Adrienne Thomas
NOAA PRA Officer

[Electronically submitted to Adrienne.thomas@noaa.gov on 10/17/2021]

Re: [OMB Control Number 0648-0773] Before the National Oceanic & Atmospheric Administration (NOAA), Commerce Comment on Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Economic Surveys of Specific U.S Commercial Fisheries

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Please accept the below comments for consideration in response to the Notice of Information Collection and request for comment from NOAA published in the *Federal Register* on September 28, 2021. My name is Joseph Mueller, and I am a Bachelor of Science candidate for Civil Engineering at Clarkson University in New York. Clarkson University is a private, national research university and a leader in technological education.

In order to streamline aligned and transparent data collection for the Economic Surveys of 16 U.S. Commercial Fisheries, the Department of Commerce requested public comments to assess the impact of information collection requirements and minimize the public's reporting burden. I agree that the proposed information collection is necessary for the understanding of economic performance for NOAA Fisheries and the Regional Fishery Management Councils (Councils). I support the following main points in regard to the proposed information collection:

- **Coordinated data to support data-driven collaboration with responsible outer continental shelf (OCS) development:** A coordinated approach will enable industry-wide collaboration and best-practice standards to uphold compliance with the Marine Mammal Protection Act (MMPA), the Endangered Species Act (ESA), the National Environmental Policy Act (NEPA) for future energy development in the OCS.
- **Transparent data collection to avoid and mitigate future impacts:** Obtaining the specified data improves the ability of NOAA Fisheries and the Regional Fishery Management Councils (Councils) to monitor, explain, and predict changes in the economic performance and impacts of the 16 federally managed commercial fisheries. The different components of operating costs/expenditures, earnings, employment, ownership, vessel characteristics, effort/gear descriptors, employment, and demographic information for the various types of fishing vessels may inform future environmental mitigation strategies.

In addition to supporting the proposed information collection, I would respectfully note additional resources may be required in regard to *II. Method of Data Collection.*

- **Provide additional data platforms to streamline voluntary collection:** While the proposed voluntary method of information collection will be by mail, internet, phone, and in-person interviews, adding additional methodologies, such as a crowd-source data

submission portal, will promote preparation of data submission. In addition, establishing a clear collection schedule and required data submission may be useful to emphasize the importance of this information.

The information requested will be of practical utility to environmentalists. As a civil engineering student, I understand the importance of data transparency and how it affects the public and the ability to make informed decisions. The use of transparent data collection will help avoid and mitigate future impacts from commercial fisheries. I am also aware of the increasingly severe problems of overfishing and the effects that commercial fishing has on the environment. I believe that a revision and extension of currently approved data collection will be important in regulating commercial fisheries and reducing the damage to ocean habitats. Marine habits are important to the ecosystem and provide key benefits to the environment. By having a coordinated approach to data collection, fisheries will be able to understand the impacts that they are having on several different industries such as stock assessments, strategic planning for marine infrastructure and fishing allocation decisions. I look forward to following ongoing discussions regarding this notice.

Sincerely,
Joseph Mueller
B.S. Civil Engineering