

From: [Whitney Rapp](#)
To: [Commission, Boundary \(CED sponsored\)](#)
Cc: [Smith, Jedediah R \(CED\)](#); clerk@gustavus-ak.gov
Subject: Xunaa Borough Proposal comments
Date: Thursday, February 29, 2024 4:06:50 PM

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Dear Sir or Madam:

As a resident of Gustavus, Alaska, I am writing to express my concerns over the Xunaa Borough Proposal.

I appreciate the time that Jedediah Smith took to explain the process, as well as the time invested by many of the regional governments.

I think first and foremost, this proposal is NOT addressing areawide and statewide needs. It effectively makes a much larger geographic area for the City of Hoonah at the detriment of all other communities with moderate populations and services excluded. Hoonah's taxable income is likely to increase; however, the outlying areas are not apt to see any services or benefits, which is effectively taxation without representation.

Technically, the boundary has not created "donut hole" enclaves, but in reality, several communities would be left as Unorganized Borough "islands." Other communities, like Gustavus, Pelican, and Tenakee Springs, are currently unable to judge how greatly they will be negatively affected financially. How will residents in adjacent lands and waters be taxed? How will funds like PILT and Road Receipts be affected? What is the negative areawide and statewide burden to the excluded areas that could see most of their surrounding currently unorganized borough lands and waters removed? If current revenues to the excluded communities drops, how much more will the state government have to provide for local services, like roads, schools, and emergency response (3 AAC 110.065)?

Currently, our communities are not interrelated and integrated regarding social, cultural, and economic activities. We do not have a transportation network that facilitates working with neighboring communities. At best, our commonality and hub is Juneau. The proposed geography leaves the outlying areas still in the Unorganized Borough economically and geographically trapped for their future.

The enormous land area encompassed by the proposed Xunaa borough does not appear to meet the needs of providing volunteer services, such as fire departments or other emergency services, throughout the whole geographic extent. Would Xunaa borough be prepared to respond to a mass casualty event aboard a Cruise Ship in their boundary? Who would bear that burden?

I have significant concerns on how the proposed borough would receive entitlement lands from the state as so little state lands exist (under 5000 acres by all agencies including Mental

Health). Gustavus has far more state lands (more than 15,000 acres, but I think some of that is not fully titled to the State), and I have concerns that adjacent lands could be opened up for selection by Xunaa borough, which I strongly oppose.

For these reasons, I encourage a DRASTIC reduction in the geographic extent for Xunaa's borough to encompass lands and waters where it is reasonable for them to provide services to their taxed constituents and not encroach on lands/waters settled by other communities. I support the [City of Gustavus, Alaska Resolution CY24-05](#).

Sincerely,

Whitney Rapp
Gustavus, AK