

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Application and Reports for Paleontological Permits, 43 CFR 49 OMB Control Number 1093-1008

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.

In 1999, the Senate Interior Appropriations Subcommittee requested that the Department of the Interior (we, DOI), the U.S. Department of Agriculture – Forest Service (USDA–FS), and the Smithsonian Institution prepare a report on fossil resource management on Federal lands (Sen. Rep. 105–227, at 60 (1998)). The request directed these entities to analyze the:

- Need for a unified Federal policy for the collection, storage, and preservation of fossils.
- Need for standards that would maximize the availability of fossils for scientific study.
- Effectiveness of current methods for storing and preserving fossils collected from Federal lands.

During the course of preparing the report, the agencies held a public meeting to gather public input. The DOI report to Congress, “Assessment of Fossil Management of Federal and Indian Lands,” was published in May 2000. After the report was released, the Paleontological Resources Preservation Act (PRPA) was introduced in the 107th Congress. PRPA emphasized the recommendations and guiding principles in the May 2000 report. The legislation was reintroduced in subsequent Congresses through the 111th Congress when it was included as a subtitle in the Omnibus Public Land Management Act, which became law on March 30, 2009. Legislative history demonstrates that PRPA (16 U.S.C. 470aaa–aaa-11) was enacted to preserve paleontological resources for current and future generations because these resources are nonrenewable and are an irreplaceable part of America's heritage. PRPA requires that implementation be coordinated between the Secretaries of the Interior and Agriculture and that DOI and USDA issue regulations as appropriate to carry out the law.

Accordingly, DOI and USDA formed an interagency coordination team in April 2009 to draft the proposed regulations. Members of the team included program leads for paleontology and regulatory specialists from the Bureau of Land Management (BLM), the National Park Service (NPS), the Bureau of Reclamation (Reclamation), the U.S. Fish and Wildlife Service (FWS) (the bureaus), and the USDA-FS.

On April 17, 2015, the USDA-FS published regulations implementing the PRPA on National Forest System lands ([80 FR 21588](#)).

On August 2, 2022, DOI published a final rule under RIN 1093-AA25 ([87 FR 47296](#)) to implement PRPA. The final rule directs the bureaus to preserve, manage, and protect paleontological resources on lands administered by the BLM, NPS, Reclamation, and FWS and ensure that these resources are available for current and future generations to enjoy as part of America's national heritage. The rule addressed the management, collection, and curation of paleontological resources from Federal lands using scientific principles and expertise, including

collection in accordance with permits, curation in an approved repository, maintenance of confidentiality of specific locality data, and authorization of penalties for prohibited acts.

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.

Information collected will allow DOI bureaus to:

- inventory paleontological resources,
- implement the permitted collection of fossils from the ground,
- preserve collected fossils in repositories,
- track and report the location and condition of paleontological resources,
- implement civil penalties provisions with due process considerations, and
- monitor the results of scientific investigations that involve the use of paleontological resources in both the field and in museum collections.

We are proposing to collect the following information associated with paleontological permits for work on lands administered by the BLM, Reclamation, and FWS:

FORMS

DI Form 9002, “Paleontology Permit Application” (§ 49.115) – Permit applicants proposing to work in areas administered by BLM, Reclamation, or FWS must provide the information requested by the DI Form 9002. Such information includes:

1. Applicant’s name, affiliation, and contact information.
2. Description of the applicant’s qualifications, to include a current resume for the applicant and all other persons who will oversee fieldwork and other work, and information on the applicant’s past performance on previous permits.
3. Maps and other location information, and estimated start and end dates of proposed work.
4. Description, purpose and methodology of proposed work, including a detailed scope of work or research plan for the proposed activity, logistical information, methods that will be employed to explore for or remove the paleontological resources, proposed content and nature of any collection to be made under the permit.
5. Information about the proposed repository.
6. Description of anticipated costs, including bonding information.

This form gathers the information necessary to establish that an applicant is qualified to perform the work that they propose and that they have an appropriate arrangement with an approved repository to receive collections when field work is complete.

DI Form 9003, “Paleontology Permit” (§ 49.125(a)) – DOI uses this form to issue the paleontology permit once it is approved. The form does not collect information but provides details concerning the authorized work, as well as the terms and conditions to the permittee.

DI Form 9004 and DI Form 9004-BLM, “Paleontology Locality information” (§ 49.125(a)(1) & (6)) – Permittee will record locality information on DI Form 9004, 9004-BLM, or in another format approved by the bureau in the permit that captures the same information.

Collecting this information forms the basis of the bureau's inventory of paleontological resources, required by statute.

DI Form 9006, “Paleontology Permit Report” (§ 49.125(a)(14)) – Permittees conducting activities on lands administered by BLM, Reclamation, or FWS must submit reports to the bureaus using DI Form 9006 as a cover sheet. Under some permits, one report may be required summarizing all activities; whereas other permits may require multiple reports for separate activities under the permit. We use the reports to track and manage paleontological resources and provide program accountability.

DI Form 9007, “Repository Receipt of Collections (Paleontology)” (§ 49.125(a)(10) & (11)) – Permittee must deposit the collection in the approved repository named in the permit by the date specified in the permit and provide the bureau with DI Form 9007, which includes a certification by the permittee that the collection and other associated records were transferred to the repository and a certification by the approved repository's authorized official that the collection was received. This provides a chain of custody to establish that important paleontological resources remain in the public domain.

REGULATORY REQUIREMENTS

Resource damage or theft (§ 49.125(a)(7)) – Permittee must report suspected or apparent resource damage or theft of paleontological or other resources to the Federal land manager as soon as possible, but not to exceed 48 hours, after learning of the suspected or apparent damage or theft.

List and description of paleontological resources (§ 49.125(a)(12)) – If the permittee has not transferred the collection to the approved repository named in the permit by the date specified in the permit, the permittee must provide the Federal land manager a list and description of all paleontological resources collected, their current location, and propose a revised date that the required transfer of paleontological resources will occur.

Amendments to permits (§ 49.130(a)) – Permittees may request a modification to a permit. Modification requests will include permittee name, permit number, and the reason(s) for the modification request.

Objecting to a notice of violation (§ 49.515(a) & (b)) – When a person receives a notice of violation, the person has 30 days from the date the notice was received to object by submitting to the Federal land manager documentation to support the position that the person did not commit a violation or that the proposed penalty should be reduced or eliminated.

Responding to a civil penalty (§ 49.535(a) & (b)) – A person may request a hearing on the Federal land manager's final assessment of a civil penalty by filing a request for hearing via registered or certified mail (return receipt requested or other delivery method, delivery receipt requested) to the Departmental Cases Hearings Division, Office of Hearings and Appeals, Department of the Interior, at the address specified in the final assessment of civil penalty. A copy of the request must be served on the Solicitor of the Department of the Interior at the address specified in the final assessment of civil penalty. The request for hearing must include the following information:

1. The reasons for challenging the final assessment;
2. The relief sought and the basis for the relief;

3. A copy of the original notice of civil violation and proposed civil penalty assessment;
4. A copy of any objection and supporting documentation filed under § 49.515(a) & (b);
5. A copy of the final assessment of civil penalty; and
6. A certificate of service acknowledging service of the request for hearing with the accompanying documentation on the Office of the Solicitor.

NOTE: OMB has reviewed and approved the information collection requirements associated with the NPS' application and reports for paleontological permits (OMB Control Number 1024-0236, [Research Permit and Reporting System Applications and Reports \(36 CFR 2.1 and 2.5\)](#)).

PROPOSED REVISIONS

With this submission, we propose the following revisions to the currently approved information collections described above:

1. **DI Form 9002, "Paleontology Permit Application"** (§ 49.115) – New fields proposed:
 - a. Provide State or administrative area (i.e., forest or NPS unit) where proposed work will occur. This will allow DOI offices to assign local contacts to assist applicants and to track work for administrative accountability.
 - b. Is the proposed work identified as hazardous? (Yes/No). For example, work in caves, with helicopters, or using high angle rigging or ropes. This will allow bureau offices to learn if an applicant's proposed work might be identified as hazardous to either the applicant or the public.
 - c. RAPTOR account creation. This field will provide electronic access to the BLM Recreation and Permit Tracking & Online Reporting (RAPTOR) system. The information will be collected during RAPTOR account creation and then used to autofill all forms. This additional burden hours expended while setting up a RAPTOR account will be offset by the autofill feature of the system. Applicants who are unable to use the RAPTOR system will continue to use the original DI 9002 format.
2. **DI Form 9004 "Paleontology Locality information"** (§ 49.125(a)(1) & (6)) – The original DI Form 9004 form will remain unchanged, but BLM proposes an additional format (DI Form 9004-BLM) that allows permittees to report multiple localities in a single spreadsheet. Applicants requested the capability for a single spreadsheet upload which has proven to expedite data submission for permittees while also reducing administrative burden to the bureau.
3. **DI Form 9007, "Repository Receipt of Collections (Paleontology)"** (§ 49.125(a)(10) & (11)) – We are not proposing changes to the currently approved fields on the DI 9007; however, we plan to update the instructions to state that permittees may substitute this form with a copy of the approved repository's museum accession record. This record, provided by the repository, follows a museum best practice and industry standard and so may be submitted in place of DI 9007 in order to reduce duplication of effort.

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.

We plan to make the forms available on the Department's Enterprise Forms website. Respondents will be able to complete the forms online and submit them electronically.

The BLM issues permits through the Recreation And Permit Tracking & Online Reporting system (RAPTOR). This system leverages technology to issue and track permits and provides the basis for paleontology inventory, required by statute. The system uses the same information provided on these forms (DI Form 9002 – DI Form 9007) but with features such as autofill and bulk uploading allow applicants and permittees to interact in real time with permits and to report in less time than by using paper forms. The RAPTOR system provides efficiencies by reducing the time required to manage permits by both bureau employees and the public.

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 NPS utilizes an online scientific research and collection permitting system which includes permits for paleontological research and collection in park units, and for which information collection has been approved (OMB 1024-0236). Under the permitting provisions of 43 CFR 49 NPS retains its existing permitting system for paleontological research and collection so that permit applicants on NPS lands do not have to apply for two redundant permits (one permit under the existing system and one under the 43 CFR 49).

The BLM utilizes RAPTOR (see Item 3 above) to issue and track paleontology permits. This information technology investment reduces burden by allowing both bureau employees and the public to interact with the permit process in real time and reduces duplication of effort by auto-filling fields that have already been provided to the system, such as an applicant's or permittee's institutional information, permit numbers, and other information. The proposed Form DI 9004-BLM will also allow permittees to upload multiple paleontological locations on a single form rather than requiring the permittee to fill out separate forms for each paleontological discovery they need to report.

Reclamation and FWS do not have comparable IT systems for managing paleontological research and collections so both Bureaus will continue to implement the paper forms provided in this information collection request. These two Bureaus collectively issue fewer than 50 permits each year.

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

We collect only the minimum information necessary to preserve paleontological resources. Small entities that may be affected by the information collection requirements under PRPA include academic institutions and businesses that engage in assessment or mitigation of paleontological resources. The steps involved in applying for a paleontological permit and submitting required reports are not cumbersome in terms of either personnel time or materials cost.

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.

We cannot collect the information less frequently because collection is triggered in response to an applicant's expressed desire to conduct scientific research, educational activities, collecting, or assessment and mitigation of bureau-managed paleontological resources. Reports and other information are collected on occasion or annually.

If the information were not collected, we would:

- (1) not have information on the location and condition of paleontological resources in the field or in museum collections and could not build or maintain an inventory of paleontological resources;
- (2) be unable to issue paleontological resource use permits to support scientific, educational, or statutorily required assessment or mitigation efforts;
- (3) be unable to track and report on scientific research;
- (4) be unable to implement the civil penalties provisions of PRPA; and
- (5) fail to implement mandates of the PRPA, which requires bureaus to manage paleontological resources using scientific principles and expertise.

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.

Permittee must report suspected resource damage or theft of paleontological or other resources to the Federal land manager as soon as possible, but not to exceed 48 hours, after learning of such damage or theft (43 CFR 49.125(a)(7)). This short time frame is necessary to allow law enforcement to collect data in support of a criminal or civil penalty assessment.

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

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

disclosed, or reported.

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

On May 27, 2025, we published in the *Federal Register* (90 FR 22318) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on June 26, 2025. We did not receive any comments in response to that notice.

In addition to the *Federal Register* notice, we consulted with the nine (9) individuals identified below who are familiar with this collection of information in order to validate our time burden estimate and asked for comments on the questions below:

Organization

Dickinson Museum Center
Denver Museum of Nature and Science
Denver Museum of Nature and Science
University of Washington Burke Museum
University of Washington Burke Museum
Kadmas Lee & Jackson Consultants, Inc.
Elevation Science Institute
Science Museum of Minnesota
SWCA Consultants, Inc.

Title

Curator of Paleontology
Curator of Vertebrate Paleontology
Collections Manager for Earth Sciences
Hell Creek Project Collections Manager
Curator of Vertebrate Paleontology
Paleontologist
Paleontologist, Executive Director
Curator of Paleontology
Project Paleontologist

“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: All respondents understood the necessity for the questions provided on the forms and did not ask for fewer questions.

Agency Response/Action Taken: We will continue to evaluate the information that we collect to ensure that it meets but doesn’t exceed statutory needs.

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

Comments: All respondents reported being able to gather information, fill out the forms, and submit them consistent with the original time estimates.

Agency Response/Action Taken: We estimate that the burden to fill out the paper forms will remain the same as the original time estimates. BLM estimates that the time spent managing permits using the RAPTOR online system will go down for both the public and for bureau employees.

Comments: Multiple permittees reported that reporting localities (DI 9004) “takes too much time” when reporting on multiple discoveries because the form requires that similar information be provided on successive copies of the form.

Agency Response/Action Taken: We recognize that providing the same information on successive forms constitutes a duplication of effort, so we are providing a new version of the form (DI 9004-BLM) that allows respondents to avoid duplication of effort by uploading multiple records in a single spreadsheet file. Duplication of effort is not an issue when there are very few locations to report so permittees who prefer to provide locality information one record at a time may still use the original form (DI 9004).

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

Comments: Some respondents asked for space to provide more information than was requested.

Agency Response/Action Taken: Applicants and permittees are allowed to append additional information to their responses and electronic systems allow plenty of space for responses. Additionally, the new version of DI 9004 (DI 9004-BLM) will allow permittees to separate information on a spreadsheet while also allowing multiple locations to be provided on a single form.

Comments: Some respondents asked for more information on how to find assistance filling out forms. Others asked for feedback from bureaus when information has been received.

Agency Response/Action Taken: These are reasonable requests. Detailed information about which forms to use and how to use them will be expanded on agency websites. Bureaus will also be asked to provide more frequent communication with applicants and permittees about the status of a permit. Electronic permit systems provide detailed information and training videos as appropriate.

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

Comments: Respondents have reported that the annual report (DI 9007) is redundant with the information that permittees provide to repositories.

Agency Response/Action Taken: Permittees are allowed to submit annual report information on a non-government form, such as one required by the repository, when that form contains the same information as the DOI form (DI 9007).

Comments: Some bureau offices require more detailed information about where fossils might be found than the applicant is able to provide when they are applying for a permit.

Agency Response/Actions Taken: Some projects, such as work in NPS units or on planned excavations, should be identified to the most specific area of work as possible. Conversely, applicants who would do a general survey of a large area or consultants who might not know the specific assignment of area should be allowed to apply for a permit before the specific area of discovery is identified. Understanding that each permit is unique, bureaus will work with applicants to establish the appropriate area of authorization before issuing a permit.

Additional comments received during the outreach:

Comments: Respondents requested that it be easier to modify a permit, such as for authorized

investigators who are named on the permit, area of authorization, or ending dates of a permit.

Agency Response/Actions Taken: We recognize the need for permit modifications. Applicants and permittees need to communicate with the bureau to determine when a new form needs to be submitted or when a minor modification can be accommodated.

Comments: One applicant requested more space on the application form (DI 9002) to request multiple co-investigators to be listed on a permit.

Agency Response/Actions Taken: Applicants may append additional information to any of these forms. The request to authorize multiple co-investigators on a permit are considered by bureaus on a case-by-case basis.

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

We do not provide payments or gifts to respondents.

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

Personal information collected on these forms is protected by the Privacy Act of 1974 systems of records notice [DOI-20, Paleontological Resources Preservation System](#) (October 2, 2019, 84 FR 52530). We provided a copy of the SORN, as well as the associated Privacy Threshold Analysis documents for each bureau, as supplementary documents in ROCIS.

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.

No questions of a sensitive nature will be 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 estimate that we will receive **4,515 responses** totaling **7,350 annual burden hours**. We estimate the total dollar value of the burden hours to be **\$349,863** (rounded). These estimates reflect information collected by BLM, Reclamation, and FWS to manage paleontological resource permits and respond to appeals made during the civil penalty process. We provided the burden calculations as a supplementary document titled “1093-0008 Attachment A – Burden Calculations” in ROCIS.

Burden associated with NPS paleontological permits and reports is approved under OMB Control Number 1024-0236.

We used the Bureau of Labor Statistics (BLS) [News Release](#) USDL-25-1358, September 12, 2025, Employer Costs for Employee Compensation—June 2025, to estimate the total hourly wages based on the following:

- Individuals – the hourly rate for all workers is \$48.05, including benefits.
- Private Sector – the hourly rate for all workers is \$45.65, including benefits.
- Government – the hourly rate for all workers is \$63.94, including benefits.

Of the 1,845 estimated annual responses, we estimate that most (75%, or 1,385) responses will be made by organizations or businesses such as museums or universities, 20% (368) responses will be made by individuals, and 5% (92) will be made by state, local or tribal governments. It is unlikely that each respondent will make all of the responses listed in the tables above, but instead will make only some of the responses. The majority of the people who apply for a permit (DI Form 9002) and receive a permit will likely not be assessed a civil penalty. Mirroring this, the majority of people who would be assessed a civil penalty would not apply for a permit.

It is important to note that these are not new burden hours, because the permitting documents listed in the table above will replace the bureaus’ existing permitting documents and appeal processes which already have information collection burdens.

Also, for OMB’s awareness, there are approximately 20 permits issued to the Federal Government annually.

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 estimate the nonhour cost burden for this information collection to be approximately **\$228,876** annually (1,525,838 x \$0.15). The curation of DOI collections is either by mutual agreement after a permit applicant asks to curate a proposed collection under the permit or is requested by the repository when a researcher associated with the institution applies for a permit to conduct paleontological studies and excavations on DOI land.

Data from the DOI Museum Annual Report for FY 2017 indicates that DOI spent \$0.15 for the ongoing curation of each object held in a bureau facility that fiscal year. There was a total of 1,525,838 objects catalogued and curated in FY 2017. This is the most recent data available for objects catalogued and curated in bureau facilities.

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 cost to the Federal Government to administer this information collection is **\$585,360** (9,000 hours x \$65.04 hourly rate).

To determine average annual salary costs, we used the Office of Personnel Management Salary Table [2025-RUS](#) to obtain the nationwide rate for a GS-11/05 (\$40.15) representing the average grade/step of the bureau personnel who may be engaged in reviewing and approving permits and the other information collection activities described above. We then multiplied the hourly rates by 1.62 in accordance with the [BLS News Release](#) USDL-25-1358, to calculate the fully burdened rate of \$65.04. We estimate the 440 permits/year and 10 civil penalty appeals/year would each consume 20 hours of Federal employee time for a total of 9,000 hours.

Again, it is important to note that this was not a new cost when the collection was initially approved by OMB in 2022. Federal employees were already engaged in this type of information collection under existing legal and regulatory authorities for permitting and penalties, which the information collection replaced.

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

We are reporting changes due to adjustment in agency estimate of 2,670 annual responses and 2,290 annual burden hours, as well as the changes to forms outlined in question 2 above.

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 data from this information collection.

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

We will display the OMB Control Number and expiration date on the forms and other applicable documents.

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.