

**SUPPORTING STATEMENT
PACIFIC COAST GROUND FISH FISHERY RATIONALIZATION SOCIAL STUDY
OMB CONTROL NO. 0648-0606**

A. JUSTIFICATION

The Northwest Fisheries Science Center (NWFSC) is requesting approval for a revision and extension of a collection of information on social and cultural impacts to members of the fishing industry who are involved in a recent rationalization program for the Pacific trawl groundfish and whiting fisheries. There have been changes made to the survey instrument because we will be collecting post-catch shares information.

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

The Pacific Fisheries Management Council (PFMC) per the [Magnuson Stevens Fisheries Conservation and Management Act](#) (reauthorized 2007) (MSA) P.I. 109-479, sec. 302.f, implemented a new rationalization program for the Pacific trawl groundfish and whiting fisheries in 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 and communities 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 mixed positive and negative 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 will collect post-rationalization data related to specific management measures of the program. This effort will represent a continued data collection per the study's design. It will allow for the comparison of newly collected data to previously collected data and the identification and measurement of social and cultural 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.

Baseline data was collected prior to the management change. Continued data collection is critical to the ability to show how the fishery changes. Without the supplemental time series data, the previous data collections will be useful, but will limit the ability to show explicit and unique 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 over time and correlated to the program's management measures.

To achieve these goals, baseline data was collected in the year prior to the implementation of the catch shares program. A second research effort collected data in 2012, the second year post-implementation. This was the first effort to collect data post-management change. This request for an additional three-year approval would cover data collection after the management measure opens the fishery up to quota share trading, which is likely to have the biggest impact on the system. This will also 1) allow for the identification of social changes as a result of both the initial implementation and the post quota trading actions, and 2) provide the most complete report for the five year review of the catch shares program by National Marine Fisheries Service (NMFS) regional office staff and PMFC personnel.

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)] (See attachment B).

Executive Order 12898

The [Executive Order 12898](#) (E.O. 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. (See attachment C)

Regulatory Flexibility Act

The [Regulatory Flexibility Act](#) (RFA) 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)] (See attachment D).

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 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, Post Catch Shares – Quota Share Owner/Manager & Vessel Account Owner/Manager, 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 recent management change. This section 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 and 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.

Post Catch Shares – Quota Share Owner/Manager & Vessel Account Owner/Manager: Questions in this section aim to understand the decisions allocation recipients made with the quota they received. Since allocations were very controversial in this particular fishery, the options to manage the allocations received are extensive. Therefore, the questions are designed to try and understand and determine common threads in actions taken by allocation recipients and how they manage their allocations over time. In addition, as this type of management system is expected to result in consolidation of the fishermen/fishery, questions in this section aim to track how that consolidation may have occurred.

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, this would include vessel owners and/or 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 who 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 that is very data poor. 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 processors 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 about 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. The National Oceanic and Atmospheric Administration (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 subject 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 breath 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.

NOAA Fisheries 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 headquarters and 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, to establish collaborations, and to complete the research in the most effective manner possible.

The baseline effort of this research study represents one of the first comprehensive efforts to study fisheries in this context related to rationalized or quota managed systems. As a result the study and its tools serve as an example and foundation for other studies similar in nature. For example, colleagues at the Alaska Fisheries Science Center are interested in conducting a similar survey in a fishery that is being considered for rationalization. Extensive efforts will be made to make sure duplicate data is not collected. Clear communication and collaboration will be maintained across offices. Efforts will be made to understand where study participants may overlap due to participation across fisheries that have been studied or overarching geographic locations (e.g. Oregon and Washington fishermen also fish in Alaska. If these fishermen have already been surveyed in Oregon and Washington, all efforts will be made to avoid duplicating the same data collection for Alaska studies).

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 about/from 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, NOAA Fisheries 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 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 12, 2013 (Vol. 78 No 29, Page 9886) solicited public comments.

One comment was received. The comment was aggressive in nature, and did not request any specific information, rather provided information and opinions that were not productive in nature. As a result the comment was forwarded through the appropriate channels and no additional action was taken.

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 who serve roles specific to the trawl groundfish and whiting fisheries. Continued and ongoing status of the existing study as well as the future data collection subject to authorization is communicated at all PFMC Meetings through presentations, as well as through the study's website. Communication and collaboration with all interested parties is ongoing and maintained throughout and beyond the data collection and release of the final reporting documents for this research.

When working with individuals above in the review process, a few key points were addressed in the development and editing of the version of the survey to be submitted with this request. These points included the aging of the fishery, gear activity, consolidation of the fishery, and income reporting concerns.

One key issue was in regards to the aging of the fishery. Many fishermen are concerned of the age of most of the fishermen and the inability for new entrants to replace older fishermen. It was observed that the information we are collecting in the survey about age, role, and generational fishing history will contribute to a greater knowledge of the age of the fleet. In addition, other questions in the survey in the *Quota Perspectives*, *Quota Shares Owners/Managers & Vessel Account Owners/Managers* sections and in the interview process will help understand limits to entry into the fishery and how this may correlate with age.

Another issue was the need for a better understanding of gear use and gear excluders (e.g. a turtle excluder device) being incorporated into the fishing process. The existing *Fishermen* section of our survey will provide gear use data and new questions in this section will help assess the use of excluders in the fishery.

Consolidation in the fishery is a primary concern and a known result of rationalization. Several sections of the survey can be analyzed together to understand consolidation and who it is affecting. Questions in the *Quota Perspectives* section, the *Fishermen* section, and the *Quota Owners/Managers & Vessel Account Owners/Managers* will provide an indication of exit from the fishery, the reasons for exit, the size of the vessels, the number of crew on those vessels, and the reasons for exit.

Concern of too much detailed information on income was discussed by fishermen. As a result, a majority of the income questions were removed from the initial survey and replaced by a single question. This single income question has been reviewed by fishermen and others and has been deemed to be acceptable. The question is located in the *Demographic* section of the survey.

As indicated all the comments were addressed either through the use of questions already included in the survey, the addition of new questions, or the removal of questions.

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 forms, the information provided will be kept confidential. Specifically, it 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 or access restricted systems (servers and desktop units), 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 consequence to themselves.

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 who, who works with who 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 change. 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.

These figures represented a 64% decrease from this initial burden hours in the original authorization. This decrease is due to more accurate knowledge of the study participants due to two previous data collection efforts.

Requirement	No. of Respondents	Responses per Respondent	Total No. Responses Annualized	Response time	Total Burden/Annualized
Survey/Interview Respondents 3 rd Effort of Data Collection (2014/15)	546	1	182	1 hour	182
Survey/Interview Respondents 4 th Effort of Data Collection (2015/16)	546	1	182	1 hour	182
Interviews Only – 3 rd Effort	65	1	22	30 min	11
Interviews Only –4 th Effort	65	1	22	30 min	11
Meetings – 3 rd Effort	12	1	4	1 hour	4
Meetings – 4 th Effort	12	1	4	1 hour	4
Total Requested Per OMB 83i	623*		416		394 hrs

*Respondents for both the 3rd and 4th Efforts are the same respondents. As a result the number of respondents was not duplicated in the total sum.

Total annualized labor costs, using a \$25 rate, are \$9,850.

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 \$153,550 for year 1 (of the extension time period – 2014) and \$159,550 for year 2 (of the extension period – 2016), totaling \$313,100 (annualized to \$156.550). 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. It is expected, based on past experience that costs increase as contract overhead rates increase, as well as increases in shipping and supply costs. As a result, the second year reflects slightly higher rates and this proposal shows slightly higher costs than the original proposal and the first two years of data collection. Please see table below for itemized costs.

Description	FY2014 Budget	FY2016 Budget Projections
Contractor/student salary/wages	\$145,000.00	\$150,000.00
Travel Washington, Oregon, and California	\$3,000.00	\$4,000.00
Printing	\$500.00	\$500.00
Postage	\$50.00	\$50.00
Supplies	\$5000.00	\$5000.00
Total	\$153,550.00	\$159,550.00

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

Program Change: Changes have been made to the survey to be able to track information as a result various options that have become active in the management measure. For example, it is expected that the ability to trade quota shares will become available in 2014. This is a dramatic change to the program that may result in various impacts that need to be measured.

Adjustments:

Minor changes will be made to the most recent post-rationalization questions that were previously authorized. Changes will be primarily limited to verb tenses and well as minor vocabulary adjustments to make the questions accurate.

In addition, changes to the number of participants have been made as a result of both the experience of the data collection during the first authorized period and the nature of the fishery under a catch shares program. To expand on this explanation, this study aims to reach as many people as possible who are linked to the fishery. For the initial authorization request, burden numbers were based on estimates of secondary data that was available and the best available knowledge of the fishery at the time. As a result of the new data collection efforts under the original authorization, better information has become available. This information and the experience of data collection have contributed to a revision of the burden calculations. Experiences such as barriers to access processor employees and the formal decline of participation by some entities have been included in the calculation for the reduced burden hours.

The nature of a catch shares program is to consolidate a fishery. While our study aims to measure this consolidation and tries to work with those who have exited the fishery under any circumstance, it has been experienced and is further suspected that fewer people will be part of the fishery to survey in the future. Many of those who were impacted after implementation have exited the fishery and have aggressively declined to participate in our research. It is expected that in the future data collection efforts, three and four years after the implementation, access to these individuals will be even more difficult. As a result, an adjustment to the burden calculations has incorporated a reduction of the responses, accounting for known areas of non-participation. While some of the responses under these circumstances have been reduced, sufficient buffer remains in the burden hours to allow a change in opinions and to absorb participation of any entities that choose to participate in the future.

It is felt that with the experience of two years of data collection and better information, the revised burden hour calculations are more accurate.

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 publications will be several NMFS technical memoranda, which will have the most complete results. Each memorandum will be extensive, to include an update of the previous results, and a comparison between previous data collection efforts and the current data collection effort to measure and show any changes that have occurred in the system due specific characteristics of the management structure. These technical memoranda will be available in hard copy and 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.