

TO: Washoe County Planning Commission
Hon. Larry E. Chesney, Chairman

FROM: Burning Man Project
Lina Tanner, Senior Advisor, Government Affairs

RE: WSUP20-0013 Ormat Geothermal North Valley Project

DATE: August 31, 2020

The Burning Man Project (BMP) submits these comments in regards to the Special Use Permit (SUP) submitted by ORNI 36 LLC (Ormat) for an expanded geothermal plant and related transmission infrastructure to be located in the San Emidio Desert Basin, and to include federal geothermal leases within public and private leased lands (the Project).

BMP is generally supportive of the expanded use of renewable energy sources in the resource mix for Northern Nevada. However, BMP also believes that adequate and fair planning practices must be implemented in order to avoid unintended consequences of moving forward with a project without the completion of adequate studies to determine the interconnection of the geothermal resources in the area's basins. The concerns stated in BMP's comments today echo the concerns expressed by the Pyramid Lake Paiute Tribe (the Tribe) before this Commission and before the Bureau of Land Management in the NEPA scoping process as to the approval of this Project prior to conducting a full environmental impact statement (EIS).

BMP is also a landowner in close proximity to the Project. As such, the connectivity of the geothermal resources of the San Emidio Desert Basin with those of the basins throughout the region should be addressed prior to approval of the Project. The BLM issued a Draft Environmental Assessment dated May, 2020 (the DEA). Within the DEA, the BLM notes the preferred alternative (to allow the Project) was the only alternative offered. This is not accurate. Both the Tribe and Western Watersheds Project advocated for a full EIS before making a recommendation to proceed with the Project. The Tribe also submitted its own technical memorandum to the BLM indicating evidence of connectivity of the geothermal resources in the neighboring basins, and as such, it is in conflict with the DEA. The DEA does not appear to adequately address these conflicts. The Tribe suggests that the BLM require Ormat to conduct "an investigation,

including pump tests, hydrological modeling, temperature analysis, among other research, to quantify the Project's impacts—both from withdrawal and reinjection—on the Tribe's federal reserved groundwater rights within the San Emidio Basin, and within other adjacent areas. This investigation should include an analysis of impacts to both the Tribe's geothermal resources and impacts to groundwater in the alluvium." BMP agrees. Such a study would likely reveal potential impacts to BMP's parcels lying near the Project area.

The San Emidio Desert Basin has been designated by the Nevada Division of Water Resources (NDWR) due to existing, and severe, exceedence of the perennial yield. Further study of the risks associated with hydrologically connected basins and surface waters, and the ten-fold increase in groundwater pumping proposed by the Project would give the Planning Commission a better understanding of the Project's impacts, and whether the Planning Commission can affirmatively find that the issuance of SUP to the Project (a) "will not be detrimental to public health, safety or welfare; injurious to property or improvements of adjacent properties or detrimental to the character of the surrounding area;" and (b) "that the project is not unduly detrimental to surrounding properties, land uses, and the environment in general." Washoe County Code 110.810.30.

Thank you for allowing the opportunity for the BMP to submit this comment on this important issue.