



# Oregon

Tina Kotek, Governor

Department of Fish and Wildlife

Wildlife Division

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15 August 2025

Deschutes County  
PO Box 6005  
Attn: Solid Waste  
Bend, OR 97708-6005

RE: Deschutes County Solid Waste Management Facility Siting, Deschutes County Department of Solid Waste

Dear Director Tim Brownell and Deschutes County Solid Waste Advisory Committee,

The Oregon Department of Fish and Wildlife (ODFW) appreciates the opportunity to provide the following comments and recommendations regarding the siting of Deschutes County's new solid waste facility. ODFW previously submitted comments to the Deschutes County Solid Waste Advisory Committee on June 16, 2025; this correspondence reiterates many of the same concerns for the two proposed finalist sites located north of Pine Mountain. It is the policy of the state of Oregon to manage wildlife to prevent serious depletion of any indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of Oregon (ORS 496.012). In accordance with our mission, ODFW offers the following comments and recommendations:

The decision to site the proposed solid waste facility at either the Roth East or Roth Northeast locations would have significant adverse impacts, both direct and indirect, on sagebrush obligate and sagebrush associated species in Deschutes County. ODFW's primary concerns are the direct and indirect adverse effects on the greater sage-grouse population in the area. The sage-grouse inhabiting Deschutes, Crook, and northern Lake County are unique in that they make up the Central Oregon sub-population of sage-grouse, which is genetically distinct from the larger Great Basin sage-grouse population (Oyler-McCance et al. 2022). The Roth East and Roth Northeast sites fall within low-density sage-grouse habitat and are directly adjacent to the Brothers Sage-grouse Priority Area for Conservation (PAC). It is important to note that two occupied sage-grouse leks (communal breeding areas) are located west of the Roth East and Roth Northeast sites, within low-density habitat, and represent the furthest westernmost active lek locations in Oregon. Siting the new solid waste facility at either the Roth East or Roth Northeast locations would effectively cut off Oregon's westernmost sage-grouse leks from the Brothers PAC, resulting in a direct impact which would be realized through an adverse effect of sage-grouse avoidance of the facility. Notably, both the Roth East and Roth Northeast sites are located within ODFW's designated Priority Wildlife Connectivity Areas (PWCAs), which represent areas on the landscape with the highest overall value for facilitating wildlife movement in Oregon (ODFW 2025).

Siting the new facility at either the Roth East or Roth Northeast sites would also have significant indirect adverse impacts on the sage-grouse population in Deschutes County. This includes increased traffic volumes and noise associated with the facility, which would result in avoidance by sage-grouse beyond the footprint of the facility. Additionally, the new solid waste facility will provide an abundant new food subsidy for corvids (e.g., common ravens, American crows, black-billed magpies), which will lead to artificially increased corvid populations in the area. Common ravens are a primary nest predator of sage-grouse, and research has shown negative impacts of elevated raven densities on sage-grouse nest survival, especially when raven densities exceed 0.4 ravens per sq. km (Coates et al. 2020). Preliminary results from research conducted by Rebecca Kelble, Oregon State University graduate student under the direction of Dr. Christian Hagen, indicate raven densities in the Brothers PAC (0.7 ravens/km<sup>2</sup> [95% CI: 0.4–1.1]) may already exceed the threshold where impacts to sage-grouse nest survival are realized (Kelble et al., 2024). However, the raven density estimate in the Brothers PAC is less than half that observed in the adjacent Paulina PAC (1.5 ravens/km<sup>2</sup> [95% CI: 0.9–2.5]; Kelble et al., 2024). These preliminary results indicate that sage-grouse nest survival in the Brothers PAC may not be as heavily impacted by raven predation, presently, as other regions of Oregon. This research has also found demographic rates (e.g., adult female survival, nest survival, and brood survival) of sage-grouse in the Brothers PAC were at or above the rangewide average during 2022–2024, where the same demographic rates in the Paulina PAC were below the rangewide average during 2022–2024. These results emphasize the importance of minimizing human subsidies, specifically food and nesting structures, within and adjacent to the Brothers PAC, which would artificially increase the raven population in this area and negatively impact nest survival of sage-grouse breeding within the Brothers PAC and adjacent low-density habitats.

ODFW's previously submitted comments, dated June 16, 2025, referenced OAR 660-023-0115, which identifies greater sage-grouse habitat as a significant Goal 5 resource (DLCD 2017). OAR 660-023-0115(7) identifies conflicting uses to greater sage-grouse habitat and requires compliance with the ODFW Greater sage-grouse Conservation Strategy for Oregon (OAR 635-140). Proposed development projects in significant sage-grouse habitat which require a county permit must coordinate with ODFW to ensure the mitigation hierarchy outlined in both OAR 660-023-0115 and OAR 635-140-0025 has been achieved.

OAR 660-023-0115(10) defines the mitigation hierarchy to protect significant sage-grouse habitat in a low-density area. A county may approve a large-scale development project that impacts a low-density area if the proponent has clearly demonstrated that reasonable alternatives have been considered and that the activity or other action cannot avoid impacts within a low-density area [OAR 660-023-0115(10)(A)]. If the proposed large-scale development can occur in another location that avoids both direct and indirect impacts within a low-density area, then the proposal must not be allowed unless it can satisfy the following criteria: **(i)** It is not technically or financially feasible to locate the proposed large-scale development outside of a low-density area based on accepted engineering practices, regulatory standards, proximity to necessary infrastructure or some combination thereof, or **(ii)** The proposed large-scale development is dependent on geographic or other physical feature(s) found in low-density

habitat areas that are less common at other locations, or it is a linear use that must cross significant sage-grouse habitat in order to achieve a reasonably direct route.

ODFW recommends further coordination with the Department of Land Conservation and Development (DLCD) and the County to ensure compliance with the mitigation hierarchy in OAR 660-023-0115(10)(A) and OAR 635-140-0025 to achieve the goal of protecting significant sage-grouse habitat. As ODFW understands it, there is not enough evidence that the mitigation hierarchy has been followed to achieve the goal of protecting significant sage-grouse habitat, as there are alternative locations to site the facility outside of low-density sage-grouse habitat. ODFW continues to recommend these alternative locations outside of significant sage-grouse habitat be evaluated to avoid direct and indirect impacts to low-density habitat, consistent with the mitigation hierarchy.

ODFW acknowledges the challenges in evaluating differing community values and priorities, and the need for careful and thoughtful land use decisions. ODFW appreciates the opportunity to comment on the solid waste facility siting process and looks forward to further coordination regarding the protection of greater sage-grouse and their habitat for present and future generations. Please contact me with any questions or how ODFW may assist in this process.

Thank you,



Bernadette Graham Hudson  
Wildlife Division Administrator  
Oregon Department of Fish and Wildlife

cc:

Sarah Reif, Habitat Division Administrator, ODFW  
Joy Lovett, Land Use and Waterway Alterations Coordinator, ODFW  
Sara Gregory, Deschutes Watershed District Manager, ODFW  
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Greg Jackle, Interim Sage-Grouse Mitigation Coordinator, ODFW  
Skyler Vold, Sage-Grouse Conservation Coordinator, ODFW  
Jon Jinnings, Community Services Specialist, DLCD

### Literature Cited

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