



June 8, 2026

USGS, Information Collections Clearance Officer
Attention: Antonio Celis-Murillo
12201 Sunrise Valley Drive, MS 159
Reston, VA 20192

Electronically submitted to: <https://www.regulations.gov>

**RE: Revisions to the U.S. Geological Survey's Bird Banding and Marking Application;
Docket No. USGS-2025-0006**

Dear Mr. Celis-Murill:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Revisions to the U.S. Geological Survey's Bird Banding and Marking Application [Docket No. USGS-2025-0006; OMB Control Number 1028-0082; GX25LB00TZ901]. Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

The Department supports the proposed modifications to the current bird banding and marking permit application process, and requests the USGS also consider establishing regulation to authorize a state wildlife agency as an entity, thus acknowledging the agency's role in wildlife management. Specifically, the Department requests the permitting system consider the experience contained within a state wildlife agency, which hires competent and qualified wildlife biologists, rather than the current focus on the experience of an individual entity within the agency. Currently a Bird Banding Laboratory (BBL) permit requires each state wildlife agency employee on the permit to individually demonstrate through a resume their experience working with that species, the trapping techniques, and the marking techniques used. Additionally, a Project Statement must be submitted for any new species or markers for each agency personnel on the project. The current process has created administrative complexities, increases the burden of information collection for both USGS and the state wildlife agency, and lessens the Department's jurisdictional authority to manage wildlife under state statute. Thus, the

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Department requests the USGS consider a system where the permits are issued to the agency (preferably under the Director's name and authorizing the entire agency) irrespective of an individual's experience, recognizing the experience within the Department as an entity, and the jurisdictional authorities of the state wildlife agency in wildlife management as defined in state law. The creation of such a system would reduce the administrative burden on both the USGS and the state wildlife agency, ensuring a smooth administrative process for both agencies.

For example, many state wildlife agencies are tasked with banding a specific number of birds using designated band sizes (e.g. 3,500 MODO bands with Size 3A). Having a permit that covers the entire agency would eliminate challenges that arise when a state wildlife agency oversees multiple programs. Under the current system, a single subpermittee lacks access to all bands issued across different programs to the agency, impeding state wildlife conservation actions. This is especially true for a state wildlife agency that employs numerous professional biologists and conducts numerous banding and marking projects annually. Issuing a permit to the state wildlife agency would streamline efforts and reduce the administrative burden of band management. The Department also recommends establishing a reasonable timeframe for responding to banders when a reported band has not yet been received.

The Department has found the current process for obtaining a permit to be time consuming due to the level of detail required. It has proven to be difficult to maintain a valid permit with the creation and deletion of projects based on the current criteria. The Department has also experienced difficulties when USGS has removed an individuals' authorizations for marking, trapping, deploying transmitters, or sample collecting because of time gaps in conducting such activities. Although some activities may not be practiced regularly, they are still valid techniques that are necessary for conservation of wildlife and may be used when all other techniques have failed.

The Department also requests USGS reconsider the recent criteria change for authorizing any trapping and marking techniques. In the past, the level of detail described above was only necessary for those techniques that might potentially injure birds (e.g. leghold traps) or involve explosives (e.g., cannon nets); it has now been extended to all trapping and marking techniques. This expansion of regulatory authorization has impacted state wildlife agencies and their state authority to manage wildlife by limiting their ability to perform necessary conservation actions if the trapping methods were not previously approved. For example, capture of raptors that have injuries are delayed when the state wildlife agencies have not been successful at capturing the bird with their 'permitted techniques' and need to get additional approval to try another technique to capture the bird. The burden to have all trapping techniques approved impacts wildlife conservation and diminishes the state wildlife agency jurisdiction over wildlife. The Department does not believe this expansion of oversight is justified for techniques that do not harm the animal, and furthers the administrative burden on both the USGS and the state wildlife agency. The Department recommends the USGS revert to the original criteria that only requires this level of scrutiny for those techniques that may potentially injure birds or use explosives.

Finally, the Department recommends improvements be made to the banding portal to enhance user experience and reduce administrative burden. Currently, there is a need for more comprehensive instructional guides for coding and submitting data, especially for birds

associated with multiple codes, such as those involved in disease sampling, auxiliary markers, or banding procedures. Incorporating clearer instructions within the reporting system could help reduce the need for inquiries or clarifications with BBL staff, making the process more efficient.

Thank you for the opportunity to provide input on the Revisions to the U.S. Geological Survey's Bird Banding and Marking Application [Docket No. USGS-2025-0006; OMB Control Number 1028-0082; GX25LB00TZ901]. For further coordination, please contact James Driscoll at jdriscoll@azgfd.gov or 623-236-7581.

Sincerely,

A handwritten signature in cursive script that reads "Allison Haywood".

Allison Haywood
Acting Terrestrial Wildlife Branch Chief

AZGFD #M26-04081202