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To: [Coffin Butte Landfill Appeals](#)
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Subject: Testimony related to LU-24-027
Date: Tuesday, October 14, 2025 11:24:38 AM
Attachments: [Pease Coffin Butte Testimony BOC.pdf](#)

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October 14, 2025

Grant Pease
3505 NW Marshall Dr.
Corvallis, OR 97330

Dear Benton County Board of Commissioners,

Please find attached my written testimony related to LU-24-027.

For reasons spelled out in the testimony, I urge you to reject the proposal for expanding the Coffin Butte Landfill.

Sincerely,
Grant Pease

Grant Pease
3505 NW Marshall Dr.
Corvallis, OR 97330

October 14, 2025

Subject: Deny Conditional Use Permit for Coffin Butte Landfill Expansion, LU-24-027

Dear Benton County Commissioners Wyse, Malone, and Shepherd:

About 30 years ago I interviewed for a job at HP, considering returning to the area where both my father and grandfather attended college. After the interview, I drove out of town to see what the area was like, taking a backcountry route North on Independence Hwy, over to 99W North, then to Airlie Rd and eventually back on Tampico Rd. That spectacular drive cemented my desire to move to Corvallis, and specifically to the Lewisburg area where I now live.

Now, 30 years later I enjoy taking in the natural wonders of our County close to my home. I like to visit EE Wilson Natural Area, an open space area adjacent to Coffin Butte Landfill for bird watching, berry picking, and biking. I, like many Benton County residents, also often bike in the area surrounding the landfill including Tampico Rd, Coffin Butte Rd, Camp Adair Rd, and Independence Hwy.

If the application is approved, and the Coffin Butte Landfill expands, the character of the surrounding areas will change for the worse and it will create a burden to public improvements in the area. **I strongly urge you to deny the Applicant's Conditional Use Permit.**

Specifically, the application fails to meet the County development code in at least the following ways:

Proposed CUP would violate BCC 53.215(1) by changing the character of EE Wilson Wildlife Area and Surrounding Areas.

The proposed landfill expansion will negatively impact Benton County citizens' enjoyment of the Open Space zoned area of EE Wilson Area which serves the public with recreational opportunities including archery, shot gun shooting, fishing, bike riding, wildlife viewing, and education as an "outdoor classroom". The expansion will negatively impact the natural character of this Open Space area as the expansion will likely increase the well documented stench coming from Coffin Butte on some days. It will also degrade the visual character of the EE Wilson resource and increase noise—making a trip to EE Wilson much less attractive. Thus, the expansion would be a clear violation of BCC 53.215(1) because the additional increase in smell, visual blight, and noise from the landfill expansion will seriously interfere with the character of the EE Wilson Wildlife area as it relates to recreational and educational use.

There is an existing odor problem, as anyone who lives, works, or recreates in the area knows. This has been documented, for example, by DEQ and the Coffin Butte Landfill Community Concerns

Annual Staff Report, 2023. **The fact that Applicant does not replicate the problem through modeling does not prove that there is not a problem.**

It's possible that Applicant's odor analysis is faulty for two reasons:

Use of complaint data is not a valid approach to gauging citizen's olfactory experience; the actual experience is likely to be much worse than detected through complaints. There are many reasons why each person who experiences an odor nuisance might not complain, including not knowing where or how to complain, believing that complaining would have no impact, and being too busy with other things.

As one example, Applicant states that the following complaint was a "likely" valid complaint [First Addendum, March 15, 2025, Appendix 1, Pg 5]:

"As I was driving past the Coffin Butte dump on Coffin Butte Road in Benton County, OR on Sunday morning the stench was so strong that I has (sic) to put the car's air on recirculate until I was well north of the dump. It was equally as terrible on my return trip past the dump at about 6:30 PM on 12/29/24 and was smelly even on recirculate well past the Tampico/Soap Creek".

This complaint, that Applicant views as "likely" valid, represents the experience of many people -- that is, most everyone driving on 99W near that time -- and yet it is recorded only once. We have no way of knowing how many people smelled the same nuisance odor during that day.

A better way to gauge citizens' experience would be to conduct a scientifically valid survey, including control groups. To my knowledge this has not been done.

In addition, Applicant notes that thermal inversions can be a contributing factor to odor complaints, but that they did not take thermal inversions into account when evaluating odor complaints because they lacked the meteorological data to do so. (Exhibit 36, "Revised Odor Study", Pg 25). Applicant's own uncertain analysis states:

"Odor modeling is inherently complex and subjective, leading to significant uncertainty."

"In addition, AERMOD has limitations at low wind speeds and is not able to model thermal inversions which could be present around CBLF."

Thermal inversions are obviously important to the level of olfactory pollutants near ground level and a model that does not take inversions into account likely will not reflect the actual level of pollutants at ground level during inversions.

Therefore, because the complaint sampling does not represent our population's olfactory experience and because thermal inversion meteorological data was not taken into account during modeling of the complaints, Applicant's conclusion that the existing landfill does not have significant odor issues is not supported.

Our community knows and has documented that there is an existing odor problem. Acknowledging a problem is the first step to recovery: It's hard to believe that the odor problem that Applicant does not acknowledge, will not get worse as the daily load of refuse increases.

Insufficient Proposed Odor Mitigation and Monitoring

As one proposed mitigation step, applicant proposes Odor Mitigation and Monitoring [OA-9 of Revised Exhibit 21, June 6, 2025]. There are two problems with the proposed mitigation and monitoring:

First, Benton County has no way of enforcing the proposed Mitigation and Monitoring. Applicant does not propose any enforcement mechanism and, as Commissioners know, Oregon DEQ has the sole statutory authority to regulate in the area.

Second, the proposed odor mitigation makes very little mention of the monitoring process, or proposed mitigation steps. They propose to make summary monitoring results public annually.

As a minimum, if this application is approved with conditions, VLI should be required to:

- (1) to meet a detailed County-mandated monitoring program designed by a mutually agreeable external group with County input,
- (2) mitigate issues quickly with financial penalties if the mitigation is not successful as shown by subsequent monitoring, and
- (3) make all raw monitoring data immediately publicly available so that Citizens can build trust with VLI in real-time.

Proposed CUP will likely violate BCC 53.215(1) and BCC 53.215(2) because of the impact to local roads.

As a bike rider, the proposed expansion will have dramatic negative impacts on the character of the area and my use and enjoyment of the surrounding public roads. Because the daily intake of trash is likely to increase, there will be traffic from hauling trash and leachate, smell, and dust on the public roads – even if one stipulates that VLI fulfil their obligations to meet relevant state and federal environmental regulations. These negative impacts are made more certain with the likely elimination of any annual cap on landfill intake tonnage with the approval of this CUP. The number of trucks per day, noise, and smells will go up with daily volume. These changes would be in violation of BCC 53.215 (1) and 53.215 (2), interfering with Benton County bike riders' use and enjoyment of the adjacent roadways and will create a burden on the public improvements and the services available to bike riders in the area.

Conclusion

Like my grandfather and my father, I have enjoyed the country feel of the North Corvallis area in the 30 years since I moved here. I hope that together our community will keep this area as a place for living, recreation, and wildlife.

Because the expansion would violate BCC 53.215(1) and BCC 53.215(2) in several ways, I urge you to reject this Conditional Use Permit to expand operations.

Respectfully,

Grant Pease
3505 NW Marshall Dr.
Corvallis, OR 97330