**SUPPORTING STATEMENT**
**U.S. Department of Commerce**
**National Oceanic & Atmospheric Administration**
**Reporting of Sea Turtle Entanglement in Fishing Gear or Marine Debris**
**OMB Control No. 0648-0496**


## Abstract

NOAA's National Marine Fisheries Service (NMFS) manages the Sea Turtle Disentanglement Network (STDN) to respond to sea turtle entanglement in active or discarded fishing gear (in particular those involving the vertical line of fixed gear fisheries), marine debris, or other line in the marine environment. Entanglement has the potential to cause serious injury or mortality, which would negatively impact the recovery of endangered and threatened sea turtle populations. The STDN's goals are to increase reporting, to reduce serious injury and mortality to sea turtles, and to collect information that can be used for mitigation of these threats. As there is limited observer coverage of fixed gear fisheries, the STDN data are invaluable to NMFS in understanding the threat of entanglement and working towards mitigation.


## 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.

This request is for extension of a current information collection.

Four sea turtle species migrate northward along the east coast of the Unites States 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*).1 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 2010 through 2019, NOAA's National Marine Fisheries Service (NMFS) Greater Atlantic Regional Fisheries Office (GARFO) received 387 reports of entangled sea turtles, the majority of which were leatherbacks (311 reports, 80.4%). Of those, 272 (70.3%) were cases involving vertical line of commercial fisheries.

NMFS GARFO recognizes that sea turtle mortality and serious injury associated with fixed fishing gear interactions is a significant issue in the region. To address these entanglements, GARFO facilitates the Sea Turtle Disentanglement Network (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 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, 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, gear description, and associated injury is necessary for NMFS to potentially mitigate the threat of entanglement in fixed gear fisheries. 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 consistent observer coverage for the majority of pot fisheries makes this information collection especially critical, as it is the only source of information about these events.

**2. 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.**

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 NMFS. In the last 10 years (2010-19), 52.7% of telephone reports came from private citizens, 17.6% from businesses (including charter vessels, ferries, and commercial fishermen), 8.5% from federal agencies, 5.7% from state and local agencies, 4.4% from non-profit institutions or researchers), and 11.1% from unknown sources. Information provided in these phone calls included: 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 the turtle (head, flippers, single wrap, multiple wraps), description of any visible injuries, and if photo documentation could be obtained. Upon receiving a report of an entangled sea turtle, the appropriate STDN member was deployed to respond for further documentation, disentanglement, and/or collection of the animal for treatment at a rehabilitation facility. The STDN member used the information from the initial report, plus details obtained during response, to fill out the STERF. The STERF was submitted to NMFS almost exclusively via email, but could be sent via postal mail or fax, as well.

These report forms are archived by NMFS GARFO Protected Resources Division and they are used to monitor the level and nature 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, as needed and as requested. It is used within GARFO for management actions, such as ESA section 7 consultations. It is also available to federal or state agencies, or the public upon request. Multiple requests were received and filled during the last PRA period. It was used to inform the development of aquaculture Best Management Practices, for states to develop Habitat Conservation Plans, for conservation initiatives such as safe seafood evaluations, and more.

From 2010 to 2019, the STDN received 387 sea turtle entanglement reports; the data collected from these events continues to expand our understanding of sea turtle entanglements, including changing trends in distribution, gears involved, and level of injury. We use the information collected in the "Gear Type" and "Gear Details" sections of the STERF to positively identify the target fishery and, when possible, the gear owner involved in entanglements. Identification of target fishery allows for better monitoring of the number of takes per fishery. Identification of gear owner allows us to conduct a follow-up interview to learn more about how and where the gear was set and its configuration. This information cannot be collected through alternate means and is invaluable to a better understanding of entanglements and potential mitigation measures. The GARFO Protected Resources Division 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; and
5) Whether the fisherman witnessed the entanglement and, if so, a description of the chain of events.

The "Entanglement /Wound Description" and "Behavioral Observations" sections provide vital information, including location of the gear on the turtle, associated wounds, and turtle demeanor, to allow us to estimate post interaction mortality. These sections have been expanded from the original form to the current one in order to better assess the likelihood of survival post release, an important to better evaluate overall mortality due to these interactions. 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.

There are three steps involved in this data collection:

1. The initial report comes in from private citizens, small businesses, federal, state, municipal, or tribal agencies, or non-profit organizations. Some of this initial information will later be used to fill out the entanglement form. The reporting party will often also stand by the turtle to wait for responders to arrive.
2. The STDN, made up of non-profit organizations and federal and state agencies, responds and while they are on scene, they collect the rest of the information to fill out the form

and later submit it, usually via email, to NMFS.

3. If there is gear identification information (buoy numbers, etc) that allows identification of the gear owner (i.e. a small business owner), our gear team can then conduct an interview over the phone.

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 research on gear modification and other 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 events. 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).

Although the data is available upon request by federal and state agencies, as well as the general public, NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NMFS standards for confidentiality, privacy, and electronic information. See response to Question 10 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.

| Item | Form | Needs and Uses |
|---|---|---|
| Phone reports | Sea turtle entanglement report form (STERF) | Phone reports start to populate the STERF with information about the entanglement event. The report initiates response by the STDN. STDN response and subsequent disentanglement reduces mortality of endangered and threatened sea turtles. |
| STDN data submission | STERF | While disentangling a sea turtle, the STDN collects important information, including location, details of the gear, identifying numbers from the gear that will alter facilitate identification of fishery and gear owner, injuries and behavior of the turtle, and entanglement configuration. This information is vital for NMFS to understand the nature of these entanglements, the fisheries involved, and the level of injury and subsequent survival of the turtle. |
| Fisherman interview | STERF | The last piece of information used to populate the STERF is the gear owner interview. This interview provides details on how the gear was set, when it went missing, and permit information that can further shed light on the fishery, type of gear, and portion of the gear most dangerous to |

| | | |
|---|---|---|
| | | turtles. Ultimately, all this information is needed to potentially mitigate these interactions. |

*There are no statutes related to this data collection beyond the Endangered Species Act of 1973 as amended, which provides the need for the data collection in order to better manage these protected species and mitigate the threats to their survival.

**3. 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 entanglements via telephone to the STDN or to NMFS directly. The STDN members that complete the STERF will do so either electronically using the fillable PDF or in hard copy that is later scanned. Either way, in the last three years, nearly 100% of submissions to NMFS 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. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2**

Historically, NMFS 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 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 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. 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 in the last ten years was 78, which occurred in 2013. The STERF is available in an electronically-fillable form, which allows STDN members to fill it out on the computer and send it to NMFS 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 often supplied to the STDN by NMFS. 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.

**6. 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.**

NMFS 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 very little observer coverage in pot gear fisheries, which means that data collected using the STERF are the most comprehensive way of assessing sea turtle take in these fisheries. If NMFS 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 incomplete. 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. NMFS 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 NMFS 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 guideline that requires respondents to report information no more frequently than quarterly. Real-time reporting of entangled sea turtles is critical for STDN responders to be able to locate and free entangled sea 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 other specific member of the public, to report sea turtle entanglements more often than quarterly.

The collection may also be inconsistent with OMB guidelines in that the sea turtle entanglement

report form, including information about the identification of the fishing gear involved in the entanglement, must be submitted in a timely manner, i.e., sooner than 30 days in order to allow for the NMFS gear team to interview the gear owner. 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. Therefore, we ask STDN members to submit entanglement report forms as soon as possible following an event.

The collection will otherwise be conducted in a manner consistent with OMB guidelines.

**8. 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 Federal Register Notice published on March 10, 2017 (82 FR 13309) solicited public comment.

The following was the only response received to the Federal Register notice. "*Nillions of turtles are dying every year because of negligent operation of any efforts by this agency to stop what is gon on in the commercial fishing indsutry. these commercial fishing operations shoudl be checked by interstellar viewing and by the operatives on tehse ships to fine the fishing bessels $1,000 for every turtle they pick up gthat they allow to die. its time to stop this industry from tit wasteful, horrific practices. this agency is doing noting to stop this horror at all. not one finger is lifte don thi s issue. this comment is for the public record please receipt.*" This comment is not within the scope of this information collection and, therefore, is not addressed here. This program involves mitigation of and data collection about sea turtle entanglement in fishing gear, which is arguable and action being made to address the issue stated in the comment.

The Sea Turtle Disentanglement Guidelines and STERF were originally compiled with input from the following organizations external to NMFS: the Greater Atlantic Region STDN, state agencies, Canada Department of Fisheries and Oceans, Dalhousie University, U.S. Coast Guard, U.S. Fish and Wildlife Service, Sea Grant, and fishermen.

NMFS solicited comments about this data collection from two STDN members, the Center for Coastal Studies (CCS) and the Virginia Aquarium (VAQS), during the renewal process in 2020. CCS only had a minor editorial comment about the sea turtle entanglement report form. VAQS provided more detailed feedback, including that the instructions are clear, the frequency of collection is not an undue burden, the format for submission is adequate, and that most data requested is available for them to provide, though some elements may be missing in some cases. They also had relatively minor editorial comments on the sea turtle entanglement report form. All editorial comments were incorporated into the final draft.

NMFS received no further questions or comments.

**9. 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.

**10. 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 on GARFO's server, accessible only to GARFO Protected Resources Division staff. 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.

**11. 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.

**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, NMFS has received 582 reports of entangled sea turtles in the region. Those reports ranged from a low of 12 in 2006 to a high of 78 in 2013 (note: the previous PRA submission had a high of 77 in 2013, but there was one more case discovered since that time), with an average of 36.4 reports per year. We used the highest number of annual reports in this calculation but recognize that 2013 was likely an outlier and the average of the last five years is only 32.4 reports per year.

Each of these 78 reports begins with a telephone call to the STDN or to NMFS. 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 78 reports lasting one hour per report, the hourly burden would be 78 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 and video 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, video, STERF, and any entangling gear collected during the response to NMFS. We estimate that completing the form and data submission will take approximately one hour, requiring approximately an additional 78 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 NMFS GARFO gear team in a timely manner. In the last five years, identification numbers were collected from entangling gear in approximately 31.5% of sea turtle entanglements. Although interviews were not conducted in all of these cases, 31.5% represents an estimated maximum percentage of cases where interviews would be possible. Therefore, using the maximum number of entanglement reports (78) and the maximum percentage of interviews (31.5%), the maximum number of potential interviews is 25. We estimate that a fisherman interview will take approximately 30 minutes.

- 78 reports x one hour for telephone report= 78 hours
- 78 x one hour for completing STERF and submitting STERF, photos and gear= 78 hours
- 25 x one half hour for fishermen interviews= 12.5 hours

**Total annual time commitment= 168.5 hours**

There are currently 13 (11 non-profit organizations and 2 state agencies) STDN network members that have the potential to complete and submit the STERF, photos, video, and gear. There are 78 initial reporting parties (most often general public) and an additional 25 fishermen that will receive interviews. Therefore, the total number of respondents would be 116. Total responses would be the initial 78 reports, plus the 78 associated STERF forms, and 25 interviews for a total of 181.

| Information Collection | Type of Respondent (e.g., Occupational Title) | # of Respondents (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) |
|---|---|---|---|---|---|---|---|---|
| Telephone reports | Private citizens (majority), non-profit, small entities, federal, state or municipal agencies | 78 | 1 | 78 | 1 | 78 | $25.72[1] | $2006.16 |
| Submission of forms | Non-profit (stranding network) | 13 | Up to 50 per group | 78 | 1 | 78 | $32.23[2] | $2513.94 |
| Fisherman interviews | Small entities (commercial fishermen) | 25 | 1 | 25 | 0.5 | 13 | $25.25[3] | $315.63 |
| **Totals** | | | | **181** | | **169** | | **$4835.73** |

[1] Due to the majority of response coming from private citizens, in this case private boaters, that are not working at the time of report and we have no way of knowing their occupation, as well as the wide variety of respondents in general, we used the mean wage for "all occupations."

[2] Respondents are members of the sea turtle disentanglement network, made up primarily of non-profit conservation groups, we used the mean wage for "conservation scientists."

[3] Respondents are commercial fisherman, so we used the mean wage for "first line supervisors of fishing workers."

**13.** 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).**

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 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 land line. 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 STERF is most often sent via electronic mail. Any shipping costs for STERFs, 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 land line, 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** |

**14. 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.**

The estimated cost to the Federal government will be only in terms of staff hours and supplies. An anticipated 78 reports will be called in to NMFS and each call is expected to last a maximum of one hour. As such, the hourly burden of initial reports to NMFS would be 78 hours. In addition, NMFS 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 39 hours of staff time. In addition, the data will be analyzed periodically in response to requests or to produce annual summaries. The estimated annual burden of these analysis is estimated at 50 hours, including approximately 20 requests per year at about an hour per request, plus time to conduct quality control analyses, and produce data summaries. All of these tasks would be completed by the Sea Turtle Stranding and Disentanglement Coordinator. Therefore, the financial burden to NMFS

would be 116 hours for oversight (5.6% of annual time budget) and 50 hours for data request and quality control (2.4% of annual time budget), for a total of $6,918.64.

NMFS 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, but most often only one or two items is replaced at a time. 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. However, it is estimated that annual equipment costs would less than or equal to $200. NMFS 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.); the annual cost would likely be less than $200.

| Cost Descriptions | Grade/Step | Loaded Salary /Cost | % of Effort | Fringe (if Applicable) | Total Cost to Government |
|---|---|---|---|---|---|
| **Federal Oversight** | ZP 03 01 | $86.483 | 5.6% | | $4843.05 |
| Other Federal Positions | | | | | |
| Analysis of data | ZP 03 01 | $86.483 | 2.4% | | $2075.59 |
| Shipping costs | | | | | $200 |
| Equipment costs | | | | | $200 |
| | | | | | |
| **Other Costs:** | | | | | |
| **TOTAL** | | | | | $7318.64 |
| | | | | | |

## 15. Explain the reasons for any program changes or adjustments reported in ROCIS.

The only change in the information collection is the addition of federal time required to analyze the data obtained from the collection. The time and financial burden to the public has not changed.

| 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 | |
| Telephone reports | 78 | 77 | 78 | 77 | 78 | 77 | Updated estimate of number of reports received increase slightly due to historical averages |
| Submission of forms | 13 | 77 | 78 | 77 | 78 | 77 | |
| Fisherman interviews | 25 | 21 | 25 | 21 | 13 | 11 | |
| **Total for Collection** | **116** | **175** | **181** | **175** | **169** | **165** | |
| **Difference** | -59 | | +6 | | +4 | | |

**16. 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.**

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 that display would be inappropriate.**

The expiration date will be displayed.

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

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320/8(b)(3).

## B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection request does not employ statistical methods.