

Presentation before the Nevada's Sagebrush Ecosystem Council, by Cliff Gardner, representing the Rural Heritage Preservation Project, Oct. 1, 2014

Mr. Chairman and members of the Council:

We urge that members of this Council not adopt a plan or regulatory mechanism of the kind that is now before you – for several reasons.

First; the Council has not yet fairly or adequately considered such data as has been submitted or presented by the private sector. The Council has not yet completed an analysis addressing issues raised. Nor has the Council, at any time, invited a representative of the private or commercial sector to present information during regular session.

Repeatedly, those serving on this Council have stated, that all policy incorporated within the plan was to be based upon the “best available scientific and commercial data”.

How can any of you serving on this Council say decisions that have been made have been based upon the best available scientific and commercial data, when no analysis has been completed and you have ignored every bit of such data as has been presented by the private sector?

How can you say that the plan is based upon the best available scientific and commercial data available, when you have not yet studied the data that the plan is supposed to be based upon?

How closely have you looked at the data that has been put before you? Have you noticed that much of the so called science that is referenced within your Draft 2014 Sage Grouse Plan is rife with speculative language such as. “is thought to be”, “believed to be”, “probably was”, “might have played a role”, “was estimated to be”, “may have been”, “apparently”, “it has been suggested”, “experts suggest”, “experts believe”, and “may have caused”.

Such language is hypothetical only and does not represent “best available science”. An example of such language being used can be found on page 974 of John Connelly's Guidelines To Manage Sage Grouse - wherein the word “may” is used in ten different instances. The fact that this may occur or that may occur is not conclusive – it's only speculative and therefore not scientific.

Other questionable discussion within the Connelly Guidelines document, include the statement that “...lek counts may not provide an accurate assessment of sage grouse populations ... and the data should be viewed with caution.” “in Idaho 80 % of the leks hunted during spring in the 1990's had become inactive by 1994.” P 976

Another statement made which throws a questionable light on your sage grouse management plan is found on page 977 of Connelly's Guidelines, wherein it is stated “Although mining and

energy development are common activities throughout the range of sage grouse, quantitative data on long term effects of these activities on sage grouse are limited.”

Think about what is being said here. First, Mr. Connelly is raising questions about the validity of methods that are now being used for counting sage grouse. And then he throws a questionable light on whether mining has a negative effect on sage grouse or not.

Should this Council now be considering such a plan as this, knowing that no analysis has yet been completed weighing facts, one against the other, so as to determine the truth?

Should this Council now be considering such a plan as this, knowing that certain data that has been made available to them is being ignored and set aside for political reasons only.

Should this Council now be considering such a plan as this, knowing that it is based upon uncertainties, when such a plan will infringe upon the rights and liberties of so many within society?

We think not.

A handwritten signature in cursive script that reads "Cliff Mordue". The signature is written in black ink and is positioned below the text "We think not."