

USDA-NRCS
OMB No. 0578-0030
Supporting Statement Emergency Authorization and Clearance

Damage Survey Report (DSR), Electronic Disaster Report (EDR) and Sponsor Request for EWP Assistance

This document represents a request for a continuance and three-year authorization of an approved information collection that will expire July 31, 2008. This information collection consists of the necessary information requirements for participation in the Emergency Watershed Protection Program (EWPP). The Emergency Watershed Protection (EWP) Program regulations at 7CFR 624 set forth the basic policies, program provisions, and eligibility requirements for sponsors to participate in the EWP Program.

The Secretary of Agriculture cooperates with other Federal, State, and local agencies in recovery from natural disasters such as hurricanes, tornadoes, fires, drought, and floods through implementation of the EWP Program (authorized by Section 216 of the Flood Control Act of 1950, Public Law 81-516, 33 U.S.C. 701b-1; and Section 403 of the Agricultural Credit Act of 1978, Public Law 95-334, as amended by Section 382, of the Federal Agriculture Improvement and Reform Act of 1996, Public Law 104-127, 16 U.S.C. 2203). NRCS implements EWP recovery component through local sponsors, by providing both financial and technical assistance for emergency measures that retard run-off and control erosion on areas where a sudden impairment of a watershed threatens life or property.

Information Reporting Requirements:

The information reporting requirements and burden related to this information collection package includes reporting requirements associated with the following Application for Damage Survey Report forms:

Form	Description
NRCS-PDM-20	Damage Survey Report (DSR)
NRCS-PDM-20A	Sponsor Request for EWP Assistance

Justification:

1. CIRCUMSTANCES MAKING COLLECTION OF INFORMATION NECESSARY:

NRCS is responsible for the administration of EWP Program. EWP assistance is provided to sponsors to undertake emergency measures for runoff retardation and soil erosion prevention to safeguard lives and property from floods, drought, and the products of erosion on any watershed whenever fire, flood, or any other natural disaster occurrence is causing or has caused a sudden impairment of that watershed.

The sponsor’s request is submitted formally as a letter (NRCS-PDM-20A) to the NRCS State Conservationist for consideration. Form NRCS-PDM-20, Damage Survey Report (DSR), is the agency decision making document that includes the economic, social, and environmental evaluation, as well as the engineer’s cost estimate.

This information collection allows the responsible federal official to make EWP eligibility determinations and provide federal cost-share payments to the sponsor. This request is necessary to implement the EWP Program for which NRCS has statutory authority.

2. HOW MUCH, BY WHOM, AND PURPOSE INFORMATION IS TO BE USED:

The EWP Program utilizes the information request and forms included in this collection as described in the following table.

Program	Description
Emergency Watershed Program (EWP) (7 CFR Part 624)	The EWP was initiated in 1950 and is administered by NRCS. It provides technical and financial assistance to local institutions for the removal of storm and flood debris from stream channels and for the restoration of stream channels and levees to reduce the threat to life and property. The program also provides for establishing permanent easements in floodplains with private landowners.

The information collected is in the form of a sponsor’s EWP request for assistance letter and the Damage Survey Form (DSR). The forms are completed manually and electronically for use by NRCS as follows:

Form	Purpose	Program	Form Description	Who Completes	How Completed	Number Submitted Annually
NRCS-PDM-20A	Sponsor EWP Request for Assistance Letter	EWP	The basic document used by program sponsors to request assistance. Used by NRCS to verify the sponsor’s ability to provide cost-share and other sponsor requirement including obtaining necessary permits and property rights.	Program Sponsor	A sponsor must complete and submit a formal request to the State Conservationist for assistance within 60 days of the natural disaster occurrence, or 60 days from the date when access to the sites becomes available. Requests must include a statement that the sponsors understand their responsibilities and are willing to pay its cost-shared percentage as well as information pertaining to the natural disaster, including the nature, location, and scope of the problems and the assistance needed.	190
NRCS-PDM-20	Program Eligibility	EWP	The Damage Survey Report is the agency decision making document that includes the economic, social, and environmental evaluation, and the engineer’s cost estimate.	Executed by the agency, with concurrence and acceptance (signature) of the sponsor.	Completed by hand or electronically at the location where the watershed impairment exist. NRCS or the program sponsor or vendor could complete the form. Except for signatures for certification statements, any field left blank by the client could be provided by NRCS. NRCS will verify that the practices are eligible for EWP assistance. This form will be available to the public in a fillable format at the following NRCS Web site http://forms.sc.egov.usda.gov/eforms/mainervlet	2,375

Respondents need to identify the following information needed to process any application for program payment: State, County, Disaster Type and Name, Damage Survey Number and Project Number, Environmental, Social, Economic, Engineering, and Extraordinary Circumstances Impacted by the project, Type of Local Contribution, Names of persons, buildings, emergency services impacted, and other information that may be deemed applicable, including any land rights, permits, mitigation agreements, easements, or permissions needed to fully implement the recovery procedures. NRCS employees generally assist the sponsor with completion of the DSR, including a review and recommendation to

the State Conservationist regarding the viability of the application in context and compliance with the statutory and regulatory authorities.

3. USE OF IMPROVED INFORMATION TECHNOLOGY:

NRCS is actively participating in the Departmental Electronic Forms Initiative, including the Freedom to E-File Initiative. NRCS has automated the NRCS-PDM-20 and the form can be completed electronically, and some States have included the ability for sponsors to sign electronically. The sponsor EWP assistance request letter can be mailed, faxed or received via e-mail.

The following is an estimate of forms to be filed electronically in this collection:

Forms	Total Responses	Percent Filed via Internet/Email or Fax	Total Forms Electronic
DSR	2,375	95	2,256
Sponsor request letter	190	95	180
TOTAL	2,565	95	2,436

4. EFFORTS TO IDENTIFY DUPLICATION:

The EWP Program information requirements do not duplicate any other NRCS or USDA forms.

5. METHODS TO MINIMIZE BURDEN OF SMALL BUSINESS ENTITIES:

The collection of information does not involve small businesses and small entities.

6. CONSEQUENCE IF INFORMATION COLLECTION WERE LESS FREQUENT:

The sponsor request letter is a one-time requirement after a natural disaster and the DSR is a one-time form for each site or group of similar sites to determine program eligibility. Without this information NRCS would not be able to implement the program.

7. SPECIAL CIRCUMSTANCES:

The information collection and the forms utilized for the EWP Program are not conducted in a manner consistent with the special circumstances identified in this section.

8. FEDERAL REGISTER NOTICE, SUMMARIZATION OF COMMENTS, AND CONSULTATION WITH PERSONS OUTSIDE THE AGENCY:

NRCS published a notice in the Federal Register on November 19, 2007, (72 FR, Number 222), providing the notice of intent to request a continuance of the current authorization for

this information collection. One comment was received; however, no action or response was needed.

9. PAYMENT OF GIFTS TO RESPONDENTS:

Payments are for the construction of EWP recovery measures and not a form of benefit or payment.

10. CONFIDENTIALLY PROVIDED TO RESPONDENTS:

These forms are handled according to established NRCS procedures implementing the Privacy and Freedom of Information Act of 1974 and OMB Circular A-130, “Responsibilities for the Maintenance of Records, About Individuals by Federal Agencies.”

11. QUESTIONS OF A SENSITIVE NATURE:

No sensitive questions regarding sexual behavior and attitudes, religious beliefs, and other matters which are commonly considered private are asked on the forms.

12. ESTIMATE OF BURDEN AND COST TO RESPONDENTS:

The following table illustrates how the burden estimate for this information collection package was developed.

Form	No. Respondents	Collection Frequency	Total Responses	Minutes per Response	Total Minutes	Total Hours
NRCS-PDM-20 (DSR)	190	12.5	2,375	120	285,000	4,750
NRCS-PDM-20A	190	1	190	90	17,100	285
Totals	380	13.5	2,565	210	302,100	5,035
Average(rounded)	190	6.75		118		1.97

NRCS anticipates the total number of respondents will be 380. Generally, respondents will file one request for assistance under the EWP program using Appendix A to the DSR for each event. Additionally, these forms would be accompanied by any number of the form NRCS-PDM-20, Damage Survey Report (DSR) as each segment or section of the area damaged must be independently surveyed. Therefore, the NRCS estimates include a total of 2,565 responses (190 NRCS-PDM-20A’s and 2,375 NRCS-PDM-20) to be executed for a total estimated burden of 5,035 hours, with a burden of 118 minutes or 1.97 hours per respondent.

The burden was estimated based on a projected average of documents to be filed annually based on the previous levels of activity for the program on an annual basis.

The Secretary has the authority to operate the EWPP until Congress rescinds the law. The number of respondents was averaged from 2004 through 2008.

Total annual cost to the respondents is \$38,475.00. This figure is computed based on 5,035 burden hours times an average hourly wage of \$15.00 per hour for the civilian workforce.

13. TOTAL CAPITAL AND START-UP COSTS AND TOTAL OPERATION AND MAINTENANCE COSTS.

There will not be any capital, start-up, or operation and maintenance costs.

14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT:

The estimated cost to the Federal Government is \$80,747.00. This amount is estimated as follows:

Cost Item	Total Responses No.	Cost Factor/Form (\$)	Total Cost (\$)
Cost of the Forms	2,565	0.10	\$257.00
Development and Storage	2,565	0.040	\$103.00
Work hour Costs	2,565	31.34	\$80,387.00
Total Costs (rounded)			\$80,747.00

Work hour costs associated with NRCS employees has been estimated to account for employees spending an average of 90 minutes per response, collecting, filing, and processing data on the form. The average hourly wage of an NRCS employee is \$31.34.

15. REASONS FOR CHANGES IN BURDEN:

The burden changed from 2,565 to 5,035 due to an increase in events and sponsor’s participation in the program.

16. TABULATION, ANALYSIS AND PUBLICATION PLAN:

The information collected on the Damage Survey Report (DSR) and Appendix for the Emergency Watershed Protection Program (EWPP) is for the performance of the Agency’s functions in administering the program, and is not to be tabulated or published in any way.

17. REASONS DISPLAY OF EXPIRATION DATE OF OMB APPROVAL IS INAPPROPRIATE:

While the cost of developing, printing, distributing, and storing the forms is estimated to only cost 10 cents per form, any funds expended on this should remain available for use in any future long term contracting opportunities. Therefore, approval to not display the expiration date for OMB approval is requested.

18. EXCEPTIONS TO 83-1 CERTIFICATION STATEMENT:

There are no exceptions to the 83-1 certification statement.

19. HOW IS THIS INFORMATION COLLECTION RELATED TO THE CUSTOMER SERVICE CENTER INITIATIVE? WILL THIS INFORMATION BE PART OF THEIR ONE-STOP SHOPPING OBJECTIVE?

Information will be collected at the local USDA Service Center from each project sponsors and/or individual landowners. This package represents all the information needed to process an application for assistance under the provisions of Section 216, Public Law 516. These forms are included in the Department's Freedom to E-File Initiative. These forms are posted on the USDA Common Service Center Website and are available for use. Current versions are available on the NRCS intranet.

The agency has been carefully considering how to reduce the administrative burden on USDA participants, as well as reductions within the agency and the Department. Consideration has been given to shared data resources, common computing platforms, and simplification of processes mandated by the various programs authorized by Congress through the Department. At the present time, shared databases are being used to obtain common data elements. This form utilizes some of the information that is available in other NRCS programs as well as other agency documents. The forms are also being used to record engineering designs, site plans, etc. of the sponsoring local organization, and thus, information sharing is being utilized, and the DSR has been automated for use by level 2 users on the USDA eGov Web site.