

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Southern Alaska Sharing Network and Subsistence Study**  
**OMB Control Number 1010-0181**  
**Current Expiration Date: February 28, 2013**

**Terms of Clearance:** The terms of clearance instructed BOEM not to conduct household surveys in Alaska until after May 29, 2010, to avoid interfering with the then national census. **Response:** BOEM has complied with this instruction.

### **General Instructions**

A completed Supporting Statement A 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 below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked “Yes,” then a Supporting Statement B must be completed. 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.***

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 lease 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 affect 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).

Executive Order 12898 of February 11, 1994 on Environmental Justice requires that Federal agencies consider the impacts of any action of disadvantaged, at risk and minority populations. To evaluate these impacts, information about the vulnerability of certain stakeholders must be better understood. Indicators of vulnerability can include but are not limited to income, race/ethnicity, household structure, education levels, and age. Although some general information related to this issue is available through census and other quantitative data, these sources do not disaggregate those individuals or groups that are subsistence harvesters or those affected by changes through oil and gas exploration and development. Therefore,

other types of data collection tools must be utilized to gather information related to Executive Order 12898.

The Bureau of Ocean Energy Management (BOEM), under DOI, is the Federal agency that both conducts OCS lease sales and monitors and mitigates adverse impacts that might be associated with offshore resource development. Within BOEM, the Environmental Studies Program implements and manages the responsibilities of research. This study of southern Alaskan communities, including Cook Inlet, will facilitate the meeting of DOI/BOEM information needs on subsistence food harvest and sharing activities in various southern coastal Alaska areas. BOEM has another Alaska survey collection (1010-0184) that focuses on different species and different communities.

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 southern 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).

This survey was originally conducted during 2009-2011 in the communities most proximate to the North Aleutian Basin. With this submission, we are requesting approval to conduct this survey in other southern Alaskan communities, particularly the Cook Inlet area. Therefore, this survey was slightly modified to reflect the species and conditions of the study area.

***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.***

BOEM will use the information collected to gain knowledge about local subsistence use that could potentially be affected by OCS oil and gas development, as well as the social systems that will help shape the development of leasing strategies, reduce conflict, and serve as an interim baseline for impact monitoring to compare against future research in these areas.

This study identifies key areas that local people from each community use for harvesting subsistence foods; analyzes sharing networks; and identifies sharing networks that are most vulnerable to change. Questions are grouped by categories.

Questions about plant and animal species represent the full range of subsistence harvest and will identify keystone species and consistency through time. Some questions are specifically designed to assess harvesters' observations about wildlife health. Wildlife health, such as skin nodules, hair loss, fat, deformities and the like may or may not be linked to the amount harvested.

Some questions are deliberately designed to obtain fine-grained detail regarding subsistence equipment

and networks to assess the cooperative nature (ownership of and sharing of equipment) of the hunt and the exchange of subsistence food for support from individuals participating in the subsistence network who receive subsistence food. These are individuals who receive subsistence harvest but do not necessarily engage in the actual food quest. These household support networks play a key role in supporting active subsistence harvest in exchange for meat harvested.

Questions about sharing networks represent a full range of indirect effects on persons too aged to engage in subsistence harvest or live in other communities but rely on locally obtained subsistence resources through kin and social connections. Also represented are the strength or weakness of the trading network. They evidence the strength of social bonds that continue to unite groups in spite of distance.

Questions on the stability of this sharing network are important. Social network analysis is very new and not well understood. This research effort strives to arrive at culturally appropriate and relevant mitigation and monitoring measures to facilitate local adaption to changes underway in the sub-Arctic. Other Arctic nations, as well as Federal policy makers, want and need to understand what mitigation measures work, and studies on the stability of sharing networks support NEPA goals. Under 50 CFR 1508.14, “When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment.” Therefore, an action’s—such as offshore oil and gas activity—cultural, economic, social or health effects must be assessed (40 CFR 1408.8). Information collected on the sharing networks of these communities is essential to fully assess the cultural and social effects of oil and gas activities on these populations and their subsistence way of life.

This study was requested by the Environmental Assessment section of the Alaska Region specifically for use in future [BOEM Environmental Impact Statements and Environmental Assessments under NEPA](#). Without this data, BOEM will not have sufficient information to make informed leasing and development decisions for southern Alaska. It should be noted that the Cook Inlet region is already undergoing stresses associated with climate, economic, and social change.

The information from this study is important in assessing effects throughout the social system. This information will be used to assess potential effects of proposed oil and gas development projects on the social system of the Alaska Native people. It will be incorporated as baseline information that can be analyzed under various scenarios, including cumulative effects to obtain a deeper understanding of how project approval might result in sociocultural impacts on a culture that is different from that enjoyed by most U.S. residents.

***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 BOEM assess regional vulnerability to OCS oil and gas exploration and development activities in the coastal areas of southern Alaska with regard to offshore and coastal subsistence resources. Specifically, it explores and documents—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 establishes 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 also seeks to collect comparable data on major cash economic inputs and social network distributions where appropriate in each community. In addition to community level analysis, BOEM 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.

Most of this information is not available from pre-existing data sets. Prior socioeconomic and subsistence studies have not considered sharing networks, and the economic base has changed radically away from a heavy emphasis on commercial fishing in the study communities. However, to ensure avoidance of any duplicate reporting, BOEM has done extensive research into other DOI studies of Alaskan Native communities and has found that FWS also maintains a collection that could pose some overlap with BOEM's target communities or potential survey questions.

The FWS Alaska Migratory Bird Subsistence Harvest Study (1018-0124) contains similar questions on the harvesting of migratory birds and gathering of eggs for some potentially overlapping communities. The FWS indicated that the data are not collected for every species every year, but that the numbers have been stable enough so they are considered reliable. Therefore, BOEM will be dropping questions on harvesting migratory birds and eggs (waterfowl and seabirds) from our survey instrument and will instead seek that data from the FWS and Alaska Department of Fish and Game.

BOEM and NMFS work closely together on Arctic research. The BOEM Environmental Studies Program funds many of NMFS' marine mammal studies in Alaska BOEM will make the final report of this sharing and subsistence survey available to NMFS and all its program associates.

**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.**

BOEM 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 technique will help the respondent by eliminating any confusion in how to answer and will help the interviewer with consistent written responses.

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. 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 Cook Inlet area fisheries. Among resident groups, there may be a positive relationship between involvement in subsistence and involvement in commercial fishing, indicating that these two pursuits could be tightly integrated. Thus, if this 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.**

Not applicable in this collection.

**(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 pledges confidentiality supported by the Privacy Act of 1974. A System of Records Notice is being developed covering this information collection and defining the conditions of disclosure allowed by the Act and the routine uses the Department will follow. The contract implementing this collection will incorporate the Privacy Act clauses prescribed in the Federal Acquisition Regulation, including the data security policies and handling restrictions to which the contractor must adhere. Any data shared with other agencies will be stripped of personal names and the ability to identify individuals.

***(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. 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), BOEM published a 60-day review comment notice in the *Federal Register* on August 22, 2012 (77 FR 50712). We received one comment in response. The Marine Mammal Commission commended BOEM for including science-based assessments of subsistence food harvest and sharing activities in Alaskan communities as part of its Environmental Studies Program and therefore supports the collection of information.

In the spring of 2012, the research team returned to the surveyed communities and consulted with representatives in the communities of Nelson Lagoon, Port Heiden, Akutan, and False Pass to discuss the survey process and results. Community feedback was sought, and these meetings were conducive to discussion and observations about the survey. The representatives had no comments regarding the availability of data, frequency of collection, clarity of instructions, and elements being collected. No more than nine representatives were consulted.

The research team will consult with each community entity (municipal, tribal, or both) in the new study area to gain written community support before the effort begins. The survey team will contact no more than nine representatives. Public notification of the survey in each community will be made before interviewing begins.

The respondents will also receive a cover sheet that displays the required Paperwork Reduction Act (PRA) statement and the Privacy Act, if required. 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 BOEM.

***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 \$21,920 total (548 respondents x \$40 = \$21,920).

**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 questionnaire will be administered under the guidelines of 45 CFR 46 when applicable. The information collected in this survey is covered by the Privacy Act of 1974. The introduction that will be covered with each participant stresses that participation is voluntary and confidentiality will be maintained to the extent allowed by law and that the respondent can choose not to answer a question or may withdraw from the survey before the questionnaire is completed. No personal names, birthdates, or social security numbers will be collected on the survey form. No recognizable photographs will be taken of any informant, and no videotaping will be conducted. Minor children and prisoners will not be interviewed. Procedures designed to strengthen protections and maintain confidentiality of the information provided will include the use of coded selection and an identification number to protect the identities of respondents. Currently, BOEM, in conjunction with the DOI Privacy Office, is conducting a privacy impact assessment (PIA) on this collection and developing a System or Records Notice (SORN). BOEM will complete the PIA and implement the SORN before conducting the survey.

**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 asks a few potentially sensitive but routine questions on the annual income range for the household, subsistence expenses, and household expenses. 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 informed that sensitive questions are coming up and that they may refuse to answer any query they object to. Respondents will also be reminded that their information will be kept confidential in accordance with the Privacy Act and 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.***

We estimate approximately 548 respondents from the total number of households in the study area. 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. Based on the actual surveys conducted in the North Aleutian Basin communities and the modification of the instrument to address the specifics of the new communities, BOEM estimates each survey to last approximately 45 minutes. The BOEM estimates the total annual burden hours to be 411 (548 respondents x .75 hours per questionnaire = 411 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.***

The total annual hour burden is estimated at 411 hours. Therefore, we estimate the dollar value of the annual burden hours to be \$12,741. The BLS lists the 2011 mean hourly wage for persons in farming, fishing, and forestry occupations in Alaska at \$22.33 ([http://www.bls.gov/oes/current/oes\\_ak.htm#45-0000](http://www.bls.gov/oes/current/oes_ak.htm#45-0000)). We multiplied this by 1.4 to account for benefits in accordance with release USDL 12-1830, September 11, 2012. ( $\$22.33 \times 1.4 = \$31$  [rounded]  $\times 411 = \$12,741$ )

***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).***

***(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.**

The study will be conducted by an independent contractor. The current contract was awarded through a competitive procurement process. We expect the contract for the upcoming survey to be the same. The amount budgeted for the study is \$450,000. This amount includes costs for staff labor, honoraria, and travel. The annualized cost will be approximately \$150,000, which is derived from approximately one year to conduct the survey, one year to analyze the data, and one year to write a final report and peer reviewed journal article.

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

The current inventory is 192 hours. With this renewal we are requesting a total of 411 burden hours—a net increase of 219 hours due to (1) a program decrease of 48 hours based on BOEM eliminating questions on harvesting migratory birds and eggs and (2) a program increase of 267 hours based on the changed survey area and the increased number of households that will be interviewed. There are no non-hour cost burdens associated with this collection.

**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.**

The BOEM 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.