

1 Supporting Statement A for Paperwork Reduction Act Submission

Conservation Order for Light Geese, 50 CFR 21.60 OMB Control Number 1018-0103

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 Migratory Bird Treaty Act (16 U.S.C. 703-712) implements the four bilateral migratory bird treaties the United States entered into with Great Britain (for Canada), Mexico, Japan, and Russia. The Act authorizes and directs the Secretary of the Interior to allow hunting, taking, etc., of migratory birds subject to the provision of and in order to carry out the purposes of the four treaties. Section VII of the U.S.-Canada Migratory Bird Treaty authorizes the taking of migratory birds that, under extraordinary conditions, become seriously injurious to agricultural or other interests.

Midcontinent light geese (MCLG) are overabundant and destroy arctic and subarctic breeding habitats in Canada essential to their own survival and to other migratory bird populations. On February 16, 1999, the Fish and Wildlife Service (we, Service) published a final rule (64 FR 7517) that established a conservation order for MCLG (50 CFR 21.60). This regulation authorized States and tribes in the midcontinent region to control MCLG within the United States using alternative regulatory strategies within the conditions that we provide in the conservation order. We withdrew this regulation to prevent further litigation from several anti-hunting groups that opposed the conservation order. Subsequently, Congress passed the Arctic Tundra Habitat Emergency Conservation Act (Pub. L. 106-108), which reinstated the conservation order regulations published on February 16, 1999. On December 20, 1999 (64 FR 71236), we published a final rule that notified the public that congressional action resulted in reinstatement of 50 CFR 21.60 until we could complete an Environmental Impact Statement on light goose management. We published a Final EIS on light goose management in June 2007 and reaffirmed 50 CFR 21.60 in a final rule published on November 5, 2008 (73 FR 65926). Publication of this final rule now supersedes the Arctic Tundra Habitat Emergency Conservation Act which is no longer in effect.

North American light geese are comprised of lesser snow geese (*Anser caerulescens caerulescens*), greater snow geese (*A. c. atlantica*), and Ross' geese (*A. rossii*). We refer to these species and subspecies collectively as light geese due to their light coloration, as opposed to "dark" geese such as Canada and white-fronted geese. Most populations of light geese are increasing in numbers. Light geese that nest in the central and eastern Arctic and migrate through the central U.S. are comprised of two populations: Midcontinent population and western central flyway population of lesser snow and Ross' geese (combined). The two species are combined in the population terminology for management purposes. Midcontinent light geese (MCLG) refers to the combination of the two populations. Greater snow geese nest in the eastern Arctic and migrate to the mid-Atlantic region of the United States.

The number of MCLG has increased exponentially over the past several decades in prairie Canada and the Midwestern United States, primarily due to the expansion of agriculture and a concurrent increase in food supply. These rapidly expanding populations have placed an unprecedented amount of pressure on arctic and subarctic breeding habitats. Large, expanding concentrations of MCLG, coupled with a short tundra growing season, have resulted in removal

of vegetation by feeding geese. Loss of vegetation leads to increased evaporation and hypersaline soils, resulting in severe habitat degradation along west Hudson and James Bays, and in the Queen Maude Gulf regions of northern Canada. Symptoms of habitat degradation are appearing in other arctic and subarctic regions as well. Negative impacts to other migratory bird populations have been documented both on the breeding grounds and along migration routes.

Similarly, the greater snow goose population has increased exponentially in recent decades. Although impacts of high populations on nesting habitats have not reached levels observed in the midcontinent region, greater snow geese have impacted marsh habitats on migration areas in Quebec and the Mid-Atlantic region, and have also caused significant problems with agricultural depredations.

MCLG populations must be reduced to avoid further loss of an ecosystem essential to migratory bird populations. Before implementing the conservation order, we attempted to curb the growth rate of MCLG populations by liberalizing bag limits and increasing the light goose hunting season to 107 days, the maximum allowed by the Migratory Bird Treaty Act, as amended. Although these changes resulted in increased harvest, the harvest rate (percent of population harvested) continued to decline as populations grew exponentially. Clearly, traditional wildlife management strategies were not working. Therefore, we established an alternative regulatory strategy to effectively and efficiently reduce MCLG populations, which precluded the use of more drastic, direct control measures.

Before implementing the conservation order, MCLG could only be harvested during traditional hunting season framework dates between September 1 and March 10, the dates set in the Migratory Bird Treaty with Canada. Most of the harvest of MCLG occurs in the United States. Use of population reduction measures on the Canadian breeding grounds would be cost-prohibitive, dangerous, inefficient, and out of our jurisdiction. Therefore, we created the conservation order to control light geese by authorizing States/tribes to implement alternative regulatory strategies for MCLG outside of the Treaty framework dates. We use the conservation order approach to also reduce the greater snow goose population and reduce their impact to natural marsh habitats and agricultural interests. The States/tribes may conduct a population reduction program under the authority of the conservation order within the conditions that we provide.

The conservation order allows States/tribes to implement population control measures without having to obtain a permit, thus significantly reducing their administrative burden. States/tribes may allow the use of additional methods of take described within the conditions of the conservation order and can maximize the potential to increase take of light geese by authorizing take beyond March 10. Establishing a conservation order to reduce light goose populations is a streamlined process that affords an efficient and effective population reduction strategy, rather than addressing the issue through our permitting process. Furthermore, this strategy precludes the use of more drastic and costly direct population-reduction measures such as trapping and culling geese. Light goose numbers continue to remain high, and we believe that maintenance of the conservation order and associated information collection is needed to keep the population in check and to monitor harvest.

The conservation order has been in place for 18 years, and we concluded that we could reduce the information collection burden on participating States and still get sufficient information for management purposes. On March 16, 2015 (80 FR 13497) we published a final rule that reduced the information collection requirements for participants in the light goose conservation

order. This rule eliminated information collection and reporting requirements that we no longer believed was necessary. This action relieved requirements on individuals, States, and tribes.

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.

As mentioned above, we revised 50 CFR 21.60(f)(8) to reduce information collection requirements. We now require that States and tribes keep annual records of only the following activities carried out under the authority of the light goose conservation order:

- the number of persons participating in the conservation order;
- the number of days people participated in the conservation order;
- the number of light geese shot and retrieved during the conservation order; and
- the number of light geese shot, but not retrieved.

Each State determines the method by which they collect this information. Because of the differing licensing systems in each State, it was not possible to develop a common form or method. Each State differs in the administration of the conservation order. Some require permits; others do not. Although, the Atlantic Flyway States developed a standard survey form template, the Central and Mississippi Flyways were not able to do so. We solicit hunter activity through a variety of methods (e.g., paper-based hunting diary, online data entry screen, telephone, mail, etc.).

The recordkeeping requirement is necessary to ensure that those individuals carrying out control activities are authorized to do so. The States/tribes must submit an annual report summarizing the activities conducted under the conservation order on or before September 15 of each year. Tribal information can be incorporated in State reports to reduce the number of reports submitted.

We use the information collected to assess the efficacy of the conservation order and to help us to determine if more rigorous MCLG control methods are needed.

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.

Participating States/tribes develop their own methodology for collecting information for the light goose conservation order. States may submit the information electronically via email. Allowing States/tribes to submit their reports electronically reduces administrative burden to respondents and the Federal Government. We currently summarize data collected for all three Flyways that harvest light geese. Tables of summarized data are provided to participating States. We estimate that 5% of individuals/households and 80% of State/Tribal governments will utilize electronic submission.

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.

No duplicate information is collected elsewhere in the Service, nor does any other Federal agency collect information of this type.

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

Since the conservation order is available only to State wildlife agencies and tribes, no small businesses or other small entities are affected by the information collection requirements. Individuals who are participants in the conservation order provide information on their experience to the States. We collect only the minimum information necessary to ensure the effectiveness of the program.

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.

States/tribes are not allowed to participate in the conservation order in a given year unless they collect information on activities conducted under the program. Without such information, we would not be able to evaluate the effectiveness of the population control program and could not fulfill our responsibilities under the Migratory Bird Treaty Act. Collections conducted less frequently than annually would not allow us to properly manage light geese populations.

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 circumstances 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 July 3, 2017, we published in the *Federal Register* (82 FR 30883) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on September 1, 2017. We received the following two comments in response to that notice:

Comment #1: Received from Central Flyway Council on August 31, 2017 via email.

To whom it may concern:

The Central Flyway Council (CFC) would like to thank the U.S. Fish & Wildlife Service (USFWS) for the opportunity to comment on Proposed Information Collection; Conservation Order for Light Geese (hereafter LGCO). The LGCO provides an important option in the aim of managing light goose populations and has been implemented widely among the Central Flyway states. Per its requirement, states annually report LGCO number of participants, number of days, and number of birds shot (retrieved and unretrieved). While the reporting requirements were eased in 2015 for the expanded methods of take, overall the CFC maintains its 2011 stance and encourages the USFWS to develop a single survey to be conducted by USFWS. The CFC believes that this would be the most appropriate method for annually monitoring the participation and harvest during the LGCO and would produce the best quality data for use in informing future management.

The USFWS provides no funding to states for monitoring take under the LGCO and there are no guidelines or requirements for the methods used in collecting and analyzing this important information. Thus, survey methods, sampling frames, sample sizes, and data analyses are left to the discretion of the states. This is highlighted in the Arctic Goose Joint Venture's 2007 Light Goose Habitat Working Group report that assessed how different states collected and analyzed the required harvest information for the LGCO and the cost of these surveys. The report notes the variability of methods of obtaining names and addresses of potential LGCO participants (e.g., sampling all license holders vs. sampling only those issued special LGCO permits) as well as post-harvest survey questions and questionnaire delivery methods differed greatly among states (most using mail but some used phone survey). Differences also existed within similar survey types, such as the proportion of participants surveyed and the type and number of follow-up contacts. Less than half of the states applied some form of non-response bias correction. The methods and details of these non-response bias corrections were not investigated; however, only two states corrected their survey responses for memory or prestige bias. Follow-up mailings are a standard practice used to increase response rate and thus sample sizes for calculating harvest estimates. Low response rates can increase the

level of non-response bias in the harvest estimates. Non-response bias, if not corrected for, generally produces an over-estimate of harvest or other parameters because the analysis assumes that the non-respondents have the same participation rate, hunting success, and other characteristics as those that respond to initial and even second mailings. Thus, there is likely a high degree of variability in the consistency and comparability of estimates among states.

Most states routinely collect information on hunting activity and harvest for most of their resident game species that are hunted or trapped (i.e., big game, game birds, small game, and furbearers). Because of this, states are able to incorporate some type of harvest survey for the LGCO into their annual harvest survey processes. However, because there is no consistency in sampling frames, survey questions, survey methods, or data analysis among the states, the validity of an overall harvest estimate obtained by totaling the results from 17 individual states is highly suspect.

In Canada, hunting activity and harvest of light geese for the LGCO is estimated by the Canadian federal harvest survey. Canadian provinces do not collect information on LGCO harvest and participation. We believe that a valid and consistent estimate, using a method similar to the Canadian model, of participation and harvest that occurs during the LGCO is an important part of monitoring the success of efforts to manage the light goose overpopulation problem. It is highly unlikely that an accurate and consistent “nationwide” estimate of LGCO harvest and participation can be obtained by combining the results from 17 disparate state-run surveys.

In conclusion, the CFC believes that a single survey conducted by USFWS is the most appropriate and accurate method for annually monitoring the participation and harvest in the LGCO. This approach has been used by USFWS since 1960 to monitor waterfowl harvest nationally. Once again, thank you for the opportunity to comment.

Sincerely,

Tony Leif
Chair, Central Flyway Council

Agency Response to Comment #1: Implementation of the light goose conservation order required using new methods of take that were controversial (e.g. unplugged shotguns, electronic goose calls) because historically they had been illegal during normal hunting seasons. For that reason, we required information be collected on the use of such tools so that we could evaluate their effectiveness. In 2015, at the request of Flyway Councils, we determined that sufficient information had been collected on the effectiveness and frequency of use of such tools and we streamlined data collection requirements by eliminating the requirement to collect information on the number of birds harvested using different methods of take (80 FR 13497).

With regard to the Central Flyway proposal to implement a single, uniform survey conducted by the USFWS, during discussions with Flyway Councils regarding initiation of the conservation order in the late 1990s, raised concerns about developing a national information collection for the conservation order. We did not pursue that approach due to the need to develop a new Federal permit, which we continue to believe is not a feasible alternative at this time. It was decided that each State would conduct its own information collection. Although State harvest estimates may not be fully comparable due to differences in methodology, we believe that summation of such estimates is warranted for general monitoring purposes.

Our existing Harvest Information Program (HIP) is geared towards estimating harvest of birds during regular hunting seasons that end on or before March 10 each year. Many States hold their light goose conservation order (not a regular hunting season) after March 10. Therefore, if HIP was used to estimate light goose conservation order harvest, our annual HIP reports would be delayed and could affect the normal hunting regulations promulgation process. The Service can only require HIP registration for regular hunting seasons to develop a sampling frame. There is no current mechanism for the Service to require HIP registration for conservation order participants. Therefore, there no sampling frame exists from which to conduct a single, uniform Federal survey.

Comment #2: Received from Jean Publiee on July 5, 2017 via email.

public comment on federal register

what liars exist in the usfws. they callit a "conservation order". what it is is a killing murderous application to kill geese. they lie when they say populations have gone up.

the fact is in the changing climate with food sources being out of whack, with plastic all over in our oceans, with chemical toxicity in america at an all time high, with hunting bein gapprove for them in greater numbers every year to sell licenses, and with less and less habitat for them to live on, it is clear that these species have a hrd time staying alive in america these days.

this agency is a total liar. dont believe anything they print or write. they skew everything and slant everything to kill and murder so license can be sold to kill these animals. this agency is totally destructive to wildlife in america. they use and abuse wildlife for their moneygrubbing activities. they slant the commitees so that only hunters sit on their committes and some farmers. they dont have a cross section of the american public. they keep you out if you are an animal protector. you get nothing.

they fill the committees that determine the wildlife with hunters and farmers, both of which are anti wildiife. both grouips want to kill wildlife. the rest of us and we are in the majority clearly and we have no voice at this agency. we are ramrodded into silence and never get a seat on any wildlife management agency in any way in any state in this nation nor on any of their affiliated agencies like fisha nd wildife founmdation. all of the money they operate on comes from 325 million people, but you dont get any management say unless youy are a wildlife killers.

something has gone very very wrong with these state and wildlife agencies. they have become hunters and farmers agencies and they keep out the rest of us. hunters are less than 1% of the us population and so are farmers so why dont the rest of us - the 98% of us have any voicee in what is going on with wildlife anymore. this is an evil agency. they need to be cleaned out and replaced with a cross section of the american public. we cant stand fo these wildlife attacks anymore and the lying of this agency.,

this isnt "conservation. this is murder and killniog. i totally oppose allowing this anymore. this comment is for the public record. of course the corruption in the washington swamp has allowed this horror to happen. washington dc is so corrupt and money is the reason for everything. we need some compassion to take over. jean publiee

Agency Response to Comment #2: Our long-term objectives continue to include providing opportunities to harvest portions of certain migratory game bird populations and to limit harvests to levels compatible with each population’s ability to maintain healthy, viable numbers. Having taken into account the zones of temperature and the distribution, abundance, economic value, breeding habits, and times and lines of flight of migratory birds, we conclude that the hunting seasons are compatible with the current status of migratory bird populations and long-term population goals. With regard to the light goose conservation order, we documented the exponential growth of light goose populations when we authorized the conservation order (64 FR 7517 and 73 FR 65926). In those Federal Register notices, we also documented degradation to breeding habitats as a result of feeding actions of overabundant light goose populations. For that reason, we implemented the conservation order to increase harvest above that which occurs during regulator hunting seasons. Furthermore, we continue to annually document high population levels of light geese in our annual Waterfowl Status Report (<https://www.fws.gov/migratorybirds/pdf/surveys-and-data/Population-status/Waterfowl/WaterfowlPopulationStatusReport17.pdf>). Any suggestion that the Fish and Wildlife Service is lying about the population level of light geese, or their impact to habitats, is simply ignoring scientific facts.

Additionally, we are obligated to, and do, give serious consideration to all information received as public comment. While there are problems inherent with any type of representative management of public-trust resources, the Flyway Council system of migratory game bird management has been a longstanding example of State-Federal cooperative management since its establishment in 1952. Public input is provided not only at the Federal level but also at the State level and the input from State public processes is reflected in the Flyway system. Therefore, public involvement from hunters and non-hunters (including those that are not farmers) alike occurs at multiple levels. We disagree that input from the non-hunting, non-agricultural public is ignored. Furthermore, because the Federal government does not sell hunting licenses our actions associated with light goose management are not tied to selling additional hunting licenses. Because the light goose conservation order is not a hunting season, States do not require the purchase of a hunting license to participate and therefore cannot benefit from additional hunting license sales.

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who are familiar with this collection of information in order to validate our time burden estimates and asked for comments on the questions below:

Table 8.1

Organization	Title
New York State Dept. of Environmental Conservation	Migratory Game Bird Specialist
North Carolina Wildlife Resources Commission	Migratory Game Bird Coordinator
Maryland Department of Natural Resources	Wildlife Biologist
Mississippi Dept. of Wildlife, Fisheries and Parks	Wildlife Biologist
Iowa Dept. of Natural Resources	Wildlife Biologist
Illinois Dept. of Natural Resources	Wildlife Biologist
South Dakota Game, Fish and Parks Dept.	Senior Waterfowl Biologist
Kansas Dept. of Wildlife, Parks and Tourism	Wildlife Biologist
Colorado Parks and Wildlife	Wildlife Biologist

“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 respondents agreed that the information is necessary. However, one state agency indicated that they do not directly use the information for its purposes. One state agency felt that information on the number of geese shot but not retrieved is unnecessary.

Agency Response/Action Taken: We agree that the information is necessary regardless of whether an individual state directly utilizes the data for its own purposes. Summation of data from all participating states is necessary to adequately monitor light goose harvest on a continental level. With regard to collection of information on the number of geese shot but not retrieved, we disagree and feel adequate monitoring of the magnitude of birds lost to crippling is necessary to prevent unnecessary waste of the light goose resource. We made no changes to the collection of information in response to these comments.

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

Comments: Only three agency personnel commented on our estimate of burden hours to individuals. Two of the 3 respondents felt that our burden hour estimate for individuals (8 minutes) was accurate, whereas the third indicated their estimate was only 7 minutes per individual. Two agency personnel commented on our burden estimate for agencies and felt that our estimate was accurate. 7 of the 9 respondents did not address our estimate but provided their estimate of burden hours their agency used in connection with this information collection. Burden hours reported from the 9 individuals from State agencies varied widely (range 24 to 450 hours).

Agency Response/Action Taken: We believe, based on the comments and our experience administering this collection of information, that our estimate of burden hours to individuals was accurate. Therefore, we did not make any changes from our 2015 submission. It is unclear why one agency would require 450 hours to collect and summarize information from individuals and prepare a report, while another only required 24 hours. We do not feel the report of 450 hours is reflective of the average amount of burden hours. Therefore, using burden hour estimates reported from 8 of the 9 respondents, we determined that each State will require an average of 114 hours to collect information from participants, maintain records, and prepare an annual report.

Based on the results of our outreach, we updated the time burden for the government reporting from 45 hours (42 for reporting plus 3 for recordkeeping) to 114 hours (106 hours for reporting plus 8 for recordkeeping). The time burden for the individual category remained the same at 8 minutes. The table shown in question 12 reflect these updated burden estimates.

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

Comments: No comments received.

Agency Response/Action Taken: None required.

And

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

Comments: 5 of 9 respondents suggested that the FWS should take over responsibility of collecting this information from participants with a uniform Federal survey.

Agency Response/Action Taken: With regard to the proposal to implement a single, uniform survey conducted by the USFWS, during initial discussions with Flyway Councils regarding initiation of the conservation order in the late 1990s, there were concerns about whether to develop a national information collection for the conservation order. We did not pursue that approach due to the need to develop a new Federal permit, which we continue to believe is not a feasible alternative at this time. It was decided that each State would conduct its own information collection. Although State harvest estimates may not be fully comparable due to differences in methodology, we believe that summation of such estimates is warranted for general monitoring purposes at a continental scale.

Our existing Harvest Information Program (HIP) is geared towards estimating harvest of birds during regular hunting seasons that end on or before March 10 each year. Many States hold their light goose conservation order (not a regular hunting season) after March 10. Therefore, if HIP was used to estimate light goose conservation order harvest, our annual HIP reports would be delayed and could affect the normal hunting regulations promulgation process. The Service can only require HIP registration for regular hunting seasons to develop a sampling frame. There is no current mechanism for the Service to require HIP registration for conservation order participants. Therefore, there no sampling frame exists from which to conduct a single, uniform Federal survey.

The Service has recently contracted with the 18F group from the General Services Administration to review our harvest surveys program with the intent of modernizing the technologies we use to conduct surveys. This modernization effort will hopefully increase efficiencies and reduce costs. Once this modernization effort is completed (time frame unknown) the Service potentially could use the improved survey to conduct the light goose information collection. However, it is unknown at this point whether a new Federal permit would be required to do so.

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

We do not provide any 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 to respondents. The information we collect is not subject to the requirements of the Privacy Act (5 U.S.C. § 552a). Any records provided to us will be available under the Freedom of Information Act (5 U.S.C. 552).

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 21,577 annual responses (39 States and 21,538 individuals) totaling 7,318 burden hours. We estimate the total dollar value of the annual burden hours to States, Tribes, and individuals to be \$317,325 (rounded).

We used the below listed rates for individuals and government published in the Bureau of Labor Statistics (BLS) News Release [USDL-17-1222](#), September 8, 2017, Employer Costs for Employee Compensation—March 2016, to calculate the total annual burden:

- Individuals - Table 1 lists the hourly rate for all workers \$36.09, including benefits.
- Government - Table 3 lists the hourly rate for all workers as \$48.06, including benefits.

Activity	Annual No. of Respondents	Number of Submissions Each	Total Annual Responses	Completion Time per Response*	Annual Burden Hours**	Hourly Labor Costs Incl. Benefits	Dollar Value of Annual Burden Hours
Conservation Order for Control of Light Geese (State/Tribal Governments)							
Reporting	39	1	39	106 hours	4,134	\$ 48.06	\$ 198,680.04
Recordkeeping				8 hours	312	48.06	14,994.72
Conservation Order Participants - Provide Information to States (Individuals or Households)							
Reporting	21,538	1	21,538	8 minutes	2,872	\$ 36.09	\$ 103,650.48
Total	21,577		21,577		7,318		\$ 317,325.24

*Time burden estimates increased for the State/Tribal government reporting based on the feedback received during our targeted outreach as explained in question 8.

**Rounded

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.**

We estimate that each participating State/tribe will incur overhead costs (materials, printing, postage, etc.) associated with mailing surveys to conservation order participants of approximately \$2,000, or a total of \$78,000 in non-hour burden costs (39 responses x \$2,000). Conservation order participants manually report the data back to the States/tribes who then report it electronically to the Service (as explained in question 3).

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 annual cost to the Federal Government to administer this information collection is \$173 (rounded) ($\$69.26 \times 2.5 \text{ hours} = \173.15). There is minimal cost to the Federal Government, because we only monitor the number of light geese harvested to ensure that the harvest is in line with our projections.

We used Office of Personnel Management Salary Table [2017-DCB](#) to obtain the most up-to-date hourly rates for a GS-12/05 staff member (\$43.29). We used BLS News Release [USD-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016, and multiplied the hourly wage by 1.6 to account for benefits resulting in a fully burdened rate of \$69.26. We estimate an annual total of 2.5 hours for a GS-12 to prepare a spreadsheet consolidating the information, review the harvest totals, and maintain the necessary files.

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

Based on the results of our outreach, we updated the time burden for the government reporting from 45 hours (42 for reporting plus 3 for recordkeeping) to 114 hours (106 hours for reporting plus 8 for recordkeeping). The time burden for the individual category remained the same at 8 minutes. The table shown in question 12 reflect these updated burden estimates. In 2015 we reduced the number of survey questions to individuals. Therefore, we assumed that the burden hours to states would decline. We cannot explain the increase in burden hours estimated by state agencies when the survey was reduced in size. It is possible that the burden hour estimates were gross over-estimates of actual time spent processing and reporting survey results. Nevertheless, we used the average burden hour estimates reported from 8 of the respondents, which resulted in an increase from the 2015 submission.

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.

We will not publish the results of this information collection, but will provide a summary to participating States.

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.

This information collection is associated with regulatory requirements. We will display the OMB control number and expiration date on appropriate materials.

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.