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Title:

Comments: Reject Ruby Mountains Oil and Gas Leasing

May 23, 2018

Jenna Padilla, U.S. Forest Service

Dear U.S. Forest Service,

I am writing to urge you to deny the U.S. Bureau of Land Management's request that you open up the Ruby Mountains of the Humboldt-Toiyabe National Forest to oil and gas leasing.

A study published in Science Friday presents what authors call a sobering "reality check" on global efforts to protect biodiversity--one third of all conservation areas set aside as wildlife sanctuaries or national parks are "highly degraded" by human activities.

"The study shows that governments are overestimating the space available for nature inside protected areas. Governments are claiming these places are protected for the sake of nature when in reality they aren't. It is a major reason why biodiversity is still in catastrophic decline, despite more and more land being 'protected,'" study lead-author Kendall Jones of the University of Queensland said in a press release published by ScienceDaily.

Jones was joined by other researchers from the University of Queensland as well as from the University of Northern British Columbia and the Wildlife Conservation Society, which provided materials for the press release. They used what the abstract calls the "most comprehensive global map of human pressure" to determine that 2.3 million square miles--32.8 percent of all protected land--is under extreme pressure from grazing, urbanization, road-building and other human activities.

But the study indicates that, when it comes to protecting land, governments need to think about quality as well as quantity. The study found that, of lands protected before the CBD was ratified, 55 percent had experienced an increase in human-caused pressures since. However, that increase was lowest in large reserves with strict protections.

"We know protected areas work--when well-funded, well-managed and well placed, they are extremely effective in halting the threats that cause biodiversity loss and ensure species return from the brink of extinction. There are also many protected areas that are still in good condition and protect the last strongholds of endangered species

worldwide. The challenge is to improve the management of those protected areas that are most valuable for nature conservation to ensure they safeguard it," study author and University of Queensland Prof. James Watson said in the press release.

The Forest Service has absolute discretion to withhold its consent to federal oil and gas leasing beneath National Forest System lands. The agency is under no obligation to allow any leasing.

Given the importance of the Ruby Mountains for fish and wildlife, for outdoor recreation, and for our American heritage of public lands, leasing in the Ruby Mountains is a terrible idea.

The fact that the Rubies are the source of water for the nearby Ruby Lake National Wildlife Refuge raises serious concerns that any future oil and gas development will pose unacceptable risks to surface and groundwater.

There is no need to lease the Ruby Mountains. Right now, there is barely any oil and gas production in the State of Nevada and all leasing appears to be completely speculative. I urge the Forest Service not to allow our public lands to be used to fuel industry speculation.

Please, reject any and all oil and gas leasing in the Ruby Mountains of the Humboldt-Toiyabe National Forest.

Thank you.

Sincerely,

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