

Special Regional Educational Attendance Area (REAA)
Recasting for the Yukon-Koyukuk School Board:

Report to the Commissioner of Education and Early
Development

May 2024



Maudrey J. Sommer School Dedication, Tanana, 2011
Source: DCRA Photo Repository

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Introduction

On June 21, 2023 House Bill 69 was signed into law modifying *AS 29.04*. This bill states that "...a first-class city with a population of less than 400... may be reclassified as a second-class city if the council submits a written request to the Local Boundary Commission." Following the passage of this bill, the City of Tanana submitted a petition to reclassify from a First-Class City to a Second-Class City. The Local Boundary Commission (LBC) accepted this petition on March 12, 2024.

Additionally, on October 4, 2023, the YKSD REAA voted to expand its current school board membership from seven to nine members. This vote was certified on October 20, 2023.

Alaska Statutes 14.08.031(a) required that the Department of Commerce, Community, and Economic Development (DCCED) in consultation with the Department of Education and Early Development (DEED) and local communities divide the unorganized borough into education services areas. Therefore, upon passage of HB 69 and the subsequent actions of the City of Tanana and the LBC, the Division of Community and Regional Affairs (DCRA) prepared the new boundary of the Yukon-Koyukuk School District (YKSD) to include the City of Tanana and expand the school board membership.

DCRA also drew new section boundaries and school board apportionment schemes within the Regional Education Attendance Area (REAA) to ensure it met the standards contained in *AS 14.08.051(a)*. The standard is that each school board member must represent, "as nearly as practicable, an equal number of persons."

DCRA used the 2020 U.S. Census data to develop new recommendations for reapportionment of the YKSD school board seats as outlined in *AS 14.08.051(c)*.

On April 1, 2024, public notices were posted on the state Online Public Notice system for the YKSD reapportionment scheme including a description and map of the possible options for recasting and an invitation for public comment. Specific area notices and maps were also sent by email to the Tanana and YKSD school districts. The public comment period closed at 5:00 pm on May 3, 2024.

A public hearing was held via video call from 10:00 am to 11:00 am on May 8, 2024. One verbal public comment was received during that hearing. That comment was also submitted in writing. No additional comments were received during the public comment period. A transcript of the written comment is attached to the relevant REAA section below.

After public comment and based on specific concerns raised in the comments received, one additional option for recasting was added to the Yukon-Koyukuk REAA.

REAA Notice, Maps, Options, and Recommendations

Invitation for Public Comment

Yukon-Koyukuk

Regional Education Attendance Area School Board Recasting

On June 21, 2023, House Bill 69 was signed into law modifying AS 29.04. This bill states that "...a first-class city with a population of less than 400...may be reclassified as a second- class city if the council submits a written request to the Local Boundary Commission." Following the passage of this bill, the City of Tanana submitted a petition to reclassify from a First-Class City to a Second-Class City. The Local Boundary Commission (LBC) accepted this petition on March 12, 2024. Per AS 29.04.045(c) this certification will not go into effect until July 1, 2024. Upon certification, the City of Tanana's responsibility of maintaining a school district will be absolved and the city will be absorbed into the Yukon-Koyukuk School District (YKSD) Regional Educational Attendance Area (REAA).

Additionally, on October 4, 2023, the YKSD REAA voted to expand its current school board membership from seven to nine members. This vote was certified on October 20, 2023.

Alaska Statute 14.08.031(a) requires that the Department of Commerce, Community, and Economic Development (DCCED), in consultation with the Department of Education and Early Development (DEED) and local communities, divide the Unorganized Borough into education services areas. Therefore, upon passage of HB 69, the reclassification certification of the City of Tanana, and YKSD's increase in school board members, DCCED is required to review the section boundaries and school board apportionment scheme of each REAA to ensure they meet the standards contained at AS 14.08.051(a). The standard is that each school board member must represent, "as nearly as practicable, an equal number of persons."

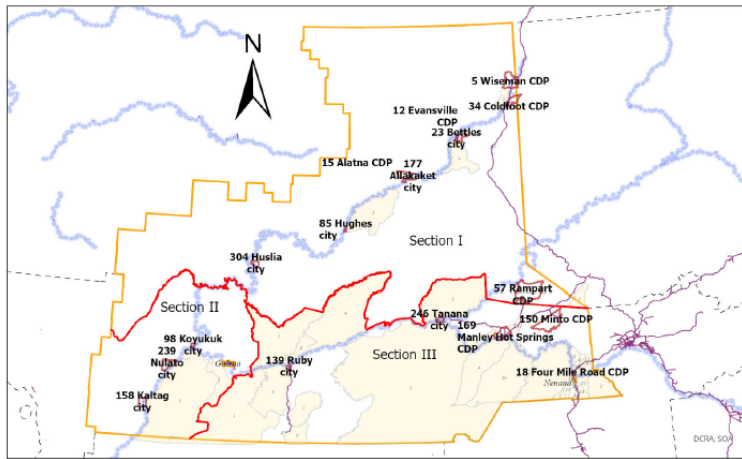
A generally accepted standard for equal representation is that the population represented by each school board member not vary more than plus or minus five percent from the average. The average is determined by taking the total population of the REAA and dividing it by the total number of school board seats. When current representation varies by more than plus or minus five percent, the Commissioner must recast the boundaries of each section to more closely meet the standard.

Under the existing school board apportionment scheme, as adopted following the statutory relocation of Rampart from Yukon Flats REAA to Yukon-Koyukuk REAA in 2022, Yukon-Koyukuk REAA has three sections containing a total of seven school board seats. Section I has two seats and includes the Cities of Allakaket, Bettles, and Huslia and the communities of Alatna, Coldfoot, Evansville, and Wiseman. Section II has two seats and includes the Cities of Kaltag, Koyukuk, Hughes, and Nulato. Section III has three seats and includes the City of Ruby and the communities of Four Mile Road, Manley Hot Springs, Minto, and Rampart as well as the areas along the Parks Highway south of Nenana and north of Four Mile. With the reclassification of the City of Tanana from a First-Class City to a Second-Class City and the increase in the number of seats from seven to nine, the voting district boundaries must again be reapportioned. Five new options are being proposed (*see attached maps*).

Option A:

- Option A contains three sections and moves the City of Hughes from Section II to Section I, moves the community of Rampart from Section III to Section I, and introduces the City of Tanana into Section III. In this scenario, Section I has three seats, Section II has two seats, and Section III has four seats. Option A has an overall deviation of 5.61 percent.

52 - Yukon-Koyukuk REAA - Option A



REAA - 52 Yukon-Koyukuk
Option A - Move the City of Hughes from Section II to Section I, move Rampart from Section III to Section I, and introduce the City of Tanana into Section III

Legend

State Highway	Yukon-Koyukuk REAA
Section Line	City outside of REAA
Census Places	Other REAs
Census Block with Population	Critical Logistics River Systems

Total Population:	2284	Seats:	9	Target Pop:	254
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	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section I		3	A B C	247.0	-2.67%
Allakaket	177				
Alatna CDP	15				
Bettles	23				
Areas (S of Bettles)	1				
Coldfoot CDP	34				
Area (N of Coldfoot)	4				
Area (S of Coldfoot)	22				
Evansville CDP	12				
Hughes	85				
Areas (N of Hughes)	2				
Huslia	304				
Rampart CDP	57				
Wiseman CDP	5				
Total	741				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section II		2	D E	249.0	-1.88%
Kaltag	158				
Koyukuk	98				
Area (S & SW of Koyukuk)	3				
Nulato	239				
Total	498				

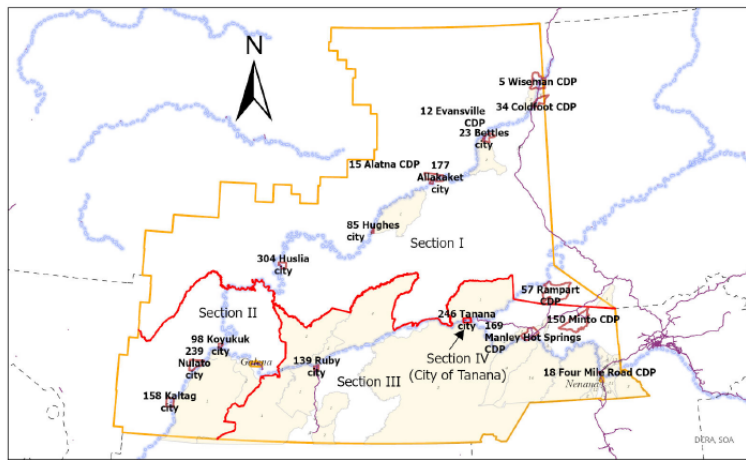
	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section III		4	F G H I	261.3	2.94%
Highway Area (Near Nenana)	261				
Areas (S of Manley)	24				
Areas (W of Manley)	6				
Areas (NE of Manley)	17				
Four Mile Road CDP	18				
Manley Hot Springs CDP	169				
Minto CDP	150				
Ruby	139				
Areas (N of Ruby)	7				
Area (S & SW of Ruby)	8				
Tanana	246				
Total	1045				

Spread	5.61%
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Option B:

- Option B contains four sections and moves the City of Hughes from Section II to Section I, moves the community of Rampart from Section III to Section I, and places the City of Tanana into a newly created Section IV. In this scenario, Section I has three seats, Section II has two seats, Section III has three seats, and Section IV has one seat. Option B has an overall deviation of 8.01 percent.

52 - Yukon-Koyukuk REAA - Option B



REAA - 52 Yukon-Koyukuk

Option B - move the City of Hughes from Section II to Section I, move Rampart from Section III to Section I, and City of Tanana becomes Section IV

Legend

State Highway	City outside of REAA
Section Line	Other REAs
Census Block with Population	Critical Logistics River Systems
Yukon-Koyukuk REAA	Census Places

Total Population:	2284	Seats:	9	Target Pop:	254
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	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section I		3	A B C	247.0	-2.67%
Allakaket	177				
Alatna CDP	15				
Bettles	23				
Areas (S of Bettles)	1				
Coldfoot CDP	34				
Area (N of Coldfoot)	4				
Area (S of Coldfoot)	22				
Evansville CDP	12				
Hughes	85				
Areas (N of Hughes)	2				
Huslia	304				
Rampart CDP	57				
Wiseman CDP	5				
Total	741				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section II		2	D E	249.0	-1.88%
Kaltag	158				
Koyukuk	98				
Area (S & SW of Koyukuk)	3				
Nulato	239				
Total	498				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section III		3	F G H	266.3	4.95%
Highway Area (Near Nenana)	261				
Areas (S of Manley)	24				
Areas (W of Manley)	6				
Areas (NE of Manley)	17				
Four Mile Road CDP	18				
Manley Hot Springs CDP	169				
Minto CDP	150				
Ruby	139				
Areas (N of Ruby)	7				
Area (S & SW of Ruby)	8				
Total	799				

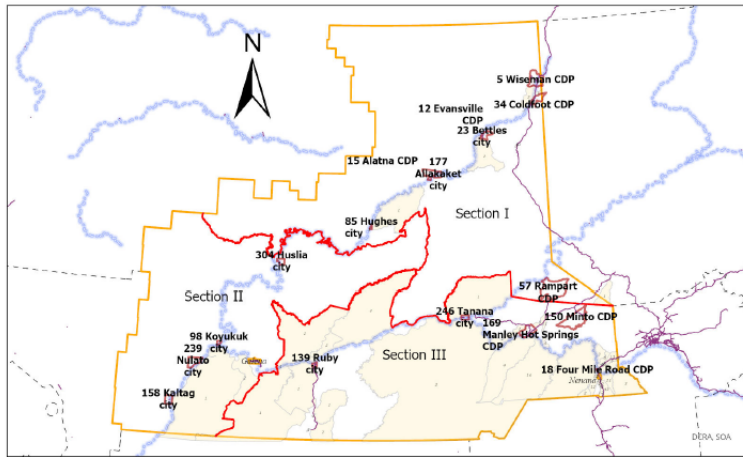
	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section IV		1	I	246.0	-3.06%
Tanana	246				
Total	246				

Spread	8.01%
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Option C:

- Option C contains three sections and moves the City of Huslia from Section I to Section II, the City of Hughes from Section II to Section I, moves the community of Rampart from Section III to Section I, and introduces Tanana into Section III. In this scenario, Section I has two seats, Section II has three seats, and Section III has four seats. Option C has an overall deviation of 19.24 percent.

52 - Yukon-Koyukuk REAA - Option C



REAA - 52 Yukon-Koyukuk
Option C - Move the City of Huslia from Section I to Section II, move the City of Hughes from Section II to Section I, move Rampart from Section III to Section I, and introduces Tanana into Section III

Legend

— State Highway	■ City outside of REAA
— Section Line	□ Other REAAs
■ Census Block with Population	— Critical Logistics River Systems
■ Yukon-Koyukuk REAA	■ Census Places

Total Population:	2284	Seats:	9	Target Pop:	254
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Section I	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
		2	A B	218.5	-13.90%
Allakaket	177				
Alatna CDP	15				
Bettles	23				
Areas (S of Bettles)	1				
Coldfoot CDP	34				
Area (N of Coldfoot)	4				
Area (S of Coldfoot)	22				
Evansville CDP	12				
Hughes	85				
Areas (N of Hughes)	2				
Rampart CDP	57				
Wiseman CDP	5				
Total	437				

Section II	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
		3	C D E	267.3	5.34%
Kaitag	158				
Koyukuk	98				
Area (S & SW of Koyukuk)	3				
Huslia	304				
Nulato	239				
Total	802				

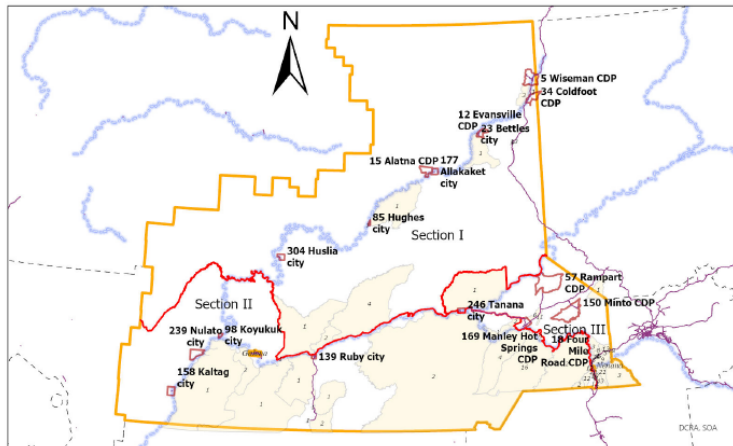
Section III	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
		4	F G H I	261.3	2.94%
Highway Area (Near Nenana)	261				
Areas (S of Manley)	24				
Areas (W of Manley)	6				
Areas (NE of Manley)	17				
Four Mile Road CDP	18				
Manley Hot Springs CDP	169				
Minto CDP	150				
Ruby	139				
Areas (N of Ruby)	7				
Area (S & SW of Ruby)	8				
Tanana	246				
Total	1045				

Spread	19.24%
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Option D:

- Option D contains three sections and moves the City of Hughes from Section II to Section I, moves the City of Ruby from Section III to Section II, and introduces the City of Tanana into Section III. In this scenario, each section has three seats. Option D has an overall deviation of 19.31 percent.

52 - Yukon-Koyukuk REAA - Option D



REAA - 52 Yukon-Koyukuk

Option D - Move the City of Hughes from Section II to Section I, move the City of Ruby from Section III to Section II, and introduce the City of Tanana into Section III

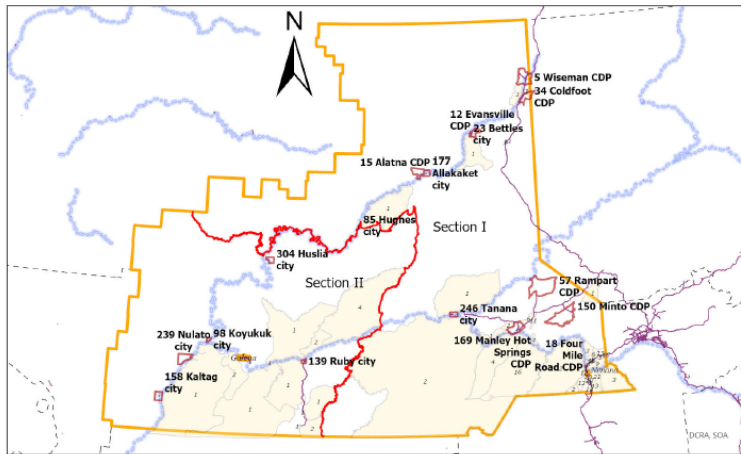


Total Population:		2284	Seats:	9	Target Pop:	254
Section I	Residents	691	Seat Count	3	Seats	A B C
Allakaket	177					
Alatna CDP	15					
Bettles	23					
Areas (S of Bettles)	1					
Coldfoot CDP	34					
Area (N of Coldfoot)	4					
Area (S of Coldfoot)	22					
Evansville CDP	12					
Hughes	85					
Area (N of Hughes)	2					
Huslia	304					
Area (N of Ruby)	7					
Wiseman CDP	5					
Total	691					
Section II	Residents	755	Seat Count	3	Seats	D E F
Kaltag	158					
Koyukuk	98					
Area (S & SW of Koyukuk)	3					
Areas (S of Manley)	24					
Areas (W of Manley)	6					
Nulato	239					
Ruby	139					
Area (S & SW of Ruby)	8					
Area W of Tanana River to Nenana	30					
Area S of Nenana, W of Hwy	50					
Total	755					
Section III	Residents	838	Seat Count	3	Seats	G H I
Highway Area (Near Nenana, E of Tanana River)	181					
Area (NE of Manley)	17					
Four Mile Road CDP	18					
Manley Hot Springs CDP	169					
Minto CDP	150					
Rampart	57					
Tanana	246					
Total	838					
Spread	19.31%					

Option E:

- Option E consists of two sections. Section I contains the cities of Allakaket, Bettles, and Tanana as well as the communities of Alatna, Coldfoot, Evansville, Four Mile Road, Manley Hot Springs, Minto, Rampart, and Wiseman, plus all outlying areas in the REAA excluding those near Koyukuk and Ruby. Section II contains the Cities of Kaltag, Koyukuk, Hughes, Huslia, Nulato, and Ruby and the outlying areas near Koyukuk and Ruby. In this scenario, Section I has five seats and Section II has four seats. Option E has an overall deviation of 4.59 percent.

52 - Yukon-Koyukuk REAA - Option E



REAA - 52 Yukon-Koyukuk

Option E - Dissolve Section III. Move the City of Ruby from Section III to Section II and move Rampart, Manley Hot Springs, Minto, and Four Mile Road from Section III to Section I. Move the City of Huslia from Section I to Section II, and introduce the City of Tanana into Section I.



Total Population:	2284	Seats:	9	Target Pop:	254
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	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section I		5	A B C D E	248.6	-2.04%
Allakaket	177				
Alatna CDP	15				
Bettles	23				
Areas (S of Bettles)	1				
Coldfoot CDP	34				
Area (N of Coldfoot)	4				
Area (S of Coldfoot)	22				
Evansville CDP	12				
Areas (N of Hughes)	2				
Highway Area (Near Nenana, E of Tanana River)	181				
Area W of Tanana River to Nenana	30				
Area S of Nenana, W of Hwy	50				
Areas (NE of Manley)	17				
Areas (S of Manley)	24				
Areas (W of Manley)	6				
Four Mile Road CDP	18				
Manley Hot Springs CDP	169				
Minto CDP	150				
Rampart	57				
Tanana	246				
Wiseman CDP	5				
Total	1243				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section II		4	F G H I	260.3	2.55%
Kaltag	158				
Koyukuk	98				
Area (S & SW of Koyukuk)	3				
Huslia	304				
Hughes	85				
Nulato	239				
Ruby	139				
Area (N of Ruby)	7				
Area (S & SW of Ruby)	8				
Total	1041				

Spread	4.59%
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Based on the REAA's demographic, socio-economic, linguistic, transportation, cultural, and communication considerations, the recommendation for the Yukon-Koyukuk REAA is to implement Option E. This option also accounts for past public comment that each section should contain multiple seats and represent multiple schools, while also accounting for the State of Alaska's desire to have a population deviation less than the desired level of five percent.

To learn more about these options and the reapportionment process please visit <https://www.commerce.alaska.gov/web/dcra/>

If you are interested in the apportionment of the Yukon-Koyukuk REAA school board, you are invited to submit comments. You may do so verbally or in writing.

Verbal comments may be submitted by calling 907-269-4559, between the hours of 8:00 am and 4:30 pm, or by voicemail at that number.

Written comments should be emailed to reaa.recast.2020@alaska.gov or mailed to:

Attn: REAA Recasting
Jedediah Smith
Department of Commerce, Community, and Economic Development
550 W 7th Ave. STE 1650
Anchorage AK 99501

Written comments must be received by **Friday, May 3rd, 2024, by 5:00PM**. Notice can be viewed on the State of Alaska web site at <https://aws.state.ak.us/OnlinePublicNotices/>

A public hearing on all recommendations will be held on **Wednesday, May 8th, 2024, from 10:00AM to 11:00AM** by electronic means. The public hearing can be accessed by going to:
<https://us02web.zoom.us/j/86234761767?pwd=ekk5aHgwaXAzaW5NK1F2M1IzdGlkdz09>

Comments:

Mr. Smith and Ms. Beaujean,

I represent the Yukon-Koyukuk School District (YKSD) and in that capacity submit the following comment and proposal regarding the recasting of the YKSD REAA section lines in light of the impending inclusion of Tanana into the REAA and the expansion of the REAA School Board from 7 to 9 members. The District reserves the right to supplement this comment and proposal as and to the extent determined necessary.

YKSD has 10 “brick and mortar” schools (including the Maudrey J. Sommer School in Tanana which YKSD is currently operating, but which will become part of the YKSD District on July 1, 2024) and 1 correspondence school (Raven Home School) for a total of 11 schools. Per the October 4, 2023 vote, the District will be governed by a 9 person board. The Board oversees the education of all students within the REAA which is approximately 65,000 square miles. Successful governance requires a broad REAA-wide perspective and participation.

Currently, the District understands that DCCED is proposing Option E. Option E proposes two Sections, I and II, with 5 and 4 Board seats in each Section, respectively. The District does not support a two-section option in light of the expansion of the Board from 7 seats to 9. Specifically, a two-section option creates a risk that a substantial number of seats could come from one community. In other words, depending on the Section, a majority or most of the Board seats could be held by members of one community depending, of course, on voter turnout. Such a possibility is not favored by the District. The District supports a three-section solution that reduces both the likelihood of an overconcentration of seats in one community and, in addition, reduces the maximum number of seats that could mathematically be from one community. The District strongly believes that dilution (from 2 sections to 3 sections) of potential concentration of board seats supports more inclusive and successful Board governance and administration of the District.

In addition, the District does not support Option B which provides for 4 sections. This is because the four-section proposal provides one seat exclusively for one community (Tanana). The District does not believe dedicating one seat for one community (and one school) in the District promotes a District-wide perspective with regard to the myriad of decisions that the District School Board is required to make each year. In this vein, a recasting that requires elected board members to be accountable to multiple schools and communities in the District is preferred.

As an alternative, the District proposes the following Option D-1 which is attached to this email. Option D-1 proposes:

1. DCCED Option D
2. In addition, move Rampart from Section III to Section I.
3. No other changes.

In the attached map, the proposed section line between Section III and Section I (moving Rampart into the latter) is for illustrative purposes only.

The change proposed by the District would meet the generally accepted standard for equal representation. The District calculates that with the change, the Section I deviation would be –

1.85%, the Section II deviation would be – 0.83%, and the Section III deviation would be 2.49%. This provides for a Spread of 4.34%.

The District proposes and supports Option D-1 for reasons including:

1. Option D-1 provides a total Spread (4.32%) that is within DCCED’s generally accepted standard for equal representation.
2. Option D-1 provides a three-section recasting that the District supports for the reasons set out above.
3. Option D-1 places the downriver communities and schools (Kaltag, Koyukuk, and Ruby) in one section which is consistent with the geography, culture, and history of the downriver communities of the REAA.
4. Option D-1 places the upriver communities and schools (Allakaket, Hughes, and Huslia) in one section which is consistent with the geography, culture, and history of the upriver communities of the REAA.
5. While not ideal from a cultural and historical perspective but necessary in light of the mandate of AS 14.08.051(a) that sections represent “as nearly as practicable, an equal number of persons,” the Option D-1 proposal to move Rampart into Section I is geographically appropriate in that Rampart is contiguous to Section I of DCCED’s Option D.

Please let me know if you have any questions or would like any additional information. And thank you for your consideration.

John

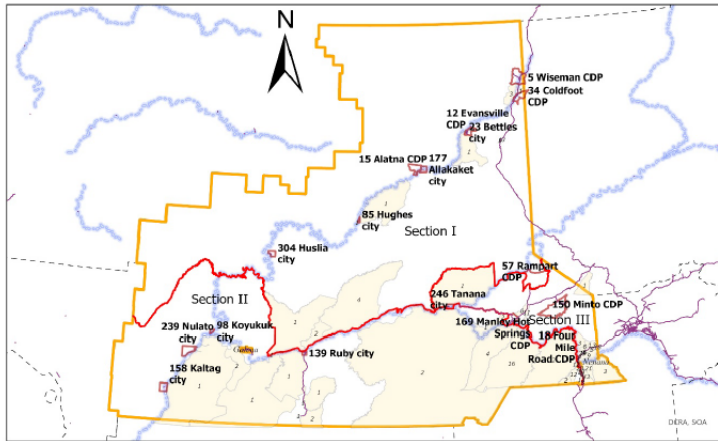
John M. Sedor, P.C.

Option F:

During the public comment period, a proposal was received that divided the school board seats in such a way that every section would have three seats, represent at least two brick and mortar schools, and maintain a deviation of less than five percent. Based on this proposal, Option F was created for consideration.

- Option F contains three sections and moves the City of Hughes from Section II to Section I, moves the City of Ruby from Section III to Section II, moves the community of Rampart from Section III to Section I, and introduces the City of Tanana into Section III. In this scenario, each section has three seats. Option F has an overall deviation of 4.33 percent.

52 - Yukon-Koyukuk REAA - Option F



REAA - 52 Yukon-Koyukuk
 Option F - Move the City of Hughes from Section II to Section I, move the City of Ruby from Section III to Section II, move the community of Rampart from Section III to Section I, and introduce the City of Tanana into Section III



Total Population:	2284	Seats:	9	Target Pop:	254
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	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section I		3	A B C	249.3	-1.75%
Allakaket	177				
Alatna CDP	15				
Bettles	23				
Areas (S of Bettles)	1				
Coldfoot CDP	34				
Area (N of Coldfoot)	4				
Area (S of Coldfoot)	22				
Evansville CDP	12				
Hughes	85				
Areas (N of Hughes)	2				
Huslia	304				
Rampart	57				
Area (N of Ruby)	7				
Wiseman CDP	5				
Total	748				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section II		3	D E F	251.7	-0.83%
Kaltag	158				
Koyukuk	98				
Area (S & SW of Koyukuk)	3				
Areas (S of Manley)	24				
Areas (W of Manley)	6				
Nulato	239				
Ruby	139				
Area (S & SW of Ruby)	8				
Area W of Tanana River to Nenana	30				
Area S of Nenana, W of Hwy	50				
Total	755				

	Residents	Seat Count	Seats	Pop per Seat	Pct Deviation
Section III		3	G H I	260.3	2.58%
Highway Area (Near Nenana, E of Tanana River)	181				
Areas (NE of Manley)	17				
Four Mile Road CDP	18				
Manley Hot Springs CDP	169				
Minto CDP	150				
Tanana	246				
Total	781				

Spread	4.33%
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Recommendation:

DCRA originally recommended Option E. In view of the comment received from John Sedor, an additional Option F has been developed for consideration. Option F has a deviation of 4.33 percent, which is within acceptable tolerances and accounts for the REAA's desire to have sections with a more equitable distribution of seats and for each section to represent more than one school within the Yukon-Koyukuk REAA.

For the reasons stated above, DCRA recommends the newly created Option F.

Commissioner Decision:

I have determined that the attached map and assignment of school board seats, labeled Option F in the data and maps provided by the Department of Commerce, Community and Economic Development, best meets the standards in Alaska statute for the apportionment of the **Yukon-Koyukuk** School Board.

This apportionment is unchanged from the current board seat boundaries.

This apportionment is a recasting of the current board seat boundaries.



Deena Bishop, Commissioner
Department of Education and Early Development

Date: 05/20/2024, 2024