SUPPORTING STATEMENT NATURAL RESOURCE DAMAGE ASSESSMENT RESTORATION PROJECT INFORMATION SHEET OMB CONTROL NO. 0648-0497

A. JUSTIFICATION

1. Explain the circumstance that make the collection of information necessary.

This request is for extension of a current information collection.

The purpose of the collection of this information is to assist state and federal Natural Resource Trustees in more efficiently carrying out the restoration planning phase of Natural Resource Damage Assessments (NRDA), in compliance with the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. 4321-4370d; 40 CFR 1500 and other federal and local statutes and regulations as applicable. Currently, when a release or substantial threat of release of oil or hazardous substances occurs and a NRDA is conducted, state and federal Natural Resource Trustees carry out three phases: pre-assessment, restoration planning, and restoration implementation. Traditionally, the restoration planning phase is time-consuming and expensive because Trustees must contact numerous government agencies, as well as private groups, nongovernmental organization and non-profit organizations to develop a list of restoration project alternatives for each incident, a requirement before selecting suitable projects(s) to compensate the public and environment for lost services and resources. Restoration project information sheets facilitate the collection of information on a continual basis, thereby markedly shortening the time needed to generate a list of restoration alternatives following each incident. By reducing the time needed to conduct the restoration planning phase of a NRDA, the entire NRDA process becomes more efficient and habitat restoration projects will be implemented sooner.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collection will 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.

The purpose of the NRDA Restoration Project Information Sheet is to collect information on existing, planned, or proposed habitat restoration projects in a localized region. The NRDA Restoration Project Information Sheet will be provided in several formats to facilitate the information collection needs of the following programs: 1) the Louisiana Regional Restoration Planning program, and 2) National Oceanic and Atmospheric Administration (NOAA) Damage Assessment Remediation Restoration Program. The information sheet will be available in an online submission format, a fillable, trackable PDF format, and a hard copy format. Both electronic formats can facilitate NRDA restoration planning process, as they can feed directly into a database and provide for robust data management purposes.

The various formats for the NRDA Restoration Project Information Sheet will collect the same information, which includes:

- (a) Contact Information Basic details necessary to identify and contact project managers such as name, title, address, organization, city state, zip code, phone and fax numbers, e-mail and URL for Web sites.
- (b) Project Information Basic project information such as the project title, size, cost, and details on the physical location of the project site including Parish/County, watershed, and latitude/longitude.
- (c) Project Categories Respondents have the opportunity to provide categorical identifications of project types, habitats, and resource benefits to easily describe projects.
- (d) Project Status Basic information indicating the status of certain phases of the project, such as resource acquisition, planning/design, and permitting.
- (e) Description and Benefits A detailed description of the project with background on the site as well as other potential benefits.
- (f) Project Partners Details on support (e.g., planning, funding, technical assistance) provided by other organizations including partner name, contact information, and involvement.

The information collected from these forms will be used by NOAA staff and other federal and state agencies to populate a database on an ongoing basis. Following the release or substantial threat of release of oil or hazardous substances (hereafter referred to as incident), NOAA staff and other state and federal agencies may query the database to identify potential restoration projects suitable for compensating the public and environment for the loss of services and/or resources as a result of the incident.

Queries related to the Deepwater Horizon Oil Spill for potential projects may also be made by non-profit organizations and members of the public. The information collected by the NRDA Project Information sheets related to the Deepwater Horizon Oil Spill is available to the public on-line at http://www.gulfspillrestoration.noaa.gov/. The frequency of queries by agencies, organizations, and the general public will depend on the number of incidents or interest in habitat restoration.

NOAA Fisheries 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 Question 10 for information about confidentiality. The information collection is designed to yield information that meets all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanic, or other technological techniques or other forms of information technology.</u>

The Natural Resource Damage Assessment Restoration Project Information Sheet will be provided to government agencies, private organization, non-governmental organizations, and the general public as a hard copy and is also available on the internet at http://www.losco.state.la.us/, http://www.gulfspillrestoration.noaa.gov/, and http://www.darrp.noaa.gov/. The form may be populated on a personal computer (if desired); however, while electronic submission of the information is allowed, it is not required. The NRDA Information Sheet is available as a webbased fillable form that can be submitted online or saved and used to produce subsequent project submissions.

4. Describe efforts to identify duplication.

There are no other collections that gather similar information. No duplication of efforts exists with other Federal Government information collection efforts.

5. <u>If the collection of information involves small business or other small entities, describe</u> the methods used to minimize burden.

The information to be collected is very basic in its nature and should not be a hardship or burden for small entities to produce. A pre-formatted PDF of the data fields is provided to assist in the collection of information prior to being entered into the database. Separate requirements based on the size of the business or entity have not been developed.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.</u>

This information is critical to pursue cost-effective planning and implementation of restoration projects. Without this information, the Trustees would need to independently request project submission ideas which could take a significant amount of time and resources.

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 the 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 <u>Federal Register</u> Notice (FRN) published on October 31, 2016 (81 FR 75384) solicited public comment on this renewal request.

In addition, NOAA consulted with members of the Deepwater Horizon NRDA Trustee Council, which consists of four other federal agencies (in addition to NOAA), including the Department of Interior, Department of Defense, Department of Agriculture, and United States (U.S.) Environmental Protection Agency and five states, Alabama, Florida, Louisiana, Mississippi, and Texas, requesting feedback on the NRDA Restoration Project Information Sheet. Specifically, feedback was sought on their views on the burden associated with the information collection, availability of data, data elements, and clarity of instructions.

Two respondents replied with "no comment" and did not have any critiques of the NRDA Restoration Project Information Sheet. Two respondents provided feedback about our program in general, but did not provide specific feedback about use of the form. A fifth respondent concurred with the burden estimates and stated overall support of the NRDA Restoration Project Information Sheet, noting that this collection method is much simpler to use than other outside methods employed by non-NOAA groups. This respondent requested the term "land acquisition" in the "project type" section of the form be defined. As the term is already defined in the instructions, NOAA directed the respondent to the existing definition.

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

No payments, gifts, or other remuneration will be provided.

10. <u>Describe any assurance of confidentiality provided to respondents and the basis for assurance in statue, regulation, or agency policy</u>.

The information collection does not request any proprietary or confidential information. No confidentiality is provided.

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

No questions of a sensitive nature are asked.

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

The three-year burden for this collection is estimated to be 90 hours (annualized to 30 hours) as detailed below. It is estimated that approximately 47 respondents will annually submit completed Natural Resource Damage Assessment Restoration Project Information Sheets with each respondent submitting an average of 1 to 2 Information Sheets for individual projects. It is estimated that approximately 90 annual responses will be received. At an estimated response time of 20 minutes each, this yields an estimate of 30 burden hours. Respondents can update their project submission any time once it has been entered into the database. It is expected that approximately 49% of submissions will be updated annually (44). At an estimated response time of 10 minutes each, this yields an estimate of 7 burden hours. Estimated total responses, burden hours and costs for this collection will be 134 responses, 37 hours and \$787.73 in labor costs annually (based on an average hourly wage of \$21.29 [U.S. Dept. of Labor, 2010*]), respectively.

It is expected that 90% of responses will be through the web-based data entry form. However, it should be noted that the restoration project information collected is intended to provide information to restoration practitioners throughout the areas of collection, including those submitting the data. Therefore, the burden of data collection is expected to be offset (and in some cases exceeded) by the benefits accrued to restoration practitioners from having access to project information.

*U.S. Department of Labor – Bureau of Labor Statistics. 2010. National Compensation Survey: Occupational Wages in the United States, May 2-11. Bulletin 2753 http://www.bls.gov/ncs/ncswage2010.pdf

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

No capital or start-up costs are expected to result from this collection by the respondents. Operations and maintenance costs are expected to be limited to Internet and computer access. It is expected that existing computer equipment and Internet connections will be used by respondents at little to no additional cost. Furthermore, it is expected the majority of respondents will submit the NRDA Project Information sheet using the web-based data entry form. If the information is submitted via electronic mail, this collection will incur no cost burden on respondents beyond the costs of response time. It is expected that no more than 10% of respondents will either use facsimile transmission or mail to submit paper data entry forms. Based upon this percentage, it is estimated half of those aforementioned respondents will use mail, resulting in a \$2.35 burden (5 respondents x \$0.47 per stamp), and the remainder of those respondents will use facsimile transmission, resulting in a \$15 burden (5 respondents x \$1.00 per page, averaging 3 pages per fax). The overall annual burden to respondents is \$17.35 (\$18).



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

One full-time employee (FTE) will devote approximately 10% of his/her time annually for oversight, QA/QC, and data imports. One contractor will devote 10% of his/her time to implement changes and maintain the application. With an annual average salary of \$80,000 for an FTE at 10% time (\$8,000), and an annual salary for a contractor of \$75,000 at 10% time (\$7,500), the annualized cost to the Federal government to conduct this information collection is estimated to be \$15,500. No significant equipment, overhead, printing or other costs should be involved with the processing of this information collection.

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

A significant reduction in the estimates of hours and burden is a result of variable use patterns that depend on the size and scale of cases for which submission are being solicited. The previous renewal period included a very large case that significantly elevated numbers of responses. Since that time response rates have returned to previous baseline estimates.

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

All data collected will be available in table form which provides a basic project description or on the internet. Proposed projects which include latitudinal and longitudinal coordinates are displayed on a map and project list. Projects which did not include the aforementioned detail are only available to view from the project list. Tabulation project descriptions include title of project, state, county/parish, and link to view the data collected from the Natural Resource Damage Assessment Project Information Sheet.

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

Not Applicable.

18. Explain each exception to the certification statement.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.