

February 11, 2025

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW, Mail Stop 7328
Washington, DC 20240

Dear Secretary Burgum:

On behalf of the National Association of Home Builders (NAHB), I would like to congratulate you on your confirmation as Secretary of the U.S. Department of the Interior (DOI). NAHB looks forward to working with you as you bring your leadership and experience to DOI during this critical time for our nation's economy as NAHB members are struggling to boost U.S. home building production necessary to address the chronic housing affordability crisis impacting American families.

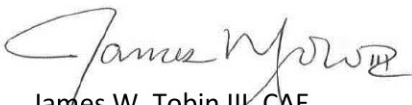
NAHB is committed to working with you and your leadership team to promote sound natural resource management policies that respect the rights of states to manage their own resources, land use planning authorities, and reduce the federal regulatory bureaucracy that impedes economic growth. Ensuring that federal natural resource policies do not place undue economic burdens upon states, local governments, and businesses, including the home building sector, must be a priority.

NAHB was encouraged by your signing of several secretarial orders focused on advancing President Trump's priorities for boosting domestic energy production, reducing regulatory burdens, and addressing the cost-of-living challenges experienced by working families. As you begin to work toward these goals, NAHB strongly urges you to consider amending the Endangered Species Act's (ESA) regulations governing species listings, designation of critical habitat, and permitting under the Section 7 Consultation regulations and Section 10 Incidental Take Permits, which significantly delay housing production and needlessly raise its cost.

Restoring the regulatory reforms finalized during the first Trump administration, including finalizing a regulatory definition for the term "habitat," restoring the 4(d) rule to exempt unavoidable impacts to "threatened" species from the ESA's strict "take" prohibitions, requiring full consideration of economic impacts resulting from a species listing or the designation of critical habitat for listed species, utilizing the ESA's 4(b)(2) discretionary authority to exclude specific areas from final critical habitat designation where economic costs outweigh the benefits to the species, and streamlining the ESA's Section 7 Consultation process would go a long way toward reducing the ESA's regulatory burdens.

NAHB's senior leadership would appreciate the opportunity to meet with you to begin a productive dialogue on these and many other issues. Again, congratulations on your confirmation as the 55th Secretary of the U.S. Department of the Interior. NAHB looks forward to working with you in 2025 and beyond.

Best regards,



James W. Tobin III, CAE
President and Chief Executive Officer
National Association of Home Builders
of the United States