

<p>COLORADO SUPREME COURT 2 East 14th Avenue Denver, CO 80203</p>	
<p>Original Proceeding Pursuant to §§ 2-1-106(3)(b), C.R.S.</p>	
<p>In re: Proposed Changes to Borders Between Congressional Districts</p>	
<p><i>Attorneys for the Colorado Secretary of State</i> PHILIP J. WEISER, Attorney General LEEANN MORRILL, #38742 First Assistant Attorney General* PETER G. BAUMANN, #51620 Assistant Attorney General* Ralph L. Carr Colorado Judicial Center 1300 Broadway, 6th Floor Denver, CO 80203 Telephone: (720) 508-6152 FAX: (720) 508-6041 Email: leeann.morrill@coag.gov peter.baumann@coag.gov *Counsel of Record</p>	<p>▲ COURT USE ONLY ▲</p> <p>Case No.</p>
<p>THE SECRETARY OF STATE'S PETITION TO ADJUST BORDERS BETWEEN CONGRESSIONAL DISTRICTS</p>	

CERTIFICATE OF COMPLIANCE

Arising under a *sui generis* statutory provision, this Petition does not fall within the paradigm of C.A.R. 28. Specifically, because the relevant statute does not limit the number of redistricting adjustments the Secretary may propose, the brief should not be subject to the word limits established in C.A.R. 28(g). Nonetheless, I hereby certify that this brief complies with the formatting requirements set forth in C.A.R. 28

I also hereby certify that this brief contains 5,825 words.

Notwithstanding the original nature of this action, I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 28 or 28.1 and C.A.R. 32.

s/ Peter G. Baumann

PETER G. BAUMANN, #51620

Assistant Attorney General

TABLE OF CONTENTS

ISSUES PRESENTED FOR REVIEW	3
JURISDICTION	4
INTRODUCTION.....	4
LEGAL STANDARD	7
I. Statutory Attachments and Detachments.....	7
II. Secrecy in Voting.....	11
ARGUMENT	12
I. Adjustments pursuant to § 2-1-106(3)(b).....	12
A. Adams County - 1	13
1. Proposal (Exhibit A – Adams 2).....	13
2. Analysis	16
B. Adams County – 2	16
1. Proposal (Exhibit B – Adams 9).....	16
2. Analysis	17
C. Arapahoe County.....	18
1. Proposal (Exhibit C – Arapahoe 2)	18
2. Analysis	19
D. Eagle County	20
1. Proposal (Exhibit D – Eagle 1)	20
2. Analysis	21
E. Weld County - 1	23

1. Proposal (Exhibit E – Weld 1).....	23
2. Analysis	24
F. Weld County - 2	25
1. Proposal (Exhibit F – Weld 2).....	25
2. Analysis	26
G. Weld County - 3	26
1. Proposal (Exhibit G – Weld 4)	26
2. Analysis	27
H. Weld County - 4	27
1. Proposal (Exhibit H – Weld 5)	27
2. Analysis	28
I. Weld County - 5	29
1. Proposal (Exhibit I – Weld 6).....	29
2. Analysis	30
J. Weld County - 6	30
1. Proposal (Exhibit J – Weld 8)	30
2. Analysis	31
II. Adjustments to maintain ballot secrecy.	33
III. Overall impact of the adjustments.	38
CONCLUSION	39

TABLE OF AUTHORITIES

CASES

<i>Citizen Ctr. v. Gessler</i> , 770 F.3d 900 (10th Cir. 2014)	33
<i>In re Colo. Indep. Cong. Redistricting Comm’n</i> , 2021 CO 73	passim
<i>In re Proposed Changes to Borders Between State Senate and House Districts Due to Mapping Errors</i> , 2012SA251 (2012)	7
<i>Jones v. Samora</i> , 2014 CO 4	33
<i>Karcher v. Daggett</i> , 462 U.S. 725 (1983)	10, 11
<i>Kirkpatrick v. Preisler</i> , 394 U.S. 526 (1969)	10
<i>Marks v. Koch</i> , 284 P.3d 118 (Colo. App. 2011)	12, 33
<i>Moreno et al. v. Gessler</i> , No. 11CV3461 (Denver Dist. Ct. Oct. 9, 2012) ..	6
<i>Moreno et al. v. Gessler</i> , No. 11CV3461, (Denver Dist. Ct. Sept. 24, 2012)	6
<i>Tennant v. Jefferson Cty. Comm’n</i> , 567 U.S. 758 (2012)	passim

CONSTITUTIONS

Colo. Const. art. V, § 44.3(1)(a)	9
Colo. Const. art. VII, § 8	passim

STATUTES

§ 2-1-106(1)–(3), C.R.S. ((2021)	5
§ 2-1-106(3)(a)(I)–(V), C.R.S. (2021)	9

§ 2-1-106(3)(a)(II), C.R.S. (2021)	passim
§ 2-1-106(3)(a), C.R.S. (2021)	3, 8, 39
§ 2-1-106, C.R.S. (2021)	5, 6, 7
2020 Colo. Sess. Laws Ch. 272.....	7

ISSUES PRESENTED FOR REVIEW

1) Whether the adjustments to congressional borders requested by county clerks and proposed by the Secretary satisfy the criteria established in § 2-1-106(3)(a) and should be approved.

2) Whether the adjustment to the border between the second and seventh congressional districts proposed by Boulder County should be approved to protect secrecy in voting.

Secretary of State Jena Griswold hereby files this petition under § 2-1-106(3)(b) to adjust certain boundaries in the congressional districts map finally approved by this Court on November 1, 2021. As explained below, these adjustments are necessary to address residential parcels that are split between multiple districts, and, in one instance, to ensure ballot secrecy by altering a precinct containing only two registered voters.

JURISDICTION

This Court has jurisdiction to review proposed adjustments to final congressional maps under § 2-1-106(3)(b) and Colo. Const. art. VII, § 8.

INTRODUCTION

In November 2021, this Court approved the redistricting plan submitted by the Colorado Independent Congressional Redistricting Commission. *See In re Colo. Indep. Cong. Redistricting Comm’n*, 2021 CO 73, ¶ 1. That plan established eight congressional districts. Based on the 2020 census, districts 1, 2, 3, 5, 7, and 8 contain total populations

of 721,714, and districts 4 and 6 contain total populations of 721,715.

Id. ¶¶ 18–25.

Once the map was approved, the redistricting baton passed to the Secretary and Colorado’s 64 county clerks. Together, those election officials began the process of implementing the maps for use in the 2022 congressional primary and general elections.

In December 2021, the Secretary asked counties to identify any potential adjustments to the boundaries under § 2-1-106. Specifically, the Secretary asked counties to identify: (1) areas of the state omitted from the map, (2) areas of the state included in two or more districts under the map, and (3) places where a border between two congressional districts “divides a residential parcel between the two districts and the clerk and recorder wishes to have the border moved[.]” § 2-1-106(1)–(3).

No county identified an area subject to the first or second criteria. Several counties, however, identified district boundaries that divided residential parcels. And one county identified a precinct containing only

two registered voters for which there is no practical solution available to ensure ballot secrecy, and that would necessarily result in various officials in two counties knowing precisely the actual votes cast by those voters and creating ambiguity in the Secretary's statewide abstract of votes cast. The Secretary reviewed those requests, and now proposes adjusting certain congressional borders as authorized by § 2-1-106 and Colo. Const. art. VII, § 8.

This process, in substantially similar form, occurred after the redistricting process following the 2010 census. In that cycle, the adjustments were proposed to the district court tasked with overseeing the development of the map. *See* Forthwith Mot. to Realign Certain Cong. District Boundaries to Correspond with Parcel and County Boundary Lines, *Moreno et al. v. Gessler*, No. 11CV3461, (Denver Dist. Ct. Sept. 24, 2012). That court approved the proposals. Order, *Moreno et al. v. Gessler*, No. 11CV3461 (Denver Dist. Ct. Oct. 9, 2012).¹

¹ An even more similar process occurred with regards to adjustments to state legislative boundaries. *See generally In re Proposed Changes to Borders Between State Senate and House Districts Due to Mapping*

LEGAL STANDARD

I. Statutory Attachments and Detachments

In 2018, Colorado voters overhauled Colorado’s congressional redistricting process through the adoption of Amendment Y. *In re Colo. Indep. Cong. Redistricting Comm’n*, 2021 CO 73, ¶ 3. Following the adoption of Amendment Y, the General Assembly enacted implementing legislation, SB 20-186, including the language now codified at § 2-1-106. 2020 Colo. Sess. Laws Ch. 272, 1322–24.

Section 2-1-106 furthers the functional purposes of Amendment Y by allowing county clerks and the Secretary to suggest minor adjustments to the maps. The statute permits such adjustments if: (1) “any area of the state is omitted” from the map approved by this Court; (2) “any area of the state is included in two or more congressional

Errors, 2012SA251 (2012). There, after the Secretary proposed a series of adjustments to state legislative maps under a predecessor to § 2-2-507 (a parallel statute to § 2-1-106 that addresses legislative, rather than congressional maps), the Court solicited responses to the Petition and ultimately approved the maps in a per curiam order. A copy of that Order is attached as Exhibit 1.

districts” in the map approved by this Court; or (3) the map approved by this Court “divides a residential parcel” between two districts.

All but one adjustment sought by this Petition arises under the third criteria. With regards to divided residential parcels, the statute provides a series of permissive steps. First, if a county clerk discovers a split residential parcel *and* wishes that the border be adjusted, the clerk “shall submit to the secretary of state documentation, satisfactory to the secretary of state, evidencing such a division.” § 2-1-106(3)(a). Next, *if* the secretary of state believes that the border should be moved, “the secretary of state shall propose moving the border between the two districts to a visible feature normally relied upon by the United States census bureau[.]” *Id.*

The statute further requires that any such proposal: (1) “not split a residential parcel”; (2) move “the remaining portion of the residential parcel into the least populated of the two districts”; (3) “not result in a violation of section 44.3(1)(a) of article V of the state constitution based upon the latest national census”; (4) minimize “the impact on the

affected community for purposes of establishing polling locations”; and (5) minimize “changes in distances from the redistricting plan approved by the Colorado supreme court.” § 2-1-106(3)(a)(I)–(V).

If the Secretary does propose moving a border pursuant to this section, she shall “describe any potential changes in populations of affected congressional districts . . . to the Colorado supreme court.” § 2-1-106(3)(b). If this Court determines that the proposals “satisfy the criteria established in subsection (3)(a) . . . , [it] may approve said assignments.” *Id.* If this Court finds that any proposal does not satisfy the statutory standard, it “shall deny the proposed assignment.” *Id.*

The statute’s invocation of article V, section 44.3(1)(a) requires the Secretary’s proposals to make a “good-faith effort to achieve precise mathematical population equality between districts, justifying each variance, no matter how small, as required by the constitution of the United States.” Colo. Const. art. V, § 44.3(1)(a). The proposals must also ensure that districts are “composed of contiguous geographic areas.” *Id.*

As this Court explained in adopting the map, this requirement derives from “Article 1, Section 2, Clause 3 of the U.S. Constitution, which requires congressional representatives to be apportioned ‘according to their respective Numbers,’ and has been interpreted by the U.S. Supreme Court to require population equality between congressional districts ‘as nearly as is practicable.’” *In re Colo. Indep. Cong. Redistricting Comm’n*, 2021 CO 73, ¶ 44 (quoting *Karcher v. Daggett*, 462 U.S. 725, 730 (1983)).

“[T]he ‘as nearly as practicable’ standard requires that the State make a good-faith effort to achieve precise mathematical equality.” *Kirkpatrick v. Preisler*, 394 U.S. 526, 530–31 (1969). “Unless population variances among congressional districts are shown to have resulted despite such effort, the State must justify each variance, no matter how small.” *Id.* at 531. In other words, the U.S. Constitution “permits only the limited population variances which are unavoidable despite a good-faith effort to achieve absolute equality, or for which justification is shown.” *Id.*

In *Karcher*, the U.S. Supreme Court identified some of the state interests that might justify deviating from precise mathematical equality, including “making districts compact, respecting municipal boundaries, preserving the cores of prior districts, and avoiding contests between incumbent Representatives.” 462 U.S. at 740. But it made clear that this list was non-exhaustive. *Id.* So long “as the criteria are nondiscriminatory,” *id.*, “the showing required to justify population deviations is flexible, depending on the size of the deviations, the importance of the State’s interests, the consistency with which the plan as a whole reflects those interests, and the availability of alternatives that might substantially vindicate those interests yet approximate population equality more closely.” *Id.* at 741.

II. Secrecy in Voting

The Colorado constitution explicitly prohibits ballots from being “marked in any way whereby the ballot can be identified as the ballot of the person casting it,” and bars “election officers” from “disclos[ing] how any elector shall have voted.” Colo. Const. art. VII, § 8. “The plain and

commonsense meaning of this clause, by virtue of the term ‘person,’ clearly indicates that the identity of an individual voter, and any markings on the ballot that could identify that voter, are to be kept secret.” *Marks v. Koch*, 284 P.3d 118, 122 (Colo. App. 2011).

ARGUMENT

I. Adjustments pursuant to § 2-1-106(3)(b).

Having reviewed submissions from counties, the Secretary proposes adjustments pursuant to § 2-1-106(3)(b) to congressional boundaries in four Colorado counties: (1) Adams, (2) Arapahoe, (3) Eagle, and (4) Weld. Each of the proposed adjustments is described below, and is detailed in the attached Exhibits. Although the Secretary has attempted in good faith to describe the relevant adjustments below, it is the maps, not the descriptions, that reflect the counties’ requests and the Secretary’s proposal. In the event of a conflict between the descriptions below and the maps attached as Exhibits, the maps reflect the proposed adjustment.

In each instance, the proposal reflects a request made to the Secretary by the relevant county clerk. Having discovered “that a border between two congressional districts divides a residential parcel between the two districts,” the clerk submitted the proposed adjustments to the Secretary. Believing that the following adjustments should be made, the Secretary now submits each to this Court for its review and respectfully requests that they be approved.

A. Adams County - 1

1. Proposal (Exhibit A – Adams 2)

The current congressional district (“CD”) 7-8 and house district (“HD”) 33-29 boundary follows the boundaries between census block 080010600012000 (pop./adj. pop. 47) which splits residential parcel IDs 0157309001001, 0157309001002, 0157309001003, and 0157309001004 on the north, and parcel IDs 0157309002009 and 0157309002008 on the east. The districts’ boundaries that run through parcels 0157309001001, 0157309001002, 0157309001003, and 0157309001004 should be adjusted to align to the Northwest side of the Adams County

line that borders Broomfield County. The districts' boundaries that run through parcels 0157309002009 and 0157309002008 should be adjusted east to align to Huron St along the Adams County and Broomfield County border. The proposed boundary adjustment moves the portion of block 2000 from CD7 to CD8 and HD33 to HD29. The proposed adjustment will not adjust the 2020 census population of CD7, CD8, HD33, or HD29.

The current CD7-8 and HD33-29 boundary follows the eastern boundary of census block 080010600012009 (pop./adj. pop. 30), which splits residential parcel ID 0157309408020 on the east. The districts' boundaries that run through parcels 0157309408020 should be adjusted to align to the East side of the Adams County line that borders Broomfield County. The proposed boundary adjustment moves the portion of block 2009 from CD7 to CD8 and HD33 to HD29. The proposed adjustment will not adjust the 2020 census population of CD7, CD8, HD33, or HD29.

The current CD7-8 and HD33-29 boundary follows the boundaries between eastern boundary of census block 080010600012008 (pop./adj. pop. 25) which splits residential parcel IDs 0157309407021, 0157309409022, 0157309409024, 0157309409023 and 0157309409026 on the east. The districts' boundaries that run through parcels 0157309407021, 0157309409022, 0157309409024, 0157309409023 and 0157309409026 should be adjusted to align to the East side of the Adams County line that borders Broomfield County. The proposed boundary adjustment moves the portion of block 2008 from CD7 to CD8 and HD33 to HD29. The proposed adjustment will not adjust the 2020 census population of CD7, CD8, HD33, or HD29.

The current CD7-8 and HD33-29 boundary follows the eastern boundary of census block 080010600012007 (pop. 80) which splits residential parcel IDs 0157316004050, 0157316004010, 0157316004016, 0157316004005, and 0157316101005. The districts' boundaries that run through parcels 0157316004050, 0157316004010, 0157316004016, 0157316004005, and 0157316101005 should be adjusted east to align to

Huron St along the Adams County and Broomfield County border. The proposed boundary adjustment moves the portion of block 2008 from CD7 to CD8 and HD33 to HD29. The proposed adjustment will not adjust the 2020 census population of CD7, CD8, HD33, or HD29.

2. Analysis

The proposed adjustments to the border between the seventh and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with the Adams County – City and County of Broomfield boundary, and would not cause any change to the 2020 census populations of the districts, because the habitable dwellings on the split residential parcels are situated within the districts in which the occupants were originally counted in the 2020 census.

B. Adams County – 2

1. Proposal (Exhibit B – Adams 9)

The current CD7-8, HD24-35, SD19-21 boundary follows the boundaries between census blocks 080010096081004 (pop./adj. pop. 346) and 080010096081005 (pop./adj. pop. 0) on the north, and the

boundaries between census blocks 080010096081005 (pop./adj. pop. 0) and 080010096072000 (pop. 90) on the east. The finally approved boundary splits residential parcel IDs 0182506318036, 0182506318039, 0182506318040, and 0182506300041 on the north, and 0182506318048 on the east. The districts' boundaries should be adjusted to run along the northern boundaries of parcels 0182506318036, 0182506318039, 0182506318040, 0182506300041, 0182506318108, 0182506318109, 0182506318044, 0182506318045, and 0182506318046, and the eastern boundary of parcel 0182506318048. The proposed boundary adjustment moves the southwestern portion of unpopulated block 1005 and the western portion of block 2000, from CD8 to CD7, HD35 to HD24, and SD21 to SD19. The proposed adjustment will not adjust the 2020 census population of CD8, CD7, HD25, HD24, SD21 and SD 19.

2. Analysis

The proposed adjustments to the border between the seventh and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with the parcel boundaries of the

residential parcels currently split by the border, and would not cause any change to the 2020 census populations of the districts.

C. Arapahoe County

1. Proposal (Exhibit C – Arapahoe 2)

The current CD4-6 boundary runs along the eastern boundary of census block 080050844001009 (pop. 34), which splits 15 separate residential parcels (Arapahoe County parcel IDs 2073-02-2-03-002, 2073-02-2-03-003, 2073-02-2-03-004, 2073-02-2-03-005, 2073-02-2-03-006, 2073-02-2-03-007, 2073-02-2-03-010, 2073-02-2-03-011, 2073-02-2-03-012, 2073-02-2-03-013, 2073-02-2-03-015, 2073-02-2-03-016, 2073-02-2-03-017, 2073-02-2-03-018, and 2073-02-2-03-019). Moving the district boundary to the western boundary of census block 080050844001009 would align the district boundary with the backlot lines of the split residential parcels. This proposed boundary adjustment entails detaching census block 080050844001009 from CD6 and assigning the same block to CD4. The proposed boundary adjustment will increase the 2020 census population of CD4 by 34 from 721,715 to 721,749, and

decrease the 2020 census population of CD6 by 34, from 721,715 to 721,681.

2. Analysis

The proposed adjustments to the border between the fourth and sixth congressional districts comply with the statutory standard. The proposal would align the boundary with the parcel boundaries of the residential parcels currently split by the border. And because the fourth and sixth congressional districts contain identical populations under the current map, the requirement to move the remaining portion of the split residential parcels into the least populated district does not apply. *See* § 2-1-106(3)(a)(II).

The proposed assignment would increase the 2020 census population of CD4 by 34 to 721,749, or 100.005% of the ideal population of 721,714. The proposed assignment would decrease the 2020 census population of CD6 by 34 to 721,681, or 99.995% of the ideal population of 721,714. Together, the deviation between the new most populous district (CD4) and the new least populous district would be 0.01%. This

minor deviation falls within an acceptable level of deviation, so long as it is justified. *See Tennant v. Jefferson Cty. Comm’n*, 567 U.S. 758, 759 (2012) (per curiam) (holding that state interests justified map with a population variance of 0.79%).

Here, the proposal adjusts the CD4-6 boundary so that it runs along the western boundary of census block 080050844001009, which happens to align with the western lot lines of the split residential parcels. The state’s interest in keeping residential parcels intact justifies the de minimus deviation.

D. Eagle County

1. Proposal (Exhibit D – Eagle 1)

The current CD2-3 boundary aligns with census feature “Brush Crk,” and splits eleven residential parcels with homes directly to the west of Brush Creek Road (Parcel ID Nos. 219512100002, 219501400012, 219501401001, 219501100009, 219501200008, 219501202001, 219501100006, 219501100004, 219501201001, 219501100001, and 210936301001). The proposed boundary adjustment

moves the boundary east by approximately 600 ft to Brush Creek Rd., thereby keeping these homes within CD3 and in the same district as other homes along Brush Creek Rd and to the west. The adjustment effectively detaches census block 080370004053042 in its entirety from CD2, and assigns it to CD3. This adjustment will decrease the 2020 census population of CD2 by 16, from 721,714 to 721,698, and increase the 2020 census population of CD3 by 16, from 721,714 to 721,730.

2. Analysis

The proposed adjustments to the border between the second and third congressional districts comply with the statutory standard. The proposal would align the boundary with the parcel boundaries of the residential parcels currently split by the border. And because the second and third congressional districts contain identical populations under the current map, the requirement to move the remaining portion of the split residential parcels into the least populated district does not apply. *See* § 2-1-106(3)(a)(II).

The proposed assignment would decrease the 2020 census population of CD2 by 16 to 721,698, or 99.998% of the ideal population of 721,714. The proposed assignment would increase the 2020 census population of CD3 by 16 to 721,730, or 100.002% of the ideal population of 721,714. Together, the deviation between the new most populous district (CD4) and the new least populous district would be 0.004%. This minor deviation falls within an acceptable level of deviation, so long as it is justified. *See Tennant*, 567 U.S. at 759.²

Here, the proposal adjusts the CD2-CD3 boundary so that it aligns with the eastern instead of the western boundary of census block 080370004053042, which aligns with the eastern boundaries of the affected residential parcels, instead of a creek bisecting several adjacent residential parcels. The state's interest in keeping residential parcels intact justifies the de minimus deviation.

² Because the population variance caused by this proposal is less than the population variance caused by the proposal in Part I.C, *supra*, this analysis is relevant only if the Court decides not to approve the proposal submitted by Arapahoe County.

E. Weld County - 1

1. Proposal (Exhibit E – Weld 1)

The current CD4-8 boundary follows the boundaries between census blocks 16003051 (pop. 17) and 25025015 (pop. 0), which runs along census feature Latham Ditch and splits residential parcel IDs 096532300022, 105105200014, 105105200031, 1051064000020 and 105107000011. The district boundary should be adjusted to align with County Road 50 from its intersection with US34 southeast of parcel 096532300022, then proceed west along Weld County Road (WCR) 50 until it intersects WCR 61, then south along WCR 60 until the point of intersection with the current CD4-8 boundary. The proposed boundary adjustment moves the portion of block 25025015 north of County Road 50 from CD2 to CD8, and all of block 16003051 from CD8 to CD4. The proposed adjustment will increase by 17 the 2020 census population of CD4 by 17, from 721,715 to 721,732, and decrease the 2020 census population of CD8 by 17, from 721,714 to 721,698.

2. Analysis

The proposed adjustments to the border between the fourth and eighth congressional districts comply with the spirit, but not the plain language, of the statutory standard. The proposal would align the boundary with residential parcel boundaries and two recognizable county roads. And although the proposal would move portions of the split parcels from the least populous district (CD4) to the more populous district (CD8), that decision is justified because County Roads 50 to the North and 61 to the West are the nearest, most appropriate boundaries that do not split residential parcels. *But see* § 2-1-106(3)(a) (II).

The proposed assignment would increase the 2020 census population of CD4 by 17 to 721,732, or 100.002% of the ideal population of 721,714. The proposed assignment would decrease the 2020 census population of CD3 by 16 to 721,698, or 99.998% of the ideal population of 721,714. Together, the deviation between the new most populous district (CD4) and the new least populous district would be 0.004%.

This minor deviation falls within an acceptable level of deviation, so long as it is justified. *See Tennant*, 567 U.S. at 759.³

Here, the proposal adjusts the CD4-CD8 boundary so that it runs atop the two nearest county roads, thereby avoiding bisecting several adjacent residential parcels. The state's interest in keeping residential parcels intact justifies the de minimus deviation.

F. Weld County - 2

1. Proposal (Exhibit F – Weld 2)

Beginning at Weld County Road 10, the current CD4-8 boundary follows a northeasterly path generally parallel to but west of westbound I-76, where the existing boundary splits residential parcel 1473100000014. The district boundary should be adjusted slightly to the east, to align with the midline of westbound I-76 until the point of intersection with Hickory Street, at which point the proposed boundary

³ Because the population variance caused by this proposal is less than the population variance caused by the proposal in Part I.C, *supra*, this analysis is relevant only if the Court decides not to approve the proposal submitted by Arapahoe County.

joins the existing boundary and proceeds due north. This boundary adjustment will not increase or decrease the 2020 census populations of CD4 or CD8 because the remaining portion of the split parcel currently stranded in CD8 is vacant land

2. Analysis

The proposed adjustments to the border between the fourth and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with an Interstate Highway, and would not cause any change to the 2020 census populations of the districts.

G. Weld County - 3

1. Proposal (Exhibit G – Weld 4)

The current CD2-CD8 boundary follows the boundary between census block 21061027 (pop. 53) and 21061029 (pop. 0), which splits residential parcel 120719000082 so that a sliver of the parcel is situated in CD8, with the majority of the parcel in CD2. The boundary should be adjusted slightly to the west to align with the western boundary of parcel 120719000082, so that the entire parcel is contained in CD2.

This boundary adjustment will not increase or decrease the 2020 census population of CD2 or CD8, because the portion of the parcel currently situated in CD8 is located in census block 21061029 which has a 2020 census population of 0.

2. Analysis

The proposed adjustments to the border between the second and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with the boundary of residential parcel 120719000082, of which only a sliver is currently in CD8, and would not cause any change to the 2020 census populations of the districts.

H. Weld County - 4

1. Proposal (Exhibit H – Weld 5)

The current CD2-CD8 boundary follows the boundary between census block 21051042 (pop. 0) on the west, and block 21051043 (pop. 5) on the east, and splits residential parcel 120728000008 so that the majority of the parcel is situated in CD2, with the remainder of the parcel in CD8. The boundary should be adjusted to follow the north

boundary and east boundary of census block 21051043, so that the entire parcel is contained in CD2. This boundary adjustment will increase the 2020 census population of CD2 by 5, from 712,714 to 721,719, and decrease the population of CD8 by 5, from 721,714 to 721,709.

2. Analysis

The proposed adjustments to the border between the second and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with residential parcel boundaries and two recognizable roads. And because the second and eighth congressional districts contain identical populations under the current map, the requirement to move the remaining portion of the split residential parcels into the least populated district does not apply. *See* § 2-1-106(3)(a)(II).

The proposed assignment would increase the 2020 census population of CD2 by 5 to 721,719, or 100.001% of the ideal population of 721,714. The proposed assignment would decrease the 2020 census

population of CD8 by 5 to 721,709, or 99.999% of the ideal population of 721,714. Together, the deviation between the new most populous district (CD4) and the new least populous district would be 0.002%. This minor deviation falls within an acceptable level of deviation, so long as it is justified. *See Tennant*, 567 U.S. at 759.⁴

Here, the proposal adjusts the CD2-CD8 boundary so that it runs atop census block boundaries that do not bisect residential parcels. The state's interest in keeping residential parcels intact justifies the de minimus deviation.

I. Weld County - 5

1. Proposal (Exhibit I – Weld 6)

The current CD2-CD8 and HD19-HD64 boundary follows the south boundary of census block 21051044 (pop./adj. pop. 12), which splits residential parcels 120733400010 and 120733300011 so that the

⁴ Because the population variance caused by this proposal is less than the population variance caused by the proposal in Part I.C, *supra*, this analysis is relevant only if the Court decides not to approve the proposal submitted by Arapahoe County.

parcels are primarily situated in CD2, with slivers of the parcels in CD8. The boundary should be adjusted to follow the south boundary of census block 21051084 (pop. 0), so that the entire parcels are contained in CD2. This boundary adjustment will not increase or decrease the population because there is zero population in census block 21051084.

2. Analysis

The proposed adjustments to the border between the second and eighth congressional districts comply with the statutory standard. The proposal would align the boundary with the boundary of residential parcel 120733400010, of which only a sliver is currently in CD8, and would not cause any change to the 2020 census populations of the districts.

J. Weld County - 6

1. Proposal (Exhibit J – Weld 8)

The current CD4-CD8 boundary follows the east boundary of census block 16003061 (pop. 16), which splits a residential parcel 105314000011. Further south, the current CD4-CD8 boundary follows the east boundary of census block 16003082 (pop. 14), which splits

residential parcels 105314000010, 105323100001, and 105323000013. Further south, the current CD4-8 boundary follows the northwestern boundary of census block 25025027 (pop. 0), which splits a residential parcel 105326200005.

The boundary should be adjusted to proceed west along County Road 46 in the north until the intersection with County Road 57, then south along County Road 57 until the adjusted boundary intersects with the existing district boundary under the finally approved plan. This proposed adjustment effectively detaches from CD8 and assigns to CD4 all of census blocks 16003061 (pop. 16) and 16003082 (pop. 14). This boundary adjustment will increase the census population of CD4 by 30, from 721,715 to 721,745, and decrease the census population of CD8 by 30, from 721,714 to 721,684.

2. Analysis

The proposed adjustments to the border between the fourth and eighth congressional districts comply with the spirit, but not the plain language, of the statutory standard. The proposal would align the

boundary with census block boundaries that follow residential parcel boundaries and two recognizable roads. And although the proposal would move portions of the split parcels from the least populous district (CD4) to the more populous district (CD8), that decision is justified because County Roads 46 to the North and 57 to the West are the nearest, most appropriate boundaries that do not split residential parcels. *But see* § 2-1-106(3)(a)(II).

The proposed assignment would increase the 2020 census population of CD4 by 30 to 721,745, or 100.004% of the ideal population of 721,714. The proposed assignment would decrease the 2020 census population of CD8 by 30 to 721,684, or 99.996% of the ideal population of 721,714. Together, the deviation between the new most populous district (CD4) and the new least populous district (CD8) would be 0.008%. This minor deviation falls within an acceptable level of deviation, so long as it is justified. *See Tennant*, 567 U.S. at 759.⁵

⁵ Because the population variance caused by this proposal is less than the population variance caused by the proposal in Part I.C, *supra*, this

Here, the proposal adjusts the CD4-CD8 boundary so that it runs atop recognizable county roads that do not bisect residential parcels. The state’s interest in keeping residential parcels intact justifies the de minimus deviation.

II. Adjustments to maintain ballot secrecy.

Section 8 of Article VII of the Colorado constitution “protects from public disclosure the identity of an individual voter and any content of the voter’s ballot that could identify the voter.” *In re Colo. Indep. Cong. Redistricting Comm’n*, 2021 CO 73, ¶ 88 (quotations omitted). The mere fact that a ballot could theoretically be traceable does not amount to a violation of the constitutional provision. *Jones v. Samora*, 2014 CO 4, ¶ 31. Instead, a violation only occurs when the contents of a voter’s ballot is actually disclosed in such a way that the voter is identifiable. *See Marks v. Koch*, 284 P.3d 118, 122 (Colo. App. 2011); *Citizen Ctr. v. Gessler*, 770 F.3d 900, 917 (10th Cir. 2014).

analysis is relevant only if the Court decides not to approve the proposal submitted by Arapahoe County.

In approving the plan submitted by the Congressional Commission, this court addressed ballot secrecy concerns raised by the Denver Clerk and Recorder. There, the Clerk noted that the overlapping congressional, state senatorial, and state representative boundaries within the City and County of Denver would require the creation of a precinct containing only 19 active registered voters. *In re Colo. Indep. Cong. Redistricting Comm’n*, 2021 CO 73, ¶ 87. According to the Clerk, “the creation of such a uniquely small precinct risks revealing voters’ identities.” *Id.*

Recognizing the “sensitive and serious nature of the Clerk’s objection,” the Court nonetheless concluded it could not invalidate the plan on that basis. *Id.* ¶ 89. Instead, it held that “this is a practical problem that requires a practical solution,” and called on the Clerk and the Secretary to “work together to fashion a remedy.” *Id.* ¶ 90.

In the case raised by Denver—and in several similar cases occurring in other counties—state and local election officials have done

just that. However, one case evades the type of “practical solution” called for by the Court.

Under the approved plan, Boulder County is almost entirely located within CD2. However, seven census blocks in Boulder County are assigned to CD7. *See* Exhibit K – Boulder 1. These seven census blocks contain a total population of 17, including just two active registered voters. Currently the CD7 area that is included in Boulder County is an agricultural area that is owned as open space by Boulder County and in part by the City of Louisville. This is open space that will not be developed. The population in these census blocks can be attributed to caretakers that farm or raise livestock on the land.

With regards to the issue raised previously by Denver—where overlapping boundaries necessitate the creation of a small precinct within a single county—a county can take practical steps to protect ballot secrecy. For example, the county may decide to report results related to a given contest from that precinct in conjunction with results from other precincts in which the same contest occurred.

But because election results are reported at the county level, and in general and presidential primary elections at the precinct level within each county, there is no way for Boulder County to aggregate the votes in the seven relevant census blocks with other ballots containing the CD7 contest. Moreover, as a general rule, the names and addresses of registered voters are a matter of public record under Colorado law. By merely reporting any results in CD7, Boulder County “election officers” will run an unacceptably high risk of “disclos[ing]” the ballot contents of the voters who cast ballots for that race. Colo. Const. art. VII, § 8.

The most acute risk would arise in circumstances when both of the active voters in this area select the same candidate in the CD7 congressional race. In that scenario, each of these voters would have their specific voting choices made public when Boulder’s election results

are revealed, because those results would show showing two votes in Boulder for a single candidate in the CD7 race.⁶

Instead, Boulder County proposes a boundary adjustment detaching from CD7 and assigning to CD2 census blocks 080130608011012 (pop. 8), 080130608011006 (pop. 2), 080130608011015 (pop. 0), 080130608011013 (pop. 0), 080130608011007 (pop. 6), 080130608011004 (pop. 1), and 080130608011005 (pop. 0). This proposed boundary adjustment will increase the population of CD2 by 17 from 721,714 to 721,731, and decrease the population of CD7 by the same amount, from 721,714 to 721,697.

These de minimus deviations from the ideal population of 721,714 are justified by the state constitutional mandate to maintain ballot

⁶ The alternative of having Boulder officials confidentially share the votes cast by those two Boulder voters with officials in Broomfield for purposes of Broomfield reporting these voters' selections in Broomfield's result, creates an unacceptable risk of public disclosure between the two counties, and necessarily means that the Secretary's statewide abstract of cast votes will be ambiguous with regard to the allocation of votes for CD7 between Boulder and Broomfield.

secrecy. The Secretary has worked with Boulder County election officials to find a “practical solution” to this problem, but has been unable to find an adequate solution.

Accordingly, the Secretary requests that the Court adopt the proposed adjustment to the CD2-CD7 boundary to ensure that all of Boulder County is included within CD2.

III. Overall impact of the adjustments.

If the Court were to approve each of the proposed adjustments detailed above, the populations of each of the relevant districts would change as follows:

Congressional District	Population Under Adopted Map	Population Under Proposed Revisions
1	721,714	721,714
2	721,714	721,720
3	721,714	721,730
4	721,715	721,796
5	721,714	721,714
6	721,715	721,681
7	721,714	721,697
8	721,714	721,662

And by doing so, the most populous district (CD4) would be 100.011% of the ideal population of 721,714, and the least populous

district (CD8), would be 99.993% of the ideal population. This would result in a population deviation of 0.018%--well below the deviation justified in *Tennant*. See 567 U.S. at 759.⁷

Here, deviating from the ideal population is justified by the state interest in keeping residential parcels intact and preserving ballot secrecy; interests specifically codified by the General Assembly in § 2-1-106(3)(a) and by the people in Colo. Const. art. VII, § 8.

CONCLUSION

The Secretary asks the Court to enter an order approving the proposed adjustments to the Congressional map detailed in the attached Exhibits.

⁷ These calculations are, of course, based on the 2020 census, which is now nearly two years out-of-date. The actual population figures in these districts have likely fluctuated since the count in question.

Respectfully submitted on this 3rd day of February, 2022.

PHILIP J. WEISER
Attorney General

/s/ Peter G. Baumann

LEEANN MORRILL, 38742*
First Assistant Attorney General
PETER G. BAUMANN, 51620*
Assistant Attorney General
Public Officials Unit
State Services Section
Attorneys for Jena Griswold, Colorado
Secretary of State
*Counsel of Record

Colorado Supreme Court 101 West Colfax Avenue, Suite 800 Denver, CO 80202	DATE FILED: February 3, 2022 1:22 PM
Original Proceeding Pursuant to § 2-2-507, C.R.S. (2011)	
In Re Proposed Changes to Borders Between State Senate and House Districts Due to Mapping Errors.	Supreme Court Case No: 2012SA251
ORDER OF COURT	

Upon consideration of the Petition to Alter Boundaries Between Multiple State Senate and House Districts filed by the Colorado Secretary of State on August 24, 2012, together with the responses filed pursuant to the Order of this Court issued August 24, 2012, and now being sufficiently advised in the premises,

IT IS ORDERED that Petition to Alter Boundaries between Multiple State Senate and House Districts shall be, and the same hereby is GRANTED.

IT IS FURTHER ORDERED that the assignment of areas and modification of boundaries for the House and Senate Districts identified in the petition is APPROVED.

BY THE COURT, EN BANC, September 6, 2012.



Case Number: 2012SA251

Caption: In Re: Secretary of State Gessler's Reapportionment

CERTIFICATE OF SERVICE

Copies mailed via the State's Mail Services Division on September 6, 2012.

Andrew A Schmidt
TOWARDS JUSTICE
601 16th Street
Ste. C, # 207
Golden, CO 80401

Andrew C Gorgey
GARFIELD COUNTY
ATTORNEY'S OFFICE
108 8th Street
Suite 219
Glenwood Springs, CO 81601

Arthur A Trezise
GUNNISON COUNTY
ATTORNEY'S OFFICE
200 East Virginia Avenue
Suite 262
Gunnison, CO 81230

Bruce T Barker
WELD COUNTY ATTORNEYS
OFFICE
9019 Avenue
Greeley, CO 80631

Carey R Gagnon
Cassandra Coleman
GARFIELD COUNTY
ATTORNEY'S OFFICE
108 8th Street, Suite 219
Glenwood Springs, CO 81601

Carol Tullis
Montezuma County Clerk &
Recorder
140 West Main Street #1
Cortez, CO 81321

Christine C Stretesky
ARAPAHOE COUNTY OFFICE
OF THE COUNT
5334 S. Prince Street
Littleton, CO 80120

Christopher Price
MURRAY DAHL
KUECHENMEISTER & RENAUD
1530 16th Street, Ste 200
Denver, CO 80202

Clean Water Action
c/o Gary Wockner, Director
1630 S. College Ave., C-1
Fort Collins, CO 80525

David M Baumgarten
COUNTY ATTY OFFICE
200 E Virginia Ave
Gunnison, CO 81230

David R Fine
MCKENNA LONG &
ALDRIDGE, LLP
1400 Wewatta Street
Ste. 700
Denver, CO 80202

Ellen G Wakeman
JEFFERSON COUNTY
ATTORNEYS OFF
100 Jefferson County Pkw #5500
Golden, CO 80419

George N Monsson
EL PASO COUNTY
200 S. Cascade
Colorado Springs, CO 80903

Gerald E Dahl
MURRAY DAHL
KUECHENMEISTER & RENAUD
1530 16th Street
Suite 200
Denver, CO 80202

J. MFay
2575 S. Syracuse Way, F 201
Denver, CO 80231

Jason RDunn
BROWNSTEIN HYATT FARBER
SCHRECK, LL
410 Seventeenth Street
Suite 2200
Denver, CO 80202

Jennette C Roberts
MCKENNA LONG &
ALDRIDGE LLP
1400 Wewatta Street
Suite 700
Denver, CO 80202

Jeremiah B Barry
LEGISLATIVE LEGAL SERVICE
091 State Capitol
Denver, CO 80203

John E Bush Jr.
ARAPAHOE CO ATTORNEY'S
OFFICE
5334 S Prince St
Littleton, CO 80120-1136

Joseph A Salazar
THE SALAZAR CONSULTANT
GROUPLLC
2318 E. 116th Avenue
Denver, CO 80233

Joseph G Martinez
MCKENNA LONG &
ALDRIDGE
1400 Wewatta Street
Suite 700
Denver, CO 80202

Kate Meyer
Colorado Reapportionment
Commission
1313 Sherman Street, Room 122
Denver, CO 80203

Katherine A Meyer
OFFICE OF LEGISLATIVE
LEGAL SERVICE
State Capital
Room091
Denver, CO 80203

Kathryn L Schroeder
LAW OFFICE OF KATHRYN L.
SCHROEDER
P.o. Box 22563
Denver, CO 80222

Kendra L Carberry
HAYES PHILLIPS, HOFFMANN
&CARBERRY
1530 Sixteenth St #200
Denver, CO 80202

Mario D Nicolais II
HACKSTAFF LAW GROUP, LLC
1601 Blake Street, Suite 310
Denver, CO 80228

Martha M Tierney
HEIZER, PAUL, GRUESKIN
LLP
2401 15th Street
Ste. 300
Denver, CO 80202

Matthew D Grove
COLORADO DEPARTMENT OF
LAW
1525 Sherman Street
7th Floor
Denver, CO 80202

Mi Familia Vota Education Fund
c/o Grace Lopez Ramirez
2525 W. Alameda Ave.
Denver, CO 80219

Michael D Hoke
BROWNSTEIN HYATT FARBER
SCHRECK, LL
410 17th Street
Suite 2200
Denver, CO 80202

Michael P Cerbo
COLORADO AFL-CIO
140 Sheridan Blvd.
Denver, CO 80226

NARAL Pro-Choice Colorado Inc.
1905 Sherman St., Suite 800
c/o Toni Panetta
Denver, CO 80203

New Era Colorado
c/o Steven Fenberg
1648 Spruce St., Office Unit
Boulder, CO 80302

Olivia Mendoza
Colorado Latino Forum
309 West First Avenue
Denver, CO 80223

Peter L Vana III
WASHINGTON COUNTY
ATTORNEY
26861 Hwy 34
Akron, CO 80720

Planned Parenthood Votes Colorado
7155 E. 38th Ave.
Denver, CO 80207

Richard A Westfall
HALE WESTFALL LLP
1445 Market Street
Suite 300
Denver, CO 80202-1154

Richard C Kaufman
RYLEY CARLOCK &
APPLEWHITE
1700 Lincoln Street
Ste. 3500
Denver, CO 80203

Robert A McGuire III
ROBERT A. MCGUIRE,
ATTORNEY AT LAW,
1624 Market Street
Ste. 202
Denver, CO 80202

Robert G Land
NEWNAM LAND L.L.P
201 S. Commercial
Trinidad, CO 81082

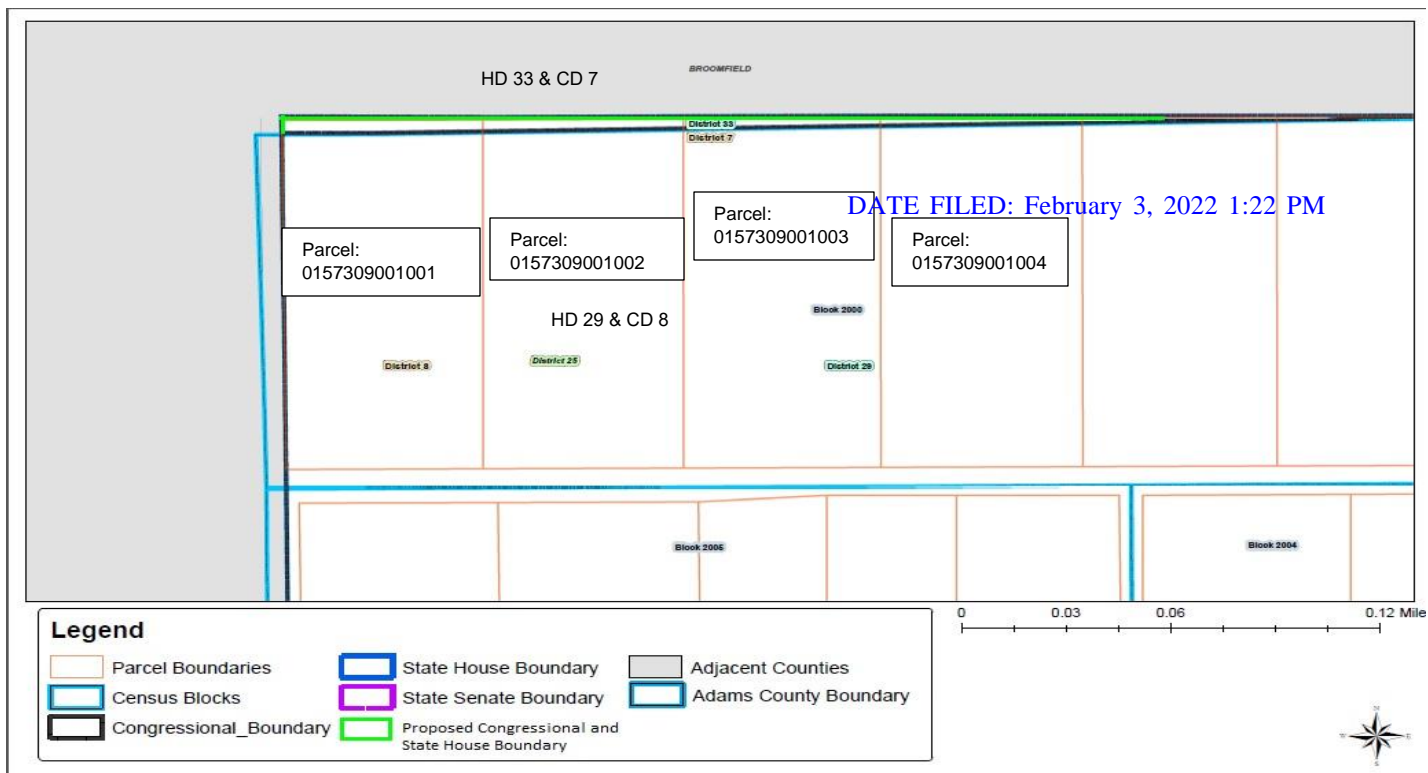
Robert J Franek
GRAND COUNTY
PO Box 264
Hot Sulphur Springs, CO 80451

Ronald A Carl
ARAPAHOE CO ATTORNEY'S
OFFICE
5334 S. Prince Street
Littleton, CO 80120

Troy C Bratton
COLORADO SECRETARY OF
STATE'S OFFIC
1700 Broadway
Suite 200
Denver, CO 80290

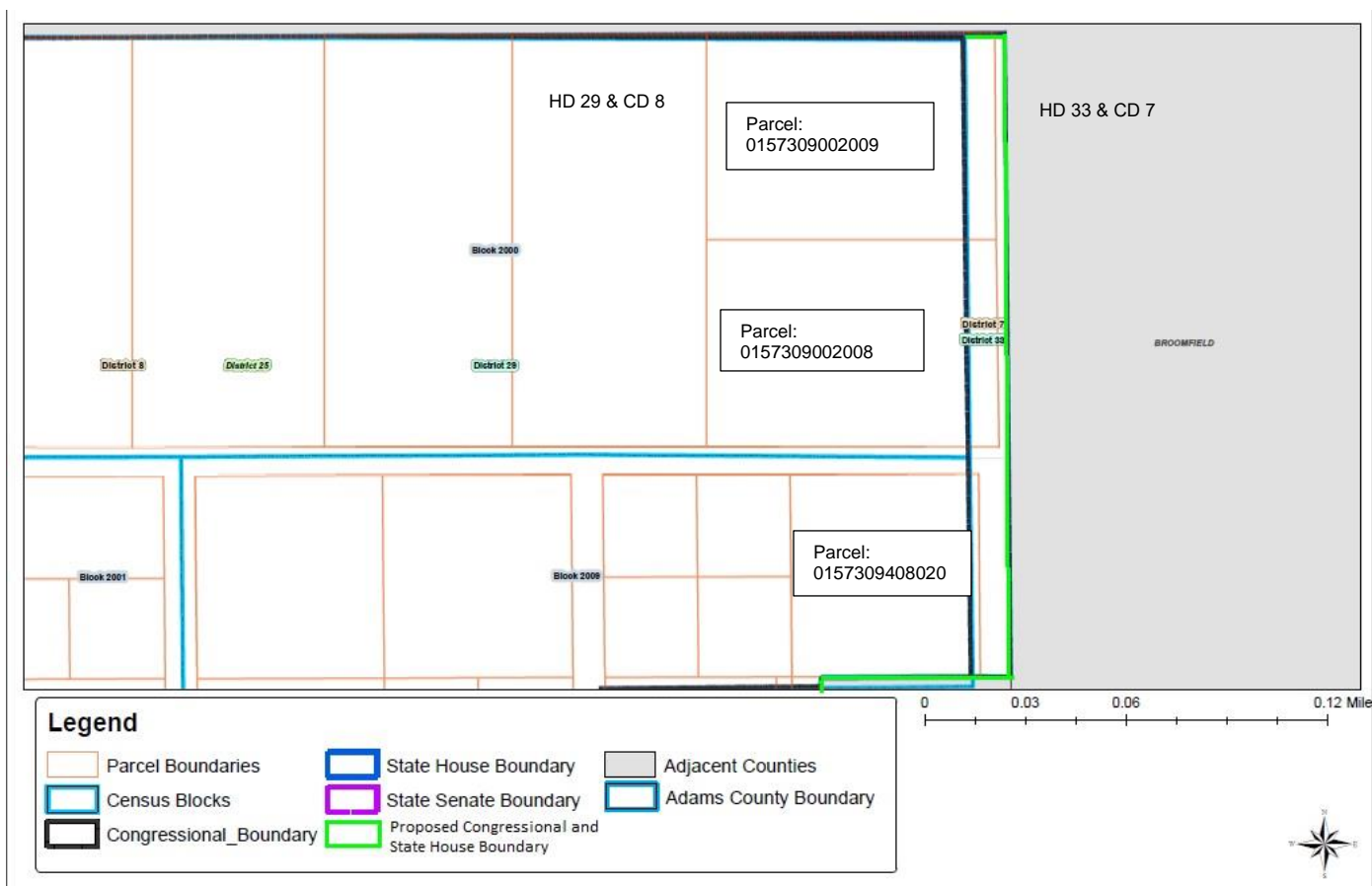
William E Zimsky
ABADIE & SCHILL, P.C.
1099 Main Ave.
Ste. 315
Durango, CO 81301

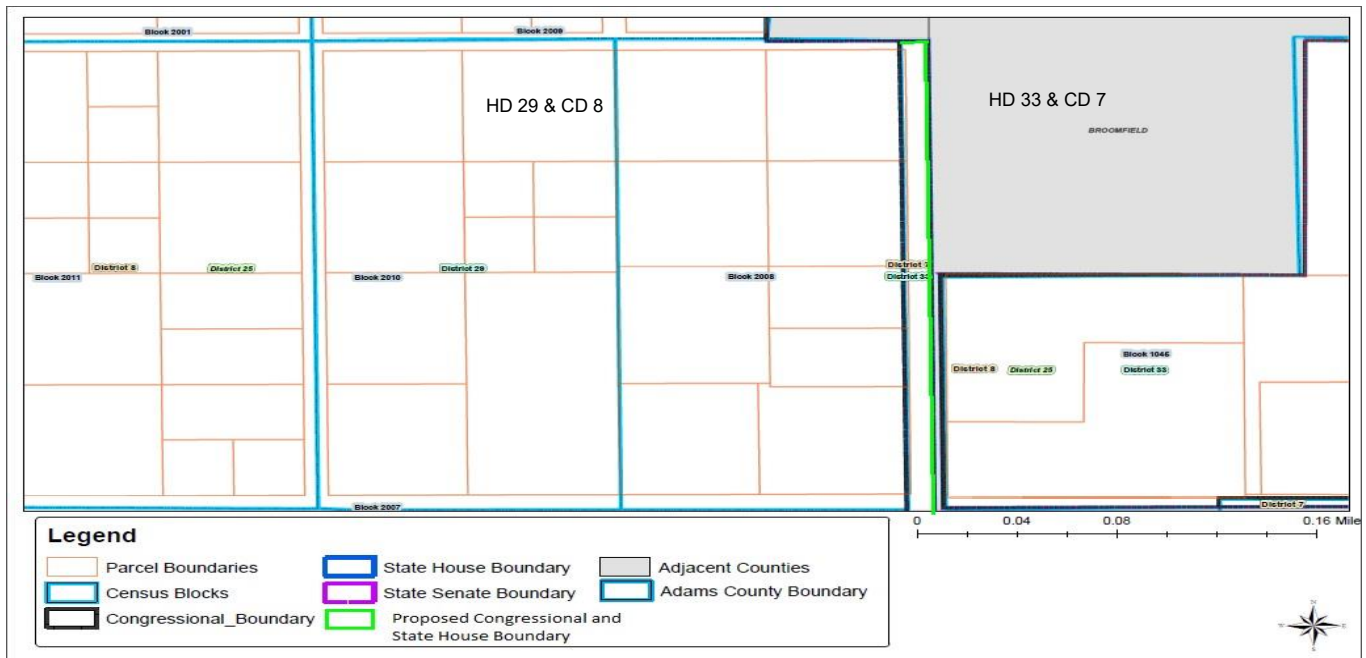
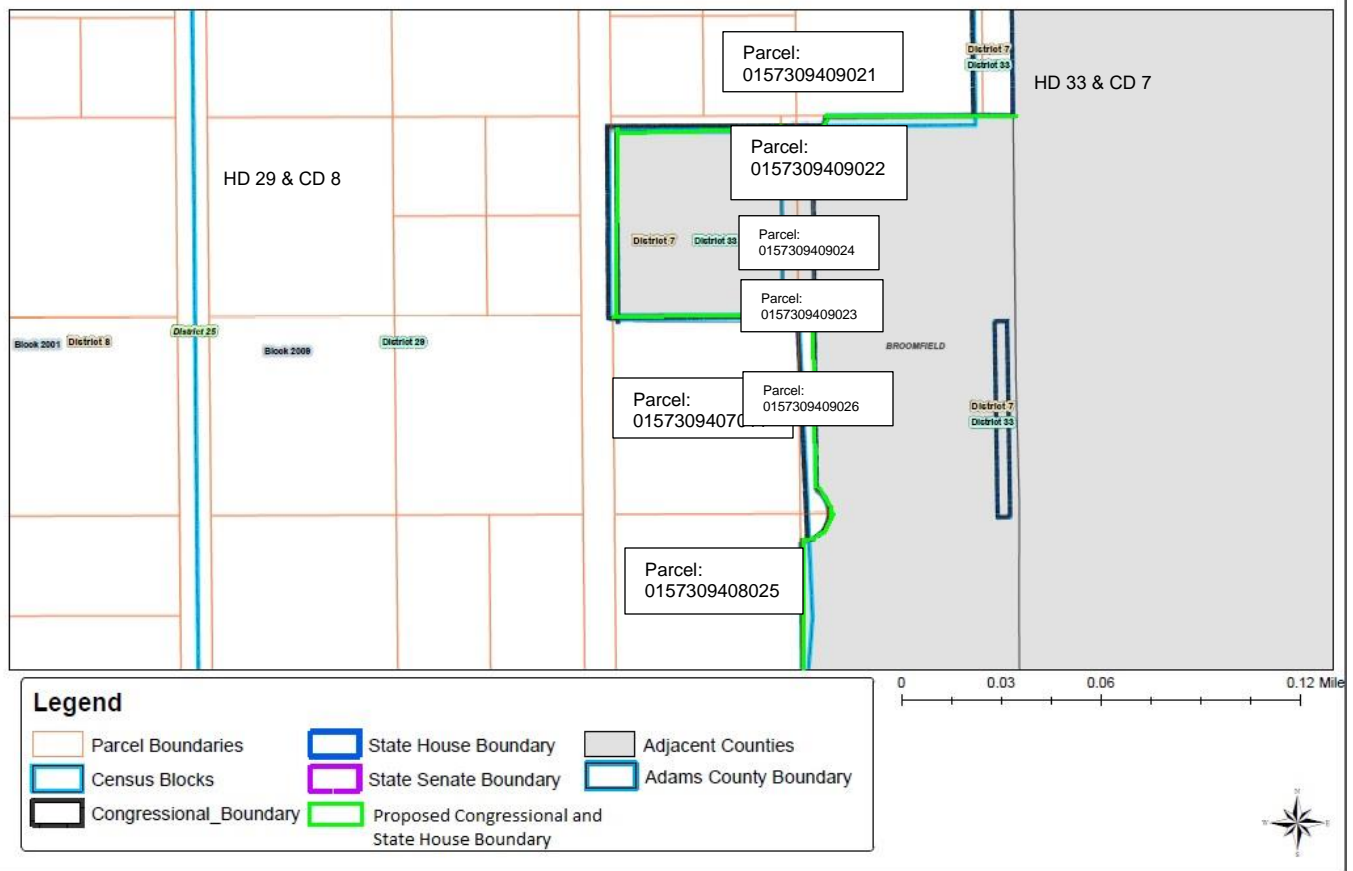
Writer Mott
JEFFERSON COUNTY ATTN
100 Jefferson County Pkway
Suite 5500
Golden, CO 80419

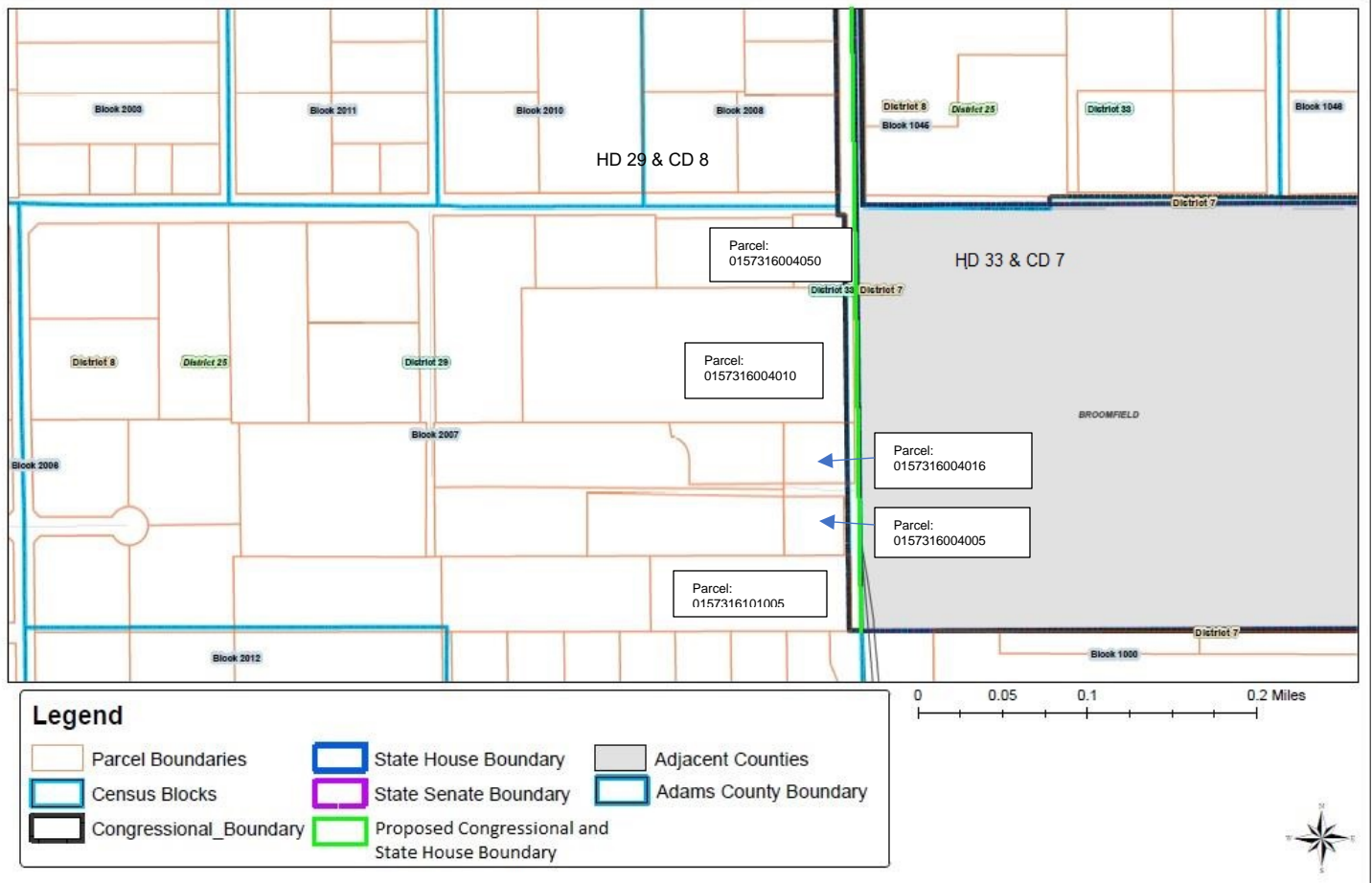


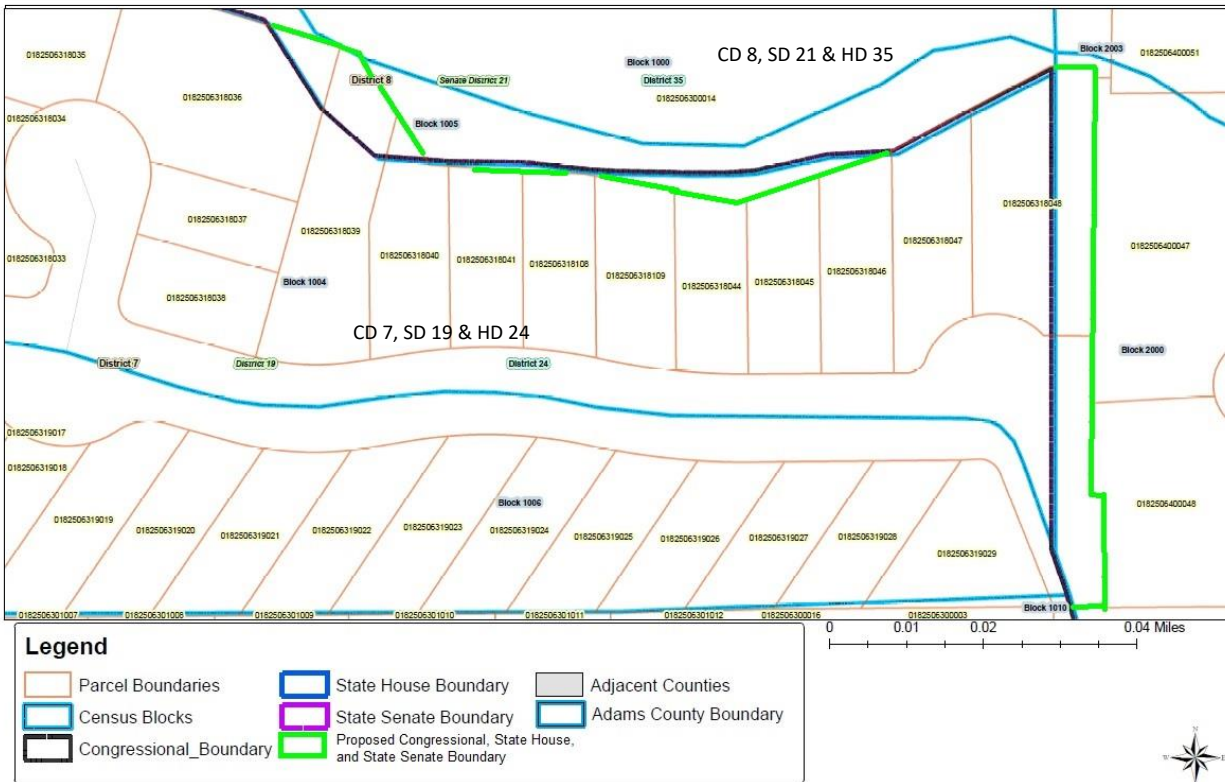
Currently the Congressional boundaries and the State House Boundaries are misaligned in the upper corner, leaving the sliver of the 3 parcels in a different Congressional District and different State House District.

The Bright Green line shows where the single boundary line should be – for both the Congressional District and for the State House District. Each of the following pictures show the same situation:







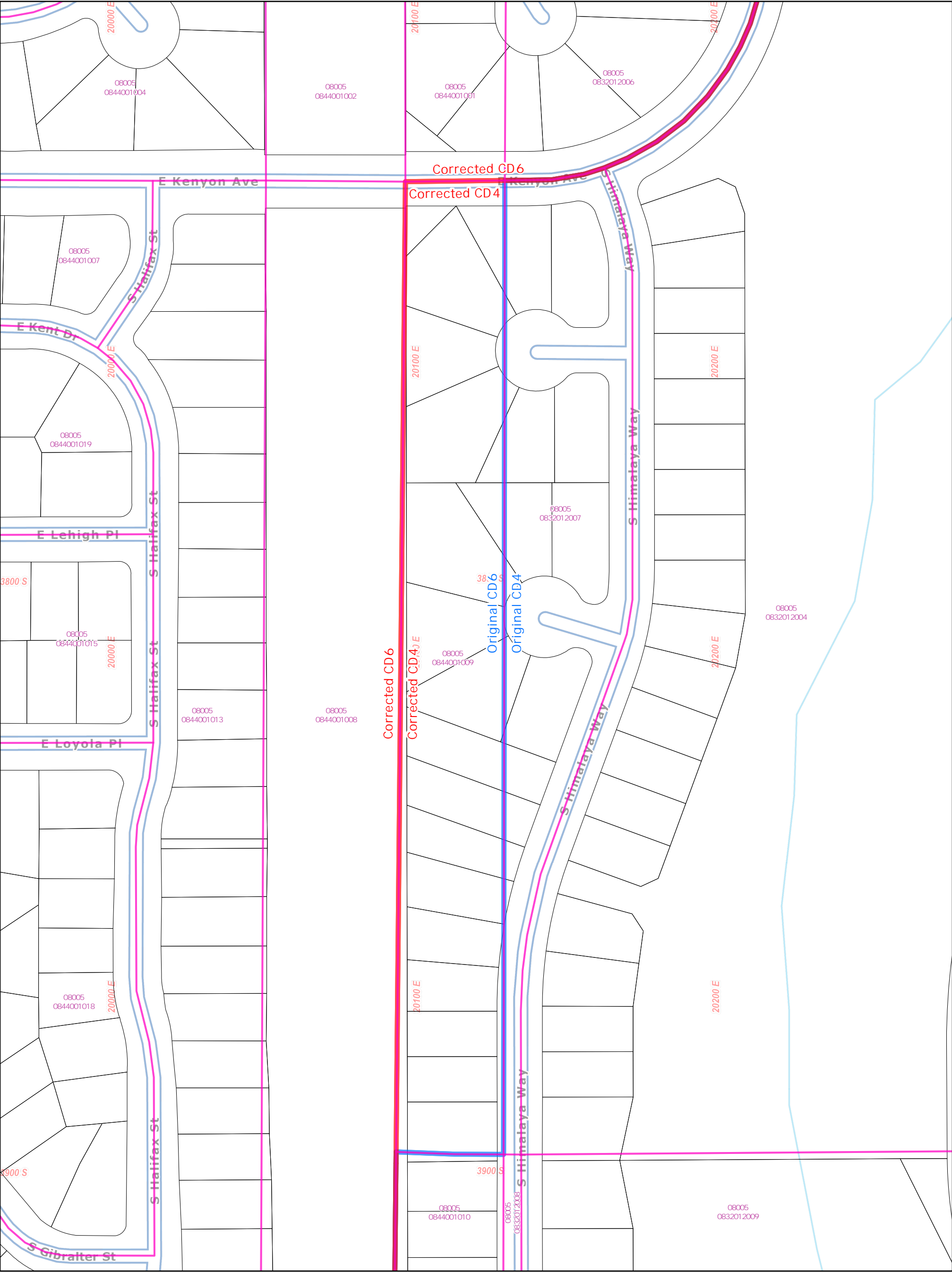


The Black line is the Congressional District Line.

The Dark Blue line (under the Black Line) is the State House Line.

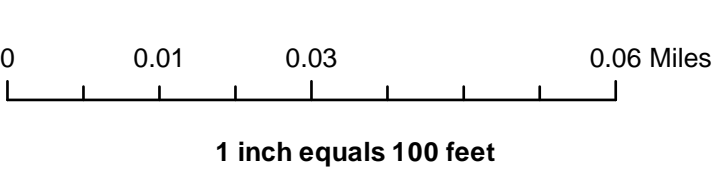
The Bright Pink Line (under the Black Line) is the State Senate Line.

The Bright Green line is the proposed new Boundary Line for all 3 Districts.



Proposed Correction to CD4 & CD6

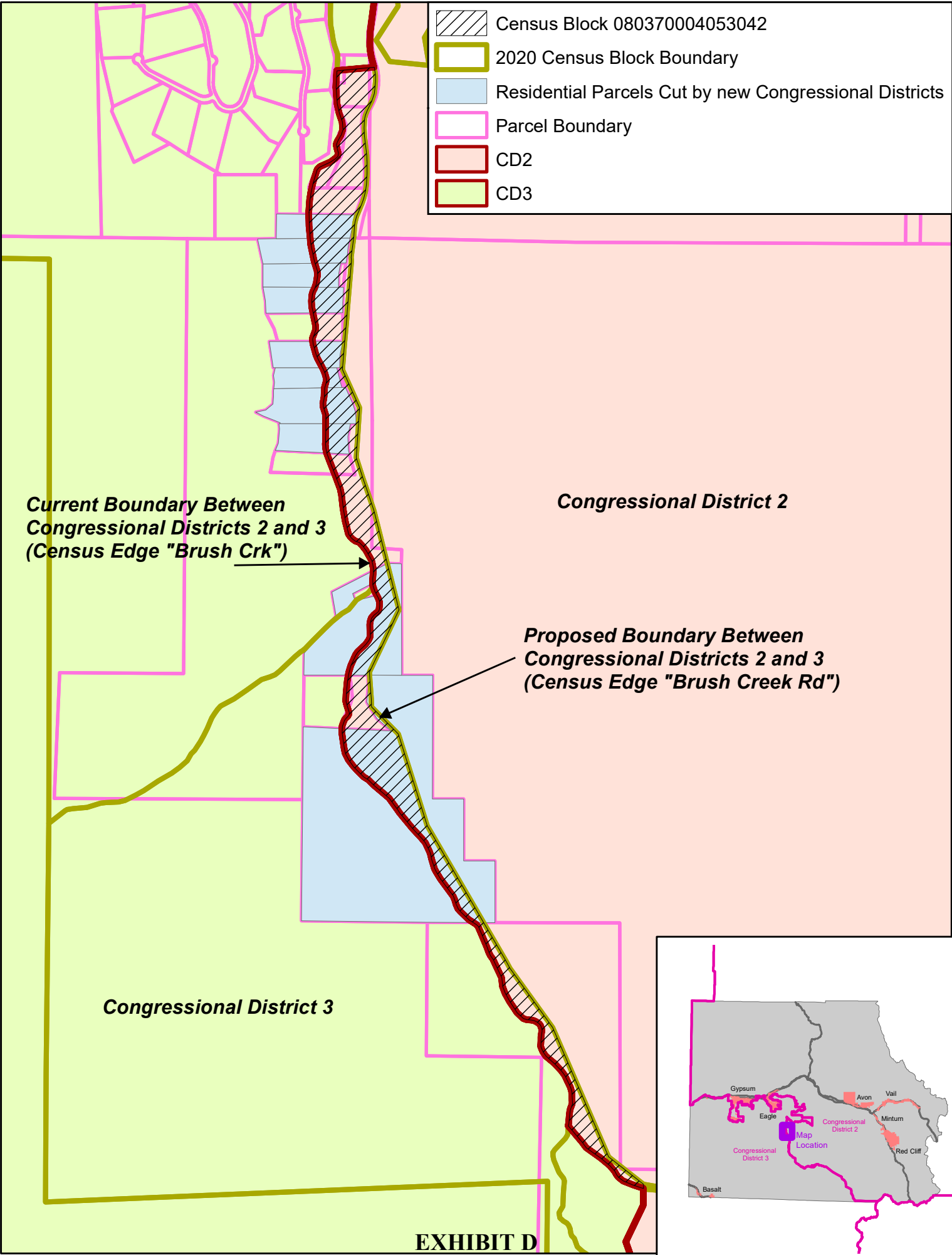
Map Provided by Arapahoe County GIS



Map generated on 12/15/2021 9:42 AM

EXHIBIT C

- Original Congressional Districts
- Corrected Congressional Districts
- 2020 Census Blocks
- Parcels



Weld County

Congressional Redistricting

Comments:
Congressional A1, A2, A3, A4,
A46, A47, A50

Legend

Congressional Districts

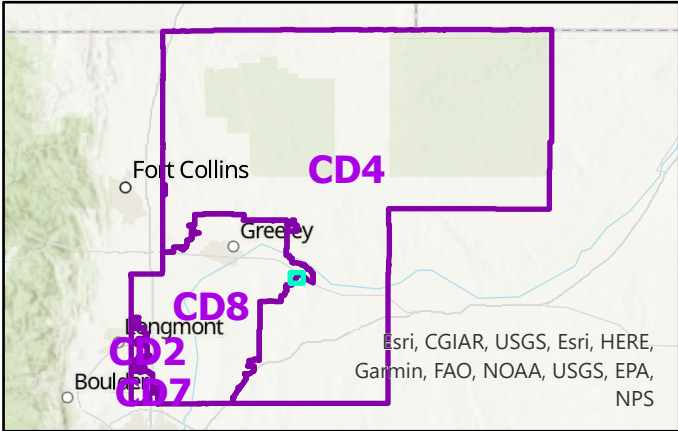
Proposed Change

Census Blocks

Residential Split Parcels

Parcels

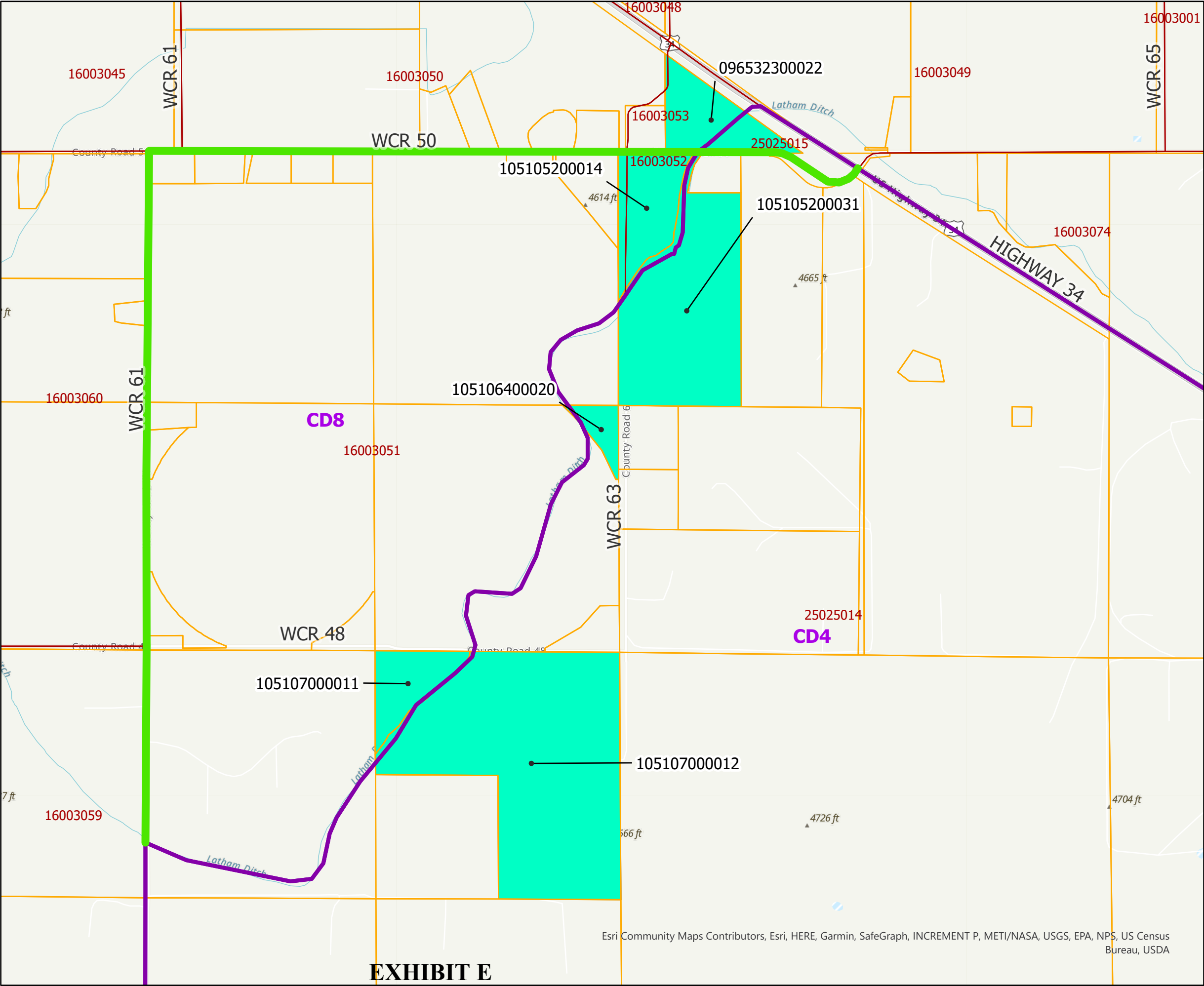
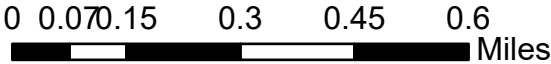
Road Labels



Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

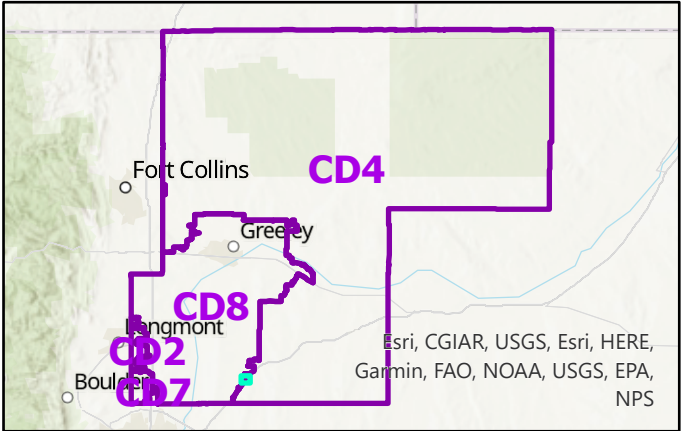
Carly Koppes
Weld County Clerk and Recorder



Weld County Congressional Redistricting

Comments:
Congressional A13

- Legend**
- Congressional Districts
 - Proposed Change
 - Census Blocks
 - Residential Split Parcels
 - Parcels
 - Road Labels



Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

Carly Koppes
Weld County Clerk and Recorder



0 0.050.1 0.2 0.3 0.4
Miles

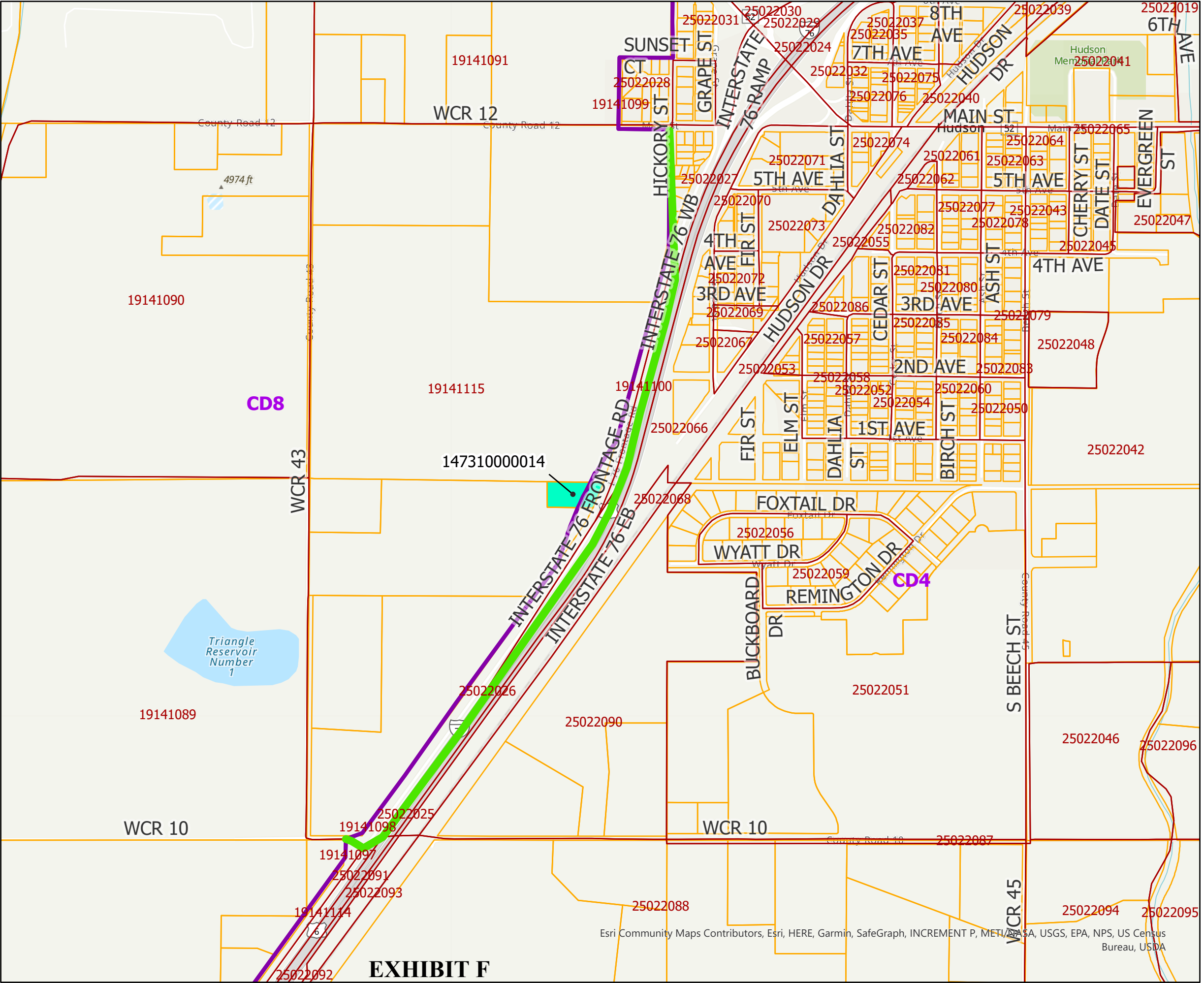


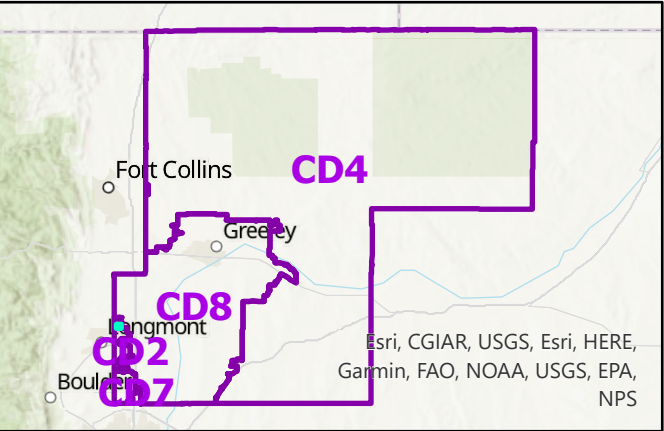
EXHIBIT F

Weld County

Congressional Redistricting

Comments:
Congressional A38

- Legend**
- Congressional Districts
 - Proposed Change
 - Census Blocks
 - Residential Split Parcels
 - Parcels
 - Road Labels



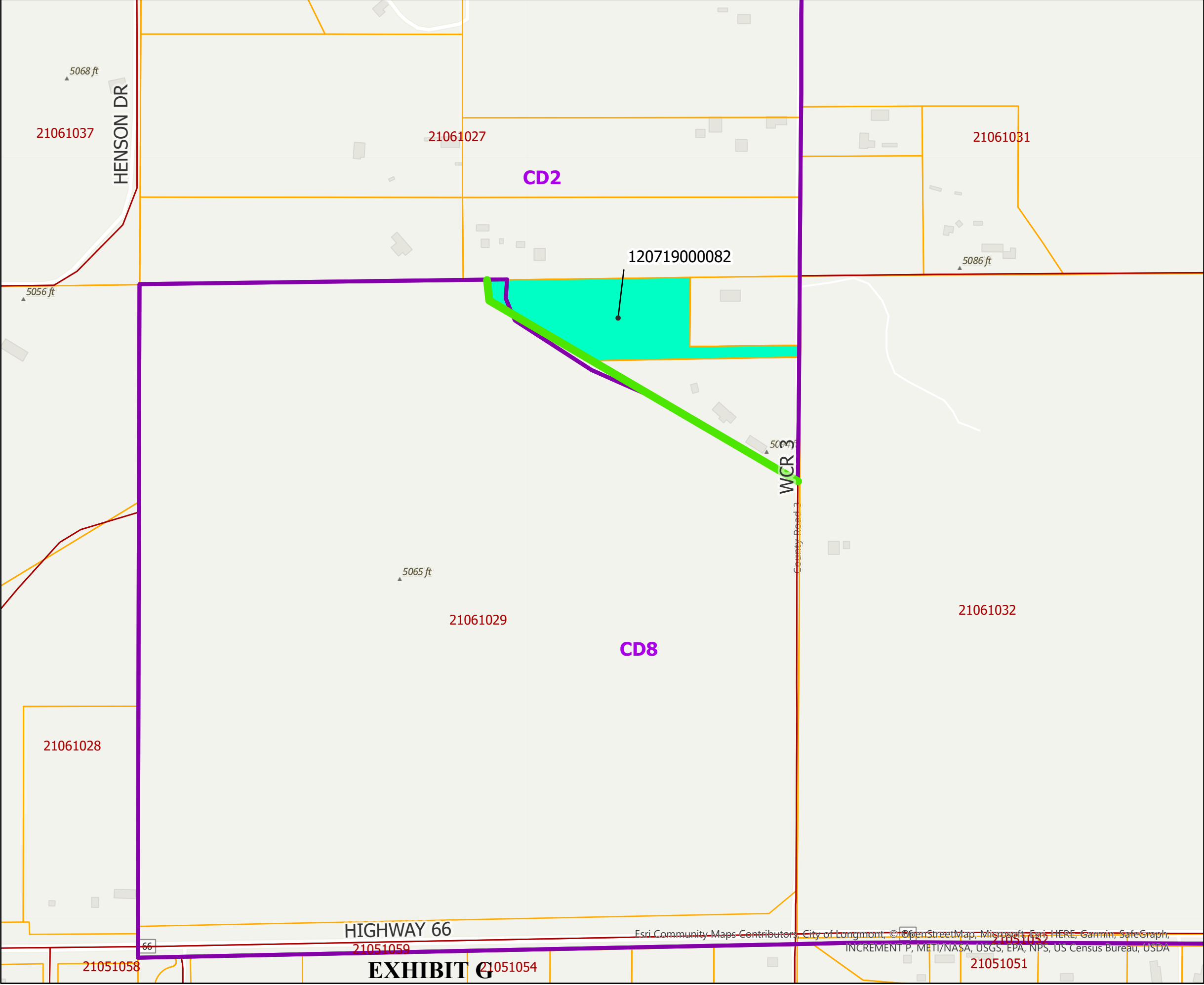
Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

Carly Koppes
Weld County Clerk and Recorder



0 0.04 0.07 0.14 0.21 0.28 Miles



HIGHWAY 66

EXHIBIT G

Esri Community Maps Contributors, City of Longmont, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, INCREMENT P, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

Weld County Congressional Redistricting

Comments:
Congressional A40

- Legend
- Congressional Districts

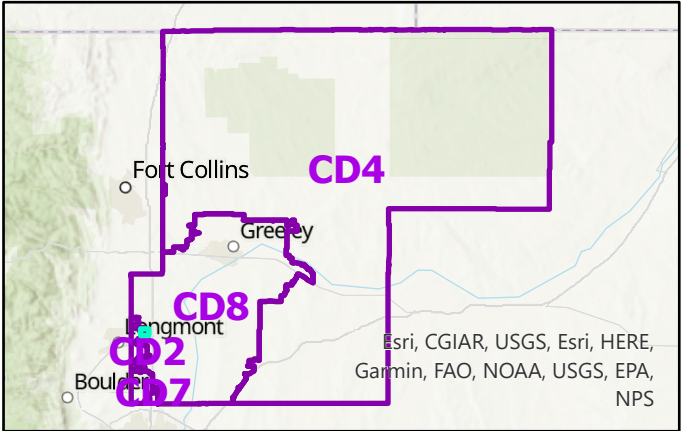
Proposed Change

Census Blocks

Residential Split Parcels

Parcels

Road Labels



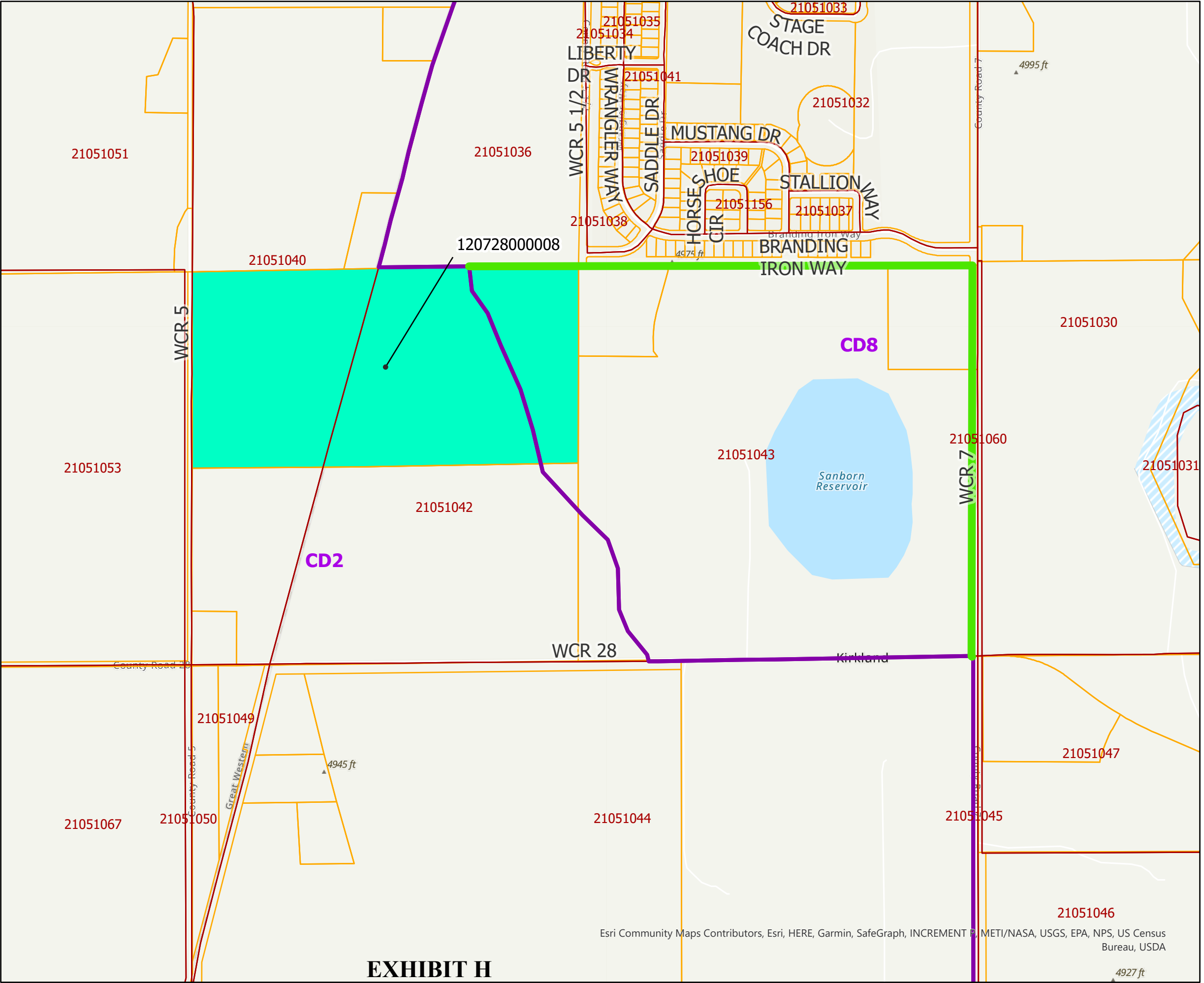
Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

Carly Koppes
Weld County Clerk and Recorder



0 0.05 0.1 0.2 0.3 0.4 Miles



Weld County 6
CD2-8 HD19-64

Legend

- Congressional Districts
- Proposed Change
- Census Blocks
- Residential Split Parcels
- Parcels
- Road Labels

Disclaimer






This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

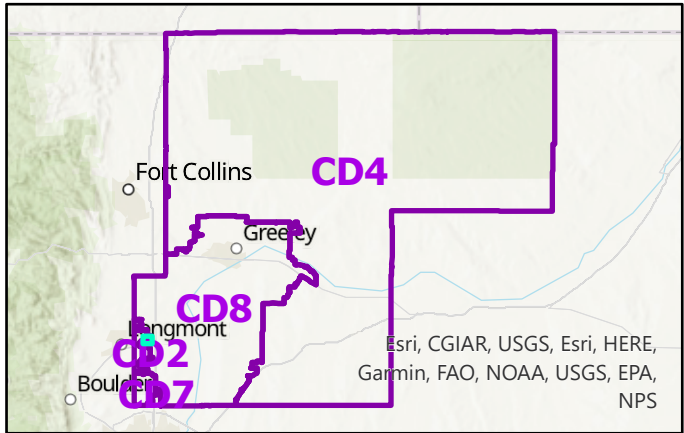
Carly Koppes
Weld County Clerk and Recorder

EXHIBIT I

Map Labels:

- CD2, CD4, CD8, CD7
- HD19, HD64
- WCR 5, WCR 7, WCR 26, WCR 24 1/2, WCR 5 1/2
- Parcels: 21051068, 21051050, 21051049, 21051067, 21051044, 120733300011, 21051045, 21051046, 4927 ft, 21051047, 21051086, 21051084, 21051095, 21051085, 21051096, 21051122, 21051125, 21051121, 21051120, 120733400010, 21051116, 21051112, 21051119, 21051118, 21051117, 21051115, 21051123, 21051124, 21051126, 21051127, 21051128, 21051129, 21051130, 21051131, 21051133, 21051135, 21051150, 21051081, 21051083, 21051080, 21051082, 21051094, 2101001, 2101009, 2101008
- Roads: ASHTON RD, N BEASLY RD, PLEASANT VIEW RD, CENTER DR, PEARL HOWLETT RD, VICTOR DR, MONTGOMERY CIR, BRYANT DR, PLEASANT HILL RD, BEASLY RD, ELMER RD, LINN DR

-  Congressional Districts
-  Proposed Change
-  Census Blocks
-  Residential Split Parcels
-  Parcels
- Road Labels



Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

Carly Koppes
Weld County Clerk and Recorder

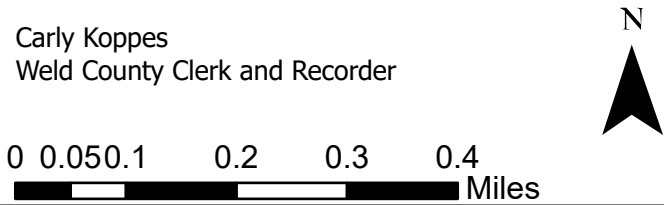


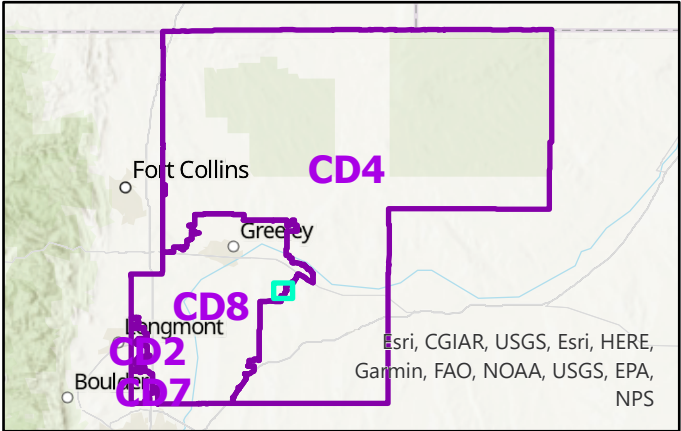
EXHIBIT I

Weld County

Congressional Redistricting

Comments:
Congressional A5, A6, A9, A11,
A12

- Legend**
- Congressional Districts
 - Proposed Change
 - Census Blocks
 - Residential Split Parcels
 - Parcels
 - Road Labels



Disclaimer

This product has been developed solely for internal use only by Weld County. The GIS database, applications, and data in the product is subject to constant change and the accuracy and completeness cannot be and is not guaranteed. The designation of lots or parcels or land uses in the database does not imply that the lots or parcels were legally created or that the land uses comply with applicable State or Local law. UNDER NO CIRCUMSTANCE SHALL ANY PART THE PRODUCT BE USED FOR FINAL DESIGN PURPOSES. WELD COUNTY MAKES NO WARRANTIES OR GUARANTEES, EITHER EXPRESSED OR IMPLIED AS TO THE COMPLETENESS, ACCURACY, OR CORRECTNESS OF SUCH PRODUCT, NOR ACCEPTS ANY LIABILITY, ARISING FROM ANY INCORRECT, INCOMPLETE OR MISLEADING INFORMATION CONTAINED THEREIN.

Carly Koppes
Weld County Clerk and Recorder



0 0.130.25 0.5 0.75 1 Miles

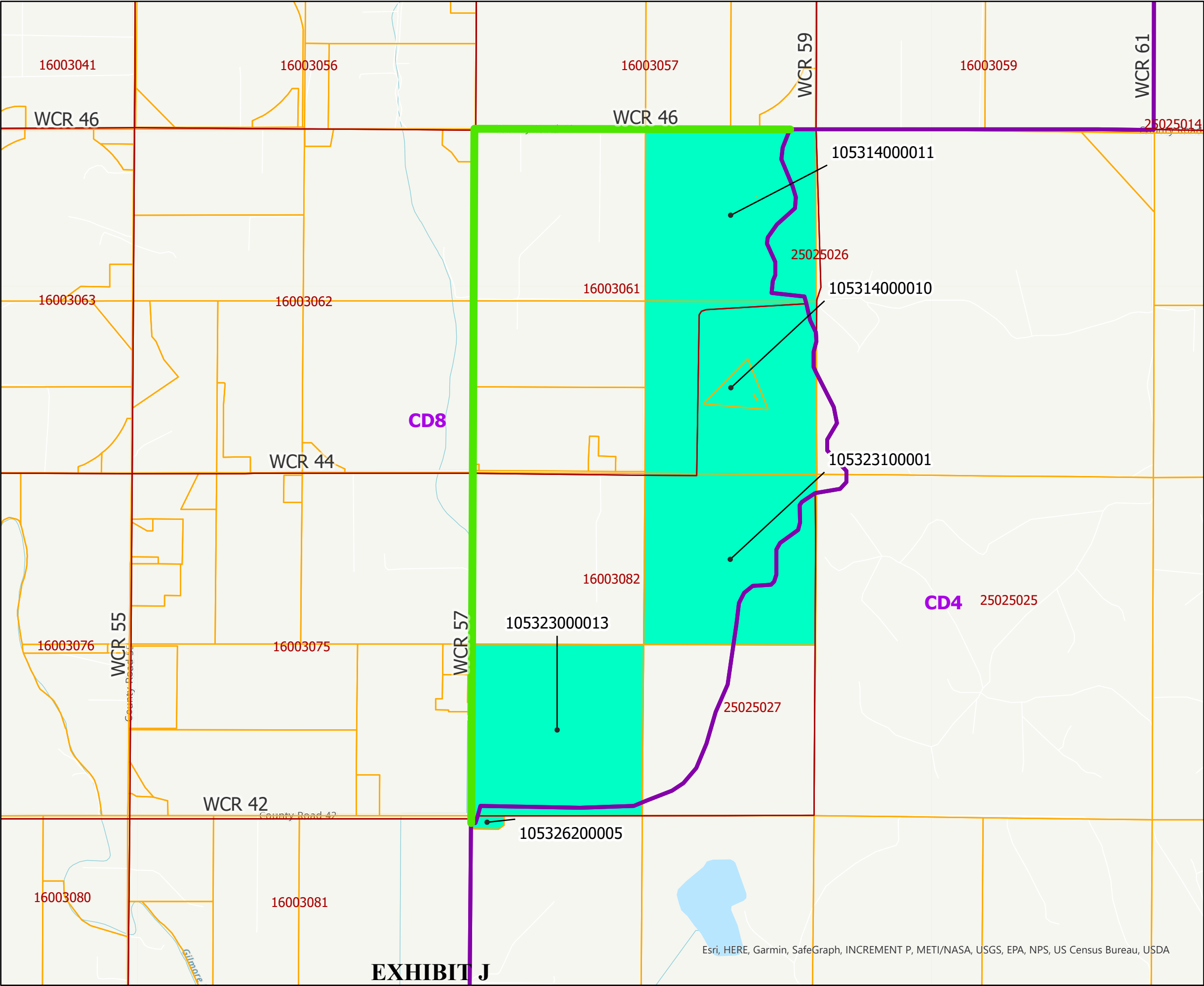


EXHIBIT J

Reassign the blocks in the following table from Congressional District 7 to Congressional District 2.

Justification: These blocks are currently the only Congressional District 7 blocks in Boulder County. This situation would require the establishment of a precinct consisting solely of the blocks assigned to Congressional District 7, resulting in a precinct with a census population of 17 and 5 voters.

Such a precinct would present severe loss of voter anonymity and possible reduction of voter participation.

GEOID20 (Census Block)	Total Population	Voters	Parcel
080130608011012	8	0	157521000022
080130608011006	2	0	157522000016
080130608011015	0	0	157527000008
080130608011013	0	0	157528000001
080130608011007	6	4	157522000003
080130608011004	1	1	157527000010
080130608011005	0	0	157528000001
Total	17	5	

