

**1 Supporting 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: 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 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 collecting geographic and temporal data on the harvest of migratory birds. The Treaty Protocol Amendment (1995) (Amendment) provided for the customary and traditional subsistence use of migratory birds and their eggs 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 (ADF&G), and Alaska Native organizations would cooperatively collect data to produce harvest estimates for subsistence eligible areas. 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 ADF&G, and regional Alaska Native entities.

Between 1985–2002, we monitored subsistence harvest through annual household surveys in the Yukon-Kuskokwim Delta and Bristol Bay regions in Alaska, 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, 2014, 2015a, 2015b, Naves and Braem 2014). Harvest monitoring enables us to track harvest trends 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. But, subsistence and sport harvest in Alaska accounts for only 10% of harvests in the whole Pacific Flyway (Naves, unpublished results). Harvest estimates 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 AMBCC-Harvest Assessment Program (HAP) was collaboratively revised by the Service, the ADF&G, and the AMBCC Harvest Survey Committee (Naves et al. 2008). Data collection by the revised program has been carried out since 2010. No revisions have been made to the program since the last approval by OMB. Since July 2014, a review of the AMBCC-HAP is underway. The main objective of this review is to reduce survey costs given insufficient funds and to update survey program objectives. The review has been led by a team

of researchers from Colorado State University (CSU) under contract with the USFWS. The CSU Team works in close collaboration with a Technical Working Group composed of representatives of State, Federal, and Alaska Native stakeholders as well as other experts in harvest assessment. Alternative survey methods will be discussed by the involved parties in 2016. OMB approval will be requested if needed to test and/or implement potential modifications to survey methods. Until the survey review is completed, we are seeking to renew the current survey for continued implementation of the currently approved survey.

This survey relies on collaboration among the Service, the ADF&G, 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, loons and grebes). Survey data includes species and amounts of birds and their eggs taken for subsistence use in each harvest season (spring, summer, fall, winter). 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 rotational cycle; not all regions and villages are surveyed every year. Harvest data are collected every year in selected regions based on monitoring priorities. 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 household is the primary sampling unit. 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, in-person interview). 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 data 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 recall bias. Recall bias tends 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

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.

Federal and State agencies use the data collected to develop harvest regulations. 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 United States is not viable in rural Alaska due to the remoteness of villages, marked differences in lifestyles, and socio-economic conditions. Communication with villages by phone, fax, email, and other internet services is still often difficult because of restricted access to these systems and difficulties in their operation and maintenance. Older household members often do not speak, read, or write English; thus, 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. Also, 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 distributed in the sampling universe. This source of bias 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 households, promoting their 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 the duck stamp requirement and there are ongoing efforts by these stakeholders to remove the requirement. In 2015, exemption to the Federal duck stamp was granted to Alaska rural residents. While the requirement for the State stamp persists, efforts have now been aimed at the exemption of the State stamp. 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 2000–2009, fewer than 20 hunters acquired a stamp). Because of low enrollment of Alaska rural residents in the HIP, the AMBCC opted to survey fall harvest to ensure its documentation. Also, HIP information cannot be used or modified to monitor some subsistence harvests 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) 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 data 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 ADF&G, 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 available for selected communities and years not allowing us to track temporal harvest trends.

The ADF&G Division of Subsistence has decades 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). The AMBCC-HAP coordinator (Liliana Naves, ADF&G Division of Subsistence) has worked to increase compatibility among all comprehensive harvest surveys (all resources, including birds) conducted by the Division of Subsistence and the AMBCC-HAP so that data collected in other research can be useful for the AMBCC. Whenever possible, the AMBCC survey is combined with other surveys to minimize survey burden and optimize allocation of staff and other resources (e.g., AMBCC survey and land mammal surveys were conducted together in Kotzebue in 2012) (Naves and Braem 2014). Currently, we are considering combining the AMBCC survey with salmon surveys conducted in the Yukon-Kuskokwim Delta region.

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 to ensure that households spend minimal time completing the survey. This survey can have positive impacts on Alaska Native organizations (e.g., tribal councils, corporations, local individuals) by providing temporary employment in work related to data collection (field coordinators, surveyors, survey consultants). The partnerships for data collection in the AMBCC 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 harvest data collection. Subsistence harvest is a core value of Alaska. 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 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. Thus, 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 harvest assessment 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 poorly known for some seaduck species, non-game species, and even some common species of management concern. Thus, 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.

The subsistence harvest survey is 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 half of the villages are surveyed. Few villages are surveyed in successive years. However, funding limitations and other practical difficulties sometimes preclude 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 varies largely among years and localities because of ecological and socio-economic factors. 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 December 3, 2015, we published a 60-day notice (80 FR 75685) in the Federal Register requesting public comments on the renewal of this information collection. The comment period ended on February 1, 2016. We did not receive any comments.

Public Outreach

We conducted outreach consultation with seven people informed on subsistence harvest surveys in general and especially on this survey. These persons are familiar with uses of subsistence harvest information and one of them is a resident of a subsistence community. All persons contacted responded. Outreach comments are attached as a supplementary document.

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We asked the following questions:

1. Is the information collected by the AMBCC subsistence harvest survey necessary and does the information have practical utility?

All commenters supported the survey as necessary and stated that the data generated has practical utility.

2. Does it still take the surveyor on average of 5 minutes per household to determine whether or not that household agrees to participate in the survey?

3. Does it still take the household member on average of 5 minutes to fill out a seasonal sheet of the AMBCC subsistence harvest survey?

Responses to these questions supported that, on average, it takes about 5 minutes to determine whether households agree to participate in the survey and about 5 minutes to complete a seasonal survey sheet.

4. Do you have suggestions to improve the quality, utility, and clarity of the information collected?

5. Do you have suggestions on ways to minimize the burden of the collection of information on respondents?

Answers to questions 4 and 5 mostly referred to the ongoing survey review. Different alternatives are being considered to further streamline survey methods and implementation. Some alternatives being considered would reduce survey burden: (1) Conduct two visits to selected households per survey year as opposed to the three seasonal visits as in current

survey methods. (2) Reduce number of households and villages surveyed, which also has the objective of reducing survey costs.

One commenter suggested that to simplify survey implementation, consider the option of using simple random sampling as opposed to harvester/other stratification.

In response to question 4, one commenter recommended that surveyors be trained to use fewer checklists.

In response to questions 4 and 5, one commenter stated that the color bird ID cards should always be employed in the survey and a copy of the card should always be given to the respondent. This commenter also suggested that we remove as much "red tape" as possible. Train local researchers to be efficient. Subsistence users are always more apt to participate when the process is non-confusing and hassle free.

Response: Surveyors are trained to always provide the color bird identification guide to all contacted households and to use it together with the black-and-white survey form when completing surveys. Efforts are made to combine the birds survey with other ongoing harvest surveys whenever possible. For instance, in 2012, the AMBCC harvest survey was combined with the land mammal survey in Kotzebue. Currently, we are considering combining the AMBCC survey with salmon surveys conducted in the Yukon-Kuskokwim Delta region.

We did not make any changes to our requirements as a result of the above comments.

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 instructed to not write names on harvest report forms or other survey material except the household list. Original "Household List and Selection Forms" are not archived.

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.

We estimate that we will receive 9,453 responses totaling 788 annual burden hours. The “Bureau of Labor Statistics May 2015 State Occupational Employment and Wage Estimates Alaska” lists the mean hourly wage for persons in “farming, fishing, and forestry occupations” in Alaska as \$19.85 (http://www.bls.gov/oes/current/oes_ak.htm#45-0000). We multiplied the hourly wage by 1.5 to account for benefits in accordance with Bureau of Labor Statistics news release USDL 16-0463, resulting in an hourly cost factor of \$29.78 (rounded). We estimate the total dollar value of the annual burden hours is \$23.467 (rounded).

Table 3. Consolidated burden information.

Requirement	Total annual responses	Completion time per response	Total annual burden hours	Total dollar value of annual burden hours*
FWS Form 3-2380	2,553	5 minutes	213	
FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, 3-2381-4	6,900	5 minutes	575	
Total	9,453		788	\$23.467

*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 ADF&G. From 2007–2015, the average yearly cost for the Federal Government to administer this information collection was \$330,000. 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 ADF&G 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 ADF&G Division of Subsistence, including its Information Management Unit, and covers salaries (data entry, archiving, and 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 9,453 responses totaling 788 annual burden hours, which is an adjustment decrease of 207 responses and 17 burden hours from our previous submission. This small adjustment is because the current burden hour is based on a revised, updated, and slightly higher response rate (2009–2013 response rate 89%; Naves 2015a:19–21) as compared to the previous submission (80%). 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 management and conservation agencies, the Pacific Flyway Council, Alaska Native organizations, the villages that participate in the survey, and the public at large. Hard copies of annual reports are distributed to AMBCC partners. Electronic files of annual reports, outreach materials, and other information regarding the AMBCC-HAP are available at the AMBCC and ADF&G websites for download (links below). Final reports are available for the period 2004–2014. According to the survey reporting timetable (Naves 2012), there are no pending or delayed due reports. To increase access to the harvest data generated by the survey and to facilitate its application, the 2004–2014 data book was produced to compile bird harvest data. Also, efforts are ongoing to implement an online tool to download harvest estimates on demand by selecting species and regions. This online application will be hosted at the ADF&G website and linked in the AMBCC website.

<http://www.fws.gov/alaska/ambcc/harvest.htm>

Annual Harvest Reports

2014 report <http://www.adfg.alaska.gov/techpap/TP415.pdf>

2013 report <http://www.adfg.alaska.gov/techpap/TP409.pdf>

2012 report <http://www.adfg.alaska.gov/techpap/TP397.pdf>

2011 report <http://www.adfg.alaska.gov/techpap/TP395.pdf>

2010 report <http://www.adfg.alaska.gov/techpap/TP%20376.pdf>

2009 report <http://www.adfg.alaska.gov/techpap/TP%20364.pdf>

2008 report <http://www.adfg.alaska.gov/techpap/TP353.pdf>

2004-2007 report <http://www.adfg.alaska.gov/techpap/TP349.pdf>

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.

References Cited

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