



August 10, 2022

Submitted via email

New York City Districting Commission
253 Broadway, 3rd floor
New York, NY 10007

Re: Need for Transparency in the Commission's Mapping Discussions and Decisions

Dear Districting Commissioners,

We want to congratulate you on completing the first round of preliminary hearings. The hundreds of comments, testimonies, and maps submitted to the Commission show that New Yorkers are eager to be part of the City Council redistricting process.

However, our organizations are disappointed that, to date, all mapping negotiations have taken place in secret and the reasons behind your mapmaking decisions have not been revealed. We ask that you make these elements of your work public after the August hearings.

The public was not exposed to negotiations the Commission had about drawing the preliminary Council lines. While we understand the Commission's need to work in small subcommittees, key mapping issues should be brought for a discussion before the Commission as a whole. There is no reason for discussions over the final configuration of the plan to be kept out of the public's eye.

We are particularly concerned by recent reports about possible backroom deals between appointing authorities, and their influence over mapping decisions.¹ Making such crucial discussions and decisions ahead of public meetings in private conversations erodes the public trust in the process, which has already weakened following the state redistricting process.

The public was also not given the reasons behind the proposed lines. The draft redistricting plan was published with no meaningful oral or written explanation to elucidate the justifications for districts. This process left New Yorkers struggling to understand why their lines were drawn the way they were. We repeatedly hear this complaint from community groups that wish to comment on the draft maps.

For example, the proposed plan exceeded the Commission's own analysis of district population limits without clarifying this shift to the public². Some districts were significantly redrawn, most notably in south Brooklyn and western Queens, with scant information on why the lines were moved to where they were.

¹ Politico NY, 07/27/22, *How a Republican is reshaping Democratic New York City's once-in-a-decade redistricting*
<https://www.politico.com/news/2022/07/27/republican-reshaping-new-york-city-redistricting-00047995>

² The Commission's Primer and 5% Deviation Guide noted districts can be as low as 168,000 and as high as 177,000, but the proposed map include districts as low as 165,470.

Open meetings on mapping deliberations are not an uncommon practice for commission-led redistricting processes. In fact, the 2012-2013 NYC Districting Commission held multiple public meetings on maps, including district-by-district presentations on the reasoning behind every proposed line and the public's concerns about each area. These public meetings offered commissioners a chance to make specific comments on proposed maps, reach a consensus, and vote on recommended changes - all in public.³

The many New Yorkers that have made their voices heard on redistricting deserve to see how those comments are being synthesized and debated by the Commission. Holding mapping deliberations in public clarifies mapmakers' intentions, prompts healthy dialogue between commissioners, and reduces the potential power of outside influences on the process.

We urge you to hold mapping deliberations as part of an open public meeting and provide the public with a detailed explanation of how and why the new Council lines are drawn.

Sincerely,

Citizens Union

Central Queens Redistricting Coalition

Common Cause/NY

DominicanosUSA

LatinoJustice PRLDEF

League of Women Voters of the City of New York

New York Public Interest Research Group

Reinvent Albany

APA VOICE Redistricting Task Force:

Academy of Medical & Public Health Services

Asian American Legal Defense and Education Fund (AALDEF)

Asian American Bar Association of New York

Asian Americans for Equality

Caribbean Equality Project

CHHAYA CDC

Chinese-American Planning Council

Chinese Progressive Association

Coalition for Asian American Children and Families

DRUM Desis Rising Up and Moving

³ See, for example, minutes and transcript of the September 4, 2012 public meeting where the first draft map was published; of the October 18 2012 public meeting, which followed the second round of public hearings; and of the January 23, 2013 public meeting, which followed the third round of public hearings.

Homecrest Community Services
Immigrant Social Services
Korean Community Services of Metropolitan New York
Little Manila Queens Bayanihan Arts
MinKwon Center for Community Action
National Federation of Filipino American Associations New York Chapter
OCA-NY Asian Pacific American Advocates
South Asian Council for Social Services
South Queens Women's March
United Chinese Association of Brooklyn
Woodside on the Move