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To: [Benton Public Comment](#)
Subject: Oppose/Deny LU-24-027
Date: Monday, April 21, 2025 2:30:24 PM

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To the Planning Commission:

My name is Robert Kipper. I am currently a member of the Benton County Disposal Site Advisory Committee (DSAC). I am not representing the committee, but rather I am a private citizen speaking on behalf of my family's third generation 80 acre woodlot north of Corvallis. Our Douglas fir timber stand is directly adjacent to the Republic Services' southern Coffin Butte Landfill buffer zone. I am sending this letter to the Benton County Planning Commission in opposition to the Conditional Use Permit (CUP) LU-24-027 application submitted by Republic Services to expand Coffin Butte Landfill. I believe climate change enhanced summer temperatures and corresponding wind events are putting our property at risk, specifically wildfire risk. This new proposed southern expansion of the landfill would cross the fire break that is Coffin Butte Road. If new landfill operations are created across Coffin Butte Road there is the very real possibility of a fire running up the north slope of the ridge (spontaneous combustion on landfill slopes are a known fire risk) into our family property and beyond. In a wind event, embers could easily rain down on Adair Village and McDonald Research Forest with devastating consequences.

My concern is based on personal experience. Our house in Santa Rosa, CA was evacuated during the October 2017 Tubbs Fire. In less than 3 hours the fire raced from Calistoga to our Santa Rosa neighborhood (12 miles – Coffin Butte Landfill is 11 miles from our current residence on Witham Hill in Corvallis), propelled by 30 mile an hour wind gusts. Here in the Willamette Valley, dry season heat domes with accompanying winds out of the north seem to be occurring more frequently. The Coffin Butte Landfill has had concerning multiple fires this year and documented methane leaks at explosive levels (50,000 - 70,000 PPM).

According to The Oregon Climate Change Research Institute "The most recent generation of downscaled global climate models indicate that from 1981-2020, maximum daily temperature in the area around the landfill was equal to or greater than 90°F on a mean of about 12 days per year (standard deviation [SD] 1 day). From 2025-2034, the mean number of days per year is projected to be 21 (SD 4). From 2035-2044, 24 days (SD 4), and from 2045-2055, 28 days (SD 5)."

Salem Airport historical data from the Weather Underground includes hourly snapshots of Temperature, Wind Speed / Direction, Wind Gust and Humidity (the closest representative hourly data I was able to acquire). Following are a few examples of heat dome characteristics. During last summer's heat dome, winds were out of the N, NE with wind gusts above 20 mph at peak temperatures. On 7/5/2024 between 4 pm and 6 pm: 102 degrees, 15% humidity, sustained wind at 15 mph with gusts over 20 mph. During the Labor Day fires of 2020, a 12 hour period saw sustained winds from the NNE as high as 22 mph, gusting to 31 mph with humidity ranging from between 15% to 18%. On 7/11/2018 there was a 6 hour period of sustained N winds from 12 to 17 mph, gusting to 24 mph with a 26% to 33% humidity

range. During these heat events the wind is always from the N or NNE, directly into our woodlot and toward McDonald Research Forest.

Known ignition sources emanating from the Coffin Butte Landfill:

- Working Face Fires \ Hot Load Dumping
- Vehicle \ Heaving Equipment \ Welding
- Gas Flare \ Burning Ember Emission
- Gas Well Fires
- Spontaneous Combustion on Slopes

From the September 11, 2024 DSAC minutes:

SES Engineering Risk Assessment (paid for by Republic Services), noted that operators believed the flare may have caused a fire by igniting nearby grass. As a precaution, Republic Services created a gravel-covered buffer between the flare and grassy areas, which was believed to prevent further fire incidents. However, a fire in the summer of 2024 proved otherwise. Republic Services has provided multiple assurances that their fire prevention systems were adequate, but real-world incidents like the above and the fact that motorists on Highway 99 are the first to notice fires, demonstrate that these systems are failing. Republic Services disagreed with the assertion that fire risks are increasing.

Benton County cannot move forward on a long term, landfill expansion decision based on promises of future fire mitigation efforts by Republic Services. Systems must be in place and fully functioning for a number of years before they can be deemed reliable and adequate. Moving the landfill operations across the Coffin Butte Road fire break, into an upsloping Douglas fir forest will place my family's woodlot and therefore northern Benton County at unnecessary and potential devastating fire risk.

Thank you for your consideration in this matter.

Best Regards,

Robert J. Kipper

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