

From: [Doug Pollock](#)
To: [Benton Public Comment](#)
Subject: Testimony in OPPOSITION - LU-24-027: Roadside Refuse
Date: Monday, April 21, 2025 1:03:49 PM
Attachments: [LU-24-027 Testimony in OPPOSITION - Roadside Refuse.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Benton County Planning Staff,

Please accept my attached testimony (PDF format) below, regarding LU-24-027.

Thank you!

Sincerely,

Doug Pollock

To: Benton County Planning Commission (publiccomment@bentoncountyor.gov)
Subject: Testimony in OPPOSITION – LU-24-027: **Roadside Refuse**
From: Doug Pollock

Date: April 21st, 2025

Dear Benton County Planning Commissioners,

I urge you to DENY Republic Services' Conditional Use Permit (application LU-24-027) to expand the Coffin Butte regional landfill. The proposed expansion would **seriously interfere with the character of the surrounding area** and impose **an undue burden on public resources**, in violation of Benton County Code 53.215 (1) and (2).

Here, I will specifically address the issue of roadside refuse associated with the transportation of trash to the landfill (hereafter referred to as the "dump") - and the many adverse impacts this refuse has on both the character of the region and the public resources (including the roadway and the associated right-of-ways adjoining private lands).

I suspect many of you are only vaguely aware of the significant amount of roadside refuse that comes from the transportation of thousands of truckloads of garbage to the dump each year. Driving by at 60 mph, you may occasionally glimpse a plastic bag stuck on a fence or lying in a field near the dump or along a nearby highway. Like many Benton County residents, you may not even connect the litter you occasionally see with the operation of one of Oregon's largest dumps. Nevertheless, this roadside refuse has a substantial and unavoidable adverse impact on the local community.

As a cyclist who has frequented rural Benton County roads for nearly four decades, I have a much closer connection and visceral reaction to roadside refuse. It is difficult to ignore the garbage lining many of our North Corvallis roads when you're passing by at 15-20 mph in the open air. The enormous amount of trash lying on the shoulders and in the adjacent ditches (**as shown in Appendix A**) is unavoidable and greatly diminishes my enjoyment of the scenic beauty which I seek on my regular rides.

These adverse impacts also affect thousands of Oregonians (and especially Benton County residents) who live along major transportation corridors – since trash is hauled to the dump from all over the state. Trash blows into farmers fields and the front yards of homes along the highways. Imagine if your kids went outside to play and were confronted by bags of unknown, potentially toxic garbage lying by your curb. Would any of you honestly argue this wouldn't, *"seriously interfere with the character of"* your neighborhood – or that it, *"doesn't pose an undue burden on public resources"* (like roads, sidewalks, and waterways) that you use and enjoy on a regular basis?

It is important to keep in mind that trash falling on the roadway has significant, adverse safety impacts, too. It is not just about aesthetics. Roadway garbage can cause accidents, as other drivers encounter the debris and swerve to avoid it. On yesterday's ride, I came to a section with dozens of sharp ceramic shards lying in the bike lane (see photo in **Appendix A**). If cyclists fail to see roadway debris in time (which is often the case), we have to either ride through it or suddenly swerve into the lane of travel. Both come with risks (of a puncture or being hit by a car).

The photos shown in **Appendix A** were taken yesterday (4/20/25). Most of them are from a ~one-mile stretch of Independence Highway (located only a couple of miles from the dump). Note these photos are only a small sample of the trash I saw. There were literally THOUSANDS of pieces of garbage (far too many to count). It is clear from looking at the garbage that the majority of it is associated with the hauling of trash to the dump. It is not generally the type of stuff that someone would toss out their windows or lose while driving down the road. The last two photos were taken near the entrance to the dump. The bag of trash lying on the road shows that roadside refuse is a "normal" adverse impact of operating a dump.

To be clear, this roadside refuse (which is a predictable and unavoidable impact of operating one of our state's largest dumps) *seriously interferes with the character of the surrounding area* by greatly diminishing the aesthetics of scenic travel corridors and degrading the quality of adjacent properties (both residential and agricultural). It also places an *undue burden on public resources* (including land and waterways along transportation corridors). As the photos in **Appendix A** show, roadside refuse often collects in the ditches which drain into and pollute local waterways. It is not just a matter of plastics, but the diverse, toxic stew of garbage headed to the dump (things like diapers, oil, and household chemicals which we know are common components of garbage). This pollution has direct, adverse impacts on wildlife, as well as down-stream communities whose drinking water comes from the Willamette River. **All of these adverse impacts would be continued and worsened if the dump expansion were to be approved.**

In case you're thinking, "*Wait a minute – Benton County has a "covered-load ordinance", so shouldn't that address roadside refuse?!"*", I will share a personal experience I had some years ago. I was driving north out of Corvallis on Hwy. 99, right behind a large dump truck. The truck had a cover of sorts, but it was flopping in the wind. Large pieces of insulation kept flying out the back of the truck. I took a number of photos and even a video on my phone showing the debris streaming out of the truck. The license plate was clearly visible. I followed the truck until it turned off at the dump. I spoke to a woman at the scale and told her what I had observed. She told me there was nothing she could do about it, since they technically had a "covered load".

When I got home, I called the Oregon State Police to see if they would ticket the driver for littering. Despite me offering to share my photos and video, they were unwilling to pursue the matter.

I researched the company which owned the truck and found out they were demolishing a building in downtown Corvallis. The garbage they were hauling was coming from that job, which required a permit from the City of Corvallis. I called the City office to report what I'd observed and complain about the company. I was told there was really nothing they could do. Apparently, the issuance of a demolition permit did not impose any constraints on whether or not the applicant followed applicable waste hauling or littering laws.

On several other occasions, I've witnessed people hauling loads of uncovered, residential garbage to the dump (with a loose tarp or piece of plastic thrown on top right before reaching the dump scale). The staff at the dump seldom charge them for having an uncovered load. When I've asked them why, they basically say it's not their job.

These experiences have demonstrated to me that the county's "covered-load ordinance" really isn't very effective in practice. There's no willingness to enforce the ordinance or littering statutes, even when those in charge are presented with indisputable evidence of violations. There is no reason to believe any of this will change in the future. In short, one must conclude that substantial amounts of roadside refuse are a predictable and unavoidable, adverse impact of the operation of the dump.

Approving the expansion would only increase and expand the many adverse impacts of roadside refuse. There is no effective way to mitigate these impacts on the surrounding community. I urge you to DENY the expansion request.

Sincerely,

Doug Pollock
37293 Helm Drive
Corvallis, OR 97330

Appendix A – roadside refuse along Independence Highway and Coffin Butte Road. Most of the photos were taken along a ~one-mile stretch of Independence Highway, on April 20th, 2025.





















































From: [Doug Pollock](#)
To: [Benton Public Comment](#)
Subject: Fwd: Input for DSAC & SWAC re: Coffin Butte Landfill Operations in 2022
Date: Monday, April 21, 2025 3:22:43 PM
Attachments: [Benton County - 2040 Thriving Communities Initiatives Core Values.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Benton County Planning Staff,

Please include this forwarded email (as well as the attached photos and document) as part of the public testimony in OPPOSITION to LU-24-027.

Subject: Testimony in OPPOSITION - LU-24-027: Long History of Waste Violations is Grounds to Deny Landfill Expansion

Dear Benton County Planning Commission,

I am forwarding my email summary (sent to Benton County's DSAC and SWAC on October 5th, 2022), as public testimony concerning the current application (LU-24-027) for expansion of the Coffin Butte Regional Landfill. I am also attaching a sample of photos documenting numerous waste violations in dumpsters throughout our community. I present this history and documentation because it is vital that you understand that our current waste management processes absolutely do NOT comply with state regulations (laws) regarding the disposal of both hazardous materials and (prohibited) electronic waste. This includes the institutions that generate waste (such as the Corvallis School District, Samaritan Orthopedics, and Oregon State University), the Oregon Department of Environmental Quality (that has refused to undertake enforcement actions in response to my complaints), and Republic Services (which lacks any substantive ability to audit or ensure that they are complying with their operating permit for the landfill).

The violations I've documented include the frequent disposal of hazardous materials (such as containers of paint, fluorescent light bulbs, epoxies, industrial solvents, etc.), the improper disposal of refrigerant systems, and numerous violations of Oregon's E-Waste law. The disposal of considerable volumes of inkjet cartridges from Hewlett-Packard's inkjet manufacturing operations is another example which I witnessed (and ultimately changed) firsthand. Prior to my development of their inkjet recycling system in the early 1990's, HP dumped all of the waste cartridges with ink from their Corvallis manufacturing operation into Coffin Butte. HP made the disingenuous claim that the plastic cartridges "contained" the ink, preventing it from leaking into the landfill. 200 TONS of cartridges with ink PER YEAR were being dumped at the time my recycling system came online in the early 90's.

When considering the current application for expansion, you must consider this long history of waste violations that is a hidden legacy of operating a large dump. All of this hazardous material remains in the dump, contributing to the toxic leachate that is dumped in the Willamette River (after minimal "treatment" = dilution by Corvallis Public Works).

Expanding the landfill will only increase the mass of toxic refuse contributing heavy metals, PFAS, and other dangerous chemicals to the leachate. Neither this leachate nor the county's liability for it will not cease to exist when the landfill is closed.

My email below presents a brief overview of the systemic challenges I've encountered in pursuing these issues over the past two decades. In my experience, there is not just a profound lack of will to address these problems, but also a deep-seated, bureaucratic opposition to fixing them. The principal at my son's school once told me, "*We just can't have folks looking in dumpsters!*" in response to the glaring violations I'd uncovered. Another assured me that the item in question (a large TV) could not have come from her school - though a subsequent investigation showed this to be the case. After roughly a dozen years of trying to ignore my reports of violations, the Corvallis School District's final response was to put locks on all of their dumpsters!

Benton County's "**2040 Thriving Communities Initiative's Core Values**" (also submitted as testimony, attached) refers to such commendable things as:

"Vibrant, Safe, & Livable Communities that Promote Creativity, Forward-Thinking, a Sense of Place, & High Quality of Life"

"High Environmental Quality, Conservation of Natural Resources, Consideration of Carrying Capacity, and Easy Access to the Outdoors"

"Communities & Individuals are Prepared to Respond to & Recover from Natural & Human Caused Disasters, Threats, & Changes"

"We Recognize & Will Address the Well-Being of our People by Including Health Considerations in all Policies, Practices, Activities, & Operations"

How do you (or the county commissioners) reconcile these laudable goals with the continued operation of one of our state's largest dumps...a dump with a documented history of violations, including enormous methane releases and millions of gallons of toxic leachate dumped into the Willamette River ecosystem?

How would the expansion of the dump contribute to a, "*vibrant, safe & livable community*", that is, "*forward-thinking*" and shows a, "*sense of place & high quality of life*"?

How would the expansion of the dump support, "*high environmental quality, conservation of natural resources, consideration of carrying capacity, and easy access to the outdoors*"?

Why perpetuate a "*human-caused disaster*" and "*threat*", when you have the authority to mitigate it (by denying the expansion)?

How would approval of this misguided expansion proposal, "*address the well-being of our people by including health considerations in all policies, practices, activities & operations*"?

The only logical answer to these questions is that the proposed expansion is fundamentally at odds with the vision of a thriving community - and therefore must be rejected!

As my decades of experience and photos illustrate, there are numerous opportunities for minimizing the waste (both solid and hazardous/prohibited) going into the dump. What's lacking is the political will and leadership to change the status quo. Please DENY the proposed expansion and send a message that it's time to get serious about minimizing our waste!

Sincerely,

Doug Pollock
37293 Helm Drive
Corvallis, OR 97330

----- Forwarded message -----

From: **Doug Pollock** <timberframing@gmail.com>

Date: Wed, Oct 5, 2022 at 3:02 PM

Subject: Input for DSAC & SWAC re: Coffin Butte Landfill Operations in 2022

To: RAY Linda <linda.ray@co.benton.or.us>

Cc: Ken Eklund <ken@writerguy.com>, vneqs <vneqs@googlegroups.com>, REDICK

Daniel <daniel.redick@co.benton.or.us>, AUGEROT Xanthippe

<xanthippe.augerot@co.benton.or.us>, WYSE Nancy <nancy.wyse@co.benton.or.us>,

MALONE Patrick <pat.malone@co.benton.or.us>, <mayorandcouncil@corvallisoregon.gov>

Hi Linda,

Would you please share this input with both DSAC and SWAC, as well as Benton Co. staff who deal with solid waste issues?

Thanks!

Doug Pollock

Dear DSAC and SWAC members,

I have been actively monitoring dumpsters throughout Corvallis for a couple of decades, with a particular focus on those used by the Corvallis School District (CSD). I have done this because of a personal interest in sustainability, and as a member of the Corvallis Eco-School Network (a group of parents who worked on sustainability issues in our schools). I also worked on environmental issues in my previous career at Hewlett-Packard, where I served as their product steward for inkjet manufacturing. I would like to share some details of my work and the implications for managing solid waste at the Coffin Butte regional landfill. With my decades of hands-on experience, I have a better view than most people when it comes to what's actually going into the landfill.

When I first began my position at HP, they were dumping enormous quantities of defective inkjet cartridges in the landfill. HP was permitted to do this because their site environmental folks argued the plastic cartridge bodies *contained* the ink, thus preventing the chemicals from leaking into the landfill/leachate. I was determined to put a stop to this practice and started developing a recycling process for the scrap cartridges. One of my first steps was to visit the landfill and watch what actually happened to the cartridges. I took a video of a giant dozer crushing huge boxes of them (with ink spraying everywhere) to raise awareness and build support for my recycling process. Soon after word got out about my video, the landfill operators stopped accepting all of HP's waste cartridges. This helped provide the incentive to develop my recycling process (which was eventually expanded worldwide). But for a period of well over a decade, HP dumped substantial quantities of

inkjet cartridges in the Coffin Butte landfill. This is part of the landfill's toxic legacy that people should know about.

Over the past ~15 years, I've also documented a large number of violations concerning waste in Corvallis school dumpsters. This includes numerous violations of Oregon's electronic waste law (e.g. a large television in a dumpster at Crescent Valley High School), and various hazardous waste violations (e.g. 5-gallon buckets of paint, refrigerators, fluorescent light tubes, etc.). In many cases, I provided pictures and sent emails to school district staff (including the facilities manager, principals, superintendent and school board members). My offers to meet with the previous superintendent and her staff to help them improve their recycling and waste disposal processes were consistently ignored. Surprisingly, many of the worst waste violations occurred in the dumpster located at the school district facilities office. In my initial discussion with the CSD custodial manager, I was appalled to discover that he wasn't even aware of Oregon's electronic waste law. He also admitted that the Corvallis School District had never developed process documentation governing the disposal of hazardous waste. Ignorance of the law is no defense, especially when you work for a public institution!

Almost without exception, the responses I've received from school district leaders over the years have been exceptionally poor. Their first response is almost always denial: *"That couldn't have come from our school!"*. In nearly every case, further investigation showed that, indeed, the material in question did come from the school. Their second response is usually defensive in nature: *"What were you doing looking in our dumpster?!"*. The former principal at Mountain View Elementary warned me, *"We just can't have parents looking in dumpsters!"* and implied she could take away my volunteer role managing the school garden. Eventually, the CSD responded to my dumpster complaints by installing locks on all of the dumpsters. They "solved" their waste disposal violations by simply hiding them from the general public.

Earlier this year, I discovered fluorescent light tubes in a large, open dumpster at Crescent Valley High School. The superintendent largely dismissed my email, speculating the bulbs came from a contractor working at the school. I explained this latest incident was part of a pattern of violations I'd documented over the past ~15 years, but neither the superintendent nor school board seemed to care. Over the following weeks, I documented repeated violations (including more fluorescent tubes in a large glass terrarium that presumably came from a science class). In each case, I filed an official complaint with DEQ about the incidents. Despite asking for a follow-up to my complaints, no one from DEQ contacted me until I called a manager and complained. Despite my substantial follow-up efforts (both with school district leaders and DEQ managers), my complaints were predictably dismissed. The DEQ staff person deferred to the CSD facilities manager who provided the usual excuses and knee-jerk responses. The DEQ person noted, *"The school district is going to reinforce locking of dumpsters at their properties to avoid further illegal dumping... This is the extent of DEQ's evaluation of your complaint. Thank you again for your concern. I will close complaint #22-0653 in DEQ's records."* I was particularly frustrated by DEQ's dismissive response because I had provided the case manager (Cathy Brown) with a lot of background information (about the CSD's history of waste violations). She was clearly unwilling to ask hard questions and hold the CSD manager accountable for the violations I had documented.

I've also frequently found waste violations in dumpsters on the OSU campus and at a Philomath school. This includes significant quantities of hazardous chemicals (e.g.

epoxies, paints and solvents), a refrigerator, and electronic devices. I'd be remiss if I didn't also mention the enormous quantities of perfectly functional items that I've observed in dumpsters at our local schools: chalkboards, paper cutters, file cabinets, furniture, scores of bulletin boards, tables, projectors, books, large volumes of clothing (including brand new school T-shirts), science equipment, video cameras, copper wire, new electrical conduit and receptacles, motors, and hundreds of similar items. All of these items could have been easily diverted to Habitat for Humanity's ReStore or OSU's used equipment auction. The CSD's former sustainability coordinator also reported that an entire container load of chairs from Lincoln Elementary was sent to the landfill earlier this year. He had found an organization that was able to reuse them, but the CSD's facilities manager overruled him and had them crushed and sent to the landfill. Sadly, this is how the CSD has operated for decades.

I wanted to share these stories with you because they help to illustrate a number of very important points:

- **There are enormous opportunities to reduce solid waste, but our community leaders and public institutions seem to lack the political resolve to anything about it.** In many cases, 70-80% of the waste in dumpsters consists of items and materials that could be easily diverted for recycling or reuse.
- As my dumpster finds and the history of HP's inkjet cartridge disposal show, **we must assume there's a considerable amount of hazardous waste going into the landfill on a regular basis.** This hidden, hazardous waste stream has been going on for many decades, without acknowledgement by either the landfill operators, county staff, or DEQ (as far as I'm aware).
- **I believe the waste violations I've documented constitute a breach of the landfill's operating permit with DEQ.** In the most recent case involving the dumpster at CV, the dumpsters were apparently still hauled to the landfill even though I reported they contained fluorescent light tubes (which had not been removed). **Without regular audits to ensure compliance, Republic Services has no idea whether or not they are violating their DEQ operating permit.**
- **There are considerable procedural and bureaucratic hurdles to reporting violations to DEQ concerning the landfill and waste disposal.** I spent a lot of time making phone calls and filling out DEQ complaints - and yet they were largely unresponsive and unwilling to take corrective action. This bureaucratic indifference discourages people from submitting complaints.

Though I've focused this message on violations of our laws governing waste disposal, the landfill operation has impacted my life in numerous, adverse ways. This includes offensive odors (on hundreds of occasions through the years), substantial quantities of litter on the roadway and along the roads leading to the landfill, dangerous loads being hauled to the landfill (a neighbor's wife was killed when she was hit by a trailer that came loose from someone returning from the landfill), increased traffic volumes and wear on our roads, and the substantial, irreversible changes to the character of our surrounding community due to the growing size of the landfill operation.

Thanks for considering my input,

Doug Pollock

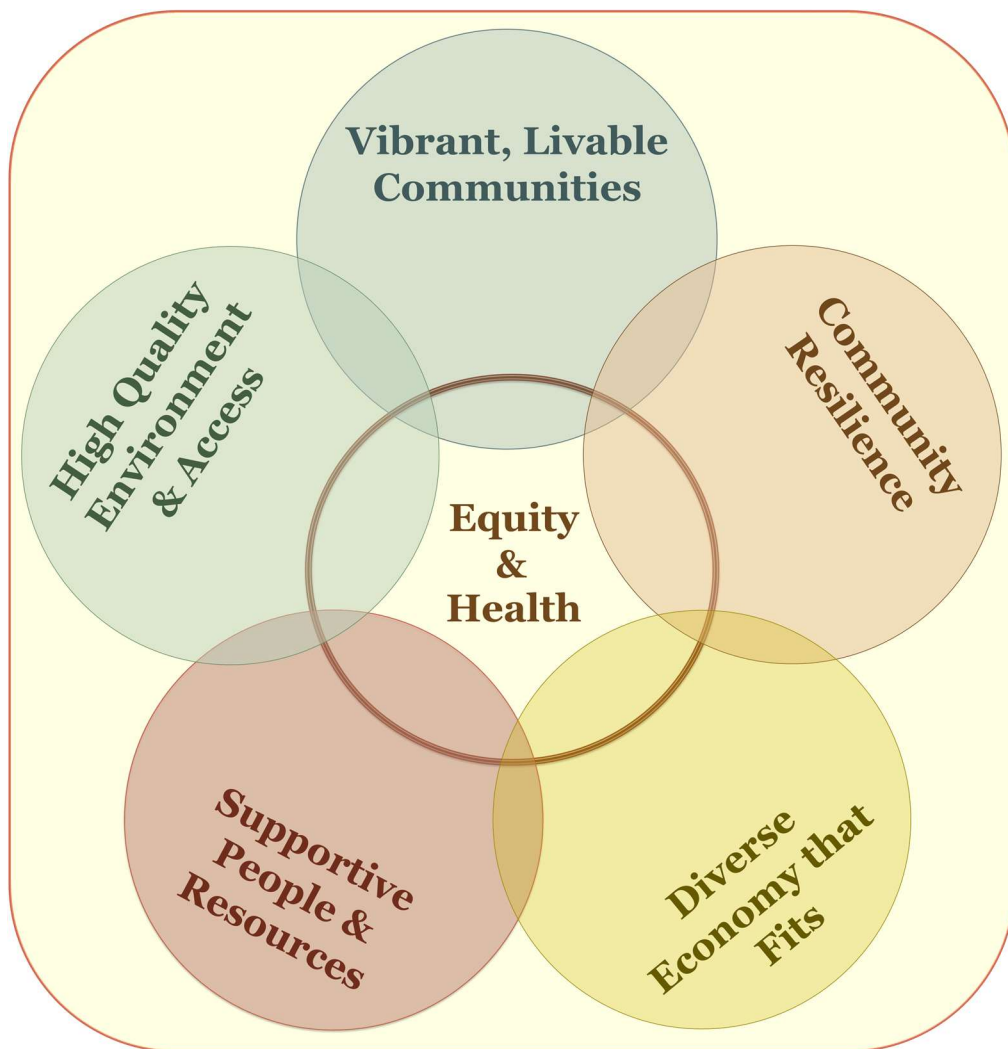
37293 Helm Drive
Corvallis

Benton County

2040 Thriving Communities Initiative

Ensuring Communities' Core Values Today & for Our Future

A community-driven initiative to secure what we like about where we live and to guide efforts to ensure our Core Values now and in the future



February, 2018 – Final Language



Benton County's 2040 Thriving Communities Initiative's Core Values

***Based on the Principles of Equity & Health,
Benton County Strives to Ensure:***

"Vibrant, Livable Communities"

***Vibrant, Safe, & Livable Communities that Promote Creativity,
Forward-Thinking, a Sense of Place, & High Quality of Life***

"Supportive People & Resources"

***Welcoming Communities that Actively Build Social Connections,
Personal Interactions, & Community Resources that Foster Belonging***

"High Quality Environment & Access"

***High Environmental Quality, Conservation of Natural Resources,
Consideration of Carrying Capacity, and Easy Access to the Outdoors***

"Diverse Economy that Fits"

***A Diverse, Robust Economy that Inspires & Stimulates Local Business,
Entrepreneurship, Innovation, & Opportunities***

"Community Resilience"

***Communities & Individuals are Prepared to Respond to &
Recover from Natural & Human Caused Disasters, Threats, & Changes***

Equity for Everyone

***We Appreciate the Inherent Value of Each Community Member,
Honor Differences, Celebrate Diversity, & Foster Inclusion***

Health in All Actions

***We Recognize & Will Address the Well-Being of our People by Including
Health Considerations in all Policies, Practices, Activities, & Operations***