

United States District Court
Western District of Wisconsin
Robert W. Kastenmeier Courthouse
120 N. Henry Street, Rm. 540
Madison, Wisconsin 53703

Chambers of
Barbara B. Crabb
District Judge

Telephone
608-264-5447

February 7, 2017

Honorable Kenneth F. Ripple
United States Court of Appeals
Robert A. Grant Federal Building and
United States Courthouse
204 South Main Street, Room 208
South Bend, IN 46601

Honorable William C. Griesbach
Chief Judge
United States District Court
Jefferson Court Building
125 South Jefferson Street, Room 203
Green Bay, WI 54301

All Counsel of Record

Re: Whitford v. Nichol; 15-cv-421-bbc

Attached is a letter I received in this case, which I will add to the docket so that everyone is aware of it.

Very truly yours,



Barbara B. Crabb
District Judge

BBC:skv



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PETER OPPENEER
CLERK US DIST COURT
WD OF WI

January 22, 2017

The Honorable Barbara Crabb
United States District Court
Western District of Wisconsin
120 North Henry Street, Room 320
Madison, Wisconsin 53703

Dear Judge Crabb,

I was pleased to read in the New York Times, an article describing actions by the US District Court for WI taken against gerrymandering the maps for congressional districts. An extreme and similar circumstance exists in our area of southeastern PA.

Our thought is that if additional constraints were placed on the drawing of the district maps, the probability of gerrymandering abuse could be greatly reduced.

As an improvement to the present procedures, this project proposal suggests the addition of two criteria to the already existent dictate for the equality of population within the voting districts. The first is a shape factor to set limits on the relative geographic consolidation of any proposed district and the second measures the degree to which the represented population is centered with the district.

The first criterion is intended to prevent spider web shape districts that are tailored to political advantage from being accepted. This can be accomplished by limiting the ratio of the perimeter with respect to the contained area of a district. Highly irregular shapes have much greater lengths of boundary per enclosed area than more consolidated districts.

The second constraint would be a district positioning factor that describes how centered the represented population is within a district. Its intention is to limit the abusive practice of "divide and dilute" or "pack and crack" by which opponent population concentrations are subdivided and blended into larger areas of friendly political support. A value associated with the distances of the population from the geographic center of a proposed district can describe the distribution of the population. A ratio formula can produce a number less than one that describes a population that is concentrated toward the center of the district whereas larger values indicate significant population concentrations on the periphery.

Measurement values as they apply to any existing or proposed district for each of these criteria are easily generated by currently, commonly used Geographical Information System programs used by virtually all state governments and the federal authority. The use of these values could provide the judiciary with metrics for monitoring; evaluating, and supporting decisions taken that address this important challenge to fairness of representation.



If there is an interest in more information regarding this approach, I would be pleased to provide addition elaboration or reference the West Chester University Department of Geography and Planning that is responsible for the GIS applications, and is considering involvement in the development of this project.

I can be contracted by mail at:

Eugene London
206 Dutt's Mill East
West Chester, PA 19382

email: ee2jl@comcast.net

cell phone at (484) 883-4519

Sincerely,
Eugene J London

A handwritten signature in blue ink that reads "Eugene London". The signature is written in a cursive style with a long, sweeping underline that extends to the right.