NYSCEF DOC. NO. 322

1

Submission Brief

Wilson Prieve

Summary:

A brief reviewing my submissions for New York's remedial State Senate and Congressional maps in the Harkenrider v. Hochul Case

Key Links:

State Senate: <u>https://davesredistricting.org/join/2890d0e8-239b-4fa2-8bdc-6f7d981e41d1</u>

Congressional: <u>https://davesredistricting.org/join/91607142-d7fc-4f27-ae7d-38e0e8d786bb</u>

About me:

I am a 16 year old High School student majoring in mathematics at Brooklyn Technical High School. I am currently doing a research paper on the national implications of partisan gerrymandering and trying to create metrics to evaluate partisan gerrymandering. Alongside my love of mathematics, I have a great love for the State of New York and hope that these submissions will help to create fair maps that represent the state well.

As a student with genuine interests, I hope to offer a fresh perspective on this matter. Many of the submissions will likely be from lawyers representing people who have political ambitions in their line drawing. In these maps, I really do attempt to set aside any biases I may have and focus on my knowledge of the state.

I can be reached via email at <u>wprieve@gmail.com</u> or <u>wilsonprieve@mac.com</u>.

State Senate Map:

I drew a State Senate map targeted at creating districts each with a defined community in mind to ensure everyone gets a voice. This meant looking at Municipality lines, natural borders such as rivers, and man-made borders such as highways. This map dramatically alters many districts from the old State Senate Map; many have no clear successor because the previous map was often very uncompact and malapportioned.

In New York City, a great effort was made to ensure that distinct minority groups got representation while also cleaning up the uncompact lines of the previous decades map that often violated the interest of these communities. Infact, my map has a total 24 minority-majority districts, each of which represents a distinct minority group. Furthermore, living in New York City for 15 years allowed me to use my own knowledge of the city to help guide my drawing of districts in this region.

When drawing this map, partisanship data was not used other than for post-drawing analysis. When you have 63 districts, relative political fairness should be achieved by drawing the districts based on the considerations listed above. A brief analysis suggests my map achieves relative partisan symmetry on several datasets. The map is also reactive, meaning there are many politically competitive seats that voted differently between recent elections.

Election	D Total Seats	R Total Seats	Seats Within a 10% Margin
Senator 2016	63	0	2
President 2016	43	20	13
A.G. 2018	46	17	14
Governor 2018	43	20	13
Senator 2018	55	8	12
President 2020	46	17	13

Below is a table showing the partisan breakdown in recent statewide elections:

Anyone can feel free to reach out to me about any questions they may have about individual districts and why certain decisions were made.

NYSCEF DOC. NO. 322

3

Congressional Districts:

To draw a congressional map, I used many of the same principles used in drawing the State Senate map, however, this time with an emphasis placed on keeping the cores of existing districts intact to the extent possible.

All current minority districts are maintained or strengthened, and a new 10th district is created in South Brooklyn that gives growing Asian communities in Bensonhurst and Sunset Park, as well as the Hasidic Jewish community, a voice they've long been denied. This district would be highly competitive politically. This new district forces some shifts in nearby districts, namely NY-07, NY-08, NY-09, NY-11, and NY-12. However, these shifts are largely for the better and necessary to make way for this new district, and actually clean up a lot of the squiggle in Brooklyn. NY-12 for instance becomes entirely Manhattan based and takes in heavily white communities in the immediate "downtown" of the city.

Due to being at the orthocenter of underpopulated districts, NY-22 is cut upstate, causing renumbering of districts 22-27. Furthermore, Neighboring districts had some significant shifts to account for this loss, but an effort was made to keep their cores intact and continue to represent a clear community.

This proposal carries over many of the competitive districts from the previous map, and creates a new competitive NY-23 upstate based around college towns like Ithaca and Binghamton, as well as the NY-10 already mentioned. This is important because expert analysis suggests that we're seeing a significant reduction in competitive seats nationally, so New York's map can help offset that shift.

Given the least changed nature of the map which most seem to agree is relatively fair from a partisan perspective, this map should also be considered fair. Seats on both sides are made more competitive and looking at communities of interests was what primarily shaped the districts. Given that New York is so lopsided politically, it can be hard to evaluate how many seats each party "should" win, especially with a relatively small number of seats.

Anyone can feel free to reach out to me about any questions they may have about individual districts and why certain decisions were made.



