

Citizen science as a valuable tool for environmental review

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1 **Abstract**

2 Human development and population growth are placing immense pressure on natural
3 ecosystems, necessitating a balance between development and biodiversity preservation. Citizen
4 science may serve as a valuable resource for monitoring biodiversity and informing decision-
5 making processes, but its use has not been investigated within the realm of environmental
6 review. We sought to quantify the extent to which citizen science data are currently being used,
7 mentioned, or suggested in environmental impact statements (EISs) by analyzing a corpus of
8 EISs (> 1,000) produced under the United States National Environmental Policy Act (NEPA),
9 housed at NEPAAccess.org. We found increasing incorporation of citizen science within the
10 environmental review process, with 40% of EISs mentioning, using, or suggesting use of such
11 information in 2022. Citizen science offers substantial potential to enhance biodiversity
12 monitoring and conservation efforts within environmental review, but there are many
13 considerations that need to be broadly discussed before widespread adoption.

14

15 *Keywords:* environmental management; citizen science; biodiversity; participatory science;
16 environmental consulting; environmental impact statements; environmental review

17 **Introduction**

18 Human pressures on nature are pervasive (Bowler *et al.* 2020), with a growing human population
19 inevitably leading to increased building and development projects (e.g., infrastructure, urban
20 expansion, resource extraction). Maintaining biodiversity, and the associated benefits for
21 humanity (Pimentel *et al.* 1997), should be a critical goal as future development projects are
22 planned. And governments, developers, and society in general need tools that help reconcile
23 future development and mitigate biodiversity loss (Simmonds *et al.* 2020).

24
25 Currently, many local, state, and federal governments around the world have laws and policies in
26 place to help mitigate biodiversity loss from development projects. A key part of this policy
27 process typically involves an environmental review of the potential socio-environmental impacts
28 of a particular project, and the identification of strategies to mitigate impacts, such as minimizing
29 biodiversity loss. Although such laws and policies tend to focus on threatened and endangered
30 species, mandates exist for agencies to consider how actions will affect biodiversity as a whole
31 (CEQ 1993). In the United States, for example, the National Environmental Policy Act (NEPA)
32 mandates environmental reviews for any federal project with the potential for significant impact
33 on the environment. Since it was enacted in 1970, NEPA has been emulated by more than 194
34 states, provinces, and countries around the world. In the US and many countries, environmental
35 reviews are overseen by federal and state agencies, and much of the work of data collection and
36 analysis involves professional consulting firms. This professional field, hereafter referred to as
37 ‘environmental consulting’, plays a critical role in the goal of reducing impacts to biodiversity.

38

39 One of the first steps in developing an environmental impact assessment is to document and
40 quantify the organisms present on the planned site of development. In an ideal world, given the
41 potential for significant environmental impacts, each project would begin with thorough
42 biodiversity surveys to ensure species are properly censused. However, such surveys can be
43 expensive and time consuming, leading agency officials and environmental consultants to
44 sometimes rely on existing sources of information about the presence of species.

45
46 Citizen science, or community or participatory science, now accounts for the majority of
47 biodiversity data being collected globally (Callaghan *et al.* 2023). As such, citizen science is
48 frequently touted as a potential mechanism for biodiversity monitoring (Tulloch *et al.* 2013;
49 Chandler *et al.* 2017; McKinley *et al.* 2017), especially given the cost-effectiveness combined
50 with broad spatial, temporal, and taxonomic scope of the data. But these calls most often revolve
51 around government and ‘public’ entities, for example, monitoring progress towards Sustainable
52 Development Goals (Fraisl *et al.* 2020), or the ability to use citizen science in governmental
53 monitoring schemes (Hadj-Hammou *et al.* 2017).

54
55 In contrast, the role of citizen science in environmental reviews in general, and in the private
56 sector in particular has been neglected. Anecdotally, we know that environmental consultants
57 may use some citizen science data to inform their work. But a more comprehensive
58 understanding of how citizen science data are being used in environmental reviews is critical,
59 given the implications for policy-relevant decision making. As an example, citizen science data
60 come with many types of spatial and temporal biases often influencing our understanding of
61 biodiversity (Bowler *et al.* 2022). Are these biases properly accounted for as part of the

62 environmental review? Are citizen science data being used to provide documentation of
63 endangered and/or threatened species at a site? And how often are these data being used to
64 inform environmental review?
65

66 Here, we seek to answer these questions by highlighting a currently overlooked, but promising
67 source of data—biodiversity data originating from citizen science (or participatory science)
68 projects—that agency officials and environmental consultants may use to complement
69 environmental review processes. First, we provide an overview on the potential value of citizen
70 science for environmental reviews. Second, to quantify the extent to which citizen science data
71 are currently being used or mentioned in environmental review, we analyzed a corpus of
72 Environmental Impact Statements (EISs) produced under the US National Environmental Policy
73 Act (NEPA) that is housed at NEPAAccess.org (the largest and most comprehensive repository of
74 US federal environmental impact statements). Third, we discuss some of the potential
75 disadvantages of the widespread use of citizen science data in environmental reviews and by
76 environmental consulting firms. And we conclude with some future avenues to broaden the
77 potential of citizen science data in environmental reviews including some recommendations
78 relevant for decision-makers and agency officials who oversee environmental review processes.
79

80 **The potential value of citizen science for environmental review**

81 There is much potential for expanded use of citizen science in environmental review. The use of
82 citizen science in environmental review could include agencies and consultants interacting with
83 volunteers directly or the use by agencies and environmental consultants of data originating from
84 citizen science projects (i.e., indirectly working with volunteers). An obvious benefit of using
85 citizen science data is the potential for increased data collection over many years and with broad

86 geographic extent. In many areas, citizen science participants are dedicated and exceptional
87 naturalists with an ability and dedication to detect even the rarest species—arguably the species
88 that can be most important for EISs.

89

90 Increasing public engagement in the environmental review process could have many flow-on
91 effects, including more educated voters that support legislation for biodiversity-friendly
92 development practices, as well as a more generally aware public about environmental decision-
93 making processes and policies. In fact, the need for public engagement is recognized in the
94 NEPA statute. By regulation, public participation is required at two points during the
95 environmental review process: public input is requested during the early “scoping” stage of
96 projects, and the public is asked to officially comment on draft EISs. The Council on
97 Environmental Quality (CEQ) is currently proposing to enhance public participation by
98 improving access to environmental review documents, making them electronically available on
99 project or agency websites (CEQ 2023).

100

101 **Quantifying the current use of citizen science data in environmental impact statements**

102 To gain an understanding of the current use of citizen science data in environmental consulting
103 we searched EISs for the following keywords: “citizen science”; “community science”; “eBird”;
104 “iNaturalist”. We constrained our search to eBird and iNaturalist as these are the most popular
105 and widely used citizen science projects throughout the continental United States, matching the
106 extent of our analysis.

107

108 We used NEPAccess.org, a platform for finding and analyzing decades of applied science and
109 records of public participation in United States environmental decision-making processes, to find
110 EISs completed between 2012–2022. Our search was conducted in February 2023. This platform
111 covers the period from 1970 to the present, and includes full-text searchable PDFs of EISs, EPA
112 metadata records since 2012, and additional metadata developed by the NEPAccess team.

113

114 To investigate how citizen science data was used in each document, we coded the mention and
115 use of citizen science data as either direct use, indirect use, nondescript/inconclusive, or
116 encouraged/suggested use (see Supplementary Text 1 for formal definitions). Direct use was
117 coded for an EIS when citizen science played a pivotal role in directly influencing a decision
118 within the analysis. This often involved using citizen science data to identify and document the
119 presence or absence of species near the project area. Indirect use was coded when citizen science
120 was utilized as a supplementary resource for the analysis, providing background or reference
121 data without directly influencing a decision within the assessment. Nondescript/inconclusive was
122 coded when we could not determine the reason citizen science was being used or it was
123 mentioned in passing. Encouraged/suggested use was coded when citizen science data was not
124 used in analysis but was being suggested to fill a knowledge gap or as a part of the project’s
125 objectives. In addition, we noted the lead agency of the EIS (e.g., the United States Fish and
126 Wildlife Service or the Bureau of Land Management). We searched 1,355 EISs in the
127 NEPAccess repository, and from these, 253 documents included references to our keyword
128 searches, of which 25 were false positives and removed from analysis.

129

130 Since 2012, 17% of EISs mentioned or used citizen science data. When examined overtime, we
131 found an increasing proportion of EISs mentioning or using citizen science data, with the highest
132 proportion (40%) occurring in 2022 (Figure 1). And EISs using citizen science data were present
133 across 45 agencies, with the most common being U.S. Army Corps of Engineers (n=38), U.S.
134 Forest Service (n=26), and Bureau of Land Management (n=24) (WebFigure 1). A total of 147
135 EISs (64% of all EISs that mentioned citizen science) had direct use of citizen science data, with
136 the most popular being eBird (87% of direct use cases) and only 6% using iNaturalist data (Table
137 1). For example, these were used to document the number of individuals and number of records
138 for species of interest in the focal geographic area (see Box 1). We also found that 43 EISs (19%
139 of all EISs that mention citizen science) had indirect use of citizen science data; for example,
140 using iNaturalist species range to make a statement about animal biology. Importantly, we found
141 that of the direct use cases, 28 EISs (12% of all EISs that mention citizen science) used no
142 sighting of a species as evidence of absence of that species (see Box 1). Another 46 EISs (20%
143 of all EISs that mention citizen science) suggested or encouraged future use of citizen science;
144 for example, by aiming to increase local volunteerism and enhancing local interest in the natural
145 resources (Box 1).

146

147 Our results highlight a previously undocumented use of citizen science data, relevant for
148 environmental reviews and the field of environmental consulting. Our analysis points to the
149 current, and increasing, use of citizen science since 2012, mimicking the popularity of citizen
150 science in the broader biodiversity research field (Pocock *et al.* 2017). At the same time, our
151 results also illustrate the future potential of citizen science data in environmental review, with an
152 increasing number of EISs suggesting and encouraging future use of citizen science

153 participation. Yet, how citizen science is further implemented in environmental consulting is
154 worthy of further discussion. Appropriate use of citizen science data, statistically accounting for
155 the potential biases in the data is critical to make scientifically sound EISs. For example, data
156 from iNaturalist are buffered for threatened species, where the precise coordinates are not
157 known, but it wasn't always clear if, or how, this was taken into consideration. Nevertheless, the
158 number of EISs using or mentioning citizen science in some way warrants further consideration
159 of the future of how environmental reviews, and the policies that influence how reviews are
160 conducted, should be implemented.

161

162 **Further considerations of using citizen science data in environmental consulting**

163 While there is much potential of using citizen science data to further advance and increase the
164 power of decision making using EISs, there are further considerations worth discussing. First, to
165 what extent participants of citizen science projects are willing for the data they collect to be used
166 in a professional environmental consulting firm should be considered. A major motivation of
167 citizen science participants is to contribute to conservation (Maund *et al.* 2020), and
168 conservation-minded people may be opposed to development (McBeth and Shanahan 2004).
169 Therefore, it might be difficult to get direct buy-in from potential citizen science participants to
170 be willing to help contribute data to the environmental review process. In addition,
171 environmental consulting is a for-profit business which then raises the question of whether
172 participants would be willing to contribute data that a for-profit company uses.

173

174 Second, the use of citizen science data requires a nuanced understanding of the data and
175 appropriate statistical analysis and thus conclusions about biodiversity. Of the EISs that directly

176 used citizen science data, 12% used citizen science data as evidence of species absence.
177 However, there are many biases and gaps in organisms' presence associated with citizen science
178 data. It is unlikely that project areas, and nearby adjacent areas, will necessarily have data from
179 citizen science to provide sufficient evidence an organism was not there. Given the detectability
180 and bias issues associated with citizen science data (Bird *et al.* 2014), we caution against
181 concluding that an organism is not there based solely on an absence of records.

182

183 **Future avenues for broadening the use of citizen science in environmental review**

184 As illustrated, there are both potential benefits and drawbacks to the future use of citizen science
185 data in environmental consulting. As such, we outline some potential research avenues that could
186 help better understand and thus position the role of citizen science in the future of environmental
187 review.

188

189 - **Broadening the scope of EISs included in analyses.** A further refinement of our
190 understanding of how citizen science is used in EISs is necessary. We only focused on
191 environmental reviews at the federal level under NEPA, but did not include state-level
192 and county-level analyses, another area worthy of exploration in the future. Because our
193 analyses focused on EISs at the federal level, we did not account for many environmental
194 consulting projects that take place on private land, where citizen science data may be less
195 likely available.

196 - **Encourage data sharing reciprocity whenever possible.** Whenever possible, we
197 recommend reciprocity of data sharing, where environmental consulting firms share their
198 data with citizen science repositories. For example, bird surveys commissioned by

199 environmental consulting firms could be submitted to eBird and information about other
200 organisms could be submitted to iNaturalist. Sharing data with the community of
201 scientists and the public could help ensure people are willing to help share data back and
202 enhance reciprocity. However, we recognize the legal issues of who owns the ‘data’ by
203 environmental consulting firms are often unclear and potentially problematic to data
204 sharing.

205 - **Optimize sampling effort by citizen scientists.** Many citizen science participants are
206 eager to help conservation efforts and protect biodiversity (Maund *et al.* 2020). One
207 promising avenue of future research includes optimizing how and where citizen science
208 participants collect data (Callaghan *et al.* 2019; 2021; 2023). If potential development
209 plans are known, then citizen science participants could be mobilized to collect data from
210 the locations in which observations would be most valuable, for example to better
211 document the species of concern at a potential development site.

212 - **Produce policy-relevant guidelines on how citizen science should be used in EISs.**
213 Here, we do not provide guidelines on how citizen science data could be used in
214 environmental reviews, but the production of potential guidelines that include guidance
215 on statistical analysis is an important avenue before citizen science data are commonly
216 used in environmental review. For U.S. federal environmental reviews under NEPA, the
217 guidelines would need to be produced by the Council on Environmental Quality, the
218 agency within the Executive Office of the President that oversees NEPA implementation.

219

220 **Conclusions**

221 As the global population continues to increase and simultaneously urbanize, development and
222 the policies surrounding development are increasingly important. Quantifying how and what
223 biodiversity is present is essential to effective biodiversity loss mitigation. Citizen science is an
224 increasingly valuable data source for biodiversity researchers and scientists. And environmental
225 review is a critically important, but often overlooked, component of biodiversity monitoring and
226 conservation. Our purpose here was to raise awareness of the potential advantages and
227 disadvantages of the use of citizen science in EISs, using those previously submitted in the U.S.
228 under the National Environmental Policy Act as a case study. It is our hope that our findings will
229 spur further discussion about the relevance and value of citizen science data in the environmental
230 review process. We believe that biodiversity monitoring, and biodiversity conservation more
231 broadly, will benefit from increased use and participation of citizen science within the domains
232 of environmental review and environmental consulting.

233

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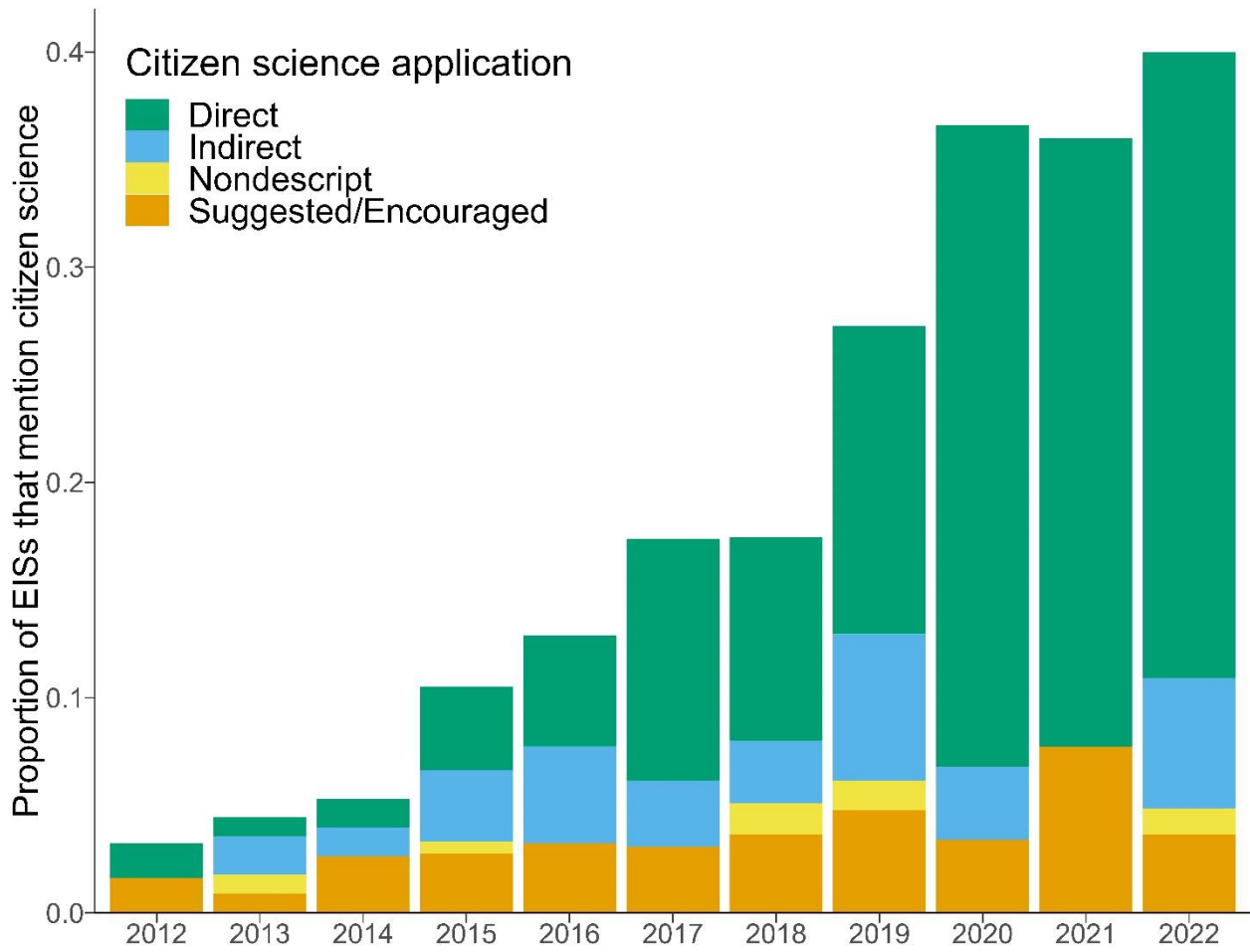
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Figure 1. Proportion of Environmental Impact Statements (EIS) returned from our search about citizen science between 2012 and 2022, categorized by use type.



Box 1. Quotes from Environmental Impact Statement publications mentioning citizen science data or platforms by use type. The references for these EISs can be found in Supplementary Text 2.

Direct Use

“In eBird, there are 687 records of 969 [olive-sided flycatcher] individuals on the Inyo National Forest” (Forest Service 2019).

“An eBird query, which documents the presence or absence of species using a real-time, online checklist, showed no reported sightings of [yellow-billed cuckoo] in Kittitas County (eBird 2012)” (Bonneville Power Administration 2017).

“No records of [Arkansas river shiner] have been submitted to iNaturalist (2021) from within or close to the landscape analysis area” (Rural Utilities Service 2022).

Indirect Use

“[Rufa red knot] is generally restricted to ocean coasts during winter and occurs primarily along the coast during migration . . . (eBird 2019)” (DOS 2019).

Nondescript

“Programs are offered across Mount Desert Island and on the Schoodic Peninsula. Programs focus on historical/cultural resources (e.g., Carrol Homestead Tours) and natural resources (e.g., iNaturalist Walk)” (National Park Service 2019).

Suggested/Encouraged Use

“National Park Service would engage communities in neighborhood partnership programs and citizen science activities with the goals of increasing volunteerism and developing local stakeholder interest in the preserve and its natural resources” (National Park Service 2014).

“The [National Bison Range] will use on-line, citizen science bird monitoring platform (eBird.org) for continued surveillance of occurrence using volunteers and the public to monitor population trends and inform management” (Fish and Wildlife Service 2019).

Table 1. Number of Environmental Impact Statements categorized by citizen science application, data usage, and data source. Data usage conveys whether citizen science data was used to document species presence or species absence and is only applicable for direct use citizen science application. The data usage and data sources categories are not exclusive (i.e., a paper that uses iNaturalist and eBird data will be included in both categories).

Category	n
Citizen Science Application	
Direct	147
Indirect	43
Nondescript	10
Suggested/Encouraged	46
Data Usage	
Presence	127
Absence	28
Data Source	
iNaturalist	9
eBird	129
Citizen/Community Science	36

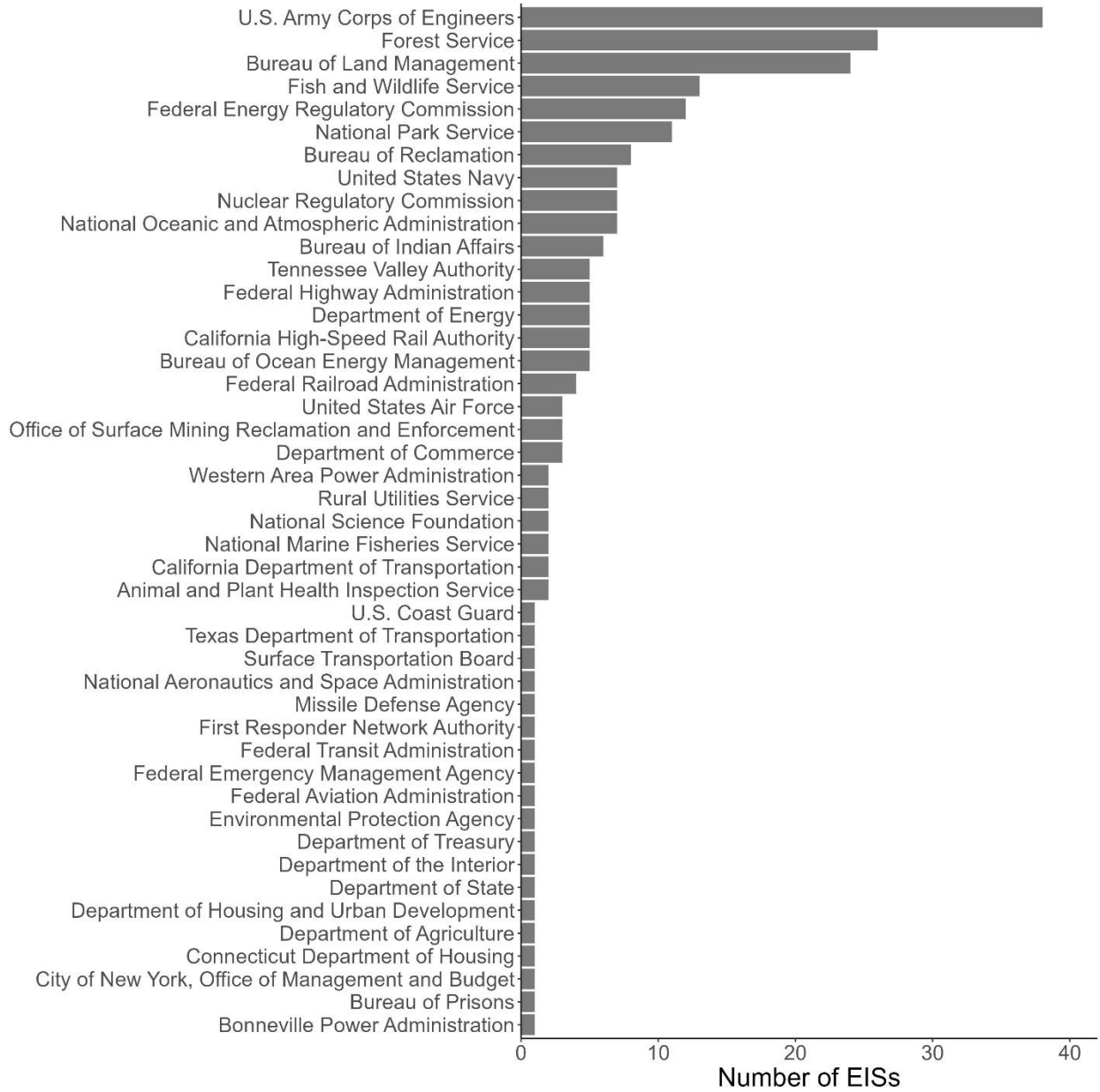


Figure S1. Number of Environmental Impact Statements from our search about citizen science by agency.

Supplementary Text 1. A detailed overview of our methods for the coding of EISs.

To facilitate the organization and categorization of the gathered data, formal definitions were established. These definitions were used to classify how citizen science was used in each Environmental Impact Statement (EIS).

The following formal definitions were employed for coding the data:

1. **Direct Use:** This category was employed to identify instances where citizen science methods were directly applied to identify species of interest in the project area. In the assessment's context, citizen science was used to gather evidence of the presence or absence of bird species in the project area. The direct use category was further classified into three subcategories: presence, absence, or both. "Presence" referred to cases where the species of interest were observed within the project area, "absence" indicated that there were no reports of the species of interest in the project area, and "both" indicated instances where one species was observed while another was not in the project area.
2. **Indirect Use:** This category encompassed situations where information obtained from mobile applications or websites, such as eBird or iNaturalist, was employed as background or reference data in an EIS. Such information served purposes such as providing reference materials for assessments, species information, or reviewing habitats.
3. **Nondescript/Inconclusive:** This category was utilized when the use of citizen science methods in the EIS was unclear or mentioned in passing without providing sufficient detail.
4. **Encouraged/Suggested:** This category denoted instances where citizen science methods were not directly used in the analysis but were recommended or suggested to bridge knowledge gaps. This category also encompassed situations where the project itself promoted the use of citizen science.
5. **False Positive:** This category specifically referred to cases where the search term resulted in an unintended result. For example, the search term "eBird" included documents with the term "shorebirds" (shor[ebird]s). These documents were removed from further analysis.

By employing these formal definitions and coding criteria, the data collected from the documents were effectively categorized, allowing for a systematic analysis of the utilization of citizen science methods in the EISs.

Supplementary Text 2. References for Box 1.

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