

Supporting Statement A:

Submissions for Generic Clearance for Collecting Voluntary Public Feedback on NCPC Planning Initiatives

Justification

Circumstances Making the Collection of Information Necessary

NCPC is the federal government's central planning agency for the National Capital Region. Pursuant to the National Capital Planning Act (40 USC, §§8701 et. seq.) NCPC prepares a comprehensive plan for the National Capital Region; reviews federal and some District of Columbia proposed developments, projects and plans; reviews District zoning amendments; prepares an annual Federal Capital Improvements Program and reviews the District Capital Improvements Program.

To fulfill the mission established in the National Capital Planning Act, NCPC needs to conduct additional planning studies to inform the activities noted above. NCPC's planning work can occur at different scales and geographic boundaries: regional, city-wide, neighborhood, and site-specific. NCPC's planning studies address broad policy topics, such as parks and open space, view protection, or foreign missions, as well as physical design planning for specific sites and precincts.

Over the next three years, NCPC will conduct the following planning initiatives:

- Update to the elements of the Comprehensive Plan for the National Capital, including a new Urban Design Element
- Update the Parks and Open Space Element and conduct a study of parks in Washington, DC
- Advance an initiative for Pennsylvania Avenue
- Conduct regional climate adaptation and infrastructure studies; Climate Adaptation Studies
- Prepare one or more viewshed studies
- Prepare one or more commemoration studies and plans
- Develop area-specific plans for federal precincts in the Monumental Core, including the SW Ecodistrict and the NW Rectangle.

Other new initiatives may be proposed during the next three years. While NCPC establishes a multi-year strategic plan and a yearly work program anticipating major initiatives, the agency's work is strongly shaped by external factors, including new Administration directives and the planning and development decisions of other federal agencies and local governments in the region.

To fulfill the agency mission and consistent with best planning practices, NCPC's planning initiatives are predicated on receiving public input at all development stages. Public input is voluntary. The affected public may include individuals, agencies, and organizations within the National Capital Region, as well as national and even international audiences. Agency staff may receive requests from the Commission to solicit public input on specific topic areas identified as a planning process unfolds. NCPC's plans affect federal and non-federal properties, regional residents and workers, federal and local government agencies, visitors, development interests, businesses, and civic and interest-based organizations.

NCPC has regulatory responsibilities to review federal agency and certain District of Columbia development proposals and plans. This generic clearance is not intended to apply to public opportunities for formal public comment to the Commission on reviewed development proposals and

plans, including public comment activities related to the agency's National Environmental Policy Act or Section 106 Historic Preservation obligations.

Purpose and Use of the Information Collection

Based on prior experience and current practice, NCPC collects qualitative, voluntary public feedback to inform NCPC staff and Commissioners as each planning initiative is developed. While the exact information requested from the public cannot be determined at this time, the general nature of the collection and collection tools used are described below.

Collection Tools:

- **Public workshops and meetings:** NCPC conducts meetings where participants are provided with briefing materials and are asked to voluntarily provide comments verbally and/or in writing in response to open-ended questions. These meetings often occur in advance of a formal public comment period. Charettes are intensive public workshops, typically focused on soliciting input on physical design alternatives.
- **Focus Groups:** Groups representing various interests (for example: business community, neighborhood, historic preservation, environmental) meet with agency staff and respond to open-ended questions.
- **Online public comment portals:** The public voluntarily provides comments on questions or other information (such as photographs, models or plan drawings) on a web-based platform. These comment pages publically display all submitted comments.
- **Social media comment portals, such as Facebook.** The public voluntarily provides comments on open-ended questions or other information provided through a social media platform.
- **Written public comments.** The public voluntarily provides input on open ended questions or other information through a workbook or paper questionnaire.
- **Formal public comment periods and public hearings.**
- **Idea Competitions:** The public is asked to propose ideas for programming, land uses, or physical improvements, and review and respond to already posted ideas. These competitions are used to generate information about the range of possible programs, uses, or improvements to inform plans and policies. In some instances, competitions result in pilot projects used to explore concepts or policies proposed for plans.

To offer the public the broadest possible opportunity to comment, NCPC may ask the same questions in different formats: on line, in writing, and verbally at public meetings and focus groups.

The purpose of collecting public input is to inform and shape NCPC's planning work at the earliest opportunity. Early in a planning study, public feedback is used to shape the direction and scope of the study, including possible vision and goals, study alternatives, and anticipated issues. At later stages, NCPC has often completed technical studies, and identified and developed options and alternatives for policies, physical development plans, or programs. Public input helps the agency evaluate the accuracy and usefulness of studies, and conveys preferences and responses to alternatives.

Towards the end of a planning study, NCPC has typically developed early drafts of plans and policies and is seeking more detailed public comments, often on a preferred plan idea or approach. Public input is often organized around major plan/policy topics and key decisions. Public input helps the agency

evaluate the full range of possible impacts and understand the preferences of the public prior to acting on a proposed policy or plan.

Information collected is used by agency staff as they develop policy and development plans. For some initiatives, steering committees comprised of representatives from federal and public sector agencies provide advisory guidance on agency policy and development plans. These committees review and consider public input prior to providing guidance. The Commission reviews informal public input, sometimes provided in summary form, as well as formally-submitted public comments as part of their deliberations and actions on draft and final agency plans. NCPC seeks public input as a matter of good planning practice, but has no statutory obligation to seek public input for the initiatives that are the subject of this generic request.

NCPC will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will yield qualitative information. Collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study.
- The collections are voluntary.
- Any Personally Identifiable Information (PII) collected is limited to name, email address, or mailing address.
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low cost for both the respondents and the federal government.

Collected public information in support of planning initiatives is typically available to the public unless subject to privacy or security considerations. Public information may be provided verbatim or in summary format, depending on the collection tool used, may be shared online or in written reports, and is available in the agency's records, as well as through Freedom of Information Act requests. All collection tools will prominently state that the information will be publicly available.

Consideration Given to Information Technology

As appropriate, NCPC will collect information electronically or use online collaboration tools to reduce burden.

Duplication of Information

No similar data are gathered or maintained by NCPC or are available from other sources known to the agency. NCPC frequently conducts its work in partnership with other federal or local government agencies. NCPC often asks partner agencies to assist in publicizing opportunities for public comment; however, when NCPC originates public comment documents, NCPC is responsible for collecting and using the comments. Where partner agencies have already developed information suitable for NCPC's use, NCPC would use this information.

Reducing the Burden on Small Entities

Small businesses or other small entities, such as non-profit organizations, may be involved in NCPC's public outreach efforts. NCPC will minimize the burden on them of information collections approved

under this clearance by offering multiple options to submit information, including on-line formats; using short, easy-to-complete information collection instruments; and using focus groups as appropriate.

Consequences of Not Conducting Collection

Without these types of feedback, NCPC will not have timely information to inform development of planning documents and products, part of its core mission. If this information is not collected, the products prepared for NCPC's planning initiatives will not reflect a comprehensive understanding of public interests and potential issues and opportunities. While NCPC is not an implementation agency, failure to solicit comments from the public, including parties with potential implementation authorities or interests, may result in policies and plans that are inappropriate or ineffective.

Special Circumstances

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

Consultations with Persons Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 and its implementing regulations NCPC published a 60 day notice for public comment on this request in the Federal Register (Volume 80, Number 15, Page 3658) on January 23, 2015. No public comments were received.

Payment or Gift

NCPC will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

Confidentiality.

All public outreach materials are reviewed by NCPC's General Counsel in advance of release for consistency with NCPC's approved policies on privacy (including protection of personally identifiable information) and security. Collected public information in support of planning initiatives is typically available to the public unless subject to privacy or security considerations.

Sensitive Nature

All public outreach materials are reviewed by NCPC's General Counsel in advance of release for consistency with NCPC's approved policies on privacy (including protection of personally identifiable information) and security. Collected public information in support of planning initiatives is typically available to the public unless subject to privacy or security considerations.

Burden of Information Collection

Table 1 – Estimated Three Year Reporting Burden

	# of events	Avg # of respondents / event	# of responses	Hours / response	Total Hours
Focus Groups	119	15	1785	1.5	2677.5

Public Meetings	57	50	2850	1	2850
Online comment	27	300	8100	0.5	4050
Questionnaire	15	100	1500	0.25	375
Ideas Competition	5	400	2000	.5	1000
Design Charrette	3	100	300	1.5	450
Total	226	965	15235		11402.5

Costs to Respondents

No costs are anticipated.

Costs to Federal Government

	Staff time in hours over three years	Agency costs for materials, software licenses, and public notice over three years
Focus Groups	1363	0
Public Meetings	6182	3600
Online comment	1400	5100
Questionnaire	552	50
Ideas Competition	1960	6000
Design Charrette	1224	1600
Total	226	965

NCPC estimates that the total staff time to prepare, conduct, and analyze public outreach identified under this generic request over the next three years is 11,281 hours, or approximately 1.8 FTE/year. Other costs to the agency, including materials, software licensing, and public notifications are estimated at \$16,000 over the next three years, or \$5,333/year. These costs would be incurred by the agency regardless of the information collection request; for example, we would conduct and provide public notice of public meetings related to planning initiatives even if information collections did not occur.