SUPPORTING STATEMENT

U.S. Department of Commerce

National Oceanic & Atmospheric Administration Coastal and Marine Ecological Classification Standard Solicitation for Revisions OMB Control No. 0648-0799

SUPPORTING STATEMENT PART A -

Abstract

This is a request for renewal of an approved information collection.

The Coastal and Marine Ecological Classification Standard was endorsed as a national standard by the Federal Geographic Data Committee (FGDC) in 2012 (FGDC-STD-018-2012). The FGDC requires periodic reviews and updates to federal standards. This voluntary electronic form will allow for data collection and suggestions for revisions from the user community.

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.

The FGDC requires periodic reviews and maintenance of federal standards. Collection of information from users is critical to this process.

NOAA's Office of Coastal Management (OCM) is conducting an information collection that allows interested parties to submit requests for revisions to update the Coastal and Marine Ecological Classification Standard (CMECS). CMECS was approved by the Federal Geographic Data Committee (FGDC) in August 2012 and provides a national standard for consistent descriptions of coastal and marine ecological features. The primary uses of CMECS are in mapping and classifying the geological, physical, biological, and chemical components of the environment. Among other applications, the CMECS framework can be used to integrate data from disparate sources, facilitate comparisons among sites, and organize data for regional assessment. Since its publication in 2012, the CMECS has been used to characterize habitats ranging from coastal wetlands and estuaries to the deep ocean and at local to global scales. Benefits of CMECS include: data collected by different sensors and methods can be integrated into a single database; all the physical, biological, and chemical-forcing functions that collectively determine a habitat type can be captured; and the system has the flexibility to accommodate new units as additional information becomes available.

The CMECS was developed as a dynamic standard to allow periodic revisions to continue to meet the needs of the user community and as such, the CMECS can be updated to accommodate the requirements of evolving scientific practices, technology, and coastal and marine resource management. The review process allows the CMECS to retain its consistency, credibility, and rigor through periodic reviews and an orderly, authoritative, and transparent updating process as required by the Federal Geographic Data Committee. Anyone can propose changes, which can include minor edits, such as grammatical or typographical corrections, clarifications of definitions and meaning, or more substantial changes to the hierarchy within components. The CMECS Implementation Group, through the Office for Coastal Management, has determined it is necessary to initiate the dynamic standard process to revise the CMECS. We are soliciting recommendations for revisions to the CMECS through a form to be posted on the CMECS website. All recommendations collected will be reviewed and revisions will be made to

the CMECS to reflect those recommendations found to be valuable for implementation of the CMECS and supportive of the user community needs.

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.

Information will be collected from volunteers who are interested in changes to the CMECS standard via a web form. This is the preferred method of collecting this information since the form walks the submitter through the necessary information, though paper forms are accepted as well. Information will be compiled quarterly by the CMECS Implementation Working Group, an interagency group of CMECS technical experts. This information will be used to assess needs for revisions to the CMECS. Information will not be disseminated to the public.

Report contents:

Mandatory information

- 1. Respondent's email address
- 2. Respondent's name and affiliation
- 3. Type of change proposed
- 4. Primary CMECS setting or component
- 5. Description of proposed change
- 6. Justification for proposed change
- 7. Geographic range of proposed change
- 8. Final check confirmation

Voluntary information

- 1. Co-respondent's names and affiliations
- 2. Attached documentation
- 3. Option to volunteer as a reviewer
- 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.

This information will be collected by an electronic form posted on the CMECS website. However, we will also accept paper format for anyone unable to access the form through the internet. Some follow up interviews may occur to better understand recommendations as needed.

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 Question 2

The information being requested is not currently collected by any other source or any other format.

5. If the collection of information impacts small businesses or other small entities, describe any

methods used to minimize burden.

It is unlikely that small businesses will be involved in this information collection. Primary respondents will be researchers from academic institutions and coastal resource managers within federal, state, and tribal government institutions. The change request form has been simplified with dropdown menus and minimal open-ended fields to reduce burden for respondents.

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.

If this collection is not conducted, NOAA will be unable to properly assess the need for revisions to CMECS. The CMECS was developed as a dynamic standard to allow periodic revisions to continue to meet the needs of the user community and as such, the CMECS can be updated to accommodate the requirements of evolving scientific practices, technology, and coastal and marine resource management. The review process allows the CMECS to retain its consistency, credibility, and rigor through periodic reviews and an orderly, authoritative, and transparent updating process as required by the Federal Geographic Data Committee.

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

OMB guidelines

- requiring respondents to report information to the agency more often than quarterly;
 - There is no need, requirement, or expectation that respondents report information more often than quarterly. Most respondents report information less than once a year.
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - There is no need, requirement, or expectation for respondents to prepare a written response in fewer than 30 days after receipt of it.
- requiring respondents to submit more than an original and two copies of any document;
 - There is no need, requirement, or expectation for respondents to submit more than an original and two copies of any document. All submissions to date have been electronically submitted.
- requiring respondents to retain records, other than health, medical, government contract, grantin- aid, or tax records for more than three years;
 - There is no need, requirement, or expectation for respondents to 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;
 - No, this is not a statistical survey.
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - No, this is not a statistical study.

- 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
 - There is no need, requirement, or expectation for respondents to include a pledge of confidentiality.
- 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 is no need, requirement, or expectation for respondents to submit proprietary trade secrets, or other confidential information. CMECS is based on open science standards and cannot incorporate proprietary information.
- 8. 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 was published on June 26, 2024 (0648-0799), to solicit public comments. No comments were received.

The form was circulated for review to the CMECS Implementation Group, which includes USGS, NOAA, BOEM, and NPS, on the usefulness of the information you collect, clarity of instructions and whether burden and cost are accurate and reasonable. No comments were received from this group.

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

No payment or gift is provided under this program.

10. 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.

No confidentiality is provided to the respondent. This information will not be disseminated to the public. The only personally identifiable information collected is the respondent's name, e-mail address, and affiliation, all of which are available in the public domain.

11. 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.

This information collection does not involve information of a sensitive nature.

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

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents/year (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)
Coastal & Marine Ecological Classification Standard	Academic Researchers and Coastal Resource							
Solicitation for Revisions	Managers	100	1	100	1	100	\$28.85	\$2,885.00
Totals				100		100		\$2,885.00

^{*} The hourly wage rate for mid-level coastal resource managers and post-doc researchers was obtained from BLS's *Occupational Outlook Handbook* https://www.bls.gov/bls/blswage.htm

13. 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).

There is no cost to the respondent or record keepers as a result of this information collection. The solicitation for revision is submitted online.

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.

Federal government costs only include the labor of employee monitoring the CMECS responses and cataloging them into the appropriate categories to be addressed in routine updates to the standard. This is a fairly simple task that takes a few minutes to complete. No materials, travel, or contractor services are required.

The Commerce Alternate Pay System (CAPS) pay tables were used to determine the base salary. (https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf) The Rest of U.S. locality rate was used since NOAA employees are geographically dispersed. A 1.5 multiplier was used to calculate the loaded salary.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4	\$238,290	10%		\$23,829
Other Federal Positions					
Contractor Cost					
Travel					
Other Costs:					
TOTAL					\$23,829

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

There have been no changes to the information collection since the last OMB approval.

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.

It is anticipated that results will be published through the Federal Register in the form of a revised CMECS. NOAA Office for Coastal Management 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 response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to

yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

The agency certifies compliance with <u>5 CFR 1320.9</u> and the related provisions of <u>5 CFR 1320.8(b)(3)</u>.