

**Arizona Wildlife Federation · Colorado Wildlife Federation · Idaho Wildlife Federation ·
Montana Wildlife Federation · National Wildlife Federation · Nevada Wildlife Federation ·
New Mexico Wildlife Federation · Utah Wildlife Federation · Wyoming Wildlife
Federation**

June 21, 2022

U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Re: The Bureau of Land Management's June 2022 Lease Sale

Dear Director Stone-Manning:

On behalf of the National Wildlife Federation, Arizona Wildlife Federation, Colorado Wildlife Federation, Idaho Wildlife Federation, Montana Wildlife Federation, Nevada Wildlife Federation, New Mexico Wildlife Federation, Utah Wildlife Federation, and Wyoming Wildlife Federation (the "affiliates"), we write in support of the Bureau of Land Management's revised approach to oil and gas leasing as proposed in its June 2022 Regional Oil and Gas Lease Sales, including the agency's reasoned deferrals and first-ever royalty rate increase. We encourage the BLM to codify these and other changes on a broader scale through a formal rulemaking process, ensuring that oil and gas leasing on public lands occurs in a way that is consistent and deliberate, focuses development where there is the most potential for recovery, and allows the agency to manage public lands for other uses as well, including the conservation and restoration of wildlife habitat.

We support the BLM's proposal to prioritize oil and gas development outside of important wildlife habitat. For example, the agency properly deferred parcels in many big game migration corridors across the West, ensuring that important seasonal ranges remain connected, and that mule deer, elk, pronghorn, and other species can access important resources undeterred as they move across the landscape. Further, we support the agency's effort to avoid priority habitat for the Greater sage-grouse and to include stipulations and lease notices on parcels in or near general habitat. As we have seen, sage-grouse populations continue to drop, with recent studies showing the species declining throughout its range at approximately 3.0% annually from 1965-2019.¹ Prioritizing oil and gas development outside key habitat will help ease impacts on sage-grouse.

We also appreciate the agency's intent to defer parcels with low or no oil and gas development potential while prioritizing parcels that are adjacent to or near existing oil and gas activity. Leaving low-potential lands unleased will allow the agency to manage them for other purposes, including wildlife protection, habitat conservation and restoration, and recreation. Moreover, collocating oil and gas activity will reduce the overall footprint of energy development and limit wildlife impacts and habitat fragmentation.

¹ U.S. Geological Survey, "Range-wide Greater Sage-Grouse Hierarchical Monitoring Framework: Implications for Defining Population Boundaries, Trend Estimation, and a Targeted Annual Warning System," at 87 (Mar. 30, 2021).

Finally, we applaud the BLM’s proposal to raise the royalty rate on these leases to 18.75 percent—a needed increase to reflect modern leasing practices and ensure a fair return to taxpayers. This change will make the federal government’s royalty rate for these parcels consistent with those imposed by states and private landowners and will generate additional revenue for the federal government and the states in which the development takes place.

We support many of the leasing reforms BLM proposes in its June 2022 Lease Sales. However, we urge the agency to codify these and other changes through a formal rulemaking process. The National Wildlife Federation and many of our affiliates, including several of the undersigned, submitted comments on the federal oil and gas program review in April 2021. In those comments (see attached), we noted the importance of initiating a rulemaking to update the 100-year-old federal leasing program to provide a more balanced approach to federal land management. Such a process should be efficient, but also open, inclusive, transparent, and robust and include meaningful tribal consultation, along with participation from impacted states and local communities.

We look forward to working with the BLM as it continues to review its federal oil and gas leasing program. If you have any questions, please do not hesitate to reach out.

Sincerely,

Arizona Wildlife Federation

Nevada Wildlife Federation

Colorado Wildlife Federation

New Mexico Wildlife Federation

Idaho Wildlife Federation

Utah Wildlife Federation

Montana Wildlife Federation

Wyoming Wildlife Federation

National Wildlife Federation