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Comments: Geothermal development has a high impact on the environment, and this project is being advanced without the thorough analysis it demands. I oppose the 2026 Newberry Geothermal Consent to Lease and urge the agency to address the deficiencies described below before any decision is finalized.

The notice states at the Project Overview that this action would grant consent "to grant consent to lease approximately 29,477 acres of nominated National Forest System lands for geothermal exploration and development." An action of that scale is not a minor procedural step, yet the agency frames it as one, declaring at the Project Overview that "approximately 29,477 acres of nominated National Forest System lands for geothermal exploration and development. This decision is an administrative action only." The phrase "administrative action only" is left entirely undefined. That label could quietly exclude from the EA whole categories of potential impact, including subsurface water effects, induced seismicity, and surface infrastructure, without telling the public which categories are out of scope or why. The agency must define what that label means in practice, identify which categories of impact the framing removes from analysis, and provide the legal basis for any such exclusion. Clean water matters to me, and I need to know whether effects on the water resources this forest supports are even inside the scope of the EA being prepared.

Managing the national forest responsibly requires thorough analysis, not categorizing such a large project under a vague label. Central to that concern is the agency's choice of an Environmental Assessment rather than an Environmental Impact Statement. Geothermal development involves subsurface drilling, fluid injection, potential induced seismicity, and surface facility construction across a very large footprint. The notice provides no extraordinary circumstances screening, no explanation of why an action at this scale does not significantly affect the human environment, and no discussion of why an EIS is not required. The agency should either prepare an EIS or provide in the EA a complete extraordinary circumstances analysis with site-specific rationale explaining why significant impacts are not expected across this acreage. I am asking the agency to show that analysis in full.

A further gap concerns the treatment of exploration and development as a single undivided action. The Project Overview states the consent would apply to land nominated "for geothermal exploration and development," yet nowhere does the notice distinguish between the exploratory phase, with its test wells, access roads, and fluid injection testing, and full commercial development, which could include power plant construction, transmission lines, and continuous operation across nearly 30,000 acres for decades. NEPA requires analysis of the full scope of reasonably foreseeable connected actions, not only the first step that opens the door to them. The EA must treat exploration and development as distinct phases, disclose what activities the consent to lease authorizes at each phase, and analyze the complete build-out that a successful exploration program would support. Whether it does so is something the agency must address squarely.