Greetings to the Honorable Independent Commissioners and Citizens of New York State. I am a citizen of Manhattan in Congressional District 10. I was born in Manhattan, lived here most of my life, earned a Masters in Public Administration from Columbia University, and am now retired from the field of ecological policy and law. I will keep my testimony brief in view of the time constraints facing the Commission.

There are two guiding principles at all levels: voting equitability: the principle that every vote counts for exactly the same value (or as close to exactly as possible), and shared commonality of interest: the principle that political legitimacy follows only when persons sharing common interests are represented by leaders responsive to their local interests in the political system. While what constitute shared common interests can vary greatly, shared common interests are locally derived, that is, they are strongly impacted by the socio-economic conditions of the place where voters live (i.e. their socio-economic ‘ecosystem,, to borrow an ecological term). These two principles should operate independently of partisan considerations, as well as of 'race-to-the-bottom' arguments such New York must gerrymander because some other state is gerrymandering. A plan which observes these principles in its execution is likely to be both durable and responsive, and thus be deeply satisfactory over the long run to the citizens of this magnificent state.

When districts contain significantly skewed population numbers the principle of equitability is violated: some citizens are over-represented, while others are under-represented. When districts stretch across vastly different geographical ecosystems, the interests of its citizens can be vastly different as well, creating the potential for unresponsive representation of one or more sub-groups within the district.

Looking at the proposed maps submitted on September 15, 2021 by the Commission, and in view of the above principles I make the following observations:

The six districts furthest away from the average population per district are: 23 (-10.7%), 22 (-10.3%), 19 (-10.1%), 21 (-9.3%), 24 (-7.7%), and 27 (-7.3%) (i.e. these districts are currently over-represented). The 'Letters' plan does an adequate job of combining these districts to adjoining areas, except for 21, which appears to be more or less as before (the 'Names' plan re-districts the lakeside portion 21, and perhaps his should be done in the 'Letters' plan, if possible). The 'Names' plan seeks to address the same population over-representation by creating a district called 'JeffersonUlster', which stretches all the way from the Lake Ontario coast to the Catskills. This district violates the commonality of interests principle: the representational interests of Catskill area residents are likely to be quite different from lakeside residents. // On the other side of the equitability range (under-representation), there are 3 New York City districts with populations exceeding the district averages: 12 (+4.5%), 10 (+3.5%), and 8 (+3.5%). It is difficult for me to see and compare the proposed maps in these areas on my computer screen, but I suggest that these districts should be redistricted in such a way as to create more equitable representation for the citizens residing there, who are currently being under-represented in comparison to other districts in the State. If this requires the creation of a new district in the New York City Metropolitan region, so be it.

While this comment applies to the proposed Congressional redistricting maps, the same approach is appropriate for the State Assembly and State Senate redistricting: re-districtin based on the principles of equitability and shared interests.

Respectfully Submitted,

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