

SUPPORTING STATEMENT
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
U.S. Pacific Highly Migratory Species Hook and Line Logbook
OMB Control No. 0648-0223

Abstract

This request is for an extension of a current information collection. United States (U.S.) fishermen participating in the Pacific highly migratory species (HMS) fishery, are required to obtain a HMS Fishery Management Plan (FMP) permit. A requirement for the permit is to complete and submit logbooks documenting their daily fishing activities, including catch and effort for each fishing trip. Submissions must be made within 30 days of the completion of a trip. The information obtained is used by the agency to assess the status of Pacific HMS stocks and to monitor the fishery. The agency also provides an electronic alternative to the hard copy form. Use of this electronic logbook is voluntary.

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 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.

As of April 1, 2019, California logbook requirements were repealed by the California Fish and Game Commission for HMS fisheries drift gillnet and swordfish harpoon. As a result, the California commercial fishing fleet with HMS permits will no longer be able to obtain these logbooks to meet the Federal reporting requirements. NMFS developed Federal logbooks to replace the California logbooks to continue collecting important fishing information. In addition, NMFS developed a purse seine logbook for vessels smaller than 400 short tons (st) (362.8 metric tons (mt)) carrying capacity or less to provide a replacement for using the Pacific Tuna Fisheries Logbook (OMB control number 0648-0128) developed for vessels larger than 400 st carrying capacity. This logbook is designed to collect those data that better represent the smaller purse

seine fleet.

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.

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.

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](#).

Hook and Line Logbook: 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.

Drift Gillnet Logbook: California Department of Fish and Wildlife (CDWF) and the California Fish and Game Commission required that California Limited Entry Drift Gillnet permit holders complete and submit

a State Gill and Trammel Net Fishing Log which includes is required of large mesh drift gillnet permittees. To continue to collect necessary catch information, a Federal Drift Gillnet Logbook was designed to replace the information previously obtained from CDFW. Fishermen record fishing effort including the amount of target species (swordfish, common thresher sharks) caught, other species, 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.

Harpoon Logbook: CDWF and the California Fish and Game Commission required California Swordfish permittees to complete and submit a State Swordfish Harpoon Logbook. The Federal Harpoon Logbook will continue to record swordfish fishing effort including fishing trip dates, fishing area, landing ports, and the number and weight of the fish caught. Completed logbook pages are sent to the Center for analysis of the fishery.

Purse Seine Logbook: U.S. participation in the Inter-American Tropical Tuna Commission (IATTC) requires purse seine vessels who fish in the IATTC’s area of management responsibility to meet record keeping requirements using the Pacific Tuna Fisheries Logbook (OMB control number 0648-0148) developed for vessels 400 short tons (st) (362.8 metric tons (mt)) or more. In recent years purse seine fishing vessels less than 400 short tons (st) (362.8 metric tons (mt)) carrying capacity participating in the coastal pelagic species fishery have increase interest in also targeting HMS. To improve data collection from this small fleet, NMFS developed a logbook to better represent the reporting of fishing effort for these vessels. The Purse Seine Logbook will be used to report target species (Bluefin, skipjack, and yellowfin) caught, bycatch, fishing area, and landing ports. Completed logbook pages are sent to the Center for analysis of the fishery.

Table 1: Information Requirements and Needs and Uses of Information Collected

Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
1	Reporting and Recordkeeping	316 U.S.C. § 1801	50 CFR 660.708	NOAA 88-197	Used by the NMFS and NOAA Office of Law Enforcement to manage fisheries stocks and reporting compliance

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 logbooks are distributed in paper form and the hook and line logbook is available as an electronic logbook. Hook and Line Fishermen are encouraged to use the electronic logbook. The West Coast Region’s web site at <https://www.fisheries.noaa.gov/west-coast/sustainable-fisheries/west-coast-highly-migratory-species-logbooks>, 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. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2

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

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

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. 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.

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 would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

The collection is conducted in a manner that 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 January 11, 2021 (86 FR 1943) solicited public comment on this extension. NMFS additionally asked for comments from Pacific Highly Migratory Species Permit holders using the gear types included in this collection. 2 public comments from permit holders were received.

The first commenter expressed their concerns that “in recent years a lack of funding and personnel at the Southwest Fisheries Science Center has greatly impeded that entity’s ability to compile and analyze the information contained in the paper logbooks which most fishermen have available to them. The same underfunding has prevented the full development of electronic logbook reporting to replace paper logbooks and resolve the difficulties with not having data available on a timely basis for the needs of the fishery.” We agree with the commenter that we would like to implement electronic logbooks. We are currently working to transition from paper logbooks to electronic in some of our fisheries and we hope to have all fisheries that can transition do so in the next several years. In the meantime, paper logbooks are still necessary in order to maintain the data collection.

The second commenter did not include relevant suggestions to the collection of information. After evaluation, it was determined that the comment did not complement the method collection that was stated in the 60-day notice and was not used to make any modifications to this collection.

9. Explain any decision to provide any payment or gift 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 the 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.

As stated on the form, per [NOAA Administrative Order 216-100](#), 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 [Trade Secrets Act](#).

The information in this collection is not stored within a system of record.

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.

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

12. Provide estimates of the hour 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%. The amount of fillable sheets in each logbook exceeds the number of fishing trips in a season, anticipating a replacement time of two years and 850 respondents each year. Each respondent is estimated to make on average 4 trips a year, for a total of 3,400 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 / 2 years = 850 respondents
 850 respondents x 4 trips a year = 3,400 responses
 3,400 responses x 1 hour per response = 3,400 burden hours

Information Collection	Type of Respondent (e.g., 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)	Total Annual Wage Burden Costs (g) = (e) x (f)
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							(f)	
Logbooks	fishermen	850	4	3400	1	3400	\$24.06	\$81,804
Totals				3400		3400		\$81,804

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).

Mailing costs are estimated to be \$0.55 postage per submission, for a total of \$1,870. Each submission will contain 4 responses. There are no other costs.

3,400 responses x \$0.55 = \$1,870

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)
Logbooks	850	4	3400	\$0.55	\$1,870
TOTALS	850	4	3400	\$0.55	\$1,870

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.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	ZP II	\$49,884	%75		\$37,413
Other Federal Positions					
Contractor Cost					
Travel					
Other Costs:					
TOTAL					\$37,413

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

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	
Logbooks	850	1700	3400	6800	3400	6800	There are no changes or adjustments to the collection - correcting an administrative error made when the previous burden was entered into ROCIS and mistakenly doubled. The previous SSA submission contained the correct information.
Total for Collection	850	1700	3400	6800	3400	6800	
Difference	-850		-3400		-3400		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Logbooks	\$81,804	NA	1870	3400	Correcting previous administrative error made when the burden was entered into ROCIS. The previous SSA submission contained the correct information. The miscellaneous costs were updated to reflect current postage costs.
Total for Collection	\$81,804	NA	1870	3400	
Difference	\$81,804		-1530		

16. For collections of information whose results will be published, outline 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.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that 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."

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