

Alaska Boundary Commission  
Alaska Department of Commerce, Community and Economic Development  
550W. 7<sup>th</sup> Ave. Suite 1650  
Anchorage, Ak. 99501

To whom it concerns,

I am writing to offer my comments on the proposed Xunaa borough.

First and foremost, it appears that the proposed borough does not meet the criteria of a borough, **3AAC110.050**, as the population is less than 1000 people. Therefore the Boundary Commission should reject this proposal.

If the Commission were to make an exception for some reason, it should be adjusted greatly.

I am a commercial fisherman from Gustavus and have fished the area for over forty years. I disagree with granting this proposed borough from a commercial fishing standpoint of taxation. Our fisheries are already taxed and the idea that the borough would further tax our fish is frustrating to say the least. We are food producers harvesting the resources of the State in accordance with our issued state and federal permits. We are taxed on our catch. The money that is generated from these taxes is used in many ways. From ASMI, to fisheries enhancement, observer programs and law enforcement, to funding docks and maintenance to name a few. We, as commercial fishermen get taxed and we get representation from that tax. The proposed taxation from the proposed borough does not go toward any of these, rather just to the borough. Taxation with no representation.

The amount of money that would be generated from this tax is staggering. All the troll salmon from the Fairweather grounds and the outer coast as well as the inside, seine fish from Tenakee Inlet and Lisianski Straights, and halibut from 3A and 2C, along with Tanner, King, and Dungeness crab as well as shrimp and other fisheries. Millions of pounds of seafood are caught and/or transported through the proposed borough. This tax would amount to hundreds of thousands of dollars to the borough off the backs of hundreds of individuals who will receive nothing in return.

I echo my wife's comments (Naomi Sundberg), the City of Gustavus, and many others who oppose this borough.

Again, I urge the Commission to reject Hoonah's proposed Xunna Borough.

Further, if the Commission is inclined to make an exception to **3AC C110.050**, it should do so in a greatly reduced area. The Commission should reduce the area to reflect Hoonah's interests only, as the other communities in the area do not share the same interests of Hoonah. Maybe to the waters of Port Fredrick.

Thank You for your considerations,  
Tom Traibush  
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