From: <u>Virginia Scott</u>

To: <u>Coffin Butte Landfill Appeals</u>

Subject: LU-24-027 - Coffin Butte Landfill Conditional Use Permit Application – Oppose – Air Quality and Odor

Date: Tuesday, October 7, 2025 12:07:36 PM

Attachments: Personal Impact Air Quality and Odor - Virginia Scott.pdf

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I Oppose the Coffin Butte Landfill Conditional Use Permit.

Please see the attached testimony on air quality and odor.

Sincerely,

Virginia Scott

Reference: LU-24-027, Coffin Butte Landfill Conditional Use Permit Application – Oppose – Air Quality and Odor

To: Benton County Board of Commissioners 4500 SW Research Way Corvallis, OR 97333-1139

Dear Benton County Commissioners Wyse, Malone and Shepherd,

My name is Virginia Scott and I live at 37016 Soap Creek Road, Corvallis, OR 97330

My Credentials:

Soap Creek Valley Firewise Co-Chair
Studied Fire with: Oregon State Fire Marshal (OSFM), Oregon Department of Forestry (ODF), OSU Extension, Oregon Emergency Management (OEM), Insurance Institute for Business and Home Safety (IHBS)
Landfill Adjacent Homeowner Since Mid-90's
Resides in the Odor "Shadow" of Coffin Butte
Witness to Changing Ecosystem

I am writing because I strongly oppose any expansion of the Coffin Butte landfill and urge you to uphold your Planning Commission's unanimous denial of LU-24-027, Republic Services' application to expand the Coffin Butte Landfill. The Planning Commission carefully considered all evidence provided by the applicant, as well as considerable testimony, and concluded unanimously that the application did not meet the required Burden of Proof.

I appreciate the opportunity to comment on the future of the Coffin Butte Landfill, a decision of great concern to our community, the citizens, farms, wildlife, environment, and properties along the truck routes used throughout the state and affected by this Conditional Use Permit application.

I am concerned about air quality and odor from Coffin Butte Landfill for several reasons and concerned about the increase in these issues if the landfill expansion is approved.

I moved out to the Soap Creek Valley in the mid 1990's approximately 6.4 miles SW of the Coffin Butte Landfill. During the first almost two decades, the only time that I smelled the

landfill was when I drove past it from Coffin Butte Road up Highway 99 to about Robinson Road on my weekly trip to Salem. I almost always had to put the cars air on recirculate for this short stretch of the journey. Since I pass the landfill weekly, I am quite familiar with its aroma. For example, I also pass the former dairy at Rickreall and I never mistake landfill odor for dairy odor.

Over the past several years, I frequently smell the Coffin Butte Landfill odor inside my home even with the windows closed. These odors are strong enough to cause a headache and nausea. I frequently smell the Coffin Butte Landfill odor down on the north end of Corvallis, too. And quite significantly on March 1, 2025, I picked up the distinct stench of the dump when I dropped down from Sulphur Spring Road on to Lewisburg Road and the smell remained strong and present until I reached Southwest Brooklane Drive at Highway 34 just south of the OSU campus, a whopping 12.3 miles away from the Coffin Butte Landfill. Clearly the odor and toxic emissions are not staying on Republic Services property, and clearly the odors and toxic emissions are affecting a significant population including the residents of the Soap Creek Valley, Adair Village, North Corvallis and the surrounding rural populations. I am frustrated when my reports of odors to the ODEQ receive a response from Republic Services of "no problem here, everything is functioning correctly" or "we don't smell it, so there is no problem." Both are dismissive lies by Republic Services.

When I moved out to the Soap Creek Valley in the mid 1990's the trees on my property were draped in usnea longissimi lichen. The presence of this lichen is an indicator of good air quality. The quantity of usnea longissimi lichen on my property has diminished significantly, with a precipitous decline in the last decade. This decline, I understand is an indication of poor air quality.

The lichen is telling you that we have an air quality issue. The residents are telling you that we have an air quality issue. The Oregon DEQ is the department of environmental quality with the responsibility to safeguard our environmental quality built right into the department name.

I am quite disturbed to think that the Oregon Department of Environmental Quality would consider reissuing this Title V Air Quality Permit to Republic Services, that it would be issued with an increase to the permitted emissions, that it does not include PFAS limits, and that it would be based on the self-reporting by Republic Services, who the ODEQ, the EPA, and the Oregon citizens know to misrepresent all of their prior self-reporting. Republic Services cannot be relied upon to adhere to a Title V Air Quality Permit. Republic Services is not adhering to it now and will not be adhering to it in the future. We are counting on the Oregon DEQ to defend our precious environment quality.

BCC 53.215(2) As self-reported by Republic Services, there are 256,000 trash truck trips to and from the Coffin Butte Landfill per year. This does not include the 20+ trips per day, 7 days a week, which haul the leachate from the landfill to inadequately "process" it prior to dumping this leachate in the Willamette River where it travels up to the Columbia River and out to the Pacific Ocean distributing toxic forever chemicals along the way. Along the way it is used a drinking water for several Oregon cities including Adair Village and Wilsonville. There are imminent plans for more Willamette Valley cities to use the Willamette River as a drinking water source in the very near future.

A landfill expansion with the tonnage cap removed means more truck traffic, more methane and landfill gasses, and more leachate with more of the associated issues outlined below.

These truck trips produce diesel exhaust, contributing to greenhouse gases and global warming. What is Republic Services' plan to convert these trucks to an all-electric fleet in keeping with Oregon's Climate Protection Program (CPP) adopted by the Environmental Quality Commission on November 21, 2024 to reduce fossil fuel use by moving commercial trucking from diesel to electric?

BCC 53.215(2) What is Republic Services' plan to mitigate the wear and tear on our Oregon roads from this excessive truck traffic? Currently this upkeep is an undue burden on the county and state and on our taxpayers.

These 256,000 trash truck trips per year are producing an enormous amount of roadside garbage. BCC 53.215 (1) Roadside garbage pollutes the waterways, creeks, streams, rivers, farm fields, and properties along our Oregon roads. If you traveled highway 99, between the landfill and Monmouth, in the November 2024, for example, you may have observed the giant yellow, contractor sized bags of trash the were distributed every 30 to 50 feet on both sides of the highway for 14 miles, which is roughly 4,928 commercial sized bags of garbage. This is garbage that flew off the trucks on this one stretch of road, and from one cleanup event (provided not by Republic Services, but rather by incarcerated work crews). BCC 53.215 (1) This cleanup event, cleaned the ditches, not the farmers' fields, or citizens' properties. Now consider how much more garbage is lining the other miles of Oregon roads and highways that these trucks travel as they collect the bulk of Oregon's garbage for delivery to the Coffin Butte Landfill.

What is Republic Services' plan to prevent future, and clean up past roadside garbage pollution that their current 256,000 trash truck trips per year deposit?

I would like us to also consider the risk posed to other traffic, pedestrians, and bicyclists by the 256,000 trash truck trips per year and the approximate 6,240 leachate truck trips per year crisscrossing our state. BCC 53.215(2) Adair Rural Fire & Rescue, alone, has responded to 195

Motor Vehicle Accidents (MVA) near the landfill. How many of these Motor Vehicle Accidents were connected to landfill traffic? How many more will occur with an expanded landfill? The analysis of this issue has not been undertaken by the county or ODOT.

What is Republic Services' plan to mitigate these risks to our citizenry?

I oppose any further expansion of the Coffin Butte Landfill and urge the Board of Commissions to uphold the unanimous decision of the Planning Commission to deny this expansion, so ask you to reject this application. I believe the Board of Commissions will find that the Applicant, Republic Services, does not provide evidence to conclude that conditional use permit issuance would not violate County Development Code criteria and Comprehensive Plan policies. Further, based on its current performance, Republic Services cannot be expected to demonstrate that it can assure the County of its future compliance with any conditions that the county might issue.

Development Code Chapter 53: Conditional Uses; Administrative Procedures, General Review:

BCC 53.215 (1): The proposed use does not seriously interfere with uses on adjacent property, with the character of the area, or with the purpose of the zone;

BCC 53.215(2): The proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available to the area;

Based on these findings, the proposed use seriously interferes with uses on adjacent public and private property, significantly alters and disrupts the ecological, visual, and rural character of both the zoned area and all other surrounding zoned uses, and thereby greatly exceeds the purpose of the zone.

It has been clearly established that the current landfill use already imposes an undue burden on public rights-of-way, transportation routes, esthetic and scenic values, as well as conservation and restoration efforts and recreational opportunities at state facilities, along with greatly increased traffic, incidental refuse, incompatible noise, noxious odor, combustible vapor, and contaminated air, soil and water. Such grievous current offense cannot justify its furtherance or any proposed increase in its size or use.

I appreciate the opportunity to provide comment to inform your Board of Commissioner's consideration.

Sincerely,

Virginia Scott 37016 Soap Creek Road Corvallis, OR 97330