

**SUPPORTING STATEMENT
GULF OF ALASKA TRAWL GROUND FISH FISHERY RATIONALIZATION SOCIAL
STUDY
OMB CONTROL NO. 0648-XXXX**

A. JUSTIFICATION

The Alaska Fisheries Science Center (AFSC) 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 Gulf of Alaska trawl groundfish fishery.

Please note: There is a time constraint to commence this data collection prior to the North Pacific Fishery Management Council (NPFMC) taking action on the creation of a new rationalization program for this fishery. The NPFMC is expected to take final action on a program in late 2014 or early 2015. 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, OMB approval is requested prior to or by January 1, 2014.** This will provide the opportunity to travel to collect data while the NPFMC is designing the new management program and before final action is taken. It will also provide multiple opportunities for the researchers to contact participants to collect the data sought.

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

The NPFMC, formed under the authority of the [Magnuson Stevens Fisheries Conservation and Management Act](#) (reauthorized 2007) (MSA) P.I. 109-479, sec. 302.f, is currently debating designs of a new rationalization program for the Gulf of Alaska trawl groundfish fishery and is expected to take final action on a new program in late 2014 or early 2015. 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 generate a baseline description of the fishery and to collect sufficient data pre-rationalization to identify and assist in measuring changes that are related to the rationalization of the fishery in the future. This effort will represent a data collection similar in scope to a recent data collection conducted by the National Oceanic and Atmospheric Administration's (NOAA) Northwest Fisheries Science Center (NWFSC) with the Pacific Coast Groundfish Fishery (OMB Control No. 0648-0606).

In addition to understanding impacts within this fishery, the potential to gain more information for other fisheries managed by the NPFMC 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. Once the proposed data collection has been completed and the new management program put into place, a second data collection will be proposed that will allow for supplemental time series data that will allow us to show how the fishery changes with the implementation of the new management program.

To achieve these goals, the baseline data collection will be collected in 2014, while the NPFMC is deciding what the program will look like and prior to the NPFMC taking final action on the design of the program. This baseline data would need to be collected in the spring and summer of 2014. 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 second data collection will be developed once the program design has been finalized so that the effect of actual program elements can be tested for in the survey instrument.

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 (See attachment A).

- 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 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.

For current regulatory action and in the event of future regulatory action, the information may be utilized by the National Marine Fisheries Service (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 NPFMC 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 a modified version of the survey instrument used to collect data in 2010 from Pacific Coast groundfish fishery participants (OMB Control No. 0648-0606). 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, Bycatch Management Perspectives, Fishermen, Processing plant owners and managers (At-sea and Shoreside) and Processing Plant Employees (At-sea and Shoreside). 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 U.S. Census information, but on a finer scale. The United States (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 and explore the interconnectedness of participants across multiple communities. 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, Dunham et al 2013). Data in this section will be used to conduct a social network analysis of the participants in the GOA trawl groundfish fisheries in order to provide insight into relationships as well as the ability to measure social change in the system. This analysis will enable us to estimate the strength and stability of connections between communities to understand how changes in fisheries management indirectly filter through the network. We believe that the severity of impact on a community from fisheries management changes may be partly determined in part by the resilience of community networks. Therefore, the social network analysis work that will be conducted as a result of the questions in Section C will be useful to estimate the impacts of policy decisions on participants as well as how these impacts affect their extended social networks.

Bycatch Management 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' participation in fisheries management, their level of knowledge of and support for a rationalization program, and assess respondents' support for program elements that are being considered by the NPFMC for inclusion in the program design. This information will serve multiple purposes. It will clearly identify industry members' perspectives on what the new management program should look like, 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 NPFMC's efforts to improve communication with 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 onboard, and permit owners, who are not on board as well as captains and crew members on board the vessels. 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 rockfish, sablefish and halibut 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): This section is specifically designed for those members of the fishery who own or manage processing facilities that receive and process the commercial harvest in the Gulf of Alaska groundfish trawl fishery. Individuals targeted for this section of the survey include shoreside processors, at-sea processors, and floating processors. Questions in this section aim to gather information about a sector that is very data poor. Data gathered will help fisheries managers understand the distribution of processors that participate in this fishery, 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.

Processing plant employees (at-sea and shoreside): This section is specifically designed for people that work at processing facilities (not in an owner or manager role) that receive and process the commercial harvest in the Gulf of Alaska groundfish trawl fishery. Processing facilities in Alaska are well known for their use of foreign labor, some of which is brought in for seasonal work and some is brought in to join a year round labor force. Questions in this section aim to gather information about another sector that is data poor. Data gathered will help fisheries managers understand the immigration status of processing plant employees, the extent to which they rely on social assistance programs, methods of hiring plant employees, the extent to which families rely on processing facilities to support them, the distribution of temporary and permanent workforces in processing facilities that process Gulf of Alaska caught groundfish, and what options for work processing plant employees have outside of the Gulf of Alaska groundfish fishery.

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 also provide information that supports 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. NOAA AFSC Economics and Social Science Research 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 tools 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 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, the Alaska Regional Office, and the AFSC, as well as at the NPFMC, community leadership groups in the Gulf of Alaska, organizations representing the Gulf of Alaska trawl industry, and social science colleagues in academia. 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 about/from individuals and those whom 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 cannot 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 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, such as that proposed to be collected in this data collection.

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 July 5, 2013 (Vol. 78, No. 129, Page 40435) solicited one public comment. The commenter indicated that the cost burden to respondents for filling out the survey was underestimated due to the time expected to participate in the survey. A response was provided to the commenter indicating that the costs cited in the Federal Register Notice related to recordkeeping and reporting costs only and that labor costs would be reported in the PRA submission.

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 members of the fishing industry whom serve roles specific to the Gulf of Alaska groundfish trawl fishery, the Kodiak Rural Regional Leadership Forum, the Alaska Groundfish Databank, NPFMC staff, members of the NPFMC Scientific and Statistical Committee, and social scientists at the Northwest Fisheries Science Center. Continued and ongoing status of this study as well as any future data collections will be communicated 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.

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.

Each questionnaire will have a number of references to the confidential nature of the survey. The statement "All responses are confidential" will appear on the front page of the questionnaire. Page i provides answers to some anticipated questions about the project, including:

"ARE MY ANSWERS CONFIDENTIAL?" This is a confidential survey. Analysis of the survey results will be anonymous. Some of the information will be aggregated as well. Information in this survey will be subject to the confidentiality requirements of the National Marine Fisheries Service per MSA Sec. 402(b) and the [NOAA Administrative Order NAO 216-100](#), and will not be provided or presented in any way as to identify individual respondents."

In the survey instructions on page 3, the respondent is instructed not to write their name anywhere on the survey. Page 3 also provides an explanation of confidentiality that describes the steps that we are taking to preserve the confidentiality of respondents and provides citations for our legal ability to keep the information confidential:

“The information you provide will be kept confidential to the extent possible per the Magnuson-Stevens Fishery Conservation and Management Act (as amended) Sec 402(b) and 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 the following processes are in place:

- Your name will not be included on the survey document. It will be tracked in an alternate document to reduce duplication, to account for your participation in the survey, and code your name as needed for the data analysis. Access to this document will be limited to researchers working on this study and protected via confidentiality agreements.
- All personal names provided on the survey document as answers to questions, will be viewed only by the study researchers. The names will either be coded 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 the data for each applicable question may vary based on the question itself or the associated analysis of question.
- As researchers write final reports and publish the findings of this research, your responses will be combined with responses from other participants so that no single individual may be identified.”

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 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 aggregated 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; Dunham et al 2013). 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 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 Question 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.

A census will be attempted of all respondent populations for which AFSC has names and contact information. This includes all catcher vessel owners, catcher-processor vessel owners, shoreside processing plant owners and managers, and floating processing plant owners and managers. For all other respondent populations, the number of people in the population can only be estimated (see table below). As such, we will attempt to complete a census of all potential respondents that we can identify, including catcher vessel crew members, catcher-processor crew members, shoreside processing plant workers, floating processing plant workers, and fisheries support businesses. In 2014, the total number of potential respondents across all respondent categories is estimated to be 2,137. For an explanation of how the number of estimated respondents per respondent category was determined, please refer to Question B.1. In order to calculate labor costs to the public associated with responding to this survey, a standard value of \$25 per burden hour per respondent was used.

A minimum of a 60% response rate (1,284 completed surveys) is expected for this population based on the literature (Babbie, 2007; Salant and Dillman, 1994). This response rate is also based on our experience with implementing other surveys in Alaska and the results of a similar study conducted in 2010 by a researcher at NOAA’s Northwest Fisheries Science Center with the same collection methodologies (OMB Control No. 0648-0606). Given that a census of each respondent population will be attempted, the results are expected to sufficiently represent the study population. Analysis of the results will be conducted to include the response rate for each question as well as an analysis of item non-response. This is an important aspect of the research as the option to skip questions is being provided as an additional layer of confidentiality. The strength and accuracy of each piece of data will therefore be represented through the response rate of the question, in addition to the overall response rates.

Data collection is planned to be conducted only one time in 2014. Additional OMB clearance will be sought once the rationalization program has been fully designed in order to conduct a post-rationalization survey of the study population. Thus, the total burden hours for this baseline survey are expected to be 1,023 hours.

Description	No. estimated target respondents	Estimated response (60% response rate)	Response time per respondent**	Total burden (hours)	Labor Cost -\$25 to Public Per Burden Hour
Catcher Vessel Owners/Operators*	178	107	1 hour	107	\$2,675
Catcher-Processor Owners/Operators*	36	22	1 hour	22	\$550
Stationary Floating Processor Owners/Operators*	8	5	1 hour	5	\$125
Shoreside Processor Owners/Managers†	36	22	1 hour	22	\$550
Shoreside Processing Workers	472	283	30 minutes	141.5 (142)	\$3,550
Stationary Floating Processing Workers	128	77	30 minutes	38.5 (39)	\$975
Catcher Vessel Crew	366	220	1 hour	220	\$5,500
Catcher-Processor Crew	630	378	1 hour	378	\$9,450
Fishery Support Businesses	173	104	30 minutes	52	\$1,300
Misc. Fishermen/Processors – Unstructured interviews ONLY	100	60	30 minutes	30	\$750
Fishery Related Organizations – Meetings	10	6	1 hour	6	\$150
Total	2,137	1,284		1,023 hours	\$25,575

*Some vessels and permits are co-owned, but both owner names are not listed in the permit data, so additional respondents were added to account for vessels with more than one boat owner.

† Personal communications alluded to some processors being owned by more than one individual. An exact number of these instances was not able to be obtained.

* An average response rate was calculated as 60%. Personal communications suggest access to shoreside processor employees will be extremely difficult. As a result, a lower response rate is anticipated from this pool of respondents even though the calculations here show a 60% response rate overall.

** An average response time of one hour is assumed for people that are directly involved in the fishery and are likely to be more knowledgeable about the proposed catch share management plan and want to discuss it with us more. An average response time of 30 minutes is assumed for respondents that are connected to the fishery, but are expected to answer fewer sections of the survey and not be as knowledgeable about the proposed management change.

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 \$149,999. The survey will be conducted by NMFS federal staff and contractors. In addition to contractor 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 and contractor(s). These estimated costs for the contractor(s) have been included below. Please see the table below for itemized costs.

Description	FY2014 Budget
Contractor rates	\$128,675.00
Travel	\$14,890.00
Printing	\$5,009.00
Postage	\$1,000.00
Supplies	425.00
Total	\$149,999.00

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 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-post management measure analysis to show any changes that have occurred in the system due to the management change once the post-rationalization data collection is completed. These technical memoranda will be available in hard copy and CD formats, and will be posted on the Economics and Social Science Research Program 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.