

**SUPPORTING STATEMENT
MARINE RECREATIONAL INFORMATION PROGRAM, HAWAII MAIL-IN
SURVEY FOR SHORE FISHING EFFORT
OMB CONTROL NO. 0648-XXXX**

A. JUSTIFICATION

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

This request is for a new information collection.

Marine recreational anglers are surveyed by Marine Recreational Information Program (MRIP) to collect catch and effort data, fish biology data, and angler socioeconomic characteristics. These data are required to carry out provisions of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1801 et seq.), as amended, regarding conservation and management of fishery resources. Marine recreational fishing catch and effort data are collected through a combination of mail surveys, telephone surveys and on-site intercept surveys with recreational anglers. Amendments to the Magnuson-Stevens Fishery Conservation and Management Act (MSA) require the development of an improved data collection program for recreational fisheries. To meet these requirements, the National Oceanic and Atmospheric Administration (NOAA) Fisheries has designed and tested new approaches for sampling and surveying recreational anglers.

This is a pilot study for the purpose of testing an alternative survey method to replace the coastal household telephone survey (CHTS) used by Marine Recreational Fisheries Statistics Survey (MRFSS). In response to the recommendations by the National Research Council panel (NRC, 2006) to improve the fishing effort survey, the National Saltwater Angler Registry (NSAR) was created to provide a more efficient sampling frame. Most states/territories have applied for exemptions based upon pre-existing state angler registries, newly-created license programs, or other alternative databases. However, the State of Hawaii does not require saltwater fishing licensing/registration for most recreational fishermen (though there is a Federal permit requirement for non-commercial bottom fishing). Consequently, Hawaii is now the only state (along with Puerto Rico and the U.S. Virgin Islands) where recreational fishermen are required to register with NSAR. There are no anadromous fish in Hawaii, and shoreline anglers and boat fishermen fishing only within 3 miles from the shore are not required to register with NSAR. Therefore, Hawaii's NSAR database is an incomplete sampling frame for boat fishing effort surveys and the registry does not contain anglers who are involved in shoreline fishing only.

Pilot surveys in Hawaii consisting of an onsite roving survey (for effort and catch rate) and an offsite mail-in effort survey have been funded by MRIP. A mail survey of all anglers within a household will be used to collect recent fishing effort data including gears and methods of fishing from shore. The main purpose will be to compare to onsite roving counts of shore fishing effort during the same period and to produce adjustment factors for under-coverage of the roving on-site survey (the roving effort survey does not require response from the public). The survey scope is Oahu, during a single 2-month sampling wave (current schedule September–October, 2014). The effort estimate combined with catch rate data from the concomitant roving catch survey will produce estimates of total catch, harvested catch, and live released catch.

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 proposed mail survey will collect data on fishing gear and fishing hours used for shoreline fishing and the proportions of gear hours* from night fishing and from private/restricted areas. A concomitant onsite roving survey will provide estimates for catch rate and fishing effort (gear hours) from day time and accessible sites. Total catch and effort from shoreline fishing can be estimated based on the result from the two surveys. The fishers will be asked to classify themselves in one of four categories: 1) Fish primarily for pleasure (eg. catch & release) and never sell any catch; 2) Fish primarily for food and never sell any catch; 3) Sell some catch to help cover fishing expenses or 4) Sell catch for profit to pay living expenses. Data from commercial fishermen, who sell catch for profit to pay living expenses, will be excluded for non-commercial catch and effort estimation expansion. Data from expense fishermen, who sell some catch to help cover fishing expenses, will be included for expansion as in current Hawaii Marine Recreational Fishing Survey. Expense fishermen are different from the commercial fishermen who sell fish to realize economic profit. However, expense fishermen may be considered commercial by some people because they sell fish. A separate category for expense fishermen helps clarify the ambiguities between commercial and non-commercial fishermen. If fishing activities are different among the other three fisher categories, the category information can be used to improve catch and effort estimation. The Federal and state fisheries managers will use the information to improve/develop the shore-based recreational fishing survey in Hawaii so that survey data can be better used for fishery management. The mail-in survey is a one-time survey which will be implemented with an initial mailing and two follow-up mailings. A report will be generated from this project and the report will be available to fisheries managers and the public as well.

The National Marine Fisheries Service (NMFS) will retain control over the information and will safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be 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 techniques or other forms of information technology.

The survey will be conducted via mail. The survey questionnaire will be printed on paper form and will be mailed out to individual households. The completed questionnaires will be returned by mail, and the data will then be entered into an Excel (or Access) database.

4. Describe efforts to identify duplication.

The current coastal household telephone survey (CHTS) collects effort information for fishing

from shoreline and private boats. The effort information from CHTS is for angler trips. The proposed survey will gather effort information in gear hours. In addition, specific information regarding fishing at night and fishing from private/restricted area, which is not available in CHTS, will be acquired in the proposed survey.

Approximately 1% of households on Oahu will be contacted by this mail survey. The current CHTS contacts fewer than 0.2% Oahu households every two months. It is expected that fewer

*Gear hours is the product of number of fishing gears and number of hours fished with that gear each time. For instance, if two rod&reels were used during a shoreline fishing trip and the fisherman fished for 5 hours. The fishing effort would be $2 \times 5 = 10$ rod&reel hours. Current CHTS would count this as 1 angler trip. We want to have the fishing effort from the mail survey to be measured by gear hours so that we can compare with the effort estimated from the onsite roving survey. The onsite roving survey can estimate the number of fishing gears used for fishing at any moment (C) during the fishing hours (T hours) in a day. The fishing effort would be $C \times T$ (gear hours) that day based on the roving survey.

than 10 households will be contacted by both this mail survey and CHTS when the mail-in survey is conducted. If the mail survey will be adopted and implemented in the future, CHTS will be replaced and there will be no duplication.

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

Only individual households will be contacted by the survey. If the survey questionnaires are sent to a few addresses for small businesses or other small entities, the questionnaires can be completed if the property is also used as residence. We expect that such cases will be rare. The survey is voluntary and short. It should take no more than 20 minutes for an average fishing household to complete and it will take less than 5 minutes for a non-fishing household to complete.

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

As stated in the response to Question 1, this study is going to test alternative methods to replace the Coastal Household Telephone Survey (CHTS). CHTS has been viewed as inefficient due to the increased use of cellular telephones (NRC, 2006) and will be phased out soon. Without a testing and implementation of a more efficient method, the effort survey would remain problematic and the fishery management need might not be met.

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

Not Applicable.

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 April 21, 2014 (79 FR 22099) solicited public comment. No specific comments pertaining to this mail survey were received.

The survey was developed by a working group of scientists, researchers, and managers from academia, NMFS, the Hawaii Division of Aquatic Resources, and the Western Pacific Regional Fishery Management Council. Some outreach for this survey has been done at public meetings with Hawaii recreational/non-commercial fishermen, hosted by NMFS.

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

Not Applicable.

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

The survey instrument will include a text box (with the Paperwork Reduction Act statement) to assure the respondents that all data will be confidential and that only aggregated responses will be released to the public, as required by section 402(b) of the Magnuson-Stevens and [NOAA Administrative Order 216-100](#), Confidentiality of Fisheries Statistics. Section 402(b) stipulates that data required to be submitted under an FMP shall be confidential and shall not be released except to Federal employees and Council staff responsible for FMP monitoring and development or when required under court order. Individual responses from the survey will be confidential and the final dataset will only contain household codes without actual names or addresses. The fishers will also be informed that the survey is conducted in accordance with the Privacy Act of 1974 and they are not required to answer any questions that they consider to be an invasion of their privacy.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are asked.

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

We estimate that 1200 households will respond to the survey. For an average fishing household, 20 minutes is needed to complete the questionnaire. For non-fishing households, it should only take few minutes to complete. The total burden hours is expected to be 400 hours.

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 cost to respondents other than the cost of their time to complete the survey questionnaire.

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

The cost of this survey is approximately \$30,000 including materials (stamps, envelopes, letterheads, and postcards), printing, and labor for handling mailings. An additional \$10,000 is expected for the service of professional staff (statistical consultants) for the survey design and data analysis. The total cost to the government is about \$40,000.

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

This is a new program. Currently there is no existing routine mail survey for fishing effort in Hawaii. The proposed mail survey will be a one-time pilot test.

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

Data will be tabulated in summary statistical forms and percentages across some categories will be calculated. The ratios of fishing effort from night fishing and from remote/restricted area will be used to adjust the results from a concomitant onsite roving survey. The results will be published as a project report and posted at a NMFS website (<https://www.st.nmfs.noaa.gov/mdms/public/public.jsp>).

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.