

**From:** [Carol McClelland Fields](#)  
**To:** [Benton Public Comment](#)  
**Subject:** Oppose/Deny LU-24-027 -Written Testimony  
**Date:** Tuesday, April 29, 2025 4:16:42 PM  
**Attachments:** [Written Testimony - LU-24-027 - Carol McClelland Fields.pdf](#)

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*Carol McClelland Fields*

*37326 Soap Creek Rd,  
Corvallis, OR 97330*

Thank you.

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**Carol McClelland Fields, PhD, BCC**  
541 243 3675

To: [publiccomment@bentoncountyor.gov](mailto:publiccomment@bentoncountyor.gov)

**Subject: Oppose/Deny LU-24-027 -A Garbage-Truck Sized Hole in the Community Wildlife Protection Plan (CWPP)**

Dear Benton County Planning Commissioners,

My name is Carol McClelland Fields, and I live at 37326 Soap Creek Rd about four miles from Coffin Butte Landfill.

I strongly oppose Republic Services' Conditional Use Permit application LU-24-027 to expand the Coffin Butte landfill. I urge the Planning Commission to deny this application.

**Benton County cannot afford to make a decision to build a new landfill/landfill expansion without a full understanding the fire risks associated with landfills.**

**The applicant's fire mitigation plan concludes that "operations at Coffin Butte Landfill do not present a significant fire risk." This statement is completely ludicrous.**

I will demonstrate a serious gap in the County's assessment of Coffin Butte Landfill's fire risk, a disconnect between Benton County's official stance on fires in the county as well as how a large fire on Coffin Butte Landfill **seriously threatens the livability on adjacent properties** [Benton County Code 53.215 (1)], **seriously impacts the character of the area** [Benton County Code 53.215 (1)], **and imposes an undue burden on the county's and region's fire services, emergency management services, first responders, and residents.** [Benton County Code 53.215 (2)]

## **Benton County's Official Efforts to Protect the County from Fire**

*"BENTON COUNTY'S VISION FOR WILDFIRE MANAGEMENT AND ADAPTABILITY:*

*For the County's populace to be wildfire aware and prepared for fire emergencies and for all properties to be adapted to **local wildfire risk.**"* (page 57 of CWPP)

**The Benton County Community Wildfire Protection Plan (CWPP) for 2023 – 2028 provides a comprehensive approach** to managing wildfire threats in the County's forestlands and in the **WUI (Wildland-Urban Interface: the geographic area where structures and other human developments meet or intermingle with vegetative fuels or border up against wildland fuels.)** (page 12 of CWPP)

**Twenty-three (23) fire, county, state, federal agencies and forestry organizations** participated in the CWPP planning process by appointing representatives to a Technical Advisory Committee. (Page 3 of CWPP)

**This CWPP was "agreed upon and endorsed by the Benton County Board of Commissioners, the Oregon Department of Forestry, and the Fire Defense Board in early 2023 ... to provide a framework for those local agencies associated with wildfire suppression and protection services to assess the risks and hazards associated with wildland urban interface areas and to identify strategies for reducing those risks."** The individuals who signed the current version of the CWPP include: Michael Curran (ODF West Oregon District, District Forester), Ben Janes (Corvallis Fire Department, Fire Chief), and Pat Malone (Benton County Board of County Commissioners), Vance Cronney (Benton County Counsel) (page 2)

*"State law says that in Oregon the Wildland-Urban Interface (WUI) boundary is defined by areas within an Urban Growth Boundary, or any area with a building density of at least one building per 40 acres...The focus is placed on those areas with sufficient building density and sufficient fuels to facilitate a WUI conflagration."* (page 12, 14) In addition to the forest and vegetation areas, **built fuels (structures or infrastructure) must be considered.**

Communities in wildfire-prone areas, including Benton County, are creating **Fire Adapted Communities** which incorporate people, buildings, **businesses, infrastructure**, cultural resources, and natural areas into the effort to prepare for the effects of wildland fire by:

- Acknowledging and **understanding the County's wildfire risk.**
  - Recognizing that regions of the County are **in or near a fire-prone ecosystem.**
  - **Having leaders** and citizens with the knowledge, skills, willingness and realistic expectations to properly prepare for and deal with wildland fire.
  - **Communicating clearly with citizens about wildfire risks** and specific methods for preparedness.
- (page 20)

**The local CWPP** is meant to guide actions to implement safety measures and fuel management to protect residents, homes, **businesses**, natural areas, and cultural resources against wildfires by:

- 1) **Bringing together multiple private and public stakeholders** across the landscape in partnership to reduce fire risk
  - 2) Identifying and prioritizing areas for **hazardous fuel reduction**
  - 3) **Reducing the ignitability** of the structures in the areas
- (page 15)

**However, There Is Large Gap in Benton County's Vision for Managing Wildfires: Benton County's CWPP DOES NOT MENTION COFFIN BUTTE LANDFILL!**

I searched the current CWPP document for the following words and phrases:

- **Coffin Butte** - a couple of mentions of Coffin Butte Road as ingress and egress for Northern County. **NO mention** of the Coffin Butte Landfill.
- **Valley Landfill, Inc** - **NO mention** of this company name
- **Republic Services** - **ONE mention** under this heading: *1.1.1e Create additional disposal opportunities for yard debris using alternative methods to burning*
- **Methane** – Phrase **Not Found**
- **Lithium Batteries** – Phrase **Not Found**

**In the Northern Forest Area– Strategic Planning Area #3** (Page 48-50). (“North central portion of Benton County from Kings Valley to Soap Creek and includes the communities of Kings Valley, Hoskins, and Wren.” Although not mentioned in the written description, this region extends to Hwy 99, including the Coffin Butte landfill.)

The CWPP mentions the high voltage powerlines that cross into this region (page 50), **but somehow misses the fact that there's a methane-belching landfill in the northernmost corner of the Northern Forest Area that has a documented pattern of landfill equipment and working faces catching fire on a regular basis.**

An important element in understanding “*the danger of wildfire is **the availability of diverse fuels in the landscape, such as natural vegetation, structures, and combustible materials.***” The bolded phrase is used three times in the document, **but landfill-related combustible materials (methane, lithium batteries, or other flammable, toxic substances) are never mentioned.** (page 25)

“*Prevention activities primarily focus on **altering the characteristics of fuel to mitigate the risk of catastrophic fires.***” (page 25) **But if the combustible nature of the Coffin Butte Landfill aren’t included in the CWPP or aren’t in the minds of County Leaders and Officials, then it's impossible to focus on “altering the characteristics of fuels to mitigate the risk of catastrophic fires”!**

## **Why are Republic Services and the Coffin Butte Landfill Missing from the CWPP? Did Anyone Even Notice?**

**I am not the first to notice this gap in the CWPP.** In discussing this topic with a neighbor, I learned that **the Coffin Butte Landfill was INTENTIONALLY LEFT OUT of the CWPP.** *Read the email chain exchange (appended below\*) that transpired in March 2022 when my neighbor sent an inquiry to the County staff person who was developing the CWPP. (Note that this same staff*

*person was also the County's Planning Official for the previous Republic Services CUP application in 2021.)*

**Why didn't any of the 23 organizations and four signers of the 2023 - 2028 CWPP notice that Coffin Butte Landfill managed by Republic Services was NOT included in the CWPP?**

## **Coffin Butte Landfill Itself Is a HUGE Flammable Target for Airborne Embers and Source of Airborne Embers**

There are several frightening fire scenarios to consider:

- 1. Consider a fire** (which may be due to spontaneous combustion, unstable lithium batteries, landfill vehicles or equipment, recently arrived hot loads, firecrackers set off to deter seagulls) **that originates on the Coffin Butte landfill and sets off a methane-fueled explosion.** From there, the embers fly up to five miles into OSU McDonald-Dunn forests, Starker forests, rural neighborhoods, urban areas, and agricultural lands. And then embers from those new fires fly another five miles downwind...and so on.
- 2. Consider a hot, high wind event with fire in a nearby forested or agricultural area that generates embers that ignite the industrial-sized methane plumes** that have been documented to exist over the landfill. From there, the embers fly up to five miles into OSU McDonald-Dunn forests, Starker forests, rural neighborhoods, urban areas, and agricultural lands. And then embers from those new fires fly another five miles downwind...and so on.
- 3. Consider a series of lightning strikes hit Coffin Butte landfill during an intense summer storm.** Whether they ignite lithium batteries which are inherently unstable, spark the methane plumes, or burn underground materials, a fire starts. From there, the embers fly up to five miles into OSU McDonald-Dunn forests, Starker forests, rural neighborhoods, urban areas, and agricultural lands. And then embers from those new fires fly another five miles downwind...and so on.

The origin of the fire or the method that provides the spark that starts the fire aren't the main issues here.

**The flammable, explosive nature of landfill methane and the toxic nature of the fires creates a very dangerous scenario that would irrevocably change the nature of our community and**

the surrounding areas for years and decades to come. As a result, **the livability of this region would be detrimentally impacted for years and decades to come.**

**A sizeable fire at the landfill would put undue burden on fire and emergency management services.** Due to the landfill's steep terrain, toxic air generated by a fire, the risk of methane or lithium battery explosions, radioactive waste, and a myriad of other inherent risks, **firefighters could NOT and would not put their resources toward fighting the landfill fire itself, they would have to focus on the endless fires that would start from the embers generated by the landfill fire or from the nearby forested areas adjacent to the landfill itself.**

**The undue burden would also fall on residents who live in the immediate area of the fire or find themselves under a blanket of toxic smoke that is known to have significant health risks. In the aftermath of such a fire, properties and homes would not be inhabitable, which would have a serious impact on the lives of many.**

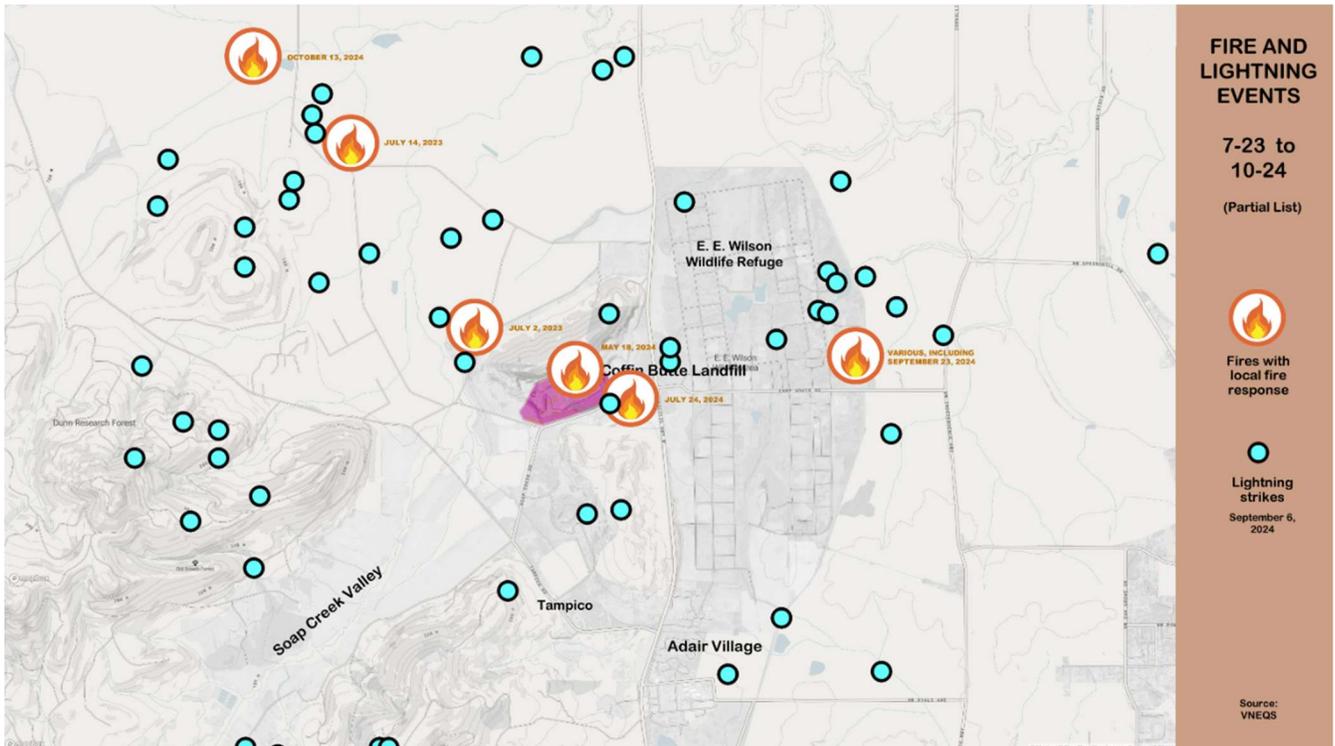
### **We can't just "assume" that a fire will never happen at Coffin Butte Landfill.**

According to FEMA, there are an average of **8,300 landfill fires each year nationwide.** This number is likely underreported because landfill fires on private land may not be included.

In 2022 alone *"there were **390 unique fire incidents reported at waste and recycling facilities in the U.S. and Canada, and based on reasonable assumptions, we can extrapolate that 2,400-plus facility fires occurred in 2022.**"* (Waste 360 article dated January 9, 2023)

And don't forget, *the Bridgeton Landfill <owned and operated by Republic Services> has been experiencing a "**subsurface smoldering event**" — a chemical reaction that heats and consumes waste like a fire but lacks oxygen — **for more than 14 years, emitting noxious odors.**"* Missouri Independent, Allison Kite, January 22, 2025

The map on the next page is a compilation of **fire events for the region surrounding Coffin Butte Landfill** from July 2023 – October 2024 and lightning strikes from one storm on September 6, 2024.



The risk and threat of fire cannot be minimized or dismissed. **Any operations plan for Coffin Butte Landfill put forth by the applicant can't erase the enhanced fire risk in our region.**

**How can County Leaders, County Officials, and Planning Commission – in good conscience – make decisions about the future of the new landfill / landfill expansion without fully understanding the fire risks and their impact on Benton County?**

This landfill business isn't another blueberry farm or winery; it's a waste disposal business that builds infrastructure, accepts processes toxic materials from various counties throughout Oregon and beyond, and generates two toxic commodities (methane & leachate) in high quantities into the foreseeable.

**Coffin Butte Landfill definitely contributes to the fire risk we face in Benton County, we just buried the lede and minimized the proof by leaving the landfill out of the CWPP, which is one of the main planning document for fire management in Benton County!**

**I firmly oppose LU-24-027.**

**We can't make a decision to build a new landfill/landfill expansion without first understanding the fire risks** *(along with all the other risks other residents have mentioned: health, air quality, water quality) associated with the landfill.*

**Let's return to the description of some of the goals of Fire-Adapted Communities that Benton County has commit to:**

- Acknowledge and **understand its wildfire risk.**  
*Currently the county and community have not acknowledged nor understood the fire risk associated with the Coffin Butte Landfill.*
- Recognize that it is **in or near a fire-prone ecosystem.**  
*Currently we, as a county, do NOT recognize the risks of fire events at the landfill, whether they originate at the landfill or they are sparked by other fires in the region.*
- **Have leaders** and citizens with **the knowledge, skills, willingness and realistic expectations** to properly prepare for and deal with wildland fire.  
*The fact that leaders and officials of this community signed off on the CWPP without a single mention of the landfill runs counter to the county's vision. An unforgivably large oversight.*
- **Communicates clearly with citizens about wildfire risks** and specific methods for preparedness.  
*Benton County has NOT communicated the wildfire risks of the landfill because they have NEVER looked at the issue, or they are too afraid to voice facts that run counter Republic Services' dreams of expanding the landfill.*

**\* Email Exchange that demonstrates why the Coffin Butte Landfill Was Left Out of the CWPP.**

*Read the email chain exchange that transpired in March 2022 when my neighbor sent an inquiry to the County staff person who was developing the CWPP. (Note that this same staff person was also the County Planning Official for the previous Republic Services CUP application in 2021.)*

Subject: Community Wildfire Protection Plan

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From: N Whitcombe - Sent: Friday, March 18, 2022 2:01 PM

Hi Inga,

I do not see anything in the Community Wildfire Protection Plan that addresses exit routes from

vulnerable neighborhoods (for example, Coffin Butte Road). Am I missing that? It seems to have been an issue that has mobilized several at-risk neighborhoods lately (for example, Oak Creek and Soap Creek of course).

**I also did not see the issue of the landfill addressed.** Since the landfill is itself an enormous fire risk (because of the methane it generates and its history of catching on fire), I am wondering if that should be addressed in this plan. Many of us in the neighborhood have wondered if the higher temperatures that we have been experiencing lately will have an impact on the flammability of the methane in the landfill. I have not been able to find any research that addresses this issue.

Whom should I speak with about these issues?

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On Fri, Mar 18, 2022 at 3:22 PM WILLIAMS Inga wrote:

Nancy,

Please review the Scope document that I have attached <not available>. This is what was given to the Board of County Commissioners at the beginning of this project. Disregard the Draft stamp, this is what was approved. Review of evacuation routes will be done after the CWPP has been approved, and then folded into it during an update.

I am not sure who you can talk to about the **increase in flammability of the landfill, sorry. It isn't a topic I will add to the CWPP.**

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From: N Whitcombe - Sent: Friday, March 18, 2022 3:28 PM

Who at the County is working on this *[the risk associated with the landfill]*?

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On Fri, Mar 18, 2022 at 3:39 PM WILLIAMS Inga wrote:

**No one is working on the landfill topic at the moment.** It may be addressed through a community process in the broader context of waste management options. But I do not know when that process will begin exactly – maybe a month or two?

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From: N Whitcombe - Sent: Friday, March 18, 2022 4:22 PM

I would like to bring the issue of the flammability of the existing landfill to the attention of whoever is working on the wildfire protection plan. It seems that **when you have a vast reservoir of flammable methane as a known fire risk, and which has repeatedly caught on fire, that should be taken into account in the formulation of a plan to reduce wildfires.**

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From: WILLIAMS Inga – Sent Fri, Mar 18, 2022 at 4:31 PM

Nancy,

I am working on the CWPP. **I don't see how I can include this in CWPP as I have no experience in the topic, and it would be a task too large to undertake for what is in the final draft stages.** It may be that it could be included as a task to be worked on in future year updates.

Inga

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**Please reject LU-24-027. Thank you for your consideration and for protecting the health and future of Benton County.**

Sincerely,

Carol McClelland Fields

Corvallis, OR 97330