Natalie Landreth

From:	Natalie Landreth
Sent:	Friday, March 30, 2012 2:43 PM
To:	'jtorgerson@akredistricting.org'; 'rbrodie@akredistricting.org'; 'mgreene@akredistricting.org'; 'jholm@akredistritcting.org'; 'pmcconnochie@akredistricting.org'
Cc:	'April Ferguson'
Subject:	BBNC comments to Redistricting Board

Redistricting Board:

Ordinarily BBNC would send a more formal letter but, given the time constraints, we have decided to submit some interim comments by email. Please forgive the informality.

We appreciate the hard work the Board has undertaken this week and seeing all the various permutations and their respective drawbacks has made it clear what a difficult task you face. We also appreciate that you are mindful of the concerns we and many other Native organizations and corporations raised in our *amicus* brief before the Supreme Court. The Native incumbent issue is important to us because our chosen representatives, especially longstanding ones, have a achieved a level of seniority and expertise that renders them invaluable to the Native community. To lose them simply because of an avoidable pairing would be a disaster for the rural caucus. In any event, we wish to make only one comment relative to this issue and this is that the term "Native incumbent" is somewhat of a misnomer because in reality the protected category is "Native-preferred incumbent," meaning the incumbent does not have to be racially Alaska Native. Under this definition, which is found in a case called *Uno v. City of Holyoke*, representatives such as Bryce Edgmon and perhaps even Senator Gary Stevens qualify as "Native preferred candidates." Please keep this in mind.

With respect to the maps currently under consideration, the first comment we would like to raise is the strange trend of leaving the North Slope and Arctic boroughs entirely intact in favor of only splitting more southern regions like Calista and BBNC. The maps presented by the Board seem to view the northern region as sacrosanct and have not considered options that split those boroughs, while all others seem to be fair game. Calista submitted at least one map that seems to break up the northern regions and it does not seem to have been considered as an option.

Similarly, the issue of pairing Senator Hoffman has come up several times, but no other rural Senate pairings seem to be on the table. This seems very curious and has aroused speculation that Senator Hoffman may be the focus because of political considerations. We hope that this is not the case, but this is how it is being viewed by some spectators including BBNC.

Finally, we understand that there have been some software problems with AFFR's 6th Adjusted Plan, but we respectfully request that you closely examine the benchmark for that third effective Senate seat because we have done some hand calculations that indicate your conclusion that the third Senate seat is only 39% Native may not be correct (we came up with 43%). This plan, if

that third seat can be raised above 42.1%, presents a very attractive option since it does not require a Bethel-Anchorage pairing or possibly non-contiguous Senate pairings (we refer to 37 and 38 that jump over 36 in the 3/30 plan). If those numbers bear out, we believe a Bethel/northern Mat-Su pairing that excludes Wasilla would be a very attractive option and more likely Constitutional than the Board's two current options. To that end, we encourage you to keep the record open to allow consideration of the AFFR plan. Moreover both the AFFR and RIGHTS plans should be sent to Dr. Handley for VRA compliance evaluation.

We may make further comments. Thank you for your consideration.

On behalf of Bristol Bay Native Corporation,
Natalie Landreth

Natalie Landreth
Senior Staff Attorney, Native American Rights Fund
801 B Street, Suite 401
Anchorage, Alaska 99501
ph: (907) 276-0680
fax: (907) 276-2466
email: landreth@narf.org