

November 30, 2020

Via E-Mail [blm\_nv\_wdo\_gerlach\_geothermal@blm.gov]

Bureau of Land Management  
Attn: Mark E. Hall  
Field Manager  
Black Rock Field Office  
5100 E. Winnemucca Blvd.  
Winnemucca, NV 89445

Re: Pre-Scoping Comments of Concerned Stakeholders - Gerlach Geothermal  
Development Project

Dear Mr. Hall:

We are a group of concerned citizens, NGOs, and community representatives with significant interests related to the Town of Gerlach and the Black Rock Desert. We collectively submit these pre-scoping comments to the Bureau of Land Management (BLM) in regards to the Gerlach Geothermal Development Project submitted by Ormat Nevada, Inc. (Ormat) for an expanded geothermal plant and related transmission infrastructure to be located in the Black Rock Basin (the Project).<sup>1</sup> These initial comments highlight the need for a thorough review under NEPA. Because of the possibility of significant and controversial impacts, we believe a full environmental impact statement should be prepared. While we understand that a programmatic EIS from 2008 exists, this document is outdated and not sufficiently detailed to address the concerns of stakeholders.

The signatories of these comments are generally supportive of the expanded use of renewable energy sources in the resource mix for Northern Nevada, and geothermal resources are a viable source in the arid West. However, we also believe that adequate, consistent, and fair planning practices must be utilized in all projects of such importance in order to avoid unintended consequences. To coin a phrase, location is key. The Project proposes two approximately 20 megawatt (MW) energy

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<sup>1</sup> Ormat is in the approval process before Washoe County, and the Regional Planning Commission, for a similar project in the San Emidio Desert Basin. It is unclear whether an approval of the San Emidio project would impact Ormat's decision to proceed with this Project.

generation facilities, ancillary facilities including a substation, and transmission line interconnection, on an area of disturbed ground of approximately 163 acres. The Project proposes the installation of twenty-three production and injection wells associated with the utility plants.<sup>2</sup> Each of the twenty-three well pads takes over 4 acres of land. See Utilization Plan, December 2019, at 2 - 4. Ormat states that the “project is remotely located and would not likely cause hazards to public health and safety.” *Id.* at 13. This is not accurate. The Project site is approximately one mile outside of Gerlach proper, and even closer to individual homes of Gerlach residents. *Id.* at 20. Our understanding from Ormat representatives is that the geothermal resources slated to be used by the Project are extracted from the Black Rock Basin, and possibly the Smoke Creek Basin at depths of 2,000 to 5,000 feet, wherein waters have a high mineral content. Any risk of drawing this water into the aquifer that serves as drinking water for Gerlach is of great concern.

We find the following concerns with the Project based upon the information currently provided:

- 1. National Conservation Area.** On December 21, 2000, the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area Act of 2000 was signed into law. This important piece of legislation was decades in the making, and takes into account multiple uses and attributes therein that provide economic stability, cultural resource preservation, and significant habitat. The location of the Project so near to the NCA is one of significant concern, as further identified in each of the following numbered paragraphs.
- 2. Wilderness.** In 2008, significant public acquisitions in the area greatly enhanced wilderness integrity, minimizing conflicts, and allowing management to enhance habitat, and as a direct result, BLM officially inventoried the Granite Range for Wilderness and found that two units qualified. That included the Granite Range unit (42,700 acres and the Buckhorn Peak Unit at 23,400 acres). The Project is in direct conflict with the eastern portion of this Wilderness Character Unit. Additionally, the Project directly conflicts with a formal Wilderness proposal submitted to the Nevada delegation as part of the Washoe County/Truckee Meadows Public Lands bill process pending in Washoe County for the past several years.

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<sup>2</sup> We understand that representatives from Ormat gave comments before the Gerlach General Improvement District that the Project will be reduced in scope to one of the installation of exploration wells, without the associated utility facilities. No formal notification of this position has been released to our knowledge.

3. **Rural Economy.** From the initial information provided as to the Project, it appears that economic benefits to the Town of Gerlach and surrounding residents will be minimal, and possibly counterproductive. While all customers of NV Energy may receive some benefit from additional renewable resources coming on line, that is the extent of the benefit to the local community. There is no influx of local jobs, nor any ability to house such workers were there ever to be.

Unintended consequences of the Project could also negatively impact businesses and landowners. Geothermal development in this proposed location has the potential for significant impacts by altering or stopping existing surface springs from functioning. For example, if the Great Boiling Springs, located on private land, reduce or cease functioning, this would adversely impact the Black Rock Mud Company that relies upon its proper function.

Moreover, Gerlach's economy significantly benefits from the tens of thousands of visitors from around the world who travel to this region year-round to experience the solitude of the vast open spaces and undeveloped vistas present in the Black Rock Desert as well as attend numerous events and pursue a variety of recreation experiences. The location of the Project within this view shed would negatively impact the experience of these tourists, and thus the vibrant tourism industry of Gerlach.

4. **Recreation.** The Project overlaps a significant portion of the Granite Foothills Recreation Management Zone. The RMZ plan recognizes that *"national or regional visitors and constituents value the surrounding public lands as a recreation/tourism opportunity."* This plan also directs that any facilities in this area *"will be developed, located and designed in such a way as to be consistent with preserving the character of the adjacent Black Rock Desert High Rock Canyon Emigrant Trails National Conservation Area."* The Project will impact these identified recreational management objectives for Zone 1. The BLM should do a detailed study to identify the scale of the project impact on the identified recreation values and on the socio-economic impact on regional tourism.

The 2015 Resource Management Plan for the Winnemucca District Planning Area also identifies *"a site of 'Americana Art' known as 'Doobie Lane' or Guru Road,"* which is entirely within the proposed footprint of the Proposed Gerlach Geothermal Development Project. BLM has granted a right of way over Guru to protect this unique cultural feature of great importance to Gerlach. It should remain protected from development and disturbance. We understand that the Project may have been adjusted to avoid impacts to Guru Road; however, no official amended document has been provided to date.

- 5. Habitat.** The Project impacts important wildlife habitat in a number of ways. First, the Project overlaps Occupied Bighorn Sheep Habitat as identified in the 2015 Resource Management Plan for the Winnemucca District Planning Area (see map below).

If geothermal development decreases flow from springs hydrologically connected to the Project's geothermal resource, there will be impacts to wetland habitat created by the springs. Wetlands in the desert are biodiversity hotspots, providing habitat for invertebrates, fish, resident and migratory birds, and a vital water source for larger terrestrial wildlife. The BLM should analyze in detail the potential changes in flow due to geothermal development to all potentially connected springs, and what the ecological consequences of such changes would be.

- 6. Dark Skies.** In an era of ever increasing urbanization and development, Dark Skies are becoming a rapidly diminishing resource. This has led to an exponential growth in the awareness of the values of preserving Dark Sky landscapes and in the growth of Astro Tourism. Currently, Gerlach is a gateway community to the Dark Sky resources of the Black Rock High Rock NCA and the Massacre Rim WSA/ Dark Sky Sanctuary. This area is a popular viewing spot for people to view meteor showers, including the Perseids in August, and the Leonids in November. The BLM should conduct a detailed study of the light pollution of the Project and how it will impact the dark sky brightness and interfere with opportunities for Astro Tourism and star gazing.
- 7. Cultural Resources.** In addition to Guru Road mentioned above, the historic Nobels Trail and the exploration route of John C Fremont lie directly adjacent to the Project's proposed location. There must be a thorough archeological survey of all prehistoric and historic resources located in the area.
- 8. Noise Pollution.** With the Project located within a mile of Gerlach residences, it is critical that a Noise Analysis be completed through the NEPA process to identify the impacts to residents of round-the-clock noise from the Project. The constant noise associated with exploration and production wells may also be significantly disruptive to the serenity of public land users in the nearby National Conservation Area.
- 9. Hydrology.** The Project area lies along the northeast trend of the Black Rock Geothermal area which includes many important hot springs resources. Geothermal development frequently causes substantial changes in the flow rates and flow paths in hydro geothermal systems which could alter existing surface flows at springs in the area. The BLM should do a detailed study of the

connections among hot springs all along the trend noted above to estimate impacts, and set mitigation measures if appropriate. BLM should analyze the impact of development of geothermal resources on springs discharging from shallow groundwater systems. Impacts could occur if development changes the vertical gradient and causes water to flow downward from shallow groundwater significantly faster than currently occurs. Impacts may occur in future, but they should still be identified.

**10. Groundwater Contamination.** Groundwater contamination is possible, even in a closed loop geothermal system, should that system fail. Ormat's Utilization Plan dated December 2019, includes a Spill or Discharge Plan that only appears to address spills or discharges to the surface of the ground. There is no plan as to what processes should be implemented should there be an unlawful discharge to groundwater. Any resulting regulatory obligation of Ormat should include a spill and discharge plan that specifically addresses groundwater contamination, and includes immediate notification to contiguous landowners, and the community of Gerlach through the Gerlach General Improvement District.

**11. Net Energy Analysis.** As part of the NEPA analysis, the BLM should conduct a Net Energy Analysis comparing the energy input with energy outputs for the Project.

**12. Transportation Analysis.** Increased traffic of heavy vehicles on State Route 447 could lead to an increased deterioration of the road surface. Analysis and consultation with Washoe County Roads Department is needed to determine if the roadway rating and the Roads Department's maintenance schedule are adequate for the transportation needs of this project.

Anyone who's ever driven along the roads in northern Washoe County near Gerlach have surely gazed in awe of the legendary landmark mountain massif called the Granite Range. Granite Peak leaps skyward some five thousand feet from the valley floor to the highest rampart. Granite Peak, at nearly 9,000 feet, is the highest point of this range which is also graced by the natural and historic landmark called "the Banjo". This range is often covered with snow year-round and it is one of the most revered mountain ranges in all of Nevada. Each of the signatories of these pre-scoping

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comments seek to ensure that this historic and coveted area is fully protected. We thank you for considering these important issues.

**On behalf of Friends of the Black Rock High Rock:**



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**On behalf of the Burning Man Project:**

/s/ *Lina Tanner*

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**On behalf of the Center for Biological Diversity:**



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**On behalf of the Conservation Lands Foundation:**

/s/ *Bertha Gutierrez*

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**On behalf of Friends of Nevada Wilderness:**

/s/ *Shaaron Netherton*

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**On behalf of the Gerlach General Improvement District:**



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