

Supporting Statement A:

Submissions for Information Collection for Public Comment on Development of Pennsylvania Avenue Square Guidelines for Squares 378/9

Justification

Circumstances Making the Collection of Information Necessary

The National Capital Planning Commission (NCPC) is the federal planning agency for the Nation's Capital. Pursuant to the National Capital Planning Act (40 USC, §§8701 et. seq.) NCPC prepares a comprehensive plan for the National Capital Region and reviews federal and some District of Columbia proposed developments, projects and plans. NCPC also has additional authorities, such as creating square guidelines for the 1974 Pennsylvania Avenue Development Plan (40 USC §§6702 (d), see also 61 Federal Register 41789, 41791 (August 12, 1986)). These guidelines, which are similar to zoning regulations, influence the design, height and use of parcels within the Pennsylvania Avenue Plan boundary between 1st and 15th streets, NW.

The decision to pursue an exchange partner for services to construct a new FBI headquarters in exchange for title to the existing headquarters building located on Pennsylvania Avenue requires development of guidelines for squares 378 & 379 (the site of the FBI building). NCPC is seeking public input on what should be included in the square guidelines, as the guidelines will regulate redevelopment of the FBI headquarters site, an important and highly visible area along Pennsylvania Avenue. NCPC proposes a series of public meetings over the course of the year to receive feedback, the first two of which will take place in late April and are the subject of this request.

Purpose and Use of the Information Collection

The purpose of this public information collection is to inform and shape the direction and scope of NCPC's work to develop square guidelines. Public input helps the agency evaluate the accuracy and usefulness of studies, and conveys preferences and responses to alternatives.

The Commission will review this public input, which may be provided in summary form, as well as formally-submitted public comments as part of their deliberations and actions on draft and final square guidelines. NCPC seeks public input as a matter of good planning practice, but has no statutory obligation to seek public input for this activity.

Collection Tools:

There will be two public meetings: one at 6:00pm on April 26, 2016 and one at 9:30am on April 28, 2016. NCPC is providing two alternative times to provide scheduling flexibility to potential participants. NCPC will provide the same information, and will seek the same types of input at these meetings. After the public meetings, NCPC will accept online comments on the same questions for a 2-week period on a webpage that will also display a video recording of the April 26 meeting. To offer the public the broadest possible opportunity to comment, NCPC will ask the same questions in different formats: on line, in writing, and verbally at public meetings.

NCPC will use the open-ended questions, as shown on the attached instrument, to facilitate and guide discussion at each event. We may provide additional information, frame the questions in a different way, or ask participants clarifying questions based on their response. Participants will

have the option of answering questions/providing feedback verbally during the public meeting (recorded by staff), or via paper comment sheets that will be available at each event. In addition, participants may provide comments via an online comment web page up to two weeks after the event. The online comment web page will provide links to the presentation as well as links to graphic materials used during the meeting. The questions on the comment sheets and the online comment web page will be the same questions used in the meeting.

- After a presentation on the history of Pennsylvania Avenue, the development of the square guidelines and the review process for future redevelopment of squares 378 & 379:
 - o *Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Squares 378 & 379, or how and when you will be able to provide input?*
- After presentation on the topics (such as building envelope, circulation, design, general land use) that will be considered for inclusion in the draft square guidelines:
 - o *Are these the right topics to include in the guidelines?*
 - o *Are there additional topics NCPC should consider?*
 - o *Are certain topics more important to you than others, and if so why?*
- After NCPC presents a general discussion of different building heights for squares 378 and 379 and varying build-to-lines for Pennsylvania Avenue:
 - o *Do you have comments on NCPC's initial discussion of possible building heights and possible build-to-lines for Squares 378 & 379?*
- *Do you have any additional comments?*

Commenters may voluntarily provide their name and/or organization represented, email, and/or address.

This collection, proposed for approval under the previously authorized generic clearance, 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.
- Personally Identifiable Information (PII) collected is limited to name and/or organization, email address, or mailing address. This information is requested to attribute comments and is also used to keep participants informed regarding any future meetings, or events. Providing this information is voluntary.
- 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 collected here may be provided verbatim or in summary format, 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. The collection tools will prominently state that the information will be publicly available.

Consideration Given to Information Technology

NCPC is providing the public the opportunity to answer these questions online at the agency website.

Duplication of Information

While related planning and NEPA efforts (described below) are occurring in and around Square 378/379 that provide useful information, no similar data from the public is or has been gathered specific to the square guidelines.

Related efforts:

The General Services Administration has developed a draft Environmental Impact Statement related to the site selection of the new FBI headquarters, which includes general information about the current FBI Headquarters facility located at Squares 378 and 379. Public meetings were held and public comments were received; however, this information is primarily focused on the potential sites for the new headquarters facility, and not the redevelopment of the existing FBI building property.

NCPC is also conducting planning studies, in partnership with other federal and District of Columbia agencies, for the broader neighborhood around Pennsylvania Avenue, NW, of which Squares 378/379 are part. On July 23, 2014 NCPC hosted a public meeting where initial information was collected on Pennsylvania Avenue's character, role, and unique aspects. The feedback was used to develop an aspiration statement for the avenue. NCPC will consider these other sources of information in developing the square guidelines.

Reducing the Burden on Small Entities

Small businesses or other small entities, such as non-profit organizations, may be involved in this public outreach effort. NCPC has minimized their information collection burden by offering multiple options to submit information, including on-line formats; providing short, easy-to-complete information collection instruments; and documenting verbal comments.

Consequences of Not Conducting Collection

Without these types of feedback, NCPC will not have timely information to inform development of the square guidelines. 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 when used to guide future development proposals at this location, as well as guide future development review by federal and District of Columbia agencies, including NCPC.

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 in the Federal Register (Volume 80,

Number 15, Page 3658) on January 23, 2015 for the generic information collection request under which this request is submitted. No public comments were received.

Payment or Gift

NCPC will not provide payment or other forms of remuneration to respondents for this information collection.

Confidentiality / Sensitive Nature

This public outreach materials will be 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. Participating members of the public may provide their name, email, and other information voluntarily, but can submit comments without providing this information. 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 Reporting Burden

	# of events	respondents / event	# of responses	Hours / response	Total Hours
Public Meetings	2	75	150	.75	112.5
Online comment	1	100	100	.75	75
Total	3		250		187.5

Costs to Respondents

No costs are anticipated.

Costs to Federal Government

	Staff time in hours	Agency costs for materials, software licenses, and public notice
Public Meetings	80	0
Online comment	24	0
Total	104	0

NCPC estimates that the total staff time to prepare, conduct, and analyze public outreach identified for this request include 20 hours each for four staff to prepare meeting materials, publicize, conduct the two meetings, and compile and analyze public comment. An additional 24 hours will be needed to develop and post the materials and questions online. In total, this is 104 hours of staff time. Other costs to the agency, including materials, software licensing, and public notifications are 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.