

From: [Jordan Perez](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: landfill expansion comments
Date: Wednesday, October 15, 2025 11:51:07 AM
Attachments: [251015-LWC Coffin Butte comments.pdf](#)

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Hello, and thank you for taking time to consider input from the public on the proposed landfill expansion decision. Please find attached the written comments of the Luckiamute Watershed Council.

Did you notice that I (and all LWC staff) are now using new and easier to remember email addresses? Don't forget to update your contact list with my new email: director@luckiamute.org Also, please note our new website URL - it is now www.Luckiamute.org.



Jordan Perez (He/Him)
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Luckiamute Watershed Council
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Subject: Opposition to Coffin Butte Landfill Expansion – Impacts to the Luckiamute and Willamette Watersheds

To: landfillappeals@bentoncountyor.gov

Date: October 10, 2025

Dear Benton County Commissioners and Planning Staff,

On behalf of the Luckiamute Watershed Council (LWC), we write in opposition to the proposed Coffin Butte Landfill expansion LU-24-027. Our mission is to protect and restore the Luckiamute River and Ash Creek watersheds. The proposed expansion threatens the long-term health of these waterways and the greater Willamette River system on which our communities, farms, and wildlife depend.

Expanding the landfill would increase leachate volume in a region with high rainfall and complex hydrology. Runoff and leachate enter Soap Creek, which flows into the Luckiamute River just upstream of the Luckiamute State Natural Area, a vital habitat for fish, wildlife, and native vegetation. This increases the risk of pollutants such as heavy metals and PFAS reaching both the Luckiamute and Willamette Rivers. PFAS are persistent, toxic, and are known to be detected in all fish tissue sampled downstream of landfill leachate sites, posing risks to ecosystem health. The Willamette basin-fill aquifer beneath and around Coffin Butte provides essential groundwater for Polk County farms and rural residents. Landfill liners are known to fail over time, jeopardizing these critical water resources. Expansion would further increase waste load, heightening long-term risks to wetlands and critical buffer areas. The buffers required as part of Coffin Butte's permit have become overrun with invasive species such as yellow-flag iris, reed canary grass, meadow knapweed, and bamboo, which spread along Soap Creek and into nearby habitats. Spread of invasives undermines years of restoration efforts and suggests that expansion would only amplify ecological damage to these areas. Additionally, Highway 99W and surrounding rural roads are already experiencing chronic litter from landfill traffic. Expansion would bring more trucks and waste, compounding these impacts. The LWC urges Benton County to deny the proposed expansion as the long-term risks to water, habitat, and community well-being far outweigh any short-term gains of expansion.

Thank you for your commitment to protecting the integrity of the watershed.

Sincerely,

Jordan Perez, Executive Director

Phone: (503) 837-0237 | Email: director@luckiamute.org