

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

IN RE 2011 REDISTRICTING CASES)
)
)
)
)

4FA-11-2209 CI

REPLY TO ALASKA REDISTRICTING BOARD'S OPPOSITION TO
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT
RE SOCIO-ECONOMIC INTEGRATION

I INTRODUCTION

The Alaska Redistricting Board ("ARB" or "Board") correctly notes in its opposition that the appropriate inquiry here is whether the TCC/Doyon villages that were placed in Districts 37, 39, and 40 ("the Misplaced Villages") are socio-economically integrated with those districts. ADP has shown that the Misplaced Villages are not socio-economically integrated with those districts. It did so by presenting evidence that they are all part of a highly integrated TCC/Doyon socio-economic area. ADP also pointed out that there is no evidence in the Board record showing that any of the Misplaced Villages have significant socio-economic ties to areas outside the TCC/Doyon region. Furthermore, to the extent any outside socio-economic ties exist, they are not with the districts in which the villages were placed.

ADP is essentially in the position of having to prove a negative. ADP submitted no evidence on significant socio-economic integration between the Misplaced Villages and Districts 37, 39, and 40 because there is none. By law, the TCC/Doyon region is an area that encompasses Alaska Natives of common heritage and interests.¹ The converse, of course, is

¹ 43USC 1606 (a)

that Alaska Natives living in other ANCSA regions do not share the same common heritage and interests. Because the state and federal governments have decided to use the ANCSA corporations as a means of providing government services, they have effectively become quasi-governmental entities providing various public services and functions in the rural areas within their borders.

ADP presented evidence that all of the Misplaced Villages are integrated with the TCC/Doyon region with respect to economic development, health care, education and housing. There is absolutely no evidence in the record that any local government or ANCSA corporation based in Districts 37, 39, and 40 provide those services to the Misplaced Villages. In addition, TCC provides public safety services to the region through the Village Public Safety Officers program.² There is no evidence in the record of any local government or ANCSA corporation based in Districts 37, 39, or 40 providing similar services to the Misplaced Villages.

TCC is a major economic force within the TCC/Doyon region employing more than 700 full time employees and numerous part-time and seasonal positions. About two-thirds of its staff members work in village positions.³ In fact, as of this date, TCC is recruiting for five open positions in the Misplaced Villages.⁴ There is no evidence in the record showing that any other entities based in Districts 37, 39, and 40 are contributing to the economic development or job opportunities of the Misplaced Villages.

Finally, numerous residents of the Misplaced Villages have a common interest as shareholders of Doyon Limited. Doyon is the largest private landowner in Alaska with a land

² AS 18.65.670; ADP Exhibit No. 15

³ <http://www.tananachiefs.org/about/>

⁴ ADP Exhibit No. 16

entitlement of 12.5 million acres.⁵ A significant amount of that land is located near the Misplaced Villages.⁶ All residents of the TCC/Doyon region have a common interest in the responsible development of those lands.

ADP has produced sufficient evidence to demonstrate that the Misplaced Villages are all socio-economically integrated into the TCC/Doyon region. It has also pointed out the complete lack of evidence in record that there is any socio-economic integration between those villages and Districts 37, 39, and 40. ADP is entitled to summary judgment.

II DISTRICTS MUST REFLECT TODAY'S REALITIES

A common theme in the Board's opposition is that Districts 37, 39 and 40 are socio-economically integrated based on "future economic development."⁷ The Board argues that future mining projects in rural Alaska and Governor Parnell's Road to Resources program will lead to a vast network of roads in rural Alaska that will eventually make these districts socio-economically integrated.

If these projects ever actually do come to pass, it would certainly be appropriate for the 2020 or 2030 redistricting board to evaluate their impact on socio-economic integration. Arguing that they are evidence of socio-economic integration in 2013 is just daydreaming. The Board demonstrates that with its own Exhibit G which shows that a Fairbanks-Nome highway has been in the planning stages for at least half a century. The likelihood that these roads will ever be built is tenuous at best in an era of declining state revenues.

The checkered history of economic development projects in Alaska is well known. For every project that actually comes to fruition, the Alaska landscape is strewn with

⁵ <http://www.doyon.com/lands/overview.aspx>

⁶ See, e.g. ADP Exhibits 18 and 19.

⁷ *ARB Opposition* at 24-25.

the wreckage of dozens of big ideas that never panned out. Socio-economic integration patterns in Alaska would certainly be different today if the Rampart Dam had been built or if Willow had become the state capital or if Delta had become the barley supplier to the world. However, redistricting in Alaska cannot be based on future events that may or may not happen. Under the Alaska Constitution, districts must be based on actual socio-economic realities and not on the stuff that dreams are made of. Once you limit yourself to the realities of today, there is no evidence of socio-economic integration between the Misplaced Villages and Districts 37, 39, and 40.

III DISTRICTS 6, 37, 39, AND 40 ARE NOT SOCIO-ECONOMICALLY INTEGRATED

Misplaced Villages in District 37: The Board placed both the TCC Lower Yukon sub-region (Grayling, Anvik, Shageluk and Holy Cross) and the TCC Upper Kuskokwim sub-region (McGrath, Takotna, Medfra, Nicolai and Telida) into District 37 along with the Aleutians, Bristol Bay and the Lake and Peninsula Borough. The Board's justification for doing so is that the two TCC sub-regions are highly integrated with each other and are linguistically linked.⁸

While that is undoubtedly true, it leaves the real question unanswered. What socio-economic ties do those two TCC sub-regions have with the rest of District 37? The Board didn't even attempt to answer that question in its opposition. That is probably because the answer is that there are none.

The Board does point out that ADP was incorrect in its statements that TCC provides health care in these two sub-regions. ADP acknowledges that it was incorrect due to a

⁸ *ARB Opposition* at 28.

misreading by counsel of the information provided in ADP Exhibit 9. The Board correctly points out that the Lower Yukon sub-region receives health care services from the Yukon Kuskokwim Health Corporation and the Upper Kuskokwim sub-region is connected with the Southcentral Foundation based in Anchorage. This correction, however, adds nothing to the Board's claim that the two TCC sub-regions are socio-economically integrated with District 37. While it might show that the Lower Yukon sub-region has ties to Aniak and the Bethel region, it does nothing to establish socio-economic integration for either sub-region with District 37.

There is nothing in the record or in the Board's response demonstrating any socio-economic integration between these two TCC sub-regions and the Aleutians, Bristol Bay or the Lake and Peninsula Borough. There is no evidence in the record showing that the Native corporations or local governments in those areas provide services to the villages in the TCC sub-regions or have any interaction with them whatsoever. ADP is entitled to summary judgment with respect to District 37.

Misplaced Villages in District 39: The Board placed the TCC Yukon Koyukuk sub-region in District 39 with the Bering Straits region and the Wade Hampton area. The sub-region includes the villages of Huslia, Koyukuk, Nulato, Kaltag, Ruby and Galena. The Board claims that "[t]here are many strong relationships between this sub-region and the other communities in House District 39."⁹ Unfortunately, it doesn't identify any of them in its opposition and there is no evidence of them in the Board record.

The Board also claims that there are long-standing transportation relationships between the Yukon Koyukuk sub-region and the rest of District 39, but the best it can come up

⁹ *Id.* at 26

with is undeveloped subsistence trail between Unalakleet and Kaltag that may or may not become a road at some point in the future.¹⁰

The Board contends that ADP was wrong when it stated that the all the health care services in this sub-region were linked to TCC in Fairbanks.¹¹ ADP is actually right. While the Galena Health Center is the primary care facility for the sub-region, it is operated by TCC. ADP Exhibit 20 is a copy of Appendix E of the PL 93-638 funding agreement between the Indian Health Service and TCC listing the facilities that it operates. The Galena Health Center is included. Also attached as ADP Exhibit No. 21 is a page from the City of Galena's website indicating that the Director of the Galena Health Center is a TCC employee with a *tananachiefs.org* email address.

However, even assuming that the Board is correct that TCC does not manage health care services for the Yukon Koyukuk sub-region, that fact is not evidence that the sub-region has any ties to District 39. There is nothing in the record or in the Board's response demonstrating any socio-economic integration between this TCC sub-region and the Bering Straits-Wade Hampton area. There is no evidence in the record showing that the Native corporations or local governments based in District 39 provide services to the villages in the Yukon Koyukuk sub-region or have any interaction with them at all. ADP is entitled to summary judgment with respect to District 39.

Misplaced Villages in District 40: The Board placed the TCC villages of Hughes, Alatna, Allakaket, Bettles and Wiseman from TCC's Yukon Tanana sub-region into House District 40 with the North Slope Borough and the Northwest Arctic Borough. The

¹⁰ *ARB Opposition* at 26-27.

¹¹ *Id.* at

affidavit of Tom Begich admits that the only reason these villages were included in District 40 was to make up for the population loss when Arctic Village was taken out.¹²

ADP has shown that these villages are socio-economically integrated with the TCC/Doyon region. There is no evidence in the Board record of socio-economic integration between these villages and District 40. Aside from potential future development, the only factor that the Board can identify as supporting socio-economic integration is that the TCC/Doyon villages share a subsistence culture with the villages of the North Slope and Northwest Arctic. But evidence of lifestyle similarities is not enough. The Board must provide “sufficient evidence of socio-economic integration of the communities linked by redistricting, proof of actual interaction and interconnectedness rather than mere homogeneity.”¹³

The only actual subsistence interaction the Board could identify was a shared reliance on the Teshepuk caribou herd. Board Exhibit C is a map of that herd’s migration patterns. ADP Exhibit No. 17 is the Board’s Exhibit C with the District 40 Misplaced Villages superimposed on those migration routes. It shows that the connection between the Misplaced Villages and the Teshepuk herd is tenuous at best. The District 40 Misplaced Villages are on the periphery of or outside the herd’s migration routes.

There is nothing in the record or in the Board’s response demonstrating any socio-economic integration between the District 40 Misplaced Villages and the North Slope or Northwest Arctic boroughs. ADP is entitled to summary judgment with respect to District 39.

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¹² *Begich Affidavi* at ¶ 21

¹³ *Hickel v. Southeast Conference*, 846 P.2d at 46 (quoting *Kenai Peninsula Borough v. State*, 743 P.2d 1352, 1363 (Alaska 1987)).

III EQUAL PROTECTION

The Board freely admits that it made equal protection its primary focus when drawing its 2013 districts. It has apparently interpreted the Alaska Supreme Court's decision in the *In re 2001 Redistricting Cases*¹⁴ decision as requiring the Board to adhere to low deviations throughout the state. That is not the case. The Board has misinterpreted the Court's decision.

In *2001 Redistricting Cases*, the Court limited its application of the "as nearly as practicable" standard to urban areas. The reason for that is apparent. When drawing districts inside the boundaries of a municipality, there are no socio-economic factors to consider since a municipality is by law a relatively integrated socio-economic area. Under those circumstances, equal protection becomes the sole consideration aside from compactness. In rural areas where populations are lower and distances are greater, the Court was more flexible in applying equal protection.

It is important to note that in 2002 when the Supreme Court first enunciated its interpretation of the 1998 amendment with respect to deviations, the final overall deviation in the plan approved by the courts was 9.96%. Districts 6 and 36-40, the six most rural districts, had deviations of -4.9%, -4.76%, -3.34%, -4.80%, -4.32% and -3.31% respectively. The three Kenai Peninsula districts, Districts 33, 34, and 35 had deviations of +5.06%, +4.69%, and +4.87% respectively.¹⁵ Clearly the courts recognize that there must be some flexibility in applying equal protection. The Supreme Court did not apply a stricter standard to rural areas in 2002 and there is no reason for assuming it will do so now.

¹⁴ *In re 2001 Redistricting Cases*, 44 P.3d 141 (Alaska 2002)

¹⁵ ADP Exhibit No. 22.

IV COMPACTNESS

The Board also claims that including most or all of the TCC/Doyon villages in a single district would raise compactness concerns.¹⁶ However, the Board itself has submitted evidence that an interior district that takes in as many TCC/Doyon villages as possible is more compact than the Board's TCC/Doyon district, District 6. When compared to the McKinnon Plan District 36 includes most of the Misplaced Villages in a district that follows closely the TCC/Doyon Boundaries. When the two plans are compared, the McKinnon Plan District 36 outscores the Board's District 6 80.3 to 74.9 on the Schwatzberg test and 55.6 to 53.3 on the Roeck test. Compactness was not a legitimate concern.

DATED: October 1, 2013

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¹⁶ The Board apparently relied on the testimony of Calista's consultant Tom Begich who testified that such a configuration would have compactness issues. *ARB Opposition* at p. 9.



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VILLAGE PUBLIC SAFETY

The Village Public Safety Officer Program began in the late 1970's as a means of providing rural Alaskan communities with needed public safety services at the local level. The program was created to reduce the loss of life due to fires, drowning, lost person, and the lack of immediate emergency medical assistance in rural communities. The Village Public Safety Officer Program was designed to train and employ individuals residing in the village as first responders to public safety emergencies such as search and rescue, fire protection, emergency medical assistance, crime prevention and basic law enforcement. The presence of these officers has had a significant impact on improving the quality of life in the participating villages. As a result, the Village Public Safety Officers (VPSO) are generally the first to respond to many calls for help from community members; hence their motto:



“First Responders – Last Frontier”

Alaska State Troopers and Village Public Safety Officers are both essential but different resources to the Department of Public Safety and the State of Alaska. These two public safety assets are not interchangeable in their roles within the Criminal Justice System or within their general public safety responsibilities. The two are not comparable in their services nor in the commensurate costs that are involved in establishing their availability in the field.

Law enforcement in most rural areas is the primary responsibility of the Alaska State Troopers. From rural outposts the Troopers attempt to respond immediately to emergencies, felony, and misdemeanor cases. Their efforts, however, are often hampered by delayed notification, long response distance, the uncertainties of weather and transportation. In communities associated with the Village Public Safety Officer Program, citizens are afforded immediate response to all emergencies without delays caused by weather, distance, or budgetary restraints. Although VPSOs are not expected to handle high risk or complex investigative situations, they are the “First Responders” to all volatile situations in their communities. Working as a team with the Alaska State Troopers, they can stabilize most volatile situations and protect crime scenes until the Troopers can arrive. VPSOs frequently conduct and complete misdemeanor and minor felony investigations with assistance provided by the State Troopers.



Funding for the Village Public Safety Officer Program is provided by the legislature and managed by the Alaska State Troopers. The funds are awarded to participating regional Native nonprofit corporations through grant requests. The primary purpose of regional contracting is to place the local administration of the Program into the hands of an organization more aware of the specific needs of the areas to be served and to deal with a workable number of contracts while retaining a certain amount of regional flexibility. Each contractor, with the concurrence of the Division of State Troopers, selects which communities will participate.



Once the community has been selected, the local community, with the assistance of the State Troopers, is responsible for the selection and the daily activities of the Village Public Safety Public Officer. The contractor arranges for all salary payments based on the submission of time sheets from the communities. Group insurance plans, retirement plans, and maintenance of full financial accountability of contracted funds are also the responsibility of the contractor.

ADP Exhibit No. 15



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TCC JOBS BY LOCATION

Choose from 44 open positions in 42 locations or [search by category](#).

- [Alatna](#) (0)
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- [Birch Creek](#) (1)
- [Canyon Village](#) (0)
- [Chalkyitsik](#) (0)
- [Circle](#) (0)
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- [Fort Yukon](#) (1)
- [Galena](#) (0)
- [Grayling](#) (1)
- [Healy Lake](#) (0)
- [Holy Cross](#) (0)
- [Hughes](#) (1)
- [Huslia](#) (0)
- [Kaltaq](#) (0)
- [Koyukuk](#) (1)
- [Lake Minchumina](#) (0)
- [Louden](#) (0)
- [Manley Hot Springs](#) (0)
- [McGrath](#) (0)
- [Medfra](#) (0)
- [Minto](#) (1)
- [Nenana](#) (0)
- [Nikolai](#) (0)
- [Northway](#) (1)
- [Nulato](#) (0)
- [Rampart](#) (1)
- [Ruby](#) (0)
- [Shageluk](#) (0)
- [Stevens Village](#) (1)
- [Takatna](#) (0)
- [Tanacross](#) (3)
- [Tanana](#) (0)
- [Telida](#) (0)
- [Tetlin](#) (1)
- [Tok](#) (2)
- [Venetie](#) (0)

Contact Human Resources

(907) 452-8251 ext. 3155

hr@tananachiefs.org

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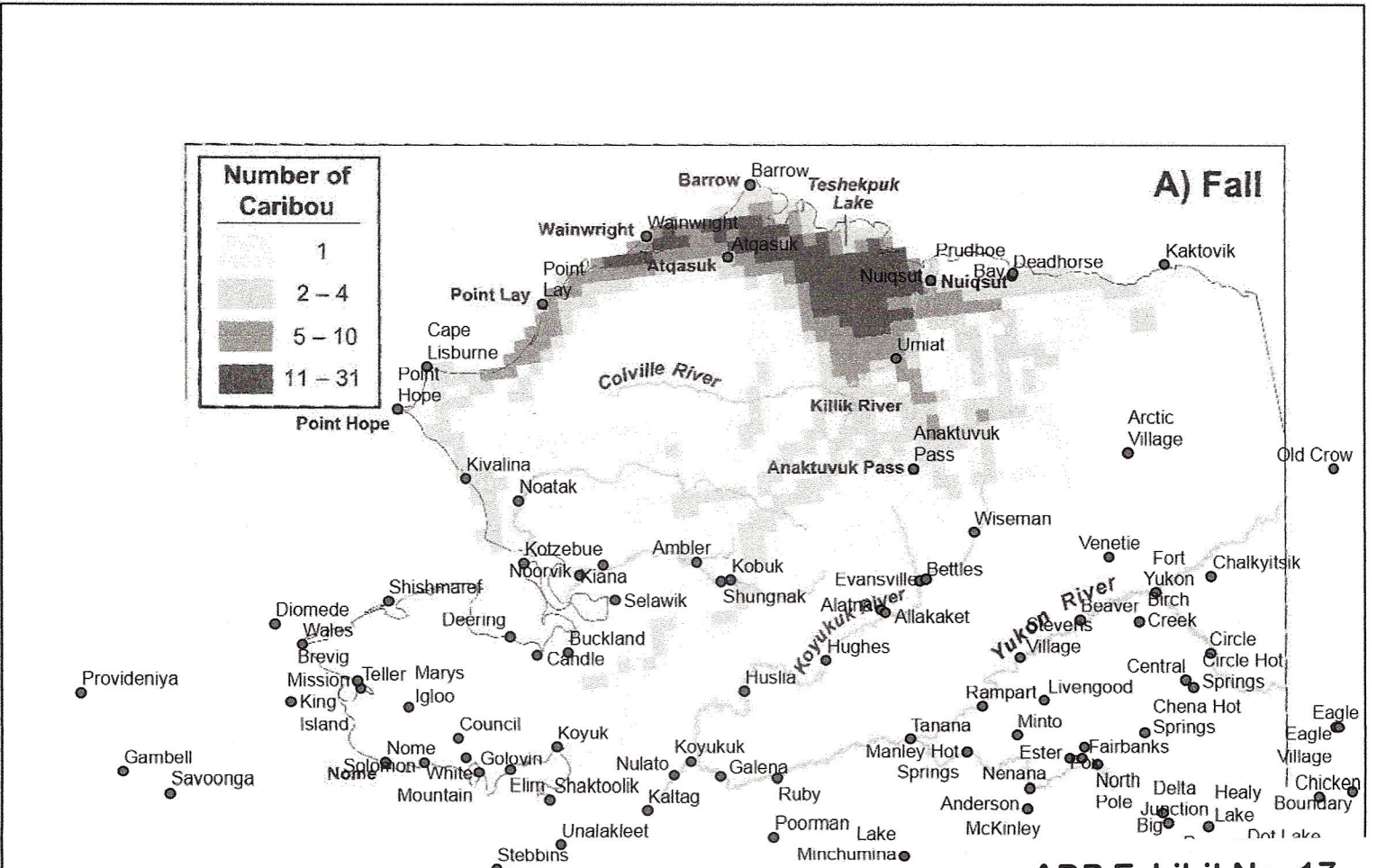
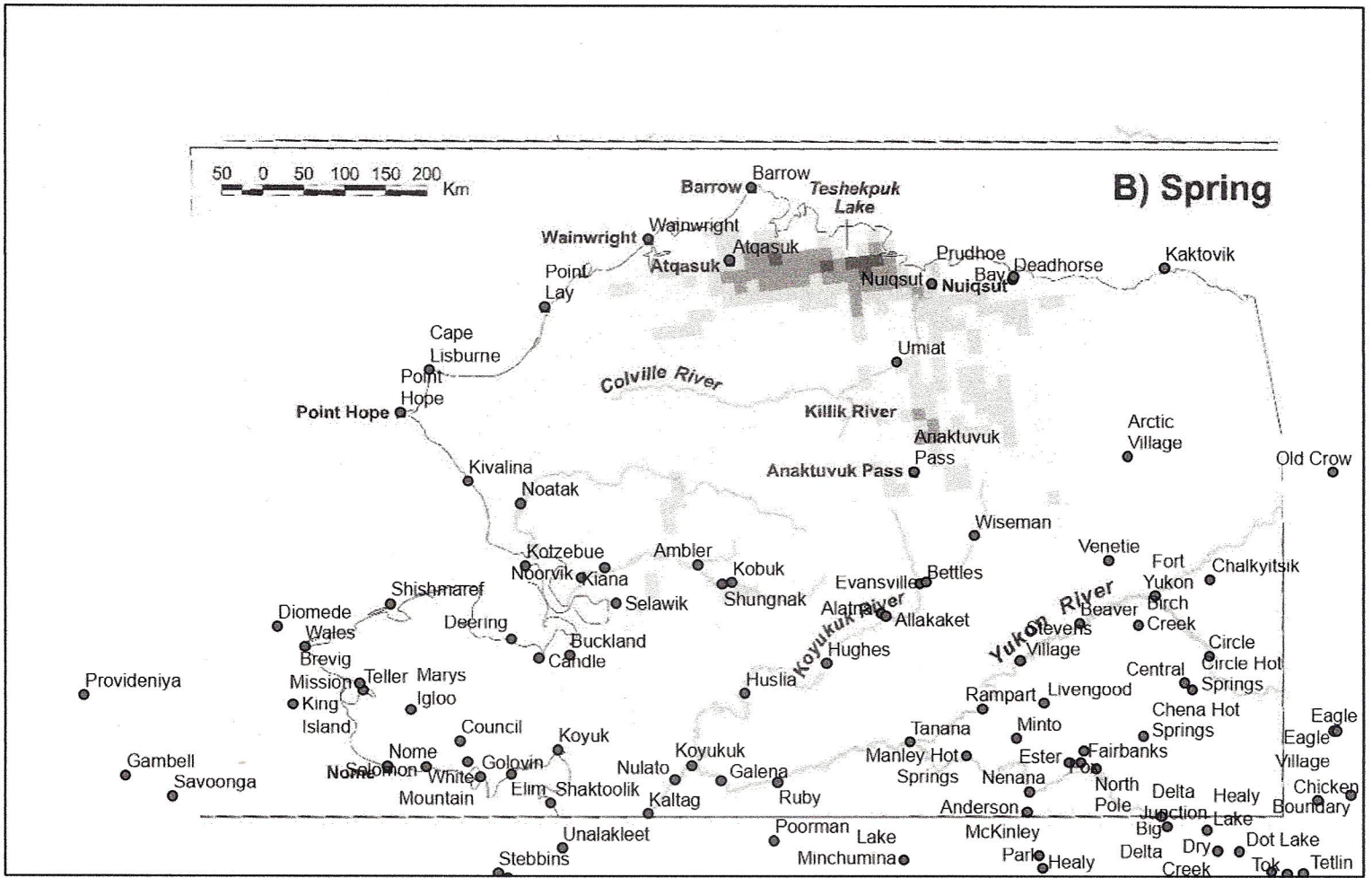
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Fairbanks Locations

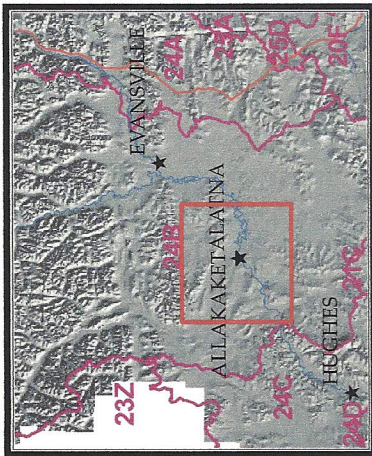
- [Administration Building](#)
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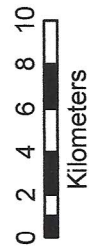
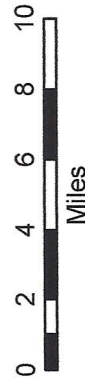


Index Map

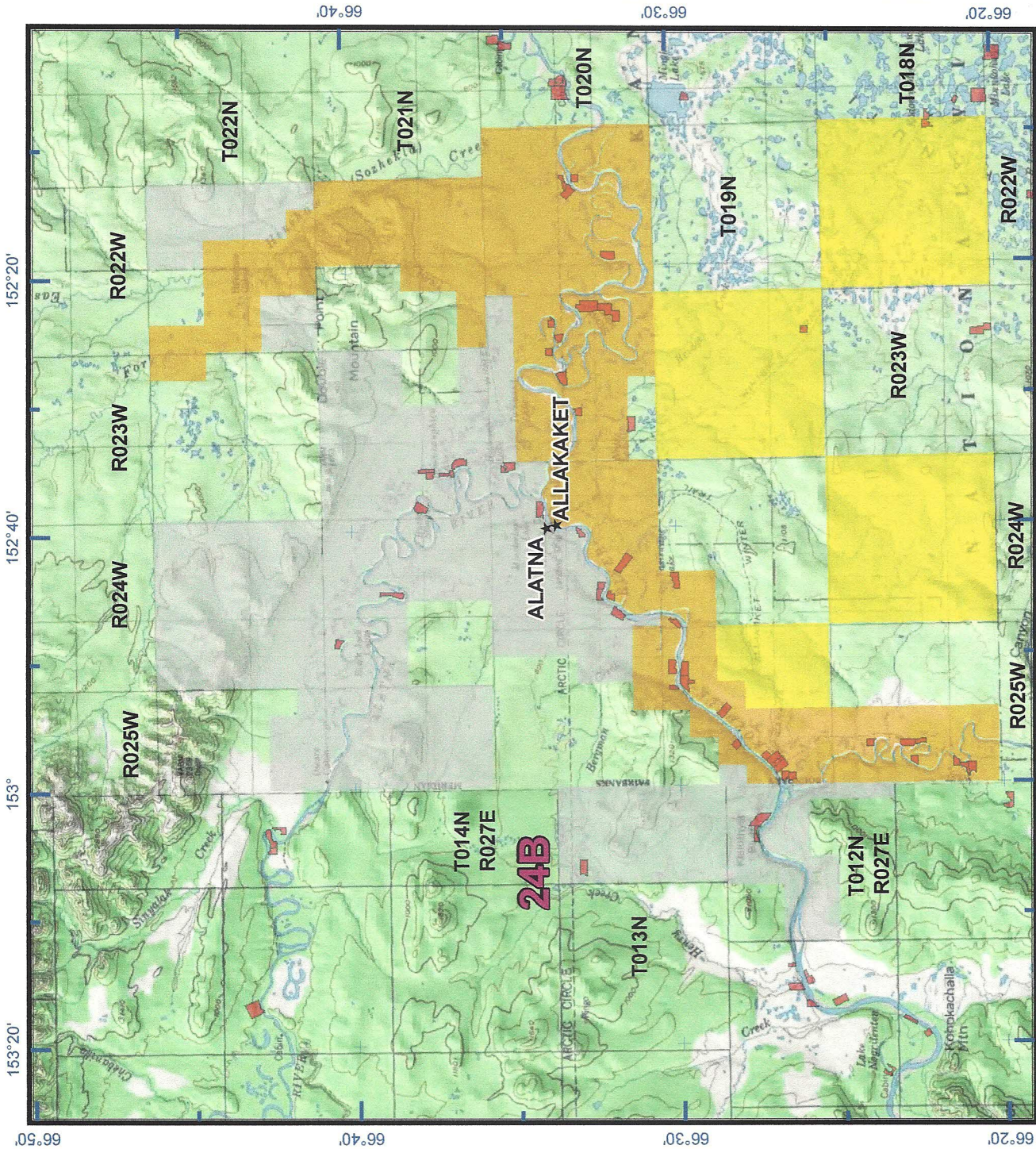


EXPLANATION

- ★ Towns
- Roads
- Game Management Unit
- Alaska Native Allotments
- Doyon Owned Lands
- Village Corp. Owned Lands
- Alatna Lands



Doyon
Limited



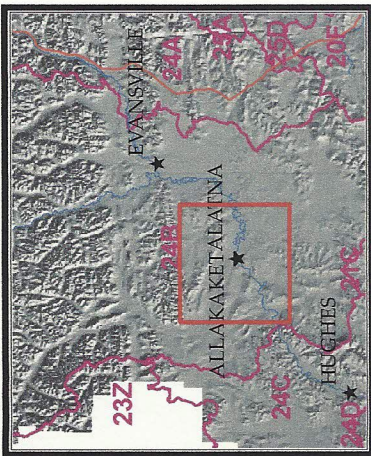
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ALLAKAKET, ALASKA

Kateel River and Fairbank
Bettles and Hughes Quadr

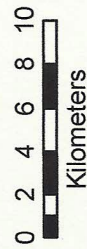
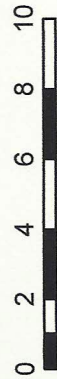
ADP Exhibit No. 18

Index Map

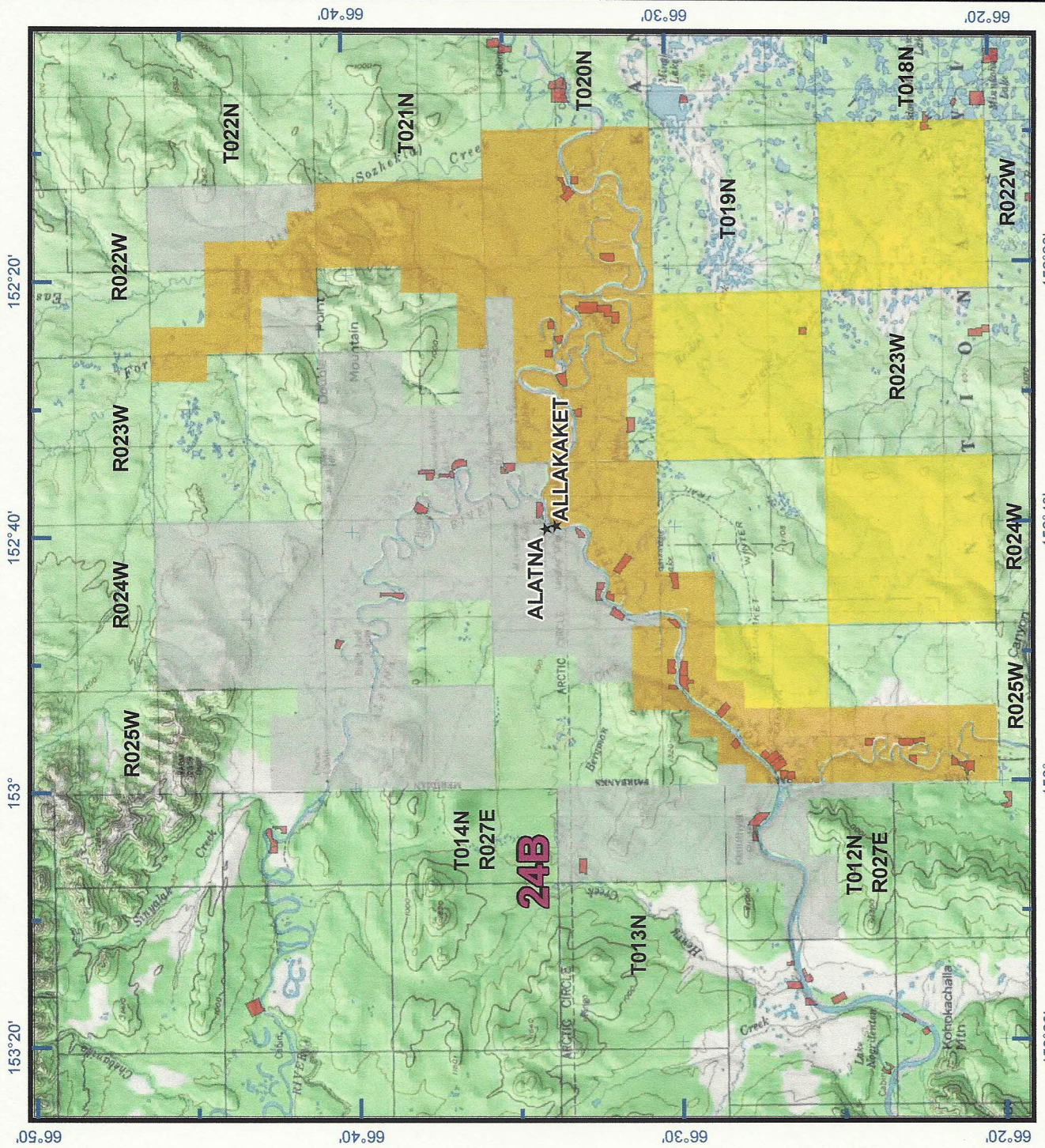


EXPLANATION

- ★ Towns
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- Doyon Owned Lands
- Village Corp. Owned Lands
- Alakna Lands



DOYON
Limited



ALLAKAKET, ALASKA

Kateel River and Fairbar
Bethles and Hughes Qua

ADP Exhibit No. 19

APPENDIX E
TANANA CHIEFS CONFERENCE
HEALTH SERVICES FACILITIES LIST
FY 2011-2013

This non-exhaustive list of Tribal Facilities and Locations identifies the sites where TCC owns, leases, occupies, or otherwise uses real property to carry out its responsibilities under the Alaska Tribal Health Compact and its Funding Agreement. Each description of facilities and locations is intended to include surrounding and adjacent grounds. Additionally, the references to specific PSFAs are not intended to limit the scope of PSFAS that may be performed at a facility or for which a facility may be used; rather, references are intended as an example of the type of PSFA that may be performed at the facility or of the manner in which a facility may be utilized.

	Facility Name	Location
	Chief Andrew Isaac Clinic/Fairbanks Memorial Hospital (see Sec 3.1.11)	Fairbanks, AK
	Graf Healing Place	Fairbanks, AK
	TCC Paul Williams House	Fairbanks, AK
	TCC Patient Hostel	Fairbanks, AK
	Al Ketzler Senior Building (see Sec 3.1.11, 3.2, 3.1.6, 3.1.5.7 of FA)	Fairbanks, AK
	Chief Peter John Tribal Building (see Sec 3.1.3.2.3, 3.1.5.3, 3.1.11)	Fairbanks, AK
	New Paul Williams House 117 First Ave (see Sec 3.5.3)	Fairbanks, AK
	Chief Andrew Isaac Health Center	Fairbanks, AK
	Old Minto Recovery Camp	Old Minto, AK
YT	Yukon Tanana MH & Alcohol Services	Fairbanks, AK
YT	Alatna Village Clinic	Alatna, AK
YT	Allakaket Village Clinic	Allakaket, AK
YT	Allakaket Counseling Center	Allakaket, AK
YT	Evansville Village Clinic	Evansville, AK
YT	Hughes Village Clinic	Hughes, AK
YT	Manley Hot Springs Village Clinic	Manley Hot Springs, AK
YT	Minto Counseling Center	Minto, AK
YT	Minto Village Clinic	Minto, AK
YT	Rampart Village Clinic	Rampart, AK
YT	Stevens Village Clinic	Stevens Village, AK
YT	Tanana Health Center	Tanana, AK
YT	Nenana Village Clinic	Nenana, AK
YF	Chalkyitsik Village Clinic	Chalkyitsik, AK
YK	Circle Clinic	Circle, AK

	Facility Name	Location
UT	Dot Lake Village Clinic	Dot Lake, AK
UT	Eagle Village Clinic	Eagle, AK
UT	Healy Lake Village Clinic	Healy Lake, AK
UT	Northway Village Clinic	Northway, AK
UT	Upper Tanana Alcohol Program	Eagle, AK Dot Lake, AK Healy Lake, AK Northway, AK Tanacross, AK Tetlin, AK Tok, AK
UT	Tanacross Village Clinic	Tanacross, AK
UT	Tetlin Village Clinic	Tetlin, AK
UT	Tok Community Clinic	Tok, AK
YK	Galena Health Center	Galena, AK
YK	Galena Behavioral Health	Galena, AK
YK	Galena Dental Clinic	Galena, AK
YK	Huslia Village Clinic	Huslia, AK
YK	Kaltag Village Clinic	Kaltag, AK
YK	Kaltag Behavioral Health	Kaltag, AK
YK	Koyukuk Clinic	Koyukuk, AK
YK	Nulato Village Clinic	Nulato, AK
YK	Ruby Village Clinic	Ruby, AK
YK	Ruby Behavioral Health	Ruby, AK
Xx	McGrath Health Center	McGrath, AK
xx	Nikolai Village Clinic	Nikolai, AK
xx	Takotna Village Clinic	Takotna, AK
***	Yukon Flats Health Center	Ft. Yukon, AK
***	Arctic Village Clinic	Arctic Village, AK
***	Beaver Clinic	Beaver, AK
***	Venetie Clinic	Venetie, AK
	Anaktuvuk Pass Clinic	Anaktuvuk Pass, AK
	Anaktuvuk Pass Behavioral Health	Anaktuvuk Pass, AK

*** The Counsel of Athabascan Tribal Governments also provide IHS funded services in these facilities under its Funding Agreement with IHS.

xx TCC provides BioMed, OEH, and Home Health Care services only. Other IHS funded health services are provided at these facilities by Southcentral Foundation under its Funding Agreement with IHS.

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Galena City

HEALTH FACILITIES

EDGAR NOLLNER HEALTH CENTER

DANYA OLSON

Clinic Director

DANYA.OLSON@TANANACHIEFS.ORG(907) 656-1366**Fax:** (907) 656-1525

Behavioral Health Services

Telephone: (907) 656-1617(907) 656-1581**Mailing address**PO Box 77, Galena, AK 99741EMERGENCY
NUMBERSMEDICAL
656-1266FIRE
911POLICE
656-0911TROOPERS
656-1233

The City of Galena provides health care services for the community at the Edgar Nollner Health Center (ENHC). This modern facility offers basic health care, as well as telemedicine, teleradiology, digital x-ray, emergency and consulting rooms, ambulance, and conferencing and administrative facilities.

Nurse Practitioners and Physician's Assistants deliver basic health care and preventative medicine, including pregnancy screening, well-baby checks, and outreach services. Their care is enhanced by regularly scheduled itinerant services, such as mammography and vision clinics.

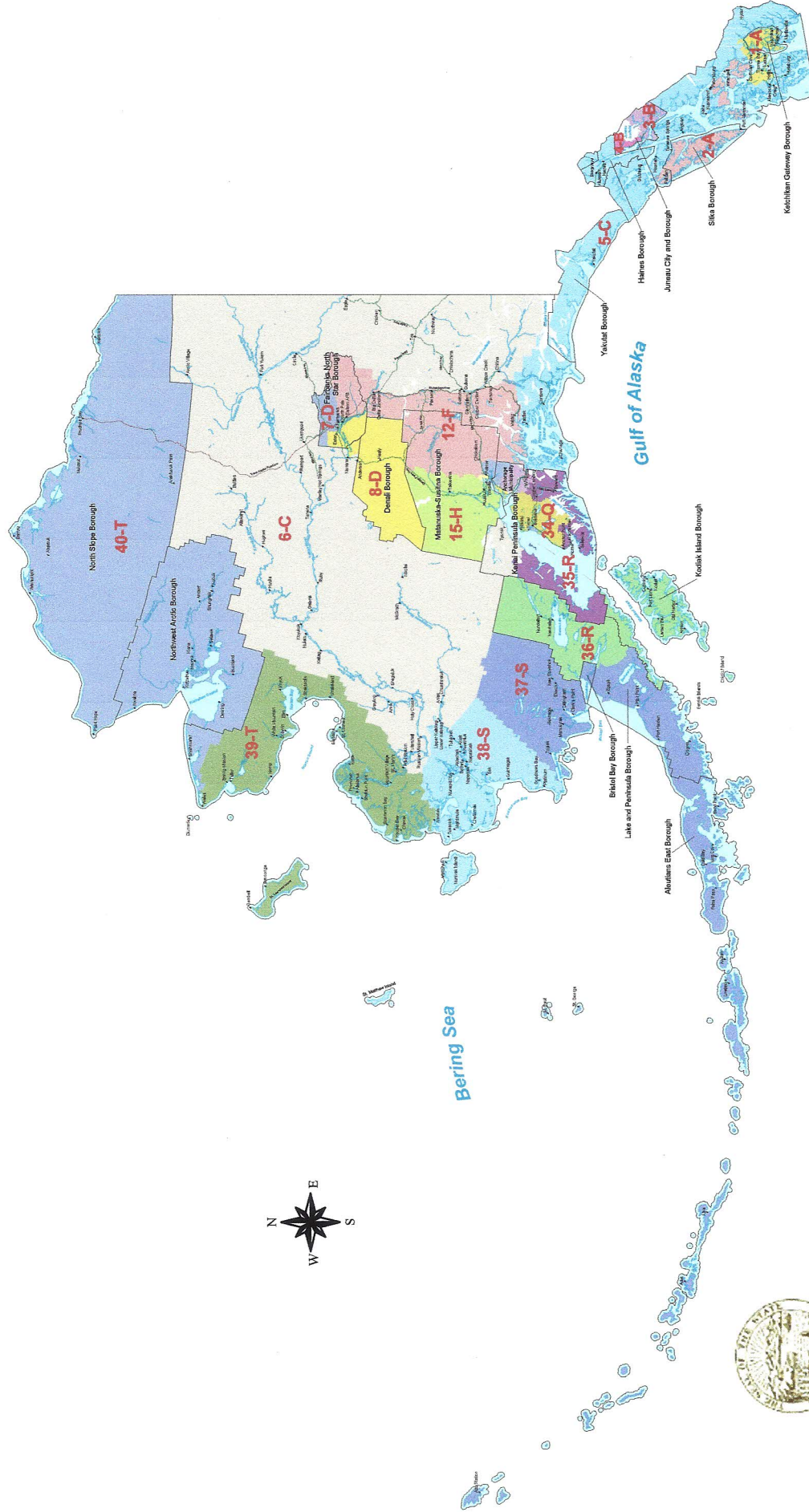
The U.S. Public Health Service maintains an office at the ENHC and visits regularly, providing immunizations, TB testing, and consultations.

Outreach health care services, performed by ENHC providers, are scheduled monthly for the villages of Ruby, Koyukuk, Nulato, Kaltag, and Huslia. The ENHC also coordinates with the Tanana Chiefs Conference to provide health aides for the surrounding villages.

EMT Services:

The City of Galena provides for EMT services in Galena. This includes ambulance service and EMT and ETT training.

Amended Final Redistricting Plan



Amendments adopted by Alaska Redistricting Board
April 13 as modified on April 18, 2002

Prepared by Alaska Redistricting Board
April 25, 2002

Amended Final Plan Population Analysis

House District	Senate District	Total Population	Per Cent Deviation from ideal (15673)	Per Cent Alaska Native*	18+ Population
1		15,031	-4.10%	17.62%	10,817
2		14,991	-4.35%	20.14%	10,809
	A	30,022		18.88%	21,626
3		15,203	-3.00%	17.99%	11,459
4		15,508	-1.05%	12.10%	10,835
	B	30,711		15.05%	22,294
5		15,048	-3.99%	37.90%	10,669
6		14,905	-4.90%	54.53%	9,774
	C	29,953		46.21%	20,443
7		15,494	-1.14%	7.57%	10,899
8		15,552	-0.77%	9.89%	11,572
	D	31,046		8.73%	22,471
9		15,723	0.32%	16.33%	11,261
10		15,599	-0.47%	8.70%	10,847
	E	31,322		12.51%	22,108
11		15,904	1.47%	7.19%	10,826
12		16,303	4.02%	6.62%	10,861
	F	32,207		6.90%	21,687
13		16,231	3.56%	7.93%	10,835
14		16,119	2.84%	7.54%	10,567
	G	32,350		7.74%	21,402
15		16,137	2.96%	8.98%	11,235
16		16,104	2.75%	7.18%	11,082
	H	32,241		8.08%	22,317
17		15,819	0.93%	4.89%	10,642
18		15,639	-0.22%	3.52%	10,266
	I	31,458		4.21%	20,908
19		15,841	1.07%	13.36%	11,020
20		15,837	1.04%	16.51%	10,397
	J	31,678		14.94%	21,417
21		15,850	1.13%	8.59%	11,086
22		15,831	1.01%	15.49%	11,413
	K	31,681		12.04%	22,499
23		15,847	1.11%	16.48%	12,703
24		15,812	0.88%	10.30%	11,696
	L	31,659		13.39%	24,399
25		15,836	1.04%	12.79%	12,129
26		15,823	0.96%	8.60%	11,877
	M	31,659		10.70%	24,006
27		15,820	0.94%	7.92%	11,053
28		15,839	1.06%	6.44%	10,893
	N	31,659		7.18%	21,946
29		15,846	1.10%	11.18%	11,271
30		15,839	1.06%	7.92%	10,673
	O	31,685		9.55%	21,944
31		15,811	0.88%	5.27%	10,886
32		15,329	-2.20%	4.87%	11,161
	P	31,140		5.07%	22,047
33		16,466	5.06%	9.14%	11,220
34		16,409	4.69%	7.93%	11,524
	Q	32,875		8.54%	22,744
35		16,436	4.87%	11.44%	11,815
36		14,928	-4.76%	21.26%	10,019
	R	31,364		16.35%	21,834
37		15,150	-3.34%	47.28%	11,192
38		14,921	-4.80%	85.36%	8,970
	S	30,071		66.32%	20,162
39		14,996	-4.32%	84.82%	8,845
40		15,155	-3.31%	79.39%	9,116
	T	30,151		82.11%	17,961

* Alaska Native race defined as people who identified themselves in the census as a single race, Alaska Native, or White and Alaska Native, according to guidelines of U.S. Department of Justice.