

# Supporting Statement A

## Southwestern Crown Collaborative Forest Management Social Monitoring

### OMB Control Number 0596-NEW

#### 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 Collaborative Forest Landscape Restoration Program (CFLRP) is a USDA program started in 2010 to encourage collaborative groups of neighboring landowners, state, local and tribal government representatives, businesses, interest groups, and nonprofit organizations, to work with the Forest Service to find common ground pertaining to geographically extensive forest restoration. The Southwestern Crown Collaborative (SWCC) is one of 23 Collaborative Forest Landscape Restoration (CFLR) projects across the nation currently. In the SWCC, collaborators and other partners work with the Forest Service to implement restoration work and multi-party monitoring of the restoration across four counties, and three National Forests.

The Forest Landscape Restoration Act (FLRA) of 2009 (16 U.S.C. §7303), which enabled the CFLRP, *requires* monitoring “to assess the positive or negative ecological, social, and economic effects of projects implementing a selected proposal for not less than 15 years after project implementation commences.” The proposed information collection will help meet the SWCC’s obligation for monitoring the social impacts on residents and stakeholders of activities conducted under the CFLRP. It is critical for managers to understand the social impacts of their decisions to allow for adaptive management and improve future outcomes. The scope of the survey includes residents of communities within and adjacent to CFLRP landscapes and collaborative participants.

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#### Legal Justification:

- **National Environmental Policy Act as amended in 1982 (Sec 102 [42 U.S.C. § 4332A])**  
*The Federal Government shall utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man's environment*

- **The Forest Landscape Restoration Act (Title IV of the Omnibus Public Land Management Act of 2009 P.L. 111-11).**

*MULTIPARTY MONITORING- The Secretary shall, in collaboration with the Secretary of the Interior and interested persons, use a multiparty monitoring, evaluation, and accountability process to assess the positive or negative ecological, social, and economic effects of projects implementing a selected proposal for not less than 15 years after project implementation commences..*

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**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information collection methods used will be:

1. Mail and Electronic Monitoring Survey: Respondents will be given the option of completing an online version of the monitoring instrument; those choosing not to respond online will be given the option of completing a paper version.
2. Non-response checks: Data will be analyzed for non-response bias and a small subset of respondents will be sampled via phone and asked a small number of monitoring questions (< 5 minutes each).

This is a new collection that will be conducted by the University of Montana's *Bureau of Business and Economic Research* (BBER) in conjunction with UM's *College of Forestry and Conservation*. The purpose is twofold: 1) to meet our obligations under the CFLRP to monitor social impacts, and 2) to provide feedback to Forest Service managers about the activities, including the decision making processes, conducted under the CFLRP. Through an adaptive management process recommended by the authors of the FLRA, this information can be used to improve processes and actions on future restoration projects. The results will be analyzed and published in a final report available for use by federal and state policy makers and by the general public. Agency public affairs staff, social scientists, and economists may also use this information. Agency, academic, and other researchers may cite results or data.

The purpose of non-response checks is to compare respondents to non-respondents across known variables (e.g. year-round vs. seasonal residences) and ensure there is no non-response bias. This will be done two ways. First, we will analyze data along census variables to ensure results are representative of residents in the area and can be generalized with confidence. This can be done without a follow up survey, simply by using census or cadastral data. Second, we will call a subset of non-respondents and ask them a subset of monitoring questions.

**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.**

We will give all respondents an initial opportunity to complete the survey online. Past research suggests approximately 15-25 percent of local residents will respond to online surveys. Those residents not responding to the online survey will be given an opportunity to complete the monitoring instrument via mail. The full monitoring process will begin with a pre-survey notice mailing which will include a unique URL where respondents may complete the survey online, powered by the program *Qualtrics*. After responses to this online option diminish, we will mail respondents a hardcopy of the monitoring instrument with a postage-paid return envelope.

**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 effort attempts to be sensitive to any duplication of efforts being done by other entities. We are aware of only one CFLRP project that has conducted a survey of its residents about similar topics. That effort was conducted without federal funds and asked questions specific to that landscape which are not applicable to the SWCC CFLRP area. In the past, some research has been conducted by Universities or Non-Government Offices (NGO) that included surveys of forest management, however these were not specific to the effectiveness of the CFLRP and therefore do not help the SWCC adaptive management approach nor do they help meet the social monitoring requirements of the FLRA. No other data collection of this nature has taken place in the SWCC project area which could supply this monitoring information.

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

This data collection will 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.**

Without the collection of this information the USFS will be unable to meet the social monitoring requirements in the Forest Landscape Restoration Act. Not collecting this information will prevent managers from determining the effectiveness of the CFLRP at accomplishing its social goals. This

monitoring information is critical for fully incorporating partner and public input into forest project, implementation, monitoring and/or planning processes. The consequences of not implementing this program will fundamentally reduce our ability to produce data needed for decision making and planning and undermine the adaptive management approach suggested by the FLRA. We have not identified any technical or legal obstacles to reducing burden.

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

- i. requiring respondents to report information to the agency more often than quarterly;**
- ii. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- iii. requiring respondents to submit more than an original and two copies of any document;**
- iv. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- v. 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;**
- vi. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- vii. 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**
- viii. 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 request contains no special circumstances with respect to items (i, iii-vi, and viii). Following the Dillman Method (2014)<sup>1</sup>, we will ask respondents to respond to the survey within two weeks of receipt (item ii). We will not provide assurance of confidentiality to respondents (item vii). We will assure respondents that data collected will only be reported in aggregates and no individually identifiable responses will be reported.

**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.**

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<sup>1</sup> Dillman, D.A. and J.D. Smyth. 2014. Internet, Mail and Mixed Mode Surveys: The Tailored Design Method, fourth ed. John Wiley and Sons, Inc., Hoboken, New Jersey.

**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.**

In accordance with 5 CFR 1320.8(d), on March 3, 2017, a 60-day notice for public comment was published in the Federal Register (FR Vol 82 Pages 12428-12429). One comment was received and a response for the public record was written. The public comment did not address the survey directly and no changes were made to the survey.

The SWCC has worked with social scientists at the University of Montana to determine no data exists which could meet these needs. Review of the survey instrument was also conducted by three professional peers, two of which are social scientists at other institutions and one of which is a former Forest Service District Ranger. Adjustments were made to the survey prior to testing based on comments received. Testing of the survey instrument using local residents was conducted (described in Supporting Statement B).

**Reviewers**

Albert Luloff	Penn State University (emeritus)
Allison Reeves Jolley	Sierra Institute
Tim Love	USDA Forest Service (retired)

This is a new collection and does not involve working with individuals that regularly submit information to the agency.

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

No payments or gifts will be provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance**

**in statute, regulation, or agency policy.**

We will not provide assurance of confidentiality to respondents. We will assure respondents that data collected will only be reported in aggregates and no individually identifiable responses will be reported. In addition to residents within our landscape, the survey will be emailed to stakeholders who have shown interest in the SWCC. This email list is maintained by the SWCC Coordinator and not made publicly available.

**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.**

No questions of a sensitive nature will be asked.

**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. Instead, this cost should be included under "Annual Cost to Federal Government."**

This collection will include the option to complete an online survey or an identical mail-back survey. We assume it will take 20 minutes to read the instructions and complete either survey. We have two target populations: residents within the Southwest Crown CFLRP landscape (4,429 occupied dwellings) randomly sampling 2,200 households from a list of addresses from this population, and Collaborative participants (150 participants on email list).

For the resident population, we will attempt to get 600 completed surveys from a sample of 2,200 addresses. We expect 10% undeliverable addresses reducing the sample to 1,980 addresses. We expect

an initial 30% response rate (594 completions) and will conduct a non-response check by mail (200 additional mailings) to reach the 600 completed responses. We estimate that the 1,380 resident population non-respondents will spend on average 3 minutes considering the materials we mail them.

For the universe of collaborative participants, we will send an email with a link to the survey to all 150 individuals on our collaborative email list. We will treat this as a population not a sample. We expect at least 75% response rate for 113 responses and 37 non-responses.

We estimate the total burden hours to be 320 hours. Our estimate is based upon our experience with similar collections. Table 1 summarizes the estimate of annual burden hours.

Table 1: Estimate of Annual Burden Hours

(a) Description of the Collection Activity	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Online and Mail Surveys - 1,980	594	1	594	20 minutes	198
<i>Non-responses</i>	<i>1,386</i>	<i>1</i>	<i>1,386</i>	<i>3 minutes</i>	<i>69</i>
Non-response checks - 200	6	1	6	20 minutes	2
<i>Non-responses</i>	<i>194</i>	<i>1</i>	<i>194</i>	<i>3 minutes</i>	<i>10</i>
Collaborators -150	113	1	113	20 minutes	38
Non-respondents	37	1	37	3 minutes	2
<b>Totals</b>	<b>2,330</b>	<b>---</b>	<b>2,330</b>	<b>---</b>	<b>320</b>

We estimate the cost to respondents to be \$11,133. This wage figure includes a benefits multiplier and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-15-1132 for Employer Costs for Employee Compensation— December 2016 at - <http://www.bls.gov/news.release/pdf/ecec.pdf>, dated March 17, 2017). Table 2 summarizes the annual cost to respondents.

Table 2: Estimate of Annualized Cost to Respondents

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Surveys	198	\$34.90	\$6910

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Non-responses	69	\$34.90	\$2408
Non-response checks	2	\$34.90	\$70
Non-responses	10	\$34.90	\$349
Collaborators	38	\$34.90	\$1326
Non-respondents	2	\$34.90	\$70
<b>Totals</b>	<b>319</b>	<b>---</b>	<b>\$11,133</b>

\* Bureau labor statistic (from news release USDL-15-1132 for Employer Costs for Employee Compensation— December 2016 at - <http://www.bls.gov/news.release/pdf/ecec.pdf>, dated March, 17, 2017)

**13. Provide an estimate of the total annual non-hour cost burden to respondents or record-keepers 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 are no non-hour burden costs resulting from the collection of this 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.**

There are no federal employee costs associated with this collection. All employee costs are contracted through a partnership agreement with the University of Montana. The estimates below include the contracting and operational expenses associated with this collection totaling \$85,009.

<b>Non-Federal Employee Costs</b>			
Position	Hourly Cost	Hours	Total Cost
Principal Investigator (Metcalf)	46.32	165	7,643
Director of Survey Research (Baldrige)	37.87	348	13,179
Research Assistant	14.51	480	6,965
Survey Assistants	17.12	1352	23,146
<b>Operational Expenses</b>			
Supplies, Printing, and Mailing			23,623
Contract Services			2,500
Travel			225
Indirect Cost (University of Montana)			7,728
<b>Total</b>			<b>\$85,009</b>

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

This is a new collection request.

**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 including summary data and analyses may be presented in internal reports after survey completion. The results of the data collection including summary data and analyses may also be presented in peer-reviewed publications. Copies of all reports and publications may also be archived on collaborative project webpages.

The analyses will include response frequencies, means, standard deviations, and confidence intervals used to address concrete management and planning issues. More complex multivariate statistical analyses may also be performed, as when estimating coefficients for models. The table below presents a time schedule for this surveying effort.

	<b>Begins</b>	<b>Ends</b>
Survey Information Collection	Immediately following OMB determination of approval.	6 months after collection begins
Data Analysis	6 months after collection begins	1 year after collection ends
Report Preparation and Publication	1 year after collection ends	2 years after collection ends

**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 on the information collection instruments associated with this submission.

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

There no exceptions to the certification statement.