

## **1Supporting Statement A for PRA Submission**

### **Special Park Use Applications (Portions of 36 CFR 1-7, 13, 20, and 34) Forms 10-930, 10-930s, 10-931, 10-932, and 10-933**

**OMB Control Number 1024-0026**

**Terms of Clearance:** None

#### **A. JUSTIFICATION**

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

The legislative mandate of the National Park Service (we, NPS), found at 54 U.S.C. 100101, is to conserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. Meeting this mandate requires the NPS to balance conservation with use. Maintaining a good balance requires both information and limits. Other legal authorities governing special park uses include:

- 54 U.S.C. 100101, The Organic Act--- "... The authorization of activities shall be construed and the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established . . . ."
- 54 U.S.C.100751(a), Rules and Regulations of National Parks – "The Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the use and management of the parks, monuments and reservations under the jurisdiction of the National Park Service . . . ."
- 54 U.S.C.103104, Recovery of Cost Associated with Special Use Permits -- "Notwithstanding any other provision of law, the National Park Service may ... recover all costs of providing necessary services associated with special use permits, such reimbursements to be credited to the appropriation current at that time."
- 54 U.S.C. 100905, Recovery of Costs Associated with Commercial Filming and Still Photography Permits -- "The Secretary of the Interior ... shall require a permit and shall establish a reasonable fee for commercial filming activities ... on Federal lands ... (and) shall also collect any costs incurred...."

Regulations governing special use permits are contained in portions of 36 CFR 1, 2, 3, 4, 5, 7, 13, 20, and 34.

The information we collect in the application allows the park manager to evaluate requests for a special park use permit. A special park use is an activity that takes place on park land or waters and meets the following criteria:

- Provides a benefit to an individual, group, or organization, rather than the public at large,

- Requires written authorization and some degree of NPS management to protect park resources and the public interest,
- Is not prohibited by law or regulation,
- Is not initiated, sponsored, or conducted by the NPS,
- Is not managed under a concession contract or commercial use authorization, and
- Is not managed through a lease.

**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.**

Special park uses cover a wide range of activities including, but not limited to, special events, First Amendment activities, grazing and agricultural use, commercial filming, still photography, construction and vehicle access. Permits are issued for varying amounts of time based on the requested use, but generally do not exceed 5 years. A new application must be submitted in order to request the renewal of an existing permit.

The likely respondents to this information collection are individuals; nonprofit organizations; commercial entities, such as commercial filming companies; and State, local, and tribal governments. The information is collected from respondents using forms:

- 10-930 (Application for Special Use Permit)
- 10-930s (Application for Special Use Permit) (short form)
- 10-931 (Application for Special Use Permit--Commercial Filming/Still Photography Permit) (short)
- 10-932 (Application for Special Use Permit--Commercial Filming/Still Photography Permit) (long)
- 10-933 (Application for Special Use Permit--Vehicle/Watercraft Use).

Each form is customized for each unit of the National Park system by the addition of the park's name, address, and the amount of the application fee. In the case of the 10-933, each park will use the application to request only the information necessary to evaluate the specific activity, such as off-road vehicle or snow mobile use or commercial vehicle access. Those questions on the form requesting information not applicable to the specific activity will be blacked out or deleted resulting in a lower time burden on the applicant.

Much of the information required is logistical, technical, or professional in nature. Many 10-930 applications for special park uses are submitted by individuals or representatives for private sector organizations for small events such as races, family gatherings and weddings (usually numbering less than 100 people), though other larger events numbering in the thousands are also requested. Applications for other activities, such as grazing or agricultural use, or vehicle access, may be submitted by individuals or the private sector.

Applications from State, tribal, or local governments are generally for the use of park lands. Commercial filming applications are generally submitted by a location manager or representatives working for the commercial filming company. The size and scope of most filming in national parks involves filming crews of less than 20 people, though permits involving crews of over 150 people are approved occasionally, generally less than 10 times a year. The amount of information submitted and the amount of time required to

complete the application increases with the complexity of the proposed activity. A still photography permit is required when the activity uses models, sets or props, enters an area closed to the general public, or requires management on the part of the NPS. Applications for still photography may be submitted by individuals, organizations, and the private sector.

Park managers use the information submitted on the form to determine if the requested use is consistent with the laws and NPS regulations referenced above and with the public interest. The park manager must also determine, based on the information received, that the requested activity will not cause unacceptable impacts to park resources and values. The information collected is not disseminated in any form to the general public.

**Form 10-930 (Application for Special Use Permit)**

The changes made to this form were format changes only. No new information is being requested.

<b>We ask for ...</b>	<b>So that we can ...</b>
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number	Process payment of fee and charges in accordance with the Debt Collection Improvement Act of 1996.
Description of the purposed activity	Determine if an activity is legally authorized and whether the activity would cause unacceptable impacts to park resources and values.
Requested location	Determine if the area is available, and if the proposed activity is appropriate for that area.
Requested dates and times of the proposed activity	Determine if the area is available, and the proposed activity does not conflict with other park operations or program or other permitted activities. Also allows a park to plan for a certain level and type of staffing at specific times.
Maximum number of participants and vehicles	Determine if the area is appropriate for the activity and plan park staff to manage the activity.
List of support equipment	Determine if the area can support the equipment associated with the planned activity without unacceptable impacts to park resources and values.
List of support personnel (i.e. contractors) and contact information	Determine if the area can accommodate the activity and we can contact support personnel about services they are providing, schedules of arrival and departure, any damage that might occur during the activity.
Contact information of the individual in charge of the permitted activity	Have immediate contact during a permitted activity to the individual charged with making decisions for the permittee.
Signature and Date	Certify that the information given on the application is correct.
The following are Yes/No check boxes:	
Is this an exercise of First Amendment Rights?	Determine the amount of fees and charges. Determine the appropriate area.

Are you familiar with /have you visited the area...?	Determine whether we need to request an onsite visit with the applicant.
Have you obtained a permit from the NPS in the past?	Check the administrative records for past permits to determine the size of past events, staffing levels, and any successes or problems experienced.
Do you plan to advertise or issue a press release...?	Estimate the number of individuals that may attend. Arrange to accommodate media.
Will you distribute literature?	Advise the applicant that we do not allow commercial advertising or literature and that this activity may require a separate permit.
Is there any reason to believe there will be attempts to disrupt, protest or prevent your event?	Plan for necessary staffing and security messages to facilitate the permitted event while protecting park resources and other visitors.
Do you intend to solicit donations or offer items for sale?	Advise the applicant that additional permits may be necessary.

**Form 10-930s (Application for Special Use Permit) (Short Form).** This form will be used primarily to schedule locations for small events with fewer participants, and less equipment and is a pared down version of Form 10-930. This form is primarily used to confirm areas for small, routine, recreational activities, such as picnic and sporting events. This form requests less information than the 10-930. Information on alternative times and locations is requested to provide the park with flexibility in scheduling the use, without having to contact the applicant.

We ask for ...	So that we can ...
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number	Process payment of fee and charges in accordance with the Debt Collection Improvement Act of 1996.
Description of the purposed activity	Determine if an activity is legally authorized and whether the activity would cause unacceptable impacts to park resources and values.
Requested location, dates and times	Determine if the area is available, and if the proposed activity is appropriate for that area.
Alternative location, dates and times	For parks with numerous requests for limited space, process the request without needing to go back to the applicant for additional information.
Maximum number of participants and vehicles	Determine if the area is appropriate for the activity and plan park staff to manage the activity.
List of support equipment	Determine if the area can support the equipment associated with the planned activity without unacceptable impacts to park resources and values.
Contact information of the individual in charge of the permitted activity	Have immediate contact during a permitted activity to the individual charged with making decisions for the permittee.
Signature and Date	Certify that the information given on the application is correct.
The following are Yes/No check off boxes:	

Is this an exercise of First Amendment Rights?	Determine the amount of fees and charges. Determine the appropriate area.
Are you familiar with /have you visited the area...?	Determine whether we need to request an onsite visit with the applicant.
Hunting season	Field will be used by parks where hunting is authorized. Field will be removed by parks if hunting is not authorized to avoid confusion by the public requesting a Special Use Permit.
Type of weapon	Field will be used by parks where hunting is authorized to ensure only authorized weapons are used. Field will be removed by parks if hunting is not authorized to avoid confusion by the public requesting a Special Use Permit.
State Hunting License No. or State Fish and Game Customer Identification No., Driver's License No. (If Different from Hunting License No.), State Issued, and Permit Confirmation Number (if purchased online)	Fields will be used by parks where hunting is authorized to ensure hunters possess the required state hunting permits. Field will be removed by parks if hunting is not authorized to avoid confusion by the public requesting a Special Use Permit.
Dates of hunting seasons and priority	Fields will be used by parks to allow permit applicants to indicate the season dates and prioritize their preference in seasons in the event their first choice is not available. Field will be removed by parks if hunting is not authorized to avoid confusion by the public requesting a Special Use Permit.
Arrival and departure dates	Fields will be used by parks to gather applicants' planned arrival and departure dates. This information is needed for safety reasons in the event a hunter needs to be located. Field will be removed by parks if hunting is not authorized to avoid confusion by the public requesting a Special Use Permit.

**Forms 10-931 & 10-932 (Commercial Filming/Still Photography).** Form 10-932 asks for more extensive information about the proposed activity and is used for larger projects or projects for which the scope is unknown. Form 10-931 requests information on fewer individuals associated with the project and less information on vehicles. Both Forms 10-931 and 10-932 have yes/no questions about previous filming permits with the Federal government.

We ask for ...	So that we can ...
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number	Process payment of fee and charges in accordance with the Debt Collection Improvement Act of 1996.
Project name, location manager, telephone number and cell phone number	Contact the local representative for the applicant during the application process.
Type of project - check boxes	Start to gauge the size of the activity and its potential for impact on park resources and the

	visitor experience.
Description of onsite activities	Gauge the scope of the activity and start to evaluate whether the activity would cause unacceptable impacts to park resources and values.
Do you intend to utilize talent (Form 10-932) including names and description of activity	Determine NPS staffing requirements. Filming involving sound recording has different logistical requirements.
Schedule by location by day including times, type of activity and number of cast and crew	Determine if the area is available, and if the proposed activity is appropriate for that area.
Description of backdrops, sets, props, etc., as well as electrical needs.	Gauge the size of the activity and its potential for impact on park resources and the visitor experience. Also specialized equipment requires special permit terms and conditions and could require special staffing from the NPS.
Proposed road usage (Form 10-932)	Evaluate the need for traffic restrictions or road closures, additional park staff or assistance from other law enforcement agencies. This also addresses some safety concerns.
Number and size of vehicles (by categories)	Determine if area can accommodate the number and size of vehicles or if other parking locations are needed.
Base camp location (with diagram) (Form 10-932)	Gauge the size of the activity and its potential for impact on park resources. Specialized equipment and special staffing from the NPS could be required.
Information on children on set, animals on set, aircraft, special effects, stunts or other hazardous activities and the person and contact information for each activity. (Form 10-932)	Determine whether activities require special permit terms and conditions. Requesting information about certification helps ensure that the activity is conducted safely, according to industry standards.
Signature and Date	Certify that the information given on the application is correct.
The following are Yes/No check boxes (yes answer requires further information):	
Have you physically visited the requested area?	Determine whether we need to request an onsite visit with the applicant.
Do you have, or are you applying for, a permit with another Federal, State or local government for this activity.	Coordinate our response and staffing with other agencies.
Have you obtained a permit from the NPS in the past?	Review the administrative records for past permits held by the applicant to determine the size of past events, staffing levels, and any successes or problems experienced.
Have you ever been denied a permit or had a permit revoked?	Review the administrative records to determine reasons for the denial of the application or revocation of the permit.
Have you forfeited a bond or other security for filming on Federal lands.	Review the administrative records to determine reasons for the forfeiture of the bond or security.
Are there any pending investigations against you	Consult with the authority pursuing the investigation

involving a commercial filming permit.	for information that would contribute to the permit decision process
Do you plan to advertise or issue a press release...?	Estimate the number of members of the public or media that may come to the park to watch the permitted activity because of the announcement.
Contact information for the permittee and staff, including name, title, telephone and cell phone numbers. (Form 10-932)	Contact the appropriate person if necessary during the application process or permitted activity.
Signature and Date	Certify that the information given on the application is correct.

**Form 10-933 (Application for Special Use Permit--Vehicle/Water Craft Use).** Parks are increasingly using special use permits to manage activities that involve the use of motorized vehicles, such as over sand/off-road vehicles, or watercraft. Form 10-930, which is the general application for special use permits, did not request the appropriate information needed to approve or deny a request for this type of activity. Individual parks will request only that information that is necessary for a specific activity and needed to make a decision on that specific type of permit request.

We ask for ...	So that we can ...
Type of permit	Issue a permit for the appropriate activity.
Name of applicant, address, telephone number(s), fax number	Contact the applicant during the application process or after issuing a permit.
Driver's license number, State, and expiration date.	Determine that individual may legally operate the vehicle. Copy of driver's license may be submitted in lieu of filling in information.
Social Security or tax identification number	Process payment of fee and charges in accordance with the Debt Collection Improvement Act of 1996.
Emergency contact name and telephone number	Notify contact in case of accident, when vehicle operator is injured or stranded
Vehicle/Watercraft Information: type of vehicle, VIN/ID number, license plate, state of issue, expiration date, year, make, model, color, weight, length, height, number of axles, inboard/outboard motor, number and size of motor.	Confirm that permit is being used on correct vehicle. Weight information is used to evaluate use restriction on certain roads or bridges. Copy of vehicle registration card may be submitted in lieu of filling in some of the information.
Insurance information (company, policy number).	Confirm vehicle insurance. Copy of insurance card may be submitted in lieu of filling in information.
Additional driver's license information	Ensure that all drivers- have legal driver's license.
Business information (for commercial vehicle permit) Type of business, business name, contractor license number, detail need for park roads.	Justify use of park roads for commercial vehicles not doing business with the NPS.
Requested duration of permit/start date	Issue the correct permit. Individual parks issue permits for varying lengths of time, from 1 day to 1 year. Some terms are specified by regulation.

Requested use area	Issue the correct permit. Permits are issued for specific locations, area or routes.
Signature and date	Certify that the information given on the application is correct. If the application was accompanied by permit terms and conditions the signature also certifies understanding of and willingness to comply with the terms and conditions.

**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.**

Currently most special park use applications are submitted to the park in paper format by either submitting the form in person, by post, or by fax. Forms may also be submitted as an email attachment. Increasingly, parks are posting either Word or PDF format applications on their websites and encouraging applicants to submit the form electronically, most often as an attached file to an email. The NPS is actively participating in the new DOI-wide “Electronic Forms System” (EFS) which will automate forms.

**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.**

There is no duplication. The information requested is site/activity specific and is not otherwise available in the NPS.

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

We require information to evaluate the potential impact of the proposed activity on park resources and values. Applications are received from the private sector, particularly for commercial filming. The NPS has developed two forms for photography/filming allowing the NPS to collect the minimum information necessary for NPS to make a decision. All forms request basic information, but encourage the applicant to include additional information pertinent to their request for particularly large, complicated, or unusual requests.

**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.**

The NPS legislative mandate is to preserve America’s natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. Our latest direction from Congress, expressed in Public Law 106-206 (June 2000) for commercial filming, specifically directs the Secretary to “not permit any filming, still photography or other related activity if the Secretary determines...there is a likelihood of resource damage; there would be an unreasonable disruption of the public's use and enjoyment of the site; or that the activity poses health or safety risks to the public.” The information collected provides the park manager with information necessary to evaluate the potential for resource damage or other negative impacts to park operations or the visitor experience and allows the park manager

to make an informed decision. Without the information collection, an informed decision would not be possible and in all likelihood, special park use requests would not be approved.

**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 circumstances that require 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 February 3, 2016, we published in the Federal Register (81 FR 5781) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on April 4, 2016. No responses were received.

In addition to the Federal Register notice, we contacted nine (9) individuals and asked for comments on:

- 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.
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

**Comments - Individual #1 (Form 10-930s)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: No
- 2) Q: How long do you estimate it will take you to fill out the form?  
A: 15 Minutes
- 3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: No
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: No

**NPS Response/Action Taken:** No action necessary.

**Comments - Individual #2 (Form 10-930s)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: No.
- 2) Q: How long do you estimate it will take you to fill out the form?  
A: 5 Minutes
- 3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: No.
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: No.

**NPS Response/Action Taken:** No action necessary.

**Comments - Individual #3 (Form 10-932)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: The biggest issue with these permits is that there is no consistent NPS process. It is different from Park to Park, and that is frustrating for an organization like ours that makes dozens of videos at numerous Parks.
- 2) Q: How long do you estimate that it took you to fill out the form?  
A: It took me ten minutes to complete the form.
- 3) Q: Do you have any suggestions on how the form or the overall application process could be improved?  
A: See my comment for No. 1.
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: See my comment for No. 1.

**NPS Response/Action Taken:** The NPS continues to stress consistency in the application process through policy and guidance, as well as the creation of e-course that are available as on line and instructor lead training courses offered several times a year.

**Comments - Individual #4 (Form 10-932)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: social security #
- 2) Q: How long do you estimate it will take you to fill out the form?  
A: 2 minutes
- 3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: No. It is streamlined and straight to the point
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: No it is fine

**NPS Response/Action Taken:** No action necessary.

**Comments - Individual #5 (Form 10-931)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: No
- 2) Q: How long do you estimate it will take you to fill out the form?  
A: 10-15 min.
- 3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: No
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: No

**NPS Response/Action Taken:** No action necessary.

**Comments - Individual #6 (Form 10-930s)**

- 1) Q: Did the form ask any questions you feel are unnecessary?  
A: No (pretty short). I did like the longer older form, it made you think through what you are proposing to do.
- 2) Q: How long do you estimate it will take you to fill out the form?  
A: 10 minutes - after I had our plans figured out and wrote up the description.
- 3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: Surprised how quickly it went. Appreciated your quick feedback on the changes we needed to consider. Communication was very timely.
- 4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: If you made the form any shorter, you really wouldn't need a form. Would be nice if it could be done online, or at least a fillable PDF.

**NPS Response/Action Taken:** NPS policy and guidance encourages parks to make their applications available to the public on line and in PDF format. Regional program managers conduct periodic reviews of park web sites to check the availability of the applications and offer assistance where necessary. The NPS is actively participating in the new DOI-wide "Electronic Forms System" (EFS) which will automate forms.

**Comments - Individual #7 (Form 10-930)**

- 1) Q: Did the form ask any questions you feel are unnecessary?

A: No

2) Q: How long do you estimate it will take you to fill out the form?  
A: Depends; but usually about 10 minutes

3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: Because we are doing regularly, it would be better if we can fill out the form once, effective for one month or more except we have some special events.

4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: If we can directly fill out the form on line without scanning or Fax.

**NPS Response/Action Taken:** Mr. Wu is applying for a permit to conduct a First Amendment activity. By regulation a permit for First Amendment activities may not be issued for longer than 14 days. Parks are being encouraged to post PDF files in a format that can be saved and sent to the park as an attached file.

**Comments – Individual #8 (Form 10-930)**

1) Q: Did the form ask any questions you feel are unnecessary?  
A: Negative. All questions were relevant

2) Q: How long do you estimate it will take you to fill out the form?  
A: 10 mins

3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: I felt the system worked very fast and rapidly

4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: The only suggestion would be maybe have an online system.

**NPS Response/Action Taken:** Parks are being encouraged to post PDF files in a format that can be saved and sent to the park as an attached file. The NPS is actively participating in the new DOI-wide “Electronic Forms System” (EFS) which will automate forms.

**Comments – Individual #9 (Form 10-931)**

1) Q: Did the form ask any questions you feel are unnecessary?  
A: My Social Security number. Home phone number, maybe. Fewer people have them.

2) Q: How long do you estimate it will take you to fill out the form?  
A: To simply fill out the form...maybe 10 minutes. To give a decent explanation of the work and the project.....probably a 1/2 hour.

3) Q: Do you have suggestions on how the form or the overall application process could be improved?  
A: It's a very complete form. It's well written.

4) Q: Do you have suggestions on how to lessen the time it takes to fill out the application?  
A: I don't feel it needs to take less time. Its fine. Two suggestions. Every permit officer has their own idea of how the COI [Certificate of Insurance] should be written. Whether it's Dept of Interior, United States of America, or National Park Service. There should be one choice. The majority of the time its United States of America. Every NHS should have ability to take credit card deposit and payment.

**NPS Response/Action Taken:** The NPS continues to stress consistency in the application process through policy and guidance, as well as the creation of e-course that are available on line and instructor lead training courses offered several times a year. Parks are being encouraged to enroll for the pay.gov program which allows payment with a credit card. Applications are being accepted from busier program first.

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Because the application process includes a financial transaction, under direction of the Treasury Department, the NPS collects social security numbers and/or tax identification numbers. The information is protected in accordance with the Privacy Act, and we will maintain the information in a secure system of records (Interior-NPS-1, 48 FR 51696)

**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.**

We do not ask sensitive questions.

**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.

We estimate that we will receive 33,735 responses totaling 11,916 annual burden hours. We estimate the dollar value of the burden hours is \$402,875 (rounded). We used the below listed rates in accordance with Bureau of Labor Statistics news release USDL-16-1150, June 9, 2016, Employer Costs for Employee Compensation—March 2016, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the total annual burden.

- Individuals. Table 1 lists the hourly rate for all workers \$33.94, including benefits.

- Private Sector. Table 5 lists the hourly rate for all workers as \$32.06, including benefits.
- Government. Table 3 lists the hourly rate for all workers as \$45.23, including benefits.

ACTIVITY	NO. OF RESPONDENTS	NO. OF ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE (HRS)	TOTAL ANNUAL HOURS*	HOURLY RATE W/BENEFITS	\$ VALUE OF ANNUAL BURDEN HOURS
<b>Form 10-930</b>						
Individuals	8,763	8,763	.5	4,382	\$33.94	\$148,725.08
Private Sector	3,559	3,559	.5	1,780	32.06	57,066.80
Government	516	516	.5	258	45.23	11,669.34
<b>Form 10-930s</b>						
Individuals	3,110	3,110	.25	778	33.94	26,405.32
Private Sector	1,441	1,441	.25	360	32.06	11,541.60
Government	310	310	.25	78	45.23	3,527.94
<b>Form 10-931</b>						
Individuals	412	412	.25	103	33.94	3,495.82
Private Sector	1,226	1,226	.25	307	32.06	9,842.42
Government	42	42	.25	11	45.23	497.53
<b>Form 10-932</b>						
Individuals	109	109	.5	55	33.94	1,866.70
Private Sector	945	945	.5	473	32.06	15,164.38
Government	19	19	.5	10	45.23	452.30
<b>Form 10-933</b>						
Individuals	13,050	13,050	.25	3,263	33.94	110,746.22
Private Sector	228	228	.25	57	32.06	1,827.42
Government	5	5	.25	1	45.23	45.23
<b>Totals</b>	<b>33,735</b>	<b>33,735</b>		<b>11,916</b>		<b>\$402,874.10</b>

\* Rounded to match ROCIS

**13. Provide an estimate of the total annual nonhour 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.**

While an application fee of between \$50 and \$200 is submitted with most applications to recover the cost of processing the application (54 U.S.C. 103104), we estimate the average fee per application is \$75. Therefore, we estimate that the annual nonhour cost burden associated with this information collection is \$2,530,125 (\$75.00 x 33,735)

**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.**

We estimate that the annual cost to the Federal Government to administer this information collection is \$3,197,403 (rounded) (33,735 applications \* \$94.78).

Employees who work with this information collection are located at parks Nationwide, some in locality pay areas. Initial submission may be made to a lower graded employee, while consideration of and decisions based upon the information are often performed at a higher level. The amount of time necessary for the NPS to process a request for a special park use permit varies widely, from less than an hour for small routine events (such as a picnic) or a still photography permit to several hours for a request for an agricultural permit or a moderate sized commercial filming request. If National Environmental Policy Act (NEPA) and National Historic Preservation Act compliance need to be completed for the request, the amount of time increases by many hours. The majority of Special Park Use Permit requests qualify for a categorical exclusion or a programmatic environmental assessment under NEPA and require little or no additional compliance.

To determine average hourly rates, we used Office of Personnel Management Salary Table 2016-RUS ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/RUS_h.pdf)) as an average nationwide rate. We used Bureau of Labor Statistics news release USDL-16-1150, June 9, 2016, Employer Costs for Employee Compensation—March 2016, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the most current benefits rates for government employees and multiplied it by the hourly rate to obtain a fully burdened rate. We estimate it will take staff an average of 2 hours to process each application.

<b>Position</b>	<b>Grade</b>	<b>Hourly pay rate</b>	<b>Hourly rate including benefits (1.57 x hourly rate)</b>	<b>Time spent on each application</b>	<b>Weighted average</b>
Clerical	GS 5/ step 5	\$17.55	\$27.55	10 minutes	\$4.59
Park Ranger	GS 9/ Step 5	\$26.59	\$41.75	80 minutes	\$56.67
Supv. Park Ranger	GS 11/Step 5	\$32.17	\$50.51	20 minutes	\$16.84
Park Superintendent	GS 15/ Step 5	\$63.74	\$100.07	10 minutes	\$16.68
Cost per application					\$94.78

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

We are estimating 33,735 responses totaling 11,916 annual burden hours, which is a net decrease of 4,730 responses and a net decrease of 266 burden hours from our previous submission. The decreases in both responses and burden hours are the result improved tracking of permits. Overall, we experienced an increase in the number of submissions using Forms 10-930 and 10-932; but this increase was counterbalanced by a larger decrease in the number of applications using Forms 10-930s, 10-931, and 10-933.

**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.**

NPS may use some of the data from the various applications to assist in measuring resource impact as a function of use. It is important to document how often a specific location is used for a special park use; i.e., a concert or festival, the length of the event, the amount of equipment and the number of participants to gauge the impact on park resources caused by this permitted activities. This data may then be used while creating management plans for park areas, such as setting visitor use limits. These plans are created through a process that encourages civic engagement and public involvement. However, no large-scale publication of the data is anticipated and no information specific to individual users will be published.

**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 forms.

**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.