

Comments to OMB Number: 0596-New.

March 2, 1017

<https://www.federalregister.gov/documents/2017/01/06/2017-00061/information-collection-significant-cave-nomination>

Raymond C. Keeler
President
Central Arizona Grotto and Arizona Region of the
National Speleological Society
NSS #23245
rckeeler@cox.net
623-523-1760

SUMMARY:

In accordance with the Paperwork Reduction Act of 1995, the Forest Service is seeking comments from all interested individuals and organizations on a new information collection, Significant Cave Nominations under the Federal Cave Resources Protection Act (FCRPA).

Title: Significant Cave Nomination.

OMB Number: 0596-New.

Expiration Date of Approval: Not applicable, new request.

Type of Request: New.

Abstract: The information covered in this request applies to caves on Federal lands administered by the Department of Agriculture, U.S. Forest Service. The U.S. Forest Service, in accordance with the FCRPA, collects information from appropriate private sector interests, including “cavers,” in order to update a list of significant caves that are under the jurisdiction of the agencies listed above. The U.S. Forest Service also processes requests for confidential information regarding significant caves. While the FCRPA does not define what “significant” means, it does require the Secretaries of Agriculture and Interior to issue regulations that define criteria for identification of significant caves. This criteria can be found at [36 CFR 290.3](#). This information enables the U.S. Forest Service to comply with the FCRPA ([16 U.S.C. 4301-4310](#)).

Estimate of Annual Burden per Response: 11 hours.

Type of Respondents: Individuals and Households.

Estimated Annual Number of Respondents: 10.

Estimated Annual Number of Responses per Respondent: One.

Estimated Total Annual Burden on Respondents: 110.

Respondent Comments:

Associated Respondent Burdens:

(1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the agency, including whether the information will have practical or scientific utility;

- **The collection of information is critical** to the management of the interconnected surface/subsurface relationships. This is a primary function of the agency.
- Practical use of significant cave information gathered should directly affect the area access, and surface management above the cave.
- There are several scientific disciplines associated. Subsurface water direction and movement, cave microbe communities identification, biota, archeology, paleontology.

(2) The accuracy of the agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

- It appears that the burden statement of an estimated 10 submissions at 11 hours each assumes all of the field work has been completed, is retrievable, and **only** filling out the form is being included. This number grossly under estimates the total time and resources necessary to acquire the information.
- The burden statement per response appears to be too large (11 hours) assuming this is for just filling out the form. A form taking 11 hours to fill out will be rejected by most. seems the annual burden is directed towards **new** responses. The 11 hour burden per response is too large. **It recommended an average of two hours burden to fill out each response** (the length of most major movies.)
- The total number of responses (10) is low. There has been a 20+ year lull since the last set of submissions.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

- An electronic, recoverable form would standardize the information received.
- **The form needs to be simple, straight forward and not too long.** This is not a research paper.
- The form needs the ability to include attachments (photos, maps, scans)
- Posting a couple of examples will be helpful.
- If a standardized form is used, this would be an excellent opportunity to resubmit currently accepted significant caves to get them into the standard form format.

(4) ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

- The respondents need a simple tracking mechanism for each submission. The submitter needs to be able to follow the progress from submission through to signing by the Forest Supervisor.
- The respondents need to be able to print the information submitted.
- The respondents need to be able to download a file of the information submitted so they do not have to retype the information.
- The respondents need to be able to modify the information as needed. For example, unclear statements can be modified and additional information can be added.

Associated USFS burdens that need to correspond to the Responses. This is not the Federal Register request but is closely related. There is some overlap from the above, but the perspective is from the USFS view.

(1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the agency, including whether the information will have practical or scientific utility;

- **The collection of information is critical** to the management of the interconnected surface/subsurface relationships. This is a primary function of the agency.
- Practical use of significant cave information gathered should directly affect the area access, and surface management above the cave.
- There are several scientific disciplines associated. Subsurface water direction and movement is one example. Cave microbe communities are another example.

(2) The accuracy of the agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

- The burden statement does not state if the estimated 10 submissions at 11 hours each are by District, Forest, Region, or National. If the submissions are a national annual total, the number will be low due to the improved reporting form being implemented, and the associated visibility. If the number is by Forest, the numbers will vary widely from zero to many. Let us assume the intent is the national form is used, and the information is forwarded to individual Forests. The problem arises when there is no one available at the Forest level to process the submission. See the next bullet.
- The burden statement appears to be incomplete. It seems the annual burden is directed towards **new** responses. However, there is an annual burden that is needed to address management of previous years of nominations. The 11 hour burden per response appears too small. It does not include local field confirmation, or equipment or vehicles. Is this number intended to include review time by the Forest/District officer for each FCRPA category included for significance? Does this include Supervisor review time and signing?
- The total number of responses (10) is low. There has been a 20+ year lull since the last set of submissions.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

- Here is an area where huge improvements can be made. From the Forests I have talked with, each Forest is creating their own GIS cave layer for data management, if it has been done at all over the last 20+ years. Further, there is little desire to implement a cave GIS layer by the Forest GIS person who already has too many items on his/her plate. If a cave GIS template were created at a national level that could be implemented at the Forest level then the reluctance to implement would go down and the information quality would go up.
- The issue is for those forests with a current cave GIS layer needing to convert to a standardized format.
- If the standardized GIS layer can be modified as needed at a regional level, it will allow for regional/forest variations.
- If the standardized form has exportable fields to a cave a standardized GIS layer, there will be a huge USFS savings at the Forest and District levels. Much of their background work will already be included. For example, Environmental Assessment preparation.

(4) ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

- There needs to be a simple tracking mechanism for submissions. The submitter needs to be able to follow the progress of the submission through to the signing by the Forest Supervisor.
- The responsible Forest officer needs to be able to print the information submitted.
- The responsible Forest officer needs to be able to download a file of the information submitted.
- The responsible Forest officer needs to be able to modify that information.