

**Supporting Statement A for
Paperwork Reduction Act Submission**

**Gathering of Certain Plants or Plant Parts by Federally Recognized
Indian Tribes for Traditional Purposes, 36 CFR 2**

OMB Control No. 1024-0271

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 2016, the National Park Service (we, NPS) published a final rule “Gathering of Certain Plants or Plant Parts by Federally Recognized Indian Tribes for Traditional Purposes” in 36 CFR 2. This rule authorizes agreements between the NPS and federally recognized Indian tribes to allow the gathering of plants or plant parts by designated tribal members for traditional purposes in parks where Congress has not specifically authorized such gathering. The agreements explicitly recognize the special government-to-government relationship between Indian tribes and the United States and are based upon mutually agreed upon terms and conditions subject to the requirements of 36 CFR 2.6(f). The agreements serve as the documents through which the NPS authorizes tribal gathering and are implemented by an accompanying permit authorized by 36 CFR 1.6.

The plant gathering agreements facilitate the continuation of tribal cultural traditions on traditionally associated lands that now are included within units of the National Park System without impairment to park resources and values. The plant gathering regulation respects tribal sovereignty and the government-to-government relationship between the United States and the tribes and provides system-wide consistency to this aspect of NPS-Tribal relations.

Additionally, the NPS Organic Act (54 U.S.C. 100751(a)) gives management discretion to the NPS to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute an impairment of the affected resources and values. The policies define impairment as an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the

direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.

Legal Authorities

- 54 U.S.C. 100101 - NPS Organic Act
- 42 U.S.C. 4321 - National Environmental Policy Act
- 36 CFR 2 - Gathering of Certain Plants or Plant Parts by Federally Recognized Indian Tribes for Traditional Purposes
- 36 CFR 1.6 - Permits

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.

Federally recognized Indian tribes submit written requests (in the form of a letter) to NPS unit managers to initiate the consultation process for a plant gathering agreement. To make determinations NPS unit managers may need to collect additional information from the Indian tribes making the requests and from the specific tribal members who will participate in the authorization process. According to NPS statutory requirements and policy, the information will help determine:

- acceptable traditional practices
- traditional uses to be accommodated,
- plant materials are specifically needed, and
- locations specifically identified for gathering the requested plant materials

We will use the information collected to make determinations and to administer any plant-gathering agreements subsequently developed.

Table 2.1 Initial Request

What NPS Collects	Why
Explanation of the traditional association that the Indian tribe has with park areas	To determine the tribe's traditional association with the park area.
Explanation of the traditional purposes to which the plant gathering activities will relate	To determine that the proposed plant gathering is a traditional use of the park area by the Indian tribe.
Description of the plant gathering activities that the Indian tribe is interested in conducting	To analyze any potential impacts of the proposed gathering in accordance with the requirements of the National Environmental Policy Act and other applicable laws.

Table 2.2. Agreement

What NPS Collects	Why
Name of the Indian tribe authorized to gather certain plants or plant parts; and the basis for the tribe's eligibility to enter into the agreement.	Identifies the tribe authorized to gather certain plants or plant parts.
Description of the protocols used for gathering as agreed by the park and the tribe. This includes identifying the tribal members designated by the Indian tribe to gather plants or plant parts.	This serves as a means for the tribal government to provide collecting protocols and to keep the NPS informed of the tribal members authorized to gather plants or plant parts.
Description of the specific plants or plant parts that may be gathered.	Identifies the plants or plant parts authorized for gathering.
Specification of the size and quantity of the plants or plant parts that may be gathered and removed. Identification of the times and locations at which the plants or plant parts may be gathered and removed Identification of the methods that may be used for gathering and removal Protocols for monitoring gathering and removal activities. Operating protocols and remedies for noncompliance with the terms of the agreement	Establishes NPS-Tribal protocols for monitoring park resources subject to gathering, and for administering protocols for noncompliance.
Key Officials	Identifies park and tribal leadership for contact purposes relating to the agreement.

NPS park units will issue NPS Form 10-114, "Special Use Permit" to tribes upon completion of a plant gathering agreement. The regulation (36 CFR 2.6(k)) includes an appeals process that allows a tribe to appeal a Superintendent's decision not to enter into a plant gathering agreement with a tribe. If a Superintendent denies a tribe's request to enter into a gathering agreement, then the Superintendent will provide the tribe with a written decision setting forth the reasons for the denial. Within 60 days after receiving the Superintendent's written decision, the tribe may appeal, in writing, the Superintendent's decision to the Regional Director. The appeal should set forth the substantive factual or legal basis for the tribe's disagreement with the Superintendent's decision and any other information the tribe wishes the Regional Director to consider. Within 45 days after receiving the tribe's written appeal, the Regional Director will issue and send to the tribe a written decision that affirms, reverses, or modifies the Superintendent's decision. The Regional Director's appeal decision will constitute the final agency action on the matter. Appeals under this section constitute an administrative review and are not conducted as an adjudicative proceeding.

Table 2.3 Appeals Process

What NPS Collects	Why
Information from the tribes supporting the traditional association	Allows the tribes to provide additional information on the historical relationship of the tribe with the specific-park area in the event agreement is denied on this issue
Information from the tribes on the traditional use of plants or plant parts to be gathered	
Information from the tribes on environmental issues	

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 estimate that 100% of initial requests and appeals will be submitted in writing via email. The initial written request and any appeals may also be submitted to individual parks via email.

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.

No other Federal government entity collects similar information. Each agreement describes the particular traditional association that an Indian tribe has to the park area, the traditional purposes to which the plant gathering activities will relate, and a description of the plant gathering activities that the Indian tribe is interested in conducting. Thus, each agreement is unique, and the information is specific to each agreement between the requesting Indian tribe and the park.

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

This information 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.

The NPS would not be able to enter into plant gathering agreements with federally recognized Indian tribes as required by 36 CFR 2.6. In addition, 36 CFR 2.6 requires an environmental analysis of the type, quantity, location of and collection methods for the plants or plant parts that will be gathered, before agreements can be finalized.

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 will cause us to collect this information in a manner that is inconsistent with OMB guidelines. We collect the information necessary to meet the requirements of 36 CFR 2.6. To the extent permitted by applicable law, including 54 U.S.C. 100707, the Archaeological Resources Protection Act, and the NHPA, the NPS will withhold from public disclosure information about the specific location, character, and nature of resources on NPS-managed lands. During the consultation process, the NPS will receive information from tribes as required by regulation that the tribes may consider sensitive or confidential (e.g., names of tribal members authorized to gather plants or plant parts in parks). During the consultations, the NPS will discuss ways to limit releasing such information to the extent permitted by applicable laws (e.g., using identifiers other than personal names for tribal designees).

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 June 11, 2026, we published in the *Federal Register* (91 FR 35550) 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 21, 2022. We did not receive any comments in response to that notice. In addition to the Federal Register Notice, we contacted four Parks and Tribes listed below to solicit comments from persons familiar with this collection of information in order to validate our time burden estimate and continued need for this collection. There is a general consensus amongst the four tribes on the existing time estimates provided to go through the Initial request, Agreements, and Appeals process.

Position	Affiliation
1. Acting Deputy Superintendent	Acadia National Park
2. -Supervisory Ecologist I&M	Great Smokies National Park
3. Chief of Science & Resource Management	Saguaro National Park
4. Superintendent	Buffalo National River
5. Land Management Specialist - Hawaii	Office of Hawaiian Affairs;
6. Agua Caliente Band of Cahuilla Indians:	Archaeologist
7. San Manuel Band of Mission Indians	Manager of Cultural Lands

Question 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.

Acadia National Park. In July 2024, NPS issued a Finding of No Significant Impact (FONSI) for the plant-gathering Environmental Assessment at Acadia, confirming that agreements under 36 CFR 2.6 must detail traditional uses, gatherers, methods, quantities, and monitoring to meet Organic Act and NEPA requirements. Over two years, ACAD has worked with the five federally recognized Tribes in Maine to gather this information, but some requirements—such as naming individual gatherers and annual reporting of locations and quantities—have been challenging. Tribes have raised concerns that these elements feel intrusive, create administrative burden, and conflict with cultural norms around protecting sensitive knowledge.

NPS Response: *We acknowledge that the information is unique to each agreement and that tribes may consider some of these details sensitive. However, certain information—including names and locations—can be protected under NHPA and ARPA. These confidentiality protections are discussed during consultation. Based on this comment, we*

will clearly explain confidentiality protections during agreement discussions to help alleviate tribal concerns about intrusiveness while ensuring regulatory requirements.

Buffalo National River. The information collection appears necessary to support the requirements of 36 CFR 2.6 and to allow the National Park Service to evaluate proposed tribal plant-gathering activities, assess potential impacts to park resources, and develop appropriate agreements. The information requested has practical utility because it provides the basis for determining traditional association, traditional use, resource protection measures, and agreement terms. No questions appear unnecessary, as each information element supports either eligibility determinations, environmental compliance, or administration of plant-gathering agreements

NPS Response: *No action required.*

Great Smoky Mountains National Park. Generally, we find the collection of information necessary for our efforts to protect the resource. All the questions are necessary.

NPS Response: No action required

Saguaro National Park. The 2016 rule requires tribes to submit written requests including three elements:

1. An explanation of the traditional association predating the park.
2. An explanation of the traditional purposes to which the gathering activity will relate.
3. A description of the gathering activity the tribe wants to conduct.

During consultation, between Tohono O'odham Nation and Saguaro NP, tribal council members verbally confirmed that their information is well-known and documented public knowledge and in that way the three requirements are covered. However, the face-to-face meeting and availability publicly information, was determined not to satisfy the rule's requirement to submit a written request confirming that the information was already known to NPS and had been discussed.

NPS Response. *Overall, respondents indicated that the requested information was necessary and reasonable for processing applications. However, in this case, the rigid requirements of this process had a negative impact on our relationship with the Tohono O'odham Nation, without adding value to the agreement. Although face-to-face consultations are impactful, the requirements for written request is a fundamental record for each applicant.*

Office of Hawaiian Affairs: Some Kanaka 'Ōiwi recognize the Hawaiian Kingdom as a sovereign nation under illegal occupation by the United States. I am one with this viewpoint. Therefore, how does the NPS expect to gather meaningful comments for a plant gathering policy when certain informants see DOI as an entity with no authority? The NPS should provide Kanaka Ōiwi with their traditional association to the 'āina (land) instead of Kanaka Ōiwi having to prove their traditional association to the park.

Agua Caliente Band of Cahuilla Indians: Regarding the process outlined for requesting to enter a plant gathering agreement (36 CFR § 2.6(c)), specifically relating to the requirement for "A brief description of the traditional purposes to which the gathering activity will relate," many tribes are weary of providing sacred or esoteric information due to colonial history.

San Manuel Band of Mission Indians: Tribes should not need to describe the specifics regarding traditional purposes related to plant gathering to NPS staff in order to enter into a

plant gathering agreement, as many Tribes prefer to keep this information confidential for a variety of reasons. The details of traditional cultural practices connected to plant gathering should not be the basis of decisions made by NPS staff to approve or deny an initiation into a plant gathering agreement.

NPS Response. *Due to the regulations the process for collecting information under the plant gathering regulations cannot be changed. Through consultation, understandings could be met.*

Question 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?*

Acadia National Park (ACAD): Working with five Tribal governments takes a lot of time because each Tribe has its own needs, traditions, and decision-making process. ACAD had to revise its agreement template after learning it didn't meet 36 CFR 2.6 requirements, which led to more conversations to clarify what information was needed. To keep things moving, ACAD focused on completing one agreement first—with the Houlton Band of Maliseet Indians—to use as an example for the others. The review process also takes longer because solicitor teams must check each agreement to make sure it follows all legal requirements.

NPS Response. *This iterative process reflects the individualized and unique nature of each agreement, where content cannot be duplicated from other sources or other Tribes. In this case. We acknowledge that while the consultation process may be lengthy and resource-intensive, the complexity reflects the unique, place-based requirements of each agreement and the need for consensus between Tribal governments and NPS managers. After the finalizing the agreement, the yearly agreement process is typically more streamlined.*

Buffalo National River: The estimated burden appears reasonable. The estimated 4 hours for an initial request, 80 hours for development of a gathering agreement, and 10 hours for an appeal generally reflect the level of coordination, consultation, documentation, and review required. Actual time may vary depending on the complexity of the proposed gathering activities, the number of plants involved, environmental compliance requirements, and the level of consultation needed between the tribe and the park.

Saguaro National Park: Saguaro NP was the first NPS unit to complete a plant harvest agreement and detailed implementation guidance had not yet been developed when we started. This lack of direction caused our process to stretch out longer than other NPS units that followed later. We worked intermittently with the authors of the rule over two years to address the rule's requirements and complete the agreement. Since completing this process eight years ago we have streamlined our paperwork as much as possible. Our MOU and SUP are renewed every five years, and we send an annual consultation letter to the tribe highlighting any emerging park issues (e.g. Africanized bees, invasive plants, etc.).

NPS Response. *No action required.*

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

Acadia National Park. The clarity and usefulness of plant-gathering agreements could be significantly enhanced by developing a more robust, nationally supported General Agreement template. ACAD's experience demonstrates that a well-developed template, aligned from the outset with legal requirements and best practices, would reduce confusion, support more efficient consultations, and set clear expectations for both Tribes and parks.

Buffalo National River. Providing optional templates or examples for initial requests and gathering agreements could improve consistency and help respondents understand the information needed. A checklist identifying required information elements and note who is responsible for each task may also improve completeness and reduce the need for follow-up requests. Additional examples of acceptable supporting documentation could further enhance clarity.

NPS Response: *Director's Policy Memo 24-01¹ provides the appropriate foundation for developing a standardized agreement template. The memo reflects national consultation led by the Office of Native American Affairs, insights from early plant-gathering agreements, and solicitor-reviewed drafts. Building on this work in a structured template would improve consistency across NPS units while preserving the flexibility needed to reflect each Tribe's traditional knowledge and practices. We agree this is a valuable suggestion. We will collaborate with regulatory authorities and seek solicitor concurrence to develop and refine a standardized template that supports both compliance and co-stewardship.*

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

Buffalo National River. The burden could be reduced by continuing to allow electronic submission of requests, supporting documents, and appeals. Standardized templates, fillable forms, and guidance documents would help respondents organize information efficiently and reduce preparation time. Standardized templates would also speed up the search for information since all documents would be formatted alike. Where appropriate, information previously submitted through existing consultation processes could be referenced rather than resubmitted, minimizing duplication of effort. Having a Categorical Exclusion (CE) category to utilize rather than an Environmental Assessment (EA) would minimize the burden on staff to complete compliance.

Saguaro National Park. To reduce administrative burden we specified that any tribal member is authorized to collect the specified plant parts without needing to contact the park. Additionally, our 5-year MOU and SUP timeframes have worked well to reduce annual paperwork required from the respondent. The park established the agreement that any tribal member could collect, this lessens the burden but still requires to get a special use permit. A few Tribal families are the primary participants of the agreement.

NPS Response: No action required.

¹ [Policy Memorandum 24-01: Guidance for Implementing 36 CFR 2.6—Plant Gathering by Federally Recognized Tribes for Traditional Purposes](#)

Federated Indians of Graton Rancheria: When a tribe is partnering with a NPS unit and using TEK to enhance health and vitality of the park's plant and animal communities, requiring an Environmental Assessment (EA) in order to issue a permit and establish an agreement to participate in traditional gathering of important plants and plant parts is overly burdensome and onerous.

San Manuel Band of Mission Indians: The existing requirements listed in the content of the NPS plant gathering agreement and its need to proceed through an Environmental Assessment (EA) and the documentation of a Finding of No Significant Impact (FONSI) is counter-intuitive to the foundation of the plant gathering agreement with a tribal community. The inherent activity of plant gathering emanates from a position of sustainability and minimal disturbance. The objective of traditional plant gathering is to promote the health and well-being of the plant communities that are utilized as resources. The requirement of an EA is not being considered in other government land-based agencies for the creation of tribal plant gathering agreements including the USFS or State Parks.

NPS Response – The Environmental Assessment is part of the ruling and policy and is required to have a Plant Gathering Agreement. Tribal partner working with the park site, can use plant species to address more than one EA.

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

We will not make 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.

The confidentiality of the information provided to NPS by the requesting Indian tribes is statutorily protected by the provisions of both the National Historic Preservation Act (54 USC 307103) and the Archaeological Resources Protection Act (16 U.S.C. 470hh).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not ask questions of a sensitive nature; however, some tribes may consider the names of tribal members authorized to gather plants or plant parts to be private or sensitive information. The regulation requires that a permit be issued under a plant gathering agreement and that the permit must identify the tribal members who are designated by the tribe to gather plants or plant parts under the permit (36 CFR 2.6(i)(xiii)).

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 30 annual responses totaling 530 annual burden hours. We estimate the dollar value of the burden hours is **\$35,198** (rounded). We used the Bureau of Labor Statistics (BLS) News Release USDL-26-0827², Employer Costs for Employee Compensation— March 2026, released on June 12, 2026, to calculate the total dollar value of annual burden hours. We used Table 3 to calculate employee compensation and costs for state and local government workers, by major occupational and industry group \$66.41 including benefits.

Table 12.1. Estimated dollar value of annual burden hours

Activity	Annual Number of Responses	Estimated Time per Response (hour)	Total Annual Burden Hours	Dollar Value of Burden Hour Including Benefits	Total Dollar Value of Annual Burden Hours*
Initial Request	20	4	80	\$66.41	5,313
Agreements	5	80	400	\$66.41	26,564
Appeals	5	10	50	\$66.41	3,321
TOTAL	30	94	530		\$35198

13. Provide an estimate of the total non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for

² <https://www.bls.gov/news.release/ecec.nr0.htm>

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, 2005, (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 annual non-hour cost burdens to respondents.

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 the total annual cost to the Federal Government for administering this information collection to be **\$123,697 (rounded)**. Hourly wage rates were derived from the Office of Personnel Management Salary Table 2026-DCB³. To account for benefits, we multiplied the hourly wage by 1.6, consistent with the previously mentioned BLS News Release USDL-26-0827.

For each request submitted by a federally recognized Indian tribe, we estimate that qualified staff at the GS-12/5 level will require the following amounts of time:

- **Initial Requests – 2 hours per request**

This includes reviewing the submission and preparing a background summary with recommendations for the National Park Service unit manager. (20 initial requests × 2 hours = **40 hours**)

- **Consultation and Agreement – 240 hours per consultation**

This includes conducting consultation with the requesting tribe, preparing a full background report and administrative record, drafting the agreement, and finalizing the agreement. (5 consultations × 240 hours = **1,200 hours**)

- **Appeals – 30 hours per appeal**

This includes reviewing the appeal request, consulting with the tribe, and preparing a report, administrative record, and decision document for action by the Regional Director. (5 appeals

³ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB_h.pdf

× 30 hours = **150 hours**)

Table 14.1 Total annual cost to the Federal Government

Requirement	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Total estimated staff time (hours)	Annual Cost*
Initial Request	12/5	\$55.62	\$88.99	40	\$3,560
Consultation and Agreement	12/5	\$55.62	\$88.99	1,200	\$106,788
Appeals	12/5	\$55.62	\$88.99	150	\$13,349
					139083

**Rounded*

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

There are no program changes to report at this time.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

We will not publish this information.

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

The OMB control number and expiration date appear on the Tribal Leaders Guide to the National Park Service Plant Gathering Regulation and that request return information from the respondent.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Elimination Act Submissions."

There are no exceptions to the certification statement.