**SUPPORTING STATEMENT A**

**Visitor use Surveys for the Saint Anthony Sand Dunes Planning Area**

**OMB CONTROL NUMBER 1004-NEW**

**Terms of Clearance:** N/A.

**General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

**Specific Instructions**

**Justification**

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

The Department of the Interior, Bureau of Land Management (BLM) is requesting OMB approval to collect information from visitors at the Saint Anthony Sand Dunes planning area, located in eastern Idaho. The planning area includes lands designated as a Wilderness Study Area (WSA), Special Recreation Management Area (SRMA), and an Area of Critical Environmental Concern (ACEC). Lands with these special designations make up approximately 25% of the project planning area, which is where the majority of recreation use is occurring. The BLM Planning for Recreation and Visitor Services Handbook (H-8320-1) identifies that SRMAs may need additional guidance with complex implementation issues through the development of a Recreation Area Management Plan (RAMP). The RAMP would address implementation issues not specifically addressed in the Medicine Lodge Resource Management Plan (RMP). Information collected would also provide guidance when writing the RAMP that would provide specific direction for on-the-ground implementation of the RMP. The information collected will determine changes in visitor characteristics, including demographics, usage, user conflicts and perspectives toward management programs and facilities.

**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.**

For this new information collection, University of Idaho serves as the lead investigator and would utilize a similar approach the previous studies conducted at the University. Methods would include administering onsite questionnaires to visitors on a stratified random sampling basis as well as distributing mail-back questionnaires (with an online option at <https://uidaho.co1.qualtrics.com/SE/?SID=SV_a4dlglHutfC7x5j>​) to vested interests in the area (e.g., local elected officials, recreation and environmental groups, and visitor who’s contact information we collected during 2014). The questionnaire will include questions regarding information sources about the units, user conflicts, observable resource impacts, feelings toward various resource values, perspectives toward facilities, commercial activities and associated management and basic demographic data including level of education, age, and organizational affiliations. The survey will take place during the summer season when visitation rates are highest.

The BLM will use the new visitor use information as an important measure of the effectiveness of management actions toward the achievement of RMP goals and objectives for the Saint Anthony’s Sand Dunes. The BLM does not anticipate that the collection of information will be burdensome to the visitors. If a visitor finds the survey burdensome, he or she can choose not to participate.

The information will be collected from a stratified random sample of visitors to the Saint Anthony’s Sand Dunes during the summer season when visitation rates are highest. The goal is to implement the survey in 2015. Visitor participation will be entirely voluntary.

The information will assist BLM in addressing RMP monitoring goals and requirements, specifically those that track the effectiveness of recreation and visitor access opportunities. The management goals for the monitoring and evaluation program are to provide the basis for long-term adaptive management and ongoing implementation-level planning and to ensure that direction the authorizing legislation is fulfilled. The survey will evaluate:

* Use levels including timing and extent;
* Demographic characteristics;
* Activity preferences;
* Desired recreation experiences;
* Degree of conflict among users;
* Perspectives toward resource conditions;
* Sources of information about BLM recreational opportunities and management activities;
* Level of awareness regarding regulations; and
* Support for and frequency of commercially permitted activities.

The information will provide BLM with a scientifically credible data source from which to change, adapt or continue with recreation or visitor-related management programs.

The information will be collected via questionnaires that may be completed on-site, via the mail and through on online option. BLM recreation staff and University of Idaho interns will contact visitors at key trailheads according to a predetermined schedule. Visitors encountered will have the option to complete the questionnaire at the time of contact, or elect to have the questionnaire mailed to them or to receive an email with a link to the online version. The survey packet will contain a cover letter, questionnaire and a self-addressed, stamped return envelope. Respondents may return the questionnaire or fill out an on-line version. One week after the initial mail-out, study participants will be mailed a reminder postcard.

Information will be collected over the course of one summer season. Sampling stratification will take into account weekdays, weekends, and holidays. The information may be shared with the Department of the Interior, the Bureau of Land Management, Congress, and other interested parties who request it.

**Question Justification:**

*Question 1 a-e:* BLM would like to know how often people use these locations to access the sand dunes. Estimated use would help justify whether money should be used to develop those points.

*Question 2:*

A: Assists the BLM in understanding whether visitors think additions need to be made to the current BLM-managed campsite and day use access point at Egin Lakes Campground.

B: Assist the BLM in understanding whether visitors would support developing amenities at more remote/undeveloped dune access locations.

C: Assist the BLM in understanding whether visitors would support developing amenities at more remote/undeveloped dune access locations.

D: Assists the BLM in understanding whether visitors support and believe there is a demand for a group site campground on BLM-managed lands. Currently there is no developed group site campground on BLM-managed lands adjacent to the sand dunes.

E. The majority of the dunes are open to motorized recreation. BLM would like to understand whether visitors think there should be an area for non-motorized recreation only during the busy summer months.

F. BLM would like to understand whether visitors support non-motorized trails in a small area adjacent to Egin Lakes Campground. The trails are not located on the open sand but travel through sage brush vegetation. They are perfect for horseback riding and hikers.

*Question 3:*

A and B: BLM would like to get public input on whether the dunes should be better signed. This would include signing hazard features, as well as providing more directional signs so people do not get lost.

C: BLM would like public input on signage leading to the dunes from adjacent communities. BLM would like to understand whether the current signage is sufficient to assist people in getting to the dunes.

*Question 4:*

a-c: BLM would like visitor input on whether they would support vendors at undeveloped or more remote access points to the sand dunes.

D: There is currently a vendor at the Egin Lakes Campground and Day Use Area. BLM would like to understand whether visitors would like to see additional services provided through multiple vendors at Egin Lake Campground.

*Question 5:*

a-e: These questions provide BLM an understanding of whether visitors support organized group permits. In addition, these questions provide BLM a visitor perspective on when the permits should be issued and whether there should be group size limits.

*Question 6:*

This question provides the BLM a visitor perspective on the maximum group size BLM should permit.

*Question 7:*

a-f: These questions provide BLM an understanding of whether visitors support competitive activity permits. In addition, these questions provide BLM a visitor perspective on what type of competitive evens should be permitted, when the permits should be issued, and whether there should be group size limits.

*Question 8:*

This question provides the BLM a visitor perspective on the maximum competitive activity group size that BLM should permit.

*Question 9:*

a-e: These questions provide BLM an understanding of whether visitors support issuing commercial permits. In addition, these questions provide BLM a visitor perspective on what type of commercial permit and when the permits should be issued.

*Question 10:*

a-c: These questions ask the visitor whether they are interested in participating in or paying for particular services/activities that BLM could issue commercial permits for. This question would provide BLM an understanding of whether visitors are interested in these particular activities. BLM have received many business requests relating to the issuing of these types of permits outlined in questions a-c.

*Question 11:*

a. This question provides the BLM a visitor perspective on the maximum number of commercial permits BLM should issue each year.

b. This question provides the BLM a visitor perspective on the maximum number of commercial trips that should be allowed on the sand dunes each day.

c. This question provides the BLM a visitor perspective on the maximum number of participants each commercial trip would be allowed to take.

*Question 12:*

a-c: These questions target whether there are conflicts that exist between types of visitor using the sand dunes. It provides an opportunity for the visitor to respond to whether they experienced a conflict. If they did experience a conflict, this question provides the BLM with information regarding what type of groups the conflicts occurred between, where the conflicts are occurring, what are the conflicts, and what BLM should do to minimize conflicts.

*Question 13:*

This question asks the visitor whether they did feel crowded when the visited the sand dunes. This information could assist BLM with answering capacity questions related to the management of the dunes.

*Question 14:*

This question provides BLM with the visitor perspective on whether they think use needs to be limited on the sand dunes. This information could assist the BLM with answering capacity questions related to the management of the dunes.

*Question 15:*

This question provides BLM with information regarding when they tend to visit the sand dunes. This question is important because if they are experiencing crowding for example, BLM would know when the visitor was at the sand dunes. This information is helpful when making management decisions.

*Question 16:*

This question provides the BLM an idea of what is the average visitor group size. BLM is interested in understanding whether this type of motorized recreation tends to be comprised of larger or smaller groups.

*Question 17-19:*

These questions provide the BLM important information regarding how the visitor received information regarding the sand dunes. BLM is interested in understanding what media avenues should be use to advertise important information like hazards, updated rules and regulations, and seasonal closures. These questions also provide BLM an understanding of what type of information the visitors are interested in in receiving. The results/answers from these questions could help BLM public affairs promote the dunes in the most efficient and cost effective way.

*Question 20:*

This question provides the BLM with an understanding of the exact activities the visitors are participating in during their last visit to the sand dunes. It also provides information on how important each of the accomplished activities is to the visitor. This allows for more informed management decisions for the sand dunes.

*Questions 21-28:*

These questions are demographic questions and are designed to help BLM determine what factors may influence a respondent’s answers, interests, and opinions. Collecting demographic information assists in comparing subgroups to see how responses vary between these groups.

**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.**

The information will be collected by survey in the field, by hard copy mail correspondence, and/or an optional electronic response to the questionnaire via a website. Providing an option to submit an electronic response may increase response rates and streamline data analysis (i.e., reduce time for data transcription from hard-copy to database.)

**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 BLM currently estimates annual visitation and collects anecdotal feedback from visitors, but the information obtained by such methods does not address all the management questions of interest for the Saint Anthony Sand Dunes in a statistically rigorous manner. The proposed survey would provide more credible data upon which to base management decisions.

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

The information is not being collected from small businesses or other small entities, nor does it burden 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.**

If the collection of visitor information is not conducted, the BLM will not be able to manage the Saint Anthony Sand Dunes as effectively as possible to fulfill the goals and actions set forth in the Medicine Lodge RMP. Specifically, the BLM Planning for Recreation and Visitor Services Handbook (H-8320-1) identifies that SRMAs with complex implementation issues should develop a RAMP that would guide management decisions. A visitor use survey is a key tool to understand the visitor/taxpayer’s perspective toward the effects and effectiveness of management programs. Additionally, information collected would assist the BLM in creating an RAMP for the Saint Anthony Sand Dunes. If this information is not collected, BLM would be unable to develop a RAMP for this area.

**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 anticipated circumstances in which the respondents would be required to report this information more often than once a year.

Responses would be requested, but not required, to the field based or mail-back (written) survey as soon as possible after receiving it.

Responses to the original field based or mail-back (written) survey would be requested, but not required. No copies would be requested.

* **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;**

This survey is designed to produce valid, statistically reliable results. The information collected will not include data classification that has not been reviewed and approved by OMB. The information collection does not include a pledge of confidentiality.

There are no special circumstances that would require respondents to submit proprietary trade secret or other confidential information. The collection of information will be 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 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.**

The Federal Register 60-day Notice for this information collection request (80 FR 2967) was published on January 21, 2015. The public comment period expired on March 23, 2015. No public comments were submitted in response to that notice.

A local university professor (Dr. Tammi Laninga, University of Idaho) with extensive expertise and experience in visitor use surveys designed and will implement the survey in consultation with other experts as needed regarding availability of data, frequency of data collection, as well as the type of data to be collected.

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

The Department of the Interior will not provide 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.**

No assurance of confidentiality will be provided.

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

This information collection does not include any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, or other matters commonly considered private.

**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. Instead, this cost should be included under “Annual Cost to Federal Government.”**

Table 12-1, below, shows the BLM’s estimate of the hourly cost burdens for respondents. The mean hourly wages for Table 12-1 were determined using national Bureau of Labor Statistics data at: <http://www.bls.gov/oes/current/oes_nat.htm>. The benefits multiplier of 1.4 is supported by information at <http://www.bls.gov/news.release/ecec.nr0.htm>.

**Table 12-1 – Hourly Cost Calculation**

|  |  |  |
| --- | --- | --- |
| **A.**  **Occupational Category** | **B.**  **Mean Hourly Wage** | **C.**  **Total Mean Hourly Wage**  **(Column B x 1.4)** |
| SOC Code Number 00-0000  All Occupations | $22.33 | $31.26 |

As shown in Table 12-2, below, the estimated reporting burden for this collection is 845 responses and 211 hours. These estimates are based on past surveys conducted by the University of Idaho in similar management areas. Since this visitor use survey will be conducted in a similar manner, these studies serve as a reasonable estimate. The following table details the individual components and estimated hour burdens of this collection.

**Table 12-2 – Estimated Annual Hour and Cost Burdens**

| **A.**  **Activity** | **B.**  **Estimated Number of Responses** | **C.**  **Completion Time Per Response**  **(Minutes)** | **D.**  **Total Hours**  **(Column B x Column C)** | **E.**  **Annual Cost**  **(Column D x $31.26)** |
| --- | --- | --- | --- | --- |
| Sampling Frame 1: On-site visitors: on-site, mail or on-line questionnaires | 420 | 15 | 105 | $3,282 |
| Sampling Frame 2: mail or online questionnaire to vested interests | 425 | 15 | 106 | $3,314 |
| Totals | 845 |  | 211 | $6,596 |

**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.)**

There is no identifiable capital, start-up, operation, maintenance, or other non-hour costs for the respondents.

**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 Federal government will pay for the visitor use survey through a cooperative agreement with the University of Idaho. The estimated budget to conduct the surveys (Table 2) is based on the principal investigator’s experience conducting similar surveys and typical pay rates through the University of Idaho.

**Table 14 – Estimated Annual Cost to the Government**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **A.**  **Expense** | **C.**  **Hourly pay rate**  **($)** | **D.**  **Hourly rate including benefits**  **(14.15% over salary)** | **E.**  **Number of Hours** | **F.**  **Cost**  **($)** |
| **Principal Investigator** | **46.70** | **55.57 (19%)** | **160** | **8,891** |
| **Graduate Student Research Assistants** | **16.72** | **17.22 (3%)** | **980** | **16,876** |
| **Supplies and Services** |  | | | **6,000** |
| **Travel** |  | | | **2,500** |
|  | **Total Direct Costs** | | | **34,267** |
| **University of Idaho Off-campus Overhead Rate** | **26% of Total Direct** | | | **$8,909** |
|  | **TOTAL** | | | **$43,176** |

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

This is a new information collection.

**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.**

Final Reports for the Visitor Use Survey will be produced by the University of Idaho. Copies of the reports, either hard or electronic, will be available upon making a request to the BLM, Upper Snake Field Office.

**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 BLM will display the expiration date of the OMB approval.

**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.