

Supporting Statement for Paperwork Reduction Act Submissions
Study of Sharing to Assess Community Resilience
OMB Control Number 1010-xxxx
Current Expiration Date: mo/day/year

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 Lands Act (OCSLA) [Pub. L. 95-372, section 20] and its subsequent amendments, requires the Secretary of the US Department of the Interior (USDOI) 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 USDOI/Minerals Management Service (MMS) 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 involves a closer examination of subsistence food sharing behaviors than has been undertaken previously in Alaska. It will seek to investigate and explain more fully the intricate social dynamics of contemporary subsistence food resource distribution and consumption patterns for residents living near offshore oil and gas operations in the northern most parts of Alaska exploration regions. It will seek to provide an empirical basis from

which to quantify food sharing behaviors and to assess the plausibility of hypothetical linkages between regional oil development activities and changes in the distribution or consumption of subsistence resources over time and geographic space. A previous MMS-sponsored survey focused on subsistence and sharing activities of the south and southwest Indigenous coastal communities of Alaska proximate to Bristol Bay.

Previous MMS studies have documented aspects of subsistence harvest throughout coastal Alaska, including information about household subsistence harvests by quantity, location, species, and month of harvest. However, most of these studies are limited to representing the importance of subsistence to livelihoods in measures of pounds per capita harvested or average per capita harvest. The study departs from this standard approach by systematically examining the complex social dynamics of sharing and consuming resources after resources have been harvested. In Alaska Native communities, the distribution and exchange of subsistence resources operate under traditional institutions (informal rules; codes of conduct) for reciprocity in exchanging harvested resources and the cultural obligation to share. Changes in ecosystem services, which may result from industrial development and climate change, could affect subsistence activities with related effects on community sharing networks. This research will make an important contribution to the study of northern subsistence by providing baseline quantitative data on the structure of sharing networks and by identifying the characteristics of system components and key nodes of networks. From the findings of the empirical data, we will model thresholds of change in community food distribution networks to assess communities' vulnerabilities and resilience.

The 36-month study involves assessing the vulnerabilities of two North Slope and one interior Alaska village to the potential effects of offshore oil and gas development on subsistence food harvest and sharing activities. We will investigate the resilience of local sharing networks that structure contemporary subsistence-cash economies, using survey research methods that involve residents of the three Alaskan communities.

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 information to be gathered is intended to inform regulatory agencies, academic researchers, and partner communities about local social systems in a way that can shape development strategies and serve as an interim baseline of the National Environmental Policy Act of 1969 analyses (Environmental Impact Statements' and Environmental Assessments') for impact of oil and gas activities monitoring for comparison in the future.

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 interviews for each survey will be done orally, face to face, in a setting that is comfortable for each respondent, such as the home, the workplace, or a community venue (such as the local community center). 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.

This study will specifically pursue the following sets of information in select communities:

- 1) A detailed ethnographic description of the varieties and types of food distribution mechanisms in the community, with residential accounts of how those mechanisms may have changed over time.
- 2) A contemporary social map of subsistence food distribution channels that identifies significant household networks and specifies the size, frequency, and type of food portions that shared through the community from harvest to consumption;
- 3) A thorough analysis of collected data that identifies key nodes and thresholds in the distribution network that could be vulnerable to disruption from industrial development.

Although another MMS Alaskan information collection effort also focuses on the dynamics of sharing, it is separated geographically by about 1,000 miles and culturally, in that it focuses on Aleuts and this will focus on Iñupiat Eskimo. This survey instrument is also unique in subtle ways to extract more detailed information on the value of exchanging goods and services in a hunting and gathering society. The survey instrument contributes to anthropological theory and overall development of accurate baseline data for NEPA efforts through describing the types of food sharing that occur and the different ways sharing contributes to the provisioning of households. These categories include a focus on:

- 1) a household's own hunting,
- 2) the shares of food that households bring in as a result of cooperative hunting efforts,
- 3) the shares of food that households receive based on their in-kind contributions to the hunting of others (e.g. food and fuel),
- 4) the sharing of foods that occur between households once food has entered a household, and
- 5) exchanges and trading of food that occurs between households.

This approach to studying subsistence networks is distinctive and goes into greater detail than any previous effort. The study also seeks to collect comparable data on major cash economic household inputs and social network distributions where appropriate in each Arctic community. Such information is not available from pre-existing surveys.

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

Households are the unit of analysis of the survey. 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 study is undertaken in cooperation between MMS and University of Alaska Fairbanks (UAF) to build upon previous research and illuminate potential effects of oil and gas (O&G) development on the subsistence food production systems of coastal villages of Alaska. In anticipation of O&G development, there is a need to identify measurable social indicators of change that are sensitive and important at the community level. Related to the question of social indicators is the challenge to determine what changes

can be predicted and how they can best be measured and assessed for significance. O&G development in the North Slope Borough of Alaska may have single, additive, and cumulative effects on the social-ecological systems of which Iñupiat communities are a part. These effects may include changes in:

- 1) the abundance and distribution of wildlife resource and people's access to them,
- 2) cash economic inputs to the community through changes in employment and/or transfer payments,
- 3) patterns in subsistence resource sharing, which may affect resource consumption, diet, and health of individuals,
- 4) quantity and quality of time available for on-the-land activities,
- 5) transmission of cultural traditions, and
- 6) people's sense of well being. Rate of change is an additional variable to be considered in assessing these effects as well as the organizational capacity of communities to respond in ways that support current and future community needs and goals.

This information for identification of effects upon local communities will enable the Federal government to construct more effective mitigation and monitoring efforts in the event that subsistence resources are diminished or disrupted by oil and gas exploration and development.

Advancement is needed in the development of methods to assess the vulnerability of local communities to the impacts of oil and gas development development. The study is intended to help address these concerns and fill the gap.

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 confidentiality 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 January 12, 2010 (75 FR 1648). The MMS received three comments from the same person. None of the comments were germane to the paperwork burden of the collection. In addition, the contractors have initiated consultation with the Wainwright Traditional Council, the Native Village of Kaktovik Village Council, and the Venetie Village Council to obtain community engagement and project endorsement. Public notification of the survey in each community will be made before the interviewing begins. "Project steering committees" appointed by local council members have been established to advise the research team on its strategy for carrying on the project.

The respondents of the survey will also receive a one-page description of the project that notes the required Paperwork Reduction Act statement. The statement will display the OMB control number, explain that respondents may comment on any aspect of the survey including burden estimates, and will provide the address to which comments may be sent 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 survey participants is the need to reduce non-response within a small community in a cultural setting, and where a modest honorarium for time commitment is expected. High rates of non-response would undermine the survey effort and introduce bias into the data. Remuneration is intended as an additional incentive to participate. Respondents will be remunerated at the rate of \$50.00 per hour of interview, not to exceed \$100 per interview. This payment approach of honoraria is consistent with

the expectations of local residents throughout rural communities of Alaska. Our estimate to cover the respondent honorarium is \$26,200 (349 households x 1.5 hours = 524 (rounded) interview @ \$50/hr = \$26,200).

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

The survey is voluntary. 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 that anonymity will be maintained. No names will appear on the survey form and the project's final reports will not link what people say with names. Minor children and prisoners will not be interviewed. Procedures designed to protect the confidentiality of the respondents' names and information includes the use of coded selection and identification numbers 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 survey will ask a series of potentially sensitive but routine questions on annual household income, unemployment, subsistence expenses, and household finances. A set of questions will ask about how the community will respond to possible future changes. Respondents will be reminded that they may refuse to answer any query they object to and they are assured anonymity through the survey 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 number of households is approximately 349 from the three partner communities. We seek to interview the "head" of each household, and in some cases that may be two people. In calculating the burdens, there was a pretest of the questionnaire with no more than nine individuals and those interviews lasted approximately 1 hour. Since that pretest, some additional questions were added. The MMS estimates the total burden hours to be 524 (349 respondents x 1.5 hours = 523.5 hours rounded).

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 \$50 per hour/per participant, not to exceed \$100, for a total of \$21,763. Because the Bureau of Labor Statistics does not include Native Alaskans or living communities outside of Juneau or Anchorage, the \$50 honorarium was used (349 respondents x 1.5 hours = 524 hours (rounded) x \$50 per hour = \$26,200.

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 project was awarded to the University of Alaska Fairbanks through a cooperative agreement through the North and West Cooperative Ecosystems Unit, involving UAF and MMS. The total amount of the project award is \$784,712.00. This cost includes staff labor, staff travel to villages and meetings, and participants fees, as well as indirect costs and overhead for the University of Alaska Fairbanks. The participants' category covers informant fees, hiring of village enumerators and travel to project workshops by village representatives. Therefore, the annualized cost to the government is estimated at \$261,571.

Annualized costs and activities

Year 1		Annualized cost
Develop and pre-test survey; Create relationships with villages		\$322,399.00
Year 2		
Strengthen relationships w/villages; Form steering committees; Administer household survey		\$247,299.00
Year 3		
Analyze data; Disseminate findings to villages; Write reports and scientific papers		\$215,014.00
Total cost - \$784,712.00		

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

This is a new information collection resulting in a program increase of 437 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 timing of data collection will be coordinated with partner communities and will be initiated as soon as OMB approval is received. The results of the data collection will be tabulated for presentations at two different public forums. One forum is the publication of the findings in refereed scientific journals that is appropriate for the research community (e.g. the Arctic; Journal of Applied Anthropology). The other forum is to the village councils and residents of the 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.

The expiration date of the OMB approval will be displayed 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 not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”