Local Boundary Commission
Alaska Department of Commerce, Community and Economic Development
550 W. 7th Ave, Suite 1650
Anchorage, AK 99501

February 20, 2024

Local Boundary Commission,

I am submitting this letter as opposition to the Xunaa Borough formation.

As a resident and property owner in Tenakee Springs since 1981 I feel that the proposed boundary of the proposed Xunaa borough would completely encompass the City of Tenakee Springs and would severely affect our economic, subsistence and cultural use of Tenakee Inlet and the surrounding lands.
This would also apply to the communities of Gustavus and Pelican by creating exclusion zones around those communities. This would prevent each of our communities from expanding their own boundaries at a future date to allow for "reasonable predicable growth" which violates provisions in 3 AAC.110.130(c).

The size of the proposed borough is excessively large while failing to meet the requirements of 3 ACC.110.065(2) in that a new borough would not reduce the number of local governments nor consolidate school districts. See 3 110.065 and 3 ACC 110.135(2).

In the petition Exhibit K, Tlingit and Haida Land Rights and Use, page 60 it states "there is universal agreement that the Hoonah territory did not extend beyond Point Augusta on Chichagof Island, though a Takdeintaan man used False Bay for hunting and trapping and Hoonah Natives who were related used Freshwater Bay with permission of the Natives who claim that territory. Nor did the Natives use any of the Mansfield Peninsula on Admiralty Island."
So my question is why are they trying to include Funter Bay in the new borough. It was never in their ancestral lands area, only used for subsistence.
There is not much of a tax base in Funter Bay as most of the structures there are summer homes of Juneau based residents.

In the petition, Exhibit E section page 3 of 35 (i) "The Proposed Borough Entirely Comprises the Ancestral Lands and Principial Subsistence Areas of Huna Tlingit", fourth bullet point down "The southern boundary runs from Point Urey directly eastward across the upper portion of Tenakee Inlet, reaching Chatham Strait at Point Augusta. Id. At 60 and From Point Augusta, the border runs northward to include Point Coverden and all of Excursion Inlet. Id. At 54,60 and Chart 8. And, as we shall see, the reach of the Tribe's traditional subsistence harvest includes portions of Admiralty Island's Mansfield Peninsula."

Seems to be conflicting information presented in their petition.

So why is the proposed borough encompassing all the lands right up to the City of Tenakee city boundary's, all the lands around Freshwater Bay and all the way to Chatham Straight?
There is nothing there for a tax base.

Would like to see the boundaries moved north so that none of the watersheds or waters of Tenakee Inlet from the mouth to the head of the Inlet are included in the proposed Xunaa Borough.

Would like to see Freshwater Bay and its surrounding land areas excluded from the new borough also.

3 ACC.110.090(a) specifies there must be reasonable need for a local government where residents may be reasonably expected to receive benefit of services and facilities. Yet the residents currently outside of the city limits of Xunaa apparently don't see a need for services and don't expect to get much in the way of services as a result of borough formation. According to the petition proposed new residents want limited government intrusion recognizing they will receive limited services.

Much of the administrative code about borough formation concerns providing essential services. The petition fails to meet this requirement and apparently that by not including Tenakee Springs, Pelican and Gustavus would eliminate the problems with meeting the requirement of this statute.

The majority of the proposed lands in the proposed borough have nothing on them. There is not much to produce a tax base, even with the proposed 6 months a year 1% taxation.

The proposed Xunaa Borough is too large in land area and needs to be scaled back. The boundaries of the proposed borough must not interfere with the potential for Tenakee Springs, Pelican and Gustavus to grow or to have a say in the management of the lands and waters important and close to our homes and way of life.

Thank you-

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