

Supporting Statement for a New Collection RE: Visitor and Business Surveys for Cape Hatteras National Seashore

OMB Control Number 1024-new

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) requests emergency processing of an Information Collection Request for a survey of local businesses at Cape Hatteras National Seashore (CAHA) from June 1 – August 31, 2009 and survey of recreational visitors to be fielded from Memorial Day weekend 2009 through October 2009. (The visitor survey will continue through February 2010 under a regular ICR.) These surveys will gather information for use in the planning and rulemaking processes for CAHA's Off-road Vehicle (ORV) Management Plan/Environmental Impact Statement (EIS) and ORV rule-making. The NPS is under a court order (**ATTACHMENT A**) to complete the planning process for managing ORVs by December 30, 2010 and to complete the promulgation of a final rule by April 1, 2011. The completed plan and rule could change ORV and pedestrian access to CAHA beaches during the nesting seasons for certain species. If this occurs, visitors, as well as small businesses supported by visitors, would be affected. The surveys will provide an important source of information for a benefit-cost analysis, a small business analysis, and the EIS. Use of normal clearance procedures is reasonably likely to cause the NPS to miss the court-ordered deadline to finalize the ORV management plan and special regulation. The NPS requests action from OMB on this ICR by **May 18, 2009** in order to field the visitor surveys by Memorial Day weekend, 2009.

On October 29, 2008, Department of the Interior officials approved the NPS alternatives for ORV management in the draft EIS and released the alternatives to a Negotiated Rulemaking Committee formed by the park. This committee of stakeholders attempted to negotiate a consensus alternative for ORV management at the Seashore by considering the proposed alternatives and possible modifications to them. At its final meeting in late February 2009, the committee was unable to reach consensus on an alternative. However, agreement was reached on some aspects of ORV management. Therefore, the park has revised the alternatives crafted in October to reflect as much as possible the committee's discussion.

The proposed surveys of businesses and recreational visitors contain questions asking respondents' to evaluate the potential effects of the revised alternatives. Federal statutes, including Executive Order (E.O.) 12866—as amended by E.O. 13258 of February 26, 2002 and E.O. 13422 of January 18, 2007—require that NPS conduct a benefit-cost analysis of the proposed regulation and an analysis of the impact of the regulation on small businesses under the Regulatory Flexibility Act (RFA) of 1980 (**see ATTACHMENTS B, C, D, and E.**) The EIS must also include a description of the impact of the alternatives on the socioeconomic environment of the park, including recreational visitation. To comply with these

requirements, the business survey asks operators of local businesses about the characteristics and size of their businesses and the likely impacts of the action alternatives, including various beach-closure scenarios, on their revenue. The visitor survey collects information on potential behavioral changes by visitors in response to the alternative proposals.

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.]

This is a new collection. It will be used by the NPS to develop the socioeconomic analysis for the EIS, the rulemaking benefit-cost analysis, and the Regulatory Flexibility Act analysis for small businesses. The EIS and the benefit-cost analysis require a general description of the socioeconomic environment, including the business community, the economy of the area in general, the visitor population, and the population characteristics of the local communities. After the general description, data are needed to analyze the economic impacts of the action alternatives relative to the no-action alternative. Economic impacts include changes in producer surplus and consumer surplus. Estimating changes in producer surplus require assumptions about the impact that the action alternatives will have on revenue and business activity. Estimating changes in consumer surplus requires assumptions about behavioral changes on the part of visitors in response to the management alternatives. For the Regulatory Flexibility Act analysis of the impacts on small entities, the NPS needs information on the number of small businesses based on the threshold for specific NAICS codes. The impacts on small businesses relative to large businesses will be based on the analysis done for the EIS and the rulemaking.

In the EIS, the NPS will analyze the impacts of the proposed action alternatives relative to the no-action baseline using a set of scenarios for each alternative to reflect the uncertainty of future impacts. The information from the visitor and business surveys are one source of data for developing the scenarios.

Business Surveys:

Some public information is available on businesses; however, these data are often out-of-date and incomplete. The NPS recognizes the possibility of strategic responses to the business survey. Therefore, information from the business survey will be supplemented by and cross-checked against the publicly available information from the past summers' visitation patterns. The information collected from the businesses, along with other sources of information, will be used to develop high, medium, and low impact scenarios for each action alternative. All the different businesses in the villages on Cape Hatteras are interdependent and in some way affected by the flow of visitors to the area. To simplify the data collection process and use survey resources effectively, we selected five primary industry categories for interviewing, including: 1) recreational supplies, 2) real estate and rental homes, 3) lodging excluding rental homes, and 4) commercial fishermen. Responses to the interviews will be used to develop high, medium, and low impact scenarios for the entire area, including business sectors that will not be interviewed directly, such as restaurants, grocery stores, and gas stations.

APPENDIX F contains the survey instruments for the different industry categories: 1) recreation supply businesses (survey #F1); 2) real estate and rental home businesses (survey

#F2); 3) lodging businesses excluding rental homes (survey #F3); and 4) commercial fishermen (survey #F4). These surveys all follow the same format, with appropriately worded questions for the specific industries. Justification for the specific questions is as follows:

- First set of questions: General information describing the businesses, including services and products offered and seasons of operation. The information will be used to characterize the businesses community in general in the EIS and rulemaking.
- Second set of questions: Collect information on revenue and number of employees to classify the size of businesses as required by the Regulatory Flexibility Act and to characterize the business community in general for the EIS and rulemaking analyses.
- Third set of questions: Collect information on any changes in revenue between 2007 and 2008. The two no-action alternatives for the EIS are management under the Interim Species Management Plan (which was in place in 2007) and management under the consent decree (which went into effect in April 2008).
- Fourth set of questions: Collect information on operators' opinions of how alternative management scenarios will affect their customers/activity and their revenues inform the benefit-cost analysis and to provide information on which to base the range of impacts to producer surplus that might occur under the action alternatives.

Table A1. Questions in Business Surveys (Attachment F).

Survey Type	Characterize Business Community	Size of Business	2007-2008 Revenue Impacts	Response to Action Alternatives (revenue change)
Recreational supply	1, 2, 3, 4, 13, 25, 26	5, 6, 7, 8, 9, 10, 11, 12	14, 15, 16, 17, 18, 19	20, 21, 22, 23, 24, 27
Real estate	1, 2, 3, 12, 24, 25	4, 5, 6, 7, 8, 9, 10, 11	13, 14, 15, 16, 17, 18	19, 20, 21, 22, 23, 26
Lodging	1, 2, 4, 13, 25, 26	3, 5, 6, 7, 8, 9, 10, 11, 12	14, 15, 16, 17, 18, 19	20, 21, 22, 23, 24, 27
Commercial fishermen	1, 2, 3, 4, 5, 6, 9, 10, 11	7, 8, 12	13, 14, 15, 16, 17, 18	19, 20, 21, 22, 23, 24

Visitor Surveys: Visitors will be intercepted on the ocean beaches at CAHA and a short survey will be administered. **APPENDIX G** contains appropriately worded surveys for: 1) out-of-town visitors on overnight trips (survey #F6); 2) out-of-town visitors on day trips (survey #F7; and 3) local residents of the Outer Banks and Manteo, NC (survey #F8).

Justification for the specific questions is as follows:

- First set of questions: These questions will be used in a non-response bias analysis.
- Second set of questions: Zip code and recent visitation patterns are used to identify local residents, characterize the geographic diversity of visitors, distinguish frequent visitors from first-time or infrequent visitors, and identify day visitors and overnight visitors. This information will improve understanding of variability in response to the action alternatives.
- Third set of questions: These questions describe possible management approaches to ORV and pedestrian use in CAHA and ask the visitor about their likely behavioral response. These questions will be used to develop the EIS scenarios describing the possible range of reactions to the different action alternatives. Two versions on these questions will be used and each respondent will be randomly assigned to one version. The two versions are designed to capture the features of different action alternatives.

Each respondent will only answer one of the versions in order to keep the survey short.

- **Fourth set of questions:** These questions describe visitors’ current trips and their uses of other beaches in the U.S. There are separate survey items for out-of-town visitors on overnight trips, out-of-town visitors on day trips, and local residents. The questions about trip characteristics and use of other beaches will be analyzed in conjunction with the responses to the behavioral-change items to examine differences in responses by trip characteristics. Because out-of-town visitors spend the most money in the local economy, changes in their visitation patterns will have a larger impact.
- **Fifth set of questions:** This question asks the respondents willingness to buy a 12-month permit to drive on the beaches at CAHA for one of three prices (\$10, \$25, and \$100). Revenue from sales would be used to manage beach driving. The prices will be randomly assigned so that a visitor responds to only one price. The permit is being considered by the park as part of the action alternatives.

Table A2. Questions in Visitor Surveys (Attachment G).

Survey type	Non-response Bias Analysis	Types of Visitors	Response to Action Alternatives (behavioral change)	Trip Characteristics	Willingness to Buy a Beach-driving Permit
Out-of-town, Overnight Trip	A, B, C	1, 2, 3, 4, 5, 6, 7, 8, 15, 24, 25	Version A: 9, 10, 11, 12 Version B: 13, 14	16, 17, 18, 19, 20, 21, 22, 26, 27	23
Out-of-town, Day Trip	A, B, C	1, 2, 3, 4, 5, 6, 13, 19, 20	Version A: 7, 8, 9, 10 Version B: 11, 12	14, 15, 16, 17, 21	18
Local Residents, Day Trip	A, B, C	1, 2, 3, 4, 5, 6, 7, 8, 9, 13, 17, 18, 19, 20, 21, 22	10, 11, 12	14, 15, 23, 24	16

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.

This information will be collected via on-site surveys for the visitor survey and telephone interviews for the business survey. No automated data collection will take place, although the visitor survey will use electronic hand-held devices for data input in the field. These devices allow automatic branching between questions to reduce interviewer error during survey administration.

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.

Business survey: We know of no other systematic surveys of businesses related to the set of alternatives for ORV management under consideration.

Visitor survey: The questions in the visitor survey address specific knowledge gaps related to current use of the park by visitors and the impact of ORV management plans on visitation

plans. We know of two visitor surveys conducted at CAHA on the topic of ORV use. Vogel song (2003)—sponsored by NPS—interviewed visitors at several locations in the park and asked general questions about current trips and some specific questions about ORV use. The survey was limited to a few locations in the National Seashore. Neal (2005) surveyed visitors staying at selected lodging facilities, as well as local residents who used the beach for recreation. This survey also contained questions about current trips and specific questions about ORV use. The Neal sample was largely a convenience sample. In May 2008, the NPS completed an external peer review of these two studies by a panel of five university experts. The panel concluded that the data from the surveys did not provide a sound scientific basis for evaluating the socioeconomic impacts of the action alternatives being considered in the draft EIS.

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

Business survey: The business survey collects information for the Regulatory Flexibility ACT analysis of impacts on small businesses as part of any future rulemaking. Therefore, small businesses are included in the universe of respondents. The burden on small businesses is minimized by keeping the survey as short as possible and by setting up phone interviews at the owners' convenience.

Visitor survey: The visitor survey does not involve any small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Should these data not be collected, NPS evaluations of ORV management policies on visitors and businesses would be made without input on actual business experiences and information or without information from a representative year-round sample of visitors. This could result in inaccurate analysis of the impact of ORV management alternatives in the EIS and for the rulemaking. In turn, this could be grounds for court challenges to the EIS and final rule. The analysis will be conducted for low-, medium-, and high-impact scenarios for each action alternative. Without data from the business and visitor surveys, the ranges considered for these scenarios will be based on assumptions and available secondary data, rather than on responses from a representative sample of affected businesses and visitors.

The sampling schedule and target sample size efficiently collect the data needed for providing the range of experiences from the interviews and for providing a robust estimation of survey data. Restricting the proposed sample size and schedule would risk compromising the significance and reliability of the information collected.

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.

These circumstances are not applicable to this collection of data. These surveys consist of one-time interviews, so frequency of reporting, preparation or submission of documents, and retaining of records do not apply.

The business survey data will be maintained on RTI's secure network in folders accessible only by project staff. Only aggregate data will be reported, and it will be summarized in such a way that individual responses or firm-specific data cannot be identified.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Because this is a request for emergency processing, public comments have not yet been solicited through the *Federal Register*. However, the NPS consulted with a variety of persons outside the agency to prepare the survey. Most of the consultation occurred with members of the Federal Regulatory Negotiating Committee authorized to provide NPS and CAHA with input on the ORV management issue. The committee consisted of a wide variety of stakeholders, including businesses who will be directly affected by the proposal, individuals who live outside the community but own property near CAHA, as well as other stakeholders. The committee formed a subcommittee on the economic analysis of the proposed alternatives. This subcommittee received more detailed information on the survey plans and provided feedback to the NPS and to RTI.

Business surveys: The survey instrument is based on similar surveys conducted by the contractor at other National Park System units. While the issues are somewhat different, the previous experience interviewing businesses provides guidance on the wording of the questions, respondents' ability to answer such questions during a telephone interview, and the likely length of the interviews.

Visitor surveys: In addition to the outside consultation described above, survey researchers at RTI who have conducted beach intercept surveys (Dr. F. Reed Johnson) and recreation surveys (Dr. Christine Poulos and Dr. Carol Mansfield) provided input on the question wording. The sampling plan benefited from feedback provided by RTI sampling statisticians and survey administrators.

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

Business survey: No payments or gifts will be provided to respondents.

Visitor survey: No payment or gifts will be provided to respondents.

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

Business Survey: No assurance of confidentiality will be provided to respondents, since the Department of the Interior does not have the statutory authority to protect confidentiality or to exempt the survey from a request under the Freedom of Information Act. However, according to DOI solicitors, if a business requests that we keep its data confidential because failure to do so would cause a significant competitive disadvantage, then individual responses linked to the name of a business are not subject to FOIA. We will document such requests during the interview process, and we will release aggregate information from the surveys in a way that doesn't identify the businesses

Businesses will be assured that RTI will protect the anonymity of their responses to the extent permitted by law, although confidentiality cannot be guaranteed. In the initial contact letter sent to business owners, as well as in the survey script, the following language is used, "We will not report any information about individual businesses to any other businesses or to the National Park Service unless compelled by law. Even then, if you request it, we are not required to share information that could be used to link your answers to your own business if this would cause you a significant competitive disadvantage."

A field in the telephone script allows interviewers to record whether or not a respondent requests that his/her identifying information be protected.

Visitor Survey: Names and addresses of visitors will not be collected in association with this research. Thus, anonymity will be ensured, but confidentiality will not be pledged. The statement at the beginning of the survey will inform respondents that reports prepared from this study will summarize findings across the sample so that responses will not be associated with any specific, identifiable individuals.

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.

No questions of a sensitive nature will be asked. In addition, respondents are advised that their answers are voluntary.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Table A3. Projected Number of Respondents, Completion Times, and Burden Hours for CAHA Business Surveys.

	# of Respondents	Frequency of Response	Completion Time	Burden Hours
Completed surveys	130	1	30 min	65
Estimated refusals	20	1	2 min	1
TOTAL	150			66

The business survey should take approximately 30 minutes to complete. A total of 150 businesses will be contacted. We expect that approximately 20 businesses will refuse to participate or will be unable to participate. The refusals result in approximately 2 minutes of burden each. We expect that 130 businesses will respond to the survey, for a total of 66 hours of burden, assuming a 30-minute interview. Using the Bureau of Labor Statistics national wage information, the most recent published report (March 2009) lists an average hourly wage of \$29.18 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). Within this hourly figure, \$20.37 is accounted for in hourly wages and salaries and \$8.81 for benefits. Thus, the estimated annualized cost to respondents for the hour burden is \$1925.88.

Table A4. Projected Number of Respondents, Completion Times, and Burden Hours for CAHA Visitor Surveys.

	# of Respondents	Frequency of Response	Completion Time	Burden Hours
Completed surveys	1,200	1	10 min	200
Estimated refusals	800	1	2 min	27
TOTAL	2,000			227

The visitor survey should take no more than 10 minutes to complete. Approximately 2,000 visitors will be approached and asked to participate in the survey. A 2002 visitor survey at CAHA achieved a response rate of 74%, but this was a very short on-site interview, followed by a mailback survey and was conducted only during the summer season. For this study, we assumed a 60% response rate, meaning that approximately 800 visitors will refuse to participate. The refusals will result in approximately 2 minutes of burden each, for a total of 27 hours. We expect that 1,200 visitors will respond to the survey, for a total of 200 hours of

burden, assuming a 10-minute interview. Using the Bureau of Labor Statistics national wage information, the most recent published report (March 2009) lists an average hourly wage of \$29.18 (<http://www.bls.gov/news.release/pdf/ecec.pdf>). Within this hourly figure, \$20.37 is accounted for in hourly wages and salaries and \$8.81 for benefits. Thus, the estimated annualized cost to respondents for the hour burden is \$6623.86.

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

The cost burden on respondents and record-keepers, other than hour burden, is zero.

- 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 estimated annualized cost to the Federal government is \$101,683 (Table A5).

Table A5. Annualized Cost to the Federal Government

Expense category	Cost
Labor plus overhead	\$83,221
Travel + incidentals	\$15,837
Equipment	\$2,625
TOTAL	\$101,683

- 15.** Explain the reasons for any program changes or adjustments.

This is a new one-time collection. No adjustments are involved.

- 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.

Data from the businesses surveys will be used to inform the economic analysis of ORV management alternatives in the EIS and for the rulemaking. The EIS and rulemaking reports will include a summary of the business survey, including the number of firms interviewed and distribution frequencies for the responses.

The target date for fielding the business survey is late May and June 2009, and interviewing will continue through the end of July 2009, as needed. Data analysis and preparation of text for the Draft EIS and proposed rulemaking will take place as soon as data collection is completed.

Table A6. Business Survey Schedule.

	March – May 2009	June 2009	July 2009
Emergency clearance	x		
Construct sample	x		
Conduct interviews	x	x	
Data analysis		x	x
Prepare text for draft EIS and proposed rule-making		x	x

The target date for fielding the visitor surveys is Memorial Day weekend of 2009. Assuming approval is granted in May, the survey will continue for 180 days, at which time the emergency clearance will expire. Because a year-round visitor sample is needed for the final EIS and rule-making, a 60-day *Federal Register* notice will be published in April or May 2009 to initiate a regular ICR. This will allow the visitor surveys to continue after the expiration of the emergency clearance.

Table A7. Visitor Survey Schedule.

	March – May 2009	June – Oct 2009	Nov 2009 – May 2010	June-July 2009
Emergency clearance and publication of 60-day FR notice for regular clearance	x			
Construct sample	x			
Conduct interviews under emergency clearance		x		
Continue interviews under regular clearance			x	
Data analysis		x	x	x
Prepare text for Supplemental EIS if needed based on results		x	x	
Prepare text for Final EIS and final rulemaking if needed based on results				x

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.

We are not seeking such approval.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

Appendices: Supporting Materials and Survey Instruments

- A. Consent Decree of April 30, 2008
- B. Executive Order 12866
- C. Executive Order 13258
- D. Executive Order 13422
- E. Regulatory Flexibility Act of 1980 (excerpts)
- F. Business Surveys
 - 1. Recreation supplies, piers, and marinas
 - 2. Real estate and rental homes
 - 3. Lodging, except rental homes
 - 4. Commercial fishermen
 - 5. Initial letter to business owners
- G. Visitor Surveys
 - 1. Intercept survey for out-of-town visitors on overnight trips
 - 2. Intercept survey for out-of-town visitors on day trips
 - 3. Intercept survey for local residents on day trips
 - 4. Survey log