

Supporting Statement for Paperwork Reduction Act Submission

OMB Control Number 1018-0023

Sandhill Crane Harvest Survey
Form number 3-2056N
July 2004

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 of the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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.

Cooperative management guidelines for mid-continent sandhill cranes (included are three currently recognized subspecies: lesser, Grus canadensis Canadensis; Canadian, G. c. rowani; and greater, G. c. tabida) are aimed at providing optimum diverse recreational opportunity consistent with the welfare of the species and within the provisions of international treaties and socio-economic constraints. Under requirements of the Migratory Bird Treaty Act (16 U.S.C. 703-712) and the Fish and Wildlife Act of 1956 (16 U.S.C. 742d), the Department of the Interior is designated as a key agency responsible for the wise management of migratory bird populations frequenting the U.S. and for the setting of hunting regulations that allow appropriate harvests that are within the guidelines that will allow for the populations' well-being. These responsibilities dictate the gathering of accurate data on various characteristics of migratory bird harvests of a temporal and geographic nature. Knowledge attained by determining harvest and harvest rate of cranes is used to regulate populations (to promulgate hunting regulations) and to encourage hunting opportunity, especially where crop depredations are chronic and/or lightly harvested flocks occur.

Beginning in 1960 and continuing to date, hunting seasons have been allowed for sandhill cranes in all or part of eight Midwestern States (Colorado, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming) during specified time periods. In addition, a sandhill crane hunting season has been allowed in Kansas since 1993. Prior to the initiation of the sandhill crane harvest questionnaire in 1975, little information was available on the number of individuals who annually hunt sandhill cranes or the number of cranes harvested. This lack of information represented one of the major voids in management of the species. Annual crane hunter activity and harvest information were readily available for Canada through uniform nationwide surveys conducted by the Canadian Federal Government. Lack of comparable information from the United States precluded ascertaining the total annual hunter harvest from this migratory bird resource shared by the two countries.

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.]

Since initiation of the questionnaire survey, it has been possible to annually estimate the magnitude, geographical distribution, and temporal distribution of the sandhill crane harvest. It has also been possible for us to estimate the portion of the sandhill crane's total population that is taken during harvest. This information has been particularly useful in determining the effects on harvests of daily bag limits and changes in hunting dates and the areas (counties) of States open to hunting. Based on information from the U.S. and Canadian surveys, hunting regulations can be adjusted as needed to optimize harvest at levels that provide a maximum of hunting recreation while keeping populations at desired levels. Agencies participating in determining appropriate sandhill crane hunting regulations, and making use of survey results, include the Department of the Interior, the Canadian Wildlife Service, State conservation agencies, and various private conservation organizations.

On the survey form 3-2056N (which is the only survey form we intend to use in the future, as explained below), we ask hunters to identify the following information:

- Whether or not they hunted sandhill cranes this season. We need this information to estimate the number of active crane hunters.
- If they did hunt cranes, we ask for:
 - Month and day of hunt, because this provides information on the temporal distribution of the harvest that enables us to evaluate the effects of hunting season dates on harvest;
 - County and State of hunt, because this enables us to estimate the geographic distribution of the harvest;
 - Number of birds bagged, because this provides us with information on daily hunting success that enables us to evaluate the impacts of daily bag limits on harvest; and
 - Season totals (days hunted, birds bagged, and birds knocked down but not retrieved), because this allows people who do not record their daily hunts to still provide us with data that enable us to estimate total days of hunting, total harvest,

and mortality due to crippling loss.

In the past, the Service has used three forms for this survey: The original sandhill crane harvest questionnaire form (Form Number 3-530), follow-up questionnaire form (Form Number 3-530A), and a newer, machine-scannable sandhill crane harvest survey form (Form Number 3-2056N). The newer 3-2056N survey form design consists of a personalized cover letter that is signed by the Chief of the Division of Migratory Bird Management and attached to the survey form. The cover letter, survey form, and a postage-paid return envelope are mailed in an envelope bearing the Service's logo, rather than the mailer format that the original and follow-up questionnaire forms (3-530 and 3-530A, respectively) employ. The personalized cover letter, the postage-paid return envelope, and the Service logo on the mailing envelope are all designed to improve response rates.

To compare results from the forms, we used the new Form 3-2056N concurrently with Forms 3-530 and 3-530A last year in three States: North Dakota, Colorado, and Texas. For this comparison, half of the sampled hunters in those States received Form Numbers 3-530 and 3-530A, and the other half received Form Number 3-2056N. Results obtained from the two forms were similar, except that response rates were higher for the new form (76% compared to 70% for North Dakota, 74% versus 62% for Colorado, and 57% versus 50% for Texas). Therefore, we plan to discontinue use of Forms 3-530 and 3-530A and begin exclusive (and permanent) use of Form 3-2056N.

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.].

Respondents are randomly selected migratory bird hunters who are asked to voluntarily participate in a season-long survey. If we put the season-long survey forms online, we might receive responses from people who were not randomly selected for the survey. This would invalidate (i.e., bias) our survey results and complicate our efforts to obtain reliable harvest information to use in setting sandhill crane hunting regulations. Thus, this information collection does not involve the use of technological collection techniques at this time. However, as new electronic survey methodologies are developed and tested, we will strongly consider any that are appropriate for this survey. The burden currently placed on cooperators and the cost to the Federal government is thought to be at a minimum level consistent with the information required.

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.

As a result of close cooperation and frequent meetings between the Department of the Interior and conservation agencies in States with crane seasons, potential duplications in data collection

are discussed and avoided. No other harvest survey provides uniform information on sandhill crane hunting activity and harvest. Some States conduct surveys providing some of this information; however, the data are not comparable among States and therefore not additive. Other States have no crane harvest information whatsoever.

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.

This collection does not significantly impact small entities. The brief survey is completed voluntarily by individual hunters.

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.

If the survey was not conducted, adequate data would not be available for making decisions of a regulatory nature. Not having this ability could adversely affect crane populations due to over-harvest. In addition, crane harvests that are not adjusted yearly could possibly cause an under-harvest situation which, in turn, could cause crop depredation on private land. The health and well-being of the population demand that harvests be commensurate with population size. Finally, if this survey was not conducted, the lack of an accurate assessment of harvest would logically dictate restrictive regulations, with a loss in hunting recreation due to only vague knowledge of effects of hunting on crane populations and fear of possible over-harvest.

Because the sandhill crane harvest can vary considerably from year to year depending on weather, water conditions, food availability, and reproductive success, it is necessary to collect harvest information on an annual basis. Harvest can vary by as much as 100% by State from year-to-year. The harvest is such that the annual take is fairly close to the recommended level, which dictates an annual scrutiny as to whether additional hunting opportunity should be allowed. The annual harvest recommendation will be based on the previous year's harvest, therefore it behooves us to conduct the survey on 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.

There are no special circumstances that require the collection to be conducted 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. [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 March 29, 2004, we published in the **Federal Register** (69 FR 16282) a notice soliciting public comment on this information collection for 60 days, ending May 28, 2004. By that date, we did not receive any comments in response to the notice.

Through regular meetings between the Department of the Interior and the Technical Committee of the Central Flyway Council, an organization of wildlife conservation professionals from States making up the Flyway, data collection needs and procedures are fully discussed and agreed upon. Below are the representatives consulted in 2002 from States having a crane hunting season:

Jim Gammonly, Colorado Division of Wildlife	970/484-2836
Helen Hands, Kansas Department of Wildlife & Parks	316/793-3066
Jim Hansen, Montana Department of Fish, Wildlife, & Parks	406/247-2957

Tim Mitchusson, New Mexico Department Game & Fish	505/835-0900
Stan C. Kohn, North Dakota Game & Fish Department	701/328-6339
Michael E. O'Melia, Oklahoma Department of Wildlife Conservation	405/521-3563
Spencer Vaa, South Dakota Game, Fish, & Parks Department	605/688-4786
Jay Roberson, Texas Parks & Wildlife Department	512/389-8011
Larry Roberts, Wyoming Game & Fish Department	307/473-3412

In addition, we solicited comments from the survey participants listed below. Each of them stated that the instructions they received with the survey were straightforward and easy to understand, and each agreed that our estimates of time burden were accurate.

Mr. Marion Kinder
1001 S 14th Street
Lamar, CO 81052
tel: (719) 336-5435

Mr. Gary Wright
1006 Hardage Lane
Colleyville, TX 76034
tel: (817) 329-5312

Mr. Greg Kolstad
2768 71st Avenue NE
Sheyenne, ND 58374
tel: (701) 996-2282

Mr. George Secor
5 Vista Road
Englewood, CO 80113
tel: (303) 762-9679

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Each hunter contacted receives an assurance that the survey is conducted in accordance with the Privacy Act of 1974. Hunters are not asked to write their names on the questionnaires and are assured that neither their names nor any other unique personal identifiers will be associated with

their questionnaires.

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.

The survey contains no 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 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.

Recent Service experience indicates that about 7,500 hunters will respond to the questionnaire each year. This is an increase of 1,000 respondents for this information collection over the number estimated in the current information collection budget. The frequency of response is once annually. It will take an average of 5 minutes (0.083 hours) for a respondent to fill out the questionnaire. Thus, the total annual burden estimate for this survey is 625 hours. Assuming an hourly cost of \$8.00, this amounts to a total dollar value of the annual burden hours of \$5,000.

Number of respondents	Number of responses annually	Average time required per response	Total annual burden hours	Total annual dollar value of burden hours (@ \$8.00/hour)
7,500	1	5 minutes	625 hours	\$5,000

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 is no non-hour dollar cost burden to respondents; there is no fee for completing the survey or any other costs associated with responding to this survey. The survey is even accompanied by a postage-paid return envelope.

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.

The estimated total annual cost to the Federal Government is \$40,000, as detailed below. Estimates are based on current experience with the survey.

Activity	Hours required	Total cost of activity
Coordination with State agencies	4	\$100
Preparation of justification and securing clearance	12	\$400
Printing survey forms (contracted)	0	\$9,500
Mail costs, distributing forms, postage	0	\$15,500
Coding and keypunching of name/addresses and questionnaires	100	\$2,500
Computer (hardware) costs and programming. This includes partial costs of maintenance contracts for capital equipment, including a hand-print scanning system, a high volume printer, and automated mailing equipment	5	\$6,500
Analysis of data and report preparation (partially contracted)	20	\$5,500
TOTALS	141	\$40,000

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

The increase in the hour burden estimate is an adjustment, resulting from increases in the number of permits issued in some States and increases in response rates for some States.

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.

Participating States issue permits to sandhill crane hunters in mid-July. Copies of issued permits (showing names and addresses of permittees) are mailed to the Division of Migratory Bird Management, Laurel, Maryland, following the end of the crane hunting season in each State. Upon receipt of name and address cards, computer records of each name/address are produced, and data-mailers containing the questionnaire are computer-addressed and mailed. These questionnaires are mailed to permittees approximately five weeks after the close of the respective hunting season. A follow-up questionnaire is mailed to non-respondents approximately one month later. In recent years, the latest crane season has closed in early February. Thus distribution of follow-up forms is completed in early April and the analysis of data commences

about early May. An annual report is available by August on our website:
<http://migratorybirds.fws.gov>

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 expiration date for OMB approval on the survey forms.

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

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the OMB Form 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

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 sampling universe may vary from year to year. The following information is based on the 2003-04 hunting season. The universe for sampling is approximately 58,600 individuals who obtain an annual permit to hunt sandhill cranes. Sampling is according to States, with 15% of the permittees randomly selected to receive questionnaires in Texas, 20% of the permittees selected in Colorado and North Dakota, and 50% of the permittees contacted in all other States except Montana and Wyoming. All permittees in Montana and Wyoming are contacted because of the low number of permits issued in those States. Below are data from the 2003-04 survey giving pertinent sampling characteristics by State.

State	No. of permittees	No. contacted	No. of responses	Response rate
Colorado	5,854	1,389	941	68%
Kansas	1,206	583	389	67%
Montana	273	253	216	85%
New Mexico	471	224	132	59%
North Dakota	6,030	1,499	1,097	73%
Oklahoma	1,000	628	358	57%
South Dakota	563	268	220	82%
Texas	43,199	7,815	4,199	54%
Wyoming	50	48	40	83%
Total	58,646	12,707	7,592	60%

Please note: Our response to question B3 provides information on our continuing efforts to improve the response rates listed above.

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.

Sampling is stratified according to State of permit issuance; sampling rates vary from 15% in States with many crane permittees (Texas, North Dakota) to 100% in States with few crane permittees (e.g., Montana, Wyoming). No specialized sampling procedures are required, and we use the standard estimation methods for stratified random samples. Stratum-specific (State-specific) estimates of the proportion of permittees that actually hunted cranes, the mean number of days hunted, and the mean number of cranes harvested are derived from the responses. Those estimates are expanded by N (number of permits issued) for each State to obtain State totals, which are then combined to provide estimates of the number of active crane hunters, days of hunting, and cranes harvested for all mid-continent sandhill crane hunting in the U.S. The 95% confidence interval for the annual harvest estimate is about $\pm 5\%$, which is a precision level that is adequate to ensure responsible harvest management (i.e., hunting regulations) decisions.

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.

Survey recipients are provided postage-paid, business-reply envelopes for returning their completed survey forms. A follow-up questionnaire is mailed to those hunters who did not respond to the first questionnaire. In accordance with a directive from OMB, we sent some of the people selected to participate in the survey a letter, signed by the FWS Director, urging them to complete the survey. A copy of the letter is attached. The letter was sent to all those selected from the States with low response rates: Texas, Oklahoma, New Mexico, Colorado, and Kansas. It was mailed one to two weeks in advance of the survey itself. The letter appears to have had a small positive effect on response rates, but not enough to raise them to levels acceptable to OMB. Therefore, starting with the coming season, we will add another follow-up mailing to further increase response rates.

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.

An additional follow-up mailing will enable us to identify three response waves (one for each survey mailing). We will use regression techniques to determine whether significant changes in vital estimates (active hunters, cranes bagged) occur across response waves, thus indicating a potential for non-response bias, and if so, the magnitude of any bias that we detect. This will enable us to correct the results of the survey for non-response bias if necessary.

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.

The individual directly responsible for information collection and analysis is: Elwood M. Martin, Wildlife Biologist, Harvest Surveys Section, Division of Migratory Bird Management, 10815 Loblolly Pine Drive, Laurel, MD 20708-4028 (301/497-5980).