

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**A Coastal Management Needs Assessment and Market Analysis for Financing Resilience**  
**OMB Control No. 0648-XXXX**

**Abstract**

This is a request for a new collection of information.

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

NOAA's Office of Coastal Management (OCM) and its regional, state, federal, and non-profit partners have worked closely with coastal managers across the country to increase the resilience of our coastal communities, economies and ecosystems. Per the Coastal Zone Management Act of 1972 (CZMA), OCM provides financial and technical assistance to states and territories, including that which helps its customers (coastal managers) develop hazard mitigation and climate adaptation plans that include strategies for short-term responses to immediate threats (e.g., flooding, hurricanes) as well as long-term responses to gradual changes (e.g., sea level rise, drought). Services are provided through outreach, training, funding, resource, and tool development.

Solutions to these resilience challenges are often complex and cross-sectoral. Therefore, coastal decision-makers regularly point to the need for more substantial, coordinated, sustained and creative funding opportunities to support these efforts. The results of an initial review of more than 200 resources that NOAA conducted in support of this effort, and informal conversations with NOAA customers and other stakeholders, indicate that there is no comprehensive inventory or guide to understanding and selecting appropriate funding options or financing strategies. These findings have been further confirmed in subsequent informal discussions with coastal resilience and finance practitioners at national venues such as the National Adaptation Forum in April 2019 and Social Coast Forum in February 2020, and via feedback through OCM virtual training evaluations. NOAA's coastal management partners have continued to request support on this topic.

The financing world is one that is constantly evolving new products and retiring others. The range of funding and financing options, from grants and low-interest loans to more innovative private-public partnerships and emerging bonds, presents an ever-changing and complex array of choices. In initial internal communications conducted between June and September 2018, NOAA customers indicated that these opportunities and mechanisms are not well understood, and are generally inaccessible to coastal managers, particularly in small to mid-sized communities, rural areas, and tribal communities.

In many coastal communities, investment in mitigation and resilience measures remains either limited or reactive in response to a catastrophic event. While there are no data on the number of adaptation plans that have been implemented, lack of funding is a frequently cited barrier to implementation. At the same time, it has been estimated that investing in mitigation can save communities \$6 for every \$1 spent through mitigation grants from agencies including the Federal Emergency Management Agency, Department of Housing and Urban Development, and Economic Development Administration (according to the National Institute of Building Sciences' October 2018 report, Natural Hazard

Mitigation Saves: Utilities and Transportation Infrastructure). Understanding the suite of funding and financing options available at the time resilience planning is undertaken, and then incorporating financial strategies into the planning process and recommendations, will help ensure that these plans are implemented. Section 310 of the Coastal Zone Management Act allows for technical assistance and management-oriented research to develop and implement state coastal management program amendments.

**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.**

NOAA will be collecting the following information from selected interviewees:

- Role/position, and the extent to which the interviewee and their organization are involved with resilience and resilience funding and finance efforts.
- An overview of the organization's recent and ongoing coastal resilience planning and implementation activities.
- How high a priority coastal resilience is to the organization.
- The gap between coastal resilience needs and currently available funding.
- Funding or financing tools or mechanisms used for resilience (coastal or otherwise) planning and implementation.
- Planning and implementation-related projects funded.
- Coastal resilience projects funded, and programs or mechanisms used to fund the projects.
- Existing networks to share best practices for coastal or other related resilience efforts.
- Extent to which it is difficult to obtain funding or financing for coastal resilience.
- Major barriers to obtaining funding for these efforts.
- Challenge encountered in identifying and securing appropriate funding.
- Organizations, entities, or resources used to obtain funding or information on funding.
- Needed information or resources.
- Extent to which coastal resilience funding and financing needs are evaluated across sectors and considered as part of routine investments.

Interviews will be conducted via one teleconference call; this is the single option for providing information. Interviewees will be individuals representing: state and local coastal management offices; non-profit organizations; academic institutions; finance industry organizations; consulting firms; and, the federal government. Interviewees were identified in part based on previous NOAA and contractor work in the area of resilience finance and coastal resilience, as well as through the literature review and funding and financing program research conducted at the outset of this effort. Additional interviewees self-nominated, based on their interest in the topic and understanding of the value of this research. Selected interviewees are experts in their respective fields and routinely participate in discussions, meetings, conferences, and other events to share their experience and knowledge. This also allows NOAA to limit the sample pool to a small number of people, while still maximizing the knowledge that will be gleaned from the interviews.

Two sets of interview questions have been developed – one for state and local coastal managers and one for all other respondents. The focus of the questions for both groups is the same, with slight variations depending on whether the respondent is directly responsible for managing and funding/financing activities related to coastal resilience (state and local coastal managers) or indirectly responsible for

identifying, managing, and providing access to funding/financing opportunities and associated resources for coastal resilience (all other respondents).

The information provided by interviewees will be synthesized into a needs assessment, which will address needs and information gaps partitioned by region, financial scale, time scale, and scope/sector. The information provided by interviewees will also be used to help inform a summary of existing entities providing resources for resilience funding, as well as a summary of existing and emerging funding sources and financial tools and mechanisms for coastal resilience. Finally, the interviews will inform recommendations on OCM's potential niche in addressing the identified needs and gaps.

The resulting research (and any subsequent resources or tools developed by NOAA to address identified gaps) will provide much needed information to NOAA's customers on funding and financing coastal resilience efforts, including available resources and mechanisms, best practices and strategies, real world success stories, and opportunities for technical and financial partnerships with private and public entities.

This will be a one-time data collection. It is anticipated that the information collected on funding opportunities and financing mechanisms will be disseminated to the public or used to support publicly disseminated information. NOAA OCM 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 collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

**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.**

No automated, electronic, mechanical, or other technological techniques will be used to collect the information. All interviews will be conducted via phone and interviewers will transcribe notes from the interviews.

**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 Question 2**

NOAA compiled existing literature and other resources on the topic in the initial phase of this project. NOAA reviewed over 200 resources, including individual reports, papers, and factsheets and resource clearinghouses and identified 120 that are specifically relevant to this effort. These resources have been reviewed to ensure that the proposed interview effort does not duplicate existing, similar efforts, and interviews. They were also used to identify the most appropriate interviewees and tailor the interview questions to specifically address apparent gaps in research and resources that present challenges for state and local coastal managers receiving NOAA funding. Based on this research, to the best of our knowledge, no other federal studies or interview efforts have been performed that integrate perspectives and experience on coastal resilience finance across the federal, state, local, private, and non-profit sectors. This research identified a significant number of resources that are overly location- and sector-specific and many clearinghouse-type tools that are not specific to coastal resilience, and overwhelming in terms of volume of resources. NOAA also identified very few practical frameworks for cross-sector

engagement and evaluating funding and financing options and limited resources that would be accessible and understandable to small to mid-sized communities. The research also identified gaps in existing funding and financing programs and mechanisms, including but not limited to: many programs and mechanisms being specific to one sector, which may inhibit collaboration and creativity; a focus on physical/infrastructure risks; and, extensive matching requirements that may be financially burdensome to smaller and/or economically disadvantaged communities.

The proposed interviews will serve to address and confirm these gaps and shortcomings firsthand and offer direct, targeted customer feedback from NOAA to ensure that NOAA can develop products and/or services that address these gaps.

Finally, NOAA also compiled an initial list of 70 federal, private, and non-profit funding sources relevant to coastal resilience, which help to further refine the scope of this research and interviews.

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

A limited number of interviewees are affiliated with a small business. To reduce the burden on those entities, we have designed a structured interview framework that will be provided to the interviewee in advance. Interviewees will not be asked to review documentation or conduct any other preparatory work before or after the interview. Additionally, as noted above, numerous interviewees asked to participate in this effort and/or routinely participate in such efforts and conversations due to the nature of their work.

**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.**

These interviews will provide direct customer and expert feedback on how to address gaps in existing knowledge, resources, and funding or financing specifically identified and cited as a significant concern by customers. The interviews are a resource-efficient approach to collecting data that will be valuable to NOAA in understanding challenges and opportunities for financing coastal resilience. Understanding these gaps will allow NOAA to better focus efforts and resources to address customer needs in this area and ensure no duplication of effort. NOAA will also be able to use this information to identify opportunities for leveraging existing technical and financial resources to improve state and local capacity for funding and financing coastal resilience. In particular, NOAA seeks to identify innovative opportunities and examples from analogous sectors for leveraging non-federal sources of funding and financing to increase available resources for coastal resilience efforts without additional federal investment.

Since this is a one-time collection, collecting the data less frequently would involve not collecting the data at all. Without the needs assessment information NOAA would have no specific customer feedback on these topics and would not be able to provide tailored resources and products that directly reflect customer needs. NOAA cannot effectively serve its coastal management partners on this important topic of coastal resilience financing, and coastal communities will continue to struggle to understand and access different funding and financing options.

NOAA is not aware of any technical or legal obstacles to efforts to reduce the burden on respondents.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**

This collection of information does not require any special circumstances and the collection will be conducted in a manner consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register notice published on January 28, 2021, (86 FR 7365) solicited public comments. No comments were received.

This collection of information is a direct result of conversations with external stakeholders on the availability – or lack thereof – of the data and all comments were used to determine the data elements to be recorded.

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

There are no gifts or payments being made to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

NOAA is not assuring confidentiality to respondents under this data collection. NOAA has subcontracted with Eastern Research Group, Inc. (ERG) to conduct the interviews, and worked with ERG to develop a list of potential interviewees publicly recognized as authorities on the topic of resilience finance and related issues. Participating in an interview is not required and potential interviewees can refuse to participate or answer questions if they choose.

**11. 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. 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.**

The survey does not involve any sensitive questions.

**12. Provide estimates of the hour burden of the collection of information.**

Table 1 provides an estimate of the burden hours for this data collection. NOAA (via contractor ERG) plans to contact up to 51 potential interviewees representing: state and local coastal management offices; non-profit organizations; academic institutions; finance industry organizations; consulting firms; and, the federal government. NOAA anticipates that participation will be approximately 71%, or 36 individuals.

| Information Collection   | Type of Respondent (e.g., Occupational Title) | # of Respondents/year (a) | Annual # of Responses / Respondent (b) | Total # of Annual Responses (c) = (a) x (b) | Burden Hrs / Response (d) | Total Annual Burden Hrs (e) = (c) x (d) | Hourly Wage Rate (for Type of Respondent) (f) | Total Annual Wage Burden Costs (g) = (e) x (f) |
|--|---|---------------------------|--|---|---------------------------|---|---|--|
| Coastal Resilience Funding and Financing Opportunities and Needs | Coastal Managers                              | 36                        | 1                                      | 36  | 1.5                       | 54                                      | \$50.80                                       | \$2,743.20                                     |
| <b>Totals</b>  |   |                           |  | <b>36</b>                                   |                           | <b>54</b>                               |   | <b>\$2,743.20</b>                              |

\*Cost was calculated using the national estimated median hourly wage for management occupations (\$50.80)

(<https://www.bls.gov/oes/current/oes110000.htm>)

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information 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.**

| Cost Descriptions | Grade/Step | Loaded Salary /Cost | % of Effort | Fringe (if Applicable) | Total Cost to Government |
|-------------------|------------|---------------------|-------------|------------------------|--------------------------|
| Federal Oversight | ZA-0343-IV | \$141,474           | 2%          |                        | \$2,829                  |
| Contractor Cost   |            | \$98,485            | 25%         |                        | \$24,621                 |
| Travel            |            |                     |             |                        |                          |
| Other Costs:      |            |                     |             |                        |                          |
| <b>TOTAL</b>      |            |                     |             |                        | <b>\$27,451</b>          |

**15. Explain the reasons for any program changes or adjustments reported in ROCIS.**

This is a new collection of information.

**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.**

NOAA will develop tabulations and cross-tabulations of the information as needed. NOAA will collect the data over the 2-3 months following approval. NOAA currently does not intend to publish the outcomes of this research as a stand-alone, external publication, but may present on the outcomes at agency meetings, public conferences, and other venues, and will use the results to inform the development of follow-on products and services that incorporate outcomes of this research.

**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.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).