

**SUPPORTING STATEMENT**  
**GATHERING OBSERVATIONAL DATA ON HISTORICAL AND CURRENT**  
**BIOLOGICAL TRENDS AMONG POPULATIONS OF ALEWIFE (*ALOSA***  
***PSEUDOHARENGUS*) AND BLUEBACK HERRING (*A. AESTIVALIS*)**  
**OMB CONTROL NO. 0648-XXXX**

**A. JUSTIFICATION**

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

In 2013, the National Marine Fisheries Service (NMFS) completed a comprehensive review of the status of river herring (alewife and blueback herring) in response to a petition submitted by the Natural Resources Defense Council requesting that we (NMFS) list alewife (*Alosa pseudoharengus*) and blueback herring (*Alosa aestivalis*) as threatened under the Endangered Species Act (ESA) throughout all or a significant portion of their range, or as specific distinct population segments. Based on the best available information at the time, in August 2013 we determined that listing alewife or blueback as threatened or endangered under the ESA was not warranted. At that time we also acknowledged that both species are at low abundances compared to historical levels and that continued and improved monitoring of both species is needed. We agreed with the Status Review Team that there are significant data deficiencies for both species and there is uncertainty associated with the available data. For these reasons we committed to re-assessing the status of both species within the next 5 years.

We recognize that commercial, recreational, and sustenance fishermen have detailed local knowledge of river herring and that this knowledge can help address some of the data gaps identified in the listing determination. In order to have the most complete understanding of river herring before making future ESA listing decisions, it will be necessary to document and analyze fishermen's observations in a comprehensive way. For this reason we intend to contact commercial, recreational, and personal use/sustenance river herring harvesters to inquire about recent and long-term observations of changes in run-timing, abundance, distribution, fish size, species composition, as well as perceptions of the greatest threats to these species.

**2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 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.**

This will be a one-time survey that will take place from August through November of 2014. Phone interviews will be conducted by NMFS and contractors working on behalf of the Agency for the purposes of documenting fishermen's observations of changes in in run-timing, abundance, distribution, individual fish size, and species composition, as well as fishermen's perceptions of the greatest threats to these species and how to best address those threats. We are seeking to document fishermen's observations from Maine to North Carolina in order to help assess range-wide trends and threats.

We recognize that, generally speaking, commercial fishermen will be better able to describe the changes we are interested in documenting because they, for the most part, likely put more effort

in the fishery as compared to recreational or personal use fishermen. However, we know that in many states (e.g. New Hampshire, Massachusetts, Connecticut, and New York) recreational fishing made up a large portion of river herring landings over the past decade (personal communication with Robert Eckert, New Hampshire Fish and Game; Steve Gephart, Connecticut Department of Energy and Environmental Protection; Kathy Hattala, New York Department of Environmental Conservation; Doug Kalweit, Town of Barnstable Department of Natural Resources; Mike Stangle, Delaware Department of Fish and Wildlife). It is not possible to identify who fished recreationally and who fished commercially in certain areas based on license lists alone. For example, the state of New York and the town of Barnstable, Massachusetts (and likely other towns in Massachusetts as well) issued licenses for river herring that applied to both commercial and recreational fishermen. It is impossible to separate these license lists into commercial and recreational components. The first question in our survey asks respondents to identify themselves as commercial, recreational, personal uses/sustenance, or another type of harvester. When analyzing survey responses we will consider each of the categories of harvester separately in order to assess differences in their answers and to address the different amounts of time and effort that commercial fishermen put into the fishery as compared to non-commercial fishermen.

Questions 2-8 of the survey instrument are designed to collect information about where, when, how, and for which species (alewives, bluebacks, or both) the respondent fished. This information will help to put the answers to the other questions in context and will allow us to look for effects of gear type, habitat type, and time frame on participants' answers to questions about changes in their local river herring runs.

Question 9 asks whether or not and how the respondent distinguishes between alewives and bluebacks. Not all fishermen distinguish between the two. This information will help us identify who is able to notice trends on a species-specific basis, rather than for the two species collectively.

Questions 10-14 of the survey are directed at identifying the fishermen's observations of run timing, abundance, distribution and fish condition. These represent key range-wide data gaps for these species and are essential pieces of information in terms of monitoring their populations.

Question 15 aims to identify the fishermen's perspective of the health of river herring populations.

Questions 16-18 address fishermen's perspectives of the threats to river herring and the best ways to restore river herring populations. NMFS wants to restore river herring populations throughout their range and fishermen's perspectives on local threats can help NMFS identify priorities for restoration.

Question 19 asks if the respondent has anything additional to tell us about river herring. This will allow participants to share insights that may be useful for NMFS to know about but that are not addressed by the other survey questions.

Question 20 asks for recommendations of organizations that may be able to help us identify other harvesters call as part of this survey. This will help us expand our call list and will be especially useful for finding harvesters whose phone numbers may have changed since they last bought a

fishing license, who were not required to purchase a license, or who fished in states that were unable to give us contact information for license holders. We will not ask survey respondents to provide contact information for other harvesters in order to avoid potential privacy issues.

The final questions ask for the email or mailing address of participants so that we may share the final report on the survey with them.

The question list was designed to help NMFS collect information related to key data gaps on river herring. Information from this survey may be used to help inform decisions related to future status reviews, though only in conjunction with other scientific data. Given the limited available data on river herring, the information gathered from this survey will be used as a means to validate whether data gathered by scientists and managers is consistent with the observations of the fishing community. Monitoring and scientific data collection on river herring have been limited to a select few rivers and streams throughout the species range and the methods of collecting the data have been inconsistent between states. Commercial, recreational, and sustenance fishing effort are (or, in some states, were) spatially and temporally much more wide spread and cover a greater duration of the run than what is being sampled by scientists. Fishermen's knowledge can therefore be very useful to help fill data gaps and identify future research needs and potential future management actions.

NMFS 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 is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NMFS 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.**

NMFS will initiate contact with potential survey respondents by telephone. At that time, the interviewer will either schedule a time to conduct the survey, or if convenient for the interviewee, conduct the survey over the telephone. The interviews will be recorded with sound recording software if the interviewee gives his or her permission to do so. If the interviewee does not want the conversation to be recorded, the interviewer will take notes instead. Upon request, respondents will be mailed a paper version of the survey with a postage-paid envelope to complete and return; however, we will highly encourage all respondents to answer the survey questions over the phone to avoid any confounding effects that differences in survey implementation may have on responses.

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

We are aware of two somewhat similar efforts. In the spring of 2014 Maine Sea Grant collaborated with NMFS to interview four river herring fishermen in Downeast Maine as part of a small oral history project (for more details see <http://www.seagrant.umaine.edu/oral-histories-alewife-eel>). The question list for the oral history project was very similar to what is proposed for the phone survey. Participants were informed that they may be contacted in the future to participate in the phone survey. Another similar interview effort was carried out by the Alewife Harvesters of Maine (AHM) in 2013. This effort focused on the goals and vision of the organization, but also asked some similar questions to what we are proposing (e.g. what are the greatest threats to river herring populations?). The intent of the AHM survey was quite different from the intent of this survey. We have included language in the survey's introductory script to explain to participants from Maine that this survey may feel redundant with the Alewife Harvesters of Maine survey, but is different in scope and intent.

In early 2014, NMFS and the Atlantic States Marine Fisheries Commission began to assemble a river herring Technical Expert Working Group (TEWG). We have reached out to the TEWG to explain the intent of the survey and have asked for feedback and support for this effort. No one has notified us of similar survey efforts.

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

The survey will target commercial, recreational, and personal use/sustenance harvesters of river herring. We are uncertain of the percentage of the commercial fishermen who would be classified as a small business, but the amount of burden would be minimal. The total time to schedule the interview is expected to take between five and ten minutes to accommodate introductory statements and the time to conduct the interview is expected to be approximately 15 minutes unless the interviewees have additional statements or questions of their own. Individuals have no obligation to participate in the survey if they are not interested.

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

This survey is needed to accurately represent the best available data in respect to population and biological trends of river herring. Alewives and bluebacks are data poor species and are currently considered to be "species of concern". NMFS has committed to re-assessing their status under the Endangered Species Act within the next five years. The amount of scientific data on these species that is currently collected in a consistent manner is very limited. Fishermen have valuable knowledge that can help us address major data-gaps related to these species. If we do not proactively and comprehensively document fishermen's knowledge, we risk leaving data-gaps unfilled and making future management decisions based on an incomplete understanding of these species.

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

Not Applicable.



**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 25, 2014 (73 FR 16300) solicited public comments.

One comment was received expressing support of this effort and recognizing the importance of this information in respect to its ability to inform the management of river herring.

We appreciate the support of this effort and we will collaborate with the fishery management councils and the TEWG to provide them information from this effort that will be useful in their efforts to manage these species.

We have reached out to various NOAA staff, state biologists and managers, and academic researchers who work with river herring to solicit feedback on the methodology of this survey. We received helpful feedback that we used to craft our proposed survey methodology.

We ran a test-run of the survey with four commercial river herring fishermen from Maine. They provided very helpful comments that were used to update the introductory survey script and the question list. After the survey script and question list were updated we surveyed two additional harvesters from other states. The survey went smoothly with them and we feel confident that we have developed a comprehensible and effective survey implement.

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

Not Applicable.

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

The survey results are intended for internal use by NMFS to better understand biological trends within river herring populations, and the survey information will be kept separate from the respondents name and contact information. However, there are no assurances of confidentiality, and this will be explained to each interviewee prior to the interview being conducted, and will be part of the interview script.

**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.**

Not Applicable.

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

The number of interviews we intend to conduct will not exceed 500. The amount of time to schedule the interviews with each respondent is not expected to exceed 10 minutes, and the amount of time to conduct each interview will be approximately 15 minutes. The maximum anticipated time to schedule interviews will not exceed 83 hours, and the maximum anticipated time to conduct the interviews will not likely exceed 125 hours. The total maximum burden of participating in the surveys will not exceed 208 hours.

**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).**

There will be no burden to the respondents outside of the time to participate in the interview. Those choosing to complete paper surveys will receive them in postage-paid envelopes.

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

We anticipate an estimated 150 hours for survey development and preparation; 215 hours will be needed to conduct the surveys; and 260 hours to do the analysis and write up the results. The estimated total time to fully implement the project is 625 hours, with an estimated total cost to the Federal government of \$23,000.00: 150 hours at the GS-12 level and 15 hours at the GS-14, with a subtotal of \$6,150; the rest are contractor costs.

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

This is a new information collection.

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

Individual survey records will not be published. There will be internal documentation of the sampling procedures as well as statistical summaries. The analytical results will be disseminated through internal reporting, NOAA's Greater Atlantic Regional Fisheries Office's website, and possibly through peer-reviewed publication. Interviewees will also be asked during the survey if they wish to receive a report of the aggregated results and will be given the option to receive them either by mail or email.

**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.