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Case No. 2:21-cv-01536-AMM

**DECLARATION OF LEE LAWSON**

I, Lee Lawson, declare as follows:

1. I am over the age of 19, and the testimony I have set out below is based upon my personal knowledge, which I could testifying competently about in court if requested to do so.

2. I was born and grew up in Montgomery, went to Troy University, and then eventually settled in Fairhope, Alabama. I have now lived in Baldwin County for eleven consecutive years and worked in different capacities at Baldwin County Economic Development Alliance for 14 years (BCEDA).

3. I currently serve as President of BCEDA. Our organization fosters business development in Baldwin County, which creates jobs and increases the quality of life for residents in our area. We focus on marketing, business recruitment, and workforce development, among other things. As a resident of Baldwin County and in my professional role, I see the unique interdependence of Baldwin and Mobile Counties.

4. After over fourteen years with BCEDA, I have given thousands of presentations about economic development. For every major project, the Mobile and Baldwin County economic development teams present together. I have never presented with anyone from Dothan or other Wiregrass Counties. The geographic proximity between Mobile and Baldwin County is consequential because the workforce radius for most proposed business development sites is limited to a 50-mile radius.

5. I-10 and I-65 connect Baldwin County with Mobile. I-10 runs across Mobile Bay, while I-65 runs across Mobile River, north of the bay. Highway 98, generally known as the Causeway, is an alternative route across the Bay leading from Spanish Fort to downtown Mobile's Bankhead tunnel. Together, these connections allow roughly 60,000 people to commute to work

from Baldwin County to Mobile or vice versa on a daily basis. The recent Bayway project, which will widen the lanes of I-10, is intended to reduce the traffic congestion experienced by these commuters.

6. In addition to the interstate, the intercoastal waterway connects Baldwin County with Mobile. Mobile's port operates as a major shipping thoroughfare, and Baldwin County has experienced major growth from its expansion. The Port of Mobile is currently engaged in a \$400 million expansion.

7. Mobile's Regional Airport also ties Baldwin County to the City of Mobile. With plans for its expansion, more Baldwin County residents will go to Mobile for air travel. Two of the recently appointed board members for the Mobile Airport Authority, Kelly McGriff and Abe Harper, are Baldwin County residents.

8. Businesses that operate in Mobile have a direct and measurable impact on Baldwin County. For the Airbus manufacturing facility in Mobile, 90% of the executive workforce and 60% of the industrial employees live in Baldwin County. Austal, whose offices are located in Mobile and Baldwin County, relies heavily on Baldwin County for its 4000-person workforce. Similarly, the Mobile Infirmary is one of the largest employers in the region and draws heavily from Baldwin County. Of Baldwin County's 100,000-person workforce, 25,000 work in Mobile.

9. Baldwin County is Mobile's primary workforce training partner. For instance, Airbus has a training facility in Fairhope. The two counties are also the biggest trading partners in the Gulf. As just one example, component parts manufactured at Collins Aerospace in Foley are used in Airbus's final assembly line plant in Mobile. Tourism is an important component of the Baldwin County economy, and Mobile benefits from tourist activity to its neighboring county.

10. Baldwin County residents consume the same media as their neighbors across the Bay. For instance, the local news affiliates of FOX, ABC, and CBS in Mobile broadcast in Baldwin County. As for print media, I would describe *Lagniappe* as the paper of record for the Mobile-Baldwin region. Residents on both sides of the Bay watch and read the same news.

11. Baldwin County residents seek medical care in Mobile, where the only local level one trauma center and Children's and Women's Hospital are located. People in Mobile and Baldwin Counties cross each other's county lines to shop. From my experience, residents of the Mobile-Baldwin region would never go to Houston County or Montgomery to meet their healthcare or shopping needs.

12. High school students in Baldwin County matriculate to colleges in Mobile, such as the University of South Alabama (USA), Springhill College, or the University of Mobile. USA has a satellite campus in Baldwin County, and USA (Mobile campus) is Baldwin County's local four-year state university.

13. Mardi Gras is unique to the Mobile-Baldwin region. Both counties have numerous Mardi Gras balls and societies, and it is common for Baldwin County and Mobile residents to collaborate during the Mardi Gras season. Like many people I know, I go to Mardi Gras balls in Mobile.

14. Maritime interests dominate the Gulf Coast's public interest concerns. While the Gulf Coast region is focused on the Bayway Bridge project, fishing regulations, and port maintenance and expansion, the Wiregrass simply doesn't have those concerns. They are worried about Fort Rucker, peanuts, cotton, and cattle. Workforce data also demonstrate that tourism, entertainment, and recreation industries are vital to Baldwin County and benefit Mobile while having very little effect on Wiregrass cities like Dothan. Putting the Wiregrass in the same district

as the Gulf Coast would force a representative to divide their political capital between two different regions with different needs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 4th, 2023.



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Lee Lawson  
President & CEO  
Baldwin County Economic Development  
Alliance