

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**BACKCOUNTRY USE PERMIT
36 CFR 1.5, 1.6, and 2.10
OMB CONTROL NUMBER 1024-0022**

Terms of Clearance: None.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Backcountry Use Permit (NPS Form 10-404A) is the primary form used to implement a backcountry reservation system and provide access into backcountry and designated wilderness areas where registration is required or limits are imposed in accordance with regulations. Such permitting enhances the ability of the National Park Service (we, NPS) to issue hazard warnings, conduct search and rescue efforts, and provide mission based resource protection.

The objectives of the permit system are to ensure: (1) requests by backcountry users are evaluated by park managers in accordance with applicable statutes and NPS regulations; (2) use of consistent standards and permitting criteria throughout the agency; and (3) to the extent possible, use of a single and efficient permitting document.

In 1976, we initiated a backcountry registration system in accordance with the regulations found at Title 36, Code of Federal Regulations, Sections 1.5, 1.6, and 2.10 (36 CFR 1.5, 1.6 and 2.10). The backcountry use permit system provides users access to backcountry areas of national parks with continuing opportunities for solitude, while enhancing resource protection and providing a means of disseminating public safety messages regarding backcountry travel. The Backcountry Use Permit is an extension of our statutory authority and responsibility to protect the park areas we administer and to manage the public use thereof (Title 16 United States Code, Sections 1 and 3 (16 U.S.C. 1 and 3)). NPS regulations codified in 36 CFR 1-7, 12 and 13, are designated to implement statutory mandates that provide for resource protection and public enjoyment.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

By designating access routes and overnight camping locations, NPS backcountry program managers can redistribute users in response to managing use, high fire danger; snow, water or wind hazard; bear activity; and other situations that may temporarily close a portion of the backcountry. We also use the permit system as a means of ensuring each backcountry user receives up-to-date information on backcountry sanitation procedures, food storage procedures, wildlife activity, trail conditions, and weather forecasts so our concerns for visitor safety are met.

Not all parks will use the form and some parks may collect the information using a nonform format (through discussions in person or over the phone, by sign-in sheet or self-registration system, by email, or by post card). In some instances, respondents will be able to provide information verbally. Because of the span of activities and the different management needs and resources at each park, respondents may not be required to answer all questions. Depending on the requested activity, park staff will have the discretion to ask for less information than

appears on the proposed form. However, park staff may not ask for more or different information. The burden listed in item 12 includes any nonform collection.

Each permittee must file an itinerary showing proposed travel routes and overnight stays. In the event of an overdue hiker or the existence of emergency situations such as wildfires, NPS personnel can locate, warn, treat for injuries, or evacuate users who are in danger from the situation or have become injured or lost.

The backcountry permit collects information on the amount, location, timing and type of backcountry use. The amount of use is measured by the number of people and user nights. The location is indicated by the entry and exit trailheads and travel zone(s). The day of the week and season are shown by the date of entry and exit. The type of use (hiking, boating, stock trip) identifies the method of travel. This information monitors use levels and is necessary in order to identify any impacts to the resources. The collection of this information provides critical information to backcountry managers, which can be used to accomplish mission based resource protection and to assure visitor enjoyment.

The above information will be a vital tool in meeting park objectives and maintaining quality visitor experiences. The information will help:

- Administer and monitor visitor programs and facilities which protect parks.
- Distribute visitor permits to ensure safety of visitors.
- Ensure a quality visitor experience.
- Minimize resource disturbance and ensure the protection of natural, cultural and recreational resources.
- Determine facility, program, personnel and budget needs.

Forms will be provided by the parks and be available at backcountry reservation offices in the parks. Respondents complete the form as they reach the trailhead or backcountry reservation office and before beginning their backcountry hike. A copy is retained by the respondent, and a copy is retained by the park. Backcountry users only need to fill the form out when they enter the backcountry for overnight stays. Day users will not be required to complete the form.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Requested information is unique to each applicant, and no other source is available. The information is collected at the trail head or backcountry reservation office on or near the day the backcountry use starts, so it is not possible to collect the information electronically at this time, and in most forecasted cases. Although, automated backcountry reservation systems may be available at selected parks in coming years. In many areas, direct contact between the applicant and NPS staff is important in order to convey park rules, regulations, safety information and current weather information. Park safety conditions and circumstances can vary throughout the year, and occasionally day by day. There is no other opportunity to collect this information that would ensure uniform presentation of advisories, warnings, and educational material.

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.

We do not collect similar information pertaining to backcountry use.

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

This collection does not impose a burden on small businesses.

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.**

Backcountry users do not present themselves as identifiable park users through any other statistical or visitor contact method. There is no other single opportunity to ensure uniform presentation of advisories, warnings and educational material, or implement a backcountry camper registration system.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
 - * requiring respondents to report information to the agency more often than quarterly;
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - * requiring respondents to submit more than an original and two copies of any document;
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
 - * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

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

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

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

On April 2, 2013, we published in the Federal Register (78 FR 19732) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on June 3, 2013. We received one comment.

The comment was confined to issues at Grand Canyon National Park, specifically the aircraft overflight issue. The commenter suggested that NPS require backcountry permits to be issued to individuals who participate in private scenic air tours over park lands. These excursions are short-term (1 hour or less) flights that originate outside the park. Although the flights often take place over park lands, the NPS does not have authority over airspace, which is under the authority of the Federal Aviation Administration.

In addition to the Federal Register notice, we contacted the following individuals and asked for comments on NPS Form 10-404A. These individuals represented visits to large, medium, and small parks across the nation. The respondents stated that the average time required to fill out the form was 5 minutes, that the questions were reasonable and appropriate, and the form/process was not a burden.

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

We do not make any payments or gifts to respondents.

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

We do not provide any assurance of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature.

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

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

We estimate that we will receive 285,000 annual responses totaling 23,750 burden hours for this collection. We have no way of knowing which parks will use a nonform method to collect the information. Whether they use the form or collect the information by a nonform method, it is an application for a permit. We do have data on how many applications are received and how many permits are issued. Therefore, we have included the burden estimate for nonform collection in the burden for the form. The dollar value of the burden hours is approximately \$716,300.

Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours	Hourly Labor Costs	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden Hours
Application (Form 10-404 and nonform collection)	285,000	5 minutes	23,750	\$21.54	\$30.16	\$716,300
Total	285,000		23,750			\$716,300

* We used the Bureau of Labor Statistics News Release USDL 13-2349, December 11, 2013, Employer Costs for Employee Compensation—September 2013, to estimate average hourly wages and calculate benefits. Table 1 estimates the hourly wage for all workers to be \$21.54. To calculate benefits, we multiplied the hourly wage by 1.4, resulting in an hourly rate of \$30.16.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no nonhour costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The total estimated cost to the Federal Government for this collection of information is \$665,950, based on an estimated 5 minutes spent by employees with each of the estimated

285,000 permits. All information collection is done by individual parks that provide backcountry permits and Park Rangers usually collect the permits.

Action	Position and Grade	Hourly Rate	Hourly Rate including Benefits	Total Annual Hours	Annual Cost
Collecting Information	Park Ranger GS 5/5	\$18.69	\$28.04	23,750	\$665,950
Total					\$665,950

* We used Office of Personnel Management Salary Table 2014-DCB to determine hourly wage rates. We multiplied the hourly rate by 1.5 to account for benefits in accordance with BLS news release USDL 13-2349.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish this information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB Control Number and expiration date on the form.

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

There are no exceptions to the certification statement.