

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
) 4BE-21-00372 CI
)

AFFIDAVIT OF KEN WAUGH

STATE OF ALASKA)
)
THIRD JUDICIAL DISTRICT)

I, Ken Waugh, being first duly sworn under oath, depose and say:

1. I am a registered voter in the State of Alaska and the Municipality of Anchorage. I reside in Girdwood, Alaska.

2. The redistricting board continues to pursue a blatant policy of gerrymandering even after instructions by the Alaska Supreme Court to follow a different path. Once again, this Board has voted to ignore previous rulings by the court and split Eagle River into two districts to increase its representation at others' expense.

3. Eagle River is comprised of a staunchly conservative population. We, the residents of Girdwood, will suffer from this as our more moderate/independent vote will be drowned out, and we will no longer have any meaningful state representation. In fact, Eagle River has historically opposed initiatives that are supported by our community or adds to our quality of life, such as bonds.

4. In short, Girdwood residents will have no political voice, quality of life will suffer in the community, future investment in our infrastructures will dry up, while Eagle River residents will reap the benefits of enhanced representation should this redistricting plan be allowed to stand.

5. By contrast, South Anchorage is closely connected with Girdwood. I lived in South Anchorage for a long time. I commuted to Girdwood for shifts on the Fire Department and Patrol. Circumstances allowed me to move to Girdwood and my commute reversed for work. These commutes continue for many on a daily basis. Those living in Girdwood often commute to Anchorage for employment while those working in Girdwood that find housing difficult to obtain in our community live in Anchorage and commute to Girdwood for work. I know of no one who comes from or goes to Eagle River for the same reason.

6. South Anchorage and Girdwood also have a strong connection through our emergency services. We have a mutual aid agreement with the Anchorage Fire Department (“AFD”) starting at mile 100 of the Seward Highway. If AFD needs another apparatus or personnel after that mile marker, they call Girdwood (not Eagle River), and we send help. If Girdwood sends both of its ambulances to Anchorage for patient transport, an ambulance from South Anchorage comes down to Girdwood to be on standby in case it's needed. When Girdwood has a fire response that requires additional resources, or when the Girdwood Fire Department is called out to a response in Turnagain Pass leaving Girdwood unprotected, South Anchorage sends resources and back fill to assist. Many of the current AFD firefighters, paramedics, engineers, captains, battalion

chiefs and deputy chiefs started their careers with Girdwood's volunteer department, then sought full time employment in Anchorage.

7. Girdwood and the other communities along Turnagain Arm are in the South High school zone. When my daughters matriculated out of grade school, they went to South Anchorage for middle and high school—Dimond initially, then South High after it was built. When my daughters began to attend schools in Anchorage, they formed new friendships as all kids do in new grades and locations. When my daughters invited those friends out to ski or for birthday parties or just to take a limo ride, it often included children who lived in South Anchorage. So we reached out to those parents so they would feel comfortable that they could entrust the care of their child to us for the time they were in Girdwood. Often my daughters would visit or stay with those same South Anchorage friends so we, the parents, over time formed relationships as well. There has always been a flow between Girdwood and South Anchorage, between the kids that were attending those schools. Never in my recollection can the same be said for Eagle River. Buses and transportation ran down the highway, not over Crow Pass.

8. While Girdwood has a small medical clinic, all significant medical care, be it orthopedic, emergent, or behavioral health, is sought in urban Anchorage first, not Eagle River. We have a small grocery store and some sundry shops, but lumber, major food shopping, tools, clothing, virtually any retail shopping, if not done online, is done in Anchorage. I am aware of not one person in our community that travels to Eagle River for any of these things.

9. In short, there is a daily exchange of residents of both Girdwood and South Anchorage going back and forth for jobs, supplies, education, and recreation. It is a fluid exchange along a 40 mile stretch of scenic road. There is a natural awareness and mutual support that has developed between South Anchorage and Girdwood due to this flow. No one I know of thinks adding another hour or so to drive through Anchorage and continue on to Eagle River, for these same reasons, is a good idea. Girdwood is tied to South Anchorage, and they to us. We support each other financially and want to see the other's community thrive. Our political ideology is more in tune with the more moderate South Anchorage population. I can think of no valid reason to disrupt the situation that is in place and has worked in all my time in Alaska.

Ken Waugh

SUBSCRIBED AND SWORN to before me this ____ day of May, 2022.

NOTARY PUBLIC IN AND FOR ALASKA
My Commission Expires: _____

CERTIFICATE OF SERVICE

On May 5, 2022, a copy of the foregoing was served by e-mail on:

Schwabe Williamson & Wyatt

Matthew Singer

Lee Baxter

Kayla J. F. Tanner

msinger@schwabe.com

lbaxter@schwabe.com

ktanner@schwabe.com

jhuston@schwabe.com

Sonosky, Chambers, Sachse, Miller & Monkman, LLP

Nathaniel Amdur-Clark

Whitney A. Leonard

nathaniel@sonosky.net

whitney@sonosky.net

Holmes Weddle & Barcott, PC

Stacey Stone

Gregory Stein

sstone@hwb-law.com

gstein@hwb-law.com

mmilliken@hwb-law.com

State of Alaska, Department of Law

Thomas S. Flynn

Rachel Witty

thomas.flynn@alaska.gov

rachel.witty@alaska.gov

Brena, Bell & Walker, P.C.

Robin Brena

Laura S. Gould

Jake Staser

Jack Wakeland

rbrena@brenalaw.com

lgould@brenalaw.com

jstaser@brenalaw.com

mnardin@brenalaw.com

mhodsdon@brenalaw.com

jwakeland@brenalaw.com

Birch Horton Bittner & Cherot

Holly Wells

Mara Michaletz.

William D. Falsey

Zoe Danner

hwells@bhb.com

mmichaletz@bhb.com

wfalsey@bhb.com

zdanner@bhb.com

tevans@bhb.com

pcrowe@bhb.com

tmarshall@bhb.com

ASHBURN & MASON

By: s/Karina Chambers

Karina Chambers