

# 1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## Hunting and Sport 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:** Currently, OMB approval of FWS Form 3-2405, "Self-Clearing Check-In/Out Permit" is under OMB Control No. 1018-0153. With this submission, the Service is requesting the transfer of the form into 1018-0140 so all forms associated with hunting and/or sport fishing activities used by the National Wildlife Refuge Systems are contained under a single information collection. Upon approval of the transfer of Form 3-2405 by OMB into OMB Control No. 1018-0140 at the final rule stage of RIN 1018-BD79, we will discontinue OMB Control No. 1018-0153 on the effective date of the final rule.

### 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 public uses of national wildlife refuges and wetland management districts. The Administration Act closes NWRs in all States except Alaska to all uses until opened. The Secretary of the Interior (Secretary) may open refuge areas to any use, including hunting and/or sport fishing, upon a determination that the use is compatible with the purposes of the refuge and National Wildlife Refuge System mission. The action also must be in accordance with provisions of all laws applicable to the areas, developed in coordination with the appropriate State fish and wildlife agency(ies), consistent with the principles of sound fish and wildlife management and administration, and otherwise in the public interest. These requirements ensure that we maintain the biological integrity, diversity, and environmental health of the Refuge System for the benefit of present and future generations of Americans.

Amendments enacted by the Improvement Act built upon the Administration Act in a manner that provides an "organic act" for the Refuge System, similar to organic acts that exist for other public Federal lands. The Improvement Act serves to ensure that we effectively manage the Refuge System as a national network of lands, waters, and interests for the protection and conservation of our Nation's wildlife resources. The Administration Act states first and foremost that we focus our Refuge System mission on conservation of fish, wildlife, and plant resources and their habitats. The Improvement Act requires the Secretary, before allowing a new use of a refuge, or before expanding, renewing, or extending an existing use of a refuge, to determine that the use is compatible with the purpose for which the refuge was established and the mission of the Refuge System. The Improvement Act established as the policy of the United States that wildlife-dependent recreation, when compatible, is a legitimate and appropriate public use of the Refuge System, through which the American public can develop an appreciation for fish and wildlife. The Improvement Act established six wildlife-dependent recreational uses as the priority general public uses of the Refuge System. These uses are:

- Hunting;
- Sport Fishing;

- Wildlife observation and photography; and,
- Environmental education and interpretation.

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 sport 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 regulate hunting and sport fishing on refuges to:

- Ensure compatibility with refuge purpose(s);
- Properly manage fish and wildlife resource(s);
- Protect other refuge values;
- Ensure refuge visitor safety; and
- Provide opportunities for quality fish- and wildlife-dependent recreation.

The Administration Act and Recreation Act also authorize the Secretary to issue regulations to carry out the purposes of the Acts and regulate uses. 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 sport fishing. These regulations provide the authorities and procedures for allowing hunting and sport 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.

The U.S. Fish and Wildlife Service (Service)'s final rule (RIN 1018-BD79) opens seven National Wildlife Refuges (NWRs) that are currently closed to hunting and sport fishing. In addition, we expand hunting and sport fishing at 67 other NWRs, and add pertinent station-specific regulations for other NWRs that pertain to migratory game bird hunting, upland game hunting, big game hunting, and sport fishing for the 2019–2020 season. We also formally open 15 units of the National Fish Hatchery System (NFHs) to hunting and sport fishing. We also add pertinent station-specific regulations that pertain to migratory game bird hunting, upland game hunting, big game hunting, and sport fishing at these 15 NFHs for the 2019–2020 season. This rule includes global administrative updates to every NWR entry in our refuge-specific regulations and the reorganization of general public use regulations. We remove approximately 2,100 regulations that will have no impact on the administration of hunting and sport fishing within the National Wildlife Refuge System. We also simplify over 2,900 refuge-specific regulations to comply with a Presidential mandate to adhere to plain language standards and to reduce the regulatory burden on the public. Lastly, we amend certain provisions of the regulations specific to Alaska NWRs. The amendments include the removal of the regulations concerning same-day airborne hunting. The additional burden of information collection through the opening of these NWRs to hunting and/or sport fishing will also be included in this application for revision to 1018-0140.

**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 sport 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 sport 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.

### **HUNTING APPLICATIONS/PERMITS**

We currently have four permit application forms, depending on the activity, approved for use by refuges:

- Form 3-2354 (Quota Deer Hunt Application).
- Form 3-2355 (Waterfowl Lottery Application).
- Form 3-2356 (Big-Upland Game Hunt Application).
- Form 3-2357 (Migratory Bird Hunt Application).

***We are proposing to revise this collection to consolidate the four existing hunt permit applications into a new single permit application, Form 3-2439, "Hunt Application/Permit."*** We plan to discontinue use of Forms 3-2354 through 3-2357 and begin using FWS Form 3-2439 as the official hunting application form. Consolidation of the four hunt permit applications into a single hunt permit application will streamline the application process and reduce burden on the respondent.

Form 3-2439 proposes to collect the following information from individuals seeking hunting experiences on the National Wildlife Refuge System:

- Lottery Application: Refuges who administer hunting via a lottery system will use Form 3-2439 as the lottery application. If the applicant is successful, the completed Form 3-2439 also serves as their permit application, avoiding a duplication of burden on the public filling out two separate forms.
- Date of application: We often have application deadlines and this information helps staff determine the order in which we received the applications. It also ensures that the information is current.
- Methods: Some refuges hold multiple types of hunts, i.e. archery, shotgun, primitive weapons, etc. We ask for this information to identify which opportunity(ies) a hunter is applying for.
- Species Permit Type: 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.
- Applicant information: We collect name, address, phone number(s), and email so we can contact the applicant/permittee either during the application process, when the applicant is successful in a lottery drawing, or after receiving a permit.
- Party Members: Some refuges allow the permit applicant to include additional hunters in their group. We collect the names of all additional hunters, when allowed by the refuge.
- Parent/Guardian Contact Information: We collect name, relationship, address, phone number(s), and email for a parent/guardian of youth hunters. We ask for this information in the event of an emergency.
- Date: We ask hunters for their preferences for hunt dates.
- Hunt/Blind Location: We ask hunters for their preferences for hunt units, areas, or blinds.
- 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.

- Signature and date: To confirm that the applicant (and parent/guardian, if a youth hunter) understands the terms and conditions of the permit.

### **SPORT FISHING APPLICATION/PERMIT**

We use Form 3-2358, "Sport Fishing-Shrimping-Crabbing Permit Application" for sport fishing, shrimping, and crabbing activities approved for use by refuges.

The form was updated to include the option for frogging, it now allows the applicant to multi-select permit activities, and now requests the applicant provide the state fishing license number. We also reformatted the form to provide the refuge with more flexibility to insert refuge-specific requirements/instructions, along with a permit number and validity dates for season issued.

We collect the following information from individuals seeking sport fishing experiences:

- Date of application: We often have application deadlines and this information helps staff determine the order in which we received the applications. It also ensures that the information is current.
- State fishing license number: We ask for this information to verify the applicant is legally licensed by the state (where required).
- Permit Type: On sport fishing permits, we ask what type of activity (crabbing, shrimping, crabbing, frogging, etc.) is being applied for.
- Applicant information: We collect name, address, phone number(s), and email so we can contact the applicant/permittee either during the application process or after receiving a permit.
- Signature and date: To confirm that the applicant (and parent/guardian, if a youth hunter) understands the terms and conditions of the permit.

### **HARVEST/FISHING ACTIVITY REPORTS**

We have four harvest/fishing 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 (Sport 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.

**PROPOSED REVISIONS TO EXISTING COLLECTION 1018-0140:** In addition to the change in the hunting application forms described above, we are also proposing the following revisions to this collection:

***(1) Labeling/Marking Requirements***

As a condition of the permit, some refuges require permittees to label hunting and/or sport fishing gear used on the refuge. This equipment may include items such as the following: tree stands, blinds, or game cameras; hunting dogs (collars); flagging/trail markers; boats; and/or sport fishing equipment such as jugs, trotlines, and crawfish or crab traps. Refuges require the owner label their equipment with their last name, the state issued hunting/fishing license number, and/or hunting/fishing permit number. Refuges may also require equipment for youth hunters include "YOUTH" on the label. This minimal information is necessary in the event the refuge needs to contact the owner.

***(2) Notifications***

On occasion, hunters may find their game has landed outside of established hunting boundaries. In this situation, hunters must notify an authorized refuge employee to obtain consent to retrieve the game from an area closed to hunting or entry only upon specific consent. Certain refuges also require hunters to notify the refuge manager when hunting specific species (e.g., black bear, bobcat, or eastern coyote) with trailing dogs. Refuges encompassing privately owned refuges, referred to as "easement overlay refuges," may also require the hunter obtain written or oral permission from the landowner prior to accessing the land.

***(3) FWS Form 3-2405 (From OMB Control No. 1018-0153)***

Currently, OMB approval of FWS Form 3-2405, "Self-Clearing Check-In/Out Permit" is under OMB Control No. 1018-0153. With this submission, the Service is requesting the transfer of the form into 1018-0140 so all forms associated with hunting and/or sport fishing activities used by the National Wildlife Refuge Systems are contained under a single information collection. Upon approval of this transfer by OMB at the final rule stage of RIN 1018-BD79, we will discontinue OMB Control No. 1018-0153.

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, sport 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.
- Photograph of animal harvested (specific refuges only). This requirement documents the sex of animal prior to the hunter being eligible to harvest the opposite sex (where allowed).
- Date of visit and/or area visited.
- Comments. We encourage visitors to comment on their experience.

Due to the wide range of hunting and sport fishing opportunities offered on the National Wildlife Refuge and National Fish Hatchery Systems, the refuges and fish hatcheries may customize the forms to remove any fields that are not pertinent to the recreational opportunities they offer. Refuges will not add any new fields to the forms, but the order of the fields may be reorganized. Refuges may customize the forms with instructions and permit conditions specific to a particular unit for the hunting/sport fishing activity.

**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.**

Due to the customization of the forms by each refuge, the hunting and sport fishing permit application forms and report forms will be accessible on each refuge's website. The OMB approved templates for each form will be accessible via the Service's website, <https://www.fws.gov/forms/>. 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.

We estimate applicants will electronically submit 15% of applications and activity reports. 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.

Currently, some refuges with complex hunting programs use a third party online permit provider to issue permits. The information collected via the websites is currently what OMB approved to be collected under this collection. We are actively working to standardize the automated permit process (FWS Forms 3-2439 and 3-2358) using the Service's new ePermit initiative to ensure consistency and to reduce burden on the public. We anticipate completion of this standardization project by mid FY2022, depending on available resources.

**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. The proposal to consolidate hunting permit applications into a single application form will further reduce duplication and burden on the respondents. The hunter will no longer have to complete multiple application forms. They will provide their information just once to apply for a hunting permit for multiple species.

**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 sport fishing opportunities on national wildlife refuges. Commercial guides for hunting and sport fishing are administered through Special Use Permits (Forms 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 sport fishing applications, we would be unable to effectively manage and implement hunting and sport 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 June 26, 2019, we published a proposed rule (84 FR 30314) which solicited comments on the new/revised information collection requirements described in this supporting statement for a period of 30 days, ending July 26, 2019. We received no comments concerning the information collection in response to the proposed rule. Additional comments are being solicited through publication of the final rule.

**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, September 4, 2003, 68 FR 52610; modification published June 4, 2008, [73 FR 31877](#)).

**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 **1,574,541 respondents** will each complete a hunting application, hunting/fishing activity report, labeling requirement, or notification requirement each year (see Table 12.1 below). The total annual burden for this information collection is **255,749 hours**. We estimate the total dollar value of the burden hours for this collection to be **\$9,403,872** (rounded).

Hunters and anglers represent a variety of professions and income levels. We used Table 1 of the [Bureau of Labor Statistics \(BLS\) News Release USDL-19-1002, June 18, 2019, Employer Costs for Employee Compensation—March 2019](#), which lists the hourly rate for all workers **\$36.77**, including benefits.

**Table 12.1**

Activity	Annual Number of Responses	Completion Time per response	Total Annual Burden Hours	Total \$ Value of Burden Hours (\$36.77/hour)
<b>Hunting and Sport Fishing Permit Applications</b>				
Form 3-2439 Hunt Application/Permit	348,689	10 minutes	58,115	\$ 2,136,882.42
Form 3-2358 Fish/Crab/Shrimp Application/Permit	2,472	5 minutes	206	7,574.62
<b>Subtotal Applications:</b>	<b>351,161</b>		<b>58,321</b>	<b>\$ 2,144,457.04</b>
<b>Harvest Activity Reports</b>				
Form 3-2359 Big Game Harvest Report	91,879	15 minutes	22,970	\$ 844,597.71
Form 3-2360 Sport Fishing Harvest Report	421,112	15 minutes	105,278	3,871,072.06
Form 3-2361 Migratory Bird Harvest Report	32,821	15 minutes	8,205	301,707.04
Form 3-2362 Upland Game Furbearer Harvest Report	25,024	15 minutes	6,256	230,033.12
<b>Subtotal Activity Reports:</b>	<b>570,836</b>		<b>142,709</b>	<b>\$ 5,247,409.93</b>
<b>New Information Collections Added to Collection</b>				
Labeling/Marking Requirements	2,160	10 minutes	360	\$ 13,237.20
Required Notifications	384	30 minutes	192	7,059.84
Form 3-2405 Check-In/Out Permit (from 1018-0153)	650,000	5 minutes	54,167	1,991,708.33
<b>Subtotal Other Requirements:</b>	<b>652,544</b>		<b>54,719</b>	<b>\$ 2,012,005.37</b>
<b>Totals:</b>	<b>1,574,541</b>		<b>255,749</b>	<b>\$ 9,403,872.35</b>

**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 **\$84,278**. We charge fees for hunting applications at approximately 31 of the 408 refuges that are open for hunting and/or sport fishing. Fees range from \$1.00 to \$10.00 per application. Each year, approximately 14,000 individuals pay an average hunting application fee of \$6.00.

To calculate the average cost per response (for the estimated 14,000 respondents), we divided 14,000 by the 351,161 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 \$84,278.

**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 **\$33,671,801 (\$32,871,801 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 [2019-RUS](#) to determine the hourly wages. In accordance with BLS News Release [USDL-19-1002, June 18, 2019, Employer Costs for Employee Compensation—March 2019](#), we multiplied the hourly rated by 1.59 to calculate the fully burdened hourly rates.

**Applications:** For each application (FWS Forms 3-2439 and 3-2538), 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 **\$16,002,407** (351,161 responses x 1 hour x weighted average of \$45.57).

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	\$ 22.84	\$ 36.32	60%	\$ 21.79
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.80	53.74	30%	16.12
Management (Refuge Manager)	GS-13/05	48.17	76.59	10%	7.66
<b>Weighted Average \$/hr)</b>					<b>\$ 45.57</b>
<b>Total Hours</b>					<b>351,161</b>
<b>Sub-total of Salary/Benefits to Process Applications</b>					<b>\$ 16,002,407</b>

**Harvest Activity Reports:** Processing time for activity reports is approximately 30 minutes each for a total of **\$12,432,808** (570,836 responses x .5 hour x weighted average of \$43.56).

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	\$ 22.84	\$ 36.32	75%	\$ 27.24
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.80	53.74	15%	8.66
Management (Refuge Manager)	GS-13/05	48.17	76.59	10%	7.66
<b>Weighted Average \$/hr)</b>					<b>\$ 43.56</b>
<b>Total Hours (570,836 responses x .5 hour)</b>					<b>285,418</b>
<b>Sub-total of Salary/Benefits to Process Activity Reports</b>					<b>\$ 12,432,808</b>

**New ICs:** Processing time for labeling requirements and notifications is minimal - estimated to be less than 5 minutes each for a total of **\$350** (2,544 responses x 5 minutes x weighted average of \$1.65).

Position	Grade	Hourly Pay Rate	Hourly Rate (Incl. Benefits)	Percent of Time Spent on Collection	Weighted Average (\$/hr)*
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Clerical, unskilled (i.e. receptionist, office asst.)	GS-07/05	\$ 22.84	\$ 36.32	1%	\$ 0.36
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.80	53.74	1%	0.53
Management (Refuge Manager)	GS-13/05	48.17	76.59	1%	0.76
<b>Weighted Average \$/hr)</b>					<b>\$ 1.65</b>
<b>Total Hours</b>					<b>212</b>
<b>Sub-total of Salary/Benefits to Process Activity Reports</b>					<b>\$ 350</b>

We estimate that it will take 10 minutes to process each FWS Form 3-2405 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 **\$4,436,236** (\$40.95 weighted average \$/hr x 108,333 hours).

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	\$ 22.84	\$ 36.32	80%	\$ 29.06
Professional and technical staff (biologist, outdoor recreation planner)	GS-11/05	33.80	53.74	15%	8.06
Management (Refuge Manager)	GS-13/05	48.17	76.59	5%	3.83
<b>Weighted Avg (\$/hr)</b>					<b>\$ 40.95</b>
<b>Total Hours</b>					<b>108,333</b>
<b>Sub-total of Salary/Benefits to Process FWS Forms 3-2405</b>					<b>\$ 4,436,236</b>

\* Rounded

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

We are proposing to revise this collection to consolidate the four existing hunt permit applications into a new single permit application, Form 3-2439, "Hunt Application/Permit." Upon receiving OMB approval of Form 3-2439 at the final rule stage, we plan to discontinue use of Forms 3-2354 through 3-2357 and begin using FWS Form 3-2439 as the official hunting application form. Consolidation of the four hunt permit applications into a single hunt permit application will streamline the application process by eliminating the need for an applicant to fill out multiple applications at the same refuge. The new form also reduces time reporting burden on the respondent. With this submission, we also standardized labeling/marketing requirements and required notifications across the Service to remove PII.

We are also proposing to transfer FWS Form 3-2405 "Self-Clearing Check-In/Out Permit" (currently approved under OMB Control No. 1018-0153) into this collection 1018-0140 so all forms associated with hunting and/or sport fishing activities used by the National Wildlife Refuge Systems are contained under a single information collection.

As a result of these changes, we are reporting:

- An **increase of 769,049 responses** (due to transfer of FWS Form 3-2405 into this collection and an increase in applications/activity reports due to opening of new refuge lands/fish hatcheries);
- A **decrease of 12,877 burden hours** due to the streamlining of the new permit application (FWS Form 3-2439); and,
- An **increase of \$19,715 in nonhour cost burden** associated with the increased number of applications.

**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. We do not make the information we collect available to the public, except perhaps for final season summaries of the information. We 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. We use harvest and public use data internally for reporting purposes. We do not retain the personal information; it is only necessary to address the safety issues on the day(s) of the visit.

**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 on all forms and websites.

**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.