SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Glacier Bay National Park and Preserve Bear Sighting and Encounter Reports OMB Control Number 1024-New

Terms of Clearance. None.

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

The National Park Service (NPS) Organic Act of 1916, 54 U.S.C. §100101, et seq., requires that the NPS preserve national parks for the enjoyment, education, and inspiration of this and future generations. Permit requirements and restrictions for recreational activities in the backcountry are governed in accordance with the regulations found at Title 36, Code of Federal Regulations, Sections 1.5, 1.6, 2.10 and 13.116.

In order to monitor resources and wildlife in the Glacier Bay National Park and Preserve (GLBA) and to enhance the safety of future visitors and wildlife, the park monitors sightings and interactions by visitors with bears and captures the data using two forms specific to GLBA:

NPS Form 10-405, "Tatshenshini – Alsek River Bear Report Form 1", and NPS Form 10-406, "Glacier Bay Bear Information Management (BIM) Report Form 2."

The bear sighting and encounter reporting forms are an extension of our statutory authority and responsibility to protect the park areas we administer and to manage the public use thereof. NPS regulations codified in 36 CFR 1-7, 12 and 13, are designated to implement statutory mandates that provide for resource protection and public enjoyment.

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.

Bear sighting data provides the park with important data used to determine bear movements, habitat use, and species distribution. This information can be used in backcountry management and planning, field research planning, and educational outreach for visitors. Bear-human interaction data is vital to understand how bears respond to people, detecting changes in bear behavior, and identifying potential areas of high bearhuman conflict. Obtaining immediate information on bear-human conflicts allows managers to respond promptly to mitigate further conflicts. Proactive mitigation includes notifying other backcountry users, issuing advisories or recommendations, or issuing closures to prevent further conflicts and maintain public safety. Additionally, managers may respond to reports of bear-human conflict with bear management techniques such as hazing or aversive conditioning. Obtaining current accurate information on bear sightings and interactions is essential for public safety and to effectively manage bears and people to minimize conflicts. Summary statistics (without personal information) may be generated to examine long-term trends in types and locations of bear-human interactions. Observations and interactions by visitors are recorded via the two forms: NPS Form 10-405 and NPS Form 10-406.

NPS Form 10-405, "Tatshenshini – Alsek River Bear Report"

The NPS requires the submission of NPS Form 10-405 upon exiting the park backcountry in order to collect information regarding bear sightings within GLBA. The collection and timeliness of the data collection is critical for the NPS' ability to enhance the safety of future visitors and to protect the bear population at the park. Information collected via NPS Form 10-405 includes:

- Group name;
- Take-out date;
- Whether visitor encountered dirty campsites left by previous users or observe unsafe or inappropriate behavior by other groups; and
- Detailed information for each sighting documented on the form, to include:
 - Date/time,
 - Species type,
 - Total number of bears seen together (for each sighting),
 - Bear unit type,
 - Estimation of distance between visitor and bear(s),
 - Whether the bear was aware of the group,
 - Bear reaction to group,
 - Activity of group,
 - Number of observers,
 - Location description/campsite name/GPS position/other comments; and

NPS Form 10-406, "Bear Information Management Report"

Submission of a completed NPS Form 10-406 is required when a bear enters camp, approaches the group, damages gear, obtains food, and/or acts in an aggressive or threatening manner towards the group. The collection and timeliness of data concerning bear-human contact is critical for the NPS' ability to enhance the safety of future visitors and to protect the bear population at the park. Information collected via NPS Form 10-406 includes:

- Name and phone number of the primary person involved in the interaction;
- Group type: park visitor, concession employee, contractor, researcher, NPS employee, or other;
- Number of people who encountered the bear;
- Corresponding sighting number on NPS Form 10-405; Location 1-28 (Backcountry vs Developed Area A and B);
- Types of vegetation in area of encounter;
- The bear's activity when it was first observed;
- The group's activity prior to seeing the bear;
- The bear's initial and subsequent reaction to the group;
- Group's response to bear's reaction;
- Group's distance to the bear;
- Whether food was present, and if so, if it was eaten by the bear;
- Whether property was damaged;
- Detailed description of the interaction;
- Detailed description of the bear, to include color, markings, scars, tags, etc.;
- Date, time, and duration of encounter;
- Exact location of encounter documented on map provided by GLBA, to include

the latitude/longitude; and,

- Where did the individual learn about how to behave while in bear country?
- Whether visitor encountered dirty campsites left by previous users or observe unsafe or inappropriate behavior by other groups.

The information gathered via NPS Form 10-405 and NPS Form 10-406 is vital to the safety of future visitors and bears within Glacier Bay National Park and Preserve including the Tatshenshini Alsek River corridor. The information is used by GLBA to determine:

- bear movements, habitat use, and species distribution;
- backcountry management and planning, field research planning, and educational outreach for visitors;
- how bears respond to people, detecting changes in bear behavior, and identifying potential areas of high bear-human conflict;
- how to respond to mitigate further conflicts including notifying other backcountry users, issuing advisories or recommendations, or issuing closures to prevent further conflicts and maintain public safety;
- if bear management responses such as hazing or aversive conditioning are needed;
- how to enhance public safety and to effectively manage bears and people to minimize conflicts; and,
- summary statistics (without personal information) examining long-term trends in types and locations of bear-human interactions.
- 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 requested information is unique to each applicant, and no other source is available. The information is collected in the backcountry with no Internet access, so it is not possible to collect the information electronically. There is no other opportunity to collect this information.

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.

We do not collect similar information pertaining to bear sightings and/or encounters with bears in the backcountry.

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

This collection has no impact on small business 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.

Backcountry users do not present themselves as identifiable park users through any other statistical or visitor contact method. This information is critical to GLBA's efforts to ensure advisories, warnings, and educational materials are as up-to-date as possible.

- 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 special circumstances that would cause us to collect the information in a manner inconsistent with OMB guidelines.

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.

On June 26, 2015, we published in the Federal Register (80 FR 36844) a Notice of our intent to request that OMB renew this information collection. In that Notice, we solicited comments for 60 days, ending on August 25, 2015. No public comments were received in

response to this Notice.

In addition to the Federal Register notice, we contacted the nine (9) individuals familiar with this collection and asked the following questions regarding NPS Forms 10-405 and 10-406:

"Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary"

<u>*Comments:*</u> The comments received all indicated that the information collected was necessary and important, it has practical use and no questions were unnecessary.

<u>NPS Response/Action Taken</u>: No responses required.

"The accuracy of our estimate of the burden for this collection of information"

<u>*Comments:*</u> One respondent replied 15 minutes another 8 minutes with the remaining providing an estimate of 5 minutes

<u>NPS Response/Action Taken</u>: No action required; the estimates were within the NPS burden estimate of 5 minutes for completion of each form.

"Ways to enhance the quality, utility, and clarity of the information to be collected"

<u>Comments</u>: All comments thought the information we collect was clear and concise. One commenter asked for a less intimidating bear on the front and another asked us to collect more information and have the person filling out the form give longer narrative.

<u>NPS Response/Action Taken</u>: No changes were made based on this feedback. The NPS replied to explain that we are trying to lessen the burden of our park users and collecting more information was not necessary at this time and would defeat that purpose of the collection. The graphic of the bear is a depiction of the most commonly encountered bear in the park.

"Ways to minimize the burden of the collection of information on respondents"

<u>*Comments:*</u> All respondents felt the burden placed on them was appropriate. One respondent requested the form allow for multiple report in the event they have more than one encounter in the backcountry.

<u>NPS Response/Action Taken</u>: The form was developed to document a single encounter. If a visitor experienced more than one encounter, they would need to fill out a second form. It is very rare to have more than one encounter.

Additional comments received during the outreach:

<u>Comments</u>: One respondent indicated the map is helpful but requested it be reduced without compromise of information. They also asked the NPS to go back to using ammo can to submit reports and asked for the ability to complete the forms after leaving Dry Bay.

<u>NPS Response/Action Taken</u>: The NPS will consult with the park facilities personnel on the issue of returning the ammo cans. The NPS does not agree with the submission of forms after departure from the parks. We rely on the timeliness of the submissions in order to quickly raise awareness of the possible locations of bears to visitors entering the backcountry. Delays of even a couple of days receiving the information could put visitors in danger. The NPS plans to continue requiring submissions prior to departing the park.

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

No payment or gift will be made to respondents.

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

No promise of confidentiality will be made, and we will not ask for any additional personal information. The NPS Privacy Act Officer recently determined the information collected via Form 10-406 is subject to the provisions the Privacy Act and he is working with the NPS Backcountry/Wilderness Program Manager to finalize and published a new Systems of Records Notice entitled "Servicewide Backcountry/Wilderness Use Permits System – NPS-26". We will update the SORN information in ROCIS as soon as the Notice is published in the Federal Register.

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 personal or sensitive nature will be asked.

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."

This collection targets backcountry and frontcountry visitors to GLBA. We estimate that we will receive 50 responses totaling 4 annual burden hours (rounded). We estimate the dollar value of the burden hours is \$136 (rounded). We used the below listed rates in accordance with Bureau of Labor Statistics news release <u>USDL-16-1808</u>, September 8, 2016, Employer Costs for Employee Compensation—June 2016, to calculate the total annual burden. Table 1 lists the hourly rate for all workers \$34.05, including benefits.

		_		Avg. Time /	Total	\$ Value
	Annual	Responses	Total	Response	Time*	Burden
Activity	Participants	Each	Responses	(min)	(hours)	Hours
NPS Form 10-405, "Tatshenshini–Alsek River Bear Report Form 1"	40	1	40	5	3	\$ 102.15
NPS Form 10-406, "Glacier Bay Bear Information Management (BIM) Report Form 2"	10	1	10	5	1	34.05
Total:	50	1	50		4	\$ 136.20

*rounded to match ROCIS

- 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.)
 - * 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.
 - * 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.
 - * 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.

This collection has no nonhour cost burden.

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 total estimated cost to the Federal government as a result of this collection of information is \$1,965 (rounded).

We used Office of Personnel Management Salary Table <u>2016-AK</u> to determine the hourly wages at the median step level. We used Bureau of Labor Statistics news release <u>USDL-16-1808</u>, September 8, 2016, Employer Costs for Employee Compensation—June 2016, to calculate the most current benefits rates for government employees and multiplied it by the hourly rate to obtain a fully burdened rate.

Action	Position and Grade	Hourly Rate	Hourly Rate including Benefits (x 1.57)	Total Annua I Hours	Annual Cost w/benefits
Protocol Development\Training	Wildlife Biologist GS-11/05	35.21	55.28	10	\$ 552.80
Field Implementation	Biology Tech GS-06/05	21.41	33.61	10	336.10
Field Implementation	Park Ranger GS-11/05	35.21	55.28	10	552.80
Field Implementation	Park Ranger GS-07/05	23.79	37.35	5	186.75
Administrative tasks	Biology Tech GS-06/05	21.41	33.61	10	336.10
Total				45	\$ 1,964.55

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

This is an existing collection in use without OMB approval.

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.

There are currently no plans to publish the information gathered from this collection. However, in the future, should GLBA decide to publish the statistics generated from the information collected (without corresponding personal information), we will work with the Bureau ICCO to ensure the information is approved for publication prior to doing so.

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.

We will display the OMB Control Number and expiration date on the form.

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.