

From: [Mark Henkels](#)
To: [Benton Public Comment](#)
Subject: Written Testimony - LU-24-027 (Landfill Expansion Application)
Date: Tuesday, March 25, 2025 12:52:34 PM

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Benton County Planning Commission:

Please consider these comments as you decide the merits of the Coffin Butte Landfill expansion variance: Application file number: LU-24-027. I hope that you use your legal discretion to reject the application and thereby protect the quality of life for local residents and others who utilize this area. I am glad that we empower citizens to apply their independent judgement to determine what is best for our community.

My comments here regard the ways in which the expansion would impose an undue burden on any public improvements, facilities, utilities or services available to the area [Benton County Code 53.215 (2)]. The expansion would impose an undue burden the public's ability to use and enjoy E.E. Wilson Wildlife Area and poses a permanent risk to all people who recreate, farm, or live where water from the landfill may eventually flow.

E.E. Wilson Wildlife area is directly across Highway 99W from the Coffin Butte landfill. The existing mountain of refuse looms over the site and current truck traffic, dust, and odors issues will be magnified greatly and be stretched out for decades longer if the expansion is improved. The expansion would affect all activities of this facility through both the extremely negative impact on the character of the area and because of likely, or perhaps inevitable, intrusion of both air and water pollution into the area. Community activities at E.E. Wilson are numerous and diverse. Users of E.E. Wilson include birders, hunters, fisherman, archers, naturalists and educators and their classes. Those hunting there can bag pheasant, quail, rabbits, dove, snipe, crow, waterfowl (no goose hunting), coyote, and big game. According to Oregon Fish and Game, 3,970 hunters visited E.E., Wilson in the 2022-2023 season. The ADA-accessible fishing pond is very popular, as is the archery park. As the E.E. Wilson website notes, "The proximity of E.E. Wilson Wildlife Area to many local schools, colleges and universities makes it popular for those instructors seeking an "outdoor classroom" for students." Finally, there is also a Memorial Garden that commemorates the military units based at the site during and following World War II.

The most immediate impact of the expansion on the recreation area would be how it would haunt the view to the west. Already the existing landfill operation looms over the wildlife area. You can hear the operation, but even more bothersome is when you see the large truck being raised in the air and then the dust and other debris being blown out as they dump. When you drive roads to the east of the landfill from both the north and south, the landfill stands out against the Coast Range. Between Highway 20 and E.E. Wilson, the extensive litter along the

road is saddening.

A deeper impact of the expansion would be the continuation and likely increase in the stench from the dump that predictably hits E.E. Wilson. A simple visit to the area or glance at the map reveals the vulnerability of the spot to smells emitted from the dump even when it is operating properly. During the COVID epidemic I would regularly walk there and on a few occasions I cut my trips short because of the smell. I hope that as part of your review process you spend a little time at E.E. Wilson. You will be able to envision how a second mountain of trash would negatively affect your experience, and you may get a whiff of the odors (if not worse).

But the impacts of the proposed expansion go beyond those readily identifiable problems.

The greatest potential problem is the impact on local above-ground and underground water flows, which local geology drive towards the Wildlife Area, Soap Creek and the Luckiamute River. As noted in the Benton County Talks Trash Final Report, "Groundwater flows both east and west from the area of Coffin Butte Landfill and Tampico Ridge, depending on the underlying geology. Steve Taylor et al. note that there is an unnamed tributary between Coffin Butte and Tampico Ridge and that 'associated wetlands drain east-ward toward the E.E. Wilson National Wildlife Refuge.' Rainfall in the area is approximately 42 inches a year, with the majority falling between November and May." (Page 24). The flow of water from the proposed expansion site will therefore flow towards E.E. Wilson.

Dumps produce leachate, a mix of complex substances, some of which include heavy metals and other toxic chemicals. Currently the Coffin Butte industrial site produces at least 32 million gallons of leachate, which have recently been disposed at the Corvallis and Salem sewage treatment facilities. (Annual Environmental Monitoring Report, Coffin Butte Landfill, Benton County, Oregon, Solid Waste Permit # 306, 2024) According to Science Direct, "Due to its high toxicity, landfill leachate is a major threat for aquifer and surface water health status. The exact chemical composition of landfill leachate depends on waste composition, climatic conditions, and the age and degradation rate of the solid waste ". (Bulc, 2006, as found in <https://www.sciencedirect.com/topics/earth-and-planetary-sciences/landfill-leachate>, 014).

The Coffin Butte facility has systems in place to reduce the leachate problem and to prevent leachate from getting off-site accidentally, but whatever Republic Services does to control of leachate, major inherent risks for leakage remain. Three reasons for the risk deserve particular attention. First, a key way to reduce leachate production is to control the amount of water flowing into the landfill material. This is partially why there is the large fabric coverings on modern landfills, such as you see at Coffin Butte. Water still gets in, however, just as methane leaks out by accident. Therefore, leachate volume exceeds the liquid contained in the material being dumped or that decomposition creates. Western Oregon is not well-suited for a landfill due to our high precipitation. In contrast, Republic Services landfill operation in Roosevelt, Washington is much better located because, "Unlike older landfills which were more often located on existing sites that were convenient rather than environmentally sound, this one was carefully chosen. Since there is very little rainfall, the site doesn't produce much leachate (liquid runoff that could be contaminated by the garbage). It is a rural site with few neighbors except for the cows." (Solid Waste Report (May 27, 2016,)

Regarding the expansion, the greater area covered by the landfill creates more opportunities for water to get in and expand the volume of leachate. While the Roosevelt Landfill receives about 8.5 inches of precipitation per year, Coffin Butte gets more than 40 inches. Greater

precipitation increases that chances of leakage coming from the bottom of the facility as well. The specific risks of problems is enhanced by the potential for mechanical failure, such as tears or holes in the bottom lining. Also, Coffin Butte's required 2024 Environmental Monitoring Report, conducted for Republic Services by Tuppen Consultants, notes that there was a temporary pump malfunction in the leachate system in January 2023. This specific incident did not cause any measurable problem, but demonstrates the inherent difficulty of maintaining such complex systems. (<https://cd.bentoncountyor.gov/wp-content/uploads/2024/08/2023-Coffin-Butte-Landfill-Annual-Environmental-Monitoring-Report-Part-1.pdf>, p. 3-11)

The US EPA has concluded that all landfills eventually will leak into the environment. (<https://pubs.usgs.gov/fs/fs-040-03/pdf/fs-040-03.pdf>) Given the multiple decade after-life of leachate production in closed dumps, the expansion of the Coffin Butte landfill could more than double the risks of these leaks seriously affecting the surrounding area. Republic Services or their successor will someday leave, but the landfill will not. Benton County residents, and those who would like to enjoy E.E., Wilson, are likely to face the consequences of the facility's impact on the surrounding area and the waters that flow from it.

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