

Susan Elliott, Project Lead
660 South 12th Street Suite 108
Elko, Nevada 89801

October 23, 2017



FRIENDS of NEVADA WILDERNESS

RE: Comments on the Ruby Oil and Gas Leasing in the Ruby Mountains Ranger District

Dear Ms. Elliott:

Over 30 years ago Friends of Nevada Wilderness was instrumental in the protection of the Ruby Mountains as Wilderness. Since then we have worked in partnership with the Forest Service on projects to help protect Greater Sage-grouse habitat, ensure hiking trails are well maintained, restore wildlife habitat by pulling fence, invasive weeds, planting seedlings after fires, etc.

The Ruby Mountains both inside of Wilderness and outside of Wilderness are exceedingly loved by our members. We have many members who enjoy hiking, hunting, fishing, camping, wildlife watching, star gazing, photographing natural landscapes, painting, and just plain exploring the wonderful backcountry and roadless areas within Ruby Mountains. Oil and gas leasing is totally incompatible with the significant Wilderness values and wildlife habitat found here. On behalf of our Friends of Nevada Wilderness members, Board of Directors and staff we submit these comments.

The proposed oil and gas leases within the Ruby Mountains threaten important wildlife habitat, sensitive ecological systems, cultural resources, lands important to local tribes, and areas with some of the highest value recreational resources in northern Nevada. Additionally, these proposed leases overlap with and threaten roadless inventory areas that have been advocated for protection for over 40 years and have been protected as roadless areas for years.

Three of these roadless areas, (03-21C) Ruby-Seitz, (03-26) Ruby Smith-Creek, and (03-26A) Ruby-South, were identified as having wilderness characteristics in the 1980's and were initially part of the proposed Ruby Mountain Wilderness. As contiguous portions of the Ruby Mountain Wilderness, these units have been recommended as additions to the wilderness multiple times including most recently in Friends of Nevada Wilderness comments submitted during scoping for the Humboldt-Toiyabe Forest Plan Revision-Wilderness Assessment in 2007 (this revision never happened). The proposed oil and gas leases overlap with and threaten the integrity of approximately 7,500 acres of these three contiguous roadless areas.

South of Harrison Pass, the proposed oil and gas leases overlap with nearly 11,000 acres of the Pearl Peak (05-27) Roadless Area. This exceptional area has been advocated for wilderness protection since the 1970's and it has outstanding wilderness values. Most recently, Pearl Peak was also recommended for wilderness protection in 2007 Friends of Nevada Wilderness

comments submitted during scoping for the Humboldt-Toiyabe Forest Plan Revision-Wilderness Assessment in 2007.

In 2012, both the Ruby Mountain Wilderness additions and the Pearl Peak roadless area were included in a formal appeal of the Record of Decision as the regional travel management plan did not provide enough protection for roadless areas within the District. Approval of oil and gas leases would likewise also threaten the ecological integrity and wilderness potential of these protected roadless areas.

The proposal to lease 54,000 acres of the Ruby Mountains for oil and gas exploration and development is frankly absurd. The Ruby Mountains are characterized by high, multi-faceted, granite-like peaks soaring above lush green meadows and sparkling sapphire blue lakes. The "rubies" of the mountains' name are actually garnets, red semiprecious stones found in certain metamorphic rocks. Long and narrow, the Rubies stretch 100 miles and seldom get more than 10 miles wide. Nowhere else in Nevada is there such a spectacular landscape, with hanging valleys, clusters of lakes and snow-fed streams flowing down the U-shaped glacial valleys on the west side of the range. Because they were so heavily glaciated and have such abundant water, the Rubies represent the best, classic-mountain ecosystem in Nevada. The Pearl Peak roadless area is characterized by 10,847 foot Pearl peak in the in the heart of the area.

As a management agency for America's public lands, it is the obligation of the Humboldt-Toiyabe National Forests to consider the best and most sustainable use of these resources for the American people, not for a handful of special interests. The visitor statistics alone for the Ruby Mountains speak for themselves. The Ruby Mountains Heliski operation is world-class. The geological, geographical, ecological, and wildlife resources are outstanding including, American pika, yellow-bellied marmot, mule deer, Rocky Mountain bighorn, mountain goat, Lahontan cutthroat trout, Black Rosy Finch, Brewer's Sparrow, Lewis' Woodpecker, Pinyon Jay, Greater Sage-Grouse, Blue Grouse, Golden Eagle, Northern Goshawk, Sharp-shinned Hawk and Prairie Falcon. The Pearl Peak portion of the proposed lease includes wildlife species such as Blue Grouse, Northern Saw-whet Owl, Flammulated Owl, Pine Siskin, Clark's Nutcracker, Western Tanager, Cedar Waxwing, Black-throated Gray Warbler, Ruby-crowned Kinglet, Red-breasted Nuthatch, Williamson's Sapsucker, Golden-crowned Kinglet, Rock Squirrel, and Steller's Jay.

The limestone geology in this area is host to 400 million-year-old fossils and solution caves that support bat populations including long-legged myotis, long-eared myotis, and California myotis. This area supports the largest contiguous high elevation block of bristlecone pine / limber pine / white bark pine / curlleaf mountain mahogany / dwarf juniper subalpine coniferous forest wilderness in the Great Basin.

Friends of Nevada Wilderness strongly encourages the Humboldt-Toiyabe office to find these 54,000 acres of the Ruby Mountains unsuitable for oil and gas leases as it would be contrary to the management of the Ruby Mountains for ecological integrity and recreational use.

If any plans move forward to issue leases in Ruby Mountains, the Humboldt-Toiyabe National Forest should consider revising the Forest Plan since the current management information for the Ruby Mountains is out-of date and was written well before the contemporary exploration and

extraction techniques were developed. A statement requiring No Surface Occupancy (NSO) is not sufficient for permitting these lease sales to move forward. At a minimum, the district must create an Environmental Impact Statement (EIS) to address the complete range of impacts of activities such as directional drilling and fracking on the area's unique hydrological systems and geological structures including the extensive fault systems and any limestone karst systems in the area.

In summary, any leasing in the Ruby Mountains is a bad idea and the Forest Service should reject the leasing proposal.

Sincerely,



Shaaron Netherton
Executive Director
Friends of Nevada Wilderness