

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

WATERCRAFT INSPECTION AND DECONTAMINATION REGIONAL DATA-SHARING FOR TRAIERED BOATS OMB Control Number 1090-New

Terms of Clearance: None.

Justification

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

In 2017, the Department of the Interior (DOI) convened its constituent Bureaus to address the threat of Dreissenid mussels (quagga and zebra mussels) in the western United States with special emphasis on preventing the introduction of these invasive species to the Columbia River Basin. As part of this effort, the participating Bureaus committed to advancing the actions summarized in the following plan:

Safeguarding the West from Invasive Species: Actions to Strengthen Federal, State and Tribal Coordination to Address Invasive Mussels¹.

One of the actions in the plan was to explore options for sharing information on trailered boats that are putting in and taking out of National Park Service (NPS) managed waters. In 2020, NPS obtained Office of Management and Budget (OMB) approval (OMB Control Number 1024-0285) to collect information on the origin, destination, inspection, and decontamination of trailered recreational watercraft. The NPS approval acknowledged a similar need in the following DOI bureaus: the Bureau of Land Management (BLM), Bureau of Reclamation (Reclamation), and US Fish and Wildlife Service (FWS). In an effort to reduce redundancy and duplication of effort, DOI is now seeking OMB approval for a new information collection to be used by DOI agencies responsible for management and control of aquatic and invasive species. Upon approval of this submission, the NPS will discontinue 1024-0285 to avoid a duplication of burden.

Quagga and zebra mussels are aquatic invasive species (AIS) that were introduced to the United States in ballast water discharged into the Great Lakes by transoceanic ships. In 2007, quagga mussels were found in Lake Mead National Recreational Area, likely after being introduced on the hull of a trailered recreational boat from Lake Michigan. Since then, the western states have passed legislation, promulgated regulations and, with support from the Federal government, implemented boat inspection programs and public outreach campaigns to prevent the spread of quagga and zebra mussels through the movement of trailered watercraft.

Through the Nonindigenous Aquatic Nuisance Protection and Control Act (NANPCA), as amended by the National Invasive Species Act (NISA) of 1996, Congress established the Aquatic Nuisance Species (ANS) Task Force to develop and implement a program for waters of the United States to prevent introduction and dispersal of ANS. Co-chaired by the FWS and National Oceanic and Atmospheric Administration (NOAA), the ANS Task Force is composed of

¹ https://www.doi.gov/sites/doi.gov/files/uploads/safeguarding_the_west_from_invasive_species.pdf

13 Federal and 13 ex-officio members and is the only federally mandated intergovernmental organization solely dedicated to preventing and controlling ANS. Because most invasions are caused by human activities, future invasions can only truly be prevented through changes in human behavior. In the context of zebra and quagga mussels, addressing the risk associated with recreational watercraft that are transported overland on trailers is critical to preventing introduction and spread to new waters. State and Federal watercraft inspection and decontamination (WID) programs are the primary tool for reducing this risk. In addition to identifying high-risk boats and performing decontaminations, these programs function to educate the boating public about the role they play in protecting the resources they value from Dreissenid mussels and other invasive species.

For any wildlife species listed as injurious under the Lacey Act, Title 18 U.S.C. 42, the importation into the United States, any territory of the United States, the District of Columbia, the Commonwealth of Puerto Rico, or any possession of the United States, or any shipment between the continental United States, the District of Columbia, Hawaii, the Commonwealth of Puerto Rico, or any possession of the United States is prohibited without a permit. Species may be deemed by Congress or the Secretary of the Interior to be injurious to the health and welfare of human beings, to the interest of forestry, agriculture, and horticulture, or to the welfare of the wildlife or wildlife resources of the United States. The zebra and the quagga mussels are federally listed as injurious species under 18 U.S.C. 42. Importation into the United States, including by land and water from Canada and Mexico, is prohibited under 18 U.S.C. 42; however, transportation between States within the continental United States is not prohibited under the same. Many western States have laws prohibiting the possession or transportation of zebra or quagga mussels, and a violation of these laws may trigger a violation of the "wildlife trafficking" provisions of the Lacey Act (16 U.S.C. 3372 (a)(2)) that state that it is unlawful for any person to:

“ . . . import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce . . . any fish or wildlife taken, possessed, transported, or sold in violation of any law or regulation of any State or in violation of any foreign law . . . ”.

A recreational boater, for example, might trigger 16 U.S.C. violation by towing a boat that is contaminated with zebra or quagga mussels across State lines if it is a violation of the laws of one or both States.

Watercraft inspection and decontamination (WID) are key components of AIS prevention programs. WID programs have been implemented throughout the West with the aim of reducing the introduction and spread of quagga and zebra mussels on trailered recreational watercraft. WID involves inspections at checkpoints strategically located at particular water bodies or, in the case of some states, along highways. WID stations are located on or near boat ramps or strategic points of entry associated with DOI managed waters. At DOI managed sites, contacts with boaters (and, if needed, inspections) occur soon after watercraft are pulled out of the water or immediately prior to launching. These efforts are coordinated with State or Tribal partners as appropriate.

As Federal members of the ANS Task Force, NPS, BLM, Reclamation and FWS are mandated by NANPCA (as amended by NISA) to establish and implement measures to minimize the risk of introduction, establishment, or spread of ANS to waters of the United States. Further, Executive Order 13751, Safeguarding the Nation from the Impacts of Invasive Species, states that Federal agencies shall consider opportunities to apply innovative science and technology to

invasive species prevention and management, including promoting open data and data analytics. Consistent with these statutes and the Executive Order, in cooperation with states, the ANS Task Force's Western Regional Panel, and other Federal agencies, the NPS, BLM, Reclamation, and FWS are engaged in the effort to prevent the spread of quagga and zebra mussels. This Information Collection Request (ICR) is to collect data at watercraft inspection/decontamination stations at sites across the western United States.

Prior to launching, soon after pulling out of the water, or before leaving a marina, boaters will be asked to complete a short survey that will be used to share time-sensitive information among the agencies working to prevent the spread of quagga and zebra mussels. The survey will provide management agencies with information about the origin and treatment of trailered recreational watercraft needed to assess risk and prioritize inspection/decontamination.

Legislative Authorities:

- **Promotion and Regulation (54 U.S.C. 100101)**
The Secretary, acting through the Director of the National Park Service, shall promote and regulate the use of the National Park System by means and measures that conform to the fundamental purpose of the System units, which purpose is to conserve the scenery, natural and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations
- **Nonindigenous Aquatic Nuisance Prevention and Control Act/National Invasive Species Act (16 U.S.C. 4701)**
"Whenever the [Aquatic Nuisance Species Task Force] determines that there is a substantial risk of unintentional introduction of an aquatic nuisance species by an identified pathway and that the adverse consequences of such an introduction are likely to be substantial, the Task Force shall, acting through the appropriate Federal agency, and after an opportunity for public comment, carry out cooperative, environmentally sound efforts with regional, State and local entities to minimize the risk of such an introduction." The work of the Task Force is carried out through six regional panels, issue species subcommittees, 13 ex-officio members, and 13 Federal members, which includes the NPS, BLM, Reclamation, and FWS.
- **Injurious wildlife provisions of the Lacey Act (18 U.S.C. 42(a))**
Prohibits importation into the United States or any shipment between the continental United States, the District of Columbia, Hawaii, the Commonwealth of Puerto Rico, or any possession of the United States of wild vertebrates and certain invertebrates listed by Congress or declared by the Secretary of the Interior to be injurious to humans or agriculture, horticulture, forestry, wildlife, and wildlife resources, except under certain circumstances and pursuant to regulations. Zebra and quagga mussels are listed as injurious under this law.
- **Prohibited acts of the Lacey Act (16 U.S.C. 3372)**
Prohibits (in part) the import, export, transport, sale, receipt, acquisition, or purchase of any fish or wildlife or plant that was taken, possessed, transported, or sold in violation of any law or regulation of any State, Tribal, or foreign law; this includes invasive species laws. The movement of zebra and quagga mussels on trailered watercraft is regulated under the laws of many western States. Trailered boats that are moved across State boundaries and in violation of State regulations may be in violation of 16 U.S.C. § 3372.

- **National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.)**
Provides policies and planning mechanisms to protect and mitigate resources from damage. Affected agencies will abide by all applicable requirements under NEPA for actions related to quagga/zebra mussel prevention and control.
- **Fish and Wildlife Coordination Act (16 U.S.C. § 661 et seq., as amended by John D. Dingell, Jr. Conservation, Management, and Recreation Act, 25 U.S.C. 3701, et seq. Pub. L. No. 116-9, sec. 7001(b)(2))**
Makes recommendations to agencies to conserve trust resources including recommendations regarding invasive species.
- **Federal Land Policy and Management Act of 1976, as Amended, 43 U.S.C. 1701, et seq.**
Directs the Bureau of Land Management to “take any action necessary to prevent unnecessary and or undue degradation of the public lands.”
- **National Wildlife Refuge System Administration Act (16 U.S.C. §§ 668dd-ee, regulated through 50 CFR)**
Establishes the National Wildlife Refuge System and requires FWS to administer lands to provide for the conservation of fish, wildlife, plants, and their habitats and to ensure that biological integrity and diversity is maintained. National Wildlife Refuges are closed to public uses (by statute, regulation, and authority) until opened by the Service, and in opening them to those uses, must be found Appropriate (Service Policy 603 FW 1) and Compatible (Service Policy 603 FW 2) with the purposes of the refuge and the mission of the Refuge System.
- **Executive Order 13112 (February 3, 1999) as amended by Executive Order 13751 (December 5, 2016)**
EO 13751 establishes the policy of the United States to prevent the introduction, establishment, and spread of invasive species, as well as to eradicate and control populations of invasive species that are established.

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.

All responses will be entered via a designated app on a smartphone, tablet, or similar device by Bureau staff. The user interface for the app will include the following fields:

Information Collected	Purpose
<p><u>Inbound watercraft:</u> Has the boat been out of state in the last 30 days? Has the boat been in any other waters in the last 30 days?</p>	<p><u>Inbound:</u> Used to assess the risk associated with incoming boats based on origin and the time for which mussels and other AIS may remain viable</p>
<p><u>Outbound watercraft:</u> Has the boat been in any other waters in the last 30 days?</p>	<p><u>Outbound:</u> Used to determine whether the vessel represents a risk to other water bodies, including those managed by Interior bureaus, other Federal agencies, or partners</p>

Information Collected	Purpose
<i>Outbound watercraft:</i> What is the destination for the boat? Where and when will the boat be launched next?	Used to identify waters at risk contamination from outbound boats and communicate this risk to the appropriate management agencies
What compartment or containers on the boat, including ballast tanks, hold water? If the boat includes compartments that hold water, initiate inspection. (both inbound and outbound watercraft)	Internal systems that hold water are one of the key indicators of the risk that a boat may be transporting mussel larvae and juveniles or other AIS.
Possession of live aquatic bait (both inbound and outbound watercraft)	Many species that are used as live bait are non-native and/or invasive
Presence of mussels, other AIS and or AIS risk factors (observation)	Used as a process improvement - if AIS were detected on a previously inspected/ decontaminated watercraft, how can methodology improve and ensure higher diligence for risk factors
Outcome of any inspection/ decontamination procedures (observation)	Determine if AIS present/absent and actions taken

The information collected will be used by following:

- NPS, BLM, Reclamation, and FWS personnel,
- NPS concessionaire employees
- State partners
- Western Regional Panel for Aquatic Nuisance Species

The purpose of the collection is to allow the timely exchange of information on the origin, destination, and presence of quagga and zebra mussels and other AIS on trailered watercraft to prevent their spread in the western U.S.

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.

Information will be collected and retrieved 100% electronically using a mobile app designed for smartphones, tablets, or similar devices. The data will be uploaded to a shared web-based database. The decision to use this proven technology is to:

- (1) Eliminate the need for paper,
- (2) Reduce the time for data entry,
- (3) Reduce the potential for errors, and
- (4) Facilitate rapid communication with partners in other Federal and state agencies.

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.

This request is an effort to eliminate duplication of information collection requests by the participating DOI Bureaus. Preventing the spread of quagga and zebra mussels in the West requires collaboration between Federal and state agencies and others. The inclusion of bureau-wide information into a centralized database eliminates the need for redundant information collections, inspections, and decontaminations when watercraft are moved through multiple jurisdictions.

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

Private boat haulers contracted to transport boats to and from the launch sites will be required to provide the information on the behalf of the individual boat owner. The burden will not cause a significant impact on the normal course of business.

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.

NPS, BLM, Reclamation, and FWS are mandated by NANPCA (as amended by NISA) to establish and implement measures to minimize the risk of introduction, establishment, or spread of AIS to waters of the United States. Further, Executive Order 13751, Safeguarding the Nation from the Impacts of Invasive Species, states that Federal agencies shall consider opportunities to apply innovative science and technology to invasive species prevention and management, including promoting open data and data analytics. Without information about watercraft and associated inspection and decontamination efforts, it would be difficult and less efficient for participating DOI agencies to fulfill mandates in NANPCA furthermore, the lack of timely and systematic distribution of data could contribute to the risk of re-introduction of AIS on trailered boats.

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 circumstances that require us to collect the information 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 December 3, 2020, we published in the Federal Register ([85 FR 78146](#)) a notice to announce our intent to submit an information collection request to OMB for approval. In that notice, we requested public comments for 60 days, ending on February 1, 2021. We received one comment during the 60-day public comment period, however it did not address the information collection requirements. Therefore, no response is required.

In addition to this notice, we contacted seven (7) individuals outside of DOI to review the survey instruments in this collection. Based on their experience, use of similar forms and the WID database, these individuals were asked to assess the clarity and overall effectiveness of the questions proposed for this collection. We received responses from five (5) of the eight (8) individuals contacted. All five (5) indicated that the questions were clear, concise, and effective as written. One reviewer suggested adding an additional question for exiting boats:

1) length of time (in days) in water for current trip;

We incorporated this question into the survey because although this question has limited applicability (only applies to locations that allow overnight stays or where slipped and moored boating options exist), the length of time in water provides information to watercraft inspection/decontamination crews to assess risk and determine whether decontamination is necessary.

List of Non Federal Reviewers contacted outside of the agency to provide feedback:

- 1) State of Arizona Invasive Species Coordinator
- 2) State of California Invasive Species Coordinator
- 3) State of Colorado Invasive Species Coordinator
- 4) State of Nevada Invasive Species Coordinator
- 5) State of New Mexico Invasive Species Coordinator

- 6) State of Oregon Invasive Species Coordinator
- 7) State of Utah Invasive Species Coordinator
- 8) State of Washington Invasive Species Coordinator

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

We will not be providing 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.

There are no assurances of confidentiality assigned to this collection. During the initial contact, only the watercraft registration number (or boat trailer license plate) will be entered into the app. From that point, all responses about the watercraft will be associated with the registration number. In the event that a watercraft does not have a visible registration number, the trailer license number will be used in its place. Although the watercraft's registration number or trailer license number could be used to identify boat owners through state boat or motor vehicle registration databases, there will be no attempt to use the information for this purpose.

After consulting with the DOI Privacy Officer, it was determined that a System of Records Notice (SORN) will not be required because the DOI Bureaus are not responsible for storing or safeguarding the information (see Privacy Threshold Analysis attached in ROCIS as supplemental documents). All data will be managed by a third-party contractor for Colorado Parks and Wildlife supported by Federal funding.

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.

There are no 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 that we will receive **335,602 annual responses** totaling **22,372 annual burden hours** for this collection. The dollar value of the burden hours is approximately **\$860,999** (rounded).

The estimated burden for each respondent group listed in the table below. We anticipate that approximately four minutes will be spent responding to the questions based upon the AIS risk factors (low or high). Our estimates are based on experiences previous collection of this nature and respondent feedback. Typical response time required an average of two minutes to enter information into app. The number of respondents is an extrapolation based the number of watercraft at sites anticipating using the WID database.

We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release [USDL-21-0437](#), March 18, 2021, Employer Costs for Employee Compensation—December 2020, to calculate the total annual burden.

- Individuals – the hourly rate for all workers is listed as \$38.60, including benefits.
- Private Sector – the hourly rate for all workers is listed as \$36.23, including benefits.
- Government – the hourly rate for all workers is listed as \$53.47, including benefits.

Table 12.1. Annual Burden Estimates

Regulation/Activity	Total Annual Responses	Completion Time/ Response	Annual Burden Hours*	Hourly Labor Rate (Incl. Benefits)	\$ Value of Annual Burden Hours*
Quagga ENTRY Survey (Recreational Boaters)					
Individuals - <i>BLM</i>	80,000	4 mins	5,333	\$ 38.60	\$ 205,854
Individuals - <i>BOR</i>	6,800	4 mins	453	38.60	17,486
Individuals - <i>NPS</i>	108,000	4 mins	7,200	38.60	277,920
Individuals - <i>USFWS</i>	1,500	4 mins	100	38.60	3,860
Quagga ENTRY Survey (Commercial Boaters)					
Private Sector - <i>BLM</i>	0	4 mins	0	\$ 36.23	\$ 0
Private Sector - <i>BOR</i>	0	4 mins	0	36.23	0
Private Sector - <i>NPS</i>	12,000	4 mins	800	36.23	28,984
Private Sector- <i>USFWS</i>	375	4 mins	25	36.23	906
Quagga ENTRY Survey (State/Local/Tribal Government Boaters)					
Government (State/Local/Tribal) - <i>BLM</i>	0	4 mins	0	\$ 53.47	\$ 0
Government (State/Local/Tribal) - <i>BOR</i>	0	4 mins	0	53.47	0
Government (State/Local/Tribal) - <i>NPS</i>	0	4 mins	0	53.47	0
Government (State/Local/Tribal) - <i>USFWS</i>	30	4 mins	2	53.47	107
Quagga EXIT Survey (Recreational Boaters)					
Individuals - <i>BLM</i>	80,000	4 mins	5,333	\$ 38.60	\$ 205,854
Individuals - <i>BOR</i>	6,800	4 mins	453	38.60	17,486
Individuals - <i>NPS</i>	36,000	4 mins	2,400	38.60	92,640

Individuals - USFWS	75	4 mins	5	38.60	193
Quagga EXIT Survey (Commercial Boaters)					
Private Sector - BLM	0	4 mins	0	\$ 36.23	\$ 0
Private Sector - BOR	0	4 mins	0	36.23	0
Private Sector - NPS	4,000	4 mins	267	36.23	9,673
Private Sector- USFWS	20	4 mins	1	36.23	36
Quagga EXIT Survey (State/Local/Tribal Government Boaters)					
Government (State/Local/Tribal) - BLM	0	4 mins	0	\$ 53.47	\$ 0
Government (State/Local/Tribal) - BOR	0	4 mins	0	53.47	0
Government (State/Local/Tribal) - NPS	0	4 mins	0	53.47	0
Government (State/Local/Tribal) - USFWS	2	4 mins	0	53.47	0
TOTALS:	335,602		22,372		\$ 860,999

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.

The estimated annualized cost to the Federal government including operational expenses is **\$4,055,695** (\$3,899,695 (rounded) salary costs and \$156,000 for initial equipment purchases).

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2021-RUS](#) to determine the annual salary costs for staff involved in reviewing and processing the information collected as shown below. The benefits rate was calculated from News Release [USDL-21-0437](#), March 18, 2021, Employer Costs for Employee Compensation—December 2020, we multiplied the annual salary by 1.6 to account for benefits. The average time for each employee averages 3 minutes per response. This Information collection will be incorporated into the workflows of existing DOI Bureaus which will not require hiring of additional staff.

Table 14.1 – Federal Government Salary

Position	Grade	Hourly Pay rate	Hourly Rate Including Benefits (1.6 x Hourly Rate)	Time Spend on Response	Weighted Average
Seasonal Technician (NPS)	GS-5, Step 5	\$ 19.15	\$ 30.64	3 minutes	\$ 1.53
Seasonal Technician (FWS)	GS-5, Step 5	19.15	30.64	3 minutes	1.53
Technician (BLM)	GS-5 Step 5	19.15	30.64	3 minutes	1.53
Technician (BLM)	GS-7, Step 5	23.72	37.95	3 minutes	1.90
Natural Resource Specialist (Reclamation)	GS-9, Step 5	29.02	46.43	3 minutes	2.32
Natural Resource Specialist (Reclamation)	GS-11, Step 5	35.11	56.18	3 minutes	2.81
Total Weighted Average:					\$ 11.62
Total Salary Costs (335,602 X weighted average):					\$3,899,695

Operational expenses include the purchase of data entry/retrieval devices (smartphones or tablets).

- For NPS, we assume at least 10 ramp staff per participating NPS unit and an average cost of \$750 per device (10 staff x \$750= \$7,500 per NPS unit). The combined total initial cost of purchasing equipment for the 10 participating NPS units will be \$75,000 (10 NPS units x \$7,500 = **\$75,000.00**).
- For Reclamation, we assume 4 ramp staff and an average cost of \$750 per device (4 staff x \$750 = **\$3,000** for Reclamation in total).
- For FWS, we assume at least 10 ramp staff per participating FWS unit and an average cost of \$750 per device (10 staff x \$750= \$7,500 per FWS unit). The combined total initial cost of purchasing equipment for the estimated 10 participating FWS units will be \$75,000 (10 FWS units x \$7,500 = **\$75,000.00**).
- For BLM we assume 4 ramp staff and an average cost of \$750 per device (4 staff x \$750 = **\$3,000** for BLM in Total).

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.

The data collected will not be tabulated, nor will statistical analysis be performed or published by the any of the participating DOI agencies. This collection is an on-going process that is conducted daily on an annual basis.

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.

The OMB Control Number will appear in the preamble before the survey that will include the PRA statement associated with the app.

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.