

From: tweet37@juno.com
To: [Benton Public Comment](#)
Subject: LU24-027 testimony in Opposition, Request Record be Held OPen from April 29 25 BCPC Hearing
Date: Tuesday, April 29, 2025 4:43:45 PM
Attachments: [LU24-027 April 29, 2025 testimony in Opposition one Staff Report error notice, Request to Hold the Record Open R.Foster.rtf](#)

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Thanks.

April 29, 2025

Public comment in Opposition to the record
LU24-027

Dear BC Planning Commission,

I am opposed to this Landfill expansion.

Please keep the RECORD OPEN for x days and share to the public how this will work legally, or time wise please with a Hearing on May 1, and May 6.

Thank you very much for your time and extensive patience with all our public comments to the record.

Correction request for Staff Report at:

Staff Report E20 page 15. Jan 15, 2025 update Preliminary Conditional use approval contains 'E20 Fire Risk Assessment Report 09.24.24 and Addendum 01.15.25' on page 15. This citation to this material appears to be in the wrong place in the Staff Report.

I concur with Faye Y. in Part1 of 6 public comment folder.

“The next generation of Benton County residents, possibly including the students involved in these monitoring efforts, will live with the discretionary decision (criteria 53.210) you take now to approve or deny this CUP application. From the far-reaching implications of methane and other air pollutants to the toxic leachate diluted and released into the Willamette River, together seriously interfere with the character and quality of life in our community and all those who live downstream (criteria 53.215). Landfills are yesterday's technology and better solutions are being advanced in many municipalities. Allowing Republic Services to continue to expand, especially in such an ill-suited geography, delays their adoption of new technologies and practices while the impacts on our health, safety and climate continue to grow.”

I concur with Dr. Abigail Haberman in Part3 of 6 public comment folder. Dr. Haberman offers simple suggestions on how to make positive changes in our community and globe with relation to our trash issues.

With 12-18 years left in Cell 6 closure plans should be considered instead of expansions. These 12-18 years buys time to work on a truly useful and workable, factual, cost effective for the Environment, area residents and creates global climate friendly solutions for Oregon and for Benton County for our trash, recycling and reuse of our toss away economy.

BC should not become the trash capital of Oregon with unlimited dumping in LU24-027. BCC23.325.2

Passage of LU24-027 will only extend the problems into the future from this site for needing to develop new Methane capture and reuse in an expanded Commercial card lock methane filling station, and a private expanded co-generation power plant facility at CBR.

Expanding trash storage will generate increases volumes of methane, leaching of more types of toxic and hazardous wastes from trash put into this expansion landfill with no one watching, and no one auditing to what is being land filled. BCC53.215.1

With new and old forever chemicals increasingly coming to market in products we buy, PFAR in leachate and in the air we breath around the landfill and beyond is a documented air pollution problem. CP6.1.2 6.1.4

Landfill derived Leachate containing PFAR and a list of testable chemicals is trucked to multiple waste water plants in the area, deacidified, diluted and put into the Willamette River.

Short Mountain Landfill leachate contains 98 VOC, 27 metal salts and 117 Inorganic compounds that are tested for. The BOP for LU24-027 presented a one page listing of Volatile Organic Compounds at 22 compounds.

BOP Tuppen Environmental Report in LU24-027 is missing the rest of the chemical report for leachate chemical composition testing. Many of the chemicals found in leachate at CBRL are currently baned chemicals, noted an area chemist.

Leachate mitigation procedures should be considered for removal of these contaminants if they are above the EPA regulatory level of x mg/liter. But all leachate contaminants should be removed at the landfill site itself using the various purification technologies that exist today, and be paid for by the

landfill owner in conjunction with some other forms of financial incentives to treat leachate on site.

Currently, DEQ and EPA let companies like Short Mountain Landfill and Republic Services to paying various Municipal waste water plants to dilute and deacidify leachate and pump it into various Oregon river's where, the next municipal water supply is withdrawn and residents consume diluted landfill leachate, a probable health concern, in low doses over decades may add up to significant health concerns.

In Benton County, SWAC should be reinstated and begin work together with DSAC and ENRAC to develop a landfill closure plan and map out how trash can move from Benton County and 21 other Counties, one Washington City and Two Oregon Cities to the Columbia Gorge to either the Washington Site where Republic Service owns another landfill, or to the Oregon side landfill.

The Franchise hauling agreement designates trash service to Benton County up to the renewal date of this contract.

Leachate tanker trucks work all year, every day from Coffin Butte. The diesel used to transport leachate is significant and increases global climate deterioration. Republic is not offsetting their carbon foot print that I have heard, to support the emission into the environment from millions of miles traveled hauling landfill leachate to Salem and other are waste water treatment plants.

Traffic from unlimited dumping may not be fully analyzed in the Traffic Study for LU24-027.

Wear and damages to area roadway will increase and cost the Counties more in repair costs to maintain the roadways where x more heavy trash trucks will be driving in mass, for more hours of operation if Republic requests that they have extended operation hours. Republic Services is currently open for, and out of compliance with existing Conditioned operational hours set forth by BC.

Republic Services is already in violation of Condition of Approval which defined operating hours.

Trash lost along all roadway coming to CB will increase and beautiful byways of Benton County will further degrade with Oregon trash pick up service using the man/women power and time of Oregon and Washington inmates will be kept busy.

Trash billing for me went up Feb 20, 2025 inside City of Corvallis to 2.20 cents so this was new, with the reason on the bill, price increase in January 2025 “due to multiple inflationary factors”. I asked Republic phone operators for the reason for trash rate increase and was given none. I asked Julie Jackson about the reason for this rate increase and I did not hear back from her.

A survey done by Corvallis of trash rate payers shared that they would pay 1-5\$ per month more for electric trash vehicles. The City of Corvallis have one electric trash truck reporting to be purchased, this year, by I assume Republic Service for use inside I assume City of Corvallis, city limits. City of Corvallis did not initiate a rate hike to pay for this electric trash truck in 2025.

Republic Service presented City rate payers 4.7% one time rate increase at the start of the Franchise hauling agreement resulting in 0.99 Cent /month for every 32 gallon can picked up. Ordinance 2013-06 Jan 1, 2024 effective start date 9.6% or a 2 dollar increase.

For our trash bills, we do not see what we are paying for, so are in the dark about even the existence of the CBRLandfill. Out of sight, out of mind. Travel north and enjoy the view, the smells and interesting odors so strong that they force you to close your car windows. Watch the working of this landfill and try to envision it filling the entire valley. Watch as all sorts of predatory and scavenger birds use updrafts from the landfill and from Coffin Butte and Tampico Ridge to fly and land I assume at multiple open waste dump working faces to feed on wastes we toss out, or on dead animals collected to bury at CBRLandfill and other wastes that could be consumed by birds, coyote, fox, rats, cats, skunk, raccoons. These wastes could have toxic materials mixed into them and create problems for our birds and wildlife which use this landfill as food sources.

Sunshine Canyon Landfill at Granada Hills, in the San Fernando Valley residents have to live with Republic Service landfill that emits landfill gas

odor sharing “What happens in the landfill happens in our houses. And we’re stuck with this stinking landfill until 2037.” Jane Williams executive director of California Communities Against Toxics, ... said she doesn’t believe the operators are doing nearly enough to protect the community. “Everyone knows that this landfill is completely out of control,” she said. Los Angeles Public Press 3/11/2025 by Ashley Orona and Dan Ross

Odor and PFAR full air particulate in landfill gases could be impacting workers at this landfill, operators who haul trash here and area recreational users, wildlife, area residents and children who go to school at Adair Village. PFAR is known to be leaving landfills in escape gases emitting into the atmosphere. CP6.1.2 - 6.1.4

PFAR could be in area dust that lands on one persons who testified home in NE Corvallis. Landfill Odor may cause cancer if exposure is long enough as it contains all sorts of possibly fully identifiable chemicals that are not presented in the BOP Environmental Analysis by Mr. Tuppan.

With DEQ set to take public comment for the TitleV ACDPermit for Republic Service for renewal of 2014 TitleV ACDPermit, for the operation of CBRL, in May 23, 2025 by Five P.M. 2025. Hopefully the DSAC and ENRAC can comment to this permit for Benton County.

More area wetlands will be lost with this landfill expansion. Wetlands are mapped under the north landfill area, under trash, and where did these wetlands get mitigated at?

Where will the wetlands in all the tax lots for this expansion be mitigated at?

Recreational use at E.E.Wilson, Dunn Forest, Soap Creek, Tampico Road, Adair Village, Santaim Christian K-12 School, North Albany, North Corvallis, Arlie, north Coffin Butte area, South Polk County Rural Residential land owners, farmers, pets, farm animals, area soils, area wetlands at E.E. Wilson, Soap Creek, Willamette River, wildlife, are all negatively over time, being impacted by operation of this landfill.

Human residents, and wild animals, birds, ect, our livestock, our pets also have to encounter odors from this landfill as livestock are outdoors 365 days a year.

We and area animals and wildlife all have to come to except the mental and physical stressors of increased area noise from operation of this Regional Landfill from x to y time per day per week, per year. We have to be impacted by more area light pollution, truck traffic congestion, have our health damaged by unknown constant release of trash truck road chemical spills, and look constantly at roadside trash. Sadly see our view shed deteriorate as the trash cells climb to over the Conditioned height limit of 500 feet as mapped in LU24-027 at currently 550 feet.

We all must be aware of ongoing air quality concerns, for dump derived air pollution we can not smell, and learn more about PFAR and other hazardous particulates blowing out of from the operation and storage of landfill contents.

Fire from inside landfill occurs at a regular basis, and reporting of landfill fire inside the cells should be of great concern to Benton County for the health and safety of area residents, who sensitive to being exposed to this ever more toxic trash fire caused air pollution.

Air quality declines in any form is trespassing onto peoples land and into their homes and with expansion, air quality can only increasingly get worse, when unlimited dumping bring in trash from more counties, and potentially more States. A site plan for this landfill with unlimited dumping should be shared before passage of LU24-027 seals the deal with Republic Services to being in trash from other Counties, or from other industries in Oregon as their toxic or hazardous waste materials to be stored in this Regional Landfill.

What will be used for Daily cover for three working landfill faces at CBRLandfill? The closure of Covanta Marion, Reworld has I assume currently stopped the use as daily cover of toxic Fly Ash from the medical waste to energy burner in Brooks, Oregon?

What types of Daily cover are planned to be used for all three working landfill if the expansion goes forward?

Pollution monitoring off site would be an important step to undertake to determine how far off site the environment is being compromised by the

expansion of this landfill through time. Currently the DEQ does not test for soil, air or water contaminants off the Landfill zone tax lots for the landfill.

The expansion landfill may have long term damaging contamination impacts to area water wells, as the Geological evaluations in LU24-027 concludes that the expansion landfill would not have any affect on area wells.

Geological evaluations as geotechnical modeling did not take into account the type of Tampico Ridge subsurface geology that may allow any liquid to migrate, to move though layered geology of the Basalt and Sandstone ridge, to move downhill into the surrounding rural residential land owners properties on and around Tampico Ridge. Area wetlands, spring and seasonal creeks will also be impacted and these have also not been well studied in the face of this expansion planning.

More study needs to occur to confirm the applicants Geological evaluations and Geotechnical modeling conclusions support safety and sanity of area water well owners who live next to this propose expansion site, put deep into the north slope face of Tampico Ridge.

Tampico Ridge has springs and water tables all along it, so drilling and blasting into this ridge could very easily result in potential damaging many area well water tables already in use in this area, dewatering these established water well water tables which supply drinking water and Agricultural irrigation water to area homes on Tampico Ridge and to residences who live along the flanks of Tampico Ridge. BCC99.800-99.850

Well water testing, establish Control set of data then test per year and mitigate if test find contamination from LU24-027

A Condition of Approval could be created to establish a baseline well pressure data set and well water chemical assay data set that documents a Control set of data/well water chemistry, for all area wells which may be impacted and become unusable with LU24-027 operation over 4- 5 years of operation.

Upon closure, of LU24-027 the applicant may file a CUP to expand LU24-027 to the north, and see to store trash on top of LU24-027 up to a known elevation to the south, in order to connect trash cells to the existing historic North landfill Cell slope that is not being revegetated, at this time, and close Coffin Butte Road as was proposed in 2022 Expansion CUP application.

In this Well water pressure and chemical assay this Condition of Approval, must require that Republic Services pay to establish a base line well water pressure and chemical data set and have these wells around this and the next expansion at this same location, must be tested every year for new chemicals and for decreases in pressure, until the landfill closes and a new contract for well water testing will need to be developed with a new landfill management contractor who is paid to take care of the Closed CBR Landfill.

If under this Condition, which has not expiration date, any local Tampico Ridge area well data shows contamination from LU24-027 to area drinking water and Ag use wells, then Conditioned directions that do not expire, require that Republic Services or who ever owns this landfill, pay each landowner to redrill a new uncontaminated well, to support the well that is no longer useable, or to pay for the same amount of water to be delivered to each of the well owners in perpetuity, whose water testing report finds new never before seen chemical contamination associated with LU24-027 in area drinking and Ag wells in the Tampico Ridge area Rural Residential Wells used for Drinking water and Ag irrigation. BCC23.325.2 Undue Burden on Public infrastructure Facilities and utilities.

Benton County can work on regional Solid Waste Management Plan(SWMP) to get it moving along, and we can recycle our waste more effectively and efficiently possibly to become less dependent on tossing recyclable material as resources into this landfill.

Reclaiming materials in an EMRF would be a good first step, and would support more local and regional recycling industrial businesses for household recycling. Buying local and buying less plastic would help cut back on plastic waste generation., and gas and oil needed to make and transport materials from across the planet.

With trade tariff issues starting, prices for materials from China and a long list of every other trade partner with the U.S. is costing consumers more, and will possibly lead to products from overseas, not being available or will be too high a price to purchase and create a reduction in waste stream that we all have to toss out. .

Corvallis Sustainability Coalition is a great fit for working on a regional SWMP, together with SWAC, DSAC, BCP Commission and BOC. Waste

haulers from other areas could offer their price lists for pick up of recyclables as well to compete against Republic Service pricing to deal with Recyclables being reclaimed in all 22 Oregon Counties two Oregon Cities and one Washington City that ships trash to CBRL.

Equal and effective recycling education programs and training for area residents would be nice to have occur so that everyone is on the same page in their ability to recycle materials in all 22 Oregon Counties, two Oregon cities and one City in Washington who do business with CBRLandfill. Why is this landfill expanding so quickly? What is going into this landfill and is it over the tonnage cap every year to be growing at such a rapid rate?

Currently the only one paying for upkeep of CBRL will be Benton County tax payers, I assume, if the Environmental Trust Fund for Closure is still able to pay for closure. I assume taxes from BC and area City taxes for Franchise Fees, possibly will also help support the BC Environmental Trust fund to pay for liability and for long term costs of maintain a massive landfill built in the wrong location at closure.

Valley Landfill Inc the parent company of Republic Services has no financial ties to this landfill, so when this semi large landfill closes, no one will be responsible for it but Benton County residents paying taxes into the liability or closure support fund.

Hiring Republic Services to maintain this landfill at closure will cost the County x projected dollars per year, starting in x year, as no other County or city will be paying into the closure CBRLandfill Liability fund and to pay a waste management and engineering firm to maintain this closed landfill they(Republic Services) created to support their investors.

Restoration of area waste drop off sites in Rural Benton County should be strongly considered, to resume, in Benton County, to allow residents to recycle with ease instead of tossing these materials in their trucks to make a dump run, and pay by the pound to bury recycling materials in this landfill. Benton County 2040 Vision statement should back up the need to restore rural Benton County trash transfer stations.

Schools are tossing out useful stuff, and do this daily. Informative training/waste audits with meetings or informational findings from trash audits done at schools can develop information about what is tossed out, and