

The Ornithological Council



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ABOUT BIRDS

Association of Field Ornithologists

Birds Caribbean

CIPAMEX: Sociedad para el Estudio y
Conservación de las Aves en México

Neotropical Ornithological Society

North American Crane Working Group

Pacific Seabird Group

Raptor Research Foundation

Waterbird Society

Wilson Ornithological Society

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June 14, 2023

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

Re: Docket No. FWS-HQ-MB-2022-0056, OMB Control
Number 1018-0022

Submitted via www.reginfo.gov and via email to Info_Coll@fws.gov

The Ornithological Council is a consortium of scientific societies of ornithologists; these societies span the Western Hemisphere and the research conducted by their members spans the globe. Their cumulative expertise comprises the knowledge that is fundamental and essential to science-based bird conservation and management.

We appreciate the opportunity to submit additional comments on Docket No. FWS-HQ-MB-2022-0056, the U.S. Fish and Wildlife Service's request to renew their information collection for permits under the Migratory Bird Treaty Act (MBTA). Many of the ornithologists who are members of the organizations that make up the Ornithological Council must secure MBTA permits from the USFWS, either regularly or from time to time during their career. Given this, ensuring that the process of applying for, renewing, and amending MBTA permits is efficient and predictable is of the utmost concern to the Ornithological Council. We appreciate the willingness of the USFWS Migratory Birds Program to work with us over the years to ensure that these permits meet the needs of both the ornithologists on the ground and the agency.

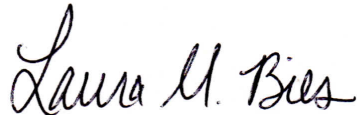
The Ornithological Council submitted comments to this docket in July 2022. We offer one additional comment, responding to the additional information released by the USFWS in October 2022.

For Form 3-200-7 (Migratory Bird and Eagle Scientific Collecting), the revised notice from October 2022 proposes adding a question regarding whether institutional animal care and use committee (IACUC) approval is required. If the answer is yes, the application would prompt applicants to pro-

vide their approval or a copy of their application. However, it could be the case that a researcher is applying for a scientific collecting permit before they apply for or secure approval from their institution's IACUC. Given the recent delays in permit processing, we have been encouraging researchers to apply early for their permits, so that their field work is not delayed. This is even more likely to be the case for work with endangered species, since these permits take longer to process and researchers often apply for their USFWS permits several months before they plan to begin their field work. The Ornithological Council recommends adding an additional possible answer to the proposed question, which would allow the applicant to indicate that they have not yet applied for or secured IACUC approval but plan to do so before beginning their field work.

Again, we value our partnership with the U.S. Fish and Wildlife Service, and with the Migratory Bird Program in particular. We appreciate this opportunity to share some information with the agency about how the requirements of the MBTA permit system impact ornithologists. Thank you in advance for considering our views.

Sincerely,

A handwritten signature in black ink that reads "Laura M. Bies". The signature is written in a cursive, flowing style.

Laura M. Bies
Executive Director