

**Supporting Statement A for Paperwork Reduction Act Submissions**  
**North American Breeding Bird Survey**  
**OMB Control Number: 1028-0079**  
**Current Expiration Date: 5/31/2008**  
**Terms of Clearance: None**

**General Instructions**

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

**A. Justification**

***1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.***

The Fish and Wildlife Conservation Act as amended in 1988 requires that the Secretary of the Interior monitor and assess migratory nongame bird populations, determine the effects of environmental changes and human activity, identify birds likely to be candidates for endangered species listing, and identify conservation actions that would prevent listing from being necessary. All of these activities assist in fulfilling the Secretary's responsibilities under the Migratory Bird Treaty Act and the Migratory Bird Conservation Act.

Scientists and Federal, State, and local agencies use data from the North American Breeding Bird Survey (BBS) to identify bird populations demonstrating significant decline in order to direct conservation and research efforts towards those species before their numbers reach critically low levels. The Balanced Budget Downpayment Act authorizes the U.S. Geological Survey to manage the Breeding Bird Survey program.

Migratory Bird Treaty Act (16 U.S.C. §§ 703-712, July 3, 1918, as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986 and 1989)

Migratory Bird Conservation Act (16 U.S.C. §§ 715-715r, February 18, 1929, as amended 1935, 1961, 1962, 1966-1968, 1970, 1973, 1976, 1978, 1983, 1984, 1986, 1988 and 1989)

The Fish and Wildlife Conservation Act (16 U.S.C. §§ 2901-2911, September 29, 1980, as amended 1986, 1988, 1990 and 1992)

The Balanced Budget Downpayment Act, I (110 Stat. 26).

***2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current***

**collection. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]**

Respondents record all bird species and numbers of individuals detected during 50 3-minute point counts. These data provide an index of population abundance that can be compared through time.

The USGS Patuxent Wildlife Research Center currently provides BBS population trend estimates and raw population data for more than 400 bird species via the Internet ([www.pwrc.usgs.gov/bbs/](http://www.pwrc.usgs.gov/bbs/)). These data, along with other indicators, are used by the U.S. Fish and Wildlife Service, to assess and set avian species management priorities across the Nation. State governmental agencies also rely heavily on BBS data to regulate mourning dove hunting seasons and to populate State Natural Heritage program databases. In addition, BBS data are used by researchers, educators, and the general public to define research goals and to learn more about avian distributions and population fluctuations. For example, more than 300 scientific papers have relied heavily on BBS data for publication. Information on species detected and number of individuals are recorded at preestablished locations to allow population trends for each bird species to be calculated through time.

In the late 1980s, BBS data were instrumental in focusing research and management action on neotropical migrant species, and on grassland species in the mid-1990s through 2007.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

In 1997, the BBS switched from an entirely paper driven process to an electronic process whereby participants may, and are encouraged, to submit their data via the Internet. At this time approximately 50 percent of the annual data are submitted electronically via the web. All other data are submitted on paper forms, the data from which are entered into the BBS database via optical character recognition. Data, trend estimates, and other information regarding the BBS are disseminated via the BBS World Wide Web site.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

No other organization gathers this type of avian information at the national scale like the North American Breeding Bird Survey. The Christmas Bird Count and E-bird are the most similar programs but they lack the scientific sampling design of the BBS, and in the case of the Christmas Bird Count sample winter populations, which reduces the utility of their data. Numerous other national avian monitoring initiatives (i.e., Monitoring Avian Productivity and Survivorship, Colonial Waterbird Monitoring, Marsh Bird Monitoring) have also been established, but they are designed to complement the BBS rather than duplicate its efforts. These programs are focusing on species that are currently not well monitored by the BBS sampling methodology.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This information does not affect small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Not collecting this information would leave the Federal Government unable to characterize rates of change of many migratory nongame populations of birds and unable to explore the causes of their decline. Thus the Secretary of the Interior would be unable to fulfill his/her legal requirements under the Acts listed in question 1.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**(a) requiring respondents to report information to the agency more often than quarterly.**

Not applicable in this collection.

**(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

Not applicable in this collection.

**(c) requiring respondents to submit more than an original and two copies of any document.**

Not applicable in this collection.

**(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.**

Not applicable in this collection.

**(e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

Not applicable in this collection.

**(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.**

Not applicable in this collection.

**(g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

This collection does not include a pledge of confidentiality.

**(h) requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This collection does not require respondents to submit proprietary, trade secret, or other confidential information.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past 3 years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

***Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.***

As required in 5 CFR 1320.8(d), the USGS published a 60-day notice in the Federal Register on March 19, 2008 (73 FR 14832). We received one comment. The commenter suggested that annual data collection was unnecessary and advocated estimating population size from year to year based upon the assumption that populations are declining 10% per year. Additional statements were not specifically relevant to the information collection requirements.

Response: Established in 1966, the BBS program has provided scientifically rigorous national estimates of relative abundance and population trends for hundreds of bird species for over four decades. The information collected by the BBS is central to nongame avian conservation and management efforts in North America, informing science-based avian conservation and management actions by Federal and State agencies and private entities. Analyses of BBS data have identified that not all bird species are declining. In fact, over 40 percent of the bird populations monitored by the BBS are increasing or are stable in numbers. Those that are decreasing are not necessarily decreasing throughout their entire ranges or by as much as 10 percent per year. Thus, through collection of actual population data annually, the BBS is able to identify species in areas most in need of intensive research and management efforts, allowing for efficient targeted use of Federal funds for species conservation and management efforts. The BBS also acts as an early warning system, identifying declining species long before they reach critically low levels. Finally, BBS data are collected by USGS volunteers highly skilled in avian identification making the BBS extremely cost-effective.

In 2007, the BBS developed a strategic plan (<http://pubs.usgs.gov/circ/2007/1307/>) based on the review of the program and comments by BBS stakeholders, including USGS and non-USGS representatives. The plan outlined 36 action items for maintaining and improving the BBS for avian conservation and management. No recommendations were made to reduce the amount of collection or types of data currently collected. In fact, numerous recommendations were made to collect additional information that would ultimately improve the scientific utility of the data. In addition, BBS partner agencies, the Canadian Wildlife Service and Mexico's National Commission for the Knowledge and Use of Biodiversity, are involved in decisionmaking about data collection.

Examples of contacts between 2004 and 2008 that identify persons who were consulted on this information collection are listed below.

- Connie Downes, Canadian BBS Coordinator, Canadian Wildlife Service, National Wildlife Research Center, 1125 Colonel By Drive, Ottawa, Ontario, Canada K1A 0H3. Phone: 613-998-0490.
- Neal D. Niemuth, USFWS Habitat and Population Team, 3425 Miriam Avenue, Bismarck, ND 58501. Phone: 701-250-4413.
- Todd Schneider, Georgia BBS Coordinator, Georgia Department of Natural Resources, Wildlife Resources Division, 116 Rum Creek Drive, Forsythe, GA 31029. Phone: 478-994-1438.
- Sartor O Williams, III, New Mexico BBS Coordinator, New Mexico Department of Game and Fish, 1819 Meadowview Drive, Albuquerque, NM 87104-2511. Phone: 505-247-3731.
- Dan Brauning, Pennsylvania BBS Coordinator, Pennsylvania Game Commission, 61 Windy Lane, Montgomery, PA 17752. Phone: 570-547-6938.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

A nonmonetary award (valued at less than \$15.00) and certificate are provided to participants upon achieving 10, 20, and 30 years of participation in the BBS program. A nonmonetary award is also provided to participants upon the completion of their 50th route. These awards are presented to participants as a form of recognition and appreciation for the outstanding work they have done for the program over the years.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

No assurance of confidentiality is given to participants.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The collection does not include sensitive or private questions.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**(a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

**(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

***(c) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.***

Burden estimate is based upon the time to conduct and enter data from BBS routes. Each survey takes approximately 11 hours to complete which includes driving to and from the site, scouting the route, actual data collection, entry of data via the Internet, and data verification. A survey route is sampled once per year. Each route has one respondent per year. The annual number of respondents will vary, but the average number of respondents would be 2,500. Total burden hours is 27,500 hours (calculated by 2,500 respondents x 11 hours per response = 27,500 burden hours). The hours provided per survey is an average of estimates based on information provided by respondents from 2005 to 2008.

Total annualized cost for this collection is estimated to be \$742,500. We used the Bureau of Labor Statistics (BLS) website to calculate the hourly wage and multiplied by 1.4 for benefits (<http://www.bls.gov/bls/wages.htm>). We used the figures for the national average hourly pay rate for all occupations from the June 2006 estimate. See table below.

Respondents	Hourly Pay Rate (\$/hr est.)	Hourly Rate Including Benefits (1.4 x hourly pay rate) rounded	Total Annual Burden Hours	Total Annualized Cost
Individuals	\$19.29	\$27	27,500	\$742,500

***13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).***

***(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.***

***(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.***

*(c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

We estimate the total nonhour burden cost to be \$126,250.

a. Total capital and start-up costs: \$0

The BBS relies on individuals highly skilled in avian identification. Most have been avid birders for at least 6 years before being recruited for the BBS. As avid birders they generally already possess the materials necessary to participate in the BBS.

b. Total operation and maintenance costs: \$126,250.

Estimated average travel to complete one route is 100 miles. Current government rate \$0.505 per mile (<http://www.gsa.gov/>). Total operation and maintenance costs: 100 x \$0.505=\$50.50 x 2,500 respondents equals \$126,250.

**14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Annualized cost to the Federal Government is estimated at \$192,000 based on costs for the below expenses which include actual Federal salaries, estimated benefits cost (1.5 percent of salary), and other associated expenses.

Annual total cost to the Federal Government:

<b>Cost description</b>	<b>Cost</b>
Program administration salary and benefits*	\$135,000
Operational costs	\$25,000
<b>Total project costs</b>	<b>\$160,000</b>
Indirect costs: center overhead (20%) rounded	\$32,000
<b>Annual cost to Federal government</b>	<b>\$192,000</b>

\* The annual Federal salary and benefits cost is \$135,000 (rounded), as calculated from the table below. The Federal cost is broken out in the below table using the 2008 Office of Personnel Management Washington-Baltimore-Northern Virginia pay schedule. Student contractor wage rate (\$14.63) was taken from USGS 2008 Pricing Table for Student Services. Operational costs cover student contractors' time spent on the information collection, calculated as: 800 hours x \$14.63/hour = \$12,000 (rounded), and expenses related to printing (\$3,000, rounded,) and mailing of materials (\$10,000, rounded).

Federal Staff	Grade	Hourly Pay Rate	Hourly Pay Rate including Benefits (Hourly Pay Rate x 1.5))	Percent of Staff Time Spent on Collection	Number of Hours (2080 hours =1 FTE)	Cost per federal staff (Hourly Pay Rate incl. Benefits x Number of Hours)
Wildlife Biologist	GS-11, step 5	\$31.61	\$47.42	60%	1248	\$59,180.16
IT Specialist (programmer / database manager)	GS-13, Step 5	\$45.05	\$67.58	20%	416	\$28,113.28
Wildlife Biologist	GS-12, step 5	\$37.89	\$56.84	40%	832	\$47,290.88
				Sum	2,496	\$134,584.32

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

We are reporting 2,500 responses and 27,500 burden hours for this collection. This is an increase of 15,000 burden hours. This adjustment is based on our experience in administering this collection over the past 3 years.

We have increased our nonhour burden cost from \$93,000 to \$126,250. This adjustment is based on the current Government rate for reimbursement of POV mileage.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Trend and relative abundance analyses are conducted annually and presented in an electronic format on the BBS web site ([www.pwrc.usgs.gov/bbs/](http://www.pwrc.usgs.gov/bbs/)). Tabulated data are also freely available via the web. Summary reports are published in scientific journals at periodic intervals, usually every 2 to 5 years. Presentations are made at scientific conferences as appropriate.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable. We will display the expiration date.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.