

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Large Pelagic Fishing Survey
OMB Control No. 0648-0380

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Cite all applicable authorities for this information collection.**

This request is for extension of a currently approved collection, to continue the Large Pelagic Fishing Survey in all states along the Atlantic and Gulf Coasts, as well as Puerto Rico.

The National Marine Fisheries Service (NMFS) is responsible for monitoring and managing United States (U.S.) marine fisheries resources. Collection of information regarding fishing for large pelagic species (tunas, billfishes, swordfish, and sharks) is necessary to fulfill the following statutory requirements: [Atlantic Tunas Convention Act](#) (16 U.S.C. 971 et seq.), the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 et seq.), and to meet administrative requirements of the National Marine Fisheries Service (NMFS) Marine Recreational Fishery Policy implemented to comply with [Executive Order 12962](#) on Recreational Fisheries.

The Atlantic Tunas Convention Act at 16 U.S.C. 971d(c)(3)(I) provides the Secretary of Commerce the authority to “require any commercial or recreational fisherman to obtain a permit from the Secretary and report the quantity of catch of a regulated species”. Section 303(a) of the Magnuson-Stevens Act specifies data and analyses to be included in Fishery Management Plans (FMPs), as well as pertinent data, which shall be submitted to the Secretary of Commerce under the plan. Recommendation One of the NMFS Marine Recreational Fishery (MRF) Policy focuses on developing “a comprehensive data acquisition and analysis system (participation, catch, effort and socio-economic data) on a regular, continuing basis” in support of the Executive Order 12962 requirement to assess the implementation and evaluate achievements of the “Recreational Fishery Resources Conservation Plan.”

Because highly migratory species are only sought on a relatively small proportion of the total marine recreational angler fishing trips made, the fishing effort directed at such species, and the resulting angler catches are generally not estimated very precisely or accurately by general (all species) recreational surveys. Therefore, the Large Pelagic Survey (LPS) was designed as a specialized survey that would focus specifically on the recreational fishery directed at large pelagic, also called highly migratory, species. This specialization has allowed higher levels of sampling needed to provide more precise and accurate estimates of pelagic fishing effort and catches of large pelagic species.

Telephone survey portion species-level response options have been updated to include blue marlin and roundscale spearfish beginning in 2020. As specified in 50 CFR Part 635.27(d) (1), the recreational billfish fishery is limited to a maximum of 250 Atlantic blue and white marlin and roundscale spearfish landings, combined, per year. White marlin response options have previously been included on the telephone survey. Porbeagle shark response options were also added to the telephone survey for 2020. Domestically, porbeagle sharks are managed pursuant

to a rebuilding plan established in Amendment 2 to the 2006 Consolidated HMS FMP (73 FR 35788, June 24, 2008 as corrected at 73 FR 40658, July 15, 2008).

The LPS consists of two complementary surveys: a directory frame telephone survey of tuna and/or HMS permit holders to obtain fishing effort information (Large Pelagic Telephone Survey or LPTS), and a dockside survey which collects catch information and also estimates the proportion of vessels fishing for large pelagics that are not on the telephone frame (Large Pelagic Intercept Survey or LPIS). Results from the two survey components are combined to estimate total landings of Highly Migratory Species. In addition, we are requesting approval to continue to implement the Large Pelagic Biological Survey (LPBS) to collect supplemental weight and length measurements of landed fish through independent dockside sampling, as well as LPIS Validation telephone calls to validate LPIS data. Implementation of certain components will depend on fiscal year funding and NMFS priorities. The proposed annual reporting burden anticipates full funding for all data collection components.

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.**

NMFS, regional fishery management councils, interstate marine fisheries commissions, and state fishery agencies use the data in developing, implementing and monitoring fishery management programs. Failure to conduct these data collections would prevent the Secretary from meeting statutory requirements of the Magnuson-Stevens Act. In addition, NMFS would be unable to implement Recommendation One of its Marine Recreational Fisheries (MRF) Policy with a resulting loss in service and credibility to the MRF constituency. Catch and effort statistics are fundamental for assessing the influence of fishing on any stock of fish. The quantities taken, the fishing effort, and both the seasonal and geographic distributions of the catch and effort are required for the development of regional management policies and plans. Accurate and timely catch statistics collected over the range of a species must be used in association with biological studies to perform the stock assessments necessary for monitoring the effectiveness of fishery management planning for optimum yield. Several large pelagic species are now being managed under FMP quota or landings limit systems, which include recreational fishery components. For example, this collection has been the key source of data used to monitor recreational quotas for the harvest of bluefin tuna in the Mid-Atlantic and southern New England regions. Catch distributions, harvested size distributions, and other indices obtained in this data collection have formed the basis of fishery management plans and used in stock assessments for Atlantic highly migratory species such as tunas, billfish, swordfish and sharks.

Specific data elements that will be collected from the different LPS components include:

Large Pelagic Telephone Survey

- a. Questions about the type of fishing activity are used to confirm that the boat is not a commercial or for-hire fishing vessel,
- b. A question about targeted species is used to confirm that the vessel is eligible for the survey,
- c. Number of total fishing trips and number of fishing trips targeting large pelagic species

are used to estimate the total number of fishing trips,

- d. Questions about the launch characteristics (time, location, etc.) are compared to LPIS samples to determine if samples are representative fishing activity,
- e. The targeted species is used to confirm that reported trips were LPS trips,
- f. Questions about trip characteristics (number of anglers, number of fishing lines, fishing method, etc.) are used to produce alternative measures of fishing effort,
- g. Catch questions are used to assess coverage of the LPIS (e.g., catch at private access sites not covered by the LPIS).

Large Pelagic Intercept Survey

- a. Questions about permit status, registration numbers, and the name of the boat are used to determine if vessel is on LPTS sample frame,
- b. Targeted species is used to determine if the intercepted trip is eligible for the survey,
- c. Number of fishing lines, number of people fishing, time spent fishing, bait and fishing method are used to estimate different measures of fishing effort,
- d. Location of fishing and distance from shore distinguishes federal trips from state trips and provides more detailed spatial information on catch and effort
- e. Number caught by species is used to estimate catch rates,

Large Pelagic Biological Survey

- a. Name of the boat and Federal HMS fishing permit number determine if the vessel is included on the LPTS sample frame,
- b. Type of fishing is used to provide biological information by gear type,
- c. Questions about tournament fishing are used to distinguish biological information for tournament and non-tournament fishing and determine if LPBS samples are representative of all types of fishing activity.
- d. Location of fishing is used to provide size distributions for different locations.

LPIS Telephone Validation

- a. Questions about the boat name and fishing site name are used to confirm the identity of the respondent,
- b. A questions is asked to confirm that the respondent was interviewed for the LPIS,
- c. Questions about targeted species and catch are used to confirm that LPIS responses are accurate and recorded properly,
- d. Questions about the activity of the LPIS interviewer are asked to confirm that the LPIS interview was conducted properly.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. 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. Prior to dissemination, the information will be subjected to quality control measures and a 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.

LPS Dockside interview forms (both intercept and biological sampling) are scanned using Optical Character Recognition (OCR) technology for maximum efficiency and data accuracy. The Large Pelagic Telephone Survey utilizes Computer-Assisted Telephone Interviewing (CATI) technology with built-in error and logic checks and skip patterns that both reduce the response burden and improve on data quality. In addition, a Web tool Internet reporting option was added for the Large Pelagic Telephone Survey in an effort to increase response rates.

4. Describe efforts to identify duplication.

NMFS has the lead Federal responsibility for collection of data from marine recreational fishermen and coordinates informational needs with other agencies. NMFS has also worked with State fishery agencies each year to coordinate data collection efforts and avoid duplication. In some cases, NMFS employs State personnel under contract to conduct field interviewing. A specialized data collection such as the LPS overlaps to a minor extent with NMFS' more comprehensive Marine Recreational Information Program (MRIP) surveys (0648-0652 and 0648-0659). Such overlap is minimal because the MRIP is designed to cover marine recreational fishing for all finfish species, including many sites on inland bays and estuaries. Because large pelagic species typically occur further offshore, requiring larger vessels and specialized gear, the participants tend to use specific ports located at points of ocean access. Contacts with anglers who fished for large pelagic species are relatively rare in the MRIP samples and relatively few respondents are surveyed by both the LPS and the MRIP in a given year. However, anglers who fish for large pelagic species, but also fish for other species, are not excluded from MRIP sampling because representative sampling of their fishing trips in relation to other marine recreational angler fishing trips is necessary to avoid biasing catch estimates for any given species.

NMFS also requires anglers to report their landings of Atlantic bluefin tuna and billfish directly via a toll-free number, via the internet, or via landings cards in the states of North Carolina and Maryland for real-time quota monitoring. This requirement is covered under OMB No. 0648-0328. Although these other data collections overlap to a minor extent with the LPS (i.e., only trips landing bluefin tuna, billfish, or swordfish are affected), they do not collect information on all the other finfish species caught on large pelagic fishing trips nor do they collect information on fish released or discarded, which is needed for Federal fisheries management. The LPS is the only survey designed to obtain accurate and precise marine recreational fishery catch information for all large pelagic species. In addition, to the extent overlap occurs (e.g., a person directly reporting bluefin tuna is also selected for a dockside or telephone interview), the information is useful to assess compliance with the direct reporting requirement. Therefore, data from these other programs have been used in a complementary manner along with LPS data.

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

All charterboat respondents to the LPS are considered to be small businesses. Charter boat businesses are frequent respondents due to the high level of fishing effort relative to private recreational vessels. The survey instruments have been restricted in length to minimize response time per interview, and randomized sampling will distribute dockside reporting burdens among individual charter boat operators.

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

An annual survey of recreational anglers is required to monitor changing conditions in the fishery and support modifications in fishery regulations for each fishing year. A continuous time series of data is scientifically essential. Without continued data collections, the U.S. would not be able to meet essential monitoring and reporting requirements to international treaties that we are party to and domestic management of highly migratory species would be compromised significantly. Due to shifting migratory patterns, spatial availability to recreational anglers, pulse-like nature of these fisheries, and other factors, landings and size distribution of many large pelagics fluctuate significantly from year to year. Important changes taking place in the fishery and the stock status may be undetected if the LPS were not conducted every year.

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

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe 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 January 7, 2020 (FR Vol.85, No.703) solicited public comments. No comments were received. MRIP is a collaborative effort among government agencies, independent scientists, recreational fishing groups and conservation organizations to ensure scientifically rigorous collection of appropriate information that meets manager and stakeholder needs. Subsequently, MRIP staff members maintain regular communication with customers, through workshops, workgroup meetings and one-on-one consultations. For example, The MRIP Executive Steering Committee (ESC), which includes senior managers from NOAA Fisheries, the Executive Directors of the Interstate Marine Fisheries Commissions, and a representative from the Marine Fisheries Advisory Committee, provides general oversight of

MRIP and ensures that the program satisfies Federal, state and stakeholder needs for recreational fishing statistics. The ESC meets annually to review program activities, strategically allocate funds to addresses data needs and approve research priorities. Similarly, the MRIP Survey Operations Team (SOT), which is responsible for developing and testing improved data collection designs, includes representatives from NOAA Fisheries headquarters, regional offices and science centers, the Interstate Marine Fisheries Commissions and state natural resource agencies. The OT meets 1-2 times each year to identify regional and state needs for recreational fishing statistics and develop research priorities.

In addition, NOAA staff participate in biannual meetings with the Atlantic Highly Migratory Species Advisory Panel (HMS AP), which represents commercial and recreational fishing interests, the scientific community, and the environmental community who are knowledgeable about Atlantic HMS and/or Atlantic HMS fisheries. Recent feedback and questions resulting from NMFS HMS Management Division meetings and HMS AP meetings include the following:

- Optimize sampling to improve standard errors for rare event species. Response: We regularly evaluate sampling allocations to maximize the efficiency of data collections.
- Expand HMS data collections to additional regions. Response: Expansion of data collections to additional regions is contingent upon the availability of additional funding.
- Consolidate different reporting requirements into single data collection. Response: Over the past several years, we have integrated the LPS with mandatory reporting requirements in North Carolina in Maryland. In addition, MRIP is collaborating with state and Federal partners to design and test logbook data collections for federally permitted vessels.
- Revise the LPTS Questionnaire to include response options for blue marlin, roundscale spearfish and porbeagle in the list of large pelagics species covered by the survey. Response: The relevant LPTS questions were revised to include blue marlin, roundscale spearfish and porbeagle.

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

Neither payments nor gifts will be provided to respondents.

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

Responses to LPS questions by federally permitted fishing vessels are mandatory. Consequently, responses are kept confidential as required by section 402(b) of the Magnuson-Stevens and [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. Section 402(b) stipulates that data required to be submitted under an FMP shall be confidential and shall not be released except to Federal employees and Council staff responsible for FMP monitoring and development or when required under court order. 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 questions of a sensitive nature are requested in this collection of information.

12. Provide an estimate in hours of the burden of the collection of information. (add rows as necessary)

For wage costs: use www.bls.gov/oes , then click on OES Data in the left-hand column, then National to find Occupational Employment Wage Rates for the current year. Find the appropriate Occupational Title of the Respondent completing the Information Collection and use the Mean hourly wage.

The total annual burden for the LPS is estimated at 3,608 hours, for an estimated 25,557 responses by 15,024 unduplicated respondents. An hourly labor rate of \$24.98 is based on the average hourly earnings of all occupations (https://www.bls.gov/oes/current/oes_nat.htm). There are no other costs to respondents. There are also no recordkeeping requirements associated with the Large Pelagic Survey. A total of 3,608 burden hours is anticipated, resulting in a labor cost to respondents of approximately \$90,127.84.

Calculations for specific components are as follows:

(a) Large Pelagics Telephone Survey

Based on the HMS permit list size (i.e., sample frame) and previous year's sampling effort, the estimated target interview sample size for future years is 15,900 for the Northeast and Southeast Regions combined. Due to the random selection process, some will be contacted more than once and some not at all. Estimates of the number of respondents contacted given this sample size of interviews were determined from 2019 results. Because calls are made on a bi-weekly basis to collect information about a two-week period of fishing activity, it is important that a representative sample be obtained. This requires that prior respondents be eligible for resampling in future weeks.

The LPTS target sample size is 15,900 interviews. Since some respondents will be selected more than once per year, based on prior years' data this sample size will result in an estimated 12,020 unduplicated respondents to the LPTS. The average time per completed interview is estimated to be 11 minutes. **The estimated LPTS burden for 15,900 interviews is 2,915 hours.**

(b) Large Pelagics Intercept Survey

At full funding, a total of 7,870 dockside interviews will be targeted annually at LPS sites. This includes interviewing in the Northeast and Southeast Regions. Since some respondents will be selected for LPIS more than once per year, this sample size will result in an estimated 3,803 unduplicated respondents to the LPIS. Based on prior years, it is estimated that 21% (799) of these respondents will also have been interviewed for the LPTS, reducing the 3,803 figure to 3,004). The average response burden for the 7,870 interviews is estimated at 5 minutes per intercept for a total of 656 total hours. In addition, field interviewer performance would be evaluated by validating 10 percent of dockside intercepts via a follow-up telephone call. The 787 calls (1.5 minutes each) would add 20 hours to the annual burden estimate. **Total burden for the dockside survey would be 676 hours annually.**

(c) Large Pelagics Biological Survey

Supplemental biological sampling interviews are estimated at 1 minute per intercept because few questions are asked of anglers and length/weight data and samples are obtained directly from the fish. At a sampling level of 1,000 interviews per year of intercept respondents in (b) (including biological sampling in the Northeast, Southeast and Gulf), **the total annual burden for the supplemental biological sampling is estimated at 17 hours.**

Information Collection	Type of Respondent (Occupational Title)	# of Respondents (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Mean Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Large Pelagics Telephone Survey	All occupations	12,020	1.30	15,900	0.1833	2,915	24.98	72,816.70
Large Pelagics Intercept Survey	All occupations	3,004	2.06	8,657	0.0833	676	24.98	16,886.48
Large Pelagics Biological Survey	All occupations	1,000	1	1,000	0.0166	17	24.98	424.66
Totals				25,557		3,608		90,127.84

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). (add rows as necessary)

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. (add rows/information as necessary)

At a fully funded level, the average annual cost to the Federal government is approximately \$2,042,754, divided as follows: \$1,792,754 in contract award money and \$250,000 in professional staff, overhead and computing costs.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-03/04	250,000			250,000
Contractor Cost		1,792,754			1,792,754
Travel					0
Other Costs					0
TOTAL		2,042,754			2,042,754

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

The following tables show the changes and in the number of respondents, responses, time estimates, labor costs, and miscellaneous costs; and explains the reasons for these changes.

Updating the telephone survey portion’s species-level response options to include blue marlin, roundscale spearfish and porbeagle beginning in 2020 does not affect the burden estimate.

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Large Pelagics Telephone Survey	12,020	12,020	15,900	15,900	2,915	2,915	Update species-level response options - no additional burden.
Total for Collection							
Difference							

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

LPS data and estimates will be included in annual catch reports to the International Commission for the Conservation of Atlantic Tunas (ICCAT) and several documents frequently produced in support of NMFS rulemakings (e.g., Environmental Assessments, Regulatory Impact Reviews, Stock Assessment and Fishery Evaluation Reports). LPS data can also be accessed online at: www.st.nmfs.noaa.gov/recreational-fisheries/access-data/run-a-data-query/queries/index Additional summaries of data may be included in the annual NMFS publication "Fisheries of the United States".

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.

The expiration date will be displayed.

18. Explain each exception to the certification statement.

There are no exceptions for compliance with provisions in the certification statement.