

The 2017 Supporting Statement Part A for OMB 0596-0110

NATIONAL VISITOR USE MONITORING

NOTE: The request is for the revision and extension of the National Visitor Use Monitoring (NVUM) survey. In a change from the previous collection, USDI Bureau of Land Management is no longer participating in this collection.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Statutes and Regulations:

- National Forest Management Act (16 USC § 1600-1614)
- Government Performance and Results Act of 1993 (GPRA), (Public Law 103-62)
- National Trails System Act (16 USC § 1241-1251)

The Forest Service regularly collaborates with the other land managing agencies in the areas of visitor monitoring and visitation estimation. Forest Service requests the revision and extension of the National Visitor Use Monitoring (NVUM) survey. The NVUM sampling protocol and survey instrument are designed to estimate the number of individuals who visit lands in the National Forest System (NFS).

Recreation is a key output identified in the Forest Service's strategic plan and in the **National Forest Management Act**. Credible science-based estimates of recreation visitation on National Forests provided by this collection are critical elements of Agency performance reporting, budgeting, and resource planning. The NVUM data is used to track the Agency's progress for the Forest Service's Performance Accountability Rating Tool (PART) documentation. The **Government Performance and Results Act of 1993 (GPRA)** requires that Federal Agencies establish measurable goals and monitor their success at meeting those goals. Also, the information collected is used when the Forest Service reports to Congress regarding the Agency's effectiveness in utilizing appropriated funds.

The information collection addresses two specific performance elements for the Forest Service: (1) the quantity of recreation visitation to the National Forest System, including Wilderness Areas managed by the agency, and (2) the level of customer satisfaction with recreation opportunities. Also NVUM results and data are a source of data and information in addressing forest land management planning, facility master planning, regional- and local-level agency-mandated business planning, national strategic planning, Civil Rights issues regarding service to minorities, and identification of a National Forest's recreation niche.

Change from previous collection: Text relating to use of this collection by the USDI Bureau of Land Management has been removed.

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- 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.**
- a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**
 - b. From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Table 1 (response to items a and b)

Information	Collected From
<ul style="list-style-type: none"> • Purpose of the visit to agency lands, home zip code, or country 	<ul style="list-style-type: none"> • All respondents
<ul style="list-style-type: none"> • Visit characteristics (duration, # sites visited, activity participation, lodging types used, travel distance, purpose of the trip away from home, overall satisfaction, and group size) 	<ul style="list-style-type: none"> • Respondents whose recreation visits ended the day they were interviewed
<ul style="list-style-type: none"> • Personal information (annual forest visit rate, race, age, gender) 	<ul style="list-style-type: none"> • Respondents whose recreation visit ended that day
<ul style="list-style-type: none"> • Calibration information for visitation proxy measures 	<ul style="list-style-type: none"> • Recreation visits ending the day the person was interviewed at sites collecting proxy measures
<ul style="list-style-type: none"> • Satisfaction/importance of facilities and services, crowding evaluation, accessibility reporting 	<ul style="list-style-type: none"> • 1/3 of respondents whose recreation visit ended that day
<ul style="list-style-type: none"> • Economic information (trip spending, income, substitute site) and facility usage 	<ul style="list-style-type: none"> • 1/3 of respondents whose recreation visit ended that day
<ul style="list-style-type: none"> • Region 6 addendum on recreation experiences 	<ul style="list-style-type: none"> • 1/3 of respondents in Washington and Oregon whose recreation visit ended that day
<ul style="list-style-type: none"> • Region 10 addendum on economic spending and trip destinations 	<ul style="list-style-type: none"> • 1/3 of respondents in Alaska whose recreation visit ended that day

- c. What will this information be used for - provide ALL uses?**

Visitation Estimates

Visit purpose, group size, and proxy calibration information are used to estimate the volume of recreation visits annually to each sampling unit, and to determine the expansion weights for each recreation response.

Unit-level visitation estimates are essential elements in land management and strategic planning. For example, NVUM results describe the existing

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condition and project the desired future conditions in Land and Resource Management Plans and Revisions. 'Visitation estimates' is one of three components used in allocating the National Engineering Road Maintenance Budget, and one of seven components in allocating the National Recreation Budget. Reports of visitation volume and visit characteristics to Wilderness are developed because these lands are important resources for the agency and the public. Estimates of average visits per day have been used to prorate visitation across portions of a forest (examples include Berryessa - Snow Mountain National Monument and San Gabriel Mountains National Monument) and to estimate the volume of recreation lost due to area closures associated with large wildfires or other natural disasters.

Change from previous collection: Examples for prorated estimates have been updated to more recent examples.

Summary Reports

Summary reports for each sampling unit are generated from individual information, including demographics, activity participation, visit duration, annual use rates, satisfaction and importance, facility usage, characteristics of Wilderness users, and perceptions of crowding. These reports are available in a public-facing web application (<http://apps.fs.fed.us/nfs/nrm/nvum/results>), and provide basic information used in unit-level planning documents. Aggregations of these are used for regional and national reporting, including civil rights, law enforcement, and Program Assessment Rating Tool reporting.

Change from previous collection: Web address for NVUM results app has been updated to be current.

Economic Spending, Resource Usage, and Local Contribution

Type of overnight accommodation, visit duration, and travel distance define the primary segments for visitor spending and estimate the share of visitation in each spending segment. Trip spending information assists in estimating average spending per visit within segments; combining numbers of visits in each segment by its average spending yields estimates of the total spending by visitors, which in turn allow estimates of economic impacts (jobs and Gross Domestic Product supported) of recreation. A key metric for the Secretary of Agriculture is how Department programs contribute to the welfare of rural communities.

Overlaying segment shares with participation in wildlife-related activities provides estimates of economic contribution of that program. Much of the work on spending segment and spending profiles goes into the Forest Service's Forest Economic Analysis Support Tool (FEAST), and into economic impact modeling.

The Alaskan Region, also known as Forest Service Region 10, is continuing with an additional series of questions on a subset of survey respondents, to (1) better estimate the economic contribution of recreation within the Region and (2) address forest plan recreation monitoring requirements in the Chugach and Tongass National Forests. Current sources of this information are limited and do not fully meet the needs described above. It would be most cost-effective to collect this information through the existing NVUM program. One particular problem has been estimating dispersed recreation

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use that occurs through outfitters and guides. While some research on the economic contribution of tourism has been conducted, far less has been done to estimate spending by local area residents spending associated with the two National Forests. The supplemental survey that was approved in the last collection cycle allowed the Region to make preliminary estimates of economic impacts, and several more years of data are required before those impact estimates can be considered to have statistical significance. The supplemental survey questions for this collection will also assist Region 10 Forests in addressing their forest plan monitoring requirements. Several Region 10 forest plan monitoring questions attempt to track the effectiveness of forest plan direction in meeting the demand for recreation opportunities on the forests. The current version of NVUM does not alone provide sufficient information to answer these questions, primarily because it does not collect specific geographic locations of forest recreation use, or modes of accessing remote forest lands. A systematic approach to this monitoring is desired and NVUM is the only existing program of this type available. The monitoring is required under the 1982 planning regulations.

Visitor Experience Information

In the Pacific Northwest Region, also known as Forest Service Region 6 (Washington and Oregon), recreation staff seek additional information about visitors experiences and motivation for recreating on a particular forest or at a specific site. This information has proven to be critically important to FS resource managers in identifying the niche of a particular forest and managing the recreation opportunities on the forest with that niche in mind. Understanding visitors' motivations and experiences can also provide resource managers with stakeholder (interested publics) input when making critical decisions related to the recreation planning and Facility Master Planning processes. A set of questions addressing recreation experience and motivation are added to the one-third of the surveys that has neither economic nor satisfaction questions.

Visitor Demand Models

Annual visitation rates combined with other individual data estimates recreation demand models. Results of the models assist in estimating net economic values and projecting visitation changes stemming from anticipated population changes. These results are useful in forest planning, recreation facility master planning, and in agency strategic planning and economic analysis. An example of this work is in:

White, E.M., J.M. Bowker, A.E. Askew, L.L. Langner, J.R. Arnold, and D.B.K. English. 2016. *Federal Outdoor Recreation Trends: Effects on Economic Opportunities*. Gen. Tech. Rep. PNW-945. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. October. 46p.

Change from previous collection: Citation has been updated to more recent research.

Visitor Travel and Activity Data

Travel distance information identifies the primary geographic market served by the forest. Comparing the activity mix of those visits with the overall

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recreation participation by the same population, helps define the forest's recreation niche. Linking usage rates for developed sites that have visitation proxy measures with operating cost information for the same sites enables computation of cost and supply curves for economic analysis. This information has been central to the Recreation Site Analysis process. In one FS region, the NVUM results are the data source for determining forests' recreation niche. In another region visitation volume and activity data are combined with satisfaction and economic data to evaluate forest recreation performance. In addition, both travel and activity data from NVUM are considered key sources for forest planning, and are referenced in field guidance for accomplishing forest plans.

Descriptions of a subset of visits engaged in selected activities, such as off-highway vehicle use or downhill skiing, have enabled development of reports describing specific visit subpopulations. Expectations are that similar subsets will be developed for users of particular facilities or resources, including interpretive centers or scenic byways.

Change from previous collection: Examples of use of activity data have been included in the justification.

Forest Road Systems

Results of maps of respondent ZIP codes and responses to visit purpose questions provide engineering staff with data to evaluate and better understand the variety of uses occurring on the forest road system.

Primary and Secondary Data for Forest Service and Academic Research

Information from this collection is used by the Forest Service scientists whose research examines a variety of recreation topics including: minority participation in outdoor recreation, components of visitor satisfaction, recreation and Wilderness demand, spending patterns and economic impacts of recreation on public lands, and Wilderness use and users. Research and results from NVUM data contribute to the state of the art in estimating recreation visits and the outcomes of those visits. Contributions have been made to each biennial occurrence of the international conference titled 'Measuring and Monitoring Visitor Flows in Recreation and Protected Areas'.

A number of research articles have used the NVUM data as the primary data source. Examples of several that are in review include:

Cho, S-H., J. M. Bowker, Donald B. K. English, Roland K. Roberts, Sinjung Youn. Effects of Travel Cost and Participation in Recreational Activities on National Forest Visits. *Journal of Forest Policy and Economics*. 40(2014):21-30

Sardana, K., J.C. Bergstrom, J.M. Bowker. Settings-based outdoor recreation demand: An application to Southern National Forests. *Journal of Environmental Management* 183-3(2016): 972-979.

Bowker, J.M., H.K. Cordell, N.C. Poudyal. Valuing Values: A History of Wilderness Economics. *International Journal of Wilderness* 20-2 August (2014):26-33.

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Bowker, J.M., A. E. Askew, H.K. Cordell, J.C. Bergstrom. 2013. Outdoor Recreation. In, Wear, D.N. and J.G. Greis, eds. The Southern Forest Futures Project. Gen. Tech. Rep. SRS-178. Asheville, NC: U.S. Department of Agriculture Forest Service, Southern Research Station. Pp: 161-182. <http://treesearch.fs.fed.us/pubs/44201>

Change from previous collection: Citations reference more current research.

d. How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they?

The majority of the information collected will be face-to-face onsite interviews. Agency personnel or contractors verbally interview respondents and record the responses on preprinted machine readable forms. The interviews are available in both English and Spanish.

Respondents are first presented with a laminated card that contains the following message: *“According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0596-0110. The time required to complete this information collection is estimated to average 10 minutes per response”.*

The only exceptions to face to face interviews are interviews scheduled at remote overnight accommodations where prior reservations from the public are required, such as for cabins in Alaska. To reduce agency staff and travel costs, interviews will be conducted by phone within a week after the scheduled use of the facility. Fewer than 250 of the total annual interviews for this program will be by phone.

e. How frequently will the information be collected?

National Forest sampling occurs on a five-year cycle. That is, surveys occur on about 20 percent of all forests in a given year, and surveys occur on each forest about once every five years. Surveys contact about 0.05 percent of the visits to any forest.

f. Will the information be shared with any other organizations inside or outside USDA or the government?

Once the data collection is complete, case weights that expand the sample to the population of National Forest recreation visits are attached to each individual recreation response. Summary reports describing the visit population at forest, regional, and national levels are publicly available over the internet. As well, this dataset is available to university researchers, government scientists, or others who request it.

Upon completion of sampling year and development of reports, data are migrated into the agency’s corporate information system; a software application developed in cooperation with the agency’s Natural Resource

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Management staff allows agency staff and the public to construct queries of the data and generate tabular reports.

g. If this is an ongoing collection, how have the collection requirements changed over time?

The collection requirements have changed very little since the inception of the NVUM collection in 2000, and have not changed at all in the last 12 years. The sampling approach for onsite contacts of recreation visitors has also been constant. One of the goals of the NVUM program is to maintain consistency in approach, to better enable estimation of trends through time.

Change from previous collection: Specialized questions for Region 10 are the same as in previous collection. Text referring to minor changes in the questions has been removed.

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.

For the present, agency personnel or contractors record responses on machine readable paper forms. At the beginning of the FY2020 survey year, the program will transition to use of electronic field data collection techniques.

Change from previous collection: Testing referenced in the previous collection has been completed. Text discussing testing during the collection has been removed.

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.

The NVUM program represents the only science-based large-scale (unit-level, regional, or national) effort for the Forest Service for monitoring visitation volume and concurrently describing salient characteristics of those visits. No other process exists for obtaining statistically valid or reliable descriptions of the full set of visitors or estimates of visitation at national, regional, or field unit (e.g. National Forest) levels. No previous collection instrument has attempted this level of statistical sampling at this scale. NVUM fills what would otherwise be a critical void for the Forest Service, as no other program exists to monitor human use of the National Forest System. Credible estimates of current levels and trends in recreation visitation data at the Forest, Region, and National levels are crucial for planning, policy making, and reporting purposes.

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

The NVUM program does not conduct interviews with small businesses or other small entities. Only information that small businesses, such as outfitters and campground concessionaires, already supply to the Forest Service through their normal business operations and special use permits is part of the visitation estimation process.

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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.

This NVUM process, as designed, meets the Agency's reporting and monitoring needs for a number of GPRA and other Congressional reporting requirements. NVUM collects data that are critical ingredients in planning and business decisions at all levels of the Agency including forest-level land management planning; regional, and forest-level agency business planning; regional and national master planning for facilities management; and regional and national strategic planning.

The agency's commitment to customer service, its accountability, its credibility with partners, and its budget appropriations are all dependent on current and accurate recreation use data. Data on recreation use trends, values, and local economic impacts are all part of Forest plans, national and regional strategic plans, and agency rural development programs. Information on the number of customers and their characteristics is essential to any business plan.

Sample sizes for the NVUM meet targeted goals of statistical accuracy. Reducing sample sizes could prevent the agency from reaching those statistical goals. Spreading data collection across more fiscal years (i.e. reducing the frequency of data collection on any Forest) would prevent accurate reporting by the Forest Service for Congressional and GPRA purposes; reduce ability to track trends in visitation patterns accurately; and negatively affect the timing of data collection for optimal use in forest planning. Inability to implement NVUM would prevent the Forest Service from meeting the specific GPRA reporting requirements that pertain to recreation and Wilderness use, customer satisfaction, and service to minorities.

Change from previous collection: Analysis evaluating the effects of sample reduction have been completed. Text referencing these analyses has been removed.

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;**

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- **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 secret, 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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

- 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The request for public comment was published in the Federal Register on 04/13/2017 (Document 2017-07488). One public comment was received. That was a general protest against collecting data regularly from the American public. The comment suggested a 5-year timespan between data collection efforts, which is consistent with the actual NVUM cycle.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Over the last 12-15 months, consultations have occurred by phone, email, and in meetings with the following individuals about sampling procedures, data elements, instructions, and data availability with regard to this collection:

Dr. Robert Burns, West Virginia University - 304 - 293 - 2941 ext. 2416

Dr. Christopher Leggett, Bedrock Statistics 603-524-4498

Dr. John Loomis, Colorado State University 970-491-2485

All three have research emphases and extensive experience in surveying recreation users of public lands. All three use the data from this collection in their research. All three have been consulted multiple times, and each has been solicited for recommendations regarding existing survey questions. In general, their opinions agree that having consistency through time is essential, and none recommended any modifications that might improve the collection.

USDA National Agricultural Statistical Service (NASS) was consulted when the sampling plan and approach was first developed. No changes have been made

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to the collection since that time. We regularly consult with a Ph.D. statistician, Dr. Stanley J. Zarnoch, with the Forest Service's Southern Research Station regarding analysis, estimation procedures, reporting results, and identifying areas for improvement.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

Due to the anonymous nature of these interviews, respondents cannot be identified, and therefore consultation is not possible.

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

Responses are voluntary and no payments or gifts are made to any respondents.

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

The names and addresses of respondents are not collected. Personal questions (i.e., questions about income levels and ethnicity) are shared with respondents in writing (laminated card) and individuals respond by saying or pointing to a number associated with the appropriate response. Information that might be used to try to identify particular individuals is limited to reported 10-year age categories, race and/or ethnicity, gender, and reported home ZIPCODE.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.

Interviewers do not ask questions of such a private nature. Individuals may withhold their age, race, gender, home ZIP code, annual household income or trip-related expenditures on recreation.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

This renewal submission is for 45,000 respondents and responses and 6,386 burden hours. Please refer to supplemental document entitled *0596-0110 2017 burden spreadsheet* for further detail of burden and cost estimates.

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Table 2: Total Number of respondents, Fiscal Years 2014-2016

(a) Description of the Collection Activity	(c) Number of Respondents		
	FY2014	FY2015	FY2016
FS -non-response	6,255	9,565	10,187
FS-Response	29,180	30,724	38,932
Total	35,435	40,289	49,119

The response totals for the last several years have been below the expected yearly number of respondents for two key reasons. Over the last three years, the completion rate of assigned fieldwork days has been about 95%. Since not all assigned field data collection occurred, the number of interviews obtained was somewhat less than expected. Second, some scheduled fieldwork days were assigned to sites that were unexpectedly closed due to natural phenomena such as wildfires, blizzards, or floods.

In this ICR, some forests expect intensification of their fieldwork in order to meet needs for greater spatial or temporal detail in visitation estimates. One example is to obtain visitation estimates for some National Monuments or National Recreation Areas managed by the Forest Service. The agency anticipates the number of respondents during this approval period will be higher than the previous 3-year period average.

The cost to respondents can be determined by the opportunity cost of the time they spend completing the survey. Results from the Current Employment Statistics Survey, from the Bureau of Labor Statistics shows that in May 2017 average hourly earnings were \$26.22 per hour for US workers. A rate of \$26 per hour is assumed for the period covered in this collection. In studies of the net economic value of outdoor recreation, standard practice is to value participant time at one-third of the wage rate. Since the opportunity cost of responding to this survey is time spent recreating, burden costs are assumed to be \$8.66 per hour.

Change from previous collection: Hours per response in the burden spreadsheet associated with this ICR are higher than those used in past approvals. The difference is that the very short response time for refusals for all forms is included in this spreadsheet into its own category; past spreadsheets have included the refusal burden time in the average response time for each specific survey form.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital**

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and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital operation and maintenance costs.

- 14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The NVUM program is funded as a part of the Forest Service's inventory and monitoring efforts. The amount allocated in the agency's budget amounts to about \$2.5 million per year, to cover all aspects of the training, supply purchases, on-site data collection, data entry and cleaning, and analysis.

- 15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

There has been a decrease in the estimated number of respondents to 45,000. The reduction reflects an increase in survey effort to dispersed settings with lower visitation volume. Most Forest Service visitation occurs in these settings, but the number of visits per day and hence the interviews obtained per day is not as large as in either developed settings or higher use settings. The redistribution of survey effort is intended to reduce the confidence interval width surrounding visitation estimates for any given national forest.

In relation to the overall reduced number of respondents/responses, the total burden hours are reduced to 6,386.

- 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The primary outputs of results from this collection are in unit-level, regional, and national tabulations of results which are published on-line, on the NVUM results application website (<http://apps.fs.fed.us/nfs/nrm/nvum/results>). Results of research publications based on the NVUM data are published in various conference proceedings, and in research journal articles. Please see partial list of publications under supplementary documents.

- 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 valid OMB control number will be displayed on all collection instruments.

FS requests continued permission to display the valid OMB control number, but to not display the expiration date on the machine readable forms that only FS personnel see. FS makes this request because the expiration date is the only change to the printing order from 5 year period to 5 year period. Due to the lead time needed to have such a large amount of these forms printed in advance, it is advantageous for both budgeting and efficiency purposes to print larger quantities in advance.

The valid expiration date will still be displayed on the laminated card containing the burden statement that is presented to the respondents prior to conducting the interview.

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18. Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."

The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.