

From: [Mark Yeager](#)
To: [Benton Public Comment](#)
Subject: Inadequate Traffic Impact Analysis - LU-24-027
Date: Monday, April 28, 2025 7:48:55 AM
Attachments: [Traffic Impact Testimony.2.28.25.pdf](#)

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I am submitting the attached letter in opposition to the proposed development to expand Coffin Butte Landfill.

Sincerely

Mark Yeager

April 28, 2025

Chair Fowler and Members of the Commission

Subject: LU-24-027; Inadequate Traffic Impact Analysis (TIA)

After reading the staff report for this proposed development, including the April 17, 2025, letter from Kellar Engineering, and the April 9, 2025, memo from Benton County Public Works to Benton County Community Development, I am compelled to reiterate that the information and analysis presented in the February 26, 2024, Transight Consulting TIA is not adequate to allow for a reasonable evaluation of the impact of the proposed landfill expansion on the transportation system.

The primary deficiencies are discussed in detail in a letter submitted to you on April 21, 2025, and include:

- Site trip generation and system performance analysis is limited to use of the site's 2023 driveway movement volumes and does not consider the impact of rerouted internal trip generation.
- The TIA lacks an evaluation of whether there are any "in process" developments or changes to the County road or State highway system that could impact the study area.
- The method used by the TIA to estimate future site trip generation **inaccurately assumed that the proposed site expansion would not result in the potential for any increase in site trips beyond what could have otherwise occurred at the existing facility.**
- The analysis did not include the impact of **removal of the annual tonnage cap** on trip generation.
- The TIA's analysis of needed transportation system improvements is insufficient due to its being based solely on (underestimated) 2023 volumes.
- The analysis did not include the impact of **removal and transport of 3.5 million cubic yards** of material from the excavation for the new development.

In the absence of a revised TIA that accurately describes the proposed development's impact on the transportation system, we recommend denial of this application.

Respectfully submitted,

Mark Yeager, PE

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