

***Independent Citizens Redistricting Commission
September 15, 2021 Meeting Public Comment***

Date of Submission: Tuesday, September 14, 2021 10:04 AM
Method of Submission: Email To <Redistricting@Michigan.gov>
Name: Linda H. Holsapple
Subject: Split Ann Arbor from Ypsilanti

Ann Arbor needs to be split into several districts.
Let's not make this process into an partisan process that results in more gerrymandered districts than existed before.

There were high hopes for this commission. Don't make a mockery of the process. The Country is watching. The State is watching.
Do an honest job, for all our sake.
Linda Holsapple
Grosse Pointe Farms, MI

Sent from my iPhone

Date of Submission: Tuesday, September 14, 2021 10:04 AM
Method of Submission: Email To <Redistricting@Michigan.gov>
Name: kurt zinn
Subject: Clinton County, Bath Township

Dear Redistricting Commission,

I live in Clinton County, Bath Township, and work in East Lansing. I fully support the map you have drawn for my area. I also appreciate that you have split Lansing, making it more fair. My communities of interest include East Lansing, Lansing and Ingham County, so I appreciate that you have drawn Clinton County to be included with these areas.

Thank you for your time and consideration.

Sincerely,

Kurt Zinn

Date of Submission: Tuesday, September 14, 2021 10:04 AM
Method of Submission: Email To <Redistricting@Michigan.gov>
Name: Amanda Hartman Zinn
Subject: Clinton County, Bath Township

Dear Redistricting Commission:

I live in Bath Township in the southeastern corner of Clinton County. I appreciate that the commission has split Lansing and drawn my area of Clinton County and East Lansing in a more fair manner. I fully support the map that you have drawn for my area. My communities of interest include East Lansing and Lansing, and my home in Clinton County should be included with these communities of interest. We work, shop and go to school in the East Lansing and Ingham County areas.

Thank you so much for your time!

Amanda Zinn

Date of Submission: Monday, September 13, 2021 8:33 PM

Method of Submission: Email To <Redistricting@Michigan.gov>

Name: Connie M Jones

Subject: Fair and Equal Voting

Dear Commission,

Thank you for giving of your time for this important work. Voting is the foundation of our democracy and it needs to be fair and equal for all voters.

My thoughts are as follow: The districts must be competitive, so that candidates have a fair chance.

Uncompetitive districts make the primaries the defacto general election, pushing every candidate to the extremes for fear of a primary defeat. The majority of Americans do not favor extremes.

Splitting cities is necessary to create fair districts. Please map with partisan fairness data and past election results.

Thank you for this opportunity to share my thoughts.

Cover Letter for State Senate Submission

Dear Commissioners,

I was a fellow applicant to the commissioner pool, equally committed to the cause of Fair Districts in Michigan. This submission is an honest effort to draw a State Senate map subject to the same guidelines and priorities laid out for you in the Michigan Constitution:

- Equality of population and compliance with federal law
- Contiguity
- Protection of communities of interest
- Avoidance of partisan disproportionality
- No consideration for incumbents
- Respect for county and municipal boundaries
- Reasonable compactness

I gave particular attention to priority four while still giving full diligence to the items above it. As you may already be discovering, the avoidance of partisan disproportionality is a difficult task given our contemporary political environment. It will require a careful and specific focus on your part in order to fulfill this priority. This proposed plan has very low levels of partisan bias – it favors Republicans by only about two percent on two of the metrics your consultant recommended to you.

In full disclosure: I applied as a Democratic commissioner. I do not believe that I allowed my own partisan preferences to unduly persuade me, but I will let you be the judge of that.

Finally, I would like to ask that you review my proposed District 7 in particular. I believe that it brings together an important community of interest across the Wayne-Washtenaw border that the commission might otherwise miss.

Sincerely,
Corey Mason
Plymouth Township, Wayne County, Michigan

Principles and Priorities

I am a longtime political enthusiast with a graduate-level education in political science and a genuine enjoyment of electoral cartography. That is to say that I am a nerd who has thought a lot about this stuff. I'd like to start with a short summary of my approach to district-drawing and my assessment and use of the Constitutional priorities guiding the commission.

My approach to district-drawing is fundamentally iterative and collaborative. The districts I'm presenting are the result of dozens of hours of drawing and redrawing and are informed by the perspectives of a number of other plans I've reviewed. I would encourage the commission to be diligent in trying and considering a variety of approaches to the problems of districting-drawing -- in my experience, the first few maps attempted for any given purpose will benefit greatly from synthesizing a variety of ideas and from iterative refinement.

With regards to the Constitutional priorities of the commission:

Equality of population and compliance with federal law

Version 9.6 of the commission's *Mapping Process and Procedures* gives a maximum population deviation of +/- 5% for state legislative districts (that is, a 10% range from the smallest to the largest districts by population). This gives mapmakers flexibility to protect other important priorities like the ones in the Michigan Constitution.

I made full use of this flexibility, with a net deviation of 9.69%. This deviation was never used for the purposes of partisan proportionality (for example, making one party's districts systematically larger than the others.) It was instead used to comply with the municipal boundary priority.

Compliance with federal law regarding minority voting rights was at the forefront of my mind in drawing, especially in metro Detroit. Analyzing a map for Voting Rights Act ("VRA") compliance requires attorneys, but this is an honest lay effort to protect minority voting rights.

Contiguity

All districts are contiguous by land, except District 37 which must cross the Straits of Mackinac for population equality.

Protections of communities of interest and avoidance of partisan disproportionality

I am going to discuss these two elements together because they are at the heart of what Fair Districts are all about -- these two elements are what is truly new about redistricting in Michigan this cycle. If the commission does not succeed at implementing both of these priorities, then I think it will have failed to carry out the vision of Fair Districts.

Gerrymandering is bad for a variety of reasons, but the two most important are covered by these priorities. Gerrymandering frequently unites very disparate regions for partisan advantage. It also, by definition, is an attempt to lock in partisan advantage over and against the collective will of the voters.

Michigan's current map, from the 2010 redistricting cycle, exemplifies both of these tendencies. It ignores communities of interest by separating urban areas from each other, drowning them with rural voters. (See current districts 16, 19 and 31, which were intended to smother any possibility of Democratic senators from Jackson, Battle Creek, and Bay City, respectively.) It also locked in an enduring Republican majority, despite the fact the Democratic state senate candidates have frequently won more votes in the statewide aggregate.

(In fact, Republican gerrymanders have locked up the state legislature for two decades, despite the fact that Michigan has been a competitive-to-Democratic leaning state in statewide elections during that time period.)

It is important to note that these two priorities cover different areas of analysis. Communities of interest are analyzed on a district-by-district basis; partisan proportionality is analyzed on a statewide level. Giving both of these priorities the attention they deserve will require a careful interplay of consideration of both individual districts and the overall plan.

Communities of interest are real and important. The commission has done an admirable job in soliciting and reviewing public comment to help it understand how voters view their communities. However, there will be some significant hindrances in being able to analyze how well the commission fulfilled this priority. Communities of interest are inherently subjective, amorphous, and qualitative; and it will be difficult to analyze the commission's success at protecting them.

This is in no way to undermine the importance the commission should place on communities of interest. It is simply to recognize that measuring the commission's success in this area will ultimately be ambiguous.

By contrast, partisan proportionality is quantitative and easily determined. You will be able to know whether you succeeded or failed at this task. I sincerely hope that the commission is dedicated to succeeding at implementing this priority.

A side note on communities of interest: because communities of interest are inherently subjective and because I did not have access to all of the commission's testimony and public comment, I tried to think of other ways of operationalizing the concept when working on this map. One item that I considered very strongly was internal transportation links. A number of the districts presented are attempts to link communities along major roads and highways. Transportation links are fundamental to the creation of community - social and commercial opportunities exist along major arterials that enable community. Districts 7, 15, and 22 are particularly marked by this thinking.

No consideration for incumbents

No consideration for incumbents was given when drawing the maps. I am broadly unfamiliar with where state senators live, and term limits mean that the map drawn this cycle will outlive all current incumbents anyway.

Respect for County and Municipal Boundaries

From my perspective, this priority has two functions. First, it makes it easier to determine who your legislator is. "Oh, you live in Westland. Your senator is _____." Second, it eases election administration by not requiring the local governments that run elections to manage multiple ballots. (As a Plymouth Township poll-worker for the past five years, I am very sensitive to this aspect.)

The proposed map is extremely respectful of municipal boundaries. Only Detroit, Sterling Heights, and Grand Rapids were split. Detroit must be split because it is so large. Sterling Heights is surrounded by other high population cities and was the most convenient to be split for population equality. Grand Rapids was split for partisan proportionality, which is explained when describing its two districts.

I usually prioritized not splitting municipalities over not splitting counties when the two were in conflict. In most cases, the opposite choice could be made without harm to the map.

The most difficult element of this provision is the number of cities that have unannexed land within them. The vast majority of my municipal splits come either from this or from a municipality crossing county lines.

Reasonable compactness

Compactness is normally a high priority in discussing redistricting reform. Gerrymandering is often mocked by showing highly contorted districts. But the framers of the Fair Districts Amendment placed it last among the priorities for the commission. With that in mind, I strove to maintain reasonable compactness where it did not hinder higher priorities. The application I used gave the overall plan a 77% compactness score.

It is important to note that compactness will tend to advantage the Republican party in our contemporary political environment. Democratic voters tend to cluster in urban areas, which the unwary mapmaker can then unintentionally pack in highly Democratic districts. Republicans then win many more suburban and rural seats with small but durable majorities.

Finally, I would like to note a priority that isn't presented -- aesthetics. Districts that "look nice" are excellent when feasible, but aesthetic considerations should never hinder the commission's dedication to its Constitutional duties.

Methods and Terminology

My application of choice for redistricting projects is Dave's Redistricting App ("DRA").

Due to my commitment to the Constitutional priority of partisan proportionality, I drew all maps with partisan data visible (unlike the commission's multi-stage process.)

Descriptions of political competitiveness are based on DRA's "Composite 2016-2020" data, which averages the results of the following contests:

- 2016 US President
- 2018 US Senator
- 2018 Michigan Governor
- 2018 Michigan Attorney General
- 2020 US President
- 2020 US Senator

I use four descriptions of competitiveness based on this average.

- Highly competitive - neither party received more than 52.5% of the averaged vote
- Competitive with a (Republic/Democratic) lean - one party won between 52.5% and 55% of the averaged vote
- Strongly (Republican/Democratic) - one party won between 55% and 60% of the averaged vote
- Safe (Republican/Democratic) - one party won more than 60% of the averaged vote

Note that six elections consist of a highly competitive race won by Republicans (2016 president), a competitive race won by Democrats (2018 Michigan Governor) and four highly competitive races won by Democrats (the rest.) A plan that is not disproportionately partisan in accordance with the Constitution should, when analyzed with this dataset, result in control of the State Senate resting on highly competitive districts, but with a small majority of seats won by Democrats. The presented map does that, showing a 21-17 Democratic majority and with a 100% proportionality rating in DRA's analytics. Control of the Senate (again, analyzed with this data set) would rest on District 32, a highly competitive district covering the Tri-Cities.

I also analyzed this map via Campaign Legal Center's PlanScore system. PlanScore uses four tests to assess the partisan proportionality of a plan: partisan efficiency, declination, partisan bias, and mean-median difference.

PlanScore rated the plan as having very low measures of bias.

- Partisan efficiency: 1.9% in favor of the Republican Party
- Declination: .09 in favor of the Republican Party
- Partisan bias: 2.5% in favor of the Republican Party
- Mean-median difference: 0.9% in favor of the Republican Party

Note that the first and last of these metrics are ones recommended to you by Dr. Handley.

The PlanScore analysis is available here:

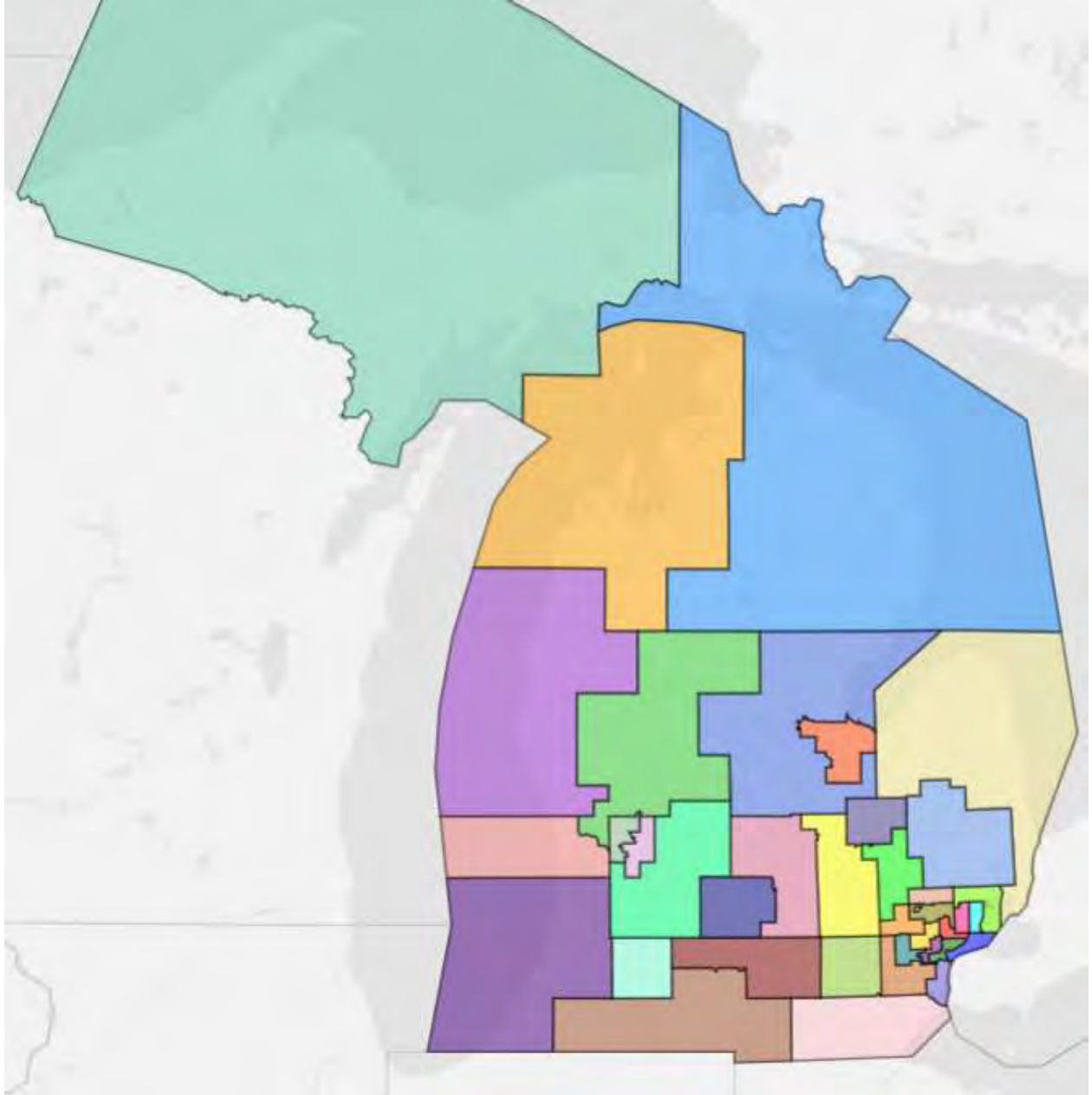
<https://planscore.campaignlegal.org/plan.html?20210908T163922.934916241Z>

Plan Overview

The full map is available at

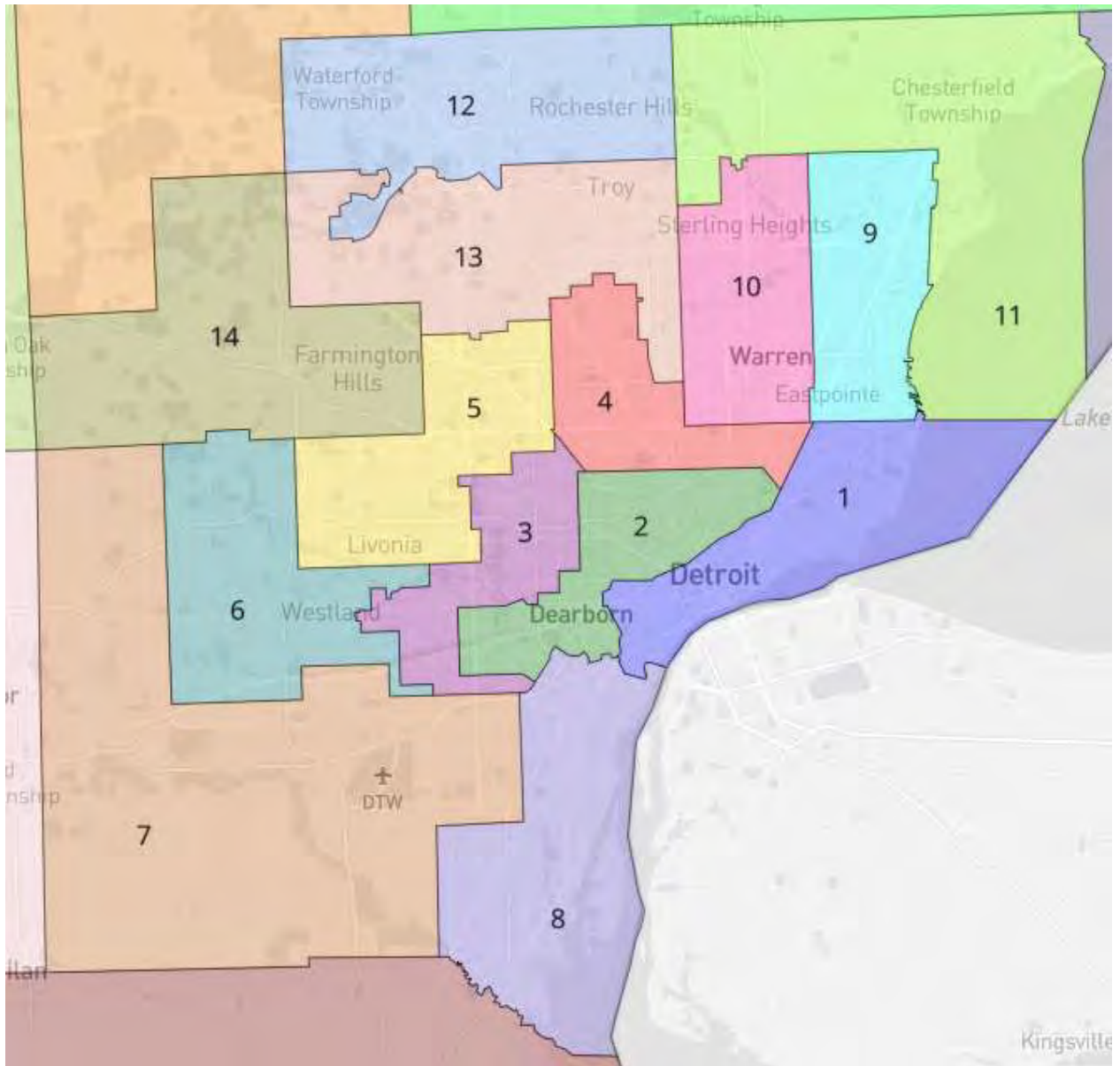
<https://davesredistricting.org/join/c7c24994-fc64-4d9b-be60-5ba8bca918b0>.

Overview map without county boundaries

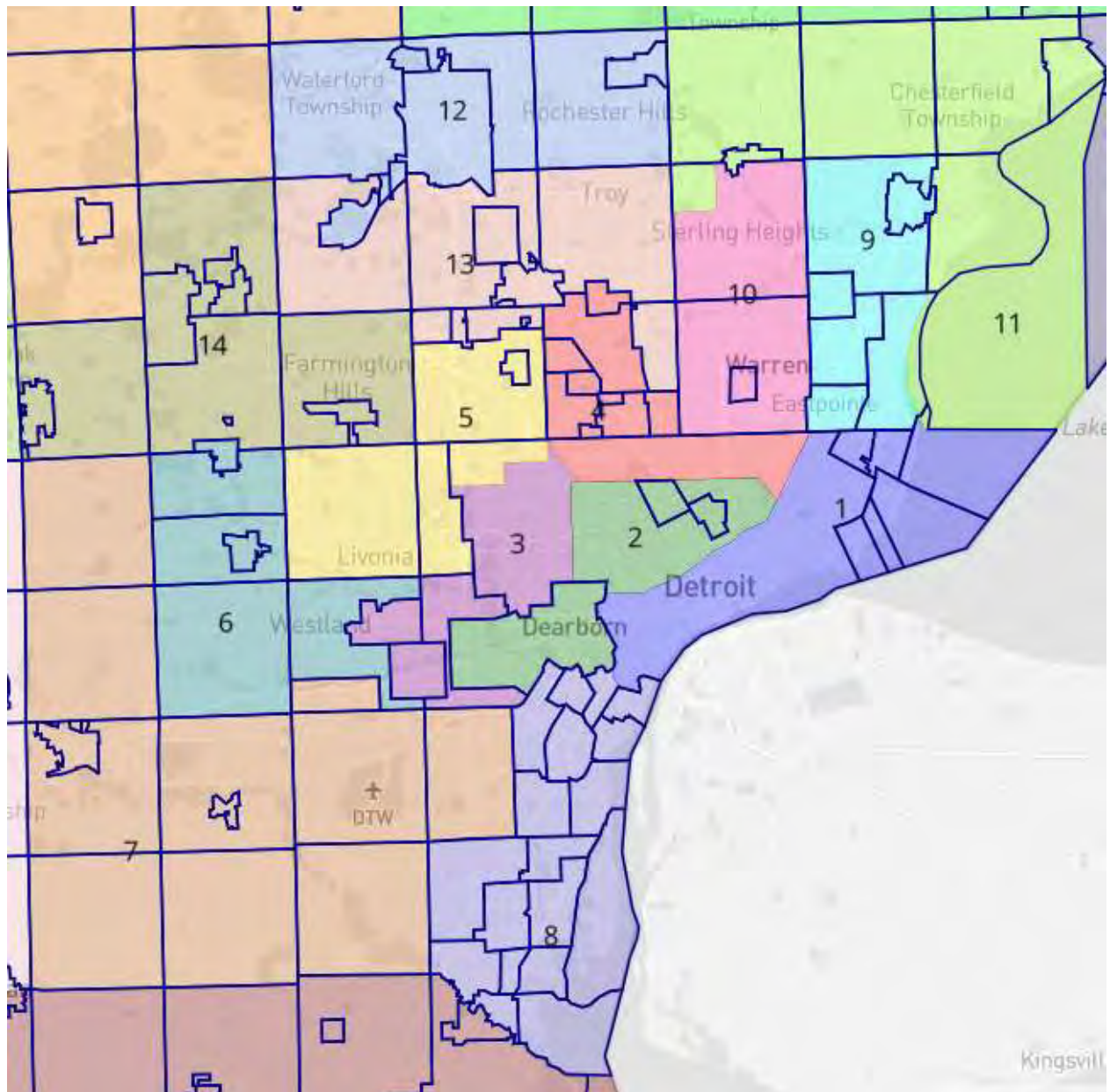


Metro Detroit

Overview map without municipal boundaries



Overview map with municipal boundaries



Districts 1 through 14 are located in the core urban and suburban portions of Metro Detroit: all of Wayne County along with southern Oakland and Macomb. One district extends into eastern Washtenaw.

Detroit-based districts: My first consideration was how to maintain five majority-minority districts that protect African-American voting rights in compliance with the VRA. With Detroit's continued population loss, I found it necessary to extend these districts across 8 Mile into Southfield and Oak Park to find sufficient African-American population.

- District 1 includes Harper Woods and the Grosse Pointes along with southern, downtown, and eastern Detroit. This district is connected along major arterials like the Ford Freeway and Jefferson Avenue.
- District 2 is Dearborn, Highland Park, Hamtramck, and central Detroit. This district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 3 joins western Detroit with Dearborn Heights, Garden City, and Inkster. Again, this district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 4 consists of northern Detroit and the many small cities between Southfield and Warren. The heart of this district is the Woodward corridor between Highland Park and Birmingham.
- District 5 is a suburban-focused district connecting Southfield, Livonia, Redford, and a small portion of far northwestern Detroit.

None of these districts split a municipality other than Detroit. Divisions in Detroit are generally along major roads. For example, the major boundaries between District 1 and 2 is Gratiot, between District 2 and 3 is Schaeffer Highway, and between District 2 and 4 is McNichols. Using major roads as boundaries within cities improves the public's capacity to understand the districts' layout.

They are all safe Democratic districts. As majority-minority districts designed to protect African-American voting rights, they are all highly likely to elect African American Democrats.

Wayne-based districts: The remaining Wayne County districts look to protect communities of interest while keeping in mind statewide partisan proportionality.

- District 6 takes in Northville, Plymouth, Canton, and Westland. It is connected along major arterials like Ford Road and I-275.
- District 7 is located in southwestern Wayne County and eastern Washtenaw. It is centered around the I-94 corridor and has a significant African American population.
- District 8 is a Downriver district. Public comment was overwhelmingly in favor of recognizing this community of interest where possible. It is connected along I-75 and Fort St (M-85).

I would particularly like to highlight District 7. Because it straddles the Wayne/Washtenaw border, I think the commission might otherwise miss this potential district. I believe that the I-94 corridor is a very real community of interest in terms of commuter and commercial flows. It brings together an aviation industrial interest by connecting Detroit Metro and Willow Run airports. Further, its population is about one-quarter African American, which makes it likely that African Americans would have a plurality of the Democratic primary vote in this district. This district would create a strong opportunity for African American representation outside of the city of Detroit.

None of these districts split a municipality other than Detroit, which is split along a major geographical feature.

District 6 would be strongly Democratic, District 7 safe Democratic, and District 8 competitive with a Democratic lean.

Macomb-based Districts: I drew three districts in the southern half of Macomb.

- District 9 consists of St. Clair Shores, Eastpointe, Roseville, Fraser, Clinton Twp, and Mount Clemens. This district is built around the Gratiot corridor as a community of interest.
- District 10 consists of Warren, Center Line, and most of Sterling Heights. This district is built around Mound and Van Dyke as arterial connectors.
- District 11 pulls together the outer band of rapidly growing suburbs: Harrison, Chesterfield Twp, New Baltimore, Macomb Twp, Shelby Twp, Utica, and a part of Sterling Heights for population equality.

These districts contain no county splits and one municipal split in Sterling Heights. The choice of which portion of Sterling Heights is attached to District 11 could easily be changed if the commission's community of interest testimony persuades it otherwise. My selected portion is north of 18 Mile and west of Mound Rd. I selected it to improve statewide proportionality.

I made the decision to run Districts 9 and 10 vertically instead of horizontally to 1) better follow the transportation arterials running north out of Detroit and 2) improve statewide proportionality.

District 9 is competitive with a Democratic lean, District 10 highly competitive, and District 11 strongly Republican.

Oakland-based Districts: I drew an additional three districts in southern and eastern Oakland.

- District 12 runs along M-59 in central Oakland, connecting Rochester/Rochester Hills, Auburn Hills, Pontiac, and Waterford Twp (along with some smaller adjacent communities.)
- District 13 combines the next line of cities to the south: Madison Heights, Troy, Bloomfield, Bloomfield Hills, Birmingham and West Bloomfield (along with the smaller communities just north of Southfield.) On its east side, it connected along the Chrysler Freeway. In the center, it includes a stretch of the Woodward corridor. I would guess that this district would have the highest average household income in the state.
- District 14 pulls together the southwestern portion of the county - Farmington/Farmington Hills, Novi, South Lyon/Lyon Twp, and Wixom/Walled Lake/Commerce Twp. This district is built around I-96/696 and the Grand River corridor.

These districts contain no county or municipal splits.

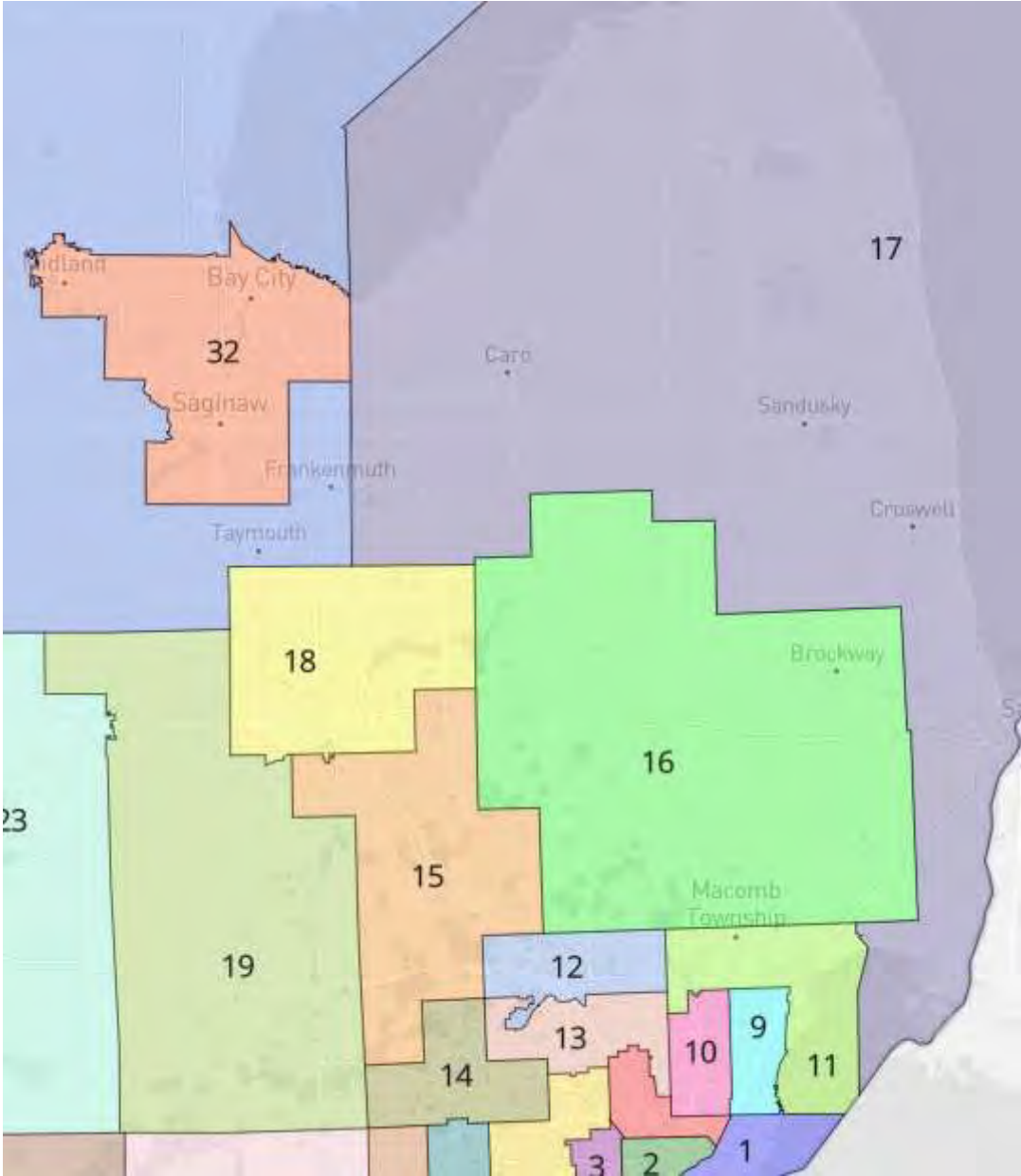
All three districts would be competitive with a Democratic lean.

Some additional notes on county and/or municipal splits in the Detroit region before moving on:

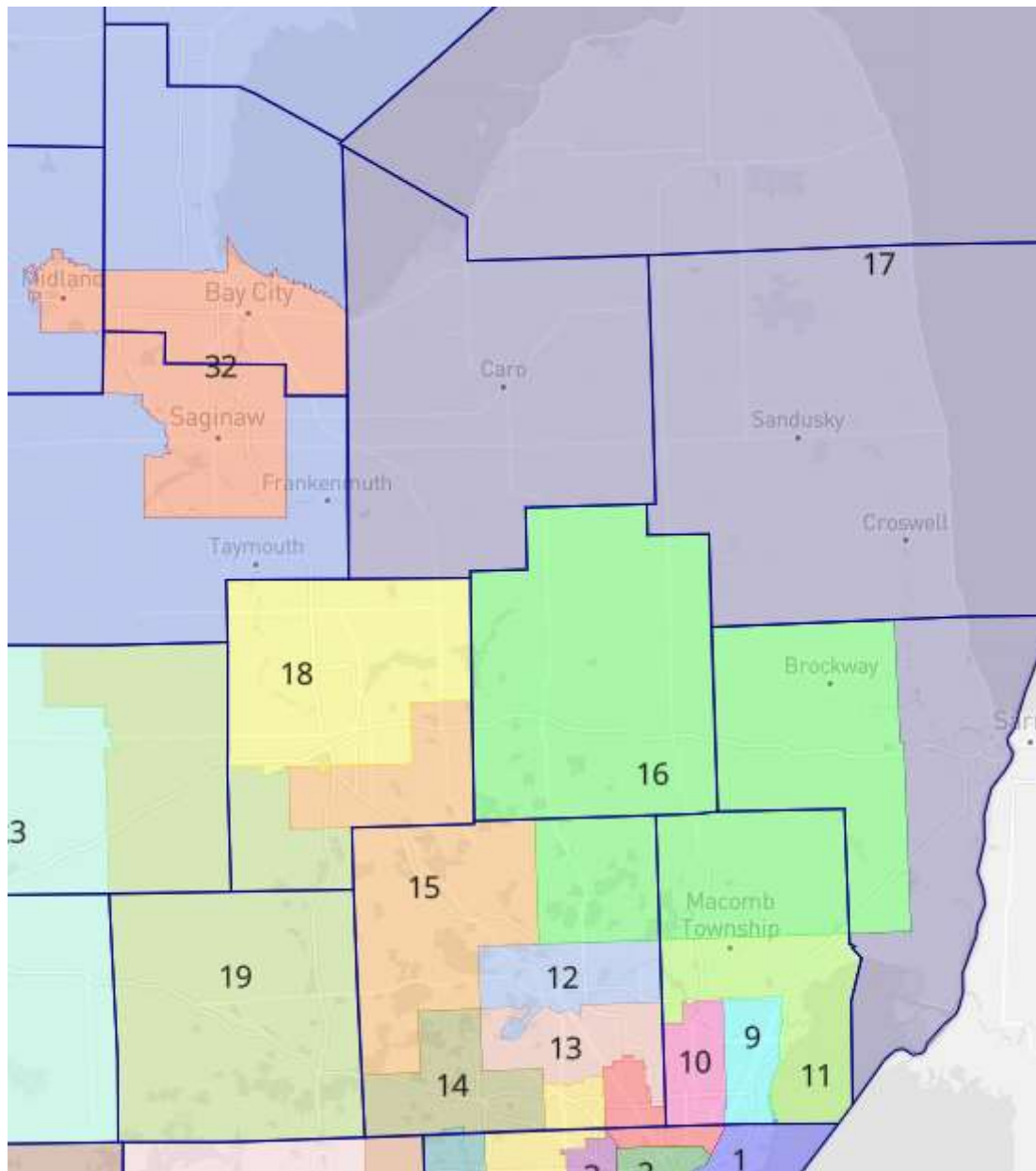
- District 1 includes all of Grosse Pointe Shores, including the Oakland County portion. That portion has a tiny population and could easily be moved to District 9 to split the municipality instead of the county, if desired.
- District 6 includes all of Northville, including the Oakland County portion. Although that portion contains several thousand people, it could be moved to District 14 to split the municipality instead of the county while both districts stay within legal population equality limits, if desired.
- District 8 includes a small portion of southern Detroit, specifically the areas south of the Rouge River. That portion is home to about 6,500 people. District 8 would still be within legal population equality limits without it, but boundaries inside Detroit would need to change as District 1 would go over population limits if it absorbed the area. Keeping it in District 8 preserves a small community of interest between African American residents of Ecorse, River Rouge, and that small slice of southern Detroit.

East Michigan

Overview map without county boundaries



Overview map with county boundaries



District 15 through District 18 are located in East Michigan - Genesee, northern and western Oakland, northern Macomb, and the Thumb.

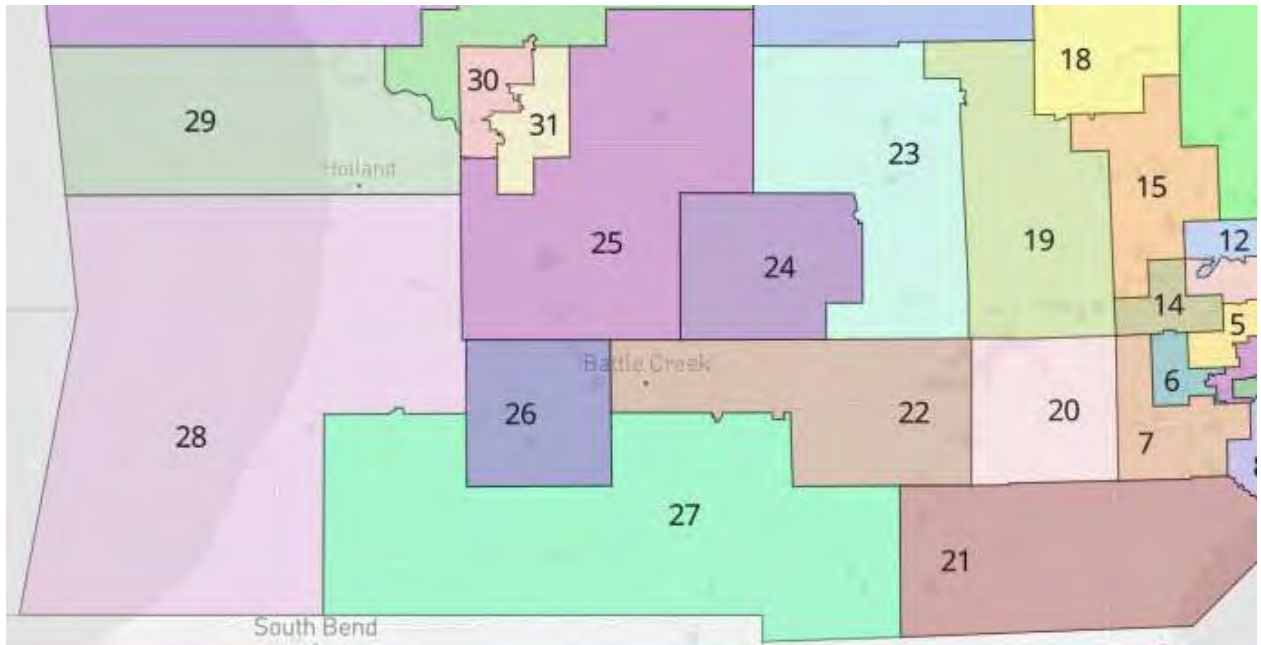
- District 15 is built around the I-75 corridor between Pontiac and Flint.
- District 16 pulls together exurban and rural areas anchored by Lapeer, combined with northeastern Oakland, northern Macomb, and western St. Clair
- District 17 is a Thumb district with Tuscola, Huron, and Sanilac along with the eastern, coastal portions of St. Clair.
- District 18 is a compact northern Genesee district anchored in Flint.

There are no municipal splits among these districts.

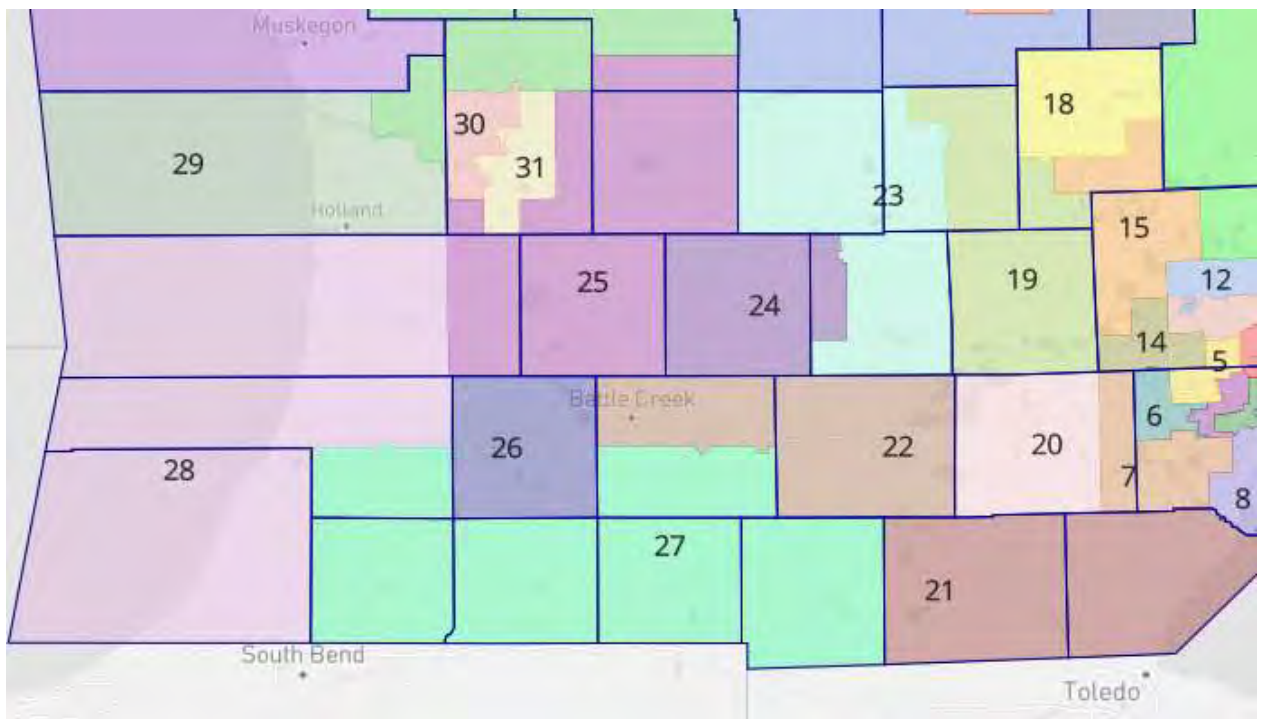
This is a heavily Republican section of the state. District 18 would be safe Democratic, and at about 30% African American, likely to elect an African American Democrat. District 15 which is strongly Republican and the other two safe Republican.

Southern, Central and Western Michigan

Overview map without county boundaries



Overview map with county boundaries



Central/South Michigan - Districts 19 through 24 are located in the greater Lansing and Ann Arbor areas. They cover all of Monroe, Lenawee, Livingston, Shiawassee, Clinton, Eaton, Ingham, and Jackson Counties; most of Washtenaw and Calhoun Counties; and part of Genesee County.

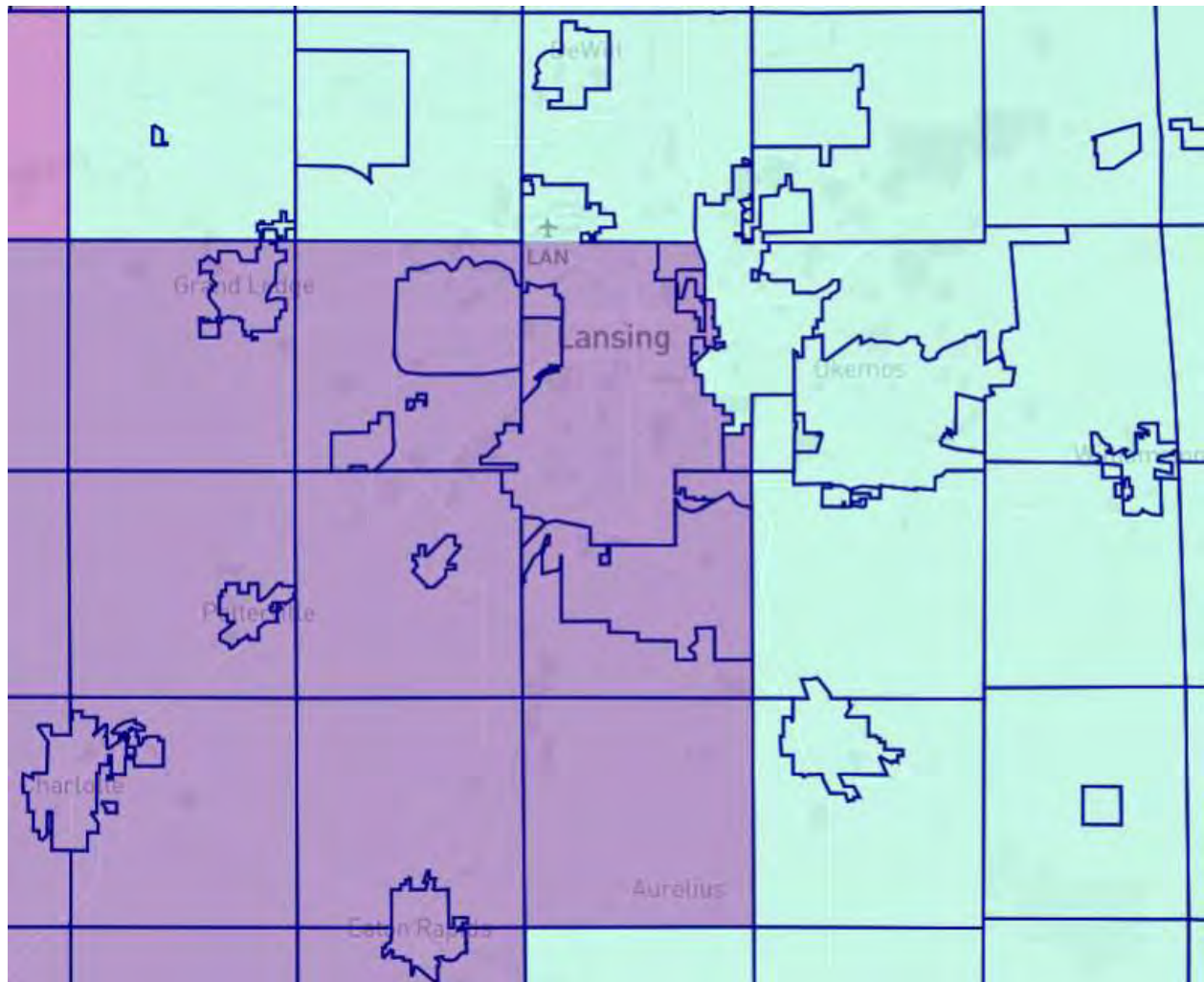
- District 19 is a suburban/exurban seat in the middle of Detroit, Flint, and Lansing. It combines all of Livingston County with southern Genesee and eastern Shiawassee.
- District 20 is a compact Washtenaw seat, anchored by Ann Arbor and containing its western bedroom communities.
- District 21 links Lenawee and Monroe, the two southeasternmost counties of the state.
- District 22 combines Jackson with northern Calhoun as a I-94/Michigan Ave corridor community of interest.
- District 23 is one of two Lansing area districts. This one combines Clinton, western Shiawassee, and most of Ingham.
- District 24 is the other Lansing seat. It combines Lansing proper with Eaton.

These six districts contain four county splits in Ingham, Shiawassee, Genesee, and Calhoun. These splits are due to population equalization -- these are all relatively large counties that would be difficult to recombine into fewer splits, especially while keeping the commission's other priorities in mind. They contain no municipal splits that aren't explained by enclaves or county boundaries.

Districts 20 and 21 are fairly self-explanatory, I think. District 22 pulls together the small industrial cities and towns along I-94/Michigan Ave and separates those small urban areas from the rural areas to their south. The Lansing area is roughly large enough for two districts. Splitting it into two districts that both contain urban cores is necessary for statewide proportionality to avoid advantaging the Republican party. Livingston is large enough to anchor its own district in District 19, and taking in southern Genesee follows a community of interest along US-23. Shiawassee County is split between Districts 19 and 23 largely for population equality as opposed to any other interest.

These six districts are split in party preference. Districts 19 and 21 are strongly Republican, while District 22 is competitive with a Republican lean. District 20 is safe Democratic, District 24 strongly Democratic, and District 23 competitive with a Democratic lean.

Close-up of the Lansing area with municipal boundaries



West/South Michigan - Districts 25 through 31 are located in the greater Grand Rapids and Kalamazoo areas. They cover all of Hillsdale, Branch, St. Joseph, Cass, Berrien, Van Buren, Kalamazoo, Allegan, Barry, and Ionia Counties; most of Ottawa and Kent Counties; and part of Calhoun and Montcalm Counties.

- District 25 is a district for Grand Rapids' eastern and southern suburbs and exurbs. It contains all of Barry and Ionia and parts of Kent, Allegan, and Montcalm.
- District 26 is a compact Kalamazoo seat, containing all of Kalamazoo County.
- District 27 pulls together the southern rural counties of Hillsdale, Cass, St. Joseph, and Branch with the southern halves of Calhoun and Van Buren. US-12 is a major arterial for this district.
- District 28 lies along the Lake Michigan coast south of Holland, containing Berrien, northern Van Buren, and most of Allegan.

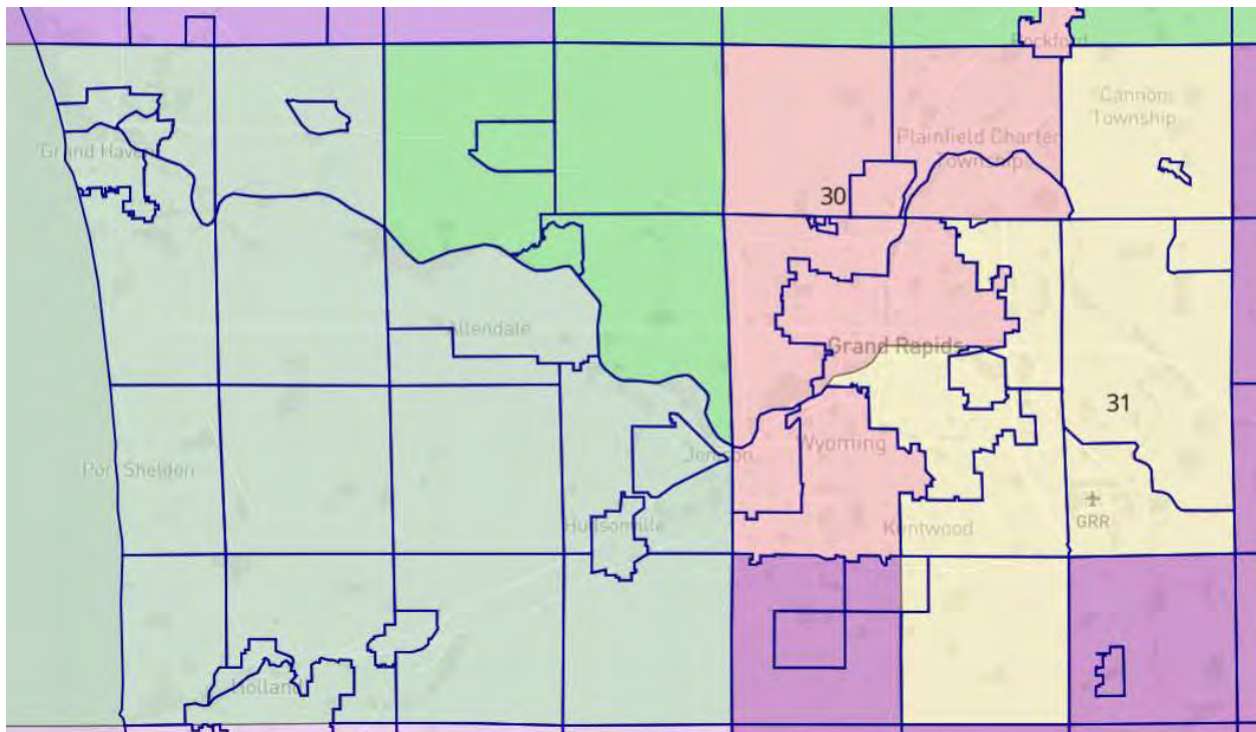
- District 29 is a compact Ottawa seat. Ottawa is too large for a single district, so far northeastern Ottawa is placed in District 34
- District 30 is one of two Grand Rapids-based seats, containing the western and northern portions of the “Six Cities” and extending into surrounding townships.
- District 31 is the other Grand Rapids-based seat, containing the eastern and southern portions of the “Six Cities” and extending into surrounding townships.

These seven districts contain six counties that are split between them, which are required for population equality. The city of Grand Rapids is the only municipality split, which is necessary for statewide proportionality. The split follows Fulton St and the Grand River. Splitting Grand Rapids itself allows it to anchor two districts with its suburban neighbors. Failure to split Grand Rapids packs urban voters and unfairly advantages the Republican party.

District 26 pretty much draws itself as a compact Kalamazoo seat. District 27 takes in the four rural counties to the south, along with the southern half of Calhoun that didn't fit into District 22 and enough of Van Buren for population equality. The shoreline District 28 takes in Berrien, the remainder of Van Buren, and most of Allegan for population equality. District 29 is most of Ottawa County - portions north and east of the Grand are excluded for population equality. Districts 30 and 31 take in the core portions of metro Grand Rapids in Kent County. District 25 is then Barry and Ionia combined with the remainder of Allegan, the remainder of southern and eastern Kent, and the southern tier of townships from Montcalm for population equality.

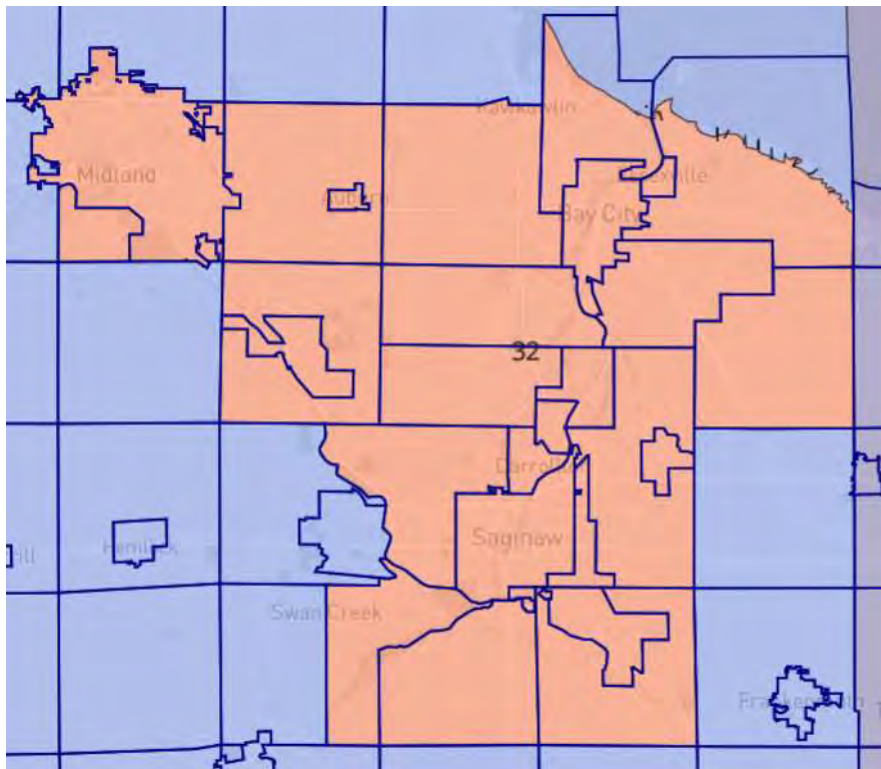
This region of the state favors Republicans, which is shown in the districts' partisan preferences. Districts 25, 27 and 29 are safe Republican; while District 28 is strongly Republican. Districts 26 and 31 are strongly Democratic. District 30 would be highly competitive.

Close-up of Kent and Ottawa with municipal boundaries



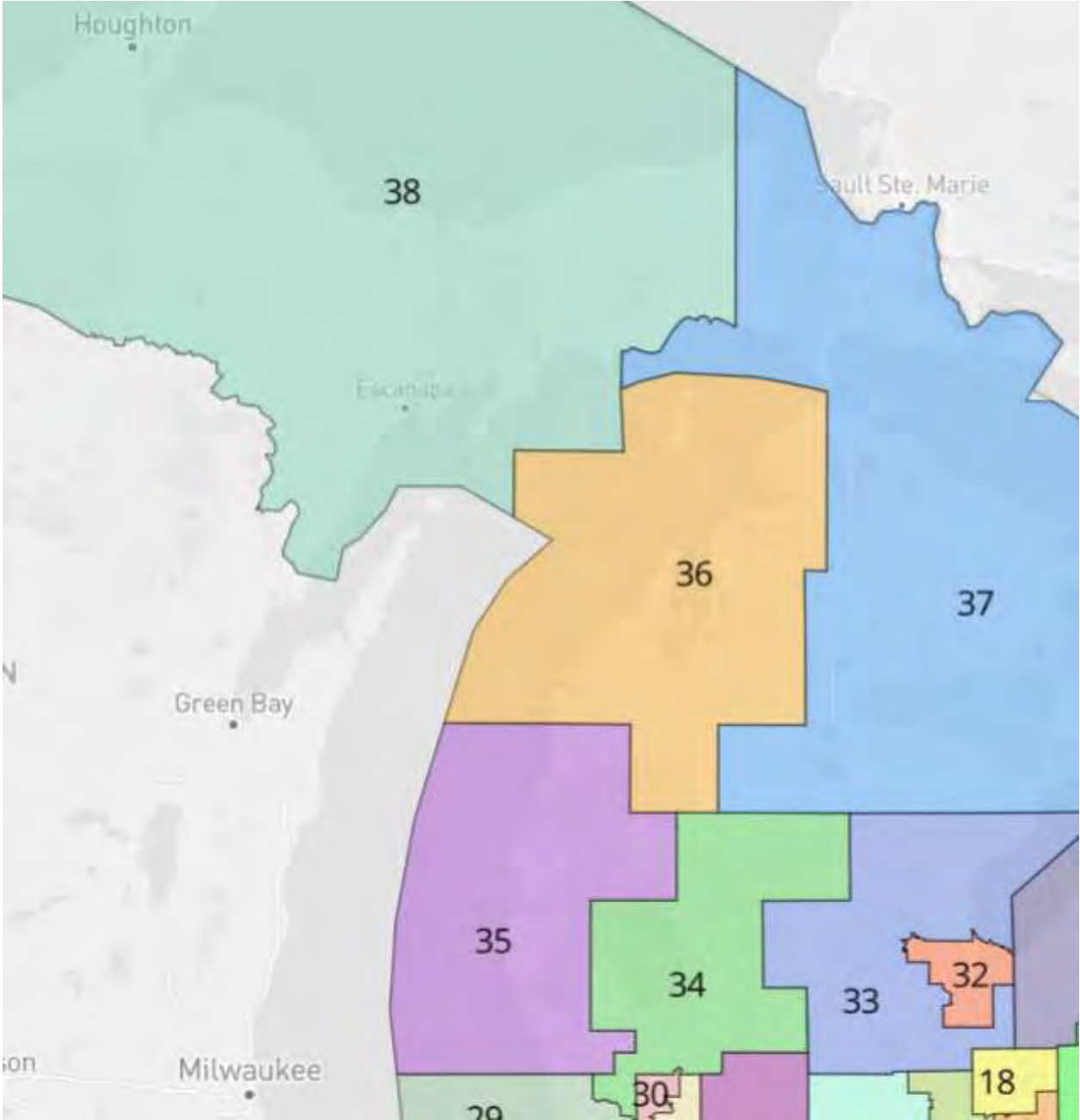
Note that the Cutlerville area south of Wyoming/Kentwood that appears to be split is a Census-designated place, not a true municipality

Close-up of the Tri-Cities Area with municipal boundaries

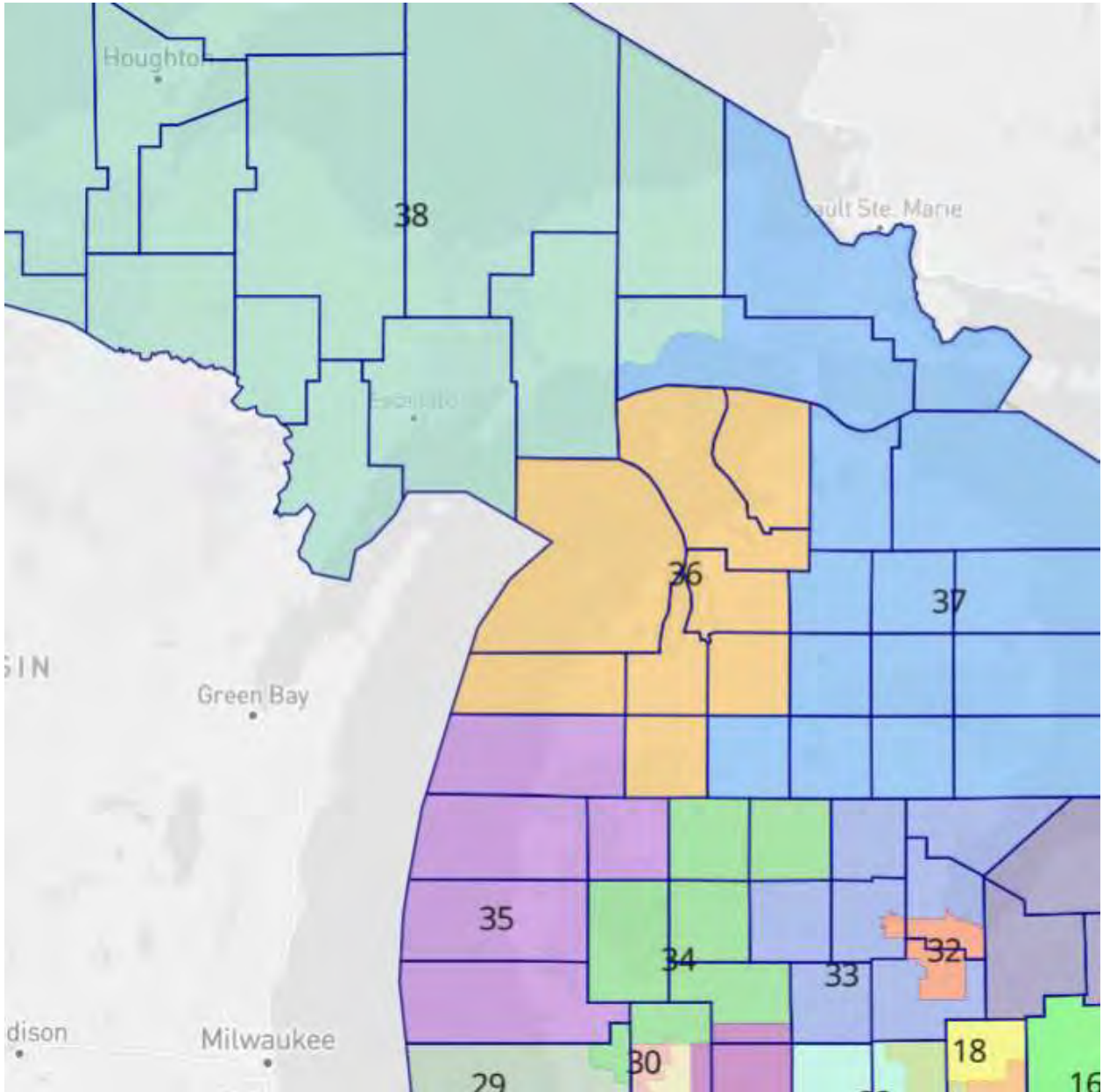


Northern Michigan

Overview map without county boundaries



Overview map with county boundaries



The remaining districts (32 through 38) are in northern Michigan - defined roughly as Muskegon, Newaygo, Montcalm, Gratiot, and Saginaw Counties; along with all counties north of them.

- District 32 is a compact Tri-Cities district, both in response to public comment to protect that community of interest and for statewide partisan proportionality.
- District 33 takes in the remainder of Saginaw, Bay, and Midland Counties, along with Arenac, Gladwin, Isabella, and Gratiot Counties. This creates a rural and small town community of interest district in east central Michigan to complement District 32's urban and suburban district.
- District 34 takes in the remainder of Kent, Ottawa, and Montcalm Counties and combines them with the interior counties to their north: Newaygo, Mecosta, Oceola, and Clare. This follows the M37 and US131 arterials going north from Grand Rapids.
- District 35 is a shoreline community of interest district with Muskegon, Oceana, Mason, and Manistee Counties. It also includes Lake County for population equality.
- District 36 is a community of interest district for Greater Traverse City. It includes Emmet, Charlevoix, Antrim, Kalkaska, Wexford, Grand Traverse, Leelanau, and Benzie.
- District 37 is 37's counterpart on the Lake Huron side, containing Missaukee, Roscommon, Ogemaw, Iosco, Alcona, Oscoda, Crawford, Otsego, Montmorency, Alpena, Presque Isle and Cheboygan Counties. For population equality, it crosses the Straights to take most of Mackinac and all of Chippewa.
- District 38 is the remainder of Mackinac and the remaining Upper Peninsula counties: Luce, Schoolcraft, Alger, Delta, Menominee, Dickinson, Marquette, Iron, Baraga, Houghton, Keweenaw, Ontonagon, and Gogebic.

These seven districts contain seven counties that are split, mostly in Districts 32 through 34. Districts 35 and 36 require no county splits, while District 38 requires a split of Mackinac or Chippewa for population equality.

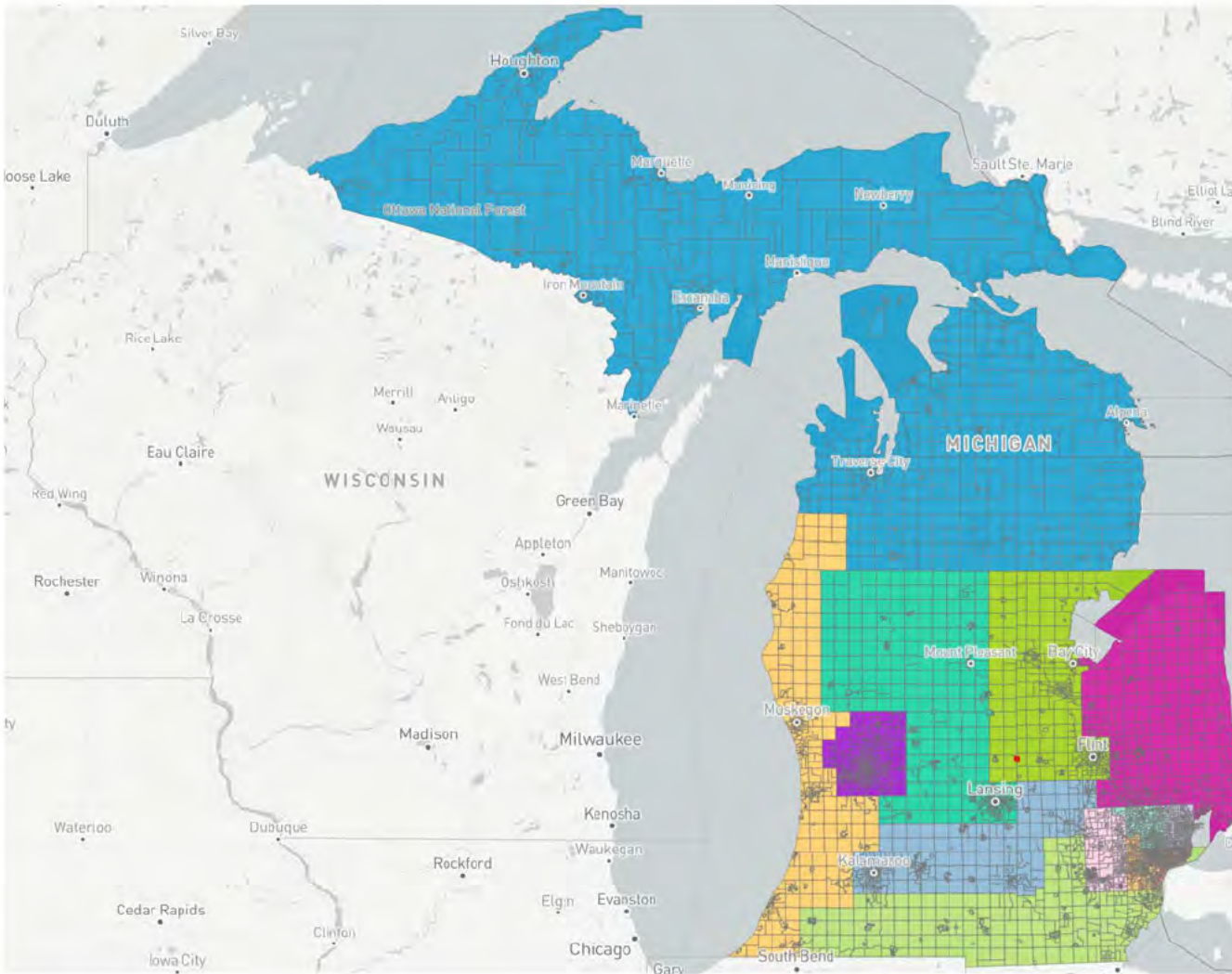
District 34 splits come from taking in the portion of counties leftover in districts to its south and won't be rehashed.

Districts 32 and 33 split Saginaw, Bay, and Midland Counties between them. This is necessary both to protect the Tri-Cities community of interest and for statewide proportionality. District 32, as a compact urban seat across three counties, is specifically the kind of district that the Fair Districts amendment supports by deprioritizing boundary splits in favor of communities of interest and proportionality.

This area is mostly split between competitive districts and those that favor Republicans. Districts 32 and 35 are highly competitive, while District 38 is competitive with a Republican lean. Districts 33 and 36 are strongly Republican, while the remaining two are safe Republican.

Conclusion

The presented plan demonstrates that it is possible to adhere to the Constitutional priorities of equality of population and fidelity to federal law, contiguity, and preserving communities of interest, while also maximizing partisan proportionality. I hope that it will serve as a useful model for the commissioners as they seek to implement their Constitutional mandate. I thank the commissioners for their consideration.



About redistricting

About the data

Save plan

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New plan

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Export plan as SHP

Export plan as GeoJSON

Export assignment as CSV

About import/export options

- SCHOOL DISTRICTS
- Municipalities

Demographics

▶ Population by Race

▶ Coalition Builder

Statewide Elections

ELECTION:

2018 Governor Election

CANNER, CANNER & ROWADY, P.C.

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MICHAEL L. ROWADY

Michigan Independent Citizens
Redistricting Commission
PO Box 30318
Lansing, MI 48909

RE: LGBTQ Communities of Interest

Dear Commissioners:

I am a Ferndale, Michigan resident, attorney and Chairman Emeritus of Equality Michigan, the largest political advocacy organization for the LGBTQ community in Michigan. I am writing because I am concerned about our future representation, especially in the Michigan Legislature as you consider drawing our legislative lines. I am aware you will soon be starting map out our new State Senate districts for Southern Oakland County.

I believe our Senate district in southern Oakland County should be comprised of the cities of Southfield, Huntington Woods, Ferndale, Pleasant Ridge, and Hazel Park. These cities are central to Michigan's LGBTQ community, and, notably, each has openly-LGBTQ local elected officials on the City Council-level representing our interests as a minority population, in addition to the organizations and advocates that call southern Oakland County home. This demonstrates that these cities are bonded as an LGBTQ communities of interest. Much of the changes in the culture of Michigan regarding more acceptance of the LGBTQ community are because of this representation, from Southfield to Hazel Park and cities in between. I along with our community leaders have worked with key officials in southern Oakland County, including in the State Senate, where we have a voice for the first time in Michigan history an LGBTQ voices.

We have made much progress at the state level through our community's representation in our State Senate district, from the first-ever adopted LGBTQ Pride Month Resolution, to bipartisan support for amending the Elliott-Larsen Civil Rights Act to include LGBTQ discrimination protections. Accordingly, I would strongly encourage the Commission to consider a state senate district that includes Southfield, Ferndale, Pleasant Ridge, Hazel Park and Huntington Woods.

Thank you in advance for your thorough consideration of our communities' interests.

Very sincerely yours,



Michael L. Rowady, Esq.

Cover Letter for State Senate Submission

Dear Commissioners,

I was a fellow applicant to the commissioner pool, equally committed to the cause of Fair Districts in Michigan. This submission is an honest effort to draw a State Senate map subject to the same guidelines and priorities laid out for you in the Michigan Constitution:

- Equality of population and compliance with federal law
- Contiguity
- Protection of communities of interest
- Avoidance of partisan disproportionality
- No consideration for incumbents
- Respect for county and municipal boundaries
- Reasonable compactness

I gave particular attention to priority four while still giving full diligence to the items above it. As you may already be discovering, the avoidance of partisan disproportionality is a difficult task given our contemporary political environment. It will require a careful and specific focus on your part in order to fulfill this priority. This proposed plan has very low levels of partisan bias – it favors Republicans by only about two percent on two of the metrics your consultant recommended to you.

In full disclosure: I applied as a Democratic commissioner. I do not believe that I allowed my own partisan preferences to unduly persuade me, but I will let you be the judge of that.

Finally, I would like to ask that you review my proposed District 7 in particular. I believe that it brings together an important community of interest across the Wayne-Washtenaw border that the commission might otherwise miss.

Sincerely,
Corey Mason
Plymouth Township, Wayne County, Michigan

Principles and Priorities

I am a longtime political enthusiast with a graduate-level education in political science and a genuine enjoyment of electoral cartography. That is to say that I am a nerd who has thought a lot about this stuff. I'd like to start with a short summary of my approach to district-drawing and my assessment and use of the Constitutional priorities guiding the commission.

My approach to district-drawing is fundamentally iterative and collaborative. The districts I'm presenting are the result of dozens of hours of drawing and redrawing and are informed by the perspectives of a number of other plans I've reviewed. I would encourage the commission to be diligent in trying and considering a variety of approaches to the problems of districting-drawing -- in my experience, the first few maps attempted for any given purpose will benefit greatly from synthesizing a variety of ideas and from iterative refinement.

With regards to the Constitutional priorities of the commission:

Equality of population and compliance with federal law

Version 9.6 of the commission's *Mapping Process and Procedures* gives a maximum population deviation of +/- 5% for state legislative districts (that is, a 10% range from the smallest to the largest districts by population). This gives mapmakers flexibility to protect other important priorities like the ones in the Michigan Constitution.

I made full use of this flexibility, with a net deviation of 9.69%. This deviation was never used for the purposes of partisan proportionality (for example, making one party's districts systematically larger than the others.) It was instead used to comply with the municipal boundary priority.

Compliance with federal law regarding minority voting rights was at the forefront of my mind in drawing, especially in metro Detroit. Analyzing a map for Voting Rights Act ("VRA") compliance requires attorneys, but this is an honest lay effort to protect minority voting rights.

Contiguity

All districts are contiguous by land, except District 37 which must cross the Straits of Mackinac for population equality.

Protections of communities of interest and avoidance of partisan disproportionality

I am going to discuss these two elements together because they are at the heart of what Fair Districts are all about -- these two elements are what is truly new about redistricting in Michigan this cycle. If the commission does not succeed at implementing both of these priorities, then I think it will have failed to carry out the vision of Fair Districts.

Gerrymandering is bad for a variety of reasons, but the two most important are covered by these priorities. Gerrymandering frequently unites very disparate regions for partisan advantage. It also, by definition, is an attempt to lock in partisan advantage over and against the collective will of the voters.

Michigan's current map, from the 2010 redistricting cycle, exemplifies both of these tendencies. It ignores communities of interest by separating urban areas from each other, drowning them with rural voters. (See current districts 16, 19 and 31, which were intended to smother any possibility of Democratic senators from Jackson, Battle Creek, and Bay City, respectively.) It also locked in an enduring Republican majority, despite the fact the Democratic state senate candidates have frequently won more votes in the statewide aggregate.

(In fact, Republican gerrymanders have locked up the state legislature for two decades, despite the fact that Michigan has been a competitive-to-Democratic leaning state in statewide elections during that time period.)

It is important to note that these two priorities cover different areas of analysis. Communities of interest are analyzed on a district-by-district basis; partisan proportionality is analyzed on a statewide level. Giving both of these priorities the attention they deserve will require a careful interplay of consideration of both individual districts and the overall plan.

Communities of interest are real and important. The commission has done an admirable job in soliciting and reviewing public comment to help it understand how voters view their communities. However, there will be some significant hindrances in being able to analyze how well the commission fulfilled this priority. Communities of interest are inherently subjective, amorphous, and qualitative; and it will be difficult to analyze the commission's success at protecting them.

This is in no way to undermine the importance the commission should place on communities of interest. It is simply to recognize that measuring the commission's success in this area will ultimately be ambiguous.

By contrast, partisan proportionality is quantitative and easily determined. You will be able to know whether you succeeded or failed at this task. I sincerely hope that the commission is dedicated to succeeding at implementing this priority.

A side note on communities of interest: because communities of interest are inherently subjective and because I did not have access to all of the commission's testimony and public comment, I tried to think of other ways of operationalizing the concept when working on this map. One item that I considered very strongly was internal transportation links. A number of the districts presented are attempts to link communities along major roads and highways. Transportation links are fundamental to the creation of community - social and commercial opportunities exist along major arterials that enable community. Districts 7, 15, and 22 are particularly marked by this thinking.

No consideration for incumbents

No consideration for incumbents was given when drawing the maps. I am broadly unfamiliar with where state senators live, and term limits mean that the map drawn this cycle will outlive all current incumbents anyway.

Respect for County and Municipal Boundaries

From my perspective, this priority has two functions. First, it makes it easier to determine who your legislator is. "Oh, you live in Westland. Your senator is _____." Second, it eases election administration by not requiring the local governments that run elections to manage multiple ballots. (As a Plymouth Township poll-worker for the past five years, I am very sensitive to this aspect.)

The proposed map is extremely respectful of municipal boundaries. Only Detroit, Sterling Heights, and Grand Rapids were split. Detroit must be split because it is so large. Sterling Heights is surrounded by other high population cities and was the most convenient to be split for population equality. Grand Rapids was split for partisan proportionality, which is explained when describing its two districts.

I usually prioritized not splitting municipalities over not splitting counties when the two were in conflict. In most cases, the opposite choice could be made without harm to the map.

The most difficult element of this provision is the number of cities that have unannexed land within them. The vast majority of my municipal splits come either from this or from a municipality crossing county lines.

Reasonable compactness

Compactness is normally a high priority in discussing redistricting reform. Gerrymandering is often mocked by showing highly contorted districts. But the framers of the Fair Districts Amendment placed it last among the priorities for the commission. With that in mind, I strove to maintain reasonable compactness where it did not hinder higher priorities. The application I used gave the overall plan a 77% compactness score.

It is important to note that compactness will tend to advantage the Republican party in our contemporary political environment. Democratic voters tend to cluster in urban areas, which the unwary mapmaker can then unintentionally pack in highly Democratic districts. Republicans then win many more suburban and rural seats with small but durable majorities.

Finally, I would like to note a priority that isn't presented -- aesthetics. Districts that "look nice" are excellent when feasible, but aesthetic considerations should never hinder the commission's dedication to its Constitutional duties.

Methods and Terminology

My application of choice for redistricting projects is Dave's Redistricting App ("DRA").

Due to my commitment to the Constitutional priority of partisan proportionality, I drew all maps with partisan data visible (unlike the commission's multi-stage process.)

Descriptions of political competitiveness are based on DRA's "Composite 2016-2020" data, which averages the results of the following contests:

- 2016 US President
- 2018 US Senator
- 2018 Michigan Governor
- 2018 Michigan Attorney General
- 2020 US President
- 2020 US Senator

I use four descriptions of competitiveness based on this average.

- Highly competitive - neither party received more than 52.5% of the averaged vote
- Competitive with a (Republic/Democratic) lean - one party won between 52.5% and 55% of the averaged vote
- Strongly (Republican/Democratic) - one party won between 55% and 60% of the averaged vote
- Safe (Republican/Democratic) - one party won more than 60% of the averaged vote

Note that six elections consist of a highly competitive race won by Republicans (2016 president), a competitive race won by Democrats (2018 Michigan Governor) and four highly competitive races won by Democrats (the rest.) A plan that is not disproportionately partisan in accordance with the Constitution should, when analyzed with this dataset, result in control of the State Senate resting on highly competitive districts, but with a small majority of seats won by Democrats. The presented map does that, showing a 21-17 Democratic majority and with a 100% proportionality rating in DRA's analytics. Control of the Senate (again, analyzed with this data set) would rest on District 32, a highly competitive district covering the Tri-Cities.

I also analyzed this map via Campaign Legal Center's PlanScore system. PlanScore uses four tests to assess the partisan proportionality of a plan: partisan efficiency, declination, partisan bias, and mean-median difference.

PlanScore rated the plan as having very low measures of bias.

- Partisan efficiency: 1.9% in favor of the Republican Party
- Declination: .09 in favor of the Republican Party
- Partisan bias: 2.5% in favor of the Republican Party
- Mean-median difference: 0.9% in favor of the Republican Party

Note that the first and last of these metrics are ones recommended to you by Dr. Handley.

The PlanScore analysis is available here:

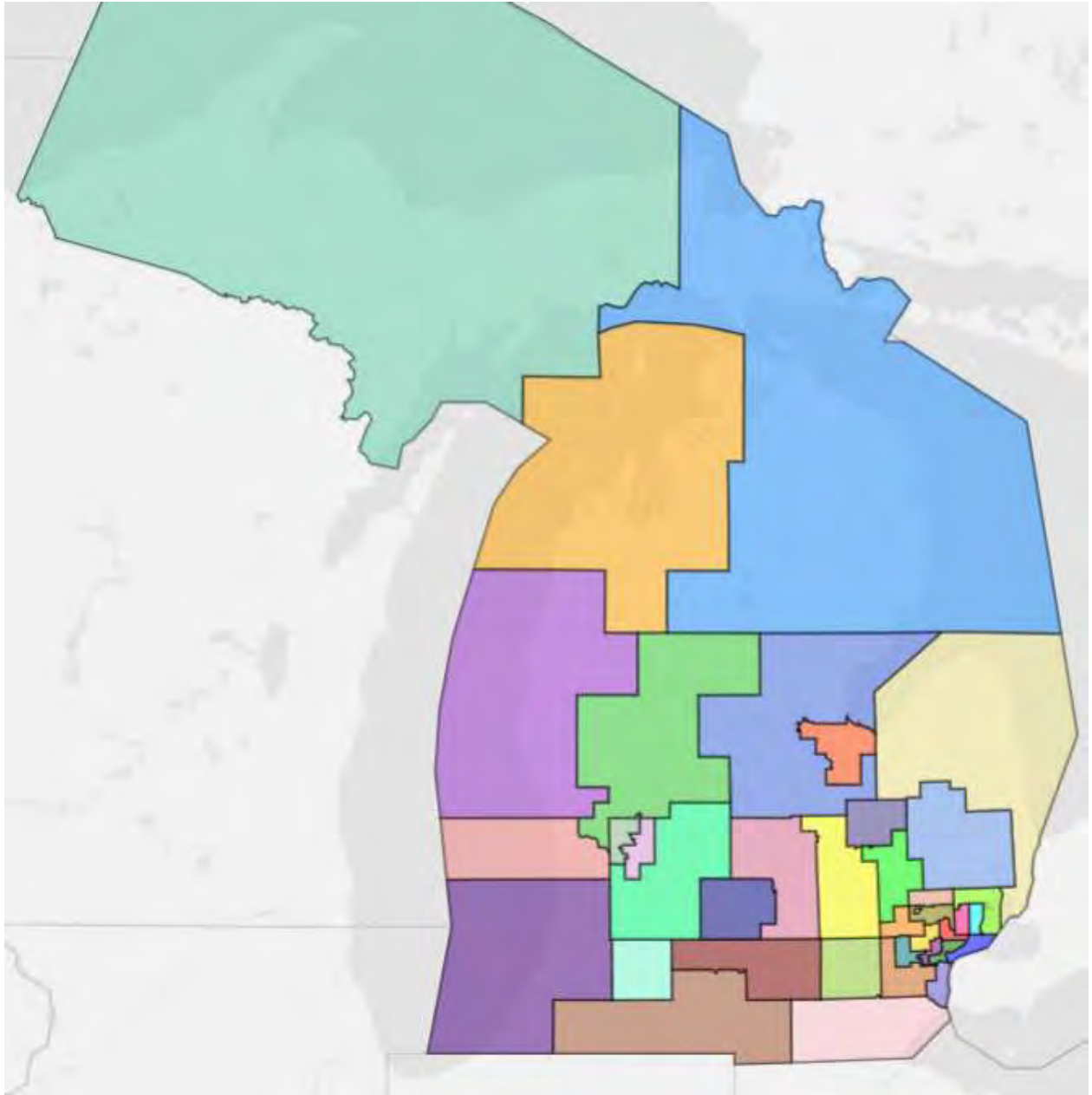
<https://planscore.campaignlegal.org/plan.html?20210908T163922.934916241Z>

Plan Overview

The full map is available at

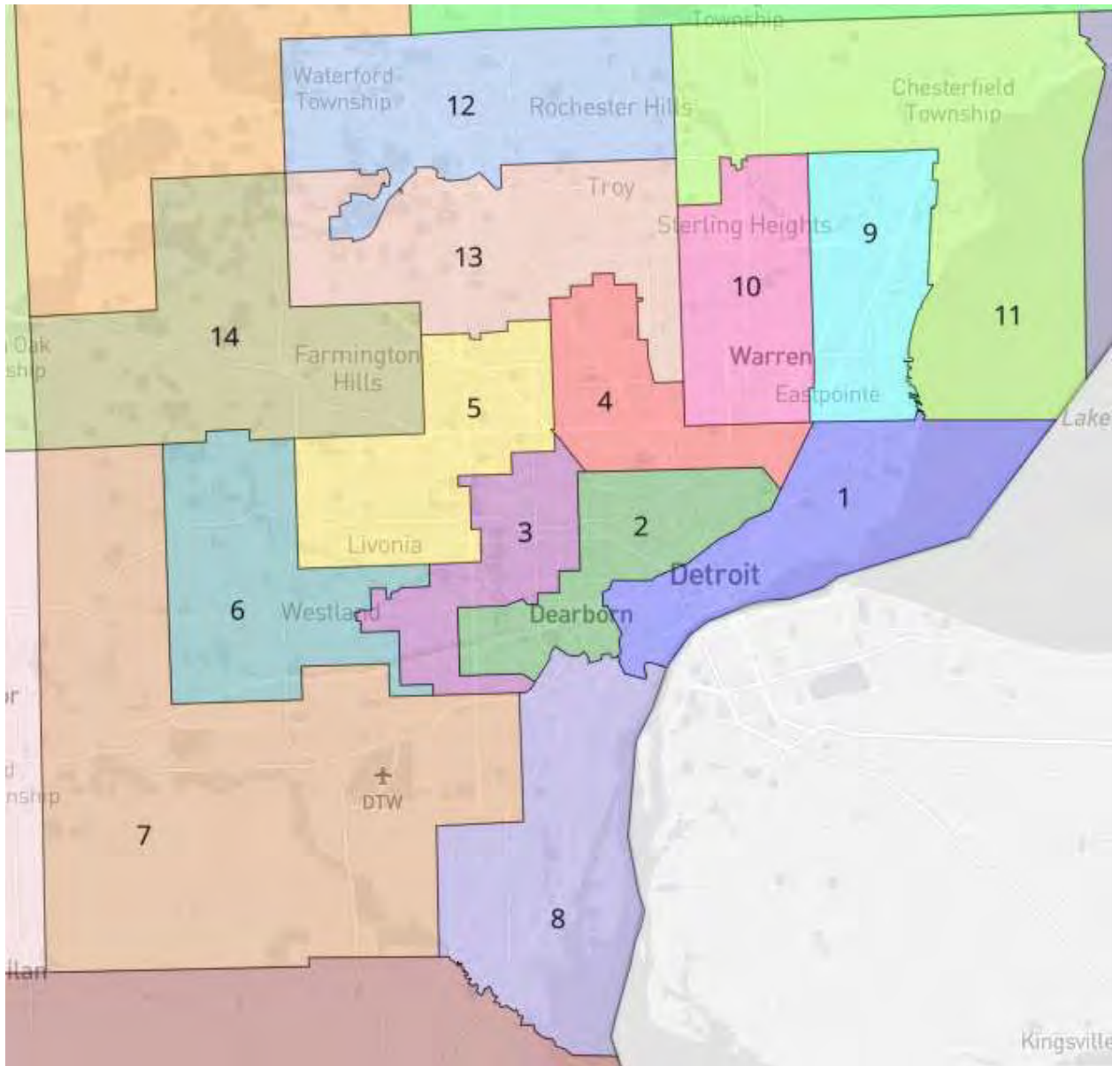
<https://davesredistricting.org/join/c7c24994-fc64-4d9b-be60-5ba8bca918b0>.

Overview map without county boundaries

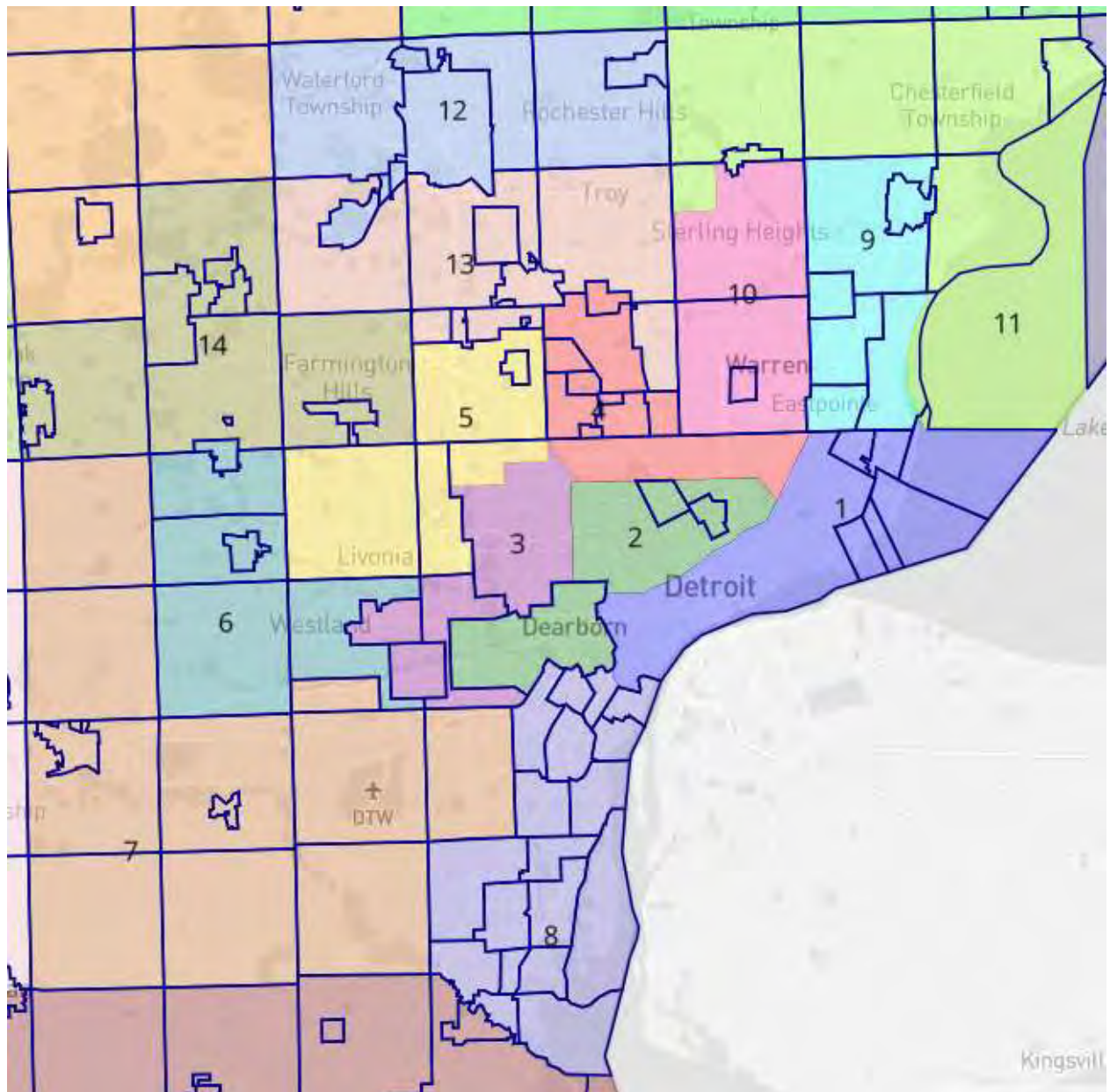


Metro Detroit

Overview map without municipal boundaries



Overview map with municipal boundaries



Districts 1 through 14 are located in the core urban and suburban portions of Metro Detroit: all of Wayne County along with southern Oakland and Macomb. One district extends into eastern Washtenaw.

Detroit-based districts: My first consideration was how to maintain five majority-minority districts that protect African-American voting rights in compliance with the VRA. With Detroit's continued population loss, I found it necessary to extend these districts across 8 Mile into Southfield and Oak Park to find sufficient African-American population.

- District 1 includes Harper Woods and the Grosse Pointes along with southern, downtown, and eastern Detroit. This district is connected along major arterials like the Ford Freeway and Jefferson Avenue.
- District 2 is Dearborn, Highland Park, Hamtramck, and central Detroit. This district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 3 joins western Detroit with Dearborn Heights, Garden City, and Inkster. Again, this district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 4 consists of northern Detroit and the many small cities between Southfield and Warren. The heart of this district is the Woodward corridor between Highland Park and Birmingham.
- District 5 is a suburban-focused district connecting Southfield, Livonia, Redford, and a small portion of far northwestern Detroit.

None of these districts split a municipality other than Detroit. Divisions in Detroit are generally along major roads. For example, the major boundaries between District 1 and 2 is Gratiot, between District 2 and 3 is Schaeffer Highway, and between District 2 and 4 is McNichols. Using major roads as boundaries within cities improves the public's capacity to understand the districts' layout.

They are all safe Democratic districts. As majority-minority districts designed to protect African-American voting rights, they are all highly likely to elect African American Democrats.

Wayne-based districts: The remaining Wayne County districts look to protect communities of interest while keeping in mind statewide partisan proportionality.

- District 6 takes in Northville, Plymouth, Canton, and Westland. It is connected along major arterials like Ford Road and I-275.
- District 7 is located in southwestern Wayne County and eastern Washtenaw. It is centered around the I-94 corridor and has a significant African American population.
- District 8 is a Downriver district. Public comment was overwhelmingly in favor of recognizing this community of interest where possible. It is connected along I-75 and Fort St (M-85).

I would particularly like to highlight District 7. Because it straddles the Wayne/Washtenaw border, I think the commission might otherwise miss this potential district. I believe that the I-94 corridor is a very real community of interest in terms of commuter and commercial flows. It brings together an aviation industrial interest by connecting Detroit Metro and Willow Run airports. Further, its population is about one-quarter African American, which makes it likely that African Americans would have a plurality of the Democratic primary vote in this district. This district would create a strong opportunity for African American representation outside of the city of Detroit.

None of these districts split a municipality other than Detroit, which is split along a major geographical feature.

District 6 would be strongly Democratic, District 7 safe Democratic, and District 8 competitive with a Democratic lean.

Macomb-based Districts: I drew three districts in the southern half of Macomb.

- District 9 consists of St. Clair Shores, Eastpointe, Roseville, Fraser, Clinton Twp, and Mount Clemens. This district is built around the Gratiot corridor as a community of interest.
- District 10 consists of Warren, Center Line, and most of Sterling Heights. This district is built around Mound and Van Dyke as arterial connectors.
- District 11 pulls together the outer band of rapidly growing suburbs: Harrison, Chesterfield Twp, New Baltimore, Macomb Twp, Shelby Twp, Utica, and a part of Sterling Heights for population equality.

These districts contain no county splits and one municipal split in Sterling Heights. The choice of which portion of Sterling Heights is attached to District 11 could easily be changed if the commission's community of interest testimony persuades it otherwise. My selected portion is north of 18 Mile and west of Mound Rd. I selected it to improve statewide proportionality.

I made the decision to run Districts 9 and 10 vertically instead of horizontally to 1) better follow the transportation arterials running north out of Detroit and 2) improve statewide proportionality.

District 9 is competitive with a Democratic lean, District 10 highly competitive, and District 11 strongly Republican.

Oakland-based Districts: I drew an additional three districts in southern and eastern Oakland.

- District 12 runs along M-59 in central Oakland, connecting Rochester/Rochester Hills, Auburn Hills, Pontiac, and Waterford Twp (along with some smaller adjacent communities.)
- District 13 combines the next line of cities to the south: Madison Heights, Troy, Bloomfield, Bloomfield Hills, Birmingham and West Bloomfield (along with the smaller communities just north of Southfield.) On its east side, it connected along the Chrysler Freeway. In the center, it includes a stretch of the Woodward corridor. I would guess that this district would have the highest average household income in the state.
- District 14 pulls together the southwestern portion of the county - Farmington/Farmington Hills, Novi, South Lyon/Lyon Twp, and Wixom/Walled Lake/Commerce Twp. This district is built around I-96/696 and the Grand River corridor.

These districts contain no county or municipal splits.

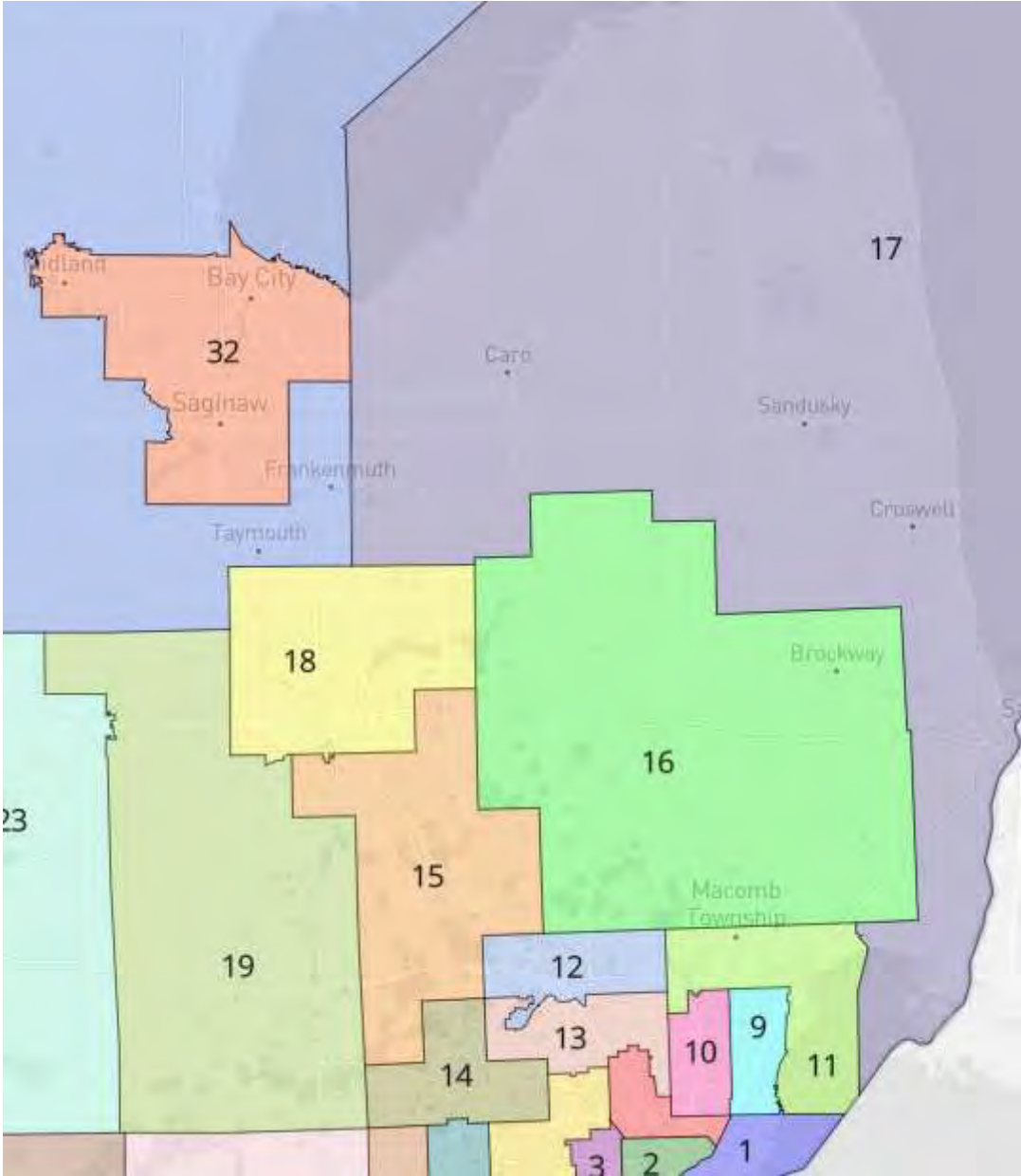
All three districts would be competitive with a Democratic lean.

Some additional notes on county and/or municipal splits in the Detroit region before moving on:

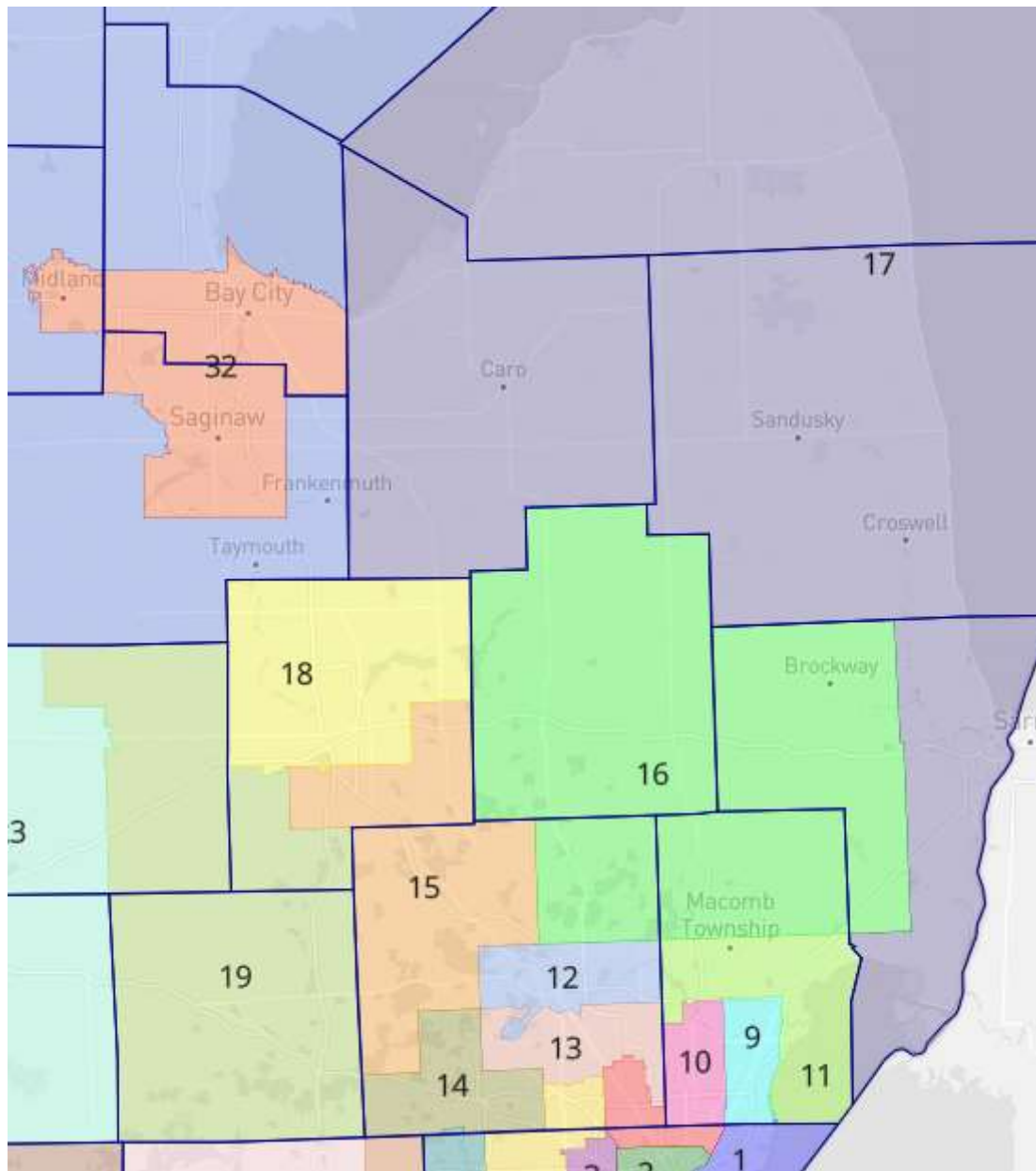
- District 1 includes all of Grosse Pointe Shores, including the Oakland County portion. That portion has a tiny population and could easily be moved to District 9 to split the municipality instead of the county, if desired.
- District 6 includes all of Northville, including the Oakland County portion. Although that portion contains several thousand people, it could be moved to District 14 to split the municipality instead of the county while both districts stay within legal population equality limits, if desired.
- District 8 includes a small portion of southern Detroit, specifically the areas south of the Rouge River. That portion is home to about 6,500 people. District 8 would still be within legal population equality limits without it, but boundaries inside Detroit would need to change as District 1 would go over population limits if it absorbed the area. Keeping it in District 8 preserves a small community of interest between African American residents of Ecorse, River Rouge, and that small slice of southern Detroit.

East Michigan

Overview map without county boundaries



Overview map with county boundaries



District 15 through District 18 are located in East Michigan - Genesee, northern and western Oakland, northern Macomb, and the Thumb.

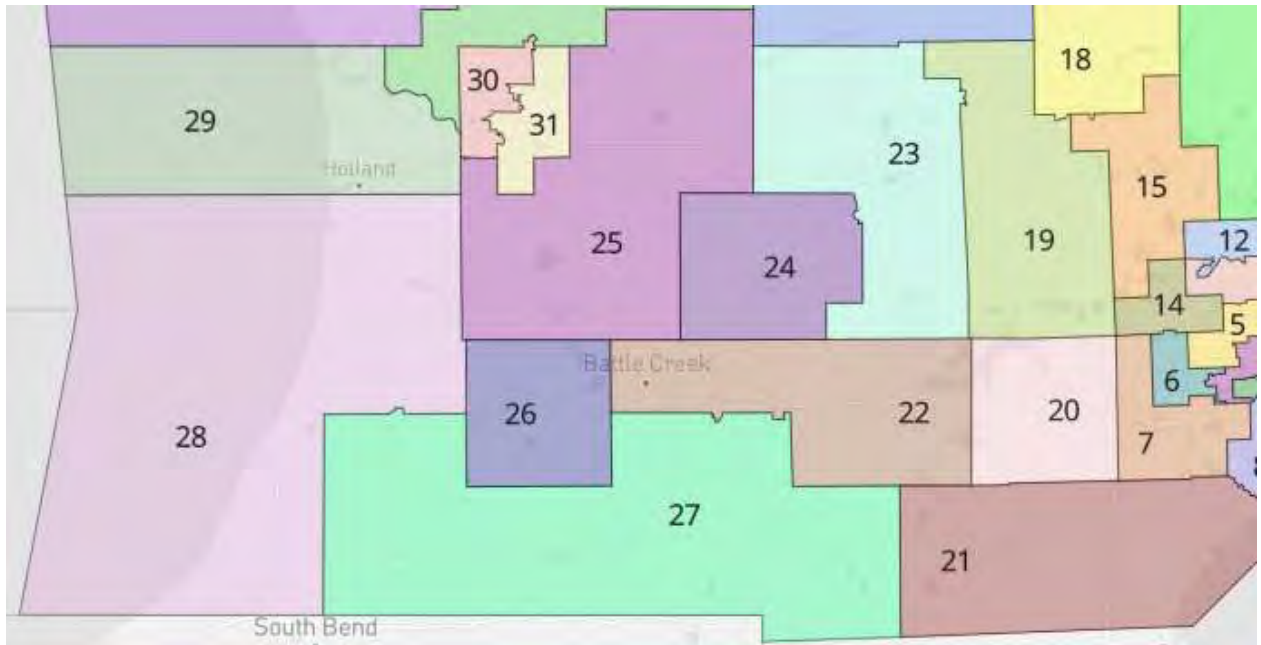
- District 15 is built around the I-75 corridor between Pontiac and Flint.
- District 16 pulls together exurban and rural areas anchored by Lapeer, combined with northeastern Oakland, northern Macomb, and western St. Clair
- District 17 is a Thumb district with Tuscola, Huron, and Sanilac along with the eastern, coastal portions of St. Clair.
- District 18 is a compact northern Genesee district anchored in Flint.

There are no municipal splits among these districts.

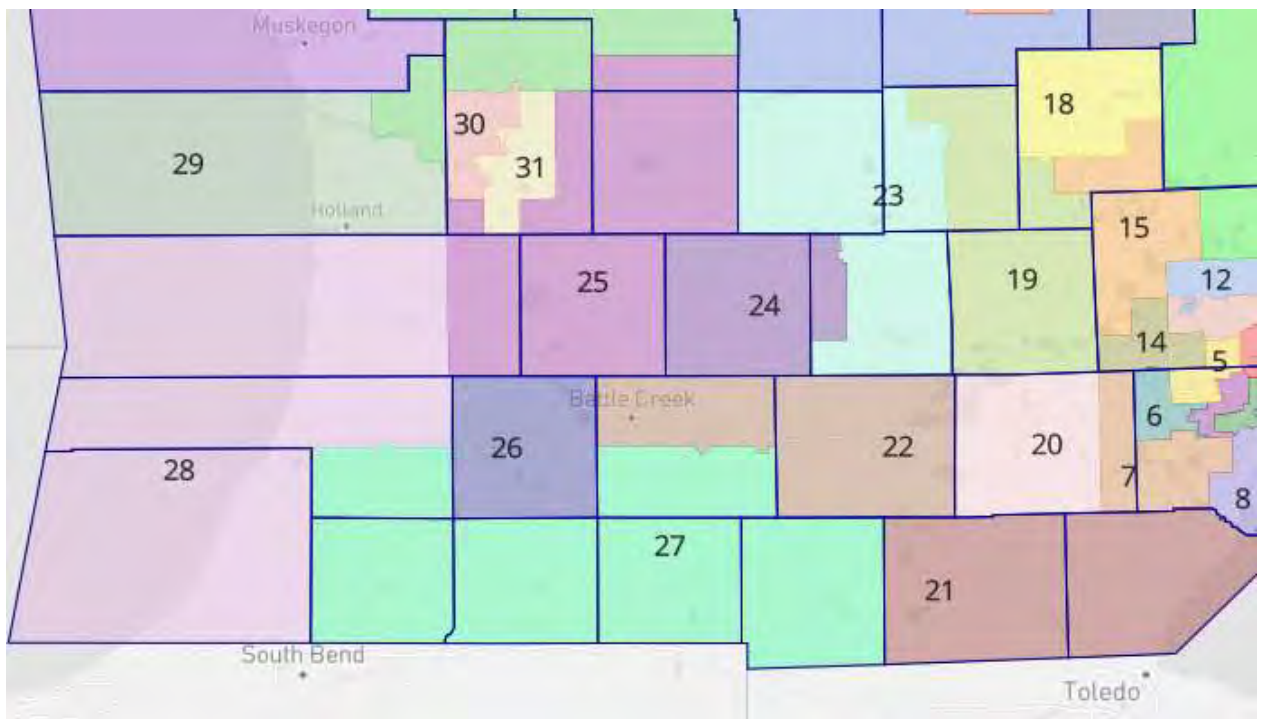
This is a heavily Republican section of the state. District 18 would be safe Democratic, and at about 30% African American, likely to elect an African American Democrat. District 15 which is strongly Republican and the other two safe Republican.

Southern, Central and Western Michigan

Overview map without county boundaries



Overview map with county boundaries



Central/South Michigan - Districts 19 through 24 are located in the greater Lansing and Ann Arbor areas. They cover all of Monroe, Lenawee, Livingston, Shiawassee, Clinton, Eaton, Ingham, and Jackson Counties; most of Washtenaw and Calhoun Counties; and part of Genesee County.

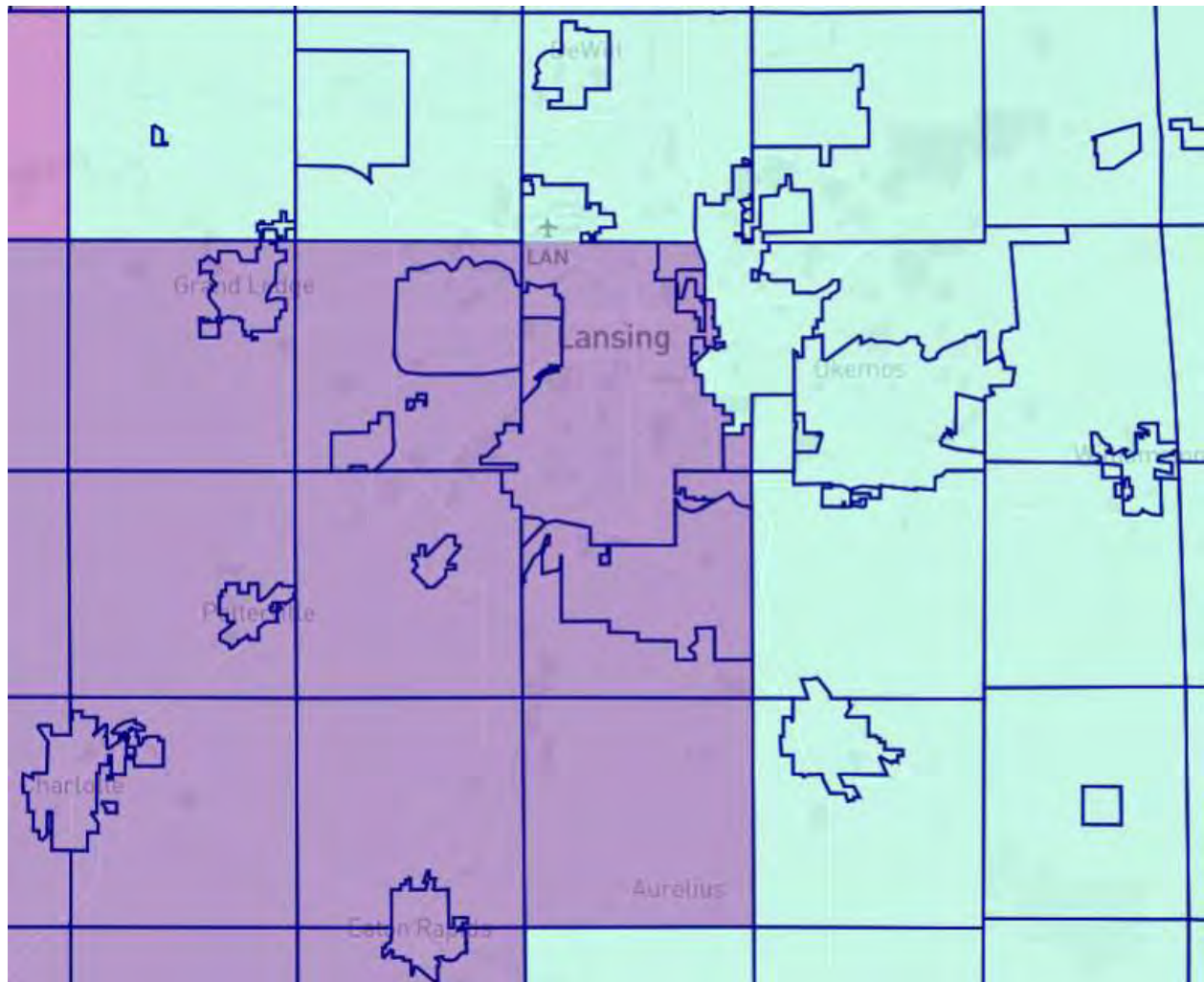
- District 19 is a suburban/exurban seat in the middle of Detroit, Flint, and Lansing. It combines all of Livingston County with southern Genesee and eastern Shiawassee.
- District 20 is a compact Washtenaw seat, anchored by Ann Arbor and containing its western bedroom communities.
- District 21 links Lenawee and Monroe, the two southeasternmost counties of the state.
- District 22 combines Jackson with northern Calhoun as a I-94/Michigan Ave corridor community of interest.
- District 23 is one of two Lansing area districts. This one combines Clinton, western Shiawassee, and most of Ingham.
- District 24 is the other Lansing seat. It combines Lansing proper with Eaton.

These six districts contain four county splits in Ingham, Shiawassee, Genesee, and Calhoun. These splits are due to population equalization -- these are all relatively large counties that would be difficult to recombine into fewer splits, especially while keeping the commission's other priorities in mind. They contain no municipal splits that aren't explained by enclaves or county boundaries.

Districts 20 and 21 are fairly self-explanatory, I think. District 22 pulls together the small industrial cities and towns along I-94/Michigan Ave and separates those small urban areas from the rural areas to their south. The Lansing area is roughly large enough for two districts. Splitting it into two districts that both contain urban cores is necessary for statewide proportionality to avoid advantaging the Republican party. Livingston is large enough to anchor its own district in District 19, and taking in southern Genesee follows a community of interest along US-23. Shiawassee County is split between Districts 19 and 23 largely for population equality as opposed to any other interest.

These six districts are split in party preference. Districts 19 and 21 are strongly Republican, while District 22 is competitive with a Republican lean. District 20 is safe Democratic, District 24 strongly Democratic, and District 23 competitive with a Democratic lean.

Close-up of the Lansing area with municipal boundaries



West/South Michigan - Districts 25 through 31 are located in the greater Grand Rapids and Kalamazoo areas. They cover all of Hillsdale, Branch, St. Joseph, Cass, Berrien, Van Buren, Kalamazoo, Allegan, Barry, and Ionia Counties; most of Ottawa and Kent Counties; and part of Calhoun and Montcalm Counties.

- District 25 is a district for Grand Rapids' eastern and southern suburbs and exurbs. It contains all of Barry and Ionia and parts of Kent, Allegan, and Montcalm.
- District 26 is a compact Kalamazoo seat, containing all of Kalamazoo County.
- District 27 pulls together the southern rural counties of Hillsdale, Cass, St. Joseph, and Branch with the southern halves of Calhoun and Van Buren. US-12 is a major arterial for this district.
- District 28 lies along the Lake Michigan coast south of Holland, containing Berrien, northern Van Buren, and most of Allegan.

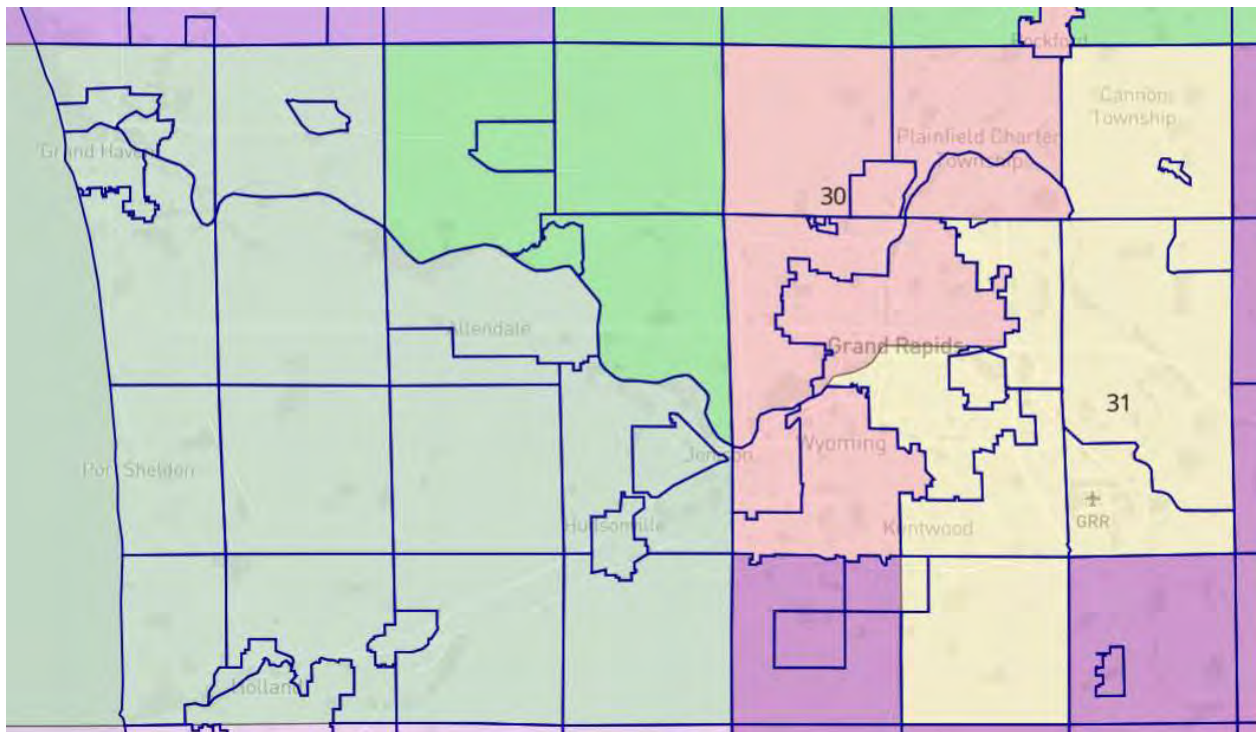
- District 29 is a compact Ottawa seat. Ottawa is too large for a single district, so far northeastern Ottawa is placed in District 34
- District 30 is one of two Grand Rapids-based seats, containing the western and northern portions of the “Six Cities” and extending into surrounding townships.
- District 31 is the other Grand Rapids-based seat, containing the eastern and southern portions of the “Six Cities” and extending into surrounding townships.

These seven districts contain six counties that are split between them, which are required for population equality. The city of Grand Rapids is the only municipality split, which is necessary for statewide proportionality. The split follows Fulton St and the Grand River. Splitting Grand Rapids itself allows it to anchor two districts with its suburban neighbors. Failure to split Grand Rapids packs urban voters and unfairly advantages the Republican party.

District 26 pretty much draws itself as a compact Kalamazoo seat. District 27 takes in the four rural counties to the south, along with the southern half of Calhoun that didn't fit into District 22 and enough of Van Buren for population equality. The shoreline District 28 takes in Berrien, the remainder of Van Buren, and most of Allegan for population equality. District 29 is most of Ottawa County - portions north and east of the Grand are excluded for population equality. Districts 30 and 31 take in the core portions of metro Grand Rapids in Kent County. District 25 is then Barry and Ionia combined with the remainder of Allegan, the remainder of southern and eastern Kent, and the southern tier of townships from Montcalm for population equality.

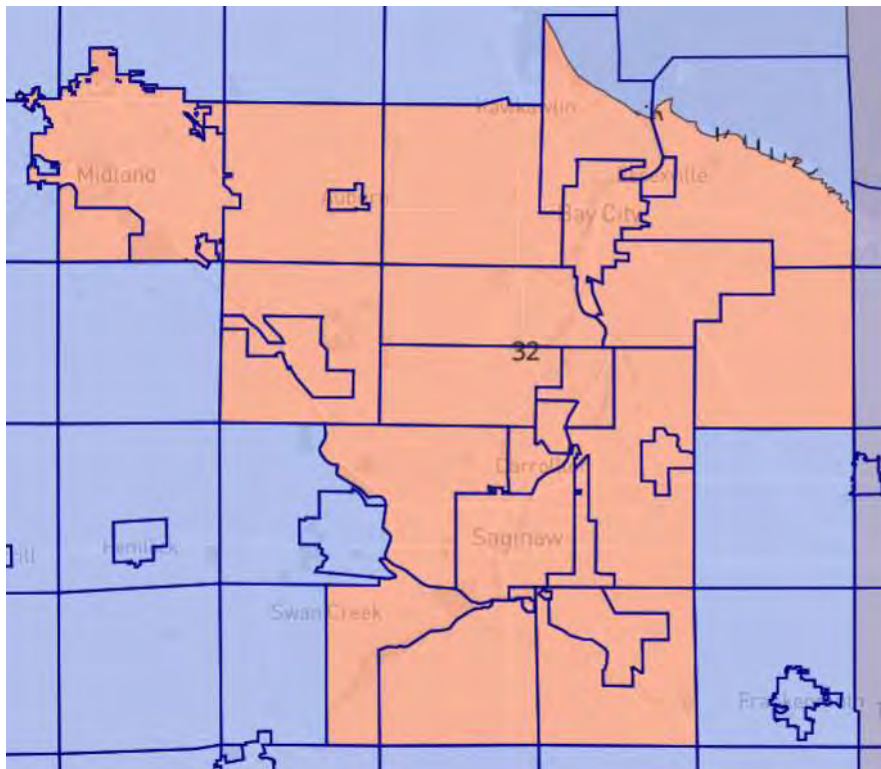
This region of the state favors Republicans, which is shown in the districts' partisan preferences. Districts 25, 27 and 29 are safe Republican; while District 28 is strongly Republican. Districts 26 and 31 are strongly Democratic. District 30 would be highly competitive.

Close-up of Kent and Ottawa with municipal boundaries



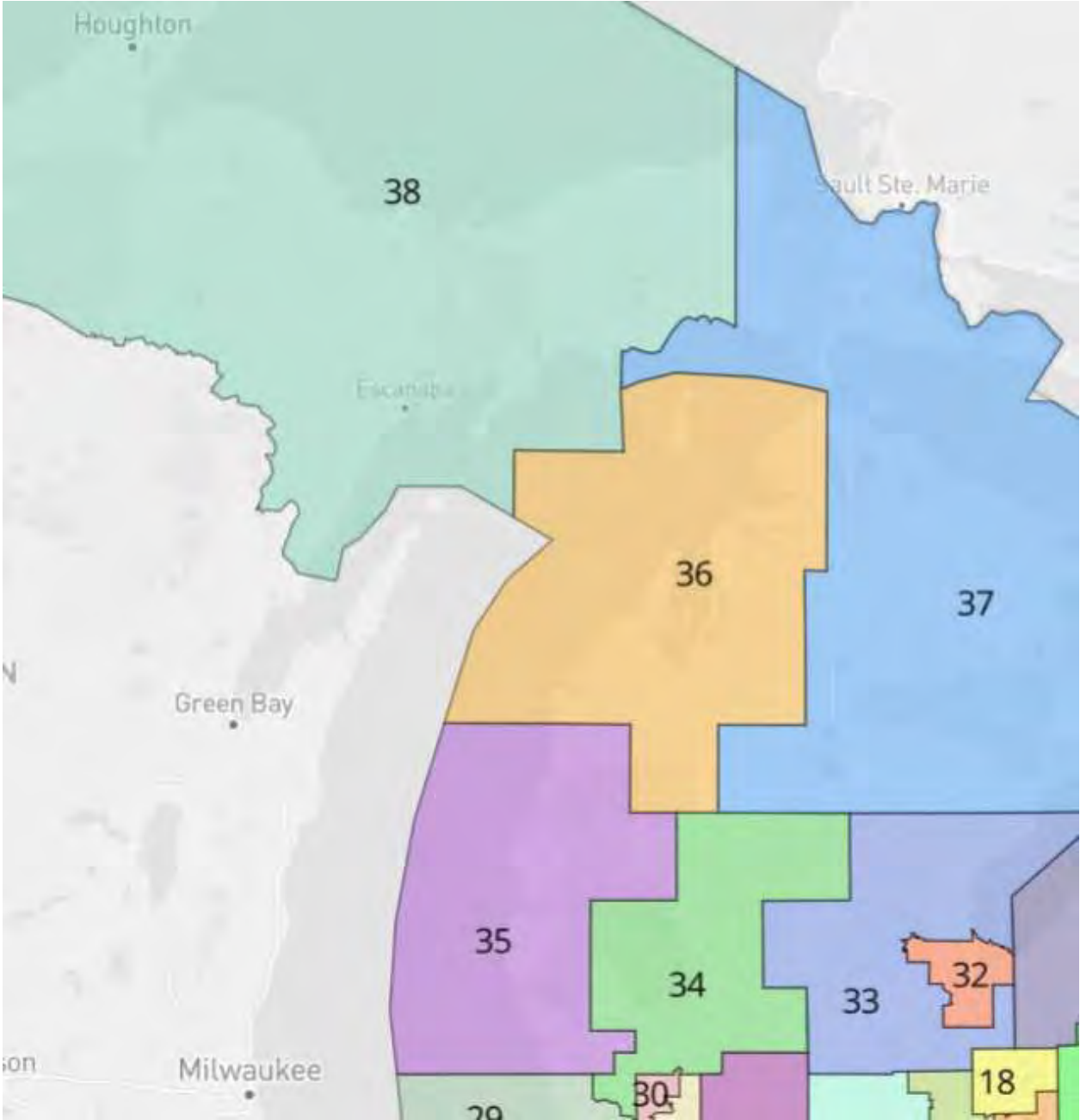
Note that the Cutlerville area south of Wyoming/Kentwood that appears to be split is a Census-designated place, not a true municipality

Close-up of the Tri-Cities Area with municipal boundaries

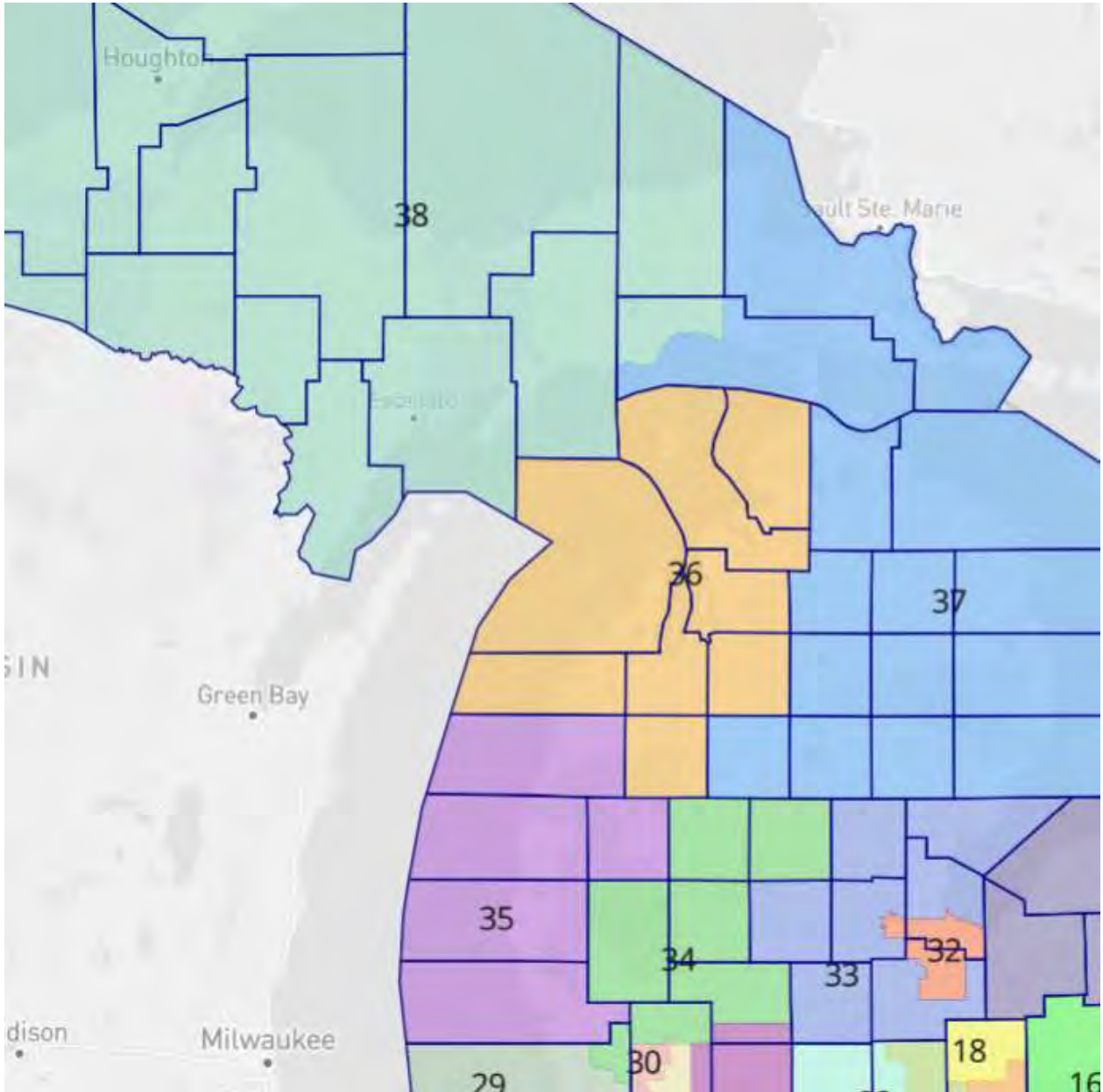


Northern Michigan

Overview map without county boundaries



Overview map with county boundaries



The remaining districts (32 through 38) are in northern Michigan - defined roughly as Muskegon, Newaygo, Montcalm, Gratiot, and Saginaw Counties; along with all counties north of them.

- District 32 is a compact Tri-Cities district, both in response to public comment to protect that community of interest and for statewide partisan proportionality.
- District 33 takes in the remainder of Saginaw, Bay, and Midland Counties, along with Arenac, Gladwin, Isabella, and Gratiot Counties. This creates a rural and small town community of interest district in east central Michigan to complement District 32's urban and suburban district.
- District 34 takes in the remainder of Kent, Ottawa, and Montcalm Counties and combines them with the interior counties to their north: Newaygo, Mecosta, Oceola, and Clare. This follows the M37 and US131 arterials going north from Grand Rapids.
- District 35 is a shoreline community of interest district with Muskegon, Oceana, Mason, and Manistee Counties. It also includes Lake County for population equality.
- District 36 is a community of interest district for Greater Traverse City. It includes Emmet, Charlevoix, Antrim, Kalkaska, Wexford, Grand Traverse, Leelanau, and Benzie.
- District 37 is 37's counterpart on the Lake Huron side, containing Missaukee, Roscommon, Ogemaw, Iosco, Alcona, Oscoda, Crawford, Otsego, Montmorency, Alpena, Presque Isle and Cheboygan Counties. For population equality, it crosses the Straights to take most of Mackinac and all of Chippewa.
- District 38 is the remainder of Mackinac and the remaining Upper Peninsula counties: Luce, Schoolcraft, Alger, Delta, Menominee, Dickinson, Marquette, Iron, Baraga, Houghton, Keweenaw, Ontonagon, and Gogebic.

These seven districts contain seven counties that are split, mostly in Districts 32 through 34. Districts 35 and 36 require no county splits, while District 38 requires a split of Mackinac or Chippewa for population equality.

District 34 splits come from taking in the portion of counties leftover in districts to its south and won't be rehashed.

Districts 32 and 33 split Saginaw, Bay, and Midland Counties between them. This is necessary both to protect the Tri-Cities community of interest and for statewide proportionality. District 32, as a compact urban seat across three counties, is specifically the kind of district that the Fair Districts amendment supports by deprioritizing boundary splits in favor of communities of interest and proportionality.

This area is mostly split between competitive districts and those that favor Republicans. Districts 32 and 35 are highly competitive, while District 38 is competitive with a Republican lean. Districts 33 and 36 are strongly Republican, while the remaining two are safe Republican.

Conclusion

The presented plan demonstrates that it is possible to adhere to the Constitutional priorities of equality of population and fidelity to federal law, contiguity, and preserving communities of interest, while also maximizing partisan proportionality. I hope that it will serve as a useful model for the commissioners as they seek to implement their Constitutional mandate. I thank the commissioners for their consideration.



Guidance under Section 2 of the Voting Rights Act, 52 U.S.C. 10301, for redistricting and methods of electing government bodies

Published September 1, 2021

The Voting Rights Act of 1965 is a landmark civil rights law that protects our democratic process against racial discrimination. One of the key protections of the Voting Rights Act is Section 2, 52 U.S.C. § 10301, which is a permanent nationwide prohibition on voting practices that discriminate on the basis of race, color, or membership in a language minority group (as defined in Sections 4(f)(2) and 14(c)(3) of the Act, 52 U.S.C. §§ 10303(f)(2), 10310(c)(3)). Section 2 prohibits both voting practices that result in citizens being denied equal access to the political process on account of race, color, or membership in a language minority group, and voting practices adopted or maintained for the purpose of discriminating on those bases.

Section 2 covers any voting qualification or prerequisite to voting or standard, practice, or procedure related to voting. As relevant for purposes of this guidance, Section 2 covers methods of electing public officials. This coverage includes a variety of electoral practices, such as: 1) districting plans used in single-member district election systems or multi-member district election systems; 2) mixed election systems, e.g., any combination of single-member, multi-member and at-large seats, and any associated districting plans; and 3) at-large election systems.



U.S. Department of Justice

Following the release of 2020 Census redistricting data, all fifty States and thousands of counties, parishes, municipalities, school districts, and special purpose districts will craft new districting plans. The Department of Justice will undertake its usual nationwide reviews of districting plans and methods of electing governmental bodies to evaluate compliance with Section 2. It is the Department's view that guidance identifying its general approach to Section 2 in this context would be useful. This guidance is not legally binding, nor is it intended to be comprehensive; rather, it is intended only to aid jurisdictions as they comply with Section 2.¹

The discussion provides guidance concerning the following topics:

- [Enforcement of Section 2 by the Department of Justice](#)
- [Section 2 Analysis: Discriminatory Result](#)
- [Section 2 Analysis: Discriminatory Intent](#)
- [Other Federal Laws Governing Redistricting](#)
- [Use of 2020 Census Data](#)
- [Complaints and Comments](#)

¹ In connection with the 2000 and 2010 Census redistricting cycles, the Department of Justice issued guidance concerning redistricting under Section 5 of the Voting Rights Act, 52 U.S.C. § 10304, which establishes preclearance requirements for voting changes in certain covered jurisdictions. 76 Fed. Reg. 7470 (February 9, 2011); 67 Fed. Reg. 5411 (January 18, 2001). In 1973, the Supreme Court held that redistricting is a "standard, practice, or procedure with respect to voting" within the meaning of Section 5. *Georgia v. United States*, 411 U.S. 526, 531-35 (1973). The Department's guidance focused on Section 5 because it was the provision under which the Department initially reviewed redistricting plans for covered jurisdictions. However, in 2013, the Supreme Court held that the coverage formula in Section 4(b) of the Act, 52 U.S.C. § 10303(b), which determines which jurisdictions are required to comply with Section 5, is now unconstitutional. *Shelby County v. Holder*, 570 U.S. 529, 557 (2013). Hence, as the Department has described previously, there are no jurisdictions currently covered by Section 5, and jurisdictions previously covered by the Section 4(b) formula do not need to seek preclearance for new voting changes, such as redistricting plans, absent enactment of a new coverage provision. At present, the only jurisdictions that need to seek preclearance for redistricting plans (or other changes in methods of election) are those covered for such changes by a current federal court order entered under Section 3(c) of the Act, 52 U.S.C. § 10302(c). The Department's prior guidance concerning redistricting under Section 5 is no longer operative. It may still be of assistance to jurisdictions in complying with Section 3.



Enforcement of Section 2 by the Department of Justice

Congress has charged the Attorney General with responsibility for enforcement of the Voting Rights Act on behalf of the United States. 52 U.S.C. § 10308(d). The Department of Justice has delegated that enforcement to the Assistant Attorney General for the Civil Rights Division. 28 C.F.R. § 0.50. The Division has in turn vested enforcement responsibility for the civil provisions of the Voting Rights Act and other federal voting rights laws in the Voting Section. Justice Manual § 8-2.271. The Division's decisions regarding initiation or settlement of litigation are committed to the Assistant Attorney General. 28 C.F.R. §§ 0.50, 0.160; Justice Manual § 8-2.270. The Division can also consider participating as amicus curiae in cases in any federal or state court that raise issues under Section 2 of the Voting Rights Act. See, e.g., 28 U.S.C. § 517.

Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, prohibits discrimination in voting on the basis of race, color, or membership in a language minority group. This permanent, nationwide prohibition applies to any voting qualification or prerequisite to voting or standard, practice, or procedure, including districting plans and methods of election for governmental bodies. *Grove v. Emison*, 507 U.S. 25, 39-40 (1993).

As amended in 1982, Section 2 prohibits voting practices that result in citizens being denied equal access to the political process on account of race, color, or membership in a language minority group. It also continues to prohibit adopting or maintaining voting practices for the purpose of disadvantaging citizens on account of race, color, or membership in a language minority group. *Chisom v. Roemer*, 501 U.S. 380, 394 n.21 (1991). The essence of a discriminatory results claim alleging vote dilution is that a certain electoral law, practice, or structure interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by minority voters to elect their preferred representatives. *Thornburg v. Gingles*, 478 U.S. 30, 47 (1986). Regardless of whether an electoral law or practice violates Section 2's results test, Section 2 also prohibits any electoral law, practice, or procedure enacted or maintained with the intent to disadvantage voters because of their race, color, or membership in a



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language minority group. States and political subdivisions should take the Voting Rights Act's requirements into account when redrawing electoral maps, altering a method of election, or maintaining a method of election that could have the potential to discriminate.

The Department of Justice enforces Section 2 of the Voting Rights Act across the country. The Department's efforts to evaluate compliance with Section 2 and identify potential violations have a very broad scope. This work encompasses jurisdictions of all types that conduct elections for their governmental bodies. Thus, the Department reviews methods of election for U.S. House of Representatives seats, state legislatures, county commissions, city councils, school boards, judicial bodies, special governmental units with elected boards, and more. Likewise, the Department evaluates all kinds of methods of election, including at-large election systems, districting plans involving multi-member districts, districting plans using single-member districts, and mixed methods of election. The Department evaluates districting plans and methods of election for compliance with Section 2 regardless of whether those plans or methods were adopted by legislative bodies, local boards, redistricting commissions, state courts, or other governmental bodies. The Department's analysis of compliance with Section 2 is intensely localized insofar as it looks to the particular facts in each jurisdiction and that jurisdiction's method of election. Historically, the great majority of Section 2 cases brought by the Department have addressed concerns about racial discrimination in voting at the local level. The Department will monitor for compliance with Section 2 around the country in this decade, as it has in prior decades.²

When the Assistant Attorney General for the Civil Rights Division authorizes a Section 2 enforcement action, the Division seeks to resolve matters amicably and avoid protracted litigation where it is feasible to do so.³

² Following release of the decennial census data, this work extends throughout each decade. The fact that the Department has not challenged a particular jurisdiction's method of election over any given time period does not constitute agreement that it complies with Section 2.

³ Some examples of recent Section 2 enforcement matters involving methods of election for governmental bodies that were settled by consent decree include *United States v. City of West Monroe*, No. 3:21 cv 00988 (W.D. La. Apr. 14, 2021), ECF No. 4 (board of aldermen); *United States v. Chamberlain School District*, No. 4:20 cv 04084 (D.S.D. June 18, 2020), ECF No. 4 (school board); and *United States v. City of Eastpointe*, No. 2:17 cv 10079 (E.D. Mich. June 25, 2019), ECF No. 64 (city council).



The Department's Section 2 cases challenging methods of election for governmental bodies include actions against a variety of jurisdictions, including states, counties, municipalities, school districts, and special districts.⁴

The Department's cases under Section 2 have also challenged a variety of different methods of election, including at-large election systems, as well as district-based election systems and mixed election systems involving a combination of at-large elections and district elections.⁵

In the course of investigating and bringing enforcement actions under Section 2 of the Voting Rights Act, the Department applies well-established case law, which is briefly described below.

⁴ See, e.g., *United States v. Texas*, No. 5:11 cv 00360 (W.D. Tex.), ECF No. 907 (state legislative and congressional districts); *United States v. Charleston County*, No. 2:01 cv 00155 (D.S.C.) (county commission); *United States v. Marion County*, No. 4:99 cv 00151 (M.D. Ga.) (county commission); *United States v. Morgan City*, No. 6:00 cv 01541 (W.D. La.) (city council); *United States v. City of Lawrence*, No. 1:98 cv 12256 (D. Mass.) (city council and school board); *United States v. Village of Port Chester*, No. 1:06 cv 15173 (S.D.N.Y.) (board of trustees); *United States v. Georgetown County School District*, No. 2:08 cv 00889 (D.S.C.) (school board); and *United States v. Upper San Gabriel Valley Municipal Water District*, No. 2:00 cv 07903 (C.D. Cal.) (board of directors for special purpose district).

⁵ See, e.g., *United States v. Blaine County*, No. 4:99 cv 00122 (D. Mont.) (at large elections for county commission); *United States v. School Board of Osceola County*, No. 6:08 cv 00582 (M.D. Fla.) (single member district plan for school board); *United States v. Crockett County*, No. 1:01 01129 (W.D. Tenn.) (multi member district system for county commission); *United States v. South Dakota*, No. 3:00 cv 03015 (D.S.D.) (multi member district in state legislative districting plan); *United States v. City of Euclid*, No. 1:06 cv 01652 (N.D. Ohio) (mixed at large and ward method of election for city council).



Section 2 Analysis: Discriminatory Result

Section 2 of the Voting Rights Act prohibits, among other things, any electoral practice or procedure that minimizes or cancels out the voting strength of members of racial or language minority groups in the voting population. This phenomenon is known as vote dilution.

In *Thornburg v. Gingles*, 478 U.S. 30 (1986), the Supreme Court set out the framework for challenges to such practices or procedures. In *Brnovich v. Democratic National Committee*, 141 S. Ct. 2321, 2337 (2021), the Supreme Court described *Gingles* as “our seminal § 2 vote-dilution case” and recognized that “[o]ur many subsequent vote-dilution cases have largely followed the path that *Gingles* charted.”

Analysis begins by considering whether three *Gingles* preconditions exist. First, the minority group must be sufficiently large and geographically compact to constitute a majority of the voting-age population in a single-member district. Second, the minority group must be politically cohesive. And third, the majority must vote sufficiently as a bloc to enable it – in the absence of special circumstances, such as the minority candidate running unopposed – usually to defeat the minority group’s preferred candidate.

If all three *Gingles* preconditions are present, consideration proceeds to an analysis of the totality of the circumstances in a jurisdiction. This analysis incorporates factors enumerated in the Senate Report that accompanied the 1982 Voting Rights Act Amendments, S. Rep. No. 97-417, at 28-29 (1982), which are generally known as the “Senate Factors.” These factors are themselves drawn from earlier case law. *Id.* at 28 nn. 112-113. The factors include:



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1. the extent of any history of official discrimination in the state or political subdivision that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process;
2. the extent to which voting in the elections of the state or political subdivision is racially polarized;
3. the extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group;
4. if there is a candidate slating process, whether the members of the minority group have been denied access to that process;
5. the extent to which members of the minority group in the state or political subdivision bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process;
6. whether political campaigns have been characterized by overt or subtle racial appeals; and
7. the extent to which members of the minority group have been elected to public office in the jurisdiction.

The Senate Report also identified two additional factors that have probative value in some cases:

- whether there is a significant lack of responsiveness on the part of elected officials to the particularized needs of the members of the minority group; and
- whether the policy underlying the state or political subdivision's use of such voting qualification, prerequisite to voting, or standard, practice or procedure is tenuous.

The Senate Factors are neither comprehensive nor exclusive, and other factors may also be relevant and may be considered. For example, the Supreme Court held in *Johnson v. De Grandy*, 512 U.S. 997, 1000 (1994), that proportionality of minority voters' representation in a single-member district plan is also a relevant fact in the totality of circumstances. A finding of vote dilution in violation of Section 2 does not require that a particular number or a majority of these factors is present in a jurisdiction.



Gingles describes a review of the totality of the circumstances that requires a “searching practical evaluation of the past and present reality” of a jurisdiction’s electoral system that is “intensely local,” “fact-intensive,” and “functional” in nature. 478 U.S. at 45-46, 62-63, 79. Liability depends on the unique factual circumstances of each case and the totality of the circumstances in the particular jurisdiction in question. Thus, for example, the Supreme Court found that Texas’s use of multimember state legislative districts impermissibly diluted minority voting strength, see *White v. Regester*, 412 U.S. 755, 765-70 (1973), while concluding that Indiana’s use of multimember state legislative districts did not, *Whitcomb v. Chavis*, 403 U.S. 124, 148-55 (1971).

As the cases recognize, Section 2 vote-dilution violations can take several different forms. At-large election systems or multimember districts can submerge minority voters within a larger majority electorate that can effectively control all available positions. *Gingles*, 478 U.S. at 48-49. Districting plans may dilute minority voting strength by cracking or “fragmenting the minority voters among several districts where a bloc-voting majority can routinely outvote them” or by “packing them into one or a small number of districts to minimize their influence.” *De Grandy*, 512 U.S. at 1007; see also *Gingles*, 478 U.S. at 46 n.11. Some plans may do both.



Section 2 Analysis: Discriminatory Intent

Section 2 of the Voting Rights Act also prohibits use of a redistricting plan or method of election adopted or maintained for a discriminatory purpose, which is the same prohibition imposed by the Fourteenth and Fifteenth Amendments.

The Department will examine the circumstances surrounding adoption or continued use of a redistricting plan or method of election to determine whether there is direct or circumstantial evidence of any discriminatory purpose of denying or abridging the right to vote on account of race, color, or membership in a language minority group. See, e.g., *White*, 412 U.S. at 765-70; *Rogers v. Lodge*, 458 U.S. 613, 623-27 (1982).

Direct evidence detailing a discriminatory purpose may be gleaned from the public statements of members of the adopting body or others who may have played a significant role in the process. See, e.g., *Busbee v. Smith*, 549 F. Supp. 494, 508 (D.D.C. 1982) (three-judge court), *aff'd*, 459 U.S. 1166 (1983). However, “smoking gun” or other stark evidence of intent is rare and is not required to establish a discriminatory purpose. The Department will also evaluate whether circumstantial evidence establishes a discriminatory intent. For example, in *League of United Latin American Citizens v. Perry*, 548 U.S. 399, 440 (2006), the Supreme Court suggested that reducing Hispanic/Latino voting strength in a district because a growing Hispanic/Latino community appeared poised to vote out an incumbent “bears the mark of intentional discrimination.”

When assessing evidence of a possible discriminatory purpose, the Department of Justice is guided by the Supreme Court’s decision in *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252 (1977); see also *Brnovich*, 141 S. Ct. at 2349 (citing the “familiar approach outlined in *Arlington Heights*”).

Arlington Heights outlines a non-exhaustive list of factors relevant to this “sensitive inquiry”: (1) The impact of the decision; (2) the historical background of the decision, particularly if it reveals a series of



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decisions undertaken with discriminatory intent; (3) the sequence of events leading up to the decision; (4) whether the challenged decision departs, either procedurally or substantively, from the normal practice; and (5) contemporaneous statements and viewpoints held by the decisionmakers. 429 U.S. at 266-68. The Senate Factors (described above) may also provide evidence of discriminatory intent. *Rogers*, 458 U.S. at 620-21.

Discriminatory intent implies that the decisionmaker selected or reaffirmed a particular course of action at least in part because of, and not merely in spite of, its adverse effects upon an identifiable minority group. The Department of Justice will draw the normal inferences from the foreseeability of a discriminatory impact, and Section 2 does not require proof that one or more government actors are “racist” or bear racial animus. A concurring opinion in *Garza v. County of Los Angeles*, 918 F.2d 763 (9th Cir. 1990), provides a useful example of intentional discrimination without racial animus.

Assume you are an anglo homeowner who lives in an all-white neighborhood. Suppose, also, that you harbor no ill feelings toward minorities. Suppose further, however, that some of your neighbors persuade you that having an integrated neighborhood would lower property values and that you stand to lose a lot of money on your home. On the basis of that belief, you join a pact not to sell your house to minorities. Have you engaged in intentional racial and ethnic discrimination? Of course you have. Your personal feelings toward minorities don’t matter; what matters is that you intentionally took actions calculated to keep them out of your neighborhood.

Id. at 778 n.1 (Kozinski, J., concurring in part and dissenting in part); see also *N.C. State Conf. of the NAACP v. McCrory*, 831 F.3d 204, 222 (4th Cir. 2016). Discriminatory intent need only be one motivating factor behind the enactment or enforcement to violate Section 2. It need not be the only motivating factor. So, for example, if a jurisdiction purposefully reduces minority voting strength in order to protect an incumbent elected official, the fact that incumbent protection was a motivating factor — or even the primary motivating factor — does not mean a plan is lawful. See, e.g., *LULAC*, 548 U.S. at 440; *Garza*, 918 F.2d at 771.



Other Federal Law Governing Redistricting

Section 2 of the Voting Rights Act is the Department of Justice’s principal tool to protect voters from racial discrimination regarding redistricting and methods of election for governmental bodies. The U.S. Constitution imposes additional requirements on redistricting plans beyond those in Section 2 of the Act. The Fourteenth Amendment prohibits substantial disparities or malapportionment in total population between electoral districts in the same districting plan (colloquially known as the “one-person, one-vote” principle). *Baker v. Carr*, 369 U.S. 186 (1962). The Fourteenth Amendment also prohibits certain forms of racial gerrymandering in drawing electoral districts. *Shaw v. Reno*, 509 U.S. 630 (1993).

The Department does not enforce these particular constitutional requirements directly through Section 2. However, the Department will consider these background constitutional requirements when enforcing Section 2. For example, malapportioned districts may facilitate vote dilution, and district boundaries drawn predominantly on the basis of race may provide evidence of discriminatory intent. In addition, the Department will consider whether any efforts to change the apportionment base for a districting plan to a measure other than total population (e.g., to equalize eligible voter population between districts) may violate Section 2 if the resulting districting plan, “designedly or otherwise,” will “operate to minimize or cancel out” the voting strength of racial minority groups. *Burns v. Richardson*, 384 U.S. 73, 88 (1966) (quoting *Fortson v. Dorsey*, 379 U.S. 433, 439 (1965)). See U.S. Amicus Brief at 32-35, filed in *Evenwel v. Abbott*, No. 14-940 (U.S. Sept. 25, 2015).

Finally, in any lawsuit in which the Department participates, it will propose remedies that are consistent with the requirements of the U.S. Constitution.⁶

⁶ Beyond the requirements of Section 2 of the VRA, and the U.S. Constitution, districting plans and methods of election may be subject to other federal or state requirements as well. See, e.g., 2 U.S.C. § 2c (requiring the use of single member districts to elect members of the U.S. House of Representatives).



Use of 2020 Census Data

Consistent with past practice, the Department of Justice will evaluate districting plans and methods of election using the 2020 Census redistricting data set issued by the Census Bureau pursuant to Public Law 94-171, 13 U.S.C. § 141(c). The Census Bureau released the 2020 Census redistricting data to the States and the public on August 12, 2021.⁷

As in 2010 and 2000, the 2020 Census Public Law 94-171 data will include counts of persons who have identified themselves as members of more than one racial category. This reflects the October 30, 1997, decision by the Office of Management and Budget (OMB) to incorporate multiple-race reporting into the Federal statistical system. 62 Fed. Reg. 58,782. Likewise, on March 9, 2000, OMB issued Bulletin No. 00-02 addressing “Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Enforcement.” Part II of that Bulletin describes how such census responses will be allocated by Federal executive agencies for use in civil rights monitoring and enforcement.

The Department of Justice will follow both aggregation methods defined in Part II of the Bulletin. The Department’s initial review will be based upon allocating any response that includes white and one of the five other race categories identified in the response. Thus, the total numbers for “Black/African American,” “Asian,” “American Indian/Alaska Native,” “Native Hawaiian or Other Pacific Islander,” and “Some other race” reflect the total of the single-race responses and the multiple responses in which an individual selected a minority race and white race.

The Department will then move to the second step in its application of the census data by reviewing the other multiple-race category, which is comprised of all multiple-race responses consisting of more than one minority race. Where there are significant numbers of such responses, the Department will, as

⁷ In circumstances where states aim, pursuant to state law, to reallocate certain group quarters populations (such as individuals confined in correctional facilities), the Department will review these data as well.



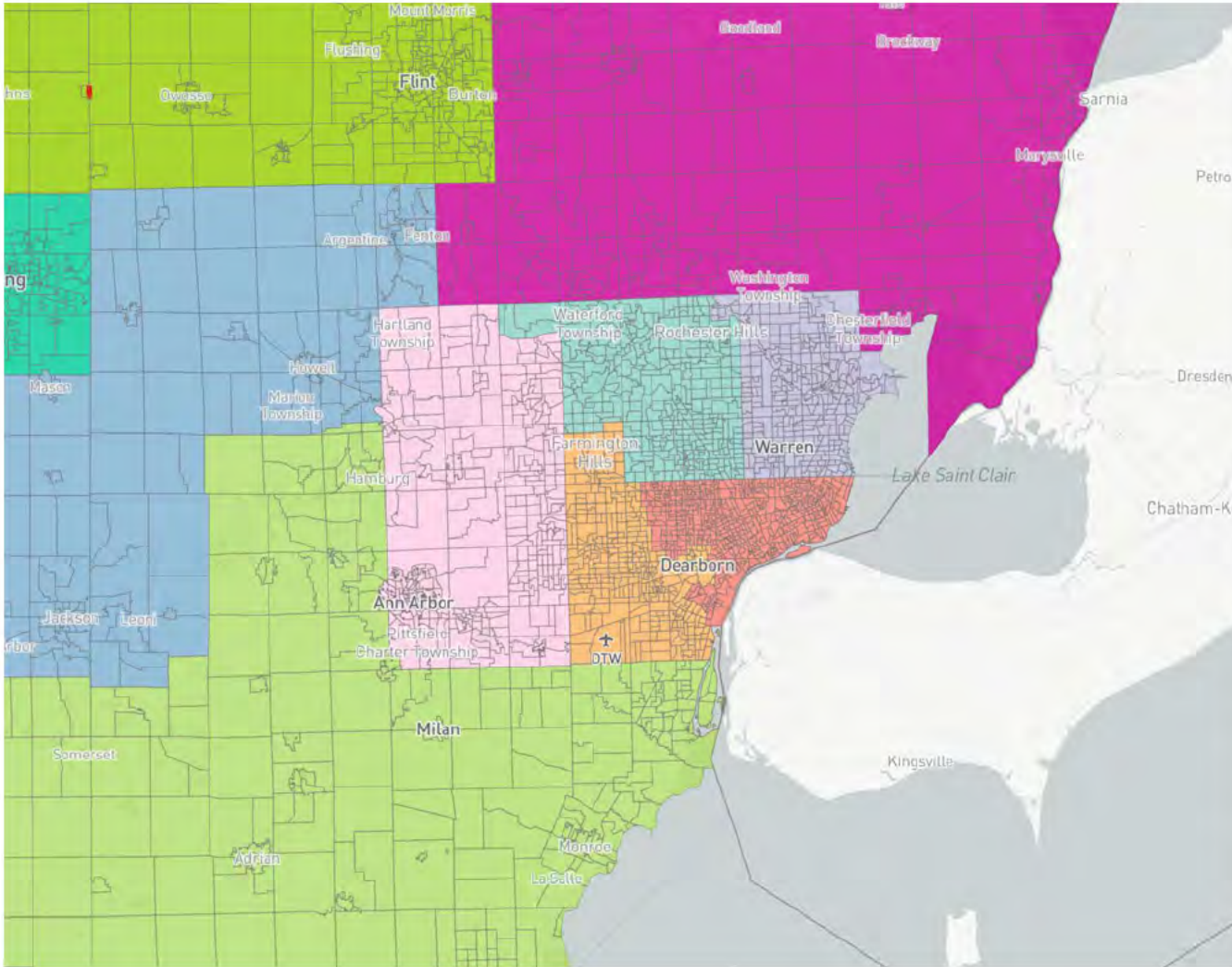
required by both the OMB guidance and judicial opinions, allocate these responses on an iterative basis to each of the component single-race categories for analysis. *Georgia v. Ashcroft*, 539 U.S. 461, 473, n.1 (2003).

As in the past, the Department will analyze Hispanic/Latino persons as a separate minority group for purposes of enforcement of the Voting Rights Act, pursuant to Sections 2, 4(f)(2), and 14(c)(3) of the Act. 52 U.S.C. §§ 10301, 10303(f)(2), 10310(c)(3). The Census asks respondents to answer both the Hispanic origin question and the race question. A Hispanic/Latino tabulation of Census data includes those who respond affirmatively to the Hispanic origin question, irrespective of their response to the race question, e.g., white, a minority race, “some other race” or multiple races. If there are significant numbers of responses in a jurisdiction that self-identify as Hispanic/Latino and one or more minority races (for example, Hispanics/Latinos who list their race as Black/African American), the Department will conduct its initial analysis by allocating those responses to the Hispanic/Latino category and then repeat its analysis by allocating those responses to the relevant minority race category.



Complaints and Comments

Members of the public are encouraged to send any complaints or comments regarding possible violations of the federal voting rights laws to the Voting Section. This can include complaints or comments about methods of election or districting plans that may violate Section 2 of the Voting Rights Act. This can also include requests for the Department to consider participation in cases as amicus curiae on issues under the federal voting rights laws. Finally, this can include comments regarding this guidance document. Complaints and comments can be submitted online through the Civil Rights Division's website portal – civilrights.justice.gov. The Voting Section can also be reached through its toll-free number: (800) 253-3931.



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About the data

Save plan

Districtr homepage

New plan

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Export Districtr-JSON

Export plan as SHP

Export plan as GeoJSON

Export assignment as CSV

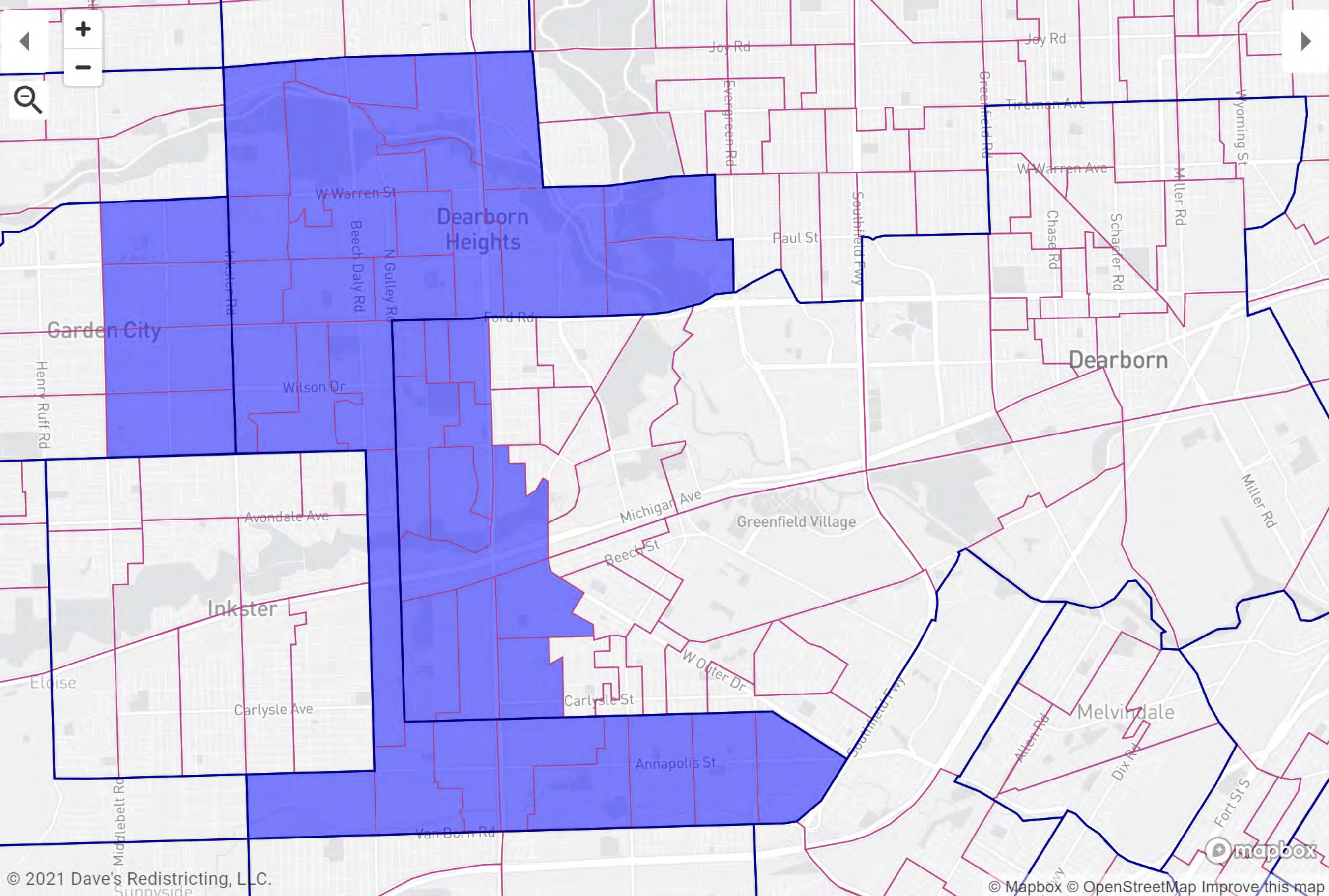
About import/export options

- Hidden
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Demographics

▶ Population by Race

▶ Coalition Builder



Dearborn Heights

Garden City

Dearborn

Inkster

Greenfield Village

Melvindale



Cover Letter for State Senate Submission

Dear Commissioners,

I was a fellow applicant to the commissioner pool, equally committed to the cause of Fair Districts in Michigan. This submission is an honest effort to draw a State Senate map subject to the same guidelines and priorities laid out for you in the Michigan Constitution:

- Equality of population and compliance with federal law
- Contiguity
- Protection of communities of interest
- Avoidance of partisan disproportionality
- No consideration for incumbents
- Respect for county and municipal boundaries
- Reasonable compactness

I gave particular attention to priority four while still giving full diligence to the items above it. As you may already be discovering, the avoidance of partisan disproportionality is a difficult task given our contemporary political environment. It will require a careful and specific focus on your part in order to fulfill this priority. This proposed plan has very low levels of partisan bias – it favors Republicans by only about two percent on two of the metrics your consultant recommended to you.

In full disclosure: I applied as a Democratic commissioner. I do not believe that I allowed my own partisan preferences to unduly persuade me, but I will let you be the judge of that.

Finally, I would like to ask that you review my proposed District 7 in particular. I believe that it brings together an important community of interest across the Wayne-Washtenaw border that the commission might otherwise miss.

Sincerely,
Corey Mason
Plymouth Township, Wayne County, Michigan

Principles and Priorities

I am a longtime political enthusiast with a graduate-level education in political science and a genuine enjoyment of electoral cartography. That is to say that I am a nerd who has thought a lot about this stuff. I'd like to start with a short summary of my approach to district-drawing and my assessment and use of the Constitutional priorities guiding the commission.

My approach to district-drawing is fundamentally iterative and collaborative. The districts I'm presenting are the result of dozens of hours of drawing and redrawing and are informed by the perspectives of a number of other plans I've reviewed. I would encourage the commission to be diligent in trying and considering a variety of approaches to the problems of districting-drawing -- in my experience, the first few maps attempted for any given purpose will benefit greatly from synthesizing a variety of ideas and from iterative refinement.

With regards to the Constitutional priorities of the commission:

Equality of population and compliance with federal law

Version 9.6 of the commission's *Mapping Process and Procedures* gives a maximum population deviation of +/- 5% for state legislative districts (that is, a 10% range from the smallest to the largest districts by population). This gives mapmakers flexibility to protect other important priorities like the ones in the Michigan Constitution.

I made full use of this flexibility, with a net deviation of 9.69%. This deviation was never used for the purposes of partisan proportionality (for example, making one party's districts systematically larger than the others.) It was instead used to comply with the municipal boundary priority.

Compliance with federal law regarding minority voting rights was at the forefront of my mind in drawing, especially in metro Detroit. Analyzing a map for Voting Rights Act ("VRA") compliance requires attorneys, but this is an honest lay effort to protect minority voting rights.

Contiguity

All districts are contiguous by land, except District 37 which must cross the Straits of Mackinac for population equality.

Protections of communities of interest and avoidance of partisan disproportionality

I am going to discuss these two elements together because they are at the heart of what Fair Districts are all about -- these two elements are what is truly new about redistricting in Michigan this cycle. If the commission does not succeed at implementing both of these priorities, then I think it will have failed to carry out the vision of Fair Districts.

Gerrymandering is bad for a variety of reasons, but the two most important are covered by these priorities. Gerrymandering frequently unites very disparate regions for partisan advantage. It also, by definition, is an attempt to lock in partisan advantage over and against the collective will of the voters.

Michigan's current map, from the 2010 redistricting cycle, exemplifies both of these tendencies. It ignores communities of interest by separating urban areas from each other, drowning them with rural voters. (See current districts 16, 19 and 31, which were intended to smother any possibility of Democratic senators from Jackson, Battle Creek, and Bay City, respectively.) It also locked in an enduring Republican majority, despite the fact the Democratic state senate candidates have frequently won more votes in the statewide aggregate.

(In fact, Republican gerrymanders have locked up the state legislature for two decades, despite the fact that Michigan has been a competitive-to-Democratic leaning state in statewide elections during that time period.)

It is important to note that these two priorities cover different areas of analysis. Communities of interest are analyzed on a district-by-district basis; partisan proportionality is analyzed on a statewide level. Giving both of these priorities the attention they deserve will require a careful interplay of consideration of both individual districts and the overall plan.

Communities of interest are real and important. The commission has done an admirable job in soliciting and reviewing public comment to help it understand how voters view their communities. However, there will be some significant hindrances in being able to analyze how well the commission fulfilled this priority. Communities of interest are inherently subjective, amorphous, and qualitative; and it will be difficult to analyze the commission's success at protecting them.

This is in no way to undermine the importance the commission should place on communities of interest. It is simply to recognize that measuring the commission's success in this area will ultimately be ambiguous.

By contrast, partisan proportionality is quantitative and easily determined. You will be able to know whether you succeeded or failed at this task. I sincerely hope that the commission is dedicated to succeeding at implementing this priority.

A side note on communities of interest: because communities of interest are inherently subjective and because I did not have access to all of the commission's testimony and public comment, I tried to think of other ways of operationalizing the concept when working on this map. One item that I considered very strongly was internal transportation links. A number of the districts presented are attempts to link communities along major roads and highways. Transportation links are fundamental to the creation of community - social and commercial opportunities exist along major arterials that enable community. Districts 7, 15, and 22 are particularly marked by this thinking.

No consideration for incumbents

No consideration for incumbents was given when drawing the maps. I am broadly unfamiliar with where state senators live, and term limits mean that the map drawn this cycle will outlive all current incumbents anyway.

Respect for County and Municipal Boundaries

From my perspective, this priority has two functions. First, it makes it easier to determine who your legislator is. "Oh, you live in Westland. Your senator is _____." Second, it eases election administration by not requiring the local governments that run elections to manage multiple ballots. (As a Plymouth Township poll-worker for the past five years, I am very sensitive to this aspect.)

The proposed map is extremely respectful of municipal boundaries. Only Detroit, Sterling Heights, and Grand Rapids were split. Detroit must be split because it is so large. Sterling Heights is surrounded by other high population cities and was the most convenient to be split for population equality. Grand Rapids was split for partisan proportionality, which is explained when describing its two districts.

I usually prioritized not splitting municipalities over not splitting counties when the two were in conflict. In most cases, the opposite choice could be made without harm to the map.

The most difficult element of this provision is the number of cities that have unannexed land within them. The vast majority of my municipal splits come either from this or from a municipality crossing county lines.

Reasonable compactness

Compactness is normally a high priority in discussing redistricting reform. Gerrymandering is often mocked by showing highly contorted districts. But the framers of the Fair Districts Amendment placed it last among the priorities for the commission. With that in mind, I strove to maintain reasonable compactness where it did not hinder higher priorities. The application I used gave the overall plan a 77% compactness score.

It is important to note that compactness will tend to advantage the Republican party in our contemporary political environment. Democratic voters tend to cluster in urban areas, which the unwary mapmaker can then unintentionally pack in highly Democratic districts. Republicans then win many more suburban and rural seats with small but durable majorities.

Finally, I would like to note a priority that isn't presented -- aesthetics. Districts that "look nice" are excellent when feasible, but aesthetic considerations should never hinder the commission's dedication to its Constitutional duties.

Methods and Terminology

My application of choice for redistricting projects is Dave's Redistricting App ("DRA").

Due to my commitment to the Constitutional priority of partisan proportionality, I drew all maps with partisan data visible (unlike the commission's multi-stage process.)

Descriptions of political competitiveness are based on DRA's "Composite 2016-2020" data, which averages the results of the following contests:

- 2016 US President
- 2018 US Senator
- 2018 Michigan Governor
- 2018 Michigan Attorney General
- 2020 US President
- 2020 US Senator

I use four descriptions of competitiveness based on this average.

- Highly competitive - neither party received more than 52.5% of the averaged vote
- Competitive with a (Republic/Democratic) lean - one party won between 52.5% and 55% of the averaged vote
- Strongly (Republican/Democratic) - one party won between 55% and 60% of the averaged vote
- Safe (Republican/Democratic) - one party won more than 60% of the averaged vote

Note that six elections consist of a highly competitive race won by Republicans (2016 president), a competitive race won by Democrats (2018 Michigan Governor) and four highly competitive races won by Democrats (the rest.) A plan that is not disproportionately partisan in accordance with the Constitution should, when analyzed with this dataset, result in control of the State Senate resting on highly competitive districts, but with a small majority of seats won by Democrats. The presented map does that, showing a 21-17 Democratic majority and with a 100% proportionality rating in DRA's analytics. Control of the Senate (again, analyzed with this data set) would rest on District 32, a highly competitive district covering the Tri-Cities.

I also analyzed this map via Campaign Legal Center's PlanScore system. PlanScore uses four tests to assess the partisan proportionality of a plan: partisan efficiency, declination, partisan bias, and mean-median difference.

PlanScore rated the plan as having very low measures of bias.

- Partisan efficiency: 1.9% in favor of the Republican Party
- Declination: .09 in favor of the Republican Party
- Partisan bias: 2.5% in favor of the Republican Party
- Mean-median difference: 0.9% in favor of the Republican Party

Note that the first and last of these metrics are ones recommended to you by Dr. Handley.

The PlanScore analysis is available here:

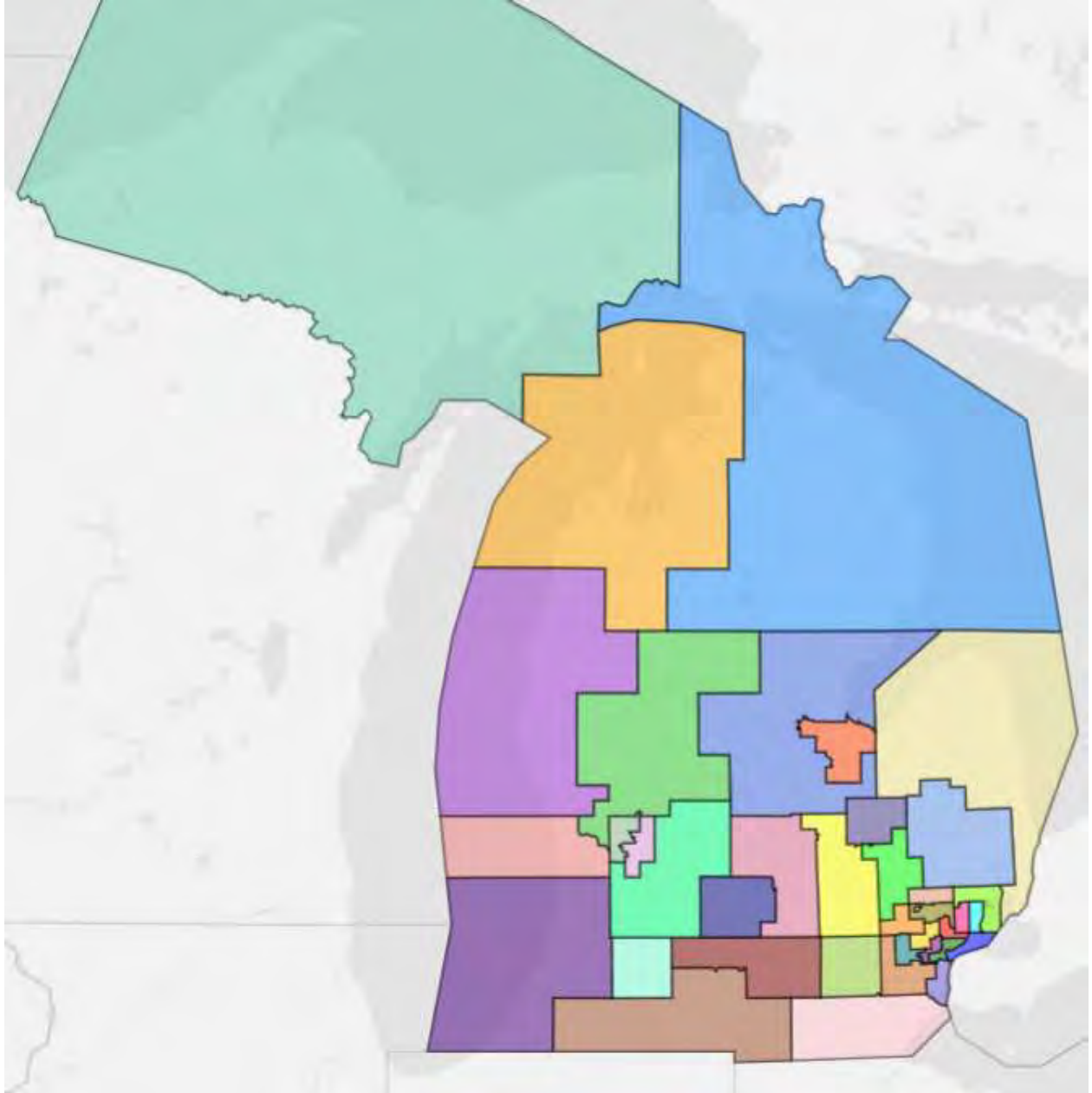
<https://planscore.campaignlegal.org/plan.html?20210908T163922.934916241Z>

Plan Overview

The full map is available at

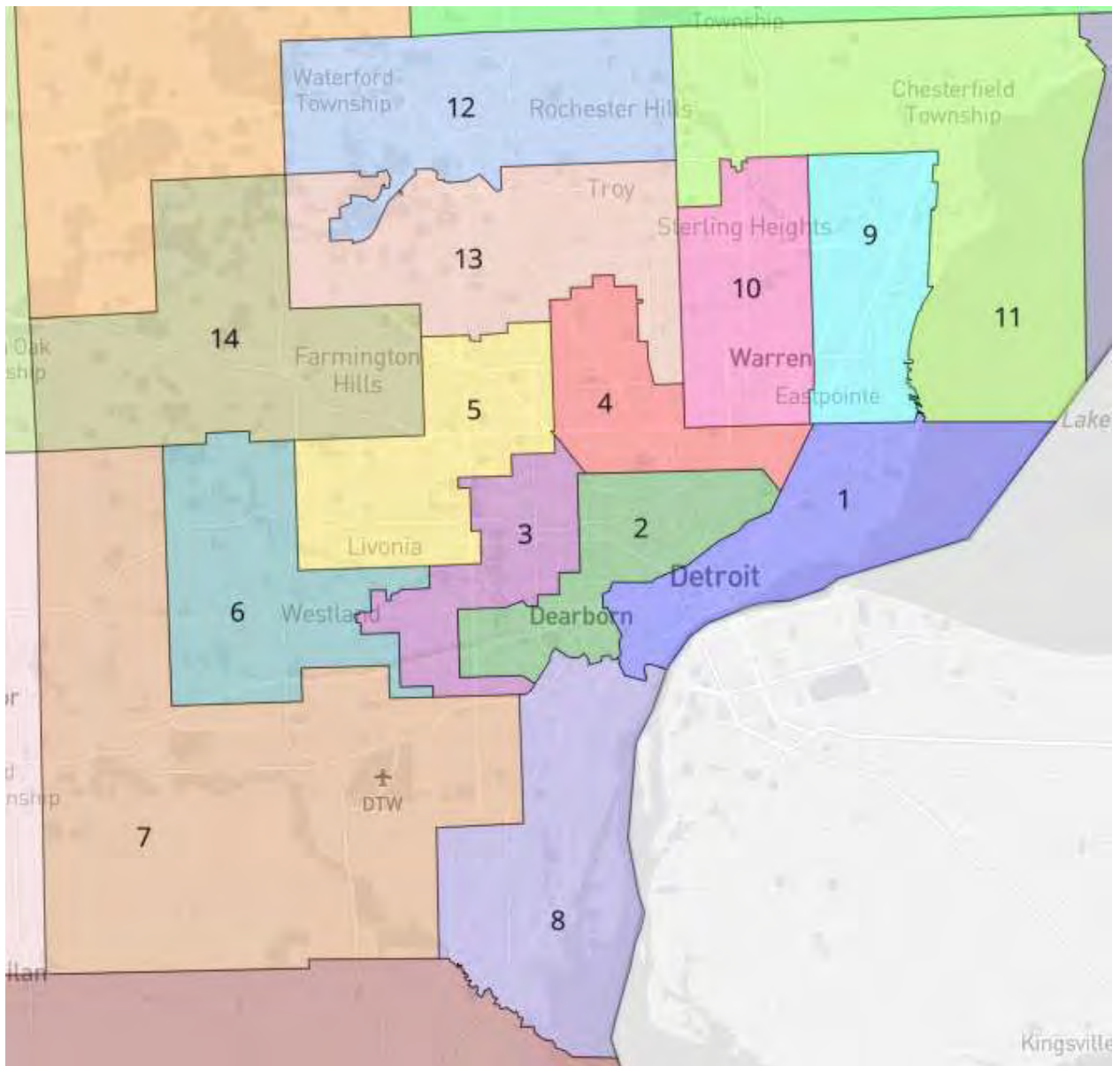
<https://davesredistricting.org/join/c7c24994-fc64-4d9b-be60-5ba8bca918b0>.

Overview map without county boundaries

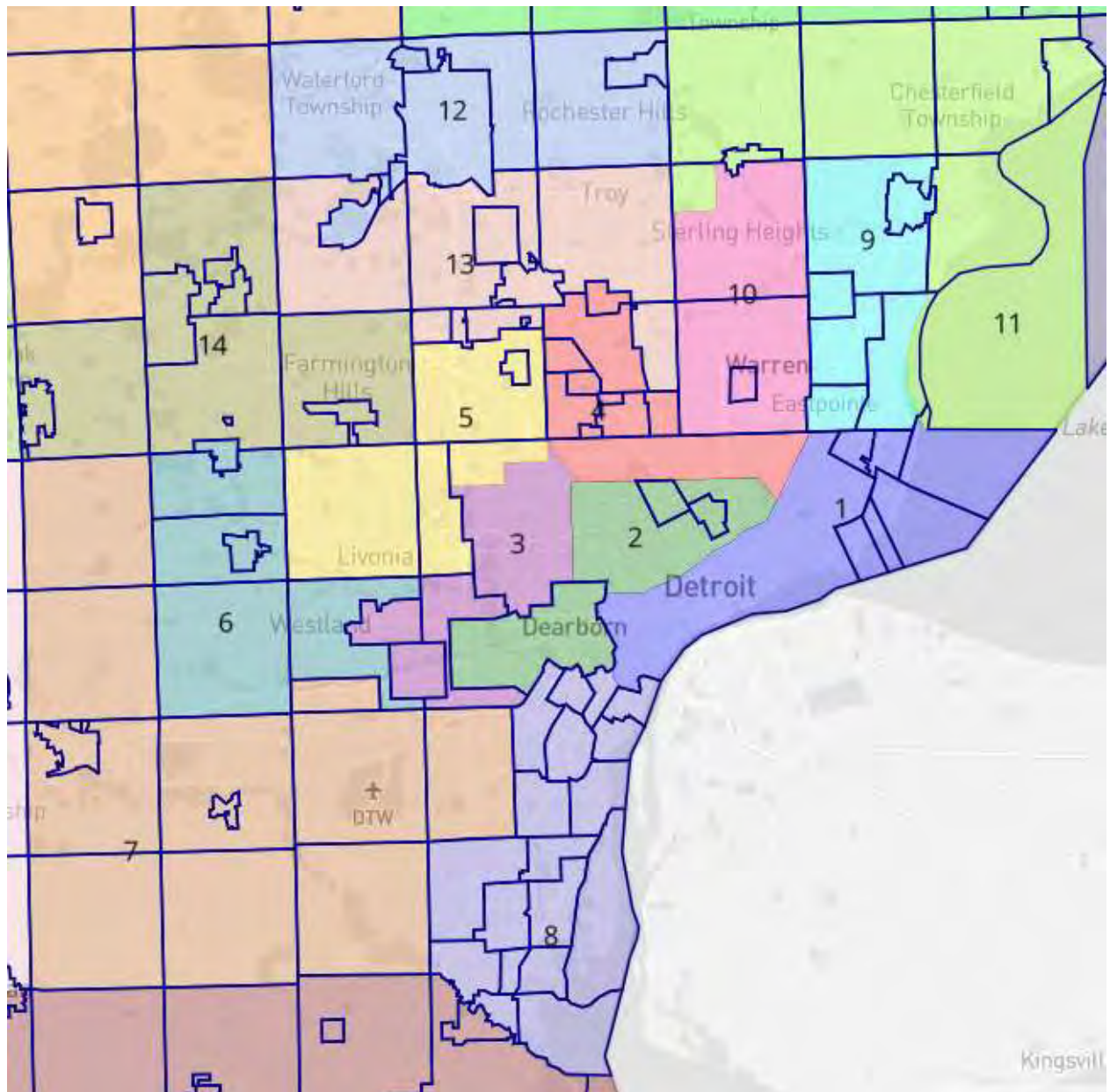


Metro Detroit

Overview map without municipal boundaries



Overview map with municipal boundaries



Districts 1 through 14 are located in the core urban and suburban portions of Metro Detroit: all of Wayne County along with southern Oakland and Macomb. One district extends into eastern Washtenaw.

Detroit-based districts: My first consideration was how to maintain five majority-minority districts that protect African-American voting rights in compliance with the VRA. With Detroit's continued population loss, I found it necessary to extend these districts across 8 Mile into Southfield and Oak Park to find sufficient African-American population.

- District 1 includes Harper Woods and the Grosse Pointes along with southern, downtown, and eastern Detroit. This district is connected along major arterials like the Ford Freeway and Jefferson Avenue.
- District 2 is Dearborn, Highland Park, Hamtramck, and central Detroit. This district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 3 joins western Detroit with Dearborn Heights, Garden City, and Inkster. Again, this district is two distinct but adjacent communities of interest joined for VRA purposes.
- District 4 consists of northern Detroit and the many small cities between Southfield and Warren. The heart of this district is the Woodward corridor between Highland Park and Birmingham.
- District 5 is a suburban-focused district connecting Southfield, Livonia, Redford, and a small portion of far northwestern Detroit.

None of these districts split a municipality other than Detroit. Divisions in Detroit are generally along major roads. For example, the major boundaries between District 1 and 2 is Gratiot, between District 2 and 3 is Schaeffer Highway, and between District 2 and 4 is McNichols. Using major roads as boundaries within cities improves the public's capacity to understand the districts' layout.

They are all safe Democratic districts. As majority-minority districts designed to protect African-American voting rights, they are all highly likely to elect African American Democrats.

Wayne-based districts: The remaining Wayne County districts look to protect communities of interest while keeping in mind statewide partisan proportionality.

- District 6 takes in Northville, Plymouth, Canton, and Westland. It is connected along major arterials like Ford Road and I-275.
- District 7 is located in southwestern Wayne County and eastern Washtenaw. It is centered around the I-94 corridor and has a significant African American population.
- District 8 is a Downriver district. Public comment was overwhelmingly in favor of recognizing this community of interest where possible. It is connected along I-75 and Fort St (M-85).

I would particularly like to highlight District 7. Because it straddles the Wayne/Washtenaw border, I think the commission might otherwise miss this potential district. I believe that the I-94 corridor is a very real community of interest in terms of commuter and commercial flows. It brings together an aviation industrial interest by connecting Detroit Metro and Willow Run airports. Further, its population is about one-quarter African American, which makes it likely that African Americans would have a plurality of the Democratic primary vote in this district. This district would create a strong opportunity for African American representation outside of the city of Detroit.

None of these districts split a municipality other than Detroit, which is split along a major geographical feature.

District 6 would be strongly Democratic, District 7 safe Democratic, and District 8 competitive with a Democratic lean.

Macomb-based Districts: I drew three districts in the southern half of Macomb.

- District 9 consists of St. Clair Shores, Eastpointe, Roseville, Fraser, Clinton Twp, and Mount Clemens. This district is built around the Gratiot corridor as a community of interest.
- District 10 consists of Warren, Center Line, and most of Sterling Heights. This district is built around Mound and Van Dyke as arterial connectors.
- District 11 pulls together the outer band of rapidly growing suburbs: Harrison, Chesterfield Twp, New Baltimore, Macomb Twp, Shelby Twp, Utica, and a part of Sterling Heights for population equality.

These districts contain no county splits and one municipal split in Sterling Heights. The choice of which portion of Sterling Heights is attached to District 11 could easily be changed if the commission's community of interest testimony persuades it otherwise. My selected portion is north of 18 Mile and west of Mound Rd. I selected it to improve statewide proportionality.

I made the decision to run Districts 9 and 10 vertically instead of horizontally to 1) better follow the transportation arterials running north out of Detroit and 2) improve statewide proportionality.

District 9 is competitive with a Democratic lean, District 10 highly competitive, and District 11 strongly Republican.

Oakland-based Districts: I drew an additional three districts in southern and eastern Oakland.

- District 12 runs along M-59 in central Oakland, connecting Rochester/Rochester Hills, Auburn Hills, Pontiac, and Waterford Twp (along with some smaller adjacent communities.)
- District 13 combines the next line of cities to the south: Madison Heights, Troy, Bloomfield, Bloomfield Hills, Birmingham and West Bloomfield (along with the smaller communities just north of Southfield.) On its east side, it connected along the Chrysler Freeway. In the center, it includes a stretch of the Woodward corridor. I would guess that this district would have the highest average household income in the state.
- District 14 pulls together the southwestern portion of the county - Farmington/Farmington Hills, Novi, South Lyon/Lyon Twp, and Wixom/Walled Lake/Commerce Twp. This district is built around I-96/696 and the Grand River corridor.

These districts contain no county or municipal splits.

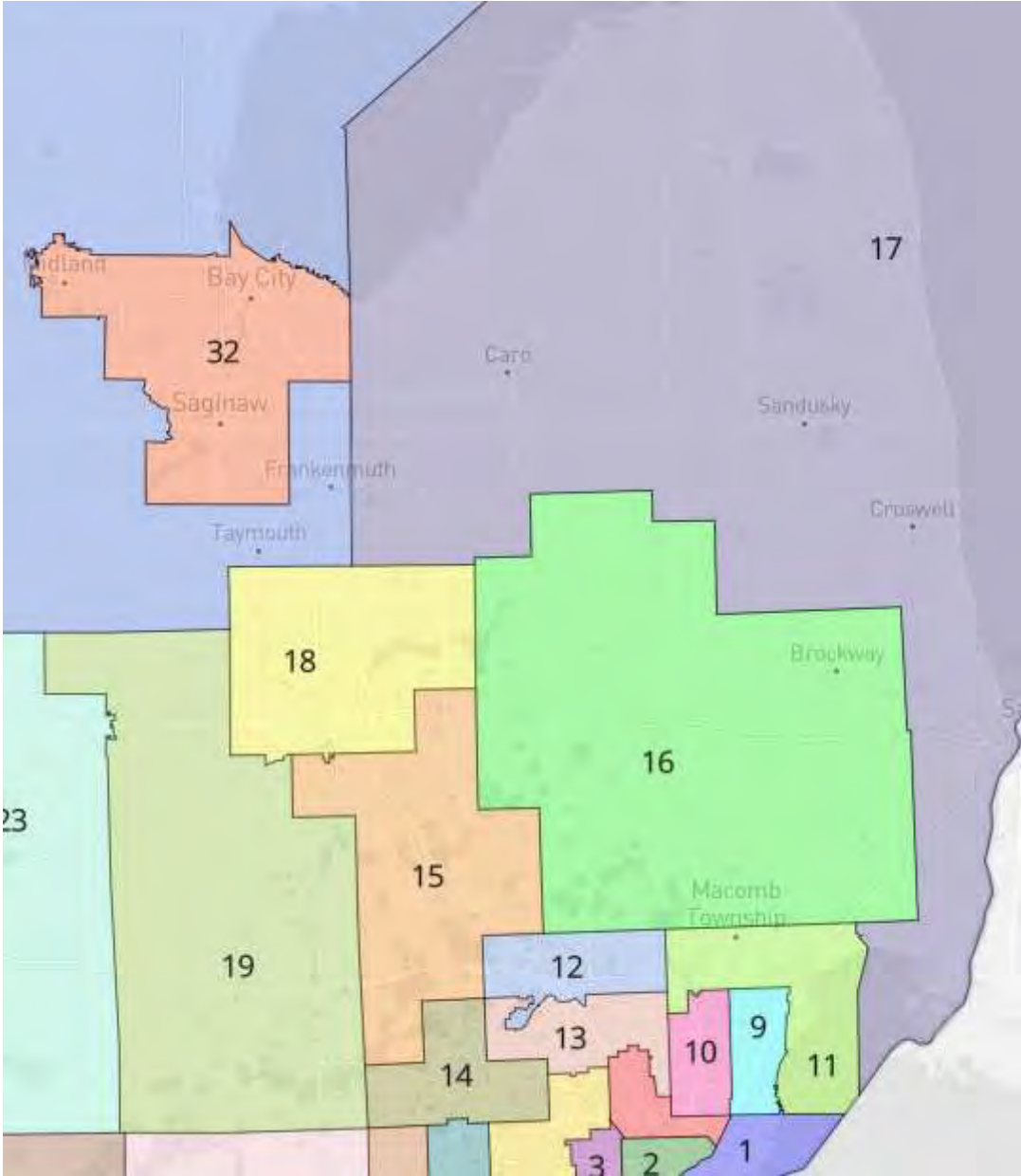
All three districts would be competitive with a Democratic lean.

Some additional notes on county and/or municipal splits in the Detroit region before moving on:

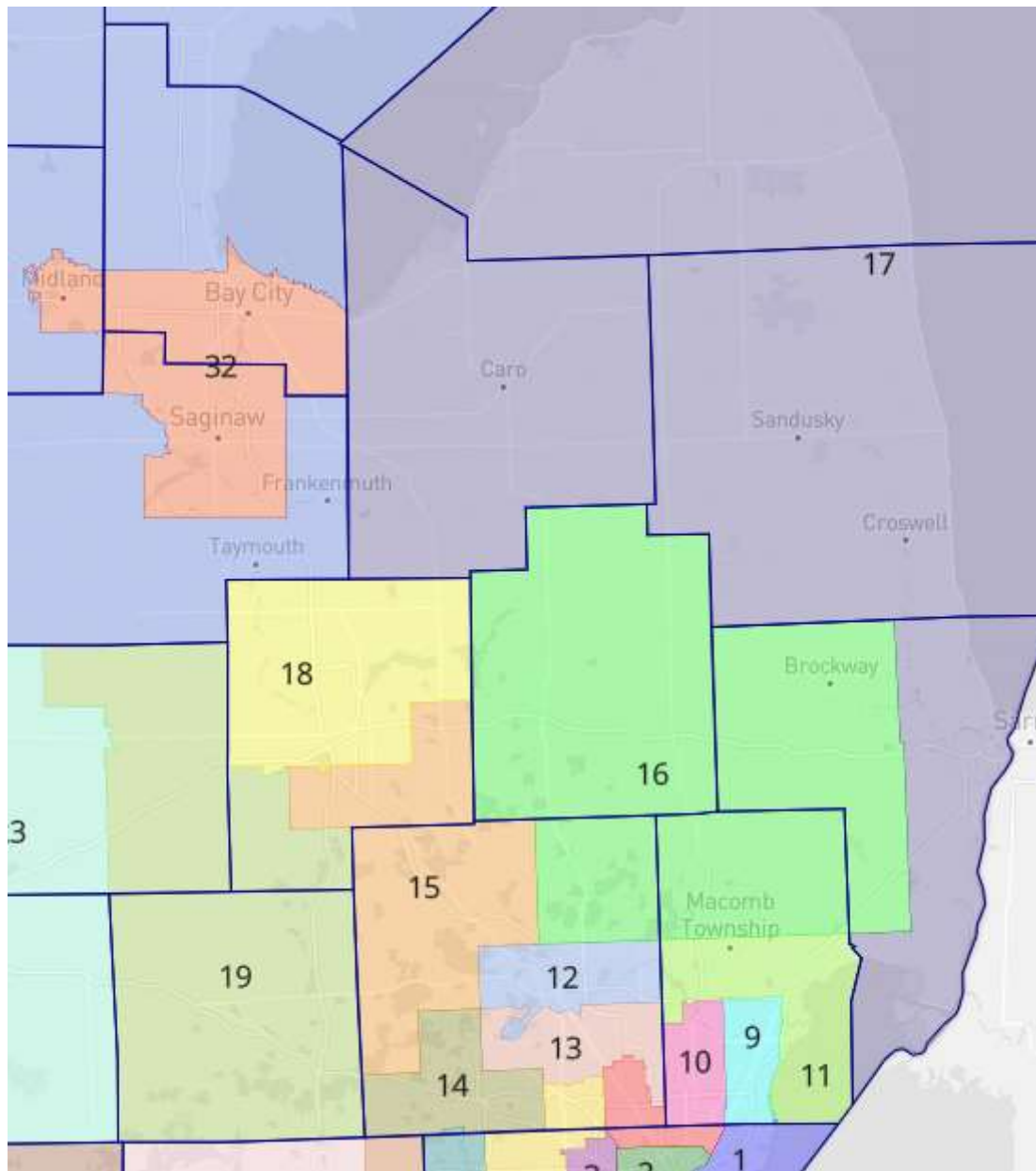
- District 1 includes all of Grosse Pointe Shores, including the Oakland County portion. That portion has a tiny population and could easily be moved to District 9 to split the municipality instead of the county, if desired.
- District 6 includes all of Northville, including the Oakland County portion. Although that portion contains several thousand people, it could be moved to District 14 to split the municipality instead of the county while both districts stay within legal population equality limits, if desired.
- District 8 includes a small portion of southern Detroit, specifically the areas south of the Rouge River. That portion is home to about 6,500 people. District 8 would still be within legal population equality limits without it, but boundaries inside Detroit would need to change as District 1 would go over population limits if it absorbed the area. Keeping it in District 8 preserves a small community of interest between African American residents of Ecorse, River Rouge, and that small slice of southern Detroit.

East Michigan

Overview map without county boundaries



Overview map with county boundaries



District 15 through District 18 are located in East Michigan - Genesee, northern and western Oakland, northern Macomb, and the Thumb.

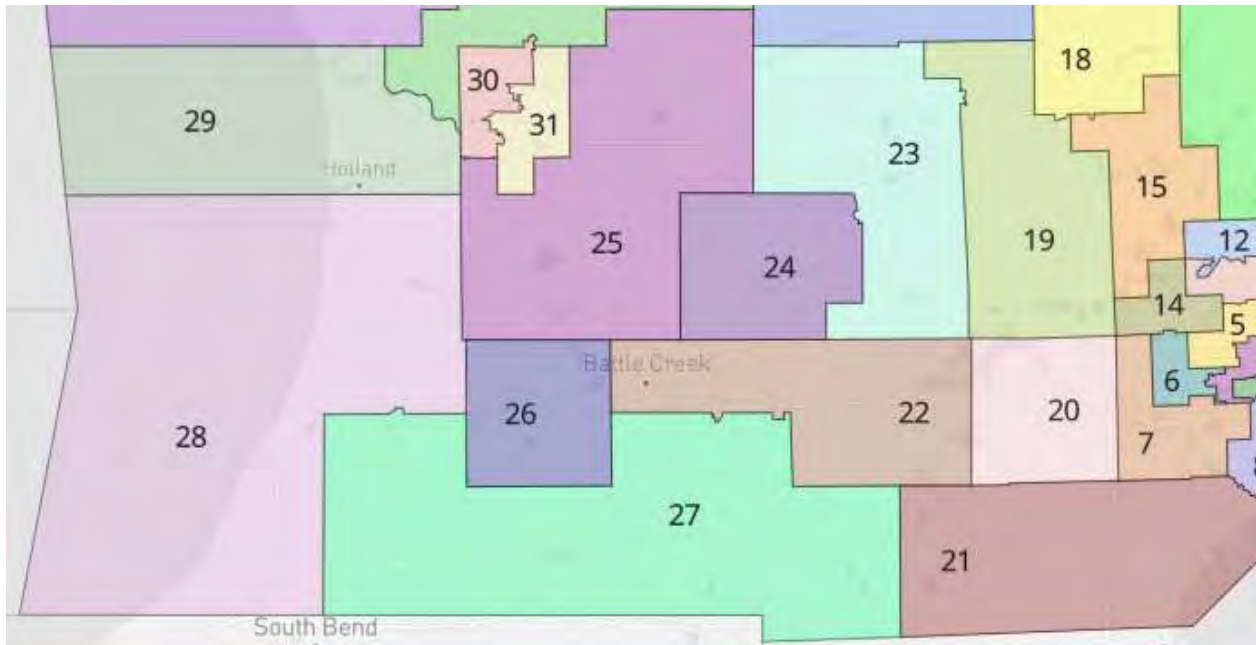
- District 15 is built around the I-75 corridor between Pontiac and Flint.
- District 16 pulls together exurban and rural areas anchored by Lapeer, combined with northeastern Oakland, northern Macomb, and western St. Clair
- District 17 is a Thumb district with Tuscola, Huron, and Sanilac along with the eastern, coastal portions of St. Clair.
- District 18 is a compact northern Genesee district anchored in Flint.

There are no municipal splits among these districts.

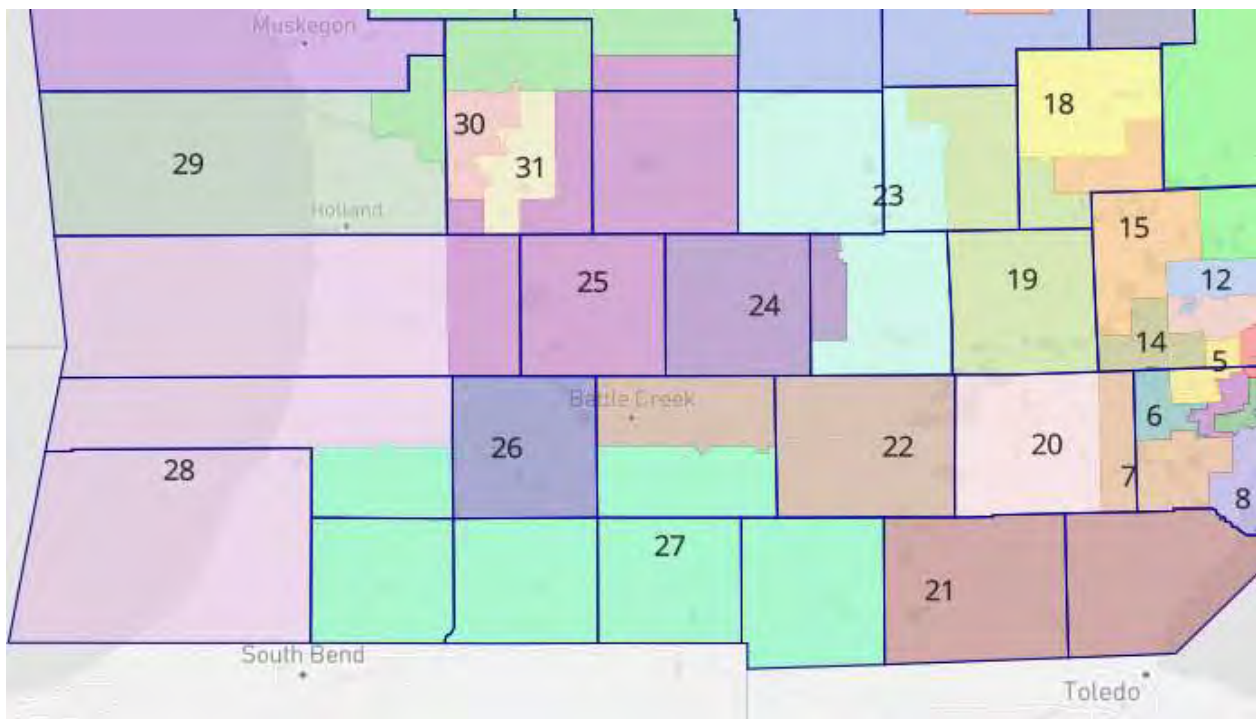
This is a heavily Republican section of the state. District 18 would be safe Democratic, and at about 30% African American, likely to elect an African American Democrat. District 15 which is strongly Republican and the other two safe Republican.

Southern, Central and Western Michigan

Overview map without county boundaries



Overview map with county boundaries



Central/South Michigan - Districts 19 through 24 are located in the greater Lansing and Ann Arbor areas. They cover all of Monroe, Lenawee, Livingston, Shiawassee, Clinton, Eaton, Ingham, and Jackson Counties; most of Washtenaw and Calhoun Counties; and part of Genesee County.

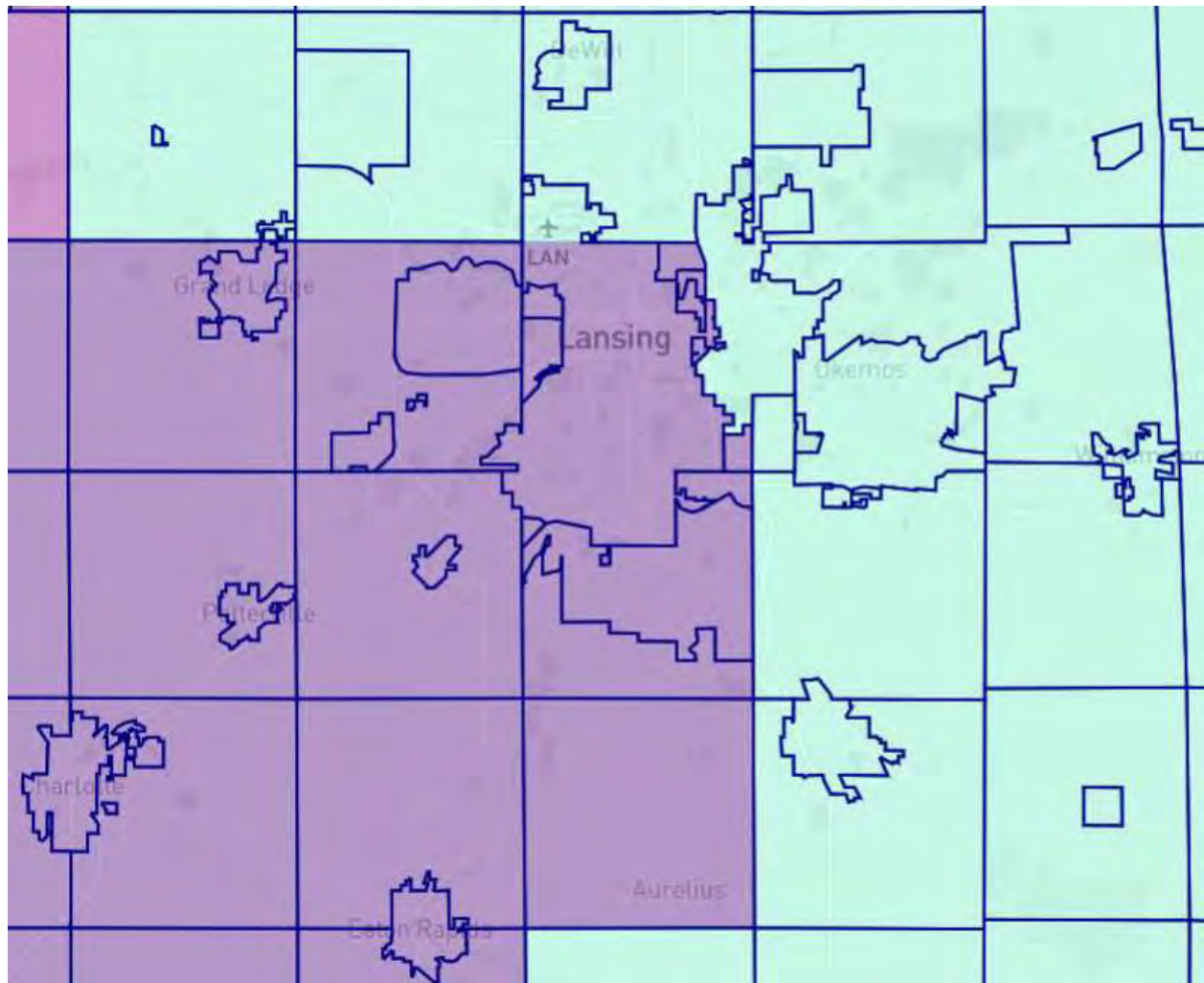
- District 19 is a suburban/exurban seat in the middle of Detroit, Flint, and Lansing. It combines all of Livingston County with southern Genesee and eastern Shiawassee.
- District 20 is a compact Washtenaw seat, anchored by Ann Arbor and containing its western bedroom communities.
- District 21 links Lenawee and Monroe, the two southeasternmost counties of the state.
- District 22 combines Jackson with northern Calhoun as a I-94/Michigan Ave corridor community of interest.
- District 23 is one of two Lansing area districts. This one combines Clinton, western Shiawassee, and most of Ingham.
- District 24 is the other Lansing seat. It combines Lansing proper with Eaton.

These six districts contain four county splits in Ingham, Shiawassee, Genesee, and Calhoun. These splits are due to population equalization -- these are all relatively large counties that would be difficult to recombine into fewer splits, especially while keeping the commission's other priorities in mind. They contain no municipal splits that aren't explained by enclaves or county boundaries.

Districts 20 and 21 are fairly self-explanatory, I think. District 22 pulls together the small industrial cities and towns along I-94/Michigan Ave and separates those small urban areas from the rural areas to their south. The Lansing area is roughly large enough for two districts. Splitting it into two districts that both contain urban cores is necessary for statewide proportionality to avoid advantaging the Republican party. Livingston is large enough to anchor its own district in District 19, and taking in southern Genesee follows a community of interest along US-23. Shiawassee County is split between Districts 19 and 23 largely for population equality as opposed to any other interest.

These six districts are split in party preference. Districts 19 and 21 are strongly Republican, while District 22 is competitive with a Republican lean. District 20 is safe Democratic, District 24 strongly Democratic, and District 23 competitive with a Democratic lean.

Close-up of the Lansing area with municipal boundaries



West/South Michigan - Districts 25 through 31 are located in the greater Grand Rapids and Kalamazoo areas. They cover all of Hillsdale, Branch, St. Joseph, Cass, Berrien, Van Buren, Kalamazoo, Allegan, Barry, and Ionia Counties; most of Ottawa and Kent Counties; and part of Calhoun and Montcalm Counties.

- District 25 is a district for Grand Rapids' eastern and southern suburbs and exurbs. It contains all of Barry and Ionia and parts of Kent, Allegan, and Montcalm.
- District 26 is a compact Kalamazoo seat, containing all of Kalamazoo County.
- District 27 pulls together the southern rural counties of Hillsdale, Cass, St. Joseph, and Branch with the southern halves of Calhoun and Van Buren. US-12 is a major arterial for this district.
- District 28 lies along the Lake Michigan coast south of Holland, containing Berrien, northern Van Buren, and most of Allegan.

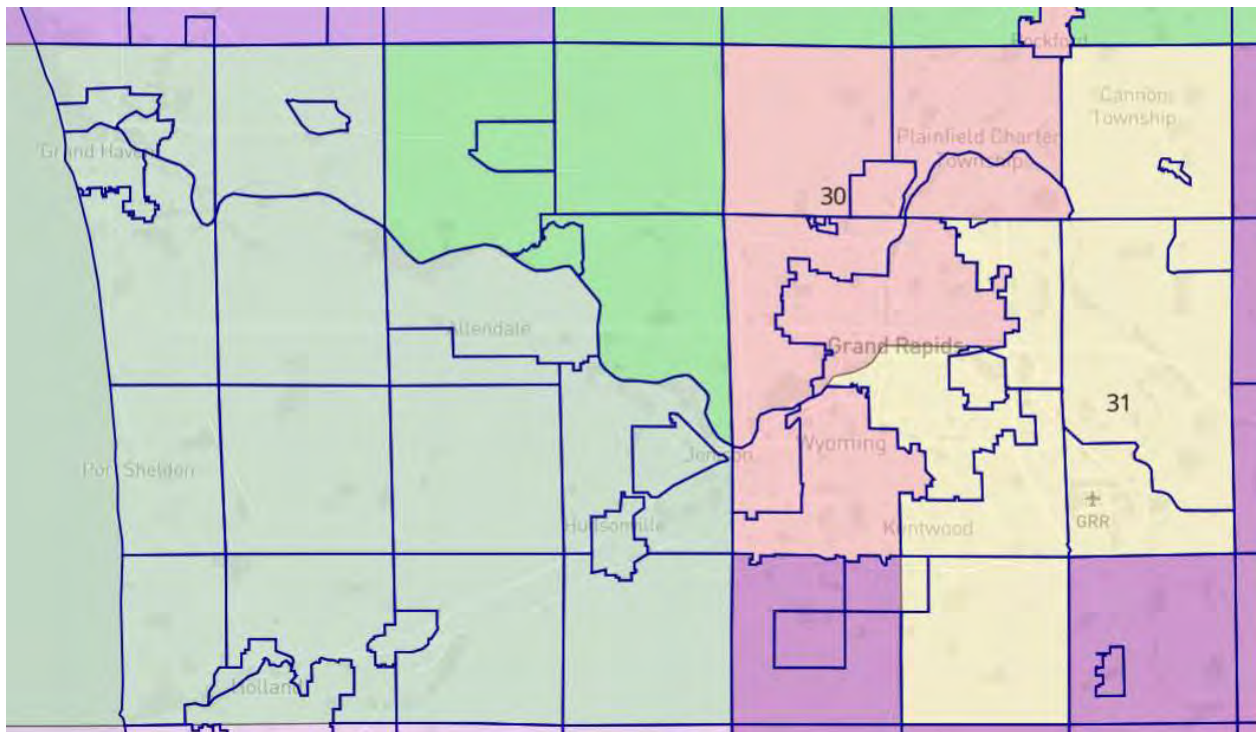
- District 29 is a compact Ottawa seat. Ottawa is too large for a single district, so far northeastern Ottawa is placed in District 34
- District 30 is one of two Grand Rapids-based seats, containing the western and northern portions of the “Six Cities” and extending into surrounding townships.
- District 31 is the other Grand Rapids-based seat, containing the eastern and southern portions of the “Six Cities” and extending into surrounding townships.

These seven districts contain six counties that are split between them, which are required for population equality. The city of Grand Rapids is the only municipality split, which is necessary for statewide proportionality. The split follows Fulton St and the Grand River. Splitting Grand Rapids itself allows it to anchor two districts with its suburban neighbors. Failure to split Grand Rapids packs urban voters and unfairly advantages the Republican party.

District 26 pretty much draws itself as a compact Kalamazoo seat. District 27 takes in the four rural counties to the south, along with the southern half of Calhoun that didn't fit into District 22 and enough of Van Buren for population equality. The shoreline District 28 takes in Berrien, the remainder of Van Buren, and most of Allegan for population equality. District 29 is most of Ottawa County - portions north and east of the Grand are excluded for population equality. Districts 30 and 31 take in the core portions of metro Grand Rapids in Kent County. District 25 is then Barry and Ionia combined with the remainder of Allegan, the remainder of southern and eastern Kent, and the southern tier of townships from Montcalm for population equality.

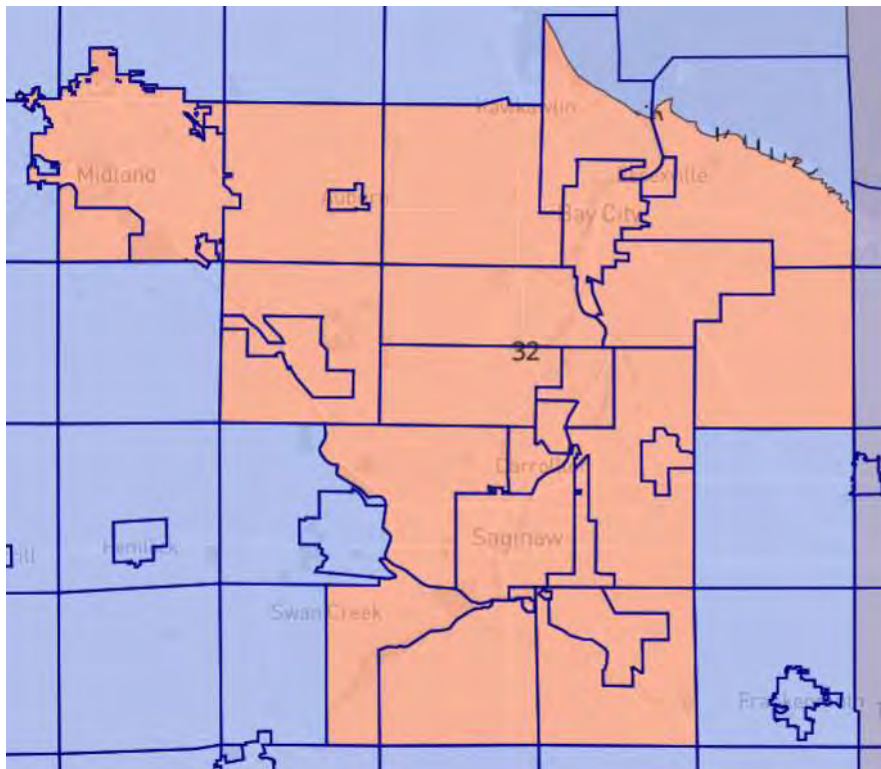
This region of the state favors Republicans, which is shown in the districts' partisan preferences. Districts 25, 27 and 29 are safe Republican; while District 28 is strongly Republican. Districts 26 and 31 are strongly Democratic. District 30 would be highly competitive.

Close-up of Kent and Ottawa with municipal boundaries



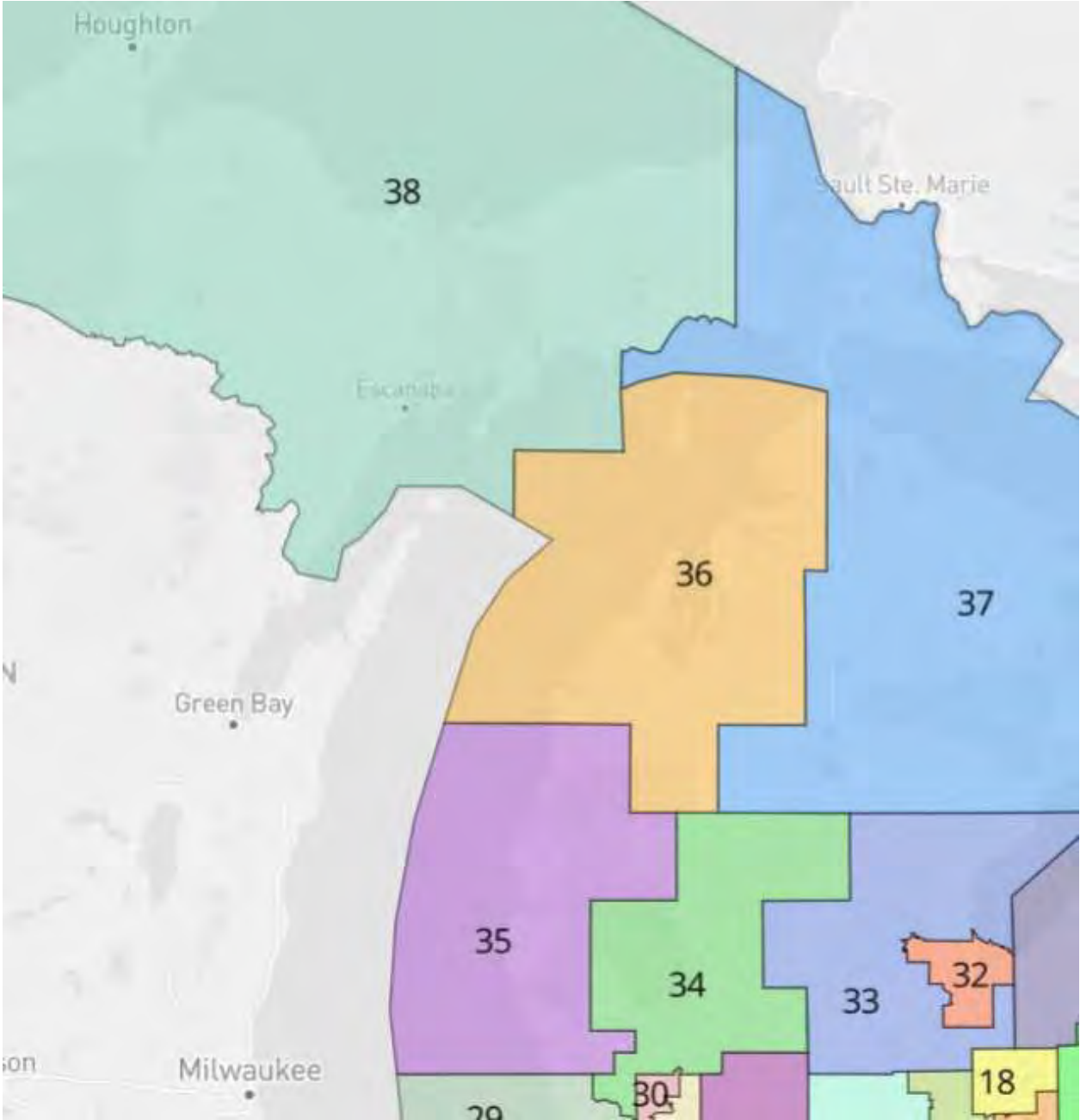
Note that the Cutlerville area south of Wyoming/Kentwood that appears to be split is a Census-designated place, not a true municipality

Close-up of the Tri-Cities Area with municipal boundaries

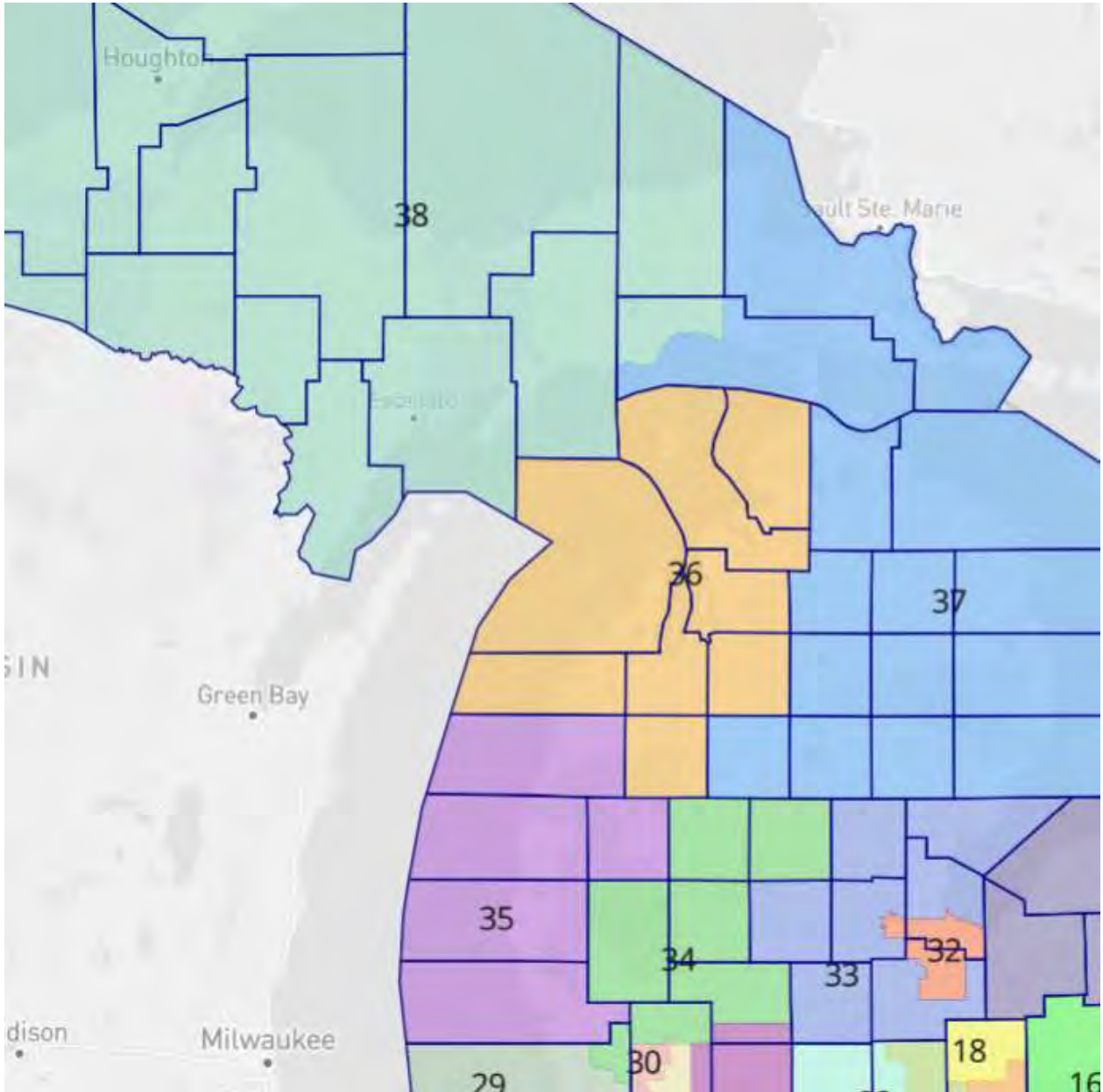


Northern Michigan

Overview map without county boundaries



Overview map with county boundaries



The remaining districts (32 through 38) are in northern Michigan - defined roughly as Muskegon, Newaygo, Montcalm, Gratiot, and Saginaw Counties; along with all counties north of them.

- District 32 is a compact Tri-Cities district, both in response to public comment to protect that community of interest and for statewide partisan proportionality.
- District 33 takes in the remainder of Saginaw, Bay, and Midland Counties, along with Arenac, Gladwin, Isabella, and Gratiot Counties. This creates a rural and small town community of interest district in east central Michigan to complement District 32's urban and suburban district.
- District 34 takes in the remainder of Kent, Ottawa, and Montcalm Counties and combines them with the interior counties to their north: Newaygo, Mecosta, Oceola, and Clare. This follows the M37 and US131 arterials going north from Grand Rapids.
- District 35 is a shoreline community of interest district with Muskegon, Oceana, Mason, and Manistee Counties. It also includes Lake County for population equality.
- District 36 is a community of interest district for Greater Traverse City. It includes Emmet, Charlevoix, Antrim, Kalkaska, Wexford, Grand Traverse, Leelanau, and Benzie.
- District 37 is 37's counterpart on the Lake Huron side, containing Missaukee, Roscommon, Ogemaw, Iosco, Alcona, Oscoda, Crawford, Otsego, Montmorency, Alpena, Presque Isle and Cheboygan Counties. For population equality, it crosses the Straights to take most of Mackinac and all of Chippewa.
- District 38 is the remainder of Mackinac and the remaining Upper Peninsula counties: Luce, Schoolcraft, Alger, Delta, Menominee, Dickinson, Marquette, Iron, Baraga, Houghton, Keweenaw, Ontonagon, and Gogebic.

These seven districts contain seven counties that are split, mostly in Districts 32 through 34. Districts 35 and 36 require no county splits, while District 38 requires a split of Mackinac or Chippewa for population equality.

District 34 splits come from taking in the portion of counties leftover in districts to its south and won't be rehashed.

Districts 32 and 33 split Saginaw, Bay, and Midland Counties between them. This is necessary both to protect the Tri-Cities community of interest and for statewide proportionality. District 32, as a compact urban seat across three counties, is specifically the kind of district that the Fair Districts amendment supports by deprioritizing boundary splits in favor of communities of interest and proportionality.

This area is mostly split between competitive districts and those that favor Republicans. Districts 32 and 35 are highly competitive, while District 38 is competitive with a Republican lean. Districts 33 and 36 are strongly Republican, while the remaining two are safe Republican.

Conclusion

The presented plan demonstrates that it is possible to adhere to the Constitutional priorities of equality of population and fidelity to federal law, contiguity, and preserving communities of interest, while also maximizing partisan proportionality. I hope that it will serve as a useful model for the commissioners as they seek to implement their Constitutional mandate. I thank the commissioners for their consideration.



MUSKEGON RIVER WATERSHED ASSEMBLY (MRWA)

@ Ferris State University
1009 Campus Drive, JOH 200
Big Rapids, MI 49307-2280
Phone: (231) 591-2324 Fax: (231) 591-2306
E-mail: mrwa@ferris.edu Website: www.mrwa.org

September 7, 2021

Dear Independent Citizens Redistricting Commission,

This public comment is written in support of Newaygo County and Muskegon County being considered as communities of interest because of their shared natural resources, and the impact that outdoor tourism has on the economies of both counties.

The Muskegon River is a critical natural resource that flows southwesterly through Newaygo and Muskegon counties, and the river eventually empties into Muskegon Lake. The Muskegon River supports educational, scientific, and conservation initiatives. The residents of both Muskegon County and Newaygo County are impacted both culturally and economically by the preservation, protection, restoration, and sustainable use of the Muskegon River.

The Muskegon River supports a variety of outdoor activities that contribute to the economy of both counties. The Muskegon River is Michigan's second largest river, and there has been a large increase in tourism from kayakers and canoers paddling the river. The river also is home to several shoreline parks, campgrounds, cabins and inns that attract outdoor enthusiasts from across the state.

The Muskegon State Game Area is an 8,411-acre section of land which overlays the Muskegon River, and spans both Muskegon and Newaygo counties. There is an abundance of wildlife in the area, including otters, waterfowl, and white-tailed deer. Hunting is popular in the forested areas of the state game area and hunting also contributes to the economies of Newaygo and Muskegon counties.

I urge the Independent Citizens Redistricting Commission to consider the shared economic and environmental interests of Newaygo and Muskegon counties when considering new district maps. I believe it is vital that the commission maintain the shared interests of these counties, so the residents of these counties are properly represented in the Michigan Legislature.

Best regards,

A handwritten signature in black ink, appearing to read "George K. Heartwell", written over a horizontal line.

George K. Heartwell
MRWA Board Member
Mayor of Grand Rapids (2004-2015)
Cell: (616) 443-2193
gkheartwell@gmail.com

Greater Washtenaw County Local Foodshed

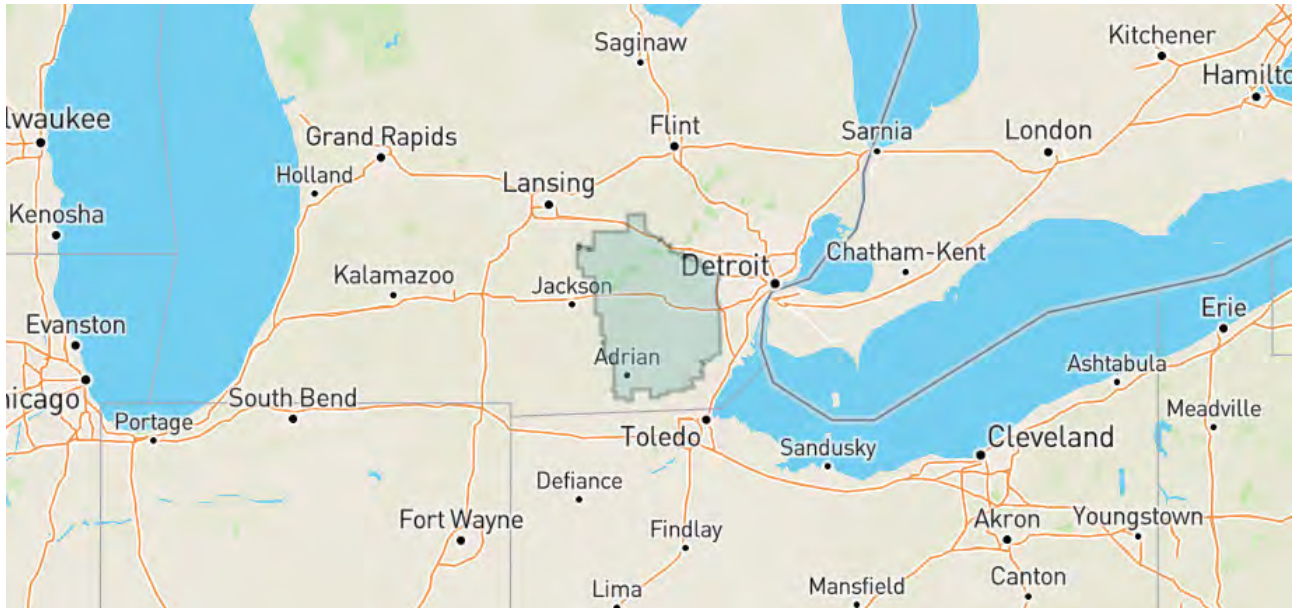
This map was created at [Representable.org](https://www.representable.org)

View this community at:

<https://www.representable.org/submission/fec49f32-f0cc-4574-a6ae-5b0b19b154c0>

Organization: Washtenaw County Food Policy Council

Community Mapping Drive: Greater Washtenaw County Local Foodshed



Community Information



DALTON TOWNSHIP FIRE DEPARTMENT

Alan R. Styles, Fire Chief

September 1, 2021

Dear Independent Citizens Redistricting Commission,

This public comment is written in support of Newaygo County and Muskegon County being considered as communities of interest because of the shared work that first responders provide to both communities.

Rural fire departments are often the first line of defense when dealing with emergencies in rural communities. Unfortunately, rural fire departments in both counties also face limited funding and typically lack the resources for training and new equipment. To combat limited funding and resources, rural fire departments in Newaygo and Muskegon counties will often work together and share resources across township and county lines to aid other fire departments in need.

As an educator for the Michigan Fire Service, I am often in Newaygo and Muskegon Counties rural area and the demographics and mutual aid are very similar and having the same legislator tends to help when there are issues that affect the fire service.

The collaborative efforts of rural fire departments have been important to the success of first responders across both counties. The rural communities in both Newaygo and Muskegon counties are culturally very similar, and residents often face similar problems which has led to increased collaborative efforts among first responders.

I urge the Independent Citizens Redistricting Commission to consider the shared interests of Newaygo and Muskegon counties when considering new district maps, including the positive impact that first responders have made across both counties. I believe it is vital that the commission maintain the shared interests of these counties, so the residents of these counties are properly represented in the Michigan Legislature.

Yours in education and safety,

A handwritten signature in black ink, appearing to read "Alan R. Styles", is written over a horizontal line.

Alan R. Styles, Fire Chief

Duty is Doing it, Pride is Wearing it, and Tradition is Living it

MI 92nd State House

Muskegon Heights

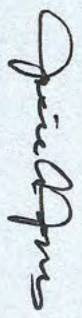
● Black Pop. 78.3%
(2010 Census)

City of Muskegon

● Black Pop. 34.5%
(2010 Census)

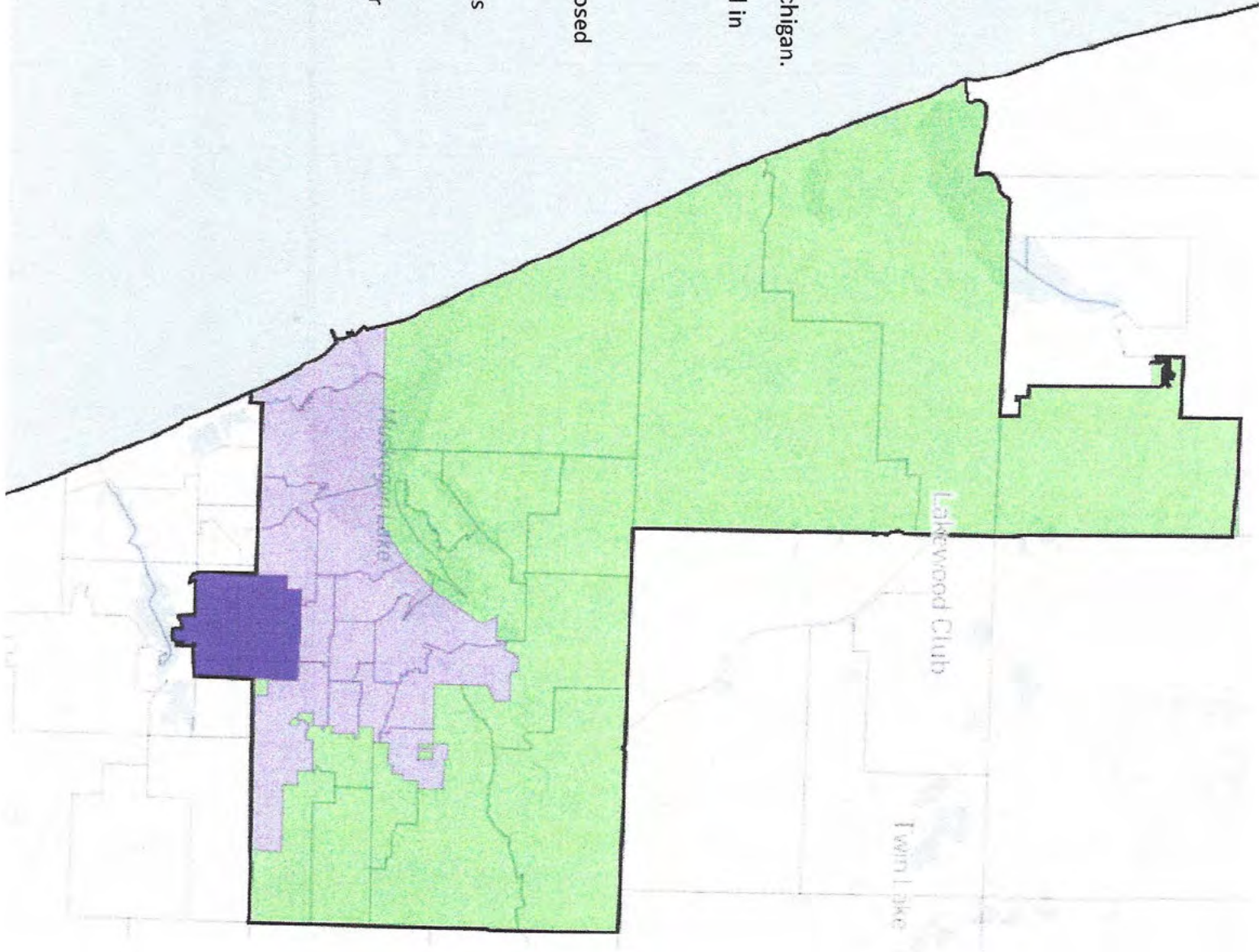
The Cities of Muskegon and Muskegon Heights are home to the largest population of African Americans in West Michigan. These cities are contiguous and should never be separated in accordance with Sec. 2 of the Voting Rights Act of 1965, which States: "No voting qualification or prerequisite to voting, or standard, practice, or procedure shall be imposed or applied by any State or political subdivision to deny or abridge the right of any citizen of the United States to vote on account of race or color." Any attempt to redistrict Muskegon Heights will diminish the voting power of the African Americans in West Michigan.

Thank you.



Josie James

Muskegon, MI 49441



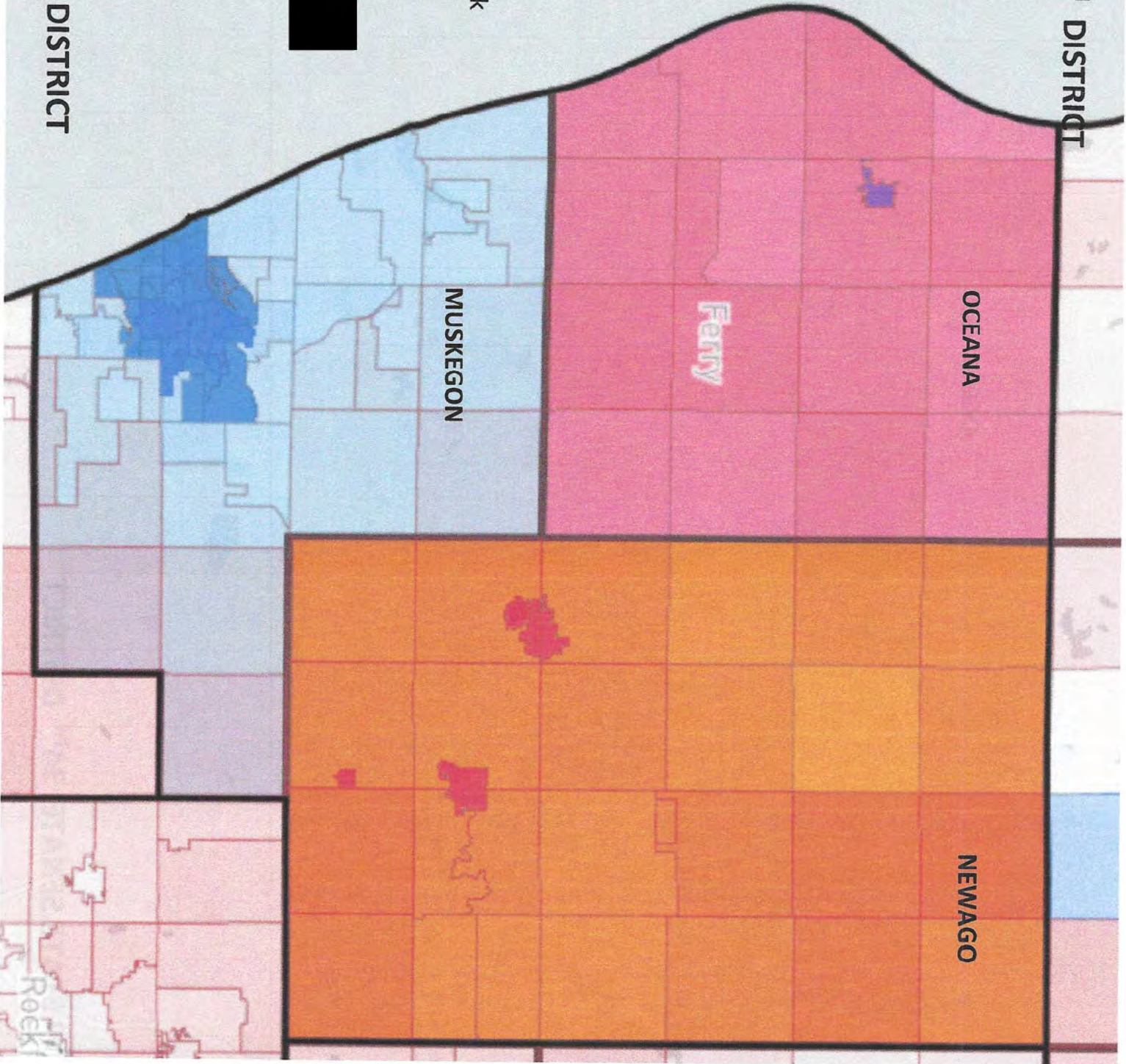
MI STATE SENATE 34TH DISTRICT

Newago County should not be part of the

34th District because:

1. Does not share Community of Interest with Muskegon and Oceana.
2. Lake Michigan coast- Line is a common interest for those living on that coast; Muskegon and Oceana.
3. Muskegon and Muskegon Heights are the largest Black Cities in West MI and surrounding rural areas overwhelm it's interests.

Josie James



MI STATE SENATE 34TH DISTRICT

City of Grosse Pointe Woods

CERTIFIED RESOLUTION

Motion by Granger, seconded by McConaghy, regarding **Decennial Redistricting**, that the Council adopt the following resolution:

WHEREAS, the U.S. Constitution calls for a decennial Census of the population of the country and a reapportionment of representatives to the U. S. House of Representatives; and

WHEREAS, upon completion of the Census every 10 years, states are required to approve new districts for the U.S. House of Representatives as well as state office districts for state representatives and state senators; and

WHEREAS, the citizens of the State of Michigan have established a Redistricting Commission to undertake the development and approval of redistricting plans based on the 2020 Census, and to take effect starting in 2022; and

WHEREAS, the U.S. Supreme Court and the Michigan Constitution have established principles that the redistricting process must meet; and

WHEREAS, redistricting plans are required to follow principles of being compact, contiguous, respecting borders of municipalities and natural geographic features, respecting minority voter rights to representation, and keeping communities with similar interests together; and

WHEREAS, the six small municipalities consisting of the Grosse Pointes and Harper Woods comprise all of the suburban communities of the northeastern corner of Wayne County and a tiny part of Macomb County; and

WHEREAS, the citizens of all of the Grosse Pointes and Harper Woods have lived for decades as one community sharing a multitude of services including one public school system serving all of the Grosse Pointes and a portion of Harper Woods, shared mutual aid for police and fire, and many other services and expenses forming a single community of interest; and

WHEREAS, the redistricting plan in place for the last decade divided this community of interest into two districts: State District 1 consisting of Grosse Pointe Shores, Grosse Pointe Woods, Harper Woods, and a portion of Detroit, and State District 2 consisting of Grosse Pointe Farms, Grosse Pointe City, Grosse Pointe Park, and a portion of Detroit, two State Senate districts, and a Congressional district stretching in convoluted fashion all the way to Pontiac, an Oakland County community, creating a three-county wide stretch; and

WHEREAS, the City of Grosse Pointe Woods passed a Resolution on July 11, 2011, in opposition to the division of the Grosse Pointes and Harper Woods into multiple legislative districts which proved to not respect the long-established redistricting principle of drawing elected representatives' district boundaries to respect communities of interest; and

WHEREAS, redistricting should allow a long-time combined community, its residents, businesses, infrastructure, and the community as a whole, to be represented together to have an effective and unified voice in Lansing and Washington, D.C.

NOW, THEREFORE, BE IT RESOLVED, the City of Grosse Pointe Woods requests the Michigan Redistricting Commission approve the redistricting plan keeping Grosse Pointe Woods, Grosse Pointe, Grosse Pointe Farms, Grosse Pointe Shores, Grosse Pointe Park, and Harper Woods in the same state and federal legislative districts, and that a copy of this resolution be immediately provided to the members of the Michigan Redistricting Commission for their consideration.