

SUPPORTING STATEMENT
Washington and Oregon Charter Vessel Survey
OMB CONTROL NO. 0648-xxxx

A. JUSTIFICATION

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

Fisheries economic data collection programs implemented by 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 fishing vessels, 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).

The charter fishing industry has a long history in Washington and Oregon, as residents and tourists have come to experience a myriad of fishing opportunities, from salmon fishing in the Puget Sound and the Columbia River area to tuna fishing and rockfish fishing opportunities throughout both states. Charter fishing is a notable component of tourism along the Washington and Oregon coasts. In 2015, charter patrons in Washington and Oregon generated sales impacts of approximately \$83 million and value-added impacts in the form of wages, salaries, and profits of \$46 million¹.

A prior study of the Washington and Oregon charter fleet (approved under the then existing 0648-0369 generic clearance), with the same survey instrument, was completed in 2014 and collected cost earnings data pertaining to 2012 (Leonard 2016). Since then, the industry has faced a variety of difficult circumstances. Several salmon fisheries were found to meet the definition of disasters under Section 312(a) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), including the 2016 Washington State coho troll fishery, 2016 Klamath River Yurok Tribe fishery, 2015 South Puget Sound Chinook, coho, and chum salmon Nisqually Indian Tribe fishery. The prior survey, which collected data from 2012, revealed that with respect to business revenue, salmon remains the primary target of marine charter businesses in Washington and Oregon. Additionally, in Washington, where salmon charter licenses are distinguishable from non-salmon licenses, there are twice as many salmon licenses as non-salmon licenses. Given the macroeconomic changes in the past 5 years and the regulatory changes, particularly for salmon, there is a need for a collection of economic cost and earnings data and related social data on the Washington and Oregon charter fleet to support the fishery management process.

Timely costs and earnings data are needed in order to estimate the fishery's contribution to the state and local economies. IMPLAN sector (cost and earnings) data from Washington and Oregon charter vessels are required in the estimation of the Input Output Model for Pacific Coast Fisheries (IO-PAC), which is used to provide statutorily required estimates to the Pacific Fishery

¹ NOAA – Fisheries Economics of the United States 2015.

Management Council (PFMC) for fisheries under Fishery Management Plans (FMPs) administered on the West Coast.

2. 1 Explain how, by whom, how frequently, and for what purpose the information will be used. 1 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.

NMFS needs to measure the economic performance of Washington and Oregon charter operations in order to meet legal and regulatory requirements, support fisheries management decision making, and pursue more detailed economic research. Currently, the cost earnings data used to meet these needs are six years old. This study will collect data that is needed to construct key economic performance measures related to profitability, productivity, economic impacts, and social aspects of the fishery.

The data gathered and performance measures constructed will be used to address a wide range of issues important to the West Coast Regional Office, Pacific Fishery Management Council, and the Washington and Oregon charter fleet. More specifically, these data will be used to estimate the economic contribution of the Washington and Oregon fleet and the income and employment impact of changes in environmental, economic, or management conditions on the on the Washington and Oregon charter fishery. At a minimum the IO-PAC model, which utilizes these data, is used by the PFMC to estimate the economic impacts of alternative management proposals biannually for the Pacific Coast Groundfish Harvest Specifications and annually for the Stock Assessment and Fishery Evaluation report for ocean salmon fisheries (Leonard and Watson 2011). However, the IO-PAC model is also used by the PFMC in numerous other prospective management changes that are expected to change recreational fishing effort.

Reporting of Survey Results

Survey results will be reported through a series of reports and project summaries prepared for the survey respondents, general fishing public, fisheries managers, and academics. It is anticipated that results will also be reported in the form of a technical memorandum of the Northwest Fisheries Science Center, academic publications, presentations at conferences, and public meetings. All reporting of survey results will conform to data confidentiality requirements. Qualified researchers with data access and confidentiality agreements will have access to raw data for performing future analyses, if requested.

Information Quality Guidelines and Confidentiality

It is anticipated that the information collected will be disseminated to the public or used to support publicly disseminated information. 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. NFMS will maintain the confidentiality of the information consistent with legal authorities available, including but not limited to the Privacy Act (5 U.S.C. Section 552a) and the Trade Secrets Act (18 U.S.C. Section 1905). In the event that the NWFSC receives a formal request for the information pursuant to

the Freedom of Information Act (FOIA) (5 U.S.C. Section 552) the NWFSC will protect confidentiality to the extent possible under the Exemption 4 of the FOIA.

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.

Before the IO-PAC model is used in the fishery management process, it (together with the data collected through the collection of information described herein), will be reviewed by the Scientific and Statistical Committee of the PFMC.

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 data collection does not involve the use of automated, mechanical or other technological techniques.

4. Describe efforts to identify duplication.

We reviewed the existing literature on recreational activities in the region and could not find any studies that imply our effort is duplicative of any work conducted within the six years since the last survey conducted by NWFSC. We also conferred with state officials in Washington and Oregon with responsibilities for managing recreational saltwater fishing, and they could not identify any existing or planned duplicative efforts.

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

Most of the business entities in this information collection request can be classified as small businesses. Our approach is not to send out questionnaires to be filled out by respondents. Rather, to increase efficiency and reduce the respondent's burden, we send out an information collection interviewer to the home or office of the business owner/operator. The information collection team works with the respondent to complete the information collection. When arranging information collection interviews, our approach is to discuss the types of information we will be asking for during the interview. This enables the respondent to prepare before the interview, gathering any important records or documents that might be needed by the team. For example, for the cost-and-earnings questions, financial records are needed.

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

As noted before, the survey will collect information needed to develop economic models of recreational saltwater fishing in Washington and Oregon. This research will provide scientific support for management agencies such as the Pacific Fisheries Management Council, as well as the Washington Department of Fish and Wildlife, and the Oregon Department of Fish and

Wildlife. Not conducting the information collection will undercut the ability to estimate the economic impacts and contributions of recreational fishing, thus limiting the ability of agencies to manage fisheries consistent with federal and state law.

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

This is 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 April 10, 2018 (83 FR 15373) solicited public comments. No comments were received. We have also consulted with personnel at the Departments of Fish and Wildlife in Washington and Oregon regarding the data we are collecting. Personnel were given copies of the survey, a description of the purpose and intended use of the data, and copies of the report derived from the nearly identical 2012 charter data collection. Both agencies supported the data collection, supplied the confidential charter-owner contact information that the states maintain, and did not suggest any changes to the survey.

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

There will not be any payment or gift to respondents.

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

The survey states that the NWFSC will maintain the confidentiality of the information consistent with legal authorities available to the NWFSC, including but not limited to the Privacy Act (5 U.S.C. Section 552a) and the Trade Secrets Act (18 U.S.C. Section 1905). In the event that the NWFSC receives a formal request for the information pursuant to the Freedom of Information Act (FOIA) (5 U.S.C. Section 552) the NWFSC will protect confidentiality to the extent possible under the Exemption 4 of the FOIA.

The information to be collected is covered by [COMMERCE/NOAA-6](#), Fishermen's Statistical Data.

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.

No questions will be asked of survey participants about sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private.

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

We estimate the total burden of this data collection to be 179 hours. The survey will be conducted in two phases: an initial telephone screen of all license holders, and a follow-up full survey for those license holders who indicated that they actively engaged in charter fishing in saltwater in 2017. Burden estimates were calculated by multiplying the estimated time to complete each contact by the number of estimated contacts of each type. Specifically, we estimate that it will require 5 minutes to complete the initial telephone screen and an additional 60 minutes for those who complete the full survey for active saltwater charters. We expect 320 responses to the initial telephone screen and 152 full survey respondents.

We estimate an overall 55% response rate. For more detail, see the response to B1.

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).

There are no costs excluding the value of the burden hours in Question 12.

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

The survey is being administered by an outside contractor. The costs to the federal government are limited to the cost of the contract, which is estimated to total \$50,000, plus an estimated 60 hours from one NOAA economist. Although the economist will be employed full time by the federal government with or without this project, these hours would be diverted to other valuable tasks in the absence of this data collection. We use hourly loaded wage rates, including salary and benefits, to estimate this opportunity cost, these hours amount to \$5,292 related to this data collection.

Therefore, the total estimated annual costs incurred by the federal government as a result of implementing this survey are \$55,292.

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

This is a new program.

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

The most significant result of this collection will be providing needed data for use in other economic models as described in question 1 above. However, it is anticipated that the methodology and results of the data collection will be published in a NOAA technical memorandum. Tabulations of responses will be aggregated in order to maintain sufficient confidentiality, as described in the answer to question A2, above.

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.

This is not applicable, as we are not seeking such an approval.

18. Explain each exception to the certification statement.

This is not applicable, as we are not seeking such an exception.