

**SUPPORTING STATEMENT  
SURVEY OF CHARTER BOAT AND HEAD BOAT ANGLER INTERACTIONS WITH  
SEA TURTLES  
OMB CONTROL NO. 0648-XXXX**

**A. JUSTIFICATION**

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

The National Marine Fisheries Service (NMFS) of the National Oceanic and Atmospheric Administration (NOAA), United States Department of Commerce (DOC) is planning to test a survey design, and directly assess the extent of interactions between charter boat and head boat recreational anglers and sea turtles. This survey will be conducted in North Carolina. North Carolina was chosen as the pilot location for several reasons. First, sea turtles are known to inhabit the coastal and inshore waters of North Carolina seasonally and anecdotal reports indicate that sea turtle interactions have occurred in the charter boat and head boat industry in North Carolina. Second, North Carolina is a state participating in the 2013 Access-Point Angler Intercept Survey (APAIS), OMB Control No. 0648-0659, which will provide the baseline for the survey participants. Finally, North Carolina was chosen due to the success of implementing the 2012 pilot survey, as part of OMB Control No. 0648-0052, which collected data on interactions between shore and private-boat recreational anglers and sea turtles in North Carolina with the Division of Marine Fisheries.

As mentioned above, the 2012 pilot study tested the feasibility of collecting data on interactions between shore and private-boat recreational anglers and sea turtles. This previous survey was conducted using a dual frame mail and phone survey design that sampled from state databases of licensed anglers and either residential address frames (address-based sampling or ABS) or random digit dial (RDD) household frames. While the previous survey was successful in collecting data from this sector, it did not account for interactions that may have occurred within the charter boat and head boat segment of the recreational fishing industry. Therefore, this collection is necessary to obtain information specifically on the rate of interactions between charter boat and head boat anglers and sea turtles so that NMFS can evaluate the impact this sector has on sea turtle populations. The survey will also assess the feasibility of the mail survey design, based on response rates, to determine if this is a productive method of data collection.

Collection of these data on sea turtle interactions in the recreational charter boat and head boat sectors is necessary to fulfill statutory requirements of the [Endangered Species Act](#) (16 U.S.C. 1531 *et. seq.*) Section 7 analysis, and will provide necessary data to evaluate impacts on the 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 are collected via this collection will be used by NOAA Fisheries protected species managers to evaluate the impact of recreational fishing on sea turtle populations. The instrument has three parts. Part I of the survey asks about interactions that have occurred within a specific 2-month period. The two-month period will vary depending on when the person was originally intercepted on their charter boat or head boat fishing trip (see below for intercept process). For example, if the angler was intercepted in May or June 2013, the survey would be mailed out in approximately August 2013, and we will specifically ask about any interactions that occurred in May and June 2013. If the angler is intercepted in July or August 2013, we will specifically ask about the interactions that occurred in those months. In Part I, we ask for the total number of charter or head boat trips taken during the specific 2-month period, the number of interactions that occurred, what type of turtle was involved (either leatherback or hard-shelled turtle based on an identification guide that we provide with the survey), and several questions on the nature of the interactions. To collect information on the nature of the interactions we ask 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 estimate the total number of sea turtle interactions that occur in the charter/head boat sector, and the potential impact of those interactions on individual turtles as well as sea turtle populations.

Part II of the survey asks about interactions that have occurred within the 12-month period prior to (but not including) Part I. In this section we ask for the total number of charter boat or head boat trips they have taken during the 12 month period, the number of sea turtle interactions that occurred during that time, as well as information on the type of turtle (hard-shelled or leatherback), in what month the interaction occurred, and any details they can recall about the interaction. This information will be used by NOAA Fisheries protected species managers to estimate the number of sea turtle interactions by the charter/head boat sector during the 12 month period, and determine what impact this may have had on individual sea turtles as well as sea turtle populations.

Part III of the survey asks about any recreational fishing interactions the angler has had in their lifetime, in addition to anything previously reported in Part I and II. This information will be used by NOAA Fisheries protected species managers to determine the magnitude of interactions that occur in recreational fishing sectors and specific information on the number of interactions individual anglers have had over their lifetime.

Analysis of 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 surveys will be conducted by mail. Survey responses for mail surveys will be automatically captured through optical character recognition (OCR), which will greatly increase the accuracy and efficiency of data collection.

All respondents will fill out paper forms which will be returned in postage paid envelopes. Electronic submission was considered as an option for collecting data in this survey; however, it was determined that one submission method would be preferred for this survey size. The mail survey data collection procedures have been extensively tested through previous Marine Recreation Information Program (MRIP) pilot studies (Andrews et al. 2010, Brick et al. 2012). The pilot surveys were administered for eight independent, two-month reference waves. The initial mailing is delivered by regular first class mail and includes a cover letter stating the purpose of the survey, a survey questionnaire, and a post-paid return envelope.

Additionally, based on survey response rates from the dual-frame phone and mail survey of private boaters discussed above, under OMB Control Number 0648-0052, it was found that while both phone and mail-based methods produced usable data, the mail surveys had a better response rate. Brick et al. 2012 also found that mail surveys to registered anglers had a higher response rate than other methods. This survey will involve anglers who were intercepted in the 2013 Access-Point Angler Intercept Survey (APAIS) in North Carolina, OMB Control Number 0648-0659, and who will be expecting the follow-up survey, and therefore we have selected mail, addressed directly to the individual angler, as the most efficient and cost effective method to reach all individuals targeted by this survey is through a mail survey.

**4. Describe efforts to identify duplication.**

We are not aware of any other efforts to estimate interactions between sea turtles and the charter boat and head boat fishing sectors in the state of North Carolina or other states. Any existing surveys on interactions between sea turtles and recreational fishing gear would be coordinated through the NMFS Office of Protected Resources, or the regional Protected Resources Divisions, and we have not been notified or involved in other efforts. NMFS and the North Carolina Division of Marine Fisheries are currently operating the 2013 Access-Point Angler Intercept

Survey (APAIS) in North Carolina, 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.

The anglers who complete APAIS in North Carolina will be asked if they would be willing to complete a follow-up mail survey. Individuals who agree to complete the survey will be mailed a survey form; therefore, no duplication is possible.

**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 participate in the charter boat and head boat recreational sector as passengers. Vessel owners and captains will not be surveyed.

**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 shortfall of data regarding the interactions between sea turtles and charter boat and head boat 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.

**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 March 7, 2013 (78 FR 14775) solicited public comment on this collection.

One substantive comment was received on the collection from The Ocean Conservancy. The commenter is supportive of the information collection proposed and felt that the information gathered through this collection will be essential to the proper performance of agency functions and integral to increased understanding of the issue. The commenter added that the survey is concise and should not place much burden on the respondents, although he recommended considering allowing participants to respond via internet. In response to this comment, we

considered the possibility of allowing for electronic submission, but given the small survey size (approximately 1990 responses); we felt that a paper mail survey would be most appropriate for this survey type and budget. The commenter also provided several constructive comments on the draft survey questions, including:

- 1) (Regarding survey question 3) The commenter suggested that we specifically ask the number of interactions reported by interaction type (hooking, entanglement or observe). In response to this comment we added more specificity into Part I of the survey, so that we could better determine the specific nature of each interaction.
- 2) (Regarding survey question 4f). The commenter questioned whether the anglers were qualified to determine the fate (alive or dead) of the released turtle, and suggested that qualifiers be added to the survey such as “did you observe the turtle swim away and dive”. Additionally the commenter questions the reliability of the answers if fisherman was reluctant to report an interaction that may have caused a sea turtle mortality. After consideration, we decided to leave question 4f in the survey, with the understanding that the results may be impacted by angler knowledge. We understand that fisherman may be reluctant to provide information on interactions with dead sea turtles; therefore, we have ensured that the document states participation is voluntary and answers will be kept confidential.
- 3) (Regarding Part I and Part II): The commenter suggested linking the response periods to the waves of the ongoing MRIP surveys by asking for information on specific 12 month and 2 month periods of time. We have incorporated this suggestion into the final survey design, and have adjusted the periods of time where information is requested. Part I was originally asking about the most recent fishing trip, but is now asking about fishing trips taken during a 2 month period. Part II asks for information during a 12 month period of time.

Our responses and subsequent changes to the survey questions have been communicated to the commenter via email.

No comments specifically addressed estimated costs and burden hours.

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

No incentive will be provided. We considered providing a \$1 or \$5 incentive to respondents, but funding did not allow for this activity.

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

As stated on the instruments, responses are kept confidential as required by [NOAA Administrative Order 216-100](#), Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form without identification as to its source. Data such as personal addresses and phone numbers will remain confidential.

**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.**

**The total burden for this collection will be 365 hours.**

- A) A total of 4,000 individuals are expected to be encountered during the APAIS survey. After the APAIS survey is completed, a separate question will be asked to determine if the angler is interested in completing a follow-up mail survey on sea turtle interactions. It is estimated that 4000 individuals will be asked this question, and approximately 2,000 will agree to the follow-up survey. If the individual agrees to complete the follow up survey, their name and address will be collected. It is estimated that this process will take an average of 30 seconds to complete for 4000 anglers, resulting in approximately 33 additional burden hours for this survey ( $4000 \times 30 \text{ seconds} = 2000 \text{ minutes}/60 \text{ minutes} = 33.33 \text{ (33) hours}$ ).
  
- B) No more than 1,990 individuals will be mailed the follow-up survey due to the allocated budget for this project. Once 1,990 individuals have agreed to complete the follow-up survey, we will discontinue the effort to collect names and addresses, as we will have fulfilled our maximum sample size. If during the APAIS collection period, fewer than 1990 individuals agree to complete the follow-up survey, our sample size will decrease to correspond with the exact number of individuals (less than 1,990) who agreed to complete the follow-up survey. However, we anticipate that the APAIS effort will provide us with the full sample size of 1990 individuals. It is estimated that the survey response will take an average of 10 minutes. Each respondent will provide one response only; therefore the total burden is 332 hours ( $1,990 \times 10 \text{ minutes} = 19,900 \text{ minutes}/60 = 331.66 \text{ (332) hours}$ ).

Respondents: 4,000 unduplicated: 4,000 APAIS respondents including the 1,990 sea turtle survey respondents

Responses:  $4,000 + 1,990 = 5,990$

Hours:  $33 + 332 = 365$ .

**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. The mailed surveys included postage-paid return envelopes.

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

Annual cost to the Federal government is approximately \$60,000, which is the cost of the contract necessary for survey materials and mailing costs, as well as the staff necessary to execute the survey, including developing the survey questions, mailing the surveys and receive the results.

**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.**

Not Applicable.

**18. Explain each exception to the certification statement.**

Not Applicable.

B.