



April 19, 2025

To: Benton County Planning Commission, Nick Fowler, Chair

The Willamette Valley chapter of the Great Old Broads for Wilderness **strongly opposes the expansion of the Coffin Butte Landfill**. For the health of our air, water, land, and communities, now and into the future, we insist that the Benton County commissioners reject this noxious expansion.

The Great Old Broads are a national grassroots organization and most of our chapter's more than 100 dues-paying members are Benton County residents who care deeply about the people and nature of the Willamette Valley.

Rather than considering any expansion of this faulty landfill, we believe Benton County should be realistically planning the *inevitable* closure of the landfill. That means developing a serious plan that details a modern waste-recovery facility, an effective waste-reduction system, and a realistic accounting of the cost of clean-up, a cost that Benton County residents will have to pay. Such a plan should be developed in a public process, and be responsible to public review and comment.

As for the proposed expansion of the landfill, we see many troubling problems, including:

- **Gross under-reporting of methane pollution by Valley Landfills, Inc.**, despite 2023 satellite images that show some of the largest methane plumes in the Pacific Northwest emanating from Coffin Butte. In 2022 and again in 2024, the EPA found explosive levels of methane leaking from Coffin Butte, after Valley Landfill had reported only negligible leakage. Landfills are a major source of methane, a climate-damaging gas 28 times more powerful than CO₂.

A landfill expansion will only exacerbate this problem at Coffin Butte. This would seriously interfere with the health and well-being of adjacent residents and public lands within a four-mile radius, where widespread drift of noxious chemicals is regularly detected by residents and recreationists. (Criteria 1)

- **Other hazardous pollutants, including mercury, lead, industrial solvents, and “forever chemicals” (PFAs) leach out of the landfill and end up in the Willamette River.** In 2021, 31 million gallons of leachate were pumped out of Coffin Butte and sent to wastewater treatment plants in Corvallis and Salem, where the leachate passed through treatment plants not equipped to capture PFAs, and then dumped into the Willamette River.

Without a credible plan for significantly reducing leachates, a landfill expansion would increase

toxic pollution into the Willamette River, putting increased burden on public utilities by further fouling municipal sources of drinking water. (Criteria 2)

- **Coffin Butte already receives one-third of all of Oregon's garbage**, much of it in large loads of unsorted solid waste. Valley Landfill and Republic Services make little effort to encourage (much less enforce) recycling and waste reduction, despite DEQ's mandate to shift from Solid Waste Management to Materials Management. An ever-larger landfill serves far-flung communities that choose to ignore the importance of Materials Management and leaves an increasing burden of liability on Benton County.

Benton County needs a far more serious Sustainable Materials Management Plan that provides a roadmap toward eventually closing, not expanding, Coffin Butte. The current status-quo approach to waste management violates the shift toward Sustainable Materials Management criteria endorsed by Benton County and the state of Oregon. (Criteria 3)

- **The environmental impact of Coffin Butte extends well beyond the landfill itself.** Besides releases of climate-damaging methane into the air and toxic leachate into the river, the smell of rotting garbage percolates across the northern part of Benton County. Wafting along with rank odors is a cocktail of toxic chemicals—vinyl chloride, ethyl benzene, toluene, benzene—that can endanger public health and welfare. Expanding the Coffin Butte landfill will certainly expand the release of these toxins.

Coffin Butte started as a military dump for Camp Adair during World War Two. The expanding sight, smell, and health threats of this landfill has made it a filthy “Welcome to Benton County” landmark that seriously damages the character of the area. (Criteria 1)

- **Benton County is burdened by the unlimited long-term risk and environmental liability for the landfill**, even though Benton County does not own the landfill. Republic Services, and its subsidiary, Valley Landfills, own and operate the landfill, but it is likely that Benton County will face substantial financial expense of cleanup, which could be far greater than the funds currently being saved for this purpose.

An expansion of the landfill imposes the burden of increased risk and liability on Benton County, compromising the county's capacity for future public improvements, facilities, utilities, or services available to the area and to the residents of Benton County. (Criteria 2)

- **Expanding the landfill removes any volume restriction imposed by Benton County**, freeing Republic Services to immediately increase intake of waste from the region. This Coffin Butte expansion will have long-lasting negative impacts to water quality, air quality, and the climate, rippling far beyond the local area and lasting far longer than the short lifespan of the landfill.

In summary, expansion of the Coffin Butte landfill:

- Will seriously interfere with current and future uses on adjacent property within the watershed, air-shed, and view-shed. (Criteria 1)
- Will seriously interfere with the character and identity of the area, making Benton County a

- dump site rather than a destination. (Criteria 1)
- Will impose an undue environmental and financial burden on future public improvements, facilities, utilities, and services that might otherwise be made available to the surrounding area. (Criteria 2)
 - Will violate the spirit and the mandate to shift from Solid Waste Management to Materials Management, a stated goal of Benton County and the State of Oregon. (Criteria 3)

Thank you for considering our comments.

Sincerely,

Benton County members of the Willamette Valley Broadband leadership team

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