U.S. SMALL BUSINESS ADMINISTRATION
OFFICE OF ADVOCACY
REGULATION • RESEARCH • OUTREACH

July 13, 2026

VIA ELECTRONIC SUBMISSION

The Honorable Stevan Pearce, Director
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Re: Revision of Regulations for Grazing Administration, Exclusive of Alaska, Docket No. BLM-2026-0001

Dear Director Pearce:

On May 12, 2026, the Bureau of Land Management (BLM) published a proposed rule titled "Revision of Regulations for Grazing Administration, Exclusive of Alaska."[1] This letter constitutes the Office of Advocacy's (Advocacy) public comments on the agency's proposal.

Advocacy strongly supports the proposed rule. For over 30 years, small ranching operations across the western United States have operated under a regulatory framework that has constrained operational flexibility, discouraged investment, and failed to keep pace with the evolving needs of the industry. The proposed rule addresses these longstanding concerns in a meaningful and substantive way. Small business stakeholders who participated in Advocacy's June 30, 2026, roundtable expressed broad, consistent support for the rule's key provisions. Advocacy reiterates that support here and offers the following recommendations to strengthen the rule's impact on small businesses.

I. The Office of Advocacy

Congress established the Office of Advocacy under Pub. L. 94-305 to represent the views of small entities before federal agencies and Congress. Advocacy is a voice within the federal government that seeks to ensure small business concerns are heard in the federal regulatory process. Advocacy also works to ensure that regulations do not unduly inhibit the ability of small entities to compete, innovate, or comply with federal laws. The views expressed by Advocacy do not necessarily reflect the views of the Small Business Administration (SBA) or the Administration.

[1] 91 Fed. Reg. 26852 (May 12, 2026).

The Regulatory Flexibility Act (RFA), as amended by the Small Business Regulatory Enforcement Fairness Act (SBREFA),[2] gives small entities a voice in the rulemaking process.[3] If a rule is not expected to have a significant economic impact on a substantial number of small entities, agencies may certify it as such and submit a statement of the factual basis for such a determination that adequately supports its certification.[4]

The Small Business Jobs Act of 2010 requires agencies to give every appropriate consideration to comments provided by Advocacy.[5] The agency must include a response to these written comments in any explanation or discussion accompanying the final rule's publication in the Federal Register, unless the agency certifies that the public interest is not served by doing so.[6]

Advocacy's comments are consistent with Congressional intent underlying the RFA, that "[w]hen adopting regulations to protect the health, safety, and economic welfare of the nation, federal agencies should seek to achieve statutory goals as effectively and efficiently as possible without imposing unnecessary burdens on the public."[7]

II. Background

BLM manages approximately 245 million acres of public land across the United States, though most of the land within its jurisdiction is in the western states. Of the land managed by BLM, about 155 million acres are available for livestock grazing under the agency's grazing program, encompassing more than 21,000 allotments.[8] Grazing permits and leases authorize livestock producers, predominantly small, family-owned ranching operations, to graze cattle, sheep, goats, and other livestock on federal lands.

According to the Department of the Interior, grazing on public lands generates roughly $1.5 billion in direct economic impact and about $8.58 billion in combined ecosystem and economic value for western communities.[9] More than 60 percent of western beef cattle and over 50 percent of breeding sheep graze on public lands, making BLM grazing permits central to the economic viability of small ranching operations throughout the West.[10] For many of these small operators, the loss of a grazing permit would effectively mean the end of their ranching business.

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[2] Pub. L. No. 104-121, tit. II, 110 Stat. 857 (1996) (codified in scattered sections of 5 U.S.C. §§601-612).
[3] 5 U.S.C. § 603.
[4] *Id*. § 605(b).
[5] Small Business Jobs Act of 2010, Pub. L. No. 111-240, §1601, 214 Stat. 2551 (codified at 5 U.S.C. § 604).
[6] *Id.*
[7] Regulatory Flexibility Act, Pub. L. No. 96-354, 94 Stat. 1164 (1980) (codified at 5 U.S.C. §§ 601-612).
[8] U.S. Dep't of the Interior, Bureau of Land Mgmt., *Livestock Grazing on Public Lands*, https://www.blm.gov/programs/natural-resources/rangelands-and-grazing/livestock-grazing (last visited July 9, 2026).
[9] Pub. Lands Council, *Understanding the Value of Grazing*, https://publiclandscouncil.org/Media/PLC/Docs/value-of-grazing-2025_1.pdf (last visited July 9, 2026).
[10] *Id*.

BLM's grazing regulations were last comprehensively revised in 1995.[11] Efforts to revise them in 2006 were successfully challenged in court and permanently enjoined, so the regulations currently in effect largely reflect the 1995 framework, which is now more than 30 years old.[12] Since 1995, several important developments have reshaped the grazing regulatory landscape. In 2014, Congress amended the Federal Land Policy and Management Act,[13] revising how environmental reviews are conducted for permit renewals. Two years later, Government Accountability Office issued a report recommending that BLM revise its regulations to better document and address unauthorized grazing.[14]

In response to these developments, BLM published its proposed rule, "Revision of Regulations for Grazing Administration, Exclusive of Alaska," on May 12, 2026. This proposal seeks to modernize the grazing framework by increasing operational flexibility for permittees, aligning the regulations with applicable court decisions, and removing longstanding structural barriers that have constrained effective rangeland management and discouraged investment in grazing allotments. BLM estimates that the proposed rule is expected to reduce time and operational costs for small entities who hold permits to graze on BLM lands. Key provisions of BLM's proposal include:

- *Land Health Standards*: Applies the land health regulations to all BLM programs, not just livestock grazing. It requires BLM to complete a causal factor determination within six months of identifying land health concerns, identifying all land uses or other factors that prevent achievement of rangeland health standards, rather than focusing solely on permitted grazing activity.

- *Definitions and Permit Eligibility*: Revises the definition of Animal Unit Month (AUM)[15]to clearly encompass sheep, goats, and other livestock in addition to cattle. It also revises the definition of "base property" to include land with livestock operation facilities. It adds a new definition of "beginning rancher (mentee)" so that eligibility is not limited to sons and daughters of current permittees but also extends to anyone who has never held a grazing permit and has not operated a farm or ranch for more than ten years.

- *Operational Flexibility*: Allows BLM to approve changes to the period of use so a permittee could graze up to 21 days before and 21 days after the dates specified in the permit terms and conditions. It also expands the grounds for temporary nonuse to include fuels management and the personal or business needs of the permittee.

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[11] U.S. Dep't of the Interior, Bureau of Land Mgmt., *Department of the Interior Proposes Modernizing Grazing Regulations to Support Ranchers and Healthy Rangelands* (June 1, 2026), https://www.blm.gov/press-release/department-interior-proposes-modernizing-grazing-regulations-support-ranchers-and.

[12] *Id.*

[13] Federal Land Policy and Management Act of 1976 § 402(c)(2), 43 U.S.C. § 1752(c)(2) (2018), as amended by Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015, Pub. L. No. 113-291, div. B, tit. III, § 3023, 128 Stat. 3292, 3766 (2014).

[14] U.S. GOV'T ACCOUNTABILITY OFF., GAO-16-559, UNAUTHORIZED GRAZING: ACTIONS NEEDED TO IMPROVE TRACKING AND DETERRENCE EFFORTS (2016).

[15] The Animal Unit Month is the standard unit used to measure forage demand and grazing capacity. It is based on the forage required by a 1,000-pound cow with a calf for one month, which is approximately 750 pounds of air-dry forage.

- *Targeted Grazing*: Defines "targeted grazing" and explicitly recognizes such grazing as a fuel reduction and fuel treatment activity. This includes creating strategic fuel breaks and reducing fine fuel height and loading.
- *Administrative Appeals and Automatic Stay*: Changes the current default so that an appeal of a grazing decision would automatically suspend the decision while the appeal is pending, unless BLM specifies otherwise. If finalized, the rule would no longer require a separate petition for a stay.
- *Interested Public*: Revises the definition of "interested public" to require that any party seeking to participate in grazing management decisions must demonstrate a cognizable interest in the management of the specific allotment at issue.

III. Advocacy Outreach and Summary of Small Entity Feedback

On June 30, 2026, Advocacy convened a virtual small business roundtable to gather input from small business stakeholders on the proposed rule. Participants included individual ranching permittees operating across Montana, Nevada, Wyoming, and Arizona, as well as representatives of grazing permit holders across the 16 western states where federal lands grazing is most prevalent. Stakeholders present included small businesses that specialized in cattle, sheep, and goat operations. The feedback received was uniformly supportive of the proposed rule and BLM's changes to the grazing regulatory framework. Advocacy commends BLM for proposing updates that genuinely reflect the on-the-ground concerns of small business permittees and for creating meaningful opportunities for small business participation in the rulemaking process.

IV. Small Business Support of the Proposed Rule

A. Strong Support for Operational Flexibility Provisions

Small business stakeholders express strong, uniform support for the proposed rule's operational flexibility provisions, particularly the 21-day buffer for livestock turn-out and turn-in on allotments and the expanded framework for temporary non-renewable permits. These provisions address one of the most persistent sources of financial loss for small ranching operations: the inability to respond to time-sensitive rangeland conditions under a rigid, decades-old permitting structure.

One Nevada rancher with over 50 years of permitted grazing experience explained that it can take BLM 45 to 65 days to approve temporary grazing adjustments, a delay that often causes ranchers to miss critical windows to utilize seasonal forage, including cheatgrass.[16] At the right time of year, cheatgrass provides valuable feed and, if grazed timely, reduces wildfire fuel loads. The 21-day flexibility buffer directly addresses this problem by giving forage plants time to

[16] *See* U.S. Dep't of Agric., Agric. Rsch. Serv., *Targeted Grazing, A Successful & Low-Cost Method to Manage Cheatgrass When Timed Properly* (Oct. 1, 2024), https://www.ars.usda.gov/news-events/news/research-news/2024/targeted-grazing-a-successful-low-cost-method-to-manage-cheatgrass-when-timed-properly/. Cheatgrass (Bromus tectorum) is an annual grass native to Eurasia that has become one of the most problematic invasive species in the western U.S. This invasive species outcompetes native vegetation in the spring, and after completing its growth, it dries into fine fuels during the summer, leading to more frequent, widespread wildfires.

regrow and recover from grazing, while also ensuring that turn-out and turn-in schedules align with biological recovery and parasite control. Small ranching operations are fundamentally dependent on weather, drought conditions, and forage availability, factors that do not align with fixed permit dates. Providing operational latitude at the margins of permitted grazing seasons allows small operators to manage their herds responsibly in an economically feasible manner without requiring formal BLM action for each minor adjustment.

Similarly, the expanded framework for temporary non-renewable permits will allow small operators to pursue specific land management objectives, including fuel reduction, post-fire remediation, and management of invasive species. Current regulations do not accommodate these objectives in a timely or accessible way. Stakeholders noted that many opportunities to support land management had gone unrealized for years simply because the permit structure did not provide a viable pathway to accomplish these objectives.

Given the emphatic support from small businesses regarding the operational flexibility provisions, Advocacy urges BLM to finalize these changes provision as proposed.

B. Unburdening Small Business With Multi-Use Causal Factor Analyses

Among the most significant and broadly supported changes in the proposed rule is the expansion of land health standards to reflect a multi-use causal factor analysis where each assessment considers all contributors to rangeland condition rather than attributing degradation solely to permitted livestock grazing. Under the current regulatory framework, BLM's primary response to land health concerns is to adjust permitted grazing, even when the underlying degradation is caused by other factors unrelated to livestock, such as recreational use, off-road vehicles, wildlife, or drought. Because of this faulty assumption, small ranching operations have faced permit reductions, allotment closures, and AUM suspensions based on rangeland conditions they neither caused nor were able to control.

The financial impact of BLM's unwarranted correlation between grazing and land degradation is substantial. One permittee estimated annual losses of approximately $75,000 in beef cattle production (about 30 calves at $2,500 per head) due to administrative grazing exclusions on a single operation, along with an additional $25,000 per year to maintain exclusionary fencing around areas where grazing has been prohibited without sufficient scientific justification.

The proposed rule's multi-use causal factor analysis would help correct this inequity by requiring BLM to identify the actual causes of land health concerns before restricting permitted activities. This approach is both scientifically sound and fair to small business permittees who have invested heavily in their operations and in the condition of their allotments. Ranchers should not be required to guess the cause of land health issues and should be able to trust that BLM can, according to its experience in land management, properly diagnose causes of land degradation. The rule properly places the obligation on BLM to specifically identify any deficiencies and provide ranchers with the information needed to correct them. As emphasized by stakeholders, there are numerous ecological benefits associated with accurate causal attribution. When the true source of degradation is identified, the appropriate remedy can be applied, leading to better land health outcomes overall.

Due to its anticipated benefits for small businesses and land health management at large, Advocacy strongly supports this provision and urges BLM to finalize it as proposed.

C. Targeted and Prescribed Grazing as Wildfire Mitigation Tools: New Opportunities for Small Businesses

Small business stakeholders expressed strong support for the proposed rule's explicit recognition of targeted and prescribed grazing as tools for wildfire prevention and fuels management. This provision creates a meaningful new business opportunity for small ranching operations in high fire-risk areas throughout the West, a category that has grown substantially in recent years and is expected to expand further.

Managed livestock grazing is an effective, cost-efficient way to reduce dry grass and other fine fuels that feed rangeland and wildland fires. In high-precipitation years or in areas prone to invasive annual grasses, well-timed, strategic grazing can significantly lower fuel loads before fire season. Stakeholders noted that federal and state agencies currently spend substantial resources on alternative fuel management methods, such as herbicide application to invasive grasses. However, grazing can replace or supplement these methods at a lower cost and with co-benefits, including improved forage quality, enhanced wildlife habitat, and reduced invasive seed banks.

Small businesses find the cost comparison to be compelling: grazing-based fuels reduction is far less expensive than fire suppression or post-fire landscape recovery, both for the federal agencies that manage public lands and for the ranching operations and rural communities that bear the downstream costs of catastrophic fire. Stakeholders emphasized that enabling small ranching operations to participate in targeted grazing contracts would benefit individual permittees and advance the broader public interest in fire prevention. One stakeholder, the National Grasslands Association (NGA), stated grazing generates an estimated $8.58 billion in ecosystem value. NGA stressed that keeping ranchers on the land supports not only their own operations, but also the wider rural economies of the West, including local schools, dealerships, and other small businesses that depend on a stable ranching base.

Advocacy urges BLM to implement the targeted grazing framework with clear, accessible procedures that allow small ranching operations, not only larger commercial operators, to participate in fuels management contracts.

D. The Importance of Permit Transferability to the Long-Term Viability of Small Ranching Operations

Small business stakeholders also expressed strong support for the proposed rule's provisions aimed at helping beginning ranchers and simplifying the transfer of permits to new or younger operators. These provisions address a structural problem that threatens the long-term viability of small ranching: barriers to entry and succession are so significant that many operations cannot continue beyond a single generation.

Cattle inventories in the United States are currently at their lowest levels in approximately 70 years.[17] The difficulty of entering or remaining in the ranching business, driven by high cattle prices, rising land costs, and regulatory complexity, has materially contributed to this decline. Permit transferability has been a particular bottleneck, preventing new operators from entering the market. Stakeholders described the current process for transferring a permit to a hired hand, niece or nephew, or other non-direct-successor as onerous, slow, and costly, even when the incoming operator is experienced and the outgoing permittee strongly supports the transfer.

The existing surcharge for beginning ranchers operating under the supervision of an existing permittee is another barrier. Stakeholders emphasized that the surcharge functions as a financial penalty with no clear policy benefit, and that it actively discourages young operators from gaining practical, on-the-ground experience. These issues extend beyond individual families. When small ranching operations cannot be transferred and instead are forced to shut down, grazing allotments often fall into non-use or vacancy, which then reduces local tax revenue, jobs, and supply-chain activity, and weakens rural communities that depend on active ranch operations.

If finalized, the proposed rule would help alleviate these problems by clarifying that permits are intended for production-oriented livestock operations. These provisions would also expand eligibility beyond the current "sons and daughters" limitation to include any beginning rancher who has operated a ranch for fewer than ten years and has never held a permit, thereby removing barriers to entry in the ranching market. By broadening who can qualify and removing unnecessary surcharges, the rule would make it easier for established operators to mentor new entrants, transfer permits to capable successors, and build herd capacity over time. These changes support smoother generational transitions, keeping allotments in active use, and strengthening the long-term stability of small ranching businesses and the communities that rely on them.

When implementing this revision, small business stakeholders also urge BLM to address suspended AUMs that stem from violations by prior permittees and have not been reinstated for subsequent owners who were not involved in those violations. One permittee who spoke during the roundtable estimates that roughly 60,000 AUMs are currently suspended in Nevada alone. As part of its broader goals of expanding access and encouraging new entrants to the industry, BLM should consider establishing clear regulatory guidance and a straightforward process for new permittees to seek reinstatement of suspended AUMs for which they bear no responsibility.

E. Strong Support for the Appeals Automatic Stay Provision

Small business stakeholders favor the proposed rule's change to the default arrangement for administrative appeals, under which BLM grazing decisions currently take effect immediately even while a permittee is actively challenging them. Under the proposal, filing an appeal would automatically stay the effectiveness of a BLM grazing decision without requiring the permittee to submit a separate petition for a stay.

[17] Am. Farm Bureau Fed'n, U.S. Cattle Inventory Smallest in 73 Years (Feb. 5, 2024), https://www.fb.org/intel/markets/u-s-cattle-inventory-smallest-in-73-years.

Under the existing framework, a small ranching operation facing an adverse decision, such as a substantial AUM reduction or an allotment closure, must comply with that decision while also absorbing the cost and burden of the appeals process. For operations with limited financial reserves, this often makes pursuing an appeal unrealistic, effectively shielding BLM decisions from review regardless of their merits.

The automatic stay provision meaningfully levels the playing field for small permittees in disputes with the agency. Stakeholders emphasized that the ability to maintain the status quo while an appeal is pending would allow small operations to continue functioning without risking irreversible financial harm from a decision that might ultimately be overturned.

Because of its anticipated promotion of small business resiliency, Advocacy strongly supports this provision and urges BLM to finalize it as proposed.

V. Small Business Stakeholder Input on Additional Provisions in the Proposed Rule

While small business feedback on the proposed rule was broadly supportive, stakeholders provided specific recommendations for BLM's consideration to further improve the grazing regulatory framework.

A. Expedite Range Improvement Permit Approvals

One of the most consistent operational concerns raised by small business stakeholders was the significant time and cost burden associated with BLM's approval process for minor range improvements, including water infrastructure, pipelines, spring developments, fencing, and corrals. Stakeholders described routine timelines of two years or more to obtain BLM approval for basic water line installations, including buried pipelines that would improve distribution of both livestock and wildlife across allotments.

In at least one case, a permittee was unable to obtain approval to cross a BLM parcel with a water line and was forced to route the infrastructure entirely on private land at substantially greater cost, an option not available to all operators. In another case, stakeholders described wild horse activity devastating springs and water sources, with permittees unable to obtain timely BLM approval to install protective water development infrastructure.

These delays have direct, quantifiable costs. When water infrastructure cannot be developed or improved on a timely basis, livestock are concentrated at existing water sources, overgrazing those areas while leaving other portions of the allotment underutilized. This reduces the total productive capacity of the allotment, increases per-head feed costs, and contributes to uneven land health outcomes, the opposite of what both BLM and permittees want.

One Wyoming rancher estimated annual losses of $150,000 to $200,000 per operation, depending on cattle market conditions, attributable solely to the inability to fully utilize permitted allotments due to National Environmental Policy Act review backlogs on range improvement projects. These losses are incurred year after year while approval timelines remain unresolved.

Stakeholders expressed support for BLM developing a streamlined categorical exclusion process for improvement projects that are similar in scope and location to previously approved actions. Where a field office has approved five prior water line projects, a sixth of comparable scope and impact should not require the same full review timeline.

B. Implement Outcome-Based Standards and Guidelines[18]

Stakeholders urge BLM to replace the current prescriptive Standards and Guidelines framework with an outcome-based, science-driven approach that evaluates actual grazing impacts over time and grounds management decisions in observed data rather than fixed thresholds. They reported that, in practice, the existing Standards and Guidelines have been used to justify grazing exclusions and reductions that are not well supported by on-the-ground conditions. In written feedback submitted to Advocacy following the roundtable, one stakeholder estimated that more than 20 miles of riparian areas on a single operation have been excluded from grazing through administrative actions not grounded in current science, resulting in approximately $75,000 per year in lost beef production and $25,000 in annual exclusionary fencing costs. Stakeholders argued that an outcome-based framework would produce better land health results while easing unnecessary regulatory burdens on small permittees.

C. Restore and Strengthen Section 4 Permits

Stakeholders also have concerns regarding Section 4 permits under the Taylor Grazing Act, which historically allowed permittees to retain ownership of permanent range improvements they financed.[19] The Federal Land Policy and Management Act weakened this protection by granting the Secretary of the Interior discretion over range improvement permit authorizations. Permittees cited specific cases in which land exchanges with private entities failed to fully compensate permittees for improvements they had paid for because those improvements no longer carried Section 4 ownership status. One permittee estimated losing capacity for more than 200 head of cattle because of a land exchange in which they were not fully compensated for their improvements due to the lack of Section 4 protection. Stakeholders urged BLM to consider whether regulatory or administrative measures could restore meaningful ownership protections for permittee-funded improvements as part of, or in parallel with, this rulemaking.

D. Simplify Rules and Regulations

Stakeholders also noted some of BLM’s proposed rules span more than 100 pages, creating a significant comprehension and compliance burden for small permittees who may not have legal or regulatory expertise. Roundtable attendees expressed support for BLM moving directive-level material into handbooks or guidance documents, streamlining the regulatory text to focus on core requirements, and ensuring that the final rule is drafted in plain language that individual ranchers and small business operators can understand and apply without professional legal assistance.

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[18] 43 C.F.R. § 4180.

[19] *See* Taylor Grazing Act, ch. 865, § 4, 48 Stat. 1269, 1270–71 (1934) (codified as amended at 43 U.S.C. ch. 8A) (authorizing permits and cooperative arrangements for the construction and use of range improvements and providing for compensation to prior occupants for improvements they have made).

VI. Small Entities Will Benefit from Additional Information on the Proposed Rule's Benefits

Advocacy strongly supports the proposed rule and commends BLM for developing a regulatory framework that meaningfully addresses the operational realities of small ranching operations. To further strengthen the rule's impact, Advocacy encourages BLM to quantify its benefits to the greatest extent possible in the Final Regulatory Flexibility Analysis (FRFA). By quantifying the rule's benefits to the greatest extent possible. BLM will further strengthen support for these proposed changes.

Advocacy encourages BLM to include in its FRFA analysis estimates of: (1) cost savings associated with the 21-day turn-out/turn-in flexibility and the reduced need for formal BLM approvals for minor seasonal adjustments; (2) projected revenue from targeted grazing contracts that would become available to small permittees under the new framework; and (3) the reduction in unwarranted permit reductions expected from applying the multi-use causal factor analysis to land health standards. Advocacy welcomes the opportunity to work with BLM on this analysis.

In addition, section 212 of SBREFA requires that, for any rule that requires a FRFA, the agency prepare and publish a small-entity compliance guide.[20]Advocacy encourages BLM to issue this guide concurrently with publication of the final rule, post it online, distribute it to relevant industry groups, and report on it annually to Congress.

Finally, Advocacy encourages BLM to prioritize consistent implementation of the final rule across all field offices. Stakeholders noted that regulatory changes made at the national level do not always translate uniformly to local BLM offices, and that inconsistent implementation creates its own burden for small permittees who must navigate varying approaches across districts. The benefits this rule promises for small ranching operations can only be fully realized if they are applied consistently on the ground.

VII. Conclusion

Advocacy commends BLM for undertaking this long-overdue modernization of its grazing regulations and for creating meaningful opportunities for small business stakeholders to participate in the rulemaking process. The proposed rule reflects genuine engagement with the operational realities of small ranching operations, and the small business community has responded with broad, substantive support. Advocacy appreciates the opportunity to convey that support here and urges BLM to finalize the rule.

Advocacy commends BLM for its engagement with the small business community. We look forward to working with BLM to ensure that the final rule reflects the interests of the small businesses that are the backbone of western rangeland communities. If you have questions or

[20] U.S. SMALL BUS. ADMIN., OFF. OF ADVOC., A GUIDE FOR GOVERNMENT AGENCIES: HOW TO COMPLY WITH THE REGULATORY FLEXIBILITY ACT (Aug. 2017) https://advocacy.sba.gov/wp-content/uploads/2019/07/How-to-Comply-with-the-RFA-WEB.pdf.

require additional information, please contact me or Assistant Chief Counsel Shanerika Flemings at (202) 205-3651 or shanerika.flemings@sba.gov.

Respectfully submitted,

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