DRAFT FOR INITIAL REVIEW

Regulatory Impact Review for Proposed Amendment to the Fishery Management Plans for Groundfish of the Bering Sea/Aleutian Islands Management Area, Groundfish of the Gulf of Alaska, Bering Sea/Aleutian Islands King and Tanner Crab, Scallop Fishery off Alaska, Salmon Fisheries of the EEZ off Alaska, Fish Resources of the Arctic Management Area and Regulatory Reporting Requirements for the Federal Fisheries off of Alaska

Crew Data Collection

September 9, 2024

For further information contact: Sarah Marrinan, North Pacific Fishery Management Council
1007 West Third Avenue, Suite 400, Anchorage, AK 99501
(907) 271-2809

Stephanie Warpinski, Alaska Regional Office
National Marine Fisheries Service
P. O. Box 21668, Juneau, AK 99802-1668
(907) 586-7221

Abstract: This Regulatory Impact Review (RIR) examines the benefits and costs of proposed fishery management plan and regulatory amendments affecting required reporting for the Federal Fishery of Alaska. The action Alternative would require all participating vessel owners to complete an annual form documenting the crew members participating and the payments to crew. This proposed action is a mandatory annual reporting requirement intended to improve the availability of fishery participation data in order to recognize the communities and persons that are impacted by changes in the North Pacific Fisheries

For definition of acronyms and abbreviations, see online list: https://www.npfmc.org/library/acronyms

Table of Contents

Executive Summary

This Regulatory Impact Review analyzes management measures under consideration by the Council that would apply to all owners of vessels that participate in the federally managed fisheries of Alaska. This includes vessels that participate in the: groundfish fishery of the Bering Sea and Aleutian Islands (BSAI), the groundfish fishery of the Gulf of Alaska (GOA), king and Tanner crab fishery in the Bering Sea and Aleutian Islands, the halibut and sablefish IFQ fishery of the BSAI and GOA, scallop fishery of the Gulf of Alaska, the CDQ fisheries of the Bering Sea and Aleutian Islands and the salmon fishery in the EEZ Off the Coast of Alaska. The measure under consideration would require all participating vessel owners to complete an annual form documenting the license number of participating crew members, the payments to crew, and the number of positions employed.

Purpose and Need

The purpose of this action is to collect data associated with crew working on vessels that are active in the federally managed fisheries of Alaska. This action would facilitate analysis of communities and persons that may be impacted by changes from future regulatory actions in the North Pacific Fisheries.

The Council adopted the following purpose and need statement to originate this action in June 2023:

> Currently only two federal fisheries in the North Pacific consistently collect information relative to crew on fishing vessels through a NMFS economic data report (EDR) program, thus there is not a regular mechanism in place to provide quantitative data in most Council analyses to understand impacts on this important component of fisheries participation. The Council is considering annual data collection to include crew license data, crew compensation, and number of crew positions on vessels operating in federal fisheries to support economic and community impact analyses required for FMP and regulatory amendments. Any proposed collection mechanism should provide useable data by fishery while minimizing reporting burden and costs to fisheries participants and NMFS.

Alternatives

In June 2023, the Council passed a motion with the following Alternatives for analysis.

Alternative 1. No action

Alternative 2. Implement an annual data collection to collect crew license data, crew compensation, and number of crew positions on vessels operating in commercial federal fisheries in the North Pacific. Data need to be able to be delineated by fishery and area. Charter halibut vessels and vessels only active in State waters are not included.

Option 1: Fisheries currently subject to EDR (Economic Data Report) that include crew data (BSAI crab rationalization and BSAI Am 80) will not be subject to a new data collection effort but have their existing EDR forms modified to be consistent with the data points under Alternative 2.

Economic and Social Impacts

Selecting **Alternative 1** (no action) would leave the current annual reporting for crew participation in place which requires participants in the Amendment 80 Program and Crab Rationalization Program to submit annual EDRs (Economic Data Report) containing crew data. All other participants of the North Pacific Fishery would not submit information on crew participation. The crew members participating in those other sectors would not be known, the communities of those crew members would likewise not be

known, and the amount of compensation from those sectors to crew members and the communities that benefit from crew compensation would also not be known. As a result, the Council would continue to have limited capacity to understand and evaluate the social and economic impacts of past and prospective management decisions in terms of the magnitude and distribution of those effects associated with employment and participation in fishery-related occupations among industry sectors, and to fishery-dependent communities in the form of earned labor income and fisheries employment-based pathways to economic opportunity.

Alternative 2 would require vessels participating in North Pacific federal fisheries to complete an annual form to document crew participants, crew compensation and crew positions. The charter halibut sector and vessels that only participate in state waters would be excluded. The annual data collection would cause direct costs to be accrued to NMFS and vessel owners while improving community impact assessments and providing opportunities to engage crew members.

This additional data collection would result in direct costs to certain individuals and entities, which are weighed against more dispersed and broad benefits that are more difficult to quantify. The annual data collection would cause direct costs to be accrued to NOAA for implementation of the collection and vessel owners for completing the questionnaire. This additional information could improve community impact assessments and provide opportunities to recognize crew members' participation. Collecting crew data could lead to a more complete picture of the effects of proposed Council actions that could have negative or positive impacts on the economic, social, and policy aspects of the fishing industry and communities. These data could also be used to support the allocation of disaster relief funds with more systematic notification to crew, promote economic stability, allow for pathways to additional research to explore important socio-economic conditions in fishing communities, increase industry resilience, and identify economic development opportunities.

Environmental Impacts

This amendment was determined to qualify for a categorical exclusion. As a result, an Environmental Assessment was not required or prepared for this action.

Comparison of Alternatives for Decision-making

While the upfront costs of implementing a comprehensive crew data collection are significant, they are countered by the long-term benefits of more robust data including informed decision-making including more complete community impact assessments and equitable resource distribution. In contrast, the costs of not collecting crew data are derived from the inability to identify fishery participants, specifically crew members. The lack of fishery participant information could lead to under allocated disaster relief funds, missed economic opportunities, and less robust impact analysis. The inability to understand and robustly evaluate the social and economic effects of management actions can result in unintended negative impacts on the fishing industry and the dependent communities.

1 Introduction

In June 2023, the North Pacific Fishery Management Council (Council) directed staff to provide an initial review evaluating the implementation of a Data Collection program to collect Alaska Department of Fish and Game (ADFG) or Commercial Entry Fisheries Commission (CFEC) crew licenses; estimated crew compensation; and the number of crew positions on vessels operating in federal fisheries. The Council also requested that the initial review evaluate the scale of data to be collected by fishery and area and outline a simple annual collection mechanism(s) and associated cost/burden.

This document is a Regulatory Impact Review (RIR). An RIR provides assessments of the benefits and costs of the proposed alternatives, the distribution of impacts, and identification of the small entities that

may be affected by the alternatives (the RIR). The preparation of an RIR[1] is required under Presidential Executive Order (E.O.) 12866 (58 FR 51735, October 4, 1993) as amended through E.O. 14094, April 6, 2023 (88 FR 21879). The requirements for all regulatory actions specified in E.O. 12866 are summarized in the following Statement from the E.O.:

> *In deciding whether and how to regulate, agencies should assess all costs and benefits of available regulatory alternatives, including the alternative of not regulating. Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider. Further, in choosing among alternative regulatory approaches agencies should select those approaches that maximize net benefits (including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity), unless a statute requires another regulatory approach.*

E.O. 12866, as amended by E.O. 14094 requires that the Office of Management and Budget review proposed regulatory programs that are considered to be "significant." A "significant regulatory action" is one that is likely to:

- Have an annual effect on the economy of $200 million or more (adjusted every 3 years by the Administrator of OIRA for changes in gross domestic product); or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, territorial, or tribal governments or communities;
- Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency;
- Materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or
- Raise legal or policy issues for which centralized review would meaningfully further the President's priorities or the principles set forth in this Executive order, as specifically authorized in a timely manner by the Administrator of OIRA in each case.

This RIR analyzes management measures under consideration by the Council that would apply to all owners of vessels that participated in the federally managed fisheries in the EEZ off of Alaska. This includes vessels that participated in the; groundfish fishery of the BSAI, the groundfish fishery of the GOA, king and Tanner crab fishery in the BSAI, the halibut and sablefish IFQ fishery of the BSAI and GOA, scallop fishery of the Gulf of Alaska, salmon fishery in the EEZ Off the Coast of Alaska and the CDQ fisheries of the Bering Sea and Aleutian Islands. The measure under consideration would require all participating vessel owners to complete an annual data collection form documenting the crew members participating on their vessel, the types of crew positions and the payments to crew.

[1] NMFS has preliminarily determined this action does not have the potential to individually or cumulatively have a significant effect on the quality of the human environment and qualifies for a Categorical Exclusion under NEPA. The proposed action is expected to fall within Category A1 Trust Resource Management Action - an action that is a technical correction or a change to a fishery management action or regulation, which does not result in a substantial change in any of the following: fishing location, timing, effort, authorized gear types, or harvest levels. The action can be reviewed independently from other actions under NEPA, and there are no extraordinary circumstances that may require further analysis in an Environmental Assessment or an Environmental Impact Statement.

1.1 Purpose and Need

The purpose of this action is to collect crew data associated with the crew working on vessels that are active in the federally managed fishery of Alaska. This action would facilitate analysis of communities and persons that may be impacted by changes from future regulatory actions in the North Pacific Fisheries.

The Council adopted the following purpose and need statement to originate this action in June 2023:

> Currently only two federal fisheries in the North Pacific consistently collect information relative to crew on fishing vessels through a NMFS economic data report (EDR) program, thus there is not a regular mechanism in place to provide quantitative data in most Council analyses to understand impacts on this important component of fisheries participation. The Council is considering annual data collection to include crew license data, crew compensation, and number of crew positions on vessels operating in federal fisheries to support economic and community impact analyses required for FMP and regulatory amendments. Any proposed collection mechanism should provide useable data by fishery while minimizing reporting burden and costs to fisheries participants and NMFS.

1.2 History of this Action at the Council

The Council and NMFS have implemented four data collection programs in the federally managed groundfish and crab fisheries of Alaska. All four data collections have been referred to as Economic Data Reports or EDRs. To various degrees, the EDRs gather ownership, revenue, cost, vessel operations, and employment information from vessel owners, vessel operators, processors, permit holders, and leaseholders who participate in specific catch share programs in the North Pacific fishery. The catch share programs that are subject to some form of EDR requirements are (1) the BSAI Crab Rationalization Program, (2) BSAI Amendment 80, and (3) American Fisheries Act (AFA) pollock fisheries. The BSAI Crab Rationalization Program and BSAI Amendment 80 data collections include crew information while the AFA pollock fisheries EDRs do not. Formerly, the limited access (non-catch share) Gulf of Alaska groundfish trawl fishery was subject to EDR requirements, which were discontinued as of 2022.

The purpose of the EDR requirements is to gather information to improve the Council's ability to analyze the economic effects of the catch share or rationalization programs, understand the economic performance of participants in these programs, and help estimate the impacts of future issues, problems, or proposed revisions to the programs covered by the EDRs. The first EDR program was initiated in 2006 under the Crab Rationalization program.

In February 2022, the Council recommended changes to the EDR program including the removal of third-party audits, changes in the confidentiality requirement, and the removal of the GOA Groundfish Trawl EDR requirement. The GOA trawl EDR requirement, effective in 2015 and applying to catcher vessels, catcher processors, and shoreside processors participating in Gulf of Alaska groundfish trawl fisheries, was the first time that the Council had established an EDR as a baseline for data prior to implementation of a catch share program. Upon the removal of the GOA trawl EDR requirement in 2022 a discussion paper was requested to bring forward data components that are not currently collected across all sectors but could improve FMP and regulatory impact analyses if collected and/or should continue to be collected from catch share programs and could inform potential revisions to current EDR requirements.

In October of 2022, the Council reviewed the Universal Data Collection discussion paper that identified four data components that could benefit analytical documents: crew licenses, crew compensation, fuel/lube costs, and lease costs. The discussion paper also included ways in which the reporting burden could be reduced. Upon reviewing the discussion paper, the Council identified three data components to be brought forward in an expanded discussion paper which would also include a more complete analysis

of the scope and cost of the proposed data collection. The three components included were: (1) crew licenses, (2) crew positions, and (3) crew compensation. The Council also requested a review of NMFS's ability to collect quota lease costs.

In February of 2023, the Council reviewed the focused second version of a Universal Data Collection discussion paper. Upon reviewing the discussion paper, the Council requested the SSC review the staff paper and provide input to the Council on the proposed mechanism, value of the crew data to be collected, and any additional recommendations that would aid in a simple data collection process.

The SSC reviewed the paper and received a presentation in June 2023 (SSC minutes). The SSC strongly supported the collection of socioeconomic data to enable documenting performance for monitoring, program reviews, and as inputs for adaptive management in a dynamic natural environment. The SSC supported (1) uniform collection from all vessels to collect data on crew and (2) updating the current EDR fields to be consistent with this effort. The SSC also supported the planned, incremental approach, prioritizing simple data collections where crew data collection would proceed, followed by consideration of other socioeconomic data and aligning EDRs to create uniform data products. Following the SSC review the Council initiated analysis of an annual data collection focused on crew participation.

1.3 Statutory Authority

Under the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) (16 U.S.C. 1801, et seq.), the United States has exclusive fishery management authority over all marine fishery resources found within the exclusive economic zone (EEZ). The management of these marine resources is vested in the Secretary of Commerce (Secretary) and in the regional fishery management councils. In the Alaska Region, the Council has the responsibility for preparing fishery management plans (FMPs) and FMP amendments for the marine fisheries that require conservation and management, and for submitting its recommendations to the Secretary. Upon approval by the Secretary, NMFS is charged with carrying out the Federal mandates of the Department of Commerce with regard to marine and anadromous fish.

1.4 Documents Incorporated by Reference in this Analysis

This impact assessment relies heavily on the information and evaluation contained in previous analyses, these documents are incorporated by reference. The documents listed below contain information about the fishery management areas, fisheries, marine resources, ecosystem, social, and economic elements of the fisheries. They also include comprehensive analysis of the effects of the fisheries on the human environment and are referenced in the analysis of impacts throughout this document.

Stock Assessment and Fishery Evaluation Reports for the Groundfish Resources of the BSAI and GOA (NPFMC 2023).

Annual SAFE reports review recent research and provide estimates of the biomass of each species and other biological parameters. The SAFE report includes the acceptable biological catch (ABC) specifications used by NMFS in the annual harvest specifications. The SAFE report also summarizes available information on the ecosystems and the economic condition of the groundfish fisheries off Alaska. This document is available at North Pacific Groundfish Stock Assessments and Fishery Evaluation Reports | NOAA Fisheries.

Alaska Crab Stock Assessment and Fishery Evaluation Reports (NPFMC 2023).

Annual SAFE reports review recent research and provide estimates of the biomass of each species and other biological parameters. The SAFE report includes the acceptable biological catch (ABC)

specifications used by NMFS in the annual harvest specifications. The SAFE report also summarizes available information on the ecosystems and the economic condition of the crab fisheries off Alaska. This document is available at Alaska Crab Stock Assessment and Fishery Evaluation Reports | NOAA Fisheries.

Stock Assessment and Fishery Evaluation Reports for the Scallop Fishery off Alaska (NPFMC 2024).

Annual SAFE reports review recent research and provide estimates of the biomass of each species and other biological parameters. The SAFE report includes the acceptable biological catch (ABC) specifications used by NMFS in the annual harvest specifications. The SAFE report also summarizes available information on the ecosystems and the economic condition of the scallop fishery off Alaska. This document is available at Alaska Scallop Fishery Management Plan | NOAA Fisheries.

Halibut Sablefish IFQ Program Review (NPFMC 2016).

Recurring program reviews provides description of management and analysis of total allowable catch (TAC), harvest, revenue and impacts. The report summarizes available information on the ecosystems and the economic condition of the IFQ fishery off Alaska. This document is available at https://www.npfmc.org/allocation-and-program-review/.

2 Description of Alternatives

In June 2023 the Council adopted the following alternatives for analysis.

Alternative 1. No action

Alternative 2. Implement an annual data collection to collect crew license data, crew compensation, and number of crew positions on vessels operating in commercial federal fisheries in the North Pacific. Data need to be able to be delineated by fishery and area. Charter halibut vessels and vessels only active in State waters are not included.

Option 1: Fisheries currently subject to EDR (Economic Data Report) that include crew data (BSAI crab rationalization and BSAI Am 80) will not be subject to a new data collection effort but have their existing EDR forms modified to be consistent with the data points under Alternative 2.

2.1 Alternative 1, No Action

Under the no action alternative, crew information would only be available for vessels that submit EDRs with crew information. As of 2023, 59 of the 1,031 vessels active in federally or jointly managed fisheries off Alaska were required to submit EDRs containing crew data (BSAI crab rationalization and BSAI Am 80). For the other 972 vessels, the persons working as crew, the amount of compensation crew receives and the type of paid positions on vessels participating in the fishery would not be known. The community impact from crew compensation by those vessels would also not be known.

2.2 Alternative 2, Implement Annual Data Collection

This alternative expands the federal requirement to complete an annual form that includes crew licenses, crew compensation and crew positions to all vessel owners participating in federally or jointly managed fisheries of Alaska in the EEZ off of Alaska. The only exception would be halibut charter operators, who would not be required to report while operating in the EEZ. In 2023, 677 vessels participated in the

fisheries subject to the proposed annual data collection, 359 of the 1,031 vessels were only active in state waters which would exclude them from the data collection. The 677 vessels owners would be annually required to maintain records and complete an annual form of crew licenses that were active on their vessel, the estimated amount of compensation paid to crewmembers and the type of crew positions that were compensated.

Option 1 states that fisheries currently subject to EDRs that include crew data will not be subject to a new data collection effort. This option is specific to the BSAI Crab Rationalization program and the BSAI Amendment 80 EDRs because these data collections already collect data on active crewmembers. If option 1 were selected vessel owners participating in BSAI Crab Rationalization program and the BSAI Amendment 80 EDR would not be required to complete an additional form. The current BSAI Crab Rationalization program and the BSAI Amendment 80 EDR forms would be modified to mirror the crew data collected under the proposed annual Crew Data Collection form. The changes to the current EDRs would include submitting processing crew licenses when available, identifying vessels with hired captains and noting the fishery that crewmembers participate in.

The third existing EDR was developed along with Amendment 91 for the BSAI Groundfish FMP and is focused around salmon bycatch in the BS pollock fishery. Therefore, these reports do not include a crew data collection component for AFA vessels. Therefore, under Alternative 2 AFA vessels would be subject to this additional data collection form.

If Alternative 2 was selected without option 1 the Council may need to specify the application of the new data collection relative to existing EDRs as the BSAI Crab Rationalization program and the BSAI Amendment 80 program would have duplicative data collections containing crew information.

3 Description of the Fisheries

The proposed action would apply for all vessel owners participating in federally managed or jointly managed commercial fisheries in the EEZ off Alaska, exclusive of vessels participating exclusively in for-hire recreational fishing..

The groundfish fisheries in the EEZ off Alaska are managed under the Fishery Management Plan for Groundfish of the Bering Sea and Aleutian Islands Management Area (BSAI FMP) and the Fishery Management Plan for Groundfish of the Gulf of Alaska (GOA FMP). The king and tanner crab fisheries in the EEZ off Alaska are managed under the Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs (Crab FMP). The scallop fishery is managed under the Fishery Management Plan for the Scallop Fishery of Alaska (Scallop FMP) and the salmon fishery is managed under the Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska. The IFQ Program Review presented at the October 2016 Council meeting provides a comprehensive assessment of the IFQ Program. The proposed action under consideration would amend these FMPs and Federal regulations at 50 CFR 679 and 50 CFR 680. Actions taken to amend FMPs or implement regulations governing these fisheries must meet the requirements of applicable Federal laws, regulations, and Executive Orders.

It is standard practice to provide information on fishery participation, harvest, revenue, and where available and relevant, community involvement, in fishery management and regulatory analyses. The purpose of inclusion of such information in an RIR is to create a baseline against which to compare the impacts and effect of the action alternatives under consideration. However, the proposed data collection is not expected to change fishing practices, gear use, the spatial distribution of the fleets, or have any allocative implications for the current fisheries. Therefore, instead of providing extensive background and data on current operations that are not expected to change as a direct effect of any action alternative, this analysis incorporates by reference fishery descriptions that are included in: the Stock Assessment and Fishery Evaluation Report for the Scallop Fishery off Alaska (NMFS, 2023); the Stock Assessment and Fishery Evaluation Report for Crab Fisheries of the Bering Sea/Aleutian Islands (NMFS, 2023); the Stock

Assessment and Fishery Evaluation Report for Groundfish Fisheries of the Gulf of Alaska and the Bering Sea/Aleutian Islands (NMFS 2023); the Stock Assessment and Fishery Evaluation Report for the Salmon Fishery of the Cook Inlet Exclusive Economic Zone Area (NMFS 2024); and the IFQ Program Review presented at the October 2016 Council meeting (NPFMC/NMFS 2016) as fishery descriptions.

The potential benefits of the action are discussed in Section 4.2 in terms of the information we currently available on crew and relative to the potential uses of a wider collection of this information about crew. This analysis also provides estimates of expected programmatic costs and industry compliance costs, with baseline costs included in the impact analysis.

4 Analysis of Impacts

4.1 Analysis of Impacts, Alternative 1 No Action

Currently, data identifying crew and crew compensation is only collected for vessels that are compliant with EDR requirements under the Crab Rationalization program (at 50 CFR 680.6) and Amendment 80 program (at 50 CFR 679.94). As of 2023, this accounted for 59 of the 1,031 vessels active in federally or jointly managed fisheries off Alaska. The crew members of the other 972 active vessels are not known. If no action were taken, the Council would continue to lack quantitative information on trends relative to crew positions, changes in compensation, and community representation. The Council would continue to be reliant on vessel owner's residency information for community impacts assessments for proposed management actions. Additionally, the ability to identify crew members would not be available.

4.2 Analysis of Impacts, Alternative 2

This alternative requires that all vessels participating in federally or jointly managed fisheries of the EEZ off Alaska annually complete and submit a form to provide data on active crew members, the compensation to crew members, and the number and type of positions that were active on a vessel in a given year. The data collection is intended to be a simple, straight forward form that would be completed annually by the vessel owner. The proposed action is not intended to be an in-depth survey of crew members. Respondents and NMFS would incur direct costs associated with completing, implementing and enforcing the data collection. The indirect benefits of the data collection would more dispersed and more difficult to quantify. A direct benefit would be more robust and inclusive data for community impact assessments. Another potential benefit is more equitable and systematic distribution of disaster relief funding or other potential federal funding. Further benefits are less tangible but may include other analytical products, crew research initiatives, community resilience programs and evaluation of crew quota.

This analysis covers implementation components to consider in establishing this type of data collection. This includes the entities subject to the data collection, how the collection is to be administered, and the enforcement method used to promote compliance. Additionally, the costs and benefits of a Crew Data Collection are analyzed below.

4.2.1 Implementation Consideration

4.2.1.1 Participation

The owners of vessels active in federal or jointly managed fisheries in the EEZ of off Alaska would be required to submit the annual form. Vessel owners of halibut charter vessels would not be required to complete the form because crew members on halibut charter vessels are not required to obtain ADFG or CFEC crew licenses. The action alternative also does not require vessels that are active only in state

waters to comply with the data collection. In 2023, 352 of the total 1,031 vessels participating in federally or jointly managed fisheries operated only in state waters. Those vessels were mostly in the halibut/sablefish CDQ/IFQ fleet (312 vessels), jig fleet (60 vessels), or pot fleet (6 vessels). The data gap from vessels that only participate in state waters would likely degrade the usefulness of the crew data collection especially for fleets that have a high degree of participation in state waters only. The Council may want to consider methods to encourage participation for vessels operating in parallel waters fisheries, federal fisheries prosecuted in state waters.

Table 1 below identifies the number of vessels that would be required to complete the annual data collection. In 2023, 672 vessels had landings in the federally or jointly managed fisheries in the EEZ off of Alaska. In considering the burden of the data collection it may be necessary to consider what types of changes in fishery participation might occur. For example, the halibut CDQ fleet and jig fleet have fluctuated significantly over time. Another potential change to the number of vessels participating is the introduction of the Upper Cook Inlet salmon drift gillnet fishery in 2024, which is not represented in the table. The fishery included 278 participating vessels in 2023.[2]

Table 1. Number of Vessels Participating in Federal Fishery in Federal Waters of Alaska by Fleet (2023)

Fleet	Total Vessels	EEZ Active Vessels	EDR Required	Limited Access Privilege Program
Amendment 80	18	18	Y	Y
AFA Catcher Processor	13	13	N	Y
AFA CV Mothership	11	11	N	Y
AFA CV Shoreside	71	71	N	Y
Non-AFA BSAI Trawl	17	17	N	N
Halibut IFQ	682	381	N	Y
Halibut CDQ	20	14	N	Y
Sablefish IFQ	288	279	N	Y
Freezer Longliner	20	20	N	N
Pot	95	89	N	N
Central Gulf Trawl	44	44	N	N
Central Gulf Rockfish	26	26	N	Y
Western Gulf Trawl	32	31	N	N
Longline CV	30	29	N	N
Jig	100	40	N	N
Crab Rationalization	41	41	Y	Y
Non-Rationalized BSAI Crab	34	34	N	N
Scallop	2	2	N	N
Total	1,031	672	59	904 (592 EEZ)

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

*Vessels and fleets may operate in CDQ and non-CDQ except for the Halibut CDQ fleet

[2] https://www.fisheries.noaa.gov/alaska/commercial-fishing/salmon-management-federal-waters-cook-inlet-cook-inlet-eez

4.2.1.2 Administration of the Data Collection

NMFS would administer the Crew Data Collection. NMFS may collect the data or the agency may select a third-party Data Collection Agent (DCA) to facilitate the data collection, or leverage contractors, or use a combination of those resources. Currently, NMFS works with a DCA to administer the EDR programs and below is a description of the current EDR process, which could be used as a model for the Crew Data Collection under Alternative 2.

Currently, the Pacific States Marine Fisheries Commission (PSMFC) operates as the independent third-party DCA for the EDR programs. In collaboration with NMFS, PSMFC has developed a robust infrastructure for administering EDRs including an online portal for submission, data validation, and data distribution[3]. On an annual basis, PSMFC uses landing information to identify vessels that participate in fisheries subject to EDR requirements. The vessel owners are requested to complete the annual EDR data collection requirement. The EDRs are due June 1st of the following year. After the deadline, PSMFC reviews the list of vessels that are required to submit an annual form and identifies any vessels that have not completed the form. The vessel owners that have not completed the form are contacted through email, phone, or mail to notify them of non-compliance. If the vessel is still out of compliance, it is added to a list of non-compliant vessel owners which is then forwarded to NMFS for enforcement. For EDRs RAM withholds issuing quota share to entities that are out of compliance with the EDR requirements. For the Crew Data Collection an alternative method of enforcement would be necessary.

EDR crew licenses are not audited at this time. Depending on the uses of a broad crew data collection and the importance of precision needed it could be necessary to audit the crew licenses by verifying that reported crew licenses are valid and can be verified with ADF&G or CFEC. If the data is providing fleet-wide trends and an understanding of potential impacts of proposed Council action, unaudited data may be sufficient. Audited crew licenses would support additional efforts like disaster relief fund distribution and crew surveys. This audit process could be established similar to other audits of EDR data in the fall.

4.2.1.3 Enforcement

In order to have robust compliance with the data collection an appropriate enforcement mechanism must be established. For the current EDR programs, enforcement is tied to the issuance of quota share. If EDRs are not submitted, NMFS withholds the issuing of quota share the following year. Unless directed otherwise the enforcement tool for the current BSAI crab rationalization and BSAI Am 80 EDRs would stay in place resulting in a combination of enforcement tools.

For the new Crew Data Collection program, the enforcement mechanism might need to be different for different fleets. Similar to EDRs, either NMFS or the DCA would create an annual list of active vessels not in compliance with the crew data collection requirements. The persons out of compliance would be vessel owners that participated in a federal fishery in the federal waters off of Alaska that did not complete the annual crew data collection form. NMFS would review the list of non-compliant vessels and engage the chosen mechanism to promote compliance.

The AFA program, Pacific Cod Trawl Cooperative and Central Gulf Rockfish program all have a structure that would enable NMFS to require compliance prior to issuing quota share, as is done in the current EDRs. In total, 157 vessels could have a quota share issuance process that could be leveraged as an enforcement tool. The other 838 vessels, including vessels that participate in halibut/sablefish IFQ and CDQ programs, do not have an annual quota share application process associated with vessels and would need a different compliance approach.

One potential enforcement tool that could be applied universally or used in conjunction with quota share issuance would be requiring that vessels complete the Crew Data Collection form in order to receive a

[3] PSMFC's webpage provides access to EDR forms, submitter instructions, and validation audit reports https://www.psmfc.org/program/prog-2?pid=17

Federal Fisheries Permit (FFP). This option would only be available for vessels that attain an FFP. Vessels that operate only in state waters are not required to attain an FFP but often do. In 2023, 108 vessels held an FFP but did not operate in the EEZ.

One concern with leveraging FFPs is the triennial nature of FFPs issuance. NMFS or its DCA would create an annual list of non-compliant vessels. Situations would likely arise where a vessel was non-compliant in one of the previous three years and only complete the data collection upon applying for the FFP. This would result in a vessel owner completing the data collection for 2-3 years. It is also possible as vessels move in and out of the federal fisheries, gaps could occur in vessel participation and this could create complications in compliance management. For example, a vessel may participate in the federal fishery (2025) then participate in state waters only for two years (2026, 2027), choosing not to complete the crew data collection form. After the third year the vessel may choose to re-enter the federal waters (2028) at which time the vessel may not be able to accurately complete the data collection for 2025 and would be out of compliance to receive an FFP. This results in situations where either the FFP issuance is not fully effective for timely data and/or a complicated enforcement tool.

Other enforcement options would include setting up an additional permit or license tied to compliance with the data collection. This additional permit could be applied universally and also be available for vessels active only in state waters. However, developing a new permit would incur significant increased costs and burden to both NMFS and industry participants. The Council established a goal for the Crew Data Collection to limit the burden and costs of the program therefore developing a new permit has not been further analyzed and is not being considered.

4.2.1.4 Data Management and PRA Approval

The MSA sets forth confidentiality of information requirements at section 402(b), 16 U.S.C. 1881a(b). Under the MSA, the Secretary must maintain the confidentiality of any information that a person is required to submit in compliance with any regulation or requirement under the Act. The MSA defines person "as any individual (whether or not a citizen or national of the United States), any corporation, partnership, association, or other entity (whether or not organized or existing under the laws of any State), and any Federal, State, local, or foreign government or any entity of any such government." The MSA includes exceptions to confidentiality requirements and allow access to confidential information by specified entities. Federal employees and Council employees who are responsible for fishery management plan development, monitoring, or enforcement can have access to confidential data, provided that they treat the information as confidential. In addition, MSA specifies that confidential data can be released to Marine Fisheries Commission employees to "further the Department's mission." This access is subject to a confidentiality agreement that prohibits public disclosure of the identity or business of any person.

The crew data proposed under Alternative 2 would be confidential per the MSA requirements. NMFS would manage the crew data similar to other confidential fisheries data collected in Alaska (e.g., landing reports, logbooks) and the crew data could only be released in an aggregate or summary form that would not disclose the identity or business of the person who submitted the information. If NMFS were to work with PSMFC as a third-party data collection agent, PSMFC employees would have access to the crew data and be responsible for treating the data as confidential and aggregating and summarizing the information to avoid disclosing confidential information. Similar to other confidential data in NPFMC analyses, the crew data would show up as confidential in tables and figures unless aggregated.

The Paperwork Reduction Act (PRA) is a law governing how federal agencies collect information. Prior to implementing regulations requiring vessels to submit crew data, NMFS would have to seek PRA approval from the Office of Information and Regulatory Affairs, under the Office of Management and Budget. In the PRA review process NMFS must consider:

- What information is being collected;
- Who it is being collected it from;

- Why it is being collecting;
- What is the estimated burden cost, i.e., the time (in hours), financial considerations, and paperwork needed for the collection; and
- How the information will be used once it is collected.

As part of the PRA approval process, NMFS presents its estimation of the burden hours, which includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. NMFS also presents its estimation of the hourly cost. The public has an opportunity to comment and NMFS can update and revise burden and costs. In general, it takes six to nine months for PRA clearance, which includes time for public comment. The PRA process can also occur concurrently with the proposed and final rule process. As the crew data collection would be a new collection, NMFS would consider the most efficient way to complete the PRA approval process. In addition, changes to the EDRs would also require PRA approval. Each existing collection must be re-evaluated and seek PRA approval every 3 years, or sooner if changes are being proposed. Currently, the EDR programs each have separate PRA approvals that all expire on March 31, 2026.

4.2.1.5 Crew Data Collection Form

The proposed data collection fields have been included by section in the Appendix 1. Most sections of the form do not require input and are straight forward including: vessel information, crew compensation by type of positions, crew positions, and crew licenses.

Collecting data to be able to associate fishery participation with crew licenses is more nuanced and could be addressed multiple ways. Section 4 in the Appendix illustrates the different ways to address fishery participation. In all cases the crew members and compensation would be linked to the fisheries that the vessels participate in. From there, the methods have differing abilities to tease out crew that did not participate in all of the vessel's activity. Thus, the data collection methods have tradeoffs in respondent burden versus accuracy. The level of precision needed for this data collection, depends on intended uses.

The least burdensome method for respondents would be simply to include a list of crew licenses. Each crew member would be linked to all vessel activity in the given year. This "crew license only" method would be effective when crew members were active on the vessel for the entire time the vessel was active. It is the current methodology used for the Amendment 80 and Crab EDRs. When crew members have breaks in employment or are employed for a portion of a vessels activity the method does not account for the reduced period of employment.

License Only Method

Crew inclusion in the community impact analysis – if a vessel was active in the fishery of interest, all crew members on that vessel would be included

Crew compensation – Utilizes all crew members for all the days the vessel was active to calculate a daily crew pay and multiplies by the days the vessel was active in the analyzed fishery and applies it to each crew member.

- **Example:** $50,000 crew compensation, 5 crew members, 40 days of vessel activity, 30 days of halibut IFQ and 10 days of Open Access Pacific cod. If one crew member was from Homer and the analysis was for halibut IFQ it would be $50,000/200 crew days (5*40) multiplied by 30 days of halibut IFQ for $7,500 compensated to all 5 crew members.

A second method could require vessel owners to select the fishery that the specific crew member was active in. This could utilize check boxes for the paper form or drop-down boxes for an electronic form. This "check-box" method could allow for better identification of crew participation by fishery, as compared to the "crew license only" method. However, the "check-box" approach would still not account for periods of employment that are a portion of the vessel's total annual fishery activity. A crew member would be assumed to participate in the fishery for the entire year if a check box were selected.

Fishery Check Box Method

Crew inclusion in the community impact analysis – if a vessel was active in the fishery of interest and the crew member was identified as participating in that fishery through the check-box, crew members would be included

Crew compensation – Crew days would be calculated based on a fishery basis by the days the vessel was active and the crew members identified in a fishery multiplied by the days the vessel was active in the identified fishery and applied to crew members active in the identified fishery.

- **Example:** $50,000 crew compensation, 5 crew members, 40 days of vessel activity, 30 days of halibut IFQ and 10 days of Open Access Pacific cod, 1 crew member active only in halibut IFQ (Homer resident), 1 active only in Open Access Pacific cod and 3 crew members active for both. For halibut IFQ crew compensation it would be $50,000/160 crew days (3*40 + 1*10 + 1*30) multiplied by 30 days of halibut for $9,375. One crew member would have zero estimated compensation from halibut IFQ and the other 4 would have $9,375 (including Homer resident).

A third approach could be for vessel owners to enter begin dates/end dates for each crew member's participation. The "begin date/end date" method would require vessel owners to track the periods of employment by crew member and enter multiple licenses per crew member when there are breaks in the crew members' employment while the vessel was active. The "begin date/end date" would be linked to the vessel activity to determine the fishery that the crew member was active in and allow for greater detail in crew compensation by community. For example, if a crew member was active during a single trip the "check box" method would attribute an equal compensation to that crew members' community whereas the "begin date/end date" method would only attribute the compensation associated with the single trip to the crew member's community. There could be some cases where vessels utilize the same crew members throughout the season and operate in multiple fisheries and this "begin date/end date" method could be less burdensome than a "check-box" method. However, since the "begin date/end date" method would require more data entry, it would likely be the most burdensome approach. The "begin date/end date" approach would be expected to be the most accurate which also could potentially better support disaster relief fund distribution and quota share allocations to crew members.

Begin/End Date Method

Crew inclusion in the community impact analysis – if a vessel was active in the fishery of interest and the crew member was identified as participating on that vessel at the time, crew members would be included

Crew compensation – Crew days would be calculated on a daily basis using begin/end dates multiplied by the days the vessel was active in the identified fishery the applied to crew members.

- **Example:** $50,000 crew compensation, 5 crew members, 40 days of vessel activity, 30 days of halibut IFQ and 10 days of Open Access Pacific cod, 1 crew member active only in halibut IFQ for 25 days (Homer resident), 1 active only in Open Access Pacific cod for 10 days and 3 crew members active for 30 days. For Homer crew member it would be $50,000/125 crew days (3*30 + 1*10 + 1*25) multiplied by 25 days of halibut IFQ for $10,000 compensated to Homer resident. One crew member would have zero estimated compensation from halibut IFQ, 3 would have $12,000.

4.2.2 Potential Benefits

The collection of detailed crew information offers a range of benefits. By integrating crew data into initiatives, the Council could support more informed decision-making, improve fishery management practices, and promote the well-being of fishing communities. The benefits associated with the data collection can be grouped into two broader categories, analytical benefits and facilitator benefits. The analytical benefits are directly associated with the data collection and require program administration and data management to implement. The facilitator benefits would not be directly realized with the data collection however benefits could occur in conjunction with other efforts.

The foremost analytical benefit would be the community impacts section of analytical documents. The crew data collection could change the way in which analytical documents presented to the Council were completed. Analysts could integrate the crew data into program reviews and analytical documents as soon as a time series was available. Analytical tools and products would also benefit from crew data such as the Groundfish Economic SAFEs and Annual Community Engagement and Participation Overview (ACEPO).

The facilitator benefits would include the ability to contact crew and enable research and analysis utilizing crew data. These efforts may include disaster relief funding distribution, crew research initiatives, community resilience programs and evaluating crew quota. Although the crew data collection in of itself is not intended to support these efforts it would provide the structure to evaluate these types of approaches. Disaster relief funding may be the most significant use of crew data with immediate and direct economic benefits. Crew data would provide an avenue to notify crew members that they may be eligible for disaster relief funding either through an application or to verify information provided by vessel owners. If the intent is to provide a data source to facilitate these types of efforts, it may be necessary to audit the crew data. Prior EDR collections contain unverified crew identifiers.

4.2.2.1 Community Impact Assessment

Detailed crew data allows for a more comprehensive understanding of the socioeconomic conditions of fishing communities. This information can be used to assess the broader economic impact of fisheries on local economies and the well-being of residents. Community fishery engagement and dependency is often a critical piece of analytical documents reviewed by the Council. Crew data provides a more robust picture of the communities involved in a fishery and the impacts that may occur with changes to the fishery. In the case of BSAI crab rationalization and BSAI Am 80 EDR compliant fisheries, the crew data is leveraged to show the communities that crew reside in and the estimated compensation that flows into those communities via crew. See, for example, tables included in the Social and Community section of the June 2024 Crab Program Review beginning on page 142. The BSAI Crab Program requires vessel owners to submit crew data and provides an example of how crew data would change community impact assessments. When crew data is not collected, the community impacts relies solely on the vessel owner's residence as seen in Table 2.

Table 2 Catcher Vessels Harvesting Rationalized Crab by Community of Vessel Historic Ownership Address, 1998-2022(number of vessels)

Community	1998-2005 Avg	2006-2010 Avg	2011-2015 Avg	2016	2017	2018	2019	2020	2021	2022	Annual Average 2016-2022 (number)	Annual Average 2016-2022 (percent)	Unique Vessels 2016-2022 (number)
Anchorage/Wasilla	6.9	5.6	7.8	7	6	6	6	5	9	7	6.6	10.00%	11
Homer/Seldovia*	9.1	4.8	6	8	4	4	4	4	4	2	4.3	6.52%	8
Kodiak	33.9	11.6	8.2	8	8	7	7	7	7	4	6.9	10.43%	10
Southeast**	6.1	1.2	0	0	0	0	0	0	0	0	0.0	0.00%	0
Southwest***	8.6	0.6	0	0	0	0	0	0	0	0	0.0	0.00%	0
Alaska	64.6	23.8	22	23	18	17	17	16	20	13	17.7	26.96%	28
Oregon	21.3	10.2	9.8	10	10	9	9	7	7	5	8.1	12.39%	10
Seattle MSA	136.1	46.4	40	42	37	35	36	36	32	27	35.0	53.26%	45
Other WA	18.5	4.6	4.4	5	5	4	3	2	3	3	3.6	5.43%	8
Washington	154.6	51	44.4	47	42	39	39	38	35	30	38.6	58.70%	52
Other States	6.1	1.2	1.2	1	1	1	0	2	2	2	1.3	1.96%	2
Total	246.6	86.2	77.4	81	71	66	65	63	64	50	65.7	100.00%	86

Source: ADFG/CFEC Fish Tickets, data compiled by AKFIN in Comprehensive_FT

* Homer/Seldovia includes: Anchor Point, Homer, Kenai, Seldovia and Seward

**Southeast includes: Cordova, Ketchikan, Petersburg, Sitka, Yakutat

***Southwest includes:Akutan, Unalaska/Dutch Harbor, King Cove, and Sand Point

For comparison, Table 3 below represents the number of crew licenses by community that were active on vessels harvesting rationalized crab. From 2012-2022, crew members represented 948 communities of which 107 were in Alaska. During the same time frame, vessel owners represented 39 communities, of which 6 were in Alaska. **The numerous communities in Table 3 compared to the relatively few communities in Table 2 is a likely scenario that would be seen across all fisheries with crew members having a much larger footprint than vessel owners.** Crew residing in Alaska made up 31% of total participation compared to vessel owners making up 27%. Communities outside of Alaska, Washington, and Oregon made up 27% of crew and just 2% of vessel ownership. Higher crew participation outside Alaska, Washington and Oregon may be a common trend or may be specific to the crab fishery. Due to the lack of crew data the actual residence of crew by fishery is unknown outside of the BSAI crab rationalization and BSAI Am 80 fisheries. It is possible that the crab fishery draws more crew members from other states than is typically seen.

Table 3 Crew Members Harvesting Rationalized Crab by Community of Crew Address, 2012-2022 (number of licenses)

	Community	2012-2015 Avg	2016	2017	2018	2019	2020	2021	2022	Annual Average 2016-2022 (number)	Annual Average 2016-2022 (percent)
	Anchorage MSA	48.8	42	35	37	45	33	43	25	37.1	6.56%
	Dutch Harbor/Unalaska	23.8	20	12	18	19	3	14	14	14.3	2.52%
	Homer/Seldovia	34.0	27	22	24	26	18	29	12	22.6	3.98%
	Kenai/Soldotna/Sterling	7.0	7	6	5	8	10	5	4	6.4	1.13%
	King Cove	4.5	9	6	9	6	3	10	3	6.6	1.16%
	Kodiak	75.0	60	62	54	50	24	36	23	44.1	7.79%
	Sitka	5.3	3	2	1	3	18	1	0	4.0	0.71%
	Petersburg	1.0	3	3	4	4	14	2	3	4.7	0.83%
Other AK	Akutan	1.8	3	0	1	0	0	0	0	0.6	0.10%
Other AK	Chevak	1.5	1	0	0	1	1	0	0	0.4	0.08%
Other AK	Cordova	2.5	1	6	5	1	5	3	3	3.4	0.61%
Other AK	Dillingham	1.5	0	0	0	0	10	0	0	1.4	0.25%
Other AK	Fairbanks	1.3	1	0	0	0	4	0	1	0.9	0.15%
Other AK	Haines	0.8	0	1	1	1	3	0	0	0.9	0.15%
Other AK	Juneau/Douglas/Auke Bay	0.3	0	1	0	0	12	0	0	1.9	0.33%
Other AK	Ketchikan	1.0	1	2	2	2	5	1	0	1.9	0.33%
Other AK	Ninilchik	0.5	1	2	1	1	1	1	0	1.0	0.18%
Other AK	Saint Paul Island	1.3	1	1	2	1	0	1	1	1.2	0.21%
Other AK	Sand Point	2.3	2	2	2	5	2	3	3	2.7	0.48%
Other AK	Seward	0.8	2	2	1	3	2	1	1	1.7	0.30%
Other AK	Toksook Bay	2.8	1	2	0	0	2	0	0	0.7	0.13%
Other AK	Valdez	1.5	2	1	1	1	2	1	1	1.3	0.23%
Other AK	Wrangell	0.3	2	2	2	1	6	0	0	1.9	0.33%
Other AK	Other AK	16.8	10	7	7	4	54	7	4	13.3	2.34%
Other AK	Other AK Total	37.0	30	31	25	21	110	20	16	36.1	6.38%
	Alaska	236	201	179	177	182	233	160	100	176.0	31.06%
	Newport	9.8	17	10	8	6	2	9	7	8.4	1.49%
	Other WA	58.3	55	43	46	50	19	59	28	42.9	7.56%
	Oregon	68.0	72	53	54	56	21	68	35	51.3	9.05%
	Seattle MSA	178	172	157	140	129	77	105	70	121.4	21.43%
	Other WA	98.3	88	70	70	65	66	42	37	62.6	11.04%
	Washington	276.5	260	227	210	194	143	147	107	184.0	32.48%
	Other States	153	201	148	141	167	175	141	114	155.3	27.41%
	Total	734	734	607	582	599	572	516	356	566.6	100.00%

Source: Economic Data Reports, data compiled by AKFIN

The difference between understanding a community footprint with and without crew data and not having crew data available could be further highlighted via the community of Dutch Harbor/Unalaska in Table 3 compared to Table 2. No Dutch Harbor/Unalaska community participation by vessel owner residence is shown in Table 2, for fisheries without crew data this would be the extent of the Council's knowledge of harvester participation in Federal fisheries connected to Dutch Harbor/Unalaska. However, in Table 3, 14 crew members are seen to be active in 2022 with an average of 14.3 crew members participating from 2016-2022. This equates to 2.5% of all crew members in the crab fishery residing in Dutch Harbor/Unalaska.

Another layer of understanding impacts to communities would be through crew compensation which could be analyzed through the Dutch Harbor/Unalaska example. In Table 4 Dutch Harbor/Unalaska has an average annual estimated crew compensation of $1.34 million dollars in the Rationalized crab fisheries from 2016-2022. Looking at the size and opportunities in the community of Dutch Harbor/Unalaska one may gauge the importance of the fishery to the community. In the cases where crew data is not available the dependence of Dutch Harbor/Unalaska on the harvesting sector would be assumed to be null.

In 2021, crew compensation accounted for 23% of gross revenue per the 2022 Crab Economic SAFE. Utilizing similar information as Table 4 below, analytical documents would estimate how that portion of revenue impacts communities.

Table 4 Crew Compensation by Community of Crew Address, 2012-2022 (millions of 2022 dollars)

Community	2012-2015 Avg	2016	2017	2018	2019	2020	2021	2022	Annual Average 2016-2022 (millions)	Annual Average 2016-2022 (percent)
Anchorage Msa	3.97	3.36	2.13	2.15	3.91	3.03	5.06	1.74	3.05	6.59%
Dutch Harbor/Unalaska	1.96	1.35	1.34	1.26	1.65	0.30	2.52	0.98	1.34	2.90%
Homer/Seldovia	2.41	2.50	1.91	1.58	2.19	2.01	2.73	0.83	1.96	4.24%
Kenai/Soldotna/Sterling	0.49	0.65	0.28	0.30	0.49	0.85	0.86	0.71	0.59	1.28%
King Cove	0.31	0.56	0.24	0.54	0.41	0.21	0.90	0.10	0.42	0.91%
Kodiak	5.33	3.75	3.19	2.42	2.72	1.42	2.42	0.85	2.39	5.17%
Petersburg	*	0.32	*	*	0.32	1.53	*	0.22	0.43	0.94%
Sitka	*	0.21	*	*	0.10	1.44	*	0.00	0.28	0.60%
Other Ak	3.02	2.79	2.28	1.49	1.43	8.51	2.28	0.75	2.79	6.03%
Alaska	17.99	13.61	10.62	7.95	10.88	15.95	15.62	5.00	11.38	24.58%
Newport	1.11	2.11	1.60	1.09	1.12	*	2.14	0.90	1.31	2.82%
Other OR	5.16	4.92	3.70	3.67	5.60	*	7.20	1.96	4.02	8.67%
Oregon	6.27	7.03	5.29	4.75	6.72	1.25	9.34	2.87	5.32	11.49%
Seattle MSA	15.95	15.07	11.12	9.71	10.17	6.78	13.56	3.33	9.96	21.52%
Other WA	9.66	8.68	6.11	6.38	5.95	5.75	6.63	2.35	5.98	12.91%
Washington	25.61	23.75	17.23	16.09	16.12	12.53	20.19	5.67	15.94	34.43%
Other States	12.59	17.85	11.40	10.44	13.01	19.67	17.07	6.15	13.66	29.50%
Total	62.45	62.24	44.54	39.24	46.74	49.39	62.21	19.70	46.29	100.00%

Source: Economic Data Reports, data compiled by AKFIN

Currently, without any information about crew, the vessel owner's address is relied upon to analyze community participation when crew data is not available. However, the correlation between vessel owners' address and crew members' address residence is weak. In order to illustrate the tenuous relationship between crew member residence and vessel ownership Table 5 from the Crab Program Review has been provided. Oregon shows the least amount of correlation with just 1 of the 73 crew members on vessels owned by Oregon residents coming from Oregon. Homer/Seward represented the most correlation with 26% or 7 of 27 crew members on Homer/Seward owned vessels residing in from Homer/Seward.

Table 5. Vessel Owner Address by Crew Address for Vessels Harvesting Rationalized Crab, 2020

		Vessel Owner Address							
		Anchorage/Wasilla	Homer/Seward	Kodiak	Oregon	Seattle	Other Washington	Other States	Grand Total
Crew Address	Anchorage Msa	5	4	8	5	14	0	0	36
	Chevak	1	0	0	0	0	0	0	1
	Cordova	0	2	0	0	3	0	0	5
	Dillingham	3	3	0	1	3	0	0	10
	Dutch Harbor/Unalaska	0	0	0	0	3	1	0	4
	Fairbanks	0	0	0	1	3	0	0	4
	Haines	2	0	0	0	1	0	0	3
	Homer/Seldovia	1	7	0	1	9	3	0	21
	Juneau/Douglas/Auke Bay	0	1	2	2	8	0	0	13
	Kenai/Soldotna/Sterling	2	0	1	3	4	0	1	11
	Ketchikan	1	1	0	0	4	0	0	6
	King Cove	0	0	0	1	2	0	0	3
	Kodiak	0	1	11	4	6	2	0	24
	Ninilchik	0	0	0	0	1	0	0	1
	Nome	0	0	0	0	1	0	0	1
	Petersburg	2	0	2	0	14	0	0	18
	Sand Point	1	0	0	0	2	0	0	3
	Seward	0	0	0	0	2	0	0	2
	Sitka	1	0	3	2	10	1	2	19
	Toksook Bay	0	0	1	0	1	0	0	2
	Valdez	1	0	0	0	1	0	0	2
	Wrangell	0	0	1	2	3	0	0	6
	Other Ak	5	3	3	8	32	4	1	56
	AK	25	22	32	30	127	11	4	251
	Newport	0	0	0	0	2	0	0	2
	Other Oregon	1	0	3	1	11	1	3	20
	OR	1	0	3	1	13	1	3	22
	Seattle	12	1	4	16	44	0	4	81
	Other Washington	12	2	5	10	35	3	1	68
	WA	24	3	9	26	79	3	5	149
	Other States	35	2	16	16	107	9	1	186
	Grand Total	85	27	60	73	326	24	13	608

Source: Economic Data Reports, data compiled by AKFIN

Vessel owner information would continue to be included as a vital piece of community impacts assessments however crew residency and crew compensation information is clearly a valuable additional data source to understand community impacts. These additional dimensions allow analysts to better describe the recent trends and current state of participation in federal fisheries, but also to better predict the scope of potential impacts from a Council decision.

4.2.2.2 Improved Disaster Relief Fund Distribution

There are many ways in which the federal government can support communities and individuals when a disaster occurs. This section is focused on economic assistance associated with fishery disasters. Effective disaster relief fund allocation and distribution can be crucial to support the fishing industry and its workers during crises. The lack of comprehensive crew data can pose a significant barrier to equitable fund distribution to all impacted parties. Systematic crew data collection could potentially improve disaster relief distribution by ensuring that funds reach those affected and supporting the resilience of fishing communities. Disaster relief funds in the fishing industry are typically distributed through a series of steps that involve federal, state, and sometimes local agencies. Crew members are often contacted by word of mouth or vessel owner identification. Systematic crew data collection could improve the process by identifying employment on a vessel that could then be utilized to contact active members. Below is an overview of the current process:

Declaration of Disaster

- Disaster Request: The process begins with the recognition of a disaster event, such as a fishery collapse. An eligible entity, such as the Governor of Alaska, requests a fishery resource disaster determination from the Secretary of Commerce (Secretary).
- Assessment: NOAA in collaboration with ADF&G and other relevant agencies, assesses available information to determine the extent of the damage and the economic impact on the fisheries and the communities dependent on them.
- Disaster Determination: The Secretary determines whether the fishery resource disaster request is consistent with Magnuson-Stevens Fishery Conservation and Management Act (MSA) and warrants a positive fishery resource disaster determination.

Fund Allocation

- Federal Funding: Once a disaster is determined, the U.S. Congress may appropriate funds for disaster relief. NOAA typically manages these funds through the National Marine Fisheries Service (NMFS).

Distribution Plan

- Development of a Spend Plan: The state, in consultation with NOAA, develops a detailed spend plan for the distribution of funds. This plan outlines specific funding categories such as research, communities, harvesters, and processors. The spend plan establishes eligibility criteria for individuals and entities affected by the disaster. This typically includes vessel owners, processors, and sometimes crew members, depending on the nature of the disaster and the available data.
- Public Input: The proposed spend plan is posted for one or more public comment periods to ensure transparency and incorporate feedback from the affected participants.

Fund Distribution

- Application Process: Eligible recipients must apply for disaster relief funds. The current process relies on vessel owners or word of mouth to notify crew members they may be eligible. The application process requires documentation of losses, which can include catch records, income statements, and proof of employment. For crew members application often includes a completed form with an affidavit or crew contracts/settlements.
- Review and Approval: Applications are reviewed by the administering agency, which verifies the information and approves the disbursement of funds.

Challenges in Distribution to Crew Members

- Documentation and Verification: Crew members must provide documentation to verify their eligibility. This may include formal contracts, detailed records of their earnings and employment or an affidavit from the vessel owner or captain.
- Data Gaps: Limited data on crew members' economic dependence on specific fisheries makes it challenging to assess their losses accurately.
- Equity and Fairness: Ensuring equitable distribution of funds is difficult due to the varied nature of employment arrangements and the different levels of impact on crew members.

Effective distribution of disaster relief funds to crew members could benefit from the crew data collection program. The amount of crew compensation associated with a fishery could be estimated and the crew members participating in the fishery would be known. Currently crew participation on vessels is not consistently collected across vessels resulting in an approach that does not include systematic or verifiable crew information. Due to the lack of crew participation data the identification of eligible crew for distribution of disaster relief funds to crew members is often reliant on word of mouth information provided by vessel owners. By implementing the Crew Data Collection, the Council may help disaster relief funds be distributed more efficiently and fairly. If the intention of the data collection is to support these efforts it is likely important to audit the crew licenses, which is not done in the current EDR efforts. Utilizing a begin date/end date as part of the crew data collection form may have an additional benefit of approximating the amount of participation each crew member had supporting equitable distribution.

4.2.2.3 Other Benefits

The Crew Data Collection would enhance and serve as a supportive tool for additional research, analytical products and initiatives. The data collected would provide an avenue for direct crew surveys, and enable analysis of crew quota and other potential programs that could support crew and the communities that crew reside in. Examples of programs that could be developed include workforce development, economic support and community engagement. Surveys could also be leveraged to provide deeper insights into the status of crew like crew tenure or crew satisfaction. Below is short overview of other potential benefits or ways in which crew data could be leveraged.

Analytical Products

- Groundfish Economic SAFEs: The Economic SAFEs would include crew employment and crew compensation information for groundfish.
- Community Profiles: Integrating crew data into the Annual Community Engagement and Participation Overview (ACEPO) could enhance the community profiles, providing a more complete picture of community involvement in fisheries and how benefits (in the form of

employment and labor payments) are distributed across communities. This supports better-targeted community engagement and participation initiatives.

Research

- Labor Market Dynamics: Understanding the labor market dynamics within the fishing industry, including turnover rates, job satisfaction, income, employment patterns and employment trends, can inform policies aimed at improving job security and working conditions. Additional survey work would be needed.
- Industry Stability: Understanding the workforce dynamics and economic dependencies within the fishing industry supports the development of strategies that enhance industry stability and resilience.
- Robust Data Sets: Collecting crew data contributes to the creation of robust data sets that support longitudinal studies, enabling researchers to track changes and trends over time and assess the long-term impacts of management decisions.

Initiatives

- Community Support Programs: Data on crew members can inform the creation of community support programs that address broader social and economic issues, such as healthcare, education, and housing to contribute to the overall resilience and well-being of fishing communities.
- Crew Quota Programs: Crew participation data could be leveraged to develop quota opportunities to crew members by fishery and level or participation.

4.2.3 Potential Costs

There are direct costs associated with implementing the data collection that would be borne by industry and NMFS. The costs to NMFS for the data collection are estimated at $133,000 the first year, decreasing to $110,000 for the following years. Additional burden for NMFS, not accounted for in this calculation would be the enforcement and compliance mechanism, which could be a substantial burden for agency staff. The cost to industry to complete the annual data collection is an estimated $145,500. The administrative costs are associated with the build and maintenance of the data collection infrastructure that includes the personnel maintaining the program. The industry costs would be associated with the costs of completing annual forms and retaining records associated with crew participation.

4.2.3.1 Administrative Costs

The costs associated with the administration of the Crew Data Collection would be dependent on the way NMFS proceeds with implementation. The EDR data collections have been a collaborative effort that relies significantly on staff support from AFSC and Pacific States Marine Fisheries Commission (PSMFC) as the third-party Data Collection Agent (DCA). Leveraging the existing data collection methodology developed for EDRs is likely the most cost-effective way to administer the proposed data collection. AFSC and PSMFC have built infrastructure and institutional knowledge to manage the current and previous EDRs. This infrastructure includes web applications, database structure, auditing capabilities and staff support. There are also economies of scale that would make the data collection more expensive if a new administrative structure or DCA were to be chosen.

Table 6 below outlines the historic administrative costs associated with EDR data collection. The costs reached a high point in 2016 of $708,610 in 2023 dollars. Since that time costs have declined in large part due to the removal of third-party audits of the Crab EDR data. In 2023, the total program costs were $339,530. The costs associated with 2021-2023 likely represent costs associated with maintaining personnel and infrastructure that has been developed over time and could be considered a baseline cost.

Table 6 PSMFC Administrative Costs of the EDR Programs

Year	Crab[1]	A80	AFA[2]	GOA Trawl	Total EDR cost	EDR cost in 2023 dollars
2005	$150,000				$150,000	$224,958
2006	$150,000				$150,000	$218,169
2007	$259,938				$259,938	$368,101
2008	$338,276				$338,276	$470,184
2009	$314,303				$314,303	$434,005
2010	$352,508				$352,508	$480,992
2011	$323,588				$323,588	$432,613
2012	$373,316				$373,316	$489,936
2013	$318,278				$318,278	$410,610
2014	$342,703				$342,703	$434,555
2015	$269,583			$53,771	$323,354	$406,477
2016	$345,509	$88,254	$62,114	$73,221	$569,098	$708,610
2017	$180,168	$91,482	$66,929	$91,879	$430,458	$526,379
2018	$202,012	$92,462	$40,631	$61,765	$396,870	$474,442
2019	$180,224	$87,644	$56,989	$57,486	$382,343	$449,525
2020	$91,620	$72,976	$48,194	$107,459	$320,250	$371,526
2021	$72,927	$85,123	$52,735	$73,240	$284,026	$315,113
2022	$97,913	$80,256	$64,205	$78,651	$321,025	$332,691
2023	$145,209	$130,943	$63,378	$0	$339,530	$339,530

Source: Pacific States Marine Fisheries Commission (2024)

1 Reflects the first year of the crab fishing season.

2 Only includes costs associated with the inshore sector

The funding vehicle for the EDR program is the PSMFC Data Collection Grant from NMFS, which is reauthorized on a four-year basis and serves as the repository for annual transfers of funds from two sources: cost recovery funds associated with the LAPPs of which the current EDRs are elements, and annual allocations of commercial fishery data collection funds distributed by NMFS Office of Science and Technology/Economics and Social Science (ST5). AFSC jointly manages the grant with PSMFC and oversees PSMFCs scope of work for each of the EDR projects. PSMFC submits cost recovery expenditure reports to AKRO, which recovers the expended funds through cost recovery when available and transfers the recovered funds to the grant. For the portions of the EDR program that are not eligible for cost recovery (the AFA At-Sea Sector portion of the Amendment 91 Chinook Salmon EDR, and until 2022, the GOA Trawl EDR), AKRO requests funds from ST5. Because the Crew Data Collection would not be an element of a LAPP under federal fishery regulations, cost recovery would not be a permissible means of funding the collection. Unless an alternative funding source is identified, it would likely be wholly reliant on funding from NMFS ST5 and the competitive process for allocating commercial fishery data collection funds across NMFS regions.

The Crew Data Collection would require upfront expenditures and long-term costs to maintain the collection. The upfront costs would largely be comprised of database design, paper form creation, and web application build (if there is an electronic format for submission). If NMFS decided to have PSMFC administer the program, PSMFC estimates that the upfront expenditures would be $23,000. There could also be expenditures associated with a re-design of duplicative EDRs (BSAI crab rationalization and BSAI Am 80) to match the data components outlined. The BSAI crab rationalization and BSAI Am 80 EDR redesign is likely to be a minimal expense and not require additional funding. It should also be noted that the initial one or two years of the data collection will require substantially greater staff time, both for PSMFC as well as AFSC (if the latter is engaged in the project in a capacity similar to its role in the EDR

program), to provide user support to individual submitters and develop and implement data validation protocols. These costs are uncertain and not included in the $23,000.

The recurring administrative expenditures for the new data collection are estimated at $110,000. This estimate includes salary, benefits, and wages for staff to support the data collection. The mailing of forms is estimated to cost $10,000 annually. The estimate is based on 1,031 vessels. The removal of vessels active only in state waters would reduce the costs associated with the data collection however, due to the unknown influx of vessels participating in the Upper Cook Inlet Salmon fishery in the EEZ off of Alaska, a new estimate was not developed at this time.

4.2.3.2 Costs to Data Collection Respondents

To estimate the cost to the industry two pieces of information must be attained, the cost per hour to complete the form and the hours needed to complete it. To estimate the costs to the industry, a previous Regulatory Impact Review (RIR) was used that evaluated the benefits and costs of EDRs (NMFS 2022) The low estimate for cost per hour to complete the EDR form was $37 per hour. This estimate is an average hourly estimate used for forms and components in most of NMFS' information collections and assumes that information is being submitted by operators of small vessels or administrative or management staff in processing plants or fishing companies. The upper estimate for the hourly expense identified for EDRs was $165 per hour for the crab EDR and $75 per hour for the AFA EDR based on comments received on past EDR renewals. As described in section 4.2.1.1, part of the Paperwork Reduction Act (PRA) approval process, NMFS presents its burden hour and hourly cost estimates for public comment and generally updates and revises them if it receives information that supports doing so. The new data collection would likely require less expertise than both the A91 EDR, which leverages skipper information, and the Crab EDR and would be in line with systematic data collection that are estimated to cost $37 per hour. However, this analysis uses $75 per hour as many vessel owners would likely be completing the form directly.

The previous EDR Analysis (NMFS 2022) also reviewed the time burden associated with completing the applicable forms. The Amendment 80 EDR is estimated to take 22 hours and the Crab EDR is estimated to take 20 hours while the Gulf of Alaska Trawl EDR form was estimated to take 15 hours. The Crew Data Collection outlined in this action would be expected to be less burdensome than current EDR forms. The proposed data fields are significantly fewer and focus on crew information (Appendix 1). Fields required in the EDRs such as cost/gallon for fuel and fishing gear costs require record keeping out of the ordinary business practices while crew compensation and active crew members on a vessel should be more readily available information. Due to the nature of the proposed data collection, the burden hours may vary between vessel types. For example, in 2023 catcher processors are estimated to have an average crew size of 43 while the halibut IFQ sector is estimated to have an average of 4 crew members at one time. Catcher processors are not required to have crew licenses for processing crew but having licenses may provide flexibility and would be encouraged under this collection. Therefore, the form may take several hours for a catcher processor while taking significantly less time for small vessels that have fewer crew.

The estimated cost to industry excludes vessels currently required to submit EDRs. Using an estimate of 6 hours per catcher processor (13 AFA Catcher Processors and 20 Freezer Long-liners) and 3 hours for all other vessels (580) at the $75 per hour rate, the burden of reporting for vessels is estimated at $145,500 for an industry cost of $237 per form per vessel.

4.3 Summary of Alternatives

Alternative 1 of this action would maintain collection of crew data for a small portion of vessels active in the federal fishery of Alaska, 59 of 1032 vessels or specifically the vessels that participate in the Amendment 80 or Crab Rationalization programs. For the remainder of vessels crew members would be unidentifiable. Community impact assessment would rely on vessel owner information for the harvesting sector which provides an incomplete description of the interactions between communities and the fishing industry.

Alternative 2 would require vessel owners that participate in the federal fishery in the EEZ off of Alaska to complete an annual data collection focused on crew information. The crew data collection would affect 672 vessels in 2023 of which 59 currently complete similar data collections associated with Amendment 80 or Crab Rationalization programs EDRs. The new data collection would create an increased burden on both industry and NMFS. Direct costs associated with the data collection are estimated to be $278,500 in the first year, decreasing to $250,500 in following years. NMFS would also have an increased burden associated with enforcing compliance with the data collection. While the upfront and re-occurring costs of implementing the crew data collection are significant, they are countered by the long-term benefits to decision-making and the initiatives that could be facilitated by recognizing crew members. Decision making would benefit from more inclusive community impact assessments. The comprehensive understanding gained from crew data would support policies that are more equitable, effective, and aligned with the long-term sustainability of both the fishing industry and the communities it supports. Efforts that would be facilitated by identifying crew member may also include improved information used to inform disaster relief fund distribution, direct crew surveys, crew quota and programs that support crew and the communities that crew reside in.

4.4 Affected Small Entities (Regulatory Flexibility Act Considerations)

This section will be completed for the final action draft if the Council moves forward with consideration of the action alternatives.

4.5 Net Benefit to the Nation

This section will be completed for the final action draft if the Council moves forward with consideration of the action alternatives.

5 Magnuson-Stevens Act and FMP Considerations

5.1 Magnuson-Stevens Act National Standards

Below are the 10 National Standards as contained in the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act). In recommending a preferred alternative at final action, the Council must consider how to balance the national standards.

A brief discussion of this action with respect to each National Standard will be prepare for final action.

National Standard 1 — Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the United States fishing industry.

National Standard 2 — Conservation and management measures shall be based upon the best scientific information available.

National Standard 3 — To the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.

National Standard 4 — Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various United States fishermen, such allocation shall be; (A) fair and equitable to all such fishermen, (B) reasonably calculated to promote conservation, and (C) carried out in such a manner that no particular individual, corporation, or other entity acquires an excessive share of such privileges.

National Standard 5 — Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources, except that no such measure shall have economic allocation as its sole purpose.

National Standard 6 — Conservation and management measures shall take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches.

National Standard 7 — Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.

National Standard 8 — Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of National Standard 2, in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities.

National Standard 9 — Conservation and management measures shall, to the extent practicable, (A) minimize bycatch, and (B) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch.

National Standard 10 — Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.

5.2 Section 303(a)(9) Fisheries Impact Statement

Section 303(a)(9) of the Magnuson-Stevens Act requires that a fishery impact statement be prepared for each FMP or FMP amendment. A fishery impact statement is required to assess, specify, and analyze the likely effects, if any, including the cumulative conservation, economic, and social impacts, of the conservation and management measures on, and possible mitigation measures for (a) participants in the fisheries and fishing communities affected by the plan amendment; (b) participants in the fisheries conducted in adjacent areas under the authority of another Council; and (c) the safety of human life at sea, including whether and to what extent such measures may affect the safety of participants in the fishery.

The EA/RIR prepared for this plan amendment constitutes the fishery impact statement. The likely effects of the proposed action are analyzed and described throughout the EA/RIR. The effects on participants in the fisheries and fishing communities are analyzed in the Chapter 4. There are no effects of the proposed action on safety of human life at sea. Based on the information reported in this section, there is no need to update the Fishery Impact Statement included in the FMP.

The proposed action affects the groundfish fisheries in the EEZ off Alaska, which are under the jurisdiction of the North Pacific Fishery Management Council. Impacts on participants in fisheries conducted in adjacent areas under the jurisdiction of other Councils are not anticipated as a result of this action.

5.3 Council's Ecosystem Vision Statement

In February 2014, the Council adopted, as Council policy, the following:

Ecosystem Approach for the North Pacific Fishery Management Council

Value Statement

The Gulf of Alaska, Bering Sea, and Aleutian Islands are some of the most biologically productive and unique marine ecosystems in the world, supporting globally significant populations of marine mammals, seabirds, fish, and shellfish. This region produces over half the nation's seafood and supports robust fishing communities, recreational fisheries, and a subsistence way of life. The Arctic ecosystem is a dynamic environment that is experiencing an unprecedented rate of loss of sea ice and other effects of climate change, resulting in elevated levels of risk and uncertainty. The North Pacific Fishery Management Council has an important stewardship responsibility for these resources, their productivity, and their sustainability for future generations.

Vision Statement

The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats.

Implementation Strategy

The Council intends that fishery management explicitly take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, fluctuations in productivity for managed species and associated ecosystem components,

such as habitats and non-managed species, and relationships between marine species. Implementation will be responsive to changes in the ecosystem and our understanding of those dynamics, incorporate the best available science (including local and traditional knowledge), and engage scientists, managers, and the public.

The vision statement shall be given effect through all of the Council's work, including long-term planning initiatives, fishery management actions, and science planning to support ecosystem-based fishery management.

In considering this action, the Council is being consistent with its ecosystem approach policy.

6 Preparers and Persons Consulted

Preparers

Michael Fey, PSMFC/AKFIN

Contributors

Sarah Marrinan, NPFMC

Stephanie Warpinski, NMFS AKRO

Jennifer Mondragon, NMFS AKRO

Brian Garber-Yonts, AFSC

Persons and Agencies Consulted

Caren Braby, PSMFC

Brian Bissel, PSMFC

Brian Brown, NMFS AKRO

Jean Lee, PSMFC/AKFIN

7 References

NPFMC (North Pacific Fisheries Management Council). 2022. EDR Analysis. February, 2022. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=bcbe6d59-01b6-4852-adc0-41b1f54e6bf5.pdf&fileName=C1%20EDR%20Analysis.pdf

NPFMC (North Pacific Fisheries Management Council). 2022. Universal Data Collection. October, 2022. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=0ff07986-e6e1-4b20-b0d3-62aeb323ea54.pdf&fileName=D3%20Universal%20Data%20Collection%20Components%20Discussion%20Paper.pdf

NPFMC (North Pacific Fisheries Management Council). 2023. Universal Data Collection. February, 2023. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=9409e0da-1e1a-4e07-9654-1b49cafebac6.pdf&fileName=D5%20Universal%20Data%20Collection%20Discussion%20Paper.pdf

NPFMC (North Pacific Fishery Management Council). 2023. Crab Economic SAFE 2022. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: https://meetings.npfmc.org/CommentReview/DownloadFile?p=398785e2-d50b-49f4-bb64-c5f4834a93d1.pdf&fileName=D4%20Crab%20Economic%20SAFE%202022.pdf

NMFS. 2004. Programmatic Supplemental Environmental Impact Statement for the Alaska Groundfish Fisheries Implemented Under the Authority of the Fishery Management Plans for the Groundfish Fishery of the Gulf of Alaska and the Groundfish of the Bering Sea and Aleutian Islands Area. NMFS Alaska Region, P.O. Box 21668, Juneau, AK 99802-1668. June 2004. Available at: https://alaskafisheries.noaa.gov/fisheries/groundfish-seis

NMFS. 2022. Final Regulatory Impact Review for Revisions to Federal Regulations to Economic Data Reporting Requirements for Groundfish and Crab Fisheries off Alaska and Amendment 52 to the Fishery Management Plan for Bering Sea/Aleutian Islands King and Tanner Crabs. NMFS Alaska Region, P.O. Box 21668, Juneau, AK 99802-1668. Available: https://repository.library.noaa.gov/view/noaa/48866

NMFS. 2007. Environmental impact statement for the Alaska groundfish harvest specifications. January 2007. National Marine Fisheries Service, Alaska Region, P.O. Box 21668, Juneau, Alaska 99802-1668. Available: http://www.alaskafisheries.noaa.gov/index/analyses/analyses.asp.

NPFMC (North Pacific Fishery Management Council). 2023. Stock Assessment and Fishery Evaluation Report for the Groundfish Resources of the Bering Sea/Aleutian Islands Regions. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: http://www.npfmc.org/safe-stock-assessment-and-fishery-evaluation-reports/.

NPFMC (North Pacific Fishery Management Council). 2023. Stock Assessment and Fishery Evaluation Report for the Groundfish Resources of the Gulf of Alaska. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: http://www.npfmc.org/safe-stock-assessment-and-fishery-evaluation-reports/.

NPFMC (North Pacific Fishery Management Council). 2023. Stock Assessment and Fishery Evaluation Report for the King and Tanner Crab Fisheries of the Bering Sea/Aleutian Islands Regions. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: http://www.npfmc.org/safe-stock-assessment-and-fishery-evaluation-reports/.

NPFMC (North Pacific Fishery Management Council). 2023. Stock Assessment and Fishery Evaluation Report for the Scallop Fishery Off Alaska. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: http://www.npfmc.org/safe-stock-assessment-and-fishery-evaluation-reports/.

NPFMC (North Pacific Fishery Management Council). 2024. Stock Assessment and Fishery Evaluation Report for the Salmon Fishery of the Cook Inlet Exclusive Economic Zone Area. North Pacific Fishery Management Council. Anchorage, Alaska. Available at: https://www.fisheries.noaa.gov/alaska/population-assessments/alaska-stock-assessments.

NPFMC (North Pacific Fisheries Management Council). 2016. Twenty Year Review of the Pacific Halibut and Sablefish Individual Fishing Quota Management Program. December, 2016. Available at: https://www.npfmc.org/wp-content/PDFdocuments/halibut/IFQProgramReview_417.pdf

Appendix 1 Crew Data Collection Form Example Sections

Section 1 - Vessel Identification
This questionnaire is designed to collect information on individual vessels even if the vessel is part of a larger company. The intent is to evaluate each vessel as a stand-alone entity. All of the following questions pertain to calendar year 20xx. Indicate "N/A" for any item that is not applicable.

Vessel Name	
1. USCG Documentation No.	
2. ADF&G Vessel No. (K12345 or 12345)	

Section 2 – Crew Compensation

In the table below, report the total calendar year 20xx compensation including bonuses and payroll taxes, but excluding benefits and insurance. Round all answers to the nearest 100 dollars. For each item, if not applicable, enter "N/A" for the dollar amount.

Expense Category	Total Cost
1. Fishing (deck crew) labor compensation	$
2. Processing labor compensation	$
3. Labor compensation for all other employees (engineers, cooks, etc.) aboard the vessel	$
4. Hired captain compensation	$

Section 3 – Crew Positions
In the table below, report information about average and total number of individuals employed onboard the vessel. For individuals that worked in more than one category, report information associated with their primary category of work. If not applicable, enter "N/A".

1. What was the average number of positions on the vessel and the total number of individuals employed during the 20xx calendar year, counting separately by fishing (deck) crew, processing employees, and all other positions. The sum of the number of positions should be the total size of the vessel's crew as reported in eLandings (on average).		
Labor category	Average number of positions aboard	Number of employees in 20xx
a. Fishing (deck crew)		
b. Processing		
c. Hired captains		
d. All other employees onboard the vessel (including officers, engineers, cooks, etc)		

Section 4 – Check Box Method - Harvest Crew Licenses/CFEC Permits

In the table below, report either the ADF&G Commercial Crew license number or CFEC Gear Operator permit number for each individual who worked as a licensed fishing crew member on the Catcher Vessel/Processor during the previous calendar year. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a fishing crew member during groundfish fisheries. Include deck crew, captains, officers, processors, engineers, and other fishing crew members.

For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g., M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license or permit number per crew member. If not applicable, enter “N/A” in the first row.

License Number	AFA/ A80	CGOA RP	IFQ	Open Access	PCTC	UCI Salmon	Other
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐
	☐	☐	☐	☐	☐	☐	☐

Note: Commercial fishing license and permit information is public record. A vessel has the right to record the crew member's license number or permit ID and no release is necessary to report the information here.

Section 4 – Begin Date/End Date Method - Harvest Crew Licenses/CFEC Permits

In the table below, report either the ADF&G Commercial Crew license number or CFEC Gear Operator permit number for each individual who worked as a licensed fishing crew member on the Catcher Vessel/Processor during the previous calendar year. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a fishing crew member during groundfish fisheries. Include deck crew, captains, officers, processors, engineers, and other fishing crew members.

For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g., M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license or permit number per crew member. If not applicable, enter "N/A" in the first row.

License Number	Begin Date	End Date
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY
	MM/DD/YYYY	MM/DD/YYYY

Note: Commercial fishing license and permit information is public record. A vessel has the right to record the crew member's license number or permit ID and no release is necessary to report the information here.

Section 4 – Crew License Only Method - Harvest Crew Licenses/CFEC Permits

In the table below, report either the ADF&G Commercial Crew license number or CFEC Gear Operator permit number for each individual who worked as a licensed fishing crew member on the Catcher Vessel/Processor during the previous calendar year. Do not record more than one license or permit number for any individual, but include every individual that worked on the vessel as a fishing crew member during groundfish fisheries. Include deck crew, captains, officers, processors, engineers, and other fishing crew members.

For Commercial Crew Licenses, report the full 7-digit license number. For Gear Operator Permits, include the fishery code and permit number (e.g., M71B25321N). Indicate if the number reported is an ADF&G Commercial Crew License number or a CFEC Gear Operator Permit Number in the appropriate checkbox, and only record one license or permit number per crew member. If not applicable, enter "N/A" in the first row.

License Number

Note: Commercial fishing license and permit information is public record. A vessel has the right to record the crew member's license number or permit ID and no release is necessary to report the information here.