<u>The 2014 Supporting Statement A for OMB 0596-0234</u>

Generic Information Collection Clearance for
National Forest System Land Management Planning

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.**

Section 6 of the National Forest Management Act of 1976 (16 U.S.C.1600 *et seq.*) (NFMA) and implementing regulations 36 CFR 219 (2012 Planning Rule) direct the U. S. Forest Service (the Agency) to revise land management plans for each National Forest System (NFS) unit every 15 years, and to continuously monitor conditions to inform interim or subsequent planning actions. Development of Land Management Plans (LMP) pursuant to the NFMA and the 2012 Planning Rule requires an assessment phase, planning phase, and monitoring phase, all of which are designed to foster a transparent, collaborative and informed planning process.

The planning process defined by the NFMA and the 2012 Planning Rule requires public participation and involvement. As such, the Agency will invite public participation broadly to facilitate public comment and the submission of information that **members of the public** find to be relevant.

To ensure that the Agency can be inclusive of, and responsive to, stakeholder concerns in the development of land management plans, the Forest Service seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on land management planning. By qualitative feedback we mean information that provides useful insights on perceptions and opinions, but are not statistical surveys that yield quantitative results that can be generalized to the population of study.

The NFMA and 2012 Planning Rule require the Agency to provide opportunities to the public to participate in the planning process. Information provided by the public assists the Agency in ensuring that LMPs guide management of NFS lands so that they are ecologically sustainable and contribute to social and economic sustainability. In particular, the rule requires the Agency to identify and consider "relevant, existing" information. Public participation is required at each stage of the planning process – assessment, planning and monitoring.

Although the following are not considered "information" as defined by the Paperwork Reduction Act (PRA) (5 CFR 1320.3(h)), they do represent the vast majority of the ways and methods that will be used by the Agency to obtain information from stakeholders:

- (3) Facts or opinions obtained through direct observation by an employee or agent of the sponsoring agency or through non-standardized oral communication in connection with such direct observations;

- (4) Facts or opinions submitted in response to general solicitations of comments from the public, published in the Federal Register or other publications, regardless of the form or format thereof, provided that no person is required to supply specific information pertaining to the commenter, other than that necessary for self-identification, as a condition of the agency's full consideration of the comment;

- (6) A request for facts or opinions addressed to a single person;

- (8) Facts or opinions obtained or solicited at or in connection with public hearings or meetings;

- (10) Like items so designated by OMB.

Public participation will be sought during all three phases of a plan revision: assessment, planning and monitoring. Typically, NFS units publish general solicitations for comments from the public and hold public meetings. Private information will be considered and become part of the public record if voluntarily provided.

Because the 2012 Planning Rule places strong emphasis on transparency of communication, inclusiveness and active public involvement, the Agency anticipates that NFS units will innovate and develop new techniques that facilitate focused communication, which produces more granular detail on stakeholder goals and concerns related to forest management. The intent of this generic ICR is to provide an efficient avenue for ensuring that innovative communications strategies have an efficient means of obtaining OMB approval in accordance with the Paperwork Reduction Act.

For example, if a forest planning team recognizes that a complex issue is not well understood, focus groups of knowledgeable stakeholders could be designed and convened to ensure that the issue is well understood by the Agency.

Another example of a communication strategy that could be supported by this generic ICR would be the solicitation of comments on specific issues. Although the PRA does not consider facts and opinions submitted "*in response to general solicitation of comments*" ((5 CFR 1320.3(h)(4)) to be "information" , planning for NFS units is complex, and it may be appropriate for public meetings regarding unique resource issues, such as water use, protection of a sensitive area, energy resources or similar issues – as opposed to a general solicitation of comments -- to be held. Such outreach could support an "iterative" approach to land management planning and facilitate productive public input on complex matters.

Additionally, the 2012 Planning rule and Executive Order 12372 require intergovernmental communication both broadly and specifically. Regular and consistent engagement of state, local and tribal governments is an important element of land management planning for NFS units, and for most units, there are more than nine such entities that should be contacted regarding the planning process. In addition to public meetings, to which all such public entities are invited, planning teams may contact jurisdictions adjacent or proximate to NFS units with similar and/or targeted notices, including a notice that planning for a forest unit has begun and that the planning team will be assessing information about 15 resource categories.

This generic information collection is intended to facilitate customer and stakeholder feedback in an efficient, timely manner while at the same time staying in compliance with the PRA. The information collected from our customers and stakeholders will help ensure that the development of land management plans is both transparent and well-informed. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services such as improved LMPs or the implementation thereof. These collections will allow for ongoing, collaborative and actionable communications, and the sharing of applicable information between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

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 2012 Planning Rule specifically states that, outside of basic notification requirements, the responsible official has the discretion to determine the “scope, methods, forum, and timing” of public input. Additionally, the responsible official “…shall encourage participation” of youth, low-income populations and minority populations as well as private landowners w who’s property may be affected by the land management plan. To meet the letter and spirit of the 2012 Planning Rule, line Officers need to be creative about enhancing/supporting public participation. Although we cannot identify every instance and circumstance that may be employed to achieve this public participation, the types of collections that this generic clearance is intended to cover include, but are not limited to:

      - Customer comment cards/complaint forms
      - Small discussion groups

- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)
- Targeted requests for information from state, local and tribal governments, non-profit groups, and other stakeholders
- Quantitative surveys designed to inform development of land management plans
- Other innovative communication strategies designed to facilitate voluntary provision of information by the public to NFS units with minimal burden that may be approved by OMB

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.

Information will be collected from self-identified stakeholders. This may include individuals, including individuals who live or work in or near a national forest, representatives of non-profit interest groups, representatives of state, tribal, or local governments, and representatives of businesses.

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

The 2012 Planning Rule and associated directives guide development of LMPs. Information gathered pursuant to this Generic ICR will be used by NFS units and regions to develop LMPs that provides for “social, economic and ecological sustainability.” (36CFR 219.8). Broad input from each units’ customers and/or stakeholders is needed to inform the sustainability of social, economic and ecological systems. In addition, improving Agency land management plans and procedures requires ongoing assessment of service delivery and planning processes of NFS units and regions. The Agency will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of planning procedures and make improvements in LMPs and service delivery based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy of information, courtesy, inclusiveness, efficiency of planning procedures, and resolution of conflicts among forest users that arise when the NFS unit is developing a LMP. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public.

In addition, information will be used to inform the land management plan. For example, if a community adjacent to a NFS unit informs the responsible official of an historic structure close to the boundary of the forest and that could be affected by NFS actions, the plan could be designed to ensure protection of that resource in relation to NFS actions.

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?

Information will be collected in multiple ways – meetings, forms, non-forms, electronically, face-to-face, over the phone, by mail, and over the Internet. Meetings can include any form of public meeting as well as focus group or meetings in response to requests by individuals and public or private organizations.

e. How frequently will the information be collected?

Although there is no schedule, information collection will occur on a case by case basis in relation to plan revisions for NFS units, which are required every 15 years, and plan amendments, which are more modest efforts that may occur between the 15-year revisions. Line officers, from District Rangers to the Chief, have responsibilities related to the planning directives and development of LMPs for NFS units.

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

All information collected through this ICR will be publicly available, with the exception of information that may be addressed by other statutes or policies, for example, sacred sites. The primary mechanism for sharing information is posting to the website of the relevant NFS unit.

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

This is a new information collection. There are no changes made in response to the publication of the Proposed Directives.

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.

Collections pursuant to this ICR are not limited to any specific information management techniques. Web-based tools and other electronic communication strategies are appropriate and anticipated since public- and private-sector stakeholders often live and work at some distance from the subject forest. The use of emerging technologies can reduce the burden of public participation, especially in remote rural locations, by removing the need to travel long distances at personal expense to participate in forest planning activities. For example, a forest could use LiveMeeting technology to provide an opportunity for a group of stakeholders, not limited to 9 or fewer people, to provide information to the planning team regarding particular uses of the forest planning area.

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 purpose of the generic ICR is to facilitate **voluntary** provision of information by stakeholders to the Forest Service – to allow people to have involvement by providing information and input, at their discretion, on proposed land management plans and revisions to the Agency. Information collected is specific to each management plan or revision, and therefore is not duplicative

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

Small businesses and other small entities may be impacted by this collection of information. The opportunity for input from small business and small entity stakeholders is the same as for all types of respondents, and is strictly voluntary.

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.**

The “Purpose and Need” for the 2012 Planning Rule stated in the Preamble includes: *Provide for a transparent, collaborative process that allows effective public participation*. (77 FR 21164)

The Generic ICR will allow Agency units to develop targeted opportunities for public input. For example, understanding of a specific use conflict in an NFS unit identified during the planning process may be dramatically improved through the use of focus groups. The Generic ICR provides an efficient and timely vehicle for Agency personnel to affirm that specific strategies are acceptable and developed in accordance with the PRA.

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;**

  Although there is no requirement for respondents to furnish a written response, due to the nature of the collaborative process, there may be instances when a respondent will voluntarily furnish information and request that the Agency consider their information or opinions in fewer than 30 days of becoming aware of the opportunity to provide information that they feel is pertinent to the LMP process.
- **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 other 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.**

Notice of the proposed generic ICR was published in the Federal Register on September 30, 2013 volume 78, No. 198, p. 59911, and two comments were received.

No comments were received regarding cost or hour burden, and one comment received was outside the scope of the notice.

Comment: One commenter noted the need to be able to accurately evaluate demand for a variety of services from the National Forest System and that the Forest Service "must be able to collect information using the best social science methods, including … sampling of regional populations."

Response: The proposed generic ICR already addresses quantitative and qualitative research methods.

The second comment was a request from a community organization to become a permanent partner in Land Management Planning for their particular area.

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.

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 circumstances should be explained.

This is a new collection, and as such, there are no persons with whom to consult.

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

Provision of this information is strictly voluntary, and no payment or gifts will be provided.

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

No information covered by a Privacy Act System of Records, Personally Identifiable Information, or other confidential information covered by a statute, regulation, or agency policy will be collected. All information proffered for inclusion in the assessment and planning of LMPs will be publically available on the appropriate NFS unit's website.

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.**

The Agency is required to consult with American Indian Tribes and Alaska Native Corporations, pursuant to consultation requirements of Executive Order 13175, as well as Executive Order 13007 regarding sacred sites. Finally, the 2012 Planning Rule requires responsible officials to request information on "native knowledge, land ethics, cultural issues, and sacred and culturally significant sites." Any information regarding sacred sites may be considered sensitive and, pursuant to EO 13007, will be handled in a manner consistent with USDA policy, as described below.

> "Because of the unique Government-to-Government relationship that exists, the Tribes are not treated like other public agencies, the public, or special interest groups; the Tribes' input is tracked separately and may be treated as confidential and exempt from disclosure under the Freedom of Information Act (FOIA) under certain circumstances." (REPORT TO THE SECRETARY OF AGRICULTURE: USDA Policy and Procedures Review and Recommendations: Indian Sacred Sites, December, 2012)

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)

Total estimated burden for 3-year period is 63,000 hours. See Table 1 for estimate of annual burden hours.

Table 1: Estimate of Annual Burden Hours

(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)
Customer Comment Cards		5000	1	5000	0.2	1000
Small Discussion Groups		1250	1	1250	2	2500
Focus Groups of customers, potential customers or other stakeholders		1250	1	1250	3	3750
Cognitive studies, such		750	1	750	3	2250

(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)
as those used to refine questions or assess usability of a website						
Qualitative customers satisfaction surveys		7500	2	15000	0.1	1500
In-person observation testing		250	1	250	3	750
Targeted request for information from to State, local and tribal governments, non-profits and other stakeholders		1250	2	2500	2	5000
Quantitative surveys designed to inform development of land management plans		7500	1	7500	0.5	3750
Other innovative communication strategies designed to facilitate voluntary provision of information by the public to NFS units with minimal burden that may be approved by OMB		12500	1	500	1	500
Totals	---	37250	---	34000	---	21000

***Assumptions regarding collection activities**

Collection Activity	**Assumptions (25 forest units in revision at any given time)**
Customer comment cards/complaint forms	200 comment cards/forest each year
Small discussion groups	50 participants in small disc groups/year
Focus Groups of customers, potential customers, delivery partners, or other stakeholders	50 focus group participants/year
Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;	30 individuals asked to help refine questions/year
Qualitative customer satisfaction surveys	300 customer satisfaction surveys/year

(e.g., post-transaction surveys; opt-out web surveys)	
In-person observation testing (e.g., website or software usability tests)	10 in-person observation test/year
Targeted requests for information from state, local and tribal governments, non-profit groups, and other stakeholders	Targeted requests for information sent to 50 individuals/year
Quantitative surveys designed to inform development of land management plans	300 individuals surveyed/year
Other innovative communication strategies designed to facilitate voluntary provision of information by the public to NFS units with minimal burden that may be approved by OMB	500 individuals reached through other outreach activities

- **Record keeping burden:**

  There is no record keeping burden placed upon the respondents.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Three-year estimate for cost of proposed collection is $ 1,515,150.00. See Table 2 for annual estimate.

Table 2: Annual Estimated Cost: $ 505,050.00

(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
Customer Comment Cards	1000	$24.05	$24,050.00
Small Discussion Groups	2500	$24.05	$60,125.00
Focus Groups of customers, potential customers or other stakeholders	3750	$24.05	$90,187.50
Cognitive studies, such as those used to refine questions or assess usability of a website	2250	$24.05	$54,112.50
Qualitative customers satisfaction surveys	1500	$24.05	$36,075.00
In-person observation testing	750	$24.05	$18,037.50

(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**
Targeted request for information from to State, local and tribal governments, non-profits and other stakeholders	5000	$24.05	$120,250.00
Quantitative surveys designed to inform development of land management plans	3750	$24.05	$90,187.50
Other innovative communication strategies designed to facilitate voluntary provision of information by the public to NFS units with minimal burden that may be approved by OMB	500	$24.05	$12,025.00

*BLS. U. S. Monthly Data, August 2013.

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**

There is no additional cost to the federal government of collection activities related to land management planning. All collection activities are considered fundamental planning activities and included in planning budgets.

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.

Virtually all information collected during a planning process will be made available on line at the appropriate NFS unit's website. In addition, some material may be included as appendices in plan-related documents including the assessment report.

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.

Due to the various means of collecting the information, many collections will not have any formal collection instrument and therefore the valid OMB control number and expiration date cannot be displayed. The valid OMB control number and expiration date will be displayed on all formal 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 this request complies with 36 CFR 1320.