



June 26, 2024

Commissioner Patti Adair  
Commissioner Phil Chang  
Commissioner Anthony DeBone

Board of County Commissioners  
Deschutes County  
117 NW Lafayette Avenue  
Bend, Oregon 97701

Dear Commissioners Adair, Chang and DeBone:

At your June 12, 2024, Board of County Commissioners meeting, you considered a draft order directing the County to pursue acquisition of the Moon Pit site for a future landfill and to develop and implement a robust and comprehensive mitigation strategy that reflects community values to minimize impacts to area wildlife and recreation.

As we described in our June 10, 2024, letter, siting a new landfill at Moon Pit will require a difficult land use and environmental permitting process. Our organizations reiterate, with further detail, what we hold to be satisfactory and comprehensive mitigation for constructing and operating a landfill at that location.

First, Deschutes County should secure, either through direct purchase or by partnering with a third party, a conservation property or conservation easement within or adjacent to the Brothers Priority Area for Conservation (PAC), **that is at least two times the size of the Moon Pit property** and which provides essential habitat for greater sage-grouse and other special status species identified in the Oregon Conservation Strategy. The Oregon Department of Fish and Wildlife recently expanded the size of the Brothers PAC based on new scientific evidence of its importance for conserving and recovering the grouse. Securing a parcel or conservation easement from a willing landowner, implementing appropriate conservation strategies for sage-grouse and other wildlife in the Brothers PAC, and monitoring the effectiveness of those conservation strategies can mitigate the landfill's wildlife impacts. We believe a host of partners will step forward to help administer and restore habitats on the new conservation property. We are also aware of federal and state funding available for securing sage-grouse habitat, including as part of mitigation programs.

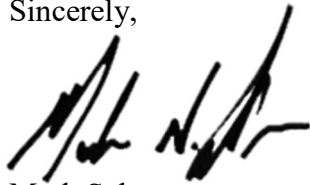
Second, Deschutes County should establish a dedicated mitigation fund to restore or enhance wildlife habitat and recreation on public lands in eastern Deschutes County, including but not limited to the Oregon Badlands Wilderness and Horse Ridge Recreation Area. The new fund

would be maintained by an independent third party and governed by an independent board established by the County and supported by a percentage of proceeds from refuse disposed of at the new landfill. The fund would be similar to other successful mitigation accounts established in the county that seek to balance development and resource use with conservation and provision of other values, contributing to a legacy of prescient planning and management in Deschutes County.

The consultant hired by the County to study landfill siting reported that “the initial cost of mitigation is estimated to be \$700,000 with \$800,000 in operations and maintenance” for development at the Moon Pit.<sup>1</sup> We believe these numbers to be woefully inadequate to mitigate for the impacts of developing and operating a landfill on wildlife, recreation and other values. A landfill at the Moon Pit site will irreversibly affect greater sage grouse, mule deer, elk, pronghorn, golden eagles and other wildlife. It will also degrade recreational use of the adjacent Oregon Badlands Wilderness and at the Horse Ridge Recreation Area, directly across Highway 20. **Mitigating for all of these impacts is likely to cost at least ten times the amount estimated in the consultant’s report**, which is based on required minimum measures rather than scientifically recommended and publicly preferred compensatory mitigation for development.

We look forward to working with the County to develop a more specific mitigation plan during the complex land use and environmental permitting processes that lie ahead.

Sincerely,



Mark Salvo  
Conservation Director  
Oregon Natural Desert Association



Ben Gordon  
Executive Director  
Central Oregon LandWatch

---

<sup>1</sup> Parametrix. Deschutes County Solid Waste Management Facility (SWMF) Final Site Evaluation at 4-23.