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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

In the Matter of the
2021 Redistricting Plan

Case No. 3AN-21-08869 CI
(Consolidated)

Non-Anchorage Case No: 3PA-21-02397 CI

**MATANUSKA-SUSITNA BOROUGH AND MICHAEL BROWN'S
EXPERT TESTIMONY AFFDIAVIT OF STEVE COLLIGAN**

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

STEVE COLLIGAN, being first duly sworn upon oath, depose and state as follows:

1. I am over the age of 18 and have personal knowledge of the information set forth herein.
2. 3GLP, Inc. doing business as E-Terra was retained by the Matanuska-Susitna Borough ("MSB") and Michael Brown to serve as an expert in the above-captioned matter. I am the sole shareholder of 3GLP, Inc.
3. I am being compensated for my work as an expert in this matter at the rate of \$225 per hour.
4. In order to develop the following opinions I relied on my education, experience and

involvement with the Redistricting process. In addition, I reviewed the following:

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- a. ARB Final Plan
- b. MSB Complaint
- c. All ARB Adopted Plans
- d. ARB Member and Staff Affidavits

Additional information relied upon is included in paragraph 30 herein.

5. I am a resident of the State of Alaska. I was born and raised in Fairbanks. After college, I relocated to Anchorage. In 1999, I relocated to Wasilla within the Matanuska-Susitna Borough where I currently reside.

6. I attended the University of Alaska Fairbanks. In 1982, I received my Associates of Science in Petroleum Engineering. I continued my education in Civil Engineering and Information Technology with emphasis in petroleum/civil engineering - Land Surveying, Digital Design and Land Based development using Coordinate Geometry (COGO).

7. I have held industry specific certifications for IT, Database and Distributed Systems Administration, Personnel Management, Certified Trainer in GIS, Computer Aided Design and Electronics and Software Development. My career has been focused on doing, mentoring other people and achieving results; not academic theory.

8. I have over 30 years of experience related to geographic information systems (“GIS”), data analysis and geomatics.

9. In 1984, the Municipality of Anchorage was the first GIS site and Environmental Systems Research Institute (“ESRI”) in the world. At that time, I served as the GIS Analyst. In my position, I provided statistical data compilation for the Municipality of Anchorage annual census and population estimates.

10. From 1989 through 1991, I was employed as the MSB GIS Division Manager from 1990-1993. In my position, I managed creation of MSB first Digital Base Map Systems.

11. In 1993, I co-founded GeoNorth which became 3GLP, Inc. in 1998.

12. E-Terra was formed in 1999, as a 3GLP subsidiary. My company compiled geospatial and address data to create initial MatCom E-911 addressing database for automated dispatch and consolidation. My company also assisted the City of Valdez and other small communities Statewide to develop and compile parcel data and Cadastral control for digital base map creation.

13. In October 2011, I was elected to serve as an assemblyman on the MSB Assembly. I served two terms representing the people of Region 4, of the greater Wasilla area.

14. In December 2011, I founded Precision Flight Devices, another 3GLP subsidiary. Precision Flight Devices is a small unmanned aircraft systems consulting and integration company.

15. I am the sole-proprietor of Alaskans for Fair and Equitable Redistricting AFFER.org (“AFFER”).

16. AFFER was formed in 2010 and again 2021 to provide technical support and consulting services to Alaskan organizations needing to participate in the Statewide redistricting process. It is the goal of AFFER to draw meaningful boundaries that follow easily identifiable lines and geographic features, that also protect communities, regional interests and legal rights of individuals. From its inception, AFFER has worked with a combination of rural native corporations and individuals from both side of the political aisle.

17. In March 2019, I was appointed by the Governor to the 2020 Counts Board to help prepare other communities and increase Census participation especially in rural Alaska. The other responsibilities of the Counts Board were to allocate limited funds to education and outreach campaigns across the state.

18. Throughout my career, I have worked in the geospatial realm including participating in Pre-Census Data organization, Census Redistricting Process/Plan development, and Post Census Local Boundary. In this field, I have worked as professional staff compiling Census and local population data, as a business owner and project lead consultant with professional support staff, and as an individual boundary and data expert.

19. I have worked with US Census data since 1984 to support economic development and business research, from supporting private business, Alaska Native Corporations, State and Local Governments, and non-profit entities, through geospatial data processing and business location/infrastructure development, transportation planning, emergency services planning and data development. A true and correct copy of my curriculum vitae is attached hereto as Exhibit A.

20. E-Terra was hired in 2018 as a Consultant to the MSB in order to process and participate in Census Data development after decades of continual growth in the MSB. E-Terra was retained as part of a process the MSB was engaged in to directly coordinate with its cities and Census Bureau.

21. E-Terra assisted in the MSB's pre-Census submission to the Census Bureau.

22. The goal of this initial work and pre-Census submission was to create base map data that statistical data would be tied to and eliminate legacy census blocks where possible to provide the highest level of drawing future boundaries that aligned with geographic features and transportation infrastructure as possible. I analyzed Census Blocks to mitigate where possible Census Blocks that had increased parcel subdivision development and resulting increased population.

23. Custom data layers were compiled using Census blocks, local administrative boundaries, updated aerial imagery and E-911 master street data. The end results were filed as a MATANUSKA-SUSITNA BOROUGH AND MICHAEL BROWN'S EXPERT TESTIMONY AFFDIAVIT OF STEVE COLLIGAN

formal request to the US Census Bureau. The prepared request and supporting statistical data was submitted through the Borough Planning and GIS staff to the US Census during the open data period, and the proposals set forth by the MSB were eventually all accepted by the US Census bureau.

24. E-Terra worked directly with the MSB to consult regarding the Statewide Redistricting process and to create the submission of map that supports the MSB pre-Census work and to perform post-Census consulting.

25. The map was developed using software to assess custom datasets from US Census Blocks and Attributes to demonstrate more fully what is happening under the main boundary software. This software not only allows you to overlay maps but allows you to overlay data and perform custom analysis. To create constitutional boundaries for districts that are compact, contiguous, relatively socio-economically integrated, and have a fair and equitable population deviation, it can be like a game of chess and requires one to rotate population around through several districts to achieve clear and meaningful results that follow geographic features.

26. For the past two Census cycles the Alaska Redistricting Board has used the application AutoBound, by CityGate GIS. CityGate GIS is a third-party analysis platform written on top of a industry standard geographic information platform from ESRI called ARCGIS.

27. E-Terra uses full enterprise licenses of ARCGIS as well as other open-source GIS tools for processing and analyzing geospatial data. As I referenced above, during my consultation the full enterprise version of ARCGIS was used to create additional independent overlays to be used during operation of AutoBound. The enterprise ESRI ARCGIS tools were available to the Board through its State of Alaska licensing agreement but were not fully implemented by ARB.

28. Autobound/CityGate GIS, provided all of its customers nationwide with baseline US Census Bureau datasets. These were indexed and preprocessed for use in their application as part of the software license fee within 48 hours of the Census data release. E-Terra, the Alaska Redistricting Board, and other entities across the nation all utilize the same geospatial dataset. The pre-processed data allows for the immediate use of the Autobound “EDGE tool”. The dataset also contains all of the original and raw census data from the US Census Bureau distribution.

29. Using Autobound EDGE, by itself with its standard configuration, allows the user to create and develop boundaries quickly but shelters the user from the underlying data. Achieving boundaries that follow natural geographic features and meaningful associations is difficult without seeing that underlying building block data below the surface of the tool. This data set along with other photos, spherical video (street view) are critical when trying to create district deviations in urban areas below 1%, while also following meaningful natural boundaries.

30. In addition to the Autobound EDGE application and data, I created and used several other datasets that are key in the efficient analysis of District Boundaries. Below are a list of data and sources:

- a. Census block Density Shading and labeling of Total Population field in each block
- b. Aerial Photography:
- c. Google Maps 2D and 3D, Satellite and Aerial photogrammetry, Road Network
- d. State Alaska and Local Government, Updated Aerial Photography and Terrain data – Mat-Su GIS, State of Alaska Geographic Information Network.
- e. Google Street View – Vehicle based Spherical views of street navigation
- f. Administrative boundaries: as published from Alaska GIS Portal and other local government portals for the latest administrative, Assembly, School District, city corporate boundaries, service areas and transportation plans.
- g. Local Government land parcel and subdivision overlays.
- h. Alaska Native Corporation Boundaries (SOA GIS Portal, SOA GIS Portal),

- i. Alaska Native Language Overlays – University of Alaska Fairbanks
- j. Alaska Place name database USGS, State of Alaska and individual Native Corporation data.

31. In the most recent Census, the MSB demonstrated the fastest growing population in the State of Alaska, with a population of 107,081, an increase of 18,086 residents, representing 78 percent of the Statewide population growth.

32. Based on the population of 107,081, and the quotient of 18,335, the MSB is entitled to 5.84 House Districts.

33. E-Terra used the Autobound software, as referenced, the same software utilized by the ARB, to develop maps in coordination with the MSB. Those maps were submitted by the MSB to the ARB. A true and correct copy of those maps are attached hereto as Exhibit B, p. 2-4.

34. The final map for the MSB adopted in ARB’s Proclamation Plan (“Final Plan”) on November 10, 2021, contains districts that are not compact or contiguous, and have unconstitutional population deviations compared to other regions which were entirely avoidable as observed in earlier versions of the maps. A true and correct copy of the ARB’s Proclamation Plan is attached hereto as Exhibit C.

35. For example, Anchorage has the largest concentration of districts but was drawn with overall negative deviations, rather than neutral or positive deviations, in comparison to the MSB which had the fastest growing population in the State but was drawn with positive deviations in every district. Attached as Exhibit D is a true and correct copy of the Population Tabulation from the ARB Proclamation Plan. The Anchorage districts are identified as ARB Districts 9 through 24. The MSB districts are identified as ARB Districts 25 through 30.

36. The Final Plan overpopulated the MSB by almost 14% across all six districts, or 2.5% in each of the six House Districts. The problem is only further compounded, as each of the related Senate seats is then overpopulated, particularly in urban Wasilla where it is over 5%. This means that the Final Plan left the MSB with an excess population of just over 2,500 people. See Exhibit D. A true and correct copy of the graphic below is attached hereto as Exhibit E.

**ARB Final Plan Deviation
 Mat_Su Districts**

House Dist	Senate #		Total % over Pop	% Over by Senate	Total Over Population of MSB District	
					TotPop	Percent
25	M	Palmer LZ mtn, Butte	2.39%	4.89%	2,520	13.76%
26	M	Palmer KGB	2.50%			
27	N	Wasilla Meadow Lks	2.58%	5.24%		
28	N	Core Area Leftovers	2.66%			
29	O	MSB Rural E	2.53%	3.63%		
30	O	MSB Rural W	1.10%			

37. The MSB submission of proposed districts took into consideration the socio-economics of the region to create compact and contiguous districts that also reflect the huge population growth observed in the Census data. See Exhibit B.

38. The proposal more fully aligned with the principles of “one person, one vote” with deviations of -0.08 across all six districts. Attached as Exhibit F is a true and correct copy of the deviation tabulation from the AFFER Plan submitted on September 20, 2021, which included the MSB proposed districts. MSB districts are identified as MSB Districts 11 through 16, and have been highlighted for reference.

39. The ARB Final Plan does not show a similar consideration for this area. To demonstrate the differences, MSB created a comparison map showing the differences in the district boundaries introduced by MSB (map on the right with orange boundaries) and the final district

boundaries adopted by ARB (map on the left with blue boundaries). Attached as Exhibit G is a true and correct copy of the MSB comparison map.

40. The first obvious issue that jumps out when doing a cursory review of the maps in Exhibit G, is that the outer areas of the City of Palmer have been cut into 4 districts in the ARB final plan. Specifically, into ARB Districts 25, 26, 28, and 29. Comparatively, MSB's plan for that region, numbered District 15, draws that boundary to follow from the S. Glenn Highway up to the West side of Trunk Road and around the affiliated northern communities. See Exhibit G, p. 1.

41. This distinction is important because it is generally understood that the Palmer community boundary follows the Trunk Road/S. Glenn Highway boundary as it runs South to North, stopping sometime after the Bogard Road area to the North. Generally, the area East of Trunk Road and East of the S. Glenn Highway is serviced by the City of Palmer, and therefore included in MSB's proposed map of District 15. The area to the West is serviced by the City of Wasilla.

42. For example, ARB's inclusion of the areas around the S. Glenn Highway with ARB District 26 has placed Palmer's hospital, the Mat-Su Regional Medical Center, into a Wasilla district. This hospital has a Palmer zip code and receives its utility services by the City of Palmer. Attached as Exhibit H is a true and correct copy of a Google Maps screen shot of the hospital's location. See also Exhibit C, p. 43.

45. ARB District 25 includes Butte, and the areas of Lazy Mountain and Knik, into the same district that holds the main population center of the City of Palmer. See Exhibit C, p. 42.

46. Residents from these areas submitted testimony to the ARB that they have more in common with Sutton and those communities headed out the Glenn Highway, than with the urban center of Palmer. MSB proposed District 15 respects those concerns. A true and correct copy of of MSB's proposed District 15 is attached hereto as Exhibit J.

47. ARB District 29 runs from the northern outer City of Wasilla area, North until the Cantwell area, and then its southern border encompasses the area South of the Glenn and Richardson Highways to include Valdez. See Exhibit C, p. 46.

48. While ARB District 29 appears to be contiguous with Valdez, it is not. ARB drew the land area for District 29 South, or below, the portion of the Glenn Highway that runs approximately from Nelchina to Glennallen and South/Southwest or below the portion of the Richardson highway that runs from Glennallen to a road in the area after Tosina described as 8-APL-2 Road. In doing so, it carved out a portion of both the Glenn and Richardson Highways from ARB District 29 and completely included these areas in ARB District 36. A true and correct copy of a map of this region is attached hereto as Exhibit K.

49. As a result of the errant action of the ARB, ARB District 29 is neither compact nor contiguous. MSB residents of ARB District 29 are not joined with Valdez by the road system.

50. ARB members have testified that ARB District 29 is drawn substantially similar to District 9 from the 2013 Redistricting Proclamation, with respect to its treatment of Valdez. That is incorrect. District 9 was drawn to include all of the communities along the Glenn Highway to Glennallen, and some communities along the Richardson Highway while incorporating Valdez.

Meaning that District 9 did not carve out the road system to leave Valdez orphaned at the
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southernmost end of the district like ARB District 29 has done. A true and correct copy of District 9 from the 2013 Redistricting Proclamation is attached hereto as Exhibit L.

51. Further evidence that District 29 is neither compact nor contiguous is demonstrated by the large swath of land between Valdez and Sutton. This area is an unpassable area of mountains, ice fields, and glaciers. Despite a geocoding anomaly in this area that incorrectly shows four people live in this unpassable area, there is no actual population there to connect Valdez to those Glenn Highway communities on the opposite side of the expanse. It is more likely that this anomaly is picking up population from the South Glenn Highway area or North of the Richardson Highway. True and correct maps showing this anomaly is attached hereto as Exhibit M.

52. Page 2 of Exhibit M is a map of ARB District 29, shaded to show the population density of the district. The shading is darker in the areas with higher population. The numbers are the amount of population in a given Census block. From this birds eye view of the district, only the largest Census blocks are visible, however more would be visible if one were to zoom in on an area. This map further details the lack of population connecting Valdez to the MSB communities in ARB District 29.

53. Most problematic is that ARB District 29 would create a huge geographical disconnect between the residents and the offices of their elected official. For instance, if residents of ARB District 29 elect a representative from Valdez, MSB residents who live outside the Wasilla/Palmer area in ARB District 29 would have to cross ARB District 36 in order to reach their representative in Valdez if traveling by car. Alternatively, MSB residents could drive to Anchorage and take a commercial flight to Valdez because the Wasilla/Palmer area does not have a commercial air service to Valdez. The opposite is true if residents of Valdez elect a

representative from the greater Wasilla/Palmer area. Attached as Exhibit N are true and correct copies of driving maps between the Wasilla/Palmer and Valdez areas.

54. It is an obvious indication of a district not being either compact or contiguous, to require its voters leave their district and traverse through a different district in order to reach their representatives. This is a prime example of the lack of understanding of what it means to create a district that is both compact and contiguous.

55. ARB District 28 is significantly different from what was proposed by the MSB, and specifically cuts across proposed MSB Districts of 13 and 14. MSB drafted these districts recognizing the core areas and economic zones, and respecting historical connections within the community. See Exhibit G, p. 1.

56. For example, proposed MSB District 13 includes the City of Wasilla and the immediate area to the North called Tanaina. Tanaina is considered an extension of the City of Wasilla and has been treated as such for redistricting purposes for the last two decades. It stretches from the top boundary of the City of Wasilla limits to Shrock Road, which is the northernmost boundary of MSB District 13. A true and correct copy of MSB District 13 is attached hereto as Exhibit O.

57. ARB District 28 cuts this region away from the City of Wasilla and pairs it with the area North of the Parks Highway all the way into the westernmost region of Palmer. This creates an unnecessarily irregularly shaped, sideways district which does not reflect the best option for the region in terms of contiguity and compactness. See Exhibit G, p. 1, and Exhibit C, p. 45.

58. ARB also included the area of Meadow Lakes in the same district as the City of Wasilla, ARB District 27, instead of including it with the City of Houston as proposed in MSB

District 11 where it is more socioeconomically integrated. A true and correct copy of proposed MSB District 11 is attached hereto as Exhibit P. See also Exhibit C, p. 44.

59. Meadow Lakes is the area located North of the Parks Highway between the western city limits of Wasilla and the Eastern city limits of Houston. This area is largely residential and recreational and is therefore more socioeconomically integrated with the City of Houston than the considerably more urban City of Wasilla. For example, residents of Meadow Lakes are not serviced by city water/sewer utility and instead rely on private septic systems like the residents in the City of Houston area. Conversely, the Tanaina precinct is an extension of the City of Wasilla where Wasilla Main Street turns into Wasilla Fishhook Road. Meadow Lakes' rural location also means that it is more difficult for residents to easily travel to the city center in Wasilla.

60. ARB District 30 includes the City of Houston, the most southern neighborhoods in the Knik/Goose Bay area, not including Big Lake, and stretches North along the Parks Highway to encompass the entirety of the Denali Borough except Cantwell. This configuration raises a number of issues. See Exhibit C, p. 47.

61. First, this causes ARB District 26 to be drawn to include Big Lake, almost the entire Knik Goose Bay Road, and Fairview areas. See Exhibit G, p. 1 and Exhibit C, p. 43.

62. Combining all of these areas is not proper because there are other, more practical pairings that provide for greater socio-economic integration. The Palmer-Wasilla Highway and the Parks Highway corridor are considered the economic center of MSB. The Fairview area, located just to the West of the S. Glenn Highway and South of the Parks Highway, is associated with this core area of Parks Highway before becoming more residential as Fairview Loop follows its South-Western trajectory and eventually links to S. Knik Goose Bay Road. Proposed MSB

District 14 kept that economic core area together and then created MSB District 12 to combine the
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more residential areas of Knik Goose Bay Road and Big Lake. True and correct copies of proposed MSB Districts 12 and 14 are attached hereto as Exhibits Q and R, respectively.

63. Second, in drawing ARB District 30, ARB disregarded and cut both the Denali and Mat-Su Borough boundary lines in order to allocate the residents of Cantwell into the rural ARB District 36. This was done in such a way that it shows an obvious effort to make this appendage of ARB District 36 less harsh and more geographically acceptable, in terms of contiguity and compactness, by allocating Census blocks from the MSB into the Cantwell area to create the final appendage. A true and correct copy of proposed MSB District 16 is attached hereto as Exhibit S. See also Exhibit P, Exhibit G, p. 2, and Exhibit C, p. 47.

64. When removing Cantwell, ARB also removed the road system and some residents from the northernmost MSB boundary. This creates similar situation to the Valdez issue described previously, where a voter would have to leave their district to cross ARB District 36 before reentering their district to reach their representative. Attached as Exhibit T is a true and correct copy of a graphic showing the Cantwell appendage created for ARB District 36.

65. Further, Cantwell has been historically paired with the Denali Borough due to its socioeconomic integration with the communities along the Parks Highway. Breaking the Borough boundary and removing the area to a rural interior district is not proper. See Exhibit L.

66. It is my analysis and opinion that the ARB has no defensible justification for overpopulating in the MSB, especially given the strength of the technology used to draw boundaries today which allows for more practicable review and lesser deviations.

67. The ARB should be forced to reconsider the previous submittal from the MSB which was the result of significant work conducted over the last five years by the MSB in

preparation for the 2020 census and subsequent redistricting process. The MSB proposed districts demonstrate a consensus of how its residents live, work, and recreate.

68. The ARB's Final Plan improperly split boundaries making House Districts that were not compact or contiguous, failed to account for socio-economic integration, and created the egregious underrepresentation of the MSB, which is the State of Alaska's fastest growing region.

69. The ARB is charged with looking at the State as a whole, and not favoring one area over another. Particularly as something may seem fair in a singular House district but not be equitable Statewide. The ARB failed to treat the State in an even-handed manner.

70. Early in the redistricting process, directives asserted by board members, the board chairman, and through guidance of ARB legal counsel, regarding levels of acceptable deviation per district, were unsubstantiated, and in my experience, not legally defensible as compact, contiguous, or socio-economically integrated.

71. The ARB considered the Voting Rights Act first and then turned to the necessary factors in Alaska, turning the process on its head.

72. In addition, the ARB admittedly went to great lengths to maintain the boundaries of the Fairbanks North Star Borough.

73. Given the choice between adopted ARB v. 1 and ARB v. 2, MSB provided public comment that ARB v. 2 was the closer of the two to addressing the MSB goals of having 6 districts within MSB, which included the Denali Borough, did not encompass the areas to the South in Anchorage, and did not include Valdez. This map includes Valdez with the Pipeline corridor along with Glennallen and the Richardson Highway communities. Attached as Exhibit U are true and correct copies of selected maps from the ARB Board Composite v. 2 showing the boundaries of the districts in MSB and location of Valdez.

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74. ARB's final Proclamation Plan is completely different. It severely overpopulates the MSB districts and includes Valdez, while eliminating Glennallen and the other communities in between the MSB and Valdez on the Richardson Highway. In the core area of the MSB it also significantly changes the Greater Palmer, Wasilla, and Houston areas. All of which was decided without further public comment or consideration of the changes to the area and subsequent statewide impacts.

75. ARB's Final Proclamation Plan resulted in the overpopulation of MSB by 2,520 people. The acceptable total population in urban MSB should have been within the range of plus or minus 500 persons Borough-wide, or 60-90 persons in each district, given the mapping technology in use and the other plans reviewed by ARB, which demonstrated that this level of deviation was achievable with all other constitutional criteria for redistricting properly considered.

76. This was further demonstrated by at least four other plans reviewed by the ARB that show that 1% deviation is possible.

77. The Board Chairman established early on that that he would not support a plan where the Fairbanks boundary would be broken. This was asserted before any meaningful analysis and process was considered by ARB. It established a discussion based around wants, not the actual population gains and losses of each census area. This one continuous action delayed the consideration of real alternatives and ultimately resulted in the last-minute stuffing of population into the MSB districts. This limited discussion amongst board members, and allowed for boundary definitions and manipulation of districts based around preserving rural special interests.

78. The MSB was the last region considered in the ARB final process in a hasty fashion, when it probably should have been the first considering its huge population growth. The net result

of the ARB member's individual agendas, and late negotiations amongst them to allow the opening
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of the rural portions of Fairbanks in exchange for a bizarrely shaped Rural district with odd appendages, was disastrous for the residents of the MSB.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



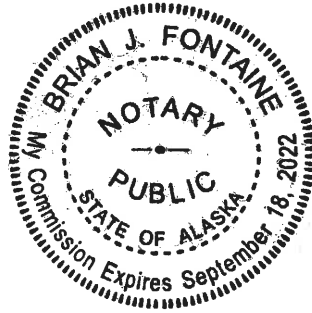
Steve Colligan

SUBSCRIBED AND SWORN TO before me this 18th day of January, 2022 at Anchorage, Alaska.



Notary Public in and for Alaska

My Commission Expires: 9-18-2022



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