

**JUSTIFICATION FOR CHANGE
ALASKA REGION BSAI CRAB PERMITS
OMB CONTROL NO. 0648-0514**

This action merges the OMB Control No. 0648-0576 collection entitled “Application for Converted CPO Quota Share and CPO IFQ” into OMB Control No. 0648-0514, Alaska Region Bering Sea and Aleutian Islands (BSAI) Crab Permits.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) authorizes the North Pacific Fishery Management Council to prepare and amend fishery management plans for any fishery in waters under its jurisdiction. National Marine Fisheries Service (NMFS) manages the crab fisheries in the waters off the coast of Alaska under the Fishery Management Plan (FMP) for Bering Sea and Aleutian Islands King and Tanner Crabs. Regulations implementing the FMP appear at 50 CFR part 680. Regulations at 50 CFR part 679 and subpart H of 50 CFR part 600 also pertain.

The Crab Rationalization Program (CR Program) allocates BSAI crab resources among harvesters, processors, and coastal communities. The CR Program is a limited access system that balances the interests of several groups who depend on these fisheries. The CR Program addresses conservation and management issues associated with the previous derby fishery, reduces bycatch and associated discard mortality, and increases the safety of crab fishermen by ending the race for fish.

The 0576 collection consists of an application for catcher/processor owner quota share and individual fishing quota (IFQ). An eligible entity and its commonly-owned affiliates may combine North processor quota share (PQS) and North catcher vessel owner quota share (CVO QS) and exchange these shares for newly created converted catcher/processor owner quota shares (CPO QS). Allowing entities to convert PQS and CVO QS to CPO QS allows them to harvest and process crab onboard a catcher/processor. Electing to exercise this provision could reduce each eligible entity’s operating costs associated with purchasing crab, processing crab on land or in a stationary floating processor (SFP), and complying with the CR Program’s arbitration system.

Eligible entities would receive one unit of North CPO QS in exchange for one unit of North CVO QS and 0.9 units of North PQS. The amount of converted CPO QS issued to each entity could not exceed 1 million pounds during any calendar year.

According to the NMFS Official Record, three individual entities are eligible for these provisions. Yardarm Knot Fisheries, Limited Liability Company (LLC), and its commonly-owned affiliates, and Blue Dutch, LLC, and its commonly-owned affiliates, are eligible for the first type of conversion. Trident Seafoods, and its commonly-owned affiliates, are eligible for the second type of conversion. NMFS cannot predict the amount of converted CPO QS that would be annually issued because the participants would elect to exercise this provision year by year and need not request conversion of all CVO QS and PQS held.

While the statutory language does not specifically define which fisheries are subject to this provision, converted CPO QS was created for the snow crab and Bristol Bay red king crab fisheries, because these were the only fisheries for which the eligible entities were initially issued North PQS and North CVO QS.

Because the entities involved in the 0576 collection are also entities with CR Program permits, the merging of the 0576 and 0514 will not result in additional respondents; however, it does result in addition of three total annual responses, two hours of burden, \$50 in personnel costs, and \$7 in miscellaneous costs.

Annual application for Crab Converted CPO QS and CPO IFQ, Respondent	
Number of respondents	3
Total annual responses	3
Frequency of response = 1	
Total burden hours (0.5 x 3 = 1.50)	2 hr
Time per response = 0.5 hr	
Total personnel cost (\$25 x 2)	\$50
Total miscellaneous costs (7.42)	\$7
Annual postage (.41 x 2 = .82)	
Annual photocopy (2 x .10 x 3= 0.60)	
Annual fax (\$6 x 1 = 6)	

Thus, total responses for OMB Control No. 0648-0514 will become 2,902; hours, 4,452, and miscellaneous costs, 12,381.