



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 is the decision by staff to accept the applicant's responses to our concerns without effectively addressing those concerns. CUP approval or denial is the only chance Benton County has to stand up for the rights of residents whose properties and lives would be so profoundly 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, with insufficient State & Federal regulatory support and lack of County resources to develop rules and expertise to effectively monitor this privately-owned landfill.

RS is a \$75-billion dollar corporation with 200+ active landfill sites nationwide. It is not focused on the needs of the community. That is our job, as a County. The CUP process is the only place the County has the power and authority to protect adjacent property owners with regard to their ability to live and work on their property.

The primary concern I will address here is groundwater protection for properties adjacent to the expansion site.

The applicant's supplemental response 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. The Planning Commission needs to look at this data 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. This approach meets the needs of the landfill operator, but completely fails to protect adjacent property owners from the serious and irreversible damage that will occur if groundwater is diverted, well levels drop or wells are contaminated. Republic Services and the County have a history of negotiating mitigation of water contamination from the landfill by capping off contaminated wells, offering supplemental water, and in the worst case, buying the damaged property.

The applicant provides only that historical data and modeling which support their interests. For example, the discussion and map on p. 56 of the supplemental staff report only deal with internal groundwater flow into the expansion site. They assert there will be no crossover of groundwater from the landfill onto adjacent properties as a result of blasting and fail to discuss the direction of groundwater flow from the top of Tampico Ridge and the blasting zone onto those adjacent properties. The same is true of groundwater flow across the highway.

Their response to our concerns, addressing the effect of Development on Dewatering, on p. 57 of the staff report states: "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 the factual basis for this assumption.

The overarching problem is the highly technical nature of this application, involving many specialized fields of study. Republic Services has the financial advantage of being able to call on consultants and experts who have supported and defended their landfill operations and applications nationwide. Staff, county and state agencies, on the other hand, are hampered by lack of funding and broader public responsibilities. In several places throughout the review, staff and agency comments specifically defer to the applicant on topics where, in the course of their regular duties, they do not have the authority or expertise to comment. We cannot let these issues slide. In these cases, we ask that the appropriate agencies and unbiased topic experts be called on to evaluate the applicant's work.

In the case of groundwater protection, we specifically request that the Oregon Water Resources Department be notified of the landfill expansion application and water quality issues raised by the community. As the state agency most knowledgeable and with the broadest authority over water resources and rights in Oregon, the County should request them to review and comment prior to final CUP deliberations by the Planning Commission.

From 2010-2016, Coffin Butte took in 500-600,000 tons of trash per year. Beginning in 2017, annual tonnage doubled. We know first-hand the impacts of these tonnage and activity increases. A decision to approve this CUP enables Republic Services/VLI to continue its trend to fill space quickly and come back for another landfill expansion. It also allows Republic Services to remove trash from cell 6 in order to resume blasting and removal of valuable basalt from the old quarry before it resumes dumping in cell 6. As you heard in May from Bill Briskey who owns property adjacent to cell 6, blasting that occurred to expedite opening of cell 6 caused the loss of his livestock pond and cracks in an outbuilding foundation. The applicant chose not to address the loss of the livestock pond and dismissed the foundation cracks as not blast-related.

I urge you to deny this application. The applicant has finally offered remedies to some of the most egregious operational problems that have plagued this site. There is more work to do. Denial of the CUP is the only avenue you have to protect the land use rights of Benton County residents and ensure that you get the best possible proposal from Republic Services.