

**Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 1018-0019**

**American Woodcock Singing Ground Survey
FWS Form 3-156
October 4, 2005**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Fish and Wildlife Service (FWS) is required under the Migratory Bird Treaty Act (16 U.S.C. 703-711) to implement a viable and ongoing program for the protection and conservation of various migratory birds. FWS Form 3-156 (North American Woodcock Singing Ground Survey) is an essential part of the migratory bird management program. The surveys provide the data necessary to determine the population status of the woodcock. In addition, the information is vital in assessing the relative changes in the geographic distribution of the woodcock.

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 Division of Migratory Bird Management (DMBM), Fish and Wildlife Service, uses the information to assess the status of woodcock populations and to develop recommendations for hunting regulations. The Service, State and Provincial conservation agencies, university associates, and other interested parties also use the information for various research and management projects.

State, local, tribal, Provincial, and Federal conservation agencies use FWS Form 3-156 to conduct annual field surveys. Instructions for completing the survey and reporting data are on the reverse of the form. We use observer information (name, telephone number, and mailing address) to contact the observer if questions or concerns arise. All other information is used to aid in processing the survey form. Without information on the population's status, the Service might promulgate hunting regulations that were too liberal thus causing harm to the woodcock population, or too conservative, thus unduly restricting recreational opportunities afforded by woodcock hunting. Another consequence is that the Service would be vulnerable to litigation charging mismanagement and failure to fulfill treaty and other obligations.

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].

The reporting procedure requires the respondent to use pen or pencil to fill out Form 3-156. The respondent can voluntarily submit data electronically to further assist FWS-DMBM personnel with keypunching. Methods used to analyze survey data will be evaluated. Some improvements in precision, accuracy, and general results are expected. However, it is unlikely that the improvements will be substantial enough to allow a reduction in survey coverage. Thus, the burden must be considered minimal at its present level.

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.

No special efforts have been made to identify duplication. Within the Federal Government, DMBM is the sole organizational unit charged with monitoring the population status of migratory gamebirds. Also, the realm of migratory bird management is sufficiently small that if similar sources of information were available or even possible, DMBM would be aware of them.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

We have no knowledge of the survey's impact on small businesses or other small entities. The Singing Ground Survey is unique in the United States and Canada. The Canadian Wildlife Service, Provinces, and States rely on the Fish and Wildlife Service to administer and coordinate this survey.

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.

Migratory gamebird populations are dynamic. They can change annually in status and size and frequently do. For this reason, the promulgation of hunting regulations has traditionally been an annual activity, and, thus, annual assessments of the population status of the more important species, including woodcock, are desirable. The consequences of conducting the survey less frequently than annually are the same as given under item 2.

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 would require this collection to be conducted in a manner inconsistent with OMB guidelines mentioned above.

- 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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 May 12th, 2005, we published in the Federal Register (70 FR 25107) a notice of our intent to request that OMB renew authority for this information collection. In that notice, we solicited public comments for 60 days, ending July 11th, 2005. We received one comment during that period. The commenter expressed opposition to hunting, but did not address the collection requirements. We have not made any changes to the information collection as a result of this comment. In addition, we meet with representatives from States and Provinces within each unit annually to discuss survey procedures and results. Such persons are listed below. Individual cooperators also have the opportunity to express concerns directly by including notes or letters with Form 3-156.

Dan McAuley, USGS, Patuxent Research Station, 5768 S Annex A, Orono, ME 04469.
dan_mcauley@usgs.gov

Tom Engel, MN DNR Wildlife, 1201 E Hwy 2, Grand Rapids, MN 55744.
tom.engel@dnr.state.mn.us. 218-999-7936

Lori Wolff, USFWS, Private Lands Office. 434 Great Oak Drive, St. Cloud, MN 56387.
lori_wolff@fws.gov. 320-253-4682

Steve Maxson, MN DNR Wildlife, Waterfowl Research. Bemidji, MN 56601.
Steve.masxon@dnr.state.mn.us. 218-999-7933

Mike Olinde, Louisiana DW&F. PO Box 98000 Baton Rouge, LA 70898.
molinde@wlf.louisiana.gov. 225-765-2355.

Randy Hicks, Environmental Conservation, Environment Canada. PO Box 6227 Sackville, NB
Canada E4L 1G6. randy.hicks@EC.GC.CA (506) 364-5041

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.

Names, addresses, and phone numbers are the only personal information obtained from survey cooperators. Our compliance with the Privacy Act assures confidentiality. Cooperators are apprised of the Act.

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.

No sensitive questions are asked.

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 in Item 13 of OMB Form 83-I.**
- * 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. Instead, this cost should be included in Item 14.**

Conducting the survey itself is either required by the respondent's agency, or completely voluntary and done because the respondent desired to help. Approximately 750 cooperators submit forms once a year. It takes 5 minutes to read the instructions and map, 30 minutes to run the route and an additional 5 minutes to complete the form and mail it for a total of 0.67 hours (40/60). We estimate 70% of cooperators will voluntarily choose to submit data electronically, which adds an additional 8 minutes for a total of 0.8 hours (48/60). The total estimated burden is 570.75 hours $[(750 \times .70)0.8 + (750 \times .30)0.67]$. The estimated total dollar value of hours is \$11985.75.

Without electronic submission (~30% of cooperators)

Read instructions & map	05 minutes	
Run route	30 minutes	
Complete form & mail	05 minutes	
Individual	40 minutes	40/60=0.67 hrs
# of Cooperators		(750 x 0.30)
		x 0.67
Total hrs (30%)		150.75

With electronic submission (~70% of cooperators)

Read instructions & map	05 minutes	
Run route	30 minutes	
Complete form & mail	05 minutes	
electronic submission	08 minutes	
Individual	48 minutes	48/60=0.8 hrs

# of Cooperators	(750 x 0.70)
	x <u>0.8</u>
Total hrs (70%)	420.0
Total hrs	(150.75 + 420.0) = 570.75
Total \$ value of hours	(570.75 x \$21.00/hr) = \$11985.75

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 shown in Items 12 and 14).

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

There are no estimated annualized nonhour dollar costs or burdens to the public.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a

single table.

Materials and forms	\$600
Postage	\$330
Salaries	\$9,829
Total	\$10,759

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The percentage of cooperators using electronic submission has increased 30 percent over the past 3 years, thus increasing the total burden hours by 44.

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.

Analytical techniques are in the annual American Woodcock Population Status Report under METHODS.

Form 3-156 sent to cooperators	Early spring
Survey	April - May
Collection of forms	April - May
Data analysis	May
Report writing	May-June
Publication date	June
Service Regulations Committee Meeting (recommendations on hunting season)	late June

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

We will display the OMB control number and expiration date..

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The respondent universe is the number of 10' blocks in the North-Eastern United States and South-Eastern Canada. From 1965-1970, these blocks were enumerated and a random sample was selected such that each route represents roughly 750 mi² of land area. The response rate is approximately 95 percent because some circumstances prevent all requested routes from being run each year. To improve efficiency, "constant-zero" routes are run once every 5 years instead of every year.

2. Describe the procedures for the collection of information including:

- * **Statistical methodology for stratification and sample selection,**
- * **Estimation procedure,**
- * **Degree of accuracy needed for the purpose described in the justification,**
- * **Unusual problems requiring specialized sampling procedures, and**
- * **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

For descriptions of statistical methods, see the attached status report, Kelley, J.R., Jr and R. D Rau. 2005. American woodcock population status, 2005. U.S. Fish and Wildlife Service, Laurel, Maryland. pps. 1-3 and Sauer, J.R., and J.B. Bortner. 1991. Population trends from the American woodcock singing ground survey, 1970-88. Journal of Wildlife Management 55:300-312.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

We use phone contacts and a system of state coordinators to maximize timely response.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

We have improved and refined the Singing Ground Survey methodology over the last 38 years.

Future improvements and modifications are likely to be minor as improvements have reached the point of diminishing returns.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Statistical consultants:

John Sauer	(301) 497-5662
Bill Kendall	(301) 497-5868

Persons collecting and analyzing data:

Rebecca Rau	(301) 497-5862
Bill Kendall	(301) 497-5868