

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Pribilof Islands: Administration and Taking for Subsistence Purposes
OMB Control No. 0648-0699

Abstract

This is a request for a revision and extension of collection of information control number 0648-0699. NMFS published an interim final rule (RIN 0648-BN39) and request for comments to create an exception in [50 CFR 216.82](#)¹ to authorize the use of trained and independently certified rodent detection dogs to detect and prevent the establishment of invasive rodents on the Pribilof Islands. Current regulations prohibit the landing of any dogs at the Pribilof Islands in order to prevent the molestation of the fur seal herds (50 CFR 216.82). In order for NMFS Alaska Regional Administrator to authorize an exception to 50 CFR 216.82 information must be collected from the Pribilof Island landowner to make a determination that the detection dog is independently certified and trained for rodent detection, vaccinated, and the survey, quarantine and feces management plan is consistent with the regulations.

NMFS regulations for the subsistence use of northern fur seals under the [Fur Seal Act](#)² (FSA) requires Alaska Native residents of the Pribilof Islands to report their subsistence need and their actual subsistence take of northern fur seals. The current collection of information allows the NMFS to confirm the annual subsistence use of northern fur seals is consistent with subsistence use quotas established in 2014 and 2019.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The FSA (16 U.S.C. 1161-1169b) requires the NMFS Alaska Regional Administrator, acting pursuant to delegated authority, to administer Federal lands of the Pribilof Islands and ensure that activities on such Federal lands are consistent with the purposes of conserving, managing, and protecting northern fur seals, *Callorhinus ursinus*, and other wildlife. NMFS is authorized to promulgate regulations necessary for the administration of the Pribilof Islands (16 U.S.C. 1169), which NMFS has promulgated at 50 CFR part 216, Subpart G-Pribilof Islands Administration. NMFS manages northern fur seals consistent with both the FSA and [Marine Mammal Protection Act](#)³ (16 U.S.C. 1361-1423; MMPA)

Regulations for northern fur seal subsistence harvest have been in existence since 1985. However, an information collection to support those regulations for St. Paul and St. George Island sub-adult subsistence harvest season did not exist until 2014 when NMFS requested and obtained a collection of information control number ([79 FR 65327](#)⁴; November 4, 2014). The regulations for northern fur seal subsistence harvest require the public (Pribilovians) to report to NMFS on their subsistence needs and

¹ <https://www.ecfr.gov/current/title-50/chapter-II/subchapter-C/part-216/subpart-G>

² <https://www.govinfo.gov/app/details/PLAW-106publ562>

³ <https://www.law.cornell.edu/uscode/text/16/chapter-31>

⁴ <https://www.federalregister.gov/documents/2014/11/04/2014-26177/marine-mammals-subsistence-taking-of-northern-fur-seals-st-george-island-alaska>

actual level of subsistence take of northern fur seals ([50 CFR 216.74](#)⁵).

NMFS published an interim final rule (RIN 0648-BN39) and request for comments to create an exception in [50 CFR 216.82](#)⁶ to authorize the use of trained and independently certified rodent detection dogs to detect and prevent the establishment of invasive rodents on the Pribilof Islands. Current regulations prohibit the landing of any dogs at the Pribilof Islands in order to prevent the molestation of the fur seal herds (50 CFR 216.82). NMFS has interpreted the molestation of the fur seal herds to include physical disturbance and disease transmission by a dog or its feces.

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.

The regulations at 50 CFR 216.74 state that Pribilovians are responsible for reporting their subsistence needs and actual level of subsistence take. The Pribilovians continue to conduct the annual sub-adult male subsistence harvest monitoring and reporting for St. Paul and St. George as has occurred for the past decade through the Tribal governments under co-management.

Subsistence monitoring of northern fur seal take by Pribilovians on St. George and St. Paul Island has relied on an annual self-reporting process since the previous rulemaking in 2019. The Tribal governments of both islands have fulfilled the reporting requirement for Pribilovians, with the addition of a NMFS-contracted independent monitor on St. Paul. Independent and Tribal government hunt and harvest monitoring are reconciled throughout the year to ensure accurate final reporting. Additionally, NMFS and Tribal governments on both islands discuss subsistence use by tribal members throughout the year as comanagers.

The collection of information includes dates, locations, and numbers of seals harvested and their sex, the extent of utilization of fur seals taken, and other information necessary for the Assistant Administrator to make determinations under § 216.72.

The Assistant Administrator is required to suspend or terminate the take of fur seals under § 216.72 if the overall level of subsistence is exceeded or limits of accidental female mortality are exceeded. These determinations are made based on information collected from NMFS representatives and Pribilovians monitoring and reporting the subsistence use of northern fur seals. The Tribal and NMFS representatives from each island meet as Co-Management Councils regularly to share information and discuss cooperative management of the subsistence use of marine mammals under the co-management agreement.

NMFS receives electronic copies of the northern fur seal subsistence harvest reports from the Tribal governments of St. Paul and St. George annually. St. Paul and St. George combine all northern fur seal subsistence into one report. NMFS subsequently posts these reports online (<https://www.fisheries.noaa.gov/alaska/marine-mammal-protection/northern-fur-seal-subsistence-harvest-estimates-and-reports>) and includes the relevant data in NOAA Technical Memoranda, the annual Alaska Marine Mammal Stock Assessment Report.

The subsistence reports from the tribal governments of St. Paul and St. George include the following information: 1) number, sex, and dates of fur seals harvested, 2) methods of gathering and herding of fur seals during the harvesting period, 3) environmental conditions, 4) cases of death due to hyperthermia, 5) occurrence of adult male and females fur seals harvested, 6) occurrence of flipper-tagged fur seals, 7)

⁵ <https://www.ecfr.gov/current/title-50/chapter-II/subchapter-C/part-216/subpart-F>

⁶ <https://www.ecfr.gov/current/title-50/chapter-II/subchapter-C/part-216/subpart-G>

number of fur seals entangled in marine debris and the number of seals disentangled, 8) health status of fur seals and oil contamination of pelts, 9) incidence of by-products and waste during the harvest process, and 10) research conducted during the harvest and visitors requesting to view the harvest.

NMFS published an interim final rule (RIN 0648-BN39) and request for comments to create an exception in 50 CFR 216.82 to authorize the use of trained and independently certified rodent detection dogs to detect and prevent the establishment of invasive rodents on the Pribilof Islands. Current regulations prohibit the landing of any dogs at the Pribilof Islands in order to prevent the molestation of the fur seal herds (50 CFR 216.82). NMFS has interpreted the molestation of the fur seal herds to include physical disturbance and disease transmission by a dog or its feces.

In the Interim Final Rule, NMFS describes the need to create the exception to the current regulatory prohibition by allowing the Regional Administrator to authorize the use of rodent detection dogs to respond to any incidents that could otherwise lead to the establishment of a rodent population on any of the Pribilof Islands. After careful review and consideration of public comments, NMFS has determined that landing independently certified and trained rodent detection dogs, subject to certain conditions to be imposed by NMFS, would not create any significant environmental risk to fur seals or other wildlife populations on the Pribilof Islands.

This information collection would apply to Pribilof Island landowners who apply for an exception to the dog prohibition at 50 CFR 216.82. A Pribilof Island landowner must submit a request for authorization to land a rodent detection dog on a Pribilof Island in writing to the NMFS Alaska Regional Administrator and must include the following information:

- (i) Independent certification by an accredited canine scent detection association, company, or organization that the dog has been trained for rodent detection;
- (ii) Certification that the dog will be under the constant voice, electronic, or leash control of a professional dog handler, or otherwise confined, while on the Pribilof Island;
- (iii) Proof that the dog has undergone any quarantine period required by the State of Alaska;
- (iv) Current immunization and health certifications required by the State of Alaska and NMFS Alaska Regional Administrator;
- (v) The number of dogs expected to be used;
- (vi) The professional dog handler's written plan for collecting and incinerating dog feces;
- (vii) The expected duration and location of rodent searches on the Pribilof Island; and
- (viii) Any other information requested by the Alaska Regional Administrator.

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.

This collection consists of subsistence reports submitted by the Tribal governments which may be submitted as an attachment to an email. The application for the exception under 50 CR 216.82 submitted by Pribilof landowners may be submitted as an attachment to an email. All submissions are anticipated to be electronic.

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 Question 2

The NMFS-contracted independent subsistence use monitors report annually and those reports are used to verify subsistence use reports by the Tribal governments. The purpose of this has been to ensure accurate reporting. It is anticipated that, as the Tribal government's self-reporting has been determined accurate and thorough, the independent monitoring will be phased out.

There is no centralized repository of independently certified rodent detection dogs, and each exception to search for invasive rodents on the Pribilof Islands is expected to be unique. No additional information collected as part of this information collection duplicates other collections.

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

The subsistence use of northern fur seals on the Pribilof Islands, Alaska, is for subsistence uses only. The existing regulation directly regulates the subsistence harvest of northern fur seals by Alaska Natives in the communities of St. George and St. Paul. The action regulates only the practices and behavior of individual subsistence fur seal hunters/harvesters on St. Paul and St. George Islands, none of whom meet the definition of 'small entity' under SBA criteria. The exception to authorize the deployment of invasive rodent detection dogs applies to landowners on the Pribilof Islands that includes two local Alaska Native Corporations, municipal, tribal, state and federal government agencies, and individual homeowners. The tribal and municipal governments are considered small entities. NMFS has met extensively with tribal governments of St. Paul and St. George Island since 2024 to determine the minimum information needs to authorize the exception.

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.

The regulatory requirement to collect subsistence reports was deemed necessary to improve recordkeeping and reporting efficiency and to make suspension and termination determinations under 50 CFR 216.72.

The application for an exception for rodent detecting dog rule (0648-BN39) would prevent the establishment of invasive rodents on the Pribilof Islands, thereby protecting the tourist economy, subsistence resources that contribute to food security and the mixed cash-subsistence economy, and public health costs from rodent-borne diseases. Entities that would be directly regulated by this rule are limited to any landowner who requests invasive rodent detection services and the service provider. Landowners on the Pribilof Islands include the Federal government, municipal governments of St. Paul and St. George, and TDX and Tanaq. In addition to private companies, other Federal agencies, such as the U.S. Department of Agriculture, may have rodent detection dogs available. NMFS Regional Administrator could not make determinations to issue an exception to land an independently certified rodent detection dog on the Pribilof Islands in the absence of the information provided by landowners in the application.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

NMFS published an interim final rule (RIN 0648-BN39) and request for comments to create an exception in 50 CFR 216.82 to authorize the use of trained and independently certified rodent detection dogs to detect and prevent the establishment of invasive rodents on the Pribilof Islands. This interim final rule included a request for comments on whether the proposed collection of information is necessary for the proper performance of the agency's functions, including whether the information shall have practical utility; the accuracy of the burden estimate; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information, including through the use of automated collection techniques or other forms of information technology. Any comments received in response to the interim final rule will be addressed in the final rule.

Prior to issuing the interim final rule, NOAA consulted with 3 tribal members and one employee of the Aleut Community of St. Paul Island, Tribal Government via email to obtain their views on the need for and practical utility of the data collected, the accuracy of the burden and frequency of collection, suggestions to minimize the burden, and ways to improve the clarity of instructions and forms. No comments were received.

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

This action requires the collection of information about the annual subsistence harvest of northern fur seals on St. George and St. Paul Islands and requests for an exception to the prohibition on landing dogs on the Pribilof Islands to detect and prevent the establishment of invasive rodents. NMFS funding through the Alaska Native Co-management Funding Program provides the opportunity for both the St. George Island Traditional Council and the Aleut Community of St. Paul Island Tribal Government to apply for grant funds to support subsistence harvest monitoring and reporting. Both Tribal governments have received funding in the past from NMFS to report the subsistence harvests of northern fur seals, and continue to submit annual funding proposals under the Alaska Native Co-management Funding Program.

No payment or gift is provided under this program.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The annual subsistence reports are submitted by Tribal governments and no system of record notice is

required. The landowner requests for exception to the dog prohibition is covered by SORN [NOAA-11](#)⁷, Contact Information for Members of the Public Requesting or Providing Information Related to NOAA's Mission. The privacy impact assessment for NOAA information system [NOAA4700](#)⁸ explains the security and privacy controls for this information. The information collected is not confidential.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

No information of a sensitive nature will be requested as part of this collection of information.

⁷ <https://www.commerce.gov/node/4985>

⁸ https://www.commerce.gov/sites/default/files/2025-03/NOAA4700%20PIA%20FY25%20SAOP_Approved.pdf

12. Provide estimates of the hour burden of the collection of information.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/ year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Northern fur seal subsistence reports	Tribal government of St. Paul Island, Biological Scientists	1	1	1	80	80	\$50.87	\$4,070
Northern fur seal subsistence reports	Tribal government of St. George Island, Biological Scientists	1	1	1	80	80	\$50.87	\$4,070
Application for an exception under 50 CFR 216.82	Landowner	1	1	1	20	20	\$35.92	\$718
Totals				3		180		\$8,858

*Hourly wage is based on the BLS's *Occupational Outlook Handbook* (<https://www.bls.gov/bls/blswage.htm>) using occupational code 19-1029 (Biological Scientists, All Other) for Alaska and 00-0000 (All Occupations) for landowners.

The estimated burden time for the application for an exception under 50 CFR 216.82 is not yet known, but NMFS determined that the necessary burden time could be as high as 20 hours in order to collect all required documentation. NOAA will seek feedback from landowners who submit applications to determine a more accurate burden time and will update future submission requests accordingly.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital costs or operating and maintenance costs associated with this information collection. All submissions are electronic so there are no miscellaneous costs to the respondents.

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 Commerce Alternate Personnel System (CAPS) [pay tables](https://www.commerce.gov/sites/default/files/2026-01/CAPS%20Standard%20Pay%20Tables%202026.pdf)⁹ for Alaska were used to determine the base salary for the federal positions. The upper bound for interval 3 of each position was used as the base and a multiplier of 1.5 was applied to calculate the loaded salary. There are two federal positions that support the Pribilof Islands Program of NMFS Alaska Region in addition to a contract to collect information regarding the subsistence use of northern fur seals on St. Paul Island. Costs include those for managing and reporting subsistence use of northern fur seals and administration of the contract.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-3	\$197,357	4		\$7,894
Other Federal Positions	ZP-4	\$277,329	4		\$11,093
Contractor Cost					
Awalix, LLC					\$78,278
Travel					0
Other Costs:					0
TOTAL					\$97,266

⁹ <https://www.commerce.gov/sites/default/files/2026-01/CAPS%20Standard%20Pay%20Tables%202026.pdf>

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Subsistence Hunt Report	0	1	0	1	0	40	These ICs are being removed and combined into a single IC, Subsistence Reports, to reflect the actual process. Previous submissions also calculated two annual reports (one for hunt and one for harvest) for each respondent, which was incorrect as St. George does not have a subsistence hunt.
Subsistence Harvest Report	0	2	0	4	0	160	
Subsistence Reports	2	0	2	0	160	0	Subsistence Reports contain hunt and harvest records.
Application for Exception for Rodent Detecting Dogs	1	0	1	0	20	0	New Requirement
Total for Collection	3	3	3	5	180	200	
Difference	0		-2		-20		

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.

NMFS will review the northern fur seal subsistence use reports received annually from the Tribal governments of St. George and St. Paul Islands. If any revisions or corrections are identified by NMFS in the reports, NMFS will request the revised reports prior to their publication online by NMFS. In addition, data extracted from the report will be referenced and used in NOAA's Technical Memoranda and the Alaska Marine Mammal Stock Assessment Reports.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NOAA Alaska Fisheries Science Center and Alaska Region will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

Information associated with applications for an exception to 50 CFR 216.82 will not be published.

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 subsistence use of fur seals report and the application for an exception to 50 CFR 216.82 do not use a form, and therefore will not show the expiration date.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).