



# United States Department of the Interior

U.S. GEOLOGICAL SURVEY  
Reston, VA 20192



In Reply Refer To:  
Mail Stop 300  
# GS12000919

JUL 05 2012

Mr. Nathan Frey  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Dear Mr. Frey:

Under the Office of Management and Budget (OMB) guidelines at 5 CFR 1320.13, the U.S. Geological Survey (USGS) would like to request emergency processing of the enclosed information collection request (ICR) for the USA National Phenology Network (NPN).

The USA-NPN is a program sponsored by the USGS that uses standardized forms for tracking plant and animal activity as part of a project called *Nature's Notebook*. The *Nature's Notebook* forms are used to record phenology (e.g., timing of leafing or flowering of plants and reproduction or migration of animals) as part of a nationwide effort to understand and predict how plants and animals respond to environmental variation and changes in weather and climate. There are 4700 participants registered as part of *Nature's Notebook*, though only about 30% actually contribute information. These people include members of the public from many walks of life.

Contemporary data collected through *Nature's Notebook* are integrated and used to inform decision-making in a variety of contexts, including agriculture, drought monitoring, and wildfire risk assessment. Phenological information is also critical for the management of wildlife, invasive species, and agricultural pests, and for understanding and managing risks to human health and welfare, including allergies, asthma, and vector-borne diseases.

For example, changes in phenology affect human health by changing timing and patterns of allergy seasons. The NPN is collaborating with many partners on a new project to predict the timing of human allergic reactions caused by juniper pollen. Researchers intend to integrate data from citizen scientist observers of juniper phenology, satellite images of tree green-up, and data from health centers to better understand the dynamics of seasonal allergies. Better forecasting of environmental triggers can lead to more effective public health measures.

Other examples of how NPN is contributing information to improve our understanding and management of natural ecological systems, and to helping our nation effectively manage for, and adapt to, environmental changes, include:

- Contributing to the US Global Change Research Program's National Climate Assessment by (1) describing how changes in the timing of plant and animal activities affect critical sectors (e.g., agriculture, water, biodiversity) and regions of the nation and (2) developing a national index of the timing of the onset of the Spring season that can be used by resource managers, policy-makers, and the public to make decisions across sectors and regions;
- Meeting a DOI/NOAA milestone in the National Ocean Policy to organize and synthesize information and data on changes in marine and coastal system phenology to inform management of fisheries;
- Developing models to understand and predict relationships between plant phenology, spring temperatures, and water runoff to improve our ability to predict the probability of large fire events across the western US;
- Developing standardized protocols and procedures for the Inventory and Monitoring Programs of the National Park Service and National Wildlife Refuge System.

This project was initiated through a Cooperative Agreement with the University of Arizona; however, because it is a federally sponsored information collection, it was determined that the collection should comply with OMB requirements under the Paperwork Reduction Act.

According to the emergency processing procedures, the USGS has determined that:

(1) The collection of information is essential to the USGS meeting its mission requirement of collecting natural resource information and conducting systematic analyses and investigations to inform natural resource decision making, and;

(2) The USGS cannot reasonably comply with normal clearance procedures under the PRA because public harm is reasonably likely to result if normal clearance procedures are followed. Moreover, the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information. It would be a detriment to the public to cease collecting this information while OMB approval is being pursued because: (1) critical baseline information is being collected to create a continuous record of phenology on a national scale, (2) other federal organizations charged with management, inventory, and monitoring of natural resources (e.g., National Park Service, U.S. Fish & Wildlife Service) are using the program to meet their own mission obligations, and (3) the registered observers, who volunteer their time and effort to make these collections need to see a continuous and ongoing effort on the part of the government to support and maintain such a highly visible program. The use of normal clearance procedures is reasonably likely to disrupt the collection of information because it would require suspension of the *Nature's Notebook* program for at least 120 days. Such delays will negatively impact investments already made as well as the continuity of the dataset which is intended to span at least three decades.

Because this collection of information is utilized by multiple Federal entities, the USA-NPN program coordinators are in regular consultation with interested agencies and other customers in order to minimize the burden of the collection of information on the public.

We request that OMB make a decision on this emergency ICR within 10 working days of receiving it.

We request permission to waive the immediate requirements to publish a Federal Register Notice; however, if you approve this request we will immediately seek regular OMB approval by issuing a 60-day notice.

If you have any questions or need further information, please call Shari Baloch, USGS Information Collection Clearance Officer at 703-648-7174 or [smbaloch@usgs.gov](mailto:smbaloch@usgs.gov).

Sincerely,



William Lellis  
Deputy Associate Director for Ecosystems

Enclosures

NPN Supporting Statement A

NPN Supporting Statement B