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

Marine Mammal Marking, Tagging, and Reporting Certificates and Registration of Certain Dead Marine Mammal Hard Parts, 50 CFR 18.23(f) and 18.26
OMB Control Number 1018-0066

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.

Under section 101(b) of the Marine Mammal Protection Act of 1972, (MMPA) as amended, Alaska Natives residing in Alaska and dwelling on the coast of the North Pacific or Arctic Ocean may harvest polar bear (*Ursus maritimus*), northern sea otter (*Enhydra lutris kenyoni*), and Pacific walrus (*Odobenus rosmarus divergens*) for subsistence or handicraft purposes. Section 109(i) of the MMPA authorizes the Secretary of the Interior (Secretary) to prescribe marking, tagging, and reporting regulations applicable to the Alaska Native subsistence and handicraft take. Regulations at 50 CFR 18.26 permit the collection of certain dead marine mammal hard parts by non-Natives. Non-Natives may also collect bones, teeth, or ivory of any dead marine mammal from a beach or from land within ¼-mile of the ocean.

This collection of information allows us to track who has registered beach found hard parts and determine whether the take of marine mammal hard parts is legal. Without authority to collect this information, we would not be able to distinguish between Native legal harvests and non-Native collection. Acting on behalf of the Secretary, the U.S. Fish and Wildlife Service (we, Service, FWS) published regulations at 50 CFR 18.23(f) and 50 CFR 18.26(a)(b)(c)(d). These regulations require, among other things, that Alaska Natives and non-Natives report harvest or collection of marine mammals to the Service and have them tagged.

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.

We use the information collected from Alaska Natives to operate the Marking, Tagging, and Reporting Program (MTRP). This program improves our decision-making ability by substantially expanding the quality and quantity of harvest and biological data upon which we base future management decisions. Further, it provides us the ability to make inferences about the condition and general health of the populations. Without authority to collect this harvest information, our ability to measure the take of polar bears, northern sea otters, and walrus would be inadequate. Harvest information allows us to make rational, knowledgeable decisions regarding the Alaska Native harvest.

Alaska Native Harvest Reporting: We collect harvest information related to Alaska Native harvest to provide a chronology of the harvest in population modeling, determining which cohorts are being killed, determining the status of populations, and predicting population trends. We will use the collected information to gain insight into the distribution and relative abundance of the three species, the level and intensity of the harvest, and the harvest impacts on the species and their subpopulations. We do not place any additional reporting burden on the Alaska Natives. Service personnel or authorized Service representatives will obtain other information on the reporting forms without input from the Alaska Native hunter.

We use three Service forms to collect harvest information on Alaska Native harvest:

A. ***Form 3-2414, "Polar Bear Tagging Certificates"***: Form 3-2414 collects the following information:

- Date and location of tagging;
- Hide and skull tag number;
- Village hunted from (if different than tagging location);
- Age class and sex;
- Sex verified by tagger (yes/no) and sex identification information;
- Skull measurements (length, width, or not provided);
- Whether cubs were present with sow and if yes, how many cubs;
- Bear condition (obese, average, skinny);
- Specimens collected (tooth, hair, skin, liver, fat, muscle, skin/muscle, baculum/penis bone, or other);
- Research marks/tags (collar, ear tag number, lip tattoo, or other);
- Date and location of kill (to include latitude/longitude);
- Whether it was a conflict or problem bear and whether it was taken in defense of life;
- Hunter available for post hunt interview;
- Additional remarks; and
- Whether hunter is available for post hunt interview and phone number (with post inter-view questions:
  a. Was there a food source/attractant that the bear was interested in? What was the attractant?
  b. Was there any attempt to haze the bear to get it to leave?
  c. Was it believed that the bear could be a threat to people?

NOTE: We would only ask these typical post hunt questions if the biologist needed information on a bear that was marked as a problem bear. There is no standardized questioning.

B. ***Form 3-2415, "Walrus Tagging Certificates"***: Form 3-2415 collects the following information:

- Date and location of tagging;
- Village hunted from (if different than tagging location);
- MTRP tag number of plastic-headed wire tag used for left or right tusk;
- Type of take for walrus (LK = live killed, BF = beach found) – This information increases the accuracy of the known mortality and harvest data by discriminating between a walrus killed for subsistence purposes or found dead and salvaged. Requiring all ivory that has been taken or collected (pursuant to the Alaska Native exemption) to be marked, tagged, and reported simplifies Service enforcement efforts.
- Date and location killed/found;
- Age and sex;
- Walrus tusk length and circumference;
- Number of walrus harvested without tusks; and
- Additional remarks.

C. ***Form 3-2416, "Sea Otter Tagging Certificates"***: Form 3-2416 collects the following information:

- Date and location of tagging;
- Hide and skull tag number;
- FWS permit number;
- Age class and sex;
- Details identification information;
- Specimens collected (tooth, muscle vial, whisker, carcass, or other);
- Number of otters present in pod and number harvested from pod;
- Date and location of kill (to include latitude and longitude); and
- Additional remarks.

***Form 3-2406 (Non-Native Marine Mammal Certificate)*:** We also require non-Native collectors use *Form 3-2406, "Non-Native Marine Mammal Certificates."* The collection of this information via Form 3-2406 allows the Service to track individuals who register (within 30 days) beach found hard parts to determine whether the take of marine mammal hard parts is legal. We use the below listed information collected via Form 3-2406 to verify it is legal for the individual to retain the parts:

- Date and location of tagging;
- MTRP tag number of plastic-headed wire tag used for left or right tusk;
- Date found;
- Age and sex;
- Tusk circumference at gum line and tusk length from gum line to tip along front side following the curve of the tusk;
- Exact location of kill or find;
- Tag number for skull (polar bear or sea otter) or other part;
- Any information of interest about the beach found hard part collected;
- Other remarks; and
- Name, address, phone number, and date of birth of the person that collected the hard part.

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 forms are currently available in paper format only. We considered the possibility of using improved information technology to reduce burden on the Alaska Natives, but were unable to identify any such technology at this time. Much of the improved information collection and reporting technology that is commonplace in the contiguous 48 States does not yet reliably exist in coastal Alaska due to the remoteness and the social economic conditions in many of these communities.

The requested information is unique to each individual Alaska Native hunter, or non-Native collector, and no other sources are available. The information changes with each location and each animal killed or collected, and it is necessary for the individual hunter(s) and collector(s) to provide the required parts of each animal killed/collected and the information associated with those kills/finds. We have attempted to minimize the burden on Alaska Natives by establishing

a network of individuals in this program at strategic locations around the State. These individuals are in place to receive reports from Alaska Native hunters to minimize the necessary time for complying with these marking and reporting requirements. However, it is necessary for hunters to report in person each individual kill so that Service representatives can (1) attach marks and tags to the marine mammal parts and (2) collect information important for wildlife management purposes from the parts provided (e.g., measurements of polar bear and northern sea otter skulls and walrus tusks).

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.

We are not aware of the collection of any similar real-time information for these species and populations nor are we aware of any similar marking program currently in use.

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

This information collection 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.

If we did not collect the information, or collected it less frequently, we would be unable to census the entire harvest annually, or mark all available specimens for law enforcement purposes. Our capability to scientifically manage polar bear, Pacific walrus, and northern sea otter harvest in Alaska would be seriously compromised. If we did not require tagging of non-Native collected beach found hard parts, we would not be able to distinguish between Native legal harvests and non-Native collection. There is no information otherwise available for use in place of the information that we currently collect on the reporting forms.

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.

We ask respondents to report information more often than quarterly. The goal of the MTRP is to gather reports of all kills and to tag or mark, as appropriate, all skins, skulls, and tusks of marine mammals to reduce illegal trade in walrus ivory and polar bear and northern sea otter skins. Collecting information from non-Natives is required to inhibit illegal trade of marine mammal hard parts.

We use the data from the reports for management of polar bears, northern sea otters, and walruses. If these reports were submitted quarterly rather than as now required (i.e., within 30 days of take), the accuracy of the data would be seriously compromised, thereby reducing our ability to make sound management decisions. Increased illegal traffic of marine mammal parts could ensue.

There are no other circumstances requiring the collection of 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 May 29, 2026, we published in the *Federal Register* (91 FR 32084) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on July 28, 2026. We also published the *Federal Register* notice on Regulations.gov (Docket No. FWS-R7-MB-2026-1882). We received the following comments in response to that notice:

Comment 1: Electronic comment received from Victoria Lopez submitted via Regulations.gov FWS-R7-ES-2026-1882-0006 on July 20, 2026. The commenter requested the Service to protect polar bears, northern sea otters, and Pacific walruses.

> ***Agency Response to Comment 1:*** The commenter did not address the information collection requirements; therefore, no response is required.

Comment 2: Anonymous electronic comment submitted via Regulations.gov FWS-R7-ES-2026-1882-0007 on July 28, 2026. The commenter alleges that the agency is delaying ESA actions and failing to investigate marine mammal strandings they believe are linked

to the Vineyard Wind project. They urge enforcement under the ESA and MMPA, expand necropsy procedures, and action on the wood turtle.

> ***Agency Response to Comment 2:*** The commenter did not address the information collection requirements; therefore, no response is 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:

Organization	**Title**
Sea otter hunter/tagger	None
Sea otter hunter/tagger	None
Polar bear tagger	None
Walrus hunter/tagger	None
Sea otter hunter/tagger	None
Sea otter hunter/tagger	None
Walrus hunter/tagger	None
Walrus hunter/tagger	None
Sea otter hunter/tagger	None

"***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: Respondents agreed that the collection of information is necessary because it provides useful data on the number of animals harvested and the location where the harvest occurred. They indicated that the forms ask appropriate questions, have practical utility, and contain no unnecessary items. Overall, they feel that the forms are effective and capture the right information to maintain accurate harvest records.

> *Agency Response/Action Taken:* The agency thanks respondents for their feedback. Respondents confirmed that the information collected is necessary, practical, and includes only appropriate questions. No suggestions for changes were provided, so the agency is not making adjustments to the forms.

"The accuracy of our estimate of the burden for this collection of information"

Comments: Respondents indicated that the estimated burden for this information collection is accurate. They generally felt the time required was reasonable and either agreed with the estimate or expressed no concerns about it.

> *Agency Response/Action Taken:* The agency thanks respondents for their feedback. Respondents indicated that the burden estimate is accurate and did not propose any modifications. Because no changes were suggested, the agency is retaining the current burden estimate.

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

Comments: Respondents had no suggestions for improving the quality, utility, or clarity of the information collected. They indicated that no enhancements are needed.

Agency Response/Action Taken: The agency thanks respondents for their feedback. Respondents did not recommend any enhancements to the quality, utility, or clarity of the information collected. Since no changes were suggested, the agency will continue using the existing format.

And

"Ways to minimize the burden of the collection of information on respondents"

Comments: Respondents stated that there is no practical way to further reduce the time burden. Because tagging and reporting must occur in person, and the current process is already convenient for hunters, they felt no additional burden-minimizing measures are needed.

Agency Response/Action Taken: The agency thanks respondents for their feedback. Respondents stated that the current in-person tagging and reporting process is already convenient and did not suggest any burden-reducing measures. As no modifications were proposed, the agency is retaining the existing process.

Additional comments received during the outreach:

Comments: Additional comments indicated that respondents often leave the "Number of Otters in Pod," "Number of Otters Harvested from This Pod," and GPS latitude/longitude fields blank. Some respondents noted they are satisfied with the forms overall, and one commented that the current harvest certificate system effectively supports information collection for managing FWS species.

Agency Response/Action Taken: The agency thanks respondents for their feedback. Although some fields are occasionally left blank, respondents did not offer specific recommendations for changes. Because no modifications were suggested, the agency will continue monitoring these fields but is not proposing adjustments at this time.

Despite multiple attempts to contact respondents via email (initial and follow-up), as well as via phone, we did not receive a response from 1 of the 9 individuals contacted.

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

We do not provide 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 hunter must print his name and sign the certification containing harvest information, but we do not ask for social security numbers or other sensitive information. We ask for the following information from the non-Native collectors: name, date of birth, phone number, and address of the collector. This information is protected by provisions of the Privacy Act of 1974 and we will maintain the information in a secure system of records (INTERIOR/FWS-21, "Permit System," published January 12, 2024, 89 FR 2230.

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 **2,027 annual responses** totaling **507 annual burden hours**. We estimate the total dollar value of the annual burden hours is **$21,877 (rounded)**.

The Bureau of Labor Statistics May 2025 State Occupational Employment and Wage Estimates Alaska lists the mean hourly wage for persons in farming, fishing, and forestry occupations (45-0000) as $30.16. In accordance Bureau of Labor (BLS) News Release USDL-26-0827, June 12, 2026, Employer Costs for Employee Compensation—March 2026, we multiplied the hourly wage by 1.43 to account for benefits resulting in a total hourly cost factor of $43.13. This rate is likely high for most subsistence users.

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
Form 3-2414, "Polar Bear Tagging Certificate" (Individuals)							
Reporting	20	1.5	30	10 minutes	5	$ 43.13	$ 345.04
Recordkeeping				5 minutes	3		
Form 3-2415, "Walrus Tagging Certificate" (Individuals)							
Reporting	90	3.3	297	10 minutes	49	43.13	3,191.62
Recordkeeping				5 minutes	25		
Form 3-2416, "Sea Otter Tagging Certificate" (Individuals)							
Reporting	60	25	1,500	10 minutes	250	43.13	16,173.75
Recordkeeping				5 minutes	125		
Form 3-2406, "Non-Native Marine Mammal Tagging Certificate" (Individuals)							
Reporting	200	1	200	10 minutes	33	43.13	2,165.50
Recordkeeping				5 minutes	17		
TOTALS:	***370***		***2,027***		***507***		***$ 21,866.91***

*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 non-hour burden cost. The only foreseeable nonhour burden cost would be expenses associated with travel incurred by the Alaska Native hunters to comply with the rule. Since we have personnel or authorized representatives in individual villages or in nearby villages to do the actual marking and tagging, travel costs to Alaska Natives are not significant and in the majority of instances do not occur.

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 administer this information collection is **$372,266** ($305,766 in salaries and $66,500 in program costs).

To calculate salary costs, we used Office of Personnel Management Salary Table 2026-AK to obtain the most up-to-date wages for staff. In accordance with BLS News Release USDL-26-0827, we multiplied the salaries by 1.62 to calculate the fully burdened wages for each staff member. We estimated the percentage of time spent by each staff person annually to administer this information collection.

Position/Cost	Grade/ Step	Annual Wages	Fully Burdened Wages (x1.62 - rounded)	% of time working on MTRP	Total Annual Cost (rounded)
Salary Costs					

Wildlife Biologist - MTRP	GS-11/05	$ 95,700	$ 155,034	90%	$ 139,531
Wildlife Biologist - MTRP	GS-12/05	114,702	185,817	90%	$ 167,235
				Subtotal – Salary Costs:	***$ 305,766***
Other Program Costs					
Payments to Taggers					$ 50,500.00
Cost of Tags and supplies					$ 6,000.00
Travel					$ 10,000.00
				Subtotal – Other Program Costs:	***$ 66,500.00***
Total					**$ 372,266**

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

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.

We tabulate the results quarterly, for management purposes. Along with population census data, we make a determination if a population is depleted as defined in the MMPA. On occasion, we present summarized information at both internal and external technical and scientific meetings.

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.

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.