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Good morning –

Please find attached a letter from American Farm Bureau Federation President Zippy Duvall to Secretary Burgum. We appreciate the efforts already made by the Secretary to address many issues of concern to our farmer, rancher and forester members across the country.

Shelby

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February 20, 2025

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

Dear Secretary Burgum:

The American Farm Bureau Federation congratulates you on your confirmation as the 55th Secretary of the U.S. Department of the Interior. AFBF is our nation's largest general farm organization, working together to build a sustainable future of safe and abundant food, fiber, timber and renewable fuel for our nation and the world. Farm Bureau's farmer, rancher and forester members are ready and willing to work with you and your team to address issues of critical importance to American agriculture and rural communities.

As stated in our letter to the Senate supporting your confirmation, "Federal government-created barriers, especially in recent years, have left Farm Bureau members with significant uncertainty for the future...[your] leadership is needed to ensure continued multiple-use management of federal lands for our grazing permittees, to stabilize the western water supply, and address a variety of species issues."

We value your understanding of agriculture and western issues, and I would like to schedule a meeting with you at a mutually convenient time to discuss the variety of challenges facing America's farmers, ranchers and foresters. I have attached a summary of the major issues of interest as you begin your tenure, and I look forward to visiting with you in person soon.

Sincerely,

A handwritten signature in black ink, reading "Zippy Duvall". The signature is fluid and cursive, with the first name "Zippy" being more prominent and the last name "Duvall" following in a similar style.

Zippy Duvall
President

Multiple Use and Management of Public Lands

Livestock grazing on federal lands is critical to ranching operations in the West, and AFBF supports the multiple-use management mandate for public lands that allows this generations-long practice to not only provide food for our nation but serves to manage and conserve natural resources and the communities that depend on them.

The Bureau of Land Management's Public Lands Rule exceeded the legal authority of the department under the Federal Land Policy and Management Act (FLPMA) by determining that "conservation" is a use under the law. Additional provisions of the rule that tier down from this determination, such as conservation and restoration leases, are also problematic. BLM's emphasis on expanding Areas of Critical Environmental Concern (ACEC) in the rule will inappropriately use this very restrictive land designation and could negatively impact western ranching communities. The decrease in public notice and comment for ACEC designations is contrary to the public input provisions of FLPMA.

There are areas in the west where local and state governments and private landowners would like to more easily address lands checkerboarded with federal government lands. Land transfers, exchanges, and purchases can take decades because of slow processes, and we encourage the Department to take a fresh look at opportunities to improve those processes.

Monuments

The Biden Administration expanded and added monument designations to lands across the country, primarily in the west. Local communities, especially in Utah, Colorado, and California, did not support monument designations. BLM's recently approved Resource Management Plan for Bears Ears National Monument and Grand Staircase-Escalante National Monument ignored input from local ranchers, communities, and the governor. Ranchers and foresters in northern California were disappointed by the new Sattitla Highlands National Monument, and in Arizona and Utah by the new Baaj Nwaavjo I'tah Kukveni – Grand Canyon National Monument. In practice, the management of monuments in the west has consistently reduced grazing rights, access to public lands, and land management for fire resilience. AFBF continues to oppose monument designations that have not been first vetted and approved by Congress, landowners and local governments affected by the decisions.

Wild Horse and Burro Management

Improved management of wild horse and burro populations is needed to address overpopulation that threatens the rangeland ecosystem through overgrazing native plants, exacerbating invasive establishment, and negatively impacting other species like sage grouse. AFBF is part of a diverse stakeholder group called The Path Forward that has outlined an economically and environmentally viable, humane, non-lethal, and feasible long-term management plan for wild horses and burros in the American West. The tenets of that plan are as follows:

- (1) Relocate removed wild horses and burros to more cost-effective pasture facilities,
- (2) Contract with private parties to secure lower-cost leasing of land for long-term humane care of removed horses and burros,
- (3) Apply proven, safe and humane population growth suppression strategies to every herd that can be reached utilizing trained volunteers, Agency staff, and animal health professionals, as individual Herd Management Areas dictate to prevent repeated gathers and,
- (4) Promote adoptions in order to reduce captive populations and costs.

AFBF looks forward to working with BLM on this critical issue.

BLM Utility Scale Solar Energy Development

BLM signed a Record of Decision and amendments for solar development on BLM land in December 2024, over the objections of some State Farm Bureaus. As the Utah Farm Bureau noted in its protest letter, the final document estimated that approximately 29.9 million acres of grazing allotments would overlap the lands available for utility-scale solar applications or 90% of total lands available for application. Public lands permittees are already facing significant land use pressures, and while diversity in domestic energy production is a laudable goal, it should not come at the expense of an existing and important land use.

BLM Sage-Grouse Plan Amendments

BLM's effort to update sage-grouse plans in western states fell short of the goal of a collaborative federal-state process. Amendments to habitat management plans on public lands in Colorado and Oregon were finalized in early 2025, and in many states the citizens and governors were not satisfied that BLM's proposals were consistent with state plans. We encourage BLM to revisit this process to more closely align with the local and state stakeholders.

Forest Management

Ranchers, land users, and surrounding communities have been devastated by wildfires and depend on a new focus on forest management. Greater focus must be placed on appropriate and proactive forest management that increases in pace and scale, includes grazing as a solution, and reduces wildfire risk. Federal lands in the west are often checkerboarded with private lands, and when fires start they know no human-created boundaries or jurisdictions. It is critical that DOI actively coordinate with private landowner neighbors to both prevent fires on federal lands and effectively suppress them when started.

Endangered Species Act Implementation

Endangered and threatened species protection can be more effectively achieved through collaborative conservation and providing incentives to private landowners and public land users rather than by imposing land use restrictions and penalties. Farm Bureaus across the country have played a leading role in education and outreach to protect at-risk species such as the monarch butterfly and lesser prairie-chicken. Unfortunately, ESA listings often entangle farmers

and ranchers in bureaucratic red tape rather than providing a path to achieve shared conservation goals.

Regulations promulgated by the Biden Administration to revise, rescind or revoke prior Trump Administration ESA implementation rules should be reconsidered. AFBF encourages FWS to revisit ESA implementation regulations promulgated in the last four years.

Specific Species Issues

In recent years, the Fish and Wildlife Service has promulgated rules and taken positions on specific species that impact farmers and ranchers. Against the wishes of local communities and ranchers, FWS and the National Park Service have planned to reintroduce grizzly bears into the North Cascades Ecosystem. AFBF and the Washington Farm Bureau strongly oppose this position and urge FWS and NPS to reconsider their decision.

Additionally, the FWS denied petitions from Montana and Wyoming to delist the grizzly bears in the Greater Yellowstone Ecosystem and Northern Continental Divide Ecosystem and return them to state management. The current FWS proposal to create a new Distinct Population Segment of grizzly bears and list it as threatened with a 4(d) rule under the ESA does not reflect the highly successful recovery of the grizzly bear. We urge FWS to rescind this proposal and focus on the science showing the grizzly should be delisted and management returned to the states.

Gray wolves also remain listed in much of the United States, even though their numbers have recovered. Like the grizzly bear, FWS is encouraged to review the data for potential delisting.

Several outstanding proposals to list pollinators could also have significant impacts on farmers and ranchers. In particular, there is currently an open comment period for a proposal to list the monarch butterfly as threatened with a 4(d) rule. FWS has proposed some exceptions for routine agricultural and ranching operations, but the proposal is still unclear in some areas and the potential impacts on the use of crop protection tools could be significant. FWS is encouraged to carefully review the proposal.

Migratory Bird Treaty Act Implementation

There are many species of birds protected by the Migratory Bird Treaty Act that have sustainable populations but have become very impactful to America's farmers and ranchers. Black vultures attack weak and vulnerable livestock and cormorants devastate aquaculture operations, to name two examples. Farm Bureau encourages a cooperative approach with impacted farming communities to expand depredation permits.

Western Water

Water is a critical resource to farmers, and water infrastructure is especially critical in regions receiving less rainfall than the rest of the country. Farm Bureau supports continued federal investments in western water infrastructure to ensure that farmers and ranchers have the necessary water resources to continue to grow food for our nation and the world. Farm Bureau also encourages the administration to ensure that as major decisions are made about water availability in the west, especially along the Colorado River, agriculture has a seat at the table.

With multiple federal agencies holding jurisdiction for issues around water, a revived “Water Subcabinet” with robust involvement from the Department is essential to a coordinated federal approach to water quality and Western water infrastructure challenges.