

From: [Mark Henkels](#)
To: [Benton Public Comment](#)
Subject: Comment in Opposition to Landfill Expansion
Date: Tuesday, April 29, 2025 4:47:04 PM
Attachments: [MPH Coffin Butte Testimony April 29.docx](#)

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I also have attached this. It is the text of my oral testimony.
Mark Henkels, <mphcorvallis@gmail.com>

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**Testimony in Opposition to Coffin Butte Landfill Expansion:
Application file number: LU-24-027**

April 29, 2025

My name is Mark Henkels. I am a former professor of Public Policy and Administration at Western Oregon University. I participated in the Benton County Talks Trash (BCTT) process, serving on the Community Education Subcommittee and helped write the history section of that document.

History and contemporary experience demonstrates that the expansion will definitely interfere with the character of the area and impose an undue burden on facilities and services available to the area.

The background and history told in the BCTT document show that Coffin Butte became a major industrial facility rather accidentally and reveals many problems in its operation.

Benton County approved the formal creation of the landfill to divert wastes that were previously placed in the forests and rivers without effective control. By the 1970s, problems with Coffin Butte even led Corvallis Disposal to negotiate a 99-year lease on another unsuitable site near Highway 20 in 1970 that was never used.

Early expert opinion on the suitability of Coffin Butte as a dump can be seen in the BCTT passage that states:

“In the March 19, 1971 Gazette-Times, County Sanitarian Roger Hayden speculated that one day soon Benton County may be barging its wastes down river to a regional site where proper sorting and recycling could take place. Hayden suggested at the time that eventually local solid waste would have to be taken to the eastern side of the state since western Oregon had location, water, and soil condition difficulties.”

Much has been said about how Coffin Butte is a “regional dump”, but this “status” was created in the early 1970s when Benton County and surrounding counties planned for it to close by

2000. The “Chemeketa Agreement” also stated that only wastes from specific areas of Polk, Benton, and Linn County would go there. Not Marion County, and certainly not Washington County and beyond where much of the current waste come from. Coffin Butte was a convenient solution for that time but never considered ideal, even when the vision was of a facility operating at a small fraction of the current volume.

One of the main themes of the BCTT history section states: *“Historically, the interests of landfill owners and operators and those of the neighbors and other Benton County residents have not always coincided.”* The evolution of the landfill from a small regional facility overseen by local businesses to the second largest landfill in Oregon controlled by a giant out-of-state corporation tremendously magnifies the impact on neighbors and Benton County residents. Even in the period of 2010-2014, the flow of refuse was less than half of current 1 million tons being deposited per year. This cap will be lifted should the expansion be allowed.

The consistency of public opposition to efforts to expand reflect the public’s awareness of how inappropriate a massive landfill is in that location, and has been consistently reinforced by expert information and scientific studies.

Two closing points. First, the landfill has leaked into aquifers of the area. As the BCTT report noted, such intrusions into local wells led the operators to buy the neighboring Helms property in the 1980s.

Finally, Benton County residents should not rely on any added “conditions of approval” that appear to mitigate risks. Consider how the EPA and state environmental inspectors have found methane leaks from the cover that far exceeded Republic Services’s self-reported leaks. Benton County has avoided establishing their own monitoring program, Oregon is just now showing interest in this issue and certainly the US EPA will not prioritize such things. We would be fools to rely on Republic Services for this reporting.

The expansion will open large surfaces above and below ground for more decades, creating vulnerability to leaks, and health, fire, and the global environmental risks.

Sadly, a USGS publication notes that the EPA has concluded that all landfills eventually will leak into the environment. (<https://pubs.usgs.gov/fs/fs-040-03/pdf/fs-040-03.pdf>).

I hope you recognize how even the existing operation violates the character of the area and the environmental values stated in our County codes. It’s time to draw a permanent limit for the landfill.

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Benton County approved the formal creation of the landfill to divert wastes that were previously placed in the forests and rivers without effective control. By the 1970s, problems with Coffin Butte even led Corvallis Disposal to negotiate a 99-year lease on another unsuitable site near Highway 20 in 1970 that was never used.

Early expert opinion on the suitability of Coffin Butte as a dump can be seen in the BCTT passage that states:

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Much has been said about how Coffin Butte is a “regional dump”, but this “status” was created in the early 1970s when Benton County and surrounding counties planned for it to close by 2000. The “Chemeketa Agreement” also stated that only wastes from specific areas of Polk, Benton, and Linn County would go there. Not Marion County, and certainly

not Washington County and beyond where much of the current waste come from. Coffin Butte was a convenient solution for that time but never considered ideal, even when the vision was of a facility operating at a small fraction of the current volume.

One of the main themes of the BCTT history section states: *“Historically, the interests of landfill owners and operators and those of the neighbors and other Benton County residents have not always coincided.”* The evolution of the landfill from a small regional facility overseen by local businesses to the second largest landfill in Oregon controlled by a giant out-of-state corporation tremendously magnifies the impact on neighbors and Benton County residents. Even in the period of 2010-2014, the flow of refuse was less than half of current 1 million tons being deposited per year. This cap will be lifted should the expansion be allowed.

The consistency of public opposition to efforts to expand reflect the public’s awareness of how inappropriate a massive landfill is in that location, and has been consistently reinforced by expert information and scientific studies.

Two closing points. First, the landfill has leaked into aquifers of the area. As the BCTT report noted, such intrusions into local wells led the operators to buy the neighboring Helms property in the 1980s.

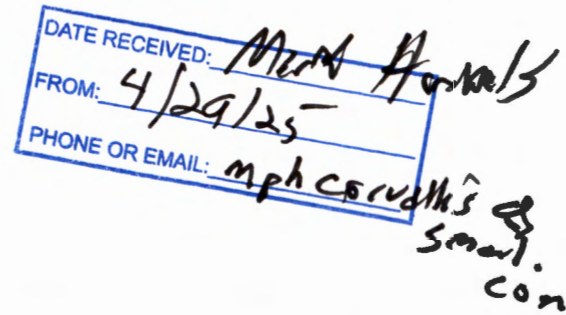
Finally, Benton County residents should not rely on any added “conditions of approval” that appear to mitigate risks. Consider how the EPA and state environmental inspectors have found methane leaks from the cover that far exceeded Republic Services’s self-reported leaks. Benton County has avoided establishing their own monitoring program, Oregon is just now showing interest in this issue and certainly the US EPA will not prioritize such things. We would be fools to rely on Republic Services for this reporting.

The expansion will open large surfaces above and below ground for more decades, creating vulnerability to leaks, and health, fire, and the global environmental risks.

Sadly, a USGS publication notes that the EPA has concluded that all landfills eventually will leak into the environment.(<https://pubs.usgs.gov/fs/fs-040-03/pdf/fs-040-03.pdf>).

I hope you recognize how even the existing operation violates the character of the area and the environmental values stated in our County codes. It’s time to draw a permanent limit for the landfill.

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History and contemporary experience demonstrates that the expansion will definitely interfere with the character of the area and impose an undue burden on facilities and services available to the area.

The background and history told in the BCTT document show that Coffin Butte became a major industrial facility rather accidentally and reveals many problems in its operation.

Benton County approved the formal creation of the landfill to divert wastes that were previously placed in the forests and rivers without effective control.

Even in the early 1970s Valley Landfill was looking for alternate sites and early expert opinion on the suitability of Coffin Butte can be seen in the BCTT passage that states:

"In the March 19, 1971 Gazette-Times, County Sanitarian Roger Hayden speculated that one day soon Benton County may be barging its wastes down river to a regional site where proper sorting and recycling could take place. Hayden suggested at the time that eventually local solid waste would have to be taken to the eastern side of the state since western Oregon had location, water, and soil condition difficulties."

Even the "Chemeketa Agreement" making Coffin Butte a "regional landfill" envisioned it would close by the year 2000 and that only wastes from specific areas of Polk, Benton, and Linn County would go there. Not Marion County, and certainly not Washington County and beyond where much of the current waste come from. Coffin Butte was never considered ideal, even when receiving much less waste.

The BCTT history section notes that: *“Historically, the interests of landfill owners and operators and those of the neighbors and other Benton County residents have not always coincided.”*

The evolution of the landfill from a small regional facility overseen by local businesses to the second largest landfill in Oregon controlled by a giant out-of-state corporation tremendously magnifies the impact on neighbors and Benton County residents.

Consistent public opposition to expansion reflects the public’s awareness of how inappropriate a massive landfill is in that location, and has been consistently reinforced by expert information and scientific studies.

Finally, Benton County residents should not rely on any added “conditions of approval” that appear to mitigate risks.

Consider how the methane leaks found by the EPA and state environmental inspectors just recently far exceeded Republic Services’s self-reported leaks. No government bodies consistently monitor and enforce landfill regulations, and we would be fools to rely on Republic Services for this reporting. The expansion will open large surfaces above and below ground for many decades, creating vulnerability to leaks, and health, fire, and the global environmental risks.

Sadly, a USGS publication notes that the EPA has concluded that all landfills eventually will leak into the environment. (<https://pubs.usgs.gov/fs/fs-040-03/pdf/fs-040-03.pdf>).

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