

# 1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## HydroAdd Tool OMB Control Number 1028-1029

**Terms of Clearance:** OMB approved this information collection on 01/07/2022 with the following terms of clearance: Approved with change.

### Justification

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

The mission of the National Geospatial Program (NGP) is to provide National topographic information to advance science, support government, enlighten citizens, and enable decision making. The NGP provides a foundation of digital geospatial data representing the topography, natural landscape, and manmade environment of the United States. Accessible through The National Map Data Download, customers can incorporate NGP geospatial products and services into their decision making and operational activities.

NGP is the OMB A-16 National Geospatial Data Asset Co-lead for the Water-Inland Theme, including the National Hydrography Dataset (NHD), National Hydrography Dataset Plus High Resolution (NHDPlus HR), Watershed Boundary Dataset (WBD), and 3D Hydrography Program (3DHP) which is currently in development. OMB Circular A-16 provides direction for Federal agencies to “coordinate work in partnership with federal, state, tribal and local government agencies, academia and the private sector to efficiently and cost-effectively collect, integrate, maintain, disseminate, and preserve spatial data, building upon local data wherever possible.” Executive Order 12906<sup>1</sup> accompanies Circular A-16. Geospatial Data Act of 2018 (GDA)<sup>2</sup> puts all the previous Circular A-16 (revised 2002) into law.

The U. S. Geological Survey (USGS) manages the NHD, WBD, NHDPlus HR, and 3DHP. In 2016 USGS completed the National Hydrography Requirements and Benefits Study to review and understand current and future user requirements and the associated benefits for improved hydrography data. Over 500 USGS hydrography data users from local, state, Federal, and Tribal governments, nonprofit organizations, academia, and the private sector participated in the study. Eighty-two percent of the agencies said that they would use web-based tools with a quick and easy way to identify errors and submit proposed changes to the national datasets. The study also suggested that open source and crowdsourced data editing will improve data quality.

The Hydrography Addressing Tool (HydroAdd) is a web -based GIS tool built by the USGS. HydroAdd supports users by providing a mechanism for referencing, or *addressing*, diverse external datasets to the NHD. As an example, a user could use HydroAdd to reference the geographic locations and other details of field observations of fish presence to the NHD.

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<sup>1</sup> [https://www.fgdc.gov/policyandplanning/executive\\_order](https://www.fgdc.gov/policyandplanning/executive_order)

<sup>2</sup> <https://www.fgdc.gov/gda>

HydroAdd provides a framework for the management of the addressed data. HydroAdd also enables upstream and down-stream analyses within the context of the stream network itself. Any type of information can be addressed to the stream network in this way, making this tool highly useful for a broad range of purposes that benefit the Nation.

To use HydroAdd, users must have an existing Department of Interior (DOI) account or an Esri ArcGIS.com account. DOI or ArcGIS.com provide an open authorization (OAuth) token for login to HydroAdd. OAuth does not provide any contact information. HydroAdd requires the user to select a username for their profile. The user profile contains their username, and the email associated with their DOI or ArcGIS.com accounts. HydroAdd does not collect any other information about the user. HydroAdd does not disseminate the information in the user profile.

**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.**

HydroAdd users can be Federal employees, or members of the public, such as state, local, private sector, academic, or other users with basic knowledge of using a GIS.

Users register for HydroAdd with a user-selected username, and a DOI or Esri ArcGIS Online account. DOI or Esri provide an open authorization (OAuth) token for login to HydroAdd. OAuth does not provide any contact information. The user profile contains the user-selected username and email. HydroAdd tool does not collect any other information about the user. HydroAdd does not disseminate the information in the user profile.

HydroAdd allows users to edit the geometry of features in their own data to be coincident with NHD features. Users must share their data as a web feature service from ArcGIS.com to edit it with HydroAdd. Note that HydroAdd does not allow users to edit anything other than their own data.

This information is stored in the HydroAdd application database. A user's profile is visible only to themselves and by HydroAdd administrators. HydroAdd administrators are a limited group of USGS staff. Username and email are collected because they enable HydroAdd administrators to contact and help the user if needed, to help to protect the user's data from edit by anyone who is not the user, and to enable tracking of the editing history for the datasets through reporting.

**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.**

As the National Hydrography Requirements and Benefits Study demonstrated, users of the National Hydrography Datasets requested web-based tools to support maintenance of their

own data. The combination of improved technologies and wide public access to the internet has allowed USGS to build web-based applications such as HydroAdd that encourage citizen involvement. As mentioned in item 1, HydroAdd supports users by providing a mechanism for referencing, or *hydro addressing*, their own datasets to the NHD

**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.**

We are proposing a renewal the HydroAdd tool information collection with revisions.

Modifications to the HydroAdd tool are currently in development. These modifications include a) allowing HydroAdd to use the latest hydrography product from the USGS 3D Hydrography Program (3DHP), b) implementing an open-source hosting service for user data (GeoServer), rather than ArcGIS Online, c) authenticating users with login.gov rather than ArcGIS.com or DOI, d) updating some of the underlying logic to speed processing, and d) updating the name of the tool to HydroAdd3d.

These modifications to the HydroAdd tool do not cause information collection duplications.

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

This information does not affect small businesses or other small entities.

**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.**

Not collecting this information would prevent citizens from efficiently and effectively improving and addressing their data to the NHD with HydroAdd tool.

**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 circumstances that require us to collect information in a manner inconsistent with OMB guidelines.

**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 Oct 1, 2024, we published a 60-day Federal Register notice (89 FR 79945) announcing that we would submit this ICR to OMB for approval. In that notice we solicited public comments for 60 days. No comments were received.

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

No payments or gifts are provided to the respondents.

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

No assurance of confidentiality is given to respondents.

**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.**

The collection does not include sensitive or private questions. HydroAdd minimizes the collection of PII by limiting user information to username and a token that links the user to his/her DOI, or Esri ArcGIS Online account. As such, a PIA was not required.

**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 anticipate approximately 100 users will register for HydroAdd each year and estimate that it takes 1 minute to complete the registration form by entering a username unique to their HydroAdd profile. Users must have a preexisting DOI account or an ArcGIS.com account.

We estimate the dollar value of the annual burden hours to be \$6,137 for State or Government respondents, based on the Employer Costs for Employee Compensation-Sept 2024 (USDL-24-1863)<sup>3</sup> published by the Bureau of Labor Statistics, US Department of Labor.

**TABLE 12: Hour Burden to Users of the Information Collection**

Description of Information Collection	Number of annual Responses	Estimated Completion Time per Response (minutes)	Total Annual Burden Hours	Hourly Pay Rate (\$/hr est.)	Total Dollar Value of Annual Burden Hours*
User registration	100	1 minute to register	2	\$61.37	\$123

**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.)**

<sup>3</sup> [Employer Costs for Employee Compensation News Release - 2024 Q02 Results](#)

- \* 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, 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 estimate that the annual non-hour burden cost will be zero.

**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 used the Office of “Salary Table 2024-GS Incorporating the 4.7% General Schedule Increase Effective January 2024”<sup>4</sup> (no locality) to determine the hourly wages for federal employees. We estimate the total annual cost to the Federal Government is at least \$108,314.

**Table 14:** Estimated Dollar Value of Annual Burden Hours for Federal Employees

Federal Position	Grade/ Step	Hourly Rate	Estimated Time Spent by Federal Employees (annualized hours)	Estimated Federal Employee Salary/Benefit Annualized Costs
Project Lead	12/7	\$42.80	2,080	\$89,024

<sup>4</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2024/general-schedule>

(1.0 FTE)				
Development Team Lead (0.2 FTE)	12/10	\$46.37	416	\$19,290
Total				\$108.314

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

We are proposing to renew an information collection with revisions. We adjusted Table 12 and Table 14 to account for Federal, State, and local governments salaries in 2024.

**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.**

Data from the collection will not be published.

**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.**

Not applicable for this request.

**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.