

**SUPPORTING STATEMENT  
FOR  
BRIDGE PERMIT APPLICATION GUIDE  
OMB Control No.: 1625-0015  
Collection Instruments: None**

**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 (NEPA), 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**

As stated in question 1 above, it is against the law to build a bridge over the navigable waters of the United States without approval of the plans and location of such structures. The Coast Guard, before a bridge permit is issued or denied, uses the information provided by the applicant to evaluate the effect the bridge project will have on the reasonable needs of navigation and on the human environment. The applicants are private entities, Federal, state, or local government agencies, or organizations employing more than 100 persons.

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

Applicants can now submit the required material electronically to the Coast Guard via email, CD-ROM or posting documents to applicant websites for Coast Guard download. Development of the Bridge Permit Application Guide (BPAG), COMDTPUB P16591.3 (series) and the Bridge Administration Manual (BAM), CONDTINST M16590.5 (series) 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 granting of a bridge permit over the navigable waters of the United States is a unique function that falls solely under the jurisdiction of the Coast Guard. There is no duplication in the collection of necessary information to complete an application.. The procedures for developing environmental assessments or environmental impact statements (40 CFR 1506) require 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.

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

Not applicable. The respondents are, with private entities, 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 of either not collecting this information or conducting it less frequently would be noncompliance with statutory and regulatory requirements. The Coast Guard's bridge permit program would become ineffective and their 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 could jeopardize maritime navigation. Every application for a CG bridge permit must go through this collection process. The CG has no influence on how many bridge applications it receives annually. Federal funding for transportation projects is the largest influence.

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

None.

**8. Solicitation of Comments.**

A 60-day Notice was published in the *Federal Register* to obtain public comment on this collection (see [USCG-2011-0914]; October 4, 2011; 76 FR 61369). Additionally, a 30-day Notice was published in the *Federal Register* to obtain public comment on this collection (December 16, 2011; 76 FR 78289). The Coast Guard has not received any comments on this information collection.

**9. Provide any payment or gift to respondents.**

Not applicable. Neither applicants nor respondents to public notices on bridge projects are compensated for providing data or information.

**10. Assurances of confidentiality provided to respondents.**

Not applicable. 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). (From COMDTINST M16590.5C, Bridge Administration Manual, paragraph 1.M.2.).

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

Not applicable. The Bridge Permit Application Guide contains no questions of a personal or private nature.

**12. Estimate of annual hour and cost burden.**

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

Number of Bridge Permit Applicants (Respondents):

FY11 – Low Impact 28 + High Impact 64 = 92 total

FY10 -- 62; FY09 -- 69; FY08 -- 72

**Note:** The totals shown for FY08, FY09 and FY10 show the number of complete applications received by the Coast Guard for which a public notice was issued. This does not capture the applications that are received which are incomplete and require additional processing by the Coast Guard District Bridge Offices. To account for this work the Program estimates to be in receipt of an additional 25 incomplete applications at any given time. The FY11 data now reflects the addition of these 25 applications for more accurate workload measurement.

Applicant cost to provide the information contained in the Bridge Permit Application Guide can vary greatly depending upon the level of environmental documentation required under NEPA. There are three levels of NEPA documentation: categorical exclusions (CE), environmental assessments (EA) and environmental impact statements (EIS). For the purposes of this OMB evaluation categorical exclusions shall be considered low impact projects by the Bridge Program since they typically require minimal coordination and documentation. Application preparation for low impact projects account for

approximately 30% of Coast Guard Bridge Permit Applications. EAs and EISs require a much more rigorous analysis and take more time and capital to produce so they are considered to be high impact projects by the Program. Application preparation for high impact projects account for approximately 70% of Coast Guard Bridge Permit Applications.

The majority of the applications received by the Coast Guard are from federal applicants such as the Federal Highway Administration, for which the Coast Guard is not the lead federal agency for NEPA. The Coast Guard is not the lead federal agency for approximately 80% of Coast Guard Bridge Permit Applications because all Federal actions must comply with the provisions of the National Environmental Policy Act (NEPA) of 1969. For 80% of permit applications the applicant is another federal agency (usually FHWA but sometimes FRA/FTA, etc). Any Federal applicant for a bridge permit becomes responsible as the lead federal agency under NEPA to conduct a NEPA evaluation. The NEPA documentation has already been prepared at the time of application since the lead federal agency is required to prepare NEPA documentation when federal funding is involved. The below numbers do not include the number of hours and associated costs a federal applicant spends on NEPA documentation since the documentation is not a sole requirement of the Coast Guard, but a requirement that is met before a Coast Guard Bridge permit application is considered. Due to staffing limitations, the Coast Guard typically requires the applicant to prepare the NEPA documentation when it is the lead federal agency, approximately 20% of the time. NEPA documentation requirements varies based upon the impacts and complexity of the project. Implementation procedures are based on Council on Environmental Quality (CEQ) Regulations found in 40 CFR 1500-1508. When a private entity/owner applies for a CG bridge permit the CG must now assume lead federal agency responsibilities for NEPA. The CG Bridge Program often coordinates with the private applicant to have them produce the NEPA documentation for the CG to expedite the permit process, as allowed by the CEQ regulations. The cost to do this then falls to the applicant. Market research suggests that low impact (CE) projects typically take 120 hours to produce a NEPA document at an estimated cost of \$12,000. High impact (EA and EIS) projects typically take between 500 (EA) and 5,000 (EIS) hours to produce a NEPA document at an estimated cost of between \$50,000 (EA) and \$500,000 (EIS). Sections a. and b. below represent low and high impact projects, respectively.

The calculations and derivations contained below are based upon the level of NEPA documentation required for the proposed project and reflect the low impact/high impact determination. The costs shown are also based upon the schedule of hourly rates for personnel contained in enclosure (2) to COMDTINST 7310.1M. Total estimated respondent financial cost for FY11 is shown in Section c. at \$836,816. These calculations do not include the hours and cost for NEPA documentation preparation described above.

- a. Application preparation by the applicant for *low impact* projects (categorical exclusions).**  
 These projects account for approximately 30% of Coast Guard Bridge Permit Applications. Rates are based on COMDTINST 7310.1M Coast Guard Reimbursable Standard Rate dated 31 August 2011.

Within government (I/G)

Outside government (O/G)

Pre-application consultations w/federal, state, local govt. (GS-13/14, O/G \$96) X 8 hrs	=	\$768.00
Application preparation (GS-11, O/G \$59) X 40 hrs	=	\$2,360.00
Clerical (GS-5/8, O/G \$48) X 4 hrs	=	\$192.00
Drawings prepared (GS-9, O/G \$50) X 10 hrs	=	\$500.00

Respondent financial burden per application	=	\$3,820.00
Respondent burden hours per application, low impact	=	62 hrs
Total Respondent hours - 62 X 28 applications	=	1,736 hrs
Total Respondent Cost - \$3,820.00 X 28 applications (30% of 92, FY11)	=	<b>\$106,960.00</b>

- b. Application preparation for high impact projects (environmental assessments and environmental impact statements).** These projects account for approximately 70% of Coast Guard Bridge Permit Applications.

**Note:** the hourly differences between an environmental assessment and an environmental impact statement are evident in the NEPA document preparation, and not with the other Bridge Permit Application requirements, as described below.

Within government (I/G)

Outside government (O/G)

Pre-application consultations w/federal, state, local govt. (GS-13/14, O/G \$96) X 87 hrs	=	\$8,352.00
Application preparation (GS-11, O/G \$59) X 40 hrs	=	\$2,360.00
Clerical (GS-5/8, O/G \$48) X 4 hrs	=	\$192.00
Drawings prepared (GS-9, O/G \$50) X 10 hrs	=	\$500.00
Respondent financial burden per application	=	\$11,404.00
Respondent burden hours high impact	=	141 hrs
Total Respondent hours - 141 X 64 applications	=	9,024 hrs
Total Respondent Cost - \$11,404.00 X 64 applicants (70% of 92, FY11)	=	<b>\$729,856.00</b>

- c. FY 11 total respondent hours = 10,760 hrs**

- d. FY 11 total respondent cost = \$836,816.00**

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

The estimated cost for the copying, postage and handling of a bridge permit application:

Low Impact Project	=	\$50.00
Total Respondent Cost - \$50.00 X 28 applications (30% of 92, FY11)	=	<b>\$1,400.00</b>
High Impact Project	=	\$200.00
Total Respondent Cost - \$200.00 X 64 applications (70% of 92, FY11)	=	<b>\$12,800.00</b>
<b>FY 11 estimated total cost</b>	=	<b>\$14,450.00</b>

**14. Estimates of annualized cost to the Federal Government.**

The estimated annual federal cost for administration for FY 11 is \$1,129,503; this number will change slightly from year to year depending on the number of application received in that year. 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 7310.1M.

- a. Prepare District jurisdictional and navigational determinations, review and provide feedback for application package, prepare and distribute Coast Guard public notice and agency notifications, review and address public concerns, and prepare District Findings of Fact (total 78.4 hours). These actions differ very little between low impact and high impact projects as well as between Coast Guard lead vs. non-lead federal agency.

CG application review and acknowledgment  
(GM-12, I/G \$65) X 12 hrs = \$780.00

CG jurisdictional/navigation clearance determinations & coordination (GM-12, I/G \$65) X 25 hrs	=	\$1,625.00
Prepare and distribute CG Public Notice/Agency Notifications (GS-13/14, I/G \$90) X .50 hrs	=	\$45.00
(GS-12, I/G \$65) X 11 hrs	=	\$715.00
Review and prepare public notice responses (GS-12, I/G \$65) X 3.5 hrs	=	\$227.50
Prepare District Findings of Fact. Same for low and high impact, same for Coast Guard lead vs. non-lead (GS-12, I/G \$65) X 26 hrs	=	<u>\$1,690.00</u>
<b>78 hrs</b>		<b>\$5,082.50</b>

- b.** When the Coast Guard *IS NOT* the lead federal agency, review and comment on preliminary and final environmental documents, attend resource/regulatory agency meetings and draft Finding of No Significant Impact (FONSI) or Record of Decision (ROD) for high impact projects. These projects account for approximately 80% of Coast Guard Bridge Permit Applications.

Review and comment on preliminary and final environmental documents. (GS-12, I/G \$65) X 18 hrs	=	\$1,170.00
Attend resource/regulatory agency meetings. (GS-12, I/G \$65) X 3 hrs	=	\$195.00
Draft FONSI or ROD for high impact projects. (GS-12, I/G \$65) X 5 hrs	=	<u>\$325.00</u>
<b>26 hrs</b>		<b>\$1,690.00</b>

- c.** When the Coast Guard *IS* the lead federal agency review environmental documents, to include reviewing applicant prepared environmental documents and coordination and consultation with natural resource agencies (average for low and high impact = 37 hours). These projects account for approximately 20% of Coast Guard Bridge Permit Applications.

Review applicant-prepared preliminary and final environmental documents (GS-12, I/G \$65) X 25 hrs	=	\$1,625.00
Attend resource/regulatory agency meetings. (GS-12, I/G \$65) X 12 hrs	=	\$780.00
Circulate and address comments and concerns.		
Low Impact (GS-12, I/G \$65) X 17 hrs	=	\$1,105.00
High Impact (GS-12, I/G \$65) X 60 hrs	=	\$3,900.00
Draft CE determination, FONSI or ROD, review and comment on final environmental document.		
Low Impact (GS-12, I/G \$65) X 8 hrs	=	\$520.00
High Impact (GS-12, I/G \$65) X 58hrs	=	\$3,770.00

Prepare final environmental document/cover for agency signature, prepare permit package for District/Commandant review, prepare transmittal letter/case file and completion report.

Same for low and high impact

(GS-12, I/G \$65) X 23hrs = \$1,495.00  
 (GS-13/14, I/G \$90) X 4.75 hrs = \$427.50

**89.75 hrs** Low impact = **\$5,952.50**  
**182.75 hrs** High impact = **\$11,997.50**

- d.** Coast Guard HQ receives application package, evaluates impacts on navigation and the environment, prepares written evaluations, bridge permit or denial, and transmittal letter to District. This section applies to all applications.

Low Impact

(GS-15, I/G \$105) X 3.50 hrs = \$367.50  
 (GS-13, I/G \$77) X 32.50 hrs = \$2502.50  
 (GS-8, I/G \$45) X 1.00 hrs = \$45.00

**37 hrs** Low impact = **\$2,915.00**

High Impact

(GS-15, I/G \$105) X 5.50 hrs = \$577.50  
 (GS-13, I/G \$77) X 46.50 hrs = \$3580.50  
 (GS-8, I/G \$45) X 1.00 hrs = \$45.00

**53 hrs** High impact = **\$4,203.00**

- e. FY 11 Coast Guard hours per response:**

Low impact projects, Coast Guard **not** the lead federal agency = **141.00 hrs** (a+b+d(low))

Low impact projects, Coast Guard **is** the lead federal agency = **204.75 hrs** (a+c(low)+d(low))

High impact projects, Coast Guard **not** the lead federal agency = **157.00 hrs** (a+b+d(high))

High impact projects, Coast Guard **is** the lead federal agency = **313.75 hrs** (a+c(high)+d(high))

- f. FY11 Total Cost burden hours:**

The calculations in this section are based upon 92 projects for FY 11. 30% were considered low impact (28 applications). Of this 20% were Coast Guard lead (5.6 applications) and 80% were not Coast Guard lead (22.4 applications). 70% of the applications were considered high impact projects (64 applications). Of this 20% were Coast Guard lead (12.8 applications) and 80% were not Coast Guard lead (51.2 applications). These numbers are used to generate the Coast Guard burden hours.

Total Coast Guard burden hours (low impact projects, Coast Guard not the lead federal agency)  
 = **3,158.4 hrs** (22.4 applications X 141 hrs)

Total Coast Guard burden hours (low impact projects, Coast Guard is the lead federal agency)  
 = **1,146.6 hrs** (5.6 applications X 204.75 hrs)

Total Coast Guard burden hours (high impact projects, Coast Guard not the lead federal agency)  
 = **8,038.4 hrs** (51.2 applications X 157 hrs)

Total Coast Guard burden hours (high impact projects, Coast Guard is the lead federal agency)  
 = **4,016.0 hrs** (12.8 applications X 313.75 hrs)

Total Coast Guard burden hours, FY 11 = **16,359.4 hrs**

**g. FY11 Federal government financial burden**

Coast Guard financial burden (low impact projects/Coast Guard not the lead federal agency)  
= **\$217,014** (\$9,687.50(a+b+d(low)) / 141 hrs = \$68.71 hr X 3,158.4 hrs)

Coast Guard financial burden (low impact projects/Coast Guard is the lead federal agency)  
= **\$78,118** (\$13,950 (a+c(low)+d(low)) / 204.75 hrs = \$68.13 hr X 1,146.6 hrs)

Coast Guard financial burden (high impact projects/Coast Guard not the lead federal agency)  
= **\$561,965** (\$10,975.50 (a+b+d(high)) / 157 hrs = \$69.91 hr X 8,038.4 hrs)

Coast Guard financial burden (high impact projects/Coast Guard is the lead federal agency)  
= **\$272,406**(\$21,282.50 (a+c(high)+d(high)) / 313.75 hrs = \$67.83 X 4,016.0 hrs)

Total Federal Cost (FY 11, 92 applications) = **\$1,129,503**

**15. Reason for changes or adjustments in the burden.**

In June 2009, the Coast Guard Bridge Program conducted an internal workload management audit to better determine program output. This caused no additional public burden and due to this agency estimate the Coast Guard was able to better determine the actual burden hours and separate those burden hours into new low and high impact project categories. Total public burden hours of the Bridge Permit Program were an estimated 3,315 in FY 08. Actual public burden hours for FY 08 was 3,672, an increase of 357 burden hours using old calculation methods. There was no change to the information being collected; however, due to the internal workload management audit, the previous average number of 51 hours per response is no longer applicable. The new low and high impact projects categories more accurately capture the hours of response. Using the information from the audit it has been determined that it now requires 62 hours per response for low impact projects and 141 hours per response for high impact projects. This was the first year that the burden hours were broken out into low and high impact so there is no historical data available to show the adjustments for low and high impact projects. Total public burden hours for FY 11 are estimated at 10,760. Having adjusted the calculations, from this point on the Program anticipates typical changes in burden which are normally attributed 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. While historical data for FY 09 and FY 10 showed relatively moderate growth, FY 11 experienced a substantial increase in burden hours due to the previously mentioned documentation of work (25 work-in-progress applications) that has never before been captured.

This agency estimate also identified a substantial increase in the estimated annualized cost to the Federal Government since the last OMB approval period. The cost estimates provided in section 14 above utilize the hourly workload estimates identified in the audit which were previously grossly underestimated. The ICR has been updated to capture the cost per respondent in ROCIS; the annual cost burden was not captured in the previous submission.

**16. Plans for tabulation, statistical analysis and publication.**

Not applicable. No publication of collected information or statistical analysis is planned.

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

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

**18. Exception to the certification statement.**

There are no exceptions.



**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

Not applicable. The collection does not employ statistical methods.