

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS**

In Re 2011 Redistricting Cases)
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Superior Court No. 4FA-11-2209-CI

**MEMORANDUM IN RESPONSE TO COURT’S ORDER RE
BOARD’S NOTICE OF COMPLIANCE**

In its April 12, 2012 order, the court directed the parties and amicus curiae to address the following issues:

- (1) Whether the Board followed the Hickel process as directed by the Alaska Supreme Court?
- (2) Whether deviations from the Alaska Constitution are justified by the Voting Rights Act?
- (3) Other matters that the plaintiffs and amicus curiae feel are appropriate to address.

RIGHTs Coalition will address only the first issue listed by the court.

COMPLIANCE WITH THE HICKEL PROCESS

The Supreme Court stated in paragraph 6 of its Order of March 14, 2012, “It is undisputed that the Board began redistricting in March and April of 2011 by focusing on complying with the Voting Rights Act, thereby ignoring the process we mandated in *Hickel*.” What the court requires is that the Board first draw a reapportionment plan based on the requirements of the Alaska Constitution and then test that plan against the Voting Rights Act (VRA). Requirements of the Alaska Constitution may be minimized only where that is the only means available to comply with the VRA.

The Board began its process on the remand on March 26th and at that meeting, as shown

by the transcript attached as Exhibit B to the Board's Notice of Compliance, Board counsel explained the Hickel process. But the Board clearly did not follow that process. Instead, in the succeeding days the Board developed a total of 4 plans that were designated as Hickel plans. All of these plans were variations of a Hickel template adopted by the Board on March 27. That template in turn was developed by simply taking the districts from the proclamation plan that the board determined had not been challenged or, if challenged, had been approved by the court. The problem with that line of reasoning is that the Supreme Court ruled that because the Board had not followed Hickel, it was not possible for the Board to argue that the Proclamation Plan's constitutional deficiencies were, "necessitated by Voting Rights Act compliance, not can we reliably decide that question."¹ No court has ruled finally on the validity of the Proclamation Plan and the record on remand does not demonstrate that the Board devoted any effort to reviewing its work with just the Alaska Constitution in mind. Rather, the record demonstrates that the Board devoted much of its time to determining the minimum it could do to satisfy the remand.

An excellent example of this is the discussion of Southeast Alaska that occurred at the March 27 Board hearing. Mr. Whilte was asked about Southeast Alaska and he responded that since it had been declared constitutional there was no need to revisit it unless the Board wanted to. This position ignores the fact that this court denied compactness challenges to districts in Southeast based on the understanding that an influence district was required.² We now know that that understanding was not correct, and as this court stated, "For present purposes, any reviewing court needs to be aware that this court denied compactness challenges to the districts in Southeast based, in part, upon the argument that an 'influence' district was required. Appendix A. No.3. It is not clear whether the court would have reached a different conclusion if this information had been fully litigated on that issue."³ It seems clear, under the terms of the remand that the board was required to revisit Southeast starting from the requirements of the Alaska Constitution instead of the VRA, particularly in view of the fact that one of the supposed VRA requirements was no requirement at all.

¹ Order77, Paragraph 7

² Memorandum Decision and Order
Fn 106

³ id

The Board initially took the position that it would not receive any input from the public but then did accept maps from RIGHTS, AFFR and Calista, all on March 28. However the Board refused to hear any testimony from the interested parties. Instead, on March 29, the Board convened at 10:01 am and briefly discussed a time line to get its work done and recessed at 10:27 am to allow the staff and counsel time to prepare a report for the Board on the plans that had been submitted. The Board reconvened at 2:40 pm, just over 4 hours after the recess and heard a report from Mr. White and at least one other staff person on the public plans that had been received the day before. The RIGHTS plan was the first plan discussed. The discussion takes place beginning on page 23 and ends on page 38.⁴ The only reference to input on the plan is a letter from Mr. Lawson to the Board, but no indication of what the letter says, or that any member of the Board has seen the letter.

Mr. White's begins by stating that the only way to follow the *Hickel* process is use the Board's *Hickel* map. However, the *Hickel* process is just that, a process, not a map.

It is true that the Board had reviewed four alternatives prepared by staff and adopted one of them as a beginning point for its discussion, but the map they adopted (*Hickel* 1) was simply a map of districts they determined had not been challenged or, if challenged, had been affirmed and so were constitutional. This ignores the undisputed evidence that the board drew their Proclamation Plan with the VRA as its focus, not the Alaska Constitution. Nothing the Board did in adopting its so-called *Hickel* plan cured that defect. It never took even a "soft look" at those districts without VRA uppermost in its thinking.

In any event, the appropriate question when evaluating either Board plans or public plans is whether or not the plans are developed using a *Hickel* process, that is with reference to Alaska Constitutional requirements, and then that product is tested against the requirements of the VRA. The Board continues to do it backwards.

Mr. White, after brief review, advised the board that there were a number of reasons to reject the RIGHTS map; however these alleged problems do not stand up under scrutiny. The entire time spent on the RIGHTS plan on the March 29 hearing consumed 15 pages of transcript. It could not have taken more than 15 or 20 minutes and Mr. White and the board continually

⁴ Exhibit B to the Boards Notice of Compliance
Transcript of March 29 hearing.

mixed VRA requirements and constitutional requirements during the discussion. For instance, on page 24 Mr. White has an objection to a “Bethel house district”. It is difficult to respond to this objection but it appears that he is actually talking about District 38 which is the Mountain Village House District.⁵ Bethel is not in that district. In any event there is an objection even though he acknowledges that it exceeds the voting age population requirement under VRA set by the Board’s expert Lisa Handley. As shown by Leonard Lawson’s affidavit, this district has also been reviewed and approved by Professor Arrington, a recognized voting rights expert who found it compliant with the VRA. Indeed the whole Coalition plan was determined to be compliant.⁶

On page 26 at line 11, Mr. White objects to the fact that Representative Thomas is paired. To begin with, avoiding pairing of incumbents does not appear on the Board’s initial list of guidelines and it is not in the state constitution. The primary focus at this stage is drawing a map focused on the requirements of the state constitution and then testing that plan against the VRA. The Southeast influence district that was included in the Board’s proclamation plan, and remains in the Amended Proclamation Plan, is not required. Under the circumstances, Representative Thomas is not entitled to be protected any more than any other incumbent; Senator Coghill for example, is paired with Senator Thomas. Also, Representative Miller is paired with Representative Wilson. Each of these pairings could have been avoided with slight modifications that the Board chose not to make.

The next objection is that District 39 is not compact and not socio-economically integrated. District 39 is a large district and given the loss of population in the rural areas of Alaska, it is extremely difficult to draw more compact districts. Furthermore, as shown by Mr. Lawson’s affidavit, the Yukon River has integrated that area as a vehicle for transportation and commerce since before the founding of the United States.⁷ In fact, the Board’s own Hickel 1 Plan has a similar District 39 that it determined met constitutional requirements.

House district 38, according to Mr. White on page 28, is not socio-economically integrated. Once again he refers to this as the “Bethel” district but Bethel is not in this district,

⁵ Affidavit of Leonard Lawson attached as Exhibit 1 at paragraph 13

⁶ id at paragraph 9

⁷ id at paragraph 15

Homer is and the district is socio-economically integrated. Mr. Lawson's affidavit shows that a significant number of Homer boats fish in Bristol Bay, there are six flights a week from Homer to Aniak and Homer serves as a major hub for fuel transportation into the rural areas of Lake and Pen borough.⁸ There is also an objection to compactness because the district stretches across water. Districts containing large areas of water not connected to land are to be avoided, but our Supreme Court has never held that a district cannot cross water and indeed there are similar instances in the Board's Amended Proclamation Plan; Nanwalek is moved into a district where it is connected only by water. Meeting the primary constitutional requirement of one person, one vote, in a state as large and sparsely populated as Alaska, with its irregular coast line, and a land mass broken by several large rivers, mountain ranges and drainages, will require crossing water from time to time. There was also discussion concerning the number of times that the Kenai Borough is divided. The Borough is in fact divided three times in the RIGHTs plan but it is important to note that the remaining segments maintain the ability to secure representatives to which they are entitled⁹. The dilution of voting strength and proportionality arguments each lack strength under those circumstances.

Mr. White objects to lack of compactness in the Aleutian district, but there is no question of socio-economic integration, and the chain is what it is, long and connected only by bodies of water. In this connection, it is interesting to note that the East Island Borough has written the Board in support of the latest iteration of the RIGHTs map, submitted to the Board on March 28. I do not believe that letter or any other submission from third parties, has ever been discussed in the Board's deliberations. A copy is attached as Exhibit 2.

On page 31 Mr. White raises compactness concerns over House District 36. This is in fact the Bethel District. As shown by the affidavit of Mr. Lawson,¹⁰ it was drawn with input from Professor Charles Walkie of UAF in order to promote better socio-economic integration among the many Yupik speaking populations in the district. There are strong cultural ties throughout the district and reliance on Bethel as a transportation hub.

⁸ id at 16

⁹ id at paragraph 23

¹⁰ id at paragraph 18

White's next objection is to the lack of socio-economic integration in district 31. However, tourism and fishing, both commercial and sport bind this district together and there are daily flights north and south through Yakutat and Cordova to and from Anchorage. State highways and the Alaska Marine Highway provide regular transportation to all areas.¹¹

There is an objection to lack of compactness in district 18, but as shown by Lawson's affidavit, the area in question was put in District 18 to avoid the pairing of Republican house members. This lightly populated census block could easily be moved to the adjoining district.¹²

House district 10 was, again according to Lawson's affidavit, drawn the way that it is in the RIGHTS plan in order to have one senate district entirely within the city of Fairbanks and break the city boundary only once.¹³

There is an objection to lack of compactness and socio-economic integration in district 5.¹⁴ However, as Lawson points out in his affidavit, the Denali Borough was ruled as non-integrated with MatSu in both 2002 and in 1992; it was ruled as being integrated with the Fairbanks borough and so was placed in a Fairbanks district. Valdez strongly argued that it was integrated with the Fairbanks Borough.

Finally, on page 34 of the March 29 transcript, Mr. White states that proportionality in the Kenai Borough may be compromised. Violations of proportionality dilute the worth of particular person's vote. They are an equal protection violation. Actually, as indicated above, the Kenai Borough is divided three times in the Coalition plan and this, in fact, raises concerns about vote dilution. However, Mr. Lawson points out in his affidavit the Kenai has the majority in three house districts to which it is entitled and is thus able to secure the result it desires. It is not a VRA concern that prompts the splitting of this borough, it is a one person one vote concern. The Kenai Borough is bordered by four boroughs (MatSu, Lake and Pen, Anchorage and Kodiak). Three of those boroughs were in need of population sufficient to bring deviation within 10 per cent of the plan as a whole. The Kenai was the sole area that was relatively integrated

¹¹ id at paragraph 19

¹² id.at parageaph 20

¹³ Id at paragraph 21

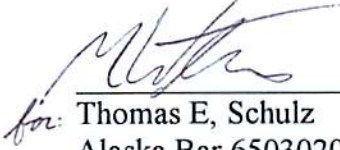
¹⁴ Exhibit B to Board Notice of Compliance, March 29 hearing at page 33

with each of areas needing population and also could give population while still maintaining control over the 3 house districts to which they are entitled.¹⁵

CONCLUSION

The process in reviewing the other plans did not differ in significant detail from that discussed above and the entire process demonstrates the failure of the board to engage in a meaningful *Hickel* process. The latest iteration of the Coalition map, given to the Board on March 28, is based on a clear understanding of and application of the *Hickel* process. Alaska Constitutional requirements were minimized only when necessary to meet the VRA requirement and a qualified expert contacted by Coalition has said the plan complies with VRA. Coalition urges the Court to set a hearing to explore Board compliance with the *Hickel* process and order the Board to adopt a *Hickel* compliant plan, such as the Coalition plan or adopt one itself.

Respectfully submitted this 16th day of April, 2012


for: Thomas E, Schulz
Alaska Bar 6503020
Attorney for RIGHTS Coalition
715 Miller Ridge Road
Ketchikan, Ak 99901
(907) 247-1016

m. Wenstrup
ABA 0505012

¹⁵ Lawson Affidavit at paragraph 23

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of April, 2012, a true and correct copy of the **MOTION AND MEMORANDUM IN SUPPRT OF LEAVE FOR RIGHTs COALITION TO PARTICIPATE AS AMICUS CURIAE and MEMORANDUM IN RESPONSE TO COURT'S ORDER RE BOARD'S NOTICE OF COMPLIANCE** was sent by electronic mail to:

Office of the Clerk, Fairbanks	4faclerk@courts.state.ak.us
Karen Erickson	kerickson@courts.state.ak.us
Kelly Krug	kkrug@courts.state.ak.us
Michael White, Esq	MWhite@PattonBoggs.com
Michael Walleri, Esq	walleri@gci.net
Thomas Klinkner, Esa	tklinkner@bhb.com
Jill S. Dolan, Esq	cklepaski@co.fairbanks.ak.us
Margaret Paton-Walsh, Esq	Margaret.paton-walsh@alaska.gov



Thomas E. Schulz

**IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS**

In Re 2011 Redistricting Cases)
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_____) Superior Court No. 4FA-11-2209-CI

AFFIDAVIT OF LEONARD LAWSON

STATE OF ALASKA:)
)
THIRD JUDICIAL DISTRICT)

Leonard Lawson, being first duly sworn on oath, states as follows:

1. I have previously testified herein and my qualifications are a matter of record. I have been working with the RIGHTs Coalition (Coalition) for several months to assist in the drafting of a redistricting plan that complied with the requirements of the Alaska Constitution to the maximum extent possible while at the same time being in compliance with the federal Voting Rights Act.
2. Coalition is an unincorporated group that was formed primarily for citizen education and to aid in the formation of a new proclamation map that encouraged and empowered citizens to participate in the electoral process. From the beginning we operated on the premise that unnecessary changes to the electoral process fostered greater voter apathy and made the process of citizen involvement harder. Coalition, therefore, sought to maximize state constitutional compliance in the maps it drew,

while also trying to change existing districts as little as possible, so that communities that had been together in previous districts could continue to be together in the new plan, if possible.

3. These two objectives, creating the most state-constitution-compliant map and limiting changes from the current benchmark map, were treated as going hand in hand. The current map was considered to be constitutional when it was created so limiting deviation from the current plan was seen as a way to create a map that is compliant with the state constitutional requirements.
4. We understood the complicating factor that the federal Voting Rights Act (VRA) is the law of the land, but we also understood that the Redistricting Board would need to draw a map that met the requirements of the Alaska Constitution and then test that plan against applicable federal laws, deviating from the Alaska constitution only to the extent necessary to comply with the federal law.
5. The Coalition adopted, for the most part, the same guidelines as the Redistricting board with two major exceptions. First, the Coalition placed primary emphasis on the requirements and considerations of the State Constitution over and above any Federal law. The idea in this was that the State Constitution expressly authorized greater protections for the citizens of Alaska as a whole than do federal laws. For example, the State Constitutional requirement for socio-economic integration cannot, to my knowledge, be found in federal law. Second, from the very beginning Coalition placed an emphasis on maintaining local government boundaries. This was seen as something that not only maximized socio-economic integration but also further empowered citizen participation in the process by not unnecessarily fracturing their voice and representation in the state legislature.
6. The coalition actively sought advice from many boroughs in the State of Alaska. Where possible, suggestions from boroughs have been directly incorporated into our map as the process proceeded. We are proud of the fact that both the Fairbanks North Star Borough and the Matanuska-Susitna Borough submitted statewide plans to the board using an iteration of our map as a basis. Furthermore the City of Petersburg has used an iteration of our map in court filings and the Aleutians East Borough sent a

- letter to the Board endorsing our final map submitted to the Board on March 28, 2012. That map, entitled “W plan March 28” is the culmination of months of work that sought to apply all that we had learned from speaking with citizens and working with local governments. It also represents our effort to make the map VRA compliant
7. The most interesting part of the process as a whole was the discovery that state constitutional requirements often supplemented the requirements of federal laws like the VRA. Rather than acting as an opposing consideration, many times districts drawn primarily to promote state constitutional requirements ended up creating very compliant VRA districts.
 8. District 36 in “W plan March 28” was such a district. The primary reason for its shape was to maximize socio-economic integration and equal protection consideration arising out of the fact that the district has a high number of villages where Yupik language is spoken and therefore has more challenges concerning ballot access. This area had already seen legal challenges to the state asking that greater effort be placed on translating election ballots for Yupik speakers. We tried to balance competing requirements of the state constitution involving equal protection, socio-economic integration, and compactness. The balancing of these concerns makes attainment of the ideal on any one of those issues nearly impossible. But this is caused by an attempt to balance competing state constitutional requirements and not federal law.
 9. We understood that the map needed to comply with the VRA and Professor Arrington, a court recognized expert on the VRA, has opined that the “W plan March 28” in fact does comply with the requirements of that statute.
 10. Coalition had been trying to arrange opportunities for interested parties to offer testimony to the Board after the remand. The process had been very open to public participation prior to adoption of the Proclamation Plan and we were hopeful it would continue to be. However, the Board determined early on that public participation would not be allowed. Coalition and at least two other groups did submit final maps to the Board and I was able to submit the letter attached hereto as Exhibit A. Our plans were submitted on March 28 and the Board in fact considered them on March

- 29th, rejecting all the plans. None of the groups submitting plans were given the opportunity to answer questions or provide additional information to the Board.
11. The Coalition plan was discussed first on March 29th in a report given by Mr. White, counsel to the Board. There was a recess of approximately 4 hours between the morning session which ended at approximately 10:25 am and the afternoon session which convened at about 2:40pm.
 12. The first objection to the Coalition plan involved our compliance with the *Hickel* process. The Board was told and apparently agreed, that the only way to comply with *Hickel* was to use the map adopted by the Board. First, we were never made aware of that the Board considered that a final map and, second we considered the process followed to arrive at our "W plan March 28" to be fully *Hickel* compliant. This plan is a direct descendant of our first plan, which admittedly did not comply with the VRA, but did comply with the State Constitution.
 13. Exhibit B to the Notice of Compliance submitted to the court is a verbatim transcript of the Board hearings after remand. The March 29th transcript contains the discussion of all the plans submitted on March 28th. There was no opportunity for public comment. At page 24, line 14 there is a discussion of a Bethel House District. The discussion centers on VRA requirements. To begin with, this is not the Bethel District. Mr. White is actually referring to District 38, which is the Mountain Village House District, and White acknowledges that it is VRA compliant but still lists this factor as an objection. This district is approved by both Professor Arrington.
 14. On page 26, line 11 there is a discussion of the fact that Representative Thomas is paired, however, Thomas is in an influence district that we now know is not required to be protected. District 5 is not an effective district and Thomas is only sometimes the native candidate of choice there is no reason to violate the State Constitution to draw non-compact districts to meet a requirement that is not in the VRA
 15. The fourth objection is that District 39 (Nome to Eagle) is not compact and not socio-economically integrated. The Yukon River integrates this district. The Yukon River has been used for transportation and commerce from before the founding of the United States. Trading trails, from Kaltag to Nome connect the Bearing Sea Coastal

areas to the interior river section. 230 miles of the frozen Yukon River and trails from Kaltag to Nome were used for the historic "Great Race of Mercy" to deliver diphtheria anti-toxin to Nome. Kaltag was a key point of the Seward to Nome mail route which connected several villages on the Yukon River with Nome.

16. House District 38, referred to as the Bethel District by Mr. White, is in fact the Homer District. The contention, on page 28, line 12 is that it is not socio-economically integrated. However, Homer has flights six times a week to Aniak and there are a large number of Bristol Bay permits that fish out of Homer. Homer serves as a fuel transportation hub into the rural area of the Lake and Pen Borough. White also objects as to compactness because the district stretches across water. However, the "stretch" is not a long one, there is frequent travel to and fro across the particular body of water, and most important, the preference for compactness and contiguity that does not involve bodies of water is a relative one, given the size, huge coast line and rugged interior of Alaska which is also fragmented by mountain ranges, rivers and drainages and a small population that is frequently isolated in small communities. This district does have the appearance of perhaps being unconstitutional on socio-economic integration grounds. Yet when examined in detail this district does meet state constitutional requirements as the need to balance "one person one vote" and the irregular geography of Alaska is considered. This district has the added benefit of satisfying key Voting Rights Act requirements and leads to the plan as a whole being considered compliant with the VRA by Professor Arrington.

17. There is an objection to the Aleutian Chain District on Compactness grounds. However, this district is definitely socio-economically integrated and, as the letter from the Aleutian East Borough shows, they, in fact, support the plan, as opposed to the Board's plan.

18. At page 36, line 6, White raises concerns over compactness in House District 36. This is actually the Bethel House District and it was drawn with input from Professor Charles Walkie of UAF in order to better provide socio-economic integration. The villages in this district have strong Yupik speaking populations and have strong cultural ties. This district as drawn, strives to place as many Yupik speaking villages

in one house district to maximize equal protection of a language minority. The Wade Hamilton area is culturally rich but faces economic and political disenfranchisement challenges. It has been the subject of multiple voting rights challenges and faces a great need for translation services and has ballot access concerns. It is placed with Bethel as its center because of the strong cultural ties and economic reliance on Bethel as a transportation hub.


19. White challenges the socio-economic integration of House District 31 at page 32, line 9. This district is integrated with tourism and both sport and commercial fishing being its major binding economic forces. Travel in the district is relatively easy with road and marine highway service. In addition the “milk run” out of Anchorage provides daily service to and from Yakutat and Cordova.
20. If in fact, the compactness challenge to House District 18 were valid, it is an easy fix. The area in question is a low population area that could be easily placed in the adjoining district. The reason the area was placed in with District 18 was Mr. White's concern over pairing Republican house members. The incumbent pairing could be remedied without creating compactness or deviation concerns so the move was made.
21. At page 33, line 7, there is an objection to district 10 on compactness grounds. This district is done this way in order to have one district entirely inside the City of Fairbanks and have to cross the city border only once.
22. Mr. White also objected to District 5 on the basis of lack of socio-economic integration and compactness. (Page 33 at line 13). It is my understanding that the Denali Borough was ruled as non-integrated with the MatSu Borough in both 2002 and in 1992. It was ruled as being integrated with the Fairbanks Northstar Borough and so was placed in a Fairbanks district in the current benchmark plan. Valdez argued strongly that it was integrated with Fairbanks Northstar Borough.
23. Finally, Mr. White claims the proportionality of Kenai Borough may be violated (page 34, line 9). To begin with the Kenai Borough has the majority in the three house districts to which it is entitled and so is in a position of control. The VRA is not what compelled splitting this borough; it is a one person one vote concern. The Kenai is bordered by four boroughs (MatSu, Lake & Pen, Anchorage, and Kodiak)

and three of those boroughs were in need of population sufficient to bring deviation within 10% of the plan as a whole. The Kenai was the sole area that was relatively integrated with each of the areas needing population and also could give population while still maintaining control over the 3 house districts to which they are entitled.

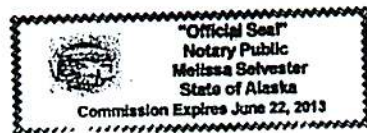
24. I make this affidavit in support of Coalition's contention that the Board did not follow a *Hickel* process in drafting the Amended Proclamation Plan now before the court

Further your affiant sayeth not.

Dated: April 16, 2012


Leonard Lawson

SUBSCRIBED AND SWORN to before me, a Notary Public in and for the State of Alaska, this 16th day of April, 2012




Notary Public
My Commission Expires 6/22/13

To the Alaska Redistricting Board
411 W 4th Avenue, Suite 302
Anchorage, AK 99501

Dear Alaska Redistricting Board

I would like to invite the Board to examine the latest RIGHTS plan map submitted today March 28, 2012 to the Redistricting Board. This plan is compliant with both state constitutional law and with Federal law as well.

Included in this packet of submitted materials is the conclusion of recognized Voting Rights Expert Professor Ted Arrington who has examined our map and concluded that this map meets the requirements of the Federal Voting Rights Act and would be deemed non retrogressive.

We have additional supporting materials we would like to present to the board further bolstering the evidence that all of the districts in this map are compact, socio-economically integrated, and contiguous. We would like to once again request that the Redistricting Board provide a time to make a presentation of this compliant map and have the opportunity to ask questions of our staff and members.

The evidence we plan to present would be evidence of socio-economic integration of each of our districts and respond to the issues the Board's Attorney had raised about our map in court. It is our sincerest belief that this map does not simply replace one constitutional issue for another but provides a balanced approach in which there are no deviations from the requirements of the state constitution.

Areas other than Ester are examined to be combined with a rural district in this map. The City of Homer, which unlike Ester, is not a bedroom community to a larger town. Homer has multiple connections to the rural regions of the state and has been a gateway for commerce with rural Alaska for decades. There are flights from Era aviation from Homer to Aniak 6 times a week. Many Bristol Bay Fishing permits are held by owners who dock their boats in Homer. Homer is the starting point for fuel barges leaving to Port Williams that continue on to service many of the Lake and Peninsula borough communities. Iliamna Development Corporation regular uses Homer as a base from which to move supplies to the rural areas of Alaska. Many Fisherman pay an annual \$1,000 fee to have their boats transported from Homer to William's Port and placed on the Pile Bay Road to be moved to waters of Bristol Bay. This operation is critical to the commerce in this region and Homer is a major link in this commerce chain.

It is still our belief that Ester is ill suited to be a connection with rural Alaska as it is a bedroom community to Fairbanks. There are limited if any stores in Esters and taken by itself, it lacks the basics of

independent commerce to be deemed self-sufficient. This raises questions of the socio-economic integration that would exist, if any, between Ester and more rural areas of the state.

We feel confident that our work can add positively to the work that the board is now undertaking to achieve a constitutional map. We would very much look forward to presenting our findings before the Board in the hopes of adding critical information into the discussion and process.

-Leonard Lawson
Executive Director
RIGHTs Coalition