



Montana Natural Resource Coalition of Counties, Inc.

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June 12, 2025

Honorable Doug Burgum
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Mr. Gregory Zerzan
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Re: Time Extension Request - DOI Regulatory Reform Request for Information.
Docket No. DOI-2025-0005; Fed. Reg. 90 at 21504

Via: Electronic Mail at RegulatoryInfo@doi.gov and jacob.tyner@sol.doi.gov; US
Postal Service

Dear Deputy Solicitor Tyner:

Through this letter, the Montana Natural Resource Coalition of Counties (MtNRC) is requesting a sixty (60) day extension to the June 20, 2025 deadline for submission of comments to the Regulatory Reform Request for Information docket published at Fed. Reg. 90 at 21504.

The requested time extension will allow MtNRC time to adequately review historical policy and regulatory submissions, gain input from other state or local county governments, and prepare a substantive response to the Regulatory Reform administrative record that supports the Department of Interior (DOI) in its implementation of President Trump's natural resource and energy policy agenda:

1. E.O. 14153 "*Unleashing Alaska's Extraordinary Resource Potential*"
2. E.O. 14213 "*Establishing the National Energy Dominance Council*"
3. E.O. 14261 "*Reinvigorating America's Beautiful Clean Coal Industry and Amending E.O. 14241*"
4. E.O. 14241 "*Immediate Measures to Increase American Mineral Production*"
5. E.O. 14156 "*Declaring a National Energy Emergency*"
6. E.O. 14225 "*Immediate Expansion of American Timber Production*"
7. E.O. 14260 "*Protecting American Energy from State Overreach*"

MtNRC is collaborating with the Boundary Line Foundation (BLF) and other state and local governments to identify Bureau of Land Management (BLM), National Park Service (NPS), and Fish and Wildlife Service programs, regulations, policies, programs, and burdens that unduly affect local governments, and as a result need to be modified, rescinded, repealed, and/or restored.

Individual DOI agency actions and examples MtNRC intends to consider during the analysis and comment process include:

- **Grazing Regulations** - BLM; [85 Fed. Reg. 3410](#)
- **Missouri Headwaters Conservation Area** - FWS; [Press Release Sep. 20, 2023](#).
- **Conservation and Landscape Health Rule** - BLM; [89 Fed. Reg. 40308](#); [DOI Secretarial Order 3418](#); [OIRA RIN Notice of Review](#).
- **Miles City/Buffalo Powder River Basin RMP Amendments** - BLM; [84 Fed. Reg. at 53171](#); [88 Fed. Reg. at 29689](#); [89 Fed. Reg. at 43432](#).
- **Rescission of Biden Final Rule Defining Critical Habitat** - FWS; [87 Fed. Reg. at 37757](#).
- **RMP Amendments for Sage Grouse Planning** - BLM; [89 Fed. Reg. at 18963](#) and [86 Fed. Reg. at 66331](#).
- **ESA Historical Range Rule** - FWS; [88 Fed. Reg. at 42643](#).
- **Review of Record of Decision for North Dakota BLM Resource Management Plan and EIS** - BLM; [90 Fed. Reg. at 3915](#).
- **Grizzly Bear Listing, Lower 48 with 4(d) Rule** - FWS; [90 Fed. Reg. at 4234](#).
- **Grizzly Bear Restoration/Introduction, North Cascades WA** - NPS, FWS; [80 Fed. Reg. at 8894](#); [87 Fed. Reg. 68190](#).
- **Grizzly Bear Introduction EIS, NCE** - NPS, FWS; [80 Fed. Reg. at 8894](#).
- **Rescission of DOI Secretarial Order 3410** “Restoration of American Bison and the Prairie Grasslands,” and dissolution of the Interagency Bison Conservation Working Group - NPS, FWS, BLM.
- **National Wildlife Refuge System Planning Policies** - FWS; [88 FR at 63547](#).

The time extension will afford MtNRC sufficient opportunity to provide substantive input that supports DOI as it implements President Trump’s energy and natural resource agenda, and addresses the concerns of MtNRC county governments.

Regards,

Ross Butcher
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President, MtNRC
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The Montana Natural Resource Coalition was organized to engage federal and state administrative governments on behalf of our individual county members. Current Montana County members are Beaverhead, Blaine, Carter, Fergus, Garfield, Liberty, McCone, Musselshell, Petroleum, Phillips, Pondera, Powder River, Prairie, Richland, Roosevelt, Rosebud, Sweet Grass, Valley, Wibaux, Yellowstone, and Toole Counties.