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Organization: Sagebrush Ecosystem Program/Technical Team  
Title:  
Comments: Ruby Oil and Gas

Good afternoon Ms. Elliott,

We appreciate the opportunity to be able to provide comment. Please find attached our comments on the proposed Ruby Oil and Gas lease. If you have any questions or require further explanation on our comments, please feel free to contact me.

Thank you,

Kelly

Mr. Kelly McGowan, CPM

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The Sagebrush Ecosystem Technical Team (SETT) has reviewed the scoping documents and information concerning the 54,000 acres of National Forest Lands that are being analyzed for oil and gas leasing. The SETT has concerns regarding some of the oil and gas leasing parcels that may significantly impact greater sage-grouse nesting and brood-rearing habitat. A significant portion of the proposed oil and gas leasing occur within Priority (59%) and General (31%) Habitat Management Categories. In addition, 57% of the proposed footprint falls within a 6 km buffer of 9 leks that occur along the western foothills of the Ruby Mountains. The majority of sage-grouse breeding habitat generally occurs within 6 km of a lek, and disturbance in these areas may have negative impacts to the local populations.

In addition to potentially affecting sage-grouse populations during spring from possible construction and operation of proposed activities, sage-grouse are using high elevation habitat in the Ruby Mountains. Specifically, the multitude of streams, ephemeral seeps and springs that occur north of Sherman Creek and Harrison Pass are important late brood-rearing habitat. Late brood-rearing habitats are typically considered the most limiting seasonal habitat for sage-grouse in Nevada, and every effort should be made to conserve these critical areas to maintain populations. Sage-grouse nest in both Huntington Valley and in the Ruby Mountains, but by late summer most grouse within this region congregate and are utilizing these upper elevation areas. We urge that careful consideration is given for those parcels that fall within close proximity (6 km) to leks and also near riparian areas, and lentic and lotic meadows at higher elevations in the Ruby Mountains to prevent additional risk to local sage-grouse populations.