

**SUPPORTING STATEMENT
EXPENDITURE SURVEY OF HIGHLY MIGRATORY SPECIES
TOURNAMENTS AND PARTICIPANTS
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.

The National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) manages recreational fisheries, under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The MSA requires that fishery management plans be prepared using the best scientific information available and that each plan include a fishery impact statement assess, specify and analyze the likely effects, including the social, conservation and economic impacts of conservation and management measures for participants in the fishery and fishing communities.

Marine recreational fishing is a popular pastime across the United States that generates significant economic impacts to both local economies and the nation. One category of economic activity that is most directly supported by marine recreational fishing is fishing tournaments. Fishing tournament operations can be heavily impacted by spatial and temporal changes in recreational fishing participation caused by major storm events, contaminant spills, and fishing regulations such as fishery closures. NMFS is required to enumerate the economic impacts of the policies it implements on fishing participants and coastal communities. In order to fulfill this mandate and in recognition of the economic importance of businesses supported by recreational fisheries, NMFS will conduct regional cost and earnings surveys on highly migratory species (HMS) tournaments.

Tournaments are a uniquely large part of recreational fisheries for HMS. An annual average of 259 fishing tournaments targeting HMS have been registered on the Atlantic and Gulf of Mexico coasts over the last ten years. Tournaments are significant social events for HMS anglers, and provide a unique opportunity for anglers to interact with each other, making them significant events for the distribution of ideas and opinions. Additionally, tournament organizers and participants can incur significant expenditures associated with organization and participation in HMS tournaments which can have important economic impacts on local economies. HMS tournaments can offer significant payouts of cash prizes for the eventual winners. For example, the 2012 White Marlin Open issued a cash prize of approximately \$1.2 million for the largest white marlin caught, and a total payout of \$2.5 million for all prize winners. An updated and more comprehensive quantification of expenditures associated with HMS tournaments would be greatly helpful in assessing the potential economic effects of proposed regulations that could affect the frequency of and participation in HMS tournaments, and was identified as an objective under Goal 3 of the Atlantic HMS Saltwater Recreational Fishing Action Agenda (September 2013). The proposed data collection will be the first time NMFS will conduct a regional survey

to gather cost and earnings data on highly migratory species marine recreational fishing tournament operators and participants.

2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 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 information will provide fisheries managers with baseline quantitative information on the costs and earning of highly migratory species fishing tournaments. Fisheries managers, council staff, and the Atlantic HMS Advisory Panel members may refer to the information periodically to better understand the economic characteristics of HMS tournaments in their region.

The study will use two survey instruments to collect information from tournament operators and participants. One survey will ask tournament operators to characterize and quantify their operating costs and income sources in addition to describing their tournament participants. The first section of the tournament operator survey collects information regarding general tournament operations, such as tournament location, dates, number of participants, and species for which prizes were awarded. The purpose of this information will be to categorize the different types and sizes of HMS tournaments. Section B asks for funding sources, such as registration fees, sponsorships, concessions, and the sale of merchandise. This data will be used for calculating tournament revenues and estimating the regional economic impacts of operating these HMS fishing tournaments. Section C asks for tournament expenses, such as labor, tournament prizes, site fees, local licensing, equipment, and entertainment. This data will be used for estimating the regional economic impacts of operating these HMS fishing tournaments.

The other survey instrument will ask fishing tournament participants to estimate their expenditures associated with travel to, entering, and participating in the tournament. Section A of the participant survey asks for general information regarding where the angler participated in the fishing tournament, how long they participated, and whether travel was involved for this event. Section B lists the most common types of expenses associated with tournament trips and asks participants to provide the amount their team spent and the primary state the money was spent. This data will be used for estimating the regional economic impacts associated with the expenditures made by the participants of HMS fishing tournaments. Section C is similar to Section B but focuses on tackle and durable equipment expenses such as fishing rods, reels, and other tackle that might be acquired for tournament participation. Section D gathers some basic demographic information, such as age, sex, and fishing avidity, that will be used for characterizing participants and testing for non-response bias.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information as with the results of previous economic surveys of the recreational fishing community (i.e., angler expenditure surveys and for-hire cost and earnings studies). NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with NOAA standards for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to

yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

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.

This information collection survey will involve the use of electronic reporting and automation. The primary data collection vehicle will be an internet-based survey forms delivered at tournament events. The web-based forms will be designed to be mobile device friendly, so respondents can either use a personal computer, mobile phone or tablet to complete the survey. Respondents will have the option to request a paper-based survey that can be returned via a self-addressed postage-paid envelope. Some use of mail merge automation will be involved in mailings associated with this survey. The survey contractor may also utilize automation when conducting follow up calls for survey reminders.

4. Describe efforts to identify duplication.

Based on discussions with other NOAA economists, there is no duplication of effort within NOAA. This is the only regional HMS tournament expenditure survey conducted that gathers information on costs and earnings for both tournament operators and tournament participants. This survey collects similar information to the NMFS Angler Expenditures survey but does so only for participants of HMS tournaments. Coordination between the HMS tournament participant survey and the Angling Expenditure survey will occur to avoid oversampling individual anglers.

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

Tournament participants are primarily individuals or households and are not considered small business entities. Many tournament operators, however, are small businesses or nonprofit small entities. Several steps have been taken in this survey to minimize burden. First, we have kept the survey to 5 pages of questions to ensure it can be completed in the shortest amount of time possible. Second, we are allowing respondents to either use a web-based form or a paper-based form to respond. Third, we will provide a phone number for respondents to call for more information and assistance with responding to the survey. Finally, this reporting is completely voluntary, and all selected tournament operators will be made aware of this fact in every cover letter accompanying the questionnaire.

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

As stated above, NMFS is required to collect economic data that can be used to describe the economic effects on local communities and participants from changes in fisheries management policies. It is vital to collect cost and earnings data via a survey of HMS fishing tournaments because there are no other sources of this information that provide the level of detail required.

Without this type of information, fisheries managers will not be able to assess the economic effects that result from changes in recreational fisheries policies that can affect HMS tournament operations and participation, and therefore, the effects on local and regional communities. Without this study, no other contemporary detailed economic description and characterization of regional HMS tournament operations and participants will be available.

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

The collection will be conducted in a manner 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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on August 25, 2015 (80 FR 51538) and solicited public comment. The Billfish Foundation provided a comment in response to that Federal Register Notice stating that HMS tournament participants may not complete the survey regarding fishing expenditures, in part, due to their mistrust of government entities. The Billfish Foundation is concerned that a low response rate could produce an inadequate picture of this recreational fishery and its economic worth. They also noted that tournament directors will likely complete the HMS tournament operators survey to varying degrees. NMFS acknowledges these concerns and hopes to work with The Billfish Foundation and other groups to improve outreach to fishing tournament participants on the value and importance of this survey. While there could be some challenges regarding response rates, NMFS experience with the HMS Angler Expenditure Survey in 2011, which had a 57% response rate, seems to indicate that HMS fishermen are willing to report their fishing expenditures to NMFS during a survey.

Members of the NMFS Atlantic HMS Management Division also attended six tournaments during the summer and fall of 2015. At these tournaments, staff gave short presentations on the planned HMS tournament survey during the tournaments captain's meetings and Agency staff was available to answer questions and receive feedback during the tournaments. The feedback and observations made during these tournament site visits led to changes in the survey forms to address charitable contributions made by tournaments, the team nature of participant expenses, and how some teams receive sponsorships to participate in tournaments.

In addition to the Federal Register Notice and site visits, the Agency conducted a breakout session at the September 9, 2015, Atlantic HMS Advisory Panel meeting specifically to discuss the expenditure survey of Atlantic HMS tournaments and participants. Members of the Advisory Panel provided general support for the study. They encouraged us to provide respondents with information as to why this study is important for tournament operators and participants. In

addition, we received feedback on the appropriate cost categories to include in the survey. In addition to the feedback received at that meeting, NMFS received three written comments from Advisory Panel members following the meeting. Those comments are summarized below:

Comment #1: This commenter noted that many tournaments are not boat-based tournaments and are configured as angler tournaments. Those tournaments may also include bay, near-shore, and offshore categories. The commenter also notes that it might be more relevant to specifically ask the tournament operator the number of offshore boats fishing for HMS in the tournament. On a similar note, they also suggest that instead of just asking for the number of participants in the tournament, NMFS should decide if the question should instead ask for the number of anglers targeting HMS in the tournament. In regards to asking about the number of spectators at the tournament, the commenter notes that some tournaments are web-based, and therefore instead of just asking about the number of spectators at weigh-ins, NMFS should also consider asking about the number of webcast viewers. The commenter also suggests removing the question regarding funding from Optional Entry Fee/Calcutta since this can be a touchy subject to some tournaments, and could therefore impact response rates. They also suggest making the monetary awards category optional for the same reason. The commenter notes that some tournaments make contributions to specific items other than charitable donations, such as educational scholarships, so NMFS should consider adding an “other” contributions category for this question.

Response: NMFS recognizes that many tournaments are not solely boat-based. The survey addresses this issue by asking both how many boats fished and the estimated total number of participants in the tournament. NMFS has modified the survey to clearly ask for the number of boats fishing offshore for HMS in the tournament and the survey now asks for the estimated total number of participants in the tournament.

In regards to the number of spectators, the survey is focused on regional economic impacts so the survey is focused on only the number of local spectators at the weigh-ins. Web-based viewers are outside the current scope of this study.

NMFS acknowledges that the term Calcutta can be a sensitive topic for some tournament operators, but other tournaments visited by NMFS staff are still using that term. To reduce the potential for this question to reduce response rates, it now states that this is an optional field and also uses the terms “Optional entry fees” and “Tournament within a Tournament” in addition to Calcutta.

NMFS has added a question to address contributions to other causes, such as educational scholarships.

Comment #2: The commenter notes that it should be clear on the form regarding whether or not this survey is voluntary. Many tournaments do not routinely collect information on the total number of participants in the tournament (including anglers, crew, and captains) and the commenter asks if NMFS is interested in an estimate of participants. The commenter highly recommends not using the term Calcutta, since this is perceived as illegal gambling (game of chance) by the Internal Revenue Service (IRS). In some events, it is called a Tournament within

a Tournament (TWT) and the IRS is fine with that description. In the tournament expenses page, the commenter recommends that NMFS should be clear in its wording that this information is confidential and will not be provided on an individual tournament basis to anyone. Regarding the HMS tournament participant form, the commenter made suggestions to remove references to “on this day” and instead reference this tournament, since many tournaments run for several days. When asking about whether participants took time off work without pay, the commenter suggests that the question should ask whether all fishing party members took time off work to participate in the tournament. Instead of asking about expenses individually on ice, bait, and fuel, the commenter notes that, in most events, participants just pay a total bill to the marina for these at the end of the event. At many events, not all boats stay at the marina but rather are scattered up and down the coast. The commenter asks how NMFS plans to normalize the responses since staying at a private dock or at a home port may be vastly less expensive in terms of travel.

Response: The survey forms now clearly indicate that this is a voluntary survey.

NMFS does want an estimate of the number of participants in the tournament, so the word “estimate” has been added to this question.

NMFS acknowledges that the term Calcutta can be a sensitive topic for some tournament operators, but other tournaments visited by NMFS staff are still using that term. To reduce the potential for this question to reduce response rates, it now states that this is an optional field and also uses the terms “Optional entry fees” and “Tournament within a Tournament” in addition to Calcutta.

The survey form now notes that the information provided is confidential and will not be provided on an individual tournament basis to anyone.

NMFS removed references to “on this day” and instead references this tournament in the survey questions.

NMFS changed the question regarding time taken off work without pay to address the entire fishing party.

While it may be common for some to pay ice, bait, and fuel at the marina, many tournament participants leave from private docks and may acquire these items separately. NMFS believes most participants will be able to estimate the portion of their marina bill dedicated to each of these items.

NMFS acknowledges that many boats that participate in a tournament may depart from different locations. NMFS would like to obtain a representative sample of tournament participants so we can estimate average expenses over both marina and home port vessels.

Comment #3: This commenter recommended that distribution of a hard copy paper survey form would be most advantageous at each tournament’s captain’s meeting. If possible, the person distributing the survey, hopefully tournament director, will take a few minutes during the meeting to explain the importance and use of the survey. The commenter recommends a tangible

incentive be given to teams that complete the survey. If this option cannot be put forth by the government, then coordinating with tournament directors to require completion of the form might generate some completed form. The commenter suggests that the survey should also ask whether the respondent is the boat owner, captain, or both. The respondent should also be asked whether they are a full-time paid private boat captain or a for-hire boat owner/captain. A category that allows for reporting of dockage fees for boats that travel to the tournament location from their home port should be helpful in better understanding the full scope of expenditures, especially in a multiple day tournament. Another consideration might be to include an additional column that reflects any expenses incurred during the tournament for unscheduled boat care, maintenance, repairs, etc. In addition to asking the number of tournaments fished, the commenter recommends asking what other species they target in other tournaments.

Response: NMFS plans to distribute fliers to tournament participants regarding the study with instructions of how to complete the survey online and also plans to produce hardcopy versions of the survey that can be provided on request.

NMFS will be contacting tournament operators to facilitate in person distribution of the survey information to participants at captain's meetings.

While a tangible reward would potentially increase response rates, it is not possible for NMFS to provide or facilitate such a reward.

A category that allows for reporting of dockage fees for boats will be added to the survey and an additional column that reflects any expenses incurred during the tournament for unscheduled boat care, maintenance, repairs, etc. may also be added after some additional field testing of the survey instrument.

While it would be interesting to find out what other species a tournament participant targets in other tournaments, NMFS considers this additional information will add to complexity of the survey and will not provide any significant additional information in regards to the objectives of this HMS tournament study.

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

No payments or gifts are made.

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

As stated on the survey instruments, the information collected by this survey will be protected in part by the Trade Secrets Act. Any confidential business information protected by the Trade Secrets Act will only be released for public use in aggregate statistical form unless disclosure of raw data is required under applicable law. If the individual survey data are requested, NMFS will

apply exemptions under the Freedom of Information Act to protect confidential business information.

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.

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

NMFS will collect cost and earnings data from all HMS tournaments registered within the year. There are approximately 260 Atlantic HMS tournaments annually, based on recent years' tournament registration data, and an additional 40 tournaments may be sampled in the Pacific region. In addition, NMFS will select 50% of registered tournaments to distribute expenditure surveys to anglers registered for those tournament events. We anticipate a 75% response rate from tournament operators and a 40% response rate from tournament participants based on past surveys.

Tournament operators:	300 tournaments
Total responses:	225 completed surveys (75% response rate)
Completion time:	30 minutes per survey
Total hours:	113 hours

Tournament participants:	50 participants estimated per tournament (50 x 150)
Total responses:	3,000 completed survey (40% response rate)
Completion time:	15 minutes per survey
Total hours:	750 hours

Total responses:	3,225 responses
Total annual hours:	863 hours

Using an hourly rate of \$22.71 for tournament participants based on the average wage for all civilian workers from the May 2014 National Employment and Wage Estimates (http://www.bls.gov/oes/current/oes_nat.htm) 750 burden hours are estimate to result in approximately \$17,033 in opportunity costs. Using an hourly rate of \$46.75 for tournament operators based on the average wage for management occupations from the May 2014 National Employment and Wage Estimates (http://www.bls.gov/oes/current/oes_nat.htm) 105 burden hours are estimate to result in approximately \$5,283 in wage costs. A total of 863 burden hours are anticipated across all parts of the survey, resulting in a cost to respondents of approximately \$22,316. There are no other costs to respondents.

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

There are no start-up, capital, or maintenance costs associated with this collection. No new or specialized equipment is needed to respond to this collection. A basic computer or mobile device connected to internet may be used to respond. The survey will be provided online at a mobile-friendly designed website and respondents will also have the option of requesting paper forms with postage-paid envelopes included.

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

Based on the cost of conducting the 2014 survey, the estimated cost to the Government is a one-time cost of approximately \$160,000 for conducting the online and mail surveys, telephone follow up calls, developing and cleaning the sample frame, developing the web based survey, printing and mailing, and entering the data from the survey into a database. All analysis of the data and reporting, and any scientific publications will be developed by NMFS staff as part of their regular federal duties. The labor cost of this staff time is estimated to be approximately \$100,000.

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

This is a new submission.

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

All results will be entered in a database using standard QA/QC procedures in survey research. Economists from NMFS will analyze the data using standard software (i.e., SAS) and standard statistical procedures that are appropriate for survey data. Results from this collection may be used in scientific, management, technical or general informational publications, and would follow prescribed statistical tabulations and summary table formats.

A technical memorandum detailing the results will be developed and be included on the web page of the Atlantic HMS Management Division of the Office of Sustainable Fisheries, NMFS. The Web site address is

<http://www.nmfs.noaa.gov/sfa/hms/compliance/tournaments/index.html>. The report will also be referenced at the NMFS Office of Science and Technology recreational fisheries economics web page at <http://www.st.nmfs.noaa.gov/economics/fisheries/recreational/index>. Data from this survey may support research and analyses to be presented at appropriate professional meetings and may be submitted for publication in appropriate economic or fisheries peer-reviewed journals. A full report of the survey results will also be produced and a preliminary summary will be provided in the annual Atlantic HMS Stock Assessment and Fisheries Evaluation Report.

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.