

**From:** [Rory Isbell](#)  
**To:** [managethefuture](#); [Board](#)  
**Cc:** [Mark Salvo](#); [Ben Gordon](#); [ecaudubon@gmail.com](mailto:ecaudubon@gmail.com); [Tim Brownell](#)  
**Subject:** Conservation coalition comments on Solid Waste Management Facility Location Proposal for BOCC 6/12/24  
**Date:** Monday, June 10, 2024 10:06:58 PM  
**Attachments:** [FINAL Coalition Letter, Deschutes BOCC Landfill Mitigation 6.10.24.pdf](#)

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[EXTERNAL EMAIL]

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Hello,

Please find attached joint comments from the Oregon Natural Desert Association, Central Oregon LandWatch, and East Cascade Audubon Society to the Board of County Commissioners regarding the Solid Waste Management Facility Location Proposal.

Regards,

Rory Isbell

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***Rory Isbell*** (*he/him*)  
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*On the ceded homelands of the Wasq'u (Wasco)  
and Tana'nma (Warm Springs) people*



June 10, 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:

The Board of County Commissioners is currently considering where to locate a future landfill for Deschutes County. Siting a new landfill will involve extensive land use approval processes, including possible comprehensive plan and zoning code amendments and specific application permits. A substantial issue in those land use processes will be impacts of developing and operating a landfill on wildlife and recreation.

The Solid Waste Advisory Committee (SWAC) has recommended that, if the County selects the Moon Pit site for a future landfill, it should adopt a robust mitigation program to compensate for unavoidable, permanent impacts on the environment and recreation. Wildlife conservation and outdoor recreation are of increasing value to both the people and economy of Deschutes County, and developing a landfill at the Moon Pit site will affect wildlife resources and the public's enjoyment of nearby public lands for generations.

If the Board selects Moon Pit, our organizations will be keenly interested in seeing what the County proposes for a mitigation and monitoring program. In line with the SWAC's recommendations, we assume such a program would entail two key components.

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), 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.

We look forward to working with you in your site selection process and the development of a robust and durable mitigation plan for whatever site is pursued.

Sincerely,

Mark Salvo, Conservation Director  
Oregon Natural Desert Association

Ben Gordon, Executive Director  
Central Oregon LandWatch

Duke Tufty, President  
East Cascades Audubon Society