



Shaping the future for birds

November 19, 2013

Mr. Hope Gray
Service Information Collection Clearance Officer
U.S. Fish and Wildlife Service
MS 2042-PDM
4401 North Fairfax Drive
Arlington, VA 22203

Thank you for the opportunity to comment on whether or not the information collected from federal fish and wildlife permit applicants is warranted considering the costs involved in terms of both time and money (Federal Register, vol. 78, Number 219, November 13, 2013, pages 68086-68088).

The American Bird Conservancy (ABC) is puzzled by this request, as it appears to be a fishing expedition, perhaps intended to reduce the requirements necessary for obtaining federal fish and wildlife permits by applicants, ranging from non-profit scientific (e.g. accredited museums and zoological parks) to commercial purposes (e.g. utilities). We do not take issue with estimates of the time and costs involved, as they seem accurate. However, the request, as stated, contains little or no specific information on any proposed changes to the current permit application system. It is therefore impossible to offer more than general comments regarding this request.

In general, there are always ways that “the quality, utility and clarity” of the information to be collected can be enhanced” and ways that a system can be streamlined to “minimize the burden of the collection of information on respondents.” We emphasize, however, that the minimum amount of information to be collected must allow the USFWS to make a valid determination that the proposed action is permissible under the law. Information regarding impact on wild populations, proposed use of the specimens and explanations of necessary mitigation/compensation, when required, are thus critical for allowing the USFWS to do its important job of protecting our public trust resources for the benefit of all.

We will be following this process with great interest.

Sincerely,

Michael Hutchins, Ph.D.
National Coordinator, Bird Smart Wind Energy Campaign



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Cc: D. Schroeder, S. Holmer