# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**Natural Resource Damage Assessment Restoration Project Information Sheet**

**OMB Control No. 0648-0497**

# Abstract

This request is for renewal of a currently approved information collection. The purpose of this information collection is to assist state and federal Natural Resource Trustees in more efficiently carrying out the restoration planning phase of Natural Resource Damage Assessments (NRDA), in compliance with the National Environmental Policy Act of 1969, 42 U.S.C. 4321-4370d; 40 CFR 1500-1500 and other federal and local statutes and regulations as applicable. The NRDA Restoration Project Information Sheet is designed to facilitate the collection of information on existing, planned, or proposed restoration projects. This information will be used by the Natural Resource Trustees to develop potential restoration alternatives for natural resource injuries and service losses requiring restoration, during the restoration planning phase of the NRDA process. This information is provided by the public on a voluntary basis. The information provided benefits the public by informing the NRDA restoration process. However there are no individual benefits that depend on the submission of information. Individuals can update the information as needed, but there is no required update frequency.

# Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This request is for an extension of a current information collection.

The purpose of the collection of this information is to assist state and federal Natural Resource Trustees in more efficiently carrying out the restoration planning phase of Natural Resource Damage Assessments (NRDA), in compliance with the National Environmental Policy Act of 1969 ([NEPA](https://www.fsa.usda.gov/Internet/FSA_File/nepa_statute.pdf)), 42 U.S.C. 4321-4370d; [40 CFR 1500](http://www.ecfr.gov/cgi-bin/text-idx?SID=9a559bf51916340b30b84bbceb2c3198&tpl=/ecfrbrowse/Title40/40cfr1500_main_02.tpl) and other federal and local statutes and regulations as applicable. Currently, when a release or substantial threat of release of oil occurs and a NRDA is conducted, state and federal Natural Resource Trustees carry out three phases: pre-assessment, restoration planning, and restoration implementation. Traditionally, the restoration planning phase is time-consuming and expensive because Trustees must contact numerous government agencies, as well as private groups, non-governmental organization and non-profit organizations to develop a list of restoration project alternatives for each incident, a requirement before selecting suitable projects(s) to compensate the public and environment for lost services and resources. Restoration project information sheets facilitate the collection of information on a continual basis, thereby markedly shortening the time needed to generate a list of restoration alternatives following each incident. By reducing the time needed to conduct the restoration planning phase of a NRDA, the entire NRDA process becomes more efficient and habitat restoration projects will be implemented sooner.

# 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.

The purpose of the NRDA Restoration Project Information Sheet is to collect information on existing, planned, or proposed habitat restoration projects in a localized region. The NRDA Restoration Project Information Sheet will be provided in two formats to facilitate the information collection needs of the following: 1) the Louisiana Regional Restoration Planning program will use the original format since this form was developed specific to this program,

2) National Oceanic and Atmospheric Administration (NOAA) Fisheries Damage Assessment Remediation Restoration Program (DARRP) will use the fillable, trackable PDF format for NRDA restoration planning process, since it will feed directly into a database and therefore is more robust for data management purposes.

The two formats for the NRDA Restoration Project Information Sheet will collect the same information, which includes:

(a) Contact Information – Basic details necessary to identify and contact project managers such as name, title, address, organization, city state, zip code, phone and fax numbers, e-mail and URL for Web sites.

(b) Project Information – Basic project information such as the project title, size, cost, and details on the physical location of the project site including Parish/County, watershed, and latitude/longitude.

(c) Project Categories – Respondents have the opportunity to provide categorical identifications of project types, habitats, and resource benefits to easily describe projects.

(d) Project Status – Basic information indicating the status of certain phases of the project, such as resource acquisition, planning/design, and permitting.

(e) Description and Benefits – A detailed description of the project with background able the site as well as other potential benefits.

(f) Project Partners – Details on support (e.g., planning, funding, technical assistance) provided by other organizations including partner name, contact information, and involvement.

The information collected by the NRDA Project Information sheets is available to the public on-line at <http://www.losco.state.la.us/>, <http://www.gulfspillrestoration.noaa.gov/>, and <http://www.darrp.noaa.gov/>.

The information collected from these forms will be used by NOAA staff and other federal and state agencies to occupy a database on an ongoing basis. Following the release or substantial threat of release of oil (hereafter referred to as incident), NOAA staff and other state and federal agencies may query the database to identify potential restoration projects suitable for compensating the public and environment for the loss of services and/or resources as a result of the incident. Queries for potential projects may also be made by non-profit organizations and members of the public. The frequency of queries by agencies, organizations, and the general public will depend on the number of incidents or interest in habitat restoration.

NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See Question 10 for information about confidentiality. The information collection is designed to yield information that meets all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](http://www.fws.gov/informationquality/section515.html).

1. **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.**

The Natural Resource Damage Assessment Restoration Project Information Sheet will be provided to government agencies, private organization, non-governmental organizations, and the general public as a hard copy and is also be available from the internet at <http://www.losco.state.la.us/>, <http://www.gulfspillrestoration.noaa.gov/>, and <http://www.darrp.noaa.gov/>. It may be developed on a personal computer (if desired); however, while electronic submission of the information is allowed, it is not required. The NRDA

Information Sheet is available as a web-based fillable form that can be submitted online, or saved and used to produce subsequent project submission.

1. **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 Question 2**

There are no other collections that gather similar information. No duplication of effort exists with other Federal Government information collection efforts.

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

The information to be collected is very basic in its nature and should not be hardship or burden for small entities to produce. A pre-formatted PDF of the data fields is provided to assist in the collection of information prior to being entered into the database. Separate requirements based on the size of the business or entity has not been developed.

1. **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.**

This information is critical in order to pursue cost-effective planning and implementation of restoration projects. Without this information, the Trustees would need to independently request project submission ideas which could take a significant amount of time and resources.

1. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**

There are no special circumstances for this information collection.

1. **If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register Notice published on August 16, 2022 (87 FR 50292) solicited public comment on this renewal request. A comment was received but it was determined to be outside of the scope of the collection.

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

No payments, gifts, or other remuneration will be provided.

1. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

The information collection does not request any proprietary or confidential information. No confidentiality is provided.

1. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

No questions of a sensitive nature are asked.

1. **Provide estimates of the hour burden of the collection of information.**

The three-year burden for this collection is estimated to be 300 hours (annualized to 100 hours) as detailed below. It is estimated that approximately 100 respondents will annually submit completed Natural Resource Damage Assessment Restoration Project Information Sheets with each respondent submitting an average of 1 to 2 Information Sheets for individual projects. It is estimated that approximately 300 annual responses will be received. At an estimated response time of 20 minutes each, this yields an estimate of 100 burden hours. Respondents can update their project submission any time once it has been entered into the database. It is expected that approximately 49% of submissions will be updated annually (44). At an estimated response time of 10 minutes each, this yields an estimate of 7 burden hours.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Type of Respondent (e.g., Occupational Title)** | **# of Respondents**  **(a)** | **Annual # of Responses / Respondent**  **(b)** | **Total # of Annual Responses**  **(c) = (a) x (b)** | **Burden Hrs / Response**  **(d)** | **Total Annual Burden Hrs**  **(e) = (c) x (d)** | **Hourly Wage Rate (for Type of Respondent)**  **(f)** | **Total Annual Wage Burden Costs**  **(g) = (e) x (f)** |
| Natural Resource Damage Assessment Restoration Project Information Sheets | All Occupations | 100 | 3 | 300 | 20min | 100 | 28.01 | 2801.00 |
| Information Sheets Updates | All Occupations | 44 | 1 | 44 | 10 min | 7 | 28.01 | 196.07 |
| **Totals** |  |  |  | **344** |  | **107** |  | **2997.07** |

1. **Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

No capital or start-up costs are expected to result from this collection by the respondents.  Operations and maintenance costs are expected to be limited to Internet and computer access.  It is expected that existing computer equipment and Internet connections will be used by respondents at little to no additional cost.  Furthermore, it is expected that all respondents will submit the NRDA Project Information sheet using the web-based data entry form, though paper submission is still possible.  If the information is submitted via electronic mail, this collection will incur no cost burden on respondents beyond the costs of response time.

1. **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.**

One full-time employee (FTE) will devote approximately 10% of his/her time annually for oversight, QA/QC, and data imports. One contractor will devote 10% of his/her time to implement changes and maintain the application. With an annual average salary of $80,000 for an FTE at 10% time ($8,000), and an annual salary for a contractor of $75,000 at 10% time ($7,500), the annualized cost to the Federal government to conduct this information collection is estimated to be $15,500. No significant equipment, overhead, printing or other costs should be involved with the processing of this information collection.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Cost Descriptions** | **Grade/Step** | **Loaded Salary /Cost** | **% of Effort** | **Fringe (if Applicable)** | **Total Cost to Government** |
| **Federal Oversight** | ZPII/Band 2 | $80,000 | 10% |  | $8,000 |
| Other Federal Positions |  |  |  |  |  |
| **Contractor Cost** |  | $75,000 | 10% |  | $7,500 |
|  |  |  |  |  |  |
| **Travel** |  |  |  |  |  |
| **Other Costs:** |  |  |  |  |  |
| **TOTAL** |  |  |  |  | **$15,500** |

1. **Explain the reasons for any program changes or adjustments reported in ROCIS.**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Respondents** | | **Responses** | | **Burden Hours** | | **Reason for change or adjustment** |
| Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision |
| Natural Resource Damage Assessment Restoration Project Information Sheets | 100 | 100 | 344 | 300 | 107 | 100 | No changes |
| Information Sheets Updates | 44 | 44 | 44 | 44 | 7 | 7 | No changes |
| **Total for Collection** | **100\*** | **100\*** | **344** | **344** | **107** | **107** |  |
| **Difference** | **0** | | **0** | | **0** | |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Labor Costs** | | **Miscellaneous Costs** | | **Reason for change or adjustment** |
| Current | Previous | Current | Previous |
| Natural Resource Damage Assessment Restoration Project Information Sheets | 2801.00 | 2498.00 | 0 | 18 | Updated Labor Costs using current BLS Occupational Employment Data. Reduced Misc costs as no paper submissions are anticipated. |
| Information Sheets Updates | 196.07 | 174.86 | 0 | 0 | Updated Labor Costs using current BLS Occupational Employment Data. |
| **Total for Collection** | **2997.07** | **2672.86** | **0** | **18** |  |
| **Difference** | **324.21** | | **-18** | |  |

1. **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.**

All data collected will be available in table form which provides a basic project description or on the internet. Proposed projects which include latitudinal and longitudinal coordinates are displayed on a map and project list. Projects which did not include the aforementioned detail are only available to view from the project list. Tabulation project descriptions include title of project, state, county/parish, and link to view the data collected from the Natural Resource Damage Assessment Project Information Sheet.

1. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date will be displayed on forms.

1. **Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions."**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).