

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Oceanic & Atmospheric Administration**  
**West Coast Groundfish Trawl Logbook**  
**OMB Control No. 0648-0782**

**Abstract**

This request is for extension of a currently approved 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 The state of California repealed their requirement, effective April 1, 2019, therefore, NMFS created a federal requirement in order to maintain logbook coverage from trawl vessels in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 contracts with the Pacific States Marine Fisheries Commission (PSMFC) to distribute and collect the same logbook these fishermen were 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.

**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 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 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.

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Enforcement, and the Coast Guard for fisheries management and enforcement.

**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.**

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 provides vital effort and location data on fishing and in combination with landings data provide the main data source for fisheries monitoring, management, and enforcement.

**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.**

This collection of information relies on the completion of paper 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**

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

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

Although nearly all vessels in the respective fisheries are categorized as small businesses, the collection of information does 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 information collection replaces 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 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.**

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 California, which would severely compromise monitoring, management, and enforcement of this fishery.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OBM guidelines.**

This collection is consistent with the 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 February 11, 2022 (87 FR 8000) solicited public comment. No comments were received.

Additionally, NMFS reached out to several anglers in an effort 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. No responses were received.

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

All logbook data is subject to NMFS confidentiality requirements.

**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.**

There is no information of a sensitive nature in this collection.

**12. Provide estimates of the hour burden of the collection of information.**

The estimated potential total number of vessels affected is 27. This is the number of trawl vessels that have fished off 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 California participates 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 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, 27 respondents is an appropriate upper bound. The median amount of trips per year for this pool of vessels was 7.5 (rounded to 8). A vessel must complete one logbook per trip; therefore, the estimate amount of logbooks per year per vessel is eight. In addition, the estimated amount of annual responses is 216.

Each logbook requires data on each haul a vessel makes. On average, a trawl vessel will make eight 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 8 hours to complete each logbook, for an annual estimate of 64 hours. Since vessels will be required to submit their logbooks monthly, this time burden would be estimated to be 8 hours per month roughly.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondents (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)
Trawl Logbook	Fisherpersons/Anglers	27	8	216	8	1,728	\$16.70	28,857.60
<b>Totals</b>				<b>216</b>		<b>1,728</b>		<b>\$28,857.60</b>

The Hourly wage rate used is for 45-0000, Farming, Fishing, and Forestry Occupations.from BLS. [https://www.bls.gov/oes/current/oes\\_nat.htm#45-0000](https://www.bls.gov/oes/current/oes_nat.htm#45-0000)

**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).**

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 \$3 per respondent.

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)
Trawl Logbook	27	8	216	\$3.00	\$648.00
<b>TOTALS</b>	<b>27</b>		<b>216</b>		<b>\$648.00</b>

**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 logbooks are entered into the database by PSMFC staff. Each logbook takes on average 15 minutes to enter. Therefore, an annual count of 216 logbooks would take staff, on average, 54 hours to enter into the database. At a rate of \$37 an hour, this data entry would result in \$1,998 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 \$216 cost to the government.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
Federal Oversight	GS 12 step 5	77,407	2.6%		1,998
Other Federal Positions					
Travel					
Other Costs:					216
<b>TOTAL</b>					<b>\$2,014</b>

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

There are no changes to the information collection since the last OMB approval.

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	
Trawl Logbook	27	21	216	252	1,728	216	Error in previous burden estimate, which only

							calculated the annual burden for one vessel, not all respondents. Increase in respondents and decrease in upper bound of submissions per year based on historical data
Total for Collection	27	21	216	252	1,728	216	
Difference	6		-36		1,512		

Information Collection	Labor Costs		Miscellaneous Costs		Reason for change or adjustment
	Current	Previous	Current	Previous	
Trawl Logbook	28,858	NA	648	63	Labor costs not previously calculated
Total for Collection	\$28,858	NA	648	63	
Difference		28,858		585	

**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.**

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 that display would be inappropriate.**

The expiration date will be displayed.

**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 [5CFR 1320.8\(b\)\(3\)](#).