

**CITY AND BOROUGH OF SITKA
RESOLUTION NO. 2013-16**

**A RESOLUTION BY THE CITY AND BOROUGH OF SITKA, ALASKA,
COMMENTING ON THE FEDERAL SUBSISTENCE MANAGEMENT PROGRAM'S
RURAL DETERMINATION PROCESS**

WHEREAS, the Federal Subsistence Board initiated a review of the rural determination process on December 31, 2012, requesting comments on the following components of the process: population thresholds, rural characteristics, aggregation of communities, timelines and information sources, with a submission deadline of November 1, 2013; and

WHEREAS, Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) provides a subsistence priority for rural Alaska residents for harvesting fish and wildlife resources on Federal public lands, and only residents of communities or areas determined to be rural are eligible under Federal subsistence regulations for the subsistence priority; and

WHEREAS, Sitka is an isolated Rural Subsistence community unconnected to any road system, and the vast majority of Sitka residents harvest large quantities of traditional, personal, and subsistence use fish and game year-round for both themselves and for others consistent with a rural community, as well documented by studies, surveys, and personal testimony community-wide for a large variety of fish, game, and other subsistence resources; and

WHEREAS, Sitka has had to struggle to keep its Rural Subsistence status which Sitka residents consider part of their basic cultural, economic and social identities, since its population exceeds the arbitrary population ceiling. Federal Regulations state a community with a population of more than 7,000 will be considered non-rural unless the community possesses significant characteristics of a rural nature, but this arbitrary threshold is invalid for Sitka, which has repeatedly substantiated its Rural Subsistence status, with over 90 percent of Sitka residents directly involved in subsistence gathering; and

WHEREAS, the rural determination process should be modified, as the Secretary of the Interior called for in 2009, to "ensure that the [Federal Subsistence Management] program is best serving rural Alaskans and that the letter and spirit of Title VIII [of ANILCA] are being met."

NOW, THEREFORE, BE IT RESOLVED, that the Assembly of the City and Borough of Sitka recommends several modifications to improve the rural determination process. Modify the population threshold to delete the arbitrary 7,000 beyond which a community will be presumed non-rural and change the threshold to 11,000 as recommended by the

Secretaries of the Interior and Agriculture in 2010 as a guideline only, since the current threshold levels fail to accurately define a rural Alaska community.

BE IT FURTHER RESOLVED, that the rural determination process be modified to better permit rural subsistence communities to identify their rural characteristics, including widespread use of fish, wildlife, and other wild resources, through Alaska Department of Fish and Game Subsistence studies, Coastal Management Subsistence research, and other information sources; geographic isolation; lack of connection to a regional road system; and importance of fish and other wild resources to the economic base; as the basis for retaining their continued rural designation.

FINALLY, BE IT RESOLVED, that once a community has received its rural designation, no timeline for reconsideration should be triggered unless there is substantive change in the rural community's status sufficient to re-designate the community as urban, in order to meet the intent of Title VIII of ANILCA which is to "protect and provide the opportunity for continued subsistence uses on public lands." While the various administrative, land and resource use and economic concepts that fit the "lower 48" states may meet federal agency needs in the contiguous states, these components of the determination process do not meet the needs of vast, isolated rural Alaska, which within Southeast Alaska includes more than 17 million acres of the Tongass National Forest.

PASSED, APPROVED, AND ADOPTED by the Assembly of the City and Borough of Sitka, Alaska on this 24th day of September, 2013.



Mim McConnell, Mayor

ATTEST:



Colleen Ingman, MMC
Municipal Clerk