

**IN THE SUPERIOR COURT OF THE STATE OF ALASKA**  
**FOURTH JUDICIAL DISTRICT**

In re: 2011 REDISTRICTING CASES

Consolidated Case Nos.  
4FA-11-2209CI  
4FA-11-2213CI  
1JU-11-0782CI

**CALISTA CORPORATION AND ASSOCIATION OF VILLAGE  
COUNCIL PRESIDENTS' OBJECTION TO BOARD'S NOTICE  
OF COMPLIANCE**

Calista Corporation ("Calista") is a wholly Alaska Native-owned regional corporation, formed under the Alaska Native Claims Settlement Act. The Association of Village Council Presidents ("AVCP") is a non-profit corporation whose members are 56 federally-recognized tribes in the Southwestern Alaska Region. Calista and AVCP participated as amicus curiae before the Supreme Court and, therefore, have standing to file objections pursuant to the Court's order dated April 12, 2012. Calista and AVCP will follow the format for expressing their objections as directed in that order.

1. Did the Board follow the *Hickel* process as directed by the Alaska Supreme Court?

The Board attempted to meet the spirit of the Supreme Court's order in that it fully understood it was required to start with a map that it believed best met the

**CALISTA CORPORATION**  
301 Calista Court, Anchorage, AK 99518  
Main (907) 279-5516 Fax (907) 272-5060

requirements of the Alaska Constitution.<sup>1</sup> The Board was under time pressure to complete the redistricting process on remand. Because of the Board's need for speed, it naturally fell back upon what it knew and drew from where it had been. The mechanics of building its optimally Constitutional plan were to take the original rejected Proclamation Plan and remove the offending Fairbanks districts and the Native Preference Districts that reflected the Voting Rights Act (VRA) adjustments. This left a map with white space on which it could redesign its new "constitutional" districts. See Board Exhibit E, Page 1. This mapping approach presumed that the untouched districts were already maximally constitutional.

In filling in the white spaces, the Board next chose the identity of the Fairbanks urban population group to merge with the adjacent Native district. This is where the problem started. In one of the limited sign posts provided by the Supreme Court in this case, the Court discussed the trial court's prior ruling regarding the unconstitutionality of Districts 37 and 38. They dismissed the trial court's excess Native VAP concerns, and gave import instead to the trial court's conclusion "[i]t was not a matter of whether excess population needed to be added to rural Native districts but only a matter of where to access this excess urban population." *Id. at page 7.*

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<sup>1</sup> "The *Hickel* process assures compliance with the Alaska Constitution's requirements concerning redistricting to the greatest extent possible." In Re 2011 Redistricting Cases, Supreme Court Order No. 77 at page 4, March 14, 2012, Supreme Court Case No. S-14441.

The Board included the same excess urban population group as was in the prior Proclamation Plan, (the Ester, Fox and Goldstream area), and did not test whether any other Fairbanks' population could be matched with the adjacent Native district to create a more constitutional map. The Ester/Fox/Goldstream areas were attached to the adjacent Native rural district in all Hickel process plans prepared by the Board.<sup>2</sup>

This court had previously ruled that House District ("HD") 38, containing the urban Fairbanks population and the Native area westward to the Arctic coast, violated the Alaska Constitution for "not comprising a relatively integrated socio-economic area". *Memorandum Decision and Order Re: 2011 Proclamation Plan*, February 3, 2012 at 135. Therefore, on remand, it was incumbent upon the Board to at least examine whether there were any alternative population groupings that might yield a higher level of Alaska Constitutional compliance on this important issue. Yet, during the remand hearing process, the Board made it clear that the Board, not the public, had the right to establish the base Constitutional plan.<sup>3</sup> . "[I]t's the board's position ... that the board sets the Hickel plan and then people should be working off of that plan." *Board's Exhibit B* at page 129, Tr. 50:3-

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<sup>2</sup> Presumably, the alternative of the Eielson military population group was not being considered because the Fairbanks Board member Holm was still advocating "keeping as much military population in Republican areas of the FNSB districts, which he knew would have the effect of enhancing the civilian Republican vote." *Memorandum Decision and Order Re: 2011 Proclamation Plan*, February 3, 2012 at 95.

<sup>3</sup> Notwithstanding the time pressure on the Board, it did allow third parties to submit materials for its consideration during the remand hearing process. During the re-hearing process, the Board, discussed and reviewed third party plans, but third parties were not allowed to make presentations on the record.

5 (March 29, 2012). Hence, the process to review and improve the constitutionality of the Fairbanks' urban population pairing never happened.

The Board's attorney stated that the Board's actions in this regard were justified by the fact that the trial court had previously found that removing a portion of the excess Fairbanks' urban population was a reasonable choice. See Board's Exhibit F "*Memorandum of Board Counsel re: Analysis of Hickel Plans*" at page 3. The Board's reliance was ill placed because the court's finding on this issue was considerably more contingent than was assumed by the Board. The trial court found, "The Proclamation Plan does not unreasonably take excess population from the Fairbanks area if required by the necessity of compliance with the VRA and the choice is in harmony with the Alaska Constitution." "*Memorandum Decision and Order Re: 2011 Proclamation Plan*", February 3, 2012 at 134, (*emphasis added*). The court found that selection of some portion of the Fairbanks population, as opposed to other parts of the state, was a reasonable choice for meeting the constitutional requirements based upon the Board's alternatives. But the court did not need to make findings on the merits of the specific urban Fairbanks population selection, because the court ultimately concluded that the joinder of this Fairbanks population with the adjacent Native populations violated the Alaska Constitution. Therefore, the Board's adherence to their prior Fairbanks population match without further review or changes did not comply with the Supreme Court's order to go back and establish an optimally constitutional map at the outset of the remand process in accordance with Hickel.

The Board's subsequent testing of alternative urban population match-ups with populations from Mat-Su, Anchorage and Kenai demonstrates the Board knew it was not locked into a singular approach in solving the urban-rural population match-up problem. The Board's failure to test other urban Fairbanks options shows they did not fully embrace the Hickel process.

Had the Hickel process been fully adopted in the development of the plan for the Fairbanks districts, the result would have produced a plan that matched an Eielson Air Force Base population south of the Fairbanks city center, rather than the area immediately west of Fairbanks. This map arose late in the hearing process when Calista became aware of an offer by the plaintiffs to settle the redistricting litigation if a map were drawn making this population change to the Amended Proclamation Plan. Calista and AVCP, keen to see a timely, successful conclusion to the redistricting process, mapped the requested change on their own to determine whether such a change would result in a betterment of the Plan's constitutional compliance and its impact on HD 38 under the VRA. To Calista's and AVCP's surprise, the map minimized constitutional deviation and improved HD 38 metrics under the VRA.

Calista and AVCP submitted the results of the mapping exercise to the Board's executive director and attorney on April 4, 2012 ("4/4 Settlement Plan")(Map and population data attached as Exhibit A). The 4/4 Settlement Plan was identical in all respects to the Board's Amended Proclamation Plan except for the Fairbanks urban-rural population pairing differences. The 4/4 Settlement Plan

left the Fairbanks City center districts untouched, and, like the Amended Proclamation Plan, it broke the Fairbanks Northstar Borough boundary only once. The Board did not discuss the 4/4 Settlement Plan other than to mention its receipt during the Board's hearing on April 5, 2012.

Calista and AVCP had not previously consulted with the Plaintiffs to determine if the 4/4 Settlement Plan met the needs of that group, but did so after April 5, and learned that a few minor boundary changes were required in order for plaintiffs to support it. Calista made the minor changes, and submitted that second plan to the Plaintiffs on April 10, 2012, and to the Board's attorney and Executive Director on April 11, 2012 ("*4/10 Settlement Plan*"). (*Map and population data attached as Exhibit B*). The 4/10 Settlement Plan, like the 4/4 Plan, was identical in all respects to the Board's Amended Proclamation Plan except for the Fairbanks urban-rural population pairing differences. The 4/10 Settlement Plan left the Fairbanks City center districts untouched, and broke the Fairbanks Northstar Borough boundary only once. Surprisingly, the minor changes contained in the 4/10 Settlement Plan improved even further the constitutionality of the plan and its compliance with VRA.

The following chart compares the five Fairbanks house districts under the Amended Proclamation Plan, the 4/4 Settlement Plan and the 4/10 Settlement Plan.

**Percent Population Deviation from Ideal**

Districts	Amended Proc Plan	4/4 Settlement Plan	4/10 Settlement Plan
1	3.34	3.78	3.52
2	3.72	2.95	3.10
3	3.71	3.71	3.71
4	3.29	3.28	3.28
5	3.12	3.34	3.44
Deviation of Total Map	9.05	9.11	9.04
Deviation among 5 FBX districts	0.60	0.83	0.43
Number of Districts that exceed +/- 5%	3	2	2

From this chart, when comparing the Amended Proclamation Plan to the 4/10 Settlement Plan, one can see that the population deviation for the entire plan was reduced, and the deviation among the five urban Fairbanks house districts dropped materially from 0.60 to 0.43. In addition, the total number of districts that exceeded the constitutional population deviation threshold of -5% was reduced from three to two. These improvements are important under the Alaska Constitution as they are indications of the degree to which the plan honors the constitutional equal protection right of “one citizen-one vote”.

The Supreme Court in *In re 2001 Redistricting Cases*, 44 P3d 141 (Alaska 2002) held that the Board had erroneously assumed that deviations within plus or minus 5% automatically satisfied the constitutional requirements and that the Board

acted improperly when it failed to make any further attempts to minimize the deviations within Anchorage. The court first noted that “[n]ewly available technology advances ... make it practicable to achieve deviations substantially below the ten percent federal threshold, particularly in urban areas.” *Id* at 46. The court went on to state that for a deviation to stand against constitutional challenge, the board must "demonstrate that further minimizing the deviations would have been impracticable in light of competing requirements imposed under federal or state law.” *Id. at 146.*

In the case at hand, the Board was provided with two plans that did, in fact, further minimize the population deviations among the Fairbanks districts as well as the total map. Yet, the Board declined to adopt the improvements, presumably, because of timing concerns. The constitutional rights of Alaska’s citizens do not have an expiration date, and getting the redistricting plan right for use over the next decade outweighs the inconvenience of delay if a constitutionally-superior plan is ultimately adopted.

The result of the Board’s decision not to consider these improvements in its Amended Proclamation Plan was that it adopted a plan that it knew was inferior in its constitutional compliance. The process of delineating the Fairbanks districts and its joinder to the adjacent Native preference district did not meet the *Hickel* standard.



2. Were the Board's deviations from the Alaska Constitution justified by the Voting Rights Act?

The constitutionally-inferior Amended Proclamation Plan was not required as a result of compliance with the VRA. The table below compares the Native Voting Age Population ("Native VAP") and percent of population deviation from the mathematically ideal district population of 17,755 for the 5 Effective Native Districts associated with the Amended Proclamation Plan, the 4/4 Settlement Plan and the 4/10 Settlement Plan.

**Alaska Native Voting Age and % Population Deviation**

District	Amended Proclamation Plan		4/4 Settlement Plan		4/10 Settlement Plan	
	Native VAP	% Pop. Deviation	Native VAP	% Pop. Deviation	Native VAP	% Pop. Deviation
35	17.55	-4.53	17.34	-4.53	17.34	-4.53
36	81.13	-5.33	81.00	-5.33	81.00	-5.33
37	42.97	0.59	42.88	0.59	42.88	0.59
38	45.72	-5.09	46.33	-4.97	46.42	-4.95
39	65.63	-5.23	65.52	-5.23	65.52	-5.23
40	62.77	-4.52	62.71	-4.52	62.71	-4.52

From this chart, the court can see that the VRA metrics are worse under the Amended Proclamation Plan. In the Amended Proclamation Plan, the Native VAP for HD 38 is 45.72%. In fact, the Native VAP in HD 38 actually worsened in the Amended Proclamation from its 46.36% level in the Board's first Proclamation

Plan.<sup>4</sup> Under the 4/10 Settlement Plan, the Native VAP in HD 38 is 46.42%, higher than either Board Proclamation Plans. In addition, HD 38 under the Amended Proclamation Plan has a population deviation that exceeds the 5% threshold at -5.09% as compared to the 4/10 Settlement Plan at -4.95%. The constitutionally-inferior Amended Proclamation Plan cannot point to the VRA as its justification for exceeding the bounds of the Alaska Constitution. The VRA requirements can be met better by a plan that does less harm to the Alaska Constitution; namely, the 4/10 Settlement Plan.

Calista and AVCP are confident that the 4/10 Settlement Plan is superior to the Amended Proclamation Plan under the VRA in several other key respects. Prior uncontroverted testimony before this court established that the Fairbanks urban areas included by the Board within HD 38 had very high voter turnout, higher than the associated Native rural vote. *See Day Two, Trial Log Notes at 12:31:50, 12:42:16-26.* In contrast, Eielson Air Force Base had a much lower voter turn out. *See Trial Testimony of Bickford.* Therefore, there is less opposition to the Native voters to achieve their voting aims in a district where they are joined with a population from Eielson rather than western Fairbanks area.

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<sup>4</sup> This may be a problem for the Board when it seeks preclearance for the new plan if the Department of Justice concludes that the previously cleared Proclamation Plan is the new benchmark for its second VRA analysis. See Board Exhibit G, page 1, footnote 2, citing Department of Justice guidance: "Once a legislative plan has been precleared by the US Department of Justice it serves as the Benchmark Plan unless the plan is subsequently found to be unconstitutional by a Federal court. ( Federal Register, Vol. 76, No. 27, Wednesday, February 9, 2011".

The Board's VRA expert reaffirmed that population trends are important. The Board's Executive Director passed on the expert's concerns regarding a plan alternative that paired the Bethel district with an Anchorage district for a senate seat. "[W]hen Bethel is losing population and Anchorage is gaining population, you might run into some Voting Rights Act issues with that Senate pairing also..." *March 31, 2012 Board Meeting Transcript* at page 17 line 12 (Board Exhibit B at page 194). Unlike the urban area due west of the City of Fairbanks, Eielson Air Force Base is expected to decrease in population over the coming years. Evidence from the Board's Voting Rights expert revealed a continuing decrease of Native population through out-migration in the Wade Hampton and Doyon regions of HD 38. Thus, the Native populations in HD 38 will be more stressed over time to maintain the Native effectiveness of this district. Pairing the rural area with an ebbing urban non-Native population in contrast to one that is expected to continue to grow will directionally improve the strength over time of this Native district under the VRA.

The Eielson area pairing had the support of the Board's own VRA expert. The court noted in its decision after the earlier trial, that the Board's VRA expert testified "that she would not be concerned about adding military population to the rural district because it would not harm the effectiveness of the Native vote." See "*Memorandum Decision and Order Re: 2011 Proclamation Plan*", February 3, 2012 at 95.

Calista and AVCP have had insufficient time to obtain the formal analysis of a voting rights expert on the other VRA aspects of the 4/10 Settlement Plan. However, the

better choice of the Fairbanks urban population group to join with the Native regions of HD 38 to yield a superior VRA result is not difficult to deduce.

HD 38 under the Board's adopted plan raises two additional VRA concerns: (1) the pairing of a Native-preferred legislator with another incumbent legislator, and (2) the high risk of polarized racial voting in HD 38<sup>5</sup>. A fact that was overlooked by all Board members and staff is that Representative Dick is the Yupik-preferred incumbent from Lime Village in what is currently HD 6. Board Exhibit B at page 199, March 31, 2012 Board Meeting Transcript, page 35, line 23. This oversight is because of the blind spot in Department of Justice and VRA analysis procedures that ignores the cultural and regional differences among Alaska Native populations. The Board's prior VRA analysis of the HD 6 election involving Alan Dick did not take into account that the 35% bloc of Alaska Native voters within HD6 who voted for Mr. Dick were Yupik. Rep. Dick's wife is Alaska Native from a village within the Calista Region and he has been a long standing, respected educator in the Yupik Native community. The other 65% of HD 6's Native voters were from Athabascan communities and they supported their Athabascan incumbent, Rep. Woody Salmon.<sup>6</sup> The conclusion of the Board's

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<sup>5</sup> "The U.S. Supreme Court held that racially-polarized voting refers to the "existence of a correlation between the race of voters and the selection of certain candidates." *Thornburg v. Gingles*, 478 U.S. 30, 74, 106 S.Ct. 2752, 2778. (1986)."

<sup>6</sup> The Board's expert report on the Board's first Proclamation Plan noted that Benchmark HD 6 was no more, and had been dissolved into the new HD 39 which had a 67.09% Native VAP and would no longer be vulnerable to the racial polarization of past elections. *A Voting Rights Analysis of the Proposed Alaska State Legislative Plans: Measuring the Degree of Racial*

(continued . . .)

VRA expert that Mr. Dick was not a Native preferred candidate in this election is wrong, and should provide no basis in the VRA analysis about the future performance of HD 38. Rep. Dick will be running in a predominantly Yupik Native Effective District in 2012 and should be considered a Native preferred candidate for purposes of the VRA analysis.

Under the Amended Proclamation Plan, Rep. Dick would be placed in HD 36 with another Native preferred incumbent, Rep. Edgmon. As a measure of self preservation, Rep. Dick has stated his current intention to run for re-election from his other home in Nenana for the new predominantly Yupik HD 38 seat, which will place him in conflict with the other incumbent, Rep. Guttenberg. Therefore, a Native preferred candidate is being forced to choose between two districts in which he faces an incumbent. Under the 4/4 and 4/10 Settlement Plans, this situation is avoided, because HD 38 is an empty house seat in which Rep. Dick can run without facing an incumbent.

Polarized racial voting is likely to rear its ugly head in 2012 in HD 38 under the Board's Amended Proclamation Plan and it does not appear that this situation has been properly assessed by the Board's VRA expert. To date, no written report by the Board's VRA expert setting forth her VRA analysis of the Amended Proclamation Plan has been made available. Calista and AVCP cannot

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(. . . continued)

*Bloc Voting and Determining the Effectiveness of Proposed Minority Districts*", Dr. Lisa Handley, Board's Trial Exhibit J40at FN 21, page 29 (ARB 00013357)

determine if the expert performed a reconstructed precinct analysis which is needed since the newly created HD38 has no prior election data. This analysis theoretically would enable the statistical prediction of the likelihood of racially polarized voting and establish more accurately the probable minimum level of Native VAP required for the Native populations to succeed in electing their preferred candidates.<sup>7</sup> However, given the fact that precinct and polling data is unavailable for almost all of the rural communities, it may be that the statistical data approach will be less helpful and perhaps more misleading than the anecdotal knowledge of the actual election behavior in the specific Native communities at issue.

What is known is that in the Amended Proclamation Plan, two incumbents will battle it out—one a Yupik-preferred incumbent reaching out to a new majority group of Yupik constituents and a new minority group of Athabascan constituents, and the other a longstanding non-Native incumbent with strong support from his non-Native Fairbanks constituents located in precincts with some of the highest voter turnouts in the state. Because the Board’s VRA expert has already identified polarized voting as endemic in this large swath of sparsely-populated land

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<sup>7</sup> The District of Columbia Court of Appeals recently struck down the Texas Redistricting Plan under the VRA for attempting to establish minority preference districts using only minority VAP data. “Section 5 requires a multi-factored, functional approach to gauge whether a redistricting plan will have the effect of denying...minority citizens’ ability to elect representatives of their choice.” *Texas v. Holder*, Civ Action No. 11-1303 at page 43 (TBG-RMC-BAH) (Memorandum Decision, Dec. 22, 2011).

currently known as HD 6<sup>8</sup>, Calista and AVCP have grave concerns that the rights of the Alaska Natives in the new HD 38 to participate in the political process and elect representatives of their choice will be seriously compromised. Again, the 4/4 and 4/10 Settlement Plans avoid this problem and remove the concerns for racial bloc voting by not pitting these two incumbents against one another, and by removing most of the Ester/Fox/ Goldstream areas from the Effective Native HD 38.

These issues should certainly have given rise to deeper inquiry as the Board struggled to meet its VRA obligations. However, it does not appear that the Board ever performed any election analysis on the two Settlement plans nor did it send the Settlement plans to its VRA expert for analysis. The 4/4 and 4/10 Settlement Plans with their more positive VRA impacts raise reasonable doubt about whether the Board's Amended Proclamation Plan needed to deviate from the Alaska Constitution as much as it did to meet the VRA requirements.

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<sup>8</sup> "The [2008] election in District 6 was heavily polarized." *A Voting Rights Analysis of the Proposed Alaska State Legislative Plans: Measuring the Degree of Racial Bloc Voting and Determining the Effectiveness of Proposed Minority Districts*, Dr. Lisa Handley, Board's Trial Exhibit J40 (ARB 00013333)

## CONCLUSION

The two Settlement Plans demonstrate that the Board's Amended Proclamation Plan deviated needlessly from the Alaska Constitution, and we assert this excess was not justified by any requirements of the Voting Rights Act.

For the reasons presented herein, Calista and AVCP respectfully request that the Court deny the Board's Notice of Compliance and Request for Entry of Judgment and require the adoption of the 4/10 Settlement Plan.

DATED at Anchorage, Alaska this 16th day of April, 2012.

CALISTA CORPORATION



Marcia R. Davis  
General Counsel  
ABA No. 8211172

ASSOCIATION OF VILLAGE  
COUNCIL PRESIDENTS



Carol J. Brown (*Pro Hac Vice*)  
Wisc. State Bar #: 1021452

CALISTA CORPORATION  
301 Calista Court, Anchorage, AK 99518  
Main (907) 279-5516 Fax (907) 272-5060




**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the on the 16th day of April 2012, a true and correct copy of the **MOTION AND MEMORANDUM IN SUPPORT OF LEAVE FOR CALISTA CORPORATION AND ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS TO PARTICIPATE AS AMICUS CURIAE** was sent by electronic mail to:

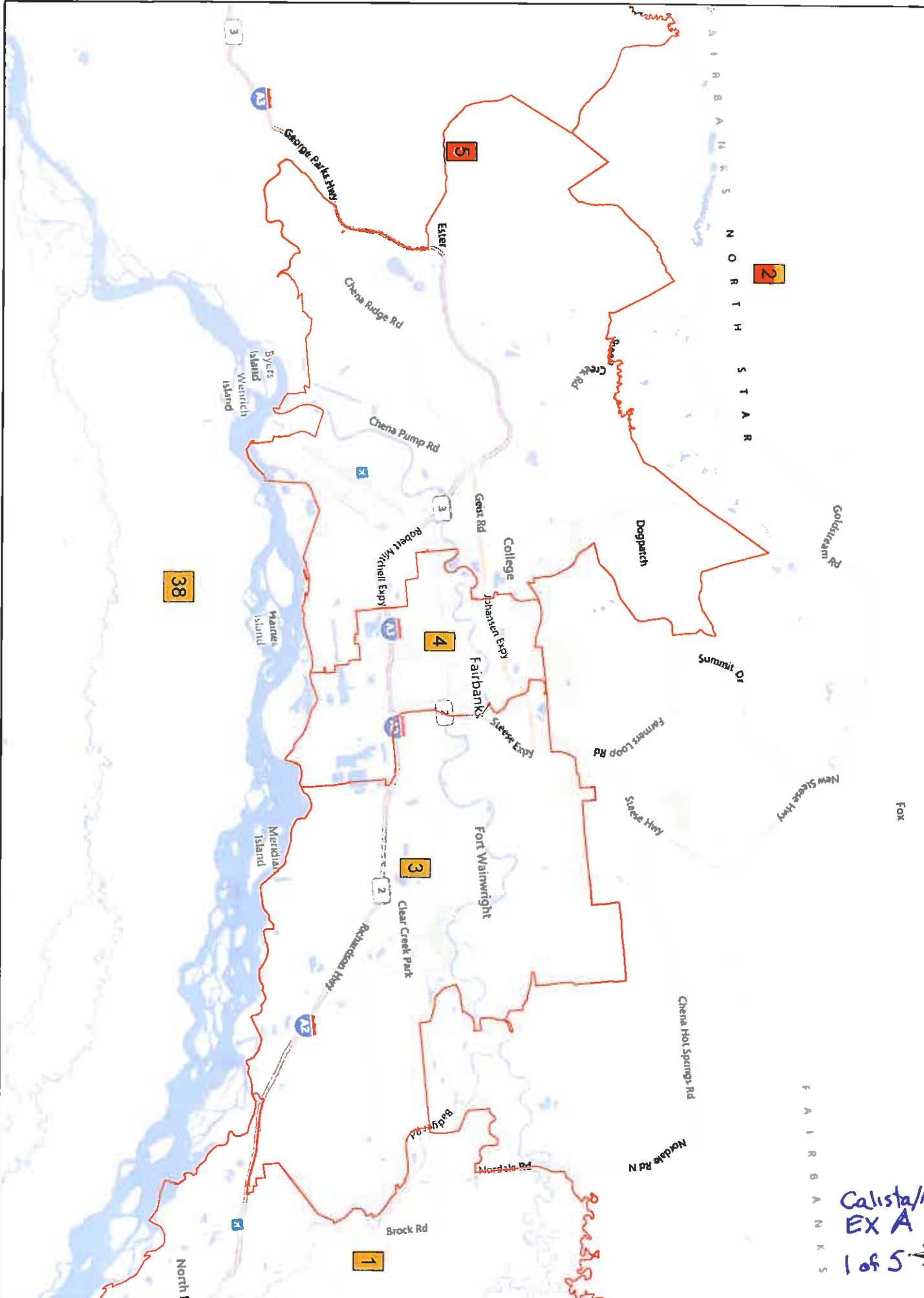
Office of the Clerk, Fairbanks	<a href="mailto:4faclerk@courts.state.ak.us">4faclerk@courts.state.ak.us</a>
Karen Erickson	<a href="mailto:kerickson@courts.state.ak.us">kerickson@courts.state.ak.us</a>
Kelly Krug	<a href="mailto:kkrug@courts.state.ak.us">kkrug@courts.state.ak.us</a>
Michael White	<a href="mailto:MWhite@PattonBoggs.com">MWhite@PattonBoggs.com</a>
Michael Walleri	<a href="mailto:walleri@gci.net">walleri@gci.net</a>
Thomas Klinkner	<a href="mailto:tklinkner@bhb.com">tklinkner@bhb.com</a>
Jill Dolan	<a href="mailto:jdolan@co.fairbanks.ak.us">jdolan@co.fairbanks.ak.us</a>
Joe Levesque	<a href="mailto:Joe-wwa@ak.net">Joe-wwa@ak.net</a>
Natalie Landreth	<a href="mailto:Landreth@narf.org">Landreth@narf.org</a>
Scott A. Brandt-Erichsen	<a href="mailto:scottb@kgbak.us">scottb@kgbak.us</a>

**CALISTA CORPORATION**  
301 Calista Court, Anchorage, AK 99518  
Main (907) 279-5516 Fax (907) 272-5060

By: 

Marva Weeden  
Calista Administrative Assistant

# Fairbanks Alternative 4/4 Settlement Plan version 1

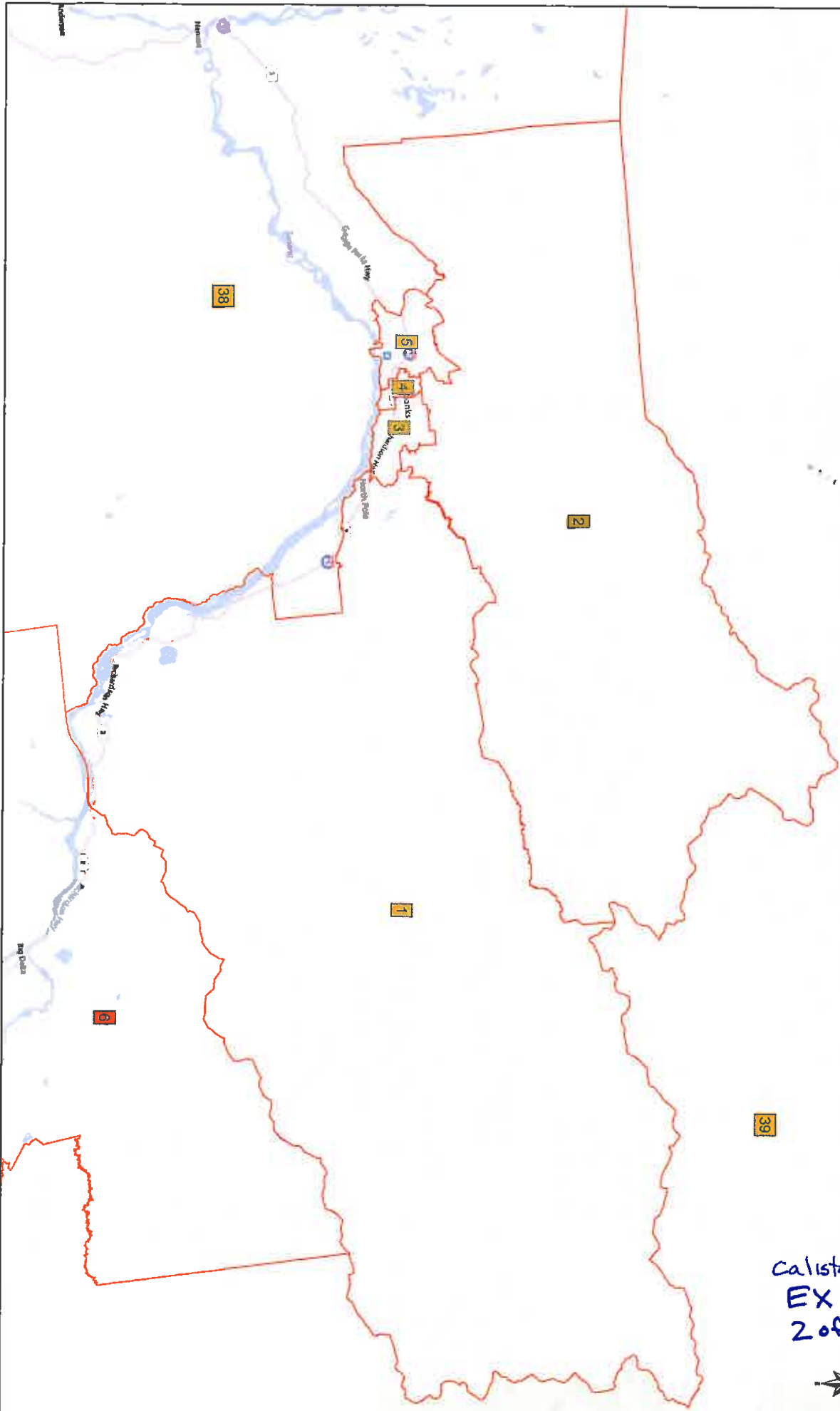


Fox

Calista/AVCP  
EX A  
1 of 5



Fairbanks Alternative 4/4 Settlement Plan Version 1



Calista/AUCP  
EX A  
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Population Totals

DISTRICT	TAPERSONS	Target	Dev.	Difference
1	18427	17,756	3.78%	671
2	18280	17,756	2.96%	524
3	18414	17,756	3.71%	658
4	18339	17,756	3.28%	583
5	18349	17,756	3.34%	593
6	16868	17,756	-5.00%	-888
7	17766	17,756	0.06%	10
8	17470	17,756	-1.61%	-286
9	17820	17,756	0.36%	64
10	17800	17,756	0.25%	44
11	17826	17,756	0.40%	70
12	18079	17,756	1.82%	323
13	17931	17,756	0.99%	175
14	17806	17,756	0.28%	50
15	17797	17,756	0.23%	41
16	17925	17,756	0.95%	169
17	17667	17,756	-0.50%	-89
18	17743	17,756	-0.07%	-13
19	17642	17,756	-0.64%	-114
20	17755	17,756	0.00%	-1
21	17702	17,756	-0.30%	-54
22	17809	17,756	0.30%	53
23	17693	17,756	-0.35%	-63
24	17924	17,756	0.95%	168
25	17678	17,756	-0.44%	-78
26	18072	17,756	1.78%	316
27	17778	17,756	0.13%	22
28	18181	17,756	2.39%	425
29	18185	17,756	2.42%	429
30	18230	17,756	2.67%	474
31	18251	17,756	2.79%	495
32	17801	17,756	0.25%	45
33	17075	17,756	-3.83%	-681
34	17875	17,756	0.67%	119
35	16951	17,756	-4.53%	-805
36	16809	17,756	5.33%	-947
37	17860	17,756	0.59%	104
	16873	17,756	-4.97%	-883
39	16827	17,756	5.23%	-929
40	16953	17,756	-4.52%	-803
Unassigned	-710231			

Calista/AUCP  
Ex A  
3 of 5

Voting Age AIAN

DISTRICT	VAPERSONS	VAAI	AIAN	VAAI	AIAN	VABLAIAN	VAAI	AIANAS	VAAI	AIANNH	VAAI	AIANOR	TVAI	AIANP1	TVAI	AIANP1P
1	13040	481	287	10	1	2	4	785	6.02%							
2	13923	567	406	5	3	0	3	984	7.07%							
3	12897	622	268	20	3	5	6	924	7.16%							
4	14226	1954	384	31	6	2	8	2385	16.77%							
5	14413	1145	387	9	8	0	6	1555	10.79%							
6	12508	717	333	8	12	4	2	1076	8.60%							
7	12781	630	378	3	6	0	7	1024	8.01%							
8	12276	650	344	16	5	4	5	1024	8.34%							
9	12588	558	387	7	11	1	9	973	7.73%							
10	12559	788	362	6	4	2	1	1163	9.26%							
11	12853	559	329	2	4	0	2	896	6.97%							
12	12668	393	232	18	2	2	6	653	5.15%							
13	12069	970	289	37	10	4	9	1319	10.93%							
14	13192	1203	375	35	19	6	11	1649	12.50%							
15	13912	1396	427	28	19	1	11	1882	13.53%							
16	14324	1563	451	37	15	2	7	2075	14.49%							
17	11801	1703	417	58	26	13	18	2235	18.94%							
18	14649	1764	379	44	14	7	8	2216	15.13%							
19	13560	951	321	13	20	5	11	1321	9.74%							
20	12969	852	294	19	17	4	6	1192	9.19%							
21	12984	701	287	19	12	3	6	1028	7.92%							
22	13533	1257	404	19	22	2	5	1709	12.63%							
23	12994	801	277	20	17	3	5	1123	8.64%							
24	12867	995	355	19	15	0	4	1388	10.79%							
25	13122	846	316	48	13	2	8	1233	9.40%							
26	12940	457	226	8	7	0	2	700	5.41%							
27	13431	363	196	5	6	0	1	571	4.25%							
28	14243	1197	413	13	22	1	5	1651	11.59%							
29	13286	808	421	8	13	3	2	1255	9.45%							
30	14169	641	348	2	2	2	5	1000	7.06%							
31	13459	1235	555	21	102	8	8	1929	14.33%							
32	14255	1665	458	18	90	6	3	2240	15.71%							
33	13101	1671	588	15	27	5	8	2314	17.66%							
34	13624	3835	640	15	53	11	12	4566	33.51%							
35	12275	1633	465	4	20	3	3	2128	17.34%							
36	10846	8343	390	8	33	8	3	8785	81.00%							

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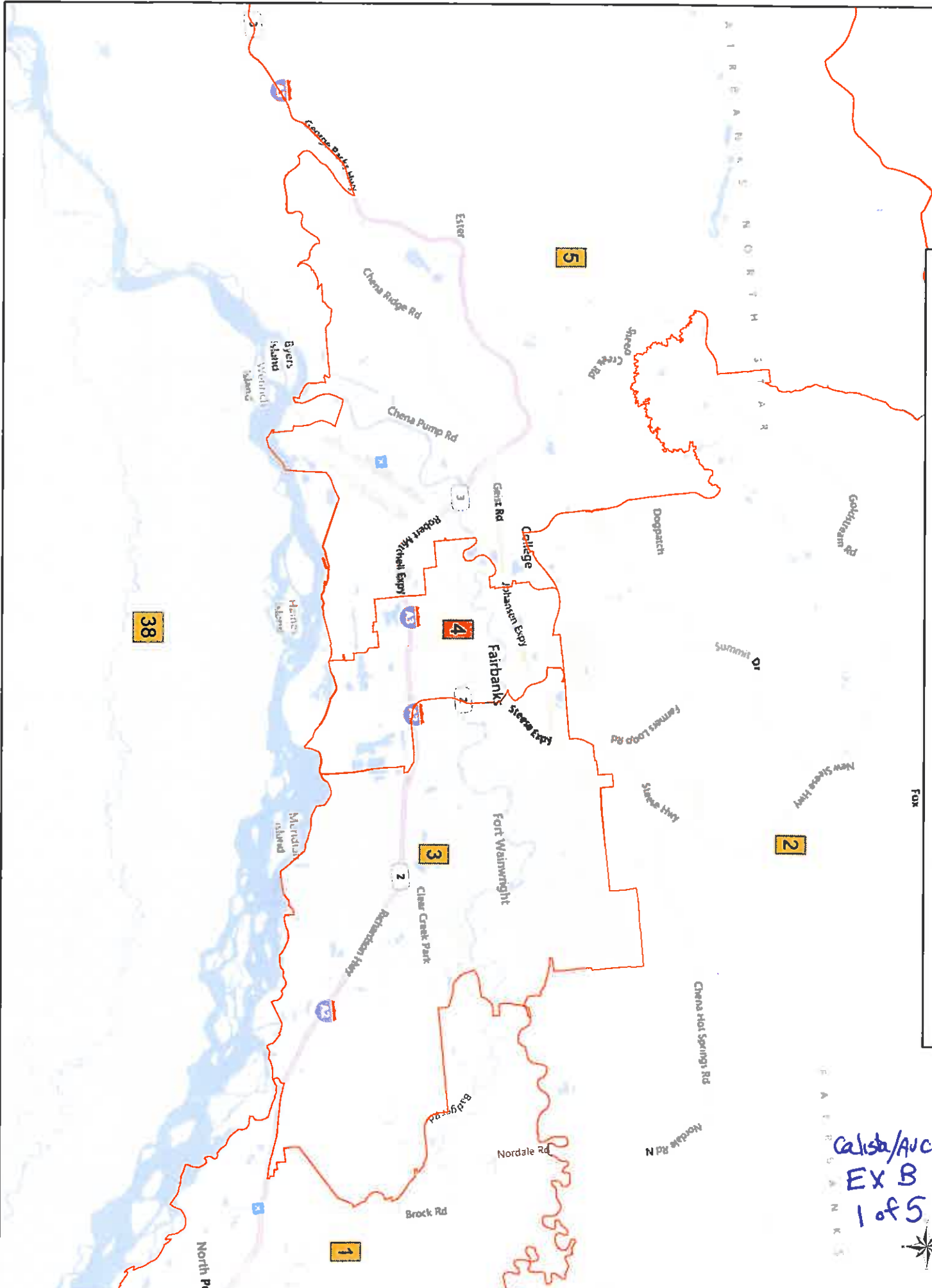
Voting Age AIAN

37	13646	5474	319	18	20	13	7	5851	42.88%
	11233	4924	256	12	4	6	2	5204	46.33%
39	11590	7156	411	6	14	4	3	7594	65.52%
40	12047	7162	334	28	20	6	5	7555	62.71%
Unassigned	-522853	-70630	-14709	-712	-717	-150	-237		

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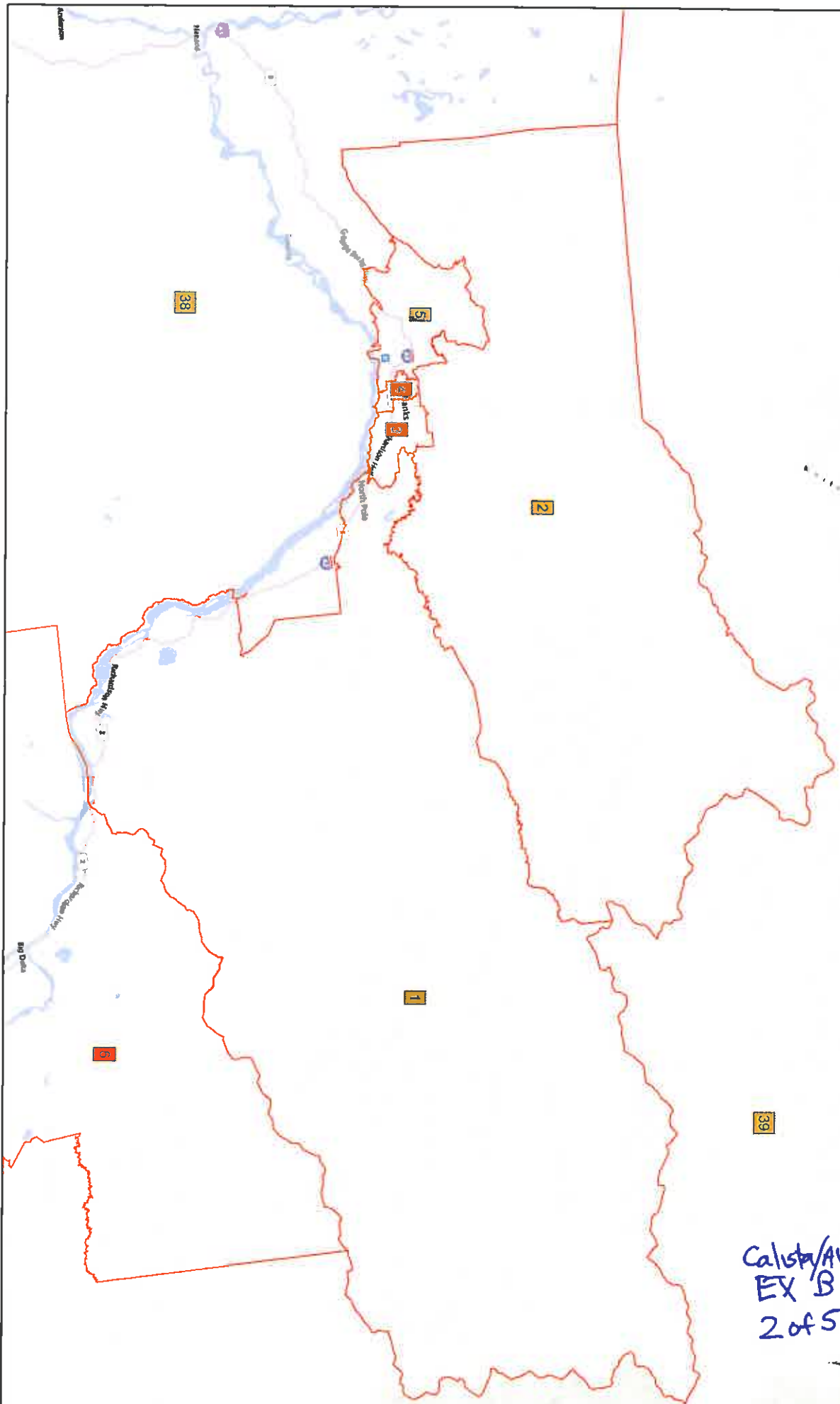
# Fairbanks Alternative 4/10 Settlement Plan version 3



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Fairbanks Alternative 4/10 Settlement Plan version 3



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Population Totals

DISTRICT	TAPERSONS	Target	Dev.	Difference
1	18381	17,756	3.52%	625
	18306	17,756	3.10%	550
3	18414	17,756	3.71%	658
4	18339	17,756	3.28%	583
5	18366	17,756	3.44%	610
6	16868	17,756	-5.00%	-888
7	17766	17,756	0.06%	10
8	17470	17,756	-1.61%	-286
9	17820	17,756	0.36%	64
10	17800	17,756	0.25%	44
11	17826	17,756	0.40%	70
12	18079	17,756	1.82%	323
13	17931	17,756	0.99%	175
14	17806	17,756	0.28%	50
15	17797	17,756	0.23%	41
16	17925	17,756	0.95%	169
17	17667	17,756	-0.50%	-89
18	17743	17,756	-0.07%	-13
19	17642	17,756	-0.64%	-114
20	17755	17,756	0.00%	-1
21	17702	17,756	-0.30%	-54
22	17809	17,756	0.30%	53
23	17693	17,756	-0.35%	-63
24	17924	17,756	0.95%	168
25	17678	17,756	-0.44%	-78
26	18072	17,756	1.78%	316
27	17778	17,756	0.13%	22
28	18181	17,756	2.39%	425
29	18185	17,756	2.42%	429
30	18230	17,756	2.67%	474
31	18251	17,756	2.79%	495
32	17801	17,756	0.25%	45
33	17075	17,756	-3.83%	-681
34	17875	17,756	0.67%	119
35	16951	17,756	-4.53%	-805
36	16809	17,756	5.33%	-947
37	17860	17,756	0.59%	104
38	16876	17,756	-4.95%	-880
39	16827	17,756	5.23%	-929
40	16953	17,756	-4.52%	-803
Unassigned	-710231			

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Volting Age AIAN

DISTRICT	VAPERSONS	VAAIANALI	VAAHAIAN	VABLAIAN	VAAIANAS	VAAIANNH	VAAIANOR	TVAAIANP1	TVAAIANP1P
1	12980	485	277	12	1	2	2	779	6.01%
2	14106	569	426	3	51	0	51	1008	7.15%
3	12897	622	268	20	3	5	6	924	7.18%
4	14226	1954	384	31	6	2	8	2385	16.77%
5	14338	1148	380	9	6	0	6	1549	10.80%
6	12508	717	333	8	12	4	2	1076	8.60%
7	12781	630	378	3	6	0	7	1024	8.01%
8	12276	650	344	16	5	4	5	1024	8.34%
9	12588	558	387	7	11	1	9	973	7.73%
10	12559	788	362	6	4	2	1	1163	9.26%
11	12853	559	329	2	4	0	2	896	6.97%
12	12668	393	232	18	2	2	6	653	5.15%
13	12069	970	289	37	10	4	9	1319	10.93%
14	13192	1203	375	35	19	6	11	1649	12.50%
15	13912	1396	427	28	19	1	11	1882	13.53%
16	14324	1563	451	37	15	2	7	2075	14.49%
17	11801	1703	417	58	26	13	18	2235	18.94%
18	14649	1764	379	44	14	7	8	2216	15.13%
19	13560	951	321	13	20	5	11	1321	9.74%
20	12969	852	294	19	17	4	6	1192	9.19%
21	12984	701	287	19	12	3	6	1028	7.92%
22	13533	1257	404	19	22	2	5	1709	12.63%
23	12994	801	277	20	17	3	5	1123	8.64%
24	12867	995	355	19	15	0	4	1388	10.79%
25	13122	846	316	48	13	2	8	1233	9.40%
26	12940	457	226	8	7	0	2	700	5.41%
27	13431	363	196	5	6	0	1	571	4.25%
28	14243	1197	413	13	22	1	5	1651	11.59%
29	13286	808	421	8	13	3	2	1255	9.45%
30	14169	641	348	2	2	2	5	1000	7.06%
31	13459	1235	555	21	102	8	8	1929	14.33%
32	14255	1665	458	18	90	6	3	2240	15.71%
33	13101	1671	588	15	27	5	8	2314	17.66%
34	13624	3835	640	15	53	11	12	4566	33.51%
35	12275	1633	465	4	20	3	3	2128	17.34%
36	10846	8343	390	8	33	8	3	8785	81.00%

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Voting Age ALIAN

37	13646	5474	319	18	20	13	7	5851	42.88%
38	11185	4915	253	12	4	6	2	5192	46.42%
39	11590	7156	411	6	14	4	3	7594	65.52%
40	12047	7162	334	28	20	6	5	7555	62.71%
Unassigned	-522853	-70630	-14709	-712	-717	-150	-237		

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