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Josh Nicholes, Acting District Ranger
Humboldt-Toiyabe National Forest
660 South 12th St. #108
Elko, NV 89801

E-mail: comments-intermtn-humboldt-toiyabe-mntcith@fs.fed.us

Re: scoping comments on the proposed Ruby Mountains Oil and Gas Leasing Availability Analysis Project

Dear Ranger Nicholes,

Thank you for providing the opportunity to comment on the Ruby Oil and Gas Project. I am a Nevada resident and frequent visitor to the Ruby Mountains for its outstanding scenic and recreational treasures for many decades.

As you have heard from over 10,000 people from Nevada and all over this country who also highly value the Ruby Mountains, this proposal, if approved and implemented, would have significant adverse impacts on these National Forest lands and resources. These impacts would harm: soils; water quantity, water quality, and water supplies; air quality; wilderness; vegetation; cultural and paleontological resources; riparian areas; alpine areas; forest and range ecosystem health; threatened, endangered, and sensitive species; local socioeconomics; scenic values; Pearl Peak and Seitz Canyon/Echo Lake Natural Research Areas; recreation; and wildlife (Greater Sage Grouse, Lahontan Cutthroat Trout, and the largest mule deer population in the State of Nevada). These outstanding mountain lands would have been designated a National Park or a National Recreation Area long ago, in any other state. See: https://elkodaily.com/look-the-splendor-of-the-ruby-mountains/collection_f48d7f1b-51df-56c4-b7a4-4fee6243eedf.html#27

In Nevada, we are depending on the US Forest Service for the protection and management which the Ruby Mountains deserve. Because some National Forest lands which are being requested in this oil and gas project are adjacent to the Ruby Lakes National Wildlife Refuge, we also are depending on the US Forest Service to protect the neighboring Refuge lands from any direct or indirect impacts from this proposed oil and gas leasing project.

And, as you have also heard from many federal and state agencies, there is very little likelihood of oil and gas in the Ruby Mountains, due to its metamorphic geology. Nor is there much of a demand for oil at this time due to flooded markets.

As part of the scoping comments for the Environmental Assessment (EA), please study the impacts of the proposed project on all forest lands and resources. Alternatives in the USFS EA should include No Action, leasing the entire requested 54,000 acres, and one or more alternatives to lease only portions of the requested total acres.

For the latter alternatives, I strongly recommend the following:

1. Exclusions: Exclude from any availability for leasing the 30,169 acres of priority Habitat Management Areas (PHMA). Also, exclude from any availability for leasing the 15,875 acres of General Habitat Management Areas (GHMAs) where other critical wildlife habitats are also located, including Mule Deer summer and winter ranges and migration corridors, and all streams occupied by threatened Lahontan Cutthroat Trout or streams being restored as part of the LCT recovery plan.

2. Exclusion: Exclude from any availability for leasing all parcels where oil and gas operations would have any adverse impacts on the Ruby Lakes National Wildlife Refuge.

3. Greater Sage Grouse protections: In any National Forest lands which are leased which may have Greater Sage Grouse populations or habitats, require stipulations in the Nevada and Northeastern California Approved Resource Management Plan Amendment (ARMPA) - Table 1. For any parcels within a 4-mile buffer of active or pending leks, require timing restrictions on all oil and gas activities from March 1 to May 15 each year, consistent with ARMPA. Also, for any parcels with Greater Sage Grouse, please require No Surface Occupancy, consistent with ARMPA stipulations. For any parcels with winter habitat, please require timing restrictions of November 1 - February 29, each year, consistent with ARMPA. And for parcels which are leased within GMHAs and which have brood-rearing habitat, please restrict oil and gas activities from June 15 to September 15, each year, consistent with ARMPA. I endorse all other specific recommendations by the Nevada Department of Wildlife for stipulations to protect Greater Sage Grouse and its habitat in each parcel which is actually leased. Also, require Best Management Practices on any leased Forest lands, consistent with ARMPA.

4. Mitigation and Compensation: Please first require avoidance of impacts to the National Forest lands and resources by oil and gas operations. If impacts cannot be avoided, then require full mitigation and compensation for all oil and gas operation impacts.

5. Restoration Bond: Please require a bond sufficient for the full restoration of all national forest lands damaged by any oil and gas operations.

In conclusion, I believe that the US Forest Service has both the authority and the responsibility to protect the nationally important National Forest lands and resources in the Ruby Mountains from the adverse environmental impacts of the proposed oil and gas project.

Thank you for considering my comments. Please keep me informed of USFS actions on the Ruby Oil and Gas.

Sincerely,

Rose Strickland /s/

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