7. SUBSISTENCE

Subsistence uses are central to the customs and traditions of many cultural groups in Alaska, including the peoples of Interior Alaska. Their customs and traditions encompass processing, sharing, redistribution networks, cooperative and individual hunting, fishing, and ceremonial activities. Both Federal and state regulations define subsistence uses to include the customary and traditional uses of wild renewable resources for food, shelter, fuel, clothing, and other uses (Alaska National Interest Lands Conservation Act, Title VIII, Section 803, and Alaska Statute [AS] 16.05.940[33]). The Alaska Federation of Natives (AFN) not only views subsistence as the traditional hunting, fishing, and gathering of wild resources but also recognizes the spiritual and cultural importance of subsistence in forming their worldview and maintaining ties to their ancient cultures (AFN, 2005).

Subsistence fishing and hunting are traditional activities that help transmit cultural knowledge between generations, maintain the connection of people to their land and environment, and support healthy diet and nutrition in almost all rural communities in Alaska. The Alaska Department of Fish and Game (ADF&G) estimates that the annual wild food harvest in Interior Alaska is approximately 6,360,000 pounds, or 613 pounds per person per year (Wolfe, 2000). Subsistence harvest levels vary widely from one community to the next. Sharing of subsistence foods is common in rural Alaska and can exceed 80 percent of households giving or receiving resources (ADF&G, 2001b). The term harvest and its variants—harvesters, harvested—are used as the inclusive term to characterize the broad spectrum of subsistence activities, including hunting and fishing.

This chapter summarizes the regulations governing subsistence uses in the proposed Northern Rail Extension (NRE) area (Section 7.1), describes subsistence resource uses (Section 7.2), and analyzes the potential impacts on subsistence uses resulting from the NRE (Section 7.3) by examining direct and indirect effects of construction and operations. Appendix I describes the methodology for evaluating subsistence use areas and provides baseline data and potential impacts on subsistence communities. Appendix O contains the ANILCA Section 810 analysis of subsistence impacts.

7.1 Applicable Regulations

The U.S. Congress adopted ANILCA recognizing that “the situation in Alaska is unique” regarding food supplies and subsistence practices. ANILCA specifies that any decision to withdraw, reserve, lease, or permit the use, occupancy, or disposition of public lands must evaluate the effects of such decisions on subsistence use and needs (16 United States Code [U.S.C.] 3111-3126). In 2005, the Departments of the Interior and the Department of Agriculture established a Federal Subsistence Board to administer the Federal Subsistence Management Program (70 *Federal Register* [*FR*] 76400). The project area is comprised of private, state, and Federal (military) lands. Alaska and the Federal Government regulate subsistence hunting and fishing in Alaska under a dual management system. The Federal Government recognizes subsistence priorities for rural residents on Federal public lands, while Alaska considers all residents to have an equal right to participate in subsistence hunting and fishing when resource abundance and harvestable surpluses are sufficient to meet the demand for all subsistence uses and other uses.

The Alaska Board of Fisheries and the Alaska Board of Game have adopted regulations enforced by the state for subsistence fishing and hunting on all State of Alaska lands and waters and lands conveyed to Alaska Native Claims Settlement Act (ANCSA) groups. The Federal Subsistence Board has adopted regulations that are enforced by the Federal Government for subsistence fishing and hunting on Federal public lands, and federally reserved waters in Alaska.

7.1.1 State Regulations

State law is based on Title 16 of Alaska Statutes (AS 16) and Title 5 of the Alaska Administrative Code (AAC) (05 AAC 01, 02, 85, 92, 99) and regulates state subsistence uses. Under Alaska law, when there is sufficient harvestable surplus to provide for all subsistence uses and other uses, all residents qualify as eligible subsistence users. The state distinguishes subsistence harvests from personal use, sport, or commercial harvests based on where the harvest occurs, not where the harvester resides. More specifically, state law provides for subsistence hunting and fishing regulations in areas outside the boundaries of "nonsubsistence areas," as defined in state regulations (5 AAC 99.015). The nonsubsistence areas include the areas around Anchorage, Matanuska Susitna Valley, Kenai, Fairbanks, Juneau, Ketchikan, and Valdez (Wolfe, 2000).

7.1.2 Federal Regulations

The Federal Subsistence Board under Title VIII of ANILCA and regulations found in 36 Code of Federal Regulations (CFR) 242.1 and 50 CFR 100.1, recognizes and regulates subsistence practices for rural residents. Federal regulations recognize subsistence activities based on a person's residence in Alaska, defined as either rural or nonrural. Only individuals who permanently reside outside federally designated nonrural areas are considered rural residents and qualify for subsistence harvesting on Federal lands.

However, Federal subsistence regulations do not apply to certain Federal lands regardless of their rural designations. These include lands withdrawn for military use and closed to general public access (50 CFR Part 100.3). The Final Rule, *Subsistence Management Regulations for Public Lands in Alaska, Subpart A*, further clarifies decisions regarding why subsistence regulations do not apply to military lands (36 CFR Part 242, 50 CFR Part 100):

> [t]he military lands, including U.S. Coast Guard, and Federal Aviation Administration have never been included in the Federal Subsistence Management Program because of national security and defense reasons. These lands have been and are closed to access by the general public, and are, therefore, not available for use by rural Alaska residents for harvest of subsistence resources. (70 *FR* 76400)

In Alaska, the general public may obtain a Recreation Access Permit (RAP) to access certain Interior military lands for sport hunting, sport fishing, trapping, off-road recreational vehicle use and other recreational activities (U.S. Army Alaska [USARAK], 2005). Federal lands near and within the project area boundaries include the Tanana Flats and Donnelly Training Areas, as well as Eielson Air Force Base (AFB) and Fort Greely. The Chena Lakes Flood Control Project, managed by the U.S. Army Corps of Engineers for flood control and recreation, is also located in the project area, and allows for sport hunting and fishing activities under state regulations (see Figure 7-1).

7.2 Affected Environment

The entire project area lies in ADF&G's Fairbanks nonsubsistence area (5 AAC 99.015(a)(4); Figure 7-1). Therefore, under state definitions, all harvests of wildlife and fish in the project area do not qualify as subsistence activities and are instead managed under general sport hunting regulations, or by personal use or sport fishing regulations.. However, subsistence users may harvest subsistence resources that migrate through or use the project area from locations outside of the state-designated nonsubsistence area.

All residents outside the Fairbanks nonrural area (Fairbanks North Star Borough) are considered rural and are eligible for subsistence harvesting on Federal lands (see Figure 7-1). As discussed in Section 7.1.1, Applicable Regulations, Federal subsistence regulations do not apply to Federal land withdrawn for military use. Instead, state sport hunting and fishing regulations govern all hunting and fishing activity on military land. However, the U.S. Army Garrison Alaska (USAG-AK) at Fort Wainwright, which manages the Tanana Flats and Donnelly Training Areas, acknowledges that subsistence users, under sport regulations, do use subsistence resources on USAG-AK lands, and the USAG-AK is responsible for managing those resources for subsistence users (USAG-AK 2006a). Furthermore, the USAG-AK recognizes that "USAG-AK lands were traditionally used for subsistence activities by Alaska Natives. USAG-AK has a trust responsibility to conserve these subsistence resources" (USAG-AK, 2006a:23).

Regarding the military lands in and near the project area, specifically the Tanana Flats and Donnelly Training Areas (see Figure 7-1), the USAG-AK recognizes the areas' importance to the subsistence way of life for regional populations including residents of Healy Lake, Dot Lake, Tanacross, Tetlin, Northway, Delta Junction, Big Delta, Deltana, and Dry Creek (USAG-AK, 2006b). Several additional communities are also recognized by the U.S. Army including Minto, Nenana, and Cantwell as having subsistence interests on army lands in Alaska (USARAK, 2004). Furthermore, previous literature shows subsistence use areas for Healy Lake, Dot Lake, Tanacross, Tok, Minto, and Nenana in or near the project area (see Section 7.2.3 Communities). The moose harvest tickets collected by ADF&G are the source of data for this. In Alaska, a harvest ticket is required in most areas for general hunts for deer, moose, caribou, and sheep. The tickets are available free from license vendors, must be carried in the field, and are validated by cutting out the day and month immediately upon taking game. Moose harvest ticket records, sent to ADF&G by moose harvesters, describe the date, location, and success of hunts within or near the project area by residents of Cantwell, Delta Junction, Dot Lake, Minto, Nenana, Salcha, and Tok (ADF&G, 2007c).

7.2.1 Subsistence Access

Subsistence users use land and waterway routes to reach harvest areas located in and near the project area. Watercraft and off-road recreational vehicles constitute the primary modes of transportation to these areas. The U.S. Army publishes maps of hunting areas to guide use and access on military lands (*e.g.*, USARAK 2008). There are established trails and cleared corridors, including traplines that harvesters follow within the project area and to lands outside the project area. Traplines, which have a history of long-term repeated use, are susceptible to changes in access given that they are usually a defined linear route on which a user has spent considerable effort to establish and maintain. It is a common practice for individuals to claim

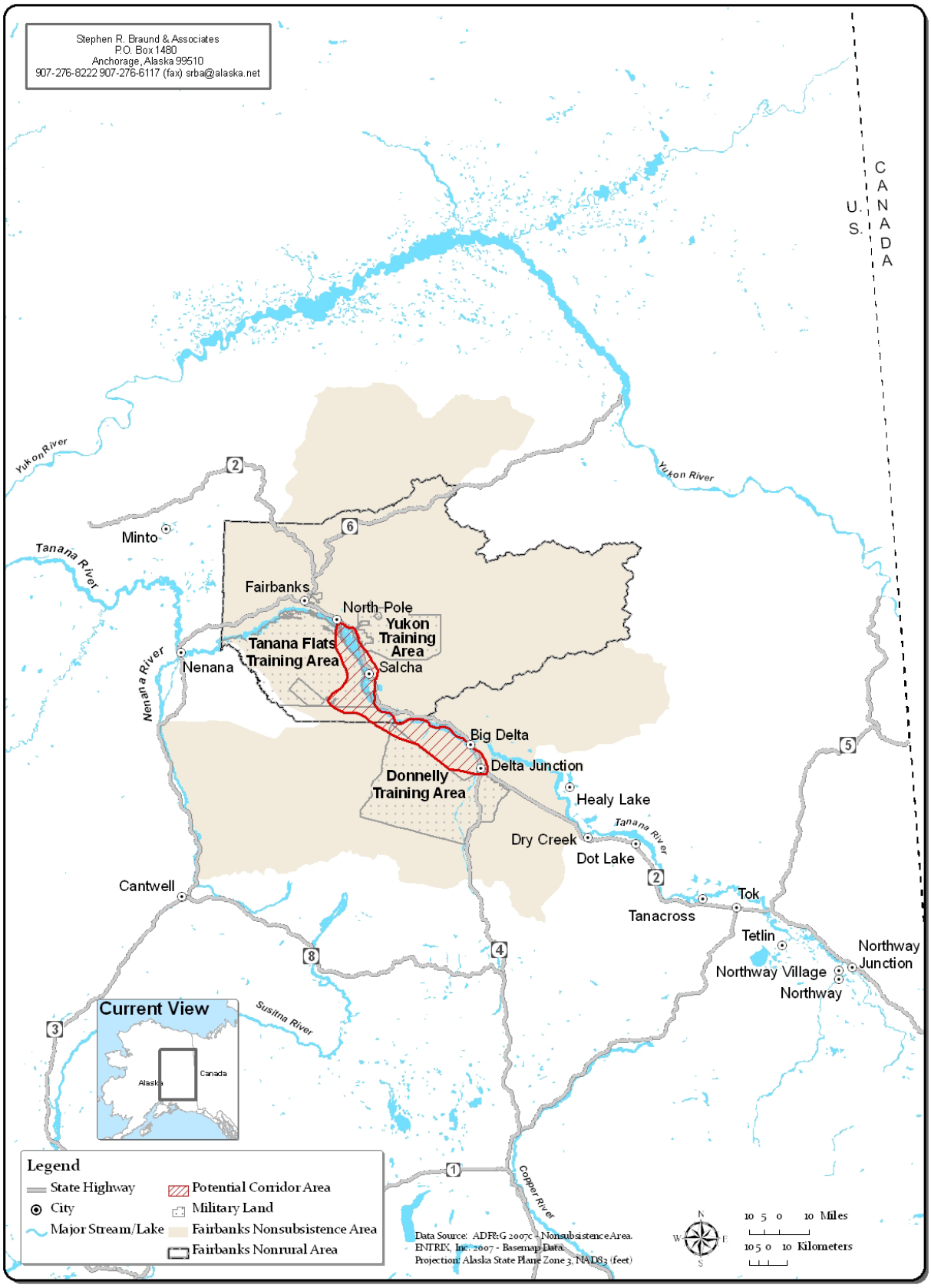

Figure 7-1 – NRE Project Area

"ownership" of a particular trapline, even if they do not own the land, and trappers generally respect each individual's traplines. Little documentation of specific traplines within the project area has been done in the past. Traplines are accessed during the winter months, often by snowmachine, when fur pelts are in prime condition. Chapter 12, Navigation, and Chapter 13, Land Use, describe of current policies regarding access to private, state, and military lands in the project area.

7.2.2 Resource Availability

Subsistence users harvest a variety of wildlife and fish resources as well as other non-game resources (*e.g.*, plants and berries) in and near the project area. The majority of the project is located in ADF&G's Game Management Unit (GMU) 20, subunit 20A (see figure I-1). GMUs are areas of the state defined by ADF&G, each with its own set of regulations governing the harvest limit and timing of hunts for various wildlife species in that unit. Many of the GMUs are further divided into subunits with additional regulations. ADF&G Tanana River Drainage regulations govern sport fishing in the project area. Under state sport hunting and fishing regulations for ADF&G GMU 20A and the Tanana River drainage, Alaska residents can harvest several species of big game, including moose, black bear, grizzly bear, sheep, and caribou as well as small game species and seasonally available migratory waterfowl. Arctic grayling, whitefish, Dolly Varden, northern pike, trout, and several species of salmon are available in nearby lakes, streams, and rivers. ADF&G trapping regulations for GMU 20A allow for the trapping of wolf, wolverine, beaver, coyote, red fox, lynx, marten, mink, weasel, muskrat, river otter, squirrel, and marmot. In recent years trapping has declined in many areas of Alaska due to a drop in fur prices and increase in gas costs; this in turn has led to an increase in resource availability of some furbearer species. A 2007 Furbearer Management Report by ADF&G for the central and lower Tanana Valley states that trapping remains an important use of wildlife resources today that can significantly contribute to the economies of rural areas through cash income and also provide food and clothing for personal use (ADF&G, 2007f). Alaska does not regulate the taking of non-game resources such as berries, medicinal plants, or wood. Chapter 5, Biological Resources, provides more information on the wildlife, fish, and vegetation resources in the project area.

7.2.3 Communities

SEA identified 12 communities for this subsistence analysis based on:

- Their proximity to the NRE,
- Documented subsistence uses in and near the proposed rail line, and
- The U.S. Army's recognition of communities with subsistence interests on nearby military lands.

Appendix I summarizes each of the 12 study communities' subsistence uses. This includes descriptions of the seasonal round, which is the cycle by which hunters exploit different resources throughout the year as they become available. The process often means moving subsistence activities to different areas several times a year to maximize several kinds of subsistence harvests across different use areas. The subsistence use area maps in Appendix I depict the project area overlaid on each community's documented subsistence use areas (where available). Of the 12 study communities, Cantwell, Delta Junction, Dot Lake, Healy Lake,

Minto, Nenana, Salcha, and Tok have documented use areas in the project area or reported moose harvests in minor drainages (harvest areas assigned by ADF&G based on reported harvest locations) that overlap the project area (Table 7-1). The Tanacross use areas are located within 25 miles of the project area. The majority of the Cantwell, Dot Lake, Healy Lake, Minto, and Tok use areas are not located near the proposed NRE and would not be directly affected. Lifetime use areas for Healy Lake overlap the project area and indirect effects could occur because of those residents' ties to those traditional use areas.

While the data in Table 7-1 show some overlap of subsistence use areas or harvest activities in the project area, the majority of each communities' subsistence use area lies outside the project area. Given the available data, use of the project area for subsistence activities is relatively low. However, subsistence use area data are not available for some communities located near or in the project area (*e.g.*, Delta Junction and Salcha), thus the precise level of subsistence uses in the project area for those communities is unknown.

Table 7-1
Overlap of Subsistence Use Areas and Moose Harvesters in the Project Area[a]

Community	Subsistence Use Area Overlaps NRE Area[b]	Number of Moose Harvesters Overlaps NRE Area 1983–2006[b]	Total Moose Harvesters in GMU 20A Minor Drainages 1983–2006[b]
Cantwell [c]	No	3	109
Delta Junction	N/A	302	389
Dot Lake [d]	No	2	3
Dry Creek	N/A	N/A	N/A
Healy Lake [e]	Yes	N/A	N/A
Minto [f]	No	2	4
Nenana [g]	No	33	283
Northway [h]	No	N/A	N/A
Salcha	N/A	184	284
Tanacross [i]	No	N/A	N/A
Tetlin [j]	No	N/A	N/A
Tok [i]	Yes	17	22

[a] Data source is ADF&G, 2008d, unless otherwise noted.
[b] N/A = not available
[c] Stratton, 1984
[d] Martin, 1983
[e] Stephen R. Braund & Associates, 2002
[f] Andrews, 1988
[g] Shinkwin and Case, 1984
[h] Case, 1986
[i] Marcotte, 1991
[j] Halpin, 1987

7.2.4 Competition

Harvesters from the 12 study communities may already experience competition for subsistence resources on or near the project area lands. The majority of the proposed rail extension is located within GMU 20A, where hunting is permitted for all Alaskan residents. Thus, residents from the

12 communities hunting in GMU 20A may not only compete with one another but also with hunters from other Alaskan communities, including Fairbanks and Anchorage. Table 7-2 presents the number of harvesters and success rates by community for moose in GMU 20A from 1998 through 2007. From 2005 to 2007, GMU 20A had the highest total number of moose harvesters and successful moose harvests of any GMU subunit within the state (Table 7-3).

Table 7-2
1998–2007 GMU 20A Moose Harvesters by Community [a]

Community [b]	Success Rate (% of moose harvesters)	Total Harvesters (1998-2007) [c]	Harvesters (% of Population)
Fairbanks	29.4	7,602	35.5
North Pole	30.9	3,441	16.0
Anchorage	27.4	2,241	10.5
Wasilla	32.4	1,168	5.5
Delta Junction	**35.8**	**643**	**3.0**
Healy Lake	**26.9**	**633**	**3.0**
Eagle River	26.1	614	2.9
Palmer	28.5	558	2.6
Nenana	**24.3**	**444**	**2.1**
Salcha	**29.0**	**390**	**1.8**
Anderson	18.1	363	1.7
Eielson AFB	31.7	357	1.7
Chugiak	32.6	218	1.0
Fort Wainwright	25.1	207	1.0
Soldotna	35.2	202	0.9
Juneau	32.6	178	0.8
Ester	36.5	178	0.8
Valdez	36.9	168	0.8
Cantwell	**34.5**	**29**	**0.1**
Tok	**43.0**	**7**	**0.0**
Dot Lake	**100.0**	**1**	**0.0**
Minto	**100.0**	**1**	**0.0**
Other	35.2	1,785	8.3
Totals	30.0	21,428	100.0

[a] Data source is ADF&G, 2007c
[b] Study communities are presented in bold font.
[c] Includes study communities and communities reporting five or more hunters in each of the study years. All other communities are included under Other.

7.3 Environmental Consequences

This section provides a general discussion of methodology and the analysis of impacts. Chapter 20 of the EIS describes proposed mitigation for impacts to subsistence.

Table 7-3
2005-2007 State of Alaska Moose Harvesters by Subunit [a]

	Unit Location	Subunit	Total Successful Harvesters	Total Harvesters	Percent of Total Harvesters
2007	Fairbanks - Central Tanana	20A	962	3,772	12.1
	Fairbanks - Central Tanana	20B	762	3,258	10.4
	Matanuska Susitna Valley	14A	417	2,813	9.0
	Fairbanks - Central Tanana	20D	806	1,739	5.6
	Kenai	15C	230	1,309	4.2
	Nelchina - Upper Susitna	13A	206	1,137	3.6
	Kenai	15A	113	1,116	3.6
	Remainder of State	78 Subunits	4,005	16,095	51.5
		Totals	7,501	31,239	100.0
2006	Fairbanks - Central Tanana	20A	1,051	3,729	11.7
	Matanuska Susitna Valley	14A	531	3,318	10.4
	Fairbanks - Central Tanana	20B	790	3,247	10.2
	Kenai	15C	237	1,383	4.3
	Nelchina - Upper Susitna	13B	173	1,217	3.8
	Nelchina - Upper Susitna	13A	225	1,164	3.6
	Kenai	15A	133	1,126	3.5
	Remainder of State	78 Subunits	4,222	16,774	52.5
		Totals	7,362	31,958	100.0
2005	Fairbanks - Central Tanana	20A	1,132	4,236	13.1
	Matanuska Susitna Valley	14A	542	3,171	9.8
	Fairbanks - Central Tanana	20B	600	2,818	8.7
	Kenai	15C	307	1,406	4.3
	Nelchina - Upper Susitna	13B	149	1,157	3.6
	Kenai	15A	124	1,081	3.3
	McGrath	19A	176	1,024	3.2
	Remainder of State	77 Subunits	4,393	17,539	54.1
		Totals	7,423	32,432	100.0

[a] Source: ADF&G, undated.

7.3.1 Methodology

Impacts are analyzed according to potential construction and operation-related impacts and their direct and indirect effects. Potential impacts on subsistence are evaluated by measuring changes in the following variables: use areas, user access, resource availability, and competition. Appendix I summarizes baseline data for all four variables by study community.

7.3.2 Common Impacts

Subsistence resource uses in and near the project area would be affected similarly by the construction of the proposed rail extension regardless of the route that could be authorized. Subsistence use and harvest studies conducted in the study communities indicate use of this region both in residents' lifetimes and in the last 10 to 20 years. While regulation of subsistence uses for resource management or military purposes may reduce or limit the use of these lands, residents from a number of communities reported using these lands to harvest subsistence resources. The use of the project area relative to each community's overall use areas is low; however, as noted above, subsistence use area data are not available for some communities located near or in the project area (*e.g.*, Delta Junction and Salcha).

Subsistence use impacts include direct effects on user access to those use areas, including traplines, and resource availability in those areas. If the rail line is constructed and ARRC's regulation barring public access along and across the rail line was implemented, the project would create a linear barrier preventing free range of hunters across the area. The proposed rail line could also impact the movement of some wildlife. This would be especially acute in areas west of the Tanana River, which subsistence users from the east generally access by traveling across the river. Chapter 5, Biological Resources, provides additional information on wildlife and migration in the area.

If a community does not harvest resources in or near the project area or use resources that move or migrate through the area, then that community's user access and resource availability would not be directly affected. However, even if a community does not use or harvest resources from the project area, competition could be directly affected because changes in access to the area created by the rail line could cause harvesters to begin using other communities' use areas, subsequently increasing the number of harvesters competing for resources in those places. Any direct effects on user access or resource availability would have the greatest chance of affecting Delta Junction, Healy Lake, Nenana, Salcha, and Tok subsistence users because of their greater level of subsistence use overlap documented in the project area. Direct effects stemming from changes to user access and resource availability would least affect the remaining study communities (Cantwell, Dry Creek, Dot Lake, Minto, Northway, Tanacross, and Tetlin). Although Cantwell, Dot Lake, and Minto show moose harvests in minor drainages that overlap the project area, these numbers are relatively low and there would be less potential for a direct effect on their subsistence uses.

7.3.3 Construction Impacts

Construction-related activities resulting from the development of the NRE would have direct effects on subsistence use areas, user access, resource availability, and competition, particularly for Delta Junction, Healy Lake, Nenana, Salcha, and Tok because those communities have greater documented uses in the NRE. These impacts would occur for the duration of the construction activity and primarily in the area where the construction was occurring.

Traditional but undocumented uses by subsistence users living along the proposed rail line and using roads/trails or the river system to access harvest areas could be affected if harvest activities take place at the same time and location as construction-related activities and no alternative use areas are available or adequate to the harvesters.

Construction activities would likely limit user access to existing trails and portions of the river. Subsistence users may be temporarily blocked from certain waterways stemming from construction of bridges and construction in the right-of-way (ROW) over existing trails or traplines. Timing certain construction activities to occur during the winter, especially activities related to bridge construction and in the ROW where access would be temporarily blocked, could help mitigate this effect as travel is less restricted during the winter months. Increased noise and activity in the project area arising from construction activities could deflect resources away from use areas, resulting in a decrease in resource availability and corresponding increase in competition for remaining resources. Construction activity could also deflect subsistence species towards Richardson Highway or farther from the river, in turn increasing competition or decreasing availability of those species. Impacts to resident and anadromous fish resources resulting from construction of the NRE, including loss of riparian and stream habitat and potential blockage of fish movements, could decrease the availability of these fish species to harvesters both within the project area and to communities on the Tanana and Yukon rivers located downstream of the project area.

Indirect effects on Healy Lake residents' lifetime harvest areas located in the project area could occur as a result of construction activities. This could lead to a sense of loss and intrusion by outsiders into their traditional harvest areas. However, the recent Healy Lake subsistence use area has a relatively small overlap with the project area. Decreased access to use areas arising from construction would result in indirect effects such as potential increased costs and risks incurred in traveling to less familiar and more distant hunting and fishing areas. Additional indirect effects could include increased hunter effort resulting from a decrease in resource availability and an increase in competition if resources are deflected away from their traditional harvest areas at the usual time and place of harvest. Construction occurring in use areas could also lead to user avoidance of the area, causing them to hunt or harvest resources elsewhere.

7.3.4 Operations Impacts

Operations-related impacts resulting from the development of the NRE would have direct effects on subsistence use areas, user access, resource availability, and competition, especially for those communities with uses that overlap the project area (Delta Junction, Healy Lake, Salcha, Nenana, and Tok). The cleared rail line would represent new access points to some areas and would redirect travel routes for subsistence users and wildlife that would likely follow the corridor. Such use of the rail line as a conduit, when combined with restrictions on crossing the rails, would impact subsistence use patterns in the region.

Unless an individual acquires a permit to cross the proposed NRE rail line at locations other than authorized crossing points, ARRC regulations barring public access across the rail line would block user access to harvest areas, including traplines. This regulation would have a direct effect on subsistence use of the areas by reducing access. These effects would be particularly restrictive in areas west of the Tanana River, including Salcha Alternative Segment 1, the Central and Donnelly alternative segments, and the South Common Segment. Although grade crossings at public and private roads and trails would maintain existing access along established routes, user access to other areas across the rail line would be eliminated. Thorough identification of existing trails and routes, as well as installation of grade crossings at these locations, could help mitigate reduced access by providing users multiple crossing points to reach their use areas. The fewer the number of crossings installed along the rail line, the greater the direct effect of reduced access to use areas.

The project's vegetation-free ROW could result in moose and other mammals traveling along and crossing the rail line. This could result in more train-moose collisions, and potentially affect overall moose resource availability in the area. ARRC regulations prohibit access to rail ROW; however, the cleared rail ROW could make areas more accessible to unauthorized four wheelers and snow machines. This could, in turn, increase moose harvest success and reduce the amount of time needed to harvest moose. It is likely that competition among subsistence users in and near the ROW would, in turn, decrease due to these access restrictions. User access and competition for subsistence resources in the ROW would be further decreased if the military no longer constructs ice bridges in the winter. It is not expected that the Tanana River Bridge would result in an increased number of subsistence users accessing areas west of the Tanana River because access across the bridge would be controlled for military and rail purposes only.

Noise from rail line operations could deflect resources and/or harvesters from the area. This could reduce users' connection to traditional use areas.

Indirect effects to subsistence users resulting from rail line operations could include increased costs and increased risks. The reduced access to harvest areas because of the rail line could potentially increase harvesters' costs and risks should they have to hunt in less familiar or more distant use areas. As with construction-related impacts, indirect effects to Healy Lake residents could occur as a result of the intrusion of rail line operation-related activities in traditional use areas.

Increased activity resulting from rail line operations in the area could cause user avoidance of traditional harvest areas due to perceptions of being observed, perceptions of adverse effects on the quality of resources due to contamination or exposure to humans, and hunter feelings of being excluded or denied access by authority figures. Communities hunting or harvesting resources in the project vicinity have numerous alternative harvest areas potentially available to them; however, certain locations in the project area could have traditional and historic associations with certain communities and harvesters. Those areas could be preferred by harvesters because of familiarity based on long-time use of the area patterned by culturally based rules of land use, tenure, and association.

7.3.5 No-Action Alternative

Under the No-Action Alternative, the NRE would not be constructed and there would be no impacts on subsistence uses. As a result, the existing conditions pertaining to subsistence use areas, user access, resource availability, and competition described in Section 7.2, Affected Environment, would stay the same.