

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Southwest Fisheries Science Center Sea Turtle Sightings
OMB Control No. 0648-XXXX

Abstract

Since 2015, the Marine Turtle Ecology & Assessment Program at NOAA's Southwest Fisheries Science Center (SWFSC) has been hosting a citizen science program whereby members of the public voluntarily and opportunistically submit reports on sea turtle sightings, including identification, location, and behavior. This information has been used formally in two scientific publications ([Eguchi et al. 2018](#); [Hanna et al. 2021](#)) and informally to track seasonality and distribution of sea turtle occurrence along the U.S. West Coast. Currently, public sightings data are submitted in narrative form to the SWFSC's sea turtle sightings email account. There are no specific questions asked, nor requirements for reporting. The submitted information is manually entered into an MS-Excel spreadsheet that includes more than 20 data fields; the updated summary file is then backed up to the SWFSC's database. This collection method was sufficient in the earlier years of the project when sightings reports were infrequent; however, with the recent and significant increase in submitted sightings reports (due in large part to increased outreach and education), the manual entry of this data has become cumbersome, inefficient, and more prone to transcription errors. Therefore, the primary objective of this project is to design a structured public information collection tool with fillable information fields (as opposed to a free form email solicitation) to collect basic sea turtle sightings data from the public. Requested information will include date, time, species, location, behavior, a physical description, and photos if applicable. This form will be designed such that the data are automatically uploaded to the SWFSC's sea turtle sightings database with no interim manual entry required.

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.

A public sea turtle sightings information collection tool has broad applicability and utility for management and conservation of sea turtles along the U.S. West Coast. First, the tool will significantly streamline data input into the SWFSC's sea turtle sightings database, thereby increasing efficiency and accuracy of data entry and enabling faster dissemination of sightings data to end-users (e.g., NOAA scientists, managers, non-governmental organizations, and the public). Second, a tool will have a built-in map component that is expected to substantially increase the amount and accuracy of reported geographic locations (*i.e.*, latitude and longitude) of sea turtle sightings by the public. Currently, most sea turtle sightings reports do not include this precise location data because public members typically do not have the means to record latitude and longitude at the time of the sighting. A built-in mapping component will enable the public member filling out the survey to provide the latitude/longitude location of the sea turtle because they will be prompted to estimate its location using the mapping tool. Last, biologists with NMFS' WCR Protected Resources Division (PRD) and the SWFSC comprise a team to consider designating critical habitat under the ESA for six distinct population segments of the green sea turtle (*Chelonia mydas*) that inhabit U.S. waters, including the East Pacific green turtle that forages along the U.S. West Coast. This action is being taken in part pursuant to a Court Order, which

mandates NMFS to consider proposing critical habitat for these six distinct population segments by June 2023. NMFS' WCR PRD has expressed the need to use the SWFSC's public sightings data to inform their critical habitat analysis.

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.

This information will be requested from members of the public. Requested information will include the respondent's name, email address, date of the sighting, time of the sighting, species, location, size, a physical description, and behavior. The only required information fields will be the date, email address, and location; all other fields will be optional. The email address is primarily recorded so that a member of the SWFSC Marine Turtle Ecology & Assessment team can thank the public member for their sightings report, however the email address is also useful in case the team member would like to respond with follow up questions. This information will be used to monitor sea turtle distribution and occurrence along the U.S. West Coast. The information will also be used to inform critical habitat analyses as mandated under the Endangered Species Act.

At the outset of this project, the respondent will have three options for submitting their sightings reports: 1) the SWFSC's new online sea turtle sightings collection tool; 2) the standard SWFSC sea turtle sightings email account (swfsc.turtle-sightings@noaa.gov); and 3) a sightings form created by a third party non-profit organization called SoCal Sea Turtles, Inc., which designed their form to be directly forwarded to the SWFSC's sea turtle sightings email account. Once the new website collections tool is operational, we will investigate the option to create a project within the iNaturalist mobile application that would collect the same sightings information. The purpose of this project component would be to target public members that prefer to use mobile applications as opposed to desktop applications.

The information will be collected on an opportunistic basis. In 2021, public members submitted 114 sightings reports to the SWFSC's sea turtle sightings email account.

The information will be summarized and disseminated to the public via the SWFSC's website. The published information will include maps for each species, and listing of summary statistics and unique insights about sea turtle biology that emerge from the information provided by the public.

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.

The information collection involves the use of electronic collection techniques. Public members will be able to opportunistically submit sea turtle sightings information via a fillable survey form on the SWFSC's website. Once submitted, this information will be automatically backed up to the SWFSC's database.

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 Aquarium of the Pacific (AOP), a 501(c) nonprofit organization in Long Beach, California, manages a citizen science volunteer program whereby members of the public record sea turtle sightings data (e.g., time, location, and size) at select locations along the San Gabriel River (border of Los

Angeles and Orange County, CA) once a month during 30-minute monitoring sessions. As part of this program, the AOP encourages volunteers and other members of the public to submit information about San Gabriel River sea turtles sighted outside of the formal monitoring sessions to the AOP's sponsored project on the iNaturalist mobile application called the *Southern California Sea Turtle Monitoring Project*. In contrast to the AOP's mobile application, our collection tool will solicit coast-wide sea turtle sightings information on the SWFSC's website (as opposed to only Southern California). We requested feedback from the AOP on our proposed collection tool, and the AOP has indicated they would retire their iNaturalist project and instead direct their volunteers to NOAA's sea turtle sightings collection tool once it is ready for use.

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

This information collection will not have any impacts on 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.

If this collection is not conducted, the utility of the sea turtle sightings data will continue to be limited and NOAA would not be able to meet the court order which mandates NMFS to consider proposing critical habitat for six distinct population segments by June 2023. NMFS' WCR PRD has expressed the need to use the SWFSC's public sightings data to inform their critical habitat analysis. The influx of sightings emails in the last two years has drastically increased, in large part due to increased education and outreach. This has caused data entry to lag (in part due to staff shortage) and thus, not be used in a timely manner. In addition, sightings data is most valuable when it includes a latitude and longitude coordinate for mapping purposes, which a large majority of sightings reports do not have. Without this new collection tool, sightings reports will likely continue to lack this information, which is what is most crucial for critical habitat analysis.

7. 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 that would cause this information collection to be conducted in a manner inconsistent with OMB guidelines.

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.

The Federal Register Notice for this information collection request published on December 6, 2021 (86 FR 69016) with a 60-day public comment period ending on February 4, 2022. No comments were received.

The SWFSC consulted with both the Aquarium of the Pacific and NOAA's National Marine Sanctuary program, who both indicated that this information would be useful to collect and applicable to their conservation work.

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

No payments or gifts will be provided.

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.

The personally identifiable information (PII) collected through this project (*i.e.*, name and email address) does not constitute sensitive PII under NOAA policies. All sightings data will be protected and stored on a government computer at a federal facility, and will only be accessed by approved personnel who are authorized to access the information. Select sightings information will be distributed to relevant end-users of the data (see response to #15 below), but personal information of respondents would not be included any distributed data. System of records notice [NOAA-11](#), *Contact Information for Members of the Public Requesting or Providing Information Related to NOAA’s Mission*, authorizes the collection of the PII for this collection.

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 request does not include any questions of a sensitive nature.

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

Since the majority of respondents live in California, we used the average hourly wage rate for “All Occupations” in the state of California from the BLS Occupational Outlook Handbook below (May 2020).

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
Sea Turtle Sightings Survey	Public (could be any occupation)	132 sightings reports per year	1	132	5 minutes	11 hours	\$22.74	\$250
Totals								

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 are no capital costs or operating and maintenance costs associated with this information collection.

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.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4	103,690	2.3%		\$2,444
Other Federal Positions					
Contractor Cost					
Travel					
Other Costs:					
TOTAL					\$ 2,444

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

This is a new information collection request.

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.

This project is part of a long-term monitoring program for sea turtle populations along the U.S. west coast, therefore the SWFSC plans to collect sea turtle sightings data on a continuing basis and use the information on an as-needed basis, with no pre-determined end date. Data will be distributed internally (*e.g.*, to WCR Protected Resources Division) and externally (*e.g.*, to relevant partners such as the Aquarium of the Pacific) upon request. The sightings species and location data will be used to publish annual maps of sea turtle sightings.

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 [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).