



Lessons Learned from the Michigan Independent Citizens Redistricting Commission (MICRC)

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Background

In 2018, Michigan voters approved a constitutional amendment via statewide ballot initiative that shifted the responsibility for drawing Michigan’s congressional and state legislative districts from the Michigan Legislature to a newly-formed Michigan Independent Citizens Redistricting Commission. This marked a new approach to redistricting in the state, maximizing public input and for the first time in Michigan, and incorporating communities of interest (COIs) as a criterion in map drawing. Beginning in 2020, the bipartisan commission solicited public comments before drawing Michigan’s new districts.

The Commission adopted its first set of maps in December 2021, which were used in the 2022 elections. However, on December 21, 2023, a federal court ordered the Commission to redraw 13 Detroit-area districts in the Michigan House and Senate maps, after finding they used race as a predominant factor while redistricting, which violates the equal protection clause in the 14th Amendment to the U.S. Constitution.

Prior to beginning the remedial phase of the remapping effort, three commissioners stepped down from their positions, two Democrats and one Republican. In their place, three new commissioners were chosen via the state’s random selection process: Commissioner Elaine Andrade (D), Commissioner Donna Callaghan (D), and Commissioner Marcus Muldoon (R).

House Remapping

Beginning in January 2024, the Commission met to redraw seven State House districts (1, 7, 8, 10, 11, 12, and 14) according to the court’s instruction. Across a series of meetings, the Commission drew numerous draft maps and received extensive public comment throughout the process including via the Commission’s online portals and at regular map drawing sessions, as well as at Town Halls and Public Hearings in February specifically held for eliciting feedback. After voting on 10 drafted maps, the final agreed upon map, “Motown Sound FC E1,” received bipartisan support from 10 of the 13 commissioners after two rounds of voting. The Commission

submitted this remedial State House plan to the court by its March 1, 2024, deadline, and the new State House map was approved by the court on March 27, 2024.

Senate Remapping

The Commission was ordered to redraw six State Senate districts (1, 3, 6, 8, 10, and 11) in the metro Detroit area. Beginning in April 2024, the Commission held several meetings where they drew maps together. Additionally, they held six public hearings where the Commission listened to live public comments. The public was also able to submit public comments through an online portal as well as a mapping portal. As part of this process, the Commission sought help from the University of Michigan's Center for Local, State, and Urban Policy (CLOSUP) for managing, analyzing, and reporting on the public input, leading to the creation of a unified database of public comments for the first time. In total, the Commission received 1,680 public comments regarding the draft Senate maps. Throughout the process, the Commission drafted 12 maps. Over the course of two days, the Commission voted on the 12 proposed maps. After five unsuccessful voting rounds to secure the support required to send a map to the court, the Commission transitioned to ranked-choice voting. In the end, the Commission approved the "Crane A1" map and submitted it to the District Court on June 27, 2024. The Federal court approved the new state Senate map on July 26, 2024.

This report serves as documentation of the lessons learned in the remedial phases of the State House and Senate remapping process and is intended to help future citizen redistricting commissions in Michigan and other states to further improve upon citizen redistricting approaches.

Lessons Learned - MICRC Interviews

Upon finishing the remedial remapping for both the House and Senate districts, commissioners and staff were given the opportunity to provide feedback through structured interviews with CLOSUP. In total, 15 interviews were conducted. These interviews will be archived at the University of Michigan's Bentley Historical Library and will be accessible to all stakeholders interested in Michigan's new approach to redistricting. The following is a summary of the reflections and recommendations gathered from these interviews that covered a broad range of topics as outlined below, including the things they are most proud of, the training and resources provided to them, the Commission's organizational and leadership structure, public input and issues of COIs, the map drawing process, and more.

What MICRC Personnel are Most Proud of

Key findings:

- **Pride and Achievements:** Collaboratively created fair maps for Michigan despite challenges like COVID-19 and diverse backgrounds of commissioners.

- **Dedication to Democracy:** Played a key role in giving the public a voice in government, exceeding public comment expectations.
- **Rewarding Experience:** Impactful and rewarding process contributing to a fairer and more just redistricting process for Michigan.

Commissioners expressed immense pride in their achievements while serving on the Michigan Independent Citizens Redistricting Commission. They highlighted their success in creating effective and fair maps for Michigan, overcoming significant challenges such as the COVID-19 pandemic, diverse political backgrounds, and initial lack of redistricting knowledge. The collaborative effort among diverse and previously unacquainted members was a major point of pride, as commissioners felt they managed to work together, fostering collegial discussions and following constitutional guidelines to ensure the public's voice was heard and incorporated into the final maps. Many commissioners also felt a deep sense of satisfaction in completing their tasks and having the maps accepted by the courts, proving skeptics wrong and significantly improving Michigan's representation.

Additionally, commissioners took pride in their dedication to the democratic process and the important role they played in giving the public a voice in government. They successfully received over 30,000 public comments throughout the entire redistricting process that began in 2020, far exceeding expectations given Michigan's size, despite operating with limited finances and having to navigate funding challenges. Commissioners valued the team effort in maximizing partnerships with organizations across the state and believed strongly in the systemic impact of their work, fostering a sense of importance in allowing everyday Michigan residents to be heard. Overall, they saw their experience as a rewarding opportunity to serve the citizens of Michigan and to contribute to a fairer and more just redistricting process.

Training and Resources Provided to Commissioners

Key findings:

- **Training Seen as Valuable:** The provided training and hands-on practice were very useful and needed.
- **Request for More Training:** Additional technical and general training in-person would be beneficial.

The Commissioners received a large packet of reading materials and initial training sessions at the launch of the MICRC in fall, 2020, along with additional training sessions later in the process, from a variety of experts. Commissioners and staff generally found the training and resources provided valuable but identified areas for improvement. They appreciated the webinars, Zoom sessions, and continuous reminders which were helpful, but felt in-person training could have built more trust. Commissioners said that insights from Arizona and California citizen-commissioners from the 2010 redistricting process proved beneficial in setting

expectations, and the support from someone familiar with state government was crucial for navigating bureaucratic complexities of state government. Many also felt that comprehensive materials, recordings, and reports were useful, but some found the volume and timing overwhelming, suggesting that earlier and more concise training would have been beneficial.

Many felt that additional technical training, particularly on mapping, GIS tools, and public outreach would have enhanced their understanding. Repeated presentations and hands-on practice with experts and mapping software were highlighted as particularly valuable. Additionally, there were requests for more general training on sustainable group dynamics, addressing biases, and navigating political spaces. Overall, while most saw the training as largely adequate, there were suggestions for more in-depth, organized, and earlier training to better prepare future commissioners.

Commission Organization, Leadership, and Operations

Key findings:

- **Operational Efficiency Enhancements:** Suggestions to enhance administrative support, including additional state government experts, dedicated finance and procurement positions on the MICRC staff itself, and outsourcing specialized services.
- **Leadership Structure and Clarity:** Leadership was effective, but clearer role definitions and decision-making authority is needed; consider longer terms for strong leaders and ensure balanced committee structures.
- **Commitment to Transparency:** Transparency was strong, through recorded meetings and public decision-making, but emphasis on understanding and improving information management for public input.
- **Ethical Conduct and Integrity:** Ethical conduct was generally well managed, but a need for robust enforcement mechanisms to maintain integrity and accountability.

Commissioners and staff generally appreciated the support and resources provided to them but recognized opportunities for improvement. They identified that adding more administrative support, like part-time assistants or executive support, could help manage scheduling, coordination, meeting and event logistics, and improve work-life balance, as the very small staff was often overworked. Some suggested including staff with expertise in state government operations to navigate the complexities more efficiently. Additionally, some commissioners felt that procuring dedicated staff positions for finance and procurement would streamline operations and ensure better contract management and financial reporting. Outsourcing certain services, like legal counsel, to specialized consultants rather than having counsel on staff – and potentially having multiple legal representatives to present differing opinions – was also recommended for more nuanced advice.

Leadership within the Commission was largely viewed as effective, with the chair and vice-chair roles facilitating meetings well. However, some reported a need for clearer role definitions and

decision-making authority to ensure everyone understood their responsibilities. Most commissioners felt that the rotation of these positions every six months worked well, but some suggested the Commission could benefit from longer terms for particularly well-suited leaders. Meanwhile, sub-committees formed for special purposes such as initial work in hiring staff and vendors, were deemed effective in streamlining decisions and reducing debates. The committees were structured to include one Democrat, one Republican, and one Independent, and this was viewed positively as well. The number of sub-committees utilized was generally viewed positively, with no significant need to increase the amount of work done by sub-committees. Ensuring balance and fairness in leadership and committee roles was seen as crucial for future commissions.

Transparency was viewed as a strong point for the Commission, with all meetings live-streamed and recorded, shared on YouTube, and decisions made in public view. Commissioners emphasized the importance of all commissioners understanding the concept of transparency, especially in legal matters. Many felt that public access to extensive meeting minutes and reports further highlighted the commission's commitment to openness. Going forward, commissioners suggested that improving information management and summaries, particularly regarding public input, could make the process more accessible to the public and commissioners alike.

Ethical conduct within the commission was generally viewed as well-managed, with an appropriate code of conduct in place, though numerous commissioners mentioned a need for better enforcement mechanisms. Most commissioners felt that ethical guidelines were adhered to with good intentions, but occasional personality conflicts, and alleged code of conduct violations and potential conflicts of interest were noted. Addressing these through a robust code of conduct and potentially involving external enforcement mechanisms was suggested to help maintain integrity, though there was little agreement on exactly what types of enforcement mechanisms would be appropriate. Overall, commissioners and staff felt that the Commission worked with integrity and focused on doing the right thing, ensuring accountability and transparency in their work.

Public Input

Key findings:

- **Effectiveness of Public Engagement:** In-person public hearings offered deeper insights and genuine interactions, while emails and written comments often felt repetitive.
- **Challenges in Managing Feedback:** The high volume of comments was difficult to manage; suggested hiring additional staff, using AI tools, and seeking support from external consultants for better organization and synthesis, following the model developed by CLOSUP during the Senate remapping phase.
- **Mixed Reviews on Public-Submitted Maps:** Publicly-submitted maps provided useful ideas but were challenging to integrate due to software incompatibility; preference

identified for open-source tools and AI to improve transparency and streamline the process.

Commissioners and staff generally found the public input process valuable and helpful in guiding their decision-making. Most saw the public hearings and in-person engagement as particularly effective, offering a deeper understanding of public sentiment and allowing commissioners to ask follow-up questions. While emails and written comments often felt repetitive, the in-person interactions were viewed as more genuine and impactful.

However, managing the high volume of comments remained challenging, a point that was highlighted in the Commission's original "[Lessons Learned](#)" report, published in October 2022, when the commissioners suggested future commissions should hire additional help for managing and analyzing public input. Many commissioners found it difficult to review all comments on a timely basis. The support of external consultants or additional staff was recommended again by numerous commissioners after the remedial mapping efforts in spring 2024. There was a consensus that hiring more staff or utilizing AI tools could improve the organization and synthesis of public input, making it easier to handle the large volume of feedback effectively. The model developed by CLOSUP during the Senate remapping process to aggregate all comments into a single database, regardless of which input path was used (direct comments, emails, portal submissions, etc.), and to summarize the public comments by common themes was viewed as helpful and something the next MICRC should pursue and develop further.

The ability for residents to submit maps through the web portal had mixed reviews. Some commissioners found public-submitted maps beneficial for providing ideas and specific district preferences, while others struggled with the process due to the inability to integrate these maps with the commission's own mapping software. There was a preference for using open-source tools to improve transparency and ease of use.

Communities of Interest (COIs)

Key findings:

- **Effective Handling of COIs:** COIs were effectively prioritized using constitutional legislation, but challenges were encountered regarding conflicting viewpoints and self-identified COIs.
- **Recommendations for Future Processes:** Emphasized clear identification of COIs with specific markers, detailed submissions, and the creation of a database for better organization. Suggested continuous public training and educational outreach to help COIs advocate effectively.
- **Importance of In-Person Engagement:** In-person comments were seen as more genuine and impactful, aiding understanding of community needs. COIs should be specific and

passionate, avoid repetitive scripts, and provide clear reasons for their recognition and accommodation.

Commissioners generally felt that the Commission did a commendable job in dealing with Communities of Interest (COIs). They emphasized the importance of public comments in identifying COIs and the need for discernment among competing inputs. Commissioners and staff said that constitutional legislation provided a strong framework for prioritizing COI input, helping to give organized Michiganders a voice. However, commissioners acknowledged challenges such as conflicting viewpoints from different areas and the difficulty of defining and weighting COIs.

Several commissioners noted that the process of balancing COIs with other constitutional priorities was crucial and challenging. They recommended that COIs present legitimate reasons for their political representation needs rather than simply claiming unity. Clear identification and definition of COIs with specific geographical markers were advised, along with detailed submissions outlining population areas, schools, churches, and other community features. Commissioners suggested creating a database or repository to organize COI input better and emphasized the need for more methodical and collective documentation.

The importance for COI representatives of attending the Commission's public hearings and engaging in person was highlighted as a significant factor in understanding and addressing COIs. In-person comments were considered more genuine and impactful, helping commissioners grasp the specific needs and concerns of different communities. To make COIs more effective in future processes, commissioners advised that COI members be specific and passionate when voicing opinions, avoid repetitive scripts, and provide clear reasons for the recognition and accommodation of their COIs.

While the Commission's handling of COIs was generally praised, there were suggestions for improvement. The need for a balanced and hospitable process to manage biases and enhance trust was recognized. Commissioners advocated for continuous public training and educational outreach to help COIs understand how to best advocate for themselves effectively. Overall, the commission aimed to keep impactful communities together, recognizing the critical role COIs now play in the redistricting process.

Map Drawing

Key findings:

- **Initiating Mapping in Key Areas:** Start mapping in densely populated regions like Detroit and Southeast Michigan to address complex areas first and use local knowledge.
- **Data and Software Usability:** Ensure mapping software and data are user-friendly, accessible, and available from the start of the mapping work. Mixed views on considering

a hybrid approach with independent experts drafting initial maps to be further modified by the commissioners themselves.

- **Training and Collaboration:** Provide more comprehensive and earlier training, with a focus on in-person collaboration and continuous training sessions to build efficiency and relationships.
- **Balancing Participation and Expertise:** Mixed views on allowing commissioners to pass on drawing unfamiliar areas and on relying more on professional map drawers to streamline the process. Address issues like jumping between mapping areas or versions of maps, and managing data volumes.

The Commission adopted a round-robin approach to map drawing, with each commissioner provided with opportunities to draw districts before handing off that responsibility to the next commissioner in line. Commissioners had varied opinions on this mapping process and suggested several improvements for future commissions. Starting the mapping work in densely populated areas like Detroit and Southeast Michigan was a common recommendation, highlighting the importance of addressing the most complex areas first and leveraging local knowledge. There was an acknowledgment of the challenges posed by the round robin mapping method. Some commissioners thought that members should not be allowed to “pass” on their opportunity to draw districts, while others thought it was acceptable to decline one’s opportunity. There was more consensus that it would be helpful to maintain a sustained focus on one map type and/or region at a time when handing off mapping direction from one commissioner to another, for better continuity and effectiveness.

The use of data such as partisan vote history and demographic data during the mapping process was another critical area of discussion. Many commissioners found the mapping software and data useful but suggested that it needed to be more user-friendly and accessible to ensure effective use by all commissioners. They emphasized the importance of having all necessary data, such as voter partisanship and racial demographics, available from the start of map drawing efforts, to avoid frustrating revisions as was required by this Commission at various points when data were not initially available. Some commissioners noted the benefit of leaning more on the expertise of mapping consultants and considered a hybrid approach where independent experts draft initial maps for review and refinement based on community feedback, while most felt strongly that only commissioners should have a direct role in setting district lines.

Training and data understanding played significant roles in the mapping process. Commissioners appreciated the help from support staff in explaining complex data but felt that additional training and earlier access to all data would have been beneficial. There was a consensus that in-person collaboration could enhance efficiency and relationship building, which was hindered by the necessity of Zoom meetings due to COVID-19 and health-driven needs from some commissioners. Commissioners suggested starting the commissioner map-drawing training

earlier in the cycle to better prepare for the work ahead and utilizing continuous training sessions to ensure everyone remained on the same page.

Overall, while the collaborative mapping process was deemed effective, it was also described as challenging. Commissioners recognized the value of balancing participation and expertise, with some recommending that more reliance on professional map drawers could have streamlined the process. They also highlighted the importance of addressing issues such as jumping between mapping areas (different regions of the state) or map versions and managing overwhelming data volumes to improve the mapping process for future commissions. Despite the challenges, the commissioners' cohesive effort and leadership were praised.

Replacing Commissioners Mid-Process

Key findings:

- **Effective Orientation:** Recommendations included crash courses in necessary software, clear instructions, and meetings with key leaders.
- **Continuous Support:** Emphasized the need for ongoing support from fellow commissioners and staff, with the ability to review past meetings.

Onboarding new commissioners after the Commission's work began presented various challenges and opportunities for improvement. Overall, the replacement process, which followed the constitutional amendment, was viewed as effective. The need for thorough orientation was widely recognized, with suggestions for providing a crash course in necessary software and ensuring new members receive clear and timely instructions. Meetings with experts, the chair, executive director, and vice-chair were deemed crucial for setting expectations and answering questions, helping new commissioners become effective participants quickly. While some new members felt overwhelmed initially, support from fellow commissioners and staff helped them navigate the complexities. Continuous support and the ability to review past meetings, although impractical to expect fully, were also suggested to ease the transition. Implementing these suggestions can help to ensure new commissioners are well-prepared and can contribute effectively to the Commission's ongoing work.

Overall Challenges

Key findings:

- **Building Trust and Team Cohesion:** Establishing trust among commissioners, staff, and the public was crucial, with in-person meetings and robust personal relationships facilitating better teamwork and understanding compared with remote participation.
- **Logistical and Scheduling Challenges:** Extensive travel, managing conflicting public input, and the delayed census caused scheduling difficulties.
- **Addressing Inexperience and Providing Support:** Steep learning curve on the technicalities and nuances of the redistricting process; recommended building a positive

work environment, prompt hiring of staff, and improved protection and support for commissioners.

- **Insufficient and Delayed Funding:** Funding challenges were noted, including the limited budget compared with other states' independent commissions, and delays in funding decisions.

The commissioners reported facing several significant challenges beyond the COVID pandemic, one of the foremost being the task of building trust among themselves, the staff, and the public. Navigating the challenge of diverse personalities and backgrounds within the Commission and establishing trust was crucial. Many commissioners found in-person meetings more effective for communication and collaboration than virtual meetings, which were supported mainly during bad weather and peak COVID periods. Additionally, the need for intentional social interactions and robust personal relationships was emphasized as these interactions were seen to facilitate better teamwork and understanding among commissioners. Some commissioners felt that personal attacks and public scrutiny experienced by some commissioners highlighted the need for improved protection and support within the Commission.

Moreover, some commissioners felt that the lack of redistricting experience – including with the mapping software, legal considerations such as the Voting Rights Act, the details of Michigan's demographics, and more – among commissioners and the varying levels of understanding led to frustration and resentment. Building a positive work environment, ensuring in-person attendance when possible, hiring staff promptly, and emphasizing the importance of human interaction were all reported as ways to improve future commissions' effectiveness. In terms of logistical challenges, some reported that extensive travel led to exhaustion and that managing a large volume of conflicting public input was often difficult. Another substantial challenge identified was the delay of the census due to the COVID pandemic, which impacted the commission's timeline and data availability and led to persistent scheduling issues.

Funding challenges were noted. First, too little funding was provided by the state legislature compared with independent commissions in other states. In addition, delays in funding decisions by the state legislature in the appropriations process presented numerous ongoing challenges for the Commission's continuity of operations.

Most Helpful Factors

Key findings:

- **Support from Staff and Experts:** Knowledgeable staff played a crucial role in navigating challenges and handling logistics, allowing commissioners to focus on primary responsibilities.
- **Building Relationships and Camaraderie:** In-person meetings, social interactions, and informal gatherings fostered friendships and helped to create a cohesive unit.

- **Value of Public Engagement:** Public comments and community feedback were seen as incredibly valuable and a crucial part of the process.

The commissioners found various factors helpful in fulfilling their roles, with a strong emphasis on support from fellow commissioners, staff, and experts. Many highlighted the crucial role of knowledgeable staff, like Executive Director Edward Woods III and staff from the Michigan Department of State, in navigating new challenges and maintaining direction. The assistance in handling logistical issues and administrative tasks was particularly valued, as it allowed commissioners to focus on their primary responsibilities without distraction. Experts on redistricting and the Voting Rights Act were seen as providing enlightening insights, even if not all opinions were universally accepted, reinforcing the importance of diverse perspectives in decision-making.

Building relationships and maintaining a sense of camaraderie were also pivotal for the commissioners. In-person meetings were reported as particularly effective for fostering friendships and supporting each other during tense moments. The social interactions, including dinners and informal gatherings, were seen as helping to create a cohesive unit and to mitigate the stress of being in the public eye. Commissioners valued the dedication and good faith efforts of their peers, learning from each other despite differing opinions. Additionally, public comments were seen as incredibly valuable, with commissioners appreciating the engagement and feedback from the community, considering public input a crucial part of the process. Overall, the sense of duty, teamwork, and mutual respect among commissioners and staff contributed significantly to their successful collaboration.

Recommendations for Improvement

Key findings:

- **Transparency and Public Trust:** Make mapping software public and open-source to improve transparency and trust.
- **In-Person Collaboration:** Need for in-person meetings to foster relationships and collaboration, which virtual meetings cannot replicate. Ensure all commissioners can attend in person for better respect and understanding.
- **Geographic and Democratic Representation:** Improve geographic diversity within the Commission, including better representation from underrepresented areas.
- **Operational Improvements:** Address funding issues and align timing with Commission needs. Improve financial operations with more staff support and institutionalize the aggregation and management of public comments to enhance overall efficiency and effectiveness.

Commissioners and staff provided several key suggestions for improving the Commission's processes and structure. One major recommendation was to make the mapping software as public

and open-source as possible to enhance transparency and public trust. Additionally, many emphasized the importance of in-person meetings for building relationships and fostering effective collaboration, which virtual meetings could not replicate. Ensuring all Commissioners are present in person was highlighted as crucial for maintaining respect and understanding among members. There was also a call for clearer expectations of commissioner responsibilities in the original application to avoid future issues.

Although commissioners were chosen in a random process that weighted Michigan's regional population to produce a commission reflecting the state's geographic makeup, numerous commissioners felt the geographic representation was not adequate. As such, another significant suggestion was to address the geographic diversity within the Commission, ensuring representation from underrepresented areas like the Upper Peninsula, Grand Rapids, and northern Michigan.

Some commissioners also desired stricter limits on partisan fairness in the chosen maps, feeling that more could have been done to ensure partisan fairness, although others noted that COIs are ranked higher than partisan fairness in the Constitutional requirements, and thus felt that partisan fairness was handled appropriately. Meanwhile, some proposed changing the process to allow public voting on proposed maps for greater democratic accountability.

Addressing inadequate funding and aligning the timing of funding with the commission's needs to reduce dependency on the legislative schedule was also recommended, as delayed funding decisions by the state introduced ongoing challenges for the Commission's work.

Strengthening interpersonal relationships, institutionalizing the aggregation and analysis of public comments, and improving financial operations were seen as essential steps to enhance the commission's efficiency and effectiveness in future iterations.

Advice to Future Commissions

Key findings:

- **Collaboration and Continuous Learning:** Emphasize dedication, bonding, in-person meetings, and reviewing archived work to learn from past commissions.
- **Valuing Citizen Input and Preparedness:** Maintain the human element, value citizen input, be prepared for complexities, and strive for continuous improvement.
- **Build On Current Plans:** Rather than starting from scratch, commissioners emphasized that future commissions should build on what has already been created by this inaugural MICRC.

Commissioners offered valuable advice for future commissions, emphasizing the importance of dedication, collaboration, and continuous learning. They encouraged future commissioners to

bond with each other and face challenges head-on, recognizing the experience as rewarding and worthwhile. The significance of meeting in person to facilitate effective collaboration and understanding was highlighted, as was the value of thoroughly reviewing the archived work of previous commissions to learn from their successes and mistakes. Future commissioners were urged to maintain the human element in the redistricting process, valuing citizen input and engagement, and to be prepared for the complexities and criticisms that come with the role. Additionally, while this commission had to start planning from scratch, commissioners urged future commissions to build on what has now already been created. Overall, commissioners hoped that future commissions would consist of similarly dedicated and invested individuals, capable of building on the foundation laid by their predecessors while continuously striving for improvement.

Public Comment Recommendations from CLOSUP

In May 2024, the Commission hired a team of researchers at the Center for Local, State, and Urban Policy (CLOSUP) at the University of Michigan to support the redrawing process by systematically aggregating, managing, analyzing, and presenting findings on the extensive public comments submitted to the MICRC. Additionally, the team highlighted the following recommendations on collecting, analyzing, and reporting on public comment for future independent redistricting commissions. These suggestions aim to enhance the accuracy and efficiency of public comment collection and incorporation, ensuring that redistricting decisions are well-informed and truly representative of public opinion. These recommendations are designed to streamline the public input process, maximize the value of collected data, and improve transparency and accountability.

By implementing these recommendations, future redistricting commissions can better fulfill their mandate of creating fair and representative electoral maps while effectively engaging the public throughout the process.

Maintain a “Bottom-Up” COI Approach

Based on the relevant research from other independent redistricting commissions, the MICRC’s bottom-up approach is the most effective means of incorporating authentic public input and COIs into the redistricting process. A bottom-up approach, based on direct input from COI representatives, is the best means to actually protect COIs and avoid ad-hoc and uneven redistricting. However, the approach is likely to be resource and time intensive. The organization and review of thousands of public comments requires adequate staffing, as commissioners generally do not have the time or capacity to review and recall all of the submitted comments.

Even with a capable staff, the flood of comments requires summarizing. We recommend a memo-style, “thematic” approach to COIs: reviewing staff should 1) individually analyze and categorize each public COI comment and 2) present key trends synthesizing the most prevalent

themes that emerge from the data. The approach should mirror or build upon the CLOSUP team's May 20, 2024, COI memo (attached here as an appendix), in which the CLOSUP team individually reviewed each public comment, but presented summaries to the commission highlighting the most important trends and takeaways. This ensures a community-driven, bottom-up approach, while still ensuring that commissioners are not spending too much time wading through public comments. Organizing these comments could be expedited by using AI, but the initial review of each comment should still receive a human reviewer to ensure accuracy.

Encourage Specificity and Sufficiency in Public Comments

The most valuable public comments are those that are specific, providing succinct context and sufficient justification for their opinions. However, some comments often either lack context or include an overload of information. While receiving live public comments during public hearings during the Michigan re-mapping process, MICRC Commissioners often engaged commenters with follow-up questions. This was effective in eliciting deeper justifications and necessary context when needed and allowed for more accurate analysis of these public comments.

To build on this approach, commissions can implement more proactive tools. When submitting public comments, whether in-person or through an online portal, commenters should be required to complete an accompanying online form requiring more detailed information such as contact information, region, geographic boundaries of their COI, additional information regarding the substantive issues that define their COI, and reasons their COI requires legislative protection. This approach will ensure that commenters provide the necessary justification for their feedback, resulting in more consistent and valuable input. Commission staff may need to provide support to residents who wish to submit their views but struggle with a more demanding and detailed interface to the Commission.

Commissions could also consider providing example comments on their comment portals, pointing to key features of effective input, such as clarity, context, and justification. By highlighting high-quality comments, commissions can guide the public toward providing input that leads to more informed and representative redistricting decisions.

Build a Flexible and Responsive Codebook

A well-structured, adaptable codebook is critical for effectively categorizing, organizing and analyzing public comments. Staff members should begin with a foundational framework that includes a basic set of comment categories relevant to redistricting such as Region, Communities of Interest, and Process-specific comments, which will guide the development of specific summarizing codes. Through an iterative process, staff should allow for regular reviews and updates to these categories and codes as new themes emerge from public comments. This ensures that the codebook remains relevant and supports analysis throughout the comment collection period.

The codebook should allow for multi-level coding, capturing both broad themes and specific details. “Primary codes” can be used for general categories (the code “100” might signify a comment focusing on “COIs”) while “subcodes” provide more granular information (e.g. subcode code “106” could signify “African American COI”). To maintain flexibility, the codebook should use open-ended categories and “other” options. Clear definitions and real-world examples should accompany codes (in annotations, or in the margins) to ensure consistency across multiple coders.

In addition, the work of individual coders should be reviewed by other coders in a kind of “double-blind” process to ensure consistency, and when discrepancies emerge, a team leader should make final determinations on coding specific public comments.

Leverage Artificial Intelligence with Human Oversight

Artificial intelligence (AI) tools, such as ChatGPT, can enhance the efficiency and consistency of the coding process when used judiciously. A uniform codebook serves as an excellent foundation for AI-assisted coding. By providing the AI with the codebook and feeding it comments one at a time, team members can quickly generate initial code assignments for each public comment. This approach not only accelerates the coding process, but also helps team members familiarize themselves with the codes and maintain objectivity when reading comments.

However, AI should be viewed as a supportive tool rather than a replacement for human expertise. Public comments are often unique or complex, failing to fit neatly into predetermined categories. While maintaining a dynamic and expanding codebook can address this challenge, consistent human oversight and discernment is critical. Teams should implement a two-step process by which any analysis involving AI is subsequently checked over with a human review, to catch errors and misunderstandings.

Implement Transparent and Frequent Reporting

Public comments should be analyzed and presented to the commission at multiple stages throughout the redistricting process, rather than just at the conclusion of public comment collection. Aides should segment the comments into phases and produce a memo for each phase. This approach allows for the analysis to evolve in response to the changing dynamics of redistricting. CLOSUP’s two memos (both attached here as appendices) from the Senate remapping phase in 2024 exemplify how the focus of the redistricting discussion shifts over time, necessitating corresponding adjustments in the analysis. Depending on the specifics of a state’s process, additional memos may be necessary. Each memo should be presented to the commission to facilitate questions and discussion.

Conclusion

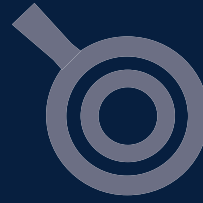
Many lessons were learned by Michigan’s commissioners and their staff throughout the inaugural redistricting process utilizing the state’s new approach to redistricting via the MICRC, most of which have been documented in the Commission’s original “lessons learned” report. Following the remedial court-imposed mapping efforts in spring, 2024, additional lessons were identified via structured interviews with the commissioners and their staff, as well as by CLOSUP staff who assisted the MICRC with management and analysis of public input for the first time during the state senate re-mapping work.

Highlights that stand out from those lessons include the importance of in-person attendance by commissioners in order to build relationships and a greater sense of cohesion on the Commission; a need for more staff and vendor support and therefore also for increased funding and faster state government decisions on supplemental funding requests; a need for additional training, tailored to the specific commissioners’ needs; a need to further improve public input processes, particularly including the management, analysis, and reporting on public comments; and opportunities to improve the actual map-drawing approach and processes. Numerous additional lessons and suggestions as described throughout this report were identified through the structured interviews following the court’s approval of the MICRC’s final maps for the state house and senate.

Michigan’s first set of citizen redistricting commissioners are particularly proud of their commitment to transparency, their ability to produce maps that were significantly better than pre-existing maps created by the state legislature, and how they valued and attempted to maximize public engagement and input. They encourage future commissioners to build a sense of team amongst themselves, to build upon the successes and approaches established by this inaugural Commission while looking for opportunities to make further improvements, and to keep the human element front and center during their public service.

Appendices

- 1.CLOSUP Memo #1— Initial Analysis of Public Comments on 2024 Remediated Senate Maps in Southeast Michigan
- 2.CLOSUP Memo #2 — Final Analysis of Public Comments on 2024 Remediated Senate Maps in Southeast Michigan
- 3.CLOSUP Memo #3 — Recommendations for Managing and Analyzing Public Input in Future Rounds of Michigan Redistricting



Michigan Independent Citizens Redistricting Commission (MICRC) Memo #1 — Initial Analysis of Public Comments on 2024 Remediated Senate Maps in Southeast Michigan

By Elizabeth Gelman, Danielle Hamer, Edward Plaut, and Tom Ivacko

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Executive Summary

This brief provides an initial summary of CLOSUP analysis of public comments submitted to the Michigan Independent Citizens Redistricting Commission (MICRC) in spring 2024 as part of the effort to draw new maps in Southeast Michigan as directed by a federal court. The full summary will be available in a subsequent memo.

The CLOSUP team analyzed 217 public comments from 103 individuals submitted to the MICRC between March 21 and May 21, 2024, on the proposed redistricting maps for Wayne, Oakland, and Macomb Counties. The most frequent concerns were the Commission splitting jurisdictions across districts and requests to keep Communities of Interest (COIs) whole. The team grouped these comments by county and analyzed them along these key jurisdictional and COI themes:

- **Wayne County:** Several respondents emphasized the importance of keeping Detroit whole to prevent the dilution of the city's voting power. Respondents also advocated to keep Middle Eastern and North African (MENA) communities whole by ensuring Warrendale joins Dearborn and Dearborn Heights. Others advocated to keep the Downriver areas, the Grosse Pointes and Romulus whole.
- **Oakland County:** Respondents in Oakland County emphasized the importance of keeping township communities whole. Several noted the Chaldean American community in the Troy-Rochester area and requested to be kept with the community in Sterling Heights. Townships in southeast Oakland County requested to be grouped with one another and expressed some willingness to be grouped with northern Wayne County across 8 Mile Road.
- **Macomb County:** Commenters on Macomb County expressed a desire to keep certain jurisdictions intact based on shared

Key Takeaways

- **Data:** 217 public comments on MICRC revised maps addressing 1011 specific points from March 21 to May 21, 2024.
- **Most common concerns:** 1. Keep jurisdictions whole, 2. Communities of Interest (COIs) whole
- **Wayne:** Protect African American, Downriver, and MENA COIs. Avoid diluting Detroit's voting power with suburbs. Keep Romulus and Dearborn whole.
- **Oakland:** Protect Chaldean COI in Rochester and Troy. Keep southeast Oakland townships whole and together.
- **Macomb:** Protect Chaldean COI in Sterling Heights. Keep townships and cities like Warren and the Lakeshore communities whole and separate from Detroit.
- **Partisan Fairness:** Maintain fair and competitive elections. Keep process transparent.
- **CLOSUP team suggestion:** Encouraging more specific public comments, including preferences for draft maps, proposed changes, and rationales.

demographics and infrastructure. Many supported keeping Warren whole and aligning it with nearby areas, while others emphasized maintaining the integrity of Lakeshore communities. Protecting COIs, particularly the Chaldean community centered in Sterling Heights, was a key concern, with recommendations to preserve district boundaries that reflect shared economic and public service ties.

- **Partisan Fairness:** The largest share of process-related comments expressed concerns about partisan fairness and competitive districts, emphasizing the need for transparency. Commenters pointed to Macomb County as a key jurisdiction to maintain compactness. Additionally, respondents advocated for the Commission to design competitive districts that accommodate racial and cultural diversity, particularly in Detroit and Dearborn.

Background

In November 2018, the citizens of Michigan passed Proposal 2, which amended the Michigan Constitution to place congressional and state legislative redistricting in the hands of a new Michigan Independent Citizens Redistricting Commission (MICRC). The Commission drew and passed new maps for the state in 2021-22, however, in December 2023, a federal court ruled in the case of *Agee v Benson* that the MICRC must redraw seven State House and six State Senate maps. The analysis below provides details on the comments submitted in spring 2024 during hearings on the Commission's proposed remediated State Senate maps.

Methodology

The CLOSUP team collected the comments from three sources: (1) MICRC meetings; (2) the Michigan Mapping Public Comment Portal (the "Public Comment Portal"); and (3) the My Districting Mapping Portal (the "Mapping Portal"). To assess these comments, the team pulled the comments from the relevant source and added it to the comment database spreadsheet. The database included all relevant information about the comment, including the date of testimony, where the comment was made or posted, the commenter's name and residence (if provided), and if the commenter was representing only themselves or a group.

Next, the team divided and "coded" the comments, assigning each comment relevant codes based on its content. The CLOSUP codebook (available in full in the Appendix) has five categories of codes to represent the public comments: (1) region; (2) community of interest (COI); (3) procedural mapping comments; (4) substantive mapping comments; and (5) miscellaneous comment categories. The team used the existing codebook from earlier student drafts built during the original redistricting cycle and updated it with new codes where necessary. Naturally, most comments contained several codes to reflect the multiple requests and insights of the comment. For example, a comment from a Dearborn resident might argue that they are part of a MENA COI and ask the Commission to keep Dearborn and their COI whole in the map. This comment would receive codes 113 (Dearborn/Dearborn Heights region), 201 (MENA COI), 410 (prioritize keeping COI whole), and 411 (prioritize keeping jurisdiction whole).

In order to limit bias and efficiently code the comments, the CLOSUP team initially used the University of Michigan GPT AI service to analyze the comments. The team provided the AI with the annotated codebook and asked it to determine which codes best applied to each comment with a justification. The team members then read the full comments themselves and made necessary corrections to the AI's code assignments. Additionally, most of the comments involved a second team member double-checking the codes and correcting the first member's decisions when necessary.

For the purposes of this memo, the team focused on comments with codes 406 (concern that maps mishandle jurisdiction boundaries), 407 (concern that maps mishandle COIs), 410 (prioritize keeping a COI whole), and 411 (prioritize keeping jurisdictions whole). Although the MICRC constitutional criteria places COIs much higher than jurisdictional boundaries, many commenters articulated their COIs in terms of their jurisdiction. As such, the team re-reviewed comments with these codes and analyzed the testimony for recurring themes. The team split the comments internally based on the three major counties at issue in the redistricting: Wayne, Oakland, and Macomb.

Findings

Overview/Quantitative Counts

From March 21, 2024 through the May 21st, 2024 Mapping Meetings, the team coded 217 comments from 103 individual commenters. Across those submissions, the team identified 1011 specific points addressed using its codebook. The MICRC meetings, both the public hearings and the regular mapping meetings, made up the bulk of the comments, with 132 comments coming at these meetings. Eighty-eight of these comments came from the Commission's public hearings and 44 came from the regular mapping meetings. By comparison, 65 comments came from the Public Comment Portal, 17 from the Mapping Portal, one by email, and one by letter.

On one hand, that is an impressive level of resident participation over a short period of time in a process that before 2020 was conducted behind closed doors and which was not accessible to them. On the other hand, the roughly 103 unique people who submitted comments represent just a tiny sliver of the metro Detroit population. And a good number of these 103 people submitted comments more than once, with a few submitting quite a few comments across multiple meetings and across the different submission paths.

A number of speakers represented groups as opposed to speaking solely for themselves. Many comments (23) came from representatives of the Detroit Downriver Chapter of the A. Philip Randolph Institute (APRI) to advocate for Downriver Wayne County COIs. These commenters generally advocated for keeping the Downriver communities in the same district as the City of Detroit, as opposed to surrounding metro Detroit communities. Several comments (five) came from representatives of the Arab Community Center for Economic and Social Services (ACCESS) to advocate for protecting MENA COIs in Dearborn and western Wayne County. Some comments (four) represented their church community and others (six) came from municipal politicians on behalf of their constituents.

Across all respondents, the most common theme the comments addressed were jurisdictional boundaries and COIs. Sixty-six comments were concerned that a map mishandled a jurisdictional boundary, with 33 comments requesting to keep the referenced jurisdiction whole. Fifty-four comments requested that the Commission keep the referenced COI whole, with 22 concerned that the maps mishandled a COI. The most common COIs referenced were MENA communities (21), African American Communities (20), economic COIs (18), and shared public resources (11). Many other comments (29) referenced a range of other cultural or ethnic minorities in the City of Detroit and in metro Detroit, including Latino, Chaldean, and Asian American COIs.

For the most part, however, comments from across metro Detroit emphasized jurisdictional boundaries. Although the Commission's constitutional criteria prioritize addressing COIs over jurisdictional boundaries, commenters often used their city, county, or township as a shorthand reference for the bounds of their community. This meant that commenters effectively treated the jurisdiction as the COI itself (despite the court's finding that jurisdictions are not COIs for Michigan's redistricting process since they are ranked separately and lower than COIs in the

criteria). Because of this overlap between jurisdiction and COI, the most common request was for the Commission to preserve jurisdictional boundaries whenever possible. As the following county sections show, many comments requested that the Commission maintain their jurisdiction's boundaries and then explained which jurisdictions to include in their district.

Wayne County Comments

A significant number of residents (around 35) discussed communities in Wayne County. Many emphasized the importance of keeping the city of Detroit whole (although that is not possible given district population limits) or splitting it into fewer districts, some respondents citing that this would prevent diluting the voting power of Detroit's large African American population. Five comments advocated for keeping the Downriver communities along the Detroit River together. Some of these respondents requested the communities be combined with Detroit as the entire area is part of an industrial belt and therefore faces similar environmental concerns, while others recommended Detroit be kept separate due to differing economic conditions.

Arab American and MENA communities, largely centered in Dearborn, were another key concern, with multiple comments (three) urging to keep areas like Warrendale unified with Dearborn in the same district. Other commonly mentioned communities were the Grosse Pointes, which respondents requested be kept together. Several comments also highlighted Romulus, recommending the city stay intact due to the Detroit Metro Airport economic community and a particular focus on the entire city accessing one representative that can represent its unique needs. Overall, commenters aimed to unite areas with shared racial and ethnic demographics and for districts to take into account shared infrastructure and economic communities.

Oakland County Comments

Sixteen of the 89 individual commenters discussed Oakland County communities. As with Macomb and Wayne county communities, commenters generally wanted the Commission to keep their townships whole to better advocate for their shared public services. The most common COI in Oakland County (nine comments) was the Chaldean-American community. These comments noted a preference for the old Linden map's 9th State Senate district, which included Rochester, Troy, and Sterling Heights together. One commenter also noted that Troy and Sterling Heights shared an Asian American COI.

Other comments (four) from southeast Oakland County townships (Royal Oak, Southfield, Huntington Woods, Ferndale, Hazel Park, Berkley, Madison Heights) wanted to be grouped together. One commenter suggested that this collection of metro Detroit townships should run as far north as Clawson and Troy. Generally, these commenters appeared more open to the Commission "crossing" 8 Mile Road into Detroit than those from Macomb, noting similar cultural communities with northern Wayne County. These commenters did not specify how far into Wayne County they thought the Commission could reasonably extend. Although these commenters often phrased their COIs in terms of jurisdiction, many pointed to the shared school districts, community events, and shopping centers. Two commenters from the Pontiac City Council also suggested that Pontiac should be kept together with Southfield and Detroit, and not with Rochester.

Macomb County Comments

Comments from Macomb County (23) generally advocated to keep jurisdictions and COIs together. A group of comments (five) advocated for Warren to be kept whole, citing the need for more representation for the jurisdiction. One of these commenters requested Warren be grouped with Eastpointe Centerline, Roseville, and northern Detroit due to the shared infrastructure. Unlike the trend from Oakland County commenters, Macomb County comments (three) overall advocated for the separation of Detroit from Macomb County districts, rather than districts that combine areas across 8 Mile Road. They cited differing demographics between the two regions.

Six comments mentioned District 12 of the old Linden map covering the Lakeshore communities, with two recommending the Lakeshore communities are kept together (Mt. Clemens, Harper Woods, part of Clinton Township). However, one of these Lakeshore comments advocated for Fraser to be kept with western Macomb townships rather than the Lakeshore communities.

Of Macomb County comments, ten mentioned protecting COIs in the redistricting. Like Oakland County comments, the most common COI cited among commenters from Macomb County was the Chaldean community (six). Although the Chaldean comments noted multiple pockets of Chaldean population across Oakland and Macomb counties (Warren, West Bloomfield, Shelby Township), commenters consistently regarded Sterling Heights as the center of the COI. These comments advocated for the Chaldean community to be kept together and wanted the Commission to keep the Linden 9th District (Rochester, Troy, and Sterling Heights) whole. One commenter cited that these jurisdictions also share school districts, economic corridors, and federal resources. An additional comment asked the Commission to keep Sterling Heights with Macomb and Clinton Townships due to economic and public service communities of interest.

Comments on Partisan Fairness

A significant number of comments (40) related to concerns regarding partisan fairness and competitive districts. Comments call for transparently communicated and easily understood metrics of partisan fairness. They also cite competitive elections as crucial in Macomb Township, Shelby Township, and Sterling Heights, emphasizing that districts align with communities such as those formed around major infrastructures like Mound Road.

Comments within this category frequently cited Detroit and Dearborn, stressing the importance of designing competitive districts that not only accommodate the racial and cultural makeup of these communities but also promote fair elections reflective of diverse populations. For example, commenters expressed a preference for the publicly submitted “Motor City Map” as it does not excessively prioritize race while creating majority-Black districts that potentially offer a more balanced partisan mix. There is also support for maintaining compact districts in Macomb County that capture its demographic changes.

Conclusion

In conclusion, the commenters frequently requested that the Commission keep their jurisdictions whole. Commenters typically based this on their shared public services, economic hubs, and cultural similarities. For the most part, commenters from Macomb County were more averse to inclusion with Wayne County and Detroit than commenters from Oakland County. Several COIs, some spanning multiple townships and counties, asked to stay together, notably the African American, Chaldean, Downriver, and MENA communities.

To improve the findings for the June 24th memo, commissioners should continue to encourage commenters to be as specific as possible. The CLOSUP team aimed to faithfully report the content of the public comments without making unreasonable inferences. The team could often not use unspecific and generalized comments in this analysis. The best comments made specific references to the relevant subject matter (township, road, COI, etc.) and provided clear analysis of why the Commission should incorporate their suggestion.

As such, it was very helpful when commissioners asked follow-up questions at the public hearings for commenters to provide more information with their comment. The Commission or Executive Director could clarify these best practices during public hearings or follow-up public comments with additional questions. Particularly for the next memo, comments should try to specify (1) which draft maps they prefer, (2) how they would change existing draft maps, and (3) why.

Appendix

CLOSUP Annotated Codebook

The CLOSUP team's annotated codebook and the frequency of codes in the 217 total comments. As discussed, the team performed additional analysis on the 406, 407, 410, and 411 comments.

01	Region (Either commenter residence or focus of comment)
101	City of Detroit—44 comments
102	Metro Detroit—97 comments (often touched on multiple counties) • Oakland County—21 comments • Wayne County—44 comments • Macomb County—30 comments • Taylor
103	Lansing area—0 comments • Ingham County
104	Grand Rapids area—0 comments • Kent County
105	East Central MI—0 comments • Flint • Midland • Saginaw • Tri-Cities
106	Upper Peninsula—14 comments (single commenter) • Marquette
107	Western MI/Lakeshore—0 comments • Muskegon • Berrien County • Ottawa County
108	Washtenaw County—0 comments • Jackson • Ann Arbor • Ypsilanti
109	Southwest MI—0 comments • Kalamazoo
110	Northwest Michigan—0 comments • Traverse City
111	Thumb—0 comments • Port Huron • Kingston

112	Northern Michigan—0 comments • South of UP, usually rural
113	Dearborn/ Dearborn Heights—23 comments
199	City, County, Municipality Other than Listed—0 comments
02	COI
201	MENA (Middle Eastern North African)—21 comments • Also Muslim community • Mention of ACCESS
202	African American/Black Community—20 comments
203	Native Americans/Indigenous Community—1 comment
204	Bengali—1 comment
205	Hispanic/Latino—8 comments
206	AAPI (Asian American Pacific Islander)—1 comment
207	Unions—1 comment • UAW (United Auto Workers)
208	Watershed—2 comments
209	Farming/agriculture—0 comments
210	Religious Community—6 comments
211	Schools and School Districts—10 comments • Includes universities
212	Shared Publicly Funded Resources—11 comments • Utilities like Water & Electric • Community Centers • Fire & Police Departments • Hospitals
213	Other economic communities—18 comments • Auto companies (not to be confused with unions) • Tourism
214	Minority Community- Unspecified—18 comments
215	Neighborhoods—4 comments
216	LBGTQI+ Community—0 comments
217	Rural Community—0 comments
218	Urban Community—2 comments
299	Other COI—16 comments

03	Process
301	Hiring Staff—4 comments
302	African American/Black Community—20 comments
303	Technology/Portal—8 comments
304	Request for Meetings/Continue Process—9 comments
305	Budget/Salaries—2 comments
306	Accessibility—10 comments
307	Pro-Staff—9 comments
308	Con-Staff—19 comments Use also for con staff hiring
309	Legality of process—23 comments Concern with constitutionality of law
310	Ensure Fair Map Voting procedure—2 comments In reference to when commissioners were voting on maps
399	Other process comments—28 comments

04	Maps
401	Pro Draft Map—49 comments i.e. “I like Linden, Cherry, Pine”
402	Con Draft Map—37 comments
403	Publicly Submitted Map Preference—25 comments Includes support for their map submission
404	Partisan Fairness & Competitive Districts—40 comments “Packing” and “cracking” comments
405	Compactness—12 comments
406	Concern that Maps Mishandle Jurisdiction Boundaries—66 comments i.e., respect County, City, and Township Boundaries
407	Concern that Maps Mishandle COIs—22 comments
408	Suggested Change for a Draft Map—24 comments
409	Voting Rights Act issues—14 comments
410	Prioritize keeping COI whole—55 comments
411	Prioritize keeping Jurisdictions whole—34 comments
499	Other comments on maps—3 comments

05	Other
501	Prison Gerrymandering—0 comments
502	Name & Address Requirement for Public Comment—0 comments
503	Secret Memos/Private Meeting Concern—10 comments
504	Commissioner Political Affiliation—2 comments
599	Other unspecified—2 comments



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The analysis presented here represents the views of the authors. It does not necessarily reflect the views of the University of Michigan or the Michigan Independent Citizens Redistricting Commission (MICRC).

MICRC Commissioners

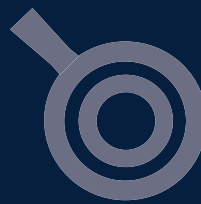
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Michigan Independent Citizens Redistricting Commission (MICRC) Memo #2 — Final Analysis of Public Comments on 2024 Remediated Senate Maps in Southeast Michigan

By Elizabeth Gelman, Danielle Hamer, Edward Plaut, and Tom Ivacko

August 2024

Executive Summary

This brief provides a review of CLOSUP analysis of public comments submitted to the Michigan Independent Citizens Redistricting Commission (MICRC) in spring 2024 as part of the effort to draw new maps in Southeast Michigan as directed by a federal court. The initial summary was presented in an earlier memo, and a final set of lessons learned, and future recommendations will be available in a subsequent memo.

The CLOSUP team analyzed 1,463 public comments to the MICRC from 415 individuals submitted between May 21 and June 21, 2024, on the proposed state senate maps for Wayne, Oakland, and Macomb Counties. The most popular of the twelve draft maps were Szetela (Plan #404) and Heron (Plan #376). The Kellom (Plan #403) and Cardinal (Plan #373) maps also received many positive comments. In general, commenters most frequently noted a map's partisan fairness performance, how the map handled relevant Detroit-area COIs, and how the map protected major jurisdictions within the new state senate districts. The team analyzed the comments by map:

- **Szetela (#404):** Szetela received the most positive comments and the highest overall net favorability rating (the number of “like” commenters minus “dislike” commenters). Commenters consistently praised the Szetela map's partisan fairness metrics and Voting Rights Act (VRA) compliance. Commenters appreciated the protection of Detroit-area COIs and many Oakland County jurisdictions. Some commenters were apprehensive about the Szetela map's splitting of the Chaldean COI in Sterling Heights and Troy.
- **Heron (#376):** Heron received the second most positive comments and the second highest overall net favorability rating. Commenters consistently praised Heron's partisan fairness

Key Takeaways

- **Data:** 1,463 public comments on MICRC revised maps, 415 unique commenters, 4,082 specific points addressed
- **Most Common Concerns:** 1. Partisan Fairness, 2. Keep Jurisdictions and Communities of Interest (COIs) whole
- **Most Preferred Maps:** 1. Szetela (Plan #404), 2. Heron (Plan #376)
 - » **Szetela (#404):** Most popular and commented on map. Commenters liked strong partisan fairness metrics and protection of Detroit and Oakland County COIs.
 - » **Heron (#376):** Second most popular. Commenters liked strong partisan fairness metrics with some hesitation on Metro Detroit COIs.
 - » **Kellom (#403):** Third highest favorability rating. Commenters liked strong partisan fairness metrics, but not as many comments as other preferred maps.
 - » **Cardinal (#373):** Heavily commented on map, but polarizing. Commenters liked the protection of the Chaldean COI, but disliked the partisan fairness numbers.
- **Region-Specific Comments**
 - » **Szetela (#404) and Kellom (#403)** received consistently positive comments across all regions.
 - » **Heron (#376)** received positive feedback from all regions except Macomb County, which gave negative feedback overall.
 - » **Cardinal (#373)** received the most disagreement across regions with negative feedback overall from all regions except Macomb County, which gave positive feedback overall.

metrics and VRA compliance. Commenters appreciated the protection of Wayne and Oakland COIs, but there was greater criticism from Macomb County residents of the map's treatment of the Chaldean COI and Macomb County communities.

- **Kellom (#403):** The Kellom map received the third highest net favorability rating, but did not receive as many total comments as the other positively rated maps. Commenters appreciated the Kellom map's treatment of Detroit's COIs, the preservation of many Oakland County jurisdictions, and the map's strong VRA compliance. Commenters did not like some of the COI districting decisions and thought that the partisan fairness metrics, while good, could have been stronger.
- **Cardinal (#373):** Cardinal received the most comments of any map with many positive comments, particularly from Macomb County commenters. Positive commenters appreciated the protection of the Chaldean COI in Sterling Heights and Troy. However, the map received a negative net favorability rating from all other regions for its poor partisan fairness metrics.
- **Other Maps:** All other maps received negative overall favorability ratings. Crane (#385), Dove (#364), and Finch (#399), while receiving negative overall ratings, did receive positive favorability ratings overall among Macomb County commenters. Generally, commenters on the remaining eight maps pointed out the poor partisan fairness metrics and lack of protection for COIs and Detroit-area jurisdictions.

Background

In November 2018, the citizens of Michigan passed Proposal 2, which amended the Michigan Constitution to place congressional and state legislative redistricting in the hands of a new Michigan Independent Citizens Redistricting Commission (MICRC). The Commission drew and passed new maps for the state in 2021-22, however, in December 2023, a federal court ruled in the case of *Agee v Benson* that the MICRC must redraw seven State House and six State Senate maps. The analysis below provides details on the comments submitted in spring 2024 during hearings on the Commission's proposed remediated State Senate maps.

Methodology

The CLOSUP team followed a similar "coding" methodology as it did in its [May 20, 2024 memo](#). The team coded publicly submitted comments through close-of-business June 21, 2024.

Map Preference Coding: For the purposes of this memo, the team focused on draft map preferences among commenters. First, the team assigned each of the twelve draft maps a new "600" map code within its database.¹ Second, the team then used a system of decimal subcodes to indicate a comment's level of support for the maps it mentioned: 6XX.1 indicated support, 6XX.2 indicated opposition, and 6XX.3 indicated a suggested modification. For example, a comment that supported the Szetela map but disliked Dove would receive codes 611.1 (support for Szetela map) and 603.2 (opposition to Dove). The team also assigned unique Commenter ID codes to every person who submitted a comment, to track multiple submissions by a single commenter (Note: This database will be available for downloading from the CLOSUP website for any stakeholders to examine in detail.)

Using these map preference codes and the unique commenter IDs, the team evaluated each map's **net favorability rating**. The team calculated a map's net favorability by subtracting the number of unique "dislikes" from the

number of unique “likes” each map had. Because the calculation used only unique likes and dislikes, each commenter could only affect a specific map’s count once, but the team would still aggregate their “votes” across multiple comments. For example, if a unique commenter expressed support for Heron in twelve separate comments, it would still only count as one positive vote for Heron. If the same commenter then opposed Dove in a different comment, that opposition would be added to that commenter’s unique file as one negative vote for Dove.

After tallying up all positive and negative comments from each unique commenter, the team calculated the net favorability of the maps. One way to think about this calculation is as a voting ballot: each commenter could vote for, against, or make a suggestion on each map, with their single ballot aggregated across their multiple comments. Commenters could spread their thoughts across multiple comments, but could not vote on an individual map multiple times.

The team used the University of Michigan GPT AI service, with human review of its findings, in order to synthesize the broad trends across the many comments. For a further explanation of our process, please see the Appendix. All AI results were confirmed by hand to ensure their veracity.

As was discussed at previous Commission hearings, there were likely advocacy campaigns in favor and against certain draft maps. Nonetheless, our goal was to faithfully report each unique commenter’s mapping preferences. As such, we did not filter out any comments that expressed an opinion on the draft maps, even if the comment appeared to be copied from a template or mimic other comments. So long as the comment came from a unique commenter, their comment was included in our analysis.

Following the initial memo draft submitted to the Commission on June 24th, the team updated this memo, conducting quantitative and qualitative analysis of comments including:

- All Mapping Portal comments through close-of-business on Friday, June 21, 2024
- The 76 comments made at the June 13, 2024 Public Hearing
- The 26 comments made at the June 20, 2024 Public Hearing

These comments were broadly consistent with the previously described broad trends, including sentiments about COIs and specific jurisdictions. The following findings analyze all public comment submitted between May 21, 2024 and June 21, 2024.

Findings

Overview/Quantitative Counts

From the May 21, 2024 Remote Meeting through close-of-business June 21st, 2024, the team coded 1,463 comments from 415 individual commenters. Across those submissions, the team identified 4,082 specific points addressed using its codebook. The Mapping Portal made up the bulk of the comments, with 1,189 coming from that portal. 186 comments came from the Commission’s town halls, public hearings, and remote meetings. By comparison, 84 comments came from the Public Comment Portal, 2 by letter, and 2 by email. Many commenters made repeat appearances across forums, submitting a comment in the Mapping Portal, speaking at a hearing or meeting, and following up their testimony in the Public Comment Portal. Again, their support or opposition to specific maps

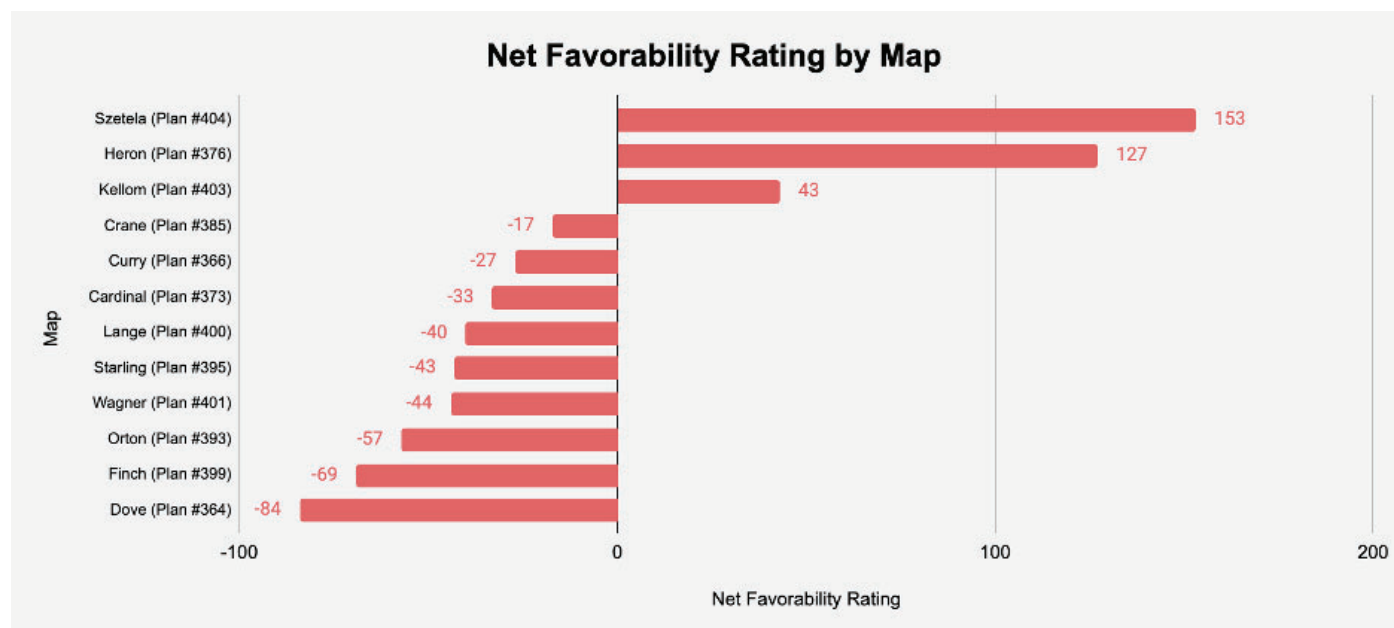
would only be counted once per map, regardless of how many times they may have expressed that support or opposition across these public input paths.

On one hand, this is an impressive level of resident participation over a short period of time in a process that before 2020 was conducted behind closed doors and which was not accessible to them. On the other hand, the 415 unique people who submitted comments represent just a tiny sliver of Michiganders. In total, 268 people submitted comments from Detroit and the metro Detroit area at issue in the redistricting. 147 commenters submitted their feedback from other parts of the state (or did not state where they were submitting from), including the Ann Arbor, Lansing, and Grand Rapids areas.

A number of speakers represented groups as opposed to speaking solely for themselves.² Several comments (5) came from representatives of the Detroit Downriver Chapter of the A. Philip Randolph Institute (APRI) to advocate for Downriver Wayne County COIs. These commenters generally advocated for keeping the Downriver communities in the same district as the City of Detroit, as opposed to surrounding metro Detroit communities. Several comments (10) came from the Chaldean Community Foundation and Chaldean Voices Matter groups, advocating for the protection of the Chaldean-American COI. Several comments (7) came from representatives of the Arab Community Center for Economic and Social Services (ACCESS) to advocate for protecting MENA COIs in Dearborn and western Wayne County. Others (2) spoke on behalf of Voters Not Politicians (VNP) in support of VNP's partisan fairness memo or in support of politically equitable redistricting. Some municipal politicians (3) spoke on behalf of their constituents.

Individual Map Analysis

Four maps came to the forefront of our analysis: Szetela (#404), Heron (#376), Kellom (#403), and Cardinal (#373). Szetela, Heron, and Kellom maps were the only maps that received a positive net favorability rating overall. While Cardinal has negative net favorability, we included it in our analysis due to the large number of comments in both directions.



The Overall Net Favorability Rating of Each Draft Map

Szetela (Plan #404)

253 of the 415 unique commenters commented on the Szetela map, the most of any map. This map was the most popular in terms of total positive comments and net favorability rating, with 194 commenters in support of the map and 41 in opposition. Eighteen commenters noted potential changes to the map.

Partisan Fairness: Commenters praised the Szetela map's strong performance in partisan fairness, with numerous positive comments highlighting balanced representation across political parties. The Szetela map received the highest number (over 100) of favorable mentions for this criterion compared to other maps. While a few comments raised concerns about community divisions potentially impacting partisan fairness, these were significantly outweighed by positive assessments.

Geographic Representation: The map generally received positive feedback for its representation of various counties and cities, particularly in Wayne County and Oakland County. It was praised for effectively maintaining community integrity in Detroit and representing communities in Southwest Detroit. However, some concerns were raised about the division of certain communities, especially the Chaldean community, and the handling of areas like Taylor and Farmington Hills.

Communities of Interest: The Szetela map garnered significant praise for its representation of various COIs, including Latinx communities in Southwest Detroit and the MENA COI in Dearborn and Oakland counties. However, a notable criticism emerged regarding the inadequate protection of the Chaldean COI, with multiple comments indicating that this community was split across several districts. Some concerns were also raised about the division of other ethnic groups, such as the Arab community in Macomb County.

Heron (Plan #376)

245 of the 415 commenters commented on the Heron map. Heron was the second most popular map in terms of net favorability rating, with 181 commenters in support and 54 in opposition. Eleven commenters had proposed suggestions for the map.

Partisan Fairness: Heron is widely praised for its approach to partisan fairness. Although there are some critiques, the critiques are not very specific and the positive comments significantly outnumber the negative ones.

Geographic Representation: Heron received mixed feedback regarding its treatment of specific jurisdictions, viewed as representing some communities well, while splitting others. Heron was praised for protecting cities in Wayne and Oakland County like Pontiac. Some comments raised specific concerns about splits in Sterling Heights and Troy and issues with combining it with districts containing Detroit residents.

Communities of Interest: Heron is seen as fair and protective of various COIs, including Arab, Black, Latino, and LGBTQ communities, with several mentions praising its enhancement of racial equity. However, the most prominent criticism is related to the treatment of the Chaldean COI, with many comments asserting that the map either disrespects or splits this community across multiple districts, with a particular focus on fracturing Chaldean communities in the 11th district.

Kellom (Plan #403)

95 of the 415 commenters commented on the Kellom map. This map had the third highest net favorability rating, with 67 commenters in support and 24 in opposition. Four commenters had proposed suggestions for the map. Despite the Kellom map's positive reception from those that did comment, it did not receive even half as many commenters as either Heron or Szetela.

Partisan Fairness: The Kellom map received mixed feedback regarding its partisan fairness, with some comments criticizing its partisan fairness metrics. A few comments mention the need for tighter adherence to VRA compliance. While much of the feedback leans negative, some comments suggest that the Kellom map ranks well or second-best after the Szetela map in achieving balanced representation.

Geographic Representation: Some commenters acknowledge that the Kellom map protects certain geographic communities, particularly Oakland County interests, while others disapprove of the map's boundary decisions affecting cities like Royal Oak. Some say the map does well in preserving community boundaries surrounding Detroit. Several comments approved of the Kellom map's representation of Detroit, as well as downriver communities and their industrial-related needs, while others noted that the Kellom map was not representative of Detroit areas. Some comments suggested that the Kellom map combines areas that may not share common interests, such as merging Harper Woods and Detroit with the Grosse Pointes, or linking Southern Oakland County with Macomb.

Communities of Interest: Several comments note that the map effectively keeps Southwest Detroit together, aligning with the interests of the Hispanic community in that area. Other comments assert that the Kellom map divides COIs like the Chaldean community.

Cardinal (Plan #373)

220 of the 415 commenters commented on the Cardinal map. Cardinal had the sixth highest net favorability rating (though it's negative overall), with 90 commenters in favor of the map and 123 in opposition. Seven commenters had proposed changes for the map.

Partisan Fairness: Negative sentiment on partisan fairness stands out, with a substantial number of comments arguing that Cardinal is bad for partisan fairness.

Geographic Representation: Several comments note that Cardinal divides Romulus, noting the importance that the municipality be kept whole because of its unique needs due to Detroit Metro Airport and other transportation infrastructure. Commenters laud the map for keeping certain areas in Macomb County whole. Others mention that the map protects Detroit neighborhoods. Some criticism comes from the mention that while Cardinal keeps specific communities together, it fails to be as representative or inclusive of all community needs, such as the industrial-related needs of downriver communities, compared to other maps like Heron and the Kellom map.

Communities of Interest: Many of the positive commenters on Cardinal noted the map's protection of the Chaldean COI akin to the old Linden map. Other commenters mentioned that Cardinal also protects Arab communities and the Clinton River Watershed. Meanwhile, some comments broadly mention that the map fails to promote racial equity and question whether the map would comply with the VRA.

Other Maps

The remaining maps received consistently negative feedback overall. Crane received 77 commenters and had the fourth highest net favorability rating, with 28 positive commenters and 45 negative commenters. Curry received 64 commenters and the fifth highest net favorability rating, with 16 positive commenters and 43 negative commenters. Lange received 64 commenters and the seventh highest net favorability rating, with 11 positive commenters and 51 negative commenters. Starling received 60 comments and the eighth highest favorability rating, with 7 positive commenters and 50 negative. Wagner received 58 comments and the ninth highest favorability rating, with 6 positive commenters and 50 negative commenters. Orton received 72 commenters and the ninth highest favorability rating, with 7 positive commenters and 64 negative commenters. Finch received 100 commenters and the tenth highest rating, with 14 positive commenters and 83 negative commenters. Dove received 126 commenters and the lowest favorability rating, with 19 positive commenters and 103 negative commenters.

Partisan Fairness: The public commentary on the proposed Crane, Starling, Dove, Finch, Curry, Lange, Orton, and Wagner maps was significantly dissatisfied overall with partisan fairness. This trend is pronounced in remarks about Dove, Orton, Finch, Lange, and Wagner. Many comments also raised potential issues with the Voting Rights Act, where commenters were concerned that the Lange, Wagner, and Curry maps would not provide sufficient minority-majority representation compared to the original Linden map.

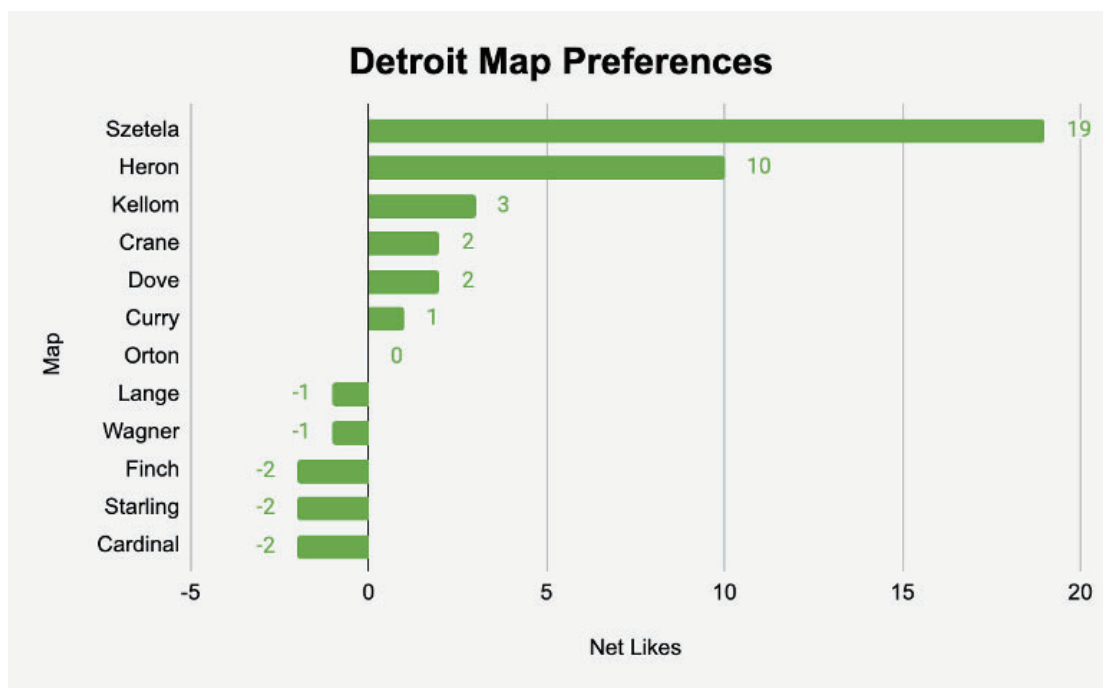
Communities of Interest: The handling of communities of interest (COIs), including the representation of minority groups, emerged as another significant concern from the comments. Commenters criticized these specific maps for their handling of diverse ethnic COIs, with the Chaldean community frequently cited as a group that has been unfavorably split, particularly by the Orton and Wagner maps. Moreover, commenters contended that maps like the Lange and Curry maps undermined the African American COI's representation in and near Detroit, noting potential VRA compliance issues. Downriver communities also argued that Crane failed to represent the unique economic and environmental interests of more industrial Wayne County communities.

Geographic Representation and Community Boundaries: Comments also address the issue of geographical cohesion and respect for community boundaries in the proposed maps. Commenters criticized the combination of distinct communities—linking urban to rural communities or grouping districts that do not share common interests—in the Starling and Wagner maps. Commenters disliked the connection between disparate communities such as Harper Woods, Detroit, and Grosse Pointes, or Sterling Heights and rural Macomb County.

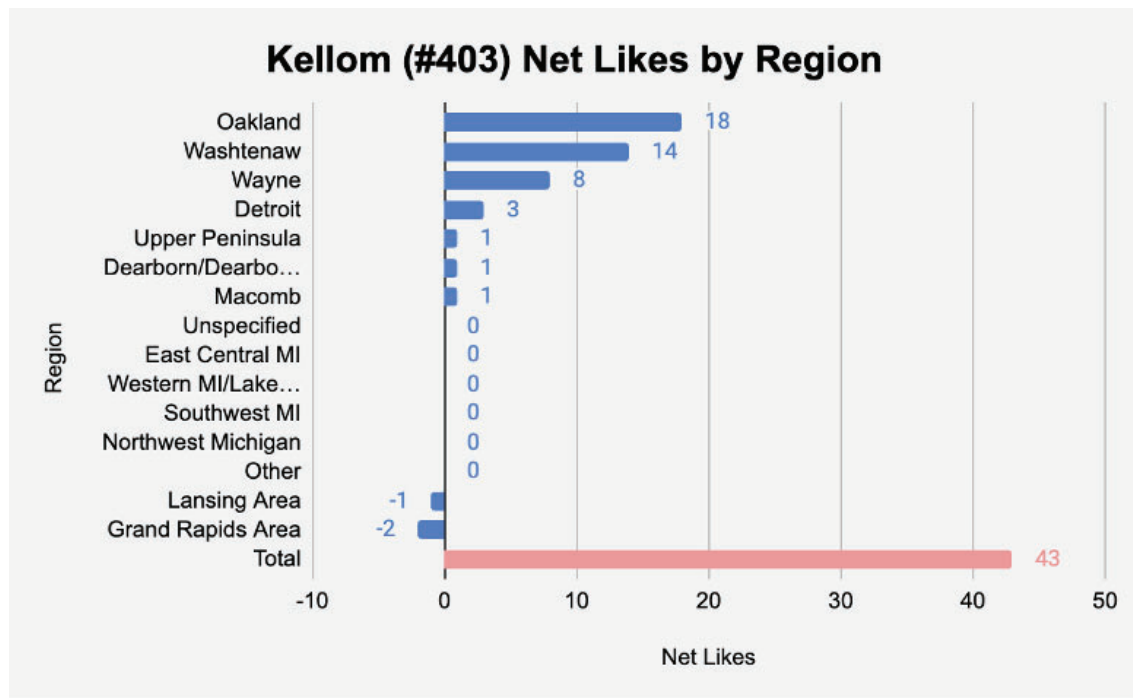
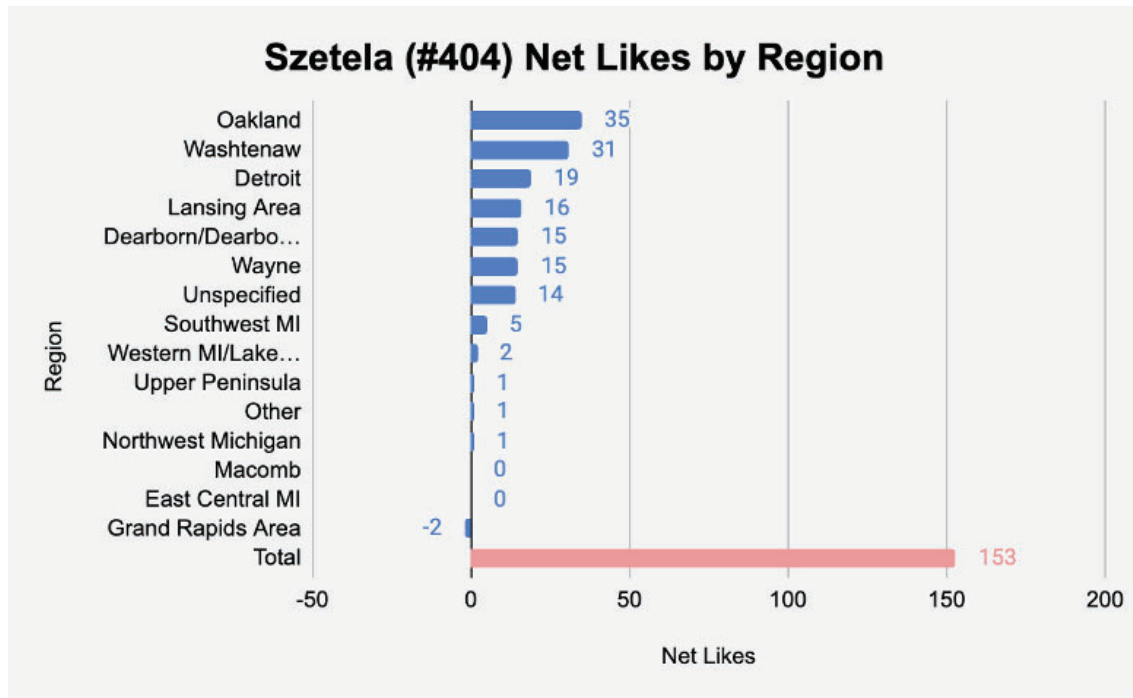
Regional Map Preferences

We analyzed the relationship between a commenter's location and their mapping preferences. In total, 102 commenters came from Oakland County, 59 from Macomb County, 51 from Detroit, 19 from Dearborn and Dearborn Heights, 37 from other Wayne County areas, 49 from the Lansing area, 40 from Washtenaw County, 4 from the Grand Rapids area, 7 from Southwest Michigan, 2 from East Central Michigan, 2 from Western Michigan, 2 from the Upper Peninsula, 1 from Northwest Michigan, and 39 from an unlisted or unreported location.

As a whole within each region, commenters tended to be in agreement with one another about liking or disliking a map. Commenters from Detroit rated the Szetela and Heron maps most favorably. Oakland County commenters were largely in agreement on liking the Szetela, Heron, and Kellom maps, and Macomb County commenters vastly favored Cardinal. Washtenaw County commenters liked the Szetela and Heron maps most, Finch and Cardinal least.³

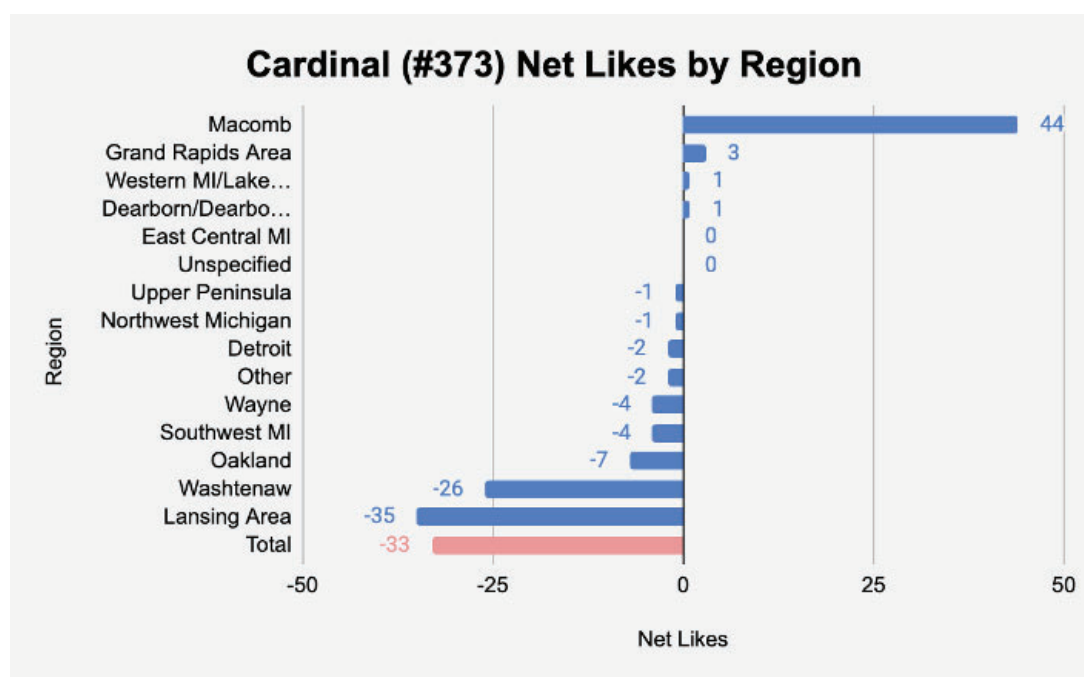
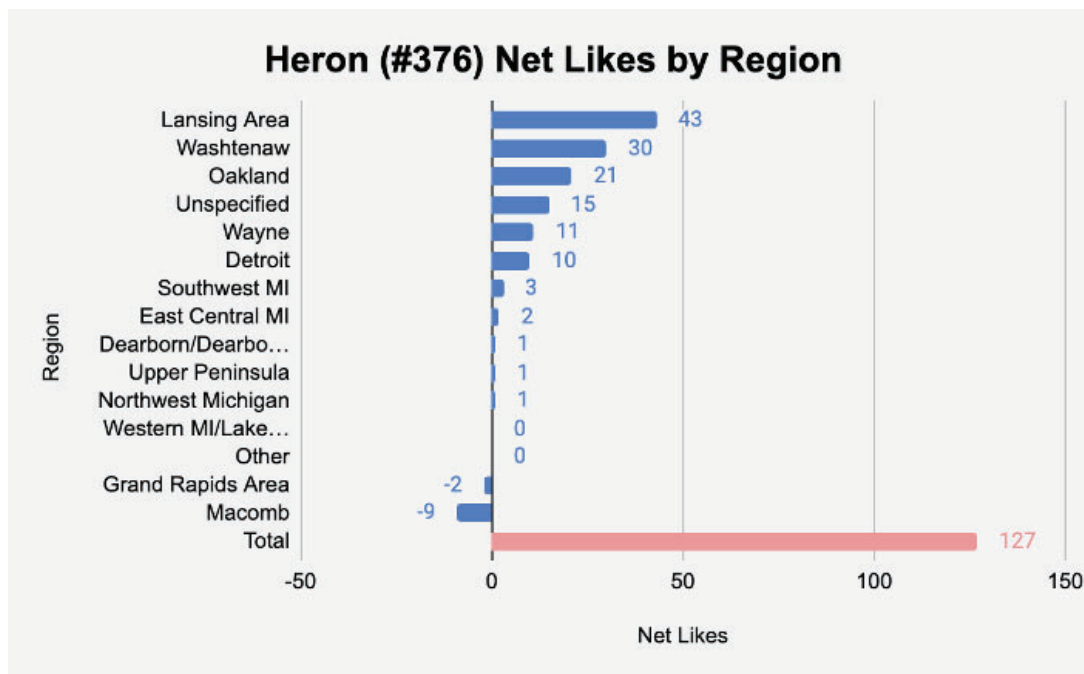


Next, we examined the regional breakdown in preference for each individual map. While we calculated the aggregate net favorability rating for each map, this additional analysis broke down that number further. Many maps showed agreement across regions. The Wagner, Orton, Lange, and Starling maps all consistently had a negative net favorability rating across almost all regions.⁴ Finch, Dove, Curry, and Crane were additionally quite consistently negative apart from Macomb County comments which were net positive. The Szetela and Kellom maps both received mostly consistently positive net favorability ratings across regions.



Heron (#376), Cardinal (#373), and Macomb County

Heron and Cardinal received split feedback across regions. Heron, while receiving an aggregate positive net favorability rating of 127, was overall disliked by Macomb County residents (-9). Commenters from the Lansing area (+43), Washtenaw County (+30), and Oakland County (+21) comprised the majority of positive net commenters. Cardinal, however, received the most disagreement across regions. While the aggregate net favorability rating shows a net negative of -33 commenters, Macomb County commenters overwhelmingly favored this map with a net positive of 44 commenters. Oakland County (-7), Washtenaw County (-26), and Lansing area (-35) commenters, however, had net negative comments.



Conclusion

In conclusion, the Szetela (#404), Heron (#376), and Kellom (#403) maps received the highest net favorability ratings, with the Szetela map receiving the highest overall rating. The Cardinal (#373) map also received many positive commenters, but still had an overall negative net favorability rating. The remaining eight maps received broadly negative ratings.

In making their comment, commenters emphasized (1) the importance of partisan fairness metrics and (2) the protection of their COI and jurisdiction. There were regional preferences among the different maps, but the Szetela map was still positively rated overall across all regions.

The CLOSUP team will provide suggestions and changes to the public comment solicitation and analysis process for future redistricting cycles in a later memo.

Notes

1. See the Appendix for a breakdown of the new 600 codes.
2. JUNE 25, 2024 UPDATE: These totals changed with the introduction of new mapping data. These numbers are not updated.
3. See the Appendix for the map preferences of other, non-Detroit regions.
4. See Appendix for regional breakdowns of Wagner, Orton, Lange, Curry, and Starling.

Appendix

CLOSUP Annotated Codebook

Note: The numbers in the codebook have not been updated since the initial June 24, 2024 memo. The CLOSUP team's annotated codebook and the frequency of codes in the 1155 total comments.

NOTE: the listed frequencies **do not** account for unique commenters.

01	Region (Either commenter residence or focus of comment)
101	City of Detroit—111 comments
102	Metro Detroit—610 comments (often touched on multiple counties) • Oakland County—366 comments • Wayne County—78 comments • Macomb County—166 comments • Taylor
103	Lansing area—198 comments • Ingham County
104	Grand Rapids area—21 comments • Kent County
105	East Central MI—4 comments • Flint • Midland • Saginaw • Tri-Cities
106	Upper Peninsula—8 comments (single commenter) • Marquette
107	Western MI/Lakeshore—9 comments • Muskegon • Berrien County • Ottawa County
108	Washtenaw County—185 comments • Jackson • Ann Arbor • Ypsilanti
109	Southwest MI—13 comments • Kalamazoo
110	Northwest Michigan—1 comment • Traverse City
111	Thumb—0 comments • Port Huron • Kingston

112	Northern Michigan—0 comments • South of UP, usually rural
113	Dearborn/ Dearborn Heights—30 comments
199	City, County, Municipality Other than Listed—7 comments
02	COI
201	MENA (Middle Eastern North African)—143 comments • Also Muslim community • Mention of ACCESS
202	African American/Black Community—87 comments
203	Native Americans/Indigenous Community—0 comments
204	Bengali—5 comments
205	Hispanic/Latino—14 comments
206	AAPI (Asian American Pacific Islander)—13 comments
207	Unions—0 comments • UAW (United Auto Workers)
208	Watershed/ Environmental COI—10 comments
209	Farming/agriculture—0 comments
210	Religious Community—4 comments
211	Schools and School Districts—12 comments • Includes universities
212	Shared Publicly Funded Resources—19 comments • Utilities like Water & Electric • Community Centers • Fire & Police Departments • Hospitals
213	Other economic communities—22 comments • Auto companies (not to be confused with unions) • Tourism
214	Minority Community- Unspecified—9 comments
215	Neighborhoods—10 comments
216	LBGTQI+ Community—17 comments
217	Rural Community—8 comments
218	Urban Community—11 comments
299	Other COI—109 comments • Includes Chaldean COI

03	Process
301	Hiring Staff—0 comments
302	Hearing Conduct—9 comments
303	Technology/Portal—1 comment
304	Request for Meetings/Continue Process—0 comments
305	Budget/Salaries—0 comments
306	Accessibility—4 comments
307	Pro-Staff—0 comments
308	Con-Staff—4 comments Use also for con staff hiring
309	Legality of process—8 comments Concern with constitutionality of law
310	Ensure Fair Map Voting procedure—0 comments In reference to when commissioners were voting on maps
399	Other process comments—30 comments

04	Map Themes
404	Partisan Fairness & Competitive Districts—677 comments
405	Compactness—7 comments
406	Concern that Maps Mishandle Jurisdiction Boundaries—64 comments i.e., respect County, City, and Township Boundaries
407	Concern that Maps Mishandle COIs—38 comments
409	Voting Rights Act issues—44 comments
410	Prioritize keeping COI whole—387 comments
411	Prioritize keeping Jurisdictions whole—119 comments
499	Other comments on maps—3 comments

05	Other
501	Prison Gerrymandering—0 comments
502	Name & Address Requirement for Public Comment—0 comments
503	Secret Memos/Private Meeting Concern—1 comment
504	Commissioner Political Affiliation—0 comments
599	Other unspecified—0 comments

06	Draft Maps (total pro/con/change comments, including by repeat commenters)
601	Cardinal (Plan #373) 601.1, Pro—163 comments 601.2, Con—136 comments 601.3, Change—7 comments
602	Crane (Plan #385) 602.1, Pro—54 comments 602.2, Con—47 comments 602.3, Change—4 comments
603	Dove (Plan #364) 603.1, Pro—35 comments 603.2, Con—116 comments 603.3, Change—4 comments
604	Finch (Plan #399) 604.1, Pro—26 comments 604.2, Con—87 comments 604.3, Change—3 comments
605	Heron (Plan #376) 605.1, Pro—219 comments 605.2, Con—112 comments 605.3, Change—11 comments
606	Starling (Plan #395) 606.1, Pro—7 comments 606.2, Con—72 comments 606.3, Change—3 comments
607	Curry Map (Plan #366) 607.1, Pro—29 comments 607.2, Con—45 comments 607.3, Change—5 comments
608	Kellom (Plan #403) 608.1, Pro—89 comments 608.2, Con—26 comments 608.3, Change—5 comments
609	Lange Map (Plan #400) 609.1, Pro—21 comments 609.2, Con—56 comments 609.3, Change—4 comments
610	Orton Map (Plan #393) 610.1, Pro—19 comments 610.2, Con—70 comments 610.3, Change—1 comment

611	Szetela Map (Plan #404) • 611.1, Pro—234 comments • 611.2, Con—94 comments • 611.3, Change—20 comments
612	Wagner Map (Plan #401) • 612.1, Pro—11 comments • 612.2, Con—55 comments • 612.3, Change—5 comments

University of Michigan GPT Analysis

The CLOSUP team used the following prompts to track broad trends from the CLOSUP public input database. First, the team created short summary sentences (“Heron protects partisan fairness.”) for each of the public comments to provide the U-M AI clear, consistent data. Such sentences were quite short given the size of the comment database.

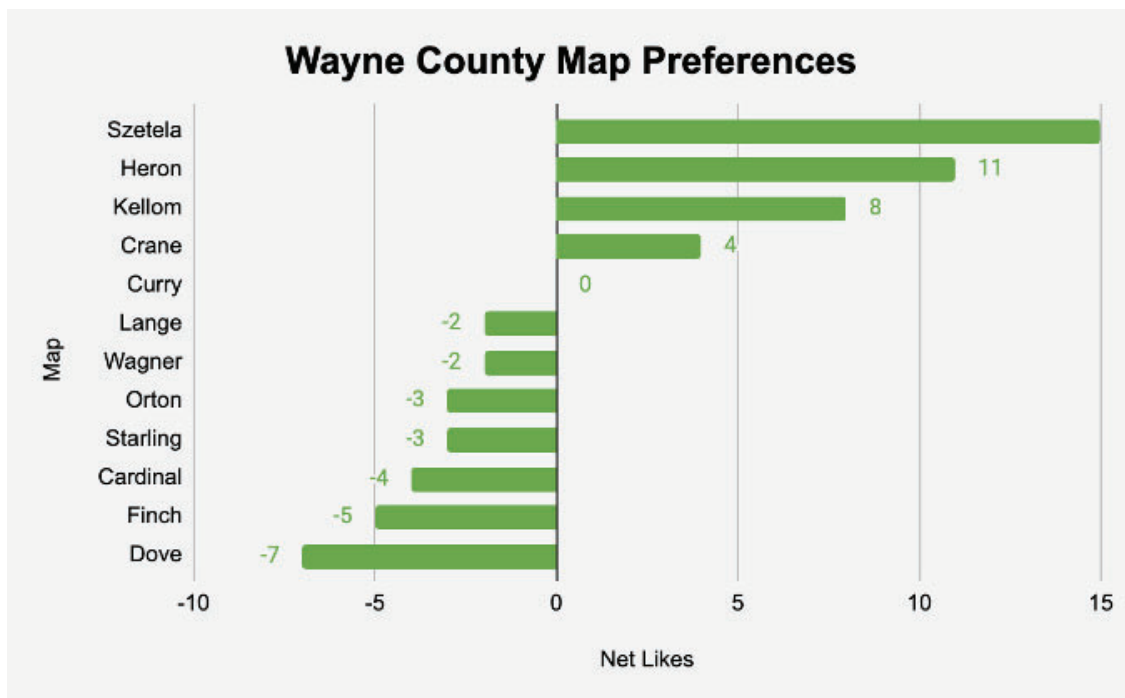
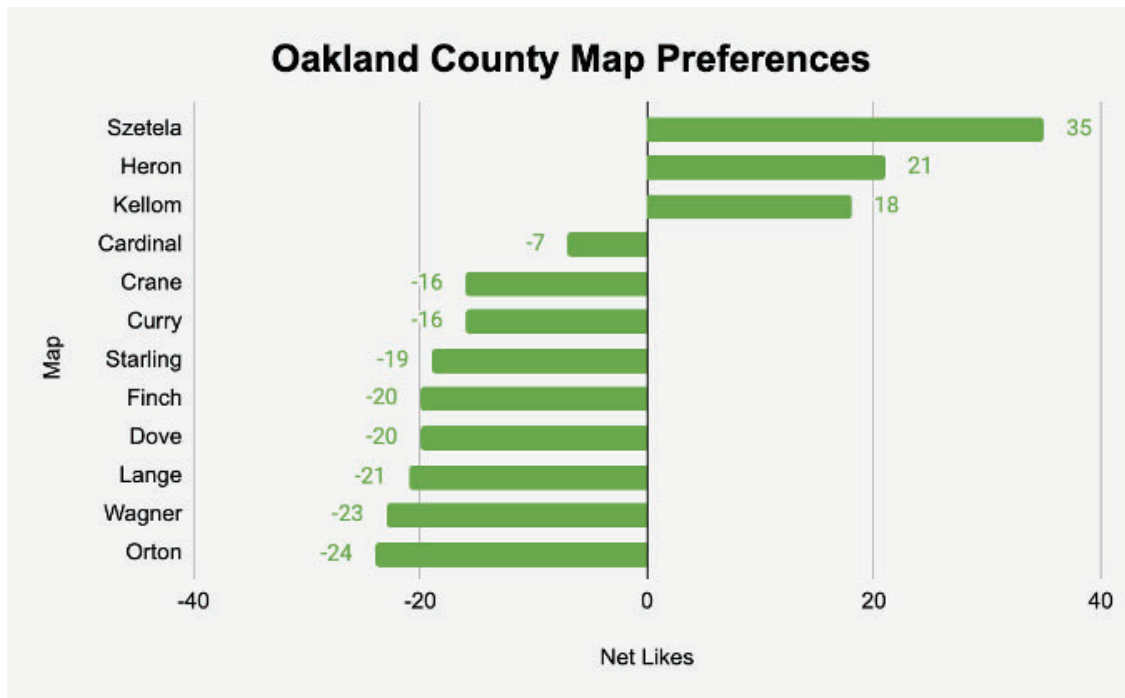
Second, the team asked the AI the below prompts in order to summarize those sentences.

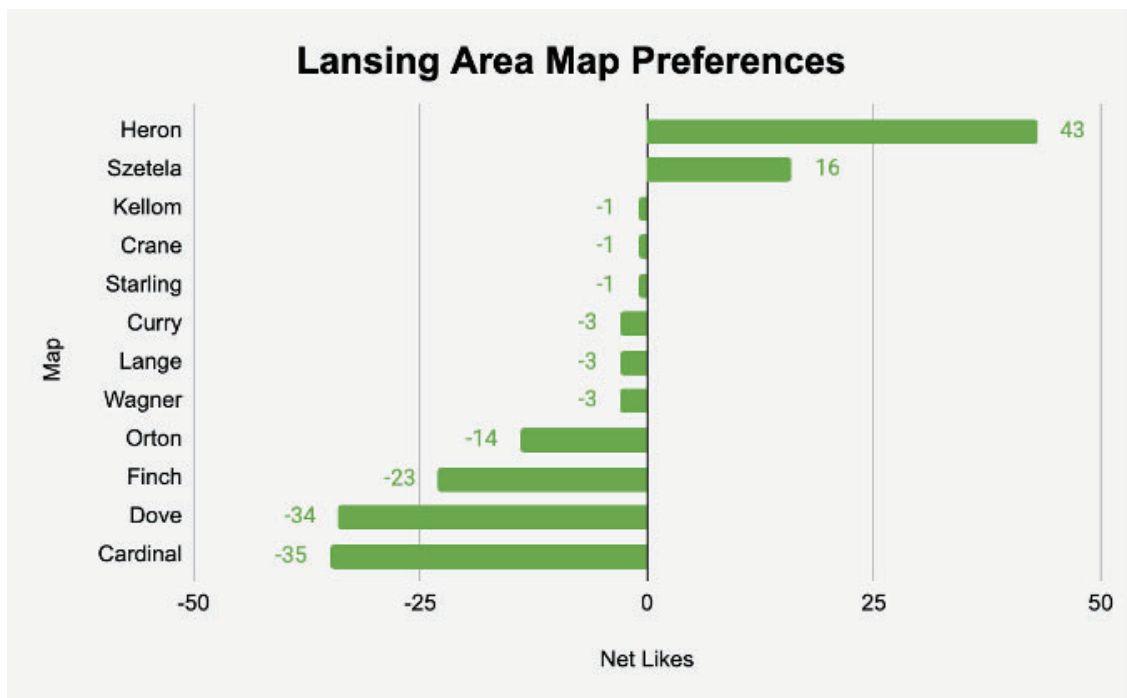
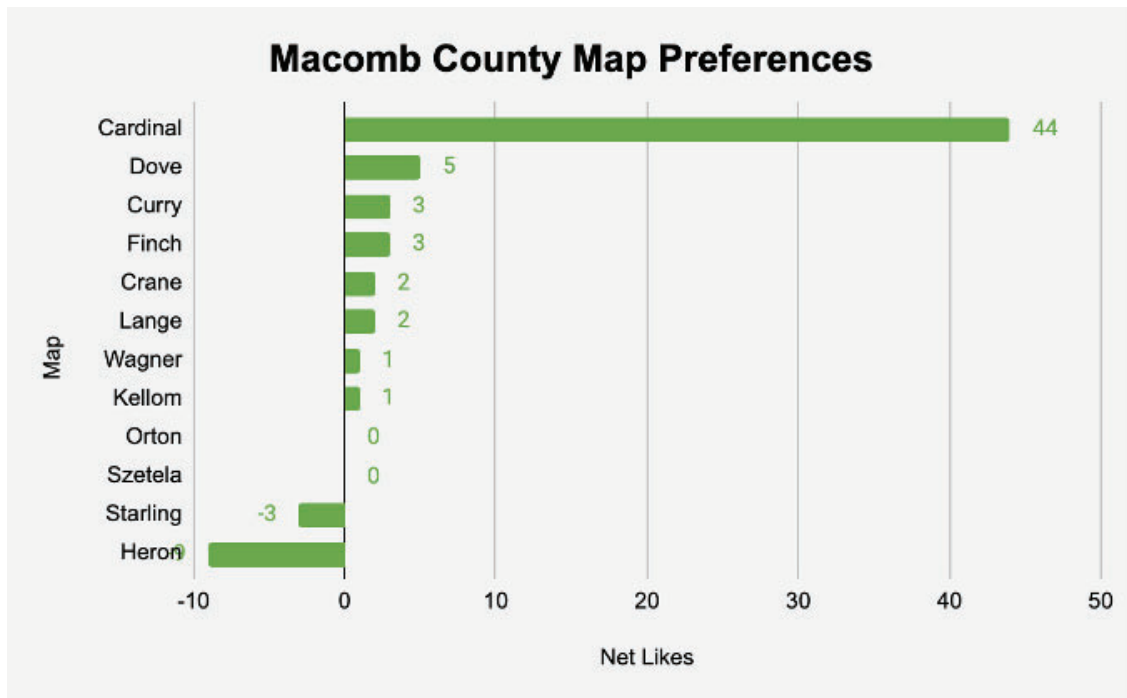
1. Please use the following sentences, each of which is a unique comment, to extract topline trends about the [XX] map. Consider commenters ‘ suggestions for changes to the map, disadvantages of the map, and advantages. Please explain which share of comments were negative/positive, etc. and be as specific as possible. Please accurately refer to the share of comments when possible to explain trends.
2. Using the comments above, please analyze each of the following themes: 1). How many comments believe the map to have partisan fairness? How many criticize partisan fairness? What are the general takeaways about fairness in this map? 2). What do the comments say about how the map draws districts in specific locations, including in Macomb County? Wayne County? Oakland County? The city of Detroit? 3). What do the comments say about the map’s treatment and representation of communities of interest (COIs) and minority communities?

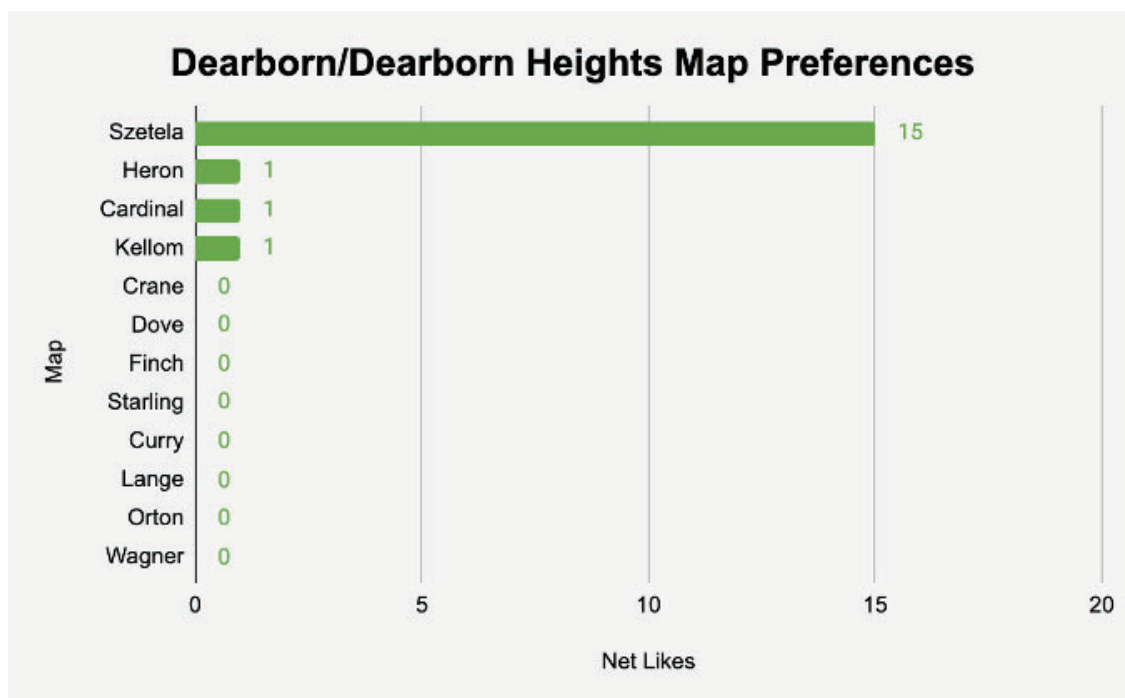
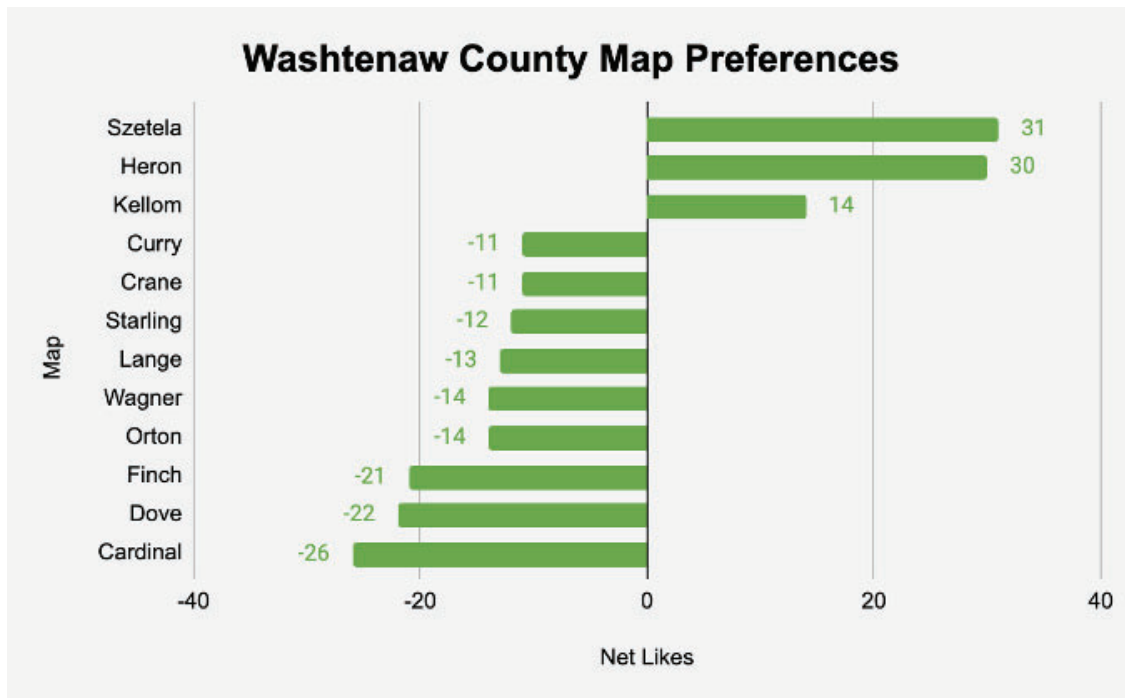
Information extracted from U-M GPT was subsequently cross referenced in the public comment database by members of the CLOSUP team. Although the team members hand-coded every comment in the database, there were simply too many comments to offer an unbiased and complete analysis of the feedback. Nonetheless, the team made necessary corrections to the AI’s responses summarizing the map preference trends in the below map-specific findings. The U-M GPT interface can be found [here](#).

Other Regional Preference Data

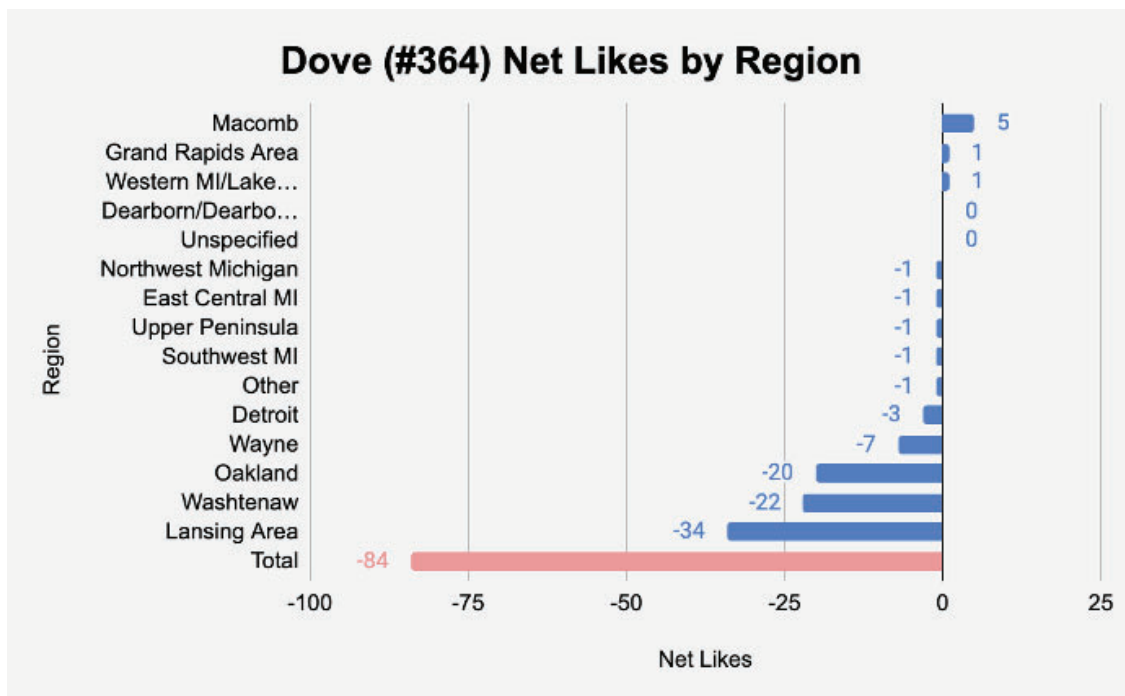
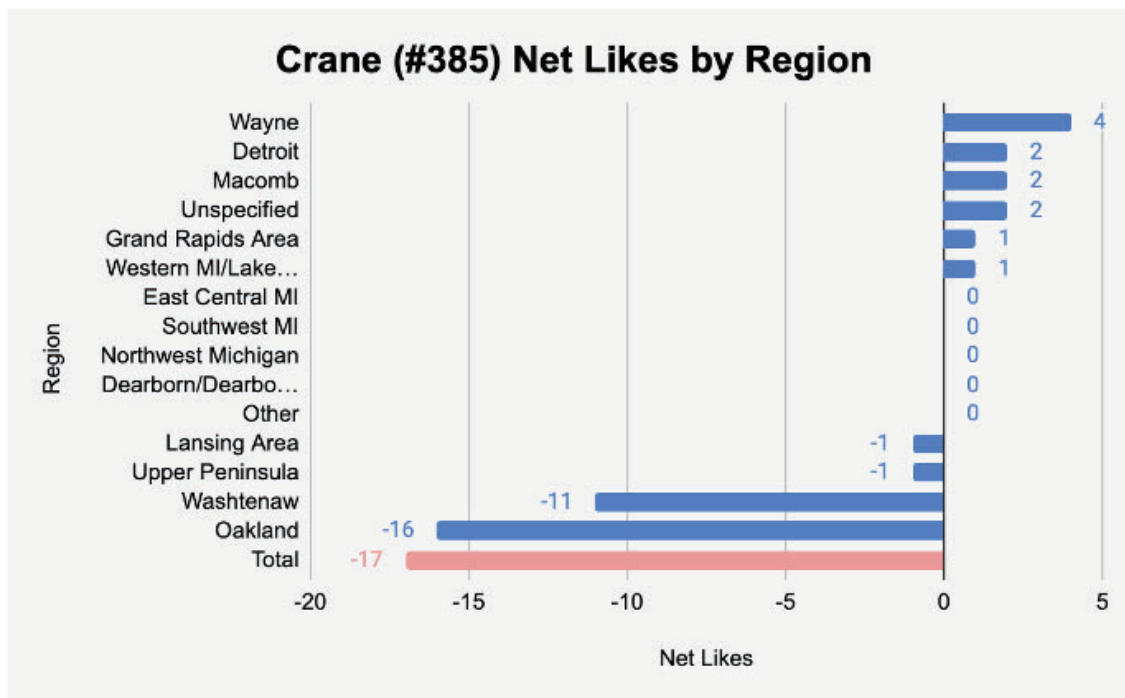
The map preferences of regions with the most commenters.

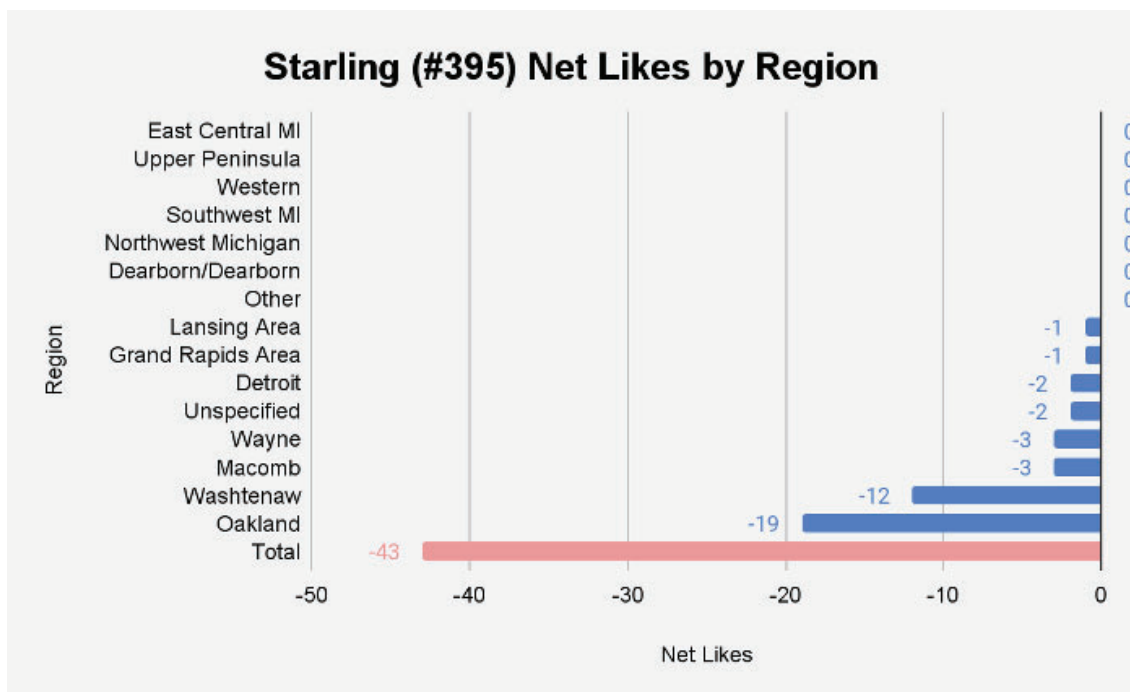
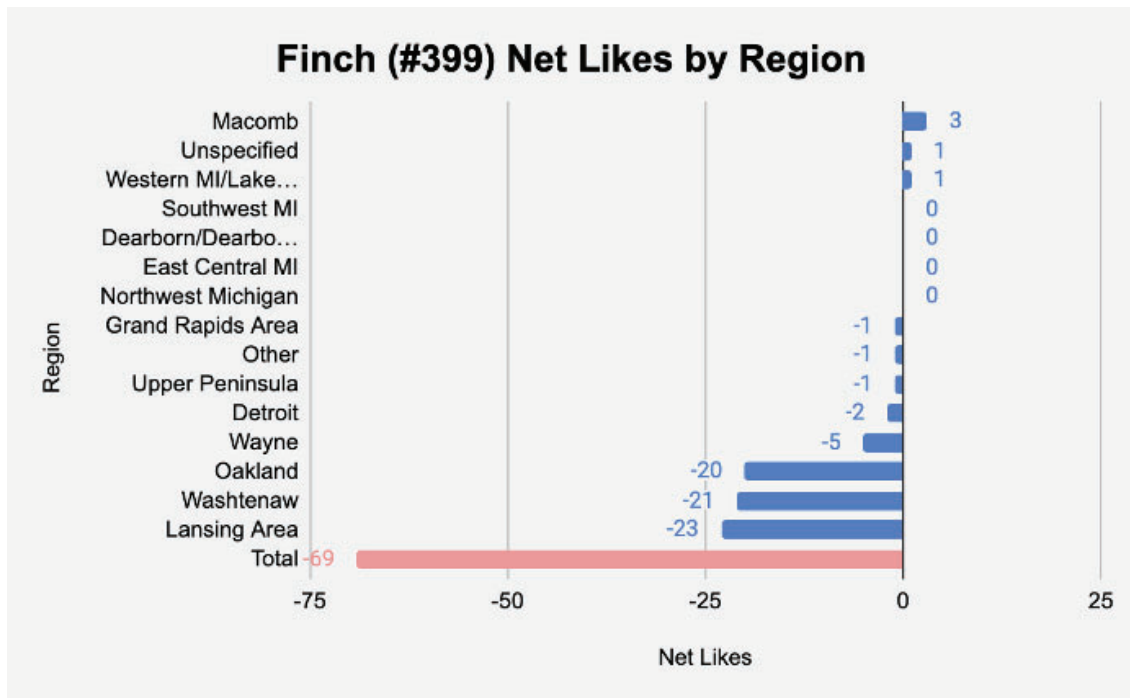


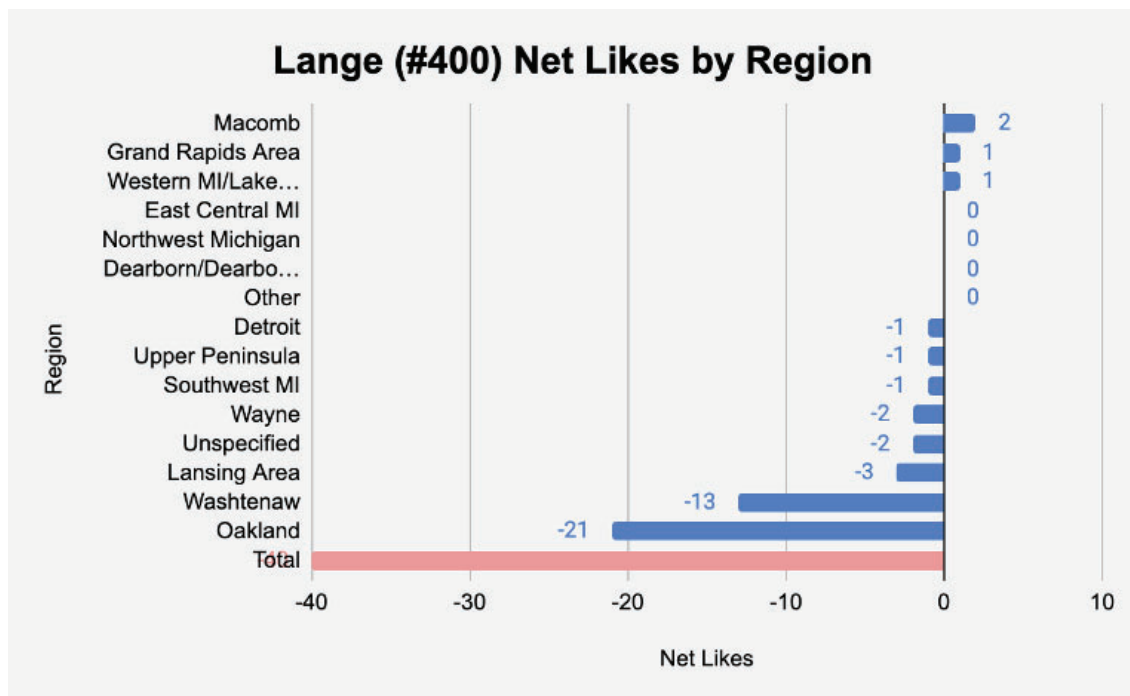
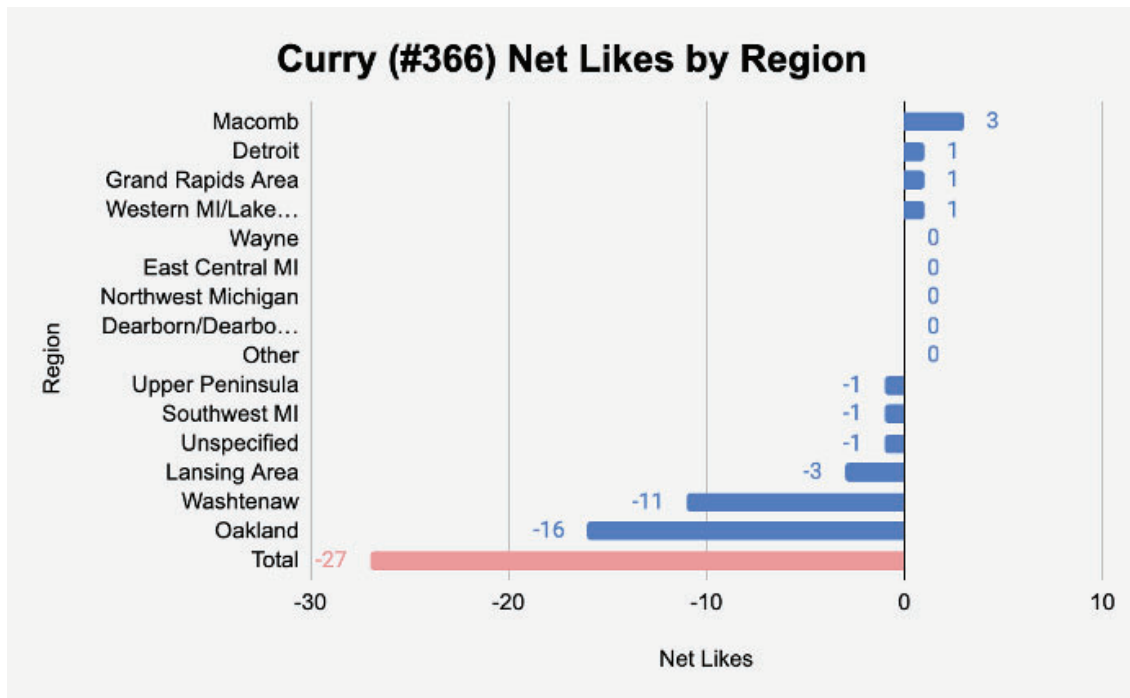


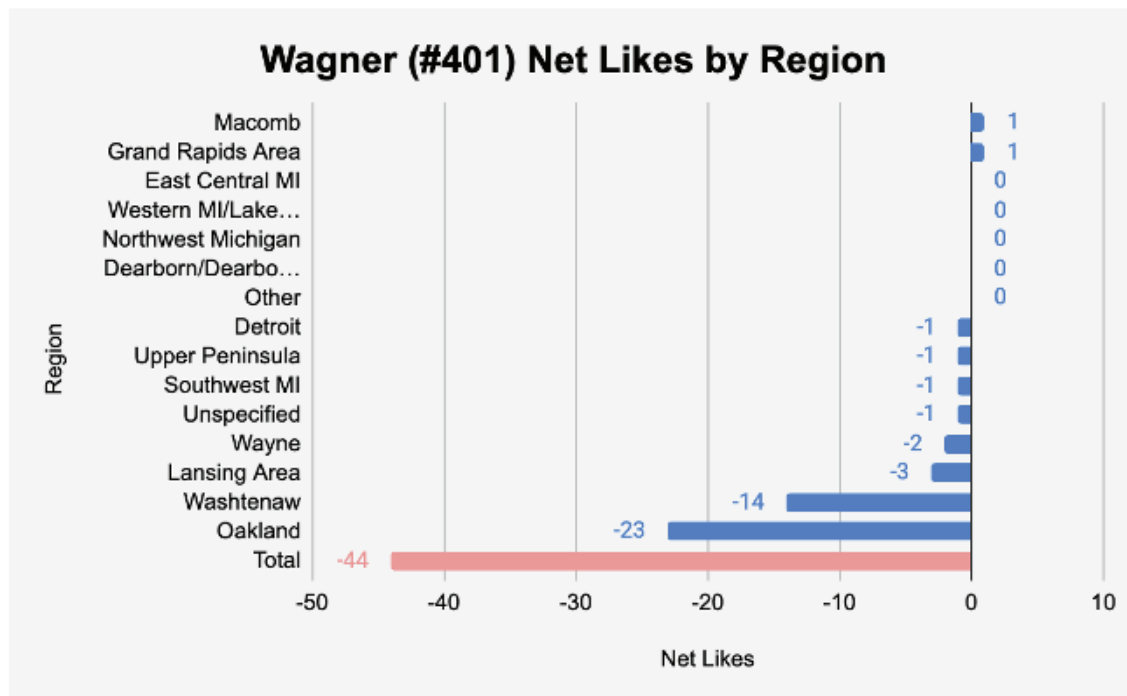
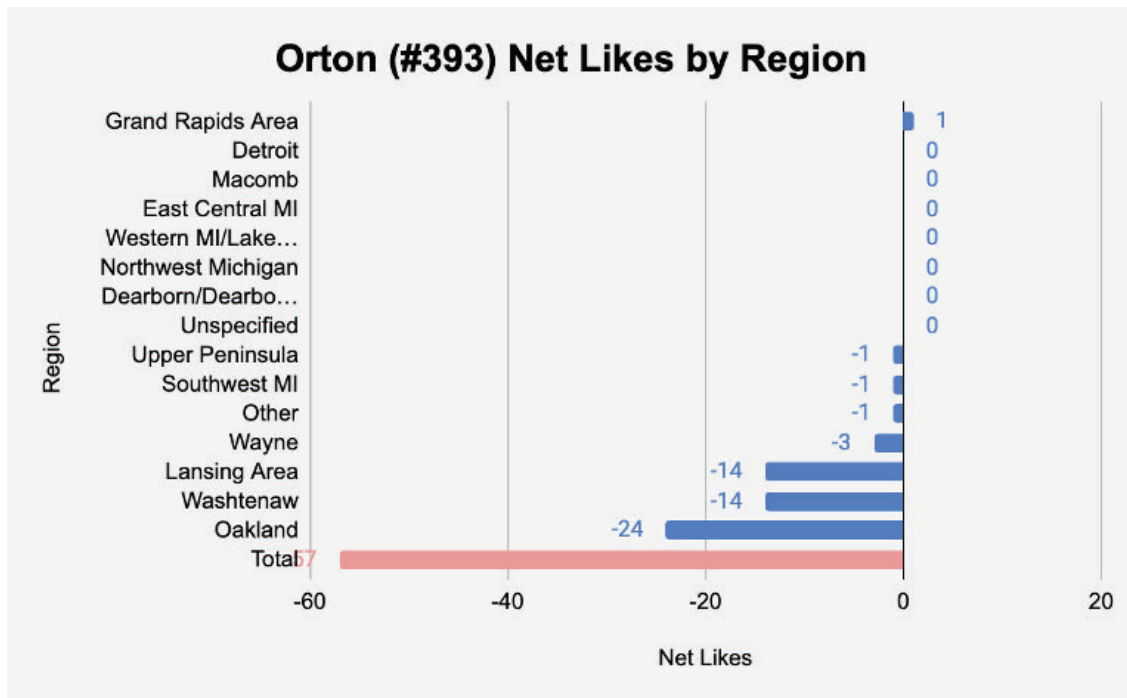


The regional net favorability ratings for the remaining eight maps.











Funding for the project has been provided by the Michigan Independent Citizens Redistricting Commission (MICRC), in addition to CLOSUP's own funds.

The analysis presented here represents the views of the authors. It does not necessarily reflect the views of the University of Michigan or the Michigan Independent Citizens Redistricting Commission (MICRC).

MICRC Commissioners

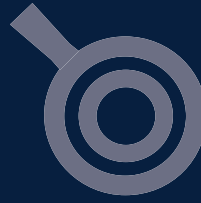
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Michigan Independent Citizens Redistricting Commission (MICRC) Memo #3 — Recommendations for Managing and Analyzing Public Input in Future Rounds of Michigan Redistricting

By Elizabeth Gelman, Danielle Hamer, Edward Plaut, and Tom Ivacko

September 2024

Executive Summary

This memo provides a comprehensive analysis of the CLOSUP team's work in assisting the Michigan Independent Citizens Redistricting Commission (MICRC) in the analysis of public comments submitted during the 2024 Senate Mapping Redistricting process. The goal of this memo is to detail the public comment process and provide recommendations for managing and analyzing public input for future iterations of the CLOSUP team and the MICRC. Given the lack of research on independent redistricting commissions like the MICRC, this memo likewise can provide key insights for academics and other states on the best practices for organizing and analyzing public comments in redistricting.

The memo first provides background on the MICRC, outlining research on the best practices for public engagement and incorporating Communities of Interest (COIs) into redistricting. Next, the memo describes the team's process in collecting, coding, and analyzing the thousands of public comments it received in May and June 2024. At the request of the MICRC, the team prepared two memos. [The first memo](#) analyzed the relevant COIs described in public comments to assist the MICRC in preparing their draft maps. After the MICRC completed twelve draft maps for further public commentary, [the second memo](#) analyzed the net public support for each of the maps.

Finally, this memo provides the CLOSUP team's reflections and recommendations for the future. In general, the team recommends the MICRC remain committed to its "bottom-up," community-driven approach to public comments and COIs. Based on the limited research into redistricting commissions, this approach is the most effective means of incorporating public comments into district lines. In order to support the commission, future aides should 1) build a flexible codebook that can adequately capture trends and summarize public comments, 2) utilize AI with active human oversight and review, or other mass data techniques, to efficiently and accurately assess comments, and 3) report on the data throughout the process.

Key Takeaways

- The CLOSUP team analyzed public comments for the Michigan Independent Citizens Redistricting Commission (MICRC) during the May and June 2024 state senate redistricting process. The team prepared two memos for the MICRC:
 - » [Memo 1](#) presented relevant communities of interest (COIs) in Metro Detroit
 - » [Memo 2](#) analyzed the "net-favorability" of the 12 draft Senate maps
- The four-person team (three analysts and a liaison to the commission) had two steps for each memo: (1) comment collection/aggregation and (2) comment analysis
 - » Comment collection required aggregating and sorting comments from the MICRC's two online portals and from meeting transcripts
 - » Comment analysis required "coding" the comments into common themes, analyzing their frequency, and presenting relevant takeaways and data trends
- Most effective comment analysis strategies
 - » Solicit Word document versions of meeting transcripts from MICRC
 - » Divide comments for review, flagging unclear comments for secondary review
 - » Create unique IDs for individual commenters
 - » Use AI early with human oversight for a more consistent means of coding comments
 - » Meet weekly to discuss trends and update codebook as necessary
- Future recommendations for MICRC and CLOSUP team
 - » Adhere to thematic, bottom-up COI and public input philosophy
 - » Build and update a flexible and responsive codebook for public comments
 - » Leverage artificial intelligence with human oversight for demanding datasets

Background

Michigan Moves to Incorporate Public Input into Redistricting Processes

In 2018, Michigan voters approved a constitutional amendment via statewide ballot initiative that shifted the responsibility for drawing Michigan's congressional and state legislative districts from the Michigan Legislature to a newly-formed Michigan Independent Citizens Redistricting Commission. This marked a new approach to redistricting in the state, maximizing public input and, for the first time in Michigan, incorporating communities of interest. Beginning in 2020, the bipartisan commission solicited public comments before drawing Michigan's districts.

The Commission adopted its first set of maps in December, 2021, which were used in the 2022 election. However, in late 2023, a federal court ordered the commission to redraw 13 Detroit-area districts (many of which included portions of Wayne, Oakland, and Macomb counties) after finding they used race as a predominant factor while redistricting, which violates the 14th Amendment.¹ In May 2024, the Commission hired a team of researchers at the Center for Local, State, and Urban Policy (CLOSUP) at the University of Michigan to support the redrawing process by systematically aggregating, managing, analyzing, and presenting findings on the extensive public comments submitted to the MICRC.

The following memo uses this case study to highlight recommendations on collecting, analyzing, and reporting on public comment for future independent redistricting commissions.

Best Practices in Public Engagement

To ground the recommendations and case study, the CLOSUP team examined best practices for public engagement in state and local governments. While the team initially hoped to find specific recommendations for public comment data collection and analysis in redistricting, this research was limited. Therefore, the team pulled best practices from general public engagement. This research reveals a focus on fostering transparency, inclusivity, accessibility, and responsiveness.

Involve the Public Early. Government agencies should involve the public early in the decision-making process, before plans are fully finalized. This early involvement allows community input to be genuinely integrated into decisions and provides ample time for community members to engage.² Building and maintaining continuous relationships with the community—rather than only during specific projects—is especially effective.

Offer Diverse Opportunities for Engagement. To gather public comments, it is important to offer a variety of in-person and online engagement opportunities, such as town halls, virtual meetings, open houses, forums, email, and online portals. Live meetings should be scheduled at different times (daytime, evenings, weekends) and held in various locations (or virtually) to accommodate diverse schedules and access to technology.

Provide Context for Effective Feedback. Providing background information and context is essential to help participants fully understand the issues under discussion. This can be done through materials like videos or FAQs that explain what types of comments will be most valuable to the decision-making process.³ These resources can also offer general information on the public comment process and how submitted feedback will be considered.

Ensure Transparent Communication and Outcome Reporting. Clear communication about how decisions are made, who is responsible, and the influence of public input on outcomes is crucial. Engagement results should be well-documented and shared publicly, including details on what was said, what was decided, and why. For example, if

certain comments are classified as repetitive, mass-produced, or computer-generated, this should be transparently reported in the analysis.⁴

Leverage Technology. Utilizing technology for broad outreach, data collection, and analysis is essential. The Administrative Conference of the United States (ACUS) recommends that staff be trained on new technologies for processing large volumes of comments. These technologies can expand opportunities for public participation and lower barriers to accessing public comment portals, allowing a more diverse and representative group of people to engage. Additionally, technology can assist in analyzing large datasets of public input and identifying automated or computer-generated comments.

Implement Regular Evaluation and Improvements. Finally, it's important to regularly evaluate the effectiveness of engagement efforts. Gathering feedback from participants on the engagement process itself can reveal areas for improvement. Government agencies should also track participation rates, demographic diversity, and satisfaction levels to ensure ongoing improvement. Based on these evaluations, strategies should be adapted as needed.

The MICRC case study proves as a knowledge source for governments of how these best practices in public engagement can be expanded upon for public comment analysis for independent redistricting commissions.

Approaches From Other Commissions on Redistricting

Although there are few truly independent redistricting commissions like the MICRC, the CLOSUP team surveyed the approaches of other commissions when incorporating COIs into their redistricting processes. There is limited research on this topic: only a handful of academic articles have appraised how commissions solicit and incorporate feedback into their mapping. Moreover, there is no research on the kind of work undertaken by the CLOSUP team of organizing and “coding” public comments for commission use. Nonetheless, it is worthwhile to study what we can from other states handling a similar criterion.⁶

What is a Community of Interest?

Communities of interest are a malleable concept in every state that recognizes them. Generally, incorporating COIs is intended to ensure that legislatures actually reflect the heterogeneous policy interests of diverse voters. The most coherent legal definition of COIs comes from Professor Nicholas Stephanopoulos's concept of a territorial community: “(1) a geographically defined group of people who (2) share similar social, cultural, and economic interests and (3) believe they are part of the same coherent entity.”⁷ CLOSUP's 2020 recommendations to the MICRC further suggested that, for the purposes of redistricting, COIs should be associated with public policy interests that can be affected by legislation.⁸ The Alaskan Supreme Court recently adopted Stephanopoulos's definition of COIs as part of its decision to outlaw partisan gerrymandering under the Alaskan Constitution.⁹ Precisely what is required to meet this and other local definitions of COIs is unclear. However, the Supreme Court has recognized as recently as 2023 that poorly supported, pretextual COIs will be subject to legal scrutiny.¹⁰

How States and Commissions Handle COIs

Given that COIs are highly contextual, states typically leave local definitions open-ended. Instead of setting specific definitional requirements, states that use the criterion will merely determine a final arbiter of legitimate COIs. As the MICRC did, some states undertake a “bottom-up” approach, where the communities themselves self-identify

to the relevant redistricting officials.¹¹ Others use a “top-down” approach, in which the redistricting officials, typically legislators, make decisions on qualifying and relevant COIs.¹²

California, the state with a commission most similar to the MICRC, uses a bottom-up approach. California’s Citizens Redistricting Commission (CCRC) solicits extensive public comment through its online portal and its large support staff.¹³ The CCRC relied on its staff to work through the many thousands of public comments it received, allowing the CCRC to effectively read every individual comment. Moreover, the CCRC continued to provide in-person and remote hearings for public commenters, often allowing community representatives to demonstrate their COIs over Zoom.¹⁴ Other states that utilize bottom-up approaches to redistricting (but do not have independent commissions) similarly use Zoom and public comment portals to solicit public feedback.¹⁵

Michigan’s 2018 constitutional amendment specifies that COIs are not the same as local government jurisdictions (e.g. cities, counties, etc.), and it requires the MICRC to prioritize COIs above protections for local jurisdictions. By comparison, a number of state commissions, including California’s, are different from the MICRC in a fundamental way: their constitutional or statutory criteria allow jurisdictional lines (city limits, county lines, etc.) either 1) to be used as a stand-in for a COI or 2) to be considered at the same level of priority as a COI. In California’s case, per limited research on the topic, the equal standing of jurisdictional lines to COIs caused some confusion among the commission, as it became difficult to distinguish the two distinct yet equal criterion.¹⁶ However, unlike the MICRC’s constitutional criteria, the CCRC was not constitutionally required to place COIs higher than jurisdictional considerations.

Among other states with independent redistricting commissions, Arizona’s process for incorporating COIs appears to be the most top-down and commissioner-driven. Arizona’s redistricting process is fundamentally different from the MICRC’s or CCRC’s, as commissioners work through a “grid-like pattern” of pre-set, introductory district boundaries, making adjustments to that grid based on relevant redistricting criteria (COIs included).¹⁷ District boundaries are the result of adjustment of equally populous districts, not original drawing. Based on a sampling of transcripts, commissioners appear to drive the COI process without the specific support of public comment.¹⁸ Although there is no specific research into the Arizona commissions approach, its top-down COI process appears more ad-hoc compared with the bottom-up approaches in Michigan and California.

Case Study: CLOSUP and MICRC

CLOSUP Team Approach

In May 2024, the MICRC engaged the CLOSUP team in their redistricting process to ensure a thorough and objective examination of public comments, facilitating the Commission's efforts to incorporate community feedback into the redistricting process. Given the substantial volume of public comments received, the short timeline available for the Commission's re-mapping work, and the time required to employ effective collection and summarization strategies, the team's role was critical, as the Commission could not feasibly undertake this task independently.

After initial communication with the Commission leadership, the CLOSUP team worked independently to conduct analyses in two distinct phases. MICRC leadership requested focus on communities of interest first, and then a specific focus on map preferences based on public feedback for the Commission's twelve draft maps. In each phase, the team compiled comments from various sources—including in-person and Zoom public meetings, emails, letters, and online portals—into a single comprehensive database. This allowed for a comprehensive and systematic analysis of patterns and trends in public opinion. The team then produced detailed memos summarizing their findings and presented these during public MICRC meetings.

This process was not intended to influence Commission members towards a specific outcome or "correct map," but rather to ensure that the entirety of public opinion data was accessible and available to Commission members. The CLOSUP team's memos were designed to help the commission see the larger picture and make decisions informed by qualitative data. During presentations, members of the public and MICRC commissioners had the opportunity to ask questions, fostering a deeper understanding of the analyzed data and its implications for the redistricting process.

Methodology

The CLOSUP team developed and employed a detailed coding methodology to analyze public comments across two phases of the redistricting process, documented in two separate memos delivered to the MICRC. This section outlines the methodologies used in each phase and their integration to provide a comprehensive analysis.

Memo 1: Initial Comment Collection and Coding

The CLOSUP team analyzed 217 public comments from 103 individuals submitted between March 21 and May 14, 2024, on the proposed redistricting maps for Wayne, Oakland, and Macomb Counties. The CLOSUP team aggregated public comments from three sources: MICRC meetings, the Michigan Mapping Public Comment Portal, and the My Districting Mapping Portal. Each comment was added to a database, capturing details such as the date of testimony, location, commenter's name and residence (if provided), and whether the commenter represented themselves or a group. Unique Commenter ID codes were assigned to track multiple submissions by a single commenter. The comments were coded using the CLOSUP codebook (available in full in the [Memo 1 Appendix¹⁹](#)), which contained five categories of codes to represent the public comments: (1) the commenter's home region; (2) community of interest (COI); (3) procedural mapping comments; (4) substantive mapping comments; and (5) miscellaneous comment categories. The team used the existing codebook from earlier student drafts built during the MICRC's original 2020–21 redistricting cycle and updated it with new codes where necessary. Most comments were assigned several codes to reflect the multiple requests and insights of the comment. For example, a comment from a Dearborn resident might argue that they are part of a Middle Eastern and North African (MENA) COI and ask the Commission

to keep Dearborn and their COI whole (within a single district) in the map. This comment would receive codes 113 (Dearborn/Dearborn Heights region), 201 (MENA COI), 410 (prioritize keeping COI whole), and 411 (prioritize keeping jurisdiction whole).

The team focused in particular on comments with codes 406 (concern that maps mishandle jurisdiction boundaries), 407 (concern that maps mishandle COIs), 410 (prioritize keeping a COI whole), and 411 (prioritize keeping jurisdictions whole). Although the MICRC constitutional criteria places COIs much higher than jurisdictional boundaries, many commenters articulated their COIs in terms of their jurisdiction, thus introducing some of the same challenges that California's Commission experienced. As such, the team re-reviewed comments with these codes and analyzed the testimony for recurring themes. For the purposes of analyzing, writing, and presenting the memo, the team split the comments internally based on the three major counties at issue in the redistricting: Wayne, Oakland, and Macomb.

The University of Michigan GPT AI service was used to initially analyze and assign codes. First, the team created succinct summary sentences for each public comment ("Keep Detroit and Warren separate because of infrastructure" or, "Keep Detroit together to prevent diluting the vote and disenfranchisement.") to provide the U-M AI clear, consistent data. Second, the team asked the AI a series of prompts in order to summarize those sentences. Information extracted from U-M GPT was subsequently cross referenced in the public comment database by members of the CLOSUP team to verify the accuracy of the AI's output. Although the team members hand-coded every comment in the database, there were simply too many comments to offer an unbiased and complete analysis of the feedback. Nonetheless, the team made necessary corrections to the AI's responses summarizing the map preference trends in the below map-specific findings.²⁰

Memo 2: Map Preference Coding

In the second report to the MICRC, the CLOSUP team analyzed 1,463 public comments from 415 individuals submitted between May 21 and June 21, 2024 on the twelve proposed state senate maps for Wayne, Oakland, and Macomb Counties. The CLOSUP team followed the same coding methodology as it did in its May memo, with an updated codebook category to analyze respondents' specific draft map preferences. In the CLOSUP codebook, each of the twelve draft maps was assigned a "600" series code, with decimal subcodes indicating support (6xx.1), opposition (6xx.2), or suggested modifications (6xx.3). For example, support for the "Szetela map" was coded as 611.1, while opposition to the "Dove map" was coded as 603.2. The team calculated each map's net favorability by subtracting unique dislikes from unique likes, ensuring each individual commenter could only affect a map's count once.

The University of Michigan GPT AI service was again used to synthesize broad trends specific to each map once these comments were summarized. Similarly to its methodology for [Memo 1](#), the CLOSUP team provided a human review to confirm and modify as needed the AI's findings.

Another updated feature of [the second memo](#) included a regional analysis. The CLOSUP team analyzed the relationship between commenters' locations and their mapping preferences, providing a regional breakdown of preference for each individual map.

By combining these methodologies in two separate phases and incorporating all public comments across their multiple input paths, the CLOSUP team provided a comprehensive analysis of public sentiment regarding both the redistricting process and specific map preferences. The initial phase focused on thematic content (especially COIs) and jurisdictional concerns, while the second phase quantified support for draft maps. Together, these approaches

allowed for a nuanced understanding of public input, ensuring both qualitative insights and quantitative preferences were accurately represented in the final analysis.

Key Public Concerns

This section presents broad insights about public concerns derived from the CLOSUP team's examination of public comments submitted to the MICRC. For a more detailed exploration of CLOSUP's findings, please refer to [Memo 1](#) and [Memo 2](#).

Jurisdictional Integrity: Keeping jurisdictions whole emerged as a top priority for commenters across both phases. Again, this somewhat replicates the California experience. Public comments frequently cited the townships, counties, and neighborhoods in which they lived, worked, and spent time in as communities that should be kept together. Many commenters articulated their communities of interest (COIs) in terms of their jurisdictions, highlighting the interconnectedness of these concerns. It is unclear if this pattern will continue in future rounds of redistricting, or whether more experience with the still-new concept of COIs in Michigan will eventually lead to more nuanced definitions of COIs that may cross jurisdictional boundaries.

Communities of Interest (COIs): Preserving COIs, particularly ethnic and cultural communities, was consistently emphasized throughout both phases of public comments. COIs mentioned were wide-ranging in definition, including but not limited to:

- Racial and ethnic minority groups (for example, Middle Eastern and North African (MENA) community)
- LGBTQ community
- Environmentally-focused watershed communities
- Religious groups
- Economic and industry-based communities

In the second phase of public comments, many respondents voiced specific concerns about maps diluting the voice of a COI or expressed support for maps they believed preserved important COIs.

Partisan Fairness: This became the most prominent concern in the second phase of public input from May 21 through June 24, with commenters advocating for competitive districts (despite this not being a criterion in the constitutional amendment), statewide partisan fairness, and transparent metrics. Many advocated for maps solely on the grounds of high partisan fairness scores, metrics based on redistricting criteria provided by MICRC.²¹ Some commenters perceived a conflict between incorporating COI concerns and achieving partisan fairness.

Procedural Concerns: Throughout both phases, commenters raised issues relating to the redistricting process itself:

- Transparency in the Commission's decision-making process
- Adherence to constitutional criteria for redistricting²²
- Concerns about potential advocacy campaigns influencing public comment

Process Reflections

Throughout the extensive process of aggregating, analyzing, and presenting public comments, the CLOSUP team maintained a rigorous and collaborative approach. The team met weekly, and often more frequently, to discuss coding strategies, identify emerging trends, and refine analytical methods. This regular cadence allowed for a continuous improvement of methodology. The three analysts divided the workload, each taking responsibility for specific sets of comments and drafting distinct sections of the memo. Individual public comments were frequently reviewed by two or even all three of the analysts, as needed. The team then reconvened to review, refine, and integrate their individual contributions, ensuring a cohesive and comprehensive final product.

Public Engagement and Data Collection

- The CLOSUP team analyzed a total of 1,680 public comments across two phases (217 in the first phase and 1,463 in the second phase) from 518 unique commenters, addressing 5,093 specific points. Public participation increased significantly between the two phases, with the number of unique commenters rising from 103 to 415.
- Multiple submission channels were used, including MICRC meetings, online portals, and written communications, with in-person meetings generating the most comments.
- The team prioritized neutrality in coding, documenting all comments received regardless of their origin or frequency. This meant balancing input from wide-scale organizing advocacy efforts (repetitive comments) against unique, detailed explanations of COIs or district concerns. To address this, the team implemented two key strategies: (1) identifying and counting unique commenters in addition to total comments, and (2) tagging comments associated with advocacy groups to provide context for organized efforts.

Analytical Approach

- A detailed codebook was developed and refined throughout the process, allowing for consistent categorization of comments across various themes and regions.
- Leveraging a master database, the team developed Excel formulas to identify trends in comment types and commenter demographics, and creation of data visualizations to effectively communicate findings.
- An AI-assisted analysis to identify qualitative trends was followed by human verification and correction, ensuring comprehensive and accurate data interpretation.

Process Implications

- The systematic approach to data collection/aggregation and analysis proved indispensable in managing the large volume of public input, especially given the short court-imposed timeline.
- The two-phase process across the May and June reports allowed for refinement of analysis techniques and captured evolving public sentiments as the redistricting process progressed.
- Follow-up questions from commissioners during public hearings proved valuable in eliciting more specific and useful information from commenters.
- Commissioners incorporated memos and data differently. To view a complete record of their conversations, view MICRC meeting transcripts [here](#). (link?)

Recommendations for Future Public Comment Collection and Analysis

The MICRC case study, combined with best practice research and lessons from previous redistricting efforts, informs our recommendations for future redistricting commissions. These suggestions aim to enhance the accuracy and efficiency of public comment collection and incorporation, ensuring that redistricting decisions are well-informed and truly representative of public opinion. Our recommendations are designed to streamline the public input process, maximize the value of collected data, and improve transparency and accountability.

By implementing these recommendations, future redistricting commissions can better fulfill their mandate of creating fair and representative electoral maps while effectively engaging the public throughout the process.

Maintain A “Bottom-Up” COI Approach

Based on the relevant research from other independent redistricting commissions, the MICRC’s bottom-up approach is the most effective means of incorporating authentic public input and COIs into the redistricting process. A bottom-up approach is the best means to actually protect COIs and avoid ad-hoc and uneven redistricting. However, the approach is likely more resource and time-intensive compared with a top-down approach as in Arizona. The organization and review of thousands of public comments requires adequate staffing, as commissioners generally do not have the time or capacity to review and recall all of the submitted comments.

Even with a capable staff, the flood of comments requires summarizing. We recommend a memo-style, “thematic” approach to COIs: reviewing staff should 1) individually analyze and categorize each public COI comment and 2) present key trends synthesizing the most prevalent themes that emerge from the data. The approach should mirror or build upon the CLOSUP team’s May 20, 2024 COI memo, in which the CLOSUP team individually reviewed each public comment, but presented the commission with the most important trends and takeaways. This ensures a community-driven, bottom-up approach, while still ensuring that commissioners are not spending too much time wading through public comments. Organizing these comments could be expedited by using AI, but the initial review of each comment should still receive a human reviewer to ensure accuracy.

Encourage Specificity and Sufficiency in Public Comments

The most valuable public comments are those that are specific, providing succinct context and sufficient justification for their opinions. However, some comments either lack context or include an overload of information. While receiving live public comments during public hearings during the Michigan re-mapping process, MICRC Commissioners engaged commenters in follow-up questions. This was effective in eliciting deeper justifications and necessary context when needed and allowed for more accurate analysis of these public comments.

To build on this approach, commissions can implement more proactive tools. When submitting public comments, whether in-person or through an online portal, commenters should be required to complete an accompanying online form requiring more detailed information such as contact information, region, geographic boundaries of their COI, additional information regarding the substantive issues that define their COI, and reasons their COI requires legislative protection. This approach will ensure that commenters provide the necessary justification for their feedback, resulting in more consistent and valuable input.

Commissions could also consider providing example comments on their comment portals, pointing to key features of effective input, such as clarity, context, and justification. By highlighting high-quality comments, commissions can guide the public toward providing input that leads to more informed and representative redistricting decisions.

Build a Flexible and Responsive Codebook

A well-structured, adaptable codebook is critical for effectively organizing and analyzing public comments. Teams should begin with a foundational framework that includes a basic set of categories relevant to redistricting such as Region, Communities of Interest, Process, which will guide the development of specific codes. Through an iterative process, teams should allow for regular reviews and updates to these categories and codes as new themes emerge from public comments. This ensures that the codebook remains relevant and supports analysis throughout the comment collection period.

The codebook should allow for multi-level coding, capturing both broad themes and specific details. “Primary codes” can be used for general categories (the code “100” might signify “COI”) while “subcodes” provide more granular information (subcode code “106” signifies “African American COI”). To maintain flexibility, use open-ended categories and “other” options. Clear definitions and real-world examples should accompany codes (in annotations, or in the margins) to ensure consistency across multiple coders.

Leverage Artificial Intelligence with Human Oversight

Artificial intelligence (AI) tools, such as ChatGPT, can enhance the efficiency and consistency of the coding process when used judiciously. A uniform codebook serves as an excellent foundation for AI-assisted coding. By providing the AI with the codebook and feeding it comments one at a time, team members can quickly generate initial code assignments. This approach not only accelerates the coding process but also helps team members familiarize themselves with the codes, and maintain objectivity when reading comments.

However, AI should be viewed as a supportive tool rather than a replacement for human expertise. Public comments are often unique or complex, failing to fit neatly into predetermined categories. While maintaining a dynamic and expanding codebook can address this challenge, consistent human discernment is critical. Teams should implement a two-step process by which any analysis involving AI is subsequently checked over with a human review, to catch errors and misunderstandings.

Implement Transparent and Frequent Reporting

Public comments should be analyzed and presented to the commission at multiple stages throughout the redistricting process, rather than just at the conclusion of public comment collection. Aides should segment the comments into phases and produce a memo for each phase. This approach allows for the analysis to evolve in response to the changing dynamics of redistricting. CLOSUP’s two memos exemplify how the focus of the redistricting discussion shifts over time, necessitating corresponding adjustments in the analysis. Depending on the specifics of a state’s process, additional memos may be necessary. Each memo should be presented to the commission to facilitate questions and discussion.

Conclusion

As part of its ongoing effort to support Michigan communities, the MICRC should continue to refine and improve its public comment solicitation and analysis process. The most effective way to use public comments in a bottom-up redistricting approach is to use support staff to collect, categorize, and synthesize the key comment trends—the commissioners should not be expected to read through the thousands of comments alone. The MICRC can also ensure that these comments are high-quality, effective, and specific by requiring an additional form and comment examples as features of its online portal. For their part, the analysis team should be responsive to the needs of the MICRC and the actual trends that emerge from the comments. The analysis team should utilize appropriate data science management technology available to them, including AI, and be prepared to report on the data throughout the process.

A refined and effective public comment analysis is just one component of a successful redistricting process. To achieve the best outcomes, our recommendations should be paired with other practices rooted in research, particularly those that emphasize the importance of diversity and representation within commissions.

By implementing these improvements, future commissions can enhance their ability to serve their communities and ensure a more transparent, inclusive, and effective redistricting process. This approach will not only strengthen a commission's work but also foster greater public trust and engagement in the democratic process.

Notes

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10. *Allen v. Milligan*, 599 U.S. 1, 30–33 (2023).
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12. *Graham v. Thornburgh*, 207 F. Supp. 2d 1280, 1294–96 (D. Kan. 2002) (deferring to the state legislature’s determination of a community of interest where evidence demonstrates that the plan is justifiable in light of the state’s redistricting guidelines).
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14. We Draw the Lines CA, *June 10, 2021 Meeting Video*, YouTube (Mar. 6, 2023), <https://www.youtube.com/watch?v=2wDdIdWT0os>
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