

TO:: Office of Management and Budget (OMB)

FROM: U.S. Forest Service

RE: Generic Clearance 0596-0236

With the renewal of Generic Clearance 0596-0236, a total of 69,900 respondents, 69,900 responses, and 15,255 burden hours were requested and approved for the information collection (IC) package.

However, it has become apparent that this number of responses and burden hours will not be sufficient to meet the needs of Federal Land Management Agencies utilizing the Generic Clearance.

Unfortunately, in developing the estimates for the renewal of the Generic Clearance two key factors were not taken into account:

1. A number of previously approved surveys were "carried over" with the renewal of the generic clearance, and in doing so, the number of responses and burden hours from those surveys also carried over (and thus count against our total of 69,900 respondents, 69,900 responses, and 15,255 burden hours). The total burden for the surveys that were carried over is quite large -- nearly 19,000 respondents/responses and approximately 4500 burden hours.
2. Some agencies are using methods that require a significant number of initial contacts. For example, one agency plans to submit a package that includes a random sample of approximately 50,000 U.S. postal addresses across three states. This large sample is necessary in order to achieve 4,400 completed surveys. With the current level of approved responses/burden hours, our generic clearance cannot support this survey effort, and U.S. Forest Service has had to notify the agency that its IC cannot currently be submitted. Over the course of the next few years, there may other agencies that seek to use a similar mail-out methodology requiring a high number of initial contacts.

With the renewal of the generic clearance, the number of responses and burden hours was cut back, based on the use of the Generic Clearance during its first three years. However, the cuts were too deep, and not well planned. Indeed, there is likely to be an *increase* in the use of the Generic Clearance (compared to previous years), given that the renewal enables any Federal Management Land Management (FLMA) agency to utilize the clearance, and based on the increased emphasis that FLMA's are placing on performance management.

For the reasons described above, the U.S. Forest Service requests an increase in the number of respondents, responses, and burden hours for Generic Clearance 0596-0236. Ideally, U.S. Forest Service would like to see the burden estimates increased to 150,000 respondents, 150,000 responses, and 25,000 burden hours.

Thank you for your consideration.