



Baucum, Madonna <[madonna\\_baucum@nps.gov](mailto:madonna_baucum@nps.gov)>

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## Comments re: "Federal Register notice for NR Form renewal

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**Beall, Edson** <[edson\\_beall@nps.gov](mailto:edson_beall@nps.gov)>  
To: [madonna\\_baucum@nps.gov](mailto:madonna_baucum@nps.gov)

Mon, Jul 13, 2015 at 8:12 AM

**From:** Craig, Bob  
**Sent:** Friday, July 10, 2015 4:57 PM  
**To:**  
**Cc:** Saunders, Dan; Marcopul, Kate  
**Subject:** Comments re: "Federal Register notice for NR Form renewal ..."

Ms. Baucum,

For most of the items covered in the tables of estimates, the New Jersey Historic Preservation Office does not collect information on a systematic basis.

The office does not collect information about the estimated hours needed to complete nominations, but the lowest of the estimates provided seem too low.

It would seem unlikely that any nomination in recent years has taken as few as 100 hours to complete. The upper-level estimates, 230–280 hours, seem more plausible on the basis of anecdotal information, but HPO collects no figures on this question. It is not altogether unusual for exceptionally difficult (and important!) nominations to require several hundred hours of work from start to finish. Length of time to completion is information that only the preparers of nominations will have, and HPO does not make efforts to solicit this information.

Most nominations of all types are submitted by consultants. Among the nominations most recently processed by HPO, approximately 83% were prepared by consultants (34 of 41). Some of the remaining seven nominations required extensive HPO staff time.

Form 10-900 and Form 10-900a should be considered as a unit; no attempt to parse out separate hours to complete each would be meaningful. It would be useful to consider the completion times required to complete 10-900 and 10-900a as a unit when a) there is a Multiple Property Documentation Form cover document; and b) when there is not. Under a) the times to complete 10-900 and 10-900a should consistently be much shorter. HPO, however, does not collect information to answer these questions.

Under "Individual Nominations Submitted ... by Consultants ..." a fairer estimate of FFY annual submission to HPO would prob. be 15 (reduced from previous years). No information about hours to complete.

For "District Nominations Submitted to ... by Consultants ..." a fairer estimate ... would be 4-5. No information about hours to complete.

For "Nominations Submitted under Existing MPS Covers ... by Consultants ..." a fairer estimate is 3 during the current FFY, and this number is likely to grow in coming years. No information about time for completion.

For "Newly Proposed MPS Cover Document ... by Consultants ..." a fairer annual estimate would be 1.

Observable trends:

- closer connection between survey and registration programs will be needed in future and is likely.
- Registration program will likely benefit from increases in participation in Certified Rehabilitation Program.
- MPS nominations, where they can be used, provide best approach to contain high costs of preparation.

Bob Craig

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Thank you for your interest in the preservation programs of the National Park Service.

Sincerely,

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