

**¹Supporting Statement A for
Paperwork Reduction Act Submission**

OMB Control Number 1018-0124

**Migratory Bird Subsistence Harvest Household Survey
Forms 7-FW-100, 7-FW-101, 7-FW-102, 7-FW-103, 7-FW-103a, and 7-FW-103b**

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

The Migratory Bird Treaty Act (16 U.S.C. 703-712) and the Fish and Wildlife Act of 1956 (16 U.S.C. 742d) designate the Department of the Interior as the key agency responsible for managing migratory bird populations that frequent the United States and for setting harvest regulations that allow for the conservation of those populations. These responsibilities include gathering accurate geographical and temporal data on various characteristics of migratory bird harvest. We use those data to promulgate harvest regulations. Annually, we adjust harvest regulations as needed to provide a maximum of subsistence harvest opportunity while keeping migratory bird populations at desired levels.

The Migratory Bird Treaty Act Protocol Amendment (1995) (Amendment) provides for the customary and traditional use of migratory birds and their eggs for subsistence use by indigenous inhabitants of Alaska. The Amendment, however, states that its intent is not to cause significant increases in the take of species of migratory birds relative to their continental population sizes. A May 20, 1996, submittal letter from the Department of State to the White House accompanied the Amendment and specified the need for harvest monitoring. The letter stated that the Fish and Wildlife Service, the Alaska Department of Fish and Game, and Native organizations cooperatively would collect harvest estimates within the subsistence eligible areas. Harvest survey data help ensure that customary and traditional use of migratory birds and their eggs for subsistence use by indigenous inhabitants of Alaska does not significantly increase the take of species of migratory birds relative to their continental population sizes.

From 1989 to 2004, we monitored subsistence harvest in Alaska through the use of annual household surveys in the most heavily used subsistence harvest areas; e.g., Yukon-Kuskokwim Delta. In 2004, we began monitoring subsistence harvest in subsistence eligible areas Statewide. We presently rotate survey areas due to budget constraints. This monitoring enables us to track significant changes or trends in levels of harvest and user participation.

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

We gather information on the annual subsistence harvest of 54 species of birds (including geese, ducks, swans, cranes, loons, seabirds, shorebirds, and upland game birds) through surveys of households in the subsistence eligible areas of Alaska. Annually, local village resident surveyors produce lists of all households in each village and provide survey forms to randomly selected households. We combine the estimates of harvest per household with the complete list of households in the subsistence eligible areas to obtain estimates of the total

annual harvest. We use four forms to collect the harvest information. We will aggregate all information collected and use it only for statistical purposes. We do not arrange or retrieve forms by a personal identifier.

Both Federal and State authorities have used the information collected to develop harvest regulations and to monitor the effects of harvest regulations on harvests of individual bird species. The Alaska Migratory Bird Co-Management Council (AMBCC), a Statewide management body consisting of one Federal member, one State member, and 11 Alaska Native members, each component serving as equals, has used this information to make recommendations in regulations to the Service Regulations Committee (SRC). Annually, we have adjusted harvest regulations as needed to provide a maximum of subsistence harvest opportunity while keeping migratory bird populations at desired levels. Harvest survey data has helped ensure that customary and traditional subsistence use of migratory birds and their eggs by indigenous inhabitants of Alaska does not significantly increase the take of migratory birds relative to their continental population sizes. Information obtained has also helped give the Service insight into the status of the many species involved. The information has also been used by nongovernmental organizations in monitoring the welfare of the migratory bird resource in Alaska and internationally.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology; e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].

These forms do not lend themselves to placement on the Internet or electronic submission. Much of the improved information collection and reporting technology that is commonplace in the contiguous 48 States does not exist in coastal Alaska due to the remoteness of villages, marked differences in lifestyles, and social and economic conditions in these villages. The older members of the households often do not read or write English, so use of automated technology would make them reliant on younger household members to fill out the form electronically, potentially resulting in a loss of reporting accuracy. In addition, if we put the survey forms online, we might receive responses from households who were not randomly selected for the survey. This would invalidate (i.e., bias) our survey results and complicate our efforts to obtain reliable harvest information to use in setting harvest regulations

4. Describe efforts to identify duplication.

The Alaska Department of Fish and Game, Native organizations, local and regional government entities, and private contractors have collected information on subsistence harvest of migratory birds and eggs in the past. However, this information is (1) not current; (2) insufficiently detailed or imprecise; i.e., it is not useful for regulations setting; and (3) survey methodologies have differed; i.e., information has not been comparable across regions.

A very small amount of duplication exists between the national Migratory Bird Harvest Information Program (HIP) (which is approved under OMB control number 1018-0015) and this subsistence harvest survey during the fall season. This duplication occurs because subsistence hunters are required to buy a State duck stamp, which automatically enrolls the stamp purchaser in HIP. If the hunter is selected to be surveyed by HIP, as well as by the subsistence harvest survey, the hunter's harvest will essentially be counted twice. At present, this

duplication is not significant in most villages, because, other than in the hub communities, the vast majority of subsistence hunters are not buying State hunting licenses and duck stamps. In the future, if they do buy State hunting licenses and duck stamps as the law requires, we will have more duplication in our sample frames.

We are considering recommendations for eliminating this duplication by separating the HIP sample frame from the subsistence sampling frame. Under this recommendation, the subsistence sampling frame would remain the same: all subsistence hunters in subsistence areas of Alaska during all hunting periods, including fall and winter. However, the HIP sampling frame and survey would cover only the Alaska hunters who do not reside in subsistence eligible areas, as determined from the residence address they provide when they buy a duck stamp and register for HIP.

The HIP information cannot be used or modified for measuring the fall harvest. Since so few hunters presently buy State hunting licenses and duck stamps, the sample size would be too small to generate a meaningful estimate. Most of the subsistence harvest occurs in areas where virtually no one buys duck stamps. Because this harvest is so large and significant in the national picture, accurate estimates of this harvest are crucial to the regulation setting process and to protection of the birds. In addition, HIP does not include the fall and winter harvest of species of concern as well as non-waterfowl species common in Alaska.

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

This information collection will not have a significant impact on small entities because it involves only individual households in subsistence eligible areas of Alaska. In addition, we conduct this survey in a way that ensures that respondents spend minimal time completing the survey.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this information were not collected, our ability to develop and issue regulations allowing controlled subsistence hunting of migratory birds would be greatly weakened. The health and well-being of migratory bird populations demand that harvests be commensurate with population size. If these surveys were not conducted, the lack of accurate assessment of migratory bird harvests would logically dictate restrictive hunting regulations, with a loss in subsistence hunting due to only vague knowledge of the effects of subsistence hunting on migratory bird populations and fear of possible over harvest.

In situations with some sea ducks and nongame species, in which we are uncertain of population size, it is even more important to annually monitor the subsistence harvest to help ensure the species is not put at risk by over harvest. In these cases, annual harvest monitoring will help the Service take educational and regulatory steps, if necessary, to protect the species.

In addition, the Amendment states that it is not the intent of the Amendment to cause significant increases in the take of species of migratory birds relative to their continental population sizes. If this information were not collected, the Service would have no way of knowing whether or not significant increases were occurring as a result of the subsistence harvest. Therefore, the Service would not be able to fulfill its obligation under the law.

If we conduct the subsistence harvest survey less frequently than at yearly intervals with collections of forms three times per year, it would be impossible to adequately monitor the effect of that year=s subsistence hunting on the status of migratory birds. Migratory bird populations can change substantially between years as a result of droughts, floods, freezes, or other conditions. Subsistence harvests can vary substantially from year to year based on bird migration patterns, socioeconomic factors, and river and sea ice conditions, which affect access to birds. Annual subsistence harvest estimates may be used alongside annual estimates of national harvest (HIP) as part of the annual promulgation

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- * requiring respondents to report information to the agency more often than quarterly;**
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
 - * requiring respondents to submit more than an original and two copies of any document;**
 - * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
 - * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
 - * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
 - * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Our survey respondents report information three times per year: the beginning of July for the spring season (April 1 – June 30); the beginning of September for the summer season (July 1 – August 31); and the beginning of November for the fall season (September 1 – October 31). In southern coastal Alaska, the fall season is a fall/winter season lasting from September 1 – March 31, so reporting is in early April of the following year. Therefore, for the second half of the year, (July 1 – December 31) reporting is more often than quarterly. However, for the first half of the year, no reporting is required for most areas, and for southern coastal Alaska, only one report is required. Reporting occurs when it does, to correspond to the seasons when the birds are in Alaska and to when they are hunted for subsistence.

- 8. Provide the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice (or in response to a PRA statement) and describe actions taken by the agency in response to these comments.**

Describe 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. [Please list the names, titles, addresses, and phone

numbers of persons contacted.]

On June 21, 2006, we published in the Federal Register (71 FR 35690) a notice requesting public comment on this information collection for 60 days ending August 21, 2006. One comment was received in response to this notice. The commenter did not believe that the information provided by respondents was truthful and objected to the use of taxpayer dollars for the surveys.

We collect this information from people who are part of subsistence-based, Alaska Native cultures, whose ancestors have relied on migratory birds for food for thousands of years to sustain them physically, emotionally, and spiritually. These birds continue to be an important part of the Alaska Native diet in non-roaded, remote parts of Alaska, particularly in springtime. We believe that the information is basically honest and truthful, because: (1) the reported bird species harvest information corresponds to the species actually known to be in the areas surveyed; (2) the harvest information is relatively consistent from year to year, by time period and region, and the harvest trends have generally tracked the bird population trends; and (3) people have an incentive to accurately report their harvests, because they know the information is used to manage the birds they depend on for food. They also know that documenting their customary and traditional dependence on birds is important, especially in times of resource shortage. Harvest survey information aids in promulgating regulations that help protect the birds. Therefore, taxpayer dollars that pay for harvest surveys are helping protect birds that people depend on for food as well as for enjoyment by present and future generations.

In October 2000, the Alaska Migratory Bird Co-Management Council (Council) formed an ad hoc subsistence harvest survey technical committee to recommend a design and a set of procedures for subsistence harvest monitoring in the migratory bird subsistence eligible areas of Alaska. (Information on the formation of the Council was published in the Federal Register (67 FR 53511) on August 16, 2002.) The members of this harvest survey committee are from the Service, the State of Alaska Department of Fish and Game (ADF&G), and the Native component of the Council. They include Native representatives/contractors and Native employees of the National Wildlife Refuge System, who live in, travel frequently to, and administer the survey in some of the regions from which harvest information is obtained. The committee has met several times per year since its formation. Two outside peer reviewers and a statistical consultant also offered advice. Representatives have provided information on availability of data and recommendations on survey methodology, including sample frame, data to be collected, frequency of collection, reporting format (survey forms), and survey administration.

In October 2003, the Council approved the technical committee's recommendations for a Statewide migratory bird harvest survey. These recommendations include a goal of survey consistency and standardization across regions of Alaska, a Statewide administrative structure, and a standardized harvest survey manual or handbook. The Statewide survey was first conducted in 2004 and has continued in 2005 and 2006.

Consultation with representatives of those from whom information is obtained has also occurred at Council meetings. The Council consists of Native representatives from each of the subsistence eligible areas of Alaska. Native employees of the National Wildlife Refuge System may also attend these Council meetings. Harvest survey reports are given and issues routinely discussed at these meetings.

In 2003, we estimated the burden for each form by talking with employees, contractors, and surveyors who administer the survey. Seven of these people were consulted again in 2006, to see if the burden estimates were still correct. All of these people are also either migratory bird hunters themselves, and/or they participate in the associated migratory bird subsistence culture. We have adjusted our burden estimates based on their input

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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

We do not provide any payments or gifts to respondents.

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

We assure respondents that we do not write names on survey forms and that we do not report information from the survey at the household level. This is one of the instructions to the surveyors, whether they are Service employees or contractors. In all of our training and outreach materials, used in-house and provided to contractors, we stress "no names on survey forms."

Longtime agency policy (dating back over 20 years) has been that all harvest data are anonymous at the household level. We believe that households would no longer provide harvest data if this confidence were broken. This would affect our findings by causing unit nonresponse to be unacceptably high, thus compromising the data set and yielding inaccurate harvest estimates.

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.

Not applicable. We do not ask questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The total annual hour burden estimate for all of the forms comprising the Migratory Bird Subsistence Household Survey is 4,516 hours. We estimate the approximate dollar equivalent of an applicant's burden hour to complete the survey forms to be \$8.00. Therefore, the total dollar value of the annual burden hours is \$36,128.

For form 7-FW-100, the local surveyor is usually familiar enough with the community and its bird and egg harvest patterns to put the household in a hunting category without asking the household. Occasionally, especially in the larger communities, the surveyor asks the household, asks neighboring households, or asks community leaders what hunting category to place that household in. Since this process takes an average of one minute per household, and since there are approximately 23,000 households in the subsistence eligible areas of Alaska, this totals 383 hours. At \$8 per hour, this amounts to \$3,064.

For form 7-FW-101, the local surveyor takes each household on Form 7-FW-100 and categorizes it on Form 7-FW-101 according to activity level. We estimate that it takes each surveyor an average of 30 minutes to transfer the information from form 7-FW-100 to form 7-FW-101. With an estimated 182 surveyors in approximately 182 communities, we estimate 91 hours total annual burden. At \$8 per hour, this amounts to \$728.

For form 7-FW-102, up to 14,000 households will have to be asked permission in order to get a sample size of 11,500 households to participate in the survey. We ask permission once per year. It will take the surveyor an average of 5 minutes per household to determine whether or not that household agrees to participate in the subsistence harvest survey. With an estimated 14,000 households responding to the permission slip, this amounts to 1,167 hours total annual burden. At a cost of \$8 per hour, this amounts to \$9,336.

The specific survey form that a household receives depends on that household's location. We estimate approximately 11,500 of the approximately 23,000 households in the subsistence eligible areas will participate in the survey. Approximately 13,500 (59%) of the 23,000 households are located in areas which will receive Form 7-FW-103. Approximately 85% of the estimated total migratory bird harvest occurs in these areas, so Form 7-FW-103 is the main form. However, to simplify the survey and avoid species confusion, we have designed an interior Alaska survey form (Form 7-FW-103a) which has only 38 bird illustrations, and a southern coastal survey form (Alaska Peninsula/Aleutians-Pribilofs/Chugach/Kodiak Island) (Form 7-FW-103b) on which four of the bird species differ and the fall hunting period extends into winter months. An estimated 2,700 (12%) of the 23,000 households are located in interior Alaska, where 8% of the total migratory bird harvest occurs; these households will receive Form 7-FW-103a. About 6,800 (29%) of the 23,000 households are located in southern coastal Alaska, where about 7% of the total migratory bird harvest occurs. These households will receive Form 7-FW-103b. We will collect these surveys three times per year in spring, summer, and fall or fall/winter. We estimate the reporting burden to average 5 minutes per respondent for the Migratory Bird Subsistence Harvest Household Survey. With an estimated 11,500

respondents filling out the form three times annually, the annual burden hours total 2,875 hours.

Form	Number of Respondents	Annual No. of Responses	Avg. Time/Response	Total Annual Burden Hours	Total \$ Value of Annual Burden Hours
7-FW-100	23,000	23,000	1 minute	383	\$ 3,064
7-FW-101	182	182	30 minutes	91	728
7-FW-102	14,000	14,000	5 minutes	1,167	9,336
7-FW-103, a, b	11,500	34,500	5 minutes	2,875	23,000
TOTALS	48,682	71,682		4,516	\$ 36,128

13. Provide an estimate of the total annual [nonhour] cost burden to respondents or recordkeepers resulting from the collection of information.

There is no nonhour dollar cost burden to respondents. There is no fee to participate in the survey or any other costs to respondents associated with the survey.

14. Provide estimates of annualized costs to the Federal Government.

We estimate an average cost of \$440,000 for the Federal Government to administer this information collection. The following shows the estimated annual cost to the Federal Government, in terms of the actual expenditure records for past years:

	FY 2003	FY 2004	FY 2005	FY2006
1) Cooperative Agreement, Technical assistance	0	84,000	89,000	112,371
2) Projects	0	221,000	241,953	187,592
3) Harvest Survey Support	132,046	138,875	130,220	112,643
TOTALS	\$132,046	\$443,875	\$461,173	\$412,606

Further details for the above costs are shown in Table 1.

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

Based on experience over the last several years, we have reduced the number of subsistence-eligible communities and households. In addition, we corrected the annual number of responses for form 7-FW-100 to account for each household that provides a response (23,000). Although our total responses increased from 55,376 to 71,682 (+16,306), we have reduced the number of annual burden hours. Based on feedback from our outreach, we have revised our

burden estimates for completing form 7-FW-100, which resulted in a reduction of 594 burden hours (from 5,110 to 4,516).

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

We will continue to conduct the Subsistence Migratory Bird Harvest Household Survey on an ongoing annual basis, funding permitting. Presently, we are surveying the Yukon-Kuskokwim Delta annually due to the large numbers of birds and species of concern taken there--approximately one-half of the Statewide spring harvest. Due to insufficient funds, we are rotating the remaining harvest areas, surveying each area every other year until the funding

level improves. Schedule for the Subsistence Household Survey:

December-February

- Survey field personnel are trained. These are Service employees who work for the National Wildlife Refuge System (Refuge Information Technicians) and contractors who work for Native organizations and the Alaska Department of Fish and Game, which are both part of the Alaska Migratory Bird Co-Management Council (AMBCC).
- Outreach is conducted and permission is sought and obtained from village governments

March-April

- Village surveyors are contracted with and trained by survey field personnel.
- Village surveyors complete the household enrollment forms (Forms 7-FW-100 and 101).
- Obtain household permission for the harvest survey (Form 7-FW-102)

April 1 - October 31

- Survey forms (Form 7-FW-103) are distributed at the beginning dates of each survey period and picked up immediately after the ending dates, as follows:

Survey Period

Spring April 1-June 30

Summer July 1 - August 31

Fall September 1 - October 31 (in southern coastal areas, there is a very small winter harvest, so this date is extended to March 9 of the following year; see Form 7-FW-103b)

November - April

- Data are audited, tabulated, and analyzed. Estimates of harvest are made based on survey forms received and stratification information provided on Form 7FW-101, Households Separated by Hunting Category – Village Household Survey, Household Selection by Activity Level.

February - July

- Data are published. Reports must be prepared in time for publication in Pacific Flyway Data book.

July - December

- More detailed reports are published, showing and analyzing data trends over time for each region, by species and by smaller geographic units within the region.

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

We will display the OMB control number and expiration date on the forms.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.