SUPPORTING STATEMENT WEST COAST REGION U.S. PACIFIC HIGHLY MIGRATORY SPECIES HOOK AND LINE LOGBOOK OMB CONTROL NO. 0648-0223

A. JUSTIFICATION

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

This request is for extension of a current information collection.

The United States (U.S.) is a major consumer of Pacific highly migratory species (HMS). Assessments of the status of HMS stocks and the monitoring of both the foreign and domestic fisheries are vital to U.S. fishermen, consumers and producers. Data collected through a recordkeeping and reporting program are essential to assess the status of these stocks by providing abundance indices and locations of catches. The ability to collect fishing information or other vessel activities is crucial to fisheries management under the authority of the Magnuson Fishery Conservation and Management Act (Magnuson-Stevens Act), HMS Fishery Management Plan (FMP), as well as a High Seas Fishing Compliance Act (HSFCA; 16 U.S.C. 5501 et seq.). The HSFCA authorizes a system of permitting U.S. fishing vessels that operate on the high seas (beyond the Exclusive Economic Zone) and establish management measures which includes maintaining a complete record of fishing activities.

Under the FMP and 50 CFR 660.707-708, West Coast Region (WCR) fishing vessels are required to obtain a permit and provide logbook information on daily fishing activity, including catches, effort and position. These data and associated analyses help the Southwest Fisheries Science Center (Center) provide the needed management advice to the U.S. in its negotiations with foreign fishing nations exploiting Pacific HMS. These data have been collected since the early 1960s and future collections will ensure a complete series of data for monitoring analysis purposes.

2. Explain how, by whom, how frequently, and for what purpose the information will be used.

Logbook data will be collected throughout the year and submitted within 30 days of the end of each fishing trip. The collected information is used by the National Marine Fisheries Service (NMFS) to assess the status of HMS stocks and monitor the fisheries. Data on catches and catch locations are used to determine population size, abundance levels and data on vessel characteristics are used to standardize fishing effort and for economic analyses. After data are standardized, catch and effort information are used to determine year class strength, fishing mortality, maximum sustainable yields and descriptive information on where and how many fish are caught.

Environmental data are used to correlate catches with certain environmental conditions in an effort to predict locations of favorable catches.

The information is stored on computer databases and analyzed through standard population dynamics models. Results of these analyses will show the condition of the stock and, if the stocks are under-exploited, will indicate where increased catches can be made or, in the case where the stocks are over-exploited, can be used to determine quotas, area closures or other methods to enhance stock recovery. This information will be used by U.S. negotiators in international and domestic forums to develop policy related to the continued harvesting of Pacific HMS. These data will also be summarized yearly and provided to the fishermen for their use.

Hook and Line Logbook (*formally Albacore Logbook*; change request approved 3/31/2017): In the early 1970s, the collection of the data was contracted through the Pacific States Marine Fisheries Commission (Commission). The Commission then decided to collect the data through a uniform logbook system and developed a predecessor to the current logbook. This logbook is focused on hook and line gear (troll, pole & line, and rod & reel). Fishermen record the amount of target catch species (albacore, yellowfin, and bluefin tunas) caught, incidental catch and any bycatch. In addition, information on fishing trip dates, fishing area, and landing ports is collected. Completed logbook pages are sent to the Center for analysis of the fishery.

Currently, WCR charter vessels logbooks are issued by the states of California and Washington with the exception of Oregon. Oregon recreational charter vessels are requested to use the Hook and Line logbook to meet logbook requirements.

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. 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 subjected to quality control measures and a pre-dissemination review pursuant to Section 515 of Public Law 106-554.

3. <u>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.</u>

The logbook is distributed in paper form and will be available as an electronic logbook prior to the 2018 albacore fishing season (June - July). When ready, fishermen will be encouraged to use the electronic logbook. The West Coast Region's web site at http://www.westcoast.fisheries.noaa.gov/fisheries/migratory_species/highly_migratory_species_logbooks.html, is used to inform the public about WCR logbooks and provides a means for fishermen to request logbooks and download electronic forms.

4. Describe efforts to identify duplication.

No other collection of these data exists that fulfils the reporting obligations of the HMS FMP.

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

Most HMS vessel owners are small business entities. Federal logbooks are similar to actual logs that vessels would keep as standard records. Fishermen have been an integral part of both the development and modification of the forms and sampling program to minimize burden. The current data collection system and forms are continuously updated to be the least burdensome.

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

Collections of logbook data are required for HMS permit holders. Cancellation or decrease in coverage will hinder management of these permit programs and allocation of quotas in the future.

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

The collection is 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 <u>Federal Register</u> Notice published on October 24, 2017 (FR 82 49182) solicited public comment on this renewal. None were received.

NMFS asked for comments from Pacific Highly Migratory Species Permit holders. 39 public comments were received in response to this request: 28 were "no comment" and 11 were comments regarding the requirement to complete and submit a logbook (all had been asked the same list of questions from the FRN).

Comments included suggestions to create a quicker and simpler process for submitting logbooks and reduce the physical size. In addition, there were concerns that logbooks duplicate information which can be obtained through fish tickets. Lastly, suggestions included the adoption of an electronic logbook form.

In a recent revision of the Hook and Line Logbook (formally Albacore Logbook), several data columns were removed, which reduced the information collected. The change helped to improve the ability to adapt the paper logbook to an electronic version. This revision also reduced the amount of information needed to complete the form and the physical size of the logbook,

allowing for easier storage on vessels. New logbooks were distributed to active hook and line fishermen that submitted logbooks from 2016-2017.

There are several data fields that are collected through logbooks and fish tickets (i.e. species, gear types, weight). Although this duplicate information exists, there is still a need for information that Federal logbooks provide such fishing area beyond California, Oregon, and Washington state waters, and bycatch. Hence, there is a need to continue both collections simultaneously.

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

No payments or gifts are made to respondents.

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

As stated on the form, per <u>NOAA Administrative Order 216-100</u>, data are considered confidential and can only be distributed in summary form so as not to reveal the operations of a unique vessel. This practice is consistent with the <u>Trade Secrets Act</u>.

There is also a Privacy Act Statement on the HMS Web site.

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

No information of a sexual, religious or other private nature is collected.

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

Approximately 1,700 logbooks will be distributed to HMS permit holders. As logbook completion is required in order to maintain the applicable permits, the response rate should be 100%. Each respondent is estimated to make on average 4 trips a year, for a total of 6,800 responses. The burden is approximately 1 hour per response (it should be noted that data supplied would be recorded by the captain for their own use and carbons are kept for the vessels records).

The burden estimate for logbook submission is derived as follows:

1,700 HMS permit holders

One response per permit holder x 4 trips a year = 6,800 responses 6,800 responses x 1 hour per response = 6,800 burden 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).

Mailing costs are estimated to average \$0.50 per submission (one or more logbook pages), for a total of \$3,400. There are no other costs.

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

The total annualized cost to the government is estimated at \$71,350.

This is based on the approximate cost of a ZP II Interval Technician in the San Diego Area for collecting and analyzing logbook data = \$45,850.

Printing costs: $$15 \log book \times 1,700 = $25,500.$

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

Adjustments: There is an increase in respondents to 1700 from 1000, using an average number of HMS permit holders over the last three years. The previous sponsor had not updated the respondent numbers, so they were six years out of date this year and have been adjusted accordingly.

The average cost per mailing was recalculated at \$0.50. Thus although costs increased based on accurate counting of responses, they did not increase proportionally.

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

Annual reports are distributed to Pacific Regional fisheries management organizations and the public.

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

Not Applicable.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.