

**SUPPORTING STATEMENT
MANAGEMENT AND OVERSIGHT OF THE NATIONAL
ESTUARINE RESEARCH RESERVE SYSTEM
OMB CONTROL NO. 0648-0212**

A. JUSTIFICATION

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

This request is for a renewal of the information collection.

The National Estuarine Research Reserve System (NERRS) is a partnership between OCRM and 21 states and Puerto Rico that protects more than 1.3 million coastal and estuarine acres in 27 reserves for long-term research, monitoring, education, and stewardship, established under Section 315 of the Coastal Zone Management Act ([CZMA](#)) of 1972 (16 U.S.C. 1451), 16 U.S.C. 1461. 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, organizations 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 CZMA 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. Those documents submitted include: 1) site designation (nomination) materials including associated National

Environmental Policy Act (NEPA) requirements, 2) management plans, 3) site profiles which are ecological characterizations of the reserve, and 4) supporting materials for construction and land acquisition awards which also include associated NEPA requirements.

1) Requests by states 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.

A coastal state may apply for financial assistance for the purpose of site selection, preparation of a management plan and environmental impact statement, and for conducting limited characterization studies. The requirements are described at 15 CFR 921.13. The management plan is a detailed document outlining goals, objectives and strategies for the reserve and serves as a framework for establishing and managing a reserve. The plan must contain sub-plans for administration, research, education, public access, construction, land acquisition and resource protection to ensure the appropriate use and protection of reserve resources. This information is needed to ensure that the reserve will meet the objectives the law established for reserves.

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 efficiently. The state also receives Federal funds to provide this information.

2) While an Environmental Impact Statement and a management plan are required documents for designation, it is also required that management plans be revised every five years 921.33(c). As stated above, management plans outline the major goals, objectives and strategies that the reserve will undertake in a five year period and contains plans for administration, research, education, public access, construction, land acquisition and resource protection. The management plan provides a vision and framework to guide reserve activities during the five year period, enables the reserves and NOAA to track progress and realize opportunities for growth, guides program evaluations under Section 312 of the Coastal Zone Management Act, and enables the reserves to acquire facilities construction and land acquisition funds.

3) 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).

4) States apply for Federal funds to assist the state in operation and management of the reserve including the management of research, monitoring, education and interpretive programs (15 CFR 921.32) 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. Applications for acquisition and development awards must include a categorical exclusion check list, Certification of Federal Consistency, and state Historical Preservation Office comments. 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 [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.

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 to Question 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. The federal government now uses grants.gov to obtain competitive and non-competitive award applications. Within NOAA's Office of Ocean and Coastal Resource Management, an electronic system called [Coastal and Marine Management Program \(CAMMP\)](#) assists the applicant in creating the narrative and associated budget portions of the award application. CAMMP serves to facilitate the collection, access, analysis, and dissemination of coastal grant operations data and information at a national level and alleviates the need for paper copies or other programs to create award applications. 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. Upon receipt of an award, NOAA recipients use the NOAA Grants Online System to submit progress reports, financial reports and post-award actions deleting the need for paper submissions. The entire grant award process is accomplished electronically.

4. Describe efforts to identify duplication.

NOAA's Office of Ocean and Coastal Resource Management is the only agency using the CAMMP system for composing award narratives; there are no duplicative systems to gather this information.

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.

If this information were not collected, there would not be a natural estuarine reserve system, supported by management and awards by the Federal Government.

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

More than two copies of some documents are required, for distribution to reviewers.

8. Provide information on 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 published on April 28, 2010 (75 FR 22368) 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.

It is anticipated that two new sites will be approved for designation within the next five years, 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.

Based on an estimated 29 grantees and 20.34 annual responses (rounded up to 21 in ROCIS) as detailed below, the estimated annual burden is 10,682 hours:

- Four management plans are received per year. Most include special acquisition and development information. The burden is four plans x 2,000 hours per plan = 8,000 hours.
- One site nomination document for a newly proposed NERRS site. This will likely only occur once every three years. The burden is one document x 2000 hours/report; 2,000 hours/3 years = 667 hours.
- One site profile document for a selected NERRS site per year. There are only 4 reserves that need to complete this requirement. The burden is one document x 2000 hours/report = 2,000 hours. It is estimated that one site profile will be submitted per year, until all reserves have completed this requirement.
- Fifteen applications are expected that will require the categorical exclusion checklist and state Historic Preservation Office comments: 15 applications x 1 hr = 15 hrs.

Respondent costs are estimated to be \$360,450 based on a pay rate of \$30/hour.

Reserves submit a revised management plan every five years. Given the number of reserves with updated plans and the time schedule to accommodate future plan updates, the number of plans reviewed per year has been reduced to four. There is likely to be none or one site nomination document submitted during this period given that the system has covered many of the biogeographic regions outlined within the regulations (15 CFR 921 Appendix I). Site profiles have been reduced to one, given that most reserves, with the exception of four, have completed this task. The annual report requirement is no longer in place and hence has been removed from this submission. These changes resulted in fewer burden hours and reduced respondent costs.

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 Question 12 above).

Costs are as follows:

Four management plans x 200 pages per document x 10 document copies for distribution = 8,000 total pages x \$0.10 copying cost per page = \$800, plus \$4.30 mailing cost per document x 40 total copies = \$172. The total cost for management plans is \$972.

One site profile x 200 pages per document x 10 documents for distribution = 2,000 total pages x \$0.10 copying cost per page = \$200, plus \$4.30 mailing cost per document x 10 total documents = \$43. The total cost for site profiles is \$243.

Total annual costs are \$1,215. The other items can be submitted electronically and/or copies are made by the federal government.

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.

Adjustments:

Reserves submit a revised management plan every five years. Given the number of reserves with updated plans and the time schedule to accommodate future plan updates, the number of plans reviewed per year has been reduced to four. With the ability to provide management plans, site profiles and supplementary award information electronically, the production and distribution of paper copies has been reduced.

There is likely to be none or one site nomination document submitted during this period given that the system has covered many of the biogeographic regions outlined within the regulations (15 CFR 921 Appendix I). Site nomination documents are reproduced by the federal government, alleviating the need for the respondent to produce copies.

Site profiles have been reduced to one, given that most reserves, with the exception of four, have completed this task. Additionally, the annual report required in addition to standard award reporting is no longer in place and hence has been removed from this submission. These changes resulted in fewer burden hours and reduced respondent costs by 6,025 hours and \$12,894 respectively.

Program changes:

The annual reports are no longer covered under the PRA requirement as they are now required in the standardized format; that is, covered by one of the standard grant documents. Copying charges have been eliminated for some submissions, as the government now makes the copies for distribution. Postage charges have been eliminated for the same programs, as there is now an electronic submission option.

Net burden adjustment: 5,331. Net cost adjustment: \$9,105.

Net burden program change: 2,207. Net cost program change: \$3,989.

NOTE These figures are distributed differently between “program change” and “adjustment” in ROCIS, as previously, we had done separate nonprofit and government ICs for applications and management plans, but as there is now only one estimated management plan per year, one of those two ICs had to be removed. To be consistent, we removed the separate applications IC as well.

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.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.