

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

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

Terms of Clearance: None.

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 of 1918 (MBTA; 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 (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.

In 2000, the Service created the Alaska Migratory Bird Co-Management Council (AMBCC) to implement provisions of the Amendment. The AMBCC is composed of representatives from the Service, 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 Service 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 monitoring was expanded to all subsistence eligible areas of Alaska in the context of the AMBCC harvest survey (Naves et al. 2021).

Harvest monitoring enables the Service 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 general hunt harvest in Alaska account 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.

Information collection authorized under OMB 1018-0124 includes three items: (1) 5-regions AMBCC harvest survey; (2) harvest monitoring for the Cordova harvest; and (3) harvest

monitoring for the Kodiak Island Roaded Area. 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 funding and a resulting need to refine methods. We are requesting renewal of approval including the 5-regions survey as the AMBCC may decide to do a harvest survey in the upcoming years.

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.

5-Regions AMBCC Harvest Survey

The survey collects information on the subsistence harvest in Alaska of ~60 species or categories of birds and their eggs (geese, ducks, swans, crane, ptarmigan and grouse, seabirds, shorebirds, loons and grebes). Survey data include species or category and amounts of birds and eggs taken for subsistence use by season (spring, summer, fall, winter). The survey rely on collaboration among the Service, the ADF&G, and many Alaska Native organizations. Contracts and cooperative agreements facilitate the collection of data by 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 Service. Since the beginning of the survey in 2004, twice we have re-evaluated and revised survey methods to streamline procedures and minimize respondent burden.

The Service 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 Service 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, in collaboration with Alaska Native Organizations, we hire local resident surveyors to collect the harvest data. Local surveyors provide information about the survey, compile a list of all permanent households or addresses, randomly select households to be surveyed, 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 bird harvest. To ensure anonymity of harvest information, we identify each household by a numeric code. The survey

covers spring, summer, and fall harvest in most regions. The survey uses the following currently approved forms:

- **Tracking Sheet and Household Consent (Form 3-2380):** The surveyor visits each household selected to participate in the survey to obtain household consent to participate. The surveyor uses this form to record household consent.
- **Harvest Reports (Forms 3-2381-1, 3-2381-2, 3-2381-3, and 3-2381-4):** The Harvest Report forms include drawings of bird species most commonly available for harvest in different regions of Alaska, with fields for recording numbers of birds and eggs taken. Each form has up to four sheets, one sheet for each surveyed season. Because bird species available for harvest vary in different regions of Alaska, there are four versions of the harvest report form, each for a different set of species. This helps to prevent users from erroneously recording bird species as harvested in areas where they do not usually occur. The Western and Interior forms (3-2381-1 and 3-2381-3) have three sheets (spring, summer, and fall). We use the Southern Coastal form (3-2381-2) with four seasonal sheets only in the Bristol Bay region. The North Slope form (3-2381-4) has two sheets (spring and summer). Each seasonal sheet has black and white drawings of bird species, next to which are fields to record the number of birds and eggs harvested.

Cordova Permit Household Harvest Report (Form 3-2381-5)

Federal regulations allow residents of the community of Cordova (final rule published on April 8, 2014; 79 FR 19454) and the neighboring communities of Tatitlek and Chenega (final rule published April 4, 2017; 82 FR 16298) to harvest in the area defined for the Cordova harvest. Local partners, including the Eyak Tribe and the U.S. Forest Service Cordova Office's-Subsistence Program, worked in close collaboration with the ADF&G Division of Subsistence to develop a household registration and harvest monitoring system. Data collection for the household registration is approved under OMB control number 1018-0178. Data collection for the associated harvest reporting is approved under OMB control number 1018-0124. Harvest monitoring for the Cordova harvest is done using a post-season mail survey (three mailings). The Cordova harvest report form (3-2381-5) has only one seasonal sheet (spring).

Kodiak Island Roded Area Hunter Permit Report (Forms 3-2381-6 and 3-2381-7)

On April 19, 2021, we issued a final rule (RIN 1018-BF08; 86 FR 20311) that allows migratory bird hunting and egg gathering by registration permit in the Kodiak Island Roded Area in the Kodiak Archipelago Region of Alaska for a 3-year experimental season (2021-2023). We developed regulations for the spring-summer subsistence harvest of migratory birds in the Kodiak Island Roded Area under a co-management process involving the Service, the ADF&G, and Alaska Native representatives. To participate in the Kodiak roded area harvest, harvesters must obtain a permit and to complete a permit reporting form, even if they did not harvest. Staff from the ADF&G Division of Subsistence worked in close collaboration with the Sun'aq Tribe of Kodiak to develop the permit and reporting system, which started in 2021. The Sun'aq Tribe issues the permits. Information collection for the permit is authorized under OMB Control Number 1018-0178. Information collection for the associated harvest monitoring is authorized under Control Number 1018-0124.

The Sun'aq Tribe requested in-season harvest reporting. Permit holders receive the Kodiak Roded Area In-Season Permit Report (Form 3-2381-6) at the time the permit is issued. Harvesters must record their harvest using this form along the season. At the end of the season (early September), all permit holders must submit the completed Kodiak Roded Area In-Season Permit Report 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 mail a post-season permit reporting (Form 3-2381-7) to permit holders who did not submit a completed in-season report. The post-season permit reporting includes two reminders. Reported harvests will be extrapolated to represent all permit holders, based on statistical methods. The form 3-2381-6 has one sheet and the form 3-2381-7 has two seasonal sheets (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.

Households and permit holders are asked to report their harvest using a hard-copy form. In rural Alaska, the remoteness of villages and socio-economic context result in limited access to online resources. Communication with villages by phone, fax, email, and other internet services is 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.

The AMBCC 5-regions survey 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 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 Gulf of Alaska-Cook Inlet regions, where the requirements for the Kodiak Island roaded area and Cordova harvest permit and harvest monitoring apply, are not included in the AMBCC 5-regions survey and there is no other regular survey that documents spring-summer harvest of migratory birds in these regions.

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-winter, general hunting season between the nationwide sport hunting Harvest Information Program (HIP; OMB control number 1018-0023) and the AMBCC 5-regions 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-winter 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-winter 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) Fall-winter harvests in subsistence areas 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 ADF&G 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 and permit holders are the basic sampling units. 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.

5-Regions Survey: Failure to collect harvest information would greatly weaken the Service's 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 could 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 Service 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 helps to ensure geographic and temporal coverage that will allow assessment of regional patterns of harvest and harvest variability.

Cordova and Kodiak Island roaded area harvest monitoring: 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 Service 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.

On June 26, 2023, we published in the *Federal Register* ([88 FR 41415](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on August 25, 2023. In an effort to increase public awareness of, and participation in, our public commenting processes associated with information collection requests, the Service also published the *Federal Register* notice on Regulations.gov (Docket No. [FWS-R7-MB-2023-0081](#)) to provide the public with an additional method to submit comments (in addition to the typical Info_Coll@fws.gov email and U.S. mail submission methods). We received one comment in response to that notice which did not address the information collection requirements. No response to that comment is required.

In addition to the *Federal Register* notice, we consulted with individuals (listed below) who are familiar with this collection of information to assess our time burden estimate and asked for comments on the questions below. We sent questions to potential respondents by email. We provided two reminders by email and one reminder by phone. We received responses from all nine individuals we contacted.

Organization

Alaska Dept of Fish and Game, Division of Wildlife Conservation
Alaska Dept of Fish and Game, Division of Wildlife Conservation
Alaska Department of Fish and Game, Division of Subsistence
Alaska Department of Fish and Game, Division of Subsistence
Chugach Regional Resource Commission
Native Village of Eyak, Dept of the Env. and Natural Resources
Sun'aq Tribe of Kodiak
Sun'aq Tribe of Kodiak
Ahtna Intertribal Resource Commission

Title

Assistant Director
Area Wildlife Biologist
Research Director
Wildlife Biologist
Inter-Tribal Liaison
Director
Biologist
AMBCC Liaison
AMBCC Liaison

FIVE-REGIONS AMBCC HARVEST SURVEY

"Whether or not the collection of information is necessary, including whether or not

the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments: Respondents in general agreed that harvest data are needed for harvest management and that the questions asked in the survey are necessary. Some comments referred to different perspectives among diverse stakeholders on how the data should be collected and used.

Agency Response/Action Taken: Alaska is the only state in the U.S. with a legally authorized harvest of migratory birds during the spring-summer season for subsistence purposes. This harvest was authorized by the 1997 amendment to the Migratory Bird Treaty Act to address traditional uses by indigenous inhabitants of Alaska. Since at least the 1960s, management of harvest migratory birds for subsistence uses in Alaska has been a controversial topic including diverse perspectives. Within this context, the AMBCC regular harvest survey has undergone two extensive, collaborative processes (in 2008-2010 and 2014-2019) to review and revise survey methods. Reconciling perspectives about and goals for harvest assessment remains a challenge for harvest management of migratory birds for subsistence uses in Alaska. Partners of the Alaska Migratory Bird Co-Management Council, including Federal, State, and Indigenous representatives remain engaged working on these topics.

“The accuracy of our estimate of the burden for this collection of information”

Comments: Respondents considered that the time estimated to complete the associated forms is adequate.

Agency Response/Action Taken: Not applicable.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comment 1: One respondent suggested the use of tools to minimize memory bias, such as a calendar for respondents to write down their harvest along the seasons.

Agency Response/Action Taken: Such tools have been considered by the AMBCC Harvest Survey Committee during the development of the original survey methods (2000-2002) and two survey review processes (2008-2010 and 2014-2019). Such a tool was used in 2004-2009, but it was discontinued in 2010 because of tradeoffs related to logistical challenges and socio-cultural context.

Comment 2: One respondent suggested clarification to wording on the Tracking Sheet and Household Consent (Form 3-2380), column “comments”.

Agency Response/Action Taken: We updated the form to include this suggestion.

“Ways to minimize the burden of the collection of information on respondents”

Comments: Respondents did not provide comments or suggestions.

Agency Response/Action Taken: Not applicable.

CORDOVA HARVEST SURVEY

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments: Respondents felt that the information is necessary and has practical utility.

Agency Response/Action Taken: Not applicable.

“The accuracy of our estimate of the burden for this collection of information”

Comments: Respondents considered that the time estimated to complete the associated forms is adequate.

Agency Response/Action Taken: Not applicable.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: (a) One respondent suggested including an in-season harvest tracking calendar to use as a reference of the harvest survey. (b) One respondent proposed to collect additional information on dates of egg harvest and weather conditions.

Agency Response/Action Taken: The survey methods were developed in close collaboration with local partners, who preferred a post-season survey. The survey intended to be concise and collect information only to quantify harvest. We compiled anonymized comments and shared with local partners for their consideration.

“Ways to minimize the burden of the collection of information on respondents”

Comments: One respondent suggested using online methods for collecting the harvest data.

Agency Response/Action Taken: In rural Alaska, the remoteness of villages and socio-economic context result in limited access to online resources. 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. We provide a phone number with the survey and sometimes, registered households call to provide information by phone (most often no harvest). For those cases, we complete a form on behalf of the reporting household.

Additional comments received during the outreach:

Comments: (a) One respondent found it helpful that the form shows bird drawings (instead of listing names only), as people may use different names for birds. (b) One respondent considered changes to harvest regulations and potential changes to harvest monitoring.

Agency Response/Action Taken: (a) Not applicable. (b) Changes to harvest regulations have not yet been proposed.

KODIAK ISLAND ROADED AREA PERMIT

“Whether or not the collection of information is necessary, including whether or not the information will have practical utility; whether there are any questions they felt were unnecessary”

Comments: Respondents felt that the information is necessary and has practical utility.

Agency Response/Action Taken: No response required.

“The accuracy of our estimate of the burden for this collection of information”

Comments: Respondents considered that the time estimated to complete the

associated forms is adequate.

Agency Response/Action Taken: No response required.

“Ways to enhance the quality, utility, and clarity of the information to be collected”

Comments: One respondent considered memory bias issues and asked about possibilities to ground truth the data.

Agency Response/Action Taken: At the request of the local Tribe, the survey includes in-season harvest reporting to minimize memory bias. Due to usual low response rates using in-season reporting, a post-season mail survey is used to complement the in-season harvest reporting.

“Ways to minimize the burden of the collection of information on respondents”

Comments: One respondent considered in-season and post-season reporting as redundant.

Agency Response/Action Taken: The local Tribe specifically asked for in-season harvest reporting. However, response rates via the in-season reporting are low. Anticipating this possibility, we developed a post-season reporting, which also functions as reminders for sending the in-season report. Permit holders are asked to complete only one report. We do not mail post-season surveys to permit holders who provided an in-season report.

Additional comments received during the outreach:

Comments: (a) One respondent suggested specifically naming on the form the species of swan that is open to harvest (Tundra Swan) instead of listing the category “swan”. (b) One respondent asked what means “loon 4” listed by the drawing of a Common Loon.

Agency Response/Action Taken: (a) Trumpeter swan occurs in the area and is not opened to harvest. Tundra and Trumpeter swans are often challenging to tell apart. When collaboratively developing the survey form, we chose the wording “swan” to consider the possibility of species misidentification. (b) Bird names can be confusing, so we present bird drawings as the main source of information for species identification in harvest surveys. Species that include the word “common” in their vernacular name (e.g., Common Loon, Common Goldeneye, Common Merganser) may not be the most common species of that kind in a defined area. Based on previous research on local ethnotaxonomy (Naves and Zeller 20), we follow the recommendation to avoid in harvest surveys the use of vernacular birds names including the word “common”.

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 **4,371**, totaling **364 burden hours**, and an annual dollar value of the burden hours is **\$15,747** (rounded).

Based on the number of permits issued in recent years for the Kodiak Island Roaded Area, we are updating the expected number of responses from 200 to 100. Based on the number of household registrations issued in recent years for the Cordova harvest, we are updating the expected number of responses from 30 to 50. At this time there are no changes to parameters used in burden estimates for the 5-regions survey.

We used the civilian workers category from Table 1 of Bureau of Labor Statistics (BLS) [News Release](#) USDL-23-1971, September 12, 2023, Employer Costs for Employee Compensation—

June 2023, to calculate the cost of the total annual burden hours. Table 1 lists the hourly rate for individuals as \$43.26, including benefits.

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	\$ 43.26	\$ 4,023.18
<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	43.26	10,815.00
<i>Migratory Bird Harvest Household Survey (FWS Form 3-2381-5) Cordova (Mail Survey)</i>							
Individuals	50	1	50	5 min.	4	43.26	173.04
<i>Migratory Bird Harvest Household Survey (FWS Forms 3-2381-6 and 3-2381-7) Kodiak Roded Area Experimental Season</i>							
Individuals	100	2	200	5 min.	17	43.26	735.42
Totals:	2,271		4,371		364		\$ 15,746.64

*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 (3-2381-5) has only 1 sheet (spring; expected ~50 households surveyed per year). The Kodiak roded area forms have 2 sheets (spring and summer); respondents are asked to answer only one of these forms either the in-season (3-2381-6) or the post-season (3-2381-7) version.

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 Service 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**. In 2014-2020, the ADF&G Division of Wildlife Conservation contributed 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 (Service, 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.

We are reporting a burden reduction due to change in agency estimate of -180 annual responses and -15 annual burden hours.

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 2004-2019. Summary results for the Cordova harvest are available for 2014-2022. Summary results for the Kodiak Island Roaded Area harvest are available for 2021-2022. To increase access to data generated by the survey and to facilitate its application, the 2004-2020 data book was produced to compile bird and egg harvest data (Naves et al. 2021). 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: <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
- Naves LC (2018) Geographic and seasonal patterns of seabird subsistence harvest in Alaska. *Polar Biology* 41:1217–1236.
- 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, Knight AJ, Mengak (2021) Alaska subsistence harvest of birds and eggs, 2004–2020, Alaska Migratory Bird Co-Management Council. Alaska Department of Fish and Game, Division of Subsistence Special Publication 2021-05, Anchorage
- Otis D, George TL, and 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 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
- 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