

FP27–06 Executive Summary	
General Description	Fisheries Proposal FP27-06 requests that the Federal Subsistence Board recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River District by residents who live along McCarthy Road to Dan Creek and Kennicott. <i>Submitted by: Wrangell-St. Elias National Park Subsistence Resource Commission</i>
Proposed Regulation	Customary and Traditional Use Determination – Salmon <i>Prince William Sound Area – Chitina Subdistrict of the Upper Copper River District</i> <i>Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road, and along the McCarthy Road to Dan Creek and Kennicott.</i>
OSM Preliminary Conclusion	Support Proposal FP26-07 with modification to clarify that the determination not only includes residents along the road “to Dan Creek and Kennicott,” but also includes residents of May Creek, Dan Creek, and Kennicott.
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	2 oppose

DRAFT CUSTOMARY AND TRADITIONAL USE ANALYSIS

FP27-06

ISSUE

Fisheries Proposal FP27-06, submitted by the Wrangell-St. Elias National Park Subsistence Resource Commission (WRST SRC), requests that the Federal Subsistence Board (Board) recognize the customary and traditional use of salmon in the Chitina Subdistrict of the Upper Copper River District by residents who live along McCarthy Road to Dan Creek and Kennicott¹.

Proponent Statement

The proponent states that while the Board has recognized the customary and traditional use of salmon by residents of Chitina and McCarthy in the Chitina Subdistrict, the status of those living along McCarthy Road to Dan Creek and Kennecott is unclear, causing confusion for residents and field managers. There is a considerable distance between the Census Designated Places (CDPs) of Chitina and McCarthy. Communities along McCarthy Road include Strelna, Chokosna, and Long Lake. Additionally, the proponent states that Dan Creek and Kennecott are located outside the McCarthy CDP (but see **Map 2** below). The proponent requests that the Board clarify the situation by formally recognizing the customary and traditional use of salmon in the Chitina Subdistrict by residents of McCarthy Road in regulation. According to the proponent, these residents have long fished in the Chitina Subdistrict, as these waters are close to where they live.

Current Federal Regulations

Customary and Traditional Use Determination—Salmon

PRINCE WILLIAM SOUND AREA

Chitina Subdistrict of the Upper Copper River District

Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road.

¹ While the original spelling, “Kennicott” applies to natural features, such as Kennicott Glacier and Kennicott River, as well as to Kennicott Road, an erroneous spelling, “Kennicott” was applied to the mine and mining town during and after mining operations. However, many authors have more recently used “Kennicott” to apply to the mining town area as well (Kluh 1996).

Proposed Federal Regulations

Customary and Traditional Use Determination—Salmon

PRINCE WILLIAM SOUND AREA

Chitina Subdistrict of the Upper Copper River District

*Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road, **and along the McCarthy Road to Dan Creek and Kennecott.***

Extent of Federal Public Lands

For purposes of this discussion, the phrase “Federal public waters” is defined as those waters described under 36 CFR 242.3 and 43 CFR 51.3. The area affected by this proposal is the Federal public waters of the Chitina Subdistrict of the Upper Copper River District within and adjacent to the exterior boundaries of Wrangell-St. Elias National Park and Preserve (See [Prince William Sound Area Map](#) in the Federal Subsistence Fish and Shellfish Management Regulations Booklet).

The Upper Copper River District is composed of the Chitina and Glennallen Subdistricts. The subdistricts are geographically defined in the same way in Federal and State regulation. The Chitina Subdistrict consists of all waters of the mainstem Copper River downstream of the downstream edge of the Chitina-McCarthy Road Bridge to an east-west line crossing the Copper River approximately 200 yards upstream of Haley Creek, as designated by Alaska Department of Fish and Game (ADF&G) regulatory markers, a distance of approximately ten miles (**Map 1**). The Glennallen Subdistrict consists of all waters of the mainstem Copper River from the mouth of the Slana River downstream to the downstream edge of the Chitina-McCarthy Road Bridge, a distance of approximately 120 miles.

Regulatory History

In 1992, the Federal Subsistence Management Program promulgated regulations governing the harvest of fish for subsistence uses in non-navigable waters within and adjacent to Federal public lands (57 Fed. Reg. 22940 [May 29, 1992]). In 1999, the Board also adopted Federal regulations for fish in navigable waters within and adjacent to Federal public lands where there is a Federal reserved water right (64 Fed. Reg. 1276 [January 8, 1999]).

In 1999 the Federal Subsistence Management Program adopted State subsistence fishery regulations, including those for the Copper River. At that time, the State classified the Chitina Subdistrict as a personal use fishery (it continues to be classified this way today in 2026). The Federal regulations did not initially include a customary and traditional use determination for salmon specific to the Chitina Subdistrict; the Chitina Subdistrict is geographically within what was then called the “Copper River District—remainder” (i.e., the area outside of the Glennallen Subdistrict), for which a customary and traditional use determination was established for residents of the Prince William Sound Area ([64 Fed. Reg. 1309 \[January 8, 1999\]](#)). Therefore, the new Federal regulations prohibited the take of salmon in the Chitina Subdistrict. The 1999 regulations also established a customary and traditional use determination for the Glennallen Subdistrict for all residents of the Prince William Sound Area. The regulatory history of the Glennallen Subdistrict is not detailed further here because it is outside the scope of this proposal.

Over the next six years, the Board created a customary and traditional use determination specific to salmon in the Chitina Subdistrict, authorized a Federal subsistence fishery in the Chitina Subdistrict, and then incrementally added communities to the customary and traditional use determination. During this time the Board also rejected requests to add two communities to the determination, Delta Junction and Lake Louise. Details of the regulatory history for the customary and traditional use determination for salmon in the Chitina Subdistrict between 2000 and 2006 are given below.

As of 2000, the Federal subsistence regulations still stated that taking salmon from the Chitina Subdistrict was prohibited ([65 Fed. Reg. 5210 \[February 2, 2000\]](#)). In 2000, Copper River Native Association submitted Fisheries Proposal FP01-15, which requested that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict for residents of Chitina, Cantwell, Chistochina, Copper Center, Gakona, Gulkana, Mentasta, and Tazlina. The proponent stated that the request was not intended to exclude other, potentially qualified communities (OSM 2000). During analysis of FP01-15, all communities in the Prince William Sound Area were considered. However, the Eastern Interior Alaska and the Southcentral Alaska Subsistence Regional Advisory Councils (the Eastern Interior and the Southcentral Councils) supported the proposal as written, and the Board recognized the customary and traditional uses of the eight Ahtna communities only, including Chitina, but not McCarthy or residents along the McCarthy Road. While a customary and traditional use determination for Chitina Subdistrict was established with FP01-15, a Federal fishery for the Chitina Subdistrict was not established until the Board adopted Fisheries Proposal FP02-17b, which went into effect in 2002.

In 2001, the Board adopted Fisheries Proposal FP02-16, submitted by WRST SRC, to add the remaining communities in the resident zone of the Wrangell-St. Elias National Park (Chisana, Dot Lake, Gakona Junction, Glennallen, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Nabesna, Northway, Slana, Tanacross, Tetlin, Tok, Tonsina, and those individuals living along the Tok cutoff from Tok to Mentasta Pass, and along the Nabesna Road) to the customary and traditional use determination for salmon in the Chitina Subdistrict (OSM 2001). This proposal was supported by the Southcentral Council. Communities along McCarthy Road or the roads to Dan Creek and Kennicott were not separately considered in the analysis, general information on patterns of harvest and resource sharing were cited from studies that considered the McCarthy Road, Dan Creek, and Kennicott areas collectively. Also in 2001, the Board adopted FP02-17b, which established seasons, harvest limits, and methods and means for the take of salmon the Chitina Subdistrict.

Both Chitina and McCarthy have had a customary and traditional use determination for the Chitina Subdistrict for approximately 25 years. Transcripts of the Board deliberation of FP02-16, which included McCarthy, indicate that the Board intended to include residents living on roads between the communities named in the customary and traditional use determination for the Chitina Subdistrict. During discussion, the Chair of the Southcentral Council asked the NPS Board member the following question:

Does that proposal as you put it, does that—when we included these communities like Chitina and McCarthy and Kenny Lake, we just took for granted that the people that were on the road systems between these communities were part of the communities or were included in it. And when you say the resident zone communities, does that include the individuals that are outside of the communities but between the communities also? (FSB 2001:16).

In response, the Board member representing NPS stated “Yes it does” (FSB 2001: 16). The Board voted to adopt FP02-16 shortly after this exchange.

In 2002, the Board rejected Fisheries Proposals FP03-11 and FP03-13 to add residents of Delta Junction and Lake Louise, respectively, to the customary and traditional use determinations for salmon in the Chitina Subdistrict. The proposals were analyzed together, and OSM’s analysis included many other communities and areas. The analysis presented harvest data from communities with versus without a customary and traditional use determination for salmon in the Chitina Subdistrict. Notably, McCarthy Road (defined as from the Copper River bridge at Chitina to Mile 62 on the McCarthy Road) was included among the communities *with* a determination. In other words, OSM considered McCarthy Road residents to be included in the existing customary and traditional use determination for salmon in the Chitina Subdistrict. Kennicott, Dan Creek, and May Creek were not included in these analyses, so it is not possible to determine if OSM considered these communities to be part of McCarthy or otherwise included in the determination at that point in time. Both the Southcentral and the Eastern Interior Councils opposed adding Lake Louise, Delta Junction, or the additional communities considered by OSM due to lack of substantial evidence for long-term dependence on the resource. The proposals were rejected through the consensus agenda.

In 2003, the Board adopted Fisheries Proposal FP04-19, submitted by the ADF&G Paxson Fish and Game Advisory Committee, which requested that the residents of the Paxson-Sourdough area be added to the customary and traditional use determination for salmon in the Chitina Subdistrict. This addition was supported by the Southcentral Council. Of note, Paxson and Sourdough had previously been analyzed along with many other communities in FP03-11/13, when the Board declined to add them to the customary and traditional use determination.

In 2005, the Board adopted FP05-14, submitted by Chickaloon Village Traditional Council, which requested that Chickaloon be added to the Chitina Subdistrict customary and traditional use determination for salmon. This addition was supported by the Southcentral Council. Of note, Chickaloon had previously been analyzed along with many other communities in FP03-11/13, when the Board declined to add it to the customary and traditional use determination. No changes have been made to the customary and traditional use determination for salmon in the Chitina Subdistrict since 2005.

In 2023 and 2025, the Board rejected several proposals to add additional communities and areas to the customary and traditional use determination for salmon in the Chitina Subdistrict. In 2023, the Board rejected FP23-14, submitted by residents of Serendipity subdivision, requesting the addition of residents of the Serendipity subdivision (located near the confluence of the Tiekell and Tsina rivers in the Copper River Basin) to the customary and traditional use determination for salmon in the Chitina Subdistrict of the Upper Copper River District. The Board rejected FP23-14 in deference to the Southcentral Council, which felt that the residents of the Serendipity subdivision did not fully demonstrate the criteria necessary to be recognized for customary and traditional use of salmon in the Chitina Subdistrict, particularly with regard to a long-term patterns of use (development of the Serendipity subdivision began in 2000). The Council wanted to see additional research conducted into the community. They also noted that none of the community members spoke in support of their proposal at the Council meeting, although this is not a requirement.

Also in 2023, the Board rejected FP23-15/16, submitted by the ADF&G Upper Tanana/Fortymile Advisory Committee, which requested that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict by permanent rural residents who live between the named communities along the Alaska Highway from the U.S./Canada border to Dot Lake. This proposal is relevant to consideration of McCarthy Road because it also dealt with residents on the road between communities that already have an established customary and traditional use determination, although further removed from the Chitina Subdistrict. The Board rejected FP23-15/16 in deference to the Southcentral and Eastern Interior Councils and due to lack of proximity or substantial evidence for a long-term pattern of use and sharing of the resource.

In 2025, the Board rejected FP25-03a, submitted by the Tolsona Community Corporation, which requested that the Board recognize the customary and traditional use of salmon in the Chitina Subdistrict by residents of Tolsona. This was consistent with the recommendations of the Southcentral and Eastern Interior Councils. The Board stated that there was limited information available on

Tolsona's use of salmon in the subdistrict, and there was no evidence for passing down fishing knowledge and practices from generation to generation.

Background

History of State Management of the Chitina Subdistrict

After statehood in 1959, the State of Alaska began to regulate seasons, open areas, harvest limits, gear types, and eligibility for the Copper River subsistence fishery (Simeone 2010). Beginning in 1964, the Alaska Board of Fish and Game limited subsistence fishing to the Copper River mainstem, closing traditional Ahtna fishing sites on the river's tributaries. From their introduction in 1910 to the early 1960s, fishwheels were the predominant gear used in the Copper River, but as early as the late 1960s, urban residents began to fish with dip nets just below the town of Chitina (Simeone 2010). This was an area traditionally used by the Ahtna, and over time, the Ahtna were pushed out of what is now the Chitina Subdistrict (Fall and Simeone 2010).

In 1977 the State created the Chitina and Glennallen Subdistricts, and in 1979 the subdistricts were differentiated by gear type; only fish wheels could be used in the Glennallen Subdistrict, and for conservation purposes, only dip nets could be used in the Chitina Subdistrict (Fall and Simeone 2010). In 1984, the Board authorized a personal use fishery at Chitina for non-rural Alaskans, distinguishing it from subsistence fishing in the Glennallen Subdistrict for rural Alaskans. Dip nets were again allowed in the Glennallen Subdistrict (Fall and Simeone 2010). However, in 1990, both subdistricts were again open to all Alaskans under State regulations (Simeone 2010). Between 1999 and 2003, the Alaska Board of Fisheries temporarily supported a positive State customary and traditional use determination for salmon in the Chitina Subdistrict, which as a result became a subsistence fishery for that brief time (Fall and Simeone 2010).

State and Federal Fishing Regulations in the Upper Copper River District

Federal subsistence fishing regulations are more liberal than State regulations in both subdistricts in terms of permitted gear, season length, and ability to harvest from both subdistricts in a single year (**Table 1**). State regulations allow subsistence fishing in the Glennallen Subdistrict, but not in the Chitina Subdistrict. The Chitina Subdistrict is designated as a State personal use fishery. The Chitina Subdistrict is not within a State nonsubsistence area, but Alaska Board of Fisheries has made a negative customary and traditional use finding for the Chitina Subdistrict (Fall and Simeone 2010).

Under State regulations, permits can only be issued to a household for either the Glennallen Subdistrict subsistence fishery or the Chitina Subdistrict personal use fishery in any given year, but not for both subdistricts. Fish wheels and dip nets are allowed in the Glennallen Subdistrict, but a household may not use both in the same year. Only dip nets are allowed in the Chitina Subdistrict under State regulations (**Table 1**).

Currently, Federal regulations for the Upper Copper River District (both the Chitina and Glennallen subdistricts) require users to have a subsistence fishing permit and allow the use of fish wheel, dip net, and rod and reel gear for the take of salmon. Households of federally qualified subsistence users who live in communities that have a customary and traditional use determination for both subdistricts may be issued both permits (**Table 1**).

Federal subsistence harvest limits are more liberal than State personal use harvest limits in the Chitina Subdistrict but are similar to State subsistence harvest limits in the Glennallen Subdistrict (**Table 2**). In the Chitina Subdistrict, becoming federally qualified means that fishers could transition from a State personal use limit of 25 salmon for the head of the household, plus ten salmon for each additional household member, to a Federal subsistence limit of 30 salmon for a single person household (with an option to request permits for up to 200 total salmon), or 60 salmon for a household of two or more (with an option to request permits for up to 500 total salmon) (**Table 2**). Additionally, while those fishing under State regulations in the Chitina Subdistrict may only keep one Chinook Salmon, federally qualified subsistence users may keep up to five Chinook Salmon caught by dip net and five caught by rod and reel (**Table 2**). There are no limits, other than the overall salmon limit, on how many Chinook Salmon may be retained when federally qualified subsistence users harvest with a fish wheel. Fish wheels were historically used in the Chitina Subdistrict but were prohibited by the State beginning in 1979; since 2002, Federal regulations have permitted the use of fish wheels in the Chitina Subdistrict (Fall and Simeone 2010). However, they are not commonly used in this area under Federal regulations (OSM 2026).

Table 1. Comparison of State and Federal salmon fishing regulations for gear, permitting, and season length for the Chitina and Glennallen Subdistricts.

Jurisdiction	Gear permitted	Permit	Season
State: Chitina Subdistrict (Personal Use)	Dip net	Required (\$15); permits can only be issued for either the Chitina Subdistrict or the Glennallen Subdistrict in a given year. A sport fishing license is also required unless the resident is under 18.	Opens no earlier than June 10 and goes through September 30 only during periods established by emergency order. King (Chinook) Salmon may not be taken until after June 30.
State: Glennallen Subdistrict (Subsistence)	Fish wheel or dip net, but not both	Required; permits can only be issued for either the Chitina Subdistrict or the Glennallen Subdistrict in a given year.	June. 1—Sept. 30
Federal: Subsistence (both subdistricts)	Fish wheel, dip net, and rod and reel gear	Required; permits can be issued in both subdistricts in the same year.	May 15—Sept. 30

Table 2. Comparison of State and Federal salmon fishing harvest limits for the Chitina and Glennallen subdistricts.

Jurisdiction	One-person Household Limit	Household of Two or More Persons Household Limit
State: Chitina Subdistrict (Personal Use)	25 salmon for the head of household and ten salmon for each additional household member. As a portion of the limit, the annual limit for King (Chinook) salmon is one per household. King (Chinook) Salmon may not be kept until after June 30 and retention may be closed at any time.	
State: Glennallen Subdistrict (Subsistence)	30 salmon, of which no more than five may be Chinook Salmon if taken by dip net. Upon request, permits for additional salmon will be issued for up to 200 salmon total, of which no more than five may be Chinook Salmon if taken by dip net.	60 salmon, of which no more than five may be Chinook Salmon if taken by dip net. For a household of more than two, ten salmon for each additional person may be added to the annual limit. The number of Chinook Salmon (five) taken by dip net does not increase. Upon request, permits for additional salmon will be issued for up to 500 salmon total, of which no more than five may be Chinook salmon if taken by dip net.
Federal: Subsistence (both subdistricts)	30 salmon (including no more than five Chinook by dip net and five Chinook by rod and reel). Upon request, permits for additional salmon will be issued for up to 200 salmon total (Chinook limit does not change).	60 salmon (including no more than five Chinook by dip net and five Chinook by rod and reel), plus ten salmon for each additional person in a household over two persons, except that the household's limit of Chinook Salmon taken by dip net or rod and reel does not increase. Upon request, permits for additional salmon will be issued for up to 500 salmon total (Chinook limit does not change).

Existing Customary and Traditional Use Determinations for McCarthy Road

McCarthy Road already has a customary and traditional use determination for salmon in the Glennallen Subdistrict, as do all residents of the Prince William Sound Area. This is also the case for the “remainder” of the Prince William Sound Area, where all residents of the Prince William Sound Area have a customary and traditional use determination.

As residents of the Prince William Sound area, McCarthy Road residents have a customary and traditional use determination for freshwater fish, including Rainbow Trout, Arctic Char, whitefish, Arctic Grayling, sucker, and Burbot in the Prince William Sound Area, *except for the Copper River drainage upstream of Haley Creek*. Chitina and McCarthy also have a customary and traditional use determination for this area. However, Chitina and McCarthy additionally have a customary and traditional use determination for freshwater fish in the waters of the Copper River drainage upstream from Haley Creek, whereas residents of McCarthy Road are not listed in this determination.

Similarly, in the Gulkana National Wild and Scenic River, McCarthy and Chitina are listed as having a customary and traditional use determination for freshwater fish, but McCarthy Road residents are not. McCarthy Road is included in many customary and traditional use determinations for wildlife in Unit 11 and 13D, which border the Chitina Subdistrict. These are included in **Appendix I**.

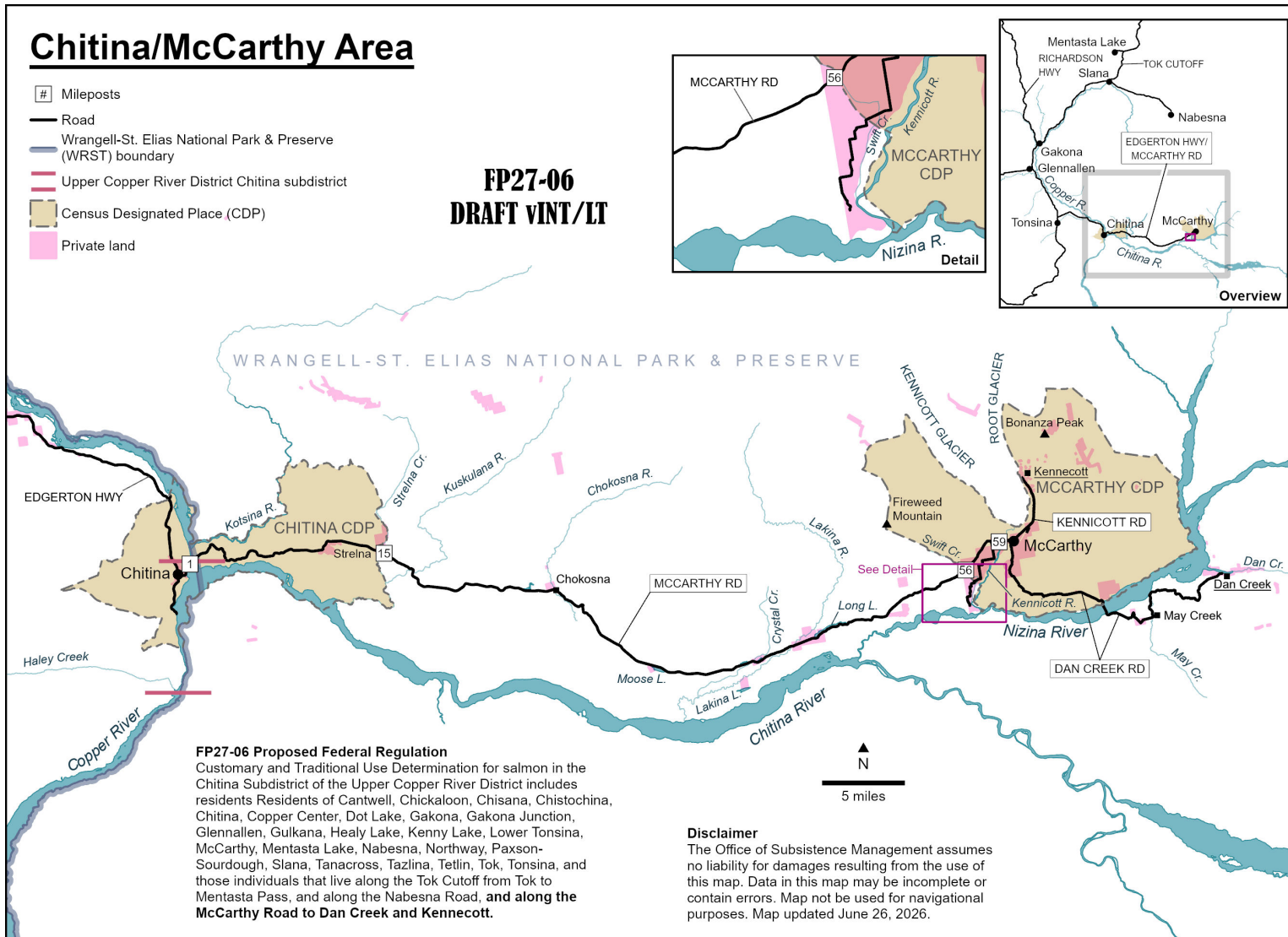
Portions of the Proposal Area Within Chitina and McCarthy Census Designated Places

McCarthy and Chitina already have customary and traditional use determinations for salmon in the Chitina Subdistrict. The Board rarely defines the boundaries of communities with customary and traditional use determinations in regulation. Customary and traditional use determinations that name communities may be interpreted by OSM and field managers to apply to the CDPs associated with these communities, where they exist. Alternatively, these determinations may be based on wider or narrower boundaries identified by ADF&G's Division of Subsistence as encompassing a cohesive community. Identifying a boundary for communities named in customary and traditional use determinations is especially useful when residential areas blend together on the road system. When the Board made its customary and traditional use determinations for Chitina and McCarthy for salmon in the Chitina Subdistrict, it did not define these communities by their CDPs, or in any other way, in regulation.

The proponent has asked the Board to clarify whether McCarthy Road to Dan Creek and Kennecott should already be considered to have a customary and traditional use determination for salmon in the Chitina Subdistrict, or to formally add these areas to the determination. The Southcentral and Eastern Interior Councils and the Board may want to consider that the first fifteen miles of McCarthy Road are within Chitina CDP and the last three miles of the road are within McCarthy CDP (**Map 2**).

Additionally, OSM GIS analysis demonstrates that Kennicott Road, including the old Kennecott Mine, is entirely within the McCarthy CDP (**Map 2**). Further, a portion of Dan Creek Road north of the Nizina River is also within the McCarthy CDP, though the smaller communities of May Creek and Dan Creek are located along that portion of the Dan Creek Road outside the CDP boundaries (**Map 2**).

The Board may choose to consider the entirety of McCarthy Road, Nizina/Dan Creek Road, including May Creek and Dan Creek, and Kennicott Road including Kennicott, based on the content of this analysis. Areas in the request that lie outside of Chitina and McCarthy CDPs include approximately 41 miles of the McCarthy Road (starting at milepost 15 and ending at milepost 56) and approximately 12 miles of Dan Creek Road (also known as Nizina Road), beginning on the north bank of the Nizina River, running through May Creek, ending at Dan Creek (**Map 2**).



Map 2. Boundaries of Chitina and McCarthy CDPs and proposed areas of the McCarthy Road CDP to be explicitly included in customary and traditional use determination for salmon in the Chitina subdistrict

Community Characteristics

McCarthy Road connects the communities of Chitina and McCarthy, following the northern bank of the Chitina River and the southern foot of the Wrangell Mountains east of the Copper River (Reckord 1983, Stratton and Georgette 1984). The road branches off the Edgerton Highway, and runs for 59 miles, most of which passes through Wrangell-St. Elias National Park and Preserve (Buzzell 2005, **Map 2**). As noted by the proponent, homesteads form small clusters of residences at places including Strelina, Chokosna, and Long Lake (Reckord 1983). Additionally, this proposal includes residents along the Kennicott Road, which runs from McCarthy to Kennecott Mines, and Dan Creek Road, which runs from McCarthy to Dan Creek.

McCarthy Road is gravel and is notoriously rough (Stratton and Georgette 1984, Jacobs 2024). It takes about 2.5 hours to drive from Chitina to the Kennicott River adjacent to McCarthy, and the road is not maintained in winter, often limiting travel to snowmachine (Reckord 1986, ADOT&PF 2026). There is no public automobile access across the Kennicott River to McCarthy, or across the Nizina River along Dan Creek Road. At the end of public automobile access on McCarthy Road, Kennicott River can be crossed by a small bridge on foot or by ATV (Jacobs 2024). The bridge replaced a hand-operated tram that was used to cross the Kennicott River until 1997. Kennicott Road stretches five miles to the north of McCarthy, and the old road to May Creek and Dan Creek extends southeast of McCarthy.

The Copper River Basin, including the Chitina Valley and McCarthy Road area, is the traditional homeland of the Ahtna people (Allen 1885, de Laguna and McClellan 1981, Buzzell 2005, Simeone and Miller 2024). The Chitina Valley was utilized on a seasonal basis by a band of Lower Ahtna who located their winter village at Taral, near the confluence of the Chitina and Copper Rivers. The Taral band under the leadership of Chief Nicolai in the late 19th century utilized both sides of the Chitina River including the drainages of the Tana, Nizina, and Chitistone Rivers, tributaries of the Chitina River near its headwaters (Allen 1885, de Laguna and McClellan 1981). A traditional trail system ran through the area, part of which paralleled the rail line that was eventually constructed along the Chitina River, and which is now McCarthy Road (Buzzell 2005).

Because McCarthy Road runs through Chitina and McCarthy CDPs, and because these two communities already have a customary and traditional use determination for salmon in the Chitina Subdistrict, information about their characteristics is included here. McCarthy Road (separate from Chitina or McCarthy) has never been included in any U.S. Census, and there is limited information on current or historical population for the portion of the road outside these two CDPs (a total of 41 miles), although it is likely that population trends have followed those of McCarthy proper (see **Table 3**).

In 1900, prospectors located an extremely rich source of copper ore on Bonanza Ridge, which would become the Kennecott Mines, and gold was also discovered in the area (Buzzell 2005). The Lower Ahtna had long known about and utilized these deposits. According to La Vine and Zimpelman, “Lower Ahtna assisted prospectors at a time when they were experiencing difficulty finding food due to increased competition for resources in the area, which caused them to seek opportunities to assist

and guide many prospectors in exchange for food and supplies” (2014:142). The Chitina River drainage subsequently experienced a mining and population boom (Jacobs 2024).

McCarthy was homesteaded in 1906 and officially established in 1912 (La Vine and Zimpelman 2014). Chitina and Kennecott Mines and camp were established in 1908 (NPS NDa, DCRA 2026). McCarthy Road was initially the Chitina branch of the Copper River and Northwestern Railway, which connected Cordova to Chitina, McCarthy, and the Kennecott Mines, and was completed in 1911 (Gilbert et al. 2001, Jacobs 2024). Construction of the railroad and associated mining activity led to the growth of Chitina, McCarthy, and Kennecott, as well as settlements near Strelina Creek, Crystal Creek, Long Lake, and scattered homestead sites throughout the area (Buzzell 2005). During operation, Kennecott had a population of about 500, and McCarthy had a population of about 600; many other people lived along the railroad line itself (Reckord 1983, Kluh 1996). Dan Creek copper mine operated between 1911 and 1930, and gold mining also occurred on lower Dan Creek (Stratton and Georgette 1984). The Dan Creek Road passes through the May Creek area, where mining also occurred in the early part of the century (Stratton and Georgette 1984).

Although miners and their families supplemented their diets with local wildlife and gardens, they relied heavily on imported foods, a very different strategy than that of the Ahtna (Cronon 1992, Gilbert et al. 2001). In his environmental history of Kennecott Mines, William Cronon observed, “in the Copper River valley a human population that depended almost entirely on the local landscape was invaded by a population that depended virtually not at all on that landscape” (1992: 44).

Kennecott Mines closed and the railroad ceased operation in 1938 (Gilbert et al. 2001). The population of the Chitina Valley declined rapidly after the closure of the mine, leaving only about fifteen families in the entire area (Gilbert et al. 2001, Buzzell 2005). There was no bridge access across the Copper River connecting Chitina to McCarthy Road between 1939 and 1971, although a hand-operated tram was built across the Copper River at Chitina during World War II, and a Chitina resident operated a ferry in the years after the mine closed (NPS NDb, Gilbert et al. 2001, Kizzia 2021). Locals continued to use the rail line as a tramway and winter sled trail until the 1960s (Buzzell 2005). An air strip at May Creek, along Dan Creek Road, was used beginning in the 1950s (Buzzell 2005). Dan Creek and May Creek had been connected to McCarthy by road in the early 1920s, but the bridge over the Nizina River experienced frequent failures, with the last washout occurring in the early 1970s. Since that time, access has been by plane, or by snowmachine in winter (Stratton and Georgette 1984).

According to the U.S. Census, Chitina reached a population low of 31 in 1960 before beginning to slowly grow again (DCRA 2026, **Figure 3**). McCarthy and McCarthy Road started to be slowly resettled in the 1950s by new homesteaders who relied on air travel; some of these residents were oriented towards Cordova, where they often travelled and sometimes spent part of the year (Reckord 1983, Stratton and Georgette 1984, Buzzell 2005, Kizzia 2021). According to Olson and Shaine (2005):

Through the ‘50s into the ‘70s, about a half dozen people lived in McCarthy. Another handful lived in the cabins and houses remaining on the outlying mining claims, at places like the

Green Butte on McCarthy Creek, Long Lake, May Creek, Dan Creek across the Nizina River, and in the depths of the Chitistone Canyon.

McCarthy Lodge was established in the 1950s, facilitating limited tourism (Gilbert et al, 2001). The old rail line was converted to a road in the 1960s and the bridge across the Copper River was rebuilt in 1971, improving access to McCarthy Road (NPS NDb, Buzzell 2005).

Although the population of McCarthy was not censused from 1950 until 1980, local history indicates that there were a few residents of the area during this time (Kizzia 2021, DCRA 2026). These new settlers of McCarthy and McCarthy Road came seeking a subsistence lifestyle (Reckord 1983, Brewster 2018). According to Reckord, while the railroad and the possibility of supplying food and goods to residents initially attracted settlers to the region, as of the early 1980s, none of the residents of the McCarthy Road area were descended from the first wave of miners and settlers (Reckord 1983). Employment was virtually absent on the McCarthy Road during the late 1970s and early 1980s, necessitating a seasonal residence pattern for some (Reckord 1983, Stratton and Georgette 1984). Placer gold mining at Dan Creek resumed in the 1980s (Stratton and Georgette 1984). Wrangell-St. Elias National Park and Preserve was created in 1980 (Gilbert et al. 2001). Between 1983 and 1988, the mean time spent in cash employment each year by household heads had doubled (MacMillan and Cuccarese 1988).

Chitina CDP was officially established in 1980, and McCarthy CDP was officially established in 1990 (U.S. Census Bureau 1982, 1991)². However, population records for the two areas go back to 1910 (DCRA 2026, **Figure 3**). McCarthy's population has increased steadily since 2010, while Chitina has experienced a slight decline during the same time period (**Figure 3**). In 2025, McCarthy CDP had an estimated population of 125, and Chitina CDP had an estimated population of 97 (ADLWD 2026). There is no CDP for McCarthy Road, which, like Chitina and McCarthy, is located within the Copper River Census Area.

² In 2000, both the Chitina and McCarthy CDPs lost and gained some territory (U.S. Census Bureau 2000).

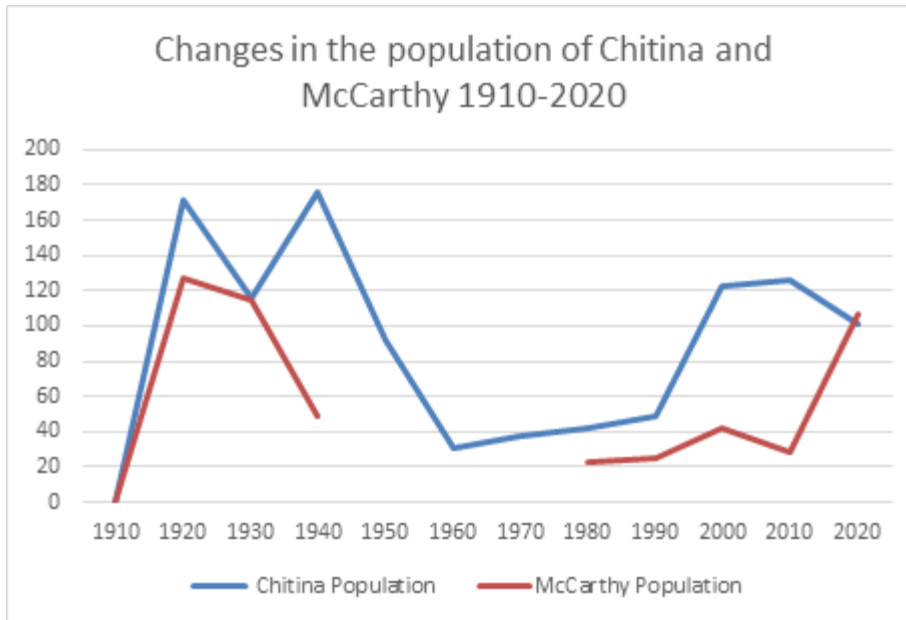


Figure 3. Changes in the population of Chitina and McCarthy from 1910 to 2020, based on data from the U.S. Census Bureau (DCRA 2026). McCarthy was not censused in 1950, 1960, or 1970 (DCRA 2026). Census data are not available for McCarthy Road.

Population estimates for McCarthy Road, Dan Creek Road, and Kennicott Road

McCarthy Road connects the communities of Chitina and McCarthy. Dan Creek Road travels south and southeast from McCarthy and is intercepted by the Nizina River, subsequently running through May Creek before ending at Dan Creek. Kennicott Road runs five miles north from McCarthy (**Map 2**). None of these areas have ever been officially censused, although it is very likely that some residents of these areas have been included in counts of the McCarthy population. However, population estimates from previous subsistence studies provide some insights on population changes and residency in these areas (**Table 3**).

In the late 1970s to early 1980s, Reckord (1983) observed “50 or 60 residents scattered among approximately 15 family homesteads” along McCarthy Road, some of which were used seasonally (1983: 232). In places, she observed clusters of residences along McCarthy Road, as at Long Lake and Strelina (Reckord 1983). At the same time, she described McCarthy itself as having both year-round and seasonal residents, stating that “at least 25 people (but probably as many as 30 to 40 people) lived in the town and many passed through it for extended stays” (Reckord 1983: 211). May Creek and Dan Creek were included in Reckford’s (1983) “Upper Nizina” sampling area. The author estimated that there were 5 to 6 families, or 10 to 12 residents in the Upper Nizina area overall (Reckord 1983). She also included a sample that combined Kennicott and McCarthy, noting that many lots had recently been created and sold near the old mine, and tourism was developing. Some properties were being developed seasonally only at that time. Reckord did not give a population estimate specific to Kennicott alone (Reckord 1983).

In 1982, Stratton and Georgette (1984) documented “18 year-round households...clustered in small groups along the McCarthy Road at such places as Silver Lake (Mile 11), Strelna (Mile 14), Chokosna (Mile 26), and Long Lake (Mile 45),” with a total population estimated at 52 (Stratton and Georgette 1984: 118). The mean length of residency for surveyed McCarthy Road residents in the Copper River Basin was 13.7 years, with some residents originating in the homesteading era of the 1950s and 1960s (Stratton and Georgette 1984). During the same study, the mean length of residency in the Copper River Basin for residents of Copper Center was 33 years (Stratton and Georgette 1984).

In this same study, Kennicott, McCarthy, Dan Creek, and May Creek were included in a “South Wrangell Mountain” sampling area. Researchers identified three year-round households in the Dan Creek area at that time (Stratton and Georgette 1984). They also identified one resident of May Creek (Stratton and Georgette 1984: 126). Of 12 permanent McCarthy households, “four households lived at the end of McCarthy Road on the west side of the Kennicott River, while the remaining households lived across the river in Kennicott, McCarthy, or along McCarthy Creek” (Stratton and Georgette 1984: 127).

In 1987, researchers identified 19 permanent McCarthy Road households and 38 residents (McMillan and Cuccarese 1988). About 6% of residents had been born in the Copper River Basin, and 6% of household heads or their spouses had been lifelong residents of the basin (McMillan and Cuccarese 1988). For comparison, during the same year, the researchers found that 37% of residents in Copper Center had been born in the Copper River Basin, and 34% of household heads or their spouses were lifelong residents (McMillan and Cuccarese 1988). McCarthy-Kennecott, May Creek, and Dan Creek were considered collectively as part of the “South Park” sample (McMillan and Cuccarese 1988). Researchers estimated there were 23 permanent households and 48 residents in this area but did not distinguish which of these households resided along the Dan Creek or Kennicott Roads (McMillan and Cuccarese 1988). This 1987 to 1988 South Park sample is also labelled “South Wrangell Mountains” in ADF&G’s Community Subsistence Information System (CSIS).

For the 2012 study year, La Vine and Zimpleman (2014) defined the “McCarthy” survey area as including McCarthy, Kennicott, Dan Creek, May Creek, and McCarthy Road as far west as Crystal Creek (milepost 40). This survey area was determined based on consultation with community residents, who shared that the census estimation for the McCarthy CDP excluded “a substantial number of households and individuals residing in the wider McCarthy area” (La Vine and Zimpleman 2014: 147). The westernmost surveyed households in McCarthy were located at approximately milepost 42 of McCarthy Road, the northernmost households were in Kennicott on the east side of Kennicott River, and the southeasternmost households were along the Nizina River and Dan Creek south of McCarthy (La Vine and Zimpleman 2014). The “Chitina” survey area also included a portion of McCarthy Road as far east as Strelna Creek (La Vine and Zimpleman 2014). Because this survey estimated population for the McCarthy and Chitina survey areas as a whole, it is not possible to discern a population estimate specifically for McCarthy Road, Dan Creek Road, or Kennicott Road. The survey estimated 103 people resided in the McCarthy area (La Vine and Zimpleman 2014).

Other population estimates for McCarthy Road are not readily available, but a 2024 report for the Federal Highway Administration estimated that there were (at a minimum) approximately 13 year-round households living along McCarthy Road, with recreational cabins also present (Jacobs 2024). Some residents were seasonal, and the population increased during the summer (Jacobs 2024). Based on “anecdotal accounts,” Jacobs estimated that there were about six year-round families in the Strelna area (MP9—15), five year-round families at Chokosna (MP27), and two year-round families at Lakina River/Long Lake (MP45) (Jacobs 2024). Jacobs also reported that there were “a handful of residents who live year-round” in Kennicott (2024: 8-4).

Because some of these population estimates were conducted informally, with methods varying from study to study, they cannot be used to demonstrate any trends in the McCarthy Road, Dan Creek Road, or Kennicott Road populations over time. However, they do provide evidence that at multiple points over time since at least the 1970s, year-round residents have been present in these areas. Local knowledge indicates that this presence of post-Kennecott Mine settlers goes back to the 1950s (Kizzia 2021). Additionally, the degree to which McCarthy Road, Kennicott, Dan Creek, and May Creek have been included as part of McCarthy (and in one instance, Chitina) underlines continuity between residents of these areas. This continuity is echoed by the Wrangell-St. Elias National Park SRC, which considers residents living between Chitina and McCarthy as members of resident zone communities and therefore eligible to harvest under Federal subsistence regulations within National Park Service lands (Cohen 2026, pers. comm.). Notably, however, resident zone status is not required to fish for salmon under Federal subsistence regulations in the Chitina Subdistrict.

Table 3. Studies and surveys that have included residents along McCarthy Road, Dan Creek Road, and/or Kennicott Road. Dashed lines indicate no estimates were provided.

Source	Study Period	Sample Name	Communities / Areas Included	Estimated Population	Estimated Households
Reckord 1983	Late 1970s to early 1980s	“Upper Nizina”	Nizina River Valley, including Dan Creek and May Creek	10-12	5-6
		“McCarthy-Kennecott”	McCarthy and Kennicott	25 – 40 in McCarthy	-
		“McCarthy Road”	The road between Chitina and McCarthy, including Long Lake and Strelna	50 – 60	15, some seasonal
Stratton and Georgette 1984	1982 to 1983	“South Wrangell Mountains”	Kennicott, McCarthy, Dan Creek, and May Creek	32	16 year-round
		“McCarthy Road”	60-mile stretch of McCarthy Road, including the	52	18 year-round

Source	Study Period	Sample Name	Communities / Areas Included	Estimated Population	Estimated Households
			Chitina-McCarthy Bridge		
McMillan and Cuccarese 1988	1987 to 1988	“South Park,” / “South Wrangell Mountains”	McCarthy-Kennecott, Dan Creek, and May Creek	48	23 year-round
		“McCarthy Road”	Copper River bridge to mile 62 of the McCarthy Road	38	19 year-round
La Vine and Zimpleman 2012	2012	“McCarthy”	Kennicott, McCarthy, Dan Creek, and May Creek, as well as homesteads along McCarthy Road as far west as Cystal Creek	103	58
		“Chitina”	Chitina and areas east along the McCarthy Road to Strelna Creek	134	54
Jacobs 2024	2023 - 2024	“McCarthy Road”	Strelna, Silver Lake, Chokosna, Lakina River / Long Lake (approximately milepost 5 – 45 of McCarthy Road)	-	13 year-round

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 (43 CFR 51.16(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 (43 CFR 51.16(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.

The subsistence practices of the communities that currently possess a customary and traditional use determination for salmon in the Chitina Subdistrict reflect the traditions of the Ahtna, Upper Tanana, and Tanacross, as well as those of Euro-American settlers and homesteaders. These communities possess numerous interpersonal connections and have a history of sharing subsistence resources, practices, and knowledge. These customary and traditional practices have been well-documented in previous proposal analyses for the Chitina Subdistrict (FP01-15, FP02-16) (OSM 2000, OSM 2001).

In late spring to summer, Ahtna moved from winter settlements to seasonal salmon camps, where they caught and processed salmon, a practice which continues today (Buzzell 2005, Simeone and Miller 2024). Fishing focused on the Copper River as well as nearby tributaries and lakes (Buzzell 2005, Simeone and Miller 2024). Sockeye and Chinook were the most important salmon species, and were harvested with funnel traps, dip nets, and hook and line (Buzzell 2006, Simeone and Miller 2024). The salmon were cut thinly and dried (Buzzell 2005). The Ahtna widely adopted the fish wheel starting in 1910 (de Laguna and McClellan 1981).

Subsistence Studies and Surveys Conducted for the Proposal Area

Holly Reckord's important work on subsistence in the Wrangell-St. Elias National Park and Preserve, based on research in the late 1970s and early 1980s, included information about McCarthy Road, in addition to Chitina, McCarthy-Kennecott, and the Upper Nizina, which included May Creek and Dan Creek (Reckord 1983, **Table 3**). Reckord did not conduct a quantitative survey of subsistence uses by these residents, but her ethnographic work provides important context for the analysis.

McCarthy Road area was also the subject of two comprehensive subsistence surveys in the 1980s, one conducted by ADF&G Division of Subsistence (Stratton and Georgette 1984) and one by a separate entity in partnership with ADF&G's Division of Subsistence (McMillan and Cuccarese 1984). In the first survey, for June 1982 through May 1983, 13 of 18 year-round McCarthy Road households were surveyed (Stratton and Georgette 1988). Additionally, 15 of the 16 year-round households identified in the South Wrangell sample were surveyed (Stratton and Georgette 1984). However, because this sample combined results for McCarthy, Kennicott, May Creek, and Dan Creek (**Table 3**), results cannot be separated for the individual communities.

In the second subsistence survey, for June 1987 through May 1988, 17 of 19 McCarthy Road households were surveyed (McMillan and Cuccarese 1988). Additionally, 14 of the 23 households in the "South Park" sample were surveyed (McMillan and Cuccarese 1988, **Table 3**). As with the 1982 to 1983 study, for this South Park sample, results for Kennicott, May Creek, and Dan Creek cannot be separated from those for McCarthy.

The communities of McCarthy and Chitina were last surveyed by Division of Subsistence for the 2012 study year. Although these results include portions of the areas being considered in this analysis, the results cannot be separated from those for the community of McCarthy or Chitina.

A Wide Diversity of Fish and Wildlife Resources

One of the broadest of the eight factors calls for "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." **Table 4** compares overall subsistence harvest and use patterns for McCarthy Road and the South Wrangell Mountains with that of Chitina and Copper Center, both of which have a customary and traditional use determination for salmon in the Chitina Subdistrict. Because McCarthy Road was only surveyed as a discrete area for the 1982 to 1983 and 1987 to 1988 study years, these are the years used for comparison (**Table 4**). McCarthy already has a customary and traditional use determination for salmon in the Chitina Subdistrict, but results for the community during the comparison study years cannot be separated from those for Dan Creek, May Creek, and Kennicott.

The data show that McCarthy Road's use of all wild resources was very similar to that of Chitina and Copper Center. In both study years, McCarthy Road's total harvest in pounds of food per person was less than that of Chitina, but more than that of Copper Center. McCarthy Road compares favorably in terms of the average number of species harvested (8) and the percentage of surveyed households using and harvesting wild resources (100%) in both years (**Table 4**). In 1982 to 1983, Sockeye Salmon, hare, moose, greenling, and lingcod (in that order) were the most important resources in terms of edible weight (ADF&G 2026). In 1987 to 1988, the most important resources in terms of edible weight were Sockeye Salmon, moose, rainbow trout, caribou, and Chinook Salmon (McMillan and Cuccarese 1988). Caribou were not available in the immediate vicinity of McCarthy Road, and people travelled by plane to the White River or Chisana to hunt them there (Reckord 1983). Lake fish including Dolly

Varden, burbot, grayling, and rainbow trout are abundant along the McCarthy Road and were utilized by residents (Reckord 1983).

Although results cannot be separated for the South Wrangell Mountain/South Park sample, which includes McCarthy, Kennicott, May Creek, and Dan Creek, collectively these results also compare favorably with those for Chitina and Copper Center. This sample had the highest per person harvest of wild foods in the 1982 to 1983 study year, although the estimated total harvest was the lowest in 1987 to 1988 (**Table 4**). These communities harvested 12 different species in 1982 to 1983, and 7 in 1987 to 1988. In both study years, 100% of surveyed households in the Wrangell Mountain/South Park sample harvested and used wild resources (**Table 4**). The most important resources in terms of edible weight in 1982 to 1983 were moose, Sockeye Salmon, hare, deer, and black bear (in that order) (ADF&G 2026). Deer would not have been available in the local vicinity. In 1987 to 1988, the most important resources in terms of edible weight were moose, Sockeye Salmon, black bear, caribou, and Coho Salmon (in that order) (ADF&G 2026).

Table 4. Comparison of four measures of wild food harvest for McCarthy Road, Chitina, and Copper Center, as estimated in subsistence surveys for the 1982 to 1983 study years (Stratton and Georgette 1984, McMillan and Cuccarese 1988, ADF&G 2026).

Area	Study year	Pounds of Wild Food Harvested per Person	Average Number of Species Harvested	Percentage of Households Using Wild Resources	Percentage of Households Harvesting Wild Resources
McCarthy Road	1982-3	131.4	8	100%	85%
Chitina	1982-3	190.8	6.5	100%	87%
Copper Center	1982-3	113.9	4.6	100%	85%
South Wrangell Mtns*	1982-3	195.7	12	100%	100%
McCarthy Road	1987-8	230.18	8	100%	100%
Chitina	1987-8	342.38	5.2	94%	89%
Copper Center	1987-8	174.3	5.5	100%	100%
South Wrangell Mtns**	1987-8	138.9	7	100%	100%

*Includes McCarthy, Kennicott, May Creek, and Dan Creek.

**Includes McCarthy-Kennicott, May Creek, and Dan Creek. Referred to as the South Park sample in McMillan and Cuccarese (1988) and as the South Wrangell Mountains in the CSIS (ADF&G 2026).

Salmon Use and Harvest

While McCarthy Road used a wide variety of resources in both study years, Sockeye Salmon was especially important to the community. During the 1982 to 1983 study year, Sockeye Salmon was the most important species in terms of the number of households using (92%) and edible weight harvested (about 45 pounds per person), making up about 30% of the area's total wild food harvest (ADF&G 2026, **Table 5**). Chinook Salmon provided about 4 pounds of food per person (ADF&G 2026).

Additionally, residents harvested some “landlocked salmon” (ADF&G 2026). Subsistence surveys include salmon harvest by the community during the study year from any area. More information about areas used to fish for salmon is included later in this analysis.

In the 1987 to 1988 study year, Sockeye Salmon was again the most important species to residents of McCarthy Road in terms of the number of households using (88%) and edible weight harvested (about 82 pounds per person), making up about 36% of the area’s total harvest (ADF&G 2026, **Table 5**). Chinook Salmon provided about 16 pounds of food per person (ADF&G 2026). In addition to Sockeye and Chinook salmon, some Coho and “landlocked salmon” were harvested (ADF&G 2026, **Table 5**).

During both study years, Sockeye Salmon was the second most important resource for the South Wrangell Mountain communities after moose in terms of edible weight harvested, and a higher percentage of surveyed households used Sockeye Salmon than any other individual resource. In 1982 to 1983, the South Wrangell Mountain communities harvested about 31 pounds of Sockeye Salmon per person, which was similar to the sample’s 1987 to 1988 harvest of 30 pounds per person (ADF&G 2026, **Table 6**). In 1982 to 1983, 93% of surveyed households used Sockeye Salmon, and in 1987 to 1988, about 90% of surveyed households used this resource (**Table 6**). That study year, residents also harvested Chinook and “landlocked salmon” (**Table 6**). After moose and Sockeye Salmon, some of the most important resources for the community included Pacific Halibut, black bear, Dolly Varden, hare, Chinook Salmon, deer, and grouse (ADF&G 2026). The fact that some of these species would not have been available locally suggests that at least some of the households in this sample used a mobile, relatively far-reaching strategy to meet at least some of their wild food needs.

Table 5. Four measures of salmon use by residents of McCarthy Road (Stratton and Georgette 1984, McMillan and Cuccarese 1988, ADF&G 2026). Species not listed in a survey year were not harvested that year.

Resource	Survey years	Percentage of Surveyed Households Using	Percentage of Surveyed Households Harvesting	Estimated Number Harvested	Pounds per Person Harvested
Sockeye Salmon	1982-3	92%	31%	497	40.0
Chinook Salmon	1982-3	39%	23%	12	4.3
“Landlocked Salmon”	1982-3	15%	15%	43	0.8
Sockeye Salmon	1987-8	88%	53%	763	82.6
Chinook Salmon	1987-8	35%	29%	35	15.8
“Landlocked Salmon”	1987-8	6%	6%	56	2.0
Coho Salmon	1987-8	12%	6%	2	0.3

Table 6. Four measures of salmon use by residents of the South Wrangell Mountains, which includes McCarthy, Kennicott, May Creek, and Dan Creek (Stratton and Georgette 1984, McMillan and Cuccarese 1988, ADF&G 2026).

Resource	Study years	Percentage of Surveyed Households Using	Percentage of Surveyed Households Harvesting	Estimated Number Harvested	Pounds per Person Harvested
Sockeye Salmon	1982-3	93%	40%	256	31.5
Chinook Salmon	1982-3	53%	20%	13	6.8
Coho Salmon	1982-3	27%	13%	21	3.8
Pink Salmon	1982-3	7%	7%	19	1.5
Sockeye Salmon	1987-8	86%	27%	345	29.7
Chinook Salmon	1987-8	36%	14%	15	5.4
Coho Salmon	1987-8	43%	21%	76	8.5

In addition to subsistence surveys, Federal harvest data indicate residents who live along McCarthy Road to Kennicott and Dan Creek have received Federal subsistence permits for the Chitina Subdistrict since this permit first became available in 2002 (OSM 2026). All Federal Subsistence Chitina Subdistrict permit records for residents of the Chitina, McCarthy, Kennicott, and Dan Creek areas were reviewed, and addresses located along McCarthy Road, Kennicott Road, and Dan Creek Road were identified. Residents reported harvesting Sockeye, Chinook and Coho salmon from the Chitina Subdistrict (OSM 2026). The number of permits issued, fished, and resulting harvest are shown in **Table 7**. All harvest was by dip net (OSM 2026).

Table 7. Reported Federal subsistence fishing data for the Chitina Subdistrict by residents of McCarthy Road, Dan Creek Road, and Kennicott Road from 2002 to 2026 (limited permits issued data only for 2026) (OSM 2026).

Residential Area	Permits Issued	Permits Fished	Number of Sockey Salmon Harvested	Total Number of Salmon Harvested
McCarthy Road	246	136	3122	3151
Dan Creek Road	74	38	540	572
Kennicott Road	74	28	260	261
Total	394	202	3922	3984

Salmon Harvest Locations

Reckord observed that while salmon were important to all McCarthy residents, those with planes flew to Cordova to fish, while those with cars travelled to Chitina (Reckord 1983). On the other hand, Stratton and Georgette reported that all four of the surveyed households that caught salmon in the 1982 to 1983 study year “lived between Chitina and Strelna at Mile 14. Because it becomes increasingly time-consuming to reach the river the further east [on] McCarthy Road one lives, residents beyond Strelna were less likely to harvest salmon” (Stratton and Georgette 1984: 120). However, it is important to note that driving times along McCarthy Road have decreased since the 1980s due to road improvements (Jacobs 2024). Although Stratton and Georgette do not specifically describe areas used by McCarthy Road residents for salmon fishing, their statement that those living closer to Chitina were more likely to fish indicates that residents were oriented towards Copper River fishing. Of note, while Chitina features prominently in documented fishing locations, there is little mention of fishing in the Glennallen Subdistrict by these residents during the study periods. Information on salmon fishing locations used by surveyed McCarthy Road households for the 1987 to 1988 study year are not available (McMillan and Cuccarese 1988).

During her time in the “Upper Nizina,” Reckord observed that although Coho and Sockeye salmon were known to spawn in the Nizina, they were generally in poor condition when they arrived, and were not usually harvested in the immediate vicinity. Stratton and Georgette also reported that salmon were not generally available in the vicinity of the South Wrangell Mountain communities during the time of their study (1984). However, some salmon were available in tributaries, including in the Dan Creek Area (Stratton and Georgette 1984).

The Nizina residents who had the means to travel harvested salmon at Chitina (Reckord 1983). For residents of McCarthy and Kennicott, the Copper River was also the main source of salmon, although some salmon were also taken from Long Lake along the McCarthy Road (Reckord 1983: 214). Additionally, like McCarthy Road residents, some Nizina and McCarthy-Kennicott families with planes traveled to Cordova to harvest salmon there (Reckord 1983). However, during the 1982 to 1983 study year, Stratton and Georgette (1984) found that most of the Sockeye salmon harvested by South Wrangell Mountain communities was taken at Chitina. Additionally, these residents harvested some Coho Salmon near Dan Creek (Stratton and Georgette 1984).

Harvest Methods

Subsistence methods for harvesting fish are characterized by efficiency and economy of effort. Fish wheels have been the preferred gear for Copper Basin residents since their introduction at the beginning of the 20th century, but there is a history of fish wheel prohibition in the Chitina Subdistrict under State regulations (Fall and Simeone 2010). Reckord did not comment on fishing methods used by residents of McCarthy Road (1983). During the 1982 to 1983 study year, three of the four McCarthy Road households that harvested Sockeye salmon used fishwheels, and one used a dipnet; gear types used to harvest Chinook Salmon were not specified (Stratton and Georgette 1994). During

this time on the Copper River, only fish wheels could be used in the Glennallen Subdistrict, and only dip nets could be used in the Chitina Subdistrict (Fall and Simeone 2010).

In the 1987 to 1988 survey, about 14% of the salmon caught by residents of McCarthy Road were harvested with rod and reel, and the remaining 86% were harvested by “other gear,” which includes fishwheels and dipnets (ADF&G 2026). Breaking this down for Sockeye and Chinook salmon, 6% of Sockeye Salmon were harvested with rod and reel, and the remaining 94% were caught with “other gear,” whereas 65% of Chinook Salmon were harvested by rod and reel, and the remaining 35% were harvested with “other gear” (ADF&G 2026). During this time under State regulations, the Chitina Subdistrict was only for non-rural Alaskans, and the Glennallen Subdistrict was only for rural Alaskans; dip nets were allowed in both, but fish wheels were only allowed in the Glennallen Subdistrict (Fall and Simeone 2010).

Reckord found that residents of Upper Nizina and McCarthy-Kennicott used fish wheels or dip nets at Chitina (Reckord 1983). In the 1982 to 1983 study year, South Wrangell Mountain households took most of their Sockeye Salmon at Chitina with fishwheels. One family removed Sockeye Salmon from a Bristol Bay commercial catch (Stratton and Georgette 1984). During the 1987 to 1988 study year, all the South Wrangell Mountain communities’ harvest of Sockeye Salmon and 47% of the Chinook Salmon harvest was by “other gear”; the remaining Chinook Salmon harvest was by rod and reel (ADF&G 2026).

Salmon Processing and Storage

In the late 1970s to early 1980s residents of McCarthy Road froze, canned, or smoked salmon (Reckord 1983). During that time, residents of Upper Nizina caught enough fish at Chitina to “smoke, can, or pickle for the winter” (Reckord 1983:226). McCarthy-Kennicott residents froze, canned, or salted their salmon (Reckord 1983). Methods used by McCarthy Road residents to preserve salmon were not described in the two subsequent subsistence surveys (Stratton and Georgette 1984, McMillan and Cuccarese 1988). During the 1982 to 1983 study year, South Wrangell Mountain residents ate salmon fresh, canned, or smoked. Few of these households had the capacity to freeze salmon at this time (Stratton and Georgette 1984).

Sharing Salmon

No information was collected on salmon sharing by residents of McCarthy Road, McCarthy-Kennicott, or Upper Nizina during Reckord’s study, or during the first subsistence survey for the 1982 to 1983 study year (Stratton and Georgette 1984). Although no data were collected on giving and receiving resources during the first subsistence survey, the disparity between the percentage of surveyed McCarthy Road households harvesting salmon (46%) and the percentage of surveyed households using salmon (92%) indicates that sharing occurred, although it is also possible that salmon were shared from outside the community (ADF&G 2026). Similarly, 53% of surveyed South Wrangell Mountain households harvested salmon in 1982 to 1983, while 100% used salmon (ADF&G 2026). Data on giving and receiving of salmon are available for the 1987 to 1988 study year, during which 18% of surveyed McCarthy Road households gave away salmon, and 41% of households received salmon

from others (ADF&G 2026). During the same year, 43% of surveyed South Wrangell Mountain households gave away salmon, and 79% received salmon (ADF&G 2026).

A Long-term Pattern of Use

Customary and traditional subsistence harvest of fish is characterized by a long-term, consistent pattern of use, excluding interruptions beyond the control of the community or area. The Board has never formally defined what constitutes a long-term pattern of use in terms of time-depth. The NPS categorizes certain communities as “traditionally associated people,” which it defines as “contemporary park neighbors and ethnic or occupational communities that have been associated with a park for two or more generations (40 years), and whose interests in the park’s resources began before the park’s establishment” (NPS 2006). The Alaska-specific concept of a resident zone community does not include any specific time-depth of residency or subsistence use as part of its definition. Resident zone communities are “the communities and areas near, a national park or monument in which persons who have customarily and traditionally engaged in subsistence uses within the national park or monument permanently reside” (36 CFR 13.420).

Current residents of McCarthy Road occupy traditional Ahtna territory, and do not trace their history to the first wave of miners and settlers who arrived in the early 1900s. Current residents are historically connected with homesteaders who began arriving in the 1950s seeking a subsistence lifestyle (Kizzia 2021). Although data going back to the 1950s are lacking, it is likely that residents of the McCarthy Road have been fishing for salmon on the Copper River, including what is now the Chitina Subdistrict, since this time. During the late 1970s and early 1980s, it appears that when fishing on the Copper River, these residents focused their efforts at Chitina. The Board has already recognized the customary and traditional uses of salmon in the Chitina Subdistrict by residents of McCarthy, who share an identical history of resettlement since the 1950s.

Seasonality of Harvest

Traditionally, the Ahtna harvested salmon from the Copper River and its tributaries from mid-May to August, with Sockeye usually being harvested in early June, although the timing of runs varied due to changing water levels (de Laguna and McClellan 1981, Simeone 2010). The seasonality of salmon harvest in the Upper Copper River District has been shaped by regulations since the State of Alaska began to manage subsistence fishing on the river immediately following statehood (Fall and Simeone 2010). Currently, residents of McCarthy Road are eligible to fish in the Chitina Subdistrict State personal use fishery, which opens no later than June 10 and goes through September 30 only during periods established by emergency order. However, Chinook Salmon may not be taken until after June 30 (**Table 1**). In the Chitina Subdistrict, “Chinook Salmon are taken beginning in June and continuing into August; Coho Salmon are harvested [in] late August and September” (Fall and Simeone 2010).

Handing Down and Transfer of Knowledge

Reckord describes how settlers in the Wrangell region developed their subsistence skills: “At first some of the white settlers learned from the Native people; they were educated by young Natives in the

local species and where these species could be taken. Others implemented techniques used on the American frontier. Today, putting up fish and berries, as well as hunting and running fishwheels are common activities conducted each year by the white population” (1983:166). While detailed information about transmission of subsistence fishing knowledge was not found in the literature, Brewster (2015) discusses handing down of knowledge about trapping from one generation of settlers to the next in what is now Wrangell-St. Elias National Park and Preserve as part of a seasonal round in a mixed subsistence-cash economy and way of life: “Respecting the past and passing down knowledge from the “old-timers” to the younger generation...is a key part of the non-Native trapping tradition in the Wrangell-St. Elias area” (Brewster 2015:112).

Discussion and Effects

If this proposal is adopted, permanent residents who live along McCarthy Road to Kennicott and Dan Creek would have their customary and traditional use of salmon explicitly recognized in the Chitina Subdistrict of the Upper Copper River District. These residents would therefore become explicitly recognized as federally qualified to fish for salmon under Federal subsistence regulations in the Chitina Subdistrict, which are more liberal than the State personal use regulations for the Chitina Subdistrict. Adding McCarthy Road to the existing customary and traditional use determination for salmon in the Chitina Subdistrict would reflect Board intent when McCarthy was initially added to this determination.

In the Chitina Subdistrict, becoming federally qualified means that fishers could harvest under a Federal subsistence limit of 30 salmon for a single person household (with an option to request permits for up to 200 additional salmon), or 60 salmon for a household of two or more (with an option to request permits for up to 500 additional salmon), as opposed to a State personal use limit of 25 salmon for the head of the household, plus ten salmon for each additional household member. Additionally, while those fishing under State regulations in the Chitina Subdistrict may only keep one Chinook Salmon, federally qualified subsistence users may keep up to five Chinook Salmon caught by dip net and five caught by rod and reel.

Federal subsistence fishing permits for the Chitina Subdistrict have routinely been issued to residents of the McCarthy Road to Kennicott and Dan Creek since 2002. Formal recognition of their customary and traditional uses of salmon in the Chitina Subdistrict will clarify and legitimize these users’ status under Federal regulations, reduce confusion, and may increase the number of residents of the area fishing under Federal subsistence regulations.

If this proposal is not adopted, permanent residents who live along McCarthy Road to Kennicott and Dan Creek will only be able to fish in the Chitina Subdistrict under State personal use regulations. Given that Federal subsistence fishing permits for the Chitina Subdistrict have been issued to residents of the McCarthy Road to Kennicott and Dan Creek since 2002, this would entail a significant reduction in subsistence opportunity for many users in the area and may conflict with original Board intent. Residents of the McCarthy Road to Kennicott and Dan Creek could continue to fish for salmon under Federal Subsistence regulations in the Glennallen Subdistrict.

If these areas are not included in a customary and traditional use determination for salmon in the Chitina Subdistrict, the Board may choose to clarify where the boundaries of Chitina and McCarthy end, such as at the CDP boundaries, while recognizing that some portions of McCarthy Road, Kennicott Road, and Dan Creek Road are within the Chitina and McCarthy CDPs, and that CDP boundaries can change over time.

OSM PRELIMINARY CONCLUSION

Support Proposal FP26-07 with modification to clarify that the determination not only includes residents along the road “to Dan Creek and Kennicott,” but also includes residents of May Creek, Dan Creek, and Kennicott.

Customary and Traditional Use Determination—Salmon

PRINCE WILLIAM SOUND AREA

Chitina Subdistrict of the Upper Copper River District

*Residents of Cantwell, Chickaloon, Chisana, Chistochina, Chitina, Copper Center, Dot Lake, Gakona, Gakona Junction, Glennallen, Gulkana, Healy Lake, Kenny Lake, Lower Tonsina, McCarthy, Mentasta Lake, Nabesna, Northway, Paxson-Sourdough, Slana, Tanacross, Tazlina, Tetlin, Tok, Tonsina, and those individuals that live along the Tok Cutoff from Tok to Mentasta Pass, and along the Nabesna Road, **along the McCarthy Road, along the Nizina/Dan Creek Road including May Creek and Dan Creek, and along the Kennicott Road including Kennicott.***

Justification

Transcripts of Board deliberation related to McCarthy’s determination in 2002 indicate the Board intended to include residents living on the road between Chitina and McCarthy. The history and subsistence practices of residents of McCarthy Road to Kennicott and Dan Creek are indistinguishable from those of McCarthy and Chitina, two communities that have already had their customary and traditional use of salmon recognized in the Chitina Subdistrict. Portions of these road areas are within the McCarthy and Chitina CDPs, and these areas are included in local understandings of wider community boundaries, particularly in the case of McCarthy. Portions of McCarthy Road, Kennicott Road, and Dan Creek Road have also been included in definitions of Chitina and McCarthy for the purposes of ethnographic and subsistence survey studies.

Additionally, residents along the McCarthy Road between Chitina and McCarthy are already recognized by the Wrangell-St. Elias Subsistence Resource Commission as within resident zone communities. These residents are therefore considered federally qualified to harvest under Federal subsistence regulations on National Park Service lands and waters, for those species for which the Board has made a customary and traditional use determination. These residents and residents of Kennicott, Dan Creek, and May Creek have in practice been issued Federal subsistence permits for the Chitina Subdistrict since 2002, when this permit first became available. Residents reported a robust harvest of Sockeye, Chinook, and Coho salmon from the Chitina Subdistrict under Federal subsistence fishing regulations over this time, all by dip net.

Residents of McCarthy Road to Kennicott and Dan Creek already have a customary and traditional use for salmon in the Glennallen Subdistrict. They also already have a customary and traditional use determination for salmon in the “remainder” of the Prince William Sound Area, and for many wildlife species in Units 11 and 13D, which surround the Chitina Subdistrict. These existing determinations highlight the extent to which these residents’ customary and traditional subsistence practices in this region have already been recognized by the Board.

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APPENDIX 1

Existing Wildlife Customary and Traditional Use Determinations for McCarthy Road

Table A1. McCarthy Road has wildlife C&Ts for the following species and areas as a named community:

Residents of	Species	Area
McCarthy Road— mileposts 0-62	Sheep	Unit 11 North of the Sanford River
McCarthy Road— mileposts 0-62	Sheep	Unit 11 Remainder

Table A2. McCarthy Road has wildlife C&Ts for the following species and area as part of Unit 11, in Unit 11 or Unit 13D (which border the Chitina Subdistrict).

Residents of	Species	Area
Unit 11	Black Bear	Unit 11, North of the Sanford River
Unit 11	Black Bear	Unit 11 Remainder
Unit 11	Brown Bear	Unit 11, North of the Sanford River
Unit 11	Brown Bear	Unit 11 Remainder
Unit 11	Caribou	Unit 11, North of the Sanford River
Unit 11	Caribou	Unit 11 Remainder
Unit 11	Goat	Unit 11
Unit 11	Moose	Unit 11, North of the Sanford River
Unit 11	Moose	Unit 11 Remainder
Unit 11	Wolf	Unit 11
Unit 11	Grouse	Unit 11
Unit 11	Ptarmigan	Unit 11
Unit 11	Caribou	Unit 13A and 13D
Unit 11	Wolf	Unit 13
Unit 11	Grouse	Unit 13
Unit 11	Ptarmigan	Unit 13

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Our Culture unites us; Our Land Sustains us; Our People are Prosperous

July 27, 2026

Federal Subsistence Board
Office of Subsistence Management
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Sent via email to subsistence@ios.doi.gov

Subject: Public Comment on FP 27-06; Docket Number: DOI-2025-0071

Thank you for the opportunity to comment on the Southcentral Fisheries Proposal (FP) 27-06 included in the 2027-2029 Fish and Shellfish Regulatory Proposals and Closure Reviews.

Ahtna Tene Nene writes to respectfully oppose FP 27-06, which proposes to expand the Chitina Subdistrict of the Upper Copper River District to include residents along the McCarthy Road to Dan Creek and Kennicott for salmon.

Any expansion of customary and traditional (C&T) use designations must be supported by thorough evidence and should maintain the integrity of the Federal Subsistence Board's process. Ahtna Tene Nene understands the National Park Service faces challenges with inconsistent permitting and a lack of clarity to confirm eligibility for residents who live between and just beyond the Chitina Census Designated Place and the McCarthy Designated Place. However, curing confusion among residents and field agency staff fails to provide sufficient justification to expand the list of areas and communities eligible for C&T use determinations. Similarly, modern day residents' geographic proximity to the Copper River along the McCarthy Road does not demonstratively prove C&T use of salmon.

Rather, evidence of historical, long-term intergenerational resource use and transmission of knowledge and practices specific to the community must exist. Communities undertook the arduous task of documenting and demonstrating a long-standing pattern of customary and traditional use to prove the eight factors and obtain C&T status. This evidence-driven process requires substantial testimony, data, and evidence gathering, as well as community involvement. We expect the same standards to continue to be applied to all communities seeking C&T use designation. Without adequate documentation and verification, there is no assurance that customary and traditional use has occurred in those areas.

Additionally, there are conservation concerns for salmon. The Amounts Necessary for Subsistence (ANS) have not been met in recent years for salmon in the upper bounds of the Copper River. For king salmon, subsistence goals have not been met due to historically low runs. Federal and state managers have had to implement mandatory closures, gear restrictions, and prohibit the retention of kings. And though sockeye allocations are frequently met for the river as a whole, the upper reaches of the Glennallen Subdistrict have chronically failed to meet the ANS targets.

We recognize that all proposals remain to be appropriately analyzed and assessed. Ahtna Tene Nene therefore urges the Office of Subsistence Management to conduct a comprehensive C&T use analysis specific to the proposed expansion zone. Thank you for your commitment to upholding the legal frameworks that protect our traditional ways of life.



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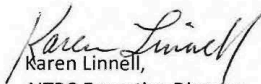
Dear Mr. Chairman Christianson and Board Members,

On behalf of the Ahtna Intertribal Resource Commission (AITRC) Fish & Wildlife Committee, thank you for the opportunity to submit comments for the 2027-2029 Subsistence Fisheries Regulations for the Federal Subsistence Board. AITRC advocates for the eight federally recognized Tribes in the Ahtna Territory, working in partnership to protect and strengthen the Ahtna People's continued customary and traditional use of fisheries, wildlife, and natural/cultural resources across its territory.

The enclosed comments reflect the unified input of AITRC's member Tribes that make up our Fisheries and Wildlife Committee, and our professional staff. These positions are grounded in generations of Indigenous knowledge and lived experience managing and relying upon species such as the Copper River Salmon. Our comments, support, and opposition aim to ensure that subsistence resources remain accessible, sustainable, and managed in ways that reflect the priorities of the Indigenous communities who depend on them.

We appreciate the Board's continued engagement with Tribal voices and hope these comments assist in your deliberations. Thank you for your service and for considering the perspectives of AITRC and the Atnahwt'aene.

Tsin'aen,


Karen Linnell,
AITRC Executive Director

*Honoring and integrating traditional knowledge and values of the 'Atnahwt'aene' (Ahtna people) through stewardship that is innovative and respectful of the land for all generations of people who depend on the Ahtna Territory to maintain their cultural identity and ways of life.
(Tsin'aen (Thank you in Atnakenag'e)).*

Proposal 27-06

AITRC opposes Proposal 27-06, submitted by the Wrangell-St. Elias National Park and Preserve Subsistence Resource Commission, which seeks to recognize customary and traditional (C&T) use for the area along McCarthy Road to Dan Creek and Kennecott.

AITRC staff and the Fisheries and Wildlife Committee are concerned that extending recognition to a location rather than evaluating individual users could weaken the standard for customary and traditional use. In our view, residents with long-term, consistent subsistence use should pursue individual recognition or apply for a state subsistence permit, rather than support a location-based change of this kind.

As noted above, the proposal seeks recognition for a place rather than for the people who may qualify through established use. This distinction is especially important in a rapidly growing area that increasingly includes recreational and part-time residents.

Section 16.05.940 (7) Customary and Traditional means the non-commercial, long-term, and consistent taking of, use of, and reliance upon fish or game in a specific area and the use patterns of that fish or game that have been established over a reasonable period of time, taking into consideration the availability of the fish or game;

AITRC believes many current residents do not meet the threshold for a federal regulatory change that would recognize this location for customary and traditional use. For that reason, the Fisheries and Wildlife Committee urges the Federal Subsistence Board to reject the proposed change.

- Residents with long-term, consistent subsistence use may seek individual customary and traditional use permits, if appropriate.
- Eligible residents may also apply for a state subsistence permit.
- A location-based designation should not substitute for demonstrating established customary and traditional use by the individuals seeking recognition.

Proposal 27-07

AITRC supports proposal 27-07 submitted by the Southcentral Regional Advisory Council's proposed addition;

Proposed Federal Regulation (addition)

36 CFR 242.27(e)(11)

(v) In the Upper Copper River District, you may take salmon only by fish wheels, rod and reel, or dip nets. In the Lower Copper River Area, you may take salmon only by dip nets and rod and

reel. All salmon retained from the Lower Copper River Area must be reported to area managers within 48 hours of harvest.

(A) In the Lower Copper River Area, you may not dip net from a boat.

(B) In the Lower Copper River Area, the salmon fishery opens on June 1 and closes on September 30.

(C) Dip nets are prohibited within 500 yards below and 100 yards above any salmon bearing river or stream tributary confluence in the upper Copper River

AITRC supports this proposed regulation change because it addresses conservation concerns in easily accessible fishing areas near major tributary confluences. These locations can place disproportionate pressure on specific salmon stocks, particularly those that are easiest to reach.

- Dip netting near major tributary confluences can disproportionately affect tributary-specific salmon stocks.
- Highly accessible sites may attract concentrated harvest pressure, increasing conservation risks.
- For example, the Klutina River may experience increased transporter pressure from nearby fishing guides during periods of conservation measures, such as sport fishing closures in that tributary.

Conclusion

In conclusion, AITRC respectfully urges the Federal Subsistence Board to consider these comments in a manner that protects the long-term sustainability of Copper River salmon and upholds the customary and traditional subsistence uses of the Ahtna people. AITRC opposes Proposal 27-06 because a location-based designation should not replace the established requirement to demonstrate long-term, consistent customary and traditional use by qualified individuals. AITRC supports Proposal 27-07 because it provides an important conservation measure for salmon-bearing tributary confluences and helps reduce concentrated harvest pressure on vulnerable salmon stocks.

AITRC appreciates the Board's consideration of these comments and remains committed to working collaboratively to ensure that federal fisheries management reflects Indigenous knowledge, Tribal priorities, and responsible stewardship for future generations.