

2022 Supporting Statement A for OMB 0596-0106
Wilderness Program Administration

Justification

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

2.

Every year millions of people visit America's national forests and grasslands to enjoy the recreational opportunities they provide or experience the solitude and challenge offered by congressionally designated Wilderness and other special management areas. At some locations visited, the public is required to obtain a permit for use or register at a trailhead. These permits and registration forms help the Forest Service meet policy direction, provide for public uses of the land in a responsible manner, as well as monitor use.

The Visitor's Permit (FS-2300-30) and Visitor Registration Card (FS-2300-32) are used to collect information about visitation rates. The information collected by them assists Forest Service personnel in improving facilities and services, managing recreation areas and activities, preventing resource damage, preserving high quality outdoor experiences, and providing visitor safety. These forms have and will continue to help the Agency meet resource objectives and visitor needs.

Statutes and Regulations:

- Federal Lands Recreation Enhancement Act (16 U.S.C. 6801-6814);
- Organic Administration Act (USC 16, 551),
- Wilderness Act (Public Law 88-557, Section 4),
- Wild and Scenic Rivers Act (Public Law 90-542, Section 10)
- Executive Order 11644,
- 36 CFR, Section 261.57 (Subpart A);
- 36 CFR, Section 261.58 (Subpart E); and
- 36 CFR 293.3 (Subpart A).

The Visitor's Permit (FS-2300-30) and Visitor Registration (FS-2300-32) forms collect information about visitor use and help the Forest Service meet policy directives as well as provide for public uses of the land in a responsible manner. Information gathered on the forms identifies areas most frequently visited, provides the agency with critical information for appropriate stewardship of lands, and provides critical information to search and rescue personnel when locating lost visitors.

3. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

a. What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

FS-2300-30 – *Visitor's Permit*: Information collected includes the visitor's name and

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address, area(s) to be visited, dates of visit, length of stay, location of entry and exit points, method of travel, number of people in the group, and where applicable, number of pack and saddle stock (i.e., the number of animals either carrying people or their gear), number of dogs, and number of watercraft or vehicles (where allowed). The Forest Service employee who completes the Visitor's Permit will note on the permit any special restrictions or important information the visitor should know. The visitor receives a copy of the permit and instructions to keep the permit with them for the duration of the visit.

FS-2300-32 – Visitor's Registration Card: Information collected includes the visitor's name and address, area(s) to be visited, dates of visit, length of stay, location of entry and exit points, method of travel, number of people in the group, and where applicable, number of pack and saddle stock (i.e., the number of animals either carrying people or their gear) in the group, or number of watercraft or vehicles, number of dogs, and number of watercraft or vehicles (where allowed).

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 information on FS-2300-30 and FS-2300-32 is collected from visitors (members of the public) to congressionally designated Wilderness and other special management areas that have implemented the Visitor's Permit or Visitor Registration card to manage and/or monitor use levels and patterns.

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

FS-2300-30: The information gathered using this form assists in the management of special areas on National Forest System lands by helping identify Wilderness and special management areas most frequently visited, providing the agency with critical information for appropriate stewardship of these lands, and assisting personnel when locating lost visitors. The Visitor's Permit is required for entry into some special management areas on National Forest System lands. Reservations and permit systems control public use in some Wilderness areas, Wild and Scenic Rivers, restricted off-road vehicle areas, and campgrounds. In areas where public use is managed and/or monitored, the Forest Service uses the Visitor's Permit to: prevent resource damage, preserve the quality of the experience, or for public safety. For example, visitor permits help the Agency understand how many people may be using a particular trailhead or portion of a Wilderness area. The Agency uses this information to respond to indicators or standards in a management plan.

The personal contact that is involved with issuance of a Visitor's Permit provides an excellent opportunity for the Forest Service to discuss resource protection, proper camping techniques, fire prevention, safety, and sanitation requirements with the visitor. The permit allows managers to identify heavily used areas and move use to lesser-impacted areas. The permit also provides managers with information useful in locating forest visitors if they do not return from their trip as planned (i.e. aid in search and rescue missions).

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FS-2300-32: This voluntary registration card provides Forest Service managers an inexpensive means of gathering visitor use information without imposing mandatory visitor permit regulations. Similar to the Visitor's Permit mentioned above, Visitor Registration Cards help the Forest Service understand how many people may be using a particular trailhead or portion of a Wilderness area. This information allows the Agency to respond to indicators or standards in a management plan by identifying areas that are being heavily used without requiring a mandatory permit system to gather and record this data. Managers can then prepare restoration and monitoring plans to reflect where use is occurring, and, in extreme cases, develop plans to move use to lesser impacted areas. The Visitor Registration Card also provides managers with information useful in locating forest visitors if they do not return from their trip as planned.

- 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?**

FS-2300-30: Information will be collected by Forest Service employees who complete the form at a Forest Service office. Visitors may obtain the permit in person or may call ahead and provide the required information. In some instances, the permit is completed at an un-staffed trailhead and then deposited into a collection container.

FS-2300-32: Information will be collected on the form that is manually completed by visitors without Forest Service assistance at the entry location. The card is deposited in an appropriate collection container.

- e. How frequently will the information be collected?**

FS-2300-30: Each time an individual visits a Wilderness or special management area that has a permit or registration system in place.

FS-2300-32: Each time an individual visits a Wilderness or special management area that has a permit or registration system in place.

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

The Forest Service does not share the information collected with other organizations inside or outside the government.

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

Collection requirements for FS-2300-30 and FS-2300-32 have remained stable since the forms were initially approved and have experienced only minor modifications.

- 4. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other techno-**

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logical 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.

The standardized forms provide the most efficient means of obtaining the data in a readily usable format and place the least burden on both visitor and Forest Service.

Information on FS-2300-30 and FS-2300-32 is collected at a Forest Service office or at the entry point of a special management area. It does not involve the use of automated, electronic, mechanical or other technological collection techniques or other forms of information technology as one of the primary reasons for use of these forms is to gain information on use levels and patterns; therefore, it is critical that visitors complete the form just prior to entry into the special management area. While it may be possible to collect this information electronically in advance of a visit, the quality of the information gathered would suffer considerably.

5. 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 information collected is unique to the Forest Service and the individual interested in accessing a special management area with a permit or registration system in place or participating in a specific activity on National Forest System lands. There is no similar information that is already available to be used or modified for use for the purposes described in Item 2.

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

This collection of information will not impact small businesses or other small entities. Visitors to National Forest System lands provide the information collected.

7. 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.

If this collection is not authorized, the Forest Service will not be able to:

- a. Manage the recreation application and permit process for facilities and activities outside Recreation.gov;
- b. Successfully manage recreation and Wilderness programs;
- c. Monitor visitation rates in special management areas to prevent overuse and site deterioration in environmentally sensitive areas; and
- d. Continue to provide high quality recreational experiences based on relevant visitor data.

8. Explain any special circumstances that would cause an information

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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;**

Due to the nature of the permits, respondents routinely apply for them fewer than 30 days ahead of the time of issuance and use.

- **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 secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6

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

The Forest Service solicited comments on information collection 0596-0106 in a Federal Register notice 87 FR 25216 published on April 28, 2022. The 60-day comment period for

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the notice closed on June 27, 2022. The agency received one comment on the applicability of both forms in Alaska.

- The commenter stated that the permit form FS-2300-30 does not apply in Alaska because the FS has not promulgated Alaska specific regulations to close areas (as required by ANILCA) and completing the permit would be an undue burden to residents using the area for traditional activities, which is protected by ANILCA.
- The commentator is not opposed to the registration form, FS-2300-32, but does state that special rules do apply in Alaska for that form as well, and a statement about those special rules should be included on the front of the form.
- The commentator would prefer that “not applicable in Alaska” be added to the front of the permit and that “Alaska includes special use and access allowances...” to the front of the registration card.

According to the Office of General Council:

- ANILCA does not require that there be Alaska specific regulations for the Forest Service to regulate activity on National Forest System lands in Alaska. Further, it is explicit that the use of motor vehicles on both public lands and CSUs is subject to “reasonable regulation.” *E.g.*, ANILCA §§ 811 and 1110(a). We assess that, in appropriate circumstances, use of the relevant forms would likely constitute a reasonable regulation.
- As to the comment about burden, imposing a permit requirement would not be an unreasonable burden in most circumstances and the comment letter does not explain why requiring a permit for traditional activities is per se unreasonable.

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.

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.

The Forest Service consulted the following individuals regarding this information collection:
Larry Ridenhour, Bureau of Land Management, 202-912-7255.

Feels that the forms are necessary for the practice of collecting information from individuals using US lands and resources.

Jonathan Cook-Fisher, USDA, Forest Service, 530-543-2741.

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Tim Rahmig, USDA, Forest Service, 619-445-6235.

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

The Forest Service does not provide a payment or gift to respondents.

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

No assurance of confidentiality is provided to visitors completing any of the forms.

For forms FS-2300-30 and FS-2300-32, no information covered by a Privacy Act System of Records, Personally Identifiable Information, or other confidential information covered by a statute, regulation, or agency policy will be collected.

For forms FS-2300-30 and FS-2300-32, personal information such as names, addresses, phone numbers, emails and vehicle registration information will be secured and maintained in accordance with the system of records, National Recreation Reservation System (NRRS) USDA/FS-55.

Records will be retained and disposed of in accordance with the appropriate General Records Schedules of the National Archives and Records Administration.

12. 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.

This kind of information is not requested or needed, nor provided to the Agency by individuals using recreation fee sites.

13. 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,**

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- e) Total annual responses (columns c x d)**
- f) Estimated hours per response**
- g) Total annual burden hours (columns e x f)**

Table 2

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Responde nts	(d) Number of response s annually per Respond ent	(e) Total annual respons es (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Visitor's Permit	FS-2300-30	347,000	1	347,000	.05 (3 minutes)	17,350 hours
Visitor Registration Card	FS-2300-32	205,000	1	205,000	.05 (3 minutes)	10,250 hours
Totals	---	552,000	---	552,000	---	27,600 hours

FS-2300-30 and FS-2300-32: The Forest Service does not centrally produce, collect or analyze the Visitors Permit and Visitor Registration Card, leaving that task up to the individual national forests that decide to use the forms, so actual use numbers are not available and must be estimated. For FS-2300-30, there are Wilderness areas, or portions of Wilderness areas, that have either quota-based permit or mandatory, non-limiting permits. These Wildernesses are estimated to average 5,500 visitors each annually. This results in an estimate of 347,000 respondents annually. For FS-2300-32, there are Wilderness areas that have voluntary self-registration systems. These Wildernesses are estimated to average 3,000 visitors each annually. This results in an estimate of 205,000 respondents annually.

- **Record keeping burden should be addressed separately and should include columns for:**
 - a) Description of record keeping activity:** None
 - b) Number of record keepers:** None
 - c) Annual hours per record keeper:** None
 - d) Total annual record keeping hours (columns b x c):** Zero
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

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Table 3

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c)* Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Visitor's Permit (FS-2300-30)	17,350	\$36.41	\$631,713.50
Visitor Registration Card (FS-2300-32)	10,250	\$36.41	\$373,202.50
Totals	27,600	---	\$1,004,916.00

*The median hourly wage of \$28.01 for all occupations from the most recent (May 2021) Bureau of Labor Statistics (BLS) was used (http://www.bls.gov/oes/current/oes_nat.htm#00-0000) with a 30% fringe benefit factored in based on the most recent BLS Employer Costs for Employee Compensation (<https://www.bls.gov/news.release/ecec.nr0.htm>). Recreation fee sites and special management areas are visited by individuals from geographical areas across the country. The national mean average is the best value to use with the above table.

- 14. 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.**

There are no capital operation and maintenance costs.

- 15. 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:**

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- **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**

Table 4

Item	Contract or cost for printing forms	Employee labor and materials for developing, printing, distributing, and storing forms	Employee labor and materials for collecting the information	Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information	Totals
Visitor's Permit, FS-2300-30	0	\$17,350 (347,000 forms @ \$0.05 per form)	\$127,869.50 (1 min/form X GS-5 wages X 347,000 forms)	\$158,463.46 (1 min/form x GS-7 wages x 347,000 forms)	\$303,682.96
Visitor Registration Card, FS-2300-32	0	\$6,150 (205,000 forms @ \$0.03 per form)	\$75,542.50 (1 min/form x GS-5 wages x 205,000 forms)	\$93,616.67 (1 min/form x GS-7 wages x 205,000 forms)	\$175,309.17
Total	0	\$23,500	\$203,412	\$252,080.13	\$478,992.13

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/GS_h.pdf

GS-5/5 \$16.88 x .31 (cost to govt) = \$22.11/hour

GS-7/5 \$20.91 x .31(cost to govt) = \$27.40/hour

GS-9/5 \$25.58 x .31 (cost to govt) = \$33.51/hour

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

Decrease in the burden is due to the National Forms being removed from this collection they are collected under a different IC.

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

There are no plans to publish the results of this information collection for statistical use.

18. 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 Forest Service requested and was exempted from displaying the OMB expiration date on past Paperwork Reduction Act submissions. The primary reason for the request in those submissions was the additional expense of redistributing thousands of new forms when the information collection expires though the form remains valid for use. Additionally, individuals may confuse OMB's expiration date with the expiration date of the permit. Some respondents in the past have also confused Forest Service's date that indicates when a form was last revised.

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

There are no exceptions to the certification statement. The agency is able to certify compliance with all provisions under item 19 of OMB form 83-I.