



Grey, Hope <hope_grey@fws.gov>

Fw: Comments and request for information regarding ``1018-0102''

1 message

Jay H <mci1830@yahoo.com>

Mon, Mar 3, 2014 at 7:25 PM

Reply-To: Jay H <mci1830@yahoo.com>

To: "hope_grey@fws.gov" <hope_grey@fws.gov>

I am responding to the DOI's notice regarding the issuance of permits and the collection of data for the forms listed (see <http://www.fws.gov/policy/library/2013/2013-27149.html>).

I would like to request information regarding this action both for the present and future rule making activities for the FWS in regards to 50 CFR Part 29.

My comment(s) are as follows:

1) The inclusion of 50 CFR 29.2 would appear improper. 50 CFR 29.2 is in regards to "Cooperative Agreements", this is not a permitting process but rather a Grants and Financial Assistance process (see Service Manual Parts 515 thru 529; specifically 515 FW 1). The use of Form 3-2459 or similar form for a Grant (Cooperative Agreement) would be more correct, the use of a permit would be improper considering the Federal Grant and Cooperative Agreement Act (1977). Few (if any) current and past cooperative agreements regarding part 29.2 have not been executed with any of the forms listed in the notice.

2) The use of permits for Economic Use privileges would appear appropriate for 50 CFR 29.1 wherein it is clear this section is for economic (for profit) use in contrast to 50 CFR 29.2 where it is clear it is for a non-profit "cooperative agreement" use.

Thank you for your consideration and my contact information is:

Jay Hymas
PO Box 4234
Pasco, WA 99302
email: mci1830@yahoo.com

Sincerely,

Jay Hymas