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June 20, 2025

Benton County Planning Commission
c/o Petra Schuetz, Community Development Director
Benton County Community Development
4500 SW Research Way
Corvallis, OR 97330-1139

Subject: File No. LU-24-027

Dear Benton County Planning Commission:

We represent Valley Landfills, Inc., the Applicant for above-referenced conditional use permit. There were several issues raised in testimony that we did not directly address in our prior testimony.

Litter Impacting Farm Use. In an April 28, 2025, email from Ryan Wilson, who has a ranching operation at 28903 Tampico Road states that he has seen an increase in air-blown trash coming from the landfill, including Styrofoam, plastic bags, and metallic chip bags that could kill his cattle and other area livestock if they were to eat them.

At the threshold, we note that Mr. Wilson's operation is located along Tampico Road, relatively far south of the existing landfill. Mr. Wilson's operation is south of Tampico Ridge, and there are trees between the landfill and his operation. Given the geography, there is a question as to how much debris making its way to Mr. Wilson's operation is actually from the landfill. Nevertheless, as litter has been raised as a concern and Applicant's aim is to always be a conscientious neighbor, Applicant notes that it employs the following litter control measures:

- To catch litter before it becomes airborne, Coffin Butte Landfill deploys portable "Bull Fencing." (First picture below.) This type of fencing is moved with heavy equipment and is placed next to the working face. The landfill also places wire fencing along the main haul road that is reinforced with orange snow fence. (Second picture below). A third line of defense is the main chain link fence around the landfill property.



- The landfill also utilizes approximately 5 temporary labor workers every day. These temporary laborers pick litter inside and outside of the landfill and place the litter in garbage bags that are picked up at the end of the day.
- In addition, the landfill has a contract with the Benton County Sheriff's Department employing work crews to pick up litter along highway 99 and the Camp Adair Road from the landfill to Independence highway twice per month.
- As the working face grows throughout the day, heavy equipment operators place daily cover on the slopes to minimize the amount of exposed waste, which is one of the most effective ways to prevent blowing litter. When the landfill personnel notice that the wind is beginning to pick up, Applicant endeavors to reduce the working area to reduce the potential of windblown debris.

In addition to a condition requiring the Applicant maintain at least the same level of litter control measures with regard to the expansion as outlined above, we propose to add a secondary line of bull fencing behind the existing line and expand the litter collection activities to include Tampico and Soap Creek Roads. Finally, Landfill personnel continue to assess where additional fencing can be placed to minimize off-site litter and will install Defender Fencing where appropriate. (Third picture below.)



The measures will limit the amount of litter leaving the landfill so that it does not “seriously interfere with uses on adjacent property,” or “force a significant change or significantly increase the cost of accepted farm and forest practices on agriculture or forest lands” within the meaning of the applicable criteria.

Odor. Please see attached brief memorandum from SCS Engineers dated June 20, 2025 (Applicant’s Exhibit 51), which provides some further context and information on the results of the June 6, 2025, update to the Coffin Butte Landfill 2024 Expansion Application Odor Dispersion Modeling Study (“June 2025 Model”).

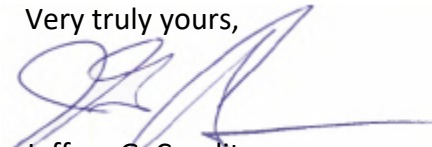
Impact of relocated leachate ponds on surrounding farm and forest uses. Some testimony expressed concern that the leachate ponds, which are proposed for relocation from the LS zone to the FC Zone, could leak leachate into the groundwater and “force a significant change or significantly increase the cost of accepted farm and forest practices on agriculture or forest lands.”

The liner system for the new leachate storage ponds will be similar if not identical to the liner system that is being used in the current leachate storage ponds. This will include a leachate detection layer that is below the primary liner system. This liner system is regulated by the ODEQ and the leachate detection system is required to be monitored semi-annually. Based on our required monitoring of the existing leachate storage ponds, we do not have records of a leak detected during the time the existing ponds have been in operation. And, as explained in submissions from Geo-Logic Associates, Inc. and Tuppan Consultants LLC, there has been no evidence of a release to groundwater from portions of the Coffin Butte Landfill equipped with composite liner systems. Applicant would be glad to provide the results of the semi-annual monitoring to the County as a condition of approval.

The relocated leachate ponds will have no impact on surrounding farm and forest uses.

Thank you for your consideration.

Very truly yours,



Jeffrey G. Condit