

**SUPPORTING STATEMENT
FOR
DRAWBRIDGE OPERATION REGULATIONS
OMB Control No.: 1625-0109
Collection Instruments: None.
Expiration: 30 September 2024**

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 in accordance with the Coast Guard Authorization Act of 2018 any temporary change lasting 180 days or less need only be published in the Local and Broadcast Notice to Mariners. However, both temporary and permanent changes shall include a statement of time, place, and nature of the change. The information needed for the change to the rule can only be obtained from the bridge owners. The information collection requirements are contained in 33CFR 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 or electronic format, from the bridge owner or a delegate there of, 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 collected is 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 the Coast Guard receives approximately 90 percent electronically and the remainder by U.S. mail.

The CG Office of Bridge Operations and Engineering (CG-BRG-1) conducted Usability testing to determine if the Instruction associated with this collection used plain language. All participants were members of the United States Coast Guard but were not affiliated with the program office. CG-BRG-1 found that respondents understood the instruction and had no questions regarding the content. As such, no changes were made to the collection.

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 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-2024-0183]; March 13, 2024, 89 FR 18425) and 30-Day Notice (July 26, 2024, 89 FR 60645) were published in the Federal Register to obtain public comment on this collection. The Coast Guard has not received any comments on this information collection.

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 M16590.5D, Bridge Program Instruction, paragraph 1.M.2.). Also, all comments are posted to the rule making docket for the action which is publicly available through the Office of the Federal Register website at www.regulations.gov. This information collection request is covered by the Marine Information for Safety and Law Enforcement (MISLE) Privacy Impact Assessment (PIA). The link to the MISLE PIA is provided below:

- https://www.dhs.gov/sites/default/files/publications/privacy_pia_uscg_misle.pdf

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.

The Bridge Program receives approximately 412 requests from bridge owners per year to authorize permanent or temporary changes to drawbridge operating regulations. Of those 412 requests, approximately 46 actions require publication in the Federal Register. The remaining 366 actions DO NOT need to be published in the Federal Register and are announced in the Local and Broadcast Notice to Mariners. The burden of cost at the Federal Level is found in tables B & C. The burden cost per hour for the public to request a temporary or permanent change to a drawbridge operating schedule is found in Table A.

The estimated “annual hour burden”, nationwide for the 412 actions is approximately 412 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 412 letters with a request of change would be \$20,600, as described below in Table A:

Table A – Approximate Yearly Actions Requests

PERSONNEL	PER REQUEST			TOTAL (PER YEAR)		
	Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
Clerical Level equivalent to (GS-7)	\$50	1	\$50	412	412	\$20,600
TOTALS		1	\$50	412	412	\$20,600

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

The estimated burden is based on the length of time necessary to prepare an email/letter with the information required for the requested change and its submittal 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 366 letters with a request of change would be \$19,776.

13. Estimate of the annualized capital/start-up costs to respondents.

There are no capital, start-up or maintenance costs associated with this information collection.

14. Estimates of annualized cost to the Federal Government.

Based on district experience, each request that requires publication in the Federal Register needs 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 46 requests per year, the resulting man-hours per year are 345 (7.5 x 46) for all district bridge offices that review the requests. Thus, the estimated annual costs to the Coast Guard for processing 46 requests are \$29,716, as described below in Table B:

Table B – Actions Published in Federal Register

PERSONNEL	PER REQUEST			TOTAL (PER YEAR)		
	Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
District Bridge/USCG (GS-12)	\$82	5	\$410	46	230	\$18,860
District Legal/USCG (O3)	\$89	2	\$178	46	92	\$8,188
HQ Legal/USCG(GS-14)	\$116	0.5	\$58	46	23	\$2,668
TOTALS		7.5	\$596	46	345	\$29,716

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

Based on district experience, each request that DOES NOT require publication in the Federal Register necessitates a total of approximately 2.5 hours to process by District Bridge personnel (GS-12). Since these actions are not published in the Federal Register, they do not require legal review. With the average annual total of 366 requests per year, the resulting man-hours per year

are 915 (2.5 x 366) for all district bridge offices that review the requests. Thus, the estimated annual costs to the Coast Guard for processing 366 requests are \$75,030, as described below in Table C:

Table C – Actions Not Published in the Federal Register.

PERSONNEL	PER REQUEST			TOTAL (PER YEAR)		
	Hourly Rate*	Hours	Total	# of Requests	Hours	Cost
District Bridge/USCG (GS-12)	\$82	2.5	\$205	366	915	\$75,030
TOTALS		2.5	\$205	366	915	\$75,030

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

15. Reason for changes or adjustments in the burden.

The amount of burden for time has not changed since the 2020 submission. The changes in cost are based on the changes in hourly rates from 2020 to 2024 for the respondents’ employees and those of 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.