

# 1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## National Wildlife Refuge Visitor Check-In Permit and Use Report OMB Control Number 1018-0153

**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 refuges into a single "Refuge System." It also authorizes us to permit public uses 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, 26, 27, 30, 31, and 32) for public entry for specialized purposes. We monitor wildlife-dependent recreation programs on refuges on a regular basis to ensure the refuge is meeting its objectives while at the same time providing safe, quality experiences for visitors. We use Fish and Wildlife Service (FWS) Form 3-2405 to collect visitor data that will allow refuge managers to monitor, evaluate, and adaptively manage programs to meet established standards. Refuges that have limited activities may be able to collect information by a nonform method, such as a sign-in sheet or verbally.

We have 591 refuges and wetland management districts, of which approximately 459 are open to the public. Visitors participating in public use programs are frequently in remote locations on some refuges. When used, the visitor must display the form in their vehicle while on the refuge. This ensures a much shorter response time by law enforcement and/or search and rescue personnel when there is a call for help.

**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.**

We collect information on hunters and anglers and other visitors in order to protect refuge resources, and to administer and evaluate the success of visitor programs. Because of high demand and limited resources, we often provide visitor opportunities by permit, based on dates, locations, or type of public use. We may not allow all opportunities on all refuges and harvest information differs for each refuge. Not all refuges will use the form and some refuges may collect the information in a nonform format (through discussions in person or over the phone, by sign-in sheet, by email, or by post card). In some instances, respondents will be able to provide information verbally. Because of the span of activities and the different management needs and resources at each refuge, we do not require respondents answer all questions at every refuge. Depending on the requested activity, refuge managers will have the discretion to ask for less information than appears on the form. However, refuge managers cannot ask for more or different information. The burden listed in item 12 includes any nonform collection.

We have designed the form generically to allow its use by any refuge. Refuges customize the form to suit each refuge; e.g., name of refuge, species and method of harvest, activities, maps, permit number, etc. We uploaded an example of a customizable form a supplementary document to the IC.

FWS Form 3-2405 has three parts:

- Self-Clearing Daily Check-in Permit. Each user completes this portion of the form (date of visit, name, and telephone numbers) and deposits it in the permit box prior to engaging in any activity on the refuge.
- Self-Clearing Daily Visitor Registration Permit. Each user must complete the front side of the form (date, name, city, State, zip code, and purpose of visit) and carry this portion while on the refuge. At the completion of the visit, each user must complete the reverse side of the form (number of hours on refuge, harvest information (species and number), harvest method, angler information (species and number), and wildlife sighted (e.g., black bear and hog) and deposit it in the permit box.
- Self-Clearing Daily Vehicle Permit. The driver and each user traveling in the vehicle must complete this portion (date) and display in clear view in the vehicle while on the refuge.

We use FWS Form 3-2405 to collect:

- Information on the visitor (name, address, and contact information). We use this information to identify the visitor or driver/passenger of a vehicle while on the refuge. This is extremely valuable information should visitors become lost or injured. Law enforcement officers can easily check vehicles for these cards in order to determine a starting point for the search or to contact family members in the event of an abandoned vehicle. Having this information readily available is critical in a search and rescue situation.
- Purpose of visit (hunting, fishing, wildlife observation, wildlife photography, auto touring, birding, hiking, boating/canoeing, visitor center, special event, environmental education class, volunteering, other recreation). This information is critical in determining public use participation in wildlife management programs. This not only allows the refuge to manage its hunt and other visitor use programs, but also to increase and/or improve facilities for non-consumptive uses that are becoming more popular on refuges. Data collected will also help managers better allocate staff and resources to serve the public as well as develop annual performance measures.
- Success of harvest by hunters/anglers (number and type of harvest/caught). This information is critical to wildlife management programs on refuges. Each refuge will customize the form by listing game species and incidental species available on the refuge, hunting methods allowed, and data needed for certain species (e.g., for deer, whether it's a buck or doe and the number of points; or for turkeys, the weight and beard and spur lengths).
- Whether or not visitors observed black bear or hogs, for example. This information will help managers develop annual performance measures for hog removal and it provides information to help develop resource management planning.

- Date of visit and/or area visited.
- Comments. We encourage visitors to comment on their experience.

This above information will be a vital tool in meeting refuge objectives and maintaining quality visitor experiences. The information will help us:

- Administer and monitor visitor programs and facilities on refuges.
- Distribute visitor permits to ensure safety of visitors.
- Ensure a quality visitor experience.
- Minimize resource disturbance, manage healthy game populations, and ensure the protection of fish and wildlife species.
- Assist in Statewide wildlife management and enforcement and develop reliable estimates of the number of all game fish and wildlife.
- Determine facility and program needs and budgets.

Forms will be provided by the refuge and available at entrances to the refuge. Summary data includes number of visitors, number of hours spent on the refuge, and harvest information. We may share summaries of harvest information with State Departments of Wildlife and Fisheries in an effort to assist in the management of wildlife species throughout the State. This summary information is a valuable tool for determining wildlife populations, which affects future hunting seasons and bag limits.

We also share summary information with National Wildlife Refuge System offices and may disseminate information to the public in planning documents such as Refuge Comprehensive Conservation plans, State Fish and Game Coordination meetings, and refuge budget planning documents.

**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.**

When the form is used, a printed form is the only viable option. We may require portions of the form be displayed in their vehicle, carried on their person, or deposited in collection boxes. Each form will have a distinct, preprinted or stamped permit number. Forms must be legible, contain required information in the event of an emergency, and be a specific size for deposit in a collection box. Forms will be located at entrances to the refuges. Use of automated systems to record on-site visits is not feasible.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information collected is specific to each refuge and visit. Three questions regarding hunting and fishing are somewhat similar to questions found on the multiple hunting and fishing application and report forms (OMB Control No. 1018-0140). We designed the form mainly for those refuges that conduct limited hunts or hunts by lottery. Refuges that use FWS Form 3-2405 will not use the hunting and fishing application and report forms approved under 1018-0140. Therefore, information collected on each refuge visit is not duplicative.

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

There is no impact to small businesses or other small entities by this collection.

**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.**

Not conducting the collection would adversely affect the management of the refuge, as well as the safety of the public. As stated above, safety is a primary concern in a remote location and this collection will save valuable time and resources during an emergency. Conducting the collection on a daily basis allows us to maintain a safe, enjoyable experience for our visitors. Emergencies can happen at any time and not having this information on a daily basis would impede the efforts of law enforcement personnel in a time of crisis. There have been incidences where hunters have not returned home when expected. When notified of this, law enforcement personnel must search thousands of acres on a refuge complex to ensure the safety of that visitor.

As a management tool, it is critical to understand public use trends and receive harvest data in order to complete our mission. The National Wildlife Refuge Improvement Act directs us to facilitate compatible wildlife-dependent recreation. However, without accurate data about increased visitation to refuges there may be conflicts between uses and/or unavoidable wildlife disturbance. Refuge managers use this data to establish use limits for specific activities and areas in order to minimize conflicts between uses on the refuge.

**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.**

We ask refuge visitors to provide this information each time they enter the refuge. Therefore, visitors must respond in fewer than 30 days and it is likely many visitors will complete the form more frequently than quarterly. This is necessary to ensure visitor safety and obtain accurate data on visitor activities. No other circumstances 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 June 11, 2018, we published in the *Federal Register* (83 FR 27017) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on August 10, 2018. We received one comment that did not address the information collection. We made no changes in response to that comment.

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**

<b>Organization</b>	<b>Title</b>
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A
Private citizen	N/A

***“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:* Collections deemed necessary by respondents.

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

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

Comments: Respondents noted five to ten minutes to complete collection.

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

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

Comments: Respondents noted the collections to be concise and relevant.

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

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

Comments: Automated users noted the convenience of the interactive online collections. Respondents also feel there is no burden because the information collected is most useful.

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

The targeted outreach portion of the public comments yielded (5) total responses. Despite multiple attempts to follow-up with the remaining four individuals, we received no response.

**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. We maintain the information in accordance with the Privacy Act System of Records Notice (SORN) – [National Wildlife Refuge Permits– Interior, FWS-5](#) (64 FR 29055, published 05/28/1999). We uploaded a copy of the SORN as a supplemental document in ROCIS.

**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 we will receive **650,000 responses** totaling **54,167 burden hours**. This includes any nonform collection of data. We estimate the annual dollar value of the burden hours is **\$1,961,929** (rounded).

We used the of Bureau of Labor Statistics (BLS) News Release [USDL-18-1499](#), June 8, 2018, Employer Costs for Employee Compensation—March 2018, to calculate the cost of the total annual burden hours:

- Individuals. Table 1 lists the hourly rate for all workers \$36.22, including benefits.

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours	Hourly Rate	\$ Value of Annual Burden Hours
<b>FWS Form 3-2405</b>							
Individuals	650,000	1	650,000	5 mins.	54,167	\$ 36.22	\$ 1,961,928.74

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

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no non-hour cost burden associated with this collection of information.

**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 will be **\$4,392,000** (\$4,362,570 for salary/benefits (rounded) and \$29,430 for overhead (printing, copying, etc.)).

We used the Office of Personnel Management’s Salary Table [2018-RUS](#) to determine the hourly wages. We multiplied the hourly wages by 1.59 to account for benefits (Bureau of Labor Standards News Release [USDL-18-1499](#), June 8, 2018, Employer Costs for Employee Compensation—March 2018).

Position	Grade	Hourly Pay Rate	Hourly rate including benefits	Percent of time spent on collection	Weighted average (\$/hr)
Clerical, unskilled (i.e. receptionist, office asst.)	GS-07/05	\$ 22.46	\$ 35.71	80%	\$ 28.57
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	5%	3.77
<b>Weighted Avg (\$/hr)</b>					<b>\$ 40.27</b>

We estimate that it will take 10 minutes to process each visitor use report for a total of 108,333 hours (650,000 responses x 10 mins). The estimated salary/benefits cost to Federal Government to process visitor use reports is \$4,362,569.91 (\$40.27 weighted average \$/hr x 108,333 hours).

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

There are no program changes or adjustments.

**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.**

Data collected from these forms will include harvest summary information. All data collected will remain in summary format and we do not link it to any personal information. We will not retain the personal information; it is only necessary to address the safety issues on the day(s) of the visit as stated above. We use harvest and public use data internally for reporting purposes.

**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.