



May 10, 2026

Submitted via Federal Register

Re: Agency Information Collection Activities; Evaluation of the Arctic Rivers Project

U.S. Geological Survey

OMB Control Number: 1028-0136

To Whom It May Concern:

The Northern Alaska Environmental Center (NAEC) appreciates the opportunity to submit comments on the U.S. Geological Survey's proposed renewal of the information collection for the Evaluation of the Arctic Rivers Project. NAEC supports renewal of this information collection. Arctic river systems are experiencing rapid climate-driven change, and continued evaluation of the Arctic Rivers Project is necessary to ensure that its science, tools, and communications remain useful to Alaska Native Tribes, Tribal organizations, Indigenous Knowledge holders, rural communities, resource managers, and conservation partners. We offer the following comments in response to the specific questions identified in the Federal Register notice.

1. Necessity and practical utility of the information collection

The collection of information is necessary for the proper performance of USGS's functions and has clear practical utility. The Arctic Rivers Project addresses issues of direct importance to Arctic communities and ecosystems, including changing hydrology, river ice, erosion, permafrost thaw, fish habitat, water quality, and subsistence impacts. Interviews, surveys, and polls can help USGS understand whether the project's products are relevant, accessible, and useful to those most affected by Arctic river change.

This information collection is particularly important because scientific products are most effective when they are shaped by the needs and lived experiences of the communities, Tribes, and organizations that may use them. Evaluation should help USGS determine not only whether outreach occurred, but whether the project is improving decision-making, supporting climate adaptation, and responding to community-identified priorities.

2. Accuracy of the burden estimate

USGS estimates that each response will take approximately 30 minutes. That estimate may be reasonable for a short survey or poll, but it may underestimate the time needed for meaningful participation by Tribal governments, Tribal organizations, and community-based experts. Respondents may need time to review project materials, consult with leadership or staff, consider sensitive cultural or subsistence information, and determine what information can appropriately be shared.



NAEC recommends that USGS distinguish between the expected burden for short surveys, polls, and more detailed semi-structured interviews. The agency should also recognize that Tribal staff, community experts, and Indigenous Knowledge holders are often asked to participate in many federal information-gathering processes, and their time should be treated as an expert contribution.

3. Ways to enhance the quality, utility, and clarity of the information collected

USGS can enhance the quality, utility, and clarity of the information collected by using plain-language questions, clearly explaining how responses will be used, and ensuring that participants understand whether and how their feedback may influence future project direction. Evaluation questions should ask whether the Arctic Rivers Project is useful in practice, including whether its products support community planning, subsistence protection, watershed stewardship, fish and wildlife management, climate adaptation, and communication with decision-makers.

USGS should also ensure that the evaluation respects Tribal sovereignty, Indigenous Knowledge, and Indigenous data sovereignty. Participants should receive clear information about confidentiality, consent, treatment of sensitive cultural or subsistence information, and any opportunities for review before information is summarized or shared publicly. Where appropriate, USGS should work with Tribal partners to shape evaluation questions and interpret results.

4. Ways to minimize the burden on respondents

USGS should minimize respondent burden by offering multiple ways to participate, including electronic surveys, phone or video interviews, written responses, and community-preferred formats. The agency should allow flexible scheduling, provide questions in advance, avoid duplicative requests, and tailor questions to the respondent's role and familiarity with the project.

To reduce burden and improve participation, USGS should provide concise background materials, plain-language summaries, and clear instructions. Where appropriate, the agency should consider compensation, honoraria, or other support for Tribal representatives, community experts, and Indigenous Knowledge holders whose time and expertise are essential to a meaningful evaluation.

NAEC supports approval of this information collection. Continued evaluation of the Arctic Rivers Project can strengthen community-centered science, improve communication, and ensure that the project remains responsive to the needs of Arctic communities and ecosystems. USGS should use the evaluation results to improve the practical utility, accessibility, and accountability of the Arctic Rivers Project, while respecting Tribal sovereignty, Indigenous Knowledge, and the time and expertise of Arctic communities.



Sincerely,

A handwritten signature in black ink, appearing to read "K Lapp". The signature is fluid and cursive, with a prominent loop at the end.

Krystal Lapp, Interim Executive Director