

February 24, 2024

Local Boundary Commission  
550 @ 7<sup>th</sup> Ave. Suite 1650  
Anchorage, AK 99501-3510  
Re: Xunaa Borough Petition

Thank you for this opportunity to speak out in opposition to the City of Hoonah proposal to dissolve the City of Hoonah and reach across Icy Straits to incorporate 6.6 million acres of land and waters into a new borough. Such a Borough does not meet the plain meaning of the statutory intent for borough formation. Furthermore, this proposal would harm neighboring communities and their chosen forms of local governance by interfering with revenue sources such as payment in lieu of taxes that fund our local roads and programs.

We respectfully ask that the Local Boundary Commission deny the City of Hoonah's request. Very simply the proposal does not meet any of the basic statutory requirements for forming a new borough. It is lacking in every intent. 1. The population of the area is NOT interrelated or integrated; 2. The boundaries do not conform in a natural geography for development or provision of municipal services; 3. There is zero economic advantage to the outlying communities; and 4. There is no need for transportation facilities to be changed in any way from what exists today.

Sec. 29.05.031. Incorporation of a borough or unified municipality.

(a) An area that meets the following standards may incorporate as a home rule, first class, or second class borough, or as a unified municipality:

- (1) the population of the area is interrelated and integrated as to its social, cultural, and economic activities, and is large and stable enough to support borough government;
- (2) the boundaries of the proposed borough or unified municipality conform generally to natural geography and include all areas necessary for full development of municipal services;
- (3) the economy of the area includes the human and financial resources capable of providing municipal services; evaluation of an area's economy includes land use, property values, total economic base, total personal income, resource and commercial development, anticipated functions, expenses, and income of the proposed borough or unified municipality;
- (4) land, water, and air transportation facilities allow the communication and exchange necessary for the development of integrated borough government.

(b) An area may not incorporate as a third class borough.

We wish to echo the heartfelt and well researched testimony of other citizens of this affected area that have been submitted to you in very loud and uniform testimony in opposition to the Xunaa proposal. In contrast, I do not see a commensurate vocal welling of support for this proposal and in conclusion, we ask the Local Boundary Commission to please deny the City of Hoonah's request.

Respectfully,

Jim and Melanie Lesh  
Gustavus, Alaska 99826