

**SUPPORTING STATEMENT
WEST COAST REGION GROUND FISH TRAWL LOGBOOK
OMB CONTROL NO: 0648-XXXX**

A. JUSTIFICATION

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

This request is for a new collection.

The success of fisheries management programs depends significantly on the availability of fishery data. Currently, the states of Washington, Oregon, and California administer a trawl logbook on behalf of the Pacific Fishery Management Council (Council) and NOAA's National Marine Fisheries Service (NMFS). The log used is a standard format developed by the Council to collect information necessary to effectively manage the fishery on a coast-wide basis. The trawl logbook collects haul-level effort data including tow time, tow location, depth of catch, net type, target strategy, and estimated pounds of fish retained per tow. Each trawl log represents a single fishing trip.

The state of California repealed their requirement, effective July 1, 2019, therefore, NMFS must create a federal requirement in order to not lose logbook coverage from trawl vessels in California. This federal requirement duplicates the logbook structure and process that the state of California was using in order to minimize disruption or confusion for fishery participants. Under this rule, NMFS will contract with the Pacific States Marine Fisheries Commission (PSMFC) to distribute and collect the same logbook these fishermen have been using previously. These data are used regularly by NMFS, the Pacific Fishery Management Council, the West Coast Groundfish Observer Program, NMFS Office of Law Enforcement, and the Coast Guard for fisheries management and enforcement.

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.

The data collected from the logbook are used regularly by NMFS, the Pacific Fishery Management Council, the West Coast Groundfish Observer Program, NMFS Office of Law Enforcement, and the Coast Guard for fisheries management and enforcement. The data provide vital effort and location data on fishing, and in combination with landings data provide the main data source for fisheries monitoring, management, and enforcement. It is anticipated that the information collected will be disseminated to the public 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 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. 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 of information relies on the completion of paper forms. The logbook structure and process will be the same that the state of California was using in order to minimize disruption or confusion for fishery participants. NMFS is exploring whether logbooks could be scanned and emailed rather than submitted via paper, and if this option is feasible in the future, will make this an option for respondents. The question of fully electronic logbooks has been explored in the past and due to the need for logbooks to be completed while at-sea, the burden of requiring vessels to have computer and satellite equipment in order to complete electronic logbooks was determined to be insurmountable. If in the future, this option becomes more available to vessels, NMFS would explore this submission option as well.

4. Describe efforts to identify duplication.

As noted above, this requirement would be replacing what was a state-level requirement for California. Because Oregon and Washington are maintaining their logbook programs, this new information collection would only apply to California trawl fishermen.

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 result a meaningful change in the way in which they have been collecting and submitting this information for many years. Trawl fishermen have been required since the 1980s to collect and submit this data to their respective state. This new information collection would replace the requirement in California, but by utilizing the same form and mimicking the same procedure, any new burden on fishermen should be minimized.

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

If this collection was not conducted or was conducted less frequently, NMFS, the Council, and the Coast Guard would lose vital coverage in California from a coast-wide trawl fleet. Without the data from this information collection, there would be no haul-level effort data from trawl vessels off of California, which would severely compromise monitoring, management, and enforcement of this fishery. In 2017, the most recent year of data available, there were 5,475 hauls by trawl vessels in California, and a total of 13,075. Without logbook data from California, NMFS and its management partners would lose haul data from almost 42% of the total coast-wide hauls.

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

By requiring monthly reporting, this collection would require more frequent submission than the OMB guideline of quarterly reporting. Monthly reporting is necessary in order to obtain data in a timely enough manner through which in-season management adjustments could be made. Landings data for this fishery are collected immediately, and the logbook data that would be

collected under this collection are used to corroborate landings data as needed. Therefore, in order to maintain some of the primary utility of this logbook, NMFS must require monthly submissions. This collection is consistent with all other OMB 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 published on March 5, 2019 (84 FR 7890) solicited public comment. One comment was received, from the Nature Conservancy. This comment expressed support for the collection of logbook data and its importance in the management process. Additionally, the comment offered recommendations on how to design the logbook. The specific recommendations were: to include fields for discarded and retained species to better integrate in future electronic monitoring of the fishery, and allow for electronic submission. NMFS has considered these recommendations and notes that the future implementation of electronic monitoring will revisit the logbook requirement for the vessels that choose to use that monitoring type. Additionally, NMFS is not pursuing electronic submission of the logbook at this time, beyond simple transmission of digital photos of logbooks, due to high cost for respondents. In the future, if costs of electronic submission (i.e. vessels equipping themselves with computers in order to relay data) were to become practicable for the fleet, NMFS will revisit this decision.

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

No payments or gifts are provided to respondents.

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

All logbook data is subject to confidentiality under the Magnuson Stevens Act section 402(b) as amended in 2006 (16 U.S.C. 1801, et seq.).

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 is no information of a sensitive nature in this collection.

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

The estimated potential total number of vessels affected is 21: this is the number of trawl vessels that have fished off of California in recent years. This would be the maximum number of respondents, and the real number would likely be less because a portion of trawl vessels off of California participate under an exempted fishing permit (EFP) for the use of electronic monitoring, and these vessels must complete logbooks under the terms of that permit. Therefore,

the only vessels affected by this information collection are those operating off of California that are not participating in the electronic monitoring program. However, because vessels may opt in and out of the EFP throughout the fishing year, 21 respondents is an appropriate upper bound. Each vessel must submit logbooks from each trip on a monthly basis. While each vessel may not trawl fish each month, a maximum upper bound of 12 submissions a year is a good upper bound. Therefore the estimated amount of annual responses is 252.

Each logbook requires data on each haul a vessel makes. On average, a trawl vessel will make 6 hauls per trip. Several of the questions on the logbook are for basic information such as what the location of the vessel and net is for the haul; this information is assumed to be readily available from the vessel's equipment. The rest of the information for each haul is on how much of each species is retained. It is estimated that collecting and then recording data for each haul takes about 60 minutes because it requires the sorting of all the catch from the net. Therefore, on average, it would take a vessel 6 hours to complete each logbook, and at an average of 3 trips a month (so 3 logbooks a month), 18 hours a month, and an annual estimate of 216 hours.

21 Respondents x 12 responses/year = 252 annual responses

$$\frac{1 \text{ Logbook}}{6 \text{ Hauls}} \times \frac{6 \text{ Hauls}}{1 \text{ Trip}} = 1 \text{ Logbook per Trip}$$

$$\frac{1 \text{ Logbook}}{60 \text{ Minutes}} \times \frac{360 \text{ Minutes (6 hrs)}}{1 \text{ Logbook}} \times \frac{1 \text{ Logbook}}{1 \text{ Trip}} = 6 \text{ Hours per Trip}$$

$$\frac{6 \text{ Hours}}{1 \text{ Trip}} \times \frac{3 \text{ Trips}}{1 \text{ Month}} = \frac{18 \text{ hours per month}}{(1 \text{ response})}$$

$$18 \text{ hours} \times 12 \text{ response} = 216 \text{ hours}$$

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 total annual cost burden is offset by NMFS and the PSMFC providing both the forms and pre-addressed envelopes in which to return the forms. Therefore, the only cost burden to respondents would be to photocopy the forms in order to retain records of the logbooks. These photocopies are estimated to have an annual cost burden of \$63 for all respondents, or \$3 per respondent.

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

The logbooks will be entered into the database by PSMFC staff. Each logbook takes on average 15 minutes to enter. Therefore, an annual count of 252 logbooks would take staff, on average, 63 hours to enter into the database. At a rate of \$37 an hour, this data entry would result in \$2,331 in annual costs. Additionally, because NMFS and the PSMFC would provide pre-stamped envelopes to the vessels to submit the logbooks, there would be an additional \$324 cost to the government.

$$\$2,331 + \$324 = \$2,655$$

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.

No results are published as a regular procedure. However, the information collected are used to inform fishery management and may be published in analyses, to the extent allowable under confidentiality rules.

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.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.

Trawl Logbook, Respondent	
Number of respondents	21
Total annual responses	252
Frequency of response = 12	
Total burden hours	
Time per response = 60 minutes	216 hr
Total personnel cost (\$37/hr x 216)	\$7,992
Total miscellaneous costs	\$63
Photocopy (1pp x .25 x 252 = \$63)	

Trawl Logbook, Federal Government	
Number of responses	252
Total burden hours	63 hr
Time per response = 15 min	
Total personnel costs (\$37/hr x 81)	\$2,331
Total miscellaneous costs	\$252
Postage (1pp x 1.00 x 252)	