



**Nonrural Status  
Determination (NDP25-01):  
Extended**



OOLIGAN — A Traditional Food of Ketchikan's Indigenous People

## Executive Summary

This document details information that demonstrates a reconsideration of Ketchikan’s current nonrural status. In 2022, Proposal NDP25-01 was submitted by Ketchikan Indian Community (KIC) to subsistence management officials, and it was subsequently determined that the proposal met the threshold criteria to be considered further. This investigation assesses the nature of subsistence and rurality in Ketchikan based in part on evaluation criteria that is designated in the Federal Subsistence Board’s Revised Policy on Nonrural Determinations. Further criteria are included that detail concerns such as employment rates, food, and housing security. Primary sources include publicly available knowledge, such as census data and information from the State of Alaska Department of Commerce, Community, and Economic Development; KIC’s Subsistence Household Survey (2005), which is currently the best available data on community resource consumption; a subsistence access survey distributed in August 2023 at an annual community-wide gathering; a stakeholder analysis of local vs. nonlocal use of deer on Prince of Wales (POW) Island; and qualitative data gathered through in-depth, semi-structured interviews with members of both KIC and non-Native communities that have experience with subsistence and/or struggle with accessing subsistence resources and traditional foods. Interview analysis is included in supplementary materials.

## Introduction

*“As a sovereign nation, the Ketchikan Indian Community’s mission is to enhance and protect the interests of the Tribe and its Tribal citizens, to assist our Tribal members in becoming self-sufficient through the provision of socioeconomic services, and to enrich and uphold our cultural heritage and traditional way of life.”*

Ketchikan (Kichxáan) Indian Community (KIC) resides on Revillagigedo Island in Southeast Alaska. The Tribe is a federally recognized, sovereign government comprised of Tlingit, Haida, Tsimshian, and some Unangax heritage. Revillagigedo Island is the historical territory of the Taánta Kwáan Tlingit and Saánya Kwáan Tlingit. In the 17<sup>th</sup> century, the Haida people migrated from Haida Gwaii, British Columbia. Then, in 1887, the Tsimshian people canoed from British Columbia to Annette Island, just off the coast of Revillagigedo Island. During World War II, Aleut people were relocated to a federal Civilian Conservation Corps work camp at Ward Lake

and some of their descendants now live in the Ketchikan Community. KIC serves upwards of 6,500 Tribal citizens and is the second-largest Tribal Nation in the State of Alaska<sup>1</sup>.

KIC has a history of advocating for the sovereign rights of its citizens. Many of its social, economic, and health services are run autonomously through a government-government relationship with the Bureau of Indian Affairs. One example is the Tribal Health Clinic which provides services to KIC and Saxman citizens. This sense of stewardship extends from the community to the natural and cultural resources abundant in its location in Southeast Alaska.

The biodiverse ecosystem of the Tongass National Forest has supported Indigenous Alaskans since time immemorial, providing sustenance such as food, shelter, and medicine that support the community's spiritual, cultural, and physical health. Years of evolving with the natural landscape led to the development of unique art, dance, and music. Stories transmute generational knowledge to youth, along with the practices associated with living off the land. The practice known as “subsistence” — or the gathering, consumption, and sharing of these cultural resources — is dependent on the community’s ability to access and share these resources, a key to cultural revitalization and connection to place.

## A Review of the Ketchikan Indian Community’s Nonrural Determination Proposal

KIC’s Nonrural Status Determination Proposal asks that the Federal Subsistence Board rescind its current nonrural determination. As an alternative: to designate KIC’s service area as rural for Tribal members. KIC asked the Office of Subsistence Management, Southeast Regional Advisory Council, and Federal Subsistence Board to consider the following emergent factors:

- In 2019, the City of Saxman was designated rural due to its high harvest volumes, unique cultural history, and avid advocacy for its cultural practices. Saxman, however, does utilize much of the same infrastructure, supply lines, education facilities, and healthcare options. Ketchikan is equally remote, residing on the same road system and relying on the same services.
- Ketchikan is classified as rural by several other federal agencies (see original application).
- In 2019, the island lost a key grocery vendor, Tatsuda’s, to a landslide.

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<sup>1</sup>Ketchikan Indian Community | Ketchikan, Alaska. <https://kictribe.org/>

- Revillagigedo Island and its constituents are highly dependent on privately owned barges that are vulnerable to supply line dynamics; this was especially evident during the COVID-19 pandemic.
- Increasing fuel and grocery prices due to inflation.
- PeaceHealth Medical Center is limited in the resources and services it can supply. Some people must be airlifted to surrounding community health centers.
- KIC’s original application emphasizes the wording of ANCSA, that the Secretary of the Interior and the State of Alaska must “take any action necessary to protect the subsistence needs of Alaska Natives”. Under the status quo, the cultural, physical, and subsistence needs of Alaska Natives and non-Natives in Ketchikan are not being met, per KIC’s subsistence access survey in 2023.

## Ketchikan and the Nonrural Determination Process

Since the Federal Subsistence Board (“the Board”) determined Ketchikan as nonrural, KIC has ardently pushed for reconsideration and subsequent restitution of their Tribal community’s inherent hunting, fishing, and gathering rights, and those of the entire Ketchikan community. During the current process, KIC submitted its proposal to be reconsidered for rural status in 2022. In support of its proposal (NDP25-01), KIC distributed community-wide surveys in August of 2023 at the annual Blueberry Festival, a festival that holds tremendous cultural significance to the community. The survey received 355 responses and offered insight into the community’s experience accessing traditional foods and the barriers people face when harvesting or attempting to harvest. KIC leadership and staff have attended all public comment meetings and Regional Advisory Council (RAC) meetings pertinent to the rural status application. Community members and City and Borough leaders have testified at public comment periods to advocate for their rights to subsistence harvest, and have volunteered their time and efforts to highlight the nature of subsistence and cultural ways of knowing and being through KIC-led interviews.

The Federal Subsistence Board’s Revised Policy on Nonrural Determinations allows the Board to determine a community’s nonrural nature based on a comprehensive approach that considers factors like population size and density, economic activity, military and industrial presence, the use of fish and wildlife species that under federal regulation, a community’s degree of isolation,

and other factors perceived as relevant. These factors inform part of this assessment, and some criteria are added to account for local perspectives; e.g., informant interviews, local harvesters' experiences with tourists' recreational resource harvest, etc. This provides a behind-the-scenes account of Ketchikanites' lived experience from the perspectives of long-time locals. Interviews and other qualitative data are included in the supplemental materials section. The methods and process for this assessment are included below, as well as some of the primary sources of information.

## Methods and the Data Collection Process

Demographic data collected from the 2020 US Census and State of Alaska Department of Commerce, Community, and Economic Development offer a glimpse into Ketchikan's population dynamics, income, and other factors relevant to Ketchikan's character. This data was disaggregated – when possible – by the City and Borough to demonstrate areas of living, different population densities, and characters. This data was then compared to rural Sitka. This basal comparative data was supplemented with longitudinal data on poverty, food insecurity (as shown by the number of SNAP recipients), and unemployment rates in Ketchikan. Quantitative data from KIC's 2005 household subsistence survey provides data on species harvest, quantity, and sharing in Ketchikan. The subsistence survey was used to compare subsistence participation to surrounding rural communities.

The August 2023 access survey was developed to document community testimony and understand local subsistence practices and impediments to harvest. The survey asked people their primary method of acquiring traditional foods, and whether they can obtain enough for their household dietary needs. The survey was distributed at a KIC-sponsored booth and survey respondents (n = 355) were entered into a raffle. This survey asked, in part, 1) are household subsistence food needs being met, 2) what resources are commonly harvested, and 3) what barriers prevent this harvest? This data was compiled via Excel with respondents' contact information. The survey offered the option for respondents to leave a comment regarding their experience harvesting local resources. A simple analysis and quantification of the remarks was done to group response themes. KIC used comment analysis and survey data to inform qualitative interview questions aimed to document and understand the lived experiences of Ketchikanites when it comes to subsistence, regulations, and social-cultural practices. The

interview methods and results are discussed in a separate supplementary materials section. Quantified data should be considered using both the comment analysis and interview findings.

A brief stakeholder analysis of deer harvest on POW was done using data from the Alaska Department of Fish & Game’s 2023 Deer Management Report and Plan for Game Management Unit 2 (Prince of Wales Island) and Unit 1a (Revillagigedo area). The analysis shows the different stakeholder groups that travel to POW to hunt deer. Stakeholders were organized into three groups: locals (POW hunters), Ketchikan hunters, and nonlocals. The nonlocal group encapsulates nonresident hunters and hunters not from POW (apart from Ketchikanites). This section is followed by a review of hunting on Revillagigedo Island and other areas within Unit 1a. The comparison illuminates the interrelated dynamics of hunting and harvesting efforts in both areas.

## Population and Economics in Ketchikan

When considering Ketchikan’s character, it was fruitful to distinguish between the City of Ketchikan, a home-rule city with its charter adopted in 1960, and the Ketchikan Gateway Borough, a second-class borough beholden to general State laws. The Ketchikan Gateway Borough encapsulates the City of Ketchikan and the City of Saxman with over 6,000 square miles of land. The majority of the population lives within the City, and a significant amount (5,673) live outside the City. The nature of housing, road availability, and connectivity within the City limits is visibly different compared to outside of the City limits.

## Population Dynamics in Nonsubsistence Areas

Past nonrural determinations have compared a proponent community’s characteristics to rural communities, such as the Moose Pass analysis done by OSM for Proposal RP19-01<sup>2</sup>. The proponent’s community population, density, and other characteristics were compared to nearby rural communities like the Hope/Sunrise Area and the Ninilchik area. It is assumed that the OSM’s analysis will continue to utilize this framework, and to offer a varied perspective, **Table 1** below compares Ketchikan’s population growth between 1960-2018 to *nonsubsistence* areas (typically considered urban areas) included in a study done by the Alaska Department of Fish

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<sup>2</sup> Moose Pass Nonrural Determination Proposal RP19-01

and Game Division of Subsistence in 2019<sup>3</sup>. The Prudhoe Bay area was included in the study, but excluded from this overview due to it being considered rural by the Board.

Table 1. Population Trends in Alaskan Nonsubsistence Areas Including Ketchikan

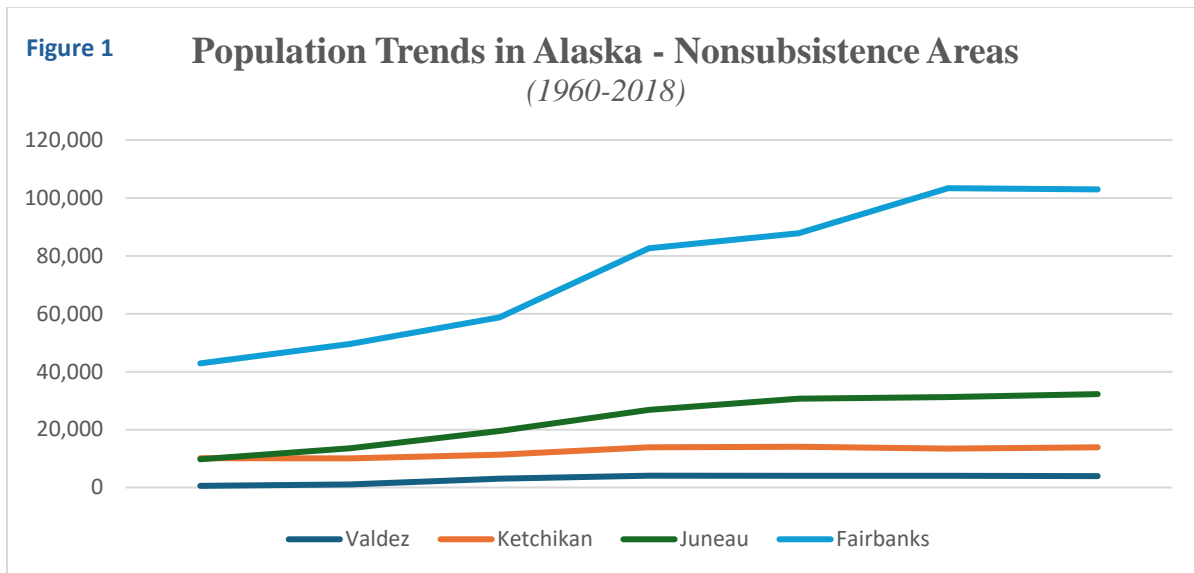
Nonsubsistence Area	1960	1970	1980	1990	2000	2010	2018	Increase (1960-2018)	% Change (1960-2018)
Valdez	555	1,005	3,079	4,068	4,036	3,976	3,903	3,348	603.20%
Ketchikan	10,070	10,041	11,316	13,828	14,059	13,477	13,843	3,773	37.50%
Juneau	9,745	13,556	19,528	26,751	30,711	31,275	32,247	22,502	230.90%
Fairbanks	42,863	49,543	58,754	82,655	87,809	103,378	102,987	60,124	140%
Anchorage	96,210	148,646	216,082	305,377	367,748	434,781	458,158	361,948	376.20%
All Nonsubsistence	159,443	222,791	308,873	432,752	504,368	589,061	613,312	453,869	284.70%

Members of the Ketchikan community and interview participants voiced their concerns that Ketchikan does not have the same magnitude of development as areas such as Juneau and Anchorage, nor the same growth potential. Comparing Ketchikan to other nonsubsistence/ nonrural areas allows a glimpse of Ketchikan from a different perspective, one that is consistent with a *nonrural* determination. It is important to emphasize that determining Ketchikan’s status should be based on whether it is urban, not whether it is as rural as its surrounding communities.

The data demonstrates that Ketchikan’s growth and population are significantly less than those of other nonrural communities. It further shows that categorizing Ketchikan under the same status as Juneau (population of 32,247 in 2018), Fairbanks (102,987), and Anchorage (458,158) is inconsistent within the context of population, economic growth, and overall growth potential. The only area in the study that had a population smaller than Ketchikan was Valdez, with a population of 3,903 at the time of the study. In the 60 years examined in the study, Ketchikan’s population had the lowest percentage of change: 37.5%. However, Valdez and Ketchikan did have a similar total change in population, at +3,348 and +3,773 respectively. **Figure 1** below provides a visual representation of the data in Table 3. It becomes clear that Ketchikan’s overall growth is incredibly low compared to other nonsubsistence areas and communities.

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<sup>3</sup> Fall, J. A. (2019). *Alaska Population Trends and Patterns, 1960–2018*. Department of Fish and Game: Division of Subsistence.



\*NOTE: Anchorage is excluded from the graph as the large population skewed the graph to make the smaller populations illegible.

Census findings used in the same study show a steady migration of Alaska Natives from subsistence areas to nonsubsistence areas. When ANILCA was passed in 1980, 27.7% of Alaska Natives lived in nonsubsistence areas. This increased to 35% in 1990. In 2000, 44.5% of those who identified as Alaska Native alone, or in combination with another ethnicity, lived in urban nonsubsistence areas. Finally, in 2010, 51.5% of Alaska Natives (alone or in combination) lived in nonsubsistence areas. This migration from rural areas to urban centers is an emerging theme for the majority of Alaska Natives. A further example is of a KIC employee who previously lived in a rural community in her youth, lived in Saxman for a time, and now lives in Ketchikan. Her family continues to practice subsistence, but they don't retain the benefits of federal subsistence.

## Economics in Ketchikan

Ketchikan began as a mining community in the late 19<sup>th</sup> century. As mineral prices dropped, the economy shifted towards commercial fishing and processing. Then, in the 1950s, timber became a precious commodity, and the Ketchikan Pulp Company opened a pulp mill that processed lumber from the Tongass National Forest. According to the article “The Ketchikan Gateway Borough: A Profile of the Island Community in Southeast Alaska”<sup>4</sup> by Rachel Baker, a labor

<sup>4</sup> *Ketchikan Gateway Borough, AK - Official Website* (n.d.). <https://www.borough.ketchikan.ak.us/>



economist, the pulp mill was the community's largest, year-round employer in what was otherwise an employment-insecure area. The mill remained the primary economic powerhouse until 1997 when supply and demand problems caused the mill to close. The mill closure left 500 people without work; many who had relatively high-paying and stable jobs lost their employment. According to Baker, the closure had impacts on other economic sectors, specifically in manufacturing, transportation, and construction. Employment in the community dropped by 7% between 1996 and 1999, and the population fell by 700 from 1996 to 2001, the year this article was published. Real estate values fell when rental units became vacant and the community entered an economic transition.

In 1995, Ketchikan saw its first growth in employment since the mill's closure, mostly in the seafood processing sector. The top five employers in 1999 were the City of Ketchikan (355 employees), Ketchikan General Hospital (348), Ketchikan Gateway Borough School District (314), Alaska Department of Transportation and Public Facilities (274), and Taquan Air Service Inc. (210). In the years preceding the article, the Ketchikan Visitors Bureau and small businesses increased efforts to make Ketchikan an attractive location for tourists. In the year 2000, around 570,000 tourists came to Revillagigedo Island. Ketchikan gradually received more and more visitors, seeing 1,188,915 visitors from cruise ships alone in 2019<sup>5</sup>. 2020 saw no passengers, of course, due to the pandemic. 2021 marked the return to cruising, with 102,562 passengers visiting<sup>6</sup>. The turnaround was full steam in 2022 with a remarkable 1,005,299 visitors, and 1,474,954 in 2023.

## Housing Security

This mass influx of visitors and seasonal employees to manage them has created an interesting dilemma in Ketchikan. The tourist market is saturated with knick-knacks and cheap jewelry stores – some of which are owned by nonlocals who travel between Ketchikan and the Caribbean selling their wares. Some small businesses have implemented unique strategies, offering cultural and scenic tours. The Alaska Department of Labor and Workforce Development used Permanent Fund Dividend recipients and employment insurance records to determine the residency of

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<sup>5</sup> Ketchikan Visitors Bureau. (n.d.). *Visit Ketchikan Alaska Visitor Statistics*. Visit <https://www.visit-ketchikan.com/Membership/Visitor-Statistics>

<sup>6</sup> Ketchikan Cruise Ship 2021 Statistics (Ibid.)

employees throughout Alaska in 2021. This was done with a degree of uncertainty as a person *intending* to become a resident but has not lived in Alaska for a full year, is counted as a nonresident. In 2021, 28% of employees in Ketchikan were nonresidents. This seasonal influx of nonresidents has contributed to a housing crisis in Ketchikan. Seasonal rentals are growing more common and are one cause of skyrocketing rental prices. Locals noted the difficulty in finding affordable housing, and some attribute it to seasonal companies being able to afford higher rents for their employees, with others noting a general lack of housing development in the area. During the off-season, it is common to find rentals available for only six months at a time on the Ketchikan Apartment Cycle Facebook page. The article “Ketchikan’s Housing Crisis Could Cost the Community a Generation,” KRBD (2022) details a meeting of the Ketchikan Gateway Borough Assembly and cites the increasing risks brought on by seasonal rentals<sup>7</sup>. The impact of seasonal rentals is a nationwide problem and decreases the availability of long-term living conditions<sup>8</sup>. While the extent of the impact is not yet completely clear, housing has become a significant issue.

A homelessness assessment was prepared by the organization Women in Safe Homes (WISH<sup>9</sup>) in Fall 2020. The assessment was conducted using a survey with 55 respondents that classified as housing insecure. Of those respondents, 88% identify as a Ketchikan resident. Nearly half of the respondents are originally from Ketchikan, Metlakatla, or Prince of Wales. All of the respondents reported having been homeless within the previous year, and 72% were currently homeless. The respondents noted limited shelter space in town, and the majority had been staying in conditions unsuitable for habitation. When respondents were asked what events led to them losing housing, loss of income and eviction were the most common contributors at 60% and 44%, respectively. The respondents’ top five most important needs were public benefits like SNAP and Medicaid, medical treatment, affordable housing, free meals, and public safety, respectively. The top four most accessible services were free meals, support groups, physical safety, and food assistance.

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<sup>7</sup> Eric Stone, K.-K. (2022, December 20). *Ketchikan’s Housing Crisis Could Cost the Community a Generation, Planning Director Says*. Alaska Public Media. <https://alaskapublic.org/2022/12/20/ketchikans-housing-crisis-could-cost-the-community-a-generation-planning-director-says/>

<sup>8</sup> Barron, Kyle and Kung, Edward and Proserpio, Davide, *The Effect of Home-Sharing on House Prices and Rents: Evidence from Airbnb* (March 4, 2020). <http://dx.doi.org/10.2139/ssrn.3006832>

<sup>9</sup> Women in Safe Homes. (2020). *Ketchikan Homelessness Assessment*. Ketchikan

Prior to May 2024, Ketchikan had three shelters for the housing-insecure population. First City Homeless Services was the primary organization located in downtown at the intersection of Park Avenue and Bawden Street. Before closing their doors and disbanding the organization in May 2024, their shelter was the only local low-barrier shelter with 40 beds, open 24 hours a day, 7 days a week, to anyone over the age of 18. The Park Avenue Temporary Home (PATH) is located directly next to First City, and open their doors 7 to 9 am and 5 to 10 pm. They require clients to have a State-issued ID and to demonstrate sobriety; anyone suspected to be under the influence of drugs or alcohol will be denied entry. WISH is located at Gateway Circuit, between the Landing Hotel and Safeway. They are a non-profit, grass-roots organization that has advocated for victim rights in Ketchikan and rural communities in Alaska for 40 years. They provide direct services for survivors of abuse and violent crimes.

The listed organizations offer integral services for members of the community, either experiencing housing issues, food insecurity, or abuse. However, as of May 15, 2024, First City Homeless Services ended their overnight services due to staffing and funding issues<sup>10</sup>. Since that time, the decision was made to dissolve the organization completely. Their services were the most accessible in the community, as they offered free, low-barrier access to job counseling, meals, and warm beds. When the City Council voted to end First City's lease in March 2024, immediate ripple effects were experienced throughout the community. More and more people are found living in public areas, creating more pressure on the already limited housing services. No alternative solutions to replace this vital resource in the community have been identified at the time of this report.

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<sup>10</sup> Fanelli, M. (2024, May 16). *Ketchikan's Primary Homeless Shelter is Stopping Overnight Service*. KRBD. <https://www.krbd.org/2024/05/08/ketchikans-primary-homeless-shelter-is-stopping-overnight-service/>

## Ketchikan Compared to Sitka

The Ketchikan Gateway Borough, *including* the City, has a population of 13,741 people, according to the 2022 census<sup>11</sup>. A majority of the population, 8,068 (59%) people, live within the City limits. The other 5,673 (41%) people live outside of the City. Compared to Sitka, the City of Ketchikan has 339 fewer people. The Borough has 2,734 fewer people than Sitka. The population of Revillagigedo Island in total has 5,334 more people than Sitka. The population density within the City of Ketchikan is 2,148 people per square mile. Outside of the City, it is 2.9 people per square mile, almost the same as Sitka's population density. Ketchikan's overall population has decreased by 1.5% since the 2020 census.

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<sup>11</sup>U.S. Census Bureau Quickfacts: Ketchikan City, Alaska; Ketchikan Gateway Borough, Alaska. (n.d.). <https://www.census.gov/quickfacts/fact/table/ketchikancityalaska,ketchikangatewayboroughalaska/PST045222>

Table 2. **Census data, comparing disaggregated data for the City of Ketchikan, the Ketchikan Gateway Borough, & Sitka.**

Economic Indicator	City of Ketchikan	Ketchikan Borough (outside city limits)	Sitka
Population	8,068	5,673	8,407
Rate of Population Change	-	-1.5%	-.025%
Population Density	2,148/sq. mile	2.9/sq. mile	2.94/sq. mile
Median Household Income	\$73,512	\$82,763	\$95,261
Persons in Poverty	11.3%	8.6%	6.9%
Percent Change Employment	-	-4.1%	NA

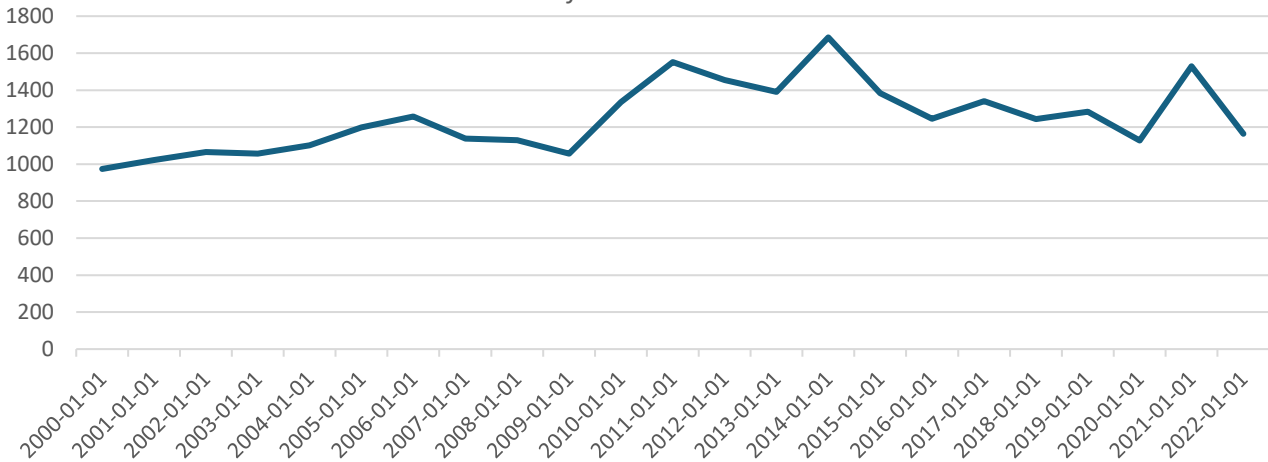
NOTE: U.S. Census Bureau data are estimates calculated since the 2020 census. When a *disaggregated* datum is not available, it is listed under the Borough. If any datum is unavailable, it is marked NA.

*Poverty:* The median income of the Borough and the City are both lower than Sitka’s median income of \$95,261. Notably, the rate of poverty in the City and the Borough is relatively high compared to rural Sitka (6.9%), at 11.3% and 8.6%, respectively. The number of people living in poverty has increased slowly between 2000 and 2022, with spikes after the 2008 recession and 2020 pandemic. The maximum number in the time graph is 1,685 people in 2014, and the minimum was in 2000 at just under 933 people.

Figure 2 below displays how Ketchikan’s poverty rate has fluctuated over time. As can be seen, Ketchikan’s population is sensitive to economic fluctuations, with the rate increasing following the 2008 recession and the 2020 Covid-19 pandemic. The number of people in poverty has been above 1,000 people for the extent of the time graph.

**Figure 2**

### Estimate of Persons in Poverty in Ketchikan Gateway Borough from the Federal Reserve

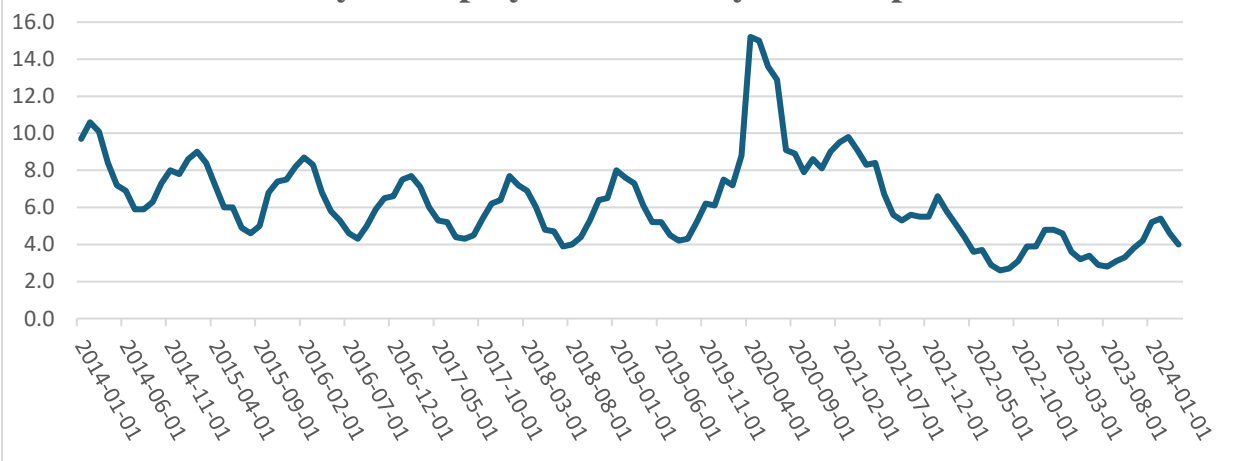


The estimated number of people living in poverty is shown along the Y-axis and the X-axis shows time.

**Unemployment:** Unemployment rates reflect the seasonal nature of Ketchikan’s economy, with unemployment peaks in the winter (January – March) and lows during the summer (July – September). This is due to the influx of seasonal workers from other areas of the country. The decrease in unemployment post-2020 can likely be explained by community efforts to galvanize tourism attraction and viability. Cruise ship data and the increase post-2020 can be found on the Ketchikan Visitor Bureau website (footnote 5).

**Figure 3**

### Monthly Unemployment January 2014 - April 2024



From U.S. Bureau of Labor Statistics. Unemployment rate (%) in Ketchikan from January 2014 – May 2024<sup>12</sup>

<sup>12</sup> U.S. Bureau of Labor Statistics, Unemployment Rate in Ketchikan Gateway Borough, AK [AKKETC0URN], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/AKKETC0URN>, May 22, 2024.

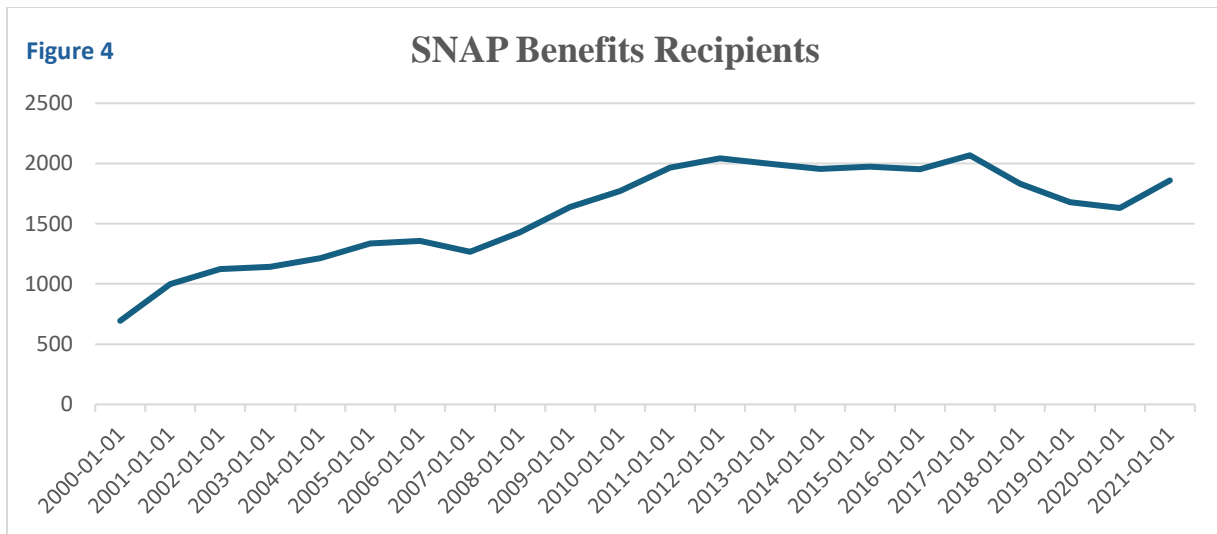
## Food Security in Ketchikan

Ketchikan has been described as a “food desert” in multiple personal communications, and specifically in Interview #6. Ketchikan’s food availability is dependent on food delivered on private barge lines or by air – a fact originally cited in KIC’s proposal. Moreover, Ketchikan’s role as a resource hub subjects it to degrees of resource pressures from neighboring islands as well as significant influxes of tourists in the summer. Another participant described tourists “buying sprees” during the summer saying, “The things we need aren’t always available,” (Interview 1). Others reference the quality or healthiness of the food in local grocery stores, “I can get 16 hot dogs for the same price as one filet of anything,” meaning filets of wild-caught fish (Interview 3). She states that the inordinate prices of market seafood are a significant barrier to accessing healthy, wild foods. She states that one of the few ways she can obtain salmon or other wild foods is through exchanging services with friends who harvest, which is discussed in the supplemental materials.

Food insecurity in Ketchikan has been and is being addressed by multiple organizations, including the Ketchikan Food Pantry, Salvation Army on Stedman Street, Salvation Army in Saxman, Love in Action, Rendezvous, Little Free Pantry in the Holy Name Catholic Church, Ketchikan School Food Pantries, and WISH. Further, several locations offer meals: the Lord’s Table through St. John’s Episcopal Church, the Southeast Senior Services, the Salvation Army soup kitchen, KIC Elders’ Café and General Assistance for KIC members, and the Ketchikan School District through the Schoenbar Middle School. Feeding America, one of the largest US-based non-profit groups or food banks, estimates food insecurity in the Ketchikan Gateway Borough at 11.3%, comparable to the rate of food insecurity in the Hoonah-Angoon Borough, at 11.6%, both notably higher than Sitka’s rate of 8.8%. The population of food-insecure in Ketchikan is 1,570. Just 43% of the food-insecure population of Ketchikan falls below the SNAP income threshold of 130% of the poverty line<sup>13</sup>, while the rest remain insecure but ineligible to access this funding.

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<sup>13</sup> *Hunger & Poverty in Ketchikan Gateway Borough, Alaska: Map the Meal Gap*. Overall (all ages) Hunger & Poverty in the United States. (n.d.). <https://map.feedingamerica.org/county/2021/overall/alaska/county/ketchikan-gateway>



Number of Supplemental Nutrition Assistance Program recipients in Ketchikan between 1990 and 2022<sup>14</sup>.

As poverty has increased, the number of people receiving Supplemental Nutrition Assistance Program (SNAP) assistance has also grown. The data responds to US economic recessions, most significantly from the 2008 recession. One participant stated, “If we were shut down for a couple of months, that would be devastating. We would have to live off the land and [either] we don't have access, or it's been overharvested.” This participant highlighted the role subsistence resources can play in supplementing food security for members of the community while noting the multiple pressures small-scale harvesters face when harvesting. Another participant spoke about the recent COVID-19 crisis; her words are as follows:

*“I remember during the pandemic...things got really scary here because you would go to the grocery store and the shelves were getting bare and certain things were not there. I remember thinking, well thank goodness we at least live in a place where food [wild resources] are plentiful.”* (Interview 3).

Reviewing the economic and population data for Ketchikan reveals multiple areas of instability (i.e., employment) and growing levels of food insecurity as seen in the levels of federal benefit recipients. Multiple, and typically discrete, organizations are working to address these issues, especially housing and food security. Individuals have compared the community to other areas in the lower 48 States, and have been shocked at the different levels of food availability and

<sup>14</sup> U.S. Census Bureau, SNAP Benefits Recipients in Ketchikan Gateway Borough, AK [CBR02130AKA647NCEN], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/CBR02130AKA647NCEN>, May 22, 2024.



consistency. Ketchikan’s economy can be characterized as variable and the population is either stagnating or declining. The sources above discuss the limitations to housing development and the outmigration of individuals due to housing shortages (see Stone 2022 and Barren et al. 2020). As one interview respondent put it, “Tourism has hurt us. As far as the subsistence board is concerned, they see us as not being rural because of it.” Her quote highlights the ostensibly quaint picture of Ketchikan but questions the equity and sustainability of development in Alaska’s first city.

## Use of and Access to Traditional (Subsistence) Foods

Two interviews were held with the Director of KIC Social Services and the Elders’ Center coordinator. The first interview was open-ended and served as an introduction to the department’s programs and the Elder community. In addition to a Meals and Wheels program, the Elder’s Center runs a complimentary communal lunch for all Alaska Native/Native Americans over the age of 55, held Monday to Friday, from 12 pm to 1 pm. They also hold an Elders’ Dinner every third Thursday of the month.

The second interview was focused more on the role of traditional foods in the community as related to social services. The Social Services Program provides traditional foods to Elders in the community through their week-day lunches and monthly Elders’ Dinner. Social Services’ Victim Services program also purchased a boat to transport individuals to harvesting areas. Staff stated that in the future the boat may serve as a community-based harvest vessel to provide traditional foods for the center and community as a whole. As part of an application for Title VI Funding for Older Americans<sup>15</sup>, KIC Social Services conducted a food consumption survey as part of an overall assessment of Native Elders’ health and nutrition in Ketchikan. The survey offers a glimpse into the consumption of Indigenous foods by Native Elders and their importance, which in interviews, has been an emphasized priority.

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<sup>15</sup> Ketchikan Indian Community. (2023). Funding for Older Americans Act Title VI: Native American Programs (93.047).

## Tribal Elders’ Consumption of Traditional Foods (KIC Social Services)

Two survey questions from the Title VI application, and their results, are included in this section:

1) Do you have access to traditional foods? 2) Do you consume traditional foods regularly?

These two questions are followed by a summary of the sample’s (n = 98) responses in a table that details the reported frequency of traditional food consumption per week. One response was missing from the first question, seven were missing from the second, and only 74 people responded to the consumption frequency question seen in Table 4. In the following, the valid percent (i.e., percentage of actual responses) is used to describe the data.

When the sample was asked if they had access to traditional foods, 22.7% of survey respondents said no, and 77.3% of respondents said yes (Table 3). 31.9% of the sample said they do not frequently consume traditional foods, and 68.1% said they *do* regularly consume traditional foods (Table 4). 52 individuals state they consume traditional foods 1-2 times per week. 16 said they eat traditional foods 3-4 times per week, and six individuals stated they eat traditional foods five or more times per week.

Table 3. Do you have access to traditional foods?

	Frequency	Valid Percent
No	22	22.7
Yes	75	77.3
TOTAL	97	100.0

Table 4. Do you consume traditional foods regularly?

	Frequency	Valid Percent
No	29	31.9
Yes	62	68.1
TOTAL	91	100

Table 5. Elders’ Consumption of Traditional Foods per Week

	Frequency	Valid Percent
1-2 times per week	52	70.3
3-4 times per week	16	21.6
5 or more times per week	6	8.1
TOTAL	74	100.0

The availability of traditional foods for Elders is likely influenced by KIC’s Elders’ lunches and dinners. Further, interview participants have stated they prioritize sharing self-harvested

traditional foods with Elders within their household and extended family units. One interview participant stated that they share between 25-50% of their harvest, and they make sure to donate or share cooked meals with Elders. Another harvester said that sharing traditional foods with the Elders program is a priority when he harvests. A pair of interview participants stated that they make sure to harvest enough to share with others because, “sharing with Elders is very important to them.” The data suggests that traditional foods are a staple for Native Elders but at varying degrees. The responses may also be influenced by the respondents’ forms of access. For instance, those who consume traditional foods 1-2 times per week may rely on the traditional foods offered at the Elders’ lunch, whereas those who consume it more often may have friends and family who can harvest for them more regularly. Some evaluation participants have suggested that proxy permits are a useful option for some members of the community, while others have stated they are unsure of how to use or purchase them.

## Subsistence Harvest & Participation Data

The use of subsistence foods in rural communities is typically measured through standardized community subsistence surveys; subsistence is characterized partly by complex trade networks, high harvest rates, and cultural, social, and economic relationships to these foods. KIC spearheaded a community subsistence survey in 2005 and formalized it in 2006, with the assistance of the University of Alaska, the Bureau of Indian Affairs, a KIC project coordinator, and community leaders. The Ketchikan community uses diverse subsistence resources, primarily from the sea and freshwater rivers near Revillagigedo, and to a lesser extent, terrestrial mammals. To date, this survey is the first and only comprehensive analysis of the use of wild resources in the Ketchikan community. The Alaska Department of Fish and Game (ADFG) usually conducts these surveys in communities with rural designations.

KIC used an ADFG-style subsistence survey instrument, adapted from the instrument used in Saxman in 1999<sup>16</sup>. Surveyors followed standard ADFG household survey protocol and were conducted in person, except for five conducted over the phone. A target number of 250 households was set for the project, equaling about 5% of households. The sample was determined with guidance from a 1996 survey in Sitka. 242 households were surveyed, equaling

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<sup>16</sup> Garza, D., Petrivelli, P., Yarr, K., (2006), Ketchikan 2005 Household Harvest Survey Final Report. Ketchikan Indian Community.

an 80.7% response rate. This survey is the most up-to-date documentation of wild resource harvest in Ketchikan.

*Harvest Participation and Distribution (All Resources)* <sup>17</sup>

The Ketchikan subsistence data from the 2005 survey demonstrate that each participation and distribution category is lower than Saxman’s 1999 survey and Sitka’s 2006 survey<sup>18</sup>. The percentage of sampled Ketchikan households using subsistence resources is lower than both Saxman and Sitka. The percentage using, trying, harvesting, and receiving, however, are still well over the majority of respondents. The portion of people giving resources is just under half the group of people harvesting. The percentage of people receiving in Ketchikan is almost twice the number of people giving. This small percentage (35%) of givers may reflect a key sub-population of the sample with the correct equipment and financing to adequately harvest and share resources. The section on access goes on to discuss possible reasons harvests may be lower in Ketchikan than in the comparison communities.

At the time of the survey, 79.8% of Ketchikan households were using subsistence foods, and 71.9% attempted to. Two-thirds of the community was harvesting successfully, and 35.1% shared those resources.

Table 6. **Levels of Subsistence Household Participation, Ketchikan, 2005**

Community	Using (%)	Trying (%)	Harvesting (%)	Receiving (%)	Giving (%)
Ketchikan (2005)	79.8	71.9	66.1	61.2	35.1
Saxman (1999)	97.2	80.8	79.4	91.7	69.8
Sitka (2006)	98.5	91	90.5	92.3	76.4

*Harvest Comparison of All Resources and Primary Species by Pound*

Consistent with the participation and distribution data, Sitka’s and Saxman’s harvests by weight and species category outweigh Ketchikan’s. Ketchikan’s primary harvest is fish, at 35,557 pounds, and land mammals at 8,403 pounds. The next highest harvest is Saxman, at 49,451

<sup>17</sup> All data is specific to the sample, not extrapolated. E.g., “Reported Pounds Harvested.”

<sup>18</sup> Alaska Department of Fish and Game, Community Subsistence Information System.

pounds of fish, and 11,003 pounds from land mammals. Sitka has the highest rates, at 81, 125 pounds of fish, and 15,318 pounds from land mammals.

Table 7. **Comparison of all Resources**

Community	Total Pounds Harvested by Sample	Mean Pounds per Household	Pounds per Capita
Ketchikan (2005)	54,845	230.8	90.4
Saxman (1999)	82,461.3	544.5	217.2
Sitka (2006)	119,220.3	464.6	174.9

Table 8. **Comparison of Fish and Mammal Harvests by Pound**

Community		Total Pounds Harvested by Sample	Mean Pounds per Household	Pounds per Capita	% of Total Harvest
Ketchikan (2005)	Fish (all species)	37,557	155.2	60.8	67.3
	Land mammals	8,403	34.7	13.6	15
Saxman (1999)	Fish (all species)	49,451	299.6	130.2	59.9
	Land Mammals	11,003	2.0*	28.9	13.3
Sitka (2006)	Fish (all species)	81,125.8	305.1	114.8	65.7
	Land Mammals	15,318	68.9	25.9	14.8

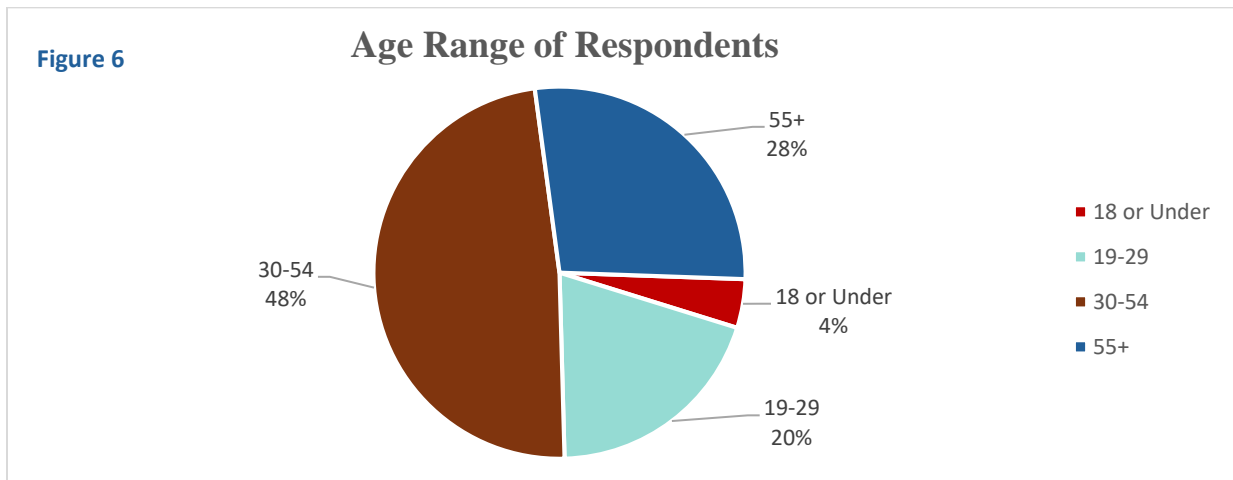
\*Survey lists a mean of 2.022 lbs of land mammal per household, which is lower than per capita. The datum may be incorrect

Sitka and Saxman generally have higher participation and subsistence harvests per the two surveys. However, the percentage of Ketchikan residents participating in subsistence harvests is not insignificant. 80% of people in Ketchikan use subsistence resources and 72% attempt to harvest. The majority of the sample participates in one form or another. The *amount* harvested is notably less, which can be influenced by several factors, including the current regulatory context (i.e., stricter limits), relevant socioeconomic factors including physical capital like harvest equipment, the financial feasibility of subsistence — or return on investment when considering gas prices and the number of trips one must make. Strict limits combined with mitigated access create a low catch per unit of effort, making subsistence less feasible, especially considering the multiple factors cited in the access survey and the supplemental interview materials. The next section provides details from KIC’s subsistence access survey and provides an image of subsistence behind the harvest data.

## Access to Traditional (Subsistence) Foods

To understand the complicated socioeconomics of subsistence in Ketchikan, KIC distributed a survey at the August 2023 Blueberry Festival, which is an annual, community-wide festival. The survey gathered data regarding access to traditional foods in Ketchikan. Survey questions included: 1) What kinds of locally harvested foods does your household have access to, 2) How

do you currently get your fish and game resources, 3) Does your household have enough access to fish and game to meet your dietary needs, 4) If not, what are some barriers preventing you from having enough access? The data presents a more in-depth look at mitigating circumstances behind harvesting and provides local change-makers preliminary statistical data to inform future community projects regarding access to traditional, or wild subsistence foods. This section illustrates the results of this survey and follows with a brief discussion of the results considering relevant qualitative interview results. The near majority of respondents (48%) were between 30 and 54 years of age. 20% were between 19 and 29 years of age, and 28% were 55 years and older. Only 4% of respondents were 18 years or younger.



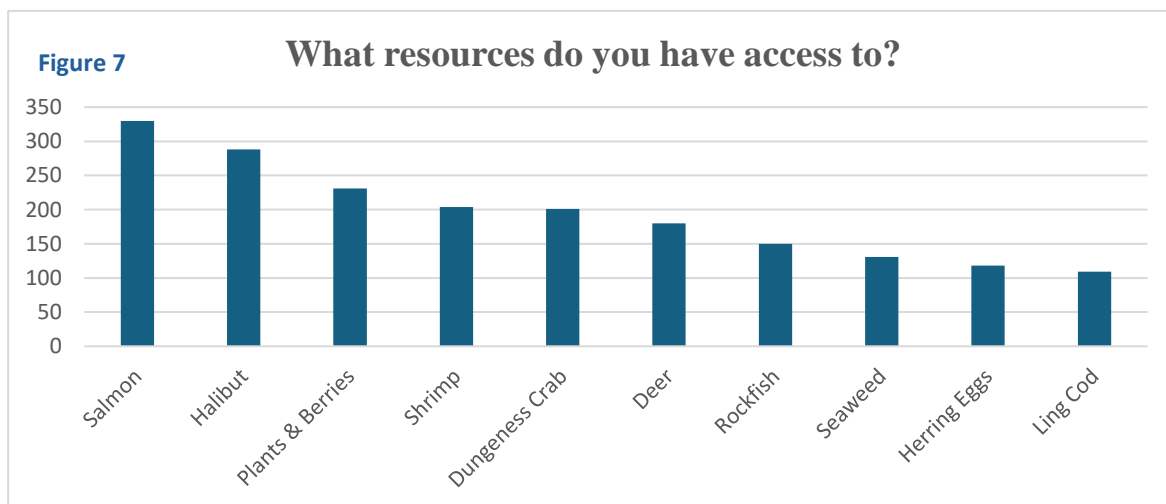
Survey respondents were allowed to choose multiple options for how they access resources, and the data reflects a multi-pronged approach to access. Of the sample, 59% of respondents stated they hunt or fish in their area to access their resources. This corresponds with the proportion of harvesters sampled in the 2005 survey. 58% stated that they rely on friends and family to share with them, a datum near to the 2005 survey’s results of 61% of households receiving resources from others. Interview data, which is provided in supplementary materials, demonstrates that those who harvest often share with others, meaning their access is supplemented by another’s. 31% of the sample purchases from a store, and 14% from commercial fishermen.

Method	# of Harvesters	% of Harvesters
I fish and/or hunt in my area	211	59%
I rely on family and friends to share	207	58%
Purchase directly from a store	110	31%

Purchase from commercial fisherman	48	14%
Other	10	3%

Table 7. How do you currently get your fish and game resources?

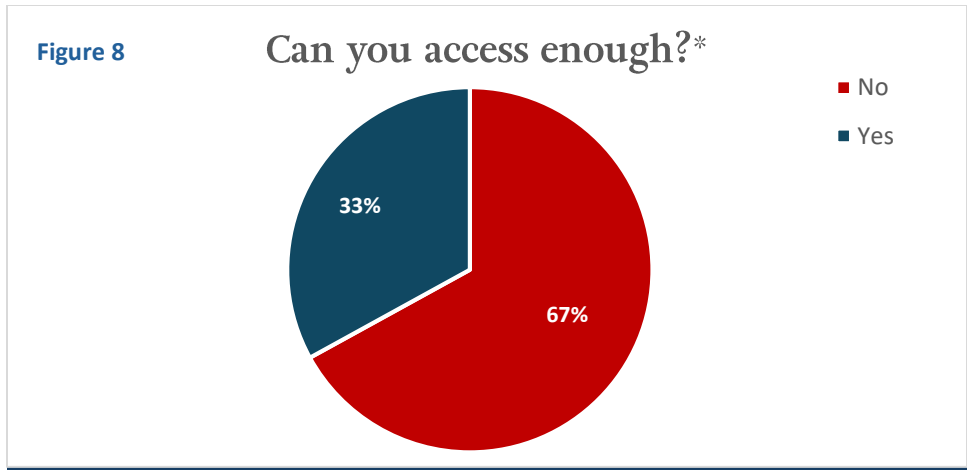
The majority of respondents stated that they can access/use salmon, halibut, plants, shrimp, and crab. Half or less of the sample said they could access deer, rockfish, seaweed, herring eggs, and ling cod. This could be in part because resources such as salmon, halibut, shrimp, and crab can be purchased from stores whereas important cultural foods such as deer, seaweed, and herring eggs must be obtained through harvest or exchange. Further, access to hunting areas and logging roads on Revillagigedo has been reported to be limited by logging activities, boat ownership, land ownership, and limited road connectivity.



\* What kinds of locally harvested foods does your household have access to?

The survey was designed for ease of use, to ensure a significant response rate. Thus, the format was not conducive to quantifying how much of a resource people harvest. In place of a quantified sample of resource use, the survey simply asked whether people could obtain enough to meet their household dietary needs. To this question, 68% said no and 32% said yes.



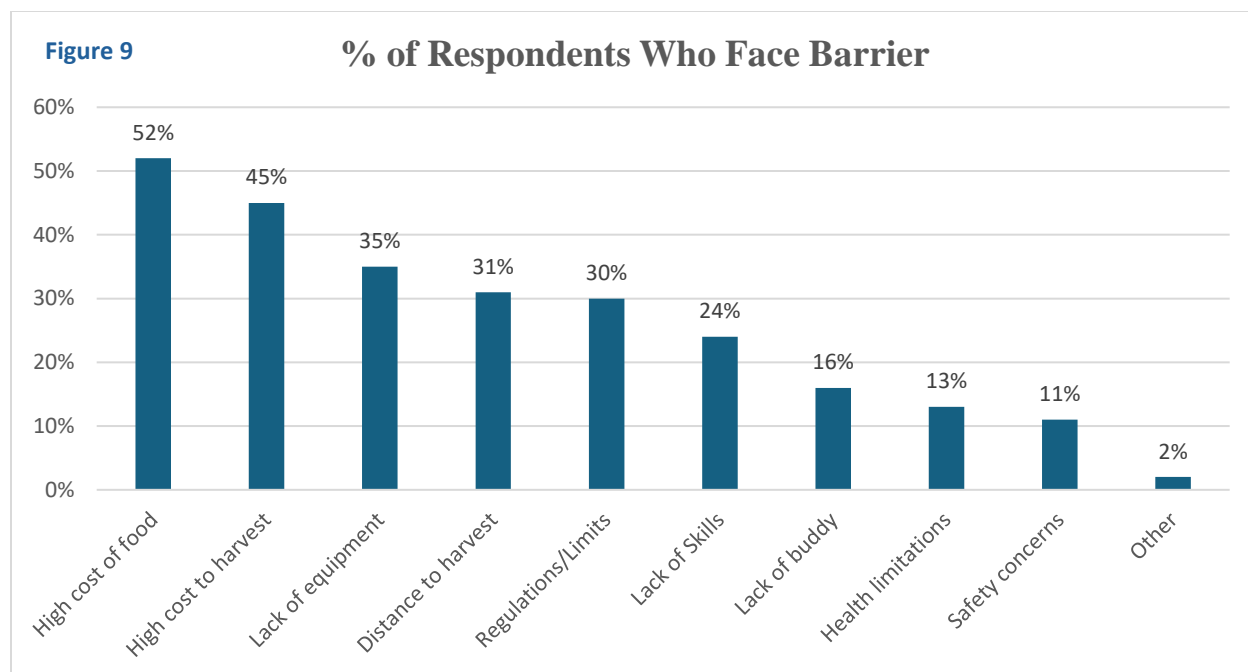


\*Does your household have enough access to fish and game to meet your dietary needs?

The amount a household or harvester requires is determined by their own needs, sharing network, and personal desires. Two participants in a joint interview said their desired amount is typically more than their individual needs, noting that they try to harvest enough so they can share with family and friends. Several others said they share with multiple households (see supplementary interview data). Others have stated they harvest enough to store for future events, such as ceremonies and celebrations. The repeated phrase, heard in conversation and other sources is “Sharing is subsistence...” (See Haven 2022)<sup>19</sup>. This was articulated in several interviews, as well as the comments section of the access survey.

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<sup>19</sup> Haven, F. S. (2022). *Alaska Native People, Traditional Foods, and the Settler State: “Subsistence” and the Narrative of Settler Belonging*. University of California, Irvine.



\* If you cannot get enough, what are some barriers preventing you from having enough access?

Several factors restricting resource access were cited in the survey responses. Here the results are discussed further, with context added from interviews.

*High cost of food:* Buying proteins in supermarkets has been noted as a financial strain. A participant from interviews held in 2023 told how her household supplements their diet with harvested foods and lamented the loss of said foods when a freezer failed. She said the monetary value of this loss would amount to thousands of dollars if bought in a store. The food served as a significant dietary and financial supplement and the loss of it proved to be “devastating... That was probably several thousands of dollars’ worth of food that we lost. It was...it was months of meals. We’re depending on that. Now I have to go buy this food.” She also holds proxy permits to harvest for her family and extended family. Another participant stated that the price of local, wild-caught proteins is much higher than imported proteins: “I can get 16 hot dogs for the same price as one filet of anything.” Note that the cost of imported proteins is still high. As discussed in the economics section, food security is a growing concern as inflation persists and people remember COVID-19 supply shortages. Several food banks, pantries, or other community service-oriented organizations offer relief for the insecure, as well as classes in food budgeting and healthy eating.

*High Cost to Harvest & Lack of Equipment:* Another significant barrier to harvesting traditional foods is the cost of the harvest process itself and the necessary equipment. The cost of boats is a primary barrier, as stated by two participants. As one Native harvester put it, “Everything takes money. The gas, the boat, the entrance, the boat upkeep, the truck, the launch fee. The jars, the electricity, the dehydrator, the shipping for the dehydrator. Even small things cost a lot of money to prepare,” (Interview 4). Rising gas prices are another concern for harvesters who already have a boat, or otherwise have access to one. One participant started a charter fishing business to justify the cost of a boat. He stated that in his experience, his work is the gateway through which he must access subsistence foods. “It's not just about the money, it's about where you can go with that job,” (Interview 5). He stated, “You can extrapolate that to everyone that runs a small business or works as a deckhand for part of a year.” His statement was relevant to the seasonal nature of Ketchikan’s economy. Earlier in the interview he shared that he worked as a contract teacher during the school season and uses his charter business to have both water access and income during the summer. He mentioned how when he is on the water, he will often see other fishing vessels with recently harvested deer hanging. They use their water access to supplement their hunting access, which mirrors other statements that hunters with boats are often more successful as they can harvest in areas inaccessible by land.

*Distance (to Harvest):* The distance one must travel to harvest is naturally dependent on the desired resource, the management regime, and resource availability. 31% of the survey sample stated this was a barrier to their harvest. The charter captain who also works as a teacher added another point that elaborates on this barrier, stating, “There's a reason that charter boats keep adding more and more motors to get further in the summer because the pressure is so localized out of Ketchikan in the first 15 miles that in many ways... people that are using skiffs are kind of being shuttered out.” He notes the effect of social pressures when harvesting, as many have said the influx of tourists and fishermen from fish lodges, cruise ships, commercial fishing vessels, etc., during the summer makes it difficult for small-scale harvesters to get on the water.

One interview participant who lives outside of the City, in the George Inlet area, stated that her access to town is limited by boat due to logging activity. In her interview, she stated that she needed to get to town by boat. “The road had been open, and they just decided to close it and do the road work at that time. Now we're limited to coming by boat, which is weather dependent,”

(Interview 1). She clarified that logging by the Alaska Mental Health Trust had closed other roads before and she was again limited to boat transit to get to town. She stated that this affects her ability to plan grocery trips and she must use weather apps and coordinate with friends in the City to see how the weather is. Participant 1 augmented this subsection by highlighting some of the access pressures *in town*. She noted that her “little community” in George Inlet lives relatively off the grid, relying on their self-harvested resources throughout the year and supplementing with staples from the grocery store. This first interview highlighted the differences between living in the City and the Borough. The City and Borough offer different services, and those living in the Borough are in much more of a “rural” setting, as they are further from services and the majority of the population. This has become a recurrent theme in casual conversations within KIC and with other members of the general community.

At the end of the access survey, respondents were asked to “share any comments or thoughts [they] may have about [their] experience with locally harvested foods—past, present and/or future.” 116 comments were written. There were several themes expressed in the comments section in response to the above prompt. It was assumed that unless a comment stated something against, or contrary to rural status, the comment was in support of the project. There was only one comment that was contrary to the “spirit” of rural status, it was “Please decrease deer limits and [season] length so we keep a substantial herd.” Instead of listing every comment, a thematic analysis was conducted using repeated codes. The decision and design process was simple. Any statement, sentiment, or expression that relates directly to the survey was considered a code and quantified in a matrix. The ones presented must have a count of five or more. Each code is followed by a count of comments that met its thematic criteria and an example quote is provided that gives an idea of the comments made for that code. In cases where a code is complex or multi-faceted, two example quotes are given.

Code	#	Example
“We are rural”	25	<p>“No part of our existence is anything but rural.”</p> <p>“Having subsistence rights would give us greater access to affordable hunting, fishing, and foraging. We live remotely and this would be a huge benefit to our family.”</p>

Food is costly	11	“As cost of food has risen dramatically in the last couple years, our household relies more and more on wild foods” “Great idea with inflation and the deterioration of food supplies and economic problems; this is a must.”
Tourists	6	“I’m tired of putting in grueling hours to hunt deeper and deeper into the woods because of development going on. So much done for tourists is making it harder and harder on people who rely on this income of food.” “I hunt and fish locally and its getting harder to harvest anything because of the charter and commercial fishing directly on our shores”
Regulations	6	“With the high cost of fuel these days, it is not cost effective to have such low harvest limits for people who live here.”
Cost to Harvest	7	“Costs and limitations make it hard to get the foods we love”
Education	6	“I didn’t have anyone that taught me how to do it. I would like to learn more. It would be great to have classes on the weekends or evenings when people are available.”
Our Way of Life OR Desired Lifestyle	27	“Fishing and harvesting locally has deepened my relationship with my community and given me a very strong sense of belonging and pride in living here.”
Health or Food Quality	7	“Local harvested foods contribute significantly to my family’s health and well-being”
Local Priority	5	“Residents shouldn’t need permits to harvest for family use.”

Table 8. Thematic Analysis of Comments from Blueberry Festival Access Survey (August 2023)

**RANKED:**

1. Our way of life OR subsistence as a desired lifestyle (27)
2. “We are rural” (25)
3. Food is costly (11)
4. Cost to Harvest and Health (7)
5. Tourists, regulations, education (6)
6. Local priority (5)

100 out of the 116 comments were codified into the above themes. The 16 comments omitted from the thematic analysis were either irrelevant (e.g., “Thanks for doing this survey!”) or did not fit into the prevailing themes (e.g., “We need more areas to drive for handicapped persons.”) Seen above is the ranking of the most common themes. The two most prevalent themes were the insistence on Ketchikan as a rural community and subsistence being either a person’s current

way of life or a desired lifestyle that is seemingly unattainable. The third most common is the rising cost of food in Ketchikan. All repeated codes are relevant to the themes discussed in interviews, to some extent. Ranging from the belief that locals should be given priority harvest to the importance of subsistence as the “Alaskan lifestyle” or Alaska Native way of life.

*Road Access - Shelter Cove Road:* Shelter Cove Road is a project undertaken by the Alaska Department of Transportation and Public Facilities. The project intends to “provide public access to existing logging road systems, expanding access for Ketchikan’s recreational and subsistence activities.”<sup>20</sup> Northern Economics prepared a socio-economic analysis for the Alaska Department of Transportation and Public Facilities to inform a need and purpose statement. The analysis also yielded projected primary and secondary impacts of the Shelter Cove Road project. Currently, the road is in its third and final stage of development, opening to the public late summer 2024.

Northern Economics used household surveys, interviews, and public data to project how the road would be used and how it would benefit the community. The report found there was an unmet need for land access where the road is being constructed. More specifically, they identified needs for recreational and subsistence activities in four areas: the Revilla Road system towards Harriet Hunt Lake, Hunt Lake towards Leask Cove, Leask to George Inlet, and George Inlet to Shelter Cove. The current roads in these areas run through Cape Fox, Alaska Mental Health Trust, and U.S. Forest Service lands. They are limited to forestry activities due to safety concerns and road suitability. Shelter Cove Road will increase public accessibility to land suitable for recreation and subsistence purposes. The road will provide reasonable access to recreation for those without a boat (per the study’s interview with the U.S. Forest Service) and increase access to private lands along George Inlet.

The most common activities in those areas at the time of the survey were sightseeing, hiking, camping, hunting, and off-road vehicle use. The study projected a 61-67% increase in the number of trips people would make after development. Survey respondents demonstrated a shift in primary activities that would take place on the new road: sightseeing, hiking, camping, freshwater fishing, and hunting.

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<sup>20</sup> Northern Economics, Inc. *Ketchikan-Shelter Cove Road*. Prepared for Alaska Department of Transportation and Public Facilities. March 2010

The study substantiates several of the claims from subsistence harvesters in Ketchikan; namely that access to suitable hunting and fishing areas is made difficult by limited road connectivity cross-island – a statement made especially by hunters who would like to drive to hunting areas. Additionally, access to certain areas for harvest is only available by boat, which is a limited commodity. Shelter Cove Road will likely increase harvest capacity and open lands that were formerly out-of-reach to subsistence and recreational harvest. Further, for respondents who live further out of town in the more remote parts of the island, the road will increase the accessibility of logging roads and serve as supplementary travel routes.

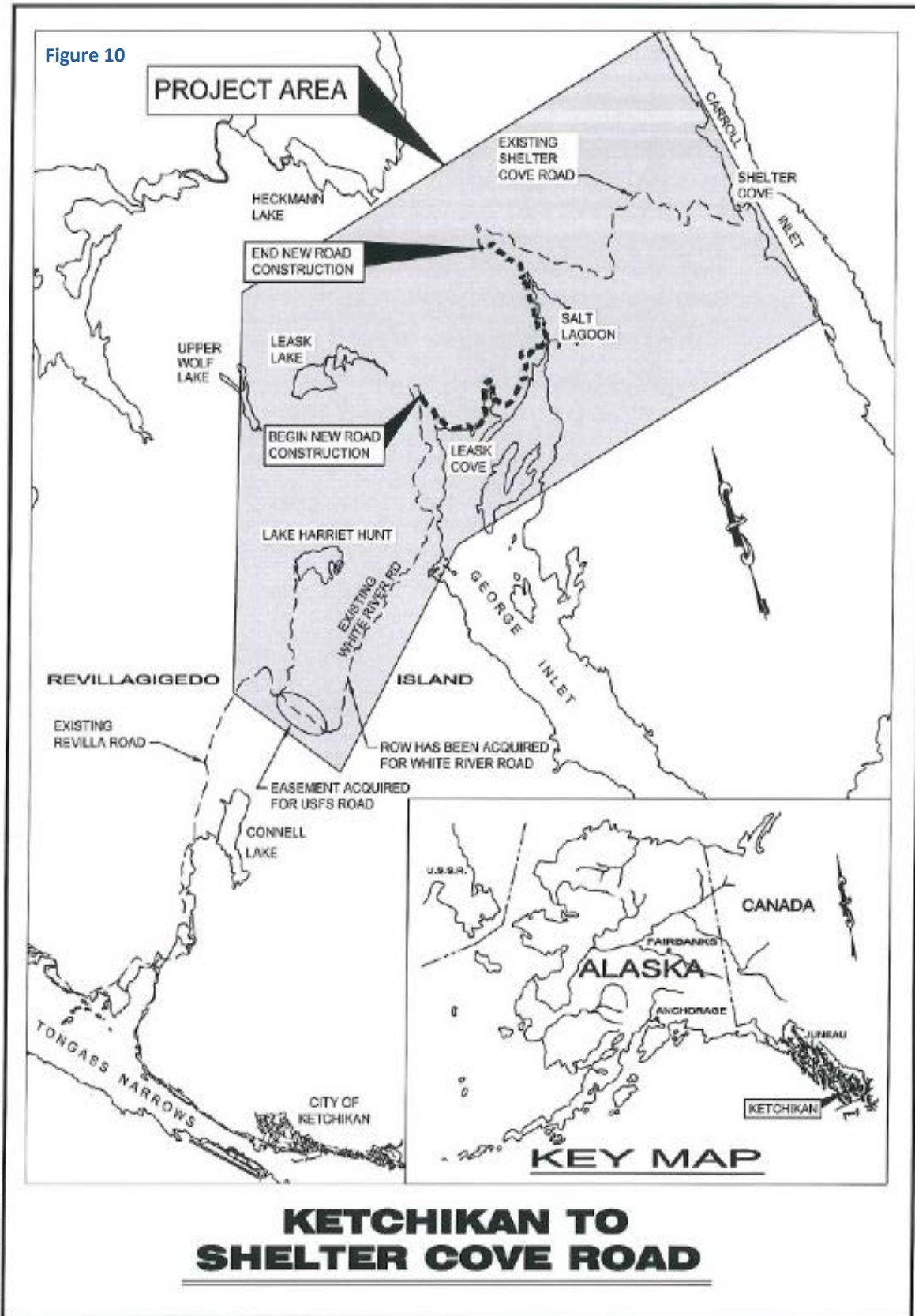


Figure 10. Shelter Cove Road Project Map



## **Stakeholder Analysis of Deer Hunting in Game Management Unit 2 – Prince of Wales (POW) and Game Management Unit 1a – Ketchikan**

Due to concerns presented by multiple stakeholders about the potential impact of increased Ketchikan hunting on Unit 2 should Ketchikan be determined rural, this section compares the hunter harvest and effort data between Unit 2 (local) residents, Nonlocals (non-POW) non-residents, and Ketchikan. The data was gathered from the Alaska Department of Fish and Game’s (ADF&G) Deer Management Report for the 2016-2021 reporting period<sup>21</sup>. Unit 2 data is followed by Unit 1a (Ketchikan) hunting data, taken from ADFG’s Deer Management Report for the same years<sup>22</sup>.

In September 2023, multiple groups presented concerns at public hearings in Ketchikan and Klawock, as well as the Regional Advisory Council meeting held in October 2023 in Klawock. These concerns were regarding the potential for more deer hunters to travel to Prince of Wales Island (POW) should Ketchikan receive Rural Status. Tribes on POW and the City of Craig presented official resolutions against Ketchikan’s proposal, stating that food security on POW may be threatened if Ketchikan hunters were allowed to hunt deer on POW under federal subsistence regulations. This section discusses deer hunting pressures on POW and compares harvest amounts and rates between regulatory years 2016 and 2020.

*Stakeholder groups:* ADFG’s game management records the residency of permitted deer hunters, which allows for a deeper look into the differences in hunter success and efforts between residencies. The total number of hunters from each category was taken from each of the reported five years and tables were created to show change in harvest and effort in each group over time. Ketchikan hunter number decreased the most at -53% and harvest went down by -70%. It was not feasible to find a causative factor that may explain this decrease. However, the next section

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<sup>21</sup> Deer Management Report and Plan, Game Management Unit 2: Report Period 1 July 2016–30 June 2021, and Plan Period 1 July 2021–30 June 2026. (2021).

<sup>22</sup> Deer Management Report and Plan, Game Management Unit 1A: Report Period 1 July 2016–30 June 2021, and Plan Period 1 July 2021–30 June 2026. (2021).

shows that the decrease in hunting on POW correlates with an increase in Unit 1 (Ketchikan). The second most significant increase was by nonresident hunters, whose numbers decreased by -46% and their harvest by -53%. These groups were followed by decreases in nonlocal hunters (-46% | -51%) and local hunters (-20% | -36%).

Table 9. Ketchikan Hunters on POW 2016-2020

KETCHIKAN		
Year	Total hunters	Total harvest
2016	679	853
2017	633	592
2018	417	364
2019	406	390
2020	316	259
% Difference	-53%	-70%

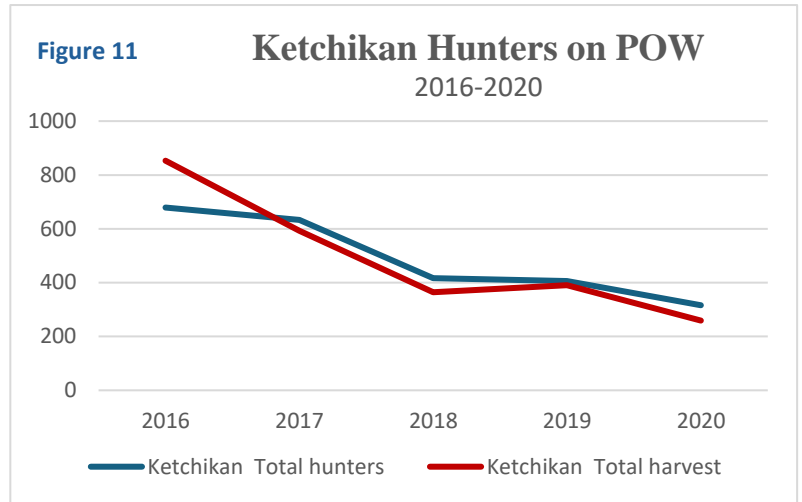


Table 10. Nonresident Hunters on POW 2016-2020

Nonresident		
Year	Total hunters	Total harvest
2016	375	229
2017	269	139
2018	227	105
2019	177	121
2020	203	108
% Difference	-46%	-53%

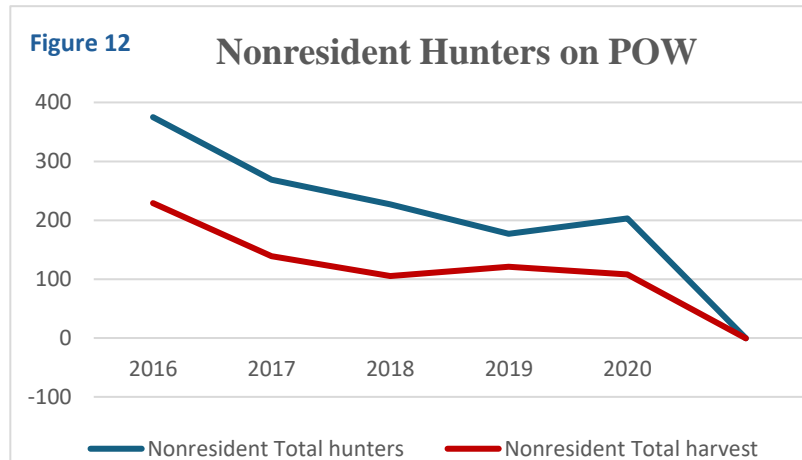


Table 11. Nonlocal Hunters on POW 2016-2020

Nonlocal		
Year	Total hunters	Total harvest
2016	539	570
2017	359	326
2018	325	300
2019	263	255
2020	291	277
% Difference	-46%	-51%

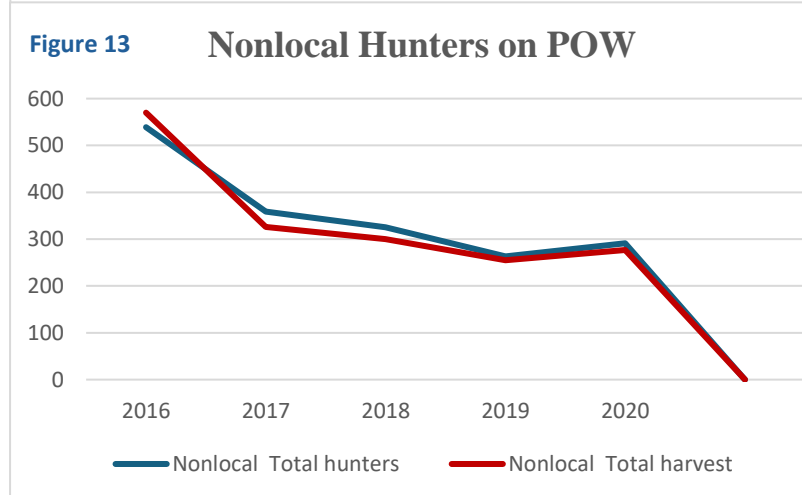
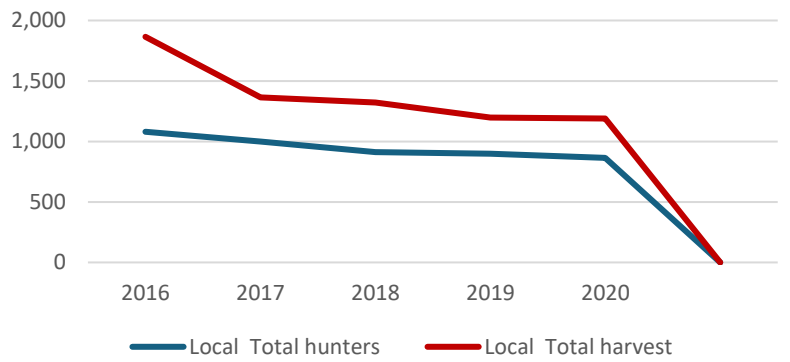


Table 12. Local Hunters on POW 2016-2020

Local Hunters		
Year	Total hunters	Total harvest
2016	1,080	1,865
2017	1,000	1,365
2018	911	1,321
2019	898	1,198
2020	865	1,189
% Difference	-20%	-36%

Figure 14

### Local Hunters on POW



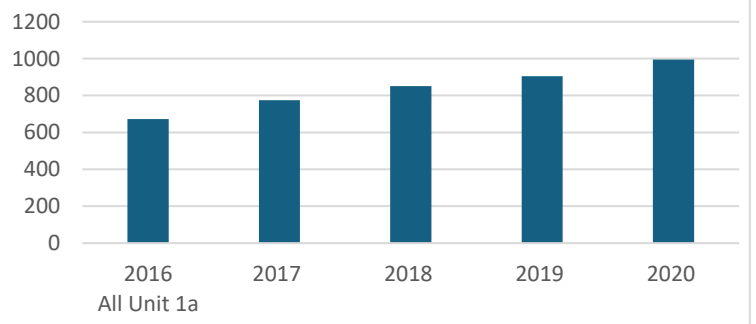
Hunter efforts and harvests decreased in all stakeholder groups from 2016 to 2020 on POW.

Ketchikan, however, has seen a corresponding increase in hunters in the same time frame: +48% (Table 13). Further, it has seen an increase in harvest by non-federally qualified (NFQ) hunters since 2008<sup>23</sup> (see Figure 16). The vast majority of NFQ hunters in Ketchikan from 2016 to 2020 are local Ketchikan residents, according to the Unit 1a report. Overall, deer harvest in Unit 1a has increased by almost 5 times. Deer harvest by NFQ hunters has increased by 5.4 times since 2008.

Table 13. Deer Hunters in All of Unit 1a (Ketchikan)

Area	Regulatory Year	Sum of Hunters
All Unit 1a	2016	673
	2017	774
	2018	851
	2019	904
	2020	995
% Difference		+47.8%

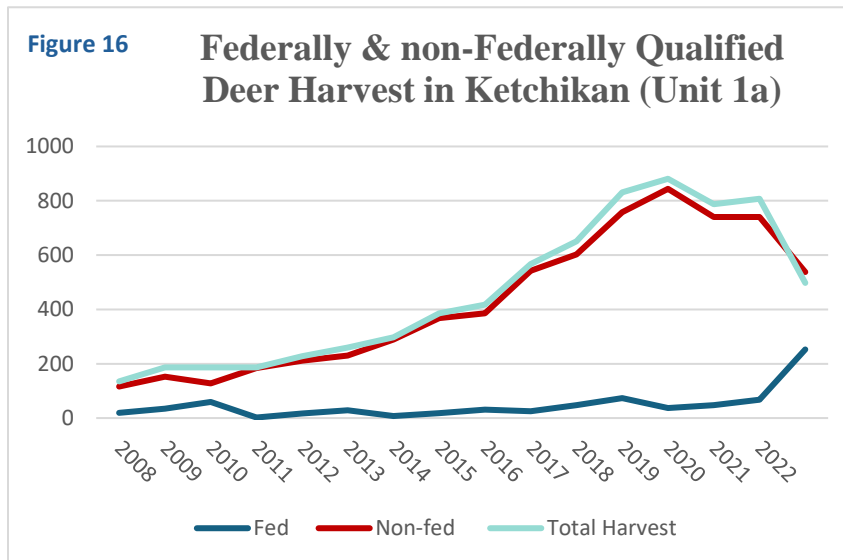
Figure 15 Deer Hunters in Unit 1a (Ketchikan) (2016-2020)



<sup>23</sup> This data was received from ADF&G Wildlife Biologist, Ross Dorendorf (March 14, 2024)

Table 14. **Federally and non-Federally Qualified Deer Harvest in Unit 1a (Ketchikan) from 2000-2022**

Year	Fed	Non-Fed	Total Harvest
2008	19	116	135
2009	34	152	186
2010	59	128	187
2011	2	184	186
2012	17	211	228
2013	29	230	259
2014	8	289	297
2015	18	368	386
2016	31	386	417
2017	25	542	567
2018	48	603	651
2019	73	758	831
2020	37	844	881
2021	47	740	787
2022	67	740	807
% Difference	+252.6%	+537.9%	+497.8%



## Community-Based Strategies:

Indigenous foods in Ketchikan play a role in the Native and non-Native communities. Variable and overlapping jurisdictions create a patchwork of regulated foods and resources (i.e., the sea asparagus harvester is of no import to subsistence management and regulations). In practice, however, beach plants are not segregated from venison, nor venison from salmon by anything more than their respective seasons and geographies. If you ask someone in Ketchikan what their subsistence harvest consists of, they may well begin with how they learned to harvest Devil’s Club for their Elders (Interview 9). Another person may tell you they cannot harvest fish because they sold their boat years ago, but they harvest sea asparagus and make jams in the summer, which they then trade with hunters for venison (Haida Elder informant). Another spoke of how he went from being a commercial fisherman intent on an astounding catch of salmon to a subsistence fisherman (he leaves the hunting to others, he is much more comfortable on the water) taking advantage of the local biodiversity and harvesting from multiple food categories.

A diversity of foods in Ketchikan are harvested, put up, and distributed – this appears to be more established within the Native community, which employs institutionalized forms of sharing and distribution. KIC Social Services and Cultural Resources have deep freezers to store salmon and herring eggs for the community. The Alaska Native Brotherhood and Sisterhood partner with Bountiful, a food bank in the community that takes traditional food donations and supports local food sovereignty by encouraging hydroponics and traditional food meals. KIC Cultural Resource Department has a Traditional Food Program and Indigenous Foods Sovereignty Coordinator tasked with targeting opportunities to increase access to and stewardship of Native, subsistence foods. This repeated value of sharing, plethora, and responsibility has been institutionalized by KIC into a contemporary community project that encourages Native peoples to take responsibility for their health, culture, and environment.

In April 2024, KIC conducted two events where they distributed herring eggs to Tribal members and their families. On the first day, around 4,000 pounds of herring eggs on kelp were distributed amongst the community. These eggs were cultivated and harvested in POW. For the second distribution, a crew of ten KIC employees traveled to Sitka during the spawn and chartered with a captain to harvest eggs on hemlock branches. They spent nine days, enduring three storms in Sitka. They worked five ten-hour days harvesting, bagging, and freezing these ecologically and culturally important eggs and brought them back to the community. The community did not disappoint at either distribution. Over 700 people were given eggs on kelp at the first event. Lines of cars showed up at the waterfront where KIC personnel took recipient names and phone numbers (logistical and regulatory reasons). At the second event, all of the 810 one-gallon bags were distributed to KIC Tribal members, their families, and volunteers. A significant



portion of the overall harvest was donated to KIC Tribal Elders program and Social Services food bank.

Figure 15. Cars line up to receive herring eggs on hemlock branches

In a brief interview with two of the volunteers, one KIC employee, originally from Hydaburg, said that the opportunity to provide for his people is “pretty freaking nice!” He had harvested herring eggs in his youth, but this was the first time in quite a while he had been able to do so again. He said that his culture had saved his life when he was younger. The other participant, a 27-year-old Tlingit woman, said it was her first time harvesting herring eggs. She is seen here loving her day’s work.



Figure 16. A person hugging herring eggs on hemlock branches as they are prepared for processing

## Conclusions:

Ketchikan Indian Community's proposal for reconsidering Ketchikan's current nonrural status is soundly based on multiple demonstrated facts:

- The community is uniquely separate from the population categories of most of the other nonrural/nonsubsistence areas.
- Ketchikan's population has declined since the last census and city officials agree that the housing crisis, if not addressed rapidly, will likely lead to further outmigration from the island.
- Food security is a growing concern in the community, as are poverty and homelessness.
- The non-Native community has multiple organizations that are attempting to address food security for everyone, as well.
- Food security in this context, and rural status itself, should not be based solely on the *availability* of "alternative resources", but also on the *accessibility* of alternative resources (one of the four pillars of food security).
- KIC is making strides in enabling its Tribal members to feed themselves with local, sustainable foods.
- The capacity and legality of accessing and managing local resources will only become more dire as the climate continues to blur the lines between regulatory regimes and community sustainability.

The Ketchikan community, as a whole, harvests at a significant rate when considering the multiple socioeconomic obstacles that have been cited in this document. The majority of the community (as sampled) uses a diversity of subsistence foods regularly and in unique manners that contribute to community connectivity and well-being. The use of Native food baskets for fundraising is a distinct method of encouraging community turnouts for projects and other needs. The number of deer hunters in Unit 1a and their harvests have also increased dramatically since 2008. Five times more people were hunting on Revillagigedo in 2022 than in 2008. The close correlation with a spike between 2019-2021 affirms the notion that subsistence serves as a dependent resource.

The current regulations (i.e., geography and bag limits) are inordinately restrictive for at least 30% of the sample that responded to the access survey. Informants have discussed how this impacts their ability to share with their loved ones, community organizations, and Elders. The inefficiency of daily bag limits has become over-encumbering when faced in tandem with increasing recreational pressures on the water, limited road accessibility, the price of gas, etc.

The community has demonstrated unique ways of adapting to these changes (e.g., sharing networks, food baskets, egg distributions, etc.). Comments left on the access survey have indicated ardent support for reconsidering Ketchikan’s status, as well as support in local public hearings. Finally, it has grown more common that when discussing Ketchikan’s nonrural status with someone unfamiliar with it, for them to say, “We’re not rural?”



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