

**SUPPORTING STATEMENT
MANAGEMENT AND OVERSIGHT OF THE NATIONAL
ESTUARINE RESEARCH RESERVE SYSTEM**

OMB CONTROL NO. 0648-0121

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

Section 315 of the Coastal Zone Management Act ([CZMA](#)) of 1972 (16 U.S.C. §451), 16 U.S.C. §1461, establishes the National Estuarine Research Reserve System (NERRS). The NERRS consists of carefully selected estuarine areas of the United States that are designated, preserved, and managed for research and educational purposes. The Reserves are chosen to reflect regional differences and to include a variety of ecosystem types according to the classification scheme of the national program as presented in [15 CFR Part 921](#). As part of a national system, the Reserves collectively provide a unique opportunity to address research questions and estuarine management issues of national significance. The reserves also serve to enhance public awareness and understanding of estuarine areas and provide suitable opportunities for public education and interpretation. Regulations provide guidance for delineating reserve boundaries and additional guidance for arriving at the most effective and least costly approach to establishing adequate state control of key land and water areas. Any qualified public or private persons, organization or institutions may compete for research funding to work in research Reserves. In fact, applicants are almost always states.

Subsection 315(e)(1)(B) of the CZM Act authorizes the Estuarine Reserves Division (ERD) of the Office of Ocean and Coastal Resource Management (OCRM) to make grants or cooperative agreements to any coastal state or public or private institution or person for purposes of supporting research within the NERRS. This program is listed in the Catalog of Federal Domestic Assistance under "Coastal Zone Management Estuarine Research Reserve, Number 11.420". Applications for such grants follow the provisions of OMB Circular A-102. Applications for research grants are required so that ERD can determine which projects best support the NERRS program and merit funding.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

There are several types of reporting requirements relating to this program:

1. Applications (SF 424s and supporting documentation required by OMB Circulars A-102 and A-110) are required by NOAA to determine if the proposal for funding meets the

standards of the Act and implementing regulations, applicable OMB Circulars (most frequently, A-102 Revised, A-110, and A-87), and other applicable laws and regulations.

Additional specific information is required depending upon the type of action or award requested.

2. Applications for research awards should contain the names of the potential evaluators. State requests to approve proposed sites must contain the information detailed at 15 CFR 921.11. The information is necessary to ensure that the site meets national standards and requirements for a reserve, to obtain a complete description of the area being proposed, to ensure that the best available site was chosen, and to ensure proper participation by the public and state's Governor.

3. After site selection, states may obtain funds for developing a management plan and the data necessary to prepare an environmental impact statement. The requirements are described at 15 CFR 921.13. The management plan is a detailed document that the state uses to establish NOAA-approved goals and objectives for the reserve and as a framework to guide decisions faced in establishing and managing a reserve. The plan must describe the reserve's goals and contain plans for the research and education programs for the reserve, as well as a public access plan. The state must revise the management plan at least every five years, or more often if necessary. This information is needed to ensure that the reserve will meet the objectives the law established for reserves. A resources protection plan is needed to ensure that the resources will continue to be appropriate for conducting the types of research envisaged.

The management plan must also contain plans for any proposed construction and for the acquisition of land and water areas. NOAA must ensure that any construction on the reserve for which Federal funds provide support, are appropriate for the objectives of a reserve. Funding is not to be used, for instance, to build bath houses or other recreational facilities. The acquisition plan is necessary to ensure that the areas being obtained are appropriate and needed for a reserve and that costs are minimized (for instance by obtaining conservation easements instead of purchasing borderlands). The state is not supposed to use the funds to obtain land for other unrelated purposes or purchase greater amounts of land than necessary to achieve the reserve's purpose.

The state must also submit the data necessary for NOAA to prepare an Environmental Impact Statement. Since the state has to gather much of this information or similar information for other purposes, it can obtain it more efficiently than NOAA can. The state also receives Federal funds to do this.

4. According to the 15 CFR Subpart I, section 921.60 (1) and (2), monitoring funds are used to support major phases of a monitoring program: (1) studies necessary to collect data for a comprehensive site description/characterization; and (2) development of a site profile. The site profile is a synthesis of information gathered during Phase I, the Environmental Characterization Phase, which is conducted as a combination of literature and field (optional)

research that provides an overall picture of the Reserve in terms of its resources, issues, management constraints, and research needs. The site profile will help Reserve management find important information gaps in the resources and identify the aspects of monitoring to be initiated during a later monitoring phase (resource monitoring).

5. Applications for acquisition and development awards must include a categorical exclusion check list, Certification of Federal Consistency, state Historical Preservation Office comments, and a preliminary engineering report if the award involves construction projects or restorative activities involving construction.. Before the funds for construction are expended, the categorical exclusion checklist, which is a part of the grant application package for construction and development projects, is submitted to OCRM for approval. The Certification of Federal Consistency, which is also a part of the grant application package for construction and development projects, is a notice signed by an authorized official, such as the coastal program manager or designee from the state coastal management program office indicating that the construction and/or development project is consistent with the goals and policies of the state's coastal management program. This document is submitted as part of the categorical exclusion checklist. The National Historic Preservation Act requires that NOAA obtain the state comments to ensure the Federal government is not funding a project that will harm a site of historical significance. Grant laws and rule require the engineering report so that reviewers can determine that the applicant knows how to perform the requested construction.

6. In addition, although the NERRS regulations do not specifically require the states to submit annual reports/work plans, the Estuarine Reserves Division (ERD) encourages the states to submit these documents to help ensure that national standards are still being met after the reserves' eligibility for Federal operation and management funds have expired (Section 921.40(e)).

As explained in the preceding paragraphs, the information gathered has utility. NOAA will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response #10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Extensive effort has been made to establish OCRM on an electronic system for grant

applications and reports. The electronic system that has been developed is called [Coastal and Marine Management Program \(CAMMP\)](#). The CAMMP now facilitates the collection, access, analysis, and dissemination of coastal grant operations data and information at a national level. CAMMP is intended to improve the national and state resource management capabilities of the NERRs. The CAMMP streamlines the application process, improves state and federal data collection and analysis capabilities, serves as a national database for related information on NERR programs and improves accessibility to coastal resource information. All NERRs are using the CAMMP Grant Application and Reporting System.

The NERRs began using the internet for their grant applications in March 2000 and now use the grants.gov and grants online internet systems to submit their grant applications and amendments.

4. Describe efforts to identify duplication.

NOAA is the only agency funding the CAMMP system; we are not aware of any similar information being gathered. No similar information is available.

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

The information collection primarily involves state agencies, with a few (if any) small entities involved each year for research grants. We do provide technical assistance in preparing responses, and this reduces the burden.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Applications are filed when the applicant requests funds, so this cannot be conducted less frequently. If it was not conducted at all, no awards could be given.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is consistent with OMB Guidelines for Information collections.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A Federal Register Notice solicited public comment on this collection. No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents are made.

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

No assurance of confidentiality is provided.

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.

No sensitive questions are asked.

12. Provide an estimate in hours of the burden of the collection of information.

There are currently 20 states and one territory involved in this program, and 27 sites. It is anticipated that two new sites will be approved for designation, bringing the total respondent number to 29. States may have more than one site, and sites may have more than one grant at a time. The routine funding requests are not NOAA burden, since they utilize the SF-424 and the requirements of OMB Circular A-102.

Based on an estimated 29 grantees and 29 annual responses as detailed below, the estimated annual burden is 18,040 hours:

- Five management plans are received per year. Most include special acquisition and development information. The burden is five plans x 2,000 hours per plan = 10,000 hours.
- Two site nomination documents for newly proposed NERRS sites. The burden is two documents x 2000 hours/report = 4,000 hours.
- Two site profile documents for selected NERRS sites. The burden is two documents x 2000 hours/report = 4,000 hours.
- Five annual reports/work plans are received per year. Current burden is estimated as 5 x 5 hours/report = 25 hours.
- Fifteen applications are expected that will require the categorical exclusion checklist, state Historic Preservation Office comments, a preliminary engineering report for construction projects or restorative activities involving construction, and the Federal Consistency Certification: 15 applications x 1 hr = 15 hrs.

Respondent costs are estimated to be \$541,200 based on a pay rate of \$30/hour.

Site profiles have been added to this collection. This effort is minimized due to computer and email capability. We reduced the total burden of annual reports/work plan from 75 hours to 25 hours due to computer and email capabilities. We reduced the individual burden for the grant applications from 2 hours to 1 hour due to the use of the grants.gov, the grants online system, and the CAMMP system. The hourly wage has been increased from \$27 to \$30 to reflect more current pay rate for people working on the responses. As a result, the overall cost estimated increased due to the hourly rate increase and the inclusion of the site profiles documents.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

Costs are as follows:

- Five management plans x 350 pages per document x 30 document copies for distribution = 52,500 total pages x \$0.10 copying cost per page = \$5,250, plus \$4.30 mailing cost per document x 150 total copies = \$645. The total cost for management plans is \$5,895.
- Two site nomination documents x 350 pages per document x 100 document copies for distribution = 70,000 total pages x \$0.10 copying cost per page = \$7,000, plus \$4.30 mailing cost per copy x 200 total copies = \$860. The total cost for site nomination documents is \$7,860.
- Two site profiles x 200 pages per document x 10 documents for distribution = 4,000 total pages x \$0.10 copying cost per page = \$400, plus \$4.30 mailing cost per document x 20 total documents = \$86. The total cost for site profiles is \$486.
- Fifteen applications x 20 = 300 total pages x \$0.10 copying cost per page = \$30, plus \$2.50 mailing cost per document x 15 applications = \$37.50. The total cost for applications is \$67.50.

Total annual costs are \$14,309.

14. Provide estimates of annualized cost to the Federal government.

The annual Federal cost associated with collecting, processing, and analyzing the information is about \$85,000. This cost is obtained from estimating personnel time and associated overhead costs.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

With the ability to provide management plans through email and computer disks, the distribution of paper copies can now be reduced to an estimated 30 documents per management plan. This results in a savings of 65 hours and \$16,177.

Site profile documents have been added to this collection, with a total burden of 4,000 hours, and cost of \$486.

There is a net burden increase of 3,935 hours and a net cost decrease of \$15,691.

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results will not be published.

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

The expiration date for OMB approval will be displayed.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.