

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

Received From: Oregon Refuse & Recycling Association

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10/10/10

Dear Mr. G. H. H. H.

Dear Mr. G. H. H. H.

My dear Mr. G. H. H. H.

Dear Mr. G. H. H. H.

Yours

W. H. H.



OREGON REFUSE & RECYCLING ASSOCIATION

October 23, 2025

Benton County Board of Commissioners Office
The Honorable Nancy Wyse
The Honorable Pat Malone
The Honorable Gabe Sheperd
P.O. Box 3020
Corvallis, OR 97339

RE: In support of expanding Coffin Butte Landfill

Dear Benton County Board of Commissioners:

Thank you for this opportunity to comment on the appeal of the August 12, 2025, Conditional Use Permit decision of Benton County's Planning Commission, denying Republic Services' application to expand Coffin Butte Landfill. ORRA supports approving the application to expand the landfill.

The Oregon Refuse and Recycling Association (ORRA) is the statewide trade association representing solid waste management companies in Oregon. ORRA members collect and process most of Oregon's residential and commercial refuse and recyclables, as well as operate material recovery facilities, compost facilities and many of Oregon's municipal solid waste transfer stations and landfills. This is my 34th year working for ORRA, and it has been my honor and privilege to serve. Coffin Butte Landfill is a member in good standing in ORRA.

Coffin Butte maintains environmental protection systems that meet or surpass all state and local environmental requirements. This type of environmental performance is accomplished in this industry when sites are expertly designed and maintained, when ongoing investments are made to continuously improve operations, and when the right people are hired to do the job.

It is also important to understand that Coffin Butte Landfill is a modern, state-of-the art, regional facility operating in one of the most highly regulated industries in the country. There is a long history that got us to this place - it used to be that most farms and certainly every town had its own "dump" at the end of a country road, a mile or two out of the way. In the 1970s, numerous environmental failures and the related costly clean up litigations led to changes; in 1976, Congress passed the Resource Conservation and Recovery Act (RCRA).

Amended over time, RCRA required the closure of substandard disposal facilities. Any disposal facility staying in business was required to meet the standards of Subtitle D of RCRA. The technology to build safe landfills, complete with high-tech lining systems, advanced technologies to collect and remove leachate and gas, and ultra-sophisticated systems to monitor long-term environmental

performance, are protections that are good for the environment. They are also very expensive, which is why individual communities could no longer afford their own landfills.

Modern, safe landfills such as Coffin Butte come with high price tags for initial capital and fixed costs. That is why most landfills today have a regional scope; serving more than one community is what makes landfill operation economically feasible. It is the aggregated volume that makes it possible to manage the high fixed costs connected to expensive environmental protection systems.

Landfills aren't glamorous, but they are necessary. We can all continue to work toward waste reduction – and we should do so. It is a relief to know that when something is disposed of, it is done so safely, and people and the environment are protected.

I believe the Willamette Valley Solid Waste Task Force will be considering these types of issues. I have applied to participate on that Task Force and if appointed, look forward to digging in on these concerns. Granting the landfill expansion application would give the Task Force, and the region, the time necessary to develop a strategic plan.

With these considerations in mind, and years of experience working with Coffin Butte Landfill as a reputable member of ORRA, I respectfully ask that you approve the Conditional Use Permit application to expand.

Sincerely,



Kristan S. Mitchell
Executive Director and CEO

c: Julie Jackson, Coffin Butte Landfill