



July 1, 2025

TO: Benton County Commissioners, Benton County Planning Commission

SUBJECT: Please support and approve Coffin Butte Landfill Expansion

FROM: Brent Pawlowski, 50+ year Corvallis resident. These opinions are my own and are completely separate from my involvement on the DSAC Committee.

Please support the Coffin Butte Landfill Expansion for the following reasons:

1. The owner-operator, Republic Services, has shown to be a responsible company both on operations and compliance.
 - Records show Republic Services has not had an environmental compliance violation.
 - The contentious methane "exceedances" are not violations. Republic Services has followed protocol for measuring and correcting exceedances per testing and correction protocol. This is well documented.
 - Republic Services has shown that they act quickly to information requests from both state and federal regulators and agencies. The Republic Services representatives continually affirm that they are willing to adopt new practices where they make sense.
 - Republic Services graciously participates in the solid waste advisory meetings and regularly participates in public hearings.
2. Republic Services is an example of an organized, well-run landfill manager.
 - Republic Services manages landfills across the nation and has developed modern best practices to minimize impact.
 - Everything we do in our daily life generates waste. A well-run landfill is an asset to deal with this waste.
 - Republic Services has a track record in landfill management. Across several states, Republic Services has bought many dump sites and modernized them into landfills with up-to-date liners, latest leachate treatment, and methane capture. Let us be thankful we have a responsible partner running Coffin Butte.
 - When landfill users are asked, a majority of the local users view the landfill as an asset. One just has to ask the users as well as simply look at the daily line of customers. These locals use this asset for needed waste disposal in their daily lives and business. Each day there is a long line of contractors / landscapers tipping waste each day.
 - Republic Services has improved ease of access for disposal. Locals using the landfill now are able to tip most small loads in a transfer area versus on the exposed face. This has improved time savings and safety.
 - Republic Services has a competent engineering team to design leachate and methane capture. Designs must follow design scrutiny for best practices. This and other landfill

sites already have oversight to protect the public. Capturing leachate and methane are an understood practice.

3. Benton County can show leadership in maintaining a waste management solution as Oregon seems to lack a vision of solid waste disposal.
 - Expanding the landfill makes sense until Oregon declares a long-term strategy for waste handling.
 - The closing of the Brooks incinerator, was short sighted which diverted waste to Coffin Butte. This is an inconvenient fact when counties attempt to push their waste “problem” to another county. Although “environmental” concerns are cited on any solid waste disposal, we (community, state, or nation) cannot “recycle” its way to zero waste.
 - When landfills are taken offline, it pushes the cost to the consumer. Let Benton County not fall into irrational activism. Simply phasing out or shutting down a landfill does not magically make trash or the concerns disappear; it only displaces the waste.
4. Alternate or disruptive alternatives takes years-to-decades to complete. An expansion is a good back-up plan until then.
 - Other than shipping waste out of state, there is no other option right now than to landfill waste in Oregon. Shutting down incinerators automatically put the burden on landfills.
 - If ever a new technology replaces landfills, an expansion makes sense until then.
 - Many alternative solutions may sound good on paper but implementation is not so easy. Many of these alternatives are cumbersome and expensive. Residential customers will not support expensive alternatives that provide little benefit.
5. Regionalized landfills are a fact of life.
 - Landfills are now regionalized because of regulation and barrier to entry.
 - Taking waste from other counties is an inconvenient fact of regulation and the barrier to entry of anyone who handles solid waste. Those who criticize this practice, simply ignore the effort and expense required for a business to simply haul waste and properly landfill it.
6. Republic Services follows regulation.
 - Benton County should trust the state and federal regulators for landfill safety and environmental impact. It should not be Benton County to add more regulation. If Republic Services is doing something unsafe, then our ire should be directed at the very agencies that were chartered oversee and protect us.
 - Who is to say we know more than the scientists and regulators who have written the rules? More rules based on emotion can shut down an operation, then the trickle-down cost effect ends up on the residents. Let Benton County rationally follow our nation’s regulatory agency rules for guidance.
 - There has been recent concern of PFAs or other “forever” chemicals that spawn from breakdown of synthetics and plastics. Although it is argued that these chemicals are ‘concentrated’ at a landfill operation, these compounds are in everything we touch.
 - PFAs are currently under research. Information on health affects are going through the scientific learning process.

- Let us trust our DEQ and EPA to take action when appropriate. How to regulate PFAs should be on the agencies chartered to do so.
- Why be in fear of what we do not know when average human lifespans are longer than they ever have been. Perhaps the invention of synthetics and plastics have benefited life more than we realize.

7. Landfills are commerce, like it or not.

- Benton County must make an informed decision on a major commerce industry in our economy.
- Tipping fees generate county revenue that more than offset the effort of county staff to oversee the operation.
- Pushing waste further away, increases costs and affects those most vulnerable to higher prices. This affects lower-income residents the most, which is not equitable.
- Waste has to be dealt with. Why cop out and push this off to other counties or states? This would be like "sweeping the solid waste issue under the rug" when the Coffin Butte site has run well for many years.
- The public does not understand what the loss of a local landfill would mean if the residents were to be told "drive your waste to the next town". Just think of a 50 to 100-mile round trip to dispose of waste.

8. Republic Services manages landfill across the nation and has developed modern best practices to minimize impact as well as look to the future.

- Republic Services has been good stewards of methane capture and are willing to modernize.
- Recently, Republic Services announced plans to convert from methane power generation to a new methane scrubbing that will then be injected into the existing natural gas pipeline. This would allow the methane resource to be used more efficiently without "flaring off" the excess as currently done.
- Republic Services has removed all of the legacy unlined cells of Coffin Butte. Little known among many and ignored by opponents, Republic Services completely excavated and moved the legacy dump site to the modernized portion of the site. This was the final step of mitigating leachate drainage into the porous (unlined) zones. Reportedly, the newspapers dug up from the 1940s were still readable. How can anyone be against a company willing to absorb costs to modernize and reduce risk of leachate escape?

9. Odors and smells are expected and will not increase with an expansion.

- Many opponents to the landfill are those that live near the landfill site.
- Perhaps the smell at Coffin Butte has actually been reduced. Republic Services was committed to community input and their actions show. Republic Services made operational changes to reduce the open face to only a few acres and to cover or tarp the face during nighttime hours to reduce smell.
- The criticism of living near the landfill should go back to those who bought discounted property near a landfill. Shift in wind direction can make a landfill a bad experience to nearby neighbors. This landfill has been there since the 1940s. Smell from an active landfill

is obvious to neighbors. Nearby residents who bought land after 1940 were either in denial or simply assumed the daily adversity.

- One should not expect customers of several counties to yield to the few who had the option to buy property elsewhere. The responsibility of having one's property value affected should be pushed back to those who decided to buy residential land nearby. What were they thinking?
- I toured the landfill over 35 years ago and it was communicated even back then that the long-term plan was to expand the landfill. This was no secret to the public or to any real estate buyer. Those who bought property near the landfill should not be surprised at the expansion proposal.

10. Opponents to the landfill have purposely passed out misinformation.

- During 2024 a mass mailing from a group labeled as "Beyond Toxics" claimed the leachate was being "dumped directly in the Willamette River" which was untrue. An example of the mass mailer (postcard) was given to county staff. The county decision makers should note this and declare this as misinformation.
- A website claimed to be "Coffin Butte Facts" has falsely stated that Republic Services is currently "violating environmental laws". This is also false. There is no pending enforcement action nor has Republic Services been informed of pending enforcement.
- As much as opponents may not like aspects of a landfill, it is unproductive to mislead the public with purposeful, premeditated, false claims. Testimony from this and sponsor groups (Center for Environmental Justice, Corvallis Environmental Center, VNEQS) should be treated as "not credible".