**Supporting Statement B**

**for paperwork reduction act submission**

**Alaska Migratory Bird Subsistence Harvest Household Survey**

**OMB Control Number 1018-0124**

**Collections of Information Employing Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. The following documentation should be included in Supporting Statement B to the extent that it applies to the methods proposed:

**1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

***Sampling Universe***

Starting in 2016, the revised sampling design uses harvest estimates for 5 regions, which account for about 90% of the Alaska-wide subsistence harvest of migratory birds, as an index to the Alaska-wide harvest (Naves et al. 2021a). The 5 surveyed regions are: Bristol Bay, Yukon-Kuskokwim Delta, Bering Strait-Norton Sound, Interior Alaska, and North Slope. Sub-regions are no longer used.

Participation in the survey is voluntary at the community and household levels. For each survey year, if a selected community declines to participate or cannot be surveyed because of a major logistical constraint, an alternate community is selected. Following the geographic route established for the systematic random sampling of communities, the first alternate community is the one immediately before the originally selected community. If a first-alternate community declines to participate or cannot be surveyed because of a major logistical constraint, the community immediately after the originally selected community is selected as the second alternate. Within communities, if a selected household declines to participate or cannot be contacted after three reasonable attempts, an alternate household is randomly selected, and this process is repeated until the household sampling goal is met.

Aside the revised 5-regions design, the Cordova harvest survey started 2014 and continues to be conducted annually as required by Federal harvest regulations for the Gulf of Alaska region. Households in the communities of Cordova, Tatitlek, and Chenega that intend to participate in this harvest are required to register. At the end of the harvest season, a harvest report form is mailed to all registered households. Survey reminders are mailed 30 and 60 days after the initial mailing to registered households that had not yet provided completed surveys. Harvests reported in returned surveys are extrapolated to non-returned surveys using statistical methods.

Starting in 2021, a mail survey akin to that conducted for the Cordova harvest has been implemented for the Kodiak Island roaded area harvest as required by updated federal regulations for the Kodiak Archipelago region. To participate in the Kodiak roaded 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 are issued by the Sun’aq Tribe.

The Kodiak roaded area in-season harvest report is provided to permit holders at the time the permit is issued. Harvesters are required to record their harvest using the in-season form along the season. At the end of the season (early Sep), all permit holders are required to submit the completed form 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 mails a post-season harvest survey to permit holders who did not submit a completed in-season report. The post-season mail survey includes two reminders. Reported harvests are extrapolated to represent all permit holders based on statistical methods.

Table 1.1. Sampling design and sampling universe

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Region | Total commu-nities | Total house-holds | Total communities/  parcels1 | Communities/  parcels to be surveyed | Households to be surveyed in each community/  parcel | Total households to be surveyed |
| 5-Regions Index (in-person survey) | | | |  |  |  |
| Bristol Bay | 31 | 2,303 | 33 | 6 | 20 | 120 |
| Yukon-Kuskokwim Delta | 47 | 6,559 | 58 | 20 | 20 | 400 |
| Bering Strait-Norton Sound | 16 | 3,082 | 23 | 6 | 30 | 180 |
| North Slope | 8 | 1,959 | 14 | 4 | 40 | 160 |
| Interior Alaska | 48 | 2,872 | 43 | 7 | 20 | 140 |
| Total | 150 | 16,775 | 171 | 43 | - | 1,000 |
| Cordova Harvest (mail survey) | | | | | | |
| Gulf of Alaska | 3 | 1,009 | 3 | 3 | all registered2 | all registered |
| Kodiak roaded area (mail survey) | | | | |  |  |
| Kodiak Archipelago | - | - | - | - | all permit holders3 | all permit holders3 |

Source: Otis and Naves (2019)

1: “Communities/parcels” refer to sampling units, accounting for (a) division of large communities into parcels and (b) communities with fewer than 10 households, which were excluded from the sampling frame. Total households per community based on 2010 census.

2: In 2014–2022, the average number of registered households was 38.2 (range= 20–63).

3: In 2021-2022 the number of permit holders was 46 and 58.

***Community Participation Rate***

Community consent to conduct surveys is granted as tribal resolutions. The community participation rate was calculated as the number of communities that agreed to participate divided by the number of communities where contact was attempted. The number of communities where contact was attempted included (a) communities that agreed to participate, (b) communities that did not agree to participate, and (c) communities where multiple contact attempts were made without a response. No response from communities may suggest lack of interest or willingness to participate in the survey, but it also may also be related to conditions proper to individual communities not related to the survey (e.g., tribal office not staffed, malfunction of local communication systems). Thus, as calculated, the community participation rates may underestimate communities’ willingness to participate in the survey. Because it is often difficult to differentiate between causes of no-response, a conservative approach was chosen to calculate community participation rates.

Table 1.2. Community participation rate, including Cordova harvest.

| Survey Year | Communities contacted | Communities that agreed to participate | Participation rate |
| --- | --- | --- | --- |
| 2010 | 62 | 56 | 0.90 |
| 2011 | 33 | 32 | 0.97 |
| 2012 | 3 | 3 | 1.00 |
| 2013 | 23 | 21 | 0.91 |
| 2014 | 7 | 7 | 1.00 |
| 2015 | 23 | 19 | 0.83 |
| 2016 | 56 | 48 | 0.86 |
| 2017 | 56 | 50 | 0.89 |
| 2018 | 50 | 45 | 0.90 |
| 2019 | 43 | 40 | 0.93 |
| Overall 2010-2019 | - | - | 0.92 |

Note: Information on community participation rate is not available for 2004–2009. In 2020–2021 the AMBCC canceled the 5-regions survey due to the COVID-19 pandemic. In 2022–2023 the AMBCC canceled the 5-regions survey due to insufficient funds and internal issues. Harvest monitoring was conducted in 2020–2023 for the Cordova harvest and 2021–2023 for the Kodiak Island roaded area harvest.

***Household Response/Participation Rate***

In communities surveyed by in-person interviews (5-regions survey), the household participation rate was calculated as the number of households that agreed to participate divided by the number of households contacted. In the Cordova mail-out survey, the household participation rate was calculated as the proportion of registered households that provided a completed survey.

The overall household participation rate was 88% in 2004–2019, which is similar to other subsistence harvest surveys conducted in Alaska. For instance, overall response rates of 80%, 86%, and 84% occurred in three consecutive years of a study that assessed effects of development along Alaska’s outer continental shelf on harvests (Fall and Utermohle 1995: I12). Survey outreach and communication efforts can improve community and household participation, while issues related to hunting regulations and law enforcement efforts can reduce participation in surveys.

Table 1.3. Household participation rate, 5-regions survey.

| Survey Year | Households contacted | Households that  agreed to participate | Participation rate |
| --- | --- | --- | --- |
| 2004 | 1,615 | 1,320 | 0.82 |
| 2005 | 2,130 | 1,847 | 0.87 |
| 2006 | 1,903 | 1,605 | 0.84 |
| 2007 | 1,718 | 1,449 | 0.84 |
| 2008 | 1,101 | 962 | 0.87 |
| 2009 | 714 | 429 | 0.60 |
| 2010 | 2,005 | 1,826 | 0.91 |
| 2011 | 1,183 | 1,130 | 0.96 |
| 2012 | 272 | 262 | 0.96 |
| 2013 | 521 | 513 | 0.98 |
| 2014 | 264 | 254 | 0.96 |
| 2015 | 950 | 898 | 0.95 |
| 2016 | 486 | 451 | 0.93 |
| 2017 | 692 | 655 | 0.95 |
| 2018 | 639 | 604 | 0.95 |
| 2019 | 757 | 706 | 0.93 |
| Overall 2004-2019 | 16,950 | 14,911 | 0.89 |

Note: In 2020–2023 the AMBCC canceled the 5-regions survey due to the COVID-19 pandemic and other operational issues.

Table 1.4. Response rate, registered households, Cordova harvest.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Participation | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 |
| Registered households | 36 | 20 | 26 | 27 | 41 | 31 | 60 | 63 | 40 |
| Surveys completed | 28 | 15 | 22 | 25 | 33 | 23 | 44 | 48 | 30 |
| Participation rate | 0.78 | 0.75 | 0.85 | 0.93 | 0.81 | 0.74 | 0.73 | 0.76 | 0.75 |

Table 1.5. Response rate, individual permits, Kodiak Island roaded area harvest.

|  |  |  |
| --- | --- | --- |
| Participation | 2021 | 2022 |
| Permits issued | 46 | 58 |
| Permits reported | 42 | 51 |
| Participation rate | 0.91 | 0.88 |

**2. Describe the procedures for the collection of information including:**

**\* Statistical methodology for stratification and sample selection,**

**\* Estimation procedure,**

**\* Degree of accuracy needed for the purpose described in the justification,**

**\* Unusual problems requiring specialized sampling procedures, and**

**\* Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The 5-regions survey uses a stratified, two-stage sampling design. The distribution of the sampling effort (Table 1.1) was based on multiple rounds of optimal allocation analyses accounting for variance in harvest estimates and survey costs (Otis and Naves 2019). Regions are considered strata. Within each region, communities are first-stage sampling units and households are second-stage sampling units. For each region and year, a systematic random sample of communities is selected to be surveyed. With the objective of obtaining a geographically dispersed set of communities, in each region, communities were sequentially numbered following a geographic route (south to north, coastal to inland). A starting-point community is randomly selected, which defines the other selected communities (e.g., every 4th community in the sequentially numbered route). Communities are selected randomly regardless of their total number of households. Optimal allocation analyses were conducted to allocate the sampling effort, i.e., the number of communities and households to be sampled in each region (Otis et al. 2017).

Communities with more than 200 households were divided into parcels so that individual parcels had a maximum of 200 households. For purposes of sampling, each parcel is treated as an individual community. The number of parcels per community was based on the 2010 census; it is fixed across years and will be updated based on the 2020 census. Communities with fewer than 10 households in the 2010 census and in the 2011–2015 population estimates were excluded from the sampling frame (U.S. Census Bureau 2011; ADLWD n.d.).

**\* Estimation procedure,**

Formulas used to calculate estimated harvest, variance, and confidence interval percentage (Naves and Keating 2018a):

Community estimated harvest



(Equation 1)

Region estimated harvest



(Equation 2)

Region variance



(Equation 3.a)



(Equation 3.b) (Equation 3.c)

*i*



(Equation 3.d) (Equation 3.e)

Alaska-wide estimated harvest



(Equation 4)

Alaska-wide variance



(Equation 5)

Confidence interval at region and Alaska-wide levels



(Equation 6.a) (Equation 6.b)

*i* = communities in a region (primary sampling units)

*j* = households in a community (secondary sampling units)

*reg* = region

*AK* = Alaska-wide

 = estimated harvest

*yij* = harvest reported by jth surveyed household in the ith community



= average community harvest in a region

 = mean household harvest in sampled community *i*

m = sampled households

M *=* total households

n = sampled communities in region

N = total communities in region

R = number of regions

 = variance of harvest estimate

*f*1 = sampling fraction in regions (n/N)

*f*2i = sampling fraction in communities (mi/Mi)

*si2*= variance among households in a community

*su2*= variance among communities in a region



= confidence interval as a percentage of the harvest estimate



= coefficient of variation

**\* Degree of accuracy needed for the purpose described in the justification,**

Based on survey objectives and priorities, AMBCC partners have agreed on the goal for the confidence interval to be around 50% of harvest estimates for commonly-harvested species (George et al. 2015, Otis et al. 2016).

**\* Unusual problems requiring specialized sampling procedures,**

The subsistence harvest survey covers a large geographic area and a large number of species. Some species are abundant and harvested in relatively large numbers. Other species are harvested only occasionally because they have small populations, restricted distribution, or are not widely used for subsistence purposes. Wide-coverage sampling designs such as the AMBCC survey cannot address both commonly- and rarely-harvested species with the same level of precision (Copp and Roy 1986:11, H-15). Few data points for rarely-harvested species may result in less accurate harvest estimates and wider confidence intervals as compared to commonly-harvested species. Dedicated harvest studies and analytical procedures can allow improved harvest estimates for species that have small populations, low densities, or limited distributions, and are harvest in relatively low numbers or infrequently. Data collected in this survey have been used in such dedicated studies (e.g., Rothe et al. 2015, Naves and Zeller 2017, Naves 2018, Naves et al. 2019).

**\* Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

The survey needs to be conducted annually to adequately monitor the effect of annual hunting on populations of migratory birds. Bird populations can change because of droughts, floods, freezes, level of harvest, and ecological conditions in and breeding and wintering grounds. Levels of subsistence harvest also can vary largely because of variations in bird migration patterns, availability of other subsistence resources, socio-economic factors, and river and sea ice conditions affecting access to birds. Regions that contribute to a small proportion of the subsistence harvest of migratory birds in Alaska were not included in the 5-regions index survey. Within the 5 regions that are surveyed annually, a random sample of communities and households are selected each survey year.

**3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

The overall participation rate is 92% for communities (2010–2019) and 84% for households (Tables 1.2–4). The survey is voluntary for communities and households. Annual preliminary harvest estimates are provided to the AMBCC partners at the regional and statewide levels. Further discussion of survey methods, implementation, and results (including potential sources of bias) occur at AMBCC at large and its Harvest Survey Committee. Community and household participation rates are high and we have no indication that nonresponse bias is significantly affecting the survey data.

The spring-summer harvest of migratory birds was unlawful until 2003. Law enforcement issues have occurred in some villages in the 1950s–1970s, and fear and resentment persist. Reliable harvest estimates depend on trust and collaboration between harvesters, surveyors, and the resource management agencies that are conducting the survey. The participation of local residents as surveyors helps increase trust and minimize refusal rates.

Potential sources of bias may occur because (a) local surveyors tend to focus on surveying households with active hunters and (b) non-harvesting households seem to be prone to decline to participate in surveys. Both potential sources of bias could lead to over-estimation of harvest amounts. Field coordinator and surveyor training have stressed the importance of including non-hunting households in the survey and of enlisting their participation, following the random selection of households to be surveyed. Underreporting of take of species of conservation concern is another potential source of bias, but it is difficult to detect and to correct for this potential issue. The likelihood of this potential issue may decrease as hunters become familiar with and develop trust in the co-management process and in the harvest survey.

**4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

The layout of the harvest report form is based on surveys conducted in rural Alaska since the 1980s (Wentworth 2007a, 2007b). A detailed revision of the 2004–2007 survey methods and materials was carried out based on input from the AMBCC Harvest Survey Committee, Native partners, surveyors, field coordinators, and data management and analysis staff (Naves et al. 2008).

An assessment of the survey goals, priorities, and distribution of sampling effort was recently completed under technical leadership of a team of statisticians from the Colorado State University (George et al. 2015, Otis et al. 2016). The main objective of this review was to adjust sampling effort and costs, so they are compatible with funding available.

**5. Provide the names and telephone numbers of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.**

Original survey methods (2004–2009):

|  |  |
| --- | --- |
| **John Copp**  1773 NW 129th Place  Portland, OR 97227  phone (503) 641-3407 | **Paul Padding**  USFWS Migratory Bird Management  Laurel, MD 20708  phone (301) 497-5980  paul\_padding@fws.gov |
| **Robert Stehn**  USFWS Migratory Bird Management,  Wildlife Biologist-Biometrician  1011 E Tudor Rd, Anchorage, AK 99503  phone (907) 786-3504  robert\_stehn@fws.gov | **Virgene Hanna**  University of Alaska Anchorage, Institute of Social and Economic Research,  Survey Research Director  3211 Providence Drive, Anchorage, AK 99508  phone (907) 786-7706  anvh@uaa.alaska.edu |
| **Joel Reynolds, PhD**  Solution Statistical Consulting  6601 Chevigny St,  Anchorage, AK 99502  solutionsconsulting@ak.net |  |

Revised survey methods I (2010–2015):

|  |  |
| --- | --- |
| **Liliana Naves, PhD**  ADF&G Division of Subsistence  Research Analyst IV, AMBCC Harvest Assessment Program Coordinator  333 Raspberry Rd, Anchorage, AK 99518  phone (907) 267-2302  liliana.naves@alaska.gov | **Jim Fall, PhD**  ADF&G Division of Subsistence,  Research Program Director  333 Raspberry Rd, Anchorage, AK 99518  phone (907) 267-2359  jim.fall@alaska.gov |
| **David Koster**  ADF&G Division of Subsistence,  Resource Analyst IV, Information Management Unit  333 Raspberry Rd, Anchorage, AK 99518  phone (907) 267-2371  david.koster@alaska.gov | **Molly Chythlook**  Bristol Bay Native Association,  Natural Resources Director  Chair of AMBCC Harvest Survey Committee  P.O. Box 210, Dillingham, AK 99576  phone (907) 842-5257  mchythlook@bbna.com |

Revised survey methods II (2016–present):

|  |  |
| --- | --- |
| **T Luke George, PhD**  Colorado State University, Department of Fish, Wildlife, and Conservation Biology  Fort Collins, CO 80524  phone (970)491-6597  [paul.doherty@colostate.edu](mailto:paul.doherty@colostate.edu) | **David Otis, PhD**  Colorado State University, Department of Fish, Wildlife, and Conservation Biology  Fort Collins, CO 80524  phone (970)682-1837  dotiscsu@rams.colostate.edu |
| **Paul Doherty, PhD**  Colorado State University, Department of Fish, Wildlife, and Conservation Biology  Fort Collins, CO 80524  phone (970)226-9170  t.luke.george@colostate.edu |  |

Since 2009, the ADF&G Division of Subsistence coordinates the Harvest Assessment Program on behalf of the AMBCC. Staff of the ADF&G Division of Subsistence coordinate the annual data collection and provide data management, analysis, and reporting services. Below are key staff involved with the AMBCC Harvest Assessment Program:

|  |  |
| --- | --- |
| **Liliana Naves, PhD**  ADF&G Division of Subsistence  Research Analyst IV  333 Raspberry Rd, Anchorage, AK 99518  phone (907) 267-2302  [liliana.naves@alaska.gov](mailto:liliana.naves@alaska.gov) | **David Koster**  ADF&G Division of Subsistence  Resource Analyst IV  333 Raspberry Rd, Anchorage, AK 99518  phone (907) 267-2371  [david.koster@alaska.gov](mailto:david.koster@alaska.gov) |

**References Cited**

ADLWD (Alaska Department of Labor and Workforce Development). n.d. Research and Analysis Homepage: Population and Census.” Juneau: State of Alaska Department of Labor and Workforce Development. <http://live.laborstats.alaska.gov/pop/index.cfm>.

Copp JD and Roy GM (1986) Results of the 1985 survey of waterfowl hunting on the Yukon Kuskokwim Delta, Alaska. Anchorage.

Fall JA, Utermohle CJ (eds) (1995) An investigation of the socio-cultural consequences of outer continental shelf development in Alaska. OCS Study MMS 95-012. Vol. I: Introduction. Alaska Department of Fish and Game, Division of Subsistence, Anchorage.

George L, Otis D, Doherty P (2015) Review of Alaska migratory bird subsistence harvest survey. Colorado State University, Department of Fish, Wildlife, and Conservation Biology. Fort Collins.

Naves LC (2018) Geographic and seasonal patterns of seabird subsistence harvest in Alaska. Polar Biology 41:1217–1236.

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.

Naves LC and Zeller TK (2017) Yellow-billed loon subsistence harvest in Alaska: challenges in harvest assessment of a conservation concern species. Journal of Fish and Wildlife Management 8:114–124.

Naves LC, Keating JM, Tibbitts TL, Ruthrauff DR (2019) Shorebird subsistence harvest and indigenous knowledge in Alaska: informing harvest management and engaging users in shorebird conservation. Condor 121:1–19.

Naves LC, Mengak LF, Keating JM (2021) Alaska subsistence harvest of birds and eggs, 2019–2020, Alaska Migratory Bird Co-Management Council. Alaska Department of Fish and Game Division of Subsistence Technical Paper No. 479, Anchorage.

Otis D, George L, Doherty P (2016) Comparison of alternative designs for the Alaska migratory bird subsistence harvest survey. Colorado State University, Department of Fish, Wildlife, and Conservation Biology. Fort Collins.

Otis D, George L, and Doherty P (2017) Proposed sampling design for 2017 subsistence harvest survey of the Alaska Migratory Bird Co-Management Council. Colorado State University. Department of Fish, Wildlife, and Conservation Biology. Fort Collins.

Otis D and Naves LC (2019) Results from the 2018 subsistence harvest survey of the Alaska Migratory Bird Co-Management Council and proposed updates to the sampling design for 2019–2023. Colorado State University Alaska Department of Fish and Game, Division of Subsistence. Anchorage.

Rothe TC, Padding PI, Naves LC, Robertson GJ (2015) Harvest of sea ducks in North America: a contemporary summary. In: Savard J-PL, Derksen DV, Esler D, Eadie JM (eds) Ecology and conservation of North American sea ducks. CRC Press, Boca Raton, pp 417–467

U.S. Census Bureau (2011) Profiles of general demographic characteristics, Alaska: 2010. U.S. Department of Commerce, Washington, D.C.

Wentworth C (2007a)Subsistence migratory bird harvest survey: Bristol Bay: 2001–2005, with 1995–2005 species tables.U.S. Fish and Wildlife Service Migratory Birds and State Programs, in cooperation with Togiak National Wildlife Refuge and Bristol Bay Native Association, Anchorage.

Wentworth C (2007b)Subsistence migratory bird harvest survey: Yukon-Kuskokwim Delta: 2001–2005 with 1985–2005 species tables.U.S. Fish and Wildlife Service Migratory Birds and State Programs, in cooperation with Yukon Delta National Wildlife Refuge, Anchorage.