

May 5, 2019

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

RE: Federal Trawl Logbook Information Collection Opportunity to Comment

Dear Ms. Jessup:

The Nature Conservancy (TNC) is committed to improving the quality, quantity, and timeliness of data available to support healthy marine ecosystems, sustainable state and Federal fisheries, and thriving coastal communities. Our twelve-year engagement in the West Coast groundfish fishery has focused on supporting improvements to the environmental and economic performance of the fishery. TNC owns and manages fishing permits and quota in the groundfish fishery, and in partnership with fishermen and California fishing communities we piloted the use of fisheries information technology systems such as electronic logbooks and electronic monitoring systems. We appreciate the opportunity to apply our direct experience as participants in the West Coast groundfish fishery to provide input on the notice for the creation of a Federal trawl logbook requirement for this fishery.

Effective, science-based fisheries management in part depends on the reliability and availability of fisheries data. Logbooks provide a key source of information on the intensity and distribution of fishing catch and effort, and thus the creation of a federal logbook requirement for California is necessary to maintain important data collection for management purposes.

In a time of unprecedented change in our ocean environment, responsive and adaptive management requires timely and reliable data. Modernized fisheries information systems can enhance the quality, utility and clarity of certain fisheries data, and minimize the burden of collecting and managing such data. We therefore offer recommendations on how a new federal logbook requirement could be designed such that it is readily adaptable and supports a modernized fisheries information system.

TNC has partnered with fishermen in the groundfish fishery to pilot the use of information technology tools including electronic reporting (ER) and electronic monitoring (EM). From 2015 to present, we have used exempted fishing permits (EFPs) to test and implement EM in the groundfish fishery. The Pacific States Marine Fisheries Commission (PSMFC) developed an EM-specific logbook for use by participating vessels to document discarded species in addition to the previously required California state logbook that only documented retained species. As the National Marine Fisheries Service (NMFS) proceeds with rulemakings for an EM program in the groundfish fishery, it is important that the new federal logbook requirement is adaptable and functional for vessels that choose to use either human observers or EM for compliance monitoring. Specifically, the logbook should include fields for both discarded and retained species, thereby potentially reducing the number of logbooks required to be filled out by vessels using EM and improving overall efficiencies.

The new federal logbook should also be developed to allow for electronic submission in the near future. Generally, inefficiencies in paper logbook systems can result in delays in data integration and can compromise overall data quality through transcription or other errors. For example, in the groundfish fishery, some vessels using EFPs for EM are currently taking digital photos of their paper logbooks and are texting or emailing those photos to fishery managers to support expedited EM video review while paper logbooks are still in the mail. This process could be improved for fishermen, managers, and service providers with a new federal logbook requirement and standard. The new federal logbook could be better integrated with EM systems allowing for improved data collection and submission options, as well as improving the efficiency of compliance monitoring. Electronic reporting systems provide for more efficient and timely submission of critical fishery-dependent information, supporting adaptive and responsive management. NMFS should consider creating the federal logbook standard in a manner that would allow for electronic collection and submission to lessen burdens on both respondents and managers.

In sum, to maximize utility and minimize reporting burden, a new federal logbook requirement should create a logbook standard that would allow for utilization of new information technologies, better integration with EM systems, and electronic collection and submission.

Thank you again for the opportunity to provide comment on this proposed information collection.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kate Kauer", with a stylized, flowing script.

Kate Kauer  
Associate Director, Oceans Program  
The Nature Conservancy California