



Bristol Bay Area Health Corporation
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Bristol Bay Area Health Corporation is a tribal organization representing 28 villages in Southwest Alaska.

- Aleknagik
- Chignik Bay
- Chignik Lagoon
- Chignik Lake
- Clark's Point
- Dillingham
- Egegik
- Ekuk
- Ekwok
- Goodnews Bay
- Ivanof Bay
- Kanatak
- King Salmon
- Knugank
- Kolliganek
- Levelock
- Manokotak
- Naknek
- New Stuyahok
- Perryville
- Pilot Point
- Platinum
- Port Heiden
- Portage Creek
- South Naknek
- Togiak
- Twin Hills
- Ugashik

Our mission is to provide quality health care with competence and sensitivity.

June 20, 2016

Brent Williams
 Local Boundary Commission
 550 W. Avenue, Suite 1640
 Anchorage, AK 99501-3510

Re: Legislative Review Petition to Annex 396 Square Miles of Water and Three Miles of Islands to the City of Dillingham and Legislative Review Petition to Annex 118 Square Miles of Water and 37 Square Miles of Land to the City of Manokotak

Dear Mr. Williams,

Bristol Bay Area Health Corporation (BBAHC) wishes to go on record with its opposition to the above described proposed annexations. BBAHC supports the staff's recommendation that the annexations proposed by Dillingham and Manokotak do not meet the standards for annexation adopted in regulations by the Local Boundary Commission. In particular, we agree that the annexations proposed by Dillingham and Manokotak are not in the best interests of the state because they each propose to annex all or part of Nushagak Bay. We agree that Nushagak Bay is a valuable regional resource which, in order to serve the state's best interest, must be reserved for the benefit of all residents of the region. These annexations would stand in the way of a regional solution to help pay for necessary governmental services for our people.

We believe it would be in the state's best interest to allow a local task force reasonable time to prepare a report to the region about borough formation within the Western Bristol Bay Region. The first meeting of this task force on May 25, 2016 consisted of representatives sent by:

- *Bristol Bay Native Association;
- *Bristol Bay Economic Development Corporation;
- *Southwest Region School District;
- *Bristol Bay Area Health Corporation;
- *Cites of Dillingham, Aleknagik, Clark's Point, Togiak, Manokotak, New Stuyahok, Ekwok; and
- *Aleknagik Traditional Council, Ekuk Village Council, Clark's Point Village Council, Portage Creek Village Council, Ekwok Village Council, New Stuyahok Traditional Council, Traditional Council of Togiak.

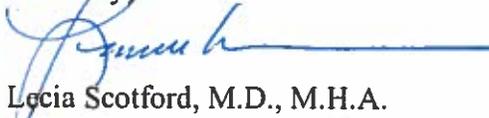
The task force is actively working to include all governmental entities of the region to help us understand the pros and cons of forming a regional government. With the Information provided by the task force, each community will decide whether it would support creation of a borough.

We think the Local Boundary Commission should deny the annexation petitions and let us try this local method before it decides what action it will take in forming a borough in the region. A regional government formed with the consent of those governed will be stronger than one imposed by outsiders.

We urge the commission's staff to recommend a fall back solution if the commission does not agree with staff's recommendation concerning the best interests of the state. We urge the staff to recommend that any annexation of the Nushagak Commercial Fishing District be conditioned on the creation of a tax compact among governments in the Western Bristol Bay Region. The purpose of a compact would be to use the proceeds from raw fish taxes to help all communities of the region, rather than a single city.

Finally, we urge staff to consider recommending to the commission that, if there is to be an annexation of the entire Nushagak Commercial Fishing District, that the boundaries exclude waters on the Eastern side of Nushagak Bay containing set net sites. The purpose of this exclusion of territory would be to allow for future expansion of Clark's Point and the provision of additional municipal services by that city and associated tribal governments.

Sincerely,



Lecia Scotford, M.D., M.H.A.

Executive Vice President / Chief Operations Officer

c: BBAHC Board of Directors
Robert J. Clark, President / Chief Executive Officer
James L. Baldwin, Esq.
City of Dillingham
City of Manokotak