

Supporting Statement A
Paperwork Reduction Act Submission

**Community Harvest Assessments for
Alaskan National Parks, Preserves, and Monuments**

OMB Control Number 1024-0262

Terms of Clearance: None

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

From the Organic Act of 1916 to enabling legislation for specific parks, the National Park Service (NPS) has a Congressional mandate to collect information that can be used to assist in the management of national parks, preserves, and monuments. The NPS *Management Policies 2006*, Section 8.11.1, states that social science research will be used to provide an understanding of park visitors, the non-visiting public, gateway communities and regions, and human interactions with park resources.

The Alaska National Interest Lands Conservation Act (ANILCA) provides the opportunity for qualified rural residents to harvest fish, wildlife, and other subsistence resources in national parks, preserves and monuments in Alaska. This research is supported by Section 812 of ANILCA which states:

“The Secretary [of the Interior], in cooperation with the State (of Alaska) and other appropriate Federal agencies, shall undertake research on fish and wildlife and subsistence uses on the public lands.”

Under the provisions of ANILCA, subsistence harvests by local rural residents are the priority consumptive use of park resources. This collection will continue to gather information on subsistence harvest patterns and the impact of rural economy from resident zone communities and those affiliated with the following parks, preserves, and monuments:

- Aniakchak National Monument (ANIA)
- Bering Land Bridge National Preserve (BELA),
- Cape Krusenstern National Monument (CAKR),
- Denali National Park & Preserve (DENA)
- Katmai National Preserve (KATM)
- Lake Clark National Park and Preserve (LACL)
- Noatak National Preserve (NOAT),
- Wrangell-St. Elias National Park and Preserve (WRST)

Legal Authorities:

- National Park Service and Related Programs, Research Mandate (54 U.S.C. 100702)
- NPS Organic Act of 1916 (54 U.S.C. 100101)
- Alaska National Interest Lands Conservation Act (ANILCA) of 1980 (16 U.S.C. 410hh-3233)
- Determination of Resident Zones (36 U.S.C. 13.430)

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 from this collection is used by the NPS, the Federal Subsistence Board, the State of Alaska, and local/regional advisory councils in making recommendations and decisions regarding seasons and harvest limits of fish, wildlife, and plants in the region which communities have customarily and traditionally gathered these resources.

In-person interviews are used to collect information about harvests, uses, and sharing of subsistence resources. Search and harvest areas are also mapped. Household demographics and the involvement of individual household members in subsistence activities are also collected.

A core set of identical questions are used during all interviews; however, recognizing that different resources are available in different regions, we are requesting to modify the lists to include harvested resources that vary by region and to use local nomenclature/Alaskan native names for resources. For example, residents in a coastal community maybe asked questions about marine resources (e.g., marine mammals, shellfish, black seaweed), whereas respondents of an interior community are asked questions about mammals such as sheep or bison. In order to avoid missing uses of species not anticipated in the form, respondents are prompted to name any resources they used that were not on the list.

The collection is used to document subsistence activities over one calendar year (January to December) for each household sampled. The head(s) of household are asked to respond for each household.

The categories of questions are as follows:

Individual demographics:

Gender, ethnicity, age, where each family member lived when the respondent was born, length of time in the community, and educational level is used to understand the variability in subsistence harvest patterns between households.

Individual participation:

These questions are used to learn more about which members of the household engaged in subsistence activities, especially younger members.

The following questions have been modified for clarity and usability:

Page	Old Question	Modified Question	Reason for Modification
1	This survey is used to estimate wild food harvest and to describe rural community economies.	This survey is being conducted by the Alaska Department of Fish and Game in collaboration with the National Park Service and the help of local assistants. Responses are used to estimate wild food harvests and describe rural community economies.	During previous iterations of the survey the respondents questioned the purpose of the questionnaire and the use of the information.
5	Did this person build dog sleds?	Did this person build sleds?	Responses were not limited to dog sleds
5	Did this person sew skins/cloth?	Did this person sew skins?	Question was narrowed in scope to focus on the use of harvested skins

The remaining questions collect information at the household level rather than the individual level.

Household uses of park resources:

The questions in this category are used to determine changes in patterns of resource use; whether the household was able to get enough resources, whether subsistence needs are being met and if not, what is the impact on the household. Because of differences in the resources harvested and the importance of subsistence in household economies, not all respondents will answer all questions.

To reduce respondent burden, screening questions are used to determine if a household used or tried to harvest a given category of resources during the sampling period. Respondents are only asked to answer questions about specific resources the household used or tried to harvest in the particular category. Prior to interview administration, the list of specific resources is adjusted to reflect the resources commonly available in each community.

Additional Assessments:

The questions in this category provide an overall assessment of resource health, transportation methods, subsistence equipment, home heating sources, making of traditional handicrafts and food security.

The following questions have been modified for clarity and usability:

Page	Old Question	Modified Question	Reason for Modification
29	What kind of wild resources did you need?	Question removed.	Repetitive question in earlier section of survey.
29	How would you describe the impact to your household of not getting enough wild resources last year?	Question removed.	Repetitive question in earlier section of survey.
29	Were there any resources that your household avoided harvesting due to poor resource health?	Were there any resources that your household avoided harvesting or were concerned about consuming due to disease, contamination, or other resource health issues?	Expanded the question to gain insight on the respondent's awareness of resource health issues in the Parks and surrounding communities.
30	Does your household own, borrow, lease, or charter this equipment?	Does your household own, borrow, rent, or charter this equipment? Or do you ride along with someone else?	Clarified the response to this question because many respondents in previous iterations of the survey commented that they shared rides with family members or friends.

The questions in the "Health Impact Assessment" section (page 29) were not collecting useful information, therefore they have been removed from the survey. That section is replaced with an assessment of subsistence gear purchases made by way of Food Stamps or the Supplemental Nutrition Assistance Program (SNAP).

Page	New Question	Reason for Modification
29	Prior to this survey, were you aware that you could purchase subsistence fishing or hunting gear with SNAP funds?	These questions were added to provide additional data to support the Alaska Department of Fish and Game 2016 survey to determine how communities are using the SNAP program for purchasing subsistence gear. The 2016 survey focused on four communities in the lower Yukon River. This information collection will supplement those findings by adding rural residents in communities surrounding six (6) Alaskan parks.
29	Did your households use SNAP funds to purchase subsistence fishing or hunting gear?	
29	New question: If yes, what types of gear did your household purchase	
29	New question: How important to	

	your household's subsistence hunting and fishing is the availability of SNAP funds for purchasing gear?	
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Modifications to the “Handicrafts” section (page 31) were made to better understand changes in uses of park resources for handicrafts after a 2017 rule change regarding plant materials and discarded animal parts went into effect. In the previous version of the survey, we asked:

“Did members of your household participate in the making of handicrafts using the following materials? If yes, which of the following?”

The question was modified for clarity to include the

- amount,
- unit of measurement and
- location of the materials collected

Household economic characteristics:

The questions in this section ask about the structure of the household economy, including income from both paid employment and other sources. Because many rural Alaskan communities are characterized by a mixed subsistence-wage economy, differences in the proportion of reliance on one type of economy vs. another are critical for understanding the importance of subsistence harvests of park resources.

Reports are provided to the park managers, state and other federal agencies involved in management of subsistence resources, citizen advisory groups, and the surveyed communities. The reports describe levels and patterns of subsistence uses in these parks by the communities. The reports also provide information that will be used to update the Alaska Department of Fish and Game’s Community Subsistence Information System.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

The harvest assessment will be conducted using in-person interviews. We have found that face-to-face interviews are the most effective method for this collection of information. All responses will be recorded by the interviewer using an electronic version of the survey downloaded on an iPad. We will use computer generated maps using iPads or 11 x 17 paper maps at multiple scales to identify resource harvest and search areas. The survey responses will be captured via paper survey.

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.**

There is no known duplication of efforts. There are no federal agencies that collect this information.

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

This information 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.

Failure to collect this information would force the NPS to rely on outdated harvest data that is limited in scope or based on partial or out of date information. Relying on out of date information would compromise the accuracy and reliability of future management strategies and recommendations. The results of this collection will provide information needed to evaluate regulatory recommendations associated with seasons and harvest limits of fish, wildlife, and plants which communities have customarily and traditionally gathered.

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.

No special circumstances exist.

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 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.

A Federal Register notice requesting public comments was published on November 21, 2019 (84 FR 64336). The notice announced that we would submit this information collection request to OMB for approval. In the notice, we solicited public comments for 60 days, ending January 21, 2020. We received one comment via email, on January 21, 2020 from the State of Alaska ANILCA Implementation Program that represented the consolidated views of state resource agencies. No actions were required.

In addition to the Federal Register notice, we solicited feedback from professionals with strong background knowledge of subsistence harvesting practices to determine the continued utility and relevancy of the information. Three individuals representing NPS and three representatives from the Alaska Department of Fish and Game (ADF&G) were asked to provide feedback about the clarity of questions and instructions. Based on the revised survey instrument, the reviewers agreed that the time to complete individual interviews would average the proposed one-hour time frame. The feedback also provided changes and modifications that were incorporated in the response in Question 2 above.

Additionally, we contacted individuals from the U.S. Fish and Wildlife Service, Office of Subsistence Management, and the State of Alaska's ANILCA program by email and asked them to provide comments on the updated versions of the forms and our process to collect information.

Comments from Office of Subsistence Management

Comment #1: *This comprehensive subsistence survey instrument has been standardized by the Alaska Department of Fish and Game over the course of close to 40 years of research. The value of this survey is in ensuring a standard application and structure with few changes over time in order to ensure comparable results. The updates made to this survey do not interfere with those portions of the survey that ensure standard and comparable results. Changes made to this survey only ensure further clarity in asking questions for those administering the survey and the addition of a refusal bias questions that allows for the most basic of information to be collected in the case of a refusal. The burden of time has not been affected by these changes.*

NPS Response: No action taken.

Comment #2: *Food Security – have these questions become standard for ADF&G, DOS? Or is this of interest to NPS?*

NPS Response: These questions have been standard in the ADF&G, Division of Subsistence comprehensive harvest survey form for over a decade.

Comments from U.S. Fish and Wildlife Service

Comment #1: *I didn't realize that Subsistence Division surveys had become so extensive. Some of it seems excessively detailed, such as asking for small mammal/furbearer harvest by month---would that really be useful information?? But I appreciate the need for consistency across surveys and species, and if households have the option of not answering, I don't think it's a problem.*

NPS Response: Timing of harvest is collected by month, as opposed to general seasons such as "fall" or "spring" because seasons are not consistent across regions or by species. No change made.

Comment #2: *I assume that questions change somewhat depending on the community location---in that not everyone gets asked about birch bark, for instance?*

NPS Response: The species that are asked about are tailored to the region/community in which surveys will be administered.

Comment #3: *Overall, I think it looks fine and I don't have any issues with it receiving OMB approval. I have worked in subsistence management for a long time, and the harvest data collected in these household surveys has been invaluable.*

NPS Response: No action taken.

Comments from Alaska ANILCA program

Comment#1: *Paperwork Reduction Act Statement on page 1. I understand this is a likely an OMB requirement to be included in writing on the survey. However, it gives the impression the survey is being administered by the Park rather than the ADF&G (especially if it is read aloud to respondents). Please modify the survey to ensure there is no confusion that the survey is a collaborative effort and the individual conducting the survey may be a representative of the Park, ADF&G, or a volunteer for either entity. I would recommend adding text to the introduction above to express this.*

NPS Response: Revisions made to introduction on page one to clearly indicate that the survey is being conducted by the Alaska Department of Fish and Game in collaboration with the National Park Service and with the help of local assistants.

Comment #2: *Regarding the trapping questions on page 10 - does this include commercial activity? The marine invertebrate filter question specifically says “non-commercial.” I assume that was in the marine invertebrate section to differentiate between commercial crabbing.*

NPS Response: Yes. The assumption is correct. In this context, trapping is not an industrial activity, with employees, such as commercial crabbing.

Comment #3: *Consider listing the Alaska Native names for resources throughout the form; this can be especially helpful for marine invertebrates, fowl, and plant resource questions but can be helpful in general.*

NPS Response: It is standard practice to include Alaska Native language names for resources, as well as commonly used alternative names — these are specific to each region/community. For the purposes of this review we use the common names of resources, however we are requesting permission to modify the forms to use local nomenclature and Alaskan Native names to describe resources.

Comment #4: *With regard to the collections on page 31, to avoid unnecessarily alarming potential respondents who were likely not aware the NPS did not consider subsistence collection an allowed use, since this use may have been occurring prior to the proposed rulemaking, we suggest rewording the introduction to the revised collections question to:*

- *It is legal to collect shed or discarded animal parts (horn, antler, bones... etc) on NPS lands for making and selling of handicrafts for personal use, barter or sale.*
- *It is legal to collect plant materials on NPS lands for making handicrafts for personal use, barter, or sale.*

NPS Response: Language in this section was revised to incorporate this change.

Comment #5: *Moving forward, the collection of the handicraft module data may provide information that communities, on a case-by-case basis, may find useful to support documentation of their subsistence needs.*

NPS Response: No action required. NPS will continue to support ADF&G Division of Subsistence's data collection effort.

Comment #6: *We feel it is critical the NPS fully support the ADF&G Division of Subsistence standard procedures for voluntary and confidential data and to collaborate with the local communities where the survey is being conducted to allow them to determine what questions they desire to have*

included and the wording used in the surveys to first and foremost meet the local community's needs and wishes. Thank you for this opportunity to comment in support of data collection efforts that are valuable to subsistence users.

NPS Response: No action required. NPS will continue to support ADF&G Division of Subsistence's data collection efforts.

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.

Individual responses will be kept anonymous. For reports and databases, the data will be summarized at a community level. Households will be assigned a random number that will serve as the household ID number. Only the identification number will be on the form, and interviewers will be instructed not to place names or other personally identifiable information on the form. Once the data collection is complete, any links between the household name and the household ID number will be destroyed. This assurance is found in Alaska Statute 16.05.815 13(d): "Except as otherwise provided in this section, the department shall keep confidential (any) personal information contained in fish and wildlife harvest and usage data."

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.

The "Other Income" section on page 32 may contain questions that some respondents may consider to be "sensitive in nature." Many households in the rural communities depend upon a mixed economy, one made up of both income from jobs, federal assistance (i.e., Food stamps, SNAP, etc.), and subsistence hunting and fishing. The specific income questions are asked to understand how subsistence hunting and fishing fits into the rural Alaskan economy. Many people use wages from jobs to support hunting, fishing, and gathering activities. For example, household members that work full-time can purchase hunting equipment such as motor boats, snow machines, and 4-wheelers, which they in turn use for hunting and fishing activities. In some rural areas of Alaska SNAP can also purchase subsistence hunting/fishing gear for procurement of wild foods. The purpose of asking the income question supports the results that help to understand the impact of SNAP on food security within a mixed economy.

We note that at any time during the interview, the respondent can refuse to answer or skip any questions they are not comfortable answering. Answering any or all the survey questions is strictly voluntary and completely anonymous.

No other 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 effort will occur over a three-year period. For each period, if the community has less than 100 households, 100% of the households will be included in the sample. In the communities with more than 100 households, we will randomly select a representative number of households in each community to be sampled. The numbers below reflect the total effort during the 3-year period of approval. Based on the most recent census data, there are 2,519 households in the survey area. Our goal is to contact a total of 1,834 households and we expect to complete 1,389 interviews.

Table 12.1 Respondent Universe and expected response rate.

Communities	Respondent Universe (2010 Census)	Anticipated number of contacts	Estimated number of completed interviews
Aniakchak (ANIA)	109	109	98
Bering Land Bridge (BELA)	1,381	771	453
Cape Krusenstern (CAKR) Kobuk Valley (KOVA) and Noatak (NOAT)	311	299	269
Denali (DENA)	6	6	5
Katmai (KATM)	384	321	269
Lake Clark (LACL)	190	190	171
Wrangell-St. Elias (WRST)	138	138	124
TOTAL	2,519	1,834	1,389

Based upon our experience with the 2018-2019 collection we anticipate that the initial contact will be used to explain the purpose of the collection and to set up an interview time; this will take at maximum

10 minutes to complete. All persons contacted (n=1,834) will be asked two questions that will be used to conduct a non-response bias check. We anticipate the respondent burden for persons refusing to participate will average **74 hours** (445 responses x 10 minutes), this includes the initial contact time and the time to answer the non-response questions.

The total burden for the respondents agreeing to participate and complete the interviews will be **1,389 hours**. This includes the time to conduct the initial contact, schedule the interview session and complete the interview process (1,389 respondents x 60 minutes).

We estimate that we will receive a total of 1,834 responses totaling **1,463** annual burden hours. We estimate the dollar value of the burden hours is **\$31,586** (rounded). We used the May 2018 State Occupational Employment and Wage Estimates Alaska to calculate the hourly farming, fishing and forestry occupations (<https://www.bls.gov/oes/current/oes450000.htm>). To calculate the total annual burden for this collection we multiplied the mean hourly wage of \$14.49 by 1.49 (for individual) to include benefits for a fully burdened rate of \$21.59.

Table 12.2 Total Estimated Hour Burden and Dollar Value of this Collection

Individuals and Households					
Activity	Total Number of Responses	Estimated Completion Time per Response	Total Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Burden Hours*
Initial Contact and Non-response bias check					
ANIA	11	10 minutes	2	\$21.59	\$43
BELA	318	10 minutes	53	\$21.59	\$1,144
CAKR, KOVA, NOAT	30	10 minutes	5	\$21.59	\$108
DENA	1	10 minutes	<1	\$21.59	\$0
KATM	52	10 minutes	9	\$21.59	\$194
LACL	19	10 minutes	3	\$21.59	\$65
WRST	14	10 minutes	2	\$21.59	\$43
<i>Subtotal</i>	445		74		\$1,597
Initial Contact and Completing Interview					
ANIA	98	60 minutes	98	\$21.59	\$2,116
BELA	453	60 minutes	453	\$21.59	\$9,780
CAKR, KOVA, NOAT	269	60 minutes	269	\$21.59	\$5,808
DENA	5	60 minutes	5	\$21.59	\$108
KATM	269	60 minutes	269	\$21.59	\$5,808
LACL	171	60 minutes	171	\$21.59	\$3,692
WRST	124	60 minutes	124	\$21.59	\$2,677
<i>Subtotal</i>	1,389		1,389		\$29,989
TOTAL	1,834		1,463		\$31,586

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 shown in items 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]. 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 costs to respondents.

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 estimated annualized cost to the Federal Government for this proposed collection is **\$686,777** annually. This includes Federal employee salaries and benefits (\$71,777). Table 14.1 below shows federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2019-AK (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/AK_h.pdf) to determine the hourly rates for federal employees. We multiplied the hourly rate by 1.6 to account for benefits (as implied by the previously referenced BLS News Release - [USDL-19-2195](#)).

This estimate also includes the operational expenses associated with this collection (\$615,000). These costs are largely for the contractor/cooperator (\$600,000) -- travel, staffing and associated operating costs (supplies, field data collection, statistical analysis and reporting, table 14.2 below).

NPS travel cost of \$15,000 are based on actual costs for visiting the more remote communities to be surveyed.

Table 14.1 Federal Employee Salaries and Benefits

Position (Locality: Alaska)	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time (hours)	Annual Cost
Cultural Resources Program Manager (Aniachak National Monument & Katmai National Preserve)	12/5	\$45.14	\$72.22	120	\$8,666
Cultural Anthropologist (Bering Land Bridge National Preserve)	11/5	\$37.66	\$60.26	240	\$14,462
Cultural Anthropologist (Western Arctic Parklands)	11/5	\$37.66	\$60.26	240	\$14,462
Cultural Anthropologist (Denali NPP)	11/5	\$37.66	\$60.26	40	\$2,410
Cultural Resources Program Manager and Subsistence Coordinator (Lake Clark NPP)	12/5	\$45.14	\$72.22	240	\$17,333
Cultural Anthropologist (Wrangell-St. Elias Park and Preserve)	12/5	\$45.14	\$72.22	120	\$8,666
Cultural Anthropologist (Alaska Regional Office)	12/5	\$45.14	\$72.22	80	\$5,778
Total					\$71,777

Table 14.2 Operational Expenses

NPS staff travel to remote communities	\$15,000
Contractor/cooperator costs for staffing, cooperator travel, supplies, field data collection, statistical analysis and reporting	\$600,000
Total	\$615,000

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

With this renewal the program will add three new communities (DENA, KATM and LACL) to this collection and removing to communities where the sampling is complete (GAAR and YUCA). The addition of this communities will constitute 809 completed responses (non-respondents and additional interviews) leading to a net increase of 342 burden hours.

Table 15.1 Anticipated program Changes

Communities Surveyed	Anticipated Completed Responses			Anticipated Respondent Burden (hours)		
	Current	Previous	Net Change	Current	Previous	Net Change
ANIA	207	207	0	116	116	0
BELA	1224	583	+641	617	328	289
CAKR, KOVA, NOAT	568	823	-255	319	458	-139
DENA	11	0	+11	6	0	+6
KATM	590	0	+590	323	0	+323
LACL	361	0	+361	203	0	+203
WRST	262	325	-63	147	183	-36
GAAR	0	162	-162	0	91	-91
YUCA	0	314	-314	0	177	-177
	0	0	809	0	0	+342

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.

Interviews will be conducted each winter and spring beginning in 2020 and ending in 2023. The time schedule will be essentially the same:

- The interviews will be conducted in January through April, which are generally less busy times of the year for subsistence users and thus months when respondents are more likely to have time to participate.
- Data entry and preliminary data analysis will take place during the summer and fall.
- Meetings will be held in the fall or winter to discuss the preliminary survey results with the subject communities.
- Data analysis and report preparation will continue until November of the following year.
- Following feedback on the draft from the sponsoring agencies, the final report will be submitted and the data entered into the Community Subsistence Information System.

A single report for each park will describe community level results and publish summary tables and figures for the communities surveyed in a single year. A review meeting will be held in each community to discuss the results, clarify any information and identify any missing data before the final report is published. Finally, completed reports will be disseminated to park staff, community libraries, tribal council offices, and other agencies and advisory bodies involved in subsistence management in the region. The reports will also be posted on the websites of the agencies participating in the process.

Data Processing and Analysis of Survey Results

Preliminary analysis of the data will include comparisons of demography, income and harvest levels over time (e.g., with previous harvest surveys) and complete cross-sectional analysis on the influence of

household composition, income, employment, ethnicity, and so forth on harvest and distributional patterns.

The initial analyses will consist of univariate and multivariate analyses designed to provide descriptive explanations of the data (e.g., frequencies distributions, means, cross-tabulations, and confidence limits). Frequency distributions will be used for the responses to each question and each index created from combined questions. These will be reported as percentages in each of the strata. Cross tabulations will be used to investigate differences between different households and communities. Cross tabulations will also be used to investigate differences between some of the independent and dependent variables. Multivariate analyses will be conducted to assess correlations between specific variables and created indices, and to ascertain whether individual variables might be combined to form a scale based on responses. These types of analyses will also be used to determine amounts of variance in dependent variables as explained by independent variables, to form statistical models for explanation.

Cluster analysis, similarity structure analysis or other multidimensional scaling techniques will be used to find similarities across the data sets. One goal of these analyses is to describe the timing, location, and levels of harvesting activities, as well as the characteristics of the sample across communities (e.g., age, sex, ethnicity, household composition, etc.). In addition, regression models may be used to check for outliers, influential data points, and nonlinearity.

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 expiration date for OMB approval on the information collection instruments associated with this collection.

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

There are no exceptions to the certification statement.