

April 11, 2016

Jennifer Jessup, Departmental Paperwork Clearance Officer
Department of Commerce, Room 6616
14th and Constitution Avenue NW
Washington, D.C. 20230

RE: Proposed Information Collection; West Coast Fisheries Participation Survey

Dear Ms. Jessup:

Ocean Conservancy¹ commends the National Marine Fisheries Service (NMFS) for its commitment to on-going collection of social and economic data that can help NMFS and others better understand the complex dynamics of West Coast fishing communities, and we appreciate the opportunity to comment on this proposed information request. In response to the following invited comments:

(a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

The scope of proposed information collection can greatly enhance the proper performance of the functions of NMFS and will have practical utility for agency scientists, managers, and fishery stakeholders. Expanding NMFS's understanding of the relationship between social and economic factors and the physical ecosystem will significantly improve responsiveness to requests of stakeholders and managers for this type of information and meets key requirements of the Magnuson-Stevens Fishery Conservation and Management Act (MSA).² In the larger context of data, information, and analysis that NMFS collects and conducts, studies and surveys that focus on the social components of fisheries are relatively sparse. We appreciate this effort and others by the agency to bolster this body of knowledge, and encourage further data collection and studies similar to this request.

If NMFS is to achieve optimum yield and move toward ecosystem-based fishery management (EBFM), a better understanding of the social and economic underpinnings of existing and proposed policies is important. Optimum yield requires the consideration of ecological, social and economic factors.³ This survey will improve the information managers have available about the existing relationships between the physical environment and social and economic factors, as well as a better understanding of the potential outcomes of their decisions. Today, many of these decisions are driven by anecdotal information and personal experience, as opposed to factual evidence or analysis provided from the social sciences. While the political underpinnings of Regional Fishery Management Council decision-

¹ Ocean Conservancy is a non-profit organization that educates and empowers citizens to take action on behalf of the ocean. From the Arctic to the Gulf of Mexico to the halls of Congress, Ocean Conservancy brings people together to find solutions for our water planet. Informed by science, our work guides policy and engages people in protecting the ocean and its wildlife for future generations.

² See, e.g., 16 U.S.C. §§ 1802(33); 1851(a)(1 & 2); 1852(g)(1)(B); 1853(a & b).

³ 16 U.S.C. § 1802(33).

making that also contribute to this process are beyond the scope of this letter, stronger social science and greater inclusion of social and economic data and analysis will undoubtedly aid Councils and NMFS when considering management actions, and better support the legally mandated achievement of optimum yield.⁴

Further, as NMFS implements its new EBFM policy,⁵ the inclusion of social and economic data becomes even more important; strategies and tools that bring ecosystem information into management often depend on or are strengthened by social and economic data and analysis. For example, the Pacific Fishery Management Council maintains a Fishery Ecosystem Plan that calls for an annual ecosystem report produced by the NMFS California Current Integrated Ecosystem Assessment (IEA) program. The ecosystem report has strong oceanographic and biological sections, but limited information on social and economic analysis.⁶

Increased attention and resources to fill these gaps requires primary data collection such as that found in the proposed survey. As such, we support the efforts of this survey and look forward to its results. Dr. Karma Norman's proposed survey and analysis concentrates on better understanding the choices fisherman with diverse permit or quota portfolios make when faced with changing social and environmental factors. This fundamental knowledge is critical for understanding the effect existing policies have on fisherman and fishing communities, and can better inform future decisions by helping predict the outcomes of potential management actions. This will contribute to not only the existing body of knowledge around the relationship of social factors to environmental, but will also be in direct service to managers.

(b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information

We have limited knowledge regarding internal allocations of employee time and budgetary allotments within NMFS and the Science Centers; however, given that this is a crucial element to fishery management, we believe the limited burden imposed on the agency is appropriate. Similarly, the burden this will have on survey participants is limited and appropriate, especially given the great need for such information in the fishery management process.

(c) way to enhance the quality, utility, and clarity of the information collected

The proposed information to be collected is appropriate and greatly needed. The scope appears to have been well thought out and is both simple and concise enough that respondents should not feel overburdened to complete the survey. To enhance quality, utility, and clarity of information collected, we urge NMFS to ensure that data and findings are made available to research partners and the public, and are used to inform Council management decisions in a timely manner.

⁴ 16 U.S.C. § 1851(a)(1).

⁵ National Marine Fisheries Service Policy Directive, Ecosystem-Based Fisheries Management Policy, Discussion Draft (Sept. 9, 2015).

⁶ Pacific Fishery Management Council Meeting, September 2015, Scientific and Statistical Committee Supplemental Report, Agenda Item D.1.a., available at http://www.pcouncil.org/wp-content/uploads/2015/09/D1a_SUP_SSC_SEPT2015BB.pdf.

(d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

As noted above, the burden on respondents is minimal and appropriate. A mail survey is an effective means of information collection and can be completed with very limited effort. However, we recommend that NMFS continue to investigate alternative methods (e.g. electronic data collection and submission) that will produce and provide more timely and cost effective data. For example, the survey could include a request for an email address for each permit holder with the goal of switching to an electronic system in future years.

In closing, we appreciate the opportunity to comment on this proposed data collection, and strongly support the work of Dr. Karma Norman and other NMFS scientists to further the collection and analysis of critical social data and information.

Sincerely,

A handwritten signature in black ink that reads "Corey Ridings". The signature is written in a cursive, slightly slanted style.

Corey Ridings
Policy Analyst

A handwritten signature in black ink that appears to read "Ivy". The signature is written in a cursive, slanted style with a long, sweeping underline.

Ivy Fredrickson
Staff Attorney