

Supporting Statement A for Paperwork Reduction Act Submission

OMB Control Number 1018-0124 Alaska Migratory Bird Subsistence Harvest Household Survey FWS Form 3-2380 and FWS Forms 3-2381-1 thru 3-2381-4

Terms of Clearance: None.

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

The Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712, Treaty) 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: (1) managing migratory bird populations that frequent the United States and (2) setting harvest regulations that allow for the conservation of bird populations. These responsibilities include gathering accurate spatial and temporal data pertaining to the harvest of migratory birds. The Fish and Wildlife Service (we, the Service) use those data to publish harvest regulations. Annually, we adjust harvest regulations as needed to provide maximum subsistence harvest opportunities while accounting for bird population status and the population desired level.

The Treaty Protocol Amendment (1995) (Amendment) provided for the customary and traditional use of migratory birds and their eggs for subsistence use by indigenous inhabitants of Alaska. The Amendment 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 letter of submittal (May 20, 1996) from the Department of State to the White House accompanied the Amendment and specified the need for harvest monitoring. The letter stated that the Service, the Alaska Department of Fish and Game (ADFG), and Alaska Native organizations would cooperatively collect information to produce harvest estimates for the subsistence eligible areas. Harvest survey data help ensure that subsistence customary and traditional uses of migratory birds and their eggs by indigenous inhabitants of Alaska do not significantly increase relative to the continental bird population sizes.

From 1989 to 2004, we monitored subsistence harvest in Alaska through annual household surveys in the Yukon-Kuskokwim Delta and Bristol Bay regions, which are the most heavily used subsistence harvest areas. In 2004, we began monitoring subsistence harvest in all subsistence eligible areas of Alaska in a rotation schedule so not all areas and villages are surveyed every year. This harvest monitoring enables us to track trends in levels of harvest and the importance of migratory birds as subsistence resources.

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.

In 2008, we contracted with the Alaska Department of Fish and Game (ADFG), Division of Subsistence, to conduct an evaluation of the Alaska Migratory Bird Co-Management Council

(AMBCC) subsistence harvest assessment program and to provide recommendations for streamlining the program (Naves et al. 2008). These recommendations were analyzed by the AMBCC Harvest Survey Committee (HSC) and adopted by the AMBCC (June 2008). The AMBCC is a Statewide management body consisting of one Federal member (the Service), one State member (ADFG), and 11 Alaska Native members. The Service, ADFG, and the HSC worked collaboratively to develop revised survey methods and implementation procedures. Modifications to the original survey methods and forms had as objective to: (1) ensure confidentiality of the information provided by households, (2) facilitate data collection, (3) minimize sources of error in reporting and recording, (4) reduce burden on participating households (number of household visits), (5) reduce surveyor effort, (6) optimize data transfer, and (7) facilitate implementation of quality assurance/quality control procedures. The AMBCC established an HSC subcommittee to specifically work on the development and implementation of the revised survey methods. We will conduct a train-the-trainer workshop for field coordinators, and we are preparing for implementation of the revised program in 2010.

We will use FWS Form 3-2380 (Tracking Sheet and Household Consent) and FWS Forms 3-2381-1, 2381-2, 3-2381-3, and 3-2381-4 (Harvest Report) to conduct the survey.

FWS Form 3-2380. This form replaced form 7-FW-102 (Household Permission Slip) used to document household participation in the survey. FWS Form 3-2380 consolidates the permission slips with the regular tracking sheet used by surveyors to keep track of survey work. A field to be completed by the surveyor was added to document “no contact.”

FWS Form 3-2381-1, FWS Form 3-2381-2, FWS Form 3-2381-3, and FWS Form 3-2381-4. These forms replace forms 7-FW-103, 103a, and 103b. We created an additional version of the harvest report that better represents bird species available for harvest in the North Slope region. For all versions, we revised the set of species. The surveyor will complete added fields to clearly identify the village and household survey and the year of harvest, and to indicate if there was no harvest.

We are not seeking OMB approval for previously approved forms 7-FW-100 (Village Harvest Survey Household Enrollment Form) and 7-FW-101 (Village Harvest Survey Household Selection List by Activity Level). We have consolidated these forms into a single form, which will be completed by contracted surveyors without input from individual/household respondents.

This survey relies on collaboration among the Service, the ADFG, and many regional Alaska Native organizations. This survey gathers information on the subsistence harvest in Alaska of about 60 species of birds and their eggs (geese, ducks, swans, cranes, grouse, seabirds, shorebirds, and grebes and loons). Survey information includes species of birds and their eggs taken for subsistence use in each harvest season. Data collection is done by contract with Alaska Native regional organizations, which hire local village residents as surveyors and survey consultants. Regions and villages are surveyed in a rotation schedule. Harvest information is collected every year in selected villages. Selected households are first visited for household invitation to participate in the survey. Two subsequent household visits are done for collection of seasonal harvest data. Households in rural Alaska villages eligible for the subsistence harvest of migratory birds are the primary sampling unit. Local village resident surveyors are hired to compile a list of all permanent households in each village, to provide survey forms to selected households, and to assist households in completing the harvest

report form during a household visit (hardcopy form, face-to-face interaction). The harvest report form is the only way households can voluntarily report their harvest. Households may include comments on their harvest, on the availability of birds, on the survey, or any other subject related to the harvest of birds.

Respondents of the Alaska Migratory Bird Subsistence Harvest Household Survey report information to the Service two times per year. According to the revised survey methods, the timing of the seasonal data collection is based on the regional season of most harvest. Data collection occurs after the end of the season of most harvest and after the end of the other harvest seasons combined. Compared to a household visit at the end of each harvest season as in the original survey protocol (Wentworth 2006), this new approach reduces the number of household visits while minimizing sources of recall bias. Recall bias tend to be more prevalent when respondents have many events to remember, i.e., during the season of most harvest. In general, spring is the season of most bird harvest in rural Alaska although some regions also have important harvest in fall and winter. The timing of seasonal data collection was based on two regional harvest patterns:

- Pacific-Aleutian Seasonal Pattern: a household visit after August 31 to collect spring and summer harvest data and a household visit after March 9 to collect fall and winter harvest data (Kodiak Archipelago, Aleutian-Pribilof Islands, Gulf of Alaska-Cook Inlet, South Alaska Peninsula – part of Bristol Bay, Southeast Alaska).
- Arctic-Northwest-Interior Seasonal Pattern: a household visit after June 30 to collect spring harvest data and a household visit after October 31 to collect summer and fall harvest data (Yukon-Kuskokwim Delta, Bering Strait-Norton Sound, Northwest Arctic, Interior, North Slope, Bristol Bay except South Alaska Peninsula).

Table 1. Seasonal survey coverage.

		<i>Spring</i>		<i>Summer</i>		<i>Fall</i>		<i>Winter</i>					
		1 Apr–30 Jun		1 Jul–31 Aug		1 Sep–31 Oct		1 Nov–9 Mar					
		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Gulf of Alaska/Cook Inlet	O			X		X							X
Kodiak Archipelago	O			X		X							X
Aleutian/Pribilof Islands	O			X		X							X
Bristol Bay (except South AK Peninsula)	O			X		X		X					
South Alaska Peninsula (Bristol Bay)	O			X		X							X
Yukon–Kuskokwim Delta	O			X		X		X					
Bering Strait/Norton Sound	O			X		X		X					
Northwest Arctic	O			X		X		X					
North Slope	O			X		X							
Interior Alaska	O			X		X		X					
Upper Copper River	O			X		X		X					

O = First household visit (household invitation to participate in the survey).

X = Subsequent household visit (seasonal harvest data collection).

Survey data: (1) assists the Service in the development of spring–summer migratory bird harvest regulations; (2) documents subsistence harvest trends and track major changes in harvest; (3) documents the importance of customary and traditional uses of migratory birds by

Alaska rural villages so that subsistence uses will be protected and conducted in a sustainable manner; and (4) assists in the development of management plans by State and Federal agencies. We do not use information from the survey for enforcement purposes. Harvest estimates from the subsistence harvest survey will be available to Federal and State resource management and conservation agencies, the Pacific Flyway Council, Alaska Native organizations, and the villages that participate in the survey.

Both Federal and State authorities use the information collected to develop harvest regulations and to monitor the effects of regulations on harvests of individual bird species. The AMBCC uses this information to make regulation recommendations to the Service Regulations Committee (SRC). Annually, we have adjusted harvest regulations as needed to provide a maximum of subsistence harvest opportunity while accounting for bird population status and the population desired level. This survey also provides data on the population status of many species used for subsistence purposes. Nongovernmental organizations use survey data to monitor the status of migratory bird resources 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].

The harvest report form (hardcopy) is the only way for households to report their harvest. The harvest report form is not available on the Internet and its electronic submission has not been implemented because of conditions particular to rural Alaska villages. Much of the electronic information collection technology that is common in other areas of the U. S. is not viable in rural Alaska due to the remoteness of villages, marked differences in lifestyles, and socioeconomic conditions. Older household members often do not read or write English, so the use of automated technology would make them reliant on other people to fill out the form electronically, potentially resulting in loss of accuracy of the harvest report. In addition, if we put the survey forms online, we might receive responses from households not randomly selected for the survey. This source of bias in data collection would affect survey results and complicate efforts to obtain reliable harvest information to use in setting harvest regulations. The involvement of local village residents in this survey as hired surveyors has largely facilitated communication with households, promoting more accurate harvest reports and village participation in the survey and in the co-management of migratory birds in Alaska.

4. Describe efforts to identify duplication.

The ADFG, Alaska Native organizations, local and regional government entities, and private contractors have collected information on subsistence harvest of birds and eggs. However, this information is (1) not current; (2) insufficiently detailed or imprecise (thus not useful for regulations setting); and (3) survey methods have differed, which may make information not comparable across regions and years.

Minor duplication in migratory bird harvest data collection may exist during the fall season between the nationwide sport hunting Harvest Information Program (HIP) (OMB control number 1018-0023) and the AMBCC subsistence harvest survey. This potential for duplication

occurs because subsistence hunters are required to acquire a hunting permit and State and Federal duck stamps, which automatically enrolls the stamp purchaser in the HIP. If a hunter is selected to be surveyed by HIP as well as by the subsistence harvest survey, the hunter's fall harvest may be reported twice. However, such duplication is likely not significant in most Alaska rural villages because access to permit and stamps is sometimes difficult in rural Alaska and also, a large proportion of subsistence hunters have not adhered to buying hunting licenses and duck stamps. Sample sizes associated with current HIP participation in rural Alaska are too small and cannot provide for meaningful harvest estimates. Because of extremely low participation of Alaska rural residents in the HIP, the AMBCC decided to survey fall harvest to ensure its documentation until adherence to hunting permits and stamps increases in rural villages.

Also, HIP information cannot be used or modified to properly monitor the subsistence fall harvest because: (1) the HIP survey does not include nonwaterfowl species commonly harvested in Alaska for subsistence, and (2) the HIP survey does not include species of conservation concern. The Alaska subsistence harvest accounts for an important proportion of the take in the Pacific Flyway. Accurate estimates of Alaska subsistence harvest are crucial in the regulation setting process and effective management and conservation of migratory birds. We are considering recommendations to eliminate potential overlap between the HIP sampling frame and the subsistence sampling frame. According to these recommendations, the subsistence sampling frame would remain the same (hunters in subsistence eligible areas of Alaska during spring, summer, and fall hunting seasons). However, the HIP sampling frame would cover only Alaska hunters residing in areas not eligible for spring-summer subsistence harvest (eligibility for subsistence harvest can be determined by the residence address that hunters provide when they buy a duck stamp). This recommendation is under consideration while efforts have attempted to address adherence to hunting license and duck stamps in rural Alaska. However, modifying the HIP sampling frame in Alaska to avoid potential duplication in harvest information collection could interfere with efforts to improve adherence to the hunting permit and stamps.

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

Respondents are individual households and this information collection will not impact small entities. We designed the survey methods and procedures to ensure that households spend minimal time completing the survey. This survey can have positive impacts on Alaska Native government bodies, such as tribal or village councils, Native corporations and associations, by providing temporary employment in activities related with survey implementation (field coordinators, surveyors, survey consultants). This survey can also promote participation of villages in the co-management process established by law to promote the long-term sustainability of migratory bird populations used as subsistence resources.

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.

It was not the intent of the Amendment to cause significant increases in the take of migratory bird species relative to their continental population sizes. If subsistence harvest information were not collected, we would have no means to detect significant increases in subsistence

harvest. Therefore, we would not be able to fulfill our obligation under the Migratory Bird Treaty Act, which is an international law.

If this information were not collected, our ability to develop and issue regulations allowing sustainable subsistence hunting of migratory birds would be greatly weakened. The long-term sustainability of migratory bird populations relies on harvests being commensurate with bird population size. The lack of accurate assessment of migratory bird harvests would lead to restrictive hunting regulations because of concerns of over harvest. Hunting regulations that are unnecessarily restrictive would curtail subsistence harvest opportunities and impose hardship on households that rely on subsistence harvest for nutritional and cultural survival. Population sizes are vaguely known for some seaduck species and non-game species. In these circumstances, it is crucial to annually monitor the subsistence harvest to ensure that bird populations are not threatened by over harvest. For species of conservation concern, annual harvest monitoring allows us to implement necessary educational and regulatory efforts to adequately protect and restore bird populations.

The Amendment requires that we conduct the harvest survey annually until further decision, if funding permits. We conduct the subsistence harvest survey yearly with collections of harvest reports two times per year. Because of the rotation schedule of regions and villages, only a small number of villages are surveyed in successive years. If we conducted the survey less frequently, it would be impossible to adequately monitor the effect of that year's subsistence hunting on migratory bird populations because subsistence harvest is variable between years and localities. 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 affecting access to birds. Conducting the survey every year in rotating regions and villages is essential to ensure geographic and temporal coverage that will allow assessment of regional patterns of harvest and harvest variability.

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.

There are no special circumstances that require us to collect this information in a manner inconsistent with OMB guidelines.

- 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 July 6, 2009, we published in the Federal Register (74 FR 31970) a notice requesting public comment on the renewal of this information collection. The 60-day comment period ended on September 4, 2009. We did not receive any comments.

In addition to the Federal Register notice, we conducted outreach with six people who are familiar with the revised survey methods and who have responded to the harvest survey multiple times. All people consulted agreed that this information collection is necessary and has practical utility in (1) documenting the importance of bird harvests in rural Alaska for subsistence uses, (2) fulfilling requirements of the 1995 Migratory Bird Treaty Amendment, and (3) acting as a tool and encouragement to participate in the co-management process of migratory birds in Alaska.

On average, the people consulted agreed that it takes about 5 minutes to determine whether or not a household agrees to participate in the survey (Form 3-2380 "Tracking Sheet and Household Consent"). People offered that the initial contact with households is frequently done by telephone, and that it may take less than 5 minutes to assess the willingness of households to participate in the survey, but sometimes it may take more than 5 minutes if the household asks many questions about the survey. One person emphasized the need to clearly explain the purposes of the survey to enlist household participation.

On average, those consulted agreed that it takes about 5 minutes to complete a seasonal harvest report (FWS Form 3-2381-1-4). People offered that it usually takes less than 5 minutes for nonhunters to complete the form, since they have no harvest to report.

We asked for suggestions to improve the quality, utility, and clarity of the information to be collected. Suggestions offered and our responses follow.

(1) *Investing further efforts in training of local surveyors.* In revising the survey, training of all personnel involved with the survey (including field coordinators and surveyors) was a main priority. The revised survey methods will simplify surveyor tasks and materials as well as offer further training, support, and supervision to field coordinators and surveyors. Training materials specific to field coordinators and surveyors are being prepared to reflect revised

survey methods. A train-the-trainer class for field coordinators and agency personnel will be held in Anchorage, AK, in preparation for the implementation of the revised survey methods in 2010.

(2) *Keeping the villages informed of survey projects and results.* We expect Improvements in village information about survey projects to result from further efforts in training of field coordinators and surveyors. In general, villages are informed of survey results through the process of review of harvest estimates by the AMBCC Regional Councils. Preliminary survey results are currently available at the AMBCC website. Survey personnel will be able to customize this material for presentations at village meetings.

(3) *Promoting communication with the villages in their native language.* Revised training procedures for field coordinators emphasize the importance of communicating with villages and households in their native language, including hiring bilingual local surveyors. A bird identification sheet specific to regions is being developed to assist in species identification issues. We will provide this sheet at the first household visit. We are considering the inclusion of local species names, which may also help in minimizing species identification issues. A list of all regional bird names is being compiled and will be provided to village surveyors to assist households in completing the harvest report.

(4) *Showing drawings of birds in the seasonal harvest report forms in their correspondent seasonal plumage.* The revised harvest report forms (FWS Form 3-2381-1-4) include only birds in breeding plumage in order to keep the survey form somewhat concise. We are assessing the possibility of including drawings of birds in both breeding and winter plumage in the regional bird identification sheets.

(5) *Simplifying permission slips* (Form 7-FW-102 in the original survey methods). Permission slips (Form "7-FW-102" in original survey methods) will be replaced by the "Tracking Sheet and Household Consent Form" (FWS Form 3-2380). Surveyors will complete the form. We designed the form to overcome difficulties found with the previous permission slip form.

(6) *Reducing the number of household visits for collection of harvest reports.* In the revised survey methods, the number of household visits are reduced from three to two. The HSC opted for not implementing a single household visit for harvest report collection because of concerns related to sources of memory bias. Many bird species are taken in the subsistence harvest and respondents may not accurately recollect the species and numbers taken by season given an extended recall period.

We also asked for suggestions to minimize the burden on respondents. One person suggested reducing the number of household visits for collection of harvest reports (see (6) above).

We consulted with:

Molly Chythlook, Bristol Bay Native Association
P.O. Box 210, Dillingham, AK 99576
tel (907) 842-5257. mchythlook@bbna.com

tel (907) 842-5257. fwoods@bbna.com

Frank Woods, Bristol Bay Native Association
P.O. Box 210, Dillingham, AK 99576

Jon Dyasuk, Togiak National Wildlife Refuge
P.O Box 270 MS 569, Dillingham, AK, 99627
tel (907) 842-1063

Eric Trigg, Kawerak Inc.
P.O. Box 948, Nome, Alaska 99762
etrigg@kawerak.org

tel (907) 554-4265. stahbone@kawerak.org

Sandra Tahbone, Kawerak Inc.
P.O. Box 948, Nome, Alaska 99762

Louie Andrew
Yukon Delta National Wildlife Refuge
P.O. Box 346, Bethel, Alaska 99559
(907) 543-1006. louie.andrew@fws.gov

Also, we continually receive input from a number of stakeholders. Consultation with representatives of those from whom information is obtained also occurs routinely at AMBCC meetings held in the spring and fall of each year. Alaska Native representatives from each subsistence eligible area of Alaska provide reports on bird harvests, comments on availability of birds for harvest, harvest survey implementation, and other subjects related to the subsistence harvest of birds. Other stakeholders also attend AMBCC meetings such as Alaska Native employees of the National Wildlife Refuge System, representatives of tribal and village councils, hunters, and employees of non-governmental organizations related to research, conservation, and restoration of bird populations.

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

No payments or gifts are provided 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: (1) no names are written on harvest report forms, (2) survey information is anonymous at the household level, and (3) that survey information at household level is not reported or used for enforcement purposes. No personal information such as SSN is collected. All survey forms are designed to avoid linking harvest reports with household names. Household names are used only in the "Household List and Selection Form" and identified by a numeric code in all other survey forms. Surveyors are consistently instructed to not write names on harvest report forms. Original "Household List and Selection Forms" are destroyed after data analysis is complete.

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.

We do not ask questions of a sensitive nature.

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

On average, 1,973 households were surveyed yearly between 2004 and 2008 (standard deviation = 248). In the revised survey methods, a yearly sample size of 2,300 households is estimated for the next survey years (accounting for modifications to the sampling methods and rotation schedule of regions and villages). The overall household response rate was 77% for the period 2004-2008 (number of households that agreed to participate divided by total number of households contacted; based on 8,158 permission slips available for data analysis). Therefore, a total of 2,829 households will be contacted to achieve a yearly sampling goal of 2,300 households.

We estimate respondents will provide 9,729 responses totaling 811 annual burden hours. We estimate the dollar value of the annual burden hours will be \$19,416. The Bureau of Labor Statistics May 2008 State Occupational Employment and Wage Estimates lists the mean hourly wage for persons in fishing, farming, and forestry occupations in Alaska as \$17.10 (http://www.bls.gov/oes/2008/may/oes_ak.htm#b45-0000). We multiplied the hourly wage by 1.4 to account for benefits in accordance with release USDL 09-1501, December 9, 2009, Employer Costs for Employee Compensation--September 2009 (<http://www.bls.gov/news.release/pdf/ecec.pdf>), resulting in a total hourly cost factor of \$23.94.

Table 2. Consolidated Burden Information

Requirement	Annual No. of Respondents	Total Annual Responses	Completion Time per Response	Total Annual Burden Hours*	Total Dollar Value of Annual Burden Hours*
FWS Form 3-2380	2,829	2,829	5 minutes	226	\$ 5,650
FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, 3-2381-4 (3 seasonal pages)	2,300	6,900	5 minutes	575	13,766
Total	5,129	9,729		811	\$19,416

* rounded

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 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 conduct this survey under contracts with a number of Alaska Native organizations and the ADFG. We estimate an average annual cost of \$536,226 (rounded) for the Federal Government to administer this information collection. Field operations include payment of surveyors and survey consultants, travel, salaries of field coordinators, supplies (printing, copies, telephone, fax), and overhead at Alaska Native organizations. Data management is conducted by the Information Management Shop of ADFG Division of Subsistence and covers salaries (data entry, cleaning, analysis, and archiving, and database maintenance), software licenses, hardware replacement, and overhead. Survey coordination is conducted by the ADFG Division of Subsistence and includes coordination of Alaska Native partners, preparation and oversight of data collection, reporting of survey results, supplies, printing survey materials, and overhead. Cost differences between years reflect variations in travel costs and total number of households to be surveyed according to the rotation schedule of regions and villages.

Table 3. Annual Cost to the Federal Government.

Year	Survey implementation		Survey coordination		Total \$
	Field operations ^a	Data management ^b	Survey coordinator salary ^b	Support to coordination ^{b, c}	
1	\$312,001	\$59,014	\$109,596	\$41,707	\$522,318
2	\$343,846	\$63,247	\$109,596	\$41,707	\$558,396
3	\$316,835	\$59,825	\$109,596	\$41,707	\$527,963
Average					\$536,226

Amounts include indirect costs.

^a Surveyors, survey consultants, travel, field coordinator salaries, supplies.

^b Contracted to ADFG.

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

We are requesting 9,729 responses and 811 burden hours for this information collection. This

is a decrease of 61,953 responses and 3,705 burden hours. There are no changes in requirements for the report form itself and the burden associated with obtaining household permission and reporting harvest has not changed. However, we have eliminated and/or combined some forms and some information will be provided by paid contractors without response from the individual/household. We have also reduced the number of household visits to obtain harvest information.

We are reporting as a program change 23,182 responses and 474 burden hours associated with the eliminated forms.

We are reporting as an adjustment 38,771 responses and 3,231 burden hours. These adjustments reflect modifications to the survey methods and procedures adopted by the AMBCC in 2008 and scheduled for implementation in 2010. Estimated response times did not change.

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

Preliminary survey results and other information materials related to the subsistence harvest of migratory birds and harvest regulations are currently available over the AMBCC website <http://alaska.fws.gov/ambcc/index.htm>. Final survey reports will be available at the AMBCC website and hardcopies will be distributed to Alaska Native organizations involved in the survey where access to the electronic versions may be difficult.

Table 4. Yearly timetable for implementation of the subsistence harvest survey.

Activities	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Administrative procedures												
Yearly FWS budget estimates	X											
Prepare contract modifications & budget allocations		X										
Contracts modification/renewal (regional partners, ADFG) to FWS Contracting & General Services			X	X								
Receive annual budget					X							
Fieldwork preparation												
Field coordinator training/survey materials				X	X							
Village consent (continuing resolution)						X	X					
Village outreach						X	X					
Surveyor contracting and training						X	X					
Distribution of village survey packages						X	X					
Data collection												
1 st Household visit (hh consent, survey materials)							X	X				
2 nd Household visit (harvest report)	X ^a										X ^{b,c}	
3 rd Household visit (harvest report)	X ^c		X ^b				X ^a	X ^a				
Field coordinator send forms to survey coordinator		X ^c	X ^c	X ^b	X ^b				X ^a	X ^a		
Data analysis and review												
Data management and analysis for previous year						X	X	X	X	X	X	
Annual data review by AMBCC Regional Councils	X											X
Release of information												

Activities	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Flyway Council meetings							X				X	
FWS Ecological Service											X	X
AMBCC meetings	X							X				
AMBCC adoption of annual harvest estimates	X							(X)				
Release of yearly final report				X								

^a **Pacific-Aleutian Seasonal Pattern**: Kodiak, Aleutian-Pribilof Islands, South Alaska Peninsula (Bristol Bay region).

^b **Arctic-NW-Interior Seasonal Pattern**: Y-K Delta, Bering Strait-Norton Sound, NW Arctic, Interior, Bristol Bay (except South Alaska Peninsula).

^c **North Slope**: also Arctic-NW-Interior Seasonal Pattern, but surveyed only for spring and summer.

A description of analytical approach is presented in Supporting Statement B, item 2.

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. Certification.

There are no exceptions to the certification statement.

References Cited

AMBCC (Alaska Migratory Bird Co-Management Council). 2003. Recommendations for a statewide Alaska migratory bird subsistence harvest survey. Submitted to the Alaska Migratory Bird Co-Management Council by the Subsistence Harvest Survey ad-hoc Committee. Alaska Migratory Bird Co-Management Council, [Anchorage].

Naves, L. C., D. Koster, M. G. See, B. Easley, and L. Olson. 2008. Alaska Migratory Bird Co-Management Council migratory bird subsistence harvest survey: Assessment of the survey methods and implementation. Alaska Department of Fish and Game, Division of Subsistence, Special Publication No. 2008-05, Anchorage.

Naves, L. C. 2009. Alaska Migratory Bird Co-Management Council migratory bird subsistence harvest survey: revised methods and procedures to be implemented starting in 2010. Draft. Alaska Department of Fish and Game, Division of Subsistence, Anchorage.

Naves, L. C. *In prep*-a. Alaska Migratory Bird Co-Management Council subsistence harvest assessment program 2004–2007 final harvest estimates: draft final report July 24, 2009. Alaska Department of Fish and Game, Division of Subsistence, Anchorage.

Naves, L. C. *In prep*-b. Alaska Migratory Bird Co-Management Council subsistence harvest assessment program 2008 final harvest estimates: draft final report July 24, 2009. Alaska Department of Fish and Game, Division of Subsistence, Anchorage.

Wentworth, C. 2006. Subsistence migratory bird harvest survey handbook 2007; subsistence migratory bird harvest survey handbook for refuge information technicians and survey contractors. Alaska Migratory Bird Co-Management Council, Anchorage.