

BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257

June 22, 2016

Tribal Councils
Served by BBNA:

Aleknagik

Chignik Bay

Chignik Lagoon

Chignik Lake

Clarks Point

Curyung

Egegik

Ekuk

Ekwok

Igiugig

Iliamna

Ivanof Bay

Kanatak

King Salmon

Kokhanok

Koliganek

Levelock

Manokotak

Naknek

New Stuyahok

Newhalen

Nondalton

Pedro Bay

Perryville

Pilot Point

Port Heiden

Portage Creek

South Naknek

Togiak

Twin Hills

Ugashik

Local Boundary Commission

State of Alaska

550 W. 7th Avenue, Suite 1640

Anchorage, AK 99501

Members of the LBC:

The following are comments and recommendations from the Bristol Bay Native Association (BBNA) regarding the "***Preliminary Report to the Local Boundary Commission Concerning the Legislative Review Petition to Annex 396 Square Miles of Water and Three Miles of Islands to the City of Dillingham and Concerning the Legislative Review Petition to Annex 118 Square Miles of Water and 37 Square Miles of Land to the City of Manokotak***" released by the staff of the Local Boundary Commission (LBC) on June 3, 2016 .

We agree with the staff's recommendation that the annexations proposed by the City of Dillingham and the City of Manokotak do not meet the standards for annexation adopted in regulations by the LBC. 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 the Nushagak Bay. The Nushagak Bay is a valuable regional resource. In order to serve the State's best interests, it must be reserved to benefit all residents of the affected area, rather than only residents of certain communities. These annexations would stand in the way of a regional solution for necessary public services to benefit all people in the affected area.

We recommend that it would be in the State's best interests to allow reasonable time for the Task Force that was formed specifically to study the feasibility of a regional government in the affected area to complete its work. The Task Force is composed of 22 representatives of municipalities, school districts, tribal councils, and regional organizations in the affected area. This is the first time that we can recall a group of this size and diversity was ever organized to undertake such an effort. The Task Force will prepare a report about borough formation. The Information provided by the Task Force will allow residents in each community to decide whether to support creation of a borough.

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Our recommendations are as follows:

1. The LBC deny the annexation petitions and allow the local Task Force to complete its work. A regional government formed with the consent of local residents will be much stronger than one forced on them by the State or outsiders.
2. The LBC staff drafts an alternative solution in the event the LBC disagrees with staff's recommendation of what's in the best interests of the State.
3. If any annexation of the Nushagak Commercial Fishing District is approved that it 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 serve all communities in the affected area, rather than a single city.
4. If there is 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 would allow for future expansion of Clarks Point and the provision of additional municipal services by the City of Clarks Point and the tribal government.

Thank you for the opportunity to provide these comments and recommendations on this important matter.

Sincerely,



Ralph Andersen

President & CEO