

## PUBLIC SUBMISSION

## Comment from Friends of Animals

Posted by the **Fish and Wildlife Service** on Jun 23, 2022

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FWS-HQ-WSFR-2022-0035-0002

**Tracking Number**

I4s-mmsl-d2v6

**Document Subtype**

Comment(s)

**Received Date**

Jun 23, 2022

**Page Count**

1

June 24, 2022

**Via Internet (Regulations.Gov) and Email  
(Info\_Coll@fws.gov)**

~~EXPLORERS~~  
**FRIENDS  
of ANIMALS**

Madonna L. Baicum  
Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
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**Re: National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWAR), FWS-HQ-WSFR-2022-0035, OMB Control Number 1018-0088**

Dear Ms. Baicum,

Friends of Animals<sup>1</sup> submits these comments in response to the notice of information collection relating to the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWAR).<sup>2</sup> U.S. Fish and Wildlife Service (FWS) conducts this survey about every five years to gauge the level of participation in various statutorily authorized activities. Friends of Animals recognizes and applauds the shift in FWS's focus to include non-consumptive users of wildlife, who have traditionally been left out of opportunities to fund conservation.

As State and Federal efforts fail to prop up the declining number of Americans who hunt, FWS should involve more actions like this one to rely on Americans who have been left out of the "killer pays" system currently in place. To them, conservation does not just mean hunting or fishing, and FWS should take actions toward providing opportunities for these non-consumptive uses of our fish and wildlife.

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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 animals, both free-living and domestic animals.

<sup>2</sup> U.S. Fish and Wildlife Service; Agency Information Collection Activities; National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (FHWAR), 87 Fed. Reg. 24584 (Apr. 26, 2022).

## DISCUSSION

### 1. The Collection of This Information Is Necessary for the Proper Performance of FWS.

#### a. FWS should distribute funds to various wildlife activities based on the number of Americans who participate, including non-consumptive birdwatching.

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>3</sup> Past surveys have shown a continually declining number of Americans (both in absolute numbers and as a percentage of Americans) who decide to hunt. This means a shrinking of the revenue distributed. While Friends of Animals understands that, historically, revenue from mandatory hunting licenses have gone to fund conservation, that time is ending. FWS should recognize this sea change in our society, and plan for its future revenue needs accordingly.

Friends of Animals is sympathetic that FWS's main source of funding is drying up as fewer people decide to kill animals for fun. FWS and other agencies should look for other sources of funding, including the promotion of various non-consumptive wildlife activities. To that end, Friends of Animals applauds FWS's efforts to include birdwatching Americans in this latest wildlife survey.

#### b. FWS should emphasize activities based on the amount of people who participate, and allow non-consumptive users to contribute money through means other than hunting or fishing.

These surveys provide one of the only opportunities for a national-level look at how many Americans hunt, fish, or appreciate wildlife in non-violent ways. The 2016 survey demonstrated that seven times more Americans participate in wildlife observation (including birdwatching) and photography than hunting. Yet, we only see sustained increases in hunting opportunities, not wildlife observation or photography opportunities.

This is partially why Friends of Animals supports FWS's efforts to broaden the range of people who they will allow to contribute to conservation. In particular, people who passively appreciate nature, without killing its inhabitants for sport, should be allowed to participate. By FWS's own measures, there are far more people who do not hunt. FWS should use this survey to re-organize its approach to funding conservation.

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<sup>3</sup> 16 U.S.C. 777-777m; 16 U.S.C. 669-669i.

As recent examples in Colorado have shown, revenue from non-consumptive users can still qualify toward the same federal funding as hunting licenses.<sup>4</sup> Just because hunting licenses have been a main source of revenue in the past does not guarantee that they will continue to be this main source. In fact, it is crystal clear from FWS's surveys that this population is shrinking in the United States. Instead of blindly clinging to tradition, FWS should continue to reach out to new groups of Americans who will gladly support conservation—as long as they do not have to kill an animal to do so.

## **2. Accuracy of the Survey Should Require that Birdwatching Questions be Posed in All Three Waves.**

In order to achieve the most accurate survey results, the same set of questions should be posed to all respondents. Otherwise, people may have answers to questions that are not asked of them.

Here, FWS has not explained why birdwatching information will only be solicited in Wave 3 (out of 1 screener and 3 waves). FWS expects a total of 220,558 household responses. Yet, Wave 3—the only Wave in which birdwatching questions will be posed—will only involve an expected response of 59,534.<sup>5</sup> This means that only 27% of people included in the survey have the opportunity to mention birdwatching.

Why is FWS limiting this information collection in such a way? It would seem more reasonable to ask **every** respondent about this activity, in the same way that every respondent will be asked about hunting or fishing. Part of a survey's statistical power lies in a large sample size. The larger the sample size, the more accurate a survey will be.

For this survey, FWS is already selecting a small sample size: 220,000 out of a nation with 330,000,000. Thus, the survey is interviewing approximately 0.0006% of Americans, yet the current methodology would reduce that even further. The questions asked in this survey should apply to everyone in a fair and legitimate manner. This is especially true given the additional nonhour burden expected from this birdwatching amendment: none. Thus, it should be easy and not a burden to include these questions in all three Waves.

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<sup>4</sup> Out There Colorado, *New state wildlife-area pass approved by Colorado Parks and Wildlife*, [https://www.outtherecolorado.com/news/new-state-wildlife-area-pass-approved-by-colorado-parks-and-wildlife/article\\_c32d796c-8c05-11eb-bba7-d7d703fa388e.html](https://www.outtherecolorado.com/news/new-state-wildlife-area-pass-approved-by-colorado-parks-and-wildlife/article_c32d796c-8c05-11eb-bba7-d7d703fa388e.html) (Mar. 23, 2021).

<sup>5</sup> 87 Fed. Reg. at 24585.

## CONCLUSION

The National Survey of Fishing, Hunting, and Wildlife-Associated Recreation remains an important way, and perhaps the only, for FWS and the nation to get a clear picture of participation in those activities. Friends of Animals commends FWS for finally including questions about birdwatching. Non-consumptive users greatly outnumber those who hunt and fish in this country. And while it is true that “hunters’ and anglers’ funds” have contributed to conservation, most of that conservation involved—and still involves—expanding opportunities for those individuals to kill. Furthermore, non-hunters and non-fishers have simply had no opportunity to contribute, unless they wanted to buy a hunting or fishing license to stock the land with more animals who would be killed.

Your sole source of funding is slowly dying. Look at the numbers that your own surveys and statistics about hunting licenses show. FWS must adapt to a larger, non-consumptive audience instead of promoting and propping up this increasingly unpopular form of recreational killing. Including birdwatchers is a first step, but still insufficient. FWS needs to stop focusing on expanding hunting and fishing opportunities, as if they will always be there as the sole revenue source. FWS should start actually protecting fish and wildlife, instead of making more rules and regulations for their continued slaughter.

Sincerely,

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