



City Manager  
334 Front Street  
Ketchikan, AK 99901

Phone (907) 228-5603  
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## TRANSMITTAL MEMORANDUM

TO: The Honorable Mayor and City Council

FROM: Delilah A. Walsh, City Manager

DATE: October 13, 2022

RE: **Consider Support of Ketchikan Indian Community's Application to the Federal Subsistence Board for Designation from Nonrural (Urban) to Rural in the Federal Subsistence Management Program for all Residents on Revillagigedo Island to Include the City of Ketchikan**

The Ketchikan Indian Community's Office of the President, remitted a letter to the Ketchikan City Council through Councilor Janalee Gage dated August 12, 2022 requesting the Council's support for its application to the Federal Subsistence Board to change the community of Ketchikan's designation in the Federal Subsistence Management Program from nonrural (urban) to rural. The Tribal Council passed resolution KIC 22-14 supporting this change in designation. Information related to this change is outlined in the remitted letter of request and supporting documents.

The motion detailed below was prepared at the request of Councilor Gage, who asked that it be placed before the City Council for consideration at its October 20, 2022 meeting. If adopted, the motion directs staff to ensure a change of designation from nonrural to rural does not impact any other federal dollars or awards for which the City of Ketchikan could be eligible and prepare a letter of support on behalf of the Council to be remitted to the Ketchikan Indian Community Tribal Government. The rationale for the application for the change of designation order is detailed in President Trixie Bennett's letter and attached 2023-2025 Fisheries Proposals.

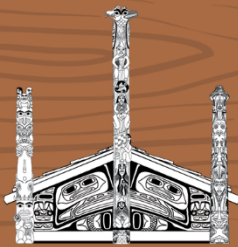
Tribal Council President Trixie Bennett or her designee will be attending the City Council meeting of October 20, 2022, in order to address any questions and/or concerns that Councilmembers may have.

A motion has been prepared for City Council consideration.

### **RECOMMENDATION**

It is recommended the City Council adopt the motion directing staff to determine that a change from a nonrural to rural designation is limited to the Federal Subsistence Management Program and if such, issue a letter of support on behalf of the Ketchikan City Council to the Ketchikan Indian Community Tribal Government for its application to the Federal Subsistence Board requesting the change in designation.

**Recommended Motion:** I move that the City Council direct staff to determine that a change from a nonrural to rural designation is limited to the Federal Subsistence Management Program and if such, issue a letter of support on behalf of the Ketchikan City Council to the Ketchikan Indian Community Tribal Government for its application to the Federal Subsistence Board requesting the change in designation.



**Ketchikan**  
**INDIAN COMMUNITY**

# OFFICE OF THE PRESIDENT

**From the Office of:** Trixie Bennett, President  
**Subject:** KIC Rural Status Proposal NDP25-01

**Date:** August 12, 2022  
**To:** Janalee Gage

Yak'ei yagiye and greetings Ms. Gage,

Ketchikan Indian Community's mission, as a sovereign nation, is to enhance and protect the interest and lives of its Tribal citizens by upholding our traditional way of life. This includes our rights to access traditional foods from our traditional lands in a manner that supports their self-sufficiency and provide food security for themselves and their families.

As president of Ketchikan Indian Community, I would like to formally notify you as a member of the Ketchikan City Council that we have submitted an application to the Federal Subsistence Board (FSB), the decision-making body for the Federal Subsistence Management Program, to change the community of Ketchikan's designation from nonrural (urban) to rural. We firmly believe in the rights of the citizens of our community to be able to sustain themselves and having this designation will help accomplish that goal. As a governing body, the Tribal Council passed resolution KIC 22-14 declaring Ketchikan to be rural (*see attached*), showing our sovereign support for this change in designation by the federal government.

However, we recognize that this change is not just a Tribal issue, rather a community issue. If this designation is changed, all residents on Revillaggeddo Island will be granted more access to fish and wildlife resources. The many reasons and facts related to this change in designation are outlined and addressed both in Resolution KIC 22-14 (see attached) and in Proposal NDP25-01 (page 36 of the 2023-25 Fisheries Proposal Book at <https://kictribe.info/FisheriesBook>).

Our Tribe would welcome the opportunity to be able to discuss our application with you. We look forward to sharing the many reasons we are seeking this change in status and discussing any questions or concerns you may have about this application or process. We hope that through this conversation you will agree that rural status would be beneficial for the community of Ketchikan and consider how you might work together with us toward that goal.

Thank you for your time and consideration on this important matter. The impact of this decision will have profound outcomes for all who live on our island—most crucially our Tribal citizens.

For Haa Kusteeyí, Our Way of Life,


  
Trixie Bennett  
President



Image Courtesy of  
Metropolitan Museum of  
Art, W. Carlyon image  
Algonquian Historical Society  
Collections, THS 67.12.14



F. W. CARLYON.





# Federal Subsistence Management Program 2023-2025 Fisheries Proposals



NDP25-01

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Ketchikan Indian Community  
2960 Tongass Avenue  
Ketchikan, AK 99901

President Contact: Trixie Bennett  
Email: [tbennett@council.kictribe.org](mailto:tbennett@council.kictribe.org) Phone: 907-228-9384

Staff Contact: Keenan Sanderson  
Email: [ksanderson@kictribe.org](mailto:ksanderson@kictribe.org) Phone: 907-228-9413

Proposal to the Federal Subsistence Board for Rural Designation of the Ketchikan Area and in the alternative to designate the Federally Recognized Ketchikan Indian Community Service Area as rural or as a subsistence area for all Alaska Natives who reside in that area.

1. The Ketchikan Indian Community Tribal Government respectfully proposes that the Federal Subsistence Board change the Board's previous designation of Ketchikan from nonrural to rural.
2. As a threshold matter the following are key factors or points of information not previously considered by the Board or that demonstrate that the information previously used has changed since the original determination was made and which is expanded upon further in our narrative and supported by the exhibits attached to this proposal:
  - a. The population for the Ketchikan area has declined in each of the last 3 decennial censuses. (see exhibit 1. United State Census-Ketchikan, AK.)

- b. Since the last determination of Ketchikan as “non-rural”, the FSB has reviewed and determined that the Organized Village of Saxman (OVS) – which falls wholly within the same community and population area as Ketchikan – as rural. KIC supports and agrees with the designation of OVS as rural and we contend that FSB’s determination of OVS as rural on March 10, 2016 adds support to, validates, and underscores KIC’s own proposal for rural status as access to community infrastructure, food vendors, healthcare, education etc. is identical to both OVS and KIC. (see exhibit 2. Saxman IRA-Federal Subsistence Board Restores Rural Community Status, Press release)
- c. New factors creating pressure on food security for our isolated community including the loss of one of three local primary food vendors, COVID-19, inflation in food prices, fuel prices, and the constriction of the supply chain discussed in more detail below.
- d. The continuing and expanding recognition of the Ketchikan area as rural by the federal government through many of its departments and agencies including but not limited to the Department of Agriculture, the Indian Health Service, the National Libraries of Medicine, the U.S. Census Bureau, the U.S. Department of Transportation, the U.S. Department of Treasury. The Department of Health and Human Services. (see exhibit 3. Definitions of rural by various Federal Agencies)
- e. The failure of the policies, practices, regulations, and designations of the federal government in general and FSB in particular to adequately protect and provide for the physical, economic, traditional, and cultural existence as contemplated by the subsistence authority granted to FSB and as enshrined in the Alaska National Interest Lands Conservation Act (ANILCA) discussed in more detail below.



3. Ketchikan lies on the traditional territory of the Tlingit Aani, specifically the lands of the Saanya Kwaan and Tanta Kwaan. Ketchikan has a long-standing history of


Indigenous occupation well before colonizers ever stepped foot in Alaska. The community of Ketchikan (which is a Tlingit word that roughly translates to the “Thundering wings of an Eagle.”), and its home on Revillagegado Island are essentially separated and isolated from the rest of the world. Ketchikan - a community that is comparable in size to both Sitka and Kodiak,



Alaska and smaller in population than Bethel, Alaska, all three of which enjoy FSB's rural designation - is heavily reliant on the natural resources in our immediate area including fish, wildlife, and terrestrial/aquatic plants. Whether indigenous or not, the residents of Ketchikan have strong ties to the food resources that can be gathered here. The area that we are proposing for rural status designation includes the entirety of Revillagegado Island, Pennock Island, Gravina Island, the southern portion of Cleveland Peninsula, and the surrounding waters in this area. This area is the footprint of both Ketchikan Indian Community and the Ketchikan Gateway Borough (see map and exhibit 4. Ketchikan Indian Community/Ketchikan Gateway Borough Jurisdiction map).

4. There are a number of factors that support the determination of rural status for the Ketchikan area:



- a. Ketchikan, which is comparable in population size and area characteristics to Sitka, AK, is completely inaccessible by the road system from the rest of the state of Alaska and the country as a whole. In terms of non-traditional foods that can be purchased through stores, our access is limited by the privately-owned barges that come to Ketchikan once a week (and which may be further limited based on whether conditions). We do not have large scale agricultural systems on our islands, and we do not raise livestock in our area. If anything happened to these barges we would not be able feed ourselves with food available for purchase in the stores for very long. This was apparent during the COVID-19 pandemic. The image in this section was a common occurrence for the past two years both due to COVID and more recent challenges with the national and international supply chain network. Some people are fortunate and were able to get their needs through the grocery store, but for those without reliable transportation they would often find the store bare by the time they got there, especially with meat and vegetable products. Theoretically supplies could be flown in, but at best it would be inefficient and no private entity has the obligation to make those efforts. This factor alone should be enough to seriously consider rural status designation.
- 
- b. Ketchikan suffered the loss of one of its only three principal food vendors known as Tatsuda's, (the other two are Safeway and Alaska & Proud) the grocery store here that was demolished in a rockslide in 2019. Not only was this store an important local business for the family that owned it and their employees, but Ketchikan has seen further tightening of its food access since that tragic event. The family decided to not rebuild, and Ketchikan has felt these shortages throughout the community.

- c. It seems that there are misconceptions on the public services that are available to Ketchikan. One of these misconceptions has to do with our access to healthcare services. Ketchikan has one small, rural, critical access hospital. This CAH has limited capacity to treat people. Often our people must be referred or transferred to Seattle, Anchorage, or Sitka for medical services. Again, access to these extended specialty or emergent services are only accessible via air flight as Ketchikan is not connected to any road system. The Ketchikan Indian Community Tribal Government does not believe that our tribal citizens should continue to be denied the ability to harvest their traditional foods to sustain their healthy culture merely due to the presence of some limited infrastructure in our community. Having grocery stores, sewers, and other facilities should not limit the ability to hunt, harvest, and gather the things that keep our people the healthy and allow them to retain important ties to their indigenous culture.
- d. The Ketchikan Indian Community Tribal Government, a Sovereign Alaska Native Tribe that is recognized by the United States Federal Government has formally acknowledged the Ketchikan area as a rural community through official action of its Tribal Council (see attached). The criteria used to make this resolution cited the high reliance on the traditional foods in our area, our inability to easily travel to other communities, and historical love for our own space in this community. This action by a Sovereign Tribe is entitled to the full faith and credit of the United States Government and should be should consequently be adopted by the FSB.
- e. While our current non-rural status does not differentiate between Indigenous vs. non-Indigenous rights, the United States federal government has the obligation through law to affirm that the subsistence needs of the Alaska native tribes are being met for all traditional foods. During the passage of the Alaska Native Settlement Claims Act (ANCSA) Congress stated that it recognized Native interests in subsistence resources and directed - in committee report – that the Secretary of the Interior and the State

of Alaska were “to take any action necessary to protect the subsistence needs of Alaska Natives.” The follow up to that commitment was the passage of the Alaska National Interest Lands Conservation Act (ANILCA) nearly ten years later. Specifically, section 801 of ANILCA invokes the historic federal authority over Native affairs to protect Native physical, economic, traditional, and cultural existence. Despite FSB’s interpretation of ANILCA as “racially neutral” statute, it is an important principle within ANILCA that subsistence protections are remedial in nature, and indeed based in federal law. Under the current non-rural/rural scheme those subsistence, physical, and cultural needs of Alaska Native’s in Ketchikan are not being met, and the tribal citizens of the Ketchikan Indian Community are the ones that are being disproportionately disadvantaged. The only resource that our tribal citizens have reasonable access to is Pacific halibut, however due to non-rural status regulations, we are forced to go miles out of town to attempt to harvest that resource. The further out our people have to go can result in a higher potential for injury and loss of life, something that both of our governments should be actively trying to prevent for any individual. Moreover, the most recent surge in fuel prices further challenges our citizens’ access to even this resource. The point we are trying to make here is that the way that things are managed in Ketchikan are not working in a way that is safe and equitable for all our traditional resources. The Federal Subsistence Board has the responsibility to the federally recognized tribes to provide opportunities to harvest these traditional foods in sufficient quantities. This responsibility has not been met and is currently not being met for our people.

It is for these and all the reasons set forth herein that KIC asks the FSB to consider a broader interpretation of its mandate by alternatively designating the service area of KIC as set forth in its federally recognized constitution, at Article V, as a subsistence area for all Alaska native’s residing within that area.



- f. The Ketchikan Indian Community holds its traditional foods in high regard as these foods are critical to our people's survival and promote a healthy mind and body. As a result, co-management of the resource between the Tribe, the federal government, and the state of Alaska is imperative for the sustainability of all the resources that we utilize. The Ketchikan Indian Community is already engaging in activities that are promoting conservation for various species around our community. Our most recent venture involves a population assessment of ooligan (eulachon, *Thaleichthys pacificus*) on the Joonax (Unuk) River. For years we have not had access to this traditional food in either state or federally managed waters ostensibly due to low abundances. The Tribe more recently partnered with the United States Forest Service and the Alaska Department of Fish and Game to do an eDNA project to get a better idea of abundance of this species. As a Tribe, we have also been working with the Alaska Board of Fisheries to open the harvest of ooligan in state managed waters so that our tribal citizens can reconnect with those resources. Recognizing Ketchikan as rural would mean access to the all-important harvest of ooligan on the Joonax in federally managed waters, which at least on this river is safer to harvest than state managed waters. There are other species of game and finfish that would become more accessible to our tribal citizens if Ketchikan's rural status was recognized by the FSB and as a tribe we are working to become full partners in the co-management of these traditional foods.



- g. In our traditional homelands, the indigenous people in this area have historically had high reliance on the Joonax (Unuk) River for a variety of resources. These include, but are not limited to, ooligan, king salmon, deer, moose, and seals. For



- generations indigenous harvesters would utilize this oasis as a multi-use gathering and hunting area. Due to the non-rural status designation that has been given to Ketchikan however, our tribal citizens have very limited access to the bountiful resources that the Joonax has to offer. KIC contends that stripping our tribal citizens of the option to harvest in this area contributes to the destruction of our culture and traditional ecological knowledge. This is something that the Ketchikan Indian Community Tribal Government wants to avoid at all costs. We cannot allow this to continue any longer.
- h. While not everyone in Ketchikan has an Indigenous background, the idea of trading and sharing is alive and well in our community. The thinking that resources will be depleted at higher rates, at least through harvesting, is not supported in any way. The great majority of harvesters in this area do not exercise their individual harvesting rights or access once their own families' needs have been met in any year. The point of this designation is to make sure that our loved ones are taken care of within our community. To reiterate, our community is small, off the road system, is completely reliant on private entities to supply non-traditional foods. Many of the people on this island are harvesters, and those harvesters take care of their parents and grandparents throughout the rest of Ketchikan. Within the KIC community our harvesters consider elders, disabled



people, youth, and any other tribal members who may not be able to harvest for themselves. We do not use harvesting opportunities for sport, we use them for our way of life, whether Indigenous or not. This culture, tradition, and practice is consistent with rural communities like our neighbors in Saxman, Metlakatla, and Prince of Wales.

5. Based on the character of our community, both Indigenous and non-Indigenous, the Federal Subsistence Board can verify that the community of Ketchikan meets the criteria needed to change our designation. KIC is respectfully requesting that the Federal Subsistence Board re-designate Ketchikan as rural. The fact the majority of households in Ketchikan rely on salmon, deer, halibut, beach growth, seafood, and terrestrial plants to sustain themselves and their families is reason enough to change this designation. Any disruption in the supply chain from the lower 48 will leave all citizens of Ketchikan, including the tribal citizens of the Ketchikan Indian Community, in a really bad position. In terms of processed westernized foods, we do not have any options other than the food the privately-owned barges operators supply us, which is alarming with the overhanging food security issues that we have been seeing for years coupled with the current restrictive federal regulations that are in place.
6. In summary, the Ketchikan Indian Community Tribal Government is proposing and requesting that the Federal Subsistence Board designate Ketchikan as rural. The Ketchikan Indian Tribal Government officially





recognizes the land of the Saanya Kwaan and Tanta Kwaan as rural by unanimous vote through resolution (see exhibit 5. KIC Resolution 22-14). As a federally recognized tribe, we have the sovereignty to make this decision and have identified our traditional territory as rural. At this stage we feel we have provided enough supporting information to move forward with this four-year process. The Ketchikan Indian Community represents a total 3300+ tribal citizens that live on Revillagegado Island. We are also confident that during this process you will find multiple stake-holders in who support this proposal who are not affiliated with the Ketchikan Indian Community. This is a community issue, not just a tribal issue. Following the years of COVID-19 and the more recent ravages of inflation it is becoming more apparent than ever that that potential for economic growth in Ketchikan is severely limited, which again underscores the importance of our peoples need to rely on the resources that are in the environment around them. As the governing body for our tribal citizens, we must overcome and oppose any condition which would result in forcing our people out of or away from their traditional homeland due to lack of opportunity to fish, hunt, and gather. Without changes in regulatory policy through the Federal Subsistence Board, we continue to run the risk of losing our people to larger communities. Please consider giving the citizens that reside in Ketchikan more access to the resources of the Tongass National Forest.

As a postscript to this proposal, here are quotes from some our tribal citizens on what it means to them to be subsistence users of the traditional foods of our lands and seas:

1. "Life."
2. "It means everything to me."
3. "Our culture."
4. "Family Tradition and passing this information onto the next generation. It means food stability in the winter time and pride in yourself knowing you are able to provide for your family or others if needed."
5. "Survival."
6. "Community."

7. "It means that my ancestors won the fight to keep our ancestral traditions alive and strong so that I too can provide for people.
8. "It means the place we belong."
9. "In this age of technology, it is being able to spend quality time with family and friends where there is no cell phone service while putting food on the table and our freezer."
10. "Self-sufficient. I can get my own food and medicine so I don't have to depend on going to the stores."

Respectfully submitted,



Trixie Bennett, President  
Ketchikan Indian Community

**EXHIBIT 1. UNITED STATE CENSUS, KETCHIKAN, AK.**



## 2022-2023 Fisheries Proposals

### Nonrural Determinations

 An official website of the United States government




#### QuickFacts

Kodiak Island Borough, Alaska; Bethel Census Area, Alaska; Ketchikan Gateway Borough, Alaska

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Table

All Topics ▾	Kodiak Island Borough, Alaska	Bethel Census Area, Alaska	Ketchikan Gateway Borough, Alaska
Population Estimates, July 1 2021, (V2021)	△ 12,787	△ 18,557	△ 13,754
 PEOPLE			
Population			
Population Estimates, July 1 2021, (V2021)	△ 12,787	△ 18,557	△ 13,754
Population estimates base, April 1, 2020, (V2021)	△ 13,101	△ 18,666	△ 13,948
Population, percent change - April 1, 2020 (estimates base) to July 1, 2021, (V2021)	△ -2.4%	△ -0.6%	△ -1.4%
Population, Census, April 1, 2020	13,101	18,666	13,948
Population, Census, April 1, 2010	13,592	17,013	13,477
Age and Sex			
Persons under 5 years, percent	△ 7.3%	△ 10.7%	△ 5.6%
Persons under 18 years, percent	△ 24.9%	△ 35.6%	△ 21.7%
Persons 65 years and over, percent	△ 11.4%	△ 7.9%	△ 16.5%
Female persons, percent	△ 46.9%	△ 48.4%	△ 48.9%
Race and Hispanic Origin			
White alone, percent	△ 55.0%	△ 10.3%	△ 67.4%
Black or African American alone, percent (a)	△ 1.3%	△ 1.0%	△ 1.1%
American Indian and Alaska Native alone, percent (a)	△ 13.1%	△ 83.9%	△ 13.9%
Asian alone, percent (a)	△ 21.9%	△ 1.0%	△ 8.2%
Native Hawaiian and Other Pacific Islander alone, percent (a)	△ 1.0%	△ 0.2%	△ 0.4%
Two or More Races, percent	△ 7.7%	△ 3.7%	△ 9.1%
Hispanic or Latino, percent (b)	△ 8.6%	△ 2.7%	△ 5.6%
White alone, not Hispanic or Latino, percent	△ 49.1%	△ 9.6%	△ 63.9%
Population Characteristics			
Veterans, 2016-2020	1,112	710	1,064
Foreign born persons, percent, 2016-2020	21.3%	2.1%	8.9%
Housing			
Housing units, July 1, 2019, (V2019)	5,501	6,034	6,458

**2022-2023 Fisheries Proposals**  
**Nonrural Determinations**

Owner-occupied housing unit rate, 2016-2020	49.7%	55.8%	63.9%
Median value of owner-occupied housing units, 2016-2020	\$295,100	\$88,700	\$299,500
Median selected monthly owner costs -with a mortgage, 2016-2020	\$1,847	\$1,518	\$1,872
Median selected monthly owner costs -without a mortgage, 2016-2020	\$718	\$394	\$601
Median gross rent, 2016-2020	\$1,412	\$1,368	\$1,188
Building permits, 2021	8	20	36
<b>Families &amp; Living Arrangements</b>			
Households, 2016-2020	4,231	4,499	5,299
Persons per household, 2016-2020	3.08	3.83	2.56
Living in same house 1 year ago, percent of persons age 1 year+, 2016-2020	81.8%	89.3%	85.4%
Language other than English spoken at home, percent of persons age 5 years+, 2016-2020	29.4%	61.3%	10.8%
<b>Computer and Internet Use</b>			
Households with a computer, percent, 2016-2020	90.9%	89.8%	93.3%
Households with a broadband Internet subscription, percent, 2016-2020	85.8%	73.4%	87.0%
<b>Education</b>			
High school graduate or higher, percent of persons age 25 years+, 2016-2020	89.6%	83.5%	93.9%
Bachelor's degree or higher, percent of persons age 25 years+, 2016-2020	29.8%	11.3%	25.5%
<b>Health</b>			
With a disability, under age 65 years, percent, 2016-2020	6.8%	7.9%	10.0%
Persons without health insurance, under age 65 years, percent	△ 18.2%	△ 16.8%	△ 13.5%
<b>Economy</b>			
In civilian labor force, total, percent of population age 16 years+, 2016-2020	65.7%	61.9%	67.0%
In civilian labor force, female, percent of population age 16 years+, 2016-2020	66.3%	62.3%	64.0%
Total accommodation and food services sales, 2012 (\$1,000) (c)	31,518	D	45,742
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	79,700	D	90,074
Total manufacturers shipments, 2012 (\$1,000) (c)	D	D	152,394
Total retail sales, 2012 (\$1,000) (c)	115,874	162,806	235,907
Total retail sales per capita, 2012 (c)	\$8,138	\$9,174	\$17,121
<b>Transportation</b>			
Mean travel time to work (minutes), workers age 16 years+, 2016-2020	11.2	7.2	13.9
<b>Income &amp; Poverty</b>			
Median household income (in 2020 dollars), 2016-2020	\$79,173	\$54,400	\$74,678

## 2022-2023 Fisheries Proposals

### Nonrural Determinations

Per capita income in past 12 months (in 2020 dollars), 2016-2020	\$32,495	\$21,392	\$38,343
Persons in poverty, percent	△ 7.5%	△ 25.3%	△ 8.3%
<b>BUSINESSES</b>			
<b>Businesses</b>			
Total employer establishments, 2020	445	220	589
Total employment, 2020	4,735	2,414	4,469
Total annual payroll, 2020 (\$1,000)	207,081	120,525	236,283
Total employment, percent change, 2019-2020	-6.4%	-0.3%	-1.9%
Total nonemployer establishments, 2018	1,485	667	1,375
All firms, 2012	1,919	1,121	1,978
Men-owned firms, 2012	1,090	840	888
Women-owned firms, 2012	481	187	527
Minority-owned firms, 2012	459	761	184
Nonminority-owned firms, 2012	1,337	299	1,697
Veteran-owned firms, 2012	188	173	176
Nonveteran-owned firms, 2012	1,616	889	1,511
<b>GEOGRAPHY</b>			
<b>Geography</b>			
Population per square mile, 2010	2.1	0.4	2.8
Land area in square miles, 2010	6,549.58	40,570.00	4,858.41
FIPS Code	02150	02050	02130



## 2022-2023 Fisheries Proposals

### Nonrural Determinations

#### [About datasets used in this table](#)

#### Value Notes

△ Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info ⓘ icon to the left of each row in TABLE view to learn about sampling error.

The vintage year (e.g., V2021) refers to the final year of the series (2020 thru 2021). Different vintage years of estimates are not comparable.

Users should exercise caution when comparing 2016-2020 ACS 5-year estimates to other ACS estimates. For more information, please visit the [2020 5-year ACS Comparison Guidance](#) page.

#### Fact Notes

- (a) Includes persons reporting only one race
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data
- (b) Hispanics may be of any race, so also are included in applicable race categories

#### Value Flags

- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or upper interval of an open ended distribution.
- F Fewer than 25 firms
- D Suppressed to avoid disclosure of confidential information
- N Data for this geographic area cannot be displayed because the number of sample cases is too small.
- FN Footnote on this item in place of data
- X Not applicable
- S Suppressed; does not meet publication standards
- NA Not available
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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**EXHIBIT 2. SAXMAN IRA-FEDERAL SUBSISTENCE BOARD  
RESTORES RURAL COMMUNITY STATUS, PRESS RELEASE**



#### FOR IMMEDIATE RELEASE

**CONTACT:** President Lee Wallace, Organized Village of Saxman  
 Phone: (907) 617-3128  
 Email: [iragovt@kpunet.net](mailto:iragovt@kpunet.net)

#### **FEDERAL SUBSISTENCE BOARD RESTORES RURAL COMMUNITY STATUS TO SAXMAN VILLAGE**

After ten years of arduous effort, the Organized Village of Saxman is filled with gratitude today at the recent announcement by the Federal Subsistence Board (FSB) to remove Saxman from the list of nonrural communities, thereby recognizing Saxman as a rural community. Under the Alaska National Interest Lands Conservation Act (ANILCA), rural community members enjoy a priority to harvest wild fish and game on federal public lands and waters. In 2006, however, the FSB wrongfully classified Saxman as a non-rural community, thereby denying its citizens the subsistence rights they had exercised since time immemorial.

“The importance of being recognized as a rural community is acute for Saxman and is crucial to survival. Subsistence is an essential cultural practice, a traditional worldview that is at the heart of surviving and thriving in Saxman,” said Lee Wallace, Tribal President of the Organized Village of Saxman. The preference for take of fish and wildlife resources for subsistence uses on federal public lands and waters in Alaska, when these resources are sometimes scarce, is profoundly important to a traditional culture that has lived and breathed this lifestyle for millennia. The affirmation of being classified as rural means the retention and sustenance of natural resource harvest will remain for generations into the future. “In Saxman, subsistence is a meaningful traditional cultural practice and a way of living and prospering in this world,” added President Wallace. “All those days, all those doubts of the last ten years, are behind the Tribe now. I praise and thank the Federal Subsistence Board for recognizing that Saxman is indeed rural, thank you to Alaska Federation of Natives, Sealaska Corporation, and Cape Fox Corporation for assisting, give praise to Dr. Daniel Monteith for his support, give praise to the Native American Rights Fund, who were a source of strength, give praise to the Tribes who bolstered Saxman up, give praise to the faithful tribal citizens and community members who gave moral support and testimony, and especially give praise to God the Creator, who indelibly oversees all good.”

## 2022-2023 Fisheries Proposals

### Nonrural Determinations



NATIVE AMERICAN RIGHTS FUND

#### FEDERAL SUBSISTENCE BOARD RESTORES RURAL COMMUNITY STATUS TO SAXMAN VILLAGE

March 11, 2016

Categories: Hunting and Fishing (Treaty Rights, Subsistence), Native Lands & Sacred Places (Land Back, Treaty Rights, Tribal Homelands, National Historic Places Protections)

Yesterday the Federal Subsistence Board (FSB) officially restored the rural status of Saxman, Alaska. The Alaska National Interest Lands Conservation Act (ANILCA) grants a harvest priority of fish and game on public lands, but this priority is only extended to "rural communities." In 2006, under political pressure from the State of Alaska, the FSB terminated Saxman's rural status and grouped the village with the larger city of Ketchikan. Represented by NARF, Saxman later filed suit to restore its rural status, but parties settled the case in favor of yesterday's administrative fix.



Our client, the Organized Village of Saxman, worked for over ten years to restore the community's rural status. We congratulate all of the tribal citizens and community members who worked for so long to restore their essential subsistence rights. The Organized Village of Saxman's press release discussing this important milestone is available [here](#).



Boulder CO (main) – 303-447-8760 Anchorage AK – 907-276-0680 Washington DC – 202-785-4166



**EXHIBIT 3. DEFINITIONS OF RURAL BY VARIOUS  
FEDERAL AGENCIES**

## 2022-2023 Fisheries Proposals

### Nonrural Determinations

#### Definitions of rural by various Federal Entities

##### Indian Health Service (Ketchikan IS rural)

Comprehensive primary health care and disease prevention services are provided through a network of hospitals, clinics, and health stations on or near Indian reservations. These facilities, which are managed by the IHS, Tribes, and Tribal organizations, are predominately located in rural and primary care settings. In addition, the IHS contracts with urban Indian organizations (UIOs) for health care services provided in some urban centers. The Indian health care system strives to provide comprehensive care through a network of IHS, Tribal, and urban health facilities and by purchasing health care services from non-IHS providers through the Purchased/Referred Care (PRC) program.

##### National Library of Medicine (Ketchikan IS rural)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1449333/>

Although many policymakers, researchers, and policy analysts would prefer one standardized, all-purpose definition, “rural” is a multifaceted concept about which there is no universal agreement. Defining rurality can be elusive and frequently relies on stereotypes and personal experiences. The term suggests pastoral landscapes, unique demographic structures and settlement patterns, isolation, low population density, extractive economic activities, and distinct sociocultural milieus. But these aspects of rurality fail to completely define “rural.” For example, rural cultures can exist in urban places. Only a small fraction of the rural population is involved in farming, and towns range from tens of thousands to a handful of residents. The proximity of rural areas to urban cores and services may range from a few miles to hundreds of miles. Generations of rural sociologists, demographers, and geographers have struggled with these concepts

##### US Census Bureau (Ketchikan IS rural)

<https://mtgis-portal.geo.census.gov/arcgis/apps/MapSeries/index.html?appid=49cd4bc9c8eb444ab51218c1d5001ef6#:~:text=The%20Census%20Bureau%20defines%20rural,rural%20based%20on%20this%20definition>

See Map

##### US Department of Transportation (Ketchikan is Rural)

This link shows various definitions for different grant programs, all of which Ketchikan would be eligible for rural funding.

<https://www.transportation.gov/rural/eligibility#:~:text=Located%20outside%20of%20a%20U.S.%20>

**2022-2023 Fisheries Proposals**  
**Nonrural Determinations**

Census%20designated%20urbanized%20area%20with, population%20of%20200%2C000%20or%20more

US Department of Treasury (Maybe)

By definition, any census tract that is not in a UA or UC is "rural." Each rural area, then, has less than 1,000 ppsm.

<https://gwipp.gwu.edu/sites/g/files/zaxdzs2181/f/downloads/Counting%20for%20Dollars%233%20Federal%20Funds%20for%20Rural%20America%2012-18.pdf>

US Department of Health and Human Services (Ketchikan IS rural)

Anything that is not in a metro area is considered rural. Metro meaning 50,000+ people

**EXHIBIT 4. KETCHIKAN INDIAN  
COMMUNITY/KETCHIKAN GATEWAY BOROUGH  
JURISDICTION MAP**





**EXHIBIT 5. KIC RESOLUTION 22-14**





RESOLUTION: KIC 22-14

TITLE: DECLARATION OF KETCHIKAN INDIAN COMMUNITY'S  
JURISDICTION AND TERRITORY AS RURAL.

WHEREAS, the Ketchikan Indian Community ("KIC" or the "Tribe"), is a federally recognized Tribal government organized under a Constitution and Bylaws (collectively, the "Constitution") ratified on October 18, 2017, and previously organized under a Constitution and Bylaws ratified on January 16, 1979, and previously organized under a Constitution and Bylaws ratified on January 27, 1940, in each instance pursuant to Section 16 of the Indian Reorganization Act

WHEREAS, the KIC Tribal Council (the "Tribal Council") is the governing body of the representative Tribal Government of the Tribe; and

WHEREAS, KIC is the Tribal Government entity that represents and serves over 6,300 Tribal Citizens in which KIC tribal citizens are of Alaskan Native descent and primarily of Tlingit, Haida, and Tsimshian origin; and

WHEREAS, the Indian relocation act, and Indian Removal policy encouraged native American people and Alaska natives to leave their ancestral homelands to assimilate to the general population of American in the name of the United States Manifest Destiny; and

WHEREAS, native Americans and Alaska Natives have experienced detrimental trauma, eradication and genocide from the United States laws, acts, policies and statehood and still to this day our native people are on a healing journey from those traumas; and

WHEREAS, native Americans and Alaska natives were forced into and to abide by a law called the Indian Reorganization act, in which this act was



created to keep native Americans off lands that the non-native people wish to settle; and

WHEREAS, the Federal Government and Alaska Statehood formed ANILCA, and ANCSA in an effort to address long standing Alaska native land claims and native rights to hunt, fish, and gather on Alaska lands and waters; and

WHEREAS, Alaska native peoples have never conveyed or conceded or officially transferred our homelands, and still hunt, fish, gather and govern the lands and waters as our native people have done since the beginning of time; and

WHEREAS, the Ketchikan Indian Community and its Tribal Citizens within the jurisdiction of Ketchikan, Alaska (Ketchikan Gateway Borough), is made up of (*defined in KIC's Amended and Restated Constitution and Bylaws October, 18<sup>th</sup>, 2017; ARTICLE II-TERRITORY AND JURISDICTION- SEC. (1) TERRITORY*; and

WHEREAS, ANILCA and federal subsistence rules were initiated and amended to protect the traditional subsistence and native fishing, hunting, and gathering rights for Alaska Natives and all residents of Alaska residing in "rural" designated areas; and

WHEREAS, The Federal Subsistence Board and the U.S. Fish and Wildlife Service designated the area within the Ketchikan Gateway Borough as "non-rural" despite its clear, historic, and well accepted status as a rural area. And, despite Ketchikan's designation as a rural area by multiple other federal departments including the USDA and the US Census Bureau; and

WHEREAS, the Federal Subsistence Board's current designation of Ketchikan as "non-rural" jeopardizes the subsistence needs of Native Alaskan's and other residents who live in our area; and

NOW THEREFORE BE IT RESOLVED,

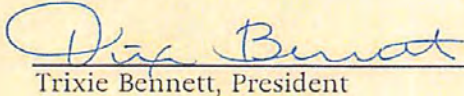
that as a Federally Recognized Tribe which was established under the Indian Reorganization Act, KIC hereby declares Ketchikan Indian Community's territory and jurisdiction a rural area; and




BE IT FURTHER RESOLVED, the Ketchikan Indian Community and as long as KIC's Tribal Citizens are in existence, KIC will continue to combat and defend our inherent rights to fish, hunt, gather and govern the lands and waters within KIC jurisdiction.

### CERTIFICATION

The foregoing resolution was adopted at a duly convened meeting of the Ketchikan Indian Community Tribal Council, assembled this 21st day of March, 2022, at 2960 Tongass, Ketchikan, Alaska 99901, by a vote of: 8 FOR and 0 AGAINST

 03/21/2022  
Trixie Bennett, President Date

ATTEST:  03/21/2022  
Judy Leask-Guthrie, Secretary Date

Effective: March 21, 2022 KIC 22-14			
Roll Call	Yes	No	Absent
BENNETT			
SKAN	X		
LEASK	X		
GUTHRIE	X		
EDWARDSON	X		
BURNS	X		
RUARO	X		
HAYNES	X		
JOHNSON	X		
WILLARD	X		
FLANERY	X		



