

From: [Kevin Kenaga](#)
To: [Benton Public Comment](#)
Subject: OPPOSE LU-24-027
Date: Thursday, May 8, 2025 3:59:13 PM
Attachments: [LU-24-027 Kevin Kenaga May 8 oral.docx](#)

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Public Comments May 8th, 2025

LU-24-027 Testimony - May 8th

**Kevin Kenaga
37461 Soap Creek Rd.
North Benton County
Corvallis, Oregon 97330**

**Good evening Chair Fowler and members of the planning commission.
Thank you for your volunteer service.**

I oppose LU-24-027 under BCC 53.205 and 53.215 due to the increasing changes to the character of the area and the increasing undue burden placed on Benton County and Planet Earth largely due to Republic Services mismanagement.

I planned to give you handouts but I was told that I could not.

Deck 1 images show the landfills exposed area for the 7 days that satellite data are available for the last five years, so of 7 images, Republic Services was out of compliance on 6 of the 7 days available 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. This larger exposed area releases more methane, odors and toxins into our environment.

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 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 trigger methane oxidation yet DEQ issued this permit. By operating under this permit Republic Services is putting an additional undue burden on Benton County and Planet Earth.

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photo 1) shows birds scavenging on the landfills exposed area, birds that later go off and do crop damage which is documented in others testimony. Please consider this photo when reading the Mid Valley Bird Alliance testimony and in considering Republic Services Wildlife consultant's report.

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photo 3) shows alternative daily cover completely lacking on the exposed area

photo 4) shows the newly installed enclosed flare billowing smoke.

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 the publication of the companion study focused on Coffin Butte Landfill expected out sometime this year.

Benton County Talks Trash found 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 does not have the 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 inspections 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.

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photo 1) Rohner family on their farm on the south slope of Coffin Butte pre 1945.

photo 2) Coffin Butte distant view circa 1900

photo 3) Coffin Butte annual tonnage in millions of tons

Republic Services could quickly double the life expectancy of the existing landfill, yes double, by simply returning to pre 2017 annual tonnage. But no this corporation is putting profits over people and Planet Earth. If Republic Services did reduce the annual tonnage they would lessen the change to the character of the area and would also 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 application 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 and Planet Earth. 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 that 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, (where there appears to be a complete turnover in the Planning Department largely due to the 2021 application) and also on the residents of Benton County.

Comparing Republic Services expansion application to a landlord tenant agreement or maybe more likely for all of us ,to the experience of an overnight houseguest, one that you wouldn't invite back.

How did we get here?

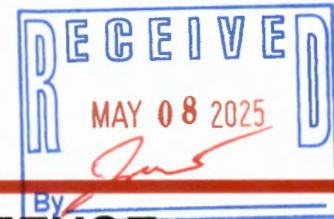
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Lastly with all the health concerns associated with landfills. it is very disturbing that our Benton County health department has been allowed to decline from making any testimony. How can this be when landfills are known to create an undue burden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

Republic Services has not been a good tenant nor have they been a good neighbor, yet here they are asking "to stay for 6 more years".

I ask you our planning commission to deny this expansion application.

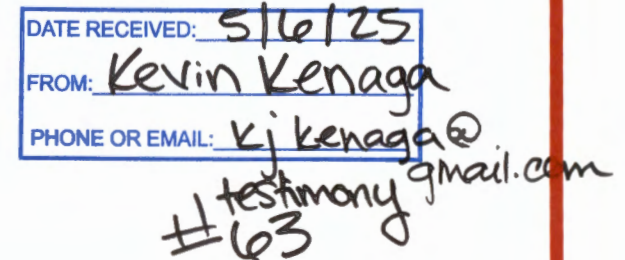
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VLI DAILY WORK AREA OF EXPOSED REFUSE

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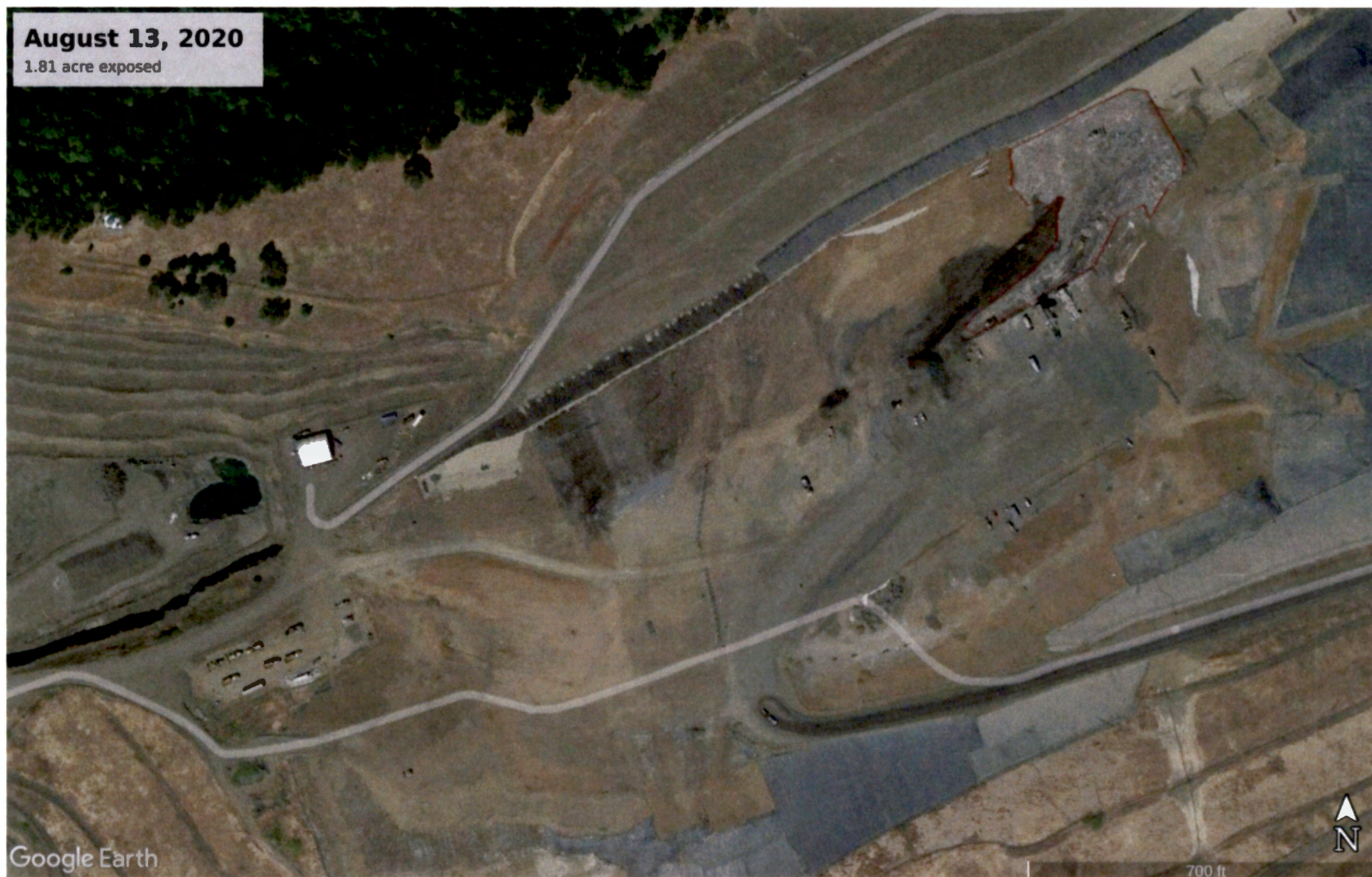
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Compliance area based on from BCTT p. 792:

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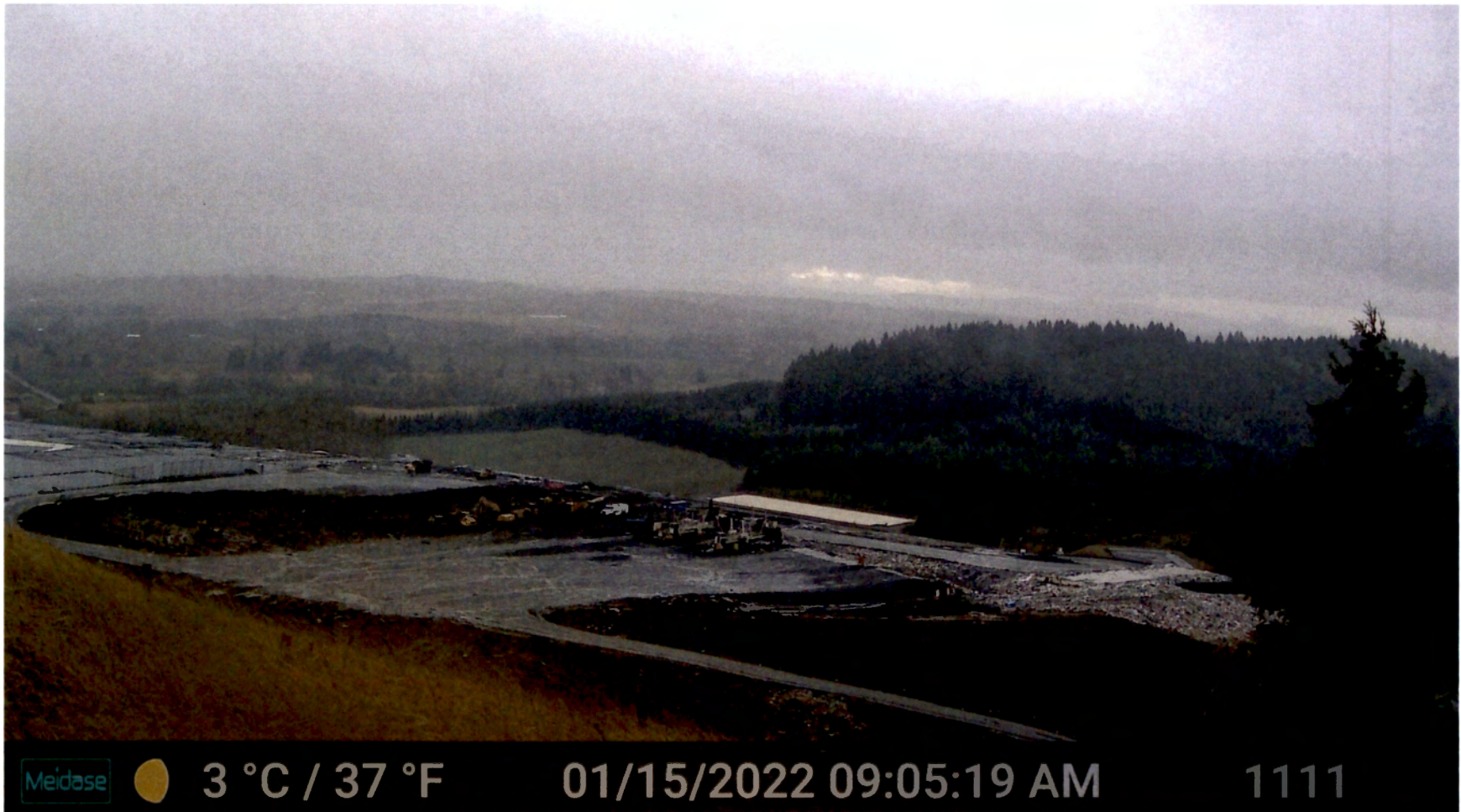
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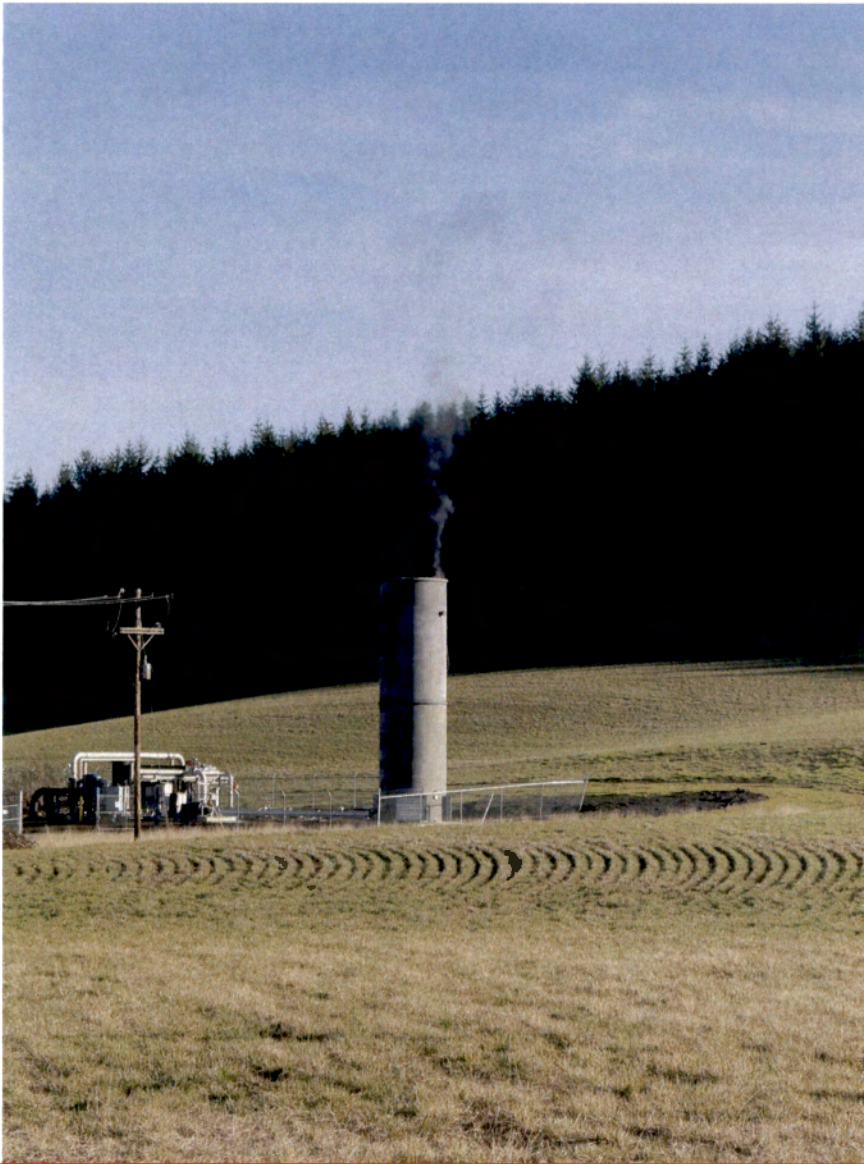
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Butte Landfill power generation facility**

Testimony

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PHONE OR EMAIL:	kjkenaga@gmail.com

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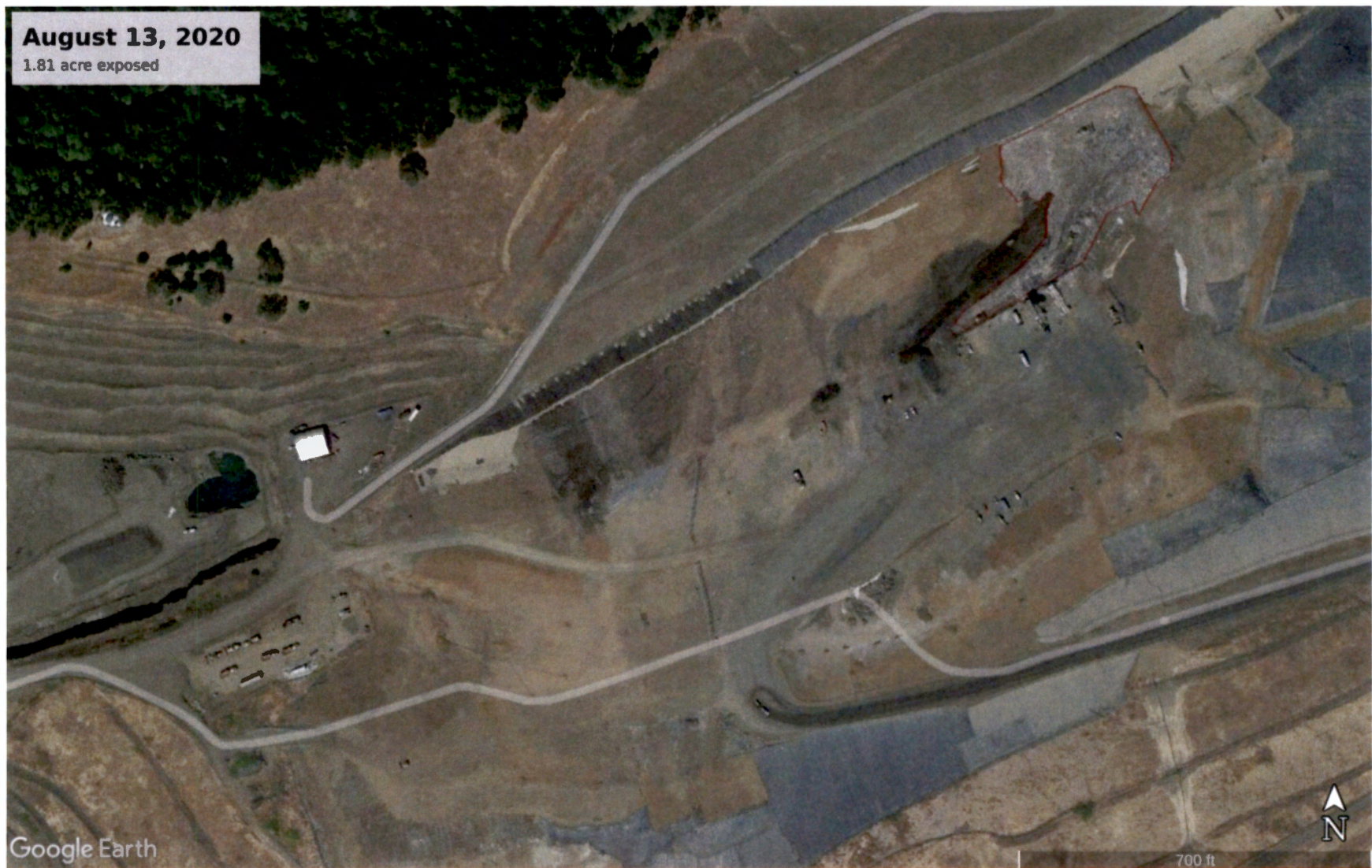
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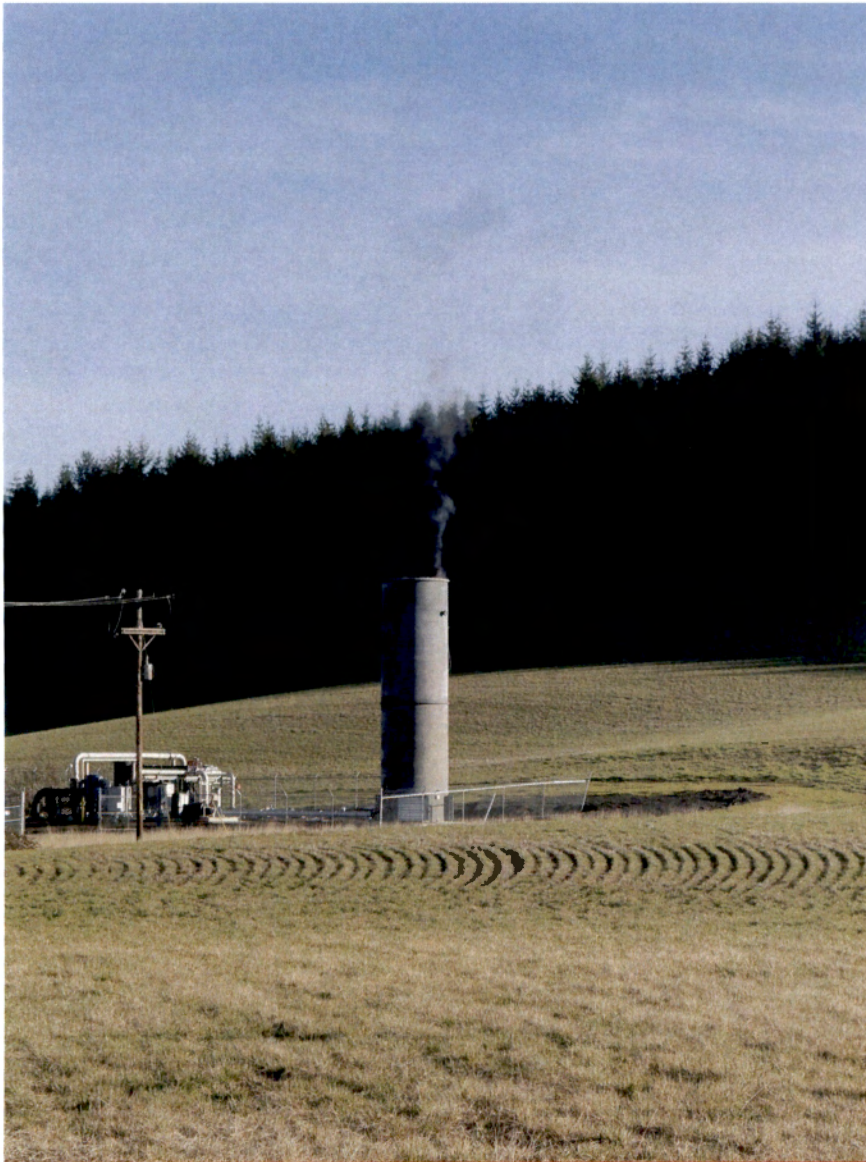
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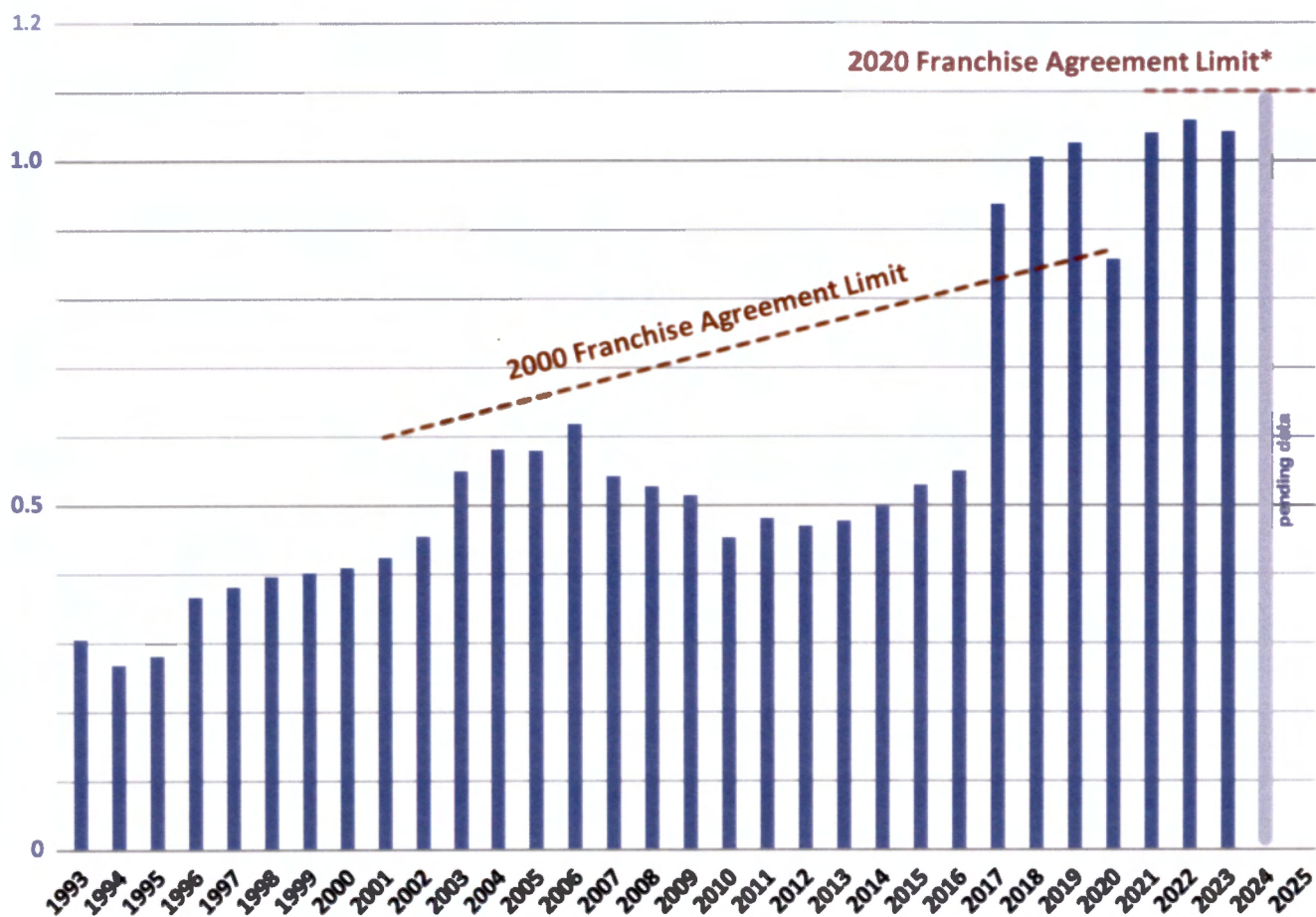


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COFFIN BUTTE LANDFILL ANNUAL INTAKE VOLUMES IN MILLIONS OF TONS

* limit is waived if landfill is expanded