



Shaping the future for birds

September 2, 2024

Adrienne Thomas
NOAA PRA Officer
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RE: Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Pacific Islands Region Seabird-Fisheries Interaction Recovery Reporting; OMB Control Number 0648-0456

Dear Adrienne,

American Bird Conservancy (ABC) is a nonprofit organization dedicated to conserving wild birds and their habitats throughout the Americas. With an emphasis on achieving results and working in partnership, we take on the greatest problems facing birds today. This include working to conserve seabirds and address the key threats, such as bycatch, that they are facing.

We appreciate the opportunity to provide comments on the Pacific Islands Region Seabird-Fisheries Interaction Recovery Reporting. We want to first affirm that the proposed information collection is necessary. Under the Endangered Species Act (ESA), NMFS is responsible for the protection, conservation, and recovery of listed species, like the Short-tailed Albatross. Continued data collection of Short-tailed Albatross fishery interactions will provide information that can be used to further species recovery.

Additionally, we want to share ways to enhance the quality, utility, and clarity of the information to be collected via the "Short-tailed Albatross Recovery Data Form." First, the "Time" box on the form should be changed to read "Time of Capture." This small edit enhances clarity and improves reporting accuracy.

Another possible improvement to the form could be adding a section describing the vessel's fishing setup. Potential questions in that section could be: Was side setting occurring? Were weights attached? Were tori lines deployed and fully functional? Further descriptive questions—such as: What were the weather conditions? and Describe further bycatch minimization efforts?—could also be included. While an additional section increases the length of the form, the increased data would improve the overall picture of bycatch incidents. For the Short-tailed Albatross this is invaluable information that can help aid recovery.

Beyond changes to the form itself, a critical way to improve reporting would be to translate the form into other languages. Translated forms remove reporting barriers and could improve reporting accuracy. Likewise, expanding offerings of [Pacific Islands Protected Species](#)

[Workshops](#) to crew members on vessels that interact with the Short-tailed Albatross would ensure that the individuals most likely to interact with the species receive adequate training.

The data collected from the Pacific Islands Region Seabird-Fisheries Interaction Recovery Reporting has helped ABC and our partners better understand fishery-seabird interactions. Seabirds are the most threatened bird group and Short-tailed Albatross are a Threatened species. Time spent on reporting is necessary to conserve seabirds and advance sustainable fisheries. However, if there are technologies that can reduce the time requirement and maintain accuracy it makes sense to employ those methods.

Thank you for considering our comments. The conservation of Short-tailed Albatross relies on reducing threats such as bycatch. The Pacific Islands Region Seabird-Fisheries Interaction Recovery Reporting is an important tool that helps address bycatch and advance conservation. Please do not hesitate to contact us to further discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Keitt', is positioned above the typed name.

Brad Keitt
Director, Oceans & Islands Division