

June 13th, 2022

Director Tracy Stone-Manning
Bureau of Land Management
US. Department of the Interior
1849 C Street, N.W.
Washington D.C. 20240

Re: Bureau of Land Management's Colorado June 2022 Oil and Gas Lease Sale

Dear Director Stone-Manning:

On behalf of Colorado Wildlife Federation, National Wildlife Federation and the Theodore Roosevelt Conservation Partnership we write to express our general support for the Bureau of Land Management's (BLM) revised approach to oil and gas leasing in Colorado as proposed in its June 2022 lease sale. We appreciate BLM's proposed exclusion of parcels located in areas with low or no known oil and gas development potential. Many of the parcels in southeastern Colorado are essential habitat for our state mammal, the bighorn sheep, and overlap with ever-shrinking short grass prairie habitat, which supports several tier 1 species of greatest conservation need in the Colorado State Wildlife Action Plan. Our organizations also applaud BLM's proposal to raise the royalty rate on leases to 18.75 percent, as this increase will make the federal government's royalty rate for these parcels consistent with those imposed by states and private landowners and provide a fair return to taxpayers. The higher rate also will generate additional revenue for the federal government and the states in which the development occurs, including Colorado. We encourage BLM to undertake a rulemaking process as soon as practicable to advance these and other needed changes to oil and gas leasing on federally managed public lands.

In addition, we support BLM's effort to avoid priority habitat management areas for the greater sage-grouse and to include stipulations on parcels in or near the bird's general habitat management areas to reduce disturbance to its key habitat. Throughout the western states sage-grouse populations continue to drop, with recent studies showing the species declining in its range at approximately 3.0% annually from 1965-2019.¹

As stated in our earlier comments, we remain concerned with BLM's intent to lease parcels in elk, mule deer, and pronghorn winter concentration areas, severe winter range, mule deer and elk migration corridors, and in an elk production area. We still believe it is advisable to defer these parcels from the sale, on account of BLM initiating a process this month to update its resource management plans (RMPs) via a statewide big game amendment. The need to amend RMPs that overlap with big game migration corridors and high-priority habitat reveals that the policies and guidance in-place are generally insufficient or outdated. By way of example, one of

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)

the three BLM parcels that overlap elk and mule deer migration corridors (Parcel 264) is situated along State Highway 64 between mile markers 33 and 37 which is a significant area for mule deer and elk highway crossings according to Colorado Parks and Wildlife's species activity mapping data. The highway segment between mile markers 59 and 68.5, east of this location, was recently identified as one of the top five percent of highway segments in need of wildlife crossing infrastructure by the Colorado Department of Transportation (CDOT) in its [Western Slope Wildlife Prioritization Study](#). Parcel 6210, adjacent to the above parcel further from the highway, also overlaps elk and mule deer migration corridors and winter concentration areas, and yet not all relevant big game stipulations were applied.

Our state agencies, including Colorado Parks and Wildlife, CDOT, and the Colorado Oil and Gas Conservation Commission (COGCC), are working diligently together to safeguard migration corridors. By way of example, the wildlife rules adopted by COGCC in the fall of 2020 specifically address migration corridors and high-priority habitats mapped by CPW. The 2021 big game policy report by Colorado Department of Natural Resources in cooperation with CDOT "[Opportunities to Improve Sensitive Habitat and Movement Route Connectivity for Colorado's Big Game Species](#)" outlines opportunities and mechanisms for conserving Colorado's big game species through consistent application of policies and priorities, supported by the best available data and science.

We look forward to working with BLM as it continues to review and update its federal oil and gas leasing program. In addition, we shall be pleased to engage with Colorado BLM in its process for development of a statewide big game amendment to its resource management plans.

Please contact us if you have any questions or wish to discuss this letter.

Sincerely,

Suzanne O'Neill
Executive Director, Colorado Wildlife Federation

Bailey Brennan
Public Lands Counsel, National Wildlife Federation

Liz Rose,
Colorado Field Representative, Theodore Roosevelt Conservation Partnership

cc: Nada Culver, Deputy Director of Policy and Programs
Colorado BLM Acting Director Stephanie Connolly