To: The Michigan Independent Citizens Redistricting Commission
From: Elizabeth Gelman, Danielle Hamer, Edward Plaut, and Tom Ivacko
Date: June 24, 2024
Re: CLOSUP Public Comment Analysis - Updated COI Memo

Key Takeaways

- **Data:** 217 public comments addressing 1011 specific points from March 21 to May 21
- **Most common concerns:** 1. Keep jurisdictions whole, 2. Keep 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.

Executive Summary

The CLOSUP team analyzed 217 public comments from 103 individuals submitted 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.

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- **Macomb County:** Commenters on Macomb County expressed a desire to keep certain jurisdictions intact based on shared 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.

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 to double check the codes and correct 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 Meeting, 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 Hearing Conduct—12 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