

# **Appendix A**

## Site Comparison Summary Table

Category	Moon Pit	Roth East
<b>Conceptual Facility Layouts</b>	The Moon Pit site layout is more complex and less efficient, compared to Roth East. As a result, the ratio of capacity-to-acreage ratio is lower and more leachate pump stations are needed. Approximately 64,000,000 cy airspace is available within a 346-acre footprint and the estimated lifespan is 100 years. The existing access road, gate, scales, and well could help reduce site development costs to some extent. Mined areas provide some "free" airspace and help reduce initial excavation needs. Although the prevalence of shallow bedrock at this site increases excavation costs, the potential for synergistic aggregate mining operations presents an opportunity to further subsidize cell excavation costs.	The Roth East site has a more efficient square shape, which results in a better capacity-to-acreage ratio and requires fewer leachate sumps/pumps. As an undeveloped grazing property, there is no existing infrastructure available onsite for landfill operations. The mix of sand, gravel, and cobbles within the excavation depth onsite is very favorable for efficient landfill development and operation. Approximately 80,000,000 cy of airspace is available within a 387-acre footprint. The estimated lifespan of the preliminary design is approximately 113 years, but the lifespan could potentially be extended with horizontal and/or vertical expansion if needed.
<b>Site Development and Permitting Assessment</b>	Moon Pit is an active surface mine zoned for Surface Mining (SM) with Wildlife Area (WA) and Surface Mining Impact Area (SMIA) overlays. The site is in proximity to the Oregon Badlands Wilderness and public lands. To permit landfill use, three options are considered: (1) Changing base zoning from SM to Multiple Use Agriculture (MUA); (2) Amending the Comprehensive Plan to allow landfill use after mining; (3) Introducing a new landfill overlay zone for designated areas. Conversations with BLM suggest potential NEPA review due to the site's access road crossing BLM land, requiring a new ROW easement. Risks may emerge from the land use approval process and a potentially extended NEPA process if mandated.	The Roth East Site is currently rural undeveloped land used for grazing purposes and is surrounded by rural residential properties, OHV trails, and the Deschutes National Forest. The Pine Mountain Observatory is located approximately 4.4 miles southwest of the site. The site is zoned Exclusive Farm Use Horse Ridge (EFUHR) with overlays for Forest Use (F1), Landscape Management (LM), Sage Grouse Habitat Area – Low Density (SGIA-LOW), Surface Mining Impact Area (SMIA), and Wildlife Area Combining Zone (WA). A new landfill use is a conditional use under EFU zoning and would require a Farm Impact Test. Potential risks may arise from the Farm Impacts Test which could lead to a Land Use Board of Appeals (LUBA) appeal which can be a lengthy process.
<b>Transportation System Assessment</b>	The Moon Pit site has an existing and useful transportation network that provides direct access from US 20. The existing road between the site and US 20 is currently used by heavy vehicles, which is a benefit to a future landfill use and would likely reduce any upfront capital expenditures necessary for transportation access to the site. However, the access road is bound by BLM lands which means that any change of use or expansion of the road, if necessary, would be subject to BLM review which would likely be timely and costly. In addition, the road serves as a shared access to the Badlands Wilderness area which may create the perception of a conflict between a landfill and the recreation area.	The Roth East site has no existing improved access road between the site and US 20. As a result, the primary transportation need for this location would be to construct an access road, which would result in more upfront capital expenditures for access compared to the Moon Pit site. Multiple routes could be considered with trade-offs in regard to overall route length, connection point with US 20, avoidance of BLM land, and limiting the overall grade along the route. However, several route options would result in direct and unshared access to the site, which would limit any conflict between the landfill and adjacent uses.
<b>Water Infrastructure Assessment</b>	As both sites are within the Deschutes Groundwater Study Area, the timeframe for securing and mitigating for new water rights permits may extend beyond 2029. The Moon Pit site has existing industrial wells onsite with water rights. Although transfer the water rights is not offered with the property acquisition, the seller is willing to lease a partial water right to the County for landfill operational needs at a reasonable cost until the County can secure its own water rights. The current wells produce enough water to meet estimated operational water demands. The estimated costs for water rights permitting and water system upgrades at the Moon Pit site are approximately \$665,000.	As both sites are within the Deschutes Groundwater Study Area, the timeframe for securing and mitigating for new water rights permits may extend beyond 2029. The existing well on the Roth East site does not have water rights and is thus limited to the exempt well production rate of 5,000 gallons per day. Until water rights can be secured, it is assumed that water trucks from Knott Landfill would be needed to meet elevated water demands in March-October. It may be possible to purchase and transfer water rights from an existing water rights holder in the vicinity. The estimated costs for water rights permitting and water system upgrades at the Roth East site are approximately \$1,090,000.
<b>Electrical Power Supply Review</b>	The Moon Pit site will require approximately 9.5 miles of overhead utility line upgrades from the closest three-phase power connection point, near the intersection of Highway 20 and Dodds Rd. Roughly 2.6 miles will consist of upgrading an existing single-phase pole line. New three-phase power lines will need to be extended (overhead or underground) an additional 7 miles to the landfill location, mostly along Highway 20. Easements may be required through BLM property. Discussions with Central Electric Cooperative (CEC) approximated the cost of this upgrade at roughly \$2,000,000 with a 50-60 week lead time for material acquisition.	The Roth East site will require approximately 2.3 miles of overhead utility line upgrades from the closest three-phase power connection point, near the intersection of Highway 20 and George Millican Rd. Roughly 1.2 miles will consist of upgrading an existing single-phase overhead line. New three-phase power lines will need to be extended (overhead or underground) an additional 1.1 miles to the landfill location. Easements may be required through private property. Discussions with CEC approximated the cost of this upgrade at roughly \$700,000 with a 50-60 week lead time for material acquisition.
<b>Flood Risk Desktop Review</b>	Moon Pit site is not directly within mapped flood hazard areas, but the northern part of the site is near the 100-year floodplain for the Dry River (ephemeral stream). There is a relatively large upstream drainage basin (approx. 3 square miles) that presents an elevated risk of flash flooding from intense thunderstorms and periods of rapid snowmelt. Several existing drainage channels convey this runoff northwest through the site toward Dry River. Climate change may increase flood frequencies and extents, emphasizing the importance of further study and mitigation strategies, including conservatively sized perimeter ditches.	The Roth East site is not directly within mapped flood hazard areas. There is an upstream drainage basin (approx. 1 square mile) that presents a moderate risk of flash flooding from intense thunderstorms and periods of rapid snowmelt. Several channels collect runoff from the northeast slope of Pine Mountain and drain north through the site and discharge to Dry River (ephemeral stream) near Highway 20. The mapped floodplain for the Dry River crosses Highway 20 in several locations, which poses a secondary flood risk to site access. Coordination with state transportation and hazard mitigation agencies is recommended to identify detours and alternate routes in case of disruptions to Highway 20 due to flooding.
<b>Geology/Hydrogeology Assessment</b>	The Moon Pit site is located within a pre-Holocene fault bounded valley with shallow depth to bedrock, resulting in higher excavation costs. Although generally impermeable, fissures and higher-permeable zones in subsurface volcanic materials could allow vertical migration of fluids to groundwater. Depth to groundwater is well-documented by onsite wells at 850 ft below ground surface (bgs). Onsite well yield is very good and water quality is also very good. Due to the significant aquifer depth and arid conditions generating minimal leachate, the risks of groundwater contamination are low.	The Roth East site is located in the Millican Valley with over 300 ft of unconsolidated alluvial deposits, resulting in lower excavation costs. These deposits are unlikely to provide any significant low permeability zones to retard vertical migration of fluids to groundwater. Estimated groundwater depth at the site is anticipated to be at least 450 ft bgs, based on 9 well logs within 2 miles. The onsite well (Powell Deep 1+ mi SW of development area) has very good quality and yield is better than nearby residential/stock wells. Due to the significant aquifer depth and arid conditions generating minimal leachate, the risks of groundwater contamination are low.

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<b>Preliminary Geotechnical Feasibility</b>	The site is situated within an inactive fault-bound depression. Shallow bedrock of differing quality is present, covered by a thin layer (less than 10 feet) of mixed sediments. Drill and blast mining was conducted in the northwest of the property but was discontinued due to low rock quality. Currently drill and blast mining is occurring within the southeast portion of the property, but the quality of the rock is indetermined and no lab testing has been performed. Blasting will likely be required to excavate bedrock to the desired landfill cell depths. The preliminary geotechnical assessment identified no significant issues related to soil stability or geological risks.	The site is on a fan-shaped deposit of sediment, with around 400 feet of mainly gravel layers. These gravels can be used as a potential on-site aggregate resource for site development pending further lab testing. Excavation and grading for the landfill are expected to be done using standard equipment. An assumed fault line runs from a nearby mapped fault to the site's northeast corner, but it is considered inactive in recent geological times. The preliminary geotechnical assessment identified no significant issues related to soil stability or geological hazards.
<b>Environmental Assessment Phase I</b>	Moon Pit is an operating quarry and aggregate pit southeast of Bend. This site does not appear on any environmental regulatory databases that indicate a release of hazardous substances or petroleum. A site reconnaissance in November 2023 noted two diesel above-ground storage tanks (ASTs) in use as well as a boneyard containing considerable old heavy equipment, and some noted de minimis staining. A former asphalt plant which operated on the site during the 1990s represents a Recognized Environmental Condition. A limited Phase II Environmental Site Assessment (ESA) involving soil sampling is recommended to delineate shallow soil sampling in the vicinity of the former asphalt plant and other areas of petroleum staining.	The Roth East site consists of approximately 1,700 acres of vacant land east of Millican. A review of historical documents including aerial photographs and topographic maps revealed no environmental concerns. Site reconnaissance identified two likely empty fuel ASTs with no noted soil staining. These portions of the assessment along with an interview with the current property caretaker did not identify any Recognized Environmental Conditions at the site and no further environmental investigation is recommended.
<b>Weather and Air Quality Desktop Review</b>	Due to resolution of weather and air quality information in Central Oregon, the two proposed sites are represented by the same data. Average annual precipitation in the vicinity of the subject properties is less than 12 inches, so leachate generation is expected to be very minimal. Air quality data (from Prineville) indicate PM2.5 and ozone peaks of 518 micrograms per cubic meter (9/12/20) and 39 parts per billion (also 9/12/20) respectively. Both sites have a relatively low risk score for lightning susceptibility. No local (within 3 miles) permitted air quality facilities or sensitive receptors identified. Prevailing winds for the area are from the SE and NW.	Due to resolution of weather and air quality information in Central Oregon, the two proposed sites are represented by the same data. Average annual precipitation in the vicinity of the subject properties is less than 12 inches, so leachate generation is expected to be very minimal. Air quality data (from Prineville) indicate PM2.5 and ozone peaks of 518 micrograms per cubic meter (9/12/20) and 39 parts per billion (also 9/12/20) respectively. Both sites have a relatively low risk score for lightning susceptibility. No local (within 3 miles) permitted air quality facilities or sensitive receptors identified. Prevailing winds for the area are from the SE and NW. Because of the local topography, the Roth East site is more exposed and likely more susceptible to high winds causing operations issues.
<b>Natural Resources Assessment</b>	No water or wetlands were present at the Moon Pit site and endangered species act (ESA) species are unlikely to be impacted by site development. A golden eagle nest is located within 2 miles of the site and site development would result in permanent alteration of habitat which would require compensatory mitigation. The site is located entirely within winter range habitat for mule deer and elk and essential and limited habitat for pronghorn and impacts as a result of the project must be mitigated to achieve "no net loss" and a "net benefit". In addition, the site development is estimated to impact 7.8 functional acres of greater sage grouse habitat which must be mitigated for and provide a net conservation benefit to sage grouse. The initial cost of mitigation for potential impacts to protected habitat as a result of site development is estimated at \$700,000 with up to \$800,000 in operations and maintenance costs for mitigation sites over 50 years.	No water or wetlands were present at the Roth East site and ESA species in addition to bald and golden eagles are unlikely to be impacted by site development. However, the site is located entirely within winter range habitat for mule deer and elk and essential and limited habitat for pronghorn and impacts as a result of the project must be mitigated to achieve "no net loss" and a "net benefit". In addition, the site development is estimated to impact 173.3 functional acres of greater sage grouse habitat which must be mitigated and provide a net conservation benefit to sage grouse. The initial cost of mitigation for potential impacts to protected habitat as a result of site development is estimated at \$1,500,000 with up to \$2,500,000 in operations and maintenance costs for mitigation sites over 50 years.
<b>Archaeology and Cultural Heritage Assessment</b>	Much of the Moon Pit site is developed and/or disturbed by gravel mining. As a result, the potential for archaeological resources is lower than for the Roth East site. A formal survey of the undisturbed areas is recommended to identify archaeological resources. Resources will need State Historic Preservation Office (SHPO) permits and evaluative site testing. Overall, less resources will require less time and cost for review, permitting, and field investigations.	Roth East is largely undeveloped, which means there is potential for more archaeological resources. A formal archaeological survey is recommended to identify those resources. Resources will need SHPO permits and evaluative site testing. Overall, more resources will require more time and cost for review, permitting, and field investigations, and potentially mitigation.
<b>Community Assessment</b>	Of the two sites, development of Moon Pit is generally viewed as having fewer visual and residential impacts. Because the site is currently used as a gravel mine, there is a perception that use as a landfill would pose minimal new impacts. Public comments about Moon Pit note concerns about potential historical or cultural loss due to proximity to a Native American petroglyph site. Comments also note potential disruption to recreation in the adjacent Badlands Wilderness Area. Similar to the Roth East site, there are concerns about potential impacts to habitat and area wildlife.	Of the two sites, development of Roth East is generally viewed as having more visual and residential impacts. Public comments about the Roth East site note concerns about potential impacts to Millican Valley landowners, area recreation, and the Pine Mountain Observatory. Specifically, the potential for high winds to spread debris and dust and concerns about contamination of local groundwater have been noted. Similar to the Moon Pit site, there are concerns about potential impacts to habitat and area wildlife.
<b>Cost Analysis</b>	Initial development costs are estimated at \$50-\$64 million, which includes \$15.4-\$15.9 million for land acquisition. Landfill cell development costs are estimated at \$705,000-\$1,075,000 per acre. Annual operating costs are estimated at \$7.6 million per year, which includes \$2.5 million/year for waste hauling. The estimated average cost per ton is \$43-\$48, to dispose of roughly 38 million tons over a 100-year lifespan. The cost estimate ranges presented here depend on the extent and cost of cell excavation that could occur as a part of aggregate mining operations onsite. There is greater upside potential for the Moon Pit site due to opportunities for more aggregate mining during landfill operations. Initial capital costs are significantly higher at Moon Pit, which will necessitate higher tip fees for the first 20 years.	Initial development costs are estimated at \$36 million, which includes \$5.5 Million for land acquisition. Landfill cell development costs are estimated at \$393,000 per acre. Annual operating costs are estimated at \$8.4 million/year, which includes \$3.3 million/year for waste hauling. The estimated average cost per ton is \$44.50, to dispose of roughly 46 million tons over a 113-year lifespan. While the Roth East site is offered at a lower acquisition price and will have lower cell excavation costs, the additional operational costs for further waste hauling are projected to drive total cumulative costs beyond that of Moon Pit around year 83 of operations (circa 2112).