

**SUPPORTING STATEMENT  
ALASKA RECREATIONAL CHARTER VESSEL GUIDE AND OWNER DATA  
COLLECTION  
OMB CONTROL NO. 0648-XXXX**

**A. JUSTIFICATION**

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

The National Marine Fisheries Service (NMFS) is the agency responsible for collecting and analyzing scientific data on the United States' (U.S.) living marine resources, including Alaska halibut. Under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (see Section 303), [Executive Order 12962](#) (Marine Recreational Fishery Statistics, Section 1(h)), and [Executive Order 12866](#) (Section 1(b)(6)), NMFS is required to provide economic analyses of Federal management actions and policies to improve the Nation's fisheries. This data collection project will meet these statutory and administrative requirements by providing resource managers with the information necessary to understand the likely future impacts of management actions on the Alaska charter boat-based halibut sport fishery.

The halibut sport fishery in Alaska is quite large. During 2009, for instance, over 440,000 halibut were harvested by sport anglers in the state.<sup>1</sup> In recent years, several regulatory changes have occurred and more have been proposed that could significantly impact the sport fishery, particularly the charter boat industry that facilitates much of the halibut sport fishing trips in the state. In February 2011, a program was implemented to limit entry into the saltwater charter boat recreational fishery in Alaska (75 FR 554). This policy sets a limit on the number of charter vessels that may participate in the guided sport halibut fishery in U.S. waters off Alaska. The limited entry program is separate from other policies intended to regulate harvest of halibut by the guided fishing sector, such as the guideline harvest limit (GHL) policy established in 2003 that sets an acceptable limit on the amount of halibut that can be harvested by the recreational charter fishery during a year and establishes a process for the North Pacific Fishery Management Council (Council) to initiate harvest restrictions in the event that the limit is met or exceeded. At present, numerous harvest restrictions have been adopted by the Council to address exceedances of the GHL that have occurred in recent years. These restrictions have primarily been aimed at limitations on fishing in the charter boat industry, such as restrictions on client or crew fishing behavior (e.g., bag and size limits). This year, maximum size limits for halibut caught on charter boat fishing trips were adopted. Moreover, NMFS and the Council are currently assessing a plan to implement a catch sharing plan to allocate halibut between the recreational and commercial sectors that would replace the GHL system (76 FR 14300). To assess the effect of regulatory restrictions (currently in place or potential) on Alaska charter boat fishing operator behavior and welfare, it is necessary to obtain a better general understanding of the industry. Some information useful for this purpose is already collected from existing sources, such as the State of Alaska's charter logbook data program. However, information on vessel and crew

<sup>1</sup> From Alaska Department of Fish and Game's Statewide Harvest Survey website: <http://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=region.home>. Accessed June 28, 2011.

characteristics, services offered to clients, spatial and temporal aspects of their operations and fishing behavior, and costs and earnings information are generally not available from existing data sources and thus must be collected directly from the industry through voluntary surveys.

**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 NMFS economists and social scientists in the Alaska Fisheries Science Center (AFSC) and Alaska Regional Office, and by staff at the Council, to address issues discussed in Question 1 above, and others that may arise. Using these data, analyses will be conducted to describe the charter industry, its value, and its economic impact on the regional and national economy, as well as assess the effects of regulatory changes in support of efforts to develop, implement, and monitor fishery management plans.

The information collection consists of conducting an annual survey sent to all licensed charter businesses who offer saltwater fishing trips in Alaska. That is, the survey will be conducted as a voluntary census. For this implementation, we will mail questionnaires to all licensed charter businesses, with follow-ups to encourage response. Among the follow-up efforts will be a postcard reminder, a telephone contact with non-responding charter businesses to encourage response and gather data for assessing non-response behavior, and a full second mailing. Respondents will also be given the option of filling out the survey on-line at a secure website. Due to issues of timing sensitivity discussed below, and the need for the first year of responses to be collected for the 2011 season, we do not anticipate being able to conduct a formal pretest to test the mail survey instrument.<sup>2</sup>

The charter boat fishing season in Alaska generally runs from mid-May through mid-September. After numerous discussions with charter boat operators, it was determined that April is the best month for collecting the type of information sought in this data collection. *Since the survey collects information about the previous year's activities, much of which is calculated as part of the businesses' tax preparations, it was determined that conducting the survey in April will maximize the probability that respondents will have access to the information being collected, and thus would minimize the burden on them by reducing the need to start those calculations earlier than they normally would for tax season.*

The mail survey and the follow-up telephone interview script are described below. The web-based survey is based on the mail survey, asking the same questions, but formatted to be presented and filled out on line. As a result, it will not be discussed separately. Moreover, the

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<sup>2</sup> Due to the limited window for maximizing response rates, conducting a full formal pretest would push the full implementation back a season and issues currently in front of the Council and NMFS require understanding the information this data collection intends to provide.

survey instruments are configured for collecting data for the 2011 season, but surveys for 2012 and 2013 are expected to be identical and therefore are not included.

### **Mail/Web-based Questionnaire**

The questionnaire is divided into six sections. The following is a discussion of how particular questions in the questionnaire will be used.

Section A is short and asks for information that identifies the respondent's charter business to enable linking the information collected in this survey to supplemental data on fishing trips (catch, number of clients, dates of trips) collected in ADF&G's charter logbook program.

Section B collects information on employees and employee compensation during the previous season. Questions are asked to identify the number of people hired as vessel operators and sport fishing guides (B1), deckhands or other crew (B2), and staff of on-shore business operations (B3). Since the fishing season has several distinct time periods, these questions ask respondents to break down employment numbers by time period. Question B4 asks respondents to indicate the total compensation provided to each of the employee classes asked about in B1 to B3, and B5 collects information on the structure of payments for each type of employee.

Section C asks respondents for information on the business' offerings – types of fishing trips offered, plus other services such as lodging, non-fishing trips, etc. Respondents are asked to identify the types of trips they offer in C1, and then are asked to identify the specific fishing trip offerings in C2 and C3. C4 collects information on additional services provided on fishing trips, such as food and beverage, fish cleaning services, etc. C5 identifies whether the business charters whole boats, and if they do, what they charge for the service. Some charter businesses in Alaska offer lodging services. Question C6 asks about offering those services to non-fishing clients. C7 collects information necessary to calculate the annual revenues from the business' activities.

Cost information is collected in Section D. The section begins with two questions to identify the number of halibut client endorsements that were leased by the respondent's business during the season (D1) and the community or city in which most of their business transactions occur (D2). Questions D3 and D4 collect the fixed costs and variable costs, respectively, associated with operating the business for the previous year. Together with information from Sections B and C, economic models of the firm can be estimated to assess cost efficiencies, profitability in the industry, and economic impacts.

The next section asks respondents for information about their clients. Questions E1 through E3 ask for the percentage of clients that were returning customers (E1), booked trips a month or more in advance (E2), and booked at the last minute (E3). E4 asks respondents to identify the percentage of clients that booked fishing trips through different sources.

The final section contains questions aimed at further classifying respondents and their businesses, and in understanding respondents' investment in the businesses. F1 and F2 are used

to identify the type of business structure utilized by the charter business. F3 asks respondents for the percent of the business they (and their families) own, F5 asks for the percent of their household income earned from the business, and F4 collects information on the number of people from the respondent's household involved in the business and their role(s) therein. To assess off-season activities undertaken by owners of charter businesses, question F6 asks the respondent to identify what they did in the off-season.

The survey concludes with an open-ended question intended to capture general feelings about the survey, and offers a place for respondents to provide comments about management or policy issues, or about anything else.

### **Telephone Follow-Up**

Following the initial mailing and postcard reminder, we will contact non-respondents by telephone to encourage them to complete the mail or web-based survey and to collect limited information from those who decide not to participate in the survey.<sup>3</sup> The information provided by these non-respondents will be compared with that from respondents to address issues concerning non-response bias. Selected questions from the survey regarding their business structure, along with a few key, relatively accessible, economic-related questions, are asked to statistically test whether non-respondents differ from respondents with respect to these characteristics. The business structure questions include a single question (Q1) that captures what is asked in questions F1 and F2 of the survey, a question (Q5) asking for the percentage of the respondent's household income was earned from the charter business, and a question (Q6) about what the respondent did during the off-season. These questions match questions in the survey. In addition, the telephone follow-up interview includes questions to better understand why the respondent may not have returned the survey, including a question asking whether the respondent has plans to operate the business in the upcoming season (Q3), and if so, whether and what changes will be made to their business model (Q3a) (There is a Q2, which is a lead-in question, about whether the business will operate in 2012). Additionally, respondents are asked whether the charter business operates in saltwater or only in freshwater (Q4). Together information from these questions can be used to evaluate and adjust the results for potential non-response bias in the data.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained above, 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 Question10 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](#).

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<sup>3</sup> In the telephone follow-up, a limited amount of information may also be collected from those agreeing to return the mail 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.**

Survey respondents will be given the option of completing the survey on line at a Web site designed specifically to securely host the survey. Each respondent will have a unique login name and password to access the secure website and complete the survey. The login information will be provided in the survey mailing letters.

**4. Describe efforts to identify duplication.**

The information collected in this survey is not collected by other Federal, state, or local agencies. We have informed the Council, the Alaska Department of Fish and Game, and the Pacific States Marine Fisheries Commission (PSMFC) about this project. None of these entities have conducted or are conducting similar economic data collections. Although there is no economic content, the Alaska Department of Fish and Game administers a mandatory charter boat fishing logbook program that collects information on the clients and client harvests of halibut and other saltwater species aboard charter vessels in Alaska. Additionally, a joint NMFS and PSMFC pilot survey of charter boat operators in Alaska conducted in 2001 collected *trip-level* information (as opposed to seasonal or annual information collected in this data collection), including information on the services that were offered and amount clients paid for those services.

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

Considerable efforts have been made to minimize the burden of filling out the survey on charter boat businesses. Four focus groups (with a maximum of nine participants in each) and seven cognitive interview sessions<sup>4</sup> were conducted with charter boat business operators to obtain their input on potential questions and ways of improving the questions to make them easier (and faster) for them to answer. Moreover, we have made considerable efforts to stay in contact with the charter boat associations in the state to keep them informed of the status of the survey and the questions that we intend to ask.

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

If the data collection is not conducted, the Council and NMFS will not have information on charter boat operations and the effects of recent and proposed changes in fishing regulations on them and the regional economy of which they are a part. As a result, it will not be possible to monitor the impact of existing or proposed regulatory programs on the supply and behavior of saltwater-based charter boat fishing in Alaska.

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<sup>4</sup> Both the focus groups and cognitive interviews were conducted without a set list of questions.

**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 October 7, 2011 (76 FR 62374) solicited comments on the information collection. Several comments were received by e-mail. Twenty-three comments were received from charter boat operators in Alaska that expressed support for this survey. An additional comment was received from a charter boat operator that felt the survey was “too late to be meaningful” since the Council, NMFS, and IPHC have already put restrictive rules in place in 2011 regarding halibut harvest on charter boats, and generally expressing grave concerns for the health of his business and the industry as a whole. A response was provided to the individual acknowledging his concerns and assuring him that a primary goal of this work is to begin to collect the information necessary for decision makers to better understand the impacts on industry from current and potential future management actions.

Several individuals outside NMFS 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 Alaska Department of Fish and Game, the Council, and the International Pacific Halibut Commission with experience in recreational fishing issues in Alaska.

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

No payments or gifts will be provided to respondents.

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

In the cover letter accompanying each mailing, respondents will be told that their responses are voluntary and will be kept strictly confidential. The initial mailing letter and the follow-up mailing cover letter also include the following statement:

“All information you provide in the survey is considered confidential under section 402(b) of the Magnuson-Stevens Act (16 U.S.C. 1801, *et seq.*) and [NOAA Administrative Order 216-100](#). Only aggregated results from the survey will be released publicly. Your personal information will not be disclosed and will only be accessible to authorized personnel responsible for

management and research of fisheries under the authority of NOAA. All authorized personnel have signed nondisclosure agreements specifying penalties for unauthorized use and disclosure of confidential fisheries data.”

Following completion of the data collection, the cooperating agency implementing the survey (PSMFC) will delete any information identifying individuals (i.e., name, licenses, and addresses) before any data file is delivered to NMFS or any other participating researchers and agencies. The plan for collecting data and maintaining its confidentiality will adhere to NOAA Administrative Order 216-100 and Section 402(b) of the Magnuson-Stevens Fishery Conservation and Management Act of 1996, as per the notice above.

**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 an estimate in hours of the burden of the collection of information.**

Each year, the survey will be sent to all licensed charter businesses in Alaska. For 2011, this amounts to 643 charter businesses. The contact information for each business will be obtained from ADF&G’s license database that contains updated address and telephone information for each licensee. We expect a final response rate of approximately 50 percent, leading to 321 responding license holders returning completed surveys. Charter operator representatives we have spoken with have indicated that if they have completed their federal tax returns prior to filling out the survey, the survey should take no more than 90 minutes (which is why we have planned to implement the survey in April), the response time we assume for computing the potential burden hours. As a result, those ultimately completing the survey are expected to contribute up to 482 hours to the overall annual hour burden.

Based on our experience with other surveys, we expect 277 respondents to have returned a completed survey or completed the on-line survey following the initial mailing and postcard reminder (~86% of all completed surveys). Given that updated telephone numbers are available from the sampling frame (ADF&G license database) for all respondents, we expect to be able to contact 100% of those who have not yet responded to the mail or web survey (643 - 277 = 366 respondents). These 366 license holders will be contacted by telephone and encouraged to complete and return the survey and 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. The phone interview is expected to take 6 minutes on average to complete, and assuming 100% of the 366 individuals for which there is a phone number are reached and complete phone interviews, the contribution of the phone interview to the total time burden totals 37 hours. Following the phone interviews, the second full mailing will be sent out to all individuals who have not returned a completed survey to date. As noted above, we expect an additional 44 individuals (321 – 277 = 44) to have completed surveys following the phone

interviews and second full mailing. Thus, totaling the time contribution of the 321 completed mail surveys (482 hours) with the time from the phone interviews (37 hours) yields a total of 519 hours per year (Table 1).

The total number of unique respondents to all contacts in the survey implementation will be 321 (mail survey respondents) + 366 (phone respondents) – 44 (phone respondents who also returned the mail survey) = 643 (the total population size). Over a 3-year period, the survey will be administered three times. Assuming a static population size, which is reasonable given the limited entry system, we anticipate the annual estimates of respondents and time burden will be identical across years. Thus, the total burden hours is expected to be 1,557 hours (3 years × 519 hours).

*Table 1. Annual Burden Hours by Survey Instrument*

<b>Survey instrument</b>	<b>Estimated number of respondents per year</b>	<b>Estimated time per respondent (minutes) per year</b>	<b>Estimated total annual burden hours (hours) per year</b>
Mail survey (from initial mailing, postcard reminder)	277	90	416
Follow-up phone survey	366 <sup>a</sup>	6	37
Mail survey (second full mailing)	44	90	66
Annual totals	<b>643<sup>b</sup></b> (687 with duplication)		<b>519</b>

<sup>a</sup> Number of successful phone contacts of license holders that have not returned completed surveys following initial mailing and postcard reminder.

<sup>b</sup> Total unique respondents reflect the total licensees who complete the initial survey and all who completed the phone interview, including those who completed the survey afterward (accounts for individuals who completed both).

**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).**

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

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

Annual cost to the Federal government of survey implementation is approximately \$50,000 divided as follows: \$40,000 in contract award money and \$10,000 in staff time and resources. Services provided by a cooperating agency, specifically PSMFC, include conducting the survey implementation, entering and cleaning the data, and preparing a report that documents the survey procedures and response rates.



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

This is a new collection.

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

The response rates, survey data, and analysis of the data will be described in a report. A separate paper describing economic models used to analyze the data and the results from estimating these models will be submitted to a peer-reviewed journal. Statistical data summaries in tabular form will be made available at the Alaska Fisheries Science Center Web site.

**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.**

Not Applicable.

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

Not Applicable.