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Official Public Comment

2026 Newberry Geothermal Consent to Lease Draft Environmental Assessment

October 15, 2026

Holly Jewkes, Forest Supervisor
Deschutes National Forest
63095 Deschutes Market Road
Bend, OR 97701

RE: 2026 Newberry Geothermal Consent to Lease Draft Environmental Assessment - Project No. 387325

Dear Supervisor Jewkes:

The Oregon State Snowmobile Association (OSSA) appreciates the opportunity to comment on the 2026 Newberry Geothermal Consent to Lease Draft Environmental Assessment.

OSSA represents snowmobile clubs and riders throughout Oregon and administers an extensive trail grooming and maintenance program in cooperation with the Oregon Department of Transportation, the U.S. Forest Service, local snowmobile clubs, and other partners.

The proposed geothermal lease area is of particular concern to OSSA because the La Pine Lodgepole Dodgers Snowmobile Club maintains and grooms snowmobile trails in the Newberry area. These trails provide important winter recreation opportunities and are part of an established grooming system maintained for public use.

OSSA understands that the current decision is administrative in nature and would determine whether approximately 24,682 acres of National Forest System lands are available for geothermal leasing. We also understand that this decision does not itself authorize ground-disturbing or site-specific exploration or development and that additional environmental review would be required before future geothermal activities could occur.

However, because leasing could lead to future exploration and development, OSSA believes it is important to identify potential impacts to the existing snowmobile trail and grooming system at this stage of the process.

Future geothermal exploration and development could potentially affect groomed snowmobile routes through road construction, winter road plowing, heavy-equipment traffic, temporary or permanent trail closures, vegetation removal, road and trail crossings, or relocation of existing routes. These activities could also affect the ability of grooming equipment to safely access and maintain established routes.

OSSA respectfully requests that the Forest Service and Bureau of Land Management recognize and protect the existing snowmobile trail and grooming system as future geothermal activities are considered.

1. **Existing groomed snowmobile routes be identified and mapped** in relation to the proposed geothermal lease parcels before future site-specific activities are authorized.
2. **OSSA and the La Pine Lodgepole Dodgers be included in coordination and planning** for any future exploration or development that could affect a groomed snowmobile route, grooming access, trailhead, Sno-Park, or other winter recreation infrastructure.
3. **Continuity of established snowmobile routes be maintained** whenever practicable during exploration, construction, operation, and reclamation activities.
4. **Future geothermal activities avoid plowing established groomed snowmobile routes during the winter recreation season** whenever practicable. When winter plowing or industrial access is unavoidable, safe and reasonable alternative snowmobile access should be provided.
5. **Where geothermal roads, equipment, or vehicle traffic intersect groomed snowmobile trails, appropriate safety measures, signing, and coordination be required** to protect snowmobilers, groomer operators, workers, and other winter recreation users.
6. **If an established snowmobile trail must be temporarily or permanently relocated because of geothermal activity, a suitable replacement route should be established** in consultation with OSSA, the La Pine Lodgepole Dodgers, and the Forest Service before the existing route becomes unavailable whenever practicable.
7. **Costs associated with trail relocation, brushing, signing, restoration, or other mitigation made necessary by geothermal exploration or development should not be shifted** to OSSA, the local snowmobile club, or Oregon's snowmobile grooming program.
8. **Following exploration or development, affected snowmobile routes and grooming access should be restored** to a condition suitable for continued public winter recreation and grooming operations.

OSSA supports responsible multiple use of our National Forest System lands. Our purpose in submitting these comments is to ensure that an existing and established winter recreation program is recognized early in the planning process and that future geothermal development can be planned in a way that minimizes conflicts with snowmobile access and grooming operations.

The Newberry area is an important part of Central Oregon's snowmobile trail system. The La Pine Lodgepole Dodgers and their volunteers invest significant time and resources maintaining and grooming these trails for the public. OSSA wants to ensure that this investment, public

access, and the continuity of the groomed trail system are considered throughout this process and in any subsequent site-specific environmental review.

Please include OSSA and the La Pine Lodgepole Dodgers as interested parties for future notices, planning, and site-specific proposals associated with geothermal exploration or development that could affect the Newberry snowmobile trail system.

Thank you for considering the Oregon State Snowmobile Association's comments.

Sincerely,

Lisa Mahoney

Executive Director

Oregon State Snowmobile Association

Bend, Oregon