

Ch'u'itnu Historic District, Traditional Cultural Property  
Name of Property

Kenai Peninsula Borough, Alaska  
County and State

United States Department of the Interior  
National Park Service

## National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

### 1. Name of Property

Historic name: Ch'u'itnu Historic District, Traditional Cultural Property

Other names/site number: Ch'u'itnu, Chuitt River, Chuitna River

Name of related multiple property listing: N/A

*(Enter "N/A" if property is not part of a multiple property listing)*

### 2. Location

Street & number: NA

City or town: Tyonek State: AK County: Kenai Peninsula Borough

Not For Publication:  Vicinity:

### 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this \_\_\_ nomination \_\_\_ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property \_\_\_ meets \_\_\_ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

\_\_\_ national \_\_\_ statewide \_\_\_ local

Applicable National Register Criteria:

\_\_\_A \_\_\_B \_\_\_C \_\_\_D

<hr/>	
<b>Signature of certifying official/Title:</b>	<b>Date</b>
<hr/>	
<b>State or Federal agency/bureau or Tribal Government</b>	

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In my opinion, the property ___ meets ___ does not meet the National Register criteria.	
<hr/>	
<b>Signature of commenting official:</b>	<b>Date</b>
<hr/>	
<b>Title :</b>	<b>State or Federal agency/bureau or Tribal Government</b>

**4. National Park Service Certification**

I hereby certify that this property is:

- \_\_\_ entered in the National Register
- \_\_\_ determined eligible for the National Register
- \_\_\_ determined not eligible for the National Register
- \_\_\_ removed from the National Register
- \_\_\_ other (explain:) \_\_\_\_\_

\_\_\_\_\_  
Signature of the Keeper

\_\_\_\_\_  
Date of Action

**5. Classification**

**Ownership of Property**

*(Check as many boxes as apply.)*

- Private:  (Includes Native Corporation)
- Public – Local
- Public – State
- Public – Federal  (Includes Native allotments)
- Tribal

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**Category of Property**

*(Check only one box.)*

- Building(s)
- District  (Traditional Cultural Property)
- Site
- Structure
- Object

**Number of Resources within Property**

*(Do not include previously listed resources in the count)*

Contributing	Noncontributing ca. 104 (Note 2)	
_____	_____	buildings
<u>79 (Note 3)</u>	_____	sites
_____	<u>2 (Note 4)</u>	structures
_____	_____	objects
<u>79+</u>	<u>106</u>	Total

**Note 1:** While the Ch'u'itnu Historic District, Traditional Cultural Property contains a large but uncounted number of additional specific archaeological sites, as well as identifiable places of traditional cultural and spiritual practices (fish camps, hunting areas, etc.), defining its cultural and historical significance by a catalogue of discrete contributing and noncontributing properties is reductive. The District as a whole has historical and cultural significance for the Tubughna, or Tyonek Dena'ina. The entire District figures in their lifeways, subsistence, and identity as a people, and the whole District with its plants, animals, people, and cultural, spiritual, and subsistence practices is an integrated ecological-cultural system.

**Note 2:** The great bulk of the non-contributing properties are residential sites in the modern Native Village of Tyonek. Many include both single-family residences and small ancillary structures. The modern community center and school are also counted as buildings, as well as other buildings within the community.

**Note 3:** There are 79 identified archaeological sites, in addition to numerous locations of concentrated cultural activity involving fishing, hunting, plant gathering, and spiritual activities.

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There are an unknown number of archaeological sites and cultural use areas that require further identification as well.

**Note 4:** The North Foreland Dock and the airport are counted as non-contributing structures, while utility poles, pylons, and wires are not.

Number of contributing resources previously listed in the National Register N/A

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## 6. Function or Use

### Historic Functions

*(Enter categories from instructions.)*

Landscape - Natural Features (watershed, creeks, shoreline, forest)

Cultural Landscape (ethnographic)

Domestic - Village Sites

Domestic - Camps

Commerce/Trade (storage pits, cache)

Subsistence (multiple fishing sites, hunting, plant gathering)

Funerary - Graves/burials

Other (spiritual practice)

### Current Functions

*(Enter categories from instructions.)*

Landscape - Natural Features (watershed, creeks, shoreline, forest)

Cultural Landscape (ethnographic)

Domestic - Village Site

Domestic - Camps

Domestic - Single Dwellings

Commerce/Trade (storage pits, cache)

Commerce/Trade (department store, specialty store, warehouses, oil pumping facilities)

Social - Meeting Hall

Government - Offices

Education (school)

Subsistence (multiple fishing sites, hunting, plant gathering)

Graves/burials

Other (spiritual practice)

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## 7. Description

### Architectural Classification

*(Enter categories from instructions.)*

N/A

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**Materials:**

*(enter categories from instructions.)*

Principal exterior materials of the property: N/A

**Narrative Description**

*(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)*

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**Summary Paragraph**

The Ch'u'itnu Historic District, Traditional Cultural Property ("District") is a traditional cultural property, as defined in the National Park Service's National Register Bulletin 38. The District encompasses a profoundly significant ethnographic cultural landscape, as defined in the National Park Service's Preservation Brief 36. Ethnographic landscapes such as the Ch'u'itnu are often referred to informally as "traditional cultural landscapes" or "traditional landscapes."

The District includes the watershed<sup>1</sup> of the Ch'u'itnu (Chuitt or Chuitna River),<sup>2</sup> all or parts of several adjacent smaller drainages, and the shoreline of Cook Inlet for a distance of about nine miles to the southwest of the river's mouth. The District covers roughly 171 square miles of southcentral Alaska. It lies within the homeland and traditional hunting, fishing, and gathering territory of the Tubughna, or Tyonek Dena'ina, Athabascans.<sup>3</sup> The Ch'u'itnu is currently neither dammed nor obstructed for its entire length. The District includes part of the shoreline of Cook Inlet and the waters just offshore, as well as boreal forest, marshlands, and meadows in the river and creek valleys in the river's lowlands, and tundra in the river's uplands. The District also includes today's Native Village of Tyonek (*Qaggeyshlat*), which lies some 40 miles west of Anchorage, across Cook Inlet (*Tikahtnu*). Tyonek is the only Native village on the west side of Cook Inlet and home to about 180 year-round Dena'ina, residents. It is located within the Ch'u'itnu watershed, with ready access to its subsistence resources as well as the many small salmon spawning streams along Cook Inlet.

The cultural landscape of the District as described in this nomination is associated with, both from a historical and contemporary standpoint, the Native Village of Tyonek, a federally recognized Indian tribe. The Tubughna are heirs to the subsistence heritage of their ancestors, and they continue those subsistence practices to this day, incorporating the use of modern technology. Subsistence involves interaction with the natural environment and its wild, non-farmed, non-hatchery produced, and non-genetically modified species. Tubughna beliefs and

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<sup>1</sup> Throughout this document, "watershed" and "drainage" are used interchangeably.

<sup>2</sup> The *-nu* (or *-na*) suffix means "river of stream" in Dena'ina.

<sup>3</sup> The Tubughna are Dena'ina Athabascans from the area around the village of Tyonek. In Dena'ina, Tubughna means "People of the Beach." Dena'ina is part of the broader Athabascan ethnolinguistic group.

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practices with ancient roots continue today and form the cultural identity of the people of Tyonek. Accordingly, the District as a whole possesses integrity of location, design, setting, materials, workmanship, feeling, association, relationship to traditional cultural practices and beliefs, and condition.

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### **Narrative Description**

The Ch'u'itnu Historic District, Traditional Cultural Property is an important example of a traditional cultural property that encompasses a cohesive, traditional (*i.e.*, ethnographic) cultural landscape. (*see Map 1*) The District as a whole includes the Ch'u'itnu watershed, the adjacent drainages of Threemile (*Tuk'elehtnu*) and Indian (*Qaggeyshlat Betnu*) Creeks, and parts of the Tyonek (*Tank'itnu*) and Old Tyonek (Robert's) (*Ch'elehtnu*) Creek drainages, and extends west along the Cook Inlet coastline. (*see Map 1*) Like the Ch'u'itnu, these creeks flow directly into Cook Inlet. Every one of these waterways contributes significantly to the District as a key element in traditional and contemporary Tubughna culture. For a far more detailed description of the District, *see* Alan S. Boraas, Ronald T. Stanek, Douglas R. Reger & Thomas F. King, *The Ch'u'itnu Traditional Cultural Landscape: A District Eligible for the National Register of Historic Places* 29-41 (2015) (**Attachment 1**). Categories of land ownership in and around the District are shown in **Map 2**.

The District lies within the Cook Inlet-Susitna Lowland physiographic province, and has two distinct topographic elements. The lower part of the Ch'u'itnu flows through land that is nearly flat, with glacial lake geography dominating the landscape. The vegetation features extensive bogs and boreal forest whose major trees are spruce, birch, and alder. About five miles upriver from the Cook Inlet shoreline is the Beluga Plateau, a moderately rolling hummocky area of glacial moraine and glacial river deposits of gravel. The Beluga Plateau's vegetation is boreal spruce-birch-alder forest grading to brush tundra and ultimately alpine tundra at higher elevations in the foothills of the Tordrillo Mountains. Within the Beluga Plateau is Lone Ridge (*Dghelikda Nuten*), a distinctive visual feature. Lone Ridge is bounded on the east by a valley whose glacial melt water once flowed to the Ch'u'itnu, cutting a deep channel, but that now flows east to the coast through Threemile Creek. On the west of Lone Ridge is Lone Creek (*Tugh'i Betnu*), which also once drained melting Pleistocene glaciers, and still flows into the Ch'u'itnu.

**Traditional uses.** For at least a millennium, the Tubughna have carried out their economic, social, subsistence, cultural, and spiritual place-based practices throughout the District; practices that collectively define their salmon-based cultural identity, and that are still observed today. This concentration of activities within the District reflects not only its distinctive geological and ecological qualities and the resulting behavior of salmon and other culturally important animal species, but also the cultural and spiritual significance of these practices as an integral part of the District.

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**Salmon.** The gravel bed of the Ch'u'itnu, like other Alaskan rivers, provides optimal salmon spawning habitat. In particular, the hyporheic<sup>4</sup> habitat under and alongside the Ch'u'itnu, its tributaries, and adjacent streams is ideal for salmon egg incubation and fry survival. Spawning female salmon dig nests, called redds, as deep as 0.5 meters into the gravel river and stream beds. They lay thousands of eggs in the redds where males then inseminate them. The fertilized eggs grow to fry within the gravels, where they are both protected from predators and supplied with richly oxygenated water. Rivers like the Ch'u'itnu also have riparian habitats conducive to juvenile salmon survival. Root mats hang over the river and stream banks, providing salmon with shade and protection from predators.

Salmon, as an anadromous species, move to the ocean and grow to maturity in the nutrient rich upwelling waters of the northern Pacific Ocean. Those hatched in the Ch'u'itnu return there to continue the circle of life; laying and fertilizing eggs in the hyporheic habitats and, with their death, bringing nutrients from the sea that are critically important to terrestrial ecosystems.

The Ch'u'itnu is one of the major salmon-spawning rivers in Cook Inlet. It is the primary Chinook (king) salmon river on the west side of the Inlet. All five species of salmon—Chinook, Sockeye (red), Coho (silver), Pink (humpy), and Chum (dog)—spawn in the river system. The Tubughna harvest salmon as they swim up Cook Inlet to the river to spawn. Salmon have made it possible for the Tubughna to live year-round in and around the Ch'u'itnu watershed for more than a thousand years, and to develop a complex subsistence-based, place-linked identity and way of life. For extensive descriptive detail regarding the Ch'u'itnu watershed and its place in Tubughna identity and lifeways, *see Attachment 1*, at 34-112.

Today, the Tubughna continue to rely on salmon both for subsistence and as a key element in maintaining community and social connections. Salmon are harvested particularly during their spawning runs up Cook Inlet into the Ch'u'itnu; seasonal, temporary fish camps set up on the Cook Inlet shore are the sites of family and community gatherings where traditional interpersonal, intergenerational, and interfamilial ties are reinforced as salmon are harvested and prepared for storage. Although the traditional log shoreline weirs have been replaced by setnets extending out on posts from the beach, the essential practices of salmon subsistence with all its cultural associations continue to be central to Tubughna lifeways and identity.

Contemporary subsistence setnet fishing is governed by rules promulgated by the State of Alaska, specifying the geographic area that may be fished, the times when fishing may occur, the type of gear permissible, the allowable harvest quantities, and who may participate in the fishery. These rules are enforced in household permits issued annually. In addition to government regulations, a set of traditional rules based in Tubughna tradition and culture govern the fishery. These rules, or cultural postulates, govern the interaction between humans and nature and rest on the principle that nature, including salmon, is sensate and willful.

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<sup>4</sup> A hyporheic zone is a region of transition between streambeds (surface water) and groundwater. The upwelling of groundwater provides stream ecosystems with vital nutrients, while downwelling provides oxygen and organic material to underground ecosystems.

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Today, setnet subsistence salmon fishing is carried out in the saltwater intertidal area of the Cook Inlet shoreline, from a point one mile south of the Ch'u'itnu's mouth to near Granite Point (*Badi Dulyashit*). Closer to the mouth of the Ch'u'itnu, and along the river itself, fishing is restricted both by law and practice, to allow salmon to pass unhindered to their spawning sites.

Typically, each fishing household has a place along the beach where their family may have fished for generations, establishing a usufruct right to the location. If a household does not have a place, families may share a location with an established fishing household.

Salmon caught in setnets, as well as by modern methods such as rods and reels, are removed, handled, and processed according to a combination of long-standing Tubughna traditions and cultural practices. Today as in the past, subsistence fish, game, and plants are thought to offer themselves to humans for human use and are offended if they are not harvested. Christian Tubughna believe the salmon are "God-given." Before Christian missionization, the entity that was at the intersection of humans and nature was *Naq'eltani*—an omnipresent spirit. Wild fish, other animals, and plants are believed to be sensate and can withdraw their offer to be harvested, sometimes called "leaving the country," if they are treated badly, spoken of badly, or thought of badly.

Examples of bad behavior that are prohibited include admonitions to never step on or kick harvested fish lying on the shore or in the bottom of a boat. Tubughna never let caught fish get dirty and never waste fish or any other subsistence food. Salmon are never ridiculed or spoken of in a haughty or demeaning way. Tubughna do not think badly toward wild salmon or any wild animal, particularly those that are being hunted. There is a cultural prohibition against hook and release fishing because that is considered to be insulting toward God-given food.

Each spring a First Salmon Ceremony is performed wherever a family catches the first salmon, usually at their fish camp. The ritual is a world renewal ceremony marking the return of the subsistence cycle and the message of thanks for their return is said to be received by the salmon. An Orthodox Blessing of the Water has been practiced intermittently of late, since there is no resident priest in Tyonek, but has been practiced since the late 1800s. The ceremony cleanses the water for the return of the salmon and provides holy water said to have curative properties. When a priest is available the ceremony takes place at Tyonek Creek.

On the Ch'u'itnu, its tributaries and adjacent streams, and in lakes throughout the watershed, the Tubughna fish using rods and reels, the modern equivalents of the spears, weirs, and traps used in earlier times. People also fish in the many lakes found throughout the Ch'u'itnu watershed during the ice-free months and through the ice when the lakes freeze over.

**Other uses.** Salmon, though, is not the only cultural and subsistence resource within the District vital to the existence and identity of the Tubughna. Within the Ch'u'itnu watershed, other subsistence resource practices include mammal and bird hunting, trapping, and gathering of plant products, primarily berries, as well as wood harvesting for heating and building. With the exception of wood harvesting, each activity has a spiritual component, grounded in the



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understanding that plants and animal offer themselves to the hunter or gatherer. These traditional subsistence practices are utilized year-round, in predictable patterns.

From time immemorial through the present, a wide variety of natural resources were sought after, harvested, and used by the Tubughna. Dena'ina Athabascans are unique in that they are the only northern Athabascans adapted to both marine and terrestrial ecosystems.

For as long as they have occupied the Ch'u'itnu watershed, the Tubughna harvested caribou, black bear, ground squirrels, marmots, ptarmigan, tundra plants, and berries in the upland foothills of the watershed. As ecological changes occurred in the area, caribou habitat diminished and gave way to habitat more suitable for moose.

Traditionally, household heads held usufruct rights to areas of land primarily for trapping, but also hunting and other resource harvest activities. To a lesser degree today, these areas are recognized and respected among the Tubughna. Confounding usufruct right recognition in recent decades has been the application of American land ownership regimes. Additional overlapping mineral and development rights have further complicated access and wild resource use rights.

On three sides of the Native Village of Tyonek is an expansive area of rolling hills and riverine systems from coastal bluffs to alpine foothills, vegetated by a complex ecosystem of birch, spruce, and cottonwood forests. Scattered throughout this area are numerous lakes and freshwater wetlands. In this area the Tubughna hunt moose, black bear, wolves, spruce grouse, porcupine, and snowshoe hare; trap beaver, mink, land otter, weasel, marten, lynx, fox, and coyote; pick blueberries, cranberries, currants, mushrooms, vegetable greens, and medicinal plants; and cut wood for home heating, smoke houses, and steam baths.

The coastal and intertidal areas used by Tyonek residents make for the rich and varied array of wild resources on which the community relies. The Tubughna, as Dena'ina Athabascans, are unique in their adaptation to the use of a marine ecosystem and its resources. Most notable among these resources is the beluga whale, which inhabits the extent of Cook Inlet. The Tubughna traditionally hunted and harvested beluga along the shoreline and at river mouths from the Susitna River in the north to the McArthur River south of the Ch'u'itnu. In addition to beluga, the Tubughna also take harbor seals.

On the intertidal wetlands and nearshore areas that occur at river mouths near the village and in vast areas at the Susitna River flats and Trading Bay flats, Tyonek harvesters take a variety of waterfowl including: Canada, snow, and white-fronted geese; ducks including mallard, teal, widgeon, gadwall, golden-eye, and scoters; sandhill cranes; shorebirds; and marine bird eggs, including gull eggs. From these salt flats harvesters also take plants including beach lovage, marine plantain, Indian potato roots, sweetgale, grasses and sedges, willow, and alder.

**Archaeological Sites.** Surveys to date have identified 79 specific sites of archaeological interest within the District, 43 of which have been grouped into the Ch'u'itnu Archaeological District. See **Map 3**. The Keeper of the National Register of Historic Places determined the archeological

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district eligible for listing on the National Register of Historic Places (“NRHP”) in 2014, with a reminder that it appeared likely to be part of a larger NRHP-eligible ethnographic cultural landscape. Most of the sites identified were semi-permanent occupation sites, each containing one or more house pits and several cold storage pits. Some sites are known to contain human burials, and one of them, TYO-275, contains a Dena’ina cremation dating to between the late-19th and early-20th Centuries. *See Attachment 1*, at 96-105.

The great bulk of archaeological survey work done to date within the District’s boundaries has been concentrated within the Ch’u’itnu Archaeological District. Most other parts of the District as a whole have not yet been subjected to archaeological survey. It is certain that more extensive surveys would reveal more archaeological sites, widely distributed in at least the downstream areas of the Ch’u’itnu watershed. Archaeological sites are simply those places in the District where archaeologists can detect evidence of particular kinds of human activity, such as the construction and use of houses and cold storage pits and the interment of the dead. Upstream, more ephemeral sites would be expected because this portion of the District has been, and continues to be, the scene of intense and meaningful human activity, and is ascribed great cultural and spiritual importance by the Tubughna.

All the recorded residential sites originally contained traditional semi-subterranean houses, and two sites contained Euro-American buildings, the Smith Homestead and the Ladd Cannery complex. Above-ground evidence of Tubughna buildings has vanished with time, and both Euro-American building and structure complexes have been destroyed (the Smith Homestead, by fire, only in 2014). No buildings or structures remain that the Tubughna regard as contributing to the significance of the District, other than the temporary structures erected to support the harvest of salmon and related subsistence activities.

In 2013, a chert biface (a piece of hard, fine-grained silica-rich rock with two major surfaces, both reduced by the human removal of stone flakes) and a single chert flake were found in the right-of-way of a road planned as part of the defunct Chuitna Coal Project. The site of the discovery, near the proposed mine site, was given archaeological site number TYO-308. The artifacts appeared to be associated with a deposit of volcanic ash whose date is uncertain but that may reflect an eruption about 3,500 years ago. TYO-308 is counted as a contributing resource since it at least suggests that the watershed has been in use for well over a thousand years.

**Contributing and non-contributing elements.** The District is not easily broken up into contributing elements because the Tubughna have traditionally used the entire landscape for cultural, subsistence, spiritual, and related purposes, and think of it as an integrated whole, more than as an aggregate of specific places. Identifiable locations where concentrated, specific cultural activities take place, for example, particularly fruitful hunting areas, are kept confidential.

Most traditional uses have left no trace; but the places associated with such uses are nevertheless remembered. Young people may harvest their first moose, for example, almost anywhere in the watershed on lands used by their families. This is an important life event, and the location is

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remembered and honored in traditional ritual; but it is the act of one's first moose kill and its associated spiritual beliefs and practices that are important, and only incidentally the specific location in the District where particular moose have given their lives. Fish camps are more tightly located with reference to specific parts of the environment (the river, its tributaries, and the Cook Inlet shoreline), but they nevertheless are fungible; they move with the fish and with the changing practices of those fishing. Plant gathering places are of course constrained by geography, but change through time, particularly as changes in climate alter the distribution of plants. Places of individual spiritual practice are ubiquitous.

Non-contributing elements in the District include the houses and related structures, the school, tribal center, and other buildings comprising the contemporary Native Village of Tyonek and a small number of more widely scattered residences and related structures (*see Maps 4 & 5*), as well as roads, airstrips, power lines, oil storage and pumping facilities, and the North Foreland Dock. Individual homes in Tyonek are non-contributing properties in the sense that most of the harvesting and processing takes place at the place where salmon, *i.e.*, fish camp, or other subsistence foods are caught or shot and where the entrails can be properly disposed of for the sake of bear safety. Fish canning is usually done at the fish camp.

The St. Nicholas Orthodox Church is counted as a non-contributing building both because of its relatively recent date and because of its ownership by a religious organization. The church is considered to be a non-contributing property because, while it is central to spiritual beliefs that have to do with redemption and salvation, it does not directly inform cultural and spiritual practices related to subsistence activities and the Tubughna's use of the District. An exception is the Great Blessing of the Water that is conducted at a river, usually Tyonek Creek.

**Integrity of Location.** The Tubughna traditional cultural landscape consists of the Ch'u'itnu watershed and accompanying small creeks, including the river, its tributaries and the land. The integrity of the Ch'u'itnu watershed has not changed over time, and it continues to be a living cultural landscape. The river continues to flow, and the salmon continue to spawn and migrate within it as they have for centuries. Significant land features such as Lone Creek and Lone Ridge remain intact. Although Tyonek itself has moved, the significance of the District lies not in the location of the village, but in the historic and continuing use of the entire landscape for subsistence, and in the use of wild resources that depend on the Ch'u'itnu for life. The physical features of the District that make those uses possible and give the traditional landscape its significance are in the same location today that they were in pre-contact times, and therefore have integrity of location. *See Attachment 1*, at 119.

**Integrity of Design.** The relationship between Tubughna cultural features and the natural landscape that supports subsistence use constitutes the design of the property, and retains integrity. The Dena'ina use of the Ch'u'itnu watershed is organic in the sense that activities and sites are determined by, not forced on, features of the ecological landscape. Pre-contact sites are located near anadromous streams, as are historic and contemporary settlements, fish camps, and hunting locations. Dena'ina spirituality is also rooted in the ecological landscape: rituals such as

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the First Salmon Ceremony and a young hunter's first moose kill occur on the spot of the catch or kill, and traditional Dena'ina today associate particular spots with spirit forces, just as their ancestors did. Although some practices and beliefs of the Tubughna have changed over time, their fundamentals have not, and the ongoing subsistence-based land use patterns, as well as the land that supplies those resources, therefore exhibit integrity of design. *See Attachment 1*, at 120.

**Integrity of Setting.** The most obvious large-scale element of the District is the Ch'u'itnu itself. As discussed above, the Ch'u'itnu and its watershed retains integrity of location; it also retains its significance to the people of Tyonek, and most importantly, it retains its character as a salmon river. The river and its tributaries comprise the ecological basis for salmon to thrive. Eggs are deposited in the hyporheic gravels, uniquely structured by repeated Pleistocene glaciations to form a perfect habitat for the salmon fry. The fry hatch, grow, become smolt, and swim to sea, finally returning to their natal stream, where some are intercepted by Dena'ina fishermen for subsistence. The streams of southcentral Alaska are unequalled as habitat for salmon, due in particular to their hyporheic and riparian zones. Without the river and its intricate habitat, there would be no salmon and no salmon subsistence. The river also supports other species important for Tubughna subsistence, including other fish, water-based furbearers such as beaver, and terrestrial animals.

The District as a whole remains largely undeveloped, as does the surrounding region. Although some development has occurred, most notably the Beluga Gas Fields and a small gravel road system, most of the Ch'u'itnu watershed as well as the surrounding land retains its wild character. It continues to be home to subsistence resources, as well as to spirit forces, both of which give the District much the same character for contemporary Tubughna as it did for their ancestors. As a whole, the Ch'u'itnu and its tributaries, the land they drain, and the surrounding areas exhibit clear integrity of setting. *See Attachment 1*, at 120-21.

**Integrity of Materials.** The significance of the District lies in its uninterrupted subsistence use by the Tubughna for the last one thousand years. The materials that relate to its significance are therefore the materials from which subsistence tools such as fish snares and weirs were made, as well as materials from which distinctive cultural features such as underground cold storage pits (*elnen tu'h*) and traditional log houses (*nichil*) were made. Materials used in rituals are also significant. These traditional materials are all derived from the vegetation or animal resources of the area, and all are still present today throughout most of the District.

Alexan (1965), Osgood (1976), and Kalifornsky (1991) all describe traditional fishing methods using spruce root or sinew lines. Wood was used to build weirs and fishing platforms, and to make fishing spears. Wood logs were also used to build log houses, and birch or spruce bark covered by sod formed their roofs (Osgood 1976:55-62). Birch bark was also essential for the waterproofing properties of the cold storage pits. Salmon eggs used as glue and moss used as insulation also made the cold storage pits possible. Salmon frozen in the cold storage pits made Dena'ina sedentism possible. All of these materials—spruce, birch, animal sinew, salmon, moss—are present in the Ch'u'itnu watershed today. More generally, the vegetation and animal

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resources of the Ch'u'itnu watershed are “similar to historic species in scale, type, and visual effect” (McClelland et al. 1999:23), and are significant because they are what made centuries of continued subsistence use possible. *See Attachment 1*, at 121.

**Integrity of Workmanship.** Underground cold storage pits made sustainable salmon subsistence possible in Cook Inlet and “reveal individual, local [and] regional . . . applications of . . . technological practices” (Andrus and Shrimpton 2002). These pits effectively created an insulated, waterproof laminate around dried salmon and solved the problem of preserving salmon caught in the summer and fall for consumption in winter and spring. They are unique to the Dena'ina and Ahtna and contributed to cultural complexity among Denè Athabascans. The log houses also demonstrate Dena'ina workmanship. Like the cold storage pits, these grass-shingled log houses of prehistory have melded with the landscape, but have left buried expressions that are examples of the workmanship of their builders.

Subsistence practices themselves demonstrate considerable workmanship. Although nets are now made of nylon rather than sinew, modern intertidal fishing techniques still resemble those used by pre-contact Dena'ina. The importance of sharing salmon and other wild resources with family and other community members traces back to the *qeshqa*-led (chief) redistribution systems. Spiritual elements associated with subsistence also demonstrate integrity of workmanship. Much like traditional farming techniques might prepare the land for planting, the First Salmon Ceremony, the Great Blessing of the Water, and the general practice of respect for all living things are used to ensure a successful subsistence harvest. *See Attachment 1*, at 122.

**Integrity of Feeling.** In this case, the historic scene comprises the natural environment and traditional Tubughna interactions with it. To walk the Ch'u'itnu watershed is to walk a landscape that has changed little since Dena'ina first settled there. The resident or knowledgeable visitor has a sense of being in a cultural landscape that has been and remains sustainable because of food sovereignty based on salmon and other wild resources, and because of social and spiritual dimensions that incorporate ecological concepts into social and spiritual practice. For Tyonek residents, the Ch'u'itnu watershed evokes a profound feeling of belonging and continuity; as Al Goozmer, former President of the Native Village of Tyonek, said, “That Chuitt River is ours. It's always been ours.” *See Attachment 1*, at 122-23.

**Integrity of Association.** The Tubughna have used the Ch'u'itnu watershed for at least one thousand years. The Ch'u'itnu is one of the few places in the United States where an indigenous people has been able to make the transition from pre-contact times to the present based on the same keystone species as their ancestors, wild salmon. The Tubughna are the direct descendants of the people who began intensive salmon fishing and fish preservation using underground cold storage pits and who lived in log houses. They continue to harvest and process wild salmon and other wild food resources according to the same seasonal cycle as their ancestors, and they do so using traditional practices such as fish camps, the First Salmon Ceremony and sharing subsistence resources. The association between the Ch'u'itnu watershed and its historic significance—a millennium of Tubughna subsistence based on the salmon of the Ch'u'itnu, and the related social and spiritual practices—is clearly reflected in present-day land use patterns, as

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well as by the annual return of salmon, the enduring seasonal subsistence harvest cycle, and the Tubughna society built upon salmon and subsistence. *See Attachment 1*, at 123.

**Integrity of Relationship to Traditional Cultural Practices or Beliefs.** Tubughna know that the Ch'u'itnu watershed provides the ecological basis for salmon and other wild food resources. It is also the landscape on which cultural practices play out and have played out since the advent of sedentary fishing at least one thousand years ago. A number of cultural practices and beliefs are central to traditional cultural life on this landscape. Most fundamentally these involve sharing, which literally defines community. More specific institutions include the First Salmon Ceremony, the Great Blessing of the Water, the concept of interaction with the land and its spirits, the concept of proper interaction with sensate, willful animals, and the identification and protection of grave and cremation locations which are understood to house ancestor spirits. These are all parts of the culture of sustainable subsistence, and structure the traditional relationship between Tubughna society and the Ch'u'itnu watershed. The beliefs and practices of the Tubughna relate to and depend on the wild resources of the river and its watershed, and on their own uninterrupted relationship with the District. The Ch'u'itnu watershed therefore has integrity of relationship with Tubughna beliefs and practices. *See Attachment 1*, at 124.

**Integrity of Condition.** The Ch'u'itnu watershed has integrity of location, design, setting, and materials, and therefore has integrity of condition. Most importantly, the people of Tyonek view it as having that integrity. Interviews with Tyonek residents reveal an intimate knowledge of, and strong connection to, the Ch'u'itnu watershed. Tyonek residents describe the significance of the river itself, its salmon runs, their family's traditional territories, and their sharing traditions, all with reference to the long history of subsistence traditions that those places and practices represent. Because the physical features of the District, including its location, design, setting, and materials, are intact, and because the Tubughna view them as having cultural and historic significance, the Ch'u'itnu watershed has integrity of condition. *See Attachment 1*, at 124-25.

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## 8. Statement of Significance

### Applicable National Register Criteria

*(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)*

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

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- D. Property has yielded, or is likely to yield, information important in prehistory or history.

**Criteria Considerations**

*(Mark "x" in all the boxes that apply.)*

- A. Owned by a religious institution or used for religious purposes
- B. Removed from its original location
- C. A birthplace or grave (in that people have been born and buried there)
- D. A cemetery (in that the landscape contains graves)
- E. A reconstructed building, object, or structure
- F. A commemorative property
- G. Less than 50 years old or achieving significance within the past 50 years

**Note 5:** The above considerations are incidental to the character and significance of the District. The St. Nicholas Orthodox Church exhibits Criteria Consideration A, but is identified as non-contributing to the District as a traditional cultural property. This does not mean that the church may not be eligible for NRHP listing for other reasons.

**Areas of Significance**

*(Enter categories from instructions.)*

Ethnic Heritage (Native American)

Other (Traditional cultural significance)

**Period of Significance**

c. 1,000 ACE (or earlier)-present

**Significant Dates**

N/A

**Significant Person**

*(Complete only if Criterion B is marked above.)*

N/A

**Cultural Affiliation**

Tubughna (Tyonek Dena'ina) Athabascan (Alaska Native/Indigenous)

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**Architect/Builder**

N/A

**Statement of Significance Summary Paragraph**

*(Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)*

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**Summary Paragraph**

The Ch'u'itnu Historic District, Traditional Cultural Property is a traditional cultural property associated with the Tubughna people. The District encompasses an important ethnographic cultural landscape with historic and ongoing significance at the Tribal, State, and Local levels under National Register Criteria A, C, and D. The culturally and historically significant events that have taken place and continue to take place in the Ch'u'itnu watershed comprise complex patterns of human activity and belief, all organized around and fundamentally influenced by salmon subsistence. The Tubughna relationship with salmon has defined the culture's use of the land and its plants and animals; it has defined Tubughna social organization and settlement patterns; and it has greatly influenced the people's spiritual beliefs and practices. The relationship between the people, the land, and the salmon has been imprinted on the District through centuries of subsistence use, and is fundamental to the people's sense of freedom, identity, and self-worth. This relationship has existed in Tubughna tradition since time immemorial, and the archeological record shows at least one thousand years of continued occupation. The District is also distinguishable because it constitutes a clearly defined set of landforms: the Ch'u'itnu watershed and its culturally significant immediate surroundings. The District is a culturally and historically significant entity even if individual components within it, such as an individual residence, a cold storage pit, or a fishing site, are regarded as lacking distinction. The District further has the potential to yield further important information related to our understanding of human history and prehistory. Therefore, the District is eligible under Criteria A, C, and D.

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**Narrative Statement of Significance**

*(Provide at least one paragraph for each area of significance.)*

Since time immemorial, the Tubughna have used and occupied the Ch'u'itnu watershed and many small drainages that flow into Cook Inlet; it has always been an essential part of their traditional territory. They are archaeologically documented to have done so for at least the last one thousand years. The District along the river, including the river mouth and along the coastline, has been, and continues to be, a place where the Tubughna carry out subsistence resource harvests, settlement, celebrations of life, and travel to accomplish these purposes. Archaeological evidence of this sustained relationship between the Tubughna and the Ch'u'itnu watershed includes house structures, associated storage pits, and cremation and burial sites. These provide a glimpse into Dena'ina and Tubughna life before contact and during their initial transitions after contact with Russian traders. The Tubughna continued to use traditional salmon fishing localities during the Russian occupation of their territory. Only a handful of Russians



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were stationed at the Tyonek trading post during the Russian American period after the killing of 20 Russians by Dena'ina at the Tyonek post, circa 1795. Historic documents, photographs, ethnographies, and contemporary scientific research demonstrate a continuity of occupation and subsistence use of the area to the present day. Today, the Tubughna continue to use the District much as their ancestors did; it is essential to their physical survival and central to their cultural traditions.

**Ethnic Heritage.** The Ch'u'itnu watershed is of central significance in the ethnic heritage of the Tubughna, or Tyonek Dena'ina, Athabascans. The Tubughna are Dena'ina Athabascans from the area around the village of Tyonek. In Dena'ina, Tubughna means "People of the Beach." Dena'ina is part of the broader Athabaskan ethnolinguistic group. The Dena'ina, or Tanaina, traditionally occupied some 41,000 square miles of southcentral Alaska.

In the District, the events that have made significant contributions to the broad patterns of Tubughna, and our own, history (Criterion A) include the sustained subsistence and related indigenous social and spiritual place-based practices that have operated without interruption from pre-contact times to the present. The key components to this District are the Ch'u'itnu and adjacent creeks, including the entire watershed where salmon spawn, and the entire surrounding landscape, where the traditional and cultural practices of the Tubughna associated with the river, creeks, salmon, and wildlife have been shaped by the last millennium of continued subsistence practice. The Ch'u'itnu is a living, traditional cultural landscape that is a testimony to the Tubughna's ability to maintain their identity in the modern world, while preserving and continuing the heritage of their ancestors. The District's preservation as a natural, working ecosystem is essential to the continuation of Tubughna traditional culture.

As a functioning ecological-cultural system integrating the Cook Inlet beach, the Ch'u'itnu and its tributaries, its aquatic life, its terrestrial plants and animals, and its people and their cultural practices, comprises a distinctive entity (Criterion C). The District contains a substantial concentration of sites containing data reflecting the history and lifeways of the Tubughna. Their historic and ongoing use of the watershed, creeks, landscape, and shoreline is also rich in archeological and anthropological data potential (Criterion D).

**Traditional Cultural Significance.** National Register Bulletin 38 specifies that a place may be eligible for the NRHP "because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." The District is integrally associated with the millennia-old cultural practices and beliefs of the Tubughna. It is regarded by the people residing in and around the Native Village of Tyonek as essential in maintaining their community's cultural identity. As such, the District is eligible for listing in the NRHP under Criterion A as a traditional cultural property. The District's landscape as traditionally defined and valued by the Tubughna contributes to its eligibility under Criterion C; it is a distinctive entity—the physical center of Tubughna traditional subsistence culture and spiritual practice.

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The ongoing cultural significance of the District is illustrated by the vigorous efforts undertaken in recent years by the Native Village of Tyonek to guarantee its preservation. For example, in 2015 the Native Village of Tyonek negotiated the return of 160 acres of land called *Eten Bunkda* (Mother of the Earth) in the Ch'u'itnu watershed from The Nature Conservancy, and will manage it under a conservation easement held by Great Land Trust to protect its natural and cultural values. As Al Goozmer said, regaining control of the land was like “a family member has come home.” <http://greatlandtrust.org/like-a-family-member-has-come-home-salmon-land-partnerships-in-tyonek-alaska/>.

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## 9. Major Bibliographical References

### Bibliography

(Cite the books, articles, and other sources used in preparing this form.)

Alan S. Boraas, & Douglas Reger, *Archaeological Investigations: Ch'u'itnu Area; Cook Inlet, Alaska. Report on Cultural Resources of Nature Conservancy Property* (2013) (report on file with the Native American Rights Fund, Anchorage; submitted to the United States Army Corps of Engineers, Alaska State Historic Preservation Officer, Advisory Council on Historic Preservation).

Alan Boraas, Douglas Reger, Ronald T. Stanek, Al Goozmer, Chad Chickalusion, Chris King, Stan Bismark, Roland Standifer & Rob Rosenfeld, *Ch'u'itnu Area Archaeological Investigations, Cook Inlet, Alaska: Report on Cultural Resources of Nature Conservancy, Alaska Property* (2013) (prepared for Native American Rights Fund and Native Village of Tyonek).

Alan S. Boraas, Ronald T. Stanek, and Douglas R. Reger, *The Case for Criterion A and an Expanded Ch'u'itnu Archaeological District, Cook Inlet Alaska* (2013) (prepared for Native American Rights Fund and the Native Village of Tyonek).

Alan S. Boraas, Ronald T. Stanek, Douglas R. Reger & Thomas F. King, *The Ch'u'itnu Traditional Cultural Landscape: A District Eligible for the National Register of Historic Places, National Register of Historic Places* (April 3, 2015) (report submitted to the U.S. Army Corps of Engineers, Alaska State Historic Preservation Officer, Advisory Council on Historic Preservation by the Native American Rights Fund on behalf of the Native Village of Tyonek) (**Attachment 1**).

Charles Birnbaum, *Preservation Brief 36—Protecting Cultural Landscapes: Planning, Treatment, and Management of Historic Landscapes*, National Park Service (1994)

Stephan R. Braund, Huntington Consulting, *Relationship Between the Native Village of Tyonek, Alaska and Beluga Whales in Cook Inlet, Alaska* (2011).

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Stephen R. Braund & Associates, *PacRim Coal Chuitna Coal Project: Section 106 Report: Determination of Eligibility for the National Register of Historic Places, Literature Review, Field Survey and Recommendations 2006 Field Season* (2006) (prepared for DRven Corporation).

*Cultural Resources Survey Report, 2013 Field Season* (May 16, 2014) (report to PacRim Coal, Chuitna Coal Project).

James A. Fall, Dan J. Foster & Ronald T. Stanek, *The Use of Fish and Wildlife Resources in Tyonek, Alaska: Tubughna Ch'aadach' Elnen Ghuhdilt'a*, Technical Paper No. 105 (1984).

David Holen & James M. Fall, Division of Subsistence, Alaska Department of Fish and Game, *Overview of Subsistence Salmon Fisheries in the Tyonek Subdistrict and Yentna River, Cook Inlet, Alaska*, Special Publication # BOF-2011-01 (2011).

James Kari & James A. Fall, *Shem Pete's Alaska: The Territory of the Upper Cook Inlet Dena'ina* (2nd ed., 2003).

James Kari & James A. Fall, *Shem Pete's Alaska: The Territory of the Upper Cook Inlet Dena'ina* (Revised 2nd ed., 2016)

Patricia L. Parker and Thomas F. King, *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties*, National Park Service (1998)

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**Previous documentation on file (NPS):**

- preliminary determination of individual listing (36 CFR 67) has been requested
- previously listed in the National Register
- previously determined eligible by the National Register (in part, as the Ch'u'itnu Archaeological District)
- designated a National Historic Landmark
- recorded by Historic American Buildings Survey # \_\_\_\_\_
- recorded by Historic American Engineering Record # \_\_\_\_\_
- recorded by Historic American Landscape Survey # \_\_\_\_\_

**Primary location of additional data:**

- State Historic Preservation Office
- Other State agency
- Federal agency (United States Army Corps of Engineers)
- Local government
- University
- Other

Name of repository: Native American Rights Fund, Anchorage Office, on behalf of the Native Village of Tyonek

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**Historic Resources Survey Number (if assigned):** TYO-00364

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## 10. Geographical Data

**Acreeage of Property:** 109,282.68 acres (170.75 miles<sup>2</sup>)  
(Use either the UTM system or latitude/longitude coordinates)

### UTM References

Datum

(indicated on USGS map):

NAD 1927 or  NAD 1983

1.	Zone:	5N	Easting:	564382.9930	Northing:	6793452.0507
2.	Zone:	5N	Easting:	567512.9487	Northing:	6794535.7726
3.	Zone:	5N	Easting:	571218.4024	Northing:	6795057.9667
4.	Zone:	5N	Easting:	580821.5170	Northing:	6791506.2874
5.	Zone:	5N	Easting:	584348.3325	Northing:	6791275.1230
6.	Zone:	5N	Easting:	592886.5411	Northing:	6790540.5563
7.	Zone:	5N	Easting:	595135.5040	Northing:	6789693.8879
8.	Zone:	5N	Easting:	596723.0071	Northing:	6782708.8739
9.	Zone:	5N	Easting:	603932.9174	Northing:	6779163.4502
10.	Zone:	5N	Easting:	601141.5576	Northing:	6772363.6449
11.	Zone:	5N	Easting:	599249.7830	Northing:	6769148.9510
12.	Zone:	5N	Easting:	589380.8049	Northing:	6764783.3172
13.	Zone:	5N	Easting:	582633.9165	Northing:	6764479.0458
14.	Zone:	5N	Easting:	592741.0200	Northing:	6768487.4913
15.	Zone:	5N	Easting:	598416.3438	Northing:	6769664.8895

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16.	Zone:	5N	Easting: 590121.6398	Northing: 6774586.1493
17.	Zone:	5N	Easting: 582356.1034	Northing: 6778409.3862
18.	Zone:	5N	Easting: 579181.0970	Northing: 6777205.5296
19.	Zone:	5N	Easting: 573055.9806	Northing: 6779520.6384
20.	Zone:	5N	Easting: 570277.8501	Northing: 6783171.8957
21.	Zone:	5N	Easting: 567975.9705	Northing: 6784283.1479
22.	Zone:	5N	Easting: 563502.0558	Northing: 6791810.5367

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**Verbal Boundary Description**

*(Describe the boundaries of the property.)*

For the most part, the District boundary follows the physiographic borders of the Ch'u'itnu watershed. *See Map 1.* The boundary also extends along the northwestern shoreline of Cook Inlet to include the shoreline and near offshore areas where the Tubughna harvest salmon during their spawning runs into the Ch'u'itnu, and where they carry out related traditional cultural and subsistence activities. The boundaries also include all or parts of adjacent creeks that the Tubughna treat as parts of the culturally valued landscape. The boundaries defined here differ somewhat from those displayed in **Attachment 1**, Figure 10, at 40. These differences largely reflect a refinement of the boundary and responses to the July 15, 2016, letter by the Corps proposing its own NRHP-eligible traditional cultural landscape. *See Attachment 2.*

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**Boundary Justification**

*(Explain why the boundaries were selected.)*

The Ch'u'itnu watershed as a whole (including its adjacent creeks and tributaries), from its headwaters to its confluence with Cook Inlet, is central to the identity of the Tubughna. It is necessary to include the watershed in its entirety as salmon spawning habitat, without which function it would not be the cultural resource that it is to the Tubughna. Rain and snow falling in the upper reaches of the watershed charge the tributaries that feed the main stem of the Ch'u'itnu, and create the habitats relied upon by salmon, other fish, moose, and other culturally significant plants and animals. The subsistence and cultural practices that embody the significance the Ch'u'itnu watershed plays in Tubughna identity occur throughout the terrestrial and aquatic habitats encompassed in the boundaries of the District. The entire watershed is an integrated ecological-cultural system. Without the fully functioning ecological-cultural system of the Ch'u'itnu watershed represented by the entire District, the traditional cultural and subsistence life of the Tubughna would be impossible.

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The entire watershed functions as an integrated ecological-cultural system, sustaining the salmon and other subsistence resources upon which Tubughna traditional culture and physical survival relies; the integrity of the upper reaches of the watershed is vital to the cultural integrity of the entire District. The entire watershed is used by Tubughna hunters, fishers, and gatherers, and is regarded by them as a whole, undivided landscape of profound significance. National Register Bulletin 38 states that “[i]t is vital to evaluate properties thought to have traditional cultural significance from the standpoint of those who may ascribe such significance to them.” The entire District represents an integrated ecological-cultural system. It is to the whole Ch'u'itnu watershed, as well as to its component streams, bogs, forests, tundra, shore, plants, wildlife, and fish that the Tubughna ascribe significance.

The boundary extends beyond the geographical scope of the Ch'u'itnu watershed and its adjacent creeks, however, and runs down the shore of Cook Inlet to Granite Point. Much of the significance of the Ch'u'itnu involves salmon—their spawning runs into the river, their spawning in the river and its tributary headwaters, and their capture by Tubughna fishers along the Cook Inlet shoreline. Accordingly, it is necessary to extend the District boundaries down the Cook Inlet shoreline southwest of the mouth of the Ch'u'itnu, where the Tubughna catch, trap, and process fish, and carry out a range of related cultural and subsistence related activities. The Tubughna harvest migrating salmon along the shore as far southeast as Granite Point as parts of the cultural subsistence system described herein, and in more detail in **Attachment 1**. While recognizing that where to “draw the line” along the Cook Inlet shoreline is relatively arbitrary and antithetical to Tubughna culture and subsistence practices, the proposed boundary incorporates most of the Tubughna’s traditional setnet locations.

The District also sets the inshore boundary of this “extension” down Cook Inlet at a line 100 yards inland from the mean lower low water line (“MLLWL”). Although this boundary is also arbitrary, it is within this 100-yard strip that most shoreline salmon harvesting and related activities take place. The offshore boundary of the District includes areas in which substantial salmon harvesting takes place. To establish this boundary for the purposes of this nomination, the personal experience of Tyonek fishermen, plus ethnographic observations on Tubughna fishing practices discussed in **Attachment 1**, at 52-55, 75-77, 87-88, 106-08, together with a recent report prepared by the Alaska Department of Fish and Game (Holen & Fall 2011) were considered. The Tubughna fish along the Cook Inlet shoreline and typically use setnets extending out perpendicular to the shore, much as their ancestors did with fish weirs. *See Narrative Description, supra* Section 7; **Attachment 1**, at 52-3. These nets typically extend out to approximately the lowest of low tide marks, so the offshore boundary has been drawn at the MLLWL.

Accordingly, it is necessary to draw a boundary encompassing the watershed in its entirety, and along the Cook Inlet shoreline. The adjacent small creeks, such as Indian Creek and the south branch of Threemile Creek, flowing into Cook Inlet southwest and northeast of the Ch'u'itnu’s mouth, are also included, as they are treated by the Tubughna as parts of the same system. The modern village of Tyonek is located between the Ch'u'itnu and Tyonek Creek. Before modern wells, Tyonek Creek afforded easier access to fresh water for the village than did the Ch'u'itnu,

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particularly during spring breakup. As it is, the end of the runway is within a hundred yards of the Ch'u'itnu floodplain. The boundary defined here is mostly the same as that displayed in **Attachment 1**, Figure 10 at 40, but has been slightly modified and refined.

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## 11. Form Prepared By

name/title: Heather Kendall-Miller, Wesley James Furlong, Thomas F. King, Alan Boraas, Douglas Reger, Ronald Stanek, Douglas Tosa, & Donovan Bailey, with Jill Rush & Robert Rosenfeld

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e-mail: kendall@narf.org, wfurlong@narf.org

telephone: (907) 276-0680

date: 09/27/2017

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## Additional Documentation

*Submit the following items with the completed form:*

- **Maps:** A USGS map or equivalent (7.5 or 15 minute series) indicating the property's location.
  - **Map 1** shows the District's location and boundary.

**Note 6:** Standard 7.5' and 15' U.S. Geological Survey (USGS) quadrangles are not available for the vicinity of the Ch'u'itnu Historic District, Traditional Cultural Property. The attached topographic map (**Map 1**) was stitched together from USGS 1:63,360 topographic series maps (TYONEK B-5, TYONEK B-4, TYONEK A-5, TYONEK A-4, and TYONEK A-3) by Douglas Tosa, Marine Survey Technician at Seaworks Group, and Donovan Bailey, SLR Consulting. Note that UTM coordinates are given for the twenty-two vertices of a polygon encompassing the whole District.

- **Map 2** shows land ownership within and adjacent to the District.
  - **Map 3** shows archaeological sites and site-clusters documented to date within the District.
  - **Map 4** shows modern features within the District.
  - **Map 5** shows inset detail of non-contributing buildings/structures in Tyonek residential area.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

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- **Map 6** keys all attached photographs to their location.
- **Additional items:** *(Check with the SHPO, TPO, or FPO for any additional items.)*

### **Photographs**

*Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.*

### **Photograph Log**

**Note 7:** Provided as a table

***Paperwork Reduction Act Statement:** This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).*

***Estimated Burden Statement:** Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.*



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# Maps

- **Map 1:** **Ch'u'itnu Historic District, Traditional Cultural Property** on topographic map compiled from USGS 1:63,360 topographic series maps (TYONEK B-5, TYONEK B-4, TYONEK A-5, TYONEK A-4, and TYONEK A-3) by Douglas Tosa, Marine Survey Technician at Seaworks Group, and Donovan Bailey, SLR Consulting. Note that UTM coordinates are given for the twenty-two vertices of a polygon encompassing the whole District.
- **Map 2:** Categories of land ownership within and adjacent to the District.
- **Map 3:** Archaeological sites and site-clusters documented to date within the District.
- **Map 4:** Modern features within the District.
- **Map 5:** Inset Detail: Non-contributing buildings/structures in Tyonek residential area; land ownership coded as in Map 4.
- **Map 6:** Keys all attached photographs to their location.