

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

**HORSESHOE CRAB AND COOPERATIVE FISH TAGGING PROGRAMS
OMB Control Number 1018-0127**

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 Fish and Wildlife Act of 1956 (16 U.S.C. 742f) requires the Department of the Interior to take steps “required for the development, advancement, management, conservation, and protection of fishery resources.” In addition, the Endangered Species Act of 1973 (16 U.S.C. 1531–1544), the Wildlife Coordination Act (16 U.S.C. 661–666c), and the Anadromous Fish Conservation Act (16 U.S.C. 757a–757g) each authorize the Department of the Interior to enter into cooperative agreements with stakeholders to protect and conserve fishery resources.

Horseshoe crabs play a vital role commercially, biomedically, and ecologically along the Atlantic coast. Horseshoe crabs are commercially harvested and used as bait in eel and conch fisheries. Biomedical companies along the coast also collect and bleed horseshoe crabs at their facilities. *Limulus Amoebocyte Lysate* is derived from crab blood and is used by pharmaceutical companies to test sterility of products. Finally, migratory shorebirds also depend on the eggs of horseshoe crabs to refuel on their migrations from South America to the Arctic. One bird in particular, the red knot, feeds primarily on horseshoe crab eggs during its stopover. That bird is listed as threatened under the Endangered Species Act (effective January 12, 2015).

Horseshoe crab management has come under intense scrutiny, as crab populations appear to be on the decline, particularly in Delaware Bay. Horseshoe crabs are managed by State agencies along the Atlantic coast under the coordination of the Atlantic States Marine Fisheries Commission. The Commission was formed in 1942 by the 15 Atlantic coast States (Maine through Florida, including Pennsylvania) to assist in managing and conserving their shared coastal fishery resources. The Commission’s responsibility is to develop management plans “to promote the better utilization of the fisheries, marine, shell, and anadromous, of the Atlantic seaboard by the development of a joint program for the promotion and protections of such fisheries.”

In 1998, the Commission released the first fishery management plan for horseshoe crabs (Fishery Management Report No. 32). This tagging study has been used to address some of the research and data needs in the fishery management plan, including determining beach fidelity, spawning frequency, timing of migrations, and population boundaries along the Atlantic Coast to determine management units.

The Commission asked the U.S. Fish and Wildlife Service (we, Service) to coordinate a coast-wide tagging program for horseshoe crabs to ensure that the program is standardized across States and research programs and to relieve individual States of the burden of coordinating a program that crosses State boundaries.

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 Maryland Fish & Wildlife Conservation Office (MDFWCO) will collect information on fishes captured by the public. Tag information provided by the public will be used to estimate recreational and commercial harvest rates, estimate natural mortality rates, and evaluate migratory patterns, length and age frequencies, and effectiveness of current regulations.

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In 1998, the Atlantic States Marine Fisheries Commission (ASMFC), a management organization with representatives from each State on the Atlantic Coast, developed a horseshoe crab management plan. The ASMFC plan and its subsequent addenda established mandatory State-by-State harvest quotas and created the 1,500-square-mile Carl N. Shuster, Jr., Horseshoe Crab Sanctuary off the mouth of Delaware Bay.

Restrictive measures have been taken in recent years, but populations are increasing slowly. Because horseshoe crabs do not breed until they are 9 years or older, it may take some time before the population measurably increases. Federal and State agencies, universities, and biomedical companies participate in a Horseshoe Crab Cooperative Tagging Program. The Service's MDFWCO maintains the information collected under this program and uses it to evaluate migratory patterns, survival, and abundance of horseshoe crabs.

FWS Form 3-2310, "Horseshoe Crab Recapture Report" – Agencies that tag and release the crabs complete FWS Form 3-2310 to report tagged crabs and provide the following information:

- *Circular white tag*: (this is the primary tag placed on each crab)
 - tag number (to determine information on an individual crab)
 - whether or not tag was removed or found detached

We collect the above information so that we know whether the animal is still at large or if the tag has been removed so that the crab will no longer be recognizable by that number.

- *Crab condition*: Whether crab was alive or dead when found or if a tag was found without a crab. We use this information to determine mortality and tag retention.
- *Date captured or found*: Timing of recapture is important in determining timing of migrations and spawning frequency for individuals.
- *Crab fate*: Whether crab was kept or released. This information will help us determine commercial harvest impacts on crab populations.
- *Reporter type*: Beachcomber, commercial fishermen, biomedical company or some sort of researcher. It is important to know what groups are encountering tagged crabs.

- *Capture method*: Hand collection or collection in some kind of fishing gear. To better protect the crab population, we need to know to which types of fishing gear crabs are most susceptible.
- *Capture location*: Body of water, beach or location and nearest city. We need this information so that we can determine migratory patterns and coastal population structure of crabs.
- *Reporter information*: Name, mailing address, and email address. We use this information to send the reward package to the person providing information about a tagged horseshoe crab.
- *Comments*: Miscellaneous information provided by reporter.

FWS Form 3-2311, “Horseshoe Crab Tagging Report” – Agencies that tag and release horseshoe crabs (States, universities, businesses, and nonprofit organizations) complete FWS Form 3-2311 and provide the following data:

- *Organization Name*: Identifies which organization released the crabs so that we can provide them with related recapture information at a later date.
- *Contact person name*: Allows us to contact the individual responsible for providing the data to clarify information if necessary.
- *Tag #*: Unique number assigned to each crab, preprinted on tag.
- *Sex*: Necessary to determine differences between sexes in mortality, migration, etc.
- *PW(mm)*: We use the prosomal width (width of the crab at the widest point) to determine differences in sizes of crabs along their range.
- *Capture site, Latitude (optional), Longitude (optional), Waterbody, and State*: We use information on the capture site, latitude, longitude, waterbody, and State to determine migratory patterns.
- *Date*: We use the tagging date to determine timing of migration, longevity, and spawning frequency.

Fish Tagging Program – Fish are tagged with an external tag containing a toll-free number that is housed at MDFWCO. Members of the public reporting a tag will be asked a series of questions pertaining to the fish that they are referencing. This data will be used by fisheries managers throughout the east coast and mid-Atlantic region, depending on species.

Currently the species that are tagged are American Shad (*Alosa sapidissima*), Northern Snakehead (*Channa argus*), Striped Bass (*Morone saxatilis*), and Atlantic (*Acipenser oxyrinchus*) and Shortnose Sturgeon (*Acipenser brevirostrum*).

- **FWS Form 3-2493, “American Shad Recapture Report”** – American Shad are tagged by the NY Department of Environmental Conservation (NYDEC) and they retain all fish tagging information. The public reports tags to MDFWCO, who provides information on tag returns to NYDEC. Tag return data are used to monitor migration and abundance of shad along the Atlantic Coast.
- **FWS Form 3-2494, “Snakehead Recapture Report”** – Northern Snakehead is an invasive species found in many watersheds throughout the mid-Atlantic region. It has been firmly established in the Potomac River since at least 2004. Federal and state biologists within the Potomac River watershed have been tasked with managing the impacts of Northern Snakehead. Tagging of Northern Snakehead is used to learn more about the species so that control efforts can be better informed. Tagging is also used to estimate population sizes to monitor fluctuations in population size. Recreational and commercial fishers reporting tags provide information on catch rates and migration

patterns as well.

- **FWS Form 3–2495, “Striped Bass Recapture Report”** – Striped Bass are cooperatively managed by federal and state agencies through the Atlantic States Marine Fisheries Commission (ASMFC). The ASMFC uses fish tag return data to conduct stock assessments for Striped Bass. The database and collection is housed within MDFWCO, while the tagging is conducted by state agencies participating in Striped Bass management. Without this data collection Striped Bass management would likely suffer from a lack of quality data.
- **FWS Form 3–2496, “Sturgeon Recapture Report”** – Sturgeon are tagged by Federal, State, and university biologists, and NGO’s along the U.S. east coast and into Canada, and throughout the U.S. and Canada. Local populations of Atlantic sturgeon have been listed as either threatened or endangered since 2012 and Shortnose populations since 1973. The information collected provides data on tag retention and sturgeon movement along the east coast. The data is also used to address some of the management and research needs identified by the ASMFC Amendment 1 to the Atlantic Sturgeon Fishery Management Plan.

Data collected across these tagging programs is similar in nature, including:

- *Tag number*: Tag number is needed to identify the individual organism that was caught so that we can provide return information appropriately and associate the recapture with the release data
- *Date of capture*: Date of capture is needed to know how long the tagged animal was at large. This helps inform age, maturity, and growth information.
- *Waterbody of capture*: Waterbody of capture is needed to understand how the tagged animal moved from its original location
- *Capture method*: Capture method is used to identify which sectors of the public are providing tag return information. Relatedly, this gets used in determining harvest rates for different public sectors.
- *Fish length and weight*: Length and weight information provides us with size specific harvest information, along with growth of the tagged animal.
- *Fish fate (whether released or killed)*: Knowing fish fate also aides in determining stock status and informs potential mortality rates of released fish.
- *Fisher type (i.e., commercial, recreational, etc.)*: Fisher type also helps aide in determining harvest rates from different public sectors.

In addition, if the tag reporter desires more information on their tagged fish or wants the modest reward that comes with reporting a tag, we ask their address so that we can mail them the information.

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.

Tags distributed before 2014 were printed with a toll-free phone number and a mailing address. Tags distributed starting in 2014 are printed with only a web address. The public may report found tags by completing the online “[Horseshoe Crab Resighting Form](#)” on the [Maryland Fish & Wildlife Conservation Office](#) (MDFWCO) website. We advertise the availability of the online

form at beaches where tagged crabs are frequently encountered and also in reward package mailings to the public.

We estimate that 50 percent of the public who find older tagged crabs will report via the toll free number. We estimate that 100 percent of the public who find newer tagged crabs will report via the web page. We expect 90 percent of the tagging agencies to submit electronic files of tagging data by email and 10 percent to send completed paper datasheets to the MRFO.

At this time, the results of the information collection are not available to the public on the internet. There are no immediate plans to make the information available to the public on the internet, however cooperating individuals and agencies receive information about the program. Summary reports can be provided to individuals with a request to the tagging program coordinator. Individuals who provide information on a horseshoe crab tag are sent a package containing information on the individual crab they found. Agencies that supply tagging data are sent recapture data annually from the tags that they had released.

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.

Atlantic coast states manage horseshoe crabs under the Atlantic States Marine Fisheries Commission Fishery Management Plan for Horseshoe Crabs. The Commission encourages all States to use Service tags in order to have a coordinated coast-wide tagging effort. At this time, we are not aware of any non-Service horseshoe crab tagging programs occurring in our core area of the Atlantic coast from Florida to Massachusetts. We encourage new tagging programs to participate in the Service-sponsored program to eliminate any duplication of effort and to increase coast-wide coordination.

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

The collection does not significantly impact 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 the tagging program were not conducted, the State fishery managers would have less basic life history information available to them to manage horseshoe crab and fish populations. Since the program is conducted on an occasional level with optional reporting, it is not possible to conduct it less frequently. Additionally, Striped Bass (included in Fish Tagging Programs) tagging data is used to manage the coastwide stock, as is required by Congress under the Atlantic Striped Bass Conservation Act (16 U.S.C. 5151-5158).

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 requiring 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 February 10, 2023, we published in the *Federal Register* ([88 FR 8906](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on April 11, 2023. 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-R5-FAC-2023-0004](#)) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received the following comments in response to that notice:

Comment 1: Electronic submission via Regulations.gov (FWS-R5-FAC-2023-0004-0002) received from Jean Publiee on February 10, 2023:

“this agency is to protect and conwerve the fish. this agency is a patsy for profiteers and lets profiteers run all over it like all of gthe regulatory captgured agencies in the us govt.

they all are regulatorily captured by profiteers. nobody has them workign honestly anymore. these agencies only listen to profiteers. they disrespect the entire american public. stop letting bif pharma take any horse shoe crabs. stop letting commercial fish profiteers take any horseshoe crabs. bothprofiteers are stealing way above what they are permitted so they both need to be shut down tight. stop allowing humans to catch and kill horsehoe crabs. the birds need those crabs. you are wiping out the crabs and the birds the red knots this aency is failing miserably in its job. the big pharm can make that substance in a lab it costs tyhem money but tyhey have beenb riding the free taking for far too long cut off big pharma afger all big pharma made 35 trillion int he last pandemic and will give none of it back to american taxpayers. big pharma can pay for everythign in teh world they are so rich. cut off the horseshoe crabs from big pharma and do it now. cut off the commercial fishermen now too. save th ehorsesoe crabsfrom human exploitation. you are wiping out birds and crabs at present with your pesent methods.the venality and greed of that is outrageous”

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

Comment 2: Electronic submission via Regulations.gov (FWS-R5-FAC-2023-0004-0003) received anonymously on April 11, 2023:

“Please protect the Horseshoe Crabs. It is not necessary to hurt or kill these animals, so please stopallowing them to be hurt by people. Please protect these animals and the fishes too. People can make money without hurting or killing animals.”

Agency Response to Comment 2: The commenter did not address the information collection requirements. No response required.

Comment 3: Electronic submission via Regulations.gov (FWS-R5-FAC-2023-0004-0004) received from Amanda Day on April 11, 2023:

A letter was submitted with comment 3 addressing a few key points of the horseshoe crab tagging program and suggestions potential protocol revisions. The commenter wrote that it was the wrong time to terminate the crab tagging program, in part because it is the only mark-recapture effort that can provide information on population and survival estimates of horseshoe crabs. The commenter suggested that we employ a standardized protocol for data comparability, select a minimum number of beaches per state, conduct tag recovery surveys, develop datasheets, use online data-entry, and reconsider tagging by biomedical companies.

Agency Response to Comment 3: We appreciate the thoughtful response regarding horseshoe crab tagging. Many of the protocol suggestions are already in place. We currently provide datasheets to all interested tagging partners and require tagging agencies/groups to conduct resight surveys as part of their agreement to participate in the horseshoe crab tagging program. Additionally, we have switched to online tag reporting (fws.gov/crabtag) and about 95% of all tag returns are submitted this way. We understand the concern over biomedical companies tagging horseshoe crabs. However, the data acquired by biomedical companies tagging bled horseshoe crabs has proven to be very useful. It has helped us estimate survival rates of bled crabs vs. unbled crabs, a long-time management concern over biomedical bleeding of horseshoe crabs. As management continues to refine best management practices for biomedical bleeding, tagging data can

provide insight into the effectiveness of those practices.

Comment 4: Electronic submission via Regulations.gov (FWS-R5-FAC-2023-0004-0005) received from the Delaware Riverkeeper Network on April 12, 2023:

The Delaware River Keeper Network (DRN) wrote a comment in support of continuation of horseshoe crab tagging. They assist with a current tagging partner and believe the program is useful in a number of ways, including exposing members of the public to the unique experience of working to help manage horseshoe crabs via tagging. The DRN suggested deploying additional tags and also asked the Service to consider the recent best management practices for biomedical bleeding, provided by the Horseshoe Crab Recovery Coalition.

Agency Response to Comment 4: We appreciate the kind words about the tagging program and the volunteer efforts by all those with DRN and associated tagging partners. At this time it would be difficult to provide more tags to NJ American Littoral Society (ALS; the tagging partner working with DRN) as we have a limited budget and already provide tags. Additional tags result in higher costs mainly stemming from the associated rewards associated with recaptures of those tags by the public. We will continue to work with ASMFC and all tagging partners to best determine the proper distribution of tags along the Atlantic Coast. Consideration of the best management practices is outside of the scope of response associated with the information collection.

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.

Organization	Title
American Littoral Society	Habitat Restoration Coordinator
FL Fish and Wildlife Commission	Research Associate
General Public	Volunteer Horseshoe Crab Reporter
Save Coastal Wildlife	Tagging Coordinator
The Wetlands Institute	Conservation Biologist
VA Institute of Marine Science	Biologist
General Public	Volunteer Tagging Reporter
General Public	Volunteer Tagging Reporter
MD Department of Natural Resources	Fisheries Biologist

“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: All respondents agreed the collection of the information is necessary. The utility of the data was also mentioned in that it provides population estimates, migration rates, and spawning beach fidelity/use. There were no comments as to any questions that may be unnecessary.

Agency Response/Action Taken: No action needed as all current information that is currently collected appears to be satisfactory to all respondents.

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

Comments: All respondents generally agreed that our time burden estimates were accurate. However, one public tag reporter mentioned it only took them 2 to 3 minutes to complete the online tag reporting form instead of 10 minutes.

Agency Response/Action Taken: No action needed. However, in the future we will plan on refining our time estimates as nearly all of our tag returns now come in online as opposed to over the phone, which is the likely reason for the time discrepancy.

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

Comments: The main comments received as ways to enhance our data collection were to use an app. Respondents mentioned that using a QR code in an app would be a great way for tags to be reported with a proper latitude and longitude, which would help in determining exact locations of tag recaptures. It could also help eliminate some human error when reporting tags.

Agency Response/Action Taken: The Service has long considered using an app and is still interested in doing so. However, we are not currently set up to do so entirely. There is a third party app (Horseshoe SOS) that allows members of the public to report our tags by linking to our online reporting form.

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

Comments: One respondent suggested that digital data collection in the field may help reduce some burden associated with keying-in paper tagging forms. The respondent did mention that it may not be practical given the environmental conditions when and where they tag. There were no other suggestions for ways to minimize burden.

Agency Response/Action Taken: We would work to assist all tagging partners to develop digital data collection, however we could not provide such technology to partners due to costs. We also agree of the potential limitations of digital data collection in windy, rainy conditions while working in or near the water.

Additional comments received during the outreach:

Comments: Respondents mentioned how much they enjoyed helping the Service with their research and how the tagging program is a great source of public engagement in conservation.

Agency Response/Action Taken: No action needed, but we sincerely appreciate the kind words of the respondents as well as the help from all tagging volunteers and members of the public that actively participate in our tagging programs.

Despite multiple attempts to solicit feedback, we did not receive responses from 6 of the 9 individuals we contacted.

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

Individuals who report information about previously tagged horseshoe crabs and fish receive a

reward package for tags they report. The reward package contains a letter explaining the tagging program, a certificate that lists the individual's name, information regarding the crab reported, educational fact sheets on shorebirds and horseshoe crabs, and a pewter lapel pin in the shape of a horseshoe crab or fish. Striped Bass tag reporters can choose to receive a hat in lieu of the pin. Northern Snakehead tag reporters receive a hat, if desired. The rewards are of nominal value (\$2.50-5.00 each, depending on reward choice) used as incentive for individuals to report tags. Only first time horseshoe crab reporters receive a reward, which minimizes costs. Fish tag reporters can opt to receive a reward for each tag reported.

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 (INTERIOR/FWS-21, Permits System, published September 4, 2003, [68 FR 52610](#); modifications published June 4, 2008, [73 FR 31877](#), and March 16, 2023, [88 FR 16277](#)).

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 that we will receive **3,648 responses** totaling **2,241 annual burden hours** associated with this information collection. We estimate the dollar value of the annual burden hours to be **\$101,266** (rounded).

We used the of Bureau of Labor Statistics (BLS) [News Release](#) USDL-23-0488, March 17, 2023, Employer Costs for Employee Compensation—December 2022, to calculate the total annual burden.

- Individuals. Table 1 lists the hourly rate for all workers \$42.48, including benefits.
- Private Sector. Table 5 lists the hourly rate for all workers as \$40.23, including benefits.
- Government. Table 3 lists the hourly rate for all workers as \$57.60, 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
Horseshoe Crab Recapture Report (FWS Form 3-2310)							
Individuals	1,160	2.37068	2,750	10 minutes	458	\$ 42.48	\$ 19,455.84
Horseshoe Crab Tagging Report (FWS Form 3-2311)**							
Private Sector	12	1	12	95 hours	1,140	40.23	45,862.20
Government	6	1	6	95 hours	570	57.60	32,832.00
American Shad Recapture Report (FWS Form 3-2493)							
Individuals	5	1	5	5 minutes	0	42.48	0.00
Snakehead Recapture Report (FWS Form 3-2494)							
Individuals	30	1	30	5 minutes	3	42.48	127.44
Striped Bass Recapture Report (FWS Form 3-2495)							
Individuals	800	1.025	820	5 minutes	68	42.48	2,888.64
Government	3	5	15	5 minutes	1	57.60	57.60
Sturgeon Recapture Report (FWS Form 3-2496)							
Individuals	10	1	10	5 minutes	1	42.48	42.48
TOTALS:	2,026		3,648		2,241		\$ 101,266.20

*Rounded

**Average time required per response is dependent on the number of tags applied by an agency in 1 year. Agencies tag between 25 and 5,000 horseshoe crabs annually, taking between 2 to 5 minutes per crab. We estimate that it will take them between 1 to 450 hours to complete the form, depending on the number of crabs tagged, with an overall average of 95 hours. Each agency determines the number of tags it will apply.

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 cost burden for individuals. They can report tags via a toll-free phone number or online at the MDFWCO website. We provide tags to agencies that use less than 5,000 annually.

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 the total annual cost to the Federal Government to be **\$100,663** (rounded) as outlined below in Tables 14.1 and 14.2.

To determine hourly wage rates, we used the Office of Personnel Management Salary Table [2023-DCB](#) as an average nationwide rate. To account for benefits, we multiplied the hourly rate by 1.60 in accordance with from BLS [News Release](#) USDL-23-0488.

Table 14.1 - Salary Costs

Position/Grade	Annual Salary	Annual Salary (Inc. Benefits)*	Time Spent on Collection	Total Annual Salary Costs*
Pathways Intern, GS-03/01 (12 weeks/480 hrs)	\$ 27,822	\$ 44,793.42	23%	\$ 10,302.49
Fishery Biologist, GS-11/05	89,069	143,401.09	40%	57,360.44
Subtotal:				\$ 67,662.93

*Rounded

Table 14.2 - Non-salary Costs

Activity	Cost*
Tags	\$ 11,000
Printing reward packages	2,000
Reward Incentive (pin or hat)	14,000
Mail costs, postage	6,000
Subtotal:	\$ 33,000

*rounded

We limit the distribution of pewter horseshoe crab reward pins to one per household. If recapturers prefer, certificates can be emailed instead of postal mailing. These cost saving measures have reduced the amount of funding necessary for tags, rewards, and mailing costs.

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

We are reporting a change, due to an adjustment in agency estimate, of 20 annual responses and 2 annual 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 information regarding the horseshoe crab tagging program. Upon request, we release data to tagging agencies and fishery management agencies. The respective tagging agencies may publish portions of the tagging and recapture data to address specific research questions.

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 forms.

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.