

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

OMB Control Number 1018-0019

**American Woodcock Singing Ground Survey
FWS Form 3-156**

Terms of Clearance: None.

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

The Migratory Bird Treaty Act (16 U.S.C. 703-711) requires the Secretary of the Interior (Fish and Wildlife Service) to implement a viable and ongoing program for the protection and conservation of various migratory birds. The North American Woodcock Singing Ground Survey is an essential part of the migratory bird management program and provides the data necessary to determine the population status of the woodcock. In addition, the information is vital in assessing the relative changes in the geographic distribution of the woodcock.

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.

The Division of Migratory Bird Management (DMBM), Fish and Wildlife Service, uses the information to assess the status of woodcock populations and to develop recommendations for hunting regulations. The Service, State and Provincial conservation agencies, university associates, and other interested parties also use the information for various research and management projects. The Canadian Wildlife Service, Provinces, and States rely on the Fish and Wildlife Service to administer and coordinate this survey.

State, local, tribal, Provincial, and Federal conservation agencies use FWS Form 3-156 to conduct annual field surveys. Instructions for completing the survey and reporting data are on the reverse of the form. Observers mail/fax FWS Form 3-156 to the DMBM or enter the information electronically through the Internet.

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

Observers provide information on:

- Sky condition, temperature, wind, and precipitation.
- Stop number.
- Odometer reading.
- Time at each stop.
- Number of birds heard peenting.
- Disturbance level.
- Comments concerning the survey.

We use the information that we collect to analyze the survey data and prepare reports. Assessment of the population's status serves to guide the Service, the States, and the Canadian Government in the annual promulgation of hunting regulations.

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 the respondent to use pen or pencil to fill out FWS Form 3-156. The respondent can voluntarily submit data electronically to further assist FWS-DMBM personnel with keypunching. FWS Form 3-156 is available for download 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.

We are not aware of any duplication. Within the Federal Government, DMBM is the sole organizational unit charged with monitoring the population status of migratory game birds. Also, the realm of migratory bird management is small. If similar sources of information were available or even possible, DMBM would be aware of them.

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

The 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.

Migratory game bird populations are dynamic and can change in size and status from year to year. For this reason, the promulgation of hunting regulations has traditionally been an annual activity, and, thus, annual assessments of the population status of the more important species, including woodcock, 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 woodcock population, or
- Too restrictive, which would unduly restrict recreational opportunities afforded by woodcock 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 with representatives from States and Provinces within each region annually to discuss survey procedures and results (see table below). Individual cooperators also have the opportunity to express concerns directly by including notes or letters with FWS Form 3-156 or contacting DMBM directly through phone or email.

Dan McAuley USGS Patuxent Research Station 207-581-3357 dmcauley@usgs.gov	Tom Engel Minnesota Dept. of Natural Resources 218-999-7936 tom.engel@dnr.state.mn.us
Lori Wolff FWS Private Lands Office 320-253-4682 lori_wolff@fws.gov	Mike Olinde Louisiana Dept. of Wildlife and Fisheries 225-765-2355 molinde@wlf.louisiana.gov
Al Stewart Michigan Dept. of Natural Resources 517-373-1263 Stewart1@michigan.gov	Nathan Stricker Ohio Dept. of Natural Resources 740-747-2525 x22 Nathan.stricker@dnr.state.oh.us
Mike Murphy New York Division of Fish, Wildlife, and Marine Resources 607-273-3763 mjmurphy@gw.dec.state.ny.us	

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 sensitive questions.

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

We estimate there will be 1,206 annual burden hours associated with this information collection. Approximately 680 non-Federal cooperators conduct the survey and submit forms annually. For each response, we estimate it will take cooperators an average of 1.67 hours to supply the needed information. This includes time for:

- Reviewing instructions and map (5 minutes)
- Gathering data during survey stops (30 minutes)
- Completing and reviewing the survey form (5 minutes)
- Driving time to and from the survey site (1 hour)

Approximately 544 cooperators (80 percent) will voluntarily choose to submit data electronically, which adds an additional 8 minutes to the response time, or a total of 1.8 hours per response.

Activity	Number of Respondents	Number of annual responses	Average time required per response	Total annual burden hours
Survey (electronic submittal)	544	544	1.8 hours	979
Survey	136	136	1.67 hours	227
Totals	680	680		1,206

We estimate the annual dollar value of the burden hours to be \$43,002 (rounded).

Respondents	Annual Burden Hours	Hourly Wage	Hourly Wage Including Benefits	Dollar Value of Burden Hours
United States	901	\$24.11	\$36.17	\$32,589.17
Canadian	305	\$22.76	\$34.14	10,412.70
Totals	1,206			\$43,001.87

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 U.S. burden hours [\$24.11 (mean hourly wage for a zoologist/wildlife biologist) multiplied by 1.5 to account for benefits equal to \$36.17 per hour].

We used the Labour Market Information Service, Canada – Wages & Salaries website (http://www.labourmarketinformation.ca/standard.asp?ppid=43&lcode=E&prov=&gaid=&occ=&search_key=1&pre_sel_criteria=0) to determine wage information for Canadian cooperators. We obtained 2006-2008 wage information for biologists in each Province (Ontario, Nova Scotia, New Brunswick, Quebec, and Manitoba) participating in the survey, averaged the wages for each area within the Province, and then averaged all the Provinces together. We estimate the average dollar value of a Canadian burden hour to be \$18.59 CAD. Using the exchange rate in effect on November 25, 2008, we estimate the dollar value of a Canadian burden hour to be \$22.76 USD, which we multiplied by 1.5 to account for benefits (\$34.14 USD).

We calculated the benefits for both U.S. and Canadian cooperators 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 are no nonhour burden costs 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 \$44,076 (rounded).

Salary Costs

Federal Staff	Hourly Salary	Salary (including Benefits)*	Total Hours	Total Salary Cost
GS-7/step 7	\$22.61	\$33.92	180	\$ 6,105.60

GS-11/step 1	\$27.89	\$41.84	595	24,894.80
GS-12/step 2	\$34.54	\$51.81	235	\$12,175.35
Total				\$43,175.75

*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 680 responses and 1,206 burden hours for this information collection. This is an adjustment decrease of 70 in the number of responses and an increase of 635 in the number of burden hours. In our previous request, we erroneously included 70 Federal cooperators as respondents and did not include driving time (1 hour per response) to and from the survey site when calculating the burden. In addition, the percentage of cooperators using electronic submission has increased 10 percent during the last 3 years. The increase in electronic submission slightly increases the response time.

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

Analytical techniques are in the annual American Woodcock Population Status Report under METHODS. This status report is distributed both internally and externally.

Form 3-156 sent to cooperators	Early spring
Survey	April - May
Collection of forms	April - May
Data analysis	May
Report writing	May-June
Publication date	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.