

## SUPPORTING STATEMENT

### SOCIOECONOMICS OF GUIDED WILDLIFE VIEWING OPERATIONS IN THE STELLWAGEN BANK NATIONAL MARINE SANCTUARY

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 to benefit natural resource managers in Stellwagen Bank National Marine Sanctuary (SBNMS). The National Ocean Service (NOS) proposes to collect information from wildlife watching operations to ascertain the market value of marine wildlife via the ocean recreational industry in the Stellwagen Bank/Gulf of Maine region.

Up-to-date socioeconomic data is needed to support the conservation and management goals of SBNMS to strengthen and improve conservation of marine wildlife, including whales, pinnipeds, seals, and seabirds within the jurisdiction of the sanctuary and to satisfy legal mandates under the [National Marine Sanctuaries Act](#) (16 U.S.C. 1431 et seq), [Endangered Species Act](#) (16 U.S.C. 1531 et seq), [Marine Mammal Protection Act](#) (16 U.S.C. 1361 et seq), [National Environmental Policy Act](#) (42 U.S.C. 4321), Executive Order 12866 (EO 12866), and other pertinent statutes.

SBNMS is currently in the process of updating the 2010 Management Plan, and has identified a lack of baseline socioeconomic information on ocean recreation businesses. The information is not available to assess the possible economic benefits of marine wildlife protection to the local economy, or the potential impact on ocean recreation businesses. The type of data targeted for this collection; that is, information person-days, trips has not been updated since 2008 and there are no source so information that detail operators' perceptions and attitudes towards the industry and sanctuary. Thus, current information on the importance of marine wildlife to the local tourism industry and operators is required. **The primary focus for the survey will be to gather data on the non-consumptive, person-days of marine wildlife viewing and operators' perceptions and attitudes.** Specifically, researchers will collect data to help determine the contribution of marine wildlife watching operations to the economy in the Stellwagen Bank region. The number of person-days of wildlife viewing is necessary to estimate the economic value that the industry makes to the region.

Spatial data of the operations wildlife viewings will also be collected to help management identify hot-spots of wildlife viewing activity to improve management and conservation of marine mammals include the endangered North Atlantic Right Whale. Ocean recreation businesses include whale watching, seabird charters, kayaking, SCUBA diving, and paddle-boarding.

Collection of this data will help provide estimates of the potential economic benefits of the diversity of marine wildlife in this region and the spatial use of operations (in conjunction with a passenger survey – to be submitted at a later date).

**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.**

### **General Overview**

The purpose of this information collection is to obtain the information necessary to calculate estimates and build tools that can be used by natural resource managers at the SBNMS to evaluate the value of whales, pinnipeds, sea otters, and seabirds within the sanctuary, as well as estimating potential impacts of alternative management options on the local tourism industry. Socioeconomic data will be gathered from commercial whale and marine wildlife observation operations and will be used to develop social and demographic profiles of business owners/operators. Spatial data documenting, where commercial, non-consumptive marine wildlife viewing activities occur in the region, will be used to enhance management and monitor any conflicting potential uses. For future passenger surveys (a separate request) in which expenditures are estimated, the person-days from the operators provides the basis of extrapolating from sample to population. This survey of operators is the only way of identifying the population of whale watching and other non-consumptive recreation users that access the resources via for hire operations.

The unit of measurement is the operation. The interviewer does not select the appropriate person to interview. Instead, the business owner selects the appropriate person (i.e. most knowledgeable) for each type of information. This is a records based data collection for which we send out a team to the business establishment and obtain the majority of information from their records. The only information that is tied to a particular person in the operation is the demographics. Demographic information applies to the business owner. This is done so we can meet the requirements of the Regulatory Flexibility Act (impacts on small entities—primarily small businesses) in analyzing the socioeconomic impacts of regulations.

**Who will use this information?**

Data gathered during this collection will be used by SBNMS and, more generally, the Office of the National Marine Sanctuaries. The information gives this industry representation in the development of management plan priorities by SBNMS management and its sanctuary advisory council. The surveys will be conducted by volunteers and students at the Emerson College in Boston, MA. SBNMS will use this data to inform their upcoming management plan update.

Further, information on the spatial hot spots of wildlife viewing will help to inform management about potential conflicts among users that may arise in a given areas. This information, may also be used by sanctuary scientists to better understand where whale populations congregate in the summer season.

**How frequently will this information be used? This will be a one-time information collection.**

**For what purpose will the information be used?**

Data gathered during this collection will be used by SBNMS and, more generally, the Office of the National Marine Sanctuaries, to support a stakeholder outreach process conducted in and by Stellwagen Bank National Marine Sanctuary. Completing this information collection will give SBNMS wildlife viewing operation stakeholders' fair representation in the design of management strategies by providing information to support the assessment of socioeconomic impacts of management alternatives. The data may potentially be used for conduct of socioeconomic impact analyses under the National Environmental Policy Act (NEPA), Executive Order 12866 (Regulatory Impact Review) and an Initial and Final Regulatory Flexibility Analyses (impacts on small businesses). Finally, the information collected also has potential to be used by resource managers for outreach and education purposes.

**Summary of Survey Questions and Mapping Activity**

The questions that will be included in this collection are similar to those submitted under OMB Control Number 0648-0408, Expiration Date: 6/30/2003 for the Channel Islands National Marine Sanctuary and OMB Control Number 0648-0717 for CINMS, approved 7/1/2015. The questions have been slightly modified to meet the data requirement for the present management purpose. The survey items can be categorized into two primary components: general information and economic information. Attached is a discussion of the survey questions and the purpose of each question or set of questions.

**Compliance with Information Quality Guidelines**

NOAA National Ocean Service, Office of National Marine Sanctuaries 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](#). All analyses and reports developed in this project will be peer reviewed before release to the public. In addition, all data and documentation are made available so other researchers can replicate our results.

**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.**

No automated, electronic, mechanical, or other technological or other forms of information technology are being used. All surveys with whale and marine wildlife watching operators will be conducted face-to-face and will be recorded on paper forms.

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

The research team consulted with resource managers at the SBNMS to determine what types of socioeconomic data collection activities were planned or presently ongoing in the region related to whale and marine wildlife watching industries. To avoid survey fatigue and overburdening business owners with data collections, the team consulted with researchers who have projects underway or planned to determine if there was overlap of target populations. We identified no projects that included our target population of whale and marine wildlife watching operators for collections. The literature review did not reveal any more recent efforts completed or underway to collect similar information. Additionally, representatives of the ocean recreation industry were consulted to inquire about whether they were currently or recently involved in the same or similar type research. The response was that they were not. The National Marine Fisheries Service was also contacted to verify they were not planning a similar study, and they were not. Further, ONMS reached out to IFAW to confirm they were not planning to replicate their whale watching survey.

Researchers conducted a literature review to determine if and to what extent existing information might meet the needs of SBNMS.

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

All the business entities in this information collection request can be classified as small businesses. Our approach is not to send out questionnaires to be filled out by respondents. Rather, to increase efficiency and reduce the respondent's burden, we will send out an information collection team to the home or office of the business owner/operator. The

information collection team will work with the respondent to complete the information collection. When arranging information collection interviews, our approach is to discuss the types of information we will be asking for during the interview. This enables the respondent to prepare before the interview, gathering any important records or documents that might be needed by the team. For example, for the spatial use information, access to trip logbooks is generally required.

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

Without this collection, a critical data gap will remain that could inhibit the ability for resource managers to conduct a thorough social impact assessment that will inform the Management Plan Review process. The most important aspect of this data collection is that it provides the basis of identifying the amount of use in the sanctuary and is the key first step of a two-step process. The second step is a survey of the passengers. The survey of operators provides the basis of extrapolating the sample of passengers to population estimates by also providing the information to weight passenger data by operation. Without the ability to weight the passenger survey and extrapolate the passenger survey to population estimates, the passenger survey information cannot be used. Further, information that may help to manage areas with multiple uses that may conflict with one another (i.e. shipping and wildlife viewing) will not be collected.

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

All 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 June 20, 2017 (82 FR 28048I), solicited public comments. One comment was received. The Whale and Dolphin Conservation and The Humane Society of the United States wrote a joint letter of support for this proposed research.

Response: We agree that a survey of recreational viewing operations in SBNMS will provided updated information.

The survey will be conducted for SBNMS and the surrounding region. The remaining 27 operations may be operating in the larger region. The estimate of 40 operations is based on a study completed by IFAW in 2008.

We plan to conduct the on-site survey using volunteers. However, the commenters are correct in that there will be mailing and printing costs. The cost estimate will be adjusted accordingly.

There will be an importance/satisfaction section on the survey. We will have conversations with the site to determine if an expectation module of questions would be useful. However, interviewing respondents both before and after the whale operation will increase the amount of time, number of volunteers and printing costs associated with this survey. This is not something we are able to accommodate.

As with all sanctuary socioeconomic analysis a detailed technical appendix of survey development, implementation and analysis will be developed and peer reviewed prior to publication. Further, all data is available for public request subject to privacy protocols and policies.

Lastly, the commenter discusses concerns with in-person interviews after whale watching trips. Sanctuaries has engaged in interviewing respondents after recreational trips and in many locations has worked with state, local and private business to obtain necessary permissions for interviewing respondents. If necessary, we will reach out to the appropriate Harbormasters to obtain permission.

The draft survey was also presented to a few local operators in SBNMS, the Marine Mammal Commission, Allison of Whale SENSE, and National Marine Fisheries Service (Kristy Wallmo). Feedback was received and incorporated into the final survey. The feedback generally included comments about question wording, organization and questions about wildlife harassment.

**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**

Procedures have been established to protect the proprietary information provided by respondents. Emerson College will be collecting and storing the data on their servers. Volunteers will conduct the surveys and furnish the data to Emerson. All volunteers will receive training and instructions from Emerson on how to work with PII and maintain its security. In the pending contract with Emerson (to be finalized by the National Marine Sanctuary Foundation) language is included that

instructs Emerson on how to protect the data. It will be specified that Emerson College will, upon completing the survey, destroy all information linking the operators/businesses with the data. In addition, Emerson will be instructed that they cannot send the database identification numbers and links to the operation/businesses to anybody (including NOAA). Prior to sending the data to NOAA, Emerson will remove all PII. They will not provide the survey data to the public, but the public will be able to request the data without PII from NOAA. Once the contract has been awarded, NOAA will submit a change request to OMB describing the measures that the contractor will take to secure the data from unauthorized disclosure.

Here is an excerpt from a recent charter dive operator survey contract: The on-site sampling data shall also be inputted into either an Excel spreadsheet or Microsoft Access or Dbase database. The contractor shall remove any identifying information on individual operators and vessels, before transferring to NOAA. Individual boat identification shall be used by the contractor only in checking on-site sampling data with charter boat dive log information. The codebook containing the database identification codes and corresponding dive operation shall not be given to anyone outside [the contractor]. [The contractor] will destroy the codebook on completion of the data collection and database entry.

Further, each individual respondent will be assigned an identification number in the database so the data from different portions of the survey can be linked for analysis. Release of proprietary information is further protected by the [Freedom of Information Act](#) (5 USC 522 (b) (4)) concerning trade secrets or proprietary information, such as commercial business and financial records. All non-personal or non-proprietary information will be available for distribution. This data will be removed of any personal identifying information before being shared to protect the information of each individual and business. Further, a privacy act statement is included on the survey for respondents to review.

**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.**

We are asking information about the number of passengers and their spatial use of the sanctuary and larger region. This information is necessary to estimate the total number of person-days spent viewing wildlife operations via for-hire operations. This information will also be used to inform a second submission to survey passengers within SBNMS. The two data collections together will allow us to estimate the cumulative impacts to the local economy from wildlife viewing in SBNMS.

The site staff has had conversations with the whale watching SBNMS Sanctuary Advisory Board representatives and several operators about this survey. They seemed interested and willing to participate.

Also, please see above response of A10 for protecting information.

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

The affected public for this collection are the owners or managers of whale/marine wildlife watching businesses in the Stellwagen Bank Region. We estimate that there are 12 or fewer relevant businesses in the region. We expect that it will require an average of 1.75 hours of interview/record compilation time to complete each data collection per respondent. This time can be roughly divided into 45 minutes for record compilation by the respondent in preparation for the interview, and then 1 hour of working with our interviewers to fill out and check the forms completed during the actual interview. We anticipate completing interviews with the entire population of commercial whale/marine wildlife watching operators in the study area. We anticipate full cooperation with the clear understanding that responses to the survey questions remain anonymous. The members of this business community are interested in understanding their contribution to the local economy and the value of wildlife to their operation. **Thus, we are requesting a maximum of 21 burden hours for this collection.**

**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 beyond burden hours.

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

FY 2018. Federal Staff Time \$20,000. Contract staff time \$25,000. Travel Costs \$10,000

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

There are no program changes or adjustments.

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

All reports will be peer reviewed per NOAA standards under the Information Quality Act and posted on the ONMS Socioeconomic Web site:

<http://sanctuaries.noaa.gov/science/socioeconomic>

A new page(s) will be set up on this website to provide the project report to the general public. All data and documentation will be put on CD-ROM and will be made available to the general public, subject to any masking of the data required to protect privacy.



**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.