

***ADVOCACY SUBMITS COMMENTS ON THE U.S. FISH AND WILDLIFE SERVICE'S PROPOSED CRITICAL HABITAT DESIGNATION FOR GUNNISON SAGE-GROUSE***

On December 2, 2013 the Office of Advocacy of the U.S. Small Business Administration (“Advocacy”) submitted a comment letter to the U.S. Fish and Wildlife Service (“FWS”) on the proposed rule *Endangered and Threatened Wildlife and Plants; Proposed Endangered Status for Gunnison Sage-grouse and Proposed Critical Habitat for Gunnison Sage-grouse*. The proposed rule would designate critical habitat in southwestern Colorado and southeastern Utah for the Gunnison Sage-grouse. A copy of Advocacy’s comments can be found at [www.sba.gov/advocacy](http://www.sba.gov/advocacy).

- The economic analysis is unclear with regard to the rule’s effects on private landowners’ abilities to continue to participate in grazing leases and mineral leases. The critical habitat designation will increase the costs of these agreements, preventing these small entities from readily entering into similar agreements in the future. Advocacy encourages FWS to separately examine the potential effects of the critical habitat designation on private landowners who participate in these agreements.
- FWS’ analysis focuses solely on managerial costs to federal action agencies even though recreation-based tourism, representing significant revenue for the local economy, relies on trails within proposed critical habitat. Advocacy encourages FWS to examine the potential effects on recreation-based tourism, which is “significantly dependent” on the use of Federal lands.
- FWS’ economic analysis does not address the potential costs to small municipalities. The economic analysis does not discuss any potential impacts to local governments while discussing transportation. The development of habitat conservation plans can be increasingly expensive and the real burden is placed on small municipalities. FWS should examine the potential effects on small municipalities, particularly regarding transportation projects and development of habitat conservation plans.

For more information, please visit Advocacy’s webpage at [www.sba.gov/advocacy](http://www.sba.gov/advocacy) or contact Kia Dennis at 202.205.6936.