

SUPPORTING STATEMENT
West Coast Limited Entry Groundfish Fixed Gear Economic Data Collection
OMB CONTROL NO. 0648-xxxx

A. JUSTIFICATION

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

Commercial fisheries economic data collections implemented by the Northwest Fisheries Science Center (NWFSC) have contributed 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).

Surveys implemented by the NWFSC since 2005 have covered West Coast harvesters, processors, and coastal communities. These surveys have focused on the federally managed groundfish and salmon fisheries as well as the closely related crab and shrimp fisheries. This document describes a data collection covering catcher vessels operating with a limited entry (LE) groundfish permit that has a fixed gear (longline and/or pot) endorsement.¹ During 2017 there were 164 vessels active on the West Coast that held a federal groundfish LE permit with a fixed gear endorsement.

This survey will collect data for the 2016 and 2017 fiscal years through in-person interviews, telephone interviews, and mail responses. Based on previous economic data collection from this population in 2006, 2009, 2011, and 2014, the NWFSC expects most survey respondents to respond through an in-person interview. Past surveys were conducted under OMB control number 0648-0369.

Data from this survey will be used to develop a variety of economic models covering applications such as fleet efficiency, fishery participation, and community economic impacts of fishing in the form of income and employment. 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 Management Council (PFMC) for fisheries under Fishery Management Plans (FMPs) administered on the West Coast.

Data collected by this survey is needed not only to monitor the performance of the LE fixed gear fishery, but also to determine if the implementation of catch shares management in the groundfish trawl fishery has had an economic effect on participants in the limited entry groundfish fixed gear fishery.²

¹ Vessels landing fish with a limited entry permit having a trawl endorsement are subject to a mandatory data collection program approved in OMB 0648-0618.

² Sablefish is a major source of revenue for participants in both the groundfish trawl fishery and the limited entry fixed gear fishery. With the implementation of catch share management in the groundfish trawl fishery during 2011, participants in that fishery can use trawl quota to harvest sablefish with fixed gear. As a result, there is reason to be concerned about the impact of the catch shares management regime in the groundfish trawl fishery on participants in

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 the limited entry fixed gear fleet in order to meet legal and regulatory requirements, support fisheries management decision making, and pursue more detailed economic research. 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. Currently, the cost earnings data used to meet these needs are six years old.

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 WA, OR, and CA state fish and wildlife agencies. At a minimum the IO-PAC model (Leonard and Watson, 2011), 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. However, the IO-PAC model is also used by the PFMC in numerous other prospective management changes that are expected to change commercial fishing effort. It has been applied in several peer-reviewed studies (Kaplan and Leonard 2012; Seung et al. 2014; Leonard and Steiner 2017; Richerson et al. 2018; Hodgson et al. 2018).

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. When writing final reports and publishing the findings of this research, tabulations of individual responses will occur at a high enough level of aggregation so that no single individual may be identified. 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. NMFS 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. This data collection, subject to funding, could potentially be completed using this OMB control number for a future collection survey within the three-year clearance period.

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

the limited entry fixed gear fishery.

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, spoke with PFMC staff and NMFS Western Regional Office who maintains the contact information for LE permit holders. We could not find any indication that our effort is duplicative of any work conducted within the six years since the last survey conducted by NWFSC.

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 to estimate fleet efficiency, fishery participation, and community economic impacts of fishing in the form of income and employment. This research will provide scientific support for management agencies such as the Pacific Fisheries Management Council, NMFS western regional office, state agencies, and the general public. Not conducting the information collection will undercut the ability to fulfill legally mandated analyses of the effects of fishery management changes.

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 Federal Register / Vol. 83, No. 76 / April 19, 2018 solicited public comments. No comments were received.

This collection would be the fifth time the NWFSC has conducted an economic cost earnings survey of the limited entry fixed gear fleet. Over this time, extensive discussions have been held with members of the limited entry fleet in an on-going effort to clarify questions included in the collection.

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 cover letter and survey contains the following privacy act statement.

“We appreciate the confidential nature of the data being collected by this survey. 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 Exemption 4 of the FOIA.”

This information is covered by a Privacy Act System of Records [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 annual burden of this data collection to be 270 hours. Burden estimates were

calculated by multiplying the estimated time to complete each contact by the number of estimated contacts. Specifically, we estimate that it will require three hours to complete the survey, and we expect 90 responses.

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 \$70,000, 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 \$75,292.

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 10, 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.

