SUPPORTING STATEMENT

U.S. Department of Commerce
National Oceanic & Atmospheric Administration
West Coast Groundfish Logbooks
OMB Control No. 0648-0782

Abstract

This request is for a revision and extension of a currently approved collection. The revision to this collection is to merge the federally mandated logbook requirement for non-trawl groundfish fisheries that occur in the exclusive economic zone off the coasts of Washington, Oregon, and California (0648-0804) into this control number. Once cleared by OMB, control number 0648-0804 will be discontinued.

The success of fisheries management programs depends significantly on the availability of fishery data. Currently, the states of Washington and Oregon administer a trawl logbook on behalf of the Pacific Fishery Management Council (PFMC or Council) and NOAA's National Marine Fisheries Service (NMFS). The state of California repealed their requirement, effective April 1, 2019, therefore, NMFS created a federal requirement in order to maintain logbook coverage from trawl vessels in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. 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. Trawl logbook data is used in stock assessments, to evaluate spatial bycatch issues, and is used for fishery monitoring and enforcement.

A federal non-trawl logbook was developed and implemented in 2023. Data collected in the non-trawl logbook contributes to stock assessments, informs managers about location-specific catch and discards on non-observed trips and vessels, supports economic analysis, and provides effort information to quantify groundfish fishery effort to allow more precise estimation of bycatch of with Endangered Species Act (ESA) listed species, such as seabirds and humpback whales.

NMFS contracts with the Pacific States Marine Fisheries Commission (PSMFC) to distribute and collect the logbooks. These data are used regularly by NMFS, the Pacific Fishery Management Council, the West Coast Groundfish Observer Program, NMFS Office of Law Enforcement (OLE), and the United States Coast Guard (USCG) 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.

Currently, the states of Washington and Oregon administer a trawl logbook on behalf of the Council and NMFS. 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. 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. Trawl logbook data is used in stock assessments, to evaluate spatial bycatch issues, and is used for fishery monitoring and enforcement. The trawl logbook is required by regulation at 50 CFR 660.13(a)(1).

A federal non-trawl logbook was developed and implemented in 2023. The non-trawl logbook is required by regulation at 50 CFR 660.13(a)(2)-(3). Data collected in the non-trawl logbook contributes to stock assessments, informs managers about location-specific catch and discards on non-observed trips and vessels, supports economic analysis, and provides effort information to quantify groundfish fishery effort to allow more precise estimation of bycatch of with Endangered Species Act (ESA) listed species, such as seabirds and humpback whales. Implementation of a fixed gear logbook is a term and condition implementing Reasonable and Prudent Measure 4 of the 2017 Biological Opinion for Seabirds (FWS O1EOFWOO-2017-F-03 16).

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 logbooks are used regularly by NMFS, the PFMC, the West Coast Groundfish Observer Program, NMFS OLE, and the USCG 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.

Logbook information will be required to be recorded on every fishing trip. Electronic logbook data will be required to be submitted within a 24-hour period after a trip is concluded. Any limited usage of paper logbooks would be collected on a monthly basis. Fishers can submit logbooks more frequently (*e.g.*, after each fishing trip) if preferred.

The NMFS West Coast Region (WCR) contracts with the Pacific States Marine Fisheries Commission (PSMFC) to design and distribute the electronic logbook. The information collected from the logbooks will be shared with its respective state agencies (California Department of Fish and Wildlife, Oregon Department of Fish and Wildlife, or Washington Department of Fish and Wildlife) and the PFMC upon request.

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.

PSMFC, on behalf of NMFS, administers an electronic logbook for the non-trawl sectors

(FishVue Float). No paper logbook submission is allowed. The application is available free to fishery participants, and may be accessed on a smartphone, tablet, or computer.

The trawl logbook currently relies on the completion of paper forms, however, PSMFC is currently expanding the FishVue Float logbook application to include the trawl logbook. Starting in 2026, NMFS expects to allow both electronic and paper logbook submission for the trawl sector, and eventually shift to all electronic in the future.

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. For the non-trawl sectors, this logbook collection coastwide in the EEZ had no other duplicate information collection. Oregon state law previously required vessels to submit a fixed gear or nearshore logbook, depending on the gear used and fishing location. NMFS coordinated with the Oregon Department of Fish and Wildlife on an option to allow the submission of a single logbook to satisfy both the state and federal logbook requirement. No other existing information collections have full sector coverage for spatial catch, discard, and effort data; therefore, no duplication is occurring.

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.

Although nearly all vessels in the groundfish non-trawl fisheries are categorized as small businesses, this information collection request (ICR) is unlikely to result in a meaningful change in their operations, as efforts are taken to minimize burden. NMFS do not require real-time data submission, and only require logbook submission within 24 hours of landing.

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.

Currently, there is partial observer coverage in Federal non-trawl fishers off the West Coast. If this ICR was not conducted, NMFS and the PFMC would lack vital information on fishing

effort, location, and bycatch in these fisheries. In addition, there has been a significant push from the Council to open up and/or permit fishing with certain gear types inside the non-trawl rockfish conservation area to allow access to healthy, rebuilding rockfish species. If this ICR was not conducted, NMFS would be unable to track any bycatch or effort data in these newly opened fishing areas. Finally, this collection helps gather essential information to improve the risk assessment for these fisheries with regard to ESA-listed seabirds. Without logbook information, NMFS, the PFMC, and the U.S. Fish and Wildlife Service would lack set-level and trip-level data about fishing effort, which could maintain a very high level of uncertainty in estimates of ESA-listed seabird take.

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

By requiring reporting on a trip-by-trip basis (electronic submission) and/or monthly reporting (paper submission), this collection would require more frequent submission than the OMB guideline of quarterly reporting. Per trip and monthly reporting is necessary in order to obtain data in a timely enough manner through which in-season management adjustments can 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 more frequent submissions.

This collection is consistent with all other 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 31, 2025 (90 FR 14252) solicited public comment. No comments were received.

In addition to the Federal Register notice, NMFS contacted stakeholders 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, and on the data elements to be recorded, disclosed, or reported. No comments 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 confidentiality under the Magnuson Stevens Act section 402(b) as amended in 2006 (16 U.S.C. 1801, et seq.).

Consistent with OMB's guidance implementing the Privacy Act of 1974, "an agency record-keeping system on firms it regulates may contain "records" (i.e., personal information) about officers of the firm incident to evaluating the firm's performance. Even though these are clearly "records" under the "control of" an agency, they would not be considered part of a system as defined by the Act unless the agency accessed them by reference to a personal identifier (name, etc.). That is, if these hypothetical "records" are never retrieved except by reference to company identifier or some other nonpersonal indexing scheme (e.g., type of firm) they are not a part of a system of records." NOAA believes that this guidance speaks directly to this scenario and suggests that while the information system certainly will collect and maintain personally identifiable information (PII), they are not maintained in a system of records.

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.

Trawl logbook

The estimated potential total number of vessels affected is 33. This is the number of trawl vessels that have fished off California in recent years. The median number 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 estimated number of logbooks per year per vessel is eight. In addition, the estimated number of annual responses is 264.

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.

Non-trawl logbook

In order to estimate burden hours, we tabulated the number of unique vessels that have submitted a non-trawl logbook since implementation in 2023, which is 305 vessels. On average, vessels take 15.5 trips a year (rounded to 16 trips), a logbook submission is required for each trip. We estimate that the electronic logbook will take approximately 30 minutes or 0.5 hours per submission to complete. Non-trawl vessels typically have quicker at-sea sorting, less catch overall, and lower species diversity, so non-trawl logbook completion is quicker than trawl logbook.

Information Collection	Type of Respondent (e.g., Occupational Title)	# of Respondent s (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	Fishing Occupation 45-0000	33	8	264	8	2,112	\$19.46	\$41,100
Non-Trawl Logbook	Fishing Occupation 45-0000	305	16	4,880	0.5	2,440	\$19.46	\$47,482
Totals				5,144		4,552		\$85,582

The Hourly wage rate used is for 45-0000, Farming, Fishing, and Forestry Occupations, for the state of California from BLS. https://data.bls.gov/oes/#/area/0600000

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).

As noted above, trawl respondents have the option of electronic or paper for completion of this information collection. Non-trawl respondents must submit this information electronically.

For the trawl logbook paper submission, 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.

For the electronic logbook submission, there are no capital costs or ongoing operation and maintenance costs for respondents or record keepers. The electronic logbook application is available to download free of charge on a smart phone, a tablet, or computer (all fishers have at least one of these devices). Additionally, there is no charge for logbook submissions.

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	33	8	264	\$3	\$792
Non-Trawl Logbook	305	16	4,880	0	0
TOTALS	338		5,144		\$792

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.

NMFS estimated the ongoing burden hours spent to maintain the electronic logbook by both NMFS employees and PSMFC employees. PSMFC handles the majority of ongoing maintenance, therefore we anticipate no more than 36 hours per year for Band III, Step 2 NMFS employees. Based on the most recent Standard Pay Tables (https://www.commerce.gov/sites/default/files/2024-01/CAPS_rpStandard_2024.pdf).

The PSMFC estimates approximately 20 hours per week (*i.e.*, 80 hours per month), equivalent to Band III, Step 2 NMFS employee, will be spent on ongoing maintenance of the logbook, which includes verifying logbook information against fish tickets, fixing logbook entry errors, answering industry questions, coordinating information requests for NMFS and the PFMC, etc.

The paper logbooks are entered into the database by PSMFC staff. Each logbook takes on average 15 minutes to enter. Staff tasked with this work are equivalent to a NMFS Band II, Step 2. Therefore, an annual count of 264 logbooks would take staff, on average, 66 hours to enter

into the database.

Additionally, because NMFS and the PSMFC would provide pre-stamped envelopes to the vessels to submit the logbooks, there would be an additional cost to the government. Business reply pre-stamped envelopes for one months' worth of logbooks for trawl vessels typically costs \$3.03. For 33 respondents, for 12 months, that postage cost would be \$1,200.

Cost Descriptions	Grade/Step	Loaded Salary /Cost	% of Effort	Fringe (if Applicable)	Total Cost to Government
NIMES Employee	ZP-III/2	156.072	1.7%		2.452
NMFS Employee		,			2,653
PSMFC Employee	ZP-III/2	156,072	50%		78,036
PSMFC Employee	ZP-II/2	116,493	3%		3,495
Other Costs: Postage					1,200
TOTAL					85,384

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

OMB Control Number 0648-0804 is being merged into this control number.

	Respondents		Responses		Burden Hours			
Information Collection	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Current Renewal / Revision	Previous Renewal / Revision	Reason for change or adjustment	
Trawl Logbook	33	27	264	216	2,112	1,728	Updated number of participating vessels	
Non-Trawl Logbook	305	 0 	4,880	 0 	2,440	0	Merging the collections from 0648-0804 into this control number. The number of Respondents and Responses was updated to more accurately reflect the number of participants in the fishery. Collection 0648-0804 used data from 2019-2020 since there was a decline in fishing during COVID. This update reflects the most current data.	
Total for Collection	338	 27	5,144	216	4,552	1,728		
Difference	311		4,928		2,824			

	Miscell	aneous Costs	
Information Collection	Current	Previous	Reason for change or adjustment
Trawl Logbook	792	648	Updated number of participating vessels
Non-Trawl Logbook	0	0	
Total for Collection	792	 648	
Difference		144	

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 logbook data would be published as a regular procedure. However, the information collected would be used to inform fishery management and may be published in analyses (*e.g.*, PFMC Groundfish Management Team 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 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 <u>5 CFR 1320.9</u> and the related provisions of <u>5CFR 1320.8(b)(3)</u>.