

**JUSTIFICATION FOR CHANGE
WEST COAST REGION PERMIT FAMILY OF FORMS
OMB CONTROL NO. 0648-0204**

Under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. 1831 et seq., permits are required for persons to participate in Federally-managed fisheries off the West Coast. The Highly Migratory Species (HMS) permit and Coastal Pelagic Species (CPS) limited entry permit are required for all vessels participating in HMS and CPS fisheries managed under the appropriate fisheries management plans. Under 50 CFR part 660.707, HMS permits are issued to vessels that fish for HMS off or land HMS in the States of California, Oregon, and Washington. Permits are issued for a 2-year term and remain valid until the first date of renewal. Under 50 CFR part 660.515, CPS limited entry permits are issued for a 2-year term and remain valid until December 31 of odd numbered years.

This request is to modify the HMS and CPS permits and renewal procedures that have already been approved for permit holders.

- 1) Pre-filled HMS renewal form: Currently, HMS renewal forms are mailed to permit holders 60 days prior to expiration. The form is currently pre-filled with the vessel name, Coast Guard Documentation or state registration number, year and location that the vessel was built, previous vessel names, and primary permit holder name. A completely pre-filled application form would include all of the vessel and owner information provided in the initial application. Forms can be completed by signing and dating a statement of acknowledgement that all current information is correct.
- 2) CPS online permit renewal: CPS permits will have an optional mail-in or online application renewal. Online renewals will only be available on the National Permit System during an open period between October 1 and December 31 of odd numbered years.

The National Marine Fisheries Service (NMFS) seeks approval to change the HMS paper mail-in renewal application to a completely pre-filled form. This form will include all of the required permit elements. Applicants would be required to sign and date the form, agreeing that all above information is “complete, true, and correct to the best of my knowledge and belief.” If changes are required during the renewal period, applicants can cross out previous information and write-in changes. Citizenship verification will be obtained in the initial permit application. In addition, we would like to offer an optional CPS online permit renewal.

The basic information collected from applicants will remain the same. There will be no additional burden beyond the 1.10 hours estimated application processing time or recordkeeping/reporting costs.

Copies of the pre-filled HMS renewal form and screen shot of the CPS online renewal application are attached.