

**SUPPORTING STATEMENT**  
**ALASKA CHINOOK SALMON ECONOMIC DATA REPORT (EDR)**  
**OMB CONTROL NO. 0648-0633**

This request is for extension of an existing information collection.

## **INTRODUCTION**

National Marine Fisheries Service (NMFS), Alaska Region manages the groundfish fisheries in the Exclusive Economic Zone off Alaska. The North Pacific Fishery Management Council (Council) prepared the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (FMP) under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#), 16 U.S.C. 1801 *et seq.* (Magnuson-Stevens Act). The FMP is implemented under regulations at [50 CFR part 679](#).

NMFS manages the Bering Sea pollock fishery under the [American Fisheries Act](#) (AFA) (16 U.S.C. 1851). The AFA “rationalized” the Bering Sea pollock fishery in part by allowing for the formation and management of fishery cooperatives. AFA fishing vessels harvest pollock using pelagic (mid-water) trawl gear, which consists of large nets towed through the water by the vessel. At times, Chinook salmon and pollock occur in the same locations in the Bering Sea. Consequently, Chinook salmon are incidentally caught in the nets as pollock is harvested. This incidental catch is called bycatch and is also called prohibited species catch (PSC). Chinook Salmon are defined as a prohibited species because they are caught by a vessel issued a Federal Fisheries Permit under [§ 679.4\(b\)](#) while fishing for groundfish (pollock) in the Bering Sea and Aleutian Islands Management Area (BSAI) or Gulf of Alaska.

The Chinook Salmon Economic Data Report (Chinook Salmon EDR), also known as Amendment 91 EDR, was implemented in 2010 to evaluate the effectiveness of Chinook salmon bycatch management measures for the Bering Sea pollock fishery. The Chinook EDR Program provides information to the analysts and the Council and is intended to evaluate the effectiveness of the Chinook Salmon Incentive Plan Agreement (IPA) (see OMB Control No. 0648-0401). The Chinook EDR Program is intended to evaluate where, when, and how pollock fishing and salmon bycatch occur and to provide data to study and verify conclusions drawn by industry in the IPA annual reports.

The Amendment 91 EDR program is managed primarily by the Alaska Fisheries Science Center, with support from NMFS Alaska Region, and is administered in collaboration with Pacific States Marine Fisheries Commission (Pacific States). The EDR is a mandatory reporting requirement under 50 CFR 679.65 for all entities participating in the AFA BSAI pollock trawl fishery, including vessel masters and businesses that own or lease one or more AFA-permitted vessels active in fishing or processing BSAI pollock, Western Alaska Community Development Quota (CDQ) groups receiving allocations of BSAI pollock, and representatives of Sector entities receiving allocations of Chinook salmon prohibited species catch (PSC) from NMFS. The EDR program is comprised of three separate survey forms:

- ◆ Chinook Salmon PSC Allocation Compensated Transfer Report (CTR) – collects transfer and monetary compensation information for Chinook Salmon PSC allocations;
- ◆ Vessel Fuel Survey – collects fuel consumption and average fuel costs; and
- ◆ Vessel Master Survey – collects vessel master impressions of fishing experiences during the year and of Chinook salmon PSC avoidance efforts.

Distinct conditions that require an entity to submit one or more of the respective forms are discussed in more detail below. In addition to the EDR program, the data collection measures developed by the Council also specified modification of the Daily Fishing Logbook (DFL) (see OMB 0648-0213) for BSAI pollock trawl CVs and CPs (implemented in for the 2012 fishing year) to add a "checkbox" to the tow-level logbook record requiring vessel operators to indicate instances when a vessel fishing pollock in the BSAI changed fishing locations, prior to each tow, for the primary purpose of avoiding Chinook salmon PSC. For AFA catcher/processors, this information is recorded in the Trawl Catcher/processor Electronic Logbook (see OMB 0648-0515) and submitted to NMFS via the eLandings system.. Amendment 91 EDR forms can be accessed online at <http://www.alaskafisheries.noaa.gov/sustainablefisheries/bycatch/salmon/chinook/edr/default.htm>.

NMFS uses data from these collections to compare the annual, seasonal, and, where possible, trip-level and haul-level changes in the behavior of the pollock fleet by sector, cooperative, and vessel. The Bering Sea pollock fishery is managed under the AFA. The four AFA sectors are: Catcher/processor, mothership, inshore processor, and community development quota (CDQ). NMFS allocates annual transferrable or non-transferrable Chinook salmon PSC to members of a qualifying catcher/processor sector, mothership sector, inshore cooperatives, and CDQ groups. Chinook salmon PSC may be transferred between these entities and among members of each entity.

NMFS sends login credentials for use with the online Chinook Salmon EDR submittal site to submitters by certified mail. The combination of the login credentials and the signature certification statement on the online form are equivalent to a signature for confidentiality and accuracy purposes. In addition, all AFA vessel owners and other known entities subject to Chinook Salmon EDR submission requirements are contacted directly by Pacific States with instructions for using the EDR web application to submit the required forms.

## **A. JUSTIFICATION**

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

The Chinook Salmon EDR Program provides additional data to assess the effectiveness of the Chinook salmon bycatch management measures implemented under Amendment 91 to the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area. The information collected is a combination of quantitative and qualitative data to conduct

descriptive and quantitative analysis and comparisons of the annual and seasonal changes in the pollock fleet under Amendment 91.

**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.**

**a. Annual Chinook Salmon PSC Compensated Transfer Report (CTR)**

An owner or leaseholder of an AFA-permitted vessel and the representative of any entity that received an allocation of Chinook Prohibited Species Catch (PSC) from NMFS must complete and submit the Certification Page (Part 1) of a PSC Compensated Transfer Report (CTR) each year, for the previous calendar year.

Any person who transferred Chinook salmon PSC allocation after January 20, and paid or received money for the transfer, must submit a completed CTR (Part 1 and Part 2) for the previous calendar year.

This CTR is intended to provide information to fishery managers to evaluate the effectiveness of Chinook salmon bycatch management measures. The CTR collects information on transfers of Chinook salmon PSC allocation to or from another person during each calendar year for which the transferor or transferee paid or received monetary compensation. Compensated transfers are those transfers that include monetary compensation for a part of or the whole value of the transferred Chinook PSC allocation.

A compensated transfer is a transfer that is paid for with an exchange of dollars (or any currency) for bycatch units from one party to another for a part of or the whole value of the transferred Chinook PSC allocation. The purpose of the CTR is to account for Chinook salmon PSC transfers and the amount of money exchanged for transfers between AFA vessel owners and other entities transferring Chinook salmon PSC. NMFS would examine data reported for each transaction and tabulate the data to compare the amount of Chinook salmon PSC transferred in each transaction, number of transactions by vessel type (sector and AFA cooperative), and time intervals of the transfers in a season or year. Also, this data will allow for tabulation of the average and variation in price paid for transactions by vessel operation type, sector, and AFA cooperative.

Information on the affiliation of transferor and transferee will be used to determine the independence of the parties of any reported compensated transfer. This is required to differentiate market-based transactions and associated prices from transfer payments between affiliated or integrated entities.

The majority of the respondents are vessels engaged in either catching or catching and processing pollock. Some of the catcher vessels and catcher/processors in this fleet are owned by firms that also own inshore processing plants. Owners of inshore processing plants may also

be familiar with specific Chinook salmon PSC transfers, and thus, are potential respondents for the CTR.

The CTR Certification Page or entire CTR must be submitted online on or before 1700 hours A.L.T. on June 1. Submit EDR online at <https://chinookedr.psmfc.org>.

### **Compensated Transfer Report (CTR)**

#### **Part 1. Certification page**

##### Entity information

- Entity type (Check one)
- Name of reporting entity
- AFA permit number or entity NMFS ID

##### Submittal of CTR

###### **If submitting Certification Page Only**

- You are the owner or leaseholder of an AFA permitted vessel or  
A representative of an entity
- That received an allocation of Chinook PSC from NMFS and  
no financial transactions occurred

###### **If submitting entire CTR form (both Parts 1 and 2)**

- You are the owner or leaseholder of an AFA permitted vessel or  
A person or representative of an entity

**Who paid or received money for a transfer** of Chinook salmon PSC allocation after January 20

##### Person completing this report

- Select appropriate description of person completing form
- Name and title or NMFS ID
- Business telephone number, business fax number, and business email address (if available)

##### Certification

- Signature of owner or leaseholder
- Date signed

#### **Part 2. Chinook Salmon PSC allocation transfer information**

Report each transfer of Chinook salmon PSC allocation to or from another person or entity during the calendar year for which you paid or received monetary compensation. Compensated transfers are those transfers that include monetary compensation for a part of or the whole value of the transferred Chinook PSC allocation

NMFS ID -- identify the other person who paid or received money for each transfer

- If other person was a vessel owner/leaseholder, record AFA vessel permit number
- For other persons, record NMFS ID.
- If AFA vessel permit number or NMFS ID is unavailable, record the entity name

Direction of transfer -- indicate if the Chinook salmon were transferred (sold) to another person by you, or transferred (bought) from another person by you.

Date of transfer -- record the date Chinook salmon were transferred to the receiving person. This may not be the date of final settlement on terms of compensation

Transfer type -- Identify the type(s) of association between you and the other entity in the transfer

Entity type -- indicate the entity type of the other party in the Chinook Salmon PSC allocation transfer.

#### **CHINOOK SALMON PSC ALLOCATION TRANSFERRED AND COMPENSATION**

Number of Chinook salmon transferred

Payment amount (\$US)

- record the total amount of money in U.S. dollars for each transfer. Report all payment as of the date of submission of this form. This includes all money paid for the transfer regardless of whether other assets, such as pollock quota, are included in the transaction. Do not report any compensation made in any form other than monetary compensation.

Other assets included -- If the transaction included assets other than Chinook salmon and monetary compensation, indicate this using the checkbox. Other assets could include pollock quota, goods, or services of value. Do not check the box if additional assets included only assets of nominal or no value.

Changed number of respondents from 200 to 1; No compensated transfer reports were submitted for 2012 or 2013. Changed method of submittal to online only.

<b>Compensated Transfer Report, Respondent</b>	
<b>Estimated number of respondents</b>	<b>1</b>
<b>Total annual responses</b>	<b>1</b>
Responses per respondent = 1	
<b>Total burden hours</b>	<b>40 hr</b>
Hours per response = 40 hr	
<b>Total personnel cost (\$75/hr x 40)</b>	<b>\$3,000</b>
<b>Total miscellaneous costs (submitted Online)</b>	<b>0</b>

<b>Compensated Transfer Report, Federal Government</b>	
<b>Total annual responses</b>	<b>1</b>
<b>Total burden hours</b>	<b>10 hr</b>
Estimated hours per response = 10 hr	
<b>Total personnel cost (\$75/hr x 10)</b>	<b>\$750</b>
<b>Total miscellaneous costs</b>	<b>0</b>

## **b. Vessel Fuel Survey**

An owner or leaseholder of an AFA-permitted vessel must submit a completed Vessel Fuel Survey for each vessel used to harvest pollock in the Bering Sea in a given year.

The Vessel Fuel Survey collects information on the estimated quantity and cost of all fuel consumed by each AFA vessel harvesting or processing pollock during the calendar year. This survey collects data on average fuel use fishing and transiting and annual fuel use and costs. Data are reported on a vessel basis annually. These data, when used with existing data and data concerning Chinook salmon avoidance efforts, allow analysts to examine fuel use and costs associated with choices of fishing grounds and Chinook Salmon PSC avoidance.

These data, combined with other information in the Chinook Salmon EDR Program, provide information on movements of a vessel to avoid Chinook salmon, and in particular, Chinook salmon bycatch. Fuel use and price data are not available for vessels in the pollock fishery in any uniform format. NMFS would apply fuel usage data to assess the extent to which fleet members are willing to incur these expenses to avoid Chinook salmon PSC. These data could provide useful estimates of fuel usage for evaluating Amendment 91 effects.

The Vessel Fuel Survey is available through the Internet on the NMFS Alaska Region website at <http://alaskafisheries.noaa.gov/sustainablefisheries/bycatch/salmon/chinook/edr/default.htm> or by contacting NMFS at 206-526-6301. The vessel owner or leaseholder must electronically submit all completed Vessel Fuel surveys on or before 1700 A.l.t. on June 1.

## Vessel Fuel Survey

### **Part 1: Certification Page**

#### AFA-permitted vessel and owner identification

Vessel Owner/ Leaseholder name and NMFS ID

Vessel name and AFA permit number

#### Submittal of vessel fuel survey

Select one of the following statements

You were the AFA permit holder or leaseholder for an AFA-permitted vessels **that harvested or processed AFA pollock** during the calendar year.

Complete and submit **entire vessel fuel survey** form for the calendar year.

In addition, submit all the vessel fuel surveys received from and completed by hired masters on that same vessel

You were the AFA owner or leaseholder for an AFA permitted vessel **that did not harvest or process AFA pollock** during the calendar year.

Complete and submit the **Certification Page only**

#### Person submitting this report

Name and title or NMFS ID

Business telephone number, business fax number, and business email address (if available)

#### Certification

Signature

Date signed

### **Part 2. Vessel Fuel Consumption and Cost**

For each vessel operated in the AFA pollock fishery during calendar year

#### AFA Vessel permit number

#### Average rate of fuel consumption

Report the average rate of fuel consumption under average operating conditions during the calendar year

Report the fuel consumption rate separately for operating while fishing (towing) and not fishing (operating while transiting. traveling between points on fishing grounds, but not towing)

Report fuel consumption rates for the pollock fishery only

For motherships, report the rate of fuel consumption for transiting only

If you do not have equipment on the vessel for actively monitoring the rate of fuel usage, provide the most accurate estimate you can based on the best information you have available

#### Annual Fuel Loaded-

For each vessel, report the total amount of fuel loaded to the vessel, in gallons, during the calendar year

#### Annual Fuel Cost

For each vessel, report total cost of fuel for this vessel during the calendar year. Include all fuel that was loaded and invoiced, even if not completely used or paid for during the calendar year.

Do not include lubrication and fluids costs other than fuel.

Changed number of respondents from 109 to current 105. Changed method of submittal to online only.

<b>Vessel Fuel Survey, Respondent</b>	
<b>Estimated number of respondents</b>	<b>105</b>
<b>Total annual responses</b>	<b>105</b>
Estimated responses per respondent = 1	
<b>Total burden hours</b>	<b>420 hr</b>
Estimated hours per response = 4 hr	
<b>Total personnel cost (\$75/hr x 420)</b>	<b>\$31,500</b>
<b>Total miscellaneous costs ( Submittal Online)</b>	<b>0</b>

<b>Vessel Fuel Survey, Federal Government</b>	
<b>Total annual responses</b>	<b>105</b>
<b>Total burden hours</b>	<b>420 hr</b>
Estimated hours per response = 4 hr	
<b>Total personnel cost (\$75/hr x 420)</b>	<b>\$31,500</b>
<b>Total miscellaneous costs</b>	<b>0</b>

### c. Vessel Master Survey

The Vessel Master Survey is a qualitative assessment survey that poses a series of questions to elicit vessel operator input on factors that influenced the vessel’s performance during the year. The questions in this survey are primarily qualitative questions concerning operator on-grounds impressions and choices made during the pollock season, including incentives, fishing location choices, and salmon PSC reduction measures.

For any AFA-permitted vessel used to harvest pollock in the Bering Sea in the previous year:

- ◆ The vessel master must complete the Vessel Master Survey, and the Vessel Master certification following the instructions on the form, Part 1A.
- ◆ An owner or leaseholder must complete the Vessel owner certification following instructions on the form, Part 1B.
- ◆ An owner or leaseholder must submit all Vessel Master Surveys, Parts 1A and 1B, electronically on or before 1700, A.l.t., on June 1 following the instructions on the form.

Many masters may compile notes in-season to be used for response to the specific survey at year-end. The burden associated with tracking activity will vary depending on the circumstances encountered during the year. Fully completing the form at the end of the season is estimated to require approximately 4 hours of in-season time, recording impressions of conditions and decision making.

The respondents would annually complete the Vessel Master Survey at the end of the fishing year.

If a vessel did not participate in the Bering Sea pollock fishery during the reporting year, the vessel owner is required to submit only the Certification Page of a Vessel Master Survey.

The Vessel Master Survey is available through the Internet on the NMFS Alaska Region website at <http://alaskafisheries.noaa.gov/sustainablefisheries/bycatch/salmon/chinook/edr/default.htm> or by contacting NMFS at (206) 526-6414.

## Vessel Master Survey

### Part 1A: Vessel Owner Certification Page

#### AFA-permitted vessel and owner identification

Vessel owner or leaseholder name and NMFS ID

Vessel name

AFA permit number

Vessel master name and CFEC gear operator permit number (repeat if more than one master)

#### Submittal of Vessel Master Survey

Select one of the following statements

You were the AFA owner or leaseholder for an AFA permitted vessel **that harvested or processed AFA pollock** during the calendar year

Complete and submit **ENTIRE Vessel Master Survey** Form (both Part 1 and Part 2)

You were the AFA owner or leaseholder for an AFA permitted vessel **that did not harvest or process AFA pollock** during the calendar year

Complete and submit the **Vessel Owner Certification Page** (Part 1)

#### Person Submitting this Report

Name and title or NMFS ID

Business Number Telephone, Business FAX Number, and Business E-mail address

#### Certification

Signature of owner or leaseholder of an AFA-permitted vessel and date signed

### Part 2: Pollock Fishing and Salmon Bycatch Avoidance

#### Hired Master Certification

Vessel master name and CFEC gear operator permit number

Signature of vessel master

Date signed

Provide complete answers. Where applicable, note any differences between the A and B pollock seasons

**Attach** extra sheets if more space is needed to complete your answers.

If the vessel participated in an Incentive Plan Agreement (IPA), did the IPA affect your fishing strategy?

**IF YES**, describe and discuss what incentives had the largest impact on your strategy.

Did the amount and/or cost of Chinook Salmon PSC allocation available to the vessel lead you to make changes in pollock fishing operations?

**IF YES**, describe.

How would you compare the Chinook salmon bycatch and pollock conditions during the A and B seasons this year relative to the last two years?

Describe any unique aspects of the season.

Did Chinook salmon bycatch conditions cause you to delay the start of your pollock fishing or otherwise alter the timing of your pollock fishing for some period during the past A and/or B season?

**IF YES**, describe the Chinook salmon bycatch condition, when it occurred, and any change in your pollock fishing as a result.

In the past year, did you end a trip and return to port early because of Chinook salmon bycatch conditions?

**IF YES**, indicate the number of trips that this occurred in each season (use a check to mark the appropriate answer for each season).

Describe how any area closures or restrictions for the purpose of reducing Chinook salmon bycatch affected where and how you fished.

Describe how any regulatory or other area closures or restrictions for a purpose other than reducing Chinook salmon bycatch affected where and how you fished.

Compared to a typical year, did weather or sea ice conditions have more, less, or about the same impact on fishing as in a typical year

**IF YES**, describe especially if there were particularly uncommon conditions at any point this year. If these conditions had an impact on your ability to avoid Chinook salmon bycatch, describe.

Were there exceptional factors that affected your pollock fishing this year? For example, were there unusual market or stock conditions, unusual pollock fishing conditions, or maintenance problems?

**IF YES**, describe.

Separate from an Incentive Plan Agreement, were there other incentives for you to reduce Chinook salmon bycatch? **IF YES**, describe.

Did actual or potential bycatch of species other than Chinook salmon cause you to change your harvesting decisions during the pollock season? **IF YES**, describe.

Changed number of respondents from 185 to 133. Change fax cost from \$5 to \$6. Changed postage from .44 to .45. Change Government response from 8 hr to 4 hr.

<b>Vessel Master Survey, Respondent</b>	
<b>Estimated number of respondents</b>	<b>133</b>
<b>Total annual responses</b>	<b>133</b>
Estimated responses per respondent = 1	
<b>Total burden hours</b>	<b>532 hr</b>
Estimated hours per response = 4 hr	
<b>Total personnel cost (\$75/hr x 532)</b>	<b>\$39,900</b>
<b>Total miscellaneous costs (Submittal Online)</b>	<b>0</b>

<b>Vessel Master Survey, Federal Government</b>	
<b>Total annual responses</b>	<b>133</b>
<b>Total burden hours</b>	<b>532 hr</b>
Estimated hours per response = 4 hr	
<b>Total personnel cost (\$75/hr x 532)</b>	<b>\$39,900</b>
<b>Total miscellaneous costs</b>	<b>0</b>

#### **d. Verification/Audit of Chinook Salmon EDR Data**

NMFS and Pacific States have developed measures to verify data submitted in the Chinook Salmon in-season compensated transfer report (CTR), Vessel Master Survey, and the Vessel Fuel Survey. The principal means to verify data and resolve questions is through validation of data submitted in these three surveys against supporting records. The person submitting the EDR must respond within 20 days of NMFS's information request. Responses after 20 days could be considered untimely and could result in a violation and enforcement action.

For CTR verification, a NMFS-approved auditor may review and request copies of additional data provided by the owner or leaseholder, including but not limited to: previously audited or reviewed financial statements, worksheets, tax returns, invoices, receipts, and other original documents substantiating the data. The NMFS-approved auditor will verify records by comparing specific elements of the report with participant accounting records.

To make the verification process as efficient and non-intrusive as possible, NMFS suggests that participants:

- ◆ Keep copies of all certification pages and completed EDRs, with all attachments, submitted to the Pacific States.
- ◆ Keep a file that has all of the supporting information used in the preparation of the EDR.
- ◆ Make sure that the EDR agrees with the company's highest level of financial information. For this purpose, the highest level of financial information is defined in order as:
  - Audited financial statements

- Reviewed financial statements
- Compiled financial statements
- Tax returns.

◆ Record only whole numbers. Round up dollar figures to the next highest dollar.

Changed number of respondents from 200 to 44.

<b>Chinook Salmon EDR Verification, Respondent</b>	
<b>Estimated number of respondents</b>	<b>44</b>
<b>Total annual responses</b>	<b>44</b>
Estimated responses per respondent = 1	
<b>Total burden hours</b>	<b>176 hr</b>
Estimated hours per response = 4 hr	
<b>Total personnel cost</b> (\$75/hr x 176)	<b>\$13,200</b>
<b>Total miscellaneous costs</b>	<b>\$4,631</b>
Photocopy (\$.05 x 5 pp x 44 = \$11)	
Telephone calls (\$5 x 44 = \$220)	
Accountant fee to verify EDR (\$100 x 44 = \$4,400)	

<b>Chinook Salmon EDR Verification, Federal Government</b>	
<b>Total annual responses</b>	<b>0</b>
<b>Total burden hours</b>	<b>0</b>
<b>Total personnel cost</b>	<b>0</b>
<b>Total miscellaneous costs</b>	<b>0</b>

Information derived from the collected data will be disseminated to the public consistent with applicable requirements for nondisclosure of confidential information or used to support publicly disseminated information. NOAA Fisheries 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 Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and 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.**

This collection is 95 percent electronic; except for the verification process, these reports are submitted online.

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

None of the information collected as part of this information collection duplicates other collections. This information collection is part of a specialized and technical program that is not like any other.

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

This collection applies only to those entities that participate in the AFA directed pollock trawl fishery in the Bering Sea. The only small entities that are directly regulated by this action are the six CDQ organizations, and the impact is not significant.

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

Chinook salmon caught in the pollock fishery are considered PSC under the Magnuson-Stevens Act, the FMP, and NMFS regulations at 50 CFR part 679. National Standard 9 of the Magnuson-Stevens Act requires the Council to select, and NMFS to implement, conservation and management measures that, to the extent practicable, minimize bycatch and bycatch mortality.

The Compensated Transfer Report (CTR) in conjunction with data from IPA reports provides information on the number and characteristics of Chinook salmon PSC transfers. Without this data, NMFS will not be able to tell how vessels differ from each other in terms of efficient use of Chinook salmon PSC or of the costs of avoiding Chinook salmon PSC. Without this data, it will not be possible to determine if the tradable Chinook salmon PSC is working or if it is not working, how to fix it.

Without the Vessel Master Survey, we will not understand the tradeoffs vessel masters made to avoid Chinook salmon. NMFS may not be able to detect if there are some essential pieces of information missing in other survey or report data that are needed to evaluate the effect of the IPAs in Amendment 91

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

No special circumstances exist.

**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 September 23, 2014 (79 FR 56775) solicited public comments. No comments were received.

In addition, a questionnaire was distributed by email soliciting comments from 20 randomly selected participants. Five respondents completed and returned the questionnaire. Two addresses were returned as invalid.

A summary of the comments received from the survey follows.

Summary of Survey Comments, OMB 0648-0633 – Expiration Date 03/31/2015

**Note: The 2014 Council Summary of the 2012 EDR mentioned in some of the responses below is posted as a supplementary document.**

<a href="#">Vessel Master Survey</a> ◀ <a href="#">View</a>	
<p><b>1. Are the requirements for this survey easy to understand?</b>  <b>Comment:</b> Masters frequently lack context to understand why they are being asked these questions. Moreover, in some questions masters lack awareness of owners’ decisions and so report erroneous information (e.g., one question asks if timing of fishing participation is affected by salmon bycatch – a master may be unaware of an owners’ decision to tie up the boat due to salmon bycatch and simply shows up at the dock when the owner tells him to do so). We need to brief masters ahead of time on the purpose and need for the EDR so that answers have value to the economists. Otherwise, masters are confused, annoyed, and write simple non-responsive answers in order to be done with it.  <b>Response:</b> According to the 2014 Council Update Report, “A small number of respondents voiced frustration with either having to describe their fishing experience or thought the questions were obvious”. It is likely that others felt the same way. Going forward, we will further evaluate the questions and discuss whether questions can be combined or re-ordered to elicit better responses. As several years of data are gathered and common responses are identified, some multiple choice questions may be created that would make it easier for respondents to complete and analysts to utilize. . . . The Council would be asked for input on any proposed changes that we believe would improve the survey. The survey for the 2013 fishing season is currently available online. Data can be entered beginning in April and must be completed by June 1, 2014. For the second year of the survey, the questions will be identical to those in Year 1. Starting the following year, changes could be made to make the survey easier to complete which would reduce burden and hopefully elicit better information.”</p>	<p>4Y 0N</p>
<p><b>2. We estimate it takes 4 hours for your office personnel to complete this survey. Is this time accurate and reasonable?</b>  <b>Comment:</b> If captains have the information readily available the survey can be completed fairly quickly  <b>Response:</b> NMFS acknowledges this comment.  <b>Comment:</b> This is a reasonable estimate for each vessel master. If a company has more than one vessel or more than one master per vessel, the amount of time should be multiplied by the number of vessel masters.  <b>Response:</b> NMFS acknowledges this comment.  <b>Comment:</b> The vessel captains fill these out and they estimate about an hour  <b>Response:</b> NMFS accepts this comment, but no change to the analysis will be made.</p>	<p>3Y 2N</p>
<p><b>3. We estimate that personnel costs to complete and submit the survey are \$75/hour. Is this cost accurate and reasonable?</b>  <b>Comment:</b> Many vessel masters complete the survey using uncompensated time, however they are highly compensated employees and their time should be valued as such. Moreover, company personnel assisting masters should be included in this estimate. Look at the AFA Coop reports or IPA reports for reasonable estimates of office personnel costs.  <b>Response:</b> NMFS acknowledges this comment. The “personnel costs” shown in OMB Control No. 0648-0401 analysis for the IPA Annual Report are \$165 per hour; for the AFA Coop Report are \$75 per hour.</p>	<p>2Y 2N No comment</p>

<a href="#">Vessel Master Survey</a> ◀ <a href="#">View</a>	
<p><b>Comment:</b> Not applicable  <b>Response:</b> No response required.</p>	
<p><b>4. Do you believe that this survey has practical utility?</b>  <b>Comment:</b> The survey has utility that is limited by the attention given to the questions by the masters. Many masters pencil-whip the form to be done with it, and those answers are useless. When a master provides detailed observations, those are useful. However, the responses are limited by the questions asked, and many of the questions miss the key drivers – most importantly the opportunity costs of forgone fishing opportunities due to concerns re salmon bycatch.  <b>Response:</b> The 2014 Council Update Report asked the question -- Did respondents give useful and forthright answers? And answered the question as follows: “The responses to the survey appear to be useful and to provide insight into pollock fishing and salmon bycatch conditions. 2012 was a very low Chinook bycatch year, so there were not large numbers of vessels approaching their Chinook PSC allocations. We would expect the survey questions about years with higher Chinook PSC to provide more nuances and different explanations among vessels. We cannot tell if respondents are strategically responding to the survey, but there are a wide range of responses that provide useful information beyond any question of whether or not the IPAs and hard cap are changing behavior. It is unclear whether it is in respondent’s interests to voluntarily convey any information that is inconsistent with the Council’s stated objectives for the program.”  <b>Comment:</b> Would need to see results  <b>Response:</b> NMFS believes the commenter refers to how the data is used.</p>	<p>3N Y</p>
<p><b>5. Can you suggest ways to enhance the quality and clarity of the information to be collected?</b>  <b>Comment:</b> Collect salmon data on a seasonal basis. It can be difficult for captains to accurately remember trip by trip information from a year and a half ago.  <b>Response:</b> Data required for the Vessel Master Survey is generally qualitative and based on the opinion of an owner or vessel master. NMFS does not require that submitters record and retain additional logs or records to support the qualitative responses.  <b>Comment:</b> Economists should ask better questions. Perhaps they should collaborate with anthropologists or sociologists for help, as the information they seek is more complex than their assumptions would have it.  <b>Response:</b> NMFS disagrees. Subsequent to the Council's final action on the EDR program in 2009, industry representatives worked with AFSC economists, AKRO, and Council staff members to refine EDR survey forms, clarify instructions, and develop and improve the administrative process for implementing the annual data collection. An initial workshop was held at AFSC on June 21, 2010 to review the original drafts of the three Amendment 91 EDR forms and solicit input on any needed modifications. With minor revisions resulting from the workshop, the draft forms were reviewed by the Council in October 2010 and approved with some additional modifications to the Vessel Fuel Survey and Vessel Master Survey forms recommended by the Advisory Panel. Also see the 2014 Council Update Report.</p>	<p>2Y 0N 2No comment</p>
<p><b>6. Can you suggest ways to minimize the burden of completing this survey?</b>  <b>Comment:</b> Make your webpage more user friendly. The links often don’t work and the tokens can be difficult to use.  <b>Response:</b> NMFS and Pacific States Marine Fisheries Commission work continuously to</p>	<p>2Y 0N 2No comment</p>

<a href="#">Vessel Master Survey</a> ◀ <a href="#">View</a>	
<p>provide a user-friendly web site. Not knowing who Vessel Masters are ahead of the EDR collection requires the vessel owner/EDR submitter to provide that information by listing the Vessel Masters; and the system sends out email invitations. The Tokens in the email make sure the correct Vessel Master is completing a survey for the correct vessel as one master can potentially operate more than one A91 vessel a year.</p> <p><b>Comment:</b> If it's submitted electronically, save the data so we don't have redundant info and we can remember what it's about</p> <p><b>Response:</b> NMFS has considered this idea, to provide the respondent data given in the previous year with instructions to update the information. Completion of that project in the future is based on software development which depends on available talent and time. Probably within the next five years or so, it may become possible.</p>	
<p><b>7. What else would you care to tell us? Provide any additional comments on any aspect of the Chinook Salmon EDR Program.</b></p> <p><b>Comment:</b> I want to commend Brian Garber-Yonts in particular for his outreach efforts to industry to try to get better EDR reports.</p> <p><b>Response:</b> NMFS certainly agrees with commenter.</p>	<p>Y 3No comment</p>

<a href="#">Vessel Fuel Survey</a> ◀ <a href="#">View</a>	
<p><b>1. Are the requirements for this survey easy to understand?</b></p>	5Y
<p><b>2. We estimate it takes 4 hours for your office personnel to complete this survey. Is this time accurate and reasonable?</b></p> <p><b>Comment:</b> To plug in the numbers is easy. But if this information is not already compiled it would take well over 4 hours.</p> <p><b>Response:</b> NMFS acknowledges this comment.</p> <p><b>Comment:</b> takes maybe an hour</p> <p><b>Response:</b> NMFS acknowledges that the recordkeeping habits of each respondent varies.</p> <p><b>Comment:</b> If you keep good records, this is a quick answer</p> <p><b>Response:</b> NMFS acknowledges this comment.</p>	<p>0Y 4N</p>
<p><b>3. We estimate that personnel costs to complete and submit the survey are \$75/hour. Is this cost accurate and reasonable?</b></p> <p><b>Comment:</b> The data requested is easily gathered by personnel at this level of compensation.</p> <p><b>Response:</b> NMFS acknowledges this comment.</p> <p><b>Comment:</b> We don't charge for time</p> <p><b>Response:</b> No response needed.</p>	<p>3Y 2N</p>
<p><b>4. Do you believe that this survey has practical utility?</b></p> <p><b>Comment:</b> If you are trying to put a price tag on salmon avoidance this could give you a general idea but would not result in a highly accurate number. Fuel consumption rates are estimates during fishing and steaming.</p> <p><b>Response:</b> NMFS acknowledges this comment.</p> <p><b>Comment:</b> Within its limitations – it gathers useful information about transit expenses but does not answer questions about other factors affecting decisions to move (i.e. product form, fish concentrations, perceived bycatch risks of other areas, etc.)</p> <p><b>Response:</b> NMFS acknowledges this comment.</p>	<p>2Y 2N No comment</p>
<p><b>5. Can you suggest ways to enhance the quality and clarity of the information to be collected?</b></p> <p><b>Comment:</b> Adequate within its limitations</p> <p><b>Response:</b> No response needed.</p>	<p>2N 3No comment</p>
<p><b>6. Can you suggest ways to minimize the burden of completing this survey?</b></p>	0Y

<a href="#">Vessel Fuel Survey</a> ◀ <a href="#">View</a>	
<b>Note:</b> Although the commenter indicated he/she had suggestions, no comments were made.	3N No comment
<b>7. What else would you care to tell us? Provide any additional comments on any aspect of the Chinook Salmon EDR Program.</b>	0N 4No comment

<a href="#">Chinook PSC Allocation In-Season Compensated Transfer Report</a> ◀ <a href="#">View</a>	
<b>1. Are the requirements for this report easy to understand?</b> <b>Note:</b> 3 respondents do not use this report	2Y
<b>2. We estimate it takes 40 hours for your office personnel to complete this report. Is this time accurate and reasonable?</b> <b>Comment:</b> The Mothership Salmon Savings Incentive Plan (MSSIP) has had no compensated transfers. Thus, our time to complete this report is substantially less. Maybe two hours max to get it all done and make sure I don't mess it up. <b>Response:</b> No response is needed.	2N
<b>3. We estimate that personnel costs to complete and submit the report are \$75/hour. Is this cost accurate and reasonable?</b> <b>Comment:</b> See personnel costs for IPA Report submissions. <b>Response:</b> See response above	2N
<b>4. Do you believe that this report has practical utility?</b> <b>Comment:</b> It was explained to me by economists that their hope was to be able to calculate or infer a "spot price" for Chinook salmon PSC. The idea shows a profound lack of understanding of the dynamics of the fishery and an arrogant self-love of their own modeling techniques. My understanding is that some of these economists have woken up to the fact that the fishery is more complicated than their hoped-for spot price modeling, and I believe they are attempting more complex explanations (and of course, models) to reflect this revelation. <b>Response:</b> The 2014 Council Update Report discusses the benefits and challenges of the data collection during 2012 and 2013.	2N
<b>5. Can you suggest ways to enhance the quality and clarity of the information to be collected?</b> <b>Comment:</b> The economists should take their licks and admit a mistake. Get rid of this form and question. Go back to the drawing board and come up with better questions reflecting the complexity of the fishery dynamics. Abandon the mythical spot price assumption as being not reflective of fishery dynamics. <b>Response:</b> The purpose of 2014 Council Update Report was to update the Council on the status of the Amendment 91 Chinook Salmon EDR program and related data collection measures implemented in relation to Amendment 91 to the BSAI Groundfish FMP. The report includes the following: <ul style="list-style-type: none"> <li>• A review of the Council's objectives and process for the development and implementation of this data collection;</li> <li>• Summary of details regarding the administration of the 2012 Chinook EDR data;</li> <li>• A summary of empirical results from the 2012 Amendment 91 data collection;</li> <li>• A report on ongoing collaborative efforts between industry members and NMFS and Council staff to implement the EDR program, minimize EDR submitter burden, and ensure data quality standards and that the Council's stated objectives for the data collection program are met; and</li> <li>• A discussion of the benefits and challenges of the data collection during 2012 and 2013.</li> </ul>	0Y No comment
<b>6. Can you suggest ways to minimize the burden of completing this report?</b>	0Y

<a href="#">Chinook PSC Allocation In-Season Compensated Transfer Report</a> ◀ <a href="#">View</a>	
<b>Comment:</b> Eliminate it. <b>Response:</b> No response required.	No comment
<b>7. What else would you care to tell us? Provide any additional comments on any aspect of the Chinook Salmon EDR Program.</b>	2No comment

<a href="#">Verification/Audit of Chinook Salmon EDR Data</a>	
<b>1. Are the requirements for this verification process easy to understand?</b> <b>Note:</b> Two respondents do not do this process	3Y
<b>2. We estimate it takes 4 hours for your office personnel to respond to this verification. Is this time accurate and reasonable?</b> <b>Comment:</b> Audit information for the compensated transfer survey is simple. Although proof of fuel survey is time consuming and required extensive explanation <b>Response:</b> No response needed. <b>Comment:</b> 1 hour <b>Response:</b> No response needed.	3N
<b>3. We estimate that personnel costs to complete and submit the verification are \$75/hour. Is this cost accurate and reasonable?</b> <b>Comment:</b> no charge <b>Response:</b> No response needed.	0Y 2N
<b>4. We estimate that miscellaneous costs include \$5 to respond by telephone and \$100 or accountant fee to verify the EDR. Do you agree?</b>	2Y 0N
<b>5. Do you believe that this verification has practical utility?</b>	0Y 0N No comment
<b>6. Can you suggest ways to enhance the quality and clarity of the information to be verified?</b>	3No comment
<b>7. Can you suggest ways to minimize the burden of completing this verification?</b>	3No comment
<b>8. What else would you care to tell us? Provide any additional comments on any aspect of the Chinook Salmon EDR Program.</b>	3No comment

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

No payment or gift is provided under this program.

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

The data requested in the Chinook Salmon EDR includes detailed proprietary information provided by firms and individuals, as well as personally identifying information (PII) and business identifying information (BII). These data are considered confidential under section 402(b) of the Magnuson-Stevens Act. It is also confidential under [NOAA Administrative Order 216-100](#), which sets forth procedures to protect confidentiality of fishery statistics. The EDR data are prohibited from release to the public. Access to EDR data is tightly controlled under numerous provisions of statute, regulation, and administrative order.

The Code of Federal Regulations ([50 CFR 600.415](#)) specifies that access to confidential data collected by NMFS is restricted to

- ◆ Federal and Council employees responsible for collection and maintenance of the data, FMP development, monitoring or enforcement, or performing research that requires access to confidential statistics, or on a demonstrable need-to-know basis.
- ◆ NOAA/NMFS contractors or grantees who require access to confidential statistics to perform functions authorized by a Federal contract or grant.
- ◆ State personnel who demonstrate a need for confidential statistics for use in fishery conservation and management, provided that the State has entered an agreement to protect confidential data to a standard comparable to that required by the Magnuson-Stevens Act.

The regulations further provide for granting of access to Council members under conditions that are unlikely to be met in the case of these Chinook Salmon EDR data, and individual submitters may request that their own records be released to themselves or a third party.

In addition, the confidential proprietary data collected in this Chinook Salmon EDR meet the definition of trade secrets as defined in the [Freedom of Information Act](#) (5 U.S.C. 552) and [Trade Secrets Act](#) (18 U.S.C. 1905) (me insert hyperlinks), and as such is exempted from disclosure of raw, un-aggregated data under FOIA. All individuals who are determined to be authorized for access to confidential data are required to sign and submit a nondisclosure agreement, affirming the user's understanding of NMFS' obligations with respect to confidential data and the penalties for unauthorized use and disclosure. [NOAA Administrative Order 216-100](#) is the principal legal guidance for NMFS' employees on specific protocols for handling confidential data, including definitions, policies, operational responsibilities and procedures, penalties, and statutory authorities and requirements.

**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.**

This information collection does not involve information of a sensitive nature.

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

Estimated total respondents: 133, down from 200. Estimated total responses: 283, down from 694. Estimated total burden: 1,168, down from 9,976 hr. Estimated total personnel costs: \$87,600 down from \$748,200.

**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).**

Estimated total miscellaneous costs: \$4,631, down from \$25,958.

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

Estimated total responses: 239, down from 494. Estimated total burden: 962, down from 3,916 hr. Estimated total personnel cost: 72,150, down from \$293,700.

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

Adjustments were made to update the number of respondents, the use of online submission, and cost of personnel wages.

Compensated Transfer Report

- a decrease of 199 respondents and responses, 1 instead of 200
- a decrease of 7,960 hours burden, 40 instead of 8,000
- a decrease of \$597,000 personnel costs, \$3,000 instead of \$600,000
- a decrease of \$1,054 miscellaneous costs, 0 instead of \$1,054

Vessel Fuel Survey

- a decrease of 4 respondents and responses, 105 instead of 109
- a decrease of 16 hours burden, 420 instead of 436
- a decrease of \$1,200 personnel costs, \$31,500 instead of \$32,700
- a decrease of \$378 miscellaneous costs, 0 instead of \$378

Vessel Master Survey

- a decrease of 52 respondents and responses, 133 instead of 185
- a decrease of 208 hours burden, 532 instead of 740
- a decrease of \$15,600 personnel costs, \$39,900 instead of \$55,500
- a decrease of \$526 miscellaneous costs, 0 instead of \$526

Chinook EDR Verification

- a decrease of 156 respondents and responses, 44 instead of 200
- a decrease of 624 hours burden, 176 instead of 800
- a decrease of \$46,800 personnel costs, \$13,200 instead of \$60,000
- a decrease of \$19,369 miscellaneous costs, \$4,631 instead of \$24,000

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

The information collected will not be 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.**

Not Applicable.