

**1 Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number XXXX-XXXX

**Hunting and Fishing Application Forms and Activity Reports for
National Wildlife Refuges**

**FWS Forms 3-2354, 3-2355, 3-2356, 3-2357,
3-2358, 3-2359, 3-2360, 3-2361, 3-2362**

50 CFR 25.41, 25.43, 25.51, 26.32, 26.33, 27.42, 30.11, 31.15, 32.1 to 32.72

1. Explain the circumstances that make the collection of information necessary.

The National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee), as amended (Administration Act), and the Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act) govern the administration and uses of national wildlife refuges and wetland management districts. The Administration Act consolidated all the different refuge areas into a single "Refuge System." It also authorizes us to permit public uses, including hunting and fishing, on lands of the Refuge System when we find that the activity is compatible and appropriate with the purpose for which the refuge was established. The Recreation Act allows the use of refuges for public recreation when the use is not inconsistent or does not interfere with the primary purpose(s) of the refuge.

We make provisions in our general refuge regulations (50 CFR 25.41, 25.43, 25.51, 26.32, 26.33, 27.42, 30.11, 31.15, 32.1 to 32.72) for public entry for specialized purposes, including hunting and fishing. These regulations provide the authorities and procedures for allowing hunting and fishing on national wildlife refuges and wetland management districts outside the State of Alaska.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, explain how the collection complies with all applicable Information Quality Guidelines.

There are 389 national wildlife refuges where we administer hunting and/or fishing programs. We plan to collect user information at about 20 percent of these refuges. We need to collect information on hunters and anglers and their success in order to administer and evaluate hunting and fishing programs. Because of high demand and limited resources, we often provide hunt opportunities by lottery, based on dates, locations, or type of hunt. We plan to collect information seasonally, usually once a year at the beginning of the hunting or fishing season. We will not make the information we collect available to the public, except perhaps for final season summaries of the information.

Hunting Applications/Permits

We have developed five forms for our national wildlife refuges to use for hunting applications. Not all species are hunted at each refuge, and some refuges are open to fishing while others are not. To avoid confusion to hunters and to simplify the process, we developed separate applications for refuges to use depending on what opportunities are available. Some refuges may elect to collect the identical information via a nonform format (letter, e-mail, or through discussions in person or over the phone). At some refuges, the forms may also serve as hunting permits. Many refuges offer hunting and fishing activities without collecting any information. We will use the following application forms when we assign areas, dates, and/or types of hunts via a drawing because of limited resources, high demand, or when a permit is needed to hunt:

- FWS Form 3-2354 (Quota Deer Hunt Application).
- FWS Form 3-2355 (Waterfowl Lottery Application).
- FWS Form 3-2356 (Big Game Hunt Application).
- FWS Form 3-2357 (Migratory Bird Hunt Application).
- FWS Form 3-2358 (Fishing/Shrimping/Crabbing Application)

We will collect information from individuals seeking hunting and fishing experiences. We plan to ask for the following information:

- Name of the refuge: Determines what field station will receive and process the information.
- Date of application: We often have application deadlines and this information helps staff determine the order in which applications were received. It also ensures that the information is current.
- Applicant information: We collect name, address, phone number, and email address so we can contact the applicant/permittee either during the application process or after receiving a permit.
- Hunt Date: We ask hunters for their preferences for hunt dates.
- Hunt Location: We ask hunters for their preferences for hunt units, areas, or blinds.
- Hunt methods: Some refuges hold multiple types of hunts, i.e. archery, shotguns, primitive weapons, etc. We ask for this information to identify which opportunity a hunter is applying for.
- Special hunts: Some refuges hold special hunts for youth, hunters who are disabled, or other underserved populations. We ask hunters to identify if they are applying for these special hunts. For youth hunts, we ask for the age of the hunter at the time of the hunt.
- Species: Some refuges allow only certain species, such as moose, elk, or bighorn sheep to be hunted. We ask hunters to identify which species hunt they are applying for.
- Activity: On fishing permits, we ask what type of activity (crabbing, shrimping, etc.) is being applied for.
- Signature and date: To confirm that the applicant understands the terms and conditions of the permit.

Harvest/Fishing Activity Reports

We have developed four activity reports, depending on the species. We will ask users to report on their success after their experience so that we can evaluate hunt quality and resource impacts. We will use the following activity reports, which we will distribute during appropriate seasons, as determined by State or Federal regulations:

- FWS Form 3-2359 (Big Game Harvest Report).
- FWS Form 3-2360 (Fishing Report).

- FWS Form 3-2361 (Migratory Bird Hunt Report).
- FWS Form 3-2362 (Upland/Small Game/Furbearer Report).

We plan to collect the following information:

- Name of refuge and location: We ask this to track responses by location, which is important when we manage more than one refuge or activity area from one office.
- Date: We ask when the hunter/angler participated in the activity. This helps us identify use trends so we have resources available.
- Hours/Time in/out: We ask this to determine how long the hunter/angler participated in the activity. We also use this to track use so we can allocate resources appropriately.
- Name, City, State: We ask for a name so we can identify the user. We ask for residence information to help establish use patterns (if users are local or traveling).
- Number harvested/caught based on species: We ask this to determine the impacts on wildlife/fish populations, relative success (based on hours), and quality of experience.
- Species harvested/caught: We ask this to determine the impacts on wildlife/fish populations, relative success, and quality of experience.
- Comments: We provide hunters/anglers to provide additional comments, recommendations, and information for refuge staff.

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].

The hunting and fishing application forms and report forms will be available online in a fillable format. Most refuges use postmarks to determine eligibility deadlines, therefore we expect that most will require users to fill out the form and return it by mail. Other refuges will prefer to use completely online methods, which will be available. In some cases, the application and permit are on the same form, so review and approval by a refuge official will be necessary. Individuals can return activity reports by e-mail, mail, fax, or dropbox.

4. Describe efforts to identify duplication.

There is no duplication with other information collection activities. The information is specific to the applicant and the use or activity and is not available from any other source. We limit the information requested to the minimum necessary to establish eligibility, resource protection, and to demonstrate the applicants are aware of information they need to know to participate safely and within refuge regulations.

5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.

This collection of information affects only individuals participating in hunting and fishing opportunities on national wildlife refuges. Commercial guides for hunting and fishing are administered through Special Use Permits (FWS Form 3-1383), which is approved under OMB Control No. 1018-0102.

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.

Without the information requested in the hunting and fishing applications, we would be unable to effectively manage and implement hunting and fishing programs on refuges. Refuges often have more potential hunters and anglers interested in opportunities that space and resources allow. Using a quota or lottery system is the only fair way to administer these programs. In other circumstances, permit applications allow refuge staff to identify use trends, determine needs, and enhance public safety. Harvest/creel reports allow refuge staff to determine hunter/angler success, evaluate resource impacts, and improve customer service as use trends are identified. Information is usually collected on either an as-needed basis (one-time or one-season event) or an annual basis.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- * requiring respondents to report information to the agency more often than quarterly;**
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - * requiring respondents to submit more than an original and two copies of any document;**
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - * 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;**
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - * 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; or**
 - * 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.**

No special circumstances exist that require us to collect the information in a manner inconsistent with OMB guidelines.

- 8. Provide 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 (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

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.]

On April 22, 2008, we published a notice in the Federal Register (72 FR 21640) announcing our intent to request that OMB approve this information collection. We solicited public comment for 60 days, ending on June 23, 2008. We did not receive any comments in response to this

notice.

In addition to the Federal Register notice, we contacted the following individuals involved in State hunting and fishing programs to obtain their views on the clarity of instructions, length of time to make application, burden hours, etc.:

| | |
|--|---|
| Tim Mitchusson Game Bird Program Manager New Mexico Department of Game and Fish Socorro, NM 87801 (575) 835-0900 | Dr. Robert McLandress, President, California Waterfowl Association 4630 Northgate Blvd. Suite 150 Sacramento, CA 95834 (916) 648-1406 |
| Susan Langlois, Wildlife Biologist MA Division Fisheries and Wildlife PO Box 408 Westminster, MA 01473-0408 (978) 632-7648 | |

Based on their input, we made minor revisions to clarify instructions, correct errors, and provide for the variety of hunting and fishing experiences. We did not receive any comments on the estimated burden.

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

We do not provide payments or gifts to respondents.

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

We will not provide any assurance of confidentiality, nor will we collect confidential information.

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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate that 815,000 respondents will each complete a hunting application and/or a hunting/fishing activity report each year. The total annual burden for this information collection is 272,500 hours.

- *Applications.* We estimate that on the 389 national wildlife refuges outside the State of Alaska with hunting or fishing programs, we will receive 275,000 application forms each year. We estimate that each form will take 30 minutes to complete for a total of 137,500 annual burden hours.
- *Hunting/Fishing Activity Reports.* We estimate that 140,000 hunters and 400,000 anglers will fill out activity reports each year. Each form will take approximately 15 minutes to complete for a total of 135,000 annual burden hours.

We estimate the total dollar value of the burden hours for this collection to be \$7,360,225 (\$3,713,875 for applications and \$3,646,350 for activity reports).

Hunters and anglers represent a variety of professions and income levels. Using the National Compensation Survey: Occupational Wages in the United States, June 2006, published by the U.S. Bureau of Labor Statistics in June 2007, we estimate the average hourly wage for all occupations across the United States to be \$19.29. We multiplied this by 1.4 (BLS news release USDL 07-1883, December 11, 2007) to account for benefits, resulting in a total hourly cost factor of 27.01.

| Activity | Annual Number of Responses | Completion Time per response | Total Annual Burden Hours | Hourly rate including benefits | Total \$ Value of Burden Hours |
|---|-----------------------------------|-------------------------------------|----------------------------------|---------------------------------------|---------------------------------------|
| FWS 3-2354 Quota Deer Hunt Application | 175,000 | 30 minutes | 87,500 | \$27.01 | \$2,363,375.00 |
| FWS 3-2355 Waterfowl Lottery Application | 90,000 | 30 minutes | 45,000 | \$27.01 | \$1,215,450.00 |
| FWS 3-2356 Big Game Hunt Application | 2,500 | 30 minutes | 1,250 | \$27.01 | \$33,762.50 |
| FWS 3-2357 Migratory Bird Hunt Application | 5,000 | 30 minutes | 2,500 | \$27.01 | \$67,525.00 |
| FWS 3-2358 Fishing/Shrimping/Crabbing Application | 2,500 | 30 minutes | 1,250 | \$27.01 | \$33,762.50 |
| <i>Sub-Total Applications</i> | <i>275,000</i> | | <i>137,500</i> | | <i>\$3,713,875.00</i> |
| FWS 3-2359 Big Game Harvest Report | 85,000 | 15 minutes | 21,250 | \$27.01 | \$573,962.50 |
| FWS 3-2360 Fishing Report | 400,000 | 15 minutes | 100,000 | \$27.01 | \$2,701,000.00 |
| FWS 3-2361 Migratory Bird Hunt Report | 30,000 | 15 minutes | 7,500 | \$27.01 | \$202,575.00 |
| FWS 3-2362 Upland/Small Game/Furbearer Report | 25,000 | 15 minutes | 6,250 | \$27.01 | \$168,812.50 |
| <i>Sub-Total Activity Reports</i> | <i>540,000</i> | | <i>135,000</i> | | <i>\$3,646,350.00</i> |
| Totals: | 815,000 | | 272,500 | | \$7,360,225.00 |

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

We estimate the nonhour burden cost to respondents to be \$60,000. We charge fees for hunting applications at approximately 20 of the 389 refuges that are open for hunting or fishing. Fees range from \$1.00 to \$10.00 per application. Each year, approximately 10,000 individuals pay an average hunting application fee of \$6.00.

14. Provide estimates of annualized costs to the Federal Government.

We estimate the total annual cost to the Federal Government to administer this information collection to be \$18,431,500 (\$17,616,500 for salary/benefits and \$815,000 for overhead (printing, copying, postage, etc.)). See tables below for salary/benefit information. We used the Office of Personnel Management's Salary Table 2008-GS to determine the hourly wages. We multiplied the hourly wages by 1.5 to account for benefits (Bureau of Labor Standards news release USDL 07-1883, December 11, 2007).

Applications: For each application, we will receive forms; process information; determine

permittees by lottery, drawing, or other method; and advise applicants of their success. We will spend about 1 hour per application, or a total of 275,000 hours.

| Position | Grade | Hourly pay rate (est) | Hourly rate including benefits | Percent of time spent on collection | Weighted average (\$/hr) |
|--|--------------|------------------------------|---------------------------------------|--|---------------------------------|
| Clerical, unskilled (i.e. receptionist, office asst.) | GS 7 step 5 | \$17.67 | \$26.51 | 60% | \$15.91 |
| Professional and technical staff (biologist, outdoor recreation planner) | GS-11 step 5 | \$26.15 | \$39.23 | 30% | \$11.77 |
| Management (Refuge Manager) | GS 13 step 5 | \$37.27 | \$55.91 | 10% | \$5.60 |
| Weighted Avg (\$/hr) | | | | | \$33.28 |

Estimated salary/benefits cost to Federal Government to process applications is \$9,152,000 (\$33.28 weighted average \$/hr x 275,000 hours).

Activity Reports. We will consolidate and process the information and evaluate management implications. Processing time for activity reports is approximately 30 minutes each or a total of 270,000 hours.

| Position | Grade | Hourly pay rate (est) | Hourly rate including benefits | Percent of time spent on collection | Weighted average (\$/hr) |
|--|--------------|------------------------------|---------------------------------------|--|---------------------------------|
| Clerical, unskilled (i.e. receptionist, office asst.) | GS 7 step 5 | \$17.67 | \$26.51 | 75% | \$19.88 |
| Professional and technical staff (biologist, outdoor recreation planner) | GS-11 step 5 | \$26.15 | \$39.23 | 15% | \$5.88 |
| Management (Refuge Manager) | GS 13 step 5 | \$37.27 | \$55.91 | 10% | \$5.59 |
| Weighted Average (\$/hr) | | | | | \$31.35 |

Estimated salary/benefits cost to Federal Government to process activity reports is \$8,464,500 (\$31.35 weighted average \$/hr x 270,000 hours).

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

This is a new collection. During a review of our general refuge regulations in 50 CFR, we discovered that some refuges were collecting information on hunt applications or activity reports, which had not been approved by the Office of Management and Budget.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

We do not plan to publish this information.

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.

We will display the OMB approval number and expiration date on the application.

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.