

¹Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-NEW

National Mourning Dove Hunter Attitude Survey on Nontoxic Shot

Terms of Clearance. None – this is a new collection.

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

Under the Migratory Bird Treaty Act (16 U.S.C. 703-711), the Secretary of the Interior has the authority to regulate take of migratory birds in the United States. Under this authority, the U.S. Fish and Wildlife Service (we, Service) is the agency responsible: (1) for the wise management of migratory birds in the United States, and (2) to ensure hunting regulations (50 CFR part 20) are within guidelines that allow for the populations' well-being.

In recent years, wildlife managers and policy makers at all levels have become increasingly concerned about the exposure of mourning doves to spent lead shot. The mourning dove is the most-hunted migratory game bird species, thus knowledge of dove hunter attitudes and their potential acceptance of nontoxic shot regulations would be an important prerequisite to establishing any new regulations should be they necessary.

The Association of Fish and Wildlife Agencies (AFWA) and all four Flyway Councils are conducting a National Survey of Dove Hunter Attitudes on Nontoxic Shot and the Service is interested in contributing funds toward this joint, national effort. Information from this survey will help us make nontoxic shot policy decisions and develop appropriate informational and educational programs if new regulations are necessary. Furthermore, the wildlife management community wants to explicitly recognize mourning dove hunter concerns and uncertainties about nontoxic shot issues.

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 Migratory Bird Harvest Information Program (HIP) requires each State to annually provide a list of all migratory bird hunters in the State to the Service (50 CFR 20, OMB Control Number 1018-0023). Randomly selected mourning dove hunters will be drawn from these HIP lists and mailed a cover letter and questionnaire survey form (FWS Form 3-2386). Hunters will be provided a postage-paid envelope to return the survey form. Up to two additional followup mailings will be sent to individuals not responding to the initial mailing. State and Federal authorities will use hunters' responses to the questionnaire to measure dove hunter awareness of:

- Impacts on dove health related to the use of lead shot for mourning dove hunting.
- Impacts on other wildlife health related to the use of lead shot for mourning dove hunting.

- And attitudes toward possible future policy action regarding the use of lead shot.

The survey collaborators relied on an Information-theoretic approach and model ranking for determining variable importance and building the actual survey. That approach is outlined below:

- The survey collaborators first developed three *a priori* conceptual models developed around demographic and experiential factors based on hypotheses about factors affecting hunter awareness and attitudes about lead and nonlead shot regulations. (Tables 1-3, Attachment A).
- Collaborators developed a list of variables linked to the models. (Tables 1-3, Attachment A).
- Survey experts developed the survey questionnaire based on the models and variable lists. (Table 4, Attachment A). Every question in the survey relates back to specific variables in the models and no extraneous questions were allowed.

This will be a one-time data collection; however, information obtained will give the Service a great deal of insight into the background and knowledge of our hunting constituency. The information is also used by private conservation and hunting organizations that are concerned with the welfare of our migratory bird resource.

A final report will be made available on the Division of Migratory Bird Management's (DMBM) Web site (<http://www.fws.gov/migratorybirds/NewsPublicationsReports.html>.) At key points during the data analysis process, Flyway technical committees, Flyway Councils (State agencies), consultants, and the public (and in some instances international regulatory agencies) review and provide valuable input on data analyses and technical assessments. All assessments will adhere to Information Quality Guidelines and peer-review plans for technical assessments deemed influential will be posted on the DMBM webpage. The DMBM has a long-history of subjecting applicable portions of such technical assessments to formal peer-review through submission to scientific journals, or other means, in addition to the review and scrutiny received as part of the annual regulatory process.

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].

We anticipate 23,470 responses to FWS Form 3-2386 using the postage-paid, business-reply envelope included with the survey form. Survey collaborators had a lengthy discussion about making this an internet only survey, or allow selected hunters to respond to the survey online. There was much concern about low response rates and nonresponse bias regarding an internet only survey. Similarly, there was also concern that if you allowed hunters to respond online instead of mail, we might receive responses from people who were not randomly selected for the survey. This would invalidate (i.e., bias) our survey results and complicate our efforts to obtain the information we are seeking. Having dual response platforms (mail and internet) would also likely result in the need for greater sample sizes if hunter attitudes vary by response platform.

4. Describe efforts to identify duplication.

Many State wildlife agencies collect some human dimensions information from their hunting constituency. Similarly, previous human dimensions work on mourning dove hunter attitudes toward nontoxic shot was conducted in Illinois (2006), Missouri (2007), and Texas (2009). Unfortunately, results from these studies are not comparable to each other and existing information is not available on a scale large enough to make inferences on a National-level. In some cases, existing information was insufficiently detailed or imprecise, or has inherent weaknesses in sampling design resulting in serious biases.

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

This collection does not significantly impact small entities. This information is only collected from individual mourning dove hunters.

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.

If this information were not collected, the U.S. Fish and Wildlife Service's ability to understand the attitudes and beliefs of our hunting constituency would be greatly weakened. In the short-term, this might not have major consequences to the Service, however in the future, if additional nontoxic shot regulations are deemed necessary, information provided by this request would be vital to informing educational and informational programs necessary to inform our hunting constituency.

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 special circumstances that require the collection to be conducted 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 August 18, 2009, we published in the Federal Register (74 FR 41739) a notice soliciting public comment on this information collection for 60 days. The comment period ended on October 19, 2009. We received the following comments:

One comment protested the entire migratory bird hunting regulations process, surveys and monitoring programs, and the killing of all migratory birds. *Response:* Our long-term objectives continue to include providing opportunities to harvest portions of certain migratory game bird populations and limit harvest to levels compatible with each population's ability to maintain healthy, viable numbers. Our surveys are integral parts of the Service's monitoring programs that provide the information we need to ensure harvest levels are commensurate with current status of migratory game bird populations and long-term population goals.

Five comments were from individuals who stated that there was no biological basis or scientific evidence to warrant any type of nontoxic shot regulations on mourning doves. *Response:* This proposed information collection request does not presume anything one way or another about the quality or quantity of the scientific evidence for or against the use of lead shot for dove hunting. We simply express concern about the issue and recognize hunters are an important constituency. The whole purpose of this information collection is to better understand the hunting constituency.

One comment requested that we be objective in any future decision regarding the implementation of any nontoxic shot regulations. *Response:* We have a long history of making informed decisions based on the best available science to ensure protection of migratory birds for future generations. If any future decisions regarding the implementation of nontoxic shot regulations for migratory birds are deemed necessary, they will be objective, based on the best available science, and follow all guidelines under the National Environmental Protection Act.

Two comments requested that we consider banning the use of lead shot for mourning doves and other wildlife species. *Response:* Again, we do not presume anything one way or another about the quality or quantity of the scientific evidence for or against the use of lead shot for dove hunting. Furthermore, we are not assuming that future nontoxic regulations will be necessary or inevitable.

In addition to the Federal Register notice, we solicited comments from seven individuals listed below regarding the instructions and time it took them to complete FWS Form 3-2386. Each of them stated that the instructions they received with the survey were straightforward and easy to understand, and each agreed that 8.5 minutes is an accurate estimate of time to complete the survey.

Robert DiSefano 6700 West Stidham Rd Harrisburg, MO (573) 875-1661	Julie Fleming 12801 Hwy EE Rocheport, MO 65279 (573) 874-1968	Linda Truesdell 1254 CR – 2782 Clark, MO 65243 (573) 641-9000
Elizabeth Goebel 1619 Highridge Circle, Columbia, MO 65203	Michael J. Hoff 551 NC Hwy 343 S Camden, NC 27921 (252) 336-2793	Craig Scroggins 308 War Admiral Dr Columbia, MO 65202 (573) 474-3941
Andrea Hoover 9405 Carleigh Ct Owings, MD 20736 (410) 610-4667		

Additionally, meetings and workshops are held several times annually between Service and State personnel responsible for management of migratory birds, at which time problems and needs related to migratory birds are discussed and acted upon. The Service has representatives to each of the four flyways (groups of States) to coordinate migratory bird management with State biologists. This survey has been discussed several times at these meetings.

Through regular meetings between the Department of the Interior and Dove Management Units of the four Flyway Councils, organizations of wildlife conservation professionals from States making up the Flyway, data collection needs and procedures are fully discussed and agreed upon.

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

No payments or gifts will be provided 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. Each hunter contacted will be advised that the survey will be conducted in accordance with the Privacy Act of 1974 (5 USC 552a). Hunters will not be asked to write their names on the questionnaires, and will be assured that their names or identifications will not be associated with their questionnaires.

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.

There are no questions of a sensitive nature.

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

The national mourning dove hunter attitude survey on nontoxic shot is a one-time data collection and we estimate 23,470 responses and 3,325 annual burden hours contained in this request. We consulted and beta tested a version of this survey on nine individuals. Those individuals stated that it took them approximately 1 minute to read the instructions and they averaged 7.5 minutes to complete the questionnaire (FWS Form 3-2386) for a total of 8.5 minutes per response.

We estimate the total dollar value of the annual burden hours for this collection to be \$97,323 (rounded). We used BLS Bulletin USDL-11-0849 (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to estimate hourly wages and calculate benefits. Table 1 lists an hourly wage of \$20.91 for all workers. We multiplied the hourly rate by 1.4 to account for benefits, resulting in an hourly rate of \$29.27 (rounded).

Table 12-1 – Burden Hour Estimates

Collection type/form number	No. of Annual Respondents	No. of Annual Responses	Completion Time per Response	Total Annual Burden Hours	\$ Value of Annual Burden Hours (\$29.27/hr)
National dove hunter attitude survey on nontoxic shot (Form 3-2386)	23,470	23,470	8.5 min.	3,325	\$97,322.75

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

The survey is accompanied by a postage-paid return envelope. There is no nonhour cost burden to respondents. There is no fee for completing the survey or any other costs associated with responding to this survey.

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

We estimate the total one-time cost for the Federal Government to be \$138,192.40.

We will contribute \$130,000 toward this cooperative endeavor to support AFWA's contract with D.J. Case and Associates. D.J. Case and Associates are under contract to conduct the actual survey (printing, mailing, data analyses, and report writing).

In addition, the Federal Government will incur \$8,192.40 in staff time for this information collection. We will contribute a part-time technical liaison to coordinate with AFWA, the four Flyway Councils, and D.J. Case and Associates to assist in analyses and report/manuscript preparation. We estimate about 120 hours of GS-13/step 3 Wildlife Biologist's time will be devoted toward this effort. We used the Office of Personnel Management's Salary Table 2011-DCB to determine salary costs. The hourly wage for a GS-13/step 3 is \$45.51. We multiplied this rate by 1.5 to account for benefits, resulting in an hourly wage of \$68.27 (rounded). We used BLS Bulletin USDL-11-0849 (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate benefits.

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

This is a new collection.

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

Response data will be edited, compiled in a database, and analyzed using standard statistical techniques for continuous and categorical variables using an Information Theoretic Approach. The final report on will be prepared and be distributed both internally and externally and made available on the Division of Migratory Bird Management Web site.

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 on the survey forms.

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.