

Supporting Statement for Paperwork Reduction Act Submissions
Subsistence Study for Alaska
OMB Control Number 1010-NEW
Current Expiration Date: NEW

Terms of Clearance: None

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When statistical data is employed, Section B of the Supporting Statement must be completed. The Office of Management and Budget (OMB) reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. 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 United States Congress, through the 1953 Outer Continental Shelf (OCS) Lands Act (OCSLA) [Public Law 95-372, Section 20] and its subsequent amendments, requires the Secretary of the Department of the Interior (DOI) to monitor and assess the impacts of resource development activities in Federal waters on human, marine, and coastal environments. The OCSLA amendments authorize the Secretary of the Interior to conduct studies in areas or regions of sales to ascertain the “environmental impacts on the marine and coastal environments of the outer Continental shelf and the coastal areas which may be affected by oil and gas development” (43 U.S.C. 1346).

The National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321-4347) requires that all Federal Agencies use a systematic, interdisciplinary approach to ensure the integrated use of the natural and social sciences in any planning and decision making that may have an effect on the human environment. The Council on Environmental Quality’s Regulations for Implementing Procedural Provisions of NEPA (40 CFR 1500-1508) state that the “human environment” is to be “interpreted comprehensively” to include “the natural and physical environment and the relationship of people with that environment” (40 CFR 1508.14). An action’s “aesthetic, historic, cultural, economic, social or health” effects must be assessed, “whether direct, indirect, or cumulative” (40 CFR 1508.8).

The Minerals Management Service (MMS), under DOI, is the Federal administrative agency created both to conduct OCS lease sales and to monitor and mitigate adverse impacts that might be associated with offshore resource development. Within the MMS, the Environmental Studies Program functions to implement and manage the responsibilities of research. This study, North Aleutian Basin, and other future studies of coastal regions in Alaska, such as Bristol Bay, Cook Inlet, or Gulf of Alaska, will facilitate the meeting of DOI/MMS information needs on subsistence food harvest and sharing activities in various coastal Alaska areas.

Planning areas in Alaska can include up to and more than 50,000 square miles—large geographic areas with diverse, abundant, and environmentally sensitive resources. Within these areas, the DOI's Proposed OCS Oil and Gas Leasing Program considers that there will be an oil and gas lease sale in the future. These proposed sale areas or adjacent areas support major productive commercial and subsistence fisheries, provide habitat to numerous marine mammals, and are a significant migration and staging area for internationally important waterfowl. Numerous communities in the State of Alaska rely heavily on subsistence or commercial fisheries.

This information collection request involves a study that will assess the vulnerabilities of several coastal communities in Alaska, during various times, as to the potential effects of offshore oil and gas development on subsistence food harvest and sharing activities. It will investigate the resilience of local sharing networks that structure contemporary subsistence-cash economies using research methods that involve the residents of these communities most proximate to the future sale area(s).

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 MMS will use the information collected to gain knowledge about local social systems that will help shape development leasing strategies and serve as an interim baseline for impact monitoring to compare against future research in these areas. This study being conducted was requested by the Environmental Assessment section of the Alaska region specifically for use in future Environmental Impact Statements and Environmental Assessments. Without this data, MMS will not have sufficient information to make informed leasing and development decisions for these areas.

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].

No information pertaining to this information collection will be submitted electronically. Interviews will be done orally, face to face, in a setting that is comfortable for each respondent, such as the home or the workplace. This personal method is more expensive and time consuming. However, these drawbacks are outweighed by improvements in response rate, the quality of information obtained, and the rapport established between the interviewer and the interviewee. Telephone interviews have been found to be unsuccessful in rural Alaska.

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.

The goal of the study is to gather community and household-level harvest data and information about sharing networks using a valid instrument to help the MMS assess regional vulnerability to OCS oil development activities in the coastal areas of Alaska with regard to offshore subsistence resources. Specifically, it will explore and document through both qualitative and quantitative field methods the complex social dynamics of subsistence food harvest and distribution for residents of the various communities involved. For each community, it will establish a baseline description of current subsistence harvest and distribution practices for keystone species that will include: seasonal harvest levels, seasonal harvest areas, social mapping of household distribution networks, and the identification of approximate

ranges of variation across analytic categories. The study will also seek to collect comparable data on major cash economic inputs and social network distributions where appropriate in each community. In addition to community level analysis, the MMS is interested in developing a regional scale analysis of how subsistence activities differ by variables such as geographical location, ethnicity, socio-economic status, and access to commercial opportunities. Such information is not available from pre-existing data sets. Prior socioeconomic and subsistence studies have not taken into consideration sharing networks, and the economic base has changed radically away from a heavy emphasis on commercial fishing in the study communities.

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

Some individuals connected with small businesses may be interviewed, but the collection of information will not have a direct impact or impose a burden on small businesses.

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 MMS has minimized the burden on respondents as much as possible. To help respondents, the interviewer will ask all the questions, clarify if needed, and write the answers down. This will help the respondent by eliminating any confusion in how to answer, and will help the interviewer with consistent written responses.

At a meeting in 2006 that MMS sponsored, a group, that consisted of all key stakeholders from local tribal councils, communities, corporations, governmental and non-governmental organizations, identified over 30 studies that could provide useful information for future Environmental Impact Statements, analysis of potential mitigation of impacts, and post-sale needs, such as for use in NEPA reviews of exploration or development plans. Of those, this subsistence study has been identified as meeting a highly time-sensitive and decision-applicable information need.

Subsistence is a major and sensitive component of the social and economic system of the coastal areas of Alaska. Resident communities rely on the marine ecosystem for both fisheries employment and subsistence food harvest. Subsistence activities are also widely recognized as an important mechanism for maintaining traditional values such as kinship, respect for elders, hospitality to visitors, sharing, and healthy living. Thus, in rural Alaska, subsistence issues tend to dominate the public testimonial record. Expressed comments amply demonstrate the continued importance of subsistence activities to coastal communities and the persistence of their concern over potential impacts from oil and gas development on social and cultural continuity, including changes associated with regional population growth, altered habitat, or diminished food security. Of course, potential changes in the biogeography and productivity of commercial fish species are also major concerns for resident and non-resident groups that work in the Bering Sea fisheries. Among resident groups, there is a clear positive relationship between involvement in subsistence and involvement in commercial fishing, indicating that these two pursuits are tightly integrated. Thus, if the proposed collection of information does not occur, then decision-makers will not have current information about the advisability of pursuing oil and gas activities in Federal waters offshore coastal areas of Alaska.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

(a) *requiring respondents to report information to the agency more often than quarterly.*

Not applicable in this collection.

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Not applicable in this collection.

(c) requiring respondents to submit more than an original and two copies of any document.

Not applicable in this collection.

(d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years.

Not applicable in this collection.

(e) 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.

Not applicable in this collection.

(f) requiring the use of statistical data classification that has been reviewed and approved by OMB.

See Section B of the Supporting Statement.

(g) 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.

This collection does not include a pledge of anonymity not supported by statute or regulation.

(h) 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.

This collection does not require proprietary, trade secret, or other confidential information not protected by agency procedures.

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 3 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

As required by 5 CFR 1320.8(d), MMS published a 60-day review comment notice in the Federal Register on May 1, 2009 (74 FR 20329). In addition, the research team consulted with representatives of

the Nelson Lagoon community, the port Heiden community, the Akutan community, and the Sand Point community. No more than nine representatives were contacted. Public notification of the survey in each community will be made before interviewing begins. We received no comments in response to the Federal Register notice.

The respondents will also receive a cover sheet that displays the required Paperwork Reduction Act (PRA) statement. The statement will display the OMB control number, explain that respondents may comment on any aspect of the study including burden estimates, and will provide the address for sending comments to MMS.

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

Respondents will receive an honorarium for participating in the questionnaire. The primary reason to remunerate study participants is the need to reduce non-response within a small community in a cultural setting where a token of reciprocity for time commitment is expected. High rates of non-response would undermine the randomness of the study and introduce bias into the data. Remuneration is intended as an additional incentive to participate. Respondents will be remunerated at the rate of approximately \$40 for their interview. This is consistent with sociocultural expectations that currently exist in local communities throughout Alaska. Our estimate of the expenses to cover the respondent honorarium is \$5,120 total (128 respondents x \$40 = \$5,120).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The study is voluntary. The respondent will be asked questions by the interviewee who will also record responses. This study will be conducted in a face-to-face setting. The questionnaires will be administered under the guidelines of 45 CFR 46. The introduction that will be covered with each participant stresses that participation is voluntary and anonymity will be maintained. No names will appear on the study form, no photographs will be taken of any informant, and no videotaping will be conducted. Minor children and prisoners will not be interviewed. Once the study is completed, the connection between respondents and responses will be destroyed. Procedures designed to protect the anonymity of the information provided will include the use of coded selection and a identification number to protect the identities of respondents.

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.

This questionnaire will ask five potentially sensitive but routine questions on annual household income, unemployment, subsistence expenses, and household finances. One of these questions asks the views of the respondent about future potential oil and gas development. Questions such as these have been used in past studies in rural Alaska with few, if any, complaints. During the interviews, the respondents will be warned that sensitive questions are coming up and that they may refuse to answer any query they object to. Respondents will also be reminded that they are assured anonymity through the study design and process.

12. Provide estimates of the hour burden of the collection of information. The statement should:

(a) 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.

(b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

Potential respondents number approximately 128 from the total number of households. Given the small number of households, all will be interviewed. The frequency of responses submitted will be a one-time event for each study and responses are voluntary. In calculating the burdens, there was a pretest of the questionnaire with six individuals, and those interviews lasted approximately 1 hour. Since that pretest, some additional questions were added. The MMS estimates the total annual burden hours to be 192 (128 respondents x 1.5 hours per questionnaire = 192 total burden hours).

(c) 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. Instead, this cost should be included in Item 14.

The average respondent cost is \$40 per participant, for a total of \$5,120. Because the Bureau of Labor Statistics does not include Native Alaskans or living communities outside of Juneau or Anchorage, the \$40 honorarium was used (\$40 x 128 respondents = \$5,120).

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 shown in Items 12 and 14).

(a) The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life) and (2) 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]. 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.

(b) If cost estimates are expected to vary widely, agencies should present ranges of cost burden 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.

(c) 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.

We have identified no non-hour paperwork cost burdens to the respondents for this collection of information.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The study will be conducted by an independent contractor. The current contract was awarded through a competitive procurement process. The amount budgeted for the study is \$339,793. This amount includes costs for staff labor, honoraria, and travel. The annualized cost will be approximately \$113,000, which is derived from approximately 1 year to develop the study instruments and at least 2 years estimated to conduct the questionnaires and analyze the data.

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

This is a new information collection resulting in a program increase of 192 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.

The results of the data collection will be tabulated for presentations in two different public forums. One forum is publication of the findings in refereed scientific journals that are appropriate for the research topic (e.g., Society and Natural Resources or Arctic). The other forum is to the tribal councils of participating communities.

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.

No, MMS will display the expiration date of the OMB approval on the PRA statement given to each respondent.

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

To the extent that the topics apply to this collection of information, we are making exceptions to the Certification for Paperwork Reduction Act Submissions; see Part B of the supporting statement.