1Supporting Statement A for
Paperwork Reduction Act Submission

Alaska Migratory Bird Subsistence Harvest Household Survey
FWS Forms 3-2380, 3-2381-1, 3-2381-2, 3-2381-3, and 3-2381-4

OMB Control Number 1018-0124

Terms of Clearance: This request is approved for three years. Prior to resubmission of this request for extension, the agency should update estimates of burden taking into account recent experience with the program.

Response: This request for extension includes updated burden estimates based on 1) public outreach conducted in September 2012; 2) updated mean hourly wage in rural Alaska; 3) revised calculation of the overall participation rate; and 4) number of respondents and responses expected.

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 occur in 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 on the harvest of migratory birds. 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 did not intend to cause significant increases in the take 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 U.S. Fish and Wildlife Service (we, Service), the Alaska Department of Fish and Game (ADFG), and Alaska Native organizations would cooperatively collect information to produce harvest estimates for subsistence eligible areas. Harvest survey data help ensure that 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. The Alaska Migratory Bird Co-Management Council (AMBCC) was formed in 2000 to implement provisions of the Amendment. The AMBCC is composed of representatives from the Service, the ADFG, and regional Alaska Native entities.

From 1985 to 2003, we monitored subsistence harvest in Alaska through annual household surveys in the Yukon-Kuskokwim Delta and Bristol Bay regions, which account for more than one third of the subsistence harvest of migratory birds in Alaska (Wentworth 2007a, 2007b). In 2004, we began monitoring subsistence harvest in all subsistence eligible areas of Alaska (Naves 2010a, 2010b, 2011, 2012). This harvest monitoring enables us to track trends in levels of harvest and the importance of migratory birds as subsistence resources. Bird harvests in areas of Alaska eligible for the subsistence hunt accounts for 86 percent of the Statewide harvest. However, the whole state of Alaska accounts for only 10 percent of harvests in the whole Pacific Flyway (Naves, unpublished results). Accurate estimates of Alaska subsistence harvest are crucial in the regulation setting process and effective management and conservation of migratory birds in the Pacific Flyway as a whole.

2. Indicate how, by whom, and for what purpose the information is to be used.

In 2008-2009, the Subsistence Harvest Assessment Program of the AMBCC was collaboratively revised by the Service, the ADFG, and the AMBCC Subsistence Harvest Survey Committee (AMBCC-HSC) (Naves et al. 2008). Data collection by the revised survey program has been carried out since the 2010 harvest year. No revisions have been made to the program since the last approval by OMB.

This survey relies on collaboration among the Service, the ADFG, and many Alaska Native organizations. This survey collects information on the subsistence harvest in Alaska of about 60 species of birds and their eggs (geese, ducks, swans, cranes, ptarmigans and grouses, seabirds, shorebirds, and grebes and loons). Survey information includes species and amounts of birds and their eggs taken for subsistence use in each harvest season. Data collection is done by contract with Alaska Native organizations and other regional and local partners, which hire local village residents as surveyors and survey consultants.

Regions and villages are surveyed in a 4-year cycle rotation schedule so not all regions and villages are surveyed every year. Harvest information is collected every year in selected regions and 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. The primary sampling unit is households in areas of Alaska eligible for the subsistence harvest of migratory birds. Local surveyors are hired to compile a list of all permanent households in each village, to provide information on the survey to the communities, and to assist households to complete the harvest report (hardcopy form, face-to-face interaction). Households may offer comments on their harvest, on the availability of birds, on the survey, or any other topic related to birds harvest.

Respondents to this survey report information two times per year. Seasonal data collection occurs after the end of the season of most harvest and after the end of the other harvest seasons combined (Table 1). Compared to a household visit at the end of each harvest season as in the original survey protocol (AMBCC 2003, Wentworth 2006), the revised survey reduced 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 harvests in fall and winter. The timing of seasonal data collection is based on two regional seasonal harvest patterns:

- Pacific-Aleutian: 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 in the Bristol Bay region, and Southeast Alaska).

- Arctic-Northwest-Interior: 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, and Bristol Bay except South Alaska Peninsula).

Table 1. Seasonal survey coverage and household visits.

Regions	Spring			Summer		Fall		Winter				
	2 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	•	•	•	•	•	•	•	•	•	•	•	• 1st, 3rd
						2nd						
Kodiak Archipelago	•	•	•	•	•	•	•	•	•	•	•	• 1st, 3rd
				2nd								
Aleutian-Pribilof Islands	•	•	•	•	•	•	•	•	•	•	•	• 1st, 3rd
						2nd						
South Alaska Peninsula (Bristol Bay region)	•	•	•	•	•	•	•	•	•	•	•	• 1st, 3rd
						2nd						
Bristol Bay (except South Alaska Peninsula)	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
Yukon-Kuskokwim Delta	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
Bering Strait-Norton Sound	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
Northwest Arctic	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
North Slope	•	•	•	•	•	◦	◦	◦	◦	◦	◦	◦ 1st
				2nd		3rd						
Interior Alaska	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
Upper Copper River	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								
Southeast Alaska	•	•	•	•	•	•	•	◦ 3rd	◦	◦	◦	◦ 1st
				2nd								

• Seasons surveyed.
◦ Seasons not surveyed.
1st First household visit, to invite households to participate in the survey.
2nd Second household visit, to collect spring or spring and summer harvest data.
3rd Third household visit, to collect harvest data for remaining season(s).

Tracking Sheet & Household Consent (FWS Form 3-2380). At the first household visit, the surveyor invites each selected household to participate and completes FWS Form 3-2380 documenting whether each selected household agreed to participate, did not agree, or could not be contacted. The surveyor also uses this form to keep track of and document survey work.

Harvest Report (FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, and 3-2381-4). Forms are used to record the harvest of birds and their eggs. The form has one sheet for each season (spring, summer, fall, winter). Each seasonal sheet has black and white drawings of bird species in breeding plumage. Next to each species drawing, are fields to record the number of birds and eggs harvested. Because bird species available for harvest varies in different regions of Alaska, there are four versions of the harvest report form with different sets of species. This helps to prevent erroneously recording bird species as harvested in areas where they do not usually occur.

The survey data have several uses: (1) assist the Service to develop spring–summer migratory bird harvest regulations; (2) document subsistence harvest trends and track major changes in

harvest; (3) document 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) assist in the development of management plans by State and Federal agencies. We do not use information from the survey for law enforcement purposes.

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. Annually, the Service adjusts harvest regulations as needed to provide maximum subsistence harvest opportunities while accounting for current bird population status and population goals established in species' management plans. The AMBCC uses this information to make regulation recommendations to the Service Regulations Committee (SRC). This harvest survey also provides data on the population status of species used for subsistence purposes (e.g. cackling goose). Nongovernmental organizations use survey data to monitor the status of migratory bird resources in Alaska and internationally. Additionally, over the years, the survey became a main line of communication between wildlife management agencies and the local communities and harvesters.

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 (hardcopy) is the only way for households to report their harvest. The harvest report 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. Communication with villages by phone, fax, email, and other internet services is still often difficult because of restricted access to these systems, as well as difficulties in their operation and maintenance. Older household members often do not read or write English; therefore, the use of automated technology would make them reliant on other people to assist in completing an electronic survey, potentially resulting in lower response rates and loss of accuracy in harvest reports. In addition, if survey forms are made available online, we might receive responses from a biased sample of households (despite an initially randomly selected sample) because access and use of electronic resources likely is not evenly spread in the sampling universe. This source of bias in data collection would affect survey results and complicate efforts to produce reliable harvest estimates on which to base harvest regulations. The involvement of local village residents in this survey as hired surveyors has largely facilitated communication with communities and individual households, promoting village and household participation in the survey and in the co-management of migratory birds in Alaska.

4. Describe efforts to identify duplication.

Some degree of duplication in migratory bird harvest data collection may exist for 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 State hunting permit and both State and Federal duck stamps. Purchase of a State stamp enrolls the purchaser in the HIP. For fall harvests, in areas eligible for the subsistence hunt, a hunter may be selected to be surveyed by HIP and his/her household may also be selected for the subsistence harvest survey. Both

surveys report fall harvests. However, such duplication is likely small in most Alaska rural villages because of low compliance with the stamp requirement among subsistence hunters. There has been strong resistance by subsistence hunters to duck stamps requirement and there is an ongoing, active effort by these stakeholders to remove the requirement. Also, access to stamps is sometimes difficult in rural Alaska. Sample sizes associated with HIP enrollment in most rural Alaska regions are too small to provide for accurate harvest estimates (for instance, in the North Slope region, for each year between 2000 and 2009, fewer than 20 hunters acquired a stamp). Because of very low enrolment of Alaska rural residents in the HIP, the AMBCC opted to survey fall harvest to ensure its documentation until adherence to duck stamps increases in rural villages. Also, HIP information cannot be used or modified to properly monitor the subsistence fall harvest because it does not include many species harvested in Alaska for subsistence, some of which are considered species of conservation concern.

Recommendations were made to eliminate the overlap between the HIP and the Alaska subsistence surveys: the subsistence sampling frame would remain the same (hunters in subsistence eligible areas during spring, summer, and fall seasons) while the HIP sampling frame would cover only areas not eligible for spring-summer subsistence harvest. Eligibility for the subsistence harvest can be determined by the residence address that hunters provide when they buy a duck stamp. However, modifying the HIP sampling frame in Alaska to avoid duplication in harvest information collection could interfere with efforts to improve compliance with duck stamps requirement. This recommendation was tabled while considering the current discussions regarding requirements and compliance to duck stamps in rural Alaska.

The ADFG, Alaska Native organizations, University of Alaska, local and regional government entities, and private contractors have collected information on subsistence harvest of birds and eggs. However, this information is (1) available for selected communities and years not allowing to track temporal harvest trends; (2) insufficiently detailed and thus not useful for regulations setting (surveys may refer only to larger categories of birds such as ducks, seabirds, shorebirds); and (3) reported in a geographical scale sometimes incompatible with that one used in decision making.

The ADFG Division of Subsistence has 33 years of experience conducting subsistence research in Alaska. Because of the Division's recognized expertise in this field, the Service partnered with the Division of Subsistence for the coordination, data analysis, and reporting of the AMBCC survey. The Division's staff is usually informed about other research being conducted by Federal, State, and private organizations and frequently partners in these studies (e.g., OMB 1024-0262 in Table 2). This networking sometimes allows coordination of survey efforts, although coordination is not always possible because of mismatches in sampling universe, timing of data collection, harvest period covered, confidentiality requirements, standards for data release, and imperfect communication among research bodies (Naves et al. 2008). Currently, the AMBCC survey program coordinator (Liliana Naves, ADFG Division of Subsistence) has been working to further increase compatibility among all comprehensive harvest surveys (all resources including birds) conducted by the Division of Subsistence and the AMBCC survey so that data collected in other research can be fully useful for the AMBCC.

Three projects with an active OMB approval could potentially overlap with the AMBCC survey (Table 2). Out of 252 months covered by these three projects (21 communities x 12 months), overlap with the AMBCC survey was of 12 months (less than 1 percent).

Table 2. Overlap of other projects with active OMB approval and the AMBCC survey.

Project	Villages surveyed	Harvest period covered	Harvest period covered by closest AMBCC survey
OMB 1010-0181: BOEM and University of Alaska Fairbanks (2011-2013)	Wainwright	Nov 2009-Oct 2010	Apr-Aug 2009
	Venetie*	Oct 2009 - Sep 2010	Apr-Oct 2010
	Kaktovik	May 2010-Apr 2011	Apr-Aug 2009
OMB 1024-0262: NPS and ADFG Division of subsistence (2012-2015)	Chistochina	Jan-Dec 2009	Apr-Oct 2007
	Mentasta Lake	Jan-Dec 2010	Apr-Oct 2007
	Mentasta Pass	Jan-Dec 2010	Apr-Oct 2007
	Slana	Jan-Dec 2010	not in AMBCC sampling universe[a]
	Copper Center	Jan-Dec 2010	Apr-Oct 2007
	Wiseman	Jan-Dec 2011	Apr-Oct 2010
	Bettles	Jan-Dec 2011	Apr-Oct 2006
	Evansville	Jan-Dec 2011	Apr-Oct 2006
	Anaktuvuk Pass	Jan-Dec 2011	Apr-Aug 2007
	McCarthy	Jan-Dec 2012	not in AMBCC sampling universe[a]
	Chitina	Jan-Dec 2012	Apr-Oct 2004
	Gakona	Jan-Dec 2012	Apr-Oct 2007
	Kenny Lake	Jan-Dec 2012	not in AMBCC sampling universe[a]
	Yakutat	Jan-Dec 2013	never surveyed by AMBCC
OMB 101-0184: BOEM and Idaho State University (2008-2009)	Nelson Lagoon	Jan-Dec 2009	never surveyed by AMBCC
	Port Heiden	Jan-Dec 2009	Apr-Oct 2005
	Akutan*	Jan-Dec 2009	Apr 2008-Mar 2009
	False Pass*	Jan-Dec 2009	Apr 2008-Mar 2009

* Partial overlap of harvest period covered by the AMBCC survey and other research projects.

a. Areas not eligible for the migratory bird subsistence harvest are not included in the sampling universe.

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, corporations, and associations by providing temporary employment in work related to data collection (field coordinators, surveyors, survey consultants). The partnerships for data collection in the AMBCC subsistence survey play an important role in capacity building in regional and local organizations as they work in close collaboration with State and Federal agencies with extensive experience in subsistence harvest data collection. 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. Subsistence harvest is a core value of Alaska

rural communities and their direct involvement in harvest data collection and harvest management is very important for the survival of their culture and socioeconomic well-being.

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

The Amendment to the Migratory Bird Treaty Act did not intend 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 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 overharvest. Hunting regulations that are unnecessarily restrictive would curtail subsistence harvest opportunities and impose hardship on communities that rely on subsistence harvest for their nutritional and cultural wellbeing.

On the other hand, population sizes are vaguely known for some seaduck species, non-game species, and even some common species of management concern. Therefore, it is crucial to monitor the subsistence harvest to ensure that bird populations are not threatened by overharvest. For species of conservation concern, annual harvest monitoring allows us to implement necessary educational and regulatory efforts to adequately protect and restore bird populations.

According to the adopted survey methods, the subsistence harvest survey should be conducted yearly with collection of harvest reports two times per year. Regions and villages rotate so that about half of the regions are surveyed each year and in the surveyed regions only half of the villages should be surveyed. Only a few villages should be surveyed in successive years. However, funding limitations and other practical difficulties sometimes precludes the implementation of the full rotation schedule. If we conducted the survey less frequently, it would be impossible to adequately monitor the effect of the 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. If applicable, 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.

On October 25, 2012 we published the 60-day notice requesting public comments on the renewal of this information collection (77 FR 65201). The comment period ended on December 24, 2012. We received one comment in response to this notice. The commenter stated that migratory birds should not be hunted, that people extensively lie in harvest reports, and, therefore, this survey is a waste of taxpayer dollars. Harvest and sharing of wild fish, caribou, moose, marine mammals, and birds traditionally have been and still are the core of the diet, social organization, and spiritual life of Alaska Native cultures. The large majority of these villages are in remote, non-roaded areas and subsistence harvests play an important role in food security. Subsistence harvest surveys allow Alaska Native people to actively engage as stakeholders in the management and conservation of the wildlife resources they rely upon. We believe the vast majority of the information provided in this survey is honest and truthful. Harvest survey data are used to assess and adjust hunting regulations that help protect the birds and sustainable hunting opportunities. Taxpayer dollars invested in harvest surveys help protect birds that people rely upon for food and for the enjoyment by present and future generations of both hunters and non-hunters. We did not make any changes to the information collection requirements.

Public Outreach

In September 2012, we conducted outreach consultation with seven people informed on subsistence harvest surveys in general and especially on this survey. Names and affiliations are listed below. These persons are also familiar with uses of subsistence harvest information and some of them are subsistence hunters. Two persons are Service employees, whose input was sought because of their deep understanding of subsistence issues.

Table 3. Outreach participants.

Patty Brown-Schwalenberg Chugach Regional Resources Commission, Executive Director 6200 Lake Otis Parkway, Suite 201 Anchorage, AK 99507 phone (907) 562-6647 alutiiqpride1@crrcalaska.org	**Taqulik Hepa** North Slope Borough, Wildlife Management Director P.O. Box 69, Barrow, Alaska 99723 phone (907) 852-0350 taqulik.hepa@north-slope.org
Dan Rosenberg ADFG Division of Wildlife Conservation, Waterfowl Coordinator 333 Raspberry Rd, Anchorage, AK 99518 phone (907) 267-2453 dan.rosenberg@alaska.gov	**Sara Evans** ADFG Division of Subsistence, Fish and Wildlife Technician 546 Kenny Wren Rd, Dillingham, AK 99576 phone (907) 842-1726 sarah.evans@alaska.gov
Jim Fall ADFG Division of Subsistence, Subsistence Program Manager 333 Raspberry Rd, Anchorage, AK 99518 phone (907) 267-2359 jim.fall@alaska.gov	**Tamara Zeller** USFWS Migratory Bird Management, Outreach Biologist 1011 E. Tudor Rd, ms 201, Anchorage, Alaska 99503 phone (907) 786-3517 tamara_zeller@fws.gov
Vince Mathews USFWS, Subsistence Coordinator for Yukon Flats, Kanuti, and Arctic National Wildlife Refuges Yukon Flats NWR, 101 12th Avenue, Room 264, Fairbanks, AK 99701 phone (907) 455-1823 vince_mathews@fws.gov	

Commenters agreed that:

- This survey is necessary and has practical utility in (1) providing data needed for the management of migratory birds; (2) documenting subsistence harvests of birds in Alaska; (3) fulfilling requirements of the Migratory Bird Treaty Amendment; and (4) facilitating participation of stakeholders in the co-management process.
- It takes on average 5 minutes to determine whether or not a household agrees to participate in the survey (FWS Form 3-2380). One person emphasized the need to clearly explain the purposes and benefits of the survey to enlist household participation.
- It takes an average of 5 minutes to complete a seasonal harvest report (FWS Form 3-2381). They stated that the time required at each household varies depending on whether the household harvested birds and on whether the household voluntary offered comments on birds harvest and ecology.

We asked for suggestions to improve the quality, utility, and clarity of the data collected. Some comments supported continuation of work already included in the survey protocol: (a) continue conducting the yearly survey to obtain meaningful time series and further develop communication and trust with communities; (b) ensure consistency of survey materials and efforts to which communities and survey staff are already familiar with; (c) continue work with local communities to refine survey methods when needed. Some comments referred to improvements made in the last survey review (2008-2009) and stated that the current methods work well. Suggestions offered to improve the current survey:

- Provide additional information to survey respondents so they can accurately identify the species harvested. *Response:* Species identification issues were considered in the last review of the regional harvest report form (2008-2009, previous OMB approval process).

Recent efforts to assist in species identification included: a) production and use by field staff of lists of local and Native bird names for languages, dialects, and subdialects in the regions surveyed (Naves 2012); b) production, use, and large distribution of the "Bering Strait Loon Identification Guide" in recent surveys in the St. Lawrence-Diomede subregion (Appendix 8); c) production of loon identification materials for survey field staff training. Recent surveys in the St. Lawrence-Diomede subregion included public meetings on the biology, identification, and conservation concerns regarding yellow-billed loons and bird identification books (all species) were offered to representative entities in the villages. The survey coordination and the AMBCC harvest Survey Committee continuously welcome specific input to identify and address species identification issues.

- Survey should focus on the most commonly harvested species. *Response:* This comment is likely related to recent discussions on whether the AMBCC survey should focus on species of conservation and management concern and likely reflects support for the current survey approach, which addresses the species most commonly harvested and proposes that concerns related to species of conservation concern (which in general fit in the "rarely harvested" category) should be addressed in a case by case approach because of difficulties in documenting harvest of rarely taken species (Naves, 2012).

- Share graphically how the data collected fits in the Pacific flyway management as a whole. *Response:* This comment refers to dissemination of survey results. The program is up to date with its reporting requirements as yearly survey reports have been produced and largely distributed since 2010. In 2011, a four-page graphic summary of 2004-2009 survey results were produced for the three best covered regions (Yukon Delta, Bristol Bay, Interior Alaska) and were largely distributed to households, local and regional organizations, and research and management agencies. In 2011, the AMBCC adopted a resolution to include a presentation on survey results in its yearly fall meetings. The program coordinator has conducted a series of presentations on survey results and their insertion in the whole Pacific Flyway and management system. Such efforts will continue and hopefully expand as new analyses reveal other aspects of the data collected by the AMBCC survey.

The following suggestions were made on ways to minimize burden on respondents:

- Limit data collection to one household visit per year. *Response:* The number of household visits in a survey year was reduced from 4 to 3 during the first survey review in 2008-2009. During that review, an alternative proposal for a single household visit per year encountered opposition by a few members of the AMBCC Harvest Survey Committee because of concerns related to potential increase in recall bias. Further reduction of the number of household visits in a survey year remains as an option to reduce survey burden and costs and to simplify logistics. Costs and benefits of multiple household visits could be revisited at the next opportunity in an AMBCC Harvest Survey Meeting.

- Pay the households a small amount or provide drawn prizes. *Response:* Compensation of participating households better qualifies as a strategy to increase survey participation as opposed to minimize burden. Opinions in favor and against compensation for surveys exist within the AMBCC Harvest Survey Committee, but a consensus on this topic has not been met. Also, the AMBCC survey program has been severely underfunded, which has precluded further pursuit of this option.

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

We do not provide 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 do not provide any assurance of confidentiality. We inform respondents that: (1) no names or other personal information are written on harvest report forms, archived, or kept in databases; (2) survey information at the household level is considered sensitive; and (3) that survey information at household level is not reported or used for law enforcement purposes. No personal information such as SSN is collected. 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 or other survey material except the household list. 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.

Based on the current rotation schedule of regions and villages (Naves 2012), the overall yearly sample size is estimated as 2,300 households. We estimate respondents will provide 9,660 responses totaling 805 annual burden hours. The "Bureau of Labor Statistics May 2011 State Occupational Employment and Wage Estimates" lists the mean hourly wage for persons in "farming, fishing, and forestry occupations" in Alaska as $22.33 (http://www.bls.gov/oes/current/oes_ak.htm#45-0000). We multiplied the hourly wage by 1.4 to account for benefits in accordance with Bureau of Labor Statistics news release USDL 12-2404, December 11, 2012, resulting in an hourly cost factor of $31.26. We estimate the total dollar value of the annual burden hours is $25,165.

Table 4. Consolidated burden information.

Requirement	Annual number of respondents	Total annual responses	Completion time per response	Total annual burden hours	Total dollar value of annual burden hours*
FWS Form 3-2380	2,760	2,760	5 minutes	230	$ 7,190
FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, 3-2381-4	2,300	6,900	5 minutes	575	$17,975
Total	**5,060**	**9,660**		**805**	**$25,165**

*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.

This survey is conducted under contracts with a number of Alaska Native organizations and the ADFG. In 2010-2012, the average yearly cost for the Federal Government to administer this information collection was $347,929. Field operations include payment of local surveyors and survey consultants, travel, salaries of field coordinators, supplies (printing, copies, telephone, fax), and indirect costs. Survey coordination is conducted by the ADFG Division of Subsistence and includes coordination with partners (the Service, Alaska Native organizations, and other State, Federal, and private organizations), management of survey materials, oversight of data collection, reporting of survey results. Data management and analysis are also conducted by the ADFG Division of Subsistence, including its Information Management Unit, and covers salaries (data entry, cleaning, archiving, analysis, and database maintenance), software licenses, hardware replacement.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

We are reporting 9,660 responses totaling 805 annual burden hours, which is an adjustment decrease of 69 responses and 6 burden hours from our previous submission. This small difference exists because the current burden hour is based on a revised and slightly higher response rate (80 percent) as compared to the previous submission (77 percent). A higher response rate translates to a smaller number of households that need to be contacted to achieve the sampling goal.

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

Harvest estimates from the subsistence survey are available to Federal and State wildlife management and conservation agencies, the Pacific Flyway Council, Alaska Native organizations, the villages that participate in the survey, and the public at large. Yearly final reports are distributed to partners and available at the AMBCC and ADFG websites for download. Final reports are available for the period 2004-2010 in accordance with the timetable for data release (Table 5).

Table 5. Yearly timetable for implementation of the migratory bird subsistence harvest survey.

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Fieldwork preparation												
Develop partnerships and contracts for data collection		x	x	x	x							
Prepare survey materials, train field coordinators				x	x							
Conduct village outreach						x	x					
Contract and train local surveyors						x	x					
Distribute village survey packages						x	x					
Data collection (year *t*)												
1st Household visit (household information and consent)							x	x				
2nd Household visit (harvest report)	x [a]										x [b, c]	

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
3rd Household visit (harvest report)	x [c]		x [b]				x [a]	x [a]				
Regional field coordinators send completed forms to statewide survey coordinator		x [c]	x [c]	x [b]	x [b]				x [a]	x [a]		
Data analysis, review, and release[d]												
Data management and analysis (year *t*-1)						x	x	x	x	x	x	x
Release draft report (year *t*-1) for review and present survey results (AMBCC fall meeting)	x											
Data review by AMBCC Regional Councils and partners (year *t*-1)	x	x	x	x	x	x	x					
Adopt annual harvest estimates (year *t*-2) (AMBCC Spring meeting)								x				
Release yearly final report (year *t*-2)									x			
Pacific Flyway Council meetings							x				x	
FWS Ecological Services: Biological Opinion for Subsistence Hunting Regulations (BO)	x											x
FWS Ecological Services: Candidate Notice of Review for endangered species (CNoR)								x				

a: Pacific-Aleutian Seasonal Pattern: Kodiak, Aleutian-Pribilof Islands, Gulf of Alaska-Cook Inlet, South Alaska Peninsula (Bristol Bay region), and Southeast Alaska.
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.
d: The release of information is 2 years after data collection because of duration and timing required for data collection, analysis, and review by regional councils.
Year *t*: current calendar year.

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.

There are no exceptions to the certification statement.

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