

**SUPPORTING STATEMENT  
EVALUATIONS OF COASTAL ZONE MANAGEMENT ACT PROGRAMS: STATE  
COASTAL MANAGEMENT PROGRAMS AND NATIONAL  
ESTUARINE RESEARCH RESERVES  
OMB CONTROL NO. 0648-0661**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

The [Coastal Zone Management Act of 1972](#), as amended (CZMA; 16 U.S.C. 1451 *et seq.*) requires that state coastal management programs (CMPs) and national estuarine research reserves (NERRs or research reserves) that are developed pursuant to the CZMA and approved by the Secretary of Commerce be evaluated periodically. This request is for a revision/extension of the information collection to accomplish those evaluations.

Section 1458 of the CZMA (previously numbered Section 312, which has historically been the number used to refer to the evaluation process and is done here as well) and implementing regulations at [15 CFR 923](#), Subpart L, require that state CMPs be evaluated concerning the extent to which the state has:

- 1) implemented and enforced the program approved by the Secretary;
- 2) addressed the coastal management needs identified in 16 U.S.C. 1452(2)(A) through (K);  
and
- 3) adhered to the terms of any grant, loan, or cooperative agreement funded under the CZMA.

Section 1461(f) of the CZMA and implementing regulations at 15 CFR 921, Subpart E, require that research reserves be evaluated with regard to:

- 1) their operation and management, including education and interpretive activities;
- 2) the research being conducted within the research reserve; and
- 3) adherence to the requirements of section 1458 of the CZMA and procedures set forth in 15 CFR 923.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

NOAA's Office for Coastal Management (OCM) conducts periodic evaluations of the 34 CMPs and 28 research reserves and produces written findings for each evaluation. Each CMP and research reserve will be evaluated (and thus need to provide information pursuant to this collection request) approximately once every five (5) to (6) years. Partners and stakeholders of a program being evaluated will be asked to provide information during the same timeframe.

As an outcome of this revision process, specific information needs were identified that OCM must have to evaluate the programs against the requirements of the CZMA. OCM has access to documents, information and data submitted in cooperative agreement applications, semi-annual performance progress reports, and certain documentation required by the CZMA and

implementing regulations. However, additional information from each CMP and research reserve, as well as information from the CMP and research reserve partners and stakeholders with whom each works, is necessary to evaluate against statutory and regulatory requirements. Different information collection subsets are necessary for 1) CMPs, 2) research reserves, 3) partners and stakeholders of CMPs, and 4) partners and stakeholders of research reserves.

A few minor changes to questions #3 and #7 have been made to the information submittal for CMP and reserve managers. The changes clarify and narrow the scope of the information collected. For the list of stakeholders, the number of names request has been raised from 12-20 to 20-30 to provide for more potential respondents to the survey. Many program managers choose to work with their OCM program specialist to develop the list. In order to obtain a wider sample with the combined list we have requested additional names. For question #7 on the CMP information submittal, one change was made in response to a GAO audit recommendation to make sure that potential stakeholders surveyed could as a group address the suite of issues in the CZMA, including public access. For questions #12, 13, 15, 16, 18, 19, 22, 23, 25, 26, 28, and 29 the questions have been clarified to focus on the top 2-4 challenges or impacts for an area. In addition, one question in the CMP information submittal was reordered based on feedback from a program.

For the survey of stakeholders, the scope of questions has been reduced by 4 questions for the reserve survey and 9 questions for the coastal program surveys. In addition, minor modifications have been made to several questions. The surveys have been shortened so that respondents and OCM can focus on the questions that provide the most useful information and this also reduces the time burden for survey respondents. In addition, the questions remaining in the survey are of a more general nature and respondents can answer without providing identifying information if they so choose.

The information requests, included in this submission, for CMPs and for research reserves identify the statutory and/or regulatory citations for evaluation criteria for which OCM requires the information to determine a program's compliance during the evaluation.

The information request for coastal management programs contains eight sections:

- Section I, Questions #1 through #10 and #35 address the administration, operation, and management of the program, as required by 16 USC §1458(a) and 16 USC §1455(d);
- Section II, Questions #11 through #13 elicit information about the protection of natural resources and coastal habitat, as required by 16 USC §1452 (2)(A);
- Section III, Questions #14 through #16 request information explaining how the CMP addresses coastal hazards and the adverse effects of land subsidence and sea level rise, as required by 16 USC §1452(2)(B) and 16 USC §1452 (2)(K);
- Section IV, Questions #17 through #19 seek information about how the program addresses coastal water quality as required by 16 USC §1452(2)(C);
- Section V, Questions #20 through #23 request information about how the program addresses coastal dependent uses, siting of major facilities, and community development;

assistance to support planning, conservation, and management for living marine resources, including aquaculture facilities; and redevelopment of deteriorating urban waterfronts and ports, as required by 16 USC §1452 (2)(D), (J), and (F);

- Section VI, Questions #24 through #26 are designed to obtain information about public access, as required by 16 USC §1452 (2)(E);
- Section VII, Questions #27 through #34 seek information about how the program addresses coordination and simplification for expedited governmental decisionmaking, consultation and coordination with federal agencies, and public and local government participation in coastal management decisionmaking, as required by 16 USC §1452 (2) (G), (H), and (I);
- Section VIII, Question #36 is an overarching question about the significant accomplishments and challenges the program had or faced during the evaluation period.

The information request for national estuarine research reserves contains eight sections:

- Section I, Questions #1 through #13 address the administration, operations, management, and facilities of the reserve, as required by 16 USC §1458(a), 16 USC §1461(f)(1), and 15 CFR 921.40(b)(1), (3), and (6);
- Section II, Questions #14 through #17 are designed to obtain information about public access, as required by 16 USC §1458(a) and 15 CFR 921.40(b)(4);
- Section III, Questions #18 through #20 seek information about the reserve's land acquisition activities, as required by 16 USC §1458(a) and 15 CFR 921.40(b)(6);
- Section IV, Questions #21 through #30 request information about the research and monitoring carried out at the reserve, as required by 16 USC §1458(a), 16 USC §1461(f) (1), and 15 CFR 921.40(b)(1) and (2);
- Section V, Questions #31 through #36 elicit information about the educational activities of the reserve, as required by 16 USC §1458(a), 16 USC §1461(f)(1), and 15 CFR 921.40(b)(1) and (3);
- Section VI, Questions #37 through #40 are designed to obtain information about the reserve's Coastal Training Program, as required by 16 USC §1458(a), 16 USC §1461(f) (1), and 15 CFR 921.40(b)(1) and (2);
- Section VII, Questions #41 through #44 address the reserve's responsibilities for stewardship of the reserve resources, including resource protection, manipulation, and restoration, as required by 16 USC §1458(a) and 15 CFR 921.40(b)(1) and (7);
- Section VIII, Question 45 is an overarching question about the significant accomplishments and challenges the reserve had or faced during the evaluation period.

The information request for partners and stakeholders of the CMPs is in the form of a survey and solicits opinions about:

Questions #1, #7, and #12 – general management of the state’s coastal zone, recommendations for improvement, and any other thoughts to share;  
Questions #2, #3, #5, #6 – accomplishments, strengths, weaknesses, and challenges of the CMP;  
Questions #8 and #9 – the effectiveness of, and concerns about, the federal consistency process;  
Questions #9 through #11 – the effectiveness of, and concerns about, the state permitting process in the coastal zone.

All of the opinions and information are being requested to validate information provided by the CMP or provide new information or concerns from an outside perspective.

The information request for partners and stakeholders of the national estuarine research reserves is in the form of a survey and solicits opinions about:

Questions #1, #7 and #8 – addressing priorities of the National Estuarine Research Reserve System, recommendations for improvement, and any other thoughts to share;

Questions #2, #3, #5, and #6 – strengths, accomplishments, weaknesses, and challenges of the reserve;

All of the opinions and information are being requested to validate information provided by the CMP or provide new information or concerns from an outside perspective.

Because each CMP and each research reserve has a unique administrative and programmatic framework to accomplish the requirements of the CZMA, there will be no comparisons or aggregation of information between or among any of the CMPs or research reserves. Even the information in the form of opinions requested from partners and stakeholders for a particular program evaluation will not be aggregated because each coordinates or collaborates with the program from a unique perspective.

The information collected will not be disseminated to the general public but will be used to support the evaluation findings, which are available to the public. NOAA’s Office for Coastal Management will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collected is designed to yield data that meet all applicable information quality guidelines. If NOAA’s OCM should decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

Under this PRA request, the previously used surveys for the national estuarine research reserve and coastal management program stakeholders have been shortened to focus on the key information needed by the evaluation team and to reduce the burden on stakeholders. In addition, several questions were modified to further clarify the information being solicited.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

CMP and research reserve manager respondents will receive information requests via e-mail, and submittals will be made via e-mail. Some of their information request responses will be in the form of existing documents. Other information provided by them may require multi-page responses. E-mail and attachments accommodate these requests more efficiently than a web-based survey tool. Partners and stakeholders of CMPs and of reserves will receive a link to a web-based survey tool (Survey Monkey) and will respond to questions soliciting their opinions through the survey tool. Because these information requests ask for opinions only, these are more easily accommodated by the web-based Survey Monkey.

**4. Describe efforts to identify duplication.**

NOAA is the only agency charged with administering the CZMA and with evaluating the state coastal management programs and national estuarine research reserves pursuant to the requirements of the CZMA for ongoing approval and operation of the programs. No other similar information collections were found.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

The CMP and reserve partners and stakeholders are almost entirely representatives of state, local, regional, or inter-state government agencies or entities, and in some cases, universities and non-governmental organizations. In a few instances, a small business or other small entity might have some interaction with a CMP or research reserve. Those businesses or entities (as well as all other partners and stakeholders) will be asked to complete a questionnaire through a web-based survey tool. Completion of the questionnaire should take approximately 15 minutes, and respondents have approximately 15 days until the deadline for completion.

The survey for CMP and reserve partners and stakeholders has been shortened, reducing the amount of time needed to complete the survey. The number of days the survey is open was reduced as respondents typically fill out the survey during the first two days or the last day the survey.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

NOAA would not be able to determine compliance of a state CMP or research reserve with the requirements of the CZMA and thus could not determine whether program approval and federal financial assistance should be maintained, modified, or withdrawn. If the collection was conducted less frequently, more time could elapse before a serious problem was addressed.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

Not applicable.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.**

A Federal Register Notice published on December 23, 2015 (80 FR 79864) solicited public comments. No comments were received.

The Office also solicited comments on the time, clarity, and usefulness of the stakeholder and partner survey from several stakeholders and partners who completed an evaluation survey. No responses were received. OCM has given careful consideration to how the survey burden could be reduced and in year 2 asked a subset of questions similar in size to the current proposed surveys. OCM was able to conduct an analysis of data in Survey Monkey from year 2 to estimate survey completion in the 10-14 minute range which has been rounded to 15 minutes for ease of calculation.

OCM also received feedback from five CZMA program managers on the information submittal representing reserves, small and large coastal management program, and an island coastal management program. The average burden of completing the information submittal was found to be 71 hours. This is higher than the original 55- hour estimate given by CZMA managers.

For the most part, program managers felt the instructions were clear but a few needed clarification on a question or two and reached out to NOAA who promptly provided clarification.

Program managers were also asked if the information was useful to them. One manager stated yes, two stated they did not anticipate using the information themselves. One manager noted that maybe some of the information requested could be built into performance reporting, another noted that they had included much of the information in prior progress reports and another noted that much of the information could be found in their recently updated Section 309 Assessment and Strategy. One noted that the information was for NOAA and it was up to NOAA to determine the usefulness.

The OCM has carefully considered the value of information collected, whether it could consistently be found in other NOAA information collectors. The OCM made small changes to several questions to reduce the information collected.

To ease the burden of information collection, coastal programs can continue to reference their 309 Assessment and Strategies if the information is there. It should be noted that 309 Assessment and Strategies are updated on a 5-year schedule and although most programs complete them, they are not required and not all programs do.

Unfortunately, OCM cannot rely on progress reporting to provide the information in the information submittal. CZMA funding has remained level over the past 20 years (a reduction of

over 33% in inflation adjusted dollars) and many programs pursue additional sources of funding to support their programs. These activities are not usually reported on to NOAA although many are key to the successful implementation of CZMA programs. In addition, although progress reports track near term outcomes, they do not include information on the long-term impacts of program activities. The information submittal also asks the program to look back and identify the most important impacts and challenges over the evaluation period which is something that isn't captured in semi-annual progress reporting

For both coastal programs and reserves, the information requested and for coastal programs, the 309 Assessment and Strategy, are the documents given to the full evaluation teams which include non-NOAA members, to provide a concise summary of the implementation of the program over the evaluation period.

The OCM also collects performance measure data for both coastal programs and reserves and indicator information through coastal program 309 Assessment and Strategies. This information is incorporated into the evaluation process.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

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

Responses to coastal management program and reserve information requests will not be disseminated or published by NOAA OCM, but a summary of responses to stakeholder surveys will be compiled for the CMP or reserve and the summary will be available to the public upon request. However, respondent names will not be linked to survey results when surveys are conducted.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No sensitive questions are asked.

**12. Provide an estimate in hours of the burden of the collection of information.**

With a total of 62 approved CMPs and research reserves, and in order to evaluate a single program once every five to six years, 12 individual programmatic evaluations will need to be conducted each year. Each year, 12 different CZMA managers will need to respond to the information request, and an average of 35 partners and stakeholders per program will be asked to provide information. Thus, the estimated number of respondents is 432 annually (12 CZMA program managers; 420 partners and stakeholders [35 per CZMA program]).

Based on the feedback of three CMP managers and two reserve managers who recently completed the information submittal, the average estimated time per response is 71 hours per CZMA program manager.

There are two points worth noting about the 71-hour response time for a manager. First, although 12 managers will respond to the information request each year, a single CZMA program manager will only have to respond once every five to six years. On an annualized basis for one manager, this is a burden of approximately 12-14 hours.

<b>Number of Respondents x Hours x Responses/Year</b>	<b>Annual Burden Hours</b>
1) 12 respondents x 71 hours x response/year CMP and Reserve managers completion of information submittal	852 hours ( <i>previously 715 hours based on 13 respondents x 55 hours x 1 response/year</i> )
2) 420 respondents x 15 minutes x 1 response/year	105 hours, ( <i>previously 227.5 hours based on 455 respondents x .5 hours x 1 response/year</i> )
<b>Annual Totals: 432 responses</b>	<b>957 hours</b> ( <i>previously 942.5</i> )

In 2015, OCM sent a shortened version of the approved surveys to stakeholders and participants. The shortened surveys are the same size as the revised surveys being submitted for approval under the Paperwork Reduction Act. Based on an analysis of the time taken by CMP and reserve stakeholders in 2015 to complete the surveys, the estimated time per response for the stakeholder survey is 15 minutes.

Each coastal management program and reserve that is scheduled to be evaluated in that year will include a task in its cooperative agreement award that will allow the program to expend award funds toward the participation in and completion of its programmatic Section 312 evaluation.

Respondents are likely to be program managers, department heads, and content area specialists within their respective organizations – both within the CZMA programs and within the partners’ and stakeholders’ organizations. Although there are broad salary ranges by state, regionally, and by type of agency and organization, the average salary is equivalent to a Government Service Pay Grade 12, Step 1 basic hourly rate of \$33.75.

<b>Number of hours x hourly wage</b>	<b>Estimated Cost</b>
852 respondent hours x \$33.75 wage	\$28,775 ( <i>previously \$20,649 based on 715 hours x \$28.88</i> )
105 respondent hours x \$33.75	\$3,544 ( <i>previously \$1819 based on 63 hours x \$28.88</i> )
<b>Annual Total Cost</b>	<b>\$32,319</b> ( <i>previously \$22,468</i> )

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

There is no reporting or recordkeeping cost burden for the respondents.



**14. Provide estimates of annualized cost to the Federal government.**

This information collection effort is supported through in-house staff time. The OCM will conduct approximately 12 evaluations per year. One evaluator will conduct five evaluations per year, so 2.4 evaluators are needed annually to complete 12 evaluations. The OCM program specialist assigned to work with each CZMA program being evaluated will also participate in the evaluation process, so 12 program specialists will be involved annually.

Currently evaluators are primarily CAPS ZA-3 and ZA-4 salaried employees at various pay intervals. Evaluators are presumed to be salaried at the beginning point of the CAPS ZA-4, Interval 1 scale for the Washington DC region at \$90,823 or \$44.66 per hour. Based on the average of estimates by program evaluators serving on the CZMA Evaluation Workgroup, an evaluator spends approximately 330 hours on a single evaluation.

Program specialists are primarily CAPS ZA-3 and ZA-4 salaried employees at various pay intervals. OCM program specialists are presumed to be salaried at the beginning point of the CAPS ZA-4, Interval 1 scale \$90,823 or 44.66 per hour. Based on the average of estimates by program specialists serving on the CZMA Evaluation Workgroup, a specialist spends approximately 60 hours of involvement for a single evaluation.

Regional representatives from NOAA participate in the evaluation. These are usually managers and primarily Levels ZA-4 and ZA-5. Regional representatives are presumed to be salaried at the beginning point of the CAPS ZA-5, Interval 1 scale at \$126,245 or \$60.69 per hour. The regional representative spends approximately 24 hours of involvement for a single evaluation.

Every evaluation now includes a site visit; most site visits are 2.5 days. This change from visits to only 2 sites per year was made at the request of state programs. For each site visit, an evaluator, the program specialist, and regional representative from NOAA participate. It is assumed in about half the evaluations, there will be no need for travel. Assuming an average of \$2,000/person for a 2.5 day site visit with two or three people, travel will cost approximately \$60,000.

**ANNUALIZED COST**

<b>Personnel and Travel</b>	<b>Cost</b>
1) 12 evaluations x 330 hours x \$44.66 wage for evaluator	\$176,854 for evaluators ( <i>previously 13 evaluations x 330 hours x \$43.27 = \$185,628.30</i> )
2) 12 evaluations x 60 hours x \$44.66 wage for site liaison	\$32,155 for site liaisons ( <i>previously 13 evaluations x 60 hours x \$43.27 = \$33,750.60</i> )
3) 12 evaluations x 24 hours x \$60.69 wage for regional representative	\$17,478 for regional representatives ( <i>previously not included</i> )
4) 12 evaluations x 2.5 personnel x \$2,000 cost	\$60,000 ( <i>previously 2 evaluations x 2.5 personnel x \$1000</i> )
<b>Total Cost:</b>	<b>\$209,009</b> ( <i>previously \$237,324</i> )

The entire evaluation process will be implemented electronically, with no administrative staff support, printing, or supply costs.

**15. Explain the reasons for any program changes or adjustments.**

The OCM has not conducted more than 12 evaluations per year in the past three years and will continue to conduct 12 or fewer for the next three years. The previous PRA request used an estimate from program managers for completing the information submittal, as it was a new form and no manager had experience in completing the form. Based on feedback from five CZMA managers who have now completed the information submittal, the average was 71 hours to complete the information submittal. The time estimate has been modified to use 71 hours as the estimated time to complete the information submittal.

For the survey of stakeholders, the scope of questions has been reduced by 4 questions for the reserve survey and 9 questions for the coastal program surveys. The surveys have been shortened so that respondents and OCM can focus on the questions that provide the most useful information while reducing the time burden for survey respondents. In addition, the questions remaining in the survey are of a more general nature and respondents can answer without providing identifying information if they so choose.

Due to the reduction in the scope of the survey, the estimated time to complete the survey has been reduced to 15 minutes, from 30 minutes. The estimate is based on a similar shortened survey to solicit feedback from partners and stakeholders used in 2015.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The collection results will not be published.

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

Not applicable; not seeking approval.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement identified in Item 19.