

Fwd: Request for Comments on Proposed Revisions to MMPA/ESA Permit/Authorization Application Instructions

1 message

Amy Hapeman - NOAA Federal <amy.hapeman@noaa.gov>

Tue, Jun 2, 2026 at 1:17 PM

To: Adrienne Thomas - NOAA Federal <adrienne.thomas@noaa.gov>, Jazmin Williams - NOAA Affiliate <jazmin.williams@noaa.gov>

Hi ladies,

Below are the comments we received from the MMC for the PRA effort.

Thanks,

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Amy Hapeman

Fisheries Biologist, Office of Protected Resources

NOAA Fisheries | U.S. Department of Commerce

www.fisheries.noaa.gov

----- Forwarded message -----

From: **Peter Thomas** <PThomas@mmc.gov>

Date: Tue, Apr 21, 2026 at 5:59 PM

Subject: RE: Request for Comments on Proposed Revisions to MMPA/ESA Permit/Authorization Application Instructions

To: Trevor Spradlin - NOAA Federal <trevor.spradlin@noaa.gov>

Cc: Tiffini Brookens <TBrookens@mmc.gov>, Lauri Leach <LLeach@mmc.gov>, Amy Hapeman - NOAA Federal <amy.hapeman@noaa.gov>, NMFS PR Research <ndfs.pr.research@noaa.gov>, Kimberly Damon-Randall - NOAA Federal <kimberly.damon-randall@noaa.gov>, shannon.bettridge@noaa.gov <shannon.bettridge@noaa.gov>

Dear Amy and Trevor:

Thanks to you and your team for the opportunity to comment on the proposed revisions to NMFS's MMPA/ESA permit application instructions. Lauri Leach and Tiff Brookens have reviewed these carefully. Below find our answers and comments in response to your three questions. In the attached document we have provided some additional suggested improvements.

1. Is the agency's estimate of the burden of the proposed collection of information accurate? NOAA/NMFS/OPR currently estimates 2 to 50 hours depending on the collection instrument to complete the forms and that respondents will be required to submit approximately one response annually.

The Commission notes that the estimated burden for the proposed collection of information increased from 30 to 50 hours for public display applications and was not changed for LOCs, parts, photography, or research permit applications. The Commission supports the agency's estimates.

2. Do you have any suggestions on ways to minimize the burden of the collection of information, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Adding photography and public display applications to APPS and NMFS's ability to issue permits for longer than 5 years is a great start to minimizing the burden of the collection. Since the Commission does not directly use APPS during its review, one suggestion to minimize the burden of the collection of information is to ensure that application revisions made during the public comment period/Commission review are consistently incorporated into an updated application in APPS. This greatly simplifies the review process for renewal applications and ensures that the most accurate information is available to the public, as well as to the applicant for their reference while conducting research and when they are ready to submit a renewal application. The Commission understands that each application is assessed on its own merit, however, when reviewing renewal applications, it is not uncommon to see the same text from past submissions that does not include the revisions, clarifications, and additions made when the previous permit application was reviewed. Ensuring revisions are incorporated into APPS would significantly streamline and reduce the burden of the collection of information during the application process—it is inefficient for all parties involved to have to provide and/or respond to the same questions and comments every renewal period.

Another way to minimize the burden of collection, particularly the back and forth with applicants when information is lacking regarding researchers' experience, is to continue to require QF forms. NMFS softened its language from requiring to recommending QF forms, presumably to reduce requirements for applicants. However, these forms ensure applicants submit all of the necessary information regarding their and their CIs' qualifications and experience, and in doing so, they streamline the application and review process. As such, the Commission believes that NMFS should continue to require applicants to submit QF forms for him/her and the CIs that would conduct research under the permit.

The most efficient way to minimize the burden of the information collection would be to finalize the standard methods for conducting research on cetaceans and pinnipeds. As previously noted, the recent National Sea Turtle Research Standard Methods Manual was very well done and it would be useful for NMFS to finalize the similar in-draft manual for cetaceans and pinnipeds in the near term. The standard methods would benefit the agency, the applicants and permittees, the Commission, and the public.

3. Do you have any suggestions to enhance the quality, utility, and clarity of the information to be collected? Are the forms and instructions clear and easy to understand?

The forms and instructions are clear and easy to understand. The proposed re-organization of sections of the forms helped with this.

As noted above, Some additional suggested improvements are included in the attached document. Thank you for the opportunity to assist in your review and revision of the MMPA/ESA Permit/Authorization Application Instructions.

With all best wishes.

Peter

Peter O. Thomas, Ph.D.

Executive Director

Marine Mammal Commission

pthomas@mmc.gov | Office 301.504.0087 | Cell 202.699.0913



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From: Trevor Spradlin - NOAA Federal <trevor.spradlin@noaa.gov>

Sent: Monday, March 9, 2026 3:23 PM

To: Peter Thomas <PTThomas@mmc.gov>

Cc: Tiffini Brookens <TBrookens@mmc.gov>; Lauri Leach <LLeach@mmc.gov>; Amy Hapeman - NOAA Federal <amy.hapeman@noaa.gov>; _NMFS PR Research <nmfs.pr.research@noaa.gov>; Kimberly Damon-Randall - NOAA Federal <kimberly.damon-randall@noaa.gov>; shannon.bettridge@noaa.gov

Subject: Request for Comments on Proposed Revisions to MMPA/ESA Permit/Authorization Application Instructions

Dear Peter -- I hope all is well. My team and I in the NOAA Fisheries' Office of Protected Resources' (OPR) Permits and Conservation Division-Directed Take Program (DTP) want to let you know that we just published a notice in the *Federal Register* pursuant to the Paperwork Reduction Act (PRA) announcing our proposal to revise and renew the application instructions for permits and authorizations to take, import, or export marine mammals, or other threatened or endangered species, including their parts, for:

- Scientific Research;
- Enhancement;
- Public Display; or
- Commercial and Educational Photography

The FR notice is titled "**0648-0084, Basic Requirements for Special Exception Permits and Authorizations to Take, Import, and Export Marine Mammals and Endangered and Threatened Species and for Maintaining a Captive Marine Mammal Inventory Under the Marine**

Mammal Protection Act, the Fur Seal Act, and the Endangered Species Act" and can be accessed online at:
<https://www.federalregister.gov/documents/2026/03/09/2026-04530/agency-information-collection-activities-submission-to-the-office-of-management-and-budget-omb-for>

The public comment period for public review of the proposed revisions to our application instructions is open for **60 days and closes on May 8, 2026**.

As part of the PRA renewal process, OMB requires that we also seek comments from key respondents on various aspects of the collection during the public comment period. We have identified you as a key respondent given your leadership role in a professional organization for marine protected species that applies for permits or authorizations from OPR -- *i.e.*, as the Executive Director of the Marine Mammal Commission. Specifically, we would like to seek input on the following questions directly from you on behalf of your organization's collective experience:

1. Is the agency's estimate of the burden of the proposed collection of information accurate? NOAA/NMFS/OPR currently estimates 2 to 50 hours depending on the collection instrument to complete the forms and that respondents will be required to submit approximately one response annually.
2. Do you have any suggestions on ways to minimize the burden of the collection of information, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submission of responses.
3. Do you have any suggestions to enhance the quality, utility, and clarity of the information to be collected? Are the forms and instructions clear and easy to understand?

The proposed revisions to each set of instructions can be viewed on our web page:

<https://www.fisheries.noaa.gov/national/permits/proposed-revisions-application-instructions-permits-and-authorizations-directed>.

Please email your responses (on behalf of your organization) to the above questions directly to Amy Hapeman at amy.hapeman@noaa.gov or through the Federal Register notice's web page. Please let Amy Hapeman know if you have questions about this process.

Cheers -- Trevor and the DTP

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Trevor R. Spradlin, M.Res.

Supervisor, Directed Take Program

Scientific Research, Public Display, Commercial/Educational Photography,

Marine Wildlife Viewing

[Permits and Conservation Division](#) (PR1)

Office of Protected Resources
NOAA/National Marine Fisheries Service
Tel: 301-427-8479
E-mail: Trevor.Spradlin@noaa.gov

