

From: [Jennifer Gervais](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: testimony LU-24-027
Date: Wednesday, October 15, 2025 8:04:37 PM
Attachments: [LU24027 testimony Gervais 101525.docx](#)

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Dear staff,

Attached, please find my testimony in opposition to the landfill expansion.

Thank you!

Jennifer Gervais

October 15, 2025

To the Benton County Board of Commissioners:

I urge you to deny LU-24-027 for the reasons I state below.

The applicable code citations from the County Development Code are 53.215(1) and 53.215(2).

According to these codes, there can be no serious interference with uses on adjacent property, with the character of the area, or the purpose of the zone; and that the proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available in the area.

First, there is abundant evidence that the landfill is *already* seriously interfering with uses on adjacent property. In fact, this was the unanimous conclusion of the Benton County Planning Commission in 2021 in response to CUP LU-21-047. Current testimony includes that from local livestock owners who must keep their animals indoors or graze them under direct supervision because of the danger of ingesting errant trash. The sale of a local winery failed recently when the prospective new owners realized that the winery is in the odor plume. Farmers report struggling to hire and retain workers because of the smell. Agriculture and agricultural tourism are vital to Benton County's economy. The landfill seriously interferes with those land uses.

Foul air has been the subject of complaints over six miles from the site. This is not just a nuisance; the underlying chemicals include gasses like methane. Exposure to noxious gas interferes with people's health and limits use of their property on days the wind blows the wrong way.

The landfill interferes with the character of the area, which is rural residential with small farms, and an increasing village center in the form of Adair Village. Increasing the footprint of the landfill will also increase the interference with neighboring land usage, by increasing garbage truck traffic by 50%, the release of even more errant trash, increased noise and congestion on the highway, and noise in the surrounding landscape.

The landfill already emits an outrageous amount of methane and toxic leachate. Leachate going to wastewater treatment plants might as well just be dumped straight into the Willamette River; WWTPs are designed to deal with human sewage, not an unidentified chemical soup. As the climate warms and western Oregon's population grows, the Willamette River will be an increasingly important source of drinking water. It is short-sighted to allow the creation of even more toxic leachate when there are not even any good options for dealing with the current amount. PFAS pollution in particular has caused economic, social, and environmental harm in places like rural Maine.

Leachate disposal is not the only drinking water concern. So far, there are no good data on whether chemicals from the landfill are leaching into local aquifers and wells. It seems that there have not been comprehensive, systematic surveys. However, some of the landfill cells are unlined, others may not be, and all liners eventually fail. Who will try to clean the aquifer? Who will pay for it? Is it even possible? Likely not. Potable water is a precious and increasingly rare public resource. Risking it so Republic Services can make more money at our expense seems a poor return on County investment. We've already got the problem. Why are we risking making it even worse?

Methane is a potent greenhouse gas. It is also explosive. So far, we have been incredibly lucky because there have been no fires at the landfill that could not be fairly quickly extinguished. However, this is an increasing concern as human population in the area continues to grow, and the hotter, drier summers also raise the risks that a landfill fire could ignite surrounding landscapes. In addition, the methane and related gasses have been documented as drifting over residential areas. Expanding the landfill further degrades air quality. Air that is unfit to breathe is clearly an impact on a vital ecosystem service required by us all.

I am deeply concerned by the fact that the US EPA has found multiple violations in

We're already in the hole. The first rule in that situation is ***stop digging***.

In theory, none of these impacts should be happening now if past conditions of approval were really sufficient and enforceable- which is the assumption for a condition of approval. If conditions of approval haven't been working up to this point, why should anyone think that magically, suddenly, they will?

I am sure my fellow citizens will provide additional testimony against this application, so I will keep this letter short.

Please deny LU-24-027, because it cannot be conditioned to comply with BCC 53.215(1) and BCC 53.215(2).

Sincerely,

Jennifer Gervais

MSc (Natural Resources)

PhD (Wildlife Ecology/Ecotoxicology)

12 years served on the City of Corvallis Planning Commission

4 years served on the Benton County Planning Commission (including 2021)

