways they flow into the environment reinforces our need to accept that we should begin to sunset Coffin Butte in favor of alternatives that are designed from the start to better manage these risks.

The US EPA is probably out of action for enforcement for the foreseeable future and the state DEQ simply has too much on its plate as we slide towards increasing budget problems. We are not adequately overseeing existing operations, and there is no reason to think this will change.

No matter what Republic Services' experts say or the promises the

corporation makes, it is legally obligated to maximize its profits. Benton County owes it to its citizens to begin the slow phase-out of Coffin Butte.

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