

From: [Carol McClelland Fields](#)
To: [Benton Public Comment](#)
Subject: Oppose/Deny LU-24-027
Date: Tuesday, May 6, 2025 4:01:57 PM
Attachments: [Testimony - Carol McClelland Fields - Hazardous Disaster Debris.docx](#)

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Written testimony.

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 -

Dear Benton County Planning Commissioners,

My name is Carol McClelland Fields, and I live at 37326 Soap Creek Rd, Corvallis.

I am writing because 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.

- The proposed use **does seriously interfere with** uses on adjacent property, with the character of the area, or with the purpose of the zone [Benton County Code 53.215 (1)]
- The proposed use **does impose an undue burden on** any public improvements, facilities, utilities or services available to the area [Benton County Code 53.215 (2)]

I want to draw your attention to a recent segment that was broadcast on 60 Minutes (CBS) on March 31, 2025: **California wildfires left behind 9 billion pounds of toxic ash and debris.** <https://www.youtube.com/watch?v=iYFksPCL-l8>

You are likely aware of the devastating wildfires that ravaged neighborhoods and cities in Los Angeles, California in January 2025. Watching this short 15-minute segment raised my awareness of what happens after wildfires:

**Debris Removal Phase 1 – Removing hazardous waste, electric car batteries, power wall chargers, or any other battery.** Even after a fire, lithium batteries can explode or reignite because they are unstable. It takes six people up to two hours to remove six drums of cells from each battery, then the cells go into a saltwater bath for three days, and finally they are steamrolled to make sure they can no longer function. This material can't be recycled, it **must go to hazardous material landfills.**

**Debris Removal Phase 2 – Removing the rest of the debris – in this case, 9 Billion (yes, that's a B) pounds of toxic ash and debris from the 2025 LA Fires –** and depositing the debris in 17 landfills and recycling center in various **dry-climate landfills** throughout the southwest. In addition, they **scraped 6 inches of contaminated soil throughout the region.** (The current "rule" is that anything deeper than 6 inches is said to be due to prior contamination.)

**Devastating Limbo for Homes that Didn't Burn** – 10,000 homes didn't burn to the ground during the LA Wildfires, which might sound like cause for celebration until you learn that these **homes are filled with soot, ash, and toxins, asbestos, exploded batteries, insulation, lead levels, arsenic, and debris.** **The indoor air quality within these homes is incredibly toxic.** There is a film of toxic dust throughout every home and smell the toxicity. Can these homes be cleaned to the point of being livable? Or are they total losses. Unfortunately, this is new territory and because they haven't suffered a "physical loss," the clean-up and their losses may not be covered by insurance.

**This information concerns me for two reasons.**

1. **If a large fire originates on Coffin Butte Landfill + Expansion or is sparked by flying embers from a nearby fire, the toxic nature of a burning landfill (smoke, ash, soot, particulate matter, gases, and chemicals), would negatively impact the entire region – where the fire burned and downwind of the fire.**

**In the aftermath of a large wildfire, even if your home survives the fire, the ash, chemicals, and soot** penetrate the buildings through cracks around windows and doors, **making your home unlivable.** *Furthermore, it is toxic and dangerous to continue to live in the region.* Ensuing health challenges range from: headaches, dizziness, and cognitive trouble to reproductive, kidney, respiratory problems, cardiovascular problems, and cancer.

A 2023 study by researchers at the **Environmental Protection Agency (EPA)** found that emission factors for some toxic compounds were more than 1,000 times **higher in urban wildfires than in fires that burned in woodland areas.**

<https://academic.oup.com/pnasnexus/article/2/6/pgad186/7202258>

***Excerpt from Abstract***

*Fires that occur in the wildland urban interface (WUI) often burn structures, vehicles, and their contents in addition to biomass in the natural landscape. Because these fires burn near population centers, **their emissions may have a sizeable impact on public health**, necessitating a better understanding of criteria and hazardous air pollutants emitted from these fires and how they differ from wildland fires.*

***Excerpt from Significance Statement***

***Wildfires in the wildland urban interface (WUI) burn homes and vehicles leading to potentially greater emissions of hazardous air pollutants than from wildfires***

**burning only natural vegetation.** *The greater proximity of these wildfires to population centers and the potentially more toxic emissions **make fires in the WUI a unique threat to public health**...Our results demonstrate that WUI fires are a potential major source of hazardous air pollutants and a better understanding of what and how much is emitted from them is needed.*

**Now imagine how toxins generated from a Coffin Butte Landfill-based fire would contribute to the impact of a local WUI fire.**

*Burning trash can cause long-term health problems. The **toxic chemicals** released during burning include nitrogen oxides, sulfur dioxide, volatile organic chemicals (VOCs) and polycyclic organic matter (POMs). Burning plastic and treated wood also releases **heavy metals** and toxic chemicals, such as dioxin.*

*Other chemicals released while **burning plastic** include benzo(a)pyrene (BAP) and polyaromatic hydrocarbons (PAHs), which have both been shown to cause cancer. If agricultural bags or containers are contaminated with pesticides or other harmful substances, those will also be released into the air.* (<https://dnr.wisconsin.gov/topic/OpenBurning/Impacts.html>)

**Increasing the size of the landfill with an expansion would contribute additional toxins to any local WUI fire.**

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- The proposed use **does seriously interfere with** uses on adjacent property, with the character of the area, or with the purpose of the zone [Benton County Code 53.215 (1)] – *A Toxic fire definitely interferes with use of adjacent property and beyond – nearby homes, Benton County, surrounding counties; the entire character of the area would be irrevocably changed; and Rural Residential properties and Urban would no longer be livable.*
  - The proposed use **does impose an undue burden on** any public improvements, facilities, utilities or services available to the area [Benton County Code 53.215 (2)] – *Undue burden would especially impact fire & emergency services, health services, mental health services, Republic Service employees, utility employees, and residents who pay county taxes.*
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**The Bottom Line: Expanding the landfill in such close proximity with residential neighborhoods, agricultural lands, and forested areas, creates greater fire risk and more likelihood that WUI fires would be catastrophic in nature.**

- 2. Given wildfire debris from structures is so hazardous** – asbestos, insulation, plastics, exploded batteries, appliances, coolant fluid, polyester curtains, cleaning products, lead, arsenic, mercury, cadmium, chromium and a variety of other dangerous PFAS chemicals – *Why on Earth is hazardous/disaster debris coming to Coffin Butte Landfill?*

Corporate Republic Services Site lists several services under **Disaster Response:**

(<https://www.republicservices.com/environmental-solutions/emergency-response-services/disaster-response>)

#### **Disaster Debris Removal and Waste Disposal**

- *Flood water management and mobile treatment*
- *Construction and demolition (C&D) waste*
- *Asbestos containing material and PCBs*
- *Compressed gas cylinders and other volatile hazards*
- *Biological material and biohazardous waste*
- *Hazardous waste disaster cleanup*
- *Hazardous and non-hazardous waste transportation and disposal*
- *Hazmat disaster cleanup*

#### **Wildfire Hazardous Waste Response**

*Significant quantities of hazardous material and debris create unique challenges for cleanup and recovery from the widespread destruction caused by a wildfire. Our dedicated crews have supported hazardous waste disaster cleanup efforts for dozens of wildfires, including countless major disasters over recent years. During each event, our crews worked closely with regulators to provide management, assessment and removal of Household Hazardous Waste (HHW), asbestos containing material, and other hazardous debris from **thousands of sites across the Pacific Northwest and other areas of the country.***

Republic Services' Environmental Services Map **does NOT list Coffin Butte Landfill as an Environmental Services Facility.** <https://www.republicservices.com/facilities/environmental-solutions>

In addition, I don't see any mention of these disaster services on the Coffin Butte Landfill's site.

**DEQ Fact Sheet: Protect Surface Waters While Cleaning Up Your Property**

(<https://www.oregon.gov/deq/wildfires/Documents/wfSWHomeownersFS.pdf>)

*After a Wildfire: **Ash and debris generated from wildfires can be harmful to our rivers and streams.** When rainwater carries sediment and debris from burned areas it also transports pollutants to our surface waters. **Many of these pollutants can be toxic to humans and aquatic life.** Water seeping through hazardous disaster debris would amplify these effects.*

Under their Corporate PFAS Solutions Services, Republic Services describes their Long-Term Secure Disposal Options are RS' landfills in Grand View, Idaho, and Beatty, Nevada, that have special design and construction **“with the added natural protection of being in arid locations with very little rain and low humidity.”**

<https://www.republicservices.com/environmental-solutions/treatment-disposal/pfas-solutions>

**The pollutants from disaster debris are toxic to humans and water species.**

**The best place to put disaster debris is in an arid location.** We all know this area is not an arid location with very little rain and low humidity. **Coffin Butte Landfill + Expansion has the exact opposite description – high levels of rain and humidity.**

**Why on Earth is the Coffin Butte location / expansion taking in hazardous waste?**

**Given our wet climate, adding more dangerous disaster debris into the Coffin Butte Landfill + Expansion will generate even MORE toxic leachate** than the current landfill already does. This toxic commodity needs to be disposed of even though no local water treatment plant has the ability to remove PFAS from the leachate to create non-harmful water.

Instead, the diluted leachate gets released into the Willamette River upstream from cities that receive their drinking water from the Willamette River.

**Given that the detrimental impacts of PFAS chemicals are cumulative,** this means human bodies, wildlife, and the environment will have **increasing levels of PFAS in their systems.**

Republic Services may be “getting rid” of a noxious problem, but **at what cost to the people, wildlife, and ecosystems downstream?**

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- The proposed use **does seriously interfere with** uses on adjacent property, with the character of the area, or with the purpose of the zone [Benton County Code 53.215 (1)] – *Additional leachate that is even more toxic than the “regular landfill leachate” impact adjacent properties and beyond – local wells, water intakes along the Willamette River; if our waterways become polluted due to the extra toxic leachate and the regular toxic leachate, the character of our area and the state of Oregon would be compromised. Imagine the public relations nightmare*

*if people along the Willamette River have health impacts from leachate chemicals in their drinking water. **What kind of reputation will Corvallis and Benton County have then?***

- The proposed use **does impose an undue burden on** any public improvements, facilities, utilities or services available to the area [Benton County Code 53.215 (2)] – *Extra toxic leachate from disaster debris + additional leachate from the expansion would impose an undue burden on health services, agriculture, and residents throughout the Willamette Valley.*
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**The Bottom Line: Disaster Debris does not belong in a landfill in a wet climate. Republic Services built state of the art landfills in dry climates for this very reason!**

**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