

**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 zone management programs (CMPs or coastal programs) 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 coastal programs 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 coastal programs and 29 research reserves and produces written findings for each evaluation. Each coastal program and research reserve will be evaluated (and therefore need to provide information pursuant to this collection request) approximately once every five (5) to (6) years. Partners and stakeholders of a program and research reserve being evaluated will also be asked to provide information during the same timeframe. Partners and stakeholders include federal government, state government, regional government entities, local government, non-governmental organizations, non-profit organizations, academia, and business and industry representatives.

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. Performance reports provide information on tasks funded with federal funds and the completion of tasks. However, additional information from each coastal program and research reserve, as well as information from partners and stakeholders with whom each works, is necessary to evaluate against statutory and regulatory requirements. For example, performance reports do not include information on initiatives and projects that are funded with non CZMA funds, long-term outcomes of initiatives and projects outside the federal award period, and emerging coastal management issues, challenges, and opportunities. Different information collection subsets are necessary for 1) coastal programs, 2) research reserves, 3) partners and stakeholders of coastal programs, and 4) partners and stakeholders of research reserves.

No changes are proposed to the questions for the information submittals for coastal program and research reserve managers. Previously the information submittals for coastal program and research reserve managers were submitted for approval as a combined document. In practice, coastal program managers answered questions regarding coastal programs and reserve managers answered questions related to reserves. The surveys are being included as separate documents in this submittal.

For the survey of stakeholders/partners, the scope of questions has been reduced by one (1) question for both the research reserve and coastal program stakeholder/partner surveys. 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. The order of a few questions were also shifted. In addition, minor changes in wording have been made to the introduction and several questions to provide more clarity.

The information requests, included in this submission, for coastal programs 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 coastal program 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 decision making, consultation and coordination with federal agencies, and public and local government participation in coastal management decision making, 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 coastal programs is in the form of a survey and solicits opinions about:

- Questions #1, #10, and #11 – general management of the state's coastal zone,

- recommendations for improvement, and any other thoughts to share;
- Questions #2, #3, #4, #5 – accomplishments, strengths, weaknesses, and challenges of the coastal program;
- Questions #6 and #7 – the effectiveness of, and concerns about, the state permitting process in the coastal zone.
- Questions #8 and #9 – the effectiveness of, and concerns about, the federal consistency process;

All of the opinions and information are being requested to validate information provided by the coastal program 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, #6, and #7 – addressing priorities of the National Estuarine Research Reserve System, recommendations for improvement, and any other thoughts to share;
- Questions #2, #3, #4, and #5 – strengths, accomplishments, weaknesses, and challenges of the reserve;

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

Because each coastal program 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 coastal programs or research reserves. 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 research reserve and coastal program stakeholders/partners have been shortened by one question to focus on the key information needed by the evaluation team and to reduce the burden on stakeholders.

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.

Coastal program and research reserve manager respondents will receive information requests via e-mail with an attached Microsoft Word document, and submittal of the document as a Microsoft Word document or Adobe pdf file 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 coastal programs and of reserves will receive a link to a web-based survey tool such as 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 a web-based survey.

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 research reserve partners and stakeholders are almost entirely representatives of federal governments, state governments, regional governmental entities, local governments, non-governmental organizations, non-profit organizations, and academia. In a few instances, a small business or other small entity might have some interaction with a coastal program or research reserve. Those businesses or entities (as well as all other partners and stakeholders) will be asked to complete a questionnaire (the same questionnaire will be used for all stakeholders and partners of a program) 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 coastal program and reserve partners and stakeholders has been shortened by one question, reducing the amount of time needed to complete 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 coastal program 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 May 6, 2019 (84 FR No. 87 Page 19767) solicited public comments. No comments were received.

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 program and research reserve information requests will not be disseminated or published by OCM. A summary of responses to the stakeholder survey will be compiled for the coastal program or reserve and the summary will be provided to the program being evaluated and available to the public upon request. However, respondent names will not be linked to survey results.

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 63 approved coastal programs and research reserves,¹ 11 individual programmatic evaluations will need to be conducted each year. Each year, 11 different CZMA managers will need to respond to the information request, and an average of 18 partners and stakeholders of each program will provide information. Thus the estimated number of respondents is 209 annually (11 CZMA program managers; 198 partners and stakeholders²).

Based on the feedback of five managers, the average estimated time per response is 71 hours per manager. The average estimated time per stakeholder response is 15 minutes as calculated by Survey Monkey.

Number of Respondents x Hours x Responses/Year	Annual Burden Hours
1) 11 respondents x 71 hours x 1 response/year CMP and Reserve managers completion of information submittal	781 hours
2) 198 respondents x 15 minutes x 1 response/year	50 hours
Annual Totals: 209 responses	831 hours

¹ 34 coastal programs + 29 research reserves = 63 coastal programs and research reserves.

² 11 programs x 18 partners and stakeholders = 198 partners and stakeholders.

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. For both program managers and research reserve managers, the compensation rate is estimated using 2018 BLS Employer Costs for Employee Compensation for state and local government workers. We proxy research reserve managers by Natural Sciences Managers (SOC 11-9121) working for state government, the hourly average wage rate is \$39.96 (in 2018 dollars), and proxy coastal program managers by Social and Community Service Managers (SOC 11-9151) working for state government, the hourly wage rate is \$34.17. For state and local government workers in management, professional, related occupations: \$40.06 wages and salaries ÷ \$62.08 total compensation = 1.55 compensation factor <https://www.bls.gov/news.release/ecec.t03.htm>. Hence, to estimate the fully loaded hourly wage rate, we multiply the hourly wage rates by 1.55. Therefore for research managers: \$39.96x1.55= \$61.94. For state program managers: \$34.17x1.55= \$52.96.

For stakeholders, Social and Community Service Managers (SOC 11-9151) working for State and Local Government, the hourly wage rate is \$34.17 and \$42.30 (in 2018 dollars), respectively and for natural science managers 39.96 (in 2018 dollars) average will be \$38.81. Stakeholders groups are likely to draw primarily from these types of groups. Multiplying the hourly wage rate by 1.55 = \$60.16 average hourly wage (in 2018 dollars) for stakeholder/partners

Number of hours x hourly wage	Estimated Cost
426 respondent hours x \$52.96 hourly wage	\$22,561
355 respondent hours x \$61.94	\$21,989
50 respondent hours x \$60.16 hourly wage	\$3,008
Annual Total Cost	\$47,558

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 11 programmatic evaluations per year. One evaluator will conduct five evaluations per year, so 2.2 evaluators are needed annually to complete 11 evaluations. The OCM program specialist assigned to work with each CZMA program being evaluated will also participate in the evaluation process, so 11 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 in 2018 at \$96,970 divided by 2087 hours (per OPM guidance on how to calculate hourly wages <https://www.opm.gov/policy-data-oversight/pay-leave/pay-administration/fact-sheets/how-to->

[compute-rates-of-pay/](#) or \$46.46 per hour (2018 wage) Program evaluators were asked how much time they spent on evaluations and determined they spent 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 \$96,970 (2018 wage) divided by 2087 hours (per OPM guidance) or \$46.46 per hour. Program specialists were asked how much time they spent on evaluations and determined that they spent approximately 60 hours on a single evaluation.

Regional representatives from NOAA participate in the evaluation. These are usually managers primarily at 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 \$134,789 divided by 2087 hours (per OPM guidance) for an hourly rate of \$64.59 (2018 wage). The regional representative spends approximately 24 hours on a single evaluation.

Every evaluation now includes a site visit; most site visits take 2.5 days. At least one evaluator, one program specialist, and one regional representative from NOAA participate in a site visit. It is assumed that three participants will not need to travel. Assuming an average of \$2,000/person for a 2.5 day site visit with three people, the travel for site visit will cost approximately \$60,000.

ANNUALIZED COST

Personnel and Travel	Cost
1) 11 evaluations x 330 hours x \$4 46.46 wage for evaluator	\$168,650
2) 11 evaluations x 60 hours x \$ 46.46 wage for site liaison	\$30,664
3) 11 evaluations x 24 hours x \$ 64.59 wage for regional representative	\$ 17,050
4) 8 evaluations x 3 personnel x \$2,000 cost	\$648,000
5) 3 evaluations x 2 personnel x \$2,000 cost	\$12,000
Total Cost:	\$276,364

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.

There is a decrease in respondents from 432 to 209 since the previous renewal, a difference of 223 respondents. The number of manager respondents decreased from 12 to 11 annually as OCM will conduct on average 11 evaluation per year based on current staffing levels. The number of stakeholder respondents decreased from 420 to 198. Stakeholder respondent numbers have been updated based on response rates and to reflect one fewer evaluation per year. The resulting

burden hour decrease of 126 hours, from 957 hours to 831 hours, is a direct result of the decrease in the number of respondents. The number of burden hours per response did not change (71 hours per Manager response and 15 minutes per Stakeholder response).

Costs: Salaries have been updated to reflect inflation. Also, based on staff availability and location over the previous few years, it is anticipated that all evaluations will have three NOAA participants but that in three cases, staff will live in the same region and not need to travel.

The Manager Information Requests have been broken out separately into a CMP Information Request and a NERR Information Request. In practice, coastal program (CMP) managers address the questions in the CMP Manager Information Request and research reserve (NERR) managers only answer questions in the NERR Manager Information Request.

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.