

1 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
2 THIRD JUDICIAL DISTRICT AT ANCHORAGE  
3

4 )  
5 In the Matter of the )  
6 2021 Redistricting Plan. )  
7 )

8 ) Case No. 3AN-21-08869CI

9 **AFFIDAVIT OF BETHANY MARCUM**  
10 **(Direct Testimony)**

11 STATE OF ALASKA )  
12 ) ss.  
13 THIRD JUDICIAL DISTRICT )

14 I, Bethany Marcum, being first duly sworn, depose and state as follows:

15 1. My name is Bethany Marcum, and I am the age of majority. The  
16 following testimony is based on my personal knowledge.

17 2. I have been an Anchorage resident for the past 26 years. In that time, I  
18 have lived in various neighborhoods, including Eagle River, on Fort Richardson, next  
19 to the UMed district, West Anchorage, Jewel Lake, and the east side. For the past 17  
20 years, I have resided on the Lower Hillside.

21 3. I have served in the military for over 20 years based in Anchorage, with  
22 15 years in intelligence and 5 years in religious affairs. I was in the Naval Reserve from  
23 2001 to 2008 based on Fort Richardson. My work involved research and travel about  
24 ports within Alaska, and I was involved in military exercises around the state.  
25  
26

1           4.     I have served in the Air National Guard since 2008, originally stationed  
2 at Kulis Air National Guard Base and now at Joint Base Elmendorf Richardson. I  
3 continue to participate in trainings and military exercises around the state.  
4

5           5.     I have served in a variety of volunteer positions, including as a Big Sister  
6 for a child in the Muldoon neighborhood and as a Region Representative for Safari Club  
7 International, representing Anchorage and Kenai.  
8

9           6.     Professionally, I worked for a local telecommunications company for  
10 over six years. For a portion of that time, I worked regularly in Juneau and Ketchikan  
11 as we transitioned offices from an acquired company.  
12

13           7.     I also worked for 10 years for a credit union. I trained employees from  
14 across Alaska for four of my 10 years at the credit union. The remaining six years, I  
15 performed business systems software work.  
16

17           8.     For five years, I worked for the state legislature as legislative staff,  
18 including working in Juneau during legislative sessions. During interims, I commuted  
19 to Wasilla on some days and worked in the Anchorage Legislative Office Building on  
20 other days.  
21

22           9.     Since 2017, I have served the Alaska Policy Forum. From 2017 to 2021,  
23 my title was Executive Director. In 2021 my title changed to CEO. In my roles, I travel  
24 around Alaska to meet with donors and visit Juneau to meet with state policymakers.  
25  
26

1 **Response to Anchorage Senate Challenge**

2 10. The Board adopted my proposal for how to establish senate districts  
3 within the Municipality of Anchorage. Because Anchorage has sufficient population  
4 to control 16 house districts, I proposed adopting 8 senate districts within the  
5 municipality.  
6

7 11. My understanding is that the state constitution requires that each senate  
8 district should consist of two house seats that are contiguous. My understanding is that  
9 the redistricting concepts of compactness, contiguity, and relative socio-economic  
10 integration are applied to the house districts, but do not directly apply to how the Board  
11 adopts senate pairings.  
12

13 12. In the absence of any further direction from the state constitution, I  
14 proposed senate districts based on a variety of factors that made sense based on my  
15 lived experience in Anchorage and things that I heard during public testimony that I  
16 found persuasive. Here are the reasons I proposed each district as it appears:  
17

- 18 • **Senate District E.** This district consists of House Districts 9 and 10, which  
19 include DeArmoun, Rabbit Creek, and the Bayshore and Klatt neighborhood.  
20 These are two of the waterfront districts in South Anchorage. They contain  
21 and are bounded by the major north-south traffic artery of the Seward  
22 Highway.
- 23 • **Senate District F.** This district combines House Districts 11 and 12, the  
24 neighborhoods along both the north and south of Abbott Road and is quite  
25 similar to the existing senate district from the 2013 Proclamation Plan.
- 26 • **Senate District G.** This district was made by pairing House Districts 13 and  
14. These house districts have very heavy commercial activity with many  
businesses on the north side of Dimond Boulevard, up the Old Seward

1 Highway, and into the commercial and service district of midtown  
2 Anchorage.

- 3 • **Senate District H.** This district consists of House Districts 15 and 16,  
4 unifying the Sand Lake area, which was split apart by the house district lines  
5 due to population. This also connects Jewel Lake Road, which flows directly  
6 between and within only these two House Districts.
- 7 • **Senate District I.** This district paired House Districts 17 and 18, two of  
8 Anchorage’s historic neighborhoods that share primary east-west traffic flow  
9 patterns with DeBarr Road flowing into 15th Avenue, and the Glenn  
10 Highway as it transitions into 5th Avenue.
- 11 • **Senate District J.** In this part of town, Russian Jack Springs Park is a major  
12 amenity. That park and the neighborhoods around it and using it are split  
13 between four different house districts. Combining House District 19 and  
14 District 20, which both contain the park land, allowed two of those to be  
15 paired as a Senate district. These two share a common border on DeBarr  
16 Road.
- 17 • **Senate District K.** Senate District K came together with a combination of  
18 House Districts 21 and 22. Pairing these two house districts allows  
19 commuters in Eagle River to share a senate district with a Muldoon  
20 neighborhood where they frequently stop for gas, have dinner, and where  
21 some attend church. This senate district also shares a portion of the Chugach  
22 State Park, a major public recreation amenity for these district residents.
- 23 • **Senate District L.** This district pairs House District 23 with House District  
24 24. District 23 is largely comprised of JBER. Pairing JBER with House  
25 District 24 is supported by the Glenn Highway linkage of these two areas.  
26 With my 20 years of experience serving in the military, I believe the  
connection between the military bases and the residential neighborhoods of  
Eagle River and Chugiak is particularly strong, with many active and retired  
military choosing to reside in those parts of the municipality.

13. I understand that the Anchorage plaintiffs are challenging Senate District  
K and claiming that it dilutes the votes of East Anchorage voters. I do not agree with  
this criticism. Each house district is made up of virtually identical population within

1 Anchorage, so pairing one neighborhood with another does not give one district an  
2 advantage over another.

3  
4 14. If the criticism is that the Final Plan’s senate districts give Eagle River  
5 residents the opportunity to vote in two different senate districts, Districts L and K, then  
6 the same logic establishes that residents along Muldoon Road have the opportunity to  
7 influence the outcome of three senate races in Districts J, K, and L, which encompass  
8 the area from the north to south of Muldoon Road. To the degree that Muldoon  
9 residents claim that Eagle River got something extra by comprising two senate districts,  
10 the Muldoon area now has three senators who answer to constituents along Muldoon  
11 Road.  
12

13  
14 15. Having lived all over Anchorage, I disagree and did not find persuasive  
15 testimony asserting that certain neighborhoods are so distinct that they can only be  
16 represented in the senate if paired with certain other neighborhoods. It is noteworthy,  
17 for example, that all Anchorage-area legislators, whether they represent Eagle River or  
18 South Anchorage, keep offices in the same Legislative Office Building in midtown  
19 Anchorage.  
20

21 16. Having worked in the legislature, my observation is that representatives  
22 and senators from both sides of the aisle and throughout the Anchorage Bowl may hold  
23 meetings or loosely identify as the “Anchorage Caucus” out of a recognition that  
24 Anchorage-area legislators have common interests when it comes to any number of  
25 state funding or legislative matters, including school funding, road construction and  
26

1 maintenance, debt service and reimbursement, transportation infrastructure (air, port  
2 and rail), criminal justice reform, and any number of other issues that directly affect  
3 residents throughout Alaska's largest city.  
4

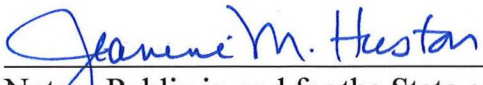
5 17. I understand the East Anchorage plaintiffs are claiming that my proposals  
6 with regard to Senate Districts K and L were a surprise to them when I made my motion  
7 on November 9. Review of the video and transcripts of November 8 will show that I  
8 specifically proposed these pairings in public session and explained my reasons for  
9 proposing them. We had a spirited discussion as a board on November 8 in public  
10 session about how to pair senate districts in East Anchorage. We then held an executive  
11 session and received specific advice regarding potential litigation and litigation  
12 strategy. After that advice and in light of all the debate the prior day, I felt that the  
13 senate districts had been discussed and debated fully and so offered a motion when we  
14 resumed public session on November 9. Contrary to the East Anchorage plaintiffs'  
15 assertions, I did not reach any agreement with the board prior to my motion and did not  
16 know how members would vote on my motion until the vote was tallied that morning.  
17  
18  
19

20 FURTHER AFFIANT SAYETH NAUGHT.

21   
22 Bethany Marcum

23 SUBSCRIBED AND SWORN to before me this 12<sup>th</sup> day of January, 2022, at  
24 Anchorage, Alaska



25   
26 Notary Public in and for the State of Alaska  
My Commission expires: 1.31.2024

1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 10<sup>th</sup> day of  
3 January, 2022, a true and correct copy of the  
4 AFFIDAVIT OF BETHANY MARCUM (DIRECT  
TESTIMONY) (7 pages) was served upon  
the following by:

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