**The 2014 Supporting Statement - Part A for OMB 0596-NEW**

**Interagency Generic Clearance for Federal Land Management Agencies Collaborative Visitor Feedback Surveys on Recreation and Transportation Related Programs and Systems**

1. **Justification**
2. **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 purpose of this Interagency Generic Clearance project is to collect information that will help the signatory Federal Land Management Agencies (hereafter “FLMAs”, including the Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service, Forest Service and Army Corps of Engineers) improve transportation conditions and recreation and resource management on the respective FLMAs and jointly at area, state, regional, and/or national scales. In particular, information collections will be designed to collect information about visitors’ perceptions, experiences, and expectations, with respect to transportation conditions, services, and recreation opportunities at various FLMA locations and across areas that could include multiple locations managed by different FLMAs.

The information collections will be designed to inform a performance based approach, whereby the survey questions may be used to measure specific performance metrics. Through baseline data collections, FLMAs may be able to identify transportation-related issues or problems experienced by users. This data can serve as a valuable input to programmatic transportation improvements and to long-range transportation planning within each of the FLMAs. Following the implementation of improvements, FLMAs may conduct follow-up surveys among users to determine if there has been an improvement in performance.

Section 1119 of P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21) requires the U.S. Secretary of Transportation to implement transportation planning procedures for Federal lands and tribal transportation facilities that are consistent with the planning processes required under sections 134 and 135 of title 23[[6]](http://www.fhwa.dot.gov/map21/guidance/guideflap.cfm%22%20%5Cl%20%22fn06). These processes are based on "3-C" principles: comprehensive, continuous, and cooperative. As described in section 135, under the scope of the planning process (d, 2 (A)), “The statewide transportation planning process shall provide for the establishment and use of a performance-based approach to transportation decision-making ...”

Likewise, Section 1119 of MAP-21 specifies the collection and reporting of data necessary to implement the Federal lands transportation program, the Federal lands access program, and the tribal transportation program in accordance with the Indian Self-Determination and Education Assistance Act ([25](http://www.law.cornell.edu/uscode/text/25) U.S.C. [450](http://www.law.cornell.edu/uscode/text/25/450) et seq.), including—

(i) inventory and condition, and capacity information on Federal lands transportation facilities (including rivers and trail systems) and tribal transportation facilities; and

(ii) bridge inspection and inventory information on any Federal bridge open to the public.

In order to ensure that the FLMAs are meeting their customers’ transportation needs and that they are fulfilling the requirements of MAP-21, the FLMAs seek to obtain OMB approval of a programmatic generic clearance that enables the joint collection of qualitative and quantitative feedback on transportation systems, facilities, and services at area, state, regional, landscape, or national levels. By qualitative feedback we mean information that provides useful insights on perceptions and opinions; quantitative feedback provides statistical results that can be generalized to the population of study.

In addition, the following laws, regulations, and statutes mandate or authorize the collection of information in support of the mission of the FLMAs:

* Forest Service Administration Organic Act of1897 [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
* Executive Order 13571 of April 27, 2011
* Executive Order 12996 of March 25, 1996
* National Park Services Organic Act of 1916
* National Wildlife Refuge System Administration Act
* National Wildlife Refuge System Centennial Act [P.L. 106-408]
* The Federal Land Policy and Management Act (FLPMA) of 1976
* General Survey Act of 1824
* National Environmental Policy Act of 1969
* Army Management Information Control System, AR 335-15 (1986)
* USACE supplement 1 to AR 335-15 (1990)

1. **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.**

Improving agency programs requires ongoing assessment of service delivery by systematically reviewing the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The scope of this programmatic generic clearance includes individual surveys, focus groups, or interviews of FLMA users, potential users, and residents of communities near FLMA sites. The FLMAs will collect, analyze, and interpret the resulting information to identify strengths and weaknesses of current recreation-related transportation systems (including rivers and trail systems), facilities, and services, and to make feedback-based improvements. The data collected will provide managers with reliable information to better inform: strategic planning; allocations of physical, fiscal, or human resources; modification or refinement of various program management goals and objectives or management plan revisions; and future planning efforts focused on developing more effective and efficient delivery of program services, whether on one or several unit(s) or at an interagency, cross-jurisdictional scope.

FLMAs may also get requests for this kind of information from the general public and/or a variety of organizations including Congressional staffs, newspapers, magazines, and transportation and/or recreational trade organizations.

The information collections will be designed and administered based upon standard statistical practices and sampling methodologies to ensure consistent, valid data that are representative of the target populations and account for non-response bias, according to the most recent OMB guidance on “Agency Survey and Statistical Information Collections (January 20, 2006).”

*Allowable Information Collection Methods*

The list below includes allowable collection methods under this programmatic clearance. Depending on the needs of each specific IC and the population(s) being surveyed, it may be necessary to combine one or more of the methods described below.

On-Site and In-person intercept surveys:

Survey instruments will be provided to respondents while on site to complete and return. This may include oral administration, paper forms, or the use of electronic technology and kiosks. The survey administrator will be prepared to answer any questions the respondent may have about how to fill out the instrument but not interfere or influence how the respondents answer the questions.

In some cases, this method may be combined with other methods. For example, respondents may be recruited in-person and asked to complete the survey at the end of their trip and either drop it off at one of multiple locations or return it via mail. Additionally, respondents may be intercepted on-site and then asked to complete a survey online, following their visit. If the in-person intercept and mailback (or online) approach is used, Dillman’s “Tailored Design Method” will be employed to develop a procedure for following up with respondents.

Web-based and social media based surveys:

The internet offers another means of surveying respondents, and is generally more convenient to the respondent, as he or she can complete the survey when they choose. Surveys may be posted on websites, including social media websites, or may be sent to respondents via email. If respondents’ emails are available, Dillman’s “Tailored Design Method” will be used to develop a procedure for following up with respondents.

Mail surveys

If customer address lists are available, a three contact-approach based on Dillman's “Tailored Design Method” will be employed. The first contact will be a cover letter explaining that a survey is coming to them and its importance. The second contact will be the survey instrument along with a postage-paid addressed envelope to return the survey. The third contact will be a reminder postcard sent 10 days after the survey was sent. Finally, the respondents will receive a letter thanking them for their willingness to participate in the survey and reminding them to return it if they have not already done so. At each juncture, the respondents will be given multiple ways to contact someone with questions regarding the survey (including phone, web, or email). If the survey has been lost, the respondent can request that another be sent to them. Electronic mail is sometimes used instead of postal mail to communicate with customers.

Telephone surveys:

If customer telephone numbers are available, telephone surveys may be used either alone, or in combination with some other method. In particular, this method is likely to be used if a national sample is required, or to reach respondents located in inaccessible or broadly dispersed locations. An approved number of attempts will be made to reach each respondent. Trained interviewers will be utilized to provide a brief explanation of the survey and its importance and use and collect the survey responses. The interviewer will then expeditiously move through the survey questions. If the interviewer fails to reach the respondent using the approved process, the interviewer will follow the approved process to reach the next contact. Given the increasing number of households in the United States that no longer have a landline phone in their home, we understand that a national survey conducted by phone will also need to utilize a cell phone sample to avoid coverage bias.[[1]](#footnote-1)

Focus groups:

Some data and information are best collected through more subjective, conversational means. Focus groups, which are small, informal group discussions designed to obtain in-depth qualitative information and are most useful in an exploratory stage or when the bureau/office wants to develop a deeper understanding of a program or service. Individuals will be specifically invited to participate in the discussion, whether in person or through technologically enhanced means (e.g., video conferencing, on-line sessions). A trained moderator whose role is to foster interaction will lead the conversation using a moderator’s guide, and will encourage participants to talk with each other about their experiences, preferences, needs, observations, or perceptions. The moderator will make sure that all participants are encouraged to contribute and that no individual dominates the conversation. Furthermore, the moderator will manage the discussion to make sure it does not stray too far from the topic of interest. The focus groups may be segmented, as necessary, according to a key variable of interest to the study (e.g., shuttle users, non-shuttle users), but within each segment the groups will be constructed to include a cross-section of users.

Comment Cards:

Comment cards offer an excellent means to give FLMA managers feedback. A comment card should have a limited number of questions and an opportunity to comment. These comment cards provide managers and service providers with direct and specific information from their customers that could not be obtained through any other means. The intent of comment cards is to provide anecdotal feedback. Although questions may include numeric scales, the data are not intended to be statistically significant.

*Allowable Information Collection Topics and Questions*

The information collection will target key topic areas such as:

* Respondent characteristics
	+ socioeconomic and demographic characteristics (e.g., home city and state, age group, gender, race, income)
	+ group characteristics (e.g., type of group, number of people/vehicles in party)
* Traveler information
	+ source(s) of information used to plan the trip/helpfulness of sources
	+ sources of information used during the trip
	+ preferences for traveler information
* Trip behaviors
	+ trip Planning (not including traveler information)
	+ trip motivation/purpose
	+ trip duration
	+ sites visited (e.g., trip origins and destinations, en-route stops)
	+ activities while at location(s) (e.g., walking, climbing, boating, camping, hunting, including subsistence activities)
	+ use of transportation modes/services
	+ transportation related conditions (e.g., parking traffic congestion)
	+ future visitation
* Assessment of visitor experience
	+ evaluations/opinions of transportation related services, facilities and conditions
	+ evaluations of shuttle service; future use; preferences for shuttle service
	+ opinions about system management and overall user preferences (e.g. improvements)
	+ evaluations of safety (as it relates to transportation planning, access, and use)
	+ evaluations of the environment (as it relates to transportation planning, access, and use), including perceptions related to resource protection and soundscape
* Economic impact and visitor spending/costs

A Compendium of Survey Questions related to these topics has been compiled for use by the FLMAs in designing their collaborative surveys. Agencies will identify which questions in their survey are taken from the Compendium. However, agencies will not be required to only use questions from the Compendium. If agencies choose to use questions that are not in the Compendium, the source for these questions must be clearly identified (e.g. are they new or are they taken from a previous survey that has been approved by OMB?), and these questions will need to be reviewed and approved by OMB.

Should any personally-identifiable information (PII) be collected,[[2]](#footnote-2) to ensure anonymity PII will not be stored with collected information at any time, and contact information will be purged from researcher files once data collections are complete.

The FLMAs will only submit a collection for approval under this programmatic clearance if it meets the following conditions:

* Information gathered will be used internally for general service improvement and program management and planning purposes and if released outside of the agency, procedures outlined in Question 16 will be followed;
* Information gathered will yield qualitative and/or quantitative information;
* The collections are voluntary;
* The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
* The collections are non-controversial and do not raise issues of concern to non-FLMA Federal agencies;
* Any collection is targeted to the solicitation of opinions and information from respondents who have experience with the program or may have experience with the program in the near future; and
* With the exception of information needed to provide remuneration for participants of focus groups, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the FLMAs will submit an information collection request to OMB for approval through the normal PRA process. To obtain approval for a collection that meets the conditions of this programmatic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the survey instrument or comment card).

The FLMAs each have established a manager/managing entity to serve for this programmatic clearance who will conduct an independent peer review of each information collection to ensure compliance with the terms of this clearance prior to sending the request to the Forest Service for submission to OMB.

1. **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.**

If appropriate, agencies will collect information electronically to reduce burden. For example, if FLMAs want to learn about visitors’ assessments following the completion of their entire trip, then it may be possible to collect the data via an online survey, completed when the respondent has returned home. However, there may be cases where FLMAs need to collect data during the visitors’ trip, and so it may not be feasible to conduct the survey online (unless tablet computers are available for use).

1. **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.**

There have been no previous multi-agency, coordinated studies of visitors’ perceptions, experiences, and expectations, with respect to transportation systems, conditions, and/or services, recreation opportunities, and visitor experience quality. Moreover, there have been no previous visitor survey research studies to jointly assess visitors’ opinions about potential changes in operations to improve transportation systems (including rivers and trails), services, and/or facilities at a multi-agency and area, state-wide, regional, or landscape scale.

While some of the FLMAs do conduct their own visitor feedback surveys (for example, the Forest Service administers surveys as part of its National Visitor User Monitoring Program, and the National Park Service has obtained a programmatic clearance for its Pool of Known Questions), these are agency-specific efforts. By contrast, this ICR is a multi-agency, collaborative effort, and it T is different from previous surveys in that it focuses on collecting data that will inform long range transportation planning. For this ICR, planning procedures have been developed to avoid the duplication of effort with agency-specific survey efforts. First, FLMAs collaborating on a survey must first insure that there are no current data that address their needs. If a survey has been recently conducted at the site (or in the region) and that survey includes transportation-related measures, the FLMA will use the existing data. Second, the collaborating FLMAs will select units (e.g., FS, FWS, BLM or NPS sites) that do not have current plans to administer an agency-specific visitor/user survey. Each partner participating in a collaborative survey effort will confirm with its agency that there are no plans to survey that unit during the current year or the next year. A Best Practices Guidance document that is being developed to assist users of this Generic Clearance will include these planning requirements in its survey planning chapter.

In addition, since the data from these collaborative survey efforts will be shared amongst agencies, the goal is to reduce duplication. If a collaborative visitor survey has been conducted in a particular region, then agencies will be able to use this data and will not have to conduct their own agency-specific surveys in the region; they can divert those resources to conducting surveys at other units/regions.

This programmatic generic clearance seeks to reduce duplication through increased collaboration and coordination among the FLMAs. It is not unusual for multiple FLMAs to exist within the same region, and rather than conducting separate surveys, the FLMAs can coordinate their needs into a single, joint data collection.

It is important to note that the information collected from FLMA customers and stakeholders, including approved survey instruments, final reports, and data will be archived in a shared database which can be accessed by all FLMAs. The purpose of the database is to keep the FLMAs informed about the survey efforts of their partner agencies so as reduce the duplication of efforts and public burden. The FLMAs may be able to use the results from other surveys to inform the development of their own survey projects. In addition the database encourages ongoing collaboration and communication among the FLMAs.

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

These information collections may impact small businesses or other small entities, as they may be included in the sampling frame (such as outfitters) for some survey efforts. However, the burden is the same for small entities as for all respondents. When designing the surveys, researchers will be very sensitive to respondent burden and will seek to collect the required information using the fewest possible questions. As appropriate, electronic collection methods will be utilized to reduce respondent burden.

1. **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.**

Intensive visitor use at many FLMA locations are threatening the resource and recreation management objectives for these areas, as specified in the respective FLMA resource management plans. The U.S. population continues to grow, as does the public’s use demands on its public lands.

Without these collaborative information collections, the public will be denied the opportunity for insightful and valuable input into management plans, as mandated by the open government Executive Order. Without these joint information collections, the FLMAs will continue to lack the information necessary to identify and implement feasible and publicly-accepted transportation and other facility and service improvements to help protect public land resources and enhance visitor experiences.

These joint information collections will become ever more important as FLMA budgets continue to shrink and demand for access to FLMA recreation sites continues to grow. These information collections will be a valuable input to long range planning and without these information collections, the FLMAs will struggle to meet their respective transportation, resource, and recreation management mandates.

1. **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 to participate, we may ask respondents to respond to the survey or comment card in fewer than 30 days after receipt. For example, respondents may be requested to complete a written response on-site at the time of the request, as this method tends to result in higher response rates. Respondents may also be asked to complete and return their survey via mail immediately following their visit. An immediate response will be encouraged to minimize any measurement error due to recall issues. Moreover, on these types of surveys, respondents normally will respond rather quickly if they intend to respond at all.

* **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 other special circumstances. Collections of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

1. **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.**

The Federal Register 60-day Notice was published on February 12, 2014, page 8429. The American Motorcyclist Association (AMA) and the Outdoor Alliance each submitted comments. A summary of their comments, and the response (delivered by email) are included below. In addition, Dr. Julia McQuillan, Chair and Professor of Sociology at the University of Nebraska-Lincoln, requested a copy of the Compendium of survey questions. She is currently planning a survey and was excited to learn about this survey effort.

Summary of Comments from Outdoor Alliance

The Outdoor Alliance, a coalition of five national, member based organizations provided a number of thoughtful comments on each of the four questions posed in the Federal Register Notice Request for Comments. On the question of whether this collection of information is necessary for the stated purposes and will have practical scientific utility, the Outdoor Alliance is supportive and indicated that this information collection “will have great practical value in improving the efficacy of planning efforts.” On the estimate of the burden of the collection, the Outdoor Alliance commented that neither the estimate nor the validity of the assumptions seemed unreasonable.

The Outdoor Alliance made several recommendations regarding the ways to enhance the quality, utility and clarity of the information to be collected. First, agencies should consider organizing surveys by topical area, rather than regionally, such that requests for information about recreation are separated from requests for other planning topics. Topic-specific outreach is likely to improve overall participation. Second, land management agencies must find ways to communicate the status of their plan revision process, including information collection efforts, to the public. One suggestion is that agencies should publish the information through their websites or through a comprehensive national tool (e.g., Forest Service’s SOPA site). Third, agencies should be sure to collect information from all stakeholders, including those who live far away as well as those who live nearby. Finally, the Outdoor Alliance commented that the NVUM undercounts many forms of active outdoor recreation use due to its site selection methodology. Data collection methodologies should incorporate more place-specific and condition information when selecting sites.

On ways to minimize the burden of the collection of information on respondents, the Outdoor Alliance recommended obtaining broad stakeholder input and incorporating existing sources of data into these data collection efforts. Examples of existing sources include the American Whitewater National River Database, the American Canoe Associations’ mapping of over 500 water trails, and the Mountain Project, among others.

Response to Outdoor Alliance’s Comments

“Dear Mr. Cramer,

I would like to thank the Outdoor Alliance for providing such detailed, thoughtful comments on the four questions posed in the Request for Comments regarding the “Interagency Generic Clearance for Federal Lands Management Agencies Collaborative Visitor Feedback Surveys on Recreation and Transportation-Related Programs and Systems” (Federal Register Document Number 2014-02980). Below I have responded to each comment separately.

1. On the question of the utility of the information collection, I am pleased that the Outdoor Alliance supports this information collection and feels that it will have practical utility.
2. On the question of the burden estimate, I would like to thank the Outdoor Alliance for your review, and your positive feedback that both the estimate and the underlying assumptions are reasonable.
3. We appreciate the Outdoor Alliance’s recommendations on how to enhance the quality, utility and clarity of the information to be collected.
	1. In its first recommendation, the Outdoor Alliance suggested organizing the information collection efforts by topic area, rather than regionally. In order to improve participation rates, the Outdoor Alliance proposed that recreation users should be targeted for information requests involving recreation; they may be less likely to participate if the request is related to other planning topics (e.g., timber, grazing), due to a lack of time or knowledge. The focus of this information collection is obtaining user feedback on transportation-related services and facilities on Federal Lands, so that FLMAs can use this visitor data to inform their transportation planning (in addition to using other sources of data for this purpose). As a result, users of Federal Lands will be the target population, and we will ask them about their transportation-related experiences. To understand users’ assessments regarding their transportation experiences and to help identify users’ transportation needs, this information collection will also collect data on the reasons why users access Federal Lands and the activities they engage in on Federal Lands. In order to reduce respondent burden, we will use screening questions to screen out respondents who may not have experience or knowledge on a specific topic.
	2. In its second recommendation, the Outdoor Alliance indicated that agencies should improve their communication about both their data collection efforts, as well as their planning process. Regarding communication about data collection efforts, the FLMAs plan to archive the approved survey instruments, final reports and data they collect on a shared platform that can be accessed by all FLMAs, and reports of the results will be shared with the public on websites. Regarding agencies’ communications about the planning process, we cannot respond to Outdoor Alliance’s comment that the planning process should be made more public. This information collection request only pertains to the collection of visitor/user data and does not address the planning process itself.
	3. In its third recommendation, the Outdoor Alliance stated that information should be collected from stakeholders who are both proximate and distant. We agree that it is important to obtain feedback from both local users as well as those who have traveled longer distances to visit a site or area. When conducting surveys as part of this information collection, sampling procedures will be designed to insure that a representative sample of users is obtained. In this way, the proportion of users in our sample who live nearby and the proportion who live farther away (for example, out-of state) will reflect the proportion of each of these groups in the population as a whole (that is, the population of all site users). When using qualitative methods, such as interviews or focus groups, we will recruit respondents who vary by gender, age, residence, and other relevant characteristics (this will vary, depending on the purpose of the study).
	4. In its fourth recommendation, the Outdoor Alliance suggested incorporating more place specific and activity specific information into data collection methodologies. In selecting sites for administering surveys, we will select a variety of sites in order to capture the full range of activities that are engaged in on Federal Lands. Certainly, there is seasonal variation in recreation, and if a survey cannot be conducted at different times of the year to capture this variation, then it may be necessary to ask respondents about both their current activities (e.g., on this trip), as well as activities they have ever engaged in (e.g., during other seasons) to avoid undercounting activities. While we will try to be more granular in measuring outdoor recreation activities, we are also sensitive to respondent burden. Moreover, the primary focus of this information collection is on measuring users’ transportation- related experiences.
4. With respect to minimizing burden, the Outdoor Alliance recommended incorporating the use of existing data into information collections. We fully support this idea, and where possible, we will utilize existing datasets. The datasets and databases cited in the comments provide valuable information that can be used to select sites for intercepting or interviewing users. In some instances, the databases also contain users’ comments or feedback on the facilities (e.g. trails). However, this data is qualitative, and was not gathered using systematic survey research methods.”

Summary of Comments from the American Motorcyclist Association

The American Motorcyclist Association (AMA), which represents the interests of American on-and off-highway motorcyclists and all-terrain vehicle riders, requests that off-highway vehicle (OHV) recreation use be adequately represented in this information collection, so that an accurate level of economic benefit can be attributed to motorized recreation. In particular, since OHV recreation often occurs some distance from developed facilities, the AMA feels that this activity tends to be undercounted. As a result, “the AMA believes this unfairly minimizes motorized recreation’s positive impact on local economies and attendance.”

Response to AMA’s Comments

“Dear Mr. Allard,

I am writing to you in response to American Motorcyclist Association’s (AMA) comments on the information collection proposed in Federal Register Document Number 2014-02980. We appreciate the AMA’s interest in this information collection, and you raise an important point in your comments. In sampling users of Federal Lands, we will make every effort to select sites that will yield a representative sample of the population of users. In addition to sampling sites that are near developed facilities, we will also sample sites that are in less developed areas. Ultimately, our goal is to obtain a representative sample of users and to understand the range of transportation-related experiences and needs on Federal Lands.”

**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.**

Since approximately January 2012, the “Collaborative Visitor Transportation Survey” (CVTS) team has been meeting monthly to review ongoing progress related to this collaborative survey effort. The team includes multiple representatives from each of the FLMAs, as noted below.

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| --- | --- |
| **Agency** | **CVTS Representative(s)** |
| Army Corps of Engineers | Kathy Perales, Meredith Bridgers |
| Bureau of Land Management | Rob Perrin, Randy Goodwin |
| Fish and Wildlife Service | Kevin Kilcullen |
| Forest Service  | Wolf Cota, Marie Messing |
| National Park Service  | Bryce Lloyd, Jennifer Kovarik, Paul Schrooten, Kerri Cahill |

In addition, representatives from the following outside agencies have participated as core members of the CVTS team:

* Volpe National Transportation Systems Center (U.S. Department of Transportation)
* Bureau of Transportation Statistics (U.S. Department of Transportation)
* Federal Highway Administration (U.S. Department of Transportation)
* Paul S. Sarbanes Transit in Parks Technical Assistance Center
* US Geological Survey

In May 2013, a two day workshop was convened to discuss all aspects of the survey effort, including survey questions, methodologies, and data management. In compiling the full set of transportation related questions to be included in this programmatic clearance, the CVTS team helped identify relevant transportation surveys. Researchers involved in transportation-related survey efforts on Federal lands were also contacted for their insights (including Dr. Lena Le, Parks Studies Unit, University of Idaho; Dr. Robert Manning, Director, Park Studies Laboratory, University of Vermont). In addition, the members of the CVTS team have reviewed and commented on the survey questions and methodologies included in this programmatic clearance.

Prior to the submission of individual information collections, University faculty and scientists in the field and other knowledgeable persons with an interest in public lands management, as well as user group associations may receive draft copies of information collection instruments and methods and be asked to review and comment on all aspects of data collection, including complexity of questions and the value of each question proposed.

Additionally, similar consultation may be conducted with Federal managers at other FLMAs not sponsoring that particular data collection.

**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.**

This is a new Information Collection and therefore there are no respondents with whom to consult.

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

Incentives, remuneration, and gifts are generally deemed inappropriate as part of plans for information collections conducted within the scope of this programmatic clearance.

Generally, the FLMAs will not provide payment or other forms of remuneration to respondents of surveys, questionnaires, and/or comment cards.

There may be extraordinary circumstances however, under which remuneration may be appropriate within the scope of this program. In the case of in-person focus groups, for example, the FLMAs may seek approval to provide stipends. In the cases of information collections that seek to use incentives, program managers must describe the proposed incentive, how it will be offered to respondents, and provide a justification of its use within the supporting statement, which is required as part of each information collection request under this package.

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

In general, no assurance of confidentiality will be provided to respondents to the surveys conducted under this program. Those who inquire about this issue will be told that their answers will be used only for statistical purposes. They will also be told that reports prepared from this study will summarize findings across individual samples so that responses will not be associated with any specific individuals. Respondents will be informed further that the Agency and its research partners will not provide information that identifies respondents, except as required by law.

Personally identifying information (telephone numbers, e-mail addresses, and postal addresses) is typically not collected, but it may be necessary to collect this information if the survey is being administered post-trip (e.g., via an online survey). Under such circumstances, personally identifying information will be kept separate from data files and not associated with any particular response; moreover, it will be destroyed as soon as the receipt of a response has been recorded. Therefore, the administration of surveys conducted under this program is essentially anonymous.

However, if a confidentiality pledge is deemed useful and feasible, the Agency will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

1. **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.**

The survey questions included in this programmatic clearance are not considered sensitive and are related only to visits to the study areas. However, respondents may be asked to indicate their gender, level of formal education, race, ethnicity, and a range for their annual household income. 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.

Information collection staff will be instructed to tell respondents they may decline to answer any questions.

1. **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.**

A variety of instruments and platforms will be used to collect information from respondents. We anticipate that over a three year period, there will be no more than 337,800 respondents. Given these estimates, the total burden hours over the three year will not exceed 97,470 burden hours (see table 1 below).

For the purposes of estimating and budgeting for the overall 3 year burden for this Generic Clearance, we have made the basic assumptions outlined in table 1 below. Each information collection request submitted under this Generic Clearance will provide the specific estimates of burden related to that particular information Collection request, along with an explanation of how those estimates were determined.

We estimate the total dollar value of the burden hours for this collection (over a three year period) to be $3,037,165. We arrived at this figure by multiplying the estimated burden hours over a three year period by $31.16, the wage rate (including benefits) based on the National Compensation Survey, and published by the U.S. Department of Labor, Bureau of Labor Statistics (see December 11, 2013 news release presenting data for September 2013: <http://www.bls.gov/news.release/pdf/ecec.pdf>).

**Table 1**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of Collection** | **Annual No. of Respondents** | **3 Yr. Total****No. of Respondents** | **Completion****Time** | **Annual****Burden Hours** | **3 Yr. Total Burden Hours** |
| **Surveys** Assume 40 surveys/year across the agencies X 3 years = 120 surveys totalAssume 1,800 responses for each survey effortAssume 500 non-respondents per survey effort | 72,000respondents20,000 non-respondents | 216,000 total respondents(120 X 1,800)60,000 totalnon-respondents(120 X 500) | 25 minutes(.42 hours)2 minutes(.03 hours) | 30,240 for respondents600 for non-respondents | 90,720 for respondents1,800 for non-respondents |
| **Focus groups**Assume 10 groups/yearX 3 years= 30 groups total (Assume 10 respondents per group) | 100 | 300(30 X 10) | 90 minutes(1.5 hours) | 150 | 450 |
| **Structured Interviews**Assume 10 interview projects/year x 3 years= 30 interview projects total(assume 50 respondents per interview effort) | 500 | 1,500(30 x 50) | 60 minutes(1 hour) | 500 | 1,500 |
| **Comment card (cc)**Assume 40 cc/year X 3 = 120 cc total (3 years)(Assume 500 respondents per cc) | 20,000 | 60,000(120 X 500) | 3 minutes(.05 hours) | 1,000 | 3,000 |
| **Total** | **112,600** | **337,800** | - | **32,490** | **97,470** |

1. **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.**

No capital and maintenance costs to the respondents are anticipated.

1. **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 annualized cost to the government is unknown. Each subsequent survey or collection will be developed and designed on a case-by-case basis and will provide an estimate of the cost to the Federal government. The program staff will determine if it is more efficient and cost effective to develop, distribute, collect, and analyze these surveys in-house or to turn to private or other non-government entities to provide that service.

Using the NPS Programmatic Clearance as a model (OMB Control Number 1024-0224), we provide a reasoned estimate, assuming a ratio of three hours of Federal work for each hour of survey time, with the Federal work at an average pay level of GS-12 step 5, which is $37.73 per hour OPM Salary Table 2013-GS. Using a multiplier of 1.5 [as implied by the previously referenced BLS news release] to add benefits, the full compensation cost would be $56.59 per hour.

The estimated annual cost to the Federal government is calculated by multiplying the 32,490 annual burden hours multiplied by 3 (to account for Federal time), multiplied by $56.59 per hour, which equals $5,515,827. This equates to a cost to government over the 3 year period of $16,547,482.

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

This is a new Information Collection request.

1. **For collections of information whose results will be published, outline plans for tabulation and publication.**

Each information collection considered under this Programmatic Clearance will describe how the data will be used. Each information collection will provide to OMB the specific tabulation methods used to synthesize, analyze and aggregate data collected.

Most analyses of surveys conducted under this program will involve simple tabulations to address concrete management and planning issues. These include response frequencies, means, standard deviations, confidence intervals, and breakdowns of these by important sub-groups of respondents. Depending on the purpose of the data collection, more complex multivariate statistical analyses may be performed. Data from qualitative studies may involve transcriptions of interviews or focus group discussions, followed by content analyses identifying general themes.

Findings will be used for programmatic service/facility improvements and for transportation planning purposes.

The FLMAs will disseminate the findings when appropriate, strictly following their respective "Guidelines for Ensuring the Quality of Information Disseminated to the Public." They will also include specific discussion of the limitation of the results discussed above.

1. **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.

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

These activities will comply with the requirements in 5 CFR 1320.9.

1. According to the Center for Disease Control’s National Center for Health Statistics (January – June 2013), 39.4 % of American homes have only wireless telephones. Hispanics, younger adults and the poor are more likely to use only a cell-phone. See: <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201312.pdf> [↑](#footnote-ref-1)
2. For example, if conducting a mailback survey, we may want to collect respondents’ home address so we can mail them a reminder postcard to complete the survey. If conducting an online survey, we will need to collect respondents’ email address, so we can send them the link to the online survey. [↑](#footnote-ref-2)