

SUPPORTING STATEMENT
PACIFIC COAST GROUND FISH FISHERY RATIONALIZATION SOCIAL STUDY
OMB CONTROL NO. 0648-xxxx

INTRODUCTION

The Northwest Fisheries Science Center (NWFSC) is requesting approval for a new collection of information on social and cultural impacts to members of the fishing industry to be involved in a new rationalization program for the Pacific trawl groundfish and whiting fisheries.

Please note: there is a time constraint to commence this data collection prior to the management change scheduled per regulatory guidance for January 2011. The inability to collect this data and the lack of sufficient time to collect the full breadth of this data will severely limit the ability to complete the full objectives of the research. It will negatively impact the full utility of the results for management purposes. Sufficient time is required to allow for access to fishermen when they are in port between fishing seasons that co-occur with the time available to conduct this research. **As a result of these limitations, and to allow sufficient time to collect all data for full analysis, completion of OMB review is requested prior to or by July 23, 2010.** This will provide the opportunity to utilize of all the remaining time prior to the management change to travel to collect data. It will also provide multiple opportunities for the researchers to contact participants to collect the data sought.

A. JUSTIFICATION

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

The Pacific Fisheries Management Council (PFMC) is on track per [the Magnuson Stevens Fisheries Conservation and Management Act](#) (MSA), 16 USC 1801 *et seq.*, to implement a new rationalization program for the Pacific trawl groundfish and whiting fisheries. The target date for implementation is January 2011. Changes in how fisheries are managed not only result in changes in stock assessments, stock abundance, and species recovery, but also result in changes to the people within the fishery.

Scientific literature extensively discusses the impacts rationalization programs have on fishing communities and fishermen (Ecotrust 2004, Lowe and Carothers 2008, McCay 1995, NRC 1999, Palsson and Petursdottir 2006). Social and cultural changes to fishermen, processors, and other industry members, such as net suppliers, are probable. Rationalization results such as consolidation and increased efficiency have benefits to the catch, but may have consequences on the people involved in the fishery. The extent of the social and cultural changes is correlated to the specific characteristics of the fishery being rationalized. This research aims to both generate a baseline description of the fishery and to collect sufficient data pre- and post-rationalization to identify and possibly measure changes that are related to the rationalization of the fishery.

In addition to understanding impacts within this fishery, the potential to gain more information for other fisheries managed by the PFMC is high. It is known that many fishermen diversify their fishing activity across more than one fishery. This research effort will collect data to show the movement of individuals between different fisheries. Where appropriate, data obtained can then be applied to other fisheries, contributing further to the utility of this research. In the event

future fisheries are considered for rationalization, this research effort may inform future management.

The ability to collect data prior to the management change is critical to the ability to show how the fishery changes. Without the collection of baseline data, additional studies in the future will be useful, but will not provide the ability to show explicit data depicting social changes in the system. This research will be most complete, and will provide the greatest amount of information about social and cultural characteristics of this fishery, if conducted before and after the management change.

To achieve these goals, the baseline data collection will be collected in the year prior to the implementation of the management scheduled for January 1, 2011. This baseline data would need to be collected in the summer and fall of 2010. A second research effort would collect data in the second year post-implementation. This would be the first effort to collect data post-management change. This request for three-year approval would cover both the baseline data collection and only the first of multiple post-management change data collection efforts.

This research will also support several legal requirements (see below for description), not only for this specific management change, but possibly for other fisheries that have similar legal requirements. Results will support legal requirements by illustrating the importance of the fishery to fishing communities, by taking the first step to identifying the social characteristics of the fishery, as well as initiating an understanding of the relationships between individuals in the industry. All these results will support various sections of the MSA, which requires an understanding of social data along with other laws and regulations.

MSA

The following sections of the MSA pertain specifically to the requirements needing social and cultural data. Data collected in this effort will support current and future requirements.

1) National Standard 8 Sec 301 (a)(8) states:

Conservation and management measures shall, consistent with the conservation requirements of this Act (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.

2) Requirements for Limited Access Privileges Sec.303A. (c) (1) (C) states:

*... any limited access privilege program (LAPP) to harvest fish submitted by a Council or approved by the Secretary under this section shall promote:
... (iii) Social and economic benefits.*

3) Sec. 303A (B) PARTICIPATION CRITERIA:

In developing participation criteria for eligible communities under this paragraph, a Council shall consider -

(i) Traditional fishing or processing practices in, and dependence on, the fishery;

(ii) The cultural and social framework relevant to the fishery;

...(iv) The existence and severity of projected economic and social impacts associated with implementation of limited access privilege programs on harvesters, captains, crew, processors, and other businesses substantially dependent upon the fishery in the region or subregion;

4) Sec. 404(a) refers to:

.....acquire knowledge and information including statistics, on fishery conservation and management and on the economic and social characteristics of the fishery.

The act clarifies this in Sec 404(c) (3) indicating

Research on fisheries, including the social, cultural, and economic relationships among fishing vessel owners, crew, United States fish processors, associated shoreside labor, seafood markets and fishing communities.

NEPA

[The National Environmental Protection Act](#) (NEPA) requires federal agencies to consider the interactions of natural and human environments, and the impacts on both systems of any changes due to governmental activities or policies. This consideration is to be done through the use of ‘...a systematic, interdisciplinary approach that will insure the integrated use of the natural and social sciences...in planning and decision-making which may have an impact on man’s environment;’ (NEPA Section 102 (2) (A)). Under NEPA, an Environmental Impact Statement (EIS) or Environmental Assessment (EA) is required to assess the impacts on the human environment of any federal activity. NEPA specifies that the term ‘human environment’ shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment’ [NEPA Section 102 (C)].

Executive Order 12898

The [Executive Order 12898](#) of February 11, 1994 on Environmental Justice requires federal agencies to consider the impacts of any action on disadvantaged, at risk and minority populations. To evaluate these impacts, information about the vulnerability of certain stakeholders must be better understood. Indicators of vulnerability can include but are not limited to income, race/ethnicity, household structure, education levels and age. Although some general information related to this issue is available through census and other quantitative data, these sources do not disaggregate those individuals or groups that are affected by changes in marine resource management or the quality of the resource itself. Therefore, other types of data collection tools must be utilized to gather information related to this executive order.

Regulatory Flexibility Act

The [Regulatory Flexibility \(RegFlex\) Act](#) requires federal agencies to prepare an initial and final regulatory flexibility analysis which ‘...shall describe the impact of the proposed rule on small entities...’... The initial regulatory flexibility analysis ‘...shall also contain a description of any significant alternatives to the proposed rule which accomplish the stated objectives of applicable statutes and which minimize any significant economic impact of the proposed rule on small entities. [RegFlex Section 603 (b) (5) (c)]. In addition, each final regulatory flexibility analysis shall contain ‘...a description of the steps the agency has taken to minimize the significant economic impact on small entities....’ [RegFlex Section 604 (a) (5)].

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.

Information sought will be of practical use as National Marine Fisheries Service (NMFS) social scientists will utilize the information for descriptive and analytical purposes. In addition, for current regulatory action and in the event of future regulatory action, the information may be utilized by NMFS to meet the requirements of the regulations described above in Question 1. The results of the research will also be available for use by the Pacific Fisheries Management Council, in their role in fisheries management. In addition to direct fisheries management utility, this research and the resultant data may be utilized in increased and future ecosystem management efforts. These efforts include the development of various ecosystem models which incorporate various social indicators and other social information. The results of this research will increase the availability of social data to the extent that it may significantly benefit new research efforts in ecosystem modeling. Reports will also be available for public use to support other research concepts and future research design. The frequency of the use of the data is unknown at this time and is dependent in the regulatory actions required in the future as well as public use. With that said, as this type of data has been historically unavailable, it is expected that the availability of this type of information will have high utility

The information collection tool is organized to ease the collection of the data and clearly identify the types of data being collected. The primary data collection tool is a survey instrument supplemented by interviews and short meetings with industry organizations as needed. The survey instrument is organized into various sections, which are pertinent to some or all of the intended respondents. The survey includes the following sections: Demographic Information, Individual Participation, Connections, Catch-Shares Perspectives, Fishermen, and Processors (at-sea and Shoreside) and buyers/first receivers. These sections are further described as follows.

Demographic Information: This data aims to obtain a better description of the unique population of this fishery. It will provide a more accurate description of the people within that population. Information collected in this section is comparable to United States (U.S.) Census information, but on a finer scale. The U.S. Census does not collect or provide the information at a level to be able to identify a specific population of fishermen, or fishermen as a separate industry. Information about fishermen in the census is aggregated with other types of information representing the agriculture and forestry fields. As a result, it is impossible to describe the demographics of any specific fishing community through the use of U.S. Census

data. The collection of this data in this section serves the role to describe this specific population of the people connected to this specific fishery.

Individual Participation: Data from this section increases our knowledge of the unique characteristics of the people in the industry beyond demographic information. Data gathered includes individual historical participation in the fishery, an understanding of family participation in the fishery, the roles individuals play in the fishery, characteristics of their jobs such as work schedules, and a better understanding of where they live versus where they work. Many of these areas may be affected by the management change. Work schedules, standard of living, etc., all may result in social impacts to individuals. The collection of this data will contribute to the identification of these impacts on a person-by-person basis.

Connections: Data in this section will provide information on the connections, and insight into the relationships, between individuals in the fishery. Questions aim to identify clear components of the fishery such as important business suppliers and organizations that may be critical to the functioning of the fishery. Changes in the characteristics of the fishery as a result of the management change may alter the connections and relationships in the fishery. Scientific literature speaks to these changes (McCay 1995). Data in this section will serve multiple purposes, including insight into relationships as well as the ability to measure social change in the system.

Catch Shares Perspectives: Questions in this section aim to gauge the opinions and perspectives of the individuals in the fishery about the upcoming management change. This section is intended to clearly capture respondents' concerns and expectations of the system, and their level of knowledge of the system. This information will serve multiple purposes. It will clearly identify industry members' perspectives, allow for the clear measurement of the change of these perspectives over time, as well as provide a gauge of how well-informed individuals are about the management change – contributing to NMFS' and PFMC' efforts to improve communication to the public.

Fishermen: This section is designed specifically for those members of the fishery who are either directly or indirectly involved in, and have knowledge of, any aspect of the harvest of commercial catch. For example, vessel owners whom are not on board, and permit owners, who are not on board as well as fishermen on board. Questions in this section aim to gather more information about fishermen and how they work in the industry. Information collected will help us understand the different fisheries individuals participate in; for example, the groundfish and the crab fisheries. Other information sought includes the common gears and gear combinations utilized, what factors contribute to their participation in a single fishery or multiple fisheries, where they fish in relation to where they live, how are they related to, and what are the relationships between, individuals with whom they fish, and how they are connected to processors and why. Data in this section will greatly contribute to our ability to understand where fishing communities are located and why, the characteristics of the fishery, the relationships between fishermen and processors, and a better understanding of the working system of the fishery.

Processors (At-sea and Shoreside) and Buyers/Receivers: This section is specifically designed for those members of the fishery who receive and process the commercial harvest. Individuals targeted for this section of the survey include shoreside processors, at-sea processors, motherships, and buyers/first receivers. Questions in this section aim to gather information

about a sector for which there is very little data. Data gathered will help understand the distribution of processors on the west coast, how they obtain catch, their relationships with harvesters, the flow of commercial catch from the fisherman to the consumer, and how and where they market and distribute their product. Information obtained will allow for the understanding of various species that are processed, and the importance of each to the processing businesses. The measure of these characteristics both pre- and post-rationalization will create the opportunity to better understand the impact the catch shares program has on the processing sector.

Together these survey sections, supplemental interview data, and information from meetings with industry organizations will generate a very extensive description of the fishery. The description will include the perspectives of various aspects of the industry from fishermen to processor and other related entities. This research will not only inform the current management process, but will overarch into other management issues, as well as support legal requirements to fishing communities, social impact assessments, and areas of research. This research will also increase the utility and quality of other secondary research, completed and ongoing, by providing more accurate primary data to support secondary data collection efforts.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. As explained in the preceding paragraphs, the information gathered has utility. National Oceanic and Atmospheric Administration's (NOAA) NWFSC Human Dimensions Program 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 pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

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

Data collection will be available in all forms possible. Accessibility of the research tools to study participants is critical to the success of the research. As a result, a wide range of options will be available to distribute the survey and capture the data. The primary data collection tool is a survey. The secondary mode of data collection is unstructured and semi-structured interviews. Hard copy surveys will primarily be provided to research participants in-person. The survey can then be completed in the presence of the researcher to facilitate the answering of any questions, the clarification of data being collected, and support any concerns of the research participant. In addition to administering the survey in-person, the researcher can then conduct a brief unstructured or semi-structured interview to collect any other pertinent data from the survey participant.

The survey tool will also be available in hard copy to be mailed or otherwise distributed to research participants. The survey will be available in a universal electronic format to either be electronically transmitted via email or downloaded from the internet by research participants. In the event of the dissemination of the survey other than in person, directions to access the survey and all support required to return the survey to the researchers will be provided. For example,

postage-paid pre-addressed envelopes will be provided to those research participants who request a hard copy of the survey.

4. Describe efforts to identify duplication.

NMFS social scientists and contractors work closely with regional academia, community based organizations, industry groups and other parties interested in this type of information. Reviews of existing information are common practice when initiating social science studies. A thorough literature review has identified where similar studies have been initiated and will ensure that efforts are not duplicated. The principal investigator has briefed and discussed this research to relevant NMFS personnel in both science centers, and regional offices on the west coast, as well as social science colleagues in Oregon Sea Grant Programs, California Sea Grant Programs, academia, and the PFMC. The efforts of communication have served multiple functions to include making sure there will be no duplication of effort, to communicate plans for the research effort, and to establish collaborations to complete the research in the most effective manner possible.

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

This request includes the collection of data on individuals and those who may be linked to or represent small businesses. Prior to contacting these respondents, researchers have gathered any publicly available answers to the questions. Only those questions that can not be reliably answered through this manner and may change with perspective of the respondent will be asked. In addition, participation in data collection will be voluntary. This data collection will not require any reporting or equipment cost burdens. The burden will be limited to the time required to complete the survey. Arrangements to collect data from all research participants will be at the convenience of the participant, and as flexible as possible to minimize burden on all parties.

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

In the absence of current information on the human dimensions of marine resource use and marine ecosystems, NMFS and Regional Fisheries Councils will be unable to adequately understand and predict the potential impacts of policy decisions on fishing communities and people, particularly those people who do not regularly attend public meetings, but are nonetheless affected by the decisions.

The federal mandates and executive orders, described in Question 1 and related appendices of this document, require the analysis of the impacts that government actions have on the individuals and communities involved in fishing and marine resource related activities. Social impact assessments, analysis of the affected human environment, cumulative impacts as well as the distribution of impacts with a special emphasis on vulnerable or at risk communities are all examples of these requirements. The ability of NOAA social scientists to adequately respond to this charge rests on access to timely and relevant information about the pertinent stakeholders.

A significant concern related to the quality of these analyses is the risk of being vulnerable to litigation due to the lack of fulfilling these mandates and executive orders. Therefore not collecting this information may lead to incomplete representation of the science and information.

Delays and costs due to litigation compound the issues both in the management context, and the funding context. This could impact the decision making process and negatively impact the communities subject to the decisions.

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

Information collections are consistent with OMB guidelines.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on February 5, 2010 (Vol. 75 No 24, Page 5945) solicited public comments.

One comment was received requesting a copy of the survey instrument, any instructions, and supplemental materials. A copy of the draft survey tool, inclusive of instructions, and a copy of the Fishing Community Profiles of the West Coast were mailed to the requester per the instructions provided in the comment.

In regards to consultation with persons outside the agency, various phone conferences, and in-person meetings included a discussion of the research and the option to review the draft survey document. Consultations were sought with California Sea Grant personnel, Oregon Sea Grant/Oregon State University personnel, Pacific Fisheries Management Council staff, as well as members of the fishing industry whom serve roles specific to the trawl groundfish and whiting fisheries. The intent to conduct this research as well as the opportunity to discuss it further with the principal investigator of the research, was communicated at the March 6-12, 2010 Pacific Fisheries Management Council meeting in Sacramento, CA to both the full Council panel and various subcommittees in the Council system. All comments were taken into consideration when finalizing the survey document as well as designing the research collection efforts. Communication and collaboration with all interested parties is currently and will continue to be maintained throughout and beyond the data collection and release of the final reporting documents for this research.

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

There are no plans to provide any payment or gift to respondents.

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

As stated on the survey instruments, the information provided will be kept confidential to the extent possible per MSA Sec. 402(b) and the [NOAA Administrative Order NAO 216-100](#), Protection of Confidential Fisheries Statistics. In addition, in the event of a Freedom of Information Act (FOIA) request, we will protect the confidentiality to the extent possible under the Exemption 4 of the FOIA.

To support the confidentiality of this research, no participant names will be included on the survey document. Participant names will be tracked in a separate document in order to 1) code participants for protection during data analysis, 2) confirm receipt of a survey from each individual, 3) avoid duplication of responses, 4) ensure the distribution of final reports back to research participants, and 5) track the individuals in the future for the post-rationalization impacts portion of the research.

Documents containing names will be kept in locked container such as a lock box in the field or a locked file cabinet in the office setting. All electronic versions will be kept under password protected systems, accessible only by study researchers.

When writing final reports and publishing the findings of this research, individual responses will be combined with responses from other participants so that no single individual may be identified. This aggregation of the data will follow the rule of 3, where any less than three responses will not be reported to protect confidentiality. All personal names provided will be coded by the researchers with a descriptor such as 'X Community Fisherman' or assigned a code such as 'A1' as an identifier. The type of code that will be applied to each data set may vary based on the question or the analysis required of that question. Every method to protect the confidentiality of all responses will be applied in any and all contexts of this research.

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 consequences.

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 a few different areas where issues of a potentially sensitive nature will be explored. These are listed and discussed below:

- 1. Relationship Information:** Survey questions inquire about the relationships between individuals in the fishery and the quality of those relationships. Scientific literature suggests that under a rationalized fishery the relationships between people change (McCay 1995). In addition the MSA requires knowledge of these relationships. Questions have been designed to access this information in a manner to protect the responses of the participants. In addition, questions of this nature have all been provided with options not to answer the question, in the event a survey participant is uncomfortable. This data is important to show social changes in the fishery driven directly by the characteristics of the new management system.

2. **Connectivity/Network Information:** Survey questions inquire about the connections between industry members. Who gets information from whom, who works with whom for what purposes. Scientific literature confirms rationalization of fisheries results in consolidation and the removal of some fishermen and related industries from the fishery. The collection of data on connectivity and networks will utilize the Social Network Analysis methodology to identify those networks and visually represent them. The ability to do so will provide the opportunity to study how a system may change when people within the system are removed or changed. The flow of information about management may change, the flow of product in the industry, etc. may change. The ability to map these changes pre- and post-rationalization will provide the ability to show how the fishery has changed and what impacts may result from those changes. Questions of this nature will be coded as described in the confidentiality question No. 10 of this document. In addition, questions of this nature have all been provided with options not to answer the question, in the event a survey participant is uncomfortable. This data is important to show social changes in the fishery driven directly by the characteristics of the new management system.

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

Requirement	No. of Respondents Annualized	Responses per Respondent	Total No. Responses Annualized	Response time	Total Burden/Annualized	Labor Cost in \$25 to Public Per Burden Hour, Annualized
Survey/Interview Respondents Baseline 1 st Study year	542.3	1	542.3	1 hour	542 hr, 18 min	13,557.5
Survey/Interview Respondents 1st Post-Rationalization Study year	542.3	1	542.3	1 hour	542 hr, 18 min	13,557.5
Interviews Only – Baseline Yr	16.7	1	16.7	30 min	8 hr, 21 min	208.75
Interviews Only – Post Yr	16.7	1	16.7	30 min	8 hr, 21 min	208.75
Meetings – Baseline Yr	3.3	1	3.3	1 hour	1 hr, 18min	32.5
Meetings – Post Yr	3.3	1	3.3	1 hour	1 hr, 18 min	32.5
Total Requested Per OMB 83-i	1,125		1,125		1,103 hr, 54 min (1,104hr)	27597.5

*Respondents for both the Baseline 1st Study year and the 1st Post-Rationalization year are the same respondents. As a result the number of respondents was not duplicated in the total sum.

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

No cost other than labor cost is expected.

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

Total estimated annual cost to the federal government is \$139,550 for year 1 and \$108,850 for year 2, totaling \$248,400 (annualized to \$82,800). The study is designed to be conducted in the base year prior to the fisheries management change and repeated the second year post-fisheries management change. The survey will be conducted by NMFS federal staff, contractors, and students. In addition to contractor and student costs, travel costs will be incurred to various field sites, as well as printing and mailing of surveys. Survey design, data collection and processing, and report development will be conducted by NMFS federal staff, contractor(s), and students. These estimated costs for the contractor(s) and students have been included below. Please see table below for itemized costs.

Description	FY2010 Budget	FY2012 Budget Projections
Contractor/student salary/wages	\$130,000.00	\$100,000.00
Travel		
Washington, Oregon, and California	\$ 8,000.00	\$ 8,000.00
Printing	\$ 500.00	\$ 300.00
Postage	\$ 50.00	\$ 50.00
Supplies	\$ 1,000.00	\$ 500.00
Total	\$139,550.00	\$108,850.00

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

This is a new program.

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

Several publications are expected for this research. The most complete publication will be several NMFS technical memoranda, which will have the most complete results. The first memorandum will be the baseline description of the industry from the results of the first survey. Other memoranda will be more extensive, to include an update of the baseline, and a pre- and post-management measure analysis to show any changes that have occurred in the system due to the management change. These technical memoranda will be available in hard copy and Compact Disc (CD) formats, and will be posted on the Human Dimensions website, under publications. In addition, several journal publications are expected. The exact number of publications and the journals where the results will be published are to be determined. The goal is to make sure the information is widely available for all those interested in the research.

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

Not applicable.

18. Explain each exception to the certification statement.

Not applicable.