

**SUPPORTING STATEMENT**  
**WEST COAST REGION VESSEL IDENTIFICATION REQUIREMENTS**  
**OMB CONTROL NO: 0648-0355**

**A. JUSTIFICATION**

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

This submission requests extension of Office of Management and Budget (OMB) approval for a vessel identification requirement in the Pacific Coast Groundfish Fishery. Due to a change of region name, this information collection is now titled West Coast Region Vessel Identification Requirements, rather than Northwest Region Vessel Identification Requirements.

The success of fisheries management programs depends significantly on regulatory compliance. The vessel identification requirement is essential to facilitate enforcement. The ability to link fishing or other activity to the vessel owner or operator is crucial to enforcement of regulations issued under the authority of the [Magnuson-Stevens Fishery Conservation and Management Act](#) (including provisions at 16 U.S.C. 1853).

Vessel identification is required by all open access and limited entry commercial vessels over 25 ft. in length in the West Coast region. Vessel identification requirements are set forth in the regulations implementing the Pacific Coast Groundfish Fisheries Management Plan at [50 CFR 660 Subpart C](#).

**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 vessel's official number must be displayed on the port and starboard sides of the deckhouse or hull, and on a weather deck. It identifies each vessel and should be visible from a distance at sea and in the air. The official number provides law enforcement personnel with a means to monitor fishing, at-sea processing, and other related activities, 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 U.S. Coast Guard (USCG), and other marine agencies in issuing violations, prosecutions, and other enforcement actions. Law enforcement personnel rely on this information to assure compliance with fisheries management regulations. Vessels that qualify for particular fisheries are readily identified and gear violations are more readily prosecuted, allowing for more cost-effective enforcement. Cooperating fishermen also use the number to report suspicious activities. Regulation-compliant fishermen ultimately benefit as unauthorized and illegal fishing is deterred and more burdensome regulations are avoided.

The information collected will not be disseminated to the public; as it consists solely of marking vessels with the appropriate vessel number. This information is not submitted to NMFS.

**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 technology. Vessel monitoring system (VMS) units are currently required on all groundfish vessels consistent with regulations at 50 CFR 660.14. Although VMS signals, which are transmitted hourly, can be used to identify a vessel's fishing location, it is difficult for enforcement personnel aboard vessels and aircraft to use to identify specific vessels. Therefore a vessel identification number requirement continues to be useful for basic enforcement.

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

Existing Federal and State reporting requirements have been reviewed to ascertain that no duplication of information collection results from this action. There is no duplication with other collections. The USCG requires the name of the vessel and hailing port to be marked on its stern for documented vessels (46 CFR 67) and state-issued block numbers on the forward half of the vessel for undocumented vessels (i.e., small boats that are registered with the state) (33 CFR 173); however vessel names, ports, and block numbers may be changed, making tracking and identification of the vessel more difficult and complex. The USCG also requires documented vessels to have their official identification number permanently marked on the vessel. However, this is usually done on an interior structural beam in the engine room. For efficient enforcement and accurate reporting, an identifying number is required on the outside of the vessel in large numbers by the NMFS because a vessel's identification number does not change.

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

Although nearly all vessels in the respective fisheries are categorized as small businesses, the collection of information will not have a significant economic impact or burden on small businesses in terms of time and resources. Therefore, no special modifications of the requirements were considered necessary.

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

The NMFS and the USCG could not enforce the fisheries management measures if this collection were conducted less frequently. The numbers must periodically be maintained to remain legible.

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

This collection is consistent with the guidelines.

**8. Provide a copy of 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 was published on December 17, 2014 (79 FR 75129). No comments were received.

NMFS Sustainable Fisheries Division (SFD) staff contacted fishing participants and representatives from various groundfish fishery sectors during the fall of 2014 to determine the duration of annual burden estimates for vessel requirements. Fishing participants from various gear types were contacted to provide input to NMFS staff, which contributed to NMFS staff assumptions, and helped to refine the estimates provided in this PRA renewal. Captains and vessel owners contacted included participants in the Dungeness crab fishery, a sablefish limited entry longline vessel captain, a bottom and non-whiting midwater trawl vessel owner/captain, and a at-sea whiting catcher-processor. All representatives stated that vessel markings last an average of five years.

Consultation outside the agency is assured by the Pacific Coast Groundfish regulatory process, set forth in the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations (Pacific Coast Groundfish Fishery Management Plan and 50 CFR 660, Subpart G). There are no issues that have not already been resolved.

**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.**

No confidentiality is promised. The information is on public display.

**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 1,125 vessels (334 limited entry vessels and 781 open access vessels). This number is an overestimate because it includes vessels under 25 feet, and limited entry permits that may be stacked on the same vessel. The identifying number must be displayed on the vessel in three locations and maintained in good condition. Given the adverse weather conditions and salt water, previous estimates assumed that each number would need to be repainted or repaired annually. However, SFD staff recently consulted with various groundfish vessel captains participating in various groundfish pot, longline, midwater trawl, bottom trawl fisheries, and determined that gear markings have a five-year life span. The estimated time to display or otherwise affix the number at each location is 15 minutes. Estimated burden of total annual response time: 1,125 vessels x 3 marking locations x 15 minutes = 843.75 (844) hours, **with responses annualized to 225 and hours annualized to 169.**

Labor costs in the fishing industry are estimated at \$18.79 per hour utilizing labor estimates provided via Washington State Employment Security Department reports ([fortress.wa.gov](http://fortress.wa.gov)) for occupation title "Painters, Construction, and Maintenance."

Total fleet cost: \$15,994, annualized over 5 years is \$3,199.

**13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

The cost to fishermen is minimal. Materials needed are paint and paintbrush, and possibly a stencil. Material costs are estimated as follows: 1 quart of exterior paint = \$14.95, 1 paintbrush = \$2.00, 1 small container of mineral spirits (cleaning) = \$4.45 (total \$21.40). A paint-on number stencil is optional, and optional custom printed stick-on numbers = \$120 (set of 3). Given the higher cost for the stick-on option, these vessel marking estimates provided assume that vessel captains would not choose the stick-on marking option. For 1,125 vessels, the cost would be \$24,075, and **annualized over 5 years, would be \$4,815.**

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

None.

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

Adjustment: Based on current permit numbers and estimates of 2013 participation and vessel landings, there are fewer respondents, decreased from 1,663 to 1,125. Also, estimated materials costs per vessel have decreased from \$35 to \$21.40. In addition, previous NMFS estimates expected each vessel number would need to be repainted or repaired annually (one-year life span) However, recent estimates gathered from consultation with fishing vessel captains representing various gear types (pot, longline, bottom trawl, midwater trawl, at-sea processors) indicate vessel markings to have a five-year lifespan, reducing estimates of annualized burden to 69, and materials cost to \$4,815.

**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 te certification statement.**

There are no exceptions.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection does not employ statistical methods.

Note: Totals shown here are 5-year totals.

Table 1	Limited Entry				Open Access*	Fleet Totals
	Trawl	Mothership	Fixed Gear	Pot		
Total number of vessels	137	5	177	25	781	1,125
Number of markings per vessel	3 markings					
Total number of markings	411	15	531	75	2343	3,375
Estimated time per vessel to display or affix the number at each location	15 minutes					
Estimated time per vessel to display or affix all required markings	45 minutes					
Total burden hours all vessels	102.75	3.75	132.75	18.75	585.75	843.75
Cost per vessel for materials**	\$21.40 per vessel					
Total cost for materials	\$2,932	\$107.00	\$3,787.80	\$535.00	\$16,713	\$24,075
Cost per hour for labor, cost per Marking***	\$18.79, \$14.09					
Total cost for labor	\$1,930.33	\$70.45	\$2,637	\$352.25	\$11,004.29	15,994.32
*Open Access numbers estimated using 2013 PacFin landings data for vessels with unique vessel identification numbers. All other sector values estimated using 2014 permit information.		**Material costs are estimated as follows: 1 quart of exterior paint = \$14.95, 1 paintbrush = \$2.00, 1 small container of mineral spirits (cleaning) = \$4.45 (total \$21.40).				
***Labor estimates provided via Washington State Employment Security Department reports (fortress.wa.gov) for occupation title "painters, Construction, and Maintenance"						
Notes: Annual burden estimates (hours, total = hours + materials) assume markings need to be re-painted every five years on average, with an annualized total cost of \$4,185. Number of respondents is assumed to be equal to the number of vessels						

**§ 660.20 Vessel and gear identification.**

(a) Vessel identification

(1) Display. The operator of a vessel that is over 25 ft (7.6 m) in length and is engaged in commercial fishing for groundfish must display the vessel's official number on the port and starboard sides of the deckhouse or hull, and on a weather deck so as to be visible from above. The number must contrast with the background and be in block Arabic numerals at least 18 inches (45.7 cm) high for vessels over 65 ft (19.8 m) long and at least 10 inches (25.4 cm) high for vessels between 25 and 65 ft (7.6 and 19.8 m) in length. The length of a vessel for purposes of this section is the length set forth in USCG records or in state records, if no USCG record exists.

(2) Maintenance of numbers. The operator of a vessel engaged in commercial fishing for groundfish must keep the identifying markings required by paragraph (a)(1) of this section clearly legible and in good repair, and must ensure that no part of the vessel, its rigging, or its fishing gear obstructs the view of the official number from an enforcement vessel or aircraft.

(3) Commercial passenger vessels. This section does not apply to vessels carrying fishing parties on a per-capita basis or by charter.

(b) Gear identification. Gear identification requirements specific to fisheries using fixed gear (limited entry and open access) are described at §660.219, subpart E and §660.319, subpart F.