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To: [Coffin Butte Landfill Appeals](#)
Subject: LU-24-027 expansion objections
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Dear Commisioners:

You have a challenging task ahead of you, sifting through hundreds of pages concerning yet another appeal to expand the Coffin Butte Landfill. May I refer you to, and enter into testimony, a *Corvallis Advocate* article from June 2025: <https://corvallisadvocate.com/coffin-butte-a-deeper-look-at-where-the-garbage-goes/>. It summarizes problems that have continued and grown as what was once a local landfill (inappropriately sited) has been removed from local ownership/control/management by large national corporations and expanded for their profit way beyond the size needed by Benton and adjacent counties. **Control** is the important issue: the above article documents not only the disregard and circumvention of regulations and monitoring by Valley Landfills Inc./Republic Services, but also the undocumented and misleading information it provides or fails to provide for Coffin Butte specifically. The result is that rural, cash-strapped Benton County's government is confronted by a profit-driven, out-of-state, S&P 500 corporation with overwhelming legal and financial resources. Its citizens have little support for their objections to, and little to gain from, being a dump site for the entire Willamette Valley or more. If/when the ReWorld incinerator site closes because it cannot or will not install proper scrubbing, even more potential medical and industrial toxins, in addition to the ash it already sends could worsen problems. Must the landfill be re-classified?

Valley Landfills Inc./Republic Services profits primarily from dumping fees, which counters State and local governments' efforts to reduce our increasing amount of waste, from its generation to disposal.

It is unfortunate that your authority centers on land use compliance regulations. The entire approval/appeal process has become a legal jousting in legalese shrubbery while the forest is threatened. Laws that are either too specific or too general can be cut down with more legalese or ignored if rules do not specifically prohibit. Equally vulnerable are 'unwritten accepted practices and principles' (such as taking care of your own garbage with local cooperation) and even democracy.

In short, the unresolved difficulties and challenges from leachate, methane, noise and dust already present will only compound if expansion is granted. Even worse, the current direction of the current federal administration to remove standards and defund enforcement will exacerbate those issues. Too many corporations have extracted profit and ignored an important aspect of capitalism, which is to re-invest/maintain the structures and employees on which their income and existence depend.

The fix for decades of deferred improvements and maintenance will not be easy or inexpensive. Who will pay? Certainly from the race of mega-corporation executives and boards to accumulate wealth, not they. They will continue to manipulate accounts and tax laws leaving the expenses of bankruptcies, etc. on the shoulders of citizens who are increasingly unable to shoulder them.

I urge you to deny the expansion until our local/county/state governments can develop a

comprehensive approach to control and manage our waste. We should not be at the mercy of remote, extractive/profit-driven corporations over which we have no control. Exceptionalism is mis-placed and -directed if packaging production and disposal costs exceed the value of its contents. My understanding is that Republic Services is under contract to accept our waste until 2040, expansion or not. That would be enough time to continue and codify ways to accomplish the 3Rs of waste management and, ideally, make it self-sustaining.

The pages generated to date remind me of 2017 when President Trump sat sandwiched between 15000 pages of IRS returns and said he was disengaging from his business interests. Judging from current news about Trump Towers, etc., many believe the disinterest is illusional. Similarities exist between that and the volumes submitted by Republic Services - or is it Valley Landfills, Inc. - to expand Coffin Butte Landfill and its promises. Who owns it now? What exactly is their relationship with VLI as a limited partnership LLC, and what does that mean for Benton County when the landfill closes, or VLI declares bankruptcy? It ultimately comes down to money, and Republic Services is doing its best to assure it will not be their problem, which would leave Benton county with hundreds of acres of land that has liability and little value.

In the many pages I have reviewed, I have seen few references to these critical matters. Navigating the county's records of proposals, modifications, and addenda is exceedingly tedious. I hope the papers for your *de novo* review are more comprehensive, collated and contain a meaningful executive summary.

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Republic's self-praise in reference to Coffin Butte has few numbers to substantiate its claims, and are countermanded by many opposing views from those around the country who live near their landfills. They are NOT good neighbors, as those who live nearby can attest. They didn't properly cover the current landfill until they were ready to request an expansion of CUP. Benton County has benefitted for decades from projects funded by local businesses. Other than trash- & landfill-related programs, I can find nothing on their websites directly related to benefits Benton county receives that is at all comparable to the income their landfill generates. Searches for what they do in Benton County turn up programs in Kentucky with a disclaimer for BC.

In addition to their websites, their expansion proposal is likewise filled with much chaff and few specific numbers (i.e. \$\$) Should the CUP be granted, finding, verifying, prosecuting violations would consume years and exhaust the county budget - which is why they are pushing cash-strapped, rural Benton County to accept their proposal. With the current dismantling of consumer protection agencies, standards disappear and affected citizens will have even less recourse for correction/remediation. Their CEO has a \$1.1M salary with additional benefits to \$12M+. Benton County receives a small fraction of just that, let alone the other board members. I hope they have not offered stock or other enticements to elected or appointed members of our County government.

Leachate: Coffin Butte landfill generates nearly 50 million gallons (20 Olympic pools) of leachate, which it has been taking to local water facilities. Republic then claims that since it is diluted and the toxic chemicals are reduced below EPA standards, Republic is not responsible. Dilution is **not** the solution! Moreover, if a leachate sample has several toxic chemicals that fall just below EPA limits, why is that water considered acceptable? Furthermore sludge from the water treatment plants containing an unknown mix of toxic and dangerous chemicals is sold as fertilizer! How can one even begin to consider that acceptable?!

With the increased tonnage, why have they not invested in their own treatment plant, which would be proof positive of their concern for Willamette Valley's water purity. As a Class 1 municipal landfill, why are tests finding toxic industrial chemicals such as 2,4 dinitrotoluene - and hexachlorobenzene - not manufactured in the USA for 50 years - above EPA standards? By their own admission they do not inspect or examine the huge truckloads dumped there, and citizens have photos of materials -in addition to huge dust plumes- that shouldn't be accepted. The current landfill leaks, as do/will all landfills. Willamette Valley water is a resource far more valuable than short term profits extracted from a long-lived landfill.

Methane: Oregon and Benton County in particular, value our natural landscapes, forests, streams, fertile farms as the recently released 360 Photos show. Republic Services surely knows that. Yet it has not gone over and above state regulations to require that its contractors require apartments and commercial establishments separate their organic waste, which would reduce both leachate and methane. Without a tonnage cap current practices will yield even more. Republic claims it has spent millions installing piping for methane capture, which it may have done, but did they spend it here? The PWGC (Pacific Northwest Generating Cooperative) facility should have figures that reflect the increased methane piped through it. Does it? Where are the figures to confirm Republic/VLI's claims about recycling?

Noise: I have been listening to steam shovels, compactors and dump trucks from 7:30am to 4:30pm weekdays near my apartment this month. I cannot imagine living for years with a noise ranging from 40-60dB

Why would you even consider removing the tonnage cap?!

Sincerely
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