From: N Whitcombe
To: Coffin Butte Landfill Appeals
Subject: LU-24-027 COVER LETTER
Date: Monday, October 20, 2025 2:55:19 PM
Attachments: 10202025 WHITCOMBE COVER LETTER.pdf

Please find attached cover letter

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N J Whitcombe

Nancy Whitcombe, AIA (emeritus), LEED AP
37048 Moss Rock Drive
Corvallis, Oregon 97330

To: **Chair Nancy Wyse** and Benton County Commissioners **Pat Malone and Gabe Shepherd**

CC: Anne Thwaits, Benton County Public Information Officer
Petra Schuetz, Benton County Community Development Department

From: Nancy Whitcombe

Date: October 20, 2025

Re: LU-24-027 CUP application – issues pertaining to BCC Chapter 53 Review Criteria raised in testimony in prior written and oral presentations to the Planning Commission but unaddressed by Applicant, Benton County Staff, Benton County Staff Consultants, and proposed Conditions of Approval

Chair Wyse, and Commissioners Malone and Shepherd,

It was disappointing to read in the staff report so many criticisms of the Planning Commissioners, many of whom you yourselves have found to be qualified to serve on this important advisory board and you yourselves have appointed.

It was also disappointing to have citizen testimony dismissed as unreliable hearsay when the presenters of that testimony are in many cases professionals or academics who are as well qualified as the Applicant's paid consultants.

Which testimony to believe? The Applicant's consultants, whom Applicant is paying to say you can't smell landfill odor past the landfill property line, or testimony citing a newspaper article about a farmer who was unable to sell his vineyard after his buyer backed out after being sickened by landfill stench?

The Applicant has had consultants address odor, noise, traffic, wildlife, fire, and groundwater impacts.

For these impacts of this proposal, the Applicant and County staff have concluded that the proposal WILL seriously interfere with uses on adjacent property.

For these impacts of this proposal, the Applicant and County staff have concluded that the proposal WILL seriously interfere with the character of the area.

For these impacts of this proposal, the Applicant and County staff have concluded that the proposal WILL impose an undue burden on public improvements, facilities, utilities and/or services available to the area.

The Applicant and the County propose to protect Benton County by imposing a number of conditions of approval. It is such a large number and the conditions are so complicated that people seem to be unable even to agree on how many there are.

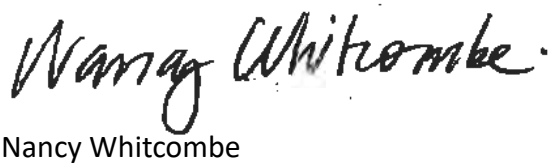
I have prepared a series of white papers addressing **none of the above issues**. Instead, I call your attention to some of the most important issues that have been raised in oral and written testimony that the Applicant appears to believe are unworthy of rebuttal. My papers are on the following issues, and I promise you they are **brief** and readable. They address the impact of the proposal on the following:

- **ECONOMIC BENEFIT**, GILLIAM COUNTY v. BENTON COUNTY
- **PROPERTY TAX REVENUE**
- **AGRICULTURE DAMAGE** BY LANDFILL BIRDS
- **ROAD REPAIR** AND MAINTENANCE **COSTS**
- **HOUSING**
- **LANDFILL LIFE** (although this is not, strictly speaking a Chapter 53 criterion)

PUBLIC HEALTH is likewise not addressed by the Applicant or by Staff. There has been testimony evidence presented of cancer clusters in the vicinity of the landfill. There has been testimony presented that the fugitive landfill emissions cover homes far beyond the landfill perimeters. There has been testimony presented linking the components of landfill gas with significant health impacts, including cancer. The evidence of cancer clusters was cited as a reason for the unanimous denial by the Planning Commission of LU-21-046 in 2021. No increase in landfill area or volumes should be contemplated until a public health authority has concluded that the existing landfill does not pose a danger to public health, an issue which our Representative Finger McDonald's staff is currently following up on with OHA.

An additional piece of missing information of interest to a great many Benton County residents is how much trash rates might increase if Benton County municipal waste were hauled to Columbia Ridge by truck or rail. It's a lot less than you'd think, and in fact might be revenue neutral or even a savings. That's because the savings from cheaper tipping fees for 35 tons of waste (a truckload) can easily overbalance the additional truck expense of hauling that waste. Portland has broken down what customers' $40 or so of monthly garbage service cover, and only about $4 per month -- 1/10 of the total -- goes to transport AND tipping fees at the landfill (which as of their last comparison, in 2019, was only about ½ of the Coffin Butte fee).

Thank you,



Nancy Whitcombe