

**Supporting Statement for Paperwork Reduction Act Submissions**  
**“Research Permit and Reporting System Applications and Reports**  
**(36 CFR 2.1 and 2.5)”**  
**OMB Control Number 1024-0236**

**Terms of Clearance:** None

**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 National Park Service (NPS) Organic Act of 1916 (16 U.S.C. 1) provides that park resources are to be conserved for enjoyment of present and future generations of people. This act also (16 U.S.C. 3) authorizes the establishment of regulations to govern the use and management of units of the National Park System. The National Parks Omnibus Management Act of 1998 (NPOMA, Sections 201 (4) and 201 (5) - 16 U.S.C. 5931) encourages both use of parks for study to benefit park management and broader science, and also publication of information derived from studies conducted in the National Park System. Section 205 of the NPOMA (16 U.S.C. 5935) constrains use of parks for scientific study to those studies that are consistent with the laws and management policies of the parks and that can be conducted in a manner that poses no threat to park resources or public enjoyment. Appendix A provides the text of these sections of law. The NPS has existing regulations that prohibit the disturbing, removing, or possessing of natural, cultural, and archeological resources (36 CFR 2.1) and that govern the collection of specimens in parks (36 CFR 2.5) for the purpose of research, baseline inventories, monitoring, impact analysis, group study, or museum display. Appendix B provides the text of these sections of the regulations. The NPS uses a permit system to manage the conduct of scientific research and collecting in parks.

Scientific studies and science education activities in parks that might disturb resources or visitors, require the waiver of any regulation, or involve the collecting of specimens generally are conducted under permit. NPS policy regarding studies and collections requires that studies, including surveys, inventories, monitoring, research, and data and specimen collection, conducted by other than NPS employees on official duty will require an NPS scientific research and collecting permit. This policy also requires that all studies conform to NPS policies and guidelines regarding collection, reporting, and publication of accomplishments and data; conduct of studies; wilderness restrictions; and requirements identified in the terms and conditions of a permit. In addition, this policy requires that projects be administered and conducted by fully qualified personnel and conform to current standards of scholarship. Finally, this policy provides that researchers who apply for and receive scientific research and collecting permits may be asked, based on NPS analysis of the individual study proposal and as an agreed condition to the associated permit, to provide a variety of products to the park issuing the permit. In keeping with the public nature of parks, NPS expects that results of all scientific

activities conducted in parks will be made available to the public through both technical and popular publication outlets, and that permanently retained natural resource collections and associated field records will be managed as museum collections. Appendix C provides the relevant sections of NPS Management Policies 2006. During the past six years, NPS has found the existing scientific research and collecting permit system being used also by applicants who seek permission to conduct science education activities in parks.

The NPS has a long tradition of soliciting and disseminating annual progress reports from scientists holding NPS permits to conduct scientific research and collecting in parks. Section 201 (5) of NPOMA (16 U.S.C. 5931) encourages the publication and dissemination of information from studies conducted in parks. One mechanism for fulfilling this encouragement is the annual collection and publication by the NPS of information from permittees about the interim results and findings of permitted research being conducted in the parks. A second mechanism for fulfilling this encouragement is to involve scientists who want to conduct science education activities in parks.

**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.]**

Before making a decision whether or not to issue a requested permit, the park manager uses information collected in a scientific research and collecting permit application or a science education permit application to ensure that:

- a) the applicant is appropriately qualified;
- b) the proposed work is for the purpose of furthering scientific knowledge in the public interest;
- c) the proposed work is not inconsistent with any management plan or established policy, objectives or requirements applicable to management and use of the park concerned;
- d) the possible impacts of the proposed work are sufficiently well described to permit the park, as one basis for determining whether or not to issue the requested permit, to conduct whatever levels of review and analysis are required to comply with the amended National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327) and section 106 of the amended National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.);
- e) where the work proposed is also governed by permits issued by other authorities, the applicant has obtained written consent from those other authorities;
- f) the museum or other institution proposed as the repository of any collections that are requested to be made is appropriately qualified and willing to document, preserve, and provide appropriate public access to the collected resources and associated records; and
- g) the applicant agrees in writing to make the results of the applicant's studies or science

education activities appropriately available to the public.

Failure to collect information from applicants who are requesting permission to conduct scientific research and collecting studies or science education activities on park lands, and subsequent failure to issue permits to those applicants, would result in the prohibition of such studies or science education. Individuals who conduct scientific studies or science education activities without a valid scientific research and collecting or science education permit would be in violation of NPS policy and may be denied scientific research and collecting or science education permits in the future. Individuals who conduct studies or science education activities that disturb park resources or involve collecting of scientific samples or specimens without a permit would be in violation of the regulations regarding preservation of natural, cultural and archeological resources and the taking of research specimens (36 CFR 2.1 and 2.5) and may be subject to applicable criminal and civil penalties.

The park manager reviews the information collected in the Investigator's Annual Report to ensure that the scientist is complying with the terms and conditions of the scientist's permit and that key findings of the scientific study or science education activity are being made available to the public. The park manager also uses this information for park resource management and visitor education purposes.

Failure to collect information in an Investigator's Annual Report would limit the park manager's ability to conduct periodic reviews of the appropriateness of having the work conducted in the park and would prevent the park manager from disseminating to the public information about that work. Failure to collect information in interim or final reports or as copies of published articles would prevent the park manager from incorporating information gained about the studied resources into existing park resource inventories, plans, interpretation programs, management programs, and data bases. Failure to collect the information also would cause the park manager to have to conduct duplicative studies when the park manager needed information about the resources for program planning, management, and science education purposes.

**Explanation of questions contained in Form 10-741a, Application for a Scientific Research and Collecting Permit (Appendix D):**

Page 1, first box –

Name of the National Park System area(s) you are applying to:

Select one of the following: [ ] New application, [ ] Renewal of a previously issued permit [ ] Modification of a previously issued permit

Please enter numbers for permit renewal or modification requests:

Previously assigned NPS study number: \_

Previously assigned NPS permit number:

These questions identify the park to which the applicant is applying; whether the application is for a new permit or is for a renewal or modification of a previously issued permit; and, for a renewal or modification, what are the previously assigned study and permit numbers. Note that previously assigned NPS study number and NPS permit number are automatically pre-

filled when applicants use the on-line permit renewal application option. NPS uses this information to direct the application to the appropriate park, to determine what type of permit action is being requested, and to determine the application's relationship to previously issued permits.

Page 1, second box –

[Dr., Mr., Mrs., Ms.] First name: Last name:

Mailing address

Name of the current institution represented

Office phone #:

Alternative phone #:

Office FAX #:

Office email address of principal investigator:

Additional investigators or key field assistants (first name, last name, office phone, office email)

These questions request contact information for the principal investigator (including title, first and last names, institution represented, phone, fax, and email information) and for additional investigators or key field assistants (first and last names, phone number, and email information). NPS uses this information to prepare the permit, to provide mechanisms for contacting applicants, and to know what people in addition to the applicant will be working on the project if it is assigned a permit. Because scientific research and collecting permits grant permissions for activities in the park which might otherwise be illegal, this information is particularly important to park law enforcement staff.

Page 1, third box –

Project title (maximum 300 characters)

Purpose of the study (maximum 4000 characters)

Summary of proposed field methods and activities (extract from the study proposal where appropriate - maximum 4000 characters)

Initial starting date of the study:

Estimated date the entire study may end:

Date to begin study within the park this application year:

Date to end study within the park this application year:

Will field study need to continue within the park next year (Yes/No):

Activity Type (select one): Research Inventory Monitoring Other \_\_\_\_

Do you anticipate receiving funding assistance from the U.S. Federal Government for this study? (Yes or No) If "Yes," specify the agency(s):

Where will data, maps, photos, etc. (not specimens) reside upon completion of this study?

Location(s) where you propose activities will take place within the National Park System area(s):

Your proposed method of access (vehicles, aircraft, boat, snowmobile, foot, etc.):

These questions request information about the proposed scientific study, including title, purpose, summary of field methods and activities, schedule for the entire study, schedule for

the study to be active in the park in the year for which the application is being submitted, whether or not the field portion of the study will continue in a future year, type of activity to be conducted, federal agency providing funds for the study, if any, repository for non-specimen products of the study, proposed study locations within the park, and proposed methods of access to those locations. NPS uses this information to assess appropriateness of having the study be conducted in the park; possible impacts caused by the study to park resources, visitors, and operations; type of federal role, if any, in the study; and location of study findings to assist the park in obtaining information about those findings for use in park interpretive and resource management activities.

Page 2, first box –

Would you like to handle or collect specimens? (Yes or No)

*If you respond “Yes,” please complete this entire section of the application (otherwise you may skip the remainder of this section).*

Proposed disposition of specimens identified for handling or collection (mark all that apply):

Temporarily captured or handled (may include marking) and then released undamaged in place

Will be destroyed through analysis or discarded after analysis

Permanently retained in National Park Service collection, maintained in NPS repository

Permanently retained in National Park Service collection, maintained in one or more non-NPS repositories identified in attached Appendix A

These questions determine whether or not the applicant seeks to handle specimens and, if so, what specimens and for what types of handling. NPS uses this information to assess the possible impact of the study on park resources and to establish the proper process for tracking the disposition and care of the specimens (which are accountable federal property) over time.

Page 2, second box –

*I certify that this application is accurate and complete. I understand a formal study (research) proposal for new or modified studies must be provided to NPS before this application can be considered. I authorize the National Park Service to seek peer reviews of my proposal.*

Signature of principal investigator: \_\_\_\_\_ Date: \_\_\_\_\_

These questions obtain the certification by the applicant that the application is accurate and complete, that the applicant understands the requirement for submission of a study proposal, and that the applicant authorizes NPS to obtain peer review of the applicant’s study proposal. NPS uses this information to accept the applicant’s submission to NPS and then to conduct a review of the submission and determine whether or not to issue the applicant a permit.

Page 3, Appendix A, – Appendix A provides the applicant the opportunity to request that specimens collected as part of the applicant’s study be loaned by NPS to a repository of the applicant’s choice.

Page 3, Appendix A, first box –  
Principal Investigator:  
Office phone #:  
Office FAX #:  
Office email address:  
Project title (maximum 300 characters):  
Scientific description of specimens proposed to be collected and loaned to the non-NPS institution identified below (include taxonomic group or name, or type of material; sample size, quantity, frequency, and location):

These questions provide the applicant the opportunity to identify for the proposed repository manager information about the applicant, means for contacting the applicant, title of the study, and description of the specimens proposed for collection and loan to the repository. NPS uses this form to have the applicant provide information about the applicant and the applicant's study to the proposed repository. The internet-served application option pre-fills all data in this box, as they are data which have been submitted at an earlier point in the application process.

Page 3, Appendix A, second box –  
Institution: Address: Office Phone #: Office Fax #: Responsible official Email:  
(Signature of responsible official at custodial institution) (Date)  
(Name of responsible official – please print) (Title of responsible official – please print)

These questions identify name, address, and contact information of the institution the applicant proposes to have receive the specimens on loan from NPS, and obtain from the proposed repository the name, title, and signature of the repository official who agrees to having the repository receive the specimens on loan from NPS. NPS uses this information to determine whether or not to have the permit authorize storage of the specimens in a non-NPS repository.

**Explanation of questions contained in Form 10-741b, Application for a Science Education Permit (Appendix E):**

Page 1, first box –  
Name of the National Park System area(s) you are applying to:  
Select one of the following: [ ] New application [ ] Renewal of a previously issued permit [ ] Modification of a previously issued permit  
Please enter numbers for permit renewal or modification requests:  
Previously assigned NPS study number: \_  
Previously assigned NPS permit number:

These questions identify the park to which the applicant is applying; whether the application is for a new permit or is for a renewal or modification of a previously issued permit; and, for a renewal or modification, what are the previously assigned activity and permit numbers.

Note that previously assigned NPS study number and NPS permit number will be automatically pre-filled when applicants use the on-line permit renewal application option. NPS uses this information to direct the application to the appropriate park, to determine what type of permit action is being requested, and to determine the application's relationship to previously issued permits.

Page 1, second box –

[Dr., Mr., Mrs., Ms.] First name: Last name:

Mailing address

Name of the current institution represented

Office phone #:

Alternative phone #:

Office FAX #:

Office email address of principal investigator:

Additional investigators or key field assistants (first name, last name, office phone, office email)

These questions request contact information for the activity leader (including title, first and last names, mailing address, institution represented, phone, fax, and email information) and for the person expected to back up the activity leader during visits to the park (first and last name). NPS uses this information to prepare the permit, to provide mechanisms for contacting applicants, and to know what person in addition to the applicant will be working on the project if it is assigned a permit. Because Science Education Permits grant permissions for activities in the park which might otherwise be illegal, this information is particularly important to Park Law Enforcement staff.

Page 1, third box –

Name or title of proposed science education activity (maximum 300 characters)

Purpose and brief description of the activity (maximum 4000-characters)

Proposed field methods and activities (summarize from the proposal where appropriate – maximum 4000 characters)

Planned number of instructors and leaders:

Planned number of students:

Indicate educational levels of this activity (select all that apply): K-6 7-12 Higher\_

Initial starting date of the activity:

Estimated date the entire activity may end:

Date to begin activity within the park this application year:

Date to end activity within the park this application year:

Number of times the field activity will be conducted this application year:

Will the field activity need to continue within the park next year (Yes/No):

Do you anticipate seeking any waiver of fees or other NPS assistance in conjunction with this activity? (Yes or No): If "Yes," please explain:

Location(s) where you propose activities will take place within the National Park System area(s):

Your proposed method of access (bus, van, car, other vehicle, aircraft, boat, snowmobile, foot, other):

These questions request information about the proposed science education activity, including title, purpose, summary of field methods and activities, planned number of instructors and leaders, planned number of students, education levels of students, schedule for the entire activity, schedule (for the activity to be active in the park in the year for which the application is being submitted, number of times the activity will be conducted in the park during the application year, and whether or not the field portion of the activity will continue in a future year), whether or not the applicant will seek a fee waiver or the provision of NPS assistance, proposed activity locations within the park, and proposed methods of access to those locations. NPS uses this information to assess appropriateness of having the activity be conducted in the park; possible impacts caused by the activity to park resources, visitors, and operations; and type of federal role, if any, in the activity. NPS uses this information to assess appropriateness of having the science education activity be conducted in the park and to assess possible impacts caused by the activity to park resources, visitors, and operations.

Page 2, first and second boxes –

Would you like to temporarily handle or collect specimens? (Yes or No)

*Scientific description of specimens to be handled or collected (include taxonomic group or name, or type of material; sample size, quantity, frequency, and location):*

A) Specimens to be handled and returned unmodified to the place of collection:

B) Specimens to be handled and used up in the activity:

The first question determines whether or not the applicant seeks to handle specimens as part of the requested science education activity. For requests that include handling of specimens, the second box asks for information about the kinds of specimens and handling methods involved. NPS uses this information to assess the possible impact of the study on park resources, visitors, and operations.

Page 2, third box –

*I certify that this application is accurate and complete. I understand a formal science education activity proposal may have to be provided to NPS before this application can be considered. I authorize the National Park Service to seek peer reviews of my proposal.*

Signature of activity leader: \_\_\_\_\_ Date: \_\_\_\_\_

These questions obtain the certification by the applicant that the application is accurate and complete, that the applicant understands the requirement for possible submission of a science education activity proposal, and that the applicant authorizes NPS to obtain peer review of the applicant's science education activity proposal, if such a proposal is required. NPS uses this information to accept the applicant's submission to NPS and then to conduct a review of the submission and determine whether or not to issue the applicant a permit.

**Explanation of questions contained in Form 10-226, Investigator's Annual Report (Appendix F):**



Page 1, first half of first box –

Reporting Year:

Park:

Select the type of permit this report addresses: Scientific Study Science Education Activity

Name of principal investigator or responsible official: [Dr. Ms. Mr. Mrs.] First name: Last name:

Office Phone:

Mailing address:

Office FAX:

Office Email:

Additional scientific study investigators (first name, last name):

These questions identify the reporting year, the park to which the permit holder is submitting the report; the type of permit for which the permit holder is submitting a report; contact information for the responsible official (including title, first and last names, mailing address, phone, fax, and email information); and first and last names of additional study investigators. All information in this section is automatically carried from the permit data record and entered into the Investigator Annual Report form when the permit holder uses the on-line report submission option. NPS uses this information to ensure reports are connected to permits, to track and update contact information, and to provide contact information to the public when the reports are made publicly available on the Internet.

Page 1, second half of first box –

Project Title (maximum 300 characters):

Park-assigned Study or Activity #:

Park-assigned Permit #:

Permit Start Date:

Permit Expiration Date:

Scientific Study Starting Date:

For either a Scientific Study or a Science Education Activity, the status is (select one): Completed Continuing \_ Suspended \_ Terminated before completion

Subject/Discipline (maximum 60 characters):

These questions provide information about the project for which the report is being submitted, including title, study or activity number, permit number, permit start and expiration dates, scientific study start and estimated end dates, project status, status of deliverables for a scientific study, activity type, and subject or discipline. All information in this section of the IAR (with the exceptions of the status question) is automatically carried from the permit data record and entered into the Investigator Annual Report form when the permit holder uses the on-line report submission option. NPS uses this information to ensure report submissions relate to permits and to update NPS records regarding the status of the study or activity being reported.

Page 1, second box –  
Purpose of Scientific Study or Science Education Activity during the reporting year  
(maximum 4000 characters):

The initial response to this question is entered automatically by the software from the application and permit database, with the respondent being given the opportunity at the time of preparing this report to change the description to reflect any changes made during the reporting year. NPS uses this information to track changes in the objectives or methodologies over time.

Page 2, first box –  
Findings and status of Scientific Study or accomplishments of Science Education  
Activity during the reporting year (maximum 4000 characters):

The applicant reports findings and status or accomplishments of the applicant’s activities in the park during the reporting year. NPS uses this information to track the progress of the study and to inform the NPS interpretation programs about the findings of research being conducted in the park.

Page 2, second box –  
For Scientific Studies (not Science Education Activities), were any specimens  
collected and removed from the park but not destroyed during analysis? Y\_\_ N\_\_  
If “Yes”, identify where the specimens currently are stored:

Funding specifically used in this park this reporting year that was provided by NPS  
(enter dollar amount): \$

Funding specifically used in this park this reporting year that was provided by all other  
sources (enter dollar amount): \$

List any other U.S. Government Agencies supporting this study or activity and the  
funding each provided this reporting year:

These questions ask about status of specimens removed from the park and amounts and sources of funding. NPS uses this information to track the status of specimens removed from the park and to compile information about funding which is of use in preparing annual reports NPS is expected to submit.

Automation helps the respondent complete the Investigator’s Annual Report because data for most of the data fields in the first page of the report are entered automatically by the software system from information contained within the Research Permit and Reporting System database. The respondent completes the status questions, has the opportunity to verify the other information, and, for some of the pre-filled fields, can make corrections on line. For making corrections to contact information, NPS security procedures require that the respondent’s email address on record be current or that the respondent must contact NPS to arrange for corrections. The respondent completes the findings and status information requested on the second page of the Investigator’s Annual Report.

The public uses all of the information contained in the Investigator's Annual Reports to learn about the purpose, nature, and interim findings of studies or activities conducted in units of the National Park 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 NPS provides an Internet-based, automated process at <http://science.nature.nps.gov/research> which respondents who have access to the Internet may use to prepare and submit electronically both the permit application and the required Investigator's Annual Report. NPS makes electronic or paper copies of the information collection forms available by fax or mail to those few respondents who are unable to supply the requested information through the Internet.

The collection of information for the application for a permit and for the annual report is streamlined to keep projects that are not complex from having to submit more information than is necessary to enable the park manager to make a decision about the application request or the submitted report. The electronic linkage of the two information collections benefits respondents once they have entered the data base because the electronic system automatically enters data into many of the data fields on these forms whenever the respondents next access the system. Once an applicant has submitted the first application, the electronic system automatically pre-fills data fields which are not unique to each new IAR or Application. For example, applicant contact information is stored in a profile table which automatically populates contact information fields. The system also provides a permit renewal application option. When a park issues a permit, the data on that permit pre-fills most fields on the renewal application should the applicant need to apply for a permit to continue the project. The internet-supplied application process also prompts applicants for answers in those data fields that require new information. NPS provides the Internet-based submission opportunity both to streamline the submission process for the respondents and also to streamline NPS preparation of permits and NPS review of annual reports prior to releasing the annual reports for public access via the Internet.

**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.**

Information requested on the Application for a Scientific Research and Collecting Permit form (Form 10-741a), on the Application for a Science Education Permit form (Form 10-741b), and on the Investigator's Annual Report form (Form 10-226), is unique to the applicant and no other source is available. Permit applications and the resulting reports are project-specific. No duplication would occur. Since circumstances for conducting scientific studies, collecting scientific specimens, and conducting science education activities in parks vary with each

project, there is no available project information that can be used in lieu of that supplied on each application form or annual report form. However, data which an applicant has previously entered into the electronic data base, and which apply to later applications or IARs, are automatically transferred to the appropriate electronic form whenever the applicant uses the Internet-based system.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The steps involved in applying for a Scientific Research and Collecting Permit, or a Science Education Permit, and in submitting the Investigator's Annual Report, are not large in terms either of personnel time or materials cost.

**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 information collection requests are made only in response to an applicant's expressed desire to conduct scientific research and collecting, or science education in a park to address the applicant's own specific research question or science education purpose. The information cannot be collected less frequently. If the information is not collected at all, then neither the respondent nor the NPS can achieve the mutually desired purpose of using parks for scientific research and collecting activities and science education. Failure to encourage use of parks for these scientific purposes would contradict both statute and NPS policy.

**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.**

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.

- 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. [Please list the names, titles, addresses, and phone numbers of persons contacted.]**

**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.**

The NPS published a 60-day Federal Register Notice to solicit public comments on March 8, 2007 (Vol. 72, pages 10553-10554). NPS used the Research Permit and Reporting System (RPRS) to automatically contact 3,588 non-Federal and Federal permittees and permit applicants who were active in calendar years 2006 and 2007 to inform them of the opportunity to submit comments. NPS used the Research Permit and Reporting System to automatically contact 687 park curators and park research coordinators to inform them of the opportunity to submit comments. The NPS RPRS system manager contacted 19 NPS regional office employees to inform them of the opportunity to submit comments. NPS posted a notice on the RPRS home page which informed visitors of the 60 day comment period, solicited comments, and provided a link to a web page which provided information about the Federal Register notice and provided electronic access to the notice, the three forms, and two guidance documents. This page was posted from March 13, 2007 to May 5, 2007. Available to any visitor to the RPRS web sites during this time period, it registered 597 hits. In response to these different pathways for informing the public, NPS received at least one comment directly from the public in response to the Federal Register notice and an overall total of 13 comments from the public and 26 comments from NPS staff.

Of the 13 responses received from the public, one said the requested information and the time needed to fill out the forms are reasonable, another said the park review and decision process is difficult and onerous and that too much documentation is required, and a third said having each park make its own permit decision is unnecessarily piecemeal, arbitrary, and burdensome. Four respondents said the on-line application process is efficient and straight forward, one saying “the forms and the ability to access on line and report on line make the

application and compliance process very easy”. One respondent said it is difficult to figure out how to submit “things”. Several respondents discussed questions outside this request for review, with three wanting NPS to change its collections ownership procedure and one wanting NPS to issue permits on a Service, rather than park, basis. Five respondents specifically addressed the education application and permit, saying that it would have benefits, and one or more of these five offered ideas about what types of education activities should receive specific types of consideration, simplifying the application process, treatment of collections, different treatment for different types of activities, ability to change the program leader without reissuing a permit, and having the park offer a fee waiver for permitted education activities. Appendix I provides the names and Email addresses of members of the public who commented in response to the 60-Day Federal Register Notice.

The complete and partially reformatted comments received from the public follow:

<p><b>David Bowman</b> &lt;<a href="mailto:dbowman@fullerton.edu">dbowman@fullerton.edu</a>&gt; &gt; 03/28/2007 05:12 PM MST</p>	<p>To:waso_nrss_researchcoll@nps.gov cc: Subject: Proposed NPS Educational Research Permits</p>
<p>I strongly endorse the creation of a nationwide online education research permit system. This would be an enormous benefit to instructional activities of all levels, while clearly (and demonstrably) bolstering the educational mission of the NPS.</p> <p>If you'd like additional comments or information, please don't hesitate to contact me.</p> <p>David Bowman Associate Professor email: <a href="mailto:dbowman@fullerton.edu">dbowman@fullerton.edu</a> Dept. of Geological Sciences tel: +1 (714)278-5436 California State University fax: +1 (714)278-7266 Fullerton, CA 92834-6850</p> <p><a href="http://geology.fullerton.edu/dbowman">http://geology.fullerton.edu/dbowman</a></p>	
<p><b>"Jim Cane"</b> &lt;<a href="mailto:jcane@biology.usu.edu">jcane@biology.usu.edu</a>&gt; 04/06/2007 12:24 PM CST</p>	<p>To:&lt;waso_nrss_researchcoll@nps.gov&gt; cc: Subject: NPS collection permitting and info collection</p>
<p>Dear Folks- I have worked with native bee communities in national parks of the western US for 2 decades now. Because my research is typically comparative over wide geographic areas, it involves brief visits to a number of widely spaced localities. Parks are desirable collection points, because their land protection means that long-term studies of faunal change I unlikely to be compromised through destructive land use. However, I have found the NPS permitting and reporting system to be unnecessarily piecemeal, arbitrary and burdensome, mostly because each park operates as an independent entity. That works great if a scientist spends their research year in one park. For wide-ranging comparative studies, my notebook of NPS contacts, permits and reports can be as large as</p>	

my data notebook, and the time devoted to permit acquisition and reporting can take as much time as the day devoted to sampling native bees from a particular park. Some parks encourage and facilitate research; some seem more interested in collecting paperwork than knowledge of their biota. In one case at one Monument, the person handling permits proved so impossible (for the exact same study as performed at 7 parks that year) that after 4 months I just gave up, leaving that Monument ignorant of the bee fauna that they are supposed to be protecting. The overall result is that increasingly I avoid doing research in National Parks, because I can't afford the days and days of hassles to provide duplicate information for every entity.

At one time, I had suggested to the NPS that approved investigators be given a credit-card sized embossed permit with the person's photo, just like some bank credit cards today. It would be swiped and signed at each park in person (so that special instructions or restrictions could be communicated to the investigator), saving the inane duplication of effort by both park folks and scientists. It could be used to pull up all of the needed info from a central NPS computer. If it is multi-park research, then a single report would be generated, received centrally, and dispersed to the relevant parks. It would cut down on the projected 10,600 man-hours consumed by the current permitting process (that is 5 YEARS of annual work time that might be better spent). However, I received no response to the suggestion.

Yours,

Jim Cane

=====

James H. Cane

USDA-ARS Bee Biology and Systematics Lab

Utah State University, Logan, UT 84322-5310 USA  
tel: 435-797-3879 FAX: 435-797-0461

**John Carothers**  
<jocaroth@mac.com>

03/27/2007 10:13 PM MST

To: waso\_nrss\_researchcoll@nps.gov

cc:

Subject: comments on science education permit

Greetings-

I am a teacher that takes students into national parks for educational purposes. I like the proposed permit application, and wish to make a simple suggestion: make it an on-line application for ease of submission to you. This would make everyone's job a little easier. Thanks!

john

Dr. John H. Carothers  
Department of Biology  
Cabrillo College  
6500 Soquel Drive  
Aptos, CA 95003

[jocaroth@cabrillo.edu](mailto:jocaroth@cabrillo.edu)

**"Knott, Jeffrey"**  
**<jknott@Exchange.FULLERTON.ED**  
**U>**

03/28/2007 10:00 AM MST

To:<waso\_nrss\_researchcoll@nps.gov>  
cc:  
Subject: RE: NPS solicits comments  
concerning Research Permit and Reporting  
System information collection request.

I think that the establishment of an online science education research permit is an excellent idea provided that these permits are extended to educational groups that are entering and exiting the park with the intent of not collecting samples. For example, a 15-40 person university or college affiliated group entering Death Valley, Zion or Yellowstone National Park to observe the geologic and biologic aspects of the park. These groups would benefit from a fee entrance waiver that commonly accompanies research permits. Presently, these types of fee waivers are dealt on a park-by-park basis and vary from park-to-park. I have applied for a fee waiver for an educational group in Death Valley, Zion and Yellowstone in the last year and so I'm certain this is the case. I see several benefits to the park:

- 1) The park will see an increase in the applications of educational permits. This demonstrates the use of the parks for educational purposes. With the ambiguous paperwork presently required, many groups will simply forego the application and the Park does not receive credit for the educational group use.
- 2) Park personnel time would be better spent if the requirements are explained in the online application, thereby generating more "completed" permits and less time spent by personnel reviewing permits. They would only have to review the permit for the educational content.
- 3) With an easier application, the Park is more likely to be able to monitor groups in the Park.

Benefit for the educational groups:

- 1) The application process is streamlined and consistent.
- 2) Educational groups are more likely to visit the Park. I did not lead a group into Bryce last year due to the lack of a permit.
- 3) Educational groups will be more aware of the restrictions and freedoms allowable within the Park and therefore use the Park more effectively.
- 4) The fee waiver would relieve some of the financial burden to the educational institution.

-----  
Jeffrey R. Knott  
Assistant Professor



Dept. of Geological Sciences  
California State University Fullerton  
P. O. Box 6850  
Fullerton, CA 92834-6850  
jknott@fullerton.edu  
(714) 278-5547 - office  
(714) 278-7266 - fax

**"Judy Molnar"**  
**<judy.molnar@thevlm.org>**

03/28/2007 09:44 AM AST

To: <waso\_nrss\_researchcoll@nps.gov>

cc:

Subject: Initial Comments concerning Research  
Permit and Recording system

Friends

Thank you for the opportunity to comment on the permit and IAR system currently in place.

Our Permit is for butterfly counts and studies conducted on the Blue Ridge Parkway during the summer. These activities are a mix of science [conducting an annual NABA butterfly count] and science education, so I am glad to see the new category of Science Education permits proposed and look forward to seeing the new documents for those permits.

Comment on the Science Education Permit as posted:

Under "Indicate Education levels of this activity (select all that apply)" please consider including a line descriptive of informal educational activities, for example, "adults of all ages" or "general public." Our audience is a mixture of children and adults, with adults ranging in age and background education. Many times visitors to the Parkway will come up to us as we do our activity, join us for a brief time and be educated as well. In the form as it stands now, we would check all choices given and this would not record the difference between our informal adult contacts + parents with kids, and "higher" education [implying college+ level] students. Perhaps that difference isn't important to keep track of for your purposes. If that's the case then the form will work as it stands.

Comment on your estimate of "frequency of response" for any of the permits:

Originally, our science permit for the butterfly counts was good for only one calendar year. Once our permit was considered valid until 2010, it saved us a lot of time and paperwork, especially by doing each IAR over the web.

If respondents are given permits good for several years [versus only good for one year], then the frequency of response per respondent would be reduced overall.

Each respondent would have to make the initial permit application, then just submit the yearly IAR for the subsequent years during the permitted period.

To make things easier on the science education permits, please consider having them available for 5 or 10 year blocks [or whatever the individual educational goals may be]. A University may be more likely to make a long term commitment to studying a particular area if the faculty knew the permit was standing for a long period.

However, this may mean that the individual "principal investigator" may change more frequently, and if you require more than an annual notification of this then the frequency of response goes up accordingly.

Comment on the IAR process:

For cost effectiveness, our institution may change phone, Internet & e-mail providers. In the current system it is relatively easy to change co-investigator's contact information on an IAR, but it's a big effort to get the principal investigator's information updated. Please find a way to stream line this, ESPECIALLY in the case of the new science education permitting process. Educators connected to particular formal and informal institutions will change their contact information or positions frequently over time. Educators are also involved with many different projects and the less complex you can make this the better. If you decide to offer permits good for several years please make it easier for permit holders to update ALL information, including that of the Principal Investigator, on the IAR from year to year.

Thank you for the ability to transfer IAR report information from past years to the next, that is extremely helpful!

I hope you find these comments helpful.

Sincerely,  
Judy Molnar  
Education Associate  
Virginia Living Museum  
Newport News VA 23601

**Raquel Muniz**  
<ramusal@yahoo.com.mx>

03/28/2007 02:07 PM EST

To: waso\_nrss\_researchcoll@nps.gov  
cc:

Subject: Re: NPS solicits comments concerning  
Research Permit and Reporting System  
information collection request.

To whom correspond

I would liked to know if you can wait for me one more week. I need to analyze some data.

Thank you.

**waso\_nrss\_researchcoll@nps.gov** escribió:

To: Research Permit and Reporting System users, and interested parties

From: Research Permit and Reporting System administration

Subject: Review and comment period for 60-Day Notice of Intention To Request Clearance of Collection of Information

The NPS Research Permit and Reporting System (RPRS) collects information from the public by means of the Application for a Scientific Research and Collecting Permit and the

Investigator's Annual Report. RPRS administration plans to apply to the Office of Management and Budget for renewal of clearance for this collection of information. In addition to the scientific research and collecting permit application, you may wish to review the science education permit application form. RPRS administration is considering development of a science education permit routine to facilitate the review and processing of science education permit requests. To review and comment on the Federal Register notice, information collection forms, and guidance documents, please access the RPRS home page (<http://science.nature.nps.gov/research>) and refer to the notice titled "Review and comment period for NPS Research Permit and Reporting System Collection of Information Forms - March 13, 2007 to May 7, 2007".

**DRA. RAQUEL MUÑIZ SALAZAR**

Instituto de Ciencias Agrícolas  
Universidad Autónoma de Baja California  
Carretera al Delta s/n, Ejido Nuevo León  
Mexicali, Baja California  
Tel: 686-5230079 ext. 220

other email:[ramusal@uabc.mx](mailto:ramusal@uabc.mx)

**Raquel Muniz**  
<[ramusal@yahoo.com.mx](mailto:ramusal@yahoo.com.mx)>

04/05/2007 04:02 PM EST

To:WASO\_NRSS\_Researchcoll@nps.gov

cc:

Subject: okRe: NPS solicits comments concerning  
Research Permit and Reporting System information  
collection request.

Hello

Thank you. I'll do it.

**WASO\_NRSS\_Researchcoll@nps.gov** escribió:

Raquel,

The comment period extends to May 7, 07. Please do submit any comments you may have.

Best wishes,  
Bill Commins, NPS

|-----+----->

|| Raquel Muniz |

||| m.mx> |

|||

|| 03/28/2007 02:07 |

|| PM EST |

|-----+----->

||

| To: waso\_nrss\_researchcoll@nps.gov |

| cc: |  
| Subject: Re: NPS solicits comments concerning Research Permit and Reporting System  
information collection |  
| request. |

To whom correspond

I would liked to know if you can wait for me one more week. I need to  
analyze some data.

Thank you.

waso\_nrss\_researchcoll@nps.gov escribió:

To: Research Permit and Reporting System users, and interested parties  
From: Research Permit and Reporting System administration  
Subject: Review and comment period for 60-Day Notice of Intention To  
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The NPS Research Permit and Reporting System (RPRS) collects information  
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review the science education permit application form. RPRS administration  
is considering development of a science education permit routine to  
facilitate the review and processing of science education permit requests.  
To review and comment on the Federal Register notice, information  
collection forms, and guidance documents, please access the RPRS home page  
(<http://science.nature.nps.gov/research>) and refer to the notice titled  
"Review and comment period for NPS Research Permit and Reporting System  
Collection of Information Forms - March 13, 2007 to May 7, 2007".

DRA. RAQUEL MUÑIZ SALAZAR  
Instituto de Ciencias Agrícolas  
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Mexicali, Baja California  
Tel: 686-5230079 ext. 220  
other email:ramusal@uabc.mx

**jean public**  
<[jeanpublic@yahoo.com](mailto:jeanpublic@yahoo.com)>

03/08/2007 08:11 AM PST

To: waso\_NRSS\_RESEARCHCOLL@NPS.GOV,  
LEONARD\_STOWE@NPS.GOV  
cc: BILL\_COMMINS@NPS.GOV,  
AMERICANVOICES@MAIL.HOUSE.GOV  
Subject: public comment onf ederal register of

doi nps application for approval to re extend  
collection of information on

research permit  
application for scientific research  
applicatoin for science education permit  
investigators annual report

i would like to see a copy of these documents so i can  
make additional copies as to their validity and use  
for the spending of tax dollars for this collection of  
information.

i do know the public is getting junk science and  
biased science far too often these days - science  
politically motivated rather than true, clear  
"science" and am concerned about how tax dollars bring  
the real thing and not fake junk science.

can we bring truth and validity back to this process?

b. sachau  
15 elm st  
florham park nj 07932

**jean public**  
**<jeanpublic@yahoo.com>**  
03/13/2007 02:28 PM MST

To:WASO\_NRSS\_Researchcoll@nps.gov  
cc:  
Subject: Re: public comment onf ederal register of  
3/8/07 vol 72 #45 pg I0553

i have no access to those sites on the internet. i  
would appreciate paper copies. thank you.

b. sachau  
15 elm st  
florham park nj 07932

--- WASO\_NRSS\_Researchcoll@nps.gov wrote:

> Hi -  
>  
> Thank you for expressing your interest in this  
> collection of information.  
> You will find access to the 3 collection of  
> information forms and guidance  
> information about the permit process at the  
> following Internet address:  
>  
> <http://science.nature.nps.gov/research>  
>

> We will welcome your thoughts about these forms and  
 > the guidance documents  
 > associated with the permit process.  
 >  
 > If you want to explore the nature of the science  
 > that is conducted in parks  
 > under the authorization of Scientific Research and  
 > Collecting Permits,  
 > please browse through the Investigator's Annual  
 > Report abstracts that you  
 > can access via the Research Permit and Reporting  
 > System web site.  
 >  
 > Thanks.  
 >  
 > John Dennis  
 >  
 > John G. Dennis  
 > Deputy Chief Scientist  
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 > jean public  
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 > <jeanpublic@yahoo To:  
 > waso\_NRSS\_RESEARCHCOLL@NPS.GOV,  
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 > .com>  
 > LEONARD\_STOWE@NPS.GOV  
 >  
 >  
 > cc:  
 > BILL\_COMMINS@NPS.GOV,  
 >  
 > 03/08/2007 08:11  
 > AMERICANVOICES@MAIL.HOUSE.GOV  
 >  
 > AM PST  
 > Subject: public comment onf ederal register of  
 > 3/8/07 vol  
 > 72  
 > #45 pg l0553  
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 >  
 > doi nps application for approval to re extend  
 > collection of information on  
 >  
 > research permit  
 > application for scientific research  
 > applicatoin for science education permit  
 > investigators annual report  
 >

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>  
> can we bring truth and validity back to this  
> process?  
>  
> b. sachau  
> 15 elm st  
> florham park nj 07932

**"Fred M. Rhoades"**  
**<fredr@cc.wvu.edu>**

03/29/2007 05:26 PM MST

To: waso\_nrss\_researchcoll@nps.gov

cc:

Subject: Re: NPS solicits comments concerning Research  
Permit and Reporting System information  
collection request.

I guess you are asking for comments on the Permitting system (the note that was sent was not at all clear, nor was it really clear until I dug into the stuff at the web site).

The operative request I think: "Comments are invited on: "

"(1) The practical utility of the information being gathered"

My response: I fill in permits to allow me to teach field seminars that occur in National Parks, usually agreeing to keep species lists, and or specimens of rare species encountered. Perhaps what you ask for in the way of a permit is overkill for such applications. I would make it a bit simpler - see below.

"(2) the validity and accuracy of the reporting burden hour estimate"

My response: I usually don't spend much time on the permit application, just looking around for an old permit and copying the text from that to fill in the required spaces. Probably takes me about 1 hour per.

"(3) ways to enhance the quality, utility, and clarity of the information to be collected"

My response: Design an application form for use by field seminar teachers.

"and, (4) ways to minimize the burden to respondents, including use of automated information collection techniques or other forms of information technology."

My response: I have said the following to a number of people, both in the Park System and in the Institutes where I teach that use the Park System: One of the mandates of the National Park System is education. Many of the groups of organisms/topics I discuss in my seminars are relatively unknown to the seminar attendees and (at least for lichens and bryophytes) the attendees are extremely happy just to learn the basics and learn of the commonly occurring species in our area. It is very helpful to be able to collect small samples of common species so that students can start reference collections of their own. There should be no restrictions on collecting common species of these organisms in the Parks, other than the commonly used guidelines that all experts use (collect from litterfall, collect small amounts of material, don't collect everything, etc.). Therefore, such collection should not be prohibited, but should be encouraged in the company of an expert teacher.

In addition, I would think that a special category of permit could be designed to facilitate these uses of the Parks. I would be happy to give further details of such a category if you think this might be a good idea.

Dr. Fred Rhoades, Instructor and Research associate  
Biology Department  
Western Washington University  
Bellingham, WA 98225  
fredr@cc.wwu.edu

**DeniSeymour@aol.com**

03/28/2007 10:16 PM EDT

To: waso\_nrss\_researchcoll@nps.gov

cc:

Subject: NPS request for clearance of collection of information and the Research Permit a

I find your application and reporting procedures very simple and clear. The forms and the ability to access on line and report on line make the application and compliance process very easy.

Thank you  
Deni Seymour

**"Tim Smith"**  
**<Tim.Smith@mdc.mo.gov>**

03/28/2007 01:48 PM EST

To: <waso\_nrss\_researchcoll@nps.gov>

cc: <Leonard\_Stowe@nps.gov>

Subject: comments on OMB No. 1024-0236

I don't know if all of my comments are pertinent to the information collection issue but I will make them and let you decide.

The on-line permit request process is convenient and automatically puts researchers in touch with the appropriate NPS personnel in the affected park(s).

The policy whereby any plant collections must remain the property of NPS in perpetuity is unworkable and discourages researchers from working on NPS properties. My understanding is that plant specimens can only be



housed at herbaria that have an MOU with NPS stating that any collections from NPS properties are forever the property of NPS. Most herbaria will not agree to such terms. They routinely receive donations of specimens from field biologists because a recognized herbarium is the logical repository for specimens. There they will be protected and curated and will be forever available to researchers. I suspect that NPS is the only entity that seeks to donate specimens but maintain legal ownership of them. The U.S. Forest Service makes no such demands regarding specimen ownership; nor, to my knowledge, do any other federal landowners.

I applied for a plant collecting permit for a Missouri survey effort where some sites were on NPS property. The survey included the identification of bryophytes, many of which cannot be accurately identified in the field. Botanists typically donate specimens to herbaria where byologists identify the specimens and retain them in the collection. Because our regional herbaria did not have agreements with NPS regarding ownership of collections, we were not able to identify bryophytes from the survey site. We were not going to send them to the herbarium for identification and then ask for them back so that we could return them to the NPS office. NPS is not maintaining herbaria or offering services of identification but wants to retain ownership of all specimens. It makes no sense to send specimens to NPS when it is established herbaria where they can best be maintained and accessed.

Plant collection is a necessary part of many botanical research and survey efforts. The current NPS policy will prevent me from including NPS properties in any plant research efforts. My recommendation is to change your policy regarding ownership of plant specimens. If you feel that the plant collection will threaten the Parks' resources, then don't approve the permit. Once plants are collected, they should be housed in a recognized herbarium.

Tim E. Smith  
Botanist  
MO Dept. of Conservation  
P.O. Box 180  
Jefferson City, MO 65102-0180  
573/522-4115 ext.3200  
FAX 573/526-5582  
[Tim.Smith@mdc.mo.gov](mailto:Tim.Smith@mdc.mo.gov)

**"Bob Vadas"**  
**<vadasrlv@DFW.WA.GOV>**

05/07/2007 02:50 PM MST

To:<waso\_nrss\_researchcoll@nps.gov>  
cc: "Hal Beecher" <BEECHHAB@DFW.WA.GOV>, "Steve Boessow" <BOESSNB@DFW.WA.GOV>, "Marc Hayes" <hayesmph@DFW.WA.GOV>, "Jonathan Kohr" <kohrjkh@DFW.WA.GOV>, "Ryan Murphy" <murphrjm@DFW.WA.GOV>, <Leonard\_Stowe@nps.gov>  
Subject: Re: NPS solicits comments concerning Research Permit and ReportingSystem information collection request.

Dear John (cc Leonard);

I think the present NPS system of collection reporting is reasonable for information asked for, albeit the online-permitting system isn't very user-friendly to figure out how to submit things.

-Dr. Robert L. Vadas, Jr. (Bob)  
Washington Department of Fish and Wildlife  
Habitat Program  
600 Capitol Way N.  
Olympia, WA 98501-1091

Tel. (360) 902-2594  
Fax (360) 902 2946  
E-mail vadasrlv@dfw.wa.gov

**"George Yatskievych"**  
**<george.yatskievych@mobot.org>**

03/30/2007 10:21 AM EST

To:<WASO\_NRSS\_researchcoll@nps.gov>  
cc:<Leonard\_Stowe@nps.gov>  
Subject: NPS request for clearance of collection  
of information comments

Dear Dr. Dennis,

The request for comments on the National Park Service's Research and Permitting offers me an opportunity to comment on some aspects of the process. Please note that I am responding as an individual and that my experience involves only research on vascular plants.

To start, I would like to congratulate you on the permit application forms. The process of applying online for a permit to conduct research on various plants growing on NPS lands is reasonable, straightforward, and efficient. I have no criticisms to offer for the application process or the forms.

The approval process is another matter. As an example, I recently applied for permission to have a colleague from North Carolina harvest a very small amount of plant material for me from two related species of spring beauties (Claytonia) that are common in Great Smoky Mountains National Park for a taxonomic study. My colleague had coordinated with resource staff at the park prior to submission of the application, which at that point should have been largely a formality. I presented reasonable detail on how much plant material from how many populations we wanted to take, circumscribed the timing over a very short period, and indicated that this was a one-time, nonrecurrent event. Much to my

surprise, I received a request for yet more information from the person in charge of reviewing the application. This leads me to point out a couple of topics that should be taken into consideration during the approval process:

1) Unless the proposed research is part of a doctoral dissertation or has been submitted for major funding, such as from NSF, there will be no separate study proposal. Especially for smaller studies, this just is not standardly done by botanical investigators.

2) With most studies involving wild plants, the specifics of where the plants occur and the status of a given population during a particular growing season simply are not knowable by an investigator prior to the actual research. It is unreasonable of the evaluation process to expect more than a certain level of detail on this. It is more reasonable that the person evaluating a proposal should seek an opinion from resource staff at the park in question as to whether a particular proposed sampling or other research is reasonable to be accomplished and to be done without undue damage to the populations. Especially where investigators have already had a discussion with park resource staff, the process of permitting should be streamlined.

On another topic relating to research in the NPS system, I cannot pass up the opportunity to comment on NPS's policies concerning ownership of specimens. NPS is the only federal agency that claims ownership of specimens collected on its lands, a stance that always has seemed absurd to me. NPS should by now be able to discriminate between organisms sampled for purely scientific purposes and those sampled for potential commercial gain. The permitting process can have safeguards to protect NPS's intellectual rights if the next commercially important thermophilic bacteria is collected from a hot spring in a park without attempting to claim ownership of every biological sample collected in all parks. This regressive policy has caused many botanists no longer to work on NPS lands, which has meant a loss of potential scientific data to the parks. In my case, as the director of the Flora of Missouri Project, it has meant that I have not included NPS lands in the state in my own field studies toward the official encyclopedia of Missouri plant life, which presumably has meant that the status of some species in the Ozarks National Scenic Riverways and other properties has not been studied as well as it has been on other public lands, with a net loss to biodiversity

information at the park.

As an individual who works in one of the world's largest herbaria and one that thus far has not agreed to become an official NPS repository, I can tell you that the amount of materials and staff time that is applied to specimen processing and curation is not inconsiderable and most definitely is not underwritten financially by NPS. I am curious how NPS would feel about reclaiming a specimen if we were forced to soak it off of the herbarium paper on which we mounted it and to remove the label printed on our paper using our equipment. This sounds absurd, but it highlights the senselessness of NPS laying claim to a dried piece of plant in which the museum has so much money and time invested--without that money, time, and care by the museum the plant carcass has no value whatsoever, scientifically or economically. At least with plant specimens, it is the value added by the collector's notes and specimen preparation coupled with the museum's mounting, labeling, and curation of the sheet that creates value in the scientific collection, not the artifact itself. Also, the business of museums relating to loans of specimens and information exchange should not be made less efficient by government bureaucracy involving potential approval of specimens collected on NPS lands as part of loans. Maybe this portion of the policy is seldom enforced, but its mere existence could potentially create all manner of problems for museums. As an example, a project like Flora of North America, which is our national encyclopedia of plants and whose future funding is predicated upon timely completion of treatments by a largely volunteer workforce of contributors, should not be hindered by silliness of this sort.

Thanks for the opportunity to send these comments. I am optimistic that the permitting process by the National Park Service will continue to improve in the future. Best of luck in reviewing these policies.

GY<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

George Yatskievych, Ph.D.

Flora of <?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarts" />Missouri Project

Missouri Botanical Garden

P.O. Box 299

St. Louis, MO 63166-0299 U.S.A.  
tel. 314-577-9522/fax 314-577-0830  
e-mail [George.Yatskievych@mobot.org](mailto:George.Yatskievych@mobot.org)

**James Zimbelman**  
<[zimbelmanj@si.edu](mailto:zimbelmanj@si.edu)>

04/06/2007 04:04 PM AST

To:<WASO\_NRSS\_researchcoll@nps.gov>

cc:

Subject: Comments on NPS Collection of Information

Dear Dr. Dennis: I got your name and email from the Federal Register pages regarding public comment on the NPS procedures for the collection of information about research conducted within the national parks. I have had two active projects in two separate parks during the last two years. Personally, I have found the current system for both the request for research permits and the submission of Investigator's Annual Report to be quite effective, and a definite improvement in terms of reducing the use of paper for activities such as this. The Federal Register listing asked for comments on the following areas: 1) the practical utility of the information being gathered; 2) the validity and accuracy of the reporting burden hour estimate; 3) ways to enhance the quality, utility, and clarity of the information to be collected; and 4) ways to minimize the burden to respondents. 1) I found that the kinds of information requested for both the permit request and for the IAR to be reasonable. I must admit that I do not go looking at other reports for their information, but I am quite comfortable with anyone doing that for the projects I am involved in. I would point out that I see no easy way for the NPS to validate the information submitted, but presuming the participants treat the process with the respect it deserves, that should not pose a serious problem (except that you might not want the NPS put into the position to have to defend the specific information provided by the applicants). 2) I have absolutely no idea what a 'reporting burden hour estimate' is, but assuming it has something to do with the time required to fill in the forms, I found that a very reasonable length of time. 3) As I mentioned above, I see no way for the NPS to speak to the quality of the information provided. The validity and accuracy is necessarily dependent on honesty of the applicants themselves. Clarity might be assisted by the specificity of the topics for which information is requested; honestly, I don't see a big need for any change in the current topics. 4) This is always a good goal (particularly from my perspective as a respondent), but once again I can't think of a specific suggestion that would significantly improve the current system.

Dr. James Zimbelman, Geologist, Center for Earth and Planetary Studies, National Air and Space Museum, Smithsonian Institution, Washington, DC.

Of the 26 comments received from NPS personnel, one observed that the information is vital to park science management and the collection of information should be renewed, whereas ten other commenters addressed specific details of a variety of topics, such as what

information the Investigator's Annual Report should or should not request, how to validate that a non-NPS repository meets professional museum standards, adding a specific question to the application regarding ground disturbance, challenging the rigidity of the NPS collections policy, changing NPS policies regarding treatment of NPS staff projects, whether or not there is need for provision by the permittee of field notes and other materials to the park issuing the permit, and adding some search functions to the software. Of the 15 NPS commenters who specifically addressed the science education application, several saw the value in the process, including one who specifically saw the need and stated that the form meets the need. Others were concerned about too much red tape, too much detail being requested, too burdensome a process, an increased likelihood that improvised education opportunities would be eliminated, and one who suggested that the separate form is not necessary and that, instead, the research application form could be modified to include the education component. Several of the comments suggested changes to the application form, either by adding questions, clarifying questions, or deleting questions. Many of the comments suggested information to include in guidance materials about the science education permit.

NPS experience with using the Internet-based system over the past six years has yielded few complaints, has earned a number of kudos, and has not yielded any comments on the PRA statement associated with the forms, or any comments on the cost and hour burden estimates. This use also has yielded a variety of suggestions from both respondents and government employees for making the software more efficient or more usable. Many of these suggestions have been considered and some have led to appropriate modifications being incorporated either as ongoing software improvements, through release of a second version of the software in December 2003, or through the changes to the collection of information forms that were adopted during the 2004 renewal request. Such receipt of, and action on, user suggestions constitutes ongoing consultation with those people from whom information is being collected and by whom the collected information is being applied. Should OMB approve the collection of information forms submitted with this supporting statement, additional software changes will be made to improve the electronic coordination of these forms.

In response to these review comments, NPS proposes no changes in the three collections of information forms. NPS does propose to develop better guidance, as appropriate, for use of all three forms.

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

Not applicable. No payments or gifts are provided to respondents. Once issued a permit, permittees may receive logistic and other assistance from parks that issue them permits on a project by project basis, subject to availability of such support in the park.

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

Not applicable. No confidential information is solicited.

**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.**

Not applicable. No sensitive questions are 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 in Item 13 of OMB Form 83-I.**
- \* 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 in Item 14.**

We found during the past six years that NPS received and processed per year an average of between 2,500 and 3,500 park Scientific Research and Collecting Permit applications from about 2,500 to 3,500 respondents. A respondent completes an application whenever the respondent wishes to conduct a scientific study or science education activity in a park. As a condition in each permit, the permittee must submit an Investigator's Annual Report each year the permittee holds a valid permit, and in addition, is expected to submit copies of reports and other materials as identified in any unique conditions contained in the permit.

An applicant who successfully obtains a permit, in most cases, will submit two responses per year. The two responses consist of the application and the Investigator's Annual Report. The estimated average total number of annual responses received from approximately 3,000 respondents per year during the past six years is 6,000 responses (or approximately 3,000 applications and up to approximately 3,000 annual reports).

At the time we requested renewal of this collection of information in 2004, we made three significant changes and a number of minor changes to the collection of information forms based on our experience with using the existing forms for the first three years. First of all, we

created a simpler, separately named application form for use by those applicants who seek to conduct a science education activity in the park. Secondly, we streamlined the Investigator's Annual Report form by having the park research permit coordinator identify the proper subject/discipline term for a project at the time the permit is prepared, rather than asking the permittee to make this designation as part of preparing the Investigator's Annual Report. In addition, we added clarifying information to the portion of the application that requests information relating to obtaining approval from non-NPS repositories proposed by the applicant to receive specimens on loan from NPS. Furthermore, we made other, smaller changes in both the application and the Investigator's Annual Report forms to clarify information collection entries that applicants or park personnel had identified to be ambiguous, confusing, or non-informative. We were able to implement the revised Application for a Scientific Research and Collecting Permit and Investigator's Annual Report forms in the Internet system during the past three years, but have not yet been able to prepare the software to implement the new Application for a Science Education Permit.

Although we believe these changes to the collection of information forms on average will reduce the hour burden imposed on respondents, we have retained for this renewal request our original estimate of the collection of information hour burden per respondent. This estimate includes three components. One is that it will take a maximum of 45 minutes for a respondent using the automated application form to read the guidance material for the research permit application, complete an application, electronically attach a copy of the applicant's proposal (if any) which sets forth the objectives and methods to be used to conduct a research project (it is standard practice for scientists to develop research proposals as a fund-requesting mechanism for the research they seek to conduct), and electronically submit the application package to NPS. The second component is that it will take 15 minutes for the successful applicant to review the permit conditions attached to the permit issued to the applicant, sign the permit, and return the signed permit by mail or fax to the park for the park manager's signature. The third component is that it will take a maximum of 15 minutes for a respondent to complete the automated Investigator's Annual Report (it is standard scientific operating practice for investigators to prepare draft and final reports to that document for the scientific work conducted). We have estimated that approximately the same times will be required for responding to the collections of information regarding the Science Education Permit, recognizing that this application process may involve attaching a proposal that contains a syllabus and desired outcome for a science education activity, rather than a research proposal.

In addition to submitting completed collection of information responses, some respondents may have to mail or fax copies of documents that are not available electronically, such as permits received from other agencies, or copies of scientific papers published in scientific journals. We estimate that copying and sending such documents will involve approximately 1,500 respondents and take each of them no more than 15 minutes per year to complete.

We estimate that no more than half of the research permit requests will involve an intent to make permanent collections that will require coordination with one or more non-NPS museums and possibly other repositories. We estimate that it will take a respondent a maximum of 30 minutes to complete and obtain an appropriate signature on the portion of the application form that deals with specimens that are to be retained permanently. We prohibit science education



permittees from making permanent collections, so no applicants for this permit will have to spend time coordinating with a non-NPS repository.

In 2004, we identified a total annual burden of 4,875 hours (or 2,250 hours for completing applications, 750 hours for returning signed permits to issuing parks, 750 hours for obtaining specimen repository information, 750 hours for submitting annual reports, and 375 hours for providing non-automated information).

By 2007, we have observed a gradual increase in total number of permitted activities from the original estimate of 3,000 to averages for the years 2004 and 2005 of 4,472 studies under permit and 3,657 Investigator's Annual Reports submitted. Based on the growth in use of the Internet system experienced to date, we estimate that by the year 2010, the system will be dealing with about 6,500 respondents per year who will submit an estimated 13,000 responses per year. Although we believe the burden per respondent for dealing with the Science Education Permit process will be somewhat less than the burden per respondent for dealing with the research permit process, we have used the same average annual burden for the two collections of information processes to estimate the total annual reporting burden. Using 1.625 hours per year per respondent and 6,500 respondents, we estimate the average annual reporting burden by the year 2010 will rise to 10,563 hours. As a result, we are requesting in this renewal an adjustment of 5,688 hours from the current 4,875 hours to the projected 10,563 hours.

The probable pool of respondents applying for a Scientific Research and Collecting Permit will include all ranks of academics from graduate students, full-time professors, and the full range of government and non-government researchers from entry level to senior scientist. The probable pool of respondents applying for a Science Education Permit will include all ranks of academics from graduate students, full-time professors, and the full range of public and private school teachers from kindergarten through high school. A mid-range salary of \$70,000 per year would yield an hourly rate of about \$34.00. At \$34.00 per hour, the total annual cost for all respondents to apply for and report on the results of permitted Scientific Research and Collecting or Science Education conducted in parks is estimated to be \$359,142. This estimate includes the time needed for conducting the typing, photocopying, filing, mailing, and other standard office activities associated with requesting the permit and complying with permit conditions. Therefore, the annual burden estimate is summarized as follows:

$$10,563 \text{ hours} \times \$34/\text{hour} = \$359,142$$

**13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

- \* 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.

Not applicable. There are no non-hour costs.

**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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The total annual cost to the Federal Government for processing 6,500 Scientific Research and Collecting Permit applications, Science Education Permit Applications, and resulting permits, reports, specimens, and associated documentation, is estimated to be \$13,460,000. This estimate is based on a direct software management cost of \$200,000, and an average hourly cost of \$30 per hour for a GS-11 or GS-12 park resource specialist, to review and process application materials, annual reports, specimen accession and catalog documentation, loan agreements, conduct environmental reviews and field inspections as needed, and perform necessary typing, data entry, photocopying, record-keeping, mailing, and other standard office activities. Given that some research projects and most science education activities will require very little review by only a small number of park staff, while other, primarily research, projects will require a larger number of park staff to conduct an extensive review, prepare an environmental assessment, and curate specimens, the time estimates provided here are approximately \$1200 (or 5 person days) for processing each application, \$720 (or 3 person days) for monitoring the work being conducted under the permit, and \$120 (or 0.5 person days) for reviewing and handling Investigator's Annual Reports and other reports produced by each permittee. This estimate does not include long term, post permit costs associated with the ongoing management and storage of specimens, associated records, and, where applicable, loans of specimens that are generated by those permitted scientific research and collecting studies that involve collection of specimens for permanent retention.

Processing activities include 1) responding to any park specific questions that prospective applicants may have regarding the permitting process, 2) providing application forms and instructions to those few applicants who are unable to access the Internet and entering information from their paper copy submissions into the Research Permit and Reporting System, 3) reviewing applications for conformance with permit requirements and park protection standards, 4) providing collection management guidance and requirements to applicants proposing to collect specimens for permanent retention, 5) preparing permits and determining appropriate terms and conditions for permits, 6) notifying permit applicants of the park's decision to issue or deny requested permits, and 7) conferring with managers of proposed repositories of permanently retained collections.

Monitoring includes 1) inspecting research or science education field sites for conformance to the terms and conditions of permits, 2) reviewing reports submitted by permittees and, for those few respondents who are unable to access the Internet, entering annual report information into the Research Permit and Reporting System database, and 3) preparing loan documentation and tracking of specimens and associated records to ensure they are deposited in the repositories named in the permits, and 4) initial tracking of the status of specimens by checking catalog data, uploading catalog records into the NPS database, checking labeling, preparation, and storage techniques, and processing associated records.

Reviewing and handling reports includes 1) ensuring that Investigator's Annual Reports are collected; 2) checking an Investigator Annual Reports, which consists of reading the report and determining its status (sensitive or non-sensitive) 3) distributing Investigator's Annual Reports and other reports to interested park interpretation, resource management, planning, and other staff; and 3) updating park permit files. The annual cost to the Federal Government is summarized as follows:

Average total salary days per application:  $5 + 3 + 0.5 = 8.5$  person days  
Average total salary per application:  $\$1,200 + 720 + 120 = \$2,040$  per application  
Average annual cost of direct software management: \$200,000  
 $\$30/\text{hour} \times 8.5 \text{ person days} \times 8 \text{ hours/day} \times 6,500 \text{ respondents} = \$13,260,000$

Therefore, the annual cost to the Federal Government is \$13,460,000

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

By 2007, we have observed a gradual increase in total number of permitted activities from the original estimate of 3,000 to averages for the years 2004 and 2005 of 4,472 studies under permit and 3,657 Investigator's Annual Reports submitted. Based on the growth in use of the Internet system experienced to date, we estimate that by the year 2010, the system will be dealing with about 6,500 respondents per year who will submit an estimated 13,000 responses per year. Although we believe the burden per respondent for dealing with the Science Education Permit process will be somewhat less than the burden per respondent for dealing with the Research Permit process, we have used the same average annual burden for the two collections of information processes to estimate the total annual reporting burden. Using 1.625 hours per year per respondent and 6,500 respondents, we estimate the average annual reporting

burden by the year 2010 will rise to 10,560 hours. As a result, we are requesting in this renewal an adjustment upward of 5,688 hours from the current 4,875 hours to the projected 10,563 hours.

**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.**

Not applicable.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Not applicable.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

Not applicable.