SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION

Application for Designation as National Recreation Trail or National Water Trail

OMB Control Number 1024-0283

**Terms of Clearance:**  None

**Justification**

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

Section 4 of the National Trails System Act of 1968, as amended (16 U.S.C. 1243), authorizes the designation of national recreation trails (NRTs) by the Secretary of Agriculture on all lands managed or administered by the U.S. Department of Agriculture (USDA), and the Secretary of the Interior on all lands other than those managed or administered by the USDA, as components of the National Trails System. National recreation trails were intended by Congress to complement national scenic and historic trails by providing a national recognition designed to elevate and promote Federal, Tribal, State, local, and community trails for their local and regional significance.

The sub-category of "national water trails" (NWTs) was allowed through the National Trails System Act and clarified by Secretary's Order (SO) 3319 as a means to acknowledge the different management needs of land-based and water-based trails for access, recreation, visitor use and safety, as well as marketing and tourism purposes.

The NPS has been delegated the authority to administer the process of conducting the review of new NRT and NWT applications and recommending approved applications to the Secretary of the Interior. The USDA has their own internal process. Applications for consideration by the Secretary of the Interior are submitted annually through an online application system. The questions asked in the online application system, described in Section 2, allow applicants to thoroughly describe and highlight their trail, and provide the NPS with the information necessary to ensure NRT and NWT applications meet designation criteria and are exemplary trails suitable for designation by the Secretary of the Interior.

---

**Legal Authorities:**

- National Trails System Act (16 USC 1243)

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 NPS use Forms 10-1002: *Application for Designation – National Water Trails System* and 10-1003: *Application for Designation -- National Recreation Trail*, to collect information needed to evaluate applicants requesting trails to be designated as a NRT or NWT on any Federal, Tribal, State, or local lands other than those managed or administered by the U.S. Department of Agriculture.

Approval of an application is based on (1) the sufficiency of information provided on the application form and in supporting documentation, such as photographs, maps, and written landowner consents that accompany the form, and (2) successfully meeting NWT requirements and best management practices criteria.  Successful applications follow the same protocols mentioned above in the approval of the applications submitted for NRT designation.

Changes to the NRT and NWT applications have been proposed in order to better clarify trail attributes, provide more detailed public information, and align questions asked to establish a more unified application process.

Upon designation of a trail, information from the application process is used to create one or more informational web pages for the new trail on the NRT/ NWT website and summary web pages.  These online resources provide information to federal employees and the public about the designated trails.

**Justification:**  The following fields identify unique characteristics, evaluate in comparison with other trails, and describe the trail succinctly at the time of designation.  The fields are bolded and italicized with supplementary choices italicized below each field. These fields include:

**NEW QUESTIONS**
**The following questions are new to the NRT and NWT applications.**

| Section | Justification |
|---|---|
| **Basic Trail Information**<br>*Application Type* | Text to determine which type of trail applicants are applying for. |
| **Trail Details**<br>*Trail Part of a System*<br>*Trail System Name*<br>*Entire Trail Length*<br>*Universal Accessibility Information* | For questions 1 – 3: Text to identify if trail is part of larger trail system.<br><br>For question 4: Text to address any accessibility information. |

**(NEW SECTION ADDED TO FORM 10-1003)**

| Section | Justification |
|---|---|
| **Best Management Practices**<br>*Recreation Opportunities & Access* | Text to describe recreation and access opportunities for a variety of trail users. |
| *Education & Interpretation* | Text to describe opportunities to learn about the local environment and habitat, value of land and water resources, cultural heritage, and outdoor skills. |
| *Conservation & Stewardship* | Text to describe opportunities for organizations and communities to develop and implement strategies that enhance and restore the health of the local environment, waterways, and surrounding lands. |
| *Community Support* | Text to describe the community involvement and any letters of support from local organizations, local or State governments, Tribes, etc. |
| *Public Information* | Text to describe how the public is provided with easily available and understandable information about the trail. |
| *Trail Maintenance* | Text to describe any trail maintenance practices associated with the trail. |
| *Planning & Management* | Text to describe any current and future planning activities related to the trail. |

**REVISED QUESTION**

**The following questions have been revised and updated to provide clarity based on questions and comments received from users.**

| Section | Justification |
|---|---|
| **Trail Details**<br>*Cumulative Elevation Gain*<br>*Total Running Distance of Minimum Width*<br>*Total Running Distance of Maximum Grade*<br>*Maximum Cross-slope of Trail*<br>*Total Maximum Running Distance of Cross-slope* | Revised questions to provide clarity on existing elevation, width, grade, and cross slope trail details. |
| **Visiting and Fees**<br>*Trailhead Name*<br>*Trailhead Dates Open Year-Round*<br>*Trailhead Times of Operation Open Dusk to Dawn*<br>*Fee Information Website*<br>*Trailhead Amenities* | Revised information to provide clarity and better public information for visiting and fee information. |
| **Contact Information**<br>*Surname* | Revised information for designation letter contact information to reduce additional outreach to applicants. |
| **Owner consent and State Support**<br>*List of All Landowners* | Revised information to clarify affected landowners. |

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.**

Forms 10-1002: *Application for Designation -- National Water Trails* and 10-1003: *Application for Designation -- National Recreation Trails* are 100% fillable/fileable and can be submitted electronically into the NRT online database. The forms and supporting documents are stored in a secured database that eliminates the manual transfer of information from the application form to an electronic format.

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. The information requested is specific to each trail nomination and is not otherwise available to the DOI bureaus.

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

This collection does not affect small businesses or other small entities.

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.**

If this information were not collected, the NPS would be unable to evaluate the nominations for NWT and NRT, and the Secretary of the Interior would be unable to designate new trails.

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 January 12, 2022, we published in the Federal Register (87 FR 1779) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on March 14, 2022. We did not receive any public comments in response to the notice.

In addition to the Federal Register Notice, we contacted nine (9) individuals familiar with this collection by email and phone to request feedback on the forms and process we use to collect information. The follow table includes the titles and organizations of the individuals providing feedback to our request. The follow table includes the titles and organizations of the individuals providing feedback to our request.

| Position | Affiliation |
|---|---|
| 1. Executive Director | American Trails |
| 2. Staff | American Trails |
| 3. Board Member | Back Bay National Wildlife Refuge Society |
| 4. Board Member | Trinity Coalition |
| 5. Director | Cave Country Trails |
| 6. President | Friends of the Manhan Rail Trail |
| 7. Refuge Manager | Back Bay National Wildlife Refuge |
| 8. Executive Director | Musconetcong Watershed Association |
| 9. Senior Director | American Hiking Society |
| 10. Assistant Trails Program Manager | U.S. Forest Service |

**A.** ***"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."***

**Respondent #1**: *I feel like all of the questions have direct bearing on allowing experts to determine whether the trail that is being proposed as an addition to either of these designations meets the standards of the program.*

> **NPS Response/Action Taken**: Response acknowledged

**Respondent #2**: *I have no objection to any of the questions in this regard. I feel the questions are all necessary and practical.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #3**: *I found the information and data required to be reasonable for NPS to make its decision and for the promotion efforts of American Trails which they place on their website.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #4**: *The National Park Service and (ORGANIZATION) must determine the viability of a trial application remotely by reviewing answers to all the questions on the application. Therefore we (NAME) agree with the questions and the pictures sent in as part of the trail application are the right amount. This is not the time for brevity. (NAME) is counting on the Nations Park Service Web Site to post our Water Trail and pertinent information that may attract out-of-town visitors to experience our Water Trail.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #5**: *I can understand the collection of all of the information requested. However, there did seem to be some overlapping questions - at least in our case. Maybe we were unnecessarily redundant though in our efforts to be thorough.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #6**: *Answering the question "Directions to the Trail" is also a challenge for a six-mile trail with multiple trailheads. Perhaps asking for directions to each trailhead as well as parking availability would be more specific and more useful to the reader.*

> **NPS Response/Action Taken:** In the proposed revised application questions, we have removed this question and provided the opportunity to enter data for multiple trailhead locations.

**Respondent #7**: *The Public Information Section had a sub-question about "Please provide in detail how your trail and managing agency(ies) strive for and implement this best management practice." That seemed redundant with the Planning Section, overall, and specifically with this sub-question: "Please provide in detail how your trail and managing agency(ies) strive for and implement this best management practice." It also overlapped with "Trail Maintenance." Perhaps there should be a Public Information section, about external public communications about the trail, and a Trail Management section, that had sub-questions about management, planning, and maintenance.*

> **NPS Response/Action Taken:** Thank you for your input. We will work with our team to ensure the language about Public Information Best Management Practices is clear and concise and does not overlap with additional best management practices.

**Respondent #9**: *Most of the information requested in this application appears to have practical utility. This revised application requires much more information about many topics that were not mentioned in the most recent application process. Particularly Section 5: Best Management Practices requires a deep dive into the management of the area applying for designation. This information, while it may significantly increase the amount of time it takes to apply for NRT designation, does seem useful and it seems logical that this information would assist in determining the appropriateness of NRT designation. Other pieces of information do not seem to be entirely necessary. Specifically in Section 2, Question 17 asks about the width of tread, including the total running distance of minimum tread width. It is not clear why this information is important. Information about recreational uses and universal accessibility are included in other sections of the application.*

> **NPS Response/Action Taken:** Thank you for your response. We are aware the addition of Best Management Practices requires a deeper dive into a trail's management. The intention of this addition is to better understand the trail, its community impact, and sustainability (physically and organizationally) beyond what is described in the traditional trail details. Questions 16 – 19, will be used on the National Recreation Trail database where the public can find information about a trail. Information such as Elevation, Width, Grade, and Cross Slope will help the public determine if a trail(s) will be suitable for their physical experience. This compliments the Universal Accessibility Information, which hopes to capture more of the associated built environment around the trail such as facilities

**Respondent #10**: *All collection of information appears necessary and has practical utility.*

> **NPS Response/Action Taken:** Response Acknowledged

**B. "What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?"**

**Respondent #1**: *I would estimate that doing a thorough job on either of these applications might take 2 hours to complete.*

> **NPS Response/Action Taken**: Response acknowledged

**Respondent # 2**: *With the increased information required in this revised application I estimate it would take about a month and a half to complete these questions, pull together the requested supporting materials, and confirm specifications and other details. However, the time it takes an individual site to complete the application will vary greatly, depending on conditions at that particular location and the amount of time available to the individual(s) pulling together the application.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent # 3**: *Average Time to complete the each sections of the form*
> *Section 1: 30 minutes*
> *Section 2: 15 minutes*
> *Section 3: 5 minutes*
> *Section 4: 10 minutes*
> *Section 5: 2 hours*
> *Section 6: 1 hour*
> *Section 7: 15 minutes*
> *Section 8: 15 minutes*
> *Section 9: 15 minutes*

Total estimated time: 4.75 hours

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #4**: *Three to four hours.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #5**: *My best guess is that I spent at least 60 hours, most of that collecting the required data. (NAME) would have had hours, and (NAME) and (NAME) some time.*

> **NPS Response/Action Taken:** Response acknowledged

**Respondent # 6**: *Once information is gathered it takes a few days to review it and upload it. We (NAME) do not have any issues with the NPS or American Trails – most of our delays can from the municipalities we were working with. Again getting good accurate information is important the vetting process to approve a new trail.*

> **NPS Response/Action Taken:** The NPS will acknowledges that much of the time required to complete this application is partner collaboration, and data and resource gathering.

**Respondent #7:** I do NOT have an hour account - however it clearly took multiple days for many. Meetings to determine direction and partnerships. Gathering the info, letters, photos, documents. Writing and proofing. We were fortunate in that there had already been a Blueways plan created - which (*NAME)*, with (*Organization)*, had spearheaded. That document gave us the foundation of what was needed for our application. It was a HUGE task.

> **NPS Response/Action Taken**: Response acknowledged

**Respondent #9:** *I think it took two people two weeks to complete the application. Finding and labelling the attachments, took an additional week of one person. At the time, we used photos on the internet. Since then, we have gone to every single access point on the Trail (not all listed on the Trail itself), which took three weeks to complete because our trail is over 40 miles long and has 60 public access points.*

> **NPS Response/Action Taken**: Response acknowledged

**Respondent #10:** *Regarding the amount of time it takes to complete the application – I would say several hours with some caveats. We had a description of the trail already on our website, so we were able to use most of that for one of the answers. Someone who doesn't have this prepared would need more time. The time it took to collect the information, fill out the form and upload photos, documents, etc. would be much longer. It took us weeks to find somebody to do the centerline data. It also took time to gather longitude, latitude, elevation, etc. Then we needed to decide which photos to include and make sure we had permission to use them.  We also had to decide who to name as the trail manager since we don't have a formal manager's position.  It also took time to find the documentation proving that we owned the 300 feet of trail that lies in a neighboring town.  The total process was probably about six weeks, but I would estimate the total actual hours spent, to be 10 – 20.*

> **NPS Response/Action Taken**: Response acknowledged

C.   **"Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?"**

**Respondent #1:** *I believe that all of these questions are clear and concise and limited to the most important information.*

> **NPS Response/Action Taken**:  Response Acknowledged

**Respondent #2:** *These revised questions are pretty clear, and it is easy to see why most of the information is requested. However, it does appear that these revised questions seek to make the NRT designation more difficult, setting a higher bar than in the past. If this is indeed the case, it might be helpful to explain the progression of the NRT and its application process, perhaps on the website.*

> **NPS Response/Action Taken:** Thank you for your response. In addition to better understanding proposed trails, these additional questions are intended to help elevate the National Recreation Trails program and better ensure designated trails are meeting the standards for a trail worthy of national recognition. We can consider additional text on our website or other places to explain these changes.

**Respondent #3**: Recommendations

1. ***Short Description of Trail*** - *Add link to website for examples.*
2. ***Detailed Description of Trail*** – *(1) Add link to website for examples and (2) add reference to new trail users, since NRT designations provide increased exposure to the trail, it would be good to highlight how new users could utilize the trail.*
3. ***Visiting and Fees*** – *(1) Consider adding question on trail rating/difficulty. This information is helpful for new or beginning trail users, especially those from underrepresented groups, to assist in determining if the trail is appropriate for their use and comfort level. (2) Consider adding a question on available trailhead amenities (restrooms, drinking water, etc.) to assist new users in identifying appropriate trails and adequately prepare for use.*
4. ***Other Related Activities Allowed*** - *Add "Cultural Resources" as other activity or to Heritage, "Cultural Resources, and history".*
5. ***Best Management Practices*** - *Consider requesting information in best management practices relating to expanding equity and access for all types of users, including from underserved communities.*
6. ***Best Management*** *Practice- Public Information* - *Add "information available in multiple languages" to list of best management practices.*
7. ***Contact Information*** - *Add option for website link to agency or organization Public Information Contact.*
8. ***Trail Manager Details*** - *Add optional inclusion of pronouns.*

NPS Response/Action Taken:

Response/ Action 1:  We will discuss with the development team on the best way to include this information.

Response/ Action 2:  We can discuss this with the development team on the best way to include this information, and additional helper text to clarify this will help highlight a trail to the public.

Response/ Action 3:  Thank you for your input. Questions 16-19 are intended to help trail users understand the difficulty of a trail by identifying slope, width, etc. We can discuss with the development team if there is an easier way to identify trail difficulty. The question on Universal Accessibility Information hopes to capture information about restrooms, and other facilities and amenities. We can discuss with the development team on the addition of a question that addresses basic trail / trailhead amenities.

Response/ Action 5:  Thank you for your input. We will discuss with the development team on the best place to add this information.

**Respondent #5**: *My only complaint was that the instructions do not tell you that the application MUST be submitted on the official NPS form. You don't find that out until the very end of the process.*

> **NPS Response/Action Taken:**  We can work with our team to make it more transparent that the application must be submitted using our official system.

**Respondent #6**: We (*NAME*) like the quality of information gathered. We would like to have the capability to make small edits on information we've uploaded or have the ability to upload a new file. Similar capability like we had during the trail application process.

> **NPS Response/Action Taken:** The NPS will work with the application system developer to ensure the capability to make edits and upload additional resources is possible.

**Respondent #7**: *An easier to use, updated portal for the application would be a WONDERFUL tool for new applicants. Specifically with more formatting options for text blocks and easier upload options for documents and photos. Also, this might get a little dicey - but if there would be a way for multiple people to access the application in process and make suggestions (like a working google doc perhaps?) that would be an amazing feature. Our proofing sessions were more difficult than tech allows now b/c this wasn't an option.*

> **NPS Response/Action Taken:** We are working with our partner now to update the application system to be more user-friendly and streamlined.

**Respondent #8**: Best Management Practice – Planning & Management last sentence "Describe any current and future planning activities and organizational capacity related to your trail." The "organizational capacity" what do mean by this? Was not clear to me, maybe could use a little word smithing for additional clarification.

> **NPS Response/Action Taken:** Planning for organization capacity means the organization that nominated or manages the trail will be around for the foreseeable future. We can work to make this language clearer.

**Respondent #9**: Following trail designation, there should be a way to update the National Water Trail website and listing, so we can include the final trail logo, final trail map, and any other changes that happen post-designation (e.g., we're not going to post signs or make trail maps with "National Water Trail" in the name until after designation). These final items should be posted to the NRT Database, rather than the pre-designation materials sent as part of the application package. Also, National Water Trails should be listed on the state pages of the nps.gov website.
There should be a template logo (e.g., outline, dimensions) and recommended sign sizes, for National Water Trails.

> **NPS Response/Action Taken:** Response acknowledged

**Respondent #10**:
1- *Our biggest stumbling block was the centerline data requirement. It took us quite a while to find someone who knew what this was and how to get it and put it in a form that could be included in the application. Luckily, there was someone at the (ORGANIZATION) who had the correct software, knowledge, and data to provide us with that information. Perhaps providing applicants with more information about that requirement and how to find the data, would be helpful.*

2- *Also, if you could please explain some of the terms used in the application such as "Agency Unit" –we had no idea what you were looking for there.*

**NPS Response/Action Taken:**
Response / Action Taken 1: In the proposed revised application questions, the request for centerline data is optional. We can add some assistance text to better clarify what this data is in the application.

Response / Action Taken 2: We can add some assistance text to better clarify what this attribute means in the application.

D. **"Any ideas you might suggest which would minimize the burden of the collection of information on respondents?"**

**Respondent #1**: *No, I feel like the burden of this application is reasonable*.

NPS Response/Action Taken:  Response Acknowledged.

**Respondent # 2**:  *There are a few parts of this application where small changes may minimize some of the burden of collection. Section 2 deals with Trail Details. I recommend amending Questions 16, 18 and 19. In Question 16, exact cumulative elevation gain may be difficult to report, especially if the NRT trail system includes multiple trails within a land management unit. This information can be important, but perhaps a range of cumulative elevation gain would be sufficient. Similarly in Questions 18 and 19, giving a range of trail grade and cross-slope percentage would be helpful for those completing the application. It will be difficult for most land managers to provide an exact grade percentage, but feasible to estimate a range of grade. I recommend eliminating Question 17 unless there is a specific purpose for this information. Additionally, in Section 2: Trail Details, it would be helpful to explain how applicants should display information about multiple trails being included in the NRT Application for their site. For example, a site may apply for NRT designation of their trail system which includes four distinct trails with different trailheads, difficulty ratings, elevation gains, etc. Should each of the questions in this section be completed for each individual trail or should the questions be completed as accurately as possible for the trail system as a whole? In Section 5: Best Management Practices I recommend a mechanism for a land management agency to upload a comprehensive planning document. Currently the application asks for supporting documents for each best management practice. However, many agencies have comprehensive plans that contain information about these various topics. For example a Public Use Plan, or a section of a Comprehensive Conservation Plan, may contain information about recreation opportunities, education, interpretation, stewardship, trail maintenance and management. As the revised application is currently written the same document may need to be uploaded multiple times, to cover the requirements of each question in this section.*

**NPS Response/Action Taken:**  Thank you for your input. Our team will work on how best to capture this information without being too time intensive and burdensome, as well as a determine a best practice for capturing this information when applying for a trail system. There will be the opportunity to upload resources that complement the Best Management Practices. Our team will discuss the best way to capture applicant Best Management Practices to minimize burden and redundancy.

**Respondent #3**: *If legally permissible, provide pre-written and fillable form for landowner consent in support of National Recreation Trail or National Water Trail Designation. This would seem to ease the burden on requesting individual letters from public and private landowners given that they've already granted public access.*

**NPS Response/Action Taken**:  Thank you for your input. We have also considered this option and will discuss if this is permissible.

**Respondent #5**:  The (*TRAIL*) application was more complicated because we were applying for the (*TRAIL*) Trail System, so had to describe seven trails, not just one. I don't know how to make that any simpler.

**NPS Response/Action Taken**:  Response Acknowledged.

**Respondent #6**:
1- Add URLs where possible. For example, on question 1 – which are you for National Recreation Trail or Water Trail? Showing the URLs may help clarify the difference between the two.

2- Specific to questions 21 and 22; consider adding scuba diving. Some water trails have clear enough water for this activity.

3- Specific to questions 22 – 24; Longer trails (like ours) have multiple put-in and take-out locations and a variety of times and fees depending on the municipality in control of that part of the trail and the launch. There needs to be a way to break this down otherwise there is no way to be clear. Our trail is mostly free and mostly open 24/7 (except during dangerous flood conditions) but there are parts that have specific hours and fees. I think in the future you may see more trail applications with multiple put-in and take-out locations.

4- Specific to questions 34 and 35; The (TRAIL) is 130 miles long and 21 access points. So, there is no real Trail Head. Perhaps these two can be combined to "Trail Access Points".

**NPS Response/Action Taken:**
Response / Action Taken 1: We will add preamble text that will include descriptions and links to this text to clarify, which trail type applicants are applying for.

Response / Action Taken 2: Thanks for the additions. We can add that option.

Response / Action Taken 3: We can either work with the application system developer to add multiple fields for the various locations or have an option to add additional text to help capture these situations.

Response / Action Taken 4: Regarding question 34, our partner who managers the NRT/NWT database needs at least one primary trail access location for display on their online database, so the public knows the general location of the trail, therefore there needs to be two questions. The additional trail access points will further assist the public in finding an access point near them. The NPS will work with the application system developer to see if we can add multiple additional trail access points.

**Respondent #9**: *We were already a National Wild and Scenic River, managed as a Partnership River, so we had a management plan (which recommended a State Water Trail) and relationships in place, so it was pretty easy for us. The most difficult part was getting the (ORGANIZATION) to address whether they had any concerns, which came up only after the application was submitted.*

*I think application forms that allow the "drag and drop" of supporting files work best. Our application had 58 supporting items to upload.*

> **NPS Response/Action Taken:** Thank you for your input. We will work with the application system developer to determine the best and easiest way to add attachments.

**Respondent #10:** I think the other key is having someone (you?) available to answer questions when needed. That should be clearly stated, maybe in multiple places. (You were very good about getting back to me about our application – thank you!)

> **NPS Response/Action Taken:** Thank you, our team can work to make our contact information more transparent.

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

As an acknowledgment of achieving designation, each trail manager receives a congratulatory letter from the Secretary of the Interior, a certificate of designation framed on a plaque, and 5 trail markers. Estimated value: $50 per NRT; $50 per NWT.

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. Information is collected and protected in accordance with the Freedom of Information Act (5 U.S.C. 552) (FOIA). The NPS Privacy Act Officer has determined a Systems of Records Notice is not required for this collection of information.

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.**

Questions of a sensitive nature are not asked.

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 conducted voluntary outreach to receive feedback regarding respondent burden. Nine (9) participants responded and the average response to complete the form is 8 hours (this does not include the prework involved with collecting the documents and resources to complete the form). We estimate that we will receive **30 annual responses** (NRT=*15* and NWT=*15*) totaling **130 annual burden hours**. The total dollar value of the annual burden hours for this collection is expected to be $**5,682** (rounded).

We used the hourly rates (including benefits) for workers listed in Table 1 of the Bureau of Labor Statistics (BLS) News Release USDL-22-1176, June 16, 2022, Employer Costs for Employee Compensation – March 2022 (https://www.bls.gov/news.release/pdf/ecec.pdf), to calculate the total annual burden. The particular values utilized are:

* Individuals:  We used the average wage and salary costs for civilian workers from Table 2, which states an hourly rate of $40.90, including benefits.
* Private Sector:  We used the average wage and salary costs for private industry workers from Table 4, which states an hourly rate of $38.61, including benefits
* States and Local Agencies:  We used the average wage and salary costs for state and local workers from Table 3, which states an hourly rate of $55.47, including benefits.

**Table 12.1 Estimated Annual Respondent Burden**

| | Total Annual Responses | Avg. Time per Response (hours) | Total Annual Burden Hours* | Hourly Labor Costs (including benefits) | $ Value of Burden Hours |
|---|---|---|---|---|---|
| **Application for Designation -- National Recreation Trails** | | | | | |
| Individual | 1 | 8 | 8 | $40.90 | $327 |
| Private Sector | 5 | 8 | 40 | $38.61 | $1,544 |
| State, Local, or Tribal Governments | 4 | 8 | 32 | $55.47 | $1,775 |
| *Subtotal* | **10** | | **0** | | **$3,647** |
| **Application for Designation -- National Water Trails** | | | | | |
| Individual | 1 | 8 | 8 | $40.90 | $327 |
| Private Sector | 3 | 8 | 24 | $38.61 | $928 |
| State, Local, or Tribal Governments | 1 | 8 | 8 | $55.47 | $444 |
| *Subtotal* | 5 | | 0 | | **$1,699** |
| **Amendments/Updates -- National Recreation Trails** | | | | | |
| Individual | 1 | 0.5 | 1 | $40.90 | $21 |
| Private Sector | 5 | 0.5 | 3 | $38.61 | $97 |
| State, Local, or Tribal Governments | 4 | 0.5 | 2 | $55.47 | $111 |
| *Subtotal* | 10 | | 0 | | **$229** |
| **Amendments/Updates -- National Water Trails** | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| Individual | 1 | 0.5 | 1 | $40.90 | $21 |
| Private Sector | 3 | 0.5 | 2 | $38.61 | $58 |
| State, Local, or Tribal Governments | 1 | 0.5 | 1 | $55.47 | $28 |
| *Subtotal* | 5 | | 0 | | *$107* |

| | | | | | |
|---|---|---|---|---|---|
| **Combined Total** | **30** | | **130** | | **$5,682** |

*\* Rounded to match ROCIS*

13. **Provide an estimate of the total annual non-hour 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 have not identified any non-hour costs.

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 **$56,973** (see Tables 14.1 and 14.2).  To determine average hourly rates, we used Office of Personnel

Management Salary Table 2022-RUS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/RUS_h.pdf).

The benefits rate was calculated from Bureau of Labor Statistics (BLS) News Release USDL-22-1176, June 16, 2022, Employer Costs For Employee Compensation – March 2022 (https://www.bls.gov/news.release/pdf/ecec.pdf).  We multiplied hourly rates by 1.6 to account for benefits.

Describe the tasks

- **Administrative Technician and Staff Assistant (new):** Organizes, packages, and ships designation materials.
- **Program Specialist:** Reviews all NRT and NWT applications to ensure they meet mandatory criteria, conducts any follow-up with applicants, organizes resources for the field review team (outdoor recreation planners), and develops designation nomination package
- **Program Leader:** Provides input and review of any documents submitted for review by NPS and DOI leadership
- **Outdoor Recreation Planners (10):** Conducts field level review of NRT and NWT applications and conduct any additional follow-up with applicants.

**Table 14.1 Annual Costs to the Federal Government**

| Personnel | GS Level | Hourly Rate | Hourly Rate incl. benefits *(1.6 x hourly pay rate)* | Total estimated staff time (hours) | Annual Cost* |
|---|---|---|---|---|---|
| **National Recreation Trails and National Water Trails** | | | | | |
| Administrative Technician | 08/05 | 26.91 | 43.06 | 80 | $3,445 |
| Staff Assistant (new) | 12/05 | 43.10 | 68.96 | 80 | $5,517 |
| Program Specialist | 12/05 | 43.10 | 68.96 | 280 | $19,309 |
| Program Leader | 14/05 | 60.56 | 96.90 | 40 | $3,876 |
| Outdoor Recreation Planners | 12/05 | 43.10 | 68.96 | 360 | $24,826 |
| | | | *Total* | *0* | *0* |

**Table 14.2 Operational Expenses**

| Activity | Costs |
|---|---|
| Materials, printing, and shipping for 15 sites | |
| • Plaques ($20x15) | $300 |
| • 5 signs ($20x15) | $300 |
| • Printing and shipping of certificates and letters ($10x15) | $150 |
| Website and Database Management | $5,000 |
| **Total** | 05,750 |

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

Updates to the NRT and NWT application questions were deemed necessary to ensure applications were uniform where appropriate, capture the needs of emergent recreation trends and ensure applications met the standard for national recognition. The NRT application has added a section on best management practices, which program staff and colleagues deemed appropriate to better align with the NWT application and ensure potential trails are meeting the needs of the public and standards for national recognition.

Based on the responses in Question 8 above, the average time to complete the forms is 8 hours (this does not include the prework involved with collecting the documents and resources to complete the form). We estimate that we will receive 30 annual responses (NRT=*15* and NWT=*15*) totaling 130 annual burden hours. This change a net increase of 2 annual responses and a net decrease of 55 total burden hours.

**Table 15.1. Program changes**

| Information Collection | Annual Number of Responses | | | Annual Burden Hours | | |
|---|---|---|---|---|---|---|
| | Previously Approved | Current Request | Program Change | Previously Approved | Current Request | Program Change |
| National Recreation Trails Application (State, Local, and Tribal Govt) | 8 | 4 | -4 | 64 | 32 | -32 |
| National Water Trails System Application (Individual) | 1 | 1 | 0 | 11 | 8 | -3 |
| National Water Trails System Application (Private Sector) | 2 | 3 | 1 | 22 | 24 | 2 |
| National Water Trails System Application (State, Local, and Tribal Govt) | 3 | 1 | -2 | 33 | 8 | -25 |
| Amendments/Updates - National Recreation Trails (Private Sector) | 1 | 5 | 4 | 1 | 3 | 2 |
| Amendments/Updates - National Recreation Trails (State, Local, and Tribal Government) | 3 | 4 | 1 | 2 | 2 | 0 |
| Amendments/Updates - National Water Trails System (Private Sector) | 1 | 3 | 2 | 1 | 2 | 1 |
| *Unchanged* | **9** | **0** | **0** | **51** | **0** | **0** |
| *Total* | **0** | **0** | **0** | **0** | **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 the report, publication dates, and other actions.**

Upon designation as an NRT or NWT, new trails are added to the NRT/NWT online database. No other information is 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 forms and other appropriate materials.

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.