Revised Procedures for Sensitive Data Redaction

NOAA Office of Coast Survey
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Background – Who We Are

National Oceanic and Atmospheric Administration (NOAA)

- National Marine Fisheries Service
- National Weather Service
- National Ocean Service (NOS)
- Ocean and Atmospheric Research
- National Environmental Satellite, Data and Information Service
- Office of Marine and Aviation Operations

- Center for Operational Oceanographic Products and Services
- Integrated Ocean Observing System
- National Centers for Coastal Ocean Science
- National Geodetic Survey
- Office of Coast Survey
- Office for Coastal Management
- Office of National Marine Sanctuaries
- Office of Response and Restoration
NOAA’s Office of Coast Survey is the nation’s nautical chart-maker. We update charts, survey the seafloor, respond to maritime emergencies, and search for underwater obstructions that pose a danger to navigation.

nauticalcharts.noaa.gov

All of our data products are made available to the public, outside of a compelling interest in withholding data. Digital data – containing more detailed information than the nautical charts - is published at NOAA’s National Centers for Environmental Information (NCEI).

ncei.noaa.gov
Coast Survey seeks to improve how we comply with Section 304 of the National Historic Preservation Act (NHPA) – which requires that federal agencies withhold information concerning the location, character, or ownership of a historic property if disclosure would (among other things) risk harm to the historic property.

Specifically, Coast Survey is concerned about the possible harm caused by looters or careless divers who have been alerted to a site’s presence by nautical charts or other public products produced by Coast Survey.
Coast Survey currently withholds entire surveys when a State Historic Preservation Office (SHPO) or the Bureau of Ocean Energy Management (BOEM) indicates that one or more historic sites are present. Unfortunately, this process redacts a large amount of information to protect the site(s) in question, and these redactions become more obvious over time.
Sensitive Data Redaction - Current Policy
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The revised procedures:

1) accept sites as historic if the appropriate office indicates that they are historic properties ("listed on, or eligible for listing on, the National Register of Historic Places," or likely historic properties, and

2) redacts only that information that indicates the location and nature of a specific feature.
Sensitive Data Redaction – Process for Coordination

1. Is the feature shown on existing charts?
   - YES: Chart the feature normally
   - NO: Send report and images to agency with jurisdiction

2. Did NOAA determine that the feature is a historic resource?
   - YES: Did NOAA determine that charting the historic resource would risk harm to it?
     - YES: Chart the feature or display as obstruction
     - NO: Redact sensitive data per Section 6.D
   - NO: Is the feature a hazard or danger to navigation?
     - YES: Chart the feature or display as obstruction
     - NO: Redact sensitive data per Section 6.D
Pre- and Post-Survey Consultation

Under both our current and new procedures, Coast Survey would contact your offices both before and after data acquisition. The pre-survey contact is “bundled” with a standard NHPA Section 106 consultation (for potential impacts from the survey field work itself) so that your office is aware of where we propose to work.

The post-survey notification would include a Feature Report (a series of images from the digital data) so that you can see what was actually located during the survey.
Coast Survey is traditionally known for our nautical charts – but with recent advances in technology, we’re able to produce and distribute high resolution digital data representing the seafloor. This data presents a unique redaction challenge.

Nautical charts – now largely distributed electronically – can be more simply amended with a variety of symbols, such as for wrecks, obstructions, or soundings (numbers representing water depth at a specific place).
Under our new process, Coast Survey would redact specific sensitive features using software developed at Coast Survey and the University of New Hampshire’s Joint Hydrographic Center. This targeted approach allows the public to use the majority of the dataset, rather than losing access to all of the data to protect a handful of features.

The revised process redacts the specific relevant data from the public products posted at NCEI and modifies the chart, as needed. The raw dataset would be archived at NCEI intact in a non-public location.
Sensitive Data Redaction - Process for Digital Data

1. Original Data
2. Redaction
3. Detail of Redacted Area
4. Noise Added
Sensitive Data Redaction – Nautical Charts
Federal Coordination Overview

Coast Survey has coordinated this process with our partner federal agencies, including the U.S. Navy, U.S. Coast Guard, National Park Service, Bureau of Ocean Energy Management, Maritime Administration, and the NOAA Office of National Marine Sanctuaries.

We have also coordinated with the Advisory Council on Historic Preservation.
Initiating a Section 304 consultation with NPS for each feature would not be feasible, due to the potential number of sites, and the need to update charts in a timely manner for mariner safety.

Data would be redacted following the process outlined above.

In the event that NOAA received a FOIA request to release the redacted data, Coast Survey would notify the requestor that we have begun a Section 304 consultation with NPS.
Comments?

We’re happy to discuss any questions or comments you might have.

If you want to submit comments later, you can forward your questions or comments to jay.nunenkamp@noaa.gov.

We would appreciate hearing from you within 45 days.