

Appendix E

Development and Permitting Evaluation

DATE: January 29, 2024
TO: Deschutes County
FROM: Jen Hughes and Sabrina Robinson, Parametrix
SUBJECT: Moon Pit Site Development and Permitting Evaluation

The Site Development and Permitting task identifies and describes possible land use and permitting requirements for the potential Moon Pit site.

Site Introduction

The Moon Pit site is a 440-acre property located in Deschutes County at Township 19S, Range 14 E, Sections 1-2, 12, with tax lot number 1914000000200. The site is located approximately 16 miles southeast of Bend, Oregon. The site consists of flat to rolling terrain in the northern portion of the site and gradually rises to the central and southeastern portions of the site.

The northern portion of the site is adjacent to the Oregon Badlands Wilderness which provides hiking and horseback riding trails, including the Badlands Rock Trailhead, which is located approximately 700 feet from the site boundary.

Zoning and Land Use

Zoning

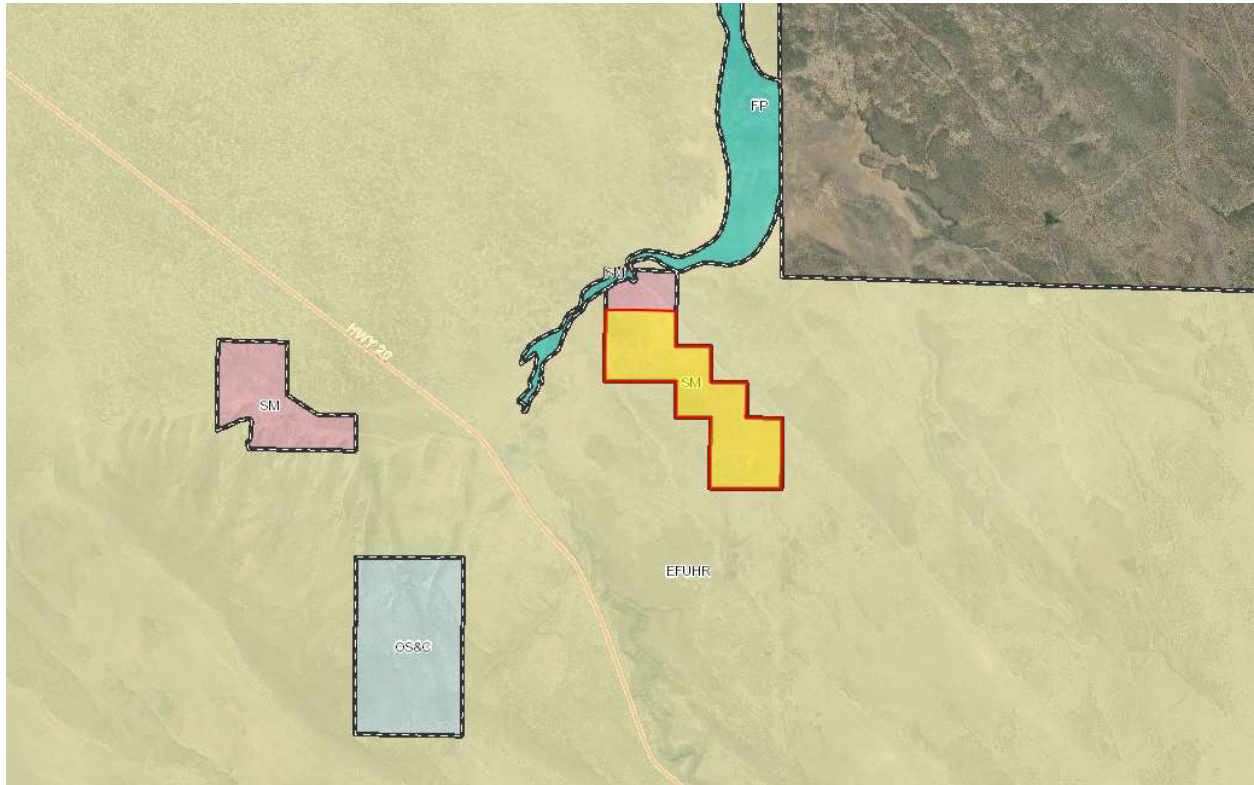
Current Zoning and Use

The Moon Pit site is zoned Surface Mining (SM) with a Wildlife Area Combining Zone (WA) overlay. Adjacent zoning includes Exclusive Farm Use - Horse Ridge (EFUHR), Flood Plain (FP) zone, Surface Mining Impact Area (SMIA) overlay, and Sage Grouse Habitat Area (General and Low-Density). Nearby zoning includes Open Space and Conservation (OS&C), Landscape Management Combining Zone (LM) overlay, and Wildlife Area Combining Zone (WA) overlay. There is an area of floodplain located north and northwest of the site.

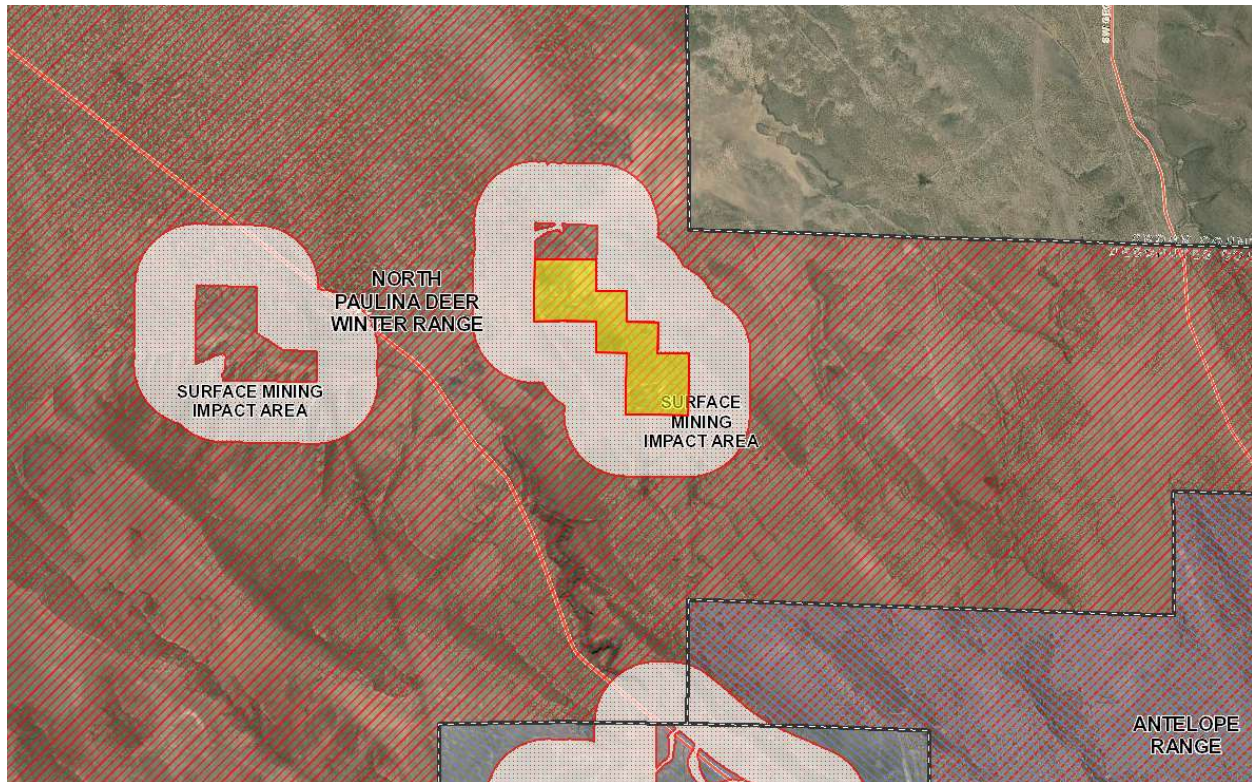
The existing use consists of an active surface mine. Land Disposal Sites are listed as a conditional use in the SM zone (Deschutes County Code [DCC] 18.52.050), with the requirement that a "valid DEQ permit on the effective date of Ordinance No. 92-066 for a Land Disposal Site," exists for the use. This means that only DEQ permitted landfills in place prior to the 1992 Ordinance are allowed as conditional uses in the SM zone. As there is currently no landfill in operation at the site, land disposal is not a permitted use in the current zone.



Base Zones



Overlays



Land Use Approval Process

Because land disposal sites are not allowed in the SM zone, strategies for the approval of the potential use of this site were explored. Three potential land use approval pathways were identified that could provide the necessary zoning changes that would allow landfill operations on the Moon Pit site. Continued coordination with Deschutes County is recommended to help identify the best land use process approach. The three options are discussed below.

(1) Requesting a zone map amendment to change the base zoning from Surface Mining (SM) to Multiple Use Agriculture 10-Acre Minimum (MUA10).

A zone map amendment request is a quasi-judicial review procedure. The applicant would need to demonstrate how the request meets the standards outlined within Amendments in DCC 18.136.020. Standards include proving that the proposed change in zoning is consistent with the Comprehensive Plan and that it serves the public health, safety, and welfare considering the availability and efficiency of providing necessary public services and facilities and that impacts on surrounding land use will be consistent with the specific goals and policies contained within the Comprehensive Plan. Applicants must also demonstrate that there has been a change in circumstances since the property was last zoned, and that the proposed change is consistent with the Oregon Transportation Planning Rule.

Additionally, because the SM zone is applied to a Goal 5 protected resources, approval would require demonstration that the protected mineral resource in the SM zone has been exhausted. The protected mineral resource is identified in the Deschutes County Comprehensive Plan as

193,000 cubic yards of aggregate meeting Oregon Department of Transportation specifications. The mining operation would not be allowed in the MUA10 zone, so would have to cease once the new zoning was adopted. Subsequently, it would likely be required that the application request removal of the Surface Mining Impact combining zone that surrounds the site. Finally, it is possible the County would need to add a new combining zone to apply over the site to limit uses to landfilling, which would be subject to the same requirements as the zone map amendment.

(2) Proposing a text amendment to the Comprehensive Plan to allow landfill use as an approved reclamation action to use on a site after mining is complete.

A text amendment to the Comprehensive Plan for a single property would be processed as a quasi-judicial procedure subject to DCC Title 22. The specific language of the text amendment would need to be coordinated with the Oregon Department of Geology and Mineral Industries (DOGAMI) to ensure the parameters of the text accurately describe land disposal as an approved reclamation activity within an approved reclamation plan for the site. This review is first reviewed before a hearings officer, allowing an opportunity for vetting before being presented to and reviewed by the Board of County Commissioners. This option would maintain the SM zone and SMIA overlay zone. Maintaining the SMIA combining zone could protect the site from complaints related to landfill operations that would also be common to mining operations. This option requires coordination with DOGAMI and the Department of Land Conservation and Development.

(3) Proposing a new landfill overlay zone for the site that would allow land disposal sites on lands designated with the overlay zone.

Creating a landfill overlay zone requires a map and text amendment to the DCC. This option would still retain the SM zone, which would then be supplemented by the landfill overlay and its specific provisions. This option would most likely require updating the ESEE (economic, social, environmental, and energy) analysis for the new site use of landfill. The landfill overlay would be a legislative review procedure in DCC 22.12. However, during discussions with the County Planning Department, the County noted that overlay zones in Deschutes County are typically used to further limit uses or provide more restrictive development standards, not to add allowed uses and less restrictive standards, thus a landfill overlay zone such as that contemplated in this section would be unusual, and potentially not approvable. In addition, County staff noted that creating a landfill overlay if it were acceptable, should have occurred before the landfill siting process not in response to it (Personal Communication, November 13, 2023).

Natural and Adjacency Hazards

Flood

The Moon Pit site is not directly located within any mapped surface water or groundwater flood hazard areas. However, the northern portion of the site contains flat terrain located near the 100-year floodplain. Because no base flood elevation has been established by FEMA, it is difficult to project potential flood risk onto the site topography without detailed hydraulic analysis. In addition, climate change may likely increase flood frequencies and extents. Therefore, river flooding presents flood risk to the northern part of the Moon Pit site, although there is not sufficient data to estimate the extents without further hydraulic analysis.

There are intermittent or ephemeral stream channels with relatively high slope contributing basins at the Moon Pit Site which has the potential for flash floods or spring to early-summer rain-on-snow events that could lead to localized flooding.

Please refer to the Flood Risk Desktop Assessment for more information.

Earthquake

Faults are likely inactive within the last 12,000 years. Please see the Geotechnical Investigation and Geology/Hydrology reports for more information.

Wildfire

The site is located in a wildfire hazard area (as is the entirety of Deschutes County). DCC 15.04.085(B) implements provisions for R327 Roofing Section of the Oregon Residential Specialty Code enforced pursuant to DCC 15.04.010(A).

Surrounding Resources

Natural/Ecological Resources

The site would require employing best management practices to avoid impacts to Migratory Bird Treaty Act protected species and to mitigate for impacts to mule deer winter range, essential and limited pronghorn habitat, and significant sage-grouse habitat. Please refer to the Natural Resource Assessment report for more information.

Archaeological/Cultural Resources

Willamette Cultural Resources Associates (CRA) completed the background research and reconnaissance survey of the Moon Pit site project area and found five previously recorded archaeological resources within the project area. The National Register of Historic Places Eligible archaeological site 35DS2834 is located immediately adjacent to the north of the project area. Three archaeological sites and two isolates were identified within the project area during the reconnaissance survey. Willamette CRA recommends that the portions of the site that have not been directly impacted by ground-disturbing mine/quarry activity have a high probability of containing archaeological resources and should the site be chosen for the landfill, a formal systematic archaeological survey and delineated reconnaissance survey should be conducted. Please refer to the Archaeological Reconnaissance Survey for the Deschutes County Landfill Project, Moon Pit Property Report for more information.

Historical Resources/Landmarks

Extant buildings and structures within the parcel do not date to the historic period, and there are no historic built environment resources within or in the immediate vicinity of the Moon Pit project area.

Noise Considerations

Existing sensitive noise receptors in the project vicinity are related to recreational uses including the Oregon Badlands Wilderness to the north and northwest, Dry River Gorge to the west, Horse Ridge Research Natural Area to the west across US Route 20, and associated trailheads for these recreational areas. Specifically, Badlands Rock Trailhead is situated within a quarter mile of the main entrance to the existing quarry. Wildlife in the vicinity, such as mule deer and birds of prey, could also be affected by the noise generated at this location.

Construction noise would cause a direct impact to noise levels at the proposed landfill site. The most prevalent noise sources would likely be equipment powered by internal combustion engines (usually diesel) and blasting associated with landfill cell excavation.

Operational noise is anticipated to be very similar to current quarry operations, using dump trucks, bulldozers, and front-end loaders. Blasting would only occur during additional future construction of either cell expansion or new cell construction; operational blasting is not anticipated. Depending on the type of landfill gas collection and venting/flaring system selected, there could be a continuous background noise level associated with the operation of this function. Operational noise variances are not anticipated given the normal daytime business working hours.

Encumbrances

Easements/Entitlements

The following relevant encumbrances or easements are listed in the title report for the property:

- An easement granting use of a livestock water pipeline and existing service road by the United States of America, its licensees and permittees.
- An easement granting placer claim for a mining location at Dry River Mine #1.
- A condition of approval agreement for land use permits SP-95-91 and CU-95-86.

Please see the Title Report for more information.

Permitting

Potential Permits

County Land Use Permitting

Depending on the zoning strategy chosen for the site, one or more County land use approvals or permits would be required as follows:

- Conditional Use Permit and narrative addressing applicable standards and criteria.
- Site Plan Review and narrative addressing applicable standards and criteria.

The Deschutes County Fee Schedule provides fees for applicable permits. This report does not provide the estimated fees because the schedule changes yearly and the fees required depend on the chosen permitting route and the year the permits are applied for.

NEPA

The Moon Pit site's existing access road crosses land owned by the Bureau of Land Management (BLM) and is managed by BLM (BLM Road 6521). BLM indicated that granting the County access rights could constitute a new right-of-way (ROW) easement which would be subject to the National Environmental Policy Act (NEPA) because BLM would be issuing a permit/making a decision.

BLM indicated the potential impacts to the adjacent wilderness area at the Oregon Badlands Wilderness and Dry River Canyon, east of the site from both a natural resource wilderness perspective and recreation perspective would likely mean that the project would not qualify for a Categorical Exclusion. An Environmental Assessment would be prepared if it is deemed unlikely that a proposed action would have a significant effect on the environment. If the proposed action would have a significant effect on the environment, an Environmental Impact Statement (EIS) would be required.

An EIS analyzes the environmental impacts and ways to mitigate them. The EIS process has more procedural requirements and therefore takes more time to prepare and offers more opportunities for public comment or involvement than an Environmental Assessment. An EIS can take multiple years to complete (3-5 years). Both an EIS and Environmental Assessment can be challenged in court.

Oregon DEQ Solid Waste Disposal Permit

Oregon Revised Statutes 459 requires that a solid waste facility apply to the Department of Environmental Quality (DEQ) for a Solid Waste Disposal Permit prior to starting operation. Anyone applying for a DEQ Solid Waste Disposal Permit should contact the Solid Waste Program for an Initial Site Evaluation. The evaluation process will allow the Department to discuss with the applicant what types of plans should be submitted and what conditions must be met for the type of facility.

The following documentation and information must be included with the permit application in order for the application to be complete:

- A Land Use Compatibility Statement
- A recommendation from the local solid waste planning authority
- Demonstration of the need for a new, modified or expanded facility
- A Certificate of Business Registry
- Identifying any other known or anticipated permits
- Application fee and compliance fees (if required)
- Any other information DEQ deems necessary

Landfills and some other facilities may also have to include the following documentation in order for the application to be complete:

- A Site Characterization Report
- Detailed plans and specifications
- For land disposal sites
 - A written closure plan
 - Evidence of financial assurance

DOGAMI Permits

It's possible that only a DOGAMI Transfer of Surface Mining Permit is required. However, if this permit process is not applicable to the site, then an Operating Permit may be required. Unless the County is mining aggregate for off-site export and use, mining operations related to landfill development and operations are not considered surface mining operations under DOGAMI and are covered under DEQ's permitting process (see ORS 517.750(16)(b)(F)).

An Operating Permit is required for material extraction activity that exceeds one acre of disturbance in any 12-month period and/or 5,000 cubic yards of excavation in any 12-month period. When total disturbance exceeds five acres, an Operating Permit is required unless the activity is exempt. Note that annual Operating Permit renewal and reporting are required until mining and reclamation are complete. Additionally, the renewal fee is calculated based on production, plus a base fee.

Minimum Operating Permit Application requirements include:

- Application Fee
- Operating Permit Application Form
- Proof of Land Ownership (trio)
- Permit Boundary Survey Map

- Site Plan Map
- Reclamation Plan Map
- Applicable Supplemental Forms and Fees*

Air Quality

Oregon DEQ requires monitoring point sources and diffuse area-wide sources for potential air contaminants including methane, odorous compounds, particulates, and volatile gas compounds. The vicinity of the Site is predominantly vacant, undeveloped land. There are no industrial or power-generating plants within a 3-mile radius that would contribute to areawide air quality conditions.

An Oregon Title V Air Quality Operating Permit will also be required. This Permit Program is for major industrial sources of air pollution and places a greater responsibility on the facility for monitoring, reporting, and certifying compliance with the conditions of the permit. Under this Permit Program, the facility has to report on compliance with conditions of its permit at least every six months.

Permit Application requirements include:

- Obtaining an Air Contaminant Discharge Permit initially to construct the landfill facility
- Title V Permit application is due one year after the initial startup of the source
- Title V Permit Application Forms:
 - General Information (Series AP100)
 - Devices and Processes (Series DV200)
 - Control Device (Series CD300)
 - Applicable Requirements (Series AR400)
 - Emissions Units (EU500)
 - Emissions Data (Series ED600)
 - Monitoring (Series CP700)
 - Miscellaneous (Series MF800)
- Annual Fees including base fee and emissions fee

Please refer to the Air Quality report for more information.

Natural Resources

The following natural resource permits or compliance approvals would be required:

- Eagle Incidental Take Permit
- ODFW's Wildlife Habitat Mitigation Policy (OAR 635-415-0000)
- Sage Grouse (DCC 18.89.060)
- Wildlife Area Combining Zone (DCC 18.88.030)

Potential Risks

Potential risks may arise from the necessary site zone change to allow the landfill use. A potentially lengthy NEPA process is an additional risk if required.

Concerns from stakeholders include traffic and shared access safety and disruption to habitat and wildlife.

Early Engagement

County Planning Engagement

Correspondence

An initial meeting was held with Peter Gutowsky and Will Groves from the County Planning Department on November 13, 2023, to discuss possible routes for a zone change and feasibility.

Contact Information

Contact	Email	Phone
Peter Gutowsky (Community Development Director)	Peter.Gutowsky@deschutes.org	(541) 385-1709
Will Groves (Planning Manager)	william.groves@deschutes.org	(541) 388-6518

Oregon DEQ Engagement

Correspondence

Greg Svelund with Oregon DEQ has been involved in the process thus far. Greg participated in June 2023 and August 2023 project meetings. Future correspondence with DEQ is anticipated as the project progresses.

Contact Information

Contact	Email	Phone
Greg Svelund (Regional Solutions for Eastern/Central and South Central Region)	Svelund.Greg@deq.state.or.us	(541) 633-2008

Stakeholders

Stakeholders for the Moon Pit site include:

- BLM – Oregon Badlands Wilderness
- Recreation Users, including hikers and bikers
- US Fish and Wildlife and Oregon Fish and Wildlife
- Additional environment, wildlife, and other interests



DATE: January 29, 2024
TO: Deschutes County
FROM: Jen Hughes and Sabrina Robinson, Parametrix
SUBJECT: Roth East Site Development and Permitting Evaluation

The Site Development and Permitting task identifies and describes possible land use and permitting requirements for the potential Roth East site.

Site Introduction

The Roth East site is located in Deschutes County approximately 24 miles southeast of Bend at Township 20S, Range 15E, Sections 1, 11, 12, 13, 14. The Taxlot number is 2015000000301, and the site is approximately 1,700 acres. The site consists of flat to rolling terrain that gradually rises to the southern portions of the site.

The northeastern portion of the site is adjacent to a rural residential property that includes a residence and farm outbuildings.

Off-highway vehicle (OHV) trails associated with the Millican Valley OHV Trail System are located to the north and west of the site.

Bureau of Land Management (BLM) managed land is located adjacent to the southern portion of the property. Pine Mountain, a well-known paragliding launch area and the site of the Pine Mountain Observatory (an astronomical observatory owned and operated by the University of Oregon Department of Physics) is located within the Deschutes National Forest (managed by the United States Forest Service) to the south of the site.

Zoning and Land Use

Zoning

Current Zoning and Use

The Roth East property is zoned Exclusive Farm Use – Horse Ridge Subzone (EFUHR) with the overlays of Landscape Management – Combining Zone (LM), Sage Grouse Habitat Area – Low Density (SGHA-LOW), Surface Mining Impact Area (SMIA), Wildlife Area Combining Zone (WA). The SMIA overlay only covers a small area in the northernmost portion of the lot.

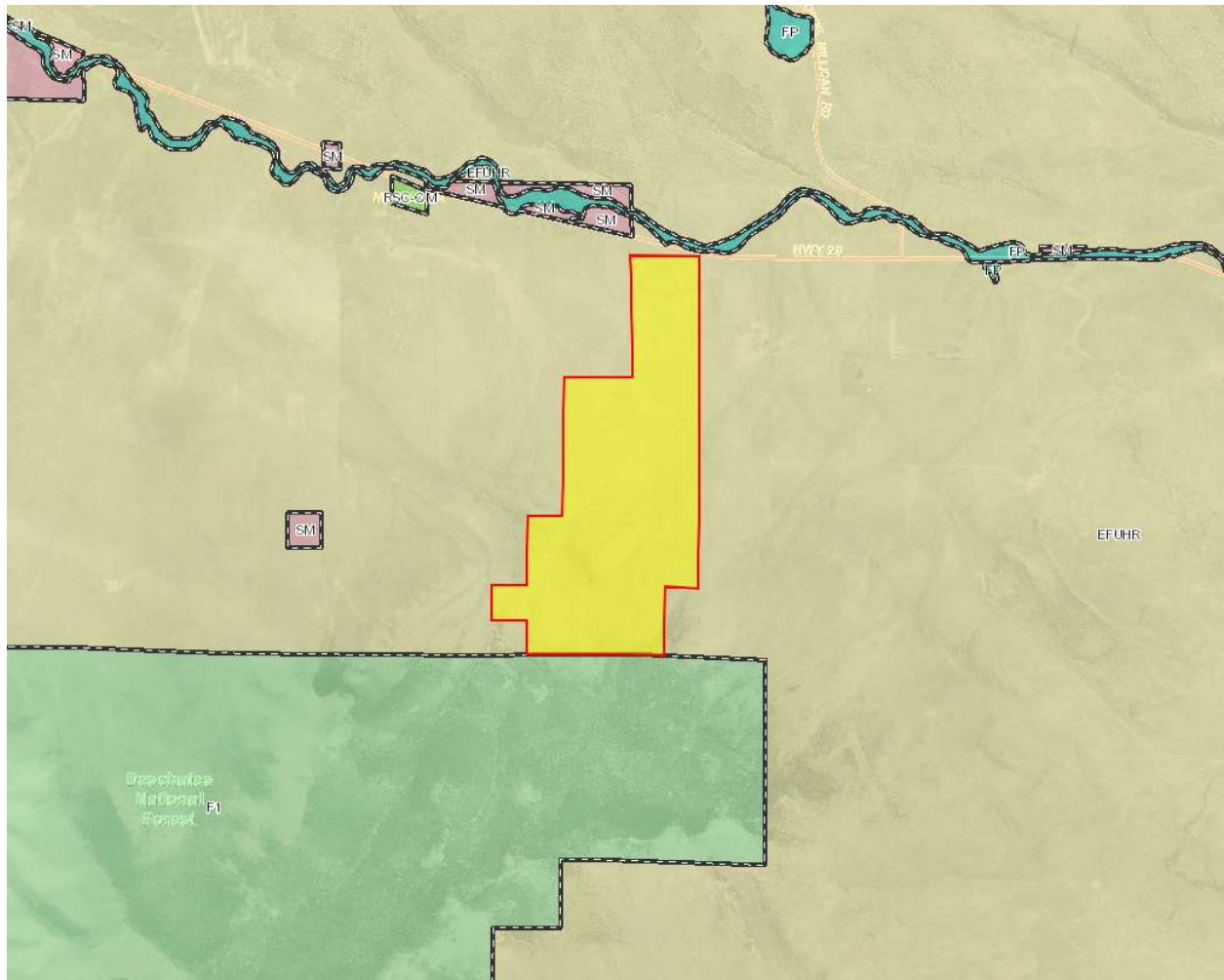
Surrounding zoning includes EFUHR, Surface Mining (SM), and F1.

The existing use is rural undeveloped land that is used for grazing.

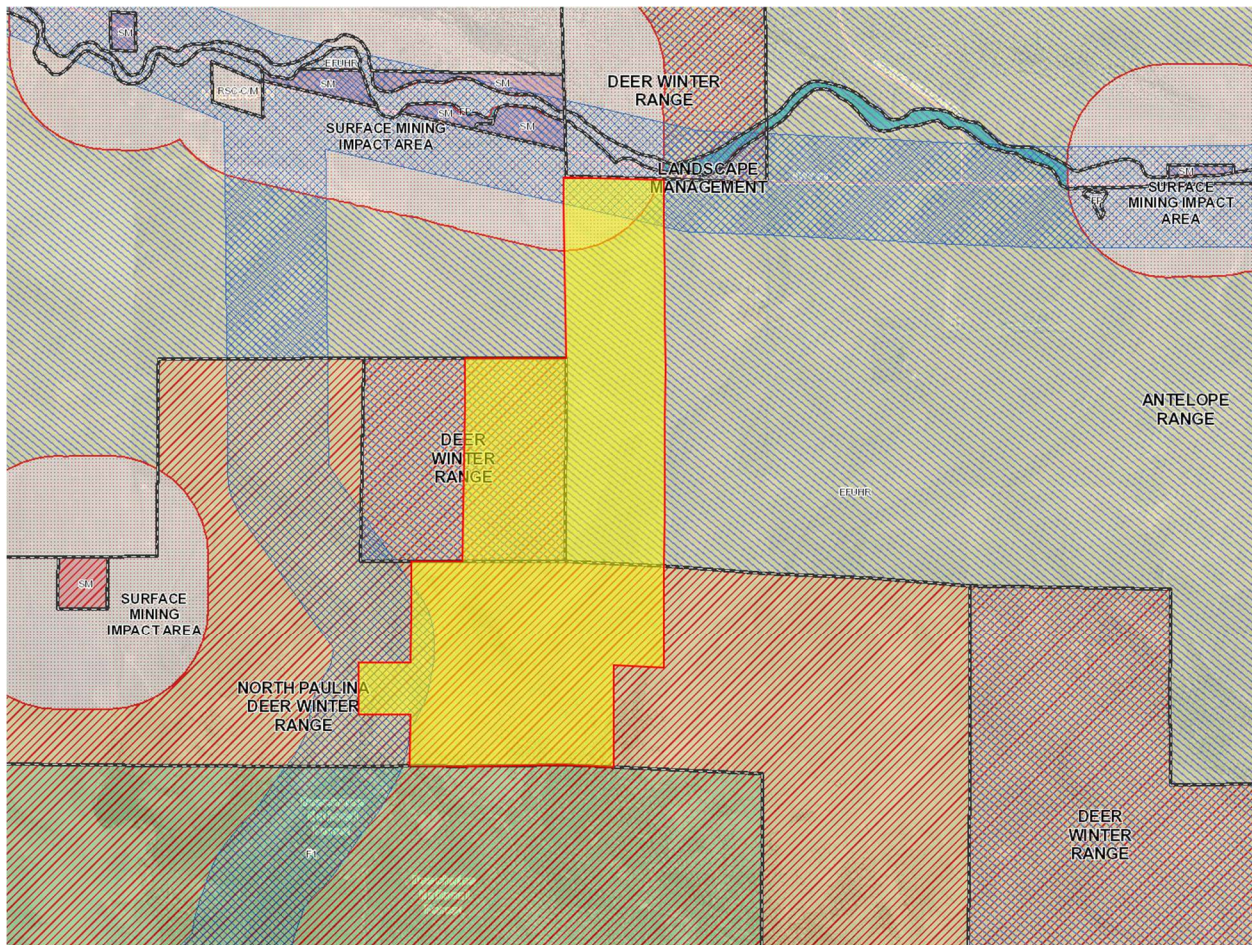
Land Disposal Sites are listed as a conditional use on non-high value farmland zoned Exclusive Farm Use (EFU; DCC 18.16.031). The site is designated as containing farmland of statewide importance only, which corresponds to soil types identified as non-high value farmland, therefore land disposal is a conditional use on this site.



Base Zones



Overlays



Land Use Approval Process

A conditional use review would be required to approve a landfill operation at this site in compliance with Deschutes County Code (DCC) Chapter 18.128 Conditional Use, and specifically with DCC 18.128.015 General Standards. These standards require the applicant to demonstrate that there is adequate transportation access to the site and that the natural and physical features of the site are considered suitable. These standards also require the applicant to demonstrate that the use will be compatible with existing and projected surrounding uses.

The standards for Disposal Sites as conditional uses found at DCC 18.128.120 Disposal Site would also apply. These standards were used as part of the screening criteria to identify and evaluate potential new landfill sites.

Additionally, because the site is within an EFU zone, DCC 18.16.040 requires that conditional uses must meet the requirements of what is known as a Farm Impacts Test, described in Oregon Revised Statutes (ORS) 215.296(1) and included in the DCC at 18.16.040.A. as follows:

“...the proposed use:

1. Will not force a significant change in accepted farm or forest practices as defined in ORS 215.203(2)(c) on surrounding lands devoted to farm or forest uses; and

2. Will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use; and
3. That the actual site on which the use is to be located is the least suitable for the production of farm crops or livestock.”

The Conditional Use Review is a Land Use Action subject to process requirements in DCC 22.20. and requires a pre-application conference. Though not required, it is likely this type of application would include a public hearing and decision by a hearings officer. Continued coordination with Deschutes County is recommended.

Natural and Adjacency Hazards

Flood

The Roth East site is not directly located within any mapped surface water or groundwater flood hazard areas; therefore, no primary risks to structures and utilities from river flooding are expected.

There are intermittent or ephemeral stream channels with relatively high slope contributing basins at the Roth East Site which has the potential for flash floods or spring to early-summer rain-on-snow events that could lead to localized flooding.

Please refer to the Flood Risk Desktop Assessment for more information.

Earthquake

Faults are likely inactive within the last 12,000 years. Please see the Geotechnical Investigation and Geology/Hydrology reports for more information.

Wildfire

The site is located in a wildfire hazard area (as is the entirety of Deschutes County). Deschutes County code 15.04.085(B) implements provisions for R327 Roofing Section of the Oregon Residential Specialty Code enforced pursuant to DCC 15.04.010(A).

Surrounding Resources

Natural/Ecological Resources

The site consists of a sage brush steppe environment with native and non-native bunch grasses. No waters of the United States or of Oregon State were determined to be on site. The development of the SWMF at the Site would require employing best management practices to avoid impacts to the Migratory Bird Treaty Act (MBTA) protected species and to mitigate for impacts to mule deer winter range, essential and limited pronghorn habitat, and significant sage-grouse habitat. Please refer to the Natural Resources report for more information.

Archaeological/Cultural Resources

Willamette Cultural Resources (CRA) completed the background research and reconnaissance survey of the Roth East site project area and identified six new archaeological isolates and six new archaeological sites within the project area. The majority of resources consist of precontact lithic material. The project area has not been subject to previous archaeological survey and past disturbances appear to be limited. Willamette CRA recommends that the entire parcel has a high probability of containing archaeological resources and should the site be chosen, a formal systematic archaeological survey and delineated reconnaissance survey should be conducted.

Please refer to the Archaeological Reconnaissance Survey for the Deschutes County Landfill Project, Roth Property Report for more information.

Historical Resources/Landmarks

There are no historic built environment resources in the Roth project area.

Noise Considerations

Existing sensitive noise receptors in the project vicinity are two residences located within 1 mile of the site. Further, users of the paragliding area, approximately 1.5 miles to the southwest, may also be affected by the noise. The nearby wildlife, which may consist of mule deer, antelope, sage grouse, and birds of prey, could also be affected by the noise generated at this location.

Construction noise would cause a direct impact to noise levels at the proposed landfill site. The most prevalent noise sources would likely be equipment powered by internal combustion engines (usually diesel).

Operational noise is anticipated to be very similar to current Knott Landfill operations, using dump trucks, bulldozers, and front-end loaders. Depending on the type of landfill gas collection and venting/flaring system selected, there could be a continuous background noise level associated with the operation of this function.

Encumbrances

Easements/Entitlements

The following relevant encumbrances or easements are listed in the title report for the property:

- An easement granting public right of way.
- An easement granting mineral rights for a portion of the site to the United States of America.
- Several easements for electrical transmission lines.
- A powerline easement.

Please see the Title Report for more information.

Permitting

Potential Permits

County Land Use Permitting

One or more County land use approvals or permits would be required for the EFU zoned site as follows:

- Conditional Use Permit and narrative addressing applicable standards and criteria.
- Site Plan Review and narrative addressing applicable standards and criteria.

A Landscape Management Review is required when construction requires a building permit within a specified distance of the designated road. Either a Visible (proposed building is visible from designated road), or Non-Visible (proposed building cannot be seen from the designated road or is completely hidden by vegetation or topography) application may need to be completed addressing applicable standards.

The Deschutes County Fee Schedule provides fees for applicable permits. This report does not provide the estimated fees because the schedule changes yearly and the fees required depend on the chosen permitting route and the year the permits are applied for.

Natural Resources

The following natural resource permits or compliance approvals would be required:

- ODFW's Wildlife Habitat Mitigation Policy (OAR 635-415-0000)
- Wildlife Area Combining Zone (DCC 18.88.030)
- Sage Grouse Area Combining Zone (DCC 18.89.060)
- Sage Grouse (OAR 635-140-0000)

Oregon DEQ Solid Waste Disposal Permit

Oregon Revised Statutes 459 requires that a solid waste facility apply to the Department of Environmental Quality for a Solid Waste Disposal Permit prior to starting operation. Anyone applying for a DEQ Solid Waste Disposal Permit should contact the Solid Waste Program for an Initial Site Evaluation. The evaluation process will allow the Department to discuss with the applicant what types of plans should be submitted and what conditions must be met for the type of facility.

The following documentation and information must be included with the permit application in order for the application to be complete:

- A Land Use Compatibility Statement
- A recommendation from the local solid waste planning authority
- Demonstration of the need for a new, modified or expanded facility
- A Certificate of Business Registry
- Identifying any other known or anticipated permits
- Application fee and compliance fees (if required)
- A Site Characterization Report
- Detailed plans and specifications
- A written closure plan
- Evidence of financial assurance
- Any other information DEQ deems necessary

Air Quality

Oregon DEQ requires monitoring point sources and diffuse area-wide sources for potential air contaminants including methane, odorous compounds, particulates, and volatile gas compounds. The vicinity of the Site is predominantly vacant, with a handful of rural residential properties located

throughout the area. There are no industrial or power-generating plants within a 3-mile radius that would contribute to areawide air quality conditions.

An Oregon Title V Air Quality Operating Permit will also be required. This Permit Program is for major industrial sources of air pollution and places a greater responsibility on the facility for monitoring, reporting, and certifying compliance with the conditions of the permit. Under this Permit Program, the facility has to report on compliance with conditions of its permit at least every six months.

Permit Application requirements include:

- Obtaining an Air Contaminant Discharge Permit initially to construct the landfill facility
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 - Emissions Units (EU500)
 - Emissions Data (Series ED600)
 - Monitoring (Series CP700)
 - Miscellaneous (Series MF800)
- Annual Fees including base fee and emissions fee

Please refer to the Air Quality report for more information.

Potential Risks

Potential risk comes from the Farm Impacts Test which could lead to LUBA appeals which can be a lengthy process.

Concerns from stakeholders include groundwater contamination, potential cultural artifacts/sites, disruption to habitat and wildlife, and issues with dust, litter and odor.

Early Engagement

County Planning Engagement

Correspondence

An initial meeting was held with Peter Gutowsky and Will Groves from the County Planning Department on November 13, 2023, to discuss permitting routes and feasibility.

Contact Information

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Oregon DEQ Engagement

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Contact Information

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Greg Svelund (Regional Solutions for Eastern/Central and South Central Region)	Svelund.Greg@deq.state.or.us	(541) 633-2008

Stakeholders

Stakeholders for the Roth East site include:

- Millican Valley residents
- Pine Mountain Observatory, University of Oregon Department of Physics
- Recreation users, especially paragliders, bikers, hikers and OHV
- BLM
- USFS – Deschutes National Forest
- US Fish and Wildlife and Oregon Fish and Wildlife
- Additional environment, wildlife, and other interests