

**1SUPPORTING STATEMENT A FOR
PAPERWORK REDUCTION ACT SUBMISSION**

**In-Season Subsistence Salmon Fishery Catch and Effort Survey
OMB Control Number 1018-NEW**

Terms of Clearance: None

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The administration and uses of national wildlife refuges and wetland management districts are governed by the National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-668ee) (Administration Act), as amended by the National Wildlife Refuge System Improvement Act of 1997; the Refuge Recreation Act of 1962 (16 U.S.C. 460k-460k-4) (Recreation Act); and, the Alaska National Interest Lands Conservation Act (16 U.S.C. 3101 *et seq.*) (ANILCA). ANILCA provides specific authorization and guidance for the administration and management of national wildlife refuges within the State of Alaska.

The Yukon Delta National Wildlife Refuge (YDNWR) is requesting authorization to implement subsistence fisher surveys for the purposes of informing in-season fisheries management decision-making in the Kuskokwim River subsistence salmon fishery. A program is already in place and is operated by Tribal partners (the Orutsararmiut Traditional Native Council and the Kuskokwim River Inter-Tribal Fisheries Commission [KRITFC]), but the YDNWR would like to be more involved in planning and administering the surveys.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The information collected by the survey includes the times individuals left and returned from boat launches, several characteristics of their fishing gear, broad classification of where the fishing activity occurred, for how long they actively fished, and how many of each of three salmon species they harvested. When coupled with aerial boat counts performed by the YDNWR, these data can be used to obtain quantitative estimates of total fishing activity and salmon harvest occurring from short-duration subsistence harvest opportunities. The estimates are then used to inform the management strategy used jointly by the YDNWR and the KRITFC.

Questions asked by the interviewer on the “Bethel Boat Harbor Interview Form” include:

We ask for...	So that we can...
Fishing date, location, start/end time, and soak time	To estimate the amount of time people fished to be included in a harvest model and in which area's they fished
Net type, mesh size, and net length	Calculate catch rate and estimated harvest
Type and amount of catch (Chinook, Chum, Sockeye, Sheefish, other Whitefish)	To estimate harvest of each species of salmon or other fish.
Interviewee comments	Any comments they would like to tell managers.

3. Describe whether, and to what extent, the collection of information involves the use

of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

The collection does not require any electronic collection techniques at this point. Due to the remote locations of the survey and absence of reliable network connectivity, we will manually conduct all surveys.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

One Tribal organization uses this survey during the summer subsistence openings for gillnetting of salmon. Cooperatively, State, Federal and Tribal agencies use this information to calculate harvest estimates of all salmon species during the fishing opportunity.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This survey does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

There is no consequences to the Federal program since Orutsararmiut Native Council is the primary interviewer. Securing OMB approval would allow the Service to participate in this collection.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require we conduct the collection in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On October 12, 2018, we published in the *Federal Register* ([83 FR 51695](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on December 11, 2018. We received one comment in response to that notice but it did not address the information collection requirements. We made no changes to the collection in response to that comment.

In addition to the Federal Register Notice, we consulted with the nine (9) individuals identified in Table 8.1 who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below in Table 8.1. We received responses from 4 of the 9 individuals we contacted.

Table 8.1

Organization	Title
Auburn University	Biometrician
Kuskokwim River Intertribal fish commission	Biometrician
Alaska Dept. of Fish and Game	Fisheries Biologist
Alaska Dept. of Fish and Game	Advisory Council Coordinator
Kuskokwim River Salmon Management Working Group	Working Group Member
Kuskokwim River Intertribal fish commission	Outreach Coordinator
Orutsararmiut Native Council	Partners Biologist
Association of Village Council Presidents	Natural resource biologist
Kuskokwim River Intertribal Fish commission	Director

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments: In-season catch and effort data from the Kuskokwim Rivers subsistence

fishery is a priority information need during years of low salmon abundance, which has occurred recently for Chinook Salmon. When coupled with other assessment data, catch and effort harvest data allow managers to effectively balance harvest and escapement needs. In past years, these data have been able to answer the core question of how many fish are being harvested in-season when decisions must be made.

FWS Response/Action Taken: No Action Taken

Comments: These questions provided information critical to compiling in-season harvest data from limited, short-term subsistence fishing openings that targeted Chinook salmon on the lower Kuskokwim River. Due to a depressed Chinook salmon population, commercial fisheries have been closed and managers targeting an escapement objective need to monitor in-season subsistence harvests, but there was historically no in-season monitoring of subsistence harvests. These questions help provide information to increase management precision, particularly when other data sources are lacking.

FWS Response/Action Taken: No Action Taken

Comments: Under the currently implemented management strategy, this information is very useful. The current strategy used to manage Chinook salmon subsistence harvests involves the expression of an explicit target harvest, which is harvested in short duration block openers. This information allows the estimation of harvest from previous openers, which can then inform managers about how much more opportunity can be provided without exceeding the harvest target. All the questions on the survey are necessary to estimate effort and harvest.

FWS Response/Action Taken: No Action Taken

Comments: In-season harvest data assists managers in making in-season management decisions by providing estimates of fishing effort and power. Local knowledge on fishing practices and effort is an important tool that can help make improved management decisions by directly involving the fishers.

FWS Response/Action Taken: No Action Taken

Comments: The collection of information is necessary during years of low Chinook salmon returns and when conducting in-season harvest estimates. The data collected with this survey will provide real-time harvest data to managers. This information from the Bethel Boat Harbor would be otherwise unavailable. Considering Bethel is the largest village on the Kuskokwim River, it is crucial Bethel has adequate representation in the harvest monitoring program.

FWS Response/Action Taken: No Action Taken

“The accuracy of our estimate of the burden for this collection of information”

Comments: Each row corresponds to one unique fishing trip and could take between 1-5 minutes per interviewee.

FWS Response/Action Taken: We feel the surveys will average 3-5 minutes per interview. Until we have had a chance to formally implement the survey, we will stick with our initial estimate of 5 minutes per survey.

Comments: To go over the data from the Bethel Boat Harbor Interview Form, I would estimate that it would take no longer than 5 minutes for most people to complete the information. This could take longer if there are language barriers, or if the interviewer is not clear when asking the questions.

FWS Response/Action Taken: Language barriers could make the interview longer, If required during the interview we have staff who are fluent in both English and Yupik. However, we feel this would be an infrequent occurrence and will keep our time estimate at 5 minutes per response for now.

Comments: I estimate that each interview should take between 2-3 minutes (assuming questions only, no other conversation). Each form contains enough space for 15 interviews (each is a different fisher) - meaning each form should take 30-45 minutes if the interviewer was constantly interviewing. However, I believe the arrival of fishers to the Bethel Boat Harbor has been intermittent in previous years, where perhaps 15 minutes to an hour may pass between interviews.

FWS Response/Action Taken: We feel the surveys will average 3-5 minutes per interview. Until we have had a chance to formally implement the survey, we will stick with our initial estimate of 5 minutes per survey.

Comments: My estimate of time required to complete each form to verify the accuracy of estimates is 10 min per form.

FWS Response/Action Taken: We feel the surveys will average 3-5 minutes per interview. Until we have had a chance to formally implement the survey, we will stick with our initial estimate of 5 minutes per survey.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: It is recognized that the harvest reporting area should be precise enough to allow harvest by different river strata to be estimated, but coarse enough to protect confidentiality. Some stakeholders are concerned about the magnitude of harvesting in non-spawning tributaries or outside of the mouth of the Kuskokwim River main stem. Subsistence harvest data based on the ADF&G post-season household survey are used to compile Kuskokwim River harvest summaries. However, these household survey data are compiled by village/community and in some cases misrepresent harvests from outside the Kuskokwim River mouth as coming from within the Kuskokwim. Historically, interviews using the survey form as presented generally ignored harvests (i.e., no interview) reported from outside of the Kuskokwim River mouth. Including interviews of harvests from outside of the river mouth will provide a metric for comparing to the household's survey data

FWS Response/Action Taken: We believe that interviews at the Bethel boat harbor will give a large representation of harvest within the Bethel area

Comments: I do not have any suggestions. This is straightforward interview form that collects catch and effort data.

FWS Response/Action Taken: No Action Taken

Comments: If we had more surveyors, we could have improved coverage at harbors near the Bethel boat harbor, thus increasing our sample size.

FWS Response/Action Taken: If approved, there will be more surveyors conducting the survey giving managers a larger sample of fishers.

Comments: No, from my understanding this survey has been implemented successfully in previous years - all needed information was gained by conducting the interviews as listed on the form, so I don't see that any changes need to be made.

FWS Response/Action Taken: No Action Taken

Comments:

- Providing pictures of the different fish may be helpful as some people may not know the common names.
- It may also be helpful to have the Yup'ik names available as a reference. This could be located next to the fish picture on a separate page.
- You may want to include a column for Other Fish Species (to include pike, lush, trout, pinks, etc.)
- A map of the Kuskokwim River may be helpful for people to show where they fished; not all interviewers may be away of the landmarks described by fishermen.
- Having Yup'ik/English bi-lingual interviewers would be a huge asset.

FWS Response/Action Taken: Pictures will be provided of all fish species in Kuskokwim River with their common name and Yupik Name. Translators can be available since the refuge does have many staff members who are fluent in English and Yupik. Maps of the different sections of the river will be shown so fishers will know what section they fished in.

“Ways to minimize the burden of the collection of information on respondents”

Comments: Make sure people are aware that it is voluntary and confidential.

FWS Response/Action Taken: We will notify all interviewees that participation is voluntary and confidential.

Comments: Excluding any personal opinions on the individual's confidential harvest is critical. It is also important we inform the interviewees their information is confidential and will only be used for the purpose of in-season fisheries management.

FWS Response/Action Taken: We will notify all interviewees that participation is voluntary and confidential.

Comments: I believe this survey has been designed to be as minimally intrusive as possible already, while still obtaining the necessary information. So I suggest no further changes that may minimize the burden on the survey respondent.

FWS Response/Action Taken: No Action Taken

Comments: In an ideal situation, respondents would report data using an electronic application. However, the ability to use digital data sources is extremely limited within the study area.

FWS Response/Action Taken: No Action Taken

Comments: Nobody likes surveys, myself included. The questions asked for this survey are pretty minimal, and designed to be minimally invasive. The interview itself should only take 1-2 minutes, or could go longer depending on what comments the interviewee wants to expand on

FWS Response/Action Taken: No Action Taken

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There is no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Collection does not collect personally identifiable information (PII). The interviewer also verbally states to interviewee that this collection is voluntary and no PII is collected.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

The most interviews that were conducted in past years by tribal organizations was **1,014 interviews** totaling **85 annual burden hours (rounded)**. We anticipate that to be our estimate burden hours in the future. We estimate the annual dollar value of the burden hours is **\$3,077**

(rounded). We based our estimated responses on the number of surveys administered by the Tribal Council in 2017.

We used the of Bureau of Labor Statistics (BLS) News Release [USDL-18-1941](#), December 14, 2018, Employer Costs for Employee Compensation—September 2018, to calculate the cost of the total annual burden hours. Table 1 lists the hourly rate for all workers (individuals) as \$36.22, including benefits.

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours
<i>Bethel Boat Harbor Interview Form</i>							
Individuals	1,014	1	1,014	5 min	84	\$ 36.63	\$ 3,076.92

*Rounded to match ROCIS

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no nonhour burden cost associated with this collection of information.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to the Federal government is **\$16,003.40**. We calculated the cost using the hourly estimates shown below in Table 14.1.

We used Office of Personnel Management Salary Table [2019-AK](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with BLS News Release [USDL-18-1941](#), December 14, 2018, Employer Costs for Employee Compensation—September 2018.

Table 14.1

Action	Position and Grade	Hourly Rate	Fully Burdened Hourly Rate (Incl. Benefits)	Total Annual Hours	Total Annual Cost
Contacting Respondents	Biological Technician GS-05/05	\$ 20.12	\$ 31.99	60	\$ 1,919.40
	Fishery Biologist GS-09/05	30.49	48.48	60	2,908.80
Analysis	Fishery Biologist GS-12/05	44.22	70.31	40	2,812.40
	Fishery Biologist GS-09/05	30.49	48.48	40	1,939.20
Report Review	Supervisory Biologist GS-13/05	52.58	83.60	20	1,672.00
	Fishery Biologist GS-12/05	44.22	70.31	40	2,812.40
	Fishery Biologist GS-09/05	30.49	48.48	40	1,939.20
TOTALS:				300	\$ 16,003.40

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB Control Number and expiration date on the form and other appropriate materials.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.