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Organization: Backcountry Hunters and Anglers

Title:

Comments: Ruby oil and gas

October 31, 2017

Susan Elliott, Program Manager

Mountain City, Ruby Mountains & Jarbidge Ranger District

Dear Ms. Elliott,

The Nevada Chapter of Backcountry Hunters and Anglers (NV BHA) has a deep interest in and grave concerns regarding the proposed oil & gas leasing by BLM within areas surrounding the Ruby Mountains. Any public notice of a proposed action within or surrounding these beloved iconic Nevada mountains are an immediate red flag for investigation by any outdoor enthusiast, including all our NV BHA members. These mountains are the epitome of an alpine ecosystem, rare in NV. The visitor statistics are some of the highest in Nevada.

The areas within and around the Rubies encompass possibly the highest scenic, tourist, recreation, cultural, wildlife and water resources in our state. The economic value they subsequently bring both to the state and the local communities are substantial. Some of our NV BHA members are outfitter/guides and ranchers who depend upon the health of these areas for their livelihoods. Nearly all our members have recreated here for hunting, fishing, backpacking, camping, photography, bird-watching, to name a few of our outdoor activities. The substantial outdoor industry in general has a vested interest in retaining the recreational value of this area, contributing in turn to state and local economies.

Our organization exists in large part to advocate for, conserve and/or restore large intact wildlife habitat. These are the key areas to maintain healthy wildlife populations and thus provide quality opportunities to hunters and fishers. The areas surrounding the Ruby Mountains are a prime example of such highly important wildlife habitat. Statewide, mule deer populations have decreased, sage grouse populations are under threat of listing by USFWS and the Lahontan Cutthroat Trout is listed as threatened. This area is of critical import to all 3 of these valuable species, thus any potential negative impact to habitat is of grave concern. Our members rank this area as one of their all-time favorite NV places to both fish and hunt.

Mule deer:

The potential lease areas encompass part of the mule deer winter range of highest population densities in NV, making it an absolutely crucial area. Migratory corridors and transition ranges are within the lease offerings. This herd is the largest in the state and, as such, the most valuable, especially at a time when mule deer numbers are in decline. This trend is a serious concern to sportsmen and all who care about the wildlife of NV.

Sage grouse (SG):

The areas of potential leasing include both Primary (PHMA) & General (GHMA) habitat management areas. Various seasonal habitats could be compromised by leasing. The lease proposal areas include the Green Mountain lek, situated on the Green Mountain bench, which is the key lek in Elko County for monitoring population trend. The entire bench is itself critical SG habitat. Leasing could additionally have potential negative impacts to the Huntington Valley bench, another key SG habitat area, serving also as a connector to important

habitat southeast to Sulpher Springs Mountain.

Lahontan Cutthroat Trout (LCT):

Over a dozen streams where LCT are in recovery management, key to achieving de-listing, could be impacted. For recovery purposes, streams which have been historically occupied are also important. Many entities: Federal, state and private, have expended substantial labor, money and time in recovery efforts. The Rubies, and the streams flowing down from them, are legendary as some of the best fly-fishing in the entire state, a state in which fly-fishing is a rare opportunity. Thus, every stream, LCT or not, is of great value.

USFS Inventoried Roadless Areas (IRAs):

The proposed lease areas overlap with a substantial amount of IRA acreage: nearly 17,000 acres could potentially be impacted. Conserving the roadless quality of IRAs is key to retaining healthy, unfragmented wildlife habitat. IRAs provide both escape and relief from motor disturbance which tends to disburse mule deer and sage grouse. These areas have been protected for 4 decades. 3 IRA units have been proposed as an addition to the Ruby Mountain Wilderness and Pearl Peak IRA as an additional Wilderness area. Many, if not most, of our members value the challenge, quality and solitude of a traditional Wilderness hunting or fishing experience. These areas are the very landscapes BHA values highest.

Water resources:

We are aware that research on potential hydrological degradation by fracking impacts is still in progress, but remains a concern. Pearl Peak just south of the Rubies, and on whose flanks are proposed lease units, are of limestone composition. Limestone, being of porous nature, triggers concerns that fracturing could potentially lead to contamination of waters that flow from the mountain and/or to ground water. Any potential for contamination of waters feeding into the Ruby Marshes or Ruby Lake National Wildlife Refuge, famous for fisheries and waterfowl, would be of grave concern. Again, these are areas beloved of not only our NV BHA members, but other sportsmen, birders, photographers from all parts of the nation and world.

For all the above reasons, NV BHA concludes that oil and gas leasing in the Ruby Mountains area is incompatible with the tremendous wildlife, recreational, cultural, hunting/fishing, Wilderness values and opportunities offered and enjoyed for generations of Nevadans and visitors from afar. We are certain that more appropriate leasing opportunity locations can be found within Elko County which could avoid such high value wildlife habitat while retaining multiple use standards.

If it is determined to go ahead with this leasing proposal, we ask for 3 considerations:

- 1.) The Elko District Management Plan is over 30 years old, written before evolution of current fracking methods. The plan should be revised before a decision can be fully analyzed.
- 2.) Although a No Surface Occupancy (NSO) is a helpful restriction, it does not preclude potential harm to adjacent parcels and/or hydrologic impacts.
- 3.) This proposal is of sufficient controversy to necessitate an Environmental Impact Statement (EIS) to evaluate the wide range of potential impacts on recreation, wildlife, habitat and hydrology.

With this valuable area at stake and applying the highest, best, long-term beneficial use adage, NV BHA urges you "to just say no" to this unwise leasing proposal for an area so completely inappropriate for such a use.

Thank you for your consideration of these comments,

Karen Boeger

Backcountry Hunters & Anglers, NV Chapter

PS. With my BHA hat off, the following is my personal anecdote, chosen from many precious memories of exploring the Rubies, illustrating a tiny insight to what these mountains mean to me personally:

The Rubies have been at the top of the list of family favorite mule deer hunting locales and we went there often. Coming home with a harvested animal was only "icing on the cake", if it happened, because simply to spend time up in the rugged splendor of those mountains was gift enough. It was a gift earned by sweat of carrying our "home" on our backs and later, in our "golden years", on the backs of our 2 burros.

At this very time of year, 7 Falls ago, my late husband, Dan Heinz, and I spent 5 days high in the Rubies on what was to be his last mule deer hunt and our last hunt together. The weather, angle of light and Fall color were glorious. The nights appropriately chill and stars brilliant. As a muzzle-loader hunter, Dan appreciated that he gave his prey a degree of advantage. Sure enough, though executing a few exciting stalks on a handsome buck, fate decided there be no Ruby Mountain venison in our freezer that year. No matter, we treasured that precious gem of a memory of that glorious hunt. How blessed we were for the opportunity to experience and meet the challenge those iconic mountains provide. We felt lucky to be Nevadans with the wealth of world class opportunity our very own Rubies represent.