

**SUPPORTING STATEMENT
WEST COAST REGION HIGHLY MIGRATORY SPECIES
VESSEL IDENTIFICATION REQUIREMENTS
OMB CONTROL NO. 0648-0361**

A. JUSTIFICATION

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

This request is for extension of this information collection. Due to a recent region name change, the name of this collection has been changed from “*Southwest Region Vessel Identification Requirements*” to “*West Coast Region Highly Migratory Species Vessel Identification Requirements*”.

The success of fisheries management programs depends significantly on tracking catch and effort of participants as well as their history of regulatory compliance. The vessel identification requirement is essential to facilitate these objectives. The ability to link fishing or other activity to the vessel owner or operator is crucial to enforcement of the regulations issued under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) to govern domestic and foreign fishing, and under authority of laws implementing international treaties.

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.

In the domestic Southwest Region fisheries regulated under [50 CFR Part 660](#), the vessel's official number is required to be displayed on the port and starboard sides of the deckhouse or hull, and on an appropriate weather deck. The number identifies each vessel and should be visible at distances at sea and in the air. The requirements affect United States (U.S.) vessels participating in the West Coast HMS fisheries (and West Coast coastal pelagic fishing vessels), with the exception of HMS Charter Recreational Vessels for which an exemption was granted and became effective September 5, 2007^a. These vessels are no longer bound by the vessel marking requirements under consideration.

The identification number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, in order to ascertain whether the vessel's observed activities are in accordance with those authorized for that vessel. The identifying number is used by the National Marine Fisheries Service (NMFS), the United States Coast Guard (USCG), and other marine agencies in issuing citations, prosecutions, and other enforcement actions (including State agencies). Vessels that qualify for particular fisheries are readily identified, and this allows for more cost-effective enforcement. Cooperating fishermen also use the number to report suspicious activities

^a Copy of the final rule for this exemption can be found at 72FR43563

that they observe. Regulation-compliant fishermen ultimately benefit as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

Although the information collected (vessel identification number) is not confidential, it will not be disseminated to the public. The information is strictly for enforcement purpose or use by National Oceanic and Atmospheric Administration (NOAA) Fisheries internally in situations involving damage, loss, and civil proceedings,

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

The requirement that each vessel display an identification number on its deckhouse or hull, and its weather deck, does not lend itself to collection via information technology. Transponders and vessel monitoring system units are comparatively expensive and their signals cannot be accessed directly by the USCG in the air or by its vessels at this time. No other technology appears to be less costly and still capable of providing the necessary information to support enforcement.

4. Describe efforts to identify duplication.

There is no duplication with other collections. The USCG requires that the name of the vessel be marked on its hull, and this requirement fulfills the USCG requirement.

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

All of the vessels are categorized as small businesses. The collection of information will not have a significant impact on these small businesses, and no special modifications of the requirements were considered necessary to accommodate the needs of these small businesses.

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

NMFS and the USCG could not enforce the fisheries management measures if the collection is not conducted or is conducted less frequently.

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

No special circumstances require the collection to be conducted in a manner inconsistent with the 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 (FRN) published on May 20, 2014 (79 FR 28896) solicited public comment. No comments were received in response to the FRN.

In an effort to more accurately describe the information collection burden, two affected fishermen associations' representatives were independently consulted via email and telephone after publication of the FRN. These associations collectively represent approximately 600 vessels affected by the vessel marking requirements. After these associations had the opportunity to consult with some of their members, brief comments were communicated back to NMFS. One association indicated that they generally support the requirements, and the other indicated that the painting of the vessel numbers on the hull and weather deck generally occurs every 2 years in association with other vessel maintenance work. In response to this information, NMFS has re-calculated its burden and cost estimates to reflect responses every two years, rather than annually.

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

No payments or gifts are provided.

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

There is no assurance of confidentiality provided. This is public information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no sensitive questions.

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

The estimated total number of vessels affected is approximately 1700, which includes purse seine, troll/baitboat, hook-and-line, drift gillnet, and harpoon fishing vessels. For all but the purse seine vessels, the burden is estimated at 45 minutes each (15 minutes for each of three locations on the vessel). For the purse seine vessels, the burden is estimated at 1 hour and fifteen minutes (15 minutes for each of three locations on the vessel plus 15 minutes each for one skiff and one helicopter). The total estimated burden for painting

every two years is:

$$\begin{array}{rcl} 1,694 \text{ vessels} \times 45 \text{ minutes} & = & 1,270.5 \text{ hours} \\ 6 \text{ vessels} \times 1 \text{ hour, } 15 \text{ minutes} & = & \underline{7.5 \text{ hours}} \\ & & 1,278 \text{ hours} \end{array}$$

Annualized Total = 639 hours.

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).

The only cost to respondents is the cost of the paint to apply the vessel's official number if a new permit or to re-apply paint to the official number if part of routine maintenance. It is assumed the vessel is equipped with paint brushes. At \$9 per vessel, the estimated annual cost would be \$7,650 (\$9 x 1,700/ 2 years).

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

There is no cost to the Federal government.

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

Adjustments: There are 370 more vessels affected by this requirement than there were in 2011. However, due to comments from fishermen associations regarding vessel maintenance every 2 years, as opposed to one year, in the affected group, burden and cost per vessel are reduced. There is a net reduction from 1330 to 850 estimated annual responses, from 1,099 hours to 639, and from \$13,095 to \$7,650 in estimated annual costs.

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

No results are published.

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

Not Applicable.

18. Explain each exception to the certification statement identified.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.