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February 13, 2017

Mr. Michael Barnette
Southeast Regional Office
Protected Resources Division
National Marine Fisheries Service
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St. Petersburg, FL 33701-5505
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Re: Comments on Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45

Dear Mr. Barnette,

Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute (collectively “Commenters”) are pleased to provide the National Marine Fisheries Service (“Fisheries Service”) with comments on the proposed rule to withdraw alternative tow time restrictions and require turtle excluder devices (“TED” or “TEDs”) for skimmer trawls, pusher-head trawls, and wing nets (butterfly trawls) (collectively “skimmer trawls”), intended to reduce incidental bycatch and mortality of sea turtles in the southeastern U.S. shrimp fisheries to aid in the protection and recovery of listed sea turtle populations. We support the preferred alternative, Alternative Three, to close the loophole in the existing TED regulations as a necessary and long awaited action to prevent and reduce high levels of take and mortality of protected sea turtle species in the U.S. shrimp fishery which has cumulatively resulted in the deaths of tens of thousands sea turtles since comprehensive TED regulations were promulgated in 1992. Preferred Alternative Three will withdraw the nearly unenforceable and clearly ineffective alternative tow time restriction and require use of TEDs on all shrimp vessels that are currently exempt.¹ We also support the amendment of the definition of “tow times” and refinement of additional

¹ 81 Fed. Reg. 91097, Sea Turtle Conservation; Shrimp Trawling Requirements (Dec. 16, 2016).
Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute Comments on Proposed Rule Re: Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45

portions of the TED requirements as proposed in this alternative to avoid potential confusion.²

For more than a decade the sea turtle conservation and science community has expressed concern about the capture and drowning of small sea turtles, and especially Kemp's ridleys, in skimmer trawls. The proliferation of the skimmer fleet and the difficulty of enforcing TED regulations in the Gulf of Mexico have exacerbated this problem. The finding in the proposed rule that skimmer trawl fisheries cause an estimated 2,118-2,868 sea turtle mortalities per year provides clear evidence that the Fisheries Service must immediately impose new sea turtle protections in these fisheries.³ Closing this loophole in the TED regulations is an obvious and well supported action that is expected to prevent an estimated 1,730-2,500 sea turtle mortalities each year.⁴ We urge you to move quickly to withdraw the ineffective tow time restrictions and implement the proposed TEDs requirement on all skimmer trawls.

In addition to the proposed regulation, we encourage the Fisheries Service to more fully investigate and propose additional measures to reduce incidental bycatch and mortality of sea turtles throughout the southeastern U.S. shrimp fishery. Specifically, we urge the Fisheries Service to immediately initiate a new regulatory process to implement additional sea turtle protections in the entire shrimp fishery and to define and implement enforcement measures to address ongoing compliance deficiencies throughout the shrimp fishery.

The preferred alternative is limited to skimmer trawl gear and does not establish any new reporting, record-keeping, or other compliance requirements beyond the requirement to use TEDs. The Fisheries Service should fully evaluate and propose such additional common sense measures. These comments offer ways to strengthen the proposed regulation, request additional compliance and enforcement measures, and suggest additional cost-benefit analysis.

I. IMPLEMENT A COMPLIANCE AND ENFORCEMENT PLAN TO ENSURE ADEQUATE ENFORCEMENT OF SEA TURTLE PROTECTION MEASURES

We support withdrawal of the alternative tow time restriction in place of a new requirement that all vessels using skimmer trawls, pusher-head trawls, and wing nets (butterfly trawls) employ TEDs. Although the Fisheries Service has expressed concerns that the implementation of this rule will need six months or more to be phased in, we urge the Fisheries Service to immediately adopt and implement the proposed action by no later than April 2017. Gear manufacturers should be encouraged to begin constructing skimmer TEDs now to help meet demand.

Adequate enforcement is needed to insure compliance with federal TED requirements. The Fisheries Service has noted significant compliance issues. The proposed rule, absent measures to address compliance issues, is likely inadequate to address sea turtle mortality. Therefore, Commenters urge that the Fisheries Service propose specific measures to address compliance and enforcement.

² *Id.*

³ 2016 Draft Environmental Impact Statement ("DEIS") at 136.

⁴ 2016 DEIS at 141.

Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute Comments on Proposed Rule Re: Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45

In the 2012 DEIS, the Fisheries Service acknowledged that “[a]dequate enforcement is needed to insure compliance with federal TED requirements,” yet neither the 2012 DEIS, nor the updated 2016 DEIS, explained how adequate enforcement or compliance can be achieved with existing requirements or with the new proposed TED requirements. Because the skimmer trawl fishery has not yet been required to use TEDs, future compliance rates across the skimmer trawl fleet are completely unknown.

The Fisheries Service developed this proposed action and the 2016 DEIS by calculating overall compliance and non-compliance rates in the Gulf of Mexico and the Atlantic otter trawl shrimp fisheries, to serve as a proxy for the skimmer trawl fisheries, assuming TED compliance would be similar between the two gear types. This was based on vessel boarding data from TED inspections. Given the skimmer trawl fishery’s history with lack of compliance with tow time restrictions, making assumptions about compliance with TEDs is speculative at best.

The Fisheries Service’s Office of Law Enforcement (“OLE”) has only 12 special agents and 3 enforcement officers in 7 duty stations (Corpus Christi, Texas; Galveston, Texas; Slidell, Louisiana; Niceville, Florida; Panama City, Florida; St. Petersburg, Florida; and Marathon, Florida) to address all agency enforcement concerns in the Gulf of Mexico region.⁵ As a result, the Fisheries Service relies heavily on U.S. Coast Guard and state law enforcement agency efforts for patrol and monitoring enforcement services.⁶ Inconsistent inspection protocol often has led to fisherman believing they are fishing TEDs properly and were in compliance with the existing regulations when many in fact were not. This shortcoming has led to inaccurate TED compliance statistics regarding compliance generally.

The inadequacy of enforcement efforts was left out of the 2016 DEIS, but is described in detail throughout the 2012 DEIS:

During inspections over the past two years, NMFS documented some fleets were more compliant with TED regulations than others. In some cases, NMFS’ gear experts were hard pressed to find vessels possessing a single fully-compliant TED. For instance, during April 2011 evaluations in Biloxi, Mississippi, NMFS’ gear experts only found 1 vessel out of 14 that was outfitted with completely legal TEDs in its nets (M. Barnette, NMFS, May 2, 2011, memorandum to D. Bernhart, NMFS). While NMFS acknowledges that fishing gear constantly needs mending due to attrition, these findings are extremely troubling. Deficiencies in TED installation were not limited to shrimp vessels, however, as inspections have revealed numerous net shops manufacturing and selling deficient TEDs.⁷

The Fisheries Service also found that:

[O]ver the past two years, it has become apparent that TED inspection efforts by the U.S. Coast Guard and some state enforcement agencies have been sub-

⁵ 2016 DEIS at 132.

⁶ *Id.*

⁷ 2012 DEIS at 6.

optimal. Inconsistent inspection protocol, and in some instances, improper inspection protocol, have led fishermen to believe they possessed adequate TEDs when, in actuality, they were deficient. In some cases, this has led to inaccurate TED compliance statistics that did not reflect true compliance within the fisheries. NMFS is working with its enforcement partners to resolve these issues, and in the interim, is depending on OLE and GMT inspections to determine compliance within the fisheries.⁸ Neither the proposed regulation nor the 2016 DEIS proposes any specific mitigation or monitoring measures to ensure that any level of enforcement or compliance will be achieved in the skimmer trawl fleet. Instead the Fisheries Service refers generally to its inconsistent and inadequate status quo approach, that it will “monitor” the implementation of TEDs requirements in the skimmer trawl fisheries and that there will be regular, ongoing law enforcement activities, as well as supplementary outreach and training efforts.

Without remedies to the overall TED compliance and enforcement issues cited in the DEIS, the proposed regulation for skimmer TEDs and the 2016 DEIS are inadequate to ensure that the skimmer trawl regulation will be adequately implemented to ensure that the reductions in sea turtle mortality are achieved. The Fisheries Service must prepare a detailed plan for public review that describes the level of enforcement it plans to achieve in terms of number of enforcement officers, number of vessels, minimum and maximum enforcement levels by time and area, how it will leverage partner agencies, how it will fill the gap if partner agencies are not available, how to engage additional enforcement such as with observer coverage, trained volunteer patrols, on-board cameras, emergency closures if enforcement is not available or adequate, and other approaches including cessation of shrimping effort as a last resort.

II. STRENGTHEN THE PROPOSED REGULATION

In the event a gear shortage will delay implementation, time and area closures may be necessary to protect sea turtles while the fleet is being equipped. Additionally, Commenters urge the Fisheries Service to strengthen the regulation by establishing time and area closures in the shrimp fishery.

The Fisheries Service must also prepare and implement a detailed enforcement plan that will achieve a 94 percent TED compliance level in skimmer trawls to avoid jeopardizing the existence of protected sea turtle species due to operation of the shrimp fishery. While the otter trawl fleets already achieved 94 percent compliance in 2014,⁹ experience has shown that compliance is highly dependent on enforcement, education, and observer coverage. The Fisheries Service is anticipating 81 percent compliance by the skimmer trawl fishery initially, but expects this number to grow to the same level as seen in the otter trawl fishery.¹⁰ To achieve a 94 percent compliance level, a detailed enforcement plan is necessary.

⁸ 2012 DEIS at 7.

⁹ 2016 DEIS at viii.

¹⁰ 2016 DEIS at 139.

A. The Fisheries Service should conduct a detailed analysis of sea turtle abundance, fishing effort, and stranding patterns to determine hotspots of sea turtle mortality in the fishery.

Given that sea turtle strandings occur due to a variety of reasons, the Fisheries Service should remain dynamic in its management of the shrimp fishery and identify thresholds based on the above factors for emergency closures of sea turtle hot spots.¹¹ Of all commercial fisheries operating in the U.S. Gulf of Mexico and along the east coast of the United States, the shrimp trawling fishery has had the greatest impact on sea turtle populations.¹²

In the Fisheries Service’s 2012 Biological Opinion (“2012 BiOp”), it acknowledged that certain reasonable and prudent measures are necessary and appropriate to minimize impacts of the incidental take of sea turtles. These measures include the need to monitor fishing efforts and strandings. Under the current management system, the Fisheries Service encounters difficulties in determining how many vessels are used for shrimp fishing. For example, the Fisheries Service previously found that the Louisiana trip ticket system may contribute to discrepancies between the number of licenses issued and number of vessels reporting catch/sales, and also found that some dealers report minor landings from multiple vessels in a single record. The Fisheries Service should explore the feasibility of implementing a system that allows it to know exactly how many vessels and nets are trawling and where they are trawling. This will better inform Fisheries Service decision making and could translate into more protective measures for sea turtles, while eliminating any potentially unnecessary restrictions for shrimp trawlers. These measures are vaguely addressed in the terms and conditions of the 2012 BiOp. The Fisheries Service should propose specific measures for addressing this decades-old problem.

B. The Fisheries Service must maintain oversight over the electronic logbook data program.

According to the Southern Shrimp Alliance (“SSA”), the Electronic Logbook (“ELB”) program is a data collection and analysis program that provides a very precise picture of the temporal and spatial distribution of fishing effort in the offshore shrimp fleet, which is then used by the Fisheries Service and the Gulf and South Atlantic Fishery Management Councils for fishery and bycatch management purposes.¹³ The program analyzes fishery-dependent data including catch rates and landings to generate very precise estimates of the time and location of shrimp fishing effort. The data is collected by electronic logbooks installed on roughly 500 selected vessels in the shrimp fleet.

¹¹ The variety of reasons for sea turtle strandings include, but are not limited to, disease, exposure to biotoxins or pollutants, ingestion of marine debris, vessel collisions, extremely cold water temperatures, and fishery interactions – and sea turtle abundance maybe affected by numerous factors and may fluctuate seasonally – prey abundance, chronic, large-scale hypoxia, and water temperature that may alter when sea turtles utilize inshore and coastal waters.

¹² 2016 Biological Opinion at 27.

¹³ Press Release April 2010. <http://shrimppalliance.com/Press%20Releases/4-13-10%20Breaking%20News.pdf>.

Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute Comments on Proposed Rule Re: Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45

The cost of the ELB program has been borne by the federal government since its inception. From 2005-2010 SSA successfully lobbied Congress for a total of \$5.8 million to maintain funding for the program. Consistent with numerous directives from Congress, beginning in FY 2011 and again in FY 2012, the Fisheries Service covered the cost of the program from its own budget. Until recently, the Fisheries Service funded the deployment of non-cellular ELB units on approximately 500 shrimp vessels through an outside contractor. This contract expired on December 31, 2013, and the Fisheries Service then moved to the current cost sharing program.¹⁴ The Fisheries Service has purchased the initial ELB units and will pay for software development, data storage, effort estimation, analysis and archival activities.¹⁵

Currently, the shrimp trawl fishery must then bear the estimated \$200 cost of installation of the ELB, \$20/month for the data transmission, and the estimated \$425 if a broken or damage ELB unit needs to be replaced.¹⁶ If the selected vessel does not comply with any of this, they lose their Gulf of Mexico Shrimp Permit.¹⁷

While we agree with the Fisheries Service's decision to shift these costs to the industry, we urge the Service to maintain oversight of this program. Given the need for improved shrimp fishery data and the economic hardship in the fishery described by the Fisheries Service in the past, we also ask that the Fisheries Service supplement this program's funding where necessary. This will expedite the implementation of the TED requirements and enhance the monitoring of fishing effort in the shrimp fishery.

C. The Fisheries Service should investigate and promptly enact appropriate time and area closures for the fishery to protect important sea turtle habitat and populations.

We maintain the belief that time/area and hot spot closures could provide additional sea turtle conservation benefits. In the 2012 Draft Environmental Impact Statement ("DEIS) on the previously considered skimmer rule, the Fisheries Service considered four time and area closures, but concluded that area and seasonal closures were not practical given the requirements needed to monitor sea turtle abundance. The 2016 DEIS did not further address time/area closures, but instead repeated the findings of the 2012 DEIS.

Closing areas to fishing on a seasonal or periodic basis may introduce significant socio-economic effects to industry and administrative effects. While these consequences may be necessary to achieve particular goals, it does not appear to be a practical solution to address the needed reduction of bycatch and incidental mortality of small sea turtles in the southeastern shrimp fisheries...we believe there are technical solutions that achieve better conservation results, introduce

¹⁴ NOAA ELB Frequently Asked Questions.

<http://www.galvestonlab.sefsc.noaa.gov/ELB/FAQ/index.html>.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*; 50 CFR § 622.51(2).

much less significant socio-economic effects to industry, and are easier to enforce than time/area closures that potentially span multiple jurisdictions.¹⁸

The 2012 DEIS also concluded that identifying habitat hotspots and determining criteria for opening and closing areas would be difficult, and that it would be challenging to convey that information to fisheries that span several states and extend into federal waters.

Time and area closures should have been evaluated again in the 2016 DEIS. Commenters urge the Fisheries Service to more fully evaluate these approaches as they may provide significant benefits to sea turtles and reduce socioeconomic impacts associated with static closures. A dynamic area management pilot project could also be considered as part of one of the alternatives. Just as Texas closes its state waters annually to maintain healthy shrimp stocks, it is possible developing shrimp, as well as sea turtles, may benefit from closures in the coastal waters of other Gulf States.

We urge the Fisheries Service to consider, evaluate, and implement additional measures as follows:

- A. Seasonal closures of federal waters to align with existing state closures.¹⁹ Closing federal and state waters at key times when sea turtle concentrations are highest could provide significant benefits to sea turtles.
- B. The benefits of time and area closures in state and federal waters for vessels using otter trawls and other offshore shrimp vessels using any gear combined with seasonal closures exclusively for the skimmer trawl fleet.
- C. Closures through the month of July. The 2012 DEIS assessed seasonal closures in state waters for March through May only and the 2016 DEIS did not further analyze the benefits of extending the closure. Since peak nesting season for sea turtles in the Gulf typically extends through July, additional benefits could have been recognized if June and July were included in the seasonal closure.

III. FURTHER EVALUATE THE ECONOMIC COSTS AND BENEFITS OF THE PROPOSED ACTION

A. The Fisheries Service should expand the economic analysis to include the benefits of TEDs.

The Fisheries Service estimated the costs of the proposed action across the affected vessels and concluded that its implementation would result in higher fishing costs and lower shrimp revenues. The Fisheries Service stated in the proposed rule that even without the proposed action, a general economic assessment utilizing gross revenue and operating cost information

¹⁸ 2016 DEIS at 25.

¹⁹ Examples are the seasonal closure off Texas, the Tortugas Shrimp Sanctuary, and the shrimp/stone crab seasonally closed zones off Florida. 2016 DEIS at 28.

Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute Comments on Proposed Rule Re: Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45

suggested that the financial conditions for many vessels are and have been poor, and vessels with annual gross revenue averages below \$52,000 had negative net revenues based on 2012 data for non-permitted vessels in the Gulf of Mexico.

If in fact this fleet is operating at a loss while taking a significant environmental toll on protected sea turtles and other marine species, then the Fisheries Service should consider alternative actions including the phasing out of the fishery through buy-outs and other mechanisms to reduce the shrimping effort and lack of profitability. Managing a fishery with a negative bottom line does not benefit the fishery, sea turtles, or the nation at large.

The Fisheries Service should also consider the economic benefits to shrimpers from use of TEDs, including the potential for better fuel efficiency due to exclusion of marine debris and excess weight in the trawl net, and cleaner catch that could potentially achieve higher selling prices and reduce the time needed for sorting and processing shrimp. Moreover, the reduction of finfish bycatch and waste in the shrimp fleet benefits overall marine ecosystems and other fisheries, such as the red snapper fishery.

Increasing effort is therefore likely to be economically risky, particularly for vessels that only or primarily harvest after the openings because CPUEs steadily decline over time and thus the additional revenue from each tow or trip steadily declines as well. Further, if additional effort was cost-effective or profitable, this effort would already be occurring and part of baseline fishing behavior. Therefore, it is not expected that individual vessels and thus the fisheries in the aggregate would or could compensate for lost shrimp and the associated gross revenues by increasing effort.²⁰

The Commenters believe this perception would change if the Fisheries Service considered vessel fuel efficiency due to exclusion of marine debris and excess weight in the trawl net and the time saved from having cleaner catch that does not need to be sorted, untangled, or resuscitated.

Total revenues from all species for the affected fishermen are not known. The total average effect per entity would be reduced if these fishermen also operate in other fisheries, which we expect is the case for most entities. Given the uncertainty, the Fisheries Service should re-evaluate and moderate its statements about the potential economic harm to the fishery from requirements for TEDs.

Lastly, the Fisheries Service should consider the economic benefits of a healthy sea turtle population and marine ecosystem. While the Fisheries Service claimed in the 2012 BiOp that “there is no commercial value associated with sea turtles,”²¹ we urge the Fisheries Service to expand its approach to the value of sea turtle beyond consumption as a commercial fish and beyond focusing solely on the “conservation value” of the sea turtles.

For example, requiring TEDs could benefit local economies by boosting tourism based on sea

²⁰ 2016 DEIS at 186.

²¹ 2012 Biological Opinion at 137.

turtle viewing. TEDs are the most effective method to save turtles and healthy populations of sea turtles can attract eco-tourism to the Gulf Coast and southeastern U.S.

The Fisheries Service should factor in the economic benefits of a healthy ecosystem that allows a shrimp fishery to exist. Given that the fishery is not profitable on its own, the economic value of a sea turtle may actually exceed that of a failing fishery, and the maximum social benefit comes not from allowing the fishery to continue, but in scaling it back or phasing it out. Increasingly, and in support of this recommendation, is mounting evidence of the significant contributions made by sea turtles throughout their lives to marine and coastal ecosystems.

Furthermore, we encourage the agency to fully consider the economic benefits of sea turtle conservation, including especially the tourism benefits of sea turtle protection. The Fisheries Service should consider the directly relevant work of John Loomis on the economic benefits of southern sea otter protection in California (Loomis, John B. (2006) Estimating recreation and existence values of sea otter expansion in California using benefit transfer. *Coastal Management* 34(4):387-404). The beneficiaries to be counted in this analysis include all individuals in the United States who derive value from the knowledge that sea turtles exist and are maintained for future generations. Thus, even if only a relatively small share of the total U.S. population holds passive use values for sea turtles, the total number of beneficiaries is still likely to be large in absolute terms. *See generally* (Loomis, John B. (2000), Vertically summing public good demand curves: An empirical comparison of economic and political jurisdictions. *Land Economics* 76(2): 312-321.). Thus, even small changes in the population of a threatened or endangered species can generate large welfare impacts.

B. The Fisheries Service should work with states to help mitigate the cost of TEDs to the skimmer trawl fleet.

The Fisheries Service describes in detail the estimated costs of requiring TEDs in the skimmer trawl fishery. It describes the shrimp fishery as a shrinking fishery that may experience economic loss with the implementation of the proposed skimmer trawl regulation. The 2016 DEIS or proposed rule do not address funding programs. In the 2012 DEIS, the Fisheries Service cited funding programs that have provided TEDs to the shrimp fleet in the past. For example, the National Fish and Wildlife Foundation (“NFWF”) allocated funds, received from oil recovery income during the Deepwater Horizon oil spill event, and purchased and distributed TEDs to the resident Mississippi skimmer fleet.

Additionally, the SSA submitted a \$10.8 million proposal for Natural Resource Damage Assessment funds on behalf of the shrimp industry at large to provide funding to equip (at no cost to the industry) the entire Gulf shrimp fleet with new TEDs. The project funding would likely be administered either through the states or directly by the Fisheries Service. At a Gulf Council meeting, Gulf States Marine Fisheries Commission Executive Director Larry Simpson championed a motion before the Gulf Council to send a letter to the Fisheries Service strongly endorsing the SSA funding proposal. The motion was adopted with the unanimous support of the Council.

While we do not advocate for the Fisheries Service to provide TEDs to the skimmer trawl fleet at the agency's own expense, the Fisheries Service is in a position to help the industry secure outside funding to supplement the industry's own funds, as needed. We ask the Fisheries Service to take a proactive role in exploring funding mechanisms to provide TEDs to the skimmer trawl fleet to ensure compliance and to reduce economic impacts.

CONCLUSION

Swift and immediate action by the Fisheries Service is necessary to protect endangered and threatened sea turtles from capture, injury and death in the U.S. shrimp fishery. Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute support the Fisheries Service withdrawing the alternative tow time restriction and requiring that all vessels using skimmer trawls, pusher-head trawls, and wing nets (butterfly trawls) employ TEDs. However, we remain concerned that this protective measure will be under-effective without specific enforcement measures to ensure compliance. We urge that the Fisheries Service develop a clear and accountable enforcement plan to ensure that the skimmer trawl TED regulation is implemented adequately. Finally, we also encourage the Fisheries Service to again review the feasibility and benefits of time/area and hot spot closures as they may provide additional protective measures.

Thank you for reviewing our comments and please do not hesitate to contact us with any questions or concerns about these comments.

Sincerely,

/s/Jaclyn Lopez

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/s/Todd Steiner

Todd Steiner, Executive Director
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Center for Biological Diversity, Turtle Island Restoration Network, Defenders of Wildlife, The Humane Society of the United States, Sea Turtle Conservancy, and Animal Welfare Institute Comments on Proposed Rule Re: Sea Turtle Conservation; Shrimp Trawling Requirements, 0648-BG45