

**SUPPORTING STATEMENT
FOR
ALTERATION OF UNREASONABLY OBSTRUCTIVE BRIDGES
OMB Control No.: 1625-0073
Collection Instruments: None
Expiration: 31 January 2021**

A. JUSTIFICATION

1. Circumstances which make the collection of information necessary.

Under the provisions of 33 U.S.C. 494, 502, 511, 513, 514, 515 516, 517, 521, 522, 523 and 524 the Commandant of the Coast Guard is authorized to determine if a bridge is an unreasonable obstruction to navigation. If a bridge is determined to be unreasonably obstructive under the Truman-Hobbs Act, then under the provisions of 33 U.S.C. 514 the bridge owner is required to prepare and submit general plans, specifications, and, if necessary geographic location to provide for the alteration of the unreasonably obstructive bridge. These plans and specifications submitted by the bridge owner will assist the Commandant in determining under the provisions of 33 U.S.C. 516 the apportionment of cost between the United States and the bridge owner and under 33 U.S.C. 517 the partial payments to be made by the United States to the bridge owner as the alteration progresses.

2. Purpose of the Information Collection

Once a bridge has been determined to be an unreasonable obstruction to navigation safety, the engineers at the Office of Bridge Programs, Coast Guard Headquarters, Washington, DC, collect the necessary information (general plans, specifications, and geographic location) to determine both the scope of the alteration project and the apportionment of cost. This is not a frequent collection of information; the majority of the information is collected at the start of the project. However, during the process of evaluating and managing the information or addressing external questions regarding the project, it is necessary to periodically request additional updates from the bridge owner in order to keep the information current.

The information is reviewed to determine how to proceed with the alteration and to determine what part of the cost of alteration is betterment and what part is necessary to meet the needs of navigation. It also determines the apportionment of the costs to the bridge owner and the Federal government by inserting the cost information, which is part of the plans, into a mathematical model. If this information is not collected, the alteration could not proceed nor could the cost be apportioned. Thus, an unreasonable obstruction to navigation would continue to be a hazard to navigation safety.

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

The information collected via mail, phone, fax or electronically, when possible, will be used in executing an action required by law. The nature of the information requested is case-specific and not readily adaptable to information technology systems. Under the Truman-Hobbs Act, the bridge owner is required to submit architectural plans, specifications and geographic location for

the bridge. When possible, this information is provided by the bridge owner in electronic format. However, the detailed drawings or maps of the geographic locations are too large to send electronically or in a format not compatible with the Coast Guard's computer systems and must be provided by the bridge owner in hardcopy form. Therefore, improved information technology has not been particularly useful in obtaining the required information which is unique to the Bridge Program.

4. Efforts to identify duplication.

There is no other Federal agency with similar programs concerning bridges over navigable waters of the United States. 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 unique to the case 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. The respondents are, with few exceptions, Federal, state, or local government agencies, or organizations employing more than 100 persons.

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

The result would be noncompliance with statutory and regulatory requirements, and the bridge program would be ineffective. Less frequent collection would result in the Coast Guard's inability to make informed decisions on whether the bridge in question or the alteration of that bridge would meet the reasonable needs of navigation with due consideration of the effects on the human environment. Thus, unreasonably obstructive bridges would remain unaltered and a hazard to navigation safety.

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2). There are no special circumstances that would cause an information collection to be conducted in a manner inconsistent with the aforementioned conditions.

8. Solicitation of Comments.

A 60-day Notice was published in the Federal Register to obtain public comment on this collection (See [USCG-2020-0189]; May 29, 2020, 85 FR 32409) and 30-Day Notice (August 11, 2020, 85 FR 48550) were published in the Federal Register to obtain public comment on this collection. We received one unrelated comment in response to our 60 day notice. The commenter requested back pay and compensation related to injustices resulting from the Higher Education Act of 1965 and the Atomic Energy Act of 1954, which are unrelated to this collection

of information for alteration of bridges. No changes have been made to the information collection request. Accordingly, no changes have been made to the Collection.

9. Provide any payment or gift to respondents.

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

10. Assurances of confidentiality provided to respondents.

Not applicable. Bridge alteration case records are public records and subject to applicable provisions of Title 49 Code of Federal Regulations Part 801, Public Availability of Information (49 CFR part 801) and COMDTINST M16590.5C, Bridge Administration Manual, paragraph 1.M.2.).

There are no assurances of confidentiality provided to the respondents for this information collection. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA) and System of Records Notice (SORN). Links to the MISLE PIA and SORN are provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf
- <https://www.gpo.gov/fdsys/pkg/FR-2009-06-25/html/E9-14906.htm>

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.

Currently there are eight studies that have been reviewed. Each study requires management of subject information to verify condition, hazards and operation of the bridge. Our chief engineer (CE) estimates an annual hour burden of approximately 20 hours per study for a total of 160 hours per year for the eight studies. This is based on the CE’s personal experience and that of the engineering staff that are in contact with the bridge owner on a frequent basis during the course of a bridge alteration project.

The annualized cost to respondents for the hour burden for collections of information is approximately \$1,776/engineer, \$136/technician, and \$96/secretary with approximately \$1,200 for travel expenses and \$600 for photography and printing for a total annual cost per study of \$3,808. The total annual cost burden for four studies is \$30,464. (See Table I.)

**TABLE I
BRIDGE OWNER**

Personnel	No. of	Salary	Total	Travel	Photo	Total	No. of	Total
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	hours	per hour	Hourly Cost Burden (Q12)*	Expense	and Printing	Annual Cost/Study (Q13)**	Engineering Studies per Year	Annual Cost Burden (Q14)
Engineer1	16	\$111	\$1776					
Technician 2	2	\$68	\$136					
Secretary3	2	\$48	\$ 96					
			\$2008	\$1,200	\$600	\$3,808	8	\$30,464

* For frequency of response, see column "No. of Engineering Studies Per Year."

** For Q13 start-up cost is not applicable. Cost shown is operational cost.

1 Cost used is for GS-14 equivalent

2 USCG does not use CAD Technicians, Eastern Federal Lands does and the pay grade ranges from GS-5 to GS-11. Cost used is for GS-11

3 Cost used is for GS-07 equivalent

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.

14. Estimates of annualized cost to the Federal Government.

Annualized cost to the Federal government is approximately \$2,120/engineer with approximately \$1,200 for travel and \$300 for photography and printing for a total cost of \$3,420 per study or \$28,960 for four studies. (See Table II.)

**TABLE II
U.S. COAST GUARD**

Personnel	No. of hours	Salary per hour	Total Hourly Cost Burden (Q12)*	Travel Expense	Photo and Printing	Total Annual Cost/Study (Q13)**	No. of Engineering Studies Per Year	Total Annual Cost Burden (Q14)
Engineer	20	\$106	\$2,120					
Technician	--	\$ 0	\$ 0					
Secretary	--	\$ 0	\$ 0					
			\$2,120	\$1,200	\$300	\$3,620	8	\$28,960

*For frequency of response, see column "No. of Engineering Studies Per Year."

**For Q13 start-up cost is not applicable. Cost shown is operation cost.

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 the changes in hourly rates from 2017 to 2020 for the respondents' employees and those of the Federal Government.

16. Plans for tabulation, statistical analysis and publication.

This information collection will not be published for statistical purposes.

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.