

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

Received From: Lindsay Advean

Date: 10/23/25

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BOC ID: BOC2

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October 23, 2025

Benton County Board of Commissioners
P.O. Box 3020
Corvallis, OR 97339

Re: LU-24-027 Coffin Butte Landfill

To Whom it May Concern:

The American Bird Conservancy is a non-profit dedicated to advocating for birds across the Americas. As the Northwest Program Officer, I work on bird conservation issues throughout the region. I also reside in Benton County. This letter serves as written testimony that the American Bird Conservancy opposes the proposed expansion of the Coffin Butte Landfill as proposed under LU-24-027.

Benton County must uphold its responsibility to protect our natural resources and wildlife as outlined in the Benton County Comprehensive Plan, specifically under Goal 5.9 which outlines policies meant to maintain wildlife diversity.

The landfill as it is today is likely interfering with the natural character of the area through negative effects to wildlife diversity, namely by attracting and sustaining unnaturally high densities and presence of avian species such as the Common Raven, American Crow, the invasive European Starling, and various gull species. The Wildlife Assessment and Surveys that were completed for this project did not assess the current occurrence or densities of any of these species or examine the expected changes due to the proposed expansion. A cursory look at bird observation data in the publicly available eBird database indicates that many of these birds are found in high numbers at the landfill. This phenomenon has been documented at landfills around the world and is known to have negative effects on the attracted species themselves, other wildlife species that co-occur in the local area, and on the health of surrounding habitats.

High densities of the species listed above affect other common and sensitive species alike through predation on adults and nests and displacement from nesting sites. It is important

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to remember that these effects are not limited to landfill properties, but extend to the surrounding habitats, as winged wildlife have sizeable home ranges and do not observe property boundaries. Of particular concern is the proximity of the landfill property to the E.E. Wilson Wildlife Area where habitat and wildlife conservation is undertaken for the benefit of all Oregonians. This wildlife area is home to numerous birds listed as sensitive in the Oregon Conservation Strategy, including the Oregon vesper sparrow, Acorn Woodpecker, Pileated Woodpecker, and Western Bluebird. The Oregon Vesper Sparrow is also under consideration for listing under the US Endangered Species Act. Any of these species may find their way onto landfill property, or be affected on the wildlife area by predators or invasive species spilling over from the landfill. This interferes with the conservation mandate of the wildlife area

A documented direct negative effect of landfills to birds includes ingestion of plastic, metal, glass, and other refuse. Ingestion of these substances is known to lead to poor reproductive success. An indirect effect of birds at landfills is nutrient transport. Gulls have been shown to transport nutrients from landfills to local water bodies, which may result in water quality issues for humans and other wildlife.

None of these issues have been examined at the current landfill property or estimated for the proposed expansion, but are highly likely based on the species observations at the landfill and patterns seen at other landfills. There also does not appear to be a management plan to prevent additional attraction of these birds at the proposed expansion sites, or any proposed mitigation measures. As a result, the proposed action would be expected to only increase the negative effects of the landfill on the local wildlife.

Due to likely effects on the health and productivity of local wildlife populations, and the proximity to the E. E. Wilson Wildlife area, this proposal would be expected to seriously interfere with the character of the area and with uses on adjacent property. In summary, this proposal does not align with the wildlife diversity goals in Benton County's Comprehensive Plan, or meet the criteria for a conditional use permit.

Sincerely,

**Lindsay
Adrean**

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Northwest Program Officer

American Bird Conservancy



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