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1018-0023

Baker, Nanette R (DFW) <Nanette.Baker@dfw.wa.gov>
To: "madonna_baucum@fws.gov" <madonna_baucum@fws.gov>

Mon, Apr 24, 2017 at 6:48 PM

Good afternoon. Please see the attached letter from Eric Gardner, Chair of the Pacific Flyway Council, regarding the approval of migratory bird surveys by the Office of Management and Budget.

Sincerely,

Nanette Baker

Administrative Assistant

Wildlife Program

Washington Department of Fish & Wildlife

(360) 902-2361

 **PFC Federal Register_HIP_Crane.pdf**
84K

PACIFIC FLYWAY COUNCIL

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April 24, 2017

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

RE: 1018-0023

To Whom It May Concern:

The Pacific Flyway Council (Council) would like to provide comments regarding the approval of migratory bird surveys by the Office of Management and Budget. 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. 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 data obtained from these surveys are absolutely critical to the proper management of migratory game bird populations and maintaining hunting seasons. We, in cooperation with the U.S. Fish and Wildlife Service (Service), endeavor to make informed decisions in setting and adjusting hunting regulations that allow appropriate harvests that are within the guidelines that will allow for those populations' well-being and provide a maximum of hunting recreation. Without the reliable data on various harvest parameters derived from these surveys, our ability to make appropriate decisions could result in less than optimal migratory game bird populations and a decrease in hunting recreation. We also believe these surveys provide substantial evidence regarding wise management of migratory game bird populations that prevents meaningful legal challenges against migratory game bird hunting seasons. Thus, Council indisputably believes these surveys are necessary and provide a practical utility.

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

The exact methodology used to estimate of collection burden of this information was not clear to Council, but the estimates do not appear to be unreasonable. Council does not believe these surveys cause a significant burden on respondents. Finally, we believe the necessity to collect this information far outweighs the time and effort to collect this information.

- *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 reliable data. However, we believe there can be improvements in approaches and techniques to conduct these surveys to increase efficiency, reliable or use new and changing technologies. Currently, Council is involved with the Service and other partners at a national level to examine ways to improve HIP data collection. The use of electronic surveys in the Migratory Bird Hunter and Sandhill Crane surveys may allow for an increase

in sample size, thereby increasing reliability and accuracy, assist in reducing the overall cost of those surveys, and decreasing the burden to respondents. We encourage examination of those techniques and are willing to work with the Service in any improvements or changes to these surveys. However, we note that such exploration of electronic surveys would require appropriate funding for their development and implementation.

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

As we mentioned in the second point, we do not believe these surveys cause a significant burden on respondents. However, in the previous point, we also mentioned the use of electronic surveys as one possible measure to reduce the burden on respondents. We reiterate that we encourage examination of methods that would reduce the burden on respondents, and are willing to work with the Service in any improvements or changes to these surveys. We again note that such changes would require appropriate funding for their development and implementation. We appreciate the opportunity to comment, and continuation support for these important survey efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Gardner", followed by a horizontal line.

Eric Gardner, Chair
Pacific Flyway Council

cc: Richard Jacobson, Chair, Atlantic Flyway Council
Russ Mason, Chair, Mississippi Flyway Council
Tony Leif, Chair, Central Flyway Council
Jerome Ford, U.S. Fish and Wildlife Service
Brad Borner, U.S. Fish and Wildlife Service
Kathy Fleming, U.S. Fish and Wildlife Service