

Supporting Statement for OMB 0596-NEW
Aldo Leopold Wilderness Research Institute Wilderness Visitor Study
2011

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.**

Laws, Regulations, and Statutes

- The Wilderness Act, PL 88-577 (September 3, 1964) (Appendix A)
- California Wilderness Act of 1984 (September 28, 1984) (Appendix B)

The Aldo Leopold Wilderness Research Institute (ALWRI) was established in 1993 by the USDA Forest Service as an interagency (Departments of Agriculture and Interior) effort to bring national and international focus to ecological and social research relevant to understanding and managing wilderness and other protected areas. With a mandate to both develop and provide information, the Leopold Institute aims to conduct and support scientifically rigorous research as well as apply research findings to management needs. The goals of the Institute are: (1) to provide leadership in development and communication of the knowledge needed to protect and preserve wilderness and the ecological and social values derived from wilderness; and (2) to facilitate the application of this knowledge within the wilderness management agencies and other organizations. The Leopold Institute's research program focuses largely around five priority issues, one of which is to understand the effects of recreation use and recreation management strategies on wilderness attributes and visitor experiences; another is to understand how relationships between people and lands protected for their wilderness values affect and are affected by management policies and actions.

To help meet Federal agencies' mandates related to recreation, scientists at the Aldo Leopold Wilderness Research Institute periodically monitor and report, to managers, the scientific community and the public, visitor use and user characteristics and visitor feedback on management actions on federal lands, including wilderness in National Parks, Wildlife Refuges, National Forests and Bureau of Land Management. Agency personnel use the collected information to ensure that visitors' recreational activities do not harm the natural resources of the parks and that wilderness-type recreation experiences are protected. Common uses are for updating wilderness stewardship plans and developing goals and objectives for public communication plans.

The Leopold Institute seeks Office of Management and Budget (OMB) approval to record visitor responses at the Sequoia & Kings Canyon National Parks Wilderness in 2011 and 2012. Some responses are to be compared to the most recent survey there, in 1990, and some responses concern newly emerging issues faced by managers trying to develop plans for future management. Survey questions and subsequent analysis will improve understanding of how

visits and visitors are changing and how they are responding to management policies initiated to protect wilderness attributes and visits there.

Sequoia and General Grant (later to become Kings Canyon) National Parks were established by Congress in 1890, our 2nd and 4th National Parks. Later these two parks were enlarged, names were changed and eventually they were combined into one administrative unit. Under the authority of the Wilderness Act of 1964, Congress acted in 1984 (Appendix B) to formerly designate about 85% of the two parks as Wilderness with additional acreage managed under wilderness direction. Use of these areas was estimated to be over 2 million visitors per year by the end of their first century of existence, most of it in the non-wilderness acreage, however.

The National Park Service has not undertaken any systematic studies of the area's wilderness or recreational values since a study in 1990 conducted to address growing conflict between hikers and recreational stock users. The proposed visitor study will address manager information needs defined by current managers to inform the Park's upcoming Backcountry Management Plan revision and in the development of its Wilderness Stewardship Plan, and some ability to evaluate progress in resolving conflict between users.

The Wilderness Act (PL 88-577) (Appendix A) directs that wilderness be managed to preserve natural conditions and to provide outstanding opportunities for solitude or a primitive and unconfined type of recreation. The Act also indicates our National Wilderness Preservation System is to be administered for the use and enjoyment of the American people in such manner as will leave these areas unimpaired for future use and enjoyment as wilderness, and encourages the gathering and dissemination of information regarding the use and enjoyment of these areas as wilderness. To meet these management goals, managers must adapt their programs to changes in the amount and type of use and resultant conditions. It is important managers be aware of likely visitor response to proposed management actions and visitor preferences for resource conditions. Unfortunately, it is expensive and other resources are very scarce that are needed to provide updated information to managers about public clientele, thus many decisions are made without proper scientific support.

The current information collection is needed to inform managers and the public on how visitors and their visits have changed as a result of changing policies, natural disturbances and national, regional and local societal changes in the 1990s and early 21st century. This knowledge is also necessary so that managers can continue to adapt current programs to changing societal interests and needs, yet meet the intent of the legislation that created this large, protected area in California.

- 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.**
 - a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

Respondents will be asked a variety of questions about their trip, things that may have influenced their trip, preferences for management actions and who they are. For example:

- How encountering administrative support facilities, user support facilities, research support facilities and increasing use of hand-held technology influences perceptions of wilderness quality.
- Perceptions of trail conditions or campsite conditions.
- How visitors feel about the level of encounters they have with other visitors.
- How visitors evaluate management actions taken to control visitor impacts.
- How visitors define the most important elements of the wilderness environment
- Frequency and total number of visits to the Sequoia & Kings Canyon National Parks Wilderness and other Wildernesses
- To describe their own trip and socio-demographic characteristics
- To describe activities engaged in during visits
- If they come in groups, and, if so, the size of those groups, and if their group was outfitted or guided on the trip
- Duration of visit
- If they have recommendations or expectations for management actions that will protect the values they associate with this place or increase visitor enjoyment of the wilderness qualities found here?

b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

Respondents will be local and non-local visitors, sixteen years or older, who visit the Sequoia & Kings Canyon National Parks Wilderness for overnight camping trips during the primary use season, May 1 to September 30, 2011, or potentially extended to 2012 to meet sample size needs or in case of natural disturbance-related delays (e.g., fire, flooding, etc.).

c. What will this information be used for - provide ALL uses?

Primary Purpose: To provide information to managers from visitors that can be used to inform the upcoming revision of the Park's Backcountry Management Plan, the Wilderness Stewardship Plan, and in making large and small-scale management decisions that affect the visitor's experience, both directly and indirectly through protection or restoration of the wilderness attributes associated with this place.

Overall Goal: To provide management with more accurate understanding of visits and visitors, how visitors respond to things they encounter in the Wilderness at Sequoia & Kings Canyon National Parks and develop confidence in how visitors and the larger public will respond to future management decisions.

Specific Objectives:

- (1) Describe overnight visitor demographics and trip characteristics at the Parks:
 - a. individual visitor characteristics, visitor demographics, frequency of visits, and residence community;
 - b. trip characteristics, such as whether they are fishing or not, length of visit, size of group, guided or unguided;
- (2) Evaluate the importance of various hypothesized influences on the overall quality of visitors' trips. Determine the extent to which user support, administrative support and research support facilities influence perceptions of wilderness and level of support for management intent to increase, hold steady or decrease the presence of these types of installations in the Wilderness.

Project Application:

This research will contribute to the development of the Sequoia & Kings Canyon National Parks backcountry management plan. Planners need to know how their user base has changed in order to plan for development of Leave No Trace recommendations & requirements, updating social and impact standards & indicators, and understanding how visitors likely will respond to proposed changes in policies such as changes to registration/permit/rationing systems, determining the types and detail of trip information to be collected and provided; consideration of recreational developments; development of law enforcement strategies; addressing issues related to potential use of helicopters and new forms of technology for public access/use; and consideration of new policies related to geocaching.

This research will also be used to support planning through:

- Advancement of knowledge about visitor attitudes toward administrative, user and research support facilities on public lands
- Development of other visitor management strategies, such as strategies to disperse use; consideration of use allocation issues; development of interpretive messages and themes; development of monitoring techniques; and identifying other informational needs
- Evaluating other potential agency actions that may less directly affect visitor perception and experience of the Parks:

Consideration of actions or proposals related to maintaining natural

diversity, habitat manipulation, and conducting research; perpetuation of wildness and the freedom of natural processes; use of helicopters for official uses not necessary for protecting resources; considering the appropriateness of certain research techniques and installations; development of interpretative messages and themes not specific to visitor use; responding to requests for new technology uses.

Previous information collections of this type has been used in the past for: (1) developing and updating wilderness and backcountry management plans, as part of required Forest, Refuge and National Park plan revisions; (2) guiding development of communication plans for informing and educating the public about wilderness opportunities and regulations; (3) providing a basis for monitoring long-term resource and social conditions in wilderness; and (4) providing substantial knowledge for basing decisions about wilderness allocation, facility development, and non-wilderness area management. Multiple research publications have been developed to inform managers, commercial interests, academia, and the public about findings.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

The information will be collected by survey instruments available to the respondents via the Internet or on paper.

Names and addresses of party leaders will be captured through the current permit system for mailing a survey, along with information for access to an electronic version of the survey. Party leaders will be asked to voluntarily provide names and addresses of up to two party members, to avoid a party leader sampling bias. All responses will be voluntary.

Participants will receive a mailed copy of the questionnaire booklet and a letter explaining the purpose of this information collection activity. Those receiving the mail back version will also get a pre-paid, addressed envelope to use for returning the questionnaire. They will also be given the alternative choice of submitting the form through electronic format.

e. How frequently will the information be collected?

This information will only be collected once for each visitor contacted during the use season, representing one trip to the Sequoia & Kings Canyon National Parks Wilderness.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

The Leopold Institute is the only research unit of the Federal government focused on research to support the National Wilderness Preservation System, representing both the Department of Agriculture and Department of Interior. For that reason, Federal agency managers and planners, academic instructors and students, membership organizations and cooperative

institutions place constant demand on publications from the Leopold Institute to inform management decisions. The Leopold Institute has a Research Applications Program that proactively works to assure that research results are available to managers, and the Institute is guided by an Inter-agency Steering Committee that helps develop research priorities and assure managers in both the Departments of Agriculture and Interior are aware of recent research findings.

Reports will be available on the Aldo Leopold Institute website, and publications will be available at no cost to interested parties as they become available over the website.

g. If this is an ongoing collection, how have the collection requirements changed over time?

This is a new information collection. It is a partial replication of a study done in 1990 with OMB clearance (OMB 0596-0111).

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.

Survey methods allow the use of web-based or e-mail versions. Proponents perceive an opportunity to improve electronic, automated data collection methods for wilderness user surveys. Electronic submission of responses will be encouraged, and the anticipated profile of users at this California wilderness is expected to be highly compatible with electronic technology availability. With expectations nearing two-thirds of the U.S. population having e-mail and web access, it is anticipated that this user segment will have at least that level of access, or more likely much higher. Data file development will be highly automated for both information collection methods and backed up for storage and analysis. Reports will be available on the Leopold Institute website, and publications will be available at no cost to interested parties as they become available over the website. Data collection methods will follow the latest direction for development, distribution and automated storage of e-based and mail back surveys.

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.

The Aldo Leopold Wilderness Research Institute of the Rocky Mountain Research Station has primary responsibility for research of this type for the Federal government and there has been close collaboration with managers at the Sequoia & Kings Canyon National Parks in planning this study. Studies of wilderness (back country) visitor attitudes toward management and perceptions of impacts have not been conducted at this location since 1990 in a study by this same Principal Investigator. In this previous study, about 390 visitors were sampled in order to focus a study on conflicts between hikers and stock users.

At the request of the National Park Service (NPS) Dr. Peter Newman, of Colorado State University, conducted a study in 2011 at Sequoia & Kings Canyon National Parks. This study occurred over about one month of the summer season in 2011 and has been completed. It was focused on obtaining responses in person from (front country) visitors to noises audible within the Park. Visitors were exposed to specific, controlled levels and durations of noises (such as jet and helicopter over-flights) and asked to provide answers to specific questions about these noises.

There is no overlap in purpose between these two studies, the sampling method, or duplication of this data collection to survey wilderness (back country) visitors about their wilderness trips and conditions they encountered during 2011 and 2012 and the NPS study. During the time this study is scheduled to occur, there is no other study of wilderness visitors occurring there in 2011/2012. The wilderness (back country) information collected is not addressed in other studies at this location and is not available or expected to be available from other sources.

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

This information collection has no impact on small businesses or other 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.

Since most federal wilderness areas in the U.S. have never had a study of visitor preferences, characteristics, and behavior conducted, this study is capitalizing on a unique opportunity at the Sequoia & Kings Canyon National Parks Wilderness. There is fear that visitor use patterns, their expectations, and response to federal policies have been changing and will continue to change at a rapid rate. Without the ability to understand these changes, budget allocations could become inefficient, management policies ineffective, and potential to conform to the Wilderness Act intent less likely.

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 secret, 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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A Federal Register Notice asking for comments on this project was published on Monday, June 14, 2010, in Volume 75, No. 113, on page 33573 and 33574 (Appendix C)

One comment, dated July 11, 2010, was received from J. Public and is included below (Comment 1). The Forest Service did not respond.

Comment 1: "do we still have 1935 leopold policies in effect in 2010 or has any modern movement come along that offers more learning than what was thought in 1935. sometimes i think forest service is in a time warp from 1950.

i also note the first question is about the public employees wants. there seems to be no understanding by these public employees that they are "public servants" who should be helping americans, not acting in a dictatorial, mussolini type way with them, ordering them around and giving them "alternatives". americans know what they want. americans know why they busted their hump to save this land and it wasnt so some employees can order them around. the forest lands should be saved for our kids. can anyone teach these officious employees about the words "public servant"

i oppose this proposal.
jean public 8 winterberry court whitehouse station nj 08889"

One additional comment (**Comment 2**) was received from the High Sierra Hiker's Association, headquartered at Lake Tahoe, California. This comment and the Forest Service response is included as Appendix D. These comments were detailed and helpful in revising the survey regarding issues that are specific to this user group, but there were many comments that ranged beyond the purpose of this survey. They made no comments on cost or time 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

About 15 regional and local interests were identified and sent the Federal Register announcement, inviting comment on data elements to be recorded, disclosed and reported. Only the High Sierra Hiker's Association responded with a comment (Appendix D). Among those also invited to comment included: several local chapters of the Backcountry Horsemen of California, Alpine Skills International, California Alpine Guides, Lost Valley Camp Pack Station, several Sierra Club chapters and the State of California.

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.

In lieu of attempting to contact potential visitors to the Parks for comments, proponents contacted university faculty and other scientists in the field with an interest in public lands management in addition to the user group associations identified above. They were asked to review the methods proposed, the draft survey, and to comment on all aspects of data collection, including complexity of questions and the value of each question proposed, both old ones asked previously and new ones.

Reviewers/Commenters:

- Dr. Steve Martin (regional university faculty with experience and interest in federal public lands issues in California), Humboldt State University, Arcata, CA.
- Dr. Dan Williams (federal social scientist with the Rocky Mountain Research Station, USDA Forest Service), Ft. Collins, CO.
- Dave Parsons (USDA Forest Service, retired) with extensive experience at Sequoia & Kings Canyon National Parks and other public lands recreation issues, Florence, MT.

Additionally, extensive consultation was conducted with Federal managers at the Sequoia & Kings Canyon National Parks. E-mails, letters, drafts of the measurement

instrument and proposals were exchanged, as well as participation in conference calls for study planning. Written comments were obtained by managers, with many very valuable suggestions for wording of questions. Through the Federal Register comment process described above, comment was received from one regional interest group that was also helpful with wording of specific questions and assuring validity of issues studied.

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

There are no plans for payment or gifts to respondents as incentives to respond.

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

At the beginning of each mail back or electronic survey, the respondent will be informed that their responses to the questions being asked are voluntary, will be kept secure, and will not be shared. The name and address (or e-mail address) for mailing of the questionnaire is the only reason for recording their name and address. All name and address files will be destroyed as results are obtained, though one extra mailing label (or the e-mail address) will be retained for possible mailing of a summary of results to those expressing interest in receiving it. All respondents will be offered an opportunity to receive this summary upon completion of analysis.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

Generally, the survey questions are not considered sensitive and related only to visits to this area or similar areas. Respondents are asked for preferences, past experience level, and attitudes toward existing and potential management policies.

Respondents are asked to indicate their annual, household incomes. In previous OMB submissions it has been recommended by OMB reviewers that we include this item in order to understand more about the segment of society being served by these federal services. From a trends perspective, we commonly compare household income levels to not just those reported in earlier studies, but to those reported by visitors in other regions and to census reports for the region of the wilderness. Our interest is not just in understanding if there have been shifts in the segment of American society visiting wilderness or other wild places, but also how these trends correspond to changes in the local and regional population.

It is of interest to managers and the agency collecting information to understand general U.S. population representation within the survey. Therefore, gender, education and the race/ethnicity question from the US Census are also included.

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

information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- a) Description of the collection activity
- b) Corresponding form number (if applicable)
- c) Number of respondents
- d) Number of responses annually per respondent,
- e) Total annual responses (columns c x d)
- f) Estimated hours per response
- g) Total annual burden hours (columns e x f)

	(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
M	Mail back or web-based survey	N/A	500	1	500	20 min	167
To	Totals	---	500	---	500	---	167/yr

- **Record keeping burden should be addressed separately and should include columns for:**
 - a) Description of record keeping activity: None
 - b) Number of record keepers: Zero
 - c) Annual hours per record keeper: Zero
 - d) Total annual record keeping hours (columns b x c): Zero
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	©* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Mail-back survey response	167	25.00*	\$4,175

*Based on average weekly salary from Department of Labor, Bureau of Labor Statistics for second quarter of 2010, averaged for B.S. education, men and women: http://www.bls.gov/opub/ted/2010/ted_20100726.htm = \$25/hr.

13. Provide estimates of the total annual 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 estimates 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.

There are no capital operation and maintenance costs.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The response to this question covers the **actual** costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- Employee labor and materials for developing, printing, storing forms
- Employee labor and materials for developing computer systems, screens, or reports to support the collection
- Employee travel costs
- Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information
- Employee labor and materials for collecting the information
- Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information

Annual Cost to the Government (including contractor costs)

ACTION ITEM	PERSONNEL	GS-LEVEL	HOURLY RATE	HOURS	SALARY	COST TO GOV'T*
Scientific oversight for developing data collection methods and analysis planning	Supervisory Research Social Scientist	GS-15 Step-6	\$63.58	130.36	\$8,288	\$ 10,774
Labor for developing computer systems, screens and reports	Research Assistant	GS-6 Step-5	\$18.96	330	\$6,257	\$8,134
Employee travel costs to interact with managers	Supervisory Research Social Scientist	GS-15 Step-6	---	---	---	\$2,500
Contractor Services	Contractor	N/A	\$33	118.2	\$39,000	\$39,000
Data Collection	Research Assistant	GS-6 Step-5	\$18.96	237.87	\$4,510	\$5,863
Labor for analyzing, evaluating and summarizing findings	Supervisory Research Social Scientist	GS-15 Step-6	\$63.58	130.36	\$8,288	\$10,774
TOTAL						\$77,045

*Salary rates from http://www.opm.gov/oca/10tables/pdf/gs_h.pdf - Salary Tables 2010 RUS. Cost to Government calculated at hourly wage multiplied by 1.3.

The total annual cost to the Federal Government will be approximately **\$77,045.**

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

This is a new information collection.

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

As with other public lands visitor studies, our most immediate outlet is usually production of a government publication that is available for download from our website and available to order hard copy at no cost from our publications center. Most people with intense interest in wilderness planning or management frequent our website. Additionally, we will develop scientific reports for the International Journal of Wilderness, the premier scientific and educational journal supported by our federal wilderness management agencies and cooperating organizations. Additionally, preparation of presentations and publications for regional, national and international conferences and symposia are important outlets for students, academics and others who may be involved with similar research. In all cases, drafts intended for publication are required by Forest Service policy to be peer reviewed before submission, even if to a peer reviewed journal. A structured peer, statistical and policy review system ensures Forest Service reports are high quality.

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.

No such approval is being sought.

18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

There are no exceptions to the certification statement identified in item 19 "Certification Requirement for Paperwork Reduction Act.