



MARINE MAMMAL COMMISSION

12 August 2020

Mr. David Holst, Chief Financial Officer
Office of Oceanic and Atmospheric Research
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910-3225

Dear Mr. Holst:

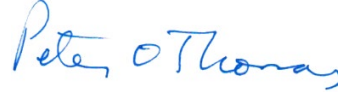
The Marine Mammal Commission (the Commission) has reviewed the National Oceanic and Atmospheric Administration's (NOAA) request for comments (85 Fed. Reg. 47750) on its Citizen Science draft strategy at the staff level. The draft strategy was developed to enable NOAA to leverage public participation in support of agency mission areas and to complement the other NOAA "Science and Technology Focal Areas", including Artificial Intelligence, Cloud Computing, Data, 'Omics, and Unmanned Systems, for which NOAA released draft strategies in November 2019. Following the finalization of the Citizen Science strategy, NOAA intends to develop a complementary "Strategic Implementation Plan" that defines detailed action items, deadlines, and responsibilities.

The Commission fully supports NOAA's objective to engage the public in carrying out the mission of the agency while maintaining the high standards of the agency's products and services. The Commission also appreciates that the Citizen Science draft strategy emphasizes the coordination and support of citizen science efforts across NOAA offices and recognizes that the strategy provides a general framework intended to guide the development of a future implementation plan.

As the implementation plan is drafted, the Commission hopes that NOAA will consider and incorporate citizen science projects related to marine mammals. For decades, members of the public have helped professional scientists collect data on marine mammals in a variety of ways, from conducting shore-based counts (e.g., SeaWatch), to taking photos (e.g., Baird et al. 2008, 2009), to carrying out stranding surveys to document mortality events (e.g., Mignucci-Giannoni et al. 1999). With proper implementation, including the appropriate training of volunteers, design of experiments, and analyses of data, marine mammal citizen science projects can help offset the inherent cost and difficulty of studying marine mammals and increase the spatial and temporal coverage of datasets and provide data to inform marine mammal policy and management decisions. For example, mobile phone applications such as Whale Alert allow citizen scientists to report real-time whale sightings, thus helping to reduce the likelihood of ship strikes and helping managers respond to injured or distressed animals. As such, the Commission highly encourages NOAA to coordinate with the National Marine Fisheries Service to ensure that the implementation plan for the Citizen Science strategy appropriately integrates citizen science efforts related to marine mammals.

Please contact me if you have any questions regarding this issue.

Sincerely,



Peter O. Thomas, Ph.D.,
Executive Director

References

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- Baird, R.W., A.M. Gorgone, D.J. McSweeney, D.L. Webster, D.R. Salden, M.H. Deakos, A.D. Ligon, G.S. Schorr, J. Barlow, and S.D. Mahaffy. 2008. False killer whales (*Pseudorca crassidens*) around the Main Hawaiian Islands: Long-term site fidelity, inter-island movements, and association patterns. *Marine Mammal Science* 24: 591–612.
- Mignucci-Giannoni, A., B. Pinto-Rodríguez, R.A. Montoya-Ospina, N.M. Jiménez-Marrero, M. Rodríguez-Lopez, E. Williams Jr., and D. Odell. 1999. Cetacean strandings in Puerto Rico and the Virgin Islands. *Journal of Cetacean Research and Management* 1: 191–198.