

# 1 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## Turtle Distribution Database OMB Control Number 1028-NEW

**Terms of Clearance:** Not Applicable - New Collection.

### Justification

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

Turtles are one of the most threatened taxa on Earth however information on many populations (i.e., demographic information) are lacking due to difficulties observing these wide-ranging and often cryptic species. Turtles do however, often live in habitats that are frequented by or in proximity to humans, and they also undertake regular migratory movements that may bring them in contact with humans. As such, turtles are opportunistically observed by humans during their everyday activities, such as while walking through a park, driving along a roadway or kayaking in a river or pond. Local citizen-science projects focused on single species (such as box turtles) have provided valuable demographic information for turtle populations however these projects are isolated both spatially and specifically (i.e., focused on one species). This project would use sighting information supplied by citizens to fill gaps in our knowledge of turtle populations throughout the southeastern United States. The USFWS requires such information to document species' status and inform conservation decisions, including whether to list or de-list species.

The authority for this collection is 43 U.S.C. 31 et seq. The Organic Act of March 3, 1879.

**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.**

The likely respondents to this will be individual citizens. When a citizen observes a turtle, they would document the species (if possible), location (latitude/longitude collected via cell phone), date, and time, and photograph the animal. We would also ask each contributor to provide their initials (not full name) and a way to contact them if questions about the entry arise (e.g., phone number or email address). The sighting information would be mapped in ArcGIS and used to develop species distribution maps and run demographic models. We intend to use paper forms and the Survey123 platform (<https://survey123.arcgis.com/>) from ESRI as data entry devices although we expect the vast majority of contributors to use the Survey123 platform. Survey123 is available as an app on cell phones and can also be used via laptop. Contributors do not have to complete all entries on the form; we will accept partial entries and as much information as they are able to provide. The information will be collected opportunistically whenever the citizens observe a turtle and feel like answering the questions. Summarized versions of the processed data will be provided to USFWS, and published in peer-reviewed scientific journals. Additionally, citizens involved in the project can choose to view a summary of the turtle sightings on the Survey123 app. That information will not be made available to the public, only to people who contribute information. The raw data and exact entries provided by citizens (including citizen initials and contact information) will not be provided to anyone.

<b>For our survey, we ask</b>	<b>So we can</b>
Date	Document when during the year a turtle was present
Time	Document when during the day a turtle was present
Location (latitude/longitude)	Document where the turtle was observed both on a broad scale (e.g., county, state, etc.) and fine-scale (habitat type)
Turtle species (if known)	Document what types are species are observed at certain times and in certain locations
Photographs	To double check species identifications, identify sex (e.g., males have longer tails than females) and to document injuries or physical abnormalities

**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.**

Our survey will be available electronically on the Survey123 platform (see example screenshots from Survey123 below) and we expect > 95% of respondents will utilize this electronic format as opposed to a paper form submission. Citizens can download the Survey123 app on their cell phone or use it on a computer. We will make the paper form available on the project webpage for public printing. Additionally, citizens involved in the project can choose to view a summary of the reported turtle sightings on the Survey123 app.



Figure 1. Example screenshots from Survey123 showing how information can be entered by citizens.

**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.**

There is no duplication. We are unaware of any agency gathering the same or similar information. Additionally, this information is specific to this region and to the species that inhabit this region and as such not available.

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

This information collection does not impact 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 we do not collect this information, the USFWS (and other management agencies) will not have data necessary to effectively conserve and manage turtle species in this region. The lack of data impacts decisions such as whether to list or de-list a species. As human populations expand and the climate changes, real-time data on turtle distributions and demographics are needed to prevent population declines.

**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 the 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 February 21, 2023, we published a 60-Day *Federal Register* notice (88 FR 10536). We did not receive any comments in response to that notice.

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

We will not provide payments or gifts to respondents.

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

We do not provide any assurance of confidentiality. Information is collected and protected in accordance with the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (5 U.S.C. 552). We will maintain the information in a secure System of Records (DOI LEARN (Department-wide Learning Management System) - Interior, DOI-16, 70 FR 58230)."

**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.**

We do not ask questions of a sensitive nature.

**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 estimate there will be 50 respondents and 250 responses annually. The survey is estimated to take < 5 minutes to complete therefore we estimate 1,250 minutes (21 hours) of annual burden time.

We estimated the total dollar value of the annual burden hours for this collection to be \$879 (rounded). We used the Bureau of Labor Statistics news release [USDL-20-0451](#) March 7, 2023, Employer Costs for Employee Compensation – December 15, 2022 to calculate the total annual burden. This document provides an hourly cost for individuals as \$41.86:

Respondent	Activity	Annual No. Respondents	Number of Submissions Each	Total Annual Responses	Total Annual Burden Hours	Hourly Labor Costs incl.. Benefits	Dollar Value of Annual Burden Hours

Individuals	Reporting	50	5	250	21	\$41.86	\$879
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**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.)**

- \* 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 have not identified any non-hour cost burden associated with this 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.**

**Include here a description of the method used to estimate costs to the Federal Government, which should show the quantification of hours, operational expenses (such as equipment, overhead, printing, and staff support), and any other expense that would not have been incurred without this collection of information. If there will be no costs beyond the normal labor costs for staff, state that here.**

The total estimated cost for this Information Collection Request to the Federal Government is \$702/year for federal salaries. We used Office of Personnel Management Salary Table 2023-GS to determine the annual wages and multiplied the hourly wage by 1.57 to account for benefits in accordance with BLS news release [USDL-16-2255](#). All work is done from the Wetland and Aquatic Research Center in Gainesville, Florida so the general salary table was used. There will

be no operating costs.

**Table 1 – Salaries and Benefits: \$702** (average grades/steps with 100% of time dedicated to program)

Activity	Grade/ Step	Hourly Rate	Hourly Rate w/ Benefits (x 1.57)	Total Responses	Time per Response (hours)	Total Annual Hours	Annual Cost
Biologist	GS-09/5	\$ 26.62	\$ 41.79	250	0.05	12.5	522
Research Biologist	GS-13/05	\$ 45.91	\$ 72.1	250	0.01	2.5	180
<b>Total</b>							<b>\$702</b>

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

This is a new collection.

**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.**

We expect to summarize and analyze data collected from this survey and publish select aspects of the data. Analytic techniques include mark-recapture modeling (e.g., Cormack-Jolly-Seber), and species distribution models which generate a continuous probability distribution of species occurrence from presence-only datasets and a suite of environmental predictor variables. Spatial data layers will be maintained and processed using ArcGIS (ESRI, Redlands CA), and all statistical analyses will be conducted in R (R Core Team, 2018).

Summarization and analysis of data would not begin until year 3 of the project (at the earliest) and expected publication would occur in year 4 or 5 (at the earliest). We hope to begin data collection on June 1, 2023 and continue this project for at least 10 years, as demographic studies of relatively long-lived species (such as turtles) require extended datasets. The results of the collection will be made available on our USGS Center’s webpage and the project PI’s USGS profile page.

**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.**

We will display the OMB Control Number and expiration date on appropriate materials.

**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.