

1SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

Alaska Migratory Bird Subsistence Harvest Household Surveys OMB Control Number 1018-0124

Terms of Clearance: This is a request to revise OMB Control Number 1018-0124 in conjunction with a rulemaking (RIN 1018-BF08) issued to propose changes to the migratory bird subsistence harvest regulations in Alaska. We are requesting the Kodiak roaded area harvest reporting requirement contained in this rulemaking be approved under this Control Number. We are submitting a concurrent, separate OMB approval request for the new information collections for the associated Kodiak roaded area permit and Tribal invitation letter requirements.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-712) and the Fish and Wildlife Act of 1956 (16 U.S.C. 742d) designate the Department of the Interior as the 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 MBTA Protocol Amendment (1995) 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 (USFWS), 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.

In 2000, the USFWS created the Alaska Migratory Bird Co-Management Council (AMBCC) to implement provisions of the Amendment. The AMBCC is composed of representatives from the USFWS, the ADF&G, and regional Alaska Native partners. The AMBCC provides recommendations for harvest regulations and other topics related to harvest and conservation of migratory birds, and conduct harvest monitoring.

In 1985–2002, the USFWS conducted annual bird and egg harvest surveys in the Yukon-Kuskokwim Delta and Bristol Bay regions in Alaska in the context of the Goose Management Plan (Wentworth 2007a, 2007b). Starting in 2004, bird and egg harvest surveys were expanded to all subsistence eligible areas of Alaska in the context of the AMBCC harvest surveys (Naves and Keating 2019, Naves and Keating 2020).

Harvest monitoring enables the USFWS to track harvest levels and document the importance of migratory birds as food and cultural resources for subsistence communities in Alaska. Bird harvests in areas of Alaska eligible for the subsistence hunt accounts for ~86% of the statewide harvest. Subsistence and sport harvest in Alaska accounts for ~6% of harvests in the whole Pacific Flyway (LC Naves, ADF&G Division of Subsistence personal communication). Harvest estimates inform the regulation setting process and effective management and conservation of

migratory birds in the Pacific Flyway as a whole.

We developed a proposed rule (RIN 1018-BF08, [86 FR 11707](#)) to update the regulations for the spring-summer subsistence harvest of migratory birds in Alaska. We developed these regulations under a co-management process involving the Service, the Alaska Department of Fish and Game, and Alaska Native representatives. The proposed changes would update the regulations to incorporate revisions requested by Alaska Native partners. A change was requested by partners representing the Kodiak Archipelago region to allow spring-summer harvest of migratory birds in the Kodiak roaded area. To implement this change, we developed a permit and harvest reporting system in collaboration with the AMBCC local partner, the Sun'ag Tribe of Kodiak.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

The harvest surveys collect information on the subsistence harvest in Alaska of ~60 species categories of birds and their eggs (geese, ducks, swans, crane, ptarmigan and grouse, seabirds, shorebirds, loons and grebes). Survey data includes species category and amounts of birds and eggs taken for subsistence use in each harvest season (spring, summer, fall, winter). The surveys rely on collaboration among the USFWS, the ADF&G, and many Alaska Native organizations. Contracts and cooperative agreements are in place to facilitate the collection of data with Alaska Native organizations and other regional and local partners. Surveyors contact local residents. The ADF&G Division of Subsistence coordinate the surveys on behalf of the AMBCC via a cooperative agreement with the USFWS.

The USFWS uses the survey data to:

- (1) Inform harvest regulations for migratory birds and their eggs so they are consistent with the long-term sustainability of bird populations;
- (2) Document subsistence harvest trends and track changes in harvest;
- (3) Document the importance of birds as food and cultural resources for subsistence communities in Alaska;
- (4) Protected sustainable harvest opportunities; and
- (5) Assist in the development of management plans by State and Federal agencies.

Federal and State agencies use the data collected to develop harvest regulations and protect sustainable harvest opportunities. The USFWS adjusts harvest regulations as needed to provide maximum and sustainable 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 Nongovernmental organizations use survey data to monitor the status of uses of migratory bird resources in Alaska and internationally. The survey also became a main line of communication between wildlife management agencies and the local communities and harvesters.

Participation in the surveys is voluntary for communities and households. In selected communities that agree to participate, surveyors compile a list of all permanent households or addresses, provide information about the survey, and assist households to complete the harvest report form (hardcopy) in in-person interviews. Households may offer comments on their harvest, on the availability of birds, on the survey, or any other topic related to birds harvest.

The survey uses the following forms:

Tracking Sheet & Household Consent (FWS Form 3-2380)

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 survey work.

Harvest Report (FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, 3-2381-4, and 3-2381-5)

The forms have up to four sheets, one for each surveyed season. The Western and Interior forms (3-2381-1 and 3-2381-3; ~394 households surveyed per year) have 3 sheets (spring, summer, and fall). The Bristol Bay form has 4 sheets (spring, summer, fall, winter; ~110 households surveyed per year). The North Slope form has two sheets (spring and summer; ~150 households surveyed per year). The Cordova form has only 1 sheet (spring; ~27 households surveyed per year). The weighted average for the whole survey is 2.96 seasonal sheets (rounded as 3 for calculation of burden estimates). Each seasonal sheet has drawings of bird species, next to which 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 five 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.

PROPOSED CHANGES TO INFORMATION COLLECTION:

Kodiak Roded Area Harvest Reports (FWS Forms 3-2381-6 (new) and 3-2381-7 (new))

Starting in 2021, a mail survey akin to that conducted for the Cordova harvest will be implemented for the Kodiak roded area harvest as required by updated federal regulations for the Kodiak Archipelago region. To participate in the Kodiak roded area harvest, harvesters are required to obtain a permit and to complete a harvest report form, even if they did not harvest. Staff from the Alaska Department of Fish and Game (ADF&G) Division of Subsistence worked in close collaboration with the Sun'aq Tribe of Kodiak to develop the permit and harvest reporting system. The Sun'aq Tribe requested in-season harvest reporting. Permits will be issued by the Sun'aq Tribe.

The Kodiak Roded Area In-Season Harvest Report (FWS Form 3-2381-6) will be provided to permit holders at the time the permit is issued. Harvesters are required to record their harvest using this form along the season. At the end of the season (early Sep), all permit holders are required to submit the completed Kodiak Roded Area In-Season Harvest Report (FWS Form 3-2381-7) indicating whether they harvested birds and eggs, and if so, the kinds and amounts of birds and eggs harvested. Permit holders submit the completed form by mail to the ADF&G for data analysis (the form includes the return address and is postage-paid). To ensure a more complete harvest reporting, the ADF&G will mail a post-season harvest survey to permit holders who did not submit a completed in-season harvest log. The post-season mail survey includes two reminders. Reported harvests will be extrapolated to represent all permit holders based on statistical methods. Forms 3-2381-6 and 3-2381-7 are only completed twice per year (spring and summer seasons).

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. In rural Alaska, the remoteness of villages and socio-economic and cultural context result in limited access to online resources. 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 maintenance.

Also, electronic data collection may result in biased data because access to and use of electronic resources likely is not evenly distributed in the sampling universe. Older household members are often unfamiliar with modern technologies. 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 bias in data collection. Instead, the involvement of local residents contracted as 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. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no other regular survey that documents spring-summer harvest of migratory birds in the Kodiak Archipelago and the Gulf of Alaska-Cook Inlet regions where the requirements for the Kodiak roaded area and Cordova harvest permit and harvest monitoring apply. The annual harvest survey of the Alaska Migratory Bird Co-Management Council generates an index to the Alaska-wide harvest based on sampling in five regions (Yukon-Kuskokwim Delta, Bristol Bay, Bering Strait-Norton Sound, North Slope, and Interior Alaska). These five regions together account for about 90% of the bird harvest in areas of Alaska eligible to participate in the spring-summer harvest of migratory birds. The Kodiak Archipelago and the Chugach-Cook Inlet regions are not included in the AMBCC harvest survey.

In areas eligible for the subsistence harvest (hereafter “subsistence areas”), some degree of duplication in data collection for migratory bird harvest 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 overlap does not include the spring-summer subsistence harvest season. Among other requirements, migratory bird hunters are required to acquire a state hunting license and waterfowl stamp. The state stamp enrolls hunters in the HIP. Samples for the HIP and the AMBCC surveys are independently drawn. However, such duplication is small in most Alaska rural areas because of low compliance by subsistence hunters with the state stamp requirement. In addition, access to the state stamp is sometimes difficult in rural Alaska. Alaska Native harvesters have opposed the stamp requirement, including efforts to remove the requirement.

Previous efforts considered alternatives to eliminate the overlap between the HIP and the AMBCC survey in fall data collection. However, the nature of this overlap includes a complex history of management of migratory birds in Alaska, issues of resentment and trust among stakeholders, and adequacy of and compliance with harvest regulations. Several indirect lines of evidence suggest that HIP largely underestimates fall harvests in subsistence areas:

- (1) On average, only 14% of HIP enrolments are by residents of subsistence areas
- (2) Areas of highest harvest are under-represented in HIP enrollments by residents of subsistence areas. About 47% of HIP enrolments in subsistence areas are in areas that together account for less than 10% of the total harvest.

- (3) Nevertheless, fall harvests in subsistence areas only as measured by the AMBCC survey were higher than statewide HIP estimates in 9 of 14 years in 2004–2017.

Continuation of data collection in a manner that fully documents subsistence harvests is key to inform decisions while AMBCC partners continue to work to solve harvest management issues.

The ADF&G, Alaska Native organizations, academia, and other entities also have collected information on subsistence harvest of birds and eggs. However, this information is available for selected communities and years not allowing us to consistently track temporal harvest trends. The ADF&G Division of Subsistence (who coordinates the survey on behalf of the AMBCC) has a broad network in the harvest research domain in Alaska, which sometimes allows coordination of survey efforts. However, such 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 entities (Naves et al. 2008). Whenever possible, we combine the AMBCC survey with other surveys to minimize survey burden and increase efficiency (e.g., we conducted the AMBCC and land mammal surveys in tandem in Kotzebue in 2012) (Naves and Braem 2014). In addition, dedicated efforts have increased compatibility between comprehensive harvest surveys (all resources, including birds) conducted by the Division of Subsistence and the AMBCC so that data collected are useful for a broader diversity of applications.

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

Households are the basic sampling unit. This information collection does not affect small entities. We designed the survey methods to ensure that it is simple, easy, and fast for respondents to complete. This survey has 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). Researchers with expertise in harvest data collection worked in close collaboration with Alaska Native partners to develop survey methods including local expertise, liaison with communities, and local and traditional knowledge. This survey also promotes participation of local communities in the co-management process established by law to support 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.

The MBTA Amendment did not intend to cause significant increases in the take of migratory bird species relative to their continental population sizes. Collecting subsistence harvest information is essential to detect significant increases in harvest and to fulfill the USFWS obligation under the MBTA, which is an international law.

Failure to collect harvest information would greatly weaken the USFWS' ability to develop regulations allowing sustainable subsistence hunting of migratory birds. The long-term sustainability of migratory bird populations relies on harvests being commensurate with bird population size. Lack of accurate harvest data 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. In addition, data on

population parameters are insufficient for some bird species of conservation concern and even some common species of management concern. In these cases, annual harvest monitoring allows the USFWS to prioritize educational and research efforts to ensure adequate protection of bird populations.

The survey is conducted only in the 5 regions that contribute the most to the total harvest. Within surveyed regions, we do not survey all communities every year. Due to limited funding, we reduced the total sampling effort in the most recent survey review. We need the current sampling effort to properly quantify harvest amounts and their variation across time. Subsistence harvest varies largely among years and localities because of ecological and socio-economic factors. Conducting the survey every year is essential to ensure geographic and temporal coverage that will allow assessment of regional patterns of harvest and harvest variability.

Cordova and Kodiak roaded area harvest reporting: if we do not collect this information, we are unable to implement approved regulations intended to provide harvest opportunities and to ensure sustainability of populations of migratory birds. Spring-summer harvest in the Kodiak roaded area was allowed for three years as experimental. After the initial experimental period, the permit and harvest monitoring system will be evaluated.

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 the USFWS to collect this information in a manner inconsistent with OMB guidelines.

8. If applicable, provide a copy and identify 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 and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on

cost and hour burden.

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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

We have prepared proposed regulations (RIN 1018-BF08, [86 FR 11707](#)) to solicit the necessary information to implement the proposed changes to the harvest regulations for the Kodiak roaded area including the permit and harvest reporting requirements. A copy of the proposed rule is attached. The proposed rule solicits public comment for a period of 30 days on all aspects of the proposed change, including the information collection requirements (harvest reporting), ending on March 29, 2021. We determined a 30-day comment period to be more prudent and beneficial to the affective Alaska Native communities as it will allow the Service to publish the final rule by April 1, 2021.

In addition to the proposed rule soliciting comments on the new information collection requirements, the USFWS works cooperatively with Alaska Native and State of Alaska AMBCC partners when developing recommendations for harvest regulations and other topics related to harvest and conservation of migratory birds, including harvest monitoring. The AMBCC meetings are also open to public participation. AMBCC meetings are held twice a year, in spring and fall. The AMBCC regional bird councils meet in advance of the bi-annual AMBCC meetings to gather input at the local and regional levels.

- The AMBCC spring meeting is held prior to the Flyway Council meetings to review and vote on harvest regulation proposals that were submitted to the AMBCC by its regional bird councils, interested parties, or the public. The AMBCC accepts public comment on all regulatory and non-regulatory matters prior to any vote. The AMBCC package is provided to the four flyway councils to maintain communications and cooperation between the flyways. Recommendations from the AMBCC are ultimately sent to the Service Regulations Committee for their action during the meeting to act on late season proposals.
- The AMBCC fall meeting is held for the primary purpose of sharing information among all AMBCC partners, other interested parties, and the public to develop regulatory and other recommendations for migratory birds.

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

This survey does 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.

This survey does provide any assurance of confidentiality; however, collection and archival of

data ensures anonymity. Respondents are informed that:

- (1) No names or other personal information are written on harvest report forms, archived, or kept in databases;
- (2) Harvest data at the household level is considered sensitive; and
- (3) Survey information at household level is not reported or used for law enforcement purposes.

No personal information such as SSN is collected. Household names are used only in the “Household List and Selection Form” and identified by a numeric code in all other survey forms. Survey forms are designed to prevent linking harvest reports with household names. 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The survey only asks information related to harvest of birds and eggs.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

The estimated number of responses is **4,551**, totaling **379 burden hours**, and an annual dollar value of the burden hours is **\$8,095** (rounded). We used the civilian workers category from Table 1 of Bureau of Labor Statistics (BLS) News Release [USDL-18-1941](#), December 14, 2018, Employer Costs for Employee Compensation—September 2018, to calculate the cost of the total annual burden hours. Table 1 lists the hourly rate for civilian workers as \$36.63, including benefits.

In 2019, we completed a third round of optimal allocation analyses to fine-tune the amount and distribution of the sampling effort of the survey to adjust survey costs to available funding while maintaining a statistically robust sampling design (Otis and Naves 2019). Considering aspects

of data collection, a minor adjustment was made to survey a smaller number of communities but a larger total number of households. The USFWS is now seeking renewal of the survey based on this slight adjustment in the distribution of the sampling effort. This last adjustment led to an increase in burden estimates. Nevertheless, the revised survey methods (first implemented in 2016) involved a substantial reduction in burden estimates as compared to survey methods used in 2004–2015.

Table 12.1 – Burden Estimates

Requirement	Average Number of Annual Respondents	Average Number of Responses Each	Average Number of Annual Responses	Average Completion Time per Response	Estimated Annual Burden Hours*	Hourly Rate	\$ Value of Annual Burden Hours
<i>Tracking Sheet and Household Consent (FWS Form 3-2380)</i>							
Individuals	1,121	1	1,121	5 min.	93		
<i>Migratory Bird Harvest Household Survey (FWS Forms 3-2381-1, 3-2381-2, 3-2381-3, 3-2381-4)</i>							
Individuals	1,000	3*	3,000	5 min.	250		
<i>Migratory Bird Harvest Household Survey (FWS Form 3-2381-5) Cordova (Mail Survey)</i>							
	30	1	30	5 min.	3		
<i>Migratory Bird Harvest Household Survey (FWS Forms 3-2381-6 and 3-2381-7) Kodiak Roded Area Experimental Season</i>							
Individuals	200	2	400	5 min.	33		
Totals:	2,351		4,551		379		

*Rounded

Note: The Western and Interior forms (3-2381-1 and 3-2381-3; ~394 households surveyed per year) have 3 sheets (spring, summer, and fall). The Bristol Bay form has 4 sheets (spring, summer, fall, winter; ~110 households surveyed per year). The North Slope form has two sheets (spring and summer; ~150 households surveyed per year). The weighted average for the whole survey is 2.86 seasonal sheets, which was rounded as 3 answers each for burden estimates. The Cordova form has only 1 sheet (spring; ~27 households surveyed per year). The Kodiak roded area form has 2 sheets (3-2381-6 and 3-2381-7 spring and summer).

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission

public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- * **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour 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 cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The USFWS conducts this survey in partnership with diverse Alaska Native organizations, National Wildlife Refuges, and the ADF&G. The yearly cost for the federal government to administer this information collection is \$220,000 (no increase in funding since 2014). The ADF&G Division of Wildlife Conservation contributes an additional \$80,000 annually to the survey as voluntary uncommitted resources. Data collection costs include payment of field coordinators, local surveyors, costs for attending training, travel, and indirect costs. Survey coordination costs include coordination among partners (USFWS, Alaska Native organizations, and other state, federal, and private organizations); all survey materials; providing training; oversight of data collection; data entry, management, analysis, and archiving; reporting of survey results, and overhead.

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

Following a major review of the sampling design, our 2019 submission reported a burden decrease of 6,795 responses and 567 burden hours (reduced sampling effort, i.e., total households surveyed, and reduction from three household visits to a single household visit for harvest data collection). In 2019, we completed a third round of optimal allocation analyses to fine-tune the amount and distribution of the sampling effort to adjust survey costs to available funding while maintaining a statistically robust sampling design (Otis and Naves 2019). As the cost of adding communities is much higher than the cost of adding households, an adjustment was made to survey a smaller number of communities but a larger total number of households. In addition, we split the Cordova mail survey (Form 3-2381-5) out into a separate IC as we realized it was previously reported with the remaining harvest surveys as an average response of 3 submissions per year. The Cordova mail survey is only completed once per year necessitating it be a separate IC in ROCIS. Due to these updates, we are reporting a burden increase of 1,493 responses and 125 burden hours (change due to adjustment in agency estimate) associated with the updated sampling design.

We are also reporting a burden increase of 400 responses and 33 burden hours (change due to agency discretion) associated with the new Kodiak Roaded Area Experimental Season (Forms 3-2381-6 and 3-2381-7).

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

tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Harvest estimates and associated confidence intervals from the subsistence survey are available to federal and state management and conservation agencies, the Pacific Flyway Council, Alaska Native organizations, communities that participate in the survey, and the public at large. Hard copies of reports are distributed to AMBCC partners. Annual final reports are available for 2004–2018. To increase access to data generated by the survey and to facilitate its application, the 2004–2017 data book was produced to compile bird and egg harvest data (Naves and Keating 2019). Efforts are ongoing to update the online tool to download harvest estimates as electronic files on demand by selecting species and regions. Data from the AMBCC survey also have been used together with other sources of information in dedicated studies addressing priority information needs (e.g., Rothe et al. 2015, Naves 2018, Naves et al. 2019). Electronic files of annual reports, outreach materials, and other information related to the AMBCC survey are available at the program’s webpage, which is linked in the AMBCC website: <http://www.adfg.alaska.gov/index.cfm?adfg=subsistence.AMBCC>

Table 16.1. Timetable for annual data collection, analysis and reporting.

Activities	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Data collection												
Village consent	X	X										
Training	X	X										
Field Coordinator hire and train local surveyors	X	X										
Household visits		X	X									
Surveyors send surveys to Field Coordinator for review, work with surveyors to solve problems (if any). Surveyor payment.		X	X									
Field Coord send reviewed/corrected surveys to ADF&G		X	X	X								
Analysis and reporting												
Data entry and data analysis by ADF&G				X	X	X						
Review of preliminary harvest estimates by AMBCC partners							X	X	X	X	X	X
Adoption of final harvest estimates												X
Complete final annual report	X											

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.

The OMB control number and expiration date will be displayed on the forms.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.

References Cited

- George, TL, Otis D, and Doherty P (2015) Review of subsistence harvest survey, Alaska Migratory Bird Co-Management Council. Colorado State University. Department of Fish, Wildlife, and Conservation Biology. Fort Collins.
- Naves LC, Koster D, See MG, Easley B, Olson L (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 2008-05, Anchorage
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