

**SUPPORTING STATEMENT
COASTAL HOUSEHOLD TELEPHONE SURVEY (CHTS)
OMB CONTROL NO. 0648-XXXX**

A. JUSTIFICATION

This request is for a new information collection, to implement the Coastal Household Telephone Survey (CHTS) in Puerto Rico, Hawaii, and all states along the Atlantic and Gulf Coasts, with the exception of Texas.

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

Collection of recreational fisheries catch and effort data is necessary to fulfill statutory requirements of Section 303 of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (16 U.S.C. 1852 *et. seq.*), which requires that conservation and management measures prevent over fishing while achieving, on a continuing basis, the optimum yield from each fishery, and also to comply with [Executive Order 12962](#) on Recreational Fisheries. Section 303 (a) of the Magnuson-Stevens Act specifies data and analysis to be included in Fishery Management Plans (FMPs), as well as pertinent data that shall be submitted to the Secretary of Commerce under the plan.

Recreational fishing catch, effort and participation statistics are fundamental for assessing the influence of fishing on any stock of fish. The quantities taken, the fishing effort, and the seasonal and geographical distribution of the catch and effort are required to assess the health of fish stocks and develop and evaluate national fisheries management policies and plans. Recreational fisheries data are essential for the National Oceanic and Atmospheric Administration's (NOAA) Fisheries, the Regional Fishery Management Councils, the Interstate Fisheries Commissions, State conservation agencies, recreational fishing industries, and others involved in the management and productivity of marine fisheries. The allocation of fishery resources depends on the results of these surveys.

Traditionally, recreational fishing effort data (number of fishing trips) have been collected through the Coastal Household Telephone Survey (CHTS) (previously under OMB Control No. 0648-0052). The CHTS utilizes a list-assisted, random digit dialing (RDD) telephone survey approach to contact residential households and collect information about saltwater fishing activity. Contacted households are screened to determine if any household members participated in marine recreational fishing during the previous two months, and each active angler is asked to recall the number of saltwater fishing trips that were taken during the two-month wave, as well as provide details about each trip.

In recent years, the efficiency and effectiveness of RDD surveys in general, and the CHTS specifically, have been questioned due to declining rates of coverage and response. The NMFS has addressed these concerns by implementing the Marine Recreational Information Program (MRIP) and developing and testing alternative survey designs. Over the past several years, under OMB Control Numbers 0648-0052 and 0648-0652, NMFS has sequentially tested several alternatives to the CHTS with a goal of replacing the CHTS with a more accurate and efficient survey of recreational fishing activity. This testing has culminated in the most recent design of

the MRIP Fishing Effort Survey (FES) (OMB Control No. 0648-0652), which has been approved as an eventual replacement to the CHTS for monitoring recreational fishing effort.

The FES is less susceptible than the CHTS to biases resulting from non-sampling errors. However, current fishery management regulations, including allowable catch limits, are based upon estimates derived from the CHTS. Sole use of a different data collection design (e.g., the FES) to monitor fishing effort and catch relative to catch limits could result in over fishing (over exploitation) or premature closures of fishing seasons (under exploitation). In addition, the CHTS has provided an uninterrupted, 30-year time-series of recreational fishing effort (and catch¹) estimates that are incorporated into mathematical models assessing the status of fish stocks and predicting how fish stocks will respond to management measures (e.g., catch limits, fishing season, etc.). As with most time-series analysis, the power of these models is dependent upon the length of the time series – the longer the time series, the more powerful the models. Interrupting the existing time series of estimates by switching directly from the CHTS to the FES will limit the effectiveness of assessment models. Consequently, we plan to continue the CHTS for a period of up to three years to benchmark CHTS and FES estimates and develop calibration methods to support the transition from the CHTS to the FES.

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.

CHTS estimates will be used to monitor recreational fishing effort. Recreational fishing catch and effort data are used on an ongoing basis by NMFS, regional fishery management councils, interstate marine fisheries commissions and state natural resource agencies in developing, implementing and monitoring fishery management programs, per statutory requirements of the Magnuson-Stevens Fishery Conservation and Management Act. Catch and effort statistics are fundamental for assessing the influence of fishing on any fish stock. Accurate estimates of the quantities taken, fishing effort, and both the seasonal and geographic distributions of the catch and effort are required for the development of regional management policies and plans.

In addition, information collected through the CHTS will be used as a comparison to assess the effectiveness of the FES data collection design for collecting recreational fishing effort data and subsequently estimating recreational fishing participation and effort. Overlapping the CHTS and FES will provide an opportunity to evaluate potential sources of survey error for the two survey designs. Finally, the two surveys will produce independent estimates of recreational fishing effort. Any measureable differences in estimates will be assessed within the context of survey errors. Results of the comparisons will be used to calibrate historical CHTS effort estimates and minimize disruptions to the historical time-series of recreational fishing estimates as NMFS transitions from the CHTS to the FES.

Specific data elements that will be collected in the CHTS include:

- a) A screener question about recreational fishing activity to identify eligible fishing households,
- b) Total number of household residents,

¹ Estimates of total fishing catch are the product of fishing effort (trips) and catch-per-trip.

- c) Gender of respondent,
- d) Total number of household landline telephone numbers,
- e) Questions about fishing activity in the past 12 months and 2 months are used to screen for recent fishing activity and assist with recall,
- f) The number of recreational fishing trips taken on privately owned boats, and number of shore fishing trips taken during the reference wave will be used to estimate fishing effort.

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

The CHTS will be conducted by telephone. This telephone survey requires interviewer-mediated reporting of data by respondents in order to minimize item non-response and maximize accuracy of the collected data. It also requires use of computer-assisted telephone interviewing (CATI) methods which greatly reduce response errors and data entry errors.

4. Describe efforts to identify duplication.

The National Marine Fisheries Service (NMFS) collaborates with state natural resource agencies and regional interstate fisheries commissions on the Atlantic and Gulf coasts to ensure that recreational fisheries data collections are not duplicative. Every five years, the Fish and Wildlife Service (FWS) of the U.S. Department of the Interior conduct the National Survey of Fishing, Hunting and Wildlife – Associated Recreation (OMB Control No. 1018-0088). This survey collects minimal information about annual recreational saltwater fishing activity within the context of additional recreation activities. That survey does not provide the spatial or temporal resolution needed by managers of fishery resources to monitor and manage recreational fisheries landings.

The Coastal Household Telephone Survey (CHTS) will overlap with the MRIP Fishing Effort Survey (FES) (OMB Control No. 0648-0652), which is a dual-frame mail survey that collects similar information. Ultimately, the FES will replace the CHTS. It is expected that effort estimates derived from the FES may be very different from historical CHTS estimates. Failure to understand and account for these differences may result in undesirable consequences, such as shortened fishing seasons or quota overages. The surveys will overlap for a period of up to three years to benchmark estimates and develop appropriate calibration factors.

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

No small businesses will be impacted by this survey. Respondents are individuals or households.

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

If the CHTS is not conducted, the NMFS will have to rely exclusively on the new Fishery Effort Survey (FES) design to collect data and estimate recreational fishing effort. It is anticipated that effort estimates derived from the new survey may be very different from historical CHTS estimates. Failure to understand and account for these differences may result in undesirable consequences, such as shortened fishing seasons or quota overages. Benchmarking the CHTS concurrently with the FES will ease the transition from one design (CHTS), which was used to establish current fishery management actions (e.g. annual catch limits) to another (FES), which will be used to monitor fishing effort (and ultimately landings) against annual catch limits.

An ongoing survey of recreational anglers is required to monitor changing conditions in the fishery and support modifications in fishery regulations both within fishing seasons and among fishing years. In addition, a continuous time series of data is scientifically essential to assess the impact of recreational fishing on fish stocks. If the survey were not conducted or conducted less frequently, NMFS and state natural resource agencies would experience difficulty in effectively carrying out their responsibilities to meet statutory, administrative, and other obligations to end overfishing of marine fishery resources.

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 was published on June 2, 2014 (79 FR 31308) for the Coastal Household Telephone Survey (CHTS) and public comments were solicited. The CHTS is an ongoing survey, but previously was included in the OMB Control No. 0648-0052.

Most of the comments received about this FRN notice questioned this survey being considered “new”. Response to these comments explained that the CHTS has not changed and is not “new”; however the submission was for a new, self-standing PRA clearance, which appears as something new, even though it is just a continuation of the existing survey.

Other comments about the CHTS (included as supplementary documents) were about the survey design (see comments posted as supplementary documents). There are concerns about the use of landline surveys and excluding cellular phones from the data collection, which are consistent with the concerns of the National Research Council (NRC) and others who have reviewed the recreational fishing data collection programs administered by NOAA Fisheries. Responses were made directly back to the commenters in a timely manner with an explanation of what the plan is for the CHTS in the future. It was explained that the CHTS will be conducted concurrently with the new Fishing Effort Survey (FES) design for a period of time to ease the transition from one design (CHTS), which was used to establish current fishery management actions (e.g., annual catch limits) to another (FES), which will be used to monitor fishing effort (and ultimately landings) against annual catch limits. It is expected that effort estimates derived from the new survey may be very different from historical CHTS estimates and failure to understand and account for these differences may result in undesirable consequences, such as shortened fishing seasons or quota overages.

MRIP is a collaborative effort among government agencies, independent scientists, recreational fishing groups and conservation organizations to ensure scientifically rigorous collection of appropriate information that meets manager and stakeholder needs. Subsequently, MRIP staff members maintain regular communication with customers, through workshops, workgroup meetings and one-on-one consultations. For example, The MRIP Executive Steering Committee (ESC), which includes senior managers from NOAA Fisheries, the Executive Directors of the Interstate Marine Fisheries Commissions, and a representative from the Marine Fisheries Advisory Committee, provides general oversight of MRIP and ensures that the program satisfies Federal, state and stakeholder needs for recreational fishing statistics. The ESC meets annually to review program activities, strategically allocate funds to addresses data needs and approve research priorities. Similarly, the MRIP Operations Team (OT), which is responsible for developing and testing improved data collection designs, includes representatives from NOAA Fisheries headquarters, regional offices and science centers, the Interstate Marine Fisheries Commissions and state natural resource agencies. The OT meets 1-2 times each year to identify regional and state needs for recreational fishing statistics and develop research priorities. Finally, MRIP staff participate in numerous meetings sponsored by regional fishery management councils and state natural resource agencies to update fishery managers, scientists and stakeholders on program accomplishments and collect feedback about data needs and concerns about the program.

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

Neither payments nor gifts to respondents, other than remuneration of contractors, are given under this program.

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

As stated on the questionnaire, responses are kept confidential as required by section 402(b) of the Magnuson-Stevens and [NOAA Administrative Order 216-100](#). Confidentiality of Fisheries Statistics, and will not be released for public use except in aggregate statistical form without identification as to its source. 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. Data such as personal addresses and phone numbers will remain confidential.

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.

The estimated response burden in hours for the 2015 CHTS is 7,600 hours with an expected number of respondents of 228,000. Estimated burden hours were calculated using data from past CHTS wave reports which show that the average amount of respondent time per interview is two minutes. Household telephone numbers are not sampled more than once per calendar year.

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).

These data collections will incur no cost burden on respondents beyond the costs of response time.

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

Annual cost to the Federal government is approximately \$1,762,440. The 2015 CHTS will be conducted under an existing Firm Fixed Price contract. The cost is a unit price of \$7.73 which includes labor and operational expenses (equipment, overhead, and staff support) multiplied by the quantity of completed interviews required (228,000).

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

This is a new program.

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

Each year, the NMFS administers recreational fishing surveys for six discrete, two-month reference waves, beginning with wave 1 (January/February) and continuing through wave 6 (November/December). The CHTS will be administered alongside the FES for a period of up to three years to benchmark estimates and develop appropriate calibration factors.

Data collected and analyzed by the CHTS will be included in table format available on the Web page of the Fisheries Statistics Division, Office of Science and Technology, National Marine Fisheries Service. The Web site address is <https://www.st.nmfs.noaa.gov/recreational-fisheries/index>. The data collected and analyzed by the FES will be kept and used in-house as a comparison against the CHTS data and estimates.

Findings from the studies will be presented at appropriate professional meetings (e.g. American Fisheries Society, Joint Statistical Meetings) and will be submitted for publication in appropriate statistical or fisheries peer-reviewed journals.

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.