

RAYMOND J. DAGUE, PLLC

ATTORNEYS & COUNSELORS AT LAW

472 SOUTH SALINA STREET

SUITE 620 EMPIRE BUILDING

SYRACUSE, NEW YORK 13202

TEL. 315.422.2052

DAGUELAW.COM

March 2, 2012

The Hon. Roanne L. Mann
United States Magistrate Judge
U. S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Congressional Redistricting In Upstate New York

Dear Judge Mann:

I am writing to submit my non-party comments to the New York State senate and assembly redistricting plans which are before you and upon which public comment is solicited.

As I understand the proposed maps, both the assembly plan and the senate plan lump Onondaga County (with its principal city Syracuse) into the same congressional district with Tompkins County (with its principal city Ithaca).

For generations, Tompkins County has always been part of the Southern Tier, and Onondaga County has been part of Central New York. These are natural communities with a compact focus of culture centered around these principal cities, and the surrounding area of each has always been part of each. They are served by separate television, radio and print media. For example, the Syracuse Post Standard is the principal newspaper for Central New York, and few people in the Southern Tier subscribe to it. Syracuse TV stations 3, 5 and 9 are not generally available in Southern Tier cities such as Ithaca. Likewise, the Ithaca Journal and the Binghamton newspaper are the principal newspapers for the Southern Tier. They do not circulate in Syracuse. Nor is Binghamton/Ithaca TV station 12 and the other Southern Tier TV stations able to be found in Syracuse, either on cable or by antenna (if anyone still uses antennae to get TV these days).

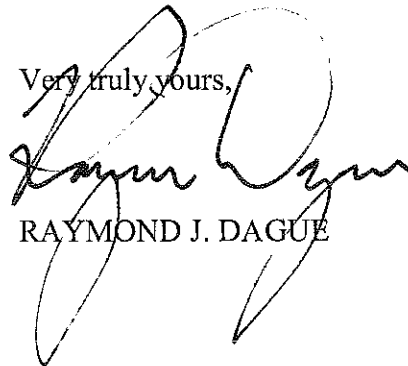
There is certainly nothing wrong with including other Central New York counties and communities such as Cayuga County, Madison County, or Wayne County in a Central New York congressional district. They are served by the Syracuse media. Also, the Southern Tier should be kept together consisting of Broome County (Binghamton), Tompkins County (Ithaca) and Chemung County (Elmira). However, it makes no sense to put a piece of Central New York such as Onondaga County in with a piece of the Southern Tier such as Tompkins County. Cortland County is generally considered part of Central New York, but that county also shares some of the characteristics of the Southern Tier, so that county could go either way.

I would urge rejection of both of these maps. The court should reconfigure what is currently the 25th congressional district (a Central New York district) so that it includes only those communities, and does not include any of the Southern Tier communities. Likewise, the Southern Tier communities should be in a district or districts which are in that region, and which do not include Central New York.

Any good student of American history knows about the bizarre dragon-shaped district which Elbridge Gerry was given around Boston to keep him in congress shortly after the founding of our nation. The Gerrymander is our modern legacy of this—districts carved up for political reasons based on the calculation of which party can win a seat, rather than districts which are based on geography, common communities, and the zones of local media coverage which exclusively serve those communities. I do not pretend to know about the communities of downstate, but here in upstate New York the communities are quite separate and distinct. Any redistricting plan should take such natural communities into consideration. The current plan submitted before you does not do so.

As such, this court should reject both of the maps which you have before you, and should retain the natural communities of Central New York and the Southern Tier in separate and distinct congressional districts.

Very truly yours,

A handwritten signature in black ink, appearing to read "Raymond J. Dague", written over the typed name below.

RAYMOND J. DAGUE

RJD/km

New York Alt Bronx:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I created an additional Hispanic majority district based in the Bronx. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. I also eliminated the old 22nd district. Below is a brief analysis for each district:

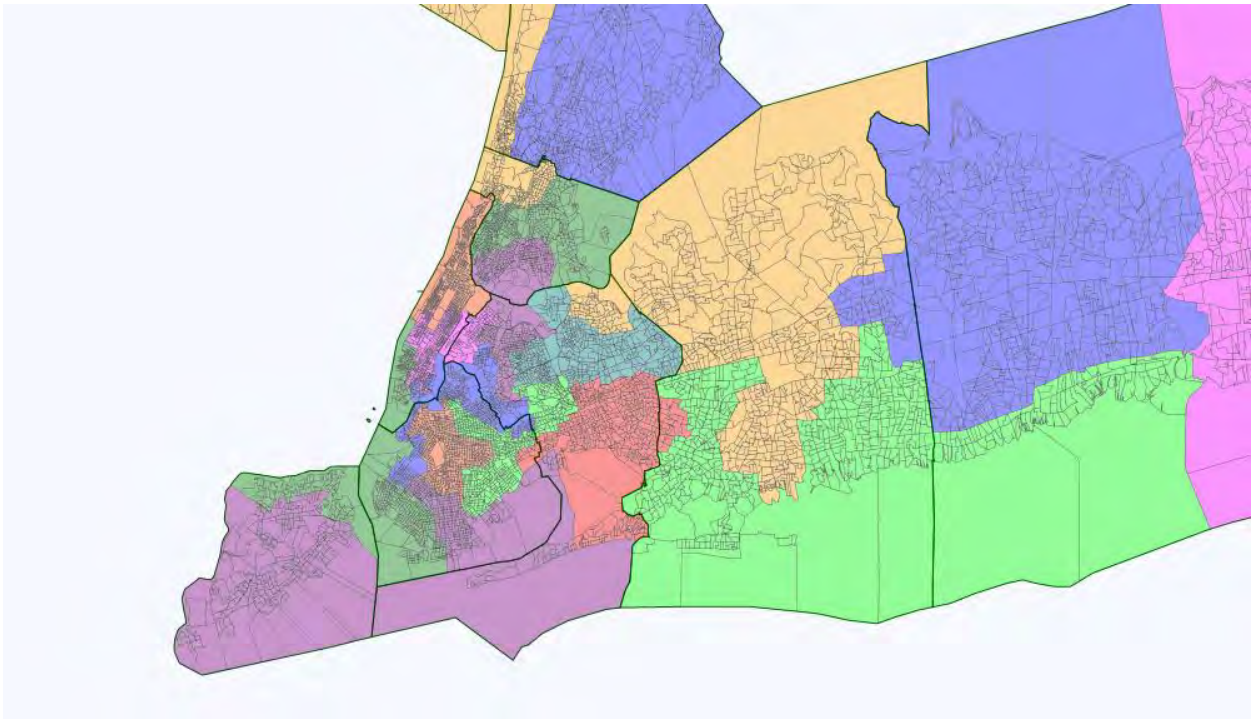
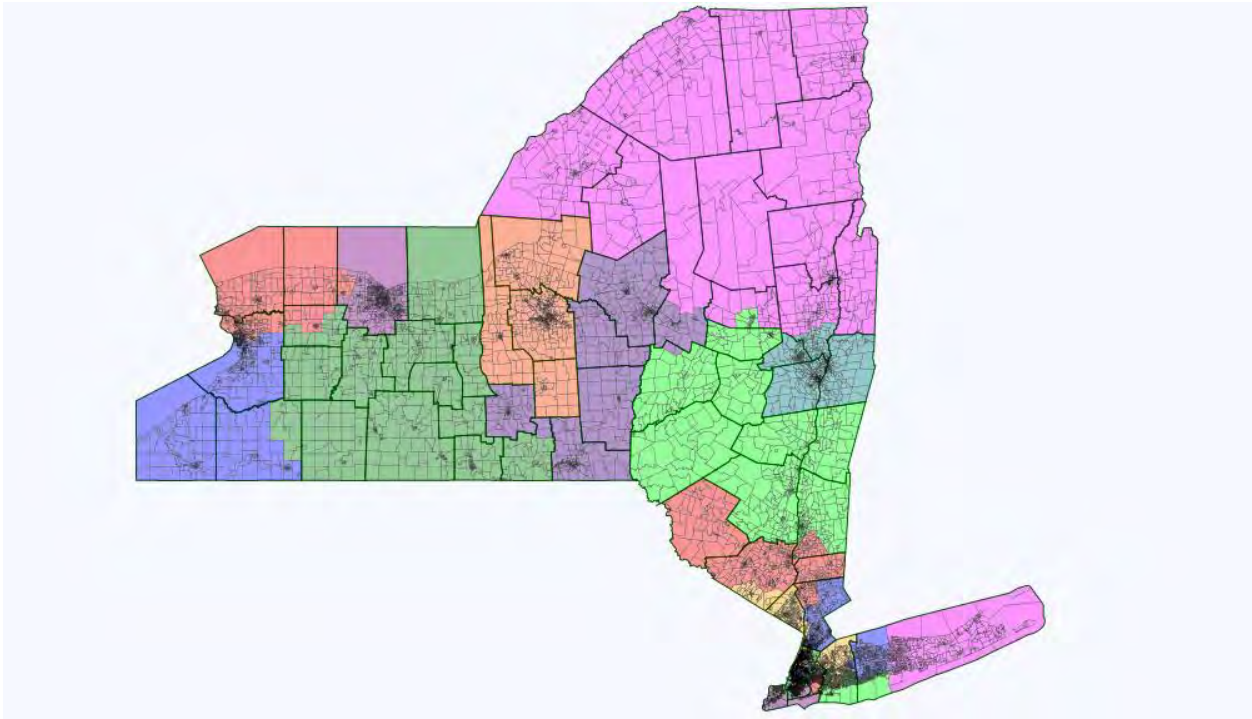
1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: By taking some of the Hispanic population out of the old 16th district, I was able to make the 7th district a Hispanic majority district that stretches from the Bronx to Queens.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. By adding parts of Staten Island, this district is only 57% white voting age population. Over time, the growing minority population will have more influence over the district. This seat is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 10th district
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 11th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 12th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: The old 16th district was made less Hispanic in order to make the 7th district Hispanic majority. This new 15th district (old 16th) is still Hispanic majority.
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to eliminate the old 22nd district. The new 19th takes in the area around Albany. It is similar to the old 20th district.
20. Teal: This is like the old 21nd district that takes in Albany and Schenectady.
21. Pink: This district takes in Watertown and the Adirondacks. It is similar to the old 23rd district.
22. Indigo: This district takes in Rome, Utica, Binghamton, and Ithaca. It is an attempt to remake the old 24th district while taking in parts of the old 22nd.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

As a resident of Legislative District 25, I would like to register my concern that the new district lines as envisioned by both the New York State Assembly and Senate do not appear fair or made with sensibility to the actual distribution of voters. I am hoping that review by this court will agree that a better approach is warranted.

With respect

Robert Geraci
8873 Dinglehole Road
Baldwinsville, New York 13027



New York Alt Staten Island:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. I also eliminated the old 22nd district. Below is a brief analysis for each district:

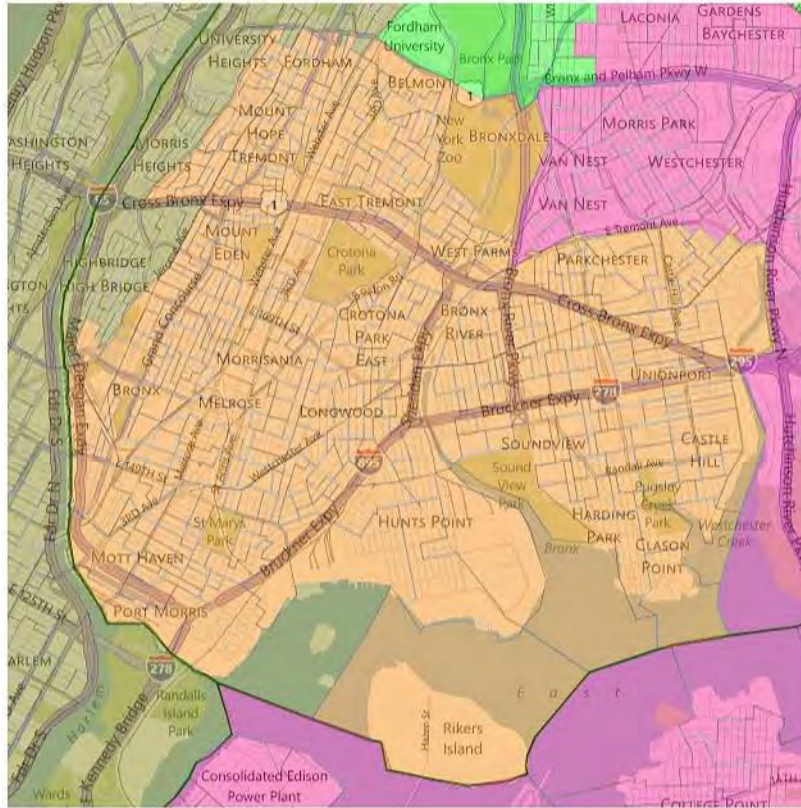
1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Brooklyn. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 10th district
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 11th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 12th district.
12. Purple: This district combines parts of the old 13th and 9th districts. It includes all of Staten Island and parts of Brooklyn.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.
19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to eliminate the old 22nd district. The new 19th takes in the area around Albany. It is similar to the old 20th district.

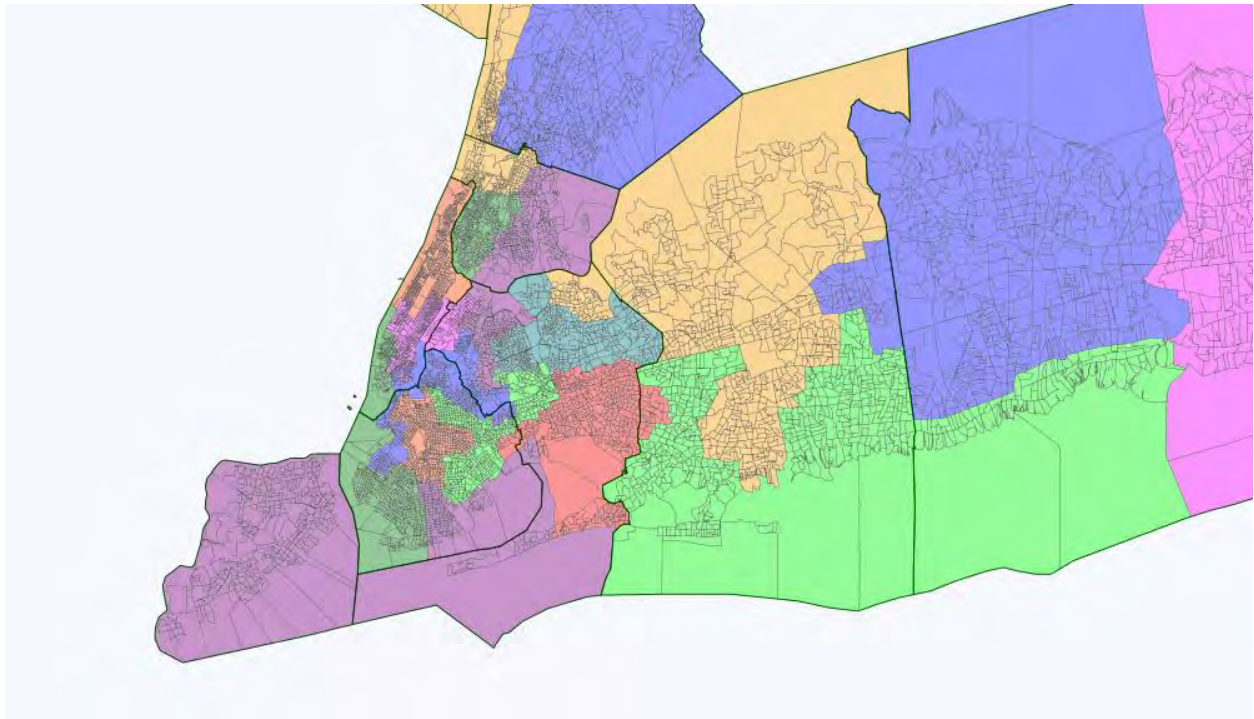
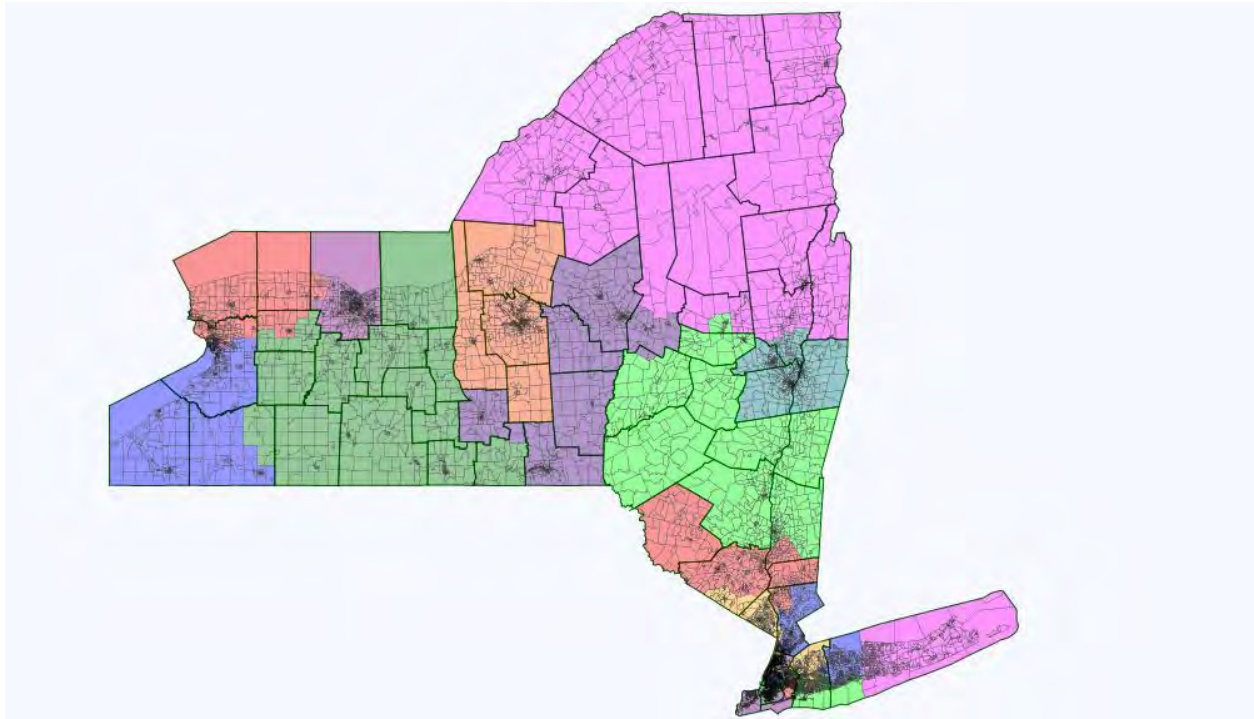
20. Teal: This is like the old 21nd district that takes in Albany and Schenectady.
21. Pink: This district takes in Watertown and the Adirondacks. It is similar to the old 23rd district.
22. Indigo: This district takes in Rome, Utica, Binghamton, and Ithaca. It is an attempt to remake the old 24th district while taking in parts of the old 22nd.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

district 15 census

district 15
former district 16

CD 15		
Total Population		
All	Pop	%
Tot	714,825	
Wh	17,027	(2.4)
Bl	212,256	(29.7)
Hisp	453,758	(63.5)
Asn	18,437	(2.6)
Nat	1,840	(0.3)
Oth	11,507	(1.6)
Voting Age Pop		
18+	Pop	%
Tot	507,994	
Wh	14,102	(2.8)
Bl	154,198	(30.4)
Hisp	316,478	(62.3)
Asn	13,856	(2.7)
Nat	1,161	(0.2)
Oth	8,199	(1.6)
President 2008		
	Votes	%
Oba	170,811	(94.2)
McC	10,078	(5.6)
Other	463	(0.3)
Avg		
	Votes	%
Dem	72,563	(95.4)
Rep	3,492	(4.6)





New York Alt Upstate:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. I also eliminated the old 22nd district. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. By adding parts of Staten Island, this district is only 57% white voting age population. Over time, the growing minority population will have more influence over the district. This seat is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 10th district
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 11th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 12th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to eliminate the old 22nd district. The new 19th takes in the area around Albany. It is similar to the old 20th district.
20. Teal: This is like the old 21nd district that takes in Albany and Schenectady.
21. Pink: This district takes in Watertown and the Adirondacks. It is similar to the old 23rd district.
22. Indigo: This district takes in Rome, Utica, Binghamton, and Ithaca. It is an attempt to remake the old 24th district while taking in parts of the old 22nd.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

Magistrate Judge Roanne L. Main:

I request that the court reject the redistricting plans proposed by both the Assembly and the Senate. The congressional districts in New York have far too long been drawn by the two political parties to ensure their electoral success rather than provide representation in the best interest of our citizens' geographic and economic needs. The issue has been addressed quite succinctly by Rep. Ann Marie Buerkle in her memorandum to the court, a portion of which follows.

Both legislative bodies have failed in their duty to agree on any kind of common-sense reapportionment in a timely manner. Redistricting, when conducted by elected officials, will always have an element of politics as each political party seeks to gain advantage: that's unavoidable. New York's redistricting has become a hyper-political process with incumbent Congressman employing lobbyists and neither party seemingly working towards the common good.

These proposed districts were not drawn based on compactness, geography, or commonality of interests, but for purely partisan reasons. In respect to the district I currently represent, these lines were produced with the intention of determining a winner of the election before the race has even begun.

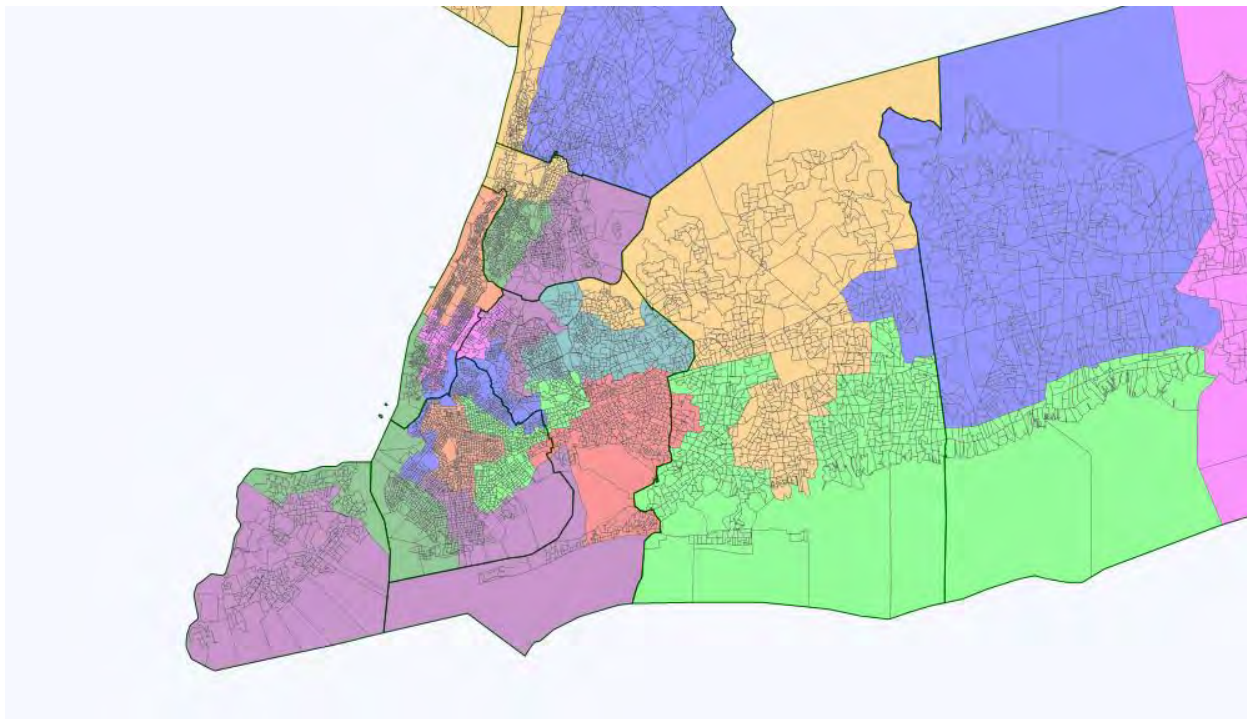
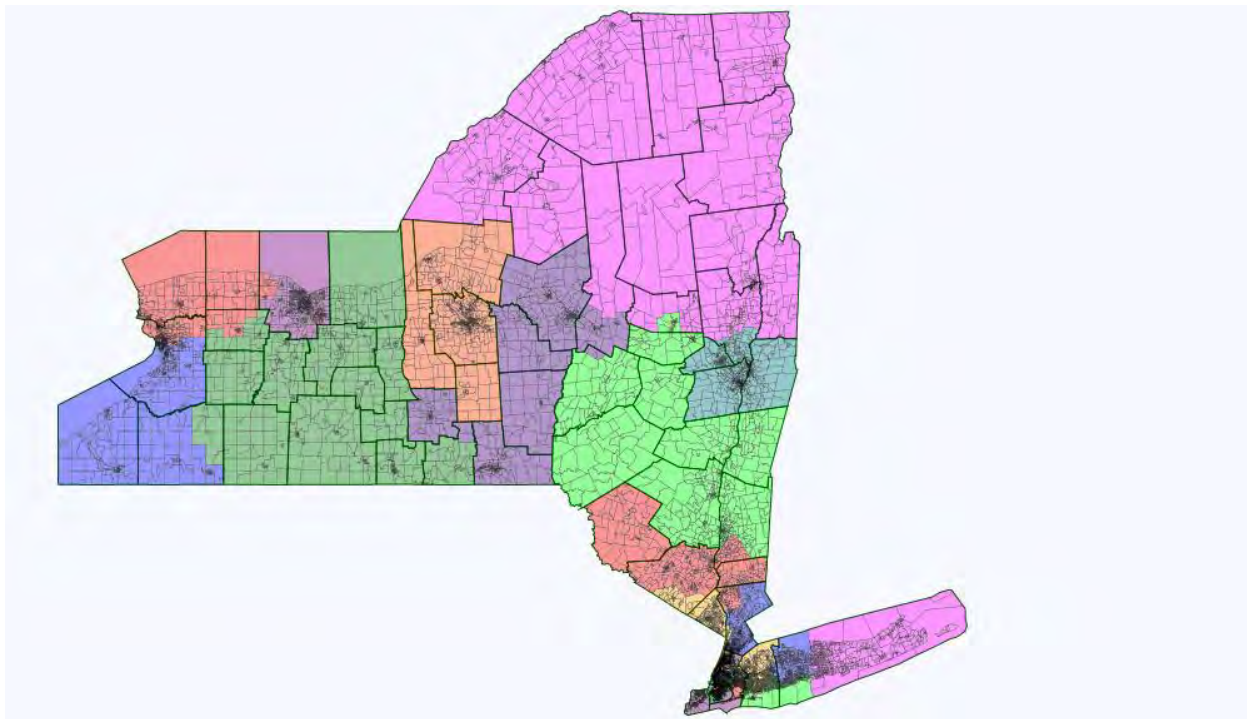
The product of over-politicized redistricting is anathema to most New Yorkers. In the political process of redistricting, Assembly and Senate members have abandoned good governance in the interest of self-preservation, political advantage and personal ambition. They appear to have been swayed by special interests and Albany lobbyists.

The redistricting plans submitted to this court by non-partisan organizations and citizens are uniformly more compact, reasonable and, frankly, set up more competitive seats in Congress, which is surely in the best interests of the people of New York and the United States. The House of Representatives is supposed to reflect the will of the people because Congressmen are required to face re-election every two years. Drawing totally safe Democrat and Republican Congressional districts has the effect of making the House a rest home for career politicians who never face a competitive election.

In the interest of good government and the fair and effective representation of New York's citizens, I respectfully urge you to set aside the obviously partisan recommendations of the Assembly and Senate in favor of a rational, commonsense plan.

Respectfully,

Michael A. Gettman



New York Clean Lines:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. In order to eliminate an upstate district, I consolidated the old 20th, 21st, 23rd, and 24th districts into 3 seats in eastern upstate New York. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. I drew this district after I had finished drawing the other NYC area districts. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 10th district
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 11th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 12th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to undo all of the gerrymandering in the area. The new 19th takes in all of Albany, Troy and the eastern border of the state.
20. Indigo: This is the old 22nd district that takes in Ithaca, Binghamton, Kingston, and Poughkeepsie.
21. Pink: This district takes in Schenectady and the northeastern corner of the state.
22. Teal: This district takes in Watertown, Rome, and Utica. It combines the areas between Albany and Syracuse.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

Redistricting Plan

Take the total number of districts and find the two closest numbers when multiplied together that equal the total number districts. For example for 16 districts it would be 4 and 4, for 12 it would be 3 and 4, for 7 it would be 7 and 1. Since New York is wider east to west then it is tall north to south draw vertical lines down the state positioned such that each section has a equal amount of people and the total number of section is equal to the larger of the two numbers. Then draw horizontal lines across the state in the same manor so that the population is evenly divided horizontally with the total number of horizontal sections equaling the lower number. The newly formed grid now defines your new congressional districts.

Since New York will have 27 districts you will have 9 vertical sections and 3 horizontal sections both positioned so that they evenly divide the population and form the new districting grid.

Thank You,

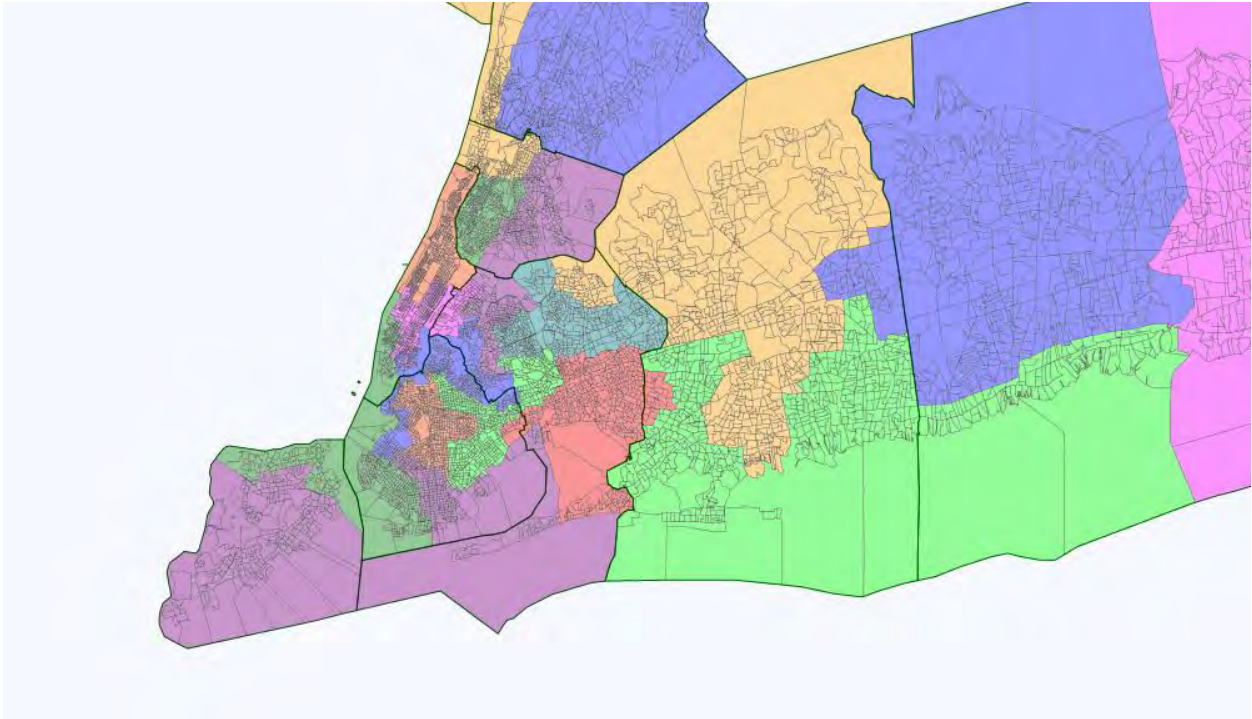
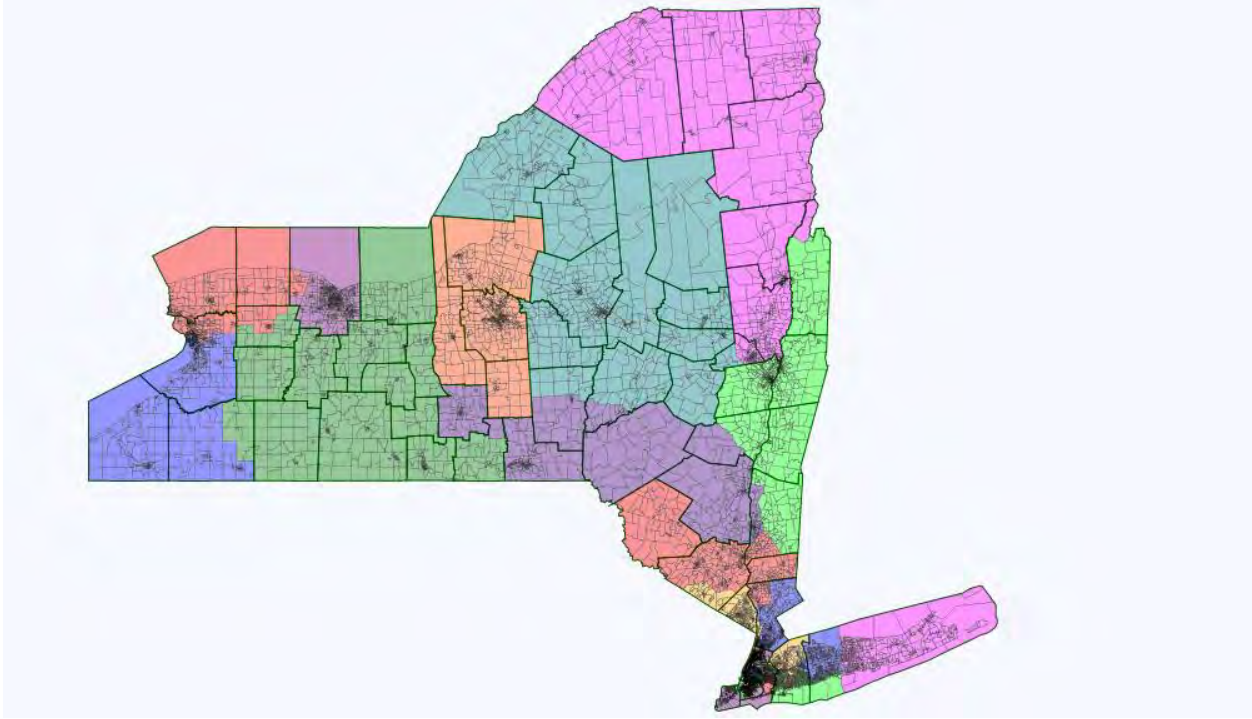
Jeff Goldberger
1394 Coach Rd.
Skaneateles, NY 13152

New York Clean Lines:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. In order to eliminate an upstate district, I consolidated the old 20th, 21st, 23rd, and 24th districts into 3 seats in eastern upstate New York. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. I drew this district after I had finished drawing the other NYC area districts. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 9th district.
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 10th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 11th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

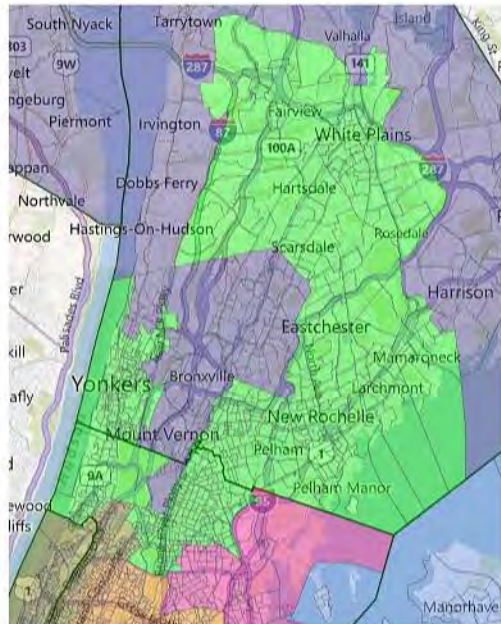
19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to undo all of the gerrymandering in the area. The new 19th takes in all of Albany, Troy and the eastern border of the state.
20. Indigo: This is the old 22nd district that takes in Ithaca, Binghamton, Kingston, and Poughkeepsie.
21. Pink: This district takes in Schenectady and the northeastern corner of the state.
22. Teal: This district takes in Watertown, Rome, and Utica. It combines the areas between Albany and Syracuse.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.



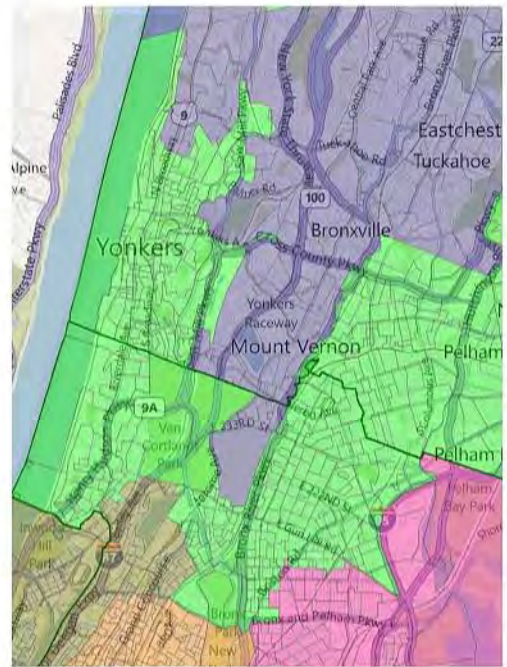
district 16 census

CD 16		
Total Population		
All	Pop	%
Tot	707,426	
Wh	222,880	(31.5)
Bl	223,657	(31.6)
Hisp	207,405	(29.3)
Asn	35,556	(5.0)
Nat	1,547	(0.2)
Oth	16,381	(2.3)
Voting Age Pop		
18+	Pop	%
Tot	535,926	
Wh	181,840	(33.9)
Bl	169,470	(31.6)
Hisp	145,193	(27.1)
Asn	27,698	(5.2)
Nat	1,070	(0.2)
Oth	10,655	(2.0)

district 16 former district 17



district 16 closeup



New York Clean Lines:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. In order to eliminate an upstate district, I consolidated the old 20th, 21st, 23rd, and 24th districts into 3 seats in eastern upstate New York. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. I drew this district after I had finished drawing the other NYC area districts. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 9th district.
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 10th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 11th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to undo all of the gerrymandering in the area. The new 19th takes in all of Albany, Troy and the eastern border of the state.
20. Indigo: This is the old 22nd district that takes in Ithaca, Binghamton, Kingston, and Poughkeepsie.
21. Pink: This district takes in Schenectady and the northeastern corner of the state.
22. Teal: This district takes in Watertown, Rome, and Utica. It combines the areas between Albany and Syracuse.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

New York Clean Lines:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. In order to eliminate an upstate district, I consolidated the old 20th, 21st, 23rd, and 24th districts into 3 seats in eastern upstate New York. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. I drew this district after I had finished drawing the other NYC area districts. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 9th district.
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 10th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 11th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to undo all of the gerrymandering in the area. The new 19th takes in all of Albany, Troy and the eastern border of the state.
20. Indigo: This is the old 22nd district that takes in Ithaca, Binghamton, Kingston, and Poughkeepsie.
21. Pink: This district takes in Schenectady and the northeastern corner of the state.
22. Teal: This district takes in Watertown, Rome, and Utica. It combines the areas between Albany and Syracuse.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

March 1, 2012

Dear New York Redistricting Commission,

Thank you for accepting public submissions for New York's Congressional redistricting. Here is my submission. I first published this redistricting plan to <http://www.dailykos.com/story/2011/05/25/978332/-Redistricting-New-York-15-1-11> in May 2011 where you can find a full summary of the districts, and some discussion in the comments. My priorities are clean coherent districts that protect communities of interest. I think having clean district lines improves the public's perception of government. In this plan every incumbent except Bob Turner has a district where they have a fighting chance at getting reelected. (I drew it before the Anthony Weiner scandal and its subsequent fallout.) Not every incumbent lives in the district I drew for them, but that's okay because the law says they don't have to. Large Upstate cities are put in the centers of their districts, except for Buffalo, which with its suburbs, gets spread over 2 districts.



Districts 1-4: Long Island

Long Island is split neatly into segments, which I think is the best way to divide it. The 4th district, in southwest Nassau, has as many black and Hispanic voters as possible, so this Long Island district has a reasonable chance at electing a minority Congressman.



Districts 5-8: Queens, Southeast Bronx, Northwest Brooklyn

The 5th district is black-dominated South Queens. Black voters aren't the majority but they still dominate this district. I think it is better to keep this district in Queens than extend it into the suburbs to draw in more black voters. The rest of Queens gets cut into segments. I felt racial gerrymandering was unnecessary here, and representatives from Queens should be able to appeal to their district's entire diverse population.

Districts 9-12: Brooklyn, Staten Island

The 2 black-majority Brooklyn districts take up a larger footprint than before. I did my best to make both of these districts more compact. The Staten Island district still crosses the Verrazano into Southwest Brooklyn. The Brooklyn part of the SI district is cleaner and more compact than before. White-majority western Brooklyn gets its own district instead of getting split up into several districts.

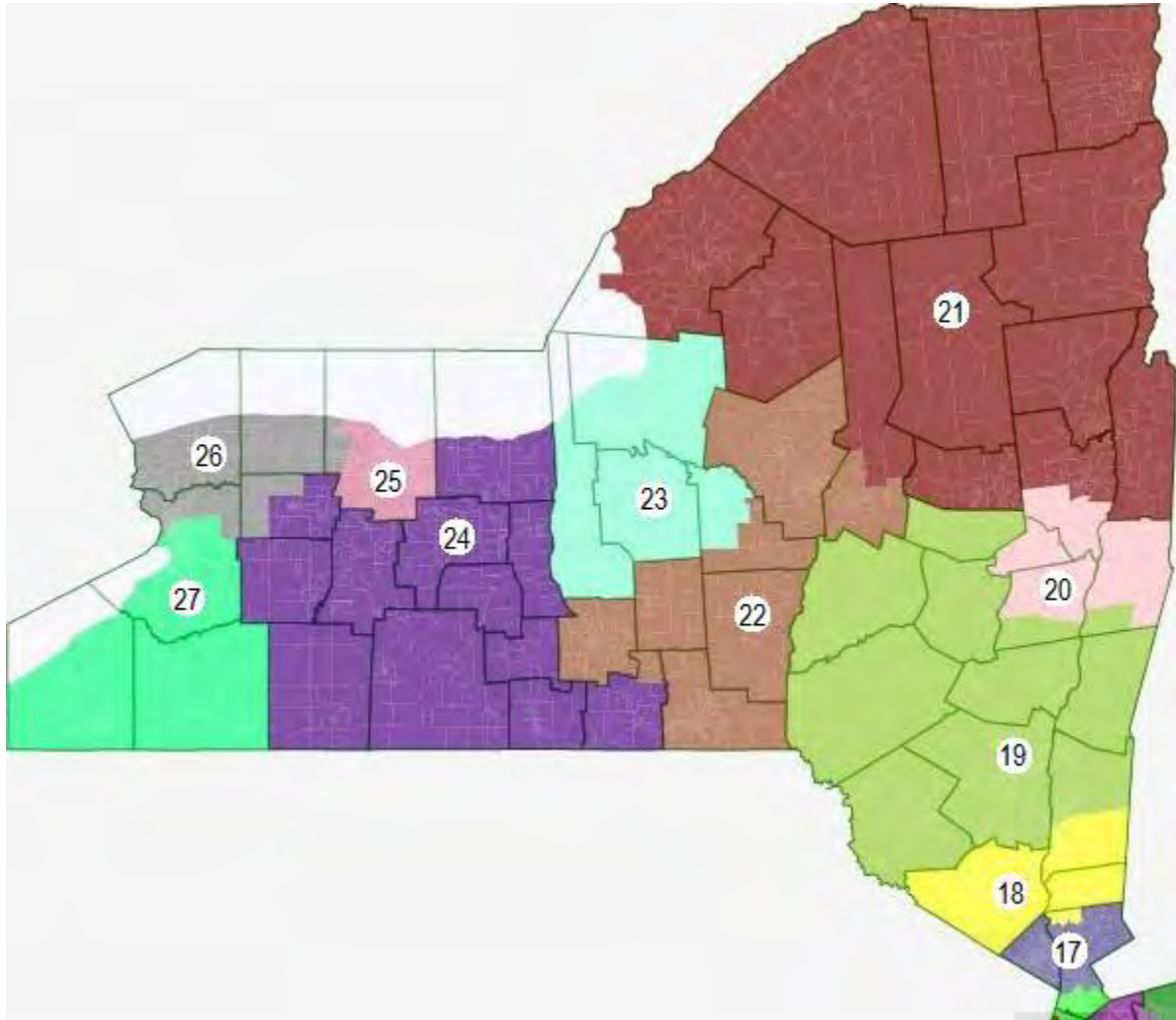
Districts 13-14: Manhattan

Instead of there being 3 districts, each one dominated by Manhattan but spread into other boroughs, now there are 2 districts entirely in Manhattan and 1 district with a piece of Manhattan but dominated by Brooklyn. This is more fair to the outer boroughs. The line between the 13th and 14th districts is around 85th Street.

Districts 15-18: Bronx and Northern Suburbs

The 15th is a Hispanic-majority South Bronx district. The 16th combines northern Bronx with southern Westchester. The 17th combines most of suburban Westchester with all of Rockland.

The 18th is a rural/suburban mix combining what's left of northern Westchester with Orange, Putnam, and southern Dutchess.



Districts 19-21: Eastern Upstate NY

The 19th is the Catskills region and the Hudson Valley from Poughkeepsie to just south of Albany. The 20th is the Albany region. The 21st is the Adirondacks/North Country region, which should be its own district.

Districts 22-23: Central NY

The 23rd is the Syracuse region, and the 22nd is everything else from Tompkins to Herkimer.

Districts 24-27: Western NY

The 24th is rural Western NY, which should be its own district. The 25th is the Rochester region, as much Monroe County as fits in a district. The 26th includes northern Buffalo and its northern suburbs, and the 27th includes southern Buffalo and its southern suburbs.

Thank you for reviewing this plan. I hope you consider using it, or any part of it. Feel free to contact me, I would love to discuss it with you.

Sincerely,
David Harrison
Cortland, NY
daveharrison84@yahoo.com

New York Clean Lines:

This map cleans up the old gerrymandered lines of the last decade. I maintained all of the VRA protected minority opportunity districts. I created an Asian plurality district entirely within Queens. I cleaned up the upstate area and Long Island districts to combine communities of interest. I decided to eliminate one downstate district and one upstate district. I eliminated the old 9th district since it is so oddly shaped and would have been difficult to maintain alongside several minority opportunity districts. I also did this to help create the Asian plurality district in Queens. In order to eliminate an upstate district, I consolidated the old 20th, 21st, 23rd, and 24th districts into 3 seats in eastern upstate New York. Below is a brief analysis for each district:

1. Pink: This district takes in all of eastern Suffolk County. Simple and straight forward.
2. Blue: This district takes in the area between Smithtown and Plainville. This seat which is similar to the old 2nd district.
3. Lime: This district stretches along the coast of Long Island from Bay Shore to Oceanside and into Franklin Square and Massapequa. This is similar to the old 3rd district.
4. Yellow: This district is contained mostly within Nassau County. It takes in Glen Cove, Great Neck, and Hempstead. This seat takes in parts of the old 4th and 5th districts.
5. Teal: This seat is a new Asian plurality district entirely within Queens. It is mostly based on the old 5th district.
6. Red: This is a black opportunity district in Queens. It is similar to the old 6th district.
7. Purple: This is a Hispanic plurality district that stretched from the Bronx to Queens. It is similar to the old 7th district.
8. Green: This district combined lower Manhattan with parts of Staten Island and Brooklyn. I drew this district after I had finished drawing the other NYC area districts. It is similar to the old 8th district.
9. Lime: This is another black opportunity district mostly in Brooklyn. This is similar to the old 9th district
10. Orange: This is the 3rd black opportunity district that is based in Brooklyn. It's like the old 10th district.
11. Blue: This is a Hispanic plurality district that stretches through Brooklyn, Queens, and Manhattan. It is similar to the old 11th district.
12. Purple: This district combines parts of the old 13th and 9th districts.
13. Pink: This is simply a remake of the old 14th district.
14. Orange: This is the Harlem based minority opportunity district (old 15th district).
15. Green: This is the Bronx based Hispanic opportunity district (old 16th district).
16. Yellow: This is just the old 17th district. I expanded it to include all of Rockland county and Warwick.
17. Blue: This is the old 18th district which was moved north to take in more of Westchester county.
18. Red: This is similar to the old 19th district. It had to move north and west. This district now takes in all of Sullivan and Putnam counties.

19. Lime: Eastern upstate New York had to lose a district. Therefore, I decided to undo all of the gerrymandering in the area. The new 19th takes in all of Albany, Troy and the eastern border of the state.
20. Indigo: This is the old 22nd district that takes in Ithaca, Binghamton, Kingston, and Poughkeepsie.
21. Pink: This district takes in Schenectady and the northeastern corner of the state.
22. Teal: This district takes in Watertown, Rome, and Utica. It combines the areas between Albany and Syracuse.
23. Orange: This is a much cleaner version of the old 25th district. It takes in 4 counties: Oswego, Onondaga, Cayuga, and Cortland. Simple and easy.
24. Red: Western New York had been gerrymandered to within an inch of its life. I cleaned it up. This new seat takes in northern Erie County and the northwestern corner of the state. It takes in parts of the old 26th and 28th district.
25. Blue: This district is a cleaner version of the old 27th district. This seat takes in all of Chautauqua County, most of Cattaraugus County, and the southern part of Erie County.
26. Purple: This district is a new seat based entirely within Monroe County. Simple and straight-forward.
27. Green: This district takes in all of the rural areas between Rochester, Buffalo, and Syracuse. It takes in parts from the old 26th and 29th districts.

Your Honor;

The maps as submitted by both the New York State Assembly and the New York State Senate for redistricting are an offense to justice and fairness. These proposed districts were not drawn based on solidity, geography, or cohesion of interests, but for purely political reasons. It is clear that these lines were created with the intention of determining a winner of the election before the race has even begun.

As a constituent of the 25th District, a New Yorker, and most importantly an American, I am disappointed in so many of my elected officials. Please your honor, do what is right and just. Lines for the new districts need to be drawn in clear fairness for all parties involved. Put politics aside and do what is honorable.

Thank you for the opportunity to be heard.

Sincerely,

Cheryl Job

318 Frenchs Bay Rd
Tully, NY 1315
Phone: 315-696-6727
Email: jobavon@yahoo.com

March 2, 2012

The Honorable Roanne L. Mann
Magistrate Judge
United States District Court
Eastern District of New York
22 Cadman Plaza East
Brooklyn, NY 11201

Dear Magistrate Judge Mann:

On behalf of the Dominican American National Roundtable (the "DANR") we respectfully submit a map for a proposed new congressional district encompassing predominantly Hispanic areas of Northern Manhattan, the West Bronx and Jackson Heights/ Corona, Queens. In this letter and consistent with your Honor's Order of February 28, 2012, we would like to set out the reasons why this Court should adopt the map as proposed by the DANR.

Essentially, there are two interconnected questions the Court needs to consider. The first is, whether, in accordance with applicable legal standards, is it appropriate to create a new congressional district connecting Spanish speaking communities in portions of these counties; second, if so, what are the appropriate contours of such a district.

To the first question, the Court already has before it a number of proposals for a district uniting these Spanish speaking communities into a new congressional district, and there should be little question that this is an idea whose time is past due. Spanish speaking communities have historically been adversely impacted by discriminatory re-districting practices, including packing and cracking designed to disenfranchise Spanish speaking voters. In addition, as the Court is aware, there has been enormous growth in the Spanish speaking communities in the referenced areas, and they are linked in large respect by a common culture as well as a common language.

The need for a new district acknowledging these characteristics has been addressed by others and we believe, need not be repeated here. Reference in this regard is made to the map proposed by the New York State Senate and in the letter from Chairman Keith Wright of this date. Rather the question for the Court is not whether such a district should be created, but what should be the contours of the district.

Page 2

To this question, we respectfully suggest that the key issue to be taken into account is what would best reflect a cognizable “community of interest”. See *Miller v. Johnson*, 515 US 900 (1995).

The District proposed by the DANR would do this. It would unite common characteristics not just of language but of culture. Moreover the communities it links are geographically contiguous, compact in the sense that 90% of the District can be traversed by the use of only three bus routes, they share places of worship, common educational institutions and public officials--- indeed, there are within the proposed District some 14 State and City Latino elected/officials (including officials of Puerto Rican, Dominican and Ecuadorian descent) more than in any other existing or proposed congressional district.

While we respect the proffer of other maps that would create districts linking the Spanish speaking communities in Northern Manhattan, the Bronx and/or Queens, we believe none is as faithful to the community of interest principles as the District proposed by the DANR, and, as a consequence, that its map is the most appropriate one for the Court to accept to ensure the Hispanic community is fairly represented in Congress.

Finally, as the Court will appreciate, the DANR and its members are analyzing on an ongoing basis the maps submitted by others in accordance with the Court’s rigorous timetable. While one other non-party has submitted a map nearly identical to the one proposed by the DANR, it appears that, for the most part, the interests of the DANR and its members have not been sufficiently represented by the current parties in this matter. DANR members may, therefore, desire to place more detailed facts before the Court. Mindful of the Court’s reluctance to accept additional intervenors, we nonetheless hope that if such intervention is sought, it will be permitted by the Court. The issues here are too important to deny the Court a full and complete analysis of all factors relevant to its ultimate decision, including, for example, the application of relevant provisions of the Voting Rights Act..

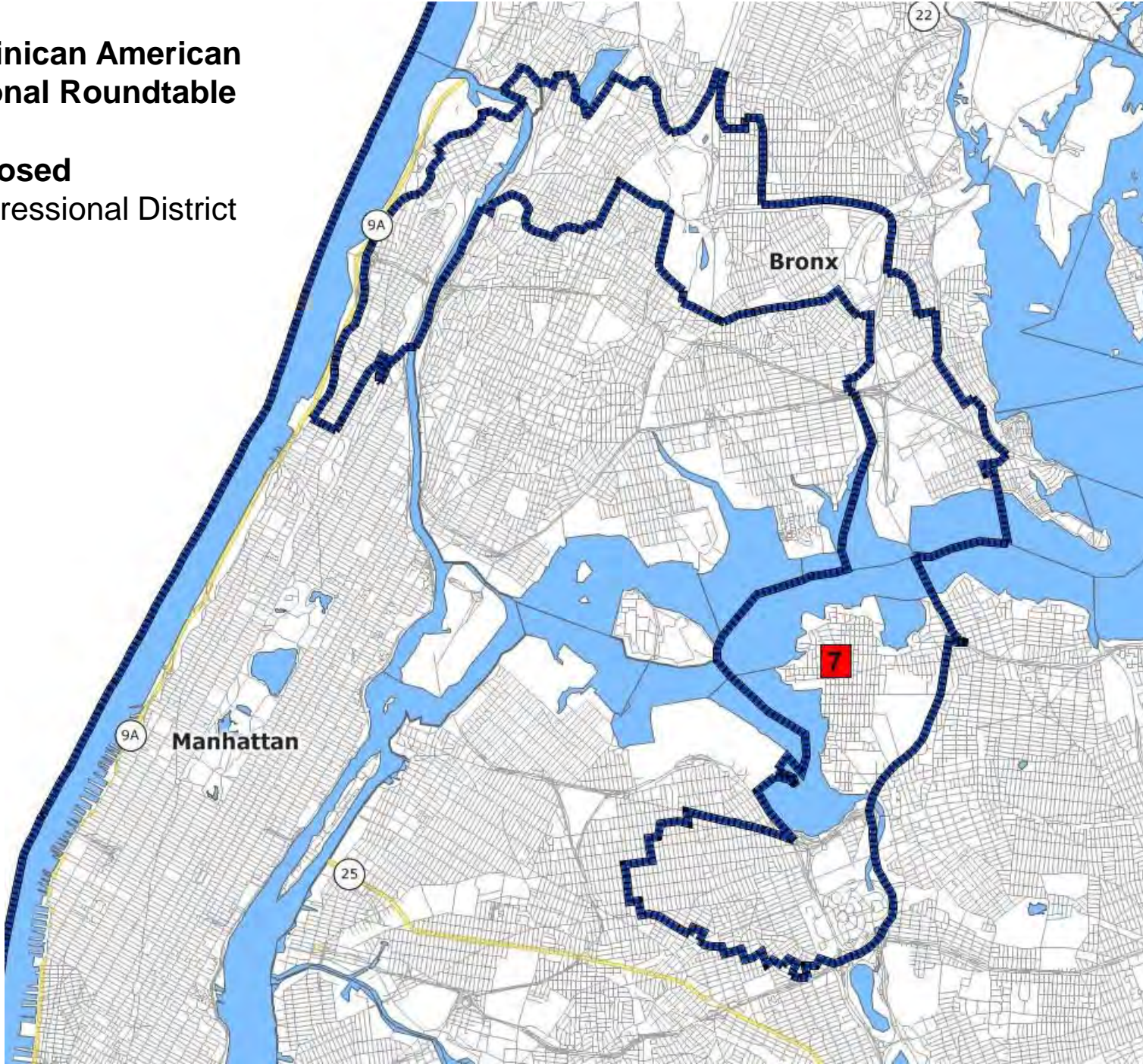
We have registered to speak at the hearing on March 5, 2012, and look forward to addressing these matters with the Court at that time.

We thank the Court for its consideration of this proposal.

Respectfully,
/s/ Becker & Poliakoff, LLP
Becker & Polikoff, LLP
Attorneys for Dominican American National
Roundtable

**Dominican American
National Roundtable**

**Proposed
Congressional District**



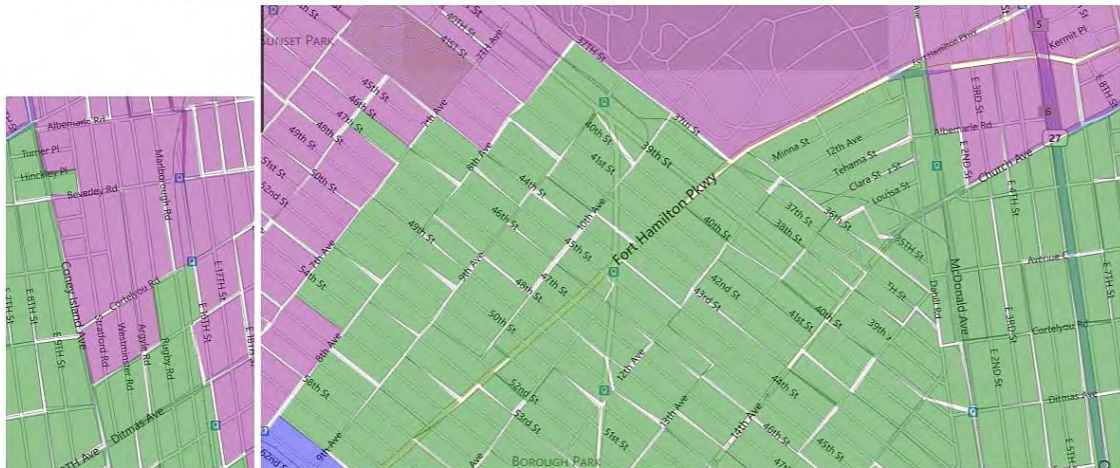
District 2 New Jewish Majority District



District 2 Census

CD 2		
Total Population		
All	Pop	%
Tot	713,923	
Wh	446,363	(62.5)
Bl	38,005	(5.3)
Hisp	84,472	(11.8)
Asn	133,474	(18.7)
Nat	740	(0.1)
Oth	10,867	(1.5)
Voting Age Pop		
18+	Pop	%
Tot	534,942	
Wh	336,477	(62.9)
Bl	23,456	(4.3)
Hisp	60,237	(11.3)
Asn	101,856	(19.0)
Nat	455	(0.1)
Oth	7,441	(1.4)

district 2 closeups



Supporting Materials for NY Fair Districts submission

By: Jesse Laymon

Overview:

Thank you for requesting public submissions in this rushed process to produce Congressional Maps for New York State. I am a resident of New York (city and state) and a regular voter, making this submission on behalf of no one other than myself and the other voters who I think are denied a chance to best representation by districts that are skewed towards uncompetitive elections and incumbent protection.

I am submitting .csv files of the districts' racial and partisan breakdowns, as well as those of the voting blocks I used to create this maps (via the online and free Dave's Redistricting App). In the body of this document I will also include visual depictions of the districts.

If you want more information on my maps or on any particular district, I would be happy to provide them or assist you in any way in using some or all of the district ideas I've included here. I hope some of these prove helpful to you in creating the new map of New York. My contact information is:

Jesse Laymon

jesse.laymon@gmail.com

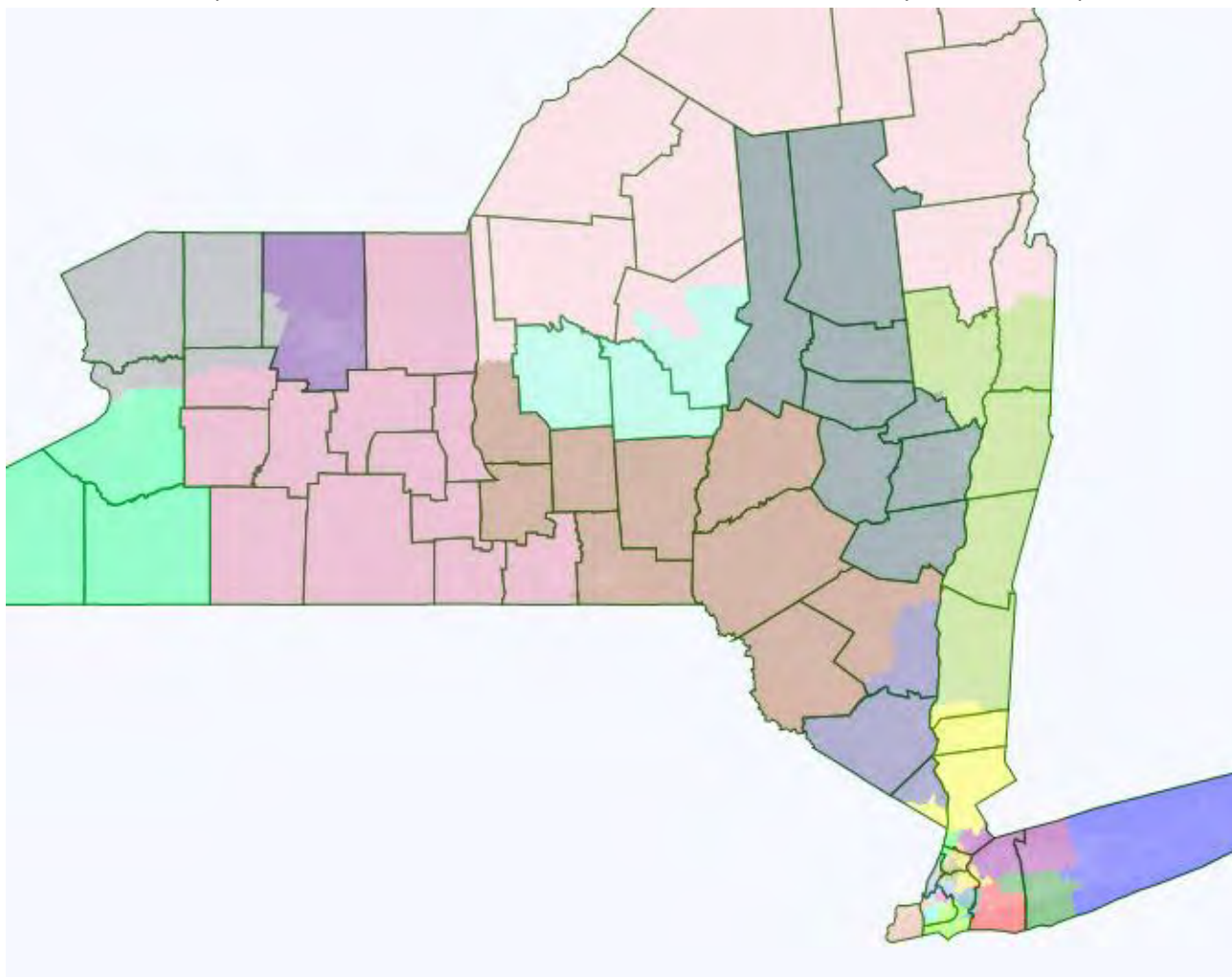
646-530-0378

The Districts

Statewide principles – I strove to create a maximum number of districts statewide that reflected the political leanings of their broader communities, and especially that allowed for competitive elections. Thus, whenever possible, I set a target around the neutral Partisan Voting Index of D+0 or R+0 – districts that mimic the partisan split of the nation as a whole. I also tried to unite communities of interest, by keeping neighborhoods, counties, and especially towns and cities intact in every possible case. Wherever possible, I made district borders out of existing recognized dividing lines – county lines, rivers, major roads, etc. Only when I worked on the majority-minority districts in NYC did I pick and choose specific voting districts, based on their racial composition; in other cases I tried to take a larger view and create broadly compact and contiguous districts.

In the process, I was able to protect all of New York's current majority-minority districts, and in fact to expand upon this. In NYC, I was able to convert the current 3 African-American majority districts and 1 African-American plurality district into 4 Af-Am majority districts; I was able to create a 2nd Hispanic majority district based in The Bronx, and preserve the two majority-minority districts in Queens.

Below is a broad map of the state as I've drawn the lines; after that is a district-by-district description.

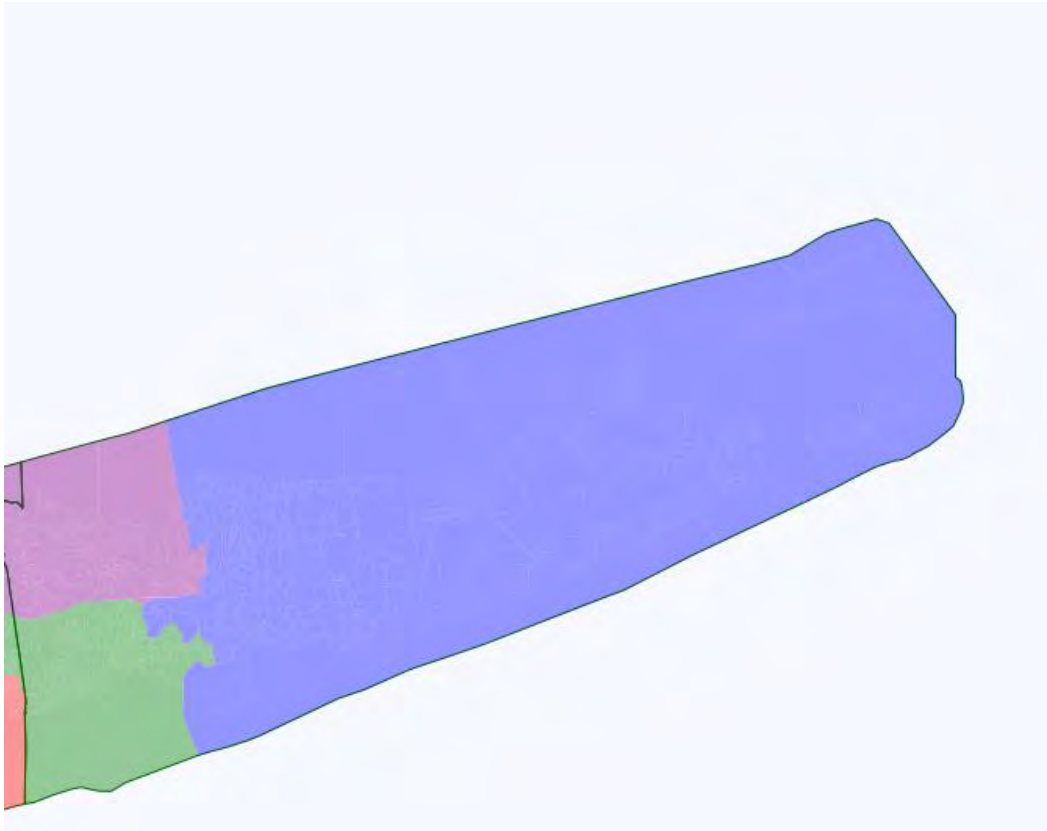


Long Island:

District 1: (Blue)

A Caucasian-majority district, broadly similar to the current CD1, based entirely on Suffolk county and following town lines for its western border. This is a neutral, competitive district (roughly R+0)

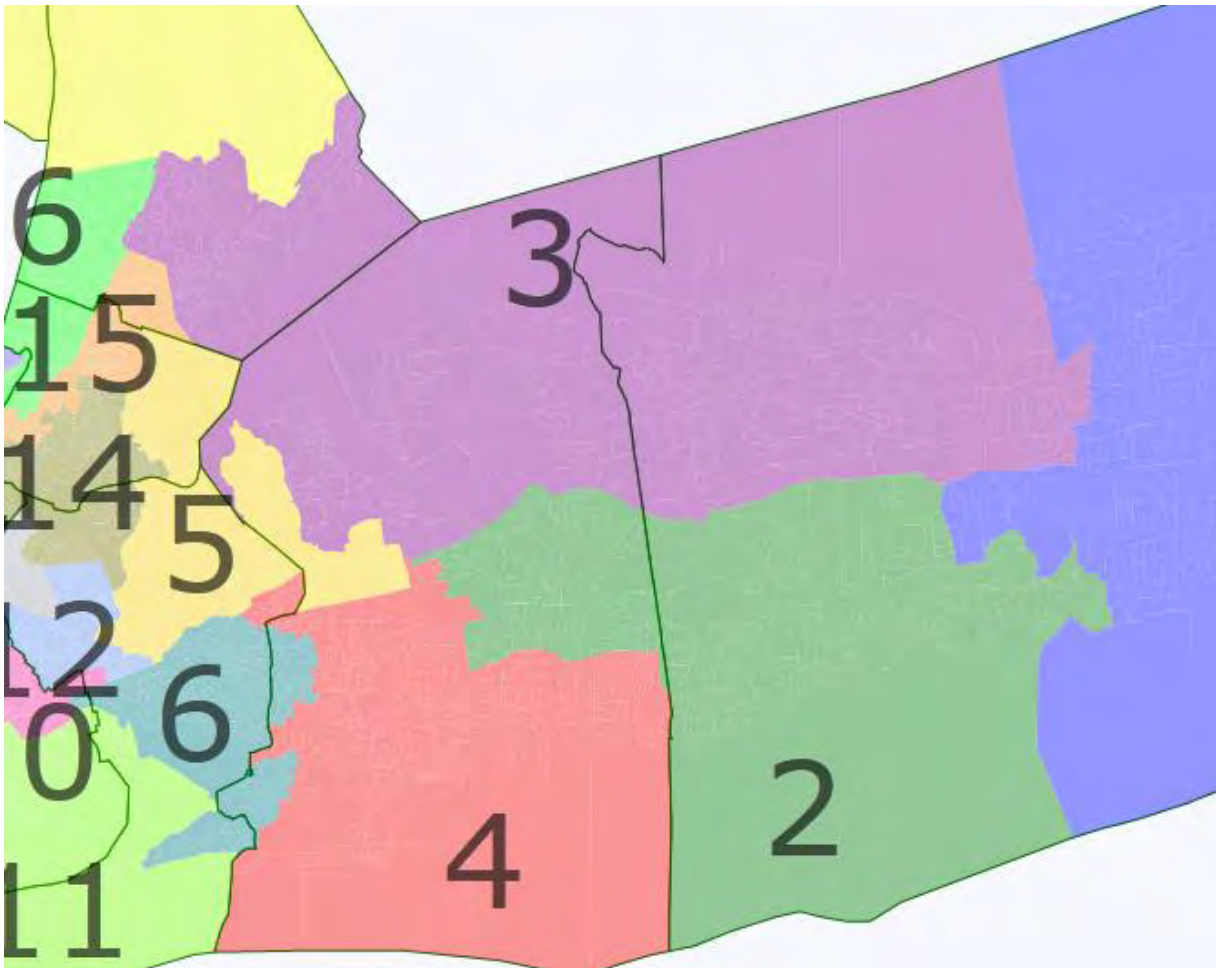
District	Total Population	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
1	717400	550346	423312	29007	319585	169633	146712



District 2 (Green):

A Caucasian-majority district, broadly similar to the current CD2, based in Suffolk and Nassau, defined as a “south shore” district, and using the Long Island Expressway or thereabouts as its northern border. This is another neutral competitive district (roughly D+0)

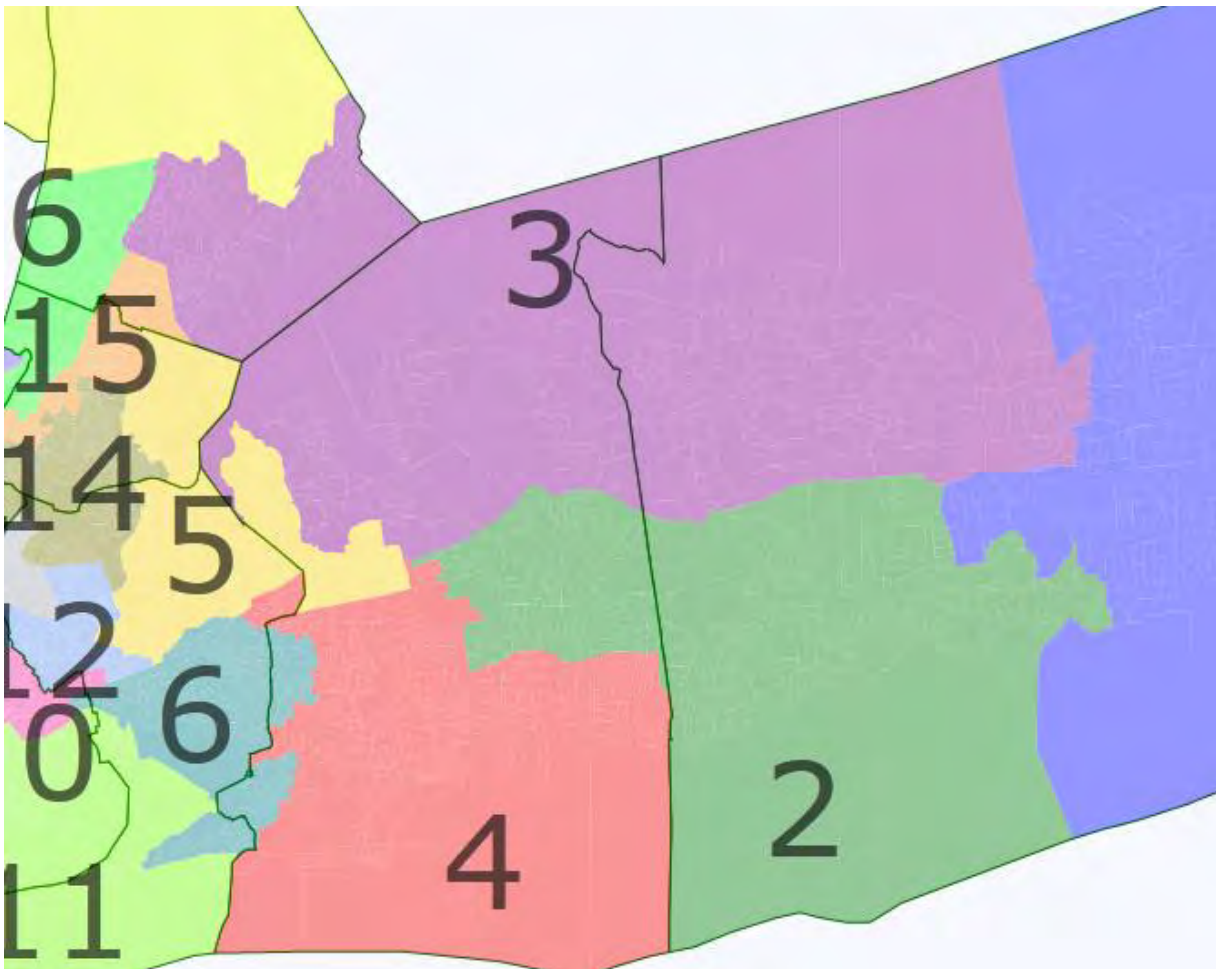
District	Total Population	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
2	717532	451228	360270	48324	301247	163046	135633



District 3: (Purple)

A Caucasian-majority district, sharing the core of the existing CD3, but defined more clearly as a “north shore” district. Based in Nassau, Suffolk and Westchester counties, and using the Long Island Expressway as its southern border, and various town lines for its northern (Westchester) border. This district links communities of similar demographics in NYC’s suburbs, and creates another neutral competitive district (roughly R+0).

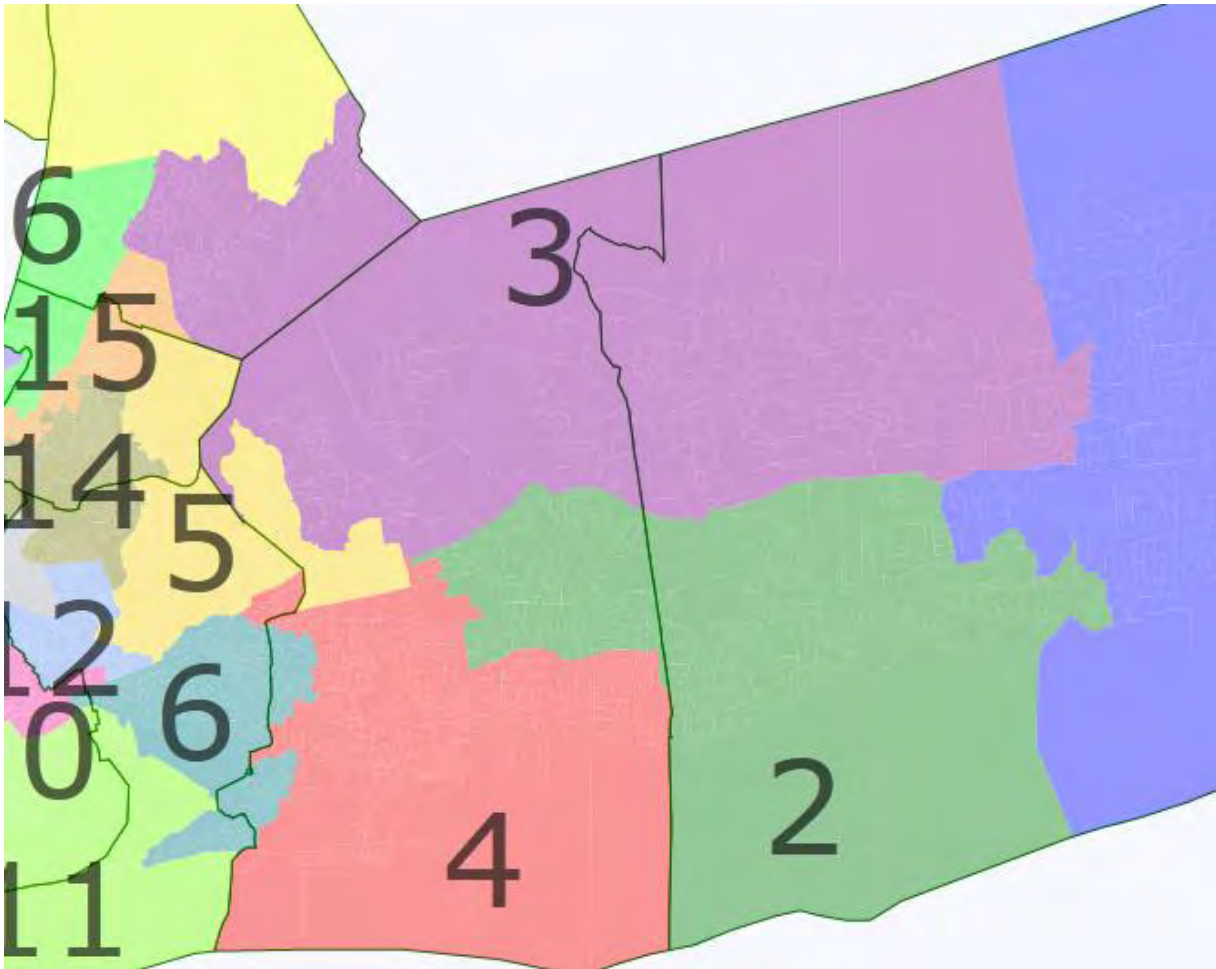
District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
3	717300	534010	540654	409937	343408	181331	159240



District 4: (Red)

A Caucasian-majority district, based in Nassau county, absorbing the remainder of the "south shore". Largely overlaps current CD 4. This district is as competitive as possible, given the remaining votes after the creation of CDs 1-3 (it is roughly D+1).

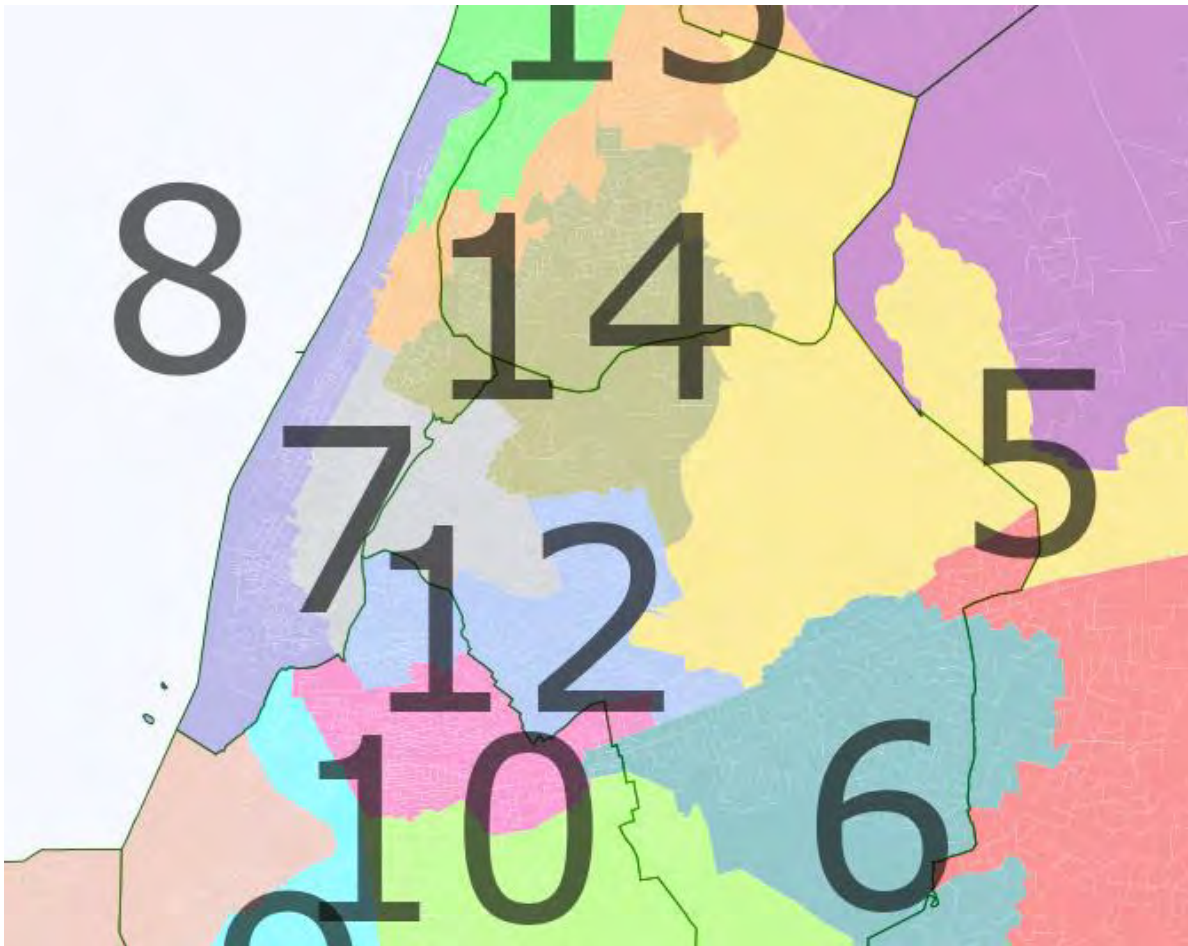
District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
4	717740	444625	551686	353554	71540	84811	339692	185450	151786



District 5: (Yellow)

A Caucasian-plurality district, with a substantial “asian influence”, as befits this part of the state (where asian-americans make up a substantial minority, but not a majority). Composed of parts of the former CD5 and CD7, and more compact than the previous (especially the old CD7). As with most NYC districts, this leans substantially to the Democratic party (roughly D+10).

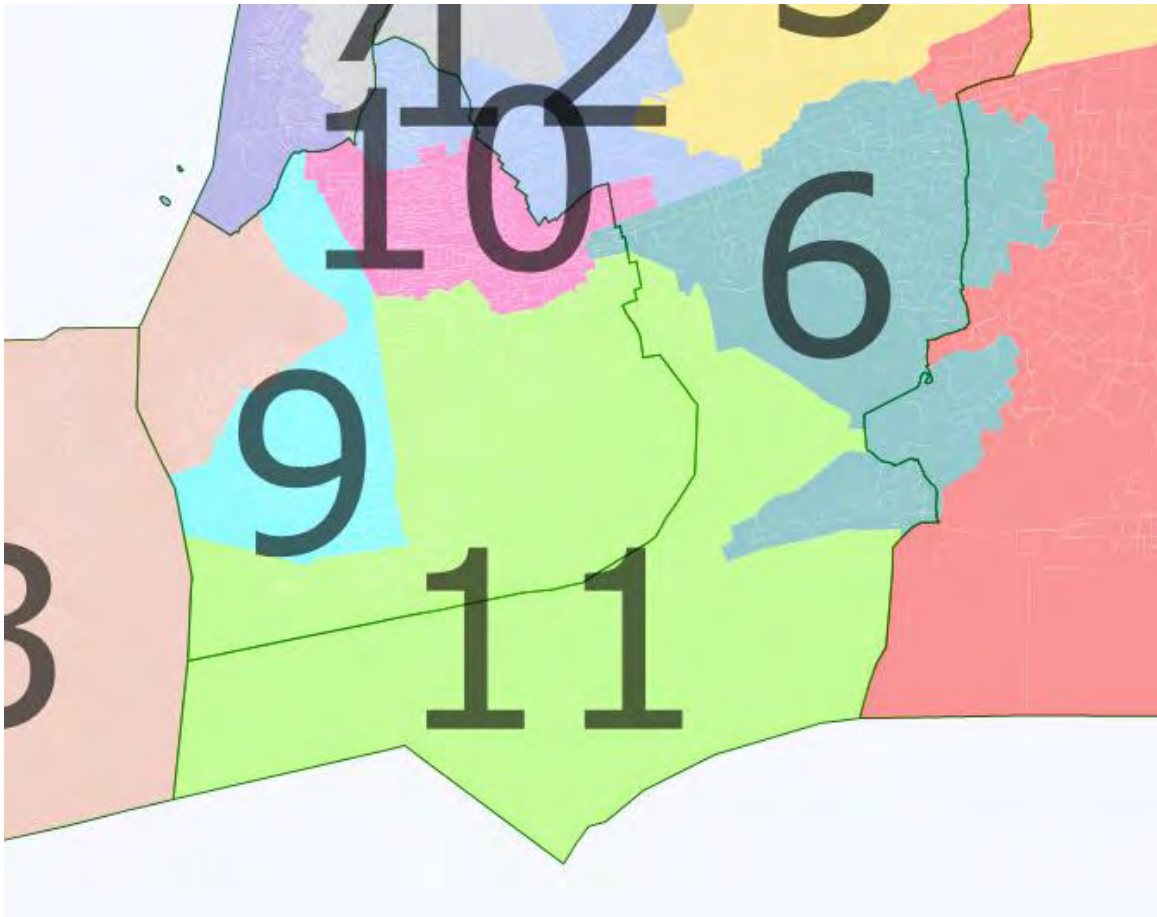
District	Total Population	White (NH)	Hispanic	Asian and Pacific Islander (NH)	Total Population 18+	White 18+ (NH)	Hispanic 18+	Asian and Pacific Islander 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
5	717844	316992	111111	242416	582207	266528	84597	194788	238031	144459	91667



District 6: (Teal)

An African-American Majority District, very similar to the current CD6, based in southern Queens (with small incursions into Nassau and Kings, to include African-American communities in both and achieve 50.1% Af-Am total), and heavily Democratic .

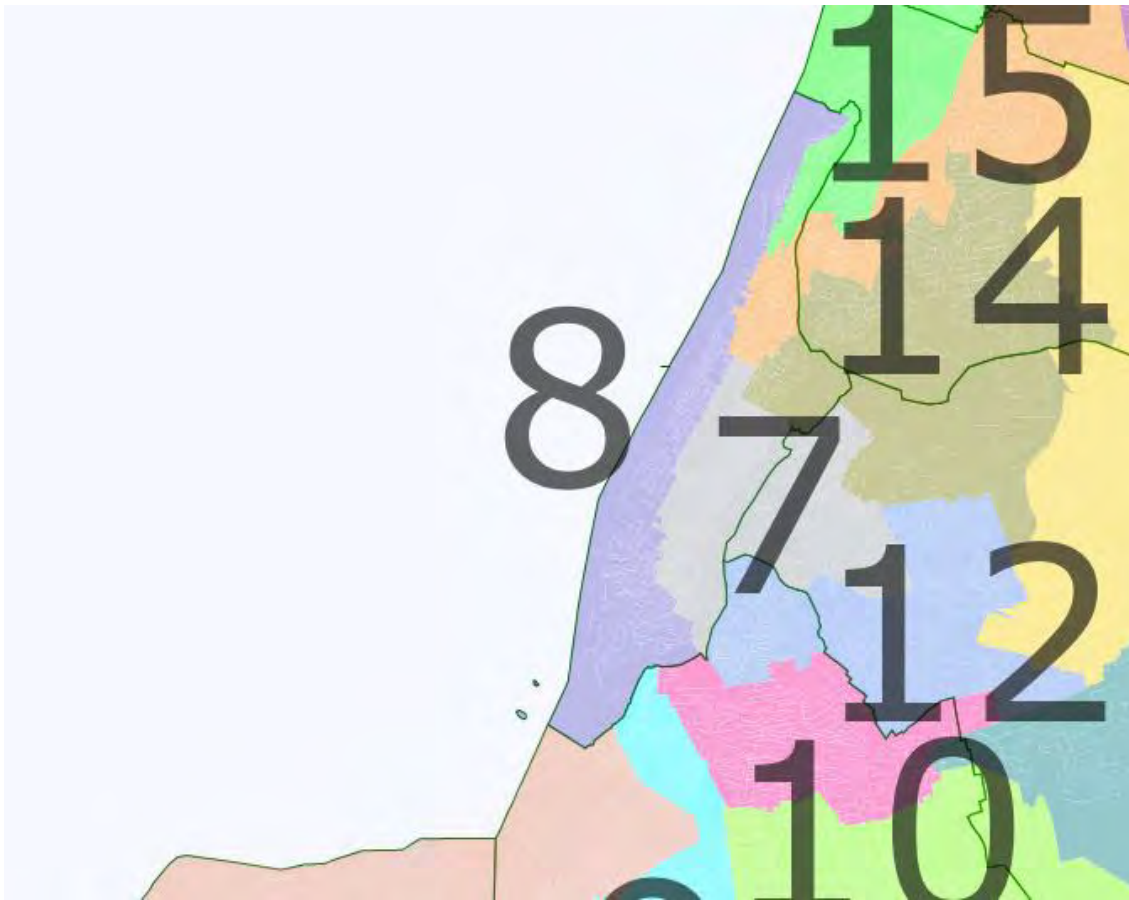
District	Total Population	White (NH)	Black (NH)	Hispanic	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
6	717847	83161	357274	139240	540890	66497	270812	100020	237173	205023	31472



District 7: (Gray)

A Caucasian-majority district in Manhattan and Queens, on the East Side of Manhattan (with Broadway as its western border) and Western Queens (with the BQE as its eastern border). Broadly similar to the current CD14, but more compact.

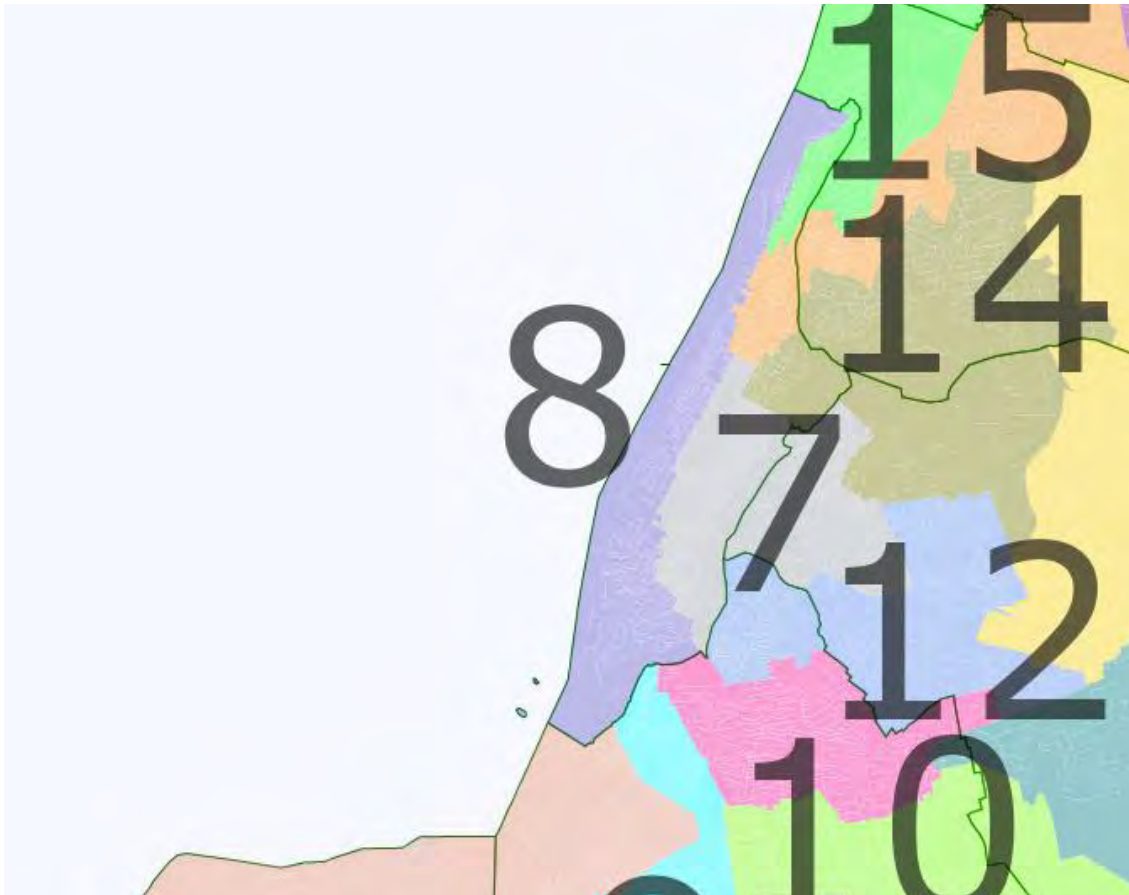
District	Total Population	White (NH)	Hispanic	Asian and Pacific Islander (NH)	Total Population 18+	White 18+ (NH)	Hispanic 18+	Asian and Pacific Islander 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
7	718306	424863	128739	114428	621252	381614	102219	97756	282576	220360	59601



District 8: (Purplish Blue)

A Caucasian-majority district on the West Side of Manhattan, entirely contained within New York County. Similar to the current CD8, but much more compact.

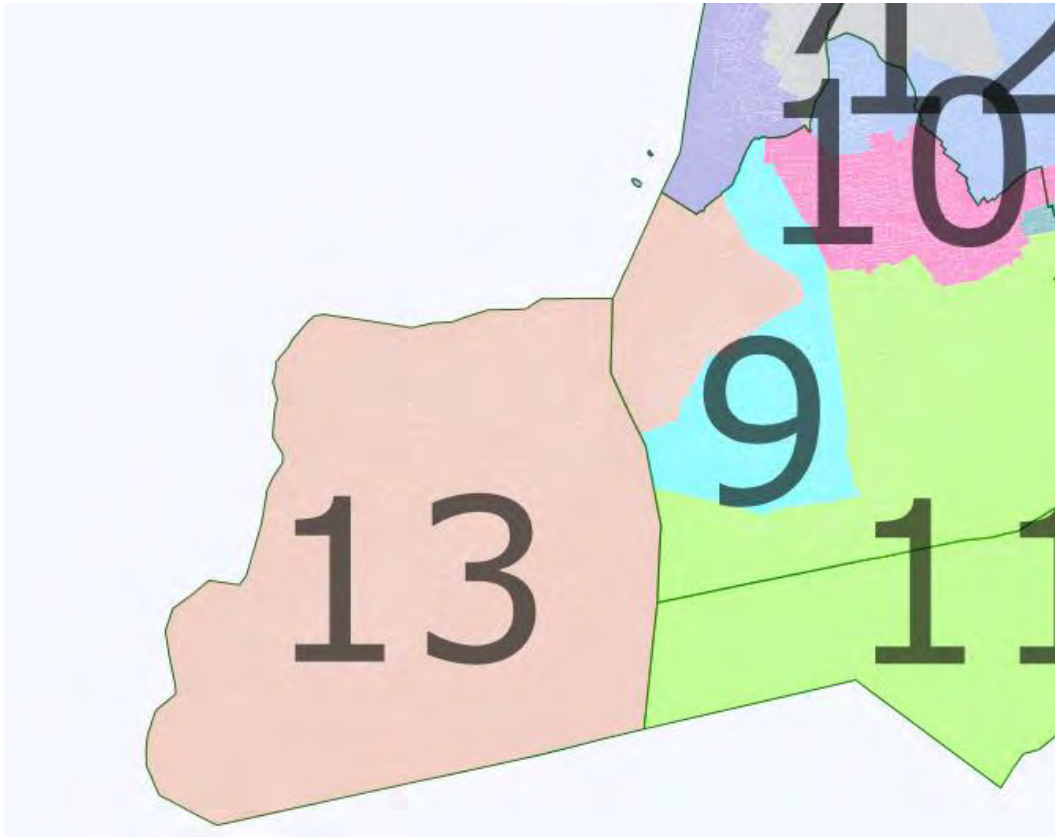
District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
8	718112	401595	626984	360569	316232	272589	40528



District 9: (Light Blue)

A Caucasian-Majority district, entirely contained within Kings County. This district absorbs nearly all of the voting district not needed in the two African-American districts protected by the VRA, and does so far more clearly and compactly than the districts it replaces (CD 8 and CD 9).

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
9	718177	430566	547112	329714	201305	127471	72164

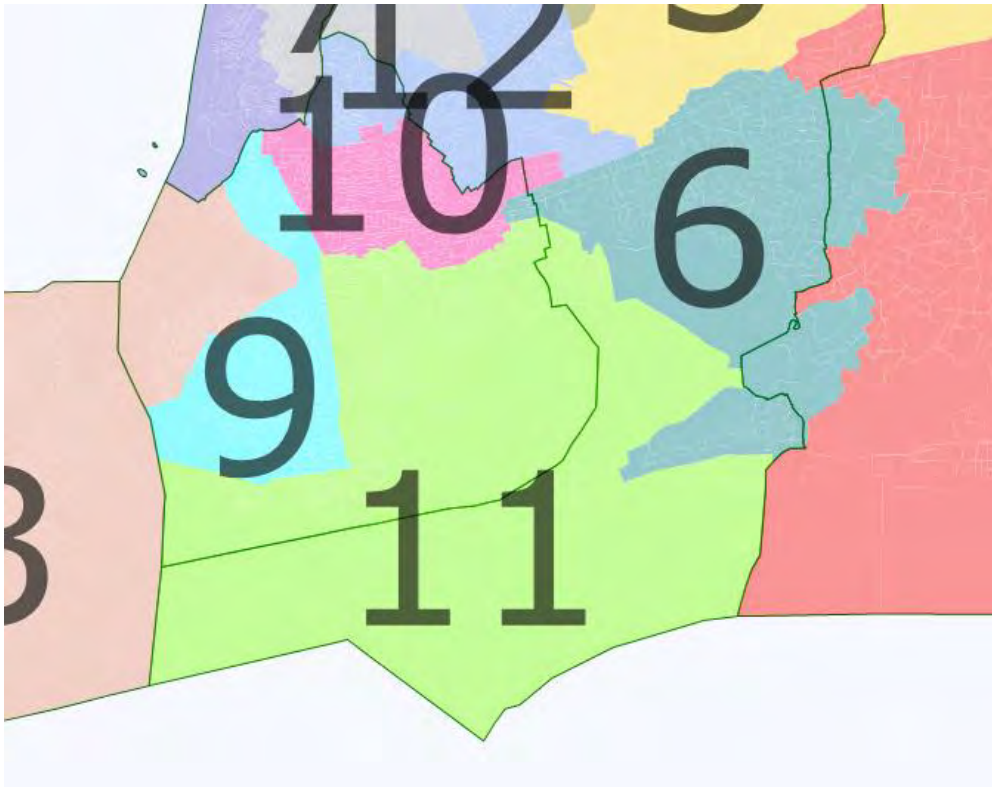


District 10: (Pink)

District 11: (Green)

The Brooklyn VRA-protected African American districts. Differently shaped than the current CDs 10-11, to allow for clearer borders.

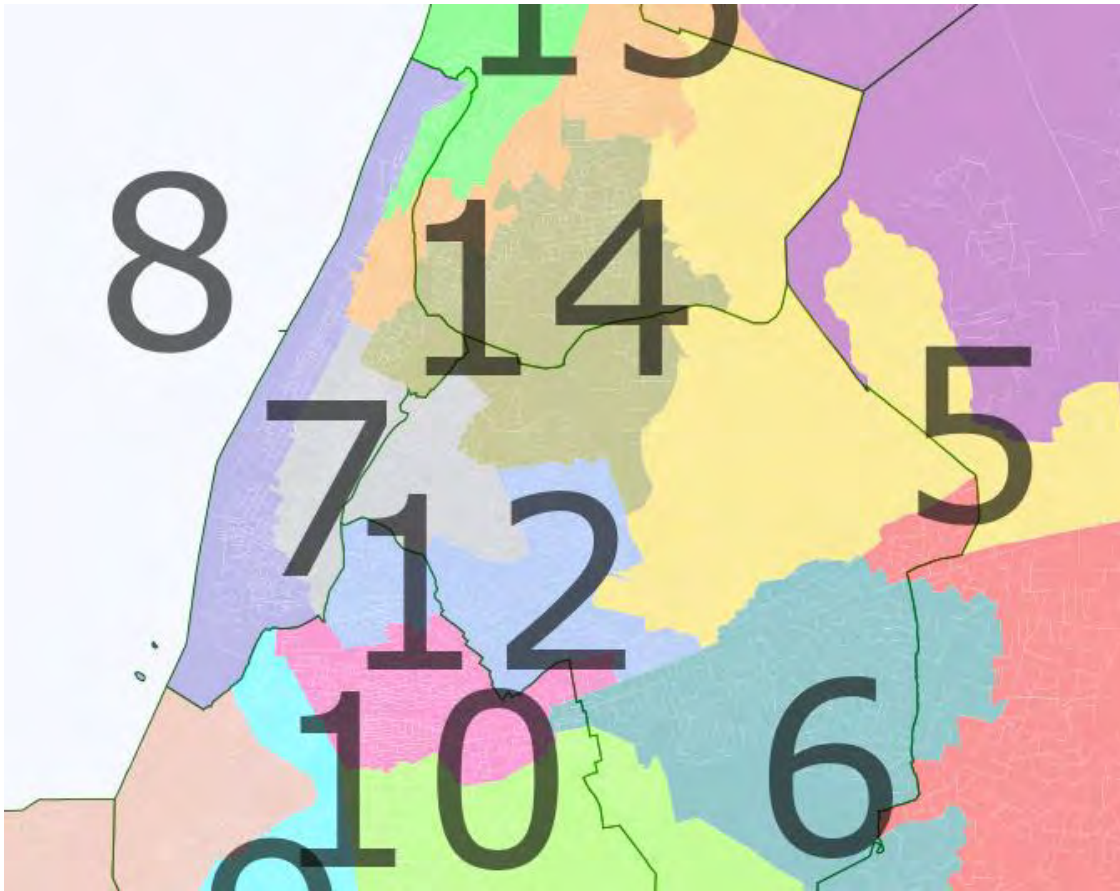
District	Total Population	White (NH)	Black (NH)	Hispanic	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
10	717392	86455	366708	220092	537786	70542	276116	156716	228155	217050	10283
11	717767	226210	367877	76991	556907	186531	279628	55065	241278	184660	55646



District 12: (Medium Blue)

A majority-minority, Hispanic-influence district in Northern Brooklyn and Central Queens. Similar to the current CD12.

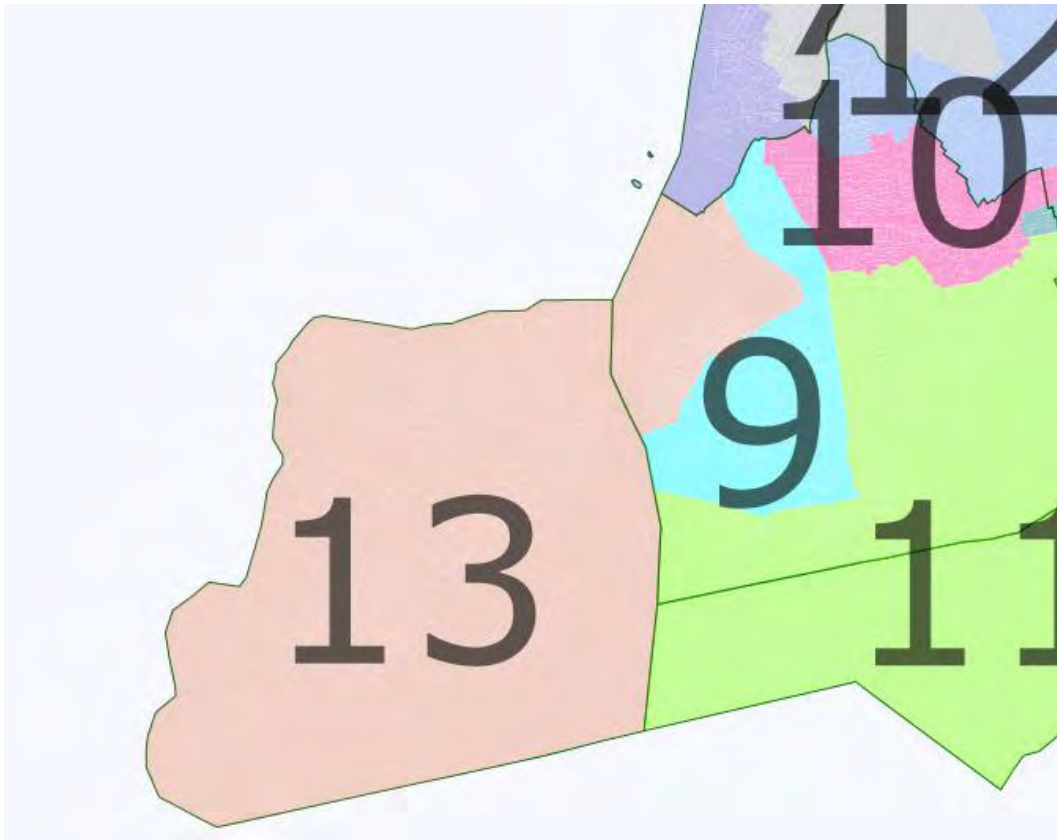
District	Total Population	White (NH)	Black (NH)	Hispanic	Asian and Pacific Islander (NH)	Native American (NH)	Other (NH)	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Asian and Pacific Islander 18+ (NH)	Native American 18+ (NH)	Other 18+ (NH)
12	717510	267186	26814	285740	121730	1147	14893	562289	214531	21823	214989	99533	698	10715



District 13: (Tan)

The Caucasian-Majority Staten Island district. I was able to create yet another competitive district here (roughly D+2). This district also has some of the clearest borders of any: using just two major roads in Brooklyn to define virtually its entire border.

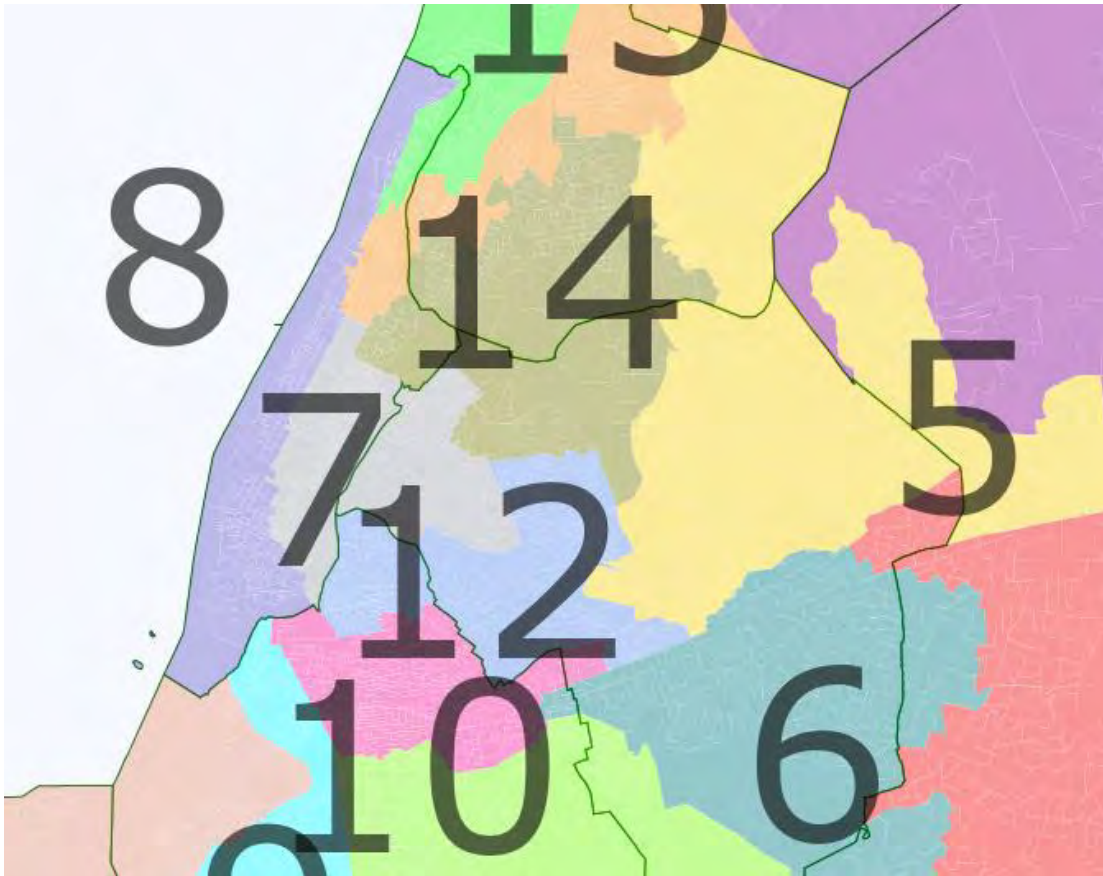
District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
13	717250	391358	553351	317159	230658	125348	103438



District 14: (Gold)

A new S. Bronx, East Harlem, Queens district, one of two Hispanic-Majority district based largely in The Bronx (and more similar to the existing CD 16).

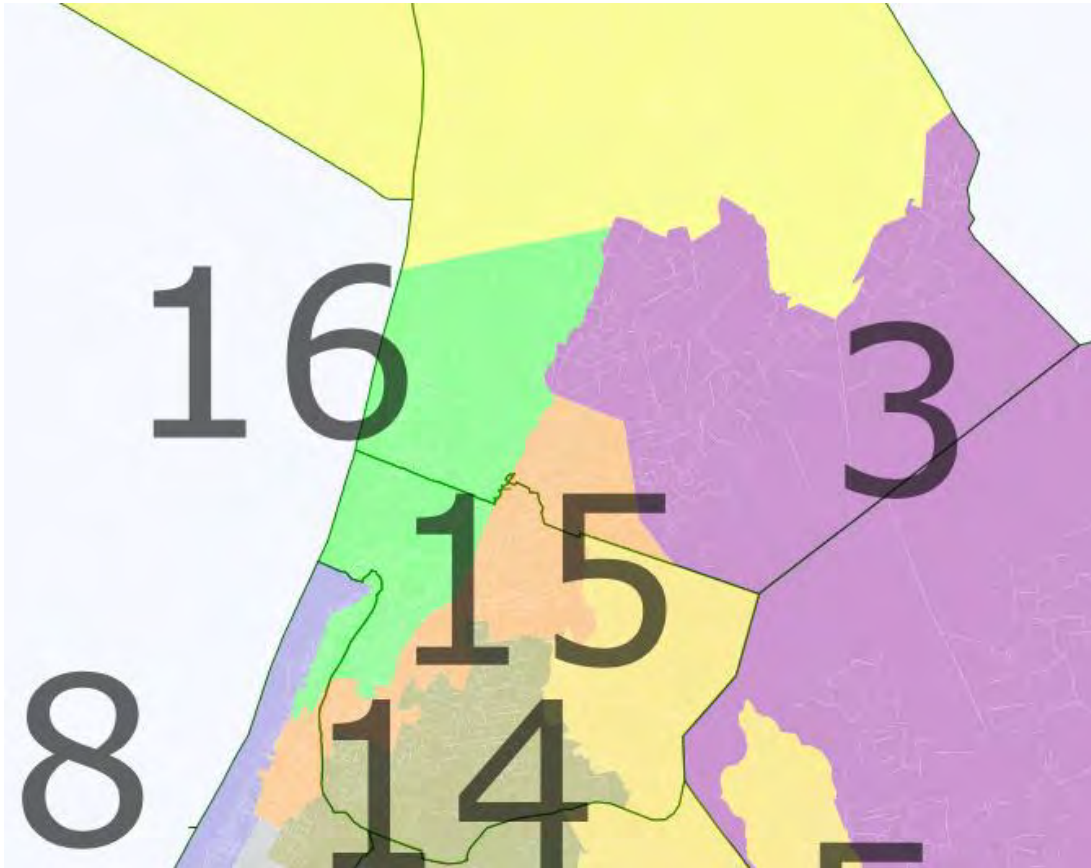
District	Total Population	White (NH)	Black (NH)	Hispanic	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
14	717359	85930	162218	405227	535642	73673	122036	291136	196325	173081	22411



District 15:

One of my proudest accomplishments, re-creating a majority-African-American seat based in Harlem and the Bronx (reaching all the way to Mount Vernon to do so).

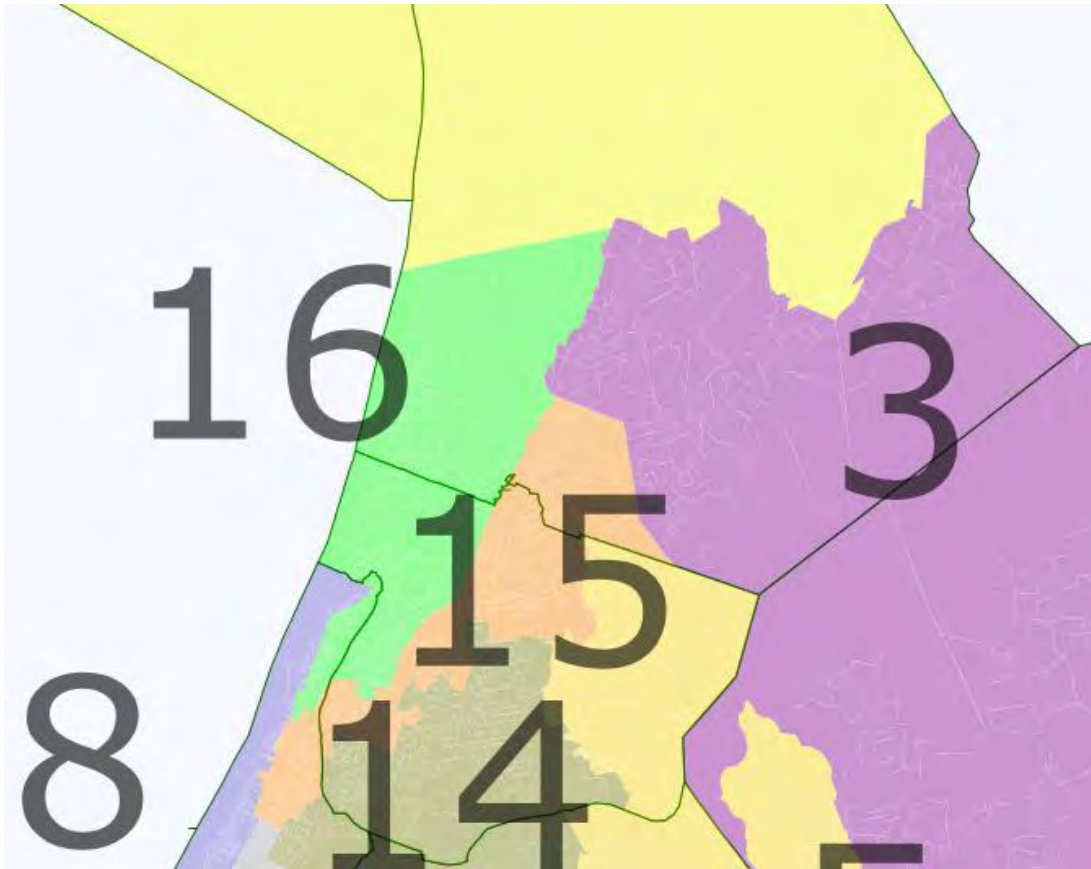
District	Total Population	Black (NH)	Hispanic	Total Population 18+	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
15	717985	356124	264954	534416	269946	184292	234195	218438	14987



District 16:

Another accomplishment, creation of a second Hispanic-Majority seat in The Bronx. Based in the NW Bronx and including all of Yonkers, this has the clear boundry of Yonkers' border, and uses Broadway in Manhattan.

District	Total Population	White (NH)	Black (NH)	Hispanic	Total Population 18+	White 18+ (NH)	Black 18+ (NH)	Hispanic 18+	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
16	717588	148812	117700	408270	542489	127642	88953	293327	214548	172204	41109

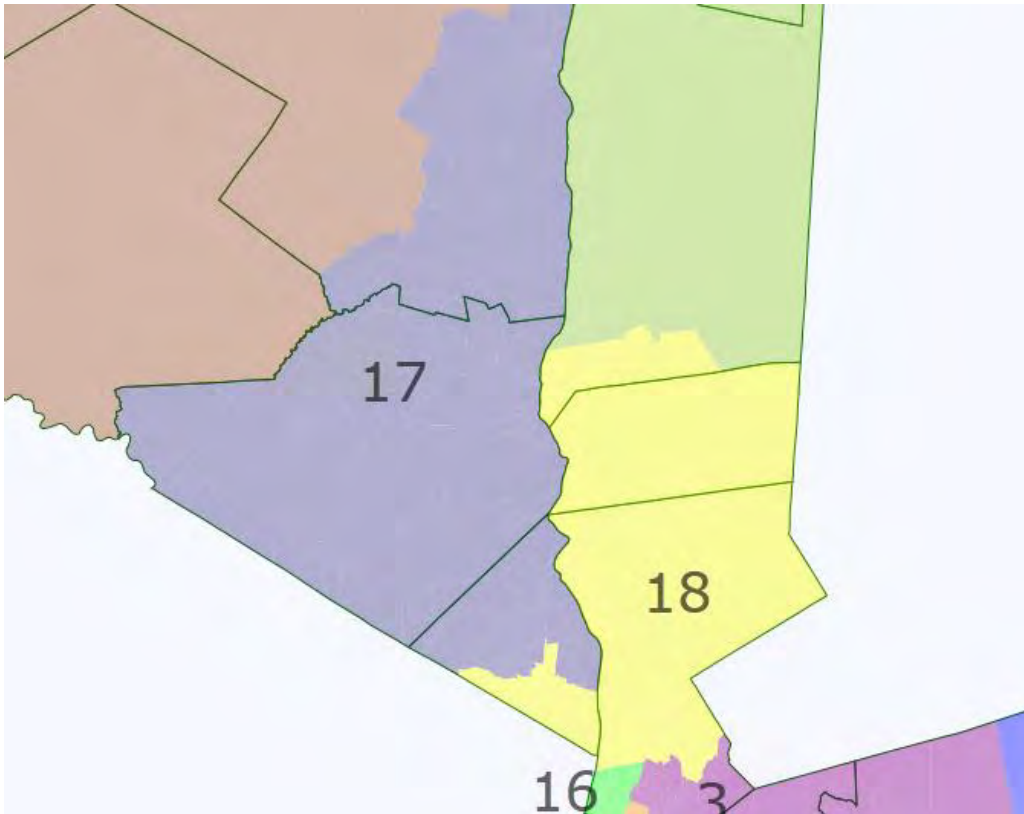


District 17 (Purple)

District 18: (Yellow)

My two Lower-Hudson Valley districts, with the 17th entirely on the western side of the river, and the 18th almost entirely on the eastern side. Both are Majority-Caucasian, and District 17 achieves clear competitiveness (D+1).

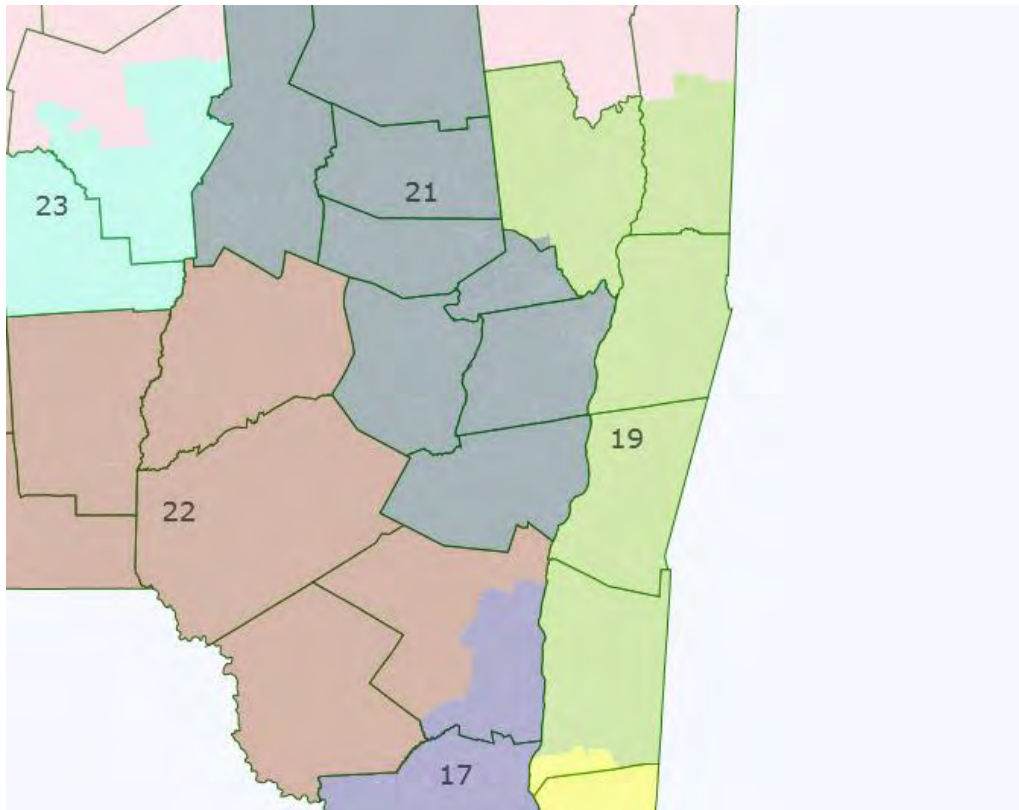
District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
17	717613	490228	524353	368169	297340	160736	133403
18	717520	508887	547216	395913	342178	195702	143366



District 19:

The Upper Hudson Valley District, Highly Competitive (R+0) and clearly defined as the east side of the river up beyond Albany County.

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
19	718238	610811	560185	487134	340528	180417	154655

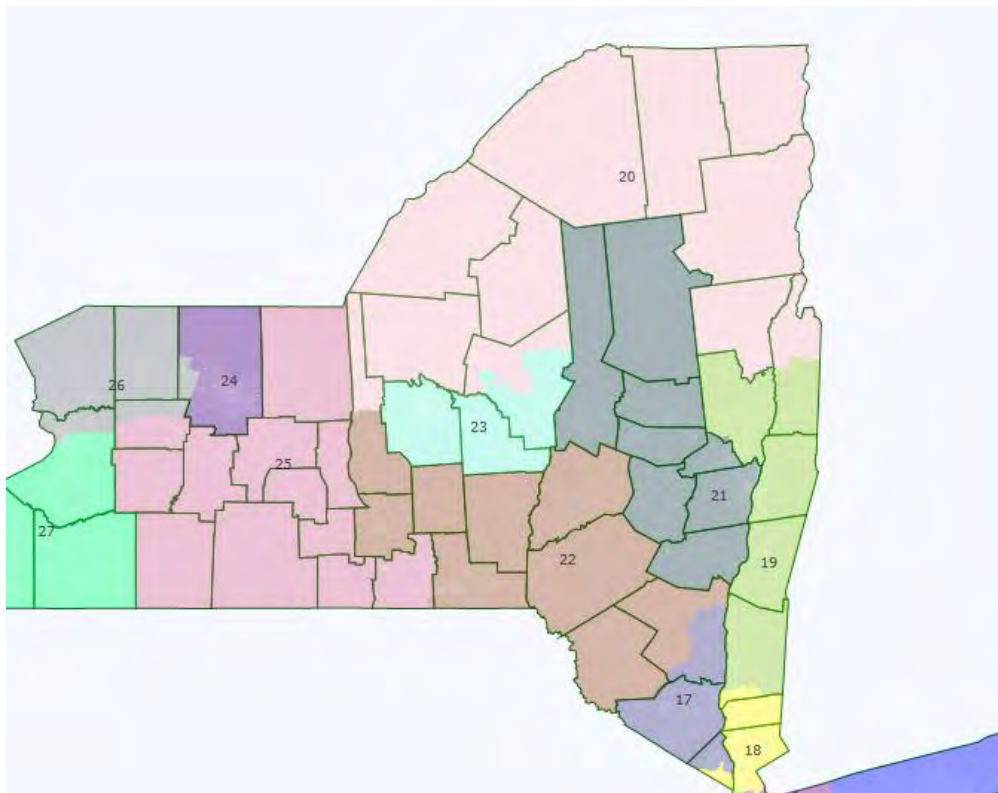


District 20: (light Pink)

District 21: (greenish Gray)

These two districts encompass the Capital District and North Country, and closely parallel the current CDs 21 and 23 (although 21 had to grow substantially north). The new district 20 (former 23) remains highly competitive (R+1).

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
20	717642	654691	559572	513763	281011	146340	129966
21	718127	587425	566293	477557	327848	181073	140472

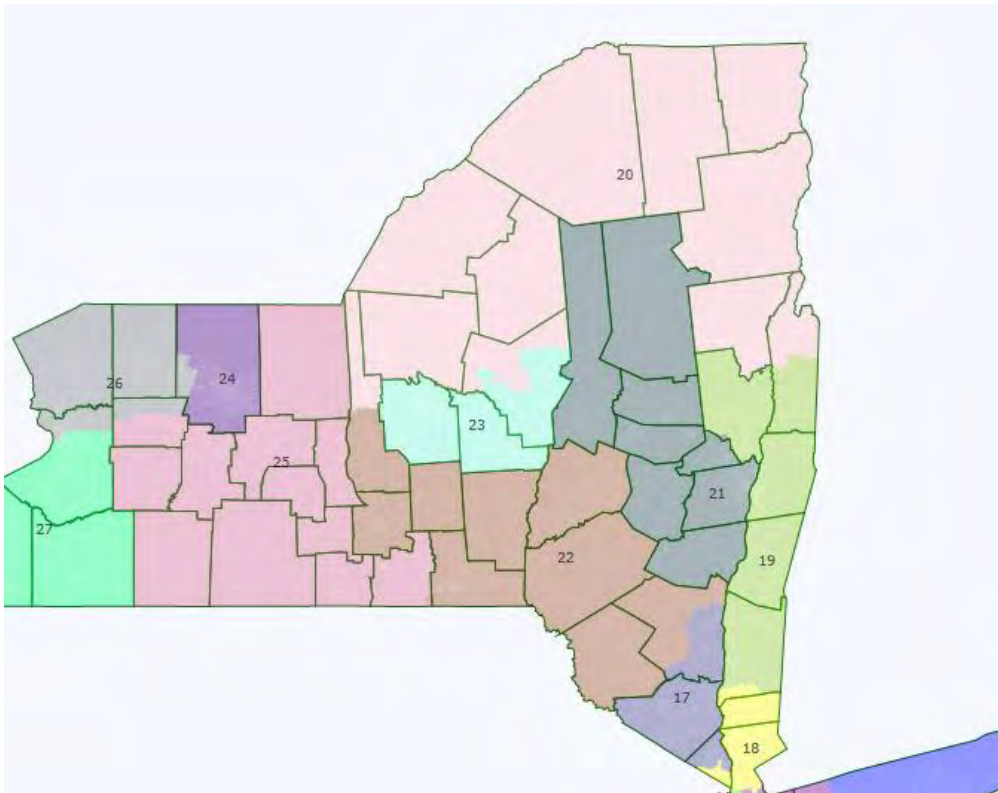


District 22: (Brown)

District 23: (Teal)

The 22nd District encompasses the Southern Tier of New York, including the cities of Binghamton, Ithaca, and Cortland. The 23rd is a simple, compact district based on Syracuse and Utica. Each represents clear communities of interest.

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
22	717838	621623	573616	504152	311187	173183	132457
23	717768	586581	555651	469866	320462	178147	136483

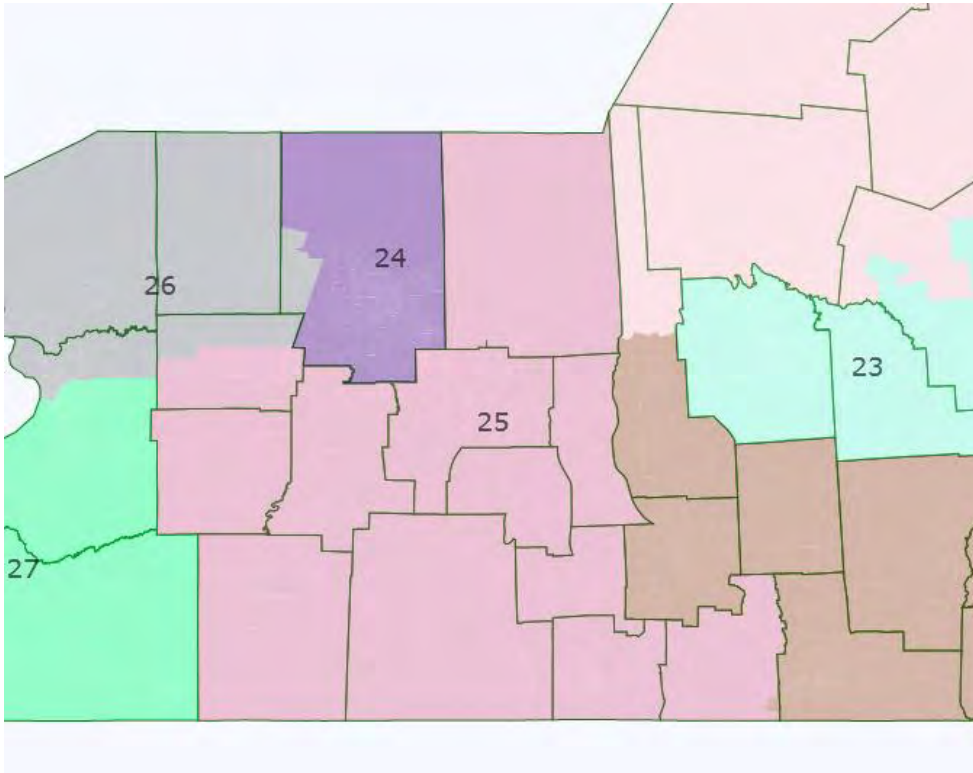


District 24: (Purple)

District 25: (Dark Pink)

These districts, as well as the 26th and 27th, vastly improve on the complicated current map of Western New York. If you only take one part of my map as your inspiration, take these last four districts! The 24th and 25th deal with the Rochester area and south. The 24th is entirely contained in Monroe County. The 25th contains none of Monroe County, but most of its surroundings. This is the clearest way to divide the area. Neither is competitive (the 24th safely Democratic, the 25th safely Republican), but neither is this area.

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
24	717270	517307	554036	420844	345330	202332	138418
25	717616	661767	557051	518636	313921	140408	168767

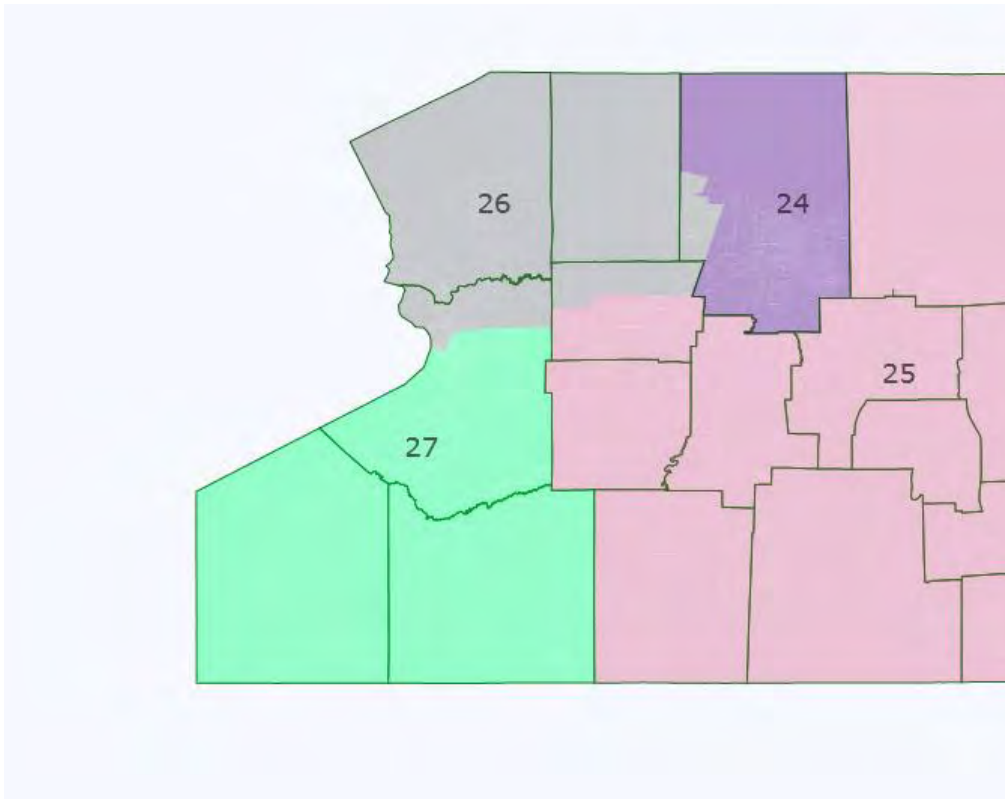


District 26: (Gray)

District 27: (Green)

Finally, these two districts do away with the former monstrosity that stretched from Buffalo into Rochester. With a clear division using the highway in central Buffalo, these are the North Buffalo and suburbs (26th) and South Buffalo and suburbs (27th) districts. Both are politically competitive, roughly D+1 or D+2.

District	Total Population	White (NH)	Total Population 18+	White 18+ (NH)	Pres08 Total Vote	Pres08 Dem Vote	Pres08 Rep Vote
26	717599	571477	564638	464252	329620	182565	141834
27	717734	601528	558556	480744	333230	178349	149395



Thank you.

Pub-leblanc-monroe.pdf

Re-districting comment

Gerrymandering is a rather nasty word. It suggests a desire to take away from the voters the ability to influence public policy by their vote and replace it with an automatic party line vote. Please make sure that there will be a vigorous debate in the upcoming elections rather than a foregone conclusion.

My county, Monroe County, deserves a better choice than we are likely to have. We need districting that will be good for all the candidates all the time, not just one now.

Thank you for your consideration.

Anne LeBlanc
2759 Ridgeway Ave.
Rochester, NY 14626
(585) 254-3947

Pub-leblanc2-monroe.pdf

Second re-districting comment

I apologize for the need for this second comment. I had found out about the possibility of sending a comment only this afternoon and I would like to be a little more precise.

My county, Monroe, has for years had a dedicated congresswoman, Louise Slaughter. She has not, in my recollection, ever faced a tight race so that the comparison of her principles and policies are compared to those of a significant contender. I do not know that this redistricting will necessarily provide such a race. I hope I am wrong.

Next door, in the 25th Congressional district, the last election showed a hard-fought, very tight battle. The candidates both had to specify where they stood on a number of issues and people were aware that their votes counted. I am told that this district has been re-shaped so that the next election will be won by a Democrat. Republicans in Webster who worked on the last election are angry.

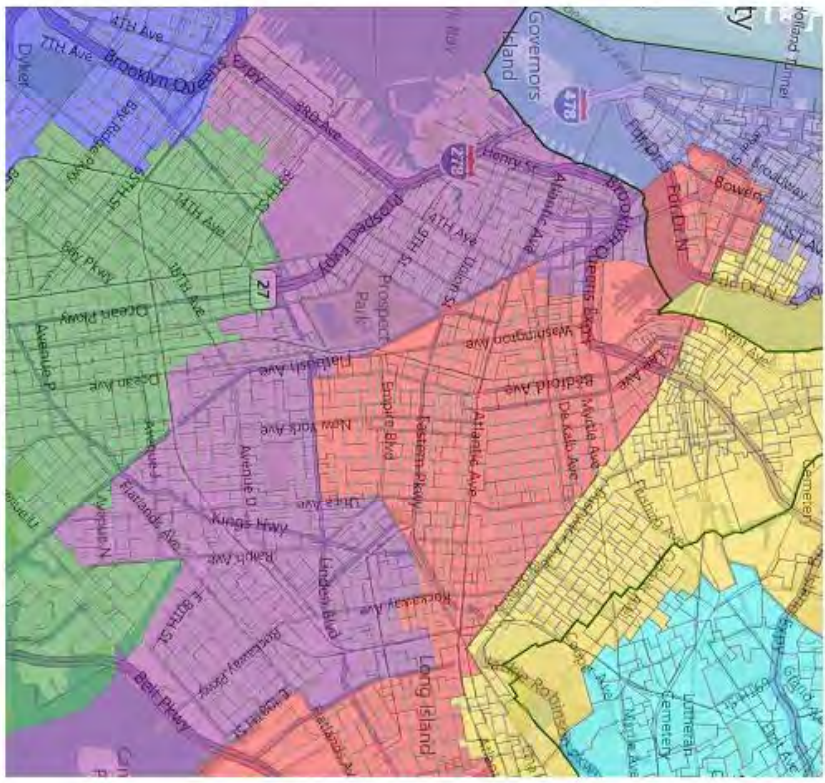
I understand that there are some areas that will strongly tend to be in one party or the other. However, when a district that was balanced before is now re-defined such that one party is complacent, like in the 25th district, we've all lost.

Thank you – again – for your consideration.

Anne LeBlanc
2759 Ridgeway Ave.
Rochester, NY 14626
(585) 254-3947

I just sent a second re-districting comment

district 3
old district 11



district 3 census

CD 3		
Total Population		
All	Pop	%
Tot	711,826	
Wh	150,305 (21.1)	
Bl	357,976 (50.3)	
Hisp	136,444 (19.2)	
Asn	49,354 (6.9)	
Nat	1,554 (0.2)	
Oth	16,193 (2.3)	
Voting Age Pop		
18+	Pop	%
Tot	553,071	
Wh	129,303 (23.4)	
Bl	272,113 (49.2)	
Hisp	99,964 (18.1)	
Asn	39,531 (7.1)	
Nat	1,126 (0.2)	
Oth	11,034 (2.0)	



Center for Law and Social Justice

Medgar Evers College of the City University of New York
1150 Carroll Street, Brooklyn, New York 11225

Esmeralda Simmons, Esq.
Executive Director
(718) 804-8893
(718) 804-8833

March 2, 2012

VIA ECF

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Favors v. Cuomo**
11 Civ. 5632

Dear Judge Mann:

Plaintiffs-Intervenors Donna Drayton et al., in accordance with the Court's instruction at the hearing held on February 27, 2012, respectfully submit this letter brief, along with the attached Declaration of Dr. Andrew Beveridge, objecting to certain of the plans submitted by the parties herein. This letter focuses on whether these plans violate Section 2 of the Voting Rights Act. Dr. Beveridge's Declaration provides an analysis of these plans in light of the Voting Rights Act and in light of the other criteria set forth in Rodriguez v. Pataki, 207 F. Supp. 2d 123, 125 (S.D.N.Y. 2002).

Introduction

Using the Unity Plan as a bench mark, plaintiffs-intervenors examined the areas that cover the four New York City Congressional districts where Blacks have traditionally elected representatives, as well as the dense Black communities of the Northeast Bronx/ Lower Westchester and Long Island. In so doing, we focused on whether the other proposed redistricting plans submitted by the parties herein complied with the Voting Rights Act. Although the Supreme Court has held that redistricting plans prepared and adopted by a federal court are exempt from Section 5 review, see Connor v. Johnson, 402 U.S. 690, 691 (1971), the Court has also made clear that court-ordered plans must meet the requirements of Section 2 of the Voting Rights Act. See e.g., Winter v Brooks, 461 U.S. 921 (1983) (mem).

Section 2 of the Voting Rights Act prohibits any state or political subdivision from imposing any voting qualification, standard, practice or procedure that deprives voters of an effective opportunity to nominate and elect candidates of choice because of

their race, color or status as a member of a language minority group, 42 U.S.C. Section 1973(a). Generally, in the reapportionment context, Section 2 challenges involve claims by protected groups that their communities have been “packed” or “fractured.” In brief, “packing” occurs when a minority group is concentrated into one or more districts so that the group constitutes an overwhelming majority in those districts, thus minimizing the number of districts in which the minority could elect candidates of their choice. See e.g., Voinovich v. Quilter, 507 U.S. 146, 153-54 (1993). “Fracturing,” “cracking” or “splitting” occurs when a group of minority voters is broken off from a concentration of minority voters and added to a large majority district. Gingles v. Edmisten, 590 F. Supp. 345, 374-375 (E.D. N. C. 1984), *aff’d in part, rev’d in part sub nom. Thornburg v. Gingles*, 478 U.S. 30 (1986). As detailed below, the maps submitted by Common Cause, the Assembly Majority, the Assembly Minority, the Senate Majority and the Rose Intervenors each engage in these nefarious practices.

I. COMMON CAUSE MAPS

DISTRICT 6 (Queens and Western Long Island) – Common Cause’s District 6 wrongly excludes the heavily Black area of Elmont, where residents form a community of interest with the Black residents of South East Queens. It also unnecessarily includes the Jamaica Estates area.

DISTRICT 10 (Central Brooklyn and South Brooklyn) – Common Cause’s District 10 cracks the traditionally Black communities of Crown Heights and Prospect Heights. In addition, it splits Canarsie, an emerging Black community and excludes two additional areas with substantial Black population—namely, the South East area of Brooklyn and Coney Island. Common Cause’s District 10 also fails to follow the Black residential migration towards South East Brooklyn.

DISTRICT 11 (Central Brooklyn) – Common Cause’s District 11 cracks both Crown Heights and Canarsie. It also wrongly includes heavily White voting areas of Marine Park and Gravesend.

DISTRICT 13 (South Brooklyn) – Common Cause’s District 13 splits Canarsie and the emerging Black populations in Mill Basin from other Black areas in South East Brooklyn and Coney Island.

DISTRICT 14 (Harlem and the West Bronx)– Common Cause’s District 14 cracks Harlem (which should be included as a whole within a district) by splitting West Harlem from Central Harlem and East Harlem and instead including Riverdale, a predominately White community in the West Bronx.

DISTRICT 15 (Harlem and South and Central Bronx)– Common Cause’s District 15 cracks Harlem by splitting West Harlem from Central Harlem and East Harlem.

DISTRICT 17 (North Bronx and Westchester) – Common Cause’s District 17 combines Williamsbridge with Rye and Mamaroneck, two predominately NH White communities,

rather than following the historical pattern of combining Williamsbridge with Mount Vernon and adjacent areas that have elected a Black state representative.

II. ASSEMBLY MAJORITY MAPS

DISTRICT 6 (Western Long Island) - Assembly Majority District 6 improperly splits the Rockaway peninsula.

DISTRICT 8 [UNITY MAP 10] (Central Brooklyn and South Brooklyn) Assembly Majority District 8 splits off Black communities of Mill Basin and Coney Island from similar communities in Southern Brooklyn. It instead pairs these communities with the West Side of *Manhattan*, including the Upper West Side and joins them to dissimilar communities in West Brooklyn like Boro Park and Bay Ridge.

DISTRICT 10 (Central Brooklyn and South Brooklyn) - Assembly Majority District 10 removes the Black community of Coney Island and the emerging Black community of Mill Basin.

DISTRICT 11 (Central Brooklyn) - Assembly Majority District 11 cracks East Flatbush.

DISTRICT 15 (Harlem, Upper West Side and Queens)- Assembly Majority District 15 excludes Rikers Island.

DISTRICT 17 (North Bronx and Westchester)- Assembly Majority District 17 cracks Black communities of interest by splitting Co-Op City and Black areas in Southern Westchester from the Bronx's Williamsbridge area.

III. KOLB ASSEMBLY MINORITY MAPS

DISTRICT 5 [UNITY MAP 6] (Western Long Island) Assembly Minority District 5 cracks the Black communities in Queens by removing the Rockaways from Jamaica and bordering South East Queens. Instead, it includes the Five Towns area within the district.

DISTRICT 8 [UNITY MAP 15] (Harlem, Northern Manhattan, Upper West Side and Queens) - Assembly Minority District 8 excludes the Inwood community of Northern Manhattan, increases the area from the Upper West Side, and includes an increased area of Western Queens.

DISTRICT 10 (Central Brooklyn and South Brooklyn) - Assembly Minority District 10 cracks Flatbush/East Flatbush and removes Black communities in Southeast Brooklyn, instead including White areas of Carroll Gardens, Boerum Hill and Brooklyn Heights.

DISTRICT 11 (Central Brooklyn) - Assembly Minority District 11 cracks Flatbush/ East Flatbush.

DISTRICT 12 (NorthEast Brooklyn Red Hook Sunset Park, Chinatown) Assembly Minority District 12 destroys the traditional district where a Latina has been elected, and replaces it with a highly questionable “minority district.”

DISTRICT 15 (North Bronx /Westchester) - Assembly Minority District 15 splits Co-Op City by placing one part of it in 15 and the other part in 16. In addition, it also includes all of Eastchester, which has a NH White population of 87%, as opposed to the Unity Plan which instead includes Greenburgh which only has a NH White population of 67%.

DISTRICT 16 [UNITY MAP 17] (North Bronx and Westchester) - Assembly Minority District 16 cracks Black communities of interest by splitting Co-Op City from the Williamsbridge area, Mount Vernon and New Rochelle.

IV SENATE MAJORITY

DISTRICT 5 [UNITY MAP 6] (Queens Western Long Island)- Senate Majority District 5 improperly splits the Rockaway peninsula.

DISTRICT 9 [UNITY MAP 11] (Central Brooklyn)- Senate Majority District 9 removes Southeast Brooklyn’s Black communities of Mill Basin and Coney Island, instead including the heavily White area of Park Slope.

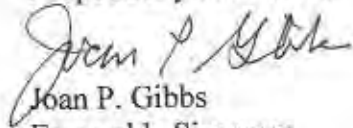
DISTRICT 10 [UNITY MAP 11] (Central Brooklyn and South Brooklyn) - Senate Majority District 10 removes Mill Basin and Coney Island communities and, instead, *by a thin neck*, includes Bensonhurst area.

DISTRICT 14 [UNITY MAP 15] (Harlem, Upper West Side and Queens)- Senate Majority District 14 **cracks Harlem into three districts**-- District 12 West Harlem, District 14 Central Harlem and District 15 East Harlem.

DISTRICT 17 (North Bronx, Westchester and Orange) - Senate Majority District 17 cracks Black communities of interest by splitting the Williamsbridge area from Co-op City and Southern Westchester’s New Rochelle and Yonkers areas. Instead, it joins Williamsbridge with Greenburgh via a thin neck thru most of Westchester and adding Orange County.

In conclusion, the Court should reject the proposed plans of Common Cause, the Assembly Majority, the Assembly Minority, the Senate Majority and the Rose Intervenors (see Plaintiffs-Intervenors Ramos’ Response to Congressional Redistricting Plan, pages 7-9) as their adoption would serve to dilute the votes of Black voters in violation of Section 2 of the Voting Rights Act.

Respectfully submitted,



Joan P. Gibbs

Esmeralda Simmons

Center for Law and Social Justice

Medgar Evers College

1150 Carroll Street

Brooklyn, New York 11225

(p) (718) 804-8893

(f) (718) 804-8833

joanpgibbs@hotmail.com

JG: 4191



**Korean Americans for
Political Advancement**

STEERING COMMITTEE

■ JIM BAEK | Co-Chair

jim.baek@kapany.org

■ BRIGHT LIMM | Co-Chair

bright.limm@kapany.org

■ CHRISTINA CHANG

christina.chang@kapany.org

■ STEVEN CHOI

steven.choi@kapany.org

■ JENNIFER KIM

jennifer.kim@kapany.org

■ SUE MI KO

suemi.ko@kapany.org

■ MONA LEE

mona.lee@kapany.org

■ GRACE MENG

grace.meng@kapany.org

■ DAVID NG

david.ng@kapany.org

■ JOHN PARK

john.park@kapany.org

Statement of Bright Limm, Korean Americans for Political Advancement (KAPA), to the United States District Court for the Eastern District of New York

Presented at:

Court Proceeding Before Magistrate Judge Mann
Courtroom 4E-North
120-55 Queens Blvd, Kew Gardens, NY

Monday, March 05, 2012

Good afternoon. My name is Bright Limm. I am the President and Steering Committee Co-Chair of Korean Americans for Political Advancement (KAPA), a nonprofit and politically independent advocacy organization founded in 2006 and based in New York City. KAPA advocates a broad policy platform that includes matters of political and civil rights. We are a membership organization, and the majority of our dues-paying members are from the boroughs of Queens, Manhattan, and Brooklyn.

KAPA is also a founding member of ACCORD, the coalition of 13 Asian American organizations that have come together to advocate, with a unified voice, on the issue of redistricting for New York's 2012 State Assembly, State Senate, and Congressional district lines.

In this statement, I present KAPA's opinion on the proposed congressional districts that pertain to the Queens-County neighborhoods of Flushing, Bayside, and Elmhurst, and I explain why KAPA recommends the adoption of the "Unity Map" proposed jointly by AALDEF, LatinoJustice/PRLDEF, and the Center for Law and Social Justice of Medgar Evers College.

1. Prioritizing the Preservation of Communities of Interest

KAPA recognizes that the task of drafting district maps is a complex one, particularly in areas as diverse as the county of Queens. We acknowledge that different experts may reasonably disagree on the precise boundaries of proposed congressional districts, and that the satisfaction of all federal and state statutory and constitutional requirements still permits substantial variation among lawful proposals. Thus, the differences among the proposals submitted by the parties in this case ultimately reflect different priorities among other considerations.

In evaluating the relative merits of each proposal, KAPA asks this Court to prioritize the principle of preserving communities of interest. We believe that among all of the traditional principles of redistricting, the principle of keeping communities of interest whole within a given district ought to be given the greatest weight in order to protect the voting rights of citizens residing in those communities. In particular, we believe

that prioritizing this redistricting principle is essential to the protection of the voting rights of minority communities.

To identify Asian American communities of interest within New York City, particularly within Queens, we strongly recommend that the Court utilize the excellent fieldwork and analysis performed by AALDEF, which is also a key organizational member of the ACCORD coalition. KAPA has closely studied both the methodology and the findings of AALDEF's Community of Interest Survey ("Attachment B" of AALDEF's Feb. 29 Submission to the Magistrate Judge). We find AALDEF's methodology to be rigorous and its conclusions fully in accord with KAPA's own demographic research and field operations. In addition, and on a similar note, we strongly support the data maps and analysis provided by Common Cause New York, particularly in its analysis of Queens. (A sample of Common Cause New York's work regarding Queens demographics is available at <http://www.citizenredistrictny.org/2011/09/queens/>.)

KAPA hopes that the Court will employ the information provided by AALDEF and Common Cause New York to ensure that the communities of interest defined therein are protected by the new district lines from vote dilution.

2. Flushing, Bayside, and Elmhurst¹

In Queens, many communities of interest either have substantial Asian American populations or are comprised primarily of them. Flushing, Bayside, and Elmhurst are three such communities of interest that also exhibit commonalities among one another. The Unity Map's Proposed CD5 best preserves these three communities and appropriately groups them together.

Flushing. As we define it, the community of Flushing is bordered on the west by the Van Wyck Expressway, the north by 32nd Avenue and 27th Avenue, the east by Utopia Parkway and 189th Street, and the south by the Long Island Expressway.

Bayside. As we define it, the community of Bayside is bordered on the west by the Clearview Expressway, the north by 33rd Avenue and 33rd Road, the east by the Cross Island Parkway, and the south by 73rd Avenue.

Elmhurst. As we define it, the community of Elmhurst is bordered on the west by 58th Street, the north by Roosevelt Avenue, the east by Junction Boulevard, and the south by a combination of about a dozen roads that together create a slant in a slightly southeastern direction from 58th Street to Junction Boulevard.

Flushing is at once a residential community, a booming commercial center, an icon of New York City culture, and an unmistakable community of interest. Members of the Flushing community share many common interests, and much of this commonality derives from their being primarily a community of immigrants. According to the 2010 Census, more than 65% of the total population of Flushing are immigrants, and of this group, 70% were from Asia (with China, Korea, and India as the primary countries of origin). The majority of Flushing households who speak an Asian language are linguistically isolated, as are a third of the community's Spanish-speaking households. Thus, language access is a crucial common interest.

This largely immigrant community has in turn created a distinct and vibrant local economy dominated by small businesses. According to the U.S. Census Bureau, three-quarters of the more than five thousand businesses in Flushing employed fewer than five workers in 2009, which was a significantly greater share than in the rest of New York State. In addition, Flushing has seen an increase in the number of businesses and jobs that outpaces the

¹ KAPA affirms the definitions of Flushing, Bayside, and Elmhurst articulated by AALDEF in its documents entitled "Asian American Neighborhood Boundaries" ("Attachment A" of AALDEF's Feb. 29 Submission to the Magistrate Judge) and "Communities of Interest Survey" ("Attachment B" of its Feb. 29 Submission to the Magistrate Judge).

rest of Queens and New York City as a whole; for example, in 2010, the number of jobs in Flushing increased at a rate of 3.1 percent, while the rest of the City only saw 0.7 percent growth. Similarly, wages have also increased in Flushing while lagging in the rest of the borough and city. During the period from 2008 to 2010, wages in Flushing rose by 16.9 percent, outperforming the rest of Queens which experienced a 1.3 percent decline. The majority of businesses were concentrated in four sectors: retail trade, other services (e.g. personal services and auto repair), health care and social assistance, and construction.²

Flushing residents also share common interests in housing, transportation, employment, and community development, and many of these interests overlap with those of residents of Bayside and Elmhurst. For a concise summary of many of these common interests, please see Attachment B (“Asian American Communities of Interest Survey in New York City”) of AALDEF’s February 29 Submission to the Magistrate Judge.

In sum, KAPA believes that not only are Flushing and Bayside communities of interest in their own right, but also that they should be grouped together in the same legislative district whenever possible. We also believe that Elmhurst shares sufficient characteristics to be grouped together with Flushing and Bayside in a congressional district.

We hope that this Court will concur with the view of KAPA and the twelve other organizational members of ACCORD that all of the congressional redistricting proposals submitted to the Court, only two proposals – (1) the “Unity Map” submitted jointly by AALDEF, LatinoJustice/PRLDEF, and the Center for Law and Social Justice and the (2) proposal submitted by Common Cause New York – preserve the Asian American communities of interest in Flushing, Bayside, and Elmhurst.

While KAPA supports the proposal offered by Common Cause New York with respect to the communities of Flushing, Bayside and Elmhurst, when looking at each proposal as a whole, we prefer the Unity Map proposal because, in our view, the Unity Map better preserves communities of interest in other proposed congressional districts. In particular, Common Cause New York’s Proposed CD6 divides a section of Ozone Park, whereas the Unity Map’s proposed district for this area keeps Ozone Park whole.

3. Recommendations

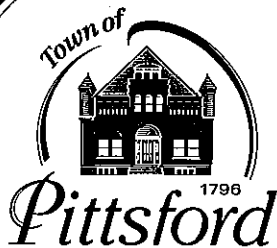
For the foregoing reasons, KAPA offers this Court the following two specific recommendations:

Recommendation #1: We ask that this Court adopt the Unity Map proposed jointly by AALDEF, LatinoJustice/PRLDEF, and the Center for Law and Social Justice of Medgar Evers College, and in particular that the Court adopt the Unity Map’s Proposed CD5.

Recommendation #2: In the event that this Court does adopt the Unity Map, or a slightly modified version thereof, we ask that the Court adopt the proposal offered by Common Cause New York.

Thank you very much for your time and consideration.

² “An Economic Snapshot of Flushing, Queens,” Office of the New York State Comptroller, September 22, 2011, available at: <http://osc.state.ny.us/press/releases/sept11/092211.htm>



March 2, 2012

United States District Court
Eastern District of New York
Redistricting Commission

Your Honors:

The Town of Pittsford has been a vital asset to the success and prosperity of Monroe County. As Supervisor of the Town of Pittsford, I have experienced first-hand the benefit of having one Congressional representative representing our Town.

The current Senate proposal places a portion of the Town of Pittsford in a district that only represents two towns within Monroe County. By this action, the interests of the residents will be split by district lines. By placing a portion of Pittsford in Congressional District 27, the Senate is creating a divide between Pittsford and other geographic regions within the district. While the majority of Pittsford is composed of commercial and residential districts, the majority of Congressional District 27 is made up of rural and agrarian communities. Being a minority within the proposed district, this portion of Pittsford runs the risk of being under-represented.

One of the greatest assets to the Town of Pittsford is the school district consisting of 6100 students from Pittsford, Perinton, Penfield, Mendon and Brighton. Pittsford is a member of the Monroe County School Board Association which advocates for Federal regulation and funding to benefit local schools. If Pittsford were to be separated from Monroe County by a Congressional District, it could negatively affect our education system.

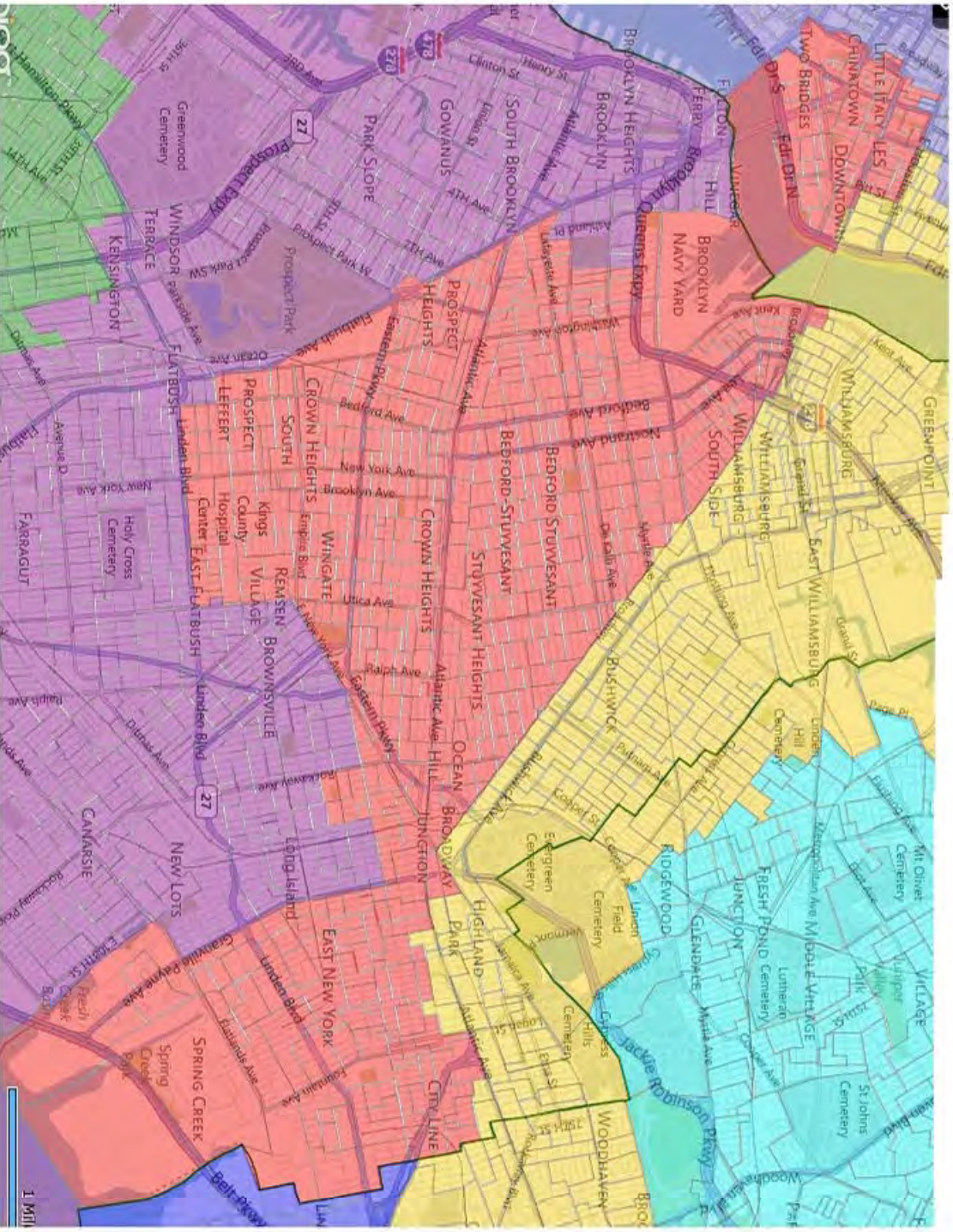
I believe giving our town one voice is the most important aspect of the redistricting process. The interests of Pittsford will be better represented by a Congressional District that is located primarily within Monroe County versus a district that stretches all the way to the Pennsylvania border.

Very truly yours,

William A. Carpenter
Supervisor
Town of Pittsford

WAC: lmd

District 4
old district 10

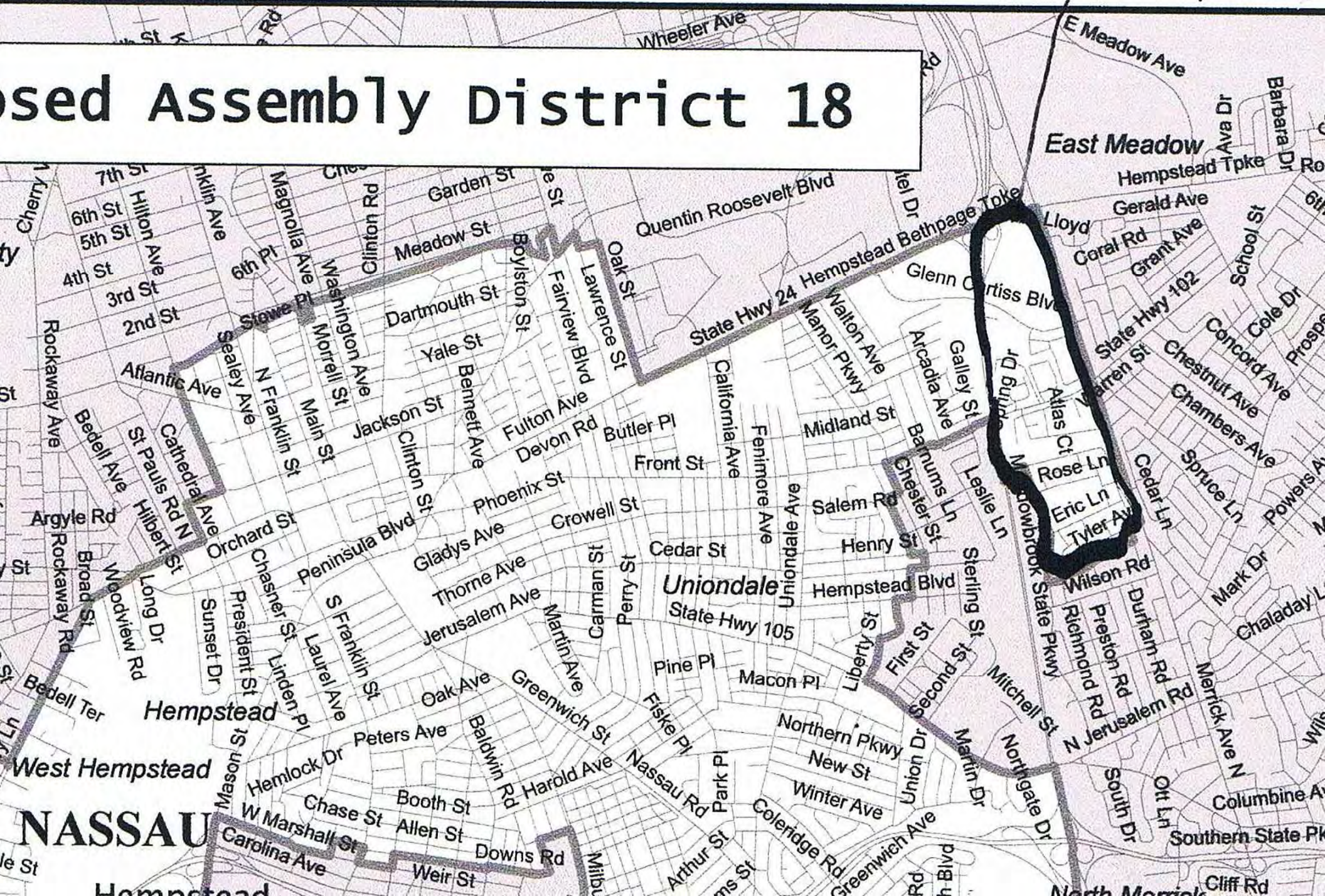


district 4 census

CD 4		
Total Population		
All	Pop	%
Tot	707,204	
Wh	135,759	(19.2)
Bl	366,274	(51.8)
Hisp	122,810	(17.4)
Asn	65,233	(9.2)
Nat	1,694	(0.2)
Oth	15,444	(2.2)
Voting Age Pop		
18+	Pop	%
Tot	531,808	
Wh	96,928	(18.2)
Bl	278,565	(52.4)
Hisp	89,342	(16.8)
Asn	54,729	(10.3)
Nat	1,250	(0.2)
Oth	10,994	(2.1)

18-818-8

Proposed Assembly District 18



March 1, 2012

Magistrate Judge Roann L. Mann
United States District Court
225 Cadman Plaza
East Brooklyn, New York 11201

Re: State Legislative Redistricting
East Meadow District, Assembly District 18, Election Districts 81 and 82

Request: Please put Assembly District 18, Election Districts 81 and 82, which house the award winning School District, Barnum Woods (East Meadow) back into the 17th Assembly District, which will overwhelmingly represent East Meadow.

Dear Judge Mann:

I am a resident of Assembly District 18, Election District 81, the majority of which is comprised of Senior Communities. I am the Elected Democratic Committeewoman for Assembly District 18, Election District 82.

Ten years ago the above two election districts (18 – 81 and 18 -82) were part of the 17th Assembly District. They are both located in East Meadow and when the redistricting was done, those were the only districts in East Meadow that were placed in the 18th Assembly District (Uniondale and Hempstead). This made no sense and the new maps are doing the same thing, dividing a community and placing an Elementary School in an Assembly District (18th) that children do not attend.

I ask only for this small correction to allow us to be with the East Meadow community, of which we share the same address and community interests.

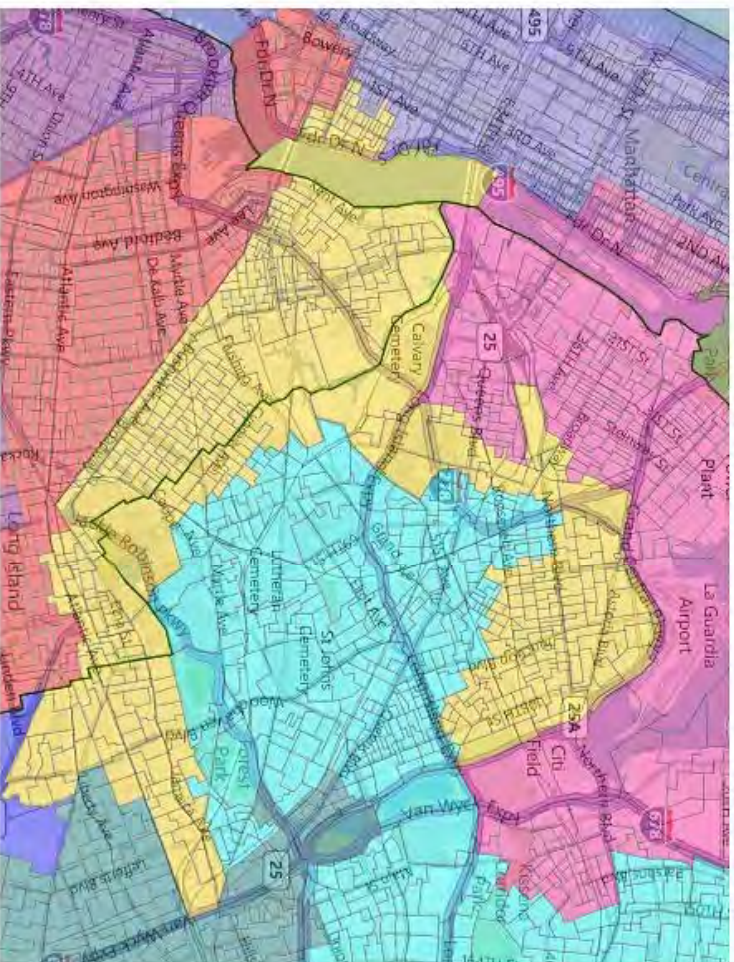
I have downloaded the following maps: Maher.17AD.pdf and Maher.18thAD.pdf.

Thank you.

Sincerely,

Patricia M. Maher
335 Spring Dr.
East Meadow, New York 11554
516-833-5078
516-661-8124

district 5 old district 12



district 5 census

CD 5		
Total Population		
All	Pop	%
Tot	728,714	
Wh	135,900	(18.6)
Bl	67,423	(9.3)
Hisp	415,885	(57.1)
Asn	87,961	(12.1)
Nat	1,708	(0.2)
Oth	19,837	(2.7)
Voting Age Pop		
18+	Pop	%
Tot	567,242	
Wh	122,153	(21.5)
Bl	51,799	(9.1)
Hisp	307,324	(54.2)
Asn	70,532	(12.4)
Nat	1,065	(0.2)
Oth	14,369	(2.5)

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court – Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

6 March 2012

Dear Judge Mann –

I respectfully submit this letter commending this honorable Court’s consideration of important factors in drawing congressional redistricting maps. I urge this Court to recommend its Proposed Plan to the Three-Judge Panel on Monday, March 12.

Despite New York being a difficult state to draw lines in, due its unique geography, highly diverse communities, and Voting Rights districts, this honorable Court did a remarkable job.

While not addressed in my initial letter, I thank the Court for keeping the black and Hispanic communities in Western New York within the same congressional district. The proposed plan also maintains the integrity of upstate counties by grouping them into same congressional district.

Redistricting should not be used to rig electoral outcomes favoring any race, national group, political party or incumbent official. Congressional seniority is an issue best left in the hands of voters to decide.

Happily, the Court dismissed misguided efforts and plans creating racially “separate but equal” congressional districts. The integrity of the Voting Rights Act and living up to our national creed— “that all men are created equal”— are more important. This Court is in no way anti-Hispanic or anti-Semitic as some disappointed advocates quietly allege.

The Court’s redistricting plan results in 27 districts that:

- Contain populations that are equal as required by law;
- Are reasonably compact and contiguous;
- Unite communities of interest; and
- Are free of overt partisan advantage.

Congressional redistricting should be based on demographics and geography, not age, personality or politics. This plan allows voters to decide the electoral fates of their incumbent congressional representatives.

I respectfully endorse the Proposed Plan as the recommendation of this Court to the Three-Judge Panel.

Respectfully, submitted by

Michael Benjamin

Former Member of Assembly

Bronx - 79

Re: Proposals on redistricting in New York State.

Redistricting needs to be done in such a way that the two major parties each have a good representation. Otherwise there is not an honest cross section of voter concerns and issues in that district. If a district is heavily in favor of one party what would the election look like? There needs to be more partisanship even starting at the voter level. Different ideas and policies need to be debated. Voters need to be open to opposing viewpoints and not simply vote because they have always voted a certain way.

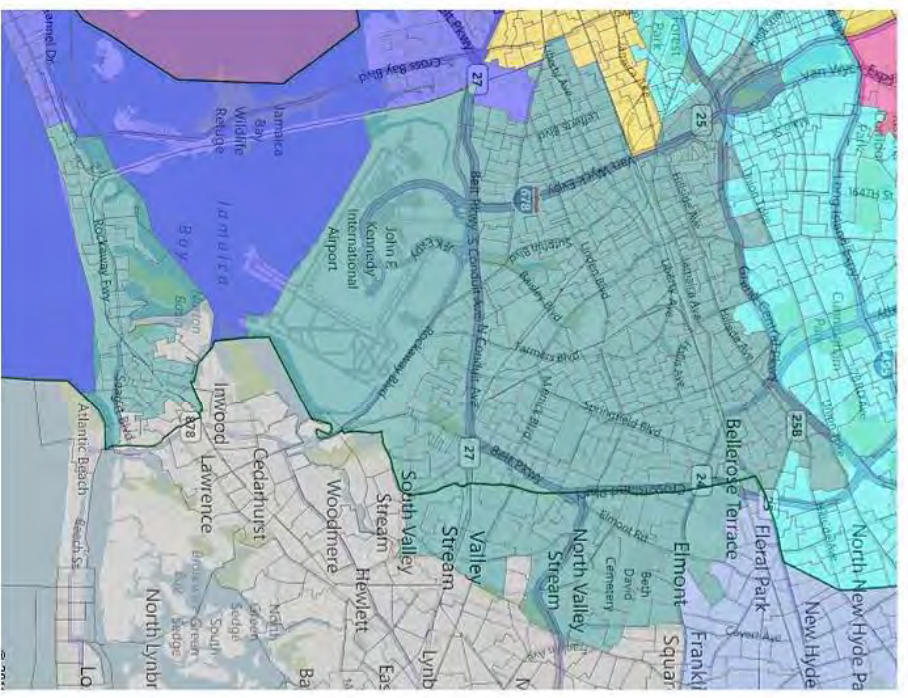
Helen Mierzwa

204 Emann Drive

Camillus, NY 13031 315 487-1229

Helenm2001@msn.com

district 6



district 6 census

CD 6		
Total Population		
All	Pop	%
Tot	708,090	
Wh	71,435	(10.1)
Bl	354,366	(50.0)
Hisp	129,996	(18.4)
Asn	97,164	(13.7)
Nat	4,056	(0.6)
Oh	51,073	(7.2)
Voting Age Pop		
18+	Pop	%
Tot	543,205	
Wh	62,776	(11.6)
Bl	269,567	(49.6)
Hisp	95,085	(17.5)
Asn	74,992	(13.8)
Nat	2,481	(0.5)
Oh	38,304	(7.1)



Monroe County Legislature
Office of the Republican Majority

March 2, 2012

Judge Reena Raggi
Judge Gerard E. Lynch
Judge Dora L. Irizarry

Your Honors:

Our number one priority as elected officials is to serve our constituents, the taxpayers, of our districts. As part of this responsibility we are charged every ten years with redistricting, a challenging task by any measure.

After seeing a draft of the Congressional District that will encompass most of Monroe County – we have a concern. Our great Town of Greece that we represent in the Monroe County Legislature is split between two separate Congressional Districts under the proposal by the Assembly Majority.

The Town of Greece has always had a strong sense of community pride. The residents of Greece are proud of where they live, whether it is supporting our local sports teams in our Greece Central School District or being involved in our neighborhood organizations. Not only are we active in Greece, but in other areas of Monroe County, including the City of Rochester. The constituency of Greece has more in common with those in the City of Rochester and the Town of Irondequoit than a rural Town like Hornell in Steuben County. The geographic location is also a concern of ours. Why take a town as far north as Lake Ontario and include it in a district with towns as far south as the Southern Tier.

Not only are we tied by geography and community interest but we share similar economic and social interests. A town and county, represented by a single Congressperson, is better situated to benefit in competition for grants, obtaining fair representation and in providing a unified front in pursuit of changes to federal policy.

In an era where we cannot afford duplication of services, having more than one representative to a town seems ineffective. Streamlining our government is the most efficient and cost effective solution we have to our current economic situation.

It is clear that the Town of Greece and Monroe County is a tight knit community. As citizen legislators, we are one of the governments closest to the people. We hope you consider our suggestions throughout your redistricting process.

Sincerely,

Richard Yolevich
Legislator – District 1

Fred Ancello
Legislator – District 6

Rick Antelli
Legislator – District 7

Jeffery McCann
Legislator – District 19

Robert Colby
Legislator – District 20

Tony Micciche
Legislator – District 26



Monroe County Legislature
Office of the Republican Majority

March 2, 2012

Judge Reena Raggi
Judge Gerard E. Lynch
Judge Dora L. Irizarry

Your Honors:

After having gone through redistricting this past year, we understand the difficulties that occur when trying to protect the interests of residents. We have tried to make sure that our towns are represented by people with similar views on issues.

Residents within the Town of Pittsford have actively been following the redistricting process at the Federal level and it is their desire for the entire town to be represented within one congressional district, as it is currently. By breaking up the town into multiple districts the citizens are at risk of being divided by contrasting representation.

The Town of Pittsford has been a vital asset to the success and prosperity of Monroe County. The entire Town is currently represented in one district that encompasses nine other towns within Monroe County. The current Senate proposal places a portion of the Town of Pittsford in a district that only represents two towns within Monroe County. Additionally, the proposed Senate map would split the Town of Pittsford among two congressional districts. By this action, the interests of the residents will be fractured by district lines.

Pittsford is a close-knit community with like-minded individuals who share similar values and beliefs. By placing a portion of Pittsford in Congressional District 27, the Senate is creating a rift between Pittsford and other geographic regions within the district. While the majority of Pittsford is composed of commercial and residential districts, the majority of Congressional District 27 is made up of rural and agrarian communities. Being a minority within the proposed district, this portion of Pittsford runs the risk of being under-represented.

We believe giving our town one voice is the most important aspect of the redistricting process. The interests of Pittsford will be better represented by a Congressional District that is located primarily within Monroe County versus a district that stretches all the way to the Pennsylvania border.

Sincerely,

Anthony Daniele
Legislator - District 10

Karla Boyce
Legislator - District 5

John Howland
Legislator - District 13

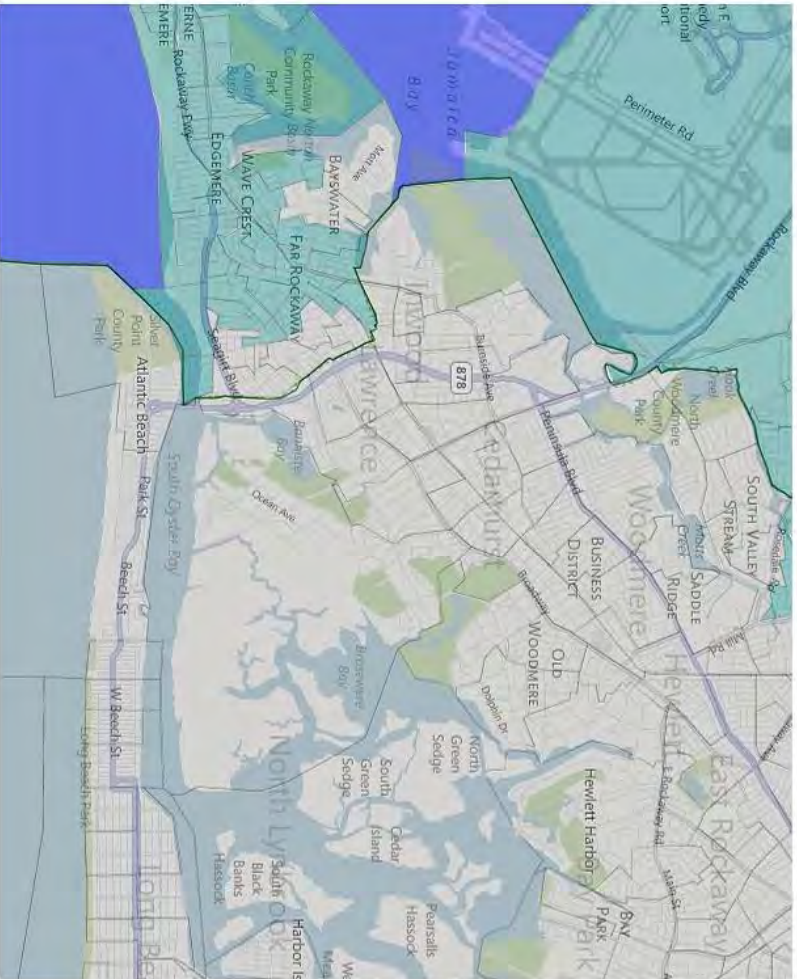
**district 7
old district 3**



district 7 census

CD 7		
Total Population		
All	Pop	%
Tot	705,992	
Wh	561,526 (79.5)	
Bl	31,411 (4.4)	
Hisp	78,940 (11.2)	
Asn	24,370 (3.5)	
Nat	583 (0.1)	
Oh	9,282 (1.3)	
Voting Age Pop		
18+	Pop	%
Tot	542,246	
Wh	440,078 (81.2)	
Bl	22,749 (4.2)	
Hisp	55,272 (10.2)	
Asn	18,677 (3.4)	
Nat	380 (0.1)	
Oh	5,090 (0.9)	

district 7 close up



district 8



district 8 census

CD 8		
Total Population		
All	Pop	%
Tot	729,054	
Wh	518,080	(71.1)
Bl	31,611	(4.3)
Hisp	72,291	(9.9)
Asn	87,659	(12.0)
Nat	710	(0.1)
Oh	18,703	(2.6)
Voting Age Pop		
18+	Pop	%
Tot	651,804	
Wh	466,538	(71.6)
Bl	28,445	(4.4)
Hisp	62,072	(9.5)
Asn	80,919	(12.4)
Nat	631	(0.1)
Oh	13,199	(2.0)

district 9

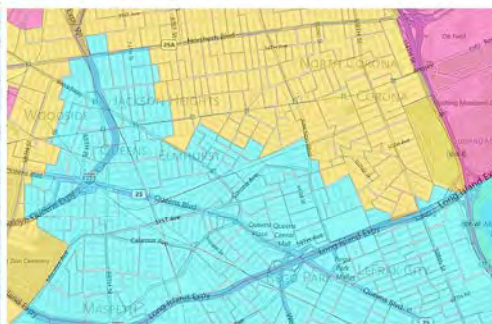
district 9 census



Total Population		
All	Pop	%
Total	733,482	
Wh	302,391 (41.2)	
Bl	26,209 (3.6)	
Hispanic	144,002 (19.6)	
Asn	233,892 (31.9)	
Non	931 (0.1)	
OH	14,139 (1.9)	

Voting Age Pop		
18+	Pop	%
Total	289,441	
Wh	103,647 (35.8)	
Bl	31,379 (10.8)	
Hispanic	111,492 (38.5)	
Asn	187,509 (64.8)	
Non	546 (0.2)	
OH	11,148 (3.9)	

district 9 close up



Orthodox Alliance for Liberty

March 2, 2012

BY ECF

Honorable Roanne L. Mann

United States Magistrate Judge

United States District Court

Eastern District of New York

225 Cadman Plaza East

Brooklyn, New York 11201

Re: Proposed Redistricting of Ethnic Communities in Kings, Queens and Nassau counties

Favors v. Cuomo, No. 1: 1:11-cv-05632-DLI-RR-GEL (E.D.N.Y.)

Honorable Judge Mann:

The Court is poised to determine the political landscape of New York for the next decade. In its wisdom and deep appreciation for the rights affected, the Court has graciously opened the floor for submissions from the public regarding this Congressional redistricting.

We approach the Court as an alliance of advocacy groups on behalf of Orthodox Jews based in the New York City area. Three points we wish to call to the Honorable Court's attention.

I. NEW YORK CONGRESSIONAL DISTRICTS HAVE SEVERLY UNDER-

REPRESENTED ORTHODOX JEWS.

Orthodox Jews share communities of interest that have been egregiously misrepresented in previous and current districting proposals. Over the past three decades

(Cycles) the overall orthodox community district lines (Congressional, Senate and Assembly) have deteriorated from cycle to cycle.

The New York City area includes many neighborhoods that have an unquestionably strong Orthodox Jewish majorities. These neighborhoods include the following: in Kings County, Borough Park, Kensington, Midwood, Gravesend, Marine Park, Crown Heights, Williamsburg and parts of Bensonhurst. In Central Queens, Kew Gardens Hills, Forest Hills, Kew Gardens, Hillcrest, Jamaica Estates and Hollis Hills. In Nassau County, and in its immediate proximity, Lawrence, Cedarhurst, Woodmere, Far Rockaway and Bayswater.

For the most part, districting proposals past and current have grossly denied adequate representation for the interests of Orthodox Jewish voters. Our largest neighborhoods have been divided into oblivion. Adjacent communities have been isolated and subsumed by ethnically, culturally and politically dissimilar neighbors.

As an example, there is a single community of interest for the Kings County neighborhood known collectively by Orthodox Jews as "Flatbush," consisting of Midwood and Gravesend. Nowhere in the United States has a single neighborhood been broken into more than three Congressional districts, outside of "Flatbush." Flatbush, in fact, has been divided into no less than five congressional districts. Borough Park, as well, an undeniable strong concentration of Chassidic, Orthodox Jewish New Yorkers, has also been gerrymandered into political irrelevance.

There is something highly suspect to the fact that Orthodox Jewish neighborhoods have been egregiously isolated and divided. The only rational inference that can be drawn from a single neighborhood being divided into 5 congressional districts, for example, is overt and malevolent intent to deprive political representation to this disfavored ethnic class. The same rationale was the basis for certain Kings county neighborhoods to have been originally included under the supervision of the Voting Rights Act. On January 30, 2002 the New York Times in The obituary for Andrew W. Cooper, 74, Pioneering Journalist, wrote as follows:

"Mr. Cooper left a permanent imprint on the city's political landscape in the mid-1960's as lead plaintiff in a federal lawsuit that challenged the apportionment of Congressional districts in Brooklyn, particularly in Bedford-Stuyvesant.

The neighborhood was divided at the time among five districts, each with a white member of Congress. Mr. Cooper's challenge to what he called "tortuous, artificial and labyrinthine" districting was joined by other litigation, leading to the creation of the 12th Congressional District, and to the election of Shirley Chisholm, the first black woman in Congress."

II. ORTHODOX JEWISH NEIGHBORHOODS SHARE COMMUNITIES OF INTEREST.

Judaism is not only a religion. Jews are an ethnic group and quite arguably a distinct race. For the most part, nearly all Jews share a common ancestor in the forefathers Abraham, Isaac and Jacob. A subset of the Semitic peoples, the Jews or "Hebrews" forms a unique group of people that have kept genetically distinct through the course of over three thousand years.

Of the larger racial group of Jews in general, Orthodox Jews in specific make up a unique and distinct class. They alone place primary importance on guarding those key principles that have kept the Jewish people a distinct entity over the course of millennia. An outlook that places a central role on the study and performance of the Torah's commandments includes abiding by the rules that have kept the Jews a distinct demographic class. These rules include regulations on diet, socialization as well and spiritual practice that are keyed to preventing this small minority from being subsumed by gentile neighbors.

Far from being representing merely a commonality of political objectives, Orthodox Jews share common, unique and distinct sets of priorities that are markedly different from nearly all other racial, ethnic or cultural groups. For example, there is a commonality of interest amongst Orthodox Jews for the foreign policy stance of the United States *Vis a Vis* Jews living in the land of Israel, as well as domestic proposals that affect parochial education, and a specific, common set of principles on social issues.

III. PROPOSED DISTRICTS FOR ORTHODOX COMMUNITIES AND IMMEDIATE NEIGHBORS.

We submit to the court our proposal for Congressional district maps for the Orthodox Jewish communities of the New York City and Long Island area. These maps fully accord and comport to the Voting Rights policies of community interest, demographic, and compactness. Also

included are proposed maps for their immediate neighboring districts. Our proposal for neighboring, non-Orthodox Jewish districts is to show that our proposed redistricting to better reflect representation for Orthodox Jewish neighborhoods in no way negatively impacts neighboring non-Jewish neighbors.

We would respectfully call the Court's attention to the fact that these lines of association are not based on voting patterns for particular political parties. As an example, the exact same constituency that turned out in high percentages in the recent NY-9 special election for the Queens County Orthodox Jewish community of Kew Gardens Hills, simultaneously elected both Republican Bob Turner for Congress along with Democrat Michael Simanowitz for State Assembly, by nearly the exact same margins.

NY-2

The neighborhoods we have included in our map for the new 2nd congressional district, currently consists of parts of the 8th, 9th, 10th, 11th, 12th, and 13th congressional districts. Our proposed District 2 unites for the first time the Jewish neighborhoods of Boro Park, Midwood, Kensington, Gravesend, and the Russian Jewish neighborhoods of Brighton Beach, Manhattan Beach, Homecrest, and Sheepshead Bay. It also includes parts and or the neighborhoods of Bensonhurst, Bergen Beach, Coney Island, Gerritsen Beach, Marine Park, Mill Basin, Sea Gate, and Sunset Park, many of which have a substantial orthodox community. These neighborhoods are compact, contiguous, and are mostly communities of interest while giving Southern Brooklyn for the first time a congressional district of its own. This even-handed proposal has been stymied in previous districting by clearly partisan gerrymandering.

NY-1

The neighborhoods we have included in our proposal for the new 1st congressional district, consists of that which is currently labeled the 13th congressional district, including all of Staten Island, Bay Ridge, Dyker Heights, parts of Bensonhurst, all of Bath Beach, and extends into Broad Channel, Breezy Point, the Rockaways, Howard Beach, and parts of Lindenwood. This map united communities of interest based on ethnicity and religion, and for the first time puts Bay Ridge, Dyker Heights, and Bath Beach all into one congressional district, and in one whole district while also keeping Broad Channel, Breezy Point, the Rockaways, and Howard Beach united in one district. The 13th congressional district is made up almost exclusively of its current district.

It's important to have communities of interest such of Staten Island, Howard Beach, Breezy Point, Broad Channel, Dyker Heights, Bay Ridge, Bath Beach, and parts of Bensonhurst because these communities should have the opportunity to elect a congressional member who represents there views, understands there issues, and knows their concerns. Many of these neighborhoods already share the same elected officials in city and state government, and it is important to have a strong representative who unites these communities of interest to work together with those elected officials in city and state government on behalf of the neighborhoods in this map. Never before have we had a district that fully includes the neighborhoods of Bath Beach, Dyker Heights and Bay Ridge and this map is a fair, non-partisan map that is based on communities of interest rather than voting patterns.

NY-3

This district similar to the 11th congressional district. It takes in the African American neighborhoods of Canarsie East Flatbush, Flatbush, and the different neighborhoods of "Brownstone Brooklyn". While still keeping it's status as a majority African American district and keeps for the most part neighborhoods completely united.

NY-4

This district similar to the 10th congressional district. It takes in the African American neighborhoods of East New York, Bedford-Stuyvesant, and Crown Heights, and takes in all of Chinatown. It further Unites the only 2 Orthodox Jewish communities (Williamsburg and Crown Heights) in Brooklyn outside of Southern Brooklyn in to 1 congressional district. Despite the later 3 neighborhoods it still remains a majority African American district.

NY-5

This district is based off of the 12th congressional district and is able to be a 57.1% Hispanic district.

NY-6

This district takes in the African American parts of Far Rockway and South East Queens (Jamaica) and some African American parts of Nassua along the Queens-Nassau border. The 2 parts are connected together via Kennedy Airport and the Jamaica bay. This is a majority African American district.

NY-7

This is a Primarily a South Shore Long Island district that also adds the Jewish communities of Bayswater and Far Rockway. The Jewish community of Far Rockway and Lawrence are right next to each other and in most aspects are 1 community. Since the city Lines have been crossed in a few other parts if the city we find it deplorable that these 2 communities which share many intuitions are split in two.

NY-8

This district keeps its Manhattan side and takes in very similar neighborhoods on the East Side.

NY-9

This district tries to unite all the Jewish and Catholic neighborhoods of Central Queens into one district and is very similar to the old NY 9.

NY-10

This district combines the old NY 7 and NY 14.

NY-11

This district is almost identical to NY 1.

NY-12

A North Shore district that takes in part of Northern Queens.

NY-13

A Central Long Island district.

NY-14

A majority Hispanic district that is very close to the old NY 13.

NY-15

Almost identical to the current NY-16.

NY-16

A somewhat new district that has a African American plurality. While talking in the Growing Orthodox community of Riverdale.

CONCLUSION

The current districting of the Orthodox Jewish neighborhoods in the New York City and Long Island area, as well as the maps proposed by the New York State Senate and Assembly majorities are untenable. The sizable, distinct and ethnic and racial group of Orthodox Jews has been systematically deprived of just representation in the U.S. Congress. This Orthodox Alliance for Liberty implores the Honorable Court to correct an egregious wrong and restore a full voice for New York's Orthodox Jews in the U.S. Congress.

We thank the Court for its kind invitation to submit our proposal, and for honorably carrying out its sacred mission to preserve our nation with the rule of law.

Respectfully submitted,

The Rabbinical Alliance of America

p. 718.871.4543

Dovid Z. Schwartz

Community Guardians Group

Flushing, NY

(917) 780-6632

Rabbi Nosson Leiter

HelpRescueOurChildren.org

Monsey, NY

Orthodox Alliance for Liberty

March 4, 2012

BY ECF

Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Correction to Contact Information

Proposed Redistricting of Ethnic Communities in Kings, Queens and Nassau counties
Favors v. Cuomo, No. 1: 1:11-cv-05632-DLI-RR-GEL (E.D.N.Y.)

Honorable Judge Mann:

As a correction, our March 2, 2012 correspondence to the Court contained an error in the contact information for one of the senders. Please note that the correct telephone number for Dovid Z. Schwartz of the Community Guardians Group is (917) 680-6632. Email is also available at cgg@zehjournal.com. Thank you for your kind attention.

Respectfully submitted,

THE ORTHODOX ALLIANCE FOR LIBERTY

By

Dovid Z. Schwartz, Director of the Community Guardians Group

(917) 680-6632

cgg@zehjournal.com



STATEMENT OF OCA-NY

Elizabeth OuYang, President, OCA-NY

March 5, 2012

Good afternoon. My name is Elizabeth R. OuYang, President, OCA-NY.

Background on OCA-NY

Founded in 1976, OCA-NY is a non-profit civil rights organization dedicated to promoting and advocating for the political, economic, and cultural rights of Asian Americans in the five boroughs of New York City. In the area of voting rights, OCA-NY has conducted naturalization clinics, voter registration drives, co-sponsored candidates forums, participated in “get out the vote” campaigns, and led census educational trainings. OCA-NY is a founding member of ACCORD, a recently formed Asian American coalition of concerned organizations on redistricting.

OCA-NY’s Position on Congressional District Lines

OCA-NY supports Plaintiff-Intervenors Lee’s plan that endorses the Unity Plan. Congressional District 12 keeps the community of interest that exists between Manhattan’s Chinatown and Sunset Park together and Congressional District 8 keeps intact the community of interest with a large Asian population in Bensonhurst. The Common Cause Plan (CD12) also keeps Manhattan’s Chinatown and Sunset Park together and its Congressional District (7) links Northern Dyker Heights with Bensonhurst.

I am a voting resident of the current congressional district 12. Prior to serving as president of OCA-NY in a volunteer capacity, I was appointed as a special assistant to the U.S. Commission on Civil Rights where I researched voting rights issues. In 1996, I was a staff attorney at the Asian American Legal Defense Fund and was one of the principal attorneys that intervened on behalf of Peter Lau and John Kuo Wei Tchen, in the lawsuit, *Diaz, et al. v. Sheldon Silver, et al.* in a challenge to Congressional District 12 before this Court. The court found that the Manhattan Chinatown community and Sunset Park should be kept together as a community of interest in the redrawn district.

There continues to be many shared interests and concerns between the Asian American community in Manhattan’s Chinatown and Sunset Park. In terms of crime, many students of Asian descent are targets of physical violence and verbal bullying in both Sunset Park and Chinatown Manhattan. Both neighborhoods share the same ethnic media circulations and contain a high percentage of people who face language barriers and need access to social services with translators. In Chinatown Manhattan, 74% of Chinese speakers speak English less than very well; similarly, 80% speak in Sunset Park. Because of language barriers, limited access to English instruction, and high rents in Manhattan, many people *live* in Sunset Park and *work* in Manhattan’s Chinatown in low skilled jobs. In addition to the R and N subway lines, there are several, independently-owned bus shuttles that specifically transport Brooklyn and Manhattan residents back and forth. Sunset Park residents use these buses to commute to work and to drop their children off at the day cares and learning centers in



Manhattan's Chinatown. These transportation lines have become crucial in the past decade, especially after much of the Chinatown Manhattan has been designated as no parking zones. Many community-based organizations in Manhattan's Chinatown have satellite offices in Sunset Park.

Similarly, Bensonhurst contains a large community of Asian Americans with shared interests and should be kept together. Among these interests are similar socioeconomic data, language, and immigration issues.

Richard A Palmer
609 Mertens Ave
Syracuse, NY 13203

Dear: Hon. Carol Bagley

I am a constituent of the 25 Congressional District and I realize that redistricting must be done. I feel our district should be expanded east or west and not south. But I feel that as long as the plan is fair for all, Congressman Buerkle will meet the challenge with great success.

Thank You

Richard A Palmer

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
MARK A. FAVORS, et al.,

Plaintiffs,

-against-

ANDREW M. CUOMO, as the Governor of the
State of New York, et al.,

Defendants.

CV11-5632 (DLI)

-----X
STATE OF NEW YORK :
 :
 : ss.
COUNTY OF NEW YORK :

DECLARATION OF DAVID M. POLLOCK
IN RESPONSE TO SPECIAL MASTER'S DRAFT PLAN

David M. Pollock, hereby declares the following:

1. I am a citizen and resident of the State of New York. I am employed by the Jewish Community Relations Council of New York, located at 225 West 34th Street, New York, New York 10122 and currently serve as its Associate Executive Director and Director of Government Relations.

2. I have previously analyzed and commented on Congressional redistricting plans in 1982, 1992 and 2002, as well as redistricting plans for the New York State Senate

and Assembly and the New York City Council on behalf of the Jewish Community Relations Council of New York and its member organizations.

3. In a previous submission in this matter, I noted that over the past three redistricting cycles, the Jewish Community Relations Council of New York's analyses have been guided by three overarching principles: a) that the interests of the Jewish community can be protected and advanced by sensitive and effective individuals, whether they are Jewish, or not; b) that the district lines affecting Jewish communities should facilitate the election of effective, sensitive and receptive public officials; and c) that districts include, wherever possible a critical mass of Jews; and that district lines keep smaller Jewish communities together so that their electoral clout is not negated.
4. It should be noted that the New York Jewish community is not monolithic and represents multiple communities-of-interest, including, but not limited to: Hasidic, Orthodox, Russian-speaking, Syrian and secular.
5. We are concerned that the heavily-concentrated Russian-speaking communities of Southern Brooklyn (Brighton Beach, Sheepshead Bay, Manhattan Beach, Madison, Bensonhurst, Homecrest and Starrett City) are divided between Districts 8, 9, 10 and 11. In our experience, the relationships between the elected officials and their constituents are improved if a critical mass of voters of a particular community-of-interest is maintained within a district. In our considered opinion they need not be concentrated in a single district so long as a critical mass exists in

each of the districts. It is relatively easy to map the Russian-speakers using ACS data.

6. In a letter to the court, dated March 7, 2012, Michael Carvin wrote, “At the same time, the Proposed Plan fails to respect communities of interest by dividing among a total of four districts (districts 5, 8, 9, and 10) traditional Russian and Jewish neighborhoods in Brooklyn, and traditional communities of interest in Far Rockaway Peninsula, Howard Beach, and Ozone Park, which also include substantial Jewish populations. These are communities that were previously unified and should remain unified in Rep. Turner’s district.”
7. Commenting on Mr. Carvin’s submission, in our opinion, Howard Beach and Ozone Park do not include substantial Jewish populations. The *Jewish Community Study: 2002*, published by UJA-Federation of New York¹ did not analyze those two neighborhoods due to the small sample size.
8. In our opinion the traditional Russian and Jewish neighborhoods of Brooklyn and the Rockaways are communities-of-interest, but need not be amalgamated in a single district so long as the court ensures critical masses of a particular community-of-interest to be maintained in their respective districts.

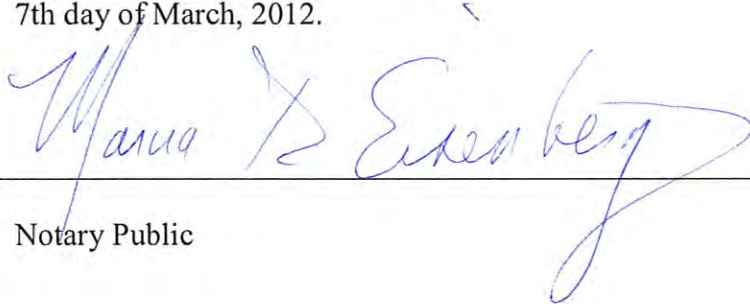
¹ <http://www.ujafedny.org/jewish-community-study-2002/>

Respectfully submitted.



David M. Pollock
Jewish Community Relations Council of New York
225 West 34th Street, Suite 1607
New York, NY 10122
(212) 983-4800, ext. 132
(212) 983-4084 (facsimile)
PollockD@jcrny.org (email)

Sworn to and subscribed before me this
7th day of March, 2012.



Notary Public

MARCIA R. EISENBERG
Notary Public, State of New York
No. 02EI-4687520
Qualified in New York County
Commission 2/28/2014

In my opinion, redistricting should be accomplished by maintaining existing geo-political boundaries (i.e., Counties, Cities, Villages, Towns, and perhaps school districts if it is necessary to fudge the boundary due to population requirements). Neighbors living on adjacent properties (e.g., one in County A and one in County B) are already familiar with those differences and should not be expected to remember that they can vote for a State Office with their neighbor when they can't vote for a County Office with that same person.

Redistricting should attempt to reduce the geographic size of each district as much as possible to reduce the disparity between a representative with one County and another with twelve. Redistricting should be accomplished to maximize use of immediately proximate Counties. Under no circumstances should redistricting be done based on any political party enrollment census or socio-economic, racial or ethnic statistic.

Plan Goals:

1. Maintain or improve ability of protected groups under the Voting Rights Act to elect a candidate of their choice. In particular, an attempt was made to consolidate Asian communities in NYC into as few districts as possible in order to reflect the large growth of the Asian population recorded by the 2010 census. District 7 (formerly district 9) now includes most of the Queens neighborhoods with the largest Asian populations so that 34.7% of the voting age population is Asian. Additionally, district 8, by uniting Manhattan's Chinatown with Brooklyn's Sunset Park and other predominantly Asian neighborhoods in southwest Brooklyn now has a voting age Asian population of over 27%. This plan includes three districts (6, 10, 11) with voting age African-American populations of 49.9 % or greater, two districts (12, 15) with voting age Hispanic populations of over 50% including district 12, which becomes a majority, rather than a plurality, Hispanic district. District 14 encompasses most of the area of the current district 15 in Upper Manhattan while now extending into the Bronx giving it a demographic mix that, if current Demographic trends continue, will convert it to a Hispanic majority seat during the next 10 years. Presently it would have a voting age population that is 30.1% African-American and 46.7% Hispanic. District 5, which includes many areas located in the current district 7, remains a minority-coalition district with non-White residents making up 62.9% of the voting age population.
2. Keep districts as compact as possible while splitting as few towns, cities and counties as possible, and especially avoiding splitting towns or counties between more than two districts. Outside of New York City and Long Island, the map splits just 14 counties (only one of them between more than two districts) and leaves 38 counties undivided. Just 6 towns and two cities north of the New York City line are split between districts.
3. Strike a middle ground between an incumbent-protection map and one that gives no regard to existing Congressional district lines. Most incumbent Members of Congress would retain a district that bears a substantial degree of resemblance to their current seat, although several might have to move to run there as the residence of an incumbent legislator was considered a lower priority than maintaining compactness and creating minority-opportunity districts.
4. Create a map that does not substantially benefit either Democrats or Republicans. The two districts eliminated, 4, and 22, are both held by Democrats. However, District 9 (renumbered district 7), currently held by Congressman Turner becomes somewhat more Democratic as does District 25 (renumbered 23) currently held by Congresswoman Buerkle so that while Democrats are losing two districts they would be likely to pick up two additional districts. Other partisan changes were balanced as well. While becoming much more compact, District 2 becomes about 3 points more Republican while district 20 (renumbered 19) becomes about 3 points more Democratic. Both seats should become more competitive in general elections.

District Overviews, with major population centers highlighted:

1st District: Eastern Suffolk County (Brookhaven and east, plus eastern Islip)

2nd District: Western Suffolk County (Huntington, Smithtown, western Islip, and most of Babylon)

3rd District: Southern and central Nassau and southwestern Suffolk (Long Beach and parts of Hempstead, Oyster Bay, and Babylon)

4th District: Northern and central Nassau and north eastern Queens (Glen Cove, North Hempstead, and parts of Hempstead and Oyster Bay)

5th District: Bronx/Queens (Co-op City, Morris Park, Parkchester, Throgs Neck, College Point, Sunnyside, Astoria). Majority-minority Hispanic influenced seat.

6th District: Queens/Nassau (Jamaica, Far Rockaway, Queens Village, South Ozone Park in Queens/Elmont, Valley Stream in Nassau). 49.9% African American seat.

7th District: Queens (Breezy Point, Ozone Park, Middle Village, Rego Park, Forest Hills, Flushing, Fresh Meadows). A majority-minority Asian influenced seat.

8th District: Manhattan/Brooklyn (West Village, Chinatown, Lower East Side below Delancy St., Brooklyn Heights, Carroll Gardens, Borough Park, East Sunset Park, New Utrecht)

9th District: Manhattan (all of Manhattan between 23rd and 96th Streets, East Village, Stuyvesant Town)

10th District: Brooklyn (East New York, Brownsville, Canarsie, Gravesend, Sheepshead Bay, Homecrest). 50.8% African-American VAP.

11th District: Brooklyn (Flatbush, Bedford-Stuyvesant, Park Slope, Crown Heights, Fort Greene, Midwood). 50.6% African-American VAP.

12th District: Brooklyn/Queens/Manhattan (Williamsburg, Greenpoint, Bushwick, Cypress Hills, Woodhaven, Long Island City, Corona, part of Lower East Side). 52% Hispanic VAP, up from 45% under current lines).

13th District: Staten Island/Brooklyn (All of Staten Island, Bay Ridge, Coney Island)

14th District: Manhattan/Bronx (Harlem, East Harlem, Washington Heights, Inwood, Concourse Village, Morrisania, Claremont). 30.1% African-American VAP, 46.7% Hispanic VAP.

15th District: Bronx (Mott Haven, Longwood, west Soundview, Tremont, Belmont, Bedford Park, University Heights, Laconia, Pelham Gardens). 64.4% Hispanic VAP, 25.5 African-American VAP.

16th District: Bronx/Westchester/Rockland (Riverdale, Williamsbridge, Wakefield, Eastchester in the Bronx; western and southern Yonkers, and western Greenburgh in Westchester; all of Rockland County)

17th District: Westchester (all of central and southern Westchester not included in district 16, all of northern Westchester except Somers, North Salem and parts of Yorktown and Lewisboro)

18th District: Mid-Hudson Valley/Northern New York suburbs (all of Orange and Putnam Counties, southern Dutchess and Ulster County, northern Westchester)

19th District: Catskills, central and upper Hudson Valley (all of Delaware, Sullivan, Schoharie, Greene, Columbia Counties; most of Ulster, Otsego, and Rennselaer Counties; parts of Dutchess and Washington Counties)

20th District: Capital Region (Albany and Schenectady Counties plus parts of Saratoga, Rennselaer, and Montgomery Counties)

21st District: Mohawk Valley/Binghamton area (Broome, Chenango, Madison, Oneida, Herkimer, Hamilton, Fulton, parts of Montgomery and Otsego)

22nd District: North Country/Adirondacks (Clinton, Franklin, Essex, St. Lawrence, Jefferson, Lewis, Warren Counties; northern Washington and Saratoga counties; most of Oswego County)

23rd District: East Fingerlakes/I-81 (Onondaga, Cayuga, Cortlandt, Tompkins Counties, parts of Oswego and Tioga Counties)

24th District: Southern Tier/West Finger Lakes (Wayne, Ontario, Seneca, Yates, Ontario, Schuyler, Chemung, Steuben, Livingston, Allegany, Cattaraugus Counties; parts of Tioga and Wyoming Counties)

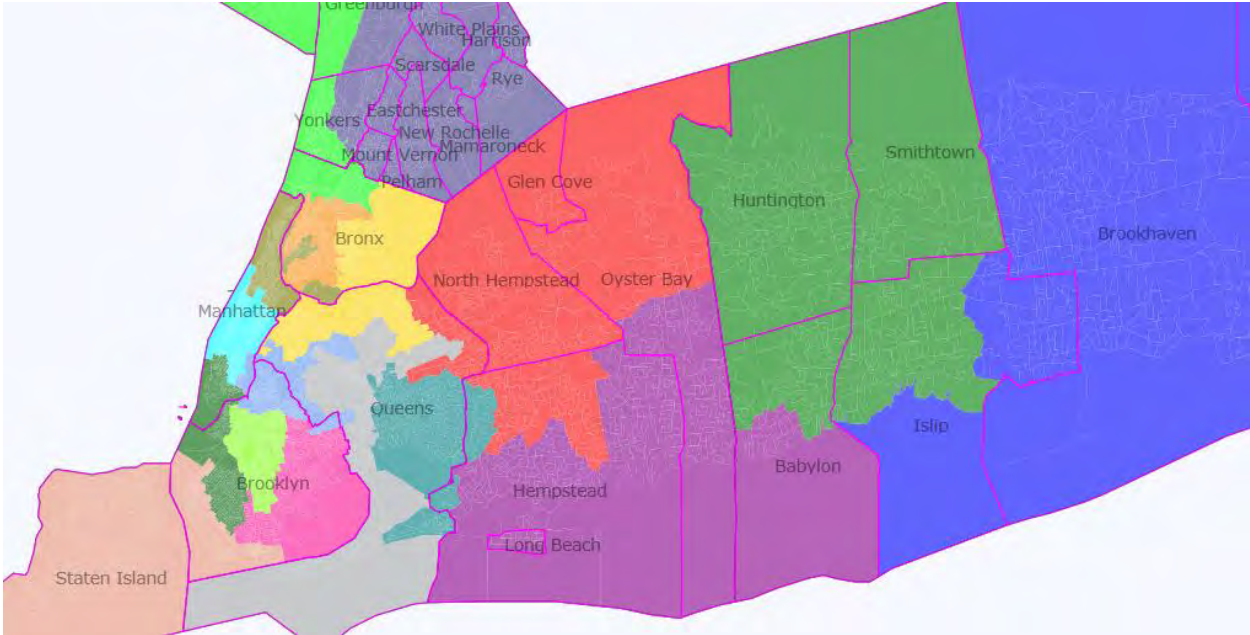
25th District: Rochester Area (All of Monroe County except for towns of Sweden, Clarkson and part of Hamlin)

26th District: Western New York rural areas (Orleans, Genessee, Chautauqua Counties, most of Wyoming County, mostly rural and exurban sections of Niagara and Erie Counties)

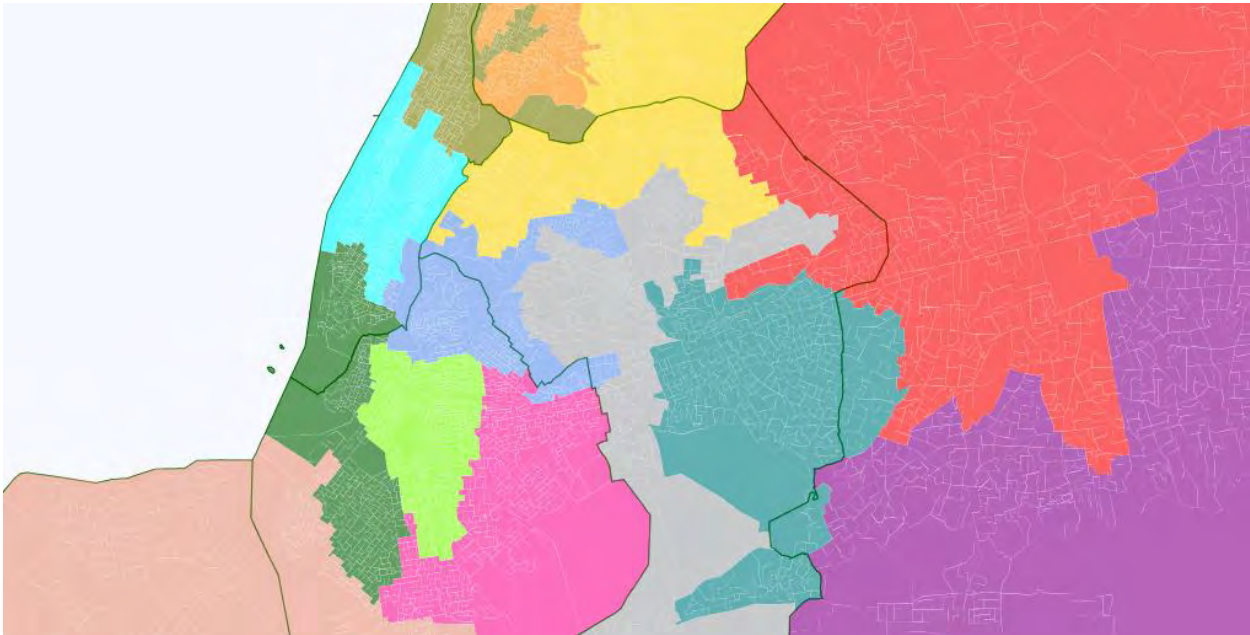
27th District: Buffalo/Niagara Falls metro area (Buffalo, Lackawana, West Senca, Cheektowaga, Amherst, Tonawanda, Grand Island, Niagara Falls)

Note: districts were made as nearly equal in population as possible using the software found on the U MapNY website.

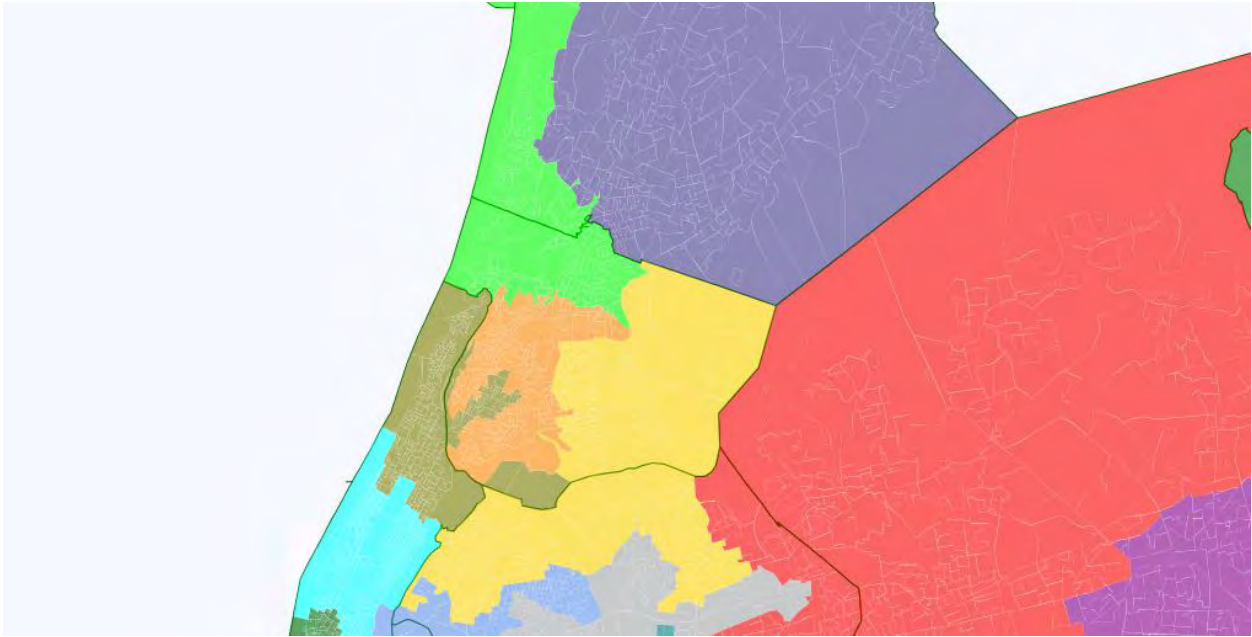
Long Island:



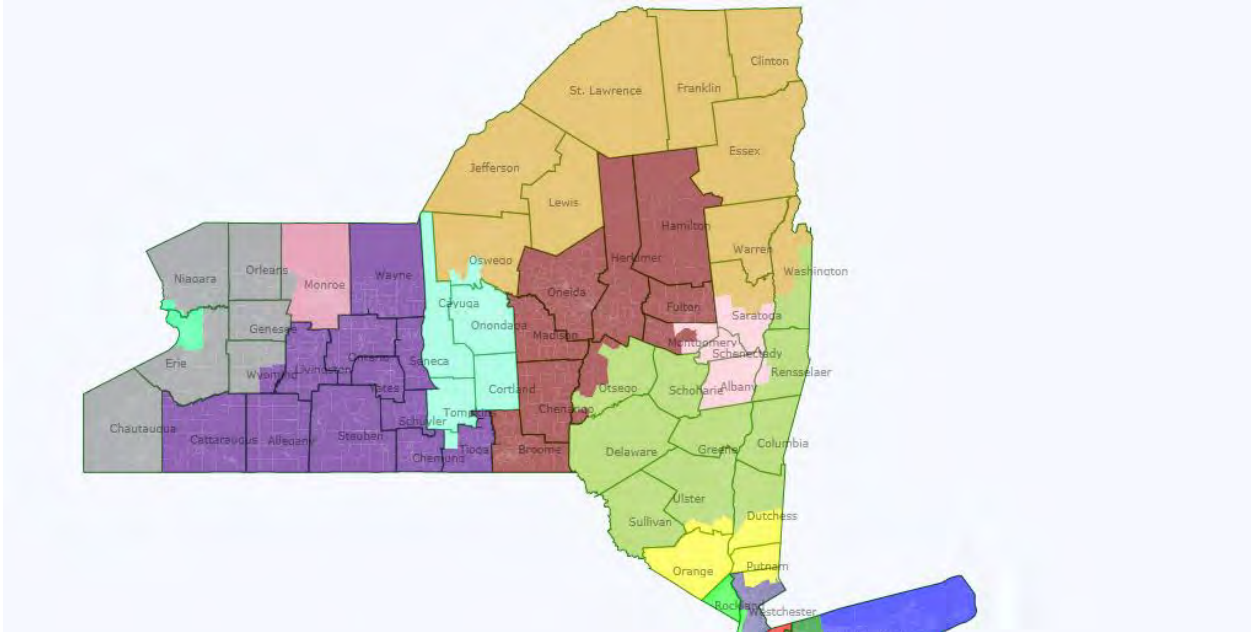
New York City



Northern New York City:



Statewide:





Honorable Judge Roanne L. Mann
United States Magistrate Judge for the Eastern District of New York
225 Cadman Plaza East,
Brooklyn, New York 11201

Honorable Judge Mann;

Thank you for taking on this impossible task and for offering the public an opportunity to not only testify at the hearing on Monday, March 5, but also to comment on the Court's draft lines.

I feel compelled to comment on the division of the Williamsburg and Greenpoint sections of Brooklyn into two congressional districts (the 7th and 12th Congressional Districts) in the draft map released by the Court. These neighborhoods represent a community of interest with a shared set of common issues. I'm afraid that the map proposed by the Court appears to be a racial gerrymander. While I recognize the challenges confronted in upholding the Voting Rights Act protected districts, I beseech the Court to find an alternative solution.

The communities of Greenpoint and Williamsburg have been part of the same congressional district that the Legislature redrew in 1997 as a result of the Diaz case. The Court should not separate these full communities, or sever the majority-Latino Southside of Williamsburg from the Northside of Williamsburg and Greenpoint along racial lines.

Aside from a history of being joined together in the previous 12th Congressional district, these communities share concerns related to the waterfront as a result of their location on the East River adjacent to Manhattan, as well as similar, long-term demographic changes which will impact these communities for decades to come. In addition, there are remarkable commonalities regarding affordable housing, zoning and development, parks and open space amenities, transportation, education, and environmental health.

The neighborhoods of the Southside of Williamsburg, the Northside of Williamsburg, and Greenpoint comprise one single Community District and one single School District. The fact that these communities share one Congressional district has helped neighborhood leaders forge a unified agenda for North Brooklyn that can be embraced by our Member of Congress. I fear that splitting

this community into multiple Congressional districts will exacerbate racial differences and end up pitting neighborhood against neighborhood.

Finally, each of the parties that proposed Congressional lines for your review emphasized their effort to limit counties being split into multiple districts whenever possible. The creation of a new, second tri-borough district, the proposed 12th Congressional District in the Court's map, is unnecessary. The challenge of representing three distinct counties should not be imposed on multiple members of Congress in New York City.

The Court's proposed 7th Congressional District, which stretches across three counties for purposes of preserving a Latino plurality to uphold the Voting Rights Act and linking the Brooklyn and Manhattan Asian communities in one Congressional district, reasonably crosses three boroughs. However, there is no logical argument for placing the Northside of Williamsburg and Greenpoint in the Manhattan and Queens based 12th Congressional District except for the fact that these Brooklyn neighborhoods are majority white. In the Court's proposed 12th Congressional District, the residents of the Northside and Greenpoint would almost surely suffer from less active Congressional representation as a modest appendage to a Manhattan and Queens based district.

I hope you will consider this request to return the communities of the Northside of Williamsburg and Greenpoint to the proposed 7th Congressional District.

Thank you,

A handwritten signature in black ink, appearing to read "Lincoln Restler". The signature is written in a cursive, flowing style.

Lincoln Restler
District Leader and State Committeeman,
50th Assembly District, Brooklyn

510 Tanner Lane
Macedon, NY 14502
March 2, 2012

To Whom it May Concern,

I urge the court to reject the proposed Congressional redistricting plans put forward by both the New York State Assembly and the State Senate.

Both legislative bodies have failed in their duty to agree on any kind of commonsense reapportionment in a timely manner. Redistricting, when conducted by elected officials, will always have an element of politics as each political party seeks to gain advantage: that's unavoidable. New York's redistricting has become a hyper-political process with incumbent Congressman employing lobbyists and neither party seemingly working towards the common good.

These proposed districts were not drawn based on compactness, geography, or commonality of interests, but for purely partisan reasons. In respect to the district I currently represent, these lines were produced with the intention of determining a winner of the election before the race has even begun.

The product of over-politicized redistricting is anathema to most New Yorkers. In the political process of redistricting, Assembly and Senate members have abandoned good governance in the interest of self-preservation, political advantage and personal ambition. They appear to have been swayed by special interests and Albany lobbyists.

The redistricting plans submitted to this court by non-partisan organizations and citizens are uniformly more compact, reasonable and, frankly, set up more competitive seats in Congress, which is surely in the best interests of the people of New York and the United States. The House of Representatives is supposed to reflect the will of the people because Congressmen are required to face re-election every two years. Drawing totally safe Democrat and Republican Congressional districts has the effect of making the House a rest home for career politicians who never face a competitive election.

Again, please turn down the Assembly and Senate redistricting plans in favor of a more common sense approach.

Sincerely,

Matthew T. Ryder

I would like to commend the Eastern District Court of New York for affording citizens the right to contribute to the redistricting process. For too long, Albany has compromised our state by dividing communities of interest for partisan gains. I am an sophomore undergraduate student who has been studying redistricting during my spare time for the past three years; I am very interested in seeing my state prosper with the right representation.

As someone with experience working for candidates both Upstate and Downstate, I feel as though my map considers, to its best ability, communities of interest (COI) and the Voting Rights Act. Out of the twenty-seven districts, there are six true minority-majority districts, three being black-majority and three being Hispanic-majority. This is an improvement over the current map, which has three black-majority districts and one Hispanic-majority. Furthermore, my 8th Congressional District proposal enjoys an Asian plurality. My 17th District places the black communities in Mount Vernon, Yonkers, and the Bronx into one district, making it almost a black plurality district. My Brooklyn-based 10th District has a voting age population (VAP) that is minority-majority. Although the 17th and 10th are not necessarily required to be majority-minority under the VRA, it is still important to have as much minority representation as possible.

Elsewhere, COI are respected, as Upstate has two Buffalo/Buffalo suburbs districts--it's important to keep Buffalo in two districts. We need multiple representatives looking after Buffalo's revitalization. One Monroe County-based district, keeping the Rochester area together. One Southern Tier/Finger Lakes district. One Utica-based district. One Adirondacks/Albany exurbs district. One other Southern Tier/Ithaca/Binghamton District. One Metro Syracuse district. One Capitol Region district. One outer New York exurbs district. Two Westchester-based districts. I also keep one district based on the Upper West and Upper East Sides.

I look forward to this submission, and I hope to testify in person, defending my map. As a young adult, I look forward to New York remaining the best state in our Union, with as best representation as possible.

A Proposal to Redistrict New York

I am a redistricting hobbyist who submitted the following plan to the court. I have no connections to New York Politics; my motivation simply stems from a desire to see the redistricting process produce geographically and culturally coherent, fair districts. I hope you will find the following plan (described fully in Pub-Smith-BlockEq.csv and Pub-Smith-Racial.csv) useful in your deliberations.

Sincerely,

Philip C. Smith

Some notes on this plan:

*Counties are only split for reasons of equal population or allowing minorities to elect a candidate of their choice. Beyond that, I attempted to keep communities of interest together and create compact districts.

* I did not take into account incumbency when drawing this map, though I did favor creating competitive seats when that was a possibility.

* This map has very small deviations because my mapping tool does not allow me to split precincts. A small number (~25) of carefully chosen precinct splits will solve this problem.

District 1:

As this district did not require a large number of changes, I hewed closely to the legislative intent of ten years ago. Eastern Suffolk forms a compact, culturally coherent, and politically competitive district.

District 2:

The remainder of Suffolk County also forms a compact, culturally coherent, and politically competitive district. A small portion of the South Shore was united with Nassau County's South Shore in the 3rd district.

District 3:

The South Shore of Nassau County, including most of the towns of Hempstead, and Oyster Bay form the core of this district. Dividing the North and South shores in Nassau County results in more compact seats after placing the county's heavily African American communities in the majority minority district 5.

District 4:

This politically competitive district covers the North Shore of Nassau County and culturally similar areas in Whitestone, Queens.

District 5:

This African-American majority by voting age population district leaves Queens to allow the African American communities in Nassau County areas like Elmont, Hempstead, and Roosevelt to elect the candidate of their choice.

District 6:

This compact district unites culturally similar areas in South Brooklyn and Queens which have been divided up several ways under the current plan. Orthodox Jewish and Russian-American communities, whose influence was limited under previous plans that divided this area multiple ways, will have a strong influence on this seat.

District 7:

This district covers areas of central Queens. It is a diverse seat with a strong Asian minority population and comprises largely middle class areas of a single borough.

District 8:

A successor to the current Hispanic-opportunity district 12, this seat allows Brooklyn and Lower Manhattan Hispanics to continue to elect the candidate of their choice while forming a much more compact district than its prior incarnation.

District 9:

This seat unites much of the culturally unique borough of Manhattan in a single compact seat.

District 10:

This African American majority district is similar to the current district 10, but now largely unites the culturally similar communities in Downtown Brooklyn like Brooklyn Heights, Park Slope, and Carroll Gardens.

District 11:

This African American majority district is similar to the current district 11; however, to gain population while remaining compact it expands west into the western part of the Borough to take in the diverse communities of Red Hook and Sunset Park.

District 12:

This Staten Island based district did not need major additional population so I hewed closely to the legislative intent of 2002 by adding portions of the Bay Ridge and Dyker Heights neighborhoods.

District 13:

This new majority Hispanic district allows Hispanics in the communities of Corona and Soundview to elect a candidate of their choice in this compact district.

District 14:

This compact, majority Hispanic seat preserves Bronx Hispanics' ability to elect a candidate of choice while also extending that ability to Hispanics living in the Upper Manhattan neighborhoods of Washington Heights and Inwood, just across the Harlem River.

District 15:

This plurality African American district unites the major African American communities in northern New York City, Harlem and Williamsbridge. It does not extend out of the city into Westchester County, avoiding an additional unnecessary county split.

District 16:

This seat is based around inner suburban communities of the outer Bronx and lower Westchester County. Note that the city of Yonkers is united in one seat after many years of being divided in a rather arbitrary fashion.

District 17:

This district encompasses the entire county of Rockland, divided in 3 under the current map, and pairs it with similar suburban areas of Westchester County. I-287 forms a major backbone of this district as a major route for commerce and commuter populations.

District 18:

This politically competitive district covers Hudson Valley communities on the outermost fringes of New York City. It takes note of legislative intent by being relatively similar in form to the present District 19.

District 19:

This politically competitive district covers a diverse set of Hudson Valley Counties south and west of the Albany area. This district has relatively few suburban areas and thus serves as a rural and small city community of interest.

District 20:

This compact seat covers the core of the capital region. Albany, Schenectady, Troy, and their suburbs both form both a unified metro area and sum to the perfect population for a congressional seat.

District 21:

This district is based around the North Country and Adirondack regions. It contains a number of small cities such as Watertown, Plattsburgh, Glens Falls, and Saratoga Springs, which all exert influence but do not dominate the district.

District 22:

The two small metropolitan areas of Binghamton and Utica-Oneida-Rome are united in this district.

District 23:

This district encompasses the core of the Syracuse metropolitan area, and adds a number of nearby small cities. Higher education is a strong economic uniter of this seat as Syracuse, Oswego, and Ithaca are prominent educational centers.

District 24:

This district encompasses rural areas and small towns in west-central New York, including most of the Southern Tier and Finger Lakes regions.

District 25:

This compact district covers the core of the Rochester metropolitan area, staying entirely within the borders of Monroe County.

District 26:

Rural areas of Western New York and outer Buffalo Suburbs are placed together in this seat. This area is relatively culturally homogeneous.

District 27:

Contained entirely within the borders of Erie County, this district covers the core of the Buffalo metropolitan area.

Figure 1. The Downstate Region:



Figure 2. New York City:

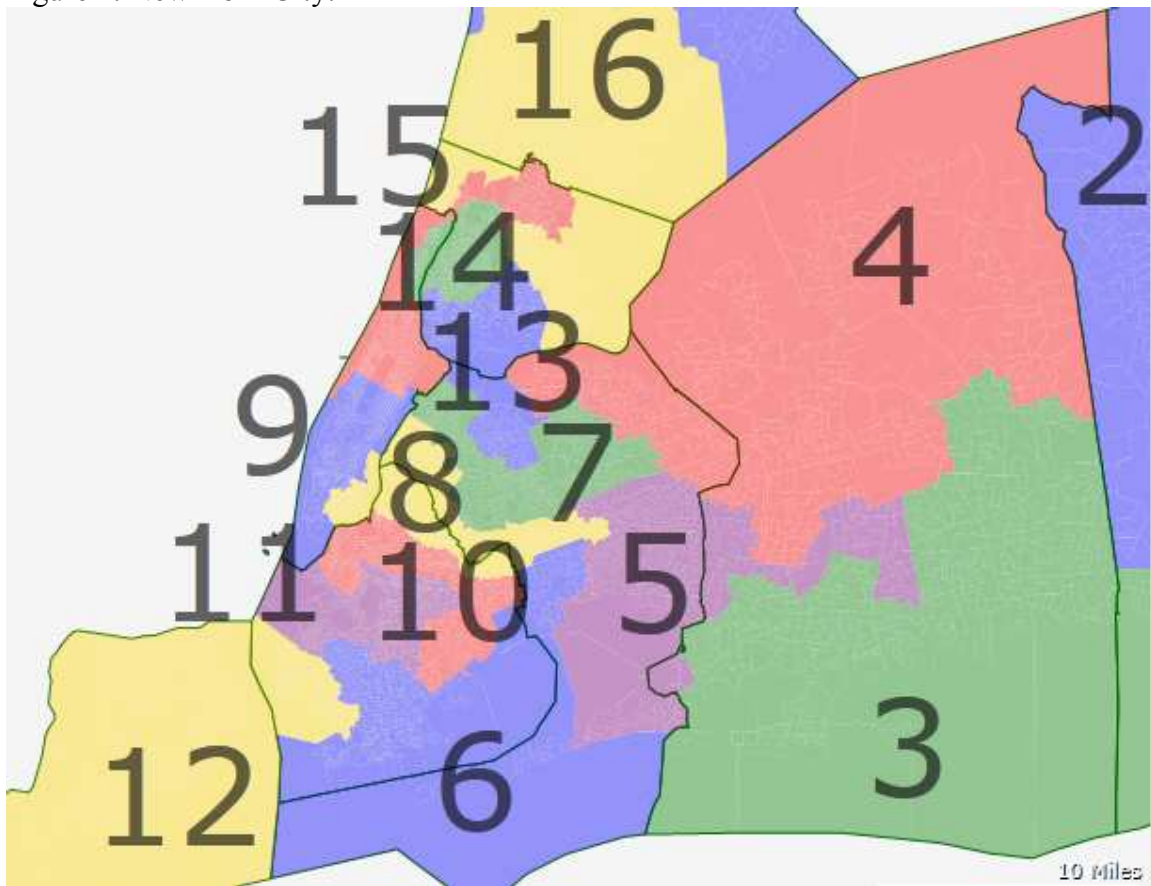
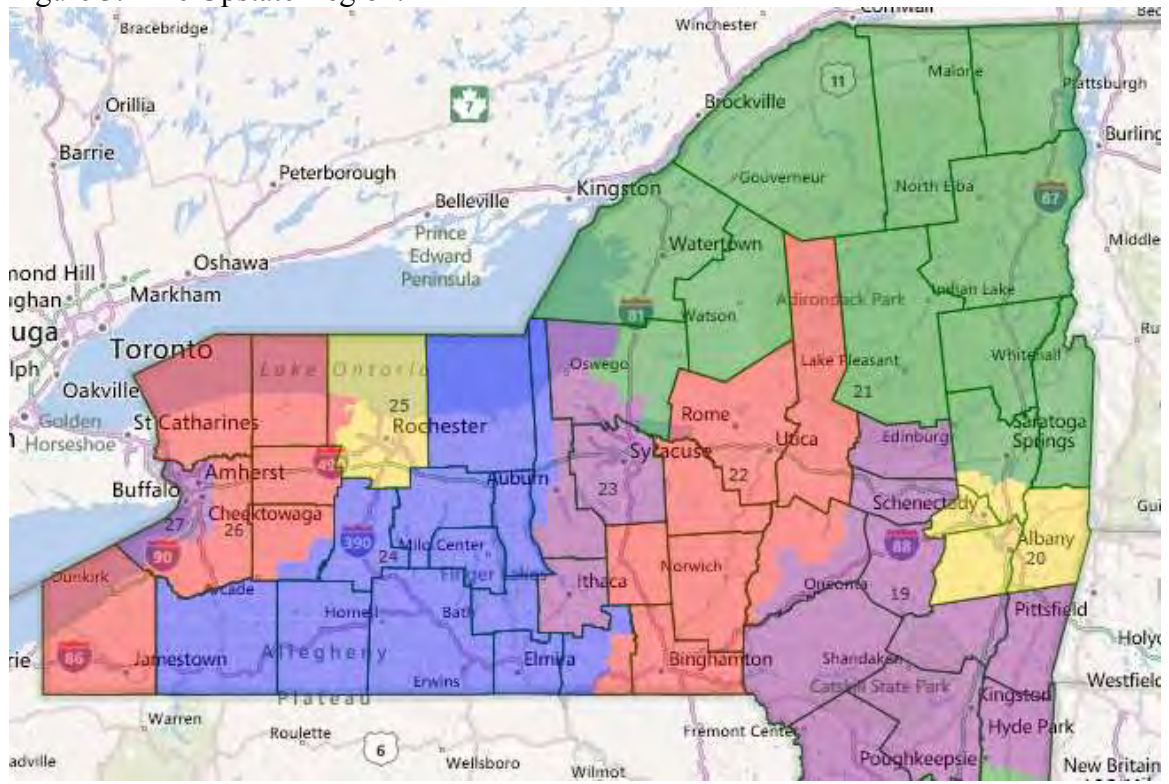


Figure 3. The Upstate Region:





TOWN OF GREECE

One Vince Tofany Boulevard • Greece, NY 14612

Tel.: (585) 225-2000 • Fax: (585) 225-1915

www.greecenyny.gov

March 2, 2012

Dear Redistricting Commission,

Residents within Monroe County and the Town of Greece have actively been following the redistricting process at the Federal level because it is their desire for Monroe County to be represented by one representative focusing on our area. However, the plan put forth by the Assembly Majority splits the Town of Greece between two Congressional Districts, with the majority of the Town of Greece grouped into a rural district.

As Supervisor of the largest Town in Monroe County, I believe we should be included in a Congressional District that represents the Majority of Monroe County. The residents of Greece have more in common with Monroe County Towns such as Irondequoit, Gates, and Chili, than a rural Town like Hornell in Steuben County. Additionally, a town represented by a single Congressperson is better situated to benefit in competition for grants, obtaining fair representation and in providing a unified front in pursuit of changes to federal policy.

I appreciate the opportunity to offer input into the proposed plans. The interests of Greece residents would be better served by being represented by one member of Congress.

Sincerely,

A handwritten signature in black ink that reads "John Auburger". The signature is written in a cursive style with a large initial "J".

John Auburger
Greece Town Supervisor

VOTING RIGHTS for ALL

March 7, 2012

The Honorable Roanne L. Mann
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 12201

Re: Favors v. Cuomo
11. Civ. 5632

Dear Judge Mann:

We represent a broad coalition concerned with protection of the voting rights of residents of New York City. Specifically, the Coalition members are the Dominican American National Roundtable, Hazel Dukes, President NAACP NYS, NY County Democratic Leader Keith Wright, Carl Heastie, Bronx County Democratic County Leader, Congresswoman Yvette Clarke, NYS Senator Adriano Espalliat, NYS Assembly Members Robert Rodriguez, Herman Denny Farrell, Guillermo Linares, and N. Nick Perry, NYC Council Members Robert Jackson, Inez Dickens and Ydanis Rodriguez.

While sincerely appreciating the enormity of the Court's task and the tireless work that underlies the Proposed Plan (as defined in this Court's March 6, 2012 Order), the Coalition members believe that their interests were not adequately represented by the parties and intervenors, and that the Proposed Plan is deficient in several material respects. As a consequence, the Proposed Plan unduly fragments and dilutes minority voting strength and raises serious constitutional and other legal issues.

For example, the Proposed Plan, in pertinent part, appears to give little weight to the principle of community of interest, despite the general consensus that this doctrine is one of the most significant factors to be taken into account in the redistricting process. Several communities of interest in the Proposed Plan have been splintered and segregated into varying districts which will ultimately dilute the political power people of color are meant to enjoy by virtue of the Voting Rights Act.

Reference is hereby made to the submissions of the individual Coalition members submitted in advance of March 5, 2012 for additional examples. In addition, to ensure that their interests are represented going forward and their right to object is preserved, each member has attached hereto a specific objection to the Proposed Plan. See Exhibits ___.

Again, we commend the Court for its efforts in extraordinary circumstances, but respectfully request that it review the Proposed Plan in light of the annexed objections and modify it accordingly.

We thank the Court for its consideration.

IF YOU DON'T VOTE YOU LOSE THE RIGHT TO COMPLAIN

VOTING RIGHTS for ALL

DRAFT

NY County Democratic Committee Leader
Keith L. T. Wright

DRAFT

Bronx County Democratic County Leader
Carl E. Heastie

Dominican American National Roundtable
President, NYS NAACP, Hazel Dukes
Congresswoman Yvette Clarke
NYS Senator Adriano Espalliat
NYS Assembly Member Robert Rodriguez
NYS Assembly Member Herman Denny Farrell
NYS Assembly Member Guillermo Linares
NYS Assembly Member N. Nick Perry
NYC Council Member Robert Jackson
NYC Council Member Inez Dickens
NYC Council Member Ydanis Rodriguez

IF YOU DON'T VOTE YOU LOSE THE RIGHT TO COMPLAIN

Recommended Changes to Special Master CD 13

First, we want to commend the Special Master, Federal Magistrate Roanne Mann for her diligent work in producing a draft plan for 27 Congressional Districts for New York State in short order (while the Legislature continues to ruminate); and for giving parties to *Favors v. Cuomo* and the broader public, the opportunity to offer constructive recommendations for improving upon the Special Master's draft plan.

These recommendations with regards to CD 13 should be understood within the broader context of the state of Black congressional representation within the State of New York. Since the 1982 congressional redistricting round, in a federal court drawn plan (under circumstances similar to today) in *Flateau v. Anderson* with Special Master Robert Patterson, New York has elected four Black congressional representatives: one from Harlem and Northern Manhattan since 1944 (Adam Clayton Powell, Jr. then Charles B. Rangel); in Brooklyn, one member was elected in 1968 (Chisholm), a second seat in Brooklyn was added in 1982; and one from Queens since 1986.

According to the 2010 Census, New York State has grown to the 3.3 million Blacks, the largest Black population of any state in America. Thus based on Black population growth and size, there is no rationale for the retrogression of New York's Black congressional district representation from 4 down to 3 districts, as is the case under the Special Master's current plan, which only creates three CDs thus far with 50% Black VAP, greatly diminishing Black voters' the opportunity to elect candidates of their choice.

There is a way to preserve the core district of Harlem-North Manhattan: minus Washington Heights, 140,000, 75% Hispanic/Dominican, to be coupled with Special Master CD 14. (see Dominican American National Roundtable (DANR) map). North Manhattan is then

coupled with North Bronx (Williamsbridge and Coop City); and the City of Mount Vernon, right over the Bronx County line. This revised CD 13 seamlessly connects these African American and Caribbean American social, cultural et.al. communities of interest; and creates a revised CD 13 that is approaching 50 percent Black voting age population (BVAP). There have been several maps submitted that reflect this ideal; which preserves Black congressional representation in Brooklyn and Queens, preserving four Black congressional representatives for New York.

This revised mapping configuration for CD 13 reflects the current realities of changing demographics and migrating Black populations in New York City. And revised CD 13 also mirrors the Special Master's CD 7 approach, which is a tri-county district combining heavy Hispanic and Asian populations in Brooklyn, Manhattan and Queens, that preserves a plurality (41% Hispanic VAP) Latino congressional district that has elected Hon. Nydia Velazquez, for the past 20 years. In addition the Special Master's CD 15 (64% Hispanic VAP) preserves a second Latino CD wholly in the Bronx, represented by Hon. Jose Serrano.

The DANR proposal to revise Special Master CD 13, adds Washington Heights, Manhattan, to the Mid-Bronx; and finishes up with the Hispanic Corona and College Point neighborhoods in Queens. Very importantly, this creates a third Latino congressional district (+60 percent Hispanic VAP) in New York City in recognition of their growing Hispanic population.

Memo

To: United States Magistrate Judge Roanne Mann
From: Bronx County Leader Carl E. Heastie on behalf of the Bronx
Date: March 7, 2012
Re: An Appeal for Communities of Common Interest in New York City

We are writing to strongly object to your proposed Congressional district composition. In our opinion, the court missed an opportunity to empower communities of interest, one of the key tenets of the redistricting process. The data shows us that we have an opportunity to keep together communities of interest in areas where the court has created divisions.

Specifically, in Districts 12 – 15, the court has not maximized its ability to merge communities of interest. What is not seen in the numbers is a bond that exists between longstanding traditional communities and the existence of newly formed, expanding communities that have more similar characteristics.

With just a few changes, the court could compose new districts that preserve a longstanding, historic African American district, acknowledge the shift and slight migration within a borough of another, and establish and recognize an emerging community seeking to elect a representative that understands the true nature of their communities.

The communities you've included in the 15th District share a common bond with many now included within their borough in District 14. These two districts could merge more seamlessly, and could be shifted to accommodate changes needed to combine communities located in a better constructed 13th District.

The 13th District should be changed to reflect the commonalities within the communities of Harlem, Spanish Harlem and the Bronx. The court should connect these communities, as they are inextricably linked through history. Many of the residents of the Northeast Bronx and Co-Op City actually have family in the communities of Harlem and Spanish Harlem. They grew up in Harlem and still attend church in Harlem.

Simply put, the court should acknowledge the unique nature of these communities and deem them communities of interest. By the numbers, the court should examine and address the dilution of African American votes in the 13th, 14th and 15th Districts. In the

current composition, you are making African Americans take a step backward by dividing the community. In addition, you are denying the Latino community more representation.

It is American tradition to send representatives to Washington to articulate the distinct cultures of their respective districts. Magistrate Mann, you have an opportunity to insure that all New Yorkers can feel as though they have a voice in Washington, one that is not muted by dilution.

Once again, we urge you to reconfigure the lines under the auspices of the concept of communities of interest. It is the right thing to do.

March 7, 2012

The Honorable Roanne L. Mann
Magistrate Judge
United States District Court
Eastern District of New York
22 Cadman Plaza East
Brooklyn, NY 11201

Dear Magistrate Judge Mann:

On behalf of non-party the Dominican American National Roundtable (the "DANR"), and pursuant to the Court's Order of March 6, 2012, we respectfully submit this objection to the "Proposed Plan" (as defined in such Order), insofar as it pertains to proposed Congressional Districts 13, 14 and 15.

The geographic regions covered by these proposed districts include the northern part of Manhattan, the west Bronx and the Corona/ Jackson Heights neighborhoods of Queens, areas that are heavily populated by Spanish speaking residents, and areas in which the Hispanic population has substantially increased since the 2000 census. As the Court will recall, in advance of the hearings on March 5, 2012, the DANR submitted a map that, taking cognizance of the community of interest that binds these neighborhoods, united them into a single, new congressional district. For the Court's convenience, a copy of that map (the "Map") is attached.

In the Proposed Plan, however, the Court rejected the DANR's Map and instead created a fragmented series of districts that, respectfully, "tell [] a tale of disparity not community." See Miller v Johnson, 515 U.S. 900, 908 (1995). Thus, proposed District 13 is largely the District now represented by Congressman Rangel, but a heavily Hispanic portion of the Kingsbridge area of The Bronx has been fused into that District. The areas east of Kingsbridge are divided between the proposed 15th District, in what is now predominantly Congressman Serrano's District, and a proposed 14th District, encompassing Pelham Parkway to I-95, then snaking down to Queens, in what is now Congressman Crowley's District.

As we understand it, this would result in a small numerical Hispanic voting age population ("VAP")

March 7, 2012

Page 2

majority in the proposed 13th District, and a significant non-Hispanic majority in the proposed 14th District. Given the dynamic of the 13th District, with a well-known incumbent and the likelihood that the majority of the actual registered voters (and per force the likely voters in any election) would not be Hispanic, and the less favorable statistics in the 14th District, also represented by a strong incumbent, the Proposed Plan essentially maintains the status quo and does not increase Hispanic representation. In other words, there would still be three districts, with only one likely, as a practical reality, to elect a Hispanic representative, despite the significant increase in Hispanic population in the relevant areas.

This, we respectfully suggest, should result in the Court's taking a second look at the merits of the DANR Map, and that second look should confirm that the DANR Map is a better accommodation of relevant interests than is the Proposed Plan. Preliminarily, it should be noted, since the Court is dealing with covered districts here, that the DANR Map would cause no retrogression. The Proposed Districts 13 and 15 would likely maintain their existing minority representation.

But most importantly, the DANR Map would avoid the fragmenting of a Hispanic community of interest--and the dilution of Hispanic voting strength that is the unavoidable by-product of the Proposed Plan.

The area covered by the DANR Map, though having a 63.5% Hispanic VAP, is now represented by four out of five non-Hispanic congressmen (Mssrs Rangel, Crowley, Ackerman and Engel). But within the new district proposed by the DANR, there are some 13 Hispanic elected legislators, legislators of Dominican, Puerto Rican and Ecuadorian descent, the highest concentration of Hispanic elected officials in any existing or proposed district. This reflects a highly interactive and interdependent community, a community sharing, among other things, a common language, a common religion, and common problems that transcend geography.

These things can not be replicated, for example, by placing or maintaining a large number of Dominican residents in the District currently represented by Congressman Rangel. Those residents would have a closer sharing of interests with the Dominican, Ecuadorian and Columbian communities of Corona/Jackson Heights in respect of language and immigration-related matters, and thus form a natural community of interests.

For the community of interest concept to have any meaning, it must provide a genuine opportunity for the residents of the community to elect a representative of their choice. It is not enough to create two districts that could theoretically elect a Hispanic congressman but which in reality are unlikely to do so. The substantial number of locally elected Hispanic officials in the area covered by the DANR Map reflects a political cohesion that is empirically verifiable. The Proposed Plan does not, or is, at best, speculative in this regard.

It is no accident that the DANR Map does this. It was the product of extensive community outreach and input. On information and belief, an unusually large number of residents of the areas covered by

March 7, 2012

Page 3

the DANR Map testified before LATFOR and other community forums, and were overwhelming in their position that these areas constituted a single community of interest that should be united.

While there has not been time for the kind of in depth analysis that would be most beneficial to the Court, from a redistricting standpoint, the Proposed Plan has some obvious facial deficiencies. For example, the proposed 14th District may be contiguous, but it is respectfully, the antithesis of compactness.

In any event, even though concepts such as compactness and contiguity are legitimate considerations, they should not be extolled over more central considerations. As Chief Justice Warren said in Reynolds v. Sims, 377 U.S. 533, 562 (1964), “Legislators represent people, not acres.” Given the mutually inconsistent nature of many of the factors a court may properly consider in the redistricting context, the DANR respectfully requests that the Court err on the side of the voice of the community. That voice says the northern Manhattan, west Bronx and Corona/ Jackson Heights areas constitute a single community of interest that should be entitled to select a single representative to speak for it in Congress.

Finally, it is ironic but significant that the Proposed Plan unsettles the interests of two groups that the Voting Rights Act is designed to protect. Specifically, as set forth in the submission of Dr. John Flateau on behalf of Manhattan Democratic County Leader Keith Wright, to which the Court’s attention is respectfully commended, the Proposed Plan actually dilutes both Black and Hispanic voting strength.

We are sure that Court does not desire such an anomalous result, and respectfully request it revise the Proposed Plan to adopt the DANR Map.

We thank the Court for its consideration of the DANR’s position.

Respectfully,

/s/ Lance Gotthoffer

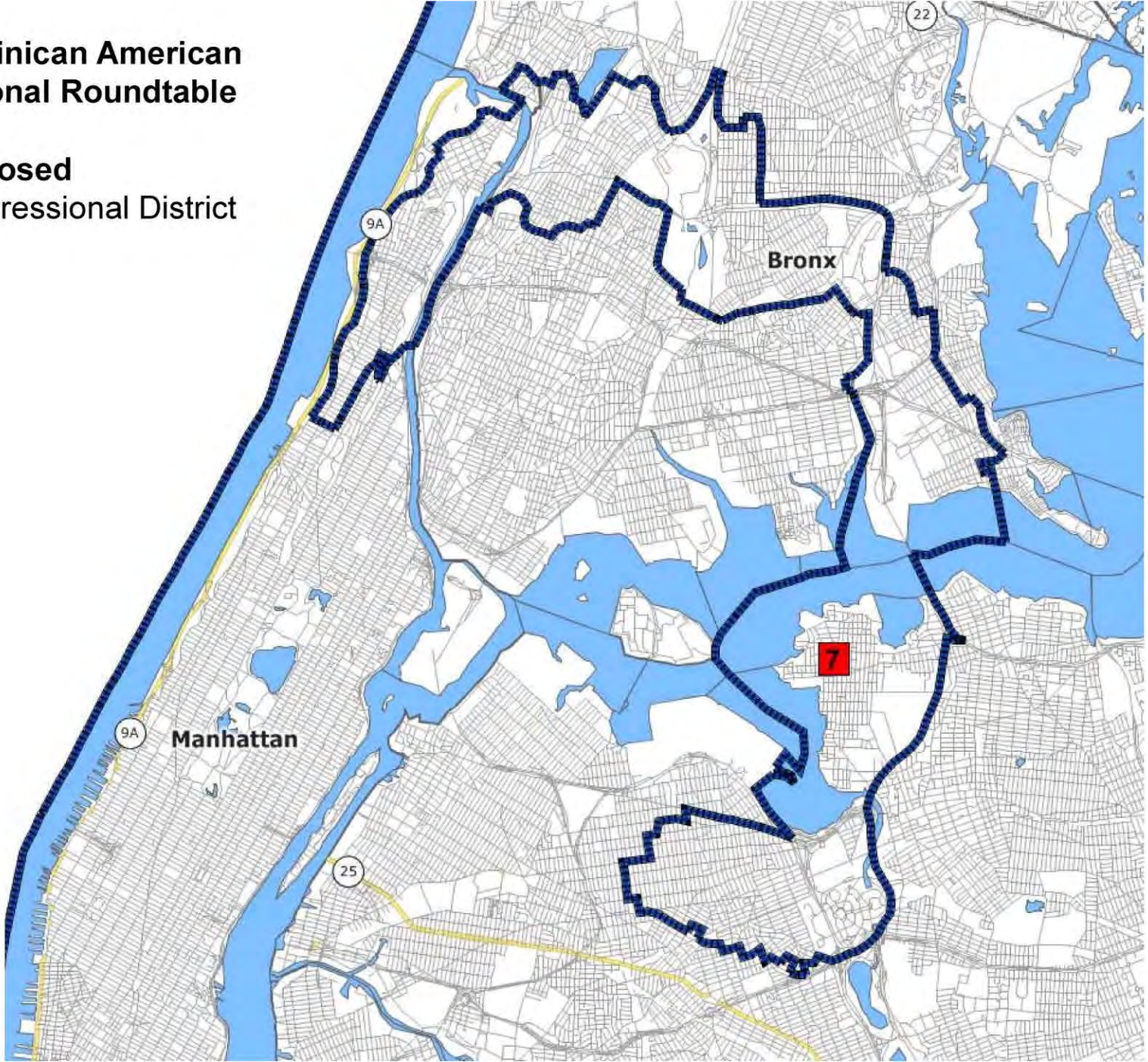
Lance Gotthoffer

Becker & Poliakoff, LLP

Attorneys for Dominican American National Roundtable

**Dominican American
National Roundtable**

**Proposed
Congressional District**



Yvette D. Clarke
Member of Congress

March 7, 2012

Magistrate Judge Roanne L. Mann
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Favors v. Cuomo*

Dear Magistrate Mann:

Thank you for allowing me the opportunity to please the Court with a submission and explanation for a proposed mapping configuration of the current NY-11th Congressional District. I understand that this is a cumbersome undertaking, however, the speed and effectiveness by which the Court is proceeding in this very important matter is admirable. Allowing for public comment to this process furthers the goals of accountability and transparency.

I respectfully submit that the Congressional District 9 (hereinafter, CD9) of the proposed map, as indicated in this Honorable Court's Order to Show Cause, dated March 5, 2012 (hereinafter, the "Proposed District"), does not preserve the core of the 11th Congressional district, maintain communities of interest, and violates the traditional redistricting principle of compactness. Ultimately, this has resulted in a violation of the United States Constitution and the Voting Rights Act of 1965. Communities of interest are fractured and diluted.

The best method to achieve Voting Rights Act of 1965, 42 U.S.C. § 1973 goals, and expand in population would be to maintain communities of interest by increasing in mass to the southeast, uniting communities including, but not limited to **Canarsie, Flatlands, Remsen-Village-Rugby, East Flatbush, Erasmus, Brownsville, Ocean Hill, and Crown Heights**. It is my goal to keep these populations whole and together to ensure that their voting power is not diluted. Keeping these communities together will ensure that these populations have a full and fair opportunity to elect candidates of their choice.

In accordance with the decision of *Shaw v. Reno*, 509 U.S. 630 (1993), race can no longer be the predominant factor in drawing political district boundaries to meet voting rights criteria. Rather, district boundaries must reflect "communities of interest". It is well settled that in redistricting, "manipulation of district lines can dilute the voting strength of politically cohesive minority group member. This may be accomplished by "cracking" a district whereas minority voters may be fragmented among several districts where a bloc-voting majority can outvote them, or by "packing" them into one or a small number of districts to minimize their influence in adjacent districts.

Further, we adopt in totality and incorporate by reference comments regarding CD9, of the Center for Law and Social Justice, dated March 6, 2012 which provides:

“This district [CD9] should honor the east-west orientation of North Brooklyn and the Southeast orientation of the Black communities in Central Brooklyn below Atlantic Avenue. The Brownsville and Flatlands areas should be returned to the CD9 district. The Clinton [sic] Hill and Fort Greene [sic] areas should be removed to CD8. The boundary between CD8 and CD9 could be straightened along Flatlands Avenue.

This is the original VRA (formerly CD11) that was created for Black voters in Brooklyn and first elected Shirley Chisholm to Congress. It has traditionally covered parts of Central Brooklyn that are heavily populated by Blacks: Flatbush, Crown Heights, Brownsville, East Flatbush, Prospect Lefferts Gardens, along with Wingate and parts of Park Slope.”

Preservation of the Prior District

The Court in *Rodriguez v. Pataki*, 308 F.Supp.2d 346, 363 (2004), aff'd 543 U.S. 997, provides that preserving the "cores" of existing districts is a traditional districting principle. (citing, *Marylanders for Fair Representation. Inc. v. Schaefer*, 849 F. Supp. 1022, 1056 (D. Md. 1994) (three-judge court); *Larios v. Cox*, No. 03-CV-693, 2004 WL 299082 (N.D. Ga. Feb. 10, 2004) (three-judge court)). The proposed district does not follow this principle.

Upon a review of an overlay of the present 11th Congressional District and the Proposed 9th Congressional District, it is my observation that the Proposed District is a major departure, geographically, from the prior district. This is in direct violation of the law as interpreted in *Rodriguez*. The Proposed District expanded in mass in the following directions: 1) northwest, encapsulating all of Fort Greene and Clinton Hill; 2) completely eliminated the prior district's eastern corridor (Brownsville and East New York); 3) increased southeast minimally (Remsen Village); and 4) southwest (Midwood and Madison). In order to maintain the core of the present district and recover the loss population, the 11th congressional district must expand southeast towards Canarsie. Unless the expansion of the 11th Congressional District is achieved in the direction that follows the direction of the demographic and geographic shift of the Black Voting Age population of Brooklyn, the district would be diluted and change from a majority-minority district to merely that of an influence district. This is in violation of Section 2 of the Voting Rights Act.

Rather than maximizing upon neighborhoods that presently constituted the district, four (4) additional neighborhoods were included. These neighborhoods are as different ideologically and politically from each other as they are distant. Neighborhoods such as Brownsville and Ocean Hill were completely removed from the prior district. Where a natural progression to the east is apparent, the proposed district disregarded the adjacent proximity and geographic closeness of neighborhoods in favor of fracturing and cracking constituent groups by

neighborhood. Neighborhoods located wholly or partly within the prior district, represent a core constituency that should not be broken up.

If the prior district is altered too drastically, this will lead to voter confusion. Changes of this magnitude will affect the average voter's ability to know who represents them in government, who they should vote for and where polling sites are located. Voter confusion can and will lead to disenfranchisement.

Communities of Interest

By their own admission, Common Cause asserts that the 11th congressional district has a high concentration of immigrants (particularly from the Caribbean) and that the Black population clearly shifted to the south and east. However, Your Honor's proposed map for the 9th Congressional District shifted south, but not far enough east. It shifted south to pick up the following new communities: Homecrest (1.0% NH Black VAPOP), Madison (1.6% NH Black VAPOP), Georgetown and Marine Park (10.6% NH Black VAPOP), while eliminating Park Slope, Gowanus, and Brooklyn Heights. The Proposed Map does not shift far enough eastward to embrace any parts of **Canarsie** which has a high concentration of **Caribbean immigrants** and which shares a community of interest with Prospect-Lefferts Gardens, Wingate, East Flatbush, Farragut, Erasmus, Rugby, and Remsen Village. The attached proposed map followed, to the extent feasible, the migration patterns that the United States Census documented as moving south and east so we could maintain a community of interest and recover the loss population to reach 717,707. It should be noted that immigrants from the Caribbean are largely driving the demographic transformation in Central Brooklyn.

Caribbean-Americans are the fastest growing racial minority group in Brooklyn, New York. Brooklyn presently has the largest Caribbean American population of any municipality in the nation. These findings should be deferred to in making redistricting decisions about which areas to include within congressional districts.

Compactness

We preserve, for the record, our objection to the proposed district CD9 on the basis of violating the traditional redistricting principle of compactness.

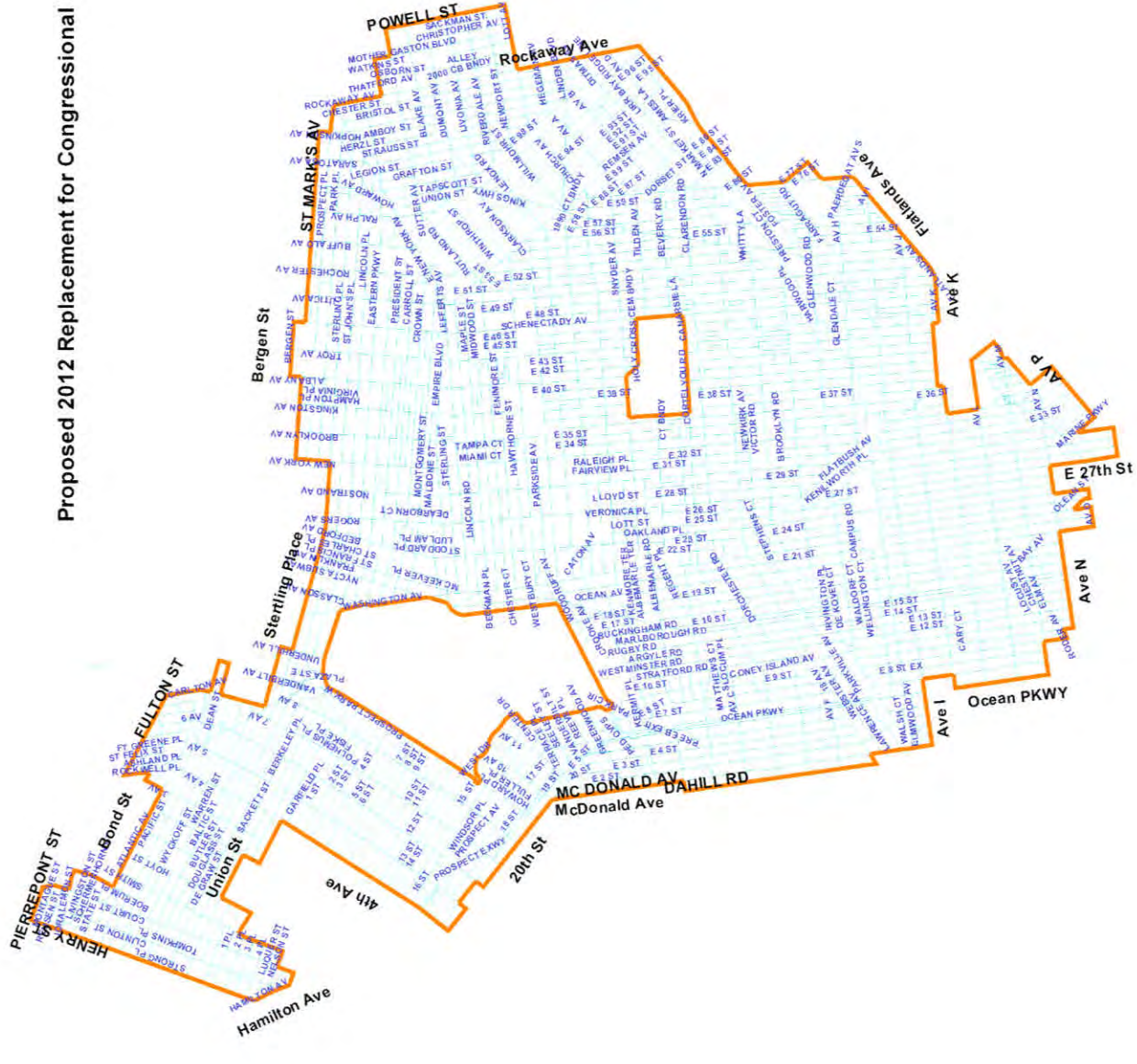
It is respectfully requested that this honorable Court reconsider its proposal for CD9 and replace it in whole, or in part, with the attached map as an adequate alternative mapping configuration for the present NY- 11th Congressional district.

Respectfully submitted,

/s/ Yvette D. Clarke

:lmw

Proposed 2012 Replacement for Congressional District 11



Testimony of the Honorable Robert Williams
Mayor, Village of Elmsford
March 5, 2012

I am Bob Williams, the Mayor of Elmsford, NY, an incorporated village located in Westchester County, within the Town of Greenburgh. I am registered to vote in Greenburgh, enrolled as a Republican.

My constituents and I are currently very happy to be residents of the 18th Congressional District, which includes the majority of Westchester County. And we were very distressed to learn that one of the redistricting plans under consideration would take Elmsford – and all of Greenburgh – out of a Westchester-based district, and connect us instead to Rockland County and the Bronx.

We have nothing against the good people of Rockland and Bronx Counties, but our natural connection is clearly with Westchester, and we are deeply concerned that the interests of Elmsford and Greenburgh would be submerged in a district with such a heavy population tilt to other regions. Furthermore, shifting historic patterns of representation will certainly produce public confusion and discontent, while severing a ten-year relationship between a Member of Congress and tens of thousands of constituents.

Of the options we have seen, only the Assembly majority map preserves the community of interest that links Greenburgh to Westchester as a whole. And only the Assembly majority map offers continuity of representation.

It is my understanding that there is no Constitutional or other compelling reason why Greenburgh's interests need to be cast aside in the redistricting process. I hope very much that you will let the public interest be your guide in this important decision.

Thank you.



Woodhaven Residents' Block Association

Established 1972

84-20 Jamaica Avenue, Woodhaven NY 11421

(718) 296-3735 info@woodhaven-nyc.org

www.woodhaven-nyc.org

March 7, 2012

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Dear Judge Mann,

Thank you for the opportunity to comment on the congressional district lines you have proposed in your capacity as Special Master.

This letter is being submitted by the Woodhaven Residents' Block Association (WRBA). The WRBA, now in its 41st year, works on behalf of the residents of Woodhaven, an approximately 1.7-square-mile neighborhood in Queens. The WRBA serves as an advocate for Woodhaven residents, promotes neighborhood spirit by bringing together residents and local leaders, and seeks to engage all in the betterment of our community.

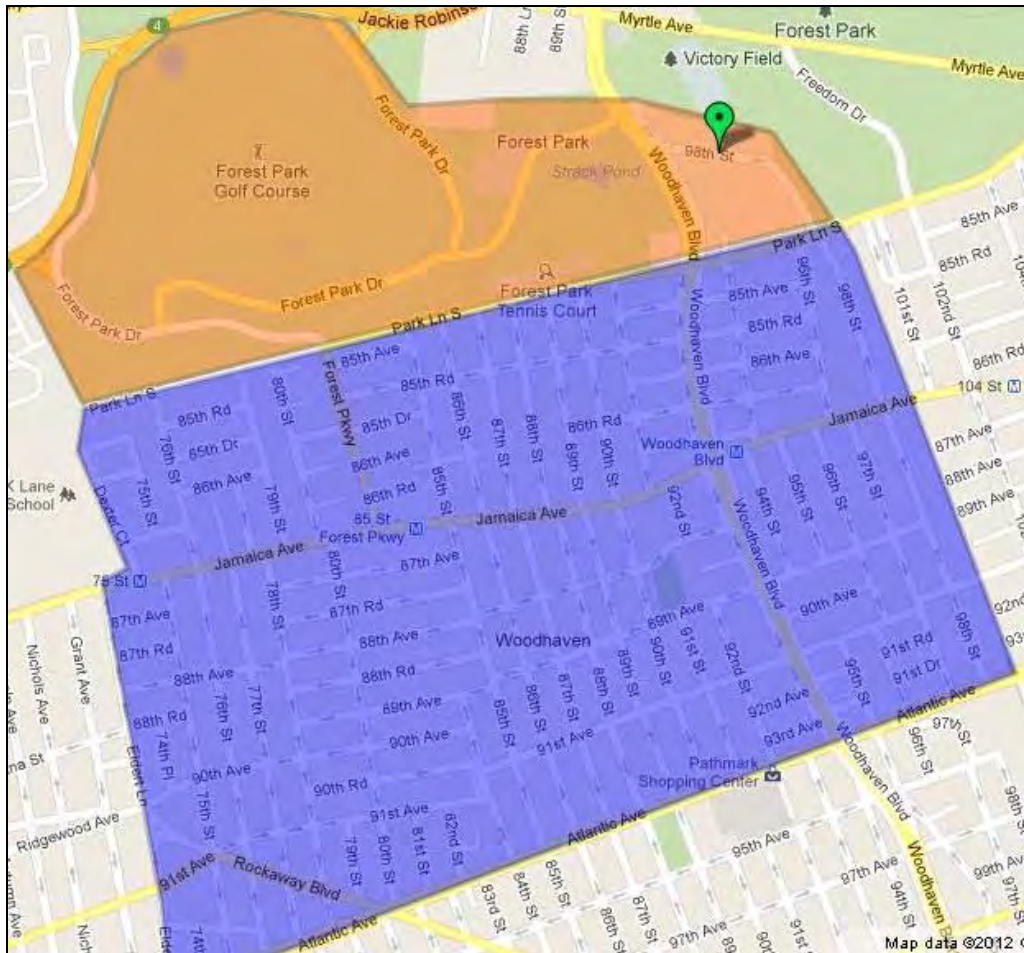
The WRBA strives to be responsive to the residents of Woodhaven. Our efforts take many forms: we are in regular touch with our elected officials at the city, state, and federal levels to emphasize the importance of particular issues; we serve as a conduit with the local police precinct, Community Board, government agencies, and other organizations to help maintain the safety and quality of life in Woodhaven; we establish programs on our own to deal with problems such as the shortage of parking, the proliferation of graffiti, and the growing problem of abandoned houses; and we give residents a chance to speak up and be heard at our monthly town hall meetings.

We would like to focus on your Proposed District 7, which encompasses most of the neighborhood of Woodhaven. We have two principal observations about this proposed district: first, it divides Woodhaven between two congressional representatives; and second, it separates Woodhaven from nearly all of Queens, placing it in a predominantly Brooklyn-based district that includes almost none of the neighborhoods with which Woodhaven has shared a congressional district for decades. Because of these facts, our main piece of feedback and our humble request is for you to redraw the district lines in a way that places the entirety of Woodhaven in a primarily Queens-based district.

I. Keeping Woodhaven Intact

Proposed District 7 places most of Woodhaven within the same congressional district. Unfortunately, however, two parts of Woodhaven would not lie within this district: the Forest Park Co-ops, and Forest Park itself.

The map below shows how Woodhaven would be split. The blue portion of Woodhaven would lie in Proposed District 7, and the orange portion of the neighborhood would be part of Proposed District 6.



The western segment of Forest Park makes up the majority of the orange portion. The Forest Park Co-ops, indicated by the green marker in the northeast quadrant of the map, would also be separated from the rest of Woodhaven.

Forest Park should be in the same district as the rest of Woodhaven. It is difficult to overstate how integral to the neighborhood's identity the park is. Woodhaven simply would not be Woodhaven without Forest Park. Numerous neighborhood events are held in the park. Local elected officials conduct services there. And the park is not without challenges that demand our elected officials' attention.

The WRBA has spent countless hours fighting to reopen the Forest Park Carousel, which is located there. We responded to an uptick in crime in the park by requesting a greater police presence there. The people of Woodhaven are the residents who know Forest Park and are pushing for its well-being. By placing the park in a different congressional district than the many residents who frequent the park and fight on its behalf, this proposal will result in a Member of Congress who is highly unlikely to be aware of the challenges, opportunities, and needs facing Forest Park.

This proposal also separates the Forest Park Co-ops, home to thousands of Woodhaven residents, from the rest of Woodhaven. This is a highly undesirable outcome because many of the issues that affect Woodhaven as a whole (e.g., crime, traffic along Woodhaven Boulevard, and whether to install a greenway or to activate a rail line along long-dormant train tracks in Forest Park) also intimately affect the Forest Park Co-ops.

At the WRBA's most recent Town Hall, on February 18, 2012, a very similar subject arose in discussion. The Forest Park Co-ops are currently represented by a different New York State Senator than the rest of Woodhaven. Everyone agreed that this arrangement is suboptimal. This State Senator is virtually never seen in Woodhaven. Neither she nor any of her representatives has ever shown up for a WRBA Town Hall or any other Woodhaven civic meeting. This is an unsurprising outcome because the Co-ops make up such a small portion of her district. Nonetheless, it severely damages the representation received by these residents. There is no need to make the inhabitants of the Co-ops orphans when it comes to their congressional representation too.

The proposed congressional lines fail to recognize that Woodhaven is a cohesive neighborhood. The WRBA is very proud of its efforts to make Woodhaven a truly unified community—a “haven in the city,” as we call it. As alluded to above, part of having a cohesive community is that common issues affect the whole neighborhood, not just a fraction of it. People from every corner of the neighborhood take the same subway line, shop at the same grocery stores, play in the same parks, attend concerts at the same bandshell (located in Forest Park), face the same parking problems, and attend the same annual street fair. All of Woodhaven is served by the same police precinct and the same Community Board. It only makes sense for all of Woodhaven to be represented by the same Member of Congress, too.

In addition, the proposed congressional lines will make it more difficult for fellow residents to know who's representing them and whom to ask for help. Whenever redistricting occurs, some residents will be shunted into a new district with a new representative. That is confusing enough on its own. But splitting up the neighborhood in this manner will multiply the confusion. It is possible that after the redistricting and upcoming elections, every single Woodhaven resident will be

represented by a Member of Congress who has never represented them before and who, quite possibly, they have never even heard of before.

As a result, it will become much more difficult for residents to know who is representing them in Washington, D.C. The proposed lines also throw up another roadblock to residents who need help with problems and are seeking constituent services—an important function of Members of Congress. This is exactly the opposite of what redistricting should aim to accomplish.

II. Keeping Woodhaven in Queens

Woodhaven is a neighborhood in Queens. Though it abuts Brooklyn to the west, there is no question that Woodhaven is part of Queens and has deep ties to other Queens neighborhoods.

The proposed district lines would place nearly all of Woodhaven in a predominantly Brooklyn-based district. Proposed District 7 spans three boroughs and takes in such neighborhoods as Williamsburg, Bushwick, Red Hook, and Sunset Park, as well as Chinatown and the Lower East Side in Manhattan. Ask any Woodhaven resident what they think of being grouped together with this set of neighborhoods and they would tell you that it makes very little sense, and that it would be far more sensible to group Woodhaven with other Queens neighborhoods.

Proposed District 7 includes almost none of the other neighborhoods with which Woodhaven has shared a congressional district for decades. The proposal places Woodhaven in a different congressional district than most or all of the nearby Queens neighborhoods of Richmond Hill, Glendale, Ozone Park, Middle Village, Kew Gardens, and Howard Beach. The proposed district appears to pay little heed to the neighborhoods with which Woodhaven shares a Community Board, a police precinct, a school district, bus lines, shopping strips, and countless other common elements.

(Stunningly, the proposed maps place most of Woodhaven, Richmond Hill, Glendale, and Ozone Park, respectively, in four separate congressional districts. Anyone who has ever spent any amount of time in these communities understands how closely connected they are and how little sense it makes to split them up four ways.)

It is hard to escape the feeling that Woodhaven is in some sense being singled out. No other Queens neighborhood has such a large proportion of its residents placed in this Brooklyn-based district.¹ And very few Queens neighborhoods are

¹ A significant proportion of Ridgewood and Ozone Park will also be included in proposed District 7, as will smaller fractions of Glendale and Richmond Hill. But in Woodhaven's case alone is the near-entirety of the neighborhood included in this district.

placed nearly *in toto* into any predominantly Brooklyn-based district.² This might be a simple accident of geography, but the drawing of district lines should be more sensitive to the borders of neighborhoods and the reality of the people who live within these districts.

For someone to draw district lines while blinding oneself to political realities is also to perform a disservice to the ordinary residents who will have to live with those lines. There is ample evidence that county lines are important political fault lines as well; political party officials representing a particular county are more likely to be concerned about their own county than about others. This is compounded—as it would be in Proposed District 7—when a district is based mostly in one county and includes relatively little of another county.

This concern for one's own county is not unique to party bosses; it is also true of the Members of Congress themselves. One need look no further than Woodhaven to see this dynamic in action. In the status quo, part of western Woodhaven is represented by a Member of Congress whose district lies almost entirely in Brooklyn. These Woodhaven residents hardly ever see their Congressperson (or surrogates of this Congressperson), who basically never attends any WRBA Town Halls or other local Queens civic meetings. The proposed lines are very likely to turn the fate of western Woodhaven's congressional representation into the fate of *all* of Woodhaven's congressional representation.

Finally, we notice that Proposed District 7—which resembles a crooked boomerang—appears much less compact than many of the other proposed districts, including Proposed Districts 3, 4, 5, and 6. To the extent that compactness should be considered—and it should be, not least because it will bear upon a Member of Congress's ability to visit every part of his or her district regularly—Proposed District 7 seems to be problematically misshapen.

It will be extraordinarily difficult—and unlikely—for a member of Congress from this proposed district to represent Woodhaven well.

III. Conclusion

The WRBA has an extremely modest budget and consists entirely of volunteers. As a result, we simply do not have the resources to retain a lawyer or to spend a large amount of time proposing maps of our own, as many other organizations do. We sincerely hope that our message is not ignored as a result.

What we do have is many decades of experience as residents of Woodhaven and Queens. And this experience makes it overwhelmingly clear that the way

² Howard Beach appears to be encompassed by the Brooklyn-based District 8, and Ozone Park appears to be split between District 7 and District 8.

Woodhaven is included in Proposed District 7 makes little sense and will severely damage our representation in Congress.

The drawing of district lines should not be a mechanical process of number-crunching and ethnic balancing that ignores whether a neighborhood is divided, or whether neighborhoods with common interests or close ties are split up, or whether political realities make it highly unlikely that a community will receive the representation it needs.

We sincerely appreciate your hard work on a tight deadline. We understand that an exercise as complex as drafting district lines will never satisfy everyone. We also recognize that you are bound by laws, precedents, and other imperatives we might not fully comprehend. We humbly request, however, that you revisit the way your proposal treats Woodhaven. If your proposed maps become law, our neighborhood's representation will suffer. Please, redraw the district lines in a way that places the entirety of Woodhaven in a primarily Queens-based district.

Respectfully,

The Woodhaven Residents' Block Association

Edward K. Wendell	President
Janet Chan-Smith	First Vice President
Alexander J. Blenkinsopp	Second Vice President
Roger Hennin	Third Vice President
Arlene Annunziata	Secretary
Vance Barbour	Treasurer
Maria Thomson	Financial Secretary
Martin Colberg	Director
Steve Forte	Director



February 29, 2012

The Honorable Roanne L. Mann
Magistrate Judge
United States District Court
Eastern District of New York
500 Pearl Street
New York, New York 10007

Dear Judge Mann:

I write in regards to Congressional redistricting in New York State, which you are supervising as Special Master. Specifically I am concerned with the 15th Congressional District (15th CD) and its importance to Black communities throughout New York State and across our nation.

The 15th CD was the second district won by an African-American man in the northern states after the Civil War. It was first held by Congressman Adam Clayton Powell, Jr., a man whose efforts led to both the Civil Rights Act and the Voting Rights Act and since 1970, it has been held by Congressman Charles B. Rangel, the dean of New York's Congressional Delegation and the former Chairman of the House Ways and Means Committee. This is an important district for Black New Yorkers, not only because of the history, but because of the voice it provides our people in Washington.

With over 3.3 million Black residents, New York has the largest Black population in the United States. However, only four districts are represented by Black Congress members, one being the 15th CD, a Voting Rights District. To potentially lose a voice for our people would be devastating to our communities and our culture, and would leave Black residents of New York even less represented in a system where we have never been well represented. This is why I am supporting a plan that seeks to tie "Communities of Interest" together and allow our demographic unity to provide our people strength.

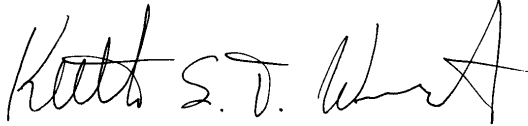
The plan, as has been presented to me and supported by Congressman Charles Rangel and the New York State NAACP (see attachments), would tie Black communities in northern Manhattan, the northern and eastern Bronx and a small part of Queens together within the 15th CD. Additionally, it would remove current parts of the 15th CD for the creation of a new and much needed Latino district, a district put forth and supported by Latino communities in both the Bronx and northern Manhattan. Black communities and Latino communities would be more represented under this plan than ever before, regardless of which Borough they live in. Notwithstanding my charge as County Leader, I believe that uniting "Communities of Interest" is more important than the notion of Borough sovereignty and I hope you share this view, as it is based on demographics and common sense.



Keith L.T. Wright, County Leader

Thank you for your attention to this matter and I look forward to working towards a solution that ensures vociferous and vibrant representation for Black New Yorkers.

Sincerely,



Keith L.T. Wright
Chairman
New York County Democratic Committee



**MANHATTAN
DEMOCRATIC PARTY**

Keith L.T. Wright, County Leader

March 7, 2012

The Honorable Roanne L. Mann
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 12201

Re: Favors v. Cuomo
11. Civ. 5632

Dear Judge Mann:

First, I want to commend this Court for its diligent work in producing a draft plan for 27 Congressional Districts for New York State in short order (while the Legislature continues to ruminate); and for giving parties to *Favors v. Cuomo* and the broader public, the opportunity to offer constructive recommendations for improving upon the Special Master's draft plan.

However, I write today in objection to the Proposed Plan ("Plan") as it has a negative impact on the voting rights of many New Yorkers of color. I stand firmly with the Voting Rights for All Coalition ("VRA") in our collective effort to implore this Court's reconsideration of the Plan. Furthermore, as originally stated in my submission of February 29, 2012, I am extremely concerned that the Plan for the 13th CD ("District") does not adequately protect the communities of interest in Northern Manhattan but erodes the political strength the population is entitled to.

The District as proposed does not do enough to respect its historic nature and impact on national politics nor does it connect the Harlem, Northeast Bronx and Mount Vernon communities of interest. The path to preservation of the very first African American congressional district of the North is quite possible and, notably enables the creation of a new Latino congressional district as well.

These recommendations with regards to 13th CD should be understood within the broader context of the state of African American congressional representation in the State of New York. New York has elected four African American congressional representatives since the 1982 congressional redistricting round (*Flateau v. Anderson* with Special Master Robert Patterson), under circumstances similar to today: one from Harlem and Northern Manhattan in 1944 (Adam Clayton Powell, Jr. then Charles B. Rangel); one in 1968 (Chisholm), two from Central Brooklyn in 1982; and one from Queens in 1986.

According to the 2010 Census, New York State has grown to be the home of 3.3 million African Americans, the largest African American population of any state in America. Thus based on African American population growth and size, there is no rationale for the retrogression of New York's African American congressional district representation from 4 down to 3 districts, as is the case under the Special Master's current plan. The Plan only creates three CDs thus far with 50% African American VAP, greatly diminishing African American voters' opportunity to elect candidates of their choice.



**MANHATTAN
DEMOCRATIC PARTY**

Keith L.T. Wright, County Leader

The pathway to preserve the core district of Harlem-North Manhattan is as follows:

Extract Washington Heights, 140,000, 75% Hispanic/Dominican, to be coupled with Special Master CD 14. (see Dominican American National Roundtable (DANR) map). North Manhattan is then coupled with North Bronx (Williamsbridge and Coop City); and the City of Mount Vernon, right over the Bronx County line. This revised District seamlessly connects these African American and Caribbean American social, cultural, linguistic, religious communities of interest; and creates a revised District that is more than 50 percent African American voting age population (BVAP).

The NYS NAACP President Hazel Dukes presented such a framework to LATFOR; along with three other maps to preserve African American congressional representation in Brooklyn and Queens. These maps undoubtedly preserve four African American congressional representatives for New York and uphold the spirit of the Voting Rights Act.

This strongly recommended configuration for the District reflects the current realities of changing demographics and migrating African American populations in New York City and is consistent with this Courts modality for creating CD 7, which is a tri-county district combining heavy Hispanic and Asian populations in Brooklyn, Manhattan and Queens, which preserves a plurality (41% Hispanic VAP) Latino congressional district that has elected Hon. Nydia Velazquez for the past 20 years. In addition the Special Master's CD 15 (64% Hispanic VAP) preserves a second Latino CD wholly in the Bronx, represented by Hon. Jose Serrano for the past 22 years. The same consideration must be given for District represented by Hon. Charles Rangel for the past 40 years.

The proposals of all members of the VRA are consistent in one theme: this Court must not endorse the Plan as contemplated because it would have a disparate impact on millions of New Yorkers of color who must be protected under the Voting Rights Act of 1965. Thank you for your work thus far and I am available at your convenience to discuss the any of the above.

Sincerely,

Keith L. T. Wright
County Leader
New York County Democratic Committee

Rationale for Proposed 15th CD (Rangel) – 2012 Redistricting

John L. Flateau, PhD
johnflateau@gmail.com 347-423-6794

Background

The northern Manhattan based 15th Congressional District is the second oldest northern Black congressional district in the United States. The Deep South, where 90 percent of the Black population resided in the post Civil War era, elected several Black Congress members during the Reconstruction era. The first northern Black Congressman was elected from Chicago in the 1920s, Oscar DePriest, followed by Arthur Mitchell and William Dawson. The second northern Black Congressional district was based in Harlem and northern Manhattan, New York, and elected Adam Clayton Powell, Jr. in 1944, followed by Charles B. Rangel in 1970. Both Powell and Rangel achieved historic, powerful congressional roles benefiting Black Americans and indeed all Americans. Powell as Chair of the House Education and Labor Committee was a prolific legislator playing a seminal role in ushering in civil rights, and War On Poverty legislation of the 1960s. Rangel has played a key legislative role as Chairman of the powerful, tax writing House Ways and Means Committee; and today, he is the senior member and Chair of the New York Congressional delegation. Thus for decades, the 15th CD has been a national, historic congressional district for Black New Yorkers and Black Americans.

According to the 2010 Census, New York has the largest Black population of any state in America: this population has grown to 3.3 million Black New Yorkers, and has been represented by four Black members of Congress for the past three decades (Manhattan-1, Brooklyn-2, Queens-1). As expected, via Census 2010, there have been demographic shifts in the location and composition of New York's Black population and other populations, and there is a robust overall Black population base of 3.3 million, more than enough to sustain the continued representation of four Black congressional districts in New York, including the 15th CD.

It should also be noted that New York County, which is also the Borough Of Manhattan, is one of three counties in New York State, covered by the Section 5 preclearance provisions of the US Voting Rights Act; and the 15th CD is a voting rights district.

Boundary Descriptions, Proposed 15th CD – Contiguous, Compact, et.al.

The proposed 15th CD is highly compact, taking in all of Manhattan north of 97th St. from East River to Hudson River, with the exception of Washington Heights. Within its current boundaries, the 15th CD is some 80,000 short of the current equal population requirement of 717,707. The additional subtraction of Washington Heights with approximately 139,000 persons makes it necessary for the 15th CD to pick up major population and

geography. It cannot go further south in Manhattan without causing major disruptions. South of 97th St. on the East Side is the current 14th CD (Maloney); and on the West Side, is the 8th CD (Nadler). Thus the only directions for the 15th CD to go are: north and east, into the Bronx; and east into Queens. (CD 15 is bordered by the Hudson River on its west side.)

Going east, the 15th CD picks up Roosevelt Island (13,000) and three public housing developments very close to the East River waterfront in Queens: Queens Bridge Houses, Ravenswood Houses and Astoria Houses (Queens total, 20,000). The 15th CD already has one of the largest concentrations of public housing in the City, State and nation, and these three additions blend well with the public housing community of interest. This adds about 33,000 persons to the 15th CD. The balance of necessary population to reach 717,707 is added by going north and east, into the Bronx.

The 15th CD goes from the northern tip of Manhattan, the Marble Hill neighborhood, takes a narrow corridor eastward, hugging the southern border of Van Cortland Park, and adds the North Bronx areas of Williamsbridge and other areas between East Gunhill Road on the south, and the Bronx County line on the north; as well as Coop City, in order for the 15th CD to reach the population requirement of 717,707. The proposed 15th CD takes this particular route, in order to take the most unobtrusive pathway, leaving maximum maneuverability and unobstructed geography for the Bronx's nearly 750,000 Hispanic population including its heavily Dominican West Bronx, in order to constitute the basis for two Hispanic congressional districts anchored in the Voting Rights County of the Bronx, with 1.4 million persons, including the current 16th CD represented by Hon. Jose Serrano.

This 15th CD pathway to the Bronx also provides a geographic connector for two Black socio-cultural communities of interest, which are comprised of approximately 149,000 Blacks in North Manhattan and their socio-cultural siblings, who are 129,000 Blacks in the North Bronx.

Richard Hamlin

6198 Diffin Road

Cicero, NY 13039

Dear Judge Mann,

I am writing to ask you to please not accept the proposed redistricting of the Congressional seat here in Central NY. In particular, the combining of Syracuse and Onondaga County with Tompkins County.

The two areas of the state are distinctly different, and Tompkins County really should be linked with the Southern tier areas such as Corning, Binghamton, etc. and Syracuse should be linked with Oswego, Jefferson, Oneida and Madison counties.

I feel the reason for the proposed Onondaga and Tompkins County to be combined into one Congressional seat is purely proposed as gerrymandering scheme only meant as a control mechanism to for the political party in power right now.

I am not a member of either the Democratic or Republican Party, I am a lifelong Independent. My reason for this letter is to just see a balance of power.

Thank you for your consideration.

Richard Hamlin

March 2, 2012

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court – Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Redistricting NYS 25th Congressional District

Dear Judge Mann:

We believe that the new district replacing the existing 25th should consist of the following counties in their entirety.

<u>County</u>	<u>Population</u>
Onondaga	476,026
Madison	73,442
Cayuga	80,026
Cortland	<u>101,564</u>
Per US Census Data	722,058

Advantages include:

Meets required population goals

It is easier for congressional representative to work with whole counties instead of fragmented counties.

These counties form a long existing metro area with common economic interests.

Thank you for your consideration.

Harold J. Smith
7681 Totman Road
Syracuse, NY 13212

Richard A Palmer
609 Mertens Ave
Syracuse, NY 13203

Dear: Hon. Carol Bagley

I am a constituent of the 25 Congressional District and I realize that redistricting must be done. I feel our district should be expanded east or west and not south. But I feel that as long as the plan is fair for all, Congressman Buerkle will meet the challenge with great success.

Thank You

Richard A Palmer

132 Old Post Road North
Croton on Hudson, NY 10520
914-960-5700

Hon. Roanne L. Mann
United States Magistrate
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Favors, et al v Cuomo et al, 1:11-cv-5632

Dear Magistrate Mann:

The undersigned are several elected officials, business leaders, and community leaders who live and work in northern Westchester County. This is a commentary on the congressional district lines which have been submitted to the Special Master in the matter of Favor, et al. v. Cuomo, et al.

The current configuration of the 19th Congressional District, particularly, northern Westchester, Putnam, and Orange Counties, has been in place, more or less, as is for at least thirty years. The current 19th Congressional District represents a district known as the Lower Hudson Valley. The new district lines proposed by the majority in the Senate (the Senate lines) and the new district lines proposed by the majority in the Assembly (the Assembly lines), would effectively eviscerate the current 19th Congressional District. Geographically, the district of the Lower Hudson Valley would be split in both the Senate and Assembly submissions into four different congressional districts. The Lower Hudson Valley is one of the fastest growing areas in New York. In fact, the currently constituted district only requires the addition of about 25,000 people to reach the proper size. The current district needs only to be “tweaked.”

In 2002, the court (again then, as now, with a Special Master having been assigned to draw the congressional district lines) adopted a plan that specifically indicated respect for “the cores of current districts and the communities of interest that have formed around them”. [May 23, 2002 at pp. 10-11, fn. 12.]

Keeping all of the northern Westchester communities together in a single district, together with Putnam County and Orange County, is important. Northern Westchester and Putnam are the Croton Watershed area for metropolitan New York. It is in the interest of the rest of the state that this area have a united presence in its federal representation. The security and preservation of this water resource is a large contributor to the economy and the ecology of this district. It should not be split up and have the significance of this fact diluted.

Similarly, the entire district is served, and served well, by the MetroNorth railway system. The entire current district relies on three of the principal lines, the Hudson Line, which runs from Grand Central to the Croton-Harmon yard and all the way up to Poughkeepsie, the Harlem Line which runs along the eastern boundary of the state and the district to the northern limit of the

current 19th Congressional District, and the Port Jervis Line, just back in service after devastating damage caused by Hurricane Irene, is critical to the economy of Orange County. MetroNorth is perhaps the most important resource for the success and vitality of the economy of the district. It also is a uniquely unifying factor for the district.

The Senate Lines cut the northern municipalities of Westchester in half. Peekskill, Cortlandt, Croton, Yorktown, Pound Ridge, and Mt. Kisco would be lumped into a district with Yonkers, Mt. Pleasant, New Rochelle and Rye, communities which are very different from each other. The southern part of Westchester is much more urban and densely populated, and its culture and “communities of interest” are very different than those of the northern, more rural or suburban bedroom community areas.

The local municipalities of northern Westchester County, in particular, have a history of cooperation in their pursuit of federal initiatives that bears witness to the core culture that exists here, and should not be divided. One example is the northern Westchester Energy Action Consortium (www.nweac.org), a group who’s mission statement reads:

“The Northern Westchester Energy Action Consortium (NWEAC) consists of 14 municipalities in Westchester County, New York. Consortium members collaborate to reduce our reliance on fossil fuels, save money for our residents and businesses, increase energy efficiency in our communities, enable renewable energy generation, increase economic activity, and align our local efforts with county, state, and federal initiatives.”

All the towns and cities in northern Westchester have signed on as member municipalities of NWEAC, working in conjunction with each other to address federal initiatives. This is but one example of efforts underway in the common municipal culture of northern Westchester that should not be divided.

The Assembly Lines have would put Orange County in a district which would extend from Tuxedo Park to the south and meander around all the way to Hudson Falls in Washington County. This district, their District 19, would be made up of the New York City bedroom community of Orange County, the Catskill Mountains, the eastern and northern suburbs of Albany, as well as the rural agricultural areas of Rensselaer and Washington counties. This plan completely ignores and splits the core community that exists in the Lower Hudson Valley district, as it does the other regions in this district. Further, the Assembly Lines would cut the town of Yorktown in northern Westchester in half, removing some of it from the district it has been connected to for decades.

We do not propose any particular district boundaries. However, since the current 19th Congressional District would require only a small increase in territory to achieve the required population, we strongly urge that changes to the district should be kept to a minimum. Further, it is our belief that the Lower Hudson Valley, made up of northern Westchester County, Putnam County, and Orange County constitute a “community of interest” and share a similar culture. We strongly recommend that the city of Peekskill and the eight towns in northern Westchester

currently in NY-19 should be preserved in a single district. Similarly, the towns in southern Orange County belong in a district tightly connected to the Lower Hudson Valley and not to the Albany or Catskill Mountains regions.

Respectfully submitted,

Kathleen Talbot
Councilwoman
City of Peekskill

Marina Ciotti
Chairwoman
Peekskill Democratic Committee

Seth Freach
Chairman
Town of Cortlandt Democratic Committee

Leo Wiegman
Mayor
Village of Croton-on-Hudson

Nance Shatzkin
President
Croton Housing Network

Mary Breining
Receiver of Taxes
Town of Cortlandt

Francis X. Farrell
Councilman
Town of Cortlandt

Don Peters
Former Supervisor
Town of Yorktown

John McBride
Chairman
Croton-on-Hudson Democratic Committee



Favors, et al. v. Cuomo, et al., 11-cv-5632(DLI)(RR)(GEL)

United States District Court for the Eastern District of New York

Public Comment of
Rachana Shah, Taking Our Seat

March 5, 2012

Good afternoon, my name is Rachana Shah and I am with Taking Our Seat, a Queens County based non-partisan, not-for-profit civic organization. Taking Our Seat was founded to empower South Asian-Americans (SAA) in the electoral process by eliminating South Asian voter dilution through the redistricting process. Taking Our Seat was formed because the SAA community's growth in population and economic power over the past decade has not translated to electoral influence. SAA voters do not have viable choices at the polls and for SAA candidates seeking elected office often face barriers that others who run for office do not face.

Taking Our Seat is also a charter member of the Asian American Community Coalition on Redistricting and Democracy (ACCORD) a collaboration of pan-Asian civic organizations.

Thank you for giving me the opportunity to present before you today.

The South Asian American Community

Taking Our Seat defines a South Asian American as anyone who can trace their ancestry back to the countries of South Asia or to a South Asian diaspora, for example, the Caribbean or Africa. Countries include Bhutan, Bangladesh, India, Nepal, Pakistan, Sri Lanka, the Maldives, Trinidad/Tobago, Guyana and Surinam among others.

There is not a single SAA representing New York in Congress, in either house of the State legislature or in the New York City Council. These facts do not reflect the strength of the number of SAAs from the 2010 Census data.

According to the 2010 Census, there are 351,000 SAAs in New York City. This represents an increase of 61% over the past decade. Of these, nearly 60% reside in Queens County. The largest communities of SAAs are found in the following cluster of neighborhoods:



- Richmond Hill and South Ozone Park
- Briarwood and Jamaica Hills
- Jackson Heights and Elmhurst
- Bellerose, Glenn Oaks, Floral Park and Queens Village

Current South Asian American Voter Dilution

The district lines drawn as a result of the redistricting process following the 2000 Census disenfranchised SAA communities. Due to these lines, SAA voters do not have an equal opportunity to elect a candidate of their choice. For SAA candidates, a fractured base of SAA voters spread over many districts has cost SAA candidates endorsements, fundraising opportunities and has forced SAA candidates to reach far into non-neighboring communities at great expense and with little success. With the community spread over many districts the only way for meaningful political participation for SAA voters has been through political contributions where much of the contributions have left the community.

In those Queens neighborhoods where SAAs are most concentrated, existing electoral district lines serve to dilute SAA voter strength. Below is the current political representation of the four highest concentration SAA cluster of neighborhoods.

Richmond Hill Cluster:

New York State Senate Districts	10 & 15
New York State Assembly Districts	23, 25, 27, 32, 31 & 38
New York City Council Districts	32, 30, 28 & 29
U.S. Congressional Districts	6 & 9

Briarwood Cluster:

New York State Senate Districts	10, 11 & 14
New York State Assembly Districts	24, 25, 27, 29 & 32
New York City Council Districts	23, 24 & 27
U.S. Congressional Districts	5, 6 & 9

Bellerose Cluster:

New York State Senate Districts	11 & 14
New York State Assembly Districts	24, 26 & 33
New York City Council District	23
U.S. Congressional Districts	5 & 6



Jackson Heights Cluster:

New York State Senate Districts	12, 13, 15 & 16
New York State Assembly Districts	28, 34, 35 & 36
New York City Council Districts	24, 25, 26 & 29
U.S. Congressional Districts	5,7 & 9

Redistricting Law and South Asian Americans¹

Taking Our Seat’s report, *Opening the Golden Door, Part 1*, published in September of 2010, outlined how SAA voter dilution impacted the 2010 election for New York City Council in the SAA dense community of Richmond Hill and South Ozone Park. SAAs across New York City are the victims of ‘cracking,’ or the spreading of the SAA community over a larger number of districts, making it difficult to elect a candidate from the SAA community in to office. This phenomenon is illegal under Section 2 of the Voting Rights Act since SAA voters don’t have an equal opportunity to elect a candidate of the community’s choice.

The case law offers guidance but not a clear avenue to stop the dilution of SAA votes; this coupled with an analysis of the 2010 Census data, below, leads to the ‘Mosaic District’ solution, discussed below.

The United States Supreme Court permits race to be used, among other factors, in drawing political district lines but with limitations. The limited use of race coupled with traditional principles of redistricting which require that districts be compact and contiguous; respect political subdivisions; preserve communities of interest; and meet political goals provide an untested remedy to stop SAA voter dilution.

An important guidepost for the SAA community is the success of the East Asian American community in drawing the current lines of the 12 Congressional District of New York. A federal court in *Diaz v. Silver*² agreed that East Asian Americans in Manhattan’s Chinatown and Brooklyn’s Sunset Park neighborhoods constituted a "community of interest" and as such should be kept together within a single Congressional district. From *Diaz*, successful dilution claims could be made if communities shared a common cultural background, economic status, community services and transportation, among other characteristics; those communities could be deemed a “community of interest” and worthy of being kept together in the redistricting process. The resulting Congressional district, and equally important, the domino effect upon the drawing of East Asian opportunity districts in lower Manhattan and in Flushing, Queens at

¹ Taking Our Seat’s analysis is built on the scholarship of the Brennan Center for Justice, A Citizen’s Guide to Redistricting; The Asian American Legal Defense and Education Fund (AALDEF); and NAACP.
²978 F. Supp. 96 (E.D.N.Y.) (per curiam), aff’d, 522 U.S. 801 (1997)



the state and local level for East Asians foreshadow a remedy for SAA voters when a “community of interest” analysis is performed.

Beyond Diaz though, the road to remedy SAA voter dilution is less clear and goes through a number of cases. Diaz (1997) itself followed the United States Supreme Court ruling in *Thornburg v. Gingles*³ (1986) which has since been modified by *Bartlett v. Strickland*⁴ in 2009. Bartlett makes the Gingles tests that lead to Diaz more stringent by adding a number of preconditions. Bartlett’s most burdensome requirement is that the racial minority population be a majority (more than 50%) of a district.

According to the 2010 Census the SAA population of New York City is 351,000 and the new apportionment numbers will mean that each Congressional seat will represent 655,000 people. Since SAAs would be the majority (more than 50%) in a New York City Congressional district only if every single SAA is drawn into one district, the Bartlett preconditions would not be satisfied in New York City. Fairness for non-SAA also prevents drawing such a district. Therefore, the SAA community, acting alone, likely cannot make a successful dilution claim through Section 2 although the evidence of dilution is obvious: currently, there aren’t any SAAs in Congress from New York nor are there any SAA members of the State Senate, State Assembly or New York City Council.

Instead, Taking Our Seat explores a “multi-race-based” analysis where race is not the only measure of district - nor is race ignored; race is used to identify who else is living among SAAs to identify multi-ethnic neighborhoods and multi-ethnic communities of interest.

Census 2010 and South Asian Americans

Since race-based solutions to SAA voter dilution is not easily available, Taking Our Seat proposes a neighborhood-based, multi-racial redistricting plan, which we label ‘Mosaic Districts,’ which account for the needs of the SAA community along with those who live near or among SAA communities.

South Asian Americans and Their Neighbors

The 2010 Census race-specific data for New York reveals some notable observations about where SAA live in New York City:

³ 478 U.S. 30 (1986)

⁴ 556 U.S. 1 (2009)



- There are 351,000 SAA in New York City - an increase from the 2000 Census count of 216,000. Of the 351,000 SAA, 58% or 204,000 live in Queens County.
- In New York City, SAA are the majority race in only 5 of the top 100 SAA concentrated census tracts; and 4 of those 5 census tracts are multi-cultural where at least three of the four other races (White, Black, Latino or non-SAA Asians) are represented in double digit percentages.

We can conclude that SAA live in multi-cultural census tracts and neighborhoods where a community of interest includes multiple races.

Since the top 10 SAA concentrated census tracts are all in Queens County and 78 of the top 100 tracts are in Queens County, the analysis turns to Queens County.

- In Queens County, SAA are the majority in only one of the top 10 SAA census tracts. In 9 of those 10 census tracts at least 3 of the 4 other races (White, Black, Latino and non-SAA-Asians) are represented in double-digit percentages.
- In Queens County's top 100 concentrated SAA census tracts, SAA tend to live in proximity to other *minorities* in the following prevalence: 56% Latinos, 28% Black and 16% Non-South-Asian Asians. And only 7% of those SAA census tracts have a White majority.

This data requires us to acknowledge that in New York City and especially in Queens County, the SAA community lives in close proximity to the other races and that redistricting that addresses SAA voter dilution must account for the other members of the community as well.

The Solution: The Mosaic District

In the drawing of Congressional district and in state and city legislative lines, Taking Our Seat proposes keeping South Asian American (SAA) neighborhoods whole and intact within larger multi-cultural electoral districts. This approach embraces the 2010 Census race specific data for New York which reveals that SAAs live in neighborhoods where, although SAAs have a significant presence, those neighborhoods are primarily multi-cultural, with at least two other races in significant numbers. These Mosaic Districts will address the electoral needs of everyone in the neighborhood while acknowledging the current dilution of SAA votes within the overall electoral process.



Methodology

Taking Our Seat identified the total number of census tracts in New York City where South Asian Americans constitute at least 15% of the population. The full racial characteristics of these census tracts were identified to determine “Melting Pot” census tracts. Melting Pot census tracts are those census tracts that have at least 15% SAAs and yet no single other race exceeds 40% of the total. These Melting Pot census tracts were then marked according to SAA density, creating two categories of Melting Pot census tracts, see attached, Map 1, where SAAs are between 30% and 40% (red labeled census tracts on the map) of the “Melting Pot” census tract and one category where SAAs comprise 15 to 29.9% of the population (pink labeled census tracts on the map).

Taking Our Seat then labeled the racial composition of those census tracts where SAAs are at least 15% and where one race is 40% or more (not-quite-Melting Pot census tracts). These census tracts are labeled to indicate the predominant race in those tracts: Blue (White), Green (Hispanic), Black (Black) and Purple (Asian).

Melting Pot census tracts and not-quite-Melting Pot census tracts were then combined based on existing neighborhood boundaries. The result is the identification of four clusters of neighborhoods that will serve as the basis of the remedy for SAA voter dilution.

Taking Our Seat notes that the Jackson Heights and Elmhurst-based cluster of census tracts, below, does not provide an elegant fit to the neighborhood analysis but given the rate of multi-cultural and SAA growth in the neighborhoods of Woodside and Rego Park any redistricting plan should account for this growth and keep these neighborhoods together in any proposed political district.

Finally, below, these clusters of neighborhoods were then scrutinized under traditional redistricting principles as well as “community of interest” analysis to confirm that these neighborhood pairings would appropriately withstand scrutiny when employed to stop SAA voter dilution.

Emerging Clusters

The reason the redistricting process from the 2000 Census diluted the SAA vote was the inability of the process to account for the growth of the SAA community in those census tracts where SAA were already represented in significant numbers. To ensure the same does not



happen in 2010, Taking Our Seat identifies three other clusters which should be kept whole in the process.

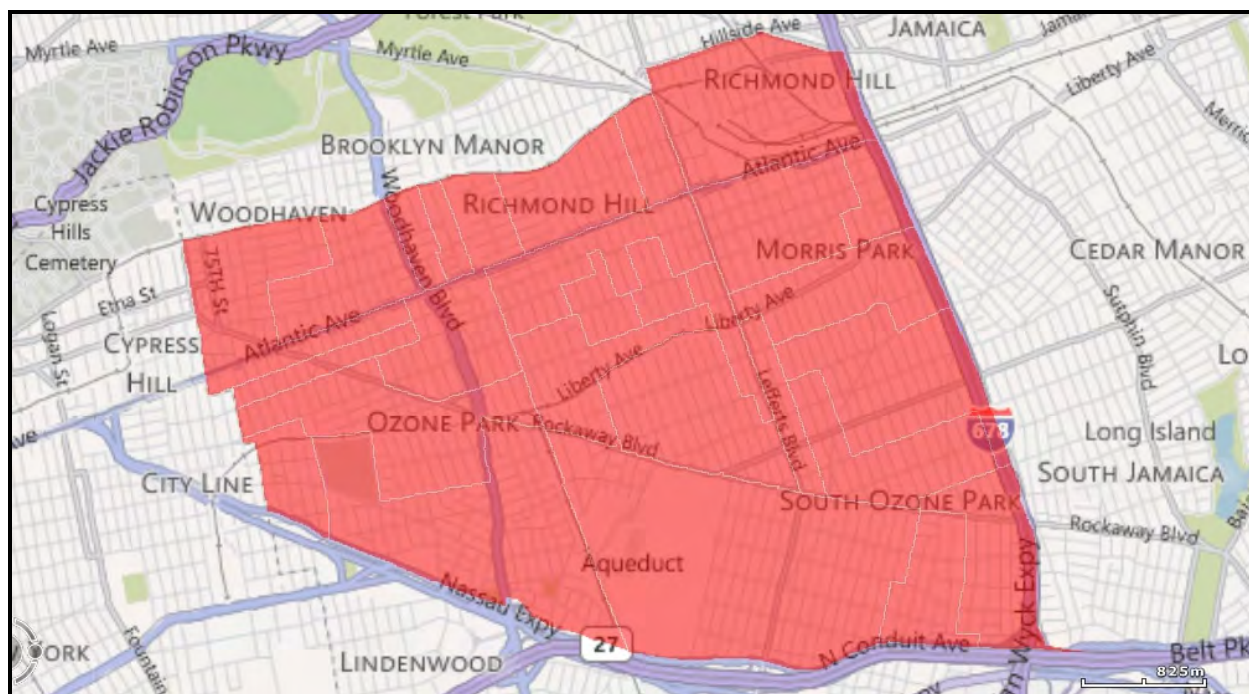
Emerging Cluster One: Long Island City-Astoria-Sunnyside, Queens. This emerging cluster is home to Bangladeshi-Americans. The following census tracts should be kept together in the current redistricting process: 33, 51, 79, 99, 157, 169, 171, 179, 187 and 189.

Emerging Cluster Two: Borough Park-Kensington, Brooklyn. This emerging cluster is home to Pakistani-Americans. The following census tracts should be kept together in the current redistricting process: 228, 456, 460, 482, 486, 488, 490, 492, 496, 498, 520, 526, 528, 534 and 1522.

Emerging Cluster Three: East New York-City Line, Brooklyn. This emerging cluster is home to Bangladeshi-Americans. The following census tracts, 1188, 1190, 1196, 1200, should be kept together in the current redistricting process **or ideally, combined with the adjoining Richmond Hills, Queens cluster proposed below.**

Mosaic Districts

Richmond Hill, Ozone Park, South Ozone Park Community of Interest





Boundaries: North: Jamaica Avenue to Hillside Avenue
 East: Van Wyck Expressway
 South: Belt Parkway
 West: Brooklyn-Queens County Line

Cluster Profile: The SAAs in this cluster are primarily Asian-Indian and Indo-Caribbean.

Total Population	192,000
White	11.9%
Black	15.3%
Hispanic	33.8%
Asian	23.6%
Other	14.5%

Compact: Yes, approximately 6 square miles; smooth boundary; rectangular in shape.

Contiguous: Yes.

Community of Interest:

- 1) *Political Subdivisions:* Queens Community Boards 9 and 10.
- 2) *Local High Schools:*

Richmond Hill High School	Data for 2010-2011 School Year
Asian	34.1%
Black	16.0%
Hispanic	47.1%
White	2.4%

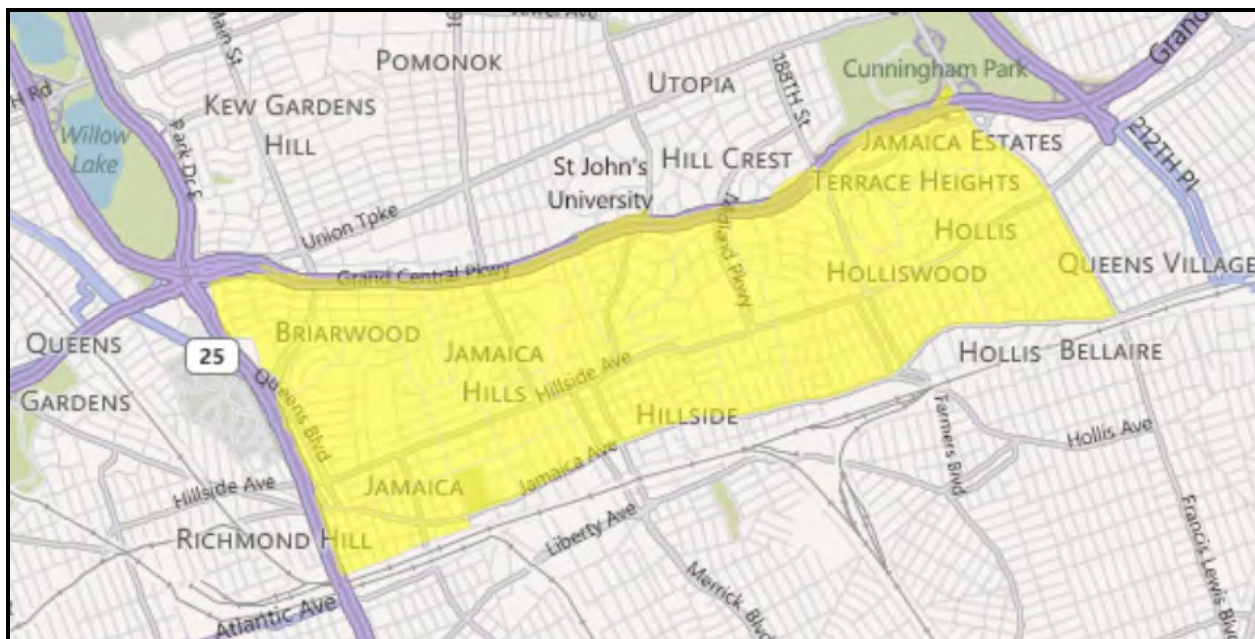
John Adams High School	Data for 2010-2011 School Year
Asian	28.2%
Black	29.3%
Hispanic	36.6%
White	4.4%

- 3) *Common Transportation Characteristics:*
 - a. Subway: J,Z line and A line;
 - b. Buses: Q7, Q8, Q10, Q11, Q21, Q24, Q37, Q41, Q53, Q56, Q110, QM15, QM 18, BM5.
 - c. Main Thoroughfares: Atlantic Avenue, Jamaica Avenue, Liberty Avenue, Woodhaven Boulevard.
 - d. Average Commute Time: 45 minutes⁵

⁵ 2000 Census Data for Richmond Hill; information for other neighborhoods in this cluster not available.



Briarwood, Jamaica Hills, Jamaica Estates Community of Interest



Boundaries: North: Grand Central Parkway
East: Francis Lewis Boulevard
South: Jamaica Avenue & Long Island Railroad
West: Van Wyck Expressway

Cluster Profile: The SAAs in this cluster are primarily are Asian-Indian, Bangladeshi-American and Indo-Caribbean.

Total Population	107,000
White	13.3%
Black	18.8%
Hispanic	28.1%
Asian	30.9%
Other	8.4%

Compact: Yes; approximately 3 square miles; smooth boundary; rectangular in shape.

Contiguous: Yes.



Community of Interest:

- 1) *Political Subdivisions:* Queens Community Boards 8 and 12.
- 2) *Local High Schools:*

Hillcrest High School	Data for 2010-2011 School Year
Asian	34.1%
Black	40.1%
Hispanic	22.3%
White	2.6%

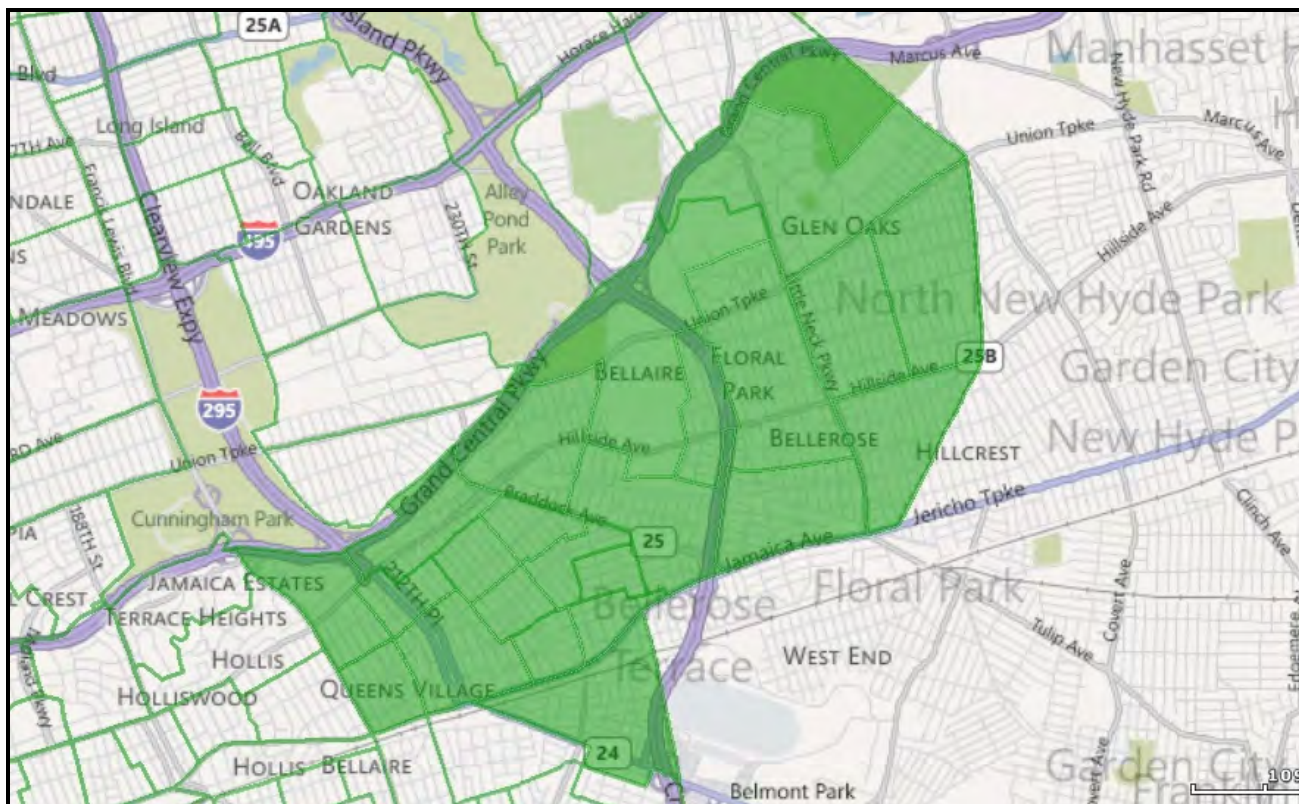
Jamaica High School	Data for 2010-2011 School Year
Asian	29.6%
Black	48.6%
Hispanic	20.7%
White	0.8%

- 3) *Common Transportation Characteristics:*
 - a. Subway: E and F Train
 - b. Buses: Q20a, Q20b, Q25, Q30, Q31, Q34, Q44, Q65. This cluster abuts the Jamaica-Archer Avenue Transportation Hub where a majority of Queens bus routes begin/terminate.
 - c. Main Thoroughfares: Grand Central Parkway, Hillside Avenue, Jamaica Avenue, Parsons Boulevard, Sutphin Boulevard.

-more-



Bellrose, Queens Village, Floral Park, Glen Oaks



Boundaries: North: Grand Central Parkway
East: Queens-Nassau County Line
South: Jamaica Avenue – Hempstead Avenue
West: Francis Lewis Boulevard

The Cluster Profile: The SAAs in this cluster are primarily Asian-Indian.

Total Population	79,000
White	27.5%
Black	14.5%
Hispanic	16.9%
Asian	32.8%
Other	7.9%

Compact: Yes, approximately 5 square miles; smooth boundary; trapezoidal in shape.

Contiguous: Yes.



Community of Interest:

- 1) *Political Subdivisions:* Queens Community Board 13.
- 2) *Local High Schools*

Martin Van Buren High School	Data for 2010-2011 School Year
Asian	22.7%
Black	59.2%
Hispanic	14.9%
White	2.4%

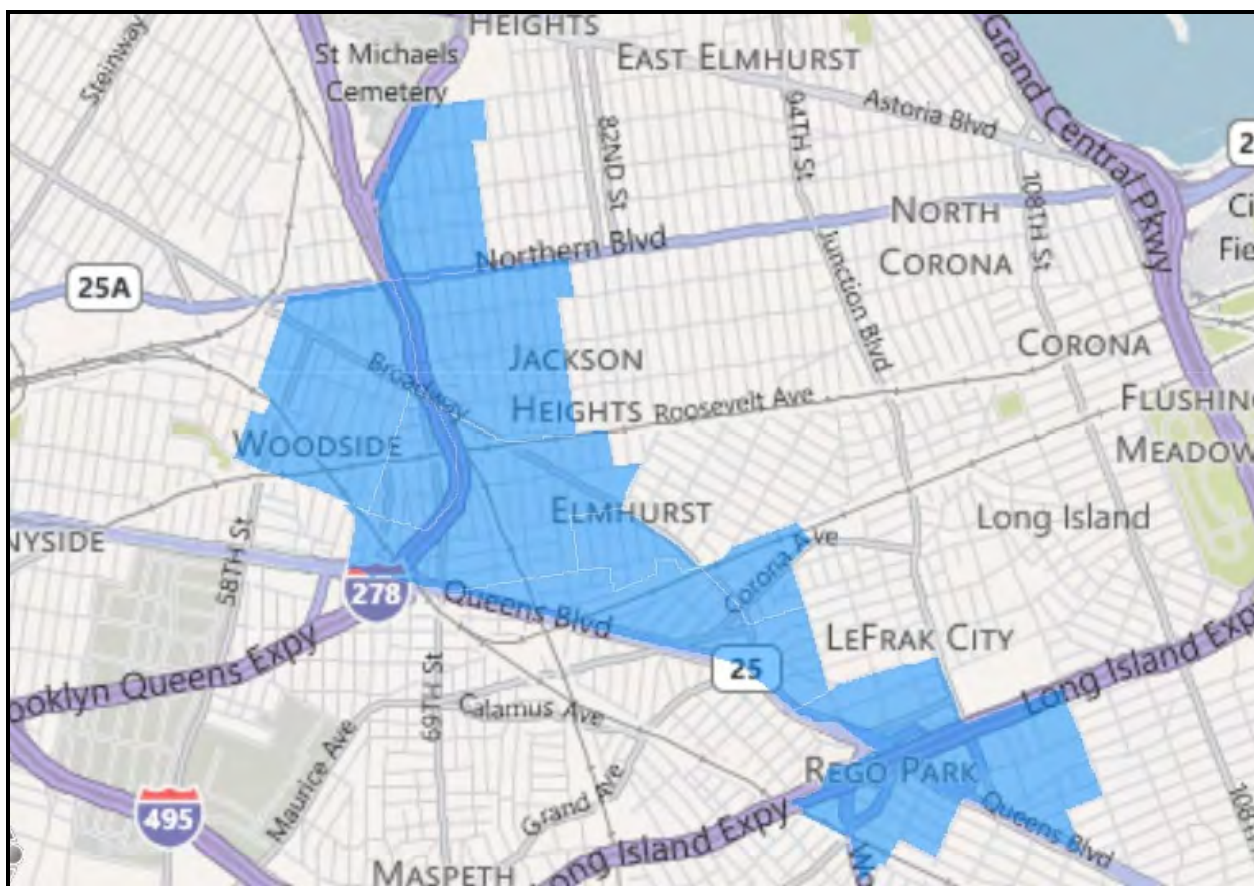
Queens High School of Teaching	Data for 2010-2011 School Year
Asian	23.7%
Black	47.1%
Hispanic	15.7%
White	12.8%

- 3) *Common Transportation Characteristics:*
 - a. Subway: None, bus routes connect commuters to E and F trains or Long Island Rail Road Queens Village Station.
 - b. Buses: Q1, Q27, Q43, Q46, Q76, Q88, X86, QM6, QM5, QM8, N1, N6, N24
 - c. Main Thoroughfares: Grand Central Parkway, Hillside Avenue, Jamaica Avenue, Francis Lewis Boulevard, Braddock Avenue, Springfield Boulevard.

-more-



Jackson Heights, Elmhurst, Woodside and Rego Park



Boundaries: North: Irregular
East: Irregular
South: Primarily Queens Boulevard
West: Irregular

Since the boundaries are irregular, this cluster can be identified by the following census tracts: 247, 257, 259, 261, 263, 265, 267, 289, 287, 291, 293, 309.02, 483, 481, 471, 473, 485, 687, 683, 717.



The Cluster Profile: The SAAs in this cluster are primarily Asian-Indian and Bangladeshi-American. There is an equally large East Asian population as well.

Total Population	81,500
White	15.7%
Black	1.4%
Hispanic	29.7%
Asian	50.3%
Other	2.8%

Compact: Yes, approximately 2 square miles; jagged boundaries; irregular in shape.

Contiguous: Yes.

Community of Interest

1) *Political Subdivisions:* Queens Community Boards 2, 3, 4 and 6.

2) *Local High Schools*

Newtown High School	Data for 2010-2011 School Year
Asian	23.9%
Black	9.1%
Hispanic	61.4%
White	5.3%

High School for Arts and Business	Data for 2010-2011 School Year
Asian	9.3%
Black	8.3%
Hispanic	79.1%
White	2.9%

3) *Transportation:*

- a. Subway: 7, E, F, M, R.
- b. Buses: Q29, Q32, Q47, Q49, Q53, QM2, QM2a, QM3.
- c. Main Thoroughfares: Queens Boulevard, Roosevelt Avenue, Broadway, Northern Boulevard.



Community of Interests and Recommended Political Districts

With the clusters in place, Taking Our Seat advocates for the following congressional district lines:

Ideally all four clusters in their entirety would be kept together in one Congressional district. These clusters could be the anchor of one multi-cultural district within Queens County. The Jackson Heights cluster would serve as the northern anchor, connected to the Richmond Hill cluster via the neighborhoods that border Queens Boulevard, thereby gaining the required number of residents to meet apportionment requirements. The Briarwood cluster and the Bellerose cluster would connect the other two clusters at the intersection of Hillside Avenue and Queens Boulevard.

Taking Our Seat's Analysis of District Lines Proposed in *Favors*

Taking our Seat reviewed the proposed district in *Favors* from the perspective of stopping SAA voter dilution by drawing 'mosaic districts.'

Assembly Majority Plan:

This plan keeps the vast majority of three (Richmond Hill, Briarwood and Bellerose) of the four SAA neighborhood clusters together within in the proposed 6th Congressional district; splitting portions of the Bellerose cluster. Ideally, all three areas should be kept whole and together. The remaining neighborhood cluster (Jackson Heights) is kept whole with the 7th Congressional district.

The Assembly Majority's proposed 5th Congressional district in Queens should be modified at the "bridge" connecting the northern and southern portions of the district. By moving that bridge West of Crossbay Boulevard the Court will help keep the Richmond Hill and South Ozone Park community of interest together in the proposed 6th district.

Senator Skelos's Plan:

This plan keeps two (Richmond Hill, Briarwood) of the four SAA neighborhood clusters together within the proposed 5th Congressional district. Unfortunately, the boundaries of the 5th district split the Bellerose cluster in two, diluting the SAA vote. The remaining neighborhood cluster (Jackson Heights) is kept whole with the proposed 6th Congressional district's central Queens portion.



Assemblymember Kolb's Plan:

This plan does not remedy SAA voter dilution. Kolb's proposed Congressional district 6 combines fractured portions of the Richmond Hill cluster and Briarwood cluster. Kolb's proposed Congressional district 5 fractures Richmond Hill and Briarwood where the SAA community of Queens is a meaningless appendage to the racial composition of the district.

Similarly, Kolb's district 16 covers only a majority of the Jackson Heights cluster but combines this cluster with portions on the Bronx and Westchester County thereby combining communities that do not share common interest.

Intervenors Lee's and Ramos's Plan:

This plan keeps two (Richmond Hill and Briarwood) of the four SAA neighborhood clusters together within the proposed 6th Congressional district. The eastern boundary of this district encompasses portions of the Bellerose cluster. The remaining portion of that cluster is found in combination with the Jackson Heights cluster to form proposed Congressional district 5, keeping SAA communities of interest together.

Intervenor Rose's Plan:

This plan keeps the vast majority of only two (Richmond Hill and Briarwood) of the four SAA neighborhood clusters together within the proposed 6th Congressional district. The western boundary of the proposed 6th Congressional district should be moved further West to encompass more of South Ozone Park.

Proposed Congressional district 4 splits the SAA neighborhood cluster of Bellerose, Queens Village, Glen Oakes and Floral Park, diluting the SAA vote.

Proposed Congressional district 7 encompasses all of the Jackson Heights cluster.

Common Cause Plan:

This plan's proposed 9th Congressional district encompasses the Bellerose cluster but removes certain parts of the cluster north of Union Turnpike, ideally this area would be added to the district.

This plan's proposed 6th Congressional district encompasses the Richmond Hill cluster and the Briarwood cluster together and keeps these two communities of interest together.



TAKING OUR SEAT

The South Asian Voice in Redistricting

This plan's proposed 5th Congressional district dilutes the SAA vote where it abuts the proposed district 9th in Jackson Heights. Either the proposed 9th or the 5th district should encompass this cluster in its entirety.

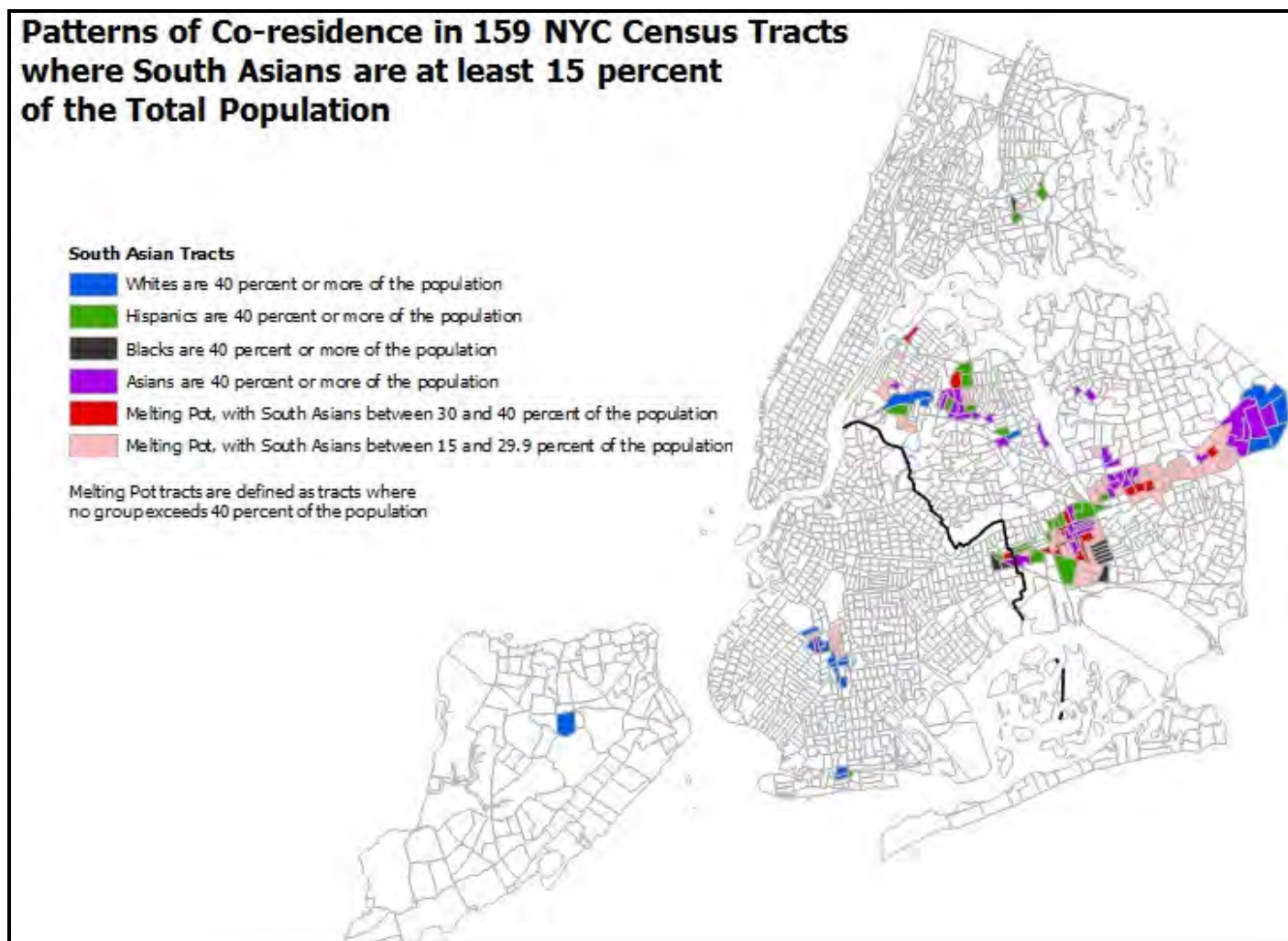
Conclusion

Thank you for the opportunity to comment. Taking Our Seat is hopeful that the redistricting process brings justice to those in our community victimized by voter dilution. Ideally, by keeping the Jackson Heights, Richmond Hill, Briarwood and Bellerose clusters whole and as anchors in their own congressional district, the Court will stop SAA voter dilution while drawing a truly multicultural, or mosaic district.

###



Mosaic District Data





COUNTY OF ONEIDA
OFFICE OF THE COUNTY EXECUTIVE
ONEIDA COUNTY OFFICE BUILDING
800 PARK AVENUE
UTICA, NEW YORK 13501
(315) 798-5800
FAX (315) 798-2390
www.ocgov.net

ANTHONY J. PICENTE, JR.
County Executive
ce@ocgov.net

March 2, 2012

To Whom It May Concern:

I am writing in regards to the proposed reapportionment process at the federal level. Having served as Oneida County Executive since 2007, I have a unique insight into the needs of the County and how we are served by the federal government.

Oneida County is located in the 24th Congressional District, represented by Congressman Richard Hanna. This district stretches from the Utica area through Chenango and Cortland Counties into Broome and Tioga Counties.

Oneida County is unique in many ways. One of the more obvious is that it is one of only a few counties in New York State to include 3 cities in its borders. Along with these 3 cities, there are 26 towns and 19 villages. Despite all of those boundaries, this county is a cohesive economic unit, with more than 90 percent of the people who work within the county living within the county.

Currently, all of Oneida County, with the exception of 8 towns, is located in the 24th Congressional district served by Congressman Richard Hanna. On behalf of the people I serve, I am respectfully asking today on that the redistricting plan that is adopted continue to include as much of Oneida County as possible, if not the entire county, within one Congressional District.

The reason for this goes beyond simple unity, although I believe you will agree that carving counties apart to draw district lines is a practice that should be avoided where possible. Defense related companies are very important to the economy here in Oneida County, and they are located in multiple communities, chiefly Utica and Rome. Currently, when there is an issue that impacts defense-related employers, most of them are in one district served by Congressman Hanna, who has done an exceptional job in his representation of our defense-related employers and federal assets. The stronger this connection, the better our economy can survive. Diluting this connection by fragmenting the county into multiple districts would be a disservice to the people who look to Congress for support.

Oneida County has long been a proponent of regional partnerships with our neighbor to the east, Herkimer County. From transportation planning to workforce development to public health, this is a strong, vibrant partnership. The partnership will be best served by continuing to keep Herkimer County in the same Congressional District with Oneida County, because with so many common interests, representing one county is the same as representing the other.

I realize that the process of redistricting must deal with the unpleasant reality that because of population loss we will lose 2 congressional seats here in New York. I understand that decisions must be made. However, I believe that the guiding principle behind these decisions should be to avoid doing harm to the people who will have to live with the decisions made during this process. Thus, I respectfully request that to the greatest extent possible, the goal of this process should be to maximize the amount of Oneida County that is served by a single Congressional District, and that this district should also include Herkimer County.

I appreciate you taking my request into consideration.

Regards,

Anthony J. Picente Jr.
Oneida County Executive