

**LOCAL BOUNDARY COMMISSION**

**STATE OF ALASKA**

In the Matter of the Petition of the City of )  
Petersburg to Dissolve the Home Rule City )  
and Incorporate as the Petersburg Borough )  
\_\_\_\_\_ )

**CITY AND BOROUGH OF JUNEAU’S COMMENTS ON STAFF’S PRELIMINARY  
REPORT TO THE LBC ON PETERSBURG’S PETITION TO DISSOLVE AS A CITY  
AND INCORPORATE AS A BOROUGH**

The CBJ has no objection to the City of Petersburg being allowed to incorporate the area south of Cape Fanshaw. As stated in its Respondent’s Brief, the CBJ respects the right of the people of Petersburg to seek incorporation, and only opposes their petition to the extent that it asks the LBC to approve incorporation of an area more appropriately annexed to the CBJ. Unfortunately, as to that area (referred to herein as the “overlap” or “contested” area), the Preliminary Report is virtually silent. It appears that Staff has applied a “first in time” approach with respect to analyzing Petersburg’s petition – Petersburg filed its request for the contested area first and Staff appears to consequently be giving Petersburg’s claim considerably more “weight.” The Preliminary Report suggests granting Petersburg’s petition almost in full, without any objective consideration of the CBJ’s claim to the same area, or critical application of the requisite standards this Commission must apply.<sup>1</sup>

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<sup>1</sup> It was fear of precisely this that the CBJ requested the LBC to consolidate the two petitions, which present a very similar situation to that before the Commission with respect to the Matanuska-Susitna Borough petition (filed in June of 1989) and the Valleys Borough and Denali petitions (both filed four months later), where there was significant overlap. In that case, consolidation was granted. Consolidation was not warranted with respect to the Ketchikan and Wrangell petitions, where there was only 191 square miles of overlap, and where the two petitions were filed close enough in time to allow for the Staff final reports on each to be provided to the Commission in the same month. It seems logical to surmise that it is for situations exactly like the one posed by the Petersburg and CBJ petitions that 3 AAC 110.640 and 3 AAC 110.430 were promulgated.

The Commission has two petitions before it seeking the same area.<sup>2</sup> There are no constitutional provisions, statutes or regulations that allow the Commission to make a determination on competing petitions based on which was filed first, or to engage in a less than thorough analysis of the later-filed petition. In describing its role to the Alaska Legislature, this Commission stated “[T]he LBC has a mandate to apply pre-established standards to facts, to hold hearings, and to follow due process in conducting petition hearings and rulings.”<sup>3</sup> The Commission further explained that with respect to Staff’s role, “due process” was “best served by providing the LBC with a thorough, credible, and objective analysis of every municipal boundary proposal.”<sup>4</sup> It does not appear that occurred with respect to the Petersburg petition, and it certainly cannot occur with respect to the CBJ’s annexation petition given the current procedural posture.<sup>5</sup>

The Alaska Constitution requires that boroughs “embrace an area and population with common interests to the maximum degree possible”<sup>6</sup> That constitutionally-mandated standard cannot, by its plain language, apply to more than one entity with respect to the same contested area. Either the post-annexation CBJ borough would embrace the overlap area to the maximum degree possible, or a newly-created Petersburg borough would. Given the Report’s failure to critically analyze the CBJ’s claim to the contested area, and the fact that the Report’s

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<sup>2</sup> The CBJ has been informed by LBC Staff that its petition has been “informally accepted” for filing, and that the only reason public notice has not yet posted is due to staff shortage issues.

<sup>3</sup> *2011 Local Boundary Commission Report to the 27<sup>th</sup> Alaska State Legislature, 2<sup>nd</sup> Session* (February 2012), p. 3.

<sup>4</sup> *Id.* at p. 6.

<sup>5</sup> Indeed, it appears that Staff may have failed to hold the public meeting required by 3 AAC 110.520. *See* 2011 Local Boundary Commission Report, *supra*, at p. 8 and Preliminary Report, also at p. 8: “If the petition is for incorporation, the LBC staff must hold at least one public meeting within the boundaries proposed for incorporation. When it ends its analysis, the LBC staff issues a preliminary report including a recommendation to the LBC.”

<sup>6</sup> Alaska constitution, article X, sec. 3. (Emphasis added).

recommendation as to the overlap area is based almost solely on rationale relevant only to that area south of Cape Fanshaw, any final determination based upon the Preliminary Report would be an abuse of the LBC's discretion.

**I. THE PRELIMINARY REPORT FAILS BOTH TO THOROUGHLY ADDRESS THE CONTESTED AREA AND TO MAKE ANY OBJECTIVE FINDINGS WITH RESPECT TO THE CONTESTED AREA**

The findings made in the Preliminary Report are premised almost entirely upon an examination of the people who reside in the areas outside Petersburg (whom are identified as “outliers” and none of whom live in or near the contested area), and how those people are “interrelated and integrated” to the required degree. There is no discussion or application of the requisite standards to the contested area.<sup>7</sup> While the CBJ recognizes the limitations that exist in applying some of the standards to the overlap area given the lack of population, that does not justify a recommendation on the overlap area being made based on the “outliers” relationship to the City of Petersburg alone. The constitution requires an objective consideration of both the “population” and the “area.” Yet, despite the fact that none of the conflicting evidence offered by the CBJ was discussed, or the fact that the arguments offered by Petersburg in support of its petition relate almost exclusively to that region south of the overlap area, or to the fact that the Report fails to make any critical findings related to the overlap area, Staff finds “the entire proposed borough embraces an area and population with common interest to the maximum degree possible.”<sup>8</sup>

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<sup>7</sup> Staff does make one general, blanket comment that “residents of the proposed borough... have a common interest in fishing and hunting in the lands of the proposed borough,” but Staff neither explains how it came to that conclusion, nor makes any reference to the CBJ's contradictory evidence. The report does engage in some discussion regarding commercial fishing, but there is no evidence or facts offered to support the comment regarding fishing for “private purposes.”

<sup>8</sup> Report at p. 13. (Emphasis added).

An objective analysis of the overlap area illustrates that the area is more closely related to the CBJ than to Petersburg, and accordingly, annexation to the CBJ would satisfy the constitutional mandate that the area be part of the borough with which it has common interests to the maximum degree possible. This is true for many reasons, which were simply not addressed, considered, or acknowledged in the Preliminary Report.

**A. Most of the privately-held land in the area proposed for annexation is owned by Juneau residents or Juneau-based companies (3 AAC 110.060(a)(1)).**

It cannot be disputed that the majority of the privately-held land in the contested area is owned by Juneau residents or Juneau-based companies:

- Goldbelt, Incorporated, the Juneau-based Alaska Native, for-profit corporation organized under the Alaska Native Settlement Claims Act, owns approximately 30,000 acres of land in Hobart Bay<sup>9</sup> Placing this Goldbelt-owned land, a major business asset, in a different borough than its corporate headquarters are located complicates management and governance.
- Of the mining claims identified in the contested area, the largest claim holder is Hyak, based in Juneau. The Hyak companies hold approximately 36 claims located near Windham Bay, each reportedly 20 acres in size.<sup>10</sup>
- In Holkham Bay, Tracy Arm and Endicott Arm, Sealaska, an Alaska Native Corporation with its corporate offices in Juneau, owns subsurface rights to their own lands (290,000 acres) as well as subsurface rights to all village and urban corporation lands in the area proposed for annexation (a total of 280,000 acres).<sup>11</sup>
- The majority of privately-held property in Windham Bay is owned by Juneau residents.<sup>12</sup>

The Report does not refer to any privately-held land in the contested area being held by Petersburg-based companies or residents.

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<sup>9</sup> <http://www.goldbelt.com/lands-real-estate/hobart-bay>

<sup>10</sup> Annexation Petition, p. 43 (Reported by JEDC (Alaska Department of Natural Resources Land Records); interview with Hyak.)

<sup>11</sup> <http://www.sealaska.com/page/sealaska-lands-myths-and-facts.html>

<sup>12</sup> CBJ Responsive Brief, Exh. 2, p. 20; Annexation Petition, p. 43.

**B. Administrative and Political Boundaries (3 AAC 110.060(b)).**

3 AAC 110.060(b) provides that:

When reviewing the boundaries proposed in a petition for borough incorporation, the commission may consider

- (1) model borough boundaries for the area within the proposed borough;
- (2) regional boundaries, including
  - (A) boundaries of one or more regional educational attendance areas existing in that proposed borough area;
  - (B) federal census area boundaries;
  - (C) boundaries established for regional Native corporations under 43 U.S.C. 1601 -1629h (Alaska Native Claims Settlement Act); and
  - (D) boundaries of national forests. One topic that the Preliminary Report fails to mention in its discussion of the appropriate boundaries for the new Petersburg borough is the existing administrative and management links between the CBJ and the contested area (especially as it applies to that area from the existing CBJ southern border to, and including, Hobart Bay).

The Preliminary Report fails to address the existing administrative and management links between the CBJ and the contested area.

In 1997, the Commission published its Model Borough Boundaries Report. The purpose of the report was to create a “frame of reference” for the LBC to use “in the evaluation of future petitions.”<sup>13</sup> The report recommends that essentially the same area Juneau now seeks to annex be made part of the CBJ. While the model borough boundary designations no longer carry a presumption, they are still meaningful and relevant. Yet there is no discussion in the Preliminary Report explaining why the LBC’s prior findings with respect to this contested area should now be considered invalid. The Commission has previously referred to that area from the current CBJ boundary to Hobart Bay as the “unorganized remnant” of the CBJ, and has found it to be

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<sup>13</sup> *Model Borough Boundary Report*, State of Alaska Department of Community and Regional Affairs, Revised 1997, p. 2.

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most closely linked with the CBJ. The CBJ is unaware of any change or circumstance that would justify the Commission now reversing its prior findings.<sup>14</sup>

Additionally, four current state or federal designations make an administrative connection between the contested area and the CBJ for the purpose of facilitating area management of resources: the USDA Forest Service; Juneau Ranger District; Area 1C Alaska Fish and Game Management Unit; the Juneau Recording District; and the United States Custom's Port of Juneau "Area of Responsibility."<sup>15</sup> There is simply no discussion in the Preliminary Report to suggest that Staff considered or applied 3 AAC 110.060(b) to any of the contested area.

### **C. Tourism and Guiding Companies (3 AAC 110.060(a) and 3 AAC 110.045)**

One piece of evidence relied upon in the Preliminary Report is the finding that "tourism or guiding companies originate their trips from Petersburg, or their clients arrive by air to Petersburg, or supply in Petersburg."<sup>16</sup> Yet in order to make a reasoned finding that this fact creates a connection with Petersburg to the "maximum degree possible," the Commission must find that the CBJ's claims to the area based on the same factor – use of the area by CBJ-related tourism and guiding companies – is less than Petersburg's. The Preliminary Report engages in no such analysis. In reality, the data for the area south of the current CBJ boundary to Hobart Bay indicates exactly the opposite. Tourism activity in this area is led by tourism and guiding companies either based in the CBJ or who report provisioning primarily in the CBJ. Through

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<sup>14</sup> Additionally, under 3 AAC 110.060(b)(6), the Commission must find that the proposed "boundaries are the optimum boundaries for that region in accordance with art. X, sec. 3." Not only does the Preliminary Report fail to consider this standard, it does not explain why the Commission's prior findings concerning the optimum boundaries of the contested area – namely the model borough boundary – should not be relied upon.

<sup>15</sup> This is true historically as well. For example, the US Bureau of Mines designated the "Juneau Gold Belt" to run from the current CBJ to Windham Bay. United State Department of the Interior. Juneau Gold Belt Area, 1986 Update. Earl Redman, Ken Maas, Al Clough, Joseph Kurtak.

<sup>16</sup> Report, p. 27.

executive interviews with companies providing wilderness trips in the lands and waters between Tracy Arm and Port Houghton, the CBJ presented evidence of estimated annual economic activity of just over \$9.4 million in 2011, and an annual visitor stream of 22,200, with a majority of the outfits being based in, or provisioning primarily in, the CBJ. The data shows much less use of the area by Petersburg tourism operators<sup>17</sup>

#### 1. Land-Based Use

USDA Forest Service permits issued for land use in the contested area in 2010 show eleven permits were issued to Juneau-based tourism operators or guiding companies serving 247 clients, while only one permit was issued to a Petersburg-based organization, serving six clients. A multi-year look from 2006-2010 shows significantly more Juneau-based use and socio-economic connection and dependence to the overlap area than Petersburg can claim. According to the data reported by the CBJ in both its responsive brief and annexation petition, three Petersburg-based providers hosted 231 clients from 2006 – 2010, while sixteen Juneau-based land use tourism providers hosted 2,011 clients.<sup>18</sup>

#### 2. Boat-Based Tourism Permits

Again, according to the USDA Forest Service, of the 29 US Forest Service permits issued in 2010 for boat use in the contested area from Juneau to Hobart Bay, 23 were issued to boats

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<sup>17</sup> See CBJ's Responsive Brief, Exh. 2, at pp.48 – 51 and Annexation Petition at pp. 45 – 47. The Petitioners attempt to discredit the CBJ's findings by mischaracterizing the intent of the analysis, and by engaging in a likewise misleading "he-said, she-said" commentary (and even suggesting that some interviews didn't happen at all). Reply Brief at p. 41. In addition to the "hard data," reviewed by the Juneau Economic Development Council, extensive executive interviews were conducted with officials from 20 of the most significant tour operators using that area, in order to capture a sense of the total tourism-based economic activity in that area. The CBJ is happy to share full interview notes, names of the officials interviewed, along with interview dates and phone numbers. Interviewers contacted some of the larger operators up to three times to ensure that an accurate accounting of each company's activities was being captured.

<sup>18</sup> See CBJ's Responsive Brief, Exh. 2, at p. 48; CBJ Annexation Brief at p. 46 (Source: Bill Tremblay, US Forest Service.)

that provisioned in Juneau, including 17 vessels that were either solely provisioned in Juneau, or provisioned in Juneau and a community other than Petersburg. In comparison, four boats were provisioned solely out of Petersburg, or in combination with another non-Juneau community.<sup>19</sup>

This evidence indicates a large difference in the scale of tourism-based activities taking place in the contested the area with ties to Juneau versus Petersburg, yet this evidence is not objectively considered, or even acknowledged, in the Preliminary Report.

**D. Commercial Fishing (3 AAC 110.045 and 3 AAC 110.060)**

The Preliminary Report recognizes that a significant amount of fishing takes place in the contested area, and relies heavily upon that fact in making findings based on the standards outlined in 3 AAC 110.060.<sup>20</sup> While it is true that Petersburg fishers do engage in more fishing in the contested area, Juneau residents engage in a significant amount of commercial fishing in the contested area as well. Between 2005 and 2010, Juneau fishers landed approximately 311,000 pounds of seafood in the area between the current CBJ border to slightly past (and including) Hobart Bay, earning nearly \$800,000 out of an approximately \$5.4 million earned by all Southeast fishermen.<sup>21</sup> Thus, on average, between 2005 and 2010, Juneau fishermen realized 15% of the value of the seafood harvested in the overlap area, while Petersburg fishermen were responsible for 66% of the total catch landed by Southeast Alaska residents. Significantly, these percentages vary from year to year. For example, in 2005, Juneau residential fishermen brought in 25% of the total catch value.<sup>22</sup>

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<sup>19</sup> CBJ Responsive Brief, Exh. 2 at p. 50; CBJ Annexation Brief at p. 46 - 47. (Source: Bill Tremblay, US Forest Service.)

<sup>20</sup> Preliminary Report at p. 27.

<sup>21</sup> CBJ Responsive Brief, Exh. 2, p. 42.

<sup>22</sup> K. Iverson, Alaska CFEC, October 2011, "Analysis of Earnings by Residency of Permit Holders for Select Statistical Areas, Alaska Commercial Fisheries Entry Commission.

The seafood related income earned by Juneau fishermen in the area is important to the Juneau fishermen and their families, and to Juneau businesses. While as a whole Juneau fishermen realize less profit than Petersburg fishermen do from this area, the Juneau-related fishing is an important part of the total economic activity in the contested area, yet is completely discounted in the Preliminary Report. Petersburg-based commercial fishing efforts in the contested area do not occupy so much more of the market as compared to the CBJ-based commercial fishers to justify Staff's final recommendation.

In addition to ignoring the role Juneau-based commercial fishers have in the overlap area, the Preliminary Report is similarly silent as to the fact that the overlap area is populated with sockeye salmon from the Juneau based Douglas Island Pink and Chum's (DIPAC) Snettisham Hatchery. This hatchery—one of the largest smolt facilities in the state—incubates up to 33.5 million sockeye salmon at a time. It is disingenuous to discount the fact that these Juneau-produced salmon represent an enormous amount of economic activity for all fishermen in the area.

**E. Hunting – Commercial and Recreational (3 AAC 110.045 and 3 AAC 110.060)**

The Preliminary Report states that “Petersburg residents also use the area for hunting...”<sup>23</sup> However, there is not a single Petersburg-based guide licensed to lead hunts in the contested area. On the other hand, according to the Alaska Division of Corporations, Business and Professional Licensing, there were eight Juneau residents licensed as big game hunting guides for the contested area in 2011.<sup>24</sup>

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<sup>23</sup> Report at p. 27.

<sup>24</sup> CBJ Responsive Brief, Exh. 2 at p. 37.

It is not just commercial hunting guides who present a stronger connection to the CBJ over Petersburg, it is the recreational hunters as well. Resident hunters using this area for recreational purposes are much more likely to be from Juneau than from Petersburg. According to the Alaska Department of Fish and Game, in the area between Hobart Bay and Tracy Arm, there were 108 Juneau hunters and just six Petersburg hunters between 2006 and 2010.<sup>25</sup>

**F. The Availability of Charter Flight Service (3 AAC 110.045)**

Determining the availability of charter flight service to the contested area is another way the Commission can make a finding that the proposed borough possesses the communication and exchange patterns sufficient to meet the requirements of 3 AAC 110.045(c).

The CBJ presented evidence that between September 2010 and September 2011, based on United States Department of Transportation data,<sup>26</sup> and interviews with air carriers,<sup>27</sup> there were 20 commercially chartered flights originating out of Juneau to Tracy Arm, Endicott Arm, Windham Bay, or other areas north of Hobart Bay; and only one commercial flight originating out of Petersburg. Many of the flights heading in and out of Hobart Bay are due to Goldbelt activity. South of Hobart Bay, the air traffic does become more dominated by Petersburg carriers.

Again, as to this factor, the CBJ presented competing evidence supporting its claim that it has a stronger tie to the contested area than Petersburg, yet this evidence was not considered or addressed in the Preliminary Report.

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<sup>25</sup> CBJ Responsive Brief, Exh. 2 at p. 33 and CBJ Annexation Petition, p. 42.

<sup>26</sup> CBJ Responsive Brief, Exh. 2, p. 54; Annexation Petition at pp. 48 – 49.

<sup>27</sup> Responsive Brief, Exh. 2 at pp. 53 – 54; Annexation Petition at pp. 48 – 49.

**G. Competing Claims of Historical Ties Between the CBJ and the Contested Area were not Considered in the Preliminary Report (3 AAC 110.060).**

The Preliminary Report relies upon a finding that “Petersburg was active in the 1980’s Hobart Bay timber harvest” and “provided supplies and support for the enterprises” as additional support for determining the requirements of 3 AAC 110.060 satisfied.<sup>28</sup> While some of the timber harvesting support did come from Petersburg, the Hobart Bay timber harvest was conducted by Goldbelt Incorporated, the Juneau Alaska Native for-profit corporation. The base of the timber harvest operation was Juneau, and many of the service contracts were with Juneau-based companies.<sup>29</sup> The reason Goldbelt harvested its timber base in Hobart Bay was to engage in economic activities to support Goldbelt shareholders – 1,269 of whom live in Juneau, as opposed to the nine who reside in Petersburg. It is inaccurate and incorrect to characterize Goldbelt’s timber activities as Petersburg-oriented, as the Preliminary Report suggests.

The Report also fails to compare or analyze connections either the CBJ or Petersburg has with respect to other historical ties recognized by the regulation. As outlined in both the CBJ’s Responsive Brief and Annexation Petition, before there was a Juneau, the contested area was the domain of the Juneau-based tribes.<sup>30</sup> The area from Port Houghton to the north is reported to being validly claimed by the Taku and Sumdum tribes.<sup>31</sup> There is no discussion about the ethnic or cultural ties held by either the CBJ or Petersburg with respect to the contested area in the Preliminary Report.

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<sup>28</sup> Preliminary Report, p. 27.

<sup>29</sup> See CBJ’s Responsive Brief, Exh. 2 at pp. 26 – 28; CBJ’s Annexation Petition at pp. 55 – 56.

<sup>30</sup> See CBJ’s Annexation Petition at pp. 58 – 59; Responsive Brief at Exh. 2, pp. 24 – 25.

<sup>31</sup> *Harvest and Use of Wild Resources by Residents of Petersburg, Alaska*, ADF&G. Division of Subsistence, 1988.

**H. Including the Contested Area in the Petersburg Borough is not in the Best Interests of the State (3 AAC 110.065).**

There is nothing in the Preliminary Report explaining the analysis Staff engaged in when applying the requisite standards contained in 3 AAC 110.065 to the contested area. Staff's analysis appears to have been exclusively as it relates to the "outliers" (again, none of whom reside in the contested area.)<sup>32</sup>

The CBJ presented evidence supporting its claim that annexation of the contested area to the CBJ met the standards outlined in 3 AAC 110.195 as the CBJ's current population already supports the provision of limited services to the proposed annexation area.<sup>33</sup> This competing claim was not considered in the Preliminary Report.

**I. Staff's Findings and Recommendations Based on the Natural Geography (3 AAC 110.060)**

The Commission must find that the post-annexation boundaries conform generally to the natural geography. The CBJ provided extensive evidence explaining how its proposed annexation boundaries conformed to the natural geography by using the boundaries of major watersheds in the area.<sup>34</sup> In the Preliminary Report, there is little but a conclusionary statement that as the proposed boundary "follows ridgelines, watersheds, or go across bodies of water, Commerce finds that they conform generally to naturally geography."<sup>35</sup> In reality, there are a number of issues related to the boundaries proposed in the Report:

- Using Point Coke as a boundary corner creates land fractions that are impractical or impossible to survey. It does not seem logical to place an important borough boundary corner on a beach head, as opposed to using

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<sup>32</sup> Preliminary Report at pp. 28 – 29.

<sup>33</sup> Annexation Petition, p. 68.

<sup>34</sup> Annexation Petition, pp. 59 - 64

<sup>35</sup> Preliminary Report, p. 28.

published US coast and geodetic survey points, to create a more carefully defined and surveyable geometry.

- Running a boundary across an unnamed reef means there can be no surveyable monument for use in defining the corner of the proposed borough.
- The proposed borough boundaries meet in an acute angle at Midway Islands making it difficult to tell where the borough ends and begins with common place gear such as a G.P.S.
- There are safety concerns with splitting Holkham Bay between the two boroughs relating to vessel staging near Harbor Island.
- Separating Tracy Arm from Endicott Arm undoes existing management policies for these watersheds and will interfere with long-standing tourism management plans. These watersheds should be kept combined and intact, to honor historic and existing management practices and programs for the area.
- Splitting the Tracy Arm/Ford's Terror Wilderness Area, established in 1980 by A.N.I.L.C.A, under U.S.F.S. management, is counter to the public interest.
- Placing Harbor Island (the island at the mouth of Tracy and Endicott Arms) in the Petersburg Borough is unwarranted. This is an important confluence point controlling the traffic into Tracy Arm, and since the vast majority of the major tourism (and other) traffic for Tracy and Endicott originates or terminates in Juneau, Harbor Island should be part of the CBJ.
- The proposed boundaries offered in the Preliminary Report places a large majority of the available shoreline, a valuable resource both for access and development, with Petersburg. There are approximately 1000 linear miles of shoreline in the contested area. The Preliminary Report proposal assigns 987 to the Petersburg Borough, and only 61 miles to the CBJ. Furthermore, all of the CBJ's 61 miles are in Tracy Arm, a national wilderness area, and are undevelopable.

Given the lack of discussion in the Preliminary Report, it seems this factor was given little to no consideration as it applies to the contested area.

## II. CONCLUSION

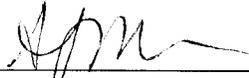
The CBJ has presented evidence supporting its claim that as to the contested area, with the strongest ties being to that area from the southern boundary of the CBJ to Hobart Bay (specifically the south boundary of the watershed that drains into Hobart Bay), it has **more**

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common interests than Petersburg. This contested area should not be included in the Petersburg Borough and should instead be annexed to the CBJ. The LBC has accepted a petition to annex this area to Juneau and we urge the Commission and its staff to recognize the CBJ's significant common interests to this area. Incorporating the contested territory as part of a new Petersburg Borough, based on the reasoning in the preliminary report, would be an abuse of the LBC's discretion.

DATED March 30, 2012.

CITY AND BOROUGH OF JUNEAU



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