



Date: December 6, 2016

To: Marine Mammal Protection Act (MMPA) Authorization Holder

Re: Request for Information on Your MMPA Incidental Take Authorization

Hello,

The Paperwork Reduction Act of 1995 (PRA) prevents federal agencies from placing undue burdens on the public when asking for information. To comply with the PRA, we sought public comment, through a 60-day *Federal Register* notice (81 FR 67984), on the information collection requirements for a Marine Mammal Protection Act Incidental Take Authorization (ITA).

As a part of this process we must:

- estimate an applicant's paperwork and response burden (*i.e.*, time and cost) for an Incidental Harassment Authorization (IHA) or a Letter of Authorization (LOA) application; and
- seek input on the clarity of our instructions, the accuracy of previous reported estimates, and the usefulness of the information collected pre- and post-activity.

We presented an estimate of this information in the *Federal Register* notice. If you would like to submit estimates for time and cost and provide your opinion on our ITA process, please fill out the enclosed table and answer three quick questions. If a particular activity in the table does not apply to your situation, please note N/A.

Your organization is not required to complete this survey, but we appreciate your willingness to do so. You may also reply with "No Comment." Once you've finished the survey, please return this table to me at [Dale.Youngkin@noaa.gov](mailto:Dale.Youngkin@noaa.gov) by Friday, December 23, 2016. Also, if you have any questions, feel free to call me at 301.427-8426.

Thank you,

Dale Youngkin

Attachment # 2 – Project Proponent information for the 2016 Survey for NMFS, Office of Protected Resources, Incidental Take Program’s Applicants on Burden of Information Collection Requirements under the Paperwork Reduction Act.

<b>Activity</b> (Please note ‘N/A’ if not applicable)	<b>Time to Complete</b> (Hours)
IHA Application Preparation	Simple 225, Complex 400, Revision 100
Initial LOA Application Preparation for 5-Yr Rule	
Subsequent Annual/Bi-Annual LOA Application	
Environmental Assessment	
Preparation of an Interim Report for an IHA	
Preparation of a Draft Annual Report for an IHA or LOA	Simple 200, Complex 350
Preparation of a Final Annual Report for an IHA or LOA	Simple 40, Complex 150
Preparation of a LOA Draft Comprehensive Report	
Preparation of a LOA Final Comprehensive Report	
<b>Activity</b>	<b>Estimated Cost</b> (Dollars)
Equipment (computers, software, etc)	These costs built into our overhead
Copying/ Printing	
Faxing/ Phone Calls	
Postage/Shipping	

**Question 1:**

On a scale from 1 to 10, how clear are the instructions for submitting and completing an Incidental Take Authorization? (0 = Not Clear; 10 = Extremely Clear)

**Brief Answer:** 8

**Question 2:**

How accurate are the burden estimates shown in Attachment 2 for your organization (e.g., much lower than my estimate, very close to my estimate, much higher than my estimate)?

**Brief Answer:** Completely depends on the application. I provided estimates for a simple project, a complex project, and a revision. For the most part this is an accurate average for the interim reports.

**Question 3:**

What are your thoughts on the utility of the data that we collect from your organization?

**Brief Answer:** You are missing that the number of hours spent between first submittal of the application and receipt of the IHA is about as much as preparing the IHA application. This includes time and travel for peer review meetings, revising applications due to new data or new approaches from NMFS, multiple consultations, reviews of peer reviewer comments and draft public notices. Also, the draft annual report is a matter of how much data is collected. I have had 90-day reports with fewer than dozen sightings and others with 1,000s of records.

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**Table 1 – Estimates of Time Spent on ITA Applications and Reports**

<b>Information Collection Activity</b>	<b>Estimated Length of Time to Prepare</b>	
	<b>Hours</b>	<b>Days*</b>
<b>IHA Application</b>	<b>256</b>	<b>32</b>
<b>IHA Interim Draft Report</b>	<b>25</b>	<b>3.125</b>
<b>IHA Draft Annual Report</b>	<b>116</b>	<b>14.5</b>
<b>IHA Final Annual Report</b>	<b>15</b>	<b>1.875</b>
<b>LOA – Initial Application Preparation for Regulations</b>	<b>1,200</b>	<b>150</b>
<b>LOA – Annual LOA Application</b>	<b>70</b>	<b>8.75</b>
<b>LOA – Draft Annual Report</b>	<b>225</b>	<b>28.125</b>
<b>LOA – Final Annual Report</b>	<b>70</b>	<b>8.75</b>
<b>LOA – Draft Comprehensive Report</b>	<b>640</b>	<b>80</b>
<b>LOA – Final Comprehensive Report</b>	<b>300</b>	<b>37.5</b>

\*Days calculated as 8-hour business day