

October 18, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660-NEW

**Title: Environmental and Historic Preservation Environmental
Screening Form**

Form Number(s): FEMA Form 024-0-1

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked “Yes”, Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

The National Environmental Policy Act (NEPA) (Public Law 91-190, Sec. 102 (B) and (C) 42 USC § 4332) requires that the Federal government examine the impact of its actions on the environment, look at potential alternatives to that action, inform both decision-makers and the public of those impacts through a transparent process, and pursue mitigation if necessary. Environmental and Historic Preservation (EHP) compliance refers to the process by which the Federal Government ensures that projects financed through Federal grant funding are compliant with NEPA and existing laws and regulations related to environment and historic preservation. Compliance under the National Environmental Policy Act is required whenever Federal funds are expended as listed in Sec. 102(D) of the National Environmental Policy Act (42 U.S.C. § 4332(D)).

A NEPA compliance review process for FEMA grant programs incorporates compliance with Section 106 of the National Historic Preservation Act (NHPA) (Public Law 102-575, 16 U.S.C. § 470f) which requires that a Federal official, having jurisdiction over awarding of Federal funds, will have to take into consideration the effect that the actions undertaken as a result of the awarded funds have on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

The Environmental and Historic Preservation Environmental Screening Form is a paper form used by FEMA's Grant Programs Directorate (GPD) and is utilized when following the requirements for grant packages that utilize this instrument. This form should be attached to all project information sent to the Grant Programs Directorate for an Environmental and Historic Preservation (EHP) regulatory compliance review.

Project information requested on the Environmental Screening Form, such as the total extent of ground disturbing activities, the ages of surrounding buildings, the height of communication towers and antennae, and whether or not equipment would need to be installed will enable FEMA/GPD to conduct a legally sufficient review of potential impacts to the natural and built environment. Furthermore, appropriate visual documentation in the form of color site photographs and maps, as requested in the Environmental Screening Form, help to further illustrate site conditions to determine whether impacts could occur.

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.

The information provided on the Environmental and Historic Preservation Environmental Screening Form requires grant recipients to submit their completed forms electronically via the Centralized Scheduling and Information Desk (CSID). CSID is an email address (askcsid@dhs.gov) for the office that serves as the single point of entry for GPD.

Grantees are asked to send materials electronically to this address, at which point their project information is sent to the GPD EHP team for review. CSID is a comprehensive coordination, management, information, and scheduling tool developed by GPD for homeland security terrorism preparedness activities.

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.

This information is not collected in any form, and therefore is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

This information collection does not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

FEMA Grant Programs Directorate has determined this information necessary to collect. Failure to collect it would result in every grant programs being non-compliant with the National Environmental Policy Act (NEPA) and other regulatory requirements. Additionally, it could result in the de-obligation of funds awarded to grantees.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

(b) Requiring respondents to submit more than an original and two copies of any document.

(c) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

(d) 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.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) 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.

(h) Requiring respondents to submit proprietary trade secret, 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.

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on March 23, 2010, Volume 75, No. 55, pp. 13772. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on July 1, 2010, Vol. 75, Number 126, pp. 38113. No comments were received. See attached copy of the published notice included in this package.

b. 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.

There are no recent 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, and on the data elements to be recorded, disclosed, or reported regarding the use of this form.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may

preclude consultation in a specific situation. These circumstances should be explained.

There are no recent consultations with representatives of those from whom information is to be obtained or those who must compile records.

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

There are no payments or gifts to respondents for this data collection.

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

The DHS Privacy Office approved the Privacy Impact Assessment (PIA) for this information collection on July 14, 2009. A System of Records Notice (SORN) was published on August 7, 2009, (Volume 74, Number 151, Pages 39705-39708).

11. Provide additional justification for any question 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.

There are no questions of a sensitive nature required in this data collection.

12. Provide estimates of the hour burden of the collection of information. The statement should:

EHP Environmental Screening Form - This collection activity involves requesting information such as the total extent of ground disturbing activities, the age of existing and surrounding buildings, the height of communication towers and antennae, and whether equipment being installed will enable GPD to conduct a legally sufficient review of potential impacts to the natural and built environment. Additionally, appropriate visual documentation in the form of color site photographs (ground-level and aerial), as requested in the Environmental Screening Form, assist in illustrating the site conditions to determine the potential impacts.

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). 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 desired. 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.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Table A.12: Estimated Annualized Burden Hours and Costs							
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, Local or Tribal Government	Environmental and Historic Preservation Environmental Screening Form/ FEMA Form 024-0-1	842	1	8 hours	6,736 hours	\$36.15	\$243,506.40
Business or other for-profit	Environmental and Historic Preservation Environmental Screening Form/ FEMA Form 024-0-1	481	1	8 hours	3,848 hours	\$27.01	\$103,934.48
Total		1,323			10,584 hours		\$347,440.88

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for State, Local or Tribal Government employees is estimated to be \$36.15 per hour, which reflects a 1.4 multiplier. The wage rate category for Business or other for profit employees is estimated to be \$27.01 per hour, which reflects a 1.4 multiplier as well, therefore, the estimated burden hour cost to respondents is estimated to be \$347,440.88 annually.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost

burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. 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.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, ect.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
Total				

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The total cost to FEMA is \$177,422.08. Approximately 1 staff member with an estimated grade level of GS-13 review and analyze the information collected for this collection.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Describe] There is one contract that supports this effort. The contract is the Grant Programs Directorate (GPD) Environmental and Historic Preservation (EHP) Support Contract. This contract provides technical support to the GPD EHP compliance program; activities include daily program support through on-site contract staff engaged in the tracking and review of EHP materials	\$150,000.00

provided for grant-funded projects that results in a compliance recommendation supplied to the GPD EHP Liaison. The contract also supports technical assistance and training to grantees on issues of compliance with environmental and historic preservation laws and Executive Orders (EOs). The total cost of this contract is: \$150,000.00	
Staff Salaries [1 GS-13, step 4 employee spending approximately 20% of time annually to provide guidance/assistance to grantees, tracking & reviewing information for this data collection.] $1 \times \$97,936.00 = \$97,936.00 \times 1.4 = \$137,110.40 \times .20 = \$27,422.08$	\$27,422.08
Facilities [cost for renting, overhead, ect. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
Total	\$177,422.08

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

*A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

*A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).*

*"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.*

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
Environmental and Historic Preservation Environmental Screening Form/ FEMA Form 024-0-1	0	10,584 hours	+10,584 hours			
Total(s)	0	10,584 hours	+ 10,584 hours			

***Explain:** This is a new collection that was not previously on the OMB inventory. Therefore, the burden hours are positive program changes.*

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
Environmental and Historic Preservation Environmental Screening Form/ FEMA Form 024-0-1	0	+\$347,440.88	\$347,440.88			
Total(s)	0	+\$347,440.88	\$347,440.88			

***Explain:** This is a new collection that was not previously on the OMB inventory. Therefore, the burden hours are positive program changes.*

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.

FEMA does not intend to employ the use of statistics or the publication thereof for this information collection.

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

FEMA will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

There is no statistical methodology involved in this collection.