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Ben Burr, Executive Director
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Holly Jewkes, Forest Supervisor
Deschutes National Forest
63095 Deschutes Market Road
Bend, OR 97701

Dear Supervisor Jewkes,

BlueRibbon Coalition (BRC) is writing to provide comments on the U.S. Forest Service's 2026 Newberry Geothermal Consent to Lease and Forest Plan Amendment Draft Environmental Assessment (EA), Project No. 387325, on the Bend-Fort Rock Ranger District of the Deschutes National Forest. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, snowmobiles, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those managed by the Forest Service. Many of our members and supporters live near public lands or travel across the country to visit them and use motorized vehicles to access National Forest System lands. BRC members visit these areas for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, winter recreation, and other similar pursuits. We would like to add our support to any comment submitted by any other

individuals or organizations that advocate for motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

BRC's comments are limited to recreation and access. BRC supports the recreation and snowmobile protections already written into the Draft EA and urges the Forest Service to carry them into the final decision without weakening them. BRC also asks the Forest Service to analyze keeping temporary roads open to the public instead of decommissioning them, to limit any recreation closure to the shortest and smallest scope workable and lift it immediately, and to reject any permanent loss of recreation opportunity unless a replacement route of similar recreation value is opened. BRC asks the Forest Service to carry the following into the final decision:

- Retain Stipulations 7, 55, 56, 57, and 59 and the recreation controlled surface use stipulation, and require public notice and comment on any waiver or modification that reduces recreation protection.
- Confirm that Stipulation 57 covers trailheads, parking, and staging areas serving designated snowmobile routes, and schedule any work outside the December 1 to March 31 season wherever feasible.
- Revise Stipulation 33 so that decommissioning of temporary roads is not automatic, and require site-specific NEPA to analyze keeping temporary roads open to public use.
- Require that any recreation closure be limited in scope, carry a stated end date, and be lifted immediately when the hazard ends.
- State that this decision authorizes no permanent recreation closure, and that any later permanent closure requires a replacement route of similar recreation value.

Support the Recreation Protections in the Draft EA

The Draft EA identifies snowmobile and Nordic winter trails, the Peter Skene Ogden National Recreation Trail, outfitters and guides who use the snowmobile trails, and the Newberry Portal developed recreation site within the nominated parcels. It acknowledges that future geothermal activity could change the recreation setting and could limit trail use, snowmobiling, and access to developed and undeveloped dispersed sites. BRC supports the lease stipulations in Appendix B that address these resources:

- Stipulation 57 (Snowmobile Winter Trails) prohibits snow-plowing roads on designated snowmobile trails and prohibits wheeled vehicle use on those trails from December 1 to March 31 (Parcels 1, 3, 4, 5, 6, 7, 9, 10, 11, 12, and 13).
- Stipulation 56 (Nordic Trails) applies controlled surface use within 300 feet of either side of the winter trails on Parcel 5.
- Stipulation 55 (Peter Skene Ogden National Recreation Trail) applies controlled surface use within ¼ mile of either side of the trail on Parcel 3.
- Stipulation 59 (Recreation Opportunity Spectrum) applies no surface occupancy or controlled surface use in areas classified Roaded Natural or Semi-Primitive Motorized, to protect dispersed recreation.
- Stipulation 7 and the recreation controlled surface use stipulation require public safety measures that keep closures limited in duration and protect both motorized and non-motorized recreational values.

Snowmobiling is a primary winter use on these parcels, and outfitters and guides depend on it. BRC asks the Forest Service to confirm that Stipulation 57 covers trailheads, parking, and staging areas that serve designated snowmobile routes, and to require that site-specific analysis consider scheduling exploration or construction outside the December 1 to March 31 season wherever that is feasible.

Nearly every recreation stipulation in Appendix B states that waivers, exceptions, or modifications require evaluation through the NEPA process. BRC asks that any proposed waiver, exception, or modification that would reduce protection of recreation, including snowmobile use, be analyzed in site-specific NEPA with public notice and an opportunity to comment. BRC also notes that the Draft EA describes the Paulina Creek corridor as 0.25 mile in the Wild and Scenic Rivers discussion and the general stipulations but as one-third of a mile in Stipulation 58, and asks the Forest Service to resolve that inconsistency in the final document. Because the Newberry Portal developed site is identified as a recreation resource but is not named in a specific stipulation, BRC asks the Forest Service to confirm that the recreation controlled surface use stipulation applies to it.

Analyze Public Use of Temporary Roads Instead of Decommissioning Them

Stipulation 33 directs that public access be discouraged on temporary or closed roads used for geothermal activities, using signs, barriers, or gates, and that those roads be closed and

obliterated when the work is finished. The stipulation lists masking or obliterating entrances, subsoiling, loosening compacted soils with excavator bucket teeth, re-contouring cuts and fills, hydrologic stabilization, seeding, and placing slash or other organic material over treated surfaces.

BRC asks the Forest Service to analyze, in this decision and in any later site-specific NEPA, an option that allows the public to continue using temporary roads after geothermal activity ends rather than defaulting to decommissioning. Decommissioning costs money and carries its own environmental impact. Obliteration requires additional heavy equipment work, ground disturbance, and soil manipulation on a road that has already been built, and the Draft EA itself recognizes that soil displacement, compaction, and vegetation removal increase the likelihood of invasive species establishment. Re-closing, monitoring, and restoring treated surfaces is also a continuing cost and workload for the operator and the agencies. A road already built to support geothermal work can provide access for dispersed camping, hunting, and other recreation, consistent with the Draft EA's recognition of undeveloped dispersed sites on these parcels.

BRC recognizes that retaining a road for public use involves maintenance responsibility and the Forest's travel management process. That tradeoff should be analyzed and disclosed alongside the cost and impact of decommissioning so the decision maker can compare them. BRC requests that Stipulation 33 be revised so that decommissioning is not automatic, and that the Forest Service evaluate, through site-specific NEPA with public involvement, whether each temporary road should be retained for public use.

Temporary Closures Must Be Limited and Lifted Immediately

Geothermal exploration and development should not close recreation opportunities for the public. BRC understands that short closures can be necessary for public safety during active operations. Any such closure should be limited to the specific road, trail, or area that poses a hazard, not an entire parcel or project area. It should be tied to active operations, with a start date and a firm end date stated in the closure order and the shortest duration that is workable. The area should reopen to the public immediately when the hazard ends, with advance notice of closures and reopenings posted on the Forest website and on site.

BRC supports the direction in Stipulation 7 that closures be limited in duration to preserve long-term public access for dispersed recreation, and asks that the final decision make this concrete by requiring the measures above in site-specific analysis.

Permanent Closures

The Draft EA does not propose permanent closures, and BRC asks that the final decision state expressly that this consent to lease authorizes none. If a later site-specific proposal would permanently close a road, trail, or area to recreation, BRC strongly opposes that outcome. BRC would consider a permanent closure only if a new route or area is opened that offers similar recreation value, meaning a comparable type of use, length, setting, difficulty, and access, and only if the replacement is available to the public before or at the same time as the closure. Congress recognized the importance of outdoor recreation access on federal lands in the EXPLORE Act (Pub. L. 118-234), and BRC asks the Forest Service to apply a no-net-loss approach to recreation access in any site-specific decision that follows from this one.

Conclusion

BRC supports the recreation and snowmobile protections in the Newberry Geothermal Consent to Lease Draft EA and asks the Forest Service to analyze public use of temporary roads in place of decommissioning, to keep any recreation closure short and lift it immediately, and to allow no permanent recreation closure without a replacement route of similar recreation value.

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,





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