

**SUPPORTING STATEMENT
MARINE RECREATIONAL FISHERY STATISTICS SURVEY
OMB CONTROL NO. 0648-0052**

A. JUSTIFICATION

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

This request is for a revision of this information collection.

Collection of these data is necessary to fulfill statutory requirements of Section 303 of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1853 et. seq.) as amended (MSA) and to comply with Executive Order 12962 on Recreational Fisheries. Section 303 (a) of the MSA specifies data and analyses to be included in Fishery Management Plans (FMP), as well as pertinent data that shall be submitted to the Secretary of Commerce under the plan.

This revision will fulfill statutory requirements of Section 401 of the MSA. Section 401 (g) requires that the Secretary of Commerce, “establish a program to improve the quality and accuracy of information generated by the Marine Recreational Fishery Statistics Survey”. This act further specifies that future surveys should, “target anglers registered or licensed at the State or Federal level to collect participation and effort data”, and that the program, “to the maximum extent feasible implement the recommendations of the National Research Council (NRC)” that were provided in a 2006 review of the methods currently used by the National Ocean and Atmospheric Administration’s (NOAA), National Marine Fisheries Service (NMFS) to survey marine recreational fishing effort and catch.

Dual-Frame Mail Survey of Fishing Effort

The NRC Review suggested that recreational fishing surveys suffer from inefficiency, potential bias due to under-coverage of angling populations, and potential bias due to non-response (NRC, 2006). NMFS is addressing these concerns by developing and implementing the Marine Recreational Information Program (MRIP), an improved system of surveys that will replace existing marine recreational fishing data collection programs. One of the primary objectives of MRIP is to address the recommendation that future telephone surveys of fishing effort should utilize available lists of licensed or registered saltwater anglers as sampling frames. To this end, NMFS implemented angler license directory surveys (ALDS) in the Gulf of Mexico in 2007 and North Carolina (NC) in 2008. To ensure complete coverage of angling populations, including both licensed and non-licensed anglers, these license-based telephone surveys have been integrated with the Coastal Household Telephone Survey (CHTS), which utilizes a random-digit dialing methodology, in a dual-frame approach.

Implementation of ALDS has significantly increased the efficiency of recreational fishing effort surveys; between 35-65% of respondents report fishing activity in the ALDS compared to 5-12% for the CHTS. However, the ALDS suffers from potential coverage error and/or non-response error due to missing or bad telephone numbers; between 20-40% of records are unreachable because telephone numbers are missing, non-working or incorrect. In addition, the CHTS component of the dual-frame approach suffers from potential coverage error due to the

increasing prevalence of cell phone-only households. This requested revision will address these concerns by testing the effectiveness of mail surveys for contacting anglers and collecting recreational fishing data. Like current telephone surveys, mail surveys will target licensed anglers (state license databases), as well as random households within coastal states (United States Post Office (USPS), Delivery Sequence File (DSF)). It is expected that mail survey frames will provide more complete coverage of angling populations than telephone survey frames because anglers are required to provide an address and/or present a valid driver's license when purchasing a saltwater fishing license, and the DSF can provide a complete frame of residential addresses within the United States. The proposed mail survey will run concurrently with ongoing telephone surveys for benchmarking purposes, as well as to allow direct comparisons between the two methodologies.

Angler Diary Surveys

The NRC also identified potential problems with on site surveys, which collect catch information at the conclusion of recreational fishing trips. Generally, these surveys are conducted by trained interviewers at publicly-accessible fishing sites such as public piers, beaches, marinas and boat ramps. Because the coverage of onsite surveys is limited to public-access sites, estimates of total catch rely on assumptions about the behavior and success of anglers who access the water from private-access sites such as private residences, community beaches, marinas and docks, and private yacht clubs. Specifically, current sampling and estimation approaches assume that anglers who are not accessible to interviewers (private-access) exhibit similar behavior and have similar success as anglers who are accessible to interviewers (public-access). The NRC criticized the fact that this assumption has not been tested. This requested revision will test the assumption that private-access anglers' behavior and success are the same as that of public-access anglers by collecting catch data and angler behavior data through an angler diary survey.

The dual-frame mail survey and angler diary survey will be combined in a single data collection effort. Specifically, the mail effort survey, which will result in estimates of recreational angler trips by fishing mode (shore fishing, boat fishing), will also be utilized as the screener questionnaire for the angler diary survey. Respondents to the effort survey/screener questionnaire will be sent a survey packet for the angler diary survey. Combining the two objectives into a single data collection effort will help minimize respondent burden.

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 data are used annually by NMFS, regional fishery management councils, interstate marine fisheries commissions, and state fishery agencies in developing, implementing and monitoring fishery management programs, per statutory requirements of the Magnuson-Stevens Act of 1996. 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 fish species are now being managed under FMP quota systems that include recreational fishery components. For example, this collection has been the key source of data used to monitor recreational quotas for the harvest of red snapper, king mackerel and Spanish mackerel in the Southeast Region. This collection provides coastwide information on quantity, species composition, and size distribution of catch. Such information is not available from any other source. For example, catch distributions and harvested size distributions obtained in this data collection have formed the basis of FMP developed for bluefish, red drum, red snapper, summer flounder, weakfish, winter flounder, and other key species targeted by the marine recreational fishery.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. 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.

The final questionnaires for this data collection will be developed through a series of pretests, including focus groups and cognitive interviewing. The questionnaires, a self-administered screening mail survey followed by an self-administered mail angler diary for applicable respondents, will be designed to collect the data elements currently collected through the CHTS, ALDS, and MRFSS Intercept Survey.

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 telephone and mail. Automated technology will be used to identify overlapping records between angler list frames and random household address frames (USPS DSF).

4. Describe efforts to identify duplication.

Mail surveys that sample from angler lists will be integrated with surveys that sample from random address frames. Sample frames will be matched prior to data collection to identify overlapping units. Data reconciliation software that has been specifically developed to match records from multiple databases will be used to identify overlapping units. Similar procedures will be used to identify overlap between mail and telephone surveys.

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 revision.

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

If an annual survey of recreational anglers were not conducted, effective monitoring of changing conditions in the fishery and adequate information to support modifications in fishery regulations for each fishing year, would be less likely. A continuous time series of data is scientifically essential.

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 December 23, 2008 (73 FR 78723) solicited public comment on this revision. No comments were received.

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

The sample of anglers/households will receive a \$1.00 cash incentive. The benefits of cash incentives on mail survey response rates are well documented (Church, 1993).

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

As stated on forms, 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 sensitive questions are asked.

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

The revised total burden for the MRFSS will be 46,920 hours (current hours of 44,745 plus new hours of 2,175). The screener questionnaire (mail survey of fishing effort) will be asked of approximately 16,580 respondents (16,580 x 4¹ minutes/60 minutes = 1,105 hours). Of these, approximately 2,089 will receive and complete a follow-up diary survey (2,089 x 30 minutes/60 minutes = 1,044.5 hours). In addition, NMFS will pretest both the screener questionnaire and the questionnaire on 50 individuals. Participating in the pretest will take approximately 30 minutes per respondent.

Adding the new unduplicated respondent total of 16,630 (16,580 + 50) will bring the new respondent total from 724,675 to 741,305.

Adding the 18,719 responses (16,580 + 2,089 + 50) will bring the new response total from 887,821 to 906,540.

1 Average time over all respondents including respondents who have fished (9 minutes) and respondents who have not fished (1 minute).

Total burden attributable to this revision will be approximately 2,175 hours, determined as follows:

Activity	# Respondents	Responses	Minutes/ activity	Total Hours
Screening Questionnaire (Effort Survey)	16,580	16,580	4	1,105
Angler Diary ² Questionnaire	2,089	2,089	30	1,045
Pretests	50	50	30	25
Totals	16,630	18,719		2,175

Adding the new burden of 2,175 hours will bring the new burden total from 44,745 to 46,920 hours.

2 Respondents to the angler diary survey are a subset of the respondents to the screening questionnaire and do not represent new respondents.

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.

Annual cost to the Federal government is approximately \$225,000 divided as follows: \$200,000 in data collection costs and \$25,000 in professional staff, overhead and computing costs.

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

This program change to implement a mail survey of recreational anglers will add 16,630 respondents, 18,719 responses and 2,175 burden hours to the current totals of 724,675, 887,821 and 44,745.

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

All data collected and analyzed will be included in table format available on the web page of the Fisheries Statistics Division, Office of Science and Technology, National Marine Fisheries Service. The web address is <http://www.st.nmfs.gov/st1/recreational>. Additional summaries of data will be included in the annual 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.

N/A.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

N/A.