Frequently Asked Questions about the Draft Economic Analysis of Proposed Critical Habitat for Bull Trout in the Columbia and Klamath River Basins

Q. What is the purpose of the economic analysis?
The Endangered Species Act requires the U.S. Fish and Wildlife Service to estimate economic and other impacts associated with designating any particular area as critical habitat. This assessment is completed through the preparation of an economic analysis.

Impacts identified in an economic analysis may be used by the Secretary of the Interior to determine if certain areas should be excluded from critical habitat based on a comparison of the benefits of exclusion versus the benefits of including a particular area as critical habitat, as long as the exclusion does not result in the extinction of the species. Economic impacts are not used to determine whether or not a species should be listed under the Act – decisions to list species under the Act are based solely on an assessment of a species' status using the best available scientific and commercial information.

Q. What are the results of the draft economic analysis?
The draft economic analysis estimates that protecting bull trout (*Salvelinus confluentus*) and their habitat in the Columbia and Klamath basins could potentially have economic impacts of $230 million to $300 million over the next 10 years (about $23 million to $30 million per year).

Q. Are these new costs?
Most of the estimated costs already are occurring due to the listing of bull trout and protective measures already in place for listed salmon and steelhead. More than 60 percent of the area proposed for bull trout critical habitat already has been classified as salmon and steelhead critical habitat, although much of that designation was recently withdrawn for re-analysis by the National Marine Fisheries Service.

Q. Who will bear most of the costs?
Federal agencies are estimated to bear 75 percent of the costs associated with listing and the potential costs of the proposed critical habitat designation, with private and other entities (States, Tribes) incurring 25 percent.

Q. How does the designation of critical habitat potentially result in economic impacts?
Section 7 of the Act requires Federal agencies to consult with the Service if an action that is carried out, funded, or permitted by them may affect a federally listed species or its designated critical habitat.

The purpose of a consultation is to ensure that proposed projects that are being carried out,

funded, or authorized by a Federal agency will not jeopardize the continued existence of a listed species or adversely modify its designated critical habitat. Through the consultation process, impacts to species or designated critical habitat can be minimized or offset by developing appropriate conservation measures, including project modifications. Implementation of conservation measures and the process of conducting a consultation itself involve costs to Federal agencies, including the Service, and to project applicants.

Q. Does critical habitat affect all projects?
No. Critical habitat only affects those projects that have some type of Federal agency involvement. Projects proposed on non-Federal land are not affected by the designation of critical habitat, even if a project is proposed in an area designated as critical habitat, unless a proposed project requires a permit, authorization or funding from a Federal agency.

Q. What framework was used to prepare the economic analysis of the critical habitat proposal for the Klamath and Columbia populations of bull trout?
The draft economic analysis first identified a baseline (world without critical habitat) then estimated the total costs to Federal, State, Tribal, and local agencies and governments, and private entities related to additional consultations that would likely be required under section 7 of the Act.

Under the Act, section 7 consultations are required to ensure that a listed species will not be jeopardized by a project and that critical habitat will not be adversely modified. Impacts associated with section 7 consultations include costs related to administration, project modification, and project delay.

The economic analysis for bull trout in the Columbia and Klamath basins does not separate costs that already are occurring as a result of the bull trout's listing as a threatened species from those that might occur from a critical habitat designation. The past consultation record was used as a starting point from which to predict future consultation activity.

Q. What sources of information were used to prepare the economic analysis?
The analysis is based on a wide range of information sources. Numerous individuals were contacted from the Fish and Wildlife Service, as well as from the U.S. Forest Service, Federal Highway Administration, Bureau of Land Management, Army Corps of Engineers, Bureau of Reclamation, Bonneville Power Administration, Natural Resource Conservation Service, U.S. Environmental Protection Agency, National Oceanic and Atmospheric Administration and other Federal agencies. The analysis of hydroelectric facilities and other dam structures in the region also relied on information from the Northwest Power and Conservation Council, the Pacific Northwest Utility Coordinating Council and utilities owning dams in bull trout proposed critical habitat (Avista Corporation, Eugene Water and Electric Board, Pacificorp and Portland General Electric). Native American Tribes, State agencies and industry organizations (e.g. American Forest Resource Council, American Farm Bureau and Northwest Mining Association) were also contacted, as were numerous individuals in the private sector on topics ranging from irrigation to forestry to bull trout conservation. Census Bureau and other Department of Commerce data were relied on to characterize the regional economy.

Q. How can I comment on the draft economic analysis and the proposed critical habitat rule?
Written comments can be mailed or hand-delivered to John Young, Bull Trout Coordinator,

U.S. Fish and Wildlife Service, 911 N.E. 11th Avenue, Portland, Oregon 97232; faxed to 503-231-6243; or submitted by e-mail to: R1BullTroutCH@r1.fws.gov. Please submit electronic comments in an ASCII file format and avoid the use of special characters and encryption. Please also include "Attn: RIN 1018-A152" and your name and return address in your e-mail message**. If you do not receive a confirmation from the system that we have received your e-mail message, please contact John Young at 503/231-6194. If our Internet connection is disrupted, please submit your comments by mail or fax (numbers above). They must be received by May 5, 2004.**

Q. What if I already commented on the critical habitat proposal?
Comments previously submitted need not be resubmitted as they will be incorporated into the public record as part of this comment period and will be fully considered in preparation of the final rule.