

## On the Andrus d-2 Plan

When the Interior Department unveiled the Carter Administration's plan for subsistence protection in new national parks, forests and wildlife refuges carved out of the National Interest (d-2) Lands, we had hoped to find that the federal government had taken a strong initiative to protect subsistence hunting and fishing by Alaska Natives. Our hopes rose when Secretary Cecil Andrus made his presentation before the Congressional subcommittee which is currently presiding over the debate on the future of Alaska's unclassified federal land. Andrus seemed to recognize the critical importance of fish and wildlife to the Native people of Alaska. We had some reason to believe that the Administration would present specific legislative language that would give the concept of subsistence hunting and fishing a strong legal backbone.

However, when three Interior officials returned to Capitol Hill a week later to spell out more specifically what their d-2 stance was, some of the spine had been removed.

From the standpoint of managing wildlife resources and dividing them among competing users, urban and rural or Native and non-Native, the Interior d-2 position is depressing because it so firmly recognizes the right of the State of Alaska to manage fish and wildlife. We could, of course, contrive a burst of optimism and say that maybe the management performance of the state where subsistence resources is concerned will improve in the near future. Given the record of the Department of Fish and Game, such optimism would be irresponsible and unwarranted. We feel skepticism is in order **until the department begins to show dramatic signs of improvement in making and carrying out subsistence management policy.**

The support of Interior for the concept of state game management is nowhere more dramatically stated than in the Administration's proposed amendment to the Udall bill numbered "SEC. 701. (a)" which begins with the obscure declaration that "...the State of Alaska is authorized to permit subsistence uses of fish and wildlife, and plant resources..."

**AUTHORIZED TO PERMIT?** Brother, it sounds as if the state may, or may not, permit you to continue subsistence hunting and fishing. The fact that there is some language in the Andrus plan that suggests that the state must adhere to federal standards of subsistence management offers little comfort considering the past subsistence performance of the state and the relative weakness of federal standards themselves.

Actually, the first sign of Administration timidity came when Interior said it objected to legislative language that would commit Congress to protecting the culture of Alaska Natives. Interior fears that making such a commitment might increase the responsibility of the federal government to promote the welfare of Indians and Alaska Natives. Although the federal trust responsibility to Native people is under attack in some parts of the Lower 48, it is a concept that has been long and well recognized. The land claims act passed in 1971 in no way terminated the trust responsibility in Alaska. The language proposed in the Udall d-2 bill that would commit Congress to Native cultural protection is really a restatement of an already accepted legal principle and a confirmation of the intent of Congress in the land claims act to protect subsistence.

It is especially discouraging that Interior wants to cut the cultural preservation language out of the d-2 legislation. To do so leaves subsistence hunting and fishing stranded in the straight jacket of economic need and human survival. Subsistence, even in the golden age of resource exploitation and over-production and consumption, is more than a way of putting meat on the table of rural Alaskans. Subsistence is a way of living based on local, seasonal exploitation of renewable resources using simplified methods of technology. It is a way of living even today tied to religious beliefs and specialized social organizations that have been evolving for centuries. The Interior plan fails to recognize this side of subsistence.

One of the most serious faults of Interior's plan is that it fails to establish any mechanism for local people to participate in making subsistence policy for new parks and refuges and delegates villagers to the role of advisors in carrying out management policy. In a state where local consciousness is very high, this is a serious blow. And considering the need that federal land managers will have for accurate LOCAL information on wildlife habits, distribution and habitat, relegating local experts to advisory capacities is a slight to the rich bank of knowledge stored in the minds of Alaska's rural hunters and fishermen. They deserve a greater role in recognition of their dependence on and knowledge of subsistence resources.

The Carter Administration plan for the protection of subsistence through d-2 legislation is disappointing, but it is by no means the

end of the road. It is the first crack that President Carter and Secretary Andrus have had at a very complex issue. We offer our remarks in the context of objectivity and in the hopes that Native Alaskans will not hesitate to broaden the Administration's understanding of an old way of life.

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