

Draft Calcs

This sheet was derived from reviewing the first FRN and supporting statement associated with the 2021 ICR

Draft Table

This came directly from the supporting statement

Revised Calcs

This sheet adds Florida into the calculations, bumping up annual report and permit review to 5 states; no im

Revised Table

Updated off revised calcs

Florida Summary

This is really a summary of what each state's burdens are based on MI and NJ input, it's the impact that addi

Impact on program assumption (static at 2 new states)

Adding Florida had to our burden estimates.

	Program Assumption					
	3 year	1 year	2 states	3 states	4 states	
State Total Hours	1012	337.3333	674.6667	1012	1349.3333	Permit review (State)
State 404(g) Hours	770	256.6667	513.3333	770	1026.667	Permit filing (permittee)
Consult agreement	34	11.33333	22.66667	34	45.33333	
State consult hours NHPA	4	1.333333	2.666667	4	5.333333	
State consult hours ESA	4	1.333333	2.666667	4	5.333333	
epa/usfws/nmfs consult	200	66.66667	133.3333	200	266.6667	
corps consult	200	66.66667	133.3333	200	266.6667	

	salary	hours	hour wage
GS 11 Salary	64009	2080	30.77356
Hourly envt consultant			25.53
GS 13 Salary	91231	2080	43.86106
GS 12 Salary	76721	2080	36.8851

State and Permittee burden				
Program Assumption Cost				
	3 year/1 St2 state	3 state	4 state	
Program Assumption (GS11	31142.84	62285.68	93428.52	124571.4
Program assumption (1.6 o	49828.54	99657.09	149485.6	199314.2
Permit Applications				
Permit Application (GS11)	881503.9	1763008	2644512	3526016
Permit Application (1.6 ove	1410406	2820813	4231219	5641625
Permittee burden	633412.1	1266824	2533648	5067297
Annual Report				
Annual report (GS11)	3385.091	6770.183	10155.27	13540.37
Annual report (1.6 overhea	5416.146	10832.29	16248.44	21664.58
Agency Burden				
Program Assumption				
	Per State	2 state	3 state	4 state
200 Corps hours	8772.212	17544.42	26316.63	35088.85
242 ESA/NHPA hours	10614.38	21228.75	31843.13	42457.5
Total 442 hours	19386.59	38773.17	58159.76	77546.35
Burden with 1.6 overhead	31018.54	62037.08	93055.62	124074.2
Permit Applications				
	Per State	2 state	3 state	4 state
2000 hrs gs12	73770.19	147540.4	221310.6	295080.8
permit review w 1.6 overhe	118032.3	236064.6	354096.9	472129.2
Annual Reports				
40 hrs gs12	1475.404	2950.808	4426.212	5901.615
annual reports w 1.6 overh	2360.646	4721.292	7081.938	9442.585

program assumption
 permit application
 annual report
 total

Burden to EPA
 program assumption
 permit application
 annual report
 total

Permit Application						
Hours	Number per st	Total hours per 2 states	3 states	4 states		
12.7	2255.5	28644.85	57289.7	85934.55	114579.4	
11	2255.5	24810.5	49621	74431.5	99242	

Annual Report				
Report	Hours	2 states	3 states	4 states
	110	220	330	440

Green are numbers called out for cost estimates. Sometimes the costs originally are estimated for one state and then projected to 4 states. Sometimes they're estimated for only 2 states.

Yellow are numbers called out for hours but not actually used later in cost estimates.

Total hours to Total cost to states

674.6666667	33219.02974	99657.09/3	2 states (annual)	675	173770.4
114579.4	5641625.21		4 states	114579.4	44810.4
440	21664.58		4 states	49621	
115694.0667	5696508.82			8455	
13265.93333				440	

Total hours Total cost

295	20679.02667	62037.08/3	2 states (annual)
8000	472129.2		4 states
160	9442.59		4 states
8455	502250.8167		

	Respondent Burden & Cost	Agency Burden & Cost
A: Program Assumption Request		
States	2	2
Modifications	0	0
Application Hours per Request	1,012	442
Total Hours Requested	2,024 (675 annually)	884 (295 annually)
Current OMB Inventory (Hours)	1,040	400
TAS Request for Tribes if Any Were to Assume	0 (No tribes currently expected to assume)	0 (No tribes currently expected to assume)
Cost per Request	\$31,142.84	\$19,386.58
Cost per Request with Overhead	\$49,828.54	\$31,018.52
Total Cost	\$99,657.08	\$62,037.04
B. 1: Permit Review (4 states)		
	State Review of Permits	Agency Review of Permits
Permit Applications Reviewed per State Annually	2,255.50	25
Application Hours per Permit	12.7	80
Total Hours Requested per State	28,644.85	2,000
Total Hours Requested for 4 State Assumed Programs	114,579.40	8,000
Current OMB Inventory (Hours)	119,000	8,000
Cost of Review per State	\$881,503.94	\$73,770.19
Cost per Request with Overhead	\$1,410,406.30	\$118,032.30
Total Annual Cost with Overhead for 4 State Assumed Programs	\$5,641,625.21	\$472,129.20
B. 2: Permittee Information		
	Public Burden	N/A
Application Hours per Permit	11	N/A
Total Hours for MI and NJ applicants	49,621	N/A
Total Cost to Permittees in MI & NJ	\$1,266,824.13	N/A
C: Annual Report		
	State Development of Annual Report	Agency Review of Annual Report
Number of States That Have Assumed the Program	4	4
Hours per Report	110	40
Total Hours Requested	440	160

Current OMB Inventory (Hours)	360	160
Cost per Report	\$3,385.09	\$1,475.40
Total Cost with Overhead	\$21,664.56	\$9,442.56

Program Assumption			
	3 year	1 year	2 states
State Total Hours	1012	337.3333333333	674.666666666667
State 404(g) Hours	770	256.6666666667	513.333333333333
Consult agreement	34	11.3333333333	22.6666666666667
State consult hours NHPA	4	1.3333333333	2.66666666666667
State consult hours ESA	4	1.3333333333	2.66666666666667
epa/usfws/nmfs consult	200	66.6666666667	133.333333333333
corps consult	200	66.6666666667	133.333333333333

These change in the no consult version

Notes: in any given ICR, we model for 2 new states applying for assumption; consults over NHPA, ESA are new. These hours are double counted - both the state and federal governments are expected to need 242 hours. Corps consult only applies to federal burden.

Hourly Wages				
	salary	hours	hour wage	Note: updated
GS 11 Salary	\$ 64,649.00	2080	\$ 31.08	to 2021 rates
Hourly envt consultant			\$ 25.53	
GS 13 Salary	\$ 92,143.00	2080	\$ 44.30	
GS 12 Salary	\$ 77,488.00	2080	\$ 37.25	

State and Permittee burden				
Program Assumption Cost				
	3 year/1 State	2 state		
Program Assumption (GS11)	\$ 31,454.23	\$ 62,908.45		
Program assumption (1.6 o	\$ 50,326.76	\$ 100,653.52		
Permit Applications				
	1 state	3 state	4 state	5 state
Permit Application (GS11)	\$ 890,317.74	\$ 2,670,953.23	\$ 3,561,270.98	\$ 4,451,588.72
Permit Application (1.6 ove	\$ 1,424,508.39	\$ 4,273,525.17	\$ 5,698,033.56	\$ 7,122,541.95
Permittee burden	\$ 633,412.07	\$ 1,900,236.20	\$ 2,533,648.26	\$ 3,167,060.33
Annual Report				
Annual report (GS11)	\$ 3,418.94	\$ 10,256.81	\$ 13,675.75	\$ 17,094.69
Annual report (1.6 overhea	\$ 5,470.30	\$ 16,410.90	\$ 21,881.20	\$ 27,351.50

Agency Burden				
Program Assumption				
	Per State	2 state		
200 Corps hours	\$ 8,859.90	\$ 17,719.81		
242 ESA/NHPA hours	\$ 10,720.48	\$ 21,440.97		
Total 442 hours	\$ 19,580.39	\$ 39,160.78		
Burden with 1.6 overhead	\$ 31,328.62	\$ 62,657.24		
Permit Applications				
	1 state	3 state	4 state	5 state
2000 hrs gs12	\$ 74,507.69	\$ 223,523.08	\$ 298,030.77	\$ 372,538.46
permit review w 1.6 overhe	\$ 119,212.31	\$ 357,636.92	\$ 476,849.23	\$ 596,061.54
Annual Reports				
40 hrs gs12	\$ 1,490.15	\$ 4,470.46	\$ 5,960.62	\$ 7,450.77
annual reports w 1.6 overh	\$ 2,384.25	\$ 7,152.74	\$ 9,536.98	\$ 11,921.23

Note: Program assumption is modeled for 2 new states; permit application and annual reports are modeled for 3 states (existing assumed), 4 states (what was used in draft), and 5 states (what needs to go in new draft)

Permit Application					
	Hours	Number per stat	Total hours p3 states	4 states	
Permit review (State)	12.7	2255.5	28644.85	85934.55	114579.4
Permit filing (permittee)	11	2255.5	24810.5	74431.5	99242

Annual Report				
Report	Hours	2 states	4 states	5 states
	110	220	440	550

SUMMARY INFO					
Burden to State	Total hours	Total cost			
program assumption	674.666666666667	\$ 33,551.17	c25/3	2 states (annual)	
permit application review	143224.25	\$ 7,122,541.95		5 states	
annual report	550	\$ 27,351.50		5 states	
permittee applications	74431.5	\$ 1,900,236.20		3 states	
total	218880.416666667	\$ 7,183,444.63	This excludes permittee application cos		
prior total	128960				
Difference	89920.416666667				
Burden to EPA	Total hours	Total cost			
program assumption	295	\$ 20,885.75	c40/3	2 states (annual)	
permit application	10000	\$ 596,061.54		5 states	
annual report	200	\$ 11,921.23		5 states	
total	10495	\$ 628,868.52			

Permit Review ROCIS

Number of respondents = number of permit reviewers and permittees in 5 states for state govts and in 3 state
18044 (11277.5+6766.5)

Annual Burden for Permit Review including permittee applications
217655.75 (143224.25+74431.5)

Annual Report ROCIS

Number of respondents: 5 Burden: 110 per respondent (550 total)

Program Assumption ROCIS

Number of Respondents: 2 Burden: 337.3 per respondent (674.67 total)

5 states	Number of permits in all applicable states
143224.3	11277.5
124052.5	6766.5

ts which are noted separately.

s for permittees

Table 1: Burden and Cost Overview

	Respondent Burden & Cost
A: Program Assumption Request	
States	2
Modifications	0
Application Hours per Request	1,012
Total Hours Requested	2,024 (675 annually)
Current OMB Inventory (Hours)	1,040
TAS Request for Tribes if Any Were to Assume	0 (No tribes currently expected to assume)
Cost per Request	\$31,454.23
Cost per Request with Overhead	\$50,326.76
Total Cost	\$100,653.52
B. 1: Permit Review (5 states)	
State Review of Permits	
Permit Applications Reviewed per State Annually	2,255.50
Application Hours per Permit	12.7
Total Hours Requested per State	28,644.85
Total Hours Requested for 5 State Assumed Programs	143,224.25
Current OMB Inventory (Hours)	119,000
Cost of Review per State	\$890,317.74
Cost per Request with Overhead	\$1,424,508.39
Total Annual Cost with Overhead for 5 State Assumed Programs	\$7,122,541.95
B. 2: Permittee Information	
Public Burden	
Application Hours per Permit	11
Total Hours for MI, NJ and FL applicants	74,432
Total Cost to Permittees in MI, NJ & FL	\$1,900,236.20
C: Annual Report	
State Development of Annual Report	
Number of States That Have Assumed the Program	5
Hours per Report	110
Total Hours Requested	440
Current OMB Inventory (Hours)	360
Cost per Report	\$3,418.94
Total Cost with Overhead	\$27,351.50

Agency Burden & Cost	
	2
	0
	442
884 (295 annually)	
	400
0 (No tribes currently expected to assume)	
	\$19,580.39
	\$31,328.62
	\$62,657.24
Agency Review of Permits	
	25
	80
	2,000
	10,000
	8,000
	\$74,507.69
	\$119,212.31
	\$596,061.54
N/A	
N/A	
N/A	
N/A	
Agency Review of Annual Report	
	5
	40
	200
	160
	\$1,490.15
	\$11,921.23

Table 2: Florida Burden and Cost		
B. 1: Permit Review	State Review of Permits	Agency Review of Permits
Permit Applications Reviewed per State Annually	2,255.50	25
Application Hours per Permit	12.7	80
Total Hours Requested per State	28,644.85	2,000
Total Cost of Review with Overhead	\$1,424,508.39	\$5,470.30
C: Annual Report	State Development of Annual Report	Agency Review of Annual Report
Hours per Report	110	40
Total Cost per Report with Overhead	\$5,470.30	\$2,384.25
Total Burden Hours	28,754.85	120.00
Total Cost	\$1,429,978.69	\$7,854.55
Note: these values are extrapolated from averages derived from NJ and MI. In effect, these are the projected averages per state. Updated data that includes FL input will be in future ICRs.		