

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSIONS**

North American Wetland Conservation Act Program

A. Justification - Information collection requirements for grant programs:

1. The North American Waterfowl Management Plan (NAWMP), first signed in 1986, is a tripartite agreement among Canada, Mexico and the United States to enhance, restore and otherwise protect continental wetlands to benefit waterfowl and other wetland associated wildlife through partnerships between and among the private and public sectors. Because the 1986 NAWMP did not carry with it a mechanism to provide for broadly-based and sustained financial support for wetland conservation activities, Congress passed and the President signed into law the North American Wetlands Conservation Act (Act) of 1989 to fill that funding need (attached). The purpose of the Act, as amended, is to promote long-term conservation of North American wetland ecosystems and the waterfowl and other migratory birds, fish and wildlife that depend upon such habitat through partnerships. Principal conservation actions supported by NAWCA are acquisition, enhancement and restoration of wetlands and wetlands-associated habitat.

As well as providing for a continuing and stable funding base, the Act establishes an administrative body, made up of a State representative from each of the 4 Flyways, 3 representatives from wetlands conservation organizations, the Secretary of the Board of the National Fish and Wildlife Foundation and the Director of the U.S. Fish and Wildlife Service. This North American Wetlands Conservation Council is exempt from the requirements of Public Law 92-463 (Federal Advisory Committee Act). The purpose of the Council is to recommend wetlands conservation project proposals to the Migratory Bird Conservation Commission (MBCC) for funding (See the Act, Sect. 5. Approval of Wetlands Conservation Projects, and Subsection (a) Consideration By the Council.)

Subsection (c) of Section 5 (Council Procedures) provides that the "...Council shall establish practices and procedures for the carrying out of its functions under subsections (a) and (b) of this section..." which are consideration of projects and recommendations to the MBCC, respectively. The means by which the Council decides which project proposals are important to recommend to the MBCC is through grants programs that are coordinated through the Council Coordinator's office (Division of Bird Habitat Conservation, formerly known as the North American Waterfowl and Wetlands Office) within the Fish and Wildlife Service.

Section 19 of the Act (Assessment of Progress in Wetlands Conservation) requires that the Secretary of the Interior, in cooperation with the North American Wetlands Conservation Council, 1) develop and implement a strategy to assist in the implementation of the Act in conserving the full complement of North American wetlands systems and species dependent on the habitats and 2) develop and implement procedures to monitor and evaluate the effectiveness of wetlands conservation projects completed under the Act. Section 19 is the basis for the

strategy developed by the Council and information collections requested herein (Evaluation Grant Program) to monitor and evaluate the ongoing grants programs of the Council

2. Competing for grant funds involves applications from partnerships that describe in substantial detail project locations and other characteristics, to meet the standards established by the Council and the requirements of the Act. The Council Coordinator's office no longer routinely publishes and distributes instructional booklets that assist the applicants in formulating project proposals for Council consideration. Materials that describe programs and assist applicants in formulating project proposals for Council consideration are now available on a website, i.e., [birdhabitat.fws.gov](http://birdhabitat.fws.gov). However, those who are not able to access a computer may still obtain instructional materials by regular mail. There has been, virtually, no change in the scope and nature of these instructions since the OMB approval was granted in 1999. Guidelines/instructions, which will be contained in Federal Register requests for proposals, for the Evaluation Grant Program initiative is an information collection instrument. Other documents, which have not changed, were included with the original submission in 1999. The instructional booklets and other instruments, e.g., Federal Register notices on request for proposals, are the bases for this information collection request for OMB clearance. Information collected under this program is used to respond to such needs as: GPRA reporting, SF 424s, grant agreements, budget reports and justification, public and private requests for information, data provided to other programs for databases on similar programs, Congressional inquiries and reports required by the Act, etc. In the case of the Evaluation Grants Program guidelines, they respond to the statutory requirements of the Act.

3. Although electronic applications are permitted, less than about 2 percent are submitted in that manner. The Service is actively exploring ways to further facilitate the electronic grant application process. Both floppy disks and E-mail files are utilized to send grant instructions to the applicants; phone inquiries/contacts are common. Often, subsequent information exchange between the applicant and staff involves electronic mail and facsimile. The office employs innovative technological developments as appropriate and feasible to lessen paperwork burdens on applicants and grantees.

4. Not applicable. The overall program covers Canada, Mexico and the U.S., although the Grant Evaluation Program is to be initiated only in the U.S., and the information sought for evaluation to determine relative project importance is unique to each location, situation and to each application. Current programs do not and cannot provide the data and information necessary to meet the monitoring and evaluation requirements of Section 19 of the Act.

5. Not applicable. Small entities, e.g., small land trusts, would be affected in the same way and to the same degree as larger entities. Most of the applicants and grantees qualify as small entities. The Service, in concert with the Council, attempts to ensure that only a minimum of information is necessary for participation in the NAWCA grants programs. The program paperwork requirements are in line with the nature of the program.

6. The North American Wetland Conservation Council has established the minimum process to ensure their responsibilities under the Act. Elimination of the information collection

process would eliminate the program as it would be otherwise impossible to determine eligibility and the scale of resource values or relative worth of the proposed projects. Reducing the frequency of collection would only reduce the frequency of windows for grant opportunities as the information is unique to each project.

7. Not applicable. None of these "standards" are violated by administration of this program.

8. The 60-day Federal Register notice was published on Tuesday, April 23, 2002 (67 FR 19771). No comments were received as a result of this 60-day notice.

9. Other than recommendations by the Council and decisions by the MBCC to award grant monies to the successful applicants, no payments or gifts are made.

10. Not applicable. There is no confidentiality needed or involved in the information provided by the applicants as a result of the information collection.

11. Not applicable. There are no questions of a personal, or other sensitive, nature required to be answered by the applicants.

12. The summary information on hours provided in the following table was arrived at by first estimating the number of applications (40) that will be submitted for funding by the end of this grants year. It is impractical to extrapolate from the other regular programs of previous years because they are of different character; the Evaluation Grants Program in support of Section 19 of the Act has no other counterpart. The estimated total, annual hourly burden for grant application construction (640 hours) is the sum of the products of estimated numbers of pre-proposals (30) and proposals (10) and an estimate of the average time taken to construct an application, i.e., 8 hours and 40 hours for pre-proposals and proposals, respectively. The grand total cost per year (\$16,000) is the sum of the totals of the products of the annual hourly burden and the estimated cost/hour (\$25). The total estimated cost/year is \$6,000 and \$10,000 for pre-proposals and proposals, respectively.

<b>Estimated Number of Applicants</b>	<b>Estimated Applications Annually</b>	<b>Estimated Average Time Prep.</b>	<b>Estimated Annual Burden Hrs.</b>	<b>Estimated Burden Cost/Hr.</b>	<b>Estimated Total Cost/Yr.</b>
30	30	8 hrs	240 hrs	\$25.00/hr	\$6.0 thous.
10	10	8 hrs	400 hrs	\$25.00/hr	\$10.0 thous.
40	40	Not Add.	640 hrs	\$25.00/hr	\$16.0 thous.

13. There are no requirements for costs other than labor-related costs identified in item 12. above.

14. The Division of Bird Habitat Conservation was given authorization to manage all information collection and processing carried out under the authority of the Act. Consequently, the entire annual administrative budget should be interpreted as the cost to the Federal Government. The administrative budget for the past five years has averaged \$2.35 million.

15. Not applicable. No changes in Items 13 and 14 were reported.

16. Not applicable. No publication is planned to result from this information collection effort.

17. Not applicable. The Service is not seeking a waiver from the requirement to display the expiration date of the OMB approval of the information collection.

18. Not applicable. There are no exceptions to the certification statement in item 19 of OMB 83-I.

**B. Collection of Information Employing Statistical Methods:**

There is no statistical sampling or information program involved in this process.