

From: [John Deuel](#)
To: [Benton Public Comment](#)
Subject: Testimony related to the Coffin Butte landfill expansion applicaiton LU-24-027
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Attachments: [Submitted Testimony- John Deuel.pdf](#)

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Please find attached my testimony to be submitted as part of the public comment period.

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Our home in Philomath, Oregon is located within the traditional homelands of the Mary's River or Ampinefu Band of Kalapuya. Following the Willamette Valley Treaty of 1855 (Kalapuya etc. Treaty), Kalapuya people were forcibly removed to reservations in Western Oregon. Today, living descendants of these people are a part of the [Confederated Tribes of Grand Ronde Community of Oregon](#) and the [Confederated Tribes of the Siletz Indians](#).

Submitted Testimony online on 4/20/25 opposing Coffin Butte Landfill Expansion application, LU-24-027

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This testimony is on my sole behalf and does not represent any organization.
John Deuel, Resident of Benton County

I am a relative newcomer as a resident here. I moved here in 2016 after living in Norfolk and Virginia Beach, Virginia, for over 30 years. I have devoted much of my career to achieving sustainable materials management and continue to do so after my retirement in 2023. I participated in the Benton County Talks Trash (BCCT) project in 2022-2023 and am now a member of the Regional Sustainable Materials Management Plan Task Force.

My intent in developing my own position on the proposed conditional use to expand the Coffin Butte Landfill is to be objective and consider multiple concerns within a very complex problem. I acknowledge my own bias toward preventing waste, recycling, and viewing landfills as the last resort. I believe that even with significant improvements in our recycling systems and the advancement of more sustainable systems for managing our material resources, landfills are still necessary.

The two areas of concern that I have are:

1. How well the application demonstrates that the land use requirements and the operator's plans for compliance will be monitored and shared by the County.

We learned through the BCCT shared understandings consensus process that the record for environmental monitoring of the landfill has been mixed. While serving on the Benton County Solid Waste Advisory Council, I observed consistent annual reporting from the landfill operator. However, gaps in oversight by the County and other state and federal agencies have emerged through the BCCT report.

The application states that the "hauling of leachate will continue to be disposed of per DEQ/EPA regulations." While this appears adequate on the part of the Landfill operator, concerns were raised during the BCCT regarding the capacity of the Corvallis Wastewater Treatment facilities to accommodate the leachate that will continue to be brought to these facilities. I am not aware of any research or further analysis about these concerns.

Last year, the EPA identified 41 locations at Coffin Butte where methane emissions exceeded the legal limit of 500 parts per million, including one area that was releasing over 100,000 parts per million. Methane emissions into the atmosphere have a significantly negative impact on climate change.

I have concerns about how well the County can meet these oversight and monitoring requirements, given the level of staffing and funding historically allocated for this purpose. This challenge is exacerbated by general economic conditions and federal funding and staffing cuts, which have a trickle-down effect on State funding. In response to this current uncertainty, Benton County has frozen all hiring. Given the political confusion at the federal level, this trend could continue for some time and hinder the proper monitoring and transparency needed if this conditional use is approved.

2. My assessment of how the proposed land use is viewed within the lens of the sustainability values of Benton County's 2040 Thriving Communities Initiative.

I support the extensive work done in 2017-18 and the resulting "Core Values" presented as part of Benton County's "2040 Thriving Communities Initiative. " These values include "High Quality Environment & Access" and "Diverse Economy that Fits. "

I applaud the County for initiating the community engagement process to address historic and current concerns about the Coffin Butte Landfill. More importantly, they are proactively shifting the focus of the Sustainable Materials Management Plan toward upstream parts of the materials management chain, such as waste prevention and reuse.

This effort to concentrate its resources and public focus on the shift to a circular economy will be more sustainable and consistent with Oregon's 2050 Vision for Sustainable Materials Management. This shift has the potential to delay the closure of the existing landfill, buying more time for the ongoing transformation to more sustainable materials systems.

Landfilling will continue to be necessary, but it is the least desirable, relatively expensive, and environmentally risky option for managing solid waste. Well-managed and carefully monitored landfills serve a public need; however, in my view, they have become a crutch for maintaining the status quo of an unsustainable linear process: resource extraction, transportation, production, consumption, and finally, the permanent disposal of our limited resources. We have also over-relied on a recycling system that has generally been ineffective. Filling up our recycling cart may give us a sense of satisfaction, but that is not the goal.

We have learned over the past decade that this "make-take-throw away" status quo is not sustainable and needs to change. I question whether expanding landfill space at the proposed location addresses this problem or merely "kicks the can down the road, " thus obscuring or delaying the changes needed to manage our waste sustainably.

Due to the need to urgently change our materials management systems and address monitoring uncertainties, I oppose the approval of the pending Conditional Use Permit to expand Coffin Butte Landfill. I urge the County to continue its leadership in developing the Regional Sustainable Materials Management Plan with the utmost urgency and to implement its recommendations in collaboration with neighboring governments and the State of Oregon.