

# **1Supporting Statement A Yukon-Kuskokwim Delta Berry Outlook**

**OMB Control Number 1028-0122**

**Terms of Clearance:** None

## **Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The collection of information is necessary to better understand the dynamics of the ecology of berry producing plants in the Yukon-Kuskokwim (YK) delta and future impacts to berry resources that may result from changing landscapes, ecology, and weather patterns. Berries are an important subsistence resource for Alaska Native populations and Migratory bird populations in this region. The YK delta is home to some of the largest Alaska Native Villages in the state where families can pick more than 75 liters of wild berries annually. The villages in this region are islands surrounded by the Yukon Delta Wildlife Refuge which boasts the most productive goose nesting habitat in North America. Legal authority for this collection can be found in 16 U.S.C. 3119 Alaska National Interest Lands Conservation Act (ANILCA), which authorizes the Secretary of the Interior to enter into cooperative agreements to fulfill subsistence management and use of public lands in Alaska. Further, the Migratory Bird Conservation Act, 16 U.S.C. 715 i.(b) authorizes the Secretary of the Interior to enter into agreements with public and private agencies to conduct investigations and to administer lands, water or other interests for the purpose of conserving and protecting migratory birds.

**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 will be used by USGS researchers to increase understanding of berry ecology in this region and make recommendations to Yukon Delta Wildlife Refuge staff and Yukon-Kuskokwim Delta village organizations concerning possible futures scenarios for berry productivity and abundance. Information collected previously has been used to create a plain language report of results for Tribal Councils in the villages that participated in the information collection as well as individual community participants. A peer reviewed manuscript of results is currently in process as well.

The survey instrument contains statements concerning three species of berries, locally known as:

salmonberries, blackberries, and blueberries. Statements are identical for each berry species and respondents are asked to choose a response on a likert scale. Possible responses are: Strongly agree, agree, do not agree or disagree, disagree, strongly disagree. Justification for each question follows, the question itself is *italicized*:

Part A)

*(Salmon/Black/Blue)berries are important in my household.* – The response to this statement will be used to ascertain the level of importance of different berry species in households to understand possible impacts were this berry no longer available.

*My family travels a further distance now than in the past to gather (Salmon/Black/Blue)berries.* – The response to this statement will provide information on whether people are traveling the further distances to obtain berries, indicating the potential for changing habitats.

*My family travels a shorter distance now than in the past to gather (Salmon/Black/Blue)berries.* – The response to this statement will provide information on whether people are traveling shorter distances to obtain berries, indicating the potential for changing habitats.

*If winter snowpack is low (not a lot of snow) there will be fewer (Salmon/Black/Blue)berries in the summer.* – The response to this statement will help to establish a consensus on the impact of snow on berry abundance.

*If there is a lot of rain in the summer there will be fewer (Salmon/Black/Blue)berries.* – The response to this statement will help to establish a consensus on the impact of rain on berry abundance

*(Salmon/Black/Blue)berries are smaller than they were ten years ago.* – The response to this statement will document whether the health of berries is changing or staying the same.

*We find more brown, dead (Salmon/Black/Blue)berry plants than we found ten years ago.* – The response to this statement will document whether the health of berries is changing or staying the same.

*Smoke from fires does not impact (Salmon/Black/Blue)berries.* – The response to this statement will help to establish a consensus on the impact of increasing wildfires on berry resources.

*Cold temperatures in the spring do not impact how many (Salmon/Black/Blue)berries there will be.* – The response to this statement will document if changes in spring temperatures impact berry resources.

*Hot temperatures in the summer do impact how many (Salmon/Black/Blue)berries there will be.* – The response to this statement will document if changes in summer temperature impact berry resources.

*There are fewer (Salmon/Black/Blue)berries than there were ten years ago.* – The response to this statement will help to establish a consensus on whether the abundance of berries has changed or stayed the same over the past decade.

*How many (Salmon/Black/Blue)berries there are each year is more variable than ten years ago.* – The response to this statement will help to establish a consensus on whether the abundance of particular berry species are more variable.

*We travel less than twenty miles to pick (Salmon/Black/Blue)berries.* – The response to this statement will document how far people travel to pick berries.

*(Salmon/Black/Blue)berries are impacted by ATV trails.* – The response to this statement will document if particular species are being impacted by ATV travel.

*(Salmon/Black/Blue)berries are ripe earlier in the season than ten years ago.* – The response to this statement will help to establish a consensus on whether observed changes in seasonal timing have impacted the timing of berries ripening.

*High wind events do not impact how many (Salmon/Black/Blue)berries there are.* – The response to this statement will help to establish a consensus on whether wind and potential change in wind patterns have an impact on berry resources.

*The landscape where we pick (Salmon/Black/Blue)berries has changed.* – The response to this statement will document whether landscape changes (erosion, permafrost thaw, flooding, etc) are impacting berry resources.

*(Salmon/Black/Blue)berries are not impacted when there is a flood.* – The response to this statement will document whether flood events impact particular berry species.

*The location where we can pick (Salmon/Black/Blue)berries has changed over the last ten years.* – The response to this statement will document if berries are growing in the same location they always have over the past decade or if people are being forced to seek out new berry picking locations.

Part B)

<b>1. Did you pick (salmon/black/blue)berries this year?</b> <i>(please circle your response)</i>		YES	NO
<b>&lt;if yes move to question 2&gt;</b>			
<b>a. If you answered NO, please tell us why:</b> <i>(check all boxes that apply or write in the reason and then move to questions about the next berry)</i>	No berries available/could not find any.		
	Conflict with other subsistence activities.		
	Conflict with other non-subsistence activities.		
	Could not travel to berry picking location.		
Other:			
<b>2. When did you pick (salmon/black/blue)berries?</b> <i>(please write in the month and approximate day(s))</i>			
<b>a. Was this the same time that you picked salmonberries in previous years?</b> <i>(please circle your response)</i>		YES	NO
<b>&lt;if yes move to question 3&gt;</b>			
<b>b. If you answered NO, was it earlier or later in the season?</b> <i>(please circle your response)</i>		Earlier	Later
<b>c. Please tell us why you picked earlier or later: <i>(please write in your response)</i></b>			

Justification questions 1 & 2:

- Question 1: This question is necessary to establish whether the respondent can complete the rest of the questionnaire as all questions are concerning the present years' berry harvest.
- Question 2: This question seeks to understand if respondents are observing phenological changes in particular berries.

<b>3. How many (salmon/black/blue)berries did you pick?</b> <i>(please write in your response and circle whether your response is in liters, gallons, or pounds)</i>			
	liters	gallons	pounds
<b>a. Is this the same amount you picked in previous years?</b> <i>(please circle your response)</i> <b>&lt;if yes move to question 4&gt;</b>		YES	NO
<b>b. If NO, did you pick more berries or fewer berries?</b> <i>(please circle your response)</i>		MORE	FEWER
<b>c. Please tell us why you picked more or fewer:</b>			
<b>4. How much time did you spend picking (salmon/black/blue)berries?</b> For example, 2 hours, 4 days, 1 week? <i>(please write in your response)</i>			
<b>a. Is this the same amount of time you spent in previous years?</b> <i>(please circle your response)</i> <b>&lt;if yes move to question 5&gt;</b>		YES	NO
<b>b. If your answered NO, did you spend more time or less time?</b> <i>(please circle your response)</i>		MORE	LESS
<b>c. Please tell us why you spent more or less time:</b>			
<b>5. Did you pick (salmon/black/blue)berries at the same location as in previous years?</b> <i>(please circle your response)</i>		YES	NO
<b>a. If you answered NO, please tell us why:</b>			
<b>6. How did you travel to the location you picked (salmon/black/blue)berries?</b> <i>(please write in your response)</i>			

Justification for questions 3 – 6:

- Question 3: This question is necessary to understand if there is a perceived change in abundance of berries.

- Question 4: This question is necessary to understand if berries are becoming harder to find and thus taking more time to harvest.
- Question 5: This question is necessary to understand if berry habitats are changing.
- Question 6: This question is necessary to understand the potential for stress on households or the landscape due to different modes of transportation (financial burden associated with fuel for boats, potential impacts to the landscape from ATV trails).

**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.**

This data collection does not use automated, electronic, or any other technological collection techniques. The Yukon-Kuskokwim Delta Berry Outlook surveys will be delivered via US Postal Service to respondents who will mark their answers on paper and return them to project personnel via the US Postal Service. Internet connectivity in Yukon-Kuskokwim communities is often interrupted and most households do not have access to a computer. While smart phones are prevalent in YK Delta villages service can be intermittent. It is therefore best to use low tech data collection methods to reach the largest sample of potential respondents.

**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.**

Investigators are working closely with other researchers in the field to share resources and avoid duplication. The Alaska Native Tribal Health Consortium has distributed a paper based survey focused on berries at two Alaskan Tribal Environmental conferences (Alaska Tribal Conference on Environmental Management, Alaska Forum on the Environment) and electronically to participants in the Local Environmental Observers (LEO) Network over the years 2013 and 2014. A modified electronic survey has been distributed to LEO participants on an annual basis since.

This collection focuses in on one region of Alaska, the Yukon-Kuskokwim Delta, in order to gain a deeper understanding of specific berry resources in one region. The LEO survey is distributed across the entire state of Alaska and includes numerous berry species. Finally, because the LEO berry survey is only distributed to LEO network participants, typically there are only one or two respondents in each village while our survey will seek to have a representative sample of YK Delta villages.

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

The collection of information 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.**

This information collection is part of a federally funded study. If this information is not collected the objectives of this study will not be met. Furthermore, this information collection supports the objectives of U.S.C. 3119 Alaska National Interest Lands Conservation Act and Migratory Bird Conservation Act, 16 U.S.C. 715 i.(b).

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

- \* **requiring respondents to report information to the agency more often than quarterly;**
- \* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- \* **requiring respondents to submit more than an original and two copies of any document;**
- \* **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- \* **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- \* **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- \* **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- \* **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the above special circumstances apply to this information collection.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA**

**statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

This information request was published in the Federal Register on Tuesday June 12, 2018 and appears on page 27342. A copy has been attached with this form.

**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.**

We consulted with the individuals listed in Table 1 to obtain their views on the information presented in our instrument. As this is a revision of a previous survey instrument, we have listed consultation for the original survey and consultation concerning the revised survey. Modifications to the format and design of the application were suggested during the testing period and these have been incorporated.

Table 1: Collaboration on Design

Chevak Community Member Date of contact: July 21, 2016	Environmental coordinator - Chevak Traditional Council Date of contact: May 24, 2016 & April 18, 2018
Environmental coordinator - Kotlik Tribal Council Date of contact: May 18, 2016	Assistant Environmental Coordinator - Chevak Traditional Council Date of contact: April 18, 2018
Yukon-Kuskokwim Health Corporation Date of contact: January 28, 2016	Assistant Environmental Coordinator - Kotlik Tribal Council Date of contact: April 24, 2018
Alaska Native Tribal Health Consortium Date of contact: May 13, 2016	Tribal Environmental Director Assistant - Native Village of Port Heiden Date of contact: March 13, 2018

**9. Explain any decision to provide any payment or gift to respondents, other than**

**remuneration of contractors or grantees.**

Respondents will not be provided with payment or gifts.

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

Respondents will remain confidential beyond the research team. Assurance will be provided in the form of an informed consent document as well as a Privacy Act statement.

**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.**

Respondents will not be asked questions of a sensitive nature.

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

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

Table 2 was created using information from Bureau of Labor Statistics USDL-118-0944, Employer Cost for Employee Compensation, published June 8, 2018. BLS reported employer cost for employee compensation for Private Industry averaged \$34.17 per hour. Private Industry values were used to create table 2 and include benefits and overtime.

Table 2: Responder Burden

Participant / Activity	Number of Responses	Minutes per response	Burden Hours	Burden Value
Public reads instructions	150	1	3	\$103.00
Public completes survey	150	24	60	\$2,050.00
Subtotal	150	25	63	\$2,153.00

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no non-hour burden costs with this collection.

**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 total annual cost to the Federal Government is \$13,643.00 This includes salary and benefits for two federal employees to process the responses, analyze the data, and create a report for participating communities and partners. We used the Office of Personnel Management Salary Table 2018 General Schedule and Locality Pay Tables (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>) to determine the hourly rate (Table 3). We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-16-1150).

Table 3: Federal Labor Table

Position	Grade /Step	Hourly Rate	Annu Hrs by Fed	Fully Loaded Hr Rate (x 1.6)	Total Labor Value
Project Lead, Research Landscape Ecologist	13/4	\$46.14	80	\$73.82	\$5,906
Project Co-Lead, Social Scientist	11/4	\$35.09	120	\$56.14	\$6,737
		TOTALS	200		\$12,643

Table 4: Other Federal Government Expenses

Community reporting costs	\$1,000
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**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We have made changes to the survey instrument, sample population, and how the survey will be administrated. The survey instrument was revised based on the outcome of the original survey which suggested that allowing for more flexibility in responses would achieve more accurate data. Therefore, the revised survey uses a likert scale as opposed to the trichotomous (yes, no, don't know) responses that were required in the original cultural consensus survey. Additional changes to the survey included making the survey two parts. Part A consists of statements focused on observations and knowledge of environmental and weather conditions that may impact berry ecology and will be administered once. Part B consists of statements about the quantity of berries harvested in the most recent harvest year and harvesting location and will be

administered annually for three years. The sample population has been increased to include a sample of all villages located in the Yukon-Kuskokwim Delta region of Alaska. The method of administration has been changed from oral administration by project personnel to self-administration. This change is related to the increased sample population which makes it more difficult and costly to administer the survey in person. Thus, the number of responses we expect has increased, but the burden hour on each respondent has decreased as it takes less time for one to read and complete the survey than when it is read aloud.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

We anticipate publishing the findings of this information collection in several formats and presenting in several venues. These include, community and stakeholder reports and presentations that will be given in the communities, in the central hub of the region for stakeholders, as well as at Alaska Tribal Conferences. Survey data will be analyzed following traditional survey analysis procedures including calculating summary statistics. Tabulation will take place on the USGS ScienceBase website per Western Alaska Landscape Conservation Cooperative (the funding agency) procedures and guidelines.

Timetable	2018				2019			
	JFM	AMJ	JAS	OND	JFM	AMJ	JAS	OND
Develop revised two-part survey	●	●						
Distribute survey via USPS			●					
Receive completed surveys			●	●				
Synthesis & analysis of survey results				●	●			
Stakeholder review						●		
Community & Stakeholder presentations							●	
Dissemination & reporting								●

**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 are not seeking such approval.

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

We have no exceptions to the topics of the certification statement.