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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

MSB/BROWN DIRECT TESTIMONY
AFFIDAVIT OF MICHAEL BROWN

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

MICHAEL BROWN, 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. I am a resident of Palmer, Alaska within the Matanuska-Susitna Borough ("MSB"). According to the Final Plan adopted by the Alaska Redistricting Board, my residence lies within District 29.



3. I currently serve as the Manager of the MSB. The Manager is the chief administrative officer of the MSB, and is responsible for the proper administration of all MSB affairs and implementation of MSB policy as established by the Assembly.

4. On September 7, 2021, the MSB Assembly authorized submittal of a proposed plan to the Alaska Redistricting Board ("Board"). ARB005973-ARB005974. Therein, the MSB Assembly recognized the target district population based on the 2020 Census, and therefore based on such Census, the Borough is entitled to 5.84 district house seats. As the Manager, I was directed to develop and present a proposed plan that allocated the MSB six house districts, partnering with the Denali Borough to minimize districts that cross other Borough boundaries.

5. On September 14, 2021, I submitted written testimony to the Board. ARB005969. That written testimony included a proposed plan, but also provided notice to the Board that the MSB was amenable to the Board's adopted proposed plan version 2.

6. The MSB notified the Board that if population was to be gathered outside of the Borough, that the MSB desired the same to occur to the east where the district does not extend into a separate municipality or other political boundary.

7. On October 25, 2021, I provided verbal testimony to the Board in Palmer. ARB002011. In my testimony I reiterated the desire of the MSB to be partnered with the Denali Borough.

8. The MSB proposed a plan that incorporated the entirety of the MSB, the Denali Borough, reaching only just outside the MSB to create an eastern district along the Glenn Highway.

9. I highlighted to the Board that partnering with Valdez would fail to meet with the constitutional requirements, as it would only be taking from the MSB to make another district whole, not considering the interests of the individuals residing in the MSB.

10. As a resident of District 29, my area has been included with Valdez. Therefore, unlike my neighbors in District 25 who get to vote with their fellow Palmer residents, I am combined with residents from Valdez with wholly different socio-economics. Thus residents with vastly different priorities dilute my vote and representation.

11. In House District 29 as included in the Final Plan, the portions of the MSB combined with Valdez share no social concerns, political needs, are geographically divided, culturally and historically distinct, have no transportation links, and no shared economic activities. This District ignores logical, municipal, and natural boundaries.

12. The MSB is the railbelt. We are on the road system and do not serve as a coastline community. This unlike Valdez who is a coastline community and relies heavily on their maritime economics and infrastructure. For instance, where Valdez has a significant interest in the marine highway system, the MSB has little to none.

13. Like our neighbors to the north in the Denali Borough, we border on the Parks Highway. Recreation and tourism interests are shared between our two Boroughs. Being coupled with the Denali Borough provides for districts that are contiguous and compact, and because each Borough is socio-economically integrated, the resulting districts are socio-economically integrated.

14. The United States census data demonstrates that over the past 30 years, the population in the MSB has steadily increased. In 1990, Alaska had a population of 550,043 residents with 39,683 residents residing in the MSB. In 2000, Alaska had a population of 626,932 residents, with 59,332 residents residing in the MSB, representing 26 percent of the statewide population growth. In 2010, Alaska had a population of 710,231 residents, with 88,995 residents residing in the MSB, representing 36 percent of the statewide population growth. In 2020, Alaska had a population of 733,391 residents, with 107,081 residents residing in the MSB, representing 78 percent of the statewide population growth.

15. The Board's Final Plan creates seven House districts statewide that are overpopulated by over 2% deviation over the ideal quotient, and five of the seven districts are in the MSB. Furthermore, the districts in the MSB in total have a nearly 14% aggregate overpopulation for an area that accounted for 78% of the State's total population growth in the past decade whereas Anchorage was underpopulated by an aggregate 10% deviation for a community that lost population over the past decade. The Mat-Su Borough has consistently grown for over 40 years and this growth will

very likely continue into the foreseeable future. Therefore, my vote is further diluted given the significant overpopulation of each District that sits within the MSB.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

MB

Michael Brown

SUBSCRIBED AND SWORN TO before me this 5th day of January 20~~22~~ at
Palmer Anchorage, Alaska.



Kelly Beatriz

Notary Public in and for Alaska

My Commission Expires: 3/8/2024

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 5th day of January, 2022, a true and correct copy of the foregoing document was served via Email to:

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