

From: [N Whitcombe](#)
To: [Coffin Butte Landfill Appeals](#)
Subject: LU 24 027 LANDFILL LIFE
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Attachments: [LANDFILL LIFE.pdf](#)

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Please see attached paper on LANDFILL LIFE

Thank you

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N J Whitcombe

WHITE PAPER ON DISPOSAL – EXPANSION DOES NOT MATERIALLY IMPACT LANDFILL LIFE

SUMMARY:

AN EXPANSION **ADDS ONLY TWO YEARS** (MAXIMUM) OF DISPOSAL FOR BENTON COUNTY COUNTIES OUTSIDE BENTON COUNTY WOULD ONLY HAVE TO DRIVE AN **IMMATERIAL ADDITIONAL DISTANCE** TO DISPOSE OF WASTE AT THE MILLERSBURG INTERMODAL STATION IF THAT IS THE REGIONAL SOLUTION THE GOVERNOR’S TASK FORCE RECOMMENDS

DETAIL, LANDFILL LIFE, BENTON COUNTY:

WITHOUT AN EXPANSION, REPUBLIC IS **CONTRACTUALLY OBLIGATED** TO DISPOSE OF BENTON COUNTY TRASH IN THE LANDFILL THROUGH **YEAR-END 2040**

Explanation: through year-end **2040**, Benton County has **contractually guaranteed trash capacity** at the landfill for Benton County garbage, per the Franchise Agreement.¹

WITH AN EXPANSION REPUBLIC ESTIMATES **LANDFILL REACHES CAPACITY @ YEAR-END 2042**

Explanation: the applicant states that the landfill will reach capacity by **year-end 2042**. This is derived by taking the capacity at year-end 2025 (11.4 years, from the most recent Coffin Butte Annual Report²) plus the six years the applicant asserts the expansion will provide.

SO FOR BENTON COUNTY, EXPANDING THE LANDFILL WOULD ADD ONLY **TWO YEARS MORE** OF CAPACITY, MAXIMUM, AN **IMMATERIAL AMOUNT**

DETAIL, LANDFILL LIFE, OTHER COUNTIES:

WITHOUT AN EXPANSION, OTHER COUNTIES WILL HAVE TO START TRANSPORTING WASTE FROM THEIR WASTE TRANSFER STATIONS TO ANOTHER LANDFILL OR AN INTERMODAL STATION STARTING AT THE EARLIEST IN 2036. THE MILLERSBURG INTERMODAL STATION IS CLOSER THAN COFFIN BUTTE ALONG MANY HAULER ROUTES, AND WOULD NOT RESULT IN MATERIAL INCREASES IN TRANSPORTATION COSTS.

WHEN WILL THE LANDFILL REALLY BE FULL? PROBABLY NOT UNTIL 2055-2065

IF THE LANDFILL OPERATOR **UNILATERALLY TAKES ACTION TO REDUCE VOLUMES**, (which is likely to happen as the appeal process winds down beginning in 5-6 years) THE LIFE OF THE LANDFILL WILL EXTEND TO **2055 AND BEYOND. THIS IS LIKELY TO HAPPEN.**

As landfills approach capacity, landfill operators unilaterally reduce intake volumes, resulting in extension of landfill life by decades. This is basic economics; the operator increases tipping fees to profit more from limited airspace, volumes decrease, and the end result is a significant extension in landfill life. This is what happens all over the country when landfills near capacity.

It is economically advantageous for the landfill operator because it puts off closure and post-closure expense, which is economically advantageous.

This is what happened at Riverbend; in 2008, when that expansion was submitted, the landfill operator projected end of life in the year 2014. When they stopped appealing the land use decision, volumes reduced, and the projected close is now 2032.

¹ “Franchisee shall accept for disposal at the Landfill, Solid Waste created...within Benton County” 2020 Franchise Agreement

² “At the end of 2023, we projected the landfill had 13.4 years of life remaining” 2023 Coffin Butte Annual Report