

**1SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION**

**Hunting and Fishing Application Forms and
Activity Reports for National Wildlife Refuges
50 CFR 25.41, 25.43, 25.51, 26.32, 26.33, 27.42, 30.11, 31.15, 32.1 to 32.72**

OMB Control Number 1018-0140

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 National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee), as amended (Administration Act), and the Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act) govern the administration and uses of national wildlife refuges and wetland management districts. The Administration Act consolidated all the different refuge areas into a single "Refuge System." It also authorizes us to permit public uses, including hunting and fishing, on lands of the Refuge System when we find that the activity is compatible and appropriate with the purpose for which the refuge was established. The Recreation Act allows the use of refuges for public recreation when the use is consistent with or does not interfere with the primary purpose(s) of the refuge.

We make provisions in our general refuge regulations (50 CFR 25.41, 25.43, 25.51, 26.32, 26.33, 27.42, 30.11, 31.15, 32.1 to 32.72) for public entry for specialized purposes, including hunting and fishing. These regulations provide the authorities and procedures for allowing hunting and fishing on national wildlife refuges and wetland management districts outside the State of Alaska. We collect the information to assist us in administering these programs in accordance with statutory authorities that require that recreational uses be compatible with the primary purposes for which the areas were established.

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.

Many refuges offer hunting and fishing activities without collecting any information. Those refuges that do collect hunter and angler information do so seasonally, usually once a year at the beginning of the hunting or fishing season. Some refuges may elect to collect the identical information via a non-form format (letter, email, or through discussions in person or over the phone). Some refuges provide the form electronically over the internet. In some cases, because of high demand and limited resources, we often provide hunt opportunities by lottery, based on dates, locations, or type of hunt. We do not make the information we collect available to the public, except perhaps for final season summaries of the information.

We have made the following minor changes to the forms based on comments from our outreach:

- On each of the application forms, we added a longer signature line for the guardian to

print and sign.

- On each form, we added language in the Notice to state: "It is our policy not to use your name or email for any other purpose."
- On each of the application forms, based on the targeted outreach documented in question 8, we lowered the estimated time burden for filling out the forms from 30 minutes to 15 minutes.
- On each of the Report forms, based on the targeted outreach documented in question 8, we lowered the estimate time burden for filling out the forms from 15 minutes to 10 minutes.

Hunting Applications/Permits

We have five forms for our national wildlife refuges to use for hunting applications. Not all species are hunted at each refuge, and some refuges are open to fishing while others are not. To avoid confusion to hunters and to simplify the process, we have separate applications for refuges to use depending on what opportunities are available. At some refuges, the forms may also serve as hunting permits.

- FWS Form 3-2354 (Quota Deer Hunt Application).
- FWS Form 3-2355 (Waterfowl Lottery Application).
- FWS Form 3-2356 (Big Game Hunt Application).
- FWS Form 3-2357 (Migratory Bird Hunt Application).
- FWS Form 3-2358 (Fishing/Shrimping/Crabbing Application)

We collect information from individuals seeking hunting and fishing experiences. We ask for the following information:

- Name of the refuge: Determines what field station will receive and process the information.
- Date of application: We often have application deadlines and this information helps staff determine the order in which applications were received. It also ensures that the information is current.
- Applicant information: We collect name, address, phone number, and email so we can contact the applicant/permittee either during the application process or after receiving a permit.
- Hunt Date: We ask hunters for their preferences for hunt dates.
- Hunt Location: We ask hunters for their preferences for hunt units, areas, or blinds.
- Hunt methods: Some refuges hold multiple types of hunts, i.e. archery, shotguns, primitive weapons, etc. We ask for this information to identify which opportunity a hunter is applying for.
- Special hunts: Some refuges hold special hunts for youth, hunters who are disabled, or other underserved populations. We ask hunters to identify if they are applying for these special hunts. For youth hunts, we ask for the age of the hunter at the time of the hunt.
- Species: Some refuges allow only certain species, such as moose, elk, or bighorn sheep to be hunted. We ask hunters to identify which species hunt they are applying for.
- Activity: On fishing permits, we ask what type of activity (crabbing, shrimping, etc.) is being applied for.
- Signature and date: To confirm that the applicant understands the terms and conditions of the permit.
- As a condition of the permit, some refuges require hunting and fishing gear left overnight to be labeled with the owner's name, address, and phone number. This minimal information is necessary in the event the refuge needs to contact the owner.

Harvest/Fishing Activity Reports

We have four activity reports, depending on the species. We ask users to report on their success after their experience so that we can evaluate hunt quality and resource impacts. We use the following activity reports, which we distribute during appropriate seasons, as determined by State or Federal regulations:

- FWS Form 3-2359 (Big Game Harvest Report).
- FWS Form 3-2360 (Fishing Report).
- FWS Form 3-2361 (Migratory Bird Hunt Report).
- FWS Form 3-2362 (Upland/Small Game/Furbearer Report).

We collect the following information:

- Name of refuge and location: We ask this to track responses by location, which is important when we manage more than one refuge or activity area from one office.
- Date: We ask when the hunter/angler participated in the activity. This helps us identify use trends so we have resources available.
- Hours/Time in/out: We ask this to determine how long the hunter/angler participated in the activity. We also use this to track use so we can allocate resources appropriately.
- Name, City, State: We ask for a name so we can identify the user. We ask for residence information to help establish use patterns (if users are local or traveling).
- Number harvested/caught based on species: We ask this to determine the impacts on wildlife/fish populations, relative success, and quality of experience.
- Species harvested/caught: We ask this to determine the impacts on wildlife/fish populations, relative success, and quality of experience.

Comments: We provide hunters/anglers an opportunity for comments, recommendations, and information for refuge staff.

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.

The hunting and fishing application forms and report forms are available online in a fillable, 508-compliant format. Most refuges use postmarks to determine eligibility deadlines; therefore, we expect that most will require users to fill out the form and return it by mail. In some cases, the application and permit are on the same form, so review and approval by a refuge official is necessary. Individuals can return activity reports by email, mail, fax, or drop box. A few refuges with complex hunting programs prefer to use a third party online permit provider. We estimate that 15% of applications and activity reports will be submitted electronically. Through this process information is more readily available to the user. It reduces the burden of time and money compared to the previous method of numerous mail outs. The automation of the report prompts required users to complete a series of questions related to their specific hunt. Questions are asked one at a time and answers are selected from a drop down menu.

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.

There is no duplication with other information collection activities. The information is specific to the applicant and the use or activity and is not available from any other source. We limit the information requested to the minimum necessary to establish eligibility, resource protection, and to demonstrate the applicants are aware of information they need to know to participate safely and within refuge regulations.

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

This collection of information affects only individuals participating in hunting and fishing opportunities on national wildlife refuges. Commercial guides for hunting and fishing are administered through Special Use Permits (FWS Form 3-1383-R, 3-1383-C, and 3-1383-G), which are approved under OMB Control No. 1018-0102.

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.

Without the information requested in the hunting and fishing applications, we would be unable to effectively manage and implement hunting and fishing programs on refuges. Refuges often have more potential hunters and anglers interested in opportunities that space and resources allow. Using a quota or lottery system is the only fair way to administer these programs. In other circumstances, permit applications allow refuge staff to identify use trends, determine needs, and enhance public safety. Harvest/creel reports allow refuge staff to determine hunter/angler success, evaluate resource impacts, and improve customer service as use trends are identified. Information is usually collected on either an as-needed basis (one-time or one-season event) or an annual basis.

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

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

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

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

On August 31, 2017, we published in the *Federal Register* ([82 FR 41421](#)) a Notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on October 30, 2017. We did not receive any comments in response to that Notice:

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 estimate and asked for comments on the questions below:

Table 8.1

Organization	Title
N/A	Private Citizen Waterfowl Hunter
N/A	Private Citizen Waterfowl Hunter
N/A	Private Citizen Big Game Hunter
N/A	Private Citizen Big Game Hunter
N/A	Private Citizen Hunter
N/A	Private Citizen Hunter
N/A	Private Citizen Hunter/Angler
N/A	Private Citizen Hunter/Angler
N/A	Private Citizen Hunter/Angler

“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: Six of the nine respondents answered this question and felt the collection is reasonable and necessary to better manage refuge hunt programs. There were no negative responses.

FWS Response/Action Taken: No action was necessary based on the positive responses.

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

Comments: Six of the nine respondents answered this question and they felt that the estimate of burden was too high, that it was not a significant burden, and that the time to fill out an application or a report was less than 10 minutes.

FWS Response/Action Taken: Based on the feedback received during the outreach and our experienced administering this collection, we noted their comments. The feedback from six individuals is not a good representation based on the total number of respondents in this collection so we did not change the burden response times for any of the forms.

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

Comments: Two respondents said that there is no way to enhance the form. One respondent offered a suggestion for clarification on a term used on two of the report forms. The suggestion was to change the term “knocked” down to “shot” down.

FWS Response/Action Taken: We changed the term “knocked” to “shot” on the Migratory Bird Hunt Report (3-2361) and the Small Game Furbearer Report (3-2362).

And

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

Comments: Three of the 6 respondents that answered this question mentioned they did not have any suggestions. Three respondents said that an electronic sign-in or mobile app is the future of hunting data management. One respondent mentioned that names of the additional hunters on the permit form should be included on the form for law enforcement purposes.

FWS Response/Action Taken: We made no changes to the form based on these responses. We agree that there are technological advancements that can enhance the user experience. The USFWS is taking steps to provide more opportunities for online forms and apps. For the response regarding adding additional hunter names from a hunting party to the permit form, although a good suggestion perhaps for the particular refuge in question, is not necessary from the perspective of our law enforcement program and hunt programs as a whole.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records ([Permits System-Interior, FWS-21](#), 68 FR 52610).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

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

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

We estimate that **805,492** respondents will each complete a hunting application and/or a hunting/fishing activity report each year. The total annual burden for this information collection is **201,502** hours. We estimate the total dollar value of the burden hours for this collection to be **\$9,573,822** (rounded - \$4,793,776 for applications and \$4,780,046) for activity reports). We have included non-form information collection in these burden estimates.

- *Applications.* We estimate that on the 372 national wildlife refuge and wetland management districts with hunting programs and 309 refuges and wetland management districts with fishing programs, we will receive 269,011 application forms each year. We estimate that each form will take 15 minutes to complete totaling 112,088 annual burden hours.
- *Hunting/Fishing Activity Reports.* We estimate that 536,481 hunters and anglers will fill out activity reports each year. Each form will take approximately 10 minutes to complete totaling 89,414 annual burden hours.

Hunters and anglers represent a variety of professions and income levels. Table 1 of the BLS News Release [USDL-17-1646](#), December 15, 2017, Employer Costs for Employee Compensation—September 2017, lists the hourly rate for all workers \$35.64, including benefits.

Activity	Annual Number of Responses	Completion Time per response	Total Annual Burden Hours	Total \$ Value of Burden Hours (\$35.64/hour)
FWS Form 3-2354	170,892	30 minutes	85,446	\$ 3,045,295.44
FWS Form 3-2355	88,274	30 minutes	44,137	1,573,042.68
FWS Form 3-2356	2,424	30 minutes	1,212	43,195.68
FWS Form 3-2357	4,949	30 minutes	2,475	88,191.18
FWS Form 3-2358	2,472	30 minutes	1,236	44,051.04
Subtotal Applications	269,011		134,506	\$ 4,793,776.02
FWS Form 3-2359	83,527	15 minutes	20,882	744,225.57
FWS Form 3-2360	398,919	15 minutes	99,730	3,554,368.29
FWS Form 3-2361	29,391	15 minutes	7,348	261,873.81
FWS Form 3-2362	24,644	15 minutes	6,161	219,578.04
Subtotal Activity Reports	536,481		134,120	\$ 4,780,045.71
Totals:	805,492		268,626	\$ 9,573,821.73

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 the non-hour burden cost to respondents to be approximately **\$65,000**. We charge fees for hunting applications at approximately 31 of the 408 refuges that are open for hunting and/or fishing. Fees range from \$1.00 to \$10.00 per application. Each year, approximately 11,000 individuals pay an average hunting application fee of \$6.00.

To calculate the average cost per response (for the estimated 11,000 respondents), we divided 11,000 by the 269,011 total respondents to obtain a multiplier of 0.04. We then multiplied 0.04 x the average rate of \$6.00 per application to obtain a weighted average fee of 0.24 to use in ROCIS. The resulting total non-hour burden in ROCIS is \$64,563, which is slightly less than our estimate of overall estimate of \$65,000.

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 the total annual cost to the Federal Government to administer this information collection to be \$24,152,655 (\$23,352,655 for salary/benefits and \$800,000 for overhead (printing, copying, postage, etc.)). See tables below for salary/benefit information.

We used the Office of Personnel Management's Salary Table [2018-RUS](#) to determine the hourly wages. In accordance with BLS News Release [USDL-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016, we multiplied the hourly rated by 1.59 to calculate the fully burdened hourly rates.

Applications: For each application, we will receive forms; process information; determine permittees by lottery, drawing, or other method; and advise applicants of their success. We will spend about 1 hour per application for a total of \$12,040,932 (269,011 responses x 1 hour x weighted average of \$44.76).

Position	Grade	Hourly Pay Rate	Hourly Rate (Incl. Benefits)	Percent of Time Spent on Collection	Weighted Average (\$/hr)
Clerical, unskilled (i.e. receptionist, office asst.)	GS-07/05	\$22.46	\$35.61	60%	\$21.37
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.24	52.85	30%	15.86
Management (Refuge Manager)	GS-13/05	47.38	75.33	10%	7.53
Weighted Average \$/hr)					\$44.76
Total Hours					269,011
Sub-total of Salary/Benefits to Process Applications					\$12,040,932

Activity Reports: We will consolidate and process the information and evaluate management implications. Processing time for activity reports is approximately 30 minutes each for a total of \$11,145,414 (536,481 responses x .5 hour x weighted average of \$41.55).

Position	Grade	Hourly Pay Rate	Hourly Rate (Incl. Benefits)	Percent of Time Spent on Collection	Weighted Average (\$/hr)
Clerical, unskilled (i.e. receptionist, office asst.)	GS-07/05	\$22.46	\$35.61	75%	\$26.71
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.24	52.85	15%	7.93
Management (Refuge Manager)	GS-13/05	47.38	75.33	10%	7.53
Weighted Average \$/hr)					\$42.17
Total Hours					268,241
Sub-total of Salary/Benefits to Process Activity Reports					\$ 11,311,723

The total salary/benefits for application and activity report processing is \$23,352,655 (rounded).

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

We are estimating 805,492 responses totaling 201,502 annual burden hours for this collection. This is an increase of 15,692 responses and 4,601 burden hours. We are also reporting an

increase of \$4,563 in non-hour burden cost. These increases are due to increased application submissions.

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 do not plan to publish this information.

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 number and expiration date.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.