

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## In-Season Subsistence Salmon Fishery Catch and Effort Survey OMB Control Number 1018-0173

**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:

- *Fishing date, location, start/end time, and soak time* – Used 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* – Used to 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; and
- *Interviewee comments* – To provide an opportunity for additional comments interviewee 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 continue 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 June 22, 2022, we published in the *Federal Register* ([87 FR 37355](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on August 22, 2022. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket [FWS-R7-NWRS-2022-0078](#)) to provide the public with an additional method to submit comments (in addition to the typical [Info\\_Coll@fws.gov](mailto:Info_Coll@fws.gov) email and U.S. mail submission methods). We received the following comment in response to that notice:

**Comment 1:** Anonymous electronic comment submitted via Regulations.gov (FWS-R7-NWRS-2022-0078-0002) on August 15, 2022:

“Please don't allow the killing and harassment of fish to happen anymore, especially in places that are supposed to be wildlife refuges.”

**Agency Response to Comment 1:** Commenter did not address the information collection requirements. No response required.

In addition to the *Federal Register* Notice, we consulted with the nine (9) individuals identified below who familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

<b>Organization</b>	<b>Title</b>
ONC	Natural Resource Bio
ONC	Fish Biologist
ONC	Private citizen
Public	Private citizen
Public	Private citizen
Public	Private citizen

Public  
Public  
Public

Private citizen  
Private citizen  
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: Straight forward, Gets to the questions that needs to be asked for harvest estimates. There are no unnecessary questions and it only took 30 seconds or so to finish the survey

Agency Response/Action Taken: No Response required

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

Comments: No comments.

Agency Response/Action Taken: No response required.

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

Comments: Was quick and effortless, was not a burden on time, for what it is used for there is no ways to enhance it unless we are looking for other metrics

Agency Response/Action Taken: No response required.

And

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

Comments: This is fast and easy and that’s what it needs to be since we do hundreds of these a day and do not want to burden the public with surveys that are not helpful.

Agency Response/Action Taken: No response required.

**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 **\$3,558 (rounded)**. We based our estimated responses on the number of surveys administered by the Tribal Council in 2017.

We used Table 1 from the of Bureau of Labor Statistics (BLS) News Release [USDL-22-2307](#), December 15, 2022, Employer Costs for Employee Compensation—September 2022, to calculate the cost of the total annual burden hours. Table 1 lists the hourly rate for all workers (individuals) as \$40.90, 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
Bethel Boat Harbor Interview Form Individuals	1,014	1	1,014	5 minutes	85	\$ 41.86	\$ 3,558.10

*\*Rounded to match ROCIS*

**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 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 **\$18,351** (rounded). We calculated the cost using the hourly estimates shown below in Table 14.1.

We used Office of Personnel Management Salary Table [2023-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-22-2307](#), December 15, 2022, Employer Costs for Employee Compensation—September 2022.

Table 14.1 – Processing Bethel Boat Harbor Interview Form

Contacting respondents	Biological technician	\$ 23.08	\$ 36.70	60	\$ 2,202.00
	GS-05/05				
Analysis	Fishery biologist	34.96	55.59	60	3,335.40
	GS-09/05				
	Fishery biologist	34.96	55.59	40	2,223.60
Report Review	GS-09/05				
	Fishery biologist	50.70	80.61	40	3,224.40
	GS-12/05				
	Fishery biologist	34.96	55.59	40	2,223.60
Report Review	GS-09/05				
	Fishery biologist	50.70	80.61	40	3,224.40
	GS-12/05				
	Supervisory biologist	60.29	95.86	20	<u>1,917.20</u>
	GS-13/05				
				<b>Total:</b>	<b><u>\$ 18,350.60</u></b>

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

We are not reporting any program changes or adjustments with this submission.

**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.**

Project schedule is during the summer salmon season from May through September. Fishing openings will be announced by Federal Fisheries manager and survey will be started 3 hours after fishing time starts to 4 hours after it closes. One to two days after fishing period a public report on harvest estimates is produced. At the end of the season a final report will be sent to the subsistence regional advisory councils and to the Federal subsistence board.

**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.