

LU-24-027 IN-PERSON TESTIMONY SUBMITTAL COVER SHEET

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Willamette Riverkeeper | Testimony on Coffin Butte Landfill Expansion

Testimony Opposing the Coffin Butte Landfill Expansion

Dear Commissioners,

My name is Michelle Emmons, Co-Executive Director of Willamette Riverkeeper and Upper Willamette Riverkeeper. I was unable to attend the second night of the hearing so I am submitting my testimony in writing.

Willamette Riverkeeper is deeply concerned about the proposed expansion of the Coffin Butte Landfill.

The Planning Commission made the right call when it denied this proposal after a careful review of the record and substantial public testimony. Expanding this landfill would bring unacceptable risks to human health, water quality, and climate resilience in our region.

In 2022, an EPA inspection found methane emissions at Coffin Butte exceeding federal limits by up to 40 times—clear evidence that gas containment systems are not performing as intended. Methane is not only a potent greenhouse gas, it's also a warning signal that other contaminants may be escaping into the environment.

Leachate and liner systems are far from foolproof. All landfills eventually leak, and at Coffin Butte there is credible concern about groundwater vulnerability and the potential for leachate to migrate into nearby aquifers. This is particularly troubling given that Benton County sits within the Willamette Basin, where agriculture, recreation, and drinking water all depend on clean, healthy soils and groundwater.

The Oregon DEQ's *Groundwater Quality Protection in Oregon* report identifies the Southern Willamette Valley as a Groundwater Management Area due to elevated nitrate contamination and high groundwater vulnerability. And Oregon State University's *Well Water Program* documents clear evidence of landfill leachate runoff and seepage impacting surface water and wells across the state. These findings confirm that what happens at Coffin Butte directly affects the long-term health of our watershed.

Beyond water pollution, emissions and odors threaten air quality, property values, and local safety. Landfills also increase fire risk and strain emergency services.

I want to be clear: meeting the minimum permit requirements is not enough when the baseline systems are already showing stress and monitoring gaps. Expanding this facility without demonstrable proof of consistent compliance and performance accountability risks undermining the very purpose of those requirements. In the context of the Willamette watershed—where groundwater vulnerability, climate resilience, and community health are at stake—we must demand more than just “meets permit conditions.” We must demand performance, transparency, and real accountability.

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On behalf of Willamette Riverkeeper, I urge you to uphold the denial of this expansion and protect the health, water, and climate resilience of our watershed.

Thank you for your time.

Michelle Emmons

Co-executive Director and Upper Willamette Riverkeeper

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