

**Supporting Statement A**

**NPS Natural Sounds/Quiet Valuation Study**

**OMB Control Number 1024-0269**

**Terms of Clearance:** *This ICR is approved to conduct a focus group study only. As noted in the Supporting Statement, any further pilot study will need to be submitted in a separate ICR, along with any focus group study results that support the conclusion that further work is warranted.*

**Response:** In 2014 the U.S. Department of Transportation, Volpe Center (DOT) submitted the results of the focus group study to the National Park Service (NPS). For the visitor (use value) survey, DOT had difficulty recruiting sufficient numbers of participants to the in-park focus groups. The results of the groups, and subsequent peer review of the findings, indicate that fundamental aspects of the valuation scenario require revisions (i.e., framing, provision mechanism, and payment vehicle). The purpose of this request is to conduct additional in-park focus groups to address these issues.

The DOT report also described the results of general population focus groups conducted to scope and test a related non-use valuation survey. NPS is not seeking approval to conduct additional general population focus groups at this time. This request covers only in-park groups with visitors to test and refine aspects of the use-value survey.

## 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.**

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**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) Natural Sounds and Night Skies Division (NSNSD) is charged with protecting, maintaining and restoring acoustical environments throughout the National Park System. While the NPS has procedures in place to monitor and manage acoustical conditions in park units, it does not have information on the economic value visitors place on preserving natural sounds and/or reducing noise impacts. This information is necessary to ensure that management goals and policies are appropriately targeted and implemented.

Between 2011 and 2014, researchers at the U.S. Department of Transportation Volpe Center (DOT) requested and received OMB approval (OMB Control Number 1024-0269) to conduct a series of focus groups to pre-test materials for a stated-preference valuation study designed to estimate values for maintaining and enhancing natural soundscapes. The findings from the study indicated that in order to advance the project, another expert panel should be convened to determine how to address the issues raised by the focus groups. A subsequent peer review of this work commissioned by NSNSD indicated that fundamental aspects of the survey, notably the framing, presentation and format of the valuation scenario, required restructuring.

The purpose of renewed activity under this collection is to conduct additional focus groups to test and refine survey materials. Additional testing is necessary to ensure that the survey content, language, and instructions are functioning as intended and clearly understood by respondents. Failure to do so would compromise the accuracy and reliability of information collected through the survey if and when it is implemented.

This collection will provide information required by the following regulations and policies:

- **54 U.S.C. 100702 NPS Organic Act**

*"This act establishes and authorizes the National Park Service to conserve the scenery and the national and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

- **NPS Soundscape Management Policy 4.9**

*"Using appropriate management planning, superintendents will identify what levels of human-caused sound can be accepted within the management purposes of parks...in and adjacent to parks, the Service will monitor human activities that generate noise that adversely affects park soundscapes, including noise caused by mechanical or electronic devices. The Service will take action to prevent or minimize all noise that, through frequency, magnitude, or duration, adversely affects the natural soundscape or other park resources or values, or that exceeds levels that have been identified as being acceptable to, or appropriate for, visitor uses at the sites being monitored."*

- **[NPS Director's Order #47: Soundscape Preservation and Noise Management](#)**

*"It directs park managers to (1) measure baseline acoustic conditions, (2) determine which existing or proposed human-made sounds are consistent with park purposes, (3) set acoustic management goals and objectives based on those purposes, and (4) determine which noise sources are impacting the park and need to be addressed by management."*

- **NPS Cultural Soundscape Management Policy 5.3.1.7**

*"This section of the 2006 Management Policies states that, "The Service will preserve soundscape resources and values of the parks to the greatest extent possible to protect opportunities for appropriate transmission of cultural and historic sounds that are fundamental components of the purposes and values for which the parks were established."*

**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.**

Collected information will be used to refine valuation survey materials; specifically, to establish a credible valuation scenario that will elicit accurate and reliable use values for maintaining and enhancing natural soundscapes. This information is necessary to accurately evaluate the benefits and costs of actions NPS may take to protect park soundscapes.

In 2015, NSNSD retained a team of experts in non-market valuation, survey design, acoustical engineering and public lands management to conduct a review of the DOT work and provide recommendations for next steps.

The review of DOT survey materials and initial pre-testing results indicated that fundamental aspects of the valuation scenario required revisions; specifically:

- **Framing:** As currently described, the scenario features a single metric to describe current and alternative acoustical conditions, and is not explicit regarding noise sources. Respondents had difficulty differentiating among audio clips that were tested in conjunction with the questionnaire.
- **Provision:** The scenario does not describe the mechanism that translates respondent payment into noise reductions, compromising credibility.
- **Payment:** Options currently contemplated (trip costs, admission fees, taxes) have well-known practical and incentive-compatibility problems.

Additional focus groups will be conducted at a central location in two different NPS units - a western park and an eastern historic site. Four, two-hour focus group sessions with a maximum of 10 participants each will be held in each location (8 groups total). Potential participants will not be systematically sampled; however we will attempt to recruit a mix of participants in terms of age, gender, and ethnicity to the extent possible. An incentive will be offered to each person selected.

The groups will be moderated by a member of the peer review team, who has moderated over 150 groups on topics related to natural resources and valuation. The following topics will be discussed during each session:

#### **Introduction to Natural Sounds and Noise**

This section establishes context for the survey topic and definitions/examples for natural sounds and noise. Questions 1 and 2 encourage the respondent to reflect on these definitions/examples and relate them to their own visit/experience.

#### **Audio Clip Introduction and Noise Attributes**

Here participants will be introduced to the audio stimulus format that will motivate the valuation choice questions. Question 3 asks respondents to report reactions to the clips in an open-ended manner. Next, relevant noise characteristics that may be experimentally varied in the choice questions are defined. Question 4 is intended to help us understand how the respondent mentally maps the noises into these attributes through the use of a series of rating scales.

### **Reducing Noise Impacts**

In this section the potential harmful impacts of noise are noted in a general way and Question 5 asks respondents to reflect on whether any such impacts were experienced during their visit. Next, a program that would reduce noise impacts is introduced and explained. Questions 6 and 7 are designed to engage respondents on two critical aspects of the valuation scenario: program framing and payment vehicle.

### **Program Choice Questions**

The final section first orients respondents to the choice scenario and then presents the valuation choice questions (8, 9 and 10). The audio clips and fee amounts will be experimentally varied to gauge respondent evaluation of noise characteristics and sensitivity to price.

- 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.**

No automated or electronic techniques will be used to collect information. Focus group participants will listen to sounds clips via a digital audio device.

- 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.**

To our knowledge, other than the initial DOT work, no other agency is currently collecting acoustical valuation data related to national parks, nor are we aware of any studies published or otherwise.

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

This information collection will only involve park visitors and 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.**

Failure to revise and test the survey questions and the methodology will compromise the accuracy and reliability of information collected through the final version of the survey.

**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.

No special circumstances apply to this information collection.

**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 September 15, 2016, a Federal Register notice (81 FR 63492) was published stating our intention to submit an information collection request to OMB for approval for the collection described in this ICR. In this notice, public comment was solicited for 60 days, ending on November 15, 2016. Two comments were received, the first via email (October 31, 2016):

**Comment #1**

“I have reviewed the National Park Service’s (NPS) Proposed Information Collection; Natural Sounds/Quiet Valuation Survey, notice and request for comments that appeared in the September 15, 2016 Federal Register (81 FR 63492). According to the notice, the NPS plans to conduct a stated-preference survey of visitors in two park units in order to estimate individual values for maintenance of improvement of acoustical conditions within a national park setting, including a series of focus groups in two NPS units. This “sampling” of two NPS units is far too small for the NPS to determine park users objections to noise inflicted on our National Parks. In particular, Olympic National Park and Olympic National Forest continue to be adversely impact by U.S. Navy jets.

<http://blog.seattlepi.com/seattlepolitics/2015/05/11/is-noise-from-navy-jets-a-threat-to-olympic-national-park-kilmer-wants-soundings/>

In addition, the Navy has proposed expanded its electronic warfare testing over Olympic National Park and Olympic National Forest.

<http://www.military.com/daily-news/2015/11/09/navy-olympic-national-park-look-jet-noise.html>

In summary, the NPS proposed information collection will be woefully inadequate unless it includes Olympic National Park users.”

**NPS provided the following response on October 31, 2016:**

“Thank you for your response to the 60 day Federal Register Notice (81 FR 63492) dated September 15, 2016 for the Proposed Information Collection: Natural Sounds/Quiet Valuation Survey. To be clear, this request is not for the final study on this topic. This

request is for sole purpose of conducting a series of focus groups at two National Parks. These focus groups will be used test the reliability and to validate the questions we intend to use in the final version of the survey. In order to conduct these focus groups the request must receive OMB approval; therefore a Federal Register Notice is required. The questions will be calibrated as a result of the focus groups. We will not conduct a "full" survey until the questions are peer reviewed and deemed reliable by a panel of non-NPS social scientists. The final version of the survey will be submitted to OMB for review and a separate Federal Register Notice will be published at that time. Neither the date nor the parks to be used in the study have been determined. Thank you again and your comment and our response will be reported to OMB in our request for approval - of the focus groups."

The second comment was dated November 3, 2016 (received via mail November 7, 2016):

**Comment #2**

This is a summary of the comment, submitted by the American Motorcyclist Association, which addressed the following issues: 1) Whether additional data collection is necessary, and a request for consultation in drafting language for policies addressing excessive noise; 2) A recommendation to measure vehicle noise levels according to established methods, and to consider the implications of alternative study funding sources; and, 3) A request to consider alternative data collection modes that may be less burdensome to visitors such as internet administration or mail-back postcards.

**NPS response:**

Further refinement and testing of survey materials is necessary because previous focus group results, and an expert peer review, indicated that fundamental aspects of the valuation scenario and questionnaire were not functioning properly. No new noise measurement efforts will be conducted in conjunction with this study. Rather, existing recordings will be utilized to test respondent sensitivity to noise, and elicit a value for reducing or eliminating noises. To ensure that these audio recordings are properly and consistently administered to visitors in the full survey, it will be necessary to intercept them in the park units. NPS will take whatever measures are feasible to minimize respondent burden in the full survey.



As noted in response to question #2 above, NSNSD retained a team of experts in non-market valuation, survey design, acoustical engineering and public lands managers to conduct a review of the DOT work. A summary of their comments are highlighted below:

- A choice experiment is the appropriate stated-preference format to achieve study goals in a cost-effective manner.
- Valuation should focus on improvements in sound conditions due to practical and conceptual difficulties valuing decrements.
- Three fundamental features of the valuation scenario require revisions:
  - Framing: As currently described, the scenario features a single metric to describe current and alternative acoustical conditions, and is not explicit regarding noise sources. Respondents had difficulty differentiating among audio clips that were tested in conjunction with the questionnaire.
  - Provision: The scenario does not describe the mechanism that translates respondent payment into noise reductions, compromising credibility.
  - Payment: Options currently contemplated (trip costs, admission fees, taxes) have well-known practical and incentive-compatibility problems.
- Notable survey design issues included: the use of technical terminology and double-barreled questions, tense consistency, sequencing of other use and opinion questions, and demographic questions that do not conform to standard ACS format.

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

According to the NonProfit Times (2015), the value of a volunteer hour was estimated to be \$23.07 in the latest estimate released by Independent Sector (IS) (see: <http://www.thenonproffitimes.com/news-articles/volunteer-value-hits-23-07-an-hour/> - Retrieved October 25, 2016). Based on this figure we propose offering \$50 to each focus group participant. Each focus group session will be 2 hours. The funds will not be offered as “payment” for responses, rather it is intended to compensate for time and expenses to travel and participate in the session. On average, national marketing facilities offer participants upwards of \$75 for a two-hour session; therefore we propose that the requested amount is appropriate for the purposes of this study.

The decision to offer compensation is based upon the low participation rate in the DOT focus groups where there was no compensation. In that case, the study design indicated that 36 visitors would be selected to participate in the focus groups. However, only three-percent of solicited individuals agreed to and ultimately participated in the groups (n=13).

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

This work will be conducted in accordance with the Paperwork Reduction Act and under the guidance of the National Park Service. We will not provide any assurances of confidentiality, however all responses will be anonymous. The respondents' name and the responses will never be associated within the context of the results. Any personal information that could be used to identify individuals will only be used in the context of the focus group sessions.

**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 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 is a one- time collection that will consist of eight, two-hour focus group sessions held at two different NPS units (four per unit). We anticipate a maximum of 10 participants per session. The total burden for this collection is estimated to be 165 hours (Table 1). This includes the time to receive instructions and to complete the focus group session.

**Table 1: Estimated Annual Burden Hours**

Activity	Number of Responses	Estimated Burden per respondent (hours)	Total Burden (hours)
Initial Contact	100	.05	5
Focus Group Session	80	2	160
Total	180		165

We estimate the total annual dollar value of this collection to be \$5,618 (Table 2). The estimated dollar value of the burden hours takes into account the nature of our respondents which include individuals or households. We used the particular value of \$34.05 for civilian workers to estimate time costs. This estimated value includes the multiplier for benefits and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, for civilian workers (see: BLS news release USDL-16-1808 for Employer Costs for Employee Compensation - Table 1) — June 2016 at - <http://www.bls.gov/news.release/pdf/ecec.pdf> - released, September 8, 2016).

**Table 2: Estimated Dollar Value of Annual Burden Hours**

Activity	Total Annual Burden Hours	Dollar Value of Burden Hours (including benefits)	Total Value of Annual Burden Hours
Initial Contact	5	\$34.05	\$170
Focus Groups Session	160	\$34.05	\$5,448
Total	165	\$34.05	\$5,618

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.

There is no non-hour cost burden, recordkeeping nor any fees associated with collection of this information.

**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 annual (one-time) cost to the Federal Government for the eight focus group sessions proposed in this collection is estimated to be \$89,248. This includes the cost to the Federal Government for salaries and benefits for project management (Table 3) and operational expenses (Table 4).

We used the Office of Personnel Management Salary Table 2016-DEN ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DEN\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DEN_h.pdf)) to determine the hourly rate. We multiplied the hourly rate by 1.6 to account for benefits (as implied by the BLS news release USDL-16-1808, referenced above).

Table 3: Annualized Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time per task (hours)	Annual Cost
NSNSD Project manager	13/6	\$50.75	\$81.20	40	\$3,248

**Table 4. Operational Expenses**

Operational Expenses	Estimated Cost
<u>Contract and Project Support</u>	\$70,000
• Focus group administration	\$4,000
• Travel expenses	\$8,000
• Synthesis and reporting	\$4,000
• Participant compensation	
<b>Total</b>	<b>\$86,000</b>

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

This request is for the renewal of a previously approved collection. The results of the previous collection indicated that fundamental aspects of the valuation scenario and survey materials require revisions (i.e., framing, provision mechanism, and payment vehicle). The purpose of this request is to conduct additional in-park focus groups to address these issues. The adjustment in the burden is a net difference of 18 hours (Table 5). The previously approved collection included the burden for instruments that will not be used during this collection (e.g., the general population focus groups and all activities related to the on-site survey).

**Table 5. Burden Adjustment**

	Previously Approved Burden Hours	Current Requested Burden Hours	Difference
Initial Contact	12	5	-7
Focus Group Session	54	160	106
Gen. Population Focus Group Initial Contact and Session	99	0	-99
Computer Tablet Survey and Initial Contact	7	0	-7
Computer Tablet Debriefing	11	0	-11
<b>TOTAL</b>	<b>183</b>	<b>165</b>	<b>-18</b>

**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 results of the focus groups will be documented in a report to NPS NSNSD. The estimated schedule is as follows:

- Focus Groups at NPS Units April - June 2017
- Synthesis & Reporting July 2017

**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 OMB control number and expiration date will be displayed on all materials associated with this ICR.

**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.