SUPPORTING STATEMENT
COMPREHENSIVE SOCIOECONOMIC DATA COLLECTION FROM ALASKAN COMMUNITIES
OMB CONTROL NO. 0648-XXXX

A. JUSTIFICATION

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

This is a request for a new information collection.

Various federal statutes, including the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and the National Environmental Policy Act (NEPA), among others, require agencies to examine the social and economic impacts of policies and regulations. National Standard 8 of the MSA specifically states that communities need to be considered when changes in fishing regulations are made, requiring that we "take into account the importance of fishery resources to communities" in order to provide for communities' sustained participation in fisheries and to minimize adverse economic impacts on fishing communities. Thus, the study of the 'human dimensions' of marine ecosystems and fisheries has been implemented over the last several years with the addition of social science staff within National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS). This addition has proven NMFS's commitment to understanding how people fit into marine resource management systems and has been followed by an increased effort to systematically collect data related to the human dimensions of marine resource use.

As part of this commitment and legal mandate, in 2005, the Economic and Social Science Research Program (ESSRP) of the Alaska Fisheries Science Center (AFSC) published *Community Profiles for North Pacific Fisheries – Alaska* (Sepez et al 2005). This document profiles 136 fishing communities in Alaska, providing basic information from the year 2000 on social and economic characteristics for each community. Given the wide range of users that rely on the profiles to make decisions about fisheries management in Alaska and that the information presented in the profiles is now over 10 years old, it is imperative that the information be updated and improved to reflect the current links between communities and fisheries, to best support the decision making process.

To begin the profile update process, ESSRP social scientists held community meetings in August and September 2010 in six regional hub communities (Anchorage, Unalaska/Dutch Harbor, Bethel, Nome, Petersburg, and Kodiak) to solicit community member input on how the community profiles can be better representative of the communities and their ties to Alaskan fisheries. In the process of holding the community meetings, a variety of relationships were forged between ESSRP team members and community representatives, who expressed a desire to be more intimately involved in the process of providing feedback on the profiles[1]. Much of the input received at the community meetings consisted of suggestions for new types of data that

[1] As a result of this request, ESSRP plans to send each community a copy of their revised profile in the event they would like to comment on the information included or add additional information about their community

should be included in the revised community profiles, to better represent the interests of communities in the fisheries management process. However, a large amount of the data requested by communities for inclusion is not obtainable from other sources other than directly from the communities themselves.

Furthermore, much of the existing economic data about Alaskan fisheries is collected and organized around different units of analysis, such as counties (boroughs), fishing firms, vessels, sectors, and gear groups. It is often difficult to aggregate or disaggregate these data for analysis at the individual community or regional level. In addition, at present, some relevant community level economic data are simply not collected at all. The NPFMC, the AFSC, and community stakeholder organizations have identified ongoing collection of community level economic and socio-economic information, specifically related to commercial fisheries, as a priority.

As a result of this information and the requests at the 2010 community meetings, the proposed data collection will provide systematic annual data over the next 10 years for the socio-economic impact assessment of communities involved in North Pacific fisheries and will ensure that both commercial fisheries data and community level socio-economic and demographic data are collected at comparable levels over space and time. Such data will facilitate analysis of regulatory impacts on communities and commercial, recreational, and subsistence fisheries, and proposed changes in fisheries management, both within and across North Pacific communities involved and engaged in fishing activities.

The types of data that will be collected from communities include those based on recommendations from community representatives that participated in our community meetings and a subset of those which have been identified by the Comprehensive Socioeconomic Data Collection Committee of the NPFMC in the document titled *Comprehensive Socioeconomic Data Collection for Alaskan Fisheries: Discussion and Suggestions*, and represent the most important data to obtain from communities. This includes information on community revenues based in the fisheries economy, population fluctuations, fisheries infrastructure available in the community, support sector business operations in the community, community participation in fisheries management, and effects of fisheries management decisions on the community. This data collection will capture the most relevant and pressing types of data needed for socio-economic analyses of Alaskan communities. Given that the collection of most of the data in this survey was directly requested by fishing communities for inclusion, the project has a high level of support from the pool of potential respondents and is expected to result in a higher than average response rate.

In the MSA, Sections 301 and 303, the National Environmental Policy Act (NEPA), and Executive Order 12898, NMFS is required to provide social, cultural, and economic analyses of Federal management actions and policies to improve the Nation's fisheries. This data collection effort will meet these statutory and administrative requirements by providing resource managers with the information necessary to understand how new fisheries regulations could impact Alaskan fishing communities.

MSA

The following sections of the MSA pertain specifically to the requirements needing social and cultural data. Data collected in this effort will support current and future requirements.

1) National Standard 8 Sec 301 (a)(8) states:

   Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

2) Requirements for Limited Access Privileges Sec.303A. (c) (1) (C) states:

   … any limited access privilege program (LAPP) to harvest fish submitted by a Council or approved by the Secretary under this section shall promote:
   … (iii) social and economic benefits.

3) Sec. 303A (B) PARTICIPATION CRITERIA – *In developing participation criteria for eligible communities under this paragraph, a Council shall consider -*
   (i) traditional fishing or processing practices in, and dependence on, the fishery;
   (ii) the cultural and social framework relevant to the fishery;
   …(iv) the existence and severity of projected economic and social impacts associated with implementation of limited access privilege programs on harvesters, captains, crew, processors, and other businesses substantially dependent upon the fishery in the region or subregion;

4) Sec. 404(a) refers to:

   …..acquire knowledge and information including statistics, on fishery conservation and management and on the economic and social characteristics of the fishery.

   The act clarifies this in Sec 404(c) (3) indicating

   Research on fisheries, including the social, cultural, and economic relationships among fishing vessel owners, crew, United States fish processors, associated shoreside labor, seafood markets and fishing communities.

To achieve the goals, NMFS and the councils that ultimately manage commercially utilized marine resources require a clear understanding of the stakeholders involved in this process. In order for social science to best inform policy and meet the legal requirements of MSA, scientists

working for NMFS must be able to carry out research like that proposed for this project in a timely fashion so that it can be utilized to inform management decisions.

NEPA

NEPA requires Federal agencies to consider the interactions of natural and human environments, and the impacts on both systems of any changes due to governmental activities or policies. This consideration is to be done through the use of 'a systematic, interdisciplinary approach that will ensure the integrated use of the natural and social sciences . . . in planning and in decision-making. . .' (NEPA Section 102(2)(A)). Under NEPA, an Environmental Impact Statement (EIS) or Environmental Assessment (EA) is required to assess the impacts on the human environment of any federal activity. NEPA specifies that the term 'human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment' [NEPA Section 102 (C)].

Under this Federal mandate, NMFS must address the effects on the human environment of any action, including the approval of fishery management plans. It must also evaluate a series of alternatives in terms of the potential social impacts of such actions. The cumulative impacts of Federal actions must also be taken into account. In order to improve the current level of information used by the councils to produce these assessments, NOAA social scientists need to collect qualitative and quantitative data, such as that proposed in this data collection, which will allow us to evaluate impacts of approved fisheries management programs over time.

Executive Order 12898

The Executive Order 12898 of February 11, 1994 on Environmental Justice requires Federal agencies to consider the impacts of any action on disadvantaged, at risk and minority populations. To evaluate these impacts, information about the vulnerability of certain stakeholders must be better understood. Indicators of vulnerability can include, but are not limited to income, race/ethnicity, household structure, education levels and age. Although some general information related to this issue is available through census and other quantitative data, these sources do not disaggregate those individuals or groups that are affected by changes in marine resource management or the quality of the resource itself. Therefore, other types of data collection tools must be utilized to gather information related to this executive order.

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.

Information from this collection will be used by NOAA social scientists at the AFSC and Alaska Regional Office, and by staff at the NPFMC, to meet the requirements of the regulations discussed in Part A, Question 1 above. The information sought will be of practical use, as NOAA social scientists will utilize the information for descriptive and analytical purposes. The results of the research will also be available for use by the NPFMC, in their role in fisheries management. In addition to direct fisheries management utility, this research and the resultant

data may be utilized in increased and future ecosystem management efforts. These efforts include the development of various ecosystem models which incorporate various socio-economic indicators and other social information. The results of this research will increase the availability of social data to the extent that it may significantly benefit new research efforts in ecosystem modeling. The principle form of the results of this collection will be an update to the *Community Profiles for North Pacific Fisheries – Alaska* document (Sepez et al 2005) and will be supplemented by data from existing sources (e.g., 2010 U.S. Census, Alaska Commercial Fisheries Entry Commission, Alaska Department of Fish and Game, National Marine Fisheries Service Restricted Access Management Division, and Alaska Division of Community and Regional Affairs). The updated profiles and the results of this data collection will also be available for public use to support community development, other research concepts and future research design.

The data will be collected on an annual basis in order to show any changes in the data over time. The frequency of the use of the data is unknown at this time and is dependent on the regulatory actions required in the future as well as public use. With that said, as this type of data has been historically unavailable, it is expected that the availability of this type of information will have high utility both for fisheries managers that are mandated to undertake socio-economic impact analyses of potential regulations, and by Alaskan fishing communities themselves in understanding their own dependence on fishing and socio-economic structure.

The primary data collection tool is a survey instrument. The survey instrument will collect social and economic information at the community level, which are currently unavailable. This information will be collected from the city and tribal government offices of each community. The goal of the survey instrument is to provide information on the importance of fishing to communities in Alaska to be included in the updated community profiles. Aggregate data from the survey instrument can be used to describe demographics of Alaskan fishing dependent communities, fishing related businesses, and the importance of fishing to various regions of Alaska. The information may be used to give communities a voice in the decision making process. The survey instrument was designed after conducting secondary research to determine what needed data are not already available, consulting with experts in survey research design, and conducting in-depth cognitive interviews with interested community members to test the survey instrument and to ensure that all of the questions are clear and can be answered easily by the respondents. The survey instrument is designed to provide community-specific information by inserting the community name into the questions to make it clear to the respondent which community they are being asked about. The following is a discussion of how individual questions in the survey instrument will be used.

- Q1 collects information about how many people live the community as year round residents, as seasonal workers or transients, and as year round residents that work in a shore-side processing plant. The U.S. Census does not differentiate between residents that live in a place year round or that are seasonal residents. The data collected in this question will facilitate an understanding of the difference between the types of residents in terms of reliance on social services and participation in civic activities.

- Q2 provides information on which months per year seasonal workers live in the community. The ebb and flow of seasonal worker residents can have a strong impact on the population of a given community. The information collected from this question will assist in understanding the link between the peaks and troughs in fisheries participation and temporal impacts of fisheries management decisions on the social structure of a given community.

- Q3 requests information on the length of the fishing season(s) that residents of the community participate in. The information gathered from this question will be used to facilitate an understanding the temporal effect fishing has on a given community, economically, culturally and socially.

- Q4 asks for the month(s) that the community's population reaches its annual peak. Responses to this question will be used to map out the population over time and determine what months of the year will have the largest burden on civil services.

- Q5 is used to determine the degree the community's annual peak in population is driven by employment in the fishing sector. Responses to this question will be used to map out the population over time and determine what months of the year will have the largest burden on the fishing-related infrastructure and support services.

- Q6 collects information about the infrastructure available in the community and whether it was completed in the last 10 years, is currently being constructed, is planned for completion in the next 10 years, and the year of completion. Representatives from Alaskan fishing communities have indicated that the availability of local infrastructure is imperative for the sustained existence of a given community. The information collected in this question will be used to respond to this request and as an indicator of vibrancy and resiliency of a given community and the quality of economic performance of a local fishery.

- Q7 and Q8 provide information on the availability of public dock space for moorage of permanent and transient vessels (Q7) and the maximum length of vessels that can moor in the community (Q8). Responses will be used to assess the capacity of each community to host fishing vessels and generate revenue from public moorage facilities. If the availability of moorage space changes over time, this could be an indicator that something is happening to local participation in fisheries.

- Q9 requests information about the annual revenue that public moorage facilities earned in the previous calendar year. Responses will be used as a quantitative indicator of vessel transit activity and revenue generation from public moorage facilities for each community. This source of public revenue can directly feed into the community's municipal finances and be earmarked as a direct benefit of fishing to the community. As a result, changes in fisheries management could have an effect on municipal finances if moorage revenue goes down from fewer or smaller vessels utilizing public moorage facilities. This type of information will be used to assist in the analysis of impacts of proposed fishing regulations or allocations that are based on vessel size.

- Q10 is used to determine the types of regulated vessels that the community's port is capable

of handling. Responses will be used to describe the non-fisheries fleet activity in a community. This type of information will be used to measure the resiliency of communities in the face of changes in fisheries management and with regards to the diversity of the economic base that supports the port services. This is important in looking at the amount of moorage space available as regulated vessels could account for a high level of dock space available when fishing is not heavily present in a community.

- Q11 collects information on the types of commercial fishing boats that use the community's port during the fishing season as their base of operations. Responses to this question will be used to assist in describing the local fishing fleet's contribution to the local economy. The home port listed on the vessel registration most often does not reflect where the vessel is based during the fishing season, and thus to which local economy the vessel is contributing to during the fishing season. Since there are no known records of which fishing vessels use which communities as their base of operations and since it would be too onerous to ask harbormasters or community officials to list out which vessels use their community in a given year, the data from the questions in this survey with regards to a community's capacity to host commercial fishing vessels will be used to form assumptions about the effect commercial fishing has on a community's economy. In addition, the capacity of a community to host certain sizes of vessels will be used as an indirect multiplier of what effects fisheries management actions based on size class might have.

- Q12 and Q12a provide information about the trends in the number of different types of vessels that are based in the community compared to five years ago. The responses to this question will be used as one method of tracking the trends of the local vessel types over time.

- Q13 and Q14 ask for the type of recreational or sport fishing that occurs in the community (Q13) and the saltwater species that are targeted (Q14). The information collected from this question will be used to describe the presence of recreational fishing in each community so that a community's dependence on recreational fishing can be determined.

- Q15 is used to determine the types of fishing gear used by commercial fishing vessels based out of the community. This question will aid in describing the effects of fishing regulations that are based on fishing gear type per community and describing the commercial fishing fleet that uses each community during the fishing season.

- Q16 collects information about the types of fishing support businesses located in the community. The information collected from this question will be used to provide insight into how each community contributes to fishing both locally and regionally. The hypothesis is that changes to services in a regionally important community hub will have a multiplier effect in that they will affect not only their own community but also all of the satellite communities that rely on the services in the hub to keep fishing operations active. This question will also aid in determining the social organization of remote communities in Alaska by identifying which communities serve as service hubs for fishing.

- Q17 provides the location(s) of the communities that local residents go to for fishing support businesses that are not located in the community. The communities provided as answers to

this question will be used to provide insight into which communities are considered hubs for fishing related services in a given region.

- Q18 asks for information about the public social services that are available in the community. This question will be used to discern which public social services exist are available both to residents and individuals that might be stranded in the community.

- Q19 requests information about the natural resource-based industries that the community's economy relies on. The results of this question will aid in understanding the diversity of each community's economy and natural resources that a given community might have to support itself in the event that fishing does not bring in adequate money or food. In addition, this data will be used to evaluate the resiliency of a community's economy and alternate sources of jobs.

- Q20 is used to determine the three most important subsistence marine or aquatic resources the residents of the community rely on. The Alaska Department of Fish and Game (ADF&G) does not undertake subsistence harvest surveys on an annual basis. The results of this question will be used to gain an understanding of what aquatic resources a community might rely on for subsistence purposes. In general, communities have expressed concern that not enough data is collected on the subsistence activities of Alaskan communities. The purpose of this question is to document that subsistence harvesting is important to communities and will be used to show differences between the subsistence resources that communities rely on in different regions of the state.

- Q21 and Q22 collect information about funding or grants that the community received from Community Development Quota entities and from fisheries-related taxes or fee programs in the previous calendar year. The results from this question will be added to all other known community revenue streams to determine the total amount of revenue that a community receives related to fishing related activity. This data will be used to understand the total benefit that a community receives from fishing and assist in understanding how positive or negative changes to this revenue stream from fisheries management decisions might affect a community's ability to provide community services. In addition, each revenue stream type will be converted to a percentage of the total municipal budget in order to determine its strength as an indicator of a community's dependence on fishing.

- Q23 asks for information about the community's public services that are at least partially funded by a local raw fish tax, the state Shared Fisheries Business Tax, the state Fisheries Resource Landing Tax, or marine fuel sales tax. The responses will be used to understand which community services are dependent on fisheries-related revenue, and thus which community services might be affected by changes in revenue caused by fisheries management decisions.

- Q24 and Q24a request information about additional local fishing-related fee programs charged to the fishing industry that specifically support public services and infrastructure. The responses will be used to determine local fishing related revenue streams that might be affected by fisheries management decisions. Community representatives have been

requesting for years that fisheries managers take into account such municipal fee programs that are susceptible to changes in fishing activities and incorporate potential impacts to those revenue streams into socio-economic impact analyses for potential fisheries management changes. The results of this question will be used to direct analyses of this type of impact.

- Q25 and Q25a are used to determine how the community participates in the fisheries management process in Alaska. Since this data collection will happen on an annual basis, the results will be used to understand the level of participation that a community has in fisheries management as data from each year is collected. It is hypothesized that the more ways and professionalized a community's participation is in these processes; the more likely their local concerns are to be considered in the fisheries management process. An individual conducting a socio-economic impact analysis needs to understand which communities do not participate as much so that their impact analysis can pay particular attention to those communities that might be least able to represent themselves. The importance of community participation in fisheries management was brought up as a significant concern at the community profile update community meetings as something that communities want fisheries managers to understand about them.

- Q26-29 collect information about the current challenges for the portion of the local economy that is based on fishing (Q26), the effects of fisheries policies or management actions on the community (Q27), the past or current fisheries policy or management action that has affected the community the most (Q28), and the potential future fisheries policy or management action that concerns the community the most. The responses will be used to understand what fisheries management issues are most important to and are affecting each community from their perspective and to qualify the cumulative effects of fisheries management actions in compliance with NEPA.

- Q30 provides information on the individuals in the community that contributed to filling out the survey. The responses to this question will be used to analyze the likely representativeness of the subjective questions included in the survey.

- Q31 asks for any additional information that the respondent would like to provide NOAA and the AFSC about how the community is engaged in or affected by fisheries. The responses to this question will be used to identify any additional issues that communities have with regards to their involvement in fishing that were not addressed in the survey but that they would like AFSC to understand and know about.

An advance letter will be sent out explaining the data collection to potential respondents. In addition, telephone contact will be made with each potential respondent to recruit participation and provide further information about the importance of their response. Following an initial mailing of the survey and postcard follow-up, we will contact non-respondents by telephone o 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-

[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.

respondents can be compared with that from respondents to address issues concerning non-response bias. Publically available information about each community will be used to statistically test whether non-respondent communities differ from respondent communities with respect to socio-economic demographics. This information can be used to evaluate and adjust the results for potential non-response bias among sample members.

It is anticipated that the information collected will be used by the NPFMC to inform decision making, 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 anonymity, 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 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.

The survey data collection does not utilize any specialized information technology.

4. Describe efforts to identify duplication.

NMFS social scientists and contractors work closely with regional academics, community based organizations, industry groups, and other parties interested in this type of information. Reviews of existing information are common practice when initiating social science studies. A thorough literature review has identified where similar studies have been initiated and will ensure that efforts are not duplicated. The information collected in this survey is not collected by other Federal, state, or local agencies. We have informed the NPFMC, the NMFS Alaska Regional Office, and the Alaska Division of Community and Regional Affairs about this project. None of these entities have conducted or are conducting similar economic data collections

An overall strategic research plan will also guide this process and ensure that all data collected is relevant, new, and essential for achieving NMFS social science goals. Research conducted in the Alaska community profiling project (Sepez et al 2005) will be utilized as a source and guide for information to support this effort. As stated previously, these profiles will be updated with 2010 information once the U.S. Census data is released for 2010. Although the data currently included in the original profiles provides a very important baseline for Alaskan fishing communities, it is missing key socio-economic indicators specific to the fishing dependence of the communities profiled. The proposed data collection is necessary to fill this void in the 2010 revised profiles, and to address communities' preferences for improving the community profiles and having their voices heard by the NPFMC, NMFS, and AFSC.

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

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

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

Without current information on the involvement in fishing and importance of it to Alaskan communities, NMFS and the NPFMC will be unable to adequately understand impacts of fisheries policy and management decisions on Alaskan communities, particularly those who do not regularly attend public meetings, but are nonetheless affected by the decisions.

The federal mandates and executive orders described in Part A, Question 1 above require the analysis of the impacts that government actions have on the individuals and communities involved in fishing and marine resource related activities. Socio-economic impact assessments, analysis of the affected human environment, cumulative impacts, as well as the distribution of impacts with a special emphasis on vulnerable or at risk communities, are all examples of these requirements. The ability of NOAA Social Scientists to adequately respond to this charge rests on access to timely and relevant information about the stakeholders involved.

A significant concern related to the quality of these analyses is the risk of being vulnerable to litigation for not fulfilling these mandates and executive orders. Therefore, not collecting this information may lead to incomplete representation of the communities affected by fisheries policies and management decisions in Alaska. This could impact the decision making process and negatively impact the communities subject to the decisions.

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

The data collection will be 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 September 28, 2010 (75 FR 59687) solicited public comment on this proposed information collection.

One comment was received that expressed concern that the proposed data collection was only aimed at fishing communities in Alaska and did not include fishing communities in Washington and Oregon that are responsible for the majority of fishing in Alaska and did not account for the

benefits that Alaskan communities receive from the Western Alaska Community Development Quota (CDQ) Program. An email response explained that NMFS' Northwest Fisheries Science Center published profiles for communities in Washington and Oregon with the information requested and that data regarding the CDQ Program already exists and does not need to be collected again by this proposed data collection.

Several individuals outside AFSC were consulted about elements of the survey, availability of existing data, data to collect, and other aspects of the project. These included staff at the NPFMC, NMFS Alaska Regional Office, and the Alaska Division of Community and Regional Affairs who have experience collecting data about Alaskan fisheries and working with fishing communities in Alaska.

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

There are no plans to provide any payment or gift to respondents.

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

The questionnaire has been designed in a manner to keep the information provided anonymous and asks respondents about a specific community or tribe rather than about themselves. No personally identifiable information is included on the questionnaire. The questionnaire will contain code numbers that will be associated with the community or tribe being asked about rather than the respondent. Respondent names will be kept in a separate document, not linked to the survey proper. Respondent names are being kept for the purpose of avoiding duplication of survey respondents. In the cover letter accompanying each mailing, respondents will be told that their responses are voluntary and will be kept anonymous. The cover page of the survey will also include the following statement:

> Your participation in this survey is voluntary. All responses are anonymous.

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.

Only one area of the survey contains issues of a potentially sensitive nature that will be explored. This is listed and discussed below.

1. Business Information: Survey questions inquire about business characteristics of the communities being surveyed. These questions are necessary to understanding each community's involvement in fishing. None of the business information requested in the questionnaire can be linked back to the financial characteristics of individual businesses.

12. <u>Provide an estimate in hours of the burden of the collection of information</u>.

A total of approximately 521 burden hours will be accumulated from the full survey implementation. The survey will be sent to representatives of 250 Alaskan fishing communities, composed of the 136 communities that were profiled in the 2005 *Community Profiles for North Pacific Fisheries – Alaska* and the remaining 114 populated communities involved in commercial fishing that were considered for inclusion in that document, but did not meet the selection criteria (Sepez et al 2005) for inclusion in the study. The survey will be sent to the city or village office and the office of the village council, for a total of 500 potential respondents. Where known, the survey will be directed to a specific person (i.e., mayor, city manager, or village council president) to facilitate completion and mail it back. To be conservative, we will assume that addresses for local government offices will not change, which means that the number of respondents receiving the survey will be 500.

In general, a response rate of 60% is expected for mail surveys sent to the general population (Salant and Dillman 1994, pp. 43-44; Rea and Parker 2005, pp. 9-11; Dillman et al 2009, pp. 59). As part of the editing process for the 2005 community profiles (Sepez et al 2005), all 136 communities were sent a draft of their respective profile for review and comment. Only 15% of community contacts returned their profile with comments. However, for that project, no advance letter was sent and no follow up was done. Based on this experience, given the highly specialized nature of the sample population for this study, and the fact that we have received a significant amount of buy-in from members of that population for this survey, we expect a final response rate of at least 70%, and potentially up to 90%, leading to between 350 and 450 surveys being returned.

We expect approximately 45% of the population to have returned completed surveys following an advance letter, telephone recruitment call, initial mailing and postcard reminder, including 30% from the initial mailing and 15% from the postcard reminder, or 225 returned surveys. Past experience with Alaskan fishing community representatives has shown that telephone contact is the most effective method to get their specific input, hence the inclusion of a telephone recruitment call to increase potential response rate before the initial mailing is sent out. In addition, we expect that a follow-up telephone contact will account for up to an additional 25% response rate, or 125 returned surveys. The follow-up telephone contact serves to increase the number of mail responses as well as gather information by telephone needed to estimate the impact of non-response. Community representatives that need a replacement questionnaire will be identified and sent a new one.

For the purpose of receiving approval for an adequate ceiling of burden hours, we assume that no more than 450 or 90% of potential respondents will complete the survey. In addition, while cognitive interviews showed that individual surveys can be completed in 45 minutes, we assume that the survey will take one hour to complete. As a result, those ultimately completing the survey are expected to contribute up to 450 hours to the overall hour burden, 290 from the initial mailings (58% of potential respondents) and 160 from the follow-up phone contact (32% of potential respondents). Additional burden hours are expected from the telephone recruitment call with all 500 potential respondents and follow-up telephone contact with the 210 potential respondents that have not yet completed the survey. Given that phone numbers for municipal

and tribal offices are publically available on the internet, we expect that attempts will be made at contacting all potential respondents. To be conservative, it is assumed that all of the potential respondents will be reached. Both the telephone recruitment call and the follow-up telephone call are expected to take six minutes on average to complete. As a result, the telephone recruitment call will contribute approximately 50 hours of burden and the follow-up phone contact approximately 21 hours of burden.

Description	Estimated No. of Respondents	Estimated No. of Responses	Estimated Time per Respondent (minutes)	Estimated Burden Annual Burden Hours (hours)
Initial telephone recruitment	500	500	6	50
Mail survey (from initial mailing, postcard reminder, and full follow-up mailing)	290	290	60	290
Follow-up telephone survey	210[a]	210	6	21
Mail survey (from follow-up telephone contacts)	160	160	60	160
Total Burden	**500 (unduplicated)**	**1,160** [b]		**521**

[a] This assumes that 100% of respondents that have not returned completed surveys following initial mailing and postcard reminder will be reached by phone.

[b] Total responses reflect the total number of respondents that complete the mail survey plus the total number of respondents that are contacted by phone.

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

There will be no reporting or recordkeeping costs to the respondents. Surveys will be mailed with pre-paid postage envelopes enclosed.

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

Total estimated annual cost to the federal government is $55,000, divided as follows: $40,000 in contract award money and $15,000 in staff time and resources. Contractor services include final survey implementation, entering and cleaning the data, and preparing a report that documents the survey procedures and response rate. Survey design, data collection and processing, and report development will be conducted by both NMFS federal staff and a contractor.

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

This is a new collection.

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

A report describing the sampling methods, experimental design, response rates, and descriptive statistics of data collected will be prepared. The data will be principally published in a revised version of the *Community Profiles of the North Pacific Fisheries – Alaska* document (Sepez et al 2005). In addition, a separate paper describing how the survey data was analyzed and the results from the data will be submitted to a peer-reviewed journal to disseminate the findings. Where possible and relevant, final reports and other relevant portions of the research process will be posted on the appropriate Web site and/or presented at professional conferences.

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 on the survey.

18. Explain each exception to the certification statement.

No exceptions are noted.