October 25, 2022

Via Email (NOAA.PRA@noaa.gov)

Adrienne Thomas
NOAA PRA Officer
National Oceanic and Atmospheric Administration
Office of Science and Technology
1315 East West Highway, Building SSMC3
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Dear Ms. Thomas,

Friends of Animals[1] submits these comments regarding the August 26, 2022, post in the Federal Register, "Generic Clearance for NOAA Citizen Science and Crowdsourcing Projects (New)."[2]

In this post, NOAA has requested to allow approval for a "generic clearance" for NOAA's citizen science and crowdsourcing projects. In addition to increased compliance with the Citizen Science and Crowdsourcing Act[3] and the Paper Reduction Act,[4] NOAA states that this clearance will assist NOAA in obtaining scientific information that supports its mission.[5]

In general, Friends of Animals believes that the use of citizen science can be a helpful tool for NOAA to acquire scientific information. Collecting information via crowdsourcing like this can be done in ways that enhance NOAA's mission. However, efforts should be made to ensure that the information collected is reliable, accurate, and free of biases.

A. The Necessity of the Information Collection

There are many helpful ways in which this information collection contributes to the furthering of NOAA's mission. Such volunteer participation in the scientific process could

[1] Friends of Animals is a non-profit international advocacy organization incorporated in the state of New York since 1957. Friends of Animals has nearly 200,000 members worldwide. Friends of Animals and its members seek to free animals from cruelty and exploitation around the world, and to promote a respectful view of non-human animals, both free-living and domestic.
[2] National Oceanic and Atmospheric Administration, Comment Request; Generic Clearance for NOAA Citizen Science and Crowdsourcing Projects (New), 87 Fed. Reg. 52511 (Aug. 26, 2022).
[3] 15 U.S.C. § 3724.
[4] 44 U.S.C. § 3501 et seq.
[5] *Id.*

have several contributions that are authorized by statute, including refining project design, collecting data, making discoveries, or even solving problems.[6]

While crowdsourcing can make important contributions in these areas, it is still vital that the information collected be held to a high scientific standard. Information that is biased, inaccurate, or unreliable will not further NOAA's mission. Relying on such information has great potential to cause harm. To that extent, Friends of Animals has the following suggestions to ensure that the information collected remains a positive impact on NOAA's mission.

B. <u>Ways to enhance the quality, utility, and clarity of the information to be collected</u>

1. <u>NOAA should ensure that people who participate in citizen science are qualified to do so.</u>

Even though crowdsourced information may be helpful, information of low quality or low clarity may actually hinder NOAA's mission. This is because, when crowdsourcing, information may be contributed by people who lack the scientific standards that NOAA abides by. For example, people submitting information regarding ESA-listed species may not be able to distinguish between endangered, threatened, and common subspecies. This could have the effect of suggesting that one of the marine and/or anadromous ESA-listed species that NOAA is responsible for has a higher population number than it actually does.

During the height of the COVID-19 pandemic, many people sought outdoor activities to avoid close contact. For example, 750,000 people used the Audubon Bird App in spring 2019, but reached more than 1,200,000 in 2020 and 2021.[7] While some people participating in birding—and other activities upon which NOAA may rely on for crowdsourcing science—may have been involved in these activities for a longer time, others may be new.

NOAA should take steps to ensure that data is not gleaned from people who are entirely new to these fields. This applies whether the citizen science at issue involves watching whales, tracking tides, collecting water quality samples, or monitoring marine debris.

2. <u>When NOAA decides to use citizen science data, NOAA should use a consistent mix of both citizen and non-citizen science data collection.</u>

It may be troublesome for NOAA to rely on scientists one year or project, and then rely on crowdsourcing that information the next year or project. This could stem from the fact that

[6] 15 U.S.C. § 3724(c)(1).
[7] Quartz, *New data show that birding mania isn't just a lockdown fad*, https://qz.com/2024279/birdings-popularity-is-lasting-beyond-the-pandemic (June 25, 2021).

professional scientists may have different standards of precision and verification than citizen scientists. For example, what one professional scientist may consider to be debris may differ from what a citizen science may consider to be debris. In another area where NOAA crowdsources science, collecting water quality data, the process of gathering water may vary greatly depending on the experience of the person collecting the water. Furthermore, differing levels of precision tools and measuring devices are likely available to professional scientists and

Thus, data collected by professional scientists should not be directly compared to data collected by citizen scientists. The data collected should indicate the source, so that the two sets of data may be compared to other data of the same type.

Conclusion

Friends of Animals believes the use of citizen science can help further NOAA's mission to understand and predict changes in climate, weather, oceans, and coasts, in addition to its responsibilities under the Endangered Species Act. The use of citizen science can add important information to NOAA's analysis of these issues in addition to saving resources by crowdsourcing these efforts. Friends of Animals suggests that NOAA uses such crowdsourcing efforts in a responsible and scientific manner to ensure that citizen science only contributes accurate, reliable, and consistent information. Only through these qualities will the use of citizens be effective and actually contribute to NOAA's mission.

Sincerely,

Adam Kreger

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