

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

**North American Woodcock Singing Ground Survey
OMB Control Number 1018-0019**

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 (MBTA) (16 U.S.C. 703-711) requires the Secretary of the Interior, delegated to the U.S. Fish and Wildlife Service (we, Service), to implement a viable and ongoing program for the protection and conservation of various migratory birds. The MBTA and the Fish and Wildlife Act of 1956 (16 U.S.C. 742a–754j-2) designate the Department of the Interior as the primary agency responsible for:

- Management of migratory bird populations frequenting the United States, and
- Setting hunting regulations that allow for the well-being of migratory bird populations.

These responsibilities dictate that we gather accurate data on various characteristics of migratory bird populations. The North American Woodcock Singing Ground Survey is an essential part of the migratory bird management program and provides the data necessary to determine the population status of the woodcock. In addition, the information is vital in assessing the relative changes in the geographic distribution of the woodcock.

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.

The Service's Division of Migratory Bird Management (DMBM) uses the information to assess the status of woodcock populations and to develop recommendations for hunting regulations. The Service, State, and Provincial conservation agencies, university associates, and other interested parties also use the information for various research and management projects. The Canadian Wildlife Service, Provinces, and States rely on the Service to administer and coordinate this survey.

State, local, tribal, Provincial, and Federal conservation agencies, as well as other participants, use FWS Form 3-156 to conduct annual field surveys. Instructions for completing the survey and reporting data are on the reverse of the form. Observers mail or fax FWS Form 3-156 to the DMBM, or enter the information electronically through the Internet, <https://migbirdapps.fws.gov/woodcock>.

We collect observer information (name, telephone, email address, and mailing address) so that we can contact the observer if questions or concerns arise.

Observers provide information on:

- Sky condition, temperature, wind, and precipitation.
- Stop number.

- Odometer reading.
- Time at each stop.
- Number of American Woodcock males heard peenting.
- Disturbance level.
- Comments concerning the survey.

We use the information that we collect to analyze the survey data and prepare reports. Assessment of the population's status serves to guide the Service, the States, and the Canadian Government in the annual promulgation of hunting regulations.

Results from the survey collection are available to the public over the Internet at: <https://migbirdapps.fws.gov> or by contacting the USFWS (summarized, tabular format), and at <https://www.fws.gov/birds/surveys-and-data/reports-and-publications/population-status.php> (report format).

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 reporting procedure requires that respondents use pen or pencil to fill out FWS Form 3-156. A pdf version of FWS Form 3-156 is available to cooperators at a password-protected website. After completing the form in the field, respondents can voluntarily submit data electronically. Given that many routes in the survey fall outside of cell reception range, the only method of data collection is by using this survey form. We still require that observers send in their original survey forms because in almost all cases observers write more on the survey form than they do within the remarks section in the data entry website. This can help us catch hazardous conditions or explain why a person took too long driving between stops. Having the hard copy form in hand also helps the USFWS personnel identify possible data entry errors, typos, and helps answer questions about missing data. Many times, if there is a problem with the data in the database, we can find the answer on the form rather than having to contact the observer or state/provincial coordinator directly.

Respondents access the electronic data form through the Internet at the Service password protected website < <https://migbirdapps.fws.gov/woodcock/>>. As indicated in item 12, it takes approximately 8 minutes to enter the data from FWS Form 3-156 into the electronic survey form. Much of the electronic form is pre-filled, which reduces data entry time. Directly after submission, respondents receive an online confirmation that the data were successfully entered into the database.

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.

We are not aware of any duplication. Within the Federal government, DMBM is the sole organizational unit charged with monitoring the population status of migratory game birds. Also, the realm of migratory bird management is small. If similar sources of information were available or even possible, DMBM would be aware of them.

5. If the collection of information impacts small businesses or other small entities,

describe any methods used to minimize burden.

The survey does not impact small businesses or other small entities.

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.

Migratory game bird populations are dynamic and can change in size and status from year to year. For this reason, the promulgation of hunting regulations has traditionally been an annual activity, and, thus, annual assessments of the population status of the more important species, including woodcock, are desirable. Without information on the population's status, we might promulgate hunting regulations that are:

- Not sufficiently restrictive, which could cause harm to the woodcock population, or
- Too restrictive, which would unduly restrict recreational opportunities afforded by woodcock hunting.

Another consequence of not conducting the surveys is that we could be vulnerable to litigation charging mismanagement and failure to fulfill treaty and other obligations.

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 conduct this collection 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 Friday, October 13, 2017, we published in the *Federal Register* ([82 FR 47763](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 12, 2017. We received one comment in response to that notice but it did not address the information collection requirements. No changes to the information collection were made as a result of this comment.

We meet with representatives from States and Provinces within each region annually to discuss survey procedures and results (see table below). Individual cooperators also have the opportunity to express concerns directly by including notes or letters with FWS Form 3-156 or contacting DMBM directly through phone or email.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified in Table 8.1 who 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
Maryland Department of Natural Resources	Representative
New Brunswick's Energy and Resource Development	Biologist
NH Fish and Wildlife	Waterfowl Project Leader
NYS Department of Environmental Conservation	Representative
PA Game Commission	Biologist Aid
WV Division of Natural Resources	Migratory Game Bird Coordinator
Indiana Division of Fish and Wildlife	Representative
Ohio Division of Natural Resources	Wildlife Biologist
Michigan Division of Natural Resources	Representative

“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: Every commenter thought the collection of information was necessary and has practical utility. Many indicated that this is the only survey that collects information on and monitors population trends of the American woodcock. It is the most important effort managers undertake for woodcock. Data obtained from this survey was used to develop explicit population and habitat goals for the American Woodcock Conservation Plan that was completed in 2008.

The population index derived from the survey is the primary metric used for the U.S. harvest strategy developed cooperatively by the USFWS and Flyways in 2010. This strategy is the primary metric used in setting annual hunting frameworks. Results are also used widely for making management decisions across the range of the American woodcock. The SGS detected long term population declines through the species' range, which triggered active habitat management to restore woodcock populations. Without the SGS to show the extent of the loss, the region-wide habitat initiative would not have occurred. It can also serve as a good performance audit, since bird population response can be monitored post-management to ensure that habitat restoration activities are hitting their objectives. It is also used as a comparison tool for states that collect other types of woodcock survey information. It is used for hunters to determine flush rates based on the changes in the population index.

FWS Response/Action Taken: There was no action taken by the FWS since all thought there was practical utility and it is necessary.

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

Comments: The majority thought our estimates of burden for this collection were accurate. A few indicated that new observers getting up to speed might take longer than the experienced observer who has already conducted the survey. For those that choose to review it, the observer tutorial training presentation will take an extra 5 minutes to review that has not been previously calculated into the burden estimate because it is a pretty new addition. It was also suggested to add an additional 15 minutes for those observers who choose to pre-run their survey route. This is highly recommended, but not required.

FWS Response/Action Taken: It is impossible to predict the exact number of new observers to the survey each year, however, with additional internal research it might be possible to determine the average number per year, say over the past 5 years, of new observers in the survey. This can help us account for the additional burden minutes it might take per observer in future information collection renewals. We did add an additional 5 minutes to view the training presentation since this was instituted after the last information collection renewal for this survey. Since it is only recommended, but not required, that observers pre-run their survey route, we are not incorporating this additional burden time into the estimate because we have no way of knowing how many observers actually do this consistently, if at all, over time. Pre-run basically means the observer drives the 3.6 mile route length before the actual survey starts to look for changes along the route (new traffic patterns, road closures, flooded roads, etc.) that might prevent them from completing the survey or completing it in a timely manner. It also helps to familiarize the observer with turns and stop locations.

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

Comments: Most respondents indicated none to this question and indicated that the survey was very clear, concise and well thought out. However, one commenter suggested a multi-state assessment of the timing of the survey period across latitudes to ensure that the phenology and timing of migration has not significantly shifted.

Another comment recommended refresher training of observers every so many years to ensure data remains high quality and methods remain consistent. Another comment

suggested requiring hearing tests of observers (either official medical testing or informational field testing) prior to participation, specifically for those older observers or those that are avid shooters.

A commenter also indicated he had some confusion with the time zone he lives in and the suggested sunset times that are printed on each unique survey form. Another commenter had a readability suggestion on the form and that it would help to color code every other line for the 10 stops to make it easier for an observer while recording data when referring to the data form while entering the data online.

FWS Response/Action Taken: In regards to the multi-state assessment, there has already been a study that investigated the timing of the survey windows based on data collected from satellite-marked male and female woodcock in the Central Management Region. Results of this study are forthcoming and while preliminary results have been presented at the 11th American Woodcock Symposium, the final report will eventually be published in the proceedings. Recommendations from this study do suggest further evaluation of the timing of the survey window with additional satellite-marked male woodcock studies using a larger sampling pool across a larger coverage area. Another satellite-marked study is also going to start to take place later this year in the Eastern Management Region.

To address additional refresher training for observers, we have already started to do this by incorporating the additional training presentation that observers view. This presentation was developed for the SGS in light of observer questions, comments, and suggestions in regards to survey protocol, guidelines, and general FAQ's. We hope this will help prevent future data loss from observer error as well. We are not in a position to require a hearing test of observers, but rather make suggestions that observers periodically bring someone else along to listen for woodcock peenting and then compare numbers heard.

It is the responsibility of the observer to know what time zone the route is located and to use the corresponding suggested sunset times printed on the form. If questioned or errors are found, they are dealt with on a case by case basis. The USFWS is currently working on revising their survey form to comply with USFWS form standards (i.e. logo placement) and to address things like color coding lines to make it easier to read. It should be ready for release by the 2019 survey season. There are no plans to change the information collected that is shown on the current form, it will just be displayed differently.

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

Comments: No one had any suggestions on ways to minimize the burden of the survey since it is already a low-burden survey and one commented on how fun it was to get out into the field and hear woodcock.

FWS Response/Action Taken: No response or action taken.

Additional comments received during the outreach:

Comments: One comment indicated that the instructions, data sheet, and submitting the data online is as concise as it can be without losing clarity and decreasing data accuracy. Another commented that the process is as efficient as can be expected for an effort like this. Instructions are simple and clear. They indicated that the travel time to and from the route was the most time consuming part, as an observer, but it was not excessive and they do not

know how to mitigate it. They also indicated that the survey seems to run like a well-oiled machine from his vantage point. Another commented that the survey is valuable.

FWS Response/Action Taken: No response or action taken.

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 ([Migratory Bird Population and Harvest Surveys – Interior, FWS-26](#), 46 FR 18378, published May 12, 2015).

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 sensitive questions.

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 there will be **808 annual responses** totaling **1,515 annual burden hours** associated with this information collection, with a total annualized cost burden of **\$63,376** (rounded).

Approximately 808 non-Federal cooperators conduct the survey and submit forms annually. For each response, we estimate it will take cooperators an average of 1.75 hours to supply the needed information. This includes time for:

- Reviewing instructions, map and training presentation (10 minutes)
- Gathering data during survey stops (30 minutes)
- Completing and reviewing the survey form (5 minutes)
- Driving time to and from the survey site (1 hour)

Approximately 775 cooperators (96% percent) will voluntarily choose to submit data electronically, which adds an additional 8 minutes to the response time, or a total of 1.88 hours per response.

Table 12.1 – Annual Response and Burden Hour Calculations

Activity	Annual Number of Respondents	Total Annual Responses	Average Completion Time	Total Annual Burden Hours*
Survey (Electronic Submission)	775	775	1.88 hours	1,457
Survey	33	33	1.75 hours	58
Totals:	808	808		1,515

*Rounded

We calculated the benefits for both U.S. and Canadian cooperators in accordance with Bureau of Labor Statistics (BLS) News Release [USDL-18-0451](#), March 20, 2018, Employer Costs for Employee Compensation—December 2017. We used the [May 2016 National Industry-Specific Occupational Employment and Wage Estimates - State Government](#) from the Bureau of Labor Standards website to determine the dollar value of the U.S. burden hours [\$26.73 (mean hourly labor cost for a State Government zoologist/wildlife biologist) multiplied by 1.59 to account for benefits, resulting in an annual cost factor of \$42.50 per hour].

We used the Statistics Canada website, [CANSIM tables 282-0069 and 282-0073](#), last modified on 2018-03-09 to determine labor cost information for Canadian cooperators (average hourly wage for natural and applied sciences and related occupations). We obtained February 2018 labor cost information for biologists in each Province (Ontario, Nova Scotia, New Brunswick, Quebec, Prince Edward Island, and Manitoba) participating in the survey, and then averaged all the Provinces together. We estimate the average dollar value of a Canadian burden hour to be \$33.09 CAD (see Table 12.3). Using the exchange rate in effect on March 16, 2018 (1.00 CAD = 0.7639 USD), we estimate the dollar value of a Canadian burden hour to be \$25.28 USD, which we multiplied by 1.59 to account for benefits (\$40.20 USD).

Table 12.2 – Total Value of Annual Burden Hours

Respondents (Government)	Annual Burden Hours	Hourly Labor Costs	Hourly Labor Costs (Incl. Benefits)	Total \$ Value of Annual Burden Hours (Rounded)
United States	1,075	\$26.73	\$42.50	\$ 45,688
Canadian	440	\$25.28	\$40.20	17,688
Totals:	1,515			\$ 63,376

Table 12.3 – Calculation of Canadian Burden Hour Average

	Average Hourly Wage (\$)	Overall Average
Ontario	\$ 36.87	\$ 33.09
Nova Scotia	33.86	
New Brunswick	32.42	
Quebec	33.80	
Prince Edward Island	28.84	
Manitoba	32.77	
<i>Subtotal:</i>	<i>\$ 198.56</i>	

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 are no nonhour burden costs to respondents.

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 **\$70,860** (rounded) (\$70,410 (rounded) for salaries and \$450 for operating costs).

We used Office of Personnel Management Salary Table [2018-DCB](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with News Release [USDL-18-0451](#), March 20, 2018, Employer Costs for Employee Compensation—December 2017.

Table 14.1 - Salary Costs

Federal Staff	Hourly Salary	Salary (Incl. Benefits)	Total Hours	Total Salary Cost
GS-12/step 5	44.28	70.41	1,000	70,410
Total:				\$70,410

Table 14.2 - Operating Costs

Activity	Cost
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Materials	\$ 400
Postage	50
Total:	\$ 450

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

We are reporting a net increase of 49 responses and 161 total burden hours with this submission. There were quite a few changes that caused adjustments in both hour and cost burden since our last ICR submission. Based on the feedback received during our outreach as explained in question 8, we added an additional 5 minutes of training per observer, which increased the average completion time to increase by 0.08 hours. We also have more respondents who enter data electronically, as well as the increase in reporting burden of an additional 8 minutes per respondent (based on our outreach reported in question 8). These changes, compared to our 2015 submission, are shown below:

Activity	2015 Submission	2018 Submission
Survey	1.67 hours	1.75 hours
Survey (Electronic Submittal)	1.8 hours	1.88 hours

We adjusted the Federal salary costs since we no longer have as many federal staff assisting with the survey. We also adjusted the operating costs since most survey materials are now sent back and forth electronically. Office materials to coordinate the survey went up to adjust for inflation and additional office materials needed. U.S. hourly labor costs went up to adjust for cost of living increases as did the benefits percentage by 0.09. Canadian hourly labor costs went down due to the exchange rate adjustment from 2014.

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.

Analytical techniques are in the annual American Woodcock Population Status Report under METHODS. We distribute this status report both internally and externally.

Form 3-156 sent to cooperators	Early spring
Survey	April - May
Collection of forms	April - May
Data analysis	June
Report writing	July-August
Publication date	August
Service Regulations Committee Meeting (recommendations on hunting season)	October

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

We will display the OMB control number and expiration date.

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

There are no exceptions to the certification statement.