



## Center for Law and Social Justice

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March 6, 2012

### VIA ECF

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

**Re: Favors v Cuomo  
11. Civ. 5632  
(DLI) (RR) (GEL)**

Dear Judge Mann:

Plaintiffs-intervenors Donna Drayton et al., by their undersigned counsel, respectfully submit this letter in response to the Court's Order, dated March 5, 2012, directing the parties to show cause as to why the draft redistricting plan ("Proposed Plan") prepared by the Court should not be presented to the Three-Judge Panel as the recommendation of this Court.

Plaintiffs-Intervenors, generally approve of the Proposed Plan's districts for New York City, except for the minor but serious objections and recommendations detailed in the chart attached hereto.

This corrected letter is being sent because "added" was, inadvertently, left out of the last line of our comments as to congressional district 16 of the Proposed Plan.

Respectfully submitted,

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All counsel (via ECF)

DISTRICT #	COMMENTS
CD5 (QUEENS)	<p>Ozone Park and Howard Beach should be completely <b>included</b> in CD5 and <b>removed</b> from CD8. The residents of both of these Queens areas form communities of interest regarding, inter alia, their proximity to JFK airport. They should not be joined with East New York area of Brooklyn.</p>
CD8 (BROOKLYN and QUEENS)	<p>We strongly recommend <b>removing</b> the Queens areas of <b>HOWARD BEACH and Ozone Park</b>, and <b>following the Unity Plan in Southeast Brooklyn</b>. We additionally recommend <b>returning</b> to CD8 the closely related areas of Fort Green, Clinton Hill along with Downtown Brooklyn, Brooklyn Heights and Williamsburg. These adjoining neighborhoods are the transportation and commercial gateways to the central areas of Brooklyn that the remainder of the Court's 8CD covers.</p> <p>This is a traditional VRA district (formerly 11CD) that was created for Black voters. It has covered parts of East and North Brooklyn that are heavily populated by Blacks: Bedford- Stuyvesant, Fort Green, Ocean Hill, East New York, and Starret City, as well as the neighboring areas on the north of Brooklyn Heights, Williamsburg and Highland Park.</p> <p>Howard Beach and the Gerritsen Beach area are not communities that have common interests with the majority of residents in the 8CD.</p> <p>Adding Ozone Park to this district forces the neighborhoods of Downtown Brooklyn, Clinton Hill, and Fort Green to be jettisoned and put into District 9. The boundary line between 7 and 8 along Broadway could be straightened out to coincide with Broadway (like before). The boundary between 8 and 9 could be straightened out along Flatlands Avenue.</p>
CD9 (BROOKLYN)	<p>This district should honor the east-west orientation of North Brooklyn and the Southeast orientation of the Black communities in Central Brooklyn below Atlantic Avenue. The <b>Brownsville</b> and <b>Flatlands</b> areas should be <b>returned</b> to the CD9 district. The <b>Cobble Hill</b> and <b>Fort Green</b> areas should be <b>removed to CD 8</b>. The boundary between CD8 and CD9 could be straightened out along Flatlands Avenue.</p> <p>This is the original VRA district (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, Prospect Heights, Brownsville, East Flatbush, Prospect Lefferts Gardens, along with Wingate, and parts of Park Slope.</p>

DRAYTON, et al, Plaintiff INTERVENORS

<b>CD16 (BRONX/WESTCHESTER)</b>	<b>Rye, Scarsdale, and Eastchester should be removed and Greenburgh and the Mount Pleasant areas added.</b>