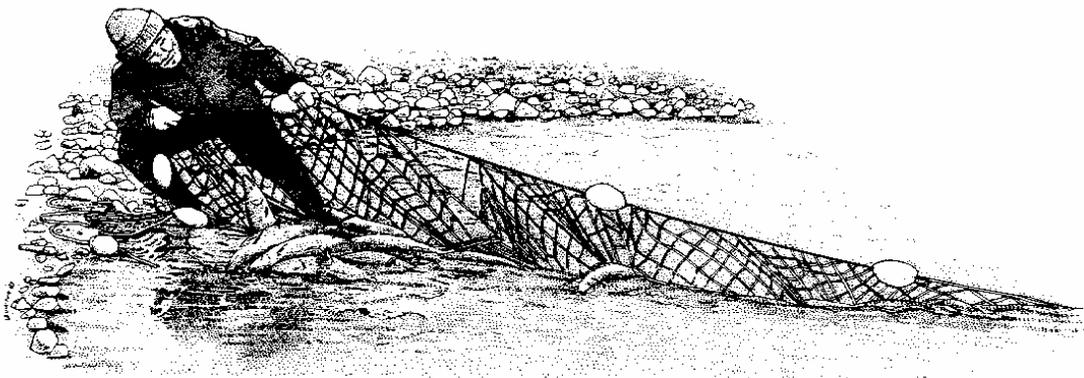


**DECENNIAL REVIEW OF RURAL DETERMINATIONS:  
SUMMARY OF COMMENTS AND RECOMMENDATIONS  
RECEIVED ON PROPOSED FURTHER ANALYSIS  
AND RELATED CONSIDERATIONS**



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## INTRODUCTION

The Federal Subsistence Board (Board) sought comments from July 28 through October 28, 2005, from Federal Subsistence Regional Advisory Councils (Councils) and the public on communities and areas proposed by the Board for further analysis in the decennial review of rural determinations. The Board sought comments on whether communities or areas should be added to, or removed from, the proposed list, and on the rural or nonrural status and characteristics of these communities. Councils may make recommendations to the Board, but recommendations from Councils on rural determinations are not subject to the deference afforded to Council recommendations on the taking of fish and wildlife, as required by Section 805c of the Alaska National Interest Lands Conservation Act (ANILCA).

Under Federal subsistence regulations:

- A community with a population below 2,500 is considered rural, unless it possesses significant characteristics of a nonrural nature or is considered to be socially and economically part of a nonrural area.
- A community with a population of more than 7,000 is considered nonrural unless it possesses significant characteristics of a rural nature.
- A community with a population above 2,500, but not more than 7,000 will be evaluated to determine its rural/nonrural status. The community characteristics considered in this evaluation may include, but are not limited to, the diversity and development of the local economy, the use of fish and wildlife, community infrastructure, transportation, and educational institutions.
- Communities that are economically, socially, and communally integrated will be grouped for evaluation purposes.

Regulations require that the Board periodically review rural determinations. Rural determinations are to be reviewed on a 10-year cycle, beginning with the publication of the year 2000 U.S. Census. This review makes use of population data from the year 2000 U.S. Census, but not changes that may have since occurred. Changes after 2000 will be captured in the next decennial review, using data from the 2010 U.S. Census.

Current rural/nonrural determinations, which date back to the start of the Federal Subsistence Management Program in 1990, coupled with year 2000 census information (OSM 2005a), indicates the following:

- Two communities or areas have populations greater than 7,000, but are considered rural: Kodiak (12,855), and Sitka (8,835). All other communities or areas with populations greater than 7,000 are considered nonrural.

- Three communities or areas have populations below 7,000, but are considered nonrural: Seward Area (5,044), Valdez (4,036), and Adak (316). All other communities or areas with populations below 7,000 are considered rural.

From January to July, 2005, an initial review of the rural/nonrural status of all Alaska communities was conducted by the Federal Subsistence Management Program, with an emphasis on what has changed since 1990. This review found that the status of most Alaska communities should remain unchanged. More information on the initial review can be found in OSM (2005a and 2005b).

The Board met on July 18, 2005, and proposed ten communities and areas for further analysis, as listed below. **Figures 1-10** provide maps of these ten communities and areas, showing census designated places.

- 1) **Kodiak**: Currently considered rural, Kodiak is proposed for further analysis because its population increased further above 7,000 between the 1990 and 2000 census.
- 2) **Sitka**: Currently considered rural, Sitka is proposed for further analysis because its population increased further above 7,000 between the 1990 and 2000 census.
- 3) **Adak**: Currently considered nonrural, Adak is proposed for further analysis because its population decreased and is now below the 2,500 threshold.

For the three following nonrural groupings, further analysis is proposed as to whether to exclude places, and examine the rural/nonrural status of those places independently:

- 4) **Fairbanks North Star Borough**: Whether to continue using the entire borough as the nonrural area, or separate some outlying areas.
- 5) **Kenai Area**: Evaluate whether to exclude Clam Gulch, and other similarly situated places.
- 6) **Seward Area**: Evaluate whether to exclude Moose Pass, and other similarly situated places.

For the three following nonrural groupings, further analysis is proposed as to whether to include additional places in the groupings, in which case those places would lose their current rural status:

- 7) **Wasilla Area**: Evaluate whether to include Willow, Point MacKenzie, and other similarly situated places.
- 8) **Homer Area**: Evaluate whether to include Fox River, Happy Valley, and other similarly situated places.

- 9) **Ketchikan Area**: Evaluate whether to include Saxman, and areas of further growth and development outside of the current nonrural boundary.

One potential new grouping is proposed for further analysis, as follows:

- 10) **Delta Junction, Big Delta, Deltana, and Fort Greely**: Evaluate whether some or all of these places, currently considered rural and not grouped, should be grouped and their rural/nonrural status evaluated collectively.

A two-step process is being used for this review. The comment period that concluded on October 28, 2005, is part of the first step, which culminates in December, when the Board is expected to approve a final list of communities for further analysis. During the second step of the process, in 2006, detailed analyses will be conducted on the Board-approved communities, and there will be additional opportunities for Council and public comment. The Board is expected to decide on any changes to the rural or nonrural status of those communities in December 2006.

This report provides a summary of written public comments and Council comments and recommendations, and a discussion of considerations in assigning further analysis, intended to assist the Board in its evaluation. Full text of written public comments, and transcripts of testimony presented at Council meetings, is part of the administrative record, and will be provided to Board members for their meeting in December 2005.

### **Current Rural Determinations**

The current status of rural determinations is that all communities and areas in Alaska are considered rural for the purposes of the Federal Subsistence Management Program, except for the following:

- Adak
- Fairbanks North Star Borough
- Homer Area – including Homer, Anchor Point, Kachemak City, and Fritz Creek
- Juneau Area – including Juneau, West Juneau, and Douglas
- Kenai Area – including Kenai, Soldotna, Sterling, Nikiski, Salamatof, Kalifornsky, Kasilof, and Clam Gulch
- 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
- Municipality of Anchorage
- Seward Area – including Seward and Moose Pass
- Valdez
- Wasilla Area – including Palmer, Wasilla, Sutton, Big Lake, Houston, and Bodenbergt Butte

## SUMMARY OF WRITTEN PUBLIC COMMENTS

The Board received comments from over 165 individuals and organizations and 15 resolutions from city, borough, and tribal governments and organizations.

Almost all commenters advocated for a rural designation for the communities of their concern. People perceive benefits from a rural designation, primarily in the priority for subsistence uses, and many commenters referred to ANILCA 804 situations either directly or indirectly.

Commenters hold that community characteristics are the critical factor, and that population size is either a lesser consideration or should not be a criteria at all. A number of people noted that community populations often fluctuate according to the season and the economy, and expressed concern about the effect of transient residents on a community's rural status.

The central theme of the comments is that Federal recognition and protection of the subsistence way of life is crucial. Loss of a rural designation would directly harm individuals' and communities' physical and spiritual well-being and would erode their cultures.

Written public comments received during the comment period are summarized here by primary subject area.

### Kodiak

Seven comments were received regarding Kodiak. Additionally, resolutions from the Ketchikan Indian Community, Natives of Larsen Bay, and Shoonaq' Tribe of Kodiak, requested that Kodiak retain its rural designation and that hearings be held in Kodiak.

Six commenters and the resolutions noted that many residents depend on subsistence foods for cultural, health, and economic reasons. The average household harvest of subsistence resources is 150 pounds per year. Loss of the rural designation would be a great blow to culture and a shock to the economy; the impact on people would be devastating. Subsistence is critical to cultural identity. The subsistence way of life has proven to enhance sustainability of fish and wildlife populations. All residents have demonstrated conservation of use of food harvested and good stewardship of the habitat.

Other comments included: Kodiak's population has grown 5.1 percent (635 people) but the rural characteristics of the area have not changed. Much of the modest population growth may be due to elders and their family members who move from small villages to town for better health care. Since the 2000 census, the population of the city of Kodiak

has fallen due to the decline of the fishing industry. Kodiak is the site of the largest Coast Guard base in the nation, approximately 3,000 enlisted, officers, and dependents. This significant number of Kodiak's population is temporary and does not practice subsistence. The economy is shaped by geographic isolation. Many goods, some of them essentials, must be brought by ship or air, which is costly. As in previous decades, employment is primarily seasonal. The rising cost of fuel and food increases the importance of subsistence harvesting of resources.

One commenter supports a nonrural determination for Kodiak based on the Board's criteria.

### Sitka

Fifty-three comments were received. Additionally, resolutions from the Central Council of Tlingit and Haida Indian Tribes of Alaska, the Ketchikan Indian Community, and the City and Borough of Sitka supported Sitka's rural status and requested that the Board hold public hearings in Sitka. One commenter supports a nonrural determination for Sitka based on the Board's criteria.

Commenters focused on the following issues and concerns. Sitka's tribal ancestors selected the community's location because of the bountiful natural resources. Sitka's local use area is expansive and does not overlap with subsistence users from other areas. Subsistence users are stewards of the land and strive to conserve the natural resources for posterity; the resources are well managed and are not threatened or endangered. Sitka always has and always will depend on food drawn from the surrounding resources.

The social and cultural traditions of hunting and gathering subsistence activities are well documented in studies and reports. Sitka residents use a broad range of fish and wildlife species. Sitka has the largest harbor system in Alaska; more than 1,500 boats ply the area waters for personal use and subsistence gathering throughout the year. Sitka's average wild food harvest consumption is approximately one pound per person per day (375 pounds per year). Dependence on deer is so great that every evening during hunting season a local store stays open to grind meat for hunters. Ninety-five percent of households consume fish caught under subsistence or personal use regulations. Collecting and sharing herring spawn on hemlock branches and harvesting black seaweed are treasured subsistence activities.

The practice of harvesting customary and traditional foods is of vital importance to the physical and spiritual health of Sitka's residents. The health benefits which stem from consumption of wild foods are unparalleled.

Equally important is the spiritual connection to subsistence hunting and fishing which is very strongly felt in Sitka. Subsistence is an age-old tradition in this community. Community members all share love of food gathering, as a family and with friends.

Families still teach children and newcomers how to subsistence hunt and fish and encourage the strong ties to land and water. This is the essence of being linked to self and community. Changing the rural status would change the face of the community.

Subsistence is an important component of the economy. Losing the rural status would put many residents out of work since subsistence is a way of life. Subsistence users actively contribute to Sitka's diversified economy. Sitka is a critically important community that shares its customary and traditional resources with many communities throughout Alaska.

The cost of living in Sitka is quite high and people need to supplement store-bought food with foods they can hunt, fish, and gather. Sitka has two grocery stores and one fuel dealer. Between 1980 and 2000, the average monthly wage decreased approximately 25 percent; since 2000, the average monthly wage has increased by only \$27. Sitka has a limited number of full-time jobs; most are seasonal. Many people are leaving the community due to the increased cost of living—losing the subsistence status would exacerbate the problem. In an (ANILCA) 804 situation, there are families in Sitka that would suffer without the rural designation, while the transient population would change residence to regain the rural status.

Sitka's population has only increased by 247 persons since 1990, an increase of less than three-tenths of one percent per year. More than a third of Sitka's residents are members of Sitka Tribe of Alaska. Sitka's subsistence use area is approximately 5,333 square miles located on several islands which makes Sitka's population density very low. There are a large number of summer businesses that hire people from outside the state who live in Sitka only a few months of the year.

Sitka is a remote community. It is the only community on the island and is accessible only by water and air. A ferry trip to the nearest urban area (Juneau) requires four days and costs \$200 for a round trip ticket.

### Ketchikan Area

Seventy-four comments were received regarding Ketchikan City and outlying communities other than Saxman. In addition, the Ketchikan Indian Community, the City of Ketchikan, the Greater Ketchikan Chamber of Commerce, Alaska Native Brotherhood and Alaska Native Sisterhood Camp #14, and the Ketchikan Gateway Borough submitted resolutions requesting a rural determination for Ketchikan and requesting a formal hearing in Ketchikan. Commenters focused on the following issues and concerns.

Population size should not be the primary criterion when determining a community's rural/nonrural status. Ketchikan possesses the characteristics of a rural community, similar to Craig and Wrangell, and should be classified as rural. Ketchikan is a remote community located on an island and is dominated by extensive land uses such as forestry

and by large open undeveloped spaces.

Tourism is Ketchikan's only viable industry and it is very seasonal; unemployment is high during the off-season. Local timber and fishing industries are a fraction of what they were and jobs in town are seasonal, low paying, and offer no benefits. Many residents of the Ketchikan Area live off the land and must hunt and fish to provide for their families. Subsistence harvest methods and limits make more economical use of gas and time.

The subsistence way of life has proven that it enhances sustainability of fish and wildlife populations. All residents of the community have demonstrated conservation of use of food harvested and good stewardship of the habitat. A rural designation would insure the subsistence way of life from being over-harvested or wiped out by outside interests.

Resource gathering activities are essential for the spiritual, emotional, and physical well-being of people. There are medicinal qualities to subsistence foods and people become ill without them. Residents of the Ketchikan Area must be able to continue to live the lives they choose by gathering, preparing, and sharing subsistence foods and enjoying the quality of life this provides.

The Waterfall community, 20 miles north of Ketchikan, should retain its rural status. The area does not have any grocery stores, schools, road maintenance, or other services, and many families in the area rely on subsistence resources. Other outlying areas on the road system, such as North and South Tongass, are rural as well.

Several commenters noted that there is no reason for Ketchikan and Saxman to have different rural determinations; everyone is in the same boat. The split status causes division and bad feelings between neighbors.

The Hydaburg Cooperative Association wrote in opposition to a rural designation for Ketchikan. The letter stated that HCA is obligated to protect their customary and traditional areas. A rural designation for Ketchikan would put added stress on HCA's subsistence foods which are already insufficient.

One commenter supports a nonrural determination for Ketchikan and the surrounding communities based on the Board's criteria.

### Saxman

Thirty-two comments were received regarding Saxman. There are also resolutions from the Ketchikan Indian Community and the City of Saxman in support of retaining Saxman's rural status.

Commenters focused on the following issues and concerns. Saxman is not socially or

economically integrated into the City of Ketchikan or the borough. Saxman was, is, and always will be a place apart. Saxman has its own municipal and tribal governments and social infrastructure. Health services are provided by an island-wide Indian Health Service clinic; other tribal services from Ketchikan Indian Community are denied to Saxman residents. Saxman does not have police protection from Ketchikan Police Department, but is under the State Troopers jurisdiction. The communities share electric and telephone utilities; they share a post office because the U.S. Postal Service closed the one in Saxman.

Sharing the same high school does not prove that the communities are socially integrated. Saxman students have attended school in Ketchikan since the Bureau of Indian Affairs closed its school in the 1940s. However, Saxman students have not integrated with the expectations of the common high school and have withdrawn for a variety of reasons; the drop out rate in 1999 and 2004 was approximately 80 percent. No tribal Saxman community members are employed in teaching or administrative positions or sit on the district school board.

Saxman began as a Native village and is still; it is more reliant than its neighbors on the traditional Native non-cash economy. The criterion of 30 percent of working people commuting to a neighboring community ignores the larger 70 percent who are not fortunate and have only seasonal work. Tribal members fortunate enough to have employment should not have to forfeit their ability to participate in subsistence activities because they commute to their employment. They still cling to a cultural and spiritual use of food from the land and water.

People of Saxman need subsistence to survive as a people; traditional harvest is a cultural and spiritual matter. Subsistence foods are healthier to eat because they do not contain hormones and antibiotics. The subsistence way of life has proven to enhance sustainability of fish and wildlife populations. All residents have demonstrated conservation of use of food harvested and good stewardship of the habitat. Refer to documentation of the Saxman subsistence hearing of February 26, 2001 in the published document "Gravina Island Timber Sale, Final Environmental Impact Statement, Volume II: Appendices" dated July 2004, pages C-16 through C-28.

A few Ketchikan residents, while commenting primarily on their community's status, noted that they believe Saxman was deemed rural because it is a Native community. These commenters stated that either the whole area should be deemed rural, or that Saxman should be included in the Ketchikan Nonrural Area. One other commenter supports a nonrural determination for Saxman based on the Board's criteria.

### Seward Area

Four comments were received from residents of Moose Pass. All stated that Moose Pass should not be included in the Seward Nonrural Area. Moose Pass is a rural community

with community characteristics and infrastructure similar to Cooper Landing. While many Moose Pass residents work in Seward, many more do not; most Moose Pass residents are self-employed or work for the railroad or Forest Service. Moose Pass has a K-8 school which a majority of the local children attend. Major purchasing and socializing is in Kenai or Anchorage, not Seward.

#### Ninilchik/Kenai Area/Homer Area

One comment was received which stated that Ninilchik should retain its rural status, that Clam Gulch should be excluded from the Kenai Area, and that Happy Valley should not be included in the Homer Area. Happy Valley, population 489, is 30 miles from Homer, and its residents generally send their children to school in Ninilchik.

#### Adak

One comment was received regarding Adak. The commenter stated that since the Department of Defense closed the Naval base and transferred ownership to the Aleut Corporation the population has dropped from 9,500 to between 70 and 100 year-round residents. The community characteristics have also changed dramatically: Adak was a military base but is now a fishing community that relies on subsistence resources. The people request that the Board designate Adak as a rural community.

#### Delta Junction Vicinity

One comment was received regarding the vicinity of Delta Junction, asking that Healy Lake not be grouped with any other community for analysis of rural status. Healy Lake is culturally, economically, and traditionally different from other communities in the greater Delta Junction area.

#### General Comments

The Alaska Federation of Natives submitted a resolution which requests the Board to maintain the rural status of those communities currently under review and to hold public hearings in the ten communities and areas proposed for further analysis.

The Angoon Community Association IRA Council submitted a resolution which declares that defining rural preference is a community issue rather than a statewide issue and should be addressed by representatives appointed by tribal governments that existed before the Tlingit & Haida Central Council. In an accompanying proposal, the Angoon Community Association stated that hearings should be held in subsistence communities and that, out of these hearings, patterns of use and use areas will emerge.

United Fishermen of Alaska encourages the Board to carefully review the characteristics of each of the listed communities and areas, noting that granting rural status to larger communities has the potential to impact other users.

An individual commenter requested the Board to uniformly apply concrete standards when determining whether communities are rural and recommended that the only criteria should be population threshold, community proximity, and common road access.

## **SUMMARY OF COMMENTS AND RECOMMENDATIONS FROM COUNCILS**

Five of the ten Councils had comments and recommendations for the Board on the communities proposed for further analysis in the review of rural determinations. This summary is based upon transcripts of the September-October 2005 Council meetings, and from written Council recommendations.

The **Southeast Alaska Council**, after hearing public testimony from three persons and the reading of a written resolution, submitted a letter to the Board with the following recommendations:

1. Add Ketchikan to the list of communities subject to further analysis. The Council supports Ketchikan's request for a rural determination hearing to be held in the community. The Council considered Ketchikan's history, economy, and other community characteristics and concluded that Ketchikan may have more rural characteristics now than it had when ANILCA was passed.
2. Remove Saxman from the list of communities requiring further analysis. The Council requests that a rural determination hearing be held in Saxman to facilitate community understanding of the issue and participation in the decision making process. The Council considered Saxman's history, economy, and other community characteristics. From its beginning, Saxman has had a community identity and government separate from Ketchikan.
3. Remove Sitka from the list of communities to receive further analysis. The Council requests that a rural determination hearing be held in Sitka to facilitate community understanding of the issue and participation in the decision making process. Sitka's population was 7,803 in 1980, yet due to its rural characteristics and reliance on subsistence resources, it has been classified as rural by both the State and Federal boards.
4. That the Federal Subsistence Management Program provide staff assistance to these communities to identify and obtain data relevant to the rural determination decisions and to provide further technical assistance to the communities to make use of the data provided.

The **Southcentral Alaska Council** recommendation endorses further analysis of the communities listed as proposed by the Board.

The **Kodiak/Aleutians Council** heard public testimony from seven persons and formed the following two recommendations for the Board to consider:

1. The Council recommends withdrawal of Kodiak from the list for further analysis. The actual population does not meet the threshold for consideration; the present population is 300 persons fewer than when the census was taken. The Council also noted that a change in the numbers of people or other change in demographics does not change the moral need for subsistence for Kodiak.
2. The Council recommends that, because of the recent tremendous changes in population, Adak be given rural status without further study.

The **Eastern Interior Alaska Council** formed three recommendations for the Board to consider, as follows:

1. Continue to treat the Fairbanks North Star Borough as a whole.
2. Conduct an analysis of Big Delta, Delta Junction, and Fort Greeley as a grouping.
3. Deltana, Healy Lake, Dry Creek, Dot Lake Village and Dot Lake are all rural communities with definite rural characteristics, and should not be analyzed in conjunction with Big Delta, Delta Junction, and Fort Greeley.

The **North Slope Council** recommends that Prudhoe Bay be analyzed as part of the rural determinations review process and further recommends a nonrural determination. Prudhoe Bay is an industrial complex which does not have a school, store, or family homes and should not be considered rural. A few people live there year round, but virtually all of the people there are oil company employees who work at Prudhoe Bay but reside elsewhere. The Council noted that some outsiders claim residency in one of the villages during the summer because of the benefits associated with that claim.

Five of the ten Councils had no comment or recommendation for the Board at this time, those being the **Bristol Bay, Yukon-Kuskokwim Delta, Western Interior Alaska, Seward Peninsula, and Northwest Arctic Councils.**

## CONSIDERATIONS IN ASSIGNING FURTHER ANALYSIS

Of primary importance at this point in the review process is the question of whether communities or areas should be added to, or removed from, the Board-proposed list of communities for further analysis. Information provided on the status and characteristics

of communities may also contribute to the subsequent analysis of those communities that are approved by the Board for further analysis.

Advancing a community or area to the second step in the process, and conducting the further analysis, does not mean that a change in status will occur. It only means that a more thorough examination is thought necessary before deciding upon how to address grouping or rural/nonrural classification. To withhold a community or area from the final list means that no further information is needed to propose, subject to the rulemaking process, that a community's status should remain unchanged.

The purpose of this report is to assist the Board in its evaluation, not to intercede between the Board and the sources of comments and recommendations. The Board will ultimately evaluate the body of comments and recommendations received and determine whether there is sufficient justification to add communities or areas to, or remove them from, the list proposed for further analysis.

Many comments and recommendations advocated for communities to be removed from further analysis, most notably that Sitka, Kodiak, and Saxman should remain rural in status without further review. Sitka and Kodiak are proposed for further analysis of their rural/nonrural status. The situation for Saxman is somewhat different, in that it is the potential grouping of Saxman with the nonrural Ketchikan Area that is the intent of further analysis. If so grouped, the effect would be a change in status to nonrural. Each of these will be addressed separately. Population data referenced here for these and other communities are from the U.S. Census, as reported by OSM (2005a).

Sitka was proposed for further analysis because its population increased further above 7,000 between the 1990 and 2000 census, which was a criteria for considering further analysis in the Board-approved methodology for this review. The population of Sitka increased by 247 people (3%), from 8,588 to 8,835, between 1990 and 2000, making it 26% above the 7,000 threshold. The Board will need to consider the population size of Sitka relative to the 7,000 threshold, and the information received on community characteristics, summarized earlier in this report, in deciding upon whether to assign Sitka for further analysis or find that it should retain its status quo rural determination for the proposed rule stage without further evaluation.

Kodiak was proposed for further analysis because it also increased in population further above 7,000 between the 1990 and 2000 census. The population of the Kodiak area increased by 625 people (5%), from 12,230 to 12,855, between 1990 and 2000. The Kodiak area in 2000 was 84% above the 7,000 threshold, and 46% larger than Sitka. The Board will need to consider the population size of the Kodiak area relative to the 7,000 threshold, and the information received on community characteristics, summarized earlier in this report, in deciding upon whether to assign Kodiak for further analysis or find that it should retain its status quo rural determination for the proposed rule stage without further evaluation. Taken in isolation from the surrounding area, Kodiak City had a population of 6,334 in 2000, which was down 31 people from the 1990 level of 6,365.

However, as was previously noted, Federal regulations require that “*Communities or areas which are economically, socially, and communally integrated shall be considered in the aggregate.*” The proposed further analysis would address how to best define the Kodiak area, and the population data and community characteristics associated with that area.

Saxman, currently considered separate from the Ketchikan Area, had a population of 431 in 2000, up by 62 people (17%) from the 1990 level of 369. However, it is not population size or growth of Saxman that led to it being proposed for further analysis. Rather, it is its potential grouping with the Ketchikan Area, by which it is surrounded. Saxman is in immediate proximity and connected by road to the Ketchikan Area, and shares a common high school attendance area. These are two of the three criteria identified by the Board for evaluation of the potential grouping of communities in this decennial review. The third criteria, commuting levels of workers between communities, has yet to be analyzed, pending availability of data from the research group that compiles such statistics from U.S. Census data. The Board will need to consider the merit of conducting further analysis of the potential grouping of Saxman with the nonrural Ketchikan Area, or deciding, based on the information received and summarized earlier in this report, that Saxman should retain its status quo separation from the Ketchikan Area and rural status for the proposed rule stage without further evaluation. On the one hand, much of the information in support of status quo for Saxman focuses on community characteristics in contrast to Ketchikan, rather than the specific grouping criteria being employed in this review. On the other hand, the regulations are silent on the specifics of how the integration of communities is to be considered; the grouping criteria being used are a Board-approved approach, not a regulation.

One Council recommended that Adak, currently considered nonrural, be removed from the list for further analysis, on the rationale that the information now available is sufficient to justify a change in status to rural. The population of Adak has dropped to an order of magnitude below the presumptive level for rural status (from 4,633 in 1990 to 316 in 2000), and it is geographically isolated. However, the review process established by the Board includes a further analysis step prior to proposing a change in status. Such a further analysis, even if brief, would contribute to the proposed rule, should the Board determine that a change may be warranted. Therefore, the Board may want to retain Adak on the list for further analysis, even if it concurs with the view of the Council on the likely outcome.

Two additions to the list of communities proposed for further analysis rise from the comments and recommendations. These are to add analysis of nonrural/rural status for Ketchikan, and for Prudhoe Bay.

Ketchikan was one of the communities named in the legislative history of ANILCA as an example of a nonrural place in Alaska. The population of the Ketchikan Area increased by 180 people (1%), from 13,459 to 13,639, between 1990 and 2000, making it 95% above the 7,000 threshold. The Ketchikan Area is proposed by the Board for further

analysis, but not for examination of its nonrural status. On the contrary, the Board has proposed that the further analysis examine whether to include Saxman, and areas of further growth and development outside of the current nonrural boundary, within the Ketchikan Area. If so aggregated, the population of the Ketchikan Area would be over 14,000, which is double the 7,000 threshold. The Board will need to consider the population size of the Ketchikan Area relative to the 7,000 threshold, and the information received on community characteristics, summarized earlier in this report, in deciding upon whether to assign Ketchikan for further analysis of its nonrural/rural status, or find that it should retain its status quo nonrural determination for the proposed rule stage without further evaluation. Taken in isolation from the surrounding area, Ketchikan City had a population of 7,922 in 2000, which was down 341 people from the 1990 level of 8,263. However, as was previously noted, Federal regulations require that areas be considered in the aggregate when found to be economically, socially, and communally integrated, and Ketchikan City has therefore not been considered in isolation.

One Council recommended that Prudhoe Bay, currently considered rural, be added to the list for further analysis of its rural/nonrural status, and provided information on the nonrural characteristics of Prudhoe Bay. Population of Prudhoe Bay in 2000 was 5 people, down from 47 in 1990. Although the very small population of Prudhoe Bay would typically be indicative of a rural community, the characteristics of an industrial complex associated with oil drilling and transportation may warrant further staff analysis and Board consideration.

A number of comments and recommendations included a request for public hearings in potentially affected communities so that the Board could receive direct testimony in those places. Public comment periods, public meetings of the Board in Anchorage, and Council meetings in some of the potentially affected communities are features of the ongoing review process. Whether, and when, to hold the additionally requested hearings would be at the discretion of the Board.

### **LITERATURE CITED**

OSM (Office of Subsistence Management). 2005a. Decennial review of rural determinations: A report to the Federal Subsistence Board on initial comments received and considerations for further analysis. July 15, 2005. Anchorage.

OSM (Office of Subsistence Management). 2005b. Decennial review of rural determinations: Public comments received during the January 31-April 1, 2005 comment period. June 22, 2005. Anchorage.

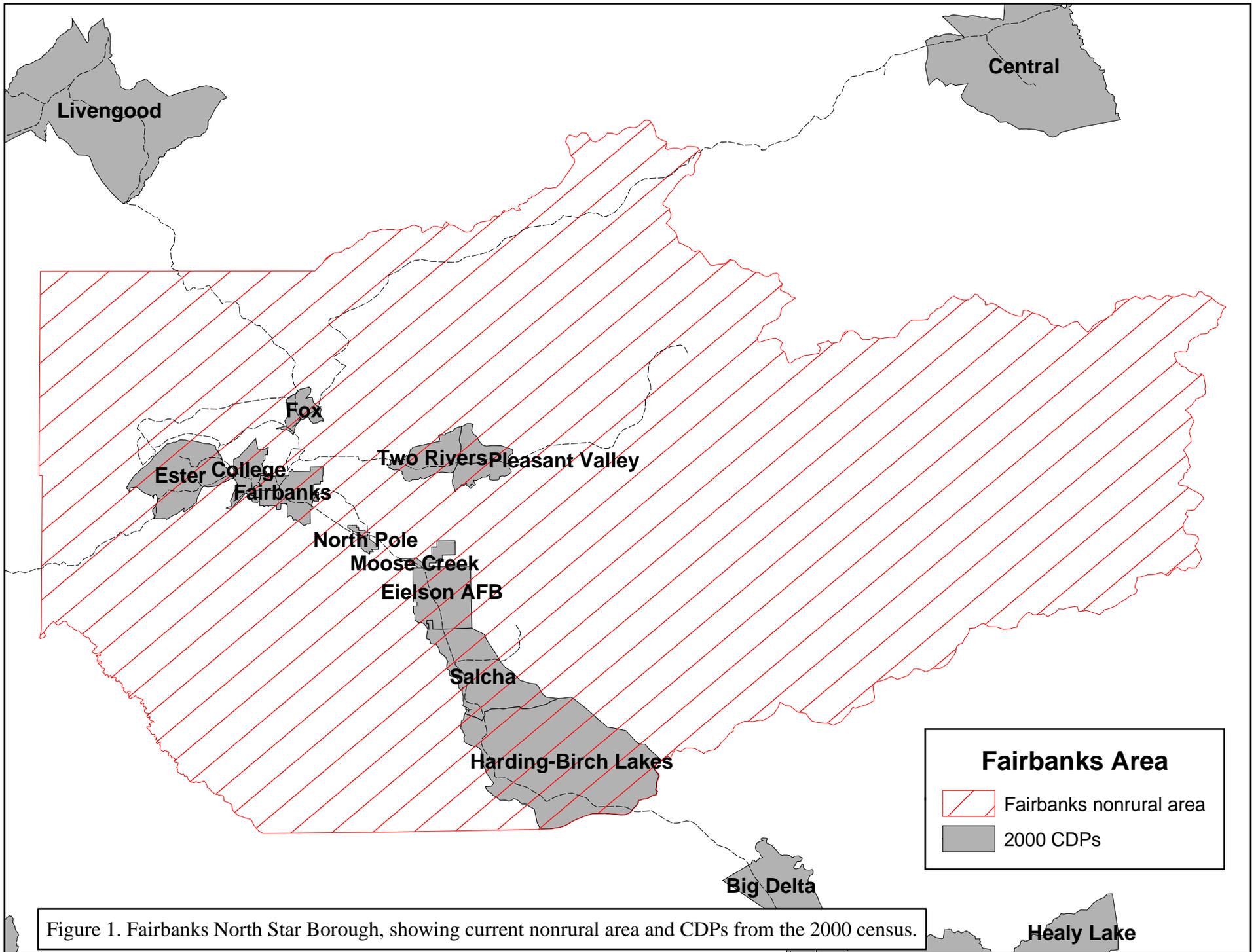


Figure 1. Fairbanks North Star Borough, showing current nonrural area and CDPs from the 2000 census.

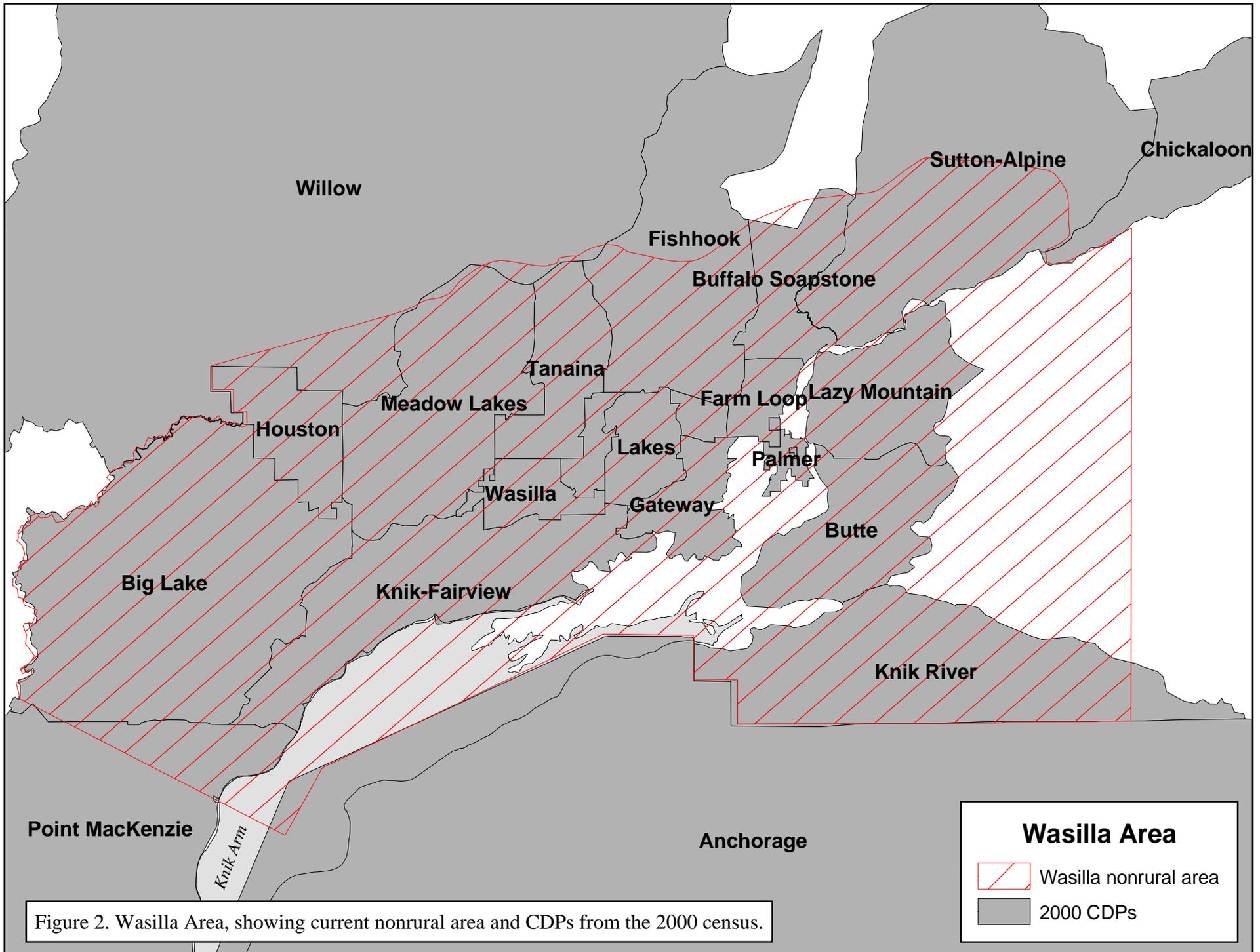


Figure 3. Kenai Area, showing current nonrural area and CDPs from the 2000 census.

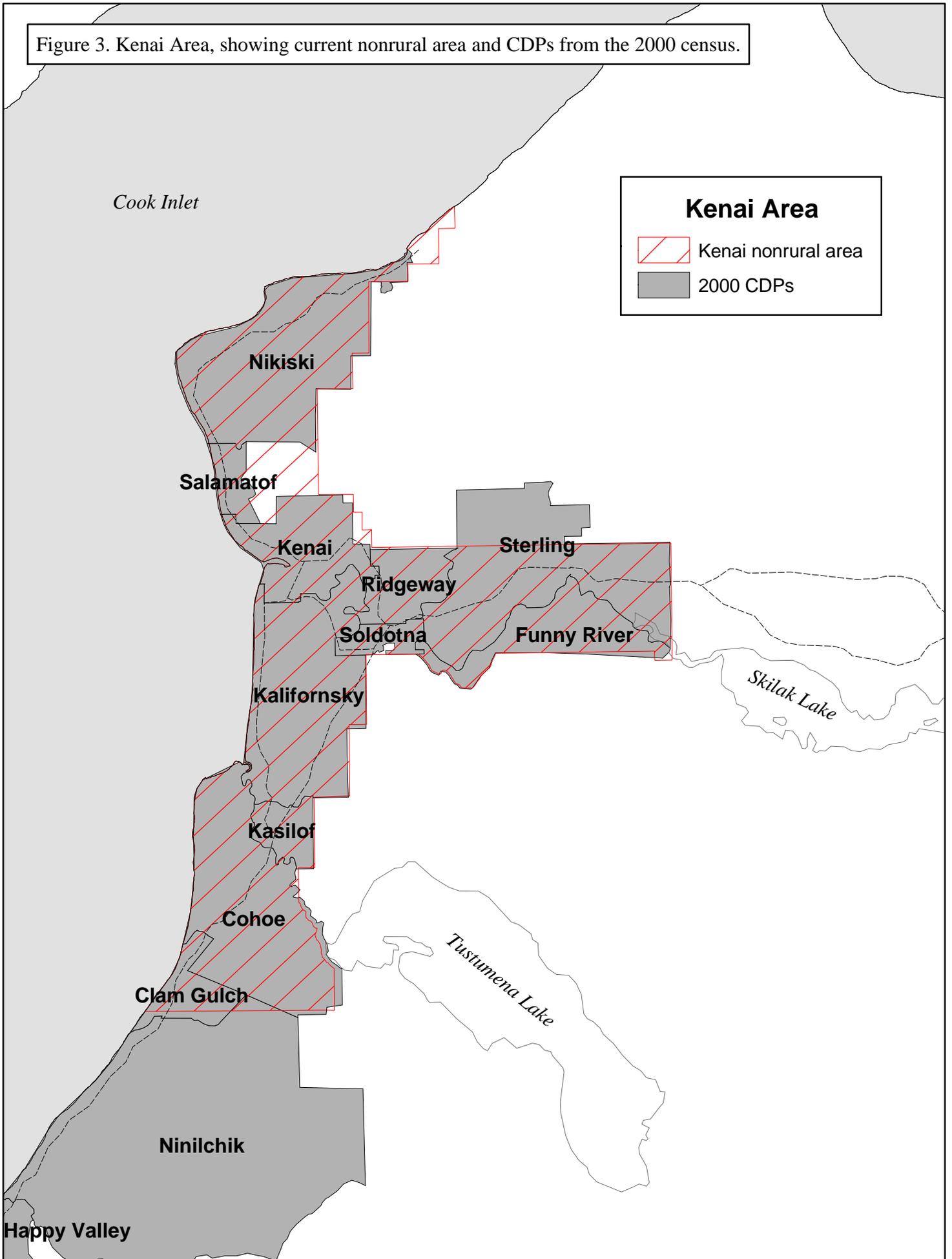




Figure 4. Homer Area, showing current nonrural area and CDPs from the 2000 census.

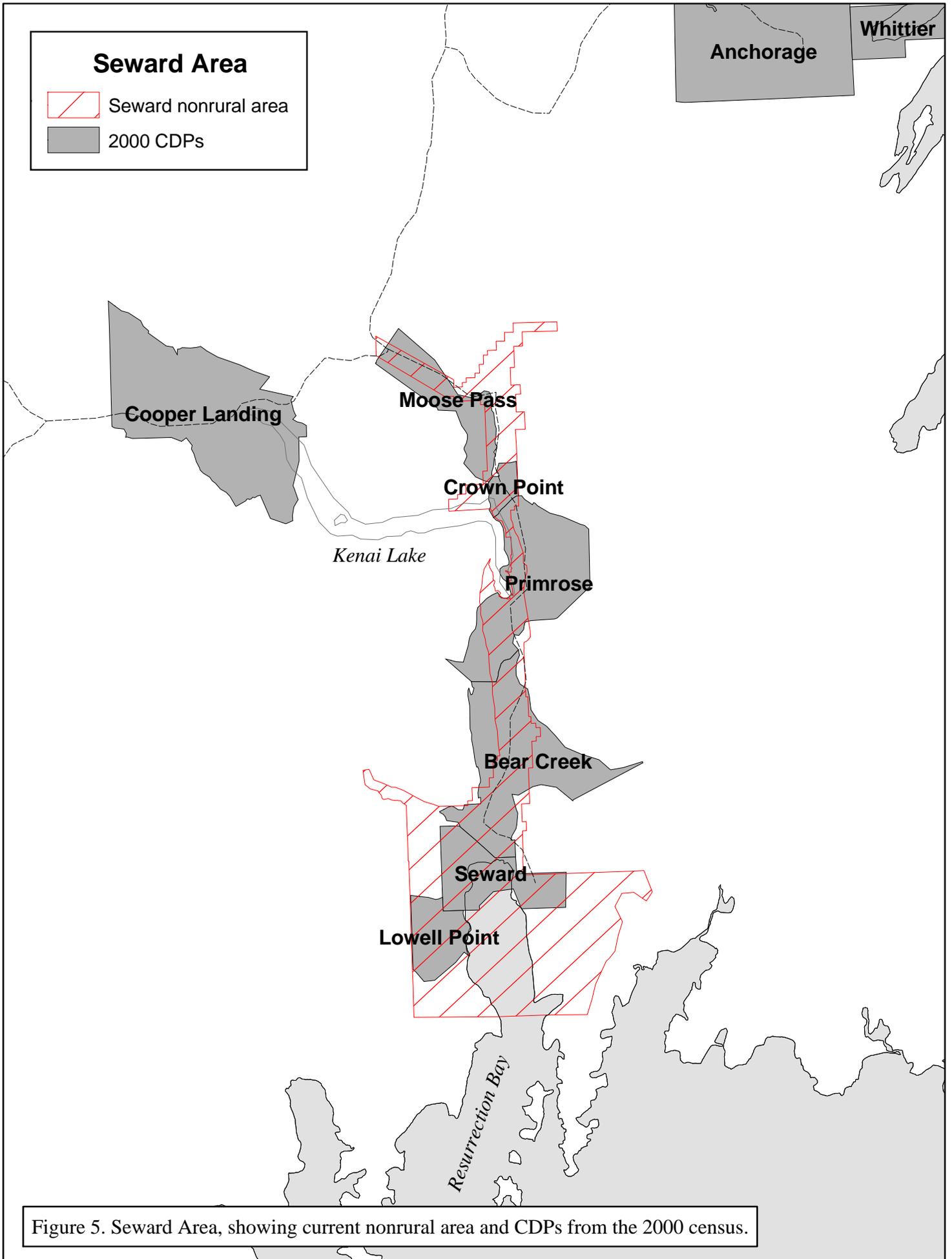
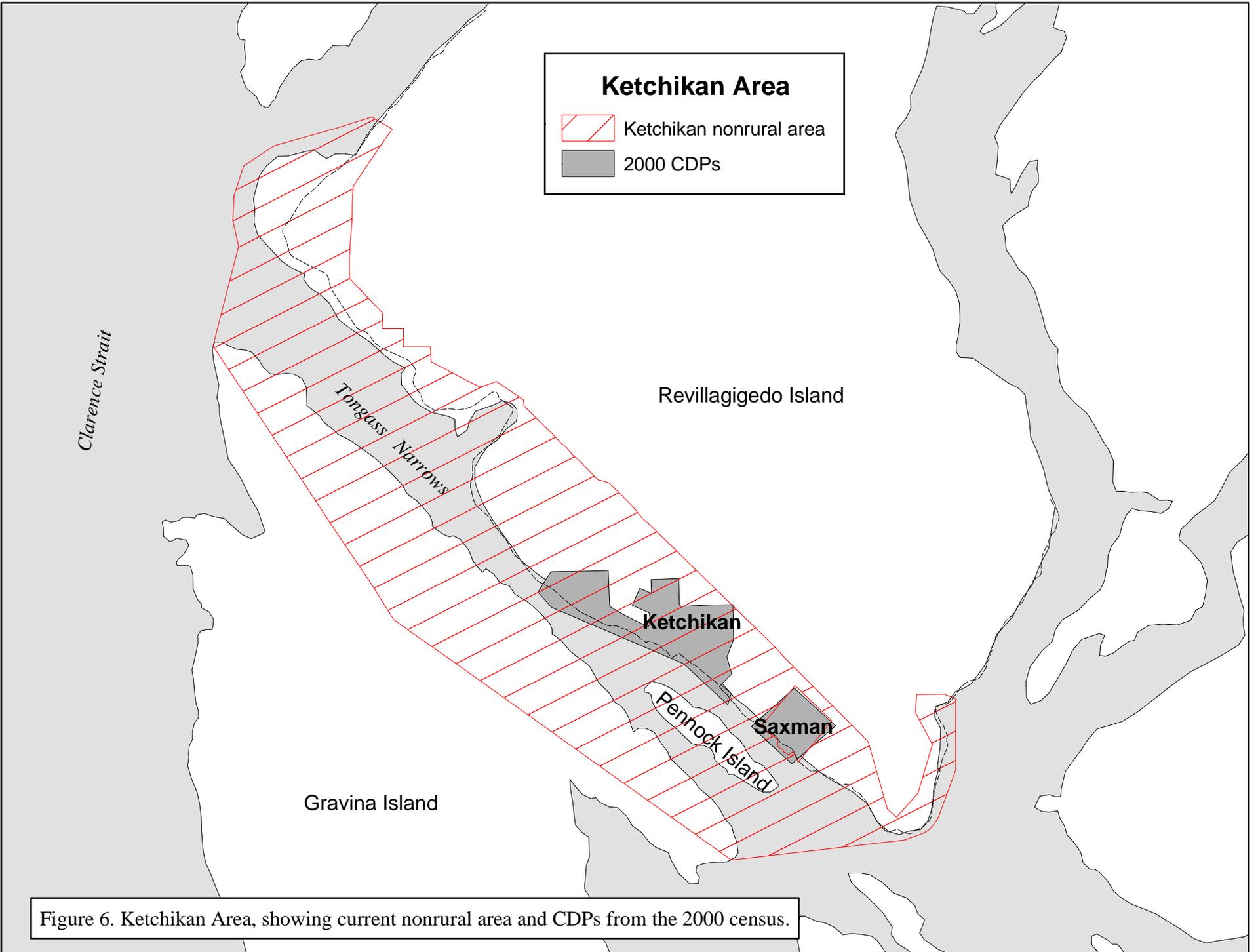


Figure 5. Seward Area, showing current nonrural area and CDPs from the 2000 census.



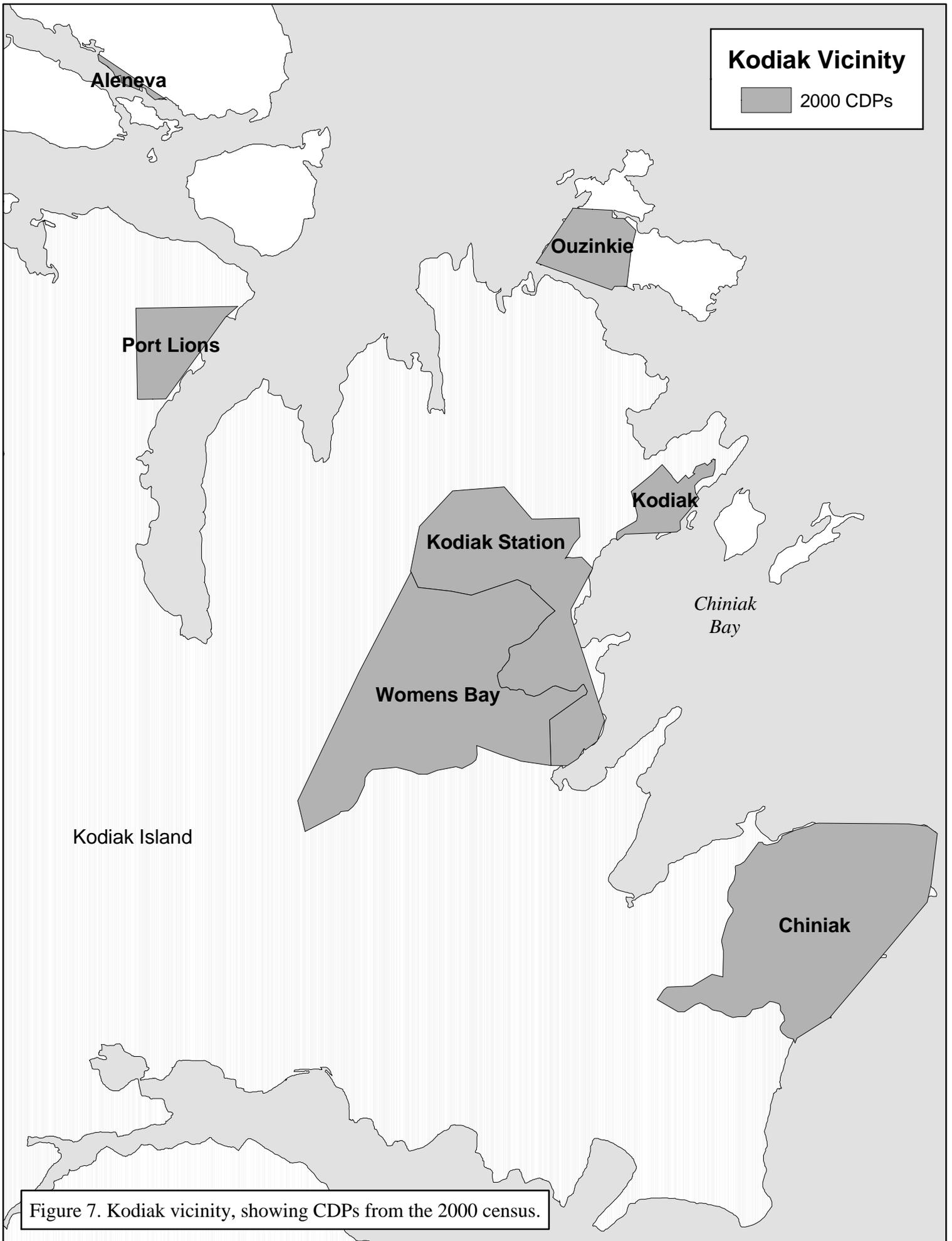


Figure 7. Kodiak vicinity, showing CDPs from the 2000 census.

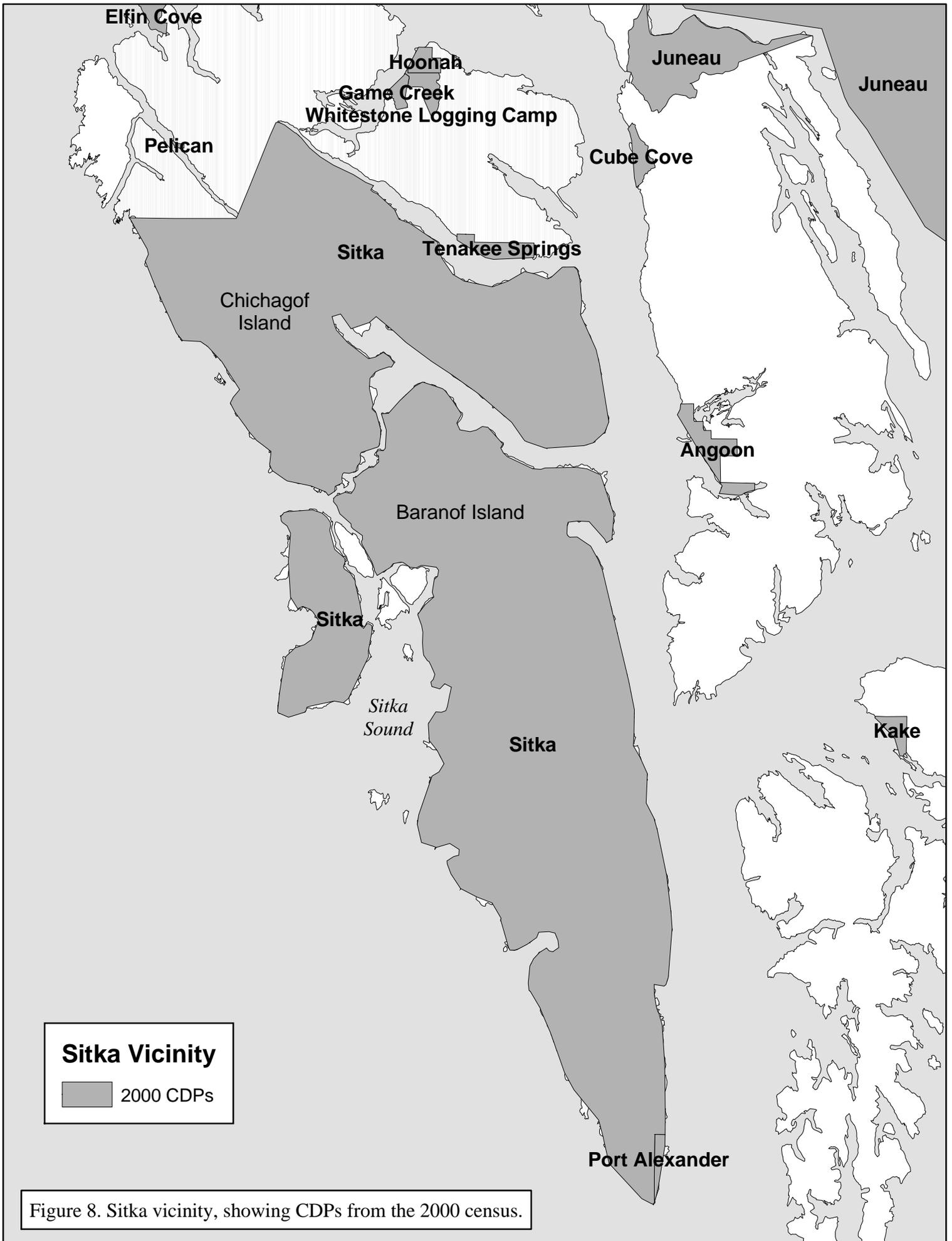
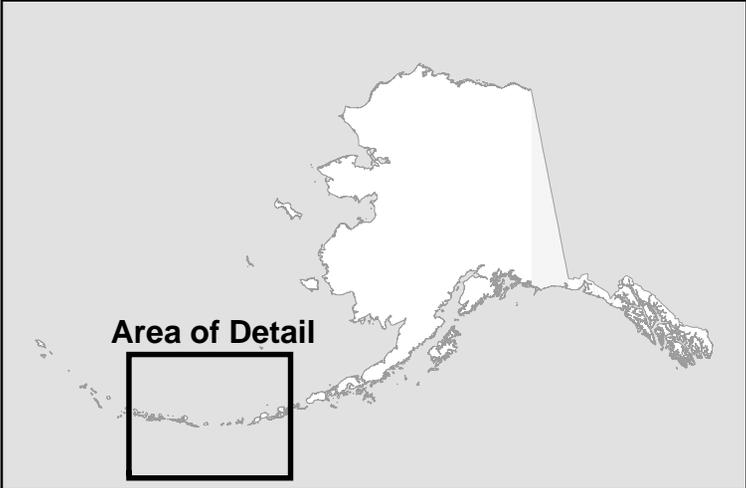


Figure 8. Sitka vicinity, showing CDPs from the 2000 census.

**Adak Vicinity**  
2000 CDPs



*Bering Sea*

**Unalaska**

**Adak**

**Atka**

**Nikolski**

*Gulf of Alaska*

Figure 9. Adak vicinity, showing CDPs from the 2000 census.

