

From: [Stewart Holmes](#)
To: [Coffin Butte Landfill Appeals](#)
Cc: [Stewart Holmes](#)
Subject: Please reject LU-24-027 without adding a condition of approval requiring the following from Republic Services
Date: Sunday, October 19, 2025 9:26:10 AM

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Summary

The suggestion is made that the Board add the following Condition of Approval to the head of the list provided by Staff.

“Before any approvals are given and before work is done in any pre-construction,s pre-commercial operation and continuously during the life of the project;

Republic Services agrees to pay for the additional hours city staff will be required to devote to fulfilling the requirements set forth in the Conditions of Approval.

Republic Services agrees to pay for any and all additional city staff, including environmental engineers and monitors and all the equipment they will require to preform the work outlined in the Conditions of Approval.

Republic Services shall establish and maintain a permanent fund in the name of the “adjacent landholders” that provides for the ongoing monitoring of the property **in perpetuity**

City staff have recommended conditional approval of Republic Services project. The Staff's decision is backed up by a 114 page report crafted by the Staff and I assume Republic Services attorney team. For that reason I assume the expansion is a *fait accompli*. If that's to be the case, I ask the BOC consider the following.

It has been made abundantly clear that Republic Service does not have a stellar record with regards compliance with environmental rules and regulations. After nearly 25 years working with and for wood products companies, including as a general manager of two mills, I understand the pressure to cut corners where possible and “necessary” to keep operations moving. I assume there will be a certain number of environmental “oops” that go unreported for any number of reasons. There's little reason for me to believe that would change without ongoing monitoring of their operations by a well-funded, community-oriented, independent entity and the knowledge that they would indeed pay for the consequences of their noncompliance. As it stands now, it appears that Staff and Republic Services assumes the costs of those environmental services will be born by “adjacent residents”. That's not likely to happen. Only Republic Services has the financial wherewithal to fund that work.

Last fiscal year Republic Services grossed more than \$16 Billion and had a net income of more that \$2 Billion. That was a nearly 13% increase over the prior year.

They are doing well and can afford the best attorneys money can buy. That was obvious in the quality of the City Staff report. That also means they can afford the best attorneys their money can buy to defend themselves in “environmental court”. Corvallis residents and residents of “adjacent” communities have little or no funds at present to counter Republic Services financial juggernaut.

Consider the following. On page 8, the Staff state:

“Currently, County monitoring of Conditions for all approved conditional use permits relies on complaints, Applicant self-reporting, and, for landfill activities, DSAC Disposal Site Advisory Committee oversight. “

Given the financial health, or lack thereof, of state of local, state and federal environmental agencies and staffing, there's nothing to suggest this would change.

Further, Staff suggest that:

“Speculative and/or unadjudicated matters regarding compliance or lack of compliance with existing Conditions that apply to the existing landfill should not inform the Board’s decision.”

Why not? There have been thousands of hours of input from citizens complaining about the conditions at the “dump”. Why does the Staff believe the BOC decision should NOT inform the Board's decision? If Staff does not put much credence in the complaints of citizens today, why would they or any other agency do anything different in the future?

Whose to adjudicate the complaints? Who will pay for the adjudication?

Finally, Staff suggest:

“In response to concerns about the lack of County funding for enforcing future Conditions related to the landfill, the Applicant has proposed a Condition to reimburse the County for code enforcement related to the landfill and associated conditions.”

This is the crux of the matter and how I believe the BOC can meet the needs of the citizens in the “adjacent” areas while allowing Republic Services to proceed.

But first, in pp 10-90, Staff and Republic Services provide a “doctoral dissertation” quality review of the project and rebuttal of all of the concerns of citizens and the members of the Planning Commission. There is a lot of “yes buts” and “but you must consider that”... The presence of the best attorneys Republic Services could pay is everywhere evident. The affect was to wear me out.

Consider that following that:

PP 94-108 of the Staff report lists the very numerous Pre-construction and Pre-commercial Operations Conditions of Approval and Ongoing Performance Requirements. That's 14 pages of very specific actions and reactions all the parties, in particular Republic Services, must adhere to in order for the project to proceed.

The list goes on and on and on and the key to the implementation and adherence to these Conditions of Approval is the assumption that there will be city and other staff available to do the due diligence, monitoring, “working with Republic Services staff”, etc. No one has said anything about this as far as I can tell. Without funding from Republic Services much or all of the required monitoring will ever take place to the detriment of the citizens of the “adjacent lands” for the foreseeable future.

Question: Where will the money come from to hire new staff to fill the required positions and to pay for the overtime work current city staff will have to do to meet the requirements set forth in these Conditions of Approval?

SOLUTION: I suggest the Board of Commissioners adopt the following additional Condition of Approval to meet the needs of the Pre-construction and Pre-commercial Operations Conditions of Approval and Ongoing Performance Requirements.

Before any approvals are given and before work is done in any pre-construction,s

pre-commercial operation and continuously during the life of the project, Republic Services agree to pay for all the hours city staff devote to fulfilling the requirements set forth in the Conditions of Approval. Further, Republic Services agrees to pay for any and all additional city staff, including environmental engineers and monitors and all the equipment they will require to preform the work outlined in the Conditions of Approval. Further, Republic Services establish and maintain a permanent fund in the name of the "adjacent landholders" that provides for the ongoing monitoring of the property in perpetuity.

Or something to that effect. The purpose of this is to the environmental monitoring of their project . By doing so they are far more likely to comply with all of the conditions of approval knowing that if they don't adhere to those conditions they will be paying for the adjudication of the matter and not the citizens of the "adjacent communities ".

Thank You for your attention

Stewart Holmes

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