SUPPORTING STATEMENT
ECONOMIC PERFORMANCE IN THE COMMERCIAL STONE CRAB AND LOBSTER FISHERIES IN FLORIDA
OMB CONTROL NO.: 0648-xxxx

A. JUSTIFICATION

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

The objective of the proposed work is to collect data with which to establish socio-economic baselines in the commercial stone crab and lobster fisheries assess the financial and economic performance of the industry, and develop economic models to evaluate future management proposals. This project builds upon a previous data collection (OMB Control No.: 0648-0534, expiration date 01/31/2009) by National Oceanic and Atmospheric Administration (NOAA)'s National Ocean Service and Thomas J. Murray & Associates to monitor fishing activities, including the commercial stone crab and lobster fisheries, within the Florida Keys National Marine Sanctuary. An abbreviated and modified form of the previous survey instrument will be used to collect data from stone crab fishermen that land in counties along the west coast of Florida and from lobster/stone crab fishermen that land in the Miami River area. Data will not be collected in the Florida Keys, which was surveyed in the previous study. The University of Miami, which is our contractor, will train interviewers, conduct in-person interviews, accurately enter data into a database, and provide the completed survey forms to the Southeast Fisheries Science Center (SEFSC). The SEFSC anticipates the need for approximately 150-175 voluntary, in-person interviews from approximately 770 commercial stone crab and lobster fishermen who live in areas outside of the previous study area. The data collection will occur between May and October 2007 when the stone crab fishery is closed.

The need for social and economic information and the authorization to collect these data are found in the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 *et seq.*), as amended in 2007, Executive Order 12866 (58 FR 51735 [1993]), the Regulatory Flexibility Act (5 U.S.C. 601 *et seq.*), the National Environmental Policy Act (42 U.S.C. 4371 *et seq.*), and Executive Order 12898 (59 FR 7629 [1994]). The Magnuson-Stevens Act requires that fishery management plans include a Fishery Impact Statement to describe and assess the likely effects of the conservation and management measures on participants in the fisheries being managed, fishing communities dependent on these fisheries, and participants in fisheries in adjacent areas. Executive Order 12866 requires economic analyses of the benefits and costs to society of each proposed regulatory alternative, and a determination of whether the rule is significant. Under the RFA, the Small Business Administration needs to determine whether a proposed rule has a significant impact on a substantial number of small entities that are to be directly regulated, including an assessment of the change in short-term accounting profits for small entities. Under the National Environmental Policy Act, analyses must be conducted to determine whether federal actions significantly affect the human environment, which requires a number of different types of economic analyses. Executive Order 12898 requires federal agencies to address environmental justice concerns by identifying "disproportionately high and adverse human health and environmental effects...on minority populations and low-income populations."

2. <u>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</u>.

By whom and how frequently data will be used:

Upon completion of the survey, information to be acquired with this data collection will be used by economists employed by the SEFSC to prepare an assessment of economic performance in the commercial stone crab and lobster fisheries. Thereafter, data will be used periodically by economists with the SEFSC and Gulf of Mexico Fishery Management Council to estimate the likely economic effects of proposed regulations, with the frequency of use to be determined by the frequency with which new regulations are proposed. Analyses based on these data will be made available to fishery managers and the public in support of the fishery management process.

How and for what purpose the data will be used:

The proposed questionnaire is attached. Page 1 is to be completed by the interviewer and documents the process of contacting randomly selected fishermen and scheduling an interview. Information on page 1 will not be entered into the final database that is provided to the SEFSC. Page 2 includes the statement of public reporting burden. Pages 3-9 include the questions to be asked of each respondent.

General Information

The respondent's The Saltwater Products License (SPL) number will be recorded. The SPL number is the key identifying variable in the Florida trip ticket database. The State of Florida requires fishermen to file trip reports with information about landings by species. We plan to summarize information about catches as reported in the trip ticket database rather than lengthen each interview by asking fishermen about their landings in the stone crab, lobster and other fisheries. In addition, the SPL number is unique for each fisherman, and represents the variable used to create the sampling universe of stone crab fishermen. See Part B, responses #1 and #2 for a description of the sampling universe and sampling procedures based on SPL number.

Questions 1-4 ask for basic demographic information, such as age and ethnicity of the respondent and the number of persons in the household. Ethnicity date will be used to categorize the results of analysis of proposed regulations in order to address environmental justice concerns.

Question 5 asks if the respondent belongs to a fish house. Many fishermen are directly employed by fish houses and others simply sell their catch to a fish house without a formal agreement requiring them to land the fish with the fish house. This item provides information about the extent of contractual arrangements within the fishery, which may affect geographic mobility in response to regulation.

Question 6 asks for the fisherman's primary hauling port/dock. This information provides the connection between fishing activities and the communities that benefit from these activities.

Question 7 asks for the fisherman's years of experience in the commercial fishing industry. Years of experience in commercial fishing is a measure of personal investment in fishing as a career choice, and a potentially important measure of skill in a production function. Also, this information is an important indicator of the respondent's willingness to adapt to changes in economic and/or regulatory conditions in their fishery, with the hypothesis that fishermen with longer tenures and greater personal investment in fishing would be more willing and able to adapt to changing conditions in the fishery.

Questions 8-10 pertain to the issue of economic dependency on commercial fishing. Fishery regulations are likely to have the greatest adverse consequences to fishermen for whom commercial fishing is a major source of personal and household income. Question 8 asks the respondent to assess his or her level of involvement in commercial fishing as an occupation. The key distinction is whether he/she is part time or full time in the commercial fishery. Separate responses appear for charter boat operators who do not consider themselves to be commercial fishermen but still sell some of their catch. Similarly, some fishermen that are normally considered recreational fishermen may on occasion sell their catches. Questions 9 and 10 ask about the relative importance of commercial fishing as a source of personal and household income. Fishermen with other sources of income (such as other jobs, pensions, investments and working spouses) are better able to absorb reductions in fishery income due to regulation, at least temporarily, while alternative fisheries or employments are being sought.

Vessel and Gear Information

Questions 11-13 ask about vessel length and age and horsepower of its engines, which are fixed factors in each fisherman's production function and serve as explanatory variables for industry-wide studies of production and cost.

Question 14 asks about numbers of total traps fished, whereas Question 20b asks about traps fished per trip. It is expected that total traps fished will exceed traps fished per trip because competition among fishermen often compels them to fish as much bottom space as possible by deploying large numbers of traps, each with long soak times because it is infeasible to check (i.e., pull) each trap on a single trip. Questions 14-16 ask about fish traps in addition to stone crab and lobster traps because some stone crab fishermen along the west coast of Florida use fish traps to land groupers during the May-October closed season for stone crab.

Data about revenues, costs and profits are used to monitor the health of a fishery and study the effects of proposed regulations. Estimates of landings and revenues can be obtained from trip reports submitted to the State of Florida trip ticket database. However, data about costs are not available elsewhere. Relevant costs include marginal costs per trip, marginal costs per trap, and fixed costs per boat for the overall fishing operation. Questions 16 and 17 pertain to the marginal cost per trap. Questions 18 and 19 pertain to fixed costs per boat. Question 20 pertains to marginal costs per trip.

Question 15 asks about the expected lifetime of stone crab, lobster traps and fish traps so that the cost of new traps can be depreciated when estimating the marginal cost of owning an additional trap. Depreciation for traps will be determined from the cost of a new trap (Question 16) and the expected lifetime of stone crab and lobster traps (Question 14).

Question 16 asks about the cost of adding or replacing traps and the number of new or replacement traps built or bought. Hence, Question 16 determines current outlays for new traps and establishes the cost of a new trap to be used in the calculation of depreciation.

Question 17 asks about maintenance and repair costs, which vary directly with the amount of gear used in the fishery. Hence, they are an important component of the marginal cost of owning and operating each unit of gear fished. Separate estimates of maintenance and repair will be requested for each gear type to enable studies about the costs and benefits of changes in the number of gear used for each fishing activity as a result of switching behavior among fishing activities as fishermen respond to regulation.

Capital Investment in Boat and Gear

Question 18 asks for the fair market value of the vessel, gear and trap certificates. Market value is used to determine the opportunity cost of capital invested in the fishery, which is used to determine if economic rents are earned in the overall fishing operation. The market value of traps and trap certificates is used to estimate the opportunity cost of traps as one component of the marginal cost per trap. The stone crab and lobster fisheries are managed by the State of Florida with trap certificate programs. Trap certificates are transferable privileges to deploy traps, with the total number of traps in the fisheries limited by the State. Therefore, trap certificates have market value as fishermen must buy additional certificates to expand their scales of operation in the fishery, and may sell certificates to contract their scales of operation.

Question 19 asks for cash expenses associated with ownership of the respondent's boat during 2006, such as dock space, insurance, loan payments, and office and vehicle expenses. We expect that Question 19 will be the most difficult for fishermen to recall accurately, and interviewers will prompt respondents to check their income tax records if they seem unable to answer the question with certainty.

Fishing Activity During 2006

Question 20 represents the heart of the survey because trip-level data will be used to estimate the expected economic effects of regulation on the profitability of different kinds of trips, and the possibility that fishermen will either continue to fish as before or change their fishing strategies in response to proposed regulation. Therefore, this question asks for detailed information about fishing effort and harvesting costs in the stone crab and lobster fisheries and the respondent's most important other fishing activity. Responses will be recorded in the table on the page following Question 20, with Column A pertaining to stone crab trips, Column B pertaining to lobster trips, and Column C pertaining to the respondent's most important other fishing activity. Participation in both stone crab and lobster fisheries is common in the Florida Keys, but not along the west coast of Florida or in the Miami River area where this survey will be conducted. Therefore, we anticipate that the majority of respondents will complete Column A or B and Column C in the table associated with this question.

Question 20a asks respondents to identify the three most important species landed in each type of trip. Stone crab and lobster trips primarily harvest one species—either stone crabs or lobsters. However, other gears are less selective, and we expect responses for the other fishing activity in

Column C to vary considerably among respondents. Respondents along the west coast of Florida probably participate in the stone crab, grouper and/or mackerel fisheries, while respondents in the Miami River area probably participate in the lobster, mackerel and/or yellowtail snapper fisheries. Information from Question 20 will be combined with information about fishing effort and landings from the Florida Trip Ticket database, but we need to match the kind of fishing trip described in Column C with the same kind of trips from the Trip Ticket database. The purpose of asking for the top three species (Question 20a) and gear type (Question 20b) is to assist in the process of classifying trips from the trip ticket database and then matching with our survey data.

Questions 20b and 20c ask for various measures of fishing effort, including the type and amount of gear used, average crew size, the average duration of trips in terms of days absent from port. Fishing effort is an important determinant of production and cost per trip, both of which can change as a result of regulation.

Question 20d asks for expected trip costs. Trip costs for fuel, oil, ice, bait, food, and the frequent loss of tackle vary predictably per trip, and separate estimates are requested for each type of fishing. Payment to crew members represents one of the largest cost components. Fishing is a highly uncertain business, and typically, payments to the crew, captain and boat owner are calculated as a percentage of revenues after deducting trip costs so that all share in the risk and reward of variable catch rates. This question asks for cash outlays to crew members, including captain if he/she is not the owner. Payments to owner-operators are usually deposited in their business accounts from which they earn a salary. In addition, they devote considerable non-fishing time to their businesses. Hence, it would be difficult for owner-operators to impute and report an accurate labor cost per trip for themselves.

Question 20e asks for expected revenues per trip. In theory, fishermen base their decisions about whether to take another trip on the difference between average revenues and average costs per trip, or whether to switch to an alternative type of fishing trip by comparing net revenues per trip among fishing activities. Also, the sum of trip revenues minus trip costs must be sufficient during the year to pay the owner for his labor, fixed costs and opportunity cost of capital invested in the business.

Many stone crab fishermen along the west coast of Florida use fish traps to catch groupers between May and October when the stone crab season is closed. However, fish traps will be prohibited in federal waters beginning in February 2007. The proposed survey will interview fishermen during the first year in which they will have had to adapt to this regulation. The purpose of Question 21 is to obtain information about likely losses to fishermen from the upcoming prohibition on the use of fish traps in the Gulf. Column D in the table will ask fishermen about their 2006 activities with fish traps, while column E will be used to find out how they adjusted and how it affected their harvesting costs and revenues per trip.

Performance under the Certificate Program

Questions in Part 2 of the proposed questionnaire concern the views held by stone crab fishermen on the 2000 Stone Crab Trap Certificate Program (Florida Statutes 370.13). Under the program, fishermen have been allocated a fixed number of certificates, each of which corresponds to a stone crab trap that can be used to fish each stone crab season. Unlike the other trap certificate program which concerns the spiny lobster fishery (Florida Statutes 370.142) and

which has included an active reduction, the stone crab certificate program has allowed for more gradual, passive reductions. Thus, this section provides for an excellent opportunity by which to contrast the perceived efficacy and equity of the present system, especially as compared to the aforementioned spiny lobster certificate program.

Questions 1 though 4 concern the allocation (i.e. number of trap certificates provided to the fisherman as part of the stone crab certificate program). Question 1 asks the number of traps generally fished prior to the certificate program, and Question 2 asks how many traps were allocated. The difference, if any, will assist in establishing a potential basis for the fisherman's subsequent views on the program, as these may be related to perceived gains or losses at the allocation stage. Accordingly, Question 3 asks if the amount of certificates awarded were fair or not, and Question 4 follows up with asking about changes in effort since the allocation.

Questions 5-10 are open-ended because we do not know the entire range of responses that may be given. Some possible outcomes can be envisioned, but we do not want to influence the respondents by telegraphing categories of responses or coaxing particular responses by having them pre-coded on the questionnaire. The open-ended nature of each question will be treated as a discovery technique intended to result in a better understanding of fishers' operational strategies and views towards management.

Question 5 addresses the present level of effort, in terms of the number of traps fished currently, to determine why the fisherman has elected to fish the trap total that he/she does currently.

Question 6 concerns the changes in catch-per-unit-effort (CPUE), as measured by the amount landed per trap, since the inception of the certificate program. The information gathered from this question is important in understanding both how the program is perceived and (on a firm level) how the program has performed (notwithstanding other resource condition changes).

Question 7 asks whether the fisherman's fishing areas have changed since the certificate program began and if so, then why. One of the expected results of the program over time is that CPUE will increase and that fishing areas may contract (if not in distance from port, then in total area). However, a mitigating factor in the past three years has been the increase in fuel prices, and thus the question is asked using an open-ended format, thereby allowing the respondent to expatiate on sundry conditions that may have affected fishing areas. Respondents will be encouraged to point out fishing areas on maps of Florida waters.

Question 8 addresses the changes in fishery participation at the fishermen's dock since the inception of the program. Participation in the spiny lobster fishery declined considerably since the implementation of the spiny lobster trap certificate program[1], and this question examines whether such changes have occurred under the stone crab trap certificate program.

Questions 9 through 11 consider the overall effects of the stone crab trap certificate program, as

[1] Larkin, S., and J. W. Milon. 2000. Tradable Effort Permits: A Case Study of the Florida Spiny Lobster Trap Certificate Program. International Institute of Fisheries Economics and Trade Conference, Corvallis, OR, July 10-14, 2000. World Wide Web Document. URL: http://oregonstate.edu/dept/IIFET/2000/papers/larkin.pdf; Shivlani, M. P., and J. W. Milon. 2000. Socio-cultural Effects of a Market-based Fishery Management Program in the Florida Keys. *Coastal Management* 28: 133-147.

these relate to the overall performance of the program and how that may compare to the spiny lobster trap certificate program, and especially whether the industry would favor an active reduction component in the program if it were to result in other fishery benefits. Under the present framework, effort in the stone crab fishery is not expected to decrease for several years[2], and Questions 10 and 11 explore fishermen's views on the acceptability of such a program, compared to a more active reduction model (under different benefit scenarios). The information gathered will provide an important benchmark that can be used to compare active and passive reduction programs, both in terms of their acceptability and overall performance.

How the data collection complies with all applicable Information Quality Guidelines:

Data and analyses based on this data collection will comply with agency guidelines to assure the utility, objectivity and integrity of information. As explained in the preceding paragraphs, the information gathered has utility. NOAA's National Marine Fisheries Service (NMFS), and in particular the SEFSC, 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 Part A, response #10 of this Supporting Statement for more information regarding confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. Should NOAA Fisheries SEFSC decide to disseminate the information, it will be subject to the qualify control measures and pre-dissemination review pursuant to Section 515 of the Public Law 106-554.

3. <u>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</u>.

Trained interviewers will collect data during face-to-face personal interviews with commercial stone crab and lobster fishermen. Personal interview is the preferred method of collecting this information as a means to establish better rapport and interaction with respondents. Interviewers are better able to explain the intent of each question and understand the context of the answer, especially for open-ended questions about performance under the new trap certificate program for the stone crab fishery. Questionnaires will be filled out the old-fashioned way with pencil or pen, and data will be scanned into a database at a later date. Interviewers will not use laptops or other computers to electronically record responses during each interview. Although electronic recording of information during the interview would hasten the analyst's access to the database, it is our belief that it would lengthen the duration of each interview and would eliminate any paper record that could be consulted when suspicious or unusual observations are encountered during an analysis.

The questionnaire will be available for public printing off the internet (site to be determined), and individuals who have been randomly selected for the survey may fill in the form and send it to us electronically. However, information that may be submitted by members of the public who have not been randomly selected for the survey will not be used. We do not plan to expend

[2] Sharp, W. 2006. Stone Crab Stock Assessment Consent Agenda, October 20, 2006. Florida Fish and Wildlife Conservation Commission, Division of Marine Fisheries Management. World Wide Web Document, URL: http://www.floridaconservation.org/commission/2006/Dec/Presentations/stonecrab_SA_Dec06_%20Final.pdf.

research funds to establish a website through which respondents can submit data directly into a database since this is a small, one-time survey.

Data to be collected during the survey will not be made available to the public over the internet. Reports based on the survey will be available upon request.

4. Describe efforts to identify duplication.

The proposed data collection benefits in two ways from other reporting requirements or surveys. First, the State of Florida trip ticket program already collects trip-level information about landings by species. Therefore, the proposed questionnaire is shorter and less time-consuming to complete because it does not need to ask for information about catches.

Second, a previous survey (OMB Control No.: 0648-0534) already collected social and economic data from stone crab and lobster fishermen in the Florida Keys, and hence the proposed data collection will save research time and money by not including the Keys in the sampling universe. The proposed questionnaire is constructed to be as compatible as possible with that of the earlier survey so that data from the two surveys can be combined for analyses of the entire geographic range of the stone crab fishery. The combined data will account for the bulk of the lobster fishery, but the proposed data collection is not funded sufficiently to survey the lobster fishery along the east coast of Florida (see Part A, response #8 for additional discussion).

The proposed questionnaire is shorter than that used previously in the Florida Keys because there is no need to ask about fishermen's perceptions of the Florida Keys National Marine Sanctuary or for detailed information about trip-level landings, fishing effort and harvesting costs in fishing areas near the Sanctuary.

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

Commercial stone crab and lobster fishermen operate small businesses as defined by the Small Business Administration. The proposed data collection minimizes reporting burden by requesting that a sample of boats provide social and economic information. Boats not selected in the sample will not incur a reporting burden.

In addition, the survey is designed to collect information efficiently through face-to-face interviews with fishermen. Experienced interviewers will ask questions and record answers. There are no written forms or paperwork to be completed and submitted by fishermen. Interviews will be conducted at times and locations convenient for fishermen and all questions require short answers, except for the open-ended questions about performance under the trap certificate program for the stone crab fishery. Interviews are planned for the summer of 2007 to coincide with the annual closed season in the stone crab fishery, and after the normal April 15th deadline for the 2006 tax year so that fishermen (or their accountants) should have recently completed their annual compilations of costs. The questions about maintenance / repair and overhead costs are projected to be the most difficult to answer and may require fishermen to refer to their tax records. Furthermore, the reporting burden on respondents is minimized in that they

will not be asked to provide information on a continuing basis.

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

Economists in the SEFSC are charged with collecting economic data from fishermen in all commercial fisheries in the southeast for which federal fishery management plans exist. Data from the proposed data collection, when combined with data from the previous survey in the Florida Keys, will establish socio-economic baselines in the commercial stone crab and lobster fisheries with which to assess the current financial and economic performance of the industry, and will enable the development of economic models with which to evaluate future management proposals. If the proposed data collection is not conducted, then analyses of proposed management actions would be based on data from the previous survey of fishermen in the Florida Keys. While these data are adequate for the Keys, they will be subject to question when applied to fishermen who live in counties along the west coast of Florida where fishing conditions and opportunities are expected to be substantially different. Regulation based on incomplete data could be challenged.

The stone crab and lobster fisheries exist primarily in State waters and are managed primarily by the State of Florida. Federal fishery management plans exist and are amended infrequently. Therefore, we plan to collect data in these fisheries about once every 5-10 years, and update data from the baseline survey (i.e., the proposed data collection) with appropriate price indices published by the Bureau of Labor Statistics during the interim. If the proposed data collection were repeated less frequently, then analyses would continue to be based on data from the baseline survey as updated by appropriate price indices. The adequacy of the baseline data for regulatory analyses would depend on the degree to which economic conditions and harvesting costs in the fishery change over time and the frequency with which management plans are amended. Rapid changes in either type of condition would increase the risk of regulatory challenges if the data collection were repeated less frequently.

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

The data collection will be consistent with Office of Management and Budget (OMB) guidelines.

8. Provide a copy of 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.

Public comments about the PRA notice:

A notice was published in the Federal Register on September 26, 2006 (71 FR 56106). We received one comment (in italics below) on October 3, 2006, via e-mail from Captain Ron

Rincones, who noted that surveys of the commercial lobster fishery should include counties along the east-central coast of Florida.

Subject: Lobster Survey

Hello, While the Keys are the primary commercial lobster harvest area. There are also many commercial lobster divers as well, in East Central Florida.

I mention this only because a recent survey from another agency regarding jewfish (goliath), neglected the East Central Florida area where they are quite numerous.

Regards,

Capt Ron Rincones

Our preliminary assessment of the potential respondent universe (see Part B, response #1) indicates that in 2004, 231 persons landed 441,300 pounds of lobsters in counties along the east coast of Florida and 847 persons landed 4,543,500 pounds of lobsters along the west coast of Florida, primarily in the Florida Keys. Data for 2005 were incomplete when obtained, but indicate that 195 persons landed 300,200 pounds of lobsters along the east coast of Florida and 740 persons landed 3,023,300 pounds along the west coast of Florida.

The proposed data collection will sample lobster fishermen in Miami-Dade County along the east coast of Florida, which included 98 fishermen who landed 328,700 pounds of lobsters in 2004 and 79 fishermen who landed 197,200 pounds of lobsters in 2005. Therefore, our data collection will miss fishermen who landed lobsters in east coast counties north of Miami, which is Captain Rincones's complaint. We agree that it would be desirable to include the entire east coast of Florida in our survey, but our budget was insufficient. Based on trip ticket data for 2004, our survey will miss 133 fishermen who landed 112,600 pounds of lobsters. Based on preliminary and incomplete data for 2005, our survey will miss 116 persons who landed 103,000 pounds. Also, the proposed survey will miss 56 fishermen who landed 7900 pounds of stone crabs from Broward through Nassau counties based on data for 2004, and 54 fishermen who landed 6900 pounds of stone crabs based on data for 2005.

Consultations with persons outside the agency:

A previous data collection (OMB Control No.: 0648-0534) by NOAA's National Ocean Service and Thomas J. Murray & Associates interviewed fishermen in the Florida Keys, which encompasses the bulk of the lobster fishery and a large portion of the stone crab fishery. Manoj Shivlani led the interviewing effort for Thomas J. Murray & Associates and will lead the interview team for the proposed data collection. The proposed questionnaire is an abbreviated and modified form of the previous questionnaire, which was successful according to Mr. Shivlani. He has consulted with us during the development of the proposed questionnaire and sampling design.

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.

The proposed survey will request information about trip-level costs and revenues and annual costs for commercial fishermen in the stone crab and lobster fisheries. Each record of the resulting database will include the respondent's SPL number so that data can be merged with information about the respondent's landings that is maintained by the State of Florida. Therefore, this information will be treated as confidential in accordance with NOAA Administrative Order 216-100, Confidential Fisheries Statistics. In addition, the Magnuson-Stevens Act protects the confidentiality of those who submit data for use in the fishery management process.

The integrity of the information will be protected by NOAA standards for security, confidentiality and privacy. It is Agency policy not to release confidential data, other than in aggregate form, as the Magnuson-Stevens Act protects the confidentiality of those submitting data. Data will not be available on-line and will not be distributed except by special request by analysts who need the data to support fishery regulations and have appropriate permissions for access to confidential data. Reports based on these data will not use people's names or other identifying information. Only group averages or group totals will be presented in any reports, publications, or oral presentations of the study's results.

The following assurance of confidentiality will be read to respondents prior to each interview.

> "Thank you for agreeing to participate in our survey. These data will be used to write reports about the economics of commercial fishing activities in Florida's stone crab fishery. All of your information will be confidential. We will not use people's names in our reports, or write anything that could be used to identify you.
>
> Public reporting burden for this collection of information is estimated to average one hour per response including the time for reviewing the instructions, searching the existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspects of this burden to Bob Walker, National Marine Fisheries Service, 75 Virginia Beach Drive, Miami, Florida 33149. This reporting is required under and is authorized under 50 CFR 622.5(a) (1) (v). Information submitted will be treated as confidential in accordance with NOAA Administrative Order 216-100. Notwithstanding any other provision of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection displays a currently valid OMB Control Number. The NMFS requires this information for the conservation and management of marine fishery resources."

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 questions will be asked about sexual behavior and attitudes, religious beliefs, or other similar matters of a private and sensitive nature.

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

Data will be conducted via personal interviews with stone crab fishermen along the west coast of Florida and lobster fishermen in the Miami River area. Interviews will be conducted by a research team headed by Manoj Shivlani at the University of Miami. The budget for this data collection was based on an estimated cost per interview that would allow 150 interviews (see Part A, response #14). However, Mr. Shivlani has indicated that up to 175 interviews could be conducted if the actual cost per interview is less than anticipated. Therefore, estimates of burden hours are presented for 150 and 175 interviews. The maximum annualized burden hours would be 58.

Burden and Labor Costs to Respondents

	Total Burden - 150 interviews	Total Burden -175 interviews	Annual Burden – 150 interviews	Annual Burden – 175 interviews
Number of Respondents	150	175	50	58.3
Responses per Respondent	1	1	1	1
Total Responses	150	175	50	58.3
Average Hours per Response	1	1	1	1
Total Response Time (Hours)	150	175	50	58.3
Labor Cost to Respondents @ $35/hour	$5,250	$6,125	$1,750	$2,042

The proposed data collection will be conducted during 2007 and will not be repeated until 5-10 years later (see Part A, response #6). Hence, the annualized estimate of total burden hours is calculated by averaging burden hours for the entire project over a three-year OMB cycle. Labor costs for respondents are calculated at $35 per hour. This is an opportunity cost rather than a cash payment. We plan to keep the opportunity costs of time as low as possible by conducting interviews at times which would not interfere with fishermen's business or recreational activities. Interviews are planned between May and October of 2007 when the stone crab season is closed. Interviewers will contact fishermen and schedule interviews at times and places convenient to the fishermen.

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 #12 above).

No recordkeeping requirements will be imposed on respondents. The proposed data collection is designed to collect information through face-to-face interviews with fishermen in which experienced interviewers will ask questions and record answers. There are no written forms or paperwork to be completed and submitted by fishermen, and no capital or start-up costs.

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

The cost of contracting with researchers at the University of Miami Rosenstiel School of Marine and Atmospheric Science to conduct the proposed data collection is $42,000, which was determined as 150 interviews @ $200 per interview plus 40% overhead for the University of Miami. Up to 175 interviews could be conducted if the actual cost per interview is less than the estimated $200. Hence, the sampling design is based on an anticipated sample of 150-175 interviews.

The labor cost of SEFSC economists to identify the sampling universe and develop a sampling plan, develop the proposed questionnaire, and prepare the OMB 83i request form and Supporting Statement is approximately $5,000.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

This is a new data collection.

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

The objective of the proposed work is to collect data with which to establish socio-economic baselines in the commercial stone crab and lobster fisheries, assess the financial and economic performance of the industry, and develop economic models to evaluate future management proposals. Data will be collected between May and October 2007, and the final database should be available to SEFSC economists by February 2008.

A report will be prepared by SEFSC economists to provide a baseline snapshot of the current status of the population of commercial stone crab fishermen along the west coast of Florida. These descriptions will use simple statistical concepts such as means, medians, variances, ranges, coefficients of variation, and frequency distributions for each sampling stratum and for the population of commercial reef fishermen. The report may be published in a journal such as *Marine Fisheries Review* or posted on the SEFSC website.

Also, data will be used to develop economic models with which evaluate future management proposals. The results of these analyses probably will not be published. Economic effects of regulation on commercial fishermen are measured as changes in producers' surplus, which are approximated as changes in total revenues minus changes in costs of production. To account for

changes in producers' surplus in a realistic fashion, analyses should include changes in fishing patterns (i.e., participation rates among fishing activities).

The questionnaire was developed to enable analyses of cost, production and potential switching behavior among fishing activities. Trip costs can be estimated in terms of duration of trip, type of gear, vessel characteristics, and fishing location. Annual fixed costs can be estimated in terms of vessel characteristics. Data can be merged with Florida trip ticket data for analyses of production in terms of trip duration, gear type, average crew size, vessel characteristics and measures of fishing skill. Sample data can characterize the decision by each vessel owner to participate in each activity as a binary (yes-no) type variable. When all vessel owners are considered together, the likelihood of participation in any activity would then be estimated as a function of net operating revenues in that activity relative to net operating revenues in alternative activities, and sociological or demographic variables.

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.

The OMB control number and expiration date will be displayed.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statement.