



Baucum, Madonna <madonna\_baucum@fws.gov>

---

## [EXTERNAL] Marine Mammal Commission comments on OMB Control No 1018-0070

---

**Vicki Cornish** <VCornish@mmc.gov>  
To: "Info\_Coll@fws.gov" <Info\_Coll@fws.gov>  
Cc: Phyllis Malloy <PMalloy@mmc.gov>

Fri, Jan 3, 2020 at 10:06 AM

Please see attached comments from the Marine Mammal Commission on the Notice of Information Collection regarding the incidental take of marine mammals in Alaska during oil and gas-related activities, OMB Control Number 1018-0070.



Vicki Cornish

Energy Policy Analyst

**Marine Mammal Commission**

4340 East-West Highway, Room 700

Bethesda, MD 20814

Office: 301.504.0087

Direct: 301.504.0273

[www.mmc.gov](http://www.mmc.gov)

*The Marine Mammal Commission is an independent agency of the U.S. Government. Follow us on Twitter: @MarineMammalCom. [Click here](#) to sign up for our newsletter!*



**20-01-03, Baucum, FWS ICR for oil and gas-related MM applications and reports.pdf**  
352K



# MARINE MAMMAL COMMISSION

3 January 2020

Ms. Madonna L. Baucum  
Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
MS: PRB/PERMA (JAO/1N)  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803

RE: OMB Control Number 1018-0070

Dear Ms. Baucum:

The staff of the Marine Mammal Commission, on behalf of the Commission, has reviewed the U.S. Fish and Wildlife Service's (FWS) 7 November 2019 *Federal Register* notice (84 Fed. Reg. 60107) proposing to renew an information collection authorization regarding the taking of marine mammals incidental to oil and gas activities in Alaska. Section 101(a)(5)(A) of the Marine Mammal Protection Act (MMPA) directs the Secretary of the Interior to allow, upon request by citizens of the United States, the taking of small numbers of marine mammals incidental to specified activities if the Secretary makes certain findings and prescribes regulations that, among other things, set forth permissible methods of taking and requirements pertaining to monitoring and reporting.

The Commission believes that the information requested under the currently approved collection is necessary and appropriate for making the findings and satisfying the reporting requirements under section 101(a)(5)(A) of the MMPA and its implementing regulations at 50 C.F.R. Part 18. The information collection is also used to determine whether a Letter of Authorization (LOA) should be issued to applicants, and if so, under what conditions. Finally, the information collection is used by FWS to ensure compliance with its implementing regulations and to evaluate the impacts of authorized takings on marine mammals and the availability of marine mammals for Alaska Native subsistence purposes.

The Commission supports FWS's request that the Office of Management and Budget extend the currently approved collection of information, in accordance with the requirements of section 101(a)(5)(A) the MMPA, and agrees that the burden of the collection of information on respondents is reasonable. However, in order to enhance the quality, utility, and clarity of the information to be collected, the Commission encourages FWS to direct applicants and LOA holders to submit information and reports, including marine mammal observational data sheets and raw sightings data, in electronic format. The Commission also encourages FWS to make applications, LOAs, and reports submitted in compliance with section 101(a)(5) of the MMPA and implementing regulations at 50 C.F.R Part 18 available to the public in a timely manner on its website, as is done by the National Marine Fisheries Service<sup>1</sup>.

---

<sup>1</sup> <https://www.fisheries.noaa.gov/national/marine-mammal-protection/incidental-take-authorizations-oil-and-gas>

Ms. Madonna L. Baucum  
3 January 2020  
Page 2

Thank you for the opportunity to comment, and please let me know if you have any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas". The signature is written in a cursive style with a large initial "P" and a stylized "O".

Peter O. Thomas, Ph.D.  
Executive Director