

# **Supporting Statement A**

## **RECREATION USE DATA REPORTS**

**OMB Control Number 1006-0002**

**Terms of Clearance: None**

### **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 Bureau of Reclamation (Reclamation) is responsible for recreation development at its reservoirs when such development is determined to be feasible. There are 289 designated recreation areas as a result of Reclamation's water related project developments within the 17 Western States. Recreation on Reclamation lands is primarily governed by the following legislation: The Reclamation Recreation Act of 1992 (Public Law 102-575), which amended the Federal Water Projects Recreation Act of 1965 (Public Law 89-72).

Public Law 102-575 recognizes the responsibility of the Federal government to provide opportunities for public recreation at Federal water projects. Further, section 2802(2) of the same Act acknowledges the public demand for outdoor recreation and the impact on changes in the economic climate for recreation managing entities. Section 2802(5) states that there should be Federal authority to expand existing recreation facilities to meet public demand. Pursuant to the applicable sections of this legislation, Reclamation must be able to respond to emerging modern trends and demands from the public. Consequently, statistically valid and up-to-date data derived from the user constituencies is necessary in order to provide recreation programs beneficial to the public.

Public Law 102-575, section 2805(c)(1)(A) authorizes the Secretary of the Interior (Secretary), acting through the Commissioner of Reclamation, to develop, maintain, and revise resource management plans to provide for the development, use, conservation, protection, enhancement, and management of resources on Reclamation lands. Data gathered, through use of the requested information collections, aids Reclamation recreation planners, economists, environmentalists, and social analysts with feasibility determinations for the development or modification of recreation areas.

- 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.**

Data obtained from the Recreation Use Data Report is used by Reclamation to account for visitation, facilities, revenue, concessions operations, and use by the recreating public. Managing partners will continue to be responsible for completing the forms and submitting them to Reclamation on an annual basis.

Data provided in the previous years established a record of recreation development at multi-use projects and assisted management with compliance with Federal laws, codes, and regulations. In addition, Reclamation can continue to respond to recreation-related information requests from the Department of the Interior, Congress, and other Federal, state, and local agencies.

Please see the attached Questions Justifications sheet for the justification of each question contained on the forms.

- 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.**

Reclamation has determined that this information collection is not a practicable application for electronic collection. Due to decentralized operation in Reclamation, this information is collected by approximately 30 separate field office locations. When Reclamation mails the questionnaire to the specific managing partner or concessionaire, a cover letter indicates the Reclamation office address to which the completed forms are to be returned. However, an option to complete a “fillable” form is available to ease the reporting burden of those managing entities with electronic capability.

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.**

No other agency collects Reclamation-wide recreation-related information.

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

The collection of information will not impact 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 information is not conducted or were to be administered less often, it would be difficult to ensure the public's interests are being met. Reclamation provides recreational activities on Reclamation lands and waterbodies, and the information collected also assists in identifying and preventing unauthorized activities at those recreational sites. In addition, Reclamation will not be able to effectively respond to inquiries from Congress or the public if the information is gathered less frequently.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- a. **requiring respondents to report information to the agency more often than quarterly;**

N/A.

- b. **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Respondents will not be required to report information in fewer than 30 days.

- c. **requiring respondents to submit more than an original and two copies of any document;**

Each respondent will not be required to submit more than one copy of the form.

- d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

Nothing in these forms requires the retention of records for more than 3 years.

- e. **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;**

N/A.

- f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Statistical data classification will not be used.

- g. **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;**

A pledge of confidentiality is not used. No special circumstances impede the sharing of this information with others. All Reclamation data security policies will be enforced.

- h. **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.**

Respondents are not required to submit trade secrets or other confidential information.

- 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.**

Notice was given in the Federal Register on September 3, 2015 (80 FR 53326). No comments were received on this information collection.

- a. **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.**

Reclamation has consulted with members of the public regarding the clarity of the instructions, the frequency of the collection, and how easily the data is to retrieve for each form, and in all cases there were no recommended changes to the forms or their instructions.

- b. 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.**

Reclamation personnel who have responsibility for collecting information from their managing partners have reviewed and provided input on the information collection. In addition, Reclamation reached out to the following individuals from the public in an effort to see if any adjustments to the forms are needed:

	<b>Title</b>	<b>Address</b>	<b>Phone</b>	<b>Time to Complete Forms 7-2534 and 7-2535</b>
Dan Rieves, Larimer County Department of Natural Resources	Carter Lake District Manager	1800 South County Rd 31 Loveland, CO 80537	970-619- 4456	30 minutes
Mary Davis, Estes Valley Recreation and Park District	Director	690 Big Thompson Ave Estes Park, CO 80517	970-586- 8191 ex 4	30 minutes
Monique Mullis, Colorado Parks and Wildlife	State Park Manager	600 Reservoir Road Pueblo, CO 81005	719-561- 9320 ext. 10#	30 minutes

The three individuals contacted above, and Reclamation personnel working with managing partners, report that the information collection is clear to the public, and that on average, 30 minutes is an accurate estimate in completing each form.

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

No payments or gifts will be provided to respondents.

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

No proprietary financial data will be made public. The form cover letter will state that financial data involving public funds will be available to the public upon request. The description of the activities available at the site are evident and will only be used to encourage visitation and assist in the planning for facility or service changes at specific sites.

**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.**

No questions of a private or sensitive nature will be asked.

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

- a. 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.**

See response to item 12(b) [next paragraph].

- b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

Based on current numbers, the estimated number of respondents remains at 155 managing partners (Form 7-2534, Part I) and 115 concessionaires (Form 7-2535, Part II), resulting in 270 total respondents. [Note: Although Reclamation only has 63 individual non-Federal managing partners, those partners manage multiple areas. Therefore, there are 155 individual areas where forms have to be completed for Part I, Managing Partners and Direct Managed Recreation Areas. In this instance 155 managing partners means the same as 155 respondents.] The number of respondents for Part II, Concessionaires, remains at 115.

<b>Form Number/Title</b>	<b>Burden estimate per form (mins)</b>	<b>Annual number of respondents</b>	<b>Annual burden on respondents (in hours)</b>
7-2534 (Part I, Managing Partners and Direct Managed Recreation Areas)	30	155	78
7-2535 (Part II, Concessionaires)	30	115	58
<b>TOTAL BURDEN HOURS:</b>			136

- c. 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.”**

The 2014 Department of Labor (Bureau of Labor Statistics) reports a mean hourly wage of \$22.71 for all workers in the United States regardless of occupation or geographic location (Note: 2014 data is the most current available). The mean hourly wage of \$31.79 includes the hourly wage of \$22.71 plus \$9.08 for benefits using a factor of 1.4 (source for hourly wage is [http://www.bls.gov/oes/current/oes\\_nat.htm#b00-0000](http://www.bls.gov/oes/current/oes_nat.htm#b00-0000)). The total annualized cost to respondents is \$4,323.44 rounded (136 hours × \$31.79). The annual cost per response is \$15.90 (\$31.79 divided by 2).

- 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.)**

- a. The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

The estimated total capital and start-up cost is \$0.00. It is not expected there will be any additional cost to the respondents for completing this report. The data being requested concern activities managed by the entity and the assurance of agreement/contract compliance.

- b. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

The estimated total operation and maintenance (O&M) and purchase of services component O&M cost is \$0.00. The data being requested concerns activities managed by the entity and the assurance of agreement/contract compliance.

- c. Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Cost estimates do not include these purchases.

- 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.**

Reclamation estimates the total annual cost to the Federal Government to be \$11,283 for experienced Reclamation staff to collect, analyze, and process the estimated 270 annual responses associated with this information collection (Form 7-2534 and 7-2535). No additional equipment will be required. The annual cost to the Federal Government is estimated as follows:



Cost Activity	Costs
<p>Staff costs to collect, analyze, and process data collected by the forms in this information collection. Data collection and analysis includes costs to send out material, follow up, read, and analyze data.</p> <p>It is estimated that a Reclamation employee will spend approximately 1 hour per response to complete the tasks listed above. The average grade of the employee is estimated to be a GS-11, step 5 with an hourly wage of \$41.79 (\$27.86 x *1.5 benefits multiplier). These figures were taken from the 2015 OPM Salary Schedule.</p> <p>Since the number of responses is 270, the annual estimated cost to the Federal Government is \$11,283 (\$41.79 x 270).</p>	\$11,283
Miscellaneous administrative costs for equipment and support staff.	-0-
<b>TOTAL Federal Government Costs</b>	<b>\$11,283</b>

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

No adjustments are being made to the hour or cost burden to the public.

**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.**

The data being reported will not be published, but used to verify conditions of contractual and management agreements. Data collection will begin within 30 days after the end of the first 12-month period being reported.

**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 expiration date for OMB approval will be displayed on the forms in this information collection (Form 7-2534 and Form 7-2535).

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

No exceptions to the certification statement are being requested.