

From: [Doug Pollock](#)
To: [Coffin Butte Landfill Appeals](#); [MALONE Patrick](#); [SHEPHERD Gabe](#); [WYSE Nancy](#)
Subject: Fwd: Testimony in OPPOSITION - LU-24-027: Roadside Refuse
Date: Sunday, October 19, 2025 2:57:25 PM
Attachments: [LU-24-027 Testimony in OPPOSITION - Roadside Refuse.pdf](#)

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Dear Benton County Commissioners,

I am submitting the forwarded email (INCLUDING THE ATTACHED PDF FILE) as testimony in OPPOSITION to the expansion of the Coffin Butte Landfill (case # LU-24-027).

Please ensure that this email message with my summary comments (below), along with the previous email AND attached PDF document is included in the public record.

I took the photos of roadside litter (see attached PDF file) in April of this year and submitted my testimony to the Benton Co. Planning Commission. The Republic Services managers surely saw my testimony and must have realized their company's culpability in this problem. Indeed, roadside litter associated with the operation of the dump has been a well-documented concern over many decades. I recall a number of meetings (of Benton County's Solid Waste Advisory Committee) in which Julie Jackson (Republic Services' spokesperson) assured us that Republic Services was regularly collecting roadside litter. **It is clear from my regular firsthand observations that this practice has long since been discontinued by Republic Services** (and I am skeptical they ever did it on a regular basis). Much of the trash I have observed (and documented with photos) has been lying there for months or years judging by the accumulation of soil and vegetation on top of it.

I urge you to stop for a moment and consider the underlying message this sends to you and our community. A multi-billion dollar company that is seeking approval for a landfill expansion that will likely earn it hundreds of millions of dollars is unwilling to demonstrate a basic commitment to picking up roadside trash associated with their operation, along a primary transportation route close to their dump site! This, despite long-standing (and acknowledged) public concern about the roadside litter associated with trash-hauling to their facility. This, despite their clear desire to sway public attention in favor of their expansion.

I am struck by the outright stupidity shown by Republic Services' managers by failing to respond to such an obvious, negative impact of their operation. Picking up roadside litter along the main transportation routes near the dump on a regular basis OUGHT to be a standard part of responsible operation (and should be included in their contract with Benton County). The cost would be negligible. A small crew working a few days a month could take care of the problem in short order. And, yet, Republic Services won't take this basic step to demonstrate corporate and community responsibility. What does that tell us?!

Republic Service's failure to collect roadside litter is deeply symbolic of their shortsighted, greedy efforts to force our community to accept the expansion of the dump. When a multi-billion dollar company refuses to take such a simple, obvious step to demonstrate their

responsibility to our community, it is not only stupid, it is insulting. When they are unwilling to pick up roadside litter, why would you ever expect them to abide by much more complicated and costly provisions of compliance involving the operation of one of our state's largest dumps?! Why would you trust them to follow complex environmental regulations when they won't even pick up roadside trash?! Why would you ever trust them to manage millions of gallons of toxic leachate per year or monitor greenhouse gas emissions or groundwater pollution?

As I stated in my attached testimony, the abundance of roadside litter associated with hauling of trash to the dump is a clear and significant adverse impact associated with the operation of the dump. The inability of Republic Services to deal with these adverse impacts on a regular and timely basis (over many years of operation) is evidence that these impacts cannot be dealt with via conditions of approval. The large volume of roadside trash associated with the dump (some of which is certainly toxic and hazardous) ABSOLUTELY ***"interferes with the character of the surrounding surrounding area and imposes an undue burden on public resources"*** (in violation of Benton County Code 53.215 (1) and (2)).

As Benton County Commissioners, you cannot in good conscience approve the expansion in violation of the Benton County Code. Doing so would not only betray the community (and your oath of office), it would render a flawed decision that would likely be overturned on appeal. I urge you to restore faith in county leadership by rejecting the expansion.

Sincerely,

Doug Pollock
(37293 Helm Drive, Corvallis, OR 97330)

----- Forwarded message -----

From: **Doug Pollock** <timberframing@gmail.com>

Date: Mon, Apr 21, 2025 at 1:02 PM

Subject: Testimony in OPPOSITION - LU-24-027: Roadside Refuse

To: <publiccomment@bentoncountyor.gov>

Dear Benton County Planning Staff,

Please accept my attached testimony (PDF format) below, regarding LU-24-027.

Thank you!

Sincerely,

Doug Pollock

To: Benton County Planning Commission (publiccomment@bentoncountyor.gov)
Subject: Testimony in OPPOSITION – LU-24-027: **Roadside Refuse**
From: Doug Pollock

Date: April 21st, 2025

Dear Benton County Planning Commissioners,

I urge you to DENY Republic Services' Conditional Use Permit (application LU-24-027) to expand the Coffin Butte regional landfill. The proposed expansion would **seriously interfere with the character of the surrounding area** and impose **an undue burden on public resources**, in violation of Benton County Code 53.215 (1) and (2).

Here, I will specifically address the issue of roadside refuse associated with the transportation of trash to the landfill (hereafter referred to as the "dump") - and the many adverse impacts this refuse has on both the character of the region and the public resources (including the roadway and the associated right-of-ways adjoining private lands).

I suspect many of you are only vaguely aware of the significant amount of roadside refuse that comes from the transportation of thousands of truckloads of garbage to the dump each year. Driving by at 60 mph, you may occasionally glimpse a plastic bag stuck on a fence or lying in a field near the dump or along a nearby highway. Like many Benton County residents, you may not even connect the litter you occasionally see with the operation of one of Oregon's largest dumps. Nevertheless, this roadside refuse has a substantial and unavoidable adverse impact on the local community.

As a cyclist who has frequented rural Benton County roads for nearly four decades, I have a much closer connection and visceral reaction to roadside refuse. It is difficult to ignore the garbage lining many of our North Corvallis roads when you're passing by at 15-20 mph in the open air. The enormous amount of trash lying on the shoulders and in the adjacent ditches (**as shown in Appendix A**) is unavoidable and greatly diminishes my enjoyment of the scenic beauty which I seek on my regular rides.

These adverse impacts also affect thousands of Oregonians (and especially Benton County residents) who live along major transportation corridors – since trash is hauled to the dump from all over the state. Trash blows into farmers fields and the front yards of homes along the highways. Imagine if your kids went outside to play and were confronted by bags of unknown, potentially toxic garbage lying by your curb. Would any of you honestly argue this wouldn't, *"seriously interfere with the character of"* your neighborhood – or that it, *"doesn't pose an undue burden on public resources"* (like roads, sidewalks, and waterways) that you use and enjoy on a regular basis?

It is important to keep in mind that trash falling on the roadway has significant, adverse safety impacts, too. It is not just about aesthetics. Roadway garbage can cause accidents, as other drivers encounter the debris and swerve to avoid it. On yesterday's ride, I came to a section with dozens of sharp ceramic shards lying in the bike lane (see photo in **Appendix A**). If cyclists fail to see roadway debris in time (which is often the case), we have to either ride through it or suddenly swerve into the lane of travel. Both come with risks (of a puncture or being hit by a car).

The photos shown in **Appendix A** were taken yesterday (4/20/25). Most of them are from a ~one-mile stretch of Independence Highway (located only a couple of miles from the dump). Note these photos are only a small sample of the trash I saw. There were literally THOUSANDS of pieces of garbage (far too many to count). It is clear from looking at the garbage that the majority of it is associated with the hauling of trash to the dump. It is not generally the type of stuff that someone would toss out their windows or lose while driving down the road. The last two photos were taken near the entrance to the dump. The bag of trash lying on the road shows that roadside refuse is a "normal" adverse impact of operating a dump.

To be clear, this roadside refuse (which is a predictable and unavoidable impact of operating one of our state's largest dumps) *seriously interferes with the character of the surrounding area* by greatly diminishing the aesthetics of scenic travel corridors and degrading the quality of adjacent properties (both residential and agricultural). It also places an *undue burden on public resources* (including land and waterways along transportation corridors). As the photos in **Appendix A** show, roadside refuse often collects in the ditches which drain into and pollute local waterways. It is not just a matter of plastics, but the diverse, toxic stew of garbage headed to the dump (things like diapers, oil, and household chemicals which we know are common components of garbage). This pollution has direct, adverse impacts on wildlife, as well as down-stream communities whose drinking water comes from the Willamette River. **All of these adverse impacts would be continued and worsened if the dump expansion were to be approved.**

In case you're thinking, "*Wait a minute – Benton County has a "covered-load ordinance", so shouldn't that address roadside refuse?!*", I will share a personal experience I had some years ago. I was driving north out of Corvallis on Hwy. 99, right behind a large dump truck. The truck had a cover of sorts, but it was flopping in the wind. Large pieces of insulation kept flying out the back of the truck. I took a number of photos and even a video on my phone showing the debris streaming out of the truck. The license plate was clearly visible. I followed the truck until it turned off at the dump. I spoke to a woman at the scale and told her what I had observed. She told me there was nothing she could do about it, since they technically had a "covered load".

When I got home, I called the Oregon State Police to see if they would ticket the driver for littering. Despite me offering to share my photos and video, they were unwilling to pursue the matter.

I researched the company which owned the truck and found out they were demolishing a building in downtown Corvallis. The garbage they were hauling was coming from that job, which required a permit from the City of Corvallis. I called the City office to report what I'd observed and complain about the company. I was told there was really nothing they could do. Apparently, the issuance of a demolition permit did not impose any constraints on whether or not the applicant followed applicable waste hauling or littering laws.

On several other occasions, I've witnessed people hauling loads of uncovered, residential garbage to the dump (with a loose tarp or piece of plastic thrown on top right before reaching the dump scale). The staff at the dump seldom charge them for having an uncovered load. When I've asked them why, they basically say it's not their job.

These experiences have demonstrated to me that the county's "covered-load ordinance" really isn't very effective in practice. There's no willingness to enforce the ordinance or littering statutes, even when those in charge are presented with indisputable evidence of violations. There is no reason to believe any of this will change in the future. In short, one must conclude that substantial amounts of roadside refuse are a predictable and unavoidable, adverse impact of the operation of the dump.

Approving the expansion would only increase and expand the many adverse impacts of roadside refuse. There is no effective way to mitigate these impacts on the surrounding community. I urge you to DENY the expansion request.

Sincerely,

Doug Pollock
37293 Helm Drive
Corvallis, OR 97330

Appendix A – roadside refuse along Independence Highway and Coffin Butte Road. Most of the photos were taken along a ~one-mile stretch of Independence Highway, on April 20th, 2025.



















































