

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

**U.S. FISH AND WILDLIFE SERVICE ARCGIS ONLINE (AGOL) PLATFORM
OMB Control Number 1018-0188**

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.

The U.S. Fish and Wildlife Service (Service) collects and maintains necessary geospatial data to meet our mission in accordance with the following authorities:

- Federal Funding Accountability and Transparency Act of 2006, as amended (31 U.S.C. 6101);
- Geospatial Data Act of 2018 (43 U.S.C. chapter 46, 2801–2811);
- National Technology Transfer and Advancement Act of 1995 (Pub.L. 104–113);
- Open, Public, Electronic, and Necessary (OPEN) Government Data Act (44 U.S.C. 3506(b)(6));
- Title II of the Foundations for Evidence-Based Policymaking Act of 2018 (Pub.L. 115–435);
- OMB Circular A-16, “Coordination of Geographic Information and Related Spatial Data Activities”;
- OMB Circular A-119, “Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities”; and
- OMB Circular A-130, “Managing Information as a Strategic Resource.”

Geospatial data identifies and depicts geographic locations, boundaries, and characteristics of features on the surface of the earth. Geospatial data includes geographic coordinates (e.g., latitude and longitude) to identify the location of earth's features, and data associated to geographic locations (e.g., land survey data and land cover type data). The Service's organizational ArcGIS online program (AGOL), accessed at <http://fws.maps.arcgis.com>, is an easy place to share data with the public and partners, as well as internally among Service staff. It can also be used to build and deploy mobile-enabled online maps, applications, and services for geographic information systems (GIS) users and non-GIS users alike. Sensitive data is restricted from public access via an internal-facing intranet version of AGOL. Moreover, because the system contains only controlled unclassified information (CUI) that would be designated as low impact under the Federal Information Security Act (FISMA; 2002), no personally identifiable information (PII) is allowed within the system.

The AGOL platform enables the Service to effectively manage geospatial data resources and technology to successfully deliver geospatial services in support of the Service's mission. Data collected through AGOL enables improved visualization, analysis, interoperability, modeling, sharing, and decision support. The benefits include increased accuracy, increased productivity, and more efficient information management and application support.

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.

In addition to collecting name and contact information (to create an account), and the additional comments about the submission and photographs (optional), we collect the following types of data from our partners through AGOL to improve our online maps, web-mapping applications, and story maps (*data collected is specific to a particular project; we will not collect all data types below with each submission*):

- Road crossing data, to include data such as location data, global positioning system (GPS) coordinates, stream name and stream flow, road name, structure type and quantity, road surface type and condition, issues present at crossing, and name and contact.
- Stream crossing data, to include data such as location/description, GPS coordinates, crossing type, structures/barriers, inlet/outlet information, and stream flow type and condition.
- Conservation project data, to include data such as project title and description, partner names and contact information, start and end dates for project, whether project is new or updated, cost of project, relevant website information, geographical location of project, project species data, project strategy (e.g., protect habitat, reduce human conflicts, climate change, etc.), and links to project reports.
- Reporting locations and/or status of Service assets (such as trails, roads, gates, etc.), invasive species, dead animals, trash on public lands, and possible hazards.
- Observations of wildlife occurrences, including location, species, observer, counts, and other physical characteristics of interest.
- Vegetation monitoring data, which would include the condition of the resource, abundance, lifeform, and more.

We use the information collected from our partners to support critical geospatial services for Service programs/functions, such as:

Endangered Species and Fisheries & Habitat Conservation

- Monitoring the extent and status of wetlands for management, research, policy development, education, and planning through the National Wetland Inventory.
- Performing Natural Resources Damage Assessments, including evaluating exposure of trust species to toxic spills.
- Proposing, designating, and informing the public about critical habitat for threatened & endangered (T&E) species and delivering official species lists and Section 7 consultations.
- Providing information about sensitive resources (T&E species, Refuges, critical habitat) within the vicinity of a proposed project.
- Conducting large-scale, multidisciplinary, multi-species analysis for habitat conservation and landscape conservation planning and restoration.
- Improving fish passage and modeling the effects of barrier removal.

Migratory Bird Conservation

- Conducting bird surveys: Survey design, navigation GPS files for pilots, and spatially referenced survey data.

- Assessing habitat conditions and monitoring habitat improvement projects in joint ventures.
- Conducting research on relationships between bird abundance/ productivity and habitat quantity and quality, and migration movement patterns.

National Wildlife Refuge System

- Developing alternatives for comprehensive conservation plans and supporting National Wildlife Refuge System (System) operational activities, including asset management, law enforcement, water resources, and fire management.
- Mapping realty transactions and land status of Service properties and proposed expansions.
- Analyzing strategic growth and land acquisition planning opportunities for the System.
- Conducting biological surveys and managing data, including inventory and monitoring, invasive species control, and habitat management plans.
- Managing Service infrastructure and assets.
- Planning, responding, and mitigating impacts from natural disasters such as wildfire, hurricanes, disease outbreaks, and more.
- Producing visitor service materials (maps, brochures) for public use and engagement of System lands.

Landscape Conservation Cooperatives

- Evaluating, planning, and implementing strategic habitat conservation and adaptive management at the landscape level.
- Performing biological planning, conservation design and delivery, monitoring, and research for climate change and other stressors at the landscape level.

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.

All submissions will be electronic via the [AGOL platform](#).

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.

There is no duplication. The information collected is specific to the geospatial data resources and technology gathered in support of the Service's mission. Due to the unique nature of this program, no other Federal agency collects this information from the public.

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

We collect only the minimum information necessary to improve the Service's visualization, analysis, interoperability, modeling, sharing, and decision support. This information collection will not significantly impact small businesses or other small entities.

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

If we did not collect the information, the Service would be unable to effectively work with our partners and public for the conservation of threatened and endangered species, management of refuge lands, and/or respond to and plan for natural disasters.

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 requiring collection of 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 March 21, 2025, we published in the *Federal Register* ([90 FR 13385](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 20, 2025. 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 No. [FWS-HQ-IRTM-2025-0010](#)) to provide the public with an additional method to submit comments (in addition to the typical U.S. mail submission method). We received the following comments in response to that notice:

Comment 1: Electronic comment ([FWS-HQ-IRTM-2025-0010-0002](#)) received via Regulations.gov on 03/28/2025 from Laura Honda. The commenter did not directly address the information collection requirements.

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

Comment 2: Anonymous electronic comment ([FWS-HQ-IRTM-2025-0010-0003](#)) received via Regulations.gov on 05/12/2025. The commenter did not directly address the information collection requirements.

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

Comment 3: Electronic comment ([FWS-HQ-IRTM-2025-0010-0004](#)) received via Regulations.gov on 05/19/2025 from Victoria Lopez. The commenter did not directly address the information collection requirements.

Agency Response to Comment 3: No response required as commenter did not address the information collection requirements.

Comment 4: Electronic comment ([FWS-HQ-IRTM-2025-0010-0005](#)) received via Regulations.gov on 05/20/2025 from Ryan Jones. The commenter did not directly address the information collection requirements.

Agency Response to Comment 4: Though the commenter didn't address the information collection requirements specifically, the comments were passed on to our Records Officer and the Acting Assistant Director for Ecological Services for awareness.

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
Mālama I nā honu	Volunteer Education Coordinator
California Department of Fish and Wildlife	Environmental Scientist
Maine Coast Heritage Trust	Marsh Restoration Program Manager
Virginia Council of Trout Unlimited	NLC Representative
Idaho Fish and Game	Fish Habitat Project Manager
State of Arkansas	Stream habitat supervisor
Virginia Commonwealth University	Associate Professor
Scripts Institute	Volunteer Coordinator
California Department of Fish & Wildlife	Senior Environmental Scientist

“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 indicated that the information collection was valuable and needed to support partner-driven conservation activities in the communities served. Nearly all information collection activities done using ArcGIS Online, including all respondents here, are citizen and partnership driven conservation science projects. All FWS staff responsible for the information collection activities engaged with their volunteers and partners to ensure the forms used to collect the conservation data are relevant, necessary, and reflective of partner needs.

Agency Response/Action Taken: No action needed.

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

Comments: Seven responses that the surveys used to collect the citizen science data could be filled out within 5-15 minutes and are reasonable for the information being collected. The two respondents said that the survey took 45 minutes and multiple hours respectively but that individuals included time to get to the survey/sampling locations. The time to fill out the forms themselves was reasonable and not a burden.

Agency Response/Action Taken: No action taken

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

Comments: For a fish passage survey, one respondent suggested that the collection form allows them to enter multiple barriers within a given location. Several respondents said the new digital collection enables multiple orders of magnitude improvement in filling out forms over paper versions. The digital collection through ArcGIS Online also avoids mailing paper forms which means better real-time data are available to all participants.

Agency Response/Action Taken: FWS staff responsible for the information collection are proactively working with their volunteers and survey respondents to improve upon the survey forms and have been receptive to feedback. All respondents have been involved early on in the process to help guide what data are collected. Several respondents specifically mentioned that their recommendations had been acted upon.

And

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

Comments: All respondents said that FWS staff were responsive to feedback and open to ways to make improvements to minimize burden. Another respondent suggested creating templates for specific use cases to allow pre-population of the form. Most respondents were active from the beginning of developing the survey form which meant their input was considered from the start. One respondent was grateful to report that FWS listened to their feedback and several survey questions were switched to optional for one form which enabled greater flexibility with the collection and reduced burden.

Agency Response/Action Taken: FWS staff responsible for the information collection are

proactively working with their volunteers and survey respondents to ensure that the burden of collection is minimized. Some of the feedback also gets relayed to the vendor that develops ArcGIS Online to make improvements.

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

We will not provide any payment 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.

We do not provide any assurance of confidentiality to respondents. Information may be disclosed to the extent permissible with applicable law. The Service will protect confidential commercial or proprietary information according to the Freedom of Information Act (5 U.S.C. 552) and DOI's implementing regulations (43 CFR 2).

ArcGIS Online does not maintain or display personally identifiable information (PII) beyond the limited data necessary for the creation and management of user accounts, to allow registered users to access the analysis tools and user created content, and to monitor online content and ensure security and compliance with legal and policy requirements for use of the tool. The Department's [AGOL Privacy Impact Assessment](#) (PIA), which covers all bureaus, indicates that AGOL does not need SORN coverage as the records are not about individuals.

For all IT access account records, Interior relies on Systems of Records Notice (SORN) INTERIOR/DOI-45, HSPD-12: Identity Management System and Personnel Security Files ([87 FR 54242](#), 09/02/2022; Exemption for the Personnel Security Program Files System – [88 FR 10479](#), 02/21/2023). We provided copies of the PIA and SORN as supplemental documents in ROCIS.

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 will not ask any 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 **1,500 responses** totaling **126 annual burden** hours for this information collection. The total dollar value of the annual burden hours is approximately **\$6,904** (rounded).

We used table 1 from the of Bureau of Labor Statistics (BLS) [News Release](#) USDL- 25-1358, September 12, 2025, Employer Costs for Employee Compensation—June 2025, to calculate the total annual burden.

- Private Sector - lists the hourly rate for all workers as \$45.65, including benefits.
- Government - lists the hourly rate for all workers as \$63.94, including benefits.

Table 12.1

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
AGOL Online Submissions							
Private Sector	150	5	750	5 min	63	\$ 45.65	\$ 2,875.95
State/Local/Tribal Govt	150	5	750	5 min	63	63.94	4,028.22
Totals:	300		1,500		126		\$ 6,904.17

*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 annual non-hour cost burden associated with this 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 annual cost to the Federal Government associated with this collection of information is **\$26,666** (rounded). This cost includes time spent by a GS-11/05 GIS analyst spending an average of 10 hours preparing and finalizing an average of 41 surveys each year ($\$65.04 \times 10 \text{ hours} \times 41 \text{ surveys}$).

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2025-RUS](#) as an average nationwide rate for a GS-11/05 GIS analyst. In accordance with BLS [News Release](#) USDL- 25-1358, we multiplied the hourly rate of \$40.15 by 1.62 to account for benefits to obtain an hourly rate of \$65.04.

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

This is a renewal without change. We are not reporting any program changes or adjustments.

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.

Information collected via the AGOL platform is partially available to the public. The vast majority of the content and information collected in the platform is internal to the Service. Of the 60,000+ content items in AGOL, only ~3500 are publicly shared. The system contains only CUI that would be designated as low impact under the Federal Information Security Act (FISMA; 2002). Sensitive and PII data is restricted from public access via an internal-facing intranet version of AGOL called ArcGIS Enterprise.

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 expiration date on the AGOL platform.

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.