

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

OMB Control Number 1018-0102

**National Wildlife Refuge
Special Use Permit Applications and Reports**

50 CFR 25, 26, 27, 29, 30, 31, 32, and 36

Terms of Clearance: None.

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

The administration and uses of national wildlife refuges and wetland management districts are governed by the:

- National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee) (Administration Act), as amended by the National Wildlife Refuge System Improvement Act of 1997.
- Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act).
- Alaska National Interest Lands Conservation Act (16 USC 3101 et seq.) (ANILCA).

The Administration Act consolidated all of the different refuge areas into a single National Wildlife Refuge System (System). It also authorizes us to permit public accommodations, including commercial visitor services, on lands of the 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 it is not inconsistent or does not interfere with the primary purpose(s) of the refuge.

ANILCA provides specific authorization and guidance for the administration and management of national wildlife refuges within the State of Alaska. Its provisions provide for the issuance of permits by the System under certain circumstances. These provisions are implemented through 50 CFR sections identified below.

In our general refuge regulations, we provide for public entry for specialized purposes, including economic activities such as the operation of guiding and other visitor services on refuges by concessionaire or cooperators under appropriate contracts or legal agreements or special use permits (50 CFR 25.41, 25.61, 26.36, 27.71, 27.91, 27.97, 29.1, 29.2, 30.11, 31.2, 31.13, 31.14, 31.16, 32.2(1), 36.31, 36.32, 36.33, 36.37, 36.39, 36.41 and 43 CFR 5). These regulations provide the authorities and procedures for allowing permits on national wildlife refuges and wetland management districts including those in 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.

We issue special use permits for a specific period as determined by the type and location of the

use or visitor service provided. These permits authorize activities such as:

- Agricultural activities (haying and grazing, 50 CFR 29.1, 29.2 and 29.3);
- Beneficial management tools that we use to provide the best habitat possible on some refuges (50 CFR 30.11, 31.14, 31.16, and 36.41);
- Special events, group visits and other one-time events (50 CFR 25.41, 26.36, 25.61, and 36.41);
- Recreational visitor service operations (50 CFR 25.41, 25.61 and 36.41);
- Guiding for fishing, hunting, wildlife education, and interpretation (50 CFR 25.41 and 36.41);
- Commercial filming (50 CFR 27.71) and other commercial activities (50 CFR 29.1 and 36.41);
- Building and using cabins to support subsistence or commercial activities (in Alaska) (50 CFR 26.35, and 36.41);
- Research, inventory and monitoring, and other noncommercial activities (50 CFR 26.36 and 36.41).

The likely respondents to this information collection are individual citizens, businesses, nonprofit organizations, educational institutions, and Federal, State, local, or tribal governments.

Previously, we used FWS Form 3-1383 (Special Use Application and Permit) for all activities. However, experience has indicated that some types of activities, such as commercial use or research, require that we collect detailed information on the specific activity so that we can effectively manage the numerous uses of System lands. During the renewal process for this information collection, we realized that many refuges were collecting information not approved under the current collection. We are proposing three forms to correct this situation:

- FWS Form 3-1383-G (General Special Use Application and Permit).
- FWS Form 3-1383-C (Commercial Activities Special Use Application and Permit).
- FWS Form 3-1383-R (Research and Monitoring Special Use Application and Permit).

The forms will serve as both the application and permit. They will not change the permitting process or what activities require a permit. They have been developed to ensure that:

- Applicants are aware of the types of information that may be needed for permit issuance and that the collection of this information is approved in accordance with the Paperwork Reduction Act of 1995.
- Requested activities are compatible and appropriate with the purpose(s) for which the refuge was established.
- Applicant is eligible or is the most qualified applicant to receive the special use permit.

We collect the necessary information in form and nonform format (through discussions in person or over the phone, over the Internet, by e-mail, or by letter). In some instances, respondents will be able to provide information verbally. Often, a simple e-mail or letter describing the activity will suffice. For activities (e.g., commercial visitor services, research, etc.) that might have a large impact on refuge resources, we may require applicants to provide more detail on operations, techniques, and locations. Because of the span of activities covered by special use permits and the different management needs and resources at each refuge, respondents may not be required to answer all questions. Depending on the requested activity, refuge managers will have the discretion to ask for less information than appears on the proposed forms. However, refuge managers cannot ask for more or different information. Many permittees provide services and facilities to the public. We issue permits for a specific

period as determined by the type and location of the use or service provided. We use these permits to ensure that the applicant is aware of (1) the requirements of the permit and (2) his/her legal rights. Refuge-specific special conditions may be required for the permit. We identify conditions as an addendum to the permit. Most of the special conditions pertain to how a permitted activity may be conducted and do not require the collection of information. However, some special conditions, such as activity reports, before and after site photographs, or data sharing, would qualify as an information collection, and we have included the associated burden in this information collection request.

For all forms we ask ...	So that we can ...
Whether application is for a new permit or for renewal or modification of an existing permit	Determine the level of information required to process the application.
Signature of applicant and date of application	Determine who provided the information and the date the application was signed.
Full name of applicant (and/or business), organization (and/or business), address, phone number, fax number, and e-mail address	Contact the applicant during the application process or after issuing a permit.
Description of the activity	Determine whether or not an activity is compatible with the purpose of the refuge, the impact on refuge resources, and if special conditions apply.
Names and addresses of assistants/subcontractors/subpermittees	Identify the people involved in the proposed activity.
Activity/site occupancy timeline	Reduce or eliminate scheduling conflicts, anticipate time frame of activity, and manage the long- and short-term impact of site usage.
Frequency of activity	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Specific location	Reduce or eliminate scheduling conflicts and manage the long- and short-term impact of site usage.
Map of location	Identify specific location of activity (primarily used for rural activity locations).
If other certifications are required	Determine if an applicant meets all requirements to conduct the activity.
If other Federal, State or tribal permits are required.	Determine if an applicant meets all requirements to conduct the activity.
Logistics and transportation details	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Vehicle descriptions and license plate numbers, including those from boats and planes	Confirm that specific vehicles are authorized to be in restricted areas.
Equipment used	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
If overnight stays are required	Determine whether or not an activity is compatible with the purpose of the refuge, assess the impact on refuge resources, reduce or eliminate scheduling conflicts, and manage the long- and short-term impact of site usage.
Description of onsite or living or working accommodations	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.

For FWS Form 3-1383-G and Form 3-1383-C we ask ...	So that we can ...
Activity type	Determine if an activity is appropriate to be considered for a special use permit.
Expected number of participants/clients	Assess the impact on refuge resources.
Operational plan	Understand the details of the activity so we can determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Insurance coverage	Determine that an applicant can protect himself/herself and the System from future legal and financial predicaments.

For FWS Form 3-1383-C and Form 3-1383-R we ask ...	So that we can ...
Detailed information on ship-to-shore, intersite, and onsite transportation logistics	Determine whether or not an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Safety plan	Determine if appropriate safety measures are in place.

For FWS Form 3-1383-C we ask ...	So that we can ...
Business tax number	Process payment of fees and charges in accordance with the Debt Collection Improvement Act.
Trip schedule	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Current or past history of violations of State, Federal, or local laws or regulations related to fish and wildlife.	Assess past compliance with fish and wildlife laws and regulations, and determine that the applicant is qualified to undertake the activity.

For FWS Form 3-1383-R we ask ...	So that we can ...
Sponsoring organization	Verify that the applicant is a bona fide researcher and determine if the applicant is qualified to undertake the activity.
Applicant's relationship to affiliation/organization (professor, staff, student, etc)	Verify that the applicant is a bona fide researcher and determine if applicant is qualified to undertake the activity.
Other cooperators/institutions	Determine whether the project is supported by other entities, verify that the applicant is a bona fide researcher, and determine if applicant is qualified to undertake the activity.
Applicant Curriculum Vitae or Resume	Determine if the applicant is qualified to undertake the activity.
Title and copy of research/monitoring proposal	Assess the scientific rigor of the proposal.

Hypothesis	Determine focus of the project and assess the scientific rigor of the proposal.
Species involved, samples to be taken, and data to be collected, including schedule	Assess the scientific rigor of the proposal, the impact on refuge resources, and determine whether or not an activity is compatible with the

	purpose of the refuge.
Details of offsite transportation of samples	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.
Expected benefits of research/monitoring project	Assess the scientific rigor of the proposal, and determine the long and short- term impacts on refuge resources.
Project history and relationships to other research/ monitoring projects	Determine the temporal scale of the project and whether the project is supported by other entities,
General timeline for analysis, write-up and publication	Determine how and when the results of the project will be shared with the scientific/conservation community.
Submission of an Animal Care form, or Institutional Animal Care and Use Committee approval (or equivalent)	Assess the scientific rigor of the proposal and ensure that any animals involved in the project are appropriately cared for.
Details on installation, maintenance and removal of instrumentation	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether or not an activity is compatible with the purpose of the refuge.

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].

FWS Forms 3-1383-G, 3-1383-C, and 3-1383-R will be available online in a fillable format. Because the application and permit are on the same form, applicants must print the form and submit it to the appropriate refuge for review and approval by a refuge official. In some instances, applicants may be able to submit the information in a nonform format. An estimated 20 percent of FWS Form 3-1383-G users will submit their applications in a nonform format or electronically (via email). Few users of FWS Forms 3-1383-C and 3-1383-R will use a nonform format or be able to submit the information electronically. When required, we will accept activity reports electronically via e-mail.

4. Describe efforts to identify duplication.

There is no duplication. The information is specific to the applicant, the use or activity proposed, and the refuge where the proposed activity will take place

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

This collection of information does not have a significant impact on a substantial number of small entities. Applicants submit the information for specific needs, and this information is not available from any other source. Small businesses from which we collect information are typically recreational visitor service operations (outfitters/guides), farming operations, commercial filming, and other commercial activities. We collect only the minimum information necessary to establish eligibility, protect resources, and demonstrate that applicants are aware of information they need to know to protect themselves from legal and financial predicaments. As a further means to reduce burden, we will use applicable portions from original applications to process renewals.

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, we would be unable to review the proposed uses and evaluate the impacts or effects of proposed uses on System lands. This would preclude our ability to fulfill statutory requirements and our responsibilities under the Administration Act, the Recreation Act, ANILCA and other relevant laws and regulations to determine if the proposed activity or use meets refuge compatibility standards.

We collect the information on either an as-needed basis (one-time or one-season event) or an annual basis. Some special uses, such as haying and grazing, are beneficial management tools that we use to provide the best habitat possible on some refuges and wetland management districts. We could not accomplish these management objectives without the cooperation and involvement of private individuals.

Special use permits provide us with a legal and binding document authorizing the particular use.

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.**

There are no circumstances 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 November 29, 2010, we published a notice in the *Federal Register* (75 FR 73119) announcing our intent to request renewal of this information collection. We solicited public comment for 60 days, ending on January 28, 2011. We received comments from three individuals.

Comment 1: The U.S. Fish and Wildlife Service may require sufficiently detailed information to ensure requested activities are consistent with the National Wildlife Refuge System Administration Act, and that specifically tailored permit applications can theoretically reduce the burden on the applicant and expedite the permitting process. However, the extensive list of information associated with the Research Special Use Application and Permit is significantly greater than the requirements represented in the current FWS Form 3-1383. Conversely, there are no information requirements listed for the Commercial Special Use Application and Permit, making it unclear as to why the Service determined a separate form is necessary. Considering the importance of research and the significant role that commercial guiding, visitor services and cabins serve in the public's ability to access and experience Alaska's remote refuges, there is a need to ensure that information requests are appropriate and do not create an undue burden to applicants. The Service should disclose information requirements for both new forms, along with supporting rationale and an explanation as to why the current form will not suffice. Draft forms and accompanying instructions should be made available for public review.

Response: The list of information collection requirements published in the 60-day notice (75 FR 73119) pertains to all three proposed forms, not just the proposed Research and Monitoring Special Use Application and Permit.

Prior to November 2009, Alaska refuges used FWS Form 3-2001 (approved under OMB Control No. 1018-0014) as the special use application. OMB Control No. 1018-0014 was discontinued in November 2009, and the Alaska refuges began using FWS Form 3-1383 (approved under OMB Control No. 1018-0102), which is the special use application used by refuges in the contiguous United States. During the renewal process, we discovered that the current FWS Form 3-1383 is inadequate for the many types of permitted activities, which has resulted in several situations where unauthorized information collections have taken place, both in Alaska and the rest of the States.

We have made every effort to carefully craft the new forms so that they are targeted to specific uses and only collect information that is necessary to manage and protect refuge resources. We designed the forms for use by all refuges in the National Wildlife Refuge System. The proposed forms ask for information that refuges need to manage the full span of uses that the public may need. The forms also allow refuge manager discretion as to what specific information is required. We can ask for less information than requested on the forms, but cannot ask for more or different information. This discretion will lessen the burden on applicants.

The proposed forms encourage applicants to contact the appropriate refuge to determine exactly what information is required.

We sent draft forms to the two commenters from Alaska and made extensive changes to the forms based on their input. In addition, the 30-day *Federal Register* notice will provide the public an additional opportunity to review and comment on the forms.

Comment 2: Regarding research conducted by the State fish and wildlife agencies, including the Alaska Department of Fish and Game, the Service should acknowledge that State fish and wildlife and other administrative actions are exempt from this information collection process. The States, including Alaska under ANILCA 1314 and 43 CFR part 24, need not apply for special use permits from the Service when conducting routine activities covered under a valid cooperative agreement.

Response: We agree with this comment. This information collection request does not change when a special use permit is required; it only pertains to what information we can collect when a permit is necessary.

Comment 3: In designated Wilderness Areas, a minimum requirement analysis may be necessary for activities generally prohibited under the Wilderness Act; however, this process is distinct from a special use permit.

Response: We agree with this comment. We will conduct the minimum requirement analysis as part of our permit review process.

Comment 4: The Citizens' Advisory Commission on Federal Areas believes strongly that permits for the use of public lands and resources should be required only when and where absolutely necessary. The Commission recognizes that permits are appropriate for certain activities and can be an important management tool, and supports any action that reduces the amount of paperwork necessary to secure those permits.

Response: We agree and issue the permits only when required by statute or regulation.

Comment 5: Although the current proposal would increase the number of forms from one to three, it appears that, depending on the activity being permitted, information requirements can be focused more narrowly than is possible with the existing application form. One problem with the Alaska form was that applicants were required to provide information that was unnecessary or irrelevant to the activity being permitted. Requiring an applicant to submit only pertinent information eases the burden on the public. While there may have been problems with the Alaska application form, we are concerned that replacing that form with the more generalized versions could result in similar unnecessary information requests and additional burdens to the public unless those forms are carefully crafted.

Response: Please see our response to Comment 1.

Comment 6: ANILCA provides specific authorization and guidance for the management of refuges in Alaska. The statutory provisions in ANILCA are implemented, in part, by the regulations at 50 CFR 36.41. The information requests included in any revised application form for a special use permit on an Alaskan refuge must incorporate the guidance found in these regulations. The need for any additional information or reporting requirements must be fully supported.

Response: The information collected on the proposed forms is consistent with the regulations implementing ANILCA.

Comment 7: The regulations at 50 CFR 36.41(d)(2) allow an applicant for a noncompetitively issued permit to present an application verbally. The application process must continue to accommodate verbal applications as provided for in the regulations.

Response: We agree and have added instructions on the form that an application may be made verbally. The new forms will not change the application process or regulatory requirements. We are proposing these forms to ensure that the information we collect is approved in accordance with the Paperwork Reduction Act of 1995.

Comment 8: Other Alaska specific regulations at 50 CFR 36.31, 36.32, 36.33, 36.37, and 36.39 provide some of the authorities and procedures for allowing permits on refuges. Any information requests associated with the new forms must be limited to that necessary to meet the requirements in these regulations for refuges in Alaska.

Response: We agree and will collect only the minimum information necessary to issue the requested permit in accordance with applicable regulations.

Comment 9: It is difficult to fully assess the full benefits from this proposal without being able to review the actual application forms and associated questions. Information in the *Federal Register* (75 FR 73119) provides only a partial list of the types of information to be collected, and only a few specific examples of which application form will be used to permit a particular activity. For example, the Commercial Special Use Application and Permit is proposed to be used for permitting recreational visitor service operations and building and using cabins to support subsistence or commercial activities in Alaska. The information that an applicant should be reasonably expected to provide to construct or use a cabin for subsistence activities would be significantly different than that necessary to construct a cabin to support a commercial activity.

Response: We sent draft forms to the two commenters from Alaska and made extensive changes to the forms based on their input. We have developed form-specific instructions that provide discretion for refuge managers on what specific information will be required for each use.

Comment 10: How will an applicant be advised of what information is required for their application? Is this left to the individual refuge manager or will there be national or regional guidance provided? Will instructions for completing the application be provided to the applicant? There have been situations in Alaska where applicants seeking permits for the same activity in more than one refuge are required to provide different types of information to each refuge. While refuge managers may have different management needs and requirements, lack of uniformity can increase the information collection burden on applicants. Clear guidance should be provided to Regional Offices and individual refuge managers to avoid confusion and prevent arbitrary and unnecessary information collection.

Response: We urge applicants, both on our websites and on the proposed forms, to contact the appropriate refuge to determine what information they need to submit for their desired permit. There are instructions and explanations on each form, but the forms are designed to cover many activities on all of our refuges. Depending on the activity requested and the differing management needs of refuges, there may be instances where an applicant has to submit more or less information for the same activity. These instances should be minimal, and, in no case,

can a refuge manager ask for information that is not on the application. Rather than following a “one form fits all approach,” we believe that allowing refuge managers the discretion to determine the level of information necessary to issue the permit will (1) ensure that refuge resources are protected, and (2) reduce the burden for applicants. If OMB approves the three proposed forms, we will issue guidance to Regional Offices and refuge managers that: (1) they must collect only the minimum information necessary to determine whether or not to issue a permit, and (2) they cannot collect any information that is not on the approved forms.

Comment 11: Grazing is never beneficial to wildlife, and no agricultural activity should be allowed on national wildlife refuges. Guides should not be allowed on national wildlife refuges. Taking people out to kill wildlife should not happen.

Response: The Administration Act authorizes us to permit public accommodations, including commercial visitor services, on lands of the System when we find that the activity is compatible and appropriate with the purpose for which the refuge was established. While we appreciate the views of the respondent, the comment did not address the information collection requirements. We did not make any changes to our information collection, based on this comment.

In addition to the *Federal Register* notice, we contacted the following individuals to obtain their views on: (1) whether or not the collection is necessary; (2) the accuracy of our burden estimates; (3) the clarity of instructions; and (4) ways to minimize the burden. All respondents indicated that the information we collect is necessary and appropriate, the burden estimate is accurate, and the burden is not excessive.

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The pertinent comments and the response or disposition are summarized in the table below. Based on these comments, we made extensive revisions to the three proposed forms.

Comment	Response/Disposition
List of assistants/subcontractors/sub-permittees is too detailed. Participants (volunteers) may vary daily and it is impossible to tell when or if someone will be involved.	Clarified in permit instructions that the applicant only needs to list those people who (1) will operate independently from permittee or (2) will be present on the refuge when the permittee is not.
Unclear what is meant by “Full proposal is required”?	Clarified requirement in permit instructions.
Does "assurance of animal care" form refer to Institutional Animal Care and Use Committee?	Added "Institutional Animal Care and Use Committee" or equivalent on form and included in the permit instructions.
Recommend that “timeline for analysis, write-up, and publication” be deleted.	Modified to read, "Anticipated or general timeline for analysis, write-up, and publication," and clarified that actual publication journal need not be identified in the instructions.
Requirement for insurance coverage is unclear.	Clarified requirement in permit instructions.

Inclusion of vehicle description and license number would be difficult or impossible for	Clarified in permit instructions applicant only needs to list those vehicles that will (1) operate independently
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many people to fill out in advance because of the number of volunteers that may be involved in project.	from permittee or (2) be present on the refuge when the permittee is not.
Y/N format will require applicants to read a significant amount of supporting guidance material just to determine whether a requirement applies to an activity, which could be overly-burdensome.	Revised "Notice" to include detailed instructions and deleted references to guidance documents.
It may be simpler to indicate the types of activities the question applies to on the form.	Provided additional clarity in permit instructions.
It appears there will be two types of guidance available to applicants – one that generally applies to the refuge system as a whole and others that apply to individual refuges.	Revised "Notice" to include detailed instructions and deleted references to guidance documents.
Given the number of unique ANILCA provisions that apply to all Alaska refuges, the Service should consider including Alaska-specific guidance either embedded within the general guidance or as a separate document, similar to the "Alaska Supplement to the Minimum Requirements Decision Guide," which is referenced below.	Revised "Notice" to include detailed instructions and deleted references to guidance documents. Specific references to Alaska refuges are included in instructions.
It may be more efficient to develop separate Alaska-specific applications that address Alaska specific requirements/allowances in the form itself, similar to FWS 3-2001, which was discontinued in 2009.	We believe one set of forms, with refuge manager discretion on the information that the applicant must submit, is the most desirable and efficient.
Recommend the new applications be more specific on where referenced guidance can be easily located.	We have revised the "Notice" portion of the form to include detailed instructions and have deleted references to "guidance documents."
Recommend the Minimum Requirements Decision Assessment (MRDA) for activities conducted in wilderness be conducted by the Service instead of the applicant, as this question implies.	Deleted this requirement. We will conduct this analysis.
Edit question "Minimum Requirements Decision Assessment for activities conducted in <i>designated</i> Wilderness Areas required _____ Yes _____ No ___ N/A (See refuge guidance)"	Deleted this requirement. We will conduct this analysis.
Typically, an applicant signs at the bottom of an application.	The applicant signs at the bottom of the application and also on the permit form to acknowledge receipt of the permit conditions.
"Special project conditions" is similar to "permit stipulations," which would be determined by the refuge after reviewing an application rather than submitted with an application.	Added a note that reads: "Special conditions/permit stipulations may be added to permit prior to approval." and deleted this question.
Change question: "Briefly describe project's relationship to other research/monitoring projects <i>either known of or conducted by the applicant.</i> "	Edited the question as suggested.

Question the need for "refuge guidance"	Provided additional clarity in permit instructions.
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associated with (1) whether or not a map is required and (2) Grounding/Flight Insurance.	
Requiring applicants to disclose and provide copies of all permits required for a project seems excessive. Not all permits will be available when the application is submitted to the FWS. At a minimum, recommend clarifying that the FWS application can be processed pending receipt of other required permits. However, unless the Service expects to verify that all permit requirements have been met, recommend requiring the applicant to simply acknowledge that they are responsible for obtaining all required permits.	Revised "Notice" to include detailed instructions that clarifies that the permit may be processed while other permits are being acquired.
Clarify what equipment would be considered "special."	Deleted the term "special."
Delete request for information on "offsite" work or living accommodations.	Modified forms to delete this requirement.
Include an N/A option on the grade level of educational group question.	Forms modified as suggested.
Provide space for at least a few assistants/subcontractors/subpermittees on form rather than add an addendum	Forms modified as suggested.
Most guidance should be on the form rather than in some other document	Revised "Notice" to include detailed instructions and deleted references to "guidance documents."
The term "expected benefits" is ambiguous.	While this term may be broad, we believe that a general explanation of the outcome of the research is beneficial.
Provide more guidance for open-ended questions.	We revised the "Notice" to include detailed instructions.
The terms "State permits" and "Federal permits" are ambiguous.	We revised the "Notice" to include detailed instructions. Depending on the activity or species involved, additional State or Federal permits may be necessary.
Forms inconsistently identify questions that are context or refuge dependent.	We developed form-specific and question-specific instructions. However, the forms also provide discretion for refuge managers on what specific information will be required. The discretion provided is designed to lessen the burden on applicants.

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 make any assurances of confidentiality. We do not make the information available to the public and share the information only with agencies having a legal interest.

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 15,600 responses totaling 13,050 annual burden hours for information collection associated with special use permits on national wildlife refuges.

We estimate the total dollar value of the annual burden hours for this collection to be \$382,752 (rounded). We estimated average hourly wages and calculated benefits using the Bureau of Labor Statistics Bulletin USDL 11-0304 entitled "Employer Costs for Employee Compensation—December 2010" (<http://www.bls.gov/news.release/pdf/ecec.pdf>) released on March 9, 2010.

- Individuals/Households - We used the wage and salary rate for all workers from Table 1 (\$20.71) and multiplied by 1.4 to account for benefits, resulting in an hourly rate including benefits of \$28.99 (rounded).
- Private Sector - We used the wage and salary rate for all workers from Table 5 (\$19.64) and multiplied by 1.4 to account for benefits, resulting in an hourly rate including benefits of \$27.50 (rounded).
- State/Local/Tribal Government – We used the wage and salary rate for all workers from Table 3 (\$26.42) and multiplied by 1.5 resulting in an hourly rate including benefits of \$39.63.

REQUIREMENT	ANNUAL NO. OF RESPONDENTS	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE (HOURS)	TOTAL ANNUAL BURDEN HOURS	HOURLY LABOR COSTS INCLUDING BENEFITS	TOTAL DOLLAR VALUE OF ANNUAL BURDEN HOURS
Form 3-1383-G						
Individuals	13,300	13,300	0.5	6,650	\$28.99	\$192,783.50
Private Sector	100	100	0.5	50	\$27.50	1,375.00
Government	100	100	0.5	50	\$39.63	1,981.50
<i>Subtotal</i>	13,500	13,500		6,750		196,140.00
Form 3-1383-C						
Individuals	50	50	4.0	200	\$28.99	5,798.00
Private Sector	1,100	1,100	4.0	4,400	\$27.50	121,000.00
Government	50	50	4.0	200	\$39.63	7,926.00
<i>Subtotal</i>	1,200	1,200		4,800		134,724.00
Form 3-1383-R						
Individuals	50	50	4.0	200	\$28.99	5,798.00
Private Sector	50	50	4.0	200	\$27.50	5,500.00
Government	200	200	4.0	800	\$39.63	31,704.00
<i>Subtotal</i>	300	300		1,200		43,002.00
Activity Reports						

Individuals	40	40	0.5	20	\$28.99	579.80
Private Sector	460	460	0.5	230	\$27.50	6,325.00
Government	100	100	0.5	50	\$39.63	1,981.50
<i>Subtotal</i>	600	600		300		8,886.30
Totals	15,600	15,600		13,050		\$382,752.30

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information.

While an application fee of between \$50.00 and \$200 is submitted with most commercial use applications, we estimate the average fee per application is \$100. Therefore, we estimate that the annual nonhour cost burden associated with this information collection is \$120,000 (\$100.00 x 1,200 applications)

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

The estimated annual cost to the Federal Government to administer this information collection is **\$765,818.**

Salary/Benefits: \$750,818. We estimate that it will take an average of 1 hour to review and process each application and report, or a total of 15,600 hours. Applications and reports are reviewed at national wildlife refuges in all 50 States, some of which are in locality pay areas. To determine hourly wage rates, we used the Office of Personnel Management Salary Table 2011-DCB as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.5 in accordance with Bureau of Labor Statistics Bulletin USDL 11-0304 entitled “Employer Costs for Employee Compensation—December 2010” (<http://www.bls.gov/news.release/pdf/ecec.pdf>) released on March 9, 2010.

POSITION	GRADE	HOURLY PAY RATE*	HOURLY RATE INCLUDING BENEFITS	TOTAL HOURS	TOTAL COST (hourly rate/w benefits x total hours)
Clerical, unskilled	GS 7 step 5	\$22.92	\$34.38	4,700	\$ 161,586
Professional/technical staff	GS-11 step 5	\$33.92	\$50.88	9,300	473,184
Management (Refuge Mgr)	GS 13 step 5	\$48.35	\$72.53	1,600	116,048
Totals				15,600	\$750,818

Other Costs: \$15,000 (printing, copying, postage, and overhead (not including employee benefits)).

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

We are reporting 15,600 annual responses totaling 13,050 burden hours, which is an increase of 1,375 responses and a decrease of 1,175 burden hours from our previous submission. We are reporting this as a program change. While neither our permitting process nor our regulations have changed, we are proposing three new forms to replace the one form currently approved for use. Experience has indicated that some types of activities, such as commercial use or research, require that we collect detailed information on the specific activity so that we can effectively manage the numerous uses of System lands. By using three forms, we were able to reduce the completion time for the General Special Use Application (which is by far the most used application) from 1 hour to 1/2 hour.

Also, we are reporting as a program change \$120,000 in nonhour burden costs. These costs are for fees associated with commercial activity applications and were mistakenly omitted from our previous submission.

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

We will not publish this information. Information collected is strictly for use by refuge staff to determine eligibility for permits.

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.

18. Certification.

There are no exceptions to the certification statement.