

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

**Federal Fish and Wildlife Permit Applications and Reports--
Migratory Birds and Eagles
50 CFR 10, 13, 21, and 22**

OMB Control Number 1018-0022

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

We collect information on application forms and in reports to determine if applicants for permits meet the requirements mandated by:

- Migratory Bird Treaty Act (MBTA, 16 U.S.C 703-712; 50 CFR 21).
- Bald and Golden Eagle Protection Act (Eagle Act, 16 U.S.C. 668-668d; 50 CFR 22).

U.S. Fish and Wildlife Service (we, Service) regulations implementing these statutes are in Chapter I, Subchapter B of Title 50, Code of Federal Regulations. These regulations stipulate general and specific requirements that when met allow us to issue permits to authorize activities that are otherwise prohibited.

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

All Service permit applications are in the 3-200 series of forms, each tailored to a specific activity based on the regulatory requirements for specific types of permits. We collect standard identifier information for all permits, such as the name of the applicant and the applicant's address, telephone and fax numbers, social security or tax identification number, and email address. Standardizing general information common to the application forms will make filing of applications easier for the public as well as expedite our review of applications.

The information that we collect on applications and reports is the minimum necessary for us to determine if the applicant meets/continues to meet issuance requirements for the particular activity. Respondents submit application forms periodically, as necessary. Submission of reports is generally on an annual basis, although some are dependent on specific transactions. We examined applications in this collection, focusing on questions frequently misinterpreted or not addressed by applicants. This ICR includes modifications to the format and content of the currently approved applications so that they (a) are easier to understand and complete and (b) will accommodate future electronic permitting. In addition, we have made the following revisions:

Applications

We added a question to each application form except those restricted to State wildlife agencies (3-200-67) and Native American tribes (3-200-15A, 3-200-15B, 3-200-77 and 3-200-78). The question asks if the applicant or any of the owners of the business, if applying on behalf of a business, have been convicted or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the Lacey Act, MBTA or Eagle Act. If they have, they must provide: (a) the individual's name, (b) date of charge, (c) charge(s), (d) location of incident, (e) court, and (f) action taken for each violation. The reason for this question is that, in accordance with 50 CFR 13.21(c), a conviction or entry of a plea of guilty or nolo contendere, for a felony violation of any of these laws disqualifies any such person from

receiving or exercising the privileges of a permit, unless the disqualification has been expressly waived by the Service Director in response to a written petition.

Eliminate Two Forms

We are eliminating two application forms: falconry (3-200-11) and eagle falconry (3-202-17). Federal falconry regulations published on October 8, 2008, eliminated the Federal falconry permit, effective January 1, 2014. All States have adopted their own falconry regulations that meet the standards in the Federal regulations, and falconers are now only required to have State falconry permits. This is one of the Service's burden reduction initiatives.

OMB Control Number 1018-0151

This information collection includes the burden associated with eagle programmatic permits currently covered under OMB Control Number 1018-0151. Application Form 3-200-71 (Eagle Take—Necessary to Protect Interests in a Particular Locality) is used for long-term programmatic permits. These permits allow nonpurposeful take of eagles that is incidental to otherwise lawful actions. We are not making any substantive changes to this form. We have only modified Section D to indicate the new permit fees. Once OMB takes action on this ICR, we will discontinue OMB Control No. 1018-0151.

Eagle Parts for Native American Religious Purposes (Forms 3-200-15A and 3-200-15B)

We have revised the applications that Native Americans use to apply for a permit to possess eagle parts for religious purposes and to order and reorder parts from the Service's National Eagle and Wildlife Repository (NER). The NER receives bald eagle and golden eagle carcasses from agencies, permittees, and others, and distributes carcasses and parts to Native Americans who hold an Eagle Indian Religious permit. The NER conducted a National Tribal consultation in 2012 during which clarification of the form was recommended. The revisions of Eagle Indian Religious Application & First Order (3-200-15A) and Eagle Indian Religious Re-Order Request (3-200-15B) are clearer and eliminate redundancy.

The Migratory Bird and Eagle Acquisition and Transfer Request (Form 3-202-12)

This form was significantly revised to accommodate transfer approval. We must approve the transfer of migratory birds and eagles among possession permittees, such as educators, raptor propagators, falconers. This is necessary to ensure that transferred birds are nonreleasable (releasable birds must be released by the rehabilitator); the recipient has a permit and is qualified and approved to possess the species; the permittee has adequate facilities to house the bird; and the permittee will use the bird for the permitted purpose. The most common transfer scenario is when a rehabilitator determines that a nonreleasable bird is a good candidate for educational programs and an educator wants to receive the bird. Another common transfer is among permitted educators. The form now includes a table listing most transfer scenarios and clarifies which permittee submits the transfer approval form to which permit office and the associated supporting documentation necessary. This revision will resolve confusion for permittees as well as internal staff.

Depredation application (Form 3-200-13)

This form was reorganized and includes a new Take Request Table. This is intended to result in clearer applications for processing and will also facilitate future conversion to epermitting.

Special Purpose Utility application (Form 3-200-81)

This form was revised based on comments received during outreach for this ICR. These permits allow utilities such as electric, wind, and solar companies to collect birds found dead on their property. Two commenters considered parts of the application confusing because it asked the same questions regardless of whether the applicant was a generation facility (e.g., wind,

solar) or a transmission facility (electric). We have adopted recommendations of the commenters to clarify this.

Avian Injury/Mortality Reporting System (AIMRS)

We have made significant changes to the annual report form for Special Purpose Utility permits (3-202-17). We are renaming it Avian Injury/Mortality Report and the data will be housed in Service's Avian Injury/Mortality Reporting System (AIMRS) created to track incidental take of migratory birds and eagles. Our goal is to make reporting more convenient for permittees, but electronic submission will be particularly beneficial for the Service because it will make the data accessible for analysis without staff having to enter it manually. This will make data on this important source of mortality readily available to biologists monitoring the impact of incidental take on populations and working with industry to identify best practices to reduce those impacts.

We will use the Information gathered through AIMRS to track and assess impacts to migratory birds across the entire Nation. Detailed data are needed to complete Cumulative Effects analyses compiled from mortality data collected at local scales so that it can be rolled up into a national scale analysis. In order to ensure that all analyses of these data are accurate, mortality specific information is required to help measure data quality for inclusion in program level decision analyses.

The electronic report form collects both required and voluntary information. Dropdown selections are provided for many of the fields.

Fifteen "Required" fields are denoted in bold red font with two asterisks. This is basic information critical to documenting the mortality. These fields correspond to the information requested in the current paper report form: species; where (State/county; GPS coordinates in decimal degrees) and when the bird was recovered; description (dead, alive, parts); apparent cause of injury or mortality; and disposition of the bird/carcass/parts. "Weather conditions when mortality/injury likely occurred, if known" is no longer considered "Required". Two additional fields would be included as "Required":

(a) distance to project feature(s) bird carcass found near (in feet). This information provides information about the likelihood that the structure contributed to the mortality.

(b) type and configuration of structure and structure information, (e.g., structure type; nameplate information; manufacturer information; model number; height; presence/absence of guy wires; turbine, pole, structure ID#; line name; circuit number; circuit name; etc.). Since structures vary so widely, this information is critical to determine patterns and trends associated with particular types of structures and structure configuration.

Three voluntary "Priority" fields collect the following information:

(a) how the species was identified. This will provide insight into the accuracy of the identification.

(b) additional details on suspected cause of injury/mortality.

(c) level of certainty for suspected cause.

The remaining voluntary fields collect the information listed below, would shed additional light on the circumstances leading to the incident. Patterns in information can help identify potential solutions for the mortality.

Specimen details:

- (a) Local (or Project) specimen number (if applicable)
- (b) Scientific name (include subspecies if known)
- (c) Estimated time dead/Injured before discovery
- (d) Name of individual discovering injury/mortality
- (e) Official cause of death
- (f) Who determined official cause of death? (Lab Name)
- (g) Necropsy (yes/no)?

Location details:

- (h) Transect/Subplot Number
- (i) Feature(s) you see nearby the location where the bird was found
- (j) Azimuth of bird/carcass to project feature
- (k) Describe the habitat surrounding the carcass or injured animal

Weather:

- (l) Estimated weather conditions at time of injury/mortality
- (m) Winds speed (day of death, estimated)
- (n) Max wind gust speed (day of death, estimated)
- (o) Wind direction (day of death, estimated)
- (p) Moon phase (Julian calendar phase)

Disposition:

- (q) Injured animal outcome (if the bird was injured, what was its outcome?)
- (r) Full name of rehabilitation center (if sent to Rehabber) and rehabilitator's federal permit number (if available)

Structure/Configuration/ Mitigation/ Retrofit Information:

- (s) Flight diverters on transmission line?
- (t) Type of flight diverter? (list types)
- (u) Avian Power Line Interaction Committee (APLIC) compliant (if electric utility infrastructure?)
- (v) Describe retrofit and/or mitigation implemented

Additional Information:

- (w) Biometric Data on bird (optional, but could include weight, wing chord, tarsus, tail molt, fat level, brood patch, etc.)
- (x) Additional information and notes (band information, other identifying numbers, etc.)

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].

Forms in this collection will be available to applicants in a fillable format on our forms and permits websites, by mail, or by fax. Applicants may complete the fillable application online, but must send the application form with an original signature and the applicable processing fee by mail. Applicants may send supporting information by email or fax, if we already have their application and they are able to reference an application number. We are actively developing a system for electronic submission of permit application forms or reports; two currently approved applications belonging to a sister program have been launched. We expect to begin testing Form 3-200-8, Taxidermy permits, in the near future.

As discussed above, Report form 3-202-17, Special Purpose-Utility Report, will be converted to a spreadsheet format that can be submitted electronically into the Avian Injury/Mortality Reporting System (AIMRS). Permittees will enter data into an Access database that we provide and then generate Excel reports of their data for electronic submission via a reporting tool programmed into the Access database. The Excel report output from the AIMRS Access Database has been specifically formatted to allow easy, efficient compilation of this information through the use of a macro. When the permittee submits the Excel report to the permit office, these reports will be saved by our permit staff into special folders, compiled automatically, and fed into a cumulative report housed in a centralized Access Database that will be accessible by decision-makers for informing permitting and management decisions.

This is a temporary solution while the online interface is being built to capture this report information directly. However, it is set up to work efficiently and effectively enough to get the data quickly into a format that is immediately available and useful to our staff that needs it most, while we wait for the online system to be developed.

The online interface is being developed with the capability to accept an auto-upload of Excel reports with this format so that data collected while the online system is being developed can be easily back-filled. Users may also choose to continue using the access database and auto-upload their excel report through the online interface instead of entering the information directly.

Therefore, if companies have their own online system, they may submit reports to us from this system; but it is important that the output match the format of the USFWS report output for purposes of easy compilation in the temporary system, as well as easy transference of this data to the online system in the future.

4. Describe efforts to identify duplication.

The information that we collect is unique to the applicant and is not available from any other source. Other than the general identifying information standard for each application, collection of duplicate information is minimal.

Many permittees renew permits for ongoing activities. We retain information from their original application so they do not have to duplicate information that is unchanged for the new permit. If an existing permittee requests a new type of permit (such as a rehabilitator who applies for an education permit), applicants may reference existing permit files for information relevant to the new application. This allows the applicant to submit only the additional information necessary to meet the requirements of a new type of permit.

We developed an electronic permit issuance and tracking system that greatly improves retrieval of file information, further reducing duplicate information requests for use in renewals, extensions, and repeat applications. Ongoing development of our permit issuance and tracking system will ensure that no duplication arises among Service offices.

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

This collection will not have a significant impact on small entities. Small businesses or small entities must provide the same information required of individual applicants. We collect only the minimum information necessary to establish eligibility and to assess the effect of the permit program.

6. Describe the consequence to Federal program or policy activities if the collection were not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If we do not collect the information or if we collect the information less frequently, we could not implement many wildlife protection programs that are mandated by law. Further, we could not issue applicants a permit since the collected information is either required on the permit or authorization itself or is needed to make the necessary biological and legal findings under applicable statutes and treaties. If we were not able to satisfy the information requirements necessary to issue a permit, the public would not be able to conduct otherwise prohibited activities, such as possession of migratory birds and eagles.

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.**

Permit regulations (50 CFR 21.27(c)(5) and 21.30(d)(6)) require that Special Purpose Game Bird and Raptor Propagation permit holders file an FWS Form 3-186A (Migratory Bird Acquisition and Disposition Report) with the Service within 5 days of a transaction (take from the wild, buy, sell, or transfer). Permit regulations (21.29(e)(2)) require that State-permitted falconers file an FWS Form 3-186A within 5 days of a transaction (take from the wild, buy, sell, or transfer). Permit regulations (50 CFR 21.25(c)(5)) require that Waterfowl Sale and Disposal permit holders file an FWS Form 3-186 with the Service by the end of the month during which a waterfowl sale is conducted. The MBTA, which was enacted to protect migratory birds from market hunting, strictly regulates commerce. These are the only four permits that authorize sale and purchase. Current information regarding commercial activity under the permits is necessary to enforce the regulations.

In addition, Scientific Collecting permittees (3-200-7; 3-202-1) and Special Purpose Utility permittees (3-202-81; 3-202-17) who encounter a dead or injured bald eagle or golden eagle, or threatened or endangered species in the wild are required to report it to the Service's Office of Law Enforcement as soon as possible, preferably no later than 48 hours from discovery of the

bird, or at the beginning of the next business day. This short timeframe better enables OLE to investigate the mortality or injury and/or direct the transfer of the carcass while it is still as fresh as possible to the National Eagle and Wildlife Property Repository for distribution to Native Americans for Indian religious purposes.

Permit regulations (50 CFR 13.46) require that records of any taking, possession, transportation, sale, purchase, barter, export or import of wildlife pursuant to a permit be maintained for 5 years from the expiration date of the permit. The statute of limitations for enforcement is 5 years.

- 8. If applicable, 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.

On November 13, 2013, we published in the Federal Register (78 FR 68086) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on January 13, 2014.

We received one comment from the American Bird Conservancy (ABC). The commenter stressed that while “there are ways that the quality, utility and clarity of the information to be collected can be enhanced and ways that a system can be streamlined to “minimize burden of the collection of information on respondents...” he emphasized that “the minimum amount of information to be collected must allow the USFWS to make a valid determination that the proposed action is permissible under the law. Information regarding impact on wild populations, proposed use of the specimens and explanations of necessary mitigation/compensation, when required are thus critical for allowing the USFWS to do its important job of protecting our public trust resources for the benefit of all.”

We appreciate ABC’s comments because they recognize the importance of collecting sufficient information from applicants and permittees to ensure the applicant qualifies for the permit, that issuance of the permit meets issuance criteria, and that report information is sufficient to allow both enforcement of the permits and, particularly where wild birds are concerned, the report information collected contributes to our knowledge of the impacts of utilities and other entities on migratory birds, including eagles.

A significant change we are making is to convert the report form for Special Purpose Utility permits (3-202-17) from paper to electronic format. These permits allow utilities such as electric, wind, and solar companies to collect birds found dead on their property. The data will be housed in the Avian Injury/Mortality Reporting System (AIMRS). Our goal is to make reporting more convenient for permittees, but electronic submission will be particularly beneficial for the Service because it will make the data accessible for analysis without staff having to enter it manually. This will make the data on this important source of mortality readily available to biologists who are monitoring the impacts of incidental take and working with industry to identify best practices to reduce those impacts.

We contacted the individuals below who represent companies that hold Special Purpose Utility permits and submit Special Purpose Utility reports. We solicited comments on draft revisions to the application form (3-200-81) and electronic report form (3-202-17).

Maija E. Benjamins Senior Project Manager Natural Resources and Public Lands Southern California Electric (electric/gas/hydro) Maija.Benjamins@sce.com	Mel Walters Puget Sound Energy (electric/gas/hydro) melvin.walters@pse.com
Mike Best Pacific Gas and Electric (electric/gas/hydro) MBB8@pge.com	Jason Benson Senior Environmental Scientist NV Energy (electric/gas) JBenson@nvenergy.com
Turley, Natalie Idaho Power (electric/gas/hydro) NTurley@idahopower.com	Denise Stelzig Tillamook PUD Power (electric/gas/hydro) dstelzig@tpud.org

We received four comments on the Special Purpose Utility forms. Some of the comments were outside the scope of the application and report forms. We have prepared a fact sheet that addresses some of those comments. One commenter noted that the information requested in the application is already included in their existing permit or reports, forgetting that the purpose of the application form review was to ensure that the form will be clear for new applicants.

As mentioned previously, the Service has traditionally worked closely with utilities to monitor incidental mortalities and help identify ways to reduce them. These mortalities violate the MBTA. (The Service does not have an incidental take permitting program for migratory birds but does have one for eagles as of 2009 (50 CFR 22.26; application 3-200-71.) Special Purpose Utility permits are sufficiently flexible to accommodate situations where the Service and a company have established protocols for reporting or collecting dead or injured eagles, which is critical because many birds/carcasses are located in remote locations.

Accuracy of burden estimate

- One commenter indicated that it would take several days if she were to prepare an application for the first time. The completion time per response in the Service’s burden estimate is eight hours.

Response: Response time will vary depending on the company. Much of the information requested will already be included in documents such as avian protection plans or other or other migratory bird conservation plans. However, the Service agrees that the 8-hour estimation may be low and has increased it to 15 hours. This presumes that 15 hours are dedicated to the task.

Clarity

- Two commenters stated that the questions in Section A of the application were more appropriate for generation facilities such as wind facilities rather than transmission facilities like electric. These questions pertained to the location of the utility, a description of the utility footprint, equipment and structures, and a question pertaining to the habitat around the structures.

Response: We agree. We split the question about the location of the project or utility into two sections, one specific to generation facilities and the other specific to transmission facilities. The question specific to transmission utilities asks only for the States in which the utility is located and a map generally delineating the company's territory. For two questions regarding the utility footprint and surrounding habitat, we revised the application by adding the following language to the two questions: "For transmission utilities, this information may be provided in general terms."

- One commenter stated that the distinction between required and voluntary fields of the report form could be clearer.

Response: Required fields have been placed in bold and red font.

- Three commenters were unclear whether they would be required to submit both quarterly reports and an annual report.

Response: Permit reporting requirements are specified in permits. A permittee is required to submit an annual report regardless of whether he or she is also required to submit immediate eagle incident reports or interim reports. The reason is that the annual report compels the permittee to provide a final tally of mortality data, including correcting erroneous records, completing incomplete records, and including overlooked records. The annual report provides a final statement of the permittee's activities for the report year.

- One commenter requested clarification about the distinction between the Eagle Incident Report and the Eagle Incident Summary Report and whether the signature requirement could be applicable to one report?

Response: The confusion over the Eagle Incident Report and the Eagle Incident Summary Report was resolved by eliminating the Eagle Incident Summary Report as well as the Migratory Bird Incident Summary Report. These were not actual reports but rather a certification statement that the permittee would sign, scan, and email with their data report. However, we have reconsidered the need for this requirement and eliminated it. We regret that the term Summary Report cause confusion but appreciate that the question led us to consider the need for the certification statement.

- Several commenters offered wording and other minor edits or selections for drop-down lists to improve the forms. For instance to add "unknown hawk", "unknown owl", etc., to the species dropdown. Many of these suggestions were adopted.

Minimize burden

- Two commenters suggested permitting submission of an Excel spreadsheet from their existing database would reduce the burden of reporting.

Response: We agree with the commenter, and will allow submission of an excel spreadsheet from their own database as long as it matches the format of the excel output from the Access form (has the same headers in the same order), and at a minimum provides the information identified as "required" (double asterisks, red in the Access form.)

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. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act as explained in the notices portion of all applications.

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.

FWS Form 3-200-77 (Native American Eagle Take) is the application for a permit for Native Americans to take bald or golden eagles from the wild for Indian religious purposes. Typically the eagles are killed. The form includes a question asking the applicant to explain why the take of live eagle(s) from the wild is necessary. We ask that they describe the aspect of the religious ceremony or other religious practice that makes the take of a live eagle(s) from the wild necessary as a central part of the religious ceremony and belief system, and why an eagle carcass, parts, or feathers from another source, such as the National Eagle Repository, will not suffice. We only ask for as much information as we need to evaluate in order to weigh the religious need against our statutory obligation under the Bald and Golden Eagle Protection Act to conserve eagles.

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

We estimate that we will receive 61,623 responses totaling 106,661 annual burden hours for this information collection (see Attachment A). The total dollar value of the annual burden hours is approximately \$3,365,740 (rounded). We used the Bureau of Labor Statistics news release USDL-13-1835, September 11, 2013, Employer Costs for Employee Compensation—June 2013, to estimate average hourly wages:

- Individuals - We used the wage and salary costs for all workers from Table 1, which states an hourly rate of \$21.44. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of \$30.02 (rounded).
- Private Sector - We used the wage and salary costs for all workers from Table 5, which states an hourly rate of \$20.47. To calculate benefits, we multiplied the hourly rate by 1.4, resulting in an hourly cost factor of \$28.66 (rounded).
- State Government - We used the wage and salary costs for all workers from Table 3, which states an hourly rate of \$ 27.16. To calculate benefits, we multiplied the hourly rate by 1.5, resulting in an hourly cost factor of \$40.74.

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 cost burden to respondents for this information collection to be \$1,520,525 (see Attachment A). These costs are primarily for application processing fees,

which range from \$0 to \$36,000. Substantive amendments to certain permit types cost from \$50 for rehabilitation permits to \$1,000 for amendments to programmatic eagle take permits. There are no processing fees for reports. Federal, Tribal, State, and local government agencies and those acting on their behalf are exempt from processing fees. When there is more than one applicable fee, such as for an original permit or an amendment, we have used the higher fee to calculate costs.

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

We estimate the total cost to the Federal Government to administer this information collection will be \$3,047,441 (see Attachment A).

Service biologists (GS-11/13) and permit examiners (GS-9/12), with support of GS-7 staff, will:

- Review and determine the adequacy of the information an applicant provides.
- Conduct any internal research necessary to verify information in the application or evaluate the biological impact of the proposed activity.
- Assess the biological impact of the proposed activity on the bald or golden eagle.
- Evaluate whether the proposed activity meets the issuance criteria.
- Prepare or review NEPA documentation.
- Prepare either a permit or a denial letter for the applicant.
- When necessary to evaluate the impact of the proposed activity, visit the location to examine site-specific conditions.
- Monitor reports.

Permits are processed in our eight Regional Offices, which are located in major cities across the United States. Therefore, we used Office of Personnel Management Salary Table 2013-DCB to determine average hourly wages. We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 13-1835.

The table below shows Federal staff and grade levels performing various tasks associated with this information collection.

POSITION/GRADE	HOURLY RATE	HOURLY RATE INCLUDING BENEFITS	TIME SPENT ON INFORMATION COLLECTION	WEIGHTED AVERAGE \$/HOUR
Clerical - GS-7/step 5 (Receptionist, Office Asst.)	\$22.92	\$34.38	5%	\$ 1.72
Legal documents examiner–GS-9/step 5 (Permit examiner)	28.04	42.06	30%	12.62
Legal documents examiner-GS-11/step 5 (Permit examiner)	33.92	50.88	30%	15.27
Biologist - GS-11/step 5	33.92	55.88	10%	5.59
Supervisor – GS-12/step 5 (Permit Chief)	40.66	60.99	20%	12.20
Management - GS-13/step 5 (Branch/Division Chief, Solicitor)	48.35	72.53	5%	3.63
Weighted Average (\$/hr)				\$51.03

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are estimating 61,623 responses, 106,661 burden hours, and \$1,520,525 in nonhour burden costs. This is a net increase of 4,363 responses, 13,259 burden hours, and \$470,600 in nonhour burden costs from our previous submission.

We are reporting as a program change:

- A decrease of 704 responses, 888 burden hours, and \$70,400 nonhour costs associated with the elimination of falconry and eagle falconry permits. (Burden reduction initiative)
- A decrease of 200 responses and 300 burden hours associated with the removal of the IC for FWS Form 3-200-12 for individuals. This is a ROCIS-forced program change. It is actually an adjustment as a result of our efforts to accurately identify respondent groups

We are reporting as an adjustment the remaining net increase of 5,267 responses, 14,447 burden hours, and \$541,000 in nonhour burden costs. These increases are the result of adjustments to our estimated number of responses and/or burden hours as well as the inclusion of the burden on eagle take long-term programmatic permits (OMB Control Number 1018-0151). We made these adjustments based on our experience in administering this collection over the past years.

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

There are no plans for publication of the results of these information collections.

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.

There are no exceptions to the certification statement.

OMB 1018-0022
BURDEN HOURS, NONHOUR COSTS, AND FEDERAL COSTS

Attachment A

Regulation/ Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden hours	Average Nonhour Burden Cost Per Response	Total Annual Nonhour Burden Cost	Avg Time (hrs) per response for Govt review	Cost to Govt (\$51/hr)
Individuals/Households	5	1.5	8	\$ 30.02	\$ 240.16	\$75	\$ 375.00		
Private Sector	10	1.5	15	\$ 28.66	\$ 429.90	\$75	\$ 750.00		
State/Local/Tribal	0	0	0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	15		23				\$ 1,125.00	1	\$ 765.00
3-200-10f - application SP Miscellaneous									
Individuals/Households	20	2.5	50	\$ 30.02	\$ 1,501.00	\$100	\$ 2,000.00		
Private Sector	25	2.5	63	\$ 28.66	\$ 1,805.58	\$100	\$ 2,500.00		
State/Local/Tribal	5	2.5	13	\$ 40.74	\$ 529.62	\$0	\$ -		
Subtotal	50		126				\$ 4,500.00	2	\$ 5,100.00
3-200- 12 - application Raptor Propagation									
Individuals/Households	5	4	20	\$ 30.02	\$ 600.40	\$100	\$ 500.00		
Private Sector	50	4	200	\$ 28.66	\$ 5,732.00	\$100	\$ 5,000.00		
State/Local/Tribal	0		0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	55		220				\$ 5,500.00	2	\$ 5,610.00
3-200-13 - application Depredation									
Individuals/Households	850	1.75	1,488	\$ 30.02	\$ 44,669.76	\$50	\$ 42,500.00		
Private Sector	1,050	3.5	3,675	\$ 28.66	\$ 105,325.50	\$100	\$ 105,000.00		
State/Local/Tribal	800	3.5	2,800	\$ 40.74	\$ 114,072.00	\$0	\$ -		
Subtotal	2,700		7,963				\$ 147,500.00	2.5	\$ 344,250.00
3-200-14 - application Eagle Exhibition									
Individuals/Households	0	5.5	0	\$ 30.02	\$ -	\$75	\$ -		
Private Sector	100	5.5	550	\$ 28.66	\$ 15,763.00	\$75	\$ 7,500.00		
State/Local/Tribal	20	5.5	110	\$ 40.74	\$ 4,481.40	\$0	\$ -		
Subtotal	120		660				\$ 7,500.00	4	\$ 24,480.00
3-200-15a - application Eagle Indian Religious Application & First Order									
Individuals/Households	2,000	1	2,000	\$ 30.02	\$ 60,040.00	\$0	\$ -		
Private Sector	0		0	\$ 28.66	\$ -	\$0	\$ -		
State/Local/Tribal	0		0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	2,000		2,000				\$ -	2	\$ 204,000.00
3-200-15b - application Eagle Indian Religious Reorder									
Individuals/Households	2,700	0.5	1,350	\$ 30.02	\$ 40,527.00	\$0	\$ -		
Private Sector	0		0	\$ 28.66	\$ -	\$0	\$ -		
State/Local/Tribal	0		0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	2,700		1,350				\$ -	0.5	\$ 68,850.00
3-200- 16 - application Take of Depredating Eagles									
Individuals/Households	0	3.5	0	\$ 30.02	\$ -	\$100	\$ -		
Private Sector	3	3.5	11	\$ 28.66	\$ 315.26	\$100	\$ 300.00		
State/Local/Tribal	3	3.5	11	\$ 40.74	\$ 448.14	\$0	\$ -		
Subtotal	6		22				\$ 300.00	2	\$ 612.00
3-200- 18 - application Take of Golden Eagle Nests									
Individuals/Households	0		0	\$ 30.02	\$ -	\$100	\$ -		
Private Sector	4	6.5	26	\$ 28.66	\$ 745.16	\$100	\$ 400.00		
State/Local/Tribal	0		0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	4		26				\$ 400.00	2	\$ 408.00

OMB 1018-0022
BURDEN HOURS, NONHOUR COSTS, AND FEDERAL COSTS

Attachment A

Regulation/ Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden hours	Average Nonhour Burden Cost Per Response	Total Annual Nonhour Burden Cost	Avg Time (hrs) per response for Govt review	Cost to Govt (\$51/hr)
3-200-67 - application Special State Canada Goose									
Individuals/Households	0		0	\$ 30.02	\$ -	\$0	\$ -		
Private Sector	0		0	\$ 28.66	\$ -	\$0	\$ -		
State/Local/Tribal	1	7	7	\$ 40.74	\$ 285.18	\$0	\$ -		
Subtotal	1		7				\$ -	5	\$ 255.00
3-200-68 - application Renewal of Permit									
Individuals/Households	1,300	1.5	1,950	\$ 30.02	\$ 58,539.00	\$100	\$ 130,000.00		
Private Sector	2,750	1.5	4,125	\$ 28.66	\$ 118,222.50	\$100	\$ 275,000.00		
State/Local/Tribal	1,000	1.5	1,500	\$ 40.74	\$ 61,110.00	\$0	\$ -		
Subtotal	5,050		7,575				\$ 405,000.00	1.5	\$ 386,325.00
3-200-71 - application Eagle Take (Disturb)									
Individuals/Households	25	16	400	\$ 30.02	\$ 12,008.00	\$500	\$ 12,500.00		
Private Sector	120	16	1,920	\$ 28.66	\$ 55,027.20	\$500	\$ 60,000.00		
State/Local/Tribal	5	16	80	\$ 40.74	\$ 3,259.20	\$0	\$ -		
Subtotal	150		2,400				\$ 72,500.00	20	\$ 153,000.00
3-200-72 - application Eagle Nest Take									
Individuals/Households	10	16	160	\$ 30.02	\$ 4,803.20	\$500	\$ 5,000.00		
Private Sector	20	16	320	\$ 28.66	\$ 9,171.20	\$500	\$ 10,000.00		
State/Local/Tribal	20	16	320	\$ 40.74	\$ 13,036.80	\$0	\$ -		
Subtotal	50		800				\$ 15,000.00	27	\$ 68,850.00
3-200-71 & 72 - application Eagle/Nest Take Amendment									
Individuals/Households	5	6	30	\$ 30.02	\$ 900.60	\$150	\$ 750.00		
Private Sector	20	6	120	\$ 28.66	\$ 3,439.20	\$150	\$ 3,000.00		
State/Local/Tribal	15	6	90	\$ 40.74	\$ 3,666.60	\$0	\$ -		
Subtotal	40		240				\$ 3,750.00	10	\$ 20,400.00
3-200-71 & 72 - application Eagle Take Programmatic Permit									
Individuals/Households	1	452	452	\$ 30.02	\$ 13,569.04	\$36,000	\$ 36,000.00		
Private Sector	18	452	8,136	\$ 28.66	\$ 233,177.76	\$36,000	\$ 648,000.00		
State/Local/Tribal	1	452	452	\$ 40.74	\$ 18,414.48	\$0	\$ -		
Subtotal	20		9,040				\$ 684,000.00	444	\$ 452,880.00
3-200-71 & 72 - application Eagle Nest/Take Programmatic Amendment									
Individuals/Households	1	70	70	\$ 30.02	\$ 2,101.40	\$1,000	\$ 1,000.00		
Private Sector	1	70	70	\$ 28.66	\$ 2,006.20	\$1,000	\$ 1,000.00		
State/Local/Tribal	1	70	70	\$ 40.74	\$ 2,851.80	\$0	\$ -		
Subtotal	3		210				\$ 2,000.00	444	\$ 67,932.00
3-200-77 - application Native American Eagle Take									
Individuals/Households	5	2.25	11	\$ 30.02	\$ 330.22	\$0	\$ -		
Private Sector	0		0	\$ 28.66	\$ -	\$0	\$ -		
State/Local/Tribal	5	2.25	11	\$ 40.74	\$ 448.14	\$0	\$ -		
Subtotal	10		22				\$ -	8	\$ 4,080.00
3-200-78 - application Native American Eagle Aviary									
Individuals/Households	0	5	0	\$ 30.02	\$ -	\$0	\$ -		

OMB 1018-0022
BURDEN HOURS, NONHOUR COSTS, AND FEDERAL COSTS

Attachment A

Regulation/ Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden hours	Average Nonhour Burden Cost Per Response	Total Annual Nonhour Burden Cost	Avg Time (hrs) per response for Govt review	Cost to Govt (\$51/hr)
Private Sector	0	5	0	\$ 28.66	\$ -	\$0	\$ -		
State/Local/Tribal	5	5	25	\$ 40.74	\$ 1,018.50	\$0	\$ -		
Subtotal	5		25				\$ -	6	\$ 1,530.00
3-200-79 - application Special Purpose Abatement									
Individuals/Households	0	2.5	0	\$ 30.02	\$ -	\$100	\$ -		
Private Sector	25	2.5	63	\$ 28.66	\$ 1,805.58	\$100	\$ 2,500.00		
State/Local/Tribal	0	2.5	0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	25		63				\$ 2,500.00	2	\$ 2,550.00
3-200-81 - application Special Purpose Utility									
Individuals/Households	0		0	\$ 30.02	\$ -	\$100	\$ -		
Private Sector	30	15	450	\$ 28.66	\$ 12,897.00	\$100	\$ 3,000.00		
State/Local/Tribal	0		0	\$ 40.74	\$ -	\$0	\$ -		
Subtotal	30		450				\$ 3,000.00	2	\$ 3,060.00
3-200-82 - application Eagle Transport									
Individuals/Households	0		0	\$ 30.02	\$ -	\$75	\$ -		
Private Sector	5	1	5	\$ 28.66	\$ 143.30	\$75	\$ 375.00		
State/Local/Tribal	5	1	5	\$ 40.74	\$ 203.70	\$0	\$ -		
Subtotal	10		10				\$ 375.00	1	\$ 510.00
Eagle Take Programmatic Transfer									
Individuals/Households	1	40	40	\$ 30.02	\$ 1,200.80	\$ 1,000.00	\$ 1,000.00		
Private Sector	1	40	40	\$ 28.66	\$ 1,146.40	\$ 1,000.00	\$ 1,000.00		
State/Local/Tribal	1	40	40	\$ 40.74	\$ 1,629.60	\$ -	\$ -		
Subtotal	3		120				\$ 2,000.00	444	\$ 67,932.00
3-200-72 - application Eagle Nest Take Programmatic									
Individuals/Households	1	40	40	\$ 30.02	\$ 1,200.80	\$ -	\$ -		
Private Sector	8	40	320	\$ 28.66	\$ 9,171.20	\$ -	\$ -		
State/Local/Tribal	1	40	40	\$ 40.74	\$ 1,629.60	\$ -	\$ -		
Subtotal	10		400				\$ -		\$ -
3-200-72 - application Eagle Nest Take Programmatic Amendment									
Individuals/Households	1	20	20	\$ 30.02	\$ 600.40	\$ -	\$ -		
Private Sector	1	20	20	\$ 28.66	\$ 573.20	\$ -	\$ -		
State/Local/Tribal	0	20	0	\$ 40.74	\$ -	\$ -	\$ -		
Subtotal	2		40				\$ -		\$ -
3-202-1 - report - Scientific collecting									
Individuals/Households	100	1	100	\$ 30.02	\$ 3,002.00	\$0	\$ -		
Private Sector	130	1	130	\$ 28.66	\$ 3,725.80	\$0	\$ -		
State/Local/Tribal	350	1	350	\$ 40.74	\$ 14,259.00	\$0	\$ -		
Subtotal	580		580				\$ -	1	\$ 29,580.00
3-202-2 - report Waterfowl Sale and Disposal									
Individuals/Households	100	0.5	50	\$ 30.02	\$ 1,501.00	\$0	\$ -		
Private Sector	900	0.5	450	\$ 28.66	\$ 12,897.00	\$0	\$ -		
State/Local/Tribal	0	0.5	0	\$ 40.74	\$ -	\$0	\$ -		

