

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**NATIONAL PARK SERVICE BACKCOUNTRY/WILDERNESS USE PERMITS
36 CFR 1.5, 1.6, and 2.10**

OMB CONTROL NUMBER 1024-0022

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 Backcountry/Wilderness Use Permit Application (NPS Form 10-404) and the Backcountry/Wilderness Use Permit Hangtag (NPS Form 10-404A) are used to implement the NPS backcountry reservation process and provide access into backcountry and designated wilderness areas where registration is required or limits are imposed in accordance with regulations. Such permitting enhances the ability of the National Park Service (we, NPS) to issue hazard warnings, conduct search and rescue efforts, and provide mission based resource protection.

The objectives of the permit system are to ensure: (1) requests by backcountry users are evaluated by park managers in accordance with applicable statutes and NPS regulations; (2) use of consistent standards and permitting criteria throughout the agency; and (3) to the extent possible, use of a single and efficient permitting document.

In 1976, we initiated a backcountry registration system in accordance with the regulations found at Title 36, Code of Federal Regulations, Sections 1.5, 1.6, and 2.10 (36 CFR 1.5, 1.6 and 2.10). The backcountry use permit system provides users access to backcountry areas of national parks with continuing opportunities for solitude, while enhancing resource protection and providing a means of disseminating public safety messages regarding backcountry travel.

The Backcountry Use Permit is an extension of our statutory authority and responsibility to protect the park areas we administer and to manage the public use thereof (Title 54 United States Code, Sections 100101, 100751, 320102 (54 U.S.C. 100101, 100751, 320102). 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.

In order to more accurately capture the burden associated with this collection, we changed the form number for the permit application. The permit application is now officially NPS Form 10-404 (previously approved by OMB as form 10-404A) and the hangtag is now officially assigned NPS Form 10-404A. Copies of the updated forms are uploaded to the appropriate ICs in ROCIS. In addition, the burden for both forms is now broken down between individuals/households, private sector, and state/local/tribal governments to more accurately reflect the appropriate burden for the issuance of the permits.

Form 10-404 (application) is used to collect information from a person who is applying for backcountry/wilderness trip that requires a permit. Form 10-404A (hangtag) is supplemental to and contains the same information collected on 10-404 (application). The hangtag is issued to the applicant when their permit is approved to serve as a reminder of their itinerary and verification that their trip was properly permitted in the event they are checked by field personnel for compliance purposes.

By designating access/travel routes and overnight camping locations, NPS backcountry and wilderness program managers can redistribute users in response to managing use, high fire danger; snow, water or wind hazard; bear activity; and other situations or incidents that may temporarily close a portion of the backcountry. We also use the permit system as a means of ensuring each backcountry user receives up-to-date information on backcountry sanitation procedures, food storage procedures, wildlife activity, trail conditions, outdoor ethics and weather forecasts so our concerns for visitor safety are met.

Not all parks will use Form 10-404 or 10-404A and some parks may collect the information using a customized form or non-form format (through discussions in person or over the phone, by sign-in sheet or self-registration system, by email, or by post card). In some instances, respondents will be able to provide information verbally. Because of the range of activities and the different management needs and resources at each park, applicants may not be required to answer all questions referenced in forms 10-404 or 10-404A. Depending on the requested activity, park staff will have the discretion to ask for less information than appears on the proposed forms. However, park staff may not ask for additional or different information. The burden listed in item 12 includes any non-form collection.

Each permittee must file an itinerary showing proposed access/travel routes and locations/campsites of overnight stays. The itinerary information is collected in form 10-404 and form 10-404A and is not collected through a separate process. In the event of an overdue hiker or the existence of emergency situations such as wildfires or other incidents that pose a risk to public safety, the information collected helps NPS personnel respond to search and rescue and/or emergency medical incidents that pose a threat to the health and safety of park visitors, including actions taken to evacuate or provide emergency assistance to visitors who have become injured or lost or exposed to hazardous conditions.

The backcountry/wilderness permit collects information on the amount, location, timing and type of backcountry/wilderness use. The amount of use is measured by the number of people and user nights. The location is indicated by the entry and exit trailheads and travel zone(s). The day of the week and season are shown by the date of entry and exit. The type of use (hiking, boating, stock trip) identifies the method of travel. This information monitors use levels and is necessary in order to identify any impacts to the resources. The collection of this information provides critical information to backcountry/wilderness managers, which can be used to accomplish mission based resource protection and to assure visitor enjoyment and safety.

The above information will be a vital tool in meeting park objectives and maintaining quality visitor experiences. The information will help:

- Administer and monitor visitor programs and facilities which protect park resources.
- Distribute visitor permits to ensure safety of visitors and protection of park resources.
- Ensure a quality visitor experience.
- Minimize resource disturbance and impacts and ensure the protection of natural, cultural and recreational resources.
- Determine facility, program, personnel and budget needs.

Forms will be provided by the parks and be available at backcountry reservation offices in the parks.

Respondents complete the form as they reach the trailhead or backcountry reservation office and before beginning their backcountry hike. A copy is retained by the respondent, and a copy is retained by the park. Backcountry users only need to fill the form out when they enter the backcountry for overnight stays. Day users will not be required to complete the form.

- 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.**

Requested information is unique to each applicant, and no other source is available. The information is generally collected at the trail head or backcountry/wilderness reservation/permit office on or near the day the backcountry/wilderness use starts. Although, stand-alone automated backcountry reservation systems may be available at selected parks, the NPS is actively working with Recreation.gov to provide a single automated system for the application process. We anticipate centralization of all automated application processed on Recreation.gov by the end of fiscal year 2018. Applications will continue to be accepted in person and on a walk-in basis at parks, when available.

- 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 backcountry/wilderness use.

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

This collection does not impose a burden on small businesses.

- 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/wilderness users do not present themselves as identifiable park users through any other statistical or visitor contact method. There is no other single opportunity to ensure uniform presentation of advisories, warnings and educational material.

- 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 September 14, 2016, the National park Service published in the *Federal Register* (81 FR 63203) 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 November 14, 2016. We received the following comment in response to that Notice:

Email from Rob Windmiller on 10/04/2016:

“Ms. Baucum,
I live near the Grand Canyon. It is about one hundred miles from my house to the back country permit office. The current system does not work for me because it requires a trip to the office to find out if there are available permits. That means the better part of the day driving and adding to traffic at the canyon just to find out if I can get one. Usually when I am looking for a permit it is for the North rim which is also a long drive South rim. I would be very happy if I could find out if there were available permits online and could get one, online. The current system causes extra traffic and keeps people out of the park who should be able to use it. Sincerely, Robert Windmiller”

NPS Response to Comment:

Dear Mr. Windmiller,

I am providing the following response to your comments of October 4, 2016 submitted by email to Madonna Baucum regarding Federal Register Notice (81 FR 63203) of our intent to request that OMB

renew approval for information collection regarding National Park Service backcountry/wilderness permits (Subject 1024-0022).

National Park Service Response: The National Park Service is in the process of establishing a service-wide online advance reservation system through the Recreation.gov program that would accommodate backcountry permit requests. In the meantime, Grand Canyon National Park offers the following options for obtaining a backcountry permit:

1. Fax request to the Backcountry Information Center, 928-638-2125.
NOTE: You can send a fax 24 hours a day, 7 days a week, 365 days a year - HOWEVER the first day of every month we receive many faxes and the number may be busy.
2. Mail request to Grand Canyon National Park, Permits Office, 1824 S. Thompson St., Suite 201, Flagstaff AZ, 86001
3. Bring request to the Backcountry Information Center, located inside the park on both the South Rim and the North Rim. The South Rim Backcountry Information Center is open daily, year round, for walk-in visitors from 8 am to noon and 1-5 pm Mountain Standard Time. The North Rim Backcountry Information Center (located in the administrative building) is open daily mid-May to mid-October for walk-in visitors from 8 am to noon and 1-5 pm Mountain Standard Time.

Please note: Permit requests are not accepted by telephone or by email.

Thank you for your interest in National Park Service backcountry recreational opportunities. If you have additional questions regarding Grand Canyon National Park please consult their backcountry permit webpage at <https://www.nps.gov/grca/planyourvisit/backcountry-permit.htm>

In addition to the Federal Register notice, we contacted the nine (9) individuals familiar with this collection to solicit feedback on NPS Forms 10-404 and 10-404A. Of those nine individuals, seven provided a response. Despite multiple attempts via email and at least one phone call to contact the remaining two individuals, we were unable to solicit feedback from them. Those contacted represented visits to large, medium, and small parks across the nation.

Title	Affiliation
Ms. P	Individual
Mr. R	Individual
Ms. K	Individual
Mr. S	Individual
Mr. S	Individual
Ms. K	Individual
Mr. B	Individual
Ms. B	Individual
Ms. M	Individual

Specifically, we 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”

Comments:

1. One response made note of two check off boxes on the 10-404 form that were duplicative (rock climbing and general camping).

2. One response discussed that In the Backcountry-Wilderness Use Permit Applications: Equipment section some of the questions seem overly detailed, such as the type and color descriptions for tents and bicycles and suggested that just asking for the quantity of such items would decrease burden on applicants with minimal loss of important information.
3. One response suggested that eliminating the requirement to list all climbing hardware would greatly decrease burden, especially for climbing trips that require a lot of hardware. One response suggested that the "footwear" and "backpack" sections seem unnecessary, and could create a large burden for large groups with lots of different types and sizes of items.

NPS Response/Action Taken:

- Comment # 1: The duplicative check-off boxes were deleted.
- Comment # 2 and 3: These questions were kept on the Form 10-404 as they are optional and only applied when a specific NPS unit has a public safety related reason to collect that information.

“The accuracy of our estimate of the burden for this collection of information”

Comments:

1. One comment stated that the time commitment it would take to complete the application (form 10-404) would depend on which segments were required to complete their trip and that on average it would take 3-5 minutes per page required.
2. One comment suggested that the Backcountry-Wilderness Use Permit Application (10-404 form) would take 8-10 minutes for short trips (1-3 days) with minimal required details (gear, itinerary, etc.) and 10+ minutes for longer trips with more information required and that the Backcountry-Wilderness Use Permit Hangtag (form 10-404A) would take 4 minutes or less.

NPS Response/Action Taken:

- Comment # 1: Many of the questions in the application are optional and dependent on the type of group or trip. It is not common for all of the optional questions to be applied.
- Comment # 2: Many of the questions in the application are optional and dependent on the type of group or trip. It is not common for all of the optional questions to be applied.

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

Comments:

1. One response suggested sending out a short online survey (such as those created using Survey Monkey or similar online survey tools) might result in a higher response rate compared to a full email with questions included in the text.
2. One response suggested that recording the time that visitors take to fill out each form might yield more realistic burden estimates, as the perceived time to fill out forms may differ significantly from the actual time. This could possibly be done by the staff members collecting and supervising form completion, or automatically if online application forms, kiosks, or iPads are used in place of paper forms.

NPS Response/Action Taken:

- Comment # 1: The National Park Service following standard protocol in soliciting feedback on the Form 10-404 and Form 10-404A. That protocol does not include an online survey instrument.

- Comment # 2: The National Park Service is in the process of establishing an online backcountry/wilderness permit application system.

“Ways to minimize the burden of the collection of information on respondents”

Comments:

1. One response made note of two check off boxes on the 10-404 form that were duplicative (rock climbing and general camping).
2. One response discussed that In the Backcountry-Wilderness Use Permit Applications: Equipment section some of the questions seem overly detailed, such as the type and color descriptions for tents and bicycles and suggested that just asking for the quantity of such items would decrease burden on applicants with minimal loss of important information.
3. One response suggested that eliminating the requirement to list all climbing hardware would greatly decrease burden, especially for climbing trips that require a lot of hardware. One response suggested that the "footwear" and "backpack" sections seem unnecessary, and could create a large burden for large groups with lots of different types and sizes of items.
4. One response stated that they didn't remember thinking that any of the information requested was a burden and suggested that an opportunity for improvement would be to move all NPS back country permit request systems to the online form/system.

NPS Response/Action Taken:

- Comment # 1: The duplicative check-off boxes were deleted.
- Comment # 2 and 3: These questions were kept on the Form 10-404 as they are optional and only applied when a specific NPS unit has a public safety related reason to collect that information.
- Comment # 4: The National Park Service is in the process of establishing a system wide online backcountry/wilderness permit system.

Additional comments received during the outreach: (if you received any add'l comments)

Comments:

1. One response stated that the backcountry/wilderness permit system was pretty straightforward.
2. Several responses indicated a positive impression of the NPS backcountry/wilderness permit system and n responses expressed displeasure with the system.

NPS Response/Action Taken: no action required.

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

We do not make any 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. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. The NPS Privacy Act Officer has determined this collection requires a Privacy Act System of Records Systems of Records Notification

(SORN). NPS SORN “Servicewide Backcountry/Wilderness Use Permit System – NPS-26” is currently in development and is expected to take 6-9 months to complete and publish. The NPS did not want to delay the submission of this renewal request and will provide OMB with the publication date and FR reference for the document via ROCIS as soon as it 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.

We do not ask questions of a sensitive nature.

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 319,200 responses totaling 35,454 annual burden hours. This represents a 12% increase in NPS backcountry/wilderness overnight use since 2014. We estimate the dollar value of the burden hours is \$1,237,359. We used the below listed rates in accordance with Bureau of Labor Statistics news release [USD-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016, to calculate the total annual burden:

- Individuals. Hourly rate for all workers \$34.90, including benefits.
- Private Sector. Hourly rate for all workers as \$32.76, including benefits.
- Government. Hourly rate for all workers as \$47.85, including benefits.

Activity	Annual Responses	Completion Time per Response (hours)	Annual Burden Hours*	Hourly Labor Costs including Benefits	Dollar Value of Annual Burden Hours
NPS Form 10-404, Backcountry/Wilderness Use Application					
Individuals	172,928	8 minutes	23,057	\$34.90	\$804,689
Private Sector	5,376	8 minutes	717	\$32.76	\$23,489
Government	896	8 minutes	119	\$47.85	\$5,694
NPS Form 10-404A, Backcountry/Wilderness Use Permit Hangtag					
Individuals	135,100	5 minutes	11,258	\$34.90	\$392,904
Private Sector	4,200	5 minutes	350	32.76	11,466
Government	700	5 minutes	58	47.85	2,775

Total	319,200		35,559		\$1,239,414*
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*rounded

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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 annual non-hour cost burden associated with this information collection.

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 for this collection of information is \$954,296 (rounded), based on an estimated 5 minutes spent by lower grade employees on each of the estimated 319,200 information collections and supervisory support (higher grade) based on an estimated average of one minute per each collection. All information collection is done by individual parks that provide backcountry permits with either Park Rangers or Visitor Use Assistants (average grade of GS-05) usually collecting the information.

To determine average hourly rates, we used Office of Personnel Management Salary Table [2017-RUS](#) as an average nationwide rate. We used the Bureau of Labor Statistics news release [USDL-17-0321](#), March 17, 2017, Employer Costs for Employee Compensation—December 2016, to calculate the most current benefits rates for government employees and multiplied the hourly rate by 1.59 to obtain a fully burdened rate.

Action	Position and Grade	Hourly	Hourly Rate	Total	Annual
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		Rate	(Incl. 1.59% Benefits)	Annual Hours	Cost*
Collecting Information	Park Ranger or Visitor Use Assistant (GS-05/05)	\$17.84	\$28.37	26,494	\$751,635
Supervisory Support	Park Ranger (GS-09/05)	\$23.49	\$37.35	5,426	\$202,661
Total					\$954,296*

*rounded

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

We are reporting a burden increase of 34,200 responses and 11,809 hours. This is primarily attributed to a 12% increase in the number of annual applications for backcountry/wilderness since the last reporting cycle.

We are reporting an increased cost to the government of \$288,346. This is primary attributed to a 12% increase in the number of applications received and needing to be processed compared to the last reporting cycle. It is also due to the addition of supervisory support which was not accounted for in previous submissions.

Previous submissions reflected the use of a single combined instrument that met the purposes of the application and the permit hangtag. This submission includes two instruments, the application for the permit and the permit hangtag. Both are completed and processed separately. This is a significant revision.

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.

We will not publish this information.

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 Form 10-404 which is printed locally and easily managed with the expiration date on the form. However, we are requesting permission to omit the expiration date on Form 10-404 (hangtag). Parks generally order hangtags in bulk from the Government Printing Office for a supply sufficient to last 1-2 years. If Form 10-404A (hangtag) is printed with the expiration date and is not used by that date, it may cause confusion with the public filling out 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.