

0030831

**From:** [Mansfield, Carol A.](#)  
**To:** [Doug\\_Wetmore@nps.gov](mailto:Doug_Wetmore@nps.gov); [Mike\\_Murray@nps.gov](mailto:Mike_Murray@nps.gov)  
**Cc:** [Mansfield, Carol A.](#)  
**Subject:** RE: IMPORTANT: Fw: SBA Comments: DOI/NPS Proposed Rule -- Cape Hatteras National Seashore--Off-Road Vehicle Management  
**Date:** 06/08/2011 08:29 AM  
**Attachments:** [YELL Draft Economic Analysis Proposed Rule Sec 6 rev.doc](#)

---

Hi Doug,  
SBA recognizes that we don't have to do the initial screening in their letter. SBA seems to be saying they would like us to anyway. For Yellowstone, that park has always decided to do the small business impact analysis, even though it is not required because the impacts are indirect in Yellowstone as well. I attached the IRFA we just submitted as part of the latest benefit-cost analysis for Yellowstone so you can see what they are like.

I'm not sure how you and Mike feel, but it is true that (1) the IRFA isn't required (which SBA acknowledges), (2) in the benefit-cost analysis we discuss the fact that most of the businesses are small and that the impacts will fall disproportionately on the businesses that serve people who visit the specific ramps/areas most affected by the rule. SBA quotes from the benefit-cost the statements that we made about the impacts on small businesses, and (3) it has been 3 years under the closures and the visitation and economic data suggest that there have not been big declines.

The tax data are not adjusted for inflation, but inflation has been pretty low. The economic data doesn't cover bait and tackle shops, do you know if there have been business closures in the last 2 years? Have businesses contacted the park to say that the ORV rules are forcing them to close down?

Carol

Carol Mansfield, Ph.D.  
Senior Economist, RTI International  
Social and Statistical Sciences Division  
3040 Cornwallis Road | Durham, NC 27709  
P 919-541-8053  
F 919-541-6683  
[carolm@rti.org](mailto:carolm@rti.org)