

July 8, 2025

Good evening Chairman Fowler, Planning Commissioners and staff,

I'm Camille Hall and I live at 7175 NW Mountain View Drive, Corvallis.

I oppose LU-24-027, expansion of Coffin Butte Landfill.

Thank you for the long hours and effort you have put into this review.

This land use hearing is the only place where residents have standing in decisions made about the use of this property, through these requirements:

BCC 53.215 (1) "The proposed use does not seriously interfere with uses on adjacent property, with the character of the area, or with the purpose of the zone;

(2) The proposed use does not impose an undue burden on any public improvements, facilities, utilities, or services available to the area"

Much of the testimony in opposition to the expansion has been brought up before. What is new today is the decision by staff to accept the applicant responses to our concerns without effectively addressing those concerns. This is the only time Benton County has the chance to stand up for the rights of residents whose properties and lives are impacted by this expansion. Once the CUP is approved, not only will the tonnage cap be lifted, but Valley Landfill will be free to operate Coffin Butte Landfill within the letter of the law, which is insufficient to protect the land use rights specifically protected through the CUP approval process.

We as citizens, County administration, staff and volunteers are overmatched by the resources of this \$75-billion dollar corporation with 200+ active landfill sites nationwide and the ability to hire consultants on retainer to show up for them in situations like this. Coffin Butte Landfill is a very profitable operation for Republic Services. As a small county with a very large landfill, the CUP process is the only place the County, staff and Planning Commission have the power and authority to protect adjacent property owners with regard to their ability to live and work on their property.



Engineering models, such as those used here by Republic Services, are based on assumptions and use data that exist in historical record. Especially in regard to odor and noise, which are transmitted through interactions between the physical landfill site and atmospheric conditions, the continued presence of methane plumes, propelling landfill toxins and odors, along with equipment noise, hundreds of feet in the air. These serious problems call for site-specific air flow studies rather than historical models.

Likewise, the applicant's supplemental responses to our groundwater concerns state that a "focused hydrogeologic investigation of the proposed development" will occur AFTER the CUP as part of the site development permit. We need to look at data regarding the exact nature of the site now, prior to approval, in order to anticipate how the proposed development will affect adjacent properties. We need to know in site-specific terms, how the blasting and excavation might affect the groundwater and wells on those properties. The applicant's plan relies on test wells and mitigation in response to perceived damage. The expansion will have serious irreversible adverse impact on the use of adjacent property if groundwater is diverted, well levels drop or wells are contaminated.

Other examples of the use of inadequate data, or historical data and modeling in the applicant response include: the map on p. 56 showing groundwater at Coffin Butte Landfill flowing away from adjacent properties, but no information for the direction of groundwater flow on adjacent properties south of the proposed expansion; and the statement on p. 57 of the supplemental staff report re: effect of Development on Dewatering: "VLI's evaluation of the impacts to local water supply wells considers the relative consistency of the groundwater flow conditions to support a conservative assumption that fractured bedrock behaves similarly to a porous media. Under this assumption, all fractures are interconnected, allowing the analytical solution to evaluate the most widespread effect of the proposed project..." The applicant does not provide evidence to convince us of factual basis of this assumption.

We also request the Oregon Water Resources Department be notified of the application and issues raised by the community. As the state agency most knowledgeable and with the broadest authority over groundwater use in Oregon, they should be invited to comment and refer us to other agencies if appropriate.

With regard to onsite grass fire, larger scale wildfire, disaster/emergency response and emergency evacuation, we would like to see appropriate state and county agencies involved in reviewing and commenting on the application and concerns we have raised. The local volunteer department at Adair commented as to their limitations. This is an undue burden on local resources which might be needed to protect and defend the residents of Adair Village during the time they are responding to fires at Coffin Butte. We want to see how these agencies will be able to respond under the conditions of the expansion, in order to determine the burden on public services and how this will affect our safety and use of our property.

An overarching problem is the highly technical nature of this application, involving many specialized fields of study. Republic Services has called on the experts who have supported and defended their actions and applications nationwide. These consultants rely on generalized data and models to defend the application. The county does not have staff or consultants to match that expertise in all the areas necessary to evaluate the relevance of the applicant's response. County and state agency reports also specifically defer to the applicant on several topics where, in the course of their regular duties, they do not have the authority or expertise to comment. In these cases, we ask that the appropriate agencies and unbiased topic experts be called on to evaluate the applicant's work.

From 2010-2016, Coffin Butte took in 500-600,000 tons of trash a year. Beginning in 2017, annual tonnage doubled. We know the impacts of these tonnage and activity increases. This expansion is a turning point in the future of Benton County. A decision to approve this CUP enables VLI to pursue further landfill expansion here in the relatively damp, residential and

agricultural Willamette Valley. Republic Services owns Roosevelt landfill, just across the Oregon/Washington state line from Columbia Ridge landfill which is operated by Waste Management. Waste Management ships trash by rail to their facility and offers a model that could be pursued by Republic Services if they weren't free to continually expand here at Coffin Butte at much lower cost.

I urge you to deny this application to protect land use rights of adjacent properties, and to encourage Republic Services to develop more responsive and responsible waste management practices here at Coffin Butte, rather than committing Benton County to more of the same problems you have heard about in this hearing.

Thank you.