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August 25, 2023

**VIA FACSIMILE**  
**(907) 586-4552**

Beth McEwen, MMC  
CBJ Municipal Clerk/Election Official  
City and Borough of Juneau  
155 S. Seward Street  
Juneau, Alaska 99801

Dear Ms. McEwen:

Please consider this formal notice that Huna Totem Corporation hereby submits this letter as Motion to Intervene as the real party of interest regarding Notice of Appeal #2023-AA01 filed by Karla Hart. The appeal was received by your office on August 4, 2023. The Assembly accepted this appeal at the Regular Assembly meeting on Monday, August 21, 2023.

The issues on appeal pertain to decisions made by the Planning Commission on July 11, 2023, concerning Huna Totem's Floating Dock Project under Conditional Use Permit USE2023-0003, ("CPU USE2023-0003") The Planning Commission's decision to approve permitting was supported by substantial evidence as outlined in its Notice of Decision dated July 20, 2023. The Planning Committee approved issuing the Conditional Use Permit for a 50,000 square foot space of retail and related uses, underground bus staging and vehicle parking, and a park, in addition to a floating steel dock up to 70 feet wide and 500 feet long. On August 8, 2023, the Planning Commission approved additional aspects of the CPU USE2023-0003 proposal.

Now that the underlying appeal has been accepted, this Motion to Intervene is ripe; Huna Totem is the real party of interest behind the development of CPU USE2023-0003. As the City Attorney defends the Planning Commission's approval of CPU USE2023-0003, we intend to supplement the record and advocate on behalf of Huna Totem Corporation.

We appreciate the efforts of your office to administer this process expeditiously. All future communications regarding this matter may be directed to my attention.

Beth McEwen, MMC  
CBJ Municipal Clerk/Election Official  
City and Borough of Juneau  
August 25, 2023  
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We look forward to working through and resolving this appeal.

Very truly yours,

SCHLEMLEIN FICK & FRANKLIN, PLLC

Garth A. Schlemlein

cc: Russell A. Dick, President & CEO, HTC  
Dan Bruce, Attorney at Law, Baxter Bruce & Sullivan P.C.  
Fred Parady, Executive Vice President  
Sherri Layne, Assistant Municipal Attorney, CBJ Law Department