

Analysis of Request to Add Tolsona to the Resident Zone of Wrangell-St. Elias National Park

Issue

On January 26, 2024, Wrangell-St. Elias National Park and Preserve received a letter from the Tolsona Community Corporation requesting that Tolsona be added to the Wrangell-St. Elias National Park resident zone for subsistence eligibility purposes (Appendix 1). The resident zone identifies communities whose residents are eligible to engage in subsistence activities in the national park (36 Code of Federal Regulations (CFR) 13.430). Tolsona Community Corporation wrote in their letter that Tolsona has been a named place for countless generations, with a strong sense of local culture, a remote Alaskan lifestyle, and strong community ties. Tolsona was formally recognized by the State of Alaska as a community beginning in the 1980s. Depending on the year and number of residents, between 20% and 70% of residents use subsistence resources, and this use is strongly engrained in the community.

This analysis evaluates whether Tolsona meets the criteria in 36 CFR 13.430 for addition to the resident zone: “significant concentrations of rural residents who, without using aircraft as a means of access for purposes of taking fish or wildlife for subsistence uses ... have customarily and traditionally engaged in subsistence uses within a national park or monument.” If Tolsona meets these criteria, the National Park Service (NPS) will begin a regulation change process and environmental compliance process to add Tolsona to the resident zone. If Tolsona does not meet these criteria, Tolsona residents continue to be eligible to hunt, trap and fish in Wrangell-St. Elias National Preserve under federal subsistence regulations when they have federal customary and traditional (C&T) use determinations for the species and areas, and otherwise under State of Alaska regulations.

Land Status and Subsistence Eligibility

Eligibility to harvest fish and wildlife within Wrangell-St. Elias National Park and Wrangell-St. Elias National Preserve is based on land status (that is, whether national park, national preserve, or non-federal lands) along with location of a subsistence user’s primary permanent residence. This section describes key land status distinctions within Wrangell-St. Elias along with both Federal Subsistence Management Program and NPS regulations regarding community and individual eligibility.

Wrangell-St. Elias National Park and Wrangell-St. Elias National Preserve span most of Unit¹ 11, a portion of Unit 12, and a small section of Unit 13C (see Figure 1). Unit 11 is comprised of approximately 87% Federal public lands of which 84% are NPS-managed lands and 3% are U.S.

¹ State of Alaska regulations use the term “game management unit” (or GMU) for the areas described in federal subsistence regulations as “units.”

Forest Service-managed lands. Of the NPS-managed lands in Unit 11, 73% are designated as national park and 27% as national preserve. Unit 12 is comprised of approximately 60% Federal lands, 48% of which are NPS-managed lands. The majority of the NPS-managed lands in Unit 12 are national preserve. All of the NPS-managed lands in Unit 13C are designated as national preserve.

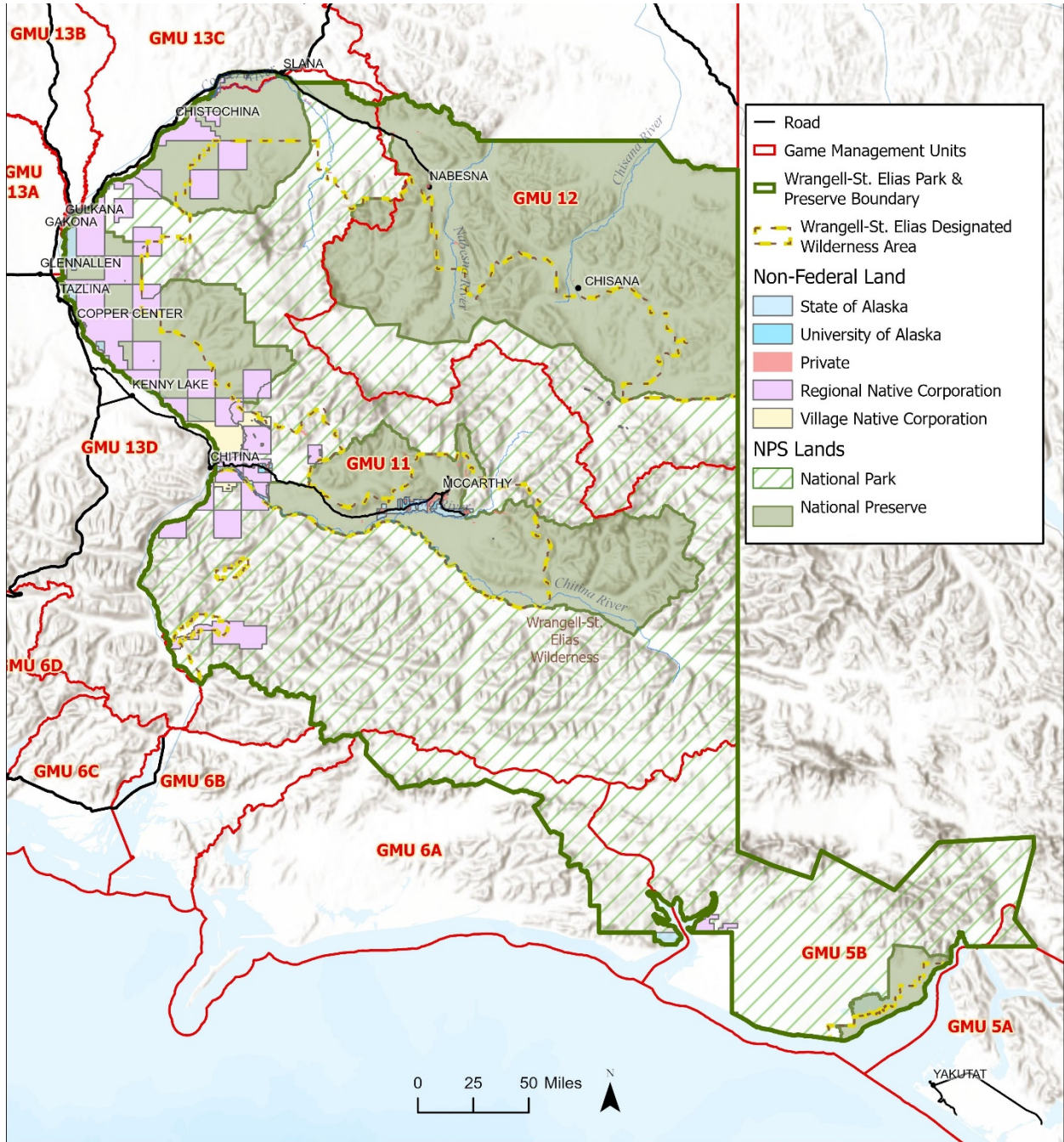


Figure 1: Map of Wrangell-St. Elias National Park and National Preserve Lands.

Consistent with the Alaska National Interest Lands Conservation Act (ANILCA), Federal public lands within Wrangell-St. Elias National Park are closed to hunting and trapping except to residents of a resident zone community, residents who live inside the national park's boundary, and rural residents with subsistence eligibility permits issued under 36 CFR 13.440 (hereafter referred to as 13.440 permits, although prior to 2006, the regulation was numbered 36 CFR 13.44 and the permits were referred to as 13.44 permits). Lands designated as national preserve are open to "sport" hunting² under State of Alaska general hunting regulations as well as to hunting under federal subsistence regulations by rural residents with a C&T use determination for the species and area.

Existing Federal Regulation

36 CFR 13.1902 Subsistence.

(a) ***Subsistence resident zone communities.*** The following communities and areas are included within the resident zone for Wrangell-St. Elias National Park: 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.

Proposed Federal Regulation

36 CFR 13.1902 Subsistence.

(a) ***Subsistence resident zone communities.*** The following communities and areas are included within the resident zone for Wrangell-St. Elias National Park: 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, Tolsona, Tonsina, and Yakutat.

Subsistence Eligibility: National Park Service Regulations

As stated previously, NPS regulations determine subsistence eligibility specifically in the national *park*. Under 36 CFR 13.430, a person must live in the park's resident zone or hold a 13.440 permit, in order to engage in subsistence uses within the national park. The resident zone includes an area within Wrangell-St. Elias National Park (including any non-federal lands that are surrounded by the national park) and "the communities and areas near a national park ... which contain significant concentrations of rural residents who, without using aircraft as a means of access for purposes of taking fish or wildlife for subsistence uses..., have customarily and traditionally engaged in subsistence uses within a national park," (36 CFR 13.430). The resident zone communities for Wrangell-St. Elias National Park are listed above.

² Use of the term "sport" stems from ANILCA Section 1313, which specifically authorizes the taking of wildlife for sport purposes in national preserves.

Subsistence Eligibility: Federal Subsistence Regulations

To be eligible to harvest fish and wildlife for subsistence on federal lands in Alaska, rural residents³ must make their primary permanent residence in a community or area for which a C&T use has been determined to exist by the Federal Subsistence Board. The Federal Subsistence Board is the decision-making body for federal subsistence regulations and is made up of the five regional directors of federal land management agencies in Alaska, five rural subsistence users, and a chair (50 CFR 100.10).

C&T use determinations identify which communities and areas are eligible to harvest particular species in specific areas under federal subsistence regulations. C&T use is evaluated based on consideration of the following 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 eight factors are not a check list. Rather, the Federal Subsistence Board makes C&T use determinations based on a holistic application of these eight factors (50 CFR 100.16(b) and 36 CFR 242.16(b)) along with reports and information provided by the federal subsistence regional advisory councils.

³ For the Federal Subsistence Management Program, “resident” is defined as any person who has their primary, permanent home for the previous 12 months within Alaska and whenever absent from this primary, permanent home, has the intention of returning to it (50 CFR 100.4). For the National Park Service, “local rural resident” defined as: “(1) Any person who has his/her primary, permanent home within the resident zone as defined by this section, and whenever absent from this primary, permanent home, has the intention of returning to it , and (2) Any person authorized to engage in subsistence uses in a national park or monument by a subsistence permit issued pursuant to § 13.440” (36 CFR 13.420). Both definitions list factors that may be considered in demonstrating the location of a primary, permanent residence.

Federal Subsistence Eligibility: National Park Service and Federal Subsistence Regulations

Eligibility for hunting, trapping, and fishing in Wrangell-St. Elias National *Preserve* under federal subsistence regulations is based on rural residency plus C&T use determinations, and one does not need to live in the resident zone. For lands within Wrangell-St. Elias National *Park*, rural residents must qualify for subsistence eligibility under both NPS regulations (by living in a resident zone community, living within the national park, or holding a 13.440 permit) and Federal Subsistence Management Program regulations (by living in a community or area with an established C&T use determination). Figure 2 illustrates this relationship between NPS and Federal Subsistence eligibility regulations, using the example of regulations for harvesting moose in Unit 11. Only residents of communities listed in both circles are eligible to harvest moose on lands in Unit 11 that are designated as Wrangell-St. Elias National Park.

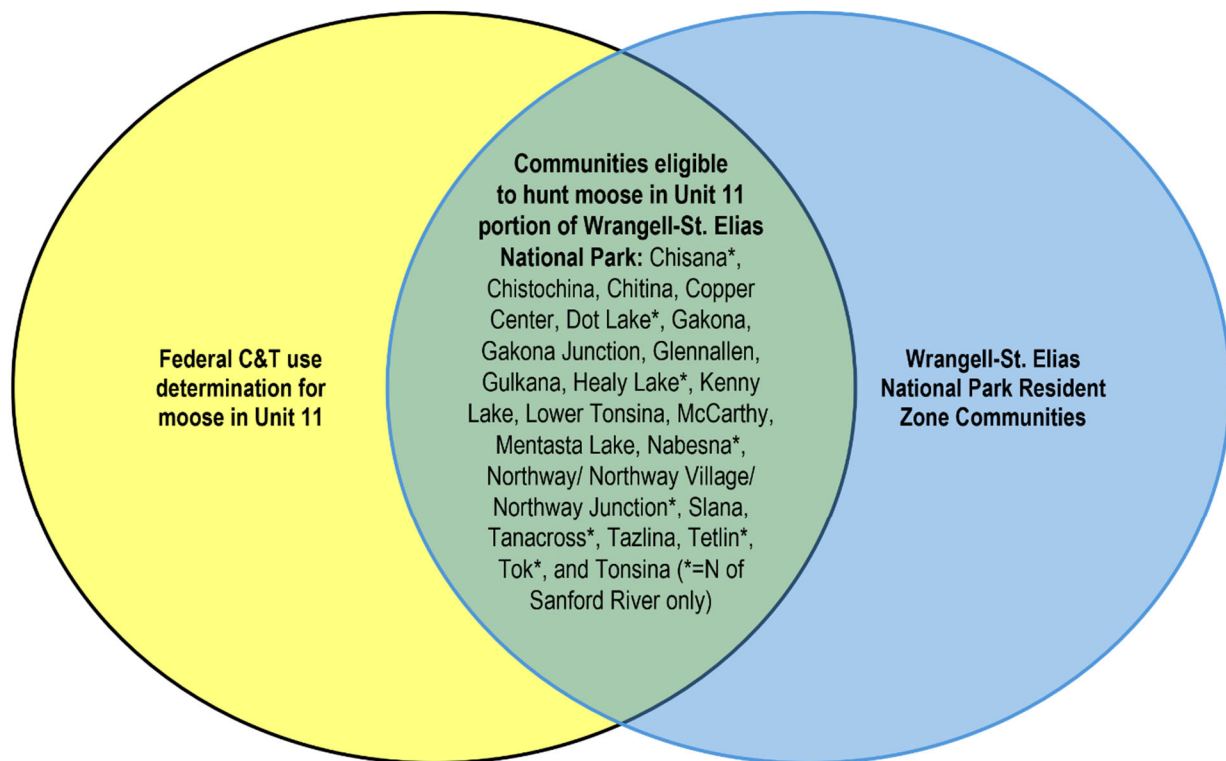


Figure 2: Relationship Between National Park Service and Federal Subsistence Management Program eligibility for hunting moose in Unit 11 under Federal Subsistence Regulations.⁴

Even if a community is in the resident zone, it also needs a C&T use determination for the species in order for its residents to be eligible to hunt in the national park. For example, Dot Lake and Healy Lake, two resident zone communities, have a C&T use determination for Unit 11

⁴ For more information about federal subsistence regulations, refer to the *Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public Lands in Alaska* booklet (<https://www.doi.gov/media/document/wildlife-regulations-book-2024-2026>).

north of the Sanford River only. They would not be eligible to hunt moose south of that boundary under federal subsistence regulations. Both federal regulations and NPS regulations must be followed by the user.

Table 1: Federal Subsistence Customary and Traditional Use Determinations for Tolsona for the Harvest of Wildlife.

Species	Unit 11	Unit 12	Unit 13
Black Bear	No – not a named community or located in Unit 11 or 12	Yes – all rural residents	Yes – all rural residents
Brown bear	No – not a named community or located in Unit 11 or 12	No – not a named community or located in Unit 12	Yes – as residents of Unit 13
Caribou	Yes – as residents of Unit 13A/D	No – not a named community or located in Unit 12	Yes – as residents of Unit 13
Goat	No – not a named community or located in Unit 11	No C&T for Goat in Unit 12	No – Unit 13D – No Federal subsistence priority/No C&T Yes – Unit 13 remainder – All rural residents
Moose	Yes – as residents of Unit 13A/D	No – that portion within Tetlin National Wildlife Refuge and those lands within Wrangell-St. Elias National Preserve north and east of the Pickerel Lake Winter Trail No – that portion east of the Nabesna River and Glacier and south of the Pickerel Lake Winter Trail Yes – Unit 12 Remainder – as residents of Unit 13A/D	Yes – as residents of Unit 13
Sheep	No – not a named community, along a named road segment, or located in Unit 12	No – not a named community or located in Unit 12	No – Unit 13D – No Federal subsistence priority/No C&T Yes – Unit 13 remainder – All rural residents

Source: *Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public Lands in Alaska, 2024-2026.*

Note: Table 1 shows which large land mammal species Tolsona residents are currently eligible to hunt for in Units that span Wrangell-St. Elias National Preserve. If Tolsona is added to the resident zone, residents would also be able to hunt for these species in Wrangell-St. Elias National Park.

Tolsona Residents' Eligibility Under Existing Federal Subsistence Regulations

Currently, Tolsona residents are federally qualified subsistence users whose C&T use determinations for wildlife species are largely based on the location of Tolsona as a community within Units 13A and 13D (see Table 1). Tolsona residents are eligible to harvest most large land mammals in Unit 13 and fewer species in Units 11 and 12. Currently, these C&T use determinations only qualify Tolsona residents to hunt on lands in Wrangell-St. Elias National Preserve; however, if Tolsona is added to the resident zone, its residents could also hunt in Wrangell-St. Elias National Park for the applicable species and area.

It's important to note that these rights are not in question, nor would they be eliminated if Tolsona does not become part of the resident zone.

Process for Evaluating Communities for Eligibility as a Resident Zone Community

Shortly after the signing of ANILCA in December 1980, the NPS initiated a process to determine which communities would be eligible to engage in subsistence uses in Alaska national parks and monuments (see Table 2). In June 1981 (46 FR 31836), the NPS completed a process to designate an initial list of resident zone communities and established criteria for adding communities to or removing communities from the resident zone in 36 CFR 13.430(a) (National Park Service 1981b).

Specifically, the process for adding communities evaluates whether a community contains a significant concentration of current residents with a long-term personal and/or family history or pattern of use of resources in a national *park* for subsistence, with a particular focus on use pre-dating the passage of ANILCA in 1980 (see Table 2). Although past evaluations of communities for resident zone status focused on patterns of use established prior to the designation of the resident zone communities in 1981, the interviews conducted for this analysis also sought to document subsistence uses in Wrangell-St. Elias National Park by newer Tolsona residents when they were living in a resident zone community before moving to Tolsona. If their long-term personal and/or family history or pattern of use in Wrangell-St. Elias National Park for subsistence met the evaluation criteria, it could be considered as contributing to Tolsona's pattern of use for this evaluation.

The geographic scope of the evaluation is the boundaries for Tolsona identified by community members who attended the public hearing in October 2024 (Glenn Highway Miles 159.8 to 176.5), which are broader than those identified by the U.S. Census Bureau (roughly Glenn Highway Miles 165.7 to 173.0). Appendix 2 shows the mile markers between the junction of the Glenn Highway and Richardson Highway and Mile 155 in Mendeltna. This written analysis, which consolidates available information on subsistence activities by Tolsona residents on lands designated as national park, is the first step in the process of evaluating whether Tolsona meets the criteria listed in regulation to be added to the Wrangell-St. Elias National Park resident zone.

Consistent with 36 CFR 13.430, the park provided notice and held a public hearing in the local area to take comments on Tolsona’s request on October 22, 2024. Results of the public hearing are summarized in this analysis.

The Tolsona resident zone request will also be added to the agenda for a meeting of the Wrangell-St. Elias Subsistence Resource Commission (SRC) to seek its recommendation on whether Tolsona meets the criteria listed in regulation to be added to the Wrangell-St. Elias National Park resident zone. The SRC was notified of Tolsona’s request at the March 2024 meeting as an informational item and was given an update at the October 2024 meeting.

Table 2: Steps in Process for Evaluating Communities for Resident Zone Status

- Written analysis of patterns of customary and traditional use in Wrangell-St. Elias National Park (this document)
 - Archival research and literature review
 - Interviews with current Tolsona residents
- Public Notice (completed on October 8, 2024)
- Public hearing (completed on October 22, 2024)
- Subsistence Resource Commission recommendation
- Decision point (Park Superintendent)
- Rule-making and environmental compliance processes (if criteria are met and concurrence of the Regional Director)
 - Proposed rule published in *Federal Register*
 - Public comment period
 - Final rule published in *Federal Register*

After completing this written analysis and taking into consideration the SRC recommendation, the superintendent will make a determination whether Tolsona meets the federal regulatory requirement of containing “significant concentrations of rural residents who, without using aircraft as a means of access for purposes of taking fish or wildlife for subsistence uses... have customarily and traditionally engaged in subsistence uses within” Wrangell-St. Elias National Park (36 CFR 13.430). Consistent with the Congressional intent in ANILCA and current NPS regulations regarding the continuation of subsistence uses, these subsistence uses must have taken place prior to the establishment of Wrangell-St. Elias National Park in 1980 or when a Tolsona resident lived in a resident zone community.

If it is determined that a significant concentration of Tolsona residents demonstrate C&T use within the national park, the NPS could initiate an action to change the current regulation in 36 CFR 13.1902 to add Tolsona to the list of resident zone communities. This process, specified in the Administrative Procedure Act, involves the following steps:

- writing and publishing a draft rule in the *Federal Register* for public comment,
- a 30-to-60-day public comment period, and
- writing and publishing a final rule in the *Federal Register*.

Concurrent with the regulatory change process, the NPS would also undertake the environmental compliance process under the National Environmental Policy Act (NEPA). The NEPA analysis would also include an evaluation of the impacts of the proposed regulation change on subsistence uses and needs under ANILCA Section 810. The outcome of the regulatory change and environmental compliance processes is uncertain, and it would be pre-decisional to state or imply an outcome at this time. If Tolsona meets the criteria to be added to the resident zone, the process would be completed when the final rule is published in the *Federal Register* and the environmental compliance is completed.

Regulatory History

The Resident Zone

National park resident zones are derived from language in Section 201 of ANILCA that authorizes local residents to continue to engage in subsistence uses in national parks and monuments where subsistence uses are authorized. Congressman Morris Udall (D-Arizona) developed the idea prior to ANILCA's passage, defining these zones as "containing concentrations of local residents with established or historical patterns of subsistence use" in a park unit (Bleakley 2002). The goal of the resident zone system was to protect existing subsistence ways of life without burdening local residents with required individual subsistence permits. Congress specifically allowed for the continued practices of subsistence lifestyles on federal public lands, but there is no mention in ANILCA about providing opportunities for new users without historical or established pattern of use of subsistence resources.

The 1979 *Senate Committee Report* that accompanied the Alaska lands bill stated, "with respect to the situation of local residents in and near certain new national parks and monuments established by this Act, Congress believes that the establishment of these units should protect the opportunity for local rural residents to continue to engage in a subsistence way of life" (United States Senate 1979, p. 168). The Committee not only addressed the cultural importance of a subsistence way of life but also its economic necessity for some rural Alaska residents. The *Senate Committee Report* concluded that "there is a need to continue the opportunity for subsistence uses of renewable resources, including wildlife, within certain national parks and monuments by local rural residents who have, or are a member of a family which has, an established or historical pattern of subsistence uses within such units" (p. 169). The report goes on to say that designating resident zones, rather than regulating subsistence hunting via individual permits, has a number of advantages, including most importantly not burdening rural communities with a complex and potentially culturally disruptive system (p. 170).

Establishment of the Wrangell-St. Elias Resident Zone

Antiquities Act and Wrangell-St. Elias National Monument

President Jimmy Carter designated Wrangell-St. Elias National Monument on December 1, 1978, using the authority of the 1906 Antiquities Act. On February 28, 1979, the NPS published an Advanced Notice of Proposed Rulemaking in the *Federal Register* (44 FR 11247) and accepted comments about management of the new national monuments until April 6 (1979a). The NPS received 1,979 letters, mostly form letters except for 248 individual comments (Norris 2002).

The NPS used this input to develop a proposed rule (44 FR 37732) that was published on June 28, 1979, and invited more public comments (1979b). In the proposed rule, the NPS said local rural residents were “judged according to the proximity of their residence to the resource, the degree of the dependence on the resource, and the history of its use,” which included proving the residents’ “history of subsistence activities within the monument as demonstrated by use of fish camps, trapline cabins, hunting camps, cache sites, and other identifiable locations” (Bleakley 2002, p. 125; National Park Service 1979b, p. 37749). More than 200 comments were received by September 26, 1979.

In the proposed rule, the following ten communities were listed as resident zone communities for Wrangell-St. Elias National Monument: Chistochina, Chitina, Copper Center, Gakona, Gulkana, McCarthy, Mentasta Lake, Nabesna, Slana, and Yakutat.

In their 1979 comment on the proposed rule, Jerry and Judy Miller from May Creek wrote:

I would like to see you analyze your designated residential zones. As an example, May Creek is left out which has a permanent resident population and actually exceeds other population centers on that list. Also how about specific geographical definitions of what area each of those listed contains.

Local resident Mark Edward Springer (1979) recommended adding Northway, Northway Village, Tetlin and Tok to the resident zone. The Rural Alaska Association (1979) also recommended adding Glennallen to the resident zone. Local resident Fred Williams (1979) asked why Glennallen was excluded and recommended including “other areas of concentrated residents” such as Copperville, Silver Springs, Lower Tonsina, and Tazlina. In his letter to the NPS, Williams commented that the resident zone communities listed were unincorporated communities, and so, the boundaries between them were vague. Tazlina resident Millie Lewis (1979) asserted that Tazlina Village had been left out of the resident zone, despite its use of subsistence resources. Kenny Lake resident Dean L. Wilson (1979) wrote that Lower Tonsina and Kenny Lake should be added as resident zone communities. For the sake of the current review, it is worth noting that no commenters recommended adding Tolsona during the rulemaking process in 1979.

A final rule was not published since an impending Alaska lands bill (that was later passed as ANILCA) was under consideration by Congress.

1981 Regulation Designating Resident Zone Communities for Alaska National Parks and Monuments

President Carter signed ANILCA on December 2, 1980, establishing Wrangell-St. Elias National Park and Wrangell-St. Elias National Preserve as well as designating or expanding other conservation system units in Alaska. Shortly thereafter the NPS began the process of establishing rules for the new NPS-managed conservation units in Alaska. Proposed interim regulations for the new parks were published in a proposed rule in the *Federal Register* on January 19, 1981 (46 FR 5642, 1981a). In the proposed rule, the same ten communities were listed for Wrangell-St. Elias National Park: Chistochina, Chitina, Copper Center, Gakona, Gulkana, McCarthy, Mentasta Lake, Nabesna, Slana, and Yakutat.

Public comments submitted on the proposed rule included letters and a petition regarding the Wrangell-St. Elias communities. Glennallen resident Michael Lanegan (1981) spearheaded a petition that asked Superintendent Chuck Budge to include Glennallen in the resident zone. Excluding duplicate signatures, around 440 people signed the petition. Not all were from Glennallen; some were from Gakona or Copper Center or Tazlina. It was difficult to decipher whether any of them resided in present-day Tolsona as many listed their post office box address instead of their physical address. Using a list of names of residents around 1980 provided by Clare Jaeger, who was born and raised in Tolsona, park staff were able to find the following likely Tolsona residents signed the petition:

- Graham Ward
- Charles Zimbicki
- Bruno Zimbicki
- Harry Hofstetter
- Joseph Weir

Following publication of the 1981 proposed rule in the *Federal Register*, park staff hosted public meetings in Glennallen, Tok, and Slana, during which they explained the proposed regulations. Alaskans for Alaska (1981) submitted a transcript of the Glennallen meeting to the NPS Alaska Regional Director as a comment on the proposed rule. At that meeting, park staff answered questions about the proposed regulations, including the resident zone and 13,440 permits. In addition to the public meeting, there was a public comment period in which the NPS received letters from local community members. A few years after his 1979 written comment, Fred Williams (1981) wrote another letter expressing support for the addition of Glennallen, stating that “there are as many residents of the Glennallen area that have traditionally and historically hunted in what is now the Park as from any of the resident zones.” Copper Center resident Wilson Potterville (1981) also wrote in support of Glennallen. Glennallen resident Merritt Tegeler (1981) called it “amazing” that Glennallen was overlooked. Another Glennallen resident,

Lee Adler (1981), wrote in that Glennallen and Tazlina should be added and that “there was no difference between the people living” in those villages “than any of the towns listed.” Similar to the recommendation to include Glennallen, the Copper River Native Association (1981) also recommended adding Tazlina and detailed the history of the village. Glennallen was the only community on the Glenn Highway mentioned during the public comment period.

A final rule was published in the *Federal Register* on June 17, 1981 (46 FR 31836) that adopted many comments received during the public comment period (National Park Service 1981b). According to the *Federal Register* notice: “By definition, the ‘resident zone’ for each national park or monument encompasses the area and communities within the park or monument boundaries as well as certain areas and communities just outside the boundaries where, in the judgment of the NPS, significant concentrations of subsistence users of the park or monument reside.” Instead of the initially proposed requirement for “preponderant concentrations of local rural residents who... have customarily and traditionally engaged in subsistence uses within a park area,” the final rule specified “significant” concentrations, clarifying that “the concentrations may be ‘significant’ in relative quantity (e.g., predominant numbers) or quality (e.g., cultural vitality, community leadership and influence).” According to 36 CFR 13.430(a)(2), “For purposes of determining ‘significant’ concentrations, family members shall also be included,” and 36 CFR 13.430(c) defines “family” as “all persons living within a rural resident's household on a permanent basis.”

Although the regulations adopted in 1981 did not define “customarily and traditionally,” as one commenter had suggested, the preamble in the final rule notes that the definition of “subsistence uses” includes the term “customary and traditional” and references language in the *Senate Committee Report* regarding the term. Specifically, the *Senate Committee Report* notes that the phrase “customary and traditional” is intended to describe uses that have played a “long established and important role in the economy and culture of the community and in which such uses incorporate beliefs and customs which have been handed down by word of mouth or example from generation to generation” (United States Senate 1979, p. 269).

Due to the evidence stated in the comments on the proposed rule and from the testimony at the public hearings, the final rule expanded the list of communities in the Wrangell-St. Elias resident zone to include Chisana, Gakona Junction, Glennallen, Kenny Lake, Lower Tonsina, Tazlina, Tok, and Tonsina. In the final rule, the NPS recognized that some local, rural residents might live outside of established communities and so, they encouraged these users to apply for a subsistence permit. This permit would allow for subsistence users not in a resident zone community to continue to engage in subsistence practices in the national park or monument areas (National Park Service 1981b). The subsistence permit operationalized how residents in remote, rural areas who did not live in a community with a significant concentration of users with a pattern of subsistence use could apply for permits under 36 CFR 13.440.

Past Proposed Changes to the Wrangell-St. Elias National Park Resident Zone

The regulations in 36 CFR 13.430 describe a process whereby a community could be added to or removed from the resident zone that includes notifying the public and holding a public hearing. New communities have been added to the resident zone since it was first designated in 1981. Appendix 3 highlights important events in the history of the Wrangell-St. Elias resident zone. The park's administrative history *Contested Ground* (Bleakley 2002) and the Wrangell-St. Elias National Park and Preserve Subsistence Plan (2022) describe the addition of Northway/Northway Village/Northway Junction, Tetlin, Tanacross, Dot Lake, and Healy Lake to the resident zone. Northway, Northway Village, and Tetlin were mentioned in comments on the 1979 proposed rule (Springer 1979). The Wrangell-St. Elias SRC first recommended Northway in 1986 for addition to the resident zone, and then from the mid-1980s until the late 1990s, the other Upper Tanana communities were recommended. During the intervening years, many Upper Tanana residents, especially of Northway, were issued 13.440 permits based on their history of engaging in subsistence uses in the national park. The regulation change that added the Upper Tanana communities to the resident zone was finalized in 2002 (67 FR 8481), bringing the total number of resident zone communities to 23 (see Figure 3).



Figure 3: Current resident zone communities of Wrangell-St. Elias National Park.

Regarding the addition of these Upper Tanana communities to the resident zone, the *Federal Register* notice for the 2001 proposed rule (66 FR 32282) described a long history of Alaska Natives who occupied and harvested resources within the Wrangell-St. Elias National Park area. They were seasonal migrants who moved across and harvested resources over large areas before largely settling in year-round villages in the mid-20th century. The *Federal Register* noted the continued cultural importance of numerous places within the park to the Upper Tanana communities, who still travel there seasonally to harvest subsistence resources.

Not all requests to recognize a resident zone community have been approved, however. Tom Carpenter, the chairman of the Copper River/Prince William Sound Advisory Committee, sent a letter to then-Superintendent Jon Jarvis in March 1998 requesting a history for why Cordova was not given resident zone community status and asking about the steps needed to be designated as a resident zone community. Park staff prepared a document titled “Information Regarding the History of Cordova to the Resident Zone for Wrangell-St. Elias National Park and Preserve” for a November 1998 SRC meeting. That report cited research by Stephen A. McNeary from 1977, which stated that few residents of Cordova customarily and traditionally used the park area for subsistence. “A few fly to the Wrangells to hunt sheep or to Icy Bay for goats but due to the distances and expense involved they cannot be considered local hunters,” the report stated (National Park Service 2022; McNeary 1978, p. 30-37). In September 1999, park and Federal Subsistence Board staff held a public meeting in Cordova to “provide residents of Cordova an opportunity to demonstrate their customary and traditional use of subsistence resources in the Wrangell-St. Elias National Park prior to the establishment of the park in 1980, without use of aircraft to access” (Sharp 1999). After speaking to 15 attendees of this public meeting (out of 2,110 Cordova residents at the time), only five filled out 13,440 permit applications. No permits were issued. At the February 2000 SRC meeting, the Commission supported the park’s conclusion that Cordova did not have a significant concentration of residents with a history of subsistence use in the park without the use of aircraft prior to 1980.

History of Tolsona Resident Zone Requests

Appendix 4 illustrates the history of requests from Tolsona to be recognized as a resident zone community for Wrangell-St. Elias National Park. The Tolsona Community Corporation first requested designation of Tolsona as a resident zone community in April 1999. Graham Ward, the president of the Tolsona Community Corporation, sent a letter to the chair of the Wrangell-St. Elias SRC asking to be added to the resident zone. He wrote, “whereas the residents of Tolsona are primarily part of Glennallen in so far as voting, school attendance, banking, post office boxes, fuel purchase, and employment, etc, we hereby urgently request to be [sic] as a Resident Zone Community for all subsistence species resources in the park” (Ward 1999a).

Then-SRC Chair John Vale (1999) responded that the SRC agreed to consider the request and asked for more information about the community. He invited Tolsona residents to attend the next SRC meeting in November 1999 and requested the following information: the number of residents in the community, the history of the community, and the history of the residents’ use of

subsistence resources in the park prior to 1980. He also encouraged residents to apply for 13.440 permits because Tolsona’s status as a resident zone community was undecided. By applying for this permit, residents could “insure [sic] their rights to subsistence harvest in Wrangell-St. Elias National Park” (Vale 1999).

Later that year, Ward replied that “rather than pursue the issue at this time, perhaps it is better to continue to think of ourselves as residents of Glennallen as we always have in the past” (Ward 1999b). He claimed proof of their hunting history would be hard to provide and that they lacked the time to gather the information requested. At the time of this initial request, the western boundary for the U.S. Census Bureau’s Glennallen Census Designated Place was Mile 180 of the Glenn Highway (U.S. Census Bureau 2002).

In August 2003, a Tolsona resident contacted the park to apply for a 13.440 subsistence permit. A park staff member called the applicant and discovered that he did not have any history of using the park prior to 1980. The staff member then wrote on their notes, “Tolsona is going to ask to be a rez [resident] community” (Sharp 2003). No request was received.

During summer 2023, two Tolsona residents came on separate occasions to the park visitor center in Copper Center to apply for federal subsistence moose permits for a portion of Unit 11 (FM1106). These residents were eligible for this permit, but only to hunt in the preserve portion of the Unit because residents of Unit 13A and 13D have a C&T use determination for moose in Unit 11. However, both Tolsona residents wanted to hunt in the national park. Through emails, phone calls, and in-person discussions, they were informed about the NPS regulation of the resident zone (36 CFR 13.430). Subsequently a formal written request for consideration as a resident zone community was received by the park superintendent from Jason Somerville, president of the Tolsona Community Corporation, in January 2024 (Appendix 1).

In the letter, Tolsona Community Corporation described the Tolsona community and that while Tolsona has long been an individually named place along the Glenn Highway, the community has strong socioeconomic ties to Glennallen. These ties between Tolsona and Glennallen extend to subsistence practices, such as joint hunting trips and subsistence food sharing. Residents share resources such as black bear, brown bear, goat, moose, sheep, and fish. The proponent went on to state that because Tolsona is a remote roadside community, the social, cultural, economic, and nutritional uses of these resources are integral to their identity. To demonstrate the importance of the national park to the broader subsistence lifeway in Tolsona, the request concluded with a list of Tolsona residents who previously harvested subsistence resources in or near the national park. This list of residents is addressed later on in this analysis under the section titled “Tolsona Resident Interviews.”

Tolsona Community Profile

The community of Tolsona takes its name from a nearby geographic feature, whose name—in turn—reflects a traditional Indigenous name as it was written down by early explorers. Tolsona Creek was first mentioned in a USGS publication in 1915 (Brooks et al. 1915, p. 124; Orth 1971,

p. 974). According to the 2014 version of James Kari's Ahtna Place Names Lists, the Ahtna name for the creek is Taltsogh Na', meaning yellow water creek.⁵ There are several other Ahtna place names in the Tolsona area. For the area discussed in this analysis (Mile 159.8 to Mile 176.5), these places include Tolsona Volcano (Bes Nilaeni), Soup Lake (Ben Defts'aeggi), Little Woods Creek (Hwts'inat'aani Na'), Moose Lake (Sitelyaa Bene'), a creek into Tolsona Lake (Uk'ec'elt'oxi Na'), and Tolsona Lake (Uk'ec'elt'oxi Bene') (Smith and Kari 2023). Tolsona is not listed as a place in Kari's *Ahtna Travel Narratives* (2010).

Some of the first homesteaders in the area included the three Zimbicki brothers, who built their homestead on Tolsona Creek in the 1940s (U.S. Census 1950). During a phone call with park staff, a current resident said the Zimbicki brothers hunted, fished, and trapped all over the Copper Basin, and in particular, hunted sheep in the park. However, none of the brothers had any children, and no current family members live in Tolsona. Hunting as part of guiding operations had been mentioned by several former and current Tolsona residents. Guiding operations ended when the monument was established in 1978.

The U.S. Department of Commerce, Bureau of the Census, conducted the 1950 Census of Population and Housing in Alaska, which documented heads of households and information about family members over 14 years old. The recording district was Chitina, and the enumerator separated out Glenn Highway and Tolsona Creek from Glennallen (which ended at Mile 182 in the 1950 census). At places along the Glenn Highway, families were documented from Mile 150 to Atlasta House (approx. Mile 165-166). At Tolsona Creek (Mile 172), seven households were documented as well as construction workers living in a road construction camp. All the documented household heads were born outside of Alaska and were non-Native (U.S. Census Bureau 1950).

Several USGS maps show the changes in population density in the Tolsona area through time:

- A 1949 map shows Tolsona Lake with one cabin at the end of what is now Tolsona Lake Road at Mile 170 on the Glenn Highway, and two cabins on the north end of the lake. Around Mile 165, there appears to be around six cabins surrounding Atlasta House, a lodge that is now a private residence (USGS 1949).
- A 1951 map shows one cabin at Tolsona Lake and four cabins at Atlasta House (USGS 1951).
- A 1965 map shows one cabin at the south end of Tolsona Lake and two on the north, three cabins at Tolsona Creek, two cabins near Little Woods Creek, one cabin on Soup Lake, and two at Atlasta House (USGS 1965).

In *The Glenn Highway: The Story of its Past, a Guide to its Present* (Cracraft 1987), Tolsona Creek is named as a location on a map published for visitor usage, however Tolsona is not

⁵ Orth (1971, p. 974) describes the origin of the name Tolsona Lake as a local name published in 1951 by USGS.

named as a community. There is an ad for Tolsona Lake Resort, which is now Tolsona Lake Lodge.

Glennallen, but not Tolsona, is listed as a community in a 1973 report prepared by Ahtna, Inc. and the Arctic Environmental Information and Data Center. The report lists the Ahtna region as “the entire drainage of the Copper River, including Chitina, the Chistochina, the Tazlina, and several other rivers. It includes the Copper River lowland, the Gulkana upland, and the Lake Louise plateau. It extends into the Alaska Range to the northeast (Mentasta Lake) and to the northwest (Cantwell). It includes the Wrangell Mountain Range and much of the Chugach Mountains. To the west, Talkeetna Mountains border the region” (1973, p. 12). The Tolsona Mud Volcano at Mile 174 is listed in a section on mineral resources, while Tolsona Lake appears as a location for a floatplane service (Ahtna, Inc. 1973, pp. 34 and 106).

After reviewing 4,127 documents in the National Archives regarding the creation of Wrangell-St. Elias National Monument and later National Park, including comments on the 1979 and 1981 rulemaking packages for Alaska NPS lands, only one mention of Tolsona appears in an October 1973 document called “Community Profiles in Alaska for the Joint Federal-State Land Use Planning Commission for Alaska.” Tolsona is mentioned as a place name under “other localities and place names in the [Ahtna] area” (Patterson 1973, p. 5). It is not named on the map on the following page, although Glennallen is.

It is difficult to find historical population information for Tolsona, because it was not designated as a Census Designated Place by the U.S. Census Bureau until 2000 nor was it part of any other Census Designated Places prior to that date. The 1950 Census indicated a small community living around Tolsona Creek and along the Glenn Highway; records past 1950 have not been unsealed. Due to the small numbers of people living along the Glenn Highway, subsistence surveys from the 1980s listed residents of the area with the nearby communities of Mendeltna and Nelchina and reported their combined data as “East Glenn Highway.” A Mendeltna resident said at that time, residents would say they lived on the Glenn Highway. He said, “It was defined where you met up with other people and that was about it. You live on Tolsona Lake; you live on the Glenn Highway. No distinction in my mind.”

An Eagle River resident who was born, raised, and lived most of their life in Tolsona said around 30 people lived in Tolsona prior to 1980. A Palmer resident who moved to Tolsona in 1965 and left in the early 1990s described the area as sparsely populated. They described a few cabins around the lake, though some were seasonally occupied. A 1983 Alaska Department of Fish and Game (ADF&G) Division of Subsistence harvest assessment estimated that 182 people in 65 households lived in the East Glenn Highway area, describing the households as “residing in a dispersed pattern along this 43-mile stretch [Tolsona, Mendeltna, Nelchina] of the Glenn Highway” (Stratton and Georgette 1984, p. 70; Fall 1985). Table 3 shows recent population estimates from various sources.

Table 3: Recent Population Estimates for Tolsona.

Estimated Population	Geographic Area included in Estimate	Year	Source
24	Tolsona Census Designated Place	2013	ADF&G Division of Subsistence (Holen et al. 2015, p. 479)
12	Tolsona Census Designated Place	2020	U.S. Census, April 2020
42	Glenn Highway Miles 159.8 to 176.5	2022	Tolsona Community Corporation president citing a 2022 census the corporation conducted
11	Tolsona Census Designated Place	2024	Alaska Department of Labor and Workforce Development, 2024
30 (half seasonal)	Glenn Highway Miles 166 to 176	2024	45-year Tolsona resident

Though Tolsona is not specifically mentioned in the 1983 ADF&G study, the neighboring community of Mendeltna was. Called Bendilna’ in Ahtna, it was “an important, upland settlement” (Stratton and Georgette 1984, p. 69). Residents of Mendeltna fished for salmon in the nearby Mendeltna Creek and hunted sheep and caribou in the Chugach Mountains. An estimated 20 to 30 people had been killed by disease in the early 20th century. At the time of the survey, only one descendent family remained. Other nearby Native settlements, Tazlina Lake and Old Man Lake, were also decimated by an influenza outbreak in the early 20th century.

Stratton and Georgette summarized that the East Glenn Highway communities “exhibited a variety of resource use patterns ranging from households employed year-round with little time to participate in harvest activities to guides who locally distributed meat left by clients” (1984, p. 71). They described the communities as dispersed and heterogeneous. While they commented on the use of the Copper River fishery by the residents, there was no mention of using lands that had recently been designated as Wrangell-St. Elias National Park for subsistence activities.

Discussion on Tolsona and Glennallen

As part of the analysis, park staff interviewed several current and former Tolsona residents over the phone and in person to document their history and pattern of use of subsistence resources in the national park and to gain a deeper understanding of the community history. According to former Tolsona resident Clare Jaeger’s testimony during the public hearing and in a written comment sent to the park, the community corporation was established in 1989 in order to create a local landfill. She wrote, “We consider ourselves residents of Glennallen. To this day, if someone asks me where I grew up, I answer with Glennallen, Alaska. Why would anyone say they live in ‘Tolsona Community Corporation,’ which is a non-profit agency that files a non-profit tax return?”

Some other residents both past and present stated that Tolsona considered itself part of Glennallen. They said Tolsona’s zip code was Glennallen’s, their mailing address listed

Glennallen, and there are no services in Tolsona that would allow it to be an independent municipality. However, the Tolsona Community Corporation stated in their written letter to the park superintendent that Tolsona had been a named place for countless generations and that the State of Alaska had recognized Tolsona as a community in the 1980s (Somerville 2024).

There are other indications that Glennallen and Tolsona are separate communities. The western boundary of the Glennallen Census Designated Place had been Mile 180 prior to 2000 and the Alaska Department of Transportation boundary markers for Tolsona extend from Miles 160.5 to 176 on the Glenn Highway. Other communities also have the Glennallen zip code, including some that are not in the resident zone, such as Lake Louise, Nelchina, and Mendeltna; and some that are in the resident zone, like Gulkana and Tazlina. These communities are separate from Glennallen.

After the passage of ANILCA and the creation of Wrangell-St. Elias National Park and Wrangell-St. Elias National Preserve, residents along the highway were spread out and sparse. The 1981 final rule addressed the issue of residents who may live outside of an established community:

The availability of subsistence permits assures that subsistence users whose communities are not included in a resident zone for whatever reason may nevertheless have the opportunity to engage in subsistence uses in national park or monument areas (National Park Service 1981b, p. 31841).

Since the creation of the Tolsona Census Designated Place in 2000, the U.S. Census Bureau has considered Tolsona to be a community. Prior to that time, the Tolsona area was not included in any census designated places. It was not part of the Glennallen Census Designated Place when the Wrangell-St. Elias resident zone was established in 1981 as the western boundary for Glennallen had been Mile 180 on the Glenn Highway.

Although there are not currently any federal subsistence C&T use determinations specific to Tolsona (existing C&T use determinations in Table 1 are for broader regions, i.e., residents of Unit 13), the Federal Subsistence Board recognized Tolsona in an ANILCA Section 804 user prioritization analysis for Nelchina caribou at its February 2025 meeting and voted down two proposals to recognize Tolsona's C&T use of salmon in the Chitina Subdistrict of the Upper Copper River and of freshwater fish in the Copper River drainage upstream of Haley Creek. The Board opposed the proposals, consistent with the recommendations of the Southcentral and Eastern Interior Regional Advisory Councils, which cited a lack of evidence that the community demonstrated C&T use as evaluated using the eight factors.

In addition to the U.S. Census Bureau recognition as a Census Designated Place starting with the 2000 census, several State of Alaska agencies recognized Tolsona as an unincorporated community separate from Glennallen after 1980. Along with the official Alaska Department of Transportation and Public Facility signs, the ADF&G Division of Subsistence has conducted community harvest surveys of Tolsona, as a community separate from Glennallen, since the

early 1980s. These surveys are important for both state and federal boards that make decisions about the harvest of fish and wildlife. The Alaska Department of Commerce, Community and Economic Development has provided funding to the Tolsona Community Corporation through its community assistance program for unincorporated communities. When the State of Alaska was managing for a rural subsistence priority under ANILCA in the 1980s, the Alaska Board of Game adopted a C&T use determination for sheep in Unit 11 that recognized Glennallen as an eligible community and specifically stated “NO SUBSISTENCE” for several locations including “east Glenn Highway (milepost 110-180).” After the Federal Subsistence Management Program was established following the McDowell Decision, this same C&T use determination (including the “NO SUBSISTENCE” language) was adopted directly into federal subsistence regulations. In a 2024 letter sent to the park superintendent, the Tolsona Community Corporation president stated that “Tolsona has extremely strong ties to Glennallen as do all other communities” (Somerville 2024).

Although some Tolsona residents identify with the regional hub community of Glennallen, others clearly identify Tolsona as a community separate from Glennallen, and both state and federal agencies identify Tolsona as being separate from Glennallen. At this point in time, Tolsona is a separate community from Glennallen.

Customary and Traditional Usage of National Park Lands

In order to understand whether Tolsona contains a significant concentration of residents with a long-term personal or family history or pattern of subsistence use in the national park, park staff first conducted the archival research described in this analysis. Park staff reviewed all 126 13.440 permit applications received between 1981 and 2023, and none was submitted by a Tolsona resident. One Tolsona resident was interviewed over the phone by park staff in 2003, but since they did not have a history hunting in the park, they did not officially apply for a permit. Another Tolsona resident applied for a permit in 2024, however, the application lacked evidence of long-term personal or family use of Wrangell-St. Elias National Park for subsistence. That application, as of the time of this writing, is on hold, and no permit has been issued.

Holly Reckord’s *That’s the Way We Live* documented Native and non-Native subsistence in Copper Basin in the late 1970s. One mention of Tolsona exists in reference to households around the lake:

The bush (plane-oriented) society articulates with the larger society of roadside communities such as Chitina, Duffy’s Tavern, or Tolsona Lake, where airstrips, lakes for float planes, and friends with an interest in the bush community are found (Reckord 1983, p. 203).

There is no other mention of Tolsona or use of resources in Wrangell-St. Elias National Park by its residents in the report.

A critical source of information about subsistence use comes from harvest assessments conducted by the ADF&G Division of Subsistence. As stated previously, household surveys had been conducted for the area referred to as East Glenn Highway, the combined communities of Tolsona, Mendeltna, and Nelchina, in 1982 and 1987. ADF&G did not aggregate the data for these communities in 2013, and so there is data on Tolsona residents’ use of subsistence resources. In 2013, the research team surveyed 8 out of 12 households in Tolsona. No household surveyed identified as Alaska Native, and only one of the household heads was born in Alaska (in Fairbanks). None of the household heads said their parents lived in Tolsona at the time of their (i.e., the survey respondents’) birth. In fact, 75% of the Tolsona residents surveyed were born outside of Alaska and only 13% of the residents had parents who lived in Tolsona when the resident was born. Most of the adults in surveyed households moved to Tolsona after childhood, and “intergenerational presence in the area is extremely limited” (Holen et al. 2015, p. 480).

The harvest assessment found that Tolsona residents are active participants in subsistence harvesting and processing activities (see Table 4). At least half of the members of surveyed households participated in the harvest and processing of large land mammals, fish, and plants, while a smaller proportion harvested and processed birds, eggs, and small land mammals. Ninety-three percent of members of surveyed Tolsona households participated in harvesting activities, and all members of surveyed households processed subsistence resources. These high rates of participation in subsistence activities support the idea that subsistence is extremely important to the Tolsona community.

Table 4: Individual participation in subsistence harvesting and processing activities by Tolsona residents, 2013.

Wild resource category	Participation in subsistence harvesting activities (percentage of residents)	Participation in subsistence processing activities (percentage of residents)
Any Resource	93.8%	100.0%
Plants	81.3%	87.5%
Fish	75.0%	87.5%
Large Land Mammals	50.0%	50.0%
Birds and Eggs	31.3%	37.5%
Small Land Mammals	6.3%	6.3%

Source: Holen et al 2015, pp. 488.

All Tolsona households surveyed also used subsistence resources in 2013. Large land mammals made up 37% by weight of Tolsona residents’ harvest that year, an estimated 116.1 lbs. per capita (note that this differs from Table 5 as it is Tolsona by itself, not the three combined communities of East Glenn Highway). Sharing was an important activity in Tolsona as all households received resources, and 75% of households gave resources away in 2013 (Holen et al. 2015, pp. 489, 492, and 498).

The first harvest survey conducted in the Tolsona area was in 1982 with a second survey in 1987. In these two surveys, Tolsona was one of three communities that made up East Glenn Highway and the study unit extended from Mile 137 to Mile 180 of the Glenn Highway. Comparatively, the 2013 study ended the Tolsona study unit at Mile 173 of the Glenn Highway as the Census Designated Place boundary for Glennallen had changed to that mile marker in 2000. Table 5 summarizes wild resource harvest by and estimated population of the East Glenn Highway area for each of these study years.

Residents along the East Glenn Highway heavily relied on three resource categories throughout the different study periods: large land mammals, salmon, and non-salmon fish. Moose and caribou were consistently the two large land mammal species that area residents most commonly attempted to harvest.

Table 5: Estimated wild resource harvests by and population of East Glenn Highway communities (Nelchina, Mendeltna, and Tolsona), 1982, 1987, and 2013.

	1982	1987	2013
Population	182	217	133
Total harvest per capita (lbs.)	153.3	132.4	142.1
Large land mammal harvest per capita (lbs.)	50.2	43.8	66.2
Small land mammal harvest per capita (lbs.)	12.4	0.7	0.4
Birds and eggs harvest per capita (lbs.)	1.2	2.1	0.7
Vegetation harvest per capita (lbs.)	10.0	2.9	9.9
Salmon harvest per capita (lbs.)	48.6	72.4	45.1
Non-salmon fish harvest per capita (lbs.)	30.9	9.9	14.8

Sources: Holen et al. 2015, pp. 522-523.

The ADF&G Division of Subsistence collects spatial data when conducting harvest assessments in order to understand where communities search for and harvest wild resources. Very limited spatial data were collected in the 1982 and 1987 survey years, but the 2013 harvest assessment described maps from a separate study that spanned from 1964 to 1984. The data for the East Glenn Highway was collected from 15 households from Mile 121 to Mile 180. The East Glenn residents at the time searched and harvested resources within the boundaries of Wrangell-St. Elias National Park, as well as Wrangell-St. Elias National Preserve. In Wrangell-St. Elias National Park, residents searched and harvested for moose along the south bank of the Chitina River, along the Klawasi River, south of Tanada Creek, and on the Tana River. They searched for and harvested for caribou west of Drop Creek; other search and harvest locations for caribou were in the preserve. They searched for and harvested sheep on Nathlie Mountain (near the Sanford Glacier) and near Sheep Lake (near Nabesna) (Alaska Department of Fish and Game 1985).

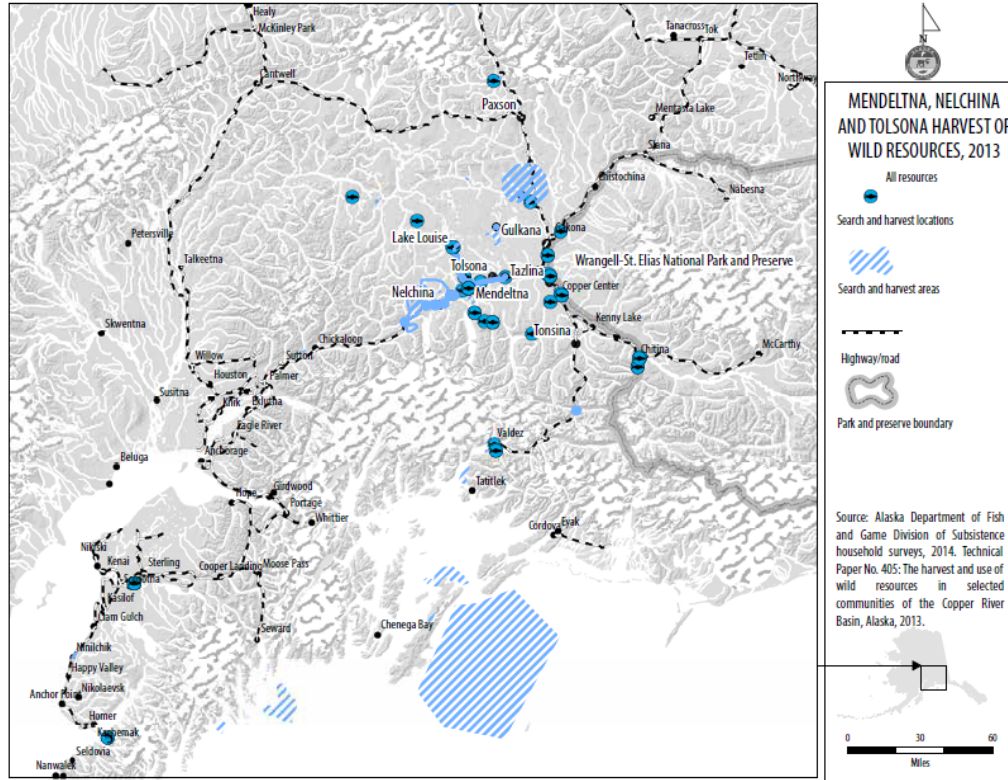


Figure 4: 2013 East Glenn Highway search and harvest areas for wild resources.

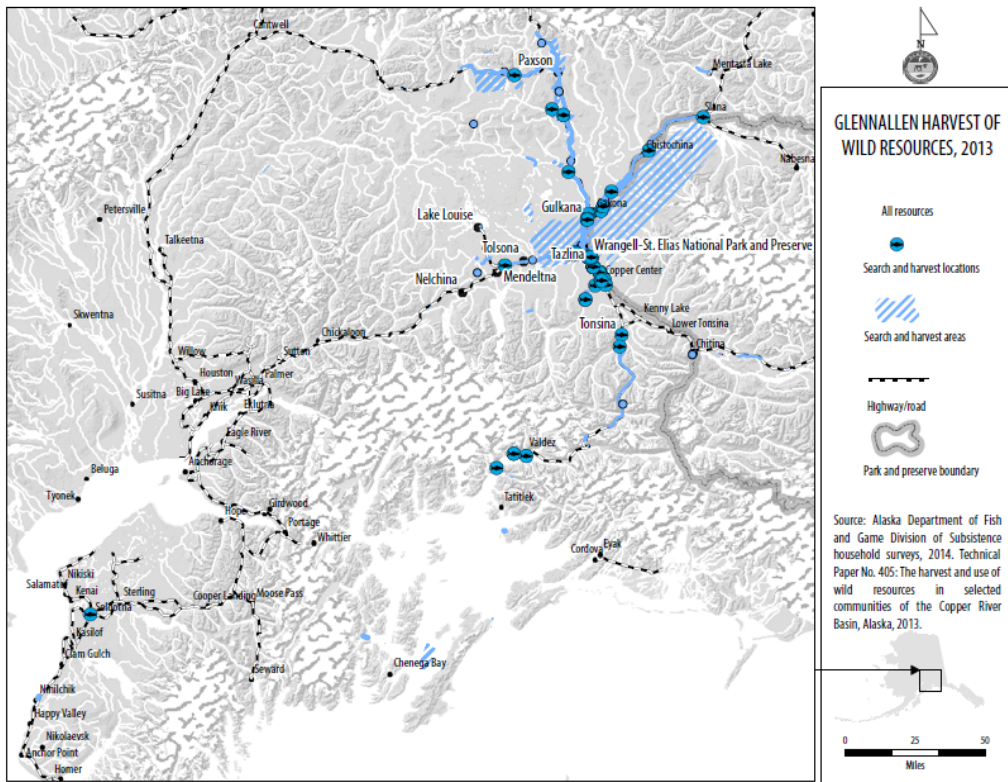


Figure 5: 2013 Glennallen search and harvest areas for wild resources.

As described in the study, “many of these areas are east of the 2013 moose search and harvest areas” (Holen et al. 2015, p. 528). In 2013, search and harvest areas were mostly along the road system, in particular along the Richardson Highway from Sourdough to Valdez and along the Glenn Highway from Eureka to Glennallen (Holen et a. 2015, p. 526-528). Although the maps for the 2013 survey again combine the East Glenn Highway communities, no search or harvest areas within Wrangell-St. Elias National Park—or Preserve—were identified by survey respondents (see Figure 4).

Figure 4 shows the search and harvest areas for Tolsona, Mendeltna, and Nelchina (East Glenn Highway). The establishment of Wrangell-St. Elias National Park could have played a role in moving the hunting west, though residents of the East Glenn Highway remained eligible to hunt in Wrangell-St. Elias National Preserve. The neighboring community of Glennallen, in comparison, has a wide search and harvest area for wild resources in the national park and national preserve (Figure 5). These data suggest a continued subsistence use of park and preserve lands among Glennallen residents.

Regarding large land mammals, Tolsona residents reported concerns about state hunting regulations in Unit 13, in general, and with the Copper Basin Moose Community Subsistence Harvest Permit Program (Community Subsistence Harvest), in particular. Residents of the Tolsona area claimed the Community Subsistence Harvest increased hunting pressure from outside, non-rural hunters. Some Tolsona households said in the survey that they preferred and relied on hunting in areas governed by the federal subsistence regulations because those areas provided a rural preference (Holen et al. 2015, pp. 539-540).

Another source of information about the extent to which Tolsona residents have hunted in recent years in Wrangell-St. Elias National Preserve is federal subsistence permits. Since 2002, eight Tolsona residents have been issued a total of 15 federal subsistence FM1106 permits for Unit 11.⁶ Two of the eight Tolsona residents live inside the boundaries of the Glennallen Census Designated Place; one had been issued a permit in 2010 and 2024, and the other in 2024. One Tolsona resident has consistently been issued a permit for the past four years (2021-2024). One moose has been harvested by a Tolsona resident under the federal permit for Unit 11 remainder.

Tolsona Resident Interviews

As part of their 2024 letter, the Tolsona Community Corporation provided names of 12 people who Tolsona Community Corporation stated had hunted and conducted other subsistence activities in Wrangell-St. Elias National Park. Of those 12 people, 3 people hunted in the park after 1980 and not while living in a resident zone community, and 6 people were deceased without descendants living in Tolsona. One current resident only had fishing activities

⁶ Until 2011, the so-called FM1106 moose permit was valid for all federal public lands in Unit 11. Beginning in 2012, a new joint state- federal permit was created for the north part of the Unit (RM291), and the FM1106 permit became valid only in Unit 11 remainder.

documented, not hunting in the national park. The other two were contacted by park staff, although both no longer lived in Tolsona.

After reviewing the request letter and contacting the people listed by Tolsona Community Corporation, NPS staff asked the Tolsona Community Corporation names of current residents who had, prior to 1980, customarily and traditionally hunted in the national park without the use of aircraft. Four additional names were provided by the Tolsona Community Corporation, though three were not current residents.

The NPS staff then sought other contacts through a snowball sampling method, in which, at the completion of an interview, interview participants were asked for names of other people who might have a history of subsistence uses in the Wrangell-St. Elias National Park. Park staff then followed up with those contacts and scheduled interviews if the contacts were interested. Interviews took place over the phone and in person. When in person and when applicable, interviews included mapping subsistence activity locations in Wrangell-St. Elias National Park. Although the community harvest assessments conducted by ADF&G collect information based on Census Designated Place boundaries at the time of the surveys, the interviews the park conducted for this analysis included residents of the larger geographic area that the Tolsona Community Corporation identifies, including a few households who live in the Glennallen Census Designated Place and thus are currently considered residents of the park's resident zone.

In the interview summaries that follow, people interviewed are identified by letter to protect their privacy. Twenty former and current residents were contacted for interviews for this analysis, and 16 of them participated in interviews. Three residents reported engaging in subsistence activities in the national park that were not authorized under current NPS regulations; those activities are therefore not included in this analysis. The following paragraphs summarize Tolsona residents who have provided testimony about their Wrangell-St. Elias National Park subsistence activities before 1980 or when living in a resident zone community. Locations are in the national park unless specified otherwise.

Current Residents

Current Resident A moved to Tolsona in the late 1970s and had hunted in the national park since 1977. He harvested four bison near the Upper Dadina, hunted moose in the park, and hunted birds, in particular, grouse. He used to guide fishermen in the park and said he “fishes in the park privately” at Summit Lake, Copper Lake, and Tebay Lake. He gathered blueberries, salmonberries, cranberries, and crowberries. While he said he had years where at least 70% of his meat had come from the park, now he was “not as young as he used to be.” He also primarily used aircraft for access. He said most of the people who lived in Tolsona when he moved there have since left or are deceased. He was concerned that the proponents for this request did not have a historical use of the park, and he preferred an individual basis for subsistence eligibility rather than make Tolsona a resident zone community. In terms of the request, he said, “You can't take something away from people who hasn't had it.”

Current Resident B has lived in Alaska for nine years. He moved to the Copper Basin in 2019 and lived in Tazlina and Copper Center before moving to Tolsona in 2021. While living in a resident zone community, he hunted in the national park in 2020 and 2021. He primarily hunted off the Copper Lake Trail for moose and sheep. He said that the goal of the Tolsona resident zone request was to protect resources while allowing for Tolsona residents to engage in subsistence activities in the national park.

Current Residents C and D lived in Tazlina for 33 years and in Tolsona for 5 years. Resident C moved to the Copper Basin in 1983, while Resident D's family moved to the Copper Basin in 1968. Resident D's family last hunted in the park in the late 1970s or early 1980s. They generally hunted caribou, though they also hunted bison. The last time Resident D hunted in the park was 1982, at the base of Mount Drum. This was because their main method of transport had been airplane, which was not consistent with the definition of customary and traditional use in ANILCA. Resident D said, "there was a bad taste in the community [Tazlina] about the park." Resident C hunted grouse along the McCarthy Road and fished for rainbow trout in Silver Lake (national preserve), generally in the 1980s. Neither gathered plants in Wrangell-St. Elias National Park. When Resident C was on the McCarthy Road for work, he would pick berries along the road down to the Kuskulana Bridge. Currently, they hunt off the pipeline in Unit 13 for moose as it is "more in their backyard." They said moose came straight through their property and that they used the state land that went back to Tazlina Lake.

Current Resident E has lived in Tolsona near Moose Lake for 30 years, since the early 1990s. She came to the Copper Basin in 1981 from Chugiak, and lived in Tazlina, Kenny Lake, and Willow Lake before moving to Tolsona. She hunted for moose and sheep along the Kotsina Trail from 1982 to 1990. She also hunted moose along the Nabesna Road, although she could not recall a specific location. She and her former husband would go ice fishing for burbot in Silver Lake and in the Strelna area (national preserve). Generally, she and her former husband would use a highway vehicle to reach their harvest locations. She said the earliest year she went out hunting was 1981 and the last year was 1995. When asked about the frequency of use, she said, "for a bit, it was every year, and then we moved out to Tolsona and didn't go up that way as much." After moving out to Tolsona and beginning to raise a family, it became easier to hunt closer to their home. Resident E stated that while she did not hunt anymore, "other people should have the right" to hunt in the national park.

Current Resident F has lived in Tolsona since 2005. He moved to Alaska in 1997 and to Tolsona in 2001. He lived there for four years before moving to Tolsona. With a friend who lived off Silver Lake, he would go down to Nugget Creek for moose. He learned about the federal permit from word of mouth. When he moved to Tolsona, he was no longer eligible to hunt in the Nugget Creek area—which is in the national park—and so he went to Tangle Lakes (in Unit 13). He has hunted small game and grouse along the McCarthy Road and up Nugget Creek Trail. He has fished in Silver Lake, Strelna Lake, and Long Lake (all in the national preserve). It had been about six years since he had been in the park for subsistence use, and he said he mostly hunted and fished in the park opportunistically.

Current Residents H and I, a couple, have lived in Tolsona since 1991. Resident H moved to the Glennallen area from the Lower 48 in 1979. He recalled early opposition to the creation of the park and preserve among locals when he first arrived. He began hunting in 1980 once he met the State of Alaska residency requirements. In the early 1980s, he hunted grouse and picked berries along the McCarthy Road. He hunted sheep in the preserve and once with a friend in the park. He hunted moose and caribou in various areas within the park and preserve during the early 1980s while a resident of Glennallen. After 1985, he quit hunting in the preserve because he was unsure of his eligibility to continue to do so, opting instead to hunt in Unit 13. Resident H accessed all his hunting areas by hiking in from the road, never by airplane or off-road vehicles. Resident I moved to Alaska in 1986. Though she did not typically accompany Resident H while hunting, she always helped process game. The couple observed that Tolsona is now comprised of “old timers” and “new timers,” and Resident I verbally listed everyone in the community she could think of beginning at the western boundary of Tolsona (the Lake Louise cutoff at Mile 159) and working toward Mile 176 (most of whom NPS staff had contacted or attempted to contact). The old homesteads were not as occupied, while people have moved into newer locations along and off the highway.

Former Residents

Former Resident J was born in New York State and came to Alaska to attend the University of Alaska Fairbanks. She and her husband moved to their homestead in Tolsona in 1965. At the time, two families and a few cabins were around Tolsona Lake. She said the cabins were seasonally occupied. Because she left Tolsona in the 1990s, she was unsure what she would say the boundaries were, but stated that back then, “if you asked someone where you lived, they’d said Tolsona and not Glennallen, 17, 18 miles away.” She also differentiated that “if you didn’t live in Mendeltna, you lived in Tolsona.” She and her husband used an airplane to reach the lakes in the park, as well as the Chitina Glacier, the Nabesna Glacier, Chisana, and Chelle Lake. They also fished at Tebay (where they had property) and Summit Lakes. While she has been away for 24 years, her kids return to Tolsona in the summer for recreation.

Former Resident K was born in 1952 and raised in Tolsona. Her family settled in Tolsona in the 1940s. She said, “anything about subsistence, I lived.” She said Tolsona was recognized as part of the greater Glennallen area at the time that Wrangell-Saint Elias Park and Preserve was created in 1980. In the late 1980s, the Alaska Department of Environmental Conservation (ADEC) began to enforce rules about “illegal dumping.” The ADEC pushed the formation of local non-profit corporations to manage solid waste, otherwise local residents could be prosecuted for the disposal of trash on state land. The ADEC worked with interested communities, and they defined boundaries for Tolsona to be approximately Mile 160 to Mile 176 of the Glenn Highway. She stated that even after she was married in 1971, they were going to Nabesna and McCarthy every year. She would go to McCarthy in the winter. They hunted rabbits in the winter and moose in the fall. She hunted in Tonsina, Chitina to McCarthy, and Nabesna. She still owns numerous properties in Tolsona and at Crosswind Lake which she uses at least monthly. She currently claims Eagle River as her permanent residence.

Former Resident L was contacted by email. She hunted sheep off the Nabesna Road in 1979 and 1981 up in the Boyden Hills (national preserve). She wrote in her email, “most hunting was much closer to home, as back then we didn’t have to travel as far. Sometimes out the kitchen door, but usually back in the hills a bit. Travel was tougher; usually one vehicle per family, and roads weren’t nearly as good.” She still owns her homestead in Tolsona, but it is no longer her primary permanent residence.

Public Hearing on the Resident Zone Request

A public hearing was held at the Tolsona Fire Hall on October 22, 2024. Thirteen members of the Tolsona community and five members of the park’s staff attended in person, and one former resident participated over the phone. Cultural anthropologists Barbara Cellarius and Amber Cohen facilitated the meeting. The hearing lasted around an hour. Park staff heard the following testimony in support of the resident zone request.

Tolsona Community Corporation President Jason Somerville said he moved to the Copper River Valley in 2019 and was issued a hunting permit for the park in 2020. He resided in Tazlina at the time. He also received a permit in 2021. He hunted for moose and sheep in the park.

James Miller stated that he and his wife have had a long family history of hunting in Wrangell-St. Elias National Park that goes back several generations. Miller and his wife live within the boundaries of the Glennallen Census Designated Place but identify themselves as residents of Tolsona. His wife’s grandfather had a trapping trail that went from Dry Creek to the base of Mount Sanford. They used that trail until motorized vehicles were not allowed in the 1980s. They hunted sheep and birds in the Nabesna area. He stated:

When that [Nabesna] Road opened up, that made it possible for Native people to use that road for bird hunting. They gathered every fall. That’s just the way it was. October month was their bird collecting. They hunted sheep—we still hunt sheep in them [Mentasta] Mountains just like her grandfather did when...that’s just the way it was.

He also mentioned bird hunting in Devil’s Mountain area. The Mentasta Mountains and Devil’s Mountain are both located in the national preserve.

Dennis Kananowicz moved to the Copper Valley in 2001 and lived in Tonsina for four years. He hunted in the national park during that time and after he moved to Tolsona in 2005. He picked berries in the park and bird hunted along the McCarthy Road. He said, “If I was granted access again, or the community was, you can bet your bottom dollar that I would be in the park doing more subsistence activities.”

Former resident Clare Jaeger said her community would go to the McCarthy area for bird hunting and for the fall moose hunt. She later provided the following written testimony, which focuses on the 1960s and 1970s:

It is very fair to say we hunted, fished, trapped, cut firewood, diamond willow, picked berries and greens across the Copper Basin. My immediate family did not have an airplane when I grew up. We drove a pickup truck or station wagon to the general location and walked from that point. The McCarthy Road and Nabesna Road offered deep access into exceptional hunting areas. It was my favorite experience to go on family dipnet trips annually to Chitina. In the 1960s and 1970s it was more typical for men and boys to go hunting, and I clearly recall my uncle, brother, husband and others going to McCarthy to hunt moose, sheep and birds in the fall and winter. My brother, Gene White, worked in the Wrangell Mountains as an assistant guide for Frank Pease using horses in the late 1970s. The Frank Pease hunting business and the camp were terminated, like evicted, by the NPS, and my brother moved to Anchorage to work as a mixer truck driver for Anchorage Sand and Gravel. He also hunted in the park for our family and was successful with moose. In the 1960s our annual cash income was typically less than four thousand dollars, and subsistence food was a necessity for survival.

Wrangell-St. Elias National Park Subsistence Resource Commission

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a nine-member advisory body that was created under the provisions of Section 808 of ANILCA to “devise and recommend to the Secretary and the Governor a program for subsistence hunting within the park.” ANILCA further describes an annual meeting process in which the SRC may recommend changes to the park’s subsistence program. Although 36 CFR 13.430 does not specifically identify a role for SRCs in resident zone community designation, eligibility is an aspect of subsistence hunting in the national park, and the SRC has made recommendations regarding previous requests to add communities to the park’s resident zone. Pursuant to ANILCA Section 808(b), “The Secretary shall promptly implement the program and recommendations submitted to him by each commission unless he finds in writing that such program or recommendations violates recognized principles of wildlife conservation, threatens the conservation of healthy populations of wildlife in the park or park monument, is contrary to the purposes for which the park or park monument is established, or would be detrimental to the satisfaction of subsistence needs of local residents.” The park must implement the recommendations of the SRC unless those recommendations fall under the specific circumstances outlined in Section 808(b). Therefore, the park relies heavily on the recommendations of the SRC regarding proposed changes to the resident zone.

The SRC will review this analysis and provide a recommendation to the superintendent on whether to add Tolsona to the resident zone during its February 2025 meeting.

Effects of the Request

If Tolsona qualifies for designation as a resident zone community, the National Park Service will initiate the regulatory process and complete the required compliance processes to recognize Tolsona as a resident zone community. Tolsona residents would become eligible to hunt, trap,

and fish in the Wrangell-St. Elias National Park under federal subsistence regulations for the species for which they have C&T use determinations, which currently includes black bear, caribou, and moose in various parts of Units 11 and 12 (See Table 1).

If Tolsona does not qualify as a resident zone community, residents with a long-term personal or family pattern of use could apply for and possibly be granted 13,440 permits along with individual C&Ts for species for which the community does not have C&T. Additionally, Tolsona residents will not lose any of their current subsistence eligibility if the community does not meet the criteria for inclusion in the resident zone. Tolsona residents will remain federally qualified subsistence users regardless of the outcome of this request. As such, Tolsona residents will remain eligible to harvest resources under federal subsistence regulations on all federal lands outside the national park for which they have C&T use determinations.

Whether Tolsona qualifies as a resident zone community or not, all Tolsona residents continue to be eligible to hunt, trap and fish in Wrangell-St. Elias National Preserve under federal subsistence regulations when they have federal C&T use determinations for the species and areas, and otherwise under State of Alaska regulations. The national park is also open to fishing under State of Alaska regulations. They would also remain eligible to engage in federal subsistence harvest opportunities in Unit 13, where they have C&T for all wildlife species for which a federal subsistence priority exists.

Summary

Subsistence is an important part of living in Tolsona. From harvest assessment data and information reported by residents themselves, Tolsona residents use wild resources such as moose and salmon to feed their families and to sustain their community. The question at the center of this analysis is whether subsistence uses by a significant concentration of Tolsona residents customarily and traditionally took place on lands within Wrangell-St. Elias National Park.

Although the NPS regulations adopted in 1981 did not define “customary and traditional,” the preamble to the final rule refers to the 1979 *U.S. Senate Committee Report* on ANILCA, which addresses C&T uses at length. The report emphasizes the intent that ANILCA is the “protection and continuation of the taking of fish, wildlife, and other renewable resources in the areas of, and by persons (both Native and non-Native) resident in, areas of Alaska in which such uses have played a long established and important role in the economy and culture of the community and in which such uses incorporate beliefs and customs which have been handed down by word of mouth or example from generation to generation” (p. 269).

Several concepts are apparent in this definition. One is the intent that ANILCA protect the *continued* taking and use of resources. Another is the focus on a long-established role—or a pattern of use—in sustaining subsistence economies and cultural practices in Alaskan communities. Another is the acknowledgement of the intergenerational nature of using plants and animals for subsistence.

Also contributing to the understanding of customary and traditional use are the eight factors developed by the State of Alaska and mentioned earlier in the analysis. These same eight factors were later adopted by the Federal Subsistence Management Program. They emphasize long-term, intergenerational uses of subsistence resources.

The term “significant concentrations” was developed after public comment on the proposed rule for NPS Alaska subsistence regulations in 1981. The language in the proposed rule was “preponderant concentrations.” After receiving public comments, the National Park Service changed to the current language, “significant concentrations,” to allow for an interpretation that could focus either on relative quantity, or the number of people in the community with a history of subsistence uses in the national park, or on quality, such as cultural vitality, community leadership, and influence, in which harvesting subsistence resources in the national park might play. According to 36 CFR 13.430(a)(2) and (c), all family members should be included in determining “significant concentrations,” and “family” is defined as “all persons living within a rural resident's household on a permanent basis.”

Information used in development of this analysis includes harvest surveys conducted by the ADF&G Division of Subsistence, interviews with Tolsona residents, testimony received at the public hearing, and federal subsistence permit data. To the greatest extent possible, this analysis is based on information regarding C&T uses of Wrangell-St. Elias National Park by people who live in the area that the Tolsona Community Corporation identifies as Tolsona, which includes people living near the Glenn Highway between Mile 159.8 and Mile 176.5, although the harvest surveys are generally conducted of geographic areas defined by the U.S. Census Bureau as Census Designated Places. NPS staff made a concerted effort to contact and interview any Tolsona residents with a history of subsistence uses in the national park.

Four people testified at the public hearing in October 2024 about subsistence uses within Wrangell-St. Elias National Park. NPS staff interviewed 12 current Tolsona residents; some of the people who were interviewed had also testified at the hearing. Between the public testimony and interviews, we heard from 13 people who currently live in the area defined by the community as Tolsona and whose households include a total of 19 people.

The current Tolsona residents who were not interviewed were generally recent arrivals without a history of harvesting resources in the national park. As noted in the report on the harvest survey for 2013, most members of Tolsona households surveyed during that year had moved into Tolsona during their lifetimes and mean length of residency was 23 years (Holen et al. 2015, p. 480). Park staff reached out to as many Tolsona residents as possible who reportedly had a long history of use in the national park, though, after over three contact attempts via phone and email, they were unable to contact two people whose names had been forwarded to them. One Tolsona resident contacted replied they did not have a history of hunting in the national park and so was not interviewed. Another resident contacted identified as a Mendeltna resident (and lived outside of the Tolsona Community Corporation boundaries for Tolsona). Consequently, that subsistence use was not considered in this analysis.

Table 6 summarizes the findings of this evaluation, which are also described below. Based on a census conducted by a member of the Tolsona Community Corporation in 2022, approximately 42 people live in the area Tolsona Community Corporation identifies as Tolsona. Based on the interviews conducted for this analysis and testimony at the public hearing, seven residents have a personal or family history of C&T subsistence uses in the national park that pre-dates the establishment of the park, however, for four of the residents, the majority of this use involved aircraft for access. One family, with three members in two households, has a pattern of use pre-dating the establishment of the park that did not involve aircraft access. Although they identify with Tolsona and live within the boundaries described by Tolsona Community Corporation, they currently reside in the Glennallen Census Designated Place and so are already eligible to engage in subsistence activities inside Wrangell-St. Elias National Park.

Six current Tolsona residents had a pattern of subsistence uses (i.e., at least 5 years of harvest activities) in the national park while living in a resident zone community before moving to Tolsona. The longest length of subsistence use in the national park was 14 years. Most of this use was opportunistic. Rather than repeated use of specific trapline cabins, fish camps, or hunting camps, or an intergenerational component to the use, the use was occasional and sporadic. As such, this use does not appear to meet the criteria of C&T use.

From the 2013 harvest assessment conducted by ADF&G Division of Subsistence, Tolsona residents undertook most of their subsistence activities in Unit 13. Though Tolsona residents are eligible to hunt in Wrangell-St. Elias National Preserve in Unit 11 under federal regulations, and thus can obtain a federal fall moose permit (FM1106), only a few residents have availed themselves of this opportunity. In interviews, some residents – including some who had previously lived in a resident zone community – explained that Unit 13 was closer to their homes and provided an easier access for hunting and other subsistence opportunities.

Table 6: Summary of Subsistence Uses of Wrangell-St. Elias National Park by Current Residents of Tolsona, Alaska.

Characteristic	Individuals	Households
Estimated population of Tolsona Census Designated Place (Glenn Highway Mile 166 to Mile 173) from 2020 U.S. Census	12	8
Estimated population of Tolsona community as defined by Tolsona Community Corporation (Glenn Highway Mile 159.8 to Mile 176.5) (2022)	42	37
Current Tolsona residents with a personal or family pattern of subsistence uses in the national park prior to 1980 with OR without the use of aircraft	7	3
Current Tolsona residents with a personal or family pattern of subsistence uses in the national park prior to establishment of the national park in 1980 without the use of aircraft	3	2*

Source: Census Designated Place population estimates from 2020 U.S. Census. Estimated population of Tolsona community as defined by Tolsona Community Corporation during a 2022

census provided by Tolsona Community Corporation president on January 24, 2025. Other information based on Wrangell-St. Elias National Park and Preserve contacts for this analysis. Consistent with the guidance in 36 CFR 13.430 (a)(2) and (c) regarding determining significant concentration, the resident numbers in this table include all people living on a permanent basis in the households of those who were interviewed or testified about their subsistence uses in the national park.

* Households are located in the Glennallen Census Designated Place, although they identify with Tolsona.

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