

OMB Number: 0596-New.

<https://www.federalregister.gov/documents/2017/01/06/2017-00061/information-collection-significant-cave-nomination>

Respondent:

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Respondent Comments and Agency Responses

Associated Respondent Burdens:

(1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the agency, including whether the information will have practical or scientific utility;

- **The collection of information is critical** to the management of the interconnected surface/subsurface relationships. This is a primary function of the agency.

Agency Response: The collection of information is critical to the management of caves, directed by the Federal Cave Resources Protection Act of 1988.

- Practical use of significant cave information gathered should directly affect the area access, and surface management above the cave.

Agency Response: The practical utility of this information collection is in fulfilling the requirements of the Federal Cave Resources Protection Act of 1988, to nominate and designate significant caves.

- There are several scientific disciplines associated. Subsurface water direction and movement, cave microbe communities identification, biota, archeology, paleontology.

Agency Response: The information collection can provide initial scientific information about the nominated cave.

(2) The accuracy of the agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

- It appears that the burden statement of an estimated 10 submissions at 11 hours each assumes all of the field work has been completed, is retrievable, and **only** filling out the form is being included. This number grossly under estimates the total time and resources necessary to acquire the information.

Agency Response: This estimate is based on consultation with National Speleological Society members and the Department of the Interior Bureau of Land Management. It is important to consider that this is a) an estimate and b) only cursory information is required for the nomination of a significant cave, including a visit to the cave itself and initial inventory data. This takes into account approximately a one-day field visit and time to send information about the potential significant cave. Full cave mapping and comprehensive inventories can be included in the significant cave file at a later date. More time might be required for evaluation of the cave for significance after nomination. It is also important to consider that in many cases, information about inventoried caves already exists and so time to collect and send the currently available information on the potentially significant cave is all that is required for the nomination. We find the estimate to be appropriate for the nomination of a significant cave.

- The burden statement per response appears to be too large (11 hours) assuming this is for just filling out the form. A form taking 11 hours to fill out will be rejected by most. seems the annual burden is directed towards **new** responses. The 11 hour burden per response is too large. **It recommended an average of two hours burden to fill out each response** (the length of most major movies.)

Agency Response: Please see the response to the previous comment, above. This is an estimate taking into account potential information collection in the field for the response.

- The total number of responses (10) is low. There has been a 20+ year lull since the last set of submissions.

Agency Response: This estimate takes into account the current and past submission of nomination information only from the general public. Over the past 20 years there have been few, if any, submissions from the general public for significant caves through this information collection. However, the lack of submissions has only been from the general public. Many new significant caves have been nominated and designated over the past 20 years, but almost all nominations were submitted internally from Forest Service personnel, contractors, or volunteers. With no evidence that submissions from the general public will increase, the estimate of responses from the general public using this form is adequate based on historical and current data.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

- An electronic, recoverable form would standardize the information received.
- **The form needs to be simple, straight forward and not too long.** This is not a research paper.
- The form needs the ability to include attachments (photos, maps, scans)
- Posting a couple of examples will be helpful.
- If a standardized form is used, this would be an excellent opportunity to resubmit currently accepted significant caves to get them into the standard form format.

Agency Response: Thank you for your suggestions on ways to enhance the quality, utility, and clarity of the information to be collected. An opportunity to comment on the method of information collection developed will occur before the process is finalized.

(4) ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

- The respondents need a simple tracking mechanism for each submission. The submitter needs to be able to follow the progress from submission through to signing by the Forest Supervisor.
- The respondents need to be able to print the information submitted.
- The respondents need to be able to download a file of the information submitted so they do not have to retype the information.
- The respondents need to be able to modify the information as needed. For example, unclear statements can be modified and additional information can be added.

Agency Response: Thank you for your suggestions on ways of minimizing the burden of collection. They will be considered in relation to current agency capabilities and technology in the development of the method of information collection.

Associated USFS burdens that need to correspond to the Responses. This is not the Federal Register request but is closely related. There is some overlap from the above, but the perspective is from the USFS view.

(1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the agency, including whether the information will have practical or scientific utility;

- **The collection of information is critical** to the management of the interconnected surface/subsurface relationships. This is a primary function of the agency.
- Practical use of significant cave information gathered should directly affect the area access, and surface management above the cave.
- There are several scientific disciplines associated. Subsurface water direction and movement is one example. Cave microbe communities are another example.

Agency Response: Please see the response to (1), above.

(2) The accuracy of the agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

- The burden statement does not state if the estimated 10 submissions at 11 hours each are by District, Forest, Region, or National. If the submissions are a national annual total, the number will be low due to the improved reporting form being implemented, and the associated visibility. If the number is by Forest, the numbers will vary widely from zero to many. Let us assume the intent is the national form is used, and the information is forwarded to individual Forests. The problem arises when there is no one available at the Forest level to process the submission. See the next bullet.
- The burden statement appears to be incomplete. It seems the annual burden is directed towards **new** responses. However, there is an annual burden that is needed to address management of previous years of nominations. The 11 hour burden per response

appears too small. It does not include local field confirmation, or equipment or vehicles. Is this number intended to include review time by the Forest/District officer for each FCRPA category included for significance? Does this include Supervisor review time and signing?

- The total number of responses (10) is low. There has been a 20+ year lull since the last set of submissions.

Agency Response: Please see responses to (2), above. Again, the burden statement is specifically addressing the time it would take a member of the general public to fill out a new nomination form. This does not include agency personnel time in processing nominations or any other agency personnel time, equipment, or resources in any other aspect of this process. The comments relating to agency time and resources are outside the scope of this request for comment.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

- Here is an area where huge improvements can be made. From the Forests I have talked with, each Forest is creating their own GIS cave layer for data management, if it has been done at all over the last 20+ years. Further, there is little desire to implement a cave GIS layer by the Forest GIS person who already has too many items on his/her plate. If a cave GIS template were created at a national level that could be implemented at the Forest level then the reluctance to implement would go down and the information quality would go up.
- The issue is for those forests with a current cave GIS layer needing to convert to a standardized format.
- If the standardized GIS layer can be modified as needed at a regional level, it will allow for regional/forest variations.
- If the standardized form has exportable fields to a cave a standardized GIS layer, there will be a huge USFS savings at the Forest and District levels. Much of their background work will already be included. For example, Environmental Assessment preparation.

Agency Response: These comments are outside the scope of the request for comment. These comments do not address significant cave nomination by the general public.

(4) ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

- There needs to be a simple tracking mechanism for submissions. The submitter needs to be able to follow the progress of the submission through to the signing by the Forest Supervisor.
- The responsible Forest officer needs to be able to print the information submitted.
- The responsible Forest officer needs to be able to download a file of the information submitted.
- The responsible Forest officer needs to be able to modify that information.

Agency Response: Please see the response to item (4), above.