

41 Supporting Statement Part A

Nomination of Properties for Designation as National Historic Landmarks 36 CFR 65

OMB Control Number 1024-0276

Terms of Clearance: None.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The National Historic Landmarks program is authorized by the Historic Sites Act of 1935 (54 USC 300101 et seq.) which directs the Secretary of the Interior, through the National Park Service (NPS, we), to survey historic and archeological sites, buildings, and objects to determine those that possess exceptional value in commemorating or illustrating the history of the United States. In accordance with the law and 36 CFR Part 65, private citizens, businesses, Federal agencies (FPO), State and local public agencies, State Historic Preservation Officers (SHPOs), territories, and Indian tribes (THPOs) may submit nominations for National Historic Landmark (NHL) designation. An NHL is an historic building, site, structure, object, or district that represents an outstanding aspect of American history and culture. There are approximately 2,600 properties designated as NHLs.

Designation as an NHL:

- ensures that stories of nationally important historic events, places, or persons are recognized and preserved for the benefit of all citizens
- may provide the property's historic character with a measure of protection against any project initiated by the Federal Government
- may ensure eligibility for grants, tax credits, and other opportunities to maintain a property's historic character

Legal Authorities:

- *Historic Sites Act of 1935 (54 USC 300101 et seq.)* - Declaration of national policy. It is declared that it is a national policy to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States.
- *National Historic Landmarks Program (36 CFR Part 65)* - The purpose of the National Historic Landmarks Program is to identify and administer the designation process for National Historic Landmarks and encourage the long-range preservation of nationally significant properties that illustrate or commemorate the history and prehistory of the United States.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Instructions for submitting a letter of inquiry and completing NPS Form 10-934 are available on the NHL Web site at <https://www.nps.gov/subjects/nationalhistoriclandmarks/apply.htm>. We collect the following information:

Letter of inquiry

Prior to nominating a property for NHL designation, respondents must send a letter of inquiry to the NPS. The letter introduces the property to the NHL Program staff and serves as a formal, written record of initiating the NHL designation process. It provides an overview of the property, its historic significance, and its historic integrity, including, but not limited to:

- Historic importance of the property. What nationally significant story does the property tell?
- Current condition and integrity of the property. Has the property undergone major alterations since the historic period? If so, how extensive are these alterations?
- Support of the property owner. Is the property already listed in the National Register of Historic Places?
- Supporting documents, such as photographs or brochures.

Nomination

We use NPS Form 10-934 (National Historic Landmarks Nomination) to collect information on properties nominated for designation as an NHL. We review the forms to evaluate the eligibility of the property being nominated and submit them to the Secretary of the Interior's National Park System Advisory Board (NPSAB). The NPSAB recommends those properties that meet the criteria for NHL designation to the Secretary of the Interior. The Secretary decides whether or not to designate a property as an NHL.

The Secretary of the Interior's decision is based on: (1) the sufficiency of information provided in the forms and supporting documentation, such as photographs and maps that accompany the forms, and (2) the eligibility of the property when evaluated according to the NHL criteria. States, Federal agencies, Indian tribes, and others use the information in applying the Federal protections and rehabilitation incentives afforded properties designated as NHLs. The information is used for heritage education and interpretation to provide a tangible understanding of our common heritage. Historic context information in the forms also assists States and others in planning for the identification, evaluation, and protection of other related historic resources.

We collect the following information on NPS Form 10-934:

Name and Location of Property: Identifies the specific property being designated as an NHL according to the various names by which the property has been known. Although the

historic name is generally considered the official name of the property, the inclusion of other names provides an appropriate means of differentiating one property from other similarly named properties already designated as NHLs. It also assists the public and other users who may know the property by these other names. This section also identifies the geographic location of the property by street number, street, city, county, and state.

Significance Data: Applicable NHL criteria and criteria exceptions quickly link the property to the qualifying NHL criteria as specified in the regulations. NHL Themes, Period(s) of Significance, Significant Person(s), Cultural Affiliation, Designer/Creator/Architect/Builder, and Historic Contexts provide easy reference to the specific facts, dates, and associations that underscore the property's historic importance and relate it to the NHL criteria.

Sensitive Information: Identifies resources, such as archeological sites, that would be adversely affected by amateur excavation or vandalism by the general public, if the location were disclosed. In accordance with Section 304 of the National Historic Preservation Act, the NHL Program is allowed to withhold information on specific locations of properties that might risk harm to the historic resources, impede the use of a traditional religious site by practitioners, or cause a significant invasion of privacy by the release of such information.

Geographical Data: Provides information on the acreage, Universal Transverse Mercator (UTM) grid references or latitude/longitude coordinates, and boundaries for the property. Acreage, given to the nearest acre, specifies the size of the property. UTM or latitude/longitude references provide for one method of mapping and recording the geographical location of the property. The verbal boundary description specifies exactly what land is included and defines its legal boundaries for purposes of designation as an NHL. We also request a concise explanation or justification of how the boundaries and acreage were selected and discerned. Information in this block is essential for identifying exactly what property is being designated and for ensuring that the boundaries and acreage selected are appropriate to the property's historic significance.

Significance Statement and Discussion: Narrative statement based on documentary research of the property and the specific assessment of how the property qualifies for designation as an NHL relative to one or more NHL criteria and themes.

Property Description and Statement of Integrity: Classifies the property by ownership of the property, type of property, and the number and nature of resources comprising the property. This section quickly provides essential facts that relate the property to specific provisions of the NHL Program as outlined in the regulations. The narrative description of the historic and current physical appearance and condition of a property is important in making an accurate assessment of the high level of integrity needed for a property to be designated.

Major Bibliographic References: Sources from which the documentation given on the form was compiled and the assessment of the property's significance was made. This information is necessary to verify information given in the Significance and Description blocks. We also request information on 1) any previous documentation on file in the NPS, and 2) the location of additional documentation. This cross-referencing proves useful to tie documentation sources and administrative processes together regarding how the property has been evaluated previously.

Form Prepared by: Identifies the name, organization, address, phone number, and email of the person(s) directly responsible for compiling the information. This information enables NHL program staff to contact the person directly, if necessary. This block also contains the name, address, and telephone number of the NHL program staff member(s) responsible for reviewing and editing the nomination.

- 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 and specifically how this collection meets GPEA requirements.**

Forms are submitted in electronic format using a Word template that is provided by the NHL Program. The forms are not available online to ensure that potential nomination preparers do not expend the effort and time for a nomination until they have consulted with the NHL Program; the NHL Program staff also frequently edit the submitted content of the electronic form. Photographs are submitted as digital prints and on disk. Figures such as illustrations, floor plans, site plans and maps are submitted electronically. The submission of original, hard-copy United States Geological Survey (USGS) map marked with the Universal Trans Mercator points for the property under consideration is no longer a requirement. The electronic submission of these maps and other materials have proved more cost-effective, increased information accuracy, and reduced the burden of obtaining hard-copy maps.

- 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 Item 2 above.**

No similar information is collected by other NPS offices or other Federal agencies. Each property is unique, and the NHL criteria are unique, and each property must be assessed individually to determine if it meets NHL criteria.

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

We have carefully analyzed the collection requirements to ensure that the information requested is the minimum necessary. Nominations for successfully designated properties are available online to aid users in completing an NHL nomination. Further, NHL Theme Studies are also available online to facilitate the identification, evaluation, and designation of similar properties. In addition, NHL program staff is available to advise preparers. We encourage consultation at all steps of the process. We also allow the submission of digital images and maps as supporting documentation for nominations.

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.

We cannot collect the information less frequently. We only collect the information on occasion when someone nominates a property for designation as an NHL. If the information were not collected, it would not be possible to identify properties eligible for NHL designation, and to administer related Federal programs, such as required Advisory Council for Historic Preservation review and comment, Federal historic preservation tax incentives, Federal project planning, and various preservation grant programs. This information would not be available to local governments, States, Federal agencies, Indian tribes, and others in applying the Federal protections and rehabilitation incentives afforded properties designated as NHLs. This information would not be available for heritage education and interpretation to provide a tangible understanding of our common heritage. Nor would the information be available for us to use in advising Congress on potential National Park units and other federally recognized and owned properties. Information on historic contexts contained in NHL theme studies would not be available to assist localities, States, Federal agencies and Indian Tribes in planning for the identification, evaluation, and protection of their historic resources.

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

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data**

- security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication 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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On June 8, 2021, we published in the *Federal Register* (86 FR 30469) a notice requesting public comment on this information collection. The comment period ended on August 9, 2021. We did not receive any comments.

In addition to the Federal Register Notice, we contacted four cultural resource specialists and two Deputy State Historic Preservation Officers (Table 1) familiar with the on NHL nominations process. We asked them to give their best estimates on the time spent in preparing a National Historic Landmark nomination. An email reminder was sent to all non-respondents if we did not receive a response within the designated time frame.

	Title	Affiliation
1	Independent Consultant	Independent Consultant
2	Independent Consultants	Front Range Research Associates, Inc.
3	Independent Consultant	Independent Consultant
4	Senior Architectural Historian	The Public Archeology Laboratory, Inc.
5	National Register & Architectural Survey Coordinator	Connecticut State Historic Preservation Office
6	State Historian II, Registration Unit	California State Historic Preservation Office

Specifically, we asked for comments on:

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary.”

Comment 1: *The collection is necessary for a thorough evaluation of properties in the overall nomination process. Collection aids preparers of future nomination in the comparison process, assists local and state agencies in reviewing work projects, and aids federal agencies in the Section 106 process. All the information is pertinent.*

Comment 2: *If one is not going to designate NHLs by arbitrary fiat or political whim, then there must be some means of assessing the merit of potential NHLs. The current form serves that purpose by assuring that the resource meets the stated criteria. Beyond that, the information in a well-prepared nomination provides a solid foundation for resource interpretation, supports heritage tourism, and assists in obtaining grants for stabilization, renovation, and adaptive reuse of listed resources. We believe the current form covers what is needed without requiring adding unnecessary material. Of course, this is said from the perspective of decades in the National Register program, which follows a quite similar structure. It would be interesting to see what is required in other countries for nationally significant resources without a similar institutional structure.*

Comment 3: *Most of the information collected on the NHL nomination form is necessary and has practical utility. However, I do not understand the purpose of the “Location of Additional Data” since sources must be cited and there is a bibliography.*

Comment 4: *Yes, the information is necessary and practical and no there are no questions that are unnecessary.*

Comment 5: *Since these forms are used to justify national importance of places and contribute to their interpretation and preservation, the level of information currently required is necessary. To enhance the user-friendliness for the general public, a plain-language cover page would be nice (something like the executive summary used for committee meetings) that simply states why the property is important before the technical jargon is introduced. You could keep the criteria checkbox page behind it but have a simple paragraph on the front that tells the general population what the property is. Our regular CRM consultants feel the location, description narrative, photographs, research, history narrative, sources, and significance assessment sections are necessary in order to understand the resource and why it is significant. Some professional consultants who complete NHLs in more of a pro-bono capacity (or for non-profits with limited funds) feel that the standards for the description section have increased and is a burden. However, accurate and thorough description is critical when making technical preservation decisions. One solution may be just to refer back to the National Register nomination if a recent update was completed.*

Comment 6: *Yes, the information is necessary and yes there is practical utility for the information. No there are no questions that are unnecessary.*

NPS response/Action Taken:

We have used information from recently listed or updated National Register nominations when appropriate. Many properties being nominated for NHL designation have not been listed on the National Register or do not have current or updated documentation.

“What is your estimate of the amount of time it takes to complete each form in order to verify the accuracy of our estimate of the burden for this collection of information?”

Comment 1: *For a prelim and final draft, not including review periods:*

Simple nomination: 320 hours (40 days)

Complex nomination: 1,280 hours (160 days)

Comment 2: *This is always a difficult question and is perhaps better presented as the amount of time to “prepare” a NHL nomination form from start to finish, including determining a methodology, research, fieldwork, interviews, writing, initial staff and interested parties’ reviews, peer reviews, revisions, executive summary and PowerPoint and presentation to the Landmarks Committee. In addition to the simple/complex dichotomy you posit, we have found other factors that impact the time involved, including: 1) is there a recent, well-prepared NRHP nomination form? (we’ve sometimes prepared NHLs for resources with no existing designation, which is challenging without such a baseline) and 2) is there a well-prepared Letter of Inquiry that clearly states the relevant criteria, Period of Significance, boundary, and succinctly identifies relevant comparative properties? (in some cases, recent Letters of Inquiry have not met these criteria). These estimates do not include travel expenses for fieldwork or for the National Historic Landmarks Committee meeting.*

A) Simple nomination: 250 hours.

B) Complex nomination: 370 hours.

Producing estimates for nominations for “typical” resources is challenging given the great variations in what one encounters once the project begins.

Comment 3: *I tabulated the hours spent on each of the six nominations that I prepared in the past five years. Not including time spent preparing the National Historic Landmarks Committee materials and completing revisions required by the National Historic Landmarks Committee, the number of hours per nomination ranged from 238 to 713. The three that took the least time (between 238 and 306 per nomination) were for properties that were nominated for association with a nationally significant individual. Two others that were nominated for significant association with broader historical trends took about 415 hours each; for both of these, the historic context was fairly narrowly*

defined and/or documented in an NHL Theme Study. One nomination, which engaged a region-wide and multi-faceted historic context that was under-developed in existing scholarship, and which documented a single property that contained a large number of resources, took 713 hours.

Comment 4: *Relatively straightforward nominations for a single resource required 300–400 hours of writing. More complex nominations for a district or property with multiple criteria can range from 600 hours of writing to 1,500 hours for something like the Blue Ridge Parkway.*

Comment 5: *Professionals who have written multiple NHLs have expressed that it takes at least 400 hours of research and writing time for single property nominations and more than 600 hours for more complex properties. Hours vary depending on when a consultant is engaged in the process since there are multiple phases (Letter of Inquiry, internal NPS draft, external peer review draft, and final committee draft).*

NPS response/Action Taken:

Based on the comments in this section and previous submissions we established the average response burden to be 588 hours.

“Do you have any suggestions for us on ways to enhance the quality, utility, and clarity of the information to be collected?”

Comment 1: *It might be helpful to post good examples of successful nominations that reflect different criteria, challenges, or innovations for preparers to examine, with a discussion by WASO staff as to what each does well. The staff used to do webinars on various NHL topics. This would be useful to reinstate, record, and have available on demand.*

Comment 2: *In “Previous Documentation on File,” it would be helpful to have a space to provide more detailed information about previous National Register listings and identify eligible National Register areas and periods of significance. Previous National Register listings often not only do not acknowledge the property’s NHL significance but also do not acknowledge aspects of its National Register significance. Sometimes the property was listed as part of a district and the property’s individual significance was not covered, while in other cases, the property has an older nomination that is very limited in scope. Research for the NHL can uncover additional layers of local or statewide significance that were not documented in the NR nomination, but also are fully explored in the NHL nomination because they do not rise to the level of national significance. Adding a place to note listed and eligible NR areas, levels, and periods of significance would make the document more useful for SHPOs, for federal agencies conducting Section 106 or Section 110 review, and for future updates to the NR nomination.*

Comment 3: *The latest version of the form is a big improvement over the older version. However, the need to justify each criterion and area of significance separately can result in a choppy and repetitious narrative. The guidance should provide the author with more latitude to construct a narrative that discusses the different aspects of significance where it makes the most sense, rather than in separate sections, more like the National Register nomination allows. For instance, it might be appropriate to discuss architecture and landscape architecture at the same time or to address an association with an important person under Criterion II together with a discussion of a significant event under Criterion I. The Introduction in Section 5 could summarize how the property meets the criteria under each area of significance and justify the period of significance. Then the historic context, site development, themes, and other information could be presented in a more narrative form.*

Comment 4: *Ensure that the headers and sub headers, which direct the reader, are clear. Place a non-technical (no jargon or criteria) cover page on top that is approachable for someone not familiar with nominations to understand. The change to call this an NHL form in the document header is helpful (rather than calling it an NHL nomination on an NR form). It was also helpful to move the significance narrative up front to get to the main point faster.*

Comment 5: *None. I'm pleased to see the guidance offered on the website with regard to formatting and style, e.g., use of The Chicago Manual of Style.*

NPS response/Action Taken:

Several of the comments deal with either the guidance the NHL Program provides to users or the organization of the textual material within the nomination. These suggestions don't affect the information being asked for in the nomination. The program can address these comments with revised guidance. The additional information requested in the third comment concerning the section on "Previous Documentation on File" is already collected in another section. However, in the future the organization of the sections could be rearranged to emphasize the information the commentator wants made more prominent. The fifth comment concerns adding a simple straightforward overview of the material in the nomination as a potential cover page. This could be easily accomplished in the future without requiring extra work on the part of a preparer.

"Do you have any suggestions on ways to minimize the burden of the collection of information on respondents"

Comment 1: *Part of the burdensome nature (more so than for NRHP nominations) lies in the inherent nature of the NHL program, which recognizes resources of national*

significance. This implies a higher threshold for designation and a corresponding greater effort necessary to make the case for a resource.

Comment 2: *The burden is largely related to the property type and the number of areas under which it is significant, not the form itself. It should be demanding to list a property as an NHL, because that status should be reserved for properties where national significance can be clearly justified. However, guidance aimed at tightening arguments and making significance statements more efficient and concise (as opposed to hundreds of pages of text) would be helpful. Perhaps some examples of the kinds of information that are **not** necessary to include would help, along with a list of the key questions that must be answered to justify significance and provide sufficient context.*

Comment 3: *Since NHLs are places of national importance, reducing the level of scholarship and documentation in the NHL nomination would not be beneficial because this information is frequently used in the interpretation, management, and treatment of the property. The national theme studies are helpful because they reduce some of the research burden for comparing a property to the national context. You could reduce the nomination author's effort in some cases, by allowing for referencing of adequate recent National Register nominations. You could reference this information in the other document, rather than restate it, particularly for the description. This would likely not reduce the NPS staff time involved in guiding and editing an NHL nomination though.*

Comment 4: *Might there be a way to streamline the process for properties already listed on the National Register of Historic Places at the national level of significance?*

NPS response/Action Taken:

Several of the comments deal with assistance on providing text in a nomination so the NHL Program can address this by providing more guidance for preparers through our website. Better guidance would also include information on using National Register nominations to assist in the writing of NHL nominations.

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

We do not provide any payments or gifts to respondents. After the Secretary of the Interior designates an NHL, we do provide a bronze plaque, free of charge, bearing the name of the property and its year of designation. This plaque attests to a property's national significance. The plaque is presented to the owners who then display it publicly and appropriately. We also provide a certificate recognizing the property's designation as an NHL.

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

Section 304 of the National Historic Preservation Act, as amended, allows us to withhold from disclosure to the public information about the location, character, or ownership of an historic resource, if such disclosure might cause a significant invasion of privacy, risk, or harm to the historic resources or impede the use of a traditional religious site by practitioners. The only information collected that could be considered confidential in nature is the location of specific properties, their traditional cultural use, and the informants, such as tribal elders, who may testify in the nomination documentation to their cultural importance. Although this information is reported on the form, and necessary to establish precisely which property is designated and why, the NPS maintains the confidentiality of certain specific information to protect properties. This is particularly the case with many archeological sites and certain properties that are subject to vandalism. It is also the case with places used in traditional cultural practices.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

We estimate that we will receive about 50 responses annually totaling 10,360 burden hours. We estimate the dollar value of the burden hours to be \$98,247 (rounded). We used the Bureau of Labor Statistics news release [USDL-21-2146](http://www.bls.gov/news.release/pdf/ecec.pdf), December 16, 2021, Employer Costs for Employee Compensation—September 2021 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), to determine hourly wages and calculate benefits to prepare initial letters of inquiry.

- Individuals - We used the wage and salary costs for all workers from Table 1, which states hourly rate including benefits is \$39.55.
- Private Sector - We used the wage and salary costs for all workers from Table 4, which states hourly rate including benefits is \$37.24
- State and Local Government - We used the wage and salary costs for all workers from Table 3, which states hourly rate including benefits is \$54.46.
- To prepare a nomination, we used the average consultant fee of \$95 per hour We estimate that it will have an average of 558 hours per respondent per nomination.

Table 12.2: Estimated cost based on the hour burden of the collection

Requirement	Annual Number of Responses	Completion Time (hours) Per Response	Total Annual Burden Hours	Hourly Rate Including Benefits	\$ Value of Annual Burden Hours
Letter of Inquiry					
Individuals	3	2	6	\$39.55	\$237
Private Sector	7	2	14	\$37.24	\$521
State and Local Government	10	2	20	\$54.46	\$1,089
Nominations					
Individuals	5	344	1,720	\$95	\$163,400
Private Sector	10	344	3,440	\$95	\$326,800
State and Local Government	15	344	5,160	\$95	\$490,200
Totals	50		10,360		\$982,247

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

We have not identified any non-hour cost burden.

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.

We estimate that the annual cost to the Federal Government to administer this collection will be \$893,569. We base this on staff time to process, review, and edit nominations and to administer the information collection. We used the Office of Personnel Management Salary Table [2022-DCB](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf) (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf) to determine hourly wage rates. To calculate benefits, we multiplied the hourly rate by 1.6, in accordance with BLS News Release [USDL-21-2146](http://www.bls.gov/news.release/pdf/ecec.pdf). (<http://www.bls.gov/news.release/pdf/ecec.pdf>). We estimate:

Table 14.1. Annualized cost to the Federal government

Position	GS Level	Hourly Rate	Hourly Rate incl. benefits (1.6 x hourly pay rate)	Estimated time (hours)	Annual Cost*
Historian	12/ 5	\$48.78	\$78.05	520	\$40,586
Historian	12/5	\$48.78	\$78.05	1,248	\$97,406
Historian	12/5	\$48.78	\$78.05	1,872	\$146,110
Historian	12/5	\$48.78	\$78.05	1,872	\$146,110
Historian	13/5	\$58.01	\$92.82	416	\$38,613
Historian	13/5	\$58.01	\$92.82	832	\$77,226
Historian	13/5	\$58.01	\$92.82	1,872	\$173,759
Historian	13/5	\$58.01	\$92.82	1,872	\$173,759
				Total	\$4633573,569

*Rounded

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no program changes.

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.

A list of properties designated as NHLs is available online through the NHL Web site. This list is used by State, Federal, tribal, and local governments; libraries; historical organizations; educators, scholars; and other institutions and individuals as a record of properties designated as NHLs. In addition, a copy of the final approved nomination form for the NHL property is available online through the NHL web site.

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.

We continue to request permission to not display the expiration date on the forms. A nomination process (e.g., research, writing, review, and editing) may take several years to complete before they are submitted to the NPS. Displaying the expiration date may cause confusion when the historical documentation is still valid and useable.

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

There are no exceptions to the certification statement.