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-21-08869CI

AFFIDAVIT OF PETER TORKELSON

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Peter Torkelson, being first duly sworn, depose and state as follows:

1. My name is Peter Torkelson, and I am the age of majority. The following testimony is based on my personal knowledge.

2. I am the Executive Director of the Alaska Redistricting Board.

3. To respond to the Girdwood Plaintiffs' legal challenges to Senate District E, I reviewed the voting-age populations of the voting precincts that comprise House Districts 9, 10, 11, and 13.

4. Attached to this affidavit as **Exhibit A** is a spreadsheet I compiled of the voting-age population (VAP) of every house district in the Board's April 2022 Amended Redistricting Plan. The VAPs are taken directly from the 2020 U.S. Census data. The house district numbers and senate district letters are taken from the Board's April 2022 Amended Redistricting Plan. I performed the remainder of the calculations.

5. According to the 2020 U.S. Census (which provides VAPs of blocks and

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precincts), the area encompassing the Girdwood Community Council (also known as the Girdwood Board of Supervisors) has a total population of 2,144 residents and a VAP of 1,722. To obtain the total population and VAP of "Girdwood," which is not a separate incorporated area of the Municipality of Anchorage, I used the Anchorage Municipal boundary for the Girdwood Community Council. A map and shapefile download are available from a portal on the Municipal website:

I loaded this shapefile into Autobound Edge, and then selected all U.S. census blocks that were wholly within the boundaries of the community council, as well as all census blocks that spanned the boundaries of the community council. In other words, to gather all of the population of those residing within the boundaries of the Girdwood

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Community Council using 2020 U.S. Census data, I had to include some geography from outside the Girdwood boundary because the U.S. Census blocks do not perfectly correspond to the boundaries of the community council. The area from which the population numbers were taken is shown below:

6. House District 9 has a total population of 18,284, and voting-age population of 13,957. Girdwood's voting age population comprises 12.34% of House District 9's total VAP.

7. House District 10 has a total population of 18,205 and VAP of 13,241. When combined with House District 9 to create Senate District E, the total VAP of

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Senate District E is 27,198. Girdwood's VAP of 1,722 is 6.33% of Senate District E's VAP.

8. As demonstrated in **Exhibit A**, if House District 9 were paired with House District 13 (13,986 VAP), as shown in the Board's proposed plan "Option 2," Girdwood's VAP drops to 6.16% of that hypothetical senate district. If House District 9 were paired with House District 11 (13,701 VAP), as was suggested in the unanimously withdrawn Board proposed plan "Option 1," Girdwood's proportion of the VAP drops to 6.23% of that hypothetical senate district.

9. I reviewed the 2020 U.S. Census results for the VAPs of all of Alaska's 40 house districts. There are only five house districts across the state that would give Girdwood more proportional control over their senator: House Districts 20 (Mountain View), 26 (Mat-Su Borough), 38 (Bethel), 39 (Nome), and 40 (North Slope and Northwest Arctic Borough). None of these districts touch House District 9.

10. To further examine the Girdwood Plaintiffs' allegations of an equal protection violation, I looked to election returns from Alaska's 2018 statewide elections[1] for U.S. Representative and Alaska Governor.[2] Those statewide official results are available online on Alaska's Division of Elections' website at the following

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[1] Election returns from 2020 do not provide reliable precinct-level data because of the exceptionally high rates of absentee voting that took place during the coronavirus pandemic. The Alaska Division of Elections does not report absentee returns by precinct, making 2020 returns an unreliable data source for precinct electoral preferences.

[2] Election result percentages will not total 100% as write-in and third-party votes were included in the total vote count, but not individually noted.

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URL: https://www.elections.alaska.gov/results/18GENR/index.php

11. Attached to this affidavit as **Exhibit B** is a spreadsheet I compiled from the State of Alaska's official 2018 election results available at the link above.

12. To create the tables in **Exhibit B**, I first overlaid existing 2013 Proclamation Plan voting precincts boundaries onto the new 2022 House district map. I then noted each voting precinct which was contained within a new 2022 House district.[3]

1. Precinct lines and labels overlaid on the 2022 Proclamation House Plan. Notice that Huffman No. 4 Precinct is substantially split between Districts 11 & 9. Therefore, Huffman No. 4 results were not included in Exhibit B's election results tabulation.

[3] Only two precincts returns were tabulated that were substantially, but not wholly, contained within a new April 2022 Amended Redistricting Plan house district. These exceptions are noted in the exhibit footnotes.

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13. I then turned to precinct-level election results for 2013 Proclamation House Districts 14 (South Eagle River), 23 (Dimond/Taku), 24 (Oceanview), 26 (O'Malley/Abbott) and 28 (Hillside-Girdwood) and tabulated the returns for both the U.S. Representative race and the Alaska Governor's race for each noted precinct. For more precise comparisons, I omitted election results from voting precincts which are now substantially fragmented between separate 2022 House districts.

14. To measure House District 9 and 10's shared border, I started at the Board's website 2022 Map Gallery Interactive Map page, maximized the view, and selected the "Download KML" option. Opening this KML file in Google Earth allowed me to measure the shared border length. Simplifying the line by omitting the stair-step pattern through the mountains, results in a 35.3 mile shared boundary.

2. Using Google Earth's path measurement tool.

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15. I was present for all of the Board's meetings following remand, which were held from April 2 to April 13, 2022. The Board did not enter executive session during any of those meetings.

FURTHER AFFIANT SAYETH NAUGHT.

Peter Torkelson

SUBSCRIBED AND SWORN to before me this 4th day of May, 2022, at Anchorage, Alaska.

JEANNE M. HUSTON NOTARY PUBLIC STATE OF ALASKA

Notary Public in and for the State of Alaska
My Commission expires: 1-31-2024

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2022, a true and correct copy of the AFFIDAVIT OF PETER TORKELSON WITH EXHIBITS (10 pages) was served upon the following by:

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Exhibit A – 2022 April Proclamation Voting Age Population							
2022 District	**Total Pop**	**VA Persons**	**Senate Seat**	**Sen. VAP Adopted**	**Gird. % of VAP**	**Sen. VAP Option 2**	**Gird. % of VAP #2**
Girdwood	2,144	1,722					
1	17,921	13,930	A				
2	18,048	14,188	A	28,118		28,118	
3	18,195	14,154	B				
4	18,122	14,513	B	28,667		28,667	
5	18,707	14,467	C				
6	18,434	14,788	C	29,255		29,255	
7	18,465	13,816	D				
8	18,471	14,564	D	28,380		28,380	
9	**18,284**	**13,957**	**E**	**Pairing 9 & 10**		**Pairing 9 & 13**	
10	**18,205**	**13,241**	**E**	**27,198**	**6.33%**	**27,943**	**6.16%**
11	18,103	13,701	F			Pairing 11 & 12	
12	18,217	13,822	F	27,523		27,523	
13	18,523	13,986	G			Pairing 14 & 17	
14	18,185	14,342	G	28,328		29,169	
15	18,168	13,704	H			Pairing 15 & 16	
16	18,182	14,269	H	27,973		27,973	
17	18,213	14,827	I			Pairing 18 & 20	
18	18,239	14,234	I	29,061		27,310	
19	18,203	14,949	J			Pairing 19 & 23	
20	18,243	13,076	J	28,025		29,079	
21	18,414	14,029	K			Pairing 21 & 22	
22	18,285	13,349	K	27,378		27,378	
23	18,023	14,130	L			Pairing 10 & 24	
24	18,032	13,509	L	27,639		26,750	
25	18,822	13,846	M				
26	18,807	12,876	M	26,722		26,722	
27	18,799	13,567	N				
28	18,793	13,583	N	27,150		27,150	
29	18,780	13,593	O				
30	18,736	14,973	O	28,566		28,566	
31	18,294	14,336	P				
32	18,522	13,792	P	28,128		28,128	
33	18,500	13,457	Q				
34	18,382	13,963	Q	27,420		27,420	
35	18,367	14,343	R				
36	18,351	14,023	R	28,366		28,366	
37	18,226	14,299	S				
38	17,853	11,522	S	25,821		25,821	
39	17,453	11,120	T				
40	18,824	13,165	T	24,285		24,285	

Exhibit B – 2018 Election Results by Precinct

	2022 District		U.S. Represenatative			Split			Governor			Spilt	
2013 Precincts in 2022 District 9 (Hillside)			**Galvin**	**Young**	**Total**	**Galvin**	**Young**		**Begich**	**Dunleavy**	**Total**	**Begich**	**Dunleavy**
– 28-105 Rabbit Creek #1	9		320	385	707	45.26%	54.46%		305	373	710	42.96%	52.54%
– 28-110 Rabbit Creek #2	9		499	685	1186	42.07%	57.76%		495	671	1183	41.84%	56.72%
– 28-115 Huffman #6	9		284	447	731	38.85%	61.15%		275	434	728	37.77%	59.62%
– 28-120 Huffman #7	9		356	464	821	43.36%	56.52%		332	465	820	40.49%	56.71%
– 28-125 Bear Valley	9		247	279	526	46.96%	53.04%		236	279	526	44.87%	53.04%
– 28-130 Indian	9		83	59	142	58.45%	41.55%		80	55	143	55.94%	38.46%
– 28-140 Golden View	9		445	683	1128	39.45%	60.55%		454	655	1130	40.18%	57.96%
– Non-Girdwood Precinct Totals			**2234**	**3002**	**5241**	**42.63%**	**57.28%**		**2177**	**2932**	**5240**	**41.55%**	**55.95%**
– 28-135 Girdwood †	9		**598**	**193**	**793**	**75.41%**	**24.34%**		**581**	**183**	**790**	**73.54%**	**23.16%**

† Adding the preceding two rows together to gauge Girdwood's electoral influence will not result in an accurate calculation because there are portions of the new District 9 which were fragmented among other precincts not reported here

2013 Precincts in 2022 District 10 (S. Eagle River)			**Galvin**	**Young**	**Total**	**Galvin**	**Young**		**Begich**	**Dunleavy**	**Total**	**Begich**	**Dunleavy**
– 14-940 Downtown E.R. #2	10		308	519	830	37.11%	62.53%		283	514	832	34.01%	61.78%
– 14-945 Meadow Creek #1	10		228	374	607	37.56%	61.61%		207	376	605	34.21%	62.15%
– 14-955 Eagle River #1	10		145	256	403	35.98%	63.52%		129	264	406	31.77%	65.02%
– 14-960 Eagle River #2	10		378	553	938	40.30%	58.96%		352	560	943	37.33%	59.38%
– 14-965 Chugach Park #2	10		553	843	1404	39.39%	60.04%		499	860	1401	35.62%	61.38%
– 14-970 Hiland	10		335	502	841	39.83%	59.69%		300	524	845	35.50%	62.01%
– Precinct Totals			**1947**	**3047**	**5023**	**38.76%**	**60.66%**		**1770**	**3098**	**5032**	**35.17%**	**61.57%**

2013 Precincts in 2022 District 11 (Lower Hillside)			**Galvin**	**Young**	**Total**	**Galvin**	**Young**		**Begich**	**Dunleavy**	**Total**	**Begich**	**Dunleavy**
– 26-800 Independence Park No. 1	11		359	427	790	45.44%	54.05%		324	441	796	40.70%	55.40%
– 26-805 O'Malley #1	11		321	469	791	40.58%	59.29%		335	440	794	42.19%	55.42%
– 26-810 Huffman No. 3	11 & 9*		235	430	667	35.23%	64.47%		234	421	672	34.82%	62.65%
– 26-820 O'Malley No. 2	11		409	563	975	41.95%	57.74%		421	532	976	43.14%	54.51%
– 26-825 Independence Park No. 2	11		285	325	613	46.49%	53.02%		282	315	614	45.93%	51.30%
– 26-830 Elmore No. 2	11		180	208	388	46.39%	53.61%		171	214	389	43.96%	55.01%
– 28-145 O'Malley No. 4	11		318	397	716	44.41%	55.45%		327	379	716	45.67%	52.93%
– Precinct Totals			**2107**	**2819**	**4940**	**42.65%**	**57.06%**		**2094**	**2742**	**4957**	**42.24%**	**55.32%**

2013 Precincts in 2022 District 13 (Oceanview)			**Galvin**	**Young**	**Total**	**Galvin**	**Young**		**Begich**	**Dunleavy**	**Total**	**Begich**	**Dunleavy**
– 24-705 Huffman #2	13		272	326	601	45.26%	54.24%		273	316	606	45.05%	52.15%
– 24-710 Klatt	13 & 15**		381	546	927	41.10%	58.90%		379	526	927	40.88%	56.74%
– 24-715 Southport	13		342	425	770	44.42%	55.19%		345	408	772	44.69%	52.85%
– 24-720 Ocean View #1	13		333	395	728	45.74%	54.26%		329	384	731	45.01%	52.53%
– 24-725 Ocean View #2	13		395	502	903	43.74%	55.59%		398	486	908	43.83%	53.52%
– 23-770 Dimond #2	13		222	197	421	52.73%	46.79%		195	220	424	45.99%	51.89%
– Precinct Totals			**1945**	**2391**	**4350**	**44.71%**	**54.97%**		**1919**	**2340**	**4368**	**43.93%**	**53.57%**

** Precinct 26-810 contains 2,414 persons. 2,310 reside in 2022 District 11 while 104 now reside in 2022's House District 9. (2020 Census)*

*** Precinct 24-710 contains 2,424 persons. 2,153 reside in 2022 District 13 while 271 now reside in 2022's House District 15. (2020 Census)*