

**SUPPORTING STATEMENT  
NORTHERN MARIANA ISLANDS  
COMMERCIAL BOTTOMFISH FISHERY PERMIT  
OMB CONTROL NO. 0648-0584**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

This request is for revision and extension of a previously approved information collection. We are changing the title from “Permitting and Vessel Identification Requirements for the Commercial Bottomfish Fishery in the Commonwealth of the Northern Mariana Islands” to “Northern Mariana Islands Commercial Bottomfish Fishery Permit,” as the vessel identification requirement was merged into OMB Control No. 0648-0360, Pacific Islands Region Vessel and Gear Identification Requirements.

The [Magnuson-Stevens Fishery Conservation and Management Act](#) (Magnuson Act) established regional fishery management councils, including the Western Pacific Fishery Management Council (Council), to develop fishery ecosystem plans (FEPs) for fisheries in the United States (U.S.) exclusive economic zone (EEZ). These plans, if approved by the Secretary of Commerce, are implemented by Federal regulations, which are enforced by the National Oceanic and Atmospheric Administration (NOAA) and the United States Coast Guard (USCG), in cooperation with state agencies to the extent possible. The fishery management plans are intended to regulate fishing to ensure sustained productivity and achievement of optimum yield from the resources for the benefit of the United States.

In 2009, the Council prepared, and the Secretary approved and implemented through regulations at [50 CFR Part 665](#), an amendment to the FEP for the Marianas Archipelago. The regulations require the owners of commercial fishing vessels in the bottomfish fishery in the Commonwealth of the Northern Mariana Islands (CNMI) to register their vessels to a valid Federal bottomfish permit issued by the National Marine Fisheries Service (NMFS). This collection of information is needed for permit issuance, to identify actual or potential participants in the fishery, determine qualifications for permits, and to help measure the impacts of management controls on the participants in the fishery. The permit program is also an effective tool in the enforcement of fishery regulations and serves as a link between NMFS and fishermen.

**2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.**

Information is collected via a NMFS permit application process. Permits are valid for one calendar year and may be renewed annually. Information from the permit application form will allow NMFS to confirm the identity of the permit holder and applicant, and to determine whether the applicant qualifies for the permit. Vessel-related information such as vessel documentation or registration, ownership, managing ownership, etc., are used by NMFS to determine whether the

applicant is an owner of a U.S. documented/registered vessel. The information may also be used by NOAA's Office of Law Enforcement (OLE), the USCG, and the Council.

NMFS will retain control over the information and safeguard it from improper access, modification, and destruction, consistent with Federal law and regulations, and NOAA policies for confidentiality, privacy, and electronic information. See response to Question 10 of this Supporting Statement for more information on confidentiality and privacy. The information collection is designed to yield data that meet all applicable information quality guidelines. Prior to dissemination, the information will be subjected to quality control measures and a pre-dissemination review pursuant to [Section 515 of Public Law 106-554](#).

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

A Federal CNMI bottomfish fillable Acrobat permit application is available online at [http://www.fpir.noaa.gov/SFD/SFD\\_permits\\_index.html](http://www.fpir.noaa.gov/SFD/SFD_permits_index.html) and from PIRO.

**4. Describe efforts to identify duplication.**

There is no similar CNMI permit requirement for the commercial CNMI bottomfish fishery.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

All respondents are considered small businesses.

Applications are available online to reduce the burden of time spent applying or ordering by mail. They may be downloaded, filled, printed, signed, and then mailed to NMFS. Permits will be issued by NMFS and delivered via U.S. mail.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Without this collection or if it is collected less frequently, NMFS would be unable to properly evaluate activity, participation, and reporting compliance in the commercial CNMI bottomfish fishery. It would be difficult to monitor the fisheries and their participants, determine entry and exit patterns, and provide information needed to ensure full impact analysis for fisheries management programs. Without this information, enforcement agents would not be able to identify current fishery participants for compliance monitoring purposes and NMFS would be unable to consult with permit holders on regulatory changes.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

None.

**8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

A Federal Register notice published on February 2, 2015 (80 FR 5514), solicited public comments on this extension. No comments were received from the notice publication.

Six individuals in the public or fishing sector were contacted for comments. Three individuals responded.

Comment 1: “Just curious with what you do with all the bottom fish data? And, why the fee change on every permit renewal?”

Response: We use the bottomfish data (which would come from logbooks) to track catch (type of fish and number of fish) and effort (fishing days/hours, amount of gear). That gives us an idea of how the fish population is affected by fishing, and combined with other information, an idea of how the fish population is doing overall.

The fee is evaluated every two years. The process for setting the fee is set in a financial procedures handbook. We are not allowed to set the fee higher than what it costs to process the application. If we need to adjust the fee because the number of fishermen changed or the processing of permits changes, we will do it then. In the case of the CNMI bottomfish fee, fewer fishermen are signing up for permits, and when we lowered our estimate of participating fishermen, the fee went up.

Do you have any comments on the form, the amount of time it takes to fill one out, or the cost of applying for a permit, or how to make it work better?

Comment 2: “The instruction is understandable and the application form is informative.”

Response: NMFS thanked the commenter for the response.

Comment 3: “Looks good; leave as is”.

Response: NMFS thanked the commenter for the response.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts are provided

**10. Describe any assurance or confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

As stated on the permit application form: under Section 402(b) of the Magnuson-Stevens Act, as amended in 2006, and [NOAA Administrative Order 216-100](#), information submitted in accordance with regulatory requirements under the Act is confidential. This includes personal and proprietary information contained in the permits, logbooks and sales reports.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No questions are asked of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

NMFS expects a total of 30 applicants for Federal CNMI bottomfish permits each year. Applicants are expected to spend 15 minutes per application, whether applying for the first time or renewing their existing permit. Thus, the total collection-of-information burden to fishermen is estimated at 7.5 hours per year.

**Total number of responses: 30 permit applications**

**Total number of hours: 30 applications x .25 hr = 7.5(8) hours.**

**13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection (excluding the value of the burden hours in Question 12 above).**

There is no start-up capital cost for complying with this requirement. The maximum estimated cost to respondents for postage, faxes, copies, etc., related to this collection is \$40 per year. In addition, there is a non-refundable application processing fee of \$54 per application, for a total of \$1,620. Thus, total permit application costs are **\$1,660**.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated annual cost to the Federal government to process permit applications and issue permits is **\$450 per year** (30 permits x 30 min/permit x \$30/hr).

**15. Explain the reasons for any program changes or adjustments.**

*Program Changes:*

The vessel identification requirement, formerly a part of this collection, was previously merged into OMB Control No. 0648-0360 and will be removed from this collection. This removes 6 responses, 5 burden hours, and reduction of costs by \$60.

*Adjustments:*

There are 95 fewer estimated applicants, resulting in 95 fewer responses, and an adjustment of preparation time to 15 minutes, resulting in a reduction of burden hours by 55 hours. In addition, permit appeals were erroneously included in the previous submission. There is no permit appeal allowed for this permit, resulting in a reduction of one response and two hours. The application processing fee was not included in the previous submission, and including them raises the total cost burden to \$1,660.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

No formal scientific publications based on these collections are planned at this time. NMFS and the Council will use the data (primarily in an aggregated, non-confidential format) for developing management reports and fishery management plan amendments and evaluations. However, subsequent use of the data collected over a series of years may include scientific papers and publications.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not Applicable.

**18. Explain each exception to the certification statement.**

Not Applicable.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

No statistical methods are employed.