



ENRAC Deliberations on CUP Expansion Application

REPORT: April 8, 2025

The following Report was created by ENRAC based on a worksheet that each member completed. Topics were identified at the March 12 meeting, and each row within the “Topic/Issue” is from an individual ENRAC member. No effort was made to aggregate or find consensus per topic.

Overview

The following are resources, considerations, potential impacts to consider, and a general framework for ENRAC Members to evaluate Republic Services’ application for a Conditional Use Permit (CUP) to expand the Coffin Butte landfill. ENRAC will develop a recommendation to be submitted to the Benton County Planning Commission to reject, accept, or accept the application with conditions. There is no legal or formal required length, content, or structure for the recommendation. The recommendation must be voted on and approved by ENRAC by April 22.

CUP Application Materials

The following are links to the CUP application & related materials:

- [Landfill expansion application](#) (submitted July 19, 2024)
- [Revised application](#) (submitted Oct. 30, 2024)
- [Additional information](#) (submitted Jan. 15, 2025)
- [First Addendum to Burden of Proof](#) (submitted March 14, 2025)
- To learn more about the decision process visit bentoncountyor.gov/coffin-butte-landfill

What to Consider Per Code

Per Code [53.215](#), the following are the considerations, but not limited to, when evaluating the CUP:

The decision to approve a conditional use permit shall be based on findings that:

- (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; and*
- (3) The proposed use complies with any additional criteria which may be required for the specific use by [Benton County Development Code](#). [Ord 90-0069]*

The following are additional Codes as reference:

- [Chapter 23 – Solid Waste Management](#)
- [Chapter 77 – Landfill Site \(LS\)](#)

The following should be kept in mind when evaluating the application:

- Your analysis must focus only on the expansion area, NOT the landfill itself or its history
- The definition of “area” can be interpreted by you and/or by issue; such as, impacts to neighboring communities, impacts that go beyond the landfill, impacts on other jurisdictions, etc.
- You can consider & evaluate short-, mid- &/or long-term Impacts
- Benton County cannot control where the waste that is received at the landfill originates

- If the application is approved, the current cap of 1.1 million tons accepted per year will cease
- If the application is approved, Metro (Portland area's disposal district) will not be able to send materials to Coffin Butte per existing policy



ENRAC Deliberations Framework for CUP Application

The following is a framework to organize topics to be analyzed and feedback to be captured. The objective is for ENRAC Members to agree on a recommendation to the Planning Commission via either consensus or by majority vote. The 'Topics & Issues' were captured from the March 12 ENRAC meeting. For 'Potential Impacts', include your thoughts, research links, and/or any items for ENRAC to consider. For 'Thoughts on Recommendation', include your positions or perspectives on whether the Topic/Issue leans you to recommend approval, denial, or approval with conditions for the application. Staff will compile all comments as sent for discussion at the next ENRAC meeting. Lastly, please identify any additional topics you want included and/or thoughts on reorganizing the current framework.

Abbreviations noted, if not extensive:

- BC Benton County (though usually as Benton County Governance)
- BCC Benton County Commission (& Commissioners)
- BC PC Benton County Planning Commission
- CUP Conditional Use Permit (application in consideration; assumed to be most recent unless noted)
- CBL & CB Coffin Butte Landfill, also Coffin Butte, but implies and implicates ownership by Valley Landfills, Inc. and Republic Services Operations
- EPA Federal Environmental Protection Agency
- DEQ Oregon Department of Environmental Quality, assumed to be Oregon chapter unless otherwise noted
- GHG Greenhouse Gas Emissions, typically CO₂ and methane, though others exist
- ENRAC Environmental and Natural Resources Advisory Committee
- DSAC Disposal Site Advisory Committee
- SWAC Solid Waste Advisory Committee
- VOC Volatile Organic Compound

All recommendations and documentation below assumes the inclusion of the above CUP Application documents already outlined in this letter.

All documents cited in this letter are shared here: https://drive.google.com/drive/folders/1K2eYDx56-TTG-xx_LOCHjr0iOagkuwSV?usp=sharing

ENVIRONMENTAL IMPACTS

Topic/Issue	Potential Impacts	Thoughts on Recommendation
Air Pollution		Methane is released from landfills, so if expanded there is potential for increased methane GHG emissions. On the other hand, if the landfill were to not expand, there will be increased air pollution elsewhere as the region may have to truck our waste further to dispose of it.
		Approve with conditions, such as increased monitoring and stronger sorting of organics.
	Increased particulate matter and odor emissions during construction and expanded landfill operations. Possible worsening of local air quality for nearby communities	approval with conditions: Require air quality monitoring stations and dust suppression strategies during construction and operation
	local smell; methane leaks	
	❖ Odor Issues – see below Odor section ❖ VOC Emissions	
	<ul style="list-style-type: none"> • Oregon warns Coffin Butte Landfill over methane emissions • DEQ - Landfill Methane Emissions Reduction • Oregon regulators pause Coffin Butte Landfill air quality permit process • Coffin Butte Landfill • EPA Coffin Butte Inspection Report Summary – Beyond Toxics • EPA Inspection Report 	Methane leaks seem to be a continuous issue for the landfill. After DEQ and EPA inspections, CB did not meet the guidelines for a methane flare, for methane leaks, and for methane reduction. As of Jan 2025, the DEQ had to pause its air quality public comment period and permitting review process for the landfill. CB's air quality permit has not been updated since 2009. This update has not happened yet because Republic Services claims to not be able to find their paperwork. The DEQ is currently letting them run the landfill with an expired permit until they can find this paperwork. This seems suspicious to me, especially because the EPA announced how CB was violating limits for as how much methane is leaking from the landfill. Application should be denied, as their air quality permit is not up to date and CB is violating federal methane regulations.
Greenhouse Gas Emissions	Methane emissions are a huge concern.	<p>Recommend requiring the most stringent applicable standards for monitoring and ameliorating, with independent monitoring of that monitoring.</p> <p>See Row 2 above.</p>

	Additional methane and CO ₂ emissions from increased waste volume	approval with conditions: Ensure strong GHG mitigation plans (e.g., expanded gas capture system, renewable energy utilization) and regular reporting
	methane no smell, but cited for leaks in June 2024 with ruptured plastic covers full report 8/24	
	<ul style="list-style-type: none"> • Methane Emissions <p>Considering the extensive documentation below, with some focus on the “CBL and EPA - timeline.pdf,” and its supporting documents.</p> <p>See documents:</p> <ul style="list-style-type: none"> • CBL and EPA - timeline.pdf • ENRAC - EPA Jun 2022 CBL Inspection Report - Heinz.pdf • ENRAC - EPA Jun 2024 CBL Inspection Report - Conley.pdf • ENRAC - EPA Subpoena CBL January 2025.pdf • ENRAC - Planning Commission Findings and Decision 2021.pdf • EPA landfill area demographics 1 mile radius exp.png • EPA landfill area demographics 3 mile radius exp.png • EPA landfill area demographics 5 mile radius exp.png • The Hidden Costs of Landfills.pdf • 5.3 Delegation of BCC 77 Duties from SWAC to ENRAC - 240702 - Order D2024-048.pdf • 133902.pdf • A huge landfill in Oregon is spewing methane. Its... _ Canary Media.pdf • Benton County News July 112024.pdf • Benton Cty Land Use Appl Process Map.pdf • CB Aerial Map.pdf • CB Basic Facts.pdf • CB CUP Process Flow Chart.pdf • CB Ex. Summary.pdf • CB Expansion Overview.pdf • Coffin Butte Online Resources.docx 	<ul style="list-style-type: none"> • Methane Emissions – JAS 2025-04-02 <p>Considering the extensive documentation provided, with some focus on the “CBL and EPA - timeline.pdf,” and supporting documents, a general pattern of institutional negligence is observed that needs important inculcation.</p> <p>CBL was monitored by the EPA on at least two separate occasions, 2022 and 2024, both times finding significant methane emission events at various sites at the CBL site inspected. It is noted in the CUP that the events from 2022 inspection events were deemed addressed. The 2024 inspection, to my reading, did not include official DEQ or EPA action items merely from their reporting, so no action was required from CBL.</p> <p>However, within the further documentation provided, between a faulty and slow regulation and observation process between OR DEQ and EPA (my reading on jurisdictions are complicated and not always fully understood), a narrative suggesting that methane is not adequately and immediately addressed on site still remains. By my reading, had the spot inspection in 2024 been more successful and redress of previous infractions were more consistent, the need for Sen. Merkley, state officials, and local efforts by SGB to suggest further institutional and regulatory oversight may have been unnecessary. Instead, it can be observed that an incomplete and inadequate regulatory framework has led to at least a learned and institutional lack of a culture of caring for the landfill and assuring methane security has been consistently met. Other details in the supporting documents (business info subpoena, resignations at CBL environmental lead) lend shade, if not fully realized or corroborated, that the system is not stable. The very recent activity of the EPA and DEQ suggest they are still in the process of understanding what to do about recent inspections and how to approach CBL in their infractions. As such, this is clearly an in-progress issue.</p>

	<ul style="list-style-type: none"> Email August 2024 Wyden Merkley Hoyle Urge EPA to Investigate Landfill Concerns in Benton County.pdf Email June 2024 - URGENT Methane Leaks at Coffin Butte What You Need to Know.pdf ENRAC Collab OneNote.pdf EPA Inspection of Coffin Butte Landfill Accumulation of Flammable Methane.pdf FAQs Benton Cty. June26.pdf FAQs Coffin Butte.pdf FINAL SGB Letter to Sen. Merkley - Coffin Butte Landfill.pdf Gmail - Coffin Butte Resubmits 2023 Annual Landfill Report.pdf July 10 ENRAC Meeting Video Recording.pdf OPB Interview How much methane seeps out of Oregon landfills.pdf SWACRecommendation.pdf Testimony in support of SB 726 133902.pdf Landfill Methane - Moms Clean Air Force.pdf Benton County Talks Trash Final Report: bctt_final_report_4-11-2023.pdf - https://cd.bentoncountyor.gov/wp-content/uploads/2023/12/bctt_final_report_4-11-2023-1.pdf 	<p>Further, that the State of Oregon is currently considering SB 729 (with further supporting documentation included), suggests that a further need for improved and increased monitoring and regulation is required before the current institution of methane security can be achieved.</p> <p>It is also noted that methane is the largest factor in consideration here for GHG emissions, and while power co-generation and plume burning is present, the emissions from leakage is the biggest problematic part of that.</p> <p>It is also noted that methane leaks should also be associated with odor, VOC, and other volatile pollution emission as methane itself acts as increased carrier gas for those pollutants. Monitoring and testing of those leaks should be better understood.</p> <p>Further testimony and reporting in the Benton County Talks Trash documentation should be fully considered, of course. The history of SWAC, DSAC, ENRAC, BC PC, and BCC are all complicated in the assessment of methane emissions alone.</p> <p>Therefore, it is recommended that until further and fully demonstrable progress can be made to have site inspections be more successful and consistent, that methane can be assured to be secure upon random inspection, in-progress EPA considerations fully resolved, and the case for SB 729 and improved methane regulation and monitoring is resolved, the present CUP application should be denied.</p> <p>These progressions may constitute need for further consideration and redress in a further CUP, but because of the lack of real enforcement within a “recommendation with conditions,” at this time, a full denial is the safest route.</p>
Leachate	Leachate is quite dangerous and after learning from Beyond Toxics that landfills liners do not last forever, it is scary to know that toxins are leaking into the soil and groundwater.	Approve with conditions, such as increased groundwater and river monitoring.

	Increased waste volume could produce more leachate, potentially posing risk to groundwater and surface water if not managed properly	approval with conditions: Strengthen leachate collection and treatment infrastructure; require third-party audits of system capacity
	will never be free of PFAS, endocrine disruptors in humans (and likely other creatures)	
	<ul style="list-style-type: none"> • Potential toxicity of leachate from the municipal landfill in view of the possibility of their migration to the environment through infiltration into groundwater • Requirements for Municipal Solid Waste Landfills (MSWLFs) 	<p>According to Benton County's Environmental Assessment for 2022-2023, CB released about 30 billion gallons of leachate. CBL is alongside Soap Creek, a tributary of the Luckiamute River that flows directly into the Willamette. This means that toxins are flowing into our water. The Environmental Assessment claims that all this leachate is within drinking water standards but that does not necessarily mean that this isn't harmful to the ecosystem. The landfill is also built on previous wetlands, meaning there is a direct connection to the ground water. The plan for the expansion also shows the creation of new wetlands right beside the landfill. The EPA has requirements against siting and expanding landfills on or near wetlands. Expansion of the landfill should be denied so we are not supporting further environmental degradation and pollution from leachate toxins.</p>
Soil	Risk of contamination from accidental leachate release	approval with conditions: Require soil testing and protective barriers; implement best practices for soil erosion control
	possible toxins on site, soil contents will leach into local wetlands and eventually our waterways, which all connect to oceans	
Toxicology	Potential long-term exposure to hazardous materials or pollutants through air, water, or soil pathways if not properly managed	Require a toxicological risk assessment and mitigation plan
	arsenic, heavy metals	
	<p>JAS – 2025-04-07</p> <p>Comprehensive toxicological analysis of leachate, groundwater, airspace, plume, flaring, and network effects is complex.</p>	<p>JAS - 2025-04-07</p> <p>With the complexity of all of the environmental testing posted elsewhere, merely taking any one of the signs of environmental and human impact may yet still paint an incomplete picture. Toxicological effects may not actually be seen unless comprehensive testing within the ecological matrix is observed, as synergistic effects from various pollutants may not be observed from individual contaminants observed. This is a difficult testing space to evaluate,</p>

		<p>but current technology is building to accommodate air and water combined testing. Some effort should be made to consider that toxicological space as that effort has not been adequately seen in the CUP.</p> <p>Therefore, it is strongly recommended that a vetted, comprehensive toxicological analysis approach become a requirement for any approved CUP and indeed continued monitoring at CBL. Without systemic understanding of the toxicological effects, individually considered contaminants may not show the full impact of the proposed changes.</p>
Water Pollution <i>(surface &/or ground)</i>	Huge concern. Not sure how to separate out leachate, soil, toxicology that all seem to relate to the nasty stuff in the water coming from the landfill.	Recommend requiring the most stringent applicable standards for monitoring and ameliorating, with independent monitoring of that monitoring.
	Leachate seepage could contaminate groundwater or nearby surface water bodies, especially during extreme weather events	approval with conditions: Strengthen barriers and conduct hydrogeologic studies to guide water protection
	post waste water treatment of leachate, it will go into our waterways with unfilterable PFAs and other potential toxins. This will eventually be in our oceans. Landfills are not allowed to be built currently on wetlands. Coffin Butte was sited well before EPA developed guidelines for safer siting of landfills, see attached guidelines. It is sited on wetlands and a tributary of? Soap Creek runs right by it.	
	<ul style="list-style-type: none"> • See also Leachate discussion • Arsenic Issues & Groundwater • PFAS pollution <p>Documents:</p> <ul style="list-style-type: none"> ❖ LandfillRelatedWaterQualityIssues.pdf ❖ J Geier to BoC groundwater arsenic Aug 2024.pdf 	<ul style="list-style-type: none"> • Arsenic Issues & Groundwater – JAS 2025-04-02 <p>Numerous documents, with focus on the “LandfillRelatedWaterQualityIssues.pdf” report suggest that the situation with Arsenic contamination is not fully settled. My reading of the material suggests that there could be potential leak issues or contamination from the landfill infrastructure, though indeed better evidence is needed and evidence to the contrary is presented.</p> <p>Therefore, without additional evidence, the BC PC is recommended to take particularly close look at whether combined evidence here or elsewhere can constitute a clear and present danger to local environment and groundwater. It is not currently clear that the CUP presents a danger to environmental impact and several important gaps in testing and knowledge seem to remain.</p>

	Those who rely on well water and live around the landfill or Soap Creek may be exposed to the leachate toxins.	
Monitoring (general &/or specific)	Huge concern. Based on press reports, Republic has been less than stellar in monitoring and ameliorating methane emissions	I think strong monitoring is super important.
	Need for expanded and more frequent monitoring of air, water, and soil quality due to the scale of the proposed expansion	approval with conditions: Set mandatory monitoring frequency, real-time data access for the public, and independent oversight of monitoring results
		There has clearly been issues with CBL's monitoring standards as the EPA and DEQ continue to show CB's violations. Due to these violations, the expansion request should be denied because there CB is not showing trustworthy information or sharing about the air and water quality data.
Regulations (general &/or specific)	Expansion must comply with state and federal regulations regarding landfill operation, emissions, water protection, etc.	CUP approval contingent upon full regulatory compliance with DEQ, EPA, and county requirements, and routine compliance verification
Other?	Climate resilience concerns	
	My understanding is that Coffin Butte, because of local geology/soil, is not a sight that would be selected for a start-from-scratch landfill. The landfill is there only because of the old Camp Adair dump.	If the expansion is granted, specify that no further expansion will be allowed. After the 5 or 6 years "bought" by the expansion, shut the place down. Permanently. Begin planning now for a new appropriate site.
	JAS – 2025-04-07 Consideration of the "natural" ecology of the landscape to have its own voice.	JAS – 2025-04-07 See below comments within Network/Systemic effects.

Links to be included above under "Air Pollution" & "Greenhouse Gas Emissions":

<https://cdn.sanity.io/files/xdjws328/production/657706be7f29a20fe54692a03dbedce8809721e8.pdf>

<https://www.opb.org/article/2025/01/18/epa-inspection-coffin-butte-methane-leak/#:~:text=An%20Environmental%20Protection%20Agency%20inspection,the%20town%20of%20Adair%20Village.>

Recent report that includes CB. Methane emissions are an issue here:

<https://cdn.sanity.io/files/xdjws328/production/b562620948374268b8c6da61ec1c44960a8d5879.pdf>

HUMAN IMPACTS

Topic/Issue	Potential Impacts	Thoughts on Recommendation
Local Residents / Community		Vocal residents are quite opposed to the expansion. If we do not expand, the county is yet to come up with options for where our waste will go.
	Increased traffic, noise, and perceived risks may affect quality of life. Expansion could raise long-term concerns about property values and environmental health	approval with strong community engagement: Require a community liaison, grievance mechanism, and public outreach before and after expansion
	local smell complaints are common among local residents	
	<p>Local Residents & Community</p> <ul style="list-style-type: none"> Benton County Talks Trash Final Report: bctt_final_report_4-11-2023.pdf - https://cd.bentoncountyor.gov/wp-content/uploads/2023/12/bctt_final_report_4-11-2023-1.pdf 	<ul style="list-style-type: none"> Local Residents & Community – JAS 2025-04-02 <p>The Benton County Talks Trash initiative, spurred by the original 2021 CBL CUP and general public outcry, is an important summary of the local, historic, and community perspectives related to this CUP.</p> <p>As public comment will likely corroborate, there is a very mixed and vocal community, especially those within close proximity to the landfill, that have concerns. NIMBYism is a constant issue with any large project, though indeed the backyard being a landfill is more dramatic than many.</p> <p>There is important consideration and network effects with the consideration of local residents. Shall the concerns of a vocal minority lead the discussion, even when they are the ones most impacted by those changes? Generally, it would be the assumption from the ENRAC Board that this is true—externalized pollution has been a classical and on-going environmental justice issue, especially when that minority, however vocal, is denied its rights and due process—and even then—to resist a distant majority willing to sacrifice a portion of health and well being elsewhere.</p> <p>Therefore, it is extremely important that any evidence that the above environmental impacts to local residents be considered with the greatest of weight towards the recommendation or denial of this present CUP. The planning commission needs to carefully incorporate all those voices, views, and evidences of impact.</p>

		Therefore , due to numerous concerns within the BCTT report and issues raised about further expansion of the CBL, the present CUP application should be denied.
Odor	Landfill expansion may lead to intensified odors, particularly during warmer months or operational changes	approval with conditions: Install additional odor control systems and require real-time odor monitoring with public reporting
	<ul style="list-style-type: none"> Odor Issues <p>Odor is a complex metric. What can be smelt by humans is not linearly associated with what may be present in air and air samples, even if testing were possible at every instance.</p> <p>Perhaps similarly, a variety of VOCs and various airborne pollutants are not detectable at all by scent and constitute a difficult monitoring and regulation problem.</p>	<ul style="list-style-type: none"> Odor Issues – JAS 2025-04-02 <p>Odors may be considered a carrier metric for various other pollutants, VOCs, and quality of life around an undesirable infrastructure.</p>
Social/Societal		I am curious about the future impacts of the landfill on society. 10, 25, 50 years from now?
	Risk of inequitable burden on low-income or marginalized communities; perception of being a 'dumping ground.'	approval with equity assessment: Conduct a social equity impact analysis and engage directly with impacted residents.
	<ul style="list-style-type: none"> Targeting minority, low-income neighborhoods for hazardous waste sites Environmental and socio-economic impacts of landfills The Hidden Damage of Landfills Which came first, people or pollution? Assessing the disparate siting and post-siting demographic change hypotheses of environmental injustice 	<p>Those living around landfills are seen to experience high rates of cancers, birth defects, and other health issues due to the toxins released into the soil, air, and water. Aside from health issues, landfills also decrease property values which could make it difficult or near impossible for residents near the landfill to sell their homes and move away. In addition, all the news and controversy surrounding CBL may lower home values even more and even deter people from moving to the area.</p> <p>Landfill siting and regulating processes seem to follow “the path of least resistance” (Mohai and Saha 2015) which is how CBL and Republic Services has been exerting its power. This means that when there are little resources being dedicated to the opposition, the landfill owners have a stronger voice in the matter. Low income and communities of color have been seen to be targeted for landfills and other toxic sites. Rural landowners near CB are being targeted here.</p> <p>The landfill expansion request should be denied, as it is causing</p>

		many harmful impacts to Benton County residents and has the possibility to cause health issues like cancer and birth defects.
Other?	Mental well-being concerns among community members	
	<ul style="list-style-type: none"> • Chronic stress puts your health at risk 	The stress of this toxic landfill is not doing good for community members and residents around CBL. Stress in combination with the other issues of the landfill can drive health problems for our locals.

MONETARY IMPACTS (suggestion to change to “Economic Impacts”)		
Topic/Issue	Potential Impacts	Thoughts on Recommendation
Economics		If the landfill does expand, it can help to maintain the jobs that are already employing those who work at the landfill and the waste haulers.
	Could result in job creation, increased tax revenue, and economic growth locally, but also pose long-term infrastructure costs	approval with conditions: Request an economic cost-benefit analysis and transparent budgeting for public infrastructure use
	county will have decreased income if landfill does not expand Human health value must be considered.	
	<ul style="list-style-type: none"> Benton County Economics: <p>Supporting Documents:</p> <ul style="list-style-type: none"> ❖ Basic_Economics_of_Coffin_Butte_Landfill.pdf ❖ Benton County Talks Trash Final Report: bctt_final_report_4-11-2023.pdf - https://cd.bentoncountyor.gov/wp-content/uploads/2023/12/bctt_final_report_4-11-2023-1.pdf ❖ SPLG_Waste.pdf - https://cdn.ilsr.org/wp-content/uploads/2020/12/SPLG_Waste.pdf 	<ul style="list-style-type: none"> Benton County Economics – JAS 2025-04-02 <p>Of note in the provided report, BC stands to continue and increase benefit fairly significantly in the associated costs and use fees of hosting CBL within Benton County. While there is nothing necessarily wrong with that, it is important to make clear and transparent that this is happening. Economics and politics always make corroborations, but to understand them and their implications is key.</p> <p>However, of greater note in this report and as raised in BCTT reports and commentary, the elimination of intake caps is most concerning. With a noted recent pattern from 2019 onward and changes in the regional landfill options, CBL has increased to near present intake capacity. The CUP, if approved, would eliminate any cap on intake, allowing significant increases in waste intake from regional outlets. While it is acceptable to assess the longevity of the present intake and fill rates as stated in the CUP, my reading is that it is not mandated or regulated how long that capacity need remain as stated.</p> <p>The pending SMMP and further changes in local and regional solid waste and material processing is encouraging. However, it is consistently noted that Republic and other waste management corporations have consistently dragged and prevented in providing actionable alternatives to landfill use—it being cheaper and easier to continue with old practices than spurn new activity, collaborations,</p>

		<p>real and demonstrable recycling and composting options, and creative solutions within the current system of waste management.</p> <p>As such, extending the CBL and approving the CUP does not put due economic pressure on BC, infrastructure, and cultural practices in order to instigate better SMMP and waste management practices. It only extends the inevitable need to do so, and worryingly so.</p> <p>It bears repeating, Republic Services is a for-profit, publicly traded corporation. They stand to continue to extract wealth from our local trash infrastructure and culture.</p> <p>Therefore, without better consideration, coordination, and pressure to change current waste management practices, the present CUP application should be denied.</p>
Ratepayers & Fees		If the landfill does expand, fees may not change. Maybe a different rate style could help to alter how much waste is entering the landfill.
	may increase if landfill is farther away	
	<p>JAS – 2025-04-07</p> <p>Residents in Benton County do not have an equitable choice in its decision for waste disposal. The provided options constitute a local monopoly and should be redressed.</p>	<p>JAS – 2025-04-07</p> <p>Changes to the CUP and CBL functioning will likely change operation rates as expected in future system management. That said, creative solutions to equitable and sustainable distributions of the costs of CBL and CUP activity is recommended. E.g., income based cost burden, community, city, and county partnership and subsidy in that cost, and other environmental justice based solutions should be included. As Republic Services is a for-profit corporation, Benton County, City of Corvallis, and the residents should not merely be supporting the profits of said corporation when there is little to no competition for residents to choose from for waste and recycling options.</p>
Other?	City of Corvallis already stopped taking leachate for waste water treatment, which was financial loss	

SYSTEMIC/NETWORK EFFECTS		
Topic/Issue	Potential Impacts	Thoughts on Recommendation
Regional Impacts		If the landfill doesn't expand, I am not sure where our trash will go.
	Could shift regional waste dynamics; some counties may become more reliant on Benton County for disposal (?)	approval with regional coordination: Encourage regional waste planning and develop an inter-jurisdictional framework for impact management
	<ul style="list-style-type: none"> • History of Coffin Butte • What is the Typical Lifecycle of a Sanitary Landfill? • Coffin Butte Site Life Working Group Report 	<p>With the SMMP and future mandated task force, the region is trying to scramble to create a waste reduction plan in preparation for the closure of CBL. While the expansion may provide more time for a stronger material management plan, it comes at the detriment to the community and the environment.</p> <p>There are already major impacts to the region, since the landfill is set to close in the near future, with and without the expansion. A normal lifespan of a landfill is 30 to 50 years and CB has been used since the 1940s with Camp Adair. Benton County shares that the lifespan of CB has been "historically overestimated".</p> <p>The expansion should be denied so the landfill can close at its expected date in 2038. It is well past the average lifespan of landfills, and we have other options instead of expanding.</p>
Sustainable Materials Mngt.		This section is crucial to consider.
	Expansion may disincentivize upstream waste reduction, reuse, and recycling if capacity is too easily available	approval with conditions: Require landfill operator to invest in or support waste diversion programs and tracking of material flow
	<p>JAS – 2025-04-07</p> <p>"Recycling" has long been touted as a solution to waste management, but between industry producers and waste-handlers, has been a façade of disinformation from many angles.</p>	<p>JAS – 2025-04-07</p> <p>Real recycling options would be encouraging, and the new Eugene/Springfield management system access agreement or similar proposed local deployment would go a long way to encourage and engender confidence in Republic Services / CBL waste streams, and in consideration with the SMMP. Since Republic is a for profit corporation, I think increased investment would improve their image dramatically. That's outside of the realm of this CUP directly, but as systems connect, it would be nice to see those. Without seeing</p>

		those examples of industry led improvements, the status quo operations are not recommended.
Waste Transport <i>(additional mileage, GHG emissions, traffic, roads, etc.)</i>		I think this is important to consider. The landfill is already here, so expanding means that another one will not have to be built yet. If it is not expanded, we will have to truck our waste further. Is there potential to use the trains?
	Increased truck traffic could worsen road conditions and contribute to emissions, especially if haul distances increase	approval with conditions: Include traffic impact analysis, road maintenance agreements, and transportation-related emission offset programs
	It seems like this is something that Benton County is currently working out and they have more details than ENRAC.	
	JAS – 2025-04-07 Some kind of waste transport is guaranteed; minimizing that with more efficient and lower carbon options is helpful. Consolidation and shipping is often a better solution than pick-up truck transport. All of which depends on where trash is coming from.	JAS – 2025-04-07 While GHG emissions from carbon based transport are key, consolidation and location of waste pick-up is a large portion of that calculus. Corvallis and Benton County are relatively close, but if more trash (without a intake cap) comes from further away, there may be less of a conservation of carbon footprint unless those further waste regions are consolidating their transport. This is a tricky analysis, and further examination is warranted depending on variables of intake cap, locations of accepted waste-streams, impacts of other waste disposal opening and closing, improved recycling, composting, and SMMP efforts, etc.
Other?	Risk of future inter-county political tensions or resistance to further expansion proposals	approval with planning safeguards: Establish a landfill lifecycle strategy
	JAS - 2025-04-07 Exit Strategies Rights of land spaces and ecologies to exist. See Toxicology above as a Systemic/Network Effect	JAS – 2025-04-07 Agreed, in any future solution, a clear and public CBL exit strategy seems vital and necessary. Even if this CUP is approved, that approval will likely continue to wane, and everyone wants a better solution with more options and SMMP solutions to prevent need for landfill at any location. Idealistic, but still important to consider in the long term. JAS – 2025-04-07 While an “environmental” consideration, I put this consideration of the rights of ecologies to exist without the direct need for human utilization. Indeed, a nod towards the proposed land use within the

		<p>CUP will change the ecology of that land significantly and there is both building if nascent recognition and understanding that ecologies should have their own voice and independence in that relationship to humans and the built environment.</p> <p>That said, a stewardship model of the landscape would be an important consideration of the wetlands that will be destroyed in the current CUP. Is stewardship of our lands, respectful of those lands, consider the CUP a good use case for its destruction?</p> <p>JAS – 2025-04-07 See Toxicology comments above; noted that they are systemic issues.</p>
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Additional Comments from ENRAC Members

Proposed new intro language:

As discussed, I think these comments should have authorship tagged on them as well. These should have a preface of some kind, e.g.,:

“As ENRAC members, our voices are diverse and intend to hold the follow space for our individual comment *as ENRAC board members*. That said, not all ENRAC members will fully agree with these personal statements but agree that the should have that space here over individually submitted commentary.
-ENRAC board”

Overall recommend not expanding landfill. it was a poor initial siting, and there are local wetlands that cannot be protected from the leaching toxins and PFAS due to landfill contents. The landfill and repercussions that result will effect the area and our water for a long time, possible forever. (PFAS are considered forever chemicals). Expanding the landfill will only worsen this issue.

Yes, this will increase the cost of getting rid of garbage, and decrease income to the county.
Human health is invaluable, and this cost cannot be overstated.

From Jason Schindler, current ENRAC chair – 2025-04-07

I have to write this piece because our process necessitated its reflection. It is not complete, though it would be difficult to say any part of this decision making process could or would be, even at time of writing.

As with most things, what most of environmental action and consideration really requires is a good story that can conceptualize and narrativize the data, facts, experiences, and influences that play upon the complicated task at hand. Our process in ENRAC does not encourage that well, in fact eludes it quite intentionally I believe. But as I have been appointed its chair and have the background to understand that, it is also my necessity to encapsulate and present what I have experienced.

From the Benton County Commissioners and BC Planning Commission:

From: “5.3 Delegation of BCC 77 Duties from SWAC to ENRAC - 240702 - Order D2024-048.pdf”

NOW THEREFORE IT IS HEREBY ORDERED, the Environment & Natural Resources Advisory Committee is delegated the duties and responsibilities formerly assigned to SWAC in BCC 77.305 without further action by the Board. This delegation is limited to “review and make recommendations through the Planning Official to the Planning Commission regarding the Site Development Map Plan and narrative.”

But this mandate has taken on a variety of articulated forms, largely from BC staff, from apparently needing to assess the CUP on ENRAC’s base of expertise, to considering what documents and resources we were interested and willing to find (many included above), to a consensual and binding vote, to merely providing

some commentary and recommended reviews to the BC PC, many overlapping with varying degrees of clarity. To point, we are all variously qualified volunteers with extremely limited direct expertise and available time to do so.

While every opportunity to allow ENRAC to make its own decisions and assessments has been voiced by BC staff, and they have taken every opportunity to be supportive and helpful, additional concerns are noted.

Relationship to VNEQS (<https://www.coffinbuttefacts.org/>), the online portal and vocal discussion community to deny the landfill expansion, has understandably been straining to BC. However, VNEQS activists have been directly vilified by staff in meetings (e.g., “they’re not good people”). Similar sentiment was levied against the outgoing and dissolved SWAC board as well. While this is taken with a grain of salt, as well as an obfuscation about what exactly happened within SWAC and the complicated history (some of which is piecable by BCTT reporting), it is still clear that BC staff have a clear and present preference and some chips that may not evidence a level playing field.

Most recently, and demonstrably to the operation of the ENRAC board, only now, under more direct scrutiny, are public meetings laws and regulations, active and enforceable for over a year, being clearly articulated and enforced to ENRAC meetings and practices (though, indeed, other boards seem similarly complicated and confused). The laid back culture of ENRAC has generally allowed for a sense, if underutilized, that collaboration and communication was easily allowable. Understandably and problematically, present public meeting laws, as articulated by BC staff, do not allow for direct communication between board members on any aspect of deliberation, most communications synchronous or asynchronous assumed to contain deliberative aspects, resulting in communications being constantly filtered, documentation sharing constrained, and all meetings and contents required to be made public while the process of making them public has been curtailed or impossible. While this has not been the functional operation of ENRAC since its reformulation in 2020, the recent scrutiny with the CUP mandate has activated this application of public meeting laws and made our process even more onerous, especially that we do not have the processes or practices in place before needed to allow good board functioning. It is recognized that the legislative thrust for public meetings to be transparent and accountable is important, but the ability to function as ENRAC desired or was led to believe seems curtailed by both the mandate to now abide by those rules and few practiced solutions to allow for that activity.

Additionally, in the process of ENRACs deliberations as the CUP has been approved and deemed complete for ENRAC’s assessment, with the above changes to process, the expedited nature of that assessment has been further encouraged by BC staff, suggesting numerous times than a simple vote, whatever assessment of documents and process ENRAC desired, could be done quickly and easily—moving on to next projects of the ENRAC board. While it is understandable that our timeframe was short, a certain amount of rushing the process and lip service paid to our important role in assessing the CUP is noted. The additional speediness and willingness to skip the laborious part of assessing the entirety of the CUP (1200+ pages) and any amount of introduced documentation, has been notably present.

As such, it is difficult to get a sense that ENRAC is particularly enabled or empowered to do the best job it can do to assess the very important activity we have been tasked with. Perhaps this is by a certain kind of bureaucratic design, though no sense of that is directly perceivable from BC staff—there remains a

bureaucratic and institutional inertia against a sense of ideal functioning, adequate review, and democratic thriving.

At time of writing, ENRAC remains in deliberation and in consideration of how to articulate, present, and accommodate all of these influences. And we have fleetingly little time to do that, let alone to a level of scrutiny many would deem applicable.

What needs most to be considered is what level of actionable precaution and consideration of data should be included to assess the CUP Application. There will always be more data and more opinions, more arguments and important vital considerations to every aspect of BC, community, residents, region, and environment. ENRAC understands the BC PC to have a more regimented and policy angle on its approval process, will be assessing and accumulating copious public comment and existing documentation, and we hope to support that endeavor. But, to point, ENRAC makes its assessment without those regimented needs and hopes to encapsulate a different and environmentally driven perspective herein.

Assessment at the time of requirement is what is needed.

Therefore, with the above arguments and considerations, the ENRAC board recommends...