

# Central Flyway Council

Alberta Kansas Nebraska North Dakota Oklahoma South Dakota Wyoming  
Colorado Montana New Mexico Northwest Territories Saskatchewan Texas



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**RECEIVED**

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**Div. of Policy, Perf. &  
MGMT. Programs**

Service Information Collection Clearance Officer

U.S. Fish and Wildlife Service  
MS:BPHC, 5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Proposed Information Collection; Migratory Bird Surveys (Federal Register Vol 82, No. 36,  
February 24, 2017, Page 11603)

The Central Flyway Council (Council) supports the United States Fish and Wildlife Service's (Service) request to the Office of Management and Budget (OMB) for approval of information collection (IC) for migratory bird surveys (50 CFR 20.20; OMB Control Number: 1018-0023). The Council fully supports continuation of these surveys (i.e., Migratory Bird Harvest Information Program (HIP) and the Migratory Bird Hunter, Parts Collection, and the Sandhill Crane surveys) in their current protocol and methodology. Below we provide more specific comments addressing the bulleted points of discussion.

- *Whether or not the collection of information is necessary, including whether or not the information will have practical utility.*

The migratory game bird harvest and hunter estimates obtained from this IC are critical to the proper scientific-based management of migratory game bird populations under the Migratory Bird Treaty Act. The four flyway councils (Atlantic, Mississippi, Central, and Pacific), in cooperation with the Service, make informed decisions in setting and adjusting hunting regulations that establish appropriate levels of harvests, thus maximizing migratory game bird hunter participation while sustaining populations at desired levels. Without this IC, less than optimal migratory game hunting regulations may be selected annually, resulting in a decrease in hunting recreation and local economic expenditures. Within the Central Flyway, 140,000 goose hunters, 200,000 duck hunters, and 370,000 dove hunters spend approximately 3 million days afield thanks, in part, to the information provided through this IC and other migratory bird monitoring programs implemented by the Service and States. Thus, Council indisputably believes these surveys are necessary and provide a practical utility.

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The Central Flyway Council is a coalition of 10 states, two Canadian provinces and one Canadian territory that works in conjunction with the federal government to manage migratory birds and their habitats throughout a large sector of North America. Conservation programs for migratory birds, particularly waterfowl, in mid-America are delivered by Central Flyway Council states in cooperation with federal agencies and nongovernmental partners. Recreational use of migratory birds, including waterfowl, is enjoyed by more than 27 million people and generates more than \$19.5 billion annually of total economic output in the United States.

- *The accuracy of our estimate of the burden for this collection of information.*

Council does not believe these surveys cause a significant burden on respondents, which remains completely voluntary, and find that accuracy of these estimates is appropriate based on our experience with migratory game bird hunters across our 10 states (Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, and Wyoming).

- *Ways to enhance the quality, utility, and clarity of the information to be collected.*

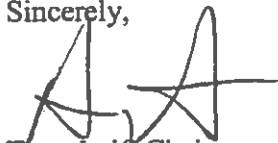
Council believes these surveys are currently conducted in an appropriate fashion and methodology that provides accurate and precise estimates of migratory game bird hunter and harvest. Until alternative methodologies are available, developed, and properly vetted, these current mailing methods are the sole method for obtaining high quality information with migratory game bird surveys. This IC also allows each individual State to evaluate human dimensions decisions (e.g., timing of seasons, zone boundaries) regarding our respective hunting season selections within the Service's established federal frameworks for migratory game bird hunting seasons.

- *Ways to minimize the burden of the collection of information on respondents.*

As previously mentioned, we believe these surveys do not cause a significant burden on respondents, and currently these IC methodologies provide the only means to collect this information in a systematic, statistically-based approach. However, we encourage examination of methods that would reduce the burden on respondents, and are willing to work with the Service on any improvements or changes to these surveys in the future. We note that such changes would require appropriate funding for their development and implementation, and would need to ensure their comparability with results from previous methods.

We appreciate the opportunity to comment, and continue our support for the OMB's approval of the Service's Migratory Bird Surveys (OMB Control Number: 1018-0023).

Sincerely,



Tony Leif, Chair

cc:

Richard Jacobson, Chair, Atlantic Flyway Council  
Russ Mason, Chair, Mississippi Flyway Council  
Eric Gardner, Chair, Pacific Flyway Council  
Jerome Ford, U.S. Fish and Wildlife Service  
Brad Bortner, U.S. Fish and Wildlife Service  
Kathy Fleming, U.S. Fish and Wildlife Service