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First name: Terry

Last name: Turner

Organization: Trout Unlimited, Clackamas River Chapter

Title: Tresurer, Board of Trustees

Comments: Comment on Consent for Geothermal Leasing, Mt. Hood National Forest, Clackamas Ranger District

Trout Unlimited is a grass-roots non-profit organization is a leader in cold water habitat restoration. The Clackamas River Chapter has over 600 members, many have volunteered in restoration projects in the Clackamas Basin. The Clackamas River Chapter has, through grants, implemented nearly \$1,000,000 in restoration in the Cub Creek, Berry Creek area to the confluence with the Clackamas River. Because of the unique hydrology, this area is one of the targets for additional flood plain restoration work. This restoration is inside the 2020 Lion's Head fire zone and would provide critical spawning and rearing habitat for listed salmon and steelhead.

The Clackamas Chapter of Trout Unlimited respectfully submits the following comment regarding the proposed action for consent to geothermal leasing on Bureau of Land Management (BLM) and U.S. Forest Service (USFS) lands in the Mt Hood National Forest.

We strongly recommend the selection of the No Action Alternative. This alternative appropriately upholds the long-term health and integrity of sensitive ecosystems and preserves public trust resources that could be irreversibly harmed by geothermal development. The Clackamas River Chapter of TU has worked closely with USFS representatives of the Clackamas Ranger District in an effort to restore the flood plain in the area just downstream of the proposed geothermal test site. We have put in significant effort and money restoring this area from past logging practices and fire impact, and the geothermal site is not consistent with the restoration efforts in this area. A map of our project site is included in our comments.

According to the proposal, geothermal leasing could result in adverse impacts including habitat fragmentation, disruption to wildlife corridors, and degradation of watersheds, particularly those in or near Inventoried Roadless Areas and areas with special designations such as Research Natural Areas and Wild and Scenic River corridors. The region in question supports diverse flora and fauna, including species with limited ranges and heightened sensitivity to habitat alteration. Introducing industrial-scale geothermal development in these areas poses substantial ecological risks that may not be mitigable, even with best practices.

Furthermore, the proposal acknowledges that geothermal exploration and subsequent development would involve road construction, drilling, and other ground-disturbing activities that could undermine the scenic, recreational, and cultural values of these national forests. These lands are not merely resource repositories-they are cherished for their solitude, biodiversity, and recreational opportunities. Once compromised, these qualities cannot be fully restored.

Critically, the No Action Alternative is the only scenario that ensures no new leasing will occur, thereby eliminating the potential for direct, indirect, and cumulative environmental harm. Given the magnitude of the potential impacts and the unique ecological and recreational importance of the affected areas, exercising precaution is both rational and responsible.

Additionally, this alternative does not preclude future consideration of renewable energy projects in more appropriate, less sensitive areas. It simply recognizes that the lands identified in the current proposal may not be suitable for industrial development, and it defers such activities in favor of long-term conservation and ecosystem resilience.

In conclusion, I urge the U.S. Forest Service to adopt the No Action Alternative. It is the most environmentally sound and publicly beneficial course of action available, and it aligns with the agency's mission to sustain the health, diversity, and productivity of the nation's forests for present and future generations.