

**1SUPPORTING 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 information collected through

- **Form 10-1002**, *National Recreation Water Trail Application*
- **Form 10-1003**, *National Recreation Trail Application*
- **Form 10-1004** is used by the National Park Service (NPS) to evaluate applications for designation as a National Recreation Trail (NRT) or National Water Trail (NWT).

The NPS specifically uses this information to:

- **Assess Eligibility and Compliance:** Determine whether the proposed trail meets the criteria for designation, including adherence to best management practices and program standards.
- **Verify Supporting Documentation:** Review maps, photographs, landowner consent, and other materials to confirm the accuracy and completeness of the application.
- **Facilitate Decision-Making:** Ensure that trails designated as NRT or NWT provide public benefit, meet sustainability requirements, and align with program goals.
- **Create Public Resources:** After designation, the collected information is used to develop trail profiles and informational pages on the NRT/NWT websites. These resources provide federal employees, partners, and the public with accurate details about designated trails, including location, amenities, and accessibility.
- **Maintain Program Integrity:** Information from update forms (Form 10-1004) ensures that trail data remains current and reflects any changes post-designation, supporting ongoing management and public engagement.

This process helps NPS maintain transparency, promote outdoor recreation opportunities, and ensure that designated trails meet national standards for quality and sustainability.

Recent minor revisions to the NRT and NWT applications aim to clarify trail attributes, improve public information, and align questions to create a more consistent and streamlined application process.

Once a trail is designated, information collected through the application process is used to develop informational web pages on the NRT/NWT website. These online resources provide federal employees and the public with detailed information about designated trails, supporting transparency and public engagement.

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 March 13, 2026, we published in the Federal Register (91 FR 12441) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on May 12, 2026. 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 processes we use to collect information. The following table includes the titles and organizations of the individuals providing feedback to our request.

Position	Affiliation
1. Executive Director	American Trails
2. Board Member	Back Bay National Wildlife Refuge Society
3. Board Member	Trinity Coalition
4. Refuge Manager	Back Bay National Wildlife Refuge

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.”

Overall, respondents agreed that the questions in the application are necessary and have practical utility for determining whether a proposed trail meets program standards. Several respondents emphasized that the questions are reasonable, relevant, and essential for NPS to make informed decisions and for promotional efforts. While most found the information collection appropriate, some noted areas for improvement. One respondent suggested that directions for multi-trailhead locations could be more specific, and another highlighted redundancy between sections on Public Information and Trail Management. Additionally, concerns were raised about overlapping questions and the depth of detail required in certain sections, such as Best Management Practices and tread width measurements, which some felt were excessive or unclear. Despite these observations, the majority expressed support for the comprehensiveness of the application and acknowledged its role in ensuring accurate evaluation and public accessibility.

NPS Response

The National Park Service acknowledges the feedback provided by respondents and appreciates their input. In response to specific concerns, NPS has revised the application to remove the question about trail directions and added fields for multiple trailhead locations. The team will also review and clarify language in the Public Information section to avoid redundancy with other best management practices. Regarding the inclusion of Best Management Practices and technical details such as elevation, width, grade, and cross slope, these questions are intended to enhance understanding of trail sustainability and provide valuable information for the public through the National Recreation Trail database. Overall, NPS recognizes the importance of balancing thoroughness with clarity and will continue refining the application to ensure it remains practical and useful.

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?”

Estimates of the time required to complete the application varied widely among respondents. Some indicated that a thorough job could take as little as two to four hours, while others reported significantly longer timelines, ranging from several days to multiple weeks, depending on the complexity of the trail and the availability of supporting materials. A few respondents provided detailed breakdowns, estimating around 4.75 hours for all sections, while others noted that collecting data, coordinating with partners, and gathering attachments could extend the process to six weeks or more. Factors influencing time included trail length, number of access points, need for technical data such as centerline and elevation, and obtaining permissions for photos and documentation. Overall, respondents agreed that while completing the form itself may take hours, the full process of compiling accurate information and supporting materials can require substantial effort and collaboration.

NPS Response

The National Park Service acknowledges the wide range of time estimates provided and recognizes that much of the time required to complete the application involves partner collaboration and gathering data and resources. While the form completion may take only a few hours in some cases, additional time for collecting supporting documentation, technical specifications, and coordinating with stakeholders can significantly increase the overall burden. NPS will continue to consider these factors when evaluating the estimated burden and will strive to ensure the process remains as efficient and practical as possible.

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

Overall, respondents found the questions clear and concise, but several offered suggestions to enhance quality, utility, and clarity. Recommendations included adding links to examples for trail descriptions, clarifying terms such as “organizational capacity” and “Agency Unit,” and providing guidance on technical requirements like centerline data. Respondents suggested incorporating questions on trail difficulty ratings, amenities, and accessibility features to better inform new and underrepresented users. Additional ideas included expanding best management practices to address equity, multilingual information, and cultural resources, as well as improving instructions to make it clear that applications must be submitted via the official NPS form. Others requested system improvements such as the ability to edit uploaded files, a more user-friendly portal with collaborative features, and post-designation update capabilities for logos and maps. Finally, respondents recommended clearer explanations of new requirements and the rationale behind raising the application standards.

NPS Response

The National Park Service appreciates these thoughtful suggestions and will work with the development team to incorporate improvements where feasible. Planned actions include clarifying language in the application, adding assistance text for technical requirements such as centerline data, and making certain attributes easier to understand. NPS will explore adding links to examples, questions on trail difficulty and amenities, and options for multilingual information and equity considerations. System enhancements are underway to create a more user-friendly portal with editing capabilities and streamlined uploads. Additionally, NPS will consider providing clearer instructions on submission requirements and explaining changes to the application process on its website. These efforts aim to improve clarity, usability, and accessibility while maintaining the integrity of the National Recreation Trails program.

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

Most respondents felt the burden of the application was reasonable, but several offered suggestions to minimize it. Recommendations included allowing ranges instead of exact figures for elevation gain, trail grade, and cross-slope, and clarifying how to report details for trail systems with multiple trails. Others suggested eliminating unnecessary questions, enabling the upload of comprehensive planning documents rather than repeating attachments, and providing pre-written, fillable consent forms for landowners. Additional ideas included adding URLs for clarity, accommodating multiple access points and variable fees for long trails, and improving the application portal with features like drag-and-drop uploads and collaborative editing. Respondents also emphasized clearer instructions, better guidance on technical requirements, and making contact information for assistance more visible. Overall, suggestions

focused on reducing redundancy, improving clarity, and streamlining the application process.

NPS Response

The National Park Service appreciates these recommendations and will work to reduce burden while maintaining the integrity of the application process. Planned actions include exploring options for ranges in technical data fields, clarifying instructions for trail systems, and allowing comprehensive planning documents to cover multiple best management practices. NPS will also consider adding pre-written consent templates, improving the application portal with user-friendly features such as drag-and-drop uploads and multiple access point fields, and providing clearer preamble text and guidance for technical requirements. Additionally, efforts will be made to make contact information more transparent and ensure applicants have support throughout the process. These changes aim to minimize redundancy and enhance usability without compromising the quality of information collected.

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).

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. The six (6) individuals in Question 8 above responded that the average time 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**. We estimate the dollar value of the burden hours is **\$6,886** (rounded). We used the Bureau of Labor Statistics News Release - USDL-26-0505 March 20,2026, Employer Costs for Employee Compensation—December 2025¹ to calculate the hourly rates.

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	\$48.78	\$390
Private Sector	5	8	40	\$46.15	\$1,846
State, Local, or Tribal Governments	4	8	32	\$65.68	\$2,102
Subtotal	10		80		4338
Application for Designation -- National Water Trails					
Individual	1	8	8	\$48.78	\$390
Private Sector	3	8	24	\$46.15	\$1,108
State, Local, or Tribal Governments	1	8	8	\$65.68	\$525
Subtotal	5		40		2023
Amendments/Updates -- National Recreation Trails					
Individual	1	0.5	1	\$48.78	\$49
Private Sector	5	0.5	3	\$46.15	\$139
State, Local, or Tribal Governments	4	0.5	2	\$65.68	\$131
Subtotal	10		6		319
Amendments/Updates -- National Water Trails					
Individual	1	0.5	1	\$48.78	\$49
Private Sector	3	0.5	2	\$46.15	\$92
State, Local, or Tribal Governments	1	0.5	1	\$65.68	\$66
Subtotal	5		4		207
Combined Total	30		130		6,886

* Rounded to match ROCIS

¹ <https://www.bls.gov/news.release/ecec.nr0.htm>

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 **\$70,006** (see Tables 14.1 and 14.2). To determine average hourly rates, we used Office of Personnel Management Salary Table 2026-RUS²

The benefits rate was calculated using the previously mentioned BLS News Release. We multiplied hourly rates by 1.6 to account for benefits.

² <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2026/locality-pay-area-definitions/>

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	30.35	48.56	80	\$3,885
Staff Assistant (new)	12/05	48.61	77.78	80	\$6,222
Program Specialist	12/05	48.61	77.78	280	\$21,778
Program Leader	14/05	68.30	109.28	40	\$4,371
Outdoor Recreation Planners	12/05	48.61	77.78	360	\$28,000
Total				185322	244.48

Table 14.2 Operational Expenses

Activity	Costs
Materials, printing, and shipping for 15 sites	
• Plaques (\$20 x 15)	\$300
• 5 signs (\$20 x 15)	\$300
• Printing and shipping certificates and letters (\$10 x 15)	\$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.

There are no program changes.

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.