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Portland Eugene Bend Enterprise

14 Oct 2026

TO: Holly Jewkes, Deschutes Forest Supervisor

VIA: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=387325>

Subject: Newberry Geothermal Consent-to-Lease EA — comments

Please accept the following comments from Oregon Wild concerning the Newberry Geothermal Consent-to-Lease EA,

https://www.fs.usda.gov/ro6/deschutes/projects/387325?utm_source=MarketingCloud&utm_medium=email. Oregon Wild represents 20,000 members and supporters who share our mission to protect and restore Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded.

This proposal involves a decision by the Deschutes National Forest whether to grant the Bureau of Land Management (BLM) request to consent to lease approximately 29,477 acres of nominated National Forest System lands for geothermal exploration and development. Forest Service proposes to consent to the BLM leasing to third-parties approximately 24,682 acres in 12 parcels. The proposal includes a plan amendment to allow removal of large trees. Two of the nominated parcels (4,795 acres) are located in the Special Management Area of the Newberry National Volcanic Monument, the Forest Service proposes to withhold consent for these two parcels. Consenting to lease does not propose any ground disturbing activities. Prior to any future exploration or development activities, site-specific NEPA analysis must be completed.

Site-specific analysis of potentially significant effects

There are important resources in the project area that need to be carefully considered: mature and old growth trees and forests, unroaded areas, biogenic carbon stores, recreation and visual resources, etc. Several of the proposed parcels appear to conflict with the compelling need to conserve these values.

The EA says that there is no need to do site-specific analysis of the effects of geothermal development in this EA because this consent-to-lease does not authorize ground-disturbing activities, and actual development proposals will be subject to further NEPA review. Unfortunately that is not what we are seeing. The agencies are using CE's to approve exploration, drilling, testing, roads, water supplies, and actual ground disturbance without full NEPA review. This is improper.

There are problems with approval of geothermal projects with CEs.

- CEs are often completed in an abbreviated process that leaves insufficient time for agency specialists to conduct thorough field investigations and effects analysis.
- CEs often involve little to no public notice and opportunity to comment.
- Inadequate PDCs, and lack of agency oversight of implementation of PDCs.

This consent-to-lease proposal appears to contemplate potentially significant expansion of geothermal development around Newberry Crater. This raises the prospect of potentially significant direct and cumulative environmental effects on soil, water, wildlife, weeds, old growth trees, natural disturbance processes, OHVs, recreation, scenic values, carbon storage, fire hazard, recreation, threatened whitebark pine trees, etc... This proposal demands an EIS.

The EA needs to adequately discuss cumulative impacts in its many dimensions: fossil + non-fossil energy development, or multiple concurrent geothermal energy developments, or geothermal project plus other activities as they impact soil, water, wildlife, vegetation, old growth, roadless areas, fire hazard, carbon/climate, etc.

All drilling waste and used drilling mud should be exported from the site. Ponds to store drilling waste and drilling mud should not be allowed on public land.

The impacts of associated roads and power transmission facilities also need to be carefully considered and fully mitigated.

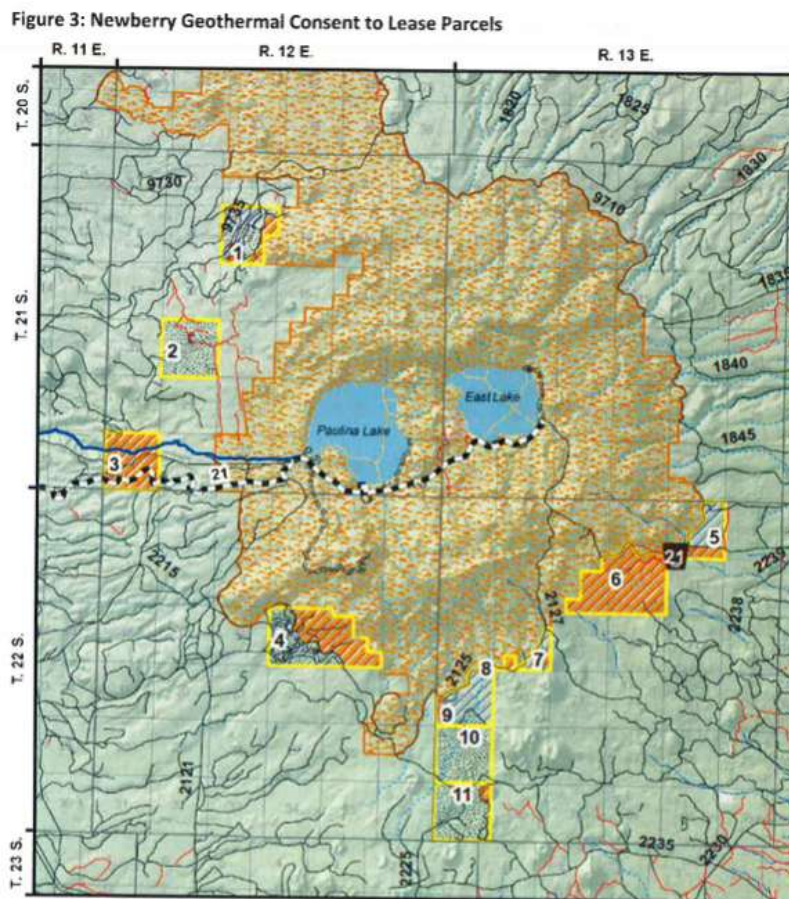
Oregon Wild supports the most stringent lease stipulations to minimize the footprint of geothermal development activities and protect soil, water, vegetation, wildlife habitat, unroaded areas >1,000 acres, scenic values, carbon storage, non-motorized recreation, etc.

We strongly support full reclamation at end-of-life as a stipulation for all leases.

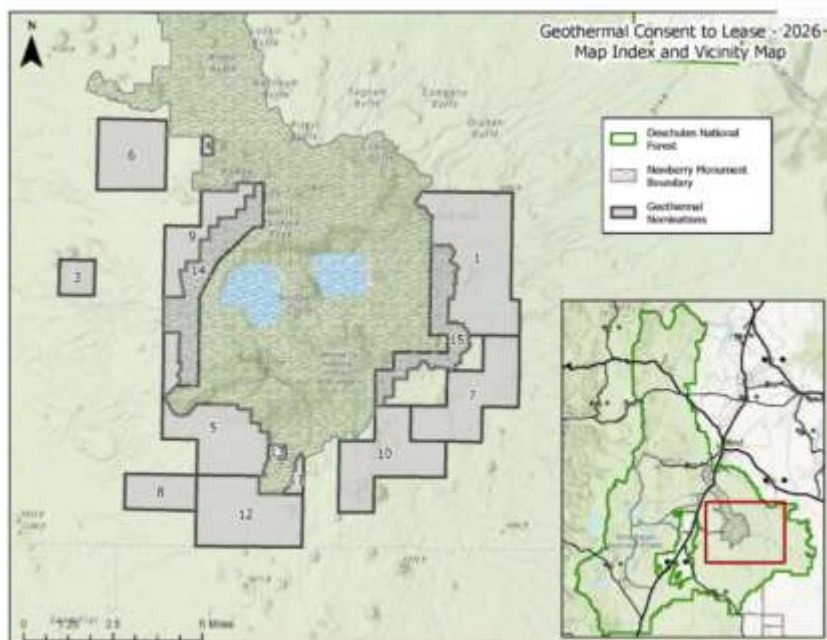
Reliance on the 2014 EA has problems.

This EA relies on a Determination of Analysis Reliance (DAR) which determines that the 2026 Geothermal Consent to Lease Project may rely on the environmental analysis and supporting analysis completed for the 2014 Newberry Geothermal Consent to Lease EA. The 2026 EA asserts that (i) the 2014 and 2026 proposals are “in the same location” and (ii) the reasonably foreseeable development scenario is the same between the current project and 2014 project. The problem is that the 2014 and 2026 proposals are not in the same location (which renders the site specific analysis in the 2014 EA inapplicable) and, because the locations are not the same, therefore the reasonably foreseeable development scenarios cannot be the same. In addition, the 2026 parcels appear to be entirely additive, so additional geothermal development, additional support facilities, additional water use, and additional ground disturbance are anticipated, and there are cumulative effects associated with these additional impacts that are not considered in either EA.

Map of 2014 Parcels (numbered polygons):



Map of 2026 Parcels (numbered grey polygons):



Large Tree Amendment Not Needed

Oregon Wild is concerned about the proposed plan amendment allowing cutting of large trees. What is the purpose? The 2014 EA was approved without such an amendment, so why is new authority needed now? Why can't this issue be deferred to site-specific analysis of individual development proposals?

We understand that geothermal development may require some clearing of trees, but we would hope that surface occupancy could be directed toward areas without large trees to the extent possible.

Large tree removal adds to the NEPA significance of this project by (i) causing significant ecological effects (ii) by causing controversy around mature and old-growth tree removal, and (iii) by threatening violation of legal requirements intended to protect the environment.

The legacy of past clearcutting, high grading, salvage, livestock grazing, fire suppression and road building, have pushed the eastside forest ecosystems far beyond the natural range of variability for mature and old-growth forests. The eastside forests and BLM districts lack any completed NEPA process to account for this fact. Until the forest plan and RMPs are properly amended to account for all the new information and cumulative effects, all the remaining medium and large trees should be retained.

We object to the removal of large trees >21" dbh, as well as "old" trees less than 21 inches dbh which can be old and ecologically valuable. We urge the agency to protect trees with "old-growth morphology" regardless of size. (e.g. Yellow-barked ponderosa pine or any species with large drooping limbs, twisted trunks or flattened tops.)

Purpose and Need / National Energy Policy

There is no compelling purpose and need for this dramatic expansion of geothermal lease opportunities, since (as far as we are aware) most of the parcels approved in 2014 have not been leased or developed.

Oregon Wild is concerned about haphazard development of geothermal energy resources around Newberry Crater National Monument. We have been asked to comment on a plethora of proposals over the course of the last 20 years. We are not sure how this effort is connected to existing geothermal testing and development proposals in the area. We would like to see a cohesive and integrated plan, and a comprehensive analysis of cumulative impacts.

Geothermal energy might be part of a viable future for renewable, non-fossil energy, however this requires that new non-fossil energy developments be coupled to direct reductions in fossil energy use. Current energy policy, or the lack thereof, results in significant adverse cumulative effects from the ecological footprint of new and expanded renewable energy development, plus the adverse effects from continuing unchecked use (and even expansion) of fossil fuels. This proposal should be preceded by a sound national energy plan that addresses the serious threat of global climate change by requiring significant and immediate absolute reductions in

greenhouse gas emissions. This issue is not outside the scope of this project - not as long as this project will contribute to the adverse cumulative effects described.

Exclude Unroaded Areas from the lease area

The map below shows (in the darker shade of purple) ecologically significant unroaded areas >1,000 acres surrounding Newberry Caldera. Many of these unroaded area overlap with proposed lease parcels, including: parcels 6, 7, 10, and 12.



The NEPA analysis cannot be limited to effects on inventoried roadless areas >5,000 acres, because smaller roadless areas that were not inventoried are ecologically relevant and potentially significant. The NEPA analysis must reflect the growing scientific evidence (cited below) indicating the significant value of roadless areas smaller than 5,000 acres and larger than 1,000 acres. Recent scientific literature emphasizes the importance of unroaded areas greater than 1,000 acres as strongholds for the production of fish and other aquatic and terrestrial species, as well as sources of high quality water. Land clearing, energy development, tree removal and/or road building within unroaded areas threatens these significant ecological values.

Large unroaded areas are important simply due to the fact that they better represent the historic condition that species evolved with but they are now rare on the landscape due to human activities that have degraded and fragmented the majority of the landscape. For instance, the mature and old-growth forests located within unroaded areas is likely much less fragmented than the mature and old-growth forests located outside these unroaded areas. The Northwest Forest Plan LSOG Effectiveness Monitoring Plan says that “perhaps 80 percent or more [of the historic late-successional old-growth forest] would probably have occurred as relatively large (greater than 1,000 acres) areas of connected forest.” Miles Hemstrom, Thomas Spies, Craig Palmer, Ross Kiester, John Teply, Phil McDonald, and Ralph Warbington; Late-Successional

and Old-Growth Forest Effectiveness Monitoring Plan for the Northwest Forest Plan, USFS General Technical Report PNW-GTR-438; December 1998; http://www.fs.usda.gov/pnw/pubs/gtr_438.pdf. Currently, these 1,000 acre and larger patches are rare on the landscape.

World Wildlife Fund and the Conservation Biology Institute summarized the important attributes of small roadless areas (1,000-5,000 acres).

Small roadless areas share many of attributes in common with larger ones, including:

- Essential habitat for species key to the recovery of forests following disturbance such as herbaceous plants, lichens, and mycorrhizal fungi
- Habitat refugia for threatened species and those with restricted distributions (endemics)
- Aquatic strongholds for salmonids
- Undisturbed habitats for mollusks and amphibians
- Remaining pockets of old-growth forests
- Overwintering habitat for resident birds and ungulates
- Dispersal “stepping stones” for wildlife movement across fragmented landscapes

DellaSala, Dominick and James Strittholt. 2002. Scientific Basis For Roadless Area Conservation. World Wildlife Fund. Ashland, OR; Conservation Biology Institute. (June 2002 - Updated October 2003) https://consbio.org/wp-content/uploads/2022/05/Scientific_Basis_For_Roadless_Area_Conservation.pdf.

In a 1997 letter to President Clinton, 136 scientists said:

There is a growing consensus among academic and agency scientists that existing roadless areas—irrespective of size—contribute substantially to maintaining biodiversity and ecological integrity on the national forests. The Eastside Forests Scientific Societies Panel, including representatives from the American Fisheries Society, American Ornithologists’ Union, Ecological Society of America, Society for Conservation Biology, and The Wildlife Society, recommended a prohibition on the construction of new roads and logging within existing (1) roadless regions larger than 1,000 acres, and (2) roadless regions smaller than 1,000 acres that are biologically significant.... Other scientists have also recommended protection of all roadless areas greater than 1,000 acres, at least until landscapes degraded by past management have recovered.... As you have acknowledged, a national policy prohibiting road building and other forms of development in roadless areas represents a major step towards balancing sustainable forest management with conserving environmental values on federal lands. In our view, a scientifically based policy for roadless areas on public lands should, at a minimum, protect from development all roadless areas larger than 1,000 acres and those smaller areas that have special ecological significance because of their contributions to regional landscapes.

Letter to President Clinton from 136 scientists (Dec. 10, 1997).

https://drive.google.com/file/d/0B4L_-RD-MJwrRzhFcm5QcFRoMHM/view?usp=sharing&resourcekey=0-2-sbGMN3bOUBQGGMDBQM1Q

Unacceptable visual impacts if buttes are developed

We urge the Forest Service to withdraw the parcels that are located on cinder cones and other buttes (e.g., parcels 7, 9, 10, and 12) especially if the leases would allow surface development that would be visible from afar. The FS should also carefully consider the fact that slopes are at higher risk from fast moving wildfires.

Visual impacts from the vantage of Paulina Peak should be avoided and minimized.

Protect Paulina Lake and the Monument

Parcel 9 should be dropped because it is just too close to Paulina Lake and the National Monument. The sights and sounds of geothermal development may impact visitors to the monument. We support the exclusion of Parcel 14, but the same logic that applies to Parcel 14, should be extended to Parcel 9 as well.

Water supply

The EA lacks an adequate discussion of water demands associated with geothermal development. Producing geothermal energy virtually always requires water, but there is a serious shortage of available water resources in the project area. The lack of water renders much of this project area unsuitable for energy development.

Road impacts

The EA anticipates significant road construction will be required. Recognizing that roads have serious adverse impacts, we urge that new roads be minimized. Development should focus near existing roads. Stipulations should also require effort to limit the impact of expanding OHV activity in developed areas.

Transmission line impacts

New powerlines are a concern because this is a forested area. New powerlines will require clearing of vegetation and fragmentation and loss of forest habitat. Forest fires are a natural occurrence in this area and smoke can cause powerlines to arc and ignite new fires. The FS should require stipulations such as fully insulated powerlines in order to minimize this known hazard.

Fire hazard issues

Building new infrastructure within a fire prone forest type does not make a lot of sense. It will create and perpetuate a need to suppress fire which is a natural and beneficial process within this ecosystem. The EA does not disclose the adverse effects of continued fire suppression around the new energy development sites and access road and powerlines.

The transmission infrastructure could also cause arcing and stat fires.

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Each substantive issue discussed in these comments should be (i) incorporated into the purpose and need for the project, (ii) used to develop NEPA alternatives, including mitigation alternatives, that balance tradeoffs in different ways, (iii) carefully analyzed and documented as part of the effects analysis, and (iv) used to inform the finding of significance.

The NEPA analysis should clearly document how proposed activities will comply with substantive requirements including applicable laws and the LRMP as amended.

Please post to the project website before the public comment period, georeferenced maps of the proposed activity units that can be used to navigate in the field using apps such as Avenza.

Please provide Oregon Wild with timely notice of any forthcoming comment opportunities, and any draft and final decisions on this project. If the agency discovers new information or changed circumstance or modifies the project or the analysis after the decision, Oregon Wild requests to be notified and provided an opportunity to comment.

Note: If any of these web links in these comments are dead, they may be resurrected using the Wayback Machine at Archive.org. <http://wayback.archive.org/web/>

Sincerely,

A handwritten signature in black ink that reads "Doug Heiken". The signature is written in a cursive, flowing style.

Doug Heiken (he/him)
dh@oregonwild.org