

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

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Testimony to the Benton County Board of Commissioners in Opposition to the Coffin Butte Landfill Expansion Request, LU-24-027

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October 23, 2025

Thanks for your time. I appreciate the hard work and diligent attention you are giving to this decision. Although I also have had negative encounters with Coffin Butte's odor and visibility and fear the risks it creates for my neighbors and others and our natural systems, this statement centers on how to view the information in the record.

First, the analysis in the Staff Report seems designed to emphasize how to make the expansion potentially acceptable rather than considering whether it is a good idea to begin with. It reminds me of how some Tri-city officials once argued that the banks of the Columbia could be a great place to put the whole country's high level nuclear waste "with the proper engineering."

The staff report often has a pattern of noting a potential problem, considering the two sides as being relatively equal, and then recommending a condition that justifies the expansion.

This approach minimizes the problems or risks by assuming that proper required conditions will readily solve the problems. For example, the problem of litter appears easily fixed by adding another bull fence and more litter pickup. Neighbors observing garbage floating hundreds of feet in the air might not agree that litter will be so easily contained, or that the burden should be on them to call for clean-up and trust it will happen.

Likewise, by the time monitoring wells identify leaks, it can be too late to stop them. This is geology, not indoor plumbing. In the early days, Valley Landfill bought nearby properties with problematic wells. Coffin Butte's hydrological footprint will be much larger, as are the volumes being dumped, and buying E.E. Wilson is not so simple should contaminants flow to the east. And it is notable that the US Geological Survey concluded in a 2000 study that all landfills will leak eventually. (<https://pubs.usgs.gov/fs/fs-040-03/pdf/fs-040-03.pdf>)

Your decision should reflect what is truly and simply best for the County, not whether the landfill expansion's issue can be theoretically addressed.

Second, Republic Services uses the term "speculative" when discussing how opponents assert history says required conditions may not be effective. We could say everything is speculative here, but knowledge of the past is useful information. The current failure of

federal and state government to enforce laws, of the County to enforce conditions, or of Republic Services to meet local expectations cannot be ignored. It is speculative to assume that the conditions will work as the staff report asserts. For example, the reliance on self-reporting in the past has been a true problem. I personally experienced how when I reported a stinky day, collaborated with others, the state official said that Coffin Butte's measurement indicated odor was not a problem. No matter what they say, I smelled the landfill seven miles away. Also consider how Republic Services self-reported methane leaks were found to be far in error by both the state and federal officials. Nothing conclusive has happened on that issue yet either.

Third, the staff report papers over some problems rather than truly addressing them. The staff correctly recognizes, I quote: "*Benton County does not have the staff resources or expertise to evaluate whether a proposed conditional use complies with state and federal air and water quality standards.*" So we are to trust the federal government's permitting process in this era? The state's plate is overflowing already, especially as we head towards a recession. We know that Republic Services has plenty of resources to lobby or litigate. Right now is the only time the County will really control what happens next.

Fourth, the assertion that the area is already a dump zone, so the expansion does not change anything, is unacceptable. First, that area still has a vibrant nearby nature refuge, operating agriculture, pleasant neighbors who really enjoy the non-stinky days, and some lovely vistas. And the expansion will change local conditions. Far more surface area will leak methane, be affected by run-off from freak intense rains, and be vulnerable to fire or other unpredictable events. Far more underground hydrological systems are in play. Although opponents provide a strong technical case for closure, which Republic's experts dispute, risks to local water and air quality caused by methane, PFAs and other gases and chemicals will increase.

And yes, the existing dump is an ugly wart on the landscape that can be seen from Suver to North Albany already, but the expansion will broaden that ugliness, extend it further to the south and east, and bring the associated problems closer to Adair Village, Soap Creek valley, Tampico Ridge and throughout north Corvallis.

Two final points.

I am glad to say that you are in charge here. The law gives you discretion to interpret those key phrases such as "adjacent", "undue burden", "seriously", and my personal greatest concern, "character of the area". All lawyers promote interpretations of such words to advantage themselves, their clients, or their own views of what is desirable. Lawyers are not judges or neutral observers. You owe no deference to Mr. Conduit's interpretation of the

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law, or that of any other lawyer. You are purposely given the power to apply your own judgement of how the law applies, and how the expansion affects the County.

Finally, Coffin Butte is a stupid place for a dump. It is a historical mistake that we need to end. The BCTT reports says we have over a decade to develop alternatives to the expansion. Lane County has a serious approach to reducing landfill waste. Alternatives for moving waste are emerging all the time. Expanding the landfill simply enables us and others to briefly avoid better solutions. Despite our County's stated mandate to seek sustainability, we have done nothing notable in this area. We have treated Coffin Butte as a bottomless facility, as have the other counties that contribute 92% of the waste filling that space. But each load carries a price and a risk for all of us in the long run. Time to raise a stop sign.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It includes a detailed description of the experimental procedures and the statistical analysis performed.

3. The third part of the document presents the results of the study. It includes a series of tables and graphs that illustrate the findings of the research. The data shows a clear trend of increasing activity over time.

4. The fourth part of the document discusses the implications of the findings. It suggests that the results have significant implications for the field of study and may lead to further research in this area.

5. The fifth part of the document provides a conclusion and a summary of the key findings. It reiterates the importance of the study and the need for continued research in this field.