

From: [Virginia Scott](#)
To: [Benton Public Comment](#)
Subject: LU-24-027 - application to expand Coffin Butte Landfill - Fire New Evidence Rebuttal
Date: Wednesday, July 16, 2025 11:56:01 AM
Attachments: [Fire New Evidence Rebuttal.pdf](#)

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RE: LU-24-027, the application to expand Coffin Butte Landfill
RECOMMENDATION: Please deny this application

Dear Chair Fowler, Vice Chair Hamann, and Planning Commissioners Biscoe, Cash, Fulford, Lee, Struthers, and Wilson:

Attached please find my response to comments contained in Republic's and County's slide decks in the "9. New Evidence from July 8-9 Hearings" folder on Munidocs. Please remember you need to double-click on the Attachment in the header of this email in order to view my document."

Thank you for your diligent work and herculean effort to review and evaluate the records submitted for this land use consideration.

My attachment is respectfully submitted to respond to new evidence related to fire and fire risk.

Sincerely,

Virginia Scott
37016 Soap Creek Rd.
Corvallis, OR 97330

Virginia Scott • 37016 Soap Creek Rd • Corvallis, Oregon 97330

RE: LU-24-027, the application to expand Coffin Butte Landfill

RECOMMENDATION: Please deny this application

Dear Chair Fowler, Vice Chair Hamann, and Planning Commissioners Biscoe, Cash, Fulford, Lee, Struthers, and Wilson:

I'm submitting this letter in response to information in two items in the in the "9. New Evidence from July 8-9 Hearings" folder on Munidocs:

- 1) Republic's slide deck ("25RS1067 Coffin Butte Deck_FINAL")
- 2) County staff's slide deck ("Staff Slides to Planning Comm LU24027 July 8")

And for verification/support of statements I make below, I've provided links to items in Munidocs (as they relate to the above two items) so that you can quickly and easily refer to them, if needed. Please note that per the system County uses, any links in emails submitted to Munidocs are found in the "Attachments" section of the email's header, and must be double-clicked to open.)

Topic: FIRE

Below I will be referring to:

<> County staff's slide deck, pages 6, 7, 23, 25 and 28; and

<> Republic's slide deck, pages 17-19

In County staff's slide deck, page 6, under "Agency Comments", under "Responded" Adair Rural Fire Protection District is listed as having "responded" on April 21, 2025.

This listing would seem to suggest that the County had reached out to Adair Rural Fire Protection District to solicit input.

Per Kate Harris in 07092025_HARRIS_Kate Page 4

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287992bcb718 she confirmed that Adair Rural Fire Protection District was never contacted by the County about the CUP.

On April 21, 2025 Adair Rural Fire Protection District Chief Arron Harris did submit public written testimony urging rejection of the CUP 1819_04212025_HARRIS_Aaron

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696ca0debf7.

> *The County never reached out to Adair Rural Fire Protection District for input.*

In **Republic's slide deck, page 19**, Republic responds to the Comment that "*Coffin Butte does not record fires or keep incident logs of such events*" as follows:

- Coffin Butte Landfill pledges to maintain a log of fire incidents.
- Coffin Butte Landfill will provide a verbal report of fire events during Benton County Disposal Site Advisory Committee (DSAC) meetings.
- Coffin Butte Landfill will report each fire event to ODEQ.

> Coffin Butte was already required to report all fires to ODEQ as part of their Title V Air Quality Permit.

As documented in 070925_SCOTT_Virginia, page 3

(https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287982fdddfd)

> Despite the existing requirement to report all fires to ODEQ, Republic Services is not reporting them to ODEQ.

Also see 2008_07012025_SCOTT_Virginia01 attachment beginning on page 1 which documents the only 2 ODEQ fire reports since January 1, 2022 of the 13 known fires during that same period

(https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=826f5adc57ab5)

Republic Service "pledges" to maintain a log of fire incidents and report each fire event to ODEQ, and this is stated as a mitigating COA per [Staff slide deck](#) p. 23.

> "Logging and report fires" after they occur does not mitigate a property owner losing their home, business, or the use of their land.

> As to fire prevention: Reporting of fire events is a reactive measure, it is not pro-active. I did not see mention of measures being taken to monitor the landfill for eruption of fire, monitor "extinguished" fires after hours to make sure that they do not reignite, nor a mention of notifying local fire departments upon the onset of an eruption of fire, only reporting after the fact. We are now in the "fire danger" period of our year and a small fire eruption can quickly move to a major wildfire.

In **Republic's slide deck, page 18**, Republic states that "*Coffin Butte Landfill met with Adair Fire in March 2025, with each pledging a cooperative relationship going forward.*" and "*No concerns about fire department support were expressed during that meeting.*"

> The meeting in March 2025 was initiated by Dr. David Hackleman, an adjacent property owner, to discuss what afterhours fire monitoring Republic Services could implement. Dr. Hackleman was concerned that there is no plan for afterhours monitoring either of fires that had started during the

day that had been “treated”, but later flared after hours, or of new fires that ignited after closing, and the fact that Republic Services was relying on citizens passing by to report fires.

> Of particular note is that Dr. Hackleman hosts radio communications equipment on his property that among other things would be used for emergency communications between the Soap Creek Valley and the outside world if traditional communications were otherwise unavailable due to power outage, downed cell service, damaged landlines, etc. Fire damage to these communications resources is a significant undue burden. See page 4-5 of Dr. Hackleman’s testimony:

(https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166f5dd2f495)

> The meeting was not about "pledging cooperative relationships", or about the "fire department’s concerns about being able to provide support", which explains why that was not brought up at the meeting. The fact that it was not brought up in a completely unrelated discussion regarding after hours monitoring is not “proof” that there are no concerns.

Please see 07082025_HIGGINS_Nancy

(https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=82879815d004a) for a description of a few of the concerns and undue burdens on the volunteers of Adair Rural Fire Protections District.

In County staff's slide deck, page 28, under "Key Findings", it lists the following:

BCC 60.405 Siting Standards.

- Proper fire mitigation and minimize fire risks
- Least impact on forest operations and accepted farming practices
- Minimize use of forest lands

County then "Concur(s) with applicant and county engineers, no significant impact, impacts and uses are minimized" and claims "P2-4 (of Applicant's application) ensures consistency with FC zone fire break standards."

Here is what "P2-4" actually says:

Applicant shall maintain a **primary and secondary fuel-free fire-break surrounding each structure on land within the FC zone** that is owned or controlled by the owner, in accordance with the provisions in "Recommended Fire Siting Standards for Dwellings and Structures and Fire Safety Design Standards for Roads" dated March 1, 1991 and published by the Oregon Department of Forestry (ODF).

[illegible]

> Placing fire breaks around the structures in the new development, as illustrated in the plans above (outlined in red), will in no way protect or mitigate the risk to the community from a landfill fire in the existing or the new proposed landfill.

> The changing climate is increasing instances of wind events with fire (Lahaina, LA, Paradise, Oregon's Labor Day fires) which are not mitigated by a fire break and especially a fire break that does not surround the primary area(s) of concern.

It states that those fire risks "Can be mitigated through COAs", specifically:

OP-11(F) and OP-12(A-C) **limit accepted waste**, maintain a working fire truck on site, monitor and log, and provide records relating to fires.

> Approval of this application triggers removal of the intake cap, not only on the NEW SOUTH LANDFILL, but, per the 2020 Franchise Agreement, on the westward quarry expansion that the Applicant has already begun filling.

> No Conditions of Approval on the application before you would constrain the Applicant from disposing of as much waste as the Applicant wishes (“organic” or otherwise) in the 14,000,000 CUYD of airspace in existing landfill airspace, Staff has been very clear on that.

In County staff's slide deck, **page 3**, under "**Public Comments**", Staff shows no Fire or Fire Risk comments on the color wheel of comments.

> To date, at least 74 records have been received by the county from at least 52 entities (people, services, organizations, and businesses) expressing concern regarding fire risk at the Coffin Butte Landfill. These risks cover volunteer firefighters, ODF responders, citizens, toxic fumes, wildlife, endangered species, property, businesses, emergency communications, forests, historical sites, emergency egress, homes, communities, utilities, services, character of the area, livestock, etc. Appendix A includes the links to these records.

With the approval of LU 24-027, the **existing intake cap** that **currently constrains the Applicant's** maximum yearly volumes **is removed**. The Applicant is then free to increase yearly volumes in the 14,000,000 CUYD of existing permitted landfill space with no constraints.

No constraints include no constraints on flammable material. Think of vape devices or lithium batteries coming in via garbage, and Republic trying to detect or screen for those, or find them in the giant mounds of garbage. These devices are susceptible to thermal runaway, which can be exacerbated by crushing or water, and can burn at extremely hot temperatures in the absence of oxygen.

All of these risks cannot be mitigated by the proposed conditions of approval. None of the conditions prevent a fire from starting, none detect a fire that has started, none monitor a fire that is allegedly extinguished after hours, and none of them will prevent a fire from spreading, and causing undue harm to our ARFPD volunteers, our forests, emergency radio equipment, our communities, our health, or the character of the area.

Please deny this Application for expansion.

Sincerely,

Virginia Scott

Appendix A - Fire Records Received by County as of 7-16-25

(In alphabetical order, retrieved using “fire” search in Munidocs)

Kimberly Bales:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d0a11b0a0

Kathleen Bartee:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696a303b0f5

Beyond Toxics:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=828798b139dcf

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287995ac191c

Mardi Bilsland:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=82b98b4921bce

Bit By Bit Board:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=828797ed725c2

Erin Bradley:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166da5efd29c

McKenna Bradley:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8286bb1eb8929

Pamela Castle:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166a3145a68e

Bethany Dengler-Germain:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696ae475d31

Kiko Denzer:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166a31a06b92

Paris Edwards:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166cd0a35e3e

Ken Eklund:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166ed1970b76

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0e5432b82d

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81670690c51c1

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=82879933c31a5

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816704617dddf

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81670791773ef

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816708dd58af3

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=826f5aa37393c

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166fba5e5b22

Kristina Fauste:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166cf7e2b971

Ian Finn:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166ce60315e1

Rana Foster:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287999900c21

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816705b421ed7

Joel Geier:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=82879a032c3b4

Shean Germain:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816968a3f1998

Victoria Gordon:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166a5b6616df

Pete Gruendike:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166cf7f8803c

Abigail Haberman:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816968e067d97

Dr. David Hackleman:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166f5dd2f495

Stacy Hampton:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8169689cd4eb6

Aaron Harris:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696ca0debf7

Kate Harris:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287992bcb718

Camille Hall:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0ddf2dc9e2

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8287983bfe7cf

Mark Henkels:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=826f59ed966ff

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0ddf13881b

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0e4804964b

Nancy Higgins:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8292e331cebba

Duane Jager:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166cdae45a14

Richard Kipper:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d91c41b5d

Robert Kipper:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=816968ec12a76

Jeff Kleinman:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=828799bb1830d

Ken Kupperman:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0c7eb2fdda

Melissa Livingston:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d3db43dcd

Lynne McAllister:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0c9f740b1d

Carol McClelland-Fields PhD:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81697012db6d1

Lois Mellem:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166ebb89d966

Hilary Metz:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166c7274b054

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166c754fad9f

Eliza Murphy:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d2a99b353

Debbie Palmer:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8292e334f8300

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=826f5a0427f12

David Patte:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696b3b0cfcf

Elizabeth Patte:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81696b63dcf5d

Marge Popp:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=82879996cb402

Ken Robertson:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d346d0bee

Jenny Saarloos:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=828797e4c4f6e

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=828797d8a0ef6

Virginia Scott:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8135d6da5a4f1

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8292e33a1d682

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https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166eb36b5cdf

Carol Searls:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166d0bf1d05d

Marybetts Sinclair:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8169694bbdd5d

Joanne Patricia Stevenson:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166a315de2b5

Dr. Shelley Su:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81c0db98957e7

Robin Vega:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8166cefed0e36

VNEQS:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8110bba734f94

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=823036bb663ac

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=81da86e0a2d8a

Nancy Yialouris:

https://library.municode.com/or/benton_county/munidocs/munidocs?nodeId=8169681e4198e