

SUPPORTING STATEMENT FOR REQUESTS FOR APPROVAL UNDER
THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
TVA Recreation User Survey
OMB Approval # 3316-NEW

Summary:

- This is a regular request.
- The information collection is planned to be conducted in Spring 2016.
- The information collection is a new request
- This information collection does not employ statistical methods.

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

In 2011 the TVA Board of Directors approved the twenty-year Natural Resource Plan (NRP). Since FY 2014 Board has provided “enhanced stewardship funding” to support implementation of the NRP. Survey is designed to guide TVA’s project funding decisions as we build more infrastructure and strive to provide increased recreational opportunities for the public. There is no administrative requirement, statute or regulation mandating or authorizing this collection of information. NRP Recreation Goal: “TVA will protect and conserve while providing recreational opportunities across the region. TVA is committed to maintaining, enhancing and increasing recreation opportunities and addressing unmet needs through comprehensive recreation programs and strategic partnerships.” NRP page 114. Survey results will provide guidance for new facility development and refinements to management methods for recreation areas 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.

Survey results are designed to guide TVA’s Senior Management in funding decisions for competing stewardship projects and for recreation resource (land, staff time and funding) allocation decisions. Of two separate surveys being proposed, one survey will be for general recreation users; while the other will be for shoreline property owners who access water areas directly from their private lands along the shore. The first survey (of general recreation users) will be administered on-site at the public access points such as boat ramps, marinas, fishing piers of select reservoirs. The second survey (of property owners) will be conducted by mail as they are less likely to be intercepted at the public areas and more likely directly access the water area from their shoreline property. Both surveys are designed to understand their recreational use of reservoirs, and their expenditure in the area for recreation-related activities. . There is no information from a “current” collection.

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.

TVA considered a variety of survey techniques; however, the TVA Shoreline Property Owner Survey is designed as return mail survey and the TVA Recreation Use Survey will be an onsite survey to ensure data collection and data integrity. A convenient, self-addressed and pre-paid envelope will be provided to help respondents with easily mail back. TVA will mail a reminder to the selected respondents for the TVA Shoreline Property Owner Survey to encourage survey completion and return.

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.

Survey data specific to recreation demand, user participation rates and associated economic impacts for the Tennessee Valley Reservoir and shoreline system is not currently available from other sources.

5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Client based mail-in forms. Small businesses (commercial marinas, outfitters and campgrounds) will be asked to provide survey forms to clients, which would be completed by clients and returned by mail.

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.

TVA's Senior Management would have less background for decision making (to validate) decisions regarding competing stewardship projects and for resources (land, staff time and funding) allocation decisions. Technical obstacles include lack of technology in remote areas that would result in poor levels of input from certain segments of the population desiring recreation services/opportunities. Legal obstacles are not apparent for this effort.

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 statistical data classification that has not been reviewed and approved by OMB;

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require the collection of information to be conducted in a manner inconsistent with the guidelines of 5 CFR 1320.6.

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

A copy of the Federal Register Notices are attached. There were no public comments received by TVA.

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.

The University of Tennessee and other Tennessee Valley Land Grant Universities were consulted prior to contract negotiations for this survey project.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years—even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Survey is designed to be voluntary, anonymous and completed by around 3,500 respondents, so circumstances preclude consultation with specific representatives.

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

None.

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

Survey is designed to be anonymous with regards information collected. The results of the survey will only be presented in the aggregate to prevent any individual responses from being identified.

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.

Not applicable.

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.

TVA plans to survey up to 3,529 total individuals between the two distinct populations being surveyed. One is the "TVA Shoreline Property Owner Survey", TVA plans to survey between five-hundred to one-thousand specific shoreline property owners. The other survey will be the "TVA Recreation Use Survey" for up to four Reservoirs," TVA plans to survey between two thousand to twenty-five hundred members of the general public recreating on TVA reservoirs and shoreline (not the property owners). Estimated time will be around .33 for the "Recreation User Survey" to .50 hours for the "Shoreline Property Owners"; burden was estimated from previous similar study by TVA conducted in 2008 & 2009.

**For 2,500 Recreation User Survey @ 0.33 hours for a total of 825 hours
For 1,029 TVA Shoreline Property Owners @ 0.50 hours for a total of 515 hours
Total Time Burden of 1,340 hours.**

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

- 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 in Item 14.

The median household income for Tennessee in 2014 was \$44,361; therefore at \$21.33 per hour respondent's time/cost is one-time and voluntary estimated at 0.33 to .5 hours or about twenty to thirty minutes cost in time of \$7.11-\$10.67 each..

**For 2,500 Recreation User Survey @ \$7.11 for \$17,775
For 1,029 TVA Shoreline Property Owners @ \$10.67 for \$10,979
Total Burden of \$28,754.**

13. Provide an estimate 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 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. 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 contract is for \$181,000 and TVA staff time is estimated at \$15,000 for a total cost to the Federal government of \$196,000.

- If cost estimates are expected to vary widely, agencies should present rates 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. **Not Applicable**

- 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. **None**

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The contract is for \$181,000 with TVA staff time estimated at \$15,000 for cost to Federal government of \$196,000.

a) Number of respondents	3,529
b) Frequency of response	once
c) Number of responses	3,529
d) Hours per response	.33-.5
e) Annual burden	1340 hours (one year only)

It should be noted that the total burden estimated above is the maximum possible burden on respondents with estimated response rate of 50-60%. However, the actual total burden might be less than this, depending on what proportion of contacts decide to take the time to complete the survey.

15. Explain the reasons for any program changes or adjustment reported in Items 13 or 14 of the OMB Form 83-I. **Not Applicable**

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 collection is expected to start during Spring and Summer of 2016 with data review, analysis and impact estimates during Fall of 2016 with final report December 2016. Media release on findings and publication in technical journals by professors will follow in 2017. TVA will use information for briefings to it's Board and Senior Management and to prioritize recreation projects. Sample averages will be used to project estimates of economic impacts across the reservoir system.

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable.

B. Collections of Information Employing Statistical Methods

Standard statistical methods of sample selection and aggregation will be followed to gather data, estimate sample mean, and extrapolate that to the population. Supporting statement B describes in more detail the sampling and analysis procedure.