

BRIDGE PERMIT APPLICATION GUIDE
Supporting Statement
For
1625-0015

A. JUSTIFICATION

1. Circumstances which make the collection of information necessary.

Under the provisions of 33 U.S.C. 401, 491, and 525, it shall not be lawful to construct a bridge or causeway over navigable waters of the United States unless the plans and location of such structures have been approved by the Secretary of Homeland Security through the Commandant, U. S. Coast Guard. The plans and map of the location must be in such detail as may be required for a full understanding of the bridge project. The procedures of obtaining an individual bridge permit are set forth in 33 CFR 115.50 and 115.60. The procedure essentially calls for a letter of application with letter size drawings (plans) and map showing the proposed bridge project and its location.

Section 102(2)(C) of the National Environmental Policy Act of 1969, as amended, requires federal agencies to assess in detail the environmental impacts of proposed major federal actions on the quality of the human environment. 40 CFR 1500-1508 sets forth the procedures, and 40 CFR 1502.3 specifically mandates the requirement for impact statements.

2. Purpose of the Information Collection

The Coast Guard, before a bridge permit is issued or denied, uses this information to evaluate the effect an applicant's bridge project will have on the reasonable needs of navigation and on the human environment.

3. Consideration of the use of improved information technology to reduce the burden.

Use of information technology has been found not particularly useful in obtaining the required information which is unique to the Bridge Permits program. Development of the Bridge Permit Application Guide (BPAG) and the Bridge Administration Manual (BAM) have prevented waste within the Coast Guard. The BPAG provides a standard for assisting applicants in compiling the required information and documents; the BAM provides the same standard for Coast Guard field units and Headquarters to review and evaluate permit applications.

4. Efforts to identify duplication.

The application for a bridge permit is a unique collection of information; essentially, there is no duplication. The procedures for developing environmental assessments or impact statements (40 CFR 1506) requires that duplicative efforts be eliminated between federal, state and local governments. Thus, where practicable, joint public meetings or hearings are held, joint public notices can be issued, and environmental documents/statements, reports, and analyses can be referenced and/or adopted.

The applicant is the sole source of the information on a proposed bridge location and plans submitted for Coast Guard approval. Similar information is not available from other sources. Further, the law requires bridge builders to submit bridge location and plans for approval.

5. Methods used to minimize the burdens to small business.

The respondents are, with few exceptions, Federal, state, or local government agencies, or organizations employing more than 100 persons.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

The result would be noncompliance with statutory and regulatory requirements, and the bridge permit program would be ineffective. Less frequent collection [than on the occasion] would result in the Coast Guard's inability to make informed decisions on whether proposed bridges or bridge modifications would meet the reasonable needs of navigation with due consideration of the effects on the human environment.

7. Special circumstances that require collection to be conducted in an inconsistent manner.

This information collection is consistent with the guidelines found in 33 U.S.C. 401, 491, and 525.

8. Solicitation of Comments.

A 60 day Notice was published in the Federal Register to obtain public comment on this collection. (See [USCG-2008-0204], April 8, 2008, 73 FR 19085). The USCG has not received any comments on this information collection.

9. Provide any payment or gift to respondents.

No payment or gift to respondents.

10. Assurances of confidentiality provided to respondents.

No assurances of confidentiality are expressly provided to respondents. Bridge permit case records are public records and subject to applicable provisions of Title 49 Code of Federal Regulations Part 7, Public Availability of Information Transportation (49 CFR 7).

11. Additional justification for any questions of a sensitive nature.

No questions of a sensitive nature are included in this information collection.

12. Estimate of annual hour and cost burden.

Number of Respondents:

Frequency of Response: Usually once, when applying for Coast Guard approval of proposed bridge construction or bridge modification.

No. of Respondents/Bridge Permit Applicants:

FY 08 - 65 (estimated)

FY 07 -- 67; FY 06 -- 62; FY 05 -- 65

Hours per response: 51 hours

Total burden hours: (FY 08) 65 X 51 = 3315

Difference: FY 05 -- 56 respondents; 2240 TB hrs

Respondent cost to provide the information contained in the Bridge Permit Application Guide [enabling the Coast Guard to perform its statutory duty regarding the bridge permit program functions] is \$3,627.00 per application. Calculations and derivations are also contained below. These costs are also based upon the schedule of hourly rates for personnel contained in enclosure (2) to COMDTINST 7310.1I. Total estimated annual respondent cost is the number of applications received per year times the respondent cost per application or 65 X \$3,627 = \$235,755.00.

Within government (I/G)

Outside government (O/G)

Pre-application consultations w/federal, state, local govt. (GS-13/14, O/G \$81) X 12 hrs	=	\$972.00
Application preparation (GS-13/14, O/G \$81) X 25 hrs	=	\$2025.00
Clerical (GS-5/8, O/G \$40) X 4 hrs	=	\$160.00
Drawings prepared (GS-9, O/G \$43) X 10 hrs	=	\$430.00
Copying, postage and handling	=	<u>\$40.00</u>
Respondent burden hours - 40/financial burden per application	=	\$3,627.00
Total Respondent Cost (\$3,627 X 65 applicants)		

(FY08 est.) = \$235,755.00

13. Provide an estimate of the annualized capital/start-up costs to respondents.

There are no annualized capital and start-up costs.

14. Estimates of annualized cost to the Federal Government.

The estimated annual federal cost for administration is \$3,337.50 per application or 65 X \$3,337.50 = \$216,937.50. This estimate is primarily federal personnel salary and overhead costs associated with field and headquarters time expended in processing a respondent's application for a bridge permit or permit amendment. The costs are directly related to working with and evaluating the information collected from respondents in order to make the federal decision required on bridge project impacts on navigation and on the human environment. Personnel costs are calculated from information in enclosure (2) to COMDTINST 7310.1I.

District review of application package

(GM-12/13/14, O/G \$81) X 4 hrs = \$324.00

CG acknowledgment

(GS-12, I/G \$57) X 30 min = \$28.50

(GS-5, I/G \$29) X 1 hr = \$29.00

CG Public Notice prepared

(GS-12, I/G \$57) X 2 hrs = \$114.00

(GS-5, I/G \$29) X 2 hrs = \$58.00

Evaluate responses to PN, evaluate project impacts on navigation and the environment, prepare Findings of Fact, environmental documents other than EIS and transmittal letters for final HQ action.

(GS-13/14, I/G \$77) X 2 hrs = \$154.00

(GS-12, I/G \$57) X 12 hrs = \$684.00

(GS-5, I/G \$29) X 3 hrs = \$87.00

HQ receives application package, evaluates impacts on navigation and the environment, prepares written evaluations, bridge permit or denial, and transmittal letter to District

(GS-15, I/G \$90) X 2 hrs	=	\$180.00
(GS-13, I/G \$66) X 25 hrs	=	\$1650.00
(GS-5, I/G \$29) X 1 hrs	=	\$29.00

Federal government burden hours - 49.5

Federal government financial burden - \$3,337.50 application

Total Federal Cost (\$3,337.50 X 65 applications) (FY 08 est.) = \$216,937.50

15. Reason for changes or adjustments in the burden.

Total public burden hours of the Bridge Permit Program was an *estimated* 2240 in FY 05. *Actual* public burden hours for FY 05 was 2600, an increase of 360 burden hours. Hours per response was adjusted from 40 to 51, an increase of 11 hours per response. Changes in burden are due normally to the number of bridge permit applications received, increased complexity of bridge projects and their impacts on the environment, as well as increases in the complexity of environmental laws. Depending upon the foregoing, future public burden hours may remain the same, increase or decrease.

16. Plans for tabulation, statistical analysis and publication.

There are no plans to use statistical analysis or to publish this information.

17. Approval for not to explain the OMB expiration date.

We are not seeking such approval. The OMB Number will appear on appropriate PRA disclosure information.

18. Exception to the certification statement.

There are no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.