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Ornithological
Council



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ABOUT BIRDS

Association of Field Ornithologists

Birds Caribbean

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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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30 October 2023

U.S. Geological Survey
Information Collections Clearance Officer
12201 Sunrise Valley Drive, MS 159
Reston, VA 20192

Submitted via email to: gs-info_collections@usgs.gov

Re: OMB Control Number 1028–0082 (U.S. Geological Survey Bird Banding Permit Applications and Band Recovery Reports)

The Ornithological Council appreciates the opportunity to offer comments on the bird banding permit application and renewal forms used by the U.S. Geological Survey's Bird Banding Laboratory (BBL).

The Ornithological Council is a consortium of scientific societies of ornithologists. The research conducted by their members spans the globe and their cumulative expertise comprises the knowledge that is fundamental and essential to science-based bird conservation and management. The members of these scientific societies may be researchers working for academic institutions, museums, agencies or non-profit organizations. Their work runs the gamut from field research, to teaching, to curating museum collections. Collectively, the ornithological research they conduct and facilitate enables ornithological conservation around the globe.

Federal permit applications, policies, and regulations are a priority of the Ornithological Council, as such permits are often a prerequisite for the scientific research undertaken by ornithologists. Therefore, we appreciate the USGS's attention to improving efficiency and reducing regulatory burden through this Information Collection.

We have organized our comments according to the questions posed by the U.S. Geological Survey in their Federal Register Notice.

(1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility.

As noted above, banding permits are essential for much of the work that ornithologists do. We support the BBL and the banding program, and we value the work that it does. We agree that the information collected by banding permit applications and renewal forms are necessary for the Lab's functions and we provide minor suggestions below to improve those forms, reduce the burden on applicants and banders, and improve clarity of the application requirements.

(2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used.

The agency estimates the time to complete a banding application at 30 minutes. That estimate is low if it is meant to include time to prepare the required additional documents that must be provided along with the application form (as discussed below). We suggest that 60-90 minutes is a more realistic estimate.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected.

The application asks applicants to attach a one-page description of what they hope to achieve with their banding project. The checklist (a separate form also required for the application to be complete) requires applicants to attach a resumé/CV and a 'comprehensive research project description.' Any revisions should make clear whether the same document can be used for both purposes.

As the Bird Banding Lab's website notes, the list of capture methods in Box 12 of the application is not complete, but the BBL requires listing all desired capture techniques on permit applications (banders are to attach a short narrative indicating all capture techniques that they intend to use for their banding activities). We encourage you to either list all possible capture methods in Box 12, or list none and request that applicants list their desired methods in that space. Providing check boxes for some, but not all, methods is confusing for applicants. Clarification about whether a simple list of proposed methods suffices, or whether the applicant's prior experience with each method should be indicated there (as opposed to in the resumé or CV), would be helpful, as well.

Currently, the banding application asks applicants if they would like to be authorized to sample blood or feathers. The BBL website indicates that "permits can authorize the collection of blood samples, feather samples, and mouth swabs from birds that are also banded and/or marked." We encourage you to add authorization for mouth swabs to the application, so it is clear that swabs are authorized.

In addition, over the years, there has been some confusion over whether banding permits can authorize cloacal samples or whether a separate scientific collecting permit is needed from the

U.S. Fish and Wildlife Service. We encourage the BBL to also add a question regarding cloacal swabs to the application form. We note that mouth swabs and tracheal swabs are mentioned in the application checklist, but not on the application itself.

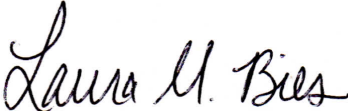
(4) How the agency might minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

We encourage USGS to develop a system to allow online submission of the banding application form and all supplementary materials. Such a system should also allow online tracking of application status and easy renewal of permits.

Finally, the affirmation at the bottom of the application form requires applicants to comply with the Bird Banding Manual. We encourage you to provide a link to the most recent edition of the Manual on the form, or to the equivalent information on the Lab's website, if the Manual is no longer current.

Thank you for considering the views of ornithologists.

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