

## 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 commercial wildlife viewing passengers to ascertain the economic 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, user demographic profiles, importance/satisfaction of wildlife viewing trips and expenditures of trips that involve wildlife viewing has never been collected in this region. Thus, current information on the importance/satisfaction of marine wildlife viewing and the expenditures generated from these activities is needed. **The primary focus for the survey will be to gather data on the non-consumptive, importance/satisfaction and expenditures of marine wildlife viewing passengers.** Specifically, researchers will collect data to help determine the contribution of marine wildlife watching passengers to the economy in the Stellwagen Bank region. Expenditures will be used in IMPLAN to estimate the economic contributions of the activity to the regional economy (jobs, income, GDP and value-added). IMPLAN is an input-output modeling software that takes expenditure data in combination with Bureau of Economic Analysis data to provide estimates about economic contributions (jobs, income, GDP, value-added).

Passengers of wildlife viewing vessels include whale watching, seabird charters, kayaking, SCUBA diving, seal and great white excursions, 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.

**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, seals, and seabirds within the sanctuary and the surrounding region, 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 operation passengers and will be used to develop social and demographic profiles of passengers, measure their attitudes and preferences and their expenditures.

The unit of measurement is the passenger. The only personally identifiable information that may be collected is their e-mail address. This survey will be implemented via paper versions and online. For respondents who select the paper version, no PII will be collected. For those who choose the online version, their e-mail address will be collected so that we can send them a reminder e-mail with the survey link and their respondent ID number. The PII will not be included in the respondent's survey record and will be maintained by Emerson College and destroyed at the end of the data collection. The PII will not be shared with anyone outside of Emerson College.

**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 surveys will be conducted by staff and graduate students at the Emerson College in Boston, MA. SBNMS will use this data to inform their upcoming management plan update.

**How frequently will this information be used?**

This information will be collected this year (2018) and possibly in 2020 or 2021 to monitor any changes in expenditures or attitudes over time. It is anticipated that the data gathered from this collection will be used on an as-needed basis. Some of the elements of this submission may be replicated to support socioeconomic monitoring in future years.

**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.

### **Compliance with Information Quality Guidelines**

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. 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.

### **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.**

Respondents may complete the surveys online or on paper.

### **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 passengers 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 passengers 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 from 2008.

Researchers conducted a literature review to determine if and to what extent existing information might meet the needs of SBNMS. There are currently no surveys in progress (other than this one) and none that have been completed within the past ten years to address the attitudes and perceptions and economic contributions that wildlife viewing passengers make to the sanctuary.

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

A few wildlife viewing operations were contacted in advance to notify them of intent to conduct this data from their passengers. They stated they prefer the data collection to occur on the vessels and not at the port after the vessels return. Also, a couple of operations were contacted about the survey to receive their feedback.

**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.

**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. Our response is listed at the end of this document.

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 personal information provided by respondents. All personal identification information will be removed from all databases sent to NOAA or distributed to the public. 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. Any personal identifying information and proprietary information will be removed before data is shared, to protect the information of each individual and business. The SORN is on the screener in the privacy act statement: COMMERCE/NOAA-11, Contact Information for Members of the Public Requesting or Providing Information Related to NOAA's Mission. Amended version published January 12, 2017 (82 FR 3721), became effective February 21, 2017.

**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 such questions will be asked.

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

The affected public for this collection are the passengers of marine wildlife watching businesses in the Stellwagen Bank Region. There are two seasons of interest for data collection; the summer and the spring/fall season. Our goal is to receive 500 completed surveys in each season. Based upon past response rates for similar surveys, we expected a 40% response rate for the expenditure

surveys and a 60% response rate for the importance/satisfaction questionnaire when they were separate; for this application, they are one survey so we expect a 50% response rate. To do this, 1,000 persons must take the screener (e-mail address and a couple of demographic questions) in each season. We do not know if there will be a difference in response rates between the mailback and online versions.

Season	Screener (time/survey)	Importance/Satisfaction & Expenditure Survey Expected # of Respondents (time/survey)	Total Burden Hours
Summer	1,000 (2 minutes)	500 (20 minutes)	200 hours
Spring/Fall	1,000 (2 minutes)	500 (20 minutes)	200 hours
Total Burden Hours	66.7 (67) hours	333.33 (333) hours	400 hours

Thus, we are requesting a maximum of 400 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 \$2,000. Contract staff time \$10,000. Travel Costs \$5,000.  
Total: \$17,000.

**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.

## Response to Comments: WDC & The Humane Society of the United States

We agree that a survey of recreational viewing operations in SBNMS will provide 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.