

Appendix 5

Guidance Concerning the Adequacy and Use of Data for Making 810 Evaluations

Compliance with ANILCA Section 810

As specified in ANILCA, Section 810 Evaluations must be done with the best information that is available during the timeframe given to accomplish the evaluation. In the absence of information on subsistence activities and resources in the area of a proposed action, it must not be assumed that such activities and resources do not occur. Given the scope of the project and the need for adequate subsistence data, it may be possible to conduct an inventory of area and/or site specific subsistence uses, provided that funding and employee resources are available. However, it may be necessary to make an evaluation based on reasonable predictions of activities and resources for a given area, based on information from associated or similar areas located within the region.

The following² is a useful overview from the Office of Subsistence Management of some of the most readily available sources of information on subsistence use in Alaska.

Ethnographic accounts and community studies: Early ethnographic literature concerning Alaska Native cultures provides excellent descriptions of indigenous subsistence use patterns. However, some of the best ethnographies describing Alaska Native hunting and fishing patterns may describe hunting, fishing, and gathering activities that took place 50 to 100 years ago or longer. While these sources demonstrate the time depth of subsistence uses, they may not describe current use patterns. In addition, these ethnographic sources typically provide information on Alaska Native use of resources, and ANILCA refers to rural uses.

More contemporary sources include the large number of community and topical studies conducted to document subsistence uses and investigate the potential impact of Federal land use actions on subsistence uses. These sources include studies funded by Federal agencies preparatory to the passage of ANILCA, as well as environmental impact statements, and studies commissioned by the Bureau of Land Management and the Minerals Management Service in connection with Outer Continental Shelf leasing. Subsequent to the passage of the State subsistence law, the State ADF&G Division of Subsistence has been the lead organization in conducting subsistence field studies, although regional Native organizations and tribes also have undertaken subsistence fieldwork. The State Division of Subsistence technical paper series includes about 300 titles and covers community and topical studies throughout Alaska. While they are key sources of information for subsistence analyses, community studies are not available for all of the State's rural communities. For communities that have not been studied, staff anthropologists typically generalize from what has been collected from near-by communities.

Mapped data: In addition to providing contemporary subsistence ethnography, the Division of Subsistence and others have mapped where community subsistence uses occur. Mapping methodologies, developed in the early 1980s, have been applied throughout Alaska, although mapping has not occurred in all rural communities. These mapped data can provide an approximation of the extent and intensity of subsistence uses. However, mapped data have been

² Excerpt from: *Office of Subsistence Management, Issues and Points to Consider in Writing Customary and Traditional Use Determination Analyses, Draft prepared April 28, 2005.*

collected using varying methodologies, so that data may not be comparable across all communities and areas. In addition, mapped data have a static quality and may be dated for certain species. For example, the Western Arctic Herd caribou population has been at an all-time high, and mapping of current subsistence use areas might not be consistent with mapping done twenty years ago or in the future.

Household harvest survey data and ADF&G harvest reports: Two main published or gray literature sources for subsistence harvest data exist: 1) household harvest survey data and 2) ADF&G harvest ticket reports. The Division of Subsistence developed household harvest survey methodologies in the early 1980s. The Division uses a random face-to-face survey methodology to gather retrospective harvest data in study communities; resulting data provide an estimate of the household, per capita, and community harvest levels for all fish, wildlife, and plant species taken in the year prior to survey administration. Raw harvest data are converted into ‘food weight’ to allow inter-community and inter-regional comparability of data. Summaries of the Division of Subsistence household harvest survey data are available via the Internet using the Community Profile Data Base (<http://www.subsistence.adfg.state.ak.us/geninfo/publctns/cpdb.cfm>).

Household harvest surveys have not been undertaken in all communities, nor are they repeated on an annual basis. Sometimes harvest surveys are only conducted one year. In addition, they are often dated and may not accurately reflect current harvest levels. While overall harvest quantity of all species, as expressed in per capita food weight, tends to remain constant from year to year, harvest composition tends to be dynamic and variable across years. As a result, one year of harvest information may not accurately capture and reflect the inherent variability in subsistence systems.

In addition to survey data, fish and wildlife harvest information are collected from State harvest tickets and State and Federal permits by ADF&G and the USFWS as part of their management programs. These data provide annual estimates of the harvest of certain fish and wildlife species. They are useful in tracking reported harvest of resources such as salmon, brown and black bear, deer, moose, goat, caribou, sheep and muskox. However, because many rural residents do not participate in the voluntary or mandatory reporting, these data may not accurately report the actual harvests of rural communities. This problem may be most acute with certain species and certain areas of the state where seasons, harvest limits, and reporting requirements are not reflective of local subsistence harvest and use practices. Another limitation of this source is that a small number of communities don’t have post offices. In these cases these communities are lumped with communities that have post offices, resulting in grouping or “lumping” of the data.

Nonpublished sources: Nonpublished sources of information on subsistence use includes testimony presented and discussion occurring at regional advisory council meetings, as well as information provided by knowledgeable individuals, management professionals, and others. These sources need to be cited appropriately in the evaluation.