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To: [Coffin Butte Landfill Appeals](#)
Subject: In opposition of LU-24-027 (Doffin Butte Landfill)
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To County Commissioners,

The environmental and governance systems established during the 1970s were designed to protect the public interest, promote local control, and ensure long-term environmental stewardship. That is the character that the Coffin Butte Landfill was built on. Yet in Benton County, Oregon, these same frameworks have evolved into the foundation of a modern crisis. The Coffin Butte landfill—once a local solution—has become a keystone in a policy structure that rewards continuous waste generation, fuels circular economy expansion, and supports smart city “modernization” under the guise of sustainability.

This condensed report examines how deliberate shifts in regulatory design, federal and international funding incentives, and the language of modernization transformed well-intentioned 1970s environmental plans into self-reinforcing mechanisms that now perpetuate waste dependency. The resulting landfill crisis is not accidental but a predictable outcome of decades of incremental policy realignment that merged local governance, corporate interest, and data-driven infrastructure goals.

1. Historical Foundations (1970s–1990s): Environmental Frameworks and Governance Design

During the 1970s, the United States saw sweeping environmental reforms that laid the groundwork for today’s regulatory landscape. The **Resource Conservation and Recovery Act (RCRA) of 1976** and the creation of the **Environmental Protection Agency (EPA)** in 1970 established a national framework for waste management and pollution control. Oregon was already aligned with these trends, creating the **Department of Environmental Quality (DEQ)** to oversee our efforts as we improved our environment. There are some who even credit Oregon with setting the standard that the EPA was based on.

These systems were guided by strong localism: counties maintained responsibility for solid waste management through comprehensive plans approved by the DEQ.² In principle, this model balanced state oversight with local autonomy. In practice, it created long-term regional monopolies around permitted facilities like the Coffin Butte landfill. Once permitted, expansion and contract renewals became administrative rather than public decisions, removing community control over long-term outcomes.

By the 1980s, regionalization was framed as efficiency. Federal agencies encouraged consolidation of waste systems, centralizing both risk and revenue in a few key facilities.³ The foundational assumption—that waste volumes would remain stable—proved false as consumer culture and industrial packaging soared. Landfills became both environmental

burdens and economic anchors.

2. Policy Drift and Systemic Capture (2000–2020): Incentives Replace Oversight

Beginning in the early 2000s, regulatory emphasis shifted from compliance to performance-based incentives. Instead of penalizing emissions or waste volume, operators were rewarded for measurable “improvements.” The EPA’s **Landfill Methane Outreach Program (LMOP)** epitomized this shift, framing methane capture and conversion as “renewable energy.”⁴

This reframing weakened accountability. A landfill that produced more methane could still qualify for funding, provided it captured a portion of it. Over time, this incentive structure encouraged expansion and delayed closure. The DEQ, constrained by reduced budgets and federal deference to voluntary programs, lost much of its enforcement capacity.⁵

Simultaneously, the **Environmental Protection Agency’s Climate Action partnerships** and **state-level clean energy funds** began to intertwine with private waste operators. In Oregon, this included pilot projects for “biogas recovery” and “waste-to-fuel” conversions that justified new infrastructure investment even as recycling rates stagnated.⁶

In Benton County, these federal and state trends converged. Coffin Butte became not merely a landfill but a regional waste hub. When local opposition emerged, expansion was defended as “modernization,” positioning it within global funding narratives rather than community necessity.

3. Coffin Butte and the Circular Economy: When Waste Became Resource Input

The circular economy—promoted globally by the **Ellen MacArthur Foundation**, the **United Nations Industrial Development Organization (UNIDO)**, and the **European Commission**—was marketed as a sustainability model emphasizing reuse, recycling, and zero waste.⁷ However, the model’s industrial implementation depends on a continuous, predictable flow of waste inputs.

In Benton County, the landfill’s proposed expansion and integration with waste-to-energy initiatives effectively align with this logic. Waste becomes a commodity; emissions become data; and “sustainability” becomes a financial product. Oregon’s **Materials Management Program** explicitly describes waste as a “resource stream,” signaling the shift from protection to utilization.⁸

The County’s role within this system is largely administrative—coordinating contracts and reporting metrics—while the operational and financial power remains external, tied to corporate waste haulers and regional planners. This mirrors broader systems where governance functions as an interface for compliance rather than as a guardian of public interest.

4. Smart Cities and Manufactured Crises: The New Infrastructure Paradigm

In the 2010s, “modernization” entered public policy as a euphemism for **smart city integration**—embedding data systems, sensors, and automated monitoring into traditional infrastructure. In Oregon, DEQ and county planning departments adopted modernization frameworks through regional resilience and innovation grants, many originating from **federal infrastructure acts** and **UN-aligned sustainability programs**.⁹

Landfills became data nodes. Methane-monitoring drones, justified as environmental management tools, simultaneously expanded data infrastructure over residential areas. This technology transfer blurred the boundary between environmental oversight and surveillance.¹⁰

“Modernization,” presented as environmental progress, thus operates as **smart city support infrastructure**—a quiet alignment of local environmental policy with global data-driven development goals. The landfill crisis serves as leverage: by framing capacity as insufficient, regional authorities can justify new “integrated waste facilities,” “renewable resource hubs,” and “biosystems research centers” that anchor smart city economies.

The crisis narrative—overflow, emergency, modernization—mirrors strategies observed in other pilot regions worldwide where environmental urgency was manufactured to accelerate infrastructure investment.¹¹

5. Findings and Systems Analysis

A systems view reveals how Benton County’s landfill crisis is the output of interacting feedback loops rather than isolated failures.

Input: Federal and international policy frameworks incentivizing modernization and circular economy integration.

Process: Local governments adopting performance-based environmental management and pursuing compliance funding.

Output: Expanded infrastructure, continuous waste generation, and data capture for smart city systems.

Feedback: Funding success reinforces policy continuation, rewarding volume rather than reduction.

In this configuration, “waste” is not a failure—it is the necessary input for system survival. The more the county demonstrates crisis, the more eligible it becomes for modernization funds. This is the hallmark of **systemic capture**: when a governance system evolves to sustain itself through the very problems it claims to solve.

6. Recommendations and Path Forward

1. **Pause all landfill expansion proceedings** pending an independent systems audit examining the county’s participation in circular economy and smart city grant

structures.

2. **Reinstate local oversight mechanisms** emphasizing reduction and closure, not modernization metrics.
3. **Separate environmental management from data-infrastructure development**, ensuring that monitoring tools are used solely for environmental protection, not ancillary surveillance.
4. **Revisit 1970s frameworks**—reaffirming the original intent of the RCRA and DEQ mandates: protection, not production.
5. **Develop a citizen-led systems analysis group** to review ongoing policy alignments, grant conditions, and modernization initiatives before adoption.

Only by realigning incentives with outcomes—and restoring transparency at the local level—can Benton County exit the cycle of dependency and reclaim genuine environmental stewardship. The citizens of this county do not agree that waste is the thing that must be sustained so that profits can be made.

Coffin Butte has given more than it was committed to already. Deny this application.

Endnotes

1. U.S. Environmental Protection Agency. *Resource Conservation and Recovery Act (RCRA)*, 1976. <https://www.epa.gov/rcra>
2. Oregon Department of Environmental Quality. *Solid Waste Management Planning*. <https://www.oregon.gov/deq/Pages/index.aspx>
3. U.S. Congress, Office of Technology Assessment. *Facing America's Trash: What Next for Municipal Solid Waste?* 1989. <https://ota.fas.org/reports/8915.pdf>
4. U.S. Environmental Protection Agency. *Landfill Methane Outreach Program (LMOP)*. <https://www.epa.gov/lmop>
5. Oregon Secretary of State. *DEQ Performance Audit Report*, 2019. <https://sos.oregon.gov/audits/Documents/2019-18.pdf>
6. Oregon Department of Energy. *Biogas and Waste-to-Energy Programs*. <https://www.oregon.gov/energy/energy-oregon/Pages/Bioenergy.aspx>
7. Ellen MacArthur Foundation. *Circular Economy Introduction*. <https://ellenmacarthurfoundation.org>
8. Oregon DEQ. *2050 Materials Management Vision and Framework for Action*. <https://www.oregon.gov/deq/mm/pages/materials-management.aspx>
9. U.S. Department of Transportation. *Smart City Challenge*. <https://www.transportation.gov/smartcity>

10. Oregon DEQ. *Landfill Gas Emission Monitoring*.
<https://www.oregon.gov/deq/Pages/index.aspx>
11. United Nations Industrial Development Organization (UNIDO). *Global Circular Economy Program*. <https://www.unido.org/our-focus-cross-cutting-services/circular-economy>