National Marine Fisheries Service

Instructions for a Marine Mammal General Authorization Letter of Intent

TABLE OF CONTENTS

INTRODUCTION **2**
New to the GA? Have questions or need help? 2
When filling out your Letter of Intent 2
LETTER OF INTENT **3**
Project Information 3
Project Purpose: Hypothesis/Objectives and Justification 4
Project Description 6
Project Supplemental Information 11
Project Location 11
Take Table 12
Anticipated Effects on the Environment 14
Project Contacts 16
Submit Application 19
ADDITIONAL INFORMATION **19**
What types of research usually qualify as Level B harassment? 19
What are a Letter of Intent and a Letter of Confirmation? 20
What are the advantages of applying under the GA? 20
When should I apply? 20
What is the process for getting an LOC? 20
What is the process for requesting an amendment to an LOC? 20
What if I want to conduct research on endangered or threatened species or conduct research that exceeds Level B harassment? 20
APPLICABLE LAWS AND REGULATIONS **21**
PAPERWORK REDUCTION ACT STATEMENT **21**

Introduction

These instructions are for submitting a Letter of Intent (LOI) under the Marine Mammal Protection Act (MMPA) General Authorization (GA) for *bona fide* **scientific research** on **non-listed marine mammals** for activities involving only **Level B harassment**.

> **Level B harassment** means any act of pursuit, torment, or annoyance which has the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering but which does not have the potential to injure a marine mammal or marine mammal stock in the wild.

These instructions are **not** for research on marine mammals listed as endangered or threatened under the Endangered Species Act (ESA). See a list of ESA species under NMFS' jurisdiction. They are also **not** for research that exceeds Level B harassment (e.g., captures, biopsy sampling, or tagging).

New to the GA? Have questions or need help?

We recommend you visit our General Authorization web page, see the Additional Information on page 19, or contact us at nmfs.pr1.apps@noaa.gov.

When filling out your Letter of Intent

- Your LOI must be a stand-alone document, readable to a layperson.
- If you do not follow these instructions, your LOI will be returned.
- We will not consider your LOI if you have overdue reports.
- You will need to enter this information in our online permit system, APPS https://apps.nmfs.noaa.gov/.

Letter of Intent

Project Information

File Number: This number is generated by APPS and cannot be changed. To facilitate processing, reference this File No. in correspondence with our office.

***Project Title** (up to 255 characters): Provide a concise title that includes activities, species (or taxa if multiple species), location, and purpose of the study. For example:

- *Boat-based photo-ID of bottlenose dolphins in the Gulf of Mexico to characterize population structure and movement patterns.*

***Project Status**: The project status (New or Renewal) is automatically selected based on your answers in the APPS pre-application guide (PAG). Do not change this.

Previous Federal or State Permit #: If applicable, enter your most recent and closely related NMFS LOC or permit number. Otherwise, leave blank.

***Permits Requested:** MMPA General Authorization should be listed based on your answers in the APPS PAG.

***Where Will the Activities Occur?** One or more general locations will be listed based on your answers in the APPS PAG.

Entering your LOI in APPS

- **Save your application every 20 minutes or you will lose information!**
- An * indicates a required field.
- Consider using these instructions as a template to draft your LOI in Word. Then cut and paste into APPS.
- Special characters may be lost or migrated incorrectly.
- Refer to Chapter 2 for how to navigate APPS.
- Your LOI will remain in draft mode until you submit.
- Attachments cannot be larger than 20MB – contact us if you need to attach larger files.

***Research Timeframe:** Enter the desired start and end dates of the entire project in the following format: MM/DD/YYYY. Currently, the maximum duration for an LOC is 5 years. See Additional Information on page 20 for details on when to apply.

***Sampling Season/Project Duration** (up to 1,000 characters)

- Describe in which months or seasons you will work. If year-round, indicate when activities are most likely to occur and how frequently.

***Abstract** (up to 2,000 characters): a short summary that must include:

- Purpose of the research.
- Species that may be harassed (common names). For research on multiple species, you can summarize instead of listing every one. For example: *6 species of cetaceans and 2 species of pinnipeds*.
- Take activities (e.g., boat based photo-ID).
- Specific geographic locations.

*Project Purpose: Hypothesis/Objectives and Justification (up to 64,000 characters)

We recommend you provide the information in this order:

1. Discuss the **need for the research** and your **research objectives or hypotheses**.

2. Explain how your proposed research is *bona fide*, including how likely the results of your research are likely to: 1) be accepted for publication in a refereed scientific journal; 2) contribute to the basic knowledge of the species biology or ecology; or 3) identify, evaluate, or resolve conservation problems.

3. Briefly summarize **published findings** related to your research.

    - If you previously held or worked under an LOC or research permit, use literature citations from that work to discuss how you previously met your objectives; and

    - Use other published literature on the subject.

4. Describe how this study is different from, builds upon, and/or duplicates past research.

5. **Take Number Rationale**: Explain how you estimated your annual take numbers (see guidance on pages 12-13 for how to count take). Under the GA, you will not be limited to this number or penalized if you exceed it.

    - For example, did you base take numbers on previously reported encounter rates or abundance estimates for your study area and the number of surveys to be conducted?
    - If appropriate for your study, include a power analysis or other sample size estimation to show whether the sample size is sufficient to provide statistically significant or otherwise robust results.
    - Your take numbers should be realistic based on your future research plans as well as your previous experience. We will examine reported take numbers from your annual reports and compare those to the take numbers you are requesting in your new application.
    - Discuss whether the same individual animals may be taken more than once a year.
        - If individual animals **cannot be identified in real time**, estimate how many animals may be taken repeatedly, maximum number of times an animal may be taken annually, and under what circumstances (e.g., multiple surveys in the same location).
        - If individual animals **can be identified in real time**, indicate the number of times known individuals may be intentionally taken in a year (e.g., repeat surveys in the same area for identifiable individuals). Explain why multiple takes of the same individual are needed to meet your objectives.

*Project Description (up to 64,000 characters)

Overview

Provide a **brief overview of a typical day** in the field and the suite of activities you intend to perform during a marine mammal encounter. Discuss the order in which you'll perform the different methods. Include where your work will happen, especially if different projects occur in different locations.

Methods

Describe your methods following the guidance below. Your narrative description must match your APPS take table (see Take Table section below).

List 1. Options for the APPS Take Table Method/Procedure column for an LOC. Options vary depending on if you are studying pinnipeds or cetaceans.

- Acoustic, passive recording
- Collect, molt
- Collect, scat
- Collect, sloughed skin
- Collect, spew
- Collect, urine
- Count/survey
- Imaging, thermal
- Observation, monitoring
- Observations, behavioral
- Other
- Photo-id
- Photogrammetry
- Photograph/video
- Remote vehicle, aerial (fixed wing)
- Remote vehicle, aerial (VTOL)
- Remote vehicle, vessel
- Remote video monitoring
- Sample, exhaled air
- Sample, fecal
- Underwater photo/ videography
- Unintentional harassment

When describing your methods, keep in mind:

- It is helpful to reference take table lines in the narrative that correspond to the take actions and procedures.
- **Mitigation measures** that are inherent to your methods may be included in this section or in the Effects and Mitigation section below.
- **Figures and photographs** that illustrate your methods. You can attach them on the Project Supplemental Information page.
- **Cite references** for the methods where applicable, but do not substitute a literature citation for a complete description. You can attach a Literature Cited

on the Project Supplemental Information page. References must be made available upon request.

You must provide the following information in the narrative description of the methods (i.e., observe/collect methods and procedures in the APPS take table):

- **Clear descriptions of all methods** (i.e., each observe/collect method and procedure in your APPS take table). See guidance below for what details to include.

- A brief statement how each procedure or suite of procedures relate to meeting your objectives.

- A description of how you **differentiate age classes** (e.g., neonate, calf/pup, juvenile, subadult, adult). If applicable, distinguish by taxa or species.

- State if and how you will target:
  - Calves/pups (specify age/dependency);
  - Females accompanying calves/pups (specify age);
  - Pregnant females, and if so, include estimated trimester; and/or
  - Compromised animals.

- **Opportunistic research:** If there are species that are not your main research focus, but that you would approach and study if opportunistically encountered, include a discussion of them in this section. Describe how the research would fit within your objectives and which methods you would use to study these species. Include rows for these species in your take table.

- **Data analysis:** Provide a brief description of how data and/or samples will be analyzed.

Guidance on Describing Commonly Used Methods

Aerial, ground, and vessel surveys

- Number of surveys per year
- Type of aircraft and vessel
- Number of platforms (aircraft and vessel) to be operated at the same time
- Type of survey (e.g., line transect, photogrammetry)
- Minimum altitude or approach distance to animals
- Air speed
- Vessel speed

- Protocols for breaking track to ID species
- Protocols for approaching on land, whether a blind or cover will be used
- Duration spent with group or individual per day

Unmanned aircraft systems (UAS)
Provide the general aerial survey information above and the following:
- Type of UAS – fixed wing or vertical takeoff and landing (VTOL)
- Number of platforms (UAS) to be operated at the same time
- Payload components – what is the UAS carrying and for what purpose (e.g., camera, sensor)?
- Ground control station (what it is, where it will be located - on shore or on vessel, number of stations, and how close the station will be to animals)
- Encounter duration – maximum amount of time over same animals
- Appropriate FAA permits/authorizations (including pilot licenses)

Remotely operated vehicle (ROV), vessel or amphibious
For underwater and amphibious ROVs, same details as for vessel surveys and also:
- Description and size of ROV
- Whether it is tethered or wireless, tether material and length
- Deployment method
- Describe any light sources
- Whether there will be a live video feed monitored
- Encounter duration

Underwater photography/videography
- Method (e.g., snorkeling, underwater pole cam, conventional scuba gear, or re-breathers)
- Maximum number of individuals in the water at a given time and their roles (including safety divers)
- Minimum approach distance to animals
- Maximum amount of time spent with same animals per day

Data collection
Examples include behavioral observations via focal follows and ground surveys, collecting scat/spew, photo-ID, passive acoustic monitoring, photogrammetry, and remote video monitoring. Be sure to discuss the following, as applicable:
- Approach method (e.g., by foot, vessel or aircraft)
- Sampling method
- Minimum approach distances
- Filming/photography equipment and methods

- For pinnipeds: Within sight of animals or not (e.g., from a blind)?
- Number of observations/sampling events per year
- Frequency of observations/sampling events per year (e.g., monthly)
- Samples to be collected and method (e.g., scat by hand)
- Number of approaches per animal per day for biological sampling
- Duration of observations/sampling per day

Effects and Mitigation

You may include mitigation and monitoring protocols here, or above in your methods. Do not restate them here if they are included above; simply reference the section where the following information is found.

- Discuss how **take table actions** (Observe/Collect Methods and Procedures) **will affect target and non-target animals.**

- Cite the **best available science** (i.e., peer-reviewed literature or other published data sources) and your experience (e.g., personal communication, annual permit reports). References must be made available upon request.

- **Group together take actions with similar responses** and describe, as applicable:

  - Typical behavioral responses
  - Worst-case responses
  - % of animals that typically exhibit each response type
  - Condition of animals on resight
  - Time it takes to resume normal behavior after disturbance
  - Time it takes to repopulate rookeries/haul outs after flushing
  - Effects on lactating females and their dependent young or other sensitive life stages

- Explain how your research **will not result in injury, mortality, or reproductive effects**.

- Describe what **mitigation measures** you will employ to **minimize adverse reactions**. If you will use the same mitigation measures for a suite of activities, you may provide one discussion for each suite of activities (e.g., close approach

by vessel for photo-identification, acoustic recordings, collection of voided feces, and behavioral observations).

- **If working with dependent calves/pups**, their moms, or known pregnant females, give specific protocols for working around them. For example, how will you avoid separating mothers from calves/pups?
- Describe your **monitoring** protocols after your activities.
- Explain **if and why monitoring or mitigation is not feasible** for specific species, situations, etc.
- Describe any **mitigation you will take to avoid or minimize impacts to non-target protected taxa** (e.g., sea turtles, corals, USFWS species). Discuss whether and how they may be unintentionally harassed or otherwise affected.

Non-target Marine Mammals

Discuss whether and how non-target marine mammals may be unintentionally harassed in your study area. These are species that co-occur with your target species and that could be harassed or taken during your research but that you will not opportunistically incorporate into your study.

- The GA cannot authorize you to take threatened or endangered species. If ESA-listed species occur in your study area, explain how you will identify and avoid them (e.g., not in area during time of study; would not approach closer than 100 meters; would halt operations until non-target species moved out of study area).

- If takes to non-target, non-ESA listed marine mammals may occur, include these as separate rows in your Take Table with unintentional harassment in the procedure column.

Other non-target taxa (e.g., sea turtles, seabirds, corals) should be addressed in the Effects and Mitigation section)

Research Coordination

- Describe how you will coordinate with other LOC/Permit Holders in your study area.
    - List their names and affiliations.

- Explain how you will work together. For example, will you share vessels or coordinate the timing of surveys to avoid repeated takes of the same animals?

- Will you collaborate with other permitted researchers to share data, for example, by contributing to a regional photo-ID catalog? If so, list names and affiliations and explain your collaboration plans.

Project Supplemental Information

Attach a Supplemental Information File

You can attach up to 10 files to provide additional information.

- Preferred file formats: Word, Excel, PDF, or text.
- The maximum file size allowed is 20 MB.
- Audio and video files (such as mp3, m4b, wav) cannot be uploaded. Contact us if you need assistance.
- On the Location screen you will be asked to attach a map.

Attach a References File

Attach a **bibliography** of references cited in your LOI. Referenced materials must be made available upon request, as needed for evaluation of the LOI and preparation of environmental analyses. If a link to your referenced material is available, add the link to your References File.

*Project Location

First, describe where you plan to work. Then, for each location, use the Take Table to list the species you expect to encounter and the take procedures you will conduct.

1. Add **New Location**: provide information about one or more study areas
    - General area (ocean basin)
    - State(s), as applicable.

2. Enter **Location Details**, as applicable:

- Waterbody: enter names of rivers, estuaries, bays, etc.
- Latitude and longitude of your study area
- Limits of your study area (e.g., to the U.S. EEZ, to the edge of the continental shelf, to 50m depth)
- Names of land masses where research will occur (e.g., islands, rookeries).

3. **Attach File**: Include a map(s) to scale that clearly shows the location of your proposed activity. If requested, provide a shapefile or Google Earth kmz/kml with lat/long data and the associated basic metadata.

*Take Table

The take table summarizes the **estimated number of animals** you expect to encounter **annually** during research. See the sidebars on the following pages for guidance on how to count animals.

Columns you will fill out in the take table in APPS:

1. **Select**: Leave this box blank unless you need to copy, move, or delete the row.

2. **Species**: Use the drop down list. The GA is for non-ESA listed species only. You **cannot** select endangered or threatened species.

3. **Listing Unit/Stock**: Select the applicable stock. Only choose Range-wide if your location has multiple stocks of the same species and you cannot distinguish them while in the field.

How to count takes of pinnipeds

Count 1 take per pinniped per day for those **hauled-out animals** that react to the research, regardless of the number of responses, including:

- Movements of twice the animal's body length or more,
- Changes of direction greater than 90 degrees, or
- Retreats (flushes) to the water.

Count 1 take per animal per day for those **pinnipeds in water** that exhibit a noticeable adverse behavioral response from your activities.

Do not count alert behaviors such as:

- Turning head towards the disturbance,
- Craning head and neck while holding the body rigid in a u-shaped position,
- Changing from a lying to a sitting position, or
- Brief movements of less than twice the animal's body length.

4. **Production/Origin**: Select "Wild."

5. **Life Stage**: Select from the drop-down list. You may enter take information for more than one life stage (e.g., adult and juvenile) on separate rows or select a combination of life stages.

6. **Sex**: Select from the drop-down list. If your activity targets only one sex, indicate which. Otherwise select Male and Female.

7. **Expected Take**: This represents a **reasonable estimate** of the number of animals you will encounter, **annually**. Under the GA, you will not be limited to this number or penalized if you exceed this number.

8. **Take Action**: Select Harass.

9. **Observe/Collect Method**: Select the method of observation (e.g., "survey, vessel"). Select only one observe/collect method per row. If you will be approaching animals from a boat to fly UAS surveys, select "survey, aerial/vessel."

10. **Procedures**: A separate pop-up window will appear with a species-specific list of activities. Hold down the Control key to select all activities to be performed concurrently on the same animals.

    a. Choose "Other" if your proposed activity is not listed. In the Details box (see below), briefly describe what the Other means.
    b. Use "Unintentional Harassment" if you may unintentionally harass non-target, non-ESA listed marine mammals during your research.

How to count takes of cetaceans

Count every cetacean approached regardless of whether a behavioral reaction has occurred.

During vessel surveys, only count 1 take per animal per day including all approaches.

An "approach" is defined as a continuous sequence of maneuvers involving a vessel, equipment, or researcher's body, including drifting, directed toward a cetacean or group of cetaceans within 100 yards for non-ESA-listed baleen whales and 50 yards for all other cetaceans.

During aerial surveys (manned or UAS) flown at an altitude lower than 1,000 feet, count 1 take per animal observed per day, regardless of the number of passes over the same animal.

11. **Begin Date**: Populated with the Begin Date you entered on the Project Information page. You may change the date to coincide with a specific project time that is shorter than the overall duration of the project.

12. **End Date**: Populated with the End Date entered on the Project Information page. You may change the date to coincide with a specific project time shorter than the overall duration of the project.

13. **Details**: Enter up to 255 characters to provide details on each take table line. This is especially useful to clarify age class, takes, specific activities, or projects.

*Anticipated Effects on the Environment

1. Will you be working in or near areas with unique environmental characteristics or important scientific, cultural or historical resources? Yes or no.

   Examples include:
   - Animals used for subsistence
   - Archaeological resources
   - Critical Habitat of ESA-listed species
   - Essential Fish Habitat including wetlands, coral reefs, sea grasses, and rivers
   - Federally recognized Tribal and Native Alaskan lands, cultural or natural resources, or religious or cultural sites
   - Marine Protected Areas
   - Minority or low-income communities
   - National or State Parks
   - National Marine Sanctuaries and National Monuments
   - National Historic Landmarks
   - Sites listed in or eligible for listing in the National Register of Historic Places
   - Wild and Scenic Rivers
   - Wilderness Areas
   - Wildlife Refuges

   a. If yes, please list those areas. As applicable, mention if you will need to or have already obtained permission (licenses, permits, authorizations) to work in these areas. (up to 1,200 characters)

   b. How would your activities affect such resources? What measures will you take to ensure your work does not cause loss or destruction of such resources? (up to 1,200 characters)

c. For marine mammal activities in Alaska or Washington, how will you ensure your project does not adversely affect the availability (e.g., distribution, abundance) or suitability (e.g., food safety) of marine mammals for subsistence uses? (up to 800 characters)

2. Discuss if your activities have the potential to impact the physical or biological environment, in particular coastal and marine environments. Impacts can be positive or negative. (up to 2,000 characters)
Examples of potential impacts include:
   - Altering substrate while anchoring vessels and buoys
   - Using bottom trawls or other types of nets
   - Erecting blinds or other structures
   - Ingress and egress of researchers
   - Injuring or killing benthic organisms (e.g., sea grass, corals)
   - Altering the physical or chemical characteristics of water (e.g., oil spills)
   - Affecting a species' abundance or distribution

3. a. Does your project involve activities known or suspected of introducing or spreading invasive species, intentionally or not? Examples include transporting animal, discharging ballast water, and using boats/equipment at multiple sites. Yes or no.

   b. Describe measures you would take to prevent the possible introduction or spread of non-indigenous or invasive species, including plants, animals, microbes, or other biological agents. (up to 1,200 characters)

4. a. Will your activities involve collecting, handling, or transporting potentially infectious agents or pathogens, such as biological specimens (animals, blood, tissues)? Yes or no.

   b. Will your activities involve using or transporting hazardous substances, such as toxic chemicals? Yes or no.

   c. If yes to either question, describe the protocols you will use to ensure that public health and human safety are not adversely affected, such as by spread of zoonotic diseases, chemical injuries, or contamination of food or water supplies. (up to 1,200 characters)

5. Do your activities involve equipment (e.g., scientific instruments) or techniques that are untested, or have unknown or uncertain impacts on the biological or physical environment? Yes or no.

   If yes:
   a. Briefly describe the equipment or techniques and provide any information about the use of these in your study area and/or with other taxa and what is known about their impacts. (up to 1,200 characters)

   b. Discuss the degree to which they are likely to be adopted by others for similar activities or applied more broadly. (up to 800 characters)

*Project Contacts

The person entering the application in APPS will automatically be assigned the following roles: **Applicant/Permit Holder, Principal Investigator (PI),** and **Primary Contact**.

- You may need to change or add personnel. See Chapter 2 for directions on how to change who is assigned to these roles.
- Use the guidance below to help you decide who should have what role.
- To prevent duplicate entries, **ALWAYS search APPS for the person before entering a new contact.** Start with only putting the last name in APPS search box.
- Include a table with the names of the PI and Co-Investigators (CIs), and the specific procedures they will oversee or conduct (see example Table 2). **Attach the table on the Supplemental Information page**.
- As you add personnel, **check whether each person already has a Qualifications Form (QF) in APPS.** It will appear next to their name once you add them to your Contacts page. If there is not a QF in APPS, then attach one for the PI and each CI. See Qualifications and Experience below.

Descriptions of Personnel Roles

A project must have a **Responsible Party if the Applicant/Permit Holder is an organization, institution, or agency**. The Responsible Party or Applicant/Permit Holder is an official who has the legal authority to bind the organization, institution, or

agency and is ultimately responsible for the activities of any individual operating under the authority of the permit.

The **Principal Investigator** (PI) is the individual primarily responsible for the take and any related activities conducted under the LOC. There can only be one PI on an LOC. The PI:

- Must have qualifications, knowledge, and experience relevant to the activities authorized by the LOC.
- Must be on site during activities conducted under the LOC unless a Co-Investigator is present to act in place of the PI.
- May also be the Applicant/Permit Holder and Primary Contact.

The **Primary Contact** is the person primarily responsible for correspondence during the application review process and after an LOC is issued. Typically this person administers the LOC, requests amendments/modifications (e.g., personnel changes), and submits reports. The Primary Contact may also serve other roles on the permit (e.g., Applicant/Permit Holder, PI, CI).

The Applicant/Permit Holder or Responsible Party, PI, and Primary Contact will have access to APPS to enter and edit the application, submit reports and modification requests, and will receive automatic emails from APPS.

Co-Investigators (CIs) are individuals who are qualified and authorized to conduct or directly supervise activities conducted under an LOC without the on-site supervision of the PI.

- You must add CIs to the application if the PI will not always be present during the permitted activities.
- CIs can also be added or removed once an LOC has been issued.

Research Assistants (RAs) are individuals who work under the direct and on-site supervision of the PI or a CI. RAs cannot conduct permitted activities in the absence of the PI or a CI. RAs do not need to be named in the application or LOC.

Unmanned Aircraft Systems (UAS) Pilots are persons who have their FAA-certification to fly UAS and experience piloting UAS. A CI or the PI with marine mammal experience may be qualified to serve in this role. In other cases, you may designate

someone as a UAS Pilot who is tasked with only that role and does not have marine mammal experience.

Personnel for UAS

To fly UAS, you must have: 1) someone with experience working with the target species in the wild, and 2) someone who is FAA-certified to conduct or oversee UAS flights with approximately 5 hours of flight experience. These may be satisfied by one or more persons, depending on the qualifications of your team. The following scenarios in Table 2 describe the personnel roles for UAS that you may request based on their qualifications.

Table 2. UAS Personnel

Scenario 1: Species expert who is also an FAA-certified UAS pilot

If the person has:	They may be named as:
Experience working with the subject species/taxa in the wild **and** UAS experience with an FAA UAS certification	**PI or CI to supervise and operate UAS**. No separate UAS Pilot required to be named in the LOI.

Scenario 2: Species expert (PI or CI) accompanied by an FAA-certified UAS pilot

If the person has:	They may be named as:
Experience working with the subject species/taxa in the wild, but no UAS experience	**PI or CI to supervise UAS**. A separate UAS Pilot must be named for the UAS operation.
UAS experience and FAA UAS certification but no marine mammal experience	**UAS pilot to operate the UAS or directly oversee operation** as the remote pilot in command. The UAS pilot must be supervised by the PI or a CI with marine mammal experience.

Note: Other personnel who are not FAA-certified may manually operate the UAS (e.g., for training purposes) provided the FAA certified pilot designated on the permit directly oversees the UAS operation.

Qualifications and Experience

The PI and each CI must have a Qualifications Form (QF). Previously we accepted CVs, resumes, and biosketches, but often these did not include sufficient information

about the person's field experience to demonstrate they were qualified in the proposed take activities.

Once you fill out a QF and attach it to your profile in APPS, you won't need to upload a new QF unless you acquire new skills, your level of experience changes, or 10 years has passed. Each contact should only have **one** QF file in their profile; it will apply to all LOCs or permits they are affiliated with. They may replace the QF with an updated version when they gain new experience.

Persons authorized as the PI or CIs must have qualifications corresponding to their duties. If you do not provide sufficient information, we will not authorize the person(s).

In addition, **you must submit a table (see Table 3) defining the PI and CI roles** and activities to be performed.

Table 3. Example Personnel Roles

Name/Affiliation	Role	Activities
John Smith, Ph.D., University, City, State	Principal Investigator	Supervise and perform all activities under the LOC, except UAS pilot
Jane Doe, Institution, City, State	Co-Investigator	Conduct photo-ID and behavioral observations
Bob Smith, City, State	UAS pilot	UAS pilot accompanied by the PI or a CI

Submit Application

See Chapter 2 for how to submit your application in APPS and check on its status.

Additional Information

What types of research usually qualify as Level B harassment?

- Behavioral observations
- Photo-identification/photogrammetry
- Aerial surveys, manned or unmanned (except those over pinniped rookeries at altitudes < 1,000 feet)
- Vessel surveys
- Other activities may also qualify – contact us if you have questions.

What are a Letter of Intent and a Letter of Confirmation?

A Letter of Intent (LOI) is the application you submit. If your activities qualify, you will receive a Letter of Confirmation (LOC) that allows you to conduct your research.

What are the advantages of applying under the GA?

The GA is an expedited process. It does not require a 30-day public comment period, unlike other permits.

When should I apply?

At least 4 months before your project will begin, preferably 6 months prior.

What is the process for getting an LOC?

1. Follow these instructions and contact the NMFS Permits and Conservation Division with any questions.
2. Submit your LOI via APPS. A permit analyst will review your LOI and contact you if additional information is needed.
3. Address any questions within 60 days or your LOI will be withdrawn. ‘
4. Once we consider your LOI complete, we will draft the LOC and supporting documentation, including the National Environmental Policy Act analysis and other information.
5. The Division Chief will sign the LOC if your proposed activities are for *bona fide* research and Level B harassment only.
6. Keep a copy of your LOC with you during field research.

What is the process for requesting an amendment to an LOC?

Use APPS to request an amendment to your LOC. You'll need to provide a description of your proposed changes and include all the necessary details for those changes. Use these application instructions as a guide. For example, changes to your objectives will require you discuss all the points in the Project Purpose section. Additions to personnel require Qualifications Forms and descriptions of their roles.

What if I want to conduct research on endangered or threatened species or conduct research that exceeds Level B harassment?

You should apply for a scientific research permit. Visit our scientific research permit web page or use the APPS Pre-Application Guide to start an application.

Applicable Laws and Regulations

Under section 104(c)(3)(C) of the MMPA, as amended, persons may be authorized to take marine mammals in the wild by Level B harassment, as defined in 50 CFR 216.3, for purposes of *bona fide* scientific research. Interested persons are required to submit a Letter of Intent in accordance with the interim final rule published on October 3, 1994, and submit certain information outlined at 50 CFR 216.45(b) under the General Authorization and provided in these instructions. Under NEPA, Federal agencies must assess the effects of federal actions on the environment.

The LOI and any associated documents, including any reports required under the GA, are considered public information and as such, are subject to the Freedom of Information Act.

Paperwork Reduction Act Statement

A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with an information collection subject to the requirements of the Paperwork Reduction Act of 1995 unless the information collection has a currently valid OMB Control Number. The approved OMB Control Number for this information collection is 0648-0084. Without this approval, we could not conduct this information collection. Public reporting for this information collection is estimated to be approximately 10 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection. All responses to this information collection are required to obtain an LOC under the GA pursuant to the MMPA, NEPA, and their implementing regulations. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden to the Chief, Permits and Conservation Division, Office of Protected Resources, F/PR1, NOAA/National Marine Fisheries Service, 1315 East-West Highway, Silver Spring, MD 20910; email nmfs.pr1.apps@noaa.gov.