

**SUPPORTING STATEMENT
NORTHWEST REGION VESSEL IDENTIFICATION REQUIREMENTS
OMB CONTROL NO. 0648-0355**

A. JUSTIFICATION

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

This submission requests renewal of Office of Management and Budget (OMB) approval for a vessel identification requirement in the Pacific Coast Groundfish Fishery.

The success of fisheries management programs depends significantly on regulatory compliance. The vessel identification requirement is essential to facilitate enforcement. The ability to link fishing or other activity to the vessel owner or operator is crucial to enforcement of regulations issued under the authority of the **Magnuson-Stevens Fishery Conservation and Management Act, as amended** (including provisions at 16 U.S.C. 1853).

Vessel identification is required by all open access and limited entry commercial vessels over 25 ft. in length in the Northwest region. Vessel identification requirements are set forth in the regulations implementing the Pacific Coast Groundfish Fisheries Management Plan at **50 CFR 660.305 (a), (b), and (c)**.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

A vessel's official number must be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. The number identifies each vessel and should be visible from a distance at sea and in the air. The official number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, to ascertain whether the vessel's observed activities are in accordance with those authorized for that vessel. This identifying number is used by the National Marine Fisheries Service, the United States Coast Guard (USCG), and other marine agencies in issuing violations, prosecutions, and other enforcement actions. Law enforcement personnel rely on this information to assure compliance with fisheries management regulations. Vessels that qualify for particular fisheries are readily identified and gear violations are more readily prosecuted, allowing for more cost-effective enforcement. Cooperating fishermen also use the number to report suspicious activities. Regulation-compliant fishermen ultimately benefit as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

The information collected will not be disseminated to the public; as it consists solely of marking vessels with the appropriate vessel number. This information is not submitted to National Marine Fisheries Service (NMFS).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The requirement that each vessel display an identification number on its deckhouse or hull, and its weather deck, does not lend itself to technology. Other means of vessel identification, e.g. transponders and vessel monitoring system units, require technology and are comparatively very expensive. No other technology appears to be less costly and still capable of providing the necessary information to support enforcement. Vessel monitoring system units have been required for the limited entry groundfish fleet since 2004 and for the open access groundfish fleet since 2008. However, a vessel identification number requirement continues to be useful for basic enforcement.

4. Describe efforts to identify duplication.

Existing Federal and State reporting requirements have been reviewed to ascertain that no duplication of information collection results from this action. There is no duplication with other collections. The USCG requires the name of the vessel and hailing port be marked on its stern for documented vessels (46 CFR 67) and state-issued block numbers on the forward half of the vessel for undocumented vessels (i.e., small boats that are registered with the state) (33 CFR 173); however, vessel names, ports, and block numbers may be changed, making tracking and identification of the vessel more difficult and complex. The USCG also requires documented vessels to have their official identification number permanently marked on the vessel. However, this is usually done on an interior structural beam in the engine room. For efficient enforcement and accurate reporting, an identifying number is required on the outside of the vessel in large numbers by the National Marine Fisheries Service because a vessel's identification number does not change.

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

Although nearly all vessels in the respective fisheries are categorized as small businesses, the collection of information will not have a significant economic impact or burden on small businesses in terms of time and resources. Therefore, no special modifications of the requirements were considered necessary.

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

NMFS and the USCG could not enforce the fisheries management measures if this collection were conducted less frequently. The numbers must periodically be maintained to remain legible.

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

This collection is consistent with the 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.

A Federal Register Notice was published on February 4, 2008 (73 FR 6482). No comments were received.

Consultation outside the agency is assured by the Pacific Coast Groundfish regulatory process, set forth in the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations (Pacific Coast Groundfish Fishery Management Plan and 50 CFR 660, Subpart G). There are no issues that have not already been resolved.

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

No payments or gifts are provided.

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

No confidentiality is promised; the information is on public display.

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.

There are no sensitive questions.

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

The estimated total number of vessels affected is 1,693 vessels (406 limited entry vessels and 1,287 open access vessels). This number is an overestimate because it includes vessels under 25 feet, limited entry permits not registered to a vessel, and limited entry permits that may be stacked on the same vessel. The identifying number must be displayed on the vessel in three locations and maintained in good condition. Given the adverse weather conditions and salt water, we expect each number will need to be repainted or repaired annually. The estimated time to display or otherwise affix the number at each location is 15 minutes; 45 minutes for marking one vessel = 1 response, for a total of 1,693 responses. Estimated burden of total annual response time: 1,693 vessels x 45 minutes/60 minutes = 1,270 hours.

Labor costs probably range between \$10 and \$15 per hour, producing an annualized cost to respondents of the time burden between \$12,700 and \$19,050.

13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in #12 above).

The cost to fishermen is minimal. Materials needed are paint and paintbrush, and possibly a stencil. At an estimated cost of \$35 per vessel, the total cost burden is 1,693 vessels x \$35 = \$59,255. Given the adverse weather conditions and salt water, we expect each number will need to be repainted or repaired annually.

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

No annualized cost to the Federal government.

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

No changes or adjustments were reported in this renewal. In ROCIS, there appears to be a cost adjustment, because when the ICR was migrated to ROCIS, the cost was rounded down to the nearest thousand.

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

No results are published.

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

Not applicable.

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

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.