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March 2, 2012

VIA ECF

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

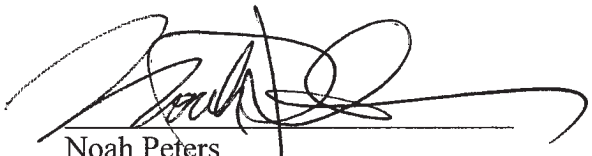
Re: Favors v. Cuomo, 11-CV-5632 (DLI) (RR) (GEL) (RLM)

Dear Magistrate Judge Mann:

Please find enclosed the Lee Intervenors' response to the congressional redistricting plans submitted by other parties in this action, as well as Common Cause's Plan.

Respectfully Submitted

KAYE SCHOLER LLP



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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARK A. FAVORS, et al.,

Plaintiffs,

11CV 5632 (DLI)
(RR)(GEL)(RLM)

v.

ANDREW M. CUOMO, et. al.,

Defendants.

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LEE INTERVENORS' RESPONSE TO CONGRESSIONAL REDISTRICTING PLANS SUBMITTED TO MAGISTRATE JUDGE ROANNE MANN PURSUANT TO ORDER DATED FEB. 27, 2012

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In addition to the plan submitted by the Asian American Legal Defense and Education Fund (AALDEF), Plaintiff-Intervenors submit these comments concerning the six (6) congressional redistricting plans submitted to the Court, as well as the Common Cause New York plan that was submitted to the Legislative Task Force On Demographic Research and Reapportionment (LATFOR), pursuant to the February 27, 2012 Order issued by this Court.

Plaintiff-Intervenors are four Asian American registered voters in New York State who reside in neighborhoods with large Asian American populations in the boroughs of Queens and Brooklyn, in the City of New York. Plaintiff-Intervenors seek congressional redistricting that does not violate the "one person, one vote" principle under Article I, Section 2 of the Constitution of the United States and the federal Voting Rights Act of 1965. They desire to have their vote weighted equally with those of all other citizens of the City and State of New York.

Plaintiff-Intervenors seek to keep Asian American communities of interest together as new boundaries for congressional district are drawn. Keeping communities together will ensure that Asian Americans will have a full and fair opportunity to elect candidates of their choice, in accordance with the Voting Rights Act of 1965. 42 U.S.C. § 1973(b).

Of the six (6) congressional redistricting plans submitted to the Court in addition to our plan, the submissions by Latino Justice/PRLDEF and the Center for Law and Social Justice (CLSJ) are acceptable; they comply with the United States Constitution, the federal Voting Rights Act of 1965 and keep Asian American communities of interest together. The Common Cause New York plan that was submitted to the Legislative Task Force On Demographic Research and Reapportionment (LATFOR) is generally acceptable as well.

The congressional redistricting plans submitted by the Senate Majority defendants, Assembly Minority defendants and the Rose Plaintiff-Intervenors do not respect Asian American

communities of interest, dilute minority voting strength, and should not be adopted by this Court. The plan submitted by the Assembly Majority defendants does not divide Asian American communities of interest as egregiously as the other defendants' plans. However, the district configurations could be significantly improved to unite similar Asian American communities of interest, providing a better opportunity for Asian Americans to elect candidates of their choice, as illustrated in the Unity Map.

Standard of Review

In the Court's Order referring the task of preparing a congressional redistricting plan to Your Honor, it directed, *inter alia*, that "Districts shall . . . preserve communities of interest" and "shall comply with 42 U.S.C. §1973(b) and with all other applicable provisions of the Voting Rights Act." (Dkt. 133 at 3). This language comports with the U.S. Supreme Court's directive that under Section 2 of the Voting Rights Act, voting districts should encompass minority "communities of interest." *League of Latin American Citizens v. Perry*, 548 U.S. 399, 433 (2006). Indeed, courts have long recognized that "[t]he equal protection clause of the fourteenth amendment guarantees the opportunity for equal participation by all voters, and redistricting plans that do not achieve fair and effective representation for all citizens impair the basic and fundamental rights secured by this amendment." *Puerto Rican Legal Defense and Educ. Fund, Inc. v. Gantt*, 796 F.Supp. 681, 687 (E.D.N.Y.1992) ("PRLDEF") (citing *Reynolds v. Sims*, 377 U.S. 533, 566 (1964)).

Background

We urge this Court to utilize the previously submitted Asian American Neighborhood Maps (Attachment A to February 29, 2012 Submission); the Asian American Communities of Interest Survey (Attachment B to February 29, 2012 Submission) and the Unity Map (Block

Equivalency files submitted with February 29, 2012 Submission) in analyzing the various redistricting plans being considered. This Court should superimpose or overlay the Asian American Neighborhood Boundaries over each proposed redistricting plan to determine if Asian American communities of interest are kept whole and grouped with other similar Asian American communities of interest as detailed in our February 29, 2012 submission and Asian American Community of Interest Survey (Attachment B to February 29, 2012 Submission).

History of Asian American Voter Disenfranchisement in New York

Asian Americans have been historically disenfranchised in the redrawing of district boundaries and in their right to vote. *Cf.* S. Rep. No. 94-295, 94th Cong., 1st Sess. 28-30 & n. 21 (1975) (noting that "[d]iscrimination against Asian Americans is a well known and sordid part of our history."); 42 U.S.C. §§ 1973b(f), 1973l(c)(3) (extending the Voting Rights Act to cover "language minorities," including "persons who are . . . Asian American."). AALDEF has a long history in defending the voting rights and political representation of Asian Americans.

In the past, redistricting plans have diluted Asian American voting strength by fragmenting communities into multiple districts. See U.S. Comm. on Civil Rights, *Civil Rights Issues Facing Asian Americans in the 1990s*, 159-161 (1992). Past and current congressional district boundaries in Queens have divided Asian American communities.

Between 1997 and 2002, Flushing was divided among congressional districts ("CD") 5, 7, and 18. CD5 included Bayside and the eastern portion of Flushing. CD7 included part of Elmhurst and the western portion of Flushing. CD18 came down from Westchester and included a strait in Flushing between CDs 5 and 7. The areas with the greatest Asian concentrations in Elmhurst were, likewise, divided among CDs 7, 9, and 18. While the western part of Elmhurst was in CD7, the eastern part was in CD9. A smaller area of Asians in the far eastern part of

Elmhurst was in CD18. The Asian American vote in Flushing/Bayside and Elmhurst are each diluted among different congressional districts.

Even after the redistricting of 2002, these communities remain divided among different congressional districts. Flushing/Bayside is currently divided between CD9 and CD5, and Elmhurst is divided among CDs 5, 7, 9 and 12.

In light of this history, every effort should be made to keep Asian American communities together and avoid the mistakes of the past in this current round of congressional redistricting.

Asian American Population in New York City

Asian Americans are the fastest growing racial minority group in New York City. The Asian American population in New York City has increased 32% over the past decade and now constitutes almost 13% of the city's population, numbering 1,028,119.[1] Seven out of ten Asian New Yorkers reside in three boroughs: Queens, Brooklyn and Manhattan.

CENSUS 2010	Total Population	Asian Population	Asian Percent of Total	Total Growth Since 2000	Asian Growth Since 2000
New York State	19,378,102	1,406,194	7.3%	2.1%	35.7%
New York City	8,175,133	1,028,119	12.6%	2.1%	31.8%
- Queens	2,230,722	508,334	22.8%	0.1 %	30.6%
- Manhattan	1,585,873	177,624	11.2%	3.2%	24.0%
- Brooklyn	2,504,700	260,129	10.4%	1.6%	41.2%

* Only includes those who checked "Asian" and no other race.[2]

[1] U.S. Census Bureau, 2010 and 2000 Census.

[2] The "Not Hispanic Asian alone" number should be taken as the minimum number of Asian Americans. In the 2000 and 2010 censuses, respondents were allowed to mark more than one race, resulting in the category "alone or in combination," which includes people who reported a single race alone (*e.g.*, Asian) and people who reported that race in combination with one or more of the other race groups (*i.e.*, White, Black or African American, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and Some Other Race). In addition, race and ethnicity are considered separate and distinct identities, with a separate question on Hispanic or Latino origin. This means that all respondents are also categorized as "Hispanic or Latino" and "Not Hispanic or Latino." A more accurate and inclusive estimate of Asian Americans would be to aggregate both the Hispanic and Not Hispanic Asian alone or in combination populations. Accordingly, the total Asian American population citywide is actually 1,134,919, or 13.9% of the total New York City population.

Asian American populations have increased faster than the overall growth rate of the boroughs in which they reside. In Queens, the Asian American population has grown over 300 times faster than the overall rate of the borough, over 25 times faster than Brooklyn's growth, and over 7 times faster than Manhattan's growth. New York has the largest Asian American population of any municipality in the nation. Yet, no Asian American has ever been elected in New York to the U.S. Congress.

In the neighborhood areas reviewed in our survey, AALDEF found that Asian Americans shared many tangible interests and concerns. Furthermore, residents also had consensus on the areas' boundaries. These communities of interest should not be divided when political districts are redrawn. Additionally, community members identified other areas and neighborhoods that were either similar to or different from their own neighborhoods. These findings should inform redistricting decisions about which areas to include within congressional districts, since such districts typically encompass multiple neighborhoods.

The Unity Map best reflects the demographics and communities of interest in New York City and should be adopted. All of the defendants' proposals, and the Rose plaintiff-intervenors' proposal do not protect Asian American communities of interest and dilutes Asian American voting strength, and should not be adopted by this Court.

Discussion

We caution this Court not to focus solely on the Asian American percentages of Asian Americans in each proposed district for each plan in determining whether the Asian American community has been disenfranchised or their voting strength diluted. Similar Asian American communities of interest should be grouped together into one congressional district, where possible, according to community, geography, needs, and common issues.

Dividing portions of densely populated Asian American communities of interest and combining them with fragmented Asian American populations across New York City deprives Asian Americans of the opportunity to elect candidates of their choice. This Court is specifically referred to the Senate Majority defendants' plan, discussed in more detail below.

It is instructive that the civil rights groups representing Plaintiff-Intervenors are members of federally protected groups under the Voting Rights Act of 1965 and have all submitted one identical plan that protects and preserves the voting rights of racial minority groups in New York – the Unity Map. The Court should adopt the Unity Map configuration, or at the very least, use the Unity Map as a benchmark to measure the other proposals' adherence to the Voting Rights Act and the degree to which minority voting strength and communities of interest have been respected.

Our analysis of the plans submitted by other parties and Common Cause New York is discussed below.

I. Senate Majority Defendants' Proposed Plan

The plan submitted by the Senate Majority defendants divides Asian American communities of interest and prevents Asian Americans from electing candidates of their choice. This plan does not respect communities of interest and should not be adopted by this Court.

Proposed CD6 (30.85% Asian American): Although the proposed district has an Asian American population of 30.85%, it divides geographically compact Asian American communities of interest. In particular, proposed CD6 divides the communities of Flushing, Bayside, Queens Village/Bellerose/Floral Park/Glen Oaks, Jackson Heights and Woodside. Only the community of Elmhurst is kept whole.

Flushing is the cultural, economic and social hub of the Asian American community in Queens. It is imperative that Flushing, in particular, be kept whole. Asian Americans in Flushing are politically cohesive, especially between the two largest Asian ethnic groups, Chinese Americans and Korean Americans. During the November 2001 City Council elections, 94% of Chinese American voters and 90% of Korean American voters voted for John Liu. See also Jennifer Lee, *Poll Finds Asian Overwhelmingly Back Liu*, N.Y. Times City Room (blog) (Sept. 18, 2009), *available at* http://cityroom.blogs.nytimes.com/2009/09/18/poll-finds-asians-overwhelmingly-backed-liu/. CD6 splinters major communities of common interest and should not be adopted by this Court.

Proposed CD11 (15.63% Asian American): Proposed CD11 divides Manhattan's Chinatown and does not respect this Court's ruling in *Diaz v. Silver*, 978 F.Supp. 96 (E.D.N.Y. 1997), *aff'd*, 522 U.S. 801 (1997), which involved New York's 1992 round of congressional districting. The Court noted extensive ties between the Sunset Park area in Brooklyn and the Chinatown neighborhood of Manhattan, two communities joined within the current 12th Congressional District. See *id.* at 101-102, 124.

With respect to the 2002 round of congressional districting, the Special Master appointed by the Court, Frederick Lacey, sought to preserve "the cores of current districts and the communities of interest that have formed around them" in drawing congressional boundaries. See *Rodriguez v. Pataki*, No. 1:02-cv-00618-RMB-FM, Dkt. 37("Report and Plan") at 14 (May 13, 2002), *available at* http://www.senate.mn/departments/scr/redist/redsum2000/New_York_Congress/planandreport.pdf.

In approving the Special Master's Plan, the Court noted that "[t]he Lacey Plan safeguards the voting strength of minority populations protected under the Voting Rights Act," noting specifically that it preserved District 12, "in which protected minorities combined currently constitute a majority of the voting age population . . . and elect minority candidates." *Rodriguez*, 2002 WL 1058054 at *2 (S.D.N.Y. May 24, 2002). The Court also found that the Lacey plan "respects the redistricting principles of compactness, contiguity, pre-existing political subdivisions, and preservation of communities of interest." *Id.* at *5.

Residents of both Chinatown and Sunset Park continue not only to share community resources and are interdependent, but they also share many similar concerns and socio-demographic and political characteristics. Any proposed redistricting plan adopted by this Court must keep Chinatown and Sunset Park united in one congressional district. Proposed CD11 fails to do so, because it divides communities of interest, contrary to the *Diaz* court precedent.

CD11 also divides the communities of Woodside and Jackson Heights, slicing through the core of both neighborhoods. Jackson Heights is a diverse neighborhood of mostly South Asian and Latino residents. Many of the residents are limited English proficient and require some form of language assistance. Many South Asian residents have limited access to interpreters and face greater difficulties in applying for government entitlements. There are common concerns in this community including lack of green space and recreational facilities, high traffic congestion, insufficient number of parking spaces, overcrowding and congestion, and inadequate infrastructure to accommodate the growing population. Jackson Heights should not be divided into numerous districts. Since CD11 is drawn contrary to this Court's precedent and splinters communities of common interest, it should not be adopted by this Court.

Proposed CD5 (15.34% Asian American, 11.9% Other ("Other" Population is Mostly South Asian and Indo-Caribbean)): Proposed CD5 divides the community of Queens Village/Bellerose/Floral Park/Glen Oaks almost in half, through the middle of the community-defined boundary. Proposed CD5 does keep the communities of Richmond Hill/South Ozone Park and Briarwood/Jamaica Hills whole. Most of the Asian Americans in Richmond Hill/South Ozone Park are Indo-Caribbeans or Asian Indians. Indo-Caribbeans share a unique diasporadic history, leaving India as indentured servants more than a century ago and arriving in Caribbean nations, most often Guyana, Suriname, and Trinidad. Their second migration was to the United States, specifically settling in Richmond Hill, Queens. Richmond Hill/South Ozone Park should be kept whole in one congressional district. Proposed CD5 should be adjusted so that it does not divide the community of Queens Village/Bellerose/Floral Park/Glen Oaks.

Proposed CD12 (18.46% Asian American): Proposed CD12 divides the communities of Flushing and Jackson Heights and should not be adopted by this Court. Proposed CD12 achieves an Asian American percentage of over 18%, but does so by tearing through pockets of these densely populated Asian American communities, rather than keeping these geographically compact neighborhoods with common interests whole.

Proposed CD4 (9.4% Asian American): Proposed CD4 divides the Asian American communities of Bayside and Queens Village/Bellerose/Floral Park/Glen Oaks, and should not be adopted by this Court.

II. Assembly Minority Defendants' Proposed Plan

The proposed plan submitted by the Assembly Minority defendants divides Asian American communities of common interest and does not follow this Court's precedent, depriving Asian Americans of the opportunity to elect candidates of their choice. It should not be adopted by this Court.

Proposed CD12 (18.4% Asian American): Proposed CD12 divides the community of Chinatown almost in half and is contrary to this Court's ruling in *Diaz v. Silver*, *supra*, and subsequent redistricting decisions, discussed above. Chinatown is the historical entry point for many Asian Americans and is home to a distinct community that has many unique needs not shared with its wealthier, less diverse surrounding neighborhoods. It is essential that Chinatown be kept whole in one congressional district with Sunset Park. Proposed CD12 does not keep Chinatown whole, is contrary to this Court's precedent and thus, should not be adopted.

Proposed CD4 (31.5% Asian American): Proposed CD4 does not divide the communities of Flushing, Bayside and Queens Village/Bellerose/Floral Park/Glen Oaks and groups these communities into one congressional district with western Nassau County. The aforementioned communities share more commonalities with other communities in Queens, rather than Nassau County, and should be adjusted accordingly.

Proposed CD6 (22.1% Asian American): Proposed CD6 divides the communities of Elmhurst, Jamaica Hills, Richmond Hill/South Ozone Park and Ozone Park. Elmhurst has a large low-income Asian American population with shared needs and is currently divided into four (4) congressional districts. Elmhurst should not continue to be splintered among numerous

congressional districts. CD6 should be adjusted so that Elmhurst and the other communities of interest are kept whole within this district configuration.

Proposed CD9 (15.5% Asian American): Proposed CD9 divides the densely populated communities of Woodside and Ozone Park in Queens and Bensonhurst in Brooklyn and should not be adopted by this Court.

Proposed CD16 (15.3% Asian American): Proposed CD16 divides the densely populated communities of Woodside and Elmhurst and should not be adopted by this Court. The communities of Jackson Heights and Elmhurst can be kept whole and together in one congressional district as demonstrated in the Unity Map.

III. Assembly Majority Defendants' Proposed Plan

The plan submitted by the Assembly Majority defendants keeps more Asian American communities of interest whole, as compared to the plans submitted by the other defendants. However, the proposed configuration, with no district having an Asian American percentage of more than 25.15%, does not realize the full potential of the Asian American population and communities in New York City and restricts their ability to elect candidates of their choice. There are over one million Asian Americans residing in New York City and over 500,000 residing in Queens alone. The Court should not adopt this proposed configuration and should look to the Unity Map as an illustration of fair congressional districts for all New Yorkers.

Proposed CD7 (25.15% Asian American): Proposed CD7 keeps the community of Bayside whole, but divides Flushing, Jackson Heights and Elmhurst. This district unwisely unites Flushing and Bayside with communities in the Bronx. This district should be adjusted to keep

Flushing whole with Bayside with other similar communities in Queens, as demonstrated in the Unity Map.

Proposed CD12 (19.26% Asian American): Proposed CD12 includes the community of Sunset Park and portions of Manhattan's Chinatown, and Woodside and Ozone Park in Queens. This proposed district should be adjusted to include all of the community-defined boundaries of Chinatown.

Proposed CD5 (24.67% Asian American): Proposed CD5 does not keep a single Asian American community of interest whole; rather it divides the communities of Elmhurst, Jackson Heights, Woodside, Flushing, Richmond Hill and Ozone Park. At a minimum, this district should be adjusted to keep these communities whole.

Proposed CD6 (14.87% Asian American): Proposed CD6 keeps the community of Briarwood/Jamaica Hills whole and together in one district, but divides the communities of Richmond Hill and Queens Village/Bellerose/Floral Park/Glen Oaks. At a minimum, this district should be adjusted to keep the communities of Richmond Hill and Queens Village/Bellerose/Floral Park/Glen Oaks whole.

IV. Rose Plaintiff-Interevenor's Proposed Plan

The plan submitted by the Rose Plaintiff-Intervenors divides numerous Asian American communities of interest, does not follow this Court's precedent, and should not be adopted by this Court.

Proposed CD11 (15.71% Asian American): Proposed CD11 divides the community of Chinatown almost in half, divides the community of Sunset Park and is contrary to this Court's

ruling in *Diaz v. Silver*, *supra*, and subsequent redistricting decisions, discussed *supra*. It is essential that Chinatown be kept whole in one congressional district with Sunset Park. Proposed CD12 does not keep Chinatown or Sunset Park whole and is contrary to this Court's precedent and thus, should not be adopted.

Proposed CD5 (27.2% Asian American): Proposed CD5 keeps the community of Flushing whole, but divides Bayside almost in half and also divides Briarwood. This district unwisely unites Flushing and portions of Bayside and Briarwood with communities in the Bronx. This district should be adjusted to keep Bayside and Briarwood whole and then keep Flushing and Bayside together with other similar communities in Queens, as demonstrated in the Unity Map.

Proposed CD7 (23.21% Asian American): Proposed CD7 keeps the communities of Jackson Heights and Elmhurst whole, but divides the communities of Woodside, Richmond Hill/South Ozone Park and Ozone Park. At a minimum, this district should be adjusted to keep the communities of Woodside, Richmond Hill/South Ozone Park and Ozone Park whole.

Proposed CD4 (12.9% Asian American): Proposed CD4 divides the communities of Bayside and Queens Village/Bellerose/Floral Park/Glen Oaks, and groups them with neighborhoods in Nassau County. This district should be adjusted to keep these communities whole and kept with similar communities in Queens, not grouped with Nassau County.

Proposed CD6 (12.94% Asian American): Proposed CD6 divides the communities of Richmond Hill/South Ozone Park, Briarwood and Queens Village/Bellerose/Floral Park/Glen Oaks. This district should be adjusted to keep these communities whole.

V. Common Cause New York's Proposed Plan

The map proposed by Common Cause New York generally keeps Asian American communities of interest whole and grouped together with other similar communities of interest in New York City. It is an acceptable alternative to the Unity Map proposal for New York City, with respect to Asian American populations. Indeed, there is substantial overlap of district configurations with the Unity Map.

Proposed CD9 (37.4% Asian American): Proposed CD9 is similar to the proposed CD5 in the Unity Map, and groups together the communities of Elmhurst, Flushing, Bayside and Queens Village/Bellerose/Floral Park/Glen Oaks. The community of Queens Village/Bellerose/Floral Park/Glen Oaks is not kept whole. This district could be improved by keeping all communities within this district whole.

Proposed CD12 (20.1% Asian American): Proposed CD12 is similar to the Unity Map and keeps Chinatown and Sunset Park whole and together in one congressional district consistent with this Court's precedent.

Proposed CD6 (12.2% Asian American): Proposed CD6 keeps Richmond Hill/South Ozone Park whole but divides a section of Ozone Park. In 2000, CD6 was drawn as a majority African American district. Proposed CD6 is 45.1% African American. The Unity Map was able to create a similar district with an African American percentage closer to a majority, at 48.1%.

VI. Latino Justice/PRLDEF's Proposed Plan

The proposed Unity Map submission complies with the United States Constitution, the federal Voting Rights Act of 1965, protects the voting rights of federally protected minority

groups and keeps communities of interest together. This Court should adopt the Unity Map proposal.

VII. Center for Law and Social Justice's Proposed Plan

The proposed Unity Map submission complies with the United States Constitution, the federal Voting Rights Act of 1965, protects the voting rights of federally protected minority groups and keeps communities of interest together. This Court should adopt the Unity Map proposal.

Conclusion

For the aforementioned reasons, Your Honor should adopt the Unity Map proposed by AALDEF, Latino Justice/PRLDEF and CLSJ, and redraw congressional districts that keep Asian American communities together, thereby ensuring the meaningful representation of this historically disenfranchised and underrepresented community in full compliance with the federal Voting Rights Act of 1965 and the United States Constitution.

Dated: March 2, 2012

Respectfully,

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