

**SUPPORTING STATEMENT
REPORTING OF SEA TURTLE ENTANGLEMENT IN FISHING GEAR
AND MARINE DEBRIS
OMB CONTROL NO. 0648-0496**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This request is for extension of a current information collection. Also, the title of the collection has been changed from “Reporting of Sea Turtle Entanglements in Pot Gear Fisheries” to “Reporting of Sea Turtle Entanglement in Fishing Gear and Marine Debris”.

Four sea turtle species migrate northward along the east coast of the United States (U.S.) to forage in nearshore habitats of the Greater Atlantic Region (Virginia through Maine) during the spring, summer, and fall. These species include juvenile and sub-adult loggerhead (*Caretta caretta*), Kemp’s ridley (*Lepidochelys kempii*), and green (*Chelonia mydas*) sea turtles, and sub-adult and adult leatherback sea turtles (*Dermochelys coriacea*). The prevalence of vertical line from fixed gear fisheries (pot traps and gill nets) in these nearshore habitats makes the potential for interaction between turtles and fisheries high. From 2002 through 2013, the National Oceanic and Atmospheric Administration’s (NOAA) Greater Atlantic Regional Fisheries Office (GARFO) received 402 reports of entangled sea turtles, the majority of which were leatherbacks (327 reports).

GARFO is working to reduce sea turtle mortality and serious injury associated with fixed fishing gear interactions, as well as to increase our understanding of these events through the facilitation of the Sea Turtle Disentanglement Network (STDN). The objectives of this program include: (1) to promote reporting and increase successful disentanglement; (2) to develop and disseminate disentanglement guidelines for the STDN; (3) to disseminate disentanglement tools specific to sea turtles; and (4) to establish a trained and equipped network to respond to reported entanglement incidents. The Sea Turtle Disentanglement Guidelines and the Sea Turtle Entanglement Report Form (STERF) (and associated instructions) have been distributed to members of the STDN for the documentation of all entanglement and disentanglement events.

The STDN is made up of federal and state agencies, as well as members of the Sea Turtle Stranding and Salvage Network (STSSN). The STSSN includes non-profit organizations, state and municipal agencies that are trained and experienced in sea turtle stranding response on land. Their skills and geographic distribution throughout the region make them ideal members of the STDN. Federal and state agencies involved in the STDN include the United States Coast Guard (USCG), state environmental police, state marine patrols, and other agencies whose primary function involves the marine environment. These agencies have line handling and on-water expertise, as well as the accessibility to the marine environment to facilitate a safe and timely response to entangled sea turtles.

Detailed information, including frequency, geographic distribution, configuration, and gear description, regarding sea turtle entanglement in fixed gear fisheries, is necessary for NOAA

Fisheries to potentially be able to mitigate this threat. Mitigating threats and conserving these species is mandated by the [Endangered Species Act of 1973, as amended](#) (ESA). This information will help to assess the impact of fixed fishing gear entanglement on sea turtle populations in the Greater Atlantic Region and determine if regulatory actions or management measures are necessary. Lack of observer coverage for the majority of pot fisheries makes this information collection especially critical.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The Sea Turtle Disentanglement Guidelines and STERF were disseminated to the STDN in July of 2004 after OMB emergency clearance, effective June 25, 2004. Full OMB clearance occurred in December of 2004.

Since then, members of the public have been requested to report any entangled sea turtles to NOAA Fisheries (since 2002, approximately 62.2% of telephone reports came from private citizens (including fishermen), 6.7% from businesses (including charter vessels and ferries), 10.9% from federal agencies, 6.7% from state and local agencies, and 6.0% from non-profit institutions or researchers (7.4% came from unknown sources). Information provided in these phone calls, usually private recreational boaters, includes: reporting party name and contact information, date and time of observation, location (including latitude and longitude), description of turtle for species identification, condition of turtle— alive or dead, description of entangling gear (rope, line, buoys, colors, ID numbers), location of entangling gear on turtle (head, flippers, single wrap, multiple wraps), description of any visible injuries, and if photo documentation can be obtained. Upon receiving a report of an entangled sea turtle, the appropriate STDN member is deployed to respond, for further documentation, disentanglement, and/or treatment of the animal. The STDN member uses the information from the initial report, plus details obtained during response, to fill out the STERF. The STERF is submitted to NOAA Fisheries via fax, postal mail or email.

These report forms are archived by NOAA Fisheries GARFO Protected Resources Division. During the past ten years, this information has been used to monitor the level of incidental take of sea turtles in fixed gear fisheries in the region. The information is distributed to the Northeast Fisheries Science Center and the Office of Protected Resources at NOAA Headquarters, as needed and as requested. It is also used within GARFO for management actions such as ESA section 7 consultations.

From 2004 to 2013, the STDN received 366 sea turtle entanglement reports, and documentation has been of much higher quality than prior to 2004. The STDN has been able to obtain more high quality images and video, increasing the number of “confirmed” reports and expanding our understanding of sea turtle entanglements. The amount of gear collected from sea turtle entanglement events and sent to NOAA Fisheries GARFO Protected Resources’ Gear Team for analysis has also increased in this period. We have specifically used the information collected in the “Gear Type” and “Gear Details” sections of the STERF to positively identify the target fishery involved in many entanglements, which allows for better monitoring of the number of

takes per fishery. The “Buoy ID Numbers” field on the STERF has proven especially valuable in allowing us to trace entangling gear back to its owner, and conduct a follow-up interview with that fisherman. The Gear Team conducts these interviews, which gather the following information:

- 1) Gear type and target species;
- 2) Gear configuration and construction;
- 3) Date and location gear was last set;
- 4) Bottom type and current influence;
- 5) Location of turtle in the gear configuration; and
- 6) Whether the fisherman witnessed the entanglement and, if so, a description of the chain of events.

This information is not available through any other means or collected on any other form. It is extremely valuable to better understand entangling gear configuration and the manner in which it is set.

The “Entanglement /Wound Description,” “Entanglement/ Wound Diagram,” and “Event Summary and Additional Remarks” sections have provided vital information on the nature of entanglements, including the location of the gear on the turtle and any associated wounds. The check boxes in the first of these sections were created in an effort to have consistency in wound and gear configuration descriptions to better evaluate the severity of entanglements. Information is also collected on the sea turtle’s size and sex in order to define the age and sex classes that are most impacted by entanglement.

Summary of the three steps:

1. The initial report comes in from (usually) a private boater. Some of the info that will later be put on the entanglement form will come in during that initial report. The reporting party will often also stand by the turtle to wait for responders to arrive.
2. The STDN responds and while they are on scene, they collect the rest of the information to fill out the form.
3. If there is gear identification information (buoy numbers, etc.) that allows identification of the gear's owner, our gear specialists can contact the owner to interview him about the gear's configuration and target catch.

Detailed information on the type and configuration of fishing gear, location of gear on the turtle, severity of injuries, location and date of the event, and demographics of entangled turtles create a base of knowledge of sea turtle entanglement in fixed fishing gear. This information will help direct future gear modification research and potential mitigation measures. In addition, it will help us identify the safest and most efficient methods and tools for disentangling sea turtles, with the direct result of decreasing sea turtle serious injury and mortality in these entanglements. The use of these data is consistent with the general actions stated in the sea turtle recovery plans (i.e., minimize mortality from commercial fisheries).

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent

with NOAA standards for confidentiality, privacy, and electronic information. See response to Question10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Members of the general public are requested to report all sea turtle entanglements via telephone to the STDN or to NOAA Fisheries directly, by the information at http://www.nero.noaa.gov/prot_res/stranding/reportstranding.html. The STDN members that complete the STERF will do so either electronically using the fillable PDF (71% in the last three years) or in hard copy that is later scanned (29%). Either way, in the last three years, nearly 100% of submissions to NOAA Fisheries were done via electronic mail. As only trained STDN responders are authorized to disentangle sea turtles, we only post the disentanglement guidelines and STERF on a private website with limited access.

4. Describe efforts to identify duplication.

Historically, NOAA Fisheries did not collect this information directly but occasionally received reports from a variety of agencies and the public. The establishment of the STDN developed consistent disentanglement guidelines and reporting protocols to standardize the collection of this information. These documents ensure that takes are reported and vital information on sea turtle entanglements are recorded on a real-time basis. The data requested in the Sea Turtle Disentanglement Guidelines and STERF were not required or requested prior to the first PRA submission in 2004 and they are not collected elsewhere.

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

This information collection will not have a significant impact on small entities. Small entities, including STDN members (typically non-profit institutions) and fishermen, are involved in this information collection but the impacts are minimized by the relatively infrequent nature of the reporting. Sea turtles are typically present in the Greater Atlantic Region from May to November; therefore, reporting and information collection occurs only during these months. All information collection is opportunistic and, therefore, is only collected as frequently as entangled turtles are encountered. The number of reports varies annually, but the most reports per year to date were 76, which occurred in 2013. The STERF is available in a fillable form, which allows STDN members to send it to NOAA Fisheries using electronic mail. This method saves the cost of postage and requires less time for submission. The cost of documentation involving photographs is minimized through the use of digital cameras supplied to the STDN by NOAA Fisheries. Digital photographs can also be sent via electronic mail, meaning there is no cost to developing or sending these images. NOAA Fisheries also covers the cost associated with shipping forms, photos, video and any removed gear, as necessary. There would be no financial

burden to fishermen because calls would be made by NOAA Fisheries staff and all information would be gathered during that call.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

NOAA Fisheries believes that sea turtle entanglement in fixed fishing gear is a significant source of mortality for leatherback and loggerhead sea turtles based on anecdotal reports and information collected to-date by the STDN and the STSSN. There is little or no observer coverage in most pot gear fisheries, which means that data collection using the STERF is the only way of assessing sea turtle take in these fisheries. If NOAA Fisheries does not continue to disseminate disentanglement guidelines and STERFs, information on sea turtle entanglement in fixed gear fisheries would likely become inconsistent, slow, and potentially lacking important data. The disentanglement guidelines also provide the STDN with standard methodology for disentanglement that will ensure consistent and appropriate actions to maximize positive outcomes in these events.

In addition, if reports are not received in a timely manner, turtles that are injured by entanglement in fixed fishing gear would not receive appropriate medical treatment. Dead entangled turtles would not be documented through thorough data collection and, if appropriate, necropsy by the STDN. GARFO has dedicated a significant amount of funding and staff time to establishing the STDN and collecting information that is essential to understanding sea turtle entanglement in fixed fishing gear and mitigating the negative impact of these interactions. Acquiring this information to fulfill the aforementioned objectives is an important aspect of the GARFO sea turtle program.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The collection of this information may be inconsistent with the OMB guidelines, Item #1. Item #1 states that the information collection should not require respondents to report information more often than quarterly. Real-time reporting of entangled sea turtles is critical to facilitating trained and authorized responders being able to relocate and disentangle turtles, thereby increasing their chance of survival. Reporting and documentation of entanglement would thus need to be collected more frequently than on a quarterly basis. Sea turtles are generally present in the Greater Atlantic Region from May to November and there could be reports of entangled sea turtles at any time during that period. For example, multiple entangled sea turtles may be encountered in one day or one entangled sea turtle may be encountered in a month. Given the necessity for real-time reporting, there is the potential for members of the STDN, though likely not any specific member of the public, to report sea turtle entanglements more often than quarterly.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A Federal Register Notice published on February 12, 2014 (79 FR 8433) solicited public comment. No comments were received as a result of this notice.

The Sea Turtle Disentanglement Guidelines and STERF were originally compiled with input from the following organizations external to GARFO STDN, state agencies, Canada Department of Fisheries and Oceans, Dalhousie University, USCG, U.S. Fish and Wildlife Service, Sea Grant, and fishermen. Draft changes to the document were distributed to members of the STDN and feedback was solicited prior to finalization of both documents. NOAA Fisheries consistently works with the STDN and interacts regarding the submission of data, including the use of the STERF. NOAA Fisheries has not received any negative feedback that would result in changes to be made to the STERF or the Disentanglement Guidelines.

NOAA Fisheries solicited comments about this data collection from STDN members during this renewal process in 2014. The Center for Coastal Studies stated that they had no comments.

The Virginia Aquarium (VAQS) submitted the following, “The STSSN Stranding Report form adequately summarizes basic stranding information, but the NOAA Sea Turtle Entanglement Report Form provides a consistent standard for accurately documenting the various entanglements. The time burden for completing and reporting the extra information seldom exceeds more than an hour per entanglement case. VAQS frequently reports entanglement data and the provided entanglement report form provides a relatively straightforward platform for reporting accurate data, particularly for recording the intricacies in various gear types. The burden for the caller is likely to be 1-2 hours, depending on their location and the time needed for VAQS to respond. Documenting and reporting the nature of entanglements in a timely fashion, as well as potentially identifying the source of entanglements, provides crucial data for continued sea turtle conservation and fisheries management.”

The last organization that responded was the Mystic Aquarium, which asked a question regarding reporting the time burden of multiple phone calls during response coordination. I responded to them specifying that the time burden documented in this PRA package was specifically for collecting the data that is requested in the STERF and not for response coordination, per se. Response is a part of the normal operations of STDN organizations and would continue whether or not NOAA Fisheries requested these data to be collected. Therefore, the time burden of calls to identify boat resources, coordinate responders, etc. was not included here.

NOAA Fisheries received no further questions or comments.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents.

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

As stated on the form, personal identifiers and any commercial information will be kept confidential to the extent permitted under the [Freedom of Information Act](#) (FOIA) (5 U.S.C. 552), the [Department of Commerce FOIA regulations](#) (15 CFR Subpart A, Part 4), the [Trade Secrets Act](#) (18 U.S.C. 1905), and [NOAA Administrative Order 216-100](#).

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 collection of information does not involve any questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

The total hour estimate for the reporting requirement was determined from the following information:

The number of reports was determined by the anticipated number of entangled sea turtles to be encountered annually in the waters of the Greater Atlantic Region. Since OMB's initial clearance of the Sea Turtle Disentanglement Guidelines and STERF in 2004, NOAA Fisheries has received 366 reports of entangled sea turtles in the region. Those reports ranged from a low of 12 in 2006 to a high of 76 in 2013, with an average of 36.6 reports per year. We used the highest number of annual reports (rounded to the nearest five), 75, in this calculation as we expect an overall trend of increasing reports over time with increased awareness due to outreach, but recognizing that 2013 was likely an outlier and the next five years would not exceed that number.

Each of these 75 reports begins with a telephone call to the STDN or to NOAA Fisheries. The hourly burden for these calls was calculated by assuming a phone report will last for a maximum of one hour. The time of one hour per report is based on reports where the reporting party provides information and also stands by the turtle while a disentanglement responder is dispatched to the scene. Such scenarios encompass the majority of sea turtle entanglement reports. Therefore, with 75 reports lasting one hour per report, the hourly burden would be 75 hours.

The STDN responder in closest proximity to the entangled turtle will typically mount a response, during which they will collect further information about the event and provide photo-documentation. The STDN member then takes this information, as well as the information from the reporting party, and completes the STERF. They submit the photographs, STERF, and any entangling gear collected during the response to NOAA Fisheries. We estimate that completing

the form and data submission will take approximately one hour, requiring approximately an additional 75 hours' time commitment annually.

Interviews with fishermen can only be conducted if buoy or trap numbers are collected from entangling gear and transferred to the NOAA Fisheries Protected Resources Gear Team in a timely manner. Since 2004, identification numbers were collected from entangling gear in approximately 33% of, or 25, sea turtle entanglements. Although interviews were not conducted in all of these cases, this represents an estimated maximum percentage of cases where interviews may be conducted. We estimate that a fisherman interview will take approximately 30 minutes, requiring a total annual time commitment of approximately 12.5 (13) hours.

- 75 reports x one hour for telephone report= 75 hours
- 75 x one hour for completing STERF and submitting STERF, photos and gear= 75 hours. This includes the time for STDN members to take telephone reports.
- 25 x 30 minutes for fishermen interviews= 13 hours

Total annual time commitment= 163 hours.

There are currently 12 (11 non-profit organizations and 1 state agency) STDN network members that have the potential to complete and submit the STERF, photos and gear. There are 75 initial reporting parties (most often general public) and an additional 25 fishermen that will receive interviews. **Therefore, the total number of respondents would be 112. Total responses would be the initial 75 reports, plus 68 responses by STDN members if taking the call = 143. (approximately 90% of the calls are taken by them rather than NMFS), plus the 75 associated STERF forms, and 25 interviews for a total of 243.**

This burden is larger than what was previously approved by OMB due to an increase in reported sea turtle entanglements.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

The cost burden was obtained by using the information on anticipated numbers of reports as presented in Question 12, and the following information:

An estimated 75 reports are anticipated annually. The cost of a one hour phone call, assuming all were made on a land line, was estimated to be \$6 per call. However, the vast majority of calls are made on cell phones, which typically have unlimited talk time; **therefore we have reduced the estimated cost to \$100.** The STERF is most often sent via electronic mail. Any shipping costs for STERFs, photos and/or video, and gear are covered by NOAA Fisheries. Finally, fishermen that participate in interviews will receive the telephone call from the NOAA Fisheries Protected Resources Gear Team staff and, therefore, would not incur a cost.

14. Provide estimates of annualized cost to the Federal government.

The estimated cost to the Federal government will be only in terms of staff hours and supplies. An anticipated 75 reports will be called in to NOAA Fisheries, and each call is expected to last a maximum of one hour. As such, the hourly burden of initial reports to NOAA Fisheries would

be 75 hours. In addition, NOAA Fisheries staff would receive and compile the STERFs and input the data into a database. Each report is expected to take a maximum of 30 minutes to enter including obtaining follow-up information if any fields are left blank. This would require an additional 40 hours of staff time for a total hourly burden on NOAA Fisheries of 115 hours. Most, if not all of the time, these tasks would be completed by the Sea Turtle Stranding and Disentanglement Coordinator. Therefore, the financial burden to NOAA Fisheries would be 115 hours at approximately \$29 per hour, or \$3,335.

NOAA Fisheries supplies the STDN with disentanglement kits and digital cameras on an as-needed basis. Disentanglement kits include disentanglement tools and equipment, documentation supplies, and safety gear. Replacing an entire kit costs approximately \$500.00 or individual items in a kit may be replaced. Digital cameras are used to document the majority of disentanglement events; the approximate cost of a digital camera is \$170.00. The cost of these pieces of equipment would vary on an annual basis depending on whether or not previous equipment needs to be replaced. NOAA Fisheries would also cover shipping of report forms, photographs, video, and any removed gear from the STDN. The cost of this would vary depending on weight of gear shipped (with or without pot, multiple pots, etc.).

15. Explain the reasons for any program changes or adjustments.

As explained in Questions 12 and 13, there are adjustments to reflect the burden and cost more completely and accurately. Due to increased reporting, there are 68 more responses and 64 more hours than previously estimated. In addition, initial telephone calls taken by STDN members rather than NMFS, add 68 responses – not previously accounted for, but burden is covered by the one hour for written reporting. Costs have decreased to \$100, based on almost all calls being made via cell phone.

16. For collections whose results will be published, outline the plans for tabulation and publication.

It is not anticipated that the results of this collection will be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not employ statistical methods.