Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0016

Title: Revision to National Flood Insurance Program Maps: Application Forms for LOMRs and CLOMRs

Form Number(s): FEMA Form 086-0-27 (formerly 81-89), 086-0-27A (formerly 81-89A), 086-0-27B (formerly 81-89B), 086-0-27C (formerly 81-89C), 086-0-27D (formerly 81-89D), and 086-0-27E (formerly 81-89E)

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 Code of Federal Regulations (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 Office of Management and Budget (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 Flood Insurance Program (NFIP) is authorized by 42 U.S.C. 4001 et seq. (Public Law 90-448 (1968) and expanded by Public Law 93-234 (1973)). The Department of Homeland Security's Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) and maintains the maps that depict flood hazard information. In 44 CFR Part 65.3, communities are required to submit technical information concerning flood hazards and plans to avoid

potential flood hazards when physical changes occur. In 44 CFR Part 65.4, communities are provided the right to submit technical information when inconsistencies on maps are identified. In order to revise the Base (l-percent annual chance) Flood Elevations (BFEs), Special Flood Hazard Areas (SFHAs), and floodways presented on the NFIP maps, a community must submit scientific or technical data demonstrating the need for a revision. The NFIP regulations cited in 44 CFR Part 65 outline the data that must be submitted for these requests. This collection serves to provide a standard format for the general information requirements outlined in the NFIP regulations, and helps establish an organized package of the data needed to revise NFIP maps. This collection helps to:

- Ensure all data required to process these requests is received with the initial submittal
- Ensure processing consistency among all requests
- Ensure that submitted data are presented in a manner that will increase processing efficiency
- Reduce the amount of time required to process requests
- Reduce processing costs
- 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 information collected on FEMA Forms 086-0-27, 086-0-27A, 086-0-27B, 086-0-27C, 086-0-27D, and 086-0-27E is used to determine if such data will result in the modification of BFEs, SFHA, or floodway. Once the information is collected, it is submitted to FEMA for review and is subsequently included on the NFIP maps. These maps are used by communities for compliance with floodplain management regulations, by lenders in determining the application of the mandatory flood insurance purchase requirements, and by insurance agents in determining actuarial flood insurance rates. Respondents can also contact a call center at 1-877-336-2627 for answers to any questions that might come up during the completion of the data collection instruments.

This collection uses a series of six forms, described below:

a. <u>FEMA Form 086-0-27</u>, <u>Overview and Concurrence Form</u>, provides the basic information regarding the revision request, and requires the signatures of the requester, community official, and a registered professional engineer. This form is required for all revision requests. This form describes the location and nature of the requested NFIP map change, and the data required to support the request.

- b. <u>FEMA Form 086-0-27A</u>, <u>Riverine Hydrology and Hydraulics Form</u>, provides the basic information on the scope and methodology of hydrologic and hydraulic analyses that are prepared in support of the revision request. This form should be used for revision requests that involve new or revised hydrologic or hydraulic analyses of rivers, streams, ponds, or small lakes.
- c. <u>FEMA Form 086-0-27B. Riverine Structures Form</u>, provides the basic information regarding hydraulic structures constructed in the stream channel or floodplain. This form should be used for revision requests that involve new or proposed channelization, bridges/culverts, dams, or levees/floodwalls.
- d. <u>FEMA Form 086-0-27C</u>, <u>Coastal Analysis Form</u>, provides the basic information on the scope and methodology of the coastal analyses that are prepared in support of the revision request. This form should be used for any revision requests that involve new or revised coastal analyses.
- e. <u>FEMA Form 086-0-27D, Coastal Structures Form</u>, provides the basic information regarding hydraulic structures constructed along the coast. This form should be used for revision requests that involve new or proposed levees/dikes, breakwaters, bulkheads, seawalls, and/or revetments located along the coast.
- f. <u>FEMA Form 086-0-27E</u>, <u>Alluvial Fan Flooding Form</u>, provides the basic information for analyses of alluvial fans. This form should be used for revision requests involving alluvial fans.
- 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 forms are made available on the Internet and can be downloaded from the Web site. The forms can be found at the following Web site address: http://www.fema.gov/plan/prevent/fhm/frm_form.shtm. The forms are available on the Internet for download in Microsoft Word and Adobe Acrobat format. Currently, the collection cannot be submitted to FEMA electronically; users print completed forms and mail them to FEMA due to the complexity of the supporting documentation required to be included with the submission (plan sheets, maps with scale detail that precludes scanning and e-mailing as an attachment).

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.

There are no duplicative efforts, and no other existing collection can be used or modified to serve these purposes. The required detailed information on specific locations within communities and the structures documented is not collected or maintained by FEMA.

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.

The impact to small entities (small communities) has been minimized as much as possible. The recent edits serve to make the forms as easy to understand as possible.

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.

If this information were not collected, the NFIP maps could not be revised as required by regulation to reflect current, existing flood hazards. Processing of these requests helps to improve the accuracy of FEMA map products, and the effectiveness of the NFIP. Accurate mapping allows FEMA to be more efficient with its promulgation of the all of the regulations covering the NFIP.

- 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.

There are no special circumstances for this collection that would require 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.

Respondents are not required to prepare a written response to the collection of information in fewer than 30 days after receipt of it.

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

Respondents are not required to submit more than one copy of all documents.

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

Respondents are not required to retain any records pertaining to this collection.

(e) 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.

This collection is not used in statistical surveys.

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

This collection does not require the use of a statistical data classification.

(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.

This collection does not include any pledges of confidentiality.

(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.

This collection does not require respondents to submit confidential information.

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 July 27, 2010, Volume 75, Number 143, pp. 43998. One related to a request for clarification of the difference in notification requirements for LOMRs and PMRs and also questions the cost associated with the notification process 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 November 2, 2010, Volume 75 pp 67382. 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.

FEMA conducts several workshops for community officials, engineers, surveyors, and developers every year on the details and requirements of this information request. Attendees use the opportunity to give comments and request clarifications of instructions.

(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.

FEMA's Web site http://www.fema.gov/plan/prevent/fhm/tsd emap.shtm includes an e-mail address, in which respondents can provide comments regarding the forms and clarity of instructions. The FEMA Mapping Information Exchange (FMIX) also provides a toll free number (1-877-336-2627) to answer questions and provide an opportunity for respondents to comment on the forms.

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 provided to respondents.

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 October 1, 2010. Attached is a drafted copy of the System of Records Notice (SORN) which is currently being reviewed by DHS Privacy Office for updates. Attached is a drafted copy of the Privacy Act Statement which is currently being reviewed by DHS Privacy Office for each form. The status of this information remains the same as of December 2010.

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 for this collection of information.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:
 - (a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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.

For FEMA Form 086-0-27, it is estimated that 1,500 Business Operations Specialists will complete their portion of the form and that it will take an average of .25 hour (15 minutes) to complete the form. Each respondent will complete the form once and the average annual hour burden is $1,500 \times .25$ hour (15 minutes) = 375 hours.

For FEMA Form 086-0-27, it is estimated that 1,500 Local Government Civil Engineers will complete their portion of the form and that it will take an average of .25 hour (15 minutes) to complete the form. Each respondent will complete the form once and the average annual hour burden is 1,500 x .25 hour (15 minutes) = 375 hours.

For FEMA Form 086-0-27, it is estimated that 1,500 Engineers or Surveyors will complete their portion of the form and that it will take an average of .5 hour (30 minutes) to complete the form. Each respondent will complete the form once and the average annual hour burden is $1,500 \times .5$ hour (30 minutes) = 750 hours.

For FEMA Form 086-0-27A, it is estimated that 1,500 Local Government Civil Engineers will complete their portion of the form and that it will take an average of .75 hour (45 minutes) to complete the form. Each respondent will complete the form once and the average annual hour burden is $1,500 \times .75$ (45 minutes) = 1,125 hours.

For FEMA Form 086-0-27A, it is estimated that 1,500 Engineers or Surveyors will complete their portion of the form and that it will take an average of 2.75 hours (165 minutes) to complete the form. Each respondent will complete the form once and the average annual hour burden is $1,500 \times 2.75$ hours (165 minutes) = 4,125 hours.

For FEMA Form 086-0-27B, it is estimated that 1,500 Engineers or Surveyors will complete their portion of the form and that it will take

an average of 7 hours to complete the form. Each respondent will complete the form once and the average annual hour burden is 1,500 x 7 hours = 10,500 hours.

For FEMA Form 086-0-27C, it is estimated that 150 Engineers or Surveyors will complete their portion of the form and that it will take an average of 1 hour to complete the form. Each respondent will complete the form once and the average annual hour burden is 150×1 hour = 150 hour.

For FEMA Form 086-0-27D, it is estimated that 150 Engineers or Surveyors will complete their portion of the form and that it will take an average of 1 hour to complete the form. Each respondent will complete the form once and the average annual hour burden is 150×1 hour = 150 hour.

For FEMA Form 086-0-27E, it is estimated that 150 Engineers or Surveyors will complete their portion of the form and that it will take an average of 1 hour to complete the form. Each respondent will complete the form once and the average annual hour burden is 150×1 hour = 150 hour.

- (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.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respon- dents	No. of Responses per Respon- dent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
State, local, or Tribal Government and Business or other forprofit (Certification	Form 086-0- 27, Overview and Concurrence Form	1,500	1	1,500	1	1,500	\$53.97	\$80,955
	IA Form 086-0- 27	1,500		1,500	1	1,500		80,955

State. Local or Tribal Government	Form 086-0- 27A, Riverine Hydrology and Hydraulics Form	1,500	1	1,500	0.75 (45 minutes)	1,125	\$53.97	\$60,716
Business or other for-profit	Form 086-0- 27A, Riverine Hydrology and Hydraulics Form	1,500	1	1,500	2.75 (165 minutes)	4,125	\$46.65	\$192,431
	IA Form 086-0- 7A	1,500		1,500	3.5 (210 minutes)	5,250		\$253,147
Business or other for-profit	Form 086-0- 27B, Riverine Structures Form	1,500	1	1,500	7	10,500	\$46.65	\$489,825
Business or other for-profit	Form 086-0- 27C, Coastal Analysis Form	150	1	150	1	150	\$46.65	\$6,998
Business or other for-profit	Form 086-0- 27D, Coastal Structures Form	150	1	150	1	150	\$46.65	\$6,998
Business or other for-profit	Form 086-0- 27E, Alluvial Fan Flooding Form	150	1	150	1	150	\$46.65	\$6,998
Total		1,500		4,950		17,700		\$844,921

The wage rate categories above reflect the application of the 1.4 multiplier

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Local Government Civil Engineer is estimated to be (38.55 x 1.4 = 53.97) per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents Local Government Civil Engineer is estimated to \$80,955.00 annually.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for Engineer is estimated to be (39.03 x 1.4 = 54.64) per hour including the wage rate multiplier and for Surveyor is estimated to be (\$27.61 x 1.4 = \$38.65; combining the two totals \$93.29 / 2 = \$46.65. Either type of occupation can be chosen to complete the forms, so an average of the two wage rates is used to determine the cost burden. The estimated burden hour cost to respondents Engineer is estimated to \$844,921.00 annually.

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 is no Capital and Start-Up Cost for this collection.

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instr ument	*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, etc.)	Annual Non- Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
FEMA Form 086-0-27		\$69,975		
FEMA Form 086-0-27A		\$69,975		
FEMA Form 086-0-27B		\$69,975		
FEMA Form 086-0-27C		\$6,998		
FEMA Form 086-0-27D		\$6,998		
FEMA Form 086-0-27E		\$6,998		
Total	\$0	\$230,919	\$0	\$230,919

^{*} Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

The cost to developers for an engineer's or surveyor's services is broken down above for each form. The engineer's services include scoping, surveying cross-sections, developing hydrologic and hydraulic analysis, and preparing work maps and reports documenting the engineering analysis and results. The annual cost burden to the respondents is estimated to be \$230,919.00 annually.

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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Description below.]	\$18,500
Staff Salaries [1 GS12 Step 1 employee spending approximately 5% of time	\$3,744
annually (\$74,872 per year) time to the review, coordination, and approval	
of the final submission for MT-2 forms.] \$74,872 x .05 =	
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0
Equipment Maintenance [cost of annual maintenance/service agreements for	\$0
equipment]	
Travel	\$0
Printing [32,500 MT-2 forms annually @ .6572 per]	\$21,360
Postage [mailing 500 MT-2 forms as requested @.61 per]	\$305
Other	0
Total	\$43,909

The contractor costs are estimated to be \$18,500. This cost includes call center staff responding to an average of 3,200 calls per year that pertain to this collection. Most of these calls are from respondents who require assistance with completing the forms and interpreting the instructions. Based on historical call center data, calls pertaining to the forms lasts an average of 6 minutes. Based on an average loaded rate of \$50.00 per hour, the contractor costs for responding to these calls is \$16,000. The contract costs associated with completing and submitting the required documents for this collection is estimated to be \$2,500. This includes 50 hours and is based on an average loaded rate of \$50.00 per hour.

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 a 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		
Form 086-0-27, Overview and Concurrence Form				1,680	1,500	-180		
Form 086-0-27A, Riverine Hydrology and Hydraulics Form				5,880	5,250	-630		
Form 086-0-27B, Riverine Structures Form				11,760	10,500	-1,260		
Form 086-0-27C, Coastal Analysis Form				1,680	150	-1,530		
Form 086-0-27D, Coastal Structures Form				1,680	150	-1,530		
Form 086-0-27E, Alluvial Fan Flooding Form				1,680	150	-1,530		
Total(s)				24,360	17,700	-6,660		

Explain:

For FEMA Forms 086-0-27, 086-0-27A and 086-0-27B, there is a reduction in the annual hour burden for each form due to less new developments being planned or built in areas where these forms would be required.

For FEMA Form 086-0-27, the current annual hour burden is 1,680 hours, the new hours burden is 1,500 for a decrease of 180 annual hour burden.

For FEMA 086-0-27A, the current annual hour burden is 5,880 hours, the new hours burden is 5,250 for a decrease of 630 annual hour burden.

For FEMA Form 086-0-27B, the current annual hour burden is 11,760 hours, the new hours burden is 10,500 for a decrease of 1,260 annual hour burden.

For FEMA Forms 086-0-27C, 086-0-27D, and 086-0-27E, the previous estimated annual hour burden assumed these forms to be completed by all respondents. The actual number of forms returned is lower due to the limited requests received from coastal area development.

For FEMA Forms 086-0-27C, 086-0-27D and 086-0-27E, the current annual hour burden is 1,680 hours, the new hours burden is 150 for a decrease of 1,530 hours for each form.

There has been no change in the information being collected.

Itemized Change in Annual Cost Burden

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	
Form 086-0-27, Overview and Concurrence Form	-			\$53,671	\$80,955	+\$27,284	
Form 086-0-27A, Riverine Hydrology and Hydraulics Form				\$210,008	\$253,147	+\$43,139	
Form 086-0-27B, Riverine Structures Form				\$374,203	\$489,825	+\$115,622	
Form 086-0-27C, Coastal Analysis Form				\$53,458	\$6,998	-\$46,460	
Form 086-0-27D, Coastal Structures Form				\$53,458	\$6,998	-\$46,460	
Form 086-0-27E, Alluvial Fan Flooding Form				\$53,458	\$6,998	-\$46,460	
Total(s)	_	_	-	\$798,256	\$844,921	+\$46,665	

Explain:

For FEMA Forms 086-0-27, 086-0-27A and 086-0-27B, there is an increase in the annual cost burden for each form due to the application of the 1.4 multiplier even though there are less new developments being planned or built in areas where these responses would be required has decreased the overall number of forms submitted.

For FEMA Form 086-0-27, the current annual cost burden is \$53,671; the new cost burden is \$80,955 for an increase of +\$27,284.

For FEMA Form 086-0-27, the current annual cost burden is \$210,008; the new cost burden is \$253,147 for an increase of \$43,139.

For FEMA Form 086-0-27, the current annual cost burden is \$374,203; the new cost burden is \$489,825 for an increase of \$115,622.

For FEMA Forms 086-0-27C, 086-0-27D, and 086-0-27E, the previous estimated annual cost burden assumed these forms to be completed by all respondents. The actual number of forms returned is lower due to the limited requests received from coastal area development.

For each of the FEMA Forms 086-0-27C, 086-0-27D and 086-0-27E, the current annual cost burden is \$53,458; the new cost burden is \$6,998 for a decrease of \$46,460 for each form.

There has been no change in the information being collected.

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.

FEMA does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION.