1625-0008

SUPPORTING STATEMENT FOR REGATTAS AND MARINE PARADES APPLICATION & SUPPLEMENTAL FORMS OMB Control No.: 1625-0008

A. Justification

1. Explain circumstances that make collection of information necessary.

Regattas, marine parades, and other organized water events of limited duration conducted on a prearranged schedule (marine events) may present "extra or unusual hazards to the safety of life on the navigable waters of the United States" (33 CFR 100.05 and 100.15). Marine events may interfere with the ability of vessels to safely navigate marked channels and designated shipping lanes. In turn, such vessels may interfere with the safety or conduct of the marine event. Title 46 USC §70041 authorizes the Coast Guard to issue regulations to promote the safety of life on navigable waters during regattas and marine parades. Title 33 CFR Part 100 the Coast Guard establishes regulations to provide effective control over marine events in order to mitigate any associated hazards in the event area. Title 33 CFR §1.05-1 delegates this control to Coast Guard District Commanders.

2. Indicate how, by whom, how frequently, and for what purpose information is to be used.

Title 33 CFR §100.15 requires individuals or organizations planning to hold a marine event to submit an application to hold the event to the Coast Guard. The Application for Approval of Marine Event, form CG-4423 provides the Coast Guard with information needed to:

- Differentiate the marine event from other events;
- Identify the event sponsor and responsible representatives;
- Consider whether the event presents extra or unusual hazards to the safety of life;
- Assess what controls may be necessary to mitigate those hazards; and
- Issue notices to mariners under Title 33 CFR Subpart 72.01 to inform the public about the event, as a further form of hazard mitigation.

The purpose of the application information elements is to guide applicants in providing the information required per 33 CFR 100.15(d).

Items 1 through 4: The name, date, time, and location of the event provide information for the Coast Guard to differentiate the event from other events.

Item 5: The name and address of the sponsoring organization or authorized representative provides the Coast Guard the means to identify who is planning the event.

Items 6 through 10: These items provide the Coast Guard the minimal information needed to assess the size and complexity of the event. This includes the numbers of participants and involved boats and other vessels, and the activities that will occur. This information is also used in advising the boating public about the event. Attaching a section of a chart or a scale drawing showing the event boundaries and/or courses and markers contemplated is needed to clearly indicate where the event occurs, the event's relationship to navigation channels or potential environmental impacts, and placement of course markers/navigational aids for the event.

Items 11 through 13a: These items help the Coast Guard identify whether the applicant has considered the potential hazards during the event. These items may also help the Coast Guard's own assessment of the hazards.

Items 14 through 19: These items provide information about the resources (typically vessels and safety staff) that the applicant is proposing in order to mitigate the likelihood and outcomes of hazards during the event. The number of sponsor provided safety patrol vessels is needed to consider the adequacy of protection provided by the sponsor and what additional resources may be needed to ensure the safety of life during the event. The Coast Guard cannot have any question or doubt over the location, sailing courses or event boundaries separating participants from non-participants or adjacent navigation. These items provide grounds for determining what actions the Coast Guard must take related to the application and in accordance with 33 CFR §§100.20 and 100.25 (approve the application for the event; require changes to the application; state that no regulation or patrol is needed in order to hold the event safely; or disapprove the application).

Items 20 through 20b: These items provide the contact information for the applicant's representative who is in charge of all details related to the event's planning. The Coast Guard uses this information to make additional inquiries about the nature of the event and to provide the Coast Guard's decision regarding the application. In some cases, the applicant performs all of these duties. In those cases, the applicant need not repeat the information.

Items 21 through 23b: These items provide contact information about the applicant or the applicant's legal representative, who may be different than the event's sponsor (item 5).

Item 24: This is the legal signature of the applicant, attesting to their authority to submit the application on behalf of the event sponsor (item 5). There is no statutory or regulatory requirement that applications be signed or otherwise certified by the applicant. However, the Coast Guard wishes affirmation that the person submitting the form has the authority to do so.

Item 25: The applicant must provide the name of the Captain of the Port Zone in which the marine event will occur.

The Coast Guard must develop environmental documentation appropriate for the event either from additional environmental information provided by the sponsor in the application or on its own, based on experience with other similar events in similar locations. This environmental documentation enables the Coast Guard to properly assess potential environmental impacts, the applicant's efforts to mitigate or avoid those impacts, including other contacts with other agencies and their responses, and to develop appropriate environmental documentation and permit conditions. The information provided in all of the items above facilitate the Coast Guard's environmental documentation.

3. Describe whether, and to what extent the collection of information involves the use of automated or other collection techniques.

- Public-facing instructions were tested by the staff of the CG Office of Waterways and Ocean Policy (CG-WWM-1) to ensure the use of plain language. No changes were needed.
- Is not related to a public benefit program as detailed in OMB M-22-10 (titled "Improving Access to Public Benefits Programs Through the Paperwork Reduction Act" dated April 13, 2022).
- The CG-WWM-1 conducted Usability testing to determine if the CG-Forms associated in this collection used plain language. All participants were members of the United States Coast

Guard but were not affiliated with the program office. CGRC found that respondents understood the forms and had no questions regarding the content. As such, no changes were made to the collection.

Is required by statute, and/or regulation as noted in section 1 of the Supporting Statement.

4. Describe efforts to identify duplication.

The information supplied in the application for a marine event permit is not available from other sources in a timely manner. The Coast Guard assesses the hazards related to each event on a case-by-case basis. Although information may exist for a similar event in a given Coast Guard office's area of responsibility, Coast Guard experience has shown that each event presents sufficient differences in the nature of its hazards to warrant continued assessment of each event as a unique project.

5. Does collection of information impact small businesses?

This information collection will not have an impact on small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if collection is not conducted.

If the information in the permit application were not provided when a permit is required, the Coast Guard would not be able to determine whether an event poses extra or unusual hazards to the safety of life. This is likely to result in the loss of human life unless event sponsors and the Coast Guard take specific precautions. Without this information, the Coast Guard would be unable to issue a notice to mariners to alert the navigation community of the event, its location and its schedule, nor prepare the proper environmental documentation and appropriate mitigation and precautionary measures in a timely manner.

7. Explain any special circumstances that would cause an information collection to be conducted in a certain manner.

This information collection will be conducted in a manner consistent with the guidelines in 5CFR 1320.5(d)(2).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection.

A 60-Day Notice (See [USCG-2024-56398], July 9, 2024, 89 FR 56398) and 30-Day Notice (October 4, 2024, 89 FR 80908 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. Explain any decision to provide any payment or gift to respondents.

The Coast Guard does not provide payments of gifts to respondents in exchange for a benefit sought.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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. Provide additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

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

The total annual hour burden on respondents is estimated to be 3349 hours. The total annual cost to respondents for submitting permit applications is estimated to be $208,240.82.

The Coast Guard estimates there will be approximately 3,300 respondents submitting a permit application for one or more events to the Coast Guard annually. We estimate that 97% (3202 applications) will be submitted online through the Homeport Web Portal.

The time to gather the marine event information to prepare the permit application and complete the form is estimated to take approximately 60 minutes for the automated Adobe form. The time to complete the online application and email attachments is approximately 90 minutes. The permit application may be typed in online format or using an automated form suitable for facsimile or mailing. Respondents may also print out a blank CG-4423 and complete it in ink. Even though the information must be developed over the course of planning the event, someone must collect the details to enter them into the permit application. This includes time to obtain a chart section or prepare a scale drawing, enter event boundaries, courses and markers that the Coast Guard needs to consider any impacts the event may have on navigation, whether or not to issue the permit, and to use as needed for a notice to mariners. The explanations for items 3, 5, 6, 8 and 9 consume most of the estimated time to complete the permit application.

Total annual burden on the public:
1 hour x 3202 (automated form) = 3202 hours
1.5 hours x 98 (online form) =147 hours
Total burden hours = 3349 hours

Estimated cost burden.
Permit applications come from sponsors of marine events which include a variety of groups with an interest in marine activities. The Coast Guard estimates that most permit application forms are completed by personnel who meet the Bureau of Labor and Statistics (BLS) definition of General and Operations Managers. BLS estimates the mean hourly salary of General and Operations Managers as $62.18.

The cost per marine event to complete an automated Adobe permit application is therefore $62.18 (1 hour x $62.18/hr). The cost per marine event to complete an online application is therefore $93.27 (90 minutes x $62.18/hr). The total cost burden to the public to complete

permits for regattas and marine parades is $208,240.82 [($93.27×98 forms)+($62.18×3,202 forms)].

Summary for applicants

Number expected to be submitted online	98 (3% of total)	Number of Forms Submitted
Number expected to be submitted on automated Adobe form	3,202 (97% of total)	
Total Number of CG-4423 forms submitted annually	3,300	
Estimated time to complete online CG-4423 + email attachments	1 hour 30 minutes	Time to Complete
Estimated time to complete automated Adobe CG-4423	1 hour	
Estimated time burden for online CG-4423	147 hours (1.5 hour × 98 forms)	Public Time Burden
Estimated time burden for automated Adobe CG-4423	3,202 hours (1 hours × 3,202 forms)	
Total Estimated time burden	3,349 hours (147 + 3,202 hours)	
BLS mean hourly wage for General & Operations Managers (May 2023) https://www.bls.gov/oes/current/oes_nat.htm	$62.18	Public Cost Burden
Estimated cost per marine event to submit online	$93.27 (1.5 hour × $62.18/hour)	
Estimated cost per marine event to submit automated Adobe form	$62.18 (1 hour × $62.18/hour)	
Total Estimated cost burden to public	$208,240.82 ($93.27 × 98) + ($62.18 × 3,202)	

13. Provide an estimate of the total annual cost burden to respondents or record keepers.

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

14. Provide estimates of annualized cost to the Federal Government.

According to the Marine Information for Safety and Law Enforcement (MISLE) database, between 2020 and 2023, the Coast Guard received on average (arithmetic mean) 3,278 marine event applications per year. The median number of applications for these years is 3,537. The proposed estimate of 3,300 allows for minor yearly fluctuations in the number of permit applications as was seen in 2020 during the COVID-19 pandemic.

Year	Total Marine Permit Activities
2020	2,233
2021	3,343

2022	3,805
2023	3,732

Operational Expenses: Estimated number of respondents annually is 3,300 permit applications processed. Total annual cost to the government is $514,800. The source for the personnel cost figures is Appendix B to Commandant Instruction 7310.1W, *Hourly Rates for Personnel*.

The Coast Guard estimates that the total cost to the Government for conducting an administrative review at an estimated 3300 permit applications (Form CG-4423) annually for a marine event is $514,800. This is based upon the average of 2 hours work for an E-4 through O-3 (median $74.00 per hour) and 2 hours of work for a GS-11 through GS-13 (median $82.00 per hour). This accounts for reviewing 3,500 permit applications, determining whether or not a permit should be required, and preparing a local and broadcast notice to mariners for the event.

15. Explain the reasons for any changes or adjustments reported in items 13 or 14.

There was not a substantial change in the expected burden. The COVID-19 pandemic prevented many marine events and public gatherings from occurring. A relative spike in permitted events followed as the nation slowly returned to normal life.

16. Outline plans for tabulation and publication.

This information collection will not be published for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions,"of OMB Form 83-I.

The Coast Guard does not request an exception to the certification of this information collection.