

Supporting Statement A - OMB No. 0596-NEW

US Department of Agriculture Forest Service

The Whole Enchilada Trail: Conditions, User Experience and Comment Survey
and
Recreational Carrying Capacity Study

A. Justification

- 1. 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.**

The Moab Ranger District of the Manti-La Sal National Forest sits just outside Moab, Utah in the western United States. Moab is a small but expanding tourist town set amidst a surreal desert landscape. The town is surrounded by federally managed public lands including two National Parks—Arches and Canyonlands as well as millions of acres of Bureau of Land Management (BLM) lands and National Forest Service (NFS) lands. The growth of visitors to Moab, Utah has increased dramatically in the last 10 years, and very sharply over the last five year period. While much of this increase has since increased visitor numbers on National Park and BLM lands, the US Forest Service (USFS) has seen increased numbers over that same time period.

While this increased tourism has had positive effects on the local and state economies, it has come with damaging effects across all federally managed land in the area. Other agencies have conducted research and studies about tourism, use, user experience, crowding, ecological impacts and conditions surveys. However, the USFS in the Moab area has little to no such research and data available to help guide management decisions. In order to better manage Forest Service lands and provide more enjoyable user experiences, the Manti-La Sal National Forest, Moab Ranger District, is seeking Office of Management and Budget approval to conduct data collection through means of a survey to gather information about stakeholders' perceptions about current conditions, user experience and acceptable means of management on a very popular mountain bike trail—The Whole Enchilada.

The Whole Enchilada is a collection of interlinked trails that span over 30 miles across various ecosystems including alpine, riparian, aspen forests, mountain steppe, and desert, traveling across both USFS and BLM lands. It begins at 9600 feet above seas level and climbs up to 11,200 feet before descending over 7000 feet into the Moab Valley below. It is among the most premiere and popular mountain bike trails in the nation. While many visitors to the area come for the beauty of the surrounding public lands, there is a large contingent of tourists that come just to ride this trail. It has become a destination trail, otherwise known as a 'bucket list' trail. The Whole Enchilada trail has also seen increased use over the last decade and especially over the last 5 years. With the increased tourism

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in the Moab area and the commensurate increase of use on adjacent USFS lands, there is a necessity to manage this trail system to protect natural resources and provide the best user experience.

A Manti-La Sal National Forest 2013 *Needs Assessment and Resource Capability Guidance for Recreation Special Use Permits* (hereafter referred as “*Needs Assessment*”) is a document that provides guidance to the Recreation Program in order to promote and provide recreation opportunities by means of permitting outfitting and guiding special use commercial services. This *Needs Assessment* documents the 2012-2013 natural resource conditions, public need and demand of many outfitting services across the entire forest. It provides input on whether to issue more permits for certain activities and in specific areas. The *Needs Assessment*, while expansive and detailed, is outdated and needs to be amended. With current use and popularity of the Moab area, this document needs to be revisited and altered to better serve the Recreation Program and all stakeholders.

As use and popularity of the Whole Enchilada trail increases, so does the interest in applying for special use permits that serve and access this trail. The Moab Ranger District receives dozens of requests to use this section of trail for commercial purposes. There is definitely public demand for increased commercial use on the trail such as shuttle services, guided mountain bike trips, mountain bike instruction, and recreation events such as races. However, the *Needs Assessment*, states that “no additional commercial outfitter and guide permits will be authorized during the summer season until a carrying capacity study has been completed to determine what the physical and social carrying capacities are for this relatively small area” (MLSNF, 2013, page 14). The Recreation Program has begun the process of designing and conducting such a carrying capacity study. A large and necessary component of this study will be public perceptions about current conditions, user experience, crowding, and possible managerial decisions. This information, which will drive the social carrying capacity aspect of the study, will be collected in the form of a survey. This survey, *The Whole Enchilada Trail: Conditions, User Experience & Comment Survey 2019*, is the ‘collection of information’ that the Moab Ranger District is seeking to obtain OMB approval. Without public input the carrying capacity study would be incomplete and thus the US Forest Service would make managerial decisions without the necessary public comment that directly relates to the social carrying capacity aspect of the overall study.

The primary authorities for this collection are the National Agricultural Research, Extension, and Teaching Policy Act of 1977, as amended, which authorizes USDA agricultural research, education, and extension programs, and the Forest and Rangeland Renewable Resources Research Act of 1978, which authorizes USDA Forest Service “investigations, experiments, tests, and other activities... to obtain, analyze, develop, demonstrate, and disseminate scientific information about protecting, managing, and utilizing forest and rangeland renewable resources in rural, suburban, and urban areas” (Pub. L. 95-307 Sec. 3). Additional authorities that direct USDA to support agriculture and natural resources that are productive, sustainable, and provide benefits for the American public include the Rural Development Policy Act of 1980, which affirms USDA as the lead agency for rural development in the U.S. and expands the department’s leadership role through which multi-state, state, sub-state, and local rural development needs, plans, and recommendations are assessed and received on a continuing basis.

Information collected through this research contribute to USDA Strategic Goals, including ensuring USDA programs are delivered efficiently, effectively, and with integrity, and facilitating rural prosperity and economic development. It also contributes to Forest Service Strategic Goals of sustaining our nation’s forests and delivering benefits to the public.

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2. Indicate how, by whom, and for what purpose the information is to be used.

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.)

The Moab Ranger District of the Manti-La Sal National Forest is proposing the collection of information from stakeholders by means of surveys. This survey is seeking to obtain input on public activities or practices, perceptions and experiences regarding the Whole Enchilada Trail system. The data to be collected from this survey are as follows (See appendices for the survey itself):

- Limited demographic information such as sex, zip code, size of group and age
- User activity/type and self-described experience level, for example, Novice Mountain Biker or Advanced Backpacker
- Quantitative trail usage in 2019 and all previous years
- User access to US Forest Service lands and which trailheads were accessed
- Overall perceptions of current conditions along or associated with the Whole Enchilada trail system. Examples of conditions include facilities such as bathrooms and trailheads, parking adequacy, availability of information, availability of shuttle services and perceived value of those services, adequate signage and safety standards, crowding, and overall condition of the trail itself
- User experiences while on trail such as encounters or conflicts with similar or other use groups
- Perceptions about possible managerial actions by USFS land managers to protect resources and user experience

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.

The survey will be directed to actual users of the Whole Enchilada and those directly linked to the trail usage such as local businesses. Targeted and affected persons include public lands stakeholders: individuals and households, private sector businesses and non-profit organizations. Specific targeted groups and/or individuals will be those stakeholders that have accessed and used the trail system with the last several months and especially those that have just accessed the trail. This random sampling survey will be conducted at specific trailheads and exits that will target users coming off the trail. This will help ensure that those surveyed have the most recent experience and thus gather the 'freshest' and most accessible data.

Since this survey is random and seeks to collect information from any and all user groups willing to participate, there are no different respondent categories and all questions pertain to all survey respondents. The estimated number of respondents is around 750 (n=750) with minimum of 500 and a maximum of 1500. This equates to an average response rate of 50% over three separate methods of surveys: standard on-site surveys, mail-in surveys, and on-line surveys. (See appendices for estimated burden table and affected public.)

The surveys are voluntary and there is no requirement to answer or provide any information unwillingly. There will not be any pressure to fill out surveys nor monetary incentives given for surveys completed.

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

The results and related analyses produced from this information collection will be used by federal, state and local governmental agencies; academic intuitions, professors and students; nongovernmental organizations including for profit and non-profit organizations; and other individuals and groups interested in better understanding the effects of recreation on forest trails, the public's perceptions of use and management on this trail and the overall process and structure for constructing a carrying capacity study and survey. In particular, information from this collection will be used by:

- Moab Ranger District Recreation staff seeking to understand and more effectively manage public lands and resources such as the Whole Enchilada trail system. The data collected will be used to gauge the public's perception about conditions, user experience and managerial actions and aid in the management and development of the Whole Enchilada trail system. This will be used as the social carrying capacity data to complete a recreational carrying capacity study for the Whole Enchilada trail system. This data will also serve as baseline data to help monitor change and use on the trail itself, which will be used to provide better management overall.
- The data and subsequent carrying capacity study will be used by a Forest Service Recreation Specialist as a capstone (thesis) project for a Master's program from Utah State University. The Recreation Specialist is currently enrolled for the Masters of Natural Resources (MNR) program of study at the Moab extension of Utah State University. The graduate committee has approved the capstone project and understands that no survey/collection of information can take place without OMB approval. They have agreed, and recommended that OMB approval will not only substitute, but be required for their own Institution Review Board (IRB) approval for graduation from the MNR program. The carrying capacity study and adjoining survey are needed for more effective recreation management on the Moab Ranger District and doubles as a graduation requirement, which makes for a symbiotic project and process.
- Moab Field Office of the Bureau of Land Management (BLM) has already agreed to cooperate with the survey and carrying capacity process. They are requesting access to information collected as well as the carrying capacity study. Half of the Whole Enchilada trail system is on BLM jurisdictional lands and some of the survey sites are on BLM lands as well. The Moab BLM will use this data to help gauge public perceptions about their sections of the trail and help cooperatively and cohesively manage the Whole Enchilada.
- State and local governments may request this data to ascertain tourist visitation and possible actions such as tourism campaigns or setting public policy related to recreation/tourism.
- Academic institutions may seek to obtain such collected data for use in courses such as recreational resource management. Professors and students may seek to use the data to help create future surveys and carrying capacity studies.
- Non-governmental organizations may request and use this information to better understand and serve their clientele or associated user groups.

Findings from this research may be published in professional and academic literature to reach a broader range of stakeholders and interested parties. However, there is no plans to publish the information collected, nor the carrying capacity study. Data and findings may also be presented to government,

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private sector, and other organizations and actors through public meetings or other venues. Additionally, data and findings will be available to all interested parties upon request.

- 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?**

Information will be collected by means of a survey. There will be three methods of surveying—on-site, mail-in, and online. Each method has different response rates however, they will all have the same sampling size of $n=500$, for a total of 1500 maximum respondents at 100% response rate. With an average response rate of 50% (65% for on-site surveys, 10% mail-in, and 75% online), 750 is the estimated number of complete responses.

The survey is comprised of 20 questions of varying types such as multiple choice, yes or no, open-ended, likert scales, and matrices. It is 4.5 pages long with 1.5 pages of associated maps and information. Survey Monkey, an on-line survey website provider, has calculated that the average time to complete the survey will be about 13-15 minutes. The questions were formulated to provide the best information—data—from the respondents to fit the needs of the Moab Ranger District Recreation Program and the carrying capacity study. The survey was sent to prominent professors in the fields of recreation resource management, natural resource management, statistics and carrying capacity studies to help with overall quality and response rate of the survey.

On-site surveys will be conducted at several trailheads and exit points along the Whole Enchilada Trail. There will be several tables with chairs set up so respondents may complete the survey in comfort. The USFS will also provide shade and rain structures if needed. Each survey site location will have one or two USFS employees or volunteers to distribute the surveys and help respondents with any questions that may arise from the survey.

Mail-in surveys will be distributed at the same survey locations as the on-site stations. They will be given out to participants that are willing to complete a survey, but lack the time to complete the survey on-site. This will likely increase the willingness to participate in the survey, however, response rates for mail-in surveys are quite low and range from a 10-20% response rate. The surveys will be in self-addressed prepaid envelopes to both reduce any expenditures and burden on the public as well as increase possible response rates.

Online surveys will be disseminated using SurveyMonkey, which is a very popular and effective online survey website. SurveyMonkey has an agreement with GSA to provide survey services to government agencies. The online option will be offered to those individuals that wish to participate in the survey, but wish to do so on their own time and not be questioned in the field. All participants of the survey, regardless of the method, must have been on the trail within the last 3 months to ensure 'fresh' data. The easiest way to ensure 'fresh' data is to intercept trail users along specific areas on the trail. If they are willing to take the survey, they then have multiple options to complete the survey—on-site, mail in or online.

The online version of the survey has the exact same questions as does the paper forms. However, there are five more questions on the online survey. It is in order for SurveyMonkey to be able to organize, compile and present the data in a more efficient manner. Without breaking compound questions down into disparate questions, Forest Service staff would have to spend extra time sifting through data and

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manually entering data into spreadsheets. This online survey will be offered in similar ways as the mail-in method. SurveyMonkey will create a unique QR (Quick Response) Code that can be easily scanned to link respondents directly to the survey website. QR codes are much like barcodes for products that can be scanned or photographed at on-site survey locations or given out on small slips of paper so that respondents can complete the survey at their own convenience and in more comfortable settings. This QR Code will allow for participants to access the survey much like the mail-in option, however, response rates from on-line surveys are higher than traditional survey options. In addition, interested individuals can contact the Moab Ranger District to obtain the QR code so they can fill out. Individuals wishing to receive a copy of the online survey, may leave an email address in which USFS employees can send them the survey or a link to SurveyMonkey rather than using a QR code if that is their preferred method.

These three separate survey options will better serve both the respondents and the US Forest Service. Respondents will have options to choose from, thus reducing burdens and hopefully they will be more willing to complete surveys. The Forest Service will hopefully receive more completed surveys and thus have more robust statistics to analyze and provide a more accurate accounting of the public's perception about the Whole Enchilada Trail system.

While the Forest Service will use SurveyMonkey to help reduce some of the inconveniences of taking the survey, we will not use SurveyMonkey, email campaigns, or the internet to promote the survey. The survey is intended to be conducted on-site with a vast majority of respondents to be intercepted along the trail. If people contact our office and state that they have indeed been on the Whole Enchilada trail within the last 3 months, we will provide them with some version of survey. We can provide copies of the survey in our district office, mail them a copy of the survey, or provide them with a QR code to access the survey online.

Analysis –After the survey period, which will take place during the last two weeks of September and the month of October, and possibly until early November (depending on weather and responses received), the Recreation staff will compile all responses and carefully enter the data into spreadsheets. This data will then be used to produce usable statistics about the public's perception about the aforementioned aspects regarding the Whole Enchilada. Statistical analyses will include basic operations such as averages, frequency tables, and standard deviations. The raw data will be compiled into spreadsheets and used as descriptive metrics to help determine public sentiment about certain criteria about the Whole Enchilada.

This data and subsequent statistical analysis will be included in recreational carrying capacity study. The data will play a major role into whether the Manti-La Sal National Forest decides to amend the *2013 Needs Assessment* in order to allow for more commercial use on the Whole Enchilada. This data will also be very helpful as to future managerial actions in regards to resource protection and providing the best user experience to the public, whether or not they use commercial outfitting services. This data will also provide baseline data for future USFS land managers to compare shifts in public perception and allow for commensurate shifts in management practices.

e. How frequently will the information be collected?

The information will be collected during September, October and possibly November of 2019. This is peak season for use on the Whole Enchilada trail system. Recreation staff will be conducting surveys on weekends beginning the middle of September and continue until the end of October. The information collection will cease if the maximum responses (n=1500) are reached before that time. Collection may

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also cease, or even be extended, due to environmental conditions. The weather is very variable at the stated time of the year, and rainstorms and early snow storms can effectively shut down use of the trail on USFS sections at higher elevations. For example, in 2018 the first snowstorm was mid-October and stopped all use, while in 2017, the first major snow storm was late December, so use of the trail continued until then. While the Forest Service is requesting 3 year approval, it is only planned that the survey will be conducted in 2019, unless, due to uncontrollable circumstances, such as weather and snow, that the survey will have to be conducted in 2020 or 2021. If the survey is conducted in 2019 and the required responses are achieved, the Forest Service, will not need to conduct the survey beyond 2019.

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

Record-level (raw) data will be available to USFS Recreation and Department staff, as well as to BLM staff wishing to access such data. (The trail is divided between BLM and USFS jurisdiction.) No statistical summaries will be released that could potentially be used to identify individual respondents. Quantitative and qualitative summaries, with redacted PII, may be distributed through publications, online information sources, academic request, and other fora. These products will be available to governmental and public agencies, private organizations, and individuals.

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

This is a new request for collection (0596-NEW) that was initiated on October 31st, 2018. Therefore no collection requirements have changed over time.

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.

On-site surveys will have no automated or electronic collection techniques. There will be no audio or video recording of any portions of the survey and subsequent instructions or conversations about the survey with USFS staff or volunteers and the public. The mail-in option will also not use nor require any technological advancements. The online survey, through SurveyMonkey, will obviously use information technology to allow respondents to complete the survey. SurveyMonkey is an online website that allows respondents to access the survey using a QR code. This technological option will reduce the immediate burden on the public, however, it will still require 13-15 minutes (.25 hours) to complete. The online survey will allow respondents to complete the survey at their own convenience and possibly in more comfortable environments such as at home, in their accommodations, or at a restaurant. The Recreation staff believes that offering several options for respondents will reduce the overall burden on the public as a whole, but will still require around .25 hours to complete regardless. Furthermore, the use of SurveyMonkey will also reduce the burden upon the US Forest Service employees, as that service provides data compilation and statistical analysis as part of the costs of using the survey site.

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4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no data available that would duplicate the information that the Manti-La Sal National Forest Service is seeking to collect. There are similar carrying capacity studies that have involved public input about wilderness areas and other recreation sites, however, none of these are directly applicable to the collection request or the carrying capacity study specifically for the Whole Enchilada trails system. There are very few public comment surveys specifically related to mountain biking dominant trails in the United States and even less carry capacity studies about front country trails on public lands (aside from highly visited National Parks, such as Yosemite, Glacier and Yellowstone, however, those parks do not allow for multiple use on trails as does the USFS and BLM.) Recreation staff reached out to other agencies and professors across the nation to inquire about mountain specific carrying capacity studies and public surveys. No one had any knowledge of any such report or survey. While similar studies exist, the required data for this project does not exist.

The only approximate duplication of data required comes from the US Forest Service's National Visitor Use Monitoring (NVUM) surveying program. This occurs every 5 years and seeks public comment about various information such as demographics, financial spending and background, accommodations, purpose for visiting the forest, and so forth. While some of the data collected in the NVUM survey is duplicated in this requested information collection, it is limited to demographic information such as age, sex, group size and zip code. However, the NVUM does not collect the necessary data to complete the recreational carrying capacity. The last 3 NVUM surveys, spanning 15 years, will be used to assess trends and shifts such as activity type, average age of user, gender percentages of users (male/female), and visitor information by state residency (zip code).

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

The collection of information that will be used in to conduct a carrying capacity study will be used in determining the need to amend the *2013 Needs Assessment* that had placed a moratorium on any new commercial activities, including increased user days, related to the Whole Enchilada. This information collected in concert with the capacity study may find that both resource capabilities and public sentiment allow for more commercial use on this trail, thus there would be no burden. In fact, it would be a boon to local businesses and the economy were the *Needs Assessment* to be amended. On the other hand, if the report and public perception came back that use should not increase, there would be no additional burden on businesses. If the report in tandem with public input deems that use should be reduced, then there would be economic burden to local businesses.

There are about a dozen companies that assess and operate on the Whole Enchilada trail system. Recreation staff meets with these outfitters and guiding operations on a yearly basis to discuss operations and management plans for the Whole Enchilada trail as it affects their businesses. These small businesses have abided by all stipulations of their permits including the inability to add user days to permits, therefore, any burden caused by this information collection will likely be negated from the possible positive outcomes to their businesses. Each of the affected companies will be given the opportunity to complete the survey as well so they can provide their own input as well. Their input, as a specific stakeholder, commercial outfitter, will also be included in the carrying capacity study as well.

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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.

As discussed above, data gathered from this information collection are not available from other sources nor planned to be collected from other sources at this time. However, this information is critically important to the efficiency and effectiveness of current and future management actions by the US Forest Service. Without the collection of information from the survey, the carrying capacity will lack integral data about public perception on trail conditions, management options, and other comments that directly pertain to a recreational carrying capacity. Without this capacity study being fully complete, an honest representation cannot be presented and management would purely be administrative and speculative.

Without the requested information collection, the Moab Ranger District of the Manti-La Sal National Forest Service would not be able to properly manage this resource to its fully capacity nor be able to protect this resource as well. Small businesses and thus the users that want to more easily access this trail system will be burdened even more by fact that they may not be able to access the trail or have to pay higher fees because of permit stipulation non-compliance.

If the data described in this supporting statement are not collected, USDA and other Federal agencies may not be able to meet their legislative requirements under the National Agricultural Research, Extension, and Teaching Policy Act of 1977 and the Forest and Rangeland Renewable Resources Research Act of 1978, among several other requirements and goals as noted above.

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;**
 - ❖ There is no need to collect information more than the aforementioned months of September, October, and possibly November of 2019.
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - ❖ Such a requirement is not mandatory nor will such requirements be placed on respondents. However, respondent completion of the survey closer to the actual time they accessed the trail will help with accurate accounting and more honest perceptions encountered on the trail. Surveys received after December 31st, 2019 will not be used in the overall analysis and will be discarded.
- **Requiring respondents to submit more than an original and two copies of any document;**
 - ❖ There will be no need to submit any documents other than the original document of the survey, of which the USFS will supply during the on-site surveys and mail-in options. There are no paper documents associated with the online survey provided by SurveyMonkey therefore respondents will not need to provide duplicates of any paperwork in this information collection process.
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

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- ❖ There is no need, nor instruction, for respondents to retain any documents associated with the Whole Enchilada Conditions Survey. The records mentioned above are not asked for, nor required for any of the information to be collected in the survey.
- **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;**
 - ❖ While the survey results will be used to provide raw data that can then be analyzed to provide statistical data for public land managers, it has been drafted with the intent to provide valid and reliable results that can not only be generalized to the universe of study but also shared upon request as well. The underlying need for the survey is to indeed collect valid and reliable results of stakeholder views/perceptions to help guide managerial actions associated with the Whole Enchilada trail.
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - ❖ There will be no statistical data that will not be previously reviewed and subsequently approved by OMB. Supporting statement B will describe the statistical analyses to be conducted with the raw data from this collection of information. The data analysis will consist of basic statistical operations such as averages such as median, mean and modes, standard deviations, and frequency tables.
- **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;**
 - ❖ There will be no such pledge of confidentiality as there will be no data that requires such protection as there will be no PII collected as all surveys and questions are wholly anonymous.
- **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 not such requirements for this collection of information.

The collection of information will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5. There are no special circumstances associated with 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 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The 60-day request for public comment was published in the Federal Register on October 31, 2018, — (83 FR 54701).

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We received two comments. One comment was associated with the survey itself and the ability and desire to fill one out rather than commenting on the need for the collection of information from stakeholders. I responded to this individual and instructed him on the intent of this comment period. I ensured him that I would send him a survey once reviewed and approved by the OMB, but only during the collection period of September and October of 2019. The second comment was from a concerned individual that felt that the US Forest Service was mismanaging the lands and trying to maximize profit for the local stakeholders, nearby communities' economy and the US Forest Service itself. While her concern was genuine it was not germane to the requested comment framework. We did respond to her concerns and assured her that while the USFS does manage its lands to support local communities and their economies, they also balance that with appropriate management of its lands to provide natural resource management as required under laws such as Multiple-Use, Sustained-Yield Act (16 USC 528), National Forest Management Act (16 USC 1600), Forest Rangeland Resources Planning Act (16 USC 36), National Environmental Policy Act (42 USC 55) as well as the Manti-La Sal National Forest Service Forest Plan that uses the aforementioned laws.

The following individuals have reviewed the objectives, methods, and related materials developed for this information collection. They provided useful feedback on the research approach as well as the availability of data, and clarity of instructions. This feedback has been incorporated into collection materials and plans.

Steven Burr, Utah State University, Associate Professor: Environment and Society, Moab, UT; 425-797-5120, steve.burr@usu.edu

Troy Hall, Oregon State University, Professor and Department Head of Forest Ecosystems and Society, Corvallis, OR; 541-737-1306, Troy.Hall@oregonstate.edu

Jeffery Hallo, Clemson University, Associate Professor: Parks, Recreation and Tourism, Clemson, SC; 864-656-3237, jhallo@clemson.edu

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.

Efforts to consult with potential respondents and stakeholders to obtain their views on the availability of data, clarity of instructions, simplifying data collection processes, etc., may be undertaken as part of the testing or consultations with key informants that is conducted under this approval.

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 will be provided to any respondents. A modest non-monetary incentive (such as an energy/protein bar or gel) may be offered if possible and deemed appropriate. Such tokens will be nominal in value, and will be used to show gratitude for participation and to signify mutual respect between the researchers and participants.

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

This collection of information does not ask for any Personally Identifiable Information (PII) nor any data that could be deemed confidential. However, the raw data will not be distributed to any outside agencies other than other federal agencies that can demonstrate a valid need for such data. The Moab Field Office of the BLM will have access to all associated data from this survey as they are a direct cooperating agency and share jurisdiction of the trail that the survey is based upon. Again, there is no information that the USFS seeks to collect that contains PII or other sensitive information.

However, a confidentiality statement will be provided on the survey itself and will read as follows: "Participation in this survey is voluntary. Your statements and answers to questions will be kept anonymous and confidential and will be combined with those of others. The results will only be used to determine patterns and trends. No personally identifiable information will be included in the reporting of survey results."

In case of FOIA requests for specific information, we will disclose what is required by law. Personal or financial information would be kept confidential under FOIA exemptions 4 ("information that concerns business trade secrets or other confidential commercial or financial information") and 6 ("information that, if disclosed, would invade another individual's personal privacy").

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.

No such information of a sensitive nature will be asked or collected. Furthermore, survey participation is voluntary and there is no penalty for non-participation.

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.

- ❖ **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
 - a) Description of the collection activity**
 - b) Corresponding form number (if applicable)**
 - c) Number of respondents**
 - d) Number of responses annually per respondent,**
 - e) Total annual responses (columns c x d)**
 - f) Estimated hours per response**
 - g) Total annual burden hours (columns e x f)**

See attached "Table 1" for burden hour and response data.

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We estimate the total dollar value of the annual burden hours for this collection for respondents and non-respondents is \$5960.16 USD. We arrived at this figure by multiplying the estimated annual burden hours of 241.4 by \$24.69, the wage rate (including benefits) based on the Independent Sector national valuation of volunteer time for 2018. https://www.independentsector.org/volunteer_time. We used this rate because this survey will have participants that will have a wide range of people from a wide range of employments, cultural backgrounds, ages, locations, and life circumstances from across the United States and other countries as well.

Record keeping burden should be addressed separately and should include columns for:

- a) Description of record keeping activity:**
- b) Number of record keepers:**
- c) Annual hours per record keeper:**
- d) Total annual record keeping hours (columns b x c):**

No record keeping is required by respondents for this information collection.

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

See above

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

No capital operation or maintenance costs are required from respondents for this information collection.

- 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 response to this question covers the actual costs the agency will incur as a result of implementing the Information Collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- **Employee travel costs**
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

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The total cost to the Federal government for implementing this information request will be approximately \$13,743.40 - \$14,343.40 USD (Table 14.1). Labor costs are based on the estimated number of hours to complete each task, the grade level of the people required to complete it, and the salaries as reported in the Office of Personnel Management – 2018 Salary Tables specific to Utah. Other expenses were based on the proposed sample size and the prevailing costs for procuring the necessary materials, as follows:

Table 14.1 Estimated Budget Summary

ACTION ITEM	PERSONNEL	GS LEVEL	ANNUAL SALARY	1-YR INFORMATION COLLECTION TOTAL
Project oversight and coordination, data analysis	Recreation Specialist	9, step 1 @15% of time	\$50,598	\$7,589.70
outreach to recruit respondents, conducting interviews/surveys, data management and analysis	Forestry Technician (2 seasonal 1039 employees, work only ½ year)	5, step 1 @5% of time	\$16,697 (\$33,394 divided by 2, (half a year))	\$834.10 x 2= \$1669.70
Printing costs \$0.05-0.15 per page				\$300-900
Envelopes/Stamps				\$300
Survey Monkey Fees				\$384.00
Travel/Gas				\$2,500
Statistical Analysis Services				\$500
TOTAL				\$13,743.40- \$14,343.40 USD

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

This is a new request for information collections and thus there are no programs changes nor are any foreseeable during this collection of information. Those costs reported in Item 14, may increase or decrease due to cost of materials and associated resources such as gasoline. However, this will be minimal in nature unless prices fluctuate dramatically within the next year.

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

Results from the analysis will be presented in narrative, tabular, graphic, and other formats and presented directly to decision-makers, stakeholders, educational organizations and other land management agencies. The presentation and dissemination of research results and subsequent carrying capacity study will help further similar research, public land management and other natural resource management. Where requested and appropriate, presentations that summarize the data and findings will be shared with survey participants. There are no plans to publish the survey results or the accompanying carrying capacity study, however, they will both be available, once approved and completed, to any interested person or organization if requested and where appropriate.

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 and expiration date will be displayed on all Information Collection instruments. No exemption is requested.

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

The agency is able to certify compliance with 5 CFR 1320.

References Cited

MLSNF: Manti-La Sal National Forest. *Needs Assessment and Resource Capability Guidance of Recreation Special Use Permits on Manti-La Sal NF*. May, 14th, 2013.