

**From:** [commercial@twinfern.net](mailto:commercial@twinfern.net)  
**To:** [Benton Public Comment](#)  
**Cc:** [commercial@twinfern.net](mailto:commercial@twinfern.net)  
**Subject:** RE: Public Comments on LU-24-027, Coffin Butte Landfill CUP  
**Date:** Wednesday, April 23, 2025 4:39:33 PM  
**Attachments:** [Pease Coffin Butte Testimony.pdf](#)

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Dear Benton County Development Department,

On April 21, 2025 I sent the following e-mail to you with the attached public comments regards the Coffin Butte Landfill, which was supposed to include all public comments received through April 22, 2025. However, I did not receive a confirmation that you received my comments and **did not find the comments in comments portion of the Staff report.**

Can you please confirm that you have received my comments and will include them in the public record?

Thank you very much for taking the time to verify this information.

Warm Regards,  
Grant Pease

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**From:** commercial@twinfern.net  
**Sent:** Monday, April 21, 2025 12:50 PM  
**To:** publiccomment@bentoncountyor.gov  
**Cc:** commercial@twinfern.net <commercial@twinfern.net>  
**Subject:** Public Comments on LU-24-027, Coffin Butte Landfill CUP

Dear Benton County Development Department,

My name is Grant Pease and I live at 3505 NW Marshall Dr., Corvallis, OR 97330. My return e-mail is [commercial@twinfern.net](mailto:commercial@twinfern.net).

Please find attached my public comments and testimony with respect to the proposed Coffin Butte Landfill CUP, LU-24-027.

Please confirm receipt of this message and the single pdf attachment for inclusion as Public Testimony for the above application and let me know if you need additional information.

Thank you very much.

With warm regards,  
Grant Pease

Grant Pease  
3505 NW Marshall Dr.  
Corvallis, OR 97330

April 21, 2025

Subject: Deny Conditional Use Permit for Coffin Butte Landfill Expansion, LU-24-027

Dear Benton County Planning Commissioners,

About 30 years ago I interviewed for a job at HP, considering returning to the area where both my father and grandfather attended college. After the interview, I drove out of town to see what the area was like, taking a backcountry route North on Independence Hwy, over to 99W North, then to Airlie Rd and eventually back on Tampico Rd. That spectacular drive cemented my desire to move to Corvallis, and specifically to the Lewisburg area where I now live.

Now, 30 years later I enjoy taking in the natural wonders of our County close to my home. I like to visit EE Wilson Natural Area, an open space area adjacent to Coffin Butte Landfill for bird watching, berry picking, and biking. I, like many Benton County residents, also often bike in the area surrounding the landfill including Tampico Rd, Coffin Butte Rd, Camp Adair Rd, and Independence Hwy.

If the application is approved, and the Coffin Butte Landfill expands, the character of the surrounding areas will change for the worse and it will create a burden to public improvements in the area. Therefore, I strongly urge you to reject the application.

Specifically, the application fails to meet the County development code in at least the following ways:

**Proposed CUP would violate BCC 53.215(1) by changing the character of EE Wilson Wildlife Area and Surrounding Areas.**

The proposed landfill expansion will negatively impact Benton County citizens' enjoyment of the Open Space zoned area of EE Wilson Area which serves the public with recreational opportunities including archery, shot gun shooting, fishing, bike riding, wildlife viewing, and education as an "outdoor classroom". The expansion will negatively impact the natural character of this Open Space area as the expansion will increase the well documented stench coming from Coffin Butte on some days. It will also degrade the visual character of the EE Wilson resource and increase noise— making a trip to EE Wilson much less attractive. Thus, the expansion would be a clear violation of BCC 53.215(1) because the additional increase in smell, visual blight, and noise from the landfill expansion will seriously interfere with the character of the EE Wilson Wildlife area as it relates to recreational and educational use.

Below, I will focus specifically on the odor issue, though the others are important as well. In essence, Applicant makes the following logical arguments in their Burden of Proof document and subsequent Frist Addendum.

1. There is no existing odor problem.
2. The proposed landfill expansion will increase nuisance odor chemicals by approximately a factor of 2X.
3. Because the 2X odor chemical increase is still below what they believe to be detectable, the expansion will not cause any change of character to the area.

The argument falls apart because there is an ongoing odor problem, and Applicant's own models show that that it will get worse by approximately 2X if this application is approved.

There is an existing odor problem, as anyone who lives, works, or recreates in the area knows. This has been documented, for example, by DEQ and the Coffin Butte Landfill Community Concerns Annual Staff Report, 2023. The fact that Applicant does not replicate the problem through modeling does not prove that there is not a problem.

It's possible that Applicant's odor analysis is faulty for two reasons:

Use of complaint data is not a valid approach to gauging citizen's olfactory experience; the actual experience is likely to be much worse than detected through complaints. There are many reasons why each person who experiences an odor is a nuisance does not complain, including not knowing where or how to complain, believing that complaining would have no impact, and being too busy with other things.

As one example, Applicant states that the following complaint was a "likely" valid complaint:

*"As I was driving past the Coffin Butte dump on Coffin Butte Road in Benton County, OR on Sunday morning the stench was so strong that I has (sic) to put the car's air on recirculate until I was well north of the dump. It was equally as terrible on my return trip past the dump at about 6:30 PM on 12/29/24 and was smelly even on recirculate well past the Tampico/Soap Creek"* [First Addendum, March 15, 2025, Appendix 1, Pg 5].

This complaint, that Applicant views as "likely" valid, represents the experience of many people -- that is, most everyone driving on 99W near that time -- and yet it is recorded only once. We have no way of knowing how many people smelled the same nuisance odor during that day.

A better way to gauge citizens' experience would be to conduct a scientifically valid survey, including control groups. To my knowledge this has not been done.

In addition, Applicant notes that thermal inversions can be a contributing factor to odor complaints, but that they did not take thermal inversions into account when evaluating odor complaints because they lacked the meteorological data to do so. One reason that Applicant does

not find some odor complaints to be valid may be that they could not take into account thermal inversion impacts.

Therefore, because the complaint sampling does not represent our population's olfactory experience and because thermal inversion meteorological data was not taken into account during modeling of the complaints, Applicant's conclusion that the existing landfill does not have significant odor issues is not supported.

Rather, our community knows and has documented that there is an existing odor problem.

Next, Applicant's modeling shows that the most important chemical odor contributors will increase by approximately a factor of 2X if the expansion is approved. [Page 19 of CBLF 2024 Expansion Application Odor Dispersion Modeling Study.] Applicant focuses on the fact that the absolute value of nuisance chemicals in their model is currently, and will be continue to be, under detectable limits in the proposed expansion [Pg 25 of CBLF 2024 Expansion Application Odor Dispersion Modeling Study]. However, we see from above that their model of the existing issue, at least with respect to residents being able to smell the landfill gases, is very likely incorrect.

**The important takeaway from the 2024 CBLF Odor Dispersion Modeling Study is that whatever odor problem exists today will be about twice as bad if the expansion is approved.**

The odor problem is already bad and with the expansion would get worse, degrading the character of the area.

#### *Proposed Odor Mitigation Is Not Sufficient*

As one proposed mitigation step, applicant proposes Odor Mitigation and Monitoring [OA-10 of Exhibit 21]. There are two problems with the proposed mitigation:

First, Benton County has no way of enforcing the proposed Mitigation and Monitoring. Applicant does not propose any enforcement mechanism and, as Commissioners know, Oregon DEQ has the sole statutory authority to regulate in the area.

Second, the proposed odor mitigation makes very little mention of the monitoring process, or proposed mitigation steps. They propose to make summary monitoring results public annually. As a minimum, if this application is approved with conditions, VLI should be required to (1) to meet a detailed County-mandated monitoring program designed by a mutually agreeable external group with County input, (2) mitigate issues quickly with financial penalties if the mitigation is not successful as shown by subsequent monitoring, and (3) make all monitoring raw data immediately publicly available.

**Proposed CUP will likely violate BCC 53.215(1) and BCC 53.215(2) because of the impact to local roads.**

As a bike rider, the proposed expansion will have dramatic negative impacts on the character of the area and my use and enjoyment of the surrounding public roads. Because the daily intake of trash is likely to increase, there will be traffic from hauling trash and leachate, smell, and dust on the public roads – even if one stipulates that VLI fulfil their obligations to meet relevant state and federal environmental regulations. These negative impacts are made more certain with the likely elimination of any annual cap on landfill intake tonnage with the approval of this CUP. The number of trucks per day, noise, and smells will go up with daily volume. These changes would be in violation of BCC 53.215 (1) and 53.215 (2), interfering with Benton County bike riders' use and enjoyment of the adjacent roadways and will create a burden on the public improvements and the services available to bike riders in the area.

## **Conclusion**

Like my grandfather and my father, I have enjoyed the country feel of the North Corvallis area in the 30 years since I moved here. I hope that together our community will keep this area as a place for living, recreation, and wildlife.

**Because the expansion would violate BCC 53.215(1) and BCC 53.215(2) in several ways, I urge you to reject this Conditional Use Permit to expand operations.**

Respectfully,

Grant Pease  
3505 NW Marshall Dr.  
Corvallis, OR 97330