

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

OMB Control Number 1018-0010

**Mourning Dove Call Count Survey
FWS Form 3-159**

Terms of Clearance: None.

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

The Migratory Bird Treaty Act of July 3, 1918 (40 stat. 755; 16 U.S.C. 703-711), as amended, directs the Secretary of the Interior to determine the extent to which migratory game birds may be hunted. The Secretary has delegated this authority to the Fish and Wildlife Service (Division of Migratory Bird Management/DMBM). For most species of game birds, including the mourning dove, we base this determination primarily on biological information gathered through surveys. For mourning doves, we collect the essential information by means of the call count survey.

2. Indicate how, by whom, how frequently, and for what purpose the information is to be used.

The call count survey is a cooperative effort between State wildlife agencies and the Fish and Wildlife Service. State, tribal, local, and Federal biologists conduct the survey each spring using FWS Form 3-159 (Mourning Dove Call-Count Survey) to report survey data to DMBM. Instructions for completing the survey and reporting data are on the reverse of the form.

General information, such as survey year, route number and location, region, county, and sunrise time are printed on the forms before they are distributed to observers. Observers provide information on:

- Weather conditions, vehicle mileage, etc.
- Time at each stop.
- Number of birds heard calling at each stop.
- Number of birds seen while stopped and while driving.
- Disturbance level.
- Remarks concerning the survey.

We collect observer information (name, telephone, email address, and mailing address) so that we can contact the observer if questions or concerns arise.

We use the information that we collect to analyze the survey data and prepare reports. Assessment of the population's status serves to guide both the Service and the States in the annual promulgation of regulations for hunting mourning doves. We also use survey data to plan and evaluate dove management programs and provide specific information for dove research.

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 reporting procedure requires that the respondent use pen or pencil to fill out FWS Form 3-159. The respondent can voluntarily submit data electronically to further assist DMBM personnel with keypunching. FWS Form 3-159 is available to cooperators at a password protected website. Results from the survey collection are available to the public over the Internet at:

- <http://mbdcapps.fws.gov> in a summarized, tabular format; and
- <http://www.fws.gov/migratorybirds/reports/reports.html> in a report format.

4. Describe efforts to identify duplication.

The information that we obtain through the survey is not available from another source either within or outside of the Fish and Wildlife Service. State and Service personnel review the survey results at annual technical committee meetings.

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

This survey does not impact 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.

Mourning dove populations are dynamic and change in size and status from year to year. For this reason, we publish hunting regulations annually. Annual assessments of the population status of the more important species, including mourning doves, are desirable. Without information on the population's status, we might promulgate hunting regulations that are:

- Not sufficiently restrictive, which could cause harm to the dove population, or
- Too restrictive, which would unduly restrict recreational opportunities afforded by dove hunting.

Another consequence of not conducting the surveys is that we could be vulnerable to litigation charging mismanagement and failure to fulfill treaty and other obligations.

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 conduct this collection 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 July 24, 2008, we published in the Federal Register (73 FR 43254) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending September 22, 2008. We received one comment during that period. The commenter expressed opposition to hunting and the Government, but did not address the collection requirements. We have not made any changes to the information collection as a result of this comment.

We meet annually with representatives from States within each unit to discuss survey procedures and results. A list of State representatives is below. Individual cooperators also have the opportunity to express concerns directly by including notes or letters with FWS Form 3-159 or by contacting DMBM directly through phone or email.

David Scott Ohio Department of Natural Resources 614-265-6338. dave.scott@dnr.state.oh.us	Don Kraege Washington Dept. of Fish and Wildlife 360-902-2522 kraegdkk@dfw.wa.gov
Mike Olinde Louisiana Dept. of Wildlife & Fisheries 225-765-2355 molinde@wlf.louisiana.gov	Helen Hands Cheyenne Bottoms Wildlife Area 620-793-3066 helenh@wp.state.ks.us

Jim Hansen Montana Fish, Wildlife and Parks	Mike O'Meilias Oklahoma Dept. of Wildlife Conservation
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406-247-2957 jihansen@mt.gov	405-424-0096 momeilia@zoo.odwc.state.ok.us
Mike Rabe AZ Game & Fish Department mrabe@azgfd.gov	Billy Dukes SC Dept. of Natural Resources 803-734-3939 dukesb@dnr.sc.gov

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 do not provide any assurance of confidentiality to respondents. Our compliance with the Privacy Act ensures confidentiality of personally identifying information. We have published a system of records in the Federal Register (46 FR 18378).

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 any sensitive questions.

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

We estimate there will be 3,314 annual burden hours associated with this information collection. Approximately 912 non-Federal cooperators conduct the survey and submit forms annually. For each response, we estimate it will take cooperators an average of 3.5 hours to supply the needed information. This includes time for:

- Reviewing instructions (15 minutes)
- Gathering data during survey stops (2 hours)
- Completing and reviewing the survey form (15 minutes)
- Driving time to and from the survey site (1 hour). Because of the variation among individuals and route locations, it is difficult to provide an accurate estimate of driving time. Driving time varies substantially from 5 minutes to 2 hours. Some individuals conduct the survey on their way to or from work, or some conduct the survey as a normal part of their job. Others may conduct the route separately.

Approximately 730 cooperators (80 percent) will voluntarily choose to submit data electronically. This adds an additional 10 minutes to the response time, or a total of 3 hours, 40 minutes per response).

Activity	Number of Respondents	Number of annual responses	Average time required per response	Total annual burden hours
Survey (electronic submittal)	730	730	3 hrs, 40 min	2,677
Survey	182	182	3 hrs, 30 min	637
Totals	912	912		3,314

We estimate the annual dollar value of the burden hours to be \$119,867.38 (3,314 hours X \$36.17). We used the May 2007 National Industry-Specific Occupational Employment and Wage Estimates NAICS 999200 - State Government from the Bureau of Labor Standards website (http://www.bls.gov/oes/current/naics4_999200.htm#b19-0000) to determine the dollar value of the burden hours [\$24.11 (mean hourly wage for a zoologist/wildlife biologist) multiplied by 1.5 to account for benefits equals \$36.17 per hour]. We calculated the benefits in accordance with BLS news release USDL 07-1883, December 11, 2007.

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

There is no nonhour cost burden to respondents.

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

We estimate that the total cost to the Federal Government to administer this information collection is \$49,720 (rounded).

Salary Costs

Federal Staff	Hourly Salary	Salary (including Benefits)*	Total Hours	Total Salary Cost
GS-7/step 7	\$22.61	\$33.92	300	\$10,176.00
GS-11/step 1	\$27.89	\$41.84	645	26,986.80
GS-12/step 2	\$34.54	\$51.81	225	\$11,657.25
Total				\$48,820.05

*For salary costs, we used the Office of Personnel Management Salary Table 2008-DCB to determine the hourly wage and multiplied by 1.5 to account for benefits. Benefits were calculated in accordance with BLS news release USDL 07-1883, December 11, 2007.

Nonsalary Costs

Activity	Cost
Materials and forms	\$ 500
Postage	400
TOTAL	\$ 900

15. Explain the reasons for any program changes or adjustments.

We are estimating 912 responses and 3,314 burden hours for this information collection. This is an adjustment decrease of 150 in the number of responses and an increase of 517 in the number of burden hours. In our previous request, we erroneously included 150 Federal cooperators as respondents and did not include driving hours to and from the survey site when calculating the burden.

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

For analytical techniques, see METHODS in the report on Mourning Dove, White-winged Dove, and Band-tailed Pigeon Population Status, 2008 (attached as supplementary document).

Form 3-159 sent to cooperators	Early spring
Survey	May 20-31
Collection of forms & data entry	late May, early June
Data analysis	Early June
Report Writing	Early June
Publication date	mid June
Service Regulations Committee Meeting (recommendations on hunting season)	late June

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 control number and 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.