

I am a Haines resident who spends two or more months each winter at our Tenakee cabin, and I oppose the creation of a new borough that would give jurisdiction to over 10,000 acres above and beyond the City of Hoonah's current 7 acres.

In order to approve the new borough, the LBC must find that the petition satisfies the "Need" requirement of 3 AAC 110.090. Essentially, the petition seems to be more about grabbing mostly uninhabited land than providing required services. Administrative code places a clear priority for a newly formed borough to provide essential services such as education, public safety, land use regulations and public health and sanitation services (see, for example 3 AAC 110.990(8)(B) and 970(b).) Yet, the petitioner admits that very little in the way of services will be provided, or are even desired (see, for example, Petition at pages 8, 9, and 30).

The claim of historic use by native peoples is totally irrelevant to this petition, and should have no power to sway. It is not a tribal entity that proposes to incorporate this acreage into its jurisdiction, but a city government that represents both natives and also non-natives who have no historic use of the area.

Most of the lands the petitioner requests to be included in a new borough are unpopulated and are already administered by other entities such as the Forest Service and Sealaska. 3 AAC 110.130(c)(2) seems to prohibit including large unpopulated areas such as these.

As a part time Tenakee resident and property owner, it is important to me that the Indian River hydro project be specifically excluded from the proposed borough. I would also like to see some additional breathing room around the current City of Tenakee so that the city has the opportunity for future expansion as afforded by 3 AAC 110.130(c)(1). I would imagine the other exclusion zones of Gustavus and Pelican would also like some breathing room.

Finally, Hoonah fails to meet the recommended 1,000 resident threshold for borough formation. The most recent population trend is downward from 931 residents in the 2020 census to 917 in 2022 (according to the February 9, 2023 LBC Informal Review). It seems reasonable for the LBC to delay action until such time as Hoonah can meet that minimum population threshold.

Thank you for the opportunity to comment.

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