

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

**Federal Fish and Wildlife Permit Applications and Reports –
Native Endangered and Threatened Species; 50 CFR 10, 13, and 17**

OMB Control Number 1018-0094

Terms of Clearance: None.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Endangered Species Act (Act) (16 U.S.C. 1531 et seq.) was established to provide a means to conserve the ecosystems upon which endangered and threatened species depend, to provide a program for the conservation of these endangered and threatened species, and to take the appropriate steps that are necessary to bring any endangered or threatened species to the point where measures provided for under the Act are no longer necessary. Section 10(a)(1) (A) of the Act authorizes us to issue permits for otherwise prohibited activities in order to enhance the propagation or survival of the affected species. ESA Section 10(d) requires that such permits be applied for in good faith and, if granted, will not operate to the disadvantage of endangered species, and will be consistent with the purposes of the Act.

We (the U.S. Fish and Wildlife Service, Service) collect information associated with application forms 3-200-54, 3-200-55, 3-200-56, associated permits issued based on these applications, and annual report forms 3-202-55b, c, d, e, and f to determine the eligibility of applicants for permits requested in accordance with the criteria in Section 10 of the Act.

Our regulations implementing this statute are in Chapter I, Subchapter B of Title 50 of the Code of Federal Regulations (CFR) (50 CFR 13 and 50 CFR 17). The regulations stipulate general and specific requirements that, when met, allow us to issue permits to authorize activities that are otherwise prohibited.

Upon receipt of a complete application, the Director may issue a permit authorizing any activity otherwise prohibited by §17.21, in accordance with the issuance criteria of this section, for scientific purposes, for enhancing the propagation or survival, or for the incidental taking of endangered wildlife. Such permits may authorize a single transaction, a series of transactions, or a number of activities over a specific period of time. (See §17.32 for permits for threatened species.)

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

All Service permit applications are in the 3-200 series of forms, each tailored to a specific activity based on the requirements for specific types of permits. We collect standard identifier information for all applications for permits, such as the name of the applicant and the applicant's address, telephone numbers, if applicable, tax identification number, email address, description of activity being requested under the Endangered Species Act (ESA), and, after the permit has been issued, a report (description of activity that was conducted under that permit).

Standardization of general information common to the application forms makes the filing of applications easier for the public and helps to expedite our review.

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 they are requesting to conduct with respect to endangered and threatened species. Respondents submit application forms periodically as needed. Submission of reports is generally on an annual basis, but for some activities, (such as activities associated with sea turtles), may be on a more frequent basis, as needed (see those specific reporting forms). This information collection request (ICR) includes minor modifications to the layout and content of the currently approved application forms so that they:

- (a) are easier to understand and complete,
- (b) Minimize the number of completed pages the applicant must submit, and
- (c) accommodate future electronic permitting.

We use the following permit application forms for activities associated with native endangered and threatened species:

- **FWS Form 3-200-54** - Enhancement of Survival Permits Associated with Safe Harbor Agreements and Candidate Conservation Agreements with Assurances.
- **FWS Form 3-200-55** - Permits for Scientific Purposes, Enhancement of Propagation or Survival (i.e, Recovery) and Interstate Commerce.
- **FWS Form 3-200-56** - Incidental Take Permits Associated with a Habitat Conservation Plan.

In addition to the application forms, permit holders must submit the reports in accordance with their permits issued based on 50 CFR 17. Some Service annual reports associated with permits are in the 3-202 series of forms, each tailored to a specific activity based on the requirements for specific types of permits. In some cases, specific information collection forms have been developed to facilitate and standardize the reporting and review, and to facilitate development of electronic forms and electronic reporting and retrieval of that information.

Annual reporting of the results subsequent to the activity authorized by the permit is required in most cases (under the authority of section 10(a)(1)(A) of the ESA and its implementing regulations at 50 CFR 17.) These reports allow us to evaluate the success of the project, formulate further research, and develop and adjust management and recovery plans for the species. The following reports have been developed that are specific to particular species.

- **Annual Report Form 3-202-55b** for activities associated with Native Endangered and Threatened Species Permits Under The Endangered Species Act (ESA Recovery Permits: Region 3 Bat [Reporting Spreadsheet](#)).
- **Annual Report Form 3-202-55c** for activities associated with Native Endangered and Threatened Species Permits Under The Endangered Species Act (ESA Recovery Permits: Region 4 Bat [Reporting Spreadsheet](#)).
- **Annual Report Form 3-202-55d** for activities associated with Native Endangered and Threatened Species Permits Under The Endangered Species Act (ESA Recovery

Permits: Region 5 Bat [Reporting Spreadsheet](#)).

- **Annual Report Form 3-202-55e** for activities associated with Native Endangered and Threatened Species Permits Under The Endangered Species Act (ESA Recovery Permits: Region 6 Bat [Reporting Spreadsheet](#)).
- **FWS Form 3-202-55f** (Non-Releasable Sea Turtle Annual Report).
- **FWS Form 3-202-55g** (Sea Turtle Rehabilitation Quarterly Report Form).

Additionally,

- Private landowners who have an Enhancement of Survival Permit (and accompanying Safe Harbor Agreement or Candidate Conservation Agreement with Assurances) must notify us if their land management activities incidentally take a listed or candidate species covered under their permit.
- We issue Enhancement of Survival Permits to the landowners, and their name is printed on the permit. If ownership of the land changes, this permit does not automatically transfer to the new landowner. Therefore, we ask the permittee to notify us if there is a change in land ownership so that we may update the permit.

If a recovery or interstate commerce permit authorizes activities that include keeping wildlife in captivity, we ask the permittee to notify us if any of the captive wildlife escape.

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 are available to applicants in a fillable format on our forms and permits websites, by mail, or by fax. Applicants may complete the fillable portion of the application forms in Adobe Acrobat, 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.

The Service has a system for electronic submission of permit application forms, processing fees, or reports. In January 2013, the Service launched a web-based e-Permits system that allows the public to complete certain application forms for permits, submit the completed forms to us, pay application processing fee, and submit the required reports to us in electronic format—via the e-Permits website. One Service permit application form is already available to the public via the e-Permits website. The Service is in the process of converting the remainder of the permit application forms into the e-Permits system, and we are currently pilot testing two Service permit application forms that have current OMB approval.

Some reports are available on our website, see

<https://www.fws.gov/Midwest/endangered/mammals/inba/inbasummersurveyguidance.html>.

4. Describe efforts to identify duplication. Show specifically why any similar

information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information is unique to the applicant and/or permittee with respect to the particular research, project, Habitat Conservation Plan (HCP), or Safe Harbor Agreement (SHA), and is not available from any other source. ***We do, when feasible, coordinate with State wildlife agencies, regarding collection of information.*** Other than the general information standard for each application, collection of duplicate information is minimal. We retain application information in the FWS permitting system (SPITS) to eliminate repeat or duplicate requests in the case of renewals, extensions, or repeat applications.

We retain information from original applications so permittees do not have to submit duplicate information that is unchanged for new permits or to amend existing permits. We developed an electronic permit issuance and tracking system that allows for retrieval of file information, further reducing duplicate information requests for use in renewals, extensions, and repeat applications.

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

This collection will not have a significant impact on small entities. The collection of information is voluntary, and we use the information collected to implement Section 10 of the Endangered Species Act. Descriptions of the types of permits under ESA Section 10 follow.

HCPs. An incidental take permit is required when non-Federal activities will result in “take” of threatened or endangered wildlife. A HCP must accompany an application for an incidental take permit. The purpose of the habitat conservation planning process associated with the permit is to ensure there is adequate minimizing and mitigating of the effects of the authorized incidental take. The purpose of the incidental take permit is to authorize the incidental take of a listed species, not to authorize the activities that result in take.

HCPs are planning documents required as part of an application for an incidental take permit. They describe the anticipated effects of the proposed taking; how those impacts will be minimized or mitigated and how the HCP is to be funded. On June 28, 2016 (81 FR 41986), the Service and the National Marine Fisheries Service announced the availability of and requested public comment on a draft revision of its joint Habitat Conservation Plan (HCP) Handbook, which describes requirements, procedures, and guidance for permit issuance and conservation-plan development. The HCP Handbook initially was released in 1996, and revised by addendum in July 2000. For additional information on HCPs, see <https://www.fws.gov/endangered/esa-library/pdf/hcp.pdf>.

SHA and Candidate Conservation Agreements (CCAAs). On June 17, 1999, the Service issued two policies and published revisions of its regulations to add two categories of permits to enhance the propagation or survival of listed, proposed, candidate, and other at-risk species. On May 4, 2016, the Service published a proposed rule: “Revisions to the Regulations for Candidate Conservation Agreements With Assurances.” One category, called “permits for the enhancement of survival through Safe Harbor Agreements,” is detailed at 50 CFR 17.22(c) and 17.32(c) (for endangered and threatened species, respectively), and in the Safe Harbor Policy (64 FR 32717). The other category, called “permits for the enhancement of survival through Candidate Conservation Agreements with Assurances,” is detailed at 50 CFR 17.22(d) and 17.32(d) (for endangered and threatened species, respectively), and in the Candidate

Conservation Agreements with Assurances Policy (64 FR 32726). The Safe Harbor policy and associated regulations are intended to facilitate the conservation of listed species through a collaborative approach with non-Federal property owners.

The policy and regulations are designed to create incentives for non-Federal property owners to implement voluntary conservation measures for certain listed species by providing certainty with regard to possible future restrictions should the covered species later become more numerous as a result of the actions taken by the non-Federal cooperator. Non-Federal property owners, who through a Safe Harbor Agreement commit to implement voluntary conservation measures for a listed species, will receive assurances that no additional future regulatory restrictions will be imposed. When the property owner meets the issuance criteria of the regulations we will issue an enhancement of survival permit under section (10)(a)(1)(A) of the Act, authorizing incidental taking of the covered species at a level that enables the property owner to return the property back to population levels or habitat conditions agreed upon as baseline. Before issuing such a permit, we must make a written finding that all covered species in the SHA will receive a net conservation benefit from management actions taken pursuant to the agreement.

Candidate Conservation Agreements with Assurances are voluntary agreements between us and non-Federal property owners to benefit proposed species, candidate species, and species likely to become candidates in the near future. Under a CCAA, non-Federal property owners commit to implement mutually agreed upon conservation measures which, when combined with benefits that would be achieved if it is assumed that those conservation measures were to be implemented on other necessary properties, would preclude the need to list the covered species. In return for the cooperator's proactive management, we provide an enhancement of survival permit under section 10(a)(1)(A) of the Act, which, if the species were to become listed, would authorize take of individuals or the modification of habitat conditions to the levels specified in the CCAA. For additional information on SHAs or CCAAs, please see <https://www.fws.gov/endangered/esa-library/index.html>.

Recovery and Research Permits (3-200-55, and 3-202-55b, c, d, e, f). For endangered species, permits may be issued for scientific research, enhancement of propagation or survival, and taking that is incidental to an otherwise lawful activity. For threatened species, in addition to the above activities, permits also may be issued for zoological, horticultural, or botanical exhibition; educational use; and special purposes consistent with the ESA. Reports describing activities conducted and results are required and associated with these permits.

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 we do not collect the information or if we collected 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, certificate, or authorization letter, since the collected information is either required on the permit, certificate, or authorization itself, or is needed to make the necessary biological and legal findings under applicable statutes and treaties. In certain cases where programmatic, biological, and/or legal findings can be made as a result of an initial application, we can use a less burdensome process for subsequent requests, as long as the information provided to make the original findings remains the same.

7. Explain any special circumstances that would cause an information collection to be

conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No special circumstances exist that require us to collect the information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify 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 and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On October 3, 2016, (81 FR 68029), we published a notice of our intent to request that OMB approve this ICR in the Federal Register. In that notice, we solicited comments for 60 days, ending on December 2, 2016. We did not receive any comments in response to that notice.

In addition to publishing the notice in the Federal Register, we contacted nine (9) individuals familiar with this collection of information to solicit feedback on this ICR:

Individuals contacted as part of the outreach were as follows:

Form	Permittee contacted	Title
3-200-54	Oregon Department of Fish and Wildlife	Deputy Fish Administrator, Inland Fisheries
3-200-56	Montana Department Of Natural Resources and Conservation	Director
Sea Turtles Forms	M.D., Institute for Marine Mammal Studies	Director
Sea Turtles Forms	Marine Mammal and Sea Turtle Rescue and Stranding Coordinator—Coastal Wildlife Network, Audubon Aquarium	Marine Mammal and Sea Turtle Rescue and Stranding Coordinator
Sea Turtles Forms	Animal Records, Fort Worth Zoo	Curator
3-202-55b, Bats Form	Tragus Environmental Consulting, Inc.	President
3-202-55b, Bats Form	Bat Conservation and Management, Inc.	Biological Consultant
3-202-55c, Bats Form	Alabama Department of Transportation	Biologist
3-202-55d, Bats Form	United Tribes Technical College	Environmental Science Instructor

Despite attempts to solicit feedback from the agencies/organizations for Forms 3-200-54, 3-200-56, 3-202-55b, 3-202-55c, and 3-202-55d, no responses were received. We randomly selected permittees to provide feedback on the three application forms and the bat forms. We did receive feedback from the three organizations contacted regarding the sea turtle forms.

In addition to the agencies/organizations identified above, we also attempted to solicit feedback from the below listed Federal agencies on the forms listed:

Form	Permittee contacted	Title
3-200-55	Bureau of Reclamation	Biologist
3-200-55	U.S. Geological Survey, WERC, San Francisco Bay Estuary F.S.	Research Wildlife Biologist
3-200-55	U.S. Geological Survey, Columbia River Research Laboratory	Biologist
3-202-55b, Bats Form	U.S. Forest Service	Forest Supervisor
3-202-55c, Bats Form	Mammoth Cave National Park	Superintendent
3-202-55d, Bats Form	U.S. Forest Service - Black Hills National Forest	Forest Supervisor

Comments received on Bats Survey forms: No comments received

Comments on Sea turtles forms: One commenter indicated that the questions were appropriate and that it only takes a few minutes to complete each form, as needed.

Necessity of Collection: No comments were received.

Burden Estimates: No comments were received.

Ways to Enhance the Quality, Utility, and Clarify of Information. No comments were received.

Ways to Minimize Burden. No comments were received.

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. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (Permits System, FWS-21, 68 FR 52610).

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate the total dollar value of the annual burden hours for this collection to be \$4,233,334 (rounded). We estimate that there will be approximately 4,051 respondents annually for the applications and reports included in this ICR totaling 114,075 (rounded to match ROCIS) annual burden hours. The completion times for each information collection vary substantially

depending on the complexity and geographic scope of the activity, as well as the number of species covered under the activity.

We used the Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the total annual burden.

- Individuals. Table 1 lists the hourly rate for all workers \$34.15, including benefits.
- Private Sector. Table 5 lists the hourly rate for all workers as \$32.27, including benefits.
- Government. Table 3 lists the hourly rate for all workers as \$45.93, including benefits.

Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*	Hourly Labor Costs (Incl. Benefits)	Total Dollar Value of Burden Hours
SHA/CCAA						
Application (Form 3-200-54)						
Individuals	5	5	3	15	\$34.15	\$512.25
CCAAs**	2	2	30	60	34.15	2,049.00
SHAs**	3	3	30	90	34.15	3,073.50
Private Sector	21	21	3	63	32.27	2,033.01
CCAAs**	16	16	30	480	32.27	15,489.60
SHAs**	5	5	30	150	32.27	4,840.50
Government	7	7	3	21	45.93	964.53
CCAAs**	5	5	30	150	45.93	6,889.50
SHAs**	2	2	30	60	45.93	2,755.80
Annual Report						
Individuals	10	10	8	80	34.15	2,732.00
Private Sector	40	40	8	320	32.27	10,326.40
Government	14	14	8	112	45.93	5,144.16
Notifications (Incidental Take)						
Individuals	1	1	1	1	34.15	34.15
Notifications (Change in Land Owner)						
Individuals	1	1	1	1	34.15	34.15
RECOVERY/INTERSTATE COMMERCE						
Application (Form 3-200-55)						
Individuals**	280	280	3	840	34.15	28,686.00
Private Sector**	280	280	3	840	32.27	27,106.80
Government**	80	80	3	240	45.93	11,023.20
Annual Report						
Individuals	700	700	3	2,100	34.15	71,715.00
Private Sector	748	748	3	2,244	32.27	72,413.88
Government	800	800	3	2,400	45.93	110,232.00
Request to Revise List of Authorized Individuals						
Private Sector***	30	30	0.5	15	32.27	484.05
Annual Report - Form 3-202-55b (Region 3 Bat Reporting Spreadsheet)						
Individuals	15	15	2.5	38	34.15	1,297.70
Private Sector	15	15	2.5	38	32.27	1,226.26
Government	12	12	2.5	30	45.93	1,377.90
Annual Report - Form 3-202-55c (Region 4 Bat Reporting Spreadsheet)						
Individuals**	5	5	2.5	13	34.15	443.95
Private Sector**	5	5	2.5	13	32.27	419.51
Government**	5	5	2.5	13	45.93	597.09
Annual Report - Form 3-202-55d (Region 5 Bat Reporting Spreadsheet)						
Individuals**	5	5	2.5	13	34.15	443.95
Private Sector**	5	5	2.5	13	32.27	419.51
Government**	5	5	2.5	13	45.93	597.09
Annual Report - Form 3-202-55e (Region 6 Bat Reporting Spreadsheet)						

Individuals**	5	5	2.5	13	34.15	443.95
Private Sector**	5	5	2.5	13	32.27	419.51
Government**	5	5	2.5	13	45.93	597.09
Annual Report - Form 3-202-55f Non-Releasable Sea Turtle Annual Report						
Private Sector**	2	2	0.5	1	32.27	32.27
Government**	5	5	0.5	3	45.93	137.79
Quarterly Report - Form 3-202-55g Sea Turtle Rehabilitation						
Private Sector**	20	20	0.5	10	32.27	322.70
Notification (Escape of Wildlife)						
Private Sector	1	1	1	1	32.27	32.27
HABITAT CONSERVATION PLAN						
Application (Form 3-200-56)						
Individuals	30	30	3	90	34.15	3,073.50
Private Sector	40	40	3	120	32.27	3,872.40
Government	5	5	3	15	45.93	688.95
Annual Report						
Individuals	360	360	10	3,600	34.15	122,940.00
Private Sector	380	380	10	3,800	32.27	122,626.00
Government	25	25	10	250	45.93	11,482.50
Plan						
Individuals**	10	10	2,080	20,800	34.15	710,320.00
Private Sector**	20	20	2,080	41,600	32.27	1,342,432.00
Government**	16	16	2,080	33,280	45.93	1,528,550.40
Total	4,051	4,051		114,075		\$4,233,333.77

* Rounded to match ROCIS

** New ICs reported with this submission which were in use w/o OMB approval

*** Note this IC was previously an aspect of the application form, but is now broken out as a separate IC.

Please see "Attachment A" for Detailed Summary of Changes to ICs Previously Reported (Total Respondents, Responses, Time Burden and \$ Value of Annual Burden Hours)

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory

compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The estimated annual nonhour burden cost is estimated to be \$59,550 for fees associated with permit applications and amendments. There is no fee associated with submission of reports. The estimated fees are based on the following using updated estimated responses from the burden table in question 12:

Requirement	Total Annual Responses	Amount	Total Estimated Fees
SHA/CCAA			
Application (Form 3-200-54)			
Individuals	5	\$50	\$250
Private Sector	21	50	1,050
RECOVERY/INTERSTATE COMMERCE			
Application (Form 3-200-55)			
Individuals	280	95	26,600
Private Sector	280	95	26,600
HABITAT CONSERVATION PLAN			
Application (Form 3-200-56)			
Individuals	30	75	2,250
Private Sector	40	75	3,000
Total			\$59,750

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate that the total cost to the Federal Government for processing and reviewing permit applications and reviewing reports as a result of this collection of information is \$2,582,230 (rounded). These costs are primarily for staff time to review and process applications, issue permits, and review reports. For each permit application, we will receive forms, process information; determine eligibility for a permit; and advise applicants of their success, and review reports associated with permits. Time requirements to process applications and reports vary greatly (from 0.5 to 230 hours) depending upon the species, species status, number of species associated with applications and reports and the complexity of the requested activity as well as its geographic scope.

Depending upon their geographic location, some employees are paid under a Federal salary table that includes locality pay. To determine average hourly rates, we used Office of Personnel Management Salary Table [2017-DC](#) as an average nationwide rate. We used Bureau of Labor Statistics news release [USDL-16-2255](#), December 8, 2016, Employer Costs for Employee Compensation—September 2016, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.57 to obtain a fully burdened rate.

Position/Grade	Hourly Rate	Hourly Rate Inc. Benefits (x 1.57)	Time Spent on Information Collection	Weighted Average \$/Hour*
Clerical GS-07/05	\$24.41	\$38.23	5%	\$ 1.91
Professional/Technical GS-11/05	36.12	56.71	84%	47.64
Management	51.48	80.82	11%	8.89

GS-13/05				
Weighted Average (\$/hr):				\$58.44

Requirement	Total Annual Responses	Average Time per Response	Total Federal Hours	Total Dollar Cost to Federal Government (\$58.44 x hours)
SHA/CCAA				
Application (Form 3-200-54)	66	140	9,240	\$539,985.60
Annual report	64	1	64	3,740.16
Notifications (Incidental Take) - individuals	1	1	1	58.44
Notifications (Change in Landowner) - individuals	1	1	1	58.44
RECOVERY/INTERSTATE COMMERCE				
Application (Form 3-200-55)	640	32	20,480	1,196,851.20
Annual report	2,248	1	2,248	131,373.12
Request to Revise List of Authorized Individuals (In Use W/O OMB Approval)	30	0.5	15	876.60
Annual Report - FWS Form 3-202-55b (Region 3 Bat Reporting Spreadsheet) (In Use W/O OMB Approval)	42	1	42	2,454.48
Annual Report - FWS Form 3-202-55c (Region 4 Bat Reporting Spreadsheet) (In Use W/O OMB Approval)	15	1	15	876.60
Annual Report - FWS Form 3-202-55d (Region 5 Bat Reporting Spreadsheet) (In Use W/O OMB Approval)	15	1	15	876.60
Annual Report - FWS Form 3-202-55e (Region 6 Bat Reporting Spreadsheet) (In Use W/O OMB Approval)	15	1	15	876.60
Annual Report - FWS Form 3-202-55f Non-Releasable Sea Turtle Annual Report (In Use W/O OMB Approval)	7	1	7	409.08
Quarterly Report - Form 3-202-55g Sea Turtle Rehabilitation (In Use W/O OMB Approval)	20	.25	5	292.20
Notification (Escape of Wildlife)	1	1	1	58.44
HABITAT CONSERVATION PLANS				
Application (Form 3-200-56)	75	8	600	35,064.00
Annual report	765	1	765	44,706.60
Plan (In Use W/O OMB Approval)	46	232	10,672	623,671.68
Total	4,051		44,186	\$2,582,229.84

Please see "Attachment B" for Detailed Summary of Changes to Government Cost Burden (since 2014 submission)

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

We are reporting an increase of 1,552 responses and 95,279 burden hours. The increased burden and changes to this collection are the result of:

- an increased number of submissions of applications, as well clarifications regarding the CCAA/SHA submission requirements associated with those respective applications, and the corresponding annual reports;
- improved tracking of the information regarding applications (for example, in the past, we may have inadvertently included federal agencies in our count of number of applications received);
- submission of new report forms for bats and sea turtles for approval by OMB;

- separation of burden for “Request to Revise List of Authorized Individuals” into a separate IC in order to simplify this process (this IC was previously included in the application burden), and
- separation of the burden for the submission of Habitat Conservation Plans into a separate IC (previously included with the application).

We are also reporting an increase to the annual nonhour burden of \$4,750 as the result of the increased number of applications received from local, state, and tribal governments.

We also updated the title of the collection to include Section 10.

Finally, we are reporting an increase in the cost to the Federal government of \$677,766 (rounded) (detailed in Attachment B below). The additional costs to the government is the result of additional burden hours required for FWS staff to review and process the increased number of responses, as well as the inclusion of the new ICs which were in use without approval from OMB. The new ICs are identified in the question 12 burden table.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable; we do not publish results of information collection.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.

ATTACHMENT "A"
OMB Control No. 1018-0094

Detailed Summary of Changes to ICs Previously Reported (Total Respondents, Responses, Time Burden and \$ Value of Annual Burden Hours)

Requirement	Number of Respondents (2014 Submission)	Number of Respondents (2017 Submission)	Total Number of Increased Responses	Number of Responses (2014 Submission)	Number of Responses (2017 Submission)	Total Number of Increased Responses	Total Burden Hours (2014 Submission)	Total Burden Hours (2017 Submission)	Total Change in Hours	\$ Value of Burden Hours (2014 Submission)	\$ Value of Burden Hours (2017 Submission)	Total Change in \$ Value of Burden Hours
SHA/CCAA												
Application (Form 3-200-54)												
Individuals	2	5	3	2	5	3	6	15	9	\$203.70	\$512.25	\$308.55
CCAAs (New - In Use W/O App)	0	2	2	0	2	2	0	60	60	0.00	2,049.00	2,049.00
SHAs (New - In Use W/O App)	0	3	3	0	3	3	0	90	90	0.00	3,073.50	3,073.50
Private Sector	4	21	17	4	21	17	12	63	51	575.88	2,033.01	1,457.13
CCAAs (New - In Use W/O App)	0	16	16	0	16	16	0	480	480	0.00	15,489.60	15,489.60
SHAs (New - In Use W/O App)	0	5	5	0	5	5	0	150	150	0.00	4,840.50	4,840.50
Government	5	7	2	5	7	2	15	21	6	609.60	964.53	354.93
CCAAs (New - In Use W/O App)	0	5	5	0	5	5	0	150	150	0.00	6,889.50	6,889.50
SHAs (New - In Use W/O App)	0	2	2	0	2	2	0	60	60	0.00	2,755.80	2,755.80
Annual Report												
Individuals	12	10	(2)	12	10	(2)	96	80	(16)	3,259.20	2,732.00	(527.20)
Private Sector	23	40	17	23	40	17	184	320	136	8,830.16	10,326.40	1,496.24
Government	29	14	(15)	29	14	(15)	232	112	(120)	9,428.48	5,144.16	(4,284.32)
Notifications (Incidental Take)												
Individuals	1	1	0	1	1	0	1	1	0	33.95	34.15	0.20
Notifications (Change in Land Owner)												
Individuals	1	1	0	1	1	0	1	1	0	33.95	34.15	0.20
RECOVERY/INTERSTATE COMMERCE												
Application (Form 3-200-55)												
Individuals	232	280	48	232	280	48	928	840	(88)	31,505.60	28,686.00	(2,819.60)
Private Sector	260	280	20	260	280	20	1,040	840	(200)	49,909.60	27,106.80	(22,802.80)
Government	87	80	(7)	87	80	(7)	348	240	(108)	14,142.72	11,023.20	(3,119.52)
Annual Report												
Individuals	414	700	286	414	700	286	3,312	2,100	(1,212)	112,442.40	71,715.00	(40,727.40)
Private Sector	465	748	283	465	748	283	3,720	2,244	(1,476)	178,522.80	72,413.88	(106,108.92)
Government	155	800	645	155	800	645	1,240	2,400	1,160	50,393.60	110,232.00	59,838.40
Request to Revise List of Authorized Individuals												
Private Sector (New - In Use W/O App)	0	30	30	0	30	30	0	15	15	0.00	484.05	484.05
Annual Report - Form 3-202-55b (Region 3 Bat Reporting Spreadsheet)												
Individuals	0	15	15	0	15	15	0	38	38	0.00	1,280.63	1,280.63
Private Sector	0	15	15	0	15	15	0	38	38	0.00	1,210.13	1,210.13
Government	0	12	12	0	12	12	0	30	30	0.00	1,377.90	1,377.90
Annual Report - Form 3-202-55c (Region 4 Bat Reporting Spreadsheet)												
Individuals (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	426.88	426.88
Private Sector (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	403.38	403.38
Government (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	574.13	574.13

Requirement	Number of Respondents (2014 Submission)	Number of Respondents (2017 Submission)	Total Number of Increased Responses	Number of Responses (2014 Submission)	Number of Responses (2017 Submission)	Total Number of Increased Responses	Total Burden Hours (2014 Submission)	Total Burden Hours (2017 Submission)	Total Change in Hours	\$ Value of Burden Hours (2014 Submission)	\$ Value of Burden Hours (2017 Submission)	Total Change in \$ Value of Burden Hours
Annual Report - Form 3-202-55d (Region 5 Bat Reporting Spreadsheet)												
Individuals (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	426.88	426.88
Private Sector (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	403.38	403.38
Government (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	574.13	574.13
Annual Report - Form 3-202-55e (Region 6 Bat Reporting Spreadsheet)												
Individuals (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	426.88	426.88
Private Sector (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	403.38	403.38
Government (New - In Use W/O App)	0	5	5	0	5	5	0	13	13	0.00	574.13	574.13
Annual Report - Form 3-202-55f Non-Releasable Sea Turtle Annual Report												
Private Sector (New - In Use W/O App)	0	2	2	0	2	2	0	1	1	0.00	32.27	32.27
Government (New - In Use W/O App)	0	5	5	0	5	5	0	3	3	0.00	114.83	114.83
Quarterly Report - Form 3-202-55g Sea Turtle Rehabilitation												
Private Sector (New - In Use W/O App)	0	20	20	0	20	20	0	10	10	0.00	322.70	322.70
Notification (Escape of Wildlife)												
Private Sector	1	1	0	1	1	0	1	1	0	47.99	32.27	(15.72)
HABITAT CONSERVATION PLAN												
Application (Form 3-200-56)												
Individuals	45	30	(15)	45	30	(15)	135	90	(45)	4,583.25	3,073.50	(1,509.75)
Private Sector	10	40	30	10	40	30	30	120	90	1,439.70	3,872.40	2,432.70
Government	5	5	0	5	5	0	15	15	0	609.60	688.95	79.35
Annual Report												
Individuals	354	360	6	354	360	6	3,540	3,600	60	120,183.00	122,940.00	2,757.00
Private Sector	373	380	7	373	380	7	3,730	3,800	70	179,002.70	122,626.00	(56,376.70)
Government	21	25	4	21	25	4	210	250	40	8,534.40	11,482.50	2,948.10
Plan												
Individuals (New - In Use W/O App)	0	10	10	0	10	10	0	20,800	20,800	0.00	710,320.00	710,320.00
Private Sector (New - In Use W/O App)	0	20	20	0	20	20	0	41,600	41,600	0.00	1,342,432.00	1,342,432.00
Government (New - In Use W/O App)	0	16	16	0	16	16	0	33,280	33,280	0.00	1,528,550.40	1,528,550.40
Totals:	2,499	4,051	1,552	2,499	4,051	1,552	18,796	114,075	95,279	\$774,292.28	\$4,233,109.07	\$3,458,816.79

ATTACHMENT "B"
OMB Control No. 1018-0094
Detailed Summary of Changes to Government Cost Burden (Since 2014 Submission)

Requirement	Number of Respondents (2014 Submission)	Number of Respondents (2017 Submission)	Total Number of Increased Responses	Total Federal Hours (2014 Submission)	Total Federal Hours (2017 Submission)	Change in Total Federal Hours	\$ Value of Burden Hours (2014 Submission)	\$ Value of Burden Hours (2017 Submission)	Total Change in \$ Value of Burden Hours
SHA/CCAA									
Application (Form 3-200-54)	11	66	55	1,540	9,240	7,700	80,757.60	539,985.60	459,228.00
Annual report	64	64	0	64	64	0	3,356.16	3,740.16	384.00
Notifications (Incidental Take)	1	1	0	1	1	0	52.44	58.44	6.00
Notifications (Change in Land Owner)	1	1	0	1	1	0	52.44	58.44	6.00
RECOVERY/INTERSTATE COMMERCE									
Application (Form 3-200-55)	579	640	61	18,528	20,480	1,952	971,608.32	1,196,851.20	225,242.88
Annual report	1,034	2,248	1,214	1,034	2,248	1,214	54,222.96	131,373.12	77,150.16
Request to Revise List of Authorized Individuals	0	30	30	0	15	15	0.00	876.60	876.60
Annual Report - Form 3-202-55b (Region 3 Bat Reporting Spreadsheet)	0	42	42	0	42	42	0.00	2,454.48	2,454.48
Annual Report - Form 3-202-55c (Region 4 Bat Reporting Spreadsheet)	0	15	15	0	15	15	0.00	876.60	876.60
Annual Report - Form 3-202-55d (Region 5 Bat Reporting Spreadsheet)	0	15	15	0	15	15	0.00	876.60	876.60
Annual Report - Form 3-202-55e (Region 6 Bat Reporting Spreadsheet)	0	15	15	0	15	15	0.00	876.60	876.60
Annual Report - Form 3-202-55f Non-Releasable Sea Turtle Annual Report	0	7	7	0	7	7	0.00	409.08	409.08
Quarterly Report - Form 3-202-55g Sea Turtle Rehabilitation	0	20	20	0	5	5	0.00	292.20	292.20
Notification (Escape of Wildlife)	1	1	0	1	1	0	52.44	58.44	6.00
HABITAT CONSERVATION PLAN									
Application (Form 3-200-56)	60	75	15	14,400	600	(13,800)	755,136.00	35,064.00	(720,072.00)
Annual Report	748	765	17	748	765	17	39,225.12	44,706.60	5,481.48
Plan	0	46	46	0	10,672	10,672	0.00	623,671.68	623,671.68
Total	2,499	4,051	1,552	36,317	44,186	7,869	\$1,904,463.48	\$2,582,229.84	\$677,766.36