

Supporting Statement A for OMB 0596-0243

Generic Information Collection for Surveys, Interviews, and Focus Groups on Non-Timber Forest Products

Note: This is a request for renewal of the Forest Service Generic Information Collection for Surveys, Interviews, and Focus Groups on Non-Timber Forest Products (OMB # 0596-0243). Although this generic information collection was not used since the last renewal, there were extenuating circumstances, the most significant of them being complications due to COVID. A recent survey of the field indicates several likely uses of it in the next 2 years. We have added a small amount of material, particularly related to Tribal and Indigenous considerations, such as relevant policy and other guidance, as well as additional questions to the compendium.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The purpose of this generic information collection is to collect information that will help the USDA Forest Service sustainably manage and provide guidance to others about managing non-timber forest products (NTFP). Non-timber forest products are plants, mushrooms, and plant- or tree-derived goods like nuts, boughs, sap, and leaves that are harvested for use as food, medicine, cultural, artisan, and other purposes. Foraging refers to the broad practice of searching for, encountering, identifying, and collecting plants, fungi, and lichens from the environment. It should be noted that terms such as foraging, gathering, harvesting, and picking may be used interchangeably, as they refer to similar activities. However, different terminology may also be used depending on the individual or community.

Previous research suggests that approximately 20 percent of the U.S. population collects non-timber forest products for social, cultural, and/or economic reasons. Some gathering is planned and systematic, while much of it is informal, unplanned, opportunistic, or incidental to other outdoor recreation activities. Moreover, some foraged NTFP may be intentionally cared for or managed by foragers. For some people, harvested wild plants and mushrooms make up a substantial or nutritionally important part of their diet. In other cases, non-timber forest products are locally or regionally important products for businesses.

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The Forest Service needs an accurate understanding of the role of foraging of non-timber forest products from National Forests and other lands. The Forest Service and other public and private land managers need general and place-specific information about non-timber forest products and non-timber forest product harvesting practices. This information is not currently available and is critical to supporting our mission of both managing national forests and collaborating with others to develop useful guidelines for management of the forests of the nation. This effort requires a sound scientific basis and the engagement of agency social science researchers. The Forest Service seeks to obtain OMB approval to collect information from people who harvest non-timber forest products and from people who manage, make policies for, or otherwise have a stake in the management of lands where non-timber forest products are harvested or may be harvested.

This information collection will support the delivery of high-quality customer service. Many opportunities exist to manage forests and other natural areas to enhance the supply of non-timber forest products. This increases the benefits they provide to society, individuals, and cultures and helps maintain populations of important non-timber forest products in the face of changes like invasive species and climate impacts. Potential public benefits include improved public health outcomes from outdoor activity and access to socially, culturally, and economically significant products. Harvesting and consuming non-timber forest products also may help supplement food sources for people with limited access to fresh, affordable food. Managing forests and other natural areas to provide non-timber forest products in a sustainable way requires detailed, science-based information that is not widely available. Thus, systematically analyzing the expertise and knowledge foragers possess about non-timber forest products can make valuable contributions to forest management.

Non-timber forest products are important to many Tribes for traditional cultural uses related to health, economic and food security, and native customs and practices. Much of the historical and ethnographic information about the uses of non-timber forest products by American Indians and Alaskan Natives may not reflect contemporary uses and issues. A recent assessment of Indian Forests and management in the United States found that many Tribes are prioritizing stewardship and traditional uses of their forests over timber production, including a strong focus on non-timber forest products. Gaining new information can help us understand how uses of non-timber forest products have changed over time in response to management, socio-cultural circumstances, the economic conditions of Tribes, and environmental forces of change.

Ensuring access to non-timber forest products is also integral to the Forest Service fulfilling its trust responsibility to federally recognized Tribes. Recent federal guidance emphasizes that Indigenous Traditional Ecological Knowledge should inform federal decision-making alongside other scientific inquiry. Furthermore, Joint Secretarial Order 3403 guides the Forest Service to consider Tribal expertise and Indigenous knowledge in federal land management decisions, especially concerning

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resources subject to reserved Tribal treaty rights and subsistence uses, which includes non-timber forest products. The growth of co-stewardship agreements further exemplifies this trend and can be supported by robust collaborative research with Indigenous peoples, on priorities, values, and stewardship practices for NTFP.

Surveys, interviews, and focus groups administered under this generic information collection will collect information from individuals and groups who forage for non-timber forest products and from natural resource professionals who manage land where non-timber forest products foraging takes place. This collection contains a compendium of questions that this research team may select from to develop data collection instruments to answer questions. The methods selected and questions posed will be carefully determined based on individual, group, and site factors, as explained in this document. Specific studies may propose a small number of additional questions needed for a particular NTFP inquiry, and subject to OIRA review.

The data collection efforts initiated under this clearance will be similar in terms of populations (foragers or land managers), the types of questions (from the compendium), and the research methods. Forest Service Research and Development will conduct the necessary quality control to assure each individual information collection conforms with the guidelines of the generic collection and will submit each individual information collection request to OMB for expedited review. Each collection will clearly fit within the overall plan and scope and be well defined in terms of its sample or respondent pool and research methods. Standardization of methods and content across the country is important to providing reliable and consistent information to land managers and foragers over time.

Many laws and policies direct the Forest Service to consider and manage for non-timber forest products for the benefit of the public and to meet trust responsibilities to American Indians and Alaskan Natives on federal and Tribal lands. The Multiple-Use Sustained-Yield Act of 1960 requires the Forest Service to manage national forests “under principles of multiple use and to produce a sustained yield of products and services.” The Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974 requires the Secretary of Agriculture to conduct a Renewable Resource Assessment every ten years, including but not limited to, “an analysis of present and anticipated uses, demand for, and supply of the renewable resources” with consideration for “an evaluation of opportunities for improving their yield of tangible and intangible goods and services” (SEC. 3. [16 U.S.C. 1601]). The 2012 Planning Rule specifically requires “consideration of habitat conditions for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, *gathering*, observing, and *subsistence*” on national forests (*italics added*). The United States is a signatory to the Montreal Process and is required to report every 5 years on a range of criteria and indicators for sustainable use of temperate and boreal forests. Several of the indicators address non-timber forest products, including one on subsistence uses of U.S. forests, but the only systematic data currently available on subsistence practices in the United States are for Alaska.

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1. The Multiple-Use Sustained-Yield Act of 1960 requires the Forest Service to manage National Forests “under principles of multiple use and to produce a sustained yield of products and services.”
2. The Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974 requires the Secretary of Agriculture to conduct a Renewable Resource Assessment every ten years, including but not limited to, “an analysis of present and anticipated uses, demand for, and supply of the renewable resources” with consideration for “an evaluation of opportunities for improving their yield of tangible and intangible goods and services” (SEC. 3. [16 U.S.C. 1601]).
3. Forest and Rangeland Renewable Resources Research Act of 1978 authorizes the Forest Service “to conduct, support, and cooperate in investigations, experiments, tests, and other activities the Secretary deems necessary to obtain, analyze, develop, demonstrate, and disseminate scientific information about protecting, managing, and utilizing forest and rangeland renewable resources in rural, suburban, and urban areas.” Moreover, “Renewable resource management research shall include, as appropriate, research activities related to managing, reproducing, planting, and growing vegetation on forests and rangelands for timber, *forage* (italics added), water, fish and wildlife,” and other functions and purposes (SEC. 3. [16 U.S.C. 1642]).
4. Section 219.10 of the 2012 USDA Forest Service Planning Rule specifically requires “consideration of habitat conditions for wildlife, fish, and plants commonly enjoyed and used by the public for hunting, fishing, trapping, *gathering, observing, and subsistence*” on national forests (italics added). The 2012 Planning Rule also “emphasizes providing meaningful opportunities for public participation early and throughout the [National Forest management] planning process.”
5. The United States is a signatory to the Montreal Process, an agreement among 12 nations to work towards sustainable use and management of temperate and boreal forests. The Montreal Process requires each nation to report every 5 years on criteria and indicators for sustainable use of forests, including subsistence use of forest products.
6. Cooperative Forestry Assistance Act of 1978 [Section (9)(a), Findings] states that “The Congress finds that— (1) the health of forests in urban areas and communities, including cities, their suburbs, and towns, in the United States is on the decline; (2) forest lands, shade trees, and open spaces in urban areas and communities improve the quality of life for residents; ... and (7) strengthened research, education, technical assistance, and public information and participation in tree planting and maintenance programs for trees and complementary ground covers for urban and community forests are needed to provide for the protection and expansion of tree cover and open space in urban areas and communities.” Several sections of the Community Forestry Assistance

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Act specifically authorize the Forest Service to conduct research and give advice on the management of urban forests that are outside of the National Forest System.

7. National Environmental Policy Act of 1969 (PL 91-190), Section 102(2)(A) directs federal agencies to "utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences...in decision making which may have an impact on man's environment."
8. Food, Conservation, and Energy Act (2008, Public Law 110-234) Cultural and Heritage Cooperation Authority, SEC. 8105. Forest Products for Traditional and Cultural Purposes: "(a) In General- Notwithstanding section 14 of the National Forest Management Act of 1976 (16 U.S.C. 472a), the Secretary may provide free of charge to Indian Tribes any trees, portions of trees, or forest products from National Forest System land for traditional and cultural purposes."
9. American Indian Agricultural Resources Management Act (1993), Sec. 105 (a) (4) has implications on Tribal uses of non-timber forest and related agricultural products and U.S. government Trust responsibilities. "Agricultural product" includes crops, livestock, forage and feed, grains, and any other marketable or traditionally used materials, which would be applicable to some non-timber forest products.
10. National Indian Forest Resources Management Act (1990), Sec. 303 addresses "forest product marketing assistance, including evaluation of marketing and development opportunities related to Indian forest products and consultation and advice to Tribes, Tribal and Indian enterprises on maximization of return on forest products" where 'forest product' means "... (C) bark, (D) Christmas trees, stags, branches, firewood, berries, mosses, pinyon nuts, roots, acorns, syrups, wild rice, and herbs, (E) other marketable material."
11. American Indian Religious Freedom Act (1978) directs the President to instruct Departments and agencies to "evaluate their policies and procedures in consultation with native traditional religious leaders in order to determine appropriate changes necessary to protect and preserve Native American religious cultural rights and practices." This includes access to and the use of non-timber forest products for traditional and cultural ritual, ceremonial or other related religious purposes.
12. Alaska National Interest Lands Conservation Act of 1980 (ANILCA) specifies that subsistence is open to "rural residents of Alaska, including both Natives and non-Natives" where subsistence is defined as: "the customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade." (Section 803). Section 811(a) directs the Secretary of the Interior to ensure that: "Rural

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residents engaged in subsistence uses will have reasonable access to subsistence resources on the public lands. Federal and State agencies will undertake research on fish, wildlife, and subsistence use on public lands.”

13. EO 13007: Indian Sacred Sites (May 24, 1996): ‘Sacred site’ means “any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian Tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion.” Many Tribes harvest non-timber forest products at sacred sites for specific religious or related spiritual practices for cultural purposes.
14. Tribal Forest Protection Act of 2004 has provided opportunities for Tribes to treat National Forest lands bordering Tribal lands to ensure access to NTFPs through forest restoration. Obtaining data on access to non-timber forest products could promote fulfillment of that law by identifying other critical restoration needs.
15. Indian Trust Asset Reform Act (ITARA; 2016): The act’s purpose is to help Tribes manage their trust assets [this includes NTFP], which are held by the federal government for the benefit of Native American Tribes and individuals. The act includes a demonstration project that allows Tribes to participate in forest land management and surface leasing activities on trust lands.
16. EO 14072: Strengthening the Nation’s Forests, Communities, and Local Economies: This EO directs federal agencies to pursue a science-based, sustainable forest and land management to honor Tribal treaty rights and integrate Indigenous knowledges into sustainable forest and land management.
17. Joint Secretarial Order 3403 on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters: Is a policy that outlines United States Department of Agriculture’s (USDA) commitment to ensure management of federal lands, waters, wildlife, and habitats under its jurisdiction in a manner that protects the treaty, religious, subsistence, and cultural interests of Tribes. Section 3.f. of the order recognizes the importance of incorporating Tribal expertise and Indigenous knowledge into federal decision-making, especially concerning the management of resources subject to reserved Tribal treaty rights and subsistence uses.
18. Presidential Memorandum on Indigenous Traditional Ecological Knowledge and Federal Decision Making (November 15, 2021): The memorandum emphasizes the importance of incorporating ITEK into federal research, policy development, and decision-making processes. It highlights the administration’s commitment to scientific integrity and evidence-based policymaking, while ensuring that Tribal officials are regularly consulted in matters affecting their communities. This initiative aims to integrate ITEK to enhance scientific, technical, social, and economic advancements of the United States.

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

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

There are two sets of respondents for this information collection: foragers and people who make decisions for lands where foraging may occur (e.g., public land managers). We have identified a broad set of questions to collect information on actual non-timber forest products gathering practices across urban to rural areas on both public and private lands. For example, the questions pertain to:

- People – Who harvests NTFP? Why?
- Places – Where are people harvesting NTFP? What factors affect where people harvest? Who owns the land(s) where harvests are occurring?
- Species – What species are harvested?
- Practices- How do people harvest NTFP? How does harvesting affect the sustainability of NTFP? How are harvested materials processed, distributed, and consumed?

Data collection under this generic information collection will also include information on managing public lands where non-timber forest products gathering may take place. Questions for land managers or decisionmakers include, for example:

- Have you *observed* people foraging where you work? What species were they collecting?
- Have you *spoken with* people foraging where you work? If so, what was the nature of these encounters? Did you talk about their motivations for foraging?
- Are there policies or regulations that pertain to foraging where you work?
- Can you imagine any benefits from encouraging people to forage for plant products and mushrooms where you work?

Finally, data collections under this generic information collection will seek to obtain data on attitudes, values, behaviors, beliefs, customs, cultural significance, presumed health benefits, generational participation, seasonality of gathering, supply chain, marketing, and other aspects of non-timber forest products gathering. Established scales and questions that assess environmental attitudes, behaviors and perceptions may therefore be included in a given data collection process. The information gathered by these questions provides a broader context to understand foraging behavior. In turn, this deeper understanding will help improve outreach to different groups and individuals and help frame policy and communication practices to better meet Forest Service goals.

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- b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Information about the topics listed in 2.a. will be collected from people who harvest non-timber forest products and land managers to understand their experiences and concerns related to non-timber forest product harvesting. We may also collect data from landowners and managers. These may include federal, state, and local public land managers, American Indian Tribes, non-profit organizations who hold and manage land, and private landowners.

- c. What will this information be used for - provide ALL uses?**

The Forest Service will collect, analyze, and interpret data gathered through this collection to develop a scientific foundation for information provided to:

- Land managers seeking to comply with legal mandates, develop new policies, and/or design sustainable management practices related to non-timber forest products;
- Landscape designers interested in creating landscapes that support non-timber forest products gathering;
- Public health officials interested in the contributions of nature and greenspaces to addressing growing national health costs from diabetes, obesity, and stress-related illnesses;
- Green infrastructure engineers seeking to create multi-functional landscapes that can process stormwater, cool cities, and or provide services or goods for people;
- Federal officials who need to make periodic reports to satisfy international treaty requirements;
- American Indians and Alaskan Natives in support of preserving and perpetuating traditional ecological knowledge and cultural practices associated with uses of non-timber forest products;
- Scientists interested in furthering scholarly work on non-timber forest products; and
- Generation of outreach information for gatherers that relate to potential risks associated with harvesting (e.g., misidentification of fungal species).

Findings from this research will be published in the professional and academic literature to reach a wide audience of stakeholders and interested parties. However, data involving Indigenous communities will be handled with additional care and respect. We will seek permission and collaborate with Tribes to determine the appropriate use and sharing of their data.

Data and findings may also be presented to professionals, land managers, non-profit groups interested in foraging, and audiences, as well as at academic conferences. However, presentations and publications will be sensitive to and in

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compliance with agreements made with Indigenous communities regarding data sharing and Indigenous knowledges.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

The information will be collected using a variety of methods, including but not limited to:

- Paper, telephone, and electronic surveys;
- In-person or virtual interviews (with individuals or groups);
- Focus groups;
- Participant observation;
- Other appropriate social science methods.

Specific data collection methods will be selected with a target audience in mind. For example, land managers may be reached successfully by a telephone or in-person interview, occasional foragers may be asked to complete an online survey, and foragers from a new immigrant population may need to be interviewed in person with others from their ethnic group. Whenever possible, multiple methods will be used to ease participation for potential respondents. Electronic means of data collection will be used if they are easier for the respondents. However, some respondent populations may require a paper version (e.g., technology familiarity, lack of internet, etc.).

e. How frequently will the information be collected?

For each individual information collection, the intent is to collect information on a one-time basis with each participant or group in a given location or community of interest. Under this generic collection, multiple individual projects may run simultaneously in different locations.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

In most cases the data collected under this collection will be publicly available with the exception noted below. The audiences for non-timber forest products information are natural resource managers, public open space planners and designers, Tribes, policy makers, other decision makers, other environmental professionals, as well as the people who harvest non-timber forest products themselves.

With respect to American Indian and Alaska Native peoples, we will comply with Chapter 32A Cultural and Heritage Cooperation Authority, Prohibition on

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Disclosure, and any other applicable directives The release of information on American Indians and Alaskan Native's uses of non-timber forest products is addressed in Title 25, Chapter 32A Cultural and Heritage Cooperation Authority, § 3056. Limited information on non-timber forest products use by Tribes will be shared with others and only if desired by the Tribes.

g. If this is an ongoing collection, how have the collection requirements changed over time?

Collection requirements have not changed over time. Based on usage patterns for this information collection, we are requesting fewer burden hours. The 2020 renewal submission requested fewer burden hours based on usage patterns. While no uses of this generic collection were reported since the 2022 approval, some previously planned uses had to be delayed or abandoned due to COVID complications. There are several projects currently being developed (or renewed) that intend to use this generic collection. Thus, we are requesting the same number of burden hours as were in the 2020 renewal request.

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.

When surveys are used, they will be made available online and by request in hard copy. Publicly accessible information gathered from online chat forums and social media sites may be collected without any burden to the participants as one means of reducing burden. In some circumstances, surveys may be administered in person, with the research assistant noting respondent answers on the form. When a respondent has language, physical disability, or related issues this can ease the burden and allow them to more readily provide information.

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.

A limited amount of research related to non-timber forest product harvesting has been conducted by researchers within and outside the U.S. Government. The Information Collections proposed here will include non-timber forest product harvesting by diverse communities in a broad sample of cities and rural areas across the United States and provide more detailed information about who is gathering what, how, and where.

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Other previous research has analyzed Forest Inventory and Analysis (FIA) data collected by the Forest Service to identify the geographic distribution of trees that produce desirable non-timber forest products. This work has also looked at the ecological impacts of gathering and harvesting on non-timber forest product producing tree species and analyzed the economic implications of growing non-timber forest product tree species on private property. But this work has not studied non-timber forest products gathering practices from the non-landowner gatherer, landscape designer, or public land manager point of view. In addition, non-timber forest products are available from many plant species, not just trees.

The Forest Service's National Woodland Owner Survey (OMB Control No: 0596-0078) asks private forest landowners whether gathering has occurred in the past or is anticipated to occur in the future. The survey is limited and does not ask detailed questions about non-timber forest products gathering practices and the responses pertain only to privately-owned forests. It also does not ask who does this harvesting or why.

Other studies on non-timber forest products have focused on individual species like ramps or morel mushrooms that are desirable for gathering. None of this research examines general gathering practices by individuals or cultural groups.

We also thoroughly searched the OIRA database for similar Information Collections that have been submitted for OMB review by federal agencies. We searched Forest Service, National Park Service, Bureau of Land Management, Fish & Wildlife Service, and Environmental Protection Agency surveys because these agencies have natural resource management or environment-focused missions. We used the search terms such as "nontimber forest products," "forage," "non-timber forest products," "NTFP," "wild plants," "wild fruit," and "wild food."

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

The proposed information collection does not specifically target small businesses. Small not-for-profit community, educational, or cultural organizations may be contacted to raise awareness about the project and to request assistance in recruiting participants in the communities they serve. Participation will be voluntary, and individuals will be told that they are free to limit time given to researchers or discontinue participation at any time.

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.

The mission of the Forest Service is to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future

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generations. Legislation directs the agency to provide non-timber forest products for personal and traditional-cultural use on a sustainable basis. The agency is also respected and well-known source of information, and questions about foraging practices have increased. Without this information, the Forest Service and other land management agencies will not have a sufficient scientific basis for managing non-timber forest product resources and the lands that support them and will not have the necessary information to provide technical advice on this issue to other land management agencies and individuals.

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 secret, 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.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6. Although there is no requirement because participation is voluntary, due to the nature of surveys, respondents will typically respond in fewer than 30 days of receipt of the request to participate.

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- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The 60-day notice soliciting comments was published in the Federal Register on December 30, 2024, 89 FR 106422, Page 106422.

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Shorter URL: [Federal Register :: Information Collection; Non-Timber Forest Products](#)

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The following individuals outside the Forest Service have reviewed this non-timber forest products information collection. Reviewers were in support this collection; none provided suggested revisions.

Dr. Sarah P. Church, Associate Professor, Planning, Department of Earth Sciences, Montana State University, sarah.church@montana.edu

Dr. Patrick Hurley , Professor and Chair, Department of Environment and Sustainability, Ursinus College, 601 E. Main Street, Collegeville, PA 19426, phurley@ursinus.edu

Dr. Emily S. Silver, Assistant Professor, Human Dimensions of Natural Resources, Michigan State University, 413-320-2396, ehuff@msu.edu

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.

We will confer with key informants in each location prior to conducting information collections for suggestions on simplifying or improving the data collection process in their community. We will adhere to legal requirements of EO 13175: Consultation and Coordination with Indian Tribal Governments where appropriate. We do not anticipate requesting participants to keep records.

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9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

A modest non-monetary incentive, such as local museum passes or a book, may be offered to members of the public who participate in interviews or focus groups. Such tokens will be nominal in value and will be used to increase participation and to signify mutual respect between the researchers and participants.

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

1. Confidentiality and/or anonymity of participants and places will be assured by keeping any personal identifying information separate from information about non-timber forest product harvesting provided in interviews, focus groups, surveys, or observation. The exception will be instances in which individuals explicitly request to have their names associated with the information they provide (this is sometimes requested by research participants). This is in keeping with the evolution of practice in the wider social sciences.

In compliance with EO 13175, Consultation and Coordination with Indian Tribal Governments, Tribes may wish to voluntarily disclose and share information regarding their uses of non-timber forest products for traditional and cultural purposes. Prohibition on disclosure, if desired by Tribal government or the federal government, regarding the release of information on American Indians and Alaskan Native's uses of non-timber forest products is addressed in Title 25, Chapter 32A Cultural and Heritage Cooperation Authority, § 3056.

In case of FOIA requests for specific information, we will disclose what is required by law. Personal or financial information would be kept confidential under FOIA exemptions 4 ("information that concerns business trade secrets or other confidential commercial or financial information") and 6 ("information that, if disclosed, would invade another individual's personal privacy").

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

Study participants will be clearly told that they need not answer any questions on subjects they consider sensitive. Any information from American Indians and

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Alaskan Natives will adhere to EO 13175 and American Indian Religious Freedom Act (AIRFA), 16 U.S.C. 1996.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.

- a) Description of the collection activity**
- b) Corresponding form number (if applicable)**
- c) Number of respondents**
- d) Number of responses annually per respondent,**
- e) Total annual responses (columns c x d)**
- f) Estimated hours per response**
- g) Total annual burden hours (columns e x f)**

Following is an informed reasonable estimate of the total number of participants over the next three years. A variety of instruments and platforms will be used to collect information from respondents. We anticipate that over a three-year period, there will be no more than 1,560 respondents (estimating 520 respondents per year). Given these estimates, the total burden hours over the three years will not exceed 828 burden hours (estimating 276 hours per year); this estimate includes the amount of time for respondents and non-respondents. Please see the attached "Burden Hour and Annualized Cost", Table 1 for more detail.

Typically, each respondent would be expected to participate by interview, focus group, or survey one time with no follow-up unless requested by the individual. In certain circumstances where a longitudinal or pre/post study is warranted, some participants may volunteer to provide information more than once. The number of participants in each location will depend on the size and diversity of the general population in that location, as well as the number of foragers in the area.

For the purposes of estimating and budgeting for the overall three-year burden for this collection, we have made the basic assumptions outlined in the attached "Burden Hour and Annualized Cost". Each individual collection generic will

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provide the specific estimates of burden related to that particular collection, along with an explanation of how those estimates were determined.

Record keeping burden should be addressed separately and should include columns for:

- a) Description of record keeping activity:**
- b) Number of record keepers:**
- c) Annual hours per record keeper:**
- d) Total annual record keeping hours (columns b x c):**

There are no record-keeping requirements placed upon the respondents.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

We estimate the total dollar value of the burden hours for this collection (over a three-year period) to be \$27,730 (estimate of \$9,243 per year). We arrived at this figure by multiplying the estimated burden hours over a three-year period by \$33.49, the wage rate based on the Independent Sector national valuation of volunteer time for 2024. Value of Volunteer Time Report | Independent Sector Resources / Accessed November 1, 2024.) We used this rate because this research is expected to draw people from a wide range of employments, cultural backgrounds, ages, locations, and life circumstances.

13. Provide estimates of the total annual 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 and 14). The cost estimates 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.

There are no capital operation and maintenance costs.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The response to this question covers the actual costs the agency will incur as a result of implementing the Information Collection. The

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estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- **Employee travel costs**
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Please see the attached "Burden Hour and Annualized Cost", Table 2 for estimates of annualized cost for the federal government associated with this generic information collection. Given that we expect projects in several places across the United States, we used Denver, Colorado, federal employee pay schedule, to estimate cost. In many cases, federal employees or non-federal partners on the project will already have the necessary software, but as there may be cases where this is not the case, we estimate a one-time cost to include possible purchase of sampling frame or data analysis software. Per year, we estimate a cost to the federal government of \$49,589.50, which includes some time of a principal investigator, some time of multiple project technicians, travel cost, and a one-time purchase as noted above.

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.

There are no program changes or adjustments.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

In general, summarized, descriptive, comparative (e.g., Analysis of Variance), or modeling (e.g., Structural Equation Modeling) statistics of collected information may be shared in presentations or published in peer-reviewed journal articles, other publications, or on websites that are practitioner-oriented (specific analytic methods to be used in any given survey will be described in the review package submitted to OIRA prior to data collection). Possible professional journals include those that focus on natural resource management, natural resource policy, and open space design such as *Urban Forestry and Urban Greening*, *Ecology and Society*, *Society and Natural Resources*, *Landscape and Urban Planning*, *Forest Science*, *Journal of*

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Forestry, Small Scale Forestry, and Human Ecology Review. Analysis and tabulation of data will follow established social science protocols. Practitioner-oriented media include The National Recreation and Parks Association magazine and the Journal of the American Planning Association, web pages, and plain language research summaries targeted to land managers and policy makers.

Any information on non-timber forest products use by Tribes, if applicable, may have particular aspects or specific details removed prior to publication or public release in compliance with Chapter 32A Cultural and Heritage Cooperation Authority, Prohibition on Disclosure. The release of information on American Indians and Alaskan Native's uses of non-timber forest products is addressed in Title 25, Chapter 32A Cultural and Heritage Cooperation Authority, § 3056.

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.

The valid OMB control number and expiration date will be displayed on all Information Collection instruments.

18. Explain each exception to the certification statement, "Certification Requirement for Paperwork Reduction Act."

The agency is able to certify compliance with 5 CFR 1320.