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**Subject:** OPPOSE LU-24-027  
**Date:** Tuesday, May 6, 2025 4:10:07 PM  
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Testimony

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# LU-24-027 Testimony

For the record

Kevin Kenaga

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Good evening Chair Fowler and members of the planning commission.

Thank you for your volunteer service on this Planning Commission

I oppose LU-24-027 and any expansion of the Coffin Butte Landfill due to the increasing changes to the character of the area and the increasing undue burden placed on Benton County and Planet Earth largely because of Republic Services mismanagement.

Deck 1 images show the 7 days that satellite data are available for the last five years, Republic Services was out of compliance on 6 of the 7 days for an 86% noncompliance rate.

By exceeding the agreed upon exposed area Republic Services can take in more trash because they have a larger working area for the tippers and trucks to dump trash. Basically a corporation putting profits over people and Planet Earth. The larger exposed area releases more methane into our environment along with odors and toxins.

Please move to deck two

Deck 2 photo 1) shows birds scavenging on landfill, photo 2) shows tarps as an alternative daily cover on only 1/2 the working face, photo 3) shows alternative daily cover completely lacking on the working face 4) shows newly installed enclosed flare. Methane oxidation in landfills is a natural process where methane gas, a byproduct of decomposition, is converted into carbon dioxide and water by bacteria within the landfill cover soil. That is if soil is used as a daily cover. Federal rules require 6" of soil as daily cover but Oregon DEQ has issued Republic Services an alternative daily cover permit which is why we see tarps in the photos. Tarps do not have the same effect as 6" of daily soil yet DEQ issued this permit. Alternative daily cover doesn't trigger methane oxidation therefore Republic Services operating under this permit is putting an additional undue burden on Benton County and Planet Earth.

Our concerns also extend to the use of Covanta/Reworld incinerator ash that had previously been used as Alternative Daily cover. The 2024 publication in the journal, Environmental Monitoring and Assessment, was submitted in written testimony. It documents signature heavy metal contaminants found in the moss around the

Covanta/Reworld incinerator. The researchers are working towards publication of the companion study focused on Coffin Butte Landfill sometime this year.

You have heard that there has never ever been any enforcement of prior conditions of approval at Coffin Butte Landfill, you also heard Petra Schuetz state that Benton County has no staff to enforce conditions of approval . So any conditions of approval just as in the past would mean nothing. The situation with Oregon DEQ is very similar. DEQ does one annual inspection at Coffin Butte Landfill. DEQ makes an appointment to visit the Landfill. Republic Services gets the dump all cleaned up for the inspection. These visits are like realtor open houses.

Having called DEQ several times over the years I have never been able to get them to make an unannounced site visit. On one occasion I sent numerous photos covering a period of several months showing that daily cover and/or alternative daily cover was minimal or nonexistent. DEQ then received one photo from Republic Services showing that daily cover had been applied on one yes just one day. DEQ then considered the case closed without any penalty imposed. So much for any DEQ enforcement. Republic Services could quickly double the life expectancy of the existing landfill space by simply returning to pre 2017 annual tonnage. But no this corporation is putting money over people and our planet earth. If Republic Services did reduce the annual tonnage they would lessen the change to the character of the area and also would be reducing the existing undue burden on Benton County. Having one blighted slope has already changed the character of the area. And now with this expansion request Republic Services is asking to blight yet another slope which would further degrade the character of the Soap Creek Valley area while continuing to place an undue burden on Benton County. This is an unacceptable request.

Prior to Republic Services ownership of the Coffin Butte Landfill an expansion application was proposed in the 1980s and was shot down by Benton County residents. An expansion application submitted in the 1990s was denied. Then under the ownership of Republic Services an application was submitted in 2021 and in 2022 that application was unanimously denied by the Benton County planning commission. These landfill expansion applications have become a generational issue and we need to make sure future generations don't have to go through this undue burden.

This application and the 2021 application have put an undue burden on Benton County, Benton County staff, (there appears to be a complete turnover in the Planning Department largely due to the 2021 application) and the residents of Benton County. County Council Vance Croney being absent or possibly removed from participation in this application process raises questions and concerns about his involvement in the past expansion application processes.

Lastly with all the health concerns associated with landfills. it is very disturbing that our Benton County health department has been allowed to decline from making any testimony. How can this be, when landfills are known to create an undue burden on our environment and our health.

I ask you our planning commission to deny this application and also do whatever is possible to ensure that this is the last expansion application Benton County ever has to consider.

I thank you for the time to give oral testimony.