

Data Submitted (UTC 11): 10/12/2026 8:46:59 PM

First name: Delores

Last name: Porch

Organization:

Title:

Comments: How do you make an educated comment on an administrative action with limited information on what the project actually looks like or how it affects the environment and cultural situation? That is my core objection, and I am filing it now because the Forest Service has not given the public enough to work with.

I photograph wildlife and birds in the Deschutes National Forest. The land in question is the land I watch and photograph. Telling me that a decision covering nearly 30,000 acres is "an administrative action only" while simultaneously routing it through NEPA as an Environmental Assessment does not resolve the threshold question, it evades it. The Project Summary states that this decision concerns "nominated National Forest System lands for geothermal exploration and development. This decision is an administrative action only." That label implies the agency has already concluded that consenting to lease this acreage is not a major federal action significantly affecting the environment. But that conclusion is precisely what a NEPA analysis is supposed to reach through analysis, not assume before the analysis begins. The agency must publish a written threshold determination explaining why this consent qualifies as an administrative rather than a major federal action, and it must respond to that question specifically on the record, or it must prepare a full Environmental Impact Statement.

The Project Overview states that the project will "grant consent to lease approximately 29,477 acres of nominated National Forest System lands for geothermal exploration and development," yet the project status remains at Developing Proposal, with no published extraordinary-circumstances evaluation and no categorical-exclusion review visible to the public. A pre-selected analysis tier is not a substitute for a significance determination. The agency should publish its threshold rationale before locking in the EA as the analysis type. If that rationale cannot be sustained, an EIS is the appropriate path.

29,477 acres is a lot of land with no information. The wildlife and birds I come to photograph do not stop at administrative boundaries. I am asking the agency to show its work before this decision moves forward.