SUPPORTING STATEMENT
COOK INLET BELUGA WHALE PROTECTION PRETEST ECONOMIC SURVEY
OMB CONTROL NO. 0648-XXXX

A. JUSTIFICATION

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

The population of Cook Inlet beluga whales (*Delphinapterus leucas*), found in the Cook Inlet of Alaska, is one of five distinct population segments (DPSs) in United States (U.S.) waters. It was listed as endangered under the Endangered Species Act (ESA) on October 22, 2008 (73 FR 62919). It is also a depleted species under the Marine Mammal Protection Act (MMPA) of 1972 (16 U.S.C. 1362). The public benefits associated with the results of protection actions on the Cook Inlet beluga whale (CIBW), such as population increases, are primarily the result of the non-consumptive value people attribute to such protection (e.g., active use values associated with being able to view beluga whales and passive use values unrelated to direct human use). Little is known about these values, yet such information is needed for decision makers to more fully understand the trade-offs involved in choosing among potential protection alternatives and to complement other information available about the costs, benefits, and impacts of protection alternatives. A general population survey is needed that will collect information that provide insights into public values for protection of CIBWs and the impacts of that protection.

The National Marine Fisheries Service (NMFS) is the primary agency responsible for the protection of marine mammals, including Cook Inlet beluga whales. Multiple management actions will be considered by NMFS in its efforts to protect and aid the recovery of the CIBW DPS. In deciding between management actions, policy makers must balance the ESA and MMPA goals of protecting CIBWs from further declines with economic activities and development in the Cook Inlet region. Cook Inlet beluga whale protection actions may be subject to Executive Order 12866 (58 FR 51735), which requires regulatory agencies to consider costs and benefits in deciding among alternative management actions.

This information collection request is for a pretest that precedes the full survey implementation that is anticipated to be implemented to measure public preferences for Cook Inlet beluga whale protection. The pretest will provide researchers with feedback to evaluate the survey instrument. In particular, the pretest will gather a sufficient number of responses to evaluate the information presentation, reliability, internal consistency, response variability, and other properties of a newly developed survey. Results from these activities will be used to make improvements to the survey instrument and survey administration approach. Further development of the survey cannot proceed without the pretest.

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 pretest consists of implementing a small-scale mail survey on a sample of United States (U.S.) households. We will mail questionnaires to members of the sample; in addition, we will send follow-up mailings to encourage response. Among the follow-up efforts will be a telephone contact with those sample households for whom we have telephone numbers. We will try to obtain some survey information during this telephone follow-up. The survey administration protocols and procedures for assessing non-response behavior are anticipated to be used in the full implementation, so their performance in the pretest will be used to evaluate them.

Mail Questionnaire

Two principal types of information will be gathered from the pretest mail survey—responses to survey questions and information about the survey administration. Survey responses gathered from the pretest mail questionnaire include information about the following:

a. Public preferences regarding the protection of Cook Inlet beluga whales.
b. The factors that affect the public's preferences for protecting Cook Inlet beluga whales, such as the risk of extinction to the DPS, listing status, and protection costs.
c. Information on general attitudes toward protecting threatened and endangered species.

Stated preference response data collected through the pretest will be used by NMFS to gauge the feasibility of the set of attributes and attribute levels being considered and to aid in developing the experimental design for the final survey implementation. In the full implementation, these data will be used by NMFS to estimate a preference function for explaining choices between protection programs that differ in the extinction risk levels, ESA listing status, and costs. This estimated function will provide NMFS with information on public preferences and values for alternative Cook Inlet beluga whale protection programs, and what factors affect these values. This information can then be compared with program costs and other impacts when evaluating protection alternatives. Although the small sample size in the pretest will preclude statistically robust results for this purpose, preliminary analysis of the pretest data will provide results sufficient to aid in the experimental design and determine the feasibility of the set of attributes and attribute levels being considered.

The pretest will also provide information about the survey implementation, particularly indicators of response rates to the survey as a whole with different monetary pre-incentive amounts and to individual questions and factors affecting response behavior. The survey administration protocols will include contacting non-responding individuals via telephone, encouraging them to respond, and if they refuse, asking a set of questions to assist in determining whether there are differences between respondents and non-respondents. These processes are described in more detail in Part B. The pretest affords the only opportunity to test the telephone scripts and determine cooperation rates for the telephone follow-up efforts. Additionally, since this is a new survey instrument involving a public good with low salience for the public at large,

overall response rates from the pretest are needed to determine the incentive amount that maximizes response rates and the size of the initial sample to contact for the full implementation that will ensure a sufficiently large number of completed surveys for analysis.

The following is a discussion of how particular questions in the mail questionnaire will be ultimately used. Generally, the survey asks respondents for information regarding their knowledge and opinions of Cook Inlet beluga whales, other endangered species, other seals and sea lions, and potential goals and impacts of management options available to protect the endangered population of Cook Inlet beluga whales, in addition to standard socio-demographic information needed to classify respondents. It is divided into several sections.

Section 1: The Issue: Endangered Cook Inlet Beluga Whales

Prior to the first section, respondents are asked a general social issues question. To put the issue of protecting threatened and endangered species in the context that there are many social issues (each with costs), and thus to reduce survey "importance bias", Q1 asks the respondent whether less, about the same, or more should be done with respect to several other issues facing the U.S. In addition to protection of threatened and endangered species, the set of issues listed includes government efficiency, education, road and highway improvements, economic growth and jobs, and air and water pollution.

The first section identifies the Cook Inlet beluga whale as a species protected under the Endangered Species Act and presents information about the Endangered Species Act (ESA), including definitions for "endangered" and "threatened" species, which are important to the policy questions in the survey. Since the Cook Inlet beluga whale is protected as a DPS, not as a distinct species, under the ESA, respondents are informed that the ESA also may protect a DPS. The introductory material also presents a breakdown of how many species are protected under the ESA to help place Cook Inlet beluga whales in context as one of many ESA-protected species. Finally, the introduction identifies that the ESA requires reasonable actions be taken, which begins to motivate the questions about alternative actions to consider. The section also lists reasons people may care about threatened and endangered species and the types of costs that result from protecting them.

- Q2 asks how positive or negative the respondent's reaction is when they think about the Endangered Species Act. This simple question identifies people's general feelings toward endangered species protection. It provides an easy start to the process of thinking about threatened and endangered species, and it sets a tone of neutrality by allowing positive and negative reactions right from the start. In initial testing (and a past study), responses to this question were good predictors of how respondents would answer the stated preference questions.

- Q3 asks respondents whether they are aware that the ESA protects distinct population segments in addition to entire species. This question is used as a way to encourage respondents to read and understand the information regarding the ESA and its protection of DPSs in addition to entire species.

- After providing some general reasons for and against protecting threatened and endangered species (again providing a neutral perspective), Q4 addresses the importance to the respondent of general protection of threatened and endangered species, and whether protecting jobs is more or less important than threatened and endangered species protection to the respondent. Responses to this question were also found to be correlated with response patterns to stated choice questions in initial qualitative testing (i.e., focus group).

To properly value Cook Inlet beluga whales, it is vital to accurately define the good and to provide the context within which it exists to ensure that respondents fully understand what they are to value. Part of the process of providing context for the valuation involves discussing the species that may serve as substitutes in individual's minds for Cook Inlet beluga whales. In focus groups, a natural set of substitutes that people identified for Cook Inlet beluga whales is other whale species.

This section provides a graphic of endangered whales residing in U.S. waters, with some information about whether the entire species or only one or more DPSs are protected. This graphic is useful for illustrating that the Cook Inlet beluga whale is one of several whale species in the U.S. that are protected by the ESA.

- Q5 is used to determine whether respondents have had prior experience observing whales, and aids in encouraging respondents to review the information provided.

Section 2: Some Beluga Whale Facts

This brief section introduces several facts about beluga whales generally.

- Like Q5, Q6 is intended to get respondents to begin thinking about beluga whales and determine whether they are familiar with beluga whales prior to reading the survey.

Section 3: Beluga Whales in the U.S.

This brief section provides a map and table describing where the five beluga whale DPSs are, what their population sizes are, and what the population trend is for each.

- Q7 is another question intended to put the issue of Cook Inlet beluga whales in a larger context (all beluga whales) and asks respondents whether they are concerned about the DPSs that are declining given that other DPSs are stable or increasing.

Section 4: Cook Inlet Beluga Whales

This section describes how the Cook Inlet beluga whale DPS is different from the other DPSs, where it is located, its ESA listing, the past and current threats to it, its population trend, and past and present efforts to protect it, as well as the current estimated risk of extinction for the DPS under current conditions. This and the next section define the baseline of current and expected

future conditions with current management programs, which is required for proper valuation of alternative levels of protection.

- Q8, which asks whether the respondent has ever lived in or visited areas where the Cook Inlet beluga lives, is intended to get the individual to review the map that indicates where the Western and Eastern stocks are and relate the map to their own experiences.

- Respondents are asked how concerned they are about the Cook Inlet beluga whale in Q9. This information serves dual purposes. First, it encourages the respondent to read and understand what is occurring with the DPS, and second, provides information that can be used to check for consistency of preferences with responses to stated preference questions.

- Q10 asks specifically about the risk of extinction information. It is intended to encourage the respondent to read the information on extinction risk carefully and consider whether the estimate is concerning from the respondent's perspective.

Section 5: New Cook Inlet Beluga Whale Protection Actions

This section introduces the idea that more can be done to protect Cook Inlet beluga whales and sets the stage for asking about specific protection alternatives in the stated preference questions. In the section, protection actions that would help Cook Inlet beluga whales to recover are described, the term "recover" is defined, and the costs of additional protection actions (payment vehicle) are discussed in terms of the effects they would have on individual households.

- Q11 asks respondents to what extent they agree with two statements, one indicating a desire to help the Cook Inlet beluga whale recover, even if it costs more money; and the other stating that the most effective protection actions should be used even if businesses and individuals are negatively affected. The question serves the purpose of acknowledging that there are costs to protecting Cook Inlet beluga whales and informing the respondent about these costs. This is important for maintaining a neutral stance regarding protection and minimizing information bias. Additionally, agreeing with the first statement indicates a willingness to spend money to protect the DPS, while disagreement suggests individuals may not choose costly programs to help the DPS. Disagreement with the second statement provides a reason why individuals may not be willing to spend additional money to protect Cook Inlet beluga whales.

Section 6: What Alternatives Do You Prefer?

This section contains the stated preference questions, which are in a choice experiment, or stated choice, framework. The section begins with instructions for answering the questions and a budget reminder. In addition, a "cheap talk" script (e.g., Cummings and Taylor [1999]) is included to minimize potential hypothetical bias. The instructions and cheap talk script are followed by four stated choice questions (Q12, Q13, Q14, and Q15) and follow-up questions (Q16, Q17). The information from these questions will be used to estimate a Cook Inlet beluga whale protection preference function.

- In each of the four choice questions (Q12 through Q15), respondents are confronted with three alternatives that differ in what they do and how much they cost, the current Cook Inlet beluga whale protection program (Alternative A), which is the status quo alternative, and two others that do more and cost more, which are uniquely labeled Alternatives B through I in the survey to encourage respondents to view the non-status quo alternatives as distinct across choice questions. These alternatives are described by their expected results with respect to the following attributes:

  1. Population status in 50 years
  2. Risk of extinction by the year 2110
  3. Added household cost[1]

  Respondents are then asked to choose the alternative they most prefer, and which they least prefer. The status quo is always the first option to make it easy for respondents to select it (and reduce any unintended bias in selecting alternatives to do more and spend more), and to allow rank ordering of non-status quo alternatives relative to the baseline (Alternative A), which provides statistical efficiency gains over paired choices.

- In Q16, respondents are asked to agree or disagree with several statements that are used to help address several concerns about people's responses, including whether respondents feel it is their responsibility to pay for Cook Inlet beluga whale protection at all (potential protest), whether respondents had enough information to make an informed choice (the effect of uncertainty on values), whether respondents were paying just for Cook Inlet beluga whales or if they believed other species were being protected by the alternatives considered (potential embedding), whether respondents believed the federal government could effectively manage the Cook Inlet beluga whale protection programs to bring about the results being valued (potential protest), whether respondents feel they should not have to pay more federal taxes for any reason (potential protest),whether the scientific estimates of future extinction risk were believable to the respondent (potential protest), a statement about whether the respondent felt qualified to choose between different extinction risks (potential protest), and a statement indicating an unwillingness to pay if there is any risk of extinction.

- Q17 identifies how confident individuals are about their answers to the stated preference questions. Respondents stating they are "not at all confident" in their answers may be excluded from the estimation since these individuals, for whatever reason, are uncertain that their answers reflect how they feel.

- The final question (Q18) in the section is intended to gauge respondents' general environmental attitudes using questions from the New Ecological Paradigm, a series of Likert scale questions that measure pro-environmental sentiments on several dimensions

[1] In cognitive interviews, individuals were specifically asked in what form they believed they would be paying for Cook Inlet beluga whale protection programs. The vast majority responded that the added cost in the choice questions simply represents money out of their pocket, mostly in the form of federal taxes, but also from some additional expenditures on seafood products.

(Dunlap, van Liere, Mertig, and Jones, 2001). These questions have been used frequently in numerous environmental surveys. An understanding of general environmental attitudes may be helpful to explain responses to stated preference questions and enable classification of respondents.

Section 7: About You and Your Household

This final section consists of eleven questions, Q19 through Q29, that collect information about the respondent and the respondent's household to be used as explanatory variables in the stated preference model, for comparing the sample to the population (coverage or sampling bias), and for comparing respondents to non-respondents (non-response bias). To the extent possible, the questions and response categories parallel those used by the Census Bureau to allow the most direct comparisons.

- Socioeconomic, demographic, and classification information collected includes gender (Q19), age (Q20), household size (Q21), employment status (Q22), membership in an environmental or conservation program (Q23), recent fishing and hunting behavior (Q24), educational attainment (Q25), household ownership status (Q26), ethnicity (Q27), race (Q28), and income (Q29).

Telephone Follow-Up

Following the initial mailing and postcard reminder, we will contact non-respondents by telephone to encourage them to complete the mail survey[2] and to collect limited information from those who decide not to participate in the mail survey at all.[3] The information provided by these non-respondents can be compared with that from respondents to address issues concerning non-response bias. Selected socioeconomic and demographic questions, along with a few key attitudinal questions, are asked to enable conducting statistical tests in the full survey to determine whether non-respondents differ from respondents with respect to these characteristics. The attitudinal questions include versions of Q1 and Q4 from the mail questionnaire. Responses to questions like these have been shown to be correlated to responses to stated preference questions in earlier rounds of focus groups and cognitive interviews. This information can be used to evaluate and adjust the results for potential non-response bias among sample members.

As explained in the preceding paragraphs, the information gathered has utility. The National Oceanic and Atmospheric Administration (NOAA) 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

[2] Those needing a replacement survey will be mailed one following the telephone interview.

[3] In the telephone follow-up, a limited amount of information may also be collected from those agreeing to return the mail survey.

publications. Should NOAA 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.

The pretest survey will not utilize any specialized information technology.

4. Describe efforts to identify duplication.

The economics literature was consulted extensively to identify studies that valued Cook Inlet beluga whales. To date, there has not been any study that provides economic value information for Cook Inlet beluga whales. However, a recent unpublished government study by Olar, et al. (2007) valued the protection of beluga whales in the St. Lawrence Estuary in Canada, which is classified as threatened under the Species at Risk Act (SARA) in Canada. The study uses stated preference choice experiment data collected from a survey of Canadian households using an Internet-enabled web panel that achieved a cooperation rate of 52%. Mean household willingness to pay for improving the St. Lawrence Estuary beluga whale from its currently threatened status to a special concern status was estimated to be $107 (Canadian dollars), with a standard deviation of about $12. For a larger improvement, from threatened to not at risk, the mean household WTP was estimated to be $122 (Canadian dollars) with a standard deviation of about $17. While these results suggest a positive WTP for improving the status of beluga whales in the St. Lawrence Estuary, the WTP is for Canadian households and does not speak to U.S. households' preferences and values.

Although there are no existing survey efforts to understand the public's preferences and values for protecting Cook Inlet beluga whales, there are numerous examples of studies conducted to estimate the non-consumptive use value of other endangered species and marine mammals. Examples include Bosetti and Pearce (2003), Langford, et al. (2001), Jakobsson and Dragun (2001), Fredman (1995), Hagen, et al. (1992), among others. All these studies utilized contingent valuation methods, as do the vast majority of species valuation studies.[4] As a result, they are unable to fully analyze marginal values of attributes of the species protection. The proposed study departs from most of the existing literature in its use of a stated choice framework that allows marginal values of attributes of protection programs to be estimated. The added information provided by this approach arms decision makers with better information about how much the public would benefit from programs that lead to differing results, and thus represents a flexible tool for management. A recent study by Lew, Layton, and Rowe (2010) illustrates an application of this approach with respect to the valuation of protection for a U.S. threatened and endangered species (the Steller sea lion).

[4] See Loomis and White (1996) and Richardson and Loomis (2009) for summaries of the literature related to the valuation of threatened and endangered species.

5. If the collection of information impacts small businesses or other small identities, describe any methods used to minimize burden.

The collection does not involve small businesses or other small identities.

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

The pretest is necessary to assess whether the survey administration protocols and materials are adequate for implementing the full survey that will gather data for estimating public values for protecting Cook Inlet beluga whales. Without the pretest, there will be insufficient responses to develop a reliable experimental design and to evaluate the information presentation, reliability, internal consistency, response variability, and other properties of the survey. This is a critical step needed to be confident that the questionnaire is functioning in the way in which it is intended and can be successfully implemented and to evaluate the efficacy of the survey implementation methods.

If the pretest collection (and hence full collection) is not conducted, NMFS will have to rely on information about public values for other species to infer the value of protecting Cook Inlet beluga whales using benefits transfer methods to consider along with other important information in decisions about Cook Inlet beluga whale management alternatives.

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. 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 December 30, 2009 (74 FR 69062) solicited comments on the information collection. No comments were received.

In addition, the pretest survey instrument presents the latest information on Cook Inlet beluga whales, current population trends, alternative management options, and likely impacts of management options. To ensure that the information is as accurate as possible, numerous Cook Inlet beluga whale researchers and biologists have reviewed the survey instrument, including Dr. Kaja Brix and Dr. Lew Queirolo of the NMFS Alaska Regional Office, and Dr. Kim Shelden and Dr. Rod Hobbs of the National Marine Mammal Laboratory.

9. <u>Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees</u>.

Inclusion of an incentive acts as a sign of goodwill on the part of the study sponsors and encourages reciprocity of that goodwill by the respondent. Singer (2002) provides a comprehensive review of the use of incentives in surveys. She notes that giving respondents a small financial incentive (even a token amount) in the first mailing increases response rates in mail-based surveys and are cost-effective. Such prepaid incentives are more effective than larger promised incentives that are contingent on completion of the questionnaire. In tests conducted by Lesser, et al (1999), including a $2 incentive in a mailing with four contact points was shown to increase response rates by an additional 19 to 31 percentage points. Thus, even a small upfront incentive typically is more cost effective than additional follow-up steps that are often considered.

To encourage participation in the mail survey, one of three honorarium amounts will be provided to the participants in the initial mailing. Statistical tests of differences in response rates associated with upfront respondent incentives of $2, $5, and $10 conducted during a pilot pretest implementation for the Steller sea lion economic survey (conducted under OMB Control No.: 0648-0511) indicated that a $10 incentive led to a statistically higher response rate compared to the $2 and $5 treatments at the 1% and 10% levels, respectively.[5] *The $10 incentive was the only one to achieve a response rate over 50% (57% compared to 35% for $2 and 49% for $5), which will be critical to make the results more defensible in the professional peer review process.* Actual implementation of the final version of that survey (conducted under OMB Control No.: 0648-0554) using a $10 upfront incentive resulted in a response rate of over 70% for an Alaska household sample and 60% for a rest of U.S. household sample. In this formal pretest, we will test three incentive amounts to determine whether lower incentive amounts lead to statistically similar response rates for this particular survey, which may allow for cost savings in the full implementation over using a $10 incentive that proved effective in the Steller sea lion economic survey. The upfront respondent incentives to be tested in this survey are $1, $5, and $10, each of which will be provided to equal-sized samples (one-third of the overall sample).

There are several reasons why we believe inclusion of both a financial incentive and follow-up contacts will be needed to reach desired response rates. First, the survey is about an unfamiliar issue to many Americans. As such, the chance that respondents will not be motivated to complete the survey is higher than for a survey on a more familiar subject (such as a survey of licensed anglers about managing local fishing sites). Second, although every attempt is being made to ensure the survey is easy to read, understand, and complete, the amount of information it needs to present and the number of questions it needs to ask contribute to a 16 page survey requiring more respondent attention than some surveys. For these reasons, and because of the survey protocols followed and resulting response rates for the Steller sea lion economic survey

[5] In fact, the statistical tests of differences between the response rates of the three treatments suggest that the $5 treatment and $10 response rates are significantly larger than the $2 treatment, with corresponding p-values of 0.00235 and 0.000281, respectively (for a one-sided statistical test with a null hypothesis of equal response rates). In addition, the $10 treatment response rate is statistically different from the $5 treatment response rate at the 10% level (p-value of 0.0711).

that used a similar survey instrument, we expect both incentives and follow-up contacts will be required to obtain a suitable response rate.

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

In the cover letter accompanying each mailing, respondents will be told that their name and address information will be kept separate from their responses and that only their responses will be given to researchers. The cover page of the survey will also include the following statement (not on attached survey's cover page, but will be added with the OMB Control Number following OMB approval):

> 'Your name and address will be kept separate from your responses, and only responses will be delivered to researchers for analysis.'

Following completion of the data collection, the survey firm will delete any information identifying individuals (i.e., name and addresses) before any data file is delivered to NMFS or any other participating researchers and agencies.

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.

There are no questions of a sensitive nature asked in the survey.

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

The pretest mail survey will be sent to a random sample of approximately 600 addresses. The random sample will be purchased from a professional sampling vendor.[6] Based on previous experience, up to 15% of these types of samples can be expected to be bad or unusable addresses, which means the number of households receiving the survey will be approximately 510. We expect a final response rate of at least 60 percent (of the valid sample), leading to over 306 (= 510 × 0.60) responding households returning completed surveys (for the purpose of computing burden hours, we assume no more than 320, 256 completed from the initial mailing and postcard reminder and 64 completed following the second full mailing and contact via phone). The cover letter will solicit the participation of an adult head of the household to complete the survey. Our experience suggests respondents typically complete the survey in 20 to 25 minutes, so we assume 25 minutes in our computation of the potential burden hours. As a result, those ultimately completing the survey are expected to contribute up to 133 hours to the overall hour burden.

[6] For the purpose of the pretest, the variations in samples from different vendors will have little influence on the results with respect to the objectives of the pretest. During the review and pretest period, additional data will be collected to evaluate vendors for the final survey. Candidate vendors for the pretest and final survey include Acxiom, Experian, Survey Sampling Int'l, and Genesys, all of whom are high quality vendors with high population coverage rates (85% to 95%), but which vary in the methods used to assemble lists and in the percent of their population with telephone numbers.

Following the initial mailing and postcard, we expect approximately 80% of expected completes or 256 households to have returned completed surveys (based on results from Steller sea lion economic survey). Households that have not responded after the initial mailing and postcard reminder will be contacted by telephone and encouraged to complete and return the survey or asked to answer a few questions if they indicate they will not be returning the survey. Thus, the telephone follow-up serves the dual purpose of increasing the number of mail responses and gathering information by telephone needed to estimate the impact of non-response. Households that need a replacement questionnaire will be identified and sent a new one. The phone interview is expected to take 5 minutes on average to complete, and we expect to attempt to reach and complete interviews with up to 36% of the 510 potential respondents, or up to 184 individuals, for a total of approximately 15 burden hours (184 × 5 min).[7]

Following the telephone prompts, a second full mailing will be attempted. This will not result in any additional burden hours (included in burden hours from completed and returned surveys).

The total number of unique respondents to all survey contacts will be 440 (320 from mail survey plus an additional 120 who only complete the short telephone interview). This number consists of respondents who return the questionnaire (320) and respondents who do not return the questionnaire but do provide some survey information during the telephone contact (120).

Survey instrument	**Estimated number of respondents**	**Estimated number of responses**	**Estimated time per respondent (minutes)**	**Estimated total annual burden hours (hours)**
Mail survey (from initial mailing and postcard reminder)	256	256	25	107
Mail survey (returned after phone contact and follow-up full mailing)	64	64	25	27
Follow-up phone survey	184[a]	184	5[c]	15
Total respondents	440[b]	504		149

[a] Number of successful phone contacts of households that have not returned completed surveys following initial mailing and postcard reminder.

[b] Total respondents reflect the total sample size minus the households that do not complete either the mail survey or phone interview.

[c] This average time includes time for those who provide survey information.

[7] Although we will attempt to reach all households in the sample that have not returned a completed survey to this point, we do not expect to be able to reach more than 184 in a timely and affordable manner.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

No additional cost burden will be imposed on respondents aside from the burden hours indicated above.

14. Provide estimates of annualized costs to the Federal government.

Annual cost to the Federal government of the pretest is approximately $25,000 divided as follows: $15,000 in contract award money and $10,000 in staff time and resources. Contractor services include conducting the pretest implementation.

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

This is a new collection.

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

Internal memoranda and supporting materials will be prepared that document the sampling procedures and response rates, provides statistical summaries (i.e., means, variances, and frequency distributions) of data collected in the survey, and preliminary analysis that will be used to aid in the design of the final experimental design and in improving the survey design. These materials will not be published.

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.

This item is not applicable, as the expiration date for OMB approval of the information collection will be shown on the survey.

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

There are no exceptions.

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