

# 1Supporting Statement A

## Efficacy of Oak Savanna Restoration History Information Request

### OMB Control Number 1028-NEW

**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.**

Management information about restoration management activities for public and private natural areas are not readily available except through interviews with property managers. To assess the impacts of recent land management actions on the condition of groundlayer vegetation, a central focus of this project, we need to interview property/resource managers concerning the recent history of wildfire/prescribed burning, woody plant cutting, and other land management actions. Without such data we will not be able to understand the factors that contribute to the efficacy of oak savanna groundlayer restoration in the Great Lakes region. This work is consistent with EO 2010-12-09 Facilitating Scientific Research.

- 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.**

Managers from sites where we will have collected vegetation data will be contacted for information about management activities. The information will be used by the Principal Investigators (PIs) and Co-PIs and research assistant(s) to generate a history of management database for all the sites and treatments sampled. Most sites will include three or four subsites as indicated by these treatment types: control, burned, thinned, and/or burned and thinned. The data table will include site name and subsite treatment types as identification without any manager's names, titles or contact information, since this latter information is irrelevant to the analysis. The data table of management history will be used to relate to the condition and status of the groundlayer vegetation, as expressed in variables such as species richness, species turnover, composition through ordination and other statistical methods including structural equation modeling. Results of analyses may include site names and treatment types, but no specific manager information will be retained or relevant to the results.

Question 1: Site – the name of the site is selected, needed to relate site management information to vegetation data

Question 2: Type of management – options include, these items tell us about the management.

that has occurred at each sites. We need this information to help us understand how management has influenced the ground layer vegetation.

- Fire - Prescribed (list date it occurred)
- Fire - Wildfire (list date it occurred)
- Thinning - Canopy (list date it occurred)
- Thinning - Shrub (list date it occurred)
- Seed addition (list date it occurred)
- \*Tillage (list date it stopped)
- \*Grazing (list date it stopped)

Question 3: Year, the year that the selected management type occurred. If known. Without this information we cannot calculate time since the last burn and variables such as fire return interval.

Question 4: Month, the month the selected management occurred if known.

Question 5: Day, the day of the month when the selected management occurred, if known.

Question 6: Season – season of the treatment, if known. If the month and day are not known but the manager can tell us the season, then we will be able to examine the seasonality of treatment on groundlayer vegetation condition.

Question 7: Describing anything specific about the management: opportunity for manager to provide additional information.

**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.**

We decided to use an easy to fill out Excel spreadsheet to obtain the information from managers. The spreadsheet includes standardized variable selection tabs that allow for consistent and easy entry of the management data. For example, we provide site names and management treatments lookup tables so the managers do not have to type this information. All they need to enter is the dates of the last fires, cutting treatments and other management activities.

**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.**

As stated above, site specific management data is not available electronically. Often such information is retained in managers memory, paper records and/or site or context specific GIS or digital files that are not available to anyone else. We will be separately using aerial photographs and satellite imagery from 1938-9 and 2016 National Agricultural Imagery Program (NAIP) to characterize long term trends in land use and history for the sites, but this does not provide the specificity needed from recent site history that managers possess. The land use history and trends

analysis does not provide date of most recent fires, thinning activities and other management actions. Thus the manager information requested and the land use history information are complementary, but not duplicative.

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

The only potentially small businesses or entities that will be contacted will include local land trusts and parks departments. They will get the vegetation data concerning their lands for future reference and some understanding about how their management has influenced the condition of the groundlayer vegetation at their site (s). We will provide them with a better understanding of how restoration is working across the Great Lakes region.

**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.**

If we are not able to collect this information from managers (Federal and others), we will only be able to describe the vegetation patterns in the data, but will not be able to understand what, when and how management actions contributed to these patterns. Thus we will not be able to tell land managers the differences in management efforts on the quality of groundlayer vegetation, nor be able to suggest possible best management actions. We will have failed to meet the primary objectives of this research.

**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.**

We will contact managers at least once, and perhaps in a few instances twice for follow up clarification of their responses. We will give respondents ample time of 60 days to respond to the excel questionnaire. Only one copy of the questionnaire file will be retained and copied to secure backed up storage so they are not lost. Responses will be also backed up in email databases/storage as well. All the respondents' data will be aggregated into one master management file for data analysis. Managers for their own work would want to retain management history records, but we are not requesting them to do so beyond what they already have. No pledge of confidentiality nor submission of trade secrets or confidential information is requested from the respondents

- 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.**

**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.**

The 60-day FRN was published 4/25/2018 at 83 FR 18084. USGS received one comment that did not address the information collection so no action was taken.

We consulted with the individuals listed in the table to obtain their views on the information presented in our instrument. Several 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

Southwest Michigan Land Conservancy Conservation and Stewardship Director and others	Design was evaluated by project leaders including Research ecologists at the Lake Michigan Ecological Research Station, and
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8395 East Main Street Galesburg, MI 49053	restoration ecologists at the Department of Plant Sciences, Michigan State University.

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

No payment or gift will be given to respondents, but they will be provided with the results of this research through email as publications are completed. They will also be given the data collected and the locations of the study plots.

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

For contacting the property/resource managers, we will retain their names and contact information, but such information will not be distributed to anyone else, nor will it be retained in the data for analysis or provided in reports or scientific papers. Their names may be provided in acknowledgements, to thank them for providing management information, but without any contact information.

**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 information of a sensitive nature will be gathered by this request.

**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-18-0944, Employer Cost for Employee Compensation – March 2018, published June 8, 2018. BLS reported employee compensation for Private Industry averaged \$36.32 per hour and for state and local government employees averaged \$49.40 per hour. These values include benefits and overtime.

Table 2: Responder Burden

Participant / Activity	Number of Responses	Minutes per Response	Burden Hours	Burden Value
Public contractor reads instructions	12	10	2	\$73
Public contractor completes survey	12	45	9	\$327
SubTotal	12		11	\$400
Local Govt reads instructions	8	10	1	\$49
Local Govt completes survey	8	45	6	\$296
SubTotal	8		7	\$344
State Govt reads instructions	7	10	1	\$49
State Govt completes survey	7	45	5	\$247
SubTotal	7		6	\$296
Total	27		24	\$1041

Variation in time committed to answering the survey will depend on the number of sites that each entity owns where we have sampled the vegetation and complexity and duration of period of management. The numbers of contacts are based on our best estimates given the vegetation sampling that has been conducted so far.

**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 cost burdens for 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 \$5617. This includes salary and benefits for one federal employee to process the responses. We used the Office of Personnel Management Salary Table 2018 Chicago Locality Pay ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/CHI\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/CHI_h.pdf)) to determine the hourly rate (Table 2). We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-18-0944).

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	13/9	\$58.51	60	\$93.62	\$5,617

		TOTALS	60		\$5617
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Table 4: Other Federal Government Expenses  
There are no other Federal government expenses.

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

None

**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 survey results will be tabulated into a large excel spreadsheet that includes site names and treatments, but excludes manager name and contact information. Data collection will occur from the date of approval to August 15, 2019. Most collections should be completed prior to December 31, 2018. End of cooperative agreement with Michigan State University will be August 15, 2019. Data will be statistically analyzed using statistical software (R, Systat etc.) to summarize management history at each site and treatment combination (e.g. time since most recent fire, fire return interval, time since last cutting, and fire frequency). These variables will be summarized in the scientific paper and the raw dataset will be made available to as required by federal law Completion of publication of scientific paper from the project is uncertain, but a good faith effort will be made to have the paper in draft form and submitted to a scientific journal by August 15, 2019

**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.**

Not applicable.

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

There will be no exception to certification requirements.