

Supporting Statement A

Cape Lookout

National Seashore Cultural Resource Values and Vulnerabilities Assessment OMB Control Number: 1024-NEW

Terms of Clearance: None. This is a new collection.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection

The National Park Service (NPS) managers at Cape Lookout National Seashore (CALO) are currently developing cultural landscape plans that will include climate adaptation strategies for the structures and cemeteries located within the park's two historic districts (Portsmouth Village and Lookout Village). CALO managers are particularly challenged by the potential risk of damage to historic structures and other cultural resources in coastal park units from storm surges, rising sea levels, and shoreline erosion near these areas. In the past, buildings have been inundated by floodwater and tidewater, and, changing coastlines are currently threatening some of the local structures.

The structures within the park's two historic districts were fiscally managed and maintained under a historic leasing agreement that expired in 2014. The expiration of the agreements results in added fiscal challenges for the Park. CALO managers and planners are now responsible for prioritizing resources for preservation projects and determining the appropriate adaptation strategies based on the significance and vulnerability of the historic landmarks. The management of the cultural resources range from fully restored stabilization in its current condition. This information collection has been requested by managers to help understand the public's and stakeholder's perception of the cultural and social values of the landmarks. There has never been an assessment of this type to support management decisions. Public input is an important element of successful cultural resource planning efforts.

Legal Justifications for this collection:

The National Park Service Act of 1916 (54 U.S.C. 100701.)

The National Park Service (NPS) is required to preserve the national parks for the use and enjoyment of present and future generations. At the field level, this means resource preservation, public education, facility maintenance and operation, and physical developments that are necessary for public use, health, and safety.

The National Historic Preservation Act of 1966 (54 U.S.C. § 300101)

It is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to... administer federally owned, administered, or controlled historic property in a spirit of stewardship for the inspiration and benefit of present and future generations;

The Antiquities Act (54 U.S.C. 3000101)

Established the first national historic preservation policy for the United States (Lee 1970:1 ff.) Section 2 of the statute gives the President the authority to set aside for protection "...historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Government of the United States..." These protected areas were then designated as "national monuments" and the federal agencies assigned to oversee them were required to afford proper care and management of the resources.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

National Historic Landmarks (NHLs) are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. The managers and planners at CALO are required to develop plans that will be used to meet the Secretary's standards to preserve and rehabilitate historic buildings. These standards have been established to promote historic preservation that will protect our nation's irreplaceable cultural resources.

In addition to using the standards and guidelines to carry out their historic preservation responsibilities, CALO managers and planners are interested in obtaining knowledge regarding the level of understanding and awareness held by experts and partners have concerning the guidelines when planning for weather (or potential climate) related changes to the structures. The following standards were used as the basis for developing the survey questions used in this collection.

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*
2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*
3. *Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*
4. *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*
5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*
6. *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*
7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*
8. *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*
9. *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*
10. *New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The information gathered in this collection will be used to assess:

- current interests in cultural resource management and decision-making at CALO;
- personal connections to the historic landmarks of the site;
- reactions to hypothetical climate change scenarios;
- how cultural resource associations change over time; and
- perceived (or actual) cultural resource planning challenges

Finally, the data will be used by CALO managers as they develop their Resource Stewardship Strategy to meet its obligation to define the actions they use to preserve its natural and cultural resources over the next 3 years

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 and specifically how this collection meets GPEA requirements.**

An on-line survey will be hosted and administered by researchers at North Carolina State University. No servers or computers owned or managed by the National Park Service or any other government agency will be used to collect or store the information from this survey. Qualtrics be used will facilitate the administration, data collection, and statistical analysis of the completed surveys. The

questionnaires are designed to be completed electronically.

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 is no known duplication of efforts.

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

This collection does not impact any small business or small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This is a one-time collection. This survey was requested because CALO has over 8 million dollars in needed improvements and repairs to cultural resources located in a harsh, changing landscape, and less than \$200,000 in annual discretionary spending to dedicate to the resources; thus, the Park recognizes the need to be highly strategic in the distribution of limited funds. The disparity is considered to be extreme and any failure to select the right projects could mean failure to accomplish its preservation mission.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- * **Requiring respondents to report information to the agency more often than quarterly;**
- * **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * **requiring respondents to submit more than an original and two copies of any document;**
- * **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- * **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;**
- * **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * **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; or**
- * **requiring respondents to submit proprietary trade secrets, 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 request contains no special circumstances with the exception of item 2 above. The Expert Survey and the Partner Survey will request that participants complete the survey within 30-days of initial contact.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The *Federal Register* notice requesting comments was published on May 21, 2015 (80 FR 29334). The notice announced that we would submit this information request to OMB for approval. In that notice we solicited public comments for 60 days, ending July 20, 2015. We did not receive any comments as a result of that *Federal Register* notice.

In addition to our *Federal Register* notice, we solicited comments from the NPS Climate Change Adaptation Coordinator for Cultural Resources, the NPS National Climate Change Adaptation Coordinator, and the NPS SER Climate Change, Socioeconomics, and Adaptation Coordinator, as well as a social scientist at the University of Minnesota. We modified the original instrument based on that feedback, adding and deleting questions, as well as rephrasing some questions to enhance clarity and reduce respondent burden.

We pre-tested the partner survey with six graduate students from North Carolina State University, which not only provided us with estimates of mean completion time of 13 minutes; but also provided us with additional strategies to reduce burden. For example, suggestions were made to split the place connections measures into two separate sets of questions (Q1 and Q2), and we added definitions to the cultural resource values (Q3) and threats (Q7).

We also had an additional review of the final Expert Survey instrument, which was performed by 2 historic preservation experts and their review supported our decision to include the evaluation of five

structures per survey. The selection of five structures represented the lower end of the feedback we received (one recommended five and one recommended ten structures) and our decision to limit burden to less than one hour per respondent (based on an estimated 10 minute per structure review; this time was determined to be sufficient to fully consider the historical aspects of a structure and the potential vulnerability of that structure before applying judgments of adaptation strategies). Additionally, we modified the survey instrument based on the feedback we received, including clarification of question wording (parenthetical material added to Q12 items), adding one question to increase the comprehensiveness of prioritization strategies (Q12n), increasing the amount of contextual information provided for each structure to be evaluated, and a two grammatical edits. We pre-tested the expert survey to confirm its completion time to be 45 minutes.

Names and contact information of individuals requested to review the survey instruments.

1. Marcy Rockman, NPS Climate Change Adaptation Coordinator for Cultural Resources
1201 Eye St. NW, Washington, DC 20005
email: marcy_rockman@nps.gov
2. Cat Hawkins Hoffman, NPS National Climate Change Adaptation Coordinator
1201 Oakridge Drive Fort Collins, CO 80525
email: cat_hawkins_hoffman@nps.gov
3. Janet Cakir, Ph.D., NPS SER Climate Change, Socioeconomics, and Adaptation Coordinator
South Atlantic Landscape Conservation Cooperative
1751 Varsity Dr.
Raleigh, NC 27606
email: janet_cakir@nps.gov
4. Mae A. Davenport, Ph.D., Associate Professor, Department of Forest Resources and Director,
Center for Changing Landscapes
University of Minnesota
115 Green Hall 1530 Cleveland Ave. North
St. Paul, MN 55108-6112
Email: mdaven@umn.edu
5. Beth Byrd, Director
Washington Harbor District Alliance National Trust for Historic Preservation
PO Box 1988
Washington, NC 27889
Email: whda@washingtononthewater.com
6. Matthew Booker, Ph.D., Associate Professor, Department of History
NC State University Withers Hall 274
Raleigh, NC 27695
Email: mmbooker@ncsu.edu
7. Cynthia Walton, NPS Historian
100 Alabama Street, SW 1924 Building
Atlanta, GA 30303
Email: Cynthia_Walton@nps.gov

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There are no payments or gift giving associated with this collection.

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

We will conduct this work in accordance with the Paperwork Reduction Act and under the guidance of the National Park Service. We will not provide any assurances of confidentiality, however all response will be anonymous. The respondents' name and the responses will never be associated within the context of the survey results or in any reports or presentations. Any personal information used to collect this data will only be used for the purposes described herein and will be destroyed immediately following the close of the sampling period. Any databases containing all contact information will be completely destroyed at the completion of the study.

Both partner organizations have agreed contact their membership concerning this collection. They have also agreed to assume the responsibility of administering the surveys for this study using their membership roster. The NPS and members of this research team will not have direct access to the membership rosters.

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. 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.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **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 desirable. 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.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."**

This is a one-time collection that will involve two separate samples: Partners and Experts. We intend contact total of 480 potential respondents (400 Partners and 80 Experts). For the Partner Survey we anticipate a 40% response rate or 160 completed responses; this estimate is based on a 2012 Friends of the National Park survey conducted by the National Park Foundation¹; and for the Expert Survey, We anticipate a 40%² response rate (n=32). The total burden for this collection is estimated to be 65 hours.

The non-response bias survey for both partners and experts is expected to take about one minute to this includes the contact time and completion. The total anticipated burden to administer the both non-response is estimated to be no more than 2 hours combined.

Table 1: Estimated Annual Burden Hours

Activity	Number of Responses	Completion Time (minutes)	Total Burden (hours)
Partner Survey			
<i>Initial contact and Completed Responses</i>	160	15	40
<i>Non-response Survey</i>	20	1	<1
	180	19	40
Expert Survey			
<i>All contacts and Completed Responses</i>	32	45	24
<i>Non-response survey</i>	48	1	1
	80	46	25
Total		65	65

We estimate the total dollar value of the burden hours to be \$2,730. We multiplied the estimated burden hours by \$33.58 (partner survey) and \$55.47 (Management/Professionals completing the expert survey). This wage figure includes a benefits multiplier and is based on the National Compensation Survey: Occupational Wages in the United States published by the Bureau of Labor Statistics Occupation and Wages, (BLS news release USDL-16-0463 for Employer Costs for Employee Compensation— December 2015 at - <http://www.bls.gov/news.release/ecec.nr0.htm>).

Table 2: Estimated Dollar Value of Annual Burden Hours

¹ Partner organization response rate estimate: <http://www.nationalparks.org/sites/default/files/kcfinder/files/2012%20Friends%20of%20the%20Parks%20Report.pdf>.

² This estimate is based on an expert study conducted by the PI; see: Moss, H. N., Seekamp, E., & Sparling, D. W. (2013). Assessing the Necessity of a Wildlife Toxicology Certificate: A Survey of Professional Perceptions. *Human Dimensions of Wildlife*, 18(1), 68-80. We used the response rate for the Delphi process aspect of that study (46%) given the time commitments were similar for the Delphi process (estimated burden of 1.15 hours) of that study and the present Expert Survey; the expert survey in that study has a 67% response rate but only took 20 minutes to complete.

Activity	Total Annual Burden Hours	Dollar Value of Burden Hours (including benefits)	Total Value of Annual Burden Hours
Partner Survey	40	\$33.58	\$1,343
Expert Survey	25	\$55.47	\$1,387
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13. Provide an estimate of the total annual non-hour cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

There are no non-hour costs associated with this collection.

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 not have been incurred without this collection of information.

The total cost to the federal government is estimated to be \$85,786. This includes the federal salaries and benefits (Table 3) and the indirect costs incurred by NC State University to conduct this study. This includes the expenses necessary for management, data collection, analysis, and report writing (Table 4).

Table 3. Federal Employee Salaries and Benefits

Position	Grade/ Step	Hourly Rate	Hourly Rate incl. benefits (1.5 x hourly pay rate)	Estimated time (hours)	Cost per federal staff (Hourly Pay Rate incl. Benefits)
NPS CCCR Coordinator	GS14-4	\$57.39	\$86.09	3	\$258
NPS Historian	GS12-2	\$36.32	\$54.30	3	\$163
TOTAL					0

Table 4. Operational Expenses

Operational Expenses	Estimated Cost
Salaries and Benefits	\$62,691
Researchers	\$5,200
Research Assistants	\$42,915
Temporary Help	\$14,576
Materials and Supplies	\$1,011
Travel	\$21,663
Total	0

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

This is a new request.

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.

For both surveys, data analysis and reporting will include content analysis, frequency distributions and descriptive statistics. Factor analysis will be used to create measurement indices of place connections measures. Analysis of variance will be used to compare stakeholder groups’ responses to place connections measures. Multivariate analysis of variance and multiple regression will be used to assess for differences in opinions between members of partner organizations with differing levels of place connection. Heat maps will be created to visualize the convergence of experts’ opinions of vulnerabilities, significance and management strategies from the PGIS exercise.

The final deliverables will include a comprehensive report to the park, newsletter with case study delivered to the NPS, manuscript to scientific peer review journals and/or professional meetings. Total time anticipated to work on this project is 12 months (Table 4).

Table 4. Project Timeline

	1st Quarter Oct-Dec 2016	2nd Quarter Jan-Mar 2017	3rd Quarter Apr-Jun 2017	4th Quarter Jul-Sep 2017
Partner survey	X			
Expert Survey	X			
Data analysis	X	X	X	
Final report to the park				X
Newsletter to the NPS				X
Manuscript preparation & submission to journal				X

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

We will display the OMB control number and expiration date on the information collection instruments.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.