

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

## **National Wildlife Refuge Special Use Permit Applications and Reports 50 CFR 25, 26, 27, 29, 30, 31, 32, 36 and 43 CFR 5 OMB Control Number 1018-0102**

**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 below listed authorities govern the administration and uses of national wildlife refuges and wetland management districts:

- National Wildlife Refuge System Administration Act of 1966 (Administration Act, 16 U.S.C. 668dd–668ee), as amended by the National Wildlife Refuge System Improvement Act of 1997.
- Refuge Recreation Act of 1962 (Recreation Act, 16 U.S.C. 460k–460k-4).
- Alaska National Interest Lands Conservation Act (ANILCA, 16 U.S.C. 3101 *et seq.*).

The Administration Act consolidated all of the different refuge areas into a single National Wildlife Refuge System (System). It also authorizes us to allow public accommodations, including commercial visitor services, on lands of the 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 it is not inconsistent with, or does not interfere with, the primary purpose(s) of the refuge.

ANILCA provides specific authorization and guidance for the administration and management of national wildlife refuges within the State of Alaska. Its provisions provide for the issuance of permits by the System under certain circumstances. We implement these provisions through 50 CFR sections identified below.

In our general refuge regulations, we provide for public entry for specialized purposes, including economic activities such as the operation of guiding and other visitor services on refuges by concessionaire or cooperators under appropriate contracts or legal agreements or special use permits (50 CFR 25.41, 25.61, 26.36, 27.71, 27.91, 27.97, 29.1, 29.2, 30.11, 31.2, 31.13, 31.14, 31.16, 32.2, 36.31, 36.32, 36.33, 36.37, 36.39, 36.41 and 43 CFR 5). These regulations provide the authorities and procedures for allowing permits on national wildlife refuges and wetland management districts, including those in the State of Alaska.

### **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 likely respondents to this information collection are individuals, businesses, nonprofits, and educational institutions, as well as State/local/Tribal and Federal governments.

We issue special use permits for a specific period as determined by the type and location of the

use or visitor service provided. These permits authorize activities such as:

- Agricultural activities (haying and grazing, 50 CFR 29.1 and 29.2);
- Beneficial management tools that we use to provide the best habitat possible on some refuges (50 CFR 30.11, 31.14, 31.16, and 36.41);
- Special events, group visits and other one-time events (50 CFR 25.41, 25.61, 26.36, and 36.41);
- Recreational visitor service operations (50 CFR 25.41, 25.61 and 36.41);
- Guiding for fishing, hunting, wildlife education, and interpretation (50 CFR 25.41 and 36.41);
- Commercial filming (43 CFR 5, 50 CFR 27.71) and other commercial activities (50 CFR 29.1 and 36.41);
- Building and using cabins to support subsistence or commercial activities (in Alaska) (50 CFR 26.35, and 36.41);
- Research, inventory and monitoring, and other noncommercial activities (50 CFR 26.36 and 36.41).

We use the following three application forms:

- FWS Form 3-1383-G (General Activities Special Use Application).
- FWS Form 3-1383-C (Commercial Activities Special Use Application).
- FWS Form 3-1383-R (Research and Monitoring Special Use Application).

These forms will continue to ensure:

- Applicants are aware of the types of information needed for permit issuance and that the Office of Management and Budget (OMB) approves the collection of this information in accordance with the Paperwork Reduction Act of 1995.
- The requested activities are compatible and appropriate with the purpose(s) for which the refuge was established.
- The eligibility of the applicant (or the most qualified applicant) to receive the special use permit.

We collect the necessary information in form and nonform format (through discussions in person or over the phone, over the Internet, by email, or by letter). In some instances, respondents will be able to provide information verbally. Often, a simple email or letter describing the activity will suffice. For activities (e.g., commercial visitor services, research, etc.) that might have a large impact on refuge resources, we may require applicants to provide more detail on operations, techniques, and locations. Because of the span of activities covered by special use permits and the different management needs and resources at each refuge, we may not require respondents to answer all questions. Depending on the requested activity, refuge managers will have the discretion to ask for less information than appears on the proposed forms. However, refuge managers cannot ask for more or different information. The burden listed in item 12 includes any non-form collection.

Many permittees provide services and facilities to the public. We issue permits for a specific period as determined by the type and location of the use or service provided. We use these permits to ensure that the applicant is aware of: (1) the requirements of the permit and (2) his/her legal rights. Refuge-specific special conditions may be required for the permit. We identify conditions as an addendum to the permit. Most of the special conditions pertain to how a permitted activity may be conducted and do not require the collection of information. However, some special conditions, such as activity reports, before and after site photographs, or data sharing, would qualify as an information collection, and we have included the associated

burden in this information collection request.

We also use form, FWS Form 3-1384, "Bid Sheet – National Wildlife Refuge System" to streamline collection of the necessary pre-award information from applicants during bidding processes to conduct economic uses on Service lands, such as livestock, harvesting hay and stock feed, or removing timber (50 CFR 29.21). This form simplifies the pre-award selection/bidding process for bidders and for refuge staff. The Bid Sheet helps bidders to better understand what information the refuge needs in order to select bids for economic use, and, therefore, reducing the time and burden for the public and Service staff in the pre-award selection bidding process. This form is also easily customizable to the individual economic use being awarded. We use the Commercial Special Use Permit as the actual award document that will outline the terms and conditions of the economic use on Service lands.

<b>For all forms we ask ...</b>	<b>So that we can...</b>
Whether the application is for a new permit or for renewal or modification of an existing permit	Determine the level of information required to process the application.
Signature of applicant and date of application	Determine who provided the information and the date the application was signed.
Full name of applicant (and/or business), organization (and/or business), address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Description of the activity	Determine whether or not an activity is compatible with the purpose of the refuge, the impact on refuge resources, and if special conditions apply.
Names and addresses of assistants/subcontractors/subpermittees	Identify the people involved in the proposed activity.
Activity/site occupancy timeline	Reduce or eliminate scheduling conflicts, anticipate time frame of activity, and manage the long- and short-term impact of site usage.
Frequency of activity	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether an activity is compatible with the purpose of the refuge.
Specific location	Reduce or eliminate scheduling conflicts and manage the long- and short-term impact of site usage.
Map of location	Identify specific location of activity (primarily used for rural activity locations).
If other certifications are required	Determine if an applicant meets all requirements to conduct the activity.
If other Federal, State, or Tribal permits are required.	Determine if an applicant meets all requirements to conduct the activity.
Logistics and transportation details	Determine whether an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Vehicle descriptions and license plate numbers, including those from boats and planes	Confirm that specific vehicles are authorized to be in restricted areas.
Equipment used	Determine whether an activity is compatible

	with the purpose of the refuge and assess the impact on refuge resources.
If overnight stays are required	Determine whether an activity is compatible with the purpose of the refuge, assess the impact on refuge resources, reduce or eliminate scheduling conflicts, and manage the long- and short-term impact of site usage.
Description of onsite or living or working accommodations	Determine whether an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.
Insurance coverage	Determine that an applicant can protect himself/herself and the System from future legal and financial predicaments.
Detailed information on ship-to-shore, intersite, and onsite transportation logistics	Determine whether an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.

<b>For FWS Form 3-1383-G and Form 3-1383-C we ask...</b>	<b>So that we can...</b>
Activity type	Determine if an activity is appropriate to be considered for a special use permit.
Expected number of participants/clients	Assess the impact on refuge resources.
Operational plan	Understand the details of the activity so we can determine whether an activity is compatible with the purpose of the refuge and assess the impact on refuge resources.

<b>For FWS Form 3-1383-C and Form 3-1383-R we ask ...</b>	<b>So that we can...</b>
Safety plan	Determine if appropriate safety measures are in place.

<b>For FWS Form 3-1383-C we ask...</b>	<b>So that we can...</b>
Business tax number	Process payment of fees and charges in accordance with the Debt Collection Improvement Act.
Trip activity timeline	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether an activity is compatible with the purpose of the refuge.
Current or past history of violations of State, Federal, or local laws or regulations related to fish and wildlife.	Assess past compliance with fish and wildlife laws and regulations and determine that the applicant is qualified to undertake the activity.

<b>For FWS Form 3-1383-R we ask...</b>	<b>So that we can...</b>
Affiliation/Sponsoring organization	Verify that the applicant is a bona fide researcher and determine if the applicant is qualified to undertake the activity.
Applicant's relationship to affiliation/sponsoring organization (professor, staff, student, etc.)	Verify that the applicant is a bona fide researcher and determine if applicant is qualified to undertake the activity.

Other cooperators/institutions	Determine whether the project is supported by other entities, verify that the applicant is a bona fide researcher, and determine if applicant is qualified to undertake the activity.
Applicant Curriculum Vitae or Resume	Determine if the applicant is qualified to undertake the activity.
Title and copy of research/monitoring proposal	Assess the scientific rigor of the proposal.
Hypothesis	Determine focus of the project and assess the scientific rigor of the proposal.
Species involved, samples to be taken, and data to be collected, including schedule	Assess the scientific rigor of the proposal, the impact on refuge resources, and determine whether an activity is compatible with the purpose of the refuge.
Details of offsite transportation of samples	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether an activity is compatible with the purpose of the refuge.
Expected benefits of research/monitoring project	Assess the scientific rigor of the proposal and determine the long and short- term impacts on refuge resources.
Project history and relationships to other research/ monitoring projects	Determine the temporal scale of the project and whether the project is supported by other entities,
General timeline for analysis, write-up, and publication	Determine how and when the results of the project will be shared with the scientific/conservation community.
Submission of an Animal Care form, or Institutional Animal Care and Use Committee approval (or equivalent)	Assess the scientific rigor of the proposal and ensure that any animals involved in the project are appropriately cared for.
Details on installation, maintenance, and removal of instrumentation	Reduce or eliminate scheduling conflicts, manage the long- and short-term impact of site usage, and determine whether an activity is compatible with the purpose of the refuge.

<b>For FWS Form 3-1384 we ask...</b>	<b>So that we can ...</b>
Full name of applicant (and/or business), organization (and/or business), address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Business tax number	Process payment of fees and charges in accordance with the Debt Collection Improvement Act.
Current Pesticide Applicator's License and Certified Logger	Determine if an applicant meets all requirements to conduct the activity.
Bid Information	Determine the location and type of activity and compare applications
How the activity meets the objectives of the refuge, including what in-kind services bidder would be willing to provide	Understand the details of the activity so we can assess how the activity would meet the Service's laws and policies for allowing the activity.

Bidder knowledge and experience	Determine if the applicant is qualified to undertake the activity.
List of equipment and personnel	Assess the ability of the bidder to successfully complete the activity.
Contact information from three landowners	Determine if the applicant is qualified to undertake the activity.

## PROPOSED REVISIONS TO THIS INFORMATION COLLECTION

1. With this submission, we propose to add an additional form, Form 3-1383-EZ, *General Activities Special Use Permit Simplified Application*, which is a simplified version of 3-1383-G, General Activities Special Use Permit Application. The intent of this form is to provide a less intimidating and less intensive application for individuals wishing to engage in common, non-economic activities such as recreational berry picking or boat mooring.

We expect this optional “EZ” form will reduce public burden, because, filling out form 3-1383-G, applicants will often consider even questions that are not relevant to them in order to determine whether a response is warranted. Our staff will have the option to offer this form after an initial request is received if the majority of questions on the full 1383-G form are expected to be left blank.

Finally, there are no new questions on this new form. We pulled the questions on the streamlined Form 3-1383-EZ from the currently approved Form 3-1383-G. It simply asks fewer questions than the regular Form 3-1383-G in order to reduce burden on respondents, where appropriate.

2. We are making alterations to the options available to select on question 13a in Form 3-1383-C, Commercial Activities Special Use Permit Application. Some of the existing options are rarely selected and certain types of activity are often entered as “Other.” We are adding some of these common activities in an effort to streamline completion of the form and collection of the activity type.

Specifically, Form 3-1383-C includes an option for mineral lease that is rarely used. We propose to strike that option and add an option for food and beverage vendors such as food trucks. We propose to change “Recreation Events” to “Events” to make it more broadly applicable. We also propose to remove “Cabins” and add “Fishing/Frogging” to cover these types of commercial use.

On Form 3-1383-C, we also propose to modify the wording of question 14 to clarify the requested information. The present wording often leads to an answer which provides only a portion of the timing information that we require. The new question is worded, “Describe the specific dates, times, and frequency of activities. Provide an occupancy timeline showing how the activity is expected to proceed.”

We highlighted the updated fields on the Form 3-1383-C uploaded to ROCIS.

3. Non-substantive changes are being made to Forms 3-1383-G, 3-1383-R, or 3-3-1384; however, we plan to make minor updates to the forms’ layout to improve readability and functionality. The order of questions will be altered to improve the flow, keeping related questions together. In some cases, selection boxes come after an option and in other cases the boxes come before; we will make the presentation consistent. We are also updating the forms to be more consistent with other DOI forms.

**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.**

FWS Forms 3-1383-G, 3-1383-EZ, 3-1383-C, 3-1383-R, and 3-1384 will be available on our agency website in a fillable format. Applicants may print the form and submit it to the appropriate refuge for review and approval by a refuge official. In some instances, applicants may be able to submit the information for Forms 3-1383-G, 3-1383-EZ, 3-1383-C, or 3-1383-R in a non-form format. In many instances, staff complete this form while interviewing individuals who contact the refuge via telephone or in person seeking a permit to perform an activity.

We estimate 20 percent of FWS Form 3-1383-G users will submit their applications in a non-form format or electronically (via email). Few users of FWS Forms 3-1383-C and 3-1383-R will use a non-form format or be able to submit the information electronically. We estimate 100% of users will submit information electronically on Form 3-1384.

When required, we accept electronic submission of activity reports via email.

**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. The information is specific to the applicant, the use or activity proposed, and the refuge where the proposed activity will take place

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

This collection of information does not have a significant impact on a substantial number of small entities. Applicants submit the information for specific needs, and this information is not available from any other source. Small businesses from which we collect information are typically recreational visitor service operations (outfitters/guides), farming operations, commercial filming, and other commercial activities. We collect only the minimum information necessary to establish eligibility, protect resources, and demonstrate that applicants are aware of information they need to know to protect themselves from legal and financial predicaments. As a further means to reduce burden, we will use applicable portions from original applications to process renewals.

**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, we would be unable to review the proposed uses and evaluate the impacts or effects of proposed uses on System lands. This would preclude our ability to fulfill statutory requirements and our responsibilities under the Administration Act, the Recreation Act, ANILCA, and other relevant laws and regulations to determine if the proposed activity or use meets refuge compatibility standards.

We collect the information on either an as-needed basis (one-time or one-season event) or an

annual basis. Some special uses, such as haying and grazing, are beneficial management tools that we use to provide the best habitat possible on some refuges and wetland management districts. We could not accomplish these management objectives without the cooperation and involvement of private individuals.

Special use permits provide us with a legal and binding document authorizing the particular use.

**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.**

There are no circumstances requiring the collection of information in a manner inconsistent with OMB guidelines.

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

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

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

On August 14, 2024, we published in the *Federal Register* ([89 FR 66133](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited



comments for 60 days, ending on October 15, 2024. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-HQ-NWRS-2024-0094](#)) to provide the public with an additional method to submit comments (in addition to the typical U.S. mail submission method). We received the following comments in response to that notice:

**Comment 1:** Electronic comment received on August 14, 2024 via Regulations.gov (FWS-HQ-NWRS-2024-0094-0002) from Jean Publie. The commenter did not address the information collection requirements.

**Agency Response to Comment 1:** No response required.

**Comment 2:** Anonymous electronic comment received on September 1, 2024 via Regulations.gov (FWS-HQ-NWRS-2024-0094-0008). The commenter did not address the information collection requirements.

**Agency Response to Comment 2:** No response required.

**Comment 3:** Anonymous electronic comment received on September 1, 2024 via Regulations.gov (FWS-HQ-NWRS-2024-0094-0009). The commenter did not address the information collection requirements.

**Agency Response to Comment 3:** No response required.

**Comment 4:** Electronic comment received on October 14, 2024 via Regulations.gov (FWS-HQ-NWRS-2024-0094-0010) from WhoPoo App. The commenter did not address the information collection requirements.

**Agency Response to Comment 4:** No response required.

**Comment 5:** Anonymous electronic comment received on September 15, 2024 via Regulations.gov (FWS-HQ-NWRS-2024-0094-0011). The commenter states that FWS policy 620 FW 2.4D describes a cooperative agreement relationship between the Service and agricultural cooperators. This same policy states that Form 3-1383-C must be used to document these agreements. This form is legally insufficient as an instrument by which to administer cooperative agreements as described in the Federal Grant and Cooperative Agreement Act of 1977 (31 U.S.C. 6301–08).

**Agency Response to Comment 5:** The purpose of Form 3-1383-C is not to document financial assistance agreements such as cooperative agreements described in 31 USC 6301–08. Service policy 620 FW 2.2E states that cooperative agriculture agreements are not financial assistance awards and are not subject to the regulations in 2 CFR 200. Certain agricultural uses are permitted on Service property through Form 3-1383-C, as described in this docket. Activities such as cooperative agricultural uses are permitted under the authority described in 16 U.S.C. 668dd, so no further changes to the form will be made as part of this revision.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

**Organization**

**Title**

Wildlife Restoration Partners  
TowboatUS Lake Havasu  
WebWater Development  
SafariTown Surf Shop  
Eastern Washington University  
Grazing Permittee  
Friends of Bill Williams and Havasu Refuges  
Iowa State Univeristy  
Arizona Desert Outfitters

Wildlife Ecologist  
Office Manager  
Operations Manager  
Business Owner  
Professor  
Private Rancher  
President  
Research Associate  
Business Owner

***“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: One respondent stated that the questions seemed legitimate for the protection of wildlife.

Agency Response/Action Taken: The Service aims to only collect information necessary to manage the program while protecting the resource.

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

Comments: Respondents stated that the public burden estimates were either accurate or that their experience was that the form took less time than we had estimated.

Agency Response/Action Taken: We will maintain our burden estimates but also continue working to reduce the time needed to complete an application.

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

Comments: Respondent stated that this is one of the easiest permit applications that they process each year.

Agency Response/Action Taken: We will strive to provide this level of customer service across the National Wildlife Refuge System.

And

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

Comments: One respondent mentioned that some of the questions seemed repetitive. Another respondent mentioned that after the first year’s permit application, it would be nice to have a streamlined one-page renewal form.

Agency Response/Action Taken: For this year’s edits to the form, we have sought to reduce unnecessary or repetitive questions and have introduced a one-page “EZ” version of the application.

Two contacts did not respond to two emails and a follow-up voicemail each. A third verbally declined to participate when contacted by a staff member, in-person.

**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 (National Wildlife Refuge Special Use Permits, FWS-5, May 28, 1999, [64 FR 29055](#); modifications published June 4, 2008 ([73 FR 31877](#)) and March 16, 2023 ([88 FR 16277](#)).

**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 **14,511 responses** totaling **22,495 annual burden hours** for information collection associated with special use permits on national wildlife refuges. We estimate the total dollar value of the annual burden hours for this collection to be **\$1,047,242 (rounded)**.

We used Table 1 of the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-24-1863, September 10, 2024, Employer Costs for Employee Compensation—June 2024, to calculate the total annual burden.

- Individuals – the hourly rate for all workers is listed as \$46.21, including benefits.
- Private Sector – the hourly rate for all workers is listed as \$43.94, including benefits.
- Government – the hourly rate for all workers is listed as \$61.37, including benefits.

We provided a file titled “Attachment A – 1018-0102 Burden Calculations” in ROCIS as supplementary document which details the burden calculations for this collection.

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.

While most commercial use applications require submission of an application fee of between \$50 and \$200 (Forms 3-1383-C), we estimate the average fee per application is \$100. Therefore, we estimate that the annual nonhour cost burden associated with this information collection is **\$370,100** (\$100.00 x 3,701 applications as shown below).

We charge fees for a diverse set of commercial activities. However, not all sites charge an application fee for commercial activities, and not all regions or activities have fee schedules. Individual sites that require an application fee will advertise it on their site-specific permit application instructions which are found on site-specific websites. Most are based on a local market analysis, and in some cases, a bidding process if we need to limit the amount of permits we issue for resource protection purposes.

<b>Commercial Activities Special Use Application (Form 3-1383-C)</b>			
Individuals	797	\$ 100	\$ 79,700
Private Sector	663	100	\$66,300
<b>ePermits - Commercial Activities Special Use Application (Form 3-1383-C)</b>			
Individuals	798	\$ 100	\$ 79,800
Private Sector	663	100	\$66,300
<b>Amendment - Commercial Activities Special Use Application (Form 3-1383-C)</b>			
Individuals	80	\$ 100	\$ 8,000
Private Sector	50	100	5,000
<b>ePermits Amendment - Commercial Activities Special Use Application (Form 3-1383-C)</b>			
Individuals	80	\$ 100	\$ 8,000

Private Sector	50	100	5,000
<b>Renewals – Commercial Activities Special Use Application (Form 3–1383–C)</b>			
Individuals	160	\$ 100	\$ 16,000
Private Sector	100	100	10,000
<b>ePermits Renewals – Commercial Activities Special Use Application (Form 3–1383–C)</b>			
Individuals	160	\$ 100	\$ 16,000
Private Sector	100	100	10,000
<b>TOTALS:</b>	<b>3,701</b>		<b>\$ 370,100</b>

**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 estimated annual cost to the Federal Government to administer this information collection is **\$887,939** (\$872,439 – salaries and \$15,500 – other costs).

**Salary/Benefits: \$872,439** (rounded). We estimate that it will take an average of 1 hour to review and process each application and report, or a total of 14,511 hours. Applications and reports are reviewed at national wildlife refuges in all 50 States, some of which are in locality pay areas.

To determine hourly wage rates, we used the Office of Personnel Management Salary Table [2024-RUS](#) as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.61 in accordance with from BLS [News Release](#) USDL-24-1863.

Position	Grade/ Step	Hourly Pay Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Total Hours	Total Cost (Fully burdened rate x total hours)*
Clerical, unskilled	GS-07/05	\$ 26.62	\$ 42.86	4,352	\$ 186,526.72
Professional/technical staff	GS-11/05	39.40	63.43	8,707	552,285.01
Management (Refuge Mgr.)	GS-13/05	57.16	92.03	1,452	133,627.56
<b>Totals:</b>				<b>14,511</b>	<b>\$ 872,439.29</b>

\* Rounded

**Other Costs: \$15,500** (printing, copying, postage, and overhead (not including employee benefits)).

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

We are reporting a change due to adjustment in agency estimate of -928 annual responses, 686 annual burden hours, and \$32,600 in annual cost burden. We are also reporting a program change due to agency discretion associated with the addition of the new form 3-1383-EZ (described in question 2 above) of 1,536 annual responses and 363 annual burden hours.

**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 will not publish this information. Information collected is strictly for use by refuge staff to determine eligibility for permits.

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

We will display the OMB approval number and expiration date.

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

There are no exceptions to the certification statement.