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May 28, 2013

Jennifer Jessup  
Department of Paperwork Clearance Office  
Department of Commerce, Room 6616  
14<sup>th</sup> and Constitution Ave, N.W.  
Washington, DC 20230

**RE: 28 FR 20296: Proposed Information Collection: Marine Recreational Information Program Fishing Effort Survey**

Dear Ms. Jessup:

Ocean Conservancy<sup>1</sup> appreciates this opportunity to provide comments on the Proposed Information Collection: Marine Recreational Information Program Fishing Effort Survey to be performed by National Marine Fisheries Service Office of Science and Technology (NMFS OST).<sup>2</sup> We are encouraged that NMFS OST is actively testing new and innovative methods to better capture and characterize marine recreational fishing effort through the Marine Recreational Information Program (MRIP). These data are critical to calculation of recreational fishery estimates and successful fishery management.

Ocean Conservancy supports the efforts of MRIP; the proposed information collection tool is warranted and necessary to better inform fishery managers, scientists and stakeholders regarding effort of the marine recreational fishery.

The Federal Register notice invited comment on four topics: (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

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<sup>1</sup> Ocean Conservancy is a non-profit organization that educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

<sup>2</sup> 78 Fed. Reg. 20296 (April 4, 2013).

## Summary Recommendations:

- (a) The proposed collection of information is essential to the proper performance of agency functions and integral to increased understanding of angler attitudes and preferences.
- (b) The proposed survey instrument is sufficiently concise and should allow for respondents to complete the survey in the estimated time.
- (c) NMFS should consider adding questions relating to angler effort from private access points, such as private docks and marinas.
- (d) Efficiency and reduction of costs could be achieved if the survey were electronic.

## Detailed Recommendations:

### *Item (a)*

Sections 303 and 401 of the Magnuson-Stevens Fishery Conservation and Management Act require collection of catch and effort data from the marine recreational fishery.<sup>3</sup> The effectiveness and efficiency of the Coastal Household Telephone Survey, used to collect fishing effort data for MRIP, is questionable due to concerns such as non-response and of cell phone-only households whose numbers are not published.<sup>4</sup> The National Research Council's (NRC) 2006 Review of Recreational Fisheries Survey Methods issued several recommendations to enhance efficiency and reduce bias to the telephone survey.<sup>5</sup> As indicated in several MRIP pilot projects, the use of a mail based survey for effort has a higher response rate than does the traditional telephone survey.<sup>6,7</sup> Exploration of new methods to increase marine recreational angler effort survey efficiency and completion rates is critical to success of MRIP. Additionally, this new tactic to gather angler effort data addresses recommendations in the NRC Review of Recreational Fisheries Survey Methods.<sup>8</sup> New and innovative approaches to collect effort data are a distinct need for MRIP and may serve to increase survey participation, reduce non-response and increase estimate precision.

### *Item (b)*

The survey is sufficiently succinct and easy to complete. Respondents should be able to finish the questionnaire with little difficulty in the estimated time noted in the Federal Register notice.<sup>9</sup> However, Ocean Conservancy is concerned that the survey may under-represent non-English speaking households, as the questionnaire appears to be available only in English.

### *Item (c)*

The scope the mail-based survey is well thought out. The survey itself is simple and concise, and respondents should not feel overburdened to complete it.

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<sup>3</sup> 16 U.S.C. §§ 1853, 1881.

<sup>4</sup> Brick, J. M., et al. 2012. A Comparison of Recreational Fishing Effort Survey Designs. Retrieved from <https://www.st.nmfs.noaa.gov/mdms/public/finalReport.jsp?ReportID=362>

<sup>5</sup> National Research Council. 2006. Review of recreational fisheries survey methods. Committee on the Review of Recreational Fisheries Survey Methods, National Research Council. The National Academies Press. 187p.

<sup>6</sup> Andrews, W.R. et al. 2010. Pilot test of a dual frame two-phase mail survey of anglers in North Carolina. Retrieved from [http://www.countmyfish.noaa.gov/projects/downloads/Final\\_Report%20NC%202009%20Dual%20Frame%20Two%20Phase%20Experiment.pdf](http://www.countmyfish.noaa.gov/projects/downloads/Final_Report%20NC%202009%20Dual%20Frame%20Two%20Phase%20Experiment.pdf)

<sup>7</sup> Brick, J. M., et al. 2012. A Comparison of Recreational Fishing Effort Survey Designs. Retrieved from <https://www.st.nmfs.noaa.gov/mdms/public/finalReport.jsp?ReportID=362>

<sup>8</sup> National Research Council. 2006. Review of recreational fisheries survey methods. Committee on the Review of Recreational Fisheries Survey Methods, National Research Council. The National Academies Press. 187p.

<sup>9</sup> 78 Fed. Reg. 20296 (April 4, 2013).

As this survey does not present too much burden on anglers, Ocean Conservancy suggests MRIP consider add-on questions to better identify anglers who fish also in private access modes. Private docks and marina angler effort is difficult to quantify, and few studies have characterized catch and effort in these modes. We feel more attention should be paid to these modes; potentially through add-on surveys in future iterations of this effort survey. The NRC's 2006 review recommended that add-on surveys be more tightly focused to create a better sampling frame.<sup>10</sup> The proposed survey could be modified to ask a questions relating to whether angler fishing trips originated from private or public access and the number of days fished. This information could, at minimum, be used to better characterize private access effort, from which a potential MRIP pilot could be developed so we may better understand this unsampled mode.

***Item (d)***

One concern with mail-based surveys is response time, most notably delays related to return via United States Postal Service (USPS) and data processing. If transit of the data from respondent to NMFS OST is in any way interrupted (e.g. weather, facility sorting, etc.), delays can accrue in data entry time. An additional concern relating to timely submission is the added time required for data entry. To increase timeliness and help encourage efficiency, we suggest offering respondents the option of completing the survey on-line. Use of an electronic, internet-based survey would reduce operational costs and cut down on time loss due to data entry. While we understand the initial phase of the survey will not include this option, the internet is a viable option for completion and transmission of this survey and the NRC report recommended internet based surveys as a method for anglers to submit data.<sup>11</sup> We recommend MRIP investigate internet based submission as an alternative or a means to replace the return of this survey via USPS.

We thank NMFS and the Department of Commerce for allowing Ocean Conservancy to comment on this forthcoming survey. Angler attitudes and preference data is intrinsic to better management of the resource and will allow managers to make better decisions regarding our nations fishery resources.

Sincerely,



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cc: Rob Andrews

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<sup>10</sup> National Research Council. 2006. Review of recreational fisheries survey methods. Committee on the Review of Recreational Fisheries Survey Methods, National Research Council. The National Academies Press. 187p.

<sup>11</sup> *Id.*