

**Supporting Statement for Paperwork Reduction Act Submission
Part A**

POMPEYS PILLAR VISITOR SURVEY

OMB Control Number: 1028-NEW

Terms of Clearance: None

- 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 Bureau of Land Management is revising the Pompeys Pillar National Monument (PPNM) Resource Management Plan (RMP). By statute and regulation the BLM must use social science research data in the preparation of informed, sustainable land use planning decisions. Section 202(c)(2) of the Federal Land Policy and Management Act (FLPMA) requires BLM to integrate physical, biological, economic, and other sciences in developing land use plans (43 USC 1712(c)(2)). FLPMA regulations 43 CFR 1610.4-3 and 1610.4-6 also require BLM to analyze social, economic, and institutional information. Economic analyses should reflect professional integrity, including scientific integrity (40 CFR 1502.24). The economic analyses in BLM's Resource Management Plans should meet: 1) CEQ's requirement for rigorous and objective analysis, 2) the hard look doctrine that has emerged from case law related to the National Environmental Policy Act, and 3) agency internal guidelines for economic analysis. The objective of this information collection is to estimate PPNM visitor expenditures in the surrounding communities. This information will be used to calculate the regional employment and income effects of PPNM visitor spending for the RMP analysis. Collection of these data is necessary for a rigorous and objective economic analysis that meets the "hard look" doctrine that has emerged from case law related to NEPA and to meet internal guidelines for credible economic analysis.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The USGS Fort Collins Science Center is working with the BLM Montana State office for this data collection effort. The information collected will be used by BLM to understand the spending trends of PPNM visitors in the surrounding local communities. The information will be used to calculate the regional economic impacts of PPNM visitor spending for the RMP analysis.

Below is an explanation of the sections of the survey instrument and the way in which the information will be used (see attachment 1 for justified questions).

- Section 1 provides an understanding about basic trip characteristics needed to conduct a travel cost analysis including number of days spent in the local area, distance traveled, and time spent at PPNM. This section also provides baseline data for the BLM managers and planners that has not been previously collected or documented.
- Section 2 provides information about trip expenditures. This information along with the trip characteristic information from Section 1 is needed to develop visitor spending profiles on a per person per trip basis.
- Section 3 addresses basic demographic information.

- 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 Government Paperwork Elimination Act requirements].

Automated or electronic data collection methods will not be used. All information collected in the study will be gathered on-site. An electronic spreadsheet will be used for tabulating data and data analysis.

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.

No duplication will occur. Visitor spending data are not available for PPNM. No BLM land units that have a similar makeup have information available on visitor spending.

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

No small businesses or organizations are involved or burdened by this study.

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.

As mentioned in question 4, above, there is presently no data on this topic from which to draw information. If this information is not gathered the BLM will not be able to address the importance or impact of visitor spending in the local communities in the economic section of their revised RMP.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (i) requiring respondents to report more often than quarterly, (ii) requiring respondents prepare written responses in fewer than 30 days after receipt, (iii) requiring respondents to submit more than an original and two copies of any document, (iv) retain records for more than 3 years; (v) 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; (vi) the use of a statistical data classification that has not been reviewed and approved by OMB; (vii) that includes a pledge of confidentiality not supported by authority established in statute or regulation; requiring respondents to submit proprietary trade secrets or other confidential information.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

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.

On February 6, 2009, we published a 60-day Federal Register notice (74 FR 6305) announcing that we would submit this information request to OMB for approval. In that notice we solicited public comments for 60 days, ending April 7, 2009. We did not receive any comments in response to that notice.

In addition to our Federal Register notice, we solicited comments from three reviewers to obtain their views on the clarity of the survey and the annual hour burden for the application materials. The individuals contacted are listed in Table 1 below. We incorporated their suggestions, edits, and comments in the final survey. The respondents also agreed with our estimated burden time of nine minutes.

Table 1. Individuals Contacted

| Contact #1 | Contact #2 | Contact #3 |
|---|---|--|
| Dr. John B. Loomis Colorado State University Department of Agriculture and Resource Economics B310 Andrew G. Clark (970) 491-248 | Dr. Dana Hoag Colorado State University Department of Agriculture and Resource Economics B310 Andrew G. Clark (970) 491-5549 | Dr. Karen Jenni Insight Decisions 1616 Seventeenth St, Suite 268 Denver, CO 80202 (303) 628-5568 |

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

Any visitors who is asked to participate in this survey effort will be given a de minimis incentive. The incentive will be a BLM magnet, notepad, or other item that are generally used as a normal part of the BLM outreach activities

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

For the purposes of confidentiality, all connections between respondent address and returned survey will be eliminated upon receipt. No list of respondent addresses will be retained after data collection is completed.

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.

This collection does not ask for information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

We estimate that the total burden for this collection will be 91 hours. Our estimate is based upon on our own experience with similar collections plus the outreach described in item 8. For this collection we

have considered the time to read instructions and to complete the survey. We expect to receive 600 responses, taking each approximately 9 minutes to complete the survey (totaling 90 burden hours). We will sample a proportion of the visitors who refuse to participate (30 respondents). Every fifth person who refuses to participate will be asked if they would answer 3 questions. We estimate that it will take approximately 2 minutes of their time to listen and to respond to these questions (totaling 1 burden hour).

We estimate an aggregated annual cost to the respondents to be \$2,458 (see Table 2). The hour cost is based on BLS news release USDL 08-1802 of December 10, 2008, for average full compensation per hour including benefits for private industry. The particular value utilized was for \$27.01 for individuals (average hourly wage is \$19.29 multiplied by 1.4 to account for benefits).

Table 2. Estimated annual hour burden of the collection of information

| <i>Activity</i> | <i>Annual Number of Responses</i> | <i>Estimated Completion Time per Response</i> | <i>Total Annual Burden Hours</i> | <i>Dollar Value of Burden Hour Including Benefits</i> | <i>Total Dollar Value of Annual Burden Hours*</i> |
|-----------------|-----------------------------------|---|----------------------------------|---|---|
| Respondent | 600 | 9 minutes | 90 | \$27.01 | \$2,431 |
| Non-Respondent | 30 | 2 minutes | 1 | \$27.01 | \$27.01 |
| TOTAL | 630 | | 91 | | \$2,458 |

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).

There is no non-hour cost burden to applicants under this collection. There is no fee for application, nor any fees associated with application requirements.

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 estimated cost to the Federal Government is \$17,082. This includes Federal employee salaries and benefits (Table 3) and survey printing cost (Table 4). The table below shows Federal staff and grade levels performing various tasks associated with this information collection. We used the Office of Personnel Management Salary Table 2009-RUS (http://www.opm.gov/flsa/oca/09tables/html/RUS_h.asp) to determine the hourly rate. We multiplied the hourly rate by 1.5 to account for benefits (as implied in the newsletter mentioned above).

Table 3. Federal Employee Salaries and Benefits

| Position | Grade/ Step | Hourly Rate | Hourly Rate incl. benefits (1.5 x hourly pay rate) | Estimated time per task | Annual Cost |
|-----------------|--------------------|--------------------|---|--------------------------------|--------------------|
|-----------------|--------------------|--------------------|---|--------------------------------|--------------------|

| | | | | | |
|------------------------------|------|---------|---------|---------|-----------------|
| Project Leader, Economist | 13/5 | \$43.66 | \$65.49 | 80 hrs | \$5,239 |
| Social Scientist | 11/9 | \$34.24 | \$51.36 | 80 hrs | \$4,109 |
| Social Scientist | 9/1 | \$22.34 | \$33.51 | 200 hrs | \$6,702 |
| Total | | | | | \$16,050 |

Table 4. Operational Expenses

| Survey Budget Estimate | | | |
|------------------------|--------|----------|--------|
| | Number | Per Unit | Total |
| Survey Printing Costs | 800 | 1.29 | \$1032 |

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

This is a new request.

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.

The data collected during this study will be coded directly into a computerized database. The regional economic analysis will be performed using the IMPLAN software. This is a standard and widely used secondary Input-Output model originally developed by the U.S. Forest Service.

The BLM RMP document is the desired outlet for reporting this information. A time schedule for the project is presented in Table 5 below.

Table 5. Project Time Schedule

| | Start Date | End date |
|-------------------------------|--|----------|
| Survey Information Collection | 7/1/09 or as soon as OMB clearance is received | 09/30/09 |
| Data Analysis | 10/1/09 | 1/31/10 |
| Report Preparation | 2/1/10 | 4/1/10 |
| Final Report | | 6/1/10 |

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. We will display the expiration date.

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

There are no exceptions to the certification statement.