# SUPPORTING STATEMENT

**U.S. Department of Commerce**

**National Oceanic & Atmospheric Administration**

**Marine Recreational Fishing Expenditure Survey (MRFE)**

**OMB Control No. 0648-0693**

**SUPPORTING STATEMENT PART A**

# Abstract

This request is for a revision and extension. The revision consists of updating the demographic questions to adhere to the new OMB approved demographic questions under the Statistical Policy Directive on 3/29/24 and updating sample sizes and burden hours based on recent fishing license data. Marine recreational fishing is a popular pastime across the United States (U.S.) that generates economic activity and benefits to local communities, state economies, and to the nation. The National Marine Fisheries Service (NMFS) is required to provide economic data and analysis on recreational fishing for use in fisheries management. The purpose of this data collection is to gather information on marine recreational anglers’ expenditures on fishing trips and durable goods related to fishing. These data are used in fisheries management analyses by state fisheries agencies, regional fishery management councils, and NMFS to understand the economic effects of fisheries regulations and policies. The survey will target marine recreational anglers in all coastal states. As the survey is conducted across all coastal states and specifically targets marine recreational fishing, the benefits are that it can provide comparable data across states and at a national level and is easily available to federal and state agencies who need timely economic information on marine recreational fishing. Results of the survey are also used in NMFS economic reports, by other NOAA and Department of Commerce offices, by academic researchers, and a wide variety of other groups and constituents interested in marine recreational fisheries.

# Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Marine recreational fishing is a popular pastime across the United States (U.S.) that generates significant economic contributions to both local communities, state economies, and to the nation. 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 as reauthorized in 2007 (16 U.S.C. §1801 et. seq.). NMFS is required to enumerate the economic impacts of the policies it implements on fishing participants and coastal communities. In order to routinely fulfill this mandate and in recognition of the economic and social importance of recreational fisheries, NOAA conducts economic surveys on marine recreational anglers. The proposed data collection will be a continuation of the data collection approved under OMB Control No. 0648-0693.

Specifically, the MSA states “Conservation and management measures shall, consistent with the conservation requirements of this chapter (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities” (16 U.S.C. §1851 (a)). Additionally, the MSA specifies that a fishery management plan must include a fishery impact statement that includes the social and economic impacts of conservation and management measures for participants in the fishery and fishing communities (16 U.S.C §1853 (a(9))). In addition to the MSA, the Modernizing Recreational Fisheries Management Act of 2018 (“MRFMA”; Public Law 115-405) states that economic factors are important criteria to be used in fisheries allocation decisions in mixed use fisheries (having both commercial and recreational sectors). In addition to laws regarding economic analysis for fisheries, the Regulatory Flexibility Act (RFA), and Executive Order 12866 (E.O. 12866) also mandate economic analysis by federal government agencies. A separate document with a summary of these laws and regulations is included with this submission.

# Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Description of the data collection

The primary objectives of this data collection are to 1) collect trip expenditures for an angler’s most recent marine recreational fishing trip and 2) to collect annual expenditures on durable goods used for marine recreational fishing. Additional objectives include obtaining a brief description of the most recent marine recreational fishing trip and collecting limited demographic information on marine recreational anglers.

The data collection is titled the “National Marine Recreational Fishing Expenditure Survey”.

The population targeted by this survey will be marine recreational anglers, 16 years of age and older, who fish in any of the coastal states along the Atlantic, Pacific, and Gulf of Mexico coastlines[[1]](#footnote-2). Both residents and non-residents of these states will be included. The survey will target the general recreational angler as well as those anglers who specifically target highly migratory species (HMS) such as tunas, billfish, and sharks and who must hold a HMS recreational angler permit issued by NMFS. As HMS trips typically involve longer offshore distances and specialized fishing gear, the expenditures for HMS trips are often different than those for non-HMS trips.

The survey will be conducted in two phases. One phase will focus on trip expenditures and will collect information on expenditures on an angler’s most recent fishing trip and trip characteristics (including mode of trip). The second phase will collect information on an angler’s annual expenditures on durable equipment used for marine recreational fishing, angler demographic information, and information on their fishing experience. The survey is conducted regularly every 3 to 5 years. NMFS has conducted nationwide surveys since 2006. Before 2006, three regional surveys were conducted starting in 1998 with the Northeast Region, the Southeast Region in 1999, and the Pacific Region in 2000. Since 2006, the majority of the questions have remained consistent, with a few minor wording changes to clarify specific questions. Other changes to the survey since 2011 have included adding a web-based survey option or using electronic capture for in person interviews (via mail and paper based field data collection), and providing the survey invitation via email in order to keep up with current best survey practices.

Trip Expenditures and Trip Characteristics

For the states where NMFS or its state partners conduct an interviewer based access point angler-intercept survey (APAIS), an economic add-on will be added to the existing catch survey questionnaire approved under OMB Control No. 0648-0659 and will be conducted in two month waves throughout the calendar year consistent with the survey sampling design described for that information collection, which includes the states along the Atlantic Coast from Maine to Florida, as well as Mississippi and Alabama.

The APAIS survey is not conducted in Texas, Louisiana, California, Oregon, Washington, Hawaii, and Alaska. With the exception of Hawaii, state recreational fishing license frames will be utilized to obtain angler contact information for a dual mode web/mail survey. The HMS permit/license frame will also be used to send surveys to the HMS permit holders in the Atlantic and Gulf coast states. A specific HMS version of the web survey will be used for HMS permit anglers and will ask about their most recent fishing trip targeting HMS species. The HMS version will be entirely online as all permit holders are required to provide an email address as part of the permit.

In Hawaii, there is no state fishing license required so the sample frame is developed using two methods. The first is to use the state recreational boating license frame for private anglers. The second is for NMFS to develop a sample of anglers who fish from charter/for-hire boats. Following established methodologies and efforts implemented in the previous Hawaii recreational fishing expenditure surveys, charter patron volunteer participants will be collected with assistance from a contracted outside vendor based in the state. Hawaii charter fishing trips occur on a daily basis at designated ports. Charter operators run half-day and full-day charters on rather consistent schedules, making it easy to know when charter patrons will return to port. NMFS will randomize sample visits based on port, day of the week, and trip type (half day, full day) and on a given sample day collect contact information (email and/or mailing address) from willing charter boat patrons for inclusion in the survey population.

For the states where APAIS is not conducted, email or text message invitations to the surveys will be the primary mode of contact with links to the online survey. However, for those anglers without email addresses or cell phone numbers in the license frame, NMFS will employ a mail push to web format, with a final contact with paper questionnaires via mail for a small sample of those that do not respond via the web based survey. The web/mail survey of anglers will be conducted in two month waves to ensure a representative sample of trip expenditure data from throughout the year.

The questionnaire regarding trip expenditures will include the following questions:

* Date of most recent fishing trip,
* mode of fishing (e.g., shore, private boat, or for-hire vessel),
* location of trip (city and state),
* target species (or type of fishing gear and used level of fishing effort for the Hawaii version),
* (CA only) if on a boat based trip, whether or not the angler was fishing in US waters only, non-US waters only (e.g. Mexico); or both (this is needed to make sure we do not include trips occurring only in non-US waters);
* number of people traveling and fishing together,
* whether or not anglers were on an overnight trip, and if on an overnight trip, then they are asked the number of nights they were away from home, the number of days fished on the trip, and the primary purpose of the entire overnight trip (fishing, business, or personal),
* the number of total trips in the past 12 months (or totals by mode in the past 12 months for Hawaii only),
* expenditures related to fishing trip, including costs such as auto fuel, auto rental, public transportation (airfare, bus, taxi, subway, ferry), lodging, food (from grocery stores and from restaurants), bait, ice, boat fuel, guide fees, tips to crew, fish processing, gifts or souvenirs, and tournament expenses, and
* the percentage of trip expenditures that are spent in the state of the most recent fishing trip.

The data collected are used to estimate expenditures on an angler-trip basis, defined as one day of fishing for one angler. In the survey, anglers are asked to estimate total expenditures for the entire trip away from their permanent residence if the trip involved an overnight stay. Data on the number of nights anglers spent away from their permanent or seasonal residence and the number of days spent fishing is collected and used to calculate expenditures per angler-trip. The percentages spent in the state of the trip are multiplied by each trip expenditure category to calculate the final expenditure per respondent spent in the state of the trip. Data on location of trip, species targeted, and number of people traveling and fishing together as well as the primary purpose of the trip and the total number of trips per year are collected to more fully understand how the different types of trips anglers are taking influence their expenditures and also allow for more nuanced expenditure calculations (e.g. expenditures for trips targeting a specific species) when needed for regulatory analysis. These questions also provide context for expenditures and can provide additional means of internal error checking.

Durable Goods Expenditures

The sample frame for the durable good expenditure questions will be angler license frames in all coastal states except Hawaii, and the HMS permit frame. The state of Hawaii does not require marine non-commercial fishermen to obtain a fishing license. This lack of a survey population frame complicates non-commercial fishing research and requires NOAA researchers to find another way to survey the angler population. The sample frame for this survey will be boat based license registries maintained by the state of Hawaii. In 2015, the state of Hawaii added a question on the boat registration form that asked if the recreational boat being registered was used for non-commercial fishing. All those registrations that answered yes to this question will be used as the sample frame as was done in the 2017 and 2022 trip expenditure survey. The survey will be conducted as a dual mode web/mail. Email or text message invitations to the survey will be the primary mode of contact with links to the online survey. For those without email, NFMS will employ a mail push to web format, with a final contact of paper questionnaires via mail for a small sample of those that do not respond via the web. Survey questionnaires will be similar in most states except for cover photos, state name, and reference to expenditures made in the specific state. The questionnaire regarding durable expenditures will include the following types of questions asking about purchases of durable goods in the prior 12 months the angler made in the state being surveyed:

* Expenditures on semi-durable goods such as fishing tackle and gear (fishing line, hooks, lures, etc.), rods and reels, fishing licenses, special clothing, publications (books, magazines, newspapers, etc.), camping equipment, binoculars, dues and contributions to fishing clubs, and processing or taxidermy costs; the percentage of these expenditures that were spent in the state; and the percentage of use of the item for marine recreational fishing,
* If the angler owns a boat used for marine fishing, if the boat is motorized and the length; boat-related expenditures include purchases of motorboats and accessories, non-motorized boats, boating electronics, mooring and storage, boat insurance, boat and trailer license and registration, and boat and trailer maintenance and repairs; the percentage of these expenditures that were spent in the state; and the percentage of use of the item for marine recreational fishing. Also asked are whether or not purchases were financed, new or used, and purchased from a broker or private party, and the percentage of repairs done by the owner,
* If the angler owns a vehicle used for marine fishing, vehicle-related expenditures include purchases of vehicles, insurance, license and registration, and maintenance and repairs; the percentage of these expenditures that were spent in the state; and the percentage of use of the item for marine recreational fishing. Also asked are whether or not purchases were financed, new or used, and purchased from a broker or private party, and the percentage of repairs done by the owner,
* If the angler owns a second home used for marine fishing, related expenditures include purchases of a second home, insurance, and maintenance and repairs; the percentage of these expenditures that were spent in the state; and the percentage of use of the item for marine recreational fishing. Also asked are whether or not purchases were financed, new or used, and purchased from a real estate agent or private party, and the percentage of repairs done by the owner, and
* Socioeconomic and demographic variables, including days spent marine fishing in the state in the past 12 months, gender, age, number of years the angler has been marine recreational fishing, race, annual household income, and education level.

A combined form for trip and durable expenditures for private boat/shore anglers will be used in Hawaii to appropriately address unique issues in identifying saltwater anglers in that state and to minimize burden hours in a location that has been historically difficult to survey. In 1996, the Magnuson-Stevens Fishery Conservation and Management Act’s National Standard 8 (NS8) specified that conservation and management measures take into account the importance of fishery resources to fishing communities, to provide for their sustained participation in fisheries and to minimize adverse economic impacts. Section C of the survey affords us the opportunity to monitor the demographics of the non-commercial fishing community in the State of Hawaii, understand the social and cultural value of fishing in the community, and the scale of fish being caught by non-commercial fishermen. These questions mirror questions asked in previous versions of this survey providing value in consistent monitoring over time. Additional questions ask about the size of the household, how many household members fished, total catch of fish in the prior 12 months in Hawaii, how important the fish are as a source of food, and the use of the fish caught in the prior 12 months in terms of caught and released, eaten, shared with friends or family, or sold. The estimated time to complete the Hawaii survey is the same as the comparable durable goods questionnaire in the other states.

Copies of the questionnaires are submitted with this PRA package (the trip add-on script and instructions and paper forms; the trip expenditures mail and web questionnaire for the license frame states (Louisiana as an example for other states), the trip expenditures questionnaire for California, the trip expenditure questionnaire for Hawaii charter trips, the combined trip and durable expenditures form for Hawaii, the durable expenditures mail/web questionnaire (Alaska is used as an example), the HMS trip expenditures questionnaire, and the HMS durables expenditure questionnaire). All reporting of survey results will conform to data confidentiality requirements. 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. After data has been processed and formatted subject to NOAA data archiving requirements, the general public will have access to the data through NOAA data archive websites where all personal identifiable information of anglers has been removed.

# How the information is used

NMFS will continue to regularly conduct a nationwide survey to gather marine recreational fishing expenditures data across the United States in order to have timely information on the economic expenditures of marine recreational fishers (e.g. anglers) and the contributions that these expenditures make to economies of local communities and coastal states. NMFS publishes regular NOAA Technical Memorandums based on the results of the data collection. These reports detail the survey methods, sampling strategies, and other procedures used to conduct the survey. The reports provide information for each state on specific expenditure categories, and shows both mean and total angler expenditures. The technical memorandum undergoes an internal NOAA review process for data quality, accuracy, and editorial standards[[2]](#footnote-3).

NMFS publishes annual marine recreational fishing expenditure estimates based on the survey data in the NOAA technical report series “Fisheries Economics of the United States (FEUS)”[[3]](#footnote-4). The survey data and results published in the NOAA technical memorandums and FEUS provide NMFS managers and regional fishery management councils with quantitative information on expenditures made by recreational marine anglers on recreational fishing trips and related durable equipment. NMFS and fishery management councils regularly refer to the information to understand the economic implications of decisions concerning fisheries management and the economic contributions of recreational anglers to the economy of their state and region. For example, if an annual catch limit is relaxed and anglers respond by taking more fishing trips, total trip based expenditures would likely increase and have a positive impact on the state’s economy. In the Northeast region for example, the expenditure data have been used in analyzing management decisions related to groundfish (e.g. cod and haddock), and on the economic impacts related to developing artificial reefs and wind energy areas which may increase fishing opportunities. Trip characteristic and angler demographic data are used to provide descriptive information on marine recreational fishing participants that can be used to describe the communities affected by regulatory actions. The demographic questions on the durable goods survey and the Hawaii trip expenditure survey allow us to assess sample representativeness by comparing the characteristics of our sample (e.g., avidity and demographics) to the characteristics of the population at large, or to other NMFS-sponsored angler surveys (e.g. Fishing Effort Survey) or surveys of anglers in general (e.g. US. Fish and Wildlife Service and state surveys).

NMFS economists who conduct the survey communicate multiple times a year with recreational fishing constituents, such as fisheries management council staff, recreational fisheries associations, charter captain groups, marine manufacturer representatives, and academics to discuss the survey and its results among other issues. NMFS has received a lot of positive feedback about the survey and it is well supported by the constituents. Also, numerous presentations about the survey objectives and results were given both before and after the previous surveys (in 2009, 2010, 2011, 2012, 201, 2014, 2015, 2016, 2019, 2023, 2024) at conferences of academic fisheries economists, regional fisheries commission meetings, and industry/constituent- based workshops.

NOAA Fisheries and other parts of NOAA refer to the survey results for a variety of purposes particularly for economic analyses of actions affecting recreational fisheries such as fishery disaster assessments or regulatory analyses, on NOAA websites related to recreational fishing, outreach materials, in responses to constituents’ requests or concerns, and in press releases. The annual estimates of expenditures are often cited by both NMFS leadership and by Department of Commerce leadership at public speaking events or press releases related to recreational fisheries. For example, information from the survey related to for-hire expenditures was used in analyzing the effects of Covid-19 on the charter fishing industry and in calculating the damages related to a number of fisheries disaster declarations. Additionally, other federal and state agencies as well as academic researchers routinely ask for information from these technical memorandums or for the survey data to conduct their own analyses. The results are also presented at academic conferences related to economics and/or fisheries.

1. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The trip expenditure and trip characteristic data collected via the access point angler-intercept survey (APAIS) is electronically collected by field interviewers who record anglers’ responses directly onto laptop computers during the interview with a paper form for backup if needed. For that portion of the survey that relies on license frames as the sample frame, the survey will be conducted as a dual mode web/mail survey with the preferred mode being the web-based survey. For the license frame surveys, respondents that have an email address associated with the angler fishing license databases will first receive an email invitation to the web survey. They will be provided with a unique username and password that takes them directly to the survey using a secure server. The invitations will clearly state that the survey is voluntary and anglers can opt out of the survey. Reminders to the email group sample will be sent via email and may also be sent to a sub-sample of these email non-responders via text messages for anglers who provided their cell phone numbers. Anglers without email addresses on file will receive a mail cover letter which will include a link to the web survey with a secure username and password and will ask them to go to the survey site and complete it online. Data entered via the web will be captured electronically at the time of entry and that should reduce errors in compiling the data in comparison to the mail surveys where data may be hand- entered by data entry staff. In 2022, for the most recent trip expenditure survey, the proportion of anglers who completed the web-based survey (license frame states) was 86 percent compared to 14 percent who completed the mail based (paper) survey instrument. For the HMS trip expenditure version, 100% responded via the web version.

The data that will be collected via the dual mode part of the mail survey will use automated, electronic, mechanical, or other technological techniques such as a mail merge to create personalized cover letters and mailing labels. The cover letter will involve the merging of the sampling database with prepared cover letters to create a personalized introduction to the survey. Survey responses for mail surveys will be automatically captured through optical character recognition (OCR), which will greatly increase the accuracy and efficiency of data collection.

1. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

Based on extensive discussions with other NOAA economists, both within and outside of NMFS, there is no substantive duplication of effort within NOAA that has been a consistent source of data for the length of time that this survey has been conducted (since 2006). This is the only marine angler expenditure survey conducted that gathers detailed information on both trip and durable expenditures by marine recreational anglers specifically at the state and nationwide level and that is conducted on a regular basis. Within NMFS, this data collection is coordinated by the Office of Science and Technology (OST) on behalf of all the regions to reduce duplication of effort and expense and to ensure a consistent set of data across states. OST coordinates with the other NMFS recreational fisheries economists to develop and conduct the survey. The Alaska Fisheries Science Center has in the past collected similar information for anglers fishing in specific Alaskan regions as part of other surveys targeting narrow fishing sectors, but typically includes only a smaller geographic area of the state and uses the same expenditure questions as the nationwide survey for consistency. Since 2006, state fisheries agencies have partnered with NMFS to provide license frames for the expenditure survey; therefore they are aware of the NMFS survey effort. NMFS economists frequently talk with their state contacts and have not been informed of any similar state level surveys on the scale of the NMFS survey. Due to few state agencies having economists on staff and with limited resources, state agencies rarely, if ever, conduct surveys on marine anglers to estimate expenditures or economic contributions.

The Fish and Wildlife Service (FWS) of the U.S. Department of the Interior conducts the National Survey of Fishing, Hunting and Wildlife-Associated Recreation (“NSFHWR”) under OMB Control No. 1018-0088 every 5 years. NMFS economists have established good working relationships with the economist that leads the NSFHWR and talk every few months to discuss progress and practices for both surveys. Based on discussions with USFWS, NMFS is aware of their survey plans for future surveys as well as their methods and results from previous surveys. NSFHWR collects similar information about angler expenditures within the context of additional recreation activities (such as freshwater fishing and hunting). According to USFWS, future versions of the survey will not produce separate estimates of expenditures by freshwater and saltwater fishing, and instead, will be combined into one estimate for all types of fishing. NSFHWR does not provide the same detail in terms of different expenditure categories as in the NMFS expenditure survey and does not provide the same spatial or temporal resolution regarding the saltwater only expenditures which allow for more detailed expenditure analysis needed by fisheries managers. One benefit of the NMFS trip expenditure survey is that other aspects of the fishing trip are captured including those not captured on the NSFHWR survey. Examples include species targeted and the location the trip left from in terms of a city or town. This level of detail is frequently requested by the regional offices, fishery management council staff, or academic researchers. Further, in 2022, the NSFHWR had to cut state level analyses and data for nearly all states due to budget cuts and USFWS economists have informed NMFS that they intend to only produce nationwide or regional estimates in the future.

A number of academic research projects have collected trip expenditures related to specific fish species in specific areas and are typically one time surveys rather than recurring ones. Frequently, NMFS economists are contacted by graduate students and faculty at the start of these projects. NMFS economists will provide information on the nationwide survey and advice to the researchers looking to conduct similar surveys on a smaller scale. Through these conversations, NMFS learns about new surveys being conducted. No other survey of marine angler expenditures that is consistent across states has been conducted that would duplicate the efforts or data being collected under the current data collection.

1. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The respondents are individuals and households, no small businesses are surveyed.

1. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

As stated in question 2 above, NMFS fisheries managers and the regional fishery management councils use the results of the survey in an annual report on the economics of U.S. fisheries and to understand the economic effects related to proposed or enacted fisheries management decisions or the impacts of adverse natural or economic events (e.g. hurricanes, ocean conditions, and changes in economic factors affecting recreational fishers). If the survey were to be discontinued or delayed, the data and information used in the Fisheries Economics of the US report and in fisheries policy analyses would become progressively outdated and would not accurately describe current conditions or be as useful for predicting possible economic outcomes. Additionally, NMFS would not be able to meet its statutory requirements for providing timely economic analyses.

1. **Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.**
2. Respondents are not required to report information to the agency more often than quarterly. The trip expenditure portion of the survey that is conducted in person at fishing access sites throughout the calendar year may result in an angler being intercepted and asked to participate in the survey more often than quarterly as the data being collected is based on a trip taken and anglers may take multiple trips. The number of anglers surveyed in person are proportional to the number of fishing trips taken in the state, which are generally quite large; therefore the probability that an angler is surveyed more than once is low. Also, as participation in the survey is voluntary, all anglers have the option to decline the survey and/or take it one time only therefore, no respondent is required to report information at all or more than quarterly. For the mail/internet version of the trip survey, NMFS will contact anglers every two months and as the license frame is large, it is unlikely that a given angler will be contacted more than once in a three month period. The angler always has the option not to respond at any time and may choose to do so after returning the survey once. For the durable goods portion it is a one time survey during the year.
3. Respondents are not required to prepare a written response to a collection of information in fewer than 30 days after receipt of it. The mail/internet version of the trip survey and the durable goods survey requests respondents to either write in responses on paper or to enter responses in the online web version within a few days of receiving the survey in either format, and sends reminders within a 1 week to 3 week time frame. The goal is to have all surveys returned no later than 4 weeks after being sent out in order to keep within the limits of the survey schedule and the typical timeframe for the survey contract with the survey research firm. However, because this is a voluntary survey, respondents are not required to prepare a written response to a collection of information in fewer than 30 days after receipt of it.
4. Respondents are not required to submit more than one original response to the survey each time they are contacted (e.g. on a per trip basis, or once for the durable goods portion);
5. Respondents are not required to retain records at all including for more than three years;
6. The statistical survey is designed to produce valid and reliable results that can be generalized to the universe of study;
7. The survey is not requiring the use of a statistical data classification that has not been reviewed and approved by OMB however we have included the short version of the race/ethnicity question due to the space limitations on the survey as well as trying to keep the survey as simple and short as possible to minimize respondent burden time and question complexity;
8. The data collection includes a pledge of confidentiality that is supported by statutory authority, as well as disclosure, and data security policies that are consistent with the pledge. It does not impede sharing with other government agencies.
9. The data collection does not require respondents to submit proprietary trade secret, or other confidential information.
10. **If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register Notice published on Tuesday, July 30, 2024 (89 FR 61097) which solicited public comment. Only 1 comment was received in response to the Federal Register Notice.

That comment stated “There is no necessity for another survey. There is already a 5 year study survey that comes out every 5 years on the spending that is being done by fishermen. There is no need for additional surveys.” This commenter is actually misunderstanding what NMFS is trying to do with the Federal Register announcement, i.e., renew this collection. Therefore, there is no action to be taken in response to that comment.

A workshop focused on the Economics of Recreational Fisheries sponsored by NMFS and targeting representatives from the recreational fishing constituents was held in late April 2023. The expenditure survey was one of many projects discussed in detail during the two day workshop. A total of 56 individuals attended the workshop, and represented a broad geographic diversity covering the jurisdictions of seven of the eight regional fishery management councils, and included individuals representing NMFS, regional fishery management councils, state management agencies, academia, and the private and for-hire recreational fishing communities, among others.[[4]](#footnote-5) In particular, in the breakout sessions during the workshop, at least 5 staff economists and analysts from the Gulf of Mexico Fishery Management Council and South Atlantic Fishery Management Council discussed how they used the expenditure estimates in numerous analyses they conducted. They discussed how the survey was one of the best sources of information they had available that was consistent between years. They felt that the current schedule of every 3 to 5 years was reasonable and that the expenditure categories collected, the modes of fishing that were included (private boat, shore and for-hire), and the geographic detail was helpful for the wide range of analyses they conducted. They stated that having the survey conducted by NMFS was more cost-effective than having individual states conduct their own surveys or having the fisheries councils or commissions conducting them regionally. They also felt strongly that the survey should continue in the future so that analyses between years could be conducted with a consistent data set. As a follow up to the workshop, in June of 2024, a representative from Southwick Associates sent a letter to NMFS leadership on behalf of a number of the external constituents praising the efforts of NMFS regarding economic data collection efforts and encouraging NMFS to continue collecting expenditure data and in particular, to ensure that durable good expenditures continued to be collected. A discussion of the workshop, the expenditure survey, and the followup letter was also held with the NMFS Marine Fisheries Advisory Committee, Recreational Sub-Committee (8 people) in early 2024. The Sub-Committee felt that the expenditure survey was extremely useful, easy to understand, and well received by their constituents.

1. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There will be no payment or gifts to respondents.

1. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

We are not collecting any Personal Identifiable Information (PII) from the respondents. Names and email, phone numbers and mailing addresses collected by other means are only used by NMFS to send out and conduct the survey. When the survey closes, the files containing that information are deleted within 60 days as per NMFS requirements. The dataset sent to NMFS by the survey contractor contains a randomly assigned code for each survey response as an identifier. For the durable goods survey and for the trip expenditure survey for states not included in the APAIS survey, sample frames for each state will be drawn by an outside contractor from the recreational fishing license/registry databases maintained by all the coastal states or from the boating registration frame for Hawaii as previously discussed above. Prior to receiving these license databases, our survey administration contractor will provide a signed access agreement and a confidentiality agreement.

The information in the license database and sample frame is covered under the Privacy Act System of Records COMMERCE/NOAA-11, Contact Information for Members of the Public Requesting and Providing Information Related to NOAA’s Mission. To support the anonymity of this research, no participant names will be included on the survey document. Participant names will be tracked in a separate database to code participants for protection during data analysis, confirm receipt of a survey from each individual, and avoid duplication of responses. The web/mail version of trip expenditure and durable expenditure survey will contain written text informing participants of the confidential and voluntary nature of their response. The intercept version of the trip expenditure survey will include instructions to the interviewer to inform participants of the confidential and voluntary nature of the response and no names or other PII data is collected during the interview. Prior to providing deliverables, the contractor will delete all personal information such as name, street address, email address, and phone number; therefore, NMFS will not be able to link the survey information to any individual.

When writing final reports and publishing the findings of this research, tabulations of individual responses will occur at a high enough level of aggregation so that no single individual may be identified. In addition to the confidentiality protection measures, survey participants are provided the option to skip questions of concern and stop their participation in the survey at any time with no consequence to themselves. Finally, in the event of a Freedom of Information Act (FOIA) request, we will protect confidentiality to the extent possible under Exemption 4 of the FOIA.

1. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The survey does not include any questions of a sensitive nature.

1. **Provide estimates of the hour burden of the collection of information.**

Part B of this supporting statement provides estimates of the sample size and response rate for each of the individual elements of this survey. The corresponding annual estimates are 28,106 responses, 3,160 burden hours and a wage burden of $99,490.12. Table 1 provides the estimates for each of the individual elements of this survey. The information used to estimate the minutes per response include information on average response times from prior surveys, feedback from NOAA staff who pretested the individual parts of the survey, information from anglers who called or emailed to discuss the survey, and/or information from focus groups held in prior years. We used an hourly rate of $31.48 (Occupational Code: 00-0000). That is the average for all civilian workers across the United States from the May 2023 wage estimate tables from BLS

(<https://www.bls.gov/oes/current/oes_nat.htm>). There are no other costs for maintaining records or preparing other documents.

**Table 1: Annual burden estimates for all parts of the trip and durable goods survey**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection** | **Type of Respondent (e.g., Occupational Title)** | **# of Respondents/year(a)** | **Annual # of Responses / Respondent(b)** |  **Total # of Annual Responses(c) = (a) x (b)** | **Minutes / Response(d)** | **Total Annual Burden Hrs(e) = (c) x (d)** | **Hourly Wage Rate (f)** | **Total Annual Wage Burden Costs(g) = (e) x (f)** |
|  Trip Expenditures Intercept | Recreational anglers (all occupations) | 21,545 | 1 | 21,545 | 5 mins | 1,795 | $31.48  | $56,506.60 |
| **Trip Expenditures (Web/Mail)** |  |  |  |  |  |  |  |  |
| Web  |  Recreational anglers (all occupations) | 1,434 | 1 | 1,434 | 7.4 min. | 177 | $31.48  | $5,571.96 |
| Mail  |  Recreational anglers (all occupations) | 234 | 1 | 234 | 8 mins | 31 | $31.48  | $975.88 |
| **Combined** |  | **1,668** | **1** | **1,668** | **15.4 mins** | **208** |  | **$6,547.84** |
|  Durable Goods Expenditures (state and HMS) |   Recreational anglers (all occupations) | 4,263 | 1  | 4,263 | 15 mins | 1,066 | $31.48  | $33,557.68  |
| Hawaii Trip and Durable Good Survey (web/mail) |  Recreational anglers (all occupations) | 185 | 1 | 185 | 15 mins  | 46 | $31.48  | $1,448.08 |
| Hawaii Charter Trip Expenditures | Recreational anglers (all occupations) | 90 | 1 | 90 | 5 mins | 8 | $31.48  | $251.84 |
| HMS Trip Expenditures |  Recreational anglers (all occupations) | 355 | 1 | 355 | 6.3 mins | 37 | $31.48  | $1,178.08  |
| **Totals** |  |  |  | **28,106** |  | **3,160** |  | **$99,490.12** |

1. **Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection. There are no requirements to keep any records.

1. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

Based on the average actual costs related to contract support of conducting the 2106/2017 and 2022 surveys and the 2019 durable goods survey, the estimated cost is $185,733 annually for conducting angler intercept interviews, developing and cleaning the sample frames, developing online survey questionnaires and mail questionnaires, sending angler contacts such as emails or letters, for printing and mailing, and data entry. The costs include an additional contractor for 5 months of time to analyze the survey data and assist with preparation of a report detailing methodology and results. All analysis of the data and reporting, and any scientific publications will be developed by the NMFS staff as part of their regular federal duties. The survey administration contractor is estimated to cost $185,733 ($557,200÷3 years) annually, and the contractor hired to conduct the modeling will cost $17,395 ($52,185/year ÷3) annually. Overall, the annual federal government cost is $255,391.

**Table 2: Estimated Annual Costs to the Federal Government**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Cost Descriptions** | **Grade/Step** | **Loaded Salary /Cost** | **% of Effort** | **Fringe (if Applicable)** | **Total Cost to Government** |
| **Federal Oversight** |  ZP4/3 |  $261,313/yr |  20 |   | $ 52,263 |
| Other Federal Positions |   |   |   |   |   |
|   |   |   |   |   |   |
|   |   |   |   |   |   |
| **Contractor Cost** |   |   |   |   |   |
|  Trip Expenditure |   |   |   |   | $120,400 |
|   Durable Goods Expenditure |   |   |   |   |  $65,333 |
| Survey data analysis  |  |  |  |  | $17,395 |
| **Travel** |   |   |   |   |   |
| **Other Costs:**  |   |   |   |   |   |
| **TOTAL** |   |   |   |   |  $255,391 |

1. **Explain the reasons for any program changes or adjustments reported in ROCIS.**

There were minor adjustments in burden hours because of updated estimates of the number of respondents. There were minor updates to the average estimated time to complete the survey based on the most recent survey results. The previous revision was for 3,215 burden hours, this revision is for 3,160 burden hours, a decrease of 55 burden hours.

**Table 3:** **Changes and Adjustments to each IC**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Information Collection** | **Respondents** | **Responses** | **Burden Hours** | **Reason for change or adjustment** |
| Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision | Current Renewal / Revision | Previous Renewal / Revision |  |
|   Trip Expenditures Intercept |  21,545 |  21,895 |  21,545 | 21,895  |  1,795 |  1,824 |   |
| Trip Expenditures (Web/Mail) | 1,668 | 1,668 | 1,668 | 1,668 | 208 | 222 |  |
|  Durable Goods Expenditures (state and HMS) | 4,263 | 4,263 | 4,263 | 4,263 | 1,066 | 1,066 | No Change |
| Hawaii Trip and Durable Good Survey (web/mail) |  185 | 185  | 185 | 185 | 46 | 46 | No Change |
| Hawaii Charter Trip Expenditures |  90 | 93  | 90  |  93 |  8 | 8 |   |
| HMS Trip Expenditures | 355 | 370 | 355 | 370 | 37 | 49 |  |
| **Total for Collection** | **28,106** | **28,474** | **28,106** | **28,474** | **3,160** | **3,215** |  |
| **Difference** |  -368 | -368  |  -55 |   |

1. **For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Publication Outlets

The results and analysis of the data will be published in NOAA Technical Memorandums on the survey methods and results and in the annual report “Fisheries Economics of the United States.” Both will be available internally and externally to any interested person via the NOAA website.

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

There is typically one report each for each of the following: the trip expenditure data, the durable expenditure data focused on the general angler sample, and the HMS angler sample. These reports are similar in nature and detail the survey methods, sampling strategies, and other procedures used to conduct the survey. The general angler data reports provide tables for each state and for the US as a whole. There are tables for mean angler expenditures by expenditure category and total angler expenditures. The HMS reports are similar but tend to provide regional level results rather than state level results. The latest reports are as follows (note that the report for the 2022 trip expenditure survey is in review):

* Lovell, Sabrina, James Hilger, Emily Rollins, Noelle A. Olsen, and Scott Steinback. 2020. The Economic Contribution of Marine Angler Expenditures on Fishing Trips in the United States, 2017. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/SPO-201, 80 p.
* Sabrina J. Lovell, James Hilger, Scott Steinback, and Clifford Hutt. 2016. The Economic Contribution of Marine Angler Expenditures on Durable Goods in the United States, 2014. U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-F/SPO-165, 72 p.

Timeline

Data collection for the trip expenditures typically runs a full calendar year with states that have year round fishing starting in January for the intercept based sample and concluding in December. Surveys for states that have a mail/web sample start in March or April and typically conclude in January to capture fishing from January through December with modifications for states where fishing starts up in March/April/May and that concludes in Sept/October (such as Alaska). Typically there is 4 months of preparatory work which includes obtaining a contractor to conduct the survey, and outreach to anglers and state agencies. Data collection for the durable goods expenditures runs approximately 5 months, including time to prepare the materials with the contractor, conducting the survey, and finalizing results. In prior years, the data analysis and estimation took 3 months, and 2 months for writing the results. Internal review of the publication took 4 to 6 months. Generally, reports are published approximately 12 to 15 months after the survey concludes.

Estimation Methods

Survey data for different categories of trip expenditures are used to estimate mean trip expenditures per angler-day by state and for each of the three modes of fishing (for-hire, private boat, and shore). Mean trip expenditures are estimated by accounting for both the survey design of the underlying sample and the appropriate sample weights. For the intercept-based sample, the sample weights are based on MRIP sample weights adjusted for anglers over 16 years of age and for non-response to the economic add-on survey. The MRIP sample weights are designed so that each intercept in a particular stratum is weighted based on the estimated total effort in that stratum. Therefore, the sum over the sample weights will equal total effort. For the license frame samples, sample weights are calculated based on the sampling strata (e.g. state and license type) and sampling design for each license frame state. These base survey weights, either from the intercept or license frame samples, are further adjusted in the process of estimating mean trip expenditures in order to account for item non-response to the full set of trip expenditure questions. Estimates of the mean and standard deviations for all expenditures categories are generated using standard statistical software, such as the *Proc Survey means* procedure in SAS which incorporates survey weights. To calculate total expenditures by state and mode, the number of trips in each state/mode is multiplied by the corresponding total average expenditure per angler-day. Estimates of the number of trips by state/mode are obtained from the MRIP program in cooperation with state fishery agencies.

Mean durable expenditures are estimated by state and resident status for each durable expenditure category on the survey. Anglers are asked to estimate the percent of time that they use the items for marine fishing and the percentage spent in the survey state. The percentages are then multiplied by the expenditure amount in order to get the amount attributed to marine fishing spent in the survey state. Only durable goods used primarily for marine fishing (50% or over) are included. For any items that anglers report using less than 50% of the time for marine fishing, expenditures are recorded as zero. In order to correctly capture zero expenditures, the questionnaire instructs respondents to write zero if they spend nothing for an item. Additionally, screening questions are added to the survey for every grouping of expenditure categories. Respondents are asked if purchases of boats, boat accessories, vehicles, and second homes were made new or used, from dealers or private parties, or were financed. These secondary questions are used to estimate fees for things like real estate commissions and finance charges. Weighted mean estimates for all expenditures categories are generated using the *Proc Surveymeans* procedure in SAS. Total annual durable expenditures were estimated by multiplying mean durable expenditures in each category by the estimated annual number of participants. Estimates of the number of anglers are obtained from the MRIP program in cooperation with state fishery agencies.

Mean and total expenditures for the sample drawn from the Atlantic Highly Migratory Species Permit database are estimated separately from the state totals and not included in the total U.S. or state level trip or durable goods estimates. This likely underestimates the totals in those states, but this is done to avoid any potential double-counting. In the durable goods part of the survey, respondents are also asked how many days they had spent saltwater fishing in the previous 12 months and how many of those days were spent fishing for HMS. These numbers are used to estimate what percentage of each angler’s fishing effort is spent targeting HMS. This ratio is then used to calculate separate estimates of durable good expenditures that could be minimally credited to HMS fishing. Total HMS durable good expenditures are estimated by extrapolating the estimated mean HMS related expenditures by the number of Atlantic HMS Angling permit holders.

1. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The agency plans to display the OMB Control No. 0648-0693 and the expiration date for OMB approval of the information collection on all survey instruments, as well as on correspondence if appropriate.

1. **Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions."**

The agency certifies compliance with [5 CFR 1320.9](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-9.pdf) and the related provisions of [5 CFR](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf) [1320.8(b)(3)](http://www.gpo.gov/fdsys/pkg/CFR-2014-title5-vol3/pdf/CFR-2014-title5-vol3-sec1320-8.pdf).

1. States include Alabama, Alaska, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Louisiana, Maine, Maryland, Massachusetts, Mississippi, New Hampshire, New Jersey, New York, North Carolina, Oregon, Rhode Island, South Carolina, Texas, Virginia, and Washington. [↑](#footnote-ref-2)
2. https://www.fisheries.noaa.gov/national/socioeconomics/marine-angler-surveys. [↑](#footnote-ref-3)
3. https://www.fisheries.noaa.gov/national/sustainable-fisheries/fisheries-economics-united-states [↑](#footnote-ref-4)
4. Lovell, S., W.M. Goldsmith, D. Lipton, R. Dunn, J. Hadley, R. Southwick, and J. Whitehead. 2023 NOAA Fisheries Recreational Fisheries Economic Constituent Workshop Report. 2023. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-244, 33 p. https://spo.nmfs.noaa.gov/content/tech-memo/2023-noaa-fisheries-recreational-fisheries-economic-constituent-workshop-report [↑](#footnote-ref-5)