It appears this Council is now poised and ready to move to adopt a regulatory program for the purpose of protecting and enhancing sage grouse. I was hopeful that such an action would be postponed until such time that members of this Council had taken the time to fully consider much of the information I and others opposed to such a regulatory mechanism have been submitting during recent meetings. The assumption that private sector activities are the primary cause of the demise of sage grouse is in question.

Clearly it is not fences, power lines, housing or energy development that have caused sage grouse to decline as they have over the last several years. If such is so, than why is it that sage grouse have declined every bit as much or more on the Sheldon National Wildlife Refuge as elsewhere within the Great Basin? Why is it that sage grouse have declined so dramatically at Hart Mountain and Ruby Lake. Certainly it is not fence post, power lines or other human developments that have caused sage grouse to decline as they have on each of these management areas, for in each instance, such structures and activities are not allowed, or have been reduced on each of these refuges.

The same can be said regarding many of the most remote areas that are found throughout the Great Basin. If habitat fragmentation, roads, power lines, fence lines, housing and energy development are problematic for sage grouse, then why is it that sage grouse have declined every bit as much within the most remote and undeveloped valleys within the State of Nevada as they have within the more developed areas within the State?

Other questions have arisen as well - questions that have been raised with regards to the Paul Tueller study that was completed in 1979, which showed that grazing can increase forage production by as much 80 percent over plants that are fully protected; questions that have arisen relating to the thesis completed by Carol Evans regarding relations between livestock and sage grouse in 1986, and the conditions that now exist within the Sheldon Refuge today - questions regarding the true cause of runaway wildfire, the damage that these fires have caused, and why they have occurred; questions regarding the true status of sage grouse during pre-settlement times; and questions regarding the true effects that predator control have had on wildlife since the time of first settlement.

Someone needs to explain why it was that the greatest number of sage grouse were seen during the very time that we were running the greatest numbers of sheep and cattle on our western rangelands.

Nowhere has the importance of predator control been better demonstrated than on the Sheldon and Hart Mountain Refuges. Data in this regard was presented to this Council early on, yet I doubt that any person serving on this Council has yet taken the time to thoroughly examine and digest it. Discussions and analysis regarding such information should take place before steps are undertaken which might, in the end prove harmful to sage grouse or other wildlife.

Also of concern is the nearly constant disinformation that has been produced by agency personnel for public consumption over the years. This alone indicates that past actions taken by state and federal agencies over the years have been based on false assumptions. Such disinformation should be considered and taken into consideration as well.

I have such information here with me today. I only wish that you would allow me time to present it to you, along with more detailed information regarding the various issues which I have I have referenced here today.

Inability to present information in sufficient detail so that its significance can be fully understood has long been a great source of frustration for us. From the time that this process was begun until now, agency personnel have been given full consideration for whatever input they desire to present while persons such as ourselves who represent an opposing point of view are held to a minimal time allowance. We ask that this policy be changed, so that a more balanced approach is taken.

Mostly however, let me again express our concern that this Council not proceed toward establishing a regulatory mechanism for mitigation until such as the issues we have raised are fully addressed, discussions have occurred, and an analysis has been completed.

Thank you for allowing me the time to express these concerns.

Respectfully submitted;

EAJ Marches

Cliff Gardner