

**SUPPORTING STATEMENT  
U.S. WEST COAST COMMERCIAL ALBACORE  
FISHERY COST-EARNINGS SURVEY  
OMB CONTROL NO. 0648-XXXX**

**A. JUSTIFICATION**

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

Commercial fisheries economic data collection programs implemented by the National Marine Fisheries Service (NMFS) address statutory and regulatory mandates to determine the quantity and distribution of net benefits derived from living marine resources as well as predict the economic impacts from proposed management options on commercial harvesters, shore side industries, and fishing communities. In particular, these economic data collection programs contribute to legally mandated analyses required under the [Magnuson-Stevens Fishery Conservation and Management Act](#) (MFCMS), the [National Environmental Policy Act](#) (NEPA), the [Regulatory Flexibility Act](#) (RFA), and [Executive Order 12866](#) (E.O. 12866).

**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.**

The NMFS Southwest Fisheries Science Center (SWFSC) proposes a one-time fleet-wide survey of the West Coast based commercial albacore fleet to collect annual earnings and industry related expenditures for tax reporting years of 2013 and 2014. The project is being conducted by Lisa Wise Consulting, Inc., a California-based consultant with targeted experience in the commercial albacore fishery and in collecting human informant data. The survey targets fixed and variable economic cost data, including labor and crew compensation methods; hard costs such as gear, operations, and maintenance; and soft costs such as financing, insurance, and regulatory compliance. Earnings data to be collected includes sales by customer type and earnings by location (Washington, Oregon, California, or Other). The survey is designed to also capture qualitative information on other fisheries in which commercial albacore fishermen participate.

Given the absence of mandatory cost reporting requirements, the survey is intended to inform economic analyses in technical reports such as Regulatory Impact Review and Regulatory Flexibility Analysis. Survey results are intended to assist policy makers in efforts to design and improve policy to positively affect outcomes in the commercial fishing industry, and increase public benefits.

The survey is also intended to assist NMFS in developing a more comprehensive understanding of the economics of the U.S. commercial fishing industry by informing the Input-Output Model for Pacific Coast Fisheries (IO-PAC) and is also intended to provide more accurate information and inform future IO-PAC model revisions.

The initial section of the survey (**CONTACT INFORMATION FOR SURVEY RESPONDENT**) requests contact information for survey participants. The next section (**VESSEL OWNERSHIP AND CHARACTERISTICS**) requests vessel identification information and basic characteristics of the vessel which have implications for the scope of fishing methods and cost of fishing effort. The next two sections (**OTHER FISHERY 1, OTHER FISHERY 2**) ask for basic information on which fisheries the respondent participated in. The next section (**FISHING METHODS**) requests information on what methods were used. After this, we have a section (**ANNUAL COSTS AND REVENUES**) which

requests information on fixed costs of participating in commercial fishing activities (**FIXED COSTS – ALL FISHERIES**) followed by successive sections for the respondent to enter variable costs and ex vessel revenue data for participation in the albacore fishery, only. In addition, we request information for the albacore fishery component of activity, only, on sales by customer type (**BREAKDOWN OF ALBACORE SALES BY CUSTOMER TYPE**) and crew compensation (**CREW COMPENSATION WHILE TARGETING ALBACORE**). The breakdown of cost information in our survey format is designed to facilitate the use of cost information collected to parameterize an IO-PAC model of the fishery which can be used to estimate regional economic impacts.

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. However, data will not be released for public use except in aggregate statistical form without identification as to its source. NMFS 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.

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 a 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.**

Hard copies of the survey will be distributed via U.S. Postal Service as well as at industry events such as annual meetings. Instructions on the return of completed surveys will include return post, email or hand collection, where appropriate. In cases of delay and/or non response, follow up emails, phone calls or personal interviews will be conducted.

Completed surveys will be scanned or read from an emailed file and the data will then be entered manually in a database. Data entered online will be saved in real time. The survey will be pretested with no more than nine vessel owners and representatives from the two major commercial albacore industry associations. The data obtained from pretesting will not be saved. There will be no other means to submit data or information for the purposes of this study.

**4. Describe efforts to identify duplication.**

The last cost earnings survey of the West Coast commercial albacore fleet was conducted in 2002 by the American Fisherman's Research Foundation (AFRF). We are not aware of any surveys currently or planned, aimed at collecting cost and earnings data on the vessel level in this fishery.

The Pacific Fishery Information Network (PacFIN) compiles a database of landings records submitted by the California, Oregon and Washington Departments of Fish and Wildlife. PacFIN records represent mandatory landings records (fish tickets) submitted to state departments of fish and wildlife, which provide landings by species measured by weight and ex vessel revenues; however, no cost data is collected.

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

The potential respondent universe for this survey is the owners or operators of all active West Coast vessels primarily targeting Pacific albacore tuna in 2013 and 2014. The burden to vessel owners will be

minimized by providing postage-paid envelopes to return completed surveys and by providing respondents with the option to complete and submit the survey online. Respondents can also print the survey form directly from the internet for their own records or can save an online version for later access. That this is a one-time survey which will significantly reduce respondent fatigue and costs associated with completing the survey.

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

Lack of information on vessel operating costs severely limits the ability of economists to assess the impacts that commercial albacore fishermen face due to changes in regulations, fishing conditions, and market conditions. Without this information, analyses that attempt to assess the economic effects of proposed regulations or policy alternatives on vessels, crew and the fishery as a whole are incomplete and inaccurate.

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

Not Applicable.

**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 March 18, 2014 (73 FR 56 (15959)) solicited public comments. No comments were received.

Representatives from the two major associations in the West Coast commercial albacore industry also had the opportunity to review and comment on the survey. While gaining and maintaining support for the survey is an on-going task and component of the project, project managers have received positive and constructive feedback from fishermen and industry leaders, the Western Fishboat Owners Association (WFOA) and the American Albacore Fishing Association (AAFA) whose members account for the majority of the total U.S. West Coast commercial albacore landings and earnings,

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

The project does not include payments or gifts to respondents.

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

Respondents are assured in the introductory language of the survey instrument that data will not be released for public use except in aggregate statistical form without identification as to its source and that no individual names, vessel names, or other identifying information will be included in any reports or publications. Personally identifiable information is requested to enable Lisa Wise Consulting, Inc (LWC) to follow up where necessary and clarify or complete individual responses and/or to conduct a spoken survey with respondents who are unable, unwilling or prefer it. As such, the information is provided to boost the completeness, accuracy and response rate of the survey. As stated above, no information linking PacFIN identifiers with survey response results will be released in any reports or publications, or to NMFS or any other individual or organization.

**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.**

The survey seeks information on the cost and earnings of a commercial albacore vessel landing on the West Coast of the U.S. and does not include questions on sexual behavior, attitudes, beliefs, or other private information.

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

The public reporting burden for this voluntary collection of information is estimated to average two and a half (2.5) hours per respondent. This includes the time required to read the introductory statement and the gathering of business information necessary to complete the survey. The response rate is expected to be near 60%, resulting in approximately 270 returned surveys. As a result, the survey is expected to impose a total of 675 burden hours on the U.S. West Coast commercial industry.

Approximate total number of participants	450
Approximate sample size	450
Approximate expected survey response rate	60%
Approximate expected # survey respondents	270
Average burden hours/survey	1 hours, 30 minutes
Total annual burden hours	675

**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 recordkeeping or reporting cost is anticipated due to the use of postage-paid envelopes.

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

Total estimated cost to the Federal Government will be \$15,000. A private firm, Lisa Wise Consulting, Inc. has been hired to develop, administer and collect the survey, tabulate the survey data, conduct follow up contacts, and enter and validate the data. In addition to survey firm contract costs, there will be additional costs for meetings, project management, and phone and email communication and for supplies. *A table of itemized costs is presented below.*

<b>Description</b>	<b>Estimated Cost</b>
<i>Data Collection</i>	
Survey development and review	\$1,500
Outreach to industry	\$400
Administrative support	\$1,500
<i>Data Preparation</i>	
Data Verification/Checks	\$800
Development of Population Weighing Adjustments	\$800
Project Management	\$10,000
<b>Total</b>	<b>\$15,000</b>

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

This is a new collection.

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

Survey results will be reported in SWFSC's administrative report and published on the NMFS web site. Summaries will include descriptive statistics (such as mean and standard deviation) of the various cost and earnings categories.

Survey results will be reported over time through a series of studies prepared for fisheries management. Results may also be discussed in conference presentations, public meetings, and technical guides. All reporting of survey results will conform to data confidentiality requirements. Qualified researchers with confidentiality agreements will have access to raw data for performing future analyses.

**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.