

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
Recreational Angler Survey of Sea Turtle Interactions
OMB Control No. 0648-0774

Abstract

NOAA Fisheries proposes to extend an information collection designed to assess hook and line interactions between recreational anglers at shore-based fishing locations, including piers, and sea turtles. The collection comprises an Angler Intercept Survey, Fishing Site Characterization Form, Survey Cover Sheet, and Sea Turtle Incidental Capture Form. The Angler Intercept Survey will be administered at shore-based fishing locations along the Atlantic and Gulf of Mexico coasts to approximately 20,000 recreational fishermen. The respondents will be verbally asked about their fishing practices and observations of sea turtles, and the interviewer will record their answers. The survey will assess the feasibility of an intercept survey for this purpose (response rates and data collection). The Fishing Site Characterization Form will be completed by the survey administrator once at each fishing location to collect information on the structure and operation. The survey administrator will complete the Site Characterization during each survey period, recording information on environmental conditions and number of anglers, lines in the water, and surveys completed. The Sea Turtle Incidental Capture Form will be completed by a Sea Turtle Stranding and Salvage Network participant when a turtle is incidentally captured, regardless of whether the capture occurs during a survey period, to collect information on the specific interaction with fishing gear. This information is necessary to compare to the angler survey data to identify if certain factors or fishing practices influence interaction rates. Minor revisions were made to the Sea Turtle Incidental Capture Form to eliminate duplication with other data collection efforts.

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) plans 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 Atlantic and Gulf of Mexico 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 specific information about recreational piers (defined here to include piers and other shore-based structures), the anglers that fish on piers, 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. NOAA Fisheries can use this information to evaluate the impact this sector has on sea turtle populations and determine conservation measures (voluntary or required) that can be implemented to reduce interactions. This collection (0648-0774) was approved in 2018, however due to the Covid-19 pandemic and delayed funding, the survey was not implemented.

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.*), complete Section 7 analyses, and inform management decisions, and will provide necessary data for the conservation and recovery of endangered and threatened sea turtle populations.

Additionally, NOAA was approved to receive funding through Deepwater Horizon Oil Spill Natural Resource Damage Assessment Restoration program. A project titled, “Reducing Sea Turtle Bycatch at Recreational Fishing Sites” has been funded by the Regionwide Trustee Implementation Group (<https://www.fisheries.noaa.gov/feature-story/996-million-approved-continue-restoring-gulf-wide-resources-impacted-deepwater-horizon>). The project will provide funds to implement angler surveys for up to 2 years in each of the 5 Gulf of Mexico states to better understand co-factors related to shore-based hook and line bycatch of sea turtles.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The sea turtle interaction data 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 identify co-factors contributing to shore-based recreational bycatch with the goal of understanding if changes to fishing practices can be implemented to reduce bycatch. The survey will be administered in a maximum of ten 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 will 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 location that is included within the survey. The purpose of the form is 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 will be completed by survey administrators throughout the Atlantic and Gulf of Mexico coasts. This form would be filled out at each pier location 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 will 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, and while fishing at that particular site. Part 3 asks for information about the most recent sea turtle capture, if applicable. This section asks for 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 (STSSN) participant when a turtle is incidentally captured, regardless of whether the capture occurs during a specific survey period, and collects information on the specific interaction, including time of day, bait type, hook type, and how and where on its body the turtle was hooked or entangled. This information is necessary as it can be compared to the angler survey data to identify if certain factors or fishing practices influence the rate of interactions.

Additionally, instructions and survey design guidance are 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, reports, and will be published in scientific literature as appropriate. These documents are 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. 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 collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The angler survey will be completed using verbal responses from the public (recreational fishers). 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. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

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 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 will be provided to the STSSN to standardize the information the STSSN collects on incidentally captured turtles, and it is intended to complement the data collected through the Angler Survey, to allow NOAA to better determine co-factors influencing sea turtle bycatch. Individual STSSN 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 impacts small businesses or other small entities, describe any 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 consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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.

Additionally, as mentioned above, NOAA has recently received approval to conduct a project as part of the Deepwater Horizon Oil Spill Natural Resource Damage Assessment and Restoration process. The project would provide funding for up to 2 years of angler surveys in each of the 5 Gulf of Mexico states. NOAA is the lead implementing Trustee for the project and will be required to complete this project and report on the findings.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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.

A Federal Register Notice published on August 19, 2021 (86 FR 46680) solicited public comment on this collection. One comment was received. The commenter was concerned about proposed costs to taxpayers to implement the survey. We recognize this concern, however these data are critical to meet NOAA Fisheries mandates under the ESA to monitor and reduce the bycatch of sea turtles.

Additionally, implementation of this survey collection in the five Gulf of Mexico states will be conducted as part of a funded project called “Reducing Sea Turtle Bycatch at Recreational Fishing Sites,” through the Deepwater Horizon Oil Spill Natural Resource Damage Assessment and Restoration program. The Deepwater Horizon oil spill was the largest in U.S. history, impacting the entire northern Gulf of Mexico ecosystem. Federal and state agencies are working to restore Gulf resources with \$8 billion in natural resource damage settlement funds. Therefore, the funds for the Gulf state surveys are not Congressionally appropriated, and are not at the expense of taxpayers.

9. Explain any decision to provide any payment or gift 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 the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Participation in this survey is voluntary and no PII will be collected. The information collected will be protected and kept anonymous if released. The Privacy Act does not apply.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No sensitive questions are asked.

12. Provide estimates of the hour burden of the collection of information.

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 10 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 intercept up to 200 individual anglers at each site.

Form 3: Angler Intercept Survey (public - 3,333.33 hours over 3 years)

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

10 sites x 200 surveys = 2,000 total angler surveys per state
2,000 surveys x 10 states = 20,000 total surveys over the 3-year period
20,000 x 10 minutes = 200,000 minutes / (60 minutes/hr) = 3,333.33 hours (annualized to 1,111.11 hours per year)

Form 4: Sea Turtle Incidental Capture Intake Form (STSSN local participant - 125 hours over 3 years)

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

We are assuming 50 ICs per year per state. This is a high estimate for most states. We propose allowing the STSSN for each of the 10 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 10 states = 1,500 ICs total
1,500 forms x 5 minutes = 7,500 minutes / (60 minutes/hr) = 125 hours (annualized to 41.67 hours per year).

Information Collection	Type of Respondent (e.g., 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)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Angler Intercept Survey	Angler	6,667	1	6,667	10min	1,111	\$26.85*	\$29,835

Sea Turtle Incidental Capture Intake Form	STSSN participant	10	50	500	5min	42	\$26.85	\$1,119
Totals				7,167		1,153		\$30,954

* An hourly rate of \$26.85 is based on the average for all civilian workers from the National Compensation Survey (September 16, 2021; <https://www.bls.gov/news.release/ecec.nr0.htm>).

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. 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. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

As mentioned above, the implementation of this survey is funding dependent. In September 2021, NOAA was approved to receive funding through Deepwater Horizon Oil Spill Natural Resource Damage Assessment Restoration program. A project titled, “Reducing Sea Turtle Bycatch at Recreational Fishing Sites” has been funded by the Regionwide Trustee Implementation Group (<https://www.fisheries.noaa.gov/feature-story/996-million-approved-continue-restoring-gulf-wide-resources-impacted-deepwater-horizon>). The project will provide funds to implement angler surveys for up to 2 years in each of the 5 Gulf of Mexico states to better understand co-factors related to shore-based hook and line bycatch of sea turtles.

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 or partnerships, the Federal cost per state would be the hiring of two 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. Estimated at \$50,000 per state for 5 states (\$250,000 total, or \$83,334 annually). There will be no cost to the Federal government for implementing the collection or for project oversight for the 5 states in the Gulf of Mexico, as these costs are fully supported by the Deepwater Horizon Oil Spill Natural Resource Damage Assessment Restoration funded project.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP III - step 3	\$132,183	5%		\$6,610

Other Federal Positions					
Contractor Cost		\$83,334	100%		\$83,334
Travel					
Other Costs:					
TOTAL					\$89,944

15. Explain the reasons for any program changes or adjustments reported in ROCIS.

This is a new program. This collection (0648-0774) was approved in 2018, however due to the Covid-19 pandemic and delayed funding, the survey was not implemented.

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	
Angler Intercept Survey	6,667	3,333	6,667	3,333	1,111	556	We have received funding to support implementation for the 5 states in the Gulf of Mexico and we plan to implement in a maximum of 5 additional states along us US Atlantic Coast.
Sea Turtle Incidental Capture Intake Form	500	250	500	250	42	21	We have received funding to support implementation for the 5 states in the Gulf of Mexico and we plan to implement in a maximum of 5 additional states along us US Atlantic Coast.
Total for Collection	7,167	3,583	7,167	3,583	1,153	577	
Difference	+3,584		+3,584		+576		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Angler Intercept Survey	\$29,835	\$14,012	0	0	We have received funding to support implementation for the 5 states in the Gulf of Mexico and we plan to implement in a maximum of 5 additional states along us US Atlantic Coast.
Sea Turtle Incidental Capture Intake Form	\$1,119	NA	0	0	Labor cost omitted on previous approval in error.
Total for Collection	\$30,954	\$14,012	0	0	
Difference	+16,942		0		

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The data will be used to develop agency documents as noted above. For the 5 states in the Gulf of Mexico for which implementation will be supported by DWH Restoration funds, annual reports will be developed for project activities completed during the 5-year project duration (2022-2026). We anticipate the angler survey component of the project will be completed in the years 2023, 2024, and 2025. If appropriate, peer-reviewed publications in scientific literature are anticipated to be made public approximately 2 years after the completion of the project.

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).