From: N Whitcombe
To: Coffin Butte Landfill Appeals
Subject: ROAD REPAIR COSTS
Date: Monday, October 20, 2025 3:08:02 PM
Attachments: ROAD REPAIR AND MAINTENANCE COSTS.pdf

Please find a paper on ROAD REPAIR COSTS

Thank you

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N J Whitcombe

WHITE PAPER ON ROAD REPAIR & MAINTENANCE COSTS – INCREASED EXPENSES DUE TO TRUCK TRAFFIC

BCC CUP CRITERIA: 53.215(2) -- UNDUE BURDEN ON PUBLIC SERVICES

LANDFILL TRUCKING CAUSES QUANTIFIABLE EXPENSES
ESTIMATE: **45 CENTS PER MILE FOR 260,000 VEHICLE TRIPS FOR ?? MILES**

SUMMARY

TRANSPORTATION REVENUES APPORTIONED TO COUNTIES **UNDERCOMPENSATE THEM** FOR **DAMAGE DONE TO ROADWAYS** AND **SOCIETAL COSTS** OF **HEAVY LANDFILL TRAFFIC**

LANDFILL TRUCK TRAFFIC IS UNUSUALLY HEAVY WHICH DAMAGES ROADS DISPROPORTIONATELY AND IMPOSES SOCIETAL COSTS INCLUDING COSTS OF **ACCIDENTS**, **POLLUTION,** AND **CONGESTION**, ALL OF WHICH BURDEN PUBLIC SERVICES.

AN EXPANSION WILL **INCREASE TRUCK TRAFFIC** AND EXACERBATE THIS EXISTING BURDEN ON PUBLIC SERVICES.

DETAIL

Benton County is inadequately compensated for the costs of heavy semi-truck landfill traffic:

FIRST, funds flow to counties based on registered vehicles in the county, not usage

SECOND, even the highest per mile tax, 25.12 cents per mile, undercompensates for societal costs which are estimated to be in the range of 70 cents per mile.[i]

Per the 2023 coffin butte annual report, one-way traffic to the landfill comprised about 130,000 vehicles. So the landfill generates about 260,000 trips per day on public roadways. That's one trip roughly every minute during operating hours. This doesn't account for PRC traffic, leachate traffic, quarry traffic, or heavy machine transport to and from the landfill. Landfill trucks have heavy payloads; per METRO, the average payload of a semi-truck hauling household waste is 33.8 tons,[ii] significantly more than the weight of semi-trucks hauling consumer goods.

In Oregon, heavy trucks pay a per-mile tax. But this revenue is allocated to counties based on the number of registered vehicles in the county, not road usage. So a use generating disproportionate amounts of extremely heavy traffic will inflict disproportionate damage to those counties' roadways. Of landfill vehicles, only about a third originate in Benton County, per the annual report, so Benton County receives no revenues from 2/3 of landfill traffic, and must make up the difference in repair and maintenance costs from other revenue sources.

Additionally, although Oregon does progressively tax heavy vehicles, those taxes do not account for societal costs like the extra damage caused by heavy trucks when they are involved in accidents, or the pollution and congestion they are responsible for generating. These additional costs have been estimated at more than twice the costs of road damage alone.

Landfill trucks travel an unknown number of miles from various waste transfer stations throughout Oregon to Coffin Butte landfill. If each truck travelled an average of only 50 miles from origin to the landfill and back (a probable significant mileage underestimation), that would be almost $6 million in road repair and societal costs that comes out of the budgets of Benton County and all of the counties through which the landfill traffic is routed.

ENDNOTES LINKS TO CITED ARTICLES:

[i] Gorman, Michael
"A Truck Mileage Traveled Tax to Enhance US Roadway Sustainability"
Information Technology & Innovation Foundation, July 2025
https://govwhitepapers.com/whitepapers/a-truck-mileage-traveled-tax-to-enhance-us-roadway-sustainability

ii Oregon Metro
"Private transfer station rate transparency report, Rates and estimated costs at private transfer stations located in the Metro region"
February, 2019
https://www.oregonmetro.gov/private-transfer-station-rate-transparency-report

WHITCOMBE BRIEF STATEMENT OF QUALIFICATIONS
(CV including publications & awards available on request)

Nancy Whitcombe is qualified to evaluate issues involving real estate, real estate development, public finance, land use, and urban planning. She has experience soliciting and assessing documentation produced in the entitlement process. For decades, she has been involved in the land use process, both as a Planning Commissioner and as an applicant for land use entitlements.

She obtained her BA in Architecture from Princeton University and her Master's Degree in Architecture and in Environmental Design with an Urban Planning concentration from the Architectural Association in London and the University of California at Berkeley. In 2014, she finished an accounting certification program at Austin Community College in Austin Texas. She was licensed as an architect in 1989, and as a registered LEED Green Building Professional by the US Green Building Council in 2009.

Since 2004 she has managed family-owned real estate holdings and has worked as an accounting professional specializing in issues involving real estate, estates, and trusts. From 1994 through 2004 she served as a Planning Commissioner in Colorado. Prior to that, as a partner in David Baker + Associates, she worked with developers to design, obtain entitlements for, and build thousands of affordable and market rate housing units in the Bay Area.