

The geothermal development proposed by Ormat Technologies Inc. (Ormat) in the small remote community of Gerlach in northwestern Nevada has the potential to cause significant long-term adverse impacts to the quality life and property in this unincorporated town home to less than 200 year round residents.

In the fall of 2020 Ormat submitted an Operations Plan to the Bureau of Land Management (BLM) to develop 2 large 24 megawatt geothermal electric generation facilities with accompanying infrastructure including an electrical substation, up to 21 wells clearing some 44 acres, 4.6 miles of above ground pipelines, 3.1 miles of new and improved access roads and 26 miles of new transmission lines. This Large scale industrial development is proposed on public land within sight and sound in Gerlach. Construction of these facilities and infrastructure would be larger than the town itself spanning some 4 - 5 miles or more along the foothills of the Granite Mountains less than ½ mile away. There are numerous springs adjacent to proposed wells and the geothermal resource underlies the town. These water resources as well as wetland wildlife habitats will be at risk of damage or drying up altogether. The historic Great Boiling Springs on private land, home to unique microbes, is just a few hundred feet from proposed wells.

BLM opened a public scoping comment period in October of 2020 for this project and received public comments. A few weeks later Ormat withdrew this development proposal.

Ormat then submitted to BLM a new “exploration” Operations Plan proposal in 2021 to drill up to 23 wells omitting the development of the power plants, pipelines and other infrastructure thus segmenting the project. By separating the well drilling from development of power generation facilities and infrastructure BLM did not take a hard look at the real impacts of full development of the project. Segmenting of a project into much smaller projects is a questionable action under National Environmental Policy Act (NEPA) requirements. BLM decided to complete an Environmental Assessment (EA) and only look at drilling up to 23 exploration wells. BLM issued a Finding of No Significant Impact (FONSI) decision in October 2022 allowing of up to 13 production and injection wells to be drilled. This EA is inadequate because it only looks at a piece of the project and does not have the in depth environmental, social and economic analysis required by an Environmental Impact Statement to show the true impacts that large scale industrial development would have on the community, the environment, the human environment, and the economy. The EA avoids analysis of cumulative impacts because it omits development of the geothermal power plants and extensive infrastructure as it stated in the FONSI, it is not part of a “reasonably foreseeable future action”.

Some of the exploration well sites are just a few hundred feet from springs and occupied private property. The 170 foot tall drill rigs will have flashing beacons on top visible for a great distance at night. The temporary impacts of well drilling could last 2 ½ years or longer. The 2,724 acre project Area of Interest (AOI) includes 475 acres of private property (35% of Gerlach) and comes within a few hundred feet of residences. The AOI contains habitat for mule deer,

antelope, predators, and other wildlife. There is habitat for eagle nesting and bighorn sheep lambing in the vicinity that are very sensitive to noise and disturbance. The AOI also includes part of the Granite Mountains special recreation management area as well as a portion that is proposed for wilderness designation. The AOI also contains a portion of the historic Nobels Trail.

It is estimated some 40,000 gallons of water per day per well site is required for the 45 days or more to drill each well plus several weeks for construction of roads and each 2 acre drill pad. Ormat will need to purchase water from an unknown source and haul this large amount of water to the drill site every day or they may have to drill additional water wells into the local aquifer and if so what are the environmental consequences of this action? There is no analysis of this scenario.

Consequently, a law suit has been filed against BLM and the Secretary of Interior in District Court for Nevada citing a failure to comply with NEPA, the Administrative Procedures Act as well as segmenting the project. The case is The Burning Man Project et al v. United States Department of the Interior et al, U.S. District Court for the District of Nevada, No. 3:23-cv-0013.

Gerlach is dependent upon and developing a tourism economy. Gerlach is the gateway community to the Black Rock Desert – High Rock Canyon Emigrant Trails National Conservation Area (NCA). The BLM Black Rock visitor center is located in the middle of the proposed industrial development. From Gerlach, visitors have access to millions of acres of public lands with a diversity of outdoor recreation opportunities and must drive through the proposed industrial development to get to the Black Rock Desert. Thousands of visitors travel here year round from all over the world to experience the vast open landscapes, the dark skies, engage in numerous outdoor activities & experiences or enjoy the quiet solitude in natural undeveloped landscapes in one of the most remote regions in the lower 48 states.

Several economic development plans and projects for tourism are in various stages of implementation for Gerlach including:

- The [Washoe County ArTrail](#) project is a driving tour that begins at a trailhead and art work in Verdi near Reno and extends through the Pyramid Lake Paiute Reservation with a proposed trailhead ending at Gerlach within a proposed Ormat well field development.
- An RV park is being developed next to Gerlach within the AOI next to proposed Ormat industrial development. People do not come here to camp with the sights and sounds of an industrial zone.
- Planning by the Washoe County Community Reinvestment Program and local residence is ongoing for a [Gerlach Community Trail](#) with an assistance grant from the National Park Service, Rivers and Trails Conservation Assistance Program. The trail will connect Gerlach with [Guru Road](#), a locally significant cultural art phenomena, connect with the

ArTrail and connect with a 100 acre art park. Part of this trail would pass through the AOI and within the proposed Ormat well field next to Guru Road.

- Planning is ongoing for grants to assess and fund shielding all the lights in Gerlach to protect dark skies and support astrotourism. Gerlach is [the darkest town in America](#)
- Friends of Black Rock High Rock (FBR) has received numerous grants from Travel Nevada and others over several years to accommodate local outdoor recreation and tourism. FBR has received new grants from Washoe County and the Department of Tourism and Cultural Affairs to aid in developing new interpretive guides, provide various kinds of guided trips, create new jobs, support new tourism entrepreneurship, promote heritage tourism as an economic driver, look at developing historic district(s) & become a Nevada Main Street Town through the National Trust for Historic Preservation, work with native American tribes to tell their stories, improve on existing conservation projects and outdoor & history educational programs, as well as continue with numerous annual events in Gerlach and the Black Rock Desert. FBR is also developing a "Black Rock Welcome Center" in Gerlach where they currently operate a visitor center.

The vast natural undeveloped landscapes, the dark skies, the quiet environment and unspoiled vistas are of extreme importance to Gerlach, extremely important to the quality of life here, extremely important to the economy, and the reason thousands of visitors travel here - to experience it for themselves.