

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

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Testimony on Coffin Butte Conditional Use Proposal at Benton County Commissioners Hearing
Oct. 23, 2025 (6 min version)

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I have been a resident of Benton County since 1994, with a background in electrical engineering. I do want to acknowledge both the Planning Commissioners who obviously took careful consideration to weigh the evidence as well as the County Staff who had the enormous task of synthesizing a large amount of testimony and summarizing the findings.

It is clear that the decision to site a landfill in the geology of Coffin Butte made many years ago was flawed. Unfortunately the scientific understanding of risks wasn't well understood then, but we are no longer ignorant. Today we know better and have 15 years to be planning for its careful closure. Contrary to other testimony, there are better options for solid waste disposal, some that could take advantage of existing rail infrastructure which is cleaner and cheaper than trucking.

When I examine the Staff report to recommend the expansion proposal, I question the conclusions. How can the Staff dismiss some of the biggest issues with the existing landfill operation? Their report recommends NOT evaluating whether the application complies with state and federal air and water quality standards. Instead the issue is punted to regulatory agencies to monitor risky operations and enforce actions to correct bad behavior. Ignoring the standards and assuming that monitoring and enforcement will lead to compliance is a faulty assumption as we have seen. While the County doesn't have in-house expertise, it still has an obligation to ensure federal and state environmental and safety laws are met. If land use laws allow health and safety issues to be brushed aside, then it is time to change the laws.

The Planning Commission noted the large number of conditions of approval and questioned the adequacy of their remediation. County Staff response suggests this is typical, and post-approval performance requirements will ensure compliance. They go on to state that speculative matters regarding lack of compliance shouldn't inform the Board's decision. Are you kidding me? The data presented on egregious leaks, dangerous fire hazards, and frequent odor issues isn't speculative. Lack of compliance should INDEED inform the board's decision and is, in my opinion, a defensible position.

This leads me to another question - what about the existing EPA investigations and DEQ violations of air quality? These cases point to a history of failure under the existing use permits that rely on self-reporting and oversight to properly manage the risks of the existing landfill. Republic Services has no financial incentive to monitor the landfill for air and water quality issues. With the majority of the operating site self-exempted from their monitoring, Republic has shown it would rather turn a blind eye than responsibly manage it. Since past performance is a pretty good indicator of future performance, how many more violations would you expect under

an expanded operation? Approving an expansion makes these risks more likely and more severe. Remember, the dose makes the poison.

The Staff seem overly influenced by hired consultants whose models suggest odor and traffic aren't severely impacting residents. This is a direct contradiction of public testimony with numerous citations of intolerable odor issues and heavy truck traffic creating safety concerns. Obviously the models aren't adequately predicting the impact. If approving this expansion requires residents to stop recreating in their backyards and turns county roads into death traps for bicyclists and pedestrians, aren't these severe restrictions? Since the Benton County Code specifically addresses livability and character of the area, it appears the Staff is undervaluing these impacts.

All of these concerns lead me to question the validity of the Staff report to approve this application. The recommendations appear to be too rigidly tied to interpretations that Republic Services put forth. It should also be noted that the Staff are not an impartial body to these proceedings as they are county employees. Obviously Republic Services has a LARGE financial stake in these deliberations, so their bias must also be taken into account. The citizens of Benton County are ultimately the ones who have to live with the consequences of this important decision. It is clear that the decision to site a landfill in the geology of Coffin Butte made many years ago was flawed. It is easy for other municipalities to extol the virtues of having access to a landfill that isn't in their backyard. They don't have to worry about the leachate while paddling or wading in the Willamette River. They don't have to worry about poor air quality, groundwater contamination, wretched odor, or heavy truck traffic. Republic Services hasn't demonstrated to be a responsible business partner to safely manage the existing landfill, and doesn't deserve to be granted an expansion. For the health and safety of the citizens of Benton County, vote no on this application for expansion.