

I offer the following comments on the draft plans proposed by the Independent Redistricting Commission (IRC).

1. Give the public more time to review and comment on proposed plans. In the future, hire professional staff that have the skills to design and present proposed plans and maps that can be quickly read and understood by the general public. The current draft plans do not meet this standard, which is shameful, given the public funding for and the public purpose of the IRC. For example, there is no explanation of “Letter” and “Name” plans, or whether the draft plans should be downloaded or viewed on the website. The draft maps on the website lack keys or legends that explain the detailed data accompanying the maps. A review of a “Names” draft map of Senate District 31 presented statistics for CVAP\_15191, CVAP\_15192, and CVAP 15193, leaving the public to guess what exactly this was supposed to represent. The ESRI map function of the draft plans is slow and clunky, and the fact that two websites are needed to view proposed and current maps and data makes comparisons difficult. The downloadable zip files include a bunch of files with no explanation of the contents and how they might be accessed. This work as presented on the website actually impedes public participation in an important process that affects every single New Yorker. In the future, the demographic data, the maps, and the map-making software must be made readily available to the public in an easily usable and easily understood format.
2. Provide the public with a clear, written explanation of how decisions about political district boundaries were made. What criteria were prioritized and why in redrawing district boundaries? When the public can understand why maps were drawn in a certain way, paths to dialogue and constructive input become accessible, and the risk of litigation by interest groups could be reduced. Right now, for example, it is not clear what the justification or rationale might be for the lines drawn either in the “Names” or “Letters” presentation. While the IRC has stated on its website that it must consider the denial or abridgement of minority language voting rights, and the maintenance of communities of interest, there is no explicit evidence in the plans as to how this was done.

The pdf presentation of the “Letters” plan does not even provide data on the White population and the White citizen voting-age population. There is no analysis of prior voting patterns by racial and language minority groups, which would help to assess whether racial or language minorities are able to elect candidates of their choice, and whether proposed boundary lines are facilitating the election of White-preferred candidates, while denying the ability of racial or language minorities to elect candidates that they believe best represent them. Additionally, the Hispanic population in New York City is not a monolith. It is large, and ethnically and racially diverse, and Census data should be analyzed and presented in a way that reflects that reality as part of the redistricting process. The draft plans presented appear to indicate that the IRC isn’t really doing all of the work necessary to draw boundaries that do not dilute or diminish

the ability of racial minorities to elect candidates of their choosing, that actively facilitate and promote minority voting rights.

Similarly, the proposed Senate District 31 and Congressional District 113 maps for my community of Inwood appear to violate the notion of a community of interest by going into such distinct neighborhoods and communities, even crossing borough lines.

For example, the Senate District consists primarily of very different communities in Washington Heights and Inwood, as measured by characteristics on education, home ownership, income, and citizenship, and by neighborhood. These communities would elect different leaders if they were separate districts. Additionally, the demographics are such that separating the district into two Senate Districts would increase competition by allowing candidates of diverse racial and ethnic backgrounds to run for office, and would increase the ability of racial minorities (specifically Black people, including Black Hispanics) to elect a candidate of their choice.

Senate District 31 goes far south in Manhattan into neighborhoods that are far different demographically than Washington Heights and Inwood, and that have very different economic and business constituents. It is fair to ask whether that part of the current Senate District 31 comprises a distinct community of interest that is separate from Washington Heights and Inwood. Eliminating that part of the district from the new Senate District 31 would give voters there greater facility to solve problems and create the kind of community they want to see via the electoral process. They can't do that now, as they are outnumbered by voters in Washington Heights and Inwood.

Thank you for your work on this difficult project and for considering my comments.

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