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First name: Katie

Last name: Fite

Organization: WildLands Defense

Title:

Comments: Ruby Mountain Oil and Gas Leasing

Dear Humboldt-Toiyabe Forest,

Here are initial comments from WildLands Defense on the Ruby Mountain Oil and Gas leasing proposal. The Forest proposal states:

The Humboldt-Toiyabe National Forest's Mountain City-Ruby Mountains-Jarbridge Ranger District is analyzing a proposal to make approximately 54,000 acres of oil and gas available for leasing in the Ruby Mountains and is seeking public input on the proposed project.

This is a massive and highly controversial project. If leases are developed, tracking and extensive depletion of ground and surface waters is likely.

The Ruby Mountains are a highly scenic wild lands area, with Wilderness and other values that will be significantly harmed by leasing, exploration, development. They are also a narrow mountain range, and the mapping shows proposed leasing of a whole township or more - nearly spanning the entire range. Oil and Gas activity will destroy wild lands values, primitive and unconfined recreation, natural values, solitude, and a wealth of other values of the affected landscape.

The Forest also states: "The NFS lands being considered for oil and gas leasing are located south of Lamoille Creek and North of Sherman Creek, on the west side of the Ruby Mountains. These lands are within areas covered by the 1986 Humboldt Land and Resource Management Plan, and all are designated as open to leasing. The Nevada BLM is a cooperating agency on this National Environmental Policy Act (NEPA) analysis". We are greatly concerned about the role of Elko BLM in this scheme.

The Forest has failed to provide sufficient information to allow meaningful public scoping comments. All the public is provided with is a section grid map, and the acreage proposed for leasing - which is immense. The acreage size proposed for leasing alone necessitates an EIS be prepared. There is no information on the watersheds, sensitive and imperiled species ranging from sage-grouse to pygmy rabbit to Columbia spotted frog big game habitats and populations (mule deer, bighorn sheep, elk, antelope) aquifer stresses and/or declines, other oil and gas leasing on BLM and/or Forest lands, or a host of other information necessary to allow the public to properly comment. The BLM is undertaking massive leasing across Nevada - with no real reason provided. There are already many leases not being developed. See:

https://www.blm.gov/sites/blm.gov/files/uploads/NV_OG_20170614_BMDO_Sale_Notice_0.pdf

I recall previously commenting on Oil and Gas leasing in the mid-2000s here. At that time, it is not clear if the Forest leased any acres, and if it did lease some if I recall correctly there was no Surface Occupancy. Please detail all past leasing schemes and Forest and BLM actions regarding them in this landscape.

The Scoping Notice fails to provide mapping and data of all currently leased acres on BLM, Forest, private or Indian Reservation lands in the area. Full and detailed analysis of leased acres, sites where drilling and/or oil production have taken place, sites where wells have been drilled, etc. must be fully provided. All direct, indirect

and cumulative effects of existing leasing and Oil/Gas explo, development, etc. must be fully provided.

Large areas of Nevada face large-scale water over-allocation and plummeting ground water supplies. Full and detailed studies of all surface and sub-surface water systems must be prepared as part of this process. What effects is the massive aquifer drawdown cone of depression from Carlin Trend, and other mining having on the area?

What effects is climate change stress having on the area's waters? ON sensitive species? What will be the direct, indirect and cumulative effects of this massive OG scheme in making matters worse/exacerbating climate change effects?

What are the predicted effects of climate stress on ground and surface waters?

Who holds water rights in the area of impact of any potential explo or leasing scheme?

What effect might SNWA or other aquifer mining or water peeping schemes have on availability of ground and surface waters?

Isn't every drop of water already allocated across Nevada? How ill there eve water to drill explo wells? How can NV afford water wasted, polluted and fouled in tracking and/or re-injecton?

Isn;t his an area of geological instability? What are the earthquake risk? Won;t tracking/re-injection greatly increase such risk? Please provide detailed mapping and analysis of geology and risk.
How will explo activity impact the integrity of ground and surface water divisions?

Pleas conduct a comprehensive feasibility study of development potential.

How does the agency determine that speculators are not acquiring these parcels?

We are also greatly concerned about the cumulative adverse effects of this large-scale vegetation treatment disturbances that have taken place and are taking place in this landscape. They represent a tremendous loss of habitat for migratory birds, big game and other vital wildlife species.

Large areas of the project site undergo large-scale and severe livestock grazing disturbance by cows and/or sheep.

Please provide full and detailed analysis of the direct indirect and cumulative effects of the treatment and grazing disturbances affecting the resource values (sensitive species, waters, watersheds, etc.) impacted by OG activity under this proposal.

Please provide detailed mapping and analysis of mining claims and geothermal leases in and surrounding the project area. How might development of mines, geothermal, etc. amplify the adverse effects of OG activity - such as further losses of water, loss and fragmentation of wildlife habitat, etc.?

Please provide detailed analysis of the current status and full baseline on the ground surveys and inventories of all habits and populations of important, sensitive and rare/imperiled BLM and USFWS species.

We have many more concerns, and will provide addition comments. We believe the project must be re-scoped with much more extensive information provided on the environmental baseline for all elements of the environment.

Thank you,

Katie Fite
Public Lands Director
WildLands Defense
PO Box 125
Boise, ID 83701
208-871-5738