

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION
AUTHORIZING GRAZING USE (43 CFR 4110 and 4130)
FORMS 4130-1, 4130-1A, 4130-1B, 4130-3A, 4130-4 AND 4130-5
OMB CONTROL NUMBER 1004-0041**

SECTION A

JUSTIFICATION

1. Explain why you need to conduct the information collection. Identify any legal or administrative requirements that necessitate the collection. Include a description of any statute or executive order that requires the collection, and attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection. Provide some background information on the program and describe how the collection supports it. Detail any specific program problems you hope to resolve.

The Taylor Grazing Act of 1934 (43 U.S.C. 315) and the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 and 1751-1753) authorize the Bureau of Land Management (BLM) to administer the livestock grazing program consistent with land use plans, multiple use objectives, sustained yield, environmental values, economic considerations, and other factors. Maintaining accurate records of permittee and lessee qualifications for a grazing permit or lease, base property used in conjunction with public lands, and the actual use made by livestock authorized to graze on the public lands, is an important and integral part of the program administration and grazing management. The regulations at 43 CFR 4110.1 and 43 CFR 4110.2 require from the public an application and notice to the BLM to transfer grazing preference and to apply for a permit or lease in conjunction with a preference transfer. The regulations at 43 CFR 4130.1 require existing permittees and lessees to apply to the BLM for changes in their authorized grazing. The regulations at 43 CFR 4130.3-2(d) allow the BLM to require permittees or lessees operating under a grazing permit or lease to submit an actual grazing use report within 15 days after completing their annual grazing use, or as otherwise specified in the permit or lease. The regulations at 43 CFR 4130.6-1 allow the BLM to enter into “exchange-of-use” agreements with applicants who own or control lands that are unfenced and intermingled with public lands within an allotment. The BLM requires applicants, permittees, and lessees to submit the required information on Forms 4130-1, 4130-1a, 4130-1b, 4130-3a, 4130-4, and 4130-5.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. For all but “New” collection requests, indicate the actual use the BLM has made of the information received. Do not just make general statements about the overall use of the information, but address the specific items of information being collected.

The BLM uses the information on Forms 4130-1, 4130-1a, and 4130-1b to allocate grazing use, adjudicate conflicting requests for grazing use, determine legal qualifications of applicants, issue permits, and document transfers. The BLM requires a permit or lease to authorize livestock to

graze on public lands. We request the following information:

- a. Applicant's name and address;
- b. Location of grazing use requested (allotment name, number, and pasture number);
- c. Description of requested use (number of livestock; kind; and period of time); and
- d. Identification markings of livestock that will be grazing under the permit or lease.

The BLM uses Form 4130-1a to verify and confirm information we need to effectuate a grazing preference transfer. We request the following information on Form 4130-1a:

- a. Applicant's name and address;
- b. Description of the private lands or water offered as base property used in conjunction with the grazing permit or lease;
- c. The amount of public land permitted for grazing use, expressed in animal unit months (AUM's) and location of use, identified by allotment and associated with the offered base property; and
- d. If the application transfers preference for permitted use from another base property to the applicant's base property, a description of the base property from which the preference for permitted use is detached and concurrence with this action by the original base property owner as well as any lienholder.

The BLM uses Form 4130-1b in conjunction with Form 4130-1a to enable applicants to certify that they are qualified for a grazing permit or lease and to provide other information necessary to the administration of the grazing permit or lease. We request the following information on Form 4130-1b:

- a. Applicant's name and address;
- b. Whether the applicant is a U.S. citizen or has petitioned for citizenship, a group or association, or a corporation;
- c. Whether the applicant has a satisfactory performance record as required under 43 CFR 4110.1(b);
- d. Identification of the party or parties that will own the livestock that will graze under the permit or lease;
- e. The date that a livestock control agreement, if required, will be submitted to the BLM by the applicant;
- f. The brands and other identifying markings of the livestock that will graze under the permit or lease;
- g. A listing of land owned or leased by the applicant that is within BLM grazing allotments;
- h. Disclosure of grazing authorizations issued by other BLM offices and other Federal, state, or local agencies; and
- i. The identity and contact information of the person, if any, who the applicant has authorized to represent them to the BLM.

The BLM uses the information on Form 4130-3a to approve changes of grazing use within the terms and conditions of permits or leases. The BLM requires a permit or lease to authorize

livestock to graze on public lands. The BLM uses permit/lease and permittee/lessee information collected at the time we issue the permit or lease to complete some of the information on these forms. We request that the permittee/lessee review the following information provided on the form:

- a. Permittee's name and address;
- b. Name and number of permitted grazing allotment(s);
- c. Number of livestock authorized;
- d. Period(s) of grazing use authorized; and
- e. Other terms and conditions of grazing use necessary for management.

The BLM provides Form 4130-3a annually or more often to the permittee/lessee. The permittee/lessee must submit the completed form to the BLM 30 to 60 days before the permitted date to begin grazing. The permittee/lessee then has the option of editing the pre-completed form to reflect any desired changes in grazing use and return the form to the BLM. If the form is returned with changes, we use the information to determine:

- a. Whether the level of grazing use the permittee/lessee requests will be consistent with the terms and conditions of their permit or lease;
- b. Whether the change(s) the permittee/lessee requests will be consistent with multiple use objectives stated in the applicable land use plan; and
- c. Whether the changes requested otherwise comport with the requirements of the grazing regulations.

The BLM reviews the edited form and if the changes are acceptable to us, we will approve the changes and assess grazing fees accordingly.

The BLM uses the information on Form 4130-4 to allow applicants who own or control unfenced and intermingled non-federal lands within BLM-designated grazing allotments to apply for grazing use on Federal lands to the extent of the grazing capacity of the non-federal lands. Upon approval of an "exchange-use-agreement," the applicant is authorized to make use of Federal lands to the extent of the grazing capacity of the non-federal lands offered, and in exchange, the non-federal landowner agrees that the Federal permittee may graze on the non-federal lands to the same extent. This arrangement addresses mixed land ownerships within allotments and recognizes that livestock will roam across unfenced lands in the course of grazing regardless of land ownership. No fees for livestock forage are charged by either party to an exchange-of-use agreement. If non-federal lands offered in exchange are leased, the term of the agreement may not exceed the term of the lease. The BLM requests the following information on Form 4130-4:

- a. The applicant's name and address;
- b. A legal land description of the land being offered for exchange of use;
- c. The applicant's estimate of the grazing capacity of the land being offered in exchange of use, rated by the kind of livestock for which grazing is desired;
- d. The name of the allotment and the administering BLM field office where the lands are

located; and

- e. The terms and conditions of grazing use requested (livestock number, kind, and period of use) and the estimated forage consumption in animal unit months (AUMs) that would result from such use.

By policy, the BLM generally limits the term of exchange-of-use agreements to five years before it is renegotiated. This recognizes that forage production on rangelands is dynamic and subject to change over time. Following completion of the application, the BLM verifies that it is accurate and that the grazing use desired will be in harmony with the management objectives for the allotment and will be compatible with existing livestock operations. If this is the case, the BLM then issues an exchange-of-use grazing authorization to the applicant, or, if the applicant is also a Federal permittee within the allotment, ensures that the terms of the agreement are incorporated into the Federal grazing permit or lease.

The BLM uses the information on Form 4130-5 for two specific purposes:

- a. To calculate billings (payment due to the Government for the amount of authorized livestock grazing use). The BLM issues a billing notice when fees are due, and must receive payment in full prior before authorizing grazing use, except when an allotment management plan provides for delayed payment and is incorporated into a grazing permit or lease. In this latter situation, the BLM issues a billing notice based upon actual grazing use at the end of the grazing period/year or for a normal operation prior to the grazing period/year followed by an adjusted billing notice based upon the actual use reported after the completed grazing use (43 CFR 4130.8-1(e)). If the BLM fails to collect this information, it will prevent us from managing the program properly.
- a. As a base-line for monitoring and evaluating livestock grazing use on the public lands to determine if we need to adjust the amount of grazing use or if other management actions are having the desired effects. Knowledge of actual livestock use is essential for monitoring and evaluating the livestock grazing management program. Information on the specific use is essential for an accurate and complete analysis and evaluation of the effects of livestock grazing during particular periods of time, considered with other factors such as the climate, growth characteristics of the vegetation, and utilization levels on the plants. Failure to collect this information would result in less than satisfactory data and reduce our capability to make or require adjustments.

The BLM provides Form 4130-5 to permittees or lessees before we authorize the livestock to graze for one grazing period/year. This enables the permittee or lessee to complete the form as the use is made. This is necessary for the BLM to maintain a uniform and accurate billing process.

Since the BLM uses the information supplied by the reports for billing purposes, the permittee or lessee must keep accurate and current records for the period of time covered by their permit or lease.

Form 4130-5 requires the following entries:

Allotment and Pasture. Permits and leases authorize livestock use in specified areas (e.g., allotments and/or pastures). This entry identifies where livestock grazing use occurred.

Date. This entry identifies the day a change was made. The BLM uses this information to calculate total time grazed for billing purposes. This is key information along with the other entries to identify a specific event.

Number and Kind of Livestock. This entry requires the identification of the numbers of livestock allowed to graze. Information on the kind of livestock is important for billing purposes (e.g., the fee for five sheep is equivalent to the fee for one cow). It is also important for the monitoring and evaluation program, since different kinds of livestock have different forage (vegetation) preferences and effects on the vegetation and other resources.

Remarks (Reverse Side). This enables the permittee or lessee to provide information they believe should be important to the BLM. For example, the permittee may believe that unusual circumstances occurred during the reporting period, such as abnormally dry weather or the presence of poisonous plants which may cause livestock death losses. The BLM considers this information in its monitoring and evaluation program.

Signature. The permittee or lessee certifies completeness and accuracy when signing the report. The permittees or lessees are prohibited from knowingly or willfully making false statements in actual use reports (43 CFR 4140.1 (b)(8)).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological 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 you gave to the use of improved information technology to reduce the burden on the public.

In accordance with the Government Paperwork Elimination Act (GPEA), the public can fill out and download forms. They cannot submit the forms to BLM electronically at this time. However, the BLM will implement a user name password authentication process for E-Forms, pending implementation of HSPD-12. We enrolled and trained users in Oregon, Wyoming, Arizona, Montana, Nevada, and Utah in limited use of the Property and Sign program areas. We will continue training on the use of E-Forms in FY 2008. In FY 2008, we will identify super users as we expand the use of E-Forms into other program areas beyond the Property and Sign program. The Department will schedule full implementation of HSPD-12 in FY 2008. This implementation will provide an easier enrollment and use process for E-Forms with a Level 4 strong multifactor authentication token. In FY 2008, the BLM will fully implement E-Forms using the Smart Card across all program areas to provide organizational maturity of the use and understanding to both program and technical staff. After full implementation and training in use of the E-Forms across all program areas for internal uses, the BLM will prepare to respond and provide service to the public for E-Forms signed and delivered via the Internet. We project

public use to be in place by FY 2009.

When the BLM has completed the process, these forms will be electronically available to the public on the BLM's Forms website (<http://www.nc.blm.gov/blmforms/index.html>). The information documented on these forms will be recorded as use occurs. There is no other way to collect it in an accurate manner and no known opportunity to reduce the burden. The BLM makes these forms available through electronic media for those ranchers who wish to maintain the records on their computer and to file completed forms by e-mail. Discussions with ranchers indicate, however, that those who have the capability believe that obtaining the forms from the internet is desirable but they prefer to file the forms manually. The BLM requires and encourages consultation, coordination and communication with ranchers and others regarding grazing administration matters. Experience shows that most ranchers prefer to visit the BLM field office where a Rangeland Management Specialist can assist them and discuss any questions or problems they may have.

Under the Government Paperwork Elimination Act (GPEA), the BLM will continue the electronic process to make these forms PDF fillable during this approval period. After the BLM issues the permit or lease, then a computer-generated (electronic) version of Form 4130-3a from the Rangeland Automation System (RAS) will be completed with previously collected information. The public cannot therefore download a blank copy of Form 4130-3a directly from the BLM's Forms Central website since the form is generated from the RAS.

4. Describe your efforts to identify duplication with other collections which may be gathering the same or similar information. If the same or similar information is available, describe why it cannot be used or modified for the purposes described in "2" above.

The information we request is unique to the ranchers (the actual grazing users) and no other source is available. The BLM must obtain this information in order to monitor and evaluate the program and to facilitate billing for grazing use of public lands. There is no similar information already available and no duplication of information collection.

5. If the collection will have a significant impact on small entities such as small businesses, organizations, or government bodies, describe the methods used to minimize the burden on them.

Small organizations are among the potential respondents. The BLM reviews the requirements to ensure that the information we request of small organizations and all other potential respondents is the minimum necessary. There are no special provisions for small organizations. We structure the request to enter only necessary data. Collection of the information will not have a significant impact on small businesses.

6. Describe the consequence to the 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 the burden.

If the BLM fails to conduct the information collection, we would not have current information necessary for billing to meet statutory financial responsibilities, or for evaluating, and monitoring the program. Each entry is a one-time item and recorded for each event. The permittee or lessee submits the information as provided on each form.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the OMB guidelines.

There are no special circumstances requiring the collection to be conducted in a manner inconsistent with OMB guidelines under 5 CFR 1320.5.

8. Provide a copy of the 60-day Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to the notice and describe the actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

The required 60-day notice was published in the **Federal Register** on May 8, 2007 (72 FR 26149) and the comment period closed on July 9, 2007. The BLM received no comments. A copy of the notice is attached.

Describe your efforts to consult with persons outside the agency to obtain their views on the availability of data, the frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation should include obtaining their views on the amount of burden to be imposed, and ways to minimize the burden. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years, even if the collection has not changed. If circumstances prevent this consultation, describe them, but please note that OMB is emphasizing the need for such consultations.

During the 3-year approval period, we consulted with several respondents (permittees and lessees) throughout the western states to obtain their views on the forms. Our estimates in item 12 in this document are based on BLM experience and the consultations with the following respondents:

| Name | Affiliation | Phone Number |
|--------------------|--------------------------------|--------------|
| Carolyn B. Shelley | Public Lands Grazing Permittee | 435-467-4564 |
| Timothy D. Keller | Public Lands Grazing Permittee | 208-698-3456 |
| Hal Hamblin | Public Lands Grazing Permittee | 435-644-5627 |
| Mike Doverspike | Doverspike LLC | 541-573-7577 |
| Chris Majors | Majors LLC | 970-565-9521 |
| John Barnham | Public Lands Grazing Permittee | 530-260-0096 |
| Walt Liberski | Vaughn and Hull, Ltd. | 775-738-4031 |

Discussions with ranchers indicate that most ranchers prefer to visit the BLM field office where a Rangeland Management Specialist can assist and discuss any questions or problems they may have.

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

We provide no payments or gifts to the respondents.

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

We protect the respondent's confidentiality to the extent consistent with the Freedom of Information Act (5 U.S.C. 442).

Under the privacy provisions of the E-Government Act of 2002, individuals/respondents were informed as to whether or not providing the information is mandatory to obtain a benefit. The BLM has firewalls to protect website access, strong security and password protection of the information in the data base, and other security measures to protect electronic information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private. The justification should include the reason why the questions are necessary, the specific uses for the information, the explanation to be given to the respondents, and any steps taken to obtain their consent.

We do not require the respondents to answer questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information. If this submission is a revision to an approved collection, and describes only the revised requirements, this answer should just reflect the new burden for that requirement and how much this is increased/decreased from the previous burden (if any) for the requirement. The statement must:

- **Provide the number of respondents expected annually, frequency of their response, the total number of responses expected, the average response time per respondent, and the total annual response time (in hours) for the collection. Response time includes not only the time necessary to complete the form or answer the questions, but also the time needed to gather the information (unless it was already being gathered for other purposes), have it reviewed by lawyers or accountants, etc. Explain how you arrived at these estimates.**
- **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, estimated should not include burden hours for customary and usual business practices.

- If this request for approval covers more than one form, provide burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-1.
- Provide estimates of annualized cost to respondents for the hour burden for the collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection should not be included here (see Item 14 below).

The below estimates are based on data maintained in the BLM's Rangeland Administration System (RAS) - an automated system that records, tracks and generating BLM grazing authorizations and BLM grazing fee billings - for the period 2004 through 2007:

Table 12 – Burden Hour Costs of the Collection

| Form* | Annual Responses X | Average Response Time (hour fraction) = | Annual Burden Hours X | Respondent Cost / Hour ** (\$) X | Benefits Multiplier*** = | Annual Cost (\$) (rounded to the dollar) |
|-----------------------|-----------------------|--|--------------------------|--|-----------------------------|---|
| 4130-1 | 3000 | ¼ | 750 | \$18.92 | 1.4 | \$19,866 |
| 4130-1a | 1050 | ½ | 525 | \$18.92 | 1.4 | \$13,906 |
| 4130-1b | 1050 | ½ | 525 | \$18.92 | 1.4 | \$13,906 |
| Non-form requirements | 1050 | 1/6 | 175 | \$18.92 | 1.4 | \$4,635 |
| 4130-3a | 7690 | ¼ | 1,922.5 | \$18.92 | 1.4 | \$50,923 |
| 4130-4 | 10 | ¼ | 2.5 | \$18.92 | 1.4 | \$66 |
| 4130-5 | 15,000 | ¼ | 3,750 | \$18.92 | 1.4 | \$99,330 |
| Totals | 28,850 | ----- | 7,650 | ----- | ----- | \$202,632 |

* The form column of this table also contains information for the non-form information requirements applicable to forms 4130-1a and 4130-1b for this information collection. The BLM requires that applicants for a preference and a grazing permit provide the BLM with copies of items that the BLM uses to document the applicants' qualifications, such as copies of deeds or leases demonstrating control of base property, brand certificates demonstrating brand ownership, livestock control agreements, and notices of lienholder interest in base property. We estimate that the non-form requirements would take an applicant about 10 minutes to complete. While we count these as separate actions or responses within this collection, these non-form requirements (considered supporting documentation) are completed and submitted along with Forms 4130-1, 4130-1a, 4130-1b, and 4120-8 (Assignment of Range Improvements) as a package to the BLM.

** Respondent cost per hour is based on the mean hourly earnings of non-metropolitan workers in the "natural resources, construction and maintenance" fields found in Table 22 of the *National Compensation Survey: Occupational Wages in the Mountain Census Division, June, 2006*, published by the Bureau of Labor Statistics

(BLS) in September, 2007. Determining occupational wages for ranchers is problematic. The Technical Note to the previously cited publication notes that the agricultural sector is not within the scope of their survey and no other similar survey seems to be available. However, an agricultural economics article presented at the Western Economics Forum in 2005 entitled “Who are the Public Land Ranchers and Why Are They Out There?,” (see <http://ageconsearch.umn.edu/bitstream/123456789/7506/1/04020014.pdf>) estimated that the net 2002 income of a public lands full time family rancher who derived approximately 75% to 85% of their income from the ranch had a net annual income of about \$43,000 to \$47,000, citing: *Gentner, B. and J.A.Tanaka. 2002. Classifying Federal Public Land Grazing Permittees. Journal of Range Management 55(1): 2-11.* A rancher workweek typically exceeds 40 hours, thus, the “respondent cost per hour” used above may be a slightly high estimate.

** We used a benefits multiplier of 1.4 based on the ratio between the wages and benefits for this occupational category within the private sector as shown in Table 13 in the U.S. Bureau of Labor Statistics: **EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—SEPTEMBER 2007** , to determine the hourly rate.

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the information collection. Do not include the cost of the burden hours described in Items 12 and 14.

The respondents incur a \$10 service charge for processing a grazing preference transfer, which includes submission, as a single package, of forms 4130-1, 4130-1a and 4130-1b. Respondents also incur a \$10 service charge that results in modifying or cancelling and replacing a previously issued grazing fee billing. The form to be filed for that action is 4130-1. Based on those premises, the respondent’s cost burden would be:

| | |
|--|------------------------|
| Forms 4130-1, 4130-1a, 4130-1b filed as part of transfer application: | 1050 x \$10 = \$10,500 |
| Form 4130-1 filed independent of a transfer application (3000 – 1050 = 1950) : | 1950 x \$10 = \$19,500 |
| | Total: \$30,000 |

The BLM grazing regulations were modified in 2006 to increase the service charge for transfers to \$145 and for canceling or replacing a previously issued grazing fee bill to \$50, among other things. However, the 2006 BLM rulemaking that changed these regulations were enjoined “in all respects” by the Idaho Federal District Court (for reasons other than the changes to the service charge schedule) in June, 2007. A final judgment by the Court affirming this injunction was entered on February 28, 2008, and it is now subject to appeal.

Respondents maintain grazing information in the course of conducting usual and customary ranch business. Respondents need not purchase any new computer hardware or software specifically related to electronic submission of these forms.

14. Provide estimates of annualized cost to the Federal Government.

The annual cost burden to the Federal Government is based on the BLM’s experience with the information collection. This cost burden includes the cost incurred by the BLM from the receiving point of the respondent’s application or report to the issuance/approval of the land use

authorization, reconciliation billing, or recording and analyzing the report. This includes the time for clerical staffs to receive the application or report, route it to appropriate technical staff for processing, managerial staff to review and approve the authorization and technical and clerical staff to issue the subsequent land use authorization.

Table 14 – Information Processing Costs*

| (a) Form | (b) Clerical Wage x 1.5 | (c) Time | (d) Cost per resp. (\$) | (e) Technica l Wage x 1.5 | (f) Time | (g) Cost per resp. (\$) | (h) Manageria l Wage x 1.5** | (i) Time | (j) Cost per resp. (\$) | (k) Aggr. Cost per resp. (\$) [(d)+(g)+(j)] X | (l) No. Resp. (from Q. 12) = | (m) Total Cost (\$) |
|-----------------------------------|----------------------------------|-------------|-------------------------------------|------------------------------------|-------------|-------------------------------------|---------------------------------------|-------------|-------------------------------------|---|---|------------------------------|
| 4130-1 | 23.38 | 5 min. | 1.94 | 34.60 | 30 min. | 17.30 | 49.32 | 5 min. | 4.09 | 23.33 | 3000 | 69990 |
| 4130-1a | 23.38 | 5 min. | 1.94 | 34.60 | 1 hour | 34.60 | 49.32 | 10 min. | 8.18 | 44.72 | 1050 | 46956 |
| 4130-1b | 23.38 | 5 min. | 1.94 | 34.60 | 1 hour. | 34.60 | 49.32 | 5 min. | 4.09 | 40.63 | 1050 | 42662 |
| Non-form requirements * | ----- | ----- | ----- | 34.60 | 10 min. | 5.77 | ----- | - | ----- | 5.77 | 1050 | 6059 |
| 4130-3a | 23.38 | 5 min. | 1.94 | 34.60 | 30 min. | 17.30 | 49.32 | 5 min. | 4.09 | 23.33 | 7690 | 179407 |
| 4130-4 | 23.38 | 5 min. | 1.94 | 34.60 | 1 hour | 34.60 | 49.32 | 10 min. | 8.18 | 44.72 | 10 | 447 |
| 4130-5 | 23.38 | 5 min. | 1.94 | 34.60 | 1 hour | 34.60 | 49.32 | 5 min. | 4.09 | 23.33 | 15000 | 349950 |
| Aggregate total cost for all IC's | | | | | | | | | | | | 695,471 |

All wage rates derived from "Salary Table 2008-GS" effective January 2008 published by the Office of Personnel Management. "Clerical Wage" = GS-7/1; "Technical Wage" = GS 11/1; "Managerial Wage" = GS 13/1; As portrayed, a "benefits multiplier" of 1.5 was applied.

* At best, these are estimates. Many complications can arise in processing public land grazing administrative matters because the authorizations applied for affect dynamic living ecosystems and often are not without controversy.

** This multiplier was derived from the ratio between wages and benefits for state and local government workers in the U.S. Bureau of Labor Statistics: **EMPLOYER COSTS FOR EMPLOYEE COMPENSATION—SEPTEMBER 2007 (news release)**. Currently, the Bureau of Labor Statistics does not provide such a ratio for Federal workers, but in order to estimate Federal government worker costs for this collection we assumed that the ratio would be the same for Federal workers.

***The time it takes a Federal Government technical worker to process the non-form information requirements (supporting documents) can vary widely, but we estimated that it would take this type of worker on average 10 minutes each year to process this type information as described in Question 12. The BLM administers 18,000 grazing permits and leases, so even accounting for some of the more extreme cases, we feel that 10 minutes is still a reasonable estimate for processing non-form information related to this collection. For example, if the base property offered on a lease for example is a simple half section, then it is straight-forward and does not take long to process. If the base property entails complicated legal descriptions of many lines, then it takes longer. In some cases, a Federal Government technical worker may spend several hours consulting County courthouse records on more complicated transfers. This can be further complicated when the applicant has a deed for several thousands of acres of property, all written in legal land descriptions, but the base property offered is only a fraction of that. A technical worker might also need to spend at least an hour reviewing the deed to ensure that in fact the base property associated with the grazing preference is listed on the deed in that instance. .

The total estimated annual cost to the Federal Government is \$ 695,471.

15. Explain reasons for changes in burden, including the need for increase.

| Burden | Previous Collection | This Collection | Change |
|---------------------|---------------------|-----------------|------------|
| Responses | 41,289 | 28,850 | -12,439 |
| Burden Hours | 13,244 | 7,650 | -5,594 |
| Annual Burden Hour* | \$264,880 | \$202,632 | - \$62,248 |

| | | | |
|--|-----|----------|-----------|
| Cost (to Respondents) | | | |
| Annual Non-Burden Hour Cost (to Respondents) | \$0 | \$30,000 | +\$30,000 |

The BLM estimates fewer responses and well as fewer respondent burden hours than in the previous collection because we were able to produce more accurate estimates of annual responses and more accurate estimates of respondents hourly costs than before.. This change represents a change or adjustment in our program estimate.

*The BLM estimates a lower annual burden hour cost to respondents for this collection based on our use of relevant occupational wage and benefit data from the Bureau of Labor Statistics. In the previous collection we had estimated that the cost per hour to the respondent was \$20 regardless of which form the public was completing and submitting to the BLM and we had also estimated fewer annual responses per form in some cases. (In the previous collection, the BLM did not aggregate the annual burden costs for all collections, but the previous aggregate would have been higher than the current one)

In the previous collection, the BLM did not publish information on filing or processing fees associated with some of these forms under this information collection because the regulations setting those fees had not yet been adopted. When the BLM modified its grazing regulations in 2006 to increase the service charge for transfers to \$145 and for canceling or replacing a previously issued grazing fee bill to \$50, among other things, it instituted a program change that could potentially increase the non-burden hour costs to the public for this information collection. However, the 2006 BLM rulemaking that changed these regulations were enjoined “in all respects” by the Idaho Federal District Court (for reasons other than the changes to the service charge schedule) in June, 2007. A final judgment by the Court affirming this injunction was entered on February 28, 2008, and it is now subject to appeal.

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

The BLM publishes grazing authorization information in the Public Land Statistics once annually. In addition, BLM grazing authorization information is available to the public in real time on a permit and allotment basis via the use of Geographic Information System technologies. See: <http://www.geocommunicator.gov/NILS-PARCEL2/map.jsp?MAP=GA>

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.

BLM will display the expiration date of the OMB approval.

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

There are no exceptions to the certification statement.

Section B. Collections of Information Employing Statistical Methods:

The BLM does not use statistical methods to collect information under this program.