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May 10, 2022

Honorable Patrick F. McAllister
New York State Supreme Court, County of Steuben
3 East Pulteney Square
Bath, New York 14810

RE: Proposed Congressional District Plan Following the May 6, 2022 Court Hearing

Dear Justice McAllister:

On April 29, 2022, I submitted a proposed corrective plan for congressional districts 1, 2, 3, 4, 11 and 12 in response to submissions from Petitioners, the Empire Center and Wai Chi Chan. Following the public hearing held in your courtroom on Friday, May 6, 2022, I am submitting the attached proposed compromise plan that incorporates various aspects of the proffered testimony and the maps submitted to the court by the Parties and other interested individuals.

In this proposed compromise plan, Congressional Districts 1, 2, 4 and 11 are identical to the proposed corrective plan I submitted on April 29, 2022. Congressional District 3 extends northward into Bronx and Westchester counties, but it shifts the district away from Queens County to create necessary space for Congressional Districts 5, 6 and 14. While this five-county design for Congressional District 3 is less than desirable, shifting Congressional District 3 away from Queens County allows more room for the Queens County-based districts and Congressional District 16, without harming the integrity of the communities across the rest of Long Island.

Congressional Districts 3, 6, 13, 14, 15 and 16 are similar to the proposed Unity Map and Congressional Districts 6, 13, 14, 15 and 16 are also similar to the proposal from Common Cause. Unfortunately, the Common Cause Map does not effectively preserve the communities in Nassau County.

As compared to my April 29, 2022 submission, Congressional District 12 loses Sunset Park, Brooklyn and pushes the district into Kensington, Brooklyn. These changes were necessary to unite the Chinese communities in Sunset Park and the Chinatown neighborhood in the Lower East Side of Manhattan within Congressional District 7, while also allowing more space for Congressional Districts 8 and 9. Unlike Petitioners' proposed map, this design for a district connecting the Orthodox Jewish communities in Brooklyn and Queens does not enter Nassau County. As compared to the 2012 map and the 2022 enacted plan that was found to be unconstitutional, this is a better approach to consolidate these predominately Orthodox Jewish neighborhoods and it eliminates the linking of the Upper West Side of Manhattan to Borough Park, Brooklyn.

Beyond connecting the Chinese communities in Sunset Park and Chinatown, Congressional District 7 also wraps around Congressional Districts 8 and 9 to unify Spanish-speaking communities in the Lower East Side of Manhattan and the East Village with those in Kings and Queens counties.

Congressional District 8 includes all of the Yiddish-speaking community in North Brooklyn, as defined in the filing from the United Jewish Organizations of Williamsburg and North Brooklyn.

Congressional District 10 is now completely contained in Manhattan. It includes the Upper East Side and Upper West Side south to roughly 14th Street. Under the 2012 map, Manhattan is divided into four districts. This plan reduces the number of districts in the county to three. Moreover, the 2012 map does not have any districts wholly-contained within Manhattan.

Congressional Districts 13 and 15 mirror Petitioners' proposed map and largely preserve the existing districts, while Congressional District 16 more effectively keeps northern Bronx County and the City of Mt. Vernon in Westchester County together than in Petitioners' proposal.

This plan improves upon the plans submitted by both Petitioners and Respondents by keeping Putnam County whole and, similarly, it reduces the number of Upstate county splits in Petitioners' map (Broome, Montgomery, Oswego and Rensselaer counties).

I respectfully request that the court and the court-appointed special master consider this submission as you complete this process.

Sincerely,

Mary Schmidt-Roth
Mary Schmidt Roth