

**SUPPORTING STATEMENT
FOR
DRAWBRIDGE OPERATIONS**
OMB Control No.: 1625-0109
Collection Instruments: Instruction.

A. JUSTIFICATION

1. Circumstances which make the collection of information necessary.

Under the provision of 33 U.S.C. 499, the Secretary of Homeland Security is mandated to prescribe rules and regulations for governing the closures of drawbridges to navigation. This authorization was delegated to the Commandant of the Coast Guard under Department of Homeland Security Delegation number 0170.1 and the drawbridge operating regulations are set out in 33 CFR Part 117. To change any regulation, 5 U.S.C. 553 requires rule making to be published in the Federal Register and that the notice shall include a statement of time, place, and nature of public rule making proceedings. The information needed for the change to the rule can only be obtained from the bridge owners. The information collection requirements are contained in 33 CFR 117.8, 117.35, 117.39, 117.40, 117.41 and 117.42.

This information collection supports the following strategic goals:

Department of Homeland Security

- Safety
- Mobility
- Economic Growth and Trade
- Human and Natural Environment
- National Security

Coast Guard

- Safety
- Maritime Security
- Protection of the Natural Resources
- Mobility
- National Defense

2. Purpose of the Information Collection

The information is provided to the Coast Guard in a written format, from the bridge owner, making the request to alter the operating schedule for a particular bridge or bridges. The frequency of requests is dependent upon the number of events that occur involving the need for a change in the schedule of the bridge.

This information is used by the Coast Guard to:

- 1) Determine if the request to change the operating schedule for the drawbridge is necessary.
- 2) Coordinate the change in operation with the bridge owner and waterway users.

- 3) Notify the public and navigational community of the change to the operating schedule; i.e. date, time, length of closure periods, and reason for closure.

3. Consideration of the use of improved information technology to reduce the burden.

The information being collected will be used in executing an action required by law. The nature of the information requested is case-specific and requires a written request for each change.

We estimate that 100% of the requests can be submitted electronically (fax or e-mail). However, at this time we receive most of the requests by letter.

4. Efforts to identify duplication.

There is no other Federal agency with similar programs concerning bridges over navigable waters of the United States and her territories. The responsibility for bridges over navigable waters of the United States rests solely with the Coast Guard. There is no similar information available, which could be used or modified for this purpose. Each collection is specific and unique to a specific bridge.

5. Methods used to minimize the burdens to small business.

This information collection does not have an impact on small businesses or other small entities. Most bridge owners comprise State governments and Local municipalities, as well as Railroads companies. In order to minimize the impact to small business, there is no predefined length or format required to make a request.

6. Consequences to the Federal program if collection were not done or conducted less frequently.

Legally, a drawbridge owner cannot alter their operating schedule(s) unless authorized by the District Commander. Without notification that the bridge owner intends to alter the operating schedule of a drawbridge, the owner would be in violation of the law and the Coast Guard could not coordinate with the waterway users. A change in schedule of drawbridge operations can have a significant impact on recreational and commercial waterway use.

7. Special circumstances that require collection to be conducted in an inconsistent manner.

This information collection is conducted in manner consistent with the guidelines in 5CFR 1320.5(d)(2).

8. Solicitation of Comments.

Unless notice is given under a 180 day temporary deviation, a 60-day Notice is usually published in the Federal Register requesting comments from the public.

9. Provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection. Neither applicants nor respondents to public notices on bridge projects are compensated for providing data or information.

10. Assurances of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection. Bridge regulatory case records are public records and subject to applicable provisions of Title 49 Code of Federal Regulations Part 7, Public Availability of Information Transportation (49 CFR 7). (From COMDTINST M16590.5C, Bridge Administration Manual, paragraph 1.M.2.). Also, all comments are posted to the rule making docket for the action which is publically available through the Office of the Federal Register website at www.regulations.gov

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive nature.

12. Estimate of annual hour and cost burden.

Nationwide, approximately 20,000 bridges over the navigable waters of the United States and her territories are primarily owned by State governments, Local municipalities, and Railroad companies. The Bridge Administration receives approximately 150 requests from bridge owners or the general public per year to authorize changes to general or specific drawbridge regulations. The estimated "annual hour burden", nationwide is therefore approximately 150 hours (1 hour per request). This burden estimate is based on the length of time it takes to generate a letter containing the required information for the requested change, to the District Bridge Administrator. The letter is prepared by someone at the clerical level, equivalent to a (GS-7). Therefore, we estimate that the average annual cost to prepare 150 letters with a change of request would be \$6,900, as described below:

PERSONNEL	PER REQUEST			TOTAL (PER YEAR)		
	Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
Clerical Level equivalent to (GS-7)	\$46	1	\$46	150	150	\$6,900
TOTALS		1	\$46	150	150	\$6,900

*Based on hourly rates for government personnel in Enclosure (2) to COMDTINST 7310.1R.

13. Provide an estimate of the annualized capital/start-up costs to respondents.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection. (See Items 12 and 14)

14. Estimates of annualized cost to the Federal Government.

Based on district experience, each request requires a total of approximately 7.5 hours to process —5 hours for District Bridge personnel (GS-12) and 2.5 hours for Legal personnel (O3/GS-14). With the average annual total of approximately 150 requests per year, the resulting man-hours per year are 1,125 (7.5 x 150) for all district bridge offices that review the requests. Thus, the

estimated annual costs to the Coast Guard for processing 150 requests are \$84,450, as described below:

PERSONNEL	PER REQUEST			TOTAL (PER YEAR)		
	Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
District Bridge/USCG (GS-12)	\$71	5	\$355	150	750	\$53,250
District Legal/USCG (O3)	\$79	2	\$158	150	300	\$23,700
HQ Legal/USCG(GS-14)	\$100	0.5	\$50	150	75	\$7,500
TOTALS		7.5	\$563	150	1,125	\$84,450

*Based on hourly rates for government personnel in Enclosure (2) to COMDTINST 7310.1R.

15. Reason for changes or adjustments in the burden.

The amount of burden for time has not changed. The changes in cost are based on; 1) the changes in hourly rates from 2014 to 2017 for the respondents' employees and those of the Federal Government and 2) there is a correction to the overall cost due to a mathematical error in the 2014 Supporting Statement. This error occurred in the "District Legal/USCG (O3)" line. The total cost per request was multiplied by the total hours per year vs. the number of requests which over exaggerated the total cost for District legal review. The correct calculation in the 2017 Supporting Statement reduces the annualized cost to the Federal Government.

16. Plans for tabulation, statistical analysis and publication.

USCG does not intend to employ the use of statistics or the publication thereof for this information collection.

17. Approval for not to explain the OMB expiration date.

USCG will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement.

USCG does not request an exception to the certification of this information collection.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This section does not apply because the collection of information does not employ statistical method.