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Public Comments Processing
Attn: FWS-R2-ES-2010-0085
Division of Policy and Directives Management
US Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222
MS 2042 – PDM
Arlington, VA 22203

The Gila County Board of Supervisors would like to offer comments on the "Listing and Designation of Critical Habitat for the Chiricahua Leopard Frog; Proposed Rule, (FWS-R2-ES-2010-0085), revisions to the proposed rule," published in the September 9, 2011 Federal Register as well as the draft Economic Analysis and the draft Environmental Assessment, as identified in the September 9, 2011 Federal Register. Our comments relate to the areas within and adjacent to Gila County that are addressed in this proposed rule, the draft Environmental Assessment and the draft Economic Analysis.

Gila County is a rural county, comprised largely of federally managed land, a considerable area of Native American Reservation lands, and a mere 4% of the land in Gila County privately owned. Our local economies depend both on resource based industries and recreation opportunities provided to our visitors and our residents. With a 12% unemployment rate county-wide and 21% of our residents living at or below 200% of the federal poverty level, we are keenly aware of the detrimental effect that is caused by restricting business and recreational opportunities.

We do not feel that the impact on local economies has been even remotely examined. The economic analysis focuses almost exclusively on the administrative costs to the federal agencies for consultation related to the designation of critical habitat. According to the news release announcing the reopening of the comment period, "The draft economic analysis of the critical habitat proposal indicates that no significant economic impacts are likely to result from the designation of critical habitat. Incremental costs over the next 20 years are limited to \$1.3 - \$1.7 million in administrative efforts of new and re-initiated consultations with federal agencies." In a federal department with a published budget of \$1.69 billion for 2012 alone, this amount does seem rather insignificant. When compared to a county with a 12% unemployment rate, where 21% live at or below 200% of the federal poverty level, the costs and the lack of examination of real economic impact to local economies affected by the added regulation seems absurd.

We support and echo the comments previously submitted by the Coalition of Arizona/New Mexico Counties for Stable Economic Growth, dated May 16, 2011, and concur that the scientific data does not support the proposed designation of critical habitat. The proposed rule ignores the best scientific information available and bases many of its conclusions on supposition and speculation about the future.

The Gila County Board of Supervisors believe that once again, this proposed rule is evidence of species management by litigation, rather than a more holistic, evidence based management objective grounded in the health, functionality and productivity of the ecosystem as a whole.

The Gila County Board of Supervisors thanks you for the opportunity to comment and requests to be kept informed and included in the process as this analysis continues and as the US Fish and Wildlife Service evaluates, reviews and reaches a decision regarding this proposed rule.

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