**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)
* Gates of the Arctic National Park and Preserve (GAAR)
* Katmai National Preserve (KATM)
* Kobuk Valley National Park (KOVA)
* 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 may be 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 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 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 question in the Food Security section has been modified for clarity and usability:

|  |  |  |  |
| --- | --- | --- | --- |
| **Page**  | **Old Question** | **Modified Question** | **Reason for Modification** |
| 30 |  Adding a new statement | If STATEMENT 2 or STATEMENT 3 was TRUE, continue with food security questions 4-8 on this page. Otherwise, go to next section… | Tapers the questions – it allows the surveyor and respondent to skip questions, if they are not applicable, hence reducing respondent burden. |
| 8 & 11 | Clarifying question | Was salmon or non-salmon fish harvested for dog food? | This is a legal subsistence use of the resource. No additional burden because of the way that the question is administered. |
| 14 | Clarifying question | Was brown bear or black bear harvested for food, fur, or for both? | This is a legal subsistence use of the resource. It recognizes use of bears for food in some regions of Alaska. No additional burden because of the way that the question is administered.  |

**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 February 22, 2023 (88 FR 10934). 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 April 24, 2023.

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. Two individuals representing U.S. Fish and Wildlife Service, one individual representing the Bureau of Land Management, 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.

|  |  |
| --- | --- |
| **Position** | **Affiliation** |
|  1. Northern Region Program Manager - Fairbanks |  Alaska Department of Fish and Game |
|  2. Information Management Research Analyst |  Alaska Department of Fish and Game |
|  3. Subsistence Resource Specialist at Alaska |  Bureau of Land Management |
|  4. Policy Coordinator |  U.S. Fish and Wildlife Service Office of Subsistence Management |
|  5. Outreach Specialist |  U.S. Fish and Wildlife Service |

**1. Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.**

**Comment #1:** The collection of this information is necessary to quantify and contextualize the harvest and use of wild resources in a given study community. State and federal agencies as well as communities themselves can utilize this information in a variety of ways including land planning, resource conservation, engaging the regulatory process with relevant data, and identifying future research needs.

**Comment #2:** The detail of the survey has a wide range of applications. Other survey tools developed with less detail have provided less insight over time and stymied efforts to quantitatively describe changes over time. Questions regarding wood quantity are unlikely to provide meaningful or comparable responses. However, understanding about wood uses is useful. Overall, the complexity of the survey and the detail of questions address numerous potential questions for harvest and use patterns. Including additional detail regarding month, and whether resources were used for dog food not only provide a more complete picture of use patterns but also serve as prompts to more precisely ask questions such salmon fed to dogs, for example, are included in the harvest. Further, questions regarding less, same, and more use, as well as getting enough help to contextualize results and any possible differences from other data sources or previous years. Demographic information is a key to establishing whether or not a sample is reasonably consistent with other efforts, such as the US Census.

**Comment #3:** The collection of this information is necessary and has practical utility for fish and wildlife management for both state and federal managers, particularly in maintaining the subsistence priority. Harvest and use information is also very helpful in making responsible land management decisions to mitigate impacts to key subsistence species and important areas of subsistence harvest. This information is especially vital when considering development or permanent infrastructure projects. In my current work, information gathered from this survey form has helped to inform ANILCA 810 analyses as a part of the NEPA process.

**Comment #4:** The Comprehensive Wild Food Harvest Survey is an important tool for resource management in Alaska. Uniquely applied to assess subsistence practices, this survey was designed to track harvest and use of wild foods over the course of one year. The survey has been improved since first applied in the early 1980s, but the structure has remained consistent so that the results are comparable over time.

This survey is one of a kind and is instrumental in consistently assessing use of wild foods in Alaska. I have worked in subsistence management for over 20 years and the comprehensive subsistence survey is the gold standard on estimating the harvest and use of fish, game, and other resources, to ensure land managers can make informed decisions on fish and wildlife regulations. In my office (USFWS Office of Subsistence Management) we use the comprehensive subsistence survey data in our analyses of fish and wildlife regulatory proposals. In many regions, the surveys are our best and only chance of understanding and estimating use of wild foods.

**Comment #5:** Subsistence harvest data such as the type gathered from a comprehensive survey like this is the best data we have to understand subsistence use of resources in Alaska. Even in cases where communities have been surveyed previously, re-surveying is valuable to understand trends and variances. So, in essence, yes - the collection of this information is necessary and data will be useful.

***NPS Response/Action Taken:***  No needed action taken.

**2. “The accuracy of our estimate of the burden for this collection of information”**

**Comment #1:**  I believe 1 hour, as general maximum is a realistic estimate for survey length.

**Comment #2:** The accuracy of estimated burden (appx 1hr), is sound and can generally be verified.

**Comment #3:** The estimated burden of 1 hour appears to be accurate, however there could be infrequent cases in which a particularly high harvesting household could take longer for data collection.

**Comment #4:** The survey is long and may require significant time investment (one hour or more) when interviewing active harvesters and hunters, however the results are incredibly beneficial to the proper and informed management of public resources. One hour or less is an accurate assessment of the average time to complete a full survey. For those households that do little in the way of harvesting, processing, and using subsistence foods, it might take less than 30 minutes. It might take longer if the interviewee wishes to provide contextual information.

**Comment #5:** Given that most households won't need to complete every question on every page, I think the estimate is accurate. There may be a few extremely high harvesting households that exceed 1 hour, but those would be outliers and not the norm.

***NPS Response/Action Taken:*** No needed action taken.

**3. “Ways to enhance the quality, utility, and clarity of the information to be collected”**

**Comment #1:** On some of the pages such as food security and employment we have text that explains why we are asking these questions. I’ve always felt that for the pages NPS includes such as the additional assessment pages, similar text could enhance the quality of the data we gather and the clarity for respondents.

**Comment #2:** Enhancement of quality from this tool and the questions asked will involve carefully choosing and sorting resources asked about such that they are relevant for communities and the most important species are addressed first. Alternative collection tools for this data, focusing on streamlining interpretation and responses, have been tested and while producing quality results, lack the rigor of a form like this.

**Comment #3:** The information collected appears to be very comprehensive (lending itself to a number of uses as mentioned) and the questions are clear and understandable. I have no suggestions for improvement.

**Comment #4:** The survey is complicated to administer but easy for the respondents to take if they consent to participate. The questions are simple, relevant to subsistence users in Alaska, and easy to understand.

**Comment #5:** There is an existing library and report publication system for these harvest surveys, which will help to make the information collected useful and available.

***NPS Response/Action Taken:***  No needed action taken.

 **4. “Ways to minimize the burden of the collection of information on respondents”**

**Comment #1:** Any opportunity to add filter questions should reduce the burden for the majority of households. Incorporating this into food security was a solid enhancement. Most or all other question categories already have appropriate filter questions.

**NPS Response** Given the filter questions throughout the form, this instrument has design features to limit the burden for respondents by eliminating irrelevant questions.

**Comment #3:** These surveys are comprehensive for a reason and can require a significant time commitment from those who participate. But the designers of the survey are thoughtful about providing filter questions at the start of each section. Few households will require the amount of time it takes to address all survey questions.

**Comment #4:** Because this survey is voluntary and anonymous, the burden of collection seems reasonable to me.

***NPS Response/Action Taken:***  No needed action taken.

**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 35 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 who work full-time can purchase hunting equipment such as motorboats, 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.”**

We estimate that there will be approximately **2,359** total responses totaling **1,972** annual burden hours. We estimate the total dollar value of the annual burden hours for this collection to be $***70,620*** (rounded). We used the rates listed by Bureau of Labor Statistics (BLS) Occupational Employment and Wage Statistics[[1]](#footnote-2) (May 2022 State Occupational Employment and Wage Estimates for Alaska to calculate the hourly farming, fishing, and forestry occupations). We used the BLS news release[[2]](#footnote-3) (USDL-23-1305; June 16, 2023, Employer Costs for Employee Compensation—March 2023), to calculate the benefits for respondents in this collection.

To calculate the total annual burden for this collection we multiplied the mean hourly wage of $22.52 by 1.59 for a fully burdened rate of $35.81.

**Table 12.1 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  BELA  CAKR, KOVA, NOAT  GAAR KATM LACL WRST | 143163875611203 | 10 minutes10 minutes10 minutes10 minutes10 minutes10 minutes10 minutes | 2511159 234 | $35.81$35.81$35.81$35.81$35.81$35.81$35.81 | $72$179$394$537$322$72$1,218 |
| ***Subtotal*** | ***465*** |  | ***78*** |  | ***$2,794*** |
| Completing Interview ANIA  BELA  CAKR, KOVA, NOAT  GAAR KATM LACL WRST | 56122254 35025544813 | 60 minutes60 minutes60 minutes60 minutes60 minutes60 minutes60 minutes | 5612225435025544813 |  $35.81$35.81$35.81$35.81$35.81$35.81$35.81 | $2,005$4,369$9,096$12,534$9,132$1,576$29,114 |
| ***Subtota****l* | ***1,894*** |  | ***1,894*** |  | **$*67,826*** |
| **TOTAL** | **2,359** |  | **1,972** |  | **$70,620** |

\* Rounded to match ROCIS

**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 **$879,688** annually. This includes Federal employee salaries and benefits (**$64,688**) and operational expenses (**$815,000**). 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 2023-AK[[3]](#footnote-4) 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).

This estimate also includes the operational expenses associated with this collection ($815,000). These costs are largely for the contractor/cooperator ($800,000) -- travel, staffing, and associated operating costs (supplies, field data collection, statistical analysis, and reporting, table 14.2 below). NPS travel costs 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** |
| Student Anthropology Trainee (Aniakchak National Monument & Katmai National Preserve) | 9/5 | $34.96 | $55.50 | 100 | $5,550 |
| Cultural Anthropologist (Bering Land Bridge National Preserve) | 11/5 | $42.30 | $67.68 | 180 | $12,182 |
| Cultural Anthropologist (Western Arctic Parklands) | 11/5 | $42.30 | $67.68 | 100 | $6,768 |
| Subsistence Coordinator (Gates of the Arctic National Park and Preserve) | 115 | $42.30 | $67.68 | 120 | $8,122 |
| Cultural Resources Program Manager and Subsistence Coordinator (Lake Clark NPP) | 12/5 | $50.70 | $81.12 | 100 | $8,112 |
| Cultural Anthropologist/Subsistence Coordinator (Wrangell-St. Elias Park and Preserve) | 12/5 | $50.70 | $81.12 | 160 | $12,979 |
| Cultural Anthropologist (Wrangell-St. Elias Park and Preserve) | 7/5 | $28.58 | $45.73 | 240 | $10,975 |
| **Total** | $64,688 |
| **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 | $800,000 |
| **Total** | $815,000 |

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

We are estimating 2,359 responses totaling 1,972 annual burden hours. There is an overall net increase of 525 responses and 509 burden hours from our previous submission. This increase is caused by an increase in the number of respondents at Wrangell-St. Elias (WRST) National Park and Preserve (n=659) Gates of the Artic (GAAR) National Park and Preserve (n=273) and Katmai (KATM) National Park and Preserve (n= 255). This includes a collective net decrease of 662 responses at Bering Land Bridge (BELA), Yukon-Charley Rivers National Preserve (YUCH), Cape Krusenstern (CAKR) Kobuk Valley (KOVA) Noatak (NOAT) and Aniakchak (ANIA).

**Table 15.1 Anticipated Program Changes**

|  |  |  |
| --- | --- | --- |
|  | **Anticipated Completed****Responses** | **Anticipated Respondent Burden (hours)** |
| **Communities Surveyed** | **Current** | **Previous** | **Net Change** | **Current** | **Previous** | **Net Change** |
| Non-response Survey | 465 | 445 | 20 | 78 | 74 | 4 |
| Completed Interviews/Surveys | 1894 | 1,389 | 505 | 1,894 | 1,389 | 505 |
| Total | 2,359 | 1,834 | 525 | 1,972 | 1,463 | 509 |

1. **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 2024 and ending in 2027. 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., frequency 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.

1. **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.

1. **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.

1. <https://www.bls.gov/oes/current/oes450000.htm> [↑](#footnote-ref-2)
2. https://www.bls.gov/news.release/pdf/ecec.pdf [↑](#footnote-ref-3)
3. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/AK\_h.pdf [↑](#footnote-ref-4)