



BOARD OF COMMISSIONERS

District 1 – Cody Davis 970-244-1605
District 2 – Bobbie Daniel 970-244-1604
District 3 – Janet Rowland 970-244-1606

August 15, 2023

Ms. Martha Williams, Director
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041–3803

Comments to be submitted electronically via www.regulations.gov

RE: Comments on Endangered and Threatened Species Proposed Rules, Docket: FWS–HQ–ES–2021–0107 Listing and Designating Critical Habitat

Dear Director Williams:

Thank you for the opportunity to comment on the Endangered and Threatened Species Proposed Rule regarding Listing and Designating Critical Habitat. In 2018, Mesa County provided comments in support of efforts by the US Fish and Wildlife Service ("USFWS") to balance species conservation with more predictable, efficient, and reasonable administrative processes.

Mesa County's comments specific to Docket: FWS–HQ–ES–2021–0107 Listing and Designating Critical Habitat are as follows:

50 CFR 424.11(b)

Mesa County recognizes that making decisions based on scientific data is crucial, and we support the evaluation of potential listings and designations based on this data. However, the importance of conducting an economic analysis cannot be over emphasized. This analysis is essential because any listings of Threatened and Endangered species or designation of their critical habitat, invariably have economic implications for local communities. Therefore, we strongly oppose restoration of the phrase "without reference to possible economic or other impacts of such determination" in 50 CFR 424.11(b).

Economic impacts resulting from such listings can affect various sectors, including agriculture, tourism, real estate, and development and may restrict certain land uses, limit development opportunities, and affect property values. On the other hand, preserving endangered species and their habitats may enhance eco-tourism, potentially bringing economic benefits to the region. Understanding the financial implications is also crucial for local governments to prepare and make informed decisions about future development, budgetary planning, and resource management.

Opposing the exclusion of economic impacts from consideration in the determinations is not meant to undermine the significance of scientific data. Rather, it is an assertion that decisions should be made with a broader perspective that encompasses both environmental conservation and economic realities. Ignoring economic impacts can lead to unforeseen negative consequences for the local economy, which may hinder community growth and development.

By striking a balance between scientific data and economic analysis, Mesa County believes that a more informed and well-rounded approach can be achieved. This approach ensures that the conservation of natural resources and wildlife is harmonized with the economic well-being of the local community. Mesa County urges the USFWS to retain the language as is in the 2019 Rule.

Sincerely,

Janet Rowland, Chair
Mesa County Board of Commissioners

Cody Davis
Commissioner

Bobbie Daniel
Commissioner

cc: Mesa County Administration
Peter Baier, Mesa County Administrator
Todd Starr, Mesa County Attorney