

**FEDERAL FISH AND WILDLIFE PERMIT APPLICATIONS AND REPORTS – NATIVE
ENDANGERED AND THREATENED SPECIES;
50 CFR 10, 13, AND 17
1018-0094**

Justification for No Material/Nonsubstantive Change

The Service is proposing to separate the existing approved FWS Form 3-200-55 into the following two separate forms:

- Form 3-200-59, *Recovery Permit Application Form*
- Form 3-200-60, *Interstate Commerce Application Form*

In the existing Form 3-200-55, the applicant may have difficulty distinguishing which fields should be completed, and which are relevant to the other permit type. No significant substantive changes are proposed to the forms as a result of splitting Form 3-200-55 into two separate forms. Modifying this form will enable permittees applying for these separate permit types to more efficiently complete the forms, reducing confusion by eliminating text and fields that are not relevant to the type of permit the applicant is seeking. The forms also have been slightly updated and revised to better incorporate and explain the fields necessary to each permit category. Completion of the information on the forms regarding the activity(ies) to be authorized by the permit is required in most cases (under the authority of section 10(a)(1)(A) of the ESA and its implementing regulations at 50 CFR 17).

We request OMB approval to split Form 3-200-55 into the two forms identified to reduce confusion on the respondents. We also request approval to incorporate the two new forms into the new ePermits System expected to go live in September, 2020. The Service does not anticipate any change in the hourly burden on the public for the paper-based submissions. We do estimate a slight burden reduction for submissions via ePermits, a goal of the ePermits initiative, by making easier to complete and submit the form to the Service. The proposed changes would result in a slight reduction of 160 hours in the approved hourly burden only:

Currently Approved:

RECOVERY/INTERSTATE COMMERCE				
<i>Application (Form 3-200-55)</i>				
Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*
Individuals	280	280	3	840
Private Sector	280	280	3	840
Government	80	80	3	240
TOTALS:	640	640		1,920

Proposed Burden Changes:

RECOVERY/INTERSTATE COMMERCE				
<i>Recovery Permit Application (Form 3-200-59)</i>				
Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*
Individuals	70	70	3	210
Private Sector	70	70	3	210
Government	20	20	3	60
<i>Recovery Permit Application (Form 3-200-59) (ePermits)</i>				

Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*
Individuals	70	70	2.5	175
Private Sector	70	70	2.5	175
Government	20	20	2.5	50
Interstate Commerce Permit Application (Form 3-200-60)				
Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*
Individuals	70	70	3	210
Private Sector	70	70	3	210
Government	20	20	3	60
Interstate Commerce Permit Application (Form 3-200-60) (ePermits)				
Requirement	Annual Number of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*
Individuals	70	70	2.5	175
Private Sector	70	70	2.5	175
Government	20	20	2.5	50
PROPOSED BURDEN:	640	640		1,760
CHANGE FROM CURRENT:	0	0		(160)

We plan to incorporate these changes in the upcoming renewal of OMB Control No. 1018-0094 to be submitted to OMB in calendar year 2021 prior to the current expiration date of 03/31/2021.