

[EXTERNAL] OMB Control Number 1019-0088 (Comment)

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To: Info\_Coll, FWHQ <info\_coll@fws.gov>

Cc: wlp\_admin@friendsofanimals.org <wlp\_admin@friendsofanimals.org>

 1 attachments (184 KB)

FoA\_FHWA Comment.pdf;

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Dear Ms. Baucum,

Please see the attached file for Friends of Animals' comment on the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWA).

Thank you for your time.

Sincerely,

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July 10, 2020

**Via USPS Mail**



Madonna L. Baucum  
Service Information Collection and Clearance Officer  
U.S. Fish and Wildlife Service  
MS: PRB (JAO/3W)  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

**Re: National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, OMB  
Control Number 1018-0088**

Dear Ms. Baucum,

Friends of Animals<sup>1</sup> submits these comments in response to notice of information collection relating to the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWAR). The Fish and Wildlife Service (FWS) conducts this survey about every five years to gauge the level of participation in various statutorily authorized activities. Due to the trend of decreasing participation in hunting, these surveys remain more important than ever in properly allocating federal funding.

Only through clear, accurate information can FWS provide funds and focus in proportion to the activities Americans are actually participating in. Americans' views on many things, like hunting and fishing, are evolving over time. National surveys provide FWS and other agencies the vital information they need to determine what is best for our country and its citizens.

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<sup>1</sup> Friends of Animals is a non-profit international advocacy organization incorporated in the state of New York since 1957. Friends of Animals has nearly 200,000 members worldwide. Friends of Animals and its members seek to free animals from cruelty and exploitation around the world, and to promote a respectful view of non-human, free-living and domestic animals.

## DISCUSSION

### 1. THE COLLECTION OF INFORMATION IS NECESSARY FOR THE PROPER PERFORMANCE OF FWS

#### a. Collection of Information is Necessary for Proper Distribution of Funds

FWS distributes federal funds based on multiple pieces of federal legislation. Foremost among the sources of funds are the Dingell-Johnson Sport Fish Restoration Act and the Pittman-Robertson Wildlife Restoration Act.<sup>2</sup>

As past surveys have demonstrated, fewer and fewer people are hunting. This means a shrinking of the revenue distributed. FWS and other agencies may have to look for other sources of funding, such as non-consumptive users of wildlife.

While the states are ultimately responsible for the disposition of these funds, FWS still has significant leeway in deciding how to promote various wildlife activities. For example, FWS has expanded hunting access on National Wildlife Refuges three times in the last four years.<sup>3</sup> Thus, both “Federal and State agencies use information from the survey to make policy decisions.”<sup>4</sup>

#### b. Collection of Information is Necessary for Proper Emphasis of Activities

These surveys provide one of the only opportunities for a national-level look at what activities Americans support. If surveys continuously show a decrease in participation in a given activity, FWS and other agencies should take these trends into consideration. For example, the 2016 survey demonstrated that seven times more Americans participate in wildlife observation and photography than hunting. Yet, we see gross increases in hunting opportunities, not wildlife observation or photography opportunities. FWS and state agencies should be using these surveys to assess “future needs and demands” instead of propping up interest in waning activities.

The practical utility of these surveys mostly involves this matching up of participation and focus of wildlife activities. FWS’ main goal of collecting information from these surveys should be to match up their activities with the new data. If more and more people are

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<sup>2</sup> 16 U.S.C. 777–777m; 16 U.S.C. 669–669i.

<sup>3</sup> U.S. Fish & Wildlife Service, *Secretary Bernhardt proposes historic expansion of hunting and fishing opportunities*, <https://www.fws.gov/southeast/news/2020/04/secretary-bernhardt-proposes-historic-expansion-of-hunting-and-fishing-opportunities/>.

<sup>4</sup> Agency Information Collection Activities; National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWAR), 85 Fed. Reg. 28972 (May 14, 2020).

hunting, expansion of hunting activities might be appropriate. If fewer people are doing so, it makes sense for FWS to focus on other activities.

### **CONCLUSION**

In conclusion, Friends of Animals appreciates the hard work FWS does to conduct these national surveys. The surveys bring to light valuable information that must be considered when distributing funds to state wildlife agencies.

Sincerely,

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