

**SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT STATEMENT SUBMISSION**

**NATIONAL PARK SERVICE BACKCOUNTRY/WILDERNESS USE PERMITS
36 CFR 1.5, 1.6, and 2.10**

OMB CONTROL NUMBER 1024-0022

Terms of Clearance: None.

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

The Backcountry/Wilderness Use Permit Application, Form 10-404, and the Backcountry/Wilderness Use Permit Hangtag, Form 10-404A, are used to implement the NPS Backcountry/Wilderness Permit reservation and issuance process to provide access into backcountry and wilderness areas where registration is required or limits are imposed in accordance with regulations. The backcountry/wilderness permit permitting process enhances the ability of the National Park Service (NPS) to issue hazard warnings, closure notification, conduct search and rescue efforts, promote Leave No Trace outdoor ethics, and provide mission-based visitor and resource protection.

In response to a public comment on the 60-day Federal Register Notice, we are now seeking approval for a new form, *the Alaska Backcountry/Wilderness Use Permit Application* to be used in Alaskan park units. Due to unique, park specific requirements regarding backcountry and wilderness use within Alaskan park units, a new form was created to better serve Denali National Park and Preserve and Glacier Bay National Park and Preserve. This form does not request any new information currently approved in Form 10-404. The new form serves to clarify the legal authorities governing permitted activities only allowable within Alaskan park units, removes permit application fees which are not collected in these parks, and includes additional permitted methods of travel as regulated by ANILCA Section 1110(a).

Legal Authorities:

- NPS Organic Act (54 U.S.C. §100101)
- Wilderness Act (16 U.S.C. 1131-1136)
- Federal Lands Recreation Enhancement Act (43 U.S.C. §1701 et seq),.
- Alaska National Interest Lands Conservation Act (16 U.S.C.3101).

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.

The permit application, form 10-404, is used to collect information from a person who is applying for backcountry/wilderness trip or activity that requires a permit. Form 10-404A, the permit hangtag, is supplemental to and contains the same information collected on the application. The hangtag is issued to the applicant when their permit is approved to serve as a reminder of their itinerary and verification that their trip was properly permitted in the event they are checked by field personnel for compliance purposes.

Because of the range of activities and the different management needs and resources at each park, applicants may not be required to answer all questions referenced in forms 10-404 or 10-404A. Depending on the requested activity, park staff will have the discretion to ask for less information than appears on the proposed forms. However, park staff may not ask for additional or different information.

Each permittee must file an itinerary showing proposed points of access, travel routes and locations/campsites of overnight stays. The itinerary information is collected in form 10-404 and form 10-404A and is not collected through a separate process. In the event of an overdue hiker or the existence of emergency situations such as wildfires or other incidents that pose a risk to public safety, the NPS will use the information to respond to search and rescue and/or emergency medical incidents that pose a threat to the health and safety of park visitors, including actions taken to evacuate or provide emergency assistance to visitors who have become injured or lost or exposed to hazardous conditions.

The backcountry/wilderness permit collects information on the amount, location, timing and type of backcountry/wilderness use. The amount of use is measured by the number of people and/or camper/user nights. The location is indicated by the entry and exit trailheads and travel route(s) or zone(s). The day of the week and season are shown by the date of entry and exit. The type of use (hiking, boating, stock use) identifies the method of travel. This information monitors use levels and is necessary in order to identify any impacts to the resources or visitor experiences. The collection of this information provides critical information to backcountry/wilderness managers, which can be used to accomplish mission-based visitor and resource protection and to assure visitor enjoyment and safety.

Forms are available at backcountry/wilderness permit reservation offices in the parks. Respondents complete the form as they reach the trailhead or backcountry/wilderness permit office and before beginning their backcountry hike. A copy is retained by the respondent, and a copy is retained by the park.

In response to a public comment on the 60-day Federal Register Notice, we are seeking clearance for a new form (NPS Form 10-404AK), the Alaska Backcountry/Wilderness Use Permit Application to be used in Alaskan park units. The commenter pointed out the permitting system was only applicable to Alaskan parks that have regulatory requirements for backcountry wilderness permits. Additionally, the commenter identified exemptions to activities that are restricted in designated wilderness areas within the contiguous United States, such as snowmobiling. Specifically, exceptions apply where enabling legislation, such as Alaska National Interest Lands Conservation Act (ANILCA), allow for motorized and mechanized access in designated wilderness within Alaska. Due to unique, park specific requirements regarding Backcountry/Wilderness Use applications within Alaskan park units, a new form was created to better serve form users within Denali National Park and Preserve and Glacier Bay National Park and Preserve. The new form does not request any new information or incur any new burden not already cleared by OMB for collection on the 10-404. It was created to clarify the legal authorities governing permitted activities specific within Alaskan park units, removes permit application fees which are not collected in these parks, and includes additional permitted methods of travel as regulated by ANILCA Section 1110(a).

With this renewal, we are also making the following updates to Form 10-404:

Section	Page	Change	Reason
APPLICANT INFORMATION	1	Added reference to "Province."	We have visitors from Canadian Provinces.
	1	Changed "Zip Code" to "Postal Code."	Reworded for clarity.
MISCELLANEOUS INFORMATION	1	Added "Do you have a service dog?"	This would give the park an opportunity to provide additional information regarding use of service dogs in the park.

	1	Added question "Have you previously completed or received a mandatory permit orientation or briefing" and "if yes, when?"	This may allow frequent users to be excused from repetitive orientations.
TYPE OF BACKCOUNTRY USE REQUESTED	1-2	Added check boxes for the following types of use: "Draft Boat Floating, Packrafting, Sea Kayaking, Sailboats, Dog Mushing, Hunting, & Fishing."	These additional uses are growing in popularity and may be applicable in the permitting process.
PERMIT FEE PAYMENT INFORMATION	4	Added "Fee discounts."	Passes issued by the NPS can decrease or waive the permitting fee as applicable in certain parks.

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.

The information is generally collected in-person at trail heads or backcountry/wilderness permit offices in advance of the backcountry/wilderness use. Although, stand-alone NPS automated backcountry/wilderness reservation systems may be available at selected parks, the NPS is working with Recreation.gov to provide a single automated system for the application process. We anticipate that an automated application processed will be available on Recreation.gov by the end of fiscal year 2020. Applications will continue to be accepted in person and on a walk-in basis at parks.

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

The requested information is unique to each permit applicant, and no other source is available. We do not collect similar information pertaining to backcountry/wilderness use in another existing collection.

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

This collection does not impose an undue burden on small businesses.

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 information is collected on a one-time use basis from visitors planning backcountry use. The information allows the NPS to monitor use and contact backcountry user in the case of emergencies, advisory or to provide safety and educational material. Without this information the NPS would be unable to account for visitors in the backcountry in the case of emergencies, advisory or to provide safety and educational material.

- 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 special circumstances that would cause 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 March 18, 2020 the National Park Service published in the *Federal Register* (85 FR 15494) 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 May 18, 2020. One comment was received from the State of Alaska in response to that notice. The following comment is from the Alaska National Interest Lands Conservation Act (ANILCA) program coordinator:

State of Alaska Comment

“Should OMB continue to authorize NPS Form 10-404 for use in Alaska park units, to improve clarity and eliminate misinformation and confusion for a significant number of park visitors and Alaskan residents, the form needs to be revised to clarify:

- 1) it only applies to Alaska park units that have regulatory requirements for backcountry wilderness permits;
- 2) not all park units require an entrance fee; and
- 3) exceptions apply where enabling legislation, such as ANILCA, allows for motorized and mechanized access in designated wilderness.”

NPS Response/Action Taken:

The National Park Service accepts the suggested revisions and has created a (new) separate Backcountry/Wilderness Use Permit Application specific to National Park Service units in Alaska.

In addition to the Federal Register Notice, we contacted the nine (9) individuals familiar with this collection to solicit feedback on NPS Forms 10-404 and 10-404A. Those contacted were private citizens who applied for backcountry permits at parks across the nation. Of those 9 individuals, the four (4) provided feedback. Specifically, we asked for comments on the following:

“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”

Comments Received:

- “In each case, I felt that the information requested was entirely reasonable for the safety of the trip participants and the management of park resources.”
- In my experience the parks I frequent have customized permits. As I usually use these permits alone, I always feel comfortable knowing that the parks system knows roughly where I’m at, where I’m headed and when I should return!”
- “The information requested when applying for a NPS backcountry/wilderness permit makes complete sense. The information is important for protecting our natural resources as well as protecting the quality backcountry or wilderness experience my wife and I seek. It also helps keeps us, and park staff safe. The information helps managers make sound decisions on resource protection, track trends, and ensures compliance with existing regulations. All questions are necessary in my opinion as there are many scenarios and situations that may be occurring or present and the questions are comprehensive enough to address the possible situations.”
- “The only piece I feel is not necessary (both on my own application last year and this draft) is the section on gear being used. It feels tedious, intrusive, and serves no practical purpose. I understand the intent but to my knowledge, there is no enforcement or requirement of equipment. The one piece I would leave in is about the cellular/satellite phones and emergency locators. It would be good for the NPS to have should a person go missing.”

NPS Response/Action Taken:

- Comment # 1, 2 and 3: No action required.
- Comment # 4: Parks use the equipment list to help inform search and rescue and/or emergency medical incident responses. Information regarding communication or emergency signaling devices is also collected in some parks as an added measure of visitor safety.

“The accuracy of our estimate of the burden for this collection of information”

Comments Received:

- “8 minutes sounds about right - I don't remember the processes enough to have any more specific time burden estimates.”
- “I would say the paperwork I usually fill out is about 1/2 of what was suggested in the attachment and takes me usually less than 5 minutes.”
- I would agree with your estimate on the amount of time (~8 minutes) required to complete the application. I don't consider this a "burden", rather a prudent expenditure of time preparing for wilderness experiences.”
- “Last year's application was my first. I am quite sure it took me over 8 minutes as I really wanted to be approved and not make mistakes. There were also additional forms requested of me to fill out after initial application due to "extreme hiking conditions". So, substantially more than the estimate you noted.”

NPS Response/Action Taken:

- Comment # 1, 2 and 3: No action required.
- Comment # 4: The addition form related to extreme hiking conditions is applicable at Grand Canyon National Park due to their extensive history of heat and terrain related search and rescue and emergency medical incidents. This supplemental form is critical to the park's on-going public safety and preventative search and rescue efforts. No action warranted.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments Received:

- “I have no ideas on improvements.”
- “I haven't encountered any problems when applying, so I'd say that the quality and clarity is fine.”
- “I would delete all the equipment requests except as noted in my response to question one. I would then move that phone/locator section to under the emergency contact information in the "miscellaneous information" section.”
- “Sometimes when I'm doing multi trailhead trips I'm unsure of how I need to do it, so some clarity there might be nice.” “I see no need to reduce the time or thoughtfulness

required during the permitting process. This process is properly managed, prudent, and keeps us safe.”

NPS Response/Action Taken:

- Comment # 1 and 2: No action required.
- Comment # 3: Several parks utilize parts of the equipment list as a means of ensuring that visitors are properly equipped and prepared to accept the inherent risks and safety considerations associated with their trip. The equipment information is viewed by parks as important information that may be used to help inform search and rescue and/or emergency medical incident responses. Information regarding communication or emergency signaling devices is also collected in some parks as an added measure of visitor safety.
- Comment # 4: All NPS units are encouraged to provide detailed trip and permit planning advice and instructions through online and printed media as well as in-person service.

“Ways to minimize the burden of the collection of information on respondents”

Comments Received:

- “The burden on respondents seems to be as minimal as possible while maintaining full utility of the documents.
- “I feel the suggestions I listed above would streamline the process and minimize the burden on applicants. No other suggestions.”
- “I think the current system is very streamlined and I can’t think of anything to make it easier. At ROMO and BIBE the permit I carry on my pack is printed at the backcountry office, but I can imagine if I had to fill that out it would be tedious.”
- “I see no need to reduce the time or thoughtfulness required during the permitting process. This process is properly managed, prudent, and keeps us safe.”

NPS Response/Action Taken: No action required.

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

We do not make any 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. The information collected is subject to the requirements of the Privacy Act and the Freedom of Information Act. The NPS Privacy Act Officer has determined this collection requires a Privacy Act System of Records Systems of Records Notification (SORN). NPS SORN "Servicewide Backcountry/Wilderness Use Permit System – NPS-26" is currently in development. The NPS did not want to delay the submission of this renewal request and will provide OMB with the publication date and FR reference for the document via ROCIS as soon as it is published in the Federal Register.

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 questions of a sensitive nature.

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 there will be approximately 351,121 annual responses totaling 39,116 annual burden hours. This represents a 10% increase in NPS backcountry/wilderness permit applications since 2017. We estimate the total dollar value of the annual burden hours for this collection to be **\$1,451,340** (rounded). We used the rates listed below in accordance with Bureau of Labor Statistics news release [USDL-20-0451](#), March 19, 2020, Employer Costs for Employee Compensation—December 2019, to calculate the total annual burden. Table 1 lists the hourly rate (Including benefits) for all workers in the following categories as:

- Individuals: \$37.10
- Private Sector: \$34.72
- State/Local/Tribal Government: \$52.14

TABLE 12. 1. Total Estimated Annualized Burden

Activity	Total Annual Responses	Completion Time per Response (minutes)	Total Annual Burden Hours*	Hourly Rate (incl. 1.6 for benefits)	\$ Value of Annual Burden Hours*
NPS Form 10-404, Backcountry/Wilderness Use Application					
Individuals	188,319	8	25,109	\$ 37.10	\$ 931,543
Private Sector	5,855	8	781	34.72	27,116
State/Local/Tribal Government	976	8	130	52.14	6,778
Subtotal	0		0		965,437
(NEW) NPS Form 10-404AK Alaska Backcountry/Wilderness Use Application					
Individuals	1,902	8	254	\$ 37.10	\$ 9,423
Private Sector	59	8	8	34.72	278
State/Local/Tribal Government	10	8	1	52.14	52
Subtotal	0		0		9,753
NPS Form 10-404A, Backcountry/Wilderness Use Permit Hangtag					
Individuals	148,610	5	12,384	\$ 37.10	459,446
Private Sector	4,620	5	385	34.72	13,367
State/Local/Tribal Government	770	5	64	52.14	3,337
Subtotal	0		0		476,150
TOTAL	351,121		39,116		1,451,340

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers 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.

There is no annual non-hour cost burden associated with this information collection.

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.

Time necessary to process applications and supporting documents varies based on complexity and is accounted for in the average minutes/permit numbers in the table below. The total estimated cost to the Federal government for processing applications is \$1,162,211 (351,121 applications x \$ 3.31 rounded). All information collection is done by individual parks that provide backcountry permits with either Park Rangers or Visitor Use Assistants (average grade of GS-05) usually collecting the information.

To determine average hourly rates for the Federal positions identified below, we used Office of Personnel Management Salary Table [2020-RUS](#). We used the below listed rates in accordance with Bureau of Labor Statistics news release [USDL-20-1232](#), June 18,2020 Employer Costs for Employee Compensation—March 2020, we multiplied the hourly rates by 1.6 to account for benefits.

Table 14.1 Annualized costs to the Federal Government

Position	Grade/Step	2020-RUS Hourly Pay Rate	Hourly Rate Including Benefits (1.6 x hourly rate)	Time Spent on Each Permit (minutes)	Weighted Average
Park Ranger	GS-05/05	\$ 18.96	\$ 30.34	5	\$2.53
Supervisory Support	GS-09/05	28.73	46.83	1	\$0.78
TOTAL					0

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

We are reporting a net increase of 31,921 responses and 3,557 burden hours. This is attributed to a 10% increase in the estimated number of annual applications for backcountry/wilderness since our previous submission in 2017.

We are seeking clearance for a new form. In response to the public comment received from the State of Alaska we create a form specifically for backcountry permits in Alaska. This programmatic change does not impact the hourly or cost burden incurred by this information

collection. We've assumed that 10% (n=1,971) of the total number of applicants (n=197,121) using Form 10-404 will use the new Form 10-404AK. This assumption is based on our current calculation of the number of backcountry use permits granted in Alaska in the past three years.

Table 15.1 Program Changes

Activity	Anticipated Completed Responses			Anticipated Respondent Burden (hours)		
	Current Request	Previous	Net Change	Current	Previous	Net Change
NPS Form 10-404, Backcountry/Wilderness Use Application	195,150	179,200	15,950	0	23,893	2,127
NEW) NPS Form 10-404AK Alaska Backcountry/Wilderness Use Application	1,971	0	1,971	0	0	263
NPS Form 10-404A, Backcountry/Wilderness Use Permit Hangtag	154,000	140,000	14,000	0	11,666	1,167
TOTAL	0	319,200	0	39,116	0	0

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.

We will not publish this information.

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 Form 10-404. However, we are requesting approval to not display the expiration date the Permit Hangtag (10-404A). Hangtags are printed in bulk by the Government Printing Office and are typically available for use well after the three-year ICR assigned expiration. Hangtags that appear to be invalid because of a pre-printed expiration date has caused public confusion related to the validity of the form. Removing the expiration date will also allow continued use of the forms during the OIRA review period of when the expiration date is automatically renewed monthly.

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.