

WP26–74 Executive Summary

General Description	WP26-74 requests that the Board recognize the customary and traditional uses of sheep in Unit 12 by residents of Chitina and Kenny Lake.
Proposed Regulation	<p><i>Customary and Traditional Use Determination— Sheep</i></p> <p><i>Unit 12</i></p> <p><i>Residents of Unit 12, Chistochina, Chitina, Dot Lake, Healy Lake, Kenny Lake, Mentasta Lake, and</i></p>
OSM Preliminary Conclusion	Oppose
Southcentral Alaska Subsistence Regional Advisory Council Recommendation	
Eastern Interior Alaska Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	<p>1 Oppose</p> <p>See Written Public Comments on Wildlife Proposals and Closure Reviews section of the meeting book or www.doi.gov/subsistence/wildlife/public_comments for full comments.</p>

Draft Customary and Traditional Use Analysis WP26-74

ISSUE

Wildlife Proposal WP26-74, submitted by Bruce Gordon of Chitina, AK, requests that the Federal Subsistence Board (Board) recognize the customary and traditional uses of sheep in Unit 12 by residents of Chitina and Kenny Lake.

Proponent Statement

The proponent states that he and other residents of Kenny Lake and Chitina have a history of harvesting sheep in Unit 12. The proponent previously resided in Kenny Lake and now lives in Chitina, and he explained that residents of both communities have historically adapted their hunting locations based on the changing availability of wildlife in the region. He states, “if you are dependent on harvesting animals, you have to go where they are located.” Residents of the region have also had to change their hunting locations because of intense hunting competition on the road system. The proponent states that since the 1970s he has hunted where he was most likely to obtain a permit under State opportunity, and that was often in Units 11 and 12 for sheep, moose, and caribou. He notes that guides dominated sheep hunting closer to Chitina.

The proponent states that he and his hunting partner raised their large families through subsistence and provided subsistence food for local community members. He and his son have hunted together as well. He worries that young people in the region will not be able to have the hunting opportunities that were open to his generation. He would like to be able to participate in the Federal subsistence elder sheep hunt in Unit 12 in an area in which he, his family, and hunting partner have a history of use. Many of his hunts have been on foot, and he would like to continue this practice. With the caribou population down, other opportunities are vital, but older individuals such as the proponent are unable to harvest moose, and sheep are an important alternative.

Much of this information, including the exact proposal request was not included in the submitted proposal, but clarified through follow-up conversations with the proponent.

Current Federal Regulations

Customary and Traditional Use Determination—Sheep

Unit 12

*Residents of Unit 12, Chistochina,
Dot Lake, Healy Lake, Mentasta
Lake, and Slana*

Proposed Federal Regulations

Customary and Traditional Use Determination—Sheep

Unit 12

Residents of Unit 12, Chistochina, Chitina, Dot Lake, Healy Lake, Kenny Lake, Mentasta Lake, and Slana

Extent of Federal Public Lands

Unit 12 is comprised of approximately 61% Federal public lands that consist of 49% National Park Service (NPS), 11% U.S. Fish and Wildlife Service (USFWS), and 1% Bureau of Land Management (BLM) managed lands.

Regulatory History

At the beginning of the Federal Subsistence Management Program in Alaska in 1992, the Board adopted a customary and traditional use determination of “no subsistence priority” for sheep in the Tok Management Area of Unit 12, and no rural residents were eligible to hunt sheep under Federal subsistence regulations. In the remainder of Unit 12, the Board did not adopt a customary and traditional use determination, so all rural residents were eligible to harvest sheep under Federal regulations (72 FR 22961, May 29, 1992).

In 1997, the Board received many proposals requesting changes to customary and traditional use determinations for sheep in Units 11, 12, and 13. Proposal P97-25c requested that the Board recognize the customary and traditional use of sheep in Unit 12 remainder by residents of Chistochina and Mentasta. The Board adopted the proposal with modification, creating a single customary and traditional use determination area in Unit 12 and adopting the Southcentral Alaska Subsistence Regional Advisory Council (Southcentral Council) recommendation to include rural residents of Unit 12, Chistochina, and Mentasta Lake as eligible to harvest sheep in the unit (62 FR 45723, August 29, 1997).

In 1998, the Healy Lake Traditional Council submitted Proposal P98-100 seeking to add Healy Lake to the customary and traditional use determination for sheep in Unit 12. The Eastern Interior Alaska Subsistence Regional Advisory Council (Eastern Interior Council) and Southcentral Council supported the proposal with modification to add rural residents of adjacent Units 11, 12, 13C, 20D, and 20E. The Board adopted the proposal with modification to add residents of Dot Lake and Healy Lake only. The Board said that there was insufficient evidence available during its deliberations to support including other rural residents. The Board clarified that rural residents of the community of Dot Lake would include rural residents of the village of Dot Lake and Dot Lake Junction (OSM 1998, 7; 63 FR 35338, June 29, 1998).

In 2020, the Board adopted Proposal WP20-51 to add Slana to the customary and traditional use determination for sheep in Unit 12. In doing so, it deferred to the recommendations of both the Eastern Interior and Southcentral Councils.

Background

Residents of Chitina and Kenny Lake already have a customary and traditional use determination for sheep in Unit 11. This means they are qualified to hunt sheep on Federal public lands in Unit 11 under Federal subsistence regulations. Additionally, there is a Federal sheep hunt in the portion of Unit 13D that excludes 13D, the Tok Management Area, and the Delta Controlled Use Area. There has not been a customary and traditional use determination for sheep in this area, and all rural residents are eligible. Within Unit 12, residents of Chitina and Kenny Lake are federally qualified to hunt moose in Unit 12 remainder, and wolf throughout the unit. Additionally, they can also participate in Federal hunts for other species that are open to all rural residents in Unit 12.

Eligibility requirements pertaining to national parks and monuments are subject to additional rules. Only people living within a national park or monument, people living in resident zone communities and those households holding subsistence use permits issued under 36 CFR 13.440 can hunt in national parks and monuments. However, communities must have a customary and traditional use determination for a given species in the area *and* be resident zone communities for residents to be eligible to hunt that species in national parks and monuments.

The resident zone communities for Wrangell-St. Elias National Park are: Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway/Northway Village/Northway Junction, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and Yakutat.

As shown above, Chitina and Kenny Lake are already resident zone communities for Wrangell-St. Elias National Park, a portion of which is located in the southern part of Unit 12. Because residents of Chitina and Kenny Lake meet both resident zone and customary and traditional use determination criteria for the national park lands in Unit 11, they can already hunt sheep on those lands. If the Board recognizes their customary and traditional use for sheep in Unit 12, they would also be able to hunt sheep in the portion of the park in Unit 12.

Currently residents of Chitina and Kenny Lake can hunt for sheep in Unit 12 under State regulations. Within the Tok Management Area, which includes the northern portion of Unit 12, they can harvest one ram with full-curl or larger every four regulatory years by drawing permit (DS102) from August 10 to September 20. In Unit 12 remainder, they can harvest one ram with full-curl horn or larger per regulatory year, by harvest ticket August 10 to September 20. There is also a youth hunt with the same bag limit in Unit 12 remainder, which runs from August 1 to August 5. There is no State subsistence hunt for sheep in Unit 12, as the State has made a negative finding for customary and traditional uses of sheep in Unit 12, that portion within the

Community Characteristics

The communities of Chitina and Kenny Lake fall within the traditional territory of the Ahtna Athabascans (de Laguna and McClellan 1981). Present-day Unit 12 overlaps with the upper Tanana region, populated historically by speakers of Tanacross and Upper Tanana Athabascan languages (McKenna 1981, Haynes and Simeone 2007), with whom the Ahtna have historically maintained ties based on reciprocity and kinship (Reckord 1983, Haynes and Simeone 2007).

Chitina

Chitina is located on the west bank of the Copper River near its confluence with the Chitina River, around mile 34 of the Edgerton Highway (La Vine and Zimpelman 2014). The community is located in Unit 13D, close to the boundary with Unit 11. The Chitina CDP also includes the Strelina area, which is across the Copper River in Unit 11. The important Lower Ahtna Athabascan settlement of Taral was located near this area, as were additional Ahtna camps, but Chitina itself developed around copper mining at Kennecott, and was connected to Cordova by railroad (La Vine and Zimpelman 2014). Chitina's population declined after the Kennecott Mine was closed, but has subsequently grown slowly over time (La Vine and Zimpelman 2014). In 2024, the estimated population of Chitina was 109 (ADLWD 2024).

Kenny Lake

Kenny Lake and Willow Creek are separate, adjacent census designated places (CDPs), but they are considered to be a single community, following ADF&G, Division of Subsistence (La Vine and Zimpelman 2014). Kenny Lake is located along the Edgerton Highway and parts of the Richardson and Old Edgerton highways, while Willow Creek "includes the roads just south of the junction of the Richardson and Old Edgerton highways then north towards Copper Center" (La Vine and Zimpelman 2014). Kenny Lake/Willow Creek is located in Unit 13D and across the Copper River from Unit 11.

Kenny Lake/Willow Creek is located in the Lower Ahtna area, near its boundary with the Central Ahtna area to the north (Simeone 2006). Ahtna settlements existed in this area, but the contemporary community of Kenny Lake was settled by homesteaders beginning in the 1950s (La Vine and Zimpelman 2014). Willow Creek CDP was established in 2000 and incorporated portions of the previous Kenny Lake CDP as well as part of the area bordering the Copper Center CDP (La Vine and Zimpelman 2014). In 2022, the estimated population of Kenny Lake CDP was 319, and the estimated population of Willow Creek CDP was 196, for a combined population of 515 (ADLWD 2024).

Eight Factors for Determining Customary and Traditional Use

A community or area's customary and traditional use is generally exemplified through these eight factors: (1) a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area; (2) a pattern of use recurring in specific seasons for many years; (3) a pattern of use consisting of methods and means of harvest which are characterized by efficiency and economy of effort and cost, conditioned by local characteristics; (4) the consistent harvest and use of fish or

wildlife as related to past methods and means of taking: near, or reasonably accessible from the community or area; (5) a means of handling, preparing, preserving, and storing fish or wildlife which has been traditionally used by past generations, including consideration of alteration of past practices due to recent technological advances, where appropriate; (6) a pattern of use which includes the handing down of knowledge of fishing and hunting skills, values, and lore from generation to generation; (7) a pattern of use in which the harvest is shared or distributed within a definable community of persons; and (8) a pattern of use which relates to reliance upon a wide diversity of fish and wildlife resources of the area and which provides substantial cultural, economic, social, and nutritional elements to the community or area.

The Board makes customary and traditional use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)). In addition, the Board takes into consideration the reports and recommendations of any appropriate Regional Advisory Council regarding customary and traditional use of subsistence resources (50 CFR 100.16(b) and 36 CFR 242.16(b)). The Board makes customary and traditional use determinations for the sole purpose of recognizing the pool of users who generally exhibit some or all of the eight factors. The Board does not use such determinations for resource management or restricting harvest. If a conservation concern exists for a particular population, the Board addresses that concern through the imposition of harvest limits or season restrictions rather than by limiting the customary and traditional use finding.

In 2010, the Secretary of the Interior asked the Board to review, with Regional Advisory Council input, the customary and traditional use determination process, and present recommendations for regulatory changes. In June 2016, the Board clarified that the eight-factor analysis applied when considering customary and traditional use determinations is intended to protect subsistence use, rather than limit it. The Board stated that the goal of the customary and traditional use determination analysis process is to recognize customary and traditional uses in the most inclusive manner possible.

Traditionally, sheep were an important and valued part of the Ahtna diet and were particularly important during periods of starvation (Reckord 1983, Simeone 2006). At the beginning of the 20th century, written and oral history indicates that the Lower Ahtna living in areas overlapping with present-day Chitina and Kenny Lake were often unable to obtain moose and caribou, and depended heavily on sheep, which were plentiful in the region (Simeone 2006). According to Simeone (2006), “In the recollection of many elders sheep were almost more important than any other resources except salmon” (42).

The Ahtna hunted for sheep and goats in the mountains simultaneously. In 2008, a Southcentral Council member recalled:

Speaking to that, I would like to mention that when I first came to the valley, I used to visit with one of the older Native ladies in Chitina, and she talked about [hunting] in fall. In fall they headed up to the mountains to hunt sheep and goats simultaneously together. And they lived on sheep and goats up in the mountain until the snow drove them back down.

The Ahtna not only relied upon sheep but actively stewarded them through practices such as burning vegetation to increase new growth and food for the animals, as was reported by Katie John (Simeone 2006). In hunting any animal, skill was only one component of success. Following the proper behaviors and rituals both before and after taking an animal were equally important (de Laguna and McClellan 1981). Sheep were harvested in late summer and fall using bow and arrow, or caught using drag-pole snares set in stone fences (de Laguna and McClellan 1981, Simeone 2006). Sheep and other animals were cooked by stone-boiling in spruce bark baskets or by roasting on a spit, with men usually doing the cooking (de Laguna and McClellan 1981). Boiled strips of sheep meat were eaten slightly aged (Simeone 2006).

The Ahtna harvested sheep within their traditional territory, in areas relatively close to their camps and settlements, on the slopes of the Wrangell Mountains or the Alaska Range (de Laguna and McClellan 1981). Several Elders who grew up in the Lower Ahtna region in the 1920s and 1930s shared their families' hunting areas (Simeone 2006). Wayla Hobson, from the Chitina area, said that in the 1920s, her family was unable to find moose or caribou, and hunted for sheep in the mountains. Families in the area hunted sheep "up the Kotsina River to where the Kluesna River comes in" (Simeone 2006: 27). People living at the traditional settlement of Taral, near present-day Chitina hunted up Canyon Creek and into the Hanagita Valley (Simeone 2006).

Etta Bell grew up in the Kenny Lake area. She "recalled that when she was young her family hunted the Chetaslina, Cheshnina, and Chichokna rivers for black bear, moose, and Dall sheep" (Simeone 2006: 28). She said that her family needed about 14 sheep and 2 moose each year (Simeone 2006). Margaret Eskilida grew up on the east bank of the Copper River opposite the mouth of the Tonsina River, between present-day Chitina and Kenny Lake. She remembered that there "were hardly any moose and only a few caribou so that people had to live off sheep meat, which they hunted on the Dadina and Nadina rivers. Her family also hunted sheep in the vicinity of Strelina" (Simeone 2006: 28). All of the areas described above by Lower Ahtna are in Unit 11.

Ahtna Elder Wilson Justin reported that when miners arrived in the Copper River valley, a commercial meat hunting industry developed to feed them, drawing heavily on sheep populations in the Wrangell Mountains (Simeone 2006: 16). Reckord reports that the impact of miners on the local sheep population from 1910 to the 1930s also brought new rules and limits on sheep hunting that applied not just to the miners, but to local families dependent on subsistence, interrupting their use (1983).

In the 1960s, according to Wilson Justin, commercial guiding began to push sheep into more marginal terrain that could support fewer sheep. He observed that since the 1970s, the State's growing population has increased hunting pressure, and sheep have moved into more inaccessible areas (Simeone 2006), a theme echoed by Reckord (1983). Overall, those Ahtna elders interviewed by Simeone reported that sheep populations had declined significantly over time (Simeone 2006). Although Chitina residents had depended heavily on sheep in the past, by the early 1980s, they were hunted far less often (Reckord 1983).

Regulatory regimes have been equally disruptive to the local relationship to sheep. According to Reckord (1983), in the late 1970s and early 1980s, the short mid-summer season contributed to a general reluctance to hunt sheep among residents of Chitina, because it was difficult to transport the meat back to the community before it spoiled. Additionally,

The game laws that allow only one animal...to be taken also discourage the subsistence usage of sheep. Much effort would have to be invested in the hunt and the rewards would be too small to make sheep hunting a worthwhile subsistence endeavor. The game laws regarding sheep, more than any other species, discourage subsistence use of the species” (Reckord 1983: 89).

An assessment of the eight factors includes consideration of documented use of the resource by communities in the proposal: in this case, use of sheep in the proposal area by residents of Chitina and Kenny Lake. ADF&G, Division of Subsistence periodically surveys communities for their subsistence uses during a single year. These surveys seek to capture all subsistence harvest of fish and wildlife during the survey year under any opportunity, State or Federal.

Chitina has been comprehensively surveyed three times (Stratton and Georgette 1984, McMillan and Cuccarese 1988, La Vine and Zimpelman 2014). Reckord’s 1983 study of subsistence in Wrangell-St. Elias National Park and Preserve also contributes to the literature on Chitina’s use of sheep, covering the late 1970s to the early 1980s. In 2012, the most recent subsistence survey study year, residents of Chitina harvested an estimated 246 pounds of wild resources per person¹ (La Vine and Zimpelman 2014, ADF&G 2024). Surveyed households harvested an average of eight resources, and used an average of ten resources (La Vine and Zimpelman 2014). The most important species in terms of edible weight were salmon, caribou, and moose (ADF&G 2024).

Surveyed Chitina households did not harvest sheep in any of the three survey years (ADF&G 2025). However, an average of about 8% of surveyed households attempted to harvest sheep across the three survey years (ADF&G 2025). Surveyed Chitina households were documented to have received sheep meat from others in 1987 and 2012, and an average of 11% of households used sheep meat across all three survey years (ADF&G 2025).

Reckord reported that in the late 1970s and early 1980s the upper Kotsina in Unit 11 was the most popular spot for sheep hunting by residents of Chitina, who also looked for sheep in the mountains immediately west of the community in Unit 13 (1983). In 2012, documented sheep search areas for surveyed Chitina households included a small area in Unit 13D close to Chitina and in the Crystalline Hills area along the Chitina McCarthy Road in Unit 11 (La Vine and Zimpelman 2014).

Kenny Lake has also been surveyed comprehensively three times, and is also included in Reckord’s study (Reckord 1983, Stratton and Georgette 1984, McMillan and Cuccarese 1988, La Vine and Zimpelman 2014). However, the way in which the community has been defined, and whether this

¹ About 85% of Chitina households were surveyed for that year. The survey included the Strelina area (La Vine and Zimpelman 2014).

definition included the area now within Willow Creek, has changed over time (Stratton and Georgette 1984, La Vine and Zimpelman 2014). The most recent subsistence survey results discussed here represent harvest for both the Kenny Lake and Willow Creek CDPs, which ADF&G Division of Subsistence considered to comprise a single community.

In 2012, the most recent survey year, Kenny Lake/Willow Creek residents harvested an estimated 141 pounds of wild food per person, and surveyed households harvested an average of seven resources and used an average of ten resources² (La Vine and Zimpelman 2014, ADF&G 2024). Salmon, moose, caribou, and halibut were the most important resources in terms of edible weight harvested (ADF&G 2024).

Like Chitina, surveyed households in Kenny Lake did not harvest sheep in any of the three survey years (ADF&G 2025). Hunting effort was documented in 2012, when about 5% of surveyed households attempted to hunt sheep (ADF&G 2025). In 2012, about 6% of surveyed Kenny Lake households used sheep, having received it from others (ADF&G 2025). In the early 1970s and 1980s, Kenny Lake residents hunted for sheep “high in the mountains south of the Tonsina River,” and in the Chugach mountains, sometimes traveling by road and plane to hunt sheep at more distant locations (Reckord 1983). In 2012, surveyed Kenny Lake/Willow Creek households searched for sheep in a small area around Mankomen Lake in Unit 13C (La Vine and Zimpelman 2014). In 2012, residents of Kenny Lake/Willow Creek both received and gave away sheep meat, and about 6% of households used it (ADF&G 2025).

Because the general season Federal sheep hunts in Unit 11 and 12 do not require a Federal permit, harvest reporting takes place using a State harvest ticket. However, State harvest data were not available at the time this analysis went to print. Since the early 2000s, Federal subsistence regulations have provided a sheep harvest opportunity for people 60 years of age and older in both Units 11 and 12, which has a longer season than the general season hunt. (This is the subsistence elder sheep hunt referred to by the proponent in the Proponent Statement section.) In Unit 11, the elder sheep hunt harvest limit is one sheep, and in Unit 12 the elder sheep hunt harvest limit is one ram with full curl horn or larger. Although residents of Kenny Lake/Willow Creek and Chitina are not eligible for the hunt in Unit 12, a few eligible residents of these communities have applied for and hunted using the Unit 11 elder sheep permit each year, although only one harvest was reported by a Kenny Lake resident in the 15 years from 2010 to 2024 (**Tables 1, 2**).

² Thirty-eight percent of Kenny Lake/Willow Creek households were surveyed in 2012 as part of a random sample (La Vine and Zimpelman 2014).

Table 1. Unit 11 Elder Sheep Permits (FS1104) issued to residents of Chitina 2010 to 2024 (Federal Subsistence Permit Database 2025).

Year	Issued	Hunted	Harvested
2010	1	1	0
2011	2	1	0
2012	3	0	0
2013	1	1	0
2014	1	1	0
2015	2	1	0
2016	3	2	0
2017	2	1	0
2018	2	2	0
2019	1	1	0
2020	3	1	0
2021	3	1	0
2022	2	1	0
2023	2	2	0
2024	5	0	0
Total:	33	16	0

Table 2. Unit 11 Elder Sheep Permits (FS1104) issued to residents of Kenny Lake/Willow Creek 2010 to 2024 (Federal Subsistence Permit Database 2025).

Year	Issued	Hunted	Harvested
2010	3	2	0
2011	3	3	0
2012	3	2	0
2013	1	0	0
2014	3	2	0
2015	2	2	0
2016	2	1	0
2017	1	1	0
2018	1	0	0
2019	0	0	0
2020	2	0	0
2021	1	0	0
2022	1	0	0
2023	0	0	0
2024	4	1	1
Total:	27	14	1

Discussion and Effects

If this proposal is adopted, residents of Chitina and Kenny Lake will have their customary and traditional uses of sheep in Unit 12 recognized. They will become qualified to harvest sheep under Federal subsistence regulations on Federal public lands in Unit 12, which includes an elder hunt. Because Chitina and Kenny Lake are already resident zone communities for Wrangell-St. Elias National Park, they would be able to harvest sheep within the portion of Unit 12 within Wrangell-St. Elias National Park. If this proposal is rejected, residents of Chitina and Kenny Lake can continue to hunt for sheep in Unit 12 under State regulations. Additionally, they can continue to hunt for sheep under Federal subsistence regulations in Unit 11, where they are already federally qualified.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP26-74.

Justification

Traditionally, sheep were an important and valued part of the Ahtna diet, particularly during times when other ungulates were unavailable. The Ahtna harvested sheep within their traditional territory, in areas relatively close to their camps and settlements. Increased population and hunting pressure, restrictive regulations, and commercial guiding have all contributed towards interrupting traditional patterns of sheep use in the region.

Over three subsistence surveys between 1982 and 2012, participating Chitina and Kenny Lake households were not found to have harvested any sheep, although hunting effort was documented, and households received sheep from others, and used it. Surveyed households in both communities searched for sheep relatively close to home, although residents of Kenny Lake also searched for sheep in unspecified more distant locations. No search and use areas for sheep were specifically documented in Unit 12 for Chitina or Kenny Lake in the subsistence studies. While Chitina and Kenny Lake have a demonstrated pattern of customary and traditional hunting for sheep, this pattern has not been demonstrated for Unit 12.

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WRITTEN PUBLIC COMMENTS

Ahtna Intertribal Resource Commission