# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**National Sea Turtle Stranding and Salvage Network Stranding and Gear Interaction Data Collection**

**OMB Control No. 0648-0496**

# Abstract

This is a request for revision and extension of collection 0648-0496 entitled “Reporting of Sea Turtle Entanglement in Fishing Gear or Marine Debris”. We request to revise the name of the collection to “National Sea Turtle Stranding and Salvage Network Stranding and Gear Interaction Data Collection” and add additional forms to be inclusive of all forms used by Sea Turtle Stranding and Salvage Network (STSSN).  NOAA’s National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service (USFWS) share federal jurisdiction for the conservation and recovery of sea turtles. NMFS Office of Protected Resources serves as the lead for and coordinator of the STSSN. The STSSN currently responds to and documents stranded sea turtles found in coastal areas under U.S. jurisdiction along the Atlantic Ocean and Gulf of Mexico. The Sea Turtle Disentanglement Network (STDN) is a part of the STSSN. The STSSN is a cooperative effort of authorized federal, state, and private partners working to inform causes of morbidity and mortality in sea turtles. Information is collected in a manner sufficient to inform sea turtle conservation management and recovery. To facilitate this data collection, the STSSN uses several standardized data collection forms. To ensure all data collected by the STSSN are in the same collection, we propose adding the following forms to 0648-0496: STSSN Stranding Report form, Gross Necropsy forms, Cold Stun individual and batch forms, Fishing Gear Identification forms, and Incidental Capture Intake form (currently approved in collection 0648-0774).

# Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The collection of forms is related to the Sea Turtle Stranding and Salvage Network (STSSN) operating in coastal areas under U.S. jurisdiction along the Atlantic Ocean and Gulf of Mexico. All five species of sea turtles found in U.S. waters are listed as endangered or threatened under the Endangered Species Act (ESA). NMFS and the USFWS share federal jurisdiction for the conservation and recovery of sea turtles. These species include loggerhead (*Caretta caretta*), Kemp’s ridley (*Lepidochelys kempii*), and green (*Chelonia mydas*), leatherback (*Dermochelys coriacea*), and hawksbill (*Eretmochelys imbricata)* sea turtles. This information collection relates to the recovery and conservation of sea turtles through documenting strandings and injuries as part of investigating ongoing threats to sea turtles and mitigation of those threats. Mitigating threats and conserving these species is mandated by the ESA. Section 4(f) of the ESA (16 USC 1531-1544) provides for the creation of Recovery Plans for endangered and threatened species and provides NMFS and USFWS with authority “to procure the services of appropriate public and private agencies and institutions and other qualified persons” in order to implement those plans. To advance the conservation and recovery of listed sea turtles, [each sea turtle recovery plan](https://www.fisheries.noaa.gov/resources/documents?title=&field_category_document_value%5Brecovery_plan%5D=recovery_plan&species%5B1000000045%5D=1000000045&field_species_vocab_target_id=&sort_by=created) developed jointly by NMFS and USFWS identifies and highlights the need to maintain an active stranding network. Both NMFS and USFWS have promulgated regulations that provide an exception to the prohibitions on take and allow for coordinated response to stranded sea turtles in water and on land, based on their specific jurisdictional responsibility.

In accordance with the 2015 Memorandum of Understanding (MOU) between NMFS and USFWS, NMFS has lead responsibility for sea turtles in the marine environment and establishes NMFS as the lead for, and coordinator of, the STSSN to attend to stranded turtles in the marine environment or when washed ashore from the marine environment. USFWS has permitting authority for stranding response and rehabilitation. Participation in the STSSN requires an ESA permit from the USFWS and/or the state where stranding response occurs for on-land response and authorization from NMFS for in-water response. Each permit or authorization requires that the entity comply with all STSSN procedures, which includes a requirement for completing the appropriate STSSN form, including the STERF or appropriate gear or incidental capture form.

Each form is described in detail below, but we will further describe one intended use of this collection by the STDN, here. NMFS recognizes that sea turtle mortality and serious injury associated with fixed fishing gear interactions is a significant issue in the Greater Atlantic region. To address these entanglements, NMFS, Greater Atlantic Regional Fisheries Office (GARFO) facilitates the STDN. The objectives of the STDN include: (1) to promote reporting and increase successful disentanglement, thereby reducing sea turtle mortality; (2) to develop and disseminate disentanglement guidelines for the STDN; (3) to disseminate disentanglement tools specific to sea turtles; and (4) to maintain 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 events. This information is key to understanding and potentially mitigating these events. The prevalence of vertical line from fixed gear fisheries (pot traps and gill nets) in nearshore habitats along the Northeast Atlantic coast makes the potential for interaction between turtles and fixed gear fisheries high. From 2010 through 2019, GARFO received 387 reports of entangled sea turtles, the majority of which were leatherbacks (311 reports, 80.4%).

# 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.

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| **Item #** | **Requirement** | **Statute** | **Regulation** | **Form #** | **Needs and Uses** |
| 1 | Endangered Species Act | 3ESA (16 USC 1531-1544) | These forms are required through ESA permits, not regulations. | All | * Used by the public and permitted STSSN participants. * Used by NMFS and USFWS to evaluate threats to sea turtles. |

All five species of sea turtles found in U.S. waters are listed as endangered or threatened under the Endangered Species Act (ESA). NMFS and the USFWS share federal jurisdiction for the conservation and recovery of sea turtles. Although the STSSN has been in operation for several decades, the Coordination role formally shifted to the NMFS Office of Protected Resources in January 2022. This transition prompted an evaluation of STSSN operations, development of an Operating Procedures Handbook, review of the program under the National Environmental Policy Act (NEPA), and formalization of the STSSN forms through this information collection.

NMFS, as the coordinating agency over the STSSN and STDN, requires that permitted participants complete specific forms to document each event in a standardized way. Each form included in this collection serves a specific and critical role in documenting information on stranded and entangled animals, such that NMFS can use this information to assess threats to sea turtles in the marine environment and work to better manage threats to these endangered and threatened species.

The STSSN and STDN includes non-profit organizations, federal, state and municipal agencies and other entities that are trained and experienced in sea turtle stranding response on land and in water. Their skills and geographic distribution throughout the U.S. make them ideal partners.

In summary, the STSSN forms are required for all permitted STSSN responders, State Coordinators, and State Liaisons. And each form has been developed for a specific need related to the recovery and conservation of sea turtles, and specifically to help inform marine-based threats to sea turtles and provide necessary information for NMFS to evaluate mitigation strategies for those threats.

Information requested for each form in this collection:

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| **Form** | **Information collected** | **From whom will the information be collected?** | **How will the information be collected?** | **What will this information be used for - provide ALL uses?** | **Does the respondent have multiple options for providing the information?** | **How frequently collected?** | **Will information be shared?** |
| STSSN Stranding Report Form | Stranding information: location, species, size, disposition, key injuries, anthropogenic interactions, and other anomalies | Public sources may provide location; Permitted responders collect all other info by documenting the stranded animal. | Phone, paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | Information in this form is currently required to be entered in electronic format to the STSSN database. | Once for each stranding event, these happen periodically through the year, depending on location | Information is shared internally for management, as well as when requested by the public. |
| Gear ID Form | Information on the fishing materials found on a stranded turtle, disposition of materials, information relevant to the gear interaction. | Directly by documenting the stranded animal. | Paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | Submitted electronically. | Completed if a stranded animal is found with gear attached | Information is shared internally for management, as well as when requested by the public. |
| Gross Necropsy Form (short) | Standardized gross necropsy form (2 pages). This form is used for more decomposed strandings and necropsies conducted in the field. Form collects information on the condition of the animal, measurements, anomalies and samples collected. | Directly by documenting the stranded animal. | Paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | Submitted electronically. | Completed if a field or basic gross necropsy is completed on an animal. | Information is shared internally for management, as well as when requested by the public. |
| Gross Necropsy Form (long) | Standardized gross necropsy form (4 pages). This form is used mostly for fresh and moderately decomposed animals and often for animals brought to a facility for a necropsy. Information is collected on the condition of the animal, more detailed information on anomalies, samples collected, and exams conducted. | Directly by documenting the stranded animal. | Paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | Necropsy info is submitted electronically. | Completed if a more comprehensive necropsy is conducted on an animal (i.e. fresh or moderately decomposed) | Information is shared internally for management, as well as when requested by the public. |
| Cold Stun Form and Cold Stun batch Form | Used when responding to a sea turtle that has stranded due to cold stunning. The modified/batch form is used during large-scale event where multiple animals are documented on one form. Information collected is stranding information: location, species, size, disposition, etc. | Directly by documenting the stranded animal. | Paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | This form is currently required to be entered in electronic format to the STSSN database. | Completed for cold-stun related strandings. | Information is shared internally for management, as well as when requested by the public. |
| Incidental Capture Form | Incidental capture information, generally for hook and line captures, including time of day, bait type, hook type, and how and where on its body the turtle was hooked or entangled. | Directly by documenting the stranded animal. | Paper form; entered into database. | Sea turtle threat and mortality investigation; Recovery Planning; ESA section 7 consultations, ESA section 10 permitting, ESA regulatory processes, and similar species management processes. | Yes, provide info by phone to NMFS or directly with the form, either filled out digitally or printed and scanned. | One for each incidental capture on hook and line (generally by rec fisherman on piers) | Information is shared internally for management, as well as when requested by the public. |
| Sea Turtle Entanglement Report Form | Stranding/ incidental capture information: location, species, size, behavior, disposition, gear information, wound information | By the STDN or by NMFS from information relayed from the public. | Phone call with initial info; NMFS or STDN records on digital, fillable form or on paper form that is later entered. | Threat and mortality investigation, post-interaction mortality assessment. | Yes, provide info by phone to NMFS or directly with the form, either filled out digitally or printed and scanned. | One for each entanglement event. | Information is shared internally for management, as well as when requested by the public. |

**Previously approved form and historical use:** The Sea Turtle Disentanglement Guidelines and STERF were first disseminated to the STDN in July of 2004 after OMB emergency clearance, effective June 25, 2004. Full OMB clearance occurred in December of 2004. The form has been renewed several times. There have been no significant changes to these disentanglement documents or to the collection since the last renewal. We continue to use the STERF to document each entanglement case, the number of which vary by year based on a variety of factors. These data are entered into the STSSN database, as well as maintained by the NMFS GARFO Protected Resources Division. When possible, interviews are conducted with fishermen to maximize the amount of gear information we can obtain from each case. These data are important in management efforts, including section 7 consultations and post-interaction mortality assessments.

1. **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.**

Members of the public are requested to report all sea turtle strandings and entanglements via telephone to the STSSN in their state, or to NMFS directly. The STSSN and STDN permitted participants will complete the STSSN, STERF, gear forms, and necropsy forms in hard copy or through fillable electronic formats, then data is entered into the STSSN database where it is validated by State Coordinators or NMFS staff.

1. **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 Question 2**

The STSSN is the only network of individuals that is collecting this particular information. As mentioned in response to previous questions, all species of sea turtles are listed as endangered or threatened under the ESA, and all response and rehabilitation efforts require permits from the USFWS and/or a state agency, and the STSSN is coordinated by NMFS. As such, the only permitted and authorized entities to collect this information in the U.S. are participating organizations under the STSSN. Several state agencies have historically collected data on strandings, but NMFS has worked over the past decades to reduce duplication and ensure that the forms used by the STSSN meet all the needs of the Federal and state governments. This collection includes several separate forms, with minimal duplication across all forms. Each form was created for a specific purpose and the forms completed will depend on the stranding event specifics. For some animals, multiple forms may be filled out for a given animal, such as an STSSN Stranding Report form, Gear ID form, and Necropsy (short or long) form if a dead animal strands with unidentifiable gear attached to it. For an entangled turtle found in the water, the STERF would be filled out, but not the STSSN Stranding Report form since there is duplication of basic stranding data, across those two forms.

The data requested in this collection are not required or collected elsewhere.

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

This information collection will not have a significant impact on small entities. Many STSSN and STDN permitted organizations are small businesses or small entities (typically non-profit institutions, state agencies, and universities), but each one has specifically requested permit authority to participate in the STSSN and STDN and are aware of the required information collection. Other individuals from the public, such as fishers or beach goers, may be involved in reporting a stranding or entanglement event, but the burden will be low, and it would be their voluntary choice, not a requirement, to report the event to the STSSN, STDN, or to NMFS directly. Additionally, the impacts to fishers or the general public are minimized by the relatively infrequent nature of the reporting.

All information collection is opportunistic and, therefore, is only collected as frequently as strandings or entangled turtles are encountered. All forms in this collection are available in an electronically-fillable form, which allows permitted participants to fill it out on the computer and send it to NMFS using electronic mail or enter the forms directly into the STSSN database. 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. Digital photographs can also be sent via electronic mail, meaning there is no cost to developing or sending these images. NMFS 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 interview calls would be made by NMFS staff and all information would be gathered during that call.

1. **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.**

As mentioned in response to previous questions, NMFS and the USFWS share federal jurisdiction for the conservation and recovery of sea turtles. In accordance with the 2015 Memorandum of Understanding (MOU) between NMFS and USFWS, NMFS has lead responsibility for sea turtles in the marine environment and establishes NMFS as the lead for, and coordinator of, the STSSN to attend to stranded turtles in the marine environment or when washed ashore from the marine environment. USFWS has permitting authority for stranding response and rehabilitation.

The data collected through the STSSN and STDN are critical for NMFS’ role in the conservation and recovery of sea turtles. The data collected through the STSSN serves as the most consistent and reliable data source on sea turtle presence in various water-bodies, threats they encounter in the marine environment, and the general health of wild populations. NMFS believes that stranding and entanglement reports are a way to evaluate and further understand the nature and magnitude of sea turtle interactions with many fisheries, particularly in the fisheries where observer coverage is limited.

The management, conservation and recovery of sea turtles requires a large variety of data, from multiple sources. Often STSSN data contributes significantly to the best available data for certain coastal areas. STSSN data is used to inform many statutory requirements, such as ESA Section 7 consultations, the issuance of ESA section 10 permits, and the development of regulatory actions.

If STSSN and STDN data were not collected in a systematic way, and if NMFS did not take the lead on collating and summarizing that data, NMFS would lose an important data set that is used for conservation and recovery of these endangered and threatened species. We would not be able to appropriately monitor and mitigate mortality sources in the marine environment, both natural and anthropogenic.

1. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**

The collection of this information may be inconsistent with the OMB guidelines, #1 and #2.

Item #1 states that the information collection should not require respondents to report information more often than quarterly. Real-time reporting of stranded sea turtles is critical for STSSN responders to be able to locate stranded sea turtles, free them if they are captured or entangled, and/or bring them to a rehabilitation facility, thereby increasing their chance of survival. Reporting and documentation of stranding would thus need to be collected more frequently than on a quarterly basis. For example, multiple stranded sea turtles may be encountered in one day, while in other cases few are encountered in a month. Given the necessity for real-time reporting, there is the potential for members of the STSSN, though likely not any other specific member of the public, to report sea turtle strandings more often than quarterly.

Item #2 states that respondents should not be required to prepare a written response to a collection of information in fewer than 30 days after receipt of it. The STSSN and STDN encourage the public to call the STSSN immediately, or in a timely manner, so that responders can quickly respond to the animal. After an event has occurred, the permitted participants of the STSSN are asked to submit their forms as soon as possible, or within 30 days of the event, so that the information collected is as complete as possible. If a responder doesn’t fill out the form quickly, their memory of the event and the information requested may wane and become less accurate. Specifically for any fisheries interactions, if fishing gear is involved in the entanglement the STERF or Gear ID form must be completed in a timely manner so that the NMFS gear team can identify the gear and, if applicable, interview the gear owner, and return the gear. Interviews include information about how the gear was set, when it was last seen, when it was noted as missing, etc. that would not be remembered if too much time passed.

1. **If applicable, provide a copy and identify the date and page number of publications 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 describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day *Federal Register* Notice published on July 5, 2022 (87 FR 39806). No comments were received.

Several STSSN state coordinators, state liaisons, and regional coordinators were contacted 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. No comments were received.

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

No payments or gifts will be provided to respondents.

1. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

No Personal Identification Information (PII) will be collected. Information will be stored in the STSSN database. 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 Part 4, Subtitle A), the Trade Secrets Act (18 U.S.C. 1905), and NOAA Administrative Order 216-100.

1. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

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

1. **Provide estimates of the hour burden of the collection of information.**

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| **Information Collection** | **Type of Respondent (e.g., Occupational Title)** | **# of Respondents/ year (a)** | **Annual # of Responses / Respondent (b)** | **Total # of Annual Responses (c) = (a) x (b)** | **Burden Hrs / Response (d)** | **Total Annual Burden Hrs (e) = (c) x (d)** | **Hourly Wage Rate (for Type of Respondent) (f)** | **Total Annual Wage Burden Costs (g) = (e) x (f)** |
| STSSN Stranding report form | STSSN participants, Federal and state employees | 750 | 6-7 | 5,000 | 0.25 | 1,250 | $29.32 | $36,650 |
| Gear identification form | STSSN participants, Federal and state employees | 150 | 2 | 300 | 0.167 | 50 | $29.32 | $1,466 |
| Gross necropsy form (2pg) | STSSN participants, Federal and state employees | 140 | 5-6 | 800 | 0.167 | 134 | $29.32 | $3,930 |
| Gross necropsy form (4pg) | STSSN participants, Federal and state employees | 140 | 1-2 | 200 | 0.25 | 50 | $29.32 | $1,466 |
| Cold stun form (full and batch forms) | STSSN participants, Federal and state employees | 50 | 10 | 500 | 0.167 | 84 | $29.32 | $2,463 |
| Incidental capture intake form | STSSN participants, Federal and state employees | 150 | 3-4 | 500 | 0.083 | 42 | $29.32 | $1,232 |
| STDN Entanglement form | STSSN participants, Federal and state employees | 13 | 6 | 78 | 0.25 | 20 | $29.32 | $587 |
| STDN Telephone reports | Private citizens (majority) STSSN participants, Federal and state employees | 78 | 1 | 78 | 0.5 | 39 | $29.32 | $1,144 |
| STDN Fisher interviews | FIshers | 25 | 1 | 25 | 0.5 | 13 | $28.28 | $368 |
| **Totals** |  |  |  | **7,481** |  | **1,682** |  | **49,306** |

STSSN and STDN includes non-profit organizations, federal, state and municipal agencies and other entities that are trained and experienced in sea turtle stranding response on land. All forms listed here will be completed by STSSN and STDN participants. Note that several forms may be completed for one stranded sea turtle. For example, for a sea turtle that strands with fishing gear attached, the STSSN participant would complete the STSSN Stranding Report Form, the Gear Identification Form, and potentially a Gross Necropsy Form.

The hourly wage rate was obtained from BLS Employer Costs for Employee Compensation Summary (March 17, 2023; <https://www.bls.gov/news.release/ecec.nr0.htm>). We used the civilian rate for all respondents with the exception of fishers, for which we used the “first-line supervisors of farming, fishing, and forestry workers” hourly rate.

The STSSN Stranding Report Form: This is a standardized form, used by all STSSN participants to document strandings of sea turtles. The form is tailored for each state with relevant contact information specific to the state. The STSSN Stranding Report is designed to focus on key injuries, anthropogenic interactions, and other anomalies. Detailed instructions for filling out the STSSN Stranding Report are available to responders to ensure strandings are evaluated similarly and data are collected consistently across all responders.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of strandings that occur annually. Based on stranding data from the last 10 years, we estimate this to be 5,000 annually or 15,000 over three years.
* Estimated number of respondents: 750. On average, each respondent will complete 6-7 forms annually, however as stranding abundance varies based on location, some respondents may complete more or less than this average.
* Estimated time to complete form: 15 minutes

Gear Identification Form: The STSSN Gear Characterization Guide is used to guide the characterization of fishing gear recovered from sea turtles documented by the STSSN and to identify gear that requires subsequent examination by fishery gear experts. ​The objective is the consistent characterization of fishing materials to inform threat identification and monitoring. The guide includes a data collection form that should be used in coordination with the guide and specific criteria for the collection and referral of gear for expert review. The guide and form are intended to assist the STSSN in documenting a wide range of gear types, including recreational hook/line, commercial longline, pot/trap, and gillnet.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of strandings that have fishing gear attached annually. Based on fishery gear interaction reports from the last 10 years, we estimate this to be 300 annually or 900 over three years.
* Estimated number of respondents: 150. On average, each respondent will complete 2 forms annually, however as stranding abundance and interactions with fishing gear vary based on location, some respondents may complete more or less than this average.
* Estimated time to complete form: 10 minutes

Gross necropsy form (2-page and 4-page forms): Standardized gross necropsy forms have been developed by the STSSN for necropsy of sea turtles. These forms are formatted and worded such that they are complementary to the STSSN Stranding Report in order to facilitate standardized collection of information necessary to inform sea turtle conservation management. Two versions of the form exist, a 4-page format and an abbreviated 2-page format. Users may select the form most suitable based on the postmortem condition of the turtle, specific needs and circumstances of a given case. The shorter version is used most frequently. Users may also use other necropsy forms, such as those developed by facilities or organizations to which they are affiliated, as long as similar data fields are clearly included.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of strandings and their postmortem condition or needs based on stranding circumstances. We estimate that 20 percent of stranding sea turtles will need to be necropsied. Based on this estimate, 800 2-page gross necropsy forms and 200 4-page necropsy forms will be completed annually, or 2,400 and 600 over three years, respectively.
* Estimated number of respondents: 140. On average, each respondent will complete 5-6 2-page gross necropsy forms and 1-2 4-page gross necropsy forms annually, however as stranding abundance and need for necropsies vary based on location, some respondents may complete more or less than this average.
* Estimated time to complete form: 10 minutes (2-page form), 15 minutes (4-page form).

Cold Stun Event Form and Cold Stun Event Batch Form: Respondents would complete one of these forms when responding to a sea turtle that has stranded due to cold stunning. A modified and simplified version (batch form) is available for use during large-scale cold stun events when large numbers of animals are triaged in a short period of time. The cold stun batch form allows for critical information to be collected on individual animals and the batch form allows for groups of turtles to be processed and documented together.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of cold stun strandings. Cold stuns often occur in discrete areas in large numbers. Cold stun events are inter-annually variable, however, based on previous data, we estimate 500 Cold Stun Event Forms (full for individual turtles) or Cold Stun Event Batch Forms (for multiple cold-stunned turtles) will be completed annually, or 1,500 over three years.
* Estimated number of respondents: 50. On average, each respondent will complete 10 Cold Stun Forms, however as cold stun events occur in discrete areas, some respondents may complete more or less than this average.
* Estimated time to complete form: 10 minutes (individual or batch form)

Incidental Capture Intake Form (currently in Angler Survey collection 0774 which expires December 31, 2024 and will be moved to this collection): This form will be filled out by a STSSN participants when a turtle is incidentally captured, regardless of whether the capture occurs during a specific survey period, and collects information on the specific interaction, including time of day, bait type, hook type, and how and where on its body the turtle was hooked or entangled. This information is necessary as it can be compared to the angler survey data to identify if certain factors or fishing practices influence the rate of interactions.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of incidental captures that are reported to the STSSN. These reports include strandings that the STSSN responds to, and those where the turtle was not captured (e.g., the turtle broke the fishing line and swam away, or the hook came loose, etc.). Based on fishery gear interaction reports from the last 10 years, we estimate this to be 500 annually or 1,500 over three years.
* Estimated number of respondents: 150. On average, each respondent will complete 3-4 forms annually, however as stranding abundance and interactions with fishing gear vary based on location, some respondents may complete more or less than this average.
* Estimated time to complete form: 5 minutes

Entanglement Form: The sea turtle entanglement form is intended to be filled out by a STSSN or Sea Turtle Disentanglement Network member to document sea turtle entanglements in vertical lines or other gear in-water.

* Estimated number of times the form will be completed annually: The number of forms completed annually is dependent upon the number of entanglements in fishing gear that are reported to the STDN. Based on fishery gear interaction reports from the Greater Atlantic Region since OMB’s initial approval of the collection, we estimate that 78 forms will be completed annually or 234 over three years. In addition to the form, respondents submit any associated photographs, video, STERF, and any entangling gear collected during the response to NMFS.
* Estimated number of respondents: 13. On average, each respondent will complete 6 forms annually, however as stranding abundance and interactions with fishing gear vary based on location, some respondents may complete more or less than this average.
* Estimated time to complete form: 15 minutes

STDN Entanglement Reports: Each of the anticipated entanglement reports begins with a telephone call to the STDN or to NMFS.

* Estimated number of times reports will be completed annually: The number of entanglement reports annually is dependent upon the number of entanglements in fishing gear that are reported to the STDN. Based on fishery gear interaction reports from the Greater Atlantic Region since OMB’s initial approval of the collection, we estimate that 78 reports will be completed annually or 234 over three years.
* Estimated number of respondents: 78. On average, each respondent will report an entanglement 1 time annually. Respondents are generally members of the public.
* Estimated time to complete the report: 30 minutes. Each phone report is estimated to last for a maximum of 30 minutes. NMFS previously estimated 1 hour, but recent data has shown that these calls rarely exceed 30 minutes. The time of 30 minutes 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.

STDN Entanglement Reports: Interviews with fishermen are conducted if buoy or trap numbers are collected from entangling gear and transferred to the NMFS GARFO gear team in a timely manner.

* Estimated number of times interviews will be completed annually: The number of fisher interviews annually is dependent upon the number of entanglements in fishing gear that are reported to the STDN. Based on fishery gear interaction reports from the Greater Atlantic Region since OMB’s initial approval of the collection, we estimate that the maximum number of interviews that will be conducted annually is 25, or 75 over three years.
* Estimated number of respondents: 25. On average, each fisher respondent will be interviewed one time annually.
* Estimated time to complete the interview: 30 minutes. Each interview is estimated to last for a maximum of 30 minutes.

1. **Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

There are no capital/start-up or ongoing operation/maintenance costs associated with the collection of information, with the exception of the STDN entanglement information. Specifically for the STDN, 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 78 phone reports are anticipated annually. The vast majority of calls are made on cell phones, which typically have unlimited talk time. However, to be conservative, we estimated up to 20% of calls could come in on a landline. The cost of a one hour phone call was estimated to be $6 per call. Sixteen calls at $6 per call is $96, rounded up to $100. The Entanglement form is most often sent via electronic mail. Any shipping costs for these forms, photos and/or video, and gear are covered by NMFS. Finally, fishermen that participate in interviews will receive the telephone call from the NMFS Protected Resources gear team staff and, therefore, would not incur a cost.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Information Collection** | **# of Respondents (a)** | **Annual # of Responses / Respondent (b)** | **Total # of Annual Responses (c) = (a) x (b)** | **Cost Burden / Respondent (h)** | **Total Annual Cost Burden (i) = (c) x (h)** |
| Telephone reports (via cell phone) | 62 | 1 | 62 | 0 | 0 |
| Telephone reports (via landline, which is rare) | 16 | 1 | 16 | $6 | $100 |
| Submission of forms (via electronic mail) | 13 | Up to 50 | 78 | 0 | 0 |
| Fisherman interviews | 25 | 1 | 25 | 0 | 0 |
| **TOTALS** |  |  | **181** |  | **100** |

1. **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.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Cost Descriptions** | **Grade/Step** | **Loaded Salary /Cost** | **% of Effort** | **Fringe (if Applicable)** | **Total Cost to Government** |
| **Federal Oversight** |  |  |  |  |  |
| GAR Oversight | ZP3 | $140,500 | 10% |  | $42,150 |
| OPR Oversight | ZP3 | $135,000 | 20% |  | $81,000 |
| OPR Oversight | ZP4 | $196,000 | 15% |  | $88,200 |
| Other Federal Positions |  |  |  |  |  |
| **Contractor Cost** |  |  |  |  |  |
| TX Data Management |  | $37,500 | 100% |  | $12,500 |
| Coordination and Database |  | $145,000 | 95% |  | $413,250 |
| GAR Data Management |  | $112,000 | 10% |  | $33,600 |
| **Travel** |  |  |  |  |  |
| **Other Costs:** |  |  |  |  |  |
| Resupply Stranding Kits  Shipping costs |  |  |  |  | $7,500  $1,200 |
| **TOTAL (over 3 years)** |  |  |  |  | $679,400  ($226,467 annually) |

The estimated cost to the Federal government will be only in terms of staff hours and supplies. The total costs in the table represent costs over three years. Federal staff oversight for the STSSN (OPR staff) includes STSSN coordination, guidance to participants, analysis of collected information, and data entry and verification for the states of Alabama, Mississippi, and Louisiana (where OPR staff are the State Coordinators), and all necropsy and gear identification forms. Federal oversight for the STDN (GAR staff) includes oversight of the networks’ operations, guidance to participants, and analysis of collected information. Contractor costs include: Texas STSSN Data Management support (OPR), STSSN coordination and database development/maintenance and data summaries (OPR) and STDN data management and data summaries (GAR).

NMFS supplies the STSSN with stranding supplies, if and when funds are available. This may include supplies needed for taking measurements, tagging, and/or for properly documenting stranding events (e.g. digital cameras, PIT tag readers, PIT tags, calipers). NMFS GARFO supplies the STDN with disentanglement kits. Disentanglement kits include disentanglement tools and equipment, documentation supplies, and safety gear. Replacing an entire disentanglement kit costs approximately $500.00, but most often only one or two items are replaced at a time. The cost of these supplies would vary on an annual basis depending on whether or not previous equipment needs to be replaced. However, it is estimated that annual equipment costs would be less than or equal to $2,500 annually. NMFS would also cover shipping of report forms, photographs, video, carcasses, and any removed gear from the STDN. While the costs of individual shipments will vary based on the items shipped, the annual cost would likely be less than $400.

1. **Explain the reasons for any program changes or adjustments reported in ROCIS.**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Respondents** | | **Responses** | | **Burden Hours** | | **Reason for change or adjustment** |
| Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision |
| STSSN Stranding Report Form | 750 | 0 | 5,000 | 0 | 1,250 | 0 | Program changes - New form added to the collection. |
| Gear identification form | 150 | 0 | 300 | 0 | 50 | 0 | Program changes - New form added to the collection. |
| Gross necropsy form (2pg) | 140 | 0 | 800 | 0 | 134 | 0 | Program changes - New form added to the collection. |
| Gross necropsy form (4pg) | 140 | 0 | 200 | 0 | 50 | 0 | Program changes - New form added to the collection. |
| Cold stun form (full and batch forms) | 50 | 0 | 500 | 0 | 84 | 0 | Program changes - New form added to the collection. |
| Incidental Capture Intake Form | 150 | 0 | 500 | 0 | 42 | 0 | Program changes - New form added to the collection, moving from another collection. |
| STDN Entanglement form | 13 | 13 | 78 | 78 | 20 | 78 | Program changes - Reduced time needed to collect information. |
| STDN Telephone reports | 78 | 78 | 78 | 78 | 39 | 78 | Program changes - Reduced time needed to collect information. |
| STDN Fisher interviews | 25 | 25 | 25 | 25 | 13 | 13 | No change |
| **Total for Collection** | **750\*** | **116** | **7.481** | **181** | **1,682** | **169** |  |
| **Difference** | 634 | | 7,300 | | 1,513  (+1610 discretion, -97 estimate) | |  |

\*Note: 750 total respondents, as single respondents are anticipated to provide data for several forms.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Labor Costs** | | **Miscellaneous Costs** | | **Reason for change or adjustment** |
| Current | Previous | Current | Previous |
| STSSN Stranding Report Form | $36,650 | 0 | 0 | 0 | Program changes - New form added to the collection. |
| Gear identification form | $1,466 | 0 | 0 | 0 | Program changes - New form added to the collection. |
| Gross necropsy form (2pg) | $3,930 | 0 | 0 | 0 | Program changes - New form added to the collection. |
| Gross necropsy form (4pg) | $1,466 | 0 | 0 | 0 | Program changes - New form added to the collection. |
| Cold stun form (full and batch forms) | $2,463 | 0 | 0 | 0 | Program changes - New form added to the collection. |
| Incidental Capture Intake Form | $1,232 | 0 | 0 | 0 | Program changes - New form added to the collection, moving from another collection. |
| STDN Entanglement form | $587 | $2,514 | 0 | 0 | Program changes - Reduced time needed to collect information. |
| STDN Telephone reports | $1,144 | $2,006 | $100 | $100 | Program changes - Reduced time needed to collect information. |
| STDN Fisher interviews | $368 | $316 | 0 | 0 | Updated wage rate. |
| **Total for Collection** | **$49,306** | **$4,836** | **$100** | **$100** |  |
| **Difference** | $44,470 | | $0 | |  |

1. **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.**

The data collected from these forms will be used in conjunction with previously collected long-term data sets to monitor trends and/or changes in strandings over time. We plan to publish annual stranding summaries, which will be made available to the public. NMFS will collaborate with appropriate partners to analyze and publish data as needed. NMFS has a data access policy for the STSSN data that was developed and agreed upon in coordination with the data providers, which includes the following conditions:

1. NMFS reserves the right to access the STSSN data for sea turtle management purposes.
2. NMFS will provide the appropriate State Coordinators/Liaison with an opportunity to review draft manuscripts, including NOAA Technical Reports or Technical Memoranda that use STSSN data for management purposes.
3. Any publication or use of these data by NMFS will credit the appropriate state STSSN.
4. When NMFS receives a request for STSSN data, NMFS will, within one week, notify the relevant State Coordinators/Liaisons that a data request has been received and is being responded to in accordance with this data process and all applicable Freedom of Information Act (FOIA) requirements.
5. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

1. **Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions."**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).