**Supporting Statement A for**

**Paperwork Reduction Act Submission**

**Migratory Bird Surveys, 50 CFR 20.20**

**OMB Control Number 1018-0023**

**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.**

*Migratory Bird Harvest Information Program*: Under 50 CFR 20.20, migratory bird hunters must register for the Migratory Bird Harvest Information Program (HIP) in each state in which he or she hunts each year. State natural resource agencies are required to send names and addresses of all migratory bird hunters to the USFWS. We send surveys to selected hunters to estimate the magnitude and composition of migratory bird species harvest.

*Migratory Bird Hunter Survey and Parts Collection Surveys*: Under the Migratory Bird Treaty Act (16 U.S.C. 703-712), the Department of the Interior is designated as a key agency responsible for the wise management of migratory bird populations frequenting the U.S. and for the setting of hunting regulations that allow appropriate harvests of magnitudes that will allow for the populations' well-being. These responsibilities dictate the gathering of accurate data on various characteristics of migratory bird harvests of a temporal and geographic nature. The Fish and Wildlife Act of 1956 (16 U.S.C. 742a-742j) authorizes collection of such information as is necessary to determine the status of wildlife resources, which is necessary to develop appropriate hunting regulations. Information required for effectively governing harvests of migratory birds includes not only knowledge of the harvest's magnitude but also information of the species, age, and sex composition within that harvest, including the geographic and chronologic distribution of these components as they relate to various hunting regulations.

*Sandhill Crane Harvest Survey*: The cooperative management guidelines for mid-continent sandhill cranes (included are three currently recognized subspecies: lesser, Grus canadensis canadensis; Canadian, G. c. rowani; and greater, G. c. tabida) are aimed at providing optimum diverse recreational opportunity consistent with the welfare of the species and within the provisions of international treaties and socio-economic constraints. Beginning in 1960 and continuing to date, hunting seasons have been allowed for sandhill cranes in Alaska and all or part of eight Midwestern states (Colorado, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming) during specified time periods. In addition, a sandhill crane hunting season has been allowed in Kansas since 1993 and in northwest Minnesota since 2010. Prior to the initiation of the sandhill crane harvest questionnaire in 1975, little information was available on the number of individuals who annually hunt sandhill cranes or the number of cranes harvested. This lack of information was a major void in management of the species. Annual crane hunter activity and harvest information were readily available for Canada through uniform nationwide surveys conducted by the Canadian Federal Government. Lack of comparable information from the United States precluded ascertaining the total annual hunter harvest from this migratory bird resource shared by the two countries.

**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.**

Data are collected via various survey forms that are specific to the type of information being collected (e.g., mail survey form for Migratory Bird Hunter Survey, envelope for Parts Collection Survey). Data are collected by state natural resource agencies (Migratory Bird Harvest Information Program) and the U.S. Fish and Wildlife Service (Migratory Bird Hunter Survey, Parts Collection Survey, and Sandhill Crane Harvest Survey). All data are collected each year, because there is a reasonable expectation of significant changes in key statistics between collections. This is because: (1) hunters change addresses over time; and (2) hunter success is dependent upon bird populations and migration chronology which can vary from year to year depending on weather and habitat conditions. Information collected is used by both Federal and state authorities to monitor the effects of various hunting regulations on the harvest of individual migratory bird species. The information has been particularly useful in evaluating the effects of changes in daily bag limits, hunting season length, and hunting season dates on harvest. Information obtained also gives the Service a great deal of insight into the status of the many species involved.

Annual reports are made available on the [Division of Migratory Bird Management’s](https://www.fws.gov/birds/surveys-and-data/reports-and-publications/hunting-activity-and-harvest.php) (DMBM) website. Promulgation of annual hunting regulations by the Service relies on a well-defined process of monitoring data collection and scientific assessment. At key points during that process, Flyway technical committees, Flyway Councils (state agencies), consultants, and the public (and in some instances international regulatory agencies) review and provide valuable input on data collection and technical assessments. All assessments pertaining to the setting of annual harvest regulations are deemed “highly influential,” however they are exempted from strict application of IQA peer-review guidelines due to the compressed time schedule associated with the regulatory process. Therefore, peer-review plans for technical assessments which influence annual hunting regulations decisions are not posted on the DMBM webpage. The DMBM has a long history of subjecting applicable portions of such technical assessments to formal peer-review through submission to scientific journals, or other means, in addition to the review received as part of the annual regulatory process. Information from each survey contributes towards a national program to monitor the harvest of all migratory game bird species in the U.S.

The **Migratory Bird Harvest Information Program (MBHIP)** was developed by state natural resource agencies and the U.S. Fish and Wildlife Service to allow each state to provide lists of all migratory bird hunters licensed by the state on an annual basis. Each migratory bird hunter is required to register in each state in which he/she hunts by providing his/her name, address, and date of birth, and other ancillary information (described below). Some states also collect the email address of each hunter. We request the date of birth in order to identify duplicate records and assess the quality of the data provided. The state includes the date the hunter registered with the record. We also accept email addresses in the HIP registration from states that already collect them, to assist us in implementing electronic surveys in the future.

This ancillary information allows the U.S. Fish and Wildlife Service to stratify the sample, investigate sources of bias, calculate bias correction factors, and identify duplicate records. Each state collects the information in a way that is most appropriate for that state, but all states ask some variation of the following questions that are appropriate in that state:

1. Will you hunt migratory birds this year?
2. How many ducks did you bag last year?
3. How many geese did you bag last year?
4. How many doves did you bag last year?
5. How many woodcock did you bag last year?
6. Did you hunt coots or snipe last year?
7. Did you hunt rails or gallinules last year?
8. Will you hunt sandhill cranes this year?
9. Will you hunt band-tailed pigeons this year?
10. Will you hunt brant this year?
11. Did you hunt sea ducks last year?

Because the distributions of these birds vary across the country and hunters vary in terms of what species they choose to hunt, the answers to these questions allow us to increase the efficiency of sampling by allowing us to concentrate sampling effort on the most appropriate hunters in each state.

The **Parts Collection Surveys (PCS)** are used to estimate the species, sex, and age composition of the harvest, and the geographic and temporal distribution of the harvest. Randomly selected successful hunters who responded to the Migratory Bird Hunter Survey the previous year are asked to complete and return a letter (Form 3-165B [waterfowl], Form 3-165C [woodcock, band-tailed pigeon, rail, gallinule], or Form 3-165D [mourning dove]) if they are willing to participate in the Parts Collection Surveys. Those who answer “Yes” are also asked to report approximately how many birds they harvest in an average season. We need this information to determine how many of Forms 3-165, 3-165A, or 3-165E to send each participant at the beginning of the hunting season.

Respondents to Forms 3-165B, 3-165C, and 3-165D are provided postage-paid envelopes before the hunting season and asked to send in a wing or the tail feathers from each duck or goose (Form 3-165) they harvest, a wing from each woodcock, band-tailed pigeon, rail, or gallinule (Form 3-165A) they harvest, or a wing from each dove (Form 3-165E) they harvest. Dove managers are interested in estimates of local recruitment, so dove wings are requested from only the first 2 hunts during the first week of the dove season, to limit the sample to local birds. The wings and tail feathers are used to identify the species, age, and sex of the harvested sample.

Respondents are also asked to report on the envelope:

* Hunter name, to allow identification of the hunter if the barcode sticker is damaged or destroyed;
* Location (state, county and nearest town) the bird was harvested, because this enables us to estimate the geographic distribution of the harvest of each species (nearest town enables us to identify county if county was unknown);
* Month and day the bird was harvested, because this provides information on the temporal distribution of the harvest of each species that enables us to evaluate the effects of hunting season dates on species-specific harvest;
* The band number of any leg-banded bird, because this enables us to estimate band reporting rates (Form 3-165 only, because only waterfowl are banded in significant numbers).

The **Migratory Bird Hunter Survey (MBHS)** is based on the sample frame provided by the Migratory Bird Harvest Information Program. Randomly selected migratory bird hunters are sent one of the following forms and asked to report their harvest of those species: a waterfowl questionnaire (Form 3-2056J), a dove and band-tailed pigeon questionnaire (Form 3-2056K), a woodcock questionnaire (Form 3-2056L), or a snipe, rail, gallinule, and coot questionnaire (Form 3-2056M). The resulting estimates of harvest per hunter are combined with the complete list of migratory bird hunters, which serves as the expansion factor to provide estimates of the total harvest of those species or species groups.

On survey Form 3-2056J-M, we ask hunters to identify the following information:

* Whether or not they hunted (waterfowl [Form 3-2056J]; doves and/or band-tailed pigeons [Form 3-2056K]; woodcock [Form 3-2056L]; or snipe, rails, gallinules and/or coots [Form 3-2056M]) this season. We need this information to estimate the number of active hunters of that species or species group. If they did hunt those species, we ask for:
  + Month and day of hunt, because this provides information on the temporal distribution of the harvest that enables us to evaluate the effects of hunting season dates on harvest;
  + County and state of hunt, because this enables us to estimate the geographic distribution of the harvest;
  + Number of birds bagged, because this provides us with information on daily hunting success that enables us to evaluate the impacts of daily bag limits on harvest; and
  + Season totals (days hunted, birds bagged, and birds knocked down but not retrieved), because this allows people who do not record their daily hunts to still provide us with data that enable us to estimate total days of hunting, total harvest, and mortality due to crippling loss.

The **Sandhill Crane Harvest Survey** is used to annually estimate the magnitude, geographical distribution, and temporal distribution of the sandhill crane harvest in Alaska, Colorado, Kansas, Minnesota, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming. Although we do not currently survey crane hunters in Kentucky and Tennessee, the recent additions of crane seasons in these states will require us to sample from these registered hunters in our survey in the future. It has also been possible for us to estimate the portion of the sandhill crane’s total population that is taken during harvest. This information has been particularly useful in determining the effects on harvests of daily bag limits and changes in hunting dates and the areas (counties) of states open to hunting. Based on information from the U.S. and Canadian surveys, hunting regulations can be adjusted as needed to optimize harvest at levels that provide a maximum of hunting recreation while keeping populations at desired levels.

On survey Form 3-2056N, we ask hunters to identify the following information:

* Whether or not they hunted sandhill cranes this season. We need this information to estimate the number of active crane hunters.
* If they did hunt cranes, we ask for:
  + Month and day of hunt, because this provides information on the temporal distribution of the harvest that enables us to evaluate the effects of hunting season dates on harvest;
  + County and state of hunt, because this enables us to estimate the geographic distribution of the harvest;
  + Number of birds bagged, because this provides us with information on daily hunting success that enables us to evaluate the impacts of daily bag limits on harvest; and
  + Season totals (days hunted, birds bagged, and birds knocked down but not retrieved), because this allows people who do not record their daily hunts to still provide us with data that enable us to estimate total days of hunting, total harvest, and mortality due to crippling loss.

**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.**

Of the total number of burden hours, most (126,667 hours) are responses to the Migratory Bird Harvest Information Program. These data are collected by the state wildlife agencies, who in turn forward the responses (hunters’ names, addresses, date of birth, and in some cases, email addresses) to the Service for use in national harvest surveys. On average, we receive the name and addresses of about 3,800,000 migratory bird hunters. Approximately 3,600,000 were collected electronically by the states in 2008, either online (through electronic licensing systems) or by telephone. The remaining records were collected using paper forms. The proportion of electronic responses increases each year as more states implement electronic data collection methods. About 181,400 responses are from randomly selected migratory bird hunters who are asked to voluntarily participate in a season-long survey (85,000 responses) or to send in migratory bird wing/feather parts in envelopes provided by the Service (96,400 responses). We have to print paper survey forms for our initial contact with hunters to ensure a representative sample, because not all hunters have electronic mail addresses.

We are working with the USFWS’s Information Resources and Technology Management (IRTM) to develop an online survey response platform to allow hunters to respond to our season-long survey over the internet, as an alternative to a paper form. This change to our survey platform will not be operational until the 2019-2020 harvest season at the earliest. We do not yet know how the survey burden will change with implementation of this online form, but we expect the burden to decrease. We will submit a new Information Collection Request as soon as we have developed the online form and can better estimate the burden of collection.

Finally, we have implemented 2 electronic methods for hunters to communicate with us: an email address (MigratoryBirdHarvestSurveys@fws.gov) and a website that allows hunters to request more survey forms or request more survey forms or wing envelopes (<https://migbirdapps.fws.gov/hipweb/>).

The envelopes (Forms 3-165, 3-165A, 3-165E) for the migratory bird wing/feather parts are large and would not print out on most standard printers. Furthermore, we could not guarantee envelopes printed on personal printers would comply with U.S. Postal Service regulations, thus we do not anticipate putting those envelopes online. The burden currently placed on cooperators and the cost to the Federal government is thought to be at a minimum level consistent with the information required.

We do not print out paper copies of our reports for distribution. Annual reports are made available on the [Division of Migratory Bird Management’s](https://www.fws.gov/birds/surveys-and-data/reports-and-publications/hunting-activity-and-harvest.php) (DMBM) website.

**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.**

Many state wildlife agencies collect some information on migratory bird harvest within their state, and a number of state hunter surveys have been examined. State information is generally collected secondarily in harvest surveys of game other than migratory birds and is not adequate for Federal regulatory responsibilities primarily because: (1) surveys to estimate harvest of migratory birds and hunter activity are not conducted in every state, and (2) survey methodologies vary among those states who do conduct harvest surveys. Information from state surveys is often insufficiently detailed or imprecise, or has weaknesses in sampling design that can result in bias (e.g., failing to contact non-respondents; having no verification of species identification). Furthermore, many state survey results are not available in time to be useful for promulgating regulations. Some states eliminated migratory birds from their harvest surveys when we began conducting the Migratory Bird Hunter Survey; thus, duplication of effort between state and Federal surveys has been reduced since implementation of the Migratory Bird Harvest Information Program.

Within the USFWS, we do not select a hunter for more than one survey each year. We have implemented computer algorithms to identify exact duplicate Migratory Bird Harvest Information Program registrations across all data files. We eliminate these duplicate records prior to drawing our sample, thus improving the efficiency of our survey while avoiding asking a single hunter to fill out more than 1 survey. We are also investigating the cost-effectiveness of implementing address hygiene software to identify probable duplicates across all data files to further decrease the probability that a hunter will be selected for more than one survey each year.

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

This collection does not significantly impact small entities. This information is only collected from individual migratory bird hunters and state agencies.

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

If this information were not collected, the Service's ability to promulgate regulations allowing controlled hunting of migratory birds would be greatly weakened. Agencies participating in determining appropriate hunting regulations, and making use of survey results, include the Department of the Interior, the Canadian Wildlife Service, state conservation agencies, and various private conservation organizations. Additionally, researchers often use these data to investigate biological phenomena such as range expansion, migration chronology, and species presence/absence.

The Service would not be able to estimate how many migratory birds were being taken by hunters annually, or assess our ability to manage populations through harvest regulation. The continued health of migratory bird populations demands that harvests be commensurate with population size and status. If these surveys were not conducted, the lack of accurate assessment of migratory bird harvests would dictate restrictive hunting regulations, which could result in lost hunting recreation. Loss of hunting opportunity due to lack of monitoring would not be acceptable to the hunting public, state natural resource agencies (many of whom rely on revenue from hunting licenses for funding and USFWS harvest surveys to set state-level hunting regulations), and some Non-Governmental Organizations (NGOs; e.g., Ducks Unlimited). Allowing hunting opportunity without monitoring would not be acceptable to conservationists, much of the hunting public, non-hunting public, and some NGOs (e.g., Humane Society).

Surveys need to be conducted annually because the number of birds harvested can change substantially between years. Harvests fluctuate with the size of the hunted and hunter population, as well as climatic conditions such as drought, flood, extreme warm or cold temperatures, and annual fluctuations in species distribution. Annual harvest estimates are required to allow us to adequately measure these changes in harvest. Furthermore, states and some NGOs are interested in creating increased hunting opportunity for hunters and are experimenting with hunting regulations (e.g., different license types, special seasons, season length, bag limit, opening and closing dates, zoning). The utility of these approaches needs to be monitored annually to determine efficacy.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**\* requiring respondents to report information to the agency more often than quarterly;**

**\* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

**\* requiring respondents to submit more than an original and two copies of any document;**

**\* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

**\* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

**\* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

**\* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

**\* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

**8. 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 February 24, 2017, we published in the Federal Register (82 FR 11603) a notice soliciting public comment on this information collection for sixty (60) days, ending April 25, 2017. We received the following five (5) comments in response to that notice:

***Comment 1: Received February 25,* 2016, from B Ker via email/mail/fax:**

“it is time to shut down the fakery in teh bird counts that are used as fake props to propagandize the murder of these bird species. none of these counts are accurate. they are paid for frmo general taxpayers and then the psychotic huntes get to use those fake numbers paid for by people who hate hunting and murder of birds. we are sick of the scams going on in this area.

these psycho huntes with their need to kill little tiny birds, birds just trying to stay alive in this inhumane world, this is a disaster - an environmental disaster. we all need those birds in this world. we dont need the human psychotic scum with guns with their psychotic need to kil. it is disgusting tha this agency servces as the pump  for these psychotic bird murderers.

the migratory bird count is lying and fakery from the get go. all teh way it is propaganda to try to justify bird killing. there is no dignity in this disgusting agency that promotes bird killing.

those birds help our environment. they plant seeds so that trees grow. this agency is evil, despotic, lies to the public and is full of fakery. this agency is the swamp.

its time to shut down this murder of all bird species. people who revere and want to protect wildlife certainly far far exceed the psychotic gun wielders. why dont we have a voice anywhere in this agency. we are overwhelming in numbers. wildlife watchers are 88% of all americans. this comment is for the public record. hunters represent about l% of the us public. why do we have NO VOICE IN THIS AGENCY. YOU ARE PIMPS FOR GUN MFRS. THIS COMMENT IS FOR THE PUBLIC RECORD. PLEASE RECEIPT. B KER”

***Service Response to Comment 1*:** No response required.

***Comment 2: Received* \_April 7, 2017, from the Atlantic Flyway Council via email:**

The Atlantic Flyway Council provided comments in response to the 4 topics listed below (see “Service Response” following each separate comment from the Atlantic Flyway Council).

***Comment 2A:*** *Whether or not the collection of information is necessary, including whether or not the information will have practical utility*.

The Atlantic Flyway commented that the surveys are absolutely critical to the management of migratory birds and maintaining hunting seasons, and that without reliable data on harvest parameters derived from these surveys, our ability to make decisions could result in less than optimal levels of migratory bird populations and decrease in hunting opportunity. They commented that the surveys provide substantial evidence that game bird species are wisely managed, thus preventing meaningful legal challenges against migratory game bird hunting seasons.

***Service Response to Comment 2A*:** No response required.

***Comment 2B:*** *The accuracy of our estimate of the burden for this collection of information.*

The Atlantic Flyway stated that, while the methodology used to estimate the time burden was not clear, the estimates did not appear to be unreasonable, and that they did not believe the surveys caused a significant burden on respondents. Further, they stated that the necessity to collect the information outweighed the time burden of the survey.

***Service Response to Comment 2B*:** No response required.

***Comment 2C:*** *Ways to enhance the quality, utility, and clarity of the information to be collected.*

The Atlantic Flyway Council stated that they believed these surveys are conducted in a reliable and efficient fashion and employ a methodology that provides accurate and reliable data. They also stated that the use of electronic surveys may allow for an increase in sample size which might increase the reliability and accuracy of the survey and reduce overall costs, as well as reduce the burden on respondents. They encouraged examination of those techniques and were anxious to work with the Service to improve or change the surveys.

***Service Response to Comment 2C:*** We are working with the USFWS’s Information Resources and Technology Management (IRTM) to develop an online survey response platform to allow hunters to respond to the diary survey over the internet, as an alternative to a paper form. This change to our survey platform will not be implemented until the 2018-2019 harvest season at the earliest. We intend to involve the flyways and other stakeholders in the development of this online form to make sure the implementation is smooth and does not increase the burden on survey respondents or impact the integrity of the data we collect.

***Comment 2D:*** *Ways to minimize the burden of the collection of information on respondents:*

The Atlantic Flyway reiterated their comment that they did not believe the surveys caused a significant burden on respondents, but encouraged examination of methods such as electronic surveys that could reduce the burden.

***Service Response to Comment 2D:*** see response to comment above.

***Comment 3: Received* \_April 17, 2017, from the New Mexico Department of Game and Fish (hereafter NMDGF) via email:**

The New Mexico Department of Game and Fish provided comments in response to the 4 topics listed below (see Service Response following each comment).

***Comment 3A:*** *Regarding whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary:*

The NMDGF stated their full support of the continuation of the Migratory Bird Harvest Information Program, the Migratory Bird Hunter Survey, Parts Collection Survey and the Sandhill Crane Survey. NMDGF stated that the estimates of hunters and harvests from these surveys allow for informed decision making in setting harvest regulations and avoiding overharvest of migratory game birds that could lead to decreased population numbers as well as decrease in hunting opportunity and local economic expenditures by hunters within NM.

***Service Response to Comment 3A*:** No response required.

***Comment 3B:*** *Regarding the accuracy of our estimate of burden for this collection of information:*

The NMDGF noted that the surveys are voluntary, and does not believe they cause significant burden, and that our estimate of the burden is accurate.

***Service Response to Comment 3B*:** No response required.

***Comment 3C:*** *Regarding ways to enhance the quality, utility, and clarity of the information to be collected:*

The NMDGF believes that the surveys are conducted appropriately, allowing for accurate and usable estimates of the number of hunters and harvests, and allowing New Mexico to evaluate decisions regarding hunting season selections within the Federal hunting frameworks.

***Service Response to Comment 3C*:** No response required.

***Comment 3D****: Regarding ways to minimize the burden of the collection of information on respondents:*

The NMDGF stated that, while they do not believe the surveys cause a significant burden, they encourage critical examination of the current methods to reduce burden wherever possible. However, they noted that any changes to the methodology would require appropriate funding and resources for sampling design and development and proper implementation of changes to ensure reliability and usability of the resulting data.

***Service Response to Comment 3D*:** In the next several years, we intend to undertake a critical review of the sampling design of this survey, as part of an effort to modernize our overall data management processes. As stated previously in this document, we will also be moving to an online harvest diary form which should reduce the burden on respondents by making it easier to fill out and submit the form. We fully intend to involve state agency partners in this modification to the survey.

***Comment 4: Received April 24, 2017*, from the Pacific Flyway Council (received via email)**

The Pacific Flyway Council provided comments in response to the 4 topics listed below (see Service Response following each comment).

***Comment 4A:*** *Whether or not the collection of information is necessary, including whether or not the information will have practical utility:*

The Pacific Flyway Council stated that the data obtained from these surveys are absolutely critical to the proper management of migratory game birds, and that, without this information, their ability to make appropriate decisions could result in less than optimal migratory bird populations and a decrease in hunting recreation. They also stated that the surveys provide substantial evidence regarding wise management of migratory birds that prevent meaningful legal challenges against migratory bird hunting seasons.

***Service Response to Comment 4A*:** No response required.

***Comment 4B:*** *Regarding the accuracy of our estimate of burden for this collection of information:*

The Pacific Flyway Council believed the estimates did not appear to be unreasonable, and that the surveys do not cause a significant burden on respondents. Further, they stated that the necessity to collect the information far outweighs the time and effort to collect it.

***Service Response to Comment 4B*:** No response required.

***Comment 4C:*** *Regarding ways to enhance the quality, utility, and clarity of the information to be collected:*

The Pacific Flyway Council stated they believed the surveys are conducted in an appropriate fashion, but stated that there could be improvements in the approaches and techniques used to increase efficiency and reliability or use new and changing technologies, specifically, that the use of electronic surveys might allow for increase in sample size and increased reliability and accuracy. The flyway council encouraged examination of these techniques and expressed willingness to work with the Service to improve or change the surveys, but noted that these explorations would require appropriate funding for development and implementation.

***Service Response to Comment 4C:***As stated above, in the next several years, we intend to undertake a critical review of the sampling design of this survey, as part of an effort to modernize our overall data management processes. We will also be moving to an online harvest diary form which should reduce the burden on respondents by making it easier to fill out and submit the form. We fully intend to involve flyway partners in this modification to the survey, which should allow us to increase sample sizes where needed while maintaining reliability and accuracy of the survey.

***Comment 4D:*** *Ways to minimize the burden of the collection of information on respondents:*

The Pacific Flyway Council reiterated that they did not believe the surveys caused a significant burden on respondents, but suggested the use of electronic surveys as a possible way to reduce the burden on respondents.

***Service Response to Comment 4D*:** see above.

***Comment 5: Received April 27, 2017*, from the Central Flyway Council (received via email)**

The Central Flyway Council provided comments in response to the 4 topics listed below (see Service Response following each comment). The Council stated that they fully support continuation of the harvest surveys in their current protocol and methodology.

***Comment 5A:*** *Whether or not the collection of information is necessary, including whether or not the information will have practical utility:*

The Central Flyway Council stated that the data obtained from these surveys are critical to the scientific-based management of migratory game birds under the Migratory Bird Treaty Act, and that the four flyway councils (Atlantic, Mississippi, Central and Pacific) make informed decisions in setting and adjusting harvest regulations with this information. Without this information collection, the Flyway feels that less than optimal hunting regulations could be selected, resulting in a decrease in hunting recreation and local economic expenditures. They also stated that in the Central Flyway, 140,000 goose hunters, 200,000 duck hunters, and 370,000 dove hunters spend approximately 3 million days afield thanks in part to the information collected in these surveys and other Service migratory bird monitoring programs.

***Service Response to Comment 5A*:** No response required.

***Comment 5B:*** *Regarding the accuracy of our estimate of burden for this collection of information:*

The Central Flyway Council believed the accuracy of the estimates is appropriate based on their experience with migratory bird hunters across 10 states, and that the surveys do not cause a significant burden on respondents.

***Service Response to Comment 5B*:** No response required.

***Comment 5C:*** *Ways to enhance the quality, utility, and clarity of the information to be collected:*

The Central Flyway Council stated they believed the surveys are conducted in an appropriate fashion that provides accurate and precise estimates of migratory bird hunter and harvest. They also stated that until alternative methodologies have been developed and vetted, mailing surveys is the sole method for obtaining high quality information with migratory bird surveys. They noted that this information collection allows individual States to evaluate human dimension decisions (e.g., timing of seasons, boundaries of hunting zones) related to the States’ hunting season selections within the Federal framework for migratory bird seasons.

***Service Response to Comment 5C*:** No response required.

***Comment 5D:*** *Ways to minimize the burden of the collection of information on respondents:*

The Central Flyway Council reiterated that they did not believe the surveys caused a significant burden on respondents, but encouraged the examination of methods to reduce the burden of the surveys on respondents, and stated they were willing to work with the Service on any improvements or changes in the future. They further noted that these changes would require appropriate funding for their development and implementation, and need to ensure comparability with previous methods.

***Service Response to Comment 5D*:** As stated above, in the next several years, we intend to undertake a critical review of the sampling design of this survey, as part of an effort to modernize our overall data management processes. We will also be moving to an online harvest diary form which should reduce the burden on respondents by making it easier to fill out and submit the form. We fully intend to involve flyway partners in this modification to the survey, which should allow us to increase sample sizes where needed while maintaining reliability and accuracy of the survey.

In addition to the Federal Register Notice, we consulted with nine (9) individual hunters (location and participation listed in the table below) who are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

|  |  |  |
| --- | --- | --- |
| Hunter 1  Bismarck, ND  Participant in MBHIP, PCS | Hunter 2  Marysville, CA  Participant in MBHIP, MBHS | Hunter 3  Hartselle, AL  Participant in MBHIP, MBHS |
| Hunter 4  Payneville, KY  Participant in MBHIP, MBHS, PCS | Hunter 5  Seneca, SC  Participant in MBHIP, MBHS | Hunter 6  Napa, CA  Participant in MBHIP, MBHS |
| Hunter 7  Wilmont, NH  Participant in MBHIP, MBHS | Hunter 8  Crossville, TN  Participant in MBHIP, MBHS | Hunter 9  San Carlos, CA  Participant in MBHIP, MBHS |

“***Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”***

*Comments:* All hunters felt the collection of information was necessary for sound waterfowl management.

*FWS Response/Action Taken:* No response required.

***“The accuracy of our estimate of the burden for this collection of information”***

*Comments:* 4/9 hunters said the estimate was accurate; 2/9 said it probably doesn’t take that long; 2/9 hunters said it took 5-10 minutes, and 1/9 hunter said that, although he was not the average hunter, it could take him up to a half hour if he was logging a lot of hunts.

*FWS Response/Action Taken:* The amount of time it takes a hunter to fill out a form is highly variable, depending upon how often the hunter hunts and how many birds he harvests. Based on our experience administering this collection, we feel our burden estimates represent the average completion time of most respondents.

***“Ways to enhance the quality, utility, and clarity of the information to be collected”***

*Comments:* Two out of 9 hunters suggested that reporting the number of birds “downed but not lost” would be more useful if the hunter specified whether or not a dog was used in the hunt to retrieve birds, and that hunters might not keep a record of those birds. 1/9 hunter suggested that we make sure that survey respondents have the forms that they need in time for data collection and submission. Six out of 9 hunters did not suggest any ways to enhance the information to be collected.

*FWS Response/Action Taken:* We understand that the estimate of the number of birds downed but not lost may differ depending upon the type of hunt, whether or not a dog was used to retrieve birds, and many other factors that we do not record in this survey. Still, the average number of birds downed but not lost during a hunt is a useful index that provides us with information about whether crippling loss, a correction factor used to estimate total overall harvest, is changing from year to year, or among species. We do not feel that the information gained by asking hunters if they used a dog would be able to be easily used to better estimate crippling loss, and thus do not believe the additional burden of collecting this information is justified.

We send out PCS envelopes to hunters 2 weeks in advance of the surveys so that they are able to respond throughout the season as they hunt. For hunters sampled during the initial pre-season sample we send out diary forms 2 weeks prior to the beginning of the season. For hunters who register during the hunting season, we send out forms between 1-3 weeks after we receive the hunter information because we only receive newly registered hunter names every 2 weeks from each state, and it takes on average a week to sample from and organize shipping materials to send to new hunters. However, hunters will often require more envelopes than we initially send (the initial number of envelopes we send to each hunter is equal to the number of parts that they submitted in the previous year, or if they have not participated previously, we send them), and some require additional survey forms. We make every attempt to send these additional forms and envelopes out as soon as we receive the request, and mail envelopes and additional forms 2-3 times per week during the hunting season. We include a postcard with information on how to order additional envelopes for the PCS survey, and provide the same information on our diary forms. In addition, for the 2017 hunting season we are updating our materials request website (<https://migbirdapps.fws.gov/hipweb>) to make it easier for hunters to request additional envelopes or forms online.

***“Ways to minimize the burden of the collection of information on respondents”***

*Comments:* Five out of 9 hunters offered no suggestions to minimize the burden. Two out of 9 hunters suggested we put the survey online, so that people might be more willing to complete the survey; one suggested that we provide an opportunity to call in the survey, similar to a game check phone number offered by some states’ wildlife agencies. One out of 9 hunters suggested a tally system with the different species of ducks listed so that hunters could check them off rather than having to remember them. One out of 9 hunters suggested we reduce the sample needed for goose parts (tails) by having hunters indicate the species they harvested using pictures in a diary-type survey, rather than having them submit tail feathers, although a sub-sample of parts would still be needed for collecting information on productivity (i.e., the ratio of the number of young in the harvest to the number of adults).

*FWS Response/Action Taken:* As stated previously, we are working with the USFWS’s Information Resources and Technology Management (IRTM) program to develop an online survey response platform to allow hunters to respond to the diary survey over the internet, as an alternative to a paper form. This change to our survey platform will not be implemented until the 2018-2019 harvest season at the earliest. We do not yet know how the survey burden will change with implementation of this online form, but we expect the burden to decrease, both due to the lower cost of data collection using an online form rather than mailed paper forms, and the shorter time period for the hunter to complete the survey due to increased ease of use.

We do not provide a tally system on our diary forms that lists each species because we only ask hunters to report the number of birds they harvest, not the species of each bird. Due to the difficulty of identifying similar species, and the age and sex within species, instead of asking hunters to identify birds, we use the examination of wings submitted in the Parts Collection Survey to determine the proportion of each species, and age and sex class for most species, in the total harvest.

We currently rely on the examination of goose tails to determine the species and age composition of the goose harvest. Given the relatively few goose species in North America, and their difference in appearance, it might be possible for hunters to identify the geese they harvest to species using photographs or pictures on a survey form. This change to our survey would involve a redesign our survey forms, and would also require us to conduct an analysis to determine the impact of species misidentification on the species composition of the harvest. We believe that this suggestion has merit, and will be considered along with other potential changes to our survey design while we are developing our online survey platform which will be implemented after the 2018-2019 hunting season.

In addition to soliciting public comments through the Federal Register notice and targeted outreach described above, meetings and workshops are held several times annually between the Service and state personnel responsible for management of migratory birds, at which time problems and needs related to harvest surveys are discussed and acted upon. The Service has representatives to each of four flyways (groups of states - Atlantic Flyway, Mississippi Flyway, Central Flyway, and Pacific Flyway) who coordinate migratory bird management with state agency biologists.

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

No payments or gifts are provided to respondents. As incentive, we provide participants in the Parts Collection Survey with a report at the end of the hunting season. This report lists the species, age, and sex of each wing that hunter submitted during the past hunting season.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Each hunter contacted receives an assurance that the survey is conducted in accordance with the Privacy Act of 1974 (5 USC 552a). Hunters are not asked to write their names on the questionnaires, and are assured that their names or identifications will not be associated with their questionnaires. A System of Records Notice (SORN), “Migratory Bird Population and Harvest Surveys – Interior, FWS-26”, was published in 46 FR 18378. This SORN is being updated in collaboration with our Privacy Act Officer. We will notify OMB with the correct citation when the updated SORN is published.

We contract out the printing of some of the survey materials. Contracting is completed through the Government Printing Office (GPO) and all contractors must meet Privacy Act guidelines.

**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.**

There are no 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 that we will receive 190,206 responses from 96,249 respondents totaling 141,076 annual burden hours for this information collection with an estimated total dollar value of the annual burden hours is approximately $6,304,187 (rounded) (See Table 12.1). We used the of Bureau of Labor Statistics (BLS) News Release [USDL-17-0321](https://www.bls.gov/news.release/pdf/ecec.pdf), March 17, 2017, Employer Costs for Employee Compensation—December 2016, to calculate the total annual burden.

* Individuals. Table 1 lists the hourly rate for all workers $34.90, including benefits.
* Government. Table 3 lists the hourly rate for all workers as $47.85, including benefits.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Collection Type/**  **Form Number** | **Number of Respondents** | **Average Number of Responses Each** | **Number of Annual Responses** | **Average Time per Response** | **Total Annual Burden Hours\*** | **Cost per Hour (Incl. Benefits)** | **Total Annual Dollar Value of Burden Hours** |
| **Migratory Bird Harvest Information Program (State Governments)** | | | | | | | |
|  | 49 | 16 | 784 | 157 hours | 123,088 | $ 47.85 | $ 5,889,760.80 |
| **Migratory Bird Hunter Survey (Individuals)** | | | | | | | |
| Form 3-2056J | 37,000 | 1 | 37,000 | 5 minutes | 3,083 | 34.90 | $ 107,608.33 |
| Form 3-2056K | 23,100 | 1 | 23,100 | 4 minutes | 1,540 | 34.90 | 53,746.00 |
| Form 3-2056L | 8,900 | 1 | 8,900 | 4 minutes | 593 | 34.90 | 20,707.33 |
| Form 3-2056M | 12,000 | 1 | 12,000 | 3 minutes | 600 | 34.90 | 20,940.00 |
| ***Subtotals:*** | ***81,000*** |  | ***81,000*** |  | ***5,817*** |  | **$ 203,001.67** |
| **Parts Collection Survey (Individuals)** | | | | | | | |
| Form 3-165 | 4,200 | 22 | 92,400 | 5 minutes | 7,700 | 34.90 | $ 268,730.00 |
| Form 3-165A | 1,000 | 5.5 | 5,500 | 5 minutes | 458 | 34.90 | 15,995.83 |
| Form 3-165B | 3,600 | 1 | 3,600 | 1 minute | 60 | 34.90 | 2,094.00 |
| Form 3-165C | 400 | 1 | 400 | 1 minute | 7 | 34.90 | 232.67 |
| Form 3-165D | 1,100 | 1 | 1,100 | 1 minute | 18 | 34.90 | 639.83 |
| Form 3-165E | 900 | 1.5 | 1,350 | 5 minutes | 113 | 34.90 | 3,926.25 |
| ***Subtotals:*** | **11,200** |  | **104,350** |  | **8,356** |  | **$ 291,618.58** |
| **Sandhill Crane Harvest Survey (Individuals)** | | | | | | | |
| Form 3-2056N | 4,000 | 1 | 4,000 | 3.5 minutes | 233 | 34.90 | $ 8,143.33 |
| **TOTALS:** | **96,249** |  | **190,134** |  | **137,493** |  | **$ 6,392,524.38** |

\*Numbers rounded to match ROCIS

**Migratory Bird Harvest Information Program**: Although state licensing authorities are collecting the name and address information needed to provide a sample frame of all licensed migratory bird hunters, that information collection is required by Federal regulation. Therefore, the reporting burden associated with that information collection is reported here. The Service estimates that the 49 states will collect the required information from approximately 3,800,000 individuals annually. States are using a variety of methods to collect the required information, and the amount of time required for an individual respondent to provide the information varies from less than 1 minute to up to 4 minutes, depending upon the method employed by the state. We estimate that the overall average time per response is 2 minutes.

The states then compile a list of migratory bird hunters in their state and send it to the Service. States send their first list of hunter names to the service in August and continue to send updated entries at 2 week intervals until the end of the migratory bird hunting seasons in their state. The number of hunters on each list varies, depending on the time of year and the number of migratory bird hunters in the state. On average, the lists contain 4,710 records and we receive an average of 16 lists per state per year. The total annual burden estimate for the Migratory Bird Harvest Information Program is 123,088 hours.

**Migratory Bird Hunter Survey**: The frequency of response for each form involved is once annually. Although many respondents report that they did not hunt for the species for which they are being surveyed, they still need about 2 minutes to read the instructions prior to responding. Therefore, each of the following form-specific burden estimates includes 2 minutes per respondent for reviewing instructions on the form.

About 37,000 hunters respond to Form 3-2056J (waterfowl harvest survey) each year; the number of hunting trips reported ranges from zero to as many as 100, with an average of 3 trips reported per respondent. Recording and summarizing the trips requires an average of 1 minute per trip (3,083 total burden hours).

About 23,100 hunters respond to Form 3-2056K (dove-pigeon harvest survey), with the number of trips reported ranging from zero to about 30. The number of trips reported averages 2, and the time required to report and summarize the trips averages 1 minute per trip (1,540 total burden hours).

About 8,900 hunters respond to Form 3-2056L (woodcock harvest survey) each year, with response burden averaging 1 minute per trip and respondents averaging 2 trips (593 total burden hours).

About 12,000 respondents are also expected for Form 3-2056M (snipe, coot, rail, and gallinule harvest survey) each year, with response burden again averaging 1 minute per trip and respondents expected to average 1 trip (600 total burden hours).

The total annual burden estimate for all 4 forms used for the Migratory Bird Hunter Survey is 5,817 hours.

**Parts Collection Survey**: About 4,200 respondents provide waterfowl parts in Form 3-165 (waterfowl wing envelope). Response frequency for Form 3-165 varies from once to up to 200 times annually dependent on the amount and success of hunting by individuals, averaging about 22 times per individual. The estimated time required to complete form 3-165 is 5 minutes, and about 92,400 completed forms are received annually (7,700 total burden hours).

About 1,000 respondents will provide wings using Form 3-165A (woodcock, rail, gallinule, and band-tailed pigeon wing envelope), averaging 5.5 responses per individual annually. The estimated time to complete Form 3-165A is 5 minutes, and about 5,500 forms are received annually (458 total burden hours).

Approximately 3,600 hunters will respond to Form 3-165B (request to provide waterfowl parts). Response frequency is once annually, and it will require about 1 minute to complete the form (60 total burden hours).

About 400 hunters will respond to Form 3-165C (request to provide wings from woodcock, rails, gallinules, and band-tailed pigeons). Response frequency is once annually, and it will require about 1 minute to complete the form (7 total burden hours).

Approximately 1,100 respondents will respond to Form 3-165D (request to provide wings from mourning doves). The response frequency is once annually, and it will require about 1 minute to complete the form (18 burden hours).

Approximately 900 hunters will provide mourning dove wings using Form 3-165E (mourning dove wing envelope), averaging 1.5 responses per individual annually. The estimated time to complete Form 3-165E is 5 minutes, and about 1,350 forms are received annually (113 total burden hours).

Thus, the total annual burden estimate for the Parts Collection Survey is 8,356 hours.

**Sandhill Crane Harvest Survey:** About 4,000 hunters respond to form 3-2056N; the number of hunting trips reported ranges from zero to as many as 20, with an average of 1.5 trips reported per respondent. Recording and summarizing the trips requires an average of 1 minute per trip for a total of 233 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.**

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

**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.**

The total estimated annual cost to the Federal Government is $1,731,584 (rounded) ($891,584 (rounded) for salaries and $840,000 for operating costs). We used Office of Personnel Management Salary Table [2017-DCB](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with BLS News Release [USDL-17-0321](https://www.bls.gov/news.release/pdf/ecec.pdf), March 17, 2017, Employer Costs for Employee Compensation—December 2016. Most work is done from the Patuxent Wildlife Research Center in Laurel, MD, so the DC area salary table was used.

**Table 1 – Salaries and Benefits: $880,369** (average grades/steps with 100% of time dedicated to program)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Position** | **Grade/Step** | **2017-DCB Annual Salary** | **Total Salary, Inc. Benefits**  **(Salary X 1.59)** | **Number of Positions** | **Total Salary Costs** |
| Branch Chief | GS-14/05 | $ 126,958 | $ 201,863.22 | 1 | $201,863.22 |
| Biologist | GS-13/05 | 107,435 | 170,821.65 | 1 | 170,821.65 |
| Biologist | GS-11/05 | 75,377 | 119,849.43 | 1 | 119,849.43 |
| Lead Survey Clerk | GS-06/05 | 45,836 | 72,879.24 | 1 | 72,879.24 |
| Survey Clerk | GS-05/05 | 41,121 | 65,382.39 | 3 | 196,147.17 |
| Administrative Assistant | GS-07/05 | 50,935 | 80,986.65 | 1 | 80,986.65 |
| Speciator/Survey Contractor | GS-05/05 | 41,121 | 65,382.39 | 0.25 | 16,345.60 |
| Half-time Speciator | GS-05/05 | 41,121 | 65,382.39 | 0.5 | 32,691.20 |
| **Subtotal - Table 1:** | | | | | **$891,584.15** |

**Table 2 - Operating Costs: $840,000** (printing and mailing survey forms, packing and mailing wing envelopes, processing incoming data, producing reports, coordinating with state agency partners, and implementing modernizations)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Activity/Survey** | **Travel** | **Postage** | **Printing** | **Contracts, Supplies, & Equipment** | **Total Operating Costs** |
| Parts Collection Survey | 37,500 | 272,700 | 70,000 | 37,000 | 417,200 |
| Harvest Surveys (Diary) |  | 307,500 | 65,000 | 6,800 | 379,300 |
| Harvest Surveys Support and Operations | 5,000 | 10,000 |  | 28,500 | 43,500 |
| **Subtotal – Table 2:** | **42,500** | **590,200** | **135,000** | **72,300** | **840,000** |

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

We are reporting the following based on adjustments to agency estimates since the previous submission (See Table 15.1 for itemization by IC):

• A decrease of 37,452 total annual responses

• A decrease of 6,528 annual burden hours

In order to more accurately report the burden associated with the Migratory Bird Hunter and the Parks Collection Surveys, the burden associated with each form for the Migratory Bird Hunter and Parts Collection Surveys was entered into ROCIS separately. Previously, these surveys were entered as two ICs using the average time for the forms associated with each survey. Entering each form separately provides a more accurate depiction of the total burden associated with this collection. It also provides a more accurate method of calculating the total dollar value of the burden hours.

**Table 15.1 – Change in Burden Since Previous 2014 Submission**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Activity** | **Previously Approved by OMB** | | | **Current Request** | | | **Change Due to Adjustment in Agency Estimate** | | |
| **Annual Responses** | **Burden Hours** | **Burden Dollars** | **Annual Responses** | **Burden Hours** | **Burden Dollars** | **Annual Responses** | **Burden Hours** | **Burden Dollars** |
| **Migratory Bird Harvest Information Program (State Governments)** | | | | | | | | | |
|  | 686 | 126,910 | 0 | 784 | 123,088 | 0 | 98 | -3,822 | 0 |
| **Migratory Bird Hunter Survey (Individuals)** | | | | | | | | | |
| Form 3-2056J | 84,200 | 6,027 | 0 | 37,000 | 3,083 | 0 | -47,200 | -2,944 | 0 |
| Form 3-2056K | 0 | 0 | 0 | 23,100 | 1,540 | 0 | 23,100 | 1,540 | 0 |
| Form 3-2056L | 0 | 0 | 0 | 8,900 | 593 | 0 | 8,900 | 593 | 0 |
| Form 3-2056M | 0 | 0 | 0 | 12,000 | 600 | 0 | 12,000 | 600 | 0 |
| **Subtotals:** | **84,200** | **6,027** | **0** | **81,00** | **5,116** | **0** | **-3,200** | **-211** | **0** |
| **Parts Collection Survey (Individuals)** | | | | | | | | | |
| Form 3-165 | 134,400 | 10,600 | 0 | 92,400 | 7,700 | 0 | -42,000 | -2,900 | 0 |
| Form 3-165A | 0 | 0 | 0 | 5,500 | 458 | 0 | 5,500 | 458 | 0 |
| Form 3-165B | 0 | 0 | 0 | 3,600 | 60 | 0 | 3,600 | 60 | 0 |
| Form 3-165C | 0 | 0 | 0 | 400 | 7 | 0 | 400 | 7 | 0 |
| Form 3-165D | 0 | 0 | 0 | 1,100 | 18 | 0 | 1,100 | 18 | 0 |
| Form 3-165E | 0 | 0 | 0 | 1,350 | 113 | 0 | 1,350 | 113 | 0 |
| **Subtotals:** | **134,400** | **10,600** | **0** | **104,350** | **8,356** | **0** | **-30,050** | **-2,244** | **0** |
| **Sandhill Crane Harvest Survey (Individuals)** | | | | | | | | | |
| Form 3-2056N | 8,300 | 484 | 0 | 4,000 | 233 | 0 | -4,300 | -251 | 0 |
| **TOTALS:** | **227,586** | **144,021** | **0** | **190,134** | **137,493** | **0** | **-37,452** | **-6,528** | **0** |

We are also reporting a decrease in the annualized cost to the government of $174,116, from $1,905,700 in 2014 to $1,731,584 in 2017. This decrease in cost is due primarily to the loss of IT staff who were consolidated into the USFWS’ IRTM IT support program. Other changes to the costs associated with the information collection are as follows:

1. Changes to the allocation of sampling effort in the Mourning Dove Parts Collection Survey following an analysis of optimal allocation to increase sampling efficiency; this resulted in a net decrease in sampling effort and reduced costs.
2. Changes in the calculations used (median step salary rates vs. actual) to account for fluctuations in encumbered positions/salaries;
3. The Federal 2017 pay raise;
4. An increase in postage costs (from $0.43 to $0.46 for first class letter); and
5. Reduced respondent burden from decreasing hunter participation in the surveys, partly due to reduced harvest (fewer wings returned), and fewer active hunters
6. Reduced sample size for sandhill crane harvest survey, due to improved state permitting systems to identify crane hunters from the general hunting population.

We have implemented some measures to keep costs down, including contracting out the printing of the survey forms. We found that printing contractors could do the job more cheaply than we could. We will also be developing an online data entry application for implementation in 2-3 years, which when implemented is expected to reduce printing and postage costs by 10-30% ($60,000-200,000/year). We will seek OMB approval prior to implementing any changes to the data collections methods used with this collection.

**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.**

Plans are to continue the Migratory Bird Harvest Surveys annually as long as migratory bird hunting seasons are opened in the U.S.

**Schedule for Migratory Bird Harvest Information Program**: The schedule for the Migratory Bird Harvest Information Program varies among states and is dependent upon the license structure used in that state. States have differing hunting license structures, including license that are valid from 1 January-31 December, 1 September-31 August, 1 April – 31 March, and 365-days from date of purchase. These data are generally sent from August-February, but some states send data year-round. Migratory bird hunter names and addresses are received from the states, either in the form of electronic databases or on paper forms from which the data are compiled in a database.

**Schedule for the Migratory Bird Hunter Survey**

Sep-Feb Sampled migratory bird hunters are sent questionnaires asking them to keep track of their hunting trips throughout the hunting season and return the form when they have completed their hunting season.

Dec-Apr Following a staggered schedule based on the closing date of the hunting season in each state, sampled hunters who have not returned questionnaires are sent reminder letters and replacement questionnaire forms. Responses are accepted until the end of April.

Apr-May Response data are edited, compiled in a database, and analyzed.

Jun-Jul The report on non-waterfowl species must be prepared and distributed by early June, in time for the public meeting on hunting regulations for those species and publication in the Federal Register and various status reports. The report on waterfowl must be prepared and distributed by early July, in time for the public meeting on waterfowl hunting regulations and publication in the Federal Register. The complete harvest report is distributed both internally and externally and made available on our website: [http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm](http://www.fws.gov/migratorybirds/reports/reports.html)

**Schedule for the Parts Collection Survey**

Jun Postcards soliciting participation in the survey are mailed to the public from the Service in Laurel, Maryland. Respondents return the postcard to the Service in Laurel, Maryland. Names and addresses of respondents are compiled in a database.

Jul-Aug Employees prepare the parts envelopes for mailing.

Aug-Oct Because they must be in the possession of survey participants at the start of the hunting season, parts envelopes are sent to participants about 2 weeks before the hunting season begins in each state. Hunting seasons open as early as September 1 in many states, and as late as early November.

Sep-Mar Hunters mail parts to collection points in each Flyway throughout the hunting season, which continues to mid-March in some states.

Nov-May Federal and state biologists assemble at one of six collection points to identify the species, age, and sex of each part between late November and mid-March. Late arriving parts are sent to Laurel in early April and identified there. Parts are accepted until May.

Feb-May Completed data slips (form #s) are shipped to Laurel, where the data are compiled in a database. Data are analyzed in combination with information derived from the Migratory Bird Hunter Survey to generate species-specific estimates of harvest.

Aug-Sep Estimates are presented in annual dove, woodcock, band-tailed pigeon, and sandhill crane status reports that are published by August 15. Waterfowl harvest estimates that are used in harvest strategies driven by population models must be provided internally to the Service’s Division of Migratory Bird Management for model input by mid-August. The complete harvest report is available by the end of September and is distributed both internally and externally and accessible on our website. [http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm](http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.html)

**Schedule for Sandhill Crane Harvest Survey**: In all states but Alaska, participating states issue permits to sandhill crane hunters in mid-July. Electronic or paper copies of issued permits (showing names and addresses of permittees) are sent to the Division of Migratory Bird Management, Laurel, Maryland, following the end of the crane hunting season in each state. Upon receipt of name and address cards, computer records of each name/address are produced, hunters are selected, and surveys are mailed. These questionnaires are mailed to permittees approximately two weeks after the close of the respective hunting seasons. A follow-up questionnaire is mailed to non-respondents approximately one month later. In recent years, the latest crane season has closed in early February. Thus distribution of follow-up forms is completed in early April and the analysis of data commences in May. The sample frame for the estimating sandhill crane harvest from Alaska is provided from the Migratory Bird Harvest Information Program. Survey procedures are the same as for the other states, except that the survey can be sent out before the close of the sandhill crane hunting season because of earlier receipt of sample frame information. An annual report is available by August on our website: [http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.htm](http://www.fws.gov/migratorybirds/NewReportsPublications/HIP/hip.html)

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB approval expiration date on the survey forms.

**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.