

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

**National Wildlife Refuge Visitor Check-In Permit and Use Report
FWS Form 3-2405**

OMB Control Number 1018-0153

Terms of Clearance. None.

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

The National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee), as amended (Administration Act), and the Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act) govern the administration and uses of national wildlife refuges and wetland management districts. The Administration Act consolidated all the different refuges into a single "Refuge System." It also authorizes us to permit public uses on lands of the Refuge 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 the use is not inconsistent or does not interfere with the primary purpose(s) of the refuge.

We make provisions in our general refuge regulations (50 CFR 25, 26, 27, 30, 31, and 32) for public entry for specialized purposes. Wildlife-dependent recreation programs on refuges must be monitored on a regular basis to ensure the refuge is meeting its objectives while at the same time providing safe, quality experiences for visitors. We use FWS Form 3-2405 to collect visitor data that will allow refuge managers to monitor, evaluate, and adaptively manage programs to meet established standards. Refuges that have limited activities may be able to collect information by a nonform method, such as a sign-in sheet or verbally.

We have 591 refuges and wetland management districts, of which approximately 459 are open to the public. Visitors participating in public use programs are frequently in remote locations on some refuges. When used, the form must be displayed in the visitor's vehicle while on the refuge. This ensures a much shorter response time by law enforcement and/or search and rescue personnel when there is a call for help.

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

We collect information on hunters and anglers and other visitors in order to protect refuge resources and administer and evaluate the success of visitor programs. Because of high demand and limited resources, we often provide visitor opportunities by permit, based on dates, locations, or type of public use. We may not allow all opportunities on all refuges and harvest information differs for each refuge. Not all refuges will use the form and some refuges may collect the information in a nonform format (through discussions in person or over the phone, by sign-in sheet, by email, or by post card). In some instances, respondents will be able to provide information verbally. Because of the span of activities 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 form. However, refuge managers cannot ask for more or different information. The burden listed in item 12 includes any nonform collection.

We have designed the form generically so that it can be used by any refuge. The form will be customized for each refuge; e.g., name of refuge, species and method of harvest, activities,

maps, permit number, etc. An example of a customized form for Tensas River National Wildlife Refuge is attached as a supplementary document to the IC. The form has three parts:

- Self-Clearing Daily Check-in Permit. Each user completes this portion of the form (date of visit, name, and telephone numbers) and deposits it in the permit box prior to engaging in any activity on the refuge.
- Self-Clearing Daily Visitor Registration Permit. Each user must complete the front side of the form (date, name, city, State, zip code, and purpose of visit) and carry this portion while on the refuge. At the completion of the visit, each user must complete the reverse side of the form (number of hours on refuge, harvest information (species and number), harvest method, angler information (species and number), and wildlife sighted (e.g., black bear and hog) and deposit it in the permit box.
- Self-Clearing Daily Vehicle Permit. The driver and each user traveling in the vehicle must complete this portion (date) and display in clear view in the vehicle while on the refuge.

We use FWS Form 3-2405 to collect:

- Information on the visitor (name, address, and contact information). This information is used to identify the visitor or driver/passenger of a vehicle while on the refuge. This is extremely valuable information should visitors become lost or injured. Law enforcement officers can easily check vehicles for these cards in order to determine a starting point for the search or to contact family members in the event of an abandoned vehicle. Having this information readily available is critical in a search and rescue situation.
- Purpose of visit (hunting, fishing, wildlife observation, wildlife photography, auto touring, birding, hiking, boating/canoeing, visitor center, special event, environmental education class, volunteering, other recreation). This information is critical in determining public use participation in wildlife management programs. This not only allows the refuge to manage its hunt and other visitor use programs, but also to increase and/or improve facilities for nonconsumptive uses that are becoming more popular on refuges. Data collected will also help managers better allocate staff and resources to serve the public as well as develop annual performance measures.
- Whether or not hunters/anglers were successful (number and type of harvest/caught). This information is critical to wildlife management programs on refuges. Each refuge will customize the form by listing game species and incidental species available on the refuge, hunting methods allowed, and data needed for certain species (e.g., for deer, whether it's a buck or doe and the number of points; or for turkeys, the weight and beard and spur lengths).
- Whether or not visitors observed black bear or hogs, for example. This information will help managers develop annual performance measures for hog removal and also provide information to help develop resource management planning.
- Date of visit and/or area visited.
- Comments. We encourage visitors to comment on their experience.

This above information will be a vital tool in meeting refuge objectives and maintaining quality visitor experiences. The information will help us:

- Administer and monitor visitor programs and facilities on refuges.
- Distribute visitor permits to ensure safety of visitors.
- Ensure a quality visitor experience.
- Minimize resource disturbance, manage healthy game populations, and ensure the protection of fish and wildlife species.
- Assist in Statewide wildlife management and enforcement and develop reliable estimates of the number of all game fish and wildlife.
- Determine facility and program needs and budgets.

Forms will be provided by the refuge and available at entrances to the refuge. Summary data includes number of visitors, number of hours spent on the refuge, and harvest information. The summary of harvest information may be shared with State Departments of Wildlife and Fisheries in an effort to assist in the management of wildlife species throughout the State. This summary information is a valuable tool for determining wildlife populations, which affects future hunting seasons and bag limits.

Summary information will be shared with National Wildlife Refuge System offices and may be disseminated to the public in planning documents such as Refuge Comprehensive Conservation plans, State Fish and Game Coordination meetings, and refuge budget planning documents.

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].

When the form is used, a printed form is the only viable option. Portions of the forms will be displayed in the vehicle, carried by the user, or deposited in collection boxes. Each form will have a distinct, preprinted or stamped permit number. Forms must be legible, contain required information in the event of an emergency situation, and be a specific size for deposit in a collection box. Forms will be located at entrances to the refuges. Use of automated systems to record onsite visits is not feasible.

4. Describe efforts to identify duplication.

The information collected is refuge visit specific. Three questions regarding hunting and fishing are somewhat similar to questions found on the multiple hunting and fishing application and report forms (OMB Control No. 1018-0140). The forms approved under 1018-0140 are designed mainly for those refuges that conduct limited hunts or hunts by lottery. Refuges that use FWS Form 3-2405 will not use the hunting and fishing application and report forms approved under 1018-0140. Therefore, identical information on each refuge visit will not be collected.

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

This collection will not impact small businesses or other small entities.

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.

Not conducting the collection would seriously impact both management of the refuge as well as safety of the public. As stated above, safety is a primary concern in a remote location and this collection will save valuable time and resources during an emergency situation. Conducting the collection on a daily basis allows us to maintain a safe, enjoyable experience for our visitors. Emergencies can happen at any time and not having this information on a daily basis would impede the efforts of law enforcement personnel in a time of crisis. There have been incidences where hunters have not returned home when expected. When notified of this, law enforcement personnel may be tasked with searching a 50,000 acre refuge complex to ensure the safety of that visitor.

As a management tool, it is critical to understand public use trends and receive harvest data in order to complete our mission. The National Wildlife Refuge Improvement Act directs us to facilitate compatible wildlife-dependent recreation. However, without accurate data about increased visitation to refuges there may be conflicts between uses and/or unavoidable wildlife disturbance. Refuge managers use this data to establish use limits for specific activities and areas in order to minimize conflicts between uses on the refuge.

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.**

We ask refuge visitors to provide this information each time they enter the refuge. Therefore, visitors must respond in fewer than 30 days and it is likely many visitors will complete the form more frequently than quarterly. This is necessary to ensure visitor safety and obtain accurate data on visitor activities. There are no other circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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 June 23, 2015, we published in the *Federal Register* (80 FR 35969) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on August 24, 2015. We received one comment. The commenter objected to the requirement to sign in to enter a refuge and objected to the use of taxpayer dollars to collect this information. We use this information to identify the visitor or driver/passengers of a vehicle while on the refuge. Having this information readily available is critical in a search and rescue situation. We have not made any changes to our requirements, based on this comment.

In addition to the above notice, we provided the form and a comment card to seven members of the visiting public at some of our Southeast Region refuges. We asked them: to evaluate the form; whether or not the collection of information is necessary; about the accuracy of our estimate of the burden; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on respondents. Comments were received from the following visitors. All comments were very positive and in support of the method of data collection. There were no recommendations on the burden estimate.

Larry Keith	Baton Rouge, LA.	John Hanks	Farmerville, LA
Cole Brazle	Starkville, MS	Gary Peters	Crowville, LA
Yolanda Long	Macon, MS	Alan Dupuy	Winnsboro, LA
Jeremy Kennedy	West Monroe, LA		

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. We maintain the information in accordance with the Privacy Act system of records - National Wildlife Refuge Special Use Permits—Interior, FWS-5.

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 expect an average of 650,000 responses totaling 54,167 annual burden hours. This includes any nonform collection of data.

We estimate the dollar value of the burden hours to be \$1,723,052. Refugee visitors represent a variety of professions and income levels. We used the BLS Bulletin USDL 15-1132, released June 10, 2015, to estimate hourly wages and calculate benefits (http://www.bls.gov/news.release/archives/ecec_06102015.pdf). Table 1 lists an hourly wage of \$22.72 for all workers. We multiplied the hourly rate by 1.4 to account for benefits, resulting in an hourly rate of \$31.81.

Activity	Annual Number of Respondents	Annual Number of Responses	Completion Time per response	Total Annual Burden Hours	Hourly rate including benefits	Total \$ Value of Burden Hours
FWS Form 3-2405	650,000	650,000	5 minutes	54,167	\$31.81	\$1,723,052

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

There is no nonhour cost burden.

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

We estimate the total annual cost to the Federal Government to administer this information collection will be \$3,967,335 (\$3,937,905 for salary/benefits (rounded) and \$ 29,430 for overhead (printing, copying, etc.)). We estimate that it will take 10 minutes to process each visitor use report or a total of 108,333 hours. See tables below for salary/benefit information. We used the Office of Personnel Management's Salary Table 2015-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/RUS_h.pdf) to determine the hourly wages. We multiplied the hourly wages by 1.5 to account for benefits (Bureau of Labor Standards news release USDL 15-1132, June 10, 2015, http://www.bls.gov/news.release/archives/ecec_06102015.pdf).

Position	Grade	Hourly pay rate	Hourly rate including benefits	Percent of time spent on collection	Weighted average (\$/hr)
Clerical, unskilled (i.e. receptionist, office asst.)	GS 7 step 5	\$21.49	\$32.24	80%	\$25.79
Professional and technical staff (biologist, outdoor recreation planner)	GS-11 step 5	\$31.80	\$47.70	15%	7.16
Management (Refuge Manager)	GS 13 step 5	\$45.33	\$68.00	5%	3.40
Weighted Avg (\$/hr)					\$36.35

Estimated salary/benefits cost to Federal Government to process visitor use reports is \$3,937,904.55 (\$36.35 weighted average \$/hr x 108,333 hours).

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

There are no program changes or adjustments.

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

Data collected from these forms will include harvest summary information. All data collected will remain in summary format and will in no way be linked to any personal information. The personal information will not be recorded and is only necessary to address the safety issues on the day(s) of the visit as stated above. Harvest and public use data will be used internally for reporting purposes.

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.