Filed 01/24/2022 Commonwealth Court

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Carol Ann Carter, Monica Parrilla, Rebecca Poyourow, William Tung, Roseanne Milazzo, Burt Siegel, Susan Cassanelli, Lee Cassanelli, Lynn Wachman, Michael Guttman, Maya Fonkeu, Brady Hill, Mary Ellen Balchunis, Tom DeWall, Stephanie McNulty and Janet Temin, Petitioners	: CASES CONSOLIDATED : : : :
v. Veronica Degraffenreid, in her official	No. 464 M.D. 2021
capacity as the Acting Secretary of the Commonwealth of Pennsylvania; Jessica Mathis, in her official capacity as Director for the Pennsylvania Bureau of Election Services and Notaries, Respondents	: : :
Philip T. Gressman, Ron Y. Donagi; Kristopher R. Tapp; Pamela Gorkin; David P. Marsh; James L. Rosenberger; Amy Myers; Eugene Boman; Gary Gordon; Liz McMahon; Timothy G. Feeman; and Garth Isaak, Petitioners	: : : :
V.	: No. 465 M.D. 2021
Veronica Degraffenreid, in her official capacity as the Acting Secretary of the Commonwealth of Pennsylvania; Jessica Mathis, in her official capacity as Director for the Pennsylvania Bureau of Election Services and Notaries, Respondents	: : : :

PROPOSED REDISTRICTING PLAN AND SUPPORTING STATEMENT OF AMICI CURIAE DRAW THE LINES PA PARTICIPANTS

Pursuant to this Court's Order of January 14, 2022, Adam Dusen, Sara Stroman, Mike Walsh, Myra Forrest, Athan Biss, Michael Skros, Susan Wood, Jean Handley, Daniel Mallinson, Jesse Stowell, Sandra Strauss, Rick Bryant, Jeffrey Cooper, Kyle Hynes, Priscilla McNulty and Joseph Amodei, each of whom is affiliated in some manner with the Draw the Lines PA project, (the "DTL Amicus Participants") hereby submit their proposed 17-district congressional redistricting map (the "PA Citizens' Map") and supporting statement in the above-captioned proceeding.

BACKGROUND

Draw the Lines PA ("DTL") is a statewide project of the Committee of Seventy, a 117-year-old nonpartisan civic leadership organization that advances representative, ethical and effective government in Philadelphia and Pennsylvania through citizen engagement and public policy advocacy. *See* https://drawthelinespa.org/ (last accessed January 24, 2022). Launched in 2018, DTL is a nonpartisan education and engagement initiative that has attempted to demonstrate that ordinary Pennsylvanians, when given the same digital tools and data used in the political redistricting process, can, through a fair and transparent process, produce voting districts that are objectively better by standard mapping metrics.

Three years ago, DTL held the first of five public mapping competitions. At the completion of the final DTL competition, DTL formed the Citizen Map Corps, which is comprised of citizen mappers from throughout the Commonwealth. Together with DTL staff and a nonpartisan DTL Steering Committee that includes esteemed Pennsylvania civic, academic and business leaders, the Citizen Map Corps created and published the "Pennsylvania Citizens' Map" in September 2021. The nonpartisan Citizens' Map is a 17-district congressional map that aggregates what over 7,200 Pennsylvanians, representing 40 of Pennsylvania's 67 counties, collectively mapped. The map is superior when measured according to legal and constitutional metrics, including compactness, contiguity, population equality and limiting jurisdictional splits, see League of Women Voters of Pennsylvania v. Commonwealth, 178 A.3d 737, 742 (Pa. 2018), as well as compliance with the Voting Rights Act and other metrics important to Pennsylvanians, including competitiveness, partisan fairness, and representation of communities of interest.

DTL presented The Citizens' Map to leadership in the Pennsylvania State Senate and the Pennsylvania House of Representatives as a potential starting point for the General Assembly's reapportionment work. Governor Wolf has touted the Citizens' Map as meeting the principles proposed by his Pennsylvania Redistricting Advisory Council and the map currently is being considered by the Senate State Government Committee.

The DTL Amicus Participants are citizens of the Commonwealth of Pennsylvania and are registered to vote in Pennsylvania. Each of the DTL Applicants either serves as a member of the Citizen Map Corps or as a member of the DTL Steering Committee.

The DTL Amicus Participants sought leave to participate in these proceedings as intervenors. In its Order of January 14, 2022, this Court denied the DTL Amicus Participants leave to participate as intervenors, but granted them leave to participate as Amicus Participants and to submit a "proposed 17-district congressional redistricting map/plan that is consistent with the results of the 2020 Census . . . and, if the Amicus Participant chooses to do so, a supporting brief and/or a supporting expert report" by 5 pm on Monday January 24, 2022. This submission is made by the DTL Amicus Participants pursuant to the Court's January 14, 2022 Order.

THE PA CITIZENS' MAP

Attached as Exhibit "A" hereto is the PA Citizens' Map. The PA Citizens' Map aims to balance the many values that the DTL citizen mappers found to be important. This includes creating compact, competitive districts that minimize county and municipal splits and honor the geographically and culturally distinct regions in Pennsylvania. Further, it aims to honor the requirements of the Voting Rights Act.

Attached as Exhibit "B" is the statement of Justin Villere, Managing Director of DTL, explaining how the PA Citizens' Map was developed, how it addresses the 2020 Census data and how it addresses establishment of districts of equal population, that are contiguous and compact, that minimize jurisdictional splits and comply with the Voting Rights Act.

Dated: January 24, 2021

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: <u>/s/ John P. Lavelle, Jr.</u> John P. Lavelle, Jr. (Pa. ID No. 54279) 1701 Market Street Philadelphia, PA 19103-2921 +1.215.963.5000 john.lavelle@morganlewis.com

Counsel for the DTL Amicus Participants

CERTIFICATE OF COMPLIANCE

I hereby certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing of confidential information and documents differently than non-confidential information and documents.

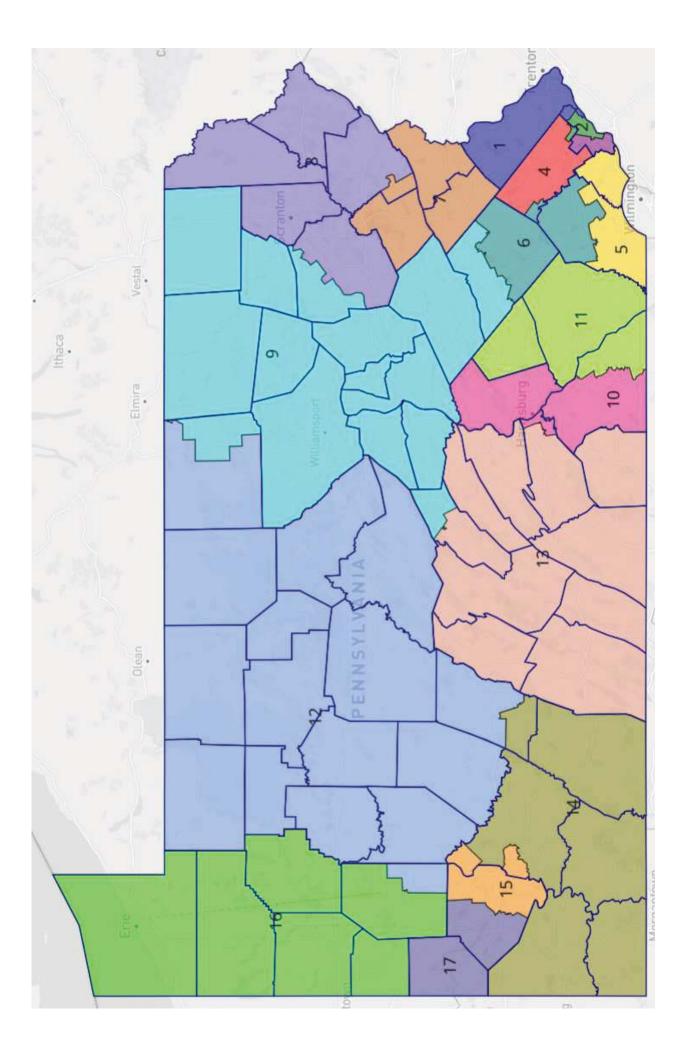
> <u>/s/ John P. Lavelle, Jr.</u> John P. Lavelle, Jr. (Pa. ID No. 5427)

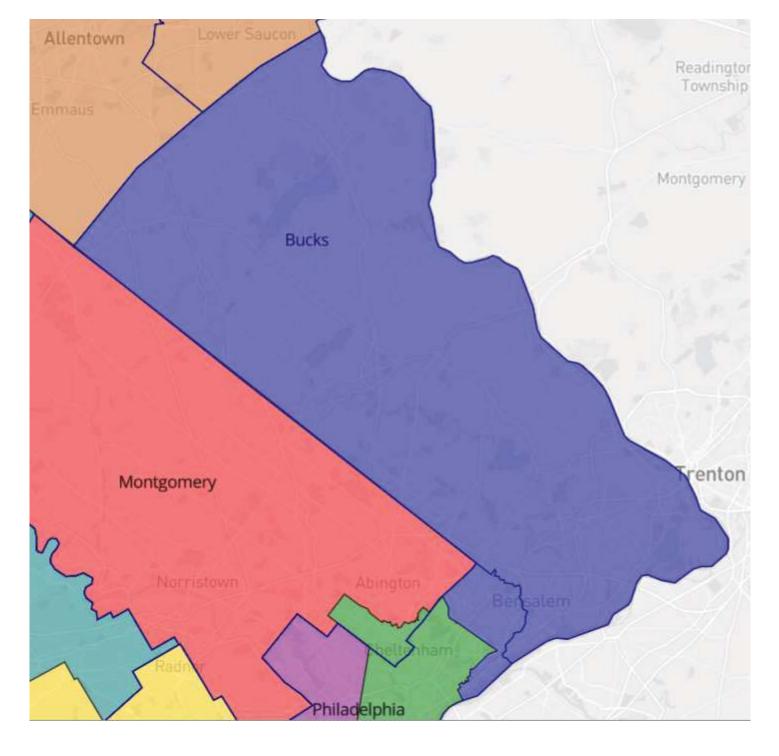
PROOF OF SERVICE

On January 24, 2022, I caused a copy of the foregoing to be served on all counsel of record, pursuant to the Court's instructions, via the email address <u>CommCourtFiling@pacourts.us</u>.

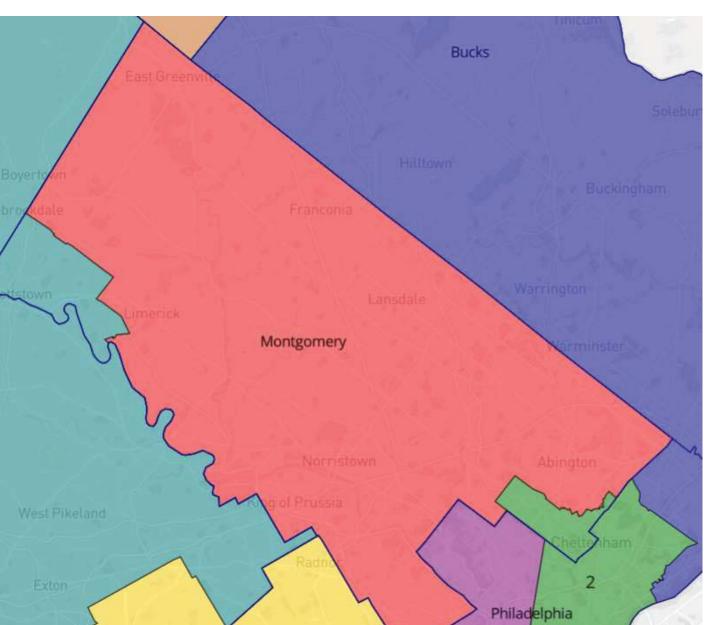
<u>/s/ John P. Lavelle, Jr.</u> John P. Lavelle, Jr. (Pa. ID No. 54279) 1701 Market Street Philadelphia, PA 19103-2921 +1.215.963.5000 john.lavelle@morganlewis.com

EXHIBIT A

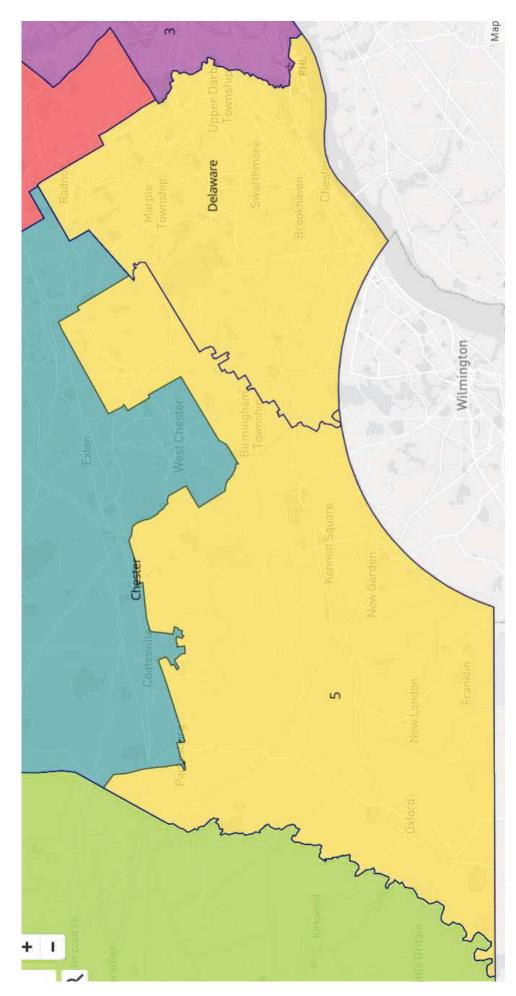


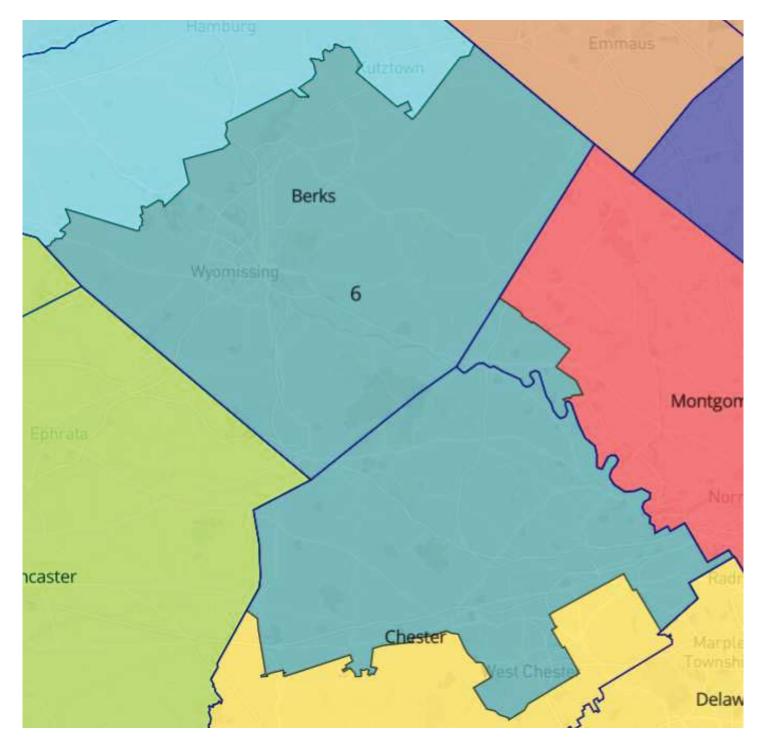


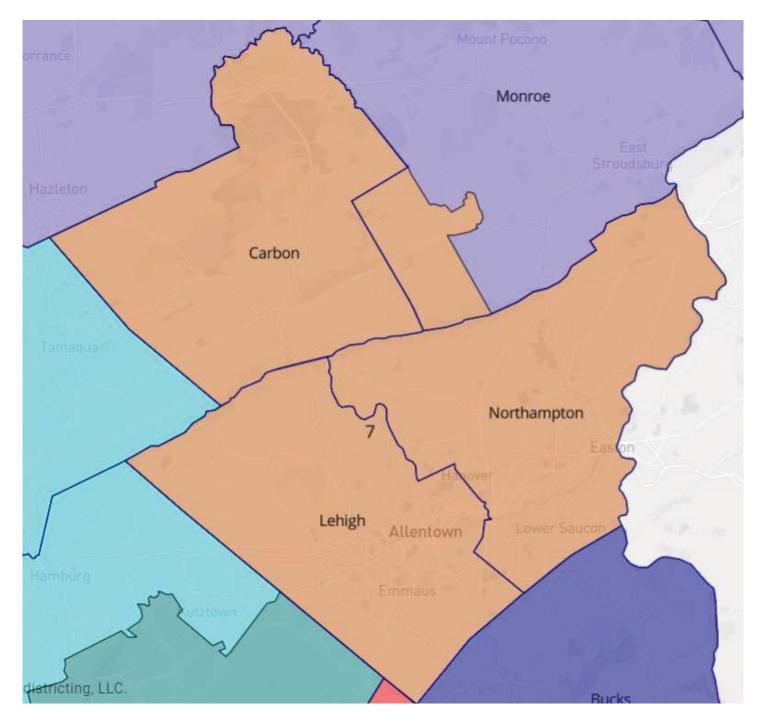




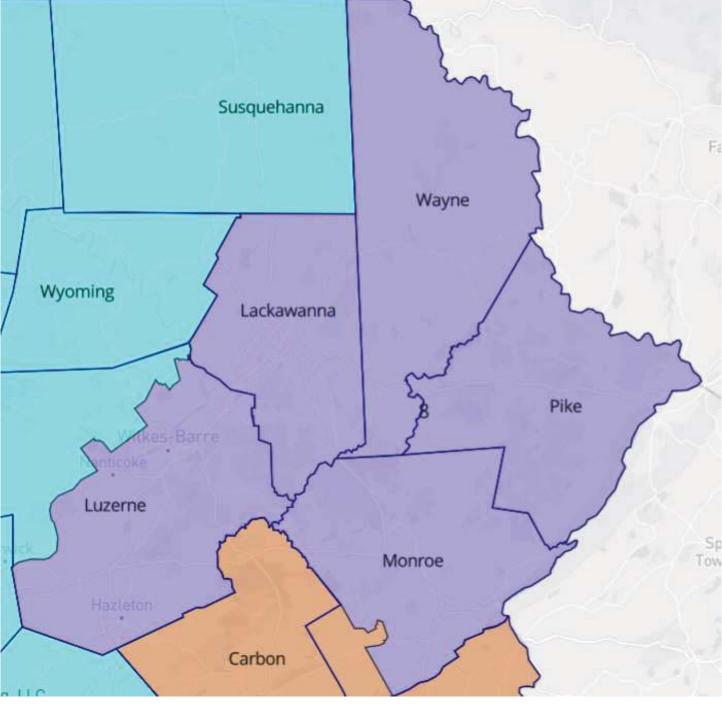
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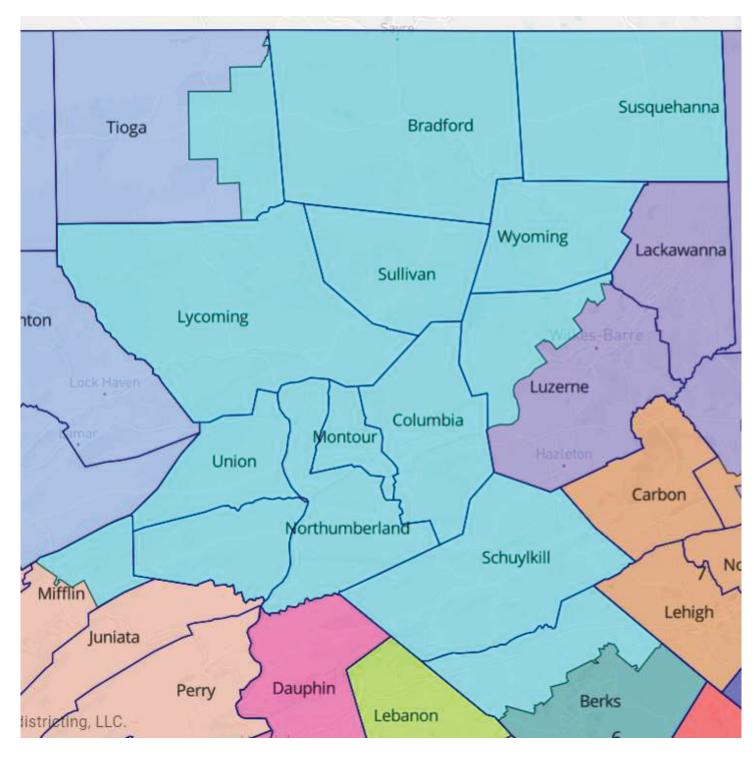


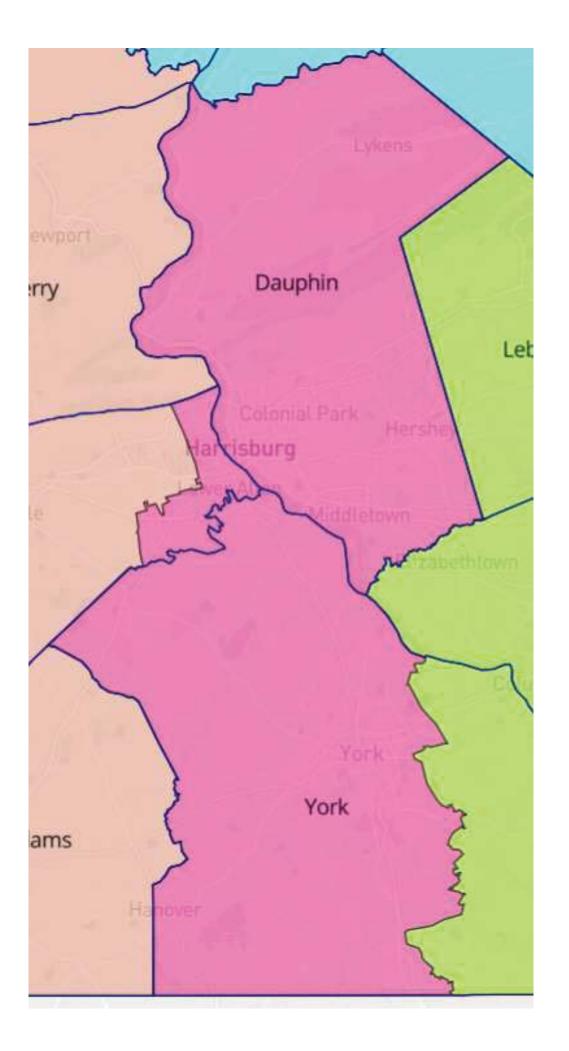


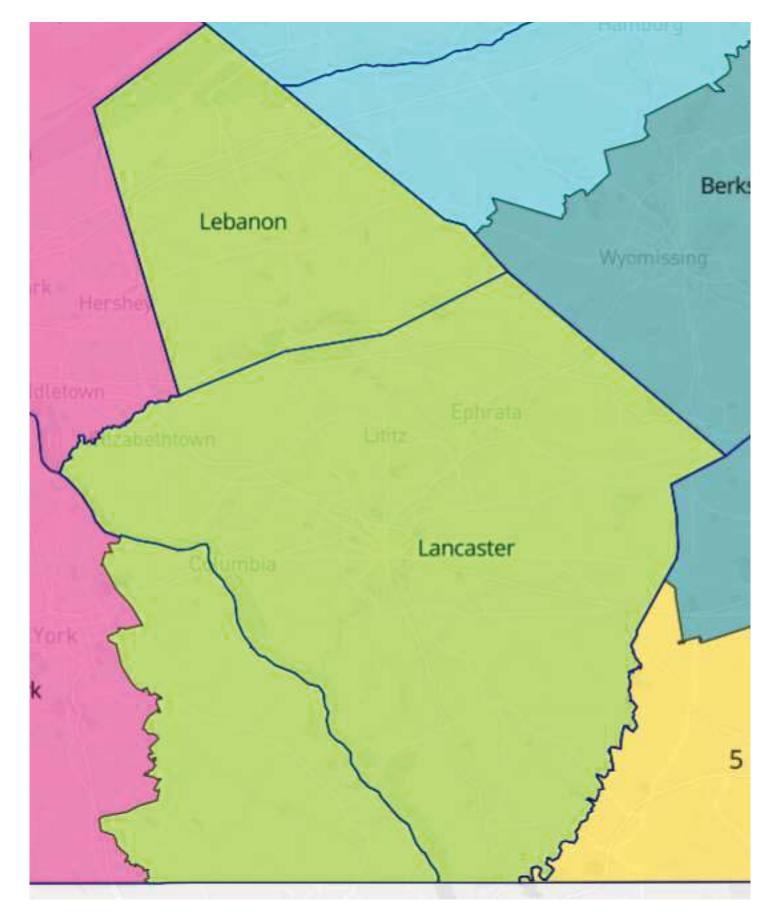


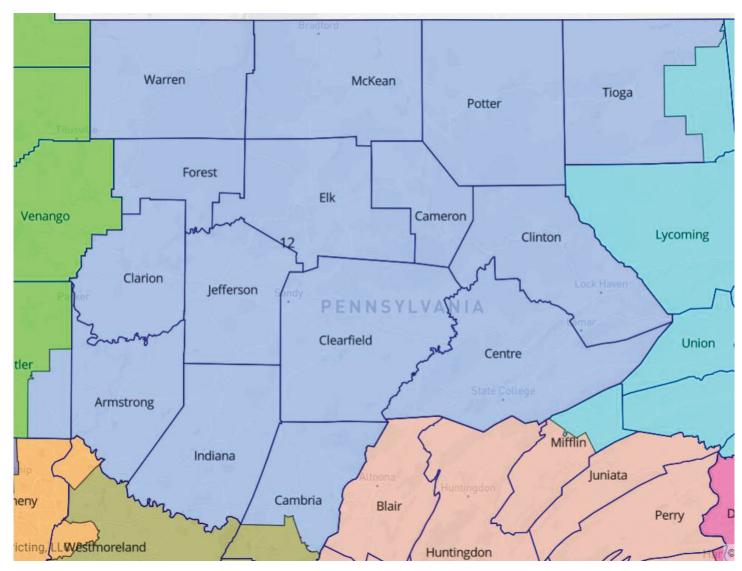


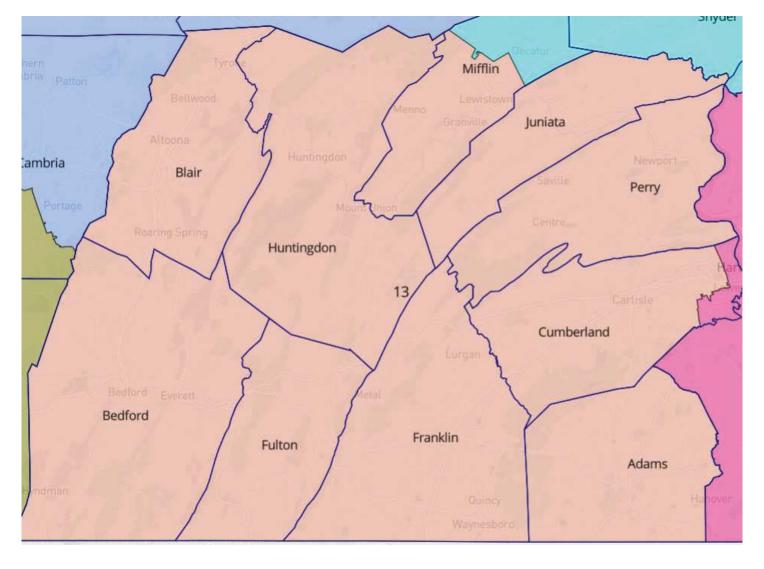




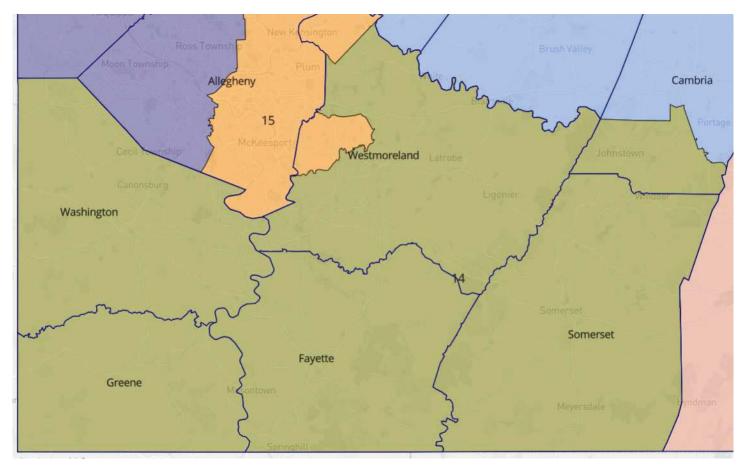


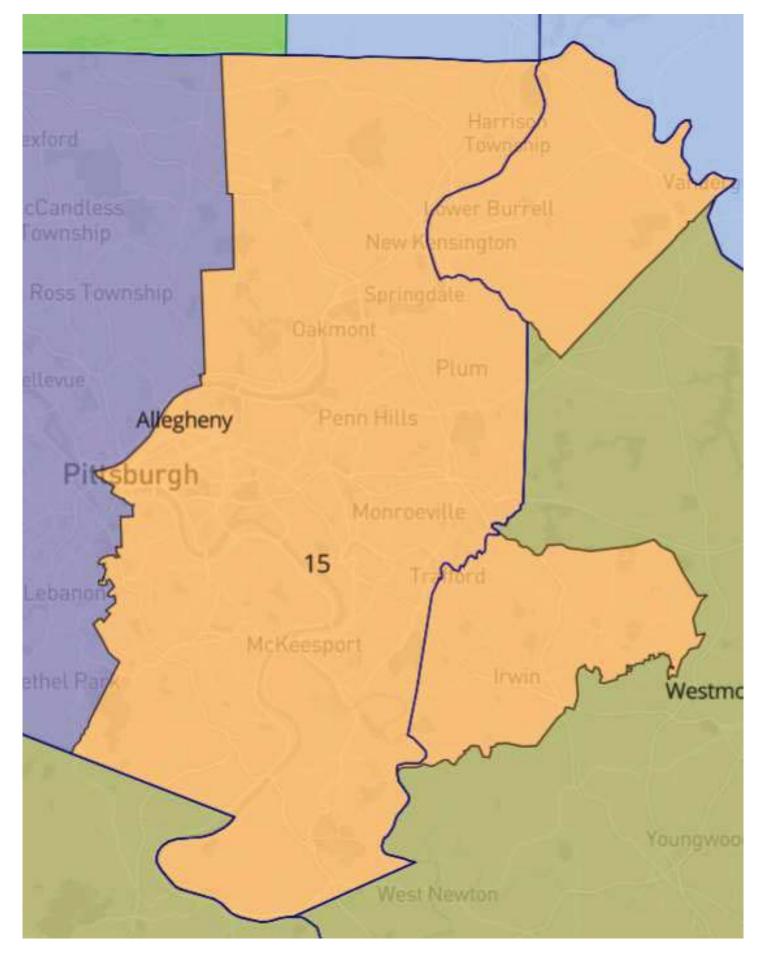




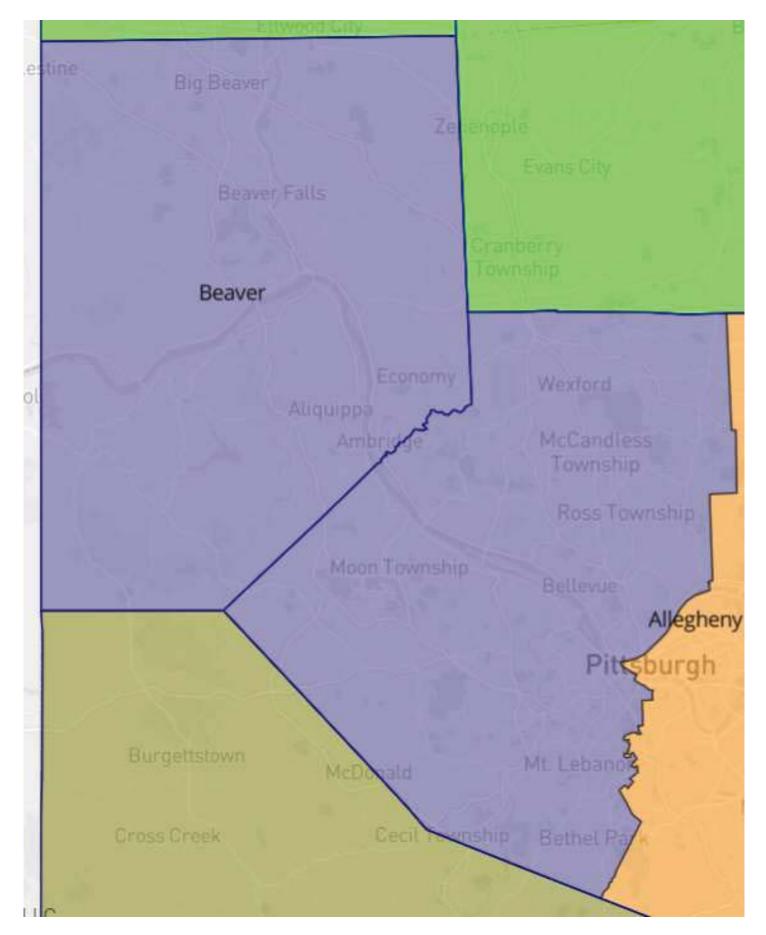












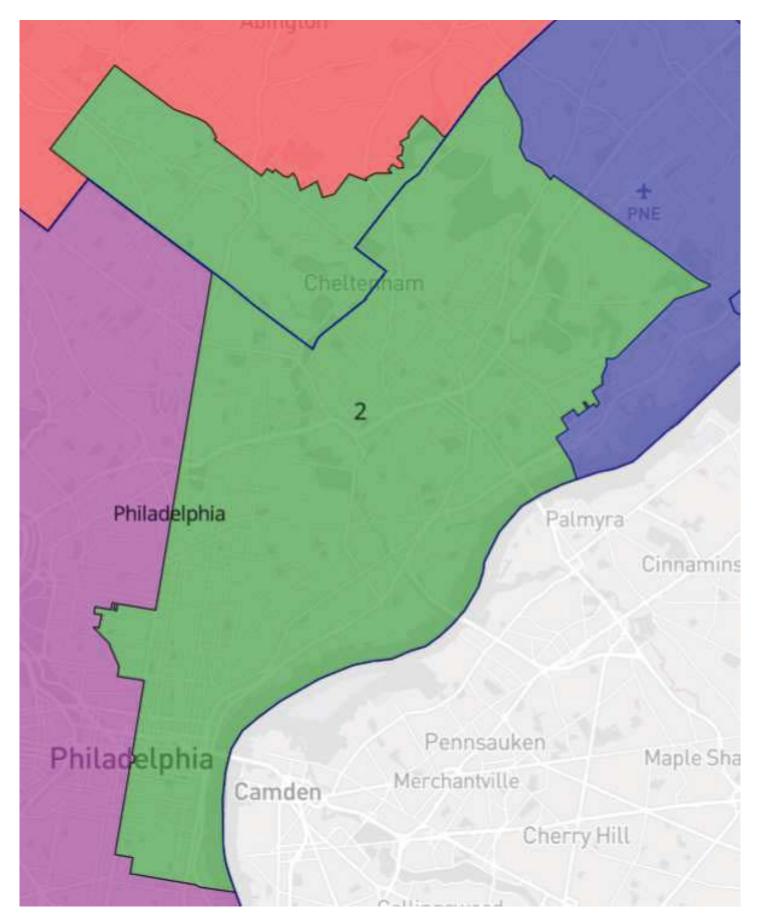


EXHIBIT B



The Story of the Pennsylvania Citizens' Map

January 2022

Statement of Justin Villere, Managing Director of Draw the Lines PA

I have been involved in the Draw the Lines PA ("DTL") Community Map project since December 2016. I organized or participated in almost every one of the 300+ in-person and virtual events held by DTL across the Commonwealth since 2017. I oversaw DTL's five bi-annual public mapping competitions from 2018-2021. Along with other judges who participated, I personally reviewed every one of the 1,500 maps that were submitted by Pennsylvanians. I managed DTL's relationship with Azavea, the Philadelphia-based GIS firm that created DistrictBuilder, the software platform primarily used for DTL's competitions. I also manage the DTL Citizen Map Corps, a group of 40 Pennsylvanians from across the Commonwealth who have won DTL competitions and proven to be extraordinary citizen mappers.

Previously, I worked as a director of a Philadelphia-based nonprofit from 2012-2016. I have a B.A. in History and Communication from the University of Colorado at Boulder, and a Master's in Public Administration from Cornell University.

Background on the Map

The Pennsylvania Citizens' Map is a composite map of 17 congressional districts in Pennsylvania that represent the efforts and mapping values of 7,211 Pennsylvanians from 40 of Pennsylvania's 67 counties– representing 90% of the Commonwealth's population– who participated in five Draw the Lines¹ public competitions held since 2018. Draw the Lines is a civic engagement project developed and hosted by the Committee of Seventy, Pennsylvania's oldest and largest 501c3 nonpartisan good government group.

Draw the Lines was created in October 2016 by longtime journalist and civic engagement consultant Chris Satullo and Seventy CEO David Thornburgh. Thornburgh continues to serve as DTL Chair. I have served as project manager and then managing director of Draw the Lines almost since its inception. During the competitions, the work of DTL was guided by three regional Steering Committees: West (chaired by former US Attorney Fred Thiemann and former Superior Court Judge Maureen Lally-Green); Central (chaired by former state Senator Mike Brubaker and Sandy Strauss, Director of Advocacy for the PA Council of Churches); and East (chaired by former PA Governor Mark Schweiker and CEO of the Urban Affairs Coalition Sharmain Matlock-Turner). The effort was funded almost exclusively by Pennsylvania foundations.

¹ DRAW THE LINES PA, <u>https://drawthelinespa.org/</u> (last visited Jan. 24, 2022).

DTL competitions were open to anyone in Pennsylvania, and participants ranged from 13 yearold high school freshmen to college students from institutions across PA to senior citizens. Considering that each mapper, on average, spent three hours drawing a map, their collective effort added up to almost 22,000 hours, the equivalent to one person working full time for almost ten years. While other states have conducted such experiments in citizen engagement in redistricting, Draw the Lines PA involved roughly 10 times more citizens than any other state in history.

Draw the Lines citizen mappers completed and submitted 1,500 congressional maps (many maps were submitted by teams, and not all participants ended up completing maps). Each of these 1,500 maps were drawn and scored on common mapping metrics using free online software (District Builder² and Dave's Redistricting³). The statistical averages for these maps became benchmarks by which to draw the Citizens' Map (see below), as did the values that mappers declared important to them (prior to drawing and submitting a map citizen mappers were asked to prioritize the values and criteria they were attempting to represent in their map).

In the summer of 2020, about forty of the most skilled and active Draw the Lines citizen mappers were organized into a Citizen Map Corps, which has met monthly between then and now. With the benefit of their energetic and skilled involvement and insights, Draw the Lines published the original version of the Citizens' Map in September 2021. The map was accompanied by an extensive narrative that explained, district by district, the choices and tradeoffs embedded in the map. After the map was released, citizens were encouraged to make comments on the DTL website on what they liked and didn't like about the map. Draw the Lines received 116 comments on the map. After taking those recommendations under advisement, Draw the Lines then produced a second, final version of the map.

The Citizens' Map, in effect, represents the values of everyday Pennsylvania mappers more than any other map that has been published or considered. Further, by using direct hands-on public involvement to draw the original map, publishing the map, asking for feedback, and then revising it, Draw the Lines has modeled a transparent and accountable public process. The Citizens' Map is not a perfect map but it represents what our thousands of mappers and a clear majority of public commenters would want to see in their congressional maps.

Among the mapping criteria prioritized are those contained in the landmark 2018 Pennsylvania Supreme Court decision overturning PA's 2011 congressional maps. Accordingly, it uses the current map that resulted from that case as a general starting place.

A note on data and software

The Citizens' Map uses the 2020 PL 94-171 dataset produced by the U.S. Census Bureau in August 2021. It is unadjusted data; it does not adjust prisoner locations to their place of home address prior to incarceration.

² DISTRICT BUILDER, <u>https://www.districtbuilder.org/</u> (last visited Jan. 24, 2022).

³ DAVE'S REDISTRICTING, <u>https://davesredistricting.org/maps#home</u> (last visited Jan. 24, 2022).

The map was drawn on the free and publicly available Dave's Redistricting App.

Values prioritized by citizen mappers

Each mapper chose up to three values that they prioritized in their map. Draw the Lines totaled which values appeared as priorities most frequently. Equal population and contiguity are two requirements of any map and thus were not included.

1st	Compactness
2nd	Competitive elections
3rd	Communities of interest
4th	Minority representation
5th	Limiting jurisdictional splits
6th	Party advantage
7th	Incumbent protection

It's important to note that giving unfair advantage to any particular party or incumbent were not only near-universally ranked behind the other values, but people actively dismissed them as goals. It is clear that Pennsylvanians want partisan fairness in their maps.

The Metrics of the Citizens' Map

Equal population: It is standard practice that congressional districts have the exact same number of people, down to the person, to avoid court challenges on the basis of "one person, one vote." This map has a total deviation of one person.

Contiguous and compact: Two values that mattered significantly to DTL mappers were contiguous and compact districts, two values cited by the State Supreme Court as necessary and codified in the PA Constitution for state legislative districts. Each district is contiguous in the Citizens' Map. Further, it achieves a 38% Polsby-Popper (PP) compactness score. The median PP score of the 1,500 congressional maps produced by DTL mappers was 33%. This map significantly improves upon the 16% mark from the discarded 2011 maps. It also exceeds the 33% PP mark of the 2018 map. If one uses a different compactness measurement, Reock, this map is slightly better than the 2018 map - 45% to 43%, respectively.⁴

⁴ For more information regarding the differences between the Polsby-Popper and Reock measurements, see Daniel McGlone, *Measuring District Compactness in PostGIS*, AZAVEA (Jul. 11, 2016) <u>https://www.azavea.com/blog/2016/07/11/measuring-district-compactness-postgis/</u>.

Polsby-Popper	37.6%		
Schwartzberg	1.67		
Reock	45.1%		
Convex Hull	0.81		
Population Polygon	0.77		

Further compactness measurements were calculated by redistricting expert Moon Duchin.⁵

Jurisdictional splits: While limiting jurisdictional splits was not a top-3 priority for our mappers, it was cited by the State Supreme court in 2018 as necessary. Minimizing splits has a number of benefits: ease of election administration for county officials, limiting confusion among residents of who their elected officials are, and enabling communities to vote with a unified voice. This map splits 14 counties a total of 16 times, equal to the 14/16 split by the 2018 map and far superior to the 28 counties split 38 times in the 2011 map. It also takes pains to minimize splitting municipalities. It splits 16 municipalities, an improvement on the 19 splits in the 2018 map. Some municipal splits are unavoidable due to size (like Philadelphia), or due to the zero population deviation requirement. Other splits (like Pittsburgh) were the result of trade-offs to maximize other values (like communities of interest, compactness, and political competitiveness).

Compliance with the Voting Rights Act: To adhere to the Voting Rights Act, Districts 2 and 3 are majority-minority districts. District 2 is a coalition district (29% Black, 22% Hispanic, 10% Asian), while District 3 is majority Black (55%). A few DTL mappers created a third majority-minority district in their own maps, and others aimed to achieve a 37% single-minority population in additional districts; this figure has been cited as a baseline for giving a racial minority a chance to elect the candidate of their choice while maximizing their voting power in other districts.⁶ However, doing so on the Citizens' Map would have had ripple effects on compactness, splits, and regionality.

Competitiveness: Throughout the Draw the Lines competitions, Pennsylvanians stated that they valued districts that created competitive elections. The Citizens' Map, using 2016-2020 composite election data, would yield five strongly Democratic and six strongly Republican districts. Six districts would produce competitive elections (major party candidates within 10% of each other). This exceeds the median that DTL mappers were able to produce (four competitive districts), plus the four elections that would be classified as competitive under this standard in 2018 and 2020. The 2011 map was notoriously uncompetitive—only three races total between 2012-2016 finished with candidates within 10% of each other.

Partisan fairness: Our mappers were almost unanimous in placing partisan advantage last when ranking the values that define a map. Accordingly, this map rates well on "proportionality,"

⁵ See Draft Plans, PENNSYLVANIA REDISTRICTING PUBLIC COMMENT PORTAL, <u>https://portal.pennsylvania-mapping.org/plans</u> (last visited Jan. 24, 2022).

⁶ See, e.g., Ryan P. Haygood, *The Dim Side of the Bright Line: Minority Voting Opportunity After Bartlett v. Strickland*, HARV. CIV. RIGHTS – C.L. L. REV. at 10 (Feb. 25, 2010), https://harvardcrcl.org/wp-content/uploads/sites/10/2010/02/HaygoodFinalFINAL.pdf.

meaning that if either party were to win 50% of the statewide vote, they would win 8-9 seats if the map were perfectly proportional.

PlanScore, which evaluates maps for partisan fairness, gives two readings on the efficiency gap metric.⁷ When not factoring in the status of incumbents, PlanScore gives the Citizens' Map an efficiency gap of 3.5% in favor of Republicans.⁸ This means Republicans would win an extra 3.5% of 17 seats, or an extra half-seat. When factoring incumbency, there is a 0.2% gap in favor of Republicans.⁹ For reference, the overturned 2011 map was +19% R¹⁰ (worth about 3 extra seats) and the 2018 remedial map was +3% R.¹¹

Incumbency: While the locations of incumbent members of Congress was a value roundly rejected by DTL mappers, the Citizens' Map does partially consider these locations. This map attempts to balance the value of "wiping the slate clean" with the understanding that dramatically altering the previous map and moving congresspersons around to new districts could be disruptive to representation.

					Averages,
			HB 2146, passed		individual DTL
	2011	2018	House	PA Citizens' Map	mappers
Counties Split	28 (38 times)	14 (18 times)	15 (18 times)	14 (16 times)	57 times
Municipalities					
Split	68	19	13	16	NA
Precincts Split	19	32	8	23	NA
Compact, Reock	34%	46%	38%	45%	NA
Compact, Polsby-					
Popper	16%	33%	31%	38%	33%
Competitive					
districts	1	4	5	6	4
Efficiency Gap	+19.0% R	+ 1.9% R	+7.1% R	+ 2.2% R	NA
Pop. Deviation	1	1	1	1	6,276
Maj-Min Districts	2	2	2	2	2

⁷ Eric Petry, *How the Efficiency Gap Works*, BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW (last visited Jan. 24, 2022), https://www.brennancenter.org/sites/default/files/legal-work/How the_Efficiency_Gap_Standard_Works.pdf.

⁸ CitizensMap_revised.geojson, PLANSCORE (last updated Jan. 12, 2022), https://planscore.campaignlegal.org/plan.html?20220112T114256.829958524Z.

⁹ *İd.*

¹⁰ 2012-2016 Redistricting Plan, PLANSCORE (last visited Jan. 24, 2022),

https://planscore.campaignlegal.org/pennsylvania/#!2012-plan-ushouse-eg.

¹¹ 2018-2020 Redistricting Plan, PLANSCORE (last visited Jan. 24, 2022), https://planscore.campaignlegal.org/pennsylvania/#!2018-plan-ushouse-eg.

* Maps drawn by DTL mappers used 2010 Census data, and up until 2020 the mapping platform was only able to draw districts down to the census tract level, rather than voting precincts. This explains the high county split and population deviation metrics.

District-by-District Descriptions

The notion of "communities of interest" was important to DTL mappers as well. Any redistricting process that faithfully attempts to receive and incorporate public feedback is essentially seeking clarification from residents about important aspects of their communities that otherwise may not be known or apparent to map makers. This map attempts to demonstrate the most frequent regions of interest or other considerations of import to Pennsylvanians (e.g., geographic features) that our mappers have represented over the last three years.

District 1: Bucks County has been held together within a single district since the 1930s, and the majority of DTL maps did the same. The Citizens' Map does as well. To meet the population requirement, it dips into northeastern Philadelphia, as the character and culture of southern Bucks is quite similar to Wards 58, 65, and 66 in Philly.

The First District is composed of all of Bucks County and part of Philadelphia County consisting of the city of Philadelphia Wards 58 and 66 and part of Ward 65 (full precincts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 20, 23), and parts of Precinct 12 (Blocks 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1071, 1010, 1011, 1012, 1013, 1014, 1015, 1020, 1021, 1022, 1023, 1024, 1025, 3000, 3001, 3002, 3003, 3004, 3010, 4003), Precinct 14 (Blocks 1020, 4010, 4011,4012, 4013), Precinct 15 (Block 1016), and Precinct 16 (Blocks 1001, 1002, 1003, 2000).

District 2: CD2 is made up of the rest of Northeast Philadelphia, over to Broad Street, and then down to the Pennsport neighborhood in South Philly. DTL mappers frequently used Broad Street as a clean dividing line, and this largely mirrors the 2018 map. The Citizens' Map takes care not to split Temple University, incorporating Wards 32 and 47. This trade-off ensures the second largest university in the Commonwealth is held together. It also includes Cheltenham and a part of Abington Township in Montgomery County. CD2 is a minority coalition district, with the voting-age population being 61% BIPOC.

The Second District is composed of part of Philadelphia County consisting of the city of Philadelphia Wards 1, 2, 5, 7, 14, 18, 19, 20, 23, 25, 31, 33, 35, 37, 41, 42, 43, 45, 47, 49, 53, 54, 55, 56, 57, 61, 62, 63, 64. It has part of Ward 32, including full precincts 2, 5, 6, 7, 8, 9, 11, 12, 13, 15, 29, and part of Precinct 14 (Blocks 1004, 1006, 1007, 1008), Part of Precinct 16 (Blocks 2003, 2007, 2008). It has part of Ward 65 (full precincts 13, 17, 18, 19, 21, 22) and part of Precinct 12 (Blocks 1019, 3004, 3009, 3019), Precinct 14 (Blocks 4008, 4009), Precinct 15 (Blocks 1018, 1019, 4005, 4006, 4007), and Precinct 16 (Blocks 1004, 1005, 1006, 1007, 1010, 1011, 1012, 1013, 1014, 1015, 1017). It also has part of Montgomery County consisting of the townships of Cheltenham and Rockledge, plus part of the township of Abington (Ward 4, Districts 1 and 2, plus part of Ward 3, District 1 (Blocks 2000, 2001, 2006, 2007, 2008, and 2016) and part of Ward 3, District 2 (Block 2010).

District 3: CD3 contains Northwest, West, and much of South Philadelphia. CD3 is a majorityminority district, with Black voting-age residents making up 55% of the population.

The Third District is composed of part of Philadelphia County consisting of the city of Philadelphia Wards 3, 4, 6, 8, 9, 10, 11, 12, 13, 15, 16, 17, 21, 22, 24, 26, 27, 28, 29, 30, 34, 36, 38, 39, 40, 44, 46, 48, 50, 51, 52, 59, 60, and part of Ward 32 (full precincts 1, 3, 4, 10, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 30, 31, and part of Precinct 14 [Block 1005] and Precinct 16 [Blocks 2004, 2009]).

District 4: District 4 centers on the majority of Montgomery County. The region's population growth, particularly in Montgomery County, meant that behind Philadelphia, it was the most logical district to maintain a second split. Thus, the Pottstown and Pottsgrove area in the northwest (to CD6) and Cheltenham/part of Abington (CD2) are the only Montgomery County municipalities not included in CD4.

The Fourth District is composed of part of Montgomery County consisting of Ambler, Bridgeport, Bryn Athyn, Collegeville, Conshohocken, Douglass township, East Greenville, East Norriton, Franconia, Green Lane, Hatboro, Hatfield Borough, Hatfield Township, Horsham, Jenkintown, Lansdale, Lower Frederick, Lower Gwynedd, Lower Merion, Lower Moreland, Lower Providence, Lower Salford, Marlborough, Montgomery Township, Narberth, New Hanover, Norristown, North Wales, Pennsburg, Perkiomen, Plymouth Township, Red Hill, Royersford, Salford, Schwenksville, Skippack, Souderton, Springfield township, Telford, Towamencin, Trappe, Upper Dublin, Upper Frederick, Upper Gwynedd, Upper Hanover, Upper Merion, Upper Moreland, Upper Providence Township, Upper Salford, West Conshohocken, West Norriton, Whitemarsh, Whitpain, Worcester. It also contains part of Abington, Ward 3, District 2 (Blocks 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2011, 2012, 2013, 2014, 2015, 2017, 2018, 2019, 2020, 2021, 2022, 4004, 4005, 4009) and Ward 2, District 1 (Blocks 1000, 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1009, 1010, 1011, 1012, 1013, 1014, 2000, 2001, 2002, 3010, 3011). It also contains part of Limerick, Districts 1, 2, 4, 5, 6 and part of District 3 (Blocks 1002, 1003, 1004, 1005, 1007, 1008, 1009, 1010, 1011, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 3005, 3016, 3017, 3019, 3020, 3021).

District 5: District 5 contains all of Delaware County and the southern part of Chester County. DTL mappers were divided on pairing Delaware County with Chester or with south Philly by the airport (as was done in the 2018 map). Due to trade-offs elsewhere in the map (mainly by including Berks with Chester County), the Citizens' Map now pairs two of the faster growing counties in PA.

The Fifth District is composed of all of Delaware County and part of Chester County consisting of Atglen, Avondale, Birmingham township, East Fallowfield township, East Goshen, East Marlborough, East Nottingham, Elk township, Franklin township, Highland township, Kennett, Kennett Square, London Britain, London Grove, Londonderry township, Lower Oxford, Malvern, New Garden, New London, Newlin, Oxford borough, Penn township, Pennsbury, Pocopson, Thornbury township, Upper Oxford, West Bradford, West Fallowfield township, West Grove, West Marlborough, West Nottingham, West Sadsbury, Westtown, Willistown. It also contains parts of Parkesburg Precinct South (Blocks 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2023, 2024, 2028, 2029, 2030, 2031, 2032, 2033, 2035, 2036, 2037, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060.)

District 6: Northern Chester County and the majority of Berks County (including Reading) are joined together in District 6. After being split among four districts in the 2011 map and three in the 2018 map, Berks County is only split once in the Citizens' Map. DTL mappers frequently matched Berks with Chester in their maps. An additional round of public comments spurred DTL to include South Coatesville with Coatesville in CD6.

The Sixth District is composed of part of Berks County consisting of Alsace, Amity township, Bally, Bechtelsville, Bern, Birdsboro, Brecknock township, Boyertown, Caernarvon township Colebrookdale, Cumru, District, Douglass township, Earl township, Exeter township, Fleetwood, Hereford, Kenhorst, Laureldale Leesport, Longswamp, Lower Alsace, Lower Heidelberg, Lyons, Maidencreek, Mohnton, Mount Penn, Muhlenberg, New Morgan, Oley, Ontelaunee, Pike township, Reading city, Robesonia, Robson, Rockland township, Ruscombmanor, Shillington, Sinking Spring, South Heidelberg, Spring township, St. Lawrence, Topton, Union township, Washington township, Wernersville, Wyomissing, and parts of Richmond township not listed in the description for District 9, and parts of Heidelberg township not listed in the description for District 9.

It contains part of Montgomery County consisting of Lower Pottsgrove, Pottstown, Upper Pottsgrove, West Pottsgrove, and part of Limerick District 3 not listed in the description of District 4.

District 6 contains part of Chester County consisting of Caln, Charlestown, Coatesville, Downingtown, East Bradford, East Brandywine, East Caln, East Coventry, East Nantmeal, East Pikeland, East Vincent, East Whiteland, Easttown, Elverson, Honey Brook borough, Honey Brook township, Modena, North Coventry, Phoenixville, Sadsbury township, Schuylkill township, South Coatesville, South Coventry, Spring City, Tredyffrin, Upper Uwchlan, Uwchlan, Valley township, Wallace, Warwick Township, West Brandywine, West Caln, West Chester, West Goshen, West Nantmeal, West Pikeland, West Vincent, West Whiteland, and part of Parkesburg (all of North precinct, and part of South precinct not named in the description for District 5).

District 7: District 7 couples Lehigh and Northampton County, which together comprise the Lehigh Valley. This was one of the most common groupings of any two counties in DTL maps. CD7 includes Carbon County and a part of Monroe, which mirrors those communities' connections via the Northeast Extension (I-476). DTL fielded public comments about including the Stroudsburg area with District 7, but there was not a clear consensus.

The Seventh District is composed of Lehigh County, Northampton County, Carbon County, and parts of Monroe County consisting of Polk township, Eldred Township, and part of Chestnut Hill (District 3, blocks 2005, 2025, 3021, 3022, 3023, 3027).

District 8: District 8 is anchored by Scranton/Wilkes-Barre, which DTL mappers from this area often took pains to keep together, along with Hazleton. DTL heard from residents that combining Lackawanna and Luzerne Counties with Pike and Monroe Counties brings together two clear communities (the SWB metro area and the Pocono commuter rim). It also includes Wayne County.

The Eighth District is composed of Pike County, Wayne County, Lackawanna County, and parts of Monroe County consisting of Barret, Coolbaugh, Delaware Water Gap, East Stroudsburg, Hamilton township, Jackson township, Middle Smithfield, Mount Pocono, Paradise townhip, Pocono, Price, Stroud, StroudsburgTobyhanna, Tunkhannock township, and all parts of Chestnut Hill not named in the description in district 7. It also includes parts of Luzerne County including Ashley, Avoca, Buck, Bear Creek, Bear Creek Village, Black Creek, Butler township, Conyngham borough, Conyngham township, Courtdale, Dennison, Dorrance, Dupont, Duryea, Edwardsville, Exeter borough, Fairview township, Forty fort, Foster township, Freeland, Hanover township, Hazle, Hazleton, Hollenback, Hughestown, Jeddo, Jenkins, Kingston borough, Kingston township, Laflin, Larksville, Laurel Run, Luzerne borough, Nanticoke, Nescopeck borough, Nescopeck township, Newport township, Nuangola, Penn Lake Park, Pittston city, Pittstown township, Plains, Plymouth borough, Plymouth township, Pringle, Rice, Slocum, Sugar Notch, Sugarloaf township, Swoyersville, Warrior Run, West Hazleton, West Pittston, West Wyoming, White Haven, Wilkes-Barre city, Wilkes-Barre township, Wright, Wyoming, and Yatesville, and part of Exeter township (all blocks not listed in the description for District 9 within Exeter).

District 9: District 9 groups northern tier counties with some of their more southern counterparts that share cultural characteristics. It keeps the Susquehanna Valley together, a recognized region with counties containing common cultural and economic interests (Columbia, Union, Snyder, Montour, Northumberland). It also comes close to the municipal limits of the Wilkes-Barre area. The current 9th District is one of the districts most likely to change as population shifts away from the northern and central parts of the state, towards south central and southeast.

The Ninth District is composed of Bradford, Columbia, Lycoming, Montour Northumberland, Schuylkill, Snyder, Sullivan, Susquehanna, Union, Wyoming Counties, and part of Luzerne County including Dallas borough, Dallas township, Fairmount, Franklin township, Harveys Lake, Hunlock, Huntington township, Jackson township, Kutztown, Lake township, Lehman township, Lenhartsville, Maxatawny, New Columbus, Ross township, Salem township, Shickshinny, Union township and part of Exeter township (1000, 1001, 1002, 1003, 1004, 1005, 1006, 1009, 1010, 1011, 1012, 1013, 1014, 1015, 1024, 1034, 1045, 1046, 1047).

It includes part of Berks County including Albany township, Bernville, Bethel township, Centre township, Centerport, Hamburg, Greenwich, Jefferson township, Marion township North Heidelberg, Penn township, Perry township, Shoemakersville, Tilden, Tulpehocken, Upper Bern, Upper Tulpehocken, Windsor township, Womelsdorf, and parts of Heidelberg township (Blocks 3011, 3012, 3013, 3014, 3016, 3017), and parts of Richmond township, District 1 (Blocks 2007, 2011, 2014, 2018, 2023, 2030, 2031, 2032, 2033, 2051, 2052).

It includes part of Mifflin County, including Armagh township and Decatur township, and part of Brown township (Church Hill precinct, Blocks 1043 and 1044).

It includes part of Tioga County, including Blossburg, Covington township, Hamilton township, Mansfield, Putnam, Richmond township, Roseville, Rutland, Sullivan, Union township, Ward, and part of Jackson township (Blocks 1001, 1010, 1011, 1012, 1021, 1023, 1024, 1048, 1052, 1053, 1054, 1055.

District 10: District 10 is all of Dauphin and the western half of York County, including the city of York. There was no clear consensus among our mappers if York County should be attached to Lancaster County to the east or Adams County to the west. CD10 in the original Citizens' Map included Adams, York, and parts of Cumberland County. However, this created an awkward connection between half of Dauphin County (including Harrisburg) and some of the south-central counties with which it had little in common, like Bedford and Blair County. It was universally panned by Dauphin County residents, spurring the revision.

The tenth District is composed of Dauphin County and parts of York County including Carroll township, Codorus, Conewago township, Dallastown, Dillsburg, Dover borough, Dover township, East Manchester, Fairview township, Franklin township, Franklintown, Glen Rock, Goldsboro, Jackson township, Jacobus, Jefferson borough, Hanover borough, Heidelberg township, Lewisberry, Loganville, Manchester borough, Manheim township, Monaghan, Mount Wolf, Newberry, New Freedom, New Salem, North Codorus, North York, Paradise township, Penn township, Railroad, Red Lion, Seven Valleys, Shrewsbury borough, Shrewsbury township, Spring Garden, Spring Grove, Springettsbury, Springfield township, Warrington township, Washington township, West Manchester, West Manheim, West York, Wellsville, Winterstown, Yoe, York city, York Haven, York township, and part of North Hopewell not listed in the description for congressional District 11.

It contains part of Cumberland County, including Camp Hill East Pennsboro, Lemoyne, Lower Allen, New Cumberland, Shiremanstown, Upper Allen, Wormleysburg, and part of Mechanicsburg, including all of Ward 1 and part of Ward 2, Precinct 1 (Blocks 1031, 1032, 1033, 1034, 1035, 1036, 2015, 2017, 2018, 2019, 2020).

District 11: The Lancaster County Commissioners recently approved a resolution expressing the desire for the county to be held together during this process. The Citizens' Map respects that request. It also includes Lebanon County and the eastern half of York County.

The Eleventh District is composed of Lancaster and Lebanon Counties and parts of York County, including Chanceford, Crossroads, Delta, East Hopewell, East Prospect, Fawn Grove, Fawn township, Felton, Hallam, Hellam, Hopewell township, Lower Chanceford, Lower Windsor, Peach Bottom, Stewartstown, Windsor borough, Windsor township, Wrightsville, Yorkana, and parts of North Hopewell (Blocks 2007, 2008, 2009, 2013, 2014, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2030, 2031, 2032, 2034, 2035, 2036, 2037, 2038, 2044, 2045, 2046, 2047, 2050, 2051, 2052, 2055).

District 12: District 12 is another northern tier district, made up of much of the Pennsylvania Wilds. DTL hears frequently from Centre County and its Democratic-leaning electorate that they are tired of continually being grouped with more red counties surrounding it on all sides. However, this map is not able to address those concerns, as minimizing splits and creating a compact district became more relevant. Much of this district used to be 15th in the old map, which lost the most raw population from the last round of redistricting.

The Twelfth District is composed of the entirety of Armstrong, Cameron, Centre, Clarion, Clearfield, Clinton, Elk, Forest, Indiana, Jefferson, McKean, Potter, and Warren counties.

It contains part of Tioga County including Bloss, Brookfield, Charleston, Chatham, Clymer township, Deerfield township, Delmar, Duncan, Elk township, Elkland borough, Farmington township, Gaines, Knoxville, Lawrence township, Lawrenceville, Liberty borough, Liberty township, Middlebury, Morris township, Nelson, Osceola, Shippen township, Tioga borough, Tioga township, Wellsboro, Westfield borough, and Westfield township.

It contains part of Butler County including Buffalo township, Chicora, Clearfield township, Clinton township, Donegal township, East Butler, Jefferson township, Saxonburg, Winfield, and part of Summit township, including South District and the part of North District not named in the description for congressional district 16.

It contains part of Cambria County including Allegheny township, Asheville, Barr, Blacklick, Cambria, Carrolltown, Cassandra, Chest Springs, Chest township, Clearfield township, Cresson borough, Cresson township, Dean, East Carroll, Ebensburg, Elder, Gallitzin borough, Gallitzin township, Hastings, Jackson township, Lilly, Loretto, Muster, Nanty-Glo, Northern Cambria, Patton borough, Portage borough, Portage township, Reade, Sankertown, Susquehanna township, Tunnell Springs, Vintondale, Washington township, West Carroll, White township, Wilmore, and part of Summerhill township the entirety of the North District and part of the South District (Blocks 2005, 2009, 2010, 2011, 2016, 2017, 2018, 2019, 2021, 2022, 2023, 2024, 2025, 2026, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2037, 2038, 3000, 3008, 3010).

District 13: Broadly, District 13 is a grouping DTL saw from mappers who were very focused on geographic features in south central PA along mountain ranges and watersheds. It aims to keep together communities within the Allegheny Mountains and valleys region. In the original Citizens' Map, CD13 contained Harrisburg, but that created a widely disliked community-of-

interest split in the Capital Region between Districts 10, 11, and 13. The new District 13 includes Adams County and most of Cumberland.

The Thirteenth District is composed of the entirety of Adams, Bedford, Blair, Franklin, Fulton, Huntingdon, Juniata, and Perry counties. It contains part of Mifflin County, including Bratton, Burham, Derry township, Granville township, Kistler, Lewistown, McVeytown, Menno, Newton Hamilton, Oliver township, Union township, Wayne township, and part of Brown township, including the entirety of the Reedsville/Big Valley precinct and part of the Church Hill precinct not listed in the description for congressional district 9. It contains part of Cumberland County, including Carlisle, Cooke, Dickinson, Hampden, Hopewell township, Lower Mifflin, Lower Frankford, Middlesex township, Monroe township, Mount Holly Springs, Newburg borough, Newville, North Middleton, North Newton, Penn township, Shippensburg borough, Shippensburg township, Silver Spring Southampton township, South Middleton, South Newton, Upper Frankford, Upper Mifflin, West Pennsboro, and part of Mechanicsburg, including Ward 3, 4, 5, and part of Ward 2, including Precinct 2 and all of Precinct 1 not listed in the description for District 10.

District 14: District 14 combines the Laurel Highlands (Westmoreland, Fayette, Somerset), with Washington and Greene Counties in SW PA, that have similar history, interests, and culture. This was referenced by numerous citizens at a House State Government Committee hearing on this topic in Uniontown in August.¹² DTL mappers were generally more likely to include Somerset in a district with Bedford County and others to its east; however, due to population decline, to maintain a solid Southwestern PA district, District 14 in the Citizens' Map includes Somerset. It also includes Johnstown in Cambria County to meet the population requirement.

The Fourteenth District is composed of the entirety of Fayette, Green, Somerset, and Washington counties. It includes part of Westmoreland County, including Adamsburg, Arona, Avonmore, Bell township, Bolivar, Cook, Delmont, Derry borough, Derry township, Donegal borough, Donegal township, East Huntingdon, Export, Fairfield township, Greensburg, Hempfield township, Jeannette, Latrobe, Laurel Mountain, Ligonier borough, Ligonier township, Loyalhanna, Madison borough, Monessen, Mount Pleasant borough, Mount Pleasant township, Murrysville, New Alexandria, New Florence, New Stanton, North Belle Vernon, Oklahoma, Rostraver, Salem township, Seward, Smithton, South Greensburg, South Huntingdon, Southwest Greensburg, St. Claire township, Sutersville, Unity, Washington township, Youngstown, Youngwood, and part of Sewickley township, including districts East Herminie, Lowber, Sewickley, West Herminie, and Whyel, and part of the Rilton district (Blocks 1000, 1001, 1002, 1003, 1004, 1006, 1009, 1022, 1023, 1025, 1026, 1027, 1028, 1029, 1033, 1037, 1043).

¹² Christen Smith, *Pennsylvania's southwestern 14th Congressional District asks to stay whole*, Pittsburgh Post-Gazette (Aug. 26, 2021, 3:49pm), <u>https://www.post-gazette.com/news/politics-state/2021/08/26/Pennsylvania-s-southwestern-14th-Congressional-District-asks-to-stay-whole/stories/202108260157.</u>

It includes part of Cambria County, including Adams township, Brownstown, Conemaugh township, Croyle, Dale, East Conemaugh, East Taylor, Ehrenfeld, Ferndale, Geistown, Johnstown, Lower Yoder, Middle Taylor, Richland township, Scalp Level, Scottdale, Southmont, South Fork, Stonycreek township, Summerhill borough, Upper Yoder, West Taylor, Westmont, and part of Summerhill township, South District not listed in the description for District 12.

District 15: District 15 is composed of the eastern half of Allegheny County and extends into Westmoreland County. Pittsburgh is the anchor of this district. This district splits Pittsburgh, using the confluence of the three rivers and the Fort Pitt Bridge as a natural western boundary. It crosses over the Allegheny River to include much of the North Hills, like O'Hara and Fox Chapel. We heard from several public commenters that splitting Pittsburgh is not ideal. However, many of our mappers, including those in the area, used natural boundaries in the city to divide their districts, particularly at Point State Park where the Three Rivers come together. That's where the Citizens' Map divides Districts 15 and 17.

The Fifteenth District is composed of part of Allegheny County including Aspinwall, Baldwin borough, Blawnox, Brackenridge, Braddock, Braddock Hills, Brentwood, Chalfont, Cheswick, Churchill, Clairton, Dravosburg, Duquesne, East Deer, East McKeesport, Edgewood, Elizabeth borough, Elizabeth township, Fawn township, Forest Hills, Forward township, Fox Chapel, Frazer, Glassport, Harmar, Harrison township, Homestead, Indiana township, Jefferson Hills, Liberty borough, Lincoln borough, McKeesport, Monroeville, Mount Oliver, Munhall, North Braddock, North Versailles, O'Hara, Oakmont, Penn Hills, Pitcairn, Pleasant Hills, Plum borough, Port Vue, Rankin, Sharpsburg, South Park, South Versailles, Springdale borough, Springdale township, Swissvale, Tarentum, Trafford, Turtle Creek, Verona, Versailles, Wall, West Deer, West Homestead, West Mifflin, Whitaker, White Oak, Whitehall Borough, Wilkins, Wilkinsburg, Wilmerding, and part of Pittsburgh, including the entirety of Wards 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 29, 30, and 31, and part of Ward 32, including the entirety of District 8 (all blocks not listed in description for congressional district 17 for Ward 32, District 8).

It also includes parts of Westmoreland County including Allegheny township, Arnold, East Vandergrift, Hyde Park, Irwin borough, Lower Burrell, Manor borough, New Kensington, North Irwin, North Huntingdon, Penn borough, Penn township, Trafford, Upper Burrell, Vandergrift, West Leechburg, and part of Sewickley township, including part of the Rilton district not listed in the description for congressional District 14.

District 16: District 16: CD16 is anchored by Erie County, and then uses the I-79 corridor to connect Erie to counties south of it, down to Butler County. CD16 fairly closely resembles the current map. While unfortunate that this district splits Butler County, this was a trade-off for equal population purposes.

The Sixteenth District is composed of the entirety of Crawford, Erie, Lawrence, Mercer, Venango counties. It also contains part of Butler County, including Adams township, Allegheny township, Brady township, Bruin, Butler city, Butler township, Callery, Center township, Cherry township, Cherry Valley, Clay township, Concord township, Connequenessing borough, Connequenessing township, Cranberry township, Eau Claire, Evans City, Fairview borough, Fairview township, Forward township, Franklin township, Harrisville, Jackson township, Karns City, Lancaster township, Marion township, Mars, Mercer township, Middlesex township, Muddy Creek, Oakland township, Parker township, Penn township, Petriolia, Portersville, Prospect, Slippery Rock borough, Slippery Rock township, Valencia, Venango township, Washington township, West Liberty, West Sunbury, Worth township, Zelienople, and part of Summit township, including the North District Blocks 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2068, 2090, 2091, 3002, 3003, 3004, 3005, 3006, 3007, 3008, 3009, and 3010.

District 17: District 17 combines Beaver County with the western half of Allegheny County. A large number of mappers used the western part of Pittsburgh to give this district enough population, so as to limit splitting Washington County to the south (CD14) or Lawrence County (CD16) to the north. This district will also be one of the more heavily watched districts with regard to the 2022 election, with incumbent Conor Lamb running for Senate and creating a very close toss-up district.

The seventeenth District is composed of Beaver County and part of Allegheny County, including the entirety of Aleppo township, Avalon, Bell Acres, Bellevue, Ben Avon, Ben Avon Heights, Bethel Park, Bradford Woods, Bridgeville, Carnegie, Castle Shannon, Collier, Coraopolis, Crafton, Crescent, Dormont, Edgeworth, Emsworth, Etna, Findlay, Franklin Park, Glenfield, Glen Osburne, Green Tree, Hampton, Haysville, Heidelberg borough, Ingram, Kennedy, Kilbuck, Leet, Leetsdale, Marshall, McCandless, McKees Rocks, Millvale, Moon, Mount Lebanon, Neville, North Fayette, Oakdale, Ohio, Pennsbury Village, Pine township, Reserve, Richland township, Robinson township, Ross township, Rosslyn Farms, Scott township, Sewickley borough, Sewickley Heights, Sewickley Hills, Shaler, South Fayette, Stowe, Thornburg, Upper St. Clair, West View, and part of Pittsburgh, including the entirety of Wards 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, and part of Ward 32, District 4 (all blocks not listed in the description for congressional district 15), and part of Ward 32, District 8 (Blocks 6001, 6012, 6021).

Common Questions about the Citizens' Map

How does the map deal with going from 18 to 17 districts?

Removing a district has ripple effects across the state. As written elsewhere, the 2020 Census data shows that Pennsylvania's population has largely shifted south and east, impacting districts 1-7, 10, and 11.¹³ Conversely, seven current districts lost population relative to the 2010 Census, and will thus expand or shift geographically to meet the

¹³ See Sarah Anne Hughes, *4 takeaways from new Pa. census data and what it means for redistricting*, SPOTLIGHT PA (Aug. 18, 2021), <u>https://www.spotlightpa.org/news/2021/08/pa-redistricting-2020-census-data-takeaways/</u>.

target population. These were located in the Northern Tier, central PA, and much of western PA.

In the Citizens' Map, the districts that changed most significantly were the old Districts 12 and 15, focused on the northern tier and central PA. District 9, which bordered District 12 plus the growing districts in the southeast, saw significant change as well.

How does this map stack up to the 2011 map?

Achieving a zero population deviation with compact districts that make regional sense and minimize splits, while being politically fair, requires a number of tradeoffs and lessthan-ideal solutions.

That said, this map is far superior to the plan drawn in 2011 by the General Assembly, which was done in secret, without any public vetting or comment. It splits half as many counties (14 to 28), is more than twice as compact (37% Polsby-Popper, versus 16%), with six solidly competitive seats and fair representation (versus an average of one). It contains two majority-minority districts and has strong regional cohesion. Draw the Lines is confident that this map should be considered by whatever body draws PA's new congressional districts.

What changes were made between the original Citizens' Map and the revised version?

Pennsylvanians left 116 comments on the DTL website about the original map. One request appeared more than any other: the Capital Region was needlessly divided between three districts (10,11,13). Numerous commenters noted that Harrisburg has little in common with western counties like Blair and Bedford in CD13. The revised version keeps Dauphin County whole with much of York County in CD10, while including Adams County with the rest of CD13.

Commenters from Chester County were nearly unanimous in their feedback that Coatesville and South Coatesville should be kept together.

Lastly, the original Citizens' Map had a population deviation of four people. The revised version has a deviation of one person, in line with the most literal interpretation of the "One person, one vote" standard.

for the

Signed:

By: Justin Villere Title: Managing Director, Draw the Lines Date: January 24, 2022