

1 Supporting Statement A for Paperwork Reduction Act Submission

Special Park Use Applications (Portions of 36 CFR 1-7, 13, 20, and 34)

OMB Control Number 1024-0026

Terms of Clearance: None

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection

The legislative mandate of the National Park Service (we, NPS), found at 54 U.S.C. 100101, is to conserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. Meeting this mandate requires the NPS to balance conservation with use. Maintaining a good balance requires both information and limits. Our legal authorities governing special park uses include:

- 54 U.S.C.100751(a), Rules and Regulations of National Parks – “The Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the use and management of the parks, monuments and reservations under the jurisdiction of the National Park Service . . .”
- 54 U.S.C.103104, Recovery of Cost Associated with Special Use Permits -- “Notwithstanding any other provision of law, the National Park Service may ... recover all costs of providing necessary services associated with special use permits, such reimbursements to be credited to the appropriation current at that time.”
- 54 U.S.C. 100905, Recovery of Costs Associated with Commercial Filming and Still Photography Permits -- "The Secretary of the Interior ... shall require a permit and shall establish a reasonable fee for commercial filming activities ... on Federal lands ... (and) shall also collect any costs incurred....”

Regulations governing special use permits are contained in portions of 36 CFR 1, 2, 3, 4, 5, 7, 13, 20, and 34.

The information we collect in the application allows the park manager to evaluate requests for a special park use permit. A special park use is an activity that takes place on park land or waters and meets the following criteria: enough

- Provides a benefit to an individual, group, or organization, rather than the public at large,
- Requires written authorization and some degree of NPS management to protect park resources and the public interest,
- Is not prohibited by law or regulation,
- Is not initiated, sponsored, or conducted by the NPS,
- Is not managed under a concession contract or commercial use authorization, and
- Is not managed through a lease.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

Special park uses cover a wide range of activities including, but not limited to, special events, First Amendment activities, grazing and agricultural use, commercial filming, still photography, construction and vehicle access. Permits are issued for varying amounts of time based on the requested use, but generally do not exceed 5 years. A new application must be submitted in order to request the renewal of an existing permit.

The likely respondents to this information collection are individuals; nonprofit organizations; commercial entities, such as commercial filming companies; and State, local, and tribal governments. We collect information using the following forms:

10-930 - Application for Special Use Permit

10-930s - Application for Special Use Permit) (short form)

{NEW} 10-930c - Special Park Use Application/Permit – Climbing

**10-931 - Application for Special Use Permit--Commercial Filming/Still Photography Permit
(short)**

**10-932 - Application for Special Use Permit--Commercial Filming/Still Photography Permit
(long)**

10-933 - Application for Special Use Permit--Vehicle/Watercraft Use

Each form is customized for each unit of the National Park system by the addition of the park's name, address, and the amount of the application fee. In the case of the 10-933, each park will use the application to request only the information necessary to evaluate the specific activity, such as off-road vehicle or snow mobile use or commercial vehicle access. Those questions on the form

requesting information not applicable to the specific activity will be blacked out or deleted resulting in a lower time burden on the applicant.

Much of the information required is logistical, technical, or professional in nature. Many 10-930 applications for special park uses are submitted by individuals or representatives for private sector organizations for small events such as races, family gatherings and weddings (usually numbering less than 100 people), though other larger events numbering in the thousands are also requested. Individuals or the private sector may submit applications for other activities, such as grazing or agricultural use, or vehicle access.

Applications from State, tribal, or local governments are generally for the use of park lands. A location manager or representatives working for the commercial filming company generally submit commercial filming applications. The size and scope of most filming in national parks involves filming crews of less than 20 people, though permits involving crews of over 150 people are approved occasionally, generally less than 10 times a year. The amount of information submitted and the amount of time required to complete the application increases with the complexity of the proposed activity. A still photography permit is required when the activity uses models, sets or props, enters an area closed to the general public, or requires management on the part of the NPS. Individuals, organizations, and the private sector may submit applications for still photography.

Park managers use the information submitted on the form to determine if the requested use is consistent with the laws and NPS regulations referenced above and with the public interest. The park manager must also determine, based on the information received, that the requested activity will not cause unacceptable impacts to park resources and values. The information collected is not disseminated in any form to the general public.

Form 10-930 - Application for Special Use Permit

One question was added to the yes/no check boxes in response to the requirements of the John D. Dingell, Jr. Conservation, Management, and Recreation Act signed into law earlier this year. Any additional changes made to this form were format changes only

We ask for ...	So that we can ...
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number ¹	To recover any fees, charges or past due payment in accordance the Debt Collection Improvement Act of 1996.
Description of the purposed activity	Determine if an activity is legally authorized and whether the activity would cause unacceptable impacts to park resources and values.

We ask for ...	So that we can ...
Requested location	Determine if the area is available, and if the proposed activity is appropriate for that area.
Requested dates and times of the proposed activity	Determine if the area is available, and the proposed activity does not conflict with other park operations or program or other permitted activities. Also allows a park to plan for staffing at specific times.
Maximum number of participants and vehicles	Determine if the area is appropriate for the activity and plan park staff to manage the activity.
List of support equipment	Determine if the area can support the equipment associated with the planned activity without unacceptable impacts to park resources and values.
List of support personnel (i.e. contractors) and contact information	Determine if the area can accommodate the activity and we can contact support personnel about services they are providing, schedules of arrival and departure, any damage that might occur during the activity.
Contact information of the individual in charge of the permitted activity	Have immediate contact during a permitted activity to the individual charged with making decisions for the permittee.
Signature and Date	Certify that the information given on the application is correct.

The following question have Yes/No check boxes as responses	
We ask...	So that we can ...
Is this an exercise of First Amendment Rights?	Determine the amount of fees and charges. Determine the appropriate area.
Are you familiar with /have you visited the area?	Determine whether we need to request an onsite visit with the applicant.
Have you obtained a permit from the NPS in the past?	Check the administrative records for past permits to determine the size of past events, staffing levels, and any successes or problems experienced.
Do you plan to advertise or issue a press release?	Estimate the number of individuals that may attend. Arrange to accommodate media.
Will you distribute literature?	Advise the applicant that we do not allow commercial advertising or literature and that this activity may require a separate permit.
Is there any reason to believe there will be attempts to disrupt, protest or prevent your event?	Plan for necessary staffing and security messages to facilitate the permitted event while protecting park resources and other visitors.
Do you intend to solicit donations or offer items for sale?	Advise the applicant that additional permits may be necessary.
Is this permit to carry out a Good Samaritan Search and Recovery Mission?	Determine whether the request falls under the requires of an expedited application under the John D. Dingell, Jr. Conservation, Management, and Recreation Act was signed into law earlier this year. Under this law, Section 9002 includes the Good Samaritan Search and Recovery Act. The Act requires the

¹ See: OMB's 2010 "OMB Social Media Guidance" (page 6). Items necessary to complete a voluntary commercial transaction. If an agency collects information that is necessary for the selection, payment, or delivery of an item, or to identify the person ordering an item, such information is not subject to the PRA if used solely for the purpose of completing a commercial transaction. Similarly, agency use of web-based applications to conduct such transactions is not subject to the PRA.

We ask for ...	So that we can ...
	approval or denial of a request by the eligible organization or individual to carry out a good Samaritan search-and-recovery mission under this section by not later than 48 hours after the request is made.

{NEW} 10-930c - Special Park Use Application/Permit – Climbing

This form will be used to authorize climbing activities above 10,000 feet. Much of the information requested is similar in nature to information collected on other forms. However, the questions are formatted to gather specific information about the range of activities and the individuals participating in the activity in the event that the park must initiate search and rescue efforts.

We ask for ...	So that we can ...
Leader name, dates of activity, itinerary	Authorize the requested activity. We limit the number of climbers permitted to climb in excess of 10,000 feet at any one time.
Vehicle information	Determine whether a vehicle remains in the parking lot past the intended return date, which could indicate that there may be a problem. This information is requested for all vehicles associated with the climbing party.
Checkout information – date returned, number to the summit and route	This allows the park to confirm that the group has returned from the climb safely. It also provides the park with some statistical information to help document and gauge the impact of climbers on park resources.
Identification of party members	Information in this block is specific to each individual. We collect emergency contact information to use when necessary. Gauge the experience level of each individual authorized by the permit by asking for previous experience. Confirm that each individual has paid the annual fee that covers climbing activities for an individual for a year.
Personal and team equipment	Determine if each climbing group is properly outfitted with the equipment necessary to safely climb above 10,000 feet. This information also provides details should a search and rescue operation is needed. The question is a more detailed version of the question of other forms asking to “list support equipment”.

Form 10-930s (Application for Special Use Permit) (Short Form).

This form will be used primarily to schedule locations for small events with fewer participants, and less equipment and is a pared down version of Form 10-930. This form is primarily used to confirm areas for small, routine, recreational activities, such as picnic and sporting events. This form requests less information than the 10-930. Information on alternative times and locations is requested to provide the park with flexibility in scheduling the use, without having to contact the applicant.

We ask for ...	So that we can ...
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number	To recover any fees, charges or past due payment in accordance the Debt Collection Improvement Act of 1996.
Description of the purposed activity	Determine if an activity is legally authorized and whether the activity would cause unacceptable impacts to park resources and values.
Requested location, dates and times	Determine if the area is available, and if the proposed activity is appropriate for that area.
Alternative location, dates and times	For parks with numerous requests for limited space, process the request without needing to go back to the applicant for additional information.
Maximum number of participants and vehicles	Determine if the area is appropriate for the activity and plan park staff to manage the activity.
List of support equipment	Determine if the area can support the equipment associated with the planned activity without unacceptable impacts to park resources and values.
Contact information of the individual in charge of the permitted activity	Have immediate contact during a permitted activity to the individual charged with making decisions for the permittee.
Signature and Date	Certify that the information given on the application is correct.

The following are Yes/No check off boxes: These fields will only be on the forms in parks where hunting is authorized.

We ask...	So that we can ...
Is this an exercise of First Amendment Rights?	Determine the amount of fees and charges. Determine the appropriate area.
Are you familiar with /have you visited the area?	Determine whether we need to request an onsite visit with the applicant.

These fields will only be on the forms in parks where hunting is authorized.

We ask...	So that we can ...
Hunting season	Identify designated hunting season requested. We also ask for multiple dates so we can accommodate the request in the case that there are more requests than permits for a specific time period.
Type of weapon	Determine the type of weapon being used and identify the appropriate license and hunting season.
<ul style="list-style-type: none"> • State Hunting License No. • State Fish and Game Customer Id. No. • Driver's License No. • State Issued, and Permit • Confirmation Number (if purchased online) 	Determine that the applicant is legally authorized to hunt in the state where the park is located. The permit confirmation number is generated by pay.gov if the payment/application was submitted online
Arrival and departure dates	Locate hunters in the event of an emergency or a search and rescue effort

Forms 10-931 & 10-932 (Commercial Filming/Still Photography).

Form 10-932 asks for more extensive information about the proposed activity and is used for larger projects or projects for which the scope is unknown. Form 10-931 requests information on fewer individuals associated with the project and less information on vehicles. Both Forms 10-931 and 10-932 have yes/no questions about previous filming permits with the Federal government.

We ask ...	So that we can ...
Name of applicant, organization, address, phone number, fax number, and email address	Contact the applicant during the application process or after issuing a permit.
Social security or tax identification number	To recover any fees, charges or past due payment in accordance the Debt Collection Improvement Act of 1996.
Project name, location manager, telephone number and cell phone number	Contact the local representative for the applicant during the application process.
Type of project - check boxes	Gauge the size of the activity and its potential for impact on park resources and the visitor experience.
Description of onsite activities	Gauge the scope of the activity and start to evaluate whether the activity would cause unacceptable impacts to park resources and values.
Do you intend to utilize talent (Form 10-932) including names and description of activity	Determine NPS staffing requirements. Filming involving sound recording has different logistical requirements.
Schedule by location by day including times, type of activity and number of cast and crew	Determine the availability and appropriateness of the proposed activity for the requested area.
Description of backdrops, sets, props, etc., as well as electrical needs.	Gauge the size of the activity and its potential for impact on park resources and the visitor experience. Specialized equipment requires special permit terms and conditions and could require special staffing from the NPS.
Proposed road usage (Form 10-932)	Evaluate the need for traffic restrictions or road closures, additional park staff or assistance from other law enforcement agencies. This also addresses safety concerns.
Number and size of vehicles (by categories)	Determine if area can accommodate the number and size of vehicles or if other parking locations are needed.
Base camp location (with diagram) (Form 10-932)	Gauge the size of the activity and its potential for impact on park resources. Specialized equipment and special staffing from the NPS could be required.
For information about children and animals on set, aircraft, special effects, stunts or other hazardous activities and the person and contact information for each activity. (Form 10-932)	Determine whether activities require special permit terms and conditions. Requesting information about certification helps ensure that the activity is conducted according to industry standards.
Signature and Date	Certify that the information given on the application is correct.

The following are Yes/No responses (answering yes requires additional information):

We ask...	So that we can ...
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Have you physically visited the requested area?	Determine whether we need to request an onsite visit with the applicant.
Do you have, or are you applying for, a permit with another Federal, State or local government for this activity?	Coordinate our response and staffing with other agencies.
Have you obtained a permit from the NPS in the past?	Review the administrative records for past permits held by the applicant to determine the size of past events, staffing levels, and any successes or problems experienced.
Have you ever been denied a permit or had a permit revoked?	Review the administrative records to determine reasons for the denial of the application or revocation of the permit.
Have you forfeited a bond or other security for filming on Federal lands?	Review the administrative records to determine reasons for the forfeiture of the bond or security.
Are there any pending investigations against you involving a commercial filming permit?	Consult with the authority pursuing the investigation for information that would contribute to the permit decision process
Do you plan to advertise or issue a press release?	Estimate the number of members of the public or media that may come to the park to watch the permitted activity because of the announcement.
Contact information for the permittee and staff, including name, title, telephone and cell phone numbers. (Form 10-932)	Contact the appropriate person if necessary during the application process or permitted activity.
Signature and Date	Certify that the information given on the application is correct.

Form 10-933 (Application for Special Use Permit--Vehicle/Water Craft Use).

Parks are increasingly using special use permits to manage activities that involve the use of motorized vehicles, such as over sand/off-road vehicles, or watercraft. Form 10-930, which is the general application for special use permits, did not request the appropriate information needed to approve or deny a request for this type of activity. Individual parks will request only that information that is necessary for a specific activity and needed to make a decision on that specific type of permit request.

We ask for ...	So that we can ...
Type of permit	Issue a permit for the appropriate activity.
Name of applicant, address, telephone number(s), fax number	Contact the applicant during the application process or after issuing a permit.
Driver's license number, State, and expiration date.	Determine that individual may legally operate the vehicle. Copy of driver's license may be submitted in lieu of filling in information.
Social Security or tax identification number	To recover any fees, charges or past due payment in accordance the Debt Collection Improvement Act of 1996.
Emergency contact name and telephone number	Notify contact in case of accident, when vehicle operator is injured or stranded

We ask for ...	So that we can ...
Vehicle/Watercraft Information: type of vehicle, VIN/ID number, license plate, state of issue, expiration date, year, make, model, color, weight, length, height, number of axles, inboard/outboard motor, number and size of motor.	Confirm that permit is being used on correct vehicle. Weight information is used to evaluate use restriction on certain roads or bridges. Copy of vehicle registration card may be submitted in lieu of filling in some of the information.
Insurance information (company, policy number).	Confirm vehicle insurance. Copy of insurance card may be submitted in lieu of filling in information.
Additional driver's license information	Ensure that all drivers have legal driver's license.
Are you a year-round resident?	THIS IS A NEW QUESTION for Fire Island National Seashore (only) as required by special regulation 36 CFR 7.20(a)(8)(ii)(A)
Business information (for commercial vehicle permit) Type of business, business name, contractor license number, detail need for park roads.	Justify use of park roads for commercial vehicles not doing business with the NPS.
Requested duration of permit/start date	Issue the correct permit. Individual parks issue permits for varying lengths of time, from 1 day to 1 year. Some terms are specified by regulation.
Requested use area	Issue the correct permit. Permits are issued for specific locations, area or routes.
Signature and date	Certify that the information given on the application is correct. If the application was accompanied by permit terms and conditions the signature also certifies understanding of and willingness to comply with the terms and conditions.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.

Currently, most special park use applications are submitted to the park in paper format by either submitting the form in person, by mail, or by fax. Forms are also submitted as an email attachment. Increasingly, parks are posting either Word or PDF format applications on their websites and encouraging applicants to submit forms electronically, most often as an attached file to an email.

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 duplication of effort. The information requested is site/activity specific and is not otherwise available in the NPS.

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

We require information to evaluate the potential impact of the proposed activity on park resources and values. Applications received from the private sector, are particularly for commercial filming. There are two forms for photography/filming allowing the NPS to collect the minimum amount of information necessary for NPS to make decisions. All forms request basic information, but encourage the applicant to include additional information pertinent to their request for particularly large, complicated, or unusual requests.

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.

The NPS legislative mandate is to preserve America's natural wonders unimpaired for future generations, while also making them available for the enjoyment of the visitor. In Public Law 106-206 (June 2000) for commercial filming, Congress specifically directs the Secretary to:

"not permit any filming, still photography or other related activity if the Secretary determines...there is a likelihood of resource damage; there would be an unreasonable disruption of the public's use and enjoyment of the site; or that the activity poses health or safety risks to the public."

The information collected authorizations the park manager to evaluate the potential for resource damage or other negative impacts to park operations or the visitor experience and allows the park manager to make an informed decision. Informed decision would not be possible and in all likelihood, special park use requests would not be approved without this information.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

- * in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no circumstances that require us to collect the information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On May 28, 2019, we published in the Federal Register (84 FR 24538) a notice of our intent to request that OMB renew approval for this information collection. In that notice, we solicited comments for 60 days, ending on July 29, 2019. No public comments were received. In addition to the Federal Register notice, we contacted nine (9) individuals and asked for comments on:

- whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.
- the accuracy of our estimate of the burden for this collection of information;
- ways to enhance the quality, utility, and clarity of the information to be collected; and
- ways to minimize the burden of the collection of information on respondents.

We received feedback from four (4) of the nine (9) individuals contacted. Our initial and follow-up requests for feedback were made by email. A third contact was made by telephone to the remaining individuals that had not provided feedback. We left voice messages and did not receive a response.

Respondent Title	Organization	Forms Reviewed
Individual	No organization affiliation	10-930, 10-930s
President	Youth With A Mission	10-930, 10-930s, 10-930c, 10-931
Owner	Spoke and Paddle	10-930, 10-930s, 10-933
Club President	Val Verde Bass Club	10-930, 10,930s, 10-933

1. Did the forms ask any questions you feel are unnecessary?

Comment #1 - Form 10-930: Considering the desire to allow ones Park experience to be delightful, I'm surprised the whole process isn't more lengthy! We live in a crazy world and people often times display how crazy they can be.

Comment #2 Form 10-930 and 10-933: Several of the questions only applied to big tournaments with several dozen boats. Maybe provide a separate form for tournaments with 40 boats or less.

NPS Response: The NPS uses form 10-930s, which gathers less information. It is up to the superintendent's discretion as to which application is used by the park. When the park is unfamiliar with the applicant, parks tend to use the standard 10-930 application in order to prompt applicant to submit sufficient information to reach a decision on the request. This saves the park time in returning to the applicant for additional information.

2. How long do you estimate it will take you to fill out the form?

Comment #1 - Form 10-930s: About 15 minutes

Comment #2 – Form 10-930 and 10-930c: Thinking back through 2013-2017, when we were submitting an application for only a few specific camping trips or day hikes, the form only took us about an hour. Currently for our upcoming 2019/2020 SUP application, it will take us about 4 hours to gather all the details from all the different user groups in our organization and to outline descriptions of the activities (location, dates, number of participants, on-site contacts) through multiple operating seasons.

Comment #3 – 10-930 and 10-931: It probably took me about 20 minutes to fill out the form by the time I read all the sections.

NPS Response: *Comment #2 is actually submitting a single application for multiple activities. Since the requested permit is far more complex, and needs to address multiple dates and times, and various activities is it reasonable that the application would take more time to fill out.*

3. Do you have suggestions on how the form or the overall application process could be improved?

Comment #1 – Form 10-930: While I recognize that each applicant may have different needs, for our circumstances it is always “interesting” when filling out the usage portion. Perhaps an area requesting what you are trying to accomplish.

Comment# 2 – Form 10-930: Adding some form of these questions may help groups like ours in the application process:

- Is this an application for a one-time event or for a period of time (i.e. An operating season)?
- One thing we provided in the application from the beginning (back in 2013 when we introduced ourselves to Mark) was a description of our organization and of our specific user groups. This stemmed from us doing this on our USFS permit applications. While we’re not sure if it was particularly useful on the GNP/NPS end, we appreciated the opportunity to share about who we are, what we do and our level of competency in the outdoors. This also comes to mind now because in the past month we’ve spoken to a few other national parks about their SUP process and the first question they ask is “what kind of organization (or group) are you”?

Comment #3 – Form 10-930: I think that if you could provide applicants with the 14 NPS standard regulations and then the additional GNP specific regulations for camping/hiking before they start an application, it would help applicants to understand what is expected of

them earlier on in the process so they can plan accordingly and ask clarifying questions during the formal application process.

NPS Response: *Given the wide range of activities covered by the applications, it would be difficult to add specific information to the approved template. NPS management guidance encourages parks to post park specific and activity specific information on their park's special park use permit page. The NPS will continue to stress the importance of including all necessary information on the web page. In addition, the application receives a draft copy of the permit, including the 14 standard conditions, to review and sign before final approval by the park superintendent.*

4. Do you have suggestions on how to lessen the time it takes to fill out the application?

Comment #1 – 10-930 and 10-933: Maybe a short form for club tournaments or small tournaments with 40 boats or less.

NPS Response: *The NPS has a short form application for special park uses, Form 10-930s. Agency policy leaves it up to the discretion of the park superintendent to determine the form to use and the amount of information required to reach a decision.*

Comment #2 – 10-930: An on-line system may reduce some of the time it takes to complete the application. Overall the time it takes to complete the application seems reasonable.

NPS Response: *NPS guidance is for parks to post applications and permit information on the park's web site. Individual parks may make the determination to accept applications by email as an attached file. There are currently no plans to implement a service wide online application process since the information needed to process a permit is park and activity specific. The implementation of an on-line application process dependent upon funding availability for the initiative.*

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

We do not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Because the application process includes a financial transaction, under direction of the Treasury Department, the NPS collects social security numbers and/or tax identification numbers. The information is protected in accordance with the Privacy Act and OMB Circular A-108 and M-17-12. NPS is currently in the process of updating the Special Use Permits –Interior, NPS—1 to reflect the government-wide format established by the Office of Management and Budget (OMB) Circular A-108, *Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act*, that includes new sections on the security classification of the information, purpose(s) of the system, and history of the system of records.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask sensitive questions.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

We estimate that we will receive 80,483 responses totaling 22,872 annual burden hours. We estimate the dollar value of the burden hours is \$\$832,775 (rounded). We used the hourly

rates (including benefits) listed in Table 1 of the Bureau of Labor Statistics news release USDL-19-1649, September 17, 2019, Employer Costs for Employee Compensation—June 2019, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the total annual burden for this collection.

- Individuals. \$36.61
- Private Sector. \$34.44
- State and Local Government. \$50.78

Table 12.1. Total Estimated Annualized Burden

Activity	No. Of Annual Respondents	Completion Time Per Response (Minutes)	Total Annual Hours*	Hourly Rate Incl. Benefits	\$ Value Of Annual Burden Hours
Form 10-930					
Individuals	3,174	30	1,587	\$36.61	\$58,100
Private Sector	3,264	30	1,632	\$34.44	\$56,206
Government	382	30	191	\$50.78	\$9,699
Form 10-930s					
Individuals	7,446	15	1,862	\$36.61	\$68,168
Private Sector	6,640	15	1,660	\$34.44	\$57,170
Government	510	15	128	\$50.78	\$6,500
Form 10-930c					
Individuals	2,200	30	1,100	\$36.61	\$40,271
Private Sector	300	30	150	\$34.44	\$5,166
Government	10	30	5	\$50.78	\$254
Form 10-931					
Individuals	854	15	214	\$36.61	\$7,835
Private Sector	1,954	15	489	\$34.44	\$16,841
Government	90	15	23	\$50.78	\$1,168
Form 10-932					
Individuals	402	30	201	\$36.61	\$7,359
Private Sector	1,211	30	606	\$34.44	\$20,871
Government	51	30	26	\$50.78	\$1,320
Form 10-933					
Individuals	51,401	15	12,850	\$36.61	\$470,439
Private Sector	517	15	129	\$34.44	\$4,443
Government	77	15	19	\$50.78	\$965
Totals	80,483		22,872		\$832,775

* Rounded to match ROCIS

13. Provide an estimate of the total annual nonhour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We estimate the average fee per application is \$75, which is submitted with an application to cover the cost of processing the application (cost recovery for the NPS is authorized by 54 U.S.C. 103104). Therefore, we estimate that the annual non-hour cost burden associated with this information collection is \$6,036,225 (\$75.00 x 80,483). The increase is due to the significant increase in documented permits issued for off-road vehicle use.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

We estimate that the annual cost to the Federal Government to administer this information collection is \$8,076,469 (rounded) (80,483 applications x \$100.35).

Employees who work with this information collection are located at parks Nationwide, some in locality pay areas. Initial submission may be made to a lower graded employee, while consideration of and decisions based upon the information are often performed at a higher level. The amount of time necessary for the NPS to process a request for a special park use permit varies widely, from less than an hour for small routine events (such as a picnic) or a still photography permit to several hours for a request for an agricultural permit or a moderate sized commercial filming request. When environmental assessments (e.g., National Environmental Policy Act (NEPA) and National Historic Preservation Act) are required, the amount of time increases by many hours. However, the majority of Special Park Use Permit requests qualify for a categorical exclusions or programmatic environmental assessments under NEPA and require little or no additional compliance. Therefore we have averaged the estimated the time it would take for each employee to perform the task.

To determine average hourly rates, we used Office of Personnel Management Salary Table 2019-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/RUS_h.pdf) as an average nationwide rate. We used Bureau of Labor Statistics news release USDL-19-1002, June 18, 2019, Employer Costs for Employee Compensation—March 2019, (<http://www.bls.gov/news.release/pdf/ecec.pdf>) to calculate the most current benefits rates for government employees and multiplied it by the hourly rate to obtain a fully burdened rate. We estimate it will take staff an average of 2 hours to process each application.

Table 14.1 Total annual cost to the Federal Government

Position	Grade/Step	Hourly pay rate	Hourly rate including benefits (1.6 x hourly rate)	Time spent on each application (minutes)	Weighted average
Clerical	GS 5/5	\$18.44	\$29.50	10	\$4.91
Park Ranger	GS 9/5	\$27.93	\$44.68	80	\$59.57
Supv. Park Ranger	GS 11/5	\$33.80	\$54.08	20	\$18.02
Park Superintendent	GS 15/5	\$66.96	\$107.14	10	\$17.85
Cost per application					0

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

We are estimating 80,483 responses totaling 22,872 annual burden hours, which is a net increase of 46,748 responses and a net increase of 10,956 burden hours from our previous submission. This includes the addition of the new form 10-930c (Table 15.1 and 15.2). The remaining increases in both responses and burden hours are the result of improved tracking of permits, particularly those issued for off-road vehicle use. The creation of an application specific to vehicle use led to a significant improvement in tracking burden hours associated with this use. Overall, we

experienced an increase in the number of submissions using Forms 10-931, 10-932, and 10-933; and a significant decrease in the use of the 10-930 and 10-930s (see table 15.2).

The net increase of 46,748 responses resulted in the corresponding increase in the non-hour annual burden costs of 3,506,100 ($\$75.00 \times 46,748$).

Table 15.1. Program Change

Activity	Previously Approved		Current Request		Net change	
	Responses	Burden (hours)	Responses	Burden (Hours)	Responses	Burden (Hours)
Form 10-930	12,838	6,420	6,820	3,410	-6,018	-3,010
Form 10-930s	4,861	1,216	14,596	3,650	+9,735	+2,434
Form 10-930c	0	0	2,510	1,255	+2,510	+1,255
Form 10-931	1,680	421	2,898	726	+1,218	+305
Form 10-932	1,073	538	1,664	833	+591	+295
Form 10-933	13,283	3,321	51,995	12,998	+38,712	+9677
Total	0	0	0	0	+46,748	+10,956

15.2. Reasons for Change

Activity	Net change		Reason for Change		
	Response	Burden (Hours)			
			The NPS Special Use Program has made progress during the past three years to ensure that parks are using the appropriate forms.		
Form 10-930	-6,018	-3,010	Some parks began using 10-930s forms for their permitting needs, due to the limited amount of information required for park related activities.		
Form 10-930s	+9,735	+2,434	Parks increased the use of shorter version of the 10-930 limited amount of information required for park related activities		
Form 10-930c	+2,510	+1,255	This is a new form requested by parks issuing permits for recreational activities above 10,000 feet.		
Form 10-931	+1,218	+305	More applications were received due to increased visitation rates		
Form 10-932	+591	+295	More applications were received due to increased visitation rates		
Form 10-933	+38,712	+9677	Several parks with large off road vehicle programs started to use the form, resulting in a spike in burden hours.		
Total	+46,748	+10,956			

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

NPS may use data from the various applications to measure resource impact as a function of use. It is important to document how often a specific location is used for a special park use (i.e., concerts or festivals, event length, equipment and number of participants) to gauge the impact on park resources caused by permitted activities. This data may also be used while creating management plans for park areas, such as setting visitor use limits. No large-scale publication of the data is anticipated and no information specific to individual users will be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display the OMB control number and expiration date on the forms.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.