



AMY R. PAULIN
Assemblywoman 88th District
Westchester County

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March 8, 2023

Ken Jenkins, Chair
Charles Nesbitt, Vice Chair
Independent Redistricting Commission
250 Broadway, 22nd Floor
New York, NY 10007

Dear Chair Jenkins, Vice Chair Nesbitt and members of the Independent Redistricting Commission,

Thank you for accepting testimony on the New York State Assembly districts. I write to oppose the changes to the 88th Assembly District included in the Commission's draft map published on December 1, 2022.

I have represented the 88th Assembly District for a little over two decades. In recent redistricting cycles, the boundaries of the district have shifted, but the overall location and makeup of the district has stayed the same. The district is geographically compact and contains all or part of several municipalities in southern Westchester County.

In recent decades, the 88th District has had a population approximately evenly divided between part of two small cities and all or part of several towns. The two cities are New Rochelle and White Plains, and the towns entirely in the district are Eastchester, Pelham, and Scarsdale, including the villages of Bronxville, Tuckahoe, Pelham, Pelham Manor, and Scarsdale. As of the 2022 elections, the 88th District also includes part of the Town of Greenburgh, specifically the area coextensive with the Edgemont Union Free School District. The district's population breakdown, evenly divided between towns and small cities, has worked well in my experience. New York State has different laws that govern different types of municipalities, and by having an even division within the district, it ensures that the Assembly Member representing the district will understand the different communities, their needs, and the State laws that govern them.

In the IRC's draft Assembly map, part of the City of Yonkers is placed in Assembly District 88. While this addition does not represent a significant part of Yonkers or of the 88th District, it would be a significant change for the legislator who would represent the district. Unlike the other two cities that are already in the district, Yonkers is a "Big Five" city. The laws that govern the City of Yonkers are different than those that govern smaller cities, particularly when it comes to the Yonkers City School District. The six Union Free School Districts in the current 88th District (Bronxville, Eastchester, Edgemont, Pelham, Scarsdale, and Tuckahoe) and the two City School Districts (New Rochelle and White Plains) have elected school boards, whereas the Yonkers City School District operates as a branch of the local government with no elected school board or taxing authority.

Advocating for local school districts is one of the most important roles of State legislators in New York. Adding a small part of Yonkers, the third largest city in the State, to the 88th District would create a situation where the legislator representing this district would need to balance representing several towns, two small cities, and part of a big city. It would be unfair to the residents of these communities to have a legislator stretched across so many different types of municipalities with different structures and laws.

In altering the boundaries of the 88th Assembly District, the Commission's draft map divides neighborhoods in the cities of New Rochelle, White Plains, and Yonkers. In New Rochelle, the West End neighborhood, which is currently contained in the 91st District, would be split down the middle by the 88th and the 91st. In White Plains, the Highlands and Prospect Park neighborhoods, currently in the 88th District, would be divided between the 88th and the 93rd. And in Yonkers, Beech Hill and Colonial Heights, which are currently in the 92nd District, would have portions split off into the 88th District. Each of these neighborhoods is a community of interest.

When municipalities must be divided to maintain equal population across districts, it is important to keep defined neighborhoods whole where possible. This helps guarantee that residents know who their legislators are and allows community members to organize with their neighbors. In past cycles, the block-on-border requirement unfairly hurt residents of cities throughout the state by requiring some neighborhoods to be divided to ensure zero population deviation. The voters of New York State removed that requirement for Assembly Districts from the State Constitution, and accordingly, the Commission should avoid unnecessarily dividing city neighborhoods.

The Commission must also remedy errors where a finite number of Census blocks are placed in a different district than the rest of their municipalities. These errors occur throughout the IRC's draft map. In certain instances, the Voting District (VTD) boundaries maintained by the Census Bureau do not accurately align with municipal boundaries. This is a problem in several counties, including Westchester County, and is likely the cause of these errors.

For example, in the IRC's draft map, the Town of Harrison, with a population of 28,221, is divided between two districts, with 28,201 residents in the 93rd District and 20 residents in the 91st District. Similarly, the Town of Mamaroneck, with a population of 31,765, is divided between the 88th and the 91st District, with 31,735 residents in the 91st and 30 residents in the 88th. The Town of North Castle, with a population of 12,411, is also divided between two districts, with 12,362 residents in the 93rd District and 49 residents in the 95th District. And the Town of New Castle, with a population of 18,314, is divided between the 92nd and 95th District, with 18,311 residents in the 95th District and 3 residents in the 92nd District.

While these appear to be minor technical errors, if they are not remedied in later drafts, they could create serious problems for representation and administration of elections.

I appreciate the challenging job you have before you. Finding a way to balance population requirements with the necessity of uniting communities of interest is not an easy task. For that reason, I hope you will understand the work that a legislator must do to balance the needs of the different communities they represent. Communities should not be haphazardly placed in one district or another but should instead be united in a way that furthers their representation in Albany.

Thank you for taking the time to read my comments about the 88th Assembly District and for listening to the comments from New Yorkers throughout this process. We all appreciate the work of the Independent Redistricting Commission and your commitment to guaranteeing fair representation for all New Yorkers.

Sincerely,

A handwritten signature in black ink that reads "Amy Paulin". The signature is fluid and cursive, with the first name "Amy" written in a larger, more prominent script than the last name "Paulin".

Amy Paulin
Member of Assembly
88th District