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Organization:

Title:

Comments:

?Official Comment Submitting Opposition to Geothermal Exploration Leasing Consent

?Please accept this public comment in opposition to the Deschutes National Forest granting administrative consent to the Bureau of Land Management (BLM) for geothermal exploration and development leasing across approximately 29,477 acres of National Forest System lands.

?As a member of the public concerned with the long-term health and preservation of Central Oregon's natural resources, I submit these comments during the designated comment period to formally establish my standing for any subsequent administrative review or appeal procedures regarding this proposed action.

?I urge the Forest Service to withhold consent (adopt the "No Action" alternative) based on the following fact-based ecological and environmental impacts associated with geothermal exploratory activities:

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?1. Severe Surface Disturbance and Forest Habitat Fragmentation

?Geothermal exploration is far from "impact-free." Before any energy is generated, exploratory phases require substantial surface infrastructure:

?Road Construction and Pad Development: Clearing vegetation, grading, and compacting soil for multi-acre drill pads, sump pits, staging areas, and heavy-equipment access roads disrupt intact forest canopy.

?Invasive Species Vectors: Earth-moving equipment and continuous vehicular traffic clear native understory and introduce noxious, highly flammable weeds (such as cheatgrass), altering natural fire regimes in fire-prone pine ecosystems.

?Soil Erosion and Runoff: Compacted soils lose permeability, leading to increased surface erosion, sediment runoff into local watersheds, and permanent degradation of topsoil layers.

?2. Disruption to Local Hydrology and Hydrothermal Systems

?The Deschutes National Forest sits atop a complex volcanic and hydrological network. Exploratory well drilling and geothermal testing present significant hydrological risks:

?Aquifer Contamination and Depletion: Deep exploratory drilling cuts through shallow groundwater aquifers.

Without flawless casing, toxic geothermal fluids containing heavy metals, arsenic, and dissolved solids can cross-contaminate municipal and agricultural water sources.

?Hydrothermal Alteration: Disrupting subterranean pressure and temperature gradients through test pumping or drilling can permanently degrade natural hot springs, alter steam vents, and harm subsurface microbial and aquatic ecosystems reliant on stable geothermal thermal regimes.

?Water Consumption: Exploratory drilling and well-stimulation consume significant volumes of local fresh water in a region already facing seasonal drought stress and water allocation limits.

?3. Critical Wildlife Disturbance and Displacement

?The targeted 29,477 acres provide critical habitat, movement corridors, and wintering grounds for native wildlife species (including mule deer, elk, raptors, and sensitive aquatic/amphibian species):

?24/7 Noise and Light Pollution: Exploratory drilling operates continuously day and night. High-decibel noise from diesel generators, drill rigs, and steam venting displaces wildlife, raises stress hormones, and interferes with wildlife communication and mating calls.

?Habitat Functional Loss: Even if physical footprints appear localized, the "edge effect" and disturbance buffer

created by exploratory activities render surrounding habitat unusable for sensitive species over much larger zones.

?4. Risk of Induced Seismicity and Toxic Atmospheric Releases

?Micro-Seismicity: Exploratory testing involving fluid injection or rapid temperature changes in subsurface fractures increases the risk of induced seismic events, potentially altering subterranean fault stability.

?Air Quality Impacts: Well testing and venting frequently release hydrogen sulfide (H₂S), carbon dioxide (CO₂), methane, and volatile organic compounds into the local airshed, endangering local wildlife and degrading air quality in pristine forest environments.

?5. Impermissible Piecemealing of Environmental Review

?While leasing and exploratory consent are designated as "administrative actions," leasing effectively commits public land to industrial trajectories. Granting consent without a comprehensive Environmental Impact Statement (EIS) that fully analyzes the cumulative, site-specific footprint of exploratory well networks, seismic surveys, and long-term industrial conversion violates the spirit of the National Environmental Policy Act (NEPA). Exploration cannot be viewed in isolation from the inevitable ecological degradation it initiates.

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?Due to the severe, irreversible, and deleterious impacts that exploratory drilling, road building, hydrological disturbance, and habitat fragmentation pose to the natural resources of the Deschutes National Forest, I respectfully request that the Forest Service deny consent to the BLM for geothermal leasing across all nominated 29,477 acres.

?Thank you for documenting these comments into the official public record and preserving my standing for administrative review.