

March 24, 2025

The Honorable Bruce Westerman  
Chairman  
Committee on Natural Resources  
1324 Longworth House Office Building  
Washington, DC 20515

The Honorable Jared Huffman  
Ranking Member  
Committee on Natural Resources  
1332 Longworth House Office Building  
Washington, DC 20515

The Honorable Harriet Hageman  
Chairwoman  
Subcommittee on Water, Wildlife, and Fisheries  
1227 Longworth House Office Building  
Washington, DC 20515

The Honorable Mike Ezell  
Vice Chair  
Subcommittee on Water, Wildlife, and Fisheries  
443 Cannon House Office Building  
Washington, DC 20515



Dear Chairman Westerman and Ranking Member Huffman,

Since 1884, the Montana Stockgrowers Association (MSGA) has been dedicated to finding proactive solutions to the most difficult challenges facing Montana's cattle ranching families. Our organization represents land owners who run livestock on combined private, state, and federal lands and who have significant and long-standing interest in the management of endangered species. Our members have experienced first-hand the impacts of the Endangered Species Act (ESA) on their ranching operations and federal grazing permits.

MSGA is writing to express their emphatic support of H.R. 1897 and voice our appreciation of the work of Chairman Westerman in sponsoring this monumental legislation. ESA reform, like this act proposes, is critical to optimization of conservation efforts, increasing efficiency in processes and managing natural resources in the most effective, and practical manner.

A major source of frustration of ESA processes falls within Title III. Species frequently maintain their threatened or endangered status even after Species Status Assessments (SSA's) clearly show a recovered population – in short, the goalpost for recovery continues to move to fit political agendas. The state of Montana is facing just such a situation in the

case of the recently released grizzly bear proposed management changes (Docket ID: FWS-R6-ES-2024-0186-0001). The proposed rule does not offer a delisted status or return to state management, although multiple ecosystems have met recovery metrics. Our ranchers have worked hard to implement voluntary, non-lethal management techniques to protect their livestock and families while assisting in grizzly bear recovery. Yet their work has gone entirely unrecognized and unrewarded by the USFWS, who continues to implement stringent management requirements, regardless of the scientific proof of an increasing, genetically diverse grizzly bear population. This avoidable situation is simply an example of the economic and cultural damage caused by the ESA in its current form.

The proposed changes to Title III address many of our concerns. The requirements to consistently review listed species determinations, to establish incremental recovery goals and easing regulations when goals are met is a common sense approach to species management. These changes also ensure an unmoving goal post. Further, MSGA appreciates the value that this act places on rewarding voluntary conservation and nonlethal management efforts of landowners, by pausing critical habitat designation as they implement land management plans that conserve the species. Our ranchers have been managing this way for decades, and we look forward to seeing the fruits of their labor.

MSGA appreciates the amendments to Title IV that emphasize accountability and transparency in species recovery. These changes force USFWS and NMFS to look at species designations holistically, utilizing the best available data. The analysis of economic and national security impacts for each listing and critical habitat designation will provide stakeholders, state and federal agencies with a complete picture of the impacts of a decision.

MSGA has long supported ESA reform and this act addresses many of the biggest concerns of ranchers across the country. We appreciate your consideration of our points and we strongly encourage the passage of H.R. 1897.

Sincerely,

A handwritten signature in black ink, appearing to read "Raylee A. Honeycutt", with a stylized flourish at the end.

Raylee A. Honeycutt  
Executive Vice President

cc: The Honorable Senator Steve Daines  
The Honorable Senator Tim Sheehy  
The Honorable Congressman Ryan Zinke  
The Honorable Congressman Troy Downing