

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**Cost-Earnings Survey of Mariana Archipelago Small Boat Fleet**  
**OMB Control No. 0648-0755**

**Abstract**

The National Marine Fisheries Service (NMFS) proposes to collect information about fishing expenses and catch distribution (the share of fish that is sold, retained for home consumption, directed to customary exchange, etc.) for the Mariana Archipelago small boat-based reef fish, bottomfish, and pelagics fisheries with which to conduct economic analyses that will improve fishery management in those fisheries; satisfy NMFS' legal mandates; and quantify achievement of the performance measures in the NMFS Strategic Operating Plans. The data collected will be used to assess how fishermen will be impacted by and respond to regulations likely to be considered by fishery managers. Respondents will include small boat fishers across the Mariana Archipelago (Guam and the Commonwealth of the Northern Mariana Islands) and their participation in the economic data collection will be voluntary. The information collection is an extension, without change, of a currently approved collection.

**Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The National Oceanic and Atmospheric Administration's (NOAA) National Marine Fisheries Service (NMFS) needs the economic data included in this information collection to be capable of more than a cursory effort to comply with or support the following laws, Executive Orders (EOs) and NOAA Fisheries strategies and policies, which require economic analyses<sup>1</sup>.

1. The Magnuson-Stevens Fishery Conservation and Management Act (MSA)
2. The Marine Mammal Protection Act (MMPA)
3. The Endangered Species Act (ESA)
4. The National Environmental Policy Act (NEPA)
5. The Regulatory Flexibility Act (RFA)
6. EO 12866 (Regulatory Planning and Review)
7. EO 13771 (Reducing Regulation and Controlling Regulatory Costs)
8. EO 13840 (Ocean Policy to Advance the Economic, Security, and Environmental Interests of the United States).
9. The NOAA Fisheries Guidelines for Economic Reviews of Regulatory Actions
10. The NOAA Fisheries Strategic Plan 2019-2022 (Strategic Plan)
11. The NOAA Fisheries Ecosystem-Based Fishery Management (EBFM) Road Map
12. The NOAA Fisheries National Bycatch Reduction Strategy

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<sup>1</sup> Appendix A discusses their requirements for economic data and analyses.

### 13. NOAA's Catch Share Policy.

The Magnuson-Stevens Conservation and Management Act (MSA) mandates that conservation and management measures prevent over-fishing and obtain an optimum yield on a sustained basis and the measures shall be based upon the best scientific information available. National Standard 8 of the MSA requires that conservation and management measures take into account the importance of fishery resources to fishing communities in order to: (a) provide for the sustained participation of such communities, and (b) to the extent practicable, minimize adverse economic impacts on such communities. To promote better utilization and management of fishery resources in the Mariana Archipelago (Guam and the Commonwealth of the Northern Mariana Islands (CNMI)), the NMFS proposes the collection of cost-earnings data in these island areas' boat-based reef fish, bottomfish, and pelagic fisheries.

The chief domestic fishery activity in Guam and the CNMI uses a small boat and a 1 to 2-day fishing trip that targets a variety of pelagic and near shore species. The fisheries are important to the local community in terms of a source of fresh local protein and have deep roots in the island culture. The fisheries land approximately 4 pounds of fresh fish per capita in Guam and 13 pounds of fresh fish per capita in CNMI annually. Fishing activities are usually a mix of quasi-commercial and non-commercial fishing, with slightly more than half of the fish landed being commercial landings and the rest are non-commercial landings (mostly for subsistence use). Given the importance of the small-boat fisheries to Guam and the CNMI's communities and economies, it is critical to monitor changes among key economic indicators through economic data collection.

Fisheries in Guam and the CNMI are managed under the Western Pacific Region Fishery Management Council (WPRFMC). The paucity of economic data has been a significant hurdle in evaluation of economic impacts and regulatory proposals in Guam and the CNMI. Most of the existing economic information is limited to dockside value data. Although the Pacific Island Fisheries Science Center (PIFSC) has continuous fishing expenses data collection in these areas, the information collected is limited to fuel cost, cost of ice used, cost of bait & chum used, and cost of fishing gear lost (OMB Control No: 0648-0635). The most recent update on the cost-earnings study in the Marianas Archipelago small boat fleet (under this current OMB Control No: 0648-0755) was conducted in 2018/2019 based on 2017/2018 operations (report not out yet). And the most recent publications for the small boat fisheries in the Marianas were documented in Hospital and Beavers (2012<sup>2</sup>, 2014<sup>3</sup>), with the fieldwork conducted in 2011 based on the 2010 operation. This research has become dated and is inadequate to support current management actions. One recent related recommendation was stated in the "WPRFMC Five-year Research Priorities Under The MSRA 2020-2024" (November 2019), focusing specifically on addressing socioeconomic characterization of regional fisheries, markets, and fishing communities:

HC1.1.9 Design and implement socioeconomic surveys with consideration for how results could support regional comparisons and understanding of trends in fishery and ecosystem knowledge,

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2 Hospital, J., and C. Beavers. 2012. *Economic and Social Characteristics of Guam's Small Boat Fisheries*. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Serv., NOAA, Honolulu, HI 96822-2396. Pacific Islands Fish. Sci. Cent. Admin. Rep. H-12-06, 60 p. + Appendices.

3 Hospital, J., and C. Beavers. 2014. *Economic and Social Characteristics of Small Boat Fishing in the Commonwealth of the Northern Mariana Islands*. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Serv., NOAA, Honolulu, HI 96818-5007. Pacific Islands Fish. Sci. Cent. Admin. Rep. H-14-02, 58 p. + Appendices.

attitude, and perceptions.

Since the WPRFMC recommended socioeconomic surveys to better understand and incorporate economic and social science into fishery management, and the small boat fisheries in Guam and the CNMI are under the jurisdiction of the WPRFMC, we are proposing to conduct a cost-earnings study of small boat fisheries in Guam and the CNMI in 2024 based on 2023 operation. The objectives of this study are to update the cost-earnings economic information for these small boat fleets (previous survey: 2018/2019 Marianas cost-earnings survey, OMB control #0648-0755), and to explore important social and behavioral aspects of these fisheries that will be important to document for consideration in any potential future management actions. The information collected will be used to: 1) satisfy regulatory objectives and analytical requirements through the collection of economic data for these fleets, 2) assist the WPRFMC in selecting policies that meet conservation and management goals and minimize to the extent possible any adverse economic impacts to fishery participants, and 3) support the Commercial Fisheries Economic Assessment Index (CFEAI) and Recreational Fisheries Economic Assessment Index (RFEAI) funded by NMFS nation-wide to collect necessary and timely economic data.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

NMFS and the WPRFMC will use this information to monitor, explain and predict changes in the economic performance and impacts of small boat fishing in Guam and the CNMI. The information collected will provide valuable cost-earnings data and related information on social conditions for Guam and the CNMI small boat fisheries. This will increase their ability to meet the requirements for economic analyses and to allow better-informed conservation and management decisions on the use of living marine resources and marine habitat in federally managed fisheries. In addition, the information will partially fill the data gap set forth in the Commercial Fisheries Economic Assessment Index (CFEAI) by NMFS Science & Technology. CFEAI is comprised of several elements: operating cost data are collected and net trip revenues are estimated at least every three years; and fixed cost data are collected and profitability are estimated at least every five years. The survey seeks to collect fishing-related expenditures such as operating costs and fixed costs as primary data, and also the value of fish sold on an annual basis. Net trip revenue and profit can be estimated by revenue minus costs. Net revenue is a key factor for commercial fishers to determine whether they stay or leave the fishing industry; therefore, it is a very important indicator of the dynamics of fishing effort in the short run and fishing industry development in the long run. It can be used to examine any significant short-term economic impact from conservation and management measures. In addition, the cost-earnings data will allow NMFS economists to analyze the relationship between fishing effort and cost and predict potential changes in fishing effort due to external changes like fuel cost changes and fishery management actions. The study will provide timely economic information for various stakeholders, including fishermen, fishery managers, researchers, and the general public.

In this project, we will use the survey form that was used in the previous cost-earnings studies of the Guam and CNMI small boat fisheries, with some minor changes for ease of economic data comparison over time. The minor changes are to better reflect the small boat fisheries in Guam and the CNMI, to improve survey language, to make it consistent with other cost-earnings

surveys in the Pacific islands regions, and by NMFS request to incorporate potential future productivity analyses. The data will be collected through a voluntary, in-person survey methodology with small boat fishers in Guam and the CNMI. The proposed questionnaire has seven sections: 1) fishing experiences, 2) market participation, 3) vessel characteristics, 4) fishing trip cost, 5) annual fishing expenditures, 6) basic demographics, and 7) opinions about fisheries management.

The first section inquires about the fisher's fishing experience in the past year, including number of boat and non-boat trips, gear usage, length of boat fishing trips, number of people on board, boat ramp usage, pounds of fish caught, and the use of Fish Aggregating Devices. This information is essential to understand fisher's distribution of fishing effort and trip characteristics over the year, as the region currently lacks any mandated fisher reporting systems.

The second section asks about fisher's market participation and social aspects of fishing. Questions about market participation include market outlets used, fishing income, and ability to sell different types of fish. Questions related to social aspects of fishing include catch disposition between markets and other uses (such as home consumption and community distribution), self-identification of fisherman type, fishing roles in the past year (e.g. fish for a vendor, dealer, or as an independent fisherman, and whether they fish as a captain or crew), and importance of catch as a source of food for family. This section will provide valuable data to satisfy the MSA requirements as the MSA requires fishery management council to take into account fishers' historical and present participation, dependence on fisheries, and culture values relevant to the fisheries and any affected fishing communities when developing management plans.

The third section inquires the captain about the vessel characteristics like the vessel's length, horsepower, year built, and year purchased. It also asks the vessel value that includes purchase price, market value, and year of last major vessel improvements. This information can be used to estimate the economic depreciation, a significant portion of fixed costs.

Section four asks the fishing trip costs for the most common and the second most common gear type and the trip cost distribution. This will provide the variable costs during the operation of vessels which include boat fuel, truck fuel, oil, ice, bait, food and beverage, daily maintenance and repair, gear lost, and others. The information collected in this section will be used to estimate the operating costs and net trip revenues.

Section five collects annual fishing expenditures, i.e. the fixed costs incurred regardless of the number of trips taken in a year like insurance, loan payment, financial services, mooring fees, repair, maintenance, and improvements for vessel, engines, or trailer, oil and lube, gear, electronics, fees, safety equipment, etc. The information collected in this section will be used to estimate the fixed costs and profitability on an annual basis.

Section six inquires about fisher's demographic characteristics. These include information about the fisher's gender, age, village lived in, years in Marianas, years of boat fishing, ethnicity, employment, education level, household income, and fishing club affiliation. These data will provide information on social and cultural characteristics of people participating in the fishing communities, critical to Social Impact Assessments associated with fishery regulations.

The last section asks about fishers' beliefs on the future of their fisheries, key target species, and fisheries management priorities. It also gives an opportunity for fishers to voice their opinions about the management of fisheries. The results will be grouped into categories and shared with the WPRFMC.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction. See response to Question 10 of this Supporting Statement on information confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Although the information collected is not expected to be disseminated directly to the public, results may be used in scientific, management, technical or general informational publications. A report summarizing the aggregated and main results will be available online once the data collection and analysis are completed. Prior to dissemination, the information will be subject 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 collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The proposed data collection does not involve the use of any of the above information technology techniques. The data collection will be conducted through a voluntary, in-person survey methodology because no existing contact information or permitting systems are available for most of the active fishers and in-person surveys in the past have received high response rates and support from the fishing community.

We do plan to make a copy of the cost-earnings survey of Mariana Archipelago small boat fleet available online for outreach and information purposes.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.**

We have contacted local fishery agencies: Guam Department of Agriculture's Division of Aquatic and Wildlife Resources (DAWR), and CNMI government Department of Lands and Natural Resources' Division of Fish & Wildlife (DFW) to inquire about their upcoming data collection efforts; none of them have planned data collection initiatives dealing with fishing expenses, fishing income, and other socioeconomic aspects of boat-based fisheries in the upcoming years.

A literature review was conducted to find studies that collect boat-based cost-earnings data in the Marianas and literatures on this topic are all outdated (see response in Question 1 for past studies). Although PIFSC started implementing a longitudinal survey to collect fishing trip cost data in Guam and the CNMI in 2011 and 2009, respectively, it is restricted to a few basic fishing cost items like fuel cost, ice cost, cost of bait and chum, and cost of fishing gear lost (OMB

Control No: 0648-0635). This proposed information collection of cost-earnings data in the Marianas will allow us to evaluate fishers' net revenues/losses and provide an indicator of the economic health of the fisheries. Because small boat fishing in the Marianas also includes a large subsistence component, the information collected will also allow us to evaluate how the subsistence value of fishing offset any potential losses from commercial fishing operations. Since the last cost-earnings study of the Marianas small boat fleet was conducted in 2018/2019, we propose updating our knowledge of economic conditions of small boat fisheries in these areas in 2024 (based on 2023 operation) by renewing the previously approved cost-earnings survey of Mariana Archipelago small boat fleet.

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

Small boat fishing in Guam and the CNMI include owner or family-operated small businesses. To minimize burden, the survey will be conducted through in-person surveys at community meetings, and for those who are not able to attend the community meetings, interviews will be conducted at times and places that are convenient to fishers. This will minimize any potential disruption to fishers' fishing practices. Participation in the survey is completely voluntary. If a fisher does not want to participate, he/she can simply disregard the survey. In addition, we intend to follow the survey strategy that was successfully implemented and received high response rates in the Marianas during the Marianas Archipelago small boat cost-earnings survey conducted in 2011 (Hospital and Beavers, 2012, 2014) and 2018/2019. In-person surveys would be administered by a contracted outside vendor with good connections with the local fishing communities and considerable groundwork will be done within the community prior to the survey implementation to get a good understanding of fishery participation levels. The survey instrument for this study will be a slightly shorter version (5 fewer questions) than the one that was used in the cost-earnings study conducted in 2011 (Hospital and Beavers, 2012, 2014) to minimize burden. The drop in the number of questions are due to outdated socioeconomic issues, e.g. questions related to Marianas Trench Marine National Monument and impacts to fishing trips due to military exercises, and questions that were not essential to the socioeconomic aspects of the fisheries, e.g. number of hours in a fishing trip, seasonality for pelagic fish, bottomfish, and reef fish.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Not conducting this collection or conducting it less frequently would have the following adverse cascading effects. It would decrease the ability of NMFS and the WPRFMC to effectively monitor, explain and predict changes in the economic performance and impacts of federally managed commercial fisheries. That would prevent more than cursory efforts to comply with or support a variety of laws, Executive Orders and NOAA Fisheries strategies and policies, which require economic analyses. That would limit their use of a well-informed, science-based approach to the conservation and management of living marine resources and marine habitat in federally managed fisheries. There are no technical or legal obstacles to reducing the information collection burden.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection is voluntary. Therefore, it does not require respondents to: 1) report information to the agency; 2) prepare a written response; 3) submit any document; 4) retain any records; or 5) submit proprietary trade secret, or other confidential information. The agency has demonstrated that it has instituted procedures to protect the information confidentiality to the extent permitted by law. This information collection is in connection with a statistical survey that is designed to produce valid and reliable results that can be generalized to the universe of study. This information collection uses statistical data classifications that have been reviewed and approved by OMB. This information collection includes a pledge of confidentiality that is supported by disclosure and data security policies, which are consistent with the pledge and which do not unnecessarily impede sharing of data with other agencies for compatible confidential use. This information collection is consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A Federal Register Notice published on March 16, 2020 (85 FR 14885) solicited public comments. No comments were received.

We consulted two persons who have experience with the previous survey implementation in Marianas, to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, on the data elements to be recorded and on the accuracy of the burden estimates. These include Clayward Tam from the Pacific Islands Fisheries Group, an organization that assisted with the data collection in 2011 and 2018/2019, and Felix Reyes who

is the WPRFMC Guam Island Coordinator that helped to implement the survey in 2018/2019. Clayward Tam was interviewed by phone by Justin Hospital on March 20, 2020 and Felix Reyes responded by email on April 9, 2020. The table below records their specific responses.

	Responses from Clayward Tam	Responses from Felix Reyes
Q1. Do you think the economic data in the survey are readily available?	We [Pacific Islands Fisheries Group] assisted in collecting the data for the Marianas economic fishing survey in 2011 and 2018. The community received advanced notice of the survey and the type of information that would be asked, so most were able to complete the surveys rather easily. I don't think we can get this information from anywhere else.	Yes. When I did the surveys for Guam the interest by fishermen to participate was high and only had a couple of declines but that's due to the fishermen being busy prepping to go or just returned and want to go home.
Q2. For the frequency of collection, do you think it is adequate?	We did the surveys in 2011 and 2018 it seems like a reasonable time frame between surveys. A lot had changed over that time. I suppose if you did the survey again in 5 or so years that would make sense.	Yes. But I recommend 3-5 years.
Q3. Do you think the fishermen had clear instructions to answer the survey?	We didn't encounter any problems with the surveys. There was advance notice on the type of questions being asked and why. Also the results from the 2011 survey were shared so most people knew what to expect in 2018, and early summaries of the 2018 survey have been shared with the community. We used community members with fishing experience to do in-person interviews so I think it went well.	Yes. Nobody had any problems with the questions.
Q4. The estimated interviewing time per respondent is 45 minutes. Do you think it is reasonable? If not, what do you think is the actual interviewing time per respondent?	I think most of the interviews took less time - maybe 30 minutes or so, but 45 minutes is a reasonable estimate to work through the survey for some people who may take more time.	No. 45 minutes is too long (overestimate). I suggest 15-30 minutes. I found it much easier if I were to ask the questions and fill out the survey form. It makes the process go faster.
Q5. What do you think on the data elements to be recorded?	The information in the survey is very important to understand the fisheries and the fishing community. The surveys collected important information on fishing behavior, the costs of fishing, levels of fishing investment, and social and cultural importance of fisheries. We don't have this information from any other source from what I know. In fact, I don't think we have any other fishing data for the islands of Rota and Tinian. Economic questions are important for understanding how the	Yes. The information that can be derived from the survey is important for fisheries management, but also for the local community.



	fisheries are doing, but in these island communities the social and cultural questions are especially important because fishing is different than the mainland.	
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To address the comment that the estimated interviewing time per respondent to be 45 minutes is too long, we will make sure the interviewers will have proper training to get familiar with the questionnaire before conducting the interviews, so that the interviewing process will go faster.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

Survey respondents will be advised that any information provided will be considered private. The information collected will be kept as confidential in accordance with [NOAA Administrative Order 216-100](#), and Confidential Fisheries Statistics and section 402(b) of the MSA (16 U.S.C. 1801, *et seq.*). All individual surveys will be held by only a limited number of researchers at PIFSC who will enter or work with the data. After the data are entered in an electronic format, only these researchers will have password-protected access to the data. After data from the surveys have been entered into an electronic format, the hard copies will be kept in a locked cabinet. It is the Agency’s policy not to release personally and business identifiable data, other than in aggregate form, as the NMFS protects such data. Whenever data are requested by other users, the Agency will ensure that information identifying the pecuniary business activity of a particular individual is not identified. Only group averages or group totals will be presented in any reports, publications, or oral presentations of the study's results.

The information collected is covered by COMMERCE/NOAA Privacy Act System of Records 6, Fishermen’ Statistical Information.

We will follow PIFSC’s policy of data aggregation: Any fishery-wide aggregations of data shall include information from three or more individual vessels. Effort information, including just the presence of fishing, can be just as sensitive as the actual catch itself. All data analysis programs should include a procedure for calculating the number of vessels within the aggregate. Wherever possible, aggregations should be large enough to include more, rather than fewer, vessels.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to**

## **obtain their consent.**

One potentially sensitive question is household income. Household income can be an important indicator of household economic resiliency and can be an important factor to consider when evaluating regulatory alternatives. For example, all else being equal, a regulation that disproportionately affects low-income households may be less preferred than one that more widely distributes economic impacts. In addition, combining respondents' household income information with home address data can be used to construct an indicator on community economic resilience, which may be useful when analyzing economic impact on communities as required under National Standard 8 of the MSA [MSA Section 301(a)(8)]. The steps to be taken to increase the response rates for this question include: 1) providing a similar explanation of the use of that information to potential respondents, and 2) ensuring potential respondents that such information will be treated as confidential.

The other potentially sensitive question included in one or more of these information collections is race. Race can be used to identify vulnerable communities that could be impacted by regulatory alternatives and issues related to socio-cultural background, particularly in commercial fisheries with diverse backgrounds. Hence, race may be useful when analyzing economic impact on communities due to conservation and management measures as required under National Standard 8 of the MSA [MSA Section 301(a)(8)]. Information collections involving a question on race follow the OMB Standards for the Classification of Federal Data on Race and Ethnicity.

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

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.**

We estimate the annual number of respondents based on the estimated number of unique boats in 2018 and the average percent of estimated active vessels responded from the past two cost-earnings studies of Mariana Archipelago small boat fleet. Because this is a one time survey that will be conducted in 2024, the frequency of responses per participant is 1. We anticipate 198 cost-earnings surveys will be completed in 2024 (or 66 per year) and each survey is about 45

minutes. The total burden hours are estimated to be 149 for three years and the annualized burden hours is approximately 50. Using the average hourly wage for ‘Farming, Fishing, and Forestry Occupation’ in Guam in May 2019 (\$13.21),<sup>4</sup> the estimated annualized labor cost to respondents for the hour burden for the collection is \$654. Table 1 below shows the details.

Table 1. Annual Wage Burden Costs Per Year

Information Collection	Type of Respondent (Occupational Title)	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hrs / Response (d)	Total Annual Burden Hrs (e) = (c) x (d)	Hourly Wage Rate (for Type of Respondent) (f)	Total Annual Wage Burden Costs (g) = (e) x (f)
Mariana Archipelago Small Boat Fisheries	Farming, Fishing, and Forestry Occupation	66*	1	66	0.75	50	\$13.21	\$654
Totals				66		50		\$654

\*Using the past two studies’ average percent of estimated active vessels responded and the estimated number of active small boats in 2018 (question B1 below): 31% of 398 active vessels in Guam and 67% of 110 active vessels in CNMI. Total number of respondents is estimated to be 198 in 2024, or 66 per year across three years.

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).s**

There are no costs excluding the value of the burden hours in question A12 (Table 2).

Table 2. Annual Cost Burden to Respondents

Information Collection	# of Respondents/year (a)	Annual # of Responses / Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Cost Burden / Respondent (h)	Total Annual Cost Burden (i) = (c) x (h)
Mariana Archipelago Small Boat Fisheries	66	1	66	0	0
TOTALS	66		66		0

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

The survey will be administered by an outside contractor. The cost of the contract is estimated to be \$40,000 in 2024, or \$13,333 per year on an annualized basis. Another cost is from the project oversight by a NMFS economist, which is estimated to take 40 hours per year (1.92% of annual effort) from a ZP-4 NOAA economist. Although the NMFS economist will be employed full time by the federal government with or without this project, these hours would be diverted to

<sup>4</sup> See [https://www.bls.gov/oes/current/oes\\_gu.htm#45-0000](https://www.bls.gov/oes/current/oes_gu.htm#45-0000)

other valuable tasks in the absence of this data collection. Assuming annual salaries of \$140,146 and a 50% benefit load, these hours amount to \$4,043 annually for salary and benefits related to this data collection. Additional cost is the labor cost of one economist from the joint research institute in the amount of \$7,596 per year (loaded salary \$158,000 for 100 hours (i.e. 4.8% annual effort)) for database design and data entry, data processing and quality control, report writing, and brochure development. Therefore, the total estimated annual cost incurred by the federal government as a result of implementing this survey is \$24,972. Table 3 shows a detailed breakdown of the annualized costs to the Federal government.

Table 3. Annualized Cost to the Federal Government

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP-4 (x1)	\$210,219	1.92%		\$4,043
<b>Contractor Cost</b>					
Vendor for survey implementation	-	-	-	-	\$13,333
Economist from joint research institute	-	\$158,000	4.8%	-	\$7,596
Travel					\$0
Other Costs:					\$0
<b>TOTAL</b>				<b>\$0</b>	<b>\$24,972</b>

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

Burden hours are dropped due to lower number of respondents. Table 4 below shows the details.

Table 4. Program Changes or Adjustment

Information Collection	Respondents		Responses		Burden Hours		Reason for change or adjustment
	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	
Mariana Archipelago Small Boat Fisheries	66	93	66	93	50	70	Adjustment - the number of fishers decreased in recent years and therefore lower responses and burden hours
<b>Total for Collection</b>	<b>66</b>	<b>93</b>	<b>66</b>	<b>93</b>	<b>50</b>	<b>70</b>	
<b>Difference</b>	<b>-27</b>		<b>-27</b>		<b>-20</b>		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Mariana Archipelago Small Boat Fisheries	\$654	\$921	0	0	Adjustment - the number of fishers decreased in recent years and therefore lower responses and burden hours
<b>Total for Collection</b>	<b>\$654</b>	<b>\$921</b>	<b>0</b>	<b>0</b>	
<b>Difference</b>	<b>-\$267</b>		<b>0</b>		

**16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The data collection is expected to be implemented in the second half of 2024 until the end of 2024. A brochure summarizing the results will be developed for outreach and timely dissemination of survey results to the fishing community and fishery managers in mid-2025. We expect to complete the analysis of the data by the end of 2025. The results will be published as a PIFSC technical report in 2026 and it will be available on PIFSC website.

**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.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

**18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

**Certification Statement for Paperwork Reduction Act Submissions**

**On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).**

The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).

## FORMS

Information Collection (IC) (must match Q12 of Supporting Statement Part A)	Is this a New IC (Form) Y / N	CFR Citation for IC	Full Name of Associated Form(s) (must submit all forms with every ICR renewal / revision pkg)	Obligation to Respond: Mandatory / Voluntary / Required to Obtain or Retain Benefits (select one)	# of Sn Entiti Comple For
Mariana Archipelago Small Boat Fisheries	N		Cost-Earnings Survey of Mariana Archipelago Small Boat Fleet	Voluntary	66

