

SUPPORTING STATEMENT
Shore-based Recreational Angler Survey of Sea Turtle Interactions
OMB CONTROL NO. 0648-XXXX

A. JUSTIFICATION

This request is for a new information collection

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

The National Marine Fisheries Service (NOAA Fisheries) of the National Oceanic and Atmospheric Administration, United States Department of Commerce is planning to implement a survey design, and directly assess the extent of and factors surrounding interactions between pier and other shore-based recreational anglers and sea turtles. Each year the Sea Turtle Stranding and Salvage Network (STSSN) documents incidentally captured sea turtles at recreational piers along the Gulf of Mexico and Atlantic Coasts. However, these reports are opportunistic and likely only represent a portion of the hook and line interactions that are occurring, and the STSSN does not collect information related to fishing practices that may influence the likelihood of capture. This collection is necessary to obtain information specifically about recreational piers and other shore based structures, the anglers that fish on piers (defined here to include piers and other shore-based structures), the nature of interactions between pier-based anglers and sea turtles, as well as to determine specific factors that may influence the rate of interactions. NMFS can use this information to evaluate the impact this sector has on sea turtle populations and determine management measures (voluntary or required) that can be implemented to reduce interactions.

Collection of these data on sea turtle interactions in the shore-based recreational fishing sector is necessary to fulfill statutory requirements of the [Endangered Species Act](#) (16 U.S.C. 1531 *et. seq.*) Section 7 analyses, inform management decisions, and will provide necessary data for the conservation and recovery of endangered and threatened sea turtle populations.

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

The sea turtle interaction data that will be collected via this survey collection will be used by NOAA Fisheries protected species managers to evaluate the impacts of recreational fishing on sea turtle populations, and in determining co-factors contributing to shore-based recreational bycatch with an end goal of understanding if changes to fishing practices can be implemented to reduce bycatch. The survey will be administered in a maximum of 5 states (Atlantic and Gulf of Mexico). The number of states and the number of surveys completed in each state will be funding dependent.

The collection “Recreational Angler Survey of Sea Turtle Interactions” has 4 survey forms included within it.

Form 1: Fishing Site Characterization Form

Form 2: Survey Cover Sheet

Form 3: Angler Intercept Survey

Form 4: Sea Turtle Incidental Capture Intake Form

Form 1: Fishing Site Characterization Form:

This form would be completed by survey administrators throughout the Atlantic and Gulf of Mexico coasts. The intention is for this form to be filled out one time only for each pier that is included within the survey. The purpose of the form will be to collect specific information on the structure and operation of the pier, including the length and shape of the pier, staffing, signage, depth of water, lighting, and other features.

Form 2: Survey Cover Sheet:

This form would be completed by survey administrators throughout the Atlantic and Gulf of Mexico coasts. This form would be filled out at each site visited for each observation/survey session. It provides general information on the environmental conditions for that particular day, the number of anglers fishing, number of lines in the water, and the number of surveys completed for that site.

Form 3: Angler Intercept Survey:

This form would be verbally administered to anglers fishing during the survey period. The form is broken into three parts. The first part asks about angler fishing practices that day, including, bait and gear type, length of time fishing, target catch and other fishing habits. Part 2 asks for information on if the angler has observed sea turtles in the past, while fishing at that particular site. Part 3 asks for information about the most recent sea turtle capture, if applicable. This section asks information on the nature of the interactions -- if the turtle was hooked and/or entangled, where on the body it was hooked, if the hook and line were removed, how much line was remaining on the turtle, and if it was released alive or dead. All of this information will be used by NOAA Fisheries protected species managers to better understand the factors (e.g. hook type, bait type, time of day) that may influence the rate of interactions between sea turtles and recreational fishing gear. The data collected will also allow us to understand the baseline number of interactions that occur.

Form 4: Incidental Capture Intake Form

This form will be filled out by a Sea Turtle Stranding and Salvage Network participant when a turtle is incidentally captured, regardless of if the capture occurs during a specific survey period, and collects information on the specific interaction, including time of day, bait type, hook type, how and where on its body the animals was hooked or entangled. This information is necessary to compare to the angler survey data, to identify if certain factors or fishing practices influence the rate of interactions.

Additionally, instructions and survey design guidance is included within the collection to

assist with standardized data collection.

Analysis of the data collected from this survey will be used in agency documents, such as ESA Section 7 Biological Opinions and other regulatory documents. These documents are disseminated to the public, but the raw survey results will not be disseminated to the public. NOAA Fisheries will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to 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. Although the information collected will not be disseminated directly to the public, the results will be used in scientific, management, and regulatory documents. Should NOAA Fisheries decide to disseminate the information, it will be subject to the quality control measures and pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

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

The angler survey will be completed using verbal responses from the public. The survey administrators will fill out the forms. In some cases, the forms may be filled out electronically on-site through use of a laptop or tablet, but again, the survey administrator will fill out the form based on the verbal answers. This survey is designed so that each respondent only needs to complete the survey one time. Since the survey will be completed in person there is no need for the survey participants to print, mail, or electronically submit any portion of this survey.

4. Describe efforts to identify duplication.

We are not aware of any other wide-scale efforts to systematically collect data on sea turtle interactions with the pier/shore-based recreational fishing sector along the Atlantic and Gulf of Mexico coasts. The public reports hook and line interactions to the Sea Turtle Stranding and Salvage Network (STSSN). The percentage of interactions that are reported is unknown. The STSSN then responds to the event. The STSSN collects data on the animal morphometrics, injuries, and many record details on the gear found on the animal, but the STSSN does not collect detailed information on the angler practices that were employed at the time of capture, or detailed information on the fishing activity at the pier. Form #4 would be provided to the STSSN to standardize the information the STSSN collects on incidentally captured turtles, and it intended to compliment the data collected through the Angler Survey, to allow NOAA to better determine co-factors influencing bycatch. Individual Sea Turtle Stranding and Salvage Network facilities have conducted small-scale surveys of their specific response area to gather information on pier interactions, but these efforts have been disjointed and specific to their particular need. NOAA Fisheries is currently operating the Access-Point Angler Intercept Survey (APAIS) in the Southeast Atlantic and Gulf of Mexico, OMB Control Number 0648-0659; however this survey only collects information on the fishing experience, including the fishing gear used and the target catch, not on interactions with sea turtles.

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

No small businesses will be impacted by this collection. The survey will target only individuals who recreationally fish on piers.

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

Failure to conduct this collection will cause a continued shortfall of data regarding the interactions between sea turtles and pier/shore-based recreational anglers. These data are critical to meet NOAA Fisheries mandates under the ESA to monitor and reduce the bycatch of sea turtles. Failure to implement the data collection will delay the Agency's effort to develop and implement the ESA Section 7 program, as well as to develop management measures to reduce bycatch in this sector.

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

The collection is consistent with OMB guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on July 18, 2017 (82 FR 32790) solicited public comment on this collection. No comments were received.

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

This data collection will not include any incentives to prospective respondents.

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

Participation in this survey is voluntary. The information collected will be protected and kept anonymous if released.

11. Provide additional justification for any questions of a sensitive nature, such as sexual

behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are asked.

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

This collection of forms would will be completed by approximately 10,000 public respondents, approximately 10 Sea Turtle Stranding and Salvage Network (STSSN) participants, and by 10 survey administrators, resulting in a total estimated burden of 1781hours. Surveys may occur simultaneously in several states in the U.S. Atlantic and Gulf of Mexico, but the survey collection protocol would be conducted only one time per state. Two forms would be filled out solely by the survey administrator; Form 1 (pier characteristics) and Form 2 (survey cover sheet). Form 3 would be filled out by the survey administrator who will record the voluntary verbal responses from members of the public, and Form 4, (Sea Turtle Incidental Capture Intake Form), will be filled out solely by the STSSN participants. Form #4 is independent of the angler survey in that it will not be filled out during regular survey periods, but rather it will be filled out by the STSSN when a take occurs and is reported to the STSSN. Given low numbers of incidental captures (generally less than 50 reported per state per year), the STSSN will fill out form #4 throughout the 3-year PRA approval period whenever they respond to a shore-based incidental capture, to allow for sufficient data collection on actual interactions. Form 4 collects information on the fishing practices (e.g., bait, hook type) that were employed during the capture. This information is not currently captured by the STSSN. The data collected on actual capture events will be compared qualitatively to the angler survey data on generalized fishing practices to determine co-factors relating to bycatch.

The expected number of respondents (200 surveys/site with 10 sites/state) is based on pier-based intercept surveys on sea turtle interactions that were conducted by private organizations in both Virginia and Mississippi.

We intend to implement the survey in a maximum of 5 states during the survey approval period, with each state completing one survey “year” only. For each state, the intention would be to survey a maximum of 10 popular fishing sites, and intercepting up to 200 individual anglers at each site.

Form 1: Fishing Site Characterization Form (survey administrators - 9 hours over 3 years, accounted for in Q14.). *This is posted as a supplementary document.*

Completed one time per site.

Assuming 10 sites per state, and 5 states total, this form would be filled out a total of 50 times. 10 minutes for each form.

10 sites x 5 states = 50 sites total = 50 site characterization forms

50 x 10 minutes = 500 minutes / (60 minutes/hr) = 9 hours (annualized to 3 hours per year)

Form 2: Survey Cover Sheet (survey administrators - 42 hours over 3 years, accounted for in Q14). *This is posted as a supplementary document.*
Completed one time per site visit. 5 minutes for each form.

Assuming 10 sites per state (5 states) and 200 angler surveys per site. We estimate that approximately 20 angler surveys can be completed during each site visit, resulting in approximately 10 site visits per site (200 surveys / 20 angler surveys per visit = 10 site visits).

10 sites x 200 angler surveys = 2000 angler surveys
2000 angler surveys / 20 angler surveys per site visit = 100 site visits per state
100 site visits per state x 5 states = 500 site visits = 500 cover sheets
500 cover sheet x 5 minutes = 2500 minutes
2500 minutes / (60 minutes/hr) = 42 hours (annualized to 14 hours per year)

Form 3: Angler Intercept Survey (public - 1667 hours over 3 years)

To be completed for each angler intercept survey. 10 minutes per form.
Assuming 10 sites per state (5 states), and 200 angler surveys per site.

10 sites x 200 surveys = 2000 total angler surveys per state
2000 surveys x 5 states = 10,000 total surveys over the 3-year period
10,000 x 10 minutes = 100,000 minutes / (60 minutes/hr) = 1667 hours (annualized to 556 hours per year)

Form 4: Sea Turtle Incidental Capture Intake Form (STSSN local participant - 63 hours over 3 years)

Dependent on the number of incidental captures that are reported to the stranding network. Completed each year for 3 years per 5 states. This form would be completed for each IC event. 5 minutes for each form.

We are assuming 50 incidental captures (ICs) per year per state. This is a high estimate for most states. We propose allowing the STSSN for each of the 5 states to fill out this survey for 3 years to maximize the potential data collection.

50 ICs per year per state x 3 years = 150 ICs per state
150 ICs x 5 states = 750 ICs total
750 forms x 5 minutes = 3750 minutes / (60 minutes/hr) = 63 hours (annualized to 21 hours).

Total annualized burden to the public, based solely on Form 3: 3,333 respondents and responses per year, and 556 hours per year.

An hourly rate of \$25.20 is based on the average for all civilian workers from the National Compensation Survey (preliminary, October 2015; <http://data.bls.gov/cgi-bin/surveymost>). There

are no other costs to respondent. A total of 556 annual burden hours are anticipated, resulting in a labor cost to respondents of approximately \$14,012 per year.

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

These data collections will incur no cost burden on respondents beyond the costs of response time.

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

As mentioned above, the implementation of this survey is funding dependent. NOAA is currently looking at external funding options for implementation, such as through the Deepwater Horizon (DWH) Oil Spill Settlement, and Restoration Planning which is currently underway. NOAA has proposed a survey project in 4 states (with implementation in up to 4 states). If accepted the survey would be implemented with at no additional cost to the government. Any Federal costs would be reimbursable through DWH Restoration.

If surveys are implemented outside the DWH Restoration program, NOAA would minimize costs where possible and partner with local organizations that may be able to cost share for the implementation.

Assuming no reimbursable funding, the Federal cost per state would be the hiring of 2 survey administrators per state. Survey administrators would be part-time contractors that together would be the equivalent of one full time contractor. Therefore, the cost of implementation of this survey would be approximately one full time contractor per state. Estimate at \$40,000 per state.

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

This is a new program.

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

NOAA does not plan to publish the results of this study, although the data will be used to develop agency documents.

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

N/A.

18. Explain each exception to the certification statement.

N/A.