

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

**Federal Subsistence Regulations and Associated Forms, 50 CFR 100 and 36 CFR 242  
OMB Control Number 1018-0075**

**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 Alaska National Interest Lands Conservation Act (ANILCA) mandates that rural residents of Alaska receive priority for subsistence uses of fish and wildlife. In 1989, the Alaska Supreme Court ruled that ANILCA's rural priority violated the Alaska Constitution. As a result, the Federal Government manages subsistence uses on Federal public lands and waters in Alaska--about 230 million acres or 60 percent of the land within the State.

Title VIII of ANILCA (16 U.S.C. 3111-3126) designates the Departments of the Interior and Agriculture as the key agencies responsible for implementing the subsistence priority on Federal public lands. To help carry out subsistence management responsibilities, the Secretaries of the Interior and Agriculture established the Federal Subsistence Management Program. Regulations implementing the Federal Subsistence Management Program on Federal public lands within Alaska are in the Code of Federal Regulations (50 CFR 100 and 36 CFR 242).

The Federal Subsistence Management Program is a multi-agency effort to provide the opportunity for a subsistence way of life by rural Alaskans on Federal public lands and waters while maintaining healthy populations of fish and wildlife. Subsistence fishing and hunting provide a large share of the food consumed in rural Alaska. The State's rural residents harvest about 22,000 tons of wild foods each year--an average of 375 pounds per person. Fish make up about 60 percent of this harvest Statewide.

This dependence on wild resources is both cultural and economic. Alaska's indigenous inhabitants have relied upon the traditional harvest of wild foods for thousands of years and have passed this way of life--its culture and values--down through generations. Subsistence has also become important to many non-Native Alaskans, particularly in rural Alaska. The program provides for public participation through the Federal Subsistence Board and 10 regional advisory councils (50 CFR 100.11 and 36 CFR 242.11). The Board is the decision-making body that oversees the program. It is comprised of the regional directors of the U.S. Fish and Wildlife Service, National Park Service, Bureau of Land Management, Bureau of Indian Affairs, and U.S. Forest Service. The Secretaries of the Interior and Agriculture appoint a public representative who serves as chair of the Board and two public members who possess personal knowledge of and direct experience with subsistence uses in rural Alaska. The regional advisory councils: (1) provide recommendations and information to the Board; (2) review proposed regulations, policies and management plans; and (3) serve as a public forum for subsistence issues.

ANILCA and regulations at 50 CFR 100 and 36 CFR 242 require that persons engaged in taking fish, shellfish, and wildlife on public lands in Alaska for subsistence uses apply for and obtain a permit to do so and comply with reporting provisions of that permit.

**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.**

### **Appointment of Members to Regional Advisory Councils**

The following forms are associated with recruitment and selection of members for regional advisory councils:

- **FWS Form 3-2321** (Federal Subsistence Regional Advisory Council Membership Application/Nomination).
- **FWS Form 3-2322** (Regional Advisory Council Candidate Interview).
- **FWS Form 3-2323** (Regional Advisory Council Reference/Key Contact Interview).
- **FWS Form 3-2300** (Federal Subsistence Regional Advisory Council Membership Incumbent Application) **NEW**

Based upon recommendations of the Federal Subsistence Board, the Secretary of the Interior with the concurrence of the Secretary of Agriculture appoints members to the 10 regional advisory councils. ANILCA requires members to be residents of the region in which they serve. The Board established five additional criteria for membership on the Councils. Members must have:

- Knowledge of the region's fish and wildlife resources;
- Knowledge of the region's subsistence uses, customs, and traditions;
- Knowledge of the region's commercial, sport, and other uses;
- Leadership skills; and
- Communication skills.

The member selection process begins with the information that we collect on the application. Ten interagency review panels interview all applicants and nominees, their references, and regional key contacts. The information provided by the applicant on the application form is the basis for these contacts. The information that we collect through the application form and subsequent interviews is the basis of the Federal Subsistence Board's recommendations to the Secretaries of the Interior and Agriculture for appointment and reappointment of council members.

***FWS Form 3-2321 – Completed by applicants and others nominating individuals for membership.***

- Questions 1 through 4 pertain to the applicant's regional knowledge of resources and uses of those resources.
- Question 5 concerns the applicant's leadership experience.
- Question 6 pertains to communication skills.
- Question 7 helps determine the applicant's knowledge of public lands.
- Questions 8 and 9 help gauge the applicant's willingness and availability to attend meetings.
- Question 10 is necessary to determine which user group the applicant wishes to represent.
- We request that applicants provide at least three references.

**FWS Form 3-2322** – Completed by review panel members when interviewing applicants.

- Question 1 asks if the applicant is willing to serve as a volunteer with no compensation, except for travel and per diem expenses.
- Questions 2, 10, and 11 help to gauge the applicant's commitment level.
- Questions 3-9 relate to questions on the application form and provide an opportunity for discussion and gathering of more detailed information that many respondents are not able to give in writing.

**FWS Form 3-2323** – Completed by review panel members when interviewing references and key contacts.

- Questions 1-3 provide other perspectives of the applicant's experience and abilities.
- Questions 4 and 5 provide the agency with a better understanding of the applicant's ability to work with others and of his or her standing in the community and region.

**FWS Form 3-2300 (NEW)** – This is a new form developed for use by incumbent applicants for membership.

- Question 1 asks if the applicant has any changes or update to their original FWS Form 3-2321.
- Question 2 concerns the applicant's continued desire to serve on the Council and their goals.
- Question 3 is necessary to determine which user group the applicant wishes to represent.
- We request that applicants provide at least three references.

**Hunting and Fishing Applications, Permits, and Reports.** Persons engaged in taking wildlife, fish, and shellfish on public lands in Alaska for subsistence uses must apply for, obtain a permit, and comply with reporting provisions of that permit. We use five forms to collect information from qualified rural residents for subsistence harvest:

- FWS Form 3-2326 (Federal Subsistence Hunt Application, Permit, and Report).
- FWS Form 3-2327 (Designated Hunter Application, Permit, and Report).
- FWS Form 3-2328 (Federal Subsistence Fishing Application, Permit, and Report).
- FWS Form 3-2378 (Designated Fishing Application, Permit, and Report).
- FWS Form 3-2379 (Federal Subsistence Customary Trade Recordkeeping Form).

All subsistence program land managing agencies in Alaska use these forms to verify the applicant as a federally qualified user and to track take of wildlife and fish. Staff anthropologists use the information to make customary and traditional use determinations by describing the past human uses of resources, who has used them, and where they have been used. Staff biologists use the information to evaluate harvest success, effectiveness of season lengths, harvest quotas, and restrictions, hunting/fishing patterns and practices and overall use. The Federal Subsistence Board uses the harvest data, along with other information, to set future season dates and bag limits for Federal subsistence resource users. These seasons and bag limits are set to meet needs of subsistence hunters without adversely impact to the health of existing animal populations.

**FWS Form 3-2326** – Completed by Federally qualified subsistence users who want to harvest

wildlife.

- Applicants provide information on the permit to identify:
  - (1) They are a federally qualified subsistence user;
  - (2) Their community of primary residence for community harvest allocations; and
  - (3) The unit, season, hunt number and permit number.
- Question 1 identifies whether the applicant hunted or used a designated hunter.
- Questions 2a through 2e identify success rates by time, location, and take of animal.
- Question 3 identifies date of take and biological data of animal.

**FWS Form 3-2327** – Completed by Federally qualified subsistence users who want to harvest wildlife for other federally qualified subsistence users.

- Applicants provide information on the permit to identify:
  - (1) They are a federally qualified subsistence user;
  - (2) Their community of primary residence for community harvest allocations; and
  - (3) The unit, season, hunt number and permit number.
- Applicants provide a list of names of other persons they hunted for, their harvest ticket/registration permit and their community to ensure they are federally qualified subsistence users.
- Remaining information provides harvest data such a unit, drainage or specific location and number, by sex, of animals taken.

**FWS Form 3-2328** – Completed by Federally qualified subsistence users who want to harvest fish.

- Applicants provide information on the permit to identify:
  - (1) They are a federally qualified subsistence user;
  - (2) Their community of primary residence for community harvest allocations;
  - (3) Season and permit number; and
  - (4) Other household members that may fish with the permit.
- Remaining information identifies dates, locations, types of gear, fish species and number of fish harvested for biological and anthropological analysis.
- Depending on in-season management requirements, a condition may be included for certain fisheries that requires a 72-hour reporting requirement. This management tool is only used when conservation concerns exist that may require the emergency closure of the fishery to prevent over harvest.

**FWS Form 3-2378** – Completed by Federally qualified subsistence users who want to harvest fish for other federally qualified subsistence users.

- Applicants provide information on the permit to identify:
  - (1) They are a federally qualified subsistence user;
  - (2) Their community of primary residence for community harvest allocations; and
  - (3) Season and permit number.
- Applicants identify both whom they fished for and their subsistence permit number. The permit number verifies they are federally qualified users and tracks usage by communities.
- Remaining information tracks species taken, number retained and gear for biological and anthropological analysis.

**FWS Form 3-2379** – Completed by Federally qualified subsistence users who want to take part in customary trade. Staff anthropologists use the information to make customary and traditional use determinations and to write an analysis based on the provisions in Section 804 of ANILCA. These analyses further reduce the pool of eligible subsistence users and may allocate harvests by community, in part, based on documented uses of the resource.

- Applicants provide information on the permit to identify:
  - (1) That they are a federally qualified subsistence user;
  - (2) Their community of primary residence for community harvest allocations;
  - (3) Season and permit number; and
  - (4) Other household members who may conduct customary trade with the permit.
- Remaining information tracks date of sales, buyers, and buyers' addresses, total dollar amount, species taken, fish parts.

We also collect nonform information. Regulations at 50 CFR 100 and 36 CFR 242 contain procedures for the nonform information collection requirements, including required documentation.

- **Repeal of Federal subsistence rules and regulations** (applies only to the State of Alaska). If the State enacts and implements laws that are consistent with sections 803, 804, and 805 of ANILCA, the State may submit a petition to the Secretary of the Interior for repeal of Federal subsistence rules.
- **Proposed changes to Federal subsistence regulations.** Members of the public may propose changes to the subsistence regulations by providing:
  - Contact information (name, organization, address, phone number, fax number, email address).
  - Type of change (harvest season, harvest limit, method and means of harvest, customary and traditional use determination).
  - Regulation to be changed.
  - Language for proposed regulation.
  - Why change should be made.
  - Impact on populations.
  - How change will affect subsistence uses.
  - How change will affect other uses.
  - Communities that have used the resource.
  - Where resource has been harvested.
  - Months in which resource has been harvested.
- **Special action requests.** A special action is an out-of-cycle change in a season, harvest limit, or method of harvest. The Federal Subsistence Board may take a special action to restrict, close, open, or reopen the taking of fish and wildlife on Federal public lands: (1) to ensure the continued viability of a particular fish or wildlife population; (2) to ensure continued subsistence use; and (3) for reasons of public safety or administration. Members of the public may request a special action by providing:
  - Contact information (name, organization, address, telephone number, fax number, email address).
  - Description of requested action.
  - Any unusual or significant changes in resource abundance or unusual conditions

affecting harvest opportunities that could not reasonably have been anticipated and that potentially could have significant adverse effects on the health of fish and wildlife populations or subsistence users.

- The necessity of requested action if required for reasons of public safety or administration.
  - Extenuating circumstances that necessitate a regulatory change before the next regulatory review.
- **Requests for reconsideration (appeals).** Any person adversely affected by a new regulation may request that the Federal Subsistence Board reconsider its decision by filing a written request within 60 days after a regulation takes effect or is published in the Federal Register, whichever comes first. Requests for reconsideration must include:
    - Contact information (name, organization, address, telephone number, fax number, email address).
    - Regulation and the date of Federal Register publication.
    - Statement of how the person is adversely affected by the action.
    - Statement of the issues raised by the action, with specific reference to: (1) information not previously considered by the Board; (2) information used by the Board that is incorrect; and (3) how the Board's interpretation of information, applicable law, or regulation is in error or contrary to existing law.
  - **Other permits and reports.**
    - Traditional/Cultural/Educational Permits. Organizations desiring to harvest fish or wildlife for traditional, cultural, or educational reasons must provide a letter stating that the requesting program has instructors, enrolled students, minimum attendance requirements, and standards for successful completion.
    - Fishwheel, Fyke Net and Under Ice Permits. Persons who want to set up and operate fishwheels and fyke nets, or use a net under the ice must provide:
      - (1) Name and contact information and other household member who will use the equipment. Fishwheels must be marked with registration permit number; organization's name and address (if applicable), and primary contact person name and telephone number; under ice nets must be marked with the permittee's name and address.
      - (2) Species of fish take, number of fish taken, and dates of use.

**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.**

FWS Forms 3-2321, 3-2322, 3-2323 are available on our forms website (<http://www.fws.gov/forms/>). However, most applicants live in remote communities and do not have Internet access. Many who do have Internet access have outdated programs and computers. Most applicants have access to fax machines through community government or tribal offices, and have generally reliable mail service. We make the application form available to the public through extensive mailings, distribution of paper copies at regional advisory council meetings, Federal agency field staff, and special mailings upon request. Applicants may submit

completed applications electronically, in person, or by mail or fax. We receive very few submissions electronically. We receive most applications via mailed or during meetings.

FWS Forms 3-2326, 3-2327, 3-2328, 3-2378, 3-2379 are primarily issued by local land managers in extremely rural parts of the State. Most of these areas are not located on the road system and standard land line phones and the Internet are not available to members of the public. U.S. mail service is generally reliable, but can be limited during inclement weather. These forms are not available over the Internet due to the above reasons and the fact that local land managers may need to control the number of permits issued based on harvest quotas. None of these forms are completed electronically.

We accept all nonform information by mail, fax, and email.

**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.**

The Federal Subsistence Program is unique to Alaska. No other Service office or Federal agency collects this information.

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

The collection of this information 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.**

If we do not collect this information, we would not be able to manage the resources and assess the needs of subsistence users. It would be impossible to address current population trends without knowing the animals/fish that were harvested in the previous season and adjustments to provide for user needs would be impossible without understanding the patterns, practices and uses.

**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.**

Occasionally, we require hunters/fishers to report the taking of wildlife/fish within 15 days or 72 hours. This is a conservation tool used by in-season managers. By having early reporting, managers can close the season to prevent over harvest of the general population or over harvest of a certain sex of the population. For salmon harvest, depending on in-season management requirements, a condition may be included for certain fisheries that requires a 72-hour reporting requirement. This management tool is only used when conservation concerns exist that may require the emergency closure of the fishery to prevent over harvest. This is also important for managers when dealing with populations--both fish and wildlife--that migrate across vast areas of the State. There are no other special circumstances that require us to conduct this information collection in a manner that is 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 September 28, 2018, we published in the *Federal Register* ([83 FR 49121](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on November 27, 2018. We received no comments in response to that notice.

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:

**Table 8.1**

<b>Organization</b>	<b>Title</b>
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen



Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen
Regional Advisory Council Member	Private Citizen

**“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: Generally, all respondents understood the need for this collection of information, especially for in-season management issues (mainly the take of salmon). No negative responses were received.

FWS Response/Action Taken: No action required.

**“What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information”**

Comments: The average times suggested by respondents were as follows:

- 3-2321 Membership Application – 30 minutes to 2 hours.
- 3-2322 Applicant Interview – 30 minutes to 1 hour.
- 3-2323 Reference/Contact Interview – 15 minutes
- 3-2300 Incumbent Application – 30 minutes
- 3-2326 Hunt Application and Permit – 5 to 30 minutes.
- 3-2326 Hunt Report – 5 to 15 minutes.
- 3-2327 Designated Hunter Application and Permit – 5 to 30 minutes.
- 3-2327 Designated Hunter. Hunt Report – 5 to 15 minutes.
- 3-2328 Fishing Application and Permit – 5 to 30 minutes.
- 3-2328 Fishing Report – 5 to 15 minutes.
- 3-2378 Designated Fishing Application and Permit – 10 to 30 minutes.
- 3-2378 Designated Fishing Report – 10 to 30 minutes.
- 3-2379 Customary Trade Recordkeeping Application and Permit – 10 to 30 minutes.
- 3-2379 Customary Trade Recordkeeping, Report – 10 to 15 minutes.
- Petition to Repeal – No comments.
- Proposed Changes – 30 minutes to 1 hour.
- Special Action Request – 30 minutes to 2 hours.
- Request for Reconsideration (Appeal) – 1 to 2 hours.
- Traditional/Cultural/Educational Permits and Reports – 1 to 2 hours.
- Fishwheel, Fyke Net, and Under-Ice Permits and Reports – No comments.

FWS Response/Action Taken: Most of the recommended times fell within our previous approximate times to fill out each form. We will revise the following forms time requirements to reflect the recommendations:

- 3-2300 Incumbent Application – 30 minutes
- 3-2378 Designated Fishing Report – 10 minutes.
- 3-2379 Customary Trade Recordkeeping, Report – 10 minutes.
- Special Action Request – 1 hour.

Request for Reconsideration (Appeal) – 2 hours.  
Traditional/Cultural/Educational Permits and Reports – 1 hour.

**“Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected”**

Comments: Respondents had no comments or stated that no changes were needed.

FWS Response/Action Taken: No action required.

**“Any ideas you might suggest which would minimize the burden of the collection of information on respondents”**

Comments: One comment was received suggesting that permits be available via the internet.

FWS Response/Action Taken: The Federal Subsistence Board is working toward some of the reports being available via the Program web page and some of the reports currently can be called into the local land or in-season manager. However, the applications and permits cannot be completed on-line due to regulatory requirements that individuals show proof of their rural residency.

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

We do not provide gifts or payments to respondents.

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

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (Permits System - Interior, FWS-21, September 4, 2003, 68 FR 52610; modification published June 4, 2008, [73 FR 31877](#)).

**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.

We estimate a total of **15,242 responses** totaling **6,769 annual burden hours** for this collection.

The dollar value of the annual burden hours is approximately **\$195,759 (rounded)** (6,769 hours x \$28.92/hr) (rounded). The “May 2017 Occupational Employment and Wage Estimates – Alaska” lists the mean hourly wage for persons in occupational code 45-0000, “[Farming, Fishing, and Forestry Occupations](#)” as \$19.41. We multiplied the hourly wage by 1.49 to account for benefits in accordance with Bureau of Labor Statistics (BLS) News Release [USDL-19-0449](#), March 19, 2019, Employer Costs for Employee Compensation—December 2018, resulting in a total hourly cost factor of \$28.92. This rate is likely high for most subsistence users. For purposes of this collection, we used the same hourly rate for State and tribal officials.

Form/Activity	Number of Annual Respondents	Number of Annual Responses	Completion Time per Response	Total Annual Burden Hours*
3-2321 Membership Application	76	76	2 hours	152
3-2322 Applicant Interview	76	76	30 mins	38
3-2323 Reference/Contact Interview (Individuals)	165	165	15 mins	41
3-2323 Reference/Contact Interview (Government)	24	24	15 mins	6
3-2300 Incumbent Application <i>NEW</i>	6	6	30 mins	3
3-2326 Hunt Application, Permit. And Report	11,141	11,141	15 mins	2,785
3-2327 Designated Hunter Application and Permit	701	701	15 mins	175
3-2328 Fishing Application and Permit	2,136	2,136	15 mins	534
3-2378 Designated Fishing Application and Permit	58	58	15 mins	15
3-2379 Customary Trade Recordkeeping Appl. and Permit	18	18	15 mins	5
Petition to Repeal	1	1	2 hours	2
Proposed Changes	70	70	30 mins	35
Special Actions Request	17	17	30 mins	9
Request for Reconsideration (Appeal)	741	741	4 hours	2,964
Traditional/Cultural/Educational Permits and Reports	5	5	30 mins	3
Fishwheel, Fyke Net, and Under-Ice Permits and Reports	7	7	15 mins	2
<b>TOTALS:</b>	<b>15,242</b>	<b>15,242</b>		<b>6,769</b>

\* Rounded

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers 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 non-hour cost burden associated with this information collection.

**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.**

We estimate that the total annual cost to the Federal Government to administer this information collection is **\$524,243 (rounded)** (\$390,743 for salaries and \$133,500 for other costs).

To calculate salary costs, we estimated the average time for each task involved in the process and multiplied by the estimated average hourly wage of the staff involved in the process. We used the Office of Personnel Management Salary Table [2019-AK](#) to determine the hourly rate and multiplied the rate by 1.59 to account for benefits, in accordance with BLS News Release [USDL-19-0449](#), March 19, 2019, Employer Costs for Employee Compensation—December 2018.

Grade/Step	Hourly Rate	Hourly Rate w/Benefits
GS 5/5	\$20.12	\$31.99
GS 11/5	36.89	58.66
GS 12/5	44.22	70.31
GS 13-5	52.58	83.60
GS-15/5	73.08	116.20

### **Salary Costs - \$390,743**

- \$158,138 - Tasks associated with hunting and fishing applications, permits, and reports
  - Administrative support for printing contract and mailing for applications and permits - GS-11/5 - 15 hours X \$52.82 = \$792 (rounded).
  - Two staff members review of applications and issuance of permits - GS-11/5 – 2,968 hours X \$52.82 = \$156,770 (rounded).
  - Data entry of harvest information - GS-5/5 - 20 hours X \$28.82 = \$576 (rounded).
- \$114,503 - Tasks associated with FWS Forms 3-2321, 3-2322, and 3-2323.
  - Nominations review panels involving 32 agency staff conduct applicant and reference interviews and evaluate applicants - GS-12/5 - 660 hours X \$63.32 = \$41,791 (rounded).
  - Six staff members coordinate work of 10 regional panels - GS-12/5 - 290 hours X \$63.32 = \$18,363 (rounded).
  - Coordinator of recruitment and selection process - GS-12/5 - 160 hours X \$63.32 = \$10,131 (rounded).
  - Interagency Staff Committee (10 members) evaluate information collected by regional panels - GS-13/5 - 490 hours X \$75.29 = \$36,892 (rounded).
  - Federal Subsistence Board (5 members) evaluates the information makes recommendations to the Secretaries of the Interior and Agriculture - GS-15/5 - 70 hours X \$104.66 = \$7,326 (rounded).
- \$118,102 - Tasks associated with nonform information collections
  - Six staff members evaluate, validate, and process nonform information collections - GS-12/5 – 1,400 hours X \$63.32 = \$88,648 plus GS-13/5 - 280 hours X \$75.29 = \$21,081 (rounded) = \$109,729.
  - Federal Subsistence Board evaluates and decides the final outcome for nonform requests - GS-15/5 - 80 hours X \$104.66 = \$8,373 (rounded).

### **Other Costs - \$133,500**

- Newspaper, Radio, and TV Ads - \$95,000.
- Printing, Distribution, and Postage Fees - \$28,500.
- Travel (associated with recruitment and selection process) - \$10,000.

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

We discovered an error with previous IC entries for forms 3-2326, 3-2327, 3-2328, 3-2378, and 3-2379. Rather than entering each form once with a combined application and reporting time of 15 minutes, the previous Clearance Officer entered each form twice – once for the application time (10 minutes) and once for the reporting time (5 minutes). This resulted in a double reporting of unique applicants that is not accurate. We removed the duplicate ICs and increased the burden time in the original IC to 15 minutes total to account for the total application and reporting time.

We also added a new form (3-2300) for use by incumbents to the Regional Advisory Council. This form asks less information than the regular application form (3-2321) to reduce the burden on any individuals seeking to continue to serve on the Council.

The total burden reported resulting from these changes is a decrease of 14,048 responses and an increase of 3 burden hours.

### **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.**

We do not publish the results of this information collection.

**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 all forms 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 certifications required by 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).