

The 2013 Supporting Statement for 0596-NEW **Arapaho-Roosevelt National Forest Transportation System** **Alternatives Study**

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 following laws, regulations, and statutes mandate or authorize the collection of information in this study (copies of the appropriate section of each are contained in Appendix A):

- Forest Service Administration Organic Act of 1897 [16 U.S.C. §§ 473-478, 479-482, and 551] as amended by the Transfer Act of 1905 [16 U.S.C. §§ 472, 524, 554]
- Multiple Use Sustained Yield Act of 1960 [P.L. 86-15, § 3]
- Forest and Rangeland Renewable Resources and Planning Act of 1974 [P.L. 93-378 § 3(2,3)] as amended
- National Forest Management Act of 1976 [P.L. 94-588, §§ 2(3), 6(d)], as amended
- Government Performance and Results Act of 1993 [P.L. 103-62] as amended
- Executive Order 12862 of September 11, 1993
- 1997 Revision, Arapaho-Roosevelt National Forest and Pawnee National Grassland Resource Management Plan [Chapter 1, Part 4]
- Executive Order 13571 of April 27, 2011

The Arapaho-Roosevelt National Forest (ARNF) lies in the Front Range of Colorado, a complex of federal land units and population centers, most notably Denver. With its combination of major population centers and adjacent public lands, the area attracts over 23 million recreation visits annually, contributing to the ARNF rating as one of the three most-visited forests in the National Forest System. Previous studies identified three sites within ARNF facing the most immediate transportation system needs, with demand expected to increase with projected regional growth. These sites - 1) Brainard Lake Recreation Area (BLRA), including the Indian Peaks Wilderness (IPW); 2) Guanella Pass (GP); and 3) Mount Evans Recreation Area (MERA) - are connected via major highways to several Front Range population centers. Intense use of these sites is negatively impacting traffic safety, recreation experience, and the natural resources.

The purpose of this project is to collect information that will help the USFS improve transportation conditions, and recreation and resource management on the ARNF. In particular, the survey instruments in this study are designed to collect information about visitors' perceptions, experiences, and expectations, with respect to transportation conditions and services, recreation opportunities, and visitor experience quality at BLRA (including the IPW), GP, and MERA. The information collection is also designed to help identify transportation-related issues experienced by visitors at each of the three recreation sites, and assess

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visitors' opinions about potential changes in operations to modify and improve transportation services and facilities.

Thus, the information collection planned for this project is a key tool for the Agency to obtain information in an efficient, timely manner, for the purposes of improving transportation systems, visitor experience quality, and resource management at the three recreation sites. The survey instruments included in this study are designed to ensure that the results are adequately accurate, reliable, and applicable for their intended purposes - to help the USFS improve transportation conditions, and recreation and resource management on the ARNF.

More specifically, the surveys are designed to primarily address transportation conditions at/within the study sites, but do include some questions that address transportation to the study sites. The surveys have a particular focus on traffic congestion and parking shortages at the study sites during the summer peak visitation period, and potential alternative transportation systems (ATS) strategies to help mitigate and manage these issues. Potential ATS strategies of focus in the surveys include shuttle/transit service to and/or within the study sites; visitor information and Intelligent Transportation Systems (ITS) to manage demand during peak periods; pedestrian and/or bicycle facilities to reduce parking and traffic congestion; and on-the-ground parking and traffic management to optimize the use of existing parking and roadway infrastructure. In addition, the surveys address the potential strategy of using shuttle/transit service to manage the "delivery" of visitors to the study sites, or specific destinations within the study sites, according to crowding capacities for the sites; this is addressed through questions that measure visitors' perceptions and tolerances for crowding.

Thus, this study directly assists the US Forest Service with the following specific aspects of its Mission, Vision, and Guiding Principles, as set forth in law:

Mission

- Listening to people and responding to their diverse needs in making decisions.
- Developing and providing scientific and technical knowledge aimed at improving our capability to protect, manage, and use forests and rangelands.

Vision

- We are recognized nationally and internationally as a leader in caring for the land and serving people.
- We are an efficient and productive organization that excels in achieving its mission.

Guiding Principles

- We use the best scientific knowledge in making decisions and select the most appropriate technologies in the management of resources.

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- We strive for quality and excellence in everything we do and are sensitive to the effects of our decisions on people and resources.
- We promote grassroots participation in our decisions and activities.
- We are responsible and accountable for what we do.
- We recognize and accept that some conflict is natural and we strive to deal with it professionally.

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.)

The study includes one survey, entitled *ARNF Visitor Survey*, and includes a separate version of the survey, adapted to each of the three study areas, plus a version adapted to the IPW in BLRA, for a total of 4 survey instruments: Instrument A through Instrument D.

Instrument A will be administered at BLRA; Instrument B will be administered at GP; Instrument C will be administered at MERA, and Instrument D will be administered at the IPW. Information collected in the survey is as follows:

ARNF Visitor Survey: Respondents will be asked a variety of questions about their visit to the recreation area, travel to the recreation area, perceptions of transportation conditions at the recreation area, preferences for potential transportation options for travel to and within the recreation area, things that may have influenced their trip, the potential effects of advanced information about visitor use and transportation conditions on trip planning decisions, and socio-demographic characteristics. More specifically, primary question topics include:

- Group size.
- Absence/presence of children in the group.
- Number of vehicles in which group traveled to the recreation area.
- Parking location in the recreation area.
- Length of stay (day or overnight).
- Location from which traveled to visit the recreation area.
- Reasons for visiting the recreation area.
- Activities engaged in during visit to the recreation area.
- Locations visited in the recreation area.

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- Perceptions of crowding and transportation conditions during visit to the recreation area.
- Potential effects of advanced information about visitor use and transportation conditions on trip planning decisions.
- Preference for potential alternative transportation options for travel to and within the recreation area.
- Socio-demographic characteristics.

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.

Forest Service will use contractor services to conduct surveys of recreational visitors (18 years of age and older) who visit the study areas during the study period.

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

The purpose of this project is to collect information that will help the USFS improve transportation conditions, and recreation and resource management on the ARNF. In particular, the survey instruments in this study are designed to collect information about visitors' perceptions, experiences, and expectations, with respect to transportation conditions and services, recreation opportunities, and visitor experience quality at BLRA, GP, and MERA. The information collection is also designed to help identify transportation-related issues experienced by visitors at each of the three recreation sites, and assess visitors' opinions about potential changes in operations to modify and improve transportation services and facilities.

Thus, the information collection planned for this project is a key tool for the Agency to obtain information in an efficient, timely manner, for the purposes of improving transportation systems, visitor experience quality, and resource management at the three recreation sites. Results of the study will be incorporated into future resource management and transportation planning for the ARNF, and used to help develop grant applications for transportation improvements at the recreation areas.

It should be noted, there is a concurrent Federal-wide generic clearance initiative for transportation on federal lands ("Collaborative Transportation Studies Generic Clearance"). The Federal-wide generic clearance initiative is heavily relying on learning from the experience of this survey. The US Forest Service and the other Federal Land Management Agencies are doing more long-term strategic thinking and planning on these types of efforts, and trying to strategically build off of and learn from each subsequent effort, in the interest of coordinating efforts, maximizing efficiency, and improving the use of data from these studies.

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Thus, the importance of pre-testing for this study is recognized, and is addressed to the extent possible, given the projects budget limitations. In particular, pre-testing and consultation were conducted with 5 volunteer participants employed by the USFS contractor, and with no specific background or training in survey research methods or analysis (i.e., representative of the general public, rather than survey experts). In particular, the individuals were asked to complete the questionnaire, and asked a series of debriefing questions after to elicit their feedback on the practical utility of the study, questionnaire/respondent burden, quality and clarity of the questionnaires and instructions, and ways to minimize respondent burden. Participants were also asked to indicate if they had any difficulty or confusion with skip patterns, multi-item response scales, and/or instructions for recording responses (e.g., “Check one box” or “Check all that apply”).

The feedback from the pre-test participants was unanimously very positive. Participants mentioned that it was reassuring to have survey administrators nearby, but didn't feel the need to consult them. Participants also indicated that the layout of the questionnaires, and question wording were straightforward, all of which helped to minimize respondent burden. Participants reported that they had no trouble with skip patterns, multi-item response scales, or other instructions for recording responses. In fact, one participant reported, “The skip pattern was very good. I really liked the skip pattern.”

Participants felt that the study had important practical utility, with several comments emphasizing the importance of the information collected in the survey to ensure that people who have spent a great deal of time and planning to visit the USFS recreation areas are not disappointed. Other comments had to do with the importance of the information for planning how to provide information to visitors about parking, visitor use management and other actions to minimize impacts to the quality of visitors' experiences at the study sites due to unexpected circumstances, conditions, or policies.

The time it took each respondent to complete the questionnaire was recorded by the pre-test administrators, and ranged from 8 minutes to 12 minutes, with an average completion time of 10 minutes. This finding helps to validate the burden estimates reported in the submission, and suggests that participation in the study does not cause undue/excessive respondent burden. Finally, the completed questionnaires were inspected by the pre-test administrators, after the pre-test was concluded. Inspection of the completed questionnaires indicated that respondents followed skip patterns correctly, answered all of the relevant questions, and recorded their answers correctly.

Participants in the pre-test offered the following minor suggestions to improve the wording or format of specific questions in the survey instruments, as follows:

1. Specify in the first question about the photos the number of photos that are contained in the three-ring binder, so that respondents can anticipate their progress as they review and answer questions about the photos.
2. Use more concise wording in the question asking respondents to indicate whether or not they think there should be use limits to prevent crowding.

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3. Instruct respondents to record the name of their primary destination/activity, rather than the corresponding letter in the list of locations/activities preceding the question about primary destination/activity to minimize errors and respondent burden.

The survey instruments have been revised to address each of the above comments from the pre-test participants as follows:

1. Instructions preceding the first question about the study photos were revised to:

For the next set of questions, we would like you to look at a series of five (5) photographs of visitor use on the summit of [NAME OF SUMMIT]. Please ask the surveyor to show you the study photos and then answer the questions in this section.

2. The question asking respondents to indicate whether or not they think there should be use limits to prevent crowding were revised to:

Should the daily number of people allowed to hike to the summit of [NAME OF SUMMIT] be limited to prevent crowding, even if it means you might have to change your plans about when to hike? (Check one box.)

Yes

No

3. Questions regarding primary activity and primary destination were revised to:

Which of the activities listed in Question X is your primary activity on this trip to [NAME OF SITE]? (Write in the primary activity or check the box.)

Primary activity: _____

OR

I do not have a primary activity on this trip to [NAME OF SITE].

Which of the locations listed in Question X is your primary destination on this trip to [NAME OF SITE]? (Write in primary destination or check the box.)

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Primary destination: _____

OR

I do not have a primary destination on this trip to [NAME OF SITE].

Moreover, while field-based pre-testing of the questionnaires included in this project aren't possible, given budget constraints, the vast majority of the questions have been pre-tested and administered in other previous OMB-approved studies. Pre-testing in previous studies was conducted when budgets allowed, and in the case of initial/early applications of the questions. The vast majority of the questions in this study have been used in previous studies, and are correspondingly "field-tested" by virtue of their application in previous studies. Each question in the questionnaires that has been pre-tested and administered in a previous OMB-approved study has been labeled as such and the OMB control number included. The few questions that have not been previously approved by OMB and "field-tested" by virtue of their application in previous studies are labeled in the questionnaires as being new to this study.

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 via onsite intercept surveys with visitors at the completion of their trips to the study areas. The survey instruments will be available to respondents in hard-copy only. The survey instruments will be handed to respondents, and they will complete them in writing. To ensure that questionnaires are administered only to exiting visitors, survey administrators will be stationed at locations where it is self-evident when visitors are leaving (i.e., area adjacent to exit lane; parking lots; and trailheads). Moreover, survey administrators will verify with potential respondents that they are in fact exiting the study site.

Ideally, respondents would be offered a choice to complete a hard copy of the questionnaire onsite, or complete the questionnaire via internet at a later time. However, a web-based option is not feasible within the project budget. Moreover, administering the survey as an onsite intercept helps to reduce recall bias by asking respondents questions about their visit in situ and immediately following their visit to the study sites. Further, administering the surveys via multiple modes (onsite hard copy and offsite internet) raises issues, in terms of comparability of onsite-based and internet-based survey results and ability to compile data for analyses.

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Survey administrators will administer surveys to multiple respondents simultaneously, to the extent they are able to do so and manage other aspects of the survey administration process (e.g., present maps). Several methods will be used to facilitate this process. For example, the surveys in this study include reference to maps of the study sites and/or surrounding region, and the survey administrators will have laminated versions of the reference maps readily available for respondents' use, as needed. Thus, respondents will be able to use the maps independently, while still being able to ask the survey administrators questions about the maps, as needed. Similarly, some questions in the surveys reference photos depicting varying levels of visitor use. Laminated copies of the study photographs will be displayed in three-ring binders, thus, respondents will be able to reference the photos independently, while still being able to ask the survey administrators questions about the photos, as needed. Further, it should be noted that only three of the survey instruments contain questions about the study photos, and in each case, there is only one question that references the study photos. Thus, the level of effort associated with the study photos is very small for both the survey administrator and respondent.

Furthermore, the temporal pattern of visitor arrivals and departures at the three study sites is very similar to that in the locations where other similar previous studies were conducted, using the same intercept and survey administration methods. These include studies at Yosemite National Park (OMB #: 1029-0220 and OMB #: 1024-0224); Rocky Mountain National Park (OMB #: 1024-0224; NPS #: 08-028); and Mount Rainier National Park (OMB #: 1024-0224). In particular, most departures occur over a six to eight hour period, from late morning through late afternoon/early evening. This pattern of departures helps with sampling efficiency and effectiveness, as evidenced by very high response rates in previous similar studies, ranging from 60% to 80% or higher. There has been no indication during onsite observations of survey sampling and administration in these previous studies of issues for data collection. Moreover, the focus of this study is on transportation and visitor use conditions during peak periods. The fact that the vast majority of visitor departures during peak periods occur during a six to eight hour window of time allows for an efficient sampling strategy, by eliminating the need for coverage of 12 to 24 hour days, with sampling stratification by hours of the day.

That being said, a trial period of survey administration will be conducted prior to actual survey administration, to identify any unanticipated logistical or other issues, and maximize data quality. In particular, a one-day trial period of survey administration will be conducted at each study site and sampling location. After each trial-period respondent completes the questionnaire, the survey administrators will conduct a debriefing interview with them. During the debriefing interviews, respondents will be asked to indicate if they experienced any confusion with questions, question wording, survey instructions, and/or survey format (e.g., skip patterns, multi-item response scales). In addition, the survey administrators will note the number of completes per hour, which will be used to determine if stratification by time of day is necessary.

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e. How frequently will the information be collected?

This information will only be collected once for each visitor group contacted during the study period, thus, each completed questionnaire will represent one visit to the study area. After the onsite survey is completed, no further contact occurs with respondents and they do not participate in further surveys. To do this, survey administrators will ask visitors they contact if they previously completed a questionnaire at any of the three study sites, and if so, will thank them for their time and send them on their way.

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

The collected information will be included in a management report prepared using contractor services for the USFS. Results may also be published in scientific journals and/or as presentations at professional meetings and conferences by USFS and/or its contractors. Further, the study data and reports will be made publicly available; specifically, a link to the study data and reports will be posted on the ARNF website. In addition, as part of the Federal Land Management Agencies' Collaborative Transportation Studies Generic Clearance, a database will be developed to compile results from studies at various study locations. Once the database is online and operational, the data from this study will be deposited into the database. Ultimately, a meta-analysis of previous, similar studies, including those that get compiled with the database for the Federal Land Management Agencies' Collaborative Transportation Studies Generic Clearance would be plausible and productive. However, a meta-analysis of this type is beyond the scope and budget of this project.

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

This is a new information collection.

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.

Ideally, respondents would be offered a choice to complete a hard copy of the questionnaire onsite, or complete the questionnaire via internet at a later time. However, the possibility of having prospective respondents participate in a computer-based collection is not practical given the remote location of the recreation areas where the surveys will be administered. In addition, a web-based option is not feasible within the project budget. Moreover, administering the survey as an onsite intercept helps to reduce recall bias by asking respondents questions about their visit in situ and immediately following their visit to the study sites. Furthermore, administering the surveys via multiple modes (onsite hard copy and offsite internet) raises issues, in terms of

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comparability of onsite-based and internet-based survey results and ability to compile data for analyses.

In either case, nearly all of the survey questions, including those with skip patterns and “embedded directions”, have been field tested in other similar previous studies, including debriefing interviews with respondents to identify confusing instructions, questions, or question wording. These include studies at Isle Royale National Park (OMB #: 1024-0224); Yosemite National Park (OMB #: 1029-0220 and OMB #: 1024-0224); Rocky Mountain National Park (OMB #: 1024-0224; NPS #: 08-028); and Mount Rainier National Park (OMB #: 1024-0224). Results of these previous pre-tests, debriefing interviews, and corresponding data collections suggest the collection instruments do not cause inordinate respondent burden. For example, during debriefing interviews, very few people have expressed issues about confusing instructions, questions, or question wording, and in fact, pre-test and study respondents commonly report that the questionnaires are straightforward, interesting, and a welcome opportunity to provide input.

Moreover, and as noted, while field-based pre-testing is not possible in this project, due to budget limitations, pre-testing and consultation were conducted with 5 volunteer participants employed by the USFS contractor, and results of this suggest completing the survey questionnaires does not cause undue respondent burden.

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.

Despite intensive visitor use and associated impacts to transportation conditions, visitor experience, and forest resources on the ARNF, there have been no previous studies of visitors’ perceptions, experiences, and expectations, with respect to transportation conditions and services, recreation opportunities, and visitor experience quality at the study sites. Moreover, there have been no previous visitor survey research studies to collect empirical information about transportation-related issues experienced by visitors at each of the three recreation sites, and assess visitors’ opinions about potential changes in operations to modify and improve transportation services and facilities.

National Visitor Use Monitoring (NVUM) studies have been conducted at BLRA, GP, and MERA, however, the focus of these studies has been on general visitor use information designed to provide forest-level data on trends in visitor use and user characteristics. Thus, there is no overlap in purpose between the NVUM studies and this information collection.

In addition, the questions and questionnaires in this study are very similar to those administered at other federal lands units; however, they are tailored, in important ways, to the specifics of each of the study sites. For example, questions about parking locations, destinations visited, activities, travel routes to the sites, etc. are site-specific, and consequently, it is not possible to extrapolate from other studies the results for these types of questions to the study sites. Even for questions that do not have site-specific wording or details in the

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questions themselves, it is not suitable to extrapolate results from other studies to the study sites, because the responses are context-specific. For example, results from other studies of questions about visitor demographics, number of children in groups, and group sizes are a function of each study sites' geography (e.g., urban-proximate versus remote), primary activities/destinations (e.g., scenic driving versus mountain climbing), and other contextual factors. Thus, this study is similar to other previous studies, in terms of its focus on addressing impacts of peak season visitation (e.g., traffic congestion, parking shortages, visitor crowding), but differs in terms of site-specific characteristics (parking lot locations and names, destinations/attractions, travel routes to the sites, etc.) and context (geography, visitor attractions/primary types of activities, etc.).

Further, previous studies and their recommendations regarding potential alternative transportation strategies for the three study sites were reviewed, analyzed, and documented in a preliminary study that served as a foundation for this project. A report was produced from this preliminary phase of work, documenting transportation-related issues and potential strategies to improve transportation conditions at the study sites. The information contained in the study completion report served to focus and guide the design of the surveys. The preliminary study report and corresponding data collection plan for this study are included with this submittal for reference. Moreover, USFS elicited input from stakeholders on the project itself, the issues it is intended to address, potential strategies to improve transportation conditions at the study sites, and the survey instruments themselves.

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.

As noted, intensive visitor use at BLRA, GP, and MERA are threatening the resource and recreation management objectives for these areas, as specified in the ARNF Land and Resource Management Plan.

Previous planning studies have recommended alternative transportation strategies to help minimize the impact of intensive visitor use on forest resources and visitor experience quality, however, the feasibility and public acceptability of these recommendations has not yet been analyzed. Consequently, the USFS has not yet been able to implement transportation improvements that would help meet the resource and recreation management objectives for these areas. As noted, these previous studies studies have served as the foundation upon which this study's purpose and methods (including survey instruments) have been designed. Moreover, USFS has engaged stakeholders throughout the process, as noted.

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Furthermore, the ARNF is an urban forest with one of the highest visitation rates in the U.S. Forest Service system. The State of Colorado estimates the metropolitan population base adjacent to this Forest (the Front Range, or Fort Collins/Denver/Colorado Springs/Pueblo) will double by 2040. While limiting use is being considered in some locations, these study sites are extremely popular for a variety of reasons, and limiting use could create greater dispersed recreation activity, which is very difficult to manage. Therefore, information about people's perceptions of and tolerances for impacts (traffic congestion, parking shortages, crowding, etc.), along with their opinions about the acceptability of actions to help mitigate issues is critical information for making judgments about limiting or otherwise managing visitor use. The surveys include questions to collect data of this nature, which would provide USFS with a quantitative, empirical basis to help support and inform difficult judgments about visitor use management and potential use limits. Without the information from the surveys, difficult decisions about use limits or other visitor use/transportation management actions would be at greater risk of not withstanding public and legal scrutiny. As the reviewer noted, public and stakeholder meetings are also a critical component of making informed judgments; however, they offer a complementary form of input to visitor surveys, in that they elicit input audiences or publics other than just those who visit the study sites. However, information gathered via public and stakeholder meetings are subject to a number of potentially biases related to various publics' ability and willingness to attend public meetings, and are not designed to collect information that is statistically reliable for generalizing to any particular population or segment of the population. Moreover, many visitors to the study sites are not residents of the Denver metropolitan area or Colorado more generally. Consequently, public and stakeholder meetings would have very limited capacity to collect input from visitors to the study sites, other than those that live locally and choose to attend. Thus, the strongest combination of public input for challenging decisions that require public acceptance is public and stakeholder meetings, combined with quantitative, empirical data of the nature this study is designed to measure.

To ensure an efficient and effective information collection, a data collection plan was developed for this project, including description of survey questionnaires and questions, in relation to study objectives; the data collection plan is included with this submission. In addition, Topic Area labels were added to each question in the questionnaires to indicate the topic area of the question and corresponding project/measurement objective using the following Topic Areas and project objectives:

Topic Area 1-Visitor and Trip Characteristics: Questions in Topic Area 1 address the project's objectives to understand visitors' personal and group characteristics and visitors' trip characteristics, including trip planning and travel to and within the study sites.

Topic Area 2-Perceptions and Evaluations of Transportation-related Conditions: Questions in Topic Area 2 address the project's objective to understand visitors' perceptions of and tolerances for transportation-related impacts (e.g., traffic congestion, parking shortages) at the study sites.

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Topic Area 3-Crowding and Visitor Experience Quality: Questions in Topic Area 3 address the project's objective to understand visitors' perceptions of and tolerances for crowding-related impacts to visitor experience quality at the study sites.

Topic Area 4-Attitudes and Opinions about Services, Facilities, and Management: Questions in Topic Area 4 address the project's objectives to understand visitors' opinions about the acceptability of actions to: 1) improve transportation facilities, services, and conditions at the study sites; and 2) help mitigate transportation- and visitor experience-related impacts at the study sites.

Topic Area 5-Transportation-related Preferences: Questions in Topic Area 5 address the project's objective to understand visitors' preferences for existing and potential transportation systems, services (including advanced traveler information for trip planning), and facilities.

It should be noted, while the questions and questionnaires in this study are very similar to those administered at other federal lands units, they are tailored, in important ways, to the specifics of each of the study sites. In particular, this study is similar to other previous studies, in terms of its focus on addressing impacts of peak season visitation (e.g., traffic congestion, parking shortages, visitor crowding), but differs in terms of site-specific characteristics (parking lot locations and names, destinations/attractions, travel routes to the sites, etc.) and context (geography, visitor attractions/primary types of activities, etc.). Thus, it is not suitable to extrapolate results from other studies to the study sites.

While the study certainly carries a cost, including public burden, the practical utility of the study cannot be understated. Transportation systems, operations, and programs are necessary to facilitate public access and visitor enjoyment of our national forests. However, there can be a number of transportation-related impacts to national forest resources and visitor experience quality. For example, the study sites experience intensive visitation during summer months (two of the sites are only open between Memorial Day and Labor Day), and associated with intensive national forest recreational areas visitation are a number of transportation-related impacts, including traffic congestion at entrance points and on recreation area roads, parking shortages and associated visitor frustration, and resource impacts from unendorsed parking. For example, results of parking counts conducted at the study sites during summer 2012 suggest that on a "typically busy" (but not even the busiest) peak summer season day, all of the parking lots at Guanella Pass are filled beyond capacity by 9 AM, and by mid-day, there are nearly twice as many cars (231 vehicles) parked in unendorsed areas on the roadside than in designated parking spaces. While preliminary ATS strategies to improve transportation at the study sites have been developed in previous studies, at a *conceptual level*, the feasibility and impact on visitors' experiences and forest resources have not been evaluated. Moreover, previously proposed ATS strategies could unintentionally "deliver" more visitors to the study sites than they can accommodate, without unacceptable impacts to visitors' experiences (e.g., crowding) and forest resources (e.g., trampling).

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impacts to soils and vegetation). This is a particularly salient issue at the study sites, where visitor crowding is already a significant issue. For example, visitor use counts were conducted on the summits of Mt. Evans and Mt. Bierstadt (the primary visitor destinations at Mount Evans Recreation Area and Guanella Pass, respectively) during summer 2012. Results of the visitor use counts indicated that on “typically busy” (but not the busiest) days, the density of people on the summits is equivalent to a “Pedestrian Level of Service C” (capacity metric for pedestrian areas in the *Highway Capacity Manual*, which is the authoritative reference for capacity analysis in transportation planning). This density of people is considered, according to the *Highway Capacity Manual*, to constitute a moderate level of crowding in an *urban* environment, such as on a city sidewalk. While there aren’t similar standards of pedestrian capacity for outdoor recreation and wilderness areas, conditions akin to a moderately crowded city sidewalk suggest extreme crowding in an outdoor recreation and wilderness setting. Thus, transportation planning, management, and operations are inextricably linked to visitor use and visitor experience quality at the study sites. The package of surveys included in this study are designed to examine the impacts of transportation on visitor experience quality and visitors’ perceptions of and attitudes about managing transportation-related impacts at the study sites. The results of this study will provide critical information for USFS to identify feasible, publicly acceptable strategies and actions to improve transportation systems and operations in a manner that is consistent with USFS management objectives for quality visitor experiences and resource protection.

Moreover, lessons learned from the implementation of this survey will be included in the concurrent Federal wide generic clearance initiative (“Federal Land Management Agencies’ Collaborative Transportation Studies Generic Clearance” project currently in development). In this way too, the study has a high degree of practical importance, with benefits substantively outweighing costs/burden.

Further, a meta-analysis of previous studies would be plausible and productive. However, a meta-analysis of previous studies is beyond the scope and budget of this project. Moreover, it is not possible to extract from previous studies what percentages of visitors visited site-specific destinations within the study sites and their corresponding perceptions of transportation-related issues, visitor crowding, etc. from studies at other locations. For example, perceptions of crowding at Mount Evans are assumed to be a function of transportation and visitor use conditions at specific sites visited in Mount Evans, and can’t be extrapolated from visitors’ experiences at Mariposa Grove in Yosemite National Park, or Paradise Meadows in Mount Rainier National Park. These are site-specific, context-dependent issues and corresponding survey questions that can be adapted from one-study site to another, but whose results are not transferable from one place to another. In addition, the study populations are different across studies; the population of visitors to Yosemite National Park, for example, might be expected to have a higher proportion of international visitors and long-distance domestic visitors than the study sites in this study.

In summary, without this study, the USFS will continue to lack the information necessary to identify and implement feasible, publicly acceptable transportation

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improvements that help protect forest resources and visitor experiences as required by the ARNF Land and Resource Management Plan. Thus, without this information collection, impacts to forest resources and visitor experience quality will continue unabated and the USFS will struggle to meet its resource and recreation management mandates for the ARNF. Therefore, the study has important practical utility to the Federal Government, generally, and the US Forest Service in particular in the furtherance of its mission to "...sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations".

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.**

Due to the nature of such in-field visitor surveys, and according to peer-reviewed methods for onsite intercept visitor surveys, respondents will be handed copies of the survey instruments and complete their responses in writing. There are no other special circumstances. The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

Moreover, this study uses peer-reviewed methods that are considered state-of-practice within social science and survey research applications for outdoor recreation management in protected natural areas. The methods used in the study are established as peer-reviewed, state-of-practice in the leading texts

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on social science and survey research applications for outdoor recreation management, including:

Sirakaya-Turk, E., Uysal, M., Hammit, W., & Vaske, J. (2011). *Research Methods for Leisure, Recreation, and Tourism*. CABI Publishing: London, UK.

Manning (2010). *Studies in Outdoor Recreation, 3rd Edition*. Corvallis, OR: Oregon State University Press.

Vaske, J. J. (2008). *Survey research and analysis: Applications in parks, recreation and human dimensions*. State College, Pennsylvania: Venture Publishing Inc.

In addition, there are more than three decades of peer-reviewed studies that have applied the same survey design and administration methods proposed in this submission, a few recent examples of which are listed below. All of the publications listed have been reviewed and accepted as presenting scientifically sound research methods, results, and conclusions by experts in the field of social science and survey research applications for outdoor recreation management and/or transportation planning in protected natural areas.

White, D. D., Tschuor, S., & Byrne, B. (2012). Assessing and modeling visitors' evaluations of park road conditions in Yosemite National Park. *George Wright Forum*, 29(3), 308-321.

Anderson, L., R. Manning, C. Monz, and K. Goonan. 2012. Indicators and Standards of Quality for Paddling on Lake Champlain. *Journal of Great Lakes Research* 38:150-156.

Marin, L., P. Newman, R. Manning, J. Vaske, and D. Stack. 2011. Motivation and Acceptability Norms of Human-Caused Sound in Muir Woods National Monument. *Leisure Sciences* 33(2): 147-161.

Needham, M. D., Szuster, B. W., & Bell, C. M. 2011. Encounter norms, social carrying capacity indicators, and standards of quality at a marine protected area. *Ocean and Coastal Management*, 54(8): 633-641.

van Riper, C., R. Manning, and N. Reigner. 2010. Perceived Impacts of Outdoor Recreation on the Summit of Cascade Mountain, New York. *Adirondack Journal of Environmental Studies* 16(1).

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Brown, R. N. K.*, Rosenberger, R. S., Kline, J. D., Hall, T. E., & Needham, M. D. (2008). Visitor preferences for managing wilderness recreation after wildfire. *Journal of Forestry*, Jan/Feb, 9-16.

Vaske, J. J., & Shelby, L. B. (2008). Crowding as a descriptive indicator and an evaluative standard: Results from 30 years of research. *Leisure Sciences*, 30, 111-126.

White, D. D., Virden, R. J., & van Riper, C. J. (2008). Effects of place identity, place dependence, and experience-use-history on perceptions of recreation impacts in a natural setting. *Environmental Management*, 42, 647-657.

Bullock, S. * & Lawson, S. (2008). Managing the "Commons" on Cadillac Mountain: A stated choice analysis of Acadia National Park visitors' preferences. *Leisure Sciences*, 30(1), 71-86.

Bullock, S. * & Lawson, S. (2007). Examining the potential effects of management actions on visitor experiences on the summit of Cadillac Mountain, Acadia National Park. *Human Ecology Review*, 14(2), 140-156.

Lawson, S., Roggenbuck, J., Hall, T., & Moldovanyi, A. (2006). A conjoint analysis of preference heterogeneity among subgroups of Okefenokee Wilderness visitors. *Journal of Leisure Research*, 38(4), 575-600.

- 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 December 12, 2012, on page number 73974. Two comments were received. One asked to be added to our mailing list for study documents, which we did. The other stated the information collection was unnecessary, was too expensive, that visitors should provide their own transportation, that the study should be shut down, and that the population growth projections were skewed, biased, and inaccurate. We responded that the information collection was necessary so we could better serve the public in the future.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of

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instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Proponents contacted university faculty and 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 instruments, and to comment on all aspects of data collection, including complexity of questions and the value of each question proposed.

Reviewers/Commenters:

- Dr. Peter Newman (regional university faculty with experience and interest in federal public lands issues in Colorado), Colorado State University, Fort Collins, CO;
- Dr. Christopher Monz (regional university faculty with experience and interest in federal public lands issues in Colorado), Utah State University, Logan, UT;
- Boulder County Department of Parks and Open Space;
- Boulder County Transit Department;
- Federal Highway Administration - Central Federal Lands/Highway Division/Transportation Planning Team.

Additionally, extensive consultation was conducted with Federal managers at the ARNF and FHWA-CFL. 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, usefulness of some questions, and redundancy of information collected by some questions. In response, some survey questions were modified or deleted, three surveys for each site were combined into one survey per site plus one for the Wilderness Area, and in some cases explanations were returned to the commenter explaining the rationale and/or survey science behind some of the questions and information collection strategies (for example, seemingly redundant questions).

In addition and as noted, pre-testing and consultation were conducted with 5 volunteer participants employed by the USFS contractor, and with no specific background or training in survey research methods or analysis (i.e., representative of the general public, rather than survey experts). In particular, the individuals were asked to complete the questionnaire, and asked a series of debriefing questions after to elicit their feedback on the practical utility of the study, questionnaire/respondent burden, quality and clarity of the questionnaires and instructions, and ways to minimize respondent burden. Participants were also asked to indicate if they had any difficulty or confusion with skip patterns, multi-item response scales, and/or instructions for recording responses (e.g., "Check one box" or "Check all that apply").

The feedback from the pre-test participants was unanimously very positive. Participants mentioned that it was reassuring to have survey administrators

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nearby, but didn't feel the need to consult them. Participants also indicated that the layout of the questionnaires, and question wording were straightforward, all of which helped to minimize respondent burden. Participants reported that they had no trouble with skip patterns, multi-item response scales, or other instructions for recording responses. In fact, one participant reported, "The skip pattern was very good. I really liked the skip pattern."

Participants felt that the study had important practical utility, with several comments emphasizing the importance of the information collected in the survey to ensure that people who have spent a great deal of time and planning to visit the USFS recreation areas are not disappointed. Other comments had to do with the importance of the information for planning how to provide information to visitors about parking, visitor use management and other actions to minimize impacts to the quality of visitors' experiences at the study sites due to unexpected circumstances, conditions, or policies.

The time it took each respondent to complete the questionnaire was recorded by the pre-test administrators, and ranged from 8 minutes to 12 minutes, with an average completion time of 10 minutes. This finding helps to validate the burden estimates reported in the submission, and suggests that participation in the study does not cause undue/excessive respondent burden. Finally, the completed questionnaires were inspected by the pre-test administrators, after the pre-test was concluded. Inspection of the completed questionnaires indicated that respondents followed skip patterns correctly, answered all of the relevant questions, and recorded their answers correctly.

Participants in the pre-test offered minor suggestions to improve the wording or format of specific questions in the survey instruments, and, as described in detail above, revisions to the questionnaires were made accordingly.

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.

Future visitors of the study areas cannot be identified in advance of the survey in order to obtain their views.

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.

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At the beginning of each onsite intercept survey, the respondent will be informed that their responses to the questions being asked are voluntary and anonymous, will be kept secure, and used only for the purposes of the study. Names and addresses of respondents will not be recorded. Thus, the surveys are anonymous, and no personally identifiable information will be recorded in this study.

- 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 are related only to visits to the study areas. However, respondents are asked to indicate their gender, level of formal education, race, and ethnicity. These questions are taken directly from the US Census and are included to establish an empirical understanding of the segments of society being served by these federal services and how that corresponds to the socio-demographic characteristics of the local, regional, and national population.

Survey administrator staff will be instructed to tell respondents they may decline to answer any questions. All who decline to complete the questionnaire will be asked if they could answer just a few questions that would take less than a minute; if they say no to this, they'll be thanked and sent on their way. All who decline to complete the questionnaire, whether they agree or not to answer the three short "non-response questions" will be treated as refusals in computation of response rates. Information about the procedure and script survey administrators will use for these questions is in Supporting Statement B of this submission. The information collected in this step is necessary to support a robust test for non-response bias, by allowing for comparison of respondent and non-respondents on not only observable characteristics (e.g., group size, presence of children), but other characteristics that require elicitation via question and answer (e.g., state of residence, primary activity).

- 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.**

It should be noted, the annual burden estimate in Table 1 is based on results from previous similar studies noted in response to other comments. The burden estimate includes time to

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administer the respondent recruitment script.

Table 1 - Annual Burden

(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)
BLRA Pre-test - Initial Contact	N/A	35	1	35	1 minute	0.5 hours
BLRA Pre-test - Response	N/A	25	1	25	20 minutes	8 hours
BLRA Pre-test - Non- response questions	N/A	10	1	10	1 minutes	0.5 hours
BLRA Visitor Survey - Initial Contact	N/A	425	1	425	1 minute	7 hours
BLRA Visitor Survey - Response	N/A	300	1	300	10 minutes	50 hours
BLRA Visitor Survey - Non-response questions	N/A	90	1	90	1 minutes	1.5 hours
GP Pre-test - Initial Contact	N/A	35	1	35	1 minute	0.5 hours
GP Pre-test - Response	N/A	25	1	25	20 minutes	8 hours
GP Pre-test - Non- response questions	N/A	10	1	10	1 minutes	0.5 hours
GP Visitor Survey - Initial Contact	N/A	425	1	425	1 minute	7 hours
GP Visitor Survey - Response	N/A	300	1	300	10 minutes	50 hours
GP Visitor Survey - Non-response questions	N/A	90	1	90	1 minutes	1.5 hours
MERA Pre-test - Initial Contact	N/A	35	1	35	1 minute	0.5 hours
MERA Pre-test - Response	N/A	25	1	25	20 minutes	8 hours

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(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)
MERA Pre-test - Non-response questions	N/A	10	1	10	1 minutes	0.5 hours
MERA Visitor Survey - Initial Contact	N/A	425	1	425	1 minute	7 hours
MERA Visitor Survey - Response	N/A	300	1	300	10 minutes	50 hours
MERA Visitor Survey - Non-response questions	N/A	90	1	90	1 minutes	1.5 hours
IPW Pre-test - Initial Contact	N/A	35	1	35	1 minute	0.5 hours
IPW Pre-test - Response	N/A	25	1	25	20 minutes	8 hours
IPW Pre-test - Non-response questions	N/A	10	1	10	1 minutes	0.5 hours
IPW Visitor Survey - Initial Contact	N/A	425	1	425	1 minute	7 hours
IPW Visitor Survey - Response	N/A	300	1	300	10 minutes	50 hours
IPW Visitor Survey - Non-response questions	N/A	90	1	90	1 minutes	1.5 hours
Totals	---	1,700	---	3,540	---	270 hours

- **Record keeping burden:**
There is no record keeping requirement for respondents.
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 2 - Estimated Annualized Cost to Respondents

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(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
BLRA Pre-test - Initial Contact	0.5 hours	\$23.41	\$12
BLRA Pre-test - Response	8 hours	\$23.41	\$187
BLRA Pre-test - Non-response questions	0.5 hours	\$23.41	\$12
BLRA Visitor Survey - Initial Contact	7 hours	\$23.41	\$164
BLRA Visitor Survey - Response	50 hours	\$23.41	\$1,171
BLRA Visitor Survey - Non-response questions	1.5 hours	\$23.41	\$35
GP Pre-test - Initial Contact	0.5 hours	\$23.41	\$12
GP Pre-test - Response	8 hours	\$23.41	\$187
GP Pre-test - Non-response questions	0.5 hours	\$23.41	\$12
GP Visitor Survey - Initial Contact	7 hours	\$23.41	\$164
GP Visitor Survey - Response	50 hours	\$23.41	\$1,171
GP Visitor Survey - Non-response questions	1.5 hours	\$23.41	\$35
MERA Pre-test - Initial Contact	0.5 hours	\$23.41	\$12
MERA Pre-test - Response	8 hours	\$23.41	\$187
MERA Pre-test - Non-response questions	0.5 hours	\$23.41	\$12

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(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
MERA Visitor Survey - Initial Contact	7 hours	\$23.41	\$164
MERA Visitor Survey - Response	50 hours	\$23.41	\$1,171
MERA Visitor Survey - Non-response questions	1.5 hours	\$23.41	\$35
IPW Pre-test - Initial Contact	0.5 hours	\$23.41	\$12
IPW Pre-test - Response	8 hours	\$23.41	\$187
IPW Pre-test - Non-response questions	0.5 hours	\$23.41	\$12
IPW Visitor Survey - Initial Contact	7 hours	\$23.41	\$164
IPW Visitor Survey - Response	50 hours	\$23.41	\$1,171
IPW Visitor Survey - Non-response questions	1.5 hours	\$23.41	\$35
Totals	270 hours	---	\$6,324

The estimated cost for information collection is based on the average mean national rate for all salaries, \$23.41 per hour, from the Bureau of Labor News Release for the month of May 2012, <http://www.bls.gov/news.release/pdf/realer.pdf>.

- 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.**

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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 is designed to 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.

It should be noted, the costs of study planning and traffic data collection are included in the cost estimate in Table 3. In addition, activities conducted by Federal employees associated with the cost estimate in Table 3 include participation in conference calls to assist with survey instrument design, review of survey instruments and data collection procedures, preparing request for OMB clearance, logistics planning to support data collection, review of study completion report, project meetings/conference calls to incorporate findings into development of strategies/alternatives to improve transportation at the study sites, and contract administration.

Table 3 - Estimated Cost to the Government

ACTION ITEM	PERSONNEL	GS LEVEL	HOURLY RATE*	HOURS	Total
Contractor Services, including at least: developing, printing, storing forms - labor and materials; collecting information - labor and materials; analyzing, evaluating, summarizing, and reporting - labor and materials					\$80,000
FHWA-CFLHD: Coordination among Project Manager, Contractor, and USFS	1	13	\$48	10	\$480
USFS: Coordination between Project Manager, Contractor and USFS at Forest level	1	12	\$54	10	\$540
USFS: Coordination onsite between					

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ACTION ITEM	PERSONNEL	GS LEVEL	HOURLY RATE*	HOURS	Total
Contractor and USFS District personnel	4	12	\$44	40	\$1,760
Totals					\$82,780

* Taken from: <http://www.opm.gov/oca/11tables/index.asp>, Cost to Government calculated at hourly wage multiplied by 1.3

The total annual cost to the Federal Government will be approximately **\$82,780**.

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.

Presentations will be made to Forest Supervisors, resource managers, transportation planners and engineers, and stakeholder groups to explain the findings and their implications. One or more manuscripts may be submitted to peer-reviewed journals interested in public lands resource and recreation management issues.

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.

The valid OMB control number and expiration date will be displayed on all information collection instruments.

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

The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.