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Organization:

Title:

Comments: To: Mr. Josh Nicholes

USDA U.S. Forest Service

Humboldt-Toiyabe National Forest

660 South 12th Street Suite 108

Elko, Nevada 89801

Subject: Ruby Mountains Oil and Gas Availability Analysis Comments

April 9, 2018

Dear Mr. Nicholes:

I am a retired BLM Soil Scientist with more than 30 years of experience in working with Nevada's public lands and natural resources

As a federal employee, environmental consultant/company owner, and research associate/lecturer at the University of Nevada/Reno, I compiled a comprehensive background in analyzing and evaluating Nevada's natural resources and environmental issues.

As a Nevada resident, for more than 50 years, I have immensely enjoyed recreating on our public lands, including the magnificent Ruby Mountains and adjacent Ruby Lake National Wildlife Refuge.

Nevada contains 314 major, north/south trending mountain ranges, none of which, I believe, can compare with the beautiful, inspiring, wild and biologically diverse Ruby Mountain Range.

Under the current circumstances, I am compelled to speak out now concerning the proposed Ruby Mountains oil and gas leasing.

With more than 80% of lands within Nevada being public, it makes no logical or practical sense at all that the government is even considering leasing 54,000 acres of some of the most pristine, undeveloped wildlands to oil

and gas development. There are many other locations, which have already been significantly disturbed, such as Railroad Valley, which would be much more feasible to consider.

This proposal is even more ludicrous when we know that it is nothing more than a political ploy by the chaotic and anti-environment Trump Administration to appease the fossil fuel industry and their billionaire oil friends.

During my entire professional career in Nevada, I have never seen such a direct attack on our public lands and their resources by our politicians in congress and the administration. They are attempting to literally give away and open up millions of acres of our wonderful public lands to the oil, natural gas, mineral and timber industries. Without any regard for the devastation and environmental catastrophies which will result. Not to mention the closing off of access to these lands to the general public.

And this is all occurring at a time when the nation's oil and gas reserves are at an all time high. We should rather be putting our major efforts into developing renewable and sustainable alternative sources of energy such as solar, wind, geothermal and hydrogen fusion.

It's even more alarming that this is taking place when global warming, related climate change and associated natural disasters are increasing rapidly due to the influence of fossil fuel burning and production of green house gases.

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A proposal of this nature has the real potential of causing very serious and significant , long term and cumulative negative impacts to a multitude of natural resources including soils, water, air,wildlife (e.g. Sage Grouse, etc.), native vegetation, riparian zones, forest and range ecosystems, etc.

From a legal perspective, the requirements of the National Environmental Policy Act (NEPA) will not likely be met with the preparation of just a general EA (Environmental Assessment). The overall size and magnitude (54,000 acres)of the proposal, along with the significant potential negative impacts which could occur, necessitate the preparation of a full blown Environmental Impact Statement (EIS).

This matter should be discussed with a legal counsel who has extensive experience in similar environmental situations!

The EIS document should be objectively prepared by neutral parties with no ties or connections with the fossil

fuel industry or government agencies. The document must be written using sound scientific data and information including new field research and studies, and not relying primarily on out-dated sources such as the Forest Service's 1986 Land and Resource Management Plan.

Furthermore, a simple EA is not sufficient and problematic since the leasing can be pieced-out, requiring the laborious task of evaluating each lease separately, rather than preparing a comprehensive EIS covering the entire proposed lease area.

Summarily, I strongly state my objection to this proposal and what it represents. Even if only a fraction of the proposed 54,000 acres would be leased out, the resultant negative impacts are not acceptable.

I vehemently say we do not need more fossil fuel developments at this time, both on public lands and offshore. Especially when they are sponsored and proposed by politicians and lobbyists who care little or nothing about preserving and protecting our superb, undeveloped wild places such as the grandeur of the Ruby Mountains.

Please keep me updated on this important issue, and acknowledge that you have received this correspondence. E-mails or postal would be fine.

Thank you.

Sincerely yours,

Joe M. Ratliff

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