

NPS Comments on Pebble Project Draft Environmental Impact Statement

4.9 Subsistence

Chapter 4.9.2.4 Changes in Sociocultural Dimensions of Subsistence: The EIS states that the project would result in both beneficial and adverse effects on sociocultural dimensions of subsistence. The beneficial effects are economic: Increase in base income for local residents would lead to more money to use for subsistence equipment, supplies and operating costs. An adverse effect is that project-related employment may reduce the time available for subsistence hunting. The analysis minimizes or omits an important potential adverse effect of the project: Interruptions and discontinuations in the process of transmission of Traditional Ecological Knowledge (TEK).

In the last paragraph of p. 4.9-8, the EIS says that increased employment of adults would impact their time spent training young people to subsistence hunt and fish, thus impacting the amount and quality of traditional knowledge passed on to younger generations. This is the only mention of traditional knowledge in this section, and there is no definition of traditional knowledge. The next sentence is “Households and communities would have to adjust to new roles of subsistence labor, changes in sharing networks, and possible changes in harvest levels.” There is no discussion of less tangible cultural aspect of the transmission of traditional knowledge, such as cultural continuity of beliefs and values connected with subsistence, as well as the younger generation’s confidence in the older generation.

The NPS (2018) defines TEK as “...the ongoing accumulation of knowledge, practice and belief about relationships between living beings in a specific ecosystem that is acquired by indigenous people over hundreds or thousands of years through direct contact with the environment, handed down through generations.” Unlike Western science, TEK is inseparable from the social and spiritual context of the culture, and represents a tradition of interpreting relationships in the natural world, passed down from one generation to the next (Kimmerer, 2002).

Chapter 3.1.3.1 discusses TEK and the approach the US Army Corps of Engineers(USACE) took in incorporating TEK into this EIS. The USACE proposed to review scoping comments, pertinent sections of the 2014 EPA watershed assessment and Environmental Baseline Document (Stephen R. Braund & Associates 2011), and relevant statements about TEK from government-to-government meetings. The EIS sees TEK as a body of knowledge about climate, landscapes, and subsistence resources, but this characterization does not capture its cultural significance. Because TEK is an accumulation of data acquired over thousands of years, the depth and breadth of this knowledge is vast. Comments compiled from public meetings will not adequately document TEK.

In Appendix K of the EIS, Section K3.1, offers some examples of TEK regarding subsistence uses in the study area. These are taken from the Environmental Baseline Document done in 2011, which included tables, charts and maps derived from surveys and interviews, or from an EPA study of TEK in the EPA watershed assessment (2014) based on interviews in the region in 2013. Other information said to qualify as TEK was taken from review by cooperating agencies or from tribal consultation. The examples are statements about fish, animals and other resources

on the lands proposed for development. There is little cultural context and in many cases seem more like recent observations than TEK passed down over generations.

Recommendation: Several studies conducted over the last two decades provide good examples of TEK specific to the project area. For example, for Stickman et al. 2003, key interview respondents provided information relating to past and present fishing practices; geographic locations including Dena'ina place names of traditional fishing areas; changes in the relative abundance of sockeye salmon and other freshwater fish used for subsistence and observations of change in the environment. Another source of TEK specific to knowledge about caribou in the project area, Van Lanen et al 2018, provides key information on caribou distribution over the previous 50 years; shifts in subsistence uses of caribou, particularly related to access, geospatial information through participatory landscape mapping including vegetation change; local observations of caribou herd, and integration of local and western scientific knowledge. Deur et al. 2018 provides information relating to the values, meaning, beliefs and relationship of the land to the Dena'ina people along with observations of changes to the landscape and watersheds over time. Evanoff 2010, Gaul 2007, Jones et al. 2013, Stanek et al. 2006 also provide TEK specific to the project area. If the EIS intends to recognize all the impacts of the proposed project on sociocultural dimensions of subsistence, it must more fully incorporate possible interruptions and discontinuations in implementation and transmission of TEK.

References:

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Stickman, Karen, Andrew Balluta, Mary McBurney, Dan Young, and Karen Gaul. 2003. K'ezdlagh: Nondalton Traditional Ecological Knowledge of Freshwater Fish. Anchorage, Alaska: U.S. Fish and Wildlife Service, Fisheries Information Services, Project 01-075.

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