

NDP25-01 Executive Summary

General Description	Proposal NDP25-01 requests to change the designation of the Ketchikan Area to rural, or to alternatively designate the federally recognized Ketchikan Indian Community Service Area as rural. <i>Submitted by the Ketchikan Indian Community (KIC).</i>
Proposed Regulation	The Ketchikan Area is considered rural, or the federally recognized Ketchikan Indian Community Service Area is considered rural.
OSM Conclusion	Neutral
Southeast Alaska Subsistence Regional Advisory Council Recommendation	Oppose
Interagency Staff Committee Comments	<p>The Ketchikan Indian Community (KIC) has a well-documented interest in the non-rural status of their tribal homelands. The Interagency Staff Committee acknowledges the extensive efforts made by the KIC to provide substantive and relevant information to the Federal Subsistence Board (Board) for consideration.</p> <p>As with previous non-rural determinations made by the Board, consideration of a community’s unique characteristics has been the main focus and provides the primary basis for their decisions. Potential impacts on subsistence resources and/or effects to other federally-qualified subsistence users that could result from revisions are outside the established procedures used by the Board, and are addressed through separate regulatory processes that are already in place (e.g. Section 804 prioritizations).</p> <p>The Southeast Alaska Subsistence Regional Advisory Council (Council) discussed at length what the definition of ‘rural’ should be when describing whether or not a community such as Ketchikan should be considered rural because it exhibits both rural and non-rural characteristics. In addition, the Council expressed their concerns regarding the addition of Ketchikan residents to the pool of federally qualified subsistence users and the possible effects on subsistence resources. The Council’s action was not based just on the consideration of Ketchikan’s rural characteristics, which represents a significant departure from the approach the Board has used for prior determinations. A majority of the Council also indicated a desire to revise eligibility for the Federal subsistence priority so that Tribal affiliations could be considered, in addition to or in lieu of the geographically-based determinations currently used by the Federal Subsistence Management Program. Such a change would require a revision to ANILCA Title VIII through Congressional action, versus rule-making by the Secretaries, as suggested by some of the Council members.</p>

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ADF&G Comments	Neutral
Written Public Comments	None

STAFF ANALYSIS NDP25-01

ISSUE

Nonrural Determination Proposal NDP25-01 was submitted by the Ketchikan Indian Community (KIC). It requests that the Federal Subsistence Board (Board) change the Ketchikan Area to a rural status area. The Ketchikan Area currently includes the City of Ketchikan, Revillagigedo Island, Pennock Island, parts of Gravina Island, the southern portion of Cleveland Peninsula, and the surrounding waters (see **Figure 2**). It does not include Saxman, which is considered rural by the Board.

Alternatively, the proponent requests that the Board designate the federally recognized Ketchikan Indian Community Service Area as rural. This proposed alternative appears to request that, if Ketchikan as a whole cannot be designated rural, only tribal members residing within the Ketchikan Indian Community Service Area be designated rural. The geographic extent of the Ketchikan Indian Community Service Area appears to be substantially larger than the current nonrural Ketchikan Area, encompassing the same approximate boundaries as the Ketchikan Gateway Borough, excluding Saxman. Available information suggests there are no means to geographically separate the KIC Service Area from the Ketchikan Gateway Borough. Currently, there are no provisions in ANILCA that would allow the Board to designate only some residents of an area as rural. Therefore, OSM did not present this as an alternative for consideration in this analysis. Under the current provisions in ANILCA, this alternative would not reduce the size of the population that might become federally qualified subsistence users if the Ketchikan Indian Community Service Area were to be designated rural, because rural status would have to be applied to all residents of this area (see **Appendix A** for further explanation).

DISCUSSION

The proponents explain that the Ketchikan Area has a long history of indigenous occupation, subsistence traditions/traditional food practices, and reliance upon natural resources. Ketchikan lies within the traditional territory of the Tlingit and is comparable in geographical extent and/or population size to Alaskan communities like Sitka, Kodiak, and Bethel, which the Board currently recognizes as rural. The proponents also note that the nearby community of Saxman has rightfully been disaggregated from the rest of the Ketchikan Area, and currently enjoys rural status in the Federal Subsistence Management Program. Further, the proponents explain that the population of Ketchikan has declined in recent years, and that the community is already considered rural by several other Federal departments, agencies, and programs.

The proponents note that Ketchikan is relatively remote, being inaccessible by the road system to the rest of the state and country. As a result, access to non-traditional foods is generally limited to privately-owned barges that can be delayed by inclement weather and supply chain disruptions. There are also no large-scale agricultural systems or livestock operations in the area that might provide a safeguard against interruptions in shipping. Further, one of the three principal grocery wholesalers in the area was destroyed by a rockslide in 2019. Consequently, food security has become an increasing concern in recent years.

These concerns were highlighted by the substantial shipping difficulties and associated food shortages witnessed in the community during the COVID-19 pandemic.

The proponents value the traditional wild foods of the area as critical to the health and survival of all its residents and believe that it is now very important to remove the non-rural designation of the Ketchikan Area as it is a significant impediment to food security and subsistence ways of life here. The proponents also argue that this impediment to local food security and subsistence ways of life is preventing the Federal government from fulfilling its obligations to protect the physical, economic, traditional, and cultural existence of the Alaska Natives who live here, as noted in section 801 of the Alaska National Interest Lands Conservation Act (ANILCA).

Extent of Federal Public Lands

Unit 1A is composed of approximately 90% Federal public lands, all of which are US Forest Service managed lands (see **Figure 1**).

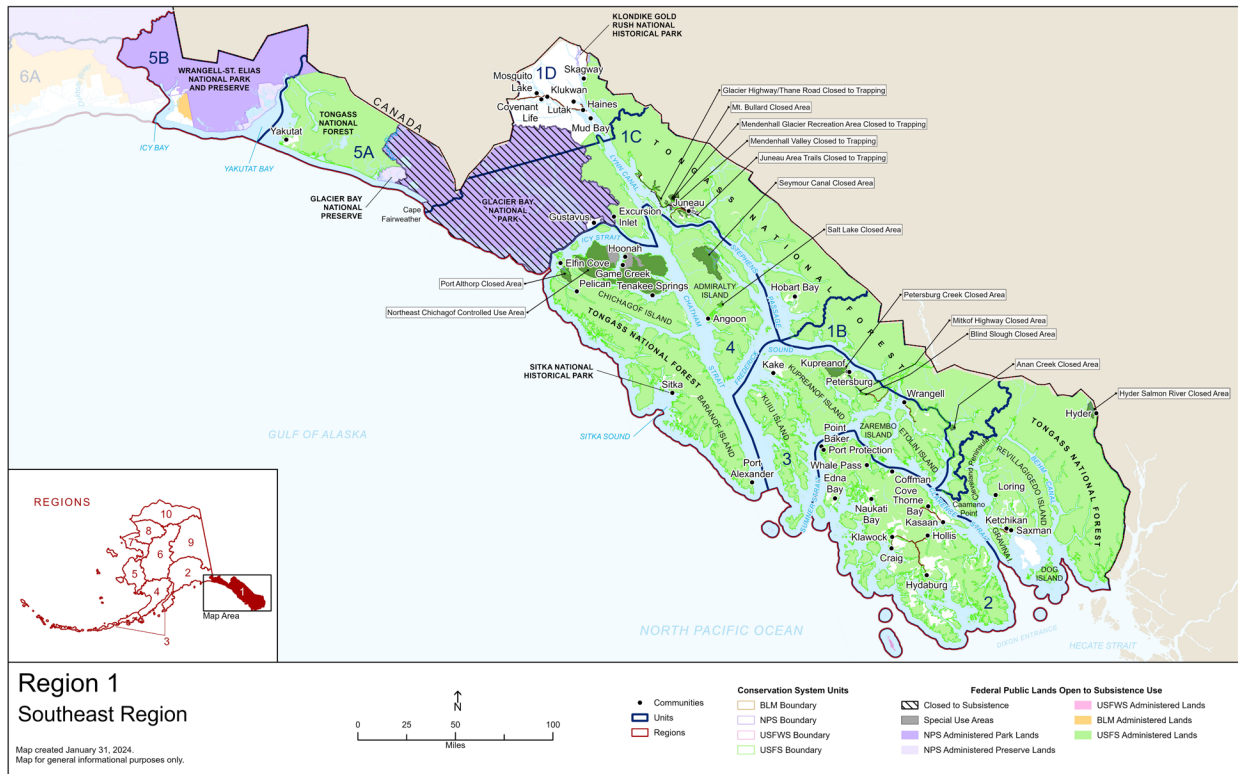


Figure 1. Federal Lands in Southeast Alaska (for informational purposes only).

Regulatory History

Executive Summary: The Ketchikan Nonrural Area

Ketchikan has been designated a nonrural area from the start of the Federal Subsistence Management Program (FSMP) in the 1990s. The boundaries of the nonrural Ketchikan area on Revillagigedo Island have not changed since the FSMP began, but Pennock Island and parts of Gravina Island have been added

to the nonrural area over time. The Board twice voted to include the community of Saxman in the nonrural Ketchikan area, but both of those actions were rescinded before being enforced. When the Board rescinded this decision for the second time, the decision to include all communities connected by road to Ketchikan City within the nonrural area was also rescinded. This is the first determination of the rural status of the Ketchikan Area since the Board updated its guidelines on nonrural determinations in 2015. The bullet points below summarize the history of actions regarding rural status determinations for Ketchikan. The section that follows explains this history in more detail.

- **October 1990:** The Board initially proposed that the nonrural Ketchikan Area would include the cities of Ketchikan and Saxman, parts of Pennock Island, and the Census Designated Places (CDPs) of Clover Pass, North Tongass Highway, Ketchikan East, Mountain Pass, Herring Cove, and Saxman East (55 FR 40898, October 5, 1990).
- **January 1991:** In response to public testimony, the Board voted to exclude Saxman from the nonrural Ketchikan area (56 FR 236-238, January 3, 1991).
- **July 1992:** The nonrural Ketchikan Area was formally defined as including Ketchikan City, Clover Pass, North Tongass Highway, Ketchikan East, Mountain Pass, Herring Cove, Saxman East, and parts of Pennock Island (57 FR 22940-64, May 29, 1992).
- **June 2002:** Corrections were made to the description of the Ketchikan Area, changing “Mountain Pass” to “Mountain Point”, and including “parts of Gravina Island” (67 FR 30561, May 7, 2002).
- **December 2005:** As part of a required decennial review of rural determinations, the Board voted to (1) re-evaluate the Ketchikan Area’s status as nonrural, (2) conduct further analyses to consider whether Saxman should be aggregated as part of the Ketchikan Area, and (3) conduct further analyses to consider whether recently developed communities north and south of the nonrural boundary should be aggregated as part of the Ketchikan Area (FSB, December 2005).
- **June 2006:** The Board voted to propose that the Ketchikan Area be modified to include Pennock Island, parts of Gravina Island, and all areas connected by road to Ketchikan City except Saxman (71 FR 46417, August 14, 2006).
- **May 2007:** The Board voted in December 2006 to modify the nonrural Ketchikan Area to include Pennock Island, parts of Gravina Island, and all areas connected by road to Ketchikan City, including Saxman. This decision stated that future road connected portions of the Ketchikan Area would also be considered nonrural (72 FR 2695, May 7, 2007). Ketchikan Indian Community (KIC) submitted a request that this decision be reconsidered, which the Board did not support.
- **March 2012:** Because a review of the Federal Subsistence Program’s rural determination process was initiated in January 2012, the Board voted to extend the compliance date for its 2007 nonrural determinations until after the review was complete, or in 5 years, whichever came first (77 FR 12477 March 1, 2012).
- **November 2013:** The Board published another extension of the compliance date for its 2007 nonrural determinations (78 FR 66886, November 7, 2013).
- **November 2015:** At their July 2015 meeting, the Board voted unanimously to revert to pre-2007 rural determinations (80 FR 68248, November 4, 2015). This meant that Saxman and the communities north and south of the nonrural Ketchikan Area boundary effectively never lost their rural status. These areas remain rural today.

Regulatory History in Detail: Background on the Rural Concept in ANILCA

Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) does not explicitly define “rural”, possibly because in early drafts of ANILCA, the subsistence priority was not explicitly limited to rural residents. In early drafts, the legislation emphasized the need to ensure that Alaskans would have the option to continue to practice subsistence lifestyles in the future (House Report 95-1045 (1978: 186)). In these drafts, the concept of “subsistence uses” was defined as:

The customary and traditional uses in Alaska of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles (including clothing) out of nonedible by-products of fish and wildlife resources taken for personal or family consumption, or for the customary trade or barter among subsistence users for personal or family consumption. (House Report 95-1045 1978: 28)

Congress noted that the phrase “customary and traditional” was intended to protect subsistence uses “in 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” (House Report 96-97: 280). Particular emphasis was placed on the subsistence uses of Alaska Natives, who were recognized as having “long-standing and historic use of...large areas of land around their historic villages for hunting, fishing, trapping, berry gathering, and other subsistence use purposes” (House Report 95-1045 1978: 187). Although the subsistence priority in these drafts was not explicitly limited to rural areas, Congress did recognize that rural residents were more dependent on subsistence resources and noted that management should cause the least adverse impact on rural residents who “traditionally and consistently” depended on these resources (House Report 95-1045 1978: 27).

It was not until later drafts of ANILCA that the definition of “subsistence uses” was explicitly delimited to activities conducted by rural Alaskans. Senate Report 96-413 explained that “by its very nature ‘a subsistence use’ is something done only by Native and non-Native residents of ‘rural’ Alaska (Senate Report 96-413 1979: 233). This change was not unanimously supported by members of Congress, with dissenting opinions stating that the change was made because the governor of Alaska had expressed concern about the State’s ability to implement a subsistence priority based on race (House Report 96-97 1979: 542-543), because this type of priority might violate State constitutional clauses prohibiting preferential access and use of natural resources (e.g. Article VIII, Sections 3, 15, 17). Still, the version of ANILCA eventually adopted by congress prescribed a rural priority for subsistence harvests. As such, the Federal Subsistence Board (FSB) has never had the authority to grant Native preference for the subsistence harvest of fish and wildlife resources in Alaska.

Senate Report 96-413 did not provide a specific definition of the word “rural” or describe criteria to be used for identifying rural communities in Alaska. The Report (96-413) did, however, identify Anchorage (population of 174,431 in 1980), Juneau (19,528), Fairbanks (53,983), and Ketchikan (7,198) as examples of nonrural communities. It also identified Barrow (population of 2,207 in 1980), Kotzebue (2,045),

Nome (2,301), Bethel (3,576) and Dillingham (1,563) as examples of rural communities. Report 96-413 further explained that the rural nature of such communities was not a static condition and could change.

The Ninth Circuit Court of Appeals also provided some guidance on the definition of rural in its 1988 decision in the *Kenaitze Indian Tribe v. State of Alaska* case. Specifically, the Court ruled that communities could be considered rural even if they were characterized by a commercial/cash economy. In 1986, the Alaska Legislature had defined “rural area” as “a community or area of the state in which the noncommercial, customary, and traditional use of fish or game for personal or family consumption is a principal characteristic of the economy of the community or area” (16.05.940(25)(1987)). This definition substantially narrowed the areas where subsistence harvesting might be afforded a priority under ANILCA, by excluding communities or areas from rural designation if they could be shown to be dominated by a cash economy. When reviewing the State’s 1986 revised definition of rural, and the impact of this revised definition on the implementation of the subsistence priority required under ANILCA, the Court noted, “The state's definition causes subsistence users who happen to live in areas with a primarily cash economy to be denied the subsistence priority, and would exclude many areas in the United States that one would consider rural...[Rural] is a standard word in the English language commonly understood to refer to areas of the country that are sparsely populated, where the economy centers on agriculture or ranching . . . More broadly, rural is the antonym of urban and includes all areas in between cities and towns of a particular size” (*Kenaitze Indian Tribe v. State of Alaska* 1988). The Court further noted:

The term [rural] has been used by the Federal government in a variety of other contexts, all of them consistent with conventional understanding. The U.S. Census Bureau, for example, divides the population into two categories. The urban population consists of people living in communities of 2,500 or more, while the rural population comprises everyone else... Many federal statutes use the word rural in its conventional sense. *See, e.g.*, 42 U.S.C. §1395ww(d)(2)(D) (Supp. IV 1986) (for purposes of computing Social Security payments to hospitals for inpatient hospital services, "rural area" is defined as any area outside a metropolitan area); 42 U.S.C. § 1490 (Supp. IV 1986) (for purposes of applying Title V of Housing Act of 1949, "rural area" is defined as "any open country, or any place, town, village, or city which is not part of or associated with an urban area" and where the population does not exceed certain limits). The Federal Communications Commission and the Federal Housing Administration similarly define rural in terms of an area's population... We are aware of no federal statute or regulation that uses the word rural in any sense other than the commonly accepted one.

Over the course of the history of the Federal Subsistence Management Program (FSMP) in Alaska, the concept of rural has primarily been defined by what it is not – urban/nonrural. As referenced in the court case above, human population figures played a large role in the early nonrural determinations made for various communities and areas in Alaska. Over time, there has been an effort to make rural/nonrural status determinations more holistically, in a way that incorporates a greater number of demographic, economic, and geographic factors, while also better accounting for regional variations through greater consultation and incorporation of input from Regional Subsistence Advisory Councils, Alaska Native tribes and corporations, and the public.

Rural and Nonrural Determinations in the Federal Subsistence Management Program in the 1990s

The Department of the Interior and the Department of Agriculture assumed responsibility for the implementation of Title VIII of ANILCA from the State of Alaska on July 1, 1990, following the *McDowell vs. State of Alaska* 1989 decision. To implement this program, the Board was required to determine the rural or nonrural status of all areas or communities within Alaska no later than December 31, 1990 (55 FR 27114–27170, June 29, 1990). Public meetings were held in approximately 56 communities throughout Alaska prior to this deadline, to solicit input on the Federal Subsistence Management Program and rural determination process (FSB 1990). In addition to public comments received at these meetings, the Board also received 150 written comments from 34 government entities, 73 comments from individuals, and 33 comments from other organizations (FSB 1990: 21). The Board made its initial rural/nonrural status determinations using the following guidelines:

- A community or area with a population of 2,500 people or less will be presumed to be rural, unless such a community or area possesses significant characteristics of a nonrural nature or is part of an urbanized area.
 - The metric of 2,500 people was selected because it was the figure used by the U.S. Census Bureau to divide rural from nonrural (FSB 1990: 22).
- A community or area with a population of 7,000 or more people will be presumed to be nonrural, unless such a community or area possesses significant characteristics of a rural nature.
 - This threshold was chosen because Ketchikan City, the smallest of the communities described as nonrural in the 1979 Senate report, had a population of just over 7,000 when ANILCA was passed (56 FR 2, January 3, 1991). The Board interpreted the rural and nonrural examples provided in the 1979 Senate Report as indications of congressional intent, and this is the reason why the threshold of 7,000 was chosen for nonrural communities/areas in Alaska (FSB 1990: 22). The 7,000 figure was also chosen because it was the original population threshold for nonrural communities used by the State of Alaska and certified by the Secretary of the Interior when the State was implementing Title VIII (FSB 1991: 109).
- Mid-range communities or areas with populations between 2,500 and 7,000 people will not be presumed rural or nonrural. The rural or nonrural status of these mid-range communities will be determined before other areas or communities are reviewed. Community or area characteristics will be considered in evaluating a mid-range community's rural or nonrural status. These characteristics may include, but are not limited to:
 - Use of fish and wildlife; and development and diversity of: the economy, transportation, communication links, educational and cultural institutions, and government institutions.
- Population data from the most recent census conducted by the United States Bureau of Census, as updated by the Alaska Department of Labor, will be utilized in this rural/nonrural determination process.
- Communities or areas that are economically and socially integrated will be considered a collective whole, and their rural/nonrural status will be determined according to the population numbers and associated characteristics of the whole area or collective set of communities.

In 1990, Ketchikan City had a population of approximately 8,263 people, while the larger Ketchikan Gateway Borough had a population of 13,828 people (US Census 1990). The Board included the “Ketchikan Area” described below in its tentative list of proposed nonrural communities/areas in Alaska in October 1990 (55 FR 40898, October 5, 1990):

1. Adak
2. Municipality of Anchorage
3. Kenai Area, including Kenai, Soldotna, Sterling, Nikiski, Salamatof, Kalifornsky, Kasilof, and Clam Gulch
4. Wasilla/Palmer Area, including Wasilla, Palmer, Sutton, Big Lake, Houston, and Bodenbergs Butte
5. Fairbanks North Star Borough
6. Juneau Area, including Juneau, West Juneau, and Douglas
7. **Ketchikan Area**, including Ketchikan City, Clover Pass, North Tongass Highway, Ketchikan East, Mountain Pass, Herring Cove, *Saxman*, Saxman East, and parts of Pennock Island
8. Kodiak Area, including Kodiak City, the Coast Guard Station, and Chiniak
9. City of Sitka, the contiguously developed area, the maintained road system, and the inhabited islands in Sitka Sound.
10. Homer Area, including Homer, Anchor Point, Kachemak City, and Fritz Creek
11. Seward Area, including Seward and Moose Pass
12. Valdez

On December 18, 1990, The Board agreed to overturn proposed nonrural determinations for Sitka, Saxman, and Kodiak. Board Chair McVee noted in a press release that “The Board’s final consideration of the three communities was significantly influenced by the extensive public testimony presented to the Board” (56 FR 236–238, January 3, 1991). The Board reviewed written comments, summaries from 57 public meetings, and heard additional testimony at the Board meeting. The Chair stated, “The three communities were borderline cases when considering the characteristics used to separate rural and nonrural communities and deserved further Board consideration” (56 FR 236–238, January 3, 1991). The Board received approximately 68 written comments on the proposed nonrural determinations (FSB 1990). Of these 68 comments, 19 were submitted in reference to Sitka, 3 were submitted in reference to Ketchikan, and the remaining 46 referred to other areas/communities (FSB 1990). The Board member from the Bureau of Indian Affairs also urged the Board to determine that Sitka, Kodiak, and Saxman were rural (FSB 1990: 10). Because they were somewhat similar in terms of population size at the time, many testifiers to the Board noted differences in the character of Sitka compared to that of Ketchikan (FSB 1990):

- Sitka exhibited a high level of wild resource harvest and use, with subsistence being a key component of the local economy
- Sitka was the center of trade in subsistence goods in Southeast Alaska
- Sitka had a substantially larger population of Alaskan Native individuals than Ketchikan
- There were substantially more vehicle registrations and tax revenues in Ketchikan than Sitka
- Ketchikan had a substantially higher population density than Sitka

- It was inappropriate to compare the overall population of Sitka City and Borough to that of Ketchikan City alone. It would be more accurate to compare the population of Sitka City and Borough to that of the Ketchikan Gateway Borough
- The State Joint Boards of Fish and Game had previously determined Sitka and Saxman to be rural communities, and commenters were unclear what had changed in a relatively short period of time to make them nonrural communities
- Ketchikan produced commercial goods and had more industry than Sitka
- Ketchikan was the hub for trade and transport of commercial goods in Southeast Alaska

In January 1991, the Board issued a revised list of nonrural communities and areas (56 FR 238, January 3, 1991). This process was significant for the determination of rural subsistence priorities on Federal public lands in Alaska because all communities and areas not included on this list were to be considered rural by the Federal Subsistence Management Program. The proposed nonrural determinations for Sitka, Kodiak, and Saxman were overturned. However, the “Ketchikan Area,” excluding Saxman, remained on this revised list of nonrural areas and communities (see also **Figure 2**):

1. Adak
2. Municipality of Anchorage
3. Kenai Area, including Kenai, Soldotna, Sterling, Nikiski, Salamatof, Kalifornsky, Kasilof, and Clam Gulch
4. Wasilla/Palmer Area, including Wasilla, Palmer, Sutton, Big Lake, Houston, and Bodenbergs Butte
5. Fairbanks North Star Borough
6. Juneau Area, including Juneau, West Juneau, and Douglas
7. **Ketchikan Area**, including Ketchikan City, Clover Pass, North Tongass Highway, Ketchikan East, Mountain Pass, Herring Cove, Saxman East, and parts of Pennock Island
8. Homer Area, including Homer, Anchor Point, Kachemak City and Fritz Creek
9. Seward Area, including Seward and Moose Pass
10. Valdez

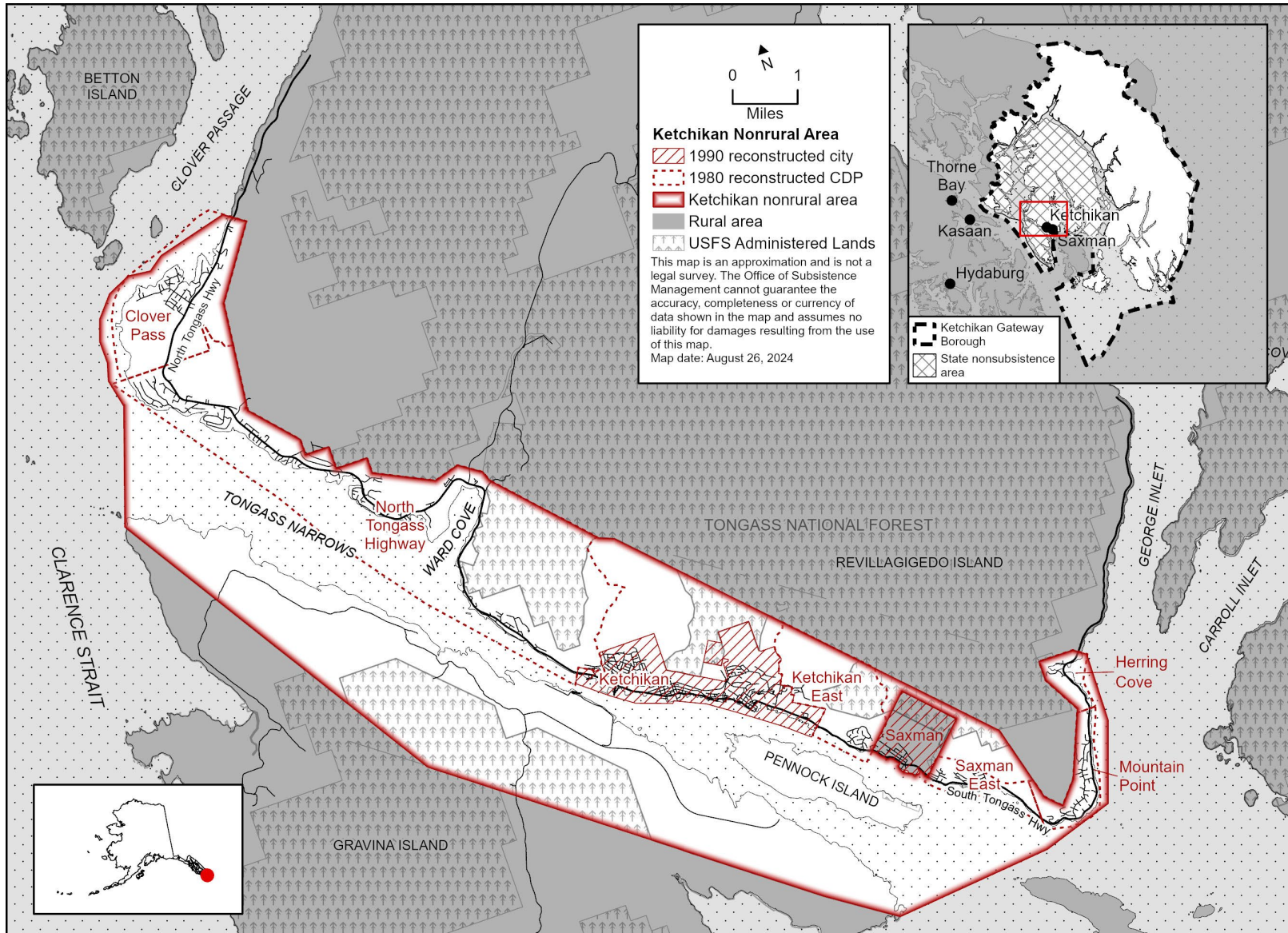


Figure 2. Current Ketchikan Nonrural Area with reconstructed CDPs (for informational purposes only).

The final Federal Subsistence Management regulations went into effect on July 1, 1992 (“Subsistence Management Regulation for Public Lands in Alaska, Subparts A, B, and C, Final Rule” 57 FR 22940-64, May 29, 1992). However, to mitigate the potentially drastic effects of a sudden loss of subsistence uses, the Secretaries of the Federal land management agencies in Alaska added a five-year grace period before a decision to change a community or area’s status from rural to nonrural would become effective. Additionally, the Board was directed to conduct periodic reviews of its rural determinations:

§ ____.15 *Rural determination process.*

(b) The Board shall periodically review rural determinations. Rural determinations shall be reviewed on a ten-year cycle, commencing with the publication of the year 2000 U.S. census. Rural determinations may be reviewed out-of-cycle in special circumstances. Once the Board makes a determination that a community has changed from rural to nonrural, a waiting period of five years shall be required before the nonrural determination becomes effective.

Rural and Nonrural Determinations in the 2000s

In May 2002, the Federal Register announced corrections to the description of the nonrural Ketchikan Area, changing “Mountain Pass” to “Mountain Point,” and including “parts of Gravina Island” (67 FR 30561, May 7, 2002). Gravina Island is located across the Tongass Narrows, and part of the island is the site of the Ketchikan International Airport. Public testimony received in 2006 suggested that around 300 people lived on Gravina Island at the time (FSB 2006: 175), and that the Bostwick Inlet side of Gravina Island had long been an important subsistence use area for residents of Ketchikan, Saxman, Metlakatla, and other nearby communities (USDA 2004). Bostwick Inlet is currently located outside the nonrural Ketchikan Area.

In 2005, as part of their required decennial review of rural determinations, the Board decided that more information was needed to evaluate whether Saxman and outlying communities that had been connected to the Ketchikan road system since the previous 1990 rural determinations should be aggregated with the rest of the Ketchikan Area. The communities located along the Tongass Highway north and south of the nonrural boundary, included: Waterfall, North Tongass, and South Tongass (FSB 2006). At this time, the Board’s criteria for aggregating communities included:

1. Being connected by a road system
2. Having a shared high school
3. Having 30% or more of the working population commuting to the adjacent community for work

The nonrural Ketchikan Area was believed to encompass the entire paved road system when it was initially established by the Federal Subsistence Management Program in the 1990s (OSM 2006). However, it became clear during the Board’s decennial review that the road system had expanded since that time, and that communities had developed beyond the previous CDP and road network boundaries (OSM 2006). Public testimony provided in 2006 also clarified that many of these roads existed previously but had been upgraded from gravel to paved surfaces sometime before 2005 (FSB 2006: 9).

In June 2006, the Board voted to propose that the nonrural Ketchikan Area be modified to include the entire road system connected to the City of Ketchikan, as well as Pennock Island and parts of Gravina Island (71 FR 46417, August 14, 2006). When reviewing the status of the outlying communities, the Board was unanimous in their decision to include the newly developed areas along the Tongass Highway as part of the nonrural Ketchikan Area. One Board member noted that “these currently rural areas are towards the north and south ends of the Tongass Highway. Neighbors on one side of the seemingly arbitrary line are different under Federal subsistence regulations than those on the other side of the line and I don’t believe that is right, and it is socially divisive” (FSB 2006: 185). A separate vote to also include Saxman in the nonrural Ketchikan Area did not pass (FSB 2006).

In August 2007, the Board published new rural determinations based on their decennial review. Using the three criteria for aggregation, the Board decided to adjust the boundaries of the nonrural Ketchikan Area to include Saxman, Pennock Island, parts of Gravina Island, and all road-connected areas (72 FR 25688, May 7, 2007). In this case, the Board’s decision differed from the 2006 proposed rule and made a determination to group all of the road connected portions of the Ketchikan Area together as nonrural (72 FR 256293, May 7, 2007). The Board provided further justification (72 FR 25695, May 7, 2007), noting that this “action also treats any future developed areas connected to the road system the same as the existing road system (i.e., future road connected portions of the Ketchikan Area would also be considered nonrural). This decision to include Saxman in the Ketchikan nonrural area was contentious even among Board members, and it was primarily based on concerns that excluding Saxman would not be a legally defensible action (FSB 2006).

The Southeast Alaska Subsistence Regional Advisory Council (Southeast Council) Chair and public testers spoke against this decision to include Saxman in the nonrural Ketchikan Area at the time, noting that coming to a determination that differed from the 2006 proposed rule did not allow for sufficient public input (FSB 2006). The Southeast Council Chair also reiterated the Council’s support for both Saxman and Ketchikan to be designated rural, noting that recent harvest data provided by a 2005 Ketchikan household harvest survey (see Garza et al. 2006) provided “an indication of the subsistence orientation of Ketchikan” (FSB 2006: 154). Throughout this decennial review of rural determinations, the Southeast Council provided repeated support for both Ketchikan and Saxman to be considered rural. The Southeast Council’s statements in support of Ketchikan’s rural status primarily focused on the economic changes that had occurred in the area following the closure of the Ketchikan Pulp Mill in 1997, and the results of the 2005 household harvest survey showing that Ketchikan residents harvested substantially more subsistence resources than previously estimated by ADF&G.

In response to the Board’s 2007 decision, Ketchikan Indian Community submitted a formal request that Ketchikan’s status as a nonrural community be reconsidered (RFR 07-05). The Board did not support this request, and Ketchikan’s nonrural status was not reconsidered.

Secretarial Review of the Federal Subsistence Management Program and Rural Determination Process

In October 2009, the Secretary of the Interior, with concurrence from the Secretary of Agriculture, initiated a Subsistence Program Review that included a directive for the Board to review the process for

rural determinations with Regional Advisory Council input. The Board initiated its review of the rural determination process, as well as its previously completed decennial rural determinations review in 2012. As a result, the Board determined that it was in the public's best interest to extend the compliance date of its 2007 final rule on nonrural determinations until after the review of the rural determination process and decennial review was complete, or in 5 years, whichever came first. An additional extension of the compliance date for the Board's 2007 nonrural determinations was published in the Federal Register on November 7, 2013 (78 FR 66886, November 7, 2013).

During this review process, the Board solicited public comments and held public meetings across the state. Substantive comments indicated a broad dissatisfaction with the rural determination process, which included the criteria for community/area aggregation, rural/nonrural population thresholds, and the decennial rural determinations review. Based on Regional Advisory Council input, public comments, Tribal and ANCSA consultations, and OSM briefings, the Board forwarded a proposal to change the rural determination process.

The "Subsistence Management Regulations for Public Lands in Alaska; Rural Determination Process" was subsequently published in the Federal Register on November 4, 2015 (80 FR 68249, November 4, 2015). In it, the revised regulations governing the rural determination process and the 2009 secretarial review were described. The summary of these revised regulations states:

The Secretaries have removed specific guidelines, including requirements regarding population data, the aggregation of communities, and a decennial review. This change will allow the Board to define which communities or areas of Alaska are nonrural (all other communities and areas would, therefore, be rural). This new process will enable the Board to be more flexible in making decisions and to take into account regional differences found throughout the State. The new process will also allow for greater input from the Subsistence Regional Advisory Councils (Councils), federally recognized Tribes of Alaska, Alaska Native Corporations, and the public (80 FR 68249, November 4, 2015).

With the revisions to the rural determination process completed, the "Subsistence Management Regulations for Public Lands in Alaska; Rural Determinations, Nonrural List" was also published in the Federal Register in November 2015 (80 FR 68248, November 4, 2015). The final outcome of this process was that all pending rural and nonrural determinations reverted back to pre-2007 regulations, except for the community of Adak. Adak gained rural status in accordance with Board's 2007 ruling. Because the other 2007 Board rulings never officially went into effect, Saxman and the outlying communities located along the more recently expanded Ketchikan road network retained rural status. Therefore, Saxman and these outlying communities have effectively remained rural status communities since the Board finalized its initial rural determinations in 1992. However, the rest of the Ketchikan Area is currently considered nonrural by the Federal Subsistence Management Program. It is described below:

- **Ketchikan Area**, including Ketchikan City, Clover Pass, North Tongass Highway, Ketchikan East, Mountain Point, Herring Cove, Saxman East, Pennock Island, and parts of Gravina Island

The Board formally approved the new policy on nonrural determinations on January 11, 2017. In 2018, the Kenaitze Indian Tribe submitted a proposal requesting that they be designated a rural community for the purposes of the FSMP. The Board determined this proposal invalid, noting that changes to the nonrural determination policy were not intended to change how “community” was defined and that Title VIII of ANILCA does not permit for a tribal subsistence preference. In 2021, the Board adopted proposal RP19-01, changing the status of Moose Pass (defined as including the CDPs of Moose Pass, Crown Point, and Primrose) to a rural community, independent of the greater Seward Area. The nonrural status of the Ketchikan Area has not changed since the initial nonrural determinations were finalized in 1992. Similarly, Saxman has effectively remained a rural status community since these initial determinations were finalized in 1992. Proposal NDP25-01 is the first proposal to formally request a status review determination for the Ketchikan Area. The rural or nonrural status of the Ketchikan Area will now be determined according to the 2015 revised policy on rural determinations.

Current Events

Three public hearings have been convened to receive public comment on NDP25-01. The first public hearing took place at the Southeast Alaska Discovery Center in Ketchikan on October 18, 2023 (OSM 2023a). The second public hearing on NDP25-01 took place at the Prince of Wales Vocational and Technical Education Center in Klawock on October 23, 2023 (OSM 2023b). The third public hearing on NDP25-01 was a virtual meeting that took place online and over the phone on February 6, 2024 (OSM 2024). Public testimony on NDP25-01 was also received at the Southeast Council meetings in Ketchikan on October 25-27, 2022, Klawock on October 24-26, 2023, and at the Federal Subsistence Board meeting in Anchorage on January 31-February 3, 2023. Additional public testimony on NDP25-01 was also received at the Southeast Council meeting in Ketchikan on October 22-24, 2024, and is expected to be received at the Federal Subsistence Board regulatory meeting in Anchorage in 2025.

Seven people testified at the Southeast Council meetings held in Ketchikan on October 25-27, 2022. An additional three people submitted written comments that were read into the record at this meeting (SERAC 2022a). All ten testimonies received at this meeting were in favor of the proposal (NDP25-01), and all testifiers were Ketchikan residents and/or KIC members (SERAC 2022a).

Thirty-six people attended the public hearing in Ketchikan in-person or via teleconference on October 18, 2023 (OSM 2023a). Seventeen attendees provided testimony at this hearing. Most of the testifiers at this meeting were Ketchikan residents and/or KIC members, and they were in favor of the proposal (NDP25-01) to change Ketchikan to a rural status community (OSM 2023a). Testifiers who opposed the proposal were from Prince of Wales Island (POW) (OSM 2023a).

Forty-six people attended the public hearing in Klawock in-person or via teleconference on October 23, 2023 (OSM 2023b). Eleven attendees provided testimony at this hearing. Most of the testifiers at this meeting were from POW and they were opposed to the proposal (NDP25-01) to change Ketchikan to a rural status community (OSM 2023b). Those in favor of the proposal at this meeting were Ketchikan residents and/or KIC members.

Twenty-one people attended the virtual public hearing that took place on February 6, 2024 (OSM 2024). Ten of these attendees provided testimony. All of the individuals who testified at this meeting were in favor of the proposal (NDP25-01) to change Ketchikan to a rural status community. Most of the testifiers were Ketchikan residents and/or KIC members.

Twenty-four people provided public testimony at the Southeast Regional Advisory Council meeting held October 25-27, 2024. Most of the testifiers were Ketchikan residents and/or KIC members. A smaller number of testifiers were residents of POW. Those who testified in favor of the proposal were primarily Ketchikan residents and/or KIC members, while those who were opposed to the proposal were primarily from POW.

Many of the testifiers at these public hearings and Southeast Council meetings who were in favor of the proposal (NDP25-01) were residents of Ketchikan and/or members of KIC. These testifiers supported the proposal because they noted that attaining rural status would help them maintain and build their cultural traditions that have long been based in subsistence/traditional food practices. Some testifiers noted that making it easier to maintain cultural traditions was very important to help support community mental health, especially among school-aged children. They also explained that the Federal subsistence priority accorded to rural residents would improve their ability to access traditional subsistence resources in their area, such as Eulachon in the Unuk River. Federal subsistence priority would also reduce the amount time and money required for Ketchikan residents to harvest subsistence resources, because they can currently only access these resources under State regulations in areas further away and with smaller harvest limits. Larger harvest limits and more accessible resources would also enable Ketchikan residents to share subsistence harvests in a manner more appropriate to traditional food practices (see Haven 2022, also DiNovelli-Lang 2010).

KIC members also emphasized that Alaska Natives in Ketchikan should not be restricted in their efforts to continue their traditional cultural and economic practices just because they happen to live in Ketchikan. Testifiers further explained that rural status could help protect local resources from those who come from outside to hunt and fish in the Ketchikan Area. Many testifiers who were in favor of the proposal also emphasized the food security and supply chain issues they had experienced during the recent COVID-19 pandemic, explaining that the pandemic highlighted the relatively remote and isolated nature of Ketchikan as well as the need for Ketchikan residents to be able to utilize all possible means to engage in subsistence practices to provide for their families.

Many of the testifiers at these public hearings and Southeast Council meetings who were opposed to the proposal noted that, on average, Ketchikan residents do not generally depend upon subsistence resources to the same degree that residents of nearby rural communities depend upon them. These testifiers further explained that they did not consider Ketchikan to be rural because it is a relatively large, developed community with greater socioeconomic services and opportunities, as well as a substantially larger population than most other communities in the region. Testifiers noted that Ketchikan has several supermarkets, a hospital, a US Coast Guard Base, a university, large dock facilities that supplies are regularly shipped into, substantial fishing and tourism industries, and stores where consumer goods can be purchased more cheaply and easily than in other nearby communities.

Many of the meeting attendees testifying in opposition to the proposal were POW residents, who were concerned that the fish and wildlife resources in and around POW would not be able to support the higher number of hunters and fishers who would be able to harvest under Federal regulations if the entire population of the Ketchikan Area were to gain rural status. Testifiers from POW were particularly concerned about the potential impacts of Ketchikan residents coming to POW to hunt deer under Federal subsistence regulations. However, KIC members assured POW residents that it was not their intention to come to POW to harvest subsistence resources if Ketchikan were to be granted rural status. KIC members noted that they wanted to attain rural status so that they could conduct subsistence harvesting activities more easily and efficiently in their home area. Testifiers from POW emphasized that the lack of provisions in ANILCA to designate only some residents of a community or area as federally qualified subsistence users was pitting “tribe against tribe” again (OSM 2023b; SERAC 2023).

OSM met with KIC staff on June 25, 2024. At this time KIC shared two research reports on subsistence in Ketchikan with OSM. These reports provided information for this analysis and were included in the Supplemental Materials packet distributed as part of the Southeast Council’s meeting book for its October 22-24, 2024, meeting. OSM, KIC and Tribes from POW subsequently worked to set a Tribal Consultation in September 2024. KIC cancelled this consultation with input from the other Tribes.

Nonrural Decision Making Criteria

The new Nonrural Determination Policy does not provide an explicit checklist for determining whether a community or area is rural or nonrural. Instead, the Board uses a comprehensive approach, including consideration of information provided by the public. The Board also relies upon the appropriate Regional Advisory Council(s) to confirm relevant information and to identify the unique characteristics of a rural community in their region. The following text, taken directly from the Policy, shows many of the key directives guiding this analysis. The Board’s Nonrural Determination Policy states:

The Board will make or rescind nonrural determinations using a comprehensive approach that may consider such factors as **population size and density, economic indicators**, military presence, industrial facilities, **use of fish and wildlife**, degree of **remoteness and isolation**, and any other relevant material **including information provided by the public**. As part of its decision-making process, the Board may compare information from other, similarly situated communities.

When acting on proposals to change the nonrural status of a community or area, the Board shall:

- Proceed on a case-by-case basis to address each proposal regarding nonrural determinations;
- Base its decision on nonrural status for a community or area on **information of a reasonable and defensible nature contained within the administrative record**;
- Make or rescind nonrural determinations based on **a comprehensive application of evidence and considerations presented in the proposal** that have been verified by the Board as accurate;
- Rely heavily on the recommendations from the affected Regional Advisory Council(s);
- Consider comments from government-to-government consultation with affected Tribes;

- Consider comments from the public;
- Consider comments from the State of Alaska;
- Consider comments from consultation with affected ANCSA Corporations;
- Have the discretion to **modify the geographical extent of the area** relevant to the nonrural determination; and
- Implement a final decision on a nonrural determination in compliance with the Administrative Procedures Act (APA).

The Board intends to rely heavily on the recommendations of the Regional Advisory Councils and recognizes that Council input will be critical in addressing regional differences in the nonrural determination process. **The Board will look to the Councils for confirmation that any relevant information brought forth during the nonrural determination process accurately describes the unique characteristics** of the affected community or region.

During the October 24-26, 2023, meeting of the Southeast Council, the Council provided suggestions to OSM staff on how to proceed with an analysis and what kinds of information the Council would find most helpful in assessing the rural characteristics of communities or areas in the Southeast region. Overall, Southeast Council members noted that the following types of information and considerations would be very important in assessing Ketchikan’s rural characteristics (SERAC 2023):

1. Ketchikan Area residents’ harvest and use of fish and wildlife
2. Economy and employment opportunities in Ketchikan
 - The differences between the Ketchikan economy when the timber industry and pulp mill were strong versus the situation today with a more tourism focused economy and declining fisheries industry
3. Access to grocery stores and other retail stores
4. Access to socioeconomic services like hospitals, airports, schools, post offices, ferry service....
5. The population of Ketchikan
 - Distinguishing between the populations of the Ketchikan Gateway Borough, Ketchikan City, and the KIC
 - The cultural/ethnic makeup of Ketchikan, specifically looking at the percentage of Alaska Natives living in the Ketchikan Area
 - Several Council members argued that ANILCA should help preserve indigenous traditions and livelihoods.
 - How many members of the KIC reside in the Ketchikan Area
6. Important to consider that Ketchikan is a hub community for smaller surrounding communities
 - Stores and services offered in Ketchikan are important and used by residents of surrounding rural communities.
 - Some stores and services in Ketchikan probably would not exist if not for use by residents of surrounding rural communities too.
7. Some Council members noted that the determination of whether Ketchikan should receive rural status should be made on its own merits, and not influenced by its potential impacts on fish and wildlife harvest opportunities for others.

- Impacts on fish and wildlife populations and harvest opportunities should be dealt with later using processes such as Section 804 analyses

These Council comments, along with guidance from the current Nonrural Determination Policy, provided direction for the analysis. Additionally, in discussing this proposal and analysis at their October 2024 meeting, the Council and members of the public provided some specific guidance on the types of characteristics that might distinguish “rural” and “nonrural” communities/areas in their region (SERAC 2024). Council members and public testifiers noted that nonrural communities may be characterized as those that (SERAC 2024):

- Rely less on subsistence resources for daily survival
- Have larger population sizes, more dense populations, and noise pollution
- Are more developed, including having more extensive road systems; more reliable and more frequent transportation services; and/or more frequent, reliable, and cheaper sources of commercial goods
- Have more robust economic sectors that offer more jobs and/or higher-paying jobs (e.g., tourism, commercial or charter fishing, logging and other resource industries, government sectors)
- Have modern amenities, such as large-scale stores, more retailers, larger health care facilities, and more public services
- Have a greater presence of seasonal residents and/or tourists, as well as larger, more expensive homes designed to house seasonal residents
- Have generally been pro-development over time

In contrast, rural communities may be characterized as those that (SERAC 2024):

- Rely on subsistence resources as a means of survival and livelihood, rather than as an economic supplement or source of recreation
- Have smaller or declining populations that are more spread out and not characterized by noise pollution
- Have histories of Native occupation, historical reliance on subsistence resources, and/or cultural use of subsistence resources
- Are relatively remote and rely on barges, planes, or ferries to bring in commercial goods, which results in higher costs of living and vulnerability to supply chain disruptions
- Have limited or reduced access to basic resources, services, and infrastructure (e.g., hospitals, transportation options, extent of road system, social services)
- Have limited or declining economies that are characterized by fewer economic opportunities, higher unemployment and poverty rates, housing shortages, and/or declining social services
- Face food insecurity due to lack of grocery stores, low stock in stores, reduced availability of protein in stores, and/or prohibitive costs of store-bought foods.

In this discussion, some Council members focused on how Ketchikan compared to nearby smaller communities like Metlakatla and those on POW, noting that Ketchikan did not possess the same number and degree of rural characteristics as these communities (SERAC 2024). However, other Council

members noted that it would be more appropriate to compare Ketchikan to larger communities already considered rural by the Board like Sitka and Kodiak, noting that by this standard Ketchikan could be considered a rural community (SERAC 2024). Overall, the Council’s discussion illustrated that Ketchikan currently possesses both rural and nonrural characteristics, and it represents a very difficult borderline case for rural/nonrural status determination.

The Ketchikan Area

Cultural and Economic History

The Ketchikan Area is located within the ancestral territory of the Tlingit (Gillispie 2018). People have been living in Southeast Alaska for over 10,000 years, with the earliest archaeological sites found on nearby POW (Erlandson et al. 1992, Gillispie 2018, Lindo et al. 2017, Thornton et al. 2010). The word Ketchikan comes from a Tlingit term that roughly translates to “thundering wings of an eagle” and is thought by some to refer to the way that glacial rivers resemble an eagle’s spread wingtip (Towle 2022). Tlingit oral histories state that the people originated from a large river and have occupied Southeast Alaska since time immemorial, with some scholars and Tlingit leaders suggesting that they initially migrated from Tsimshian [Ts’msyen] territory in British Columbia (Crone and Mehrkens 2013, Price 1990, Schurr et al. 2012). Some sources state that Haida territory includes POW south of the Klawock River across to Thorne Bay, part of Heceta Island, and all of Noyes, Lulu, San Fernando, Suemez, and Dall Islands, whereas others consider Haida territory to begin further south on POW (Moss 2008).

Archaeological evidence suggests that early residents of the area relied on a wide-array of natural resources for subsistence, including at least three species of salmon, fourteen marine fish species, twenty-one species of shellfish, Sitka black-tailed deer, bear, harbor seals, sea otters, and seabirds (Gillispie 2018, Moss 2007). Salmon and shellfish were the most heavily utilized resources, with wooden weirs for mass salmon harvest appearing as early as 3,200 years ago (Gillispie 2018). The most important shellfish species included blue mussels, butter clams, and Pacific littleneck clams (Gillispie 2018, McKechnie et al. 2014, Moss et al. 1989, Price 1990). Important marine fish species included herring, halibut, cod, rockfish, spiny dogfish, ratfish, and flatfish. Eulachon were also almost certainly important, though these species are typically harder to detect in the archaeological record due to their smaller size and the way that Eulachon oil processing tends leave behind little archaeological evidence (Magdanz 1988, Patton et al. 2019). Early historical records show that Tlingit peoples traded Eulachon oil and other resources with both coastal and interior communities, to the extent that trade routes were described as “grease trails” (de Laguna 1972, Magdanz 1988).

Pictograph, fish trap, and fish weir sites dating to both the pre-historic and historic periods show that Tlingit, Haida, and Tsimshian communities extensively occupied and used what is now the Ketchikan-Misty Fjords Ranger District of the Tongass National Forest (Smith 2011, Stanford 2011). Ethnohistoric data indicates that Tlingit communities harvested fish (particularly salmon), deer, bears, goats, seals, sea otters, porpoises, berries, roots, tubers, bark, bird eggs, seaweed, and shellfish in the early 1700s (Grinev 2005). There is substantial ethnohistorical evidence showing that both Tlingit and Haida communities actively managed marine resources to support fisheries habitat and bolster salmon and herring populations

(Thornton 2015, Thornton et al. 2015). These actions included transplanting herring and salmon eggs to encourage population growth, which likely played a major role in shaping the overall marine ecosystem (Thornton 2015, Thornton et al. 2015).

Russian exploration of Southeast Alaska began in the mid-1700s, at which point Tongass and Sanya (Cape Fox) Tlingit lived in the Ketchikan Area (ADF&G 1992, Price 1990). Tlingit and Haida communities traded extensively with Russian, American, and British traders through the period of the Alaska Purchase in 1867 (Price 1990). Gorsuch and colleagues (1994) report that throughout this time, Tlingit and Haida communities also maintained active salmon, Eulachon, and halibut fisheries in the area (ADF&G 2003, Price 1990).

The place that became Ketchikan City was originally founded in 1886 as a mining and fishing community (Tromble and Boucher 1997). The townsite was established on the southern end of Revillagigedo Island, along the Inside Passage that links the Gulf of Alaska to the Puget Sound. It was named after Ketchikan Creek, which runs through the center of Ketchikan and empties into the Tongass Narrows. Due to the historical importance of Ketchikan as a shipping port, the legacy of the fishing industry, and the typically rugged and steep terrain of the region, most of the built area of Ketchikan still exists in a long, narrow strip along the waterfront (see **Figure 2**).

Gorsuch and colleagues (1994: 47) note that, like other Southeast Alaska townsites, Ketchikan is “located in or near the site of Native settlements,” however, “the towns that grew up at these locations were essentially white towns.” Still, Sanya Tlingit occupied Yes Bay and Cape Fox, and Tongass Tlingit seasonally occupied both sides of the mouth of Ketchikan Creek, using the area as a summer fish camp to harvest pink salmon at the time of the Alaska Purchase in 1867 (Gorsuch et al. 1994). Native residents continued to rely on these tidelands, replacing smokehouses with frame houses and cabins in the early 1900s (Gorsuch et al. 1994). The Department of the Interior initially reserved tidal flats on either side of Ketchikan Creek for Native use, but development continued to occur along the Ketchikan waterfront, and by 1932, the Department decided that these lands should be held in trust for a future State government (Gorsuch et al. 1994).

When mineral prices dropped, Ketchikan’s economic focus shifted more to commercial fishing and fish processing businesses that were built at the mouth of Ketchikan Creek. The city of Ketchikan grew rapidly as the commercial fishing industry developed — increasing from 40 residents at its founding in 1886 to 460 residents by 1900 (ADF&G 1992, Price 1990, Tromble and Boucher 1997). A Native school and mission were constructed on Native land in the Ketchikan Area in the 1890s, and the growing economy attracted many Tsimshian people and a smaller number of Tlingit and Haida people to settle in the area. As the Native population grew, Native settlements south of the town’s commercial center expanded, becoming known as “Indian Town” (Gorsuch et al. 1994).

In the late 1880s, Tsimshian peoples migrated with Anglican missionary William Duncan to what is now Annette Island, which had previously been Sanya Tlingit lands (Gorsuch et al. 1994, Thornton et al. 2010). In the late 1890s, Saxman was formed through the Presbyterian Church and Territorial school authorities as a new Native Alaskan community located a few miles southeast of Ketchikan (Gorsuch et

al. 1994). Saxman was initially settled by Sanya Tlingit and was officially incorporated in 1929. The Presbyterian church at Saxman later relocated to Ketchikan because “much of Saxman’s early population moved there” (Gorsuch et al. 1994: 52). Native people continued to relocate to Ketchikan throughout the 1920s and 1930s (Gorsuch et al. 1994, Ketchikan Museums, n.d.). During this time, however, very few Native residents received land deeds, while most white residents did (Gorsuch et al. 1994). Land deeds began to be issued again in the late 1950s, but by this time much of the non-deeded land in the Ketchikan Area was no longer Native-occupied (Gorsuch et al. 1994).

Commercial fishing remained the primary economic driver in the Ketchikan Area throughout the first half of the 20th century (Gorsuch et al. 1994, Price 1990). Local Tlingit and Haida residents participated in commercial fisheries first as laborers at salteries, and later by selling/trading Pink Salmon to canneries (Price 1990). Native fish traps were prohibited in the late 1880s, but canneries were permitted to continue using fish traps. The use of commercial fish traps increased the production and efficiency of canneries, resulting in loss of commercial income and subsistence opportunity for Native peoples living in the area (Gorsuch et al. 1994, Price 1990). The harvest of salmon by industrial fish traps also led to significant declines in salmon stocks in the area (Central Council of Tlingit and Haida 1995, Price 1990). Tlingit and Haida residents spoke out against commercial fishing industries and were actively seeking legal subsistence rights as early as 1889 (Price 1990).

Salmon and herring harvests throughout the southeast region declined notably after the 1930s due to overfishing (Heard 2012, Thornton et al., 2010). These declines prompted many Native peoples living in smaller communities to pursue economic opportunities in larger “white towns” such as Juneau, Douglas, Ketchikan, Wrangell, Petersburg, or the continental United States. In 1947, The Tongass Timber Act facilitated logging and road construction in the region and led to the opening of the Ketchikan Pulp Company (KPC) mill in 1954 (ADF&G 1992, Beier et al. 2009, Dombrowski 2002). Ketchikan is located within the present-day Tongass National Forest, a large temperate rainforest composed of valuable species such as Western Red Cedar (*Thuja plicata*), Sitka Spruce (*Picea sitchensis*), and Western Hemlock (*Tsuga heterophylla*). The opening of the KPC mill, owned by the non-local company Louisiana Pacific, combined with the salmon decline prompted many Tlingit and Haida people, mostly from POW, to relocate to Ketchikan (Gorsuch et al. 1994). This influx of new residents led to a reactivation of the Ketchikan Indian Corporation, which was initially created in 1940, but had been inactive for several years prior to the opening of the pulp mill (Gorsuch et al. 1994). Logging became the main industry in Ketchikan following the establishment of the mill (Beier et al. 2009, Dombrowski 2002, Heard 2012, Thornton et al. 2010).

Prior to the 1971 Alaska Native Claims Settlement Act (ANCSA), the Central Council of Tlingit and Haida Indians received \$7.5 million in a settlement from the U.S. government as compensation for Tlingit and Haida lands that were lost due to colonization, state formation, and industrial development (*Tlingit and Haida Indians of Alaska v. U.S.*, 389 F. 2d 778). The communities of Douglas, Haines, Juneau, Ketchikan, Petersburg, Sitka, Skagway, and Wrangell were also determined to have similarly lost lands to mining, industrial development, homesteads, mineral leases, or white-established townsites, and were therefore entitled to receive compensation (Gorsuch et al. 1994). Notably, this decision stated that more than 2.6 million acres of Native occupied land in Southeast Alaska had not been taken or extinguished by

the Federal government (Gorsuch et al. 1994). It also noted that these Southeastern communities were not eligible to be compensated for lost fishing rights, which were valued at \$8.4 million at the time (Gorsuch et al. 1994).

Southeast Alaska communities received less land than other Alaska Native communities under the terms of ANCSA. The communities of Ketchikan, Haines, Petersburg, Tenakee, and Wrangell were not listed as eligible to form a village or urban corporation under ANCSA, and therefore, were not issued localized land holdings and titles through this process. However, residents of these communities were permitted to become “at-large” stakeholders in the Southeast Alaska regional corporation – SEALASKA (Dombrowski 2002, Gorsuch et al. 1994). Other Alaskan communities were also unlisted but were included in ANCSA provisions that outlined under what criteria they could become eligible at a later date. Neither ANCSA legislation nor subsequent congressional reports provided an explanation as to why these five Southeast Alaska communities were deemed ineligible for listing or why they were not listed under the provisions that applied to other ineligible communities (Gorsuch et al. 1994). The Village of Tenakee, Village of Haines, and KIC all attempted to appeal their unlisted status, but the Secretary of the Interior determined that Congress did not intend to allow unlisted Southeast Alaska communities to become eligible by proving their status as a Native village (Gorsuch et al. 1994).

The 1970s were also marked by extensive commercial harvesting and subsequent salmon and herring declines (Beier et al. 2009, Dombrowski 2002, Heard 2012, Thornton et al. 2010). Additionally, the combination of conservation concerns, the expenses of logging in a relatively remote location, and a drop in global pulp prices gradually slowed logging activity throughout the 1970s and 1980s. During the development of ANILCA in the late 1970s, residents of Ketchikan and Prince of Wales expressed extreme concern that the creation of wilderness areas and other Federal land designations would ultimately result in the loss of timber jobs (Inclusion of Alaska Lands in National Park, Forest, Wildlife Refuge, and Wild and Scenic River Systems, 1977).

The 1990 Tongass Timber Reform Act suspended the contracts of the two main logging companies in the region, further slowing logging activity (Dombrowski 2002). The Ketchikan Pulp Mill closed in 1997, resulting in significant economic impacts for many Ketchikan residents and a decline in the city’s population (Fall et al. 2013, Lynch 2019). The cruise tourism industry began growing in Ketchikan in the early 1980s and is now one of the key industries in the area (Ketchikan Gateway Borough 2010a). However, many of the jobs available in the tourism industry are lower paying, seasonal positions that have not fully made up for losses in income and employment previously available through timber and fishing industries (SERAC 2023).

Today, the Ketchikan Gateway Borough covers a total land area of just under 5,000 square miles, though the city itself accounts for only about 5 square miles of this total. The Tongass Narrows separate the city from Gravina Island, where the Ketchikan International Airport is Located. Ketchikan City is the oldest city still in existence in Alaska. As of 2022, the Ketchikan Indian Community (KIC) represented over 6,400 members, of which approximately half lived in the Ketchikan Gateway Borough (SERAC 2022a).

Ketchikan Area Population and Nonrural Boundary Issues

The nonrural Ketchikan Area finalized by the Board in 1992 included, and continues to include, the Census Designated Places (CDPs) of Clover Pass, North Tongass Highway, Ketchikan East, Mountain Pass/Point, Herring Cove, and Saxman East. However, these Ketchikan Gateway Borough CDPs were all dissolved prior to the 1990 census. This means that since 1990, the definition of the Ketchikan Area has been based in part on CDPs that no longer exist. The dissolution of these CDPs also means that census data collected since 1990 only provides specific population estimates for Ketchikan City, Saxman, and the very small CDP of Loring that was established in 2000. All remaining communities and areas of the Ketchikan Gateway Borough have since been combined into a single population category labeled “Balance” (see **Table 1**). As a result, it is not possible to determine from census data whether certain neighborhoods have expanded more than others, or how many residents of the Ketchikan Gateway Borough currently reside beyond the nonrural Ketchikan Area boundary. Therefore, since 1990, the best approximation for the population of the Ketchikan Area has been that of Ketchikan City plus the “Balance” category listed in **Table 1**.

Using this rough approximation, there were an estimated 13,459 people living in the Ketchikan Area in 1990 (**Table 1**). This figure represented about 19.5% of the total population of Southeast Alaska at the time (see **Table 2**). In comparison, about 39% of the region’s population lived in the City and Borough of Juneau, 12.5% lived in the City and Borough of Sitka, 6% lived on POW, 2% lived in Metlakatla, and less than 1% lived in Saxman (**Table 2**). These trends have remained similar since 1990, though the relative population of both Ketchikan and Sitka has decreased in relation to the rest of Southeast Alaska (see **Table 2**). In contrast, the relative population of Juneau has continued to grow over time, and the relative population of POW communities has been more variable (**Table 2**). There were an estimated 13,406 people living in the Ketchikan Area in 2022 (**Table 1**). This figure represented about 19% of the population of Southeast Alaska at the time (**Table 2**).

Between 2000 and 2010, the population of the Ketchikan Area decreased by about 4% (590 people), likely due to the combined effects of the 1997 Ketchikan Pulp Company mill closure and early 2000s fishing industry declines (Ketchikan Gateway Borough 2010b). However, the population rebounded between 2011 and 2020, increasing by 3.5% (471 people) over this period (**Table 1**). As a result, the current population of the Ketchikan Area is only about 2% (305 people) smaller than it was at its 2000 peak. Other communities in the region have shown more persistent and more extreme population declines. For example, the population of POW has declined by approximately 24% (1,018 people) since its population peaked in 1990, and the population of Sitka has declined by about 6% (531 people) since its peak in 2010 (**Table 1**). In contrast, the population of Juneau has increased by roughly 20% (5,451 people) since 1990 (**Table 1**). The population of Metlakatla has also recently increased by about 5% (69 people), after declining in the 1990s (**Table 1**). **Table 1** shows more detailed information on population change over time in these Southeast Alaskan communities and in other Alaskan communities.

Table 1. Estimated population of communities by census area. Note that census area boundaries, names, and included communities have changed over time (U.S. Department of Commerce 1981, ADLWD 2024, 2021, 2011, 2000). The rural status communities of Bethel, Kodiak City, and Kodiak Island Borough are included at the end of table because they are listed in the proposal as rural areas comparable to Ketchikan. The non-rural status communities of Fairbanks and Anchorage are presented to compare Ketchikan to other non-rural areas outside of the southeast region. Data for the state of Alaska is presented to contextualize population change in individual communities compared to the state as a whole.

Community or Area	1980	1990	2000	2010	2020	2022
<i>Southeast</i>						
Ketchikan Gateway Borough	11,316	13,828	14,067	13,477	13,948	13,762
Ketchikan Area Approximation	11,043	13,459	13,636	13,066	13,564	13,406
Ketchikan City	7,198	8,263	8,345	8,050	8,192	7,998
Saxman	273	369	431	411	384	356
Clover Pass	451	-	-	-	-	-
Herring Cove	99	-	-	-	-	-
Mountain Point	396	-	-	-	-	-
Pennock Island	90	-	-	-	-	-
Ketchikan East	387	-	-	-	-	-
North Tongass Highway	1,722	-	-	-	-	-
Saxman East	411	-	-	-	-	-
Loring CDP	-	-	4	4	0	0
Balance		5,196	5,287	5,012	5,372	5,408
Metlakatla ^a	1,056	1,407	1,375	1,405	1,454	1,444
Prince of Wales Island communities ^a	1,861	4,180	3,907	3,389	3,135	3,162
Craig	527	1,260	1,397	1,201	1,036	992
Hydaburg	298	384	382	376	380	347
Kasaan	25	54	39	49	30	49
Klawock	318	722	854	755	720	694
Edna Bay CDP	-	86	49	42	25	42
Hollis	-	111	139	112	65	139
Coffman Cove	193	186	199	176	127	201
Point Baker	90	39	35	15	12	10
Port Protection	-	62	63	48	36	33
Thorne Bay	320	569	557	471	476	449
Whale Pass	90	75	58	31	86	84
Naukatli Bay	-	93	135	113	142	131
Long Island CDP	-	198	-	-	-	-
Dora Bay CDP	-	57	-	-	-	-
Labouchere Bay CDP	-	149	-	-	-	-
Polk Inlet	-	135	-	-	-	-

Community or Area	1980	1990	2000	2010	2020	2022
Sitka City and Borough	7,803	8,588	8,835	8,881	8,458	8,350
Juneau City and Borough	19,528	26,751	30,711	31,275	32,255	32,202
Southeast Alaska Total	53,794	68,989	73,082	71,664	72,286	72,218
<i>Other Alaskan communities</i>						
Bethel	3,576	4,674	5,471	6,080	6,325	6,154
Kodiak City	4,756	6,365	6,334	6,130	5,581	5,396
Kodiak Island Borough	9,939	13,309	13,913	13,592	13,101	12,832
Fairbanks North Star Borough	53,983	77,720	82,840	97,581	95,655	96,816
Anchorage Municipality / Matanuska – Susitna Borough	192,247	266,021	319,605	380,821	398,828	402,767
State of Alaska total	401,851	550,043	626,932	710,231	733,391	736,508

^a Metlakatla and Prince of Wales Island communities are both included in the broader Prince of Wales-Hyder Census Area but are presented separately here for the sake of more direct comparison. The estimated number of residents living in unnamed areas of the Prince of Wales – Hyder Census Area is not included here as it is unclear in which localities these residents reside.

Table 2. Communities/Areas of Comparison as a Percentage of the Southeast Alaska Total Population. (The Ketchikan Area is approximated by the Ketchikan Gateway Borough, excluding Saxman. Prince of Wales Island communities include only those listed in Table 1).

Community or Area	1980	1990	2000	2010	2020	2022
Ketchikan Area	20.5%	19.5%	18.7%	18.2%	18.8%	19.0%
Saxman	0.5%	0.5%	0.6%	0.6%	0.5%	0.5%
Metlakatla ^a	2.0%	2.0%	1.9%	2.0%	2.0%	2.0%
Prince of Wales Island communities	3.5%	6.1%	5.3%	4.7%	4.3%	4.4%
Sitka City and Borough	14.5%	12.4%	12.1%	12.4%	11.7%	11.6%
Juneau City and Borough	36.3%	38.8%	42.0%	43.6%	44.6%	44.6%

Comparing the population density and other key demographic and socioeconomic factors of Ketchikan to nearby Southeastern rural status communities is complicated by the boundary issues associated with the current definition of the Ketchikan Area, as well as the vast differences between the geographical extent of Ketchikan City and that of the broader Ketchikan Gateway Borough (see Table 3). In general, the nonrural southeast communities listed in Table 3 tend to exhibit higher median household incomes than the rural communities. The nonrural communities also generally exhibit a lower percentage of Alaskan Native residents and a somewhat lower percentage of residents aged 65 and older (Table 3). However, Sitka and Kodiak break some of these trends, exhibiting both higher, or fairly equal, median household incomes and lower percentages of Alaskan Native residents than Ketchikan.

On average, nonrural communities tend to exhibit somewhat higher population densities than the rural communities listed in Table 3. However, there is significant variability in the population densities

exhibited both among and between nonrural and rural communities (Table 3). Significantly, the Ketchikan Gateway Borough exhibits one of the lowest population densities in Table 3, while Ketchikan City exhibits the highest population density. This points to the historical development of Ketchikan along a narrow strip near the waterfront. The vast majority of residences and commercial development in the Ketchikan Gateway Borough are located in Ketchikan City and the immediate surrounding areas.

Table 3. Population Demographics for Ketchikan and Comparison Communities with most recent American Community Survey Five-Year Averages for Age, Race/Ethnicity, and Household Income Information (ADCCED 2024). *The Alaskan communities of Bethel, Kodiak City, and Kodiak Island Borough are included at the end of table because they are listed in the proposal as rural areas of comparison to Ketchikan.

Status	Community or Area	Demographics				Economics	Population Density	
		2022 Population	% <20	% >65	% Alaska Native or American Indian		Median Household Income	Land Area (mi ²)
<u>Southeast</u>								
Nonrural	Ketchikan Gateway Borough	13,762	23.3	15.6	14.6	\$82,763	4898.9	3
	Ketchikan Area Approximation	13,406	-	-	-	-	38.0	353
	Ketchikan City	7,998	23.9	13.6	17.4	\$68,125	3.4	2352
	Juneau City and Borough	32,202	23.1	13.9	9.4	\$90,126	2716.7	12
Average		16,842	23.4	14	13.8	\$80,338	1,914	680
Rural	Klawock	694	23.9	19.3	36.2	\$53,750	0.6	1157
	Craig	992	22.9	15.1	17.1	\$61,875	6.7	148
	Saxman	356	19.9	23.8	73.7	\$46,250	1.0	356
	Sitka City and Borough	8,350	22.5	14.8	9.4	\$82,083	2874.0	3
Average		2,598	22.3	18.3	34.1	\$60,990	720.6	416
		2022 Population	% <20	% >65	% Alaska Native or American Indian	Median Household Income	Land Area (mi ²)	Density (people/mi ²)
<u>Other</u>								
Rural	Bethel	6,154	33.0	6.5	67.8	\$100,852	43.8	141
	Kodiak City	5,396	23.2	13.7	4.1	\$76,765	3.5	1542
	Kodiak Island Borough	12,832	26.9	10.9	11.4	\$91,138	6559.8	2
Average		8,127	28	10	28	\$89,585	2,202	561

Testimonies on the Rural Character of Ketchikan

A valuable assessment of the rural or nonrural status of Ketchikan comes from public testimonies. During Council meetings and public hearings, many people provided testimonies, explaining the reasons for their

support or opposition to the proposal. In addition to having opinions voiced on record, these testimonies also describe what it is like to live in Ketchikan and nearby rural communities. Analysis of these testimonies uncovered three key themes regarding the rural character of Ketchikan and its relation to other southeastern communities: (1) The economic vulnerability of Ketchikan and its services; (2) The importance of traditional foods/subsistence resources to the maintenance of culture and identity in the area; and (3) the degree to which rural communities in the southeast rely on natural resources for their livelihoods.

Regarding the first theme, testifiers focused on recent disturbances to the food supply chain, such as those experienced after 9/11 and during the COVID pandemic, to highlight Ketchikan's remote nature and the vulnerability of its economy to stresses from the outside. As one KIC member explained at a public hearing in Ketchikan, "We are a community that is not connected to the major road system, and due to its island nature, [Ketchikan is] isolated. If ferries or planes stop [coming], we have no way in or out, and impacts on food resources become an immediate problem" (OSM 2023a). Furthermore, during these times of stress, residents of Ketchikan have demonstrated that they rely on subsistence resources to meet their basic needs. The individual quoted above explained further:

We rely more heavily on nature's products than the state of Alaska wants to acknowledge. A review of the [2005] KIC subsistence survey indicates a much different picture than the official story [ADF&G's previous wild foods harvest estimate for Ketchikan]. So, your judgment may be based on biased, outdated, or arbitrary data. We still have to survive on what we can here. If something happened to us to where we were shut off, like 9/11 when they couldn't bring in the foods, we still have to subsist on what we have here and we can and we always will (OSM 2023a).

Another KIC member noted that Ketchikan has community members who are particularly vulnerable to these disturbances in the food supply chain, such as elders and those living below the poverty line. He explained that improved access to subsistence resources would help people in these circumstances make ends meet:

As I already mentioned, the pandemic clearly showed how vulnerable our community is due to supply chain issues, and especially the more vulnerable members of the population. Folks that are really just doing their best to get by. By allowing our community more access to subsistence hunting and fishing, it will increase the likelihood that there would be a reduction of burden on government programs or even preventing somebody from having to go into a government program to feed themselves or their family (OSM 2023a).

These statements are supported through past research and testimony that demonstrated that for many Ketchikan Area residents, harvest of fish and wildlife is also an important supplement to wage-earning jobs, particularly in light of recent declines in the commercial economy of the area (FSB 2006, Garza et al. 2006, SERAC 2022a). One resident summarized this issue, explaining:

I paint for a living, and I do sheetrock. I was a longshoreman at one time, but that's no longer happening. I used to work right on the dock here where this beautiful building is. I used to load logs. I used to work at the pulp mill and go back and forth, but that's no longer happening. So, to subsidize, we have to either go in the woods and gather in the spring or go in the woods and gather during the winter to put something on the table (FSB 2006: 53).

The second key theme on the rural character of Ketchikan expressed by testifiers was the importance of subsistence resources to meet traditional and cultural needs. KIC members and other testifiers elaborated on the cultural meanings and identities that are embedded in subsistence/traditional foods practices – particularly the harvesting, consuming, and sharing of traditional resources. Several KIC members explained that subsistence was critical for maintaining their cultural identities and traditions of their Tribe. One KIC member explained that “our culture is driven by the way we prepare our foods, the way we catch our foods...and the way we consume them” (SERAC 2019a: 63). Another noted:

I can tell you that access to our traditional foods, particularly deer and salmon, are very important to our Tribe and the community as a whole. Not only because of our own remote location, being disconnected from the road system and having to rely on our goods being brought in here by barge, but it's also an important connection to maintaining our traditional ways and our traditional lifestyle (OSM 2023a).

Likewise, other KIC members stressed the importance of passing down traditional subsistence practices to their children. One man explained that these practices have been passed down through the generations in Ketchikan, and that this transmission of knowledge is very meaningful in the way that it builds and maintains cultural identity:

My uncles taught me how to subsistence fish and I'm teaching my children how to subsistence fish and harvest their foods. And the best thing about harvesting those [resources] is teaching my own children. Because I don't make them do it. They want to do it. They see me working on the fish that they eat, that they love. And that is the best thing as a father, as an indigenous person, or non-indigenous, is seeing your young ones wanting to learn and harvest their own subsistence (OSM 2023a).

In the same public hearing in Ketchikan, the KIC President, Norm Skan, also described his family's reliance on natural resources and the need to teach subsistence practices to his children. However, he noted that existing regulations have made it difficult for him pass on these cultural traditions:

We rely heavily on the seafood, whether it's fish or seaweed. And as far as being able to hand down our culture so far here in Ketchikan, I've only recently been able to teach my kids first, and now my grandkids, how to process fish. And that's wrong on so many levels. And we just need to get our rural status back so that we're able to live indigenously as we were created to be, and the indigenous people have been stewards of this land, sea, and air since time immemorial (OSM 2023a).

Similarly, as DiNovelli-Lang (2010: 155) explained in her research on Alaskan subsistence politics:

For a community to lose its rural status under ANILCA is not just to lose the privilege (as some may see it) for its citizens to take more fish and game than another community; it is to lose standing with respect to a fleet of rights, tied to Native land claims and identified with tradition, that flow through subsistence protections. It is to lose the wedge to innumerable claims to land, to species and to what is called cultural survival.

In addition to teaching youth to harvest subsistence resources, many of those who testified focused on the importance of sharing resources with others in their families and community. Resource redistribution, or sharing, has long been studied by anthropologists. Many anthropologists stress the importance of sharing for forming and maintaining important social networks that ultimately provide individuals with senses of identity and understandings of their roles within their families and communities. Dr. Forest Haven conducted ten years of first-hand research on traditional food practices and subsistence management policies in Southeast Alaska, noting in testimony during a public hearing that “sharing is not just economic redistribution, but fully ingrained in social being and relationships” (OSM 2024). Dr. Haven identifies as an Alaska Native who grew up in Metlakatla and testified in support of the proposal at the phone-conference public hearing. In her testimony, she provided her insight on the role of food sharing, particularly the sharing of traditional foods, in gaining cultural knowledge and developing important relationships. She explained:

It's not something we just do as an individual activity for ourselves. We do this for our clan, for our families, for our neighbors, and one of the biggest issues over all of the people that I've talked to, especially in urban areas, is the way the regulatory system kind of puts a halt to that process (OSM 2024).

In her statement, Dr. Haven explained that subsistence activities are learned and practiced in community with others, and through these communal activities indigenous people understand and enjoy their relationships with others. Of note, in her dissertation research (Haven 2022), Dr. Haven reported sharing subsistence resources with her family in Ketchikan. Several residents have likewise stated that their harvest is shared with elders in the community, used for cultural and community events, and that their children and grandchildren participate in harvesting traditional foods (FSB 2006; SERAC 2022a). Similarly, an elder KIC member who was born in Ketchikan in the 1960s described her own experiences with sharing resources with others in her community. As she explained, sharing salmon and other resources with family and neighbors was critical to her upbringing and continues to be heavily practiced:

The parents across the street there, I know that was Esther's parents. Every once in a while, her father would come across and give a deer or a seal to my family, to my grandmother's family. And that was not pre-planned. If they went out and got something, they shared, and this is how it always was at our family fish camp. Many families from many different backgrounds came to fish camp to stock up. And so, that's how we lived. And some people were better at getting fish, others were better at getting the berries or the teas or the seaweed, depending on if they had a boat. So, we all pitched in together to make sure everybody had what they needed, but this still happens today, and my neighbors are from Klawock. They knock on my door to share food with me, and I knock on their door to share food. We share food with them. So, this is still going on

today. And so, in some ways, it looks like the times have changed a lot. Then, in many ways, not so much (OSM 2024).

KIC members and other Native Southeast Alaskans have explained that “sharing is subsistence” (Haven 2022: 5, KIC 2024). Sharing is what builds and maintains social relationships, cultural identity, and entire ways of life in these communities (Haven 2022: 5, also DiNovelli-Lang 2010, KIC 2024). However, several KIC members and Ketchikan residents feel that regulations are impeding their ability to engage in traditional practices like resource sharing. Several who testified claimed that Federal recognition of the rural status of Ketchikan would help to reduce restrictions that people here face in harvesting local, traditional foods. One KIC member noted:

Right now, we are, being a non-subsistence community, we have to go farther to go out to areas where we can hunt, fish, and gather. We have limited seasons and that's additional cost or safety considerations that come into play if we have to travel greater distances or have to take multiple trips because they have a smaller harvest limit. Those are things that we're looking to probably open up so we can have greater access to the resources that the tribal members and community depend upon (OSM 2023b).

This KIC member continued, explaining that Federal subsistence priority would improve opportunities to harvest ooligan [Eulachon] from the Unuk River, which he identified as part of the traditional harvesting area for KIC members.

The third key theme captured during testimonies was the importance of natural resources and subsistence practices as a basis for livelihood in rural communities. This theme was commonly expressed by members of rural communities, particularly those of POW, as they described the main differences they perceive between their lived experiences and those of the residents of Ketchikan. They agreed that residents of Ketchikan, particularly KIC members, depend on natural resources to maintain their cultural identities and traditions. However, residents of POW believed that defining rural characteristics included: limited economic opportunities, high costs of living, and high dependency on natural resources for household sustenance and aspects of their local economies (OSM 2023b). At the public hearing in Klawock, one man explained that Ketchikan had more services and economic opportunities than communities on POW. He said:

When you're talking about the difference between rural and nonrural, Ketchikan has enough dock space to go ahead and have three or six large cruise ships dock up at any given day of the week. They have industry where they have a large shipyard area – one of the largest shipyards here in the Southeast. They have the University, they have a Coast Guard base, they also have State offices, including the Marine Highway System. I mean, I don't understand how you can go ahead and classify Ketchikan as a rural area with all that kind of infrastructure embedded in. Again, it's not to say that they don't deserve to go ahead and go hunting or go ahead and fish in order to go ahead and get their subsistence...in fact I really stand behind all the natives and trying to go ahead and get their subsistence, or I'm sorry, get their native foods and the traditional foods. Yet, it's not as rural as being out here on this island (OSM 2023b).

Likewise, the Mayor of Craig shared his views on the economic differences between Ketchikan and POW, noting that residents of POW must pay much more for their limited services. He explained:

Looking at the idea of taking a community like Ketchikan, we pay twice as much in freight...our food prices are double. We can't go to Alaska Airlines, and it costs us almost twice as much to get off of Prince of Wales to go you know to Ketchikan, and a lot of resources we just don't have over here. So, with that being said, the idea of Ketchikan becoming a rural community would totally take out any definition that I could find today as rural (OSM 2023b).

Rather than describing POW as having a vulnerable economy, residents explained that POW often lacks good opportunities to earn cash incomes. One man from POW testified that his family spends much of their time, energy, and money on harvesting and processing subsistence resources as a means of meeting their basic needs. He stated,

There's not a lot of economic stimulus here. What we do on the island is we do as well as we can for ourselves. So, when you're talking about subsistence, my family needs it and uses it. In fact, my son right now has a seal hanging up outside the house that's he skinned this afternoon. He went on after seal. I cut up the bait today so we can go ahead, and go get a halibut. Myself, my two sons who are adults, my in-laws, we all have SHARC [Subsistence Halibut Registration Certificate – Administered by NOAA] cards. We use the federal subsistence in order to go ahead and get it. We go ahead every year actually. I think it's about every quarter, whenever we can to go ahead and get steelhead permits, so that we can go ahead and get steelhead fish. It's necessary, it's the specific foods for the natives. It's a matter of just feeding my family – in order to go ahead and get fish, in order to go ahead and get meat, in order to go ahead and get vegetables...this is how we survive (OSM 2023b).

To him and others on POW, a rural community lacks many options beyond a subsistence way of life. There are limited opportunities on POW for one to earn enough money to be able to buy all their foods from the expensive grocery stores on the island. Residents of these types of communities are constantly engaged in subsistence practices because they would not otherwise be able to feed themselves and their families. However, while many Ketchikan residents noted that subsistence/traditional food harvesting had great cultural importance, resource harvesting was primarily used to buffer economic shortages rather than as the main livelihood option.

Use of Wild Resources in the Ketchikan Area

The use of wild resources is an important characteristic of rural areas in Alaska and was identified by the Southeast Council as a key consideration for determining the Ketchikan Area's rural or nonrural status (SERAC 2023). Sources of information on the harvest and use of wild resources by residents of the Ketchikan Area include a single comprehensive subsistence survey conducted by KIC according to ADF&G research protocols in 2005, ADF&G sport and personal use harvest data, ethnographic data, a survey and structured interviews conducted by KIC in 2023, and information provided by the public at Southeast Council meetings, Federal Subsistence Board meetings, and public hearings on this proposal.

It should be emphasized that Ketchikan has been located in a Federal Nonrural Area and a State Nonsubsistence Use Area for over thirty years. As a result, Ketchikan residents have generally not had the same hunting and fishing opportunities as other nearby communities and areas in Southeast Alaska. During this time, Ketchikan Area residents have been ineligible for subsistence hunting and fishing under Federal regulations in any area. Additionally, there are no State subsistence hunting or fishing opportunities in the immediate vicinity of Ketchikan. For opportunity under State regulations, Ketchikan residents must travel beyond the Nonsubsistence Use Area, or they can utilize State sport or personal use fishing and hunting opportunities closer to home. Ketchikan residents have repeatedly testified at Southeast Council meetings and Federal Subsistence Board meetings that they face challenges in harvesting fish and wildlife because this regulatory situation requires them to travel far from home to access harvest areas, and/or abide by lower harvest limits (FSB 2006, SERAC 2019b, 2022b). Furthermore, these constraints make it difficult to share their subsistence harvests with family and friends in a traditional, community enriching manner (KIC 2024, Haven 2022).

Similarly, there has also been less research specifically conducted on Ketchikan Area residents' harvest and use of fish and wildlife. ADF&G Division of Subsistence has never conducted a comprehensive subsistence survey for Ketchikan, though it did conduct more specialized surveys on marine mammal harvest and use between 1995 and 2008. This context is important for interpreting the following discussion and comparison of the use of fish and wildlife by Ketchikan Area residents and the rural residents of nearby communities like Klawock, Craig, Saxman, and Sitka. Bethel and Kodiak are also included for comparison because they were mentioned in the proposal as communities of comparable size that already have rural status within the Federal Subsistence Management Program.

Harvest Patterns and Harvest Areas

Public testimony has long documented that harvest of fish and wildlife is for many Ketchikan Area residents a key aspect of their cultural identity (FSB 2006; SERAC 2019a, 2022b, 2023; OSM 2023a, 2023b, 2024). As explained in the Testimonies on the Rural Character of Ketchikan, the harvest and use of natural resources is critical to residents of Ketchikan both for sustenance and for maintaining traditional social networks and cultural identities. Ketchikan residents have further testified that they participate in subsistence harvesting each year, going “from Eulachons, to herring eggs, to seaweeds, to greens, to fish, to berries, to elderberries, Hudson Bay tea, deer, seal...we go through the whole season just like everybody else. Those resources are out there and we’re resourceful people, we’re going to go out and use them, whether we’ve lived here one year or twenty years” (FSB 2006: 44). For many Ketchikan Area residents, harvest of fish and wildlife is also an important supplement to wage-earning jobs, particularly in light of recent declines in the commercial economy of the area (FSB 2006, SERAC 2022a).

Information compiled from harvest survey data and public testimonies indicate that Ketchikan Area residents harvest and use a variety of fisheries, wildlife, and plant resources. These resources are summarized in **Table 4** below. Places currently or historically used by Ketchikan Area residents to harvest these resources include the Unuk River, Stikine River, Bostwick Inlet and other areas on Gravina Island, Yes Bay, POW, Ward Cove, Boca de Quadra Bay, coastal and road-accessible areas of Revillagigedo Island, and the marine waters near Ketchikan (FSB 2006, USDA 2004, SERAC 2019a, 2019b, 2020,

2021a, 2022b). A Ketchikan resident explained that the Bostwick Inlet “offers good hunting for deer, bear, and other wildlife. Its surrounding marine environment offers shellfish, halibut, seal, beach asparagus, goose tongue, seaweed, and many other marine based plants and animals. Most of the activities are only half an hour away or less by boat. This has been a customary and traditional use area for countless generations and will be depended on for at least the next seven generations to provide for all these needs” (USDA 2004: B-8). The communities of Ketchikan, Saxman, and Metlakatla continue to place a high value on the Bostwick drainage and marine area as it is integral to their well-being (USDA 2004).

Table 4. Summary of Documented Fisheries, Wildlife, and Plant Resources Harvested and Used by Ketchikan Area residents (Garza et al. 2006; SERAC 2019a).

	Fisheries Resources	Wildlife Resources	Plant Resources
1.	Salmon	Deer	Beach Asparagus
2.	Halibut	Moose	Black Seaweed
3.	Hooligan (Eulachon)	Caribou	Blueberries
4.	Red Snapper	Black Bear	Salmonberries
5.	Other Rockfish	Mountain Goat	Huckleberries
6.	Lingcod	Elk	Elderberries
7.	Trout	Birds and Bird Eggs	Goose Tongue
8.	Dolly Varden		Hudson Bay Tea
9.	Marine Mammals		
10.	Butter Clams		
11.	Dungeness Crab		
12.	Shrimp		
13.	Abalone		
14.	Sea Cucumber		
15.	Herring & Herring Eggs		

KIC partnered with the Bureau of Indian Affairs and the University of Alaska Marine Advisory Program to conduct a comprehensive subsistence survey of Ketchikan in 2005. The study area for this survey was defined as the same “area described by the Federal Subsistence Management Program as the Ketchikan Nonrural Area” (Garza et al. 2006: 1). It included all of the road-connected zone except for Saxman. The survey area also included Mountain Point, Herring Cove, Ward Cove, Clover Pass, and Gravina and Pennock Islands (Garza et al. 2006). Due to the relatively large population of this area, investigators surveyed a random sample of approximately 5% (242 surveys) of all Ketchikan’s permanent, year-round resident households (Garza et al. 2006).

Survey results estimated that Ketchikan households harvested an average of 231 pounds of wild foods during the 2005 study year. The estimated average per person harvest of wild foods by Ketchikan residents was 91 pounds (Garza et al. 2006; see **Table 5**). This figure was substantially higher than ADF&G’s estimate of 33 pounds of wild foods harvested per Ketchikan resident in 2000 (Garza et al. 2006), but lower than that estimated for other nearby rural status communities (**Table 5**). Notably, ADF&G estimates of subsistence harvest for communities located in Nonsubsistence Use Areas appears to be based only on harvest taken under State subsistence permits, and it does not include harvest taken under personal use fisheries, sport fishing, or sport hunting regulations (Fall 2018). **Table 5** compares Ketchikan's estimated average harvest of wild resources produced by Garza et al. (2006) with those of

other select communities in Southeast Alaska for which a subsistence survey has been conducted. **Table 5** also includes a comparison with larger rural status communities of Kodiak and Bethel that were mentioned in the original proposal. For communities where multiple subsistence surveys have been conducted, the survey year closest to 2005 was chosen for comparison.

Despite exhibiting a large overall community harvest, Ketchikan exhibited the lowest average harvest of wild foods per household and per person of the communities shown in **Table 5**. Ketchikan’s average harvest of wild foods per household was approximately half that of Sitka, a community of relatively comparable size. However, at least some of this discrepancy is likely related to Ketchikan’s long-term status as a Nonrural community located in a Nonsubsistence Use Area with relatively less fishing and hunting opportunity than places like Sitka. There was no way to separate the harvests of KIC members from those of other Ketchikan Area residents using the data presented in this report (see Garza et al. 2006). Likewise, there is no way to separate the harvest of residents of Ketchikan City from the rest of the Ketchikan Gateway Borough.

Table 5. Average harvest of wild foods in Ketchikan, Klawock, Craig, Saxman, Sitka, Bethel, Kodiak City, and Kodiak Road Zone (Garza et al. 2006, ADF&G CSIS 2024). *The Alaskan communities of Bethel, Kodiak City, and Kodiak Island Borough are included at the end of table because they are listed in the proposal as rural areas of comparison to Ketchikan.

Community	Survey Year	Community Population	Average harvest of wild foods per household (lbs.)	Average harvest of wild foods per person (lbs.)	Total Harvest of wild foods per community (lbs.)
<i>Southeast</i>					
Ketchikan	2005	13,125	231	91	1,194,375
Klawock	1997	847	895	320	271,040
Craig	1997	1,764	670	231	407,484
Saxman	1999	380	545	217	82,460
Sitka	2013	7,873	465	175	1,377,775
<i>Other</i>					
Bethel	2012	5,673	572	166	941,718
Kodiak City	1993	6,058	459	151	914,758
Kodiak Road Zone	1991	4,002	580	168	672,336

In this 2005 survey, investigators noted that Ketchikan households used an average of approximately nine different wild resources (Garza et al. 2006). In comparison, Sitka households used an average of about 12 different resources in 2013 (Sill and Koster 2017). Unfortunately, similar information is not available for Saxman, Klawock, or Craig in their comparison study years. Fish made up the largest percentage of Ketchikan’s harvest in 2005, accounting for about 67% of all wild foods harvested in pounds edible weight. Salmon was the primary fish species harvested, followed by halibut. The remainder of Ketchikan’s harvest consisted of approximately 15% land mammals (primarily deer), 10% marine

invertebrates (primarily Dungeness crab and shrimp), 7% vegetation (berries, beach asparagus, and seaweeds), 1% marine mammals, and less than 1% birds and eggs (Garza et al. 2006).

Chinook Salmon was the most heavily harvested species by Ketchikan Area residents in 2005, followed by Coho and Sockeye salmon. However, it is likely that other species of salmon have overtaken Chinook in terms of bulk harvest in Ketchikan since this time, as the Chinook Salmon fishery has changed substantially in recent years (Limle 2024, pers. comm.). In the 2005 Ketchikan survey, all salmon species combined to provide about 38 pounds of food per person. The primary harvest method used by Ketchikan residents was rod and reel, potentially reflecting the dominance of sport fishing opportunity in the Ketchikan Area (Garza et al. 2006). Other gear used included drift gillnets, set nets, and beach seines (Garza et al. 2006). Public testimony indicates that Ketchikan residents will use beach seines and gillnets to harvest salmon in State personal use fisheries (SERAC 2019a).

Halibut were the most important non-salmon fish species harvested by Ketchikan residents in 2005, contributing roughly 15 pounds of food per person (Garza et al. 2006). KIC members have been permitted to harvest halibut under the North Pacific Fishery Management Council subsistence halibut fishery since 2003. Other residents of the Ketchikan Area are limited to harvesting halibut under State sport fishing regulations. However, since the waters immediately surrounding Revillagigedo are considered nonsubsistence use areas, KIC members participating in the subsistence halibut fishery must travel further into marine waters to participate in the subsistence halibut fishery (KIC 2024, OSM 2023a, SERAC 2023). KIC members and other Ketchikan residents have testified that it is both costly and risky to travel into deeper marine waters to harvest halibut, especially on smaller boats (FSB 2006, SERAC 2019b). However, halibut does not fall under the authority of the Federal Subsistence Management program.

Other non-salmon fish harvested by Ketchikan Area residents during the 2005 study year included: Red Snapper (Yelloweye Rockfish) and other rockfish, Lingcod, Rainbow and steelhead trout, Cutthroat Trout, Eulachon, and Dolly Varden (Garza et al. 2006). However, these species combined to contribute less than one pound of food per person during the study year (Garza et al. 2006). The researchers noted that Eulachon runs had declined significantly in the three years prior to the survey, and this was the reason for lower harvests in the Ketchikan Area (Garza et al. 2006). Public testimony has emphasized the cultural importance of the Unuk River and Unuk River Eulachon in the Ketchikan area. Eulachon is described by Ketchikan residents as a traditional food, and residents have noted that long-standing closures to Non-federally Qualified Users (NFQUs) are causing them to lose connection to this culturally important resource (FSB 2006, SERAC 2020, 2021a, 2022b). One resident explained the importance of the Unuk River, stating “when we speak of the Unuk River and we speak of the last river, those are migration trails that we came out of. Those are survival trails that we came out of...The Sanya Kwaan came out of that Unuk River. When you go up in the Unuk River you’ll see the petroglyphs at minus tide. It tells our history of who we are and where we came from” (SERAC 2013: 280). Similarly, the Unuk River area has also been an important area for harvesting Chinook Salmon, seal, and moose for many years (SERAC 2022a).

Public testimony also documents that Ketchikan Area residents harvest herring roe, with Ward Cove historically being an important herring roe harvest site (SERAC 2019b). In recent years, KIC has led

efforts to distribute herring roe harvest throughout the community, sharing herring eggs with an estimated 400 to 500 households in 2020 (SERAC 2020, KIC 2024).

Ketchikan Area residents also harvested and used shellfish during the 2005 survey year (Garza et al. 2006). Shrimp were the most important type of shellfish harvested, contributing about 4 pounds of food per person (Garza et al. 2006). Dungeness crab provided an additional 3 pounds of food per person, with smaller amounts of butter clams and red sea cucumber also harvested (Garza et al. 2006). There is notable evidence through public testimony that clams, sea cucumber, seaweed, and beach asparagus are particularly important for Ketchikan Area residents (SERAC 2013, 2019a, 2019b, 2021a). KIC has previously sought customary and traditional use findings from the State for beach foods, stating that commercial harvest of these foods poses risks to Ketchikan residents' ability to harvest these foods in the future (SERAC 2022a). Many of these foods have been important resources throughout people's lives (SERAC 2019a, 2022b).

Today, however, harvest of shellfish and other beach foods is constrained by the risk of Paralytic Shellfish Poisoning (PSP) and pollution of the intertidal zone (SERAC 2018a, 2019a, 2019b). Many residents attribute this pollution to cruise ships that dump their sewage and wastewater in nearby waters (SERAC 2018a, 2019a, 2019b). Residents note that State aquatic resource permit requirements and harvest limits have also restricted their ability to harvest sufficient amounts of seaweed (SERAC 2019a).

Large land mammals contributed an estimated 15% of Ketchikan Area residents' harvests by weight, and an estimated 38% of households used large land mammals in 2005. In terms of pounds harvested, deer were by far the most important large land mammal, providing about 10.5 pounds of meat per person. Moose, caribou, black bear, and goat provided smaller amounts of food (Garza et al. 2006). During the survey year, Ketchikan residents also reported harvesting and using plant species such as blueberries, huckleberries, and salmonberries.

Another way to quantitatively assess the significance of different resources to a community is to consider the percentage of households using each species, as well as the degree to which fish and wildlife species are shared within and between communities. **Table 6** shows the estimated rates of use, attempted harvest, and harvest of wild resources by residents of Ketchikan and comparison communities. Halibut was the species used by the greatest percentage of Ketchikan households, followed by Chinook Salmon, Coho Salmon, Dungeness crab, blueberries, salmonberries, shrimp, deer, huckleberries, and Sockeye Salmon (Garza et al. 2006). A substantial percentage of Ketchikan residents used, attempted to harvest, and harvested fish and wildlife resources in 2005. Yet, on average, Ketchikan residents' rates of participation in these activities were somewhat lower than those documented for the other seven comparison communities (**Table 6**). Ketchikan residents also received resources from others at lower rates than residents of all other comparison communities, and they gave resources at lower rates than all but one of the comparison communities (see **Table 7**). However, as KIC's (2024: 37) recent survey indicates, "a diversity of foods are harvested, put up, and distributed in Ketchikan – this appears to be more established within the Native community, which employs institutionalized forms of sharing and distribution."

Table 6. The percentage of households using, attempting to harvest, and harvesting wild resources in Ketchikan, Klawock, Craig, Saxman, Sitka, Bethel, Kodiak City, and Kodiak Road Zone (Garza et al. 2006, ADF&G CSIS 2024). *The Alaskan communities of Bethel, Kodiak City, and Kodiak Island Borough are included at the end of table because they are listed in the proposal as rural areas of comparison to Ketchikan.

Community	Survey Year	Percentage of Households Using Wild Resources	Percentage of Households Attempting to Harvest Wild Resources	Percentage of Households Harvesting Wild Resources
<i>Southeast</i>				
Ketchikan	2005	80%	72%	66%
Klawock	1997	100%	93%	91%
Craig	1997	99%	91%	90%
Saxman	1999	97%	81%	79%
Sitka	2013	99%	91%	91%
<i>Other</i>				
Bethel	2012	97%	86%	85%
Kodiak City	1993	99%	90%	88%
Kodiak Road Zone	1991	96%	97%	96%

Table 7. The percentage of households giving and receiving wild resources for Ketchikan, Saxman, Sitka, Craig, and Klawock (Garza et al. 2006, ADF&G CSIS 2024). *The Alaskan communities of Bethel, Kodiak City, and Kodiak Island Borough are included at the end of table because they are listed in the proposal as rural areas of comparison to Ketchikan.

Community	Survey Year	Percentage of Households Giving Wild Resources	Percentage of Households Receiving Wild Resources
<i>Southeast</i>			
Ketchikan	2005	35%	61%
Klawock	1997	77%	94%
Craig	1997	16%	91%
Saxman	1999	70%	92%
Sitka	2013	76%	92%
<i>Other</i>			
Bethel	2012	70%	92%
Kodiak City	1993	84%	97%
Kodiak Road Zone	1991	78%	92%

The authors of the 2005 Ketchikan subsistence study acknowledge that there is no way of knowing whether 2005 represents a typical year’s harvest for Ketchikan Area residents, as it is the only comprehensive study of the area. However, the crash of the Unuk River Eulachon stock was noted as a key factor impacting local harvests during the study period (Garza et al. 2006). More recently, the Unuk River area has been threatened by mining activities (SERAC 2022a). As one KIC member explained,

“What we call the sacred headwaters, where our creation stories come from, where our migration stories are...the mining industry calls it the golden triangle. Eighty percent of the Unuk is staked for mining” (SERAC 2022a: 376).

Similarly, the Bostwick Inlet Area was included in the proposed Gravina Island timber sale project in the early 2000s. Proposed timber sales in the Tongass National Forest (South Revilla project) and on Alaska Mental Health Trust lands have also been viewed as potential threats to local harvest opportunities in the Ketchikan Area. Discussions at Southeast Council meetings have specifically noted that logging these lands may reduce winter habitat for deer and increase access to hunting areas, thereby potentially leading to deer population declines and increasing hunting competition (SERAC 2020). A large portion of the original South Revilla timber project area was subsequently transferred to the Alaska Mental Health Trust and heavily logged, with expected impacts on high value winter deer range (Limle 2024, pers. comm.). However, this land is no longer federally managed (Limle 2024, pers. comm.).

In summary, ethnographic data, household survey data, and public testimony shows that harvest of wild foods is key to many Ketchikan residents’ cultural identity and can provide an important supplement to limited cash income. The 2005 Ketchikan household harvest survey demonstrates that the use of wild resources, including sharing them with other community members, is widespread. However, quantitative rates of harvest and sharing appear to be less than those exhibited by nearby rural communities. Still, Ketchikan residents have noted that harvest levels here are lower than those in designated rural communities because there are fewer opportunities to hunt and fish by subsistence regulations in Ketchikan compared to many other communities in Southeast Alaska.

Other Fish and Wildlife Harvest Data

Sport Fishing

Current sport fishing opportunities open to Ketchikan Area residents are listed in **Table 8** below. Data on freshwater and marine sport fishing harvests are available only through mail surveys conducted annually by ADF&G Sport Fish Division. These surveys are used to assess sport fishing harvest in specific survey areas by all anglers. Survey results for the Ketchikan sport fish survey area include all fish reported harvested within the survey area by any sport fisher, regardless of community of residence. Therefore, it is not possible to distinguish how much of this harvest was taken by Ketchikan residents and how much was taken by residents of other communities. Although the data are of limited value for definitively understanding Ketchikan residents’ harvest patterns, they can still provide a general picture of the types and amounts of fish harvested under sport regulations in the marine and fresh waters surrounding Ketchikan (see **Table 9**).

Table 8. Key sport fishing opportunities open in the Ketchikan Area, as of 2024 (5 AAC 47.020, 5 AAC 47.021, 5 AAC 47.022, 5 AAC 47.0223).

Species	Harvest Limits
Chinook Salmon: fresh water	Closed
Chinook Salmon: salt water	28 inches or longer: established by Emergency Order Less than 28 inches: retention prohibited
Coho Salmon (16 inches or longer)	6 per day, 12 in possession. Along Ketchikan road system, Ketchikan Creek, Ketchikan Lake, opened portions of Herring Cove creek, and Ward Creek drainage: limited to 2 per day, 2 in possession (in combination) Some portions of Behm Canal closed to sport fishing for salmon; other portions open only from August 15 – April 30
Chum, Pink, and Sockeye (including Kokanee) (16 inches or longer)	6 of each species per day, 12 of each species in possession. Along Ketchikan road system, Ketchikan Creek, Ketchikan Lake, opened portions of Herring Cove creek, and Ward Creek drainage: limited to 2 per day, 2 in possession (in combination). Some portions of Behm Canal closed to sport fishing for salmon; other portions open only from August 15 – April 30
Coho, Chum, Pink, and Sockeye (including Kokanee) (in combination) (less than 16 inches)	10 per day, 10 in possession
Steelhead	36 inches or longer: 1 per day, 2 in possession, 2 fish annual limit
Cutthroat and Rainbow Trout (in combination)	11-inch minimum and 22-inch maximum size: 2 per day, 2 in possession
Dolly Varden, Brook Trout, and Arctic Grayling	No size limit: 10 per day, 10 in possession
Sablefish (Black Cod): salt water	No size limit: 4 per day, 4 in possession

From 2013 to 2022, Coho Salmon were the most-harvested species according to sport fish surveys collected for the Ketchikan survey area, with an average harvest of about 44,332 Coho harvested per year (**Table 9**). Pink Salmon were the second most harvested species at about 29,943 per year, followed by rockfish, Pacific halibut, and Chinook Salmon (**Table 9**). As with other Alaskan communities, Ketchikan Area residents have testified about the cultural importance of Chinook Salmon and the impacts of declining Chinook size and abundance (FSB 2006, SERAC 2019a, 2019b, 2021a). One Ketchikan resident noted that the tourism industry influences Chinook harvest opportunities, stating that “the Chinook Salmon fishery was closed down for a period of time and then it just so happens to open up when the first cruise ship, you know, lands in Ketchikan. That’s quite upsetting (SERAC 2019a: 61).

Table 9. Freshwater and marine sport fish harvest in the Ketchikan survey area from 2013 to 2022, according to annual mail surveys. (The fishing reported here is by anglers from any community, fishing within the Ketchikan survey area. Only the five most harvested species are included) (ADF&G 2023).

Year	Sea-run Coho salmon	Pink salmon	Rockfish	Pacific Halibut	Sea-run Chinook salmon
2013	67,991	36,084	17,232	18,664	11,039
2014	53,471	21,659	23,573	14,295	13,878
2015	46,262	26,763	20,786	15,930	10,197
2016	35,704	35,712	18,264	12,777	5,740
2017	49,166	21,927	13,070	11,614	6,384
2018	27,082	19,353	21,486	14,296	6,446
2019	35,221	36,951	16,439	12,602	4,722
2020	20,514	19,629	5,381	10,570	3,485
2021	57,209	36,076	11,940	15,917	3,534
2022	50,695	45,277	12,378	17,438	4,431
Total	443,315	299,431	160,549	144,103	69,856
Average	44,332	29,943	16,055	14,410	6,986
Standard Deviation	14,526	9,155	5,458	2,590	3,532

Personal Use and Subsistence Salmon Fishing

Residents of Ketchikan and Saxman are the primary participants in State personal use salmon fisheries in the Ketchikan Area (Brown et al. 2023). They are also some of the primary participants in State subsistence salmon fisheries located beyond the Ketchikan Nonsubsistence Use Area (Brown et al. 2023). However, personal use fishing is not permitted in streams located along the Ketchikan road system. Only sport fishing regulations apply in these roadside areas. This generally results in lower harvest limits and a reduced number of legal harvest methods in these areas. However, some Ketchikan residents have noted that they lack the means to access harvest areas other than these roadside streams, and therefore, fish primarily under sport regulations (SERAC 2019a, 2020). Furthermore, specific harvest data for personal use and subsistence fisheries utilized by Ketchikan residents are only available in combination, through annual reports issued by ADF&G Division of Subsistence (see **Table 10**).

Between 2011 and 2020, Ketchikan residents were issued an average of 240 personal use and subsistence salmon permits per year (**Table 10**). During this time, Ketchikan residents fishing in personal use and subsistence fisheries primarily harvested Sockeye Salmon, followed by Pink Salmon, and Chum Salmon (**Table 10**). Overall, Ketchikan residents harvested an average of approximately 3,004 salmon per year in these subsistence and personal use fisheries over this ten-year period (**Table 10**).

Table 10. Estimated salmon harvested by residents of Ketchikan in State personal use and subsistence fisheries between 2011 and 2020 (Fall et al. 2019, Fall et al. 2020, Brown et al. 2023, Brown et al. 2022, Brown et al. 2021; ADLWD 2012, 2013, 2015, 2016a, 2016b, 2017, 2018, 2019, 2020, 2022).

Year	Sockeye Salmon	Pink Salmon	Chum Salmon	Coho Salmon	Chinook Salmon	Total Salmon	Permits Issued	Salmon harvest per resident of Ketchikan
2011	2,286	244	277	22	20	2,849	281	0.22
2012	2,863	297	309	53	5	3,526	265	0.26
2013	2,255	556	307	160	10	3,288	253	0.24
2014	3,222	256	258	190	38	3,965	279	0.29
2015	3,580	385	388	40	13	4,407	256	0.33
2016	2,437	904	615	159	41	4,155	277	0.31
2017	1,929	185	264	18	20	2,416	204	0.18
2018	813	230	372	96	18	1,529	247	0.11
2019	1,532	351	126	21	104	2,135	193	0.16
2020	1,012	663	104	28	16	1,824	141	0.13
Total	21,929	4,071	3,020	787	285	30,042	2,396	-
Average	2,193	407	302	79	29	3,004	240	0.22
Standard Deviation	901	231	143	67	29	1014	46	0.08

Ketchikan residents' per person salmon harvests can be compared with that of other nearby communities during the same period (see **Table 11**). However, differences in opportunity and availability likely affect these comparisons. Still, Klawock exhibited the greatest average per person salmon harvests in personal use and subsistence fisheries from 2011 to 2020, while Ketchikan exhibited the lowest per person salmon harvests in these fisheries during this time (**Table 11**). Ketchikan residents per person harvests were most similar to those of Juneau residents (**Table 11**). However, both Ketchikan and Juneau are located in Nonsubsistence Use Areas, and therefore have less access to subsistence fisheries. Sport fishing opportunities likely take on greater importance for residents of Ketchikan considering the restrictions on personal-use fishing along the Ketchikan road system, and the absence of nearby subsistence fisheries.

Table 11. Per person salmon subsistence and personal use harvest by six communities from 2011 to 2020, in the Southeast region (Fall et al. 2019, Fall et al. 2020, Brown et al. 2021, Brown et al. 2022, Brown et al. 2023; ADLWD 2012, 2013, 2015, 2016a, 2016b, 2017, 2018, 2019, 2020, 2022).

Community	Subsistence and personal use salmon harvest per resident
Ketchikan	0.22
Klawock	3.93
Craig	0.91
Saxman	1.38
Sitka	1.30

Community	Subsistence and personal use salmon harvest per resident
Juneau	0.26

Wildlife Harvest Reports

Deer were the most important land mammal harvested by residents of the Ketchikan Area during the 2005 comprehensive survey (Garza et al. 2006), and deer continue to compose the bulk of Ketchikan Area residents' land mammal harvests. More recent ADF&G harvest reports indicate that an average of about 1,247 Ketchikan resident hunters harvested an average of 1,186 deer per year in Southeast Alaska between 2013 and 2022 (Schumacher 2024, pers. comm.). This equated to an average harvest of just under 1 deer per Ketchikan hunter and 0.09 deer per Ketchikan resident during this ten-year period (Schumacher 2024, pers. comm.). These figures are most similar to those reported for Juneau (see **Table 12**). **Table 12** compares Ketchikan residents' deer harvests from 2013 to 2022 with those of the comparison communities of Klawock, Craig, Sitka, and Juneau. It should be noted that Saxman is not included in this comparison table because "deer hunters reported the section of Ketchikan known as Saxman as their community of residence in only 6 of 10 years. It is likely that more people who lived in Saxman hunted deer in all years but reported Ketchikan as their community of residence" (Schumacher 2024, pers. comm.). As with previous discussions of fisheries harvests, this comparison of deer harvests between communities should be considered with respect to differences in opportunity, availability, and local preferences for deer in each community.

Table 12. Average number of deer hunters, total deer harvested, deer harvested per hunter, and deer harvested per resident of Ketchikan, Klawock, Craig, Sitka, and Juneau from 2013 to 2022 (Schumacher 2024, pers. comm., ADLWD 2015, 2016a, 2016b, 2017, 2018, 2019, 2020, 2022).

Community	Average Hunters	Average Harvest	Average Deer Harvested per Hunter	Average Deer Harvested per Resident
Ketchikan	1,247	1,186	0.95	0.09
Klawock	218	348	1.60	0.45
Craig	355	549	1.54	0.50
Sitka	1,110	2,382	2.15	0.27
Juneau	2,036	2,007	0.99	0.06

From 2013 to 2022, the vast majority of Ketchikan residents' deer hunting and harvest occurred near home in Unit 1A (45% of harvests), or in nearby Unit 2 (52% of harvests) (Schumacher 2024, pers. comm.). During discussions on the proposed South Revilla timber sale, it was noted that residents of Ketchikan, Saxman, and Metlakatla rely heavily on Wildlife Analysis Areas 405, 406, and 407 for deer hunting within Unit 1A (SERAC 2020). Ketchikan residents also reported harvesting a small percentage of their deer in Unit 3 (1% of harvests) and Unit 4 (2% of harvests) from 2013 to 2022 (Schumacher 2024, pers. comm.). A handful of Ketchikan hunters also sought deer in Units 1B and 1C during this time (Schumacher 2024, pers. comm.). These harvest patterns are somewhat similar to the comparison communities included in this analysis, in that Ketchikan residents tended to focus their deer hunting efforts relatively close to home. Saxman residents reported harvesting about 38% of their deer from Unit

1A and 62% from Unit 2 (Schumacher 2024, pers. comm.). Residents of Klawock and Craig reported harvesting 99% of their deer in their home unit – Unit 2 (Schumacher 2024, pers. comm.). Sitka residents reported harvesting about 99% of their deer from Unit 4, while Juneau residents reported harvesting about 84% of their deer from Unit 4, and 13% from Unit 1C (Schumacher 2024, pers. comm.).

Public testimony at Southeast Council and Federal Subsistence Board meetings documents that Ketchikan residents have historically harvested much of their deer from Unit 2 (POW) (FSB 2006; SERAC 2019a). Residents have explained that the more extensive road system on POW facilitates more efficient hunting for Ketchikan residents, who have far fewer miles of paved road to provide hunting access in Unit 1 (SERAC 2022a). As one Ketchikan resident explained, “several years ago [the amount of road in the Ketchikan area] was cut down to 300 miles that they said they can maintain... but it’s barely passible. They’re not maintained. They’re not graded. But, if you go over to POW, I think there’s a thousand or two-thousand miles of road, a lot that’s paved. In Ketchikan, you really have just 30-some miles of paved road [that is well maintained]” (SERAC 2019a: 43).

However, Ketchikan residents appear to be doing less deer hunting in Unit 2 (POW) in recent years, possibly due in part to the early season closure and harvest limit reductions that were adopted for NFQUs here in 2018 (SERAC 2021a). Deer hunting has also increased substantially on Gravina Island in recent years, while the construction of a new road to Shelter Cove has also enabled greater hunting in the Ketchikan Area (Limle 2024, pers. comm.). On average, Ketchikan residents reported harvesting about 70% of their deer in Unit 2 from 2013 through 2017 (Schumacher 2024, pers. comm.). However, Ketchikan residents reported harvesting an average of 29% of their deer in Unit 2 from 2018 through 2022 (Schumacher 2024, pers. comm.). One Ketchikan resident explained that because of the recent harvest restrictions placed on NFQUs in Unit 2, “A lot of families I know, including my family, skipped their annual hunting trip to POW because of the lower limits for deer. It just isn’t cost efficient anymore” (SERAC 2019b: 218). Still, KIC members have noted that it is not their intention to come to POW to harvest key subsistence resources like deer if Ketchikan were to be granted rural status (KIC 2024; SERAC 2023). KIC members have explained that they want to attain rural status in order to conduct subsistence harvesting activities more efficiently in their home area (SERAC 2023).

Ketchikan residents harvested smaller amounts of black bear, mountain goats, moose, and elk between 2013 and 2022 (Churchwell 2024, pers. comm.). During this ten-year period, Ketchikan residents harvested an average of 31 black bears, 18 mountain goats, 5 moose, and 1 elk per year in Southeast Alaska (Churchwell 2024, pers. comm.). On a per person basis, Ketchikan’s harvest of black bears was less than that of Craig and Klawock, but more than that of Juneau, Sitka, and Saxman (Churchwell 2024, pers. comm.). Ketchikan’s per person harvest of mountain goats was less than that of Sitka, but more than that of Craig, Juneau, Klawock, and Saxman (Churchwell 2024, pers. comm.). However, it should be noted, that some of Saxman residents’ black bear and mountain goat harvests could have been categorized as being harvested by residents of Ketchikan (Churchwell 2024, pers. comm.), similar to the situation with deer.

In sum, Ketchikan residents harvest notable levels of fish and wildlife under State regulations, focusing largely on salmon and deer in areas close to the community. Ketchikan residents’ harvest levels are lower

than most other Southeast communities and are more similar to those of Juneau. However, as stated above, Ketchikan residents cannot harvest under Federal Subsistence regulations and are located in a State Nonsubsistence Use Area.

Economic Indicators and Employment

Income and Cost of Living

The Southeast Council was also interested to understand more about the recent economic conditions and potential economic changes in Ketchikan as a key factor in considering the Area's rural or nonrural status (SERAC 2023). Between 2018-2022 the median household income in the Ketchikan Gateway Borough was \$82,763 (US Census Bureau 2023a). Residents of Ketchikan earned less than residents of Juneau or Sitka, but more than residents of the Prince of Wales-Hyder Census Area (**Table 13**). At the community level, income levels were more variable. For instance, average median household income from 2018-2022 was \$73,512 in Ketchikan City, \$66,146 in Craig, \$60,625 in Klawock, and \$50,500 in Saxman City (**Table 13**). Per capita income may be a more reliable estimate of income across communities because it includes wages from multiple jobs as well as income from investments, transfer payments, and self-employment (Bell 2014). When considering average annual per capita income from 2018-2022, Ketchikan and Sitka were much more similar (\$44,368 and \$43,964, respectively). Juneau residents exhibited the highest per capita income (\$49,207), while residents of the Prince of Wales – Hyder census area had the lowest per capita income (\$34,433) (**Table 13**). Historical data shows that per capita income levels have varied over time in these communities. Ketchikan and Sitka had similar per capita income levels in the early 1980s. In the late 1980s, however, per capita income in Ketchikan increased, becoming similar to that of Juneau. This pattern continued until around 2010, at which point per capita income in Sitka increased and became more similar to that of Juneau and Ketchikan. Per capita income in the Prince of Wales – Hyder area has consistently been much lower than in Ketchikan, Sitka, or Juneau (US Bureau of Economic Analysis 2022).

Similarly, poverty levels have consistently been highest in the Prince of Wales – Hyder area (**Figure 3**). Poverty levels have generally been lowest in Juneau, followed by Sitka, and the Ketchikan Gateway Borough (**Figure 3**). From 2018-2022, an average of 8.6% of the Ketchikan Gateway Borough's population was considered to be experiencing poverty, compared to 7.9% of Sitka's population, 7.9% of Juneau's population, and 14.6% of the Prince of Wales-Hyder census area population (**Table 13**). Yet, while Ketchikan and Juneau both experienced higher poverty rates in 2021, presumably due to the impacts of the COVID-19 pandemic, this increase was especially notable in Ketchikan (**Figure 3**). Within the Ketchikan Gateway Borough, poverty levels are typically higher in Saxman than in Ketchikan City (**Table 13**).

Table 13. Economic indicators for select borough, census areas, and communities in Southeast Alaska. Some metrics are not available for communities with a population less than 5,000 people. Poverty estimates are based on the American Community Survey for cities and based on the Small Area Income and Poverty Estimates program for boroughs. (US Census Bureau 2023a).

Community or Area	Median household income (in 2022 dollars), 2018-2022	Per capita income in past 12 months (in 2022 dollars), 2018-2022	Persons in poverty (%)	Median value of owner-occupied housing units, 2018-2022	Median Rent Price, 2018-2022
Ketchikan Gateway Borough	\$82,763	\$44,368	8.6	\$361,000	\$1,275
Ketchikan City	\$73,512	\$41,057	12.9	\$304,300	\$1,214
Saxman City	\$50,500	-	17.7	-	\$1,069
Juneau City and Borough	\$95,711	\$49,207	7.9	\$404,600	\$1,464
Sitka City and Borough	\$95,261	\$43,964	7.9	\$424,700	\$1,309
Prince of Wales-Hyder Census Area	\$61,779	\$34,433	14.6	\$220,800	\$883
Craig	\$66,146	-	12.2	-	\$1,010
Klawock	\$60,625	-	17.8	-	\$865

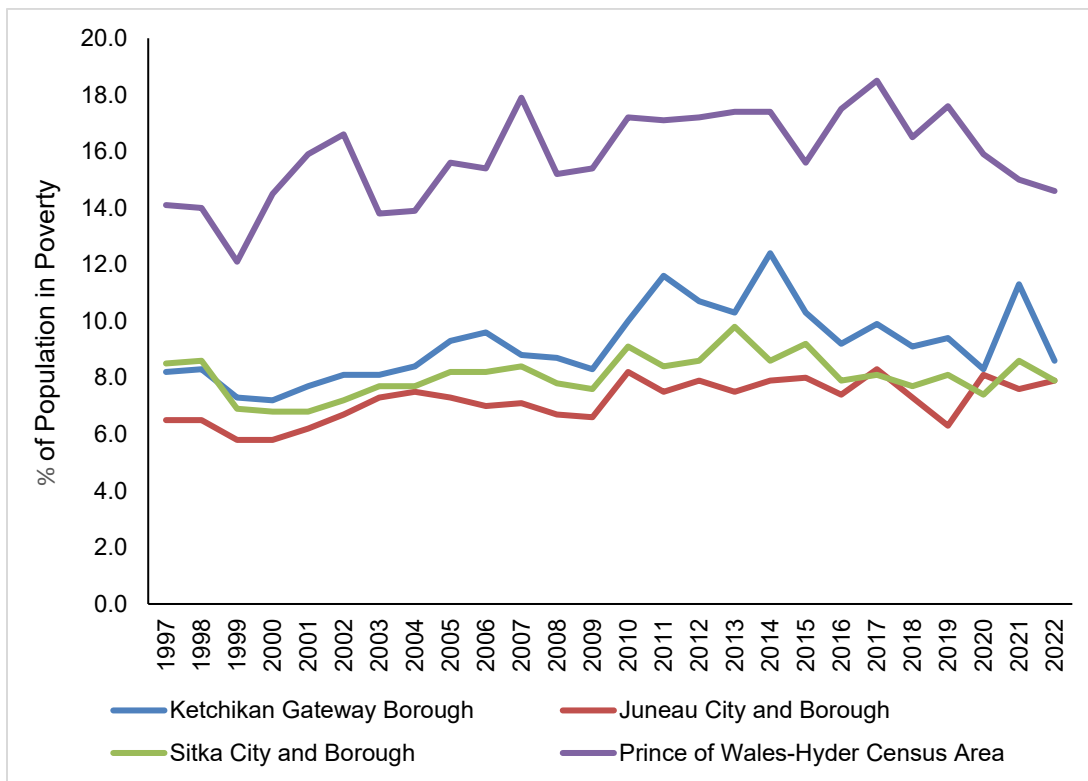


Figure 3. Estimated percent of people experiencing poverty in four Southeast Alaskan communities/areas (US Census Bureau 2023b).

Indicators suggest that the cost of living in Ketchikan is somewhat lower than in nearby rural communities in Southeast Alaska. Cost of living (COL) is difficult to assess across different areas of Alaska due to the limitations in available data. For instance, data on average fuel prices may be available for areas with larger populations, such as Anchorage or Juneau, but are often unavailable for smaller communities. Available data indicates that housing costs are highest in Sitka, followed by Juneau, Ketchikan, and the Prince of Wales – Hyder census area (**Table 13**). However, housing costs are only one component of COL. All communities across Southeast Alaska rely on importing necessary goods such as groceries and fuel. These goods are primarily imported via barge, often from Seattle. Historically, year-round exporting of timber products helped keep freight costs down. Seasonal export of seafood provides some similar benefits, though not to the same extent (City of Wrangell 2021). Barge expenses vary widely across community but are generally lowest in Ketchikan due to their proximity to Seattle (City of Wrangell 2021). In December 2021, it cost \$139.05 to transport a 500-pound pallet of groceries from Seattle to Ketchikan via the Alaska Marine Line. These same goods cost \$147.21 to transport to Wrangell, \$155.42 to transport to Petersburg, \$171 to transport to Juneau, \$179.94 to transport to Craig, \$190.46 to transport to Haines, \$197.61 to transport to Sitka, \$202.23 to transport to Skagway, \$240.75 to transport to Hoonah, and \$302.63 to transport to Thorne Bay (City of Wrangell 2021). The lower costs in Ketchikan appear to be associated both with relative proximity to Seattle and location within the inside passage. Still, freight expenses are a major source of business costs in Southeast Alaska, and typically increase around 4.5% each year (City of Wrangell 2021).

Seasonality of Employment

Employment rates suggest that Ketchikan’s economy has become more dependent on seasonal positions over the last three decades and is highly vulnerable to outside disturbances. Seasonal employment opportunities in commercial fishing, seafood processing, and tourism have become more important in Ketchikan because of declines in the timber industry and government sectors (Bell 2014, Ketchikan Gateway Borough 2010b). Like other areas of Southeast Alaska, seasonal employment in Ketchikan peaks from July through September (**Figure 4**). Ketchikan’s monthly unemployment rates have generally been higher than those in Juneau and Sitka, but lower than the unemployment rates for the Prince of Wales – Hyder area (**Figure 4**). For most years from 1990 to 2009, the Ketchikan area had higher winter unemployment rates than Juneau or Sitka, but these three communities had similar unemployment rates during the summer months (**Figure 5**). This patterns suggests that Ketchikan residents were either more reliant on, or had greater seasonal employment opportunities than residents of other Southeast Alaska communities. However, since 2010, Ketchikan has experienced higher summer unemployment rates than Juneau or Sitka, suggesting that seasonal employment opportunities may be declining (**Figure 5**).

Employment in the Prince of Wales – Hyder Census Area is also highly seasonal, and this area consistently has much higher unemployment rates than Ketchikan, Juneau, or Sitka (**Figure 4**). The higher unemployment rates in this area may indicate fewer available jobs, less reliance on tourism, and/or greater reliance on positions not included in employment data, such as seafood harvesting and self-employment. One notable exception to this pattern occurred during the COVID-19 pandemic, in the spring and summer of 2020. While the communities of the Prince of Wales – Hyder census area maintained typical seasonal unemployment rates, the other three census areas experienced much higher-

than-normal unemployment rates (**Figure 5**). The Ketchikan Gateway Borough experienced the highest unemployment rate during this period, peaking at 15.4% in April 2020. Except for the 2020-year, overall unemployment rates across the region have generally been decreasing since 2010 (**Figure 5**). Declines in unemployment likely indicate recovery from the 2008 recession and/or a decrease in the number of people seeking employment as individuals age into retirement or move out of the area. Unemployment rates throughout the region have generally been in decline since they spiked in 2020, but the rates declined relatively quickly in Ketchikan, Sitka, and Juneau. Unemployment rates in these three communities are now lower than the unemployment rates witnessed on POW.

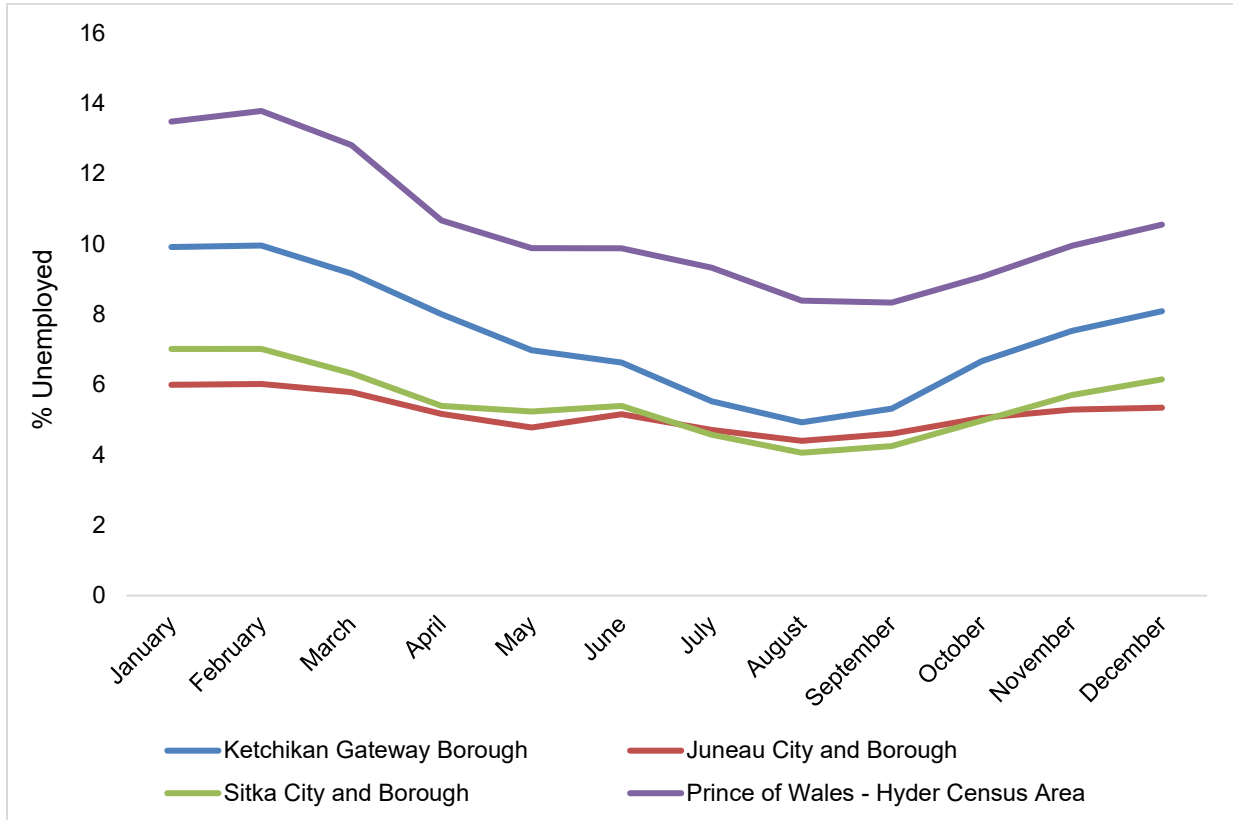


Figure 4. Average monthly unemployment rates from January 1990 – September 2023, except for Prince of Wales-Hyder census area, for which data is only available January 2010 – September 2023. (ADLWD 2023a).

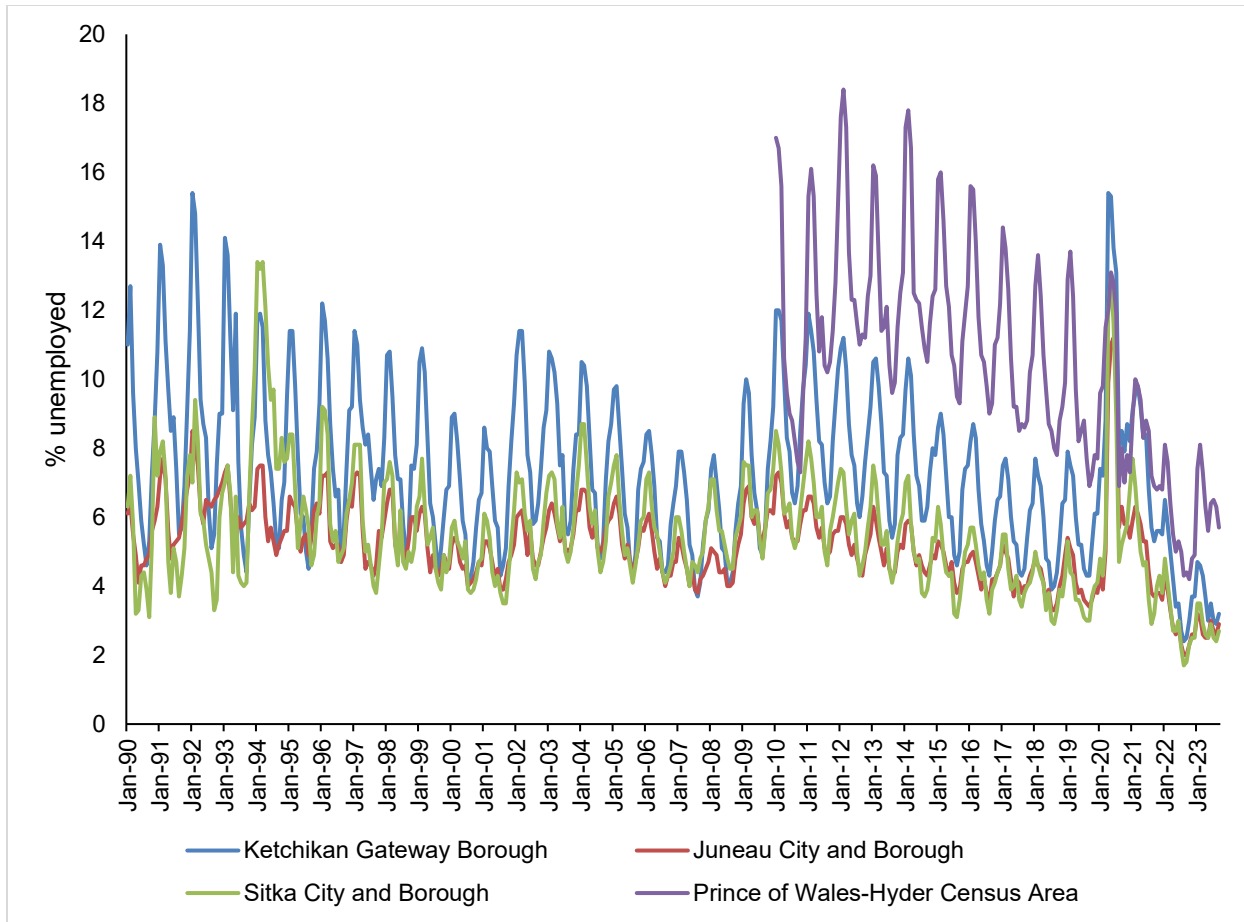


Figure 5. Historical unemployment rates by Southeast Alaskan Community (ADLWD 2023a).

*Prior to 2010, the Prince of Wales area was part of the Prince of Wales – Outer Ketchikan Census Area. Unemployment data are not provided online for this census area.

Commercial Fishing and Seafood Processing

Commercial fishing and seafood processing has long represented one of the largest private sector industries in Southeast Alaska, and Ketchikan has a major regional seafood port (Alaska Seafood Marketing Institute 2022). There are several seafood processing plants in the Ketchikan area, including E.C. Philips & Son, Alaska General Seafoods, and Trident Seafoods. Ketchikan has some advantages over other Southeast Alaskan communities in the seafood industry, including being closer to markets in the Continental United States and having good access to air and marine shipping services (Ketchikan Gateway Borough 2010b). However, the relative importance of the commercial fishing industry to Ketchikan’s overall economy has been in decline recently.

Ketchikan is the headquarters of the Southeastern Southeast Regional Aquaculture Association (SSRAA), which operates seven hatcheries and seven additional remote release sites throughout Southeast Alaska (SSRAA 2023). Three of the SSRAA sites are located in or near Ketchikan. The Deer Mountain Hatchery is in downtown Ketchikan, the Whitman Lake Hatchery is eight miles south of Ketchikan in Herring

Cove, and the Neets Bay Hatchery is located in the northern area of Revillagigedo Island, 30 air miles north of Ketchikan at the mouth of Neets Creek (SSRAA 2023). The Neets Bay location is where the majority of SSRAA smolts are released (SSRAA 2018), and this has direct benefits for commercial and sport fishing in and around Ketchikan.

Commercial and sport fishers in Ketchikan and POW, along with those of Petersburg and Wrangell, benefit most from the SSRAA hatcheries. From 2013-2017, annual commercial earnings attributable to SSRAA fish averaged \$16.8 million. Most of this money (60%, or an average of \$9.9 million each year) was earned by Alaskan residents. From 2013-2017, Ketchikan permit holders earned 29% (\$2,842,400) of the total amount earned by Alaskan residents. In comparison, resident permit holders on Prince of Wales Island earned about 25% (\$2,482,200) and resident permit holders in Juneau and Sitka earned 4% (\$369,500) and 2% (\$243,700) respectively (SSRAA 2018). Resident permit holders in Petersburg and Wrangell earned about 37% combined (\$3,682,300) (SSRAA 2018).

Sport fishers also benefit greatly from the hatcheries in and around Ketchikan. ADF&G creel surveys estimate that from 2013-2016, approximately 33% of the sport harvested Chinook Salmon and 13% of the sport harvested Coho Salmon taken from the Ketchikan area were SSRAA-produced. In contrast, only 2-5% of sport harvested Chinook and Coho salmon taken from the POW area were SSRAA-produced (SSRAA 2018). An analysis of SSRAA economic impacts notes that in the months of May and June, Ketchikan's charter fishing industry "is largely dependent on SSRAA Chinook returning to nearby release sites including Whitman Lake and Neets Bay" (SSRAA 2018: 2).

While residents of Ketchikan, POW, Petersburg, and Wrangell benefit from the presence of the SSRAA, hatcheries throughout the region provide benefits to other communities. For instance, the Northern Southeast Regional Aquaculture Association (NSRAA) operates three hatcheries on Baranof Island, while Douglas Island Pink and Chum, Inc (DIPAC) operates two hatcheries in the Juneau area (McDowell Group 2010). From 2001-2008, the NSRAA accounted for the greatest portion of commercial catch of hatchery fish in the Southeast region (48% of 326 million pounds) (McDowell Group 2010). Previous analyses found that, of the earnings from hatchery fish that go to Alaskan resident permit holders, residents of Sitka, Wrangell, and Petersburg are the primary beneficiaries of NSRAA hatcheries, while residents of Juneau, Haines, Wrangell, and Petersburg are the primary beneficiaries of DIPAC hatcheries (DIPAC 2009, NSRAA 2009).

Despite its relatively favorable positioning, available data suggests that the seafood industry is declining in Ketchikan more so than in other Southeast communities. Ketchikan's commercial seafood earnings have increased at a much lower rate (**Figure 6**), the number of resident permit holders has decreased to a greater extent and over a longer period (**Figure 7**), and the number of seafood processing jobs has decreased substantially (**Figure 8**). The number of seafood processing jobs has also decreased in the Prince of Wales – Hyder area, but these declines began earlier in Ketchikan and have been proportionally much greater (**Figure 8**). Sitka is markedly different from other communities in this analysis in that commercial seafood earnings and the number of seafood processing jobs have increased significantly while the decline in number of resident permit holders has been relatively smaller (**Figures 6-8**).

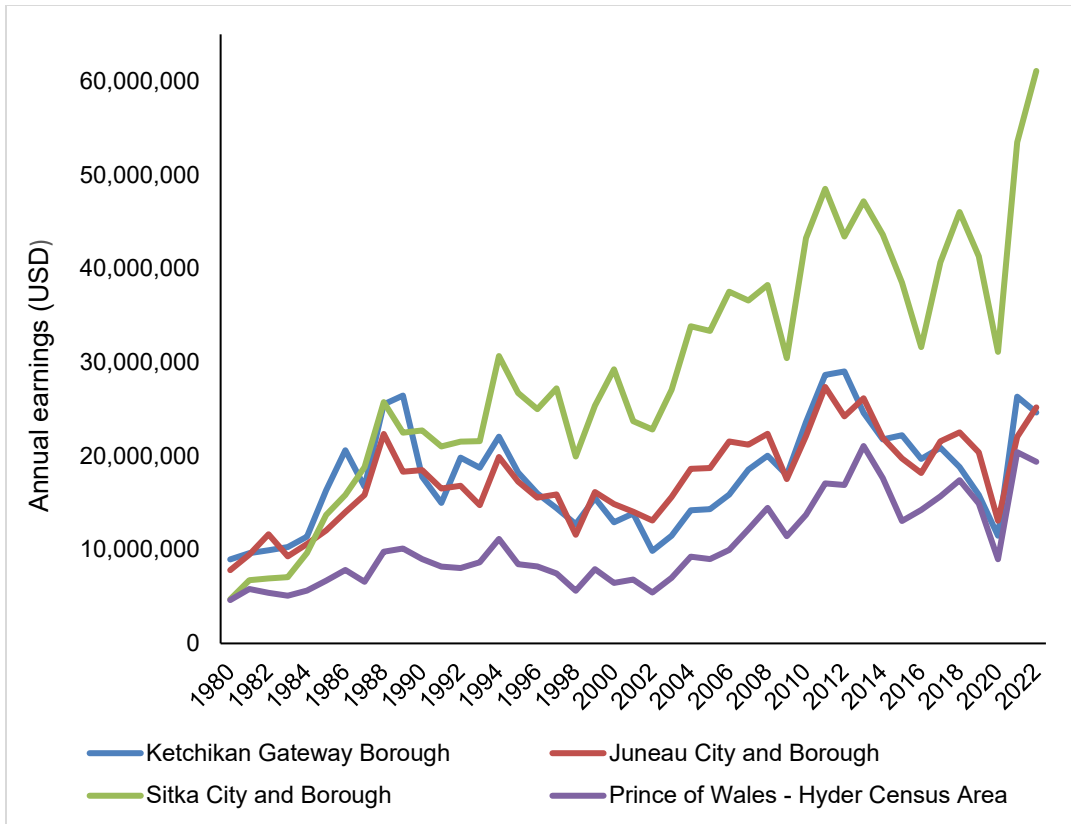


Figure 6. Annual estimated gross commercial earnings across all fisheries for resident permit holders (Alaska Commercial Fisheries Entry Commission 2024)

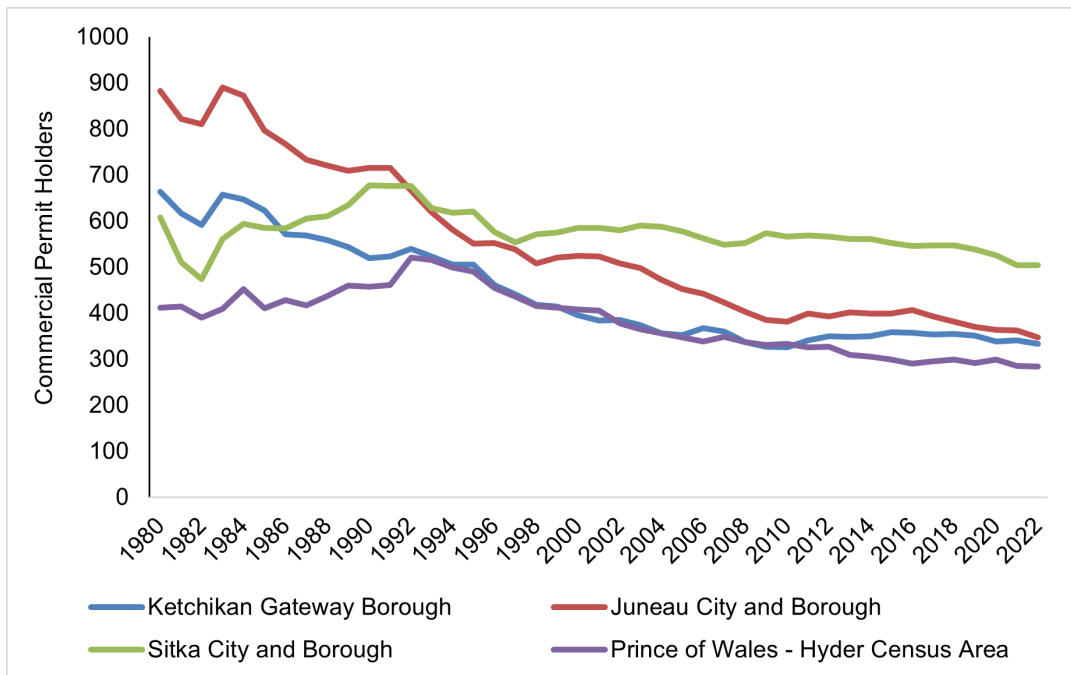


Figure 7. Changes in resident commercial permit holders over time. (Alaska Commercial Fisheries Entry Commission 2024).

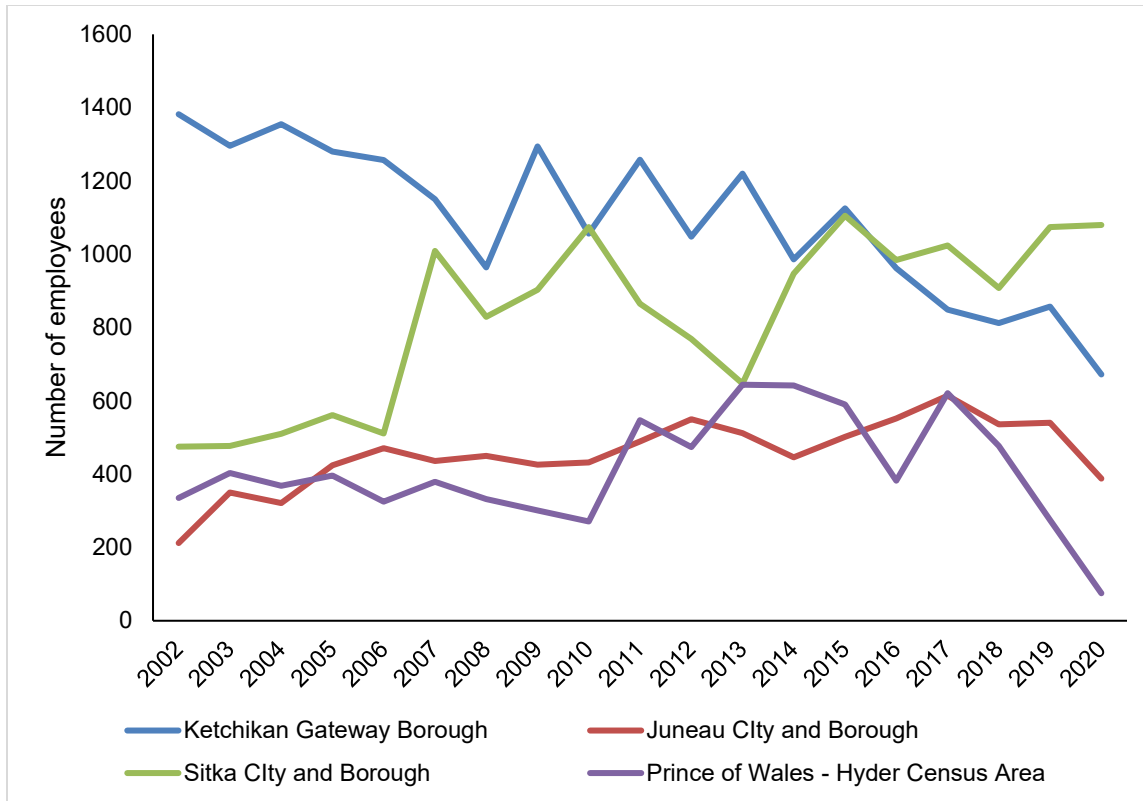


Figure 8. Changes in seafood processing employment over time in four Southeast Alaskan communities/areas (ADLWD 2023b).

The reduced growth in earnings, high decline in the number of local commercial fishermen, and significant loss of seafood processing jobs in Ketchikan is compounded by the fact that most seafood processing wages in Ketchikan are now earned by non-local workers, or those who do not have their primary residence in the Ketchikan Gateway Borough (**Figure 9**). Since 2002, non-local workers have consistently earned 60-68% of the annual seafood processing wages in the Ketchikan Gateway Borough, despite consistent declines in the number of seafood processing jobs (**Figure 9**). In the Juneau, Sitka, and POW communities, the percentage of seafood processing wages earned by non-local workers was historically much lower, but this has also increased dramatically over time (**Figure 9**). While in Sitka this increase corresponds to an increase in the total number of seafood processing jobs (**Figure 8**), this pattern is not present in POW or Juneau.

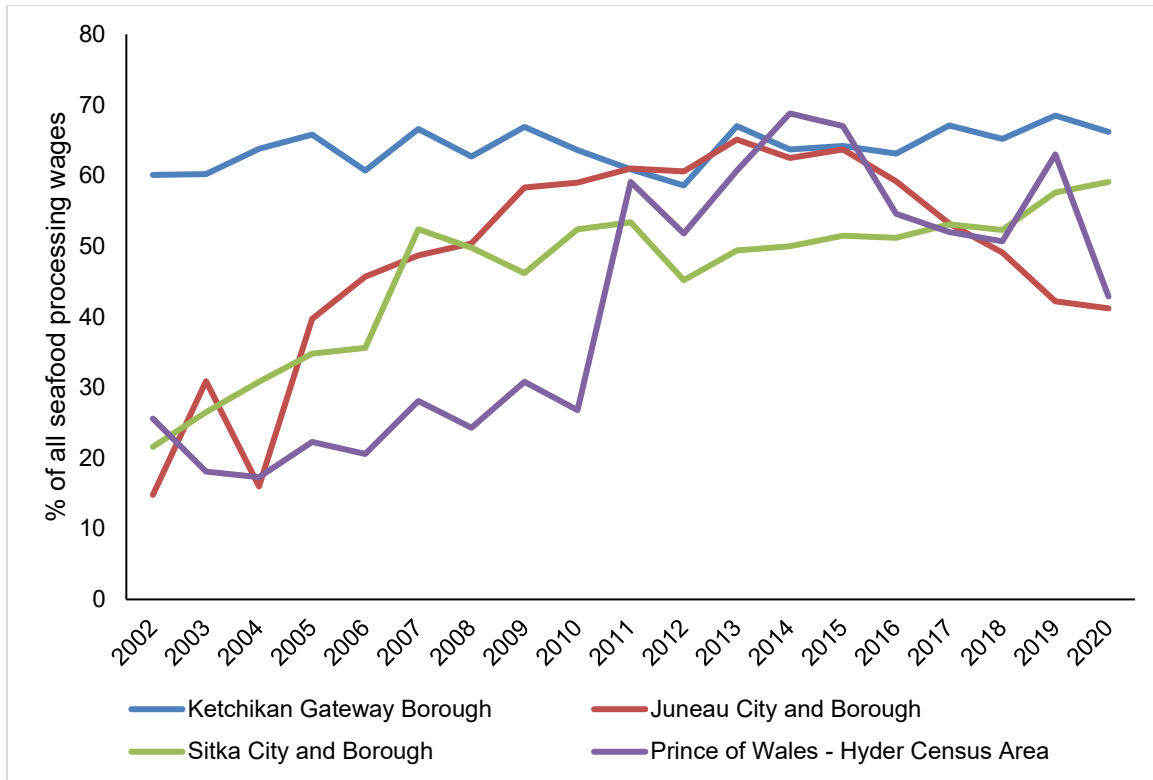


Figure 9. Percent of annual seafood processing wages earned by workers who are not permanent residents of these communities (ADLWD 2023b).

In sum, earnings from commercial fishing in Ketchikan have shown only moderate growth, the number of Ketchikan resident permit holders has declined by nearly half, seafood processing jobs have declined by more than one-third, and non-local workers continue to earn most of the seafood processing wages in the area (Table 14). Hatcheries throughout Southeast Alaska provide benefits to local commercial fishermen and sports fishermen, including those in Ketchikan. The upcoming sale of the Trident Seafoods processing facility in Ketchikan, which was announced in December 2023, may lead to further declines in the Ketchikan commercial fishing and seafood processing industries (Venua 2023).

Table 14. Trends in commercial fishing and seafood processing industries (ADLWD 2023b, Alaska Commercial Fisheries Entry Commission 2024, Southeast Alaska Conference 2023).

Community or Area	Increase in gross annual earnings from 1980 to 2022 ^a	% Change in number of resident permit holders, 1980-2022 ^a	% Change in annual number of processing employees, 2002-2019 ^b	Average % processing wages earned by nonresidents, 2002-2019 ^b ± standard deviation
Ketchikan Gateway Borough	\$16 million	-49.8	-37.9	75.8 ± 3.2
Juneau City and Borough	\$17 million	-60.6	154.7	57.7 ± 11.6

Community or Area	Increase in gross annual earnings from 1980 to 2022^a	% Change in number of resident permit holders, 1980-2022^a	% Change in annual number of processing employees, 2002-2019^b	Average % processing wages earned by nonresidents, 2002-2019^b ± standard deviation
Sitka City and Borough	\$56 million	-17.1	126.1	60.6 ± 12.3
Prince of Wales - Hyder Census Area	\$15 million	-31.1	-17.9	41.4 ± 19.9

^aData for these variables is from the Alaska Commercial Fisheries Entry Commission (2024).

^bData for these variables is from the ADLWD (2023b) and is only available through 2020. Data from 2020 was excluded due to unusually low salmon returns and declines in market value of seafood products due to COVID-19 (Southeast Alaska Conference 2023).

Timber Industry

Timber harvesting and processing was one of the largest economic contributors in Southeast Alaska for many decades but began declining amidst the growing conservation concerns and market downturns that led to the passage of the 1990 Tongass Timber Reform Act. Declines in timber harvesting ultimately resulted in the closure of several timber processing mills, including those in Ketchikan and Sitka (Bell 2014). Ketchikan lost 516 higher paying, year-round jobs when the Ketchikan Pulp Company (KPC) mill closed in 1997. In Sitka, 381 people lost similar jobs when the Alaska Pulp Company (APC) closed its mill in 1993. One year after the KPC mill closure, earnings in Ketchikan decreased by 7% and did not return to pre-closure levels for ten years. In comparison, earnings in Sitka fell 11% after the APC mill closure and did not return to pre-closure levels for seven years (Schultz 2010). The smaller decline in earnings in Ketchikan may be because Gateway Forest Products purchased the KPC facilities and reemployed many KPC workers (Landry 2001). However, the KPC mill only operated until 2001 (EPA 2019). Following the closure of the KPC mill, the Ketchikan Gateway Borough’s total population declined by 700 people and the total number of jobs decreased by 12% (Bell 2014). By the end of 1999, there were still 536 fewer jobs in the Ketchikan Gateway Borough (a 7% decline) than in 1996 (Baker 2001). From 1995 – 2003, Ketchikan school enrollment fell by 27%, due in large part to mill employees with school-aged children moving away from the area (Ketchikan Gateway Borough 2010b). As the timber industry declined, the tourism industry continued to grow and become more essential to the Ketchikan economy.

Tourism

The tourism industry has become a major feature of Southeast Alaska’s economy, accounting for 15% of all jobs and 9% of all earnings in the region in 2022 (Southeast Conference 2023). Most tourists arrive to the region by cruise ship. In 2022, 71% of the 1,652,223 visitors traveling to Southeast Alaska were cruise ship passengers. Cruise tourism is especially important in Ketchikan, which is the second busiest

cruise ship destination in the region after Juneau (Cruise Lines International Association 2020). The number of cruise ship passengers visiting Ketchikan has increased more than tenfold since the 1980s, from 90,000 visitors in 1983, to 1,186,400 in 2019 (Ketchikan Gateway Borough 2010a, Ketchikan Visitors Bureau 2023). Although Ketchikan receives more cruise tourism than most other communities in Southeast Alaska, KIC members have stated that this tourist industry does not necessarily provide substantial economic benefits to most residents or make the area nonrural (SERAC 2022a).

The COVID-19 pandemic completely halted the cruise industry in 2020, contributing to significant economic struggles in Ketchikan. While the loss of commercial income was severe, the pause in cruise ship activity did appear to improve opportunities for fishing and hunting across the region, including in Ketchikan (Cavaliere and Branstrator 2024, SERAC 2021a, 2022b). One member of the Southeast Council stated that having no cruise ships and far fewer people sport fishing “made the waterways of Southeast Alaska much more like what we remember them to be” (SERAC 2021a: 47). The number of visitors to Southeast Alaska began increasing again in 2021 (Robinson 2024). In 2023, the number of cruise ship visitors reached approximately 1.65 million, surpassing the previous high set in 2019 by 23% (Robinson 2024). In 2024, an estimated 1.48 million cruise ship passengers were expected to visit Ketchikan (Fernandez 2023).

Cruise tourism has a significant economic impact in Ketchikan. In 2017, visitors spent an estimated \$187 million in the area (Ketchikan Visitor’s Bureau 2018). An estimated 38% (or \$85 million) of this total was spent on gifts, souvenirs, and clothing, 30% (or \$67 million) spent on tours and activities, 7% (or \$16 million) spent on food and beverage, and 2% (or \$5 million) spent on lodging (Ketchikan Visitor’s Bureau 2018). It was estimated that cruise ship crew members spent an additional \$7 million in Ketchikan in 2017 (Ketchikan Visitor’s Bureau 2018). This spending is estimated to have generated 1,350 direct jobs, 400 indirect jobs, and \$76 million in direct labor income. However, most tourism jobs are seasonal, lower-paying, part-time positions in retail, tours, and transportation (Ketchikan Gateway Borough 2010a). Local news coverage reports that at the end of the season, “within a few day period, the town will be boarded up downtown. Literally, most of the businesses will be closed. And then the people [the tourists and seasonal residents] will leave town” (Block 2017). However, economic analyses suggest that while the tourism industry creates retail jobs that are primarily seasonal, the economic benefits of these jobs persist beyond just the summer cruise season. For instance, the number of retail jobs in January, when there is no cruise tourism, increased from 741 in 2002 to 848 in 2008 (an 18% increase). Similarly, business sales from January to March increased from \$70 million in 2002, to around \$138 million in 2008 – a 97% increase, not accounting for inflation (Ketchikan Gateway Borough 2010a).

In addition to visitor spending, Ketchikan’s tourism industry generates revenue through the Commercial Passenger Vessel (CPV) excise tax. Revenue from this fund is distributed to cities and/or boroughs based on the number of cruise ship passengers they receive. From Fiscal Year 2013 through Fiscal Year 2022, Ketchikan City and the Ketchikan Gateway Borough received \$46,841,256 of the state’s total CPV revenue (26.6%), Juneau received \$50,179,015 (28%), and Sitka received \$3,772,090 (2.1%) (State of Alaska 2023). These funds are limited in that they may only be used for port facilities, harbor infrastructure, and other cruise tourism services. Cruise lines themselves also spend funds on moorage

and docking fees, transportation, provisioning, and business supply fees. In 2017, cruise lines spent an estimated \$29 million in Ketchikan (Ketchikan Gateway Borough 2022).

Tourism continues to grow across the region (Southeast Conference 2023). With funding from Norwegian Cruise Line, Ketchikan recently converted the old Ketchikan Pulp Mill facilities at Ward Cove into a dock that can accommodate two additional cruise ships. This dock became operational in 2021 and may increase the total number of yearly visitors to the city (City of Ketchikan 2020, Lubbers 2021a). In Sitka, a new, privately-owned dock became operational in 2021 (Woolsey 2021a). The opening of this dock has been correlated with a sharp increase in the number of cruise ship passengers visiting Sitka, which jumped from around 250,000 passengers before 2020, to 560,000 in 2023 (Rose 2024, Tunney 2023). In Juneau, Norwegian Cruise Lines purchased waterfront property in 2019, then transferred this land to Huna Totem, which has been approved to use the land to build a new cruise ship dock and other amenities (Anastas 2023). On POW, Huna Totem Corporation, Doyon Limited, and Klawock Heenya recently converted the old pulp mill dock in Klawock into a cruise ship port that can accommodate one large cruise ship (Darrell 2024, Pfalz 2024). This port in Klawock opened for the first time in summer 2024 (Darrell 2024, Pfalz 2024).

Juneau and Ketchikan have historically received the largest number of cruise visitors in the region (**Figure 10**). This pattern continued in the 2024 season, with Cruise Line Agencies of Alaska reporting that Ketchikan was scheduled to receive 652 port calls and Juneau was scheduled to receive 697. In comparison, Sitka was scheduled to receive 333, Icy Strait Point in Hoonah was scheduled to receive 202, Petersburg was scheduled to receive 69, Klawock was scheduled to receive 6, and Metlakatla was scheduled to receive 7 (Cruise Line Agencies of Alaska 2024).

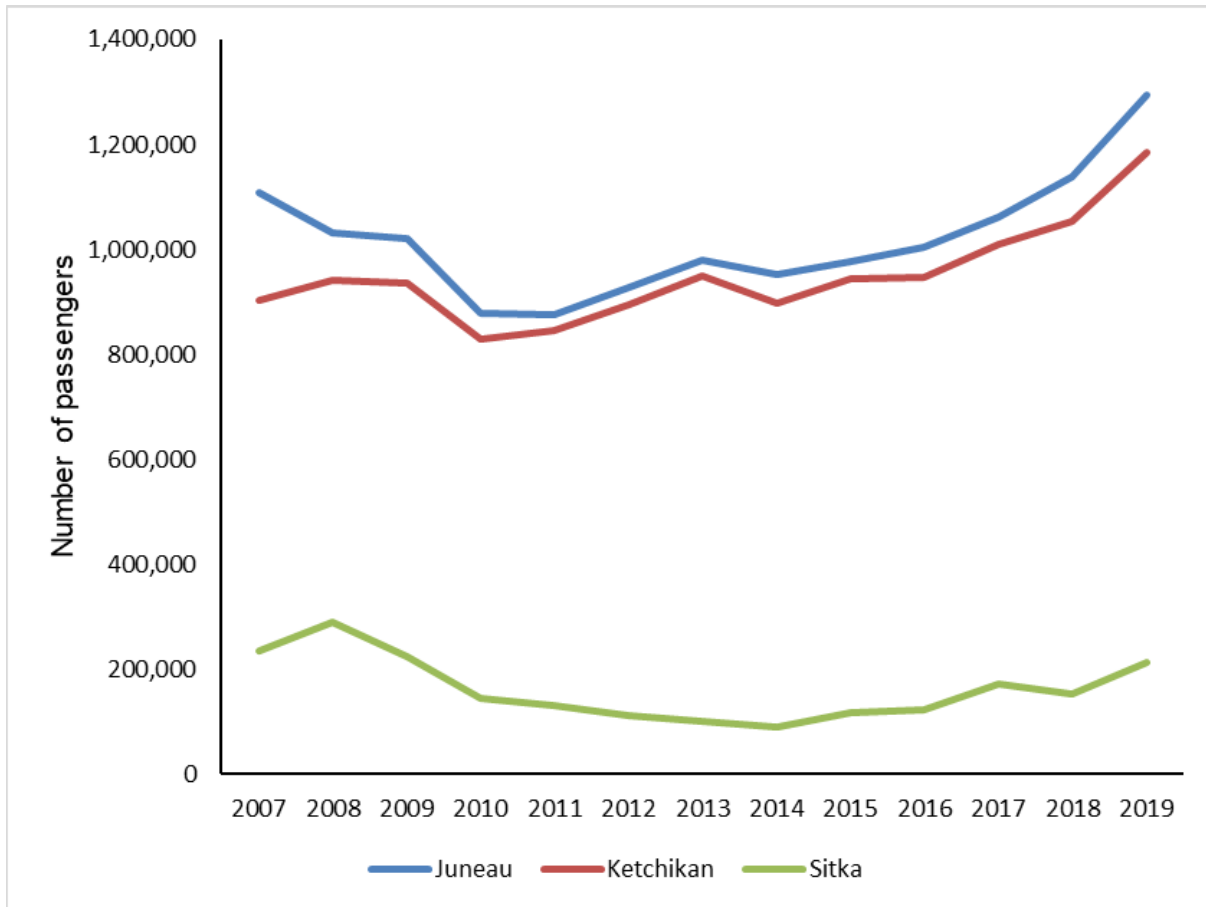


Figure 10. Annual number of cruise ship passengers visiting three communities in Southeast Alaska.

*Data from 2020 and 2021 were not included as they are not representative of typical cruise tourism activity; data from 2022 was not included as it was incomplete (State of Alaska 2023).

While there are clear economic benefits from cruise ship tourism, some residents across the region report that cruise tourism also has substantial negative impacts in their communities. The recent release of Ketchikan’s 2023 tourism strategy notes that cruise tourism “is putting a strain on the community, its infrastructure, and natural resources. The destination is now facing a range of interrelated challenges: over-reliance on cruise tourism, traffic congestion, aging infrastructure, persistent workforce shortages, and limited workforce housing” (Ketchikan Gateway Borough 2023). Residents have expressed concerns that bus traffic transporting cruise ship visitors will strain aging infrastructure and that tourism levels strain emergency response resources (Darrell 2023a, 2023b). Residents also struggle to find affordable housing as seasonal rentals become more common, driving increases in rental prices and making it more common for rentals to only be available for six months at a time (KIC 2024).

Similar sentiments are expressed throughout the region. For instance, in Sitka, residents recently voted on a proposal to limit the number of cruise ships that can arrive each day. Although the measure did not pass, one resident voiced concern that growth and development from tourism may cause the city to lose its nonrural status within the Federal Subsistence Management Program (Rose 2024). For the 2024 season, Juneau was said to be allowing no more than five cruise ships to dock per day and was discussing

potentially limiting the number of passengers visiting the city in future seasons (Larson 2024). However, the 2024 cruise ship calendar for Juneau indicated that the city would regularly receive up to six-to-seven cruise ships per day from May to September (Travel Juneau 2024).

At Southeast Council meetings and Federal Subsistence Board meetings, Council members have shared local ecological knowledge pertaining to the effects of the cruise industry, including the practice of dumping polluted wastewater in subsistence fishing areas (SERAC 2018a, 2018b, 2019b, 2022a), increased competition with sports fishermen arriving by cruise ships (SERAC 2019a, 2021a, 2021b, 2022a, 2022b), subsequent declines in fish and wildlife populations (SERAC 2016, 2018a, 2019a), and increased dependence on imports as local retailers shift to a focus on souvenirs rather than locally used goods (FSB 2005). Specifically, residents have noted that cruise ship wastewater dumping in the Ketchikan area increasingly prevents the gathering of subsistence foods and has polluted shorelines to the extent that residents can no longer swim in the waters (SERAC 2018a, 2019a).

Government Employment

Government jobs have long been important sources of year-round employment across all Southeast Alaska communities. In 2022, 29% of all jobs in Southeast Alaska were in local, State, or Federal government positions, and 32% of all earnings came from government jobs (Southeast Conference 2023). However, there has been a 25% decline in the number of State and Federal jobs throughout the region since 2012 (Southeast Conference 2023). In Ketchikan, the relative declines of State and Federal jobs have both been quite high (see **Figure 11**). Furthermore, the relative growth of local government jobs, such as positions in public administration, public education, or Tribal governance, has been comparatively low (**Figure 11**). Since 2009, State government positions have decreased by about 30%, and Federal government positions have decreased by 32% in Ketchikan. Juneau also experienced notable, but less extreme losses of State (21%) and Federal (15%) positions. While Sitka has experienced a relatively greater decline in the number of Federal jobs (40%) available, declines in State jobs (6%) have been comparatively small. POW communities experienced the smallest relative changes in the government job sector, with a 14% decline in the number of Federal positions and a 3% decline in the number of State positions (**Figure 11**). However, there have always been relatively fewer State and Federal jobs available on POW.

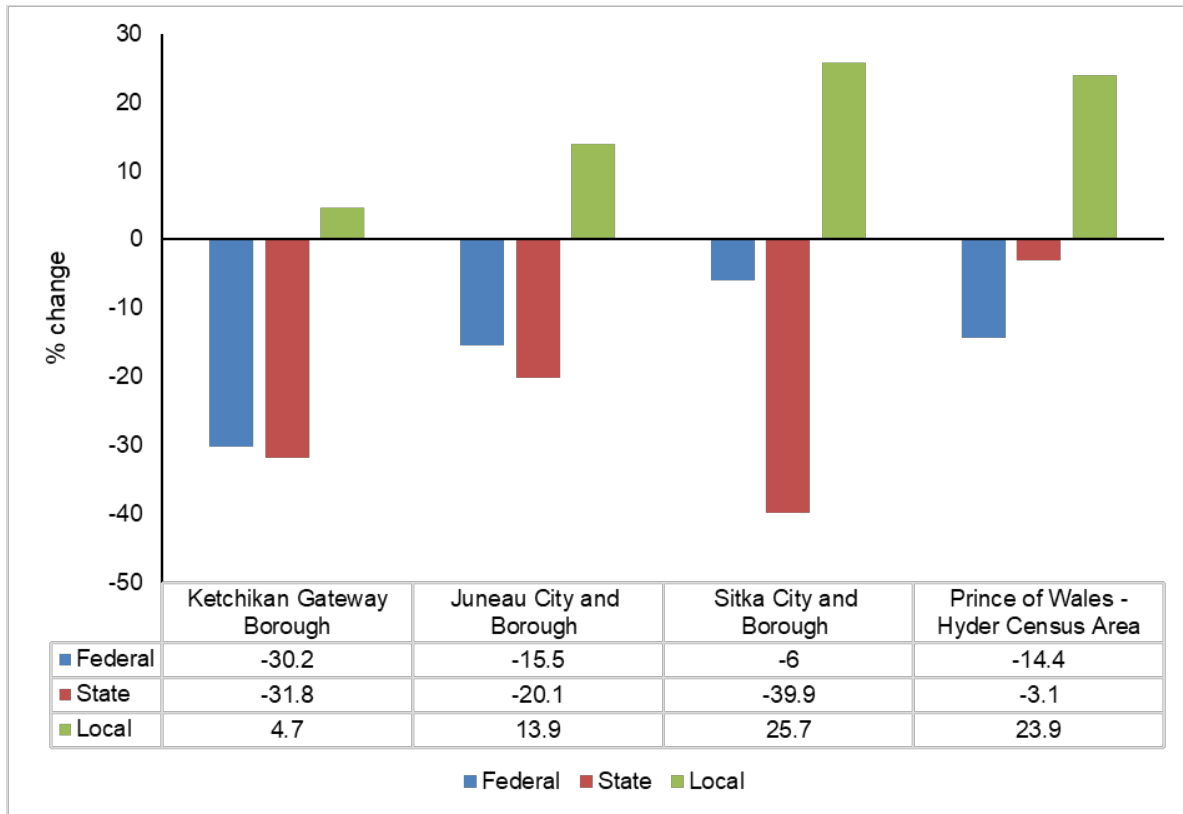


Figure 11. Percent change in number of Federal, State, and Local government jobs across area from 2009 to 2022. (ADLWD 2023c)

Healthcare

Healthcare represents another major source of year-round employment in Southeast Alaska, comprising 10% of the regional workforce in 2022 (Southeast Conference 2023). However, employees who are not from Southeast Alaska make up a notable portion of the healthcare workforce. In 2021, 18% of Southeast Alaska healthcare workers were not residents of the region (Alaska Hospital & Healthcare Association 2023). Labor shortages in the healthcare industry often result in non-local workers filling short-term contract positions throughout the state (Alaska Hospital & Healthcare Association 2023). Although healthcare wages are increasing, changes in the number of healthcare jobs are highly variable across communities. For instance, from 2014 to 2021, the number of healthcare jobs increased marginally in Ketchikan, increased notably in Sitka, and declined notably in Juneau and POW (see **Table 15**).

Table 15. Average annual number of jobs in health care and social assistance, by community. (ADLWD 2023c).

Community or Area	2014	2021	% Change
Ketchikan Gateway Borough	913	944	+3.3
Juneau City and Borough	1,716	1,546	-9.9
Sitka City and Borough	607	754	+24.2
Prince of Wales – Hyder census area	102	76	-25.5

As of 2019, the top health care employers in the region were the Southeast Alaska Regional Health Consortium (SEARHC) (1,200 staff), Juneau's Bartlett Regional Hospital (650 staff), and Ketchikan's PeaceHealth Medical Center (500 staff) (Southeast Conference 2019). As of 2023, 75% of all regional health workers were employed by these three entities (Alaska Hospital & Healthcare Association 2023). SEARHC employs staff in facilities throughout the region, including a hospital in Sitka, clinics in Hydaburg, Craig, Klawock, and Juneau, itinerant health services in Kasaan, Thorne Bay, Coffman Cove, Whale Pass, Point Baker, Port Protection, Naukati, and Edna Bay, and shared services in Ketchikan and Metlakatla.

The healthcare industry in Alaska is projected to grow over the coming years (Wiebold 2024), and there have been major healthcare developments across several communities in Southeast Alaska recently. In 2021, an urgent care clinic opened in Ketchikan, Juneau was in the process of building a \$14 million behavioral health building, and Sitka agreed to a sale of its hospital to SEARHC, which will result in an updated critical care services building (Lubbers 2021b, Woolsey 2021b). In the coming months, a new outpatient substance use disorder clinic is scheduled to open in Ketchikan, which is a partnership between KIC, Ketchikan Tribal Business Corporation, and SEARHC (Laffrey 2024). Similar programs established by SEARHC already exist in Juneau, Sitka, and Klawock (SEARHC and KTBC 2024).

Other Industries

One economic sector that is also substantially different in Ketchikan than in other nearby communities is that of shipbuilding and repair. The shipyard provides both seasonal and year-round jobs that pay on average 60% more than other typical private wage sectors in Ketchikan (AIDEA 2016, Ketchikan Marine Industry Council 2014). Most shipyard positions are available during the fall, winter, and spring, serving as a stable counterpoint to seasonal fishing and tourism jobs (AIDEA 2016). Unlike other industries, nearly all jobs at the Ketchikan shipyard are held by Ketchikan Gateway Borough residents (Ketchikan Gateway Borough 2010a, Ketchikan Marine Industry Council 2014). From 2003 to 2013, employment at the Ketchikan shipyard grew from 60 to 160 positions (Ketchikan Marine Industry Council 2014). From 2007 to 2014, several improvements were made to the shipyard, including building a new dry dock, installing a land-level berth, opening an assembly and production hall, and building a steel module fabrication facility (Ketchikan Marine Industry Council 2014). As of 2015, the shipyard employed an annual average of 157 people, ranging from 143 to 165 positions throughout the year (AIDEA 2016). The Ketchikan shipyard is the largest of its kind in Alaska and acts as the main maintenance facility for Alaska Marine Highway System (AMHS) vessels, and AMHS has recently moved their headquarters to Ketchikan. The shipyard has direct benefits for Ketchikan, but also for Southeast Alaska more broadly. Being able to service ships locally decreases the time ships are unavailable for local transportation and reduces the maintenance expenses for ferries, which helps lower ferry costs for residents.

In Sum, Ketchikan generally has more job opportunities and an overall stronger economy than POW communities. The economy of Ketchikan is more similar to that of Juneau and Sitka. However, Ketchikan has experienced increasing economic vulnerability in recent years, with declines in the commercial fishing and timber industries, as well as rising unemployment and supply chain issues associated with the COVID-19 pandemic. Residents of Ketchikan, particularly members of KIC, note that they have been hit

very hard by these issues and that the subsequent rise of tourism in Ketchikan has increased competition for wild resources while failing to provide the same types of reliable incomes previously available through commercial fishing and the timber industry.

Availability of Services

Community Services

The Council and others noted that the availability of socioeconomic services is a characteristic that should be considered in the analysis of a community's rural or nonrural status. A Ketchikan asset mapping project (Lynch 2019) and a list of wellness resources (Ketchikan Wellness Coalition 2019) provide detailed information on the socioeconomic services available in the Ketchikan Gateway Borough as of 2019. The number of businesses, entities, and/or groups providing services in Ketchikan reflect both its population size and its role as a hub community for the broader region.

At the time of writing, there were six grocery stores and five fuel stations in the Ketchikan area, including those in Saxman. Two of these grocery stores are national chains, two are regional chains, and two are small, independent stores. One of the regional chain stores, Three Bears, located along the highway between Ketchikan and Saxman, recently opened in May 2023, following the loss of a longstanding, locally owned grocery store in February 2020 (Miller 2023a, Page 2020). There are ten childcare facilities, three public elementary schools, three public combined elementary/middle schools, one traditional public high school, one alternative public high school, and one private school. The Ketchikan area also has one US Postal Service location and three other private postal service locations, a University of Alaska campus, one public library, 25 churches and faith-based organizations, eight banks, two fire departments, a police department, a volunteer rescue squad, a US Coast Guard base, and an Alaska State Troopers' office. There is one hospital and one tribal medical facility in Ketchikan, but several additional medical facilities and care providers are also in the area.

Additionally, numerous businesses and organizations offer services related to food security, housing insecurity, mental health, youth development and support, addiction and recovery, senior services, home health and hospice, real estate, career development, and family and community support. KIC provides many tribal services, including medical facilities, youth support and development, senior care, career training, and other social services (**Table 17**). Notably, the largest and most accessible shelter for individuals experiencing homelessness closed in May 2024, which will pose significant challenges for Ketchikan residents who have become housing insecure due to loss of income and evictions (KIC 2024). Many of the services in Ketchikan are used by residents throughout the region, including those of Saxman and POW. Public testimony notes that residents of surrounding communities rely on the ferry to travel to Ketchikan to shop at area stores (SERAC 2019a). In terms of the number of facilities providing services, Ketchikan is more similar to Juneau and Sitka than to the smaller communities on POW like Craig and Klawock (**Table 16**).

Table 16. Number of service-providing facilities across Southeast Alaska Communities (DCRA 2023).

Community or Area	Hospitals	Health Centers	Airports	Seaplane bases	Post Offices	Libraries	Schools
Ketchikan Gateway Borough	1	2	1	5	1	1	8
Craig	0	1	0	5	1	1	3
Klawock	0	2	1	1	1	0	1
Sitka	2	1	1	5	1	1	6
Juneau	1	2	1	3	4	2	11

Table 17. Services available in the Ketchikan area (based on information from Lynch 2019, Ketchikan Wellness Coalition 2019).

Type of service	Businesses, entities, and/or groups providing service
Grocery	Walmart; Safeway; A&P; Three Bears (Saxman/Ketchikan); Lighthouse Grocery; Sea Imports
Fuel	Three Bears Fuel Station (Saxman/Ketchikan); Tatsuda's Gas at Last; Safeway Fuel Station; Westside Services; Ketchikan Petro One
Childcare facilities	Clover Pass Christian School; Liz's Daycare; Taylor Made Child Care; First Lutheran Child Care Center; Wee Ones Daycare; Gateway Christian School; Palmer Daycare; Jody's Daycare; AVG Childcare Center; First City Kid Care
Schools	Point Higgins Elementary School; Fawn Mountain Elementary School; Houghtaling Elementary School; Schoenbar Middle School; Ketchikan Charter School; Tongass School of Arts and Sciences; Ketchikan High School; Revilla Jr / Sr High School; Clover Pass Christian School
Postal Services	US Postal Service (1); FedEx Ship Center (2); Frontier Shipping & Copyworks
Universities	University of Alaska Southeast, Ketchikan Campus
Food security	Ketchikan Presbyterian Church Food Pantry; Ketchikan High School Food Pantry; Schoenbar Middle School Food Pantry; St. John's Episcopal Church; The Lord's Table; Salvation Army
Social services	Akeela / Gateway Center for Human Services; Alaska Legal Services; Alaska Public Assistance; Ketchikan Indian Community Deermount Street Facility; Ketchikan Public Library; Lions Club Ketchikan; Love in Action; Salvation Army, Gateway Corps; Catholic Community Services; Ketchikan Reentry Coalition
Senior services	AARP Ketchikan; Community Connections; Ketchikan Indian Community Deermount Street Facility; Ketchikan Pioneer Home; Rendezvous Senior Day Services; Southeast Alaska Independent Living; Southeast Senior Services; The Manor LLC
Housing services	Alaska Housing Finance Corp; Glacier Park Apartments; Ketchikan Indian Community Stedman Street Facility; Park Avenue Temporary Home; Women in Safe Homes
Real estate	Re/Max; Gateway City Realty; Providence Properties; Big Dawg Realty; Coastal Realty; Ketchikan Realty
Financial services	Credit Union 1; Key Bank; Northrim Bank; Alaska USA Federal Credit Union; First Bank; Tongass Federal Credit Union; Wells Fargo; Global Credit Union

Type of service	Businesses, entities, and/or groups providing service
Home health / hospice	Consumer Direct; Cornerstone Home Health Care; New Horizons Long Term Care
Career services	Department of Labor; Ketchikan Indian Community Stedman Street Facility; Ketchikan Job Center; SEA Link, Inc.; Community Connections; Ketchikan Job Center
Counseling services	Be Well Counseling; Destiny Coaching Services; Family Care Counseling; Karla Gelhar, LMFT; Oilean Wellbeing, LLC; Patricia Hauser, LCSW; Rainwood Counseling; Round Table Counseling & Mediation Services; Susan M. Porter, PhD; Your Space Counseling; Karla Gelhar
Youth services	Boys and Girls Club of Ketchikan; Early Learning Program; Community Connections; Ketchikan Indian Community Stedman Street Facility; Ketchikan Public Health Center; Ketchikan Youth Initiatives; Residential Youth Care, Inc., Young Life; Ketchikan Gateway Center; Office of Children's Services
Family / community services	Janai Meyer, Nutrition & Lactation; Alaska Parenting & Breastfeeding Village support group; Behavioral Health support group; Bereavement Support Group; Caregiver Support Group (Saxman Senior Center); Compassionate Friends Support Group; Kids Group; Low Vision & Blindness Support Group; Parent & Caregiver support group; Traumatic Brain Injury support group; Women's Group; Young in Recovery; First City Council on Cancer; Ketchikan Animal Shelter; Diabetes Education Support Group; Elks Lodge; Ketchikan Public Library; Ketchikan Gateway Center; Ketchikan Wellness Coalition
Tribal services	Ketchikan Indian Community
Health Services	Creekside Family Health Clinic; Harmony Health Clinic; Ketchikan Indian Community Health Facility; Ketchikan Indian Community Dental Clinic; Ketchikan Public Health Center; Legacy Health Clinic; PeaceHealth Ketchikan Medical Center; Northway Family Healthcare Clinic; Optimum Health and Wellness Physical Therapy; Power of Wellness; Rainforest Family Healthcare Clinic; Serenity Health & Wellness; Southeast Alaska Prosthetics & Orthotics; True North Health & Wellness; Ketchikan Pediatric Occupational Therapy; Ketchikan Eye Care; Tingey Orthodontics; Southeast Pediatric Dentistry; Arctic Chiropractic Center; Ketchikan Chiropractic Center; Northland Audiology Clinic; Dentists (15); Acupuncturist (1)
Addiction / recovery	Ideal Option; KAR House Residential Center Courage to Change Support Group; Alcoholics Anonymous Support Group; Narcotics Anonymous support group
Faith organizations	Baha'I Faith; Calvary Bible Church; Church of Christ; Church of Jesus Christ Latterday Saints; Church of Nazarene; Clover Pass Community Church; First Assembly of God; First Baptist Church; First Lutheran Church; First United Methodist Church; Good News Fellowship; Holy Name Catholic Church; Holy Truth Lutheran Church; Iglesia Ni Cristo; Ketchikan Community Church; Ketchikan First Assembly of God; Ketchikan Presbyterian Church; Lighthouse Church of God; North Tongass Baptist Church, SBC; Open Door Fellowship; Seventh-Day Adventist Church; South Tongass Alliance Church; St. John's Episcopal Church; Salvation Army Gateway Church; Gateway Baptist Church
Transportation	Ketchikan Gateway Borough Transit System; Sourdough Cab; Alaska Marine Highway Service; Yellow Taxi

Type of service	Businesses, entities, and/or groups providing service
Cultural resources	Ketchikan Indian Community Stedman Street Facility; Filipino Community Center
Veteran Services	Ketchikan VFW
Emergency Services	Alaska State Troopers; Ketchikan Volunteer Rescue Squad; North Tongass Fire Department; Ketchikan Coast Guard; South Tongass Fire Department; Ketchikan Police Department

Transportation Infrastructure

As it does with other services, the Ketchikan area serves as a transportation hub for the region. It has a regional airport (Ketchikan International Airport), five seaplane bases, and it is the location of the Alaska Marine Highway System (AMHS) headquarters. Ketchikan is also the first stop for incoming barges and cruise ships. It is also close to Prince Rupert, BC, which has both cargo facilities and rail connection to larger population centers (Miller 2023b). However, ferry service to Prince Rupert has been temporarily unavailable since the summer of 2023 (Miller 2023b).

The Inter-Island Ferry Authority has provided daily transportation between Ketchikan and Hollis since 2002. From 2006-2008, the Inter-Island Ferry also offered a northern route connecting Ketchikan to Coffman Cove, Petersburg, and Wrangell during summer months, but this route was discontinued after 2008 due to low ridership (Inter-Island Ferry Authority 2024, Ketchikan Gateway Borough 2010a). Because goods and transportation vessels must pass through Ketchikan, economic growth in other areas of the region also typically results in economic growth in Ketchikan (Ketchikan Gateway Borough 2010a).

The Ketchikan International Airport is a state-owned airport that is managed by the Ketchikan Gateway Borough. It recently underwent \$1,807,604 in upgrades and maintenance (Division of Statewide Aviation 2021). The number of visitors traveling through the Ketchikan International Airport have consistently increased from 94,000 passengers in 2002, to 117,728 passengers in 2021 (Ketchikan Gateway Borough 2010a, FAA 2022). In comparison, in 2021, there were 306,512 passengers at the Juneau International Airport, 80,366 at the Sitka Rocky Gutierrez Airport, and 14,157 at the Klawock Airport (FAA 2022).

The presence of the Ketchikan Shipyard provides a critical service to the region in that it facilitates maintenance of barges and ferries (AIDEA 2016). This service is especially critical as there are relatively few freight companies servicing Southeast Alaska. The two primary companies include the Alaska Marine Lines and Samson Tug and Barge. Under the umbrella company Lynden, Alaska Marine Lines has locations in Craig, Juneau, Ketchikan, and Sitka—as well as other Alaska communities—and provides twice weekly barge service to Southeast Alaska from Seattle (Alaska Marine Lines 2024). Samson Tug and Barge is based out of Sitka and relies on Alaska Marine Line vessels to transport cargo from Seattle to Ketchikan. From Ketchikan, Samson Tug and Barge contracts with Boyer Towing to transport their own cargo and Alaska Marine Line’s cargo throughout Southeast Alaska (City of Wrangell 2021). There were previously other, smaller barge operators serving Southeast Alaska communities, such as Alaska Outport and Western Pioneer, but these companies have since gone out of business (Ketchikan Gateway Borough 2010a).

Departure schedules provided by Alaska Marine Lines indicate that vessels depart for Ketchikan, Juneau, and Sitka twice a week and take three, five, and six days to arrive, respectively. In comparison, barges depart for Prince of Wales Island locations once per week and take four to five days to arrive (Alaska Marine Lines 2024). Voyage logs from Alaska Marine Lines show that from mid-February to mid-March 2024, Ketchikan received barges from Seattle nine times. In that same time frame, Juneau received incoming barges nine times, Sitka received incoming barges seven times, POW received incoming barges four times, and Metlakatla received incoming barges three times (Alaska Marine Lines 2024). Testimony provided by residents of Ketchikan, Angoon, and Sitka document that both barges and ferries have been unreliable in recent years (SERAC 2020a, 2020b, 2022b). Although Ketchikan receives barges more regularly, public testimony from a Ketchikan resident noted that grocery stores still struggle to stay stocked and have limited supplies (SERAC 2022a). Part of this issue is due to frequency of cargo shipments, and because people are “constantly fighting with other consumers,” to buy products before they are sold out (SERAC 2022a).

Ferry service has generally been declining throughout the Southeast region. From 1995 to 2008, the annual number of Alaska Marine Highway passengers declined from approximately 58,000 to 38,000 (Ketchikan Gateway Borough 2010b). Recently, ferry service has primarily been limited by labor shortages (Denning 2023). In summer 2023, only six of the nine AMHS ferries were operational (Denning 2023). AMHS service levels had been declining across all communities for many years and were further dampened by the effects of the COVID-19 pandemic (Alaska Marine Highway System 2023).

The road system in the Ketchikan area includes the Tongass Highway and associated roadways on Revillagigedo Island, as well as roadways on Gravina Island. Public news sources indicate that Ketchikan’s roadways are aging and in need of notable repair (Darrell 2023a). The Alaska Department of Transportation and Public Facilities (2023) reported that of the twenty-three Southeast region infrastructure improvement projects scheduled for 2023, six were in Ketchikan. In comparison, three projects were scheduled for Sitka, seven were scheduled for Juneau, and one was scheduled for POW. Other in-progress infrastructure developments in the Ketchikan Gateway Borough include a new berth facility in Saxman, which would shorten the ferry route between Metlakatla and the Ketchikan area. The future Saxman Seaport “will boast a Three Bears grocery store, an Ace Hardware, a boat launch, more than 70 parking spaces, loading lanes, and a ferry terminal” (Miller 2023c). With its number and breadth of services, Ketchikan is already one of the main hubs of Southeast Alaska and plans for growth may help to stabilize the community’s economy.

Other Alternatives Considered

1. Revise the Geographical Boundaries of the Nonrural Ketchikan Area to make it smaller: Changing the boundaries of the nonrural Ketchikan Area to correspond only to the geographical extent of Ketchikan City is a compromise under the current Federal Subsistence Management Program policies governing Nonrural Determinations. Under this alternative, Ketchikan City would maintain nonrural status and all permanent residents of the broader Ketchikan Gateway Borough residing beyond the city limits would be considered rural residents. This alternative would allow some additional Ketchikan Gateway Borough

residents to gain rural status under Federal subsistence regulations, while those who reside in the most densely populated and well-serviced portion of the Area would remain nonrural. Using the most recent census data presented in **Table 1**, roughly 5,408 (39%) of the Ketchikan Gateway Borough’s estimated 13,762 residents would potentially be considered rural, federally qualified subsistence users under this alternative. Yet, this alternative would not actually result in an additional >5,000 people gaining rural status in the area, as those residents located beyond the current nonrural Ketchikan Area boundary are already considered rural, federally qualified subsistence users. This alternative would also reduce user confusion about the outdated boundaries of the current nonrural Ketchikan Area by linking them to the city limits. However, Ketchikan City can not be clearly distinguished from the rest of the Ketchikan Gateway Borough in regard to the harvest of wild resources, and testimonies have so far not suggested that there is a categorical socioeconomic difference between Ketchikan City and the rest of the Borough.

2. Revise the Geographic Boundaries of the Nonrural Ketchikan Area to make it larger: Changing the boundaries so that the nonrural Ketchikan Area includes all residents residing along the Tongass Highway except those of Saxman partially aligns with the 2006 Board action to change the nonrural boundaries—an action that was later rescinded (see “Secretarial Review of the Federal Subsistence Management Program and Rural Determination Process” section). The current boundaries of the nonrural Ketchikan Area were initially established in the 1990s, when paved portions of the Tongass Highway ended at those boundary markers. The Tongass Highway has since been extended in both directions and housing has expanded beyond the current nonrural boundaries. Further, the CDPs of Clover Pass, North Tongass Highway, Ketchikan East, Mountain Point, Herring Cove, and Saxman East have all been dissolved since this time. This means that, for many years, the definition of the nonrural Ketchikan Area has been partially based on CDPs that no longer exist. Furthermore, there is currently no specific harvest or subsistence data available to distinguish between Tongass Highway residential areas and Ketchikan City. Therefore, the current boundaries dividing the nonrural residents of the Tongass Highway from the rural residents are geographically arbitrary but functionally meaningful, as those living outside the nonrural Ketchikan Area boundaries are federally qualified subsistence users. Revising the boundaries of the nonrural Ketchikan Area to include all residents along the Tongass Highway except Saxman would improve the consistency, fairness, and enforcement of Federal regulations in this area. However, unlike Alternative 1, this alternative would result in fewer Ketchikan Area residents being eligible to harvest resources under Federal subsistence regulations. This option has not been taken up since the recent changes to the Nonrural Determination Policy went into effect in 2015 because the Board cannot change the rural or nonrural determination for a particular area without providing the affected Council and public with opportunities to comment.

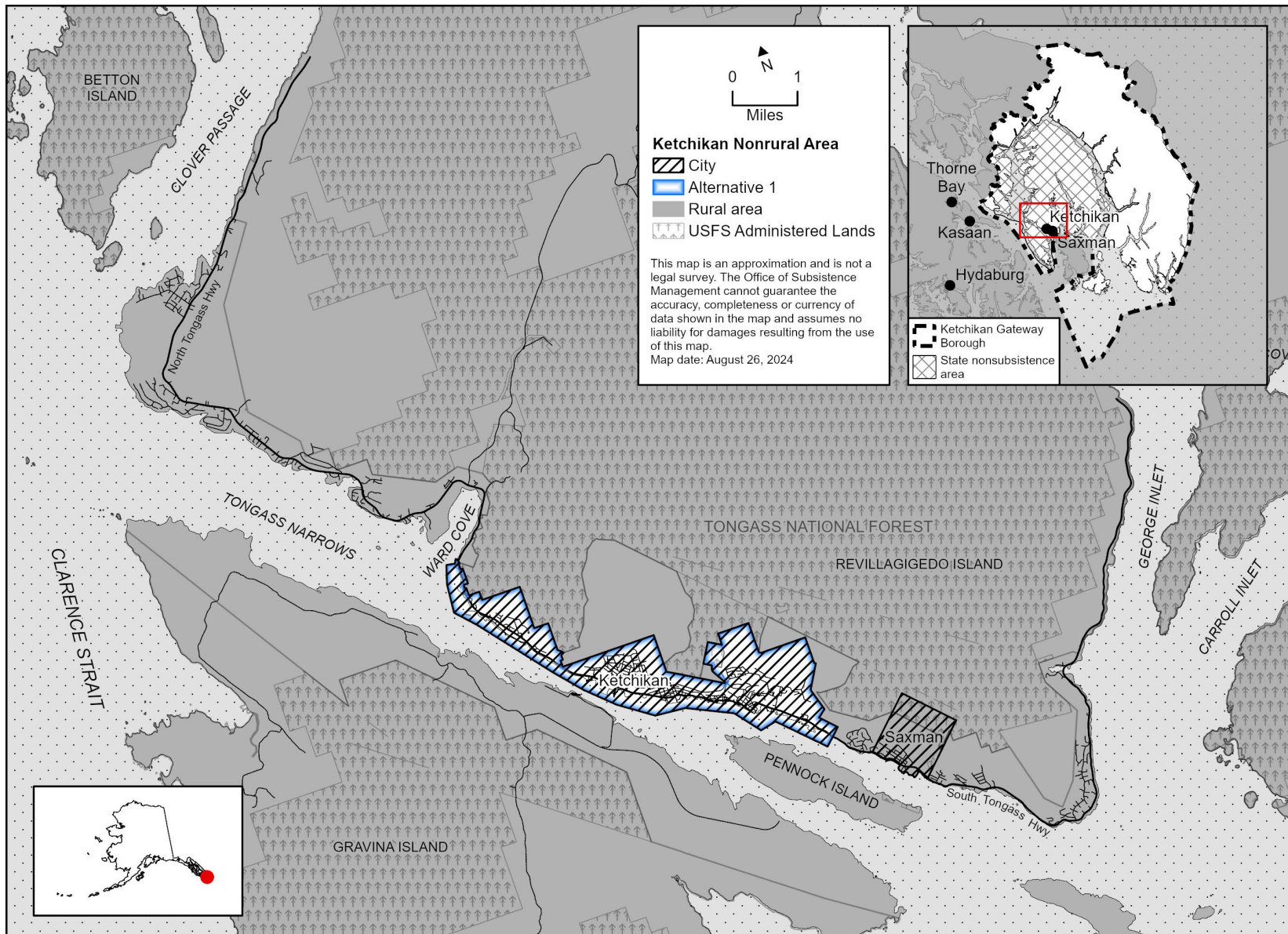


Figure 12. Alternative 1: Revise the geographic boundaries of the nonrural Ketchikan Area to make it smaller (for informational purposes only).

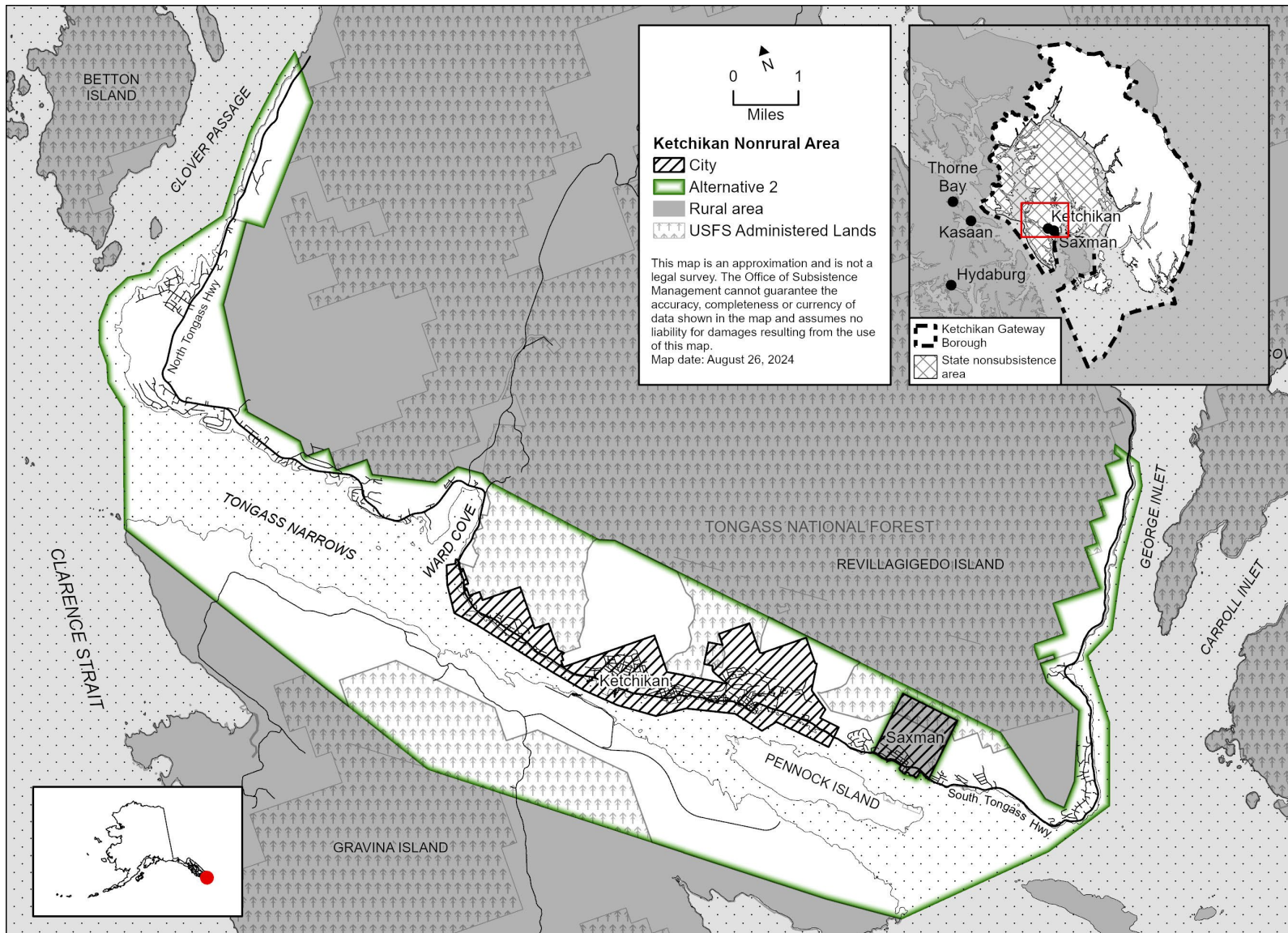


Figure 13. Alternative 2: Revise the geographic boundaries of the nonrural Ketchikan Area to make it larger (for informational purposes only).

Effects of the Proposal

If this proposal is adopted as written, all residents of the Ketchikan Area will become eligible to harvest fish and wildlife on Federal public lands under Federal subsistence regulations. With rural status, residents of the Ketchikan Area would be considered federally qualified subsistence users with customary and traditional use determinations for subsistence resources currently open to rural residents of Units 1-5. Ketchikan residents would also be able to participate more directly in Federal subsistence management processes and programs impacting the harvest and conservation of subsistence species in and around Ketchikan, if the Ketchikan Area were to be considered rural. Ketchikan residents would specifically have greater opportunities to harvest deer, elk, and goat on Federally managed lands in Game Management Units 1-4 (see **Appendix B**). Additionally, federally qualified subsistence users who are residents of Units 1-5 may designate another federally qualified subsistence user from Units 1-5 to take deer, moose, and goats on their behalf, unless unit-specific regulations preclude or modify the use of a designated hunter. In the waters of Units 1 and 2, Ketchikan residents would have greater harvest opportunities to harvest salmon, Eulachon¹, trout, and Dolly Varden under Federal regulations (**Appendix B**). The most significant anticipated effects of a rural status change in terms of fish and wildlife harvests by Ketchikan residents would be to Unit 2 deer, Unuk River Eulachon, and salmon in Units 1 and 2. Ketchikan residents' access to some resources, such as halibut, aquatic plants, berries, and shrimp would not change because those resources are either outside the jurisdiction of the Federal Subsistence Management Program or because there are little Federal submerged waters in the Ketchikan area (**Appendix B**).

While the Board's policy states that nonrural determinations should be made solely on the basis of a community or area's rural characteristics or lack thereof, recent public testimony and Council discussion clearly indicated substantial concern about the potential impacts a rural designation for Ketchikan would have on resource competition and conservation in the area (SERAC 2024). Testimony received at the October 2024 Southeast Council meeting noted that user competition would increase for deer in Unit 2 and Unuk River eulachon, and that this increased competition would likely lead to conservation concerns and reductions in subsistence harvests by residents of smaller communities close to Ketchikan (SERAC 2024). Council and public testimony also suggested that salmon harvest would likely increase, possibly causing conservation concerns. Council members and public testifiers also noted their concern that existing tools to address these issues (e.g., changes to harvest limits and seasons, closures to NFQUs, and Section 804 user prioritizations) would be insufficient to allow for the continuation of subsistence uses, and/or would not be implemented in a timely enough fashion to minimize likely impacts on current rural residents and resources.

If this proposal is not adopted, the current Ketchikan Area will remain "nonrural," and residents of the area will not be eligible to harvest resources under Federal subsistence regulations. Residents seeking to harvest wild resources for subsistence purposes would continue to be required to do so under State of Alaska sport or personal use regulations.

¹ The state has a 50lb limit on the Unuk in regulation which could potentially be slightly higher than the current Federal harvest limit (5 gallons). However, Eulachon harvest on the Unuk has been closed to NFQUs through special action in several consecutive years, since the substantial decline in Eulachon populations in the area.

OSM CONCLUSION

Neutral on NDP25-01

Justification

The data in this analysis on the rural character of Ketchikan is inconclusive. There is evidence to suggest that the Ketchikan Area could reasonably be considered rural or nonrural. Ketchikan is a relatively large, but isolated community with limited road access. It is surrounded by rainforest, rugged mountains, and the sea. The local economy has been in decline since the closing of the pulp mill and has become much more dependent upon seasonal employment and industries like tourism when compared to the 1970s – 1990s. Poverty rates in Ketchikan are substantial and have been increasing in recent years, along with housing shortages, rising rents, and declining social services. Goods and materials are shipped into Ketchikan primarily by barge and this supply chain is vulnerable to disruptions, often leaving Ketchikan with limited foods available for purchase in grocery stores. This situation was magnified during the recent COVID-19 pandemic. Many Ketchikan residents, particularly KIC members and other indigenous residents, rely on local natural resources like salmon and deer for sustenance and cultural identity. The use of fish and wildlife resources, including harvesting, processing, sharing, and consuming these resources, is widespread in Ketchikan, especially considering that it is located in a Federal Nonrural Area and State Non-subsistence Use Area. Nearby communities, including Saxman and POW, have more hunting and fishing opportunities under Federal regulations. Council members who voted in favor of this proposal noted that these characteristics define rural communities in Southeast Alaska and noted that, based on these characteristics, Ketchikan is comparable to communities such as Sitka or Kodiak, and could reasonably be considered rural.

At the same time, there are significant differences between the lived experiences and subsistence reliance of Ketchikan as a whole and that of smaller, rural communities in Southeast Alaska. Ketchikan is one of the main hub communities in Southeast Alaska with a breadth of services. Ketchikan has more industries and more job opportunities than nearby rural communities like those on POW. Rural communities, such as those of POW, are often more geographically isolated, have smaller economies, and far fewer socioeconomic services. Employment opportunities remain more limited in these communities, and more residents live below the poverty level. Most rural residents of these communities invest much of their time, energy, and money into subsistence practices as a necessary means of livelihood. Resource sharing among and between residents of rural areas is also critical, both as a means of redistributing food resources and maintaining cultural traditions and social networks, which often include residents of Ketchikan. Council members who voted against this proposal noted that these traits are among the key elements of what constitutes “rural” in Southeast Alaska, and they highlighted that Ketchikan does not possess these qualities to the degree necessary to be considered rural.

OSM’s neutral position on this proposal recognizes the various, often conflicting data presented in this analysis, as well as the recent changes in the Nonrural Determination policy implemented in 2015 to give Regional Advisory Council’s input in the process greater weight to define region-specific conceptions of what it means to be a rural community/area. This is the first opportunity since the 2015 changes to the

Nonrural Determination policy for the Council to provide a recommendation to the Board on the rural or nonrural status of a Southeast Alaskan community.

OSM found the comments from discussions and testimonies provided at the October 2024 Southeast Council meeting to be insightful. Southeast Council members, public testifiers, and Tribal members all made valid arguments both in support and opposition to this proposal. OSM recognizes that this has been a hard process for all parties involved and that the Southeast Council's deliberations on this proposal were very difficult. OSM will continue to work on ways to improve this process. OSM recognizes that additional guidance on the criteria for defining rural and nonrural within different regions of Alaska could help Councils navigate these difficult determinations, particularly in cases where communities/areas may be considered borderline.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Southeast Alaska Subsistence Regional Advisory Council

Oppose NDP25-01

The Southeast Council opposed NDP25-01 by a vote of nine to four. The Council emphasized that they did not want tribes pitted against tribes, and they voiced support for Ketchikan Indian Community's request that Tribal citizens have a subsistence priority in their traditional lands and waters. However, many of the Council members who opposed the proposal noted that they did not believe that supporting rural status for the entire Ketchikan Area was the best way to address the issues being experienced by the Ketchikan Indian Community. These Council members also explained that Ketchikan possessed a degree of economic development, employment opportunities, social services, and access to commercial goods that made it unlike nearby rural communities. Some Council members also noted that Ketchikan was characterized by traits they considered non-rural, including a relatively high population density, substantial traffic, a large cruise tourism and charter fishing industry, and large, expensive housing developments for seasonal residents.

Some Council members described other characteristics they associate with rural communities, including the presence of Native communities who rely on traditional subsistence practices, being isolated, having limited road access, declining or limited economic opportunities, high poverty rates, reliance on barges for access to goods and materials, and vulnerable supply chains. In identifying these traits of rural areas, some Council members stated that Ketchikan was similar to rural hub communities like Kodiak and Sitka and should be compared to these larger rural communities rather than the ones on POW. One Council member voiced that the rural status of a community should be determined based on use of the land and traditions, rather than economic factors.

Throughout their discussion, competition for resources and impacts on resources in rural areas were the main reason provided for opposing rural status for Ketchikan residents. The Council expressed concern that the tools currently available in the FSMP to address resource competition and conservation concerns (i.e., harvest limit reductions, changes to harvest seasons, closures to NFQUs, and Section 804 user prioritizations) would be slow and ineffective approaches to ensuring that residents of nearby, small communities would not be negatively impacted if all residents of Ketchikan were to become FQSUs.

In Council discussions, it was noted that Title VIII of ANILCA does not provide a definition of "rural" and that the concept has evolved within the FSMP over time. The Council stated that more specific definitions or criteria of rural would better facilitate nonrural determination processes and Council decisions in the future. In their decision, the Council passed a motion to send a letter to the Board requesting that "rural" be redefined for the purposes of the FSMP to include all members of Federally recognized Tribes occupying their ancestral lands.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Ketchikan Indian Community (KIC) has a well-documented interest in the non-rural status of their tribal homelands. The Interagency Staff Committee acknowledges the extensive efforts made by the KIC to provide substantive and relevant information to the Federal Subsistence Board (Board) for consideration.

As with previous non-rural determinations made by the Board, consideration of a community's unique characteristics has been the main focus and provides the primary basis for their decisions. Potential impacts on subsistence resources and/or effects to other federally-qualified subsistence users that could result from revisions are outside the established procedures used by the Board, and are addressed through separate regulatory processes that are already in place (e.g. Section 804 prioritizations).

The Southeast Alaska Subsistence Regional Advisory Council (Council) discussed at length what the definition of 'rural' should be when describing whether or not a community such as Ketchikan should be considered rural because it exhibits both rural and non-rural characteristics. In addition, the Council expressed their concerns regarding the addition of Ketchikan residents to the pool of federally qualified subsistence users and the possible effects on subsistence resources. The Council's action was not based just on the consideration of Ketchikan's rural characteristics, which represents a significant departure from the approach the Board has used for prior determinations. A majority of the Council also indicated a desire to revise eligibility for the Federal subsistence priority so that Tribal affiliations could be considered, in addition to or in lieu of the geographically-based determinations currently used by the Federal Subsistence Management Program. Such a change would require a revision to ANILCA Title VIII through Congressional action, versus rule-making by the Secretaries, as suggested by some of the Council members.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

Neutral on NDP25-01

WRITTEN PUBLIC COMMENTS

None

APPENDIX A

Detailed Explanation on Proponent's Alternative Request for Ketchikan Indian Community Service Area

The proponents offer an alternative request that the federally recognized Ketchikan Indian Community Service Area be designated rural. The Federal Subsistence Board Policy on Nonrural Determinations states that communities or areas under consideration for rural status should be identified by boundaries and/or distinguishing landmarks, so that the Board can identify which Alaska residents would be affected by the change in nonrural status (FSB 2017). The Ketchikan Indian Community (KIC) constitution indicates that the KIC Service Area extends to “all lands, islands, waters, airspace, and surface and subsurface interests located within the geographic boundaries of the Ketchikan Gateway Borough but outside the municipal boundaries of the City of Saxman, notwithstanding the issuance of any patent or right of way” (KIC 2022). Geographically, this area is much larger than the current nonrural “Ketchikan Area,” but the vast majority of the population resides within the smaller Ketchikan Area. However, the proponents’ proposal states there are 3,300+ tribal citizens living on Revillagegado Island, suggesting that, should the KIC Service Area be designated rural, only these residents would be considered rural.

The City of Saxman is a geographically delineated and administratively distinct area within the Ketchikan Gateway Borough that is considered rural by the Federal Subsistence Board (see Regulatory History section). Available information suggests there are no means to geographically separate the KIC Service Area from the Ketchikan Gateway Borough. Currently, there are no provisions in ANILCA or in Federal regulations to designate only some residents of an area as rural. As such, this analysis does not consider the proponent’s alternative request.

APPENDIX B

Table B-1. Anticipated changes in residents’ access to resources if the Ketchikan Area were to be designated rural.

(*Resources considered are limited to those known to be harvested by Ketchikan residents. To determine anticipated changes in wildlife harvest opportunities, current Federal subsistence hunting regulations were compared to current State sport harvest limits, season dates, and closures in Game Management Units 1-4. To determine anticipated changes in fish and shellfish harvest opportunities, current Federal subsistence fishing regulations were compared to current State personal use harvest limits for the waters in and immediately surrounding Revillagigedo Island. If a fish or shellfish resource cannot be harvested under current State personal use regulations, then comparisons were made between Federal subsistence regulations and State sport fishing regulations (indicated by *). Comparisons were not made with State subsistence fishing regulations because Ketchikan is located in a State Non-subsistence Use Area, and Ketchikan residents are therefore limited to personal use or sport fishing regulations when harvesting in their immediate area. For anticipated changes in harvest opportunity, “Gain Access” indicates that Ketchikan residents are currently unable to harvest that resource but would be able to do so under Federal subsistence regulations if designated rural. “Increase” indicates that Ketchikan residents can currently harvest that resource but would be able to harvest greater amounts of the resource or harvest under extended seasons under Federal subsistence regulations if designated rural. “No Change” indicates there is no anticipated change in Ketchikan residents’ access or opportunity to harvest a particular resource if designated rural, because current Federal and State regulations provide the same harvest opportunities. “No Appreciable Change” indicates that Federal subsistence regulations provide increased harvest opportunity for that resource, but that there are no or limited practical harvest opportunities for that resource in the Ketchikan Area. “Outside FSMP jurisdiction” indicates that the resource is not within the jurisdiction of the Federal Subsistence Management Program, and no changes in harvest opportunity will occur regardless of whether Ketchikan is designated rural or nonrural).

Resource	Anticipated Change in Access	Notes
Deer	Increase	
Elk	Increase	
Black bear	No Change	
Brown bear	No Change	
Moose	Increase	
Goat	Increase	
Salmon	Increase	
Eulachon	Gain Access	Assuming restrictions on NFQUs continue
Shrimp	No Appreciable Change	Little to no Federal submerged lands
Dungeness Crab	No Appreciable Change	Little to no Federal submerged lands
Abalone	No Appreciable Change	Little to no Federal Submerged lands
Clams	No Change	
Herring and herring spawn not on kelp	Increase	Makhnati Federal public waters

Resource	Anticipated Change in Access	Notes
Herring spawn on kelp	Increase	Makhnati Federal public waters
Cutthroat and Rainbow Trout	Increase	
Steelhead	Increase	
Dolly Varden*	Increase	
Brook Trout*	Increase	
Halibut	Outside FSM Jurisdiction	
Seal	Outside FSM Jurisdiction	
Aquatic plants	Outside FSM Jurisdiction	
Birds/eggs	Outside FSM Jurisdiction	
Berries	Outside FSM Jurisdiction	