

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A11-152

OFFICE OF
APPELLATE COURTS

DEC 09 2011

FILED

Sara Hippert, Dave Greer, Linda Markowitz,
Dee Dee Larson, Ben Maas, Gregg Peppin,
Randy Penrod and Charles Roulet, individually
and on behalf of all citizens and voting
residents of Minnesota similarly situated,

Plaintiffs,

Kenneth Martin, Lynn Wilson, Timothy O'Brien,
Irene Peralez, Josie Johnson, Jane Krentz, Mark
Altenburg, and Debra Hasskamp, individually and on
behalf of all citizens of Minnesota similarly situated,

Plaintiff-Intervenors,

**BRITTON, ET AL
PLAINTIFF-INTERVENORS'
RESPONSE TO PROPOSED
LEGISLATIVE PLANS**

Audrey Britton, David Bly, Cary Coop,
and John McIntosh, individually and on behalf
of all citizens of Minnesota similarly situated,

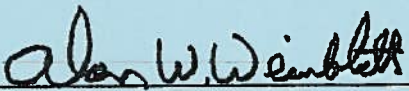
Plaintiff-Intervenors,

vs.

Mark Ritchie, Secretary of State of Minnesota; and
Robert Hiivala, Wright County Auditor, individually and
on behalf of all Minnesota county chief election officers,

Defendants.

Dated: December 9, 2011


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Introduction

This Court has authorized all parties to submit comments about and objections to legislative redistricting plans submitted by other parties because this action is, in fact, a litigation and because the Britton, et al. plaintiffs feel strongly that their proposed plan more closely meets constitutional requirements than do the other plans, this Response is respectfully submitted.

Oral argument time on January 4, 2012 is respectfully requested to explain any open issues.

I. Legal Argument

An initial and critical legal issue that this Court should consider in evaluating the parties' proposed plans of legislative redistricting is the relative priority to be afforded between small deviations from absolute population equality and the number of municipal splits resulting from adherence to that equality of population.

This Court's November 4, 2011 Order fixed a maximum deviation of $\pm 2\%$ from absolute equality. In doing so the Court acknowledged that:

Because a court-ordered redistricting plan must conform to a higher standard of population equality than a plan created by a legislature de minimis deviation from the ideal district must be the goal. (*citing Connor v. Finch*, 431 U.S. 407-414, 95 S.Ct. 1828, 1833 (1977).)

In *Connor*, the United States Supreme Court concluded that:

We do not reach all the complicated issues raised by the various appellants, because we have concluded that both the Senate and the House reapportionment ordered by the District Court fail to meet the most elemental requirement of the Equal Protection Clause in this area that legislative districts be "as nearly of equal population as is practicable." (internal citations omitted)

The Court used the word "practicable" not practical. That distinction is critical to this initial issue. The District Court in *Connor* had established a criteria that population variances were to be as "near de minimis as possible." *Connor, supra* at 413.¹

¹ "Practicable" is that which may be done or accomplished. Black's Law Dictionary, Sixth Edition at p. 1172. If it can be done (i.e., small deviations) it must be done.

Assuming, without agreeing, that Minnesota “policy” includes a limitation on splitting cities or townships or prefers a plan that does not do so,² any such policy must be subservient to the goal of population equality, not practically or mostly equal. *Connor, supra*. The Hippert plaintiffs’ “unchallenged reliance on [the state’s] historic policy against fragmented counties” is insufficient to overcome that requirement of equality. Indeed, none of the plans submitted totally avoid county or municipal splits. They can’t.

The fact that smaller deviations make drawing a plan more difficult is not grounds for allowing greater deviation. *Connor, supra* at fn. 18. The *Connor* court wrote:

The policy of maintaining the inviolability of county lines in such circumstances, if strictly adhered to, must inevitably collide with the basic equal protection standard of one person, one vote. Indeed, Mississippi’s insistent adherence to that policy resulted in the invalidation of three successive legislative apportionments as constitutionally impermissible. See *Connor v. Johnson*, 256 F.Supp. 962; *Connor v. Johnson*, 265 F.Supp. 492; *Connor v. Johnson*, 330 F.Supp. 506.

Recognition that a State may properly seek to protect the integrity of political subdivisions or historical boundary lines permits no more than “minor deviations” from the basic requirement that legislative districts must be “as nearly of equal population as is practicable.” *Roman v. Sincock*, 377 U.S., at 710, 84 S.Ct., at 1458; *Reynolds v. Sims, supra*, 377 U.S., at 577, 84 S.Ct., at 1390. The question is one of degree. In *Chapman v. Meier*, however, it was established that the latitude in court-ordered plans for departure from the Reynolds standards in order to maintain county lines is considerably narrower than that accorded apportionments devised by state legislatures, and that the burden of articulating special reasons for following such a policy in the face of substantial population inequalities is correspondingly higher.

² It is very difficult to ascertain any true state policy on this subject given the fact that the Minnesota legislature has not adopted a legislative redistricting plan signed by a governor since 1913. For almost 100 years the “assumption” made by the Britton, et al. plaintiffs “that the legislature and the Governor will not reach an agreement on redistricting legislation by February 21, 2012” (Order of Nov. 4, 2011 at p. 3) has been a correct assumption, thus not creating any real legislative policy on the subject of county or municipal splits.

The fact that a zero deviation goal creates hard problems in giving attention to an alleged state policy does not justify a larger deviation. Indeed:

Recognition that a State may properly seek to protect the integrity of political subdivisions or historical boundary lines permits, not more than “minor deviation” from the basic requirement that legislative districts must be as nearly of equal population as is practicable.

Connor, supra, 431 U.S. at 420, 97 S.Ct. at 1836.

The conclusion of the Supreme Court in *Connor* was:

In the absence of a convincing justification for its continued adherence to a plan that even in state policy terms is less efficacious than another plan actually proposed, there can be no alternative but to set aside the District Court's decree for its failure to embody the equitable discretion necessary to effectuate the established standards of the Equal Protection Clause.

431 U.S. at 420-21, 97 S.Ct. at 1837

Since the plan submitted by the Britton, et al. plaintiffs has substantially lower deviations (none over .4%) than any other plan, there is no doubt that such a low deviation is “practicable” and that such plan is easily drawn. Therefore, that plan should be shown a preference over higher deviation plans. The insignificant difference in the number of county splits among the plans does not justify ignoring the significantly lower deviations from equality in the Britton plan.³

As stated in *Chapman v. Meier*, relied upon in *Connor, supra*, in a court designed plan, 420 U.S. 1, 25, 95 S.Ct. 751, 765:

Particular emphasis should be placed on establishing districts with as exact population equality as possible.

³ It is noted that, in fact, the Britton plan splits fewer precincts than does the Hippert plan.

The holding of the United States Supreme Court in *Chapman, supra*, that:

With a court plan, any deviation from approximate population equality must be supported by enumeration of historically significant state policy or unique features. 420 U.S. 1, 26, 95 S.Ct. 751, 765-66

should be followed in this case.

Adherence to that rule means that a smaller deviation will almost always be preferred no matter how small the greater deviation is. Britton, et al. plaintiffs are not arguing for the absolute equality of population required of a congressional plan in considering legislative plans, but do strongly argue that if we can do better, we should.

If any doubt exists that breaking county or municipal lines must be subservient to population equality, the Hippert plan, adopted by the Minnesota legislature but vetoed by the Governor, should put that doubt to rest. That plan splits 40 counties, 39 municipalities and 196 precincts; some of which splits will be shown to be unnecessary. No talisman should control the plan adopted.

II. Specific Objections to the Hippert, et al. Plan

The Hippert, et al. plan clearly was not drawn to minimize population deviation but rather to take advantage of a perceived “safe harbor” deviation of 1%. It brags that “only” three of its house districts exceed that 1% safe harbor. What the Hippert plaintiffs do not disclose is that 94 of their plan’s 134 districts (70%) exceed the .4% maximum deviation uniformly achieved in all districts by the Britton, et al. plan.

The following observations and objections regarding some individual districts found in the plan of legislative redistricting proposed by the Hippert, et al. plaintiffs

attempts to focus on the most blatant violations of the Court's criteria, principles of equality and provisions of law. It is also intended to offer cures to many of the problematic districts. It is not intended to question every discretionary decision or line drawing. The Court has ample equitable authority to do that. This Memorandum calls attention only to the most flagrant issues.

District 2

The goal of the Britton, et al. plan was to keep the Native American population of Lake of Woods, Beltrami (i.e. Red Lake), Itasca and Cass Counties all in one Senate District with the most rural part put into House District 2A and the largest reservation (Leech Lake) into House District 2B. The Hippert, et al. plan chose to divide the largest Native American population into two senate districts and therefore put part into District 2A and part into District 5A. The Court should reject that choice. It is not difficult to maintain the electoral integrity of those Reservations. Therefore, they should be honored.

District 3

The geographic spread of Hippert Senate District 3 from Isle Inlet in Lake of the Woods County to the Duluth suburbs is not logical, not necessary and neither recognizes or honors any community of interest. District 3A does not at all meet the .4% population deviation that the Britton, et al proposed districts meet. The Hippert, et al. District 3 design also suggests intentional dismemberment of the Iron Range community.

District 4

Hippert proposed Senate District 4 is not a true Iron Range District. It splits the Range needlessly between Districts 4B and 3B. No reason is given for this split. Compare that division with the Britton, et al. Senate District 4 which recognizes southwestern St. Louis County as the separate community that it really is.

It is also not rational to put the northeasterly precincts of Duluth City in the Minnesota Arrowhead District. Compare proposed Britton, et al. District 6A with Hippert District 8A.

District 5

Hippert proposed Senate District 5 appears to divide the Native American Reservations Red Lake and Leech Lake into two different Districts 5 and 2. Britton, et al. strongly opposes this division and have offered a plan to include both Reservations in its Senate District 2.

District 6

It is suggested that this Senate District is needlessly long and spread out stretching from Itasca County and the Iron Range (i.e. Coleraine) south to Princeton and the outskirts of St. Cloud (southwestern Benton County) combining mining, recreation (Aitkin) and central Minnesota towns (e.g. Foley) in a single senate district. There can be no legitimate reason for such lack of commonality. Compare Britton et al. proposed

Senate District 3, which is large enough to create the required population but not extending south of Aitkin County.

District 8

District 8 should be rejected, not for what it includes, but rather for what it does with that part of Duluth City that is not in District 8. Specifically, the Hippert, et al. plan takes the northwestern precincts of the City of Duluth and attaches them not to the suburban towns or subdivisions outside the City but rather to Cook and Lake Counties and rural St. Louis County. The effect of that “decision” is to dilute the voice of the city’s residents and not to provide any greater voice to Cook or Lake, which remain a minority of this chopped up district.

District 9

The difference between Hippert, et al. proposed District 9A and Britton, et al. proposed District 8A is that the former includes all of both Oakport and Moorhead Township. The Britton, et al. plan deletes the southernmost part of Moorhead Township along the city’s southern boundary and the northeasterly part of Oakport Township along U.S. Highway 75. The result of the Hippert plaintiffs’ blind adherence to township lines is that the Hippert, et al. proposed House District is 449 people too large, a deviation of 1.13%, while the Britton, et al. proposed district population is 156 people too large, a deviation of .39%.

The issue is whether the inclusion of all of both of those townships, in their entirety, within the City of Moorhead House District justifies a district that exceeds population equality by 1.13% or not. The Britton, et al. plan divides Moorhead City from the balance of the Township at the city's southern boundary. It is submitted that this line is reasonable and makes township boundaries subservient to population equality.

Similarly, the northeastern Oakport Township (east of U.S. Highway 75) is placed with Moland Township, again for closer population equality. There is no greater community of interest between northeastern Oakport and Moorhead than there is between Dilworth and Moorhead. Neither place is part of the core city.

The Britton, et al. plan uses the remainder of Clay County to combine with all of Wilkin County and all of Traverse County and all of Grant County and most of Big Stone County and rural Stearns to form a western Minnesota border county district – a clear community of interest. The Hippert, et al. plan, on the other hand, goes due east and combines with a part of Becker County that has no particular tie to or commonality with either Moorhead or with the balance of Clay County.

District 10

The same east west construct is the Hippert, et al. theory for Senate District 10 – a four county wide band extending from the state's western border to southeast of Long Prairie. Todd County does not share any particular commonality of issues with Wilkin County or Ottertail County. Furthermore, Ottertail does share a commonality of interest

with Douglas County, to wit, economic and structural development along Interstate 94, a fact that Hippert, et al. ignore.

District 11

Likewise, Hippert, et al. Senate District 11 is a five county wide band from the western border of Minnesota to east of Sauk Centre, a senate district that extends almost halfway across the entire state. This is not anyone's "Main Street." Equally questionable is why the Hippert, et al. plan splits the City of Alexandria between districts 11A and 11B. It is not difficult to include all of that city (population 11,070) and its surrounding township (population 4098) in the same house district. See, e.g., Britton House District 9B. What is the justification for that split?

District 12

Hippert, et al. proposed District 12 would be a reasonable possibility except that historically and currently Morrison County has much stronger ties to Benton County than it does to Crow Wing County. Even worse, the Hippert plan needlessly divides the resort communities of southern Crow Wing (e.g. Baxter) off from the rest of the Brainerd Lakes area. Indeed, Baxter is put into an entirely different senate district (District 5). Where is the logic in that? While the concept of "community of interest" may be difficult to articulate or explain in some areas, the Brainerd Lakes area is not at all difficult to describe. Therefore, the Britton et al. plaintiffs request that the resort areas of Crow Wing County be kept in the same senate district. Brainerd and its suburbs should not be

separated from Breezy Point, Crosby-Ironton, Nisswa, Pequot Lakes, etc. At least they should be in the same Senate District. The resort community would not agree with the Hippert, et al. division.

District 13

It is respectfully submitted that there is no good reason to split Todd County off from its southern neighbors. Todd County, alone, is about 60% of a house district. The Hippert, et al. proposal would be rational if it added Todd County in with District 13 instead of making it an “add on” to the Wilkin County/Fergus Falls district (District 10). The Britton, et al. proposal (District 12A) adds just enough from eastern Douglas County and northern Stearns County to create such a district. To that it adds all of Pope County and parts of the counties east and west of Pope to complete a west central senate district (12).

District 14

The weirdest part of the Hippert, et al. division of St. Cloud is that it does not recognize the Mississippi River as a rational boundary but instead divides its own District 14A on both sides of the river without adequate explanation. The second problem with the Hippert, et al. proposed Senate District 14 is that it needlessly divides the populations of both Sauk Rapids City (14A and 15B) and Waite Park City (14B and 15A). The Britton, et al. plan divides neither of these suburbs. (See Districts 13B and 14B)

District 16

Lac Qui Parle, Chippewa and Swift Counties may make sense together, but why add Lyon County and Redwood County south of the natural river boundary? It would it be more logical and recognize a close knit community to add western Kandiyohi in the same Senate District. Districts should have common interests and make sense. This one does neither.

District 17

Senate District 17 is also a far ranging conglomerate extending from outstate Redwood Falls willy nilly into the very 11 County Metropolitan area that the Hippert group argued so vociferously to keep, even including one city (Eden Valley) from Stearns County. Hence, it is a conglomerate of Renville (rural/exurban), Meeker, McLeod and Wright (metropolitan). Where is either the logic or arguable community of interest here?

District 19

This district might make sense if it stopped at New Ulm. Even then, some rationale would have to explain the relationship between New Ulm and the Iowa border. For example, why is District 19A only one county wide? Even adding eastern Redwood County to achieve population equality could be understood. However, adding Nicollet, McLeod and Sibley Counties, a seven (7) county stretch, yells out political gerrymandering of this senate district.

District 20

This district arbitrarily picks and chooses which Mankato suburbs to add to the City. For example, it includes Lime Township and Jamestown Township but excludes the closer Mankato suburb of South Bend Township (population 1,682). District 20A should be urban/suburban Mankato – not rural.

District 21

The primary feature of this proposed district is that it includes the Mankato suburbs of Lake Crystal City, Southbend and Judson with Austin and the smaller towns of rural Mower County and Faribault County along the Iowa border. Again, what is the real, not projected or possible community of interest? Britton, et al. attaches the exurban parts of Mankato to Nicollet County through adjoining North Mankato. Which makes greater common sense and is more equitable?

District 22

The first problem with Hippert, et al. proposed Senate District 22 is that it needlessly divides the City of Faribault with proposed District 52. District 52 is exurban, District 22 is rural. This split is not based upon any of the factors in the Court's November 4 Order. The second problem is that the plan also splits the City of Northfield with District 54B. Why? Finally, what is the rationale for taking only two townships from Rice County into proposed District 22A? Was there no other way to achieve population equality?

Districts 23 and 24

These are the Rochester districts. The proposed Hippert, et al. division raises the question: why divide the city into two separate senate districts: 23B and 24A? With the simple expedient of renumbering 23B to be 24B and proposed 24B to be 23B urban Rochester could be in a single senate district and suburban Rochester could be in another one. See, e.g., Britton et al proposed District 24 (suburban and exurban) and District 25 (entirely within the city and adjoining suburbs). The Hippert, et al. plan puts Rochester City proper in four house districts (23B, 24A, 24B and 25A) while the Britton, et al. plan proposes only three (3) Rochester City House districts for the bulk of its citizens (Districts 24A, 25A and 25B).

District 25

The Hippert, et al. plan proposes a Senate district of part of Rochester, some of Rochester's suburbs, Wabasha County and (believe it or not) the St. Croix River communities between (but not including) Lake City and La Crescent. If this is intended to be a Wisconsin border county district (as well it could be), why include Rochester and its suburbs, which clearly are not part of a St. Croix community? What are the undisclosed reasons for this westward stretch?

District 26

Mower County is a good basis for a House District but its population is not large enough for population equality. The Hippert, et al. plaintiffs choose to sacrifice

population equality for “neatness.” The Britton, et al. plaintiffs propose the addition of Sumner Township to achieve that equality. Legislators do not represent counties, they represent people. Adding Sumner Township (from Fillmore County) does no real damage because the rest of Fillmore is already in the same senate district.

District 27

District 27 is a fine district except why did the drafter divide Big Lake? They did not need to do so. See e.g., Britton et al proposed Senate District 29.

District 28

This district raises the issue of why not a Chicago County house district? After all, that county is metropolitan, but Pine and Kanabec with which it is paired are not.

District 29

A visual inspection of this proposed district shows the words used to show “fairness” do not necessarily translate into actual districts. District 29A splits the City of Ramsey, but includes Linwood. If Linwood were put with its neighbor, Columbus Township, the district would be more compact and Ramsey City could have remained intact.

District 30

The Hippert, et al. proposed plan splits Andover without justification. Andover's population of 30,598 should make it the heart of a district (see Britton, et al. proposed District 44B) with additional population as needed.

District 31

This proposed Senate District splits both Lino Lakes and Hugo into separate senate districts and still does not achieve population equality. The Britton, et al. proposal puts all of Lino Lakes into District 46A and puts all of Hugo into District 43B. The point is not which map splits the fewest municipalities but, rather, what is the justification for each division? Hippert, et al. proposed District 31A has a weird shape (dagger into the heart of Hugo) and a higher deviation than any Britton, et al. proposed district. How can that deviation be justified? How can that shape be justified?

District 32

The Hippert, et al. plan drafters made the decision to split Hanover City between Districts 32B and 33A. The Britton, et al. plan made the opposite decision, not to split Hanover City. The Britton plan is a Wright County House district but also includes 609 people from the Hennepin County part of Hanover. The decision was made to keep the City of Hanover whole, both the Wright County portion and the Hennepin County portion. Which is correct? It is respectfully submitted that either is correct, depending on the existence (or not) of a rational basis.

District 33

On the other hand, the decision to put parts of Maple Grove into three separate senate districts, as the Hippert, et al. plan has done, calls for a very strong rationale. In the Hippert, et al. plan, there are parts of Maple Grove in District 33B, 34B and 35B. While Maple Grove's population exceeds one Senate District, it does not exceed three House Districts. The Britton, et al. plan therefore put 51,428 Maple Grove residents into proposed Senate District 47 and the remainder into District 48A.

District 34

Hippert, et al. proposed Senate District 34 meanders all over Hennepin and Wright Counties including, as noted above, a piece of Maple Grove. It is not at all clear why District 34B, which is a reasonable community (other than its unexplained inclusion of an arbitrary part of Maple Grove), should then be expanded into the rural part of Wright County instead of expanding north into the more suburban and fast growing Rogers and St. Michael. Simply put, the community of interest from Corcoran runs north of Interstate 94, not west. Just drive it, view it and see.

District 35

District 35A should be principally Plymouth, but Hippert, et al. House District 35B seems to be a "leftover" with a few Plymouth precincts and the rest of Maple Grove. The Britton, et al. plaintiffs submit that there is no community of interest at all in District 35B. Its weird jigsaw puzzle shape may be explainable, but not on a community of

interest basis and certainly not on a preservation of municipal boundary lines base. The eastern part of Plymouth is a much closer community with western New Hope in their socioeconomic makeup than it is to Maple Grove. The fact that the highly partisan chair of the Republican House redistricting committee lives in Plymouth just may explain its weird shape. Proposed District 50 submitted by Britton et al. does not include any part of Maple Grove, but only Plymouth, Medicine Lake and western New Hope.

District 36

District 36 includes parts of Golden Valley, parts of New Hope and parts of Plymouth. That very fact shows an agreement by the Hippert, et al. group that western New Hope does have a commonality with Plymouth as noted above (District 35). It is the addition of parts of Golden Valley that destroys that commonality and splits Golden Valley needlessly. Compare this to Britton, et al. proposed Senate District 55 which is built around Golden Valley and keeps it whole with all of Hopkins and most all of St. Louis Park. Senate District 55 under the Britton, et al. plan is a true community of interest, economically and socially. The fact that it preserves most of those three cities in the same district is just a bonus.

District 38

Proposed Hippert, et al. Senate District 38 is a long shaped district, splitting Coon Rapids. The 38B portion may be fine, but adding an arbitrary part of Coon Rapids makes

the Senate District both not compact and not a single community of interest. What is the actual rationale, not just hypothetical?

District 40

District 40 may be okay, even though it straddles the Ramsey/Anoka County line. Its problem is that there is no relationship whatsoever between the 40B part (North Oaks, White Bear Township and Gem Lake) and the 40A part (Lino Lakes). They do not represent or meld similar interests at all.

District 41

The most serious problem in this proposal is the combining Maplewood and Roseville. It is not that municipal splitting has occurred, the problem is the inappropriate pairing.

District 43

This district is contrary to the criteria that the Hippert, et al. group proposed to the Court. Specifically, it needlessly divides the City of Stillwater into two house districts. The city's population (18,225) fits neatly into a single district and still has room for Bayport, Lake Elmo, Stillwater Township and Oak Park Heights. The shortfall can be made up from Grant (still included in Senate District 43). The Britton, et al. plaintiffs submit to the Court that their proposed Senate District 43 is a closer community of interest. Besides, it does not split Hugo as the Hippert, et al. proposal does.

Proposed Hippert, et al. District 43A also splits off from Hugo that part west of Highway 61 into a different senate district. It doesn't have to be, divided. The Britton, et al. proposed Senate District 43 shows how a St. Croix border district can be created. Equally important, what is any actual community of interest between Hugo and Woodbury?

District 44

What is the conceivable rationale for the Hippert plan to go west of Watertown in drafting this district? Its proposed District 44B is a pretty good combination of Chaska and its immediate neighbors. What makes this district socially and economically unsatisfactory is that it needlessly combines that good start with McLeod County. Arguably (but not a very good argument) one could add the Waconia and Norwood-Young America cities to proposed District 44B, but going further west elevates form (i.e. straight lines) over substance (i.e. social and economic communities of interest). It should be rejected. Compare Britton, et al. proposed Senate Districts 34 and 18.

Just as inappropriate and needless, the Hippert, et al. plan divides Chanhassen into two distinct senate districts (Districts 44B and 45A). The Britton, et al. plan puts all of Chaska and all of Chanhassen into a single senate district, primarily because they form a coherent, easily understood community of interest.

District 45

For some unexplained reason, the Hippert, et al. plaintiffs, for whom county and municipal boundaries were said to be inviolable, in this district not only divide Chanhassen into two separate senate districts, but also crosses the Hennepin County boundary. Victoria and Chanhassen (44B) have nearly equal populations (7,350 vs. 7,800). This split is pointless. Plus proposed House District 45A is short by 360 people anyway. Why not simply switch them and still have equal population (even using the lax Hippert, et al. population standard).

District 46

This district, and the split between proposed District 46A and proposed District 46B, is one of the most arbitrary and irrational twisting and turning of boundary lines. Splitting of Minnetonka City within the Senate District makes no sense at all. The portion of Minnetonka that the plan puts into this proposed Senate District should not be further subdivided. There are about 39,450 residents of Minnetonka City in proposed District 46. Simply put all of them in the eastern half of the district with a very few additions to achieve .4% equality and put all of the rest of the smaller communities around the Lake in their own separate district (e.g. 46B), so that Minnetonka city does not dominate both House districts and is not further split. The remaining towns throughout Lake Minnetonka should have their own voice.

District 47

The Hippert, et al. plan chooses to divide Golden Valley between Districts 47 and 36, an unnecessary split. By comparison, the Britton, et al. proposal (District 55) keeps all of Golden Valley, all of Hopkins and most of St. Louis Park, in a single senate district. It is undeniable that Golden Valley, Hopkins and St. Louis Park are a close knit community in every way. There is no reason to divide them into separate Senate districts.

District 50

The primary problem with this Hippert, et al. proposed Senate District is that it does not include enough population from Inver Grove Heights (with which it has a much closer commonality), and too much of Eagan. Interstate 35E should be the boundary. It would be a division that the residents of all of these communities could understand. This Hippert, et al. proposal simply has no rational basis. Again, just drive it and have a view.

District 51

Hippert, et al. proposed Senate District 51 splits both Cottage Grove and Woodbury needlessly, even still with a deviation of .74%. Compare the Britton, et al. plan that puts nearly all of Woodbury in a single senate district (District 43) and separates it from the St. Croix River boundary communities. The Britton, et al. plan does not attempt to create a community of interest. It simply recognizes its current existence. The Britton, et al. plan achieves nearly complete boundary preservation.

District 52

In creating its proposed Senate District 52 the Hippert, et al. plaintiffs again manage to violate their own rule of separating the 11 county metropolitan area from the rest of the state. The only thing that Scott and Le Sueur counties have in common is a small part of New Prague. Combining Belle Plain with Le Sueur County, by itself, ignores that county line and the rural/metropolitan distinction. To then add a portion of the City of Faribault from Rice County with the City of Jordan renders that 11 county metropolitan designation totally meaningless. In addition, what is the rationale for splitting off half of such a significant city as Faribault? Even if there were a rationale, this split results in both halves burdened by an excessive .9% deviation. Further, what is the commonality in this proposed Senate District?

District 53

Why was the decision made to divide the Mdewakanton Sioux Reservation between 53A and 53B? Was it just to follow township boundaries? Does this blind adherence to township boundaries, when it is convenient, justify ignoring a significant community of interest and a Native American Reservation and a resulting 1.29% population deviation? The Hippert, et al. plaintiffs argue for objective measures. Wouldn't population equality be an objective measure, perhaps even explaining municipal or precinct splits? A plan such as the Britton, et al. plan, which focuses on avoiding Reservation splits at the cost of a township split, would seem to be rationally based. See Britton, et al. proposed District 35. Blind adherence to municipal boundaries

means community of interest gets ignored, a Native American Reservation gets split and a population deviation of 1.29% results.

District 54

Why is Lakeville divided into two Senate Districts (54 and 57) when it is not large enough for even one (1). The result of this unexplained split is that the Hippert, et al. Senate District 54 stretches from suburban Lakeville all the way down to Northfield and splits Northfield City to boot. The Britton, et al. plan prefers not to divide Northfield City (District 28) but instead put the entire city with its easterly neighbors, Empire and Farmington.

District 56

This proposed district is widely spread and cuts a swath through central Dakota County including parts of Burnsville, Eagan and Inver Grove Heights (which should go north with Mendota Heights in District 50 and possibly avoid one split). Arguably, Burnsville and Eagan have a common culture and common interest. It is respectfully submitted that Inver Grove Heights is not part of that group.

District 57

The primary issue presented by this Hippert, et al. proposal is why are two Lakeville precincts put into District 57 when the rest is in District 54? All of that city

could easily have all been put in one Senate District. See e.g. Britton, et al. proposed Senate District 36 which also includes all of closely related Farmington.

District 58

This might not have been a badly designed district except that it is used to complete the dismemberment of Cottage Grove into two totally unrelated Senate Districts 51 and 58. There is no good reason why Cottage Grove, a city of 34,589 people, cannot be in a single senate district. See e.g. Britton, et al. proposed District 38 which combines Cottage Grove, Hastings (both the Dakota County and the Washington County parts) with the third ring suburbs of Newport, Grey Cloud Island and St. Paul Park. What makes the Hippert, et al. plan even worse is that Cottage Grove is put in the same senate district with Red Wing, Zumbrota and most of Goodhue County. Wasn't it the Hippert, et al. plaintiffs who that persuaded the Court to establish an 11 county metropolitan area, which this district, too, breaches without justification? Population equality is certainly not a factor as the proposed House deviations are .95% and .68%.

Districts 59-63

The Britton, et al. plaintiffs' objection to these districts is the Hippert group's clear attempt to pack as many people as they could into Minneapolis City Districts. An examination of the plan's deviation reports shows a mean deviation for those 10 House districts of .67% as compared to a statewide mean deviation of .59% (compare the Britton, et al. plan's deviation mean of .23%).

District 64

The Hippert, et al. proposed Senate District 64 combines parts of St. Anthony Park, Falcon Heights and Lauderdale (similar communities) with Summit University, Frogtown and part of St. Paul's Como Park (part). Where is that community? It combines central city, lower income residents with much more affluent suburbanites. This combination negates a traditional minority majority district. It appears to be racially regressive, and it makes no common sense.

District 67

This is one of the worst district designs in the entire Hippert, et al. plan. It combines downtown St. Paul, Dayton's Bluff, the Hispanic West Side and Sunray-Battle Creek neighborhoods with Maplewood (part), St. Paul Park, Newport and yes, even Grey Cloud Island. It is almost as if the drafter ran out of districts and dumped everything left over into District 67. Not even the most imaginative drafters could find a community of interest here. Not even close. This proposal should be rejected as being an insult to all of the criteria adopted.

III. Martin Plan

The Martin, et al. plan does a little better than the Hippert, et al. plan in achieving the population equality that is required, and not using a 1% "safe harbor." It creates no districts with greater than a 1% deviation and only 81 districts with a deviation greater than .4% (i.e. 60%). There are only a few proposed senate districts that are highly

questionable. The Martin, et al. plaintiffs do a far better job of adhering to the Court's redistricting criteria but it, too, has some clear defects.

District 2

There is no need to have included Norman County or even Mahnomen County in this District, when the mere addition of more of Beltrami would have sufficed. If that were done, the Red Lake Reservation and the Leech Lake Reservation could be in the same Senate District – a district that does not need to touch North Dakota.

District 4

This is perhaps the most crazy district in the Martin, et al. plan with Cook, Lake and Koochiching Counties merged in with the suburbs of Duluth. The goal appears to be “a ring around the Range” but it still leaves open the issue of where is the community of interest. Why are the Duluth suburbs more properly with Koochiching than with Duluth?

District 12

District 12 makes some sense except that it is not at all clear why the drafter includes part of Morrison County with the district. The west side of Mille Lacs Lake and the eastern boundary of Morrison County is a natural point of division of House District 12B.

Districts 36, 37 and 46

Martin, et al. proposed Districts 36, 37 and 46 needlessly divide Plymouth into three (3) Senate Districts. The Britton, et al. plan divides it only between Senate Districts 50 and 51. Northern Plymouth does not have a community of interest with Maple Grove at all.

Packing

The other major disagreement between the Britton, et al. plan and the Martin, et al. plan is the decision of the latter to pack the cities of Rochester, Mankato and St. Cloud within their borders. While those cities' boundaries may be honored, there is no need to pack them as tightly as that plan does. Furthermore, there is no justification to cut off the City of Mankato from its suburbs (e.g. South Bend and Skyline).

Conclusion

In the course of drafting a legislative redistricting plan, every line that is drawn has a consequence, socially, politically and even economically. The role of this Court in choosing where to draw the lines should be neutral politically but should have a clear motive of recognizing that people choose to live in areas with others who share their common concerns. That may or equally may not coincide with political boundaries. People may be "Rangers," suburbanites, urbanites, farmers or small town residents despite municipal boundaries.

The totally understandable partisan goal of the other parties need not be deprecated, but that goal is not a factor for a Court to consider. Only a political body may, and in this case, could have considered, but did not do so successfully. No political compromise was reached between the legislature and the governor, thus creating the necessity for the commencement of a law suit seeking a judicial remedy, both in a state court and in the United States District Court.

The Britton, et al. plaintiffs are DFL oriented. No secret is made of that, but they fully believe that the plan that they have submitted is in the best interest of all Minnesotans. The Britton, et al. plan was drafted incumbent blind. Neither of the others likely was. Incumbent protection is not an evil to be avoided. It just should not be a factor in a judicial setting.

The Britton, et al. plaintiffs ask this Court and its members to use their knowledge of this state, its people, its economics, its geography, the factors that unite us and those that divide us to draft a plan that most of us can say, “Yes, that makes sense – common sense.” A Court is a judicial body, not a political one. The Britton, et al. plaintiffs ask this Court to adopt the plan that they have submitted and not either of the other ones because they truly believe it to be in the best interest of the citizenry. To the degree that this Court disagrees with any particular Britton proposed district construction, use your equitable powers to modify it. For the Court’s convenience, maps of each proposed district are contained in the attached Appendix.

Your task is not easy, but it is critical. As Mr. Justice Page wrote so eloquently, in dissent, in a recently released Supreme Court decision:

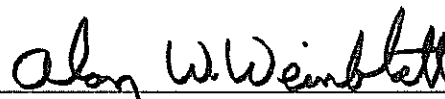
Impasses between the two political branches of government are part and parcel of the political process. Impasses between the two political branches of government that result in a request for the judicial branch to intervene, and to decide the very issues on which the other branches of government are at impasse, make the judicial branch part of that political process. Here, at some level, it seems that each of the two political branches, along with their surrogates, is using the judicial branch as a tool to reach their respective political ends. And once the judicial branch is perceived to be part of the political process, we have put at risk the independence of the judiciary that is fundamental to our tripartite system of government. (Internal citations omitted)

State Senator Warren Limmer, et al. v. Lori Swanson, et al., No. A11-1222, Nov. 30, 2011.

Minimize that risk by using your own good judgment.

Respectfully Submitted,

Dated: December 9, 2011



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STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A11-152

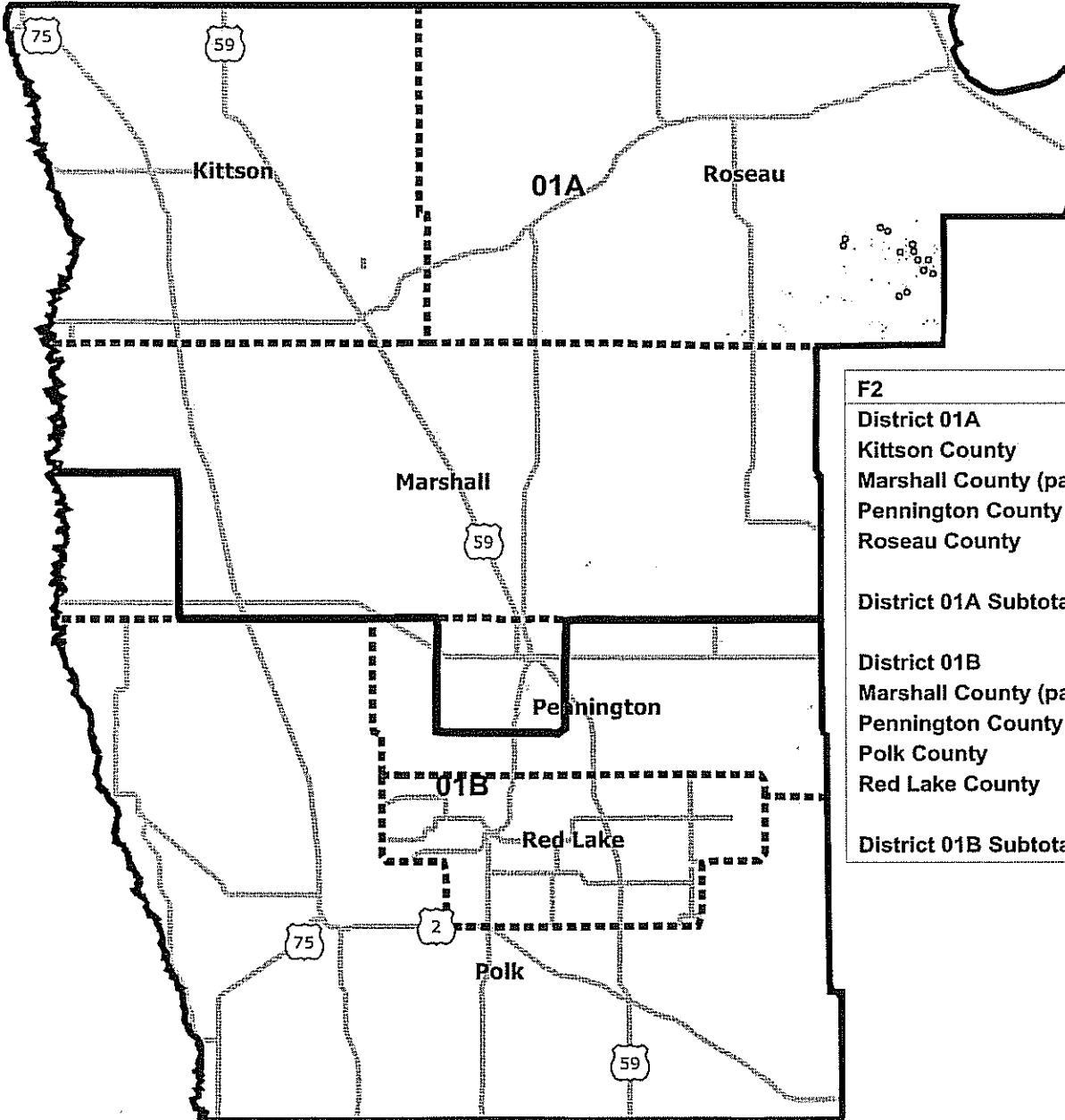
APPENDIX

TO

BRITTON, ET AL. PLAINTIFF-INTERVENORS'
RESPONSE TO PROPOSED LEGISLATIVE PLANS

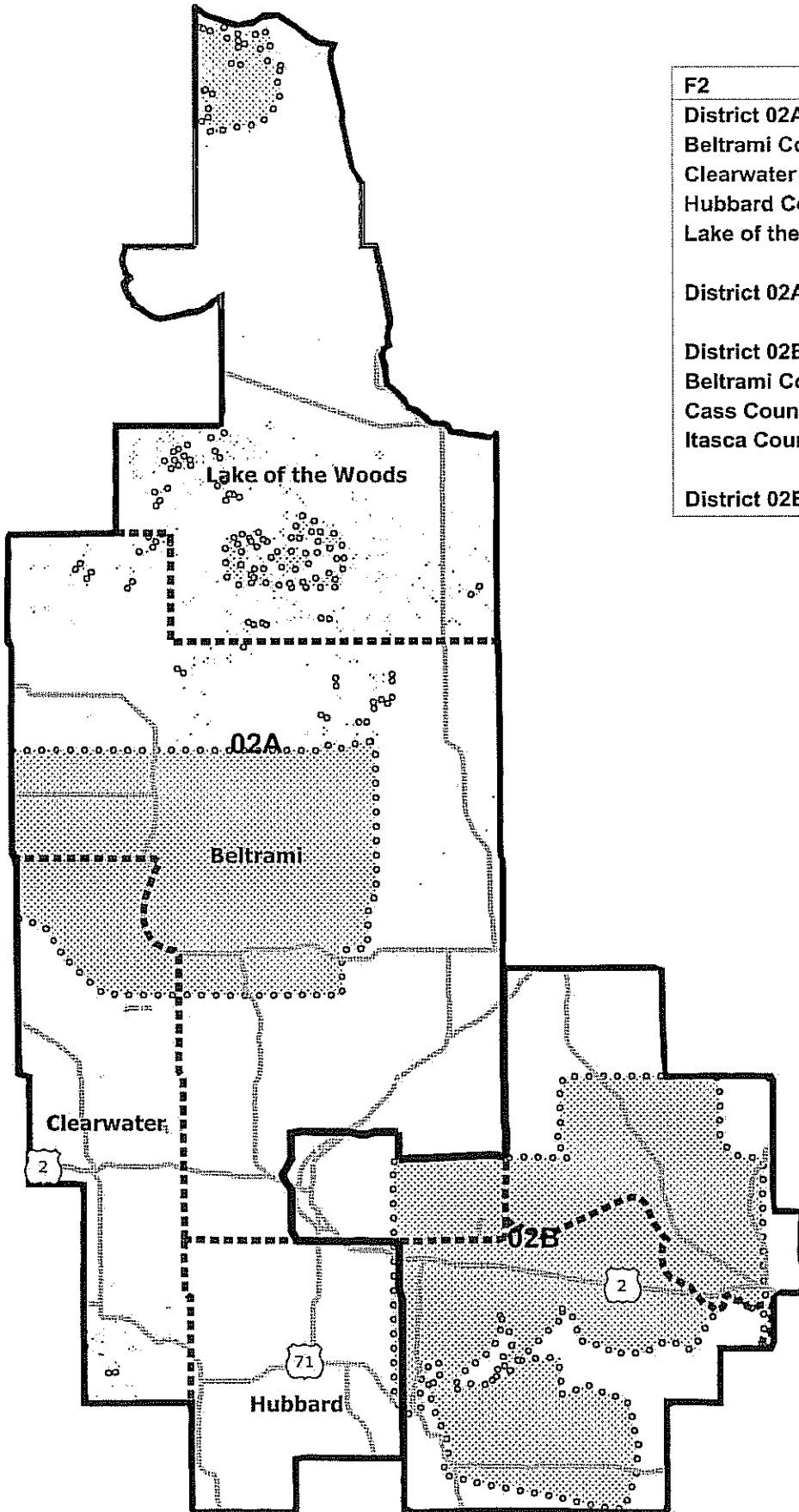
MAPS OF BRITTON, ET AL. PROPOSED
LEGISLATIVE DISTRICTS 1-67

Britton et al State Legislative Plan District 01A and 01B



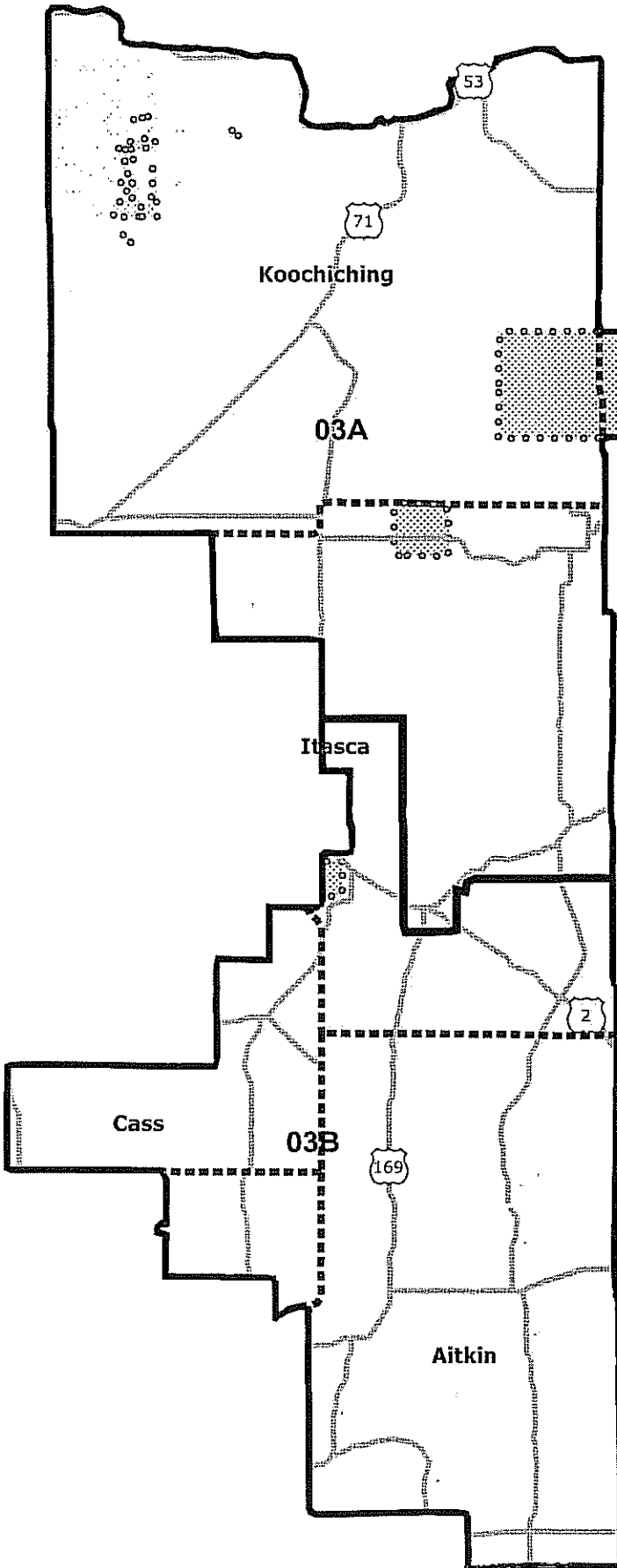
F2	F11
District 01A	
Kittson County	4,552
Marshall County (part)	8,348
Pennington County (part)	11,169
Roseau County	15,629
District 01A Subtotal	39,698
District 01B	
Marshall County (part)	1,091
Pennington County (part)	2,761
Polk County	31,600
Red Lake County	4,089
District 01B Subtotal	39,541

Britton et al State Legislative Plan District 02A and 02B



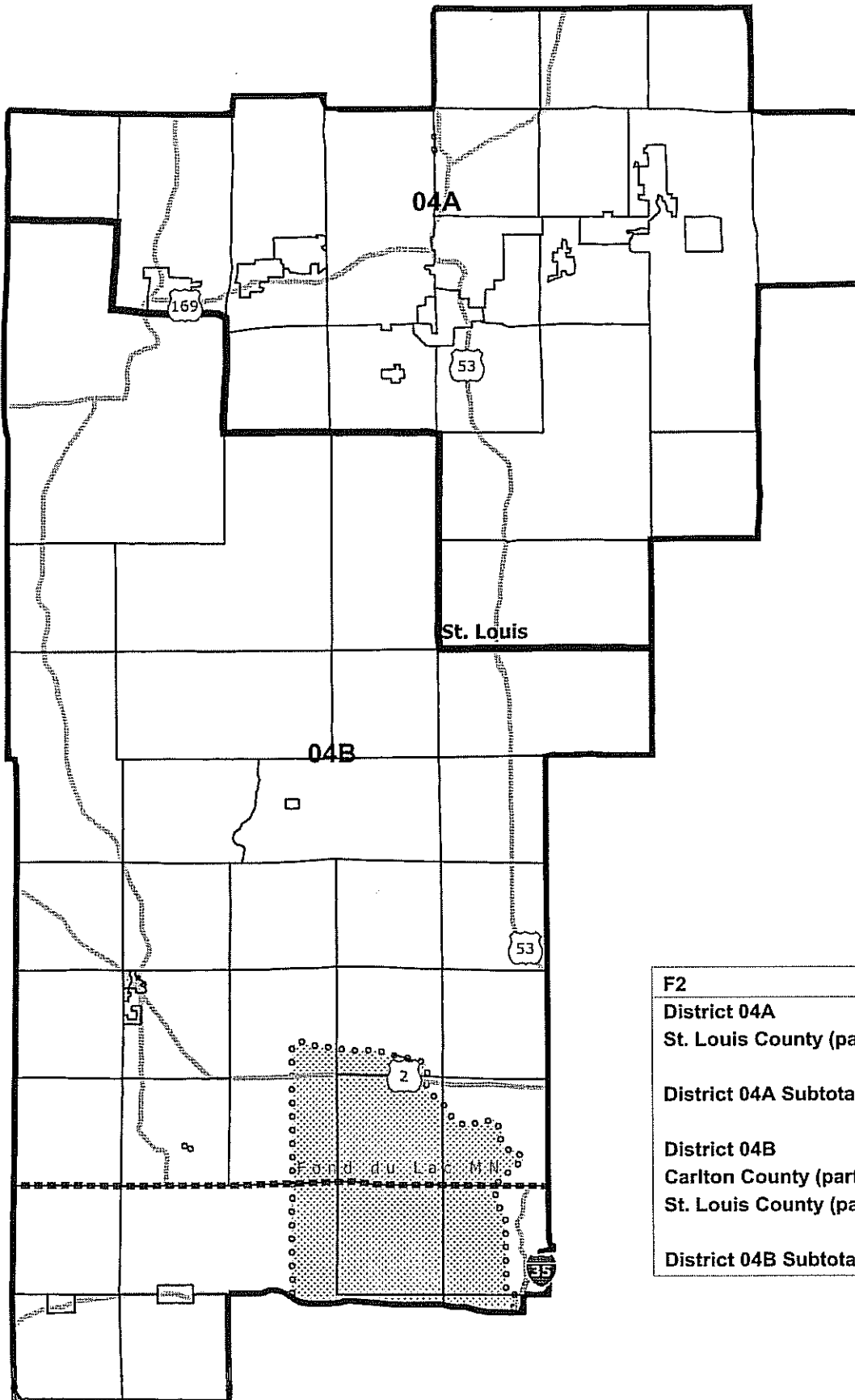
F2	F11
District 02A	
Beltrami County (part)	19,030
Clearwater County (part)	8,055
Hubbard County (part)	8,338
Lake of the Woods County	4,045
District 02A Subtotal	39,468
District 02B	
Beltrami County (part)	25,412
Cass County (part)	8,936
Itasca County (part)	5,376
District 02B Subtotal	39,724

Britton et al State Legislative Plan District 03A and 03B



F2	F11
District 03A	
Itasca County (part)	26,007
Koochiching County	13,311
St. Louis County (part)	319
District 03A Subtotal	39,637
District 03B	
Aitkin County	16,202
Cass County (part)	5,525
Crow Wing County (part)	4,111
Itasca County (part)	13,675
District 03B Subtotal	39,513

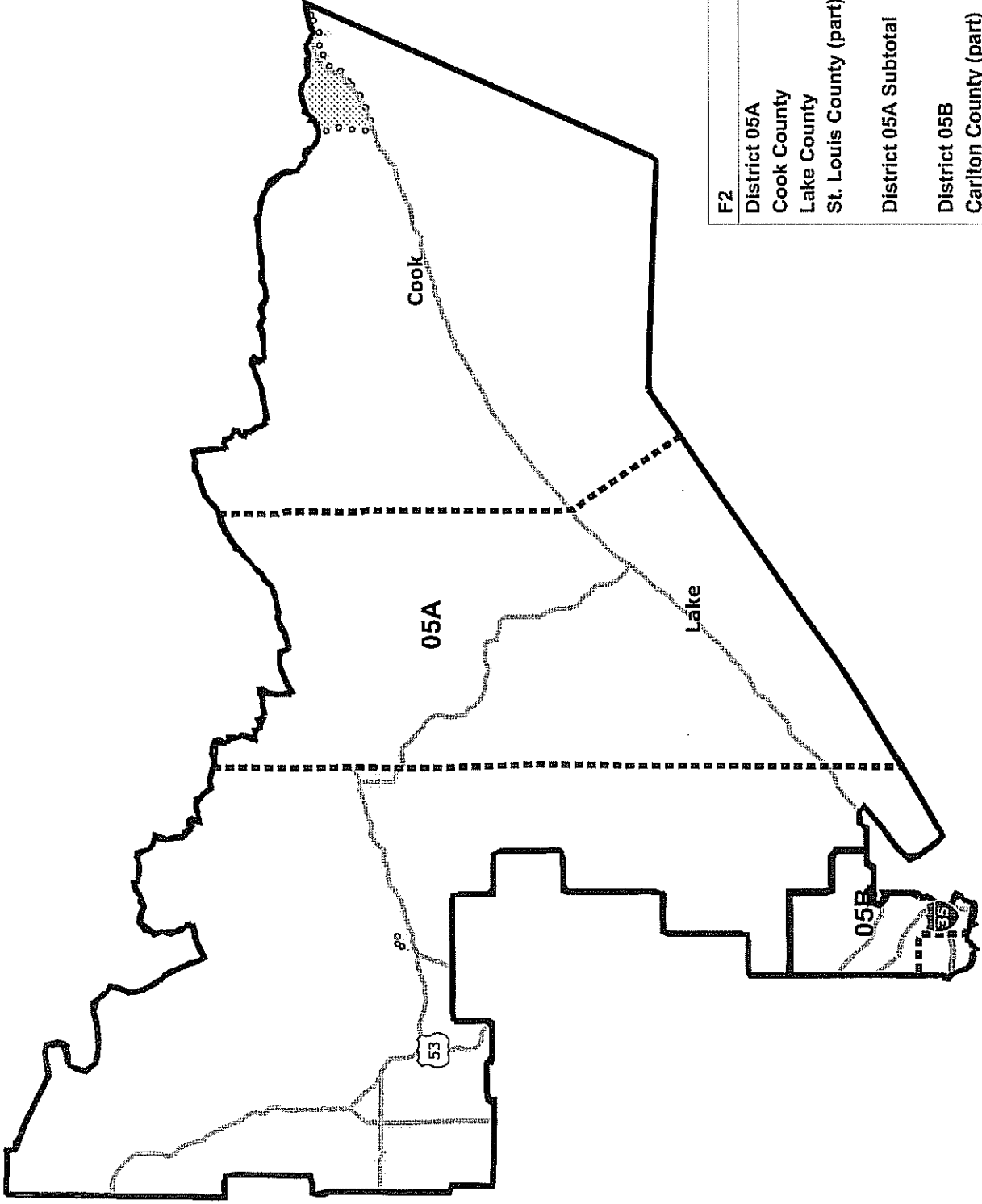
Britton et al State Legislative Plan District 04A and 04B



F2	F11
District 04A	
St. Louis County (part)	39,526
District 04A Subtotal	39,526
District 04B	
Carlton County (part)	15,203
St. Louis County (part)	24,390
District 04B Subtotal	39,593

Britton et al State Legislative Plan

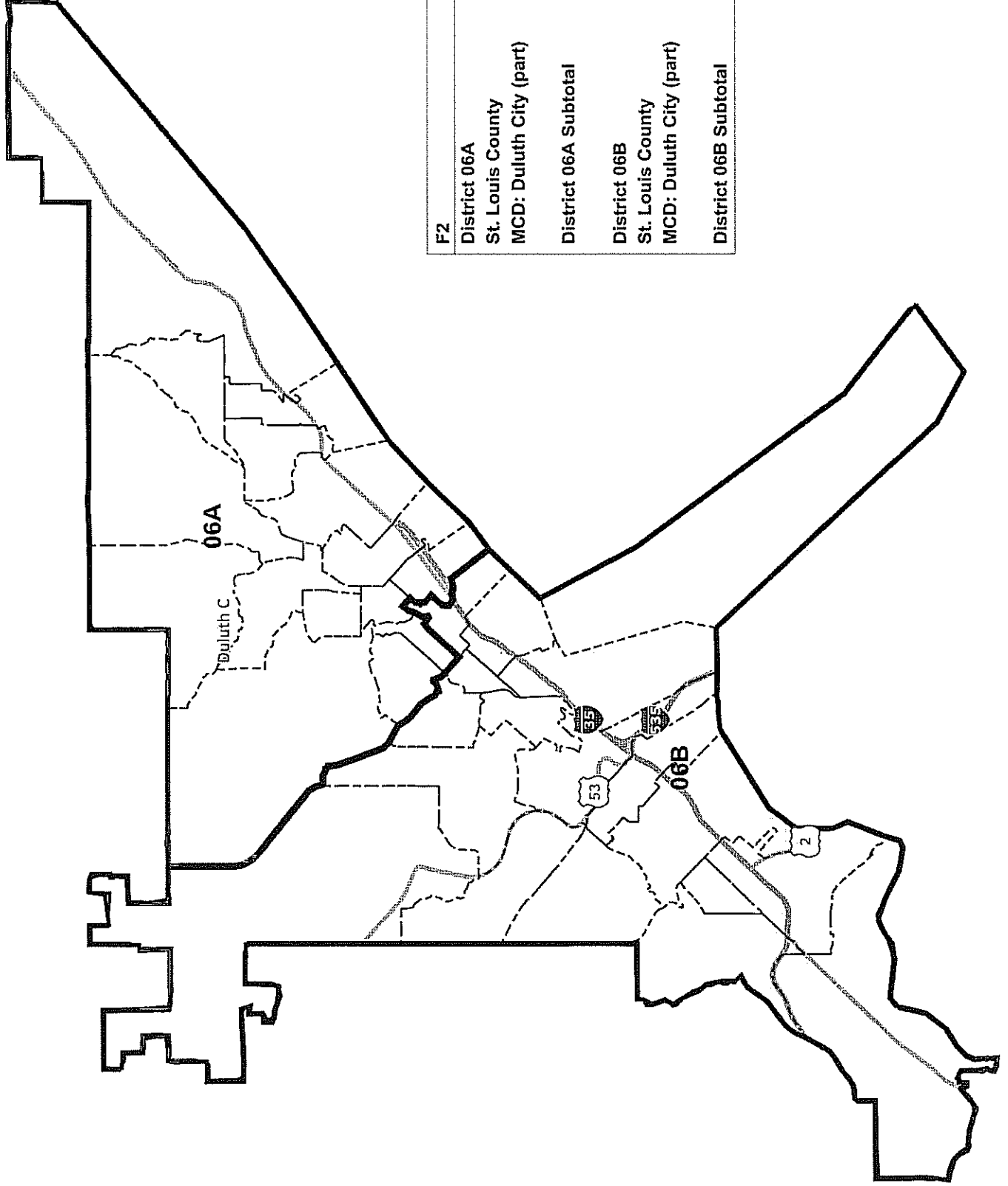
District 05A and 05B



F2	F11
District 05A	
Cook County	5,176
Lake County	10,866
St. Louis County (part)	23,543
District 05A Subtotal	39,585
District 05B	
Carlton County (part)	6,153
St. Louis County (part)	33,290
District 05B Subtotal	39,443

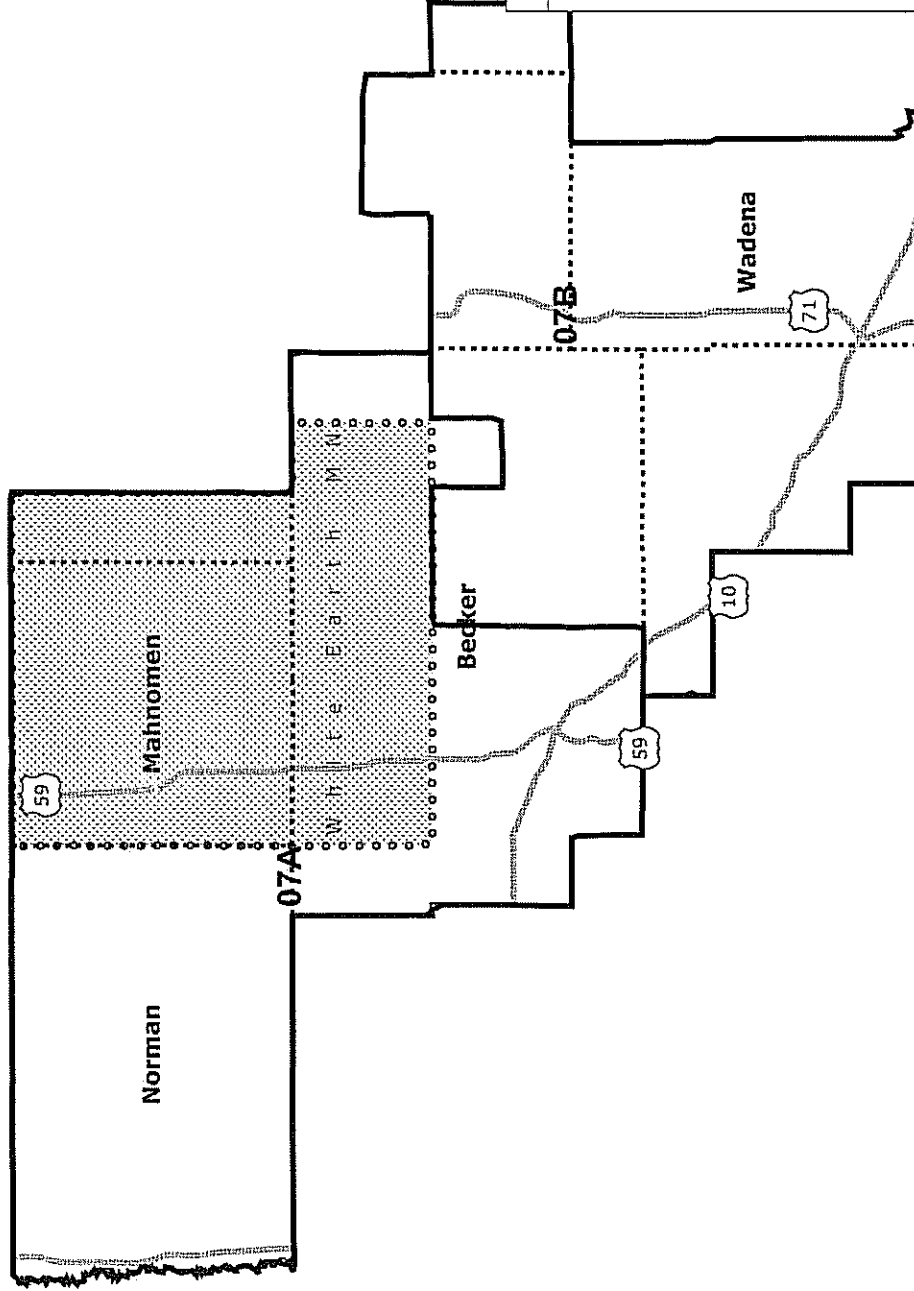
Britton et al State Legislative Plan

District 06A and 06B



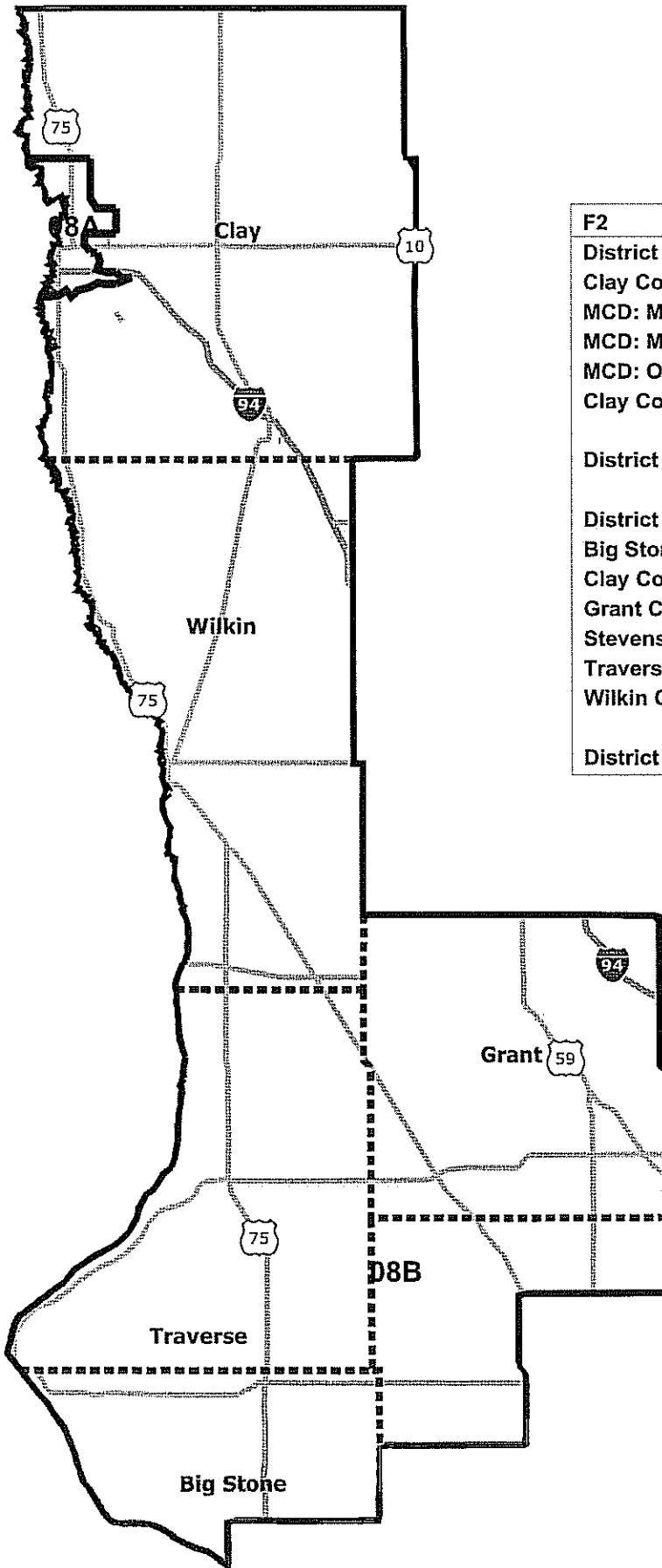
F2	F11
District 06A	
St. Louis County	39,713
MCD: Duluth City (part)	39,713
District 06A Subtotal	
District 06B	
St. Louis County	39,445
MCD: Duluth City (part)	39,445
District 06B Subtotal	39,445

Britton et al State Legislative Plan District 07A and 07B



County	Population
District 07A	
Becker County (Part)	26,625
Clearwater County (Part)	640
Mahnomen County	5,413
Norman County	6,852
District 07A Subtotal	39,530
District 07B	
Becker County (Part)	4,840
Cass County (Part)	434
Hubbard County (Part)	12,090
Otter Tail County (Part)	8,405
Wadena County	13,843
District 07B Subtotal	39,612

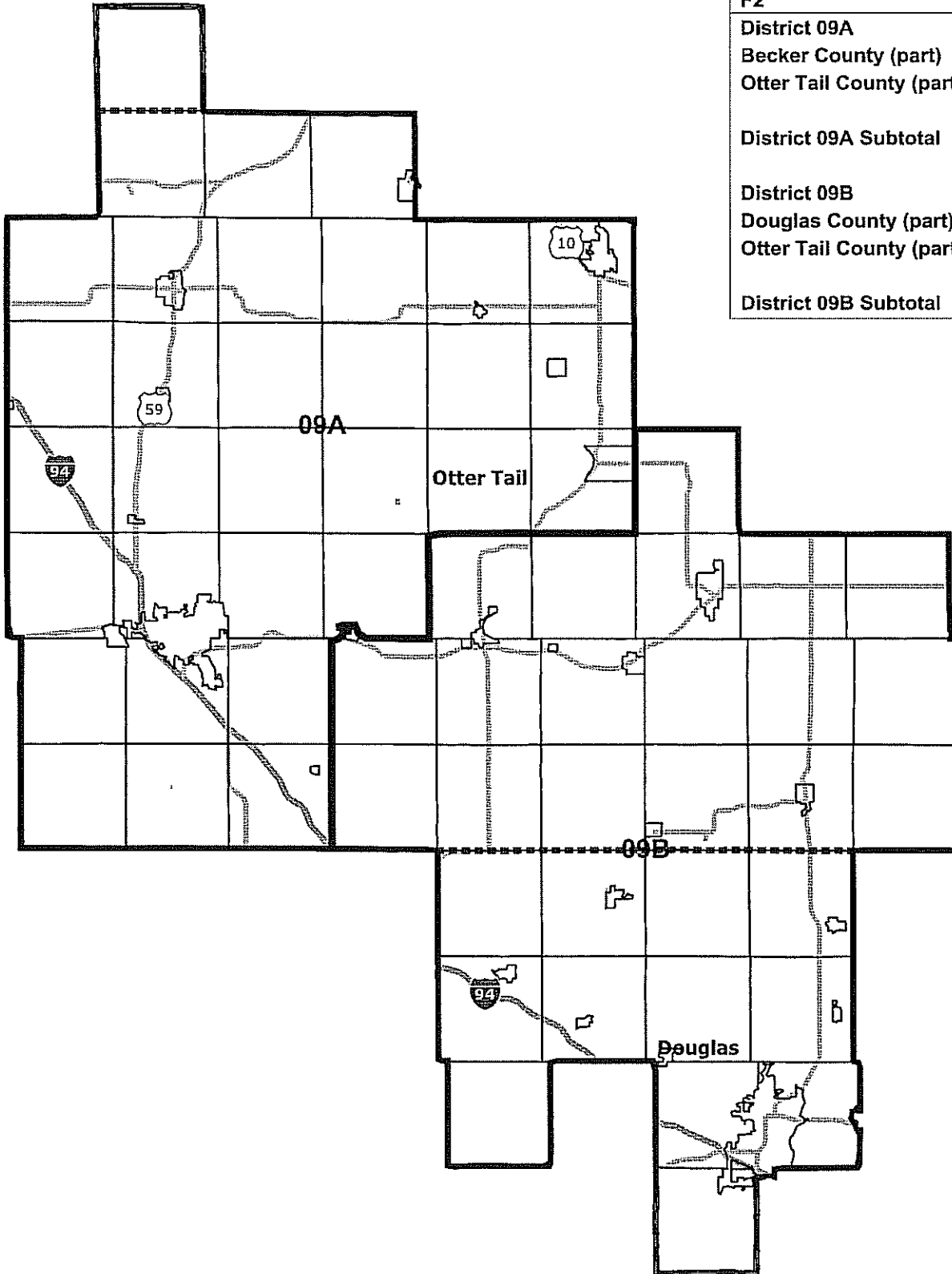
Britton et al State Legislative Plan District 08A and 08B



F2	F11
District 08A	
Clay County	
MCD: Moorhead City	38,065
MCD: Moorhead Twn (part)	30
MCD: Oakport Twn (part)	1,643
Clay County Subtotal	39,738
District 08A Subtotal	39,738
District 08B	
Big Stone County (part)	2,348
Clay County (part)	19,261
Grant County	6,018
Stevens County (part)	1,793
Traverse County	3,558
Wilkin County	6,576
District 08B Subtotal	39,554

Britton et al State Legislative Plan

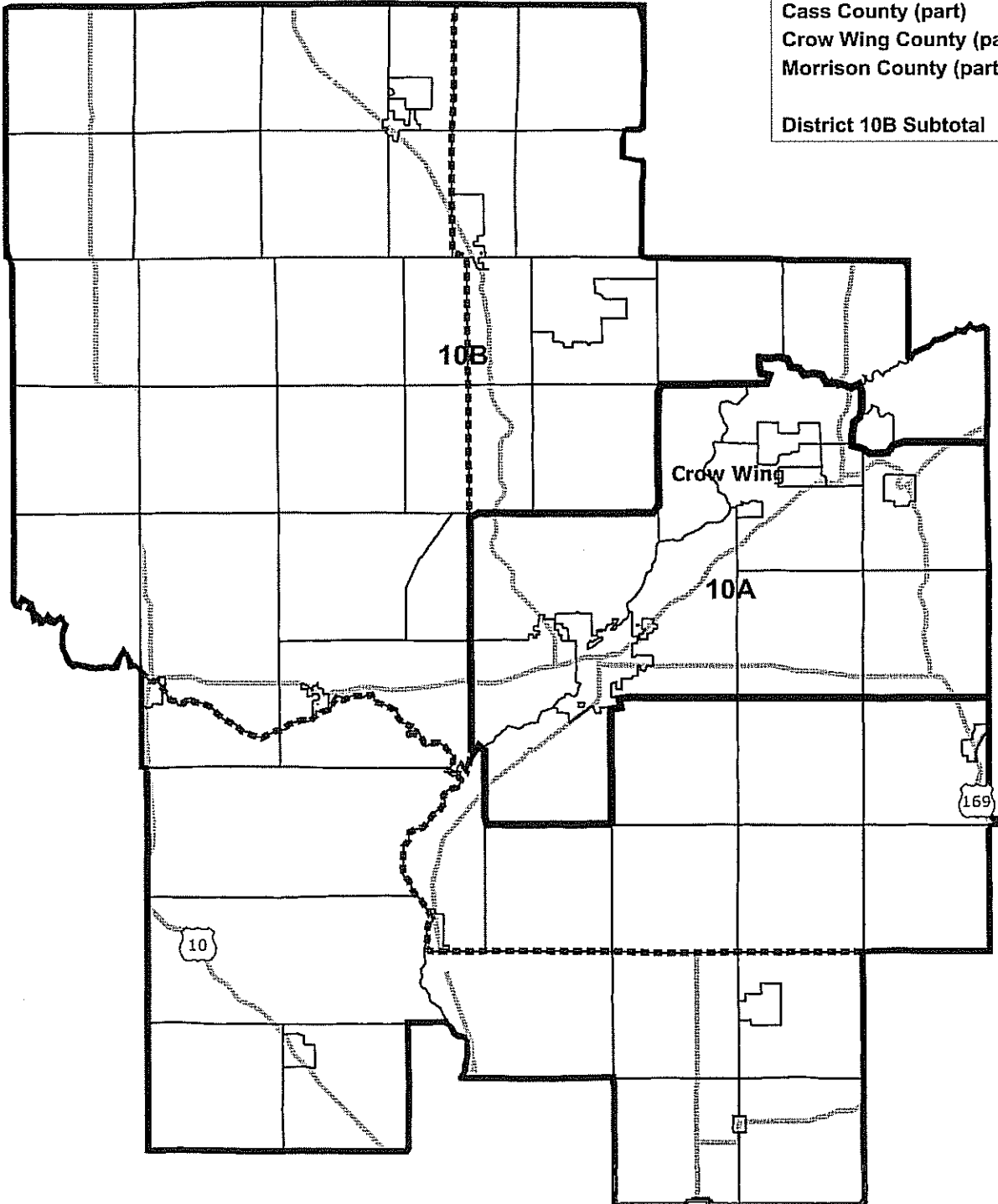
District 09A and 09B



F2	F11
District 09A	
Becker County (part)	1,039
Otter Tail County (part)	38,521
District 09A Subtotal	39,560
District 09B	
Douglas County (part)	29,363
Otter Tail County (part)	10,377
District 09B Subtotal	39,740

Britton et al State Legislative Plan District 10A and 10B

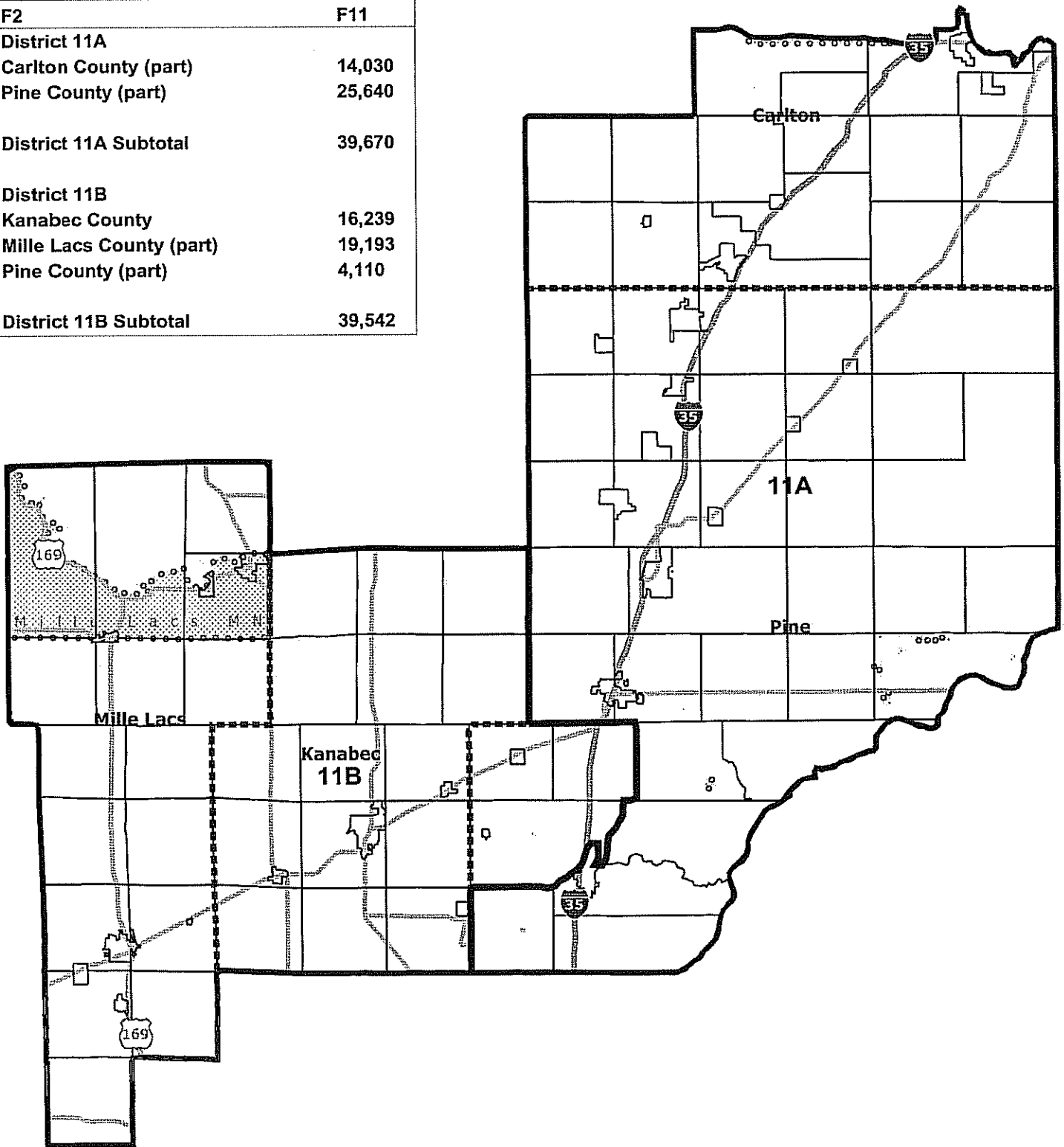
F2	F11
District 10A	
Crow Wing County (part)	39,575
District 10A Subtotal	39,575
District 10B	
Cass County (part)	13,672
Crow Wing County (part)	18,814
Morrison County (part)	7,188
District 10B Subtotal	39,674



Britton et al State Legislative Plan

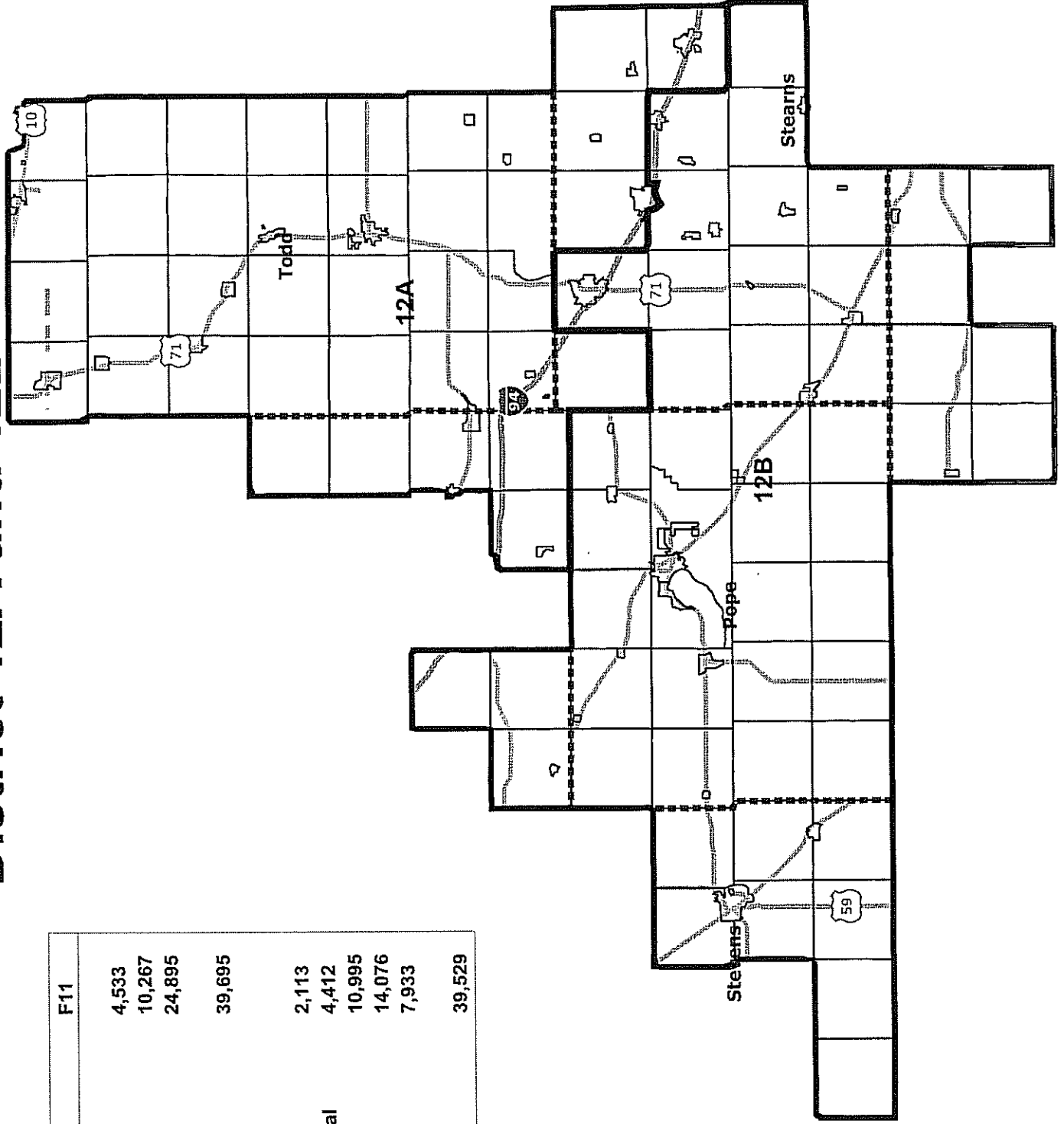
District 11A and 11B

F2	F11
District 11A	
Carlton County (part)	14,030
Pine County (part)	25,640
District 11A Subtotal	39,670
District 11B	
Kanabec County	16,239
Mille Lacs County (part)	19,193
Pine County (part)	4,110
District 11B Subtotal	39,542



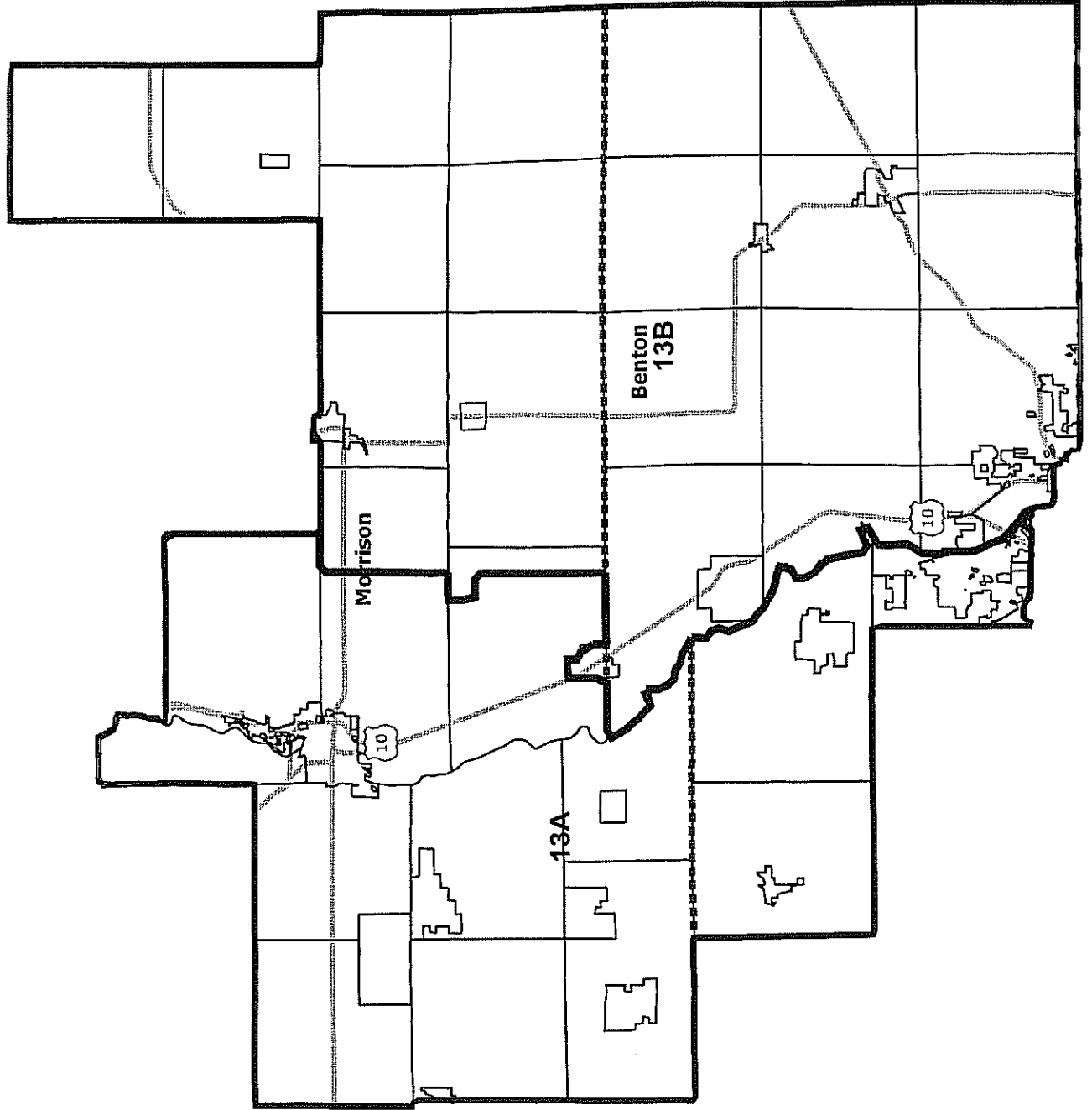
Britton et al State Legislative Plan District 12A and 12B

F2	F11
District 12A	4,533
Douglas County Subtotal	10,267
Stearns County Subtotal	24,895
Todd County	39,695
District 12A Subtotal	
District 12B	2,113
Douglas County Subtotal	4,412
Kandiyohi County Subtotal	10,995
Pope County	14,076
Stearns County Subtotal	7,933
Stevens County Subtotal	39,529
District 12B Subtotal	



Britton et al State Legislative Plan

District 13A and 13B

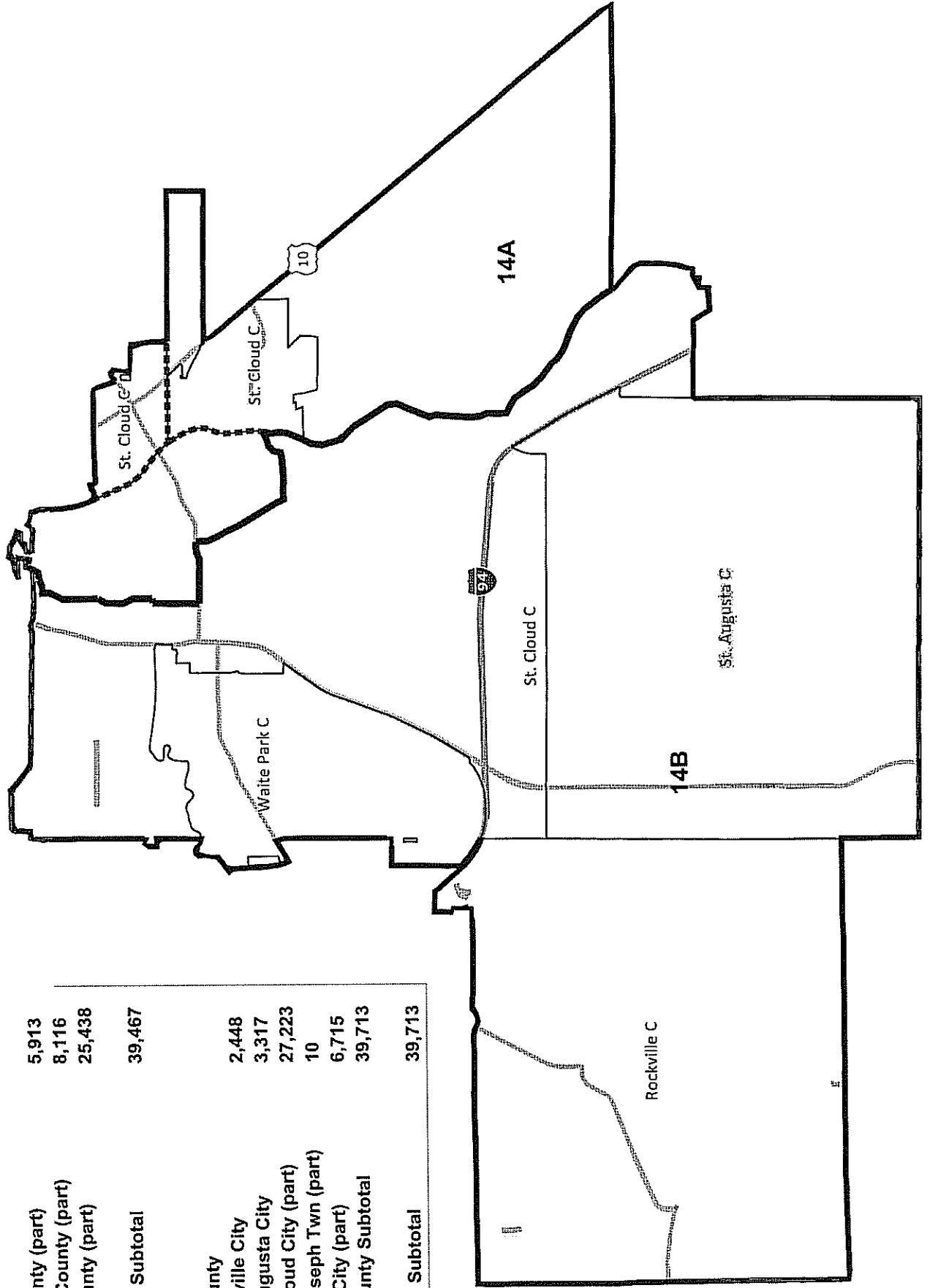


F2	F11
District 13A	18,876
Morrison County (part)	20,796
Stearns County (part)	39,672
District 13A Subtotal	32,538
District 13B	7,134
Benton County (part)	39,672
Morrison County (part)	
District 13B Subtotal	

Britton et al State Legislative Plan

District 14A and 14B

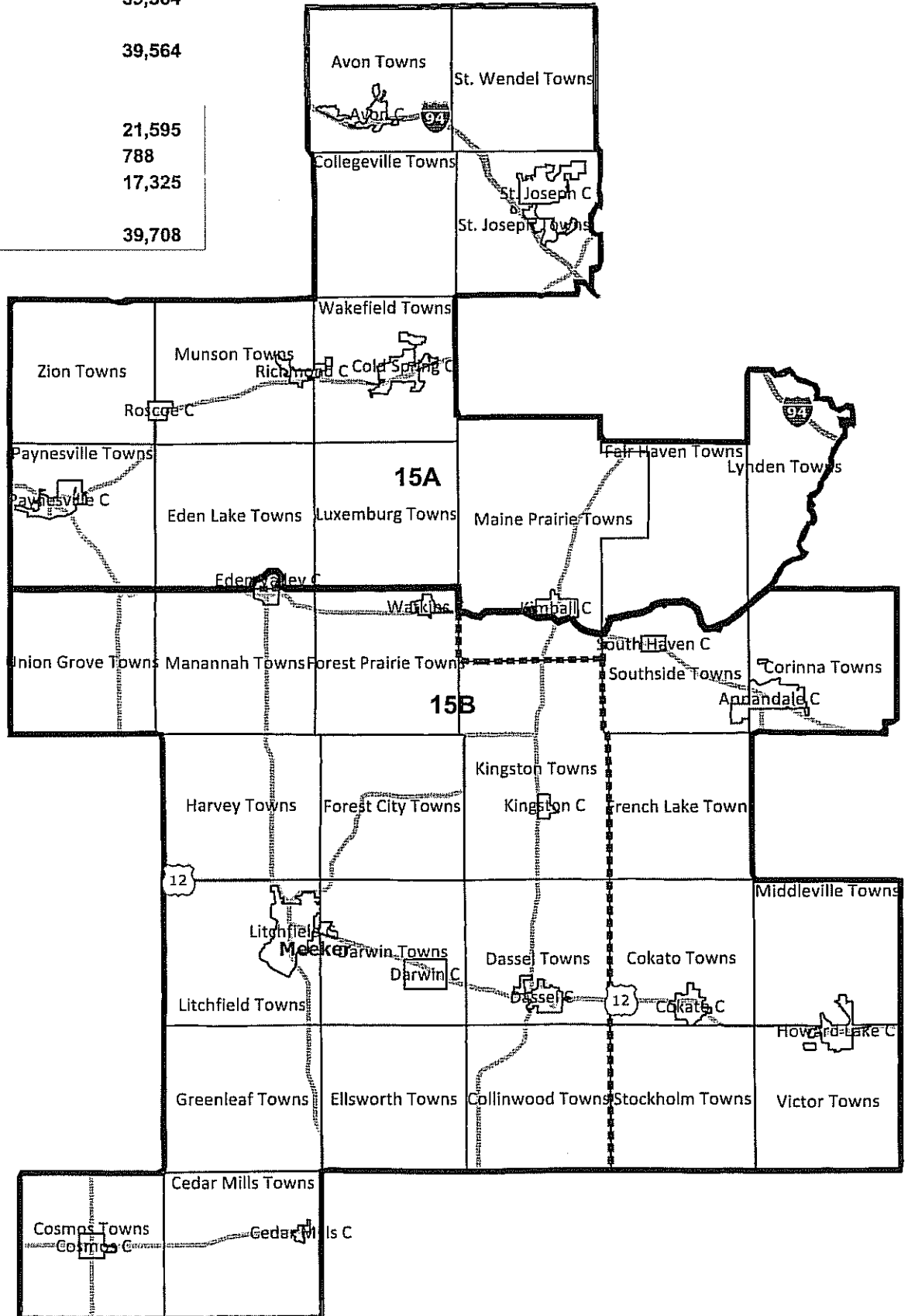
F2	F11
District 14A	
Benton County (part)	5,913
Sherburne County (part)	8,116
Stearns County (part)	25,438
District 14A Subtotal	39,467
District 14B	
Stearns County	
MCD: Rockville City	2,448
MCD: St. Augusta City	3,317
MCD: St. Cloud City (part)	27,223
MCD: St. Joseph Twn (part)	10
Waite Park City (part)	6,715
Stearns County Subtotal	39,713
District 14B Subtotal	39,713



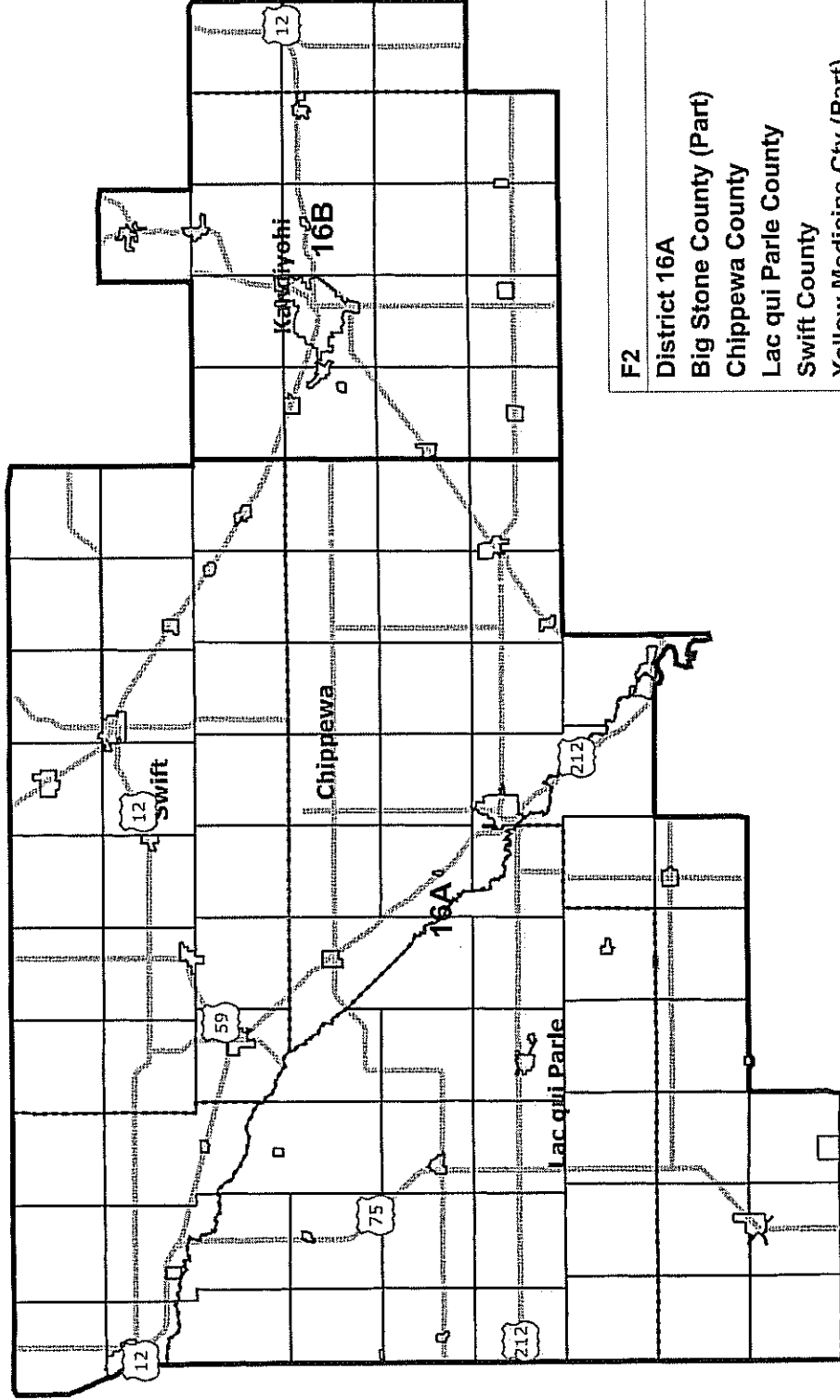
Britton et al State Legislative Plan

District 15A and 15B

F2	F11
District 15A	
Stearns County (part)	39,564
District 15A Subtotal	39,564
District 15B	
Meeker County (part)	21,595
Stearns County (part)	788
Wright County (part)	17,325
District 15B Subtotal	39,708

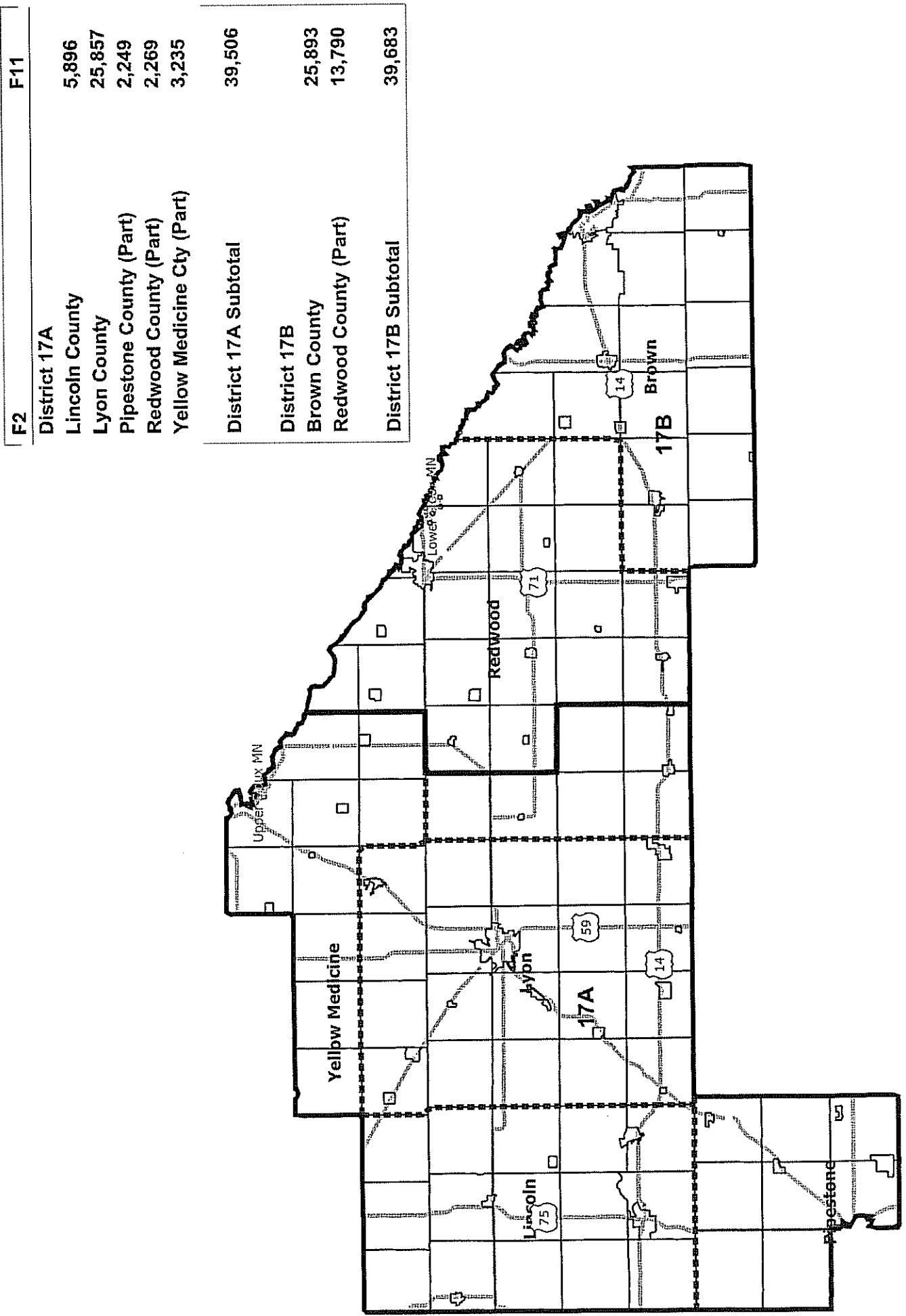


Britton et al State Legislative Plan District 16A and 16B



F2	F11
District 16A	2,921
Big Stone County (Part)	12,441
Chippewa County	7,259
Lac qui Parle County	9,783
Swift County	7,203
Yellow Medicine Cty (Part)	
District 16A Subtotal	39,607
District 16B	
Kandiyohi County (Part)	37,827
Meeker County (Part)	1,705
District 16B Subtotal	39,532

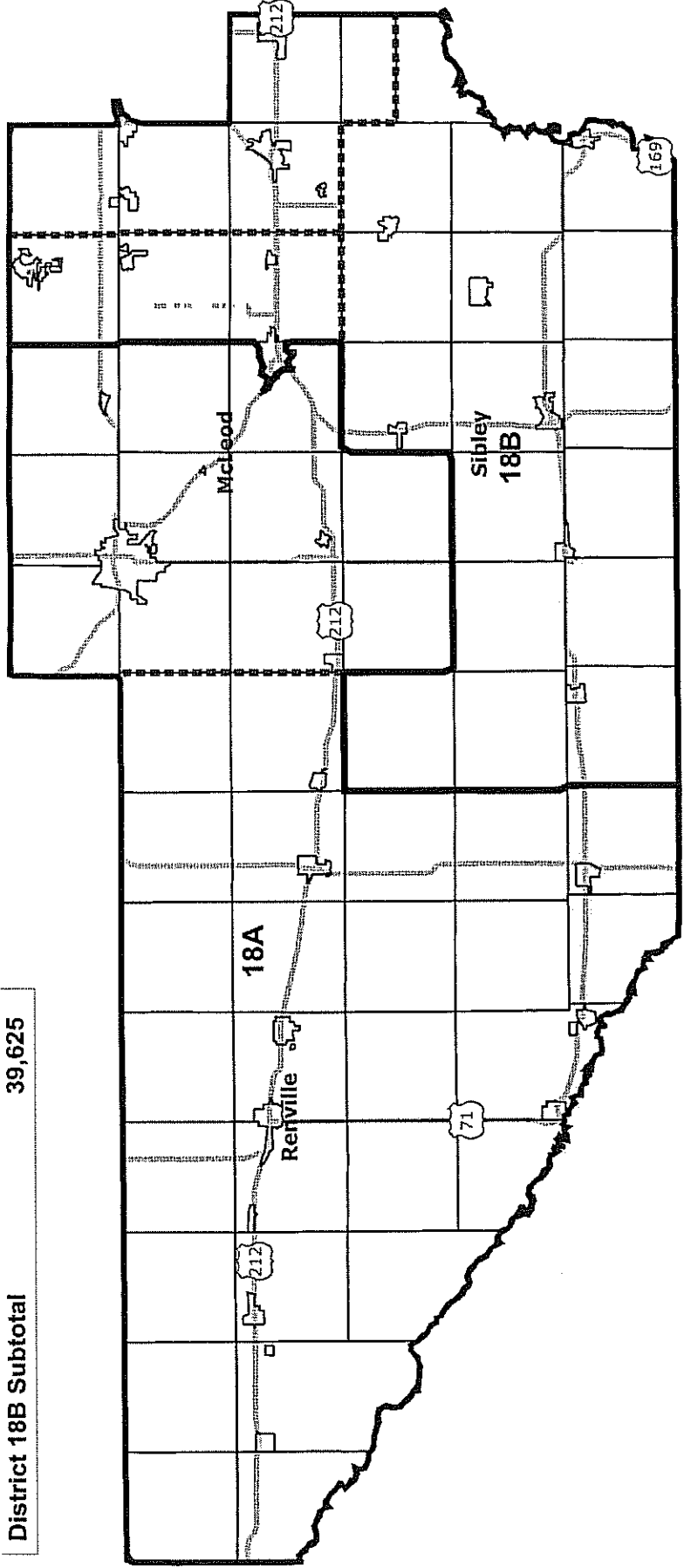
Britton et al State Legislative Plan District 17A and 17B



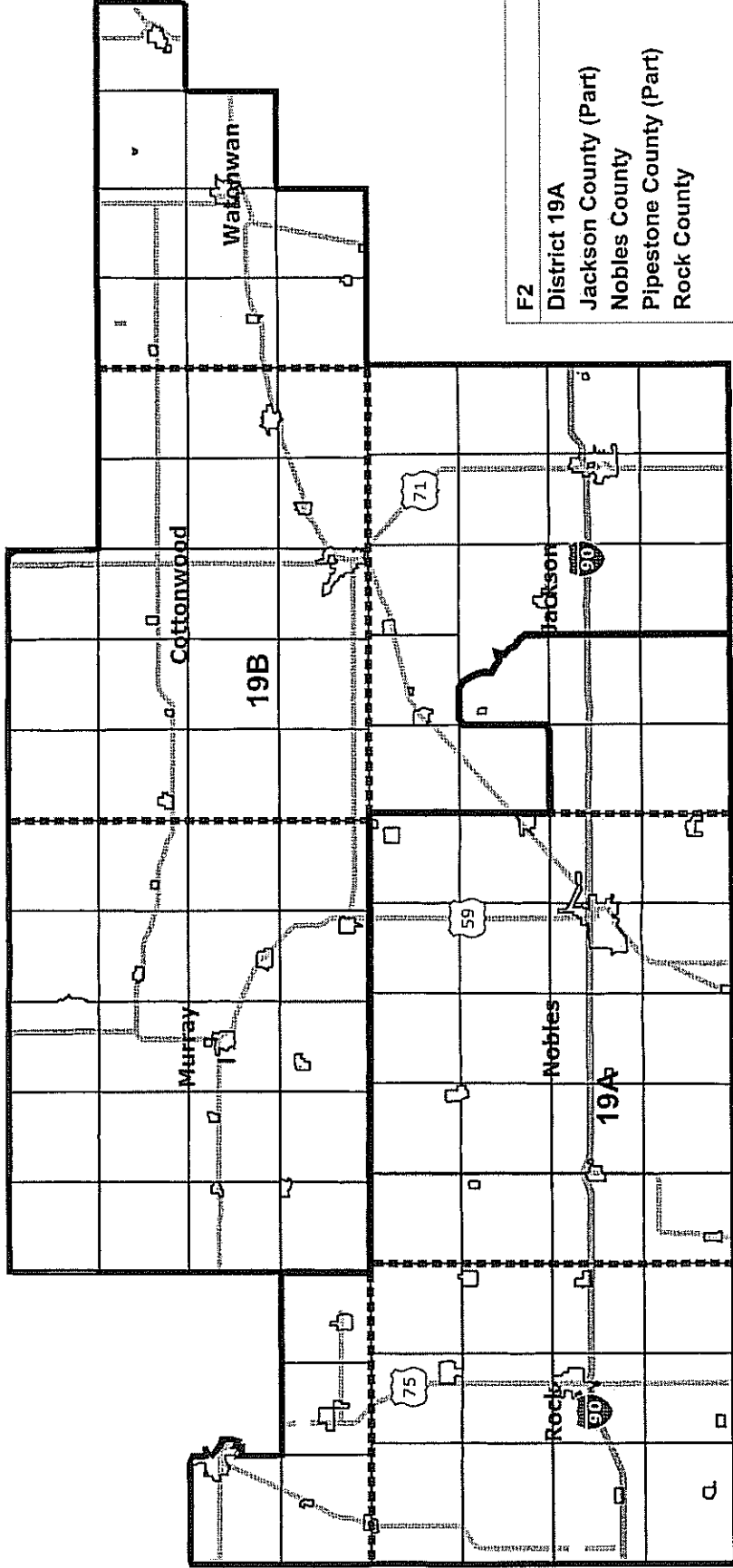
F2	F11
District 17A	5,896
Lincoln County	25,857
Lyon County	2,249
Pipestone County (Part)	2,269
Redwood County (Part)	3,235
Yellow Medicine Cty (Part)	
District 17A Subtotal	39,506
District 17B	25,893
Brown County	13,790
Redwood County (Part)	
District 17B Subtotal	39,683

Britton et al State Legislative Plan District 18A and 18B

F2	F11
District 18A	
McLeod County (Part)	23,778
Renville County	15,730
District 18A Subtotal	39,508
District 18B	
Carver County (Part)	11,526
McLeod County (Part)	12,873
Sibley County (Part)	15,226
District 18B Subtotal	39,625



Britton et al State Legislative Plan District 19A and 19B

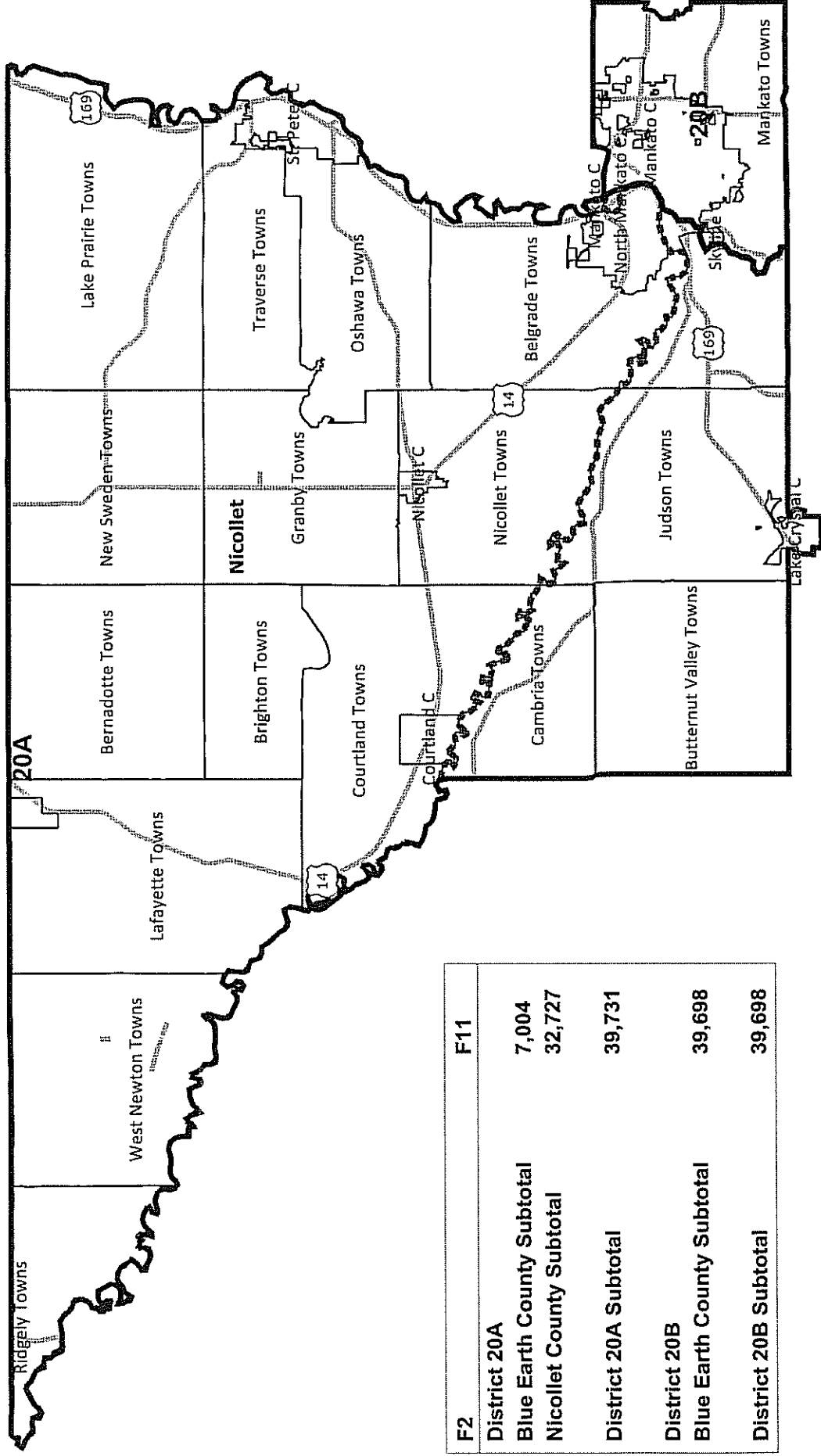


F2	F11
District 19A	1,182
Jackson County (Part)	21,378
Nobles County	7,347
Pipestone County (Part)	9,687
Rock County	39,594
District 19A Subtotal	39,594

District 19B	11,687
Cottonwood County	9,084
Jackson County (Part)	8,725
Murray County	10,230
Watonwan County (Part)	

District 19B Subtotal 39,726

Britton et al State Legislative Plan District 20A and 20B

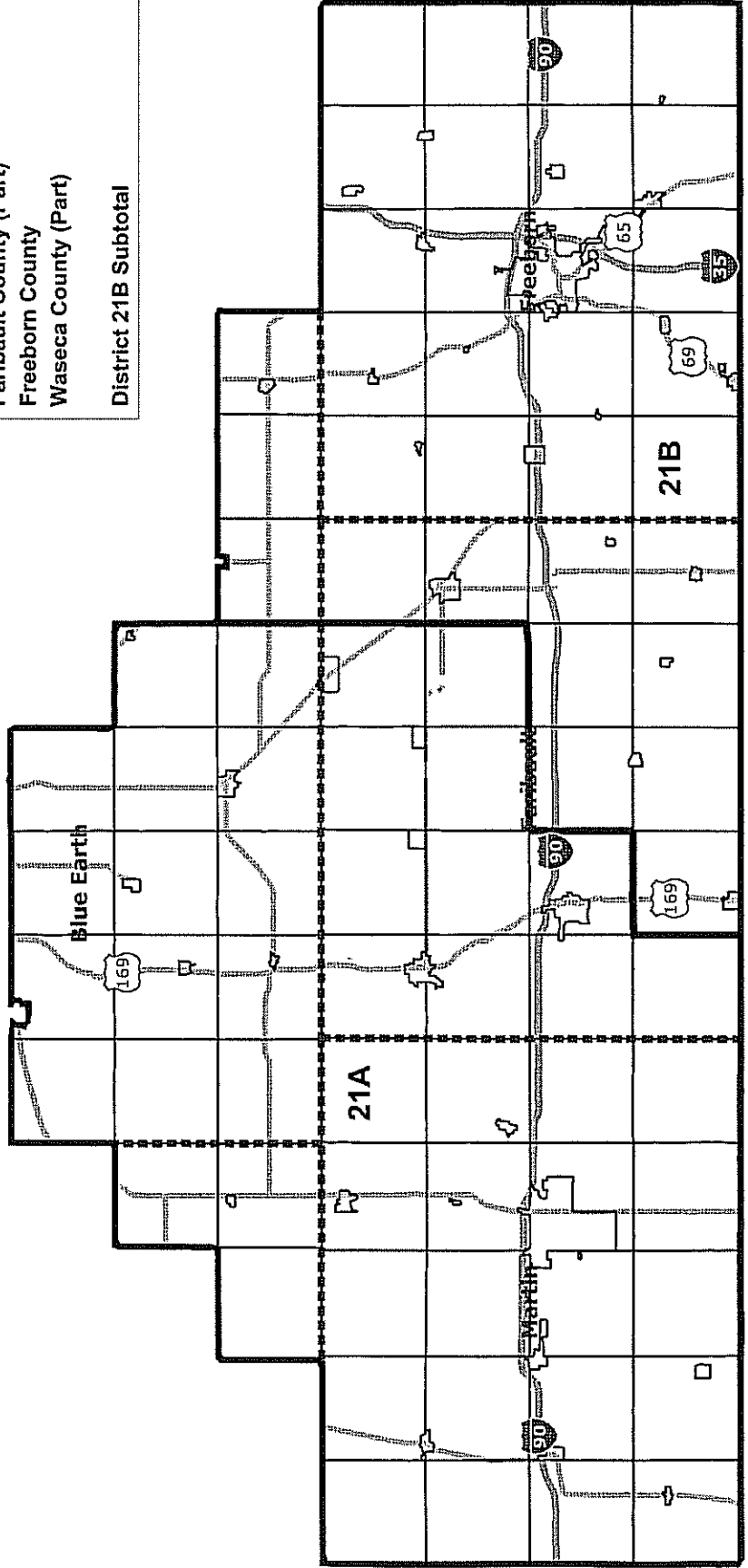


F2	F11
District 20A	
Blue Earth County Subtotal	7,004
Nicollet County Subtotal	32,727
District 20A Subtotal	39,731
District 20B	
Blue Earth County Subtotal	39,698
District 20B Subtotal	39,698

Britton et al State Legislative Plan

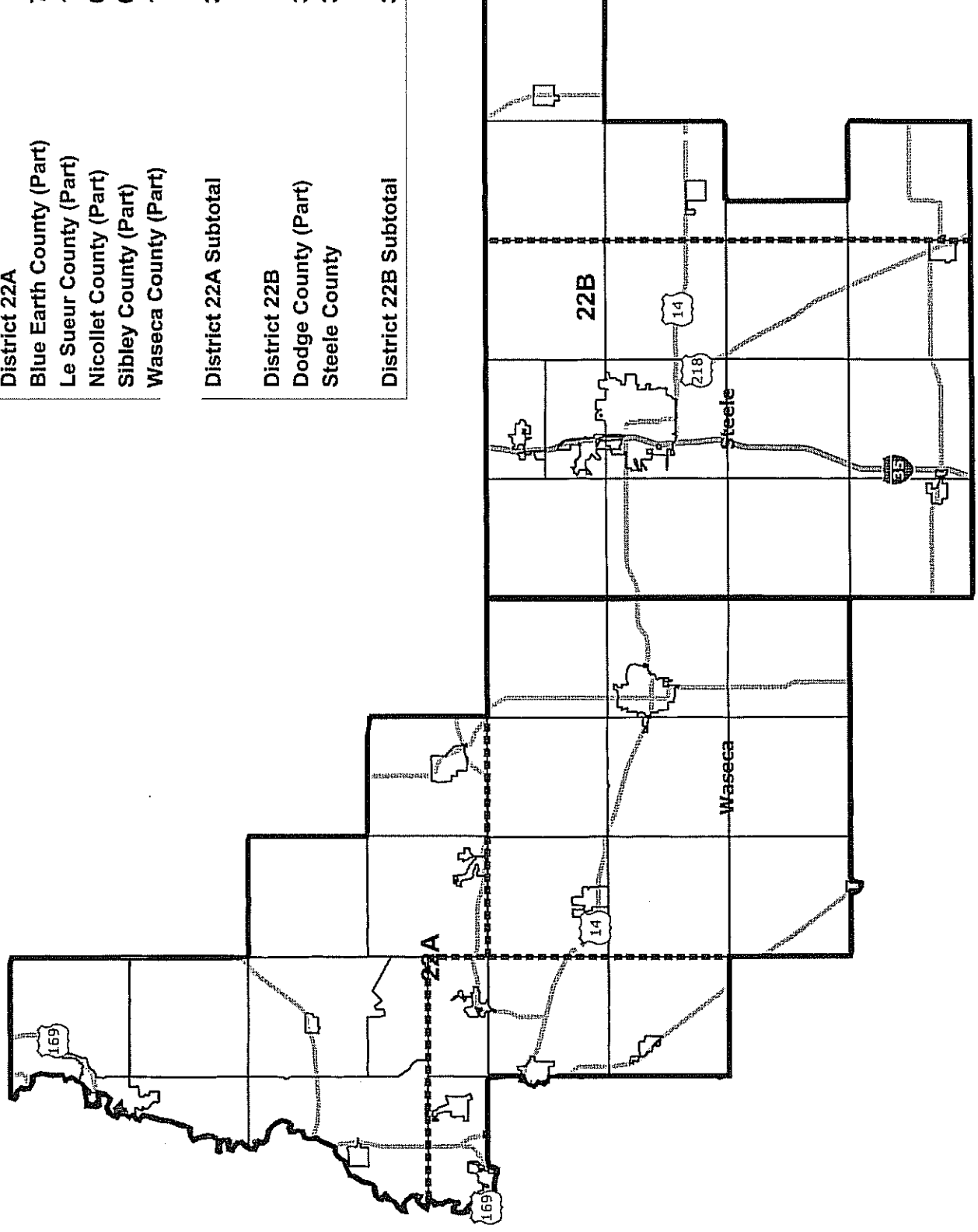
District 21A and 21B

F2	F11
District 21A	
Blue Earth County (Part)	9,473
Faribault County (Part)	8,410
Marlin County	20,840
Watowgan County (Part)	981
District 21A Subtotal	39,704
District 21B	
Faribault County (Part)	6,143
Freeborn County	31,255
Waseca County (Part)	2,135
District 21B Subtotal	39,533

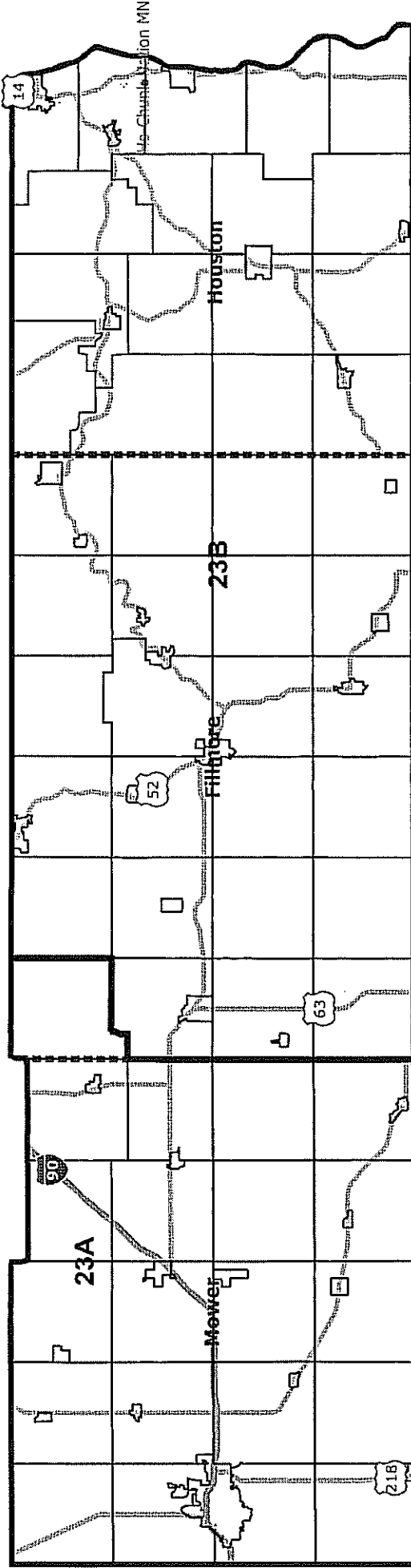


Britton et al State Legislative Plan District 22A and 22B

F2	F11
District 22A	
Blue Earth County (Part)	7,838
Le Sueur County (Part)	14,632
Nicollet County (Part)	0
Sibley County (Part)	0
Waseca County (Part)	17,001
District 22A Subtotal	39,471
District 22B	
Dodge County (Part)	3,132
Steele County	36,576
District 22B Subtotal	39,708



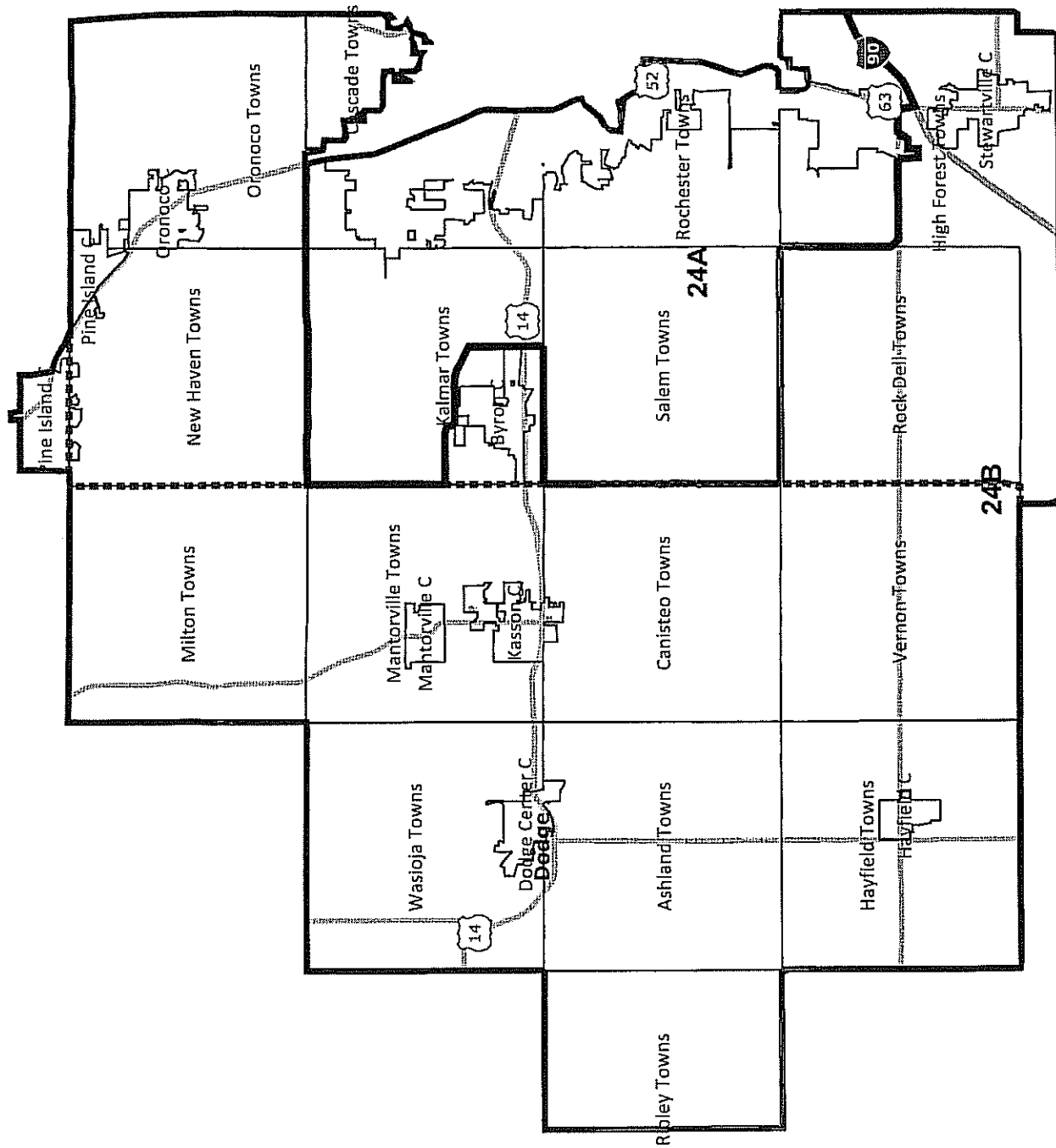
Britton et al State Legislative Plan District 23A and 23B



F2	F11
District 23A	
Fillmore County (Part)	458
Mower County	39,163
District 23A Subtotal	39,621
District 23B	
Fillmore County (Part)	20,408
Houston County	19,027
Winona County (Part)	0
District 23B Subtotal	39,435

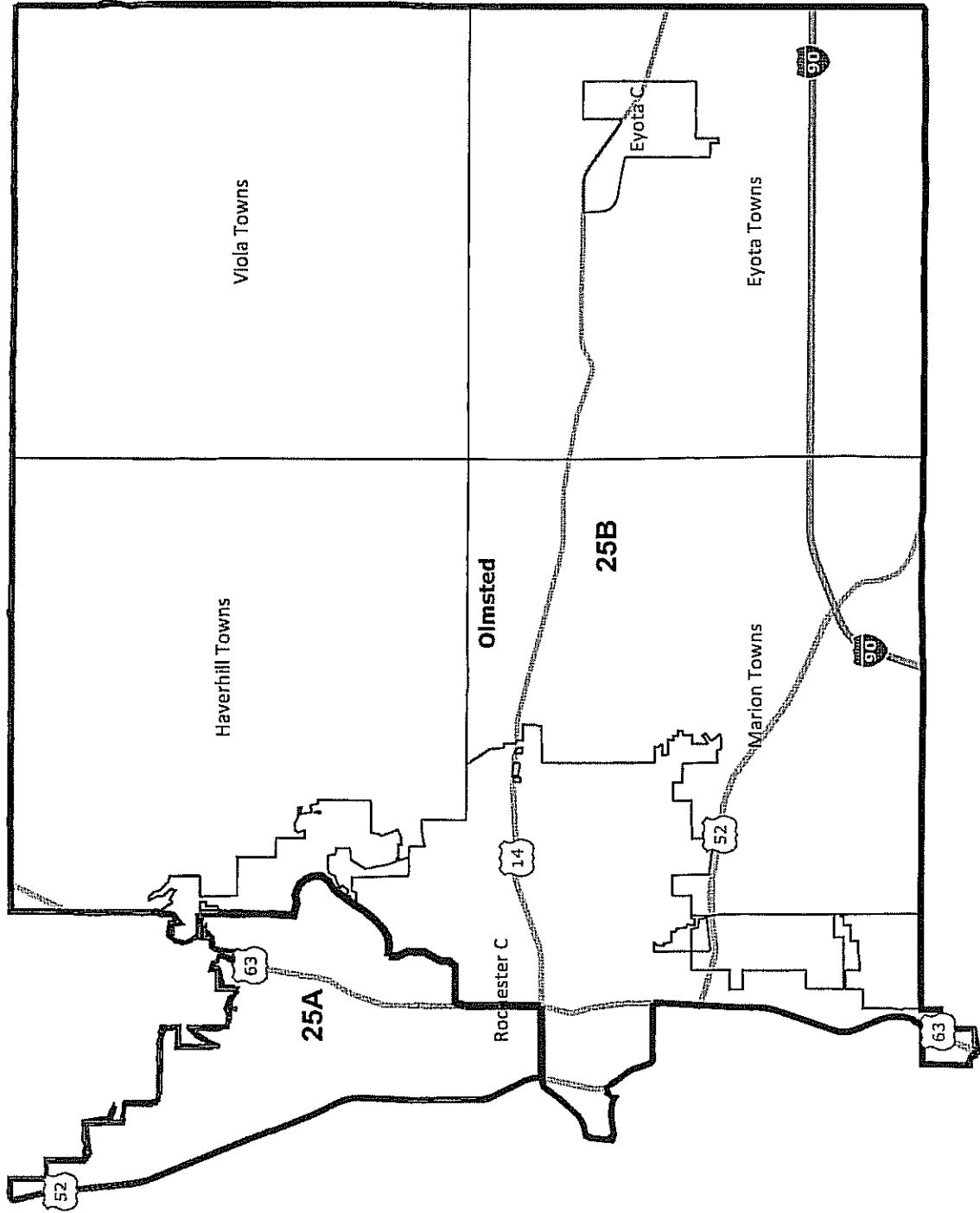
Britton et al State Legislative Plan

District 24A and 24B



F2	F11
District 24A	
Olmsted County	393
Cascade Township (part)	295
High Forest Twn (part)	827
Kalmar Township (part)	35,540
MCD: Rochester City (part)	1,574
Rochester Township (part)	1
Rock Dell Township (part)	1,086
MCD: Salem Township	39,716
Olmsted County (part)	
District 24A Subtotal	39,716
District 24B	
Dodge County (part)	16,955
Goodhue County (part)	2,570
Olmsted County (part)	20,205
District 24B Subtotal	39,730

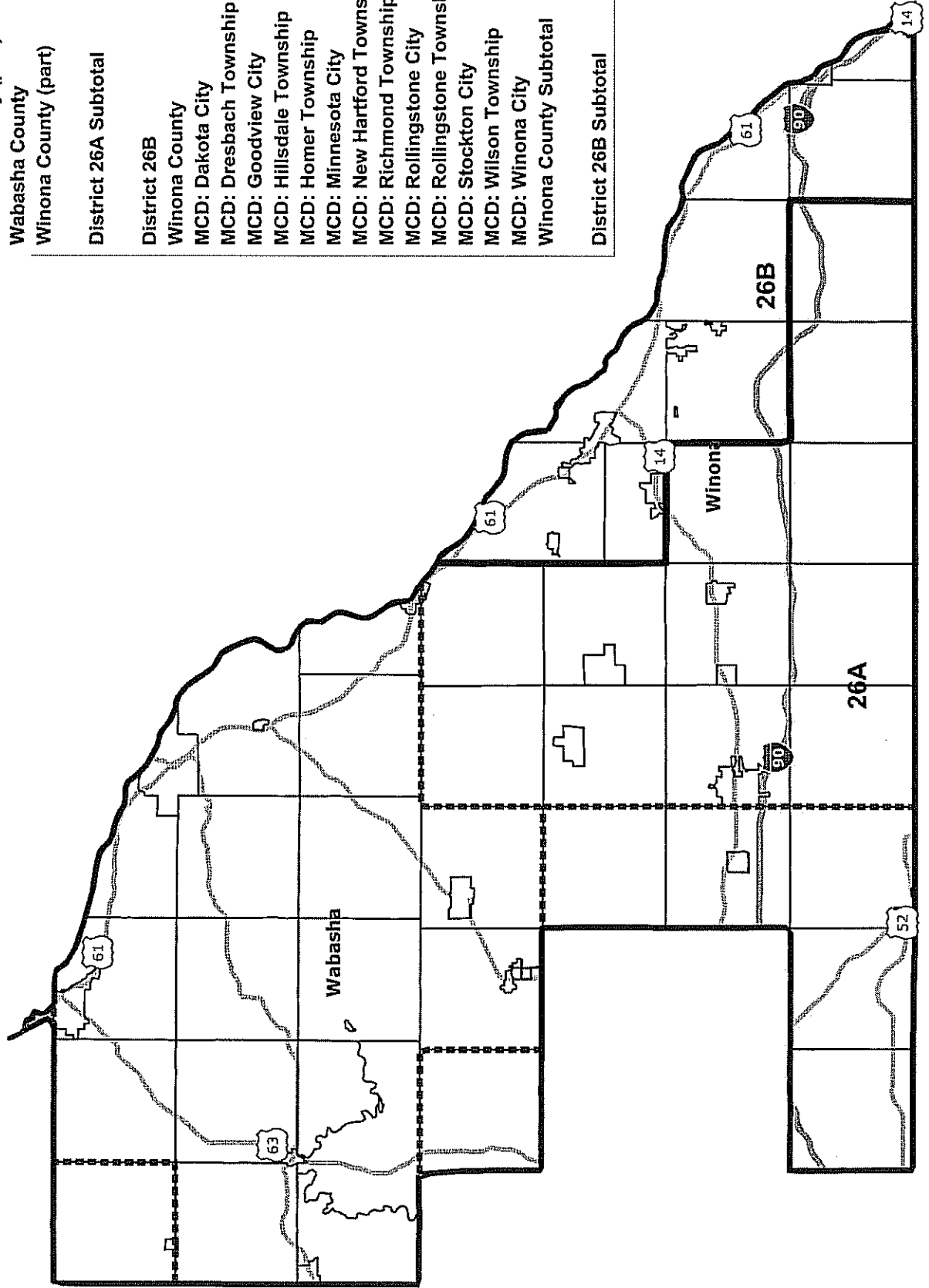
Britton et al State Legislative Plan District 25A and 25B



F2	F11
District 25A	
Olmsted County	
MCD: Cascade Twn (part)	0
MCD: Rochester City (part)	39,733
District 25A Subtotal	39,733
District 25B	
Olmsted County	
MCD: Eyota City	1,977
MCD: Eyota Township	464
MCD: Haverhill Township	1,495
MCD: Marion Township	3,653
MCD: Rochester City (part)	31,496
MCD: Rochester Twn (part)	55
MCD: Viola Township	589
District 25B Subtotal	39,729

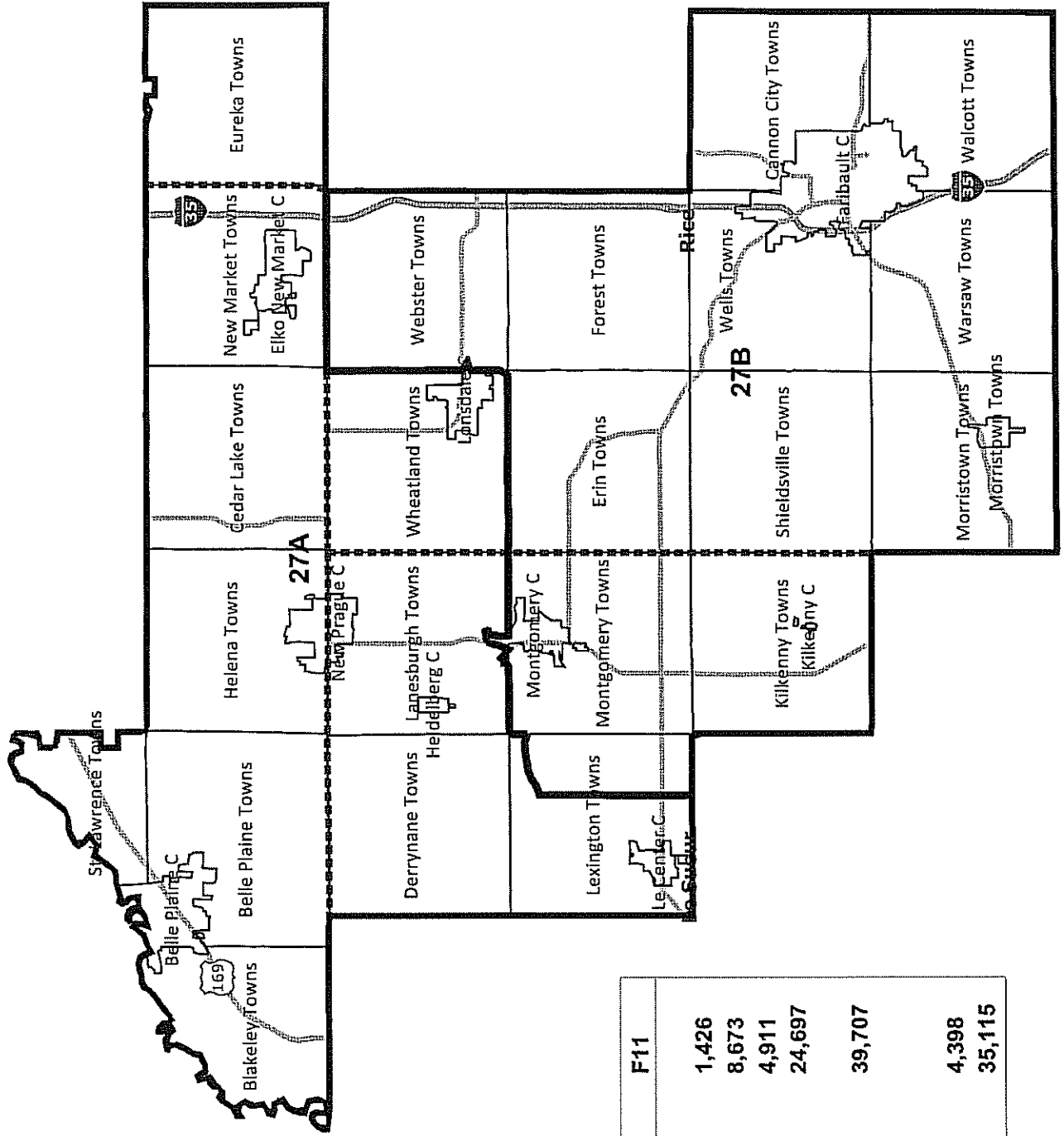
Britton et al State Legislative Plan District 26A and 26B

F2	F11
District 26A	1,342
Goodhue County (part)	4,865
Olmsted County (part)	21,676
Wabasha County	11,754
Winona County (part)	39,637
District 26A Subtotal	39,637
District 26B	323
Winona County	456
MCD: Dakota City	4,036
MCD: Dresbach Township	912
MCD: Goodview City	1,356
MCD: Hillside Township	204
MCD: Homer Township	890
MCD: Minnesota City	699
MCD: New Hartford Township	664
MCD: Richmond Township	701
MCD: Rollingstone City	697
MCD: Rollingstone Township	1,177
MCD: Stockton City	27,592
MCD: Wilson Township	39,707
MCD: Winona City	39,707
Winona County Subtotal	39,707
District 26B Subtotal	39,707



Britton et al State Legislative Plan

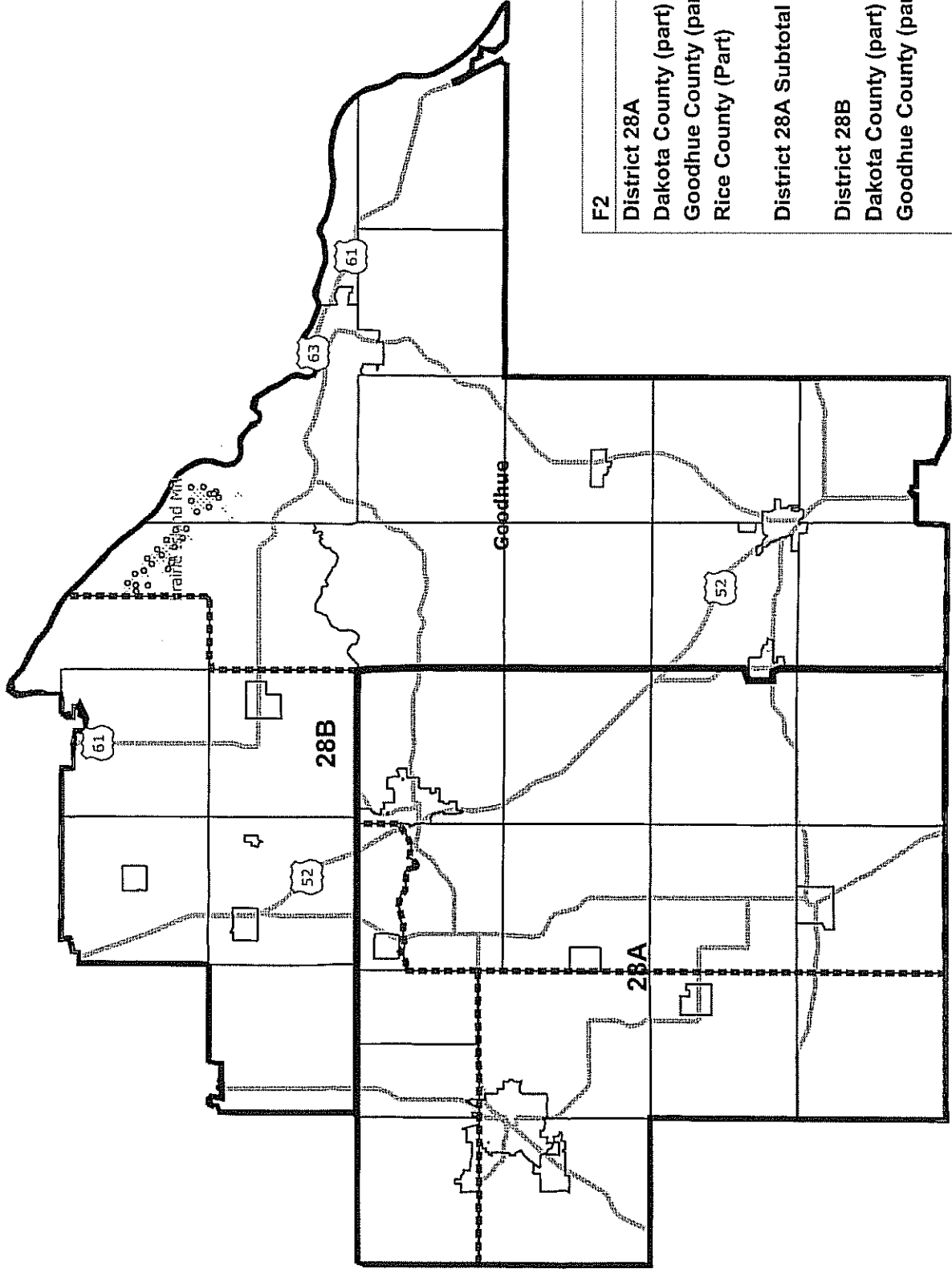
District 27A and 27B



F2	F11
District 27A	
Dakota County (part)	1,426
Le Sueur County (part)	8,673
Rice County (part)	4,911
Scott County (part)	24,697
District 27A Subtotal	39,707
District 27B	
Le Sueur County (part)	4,398
Rice County (part)	35,115

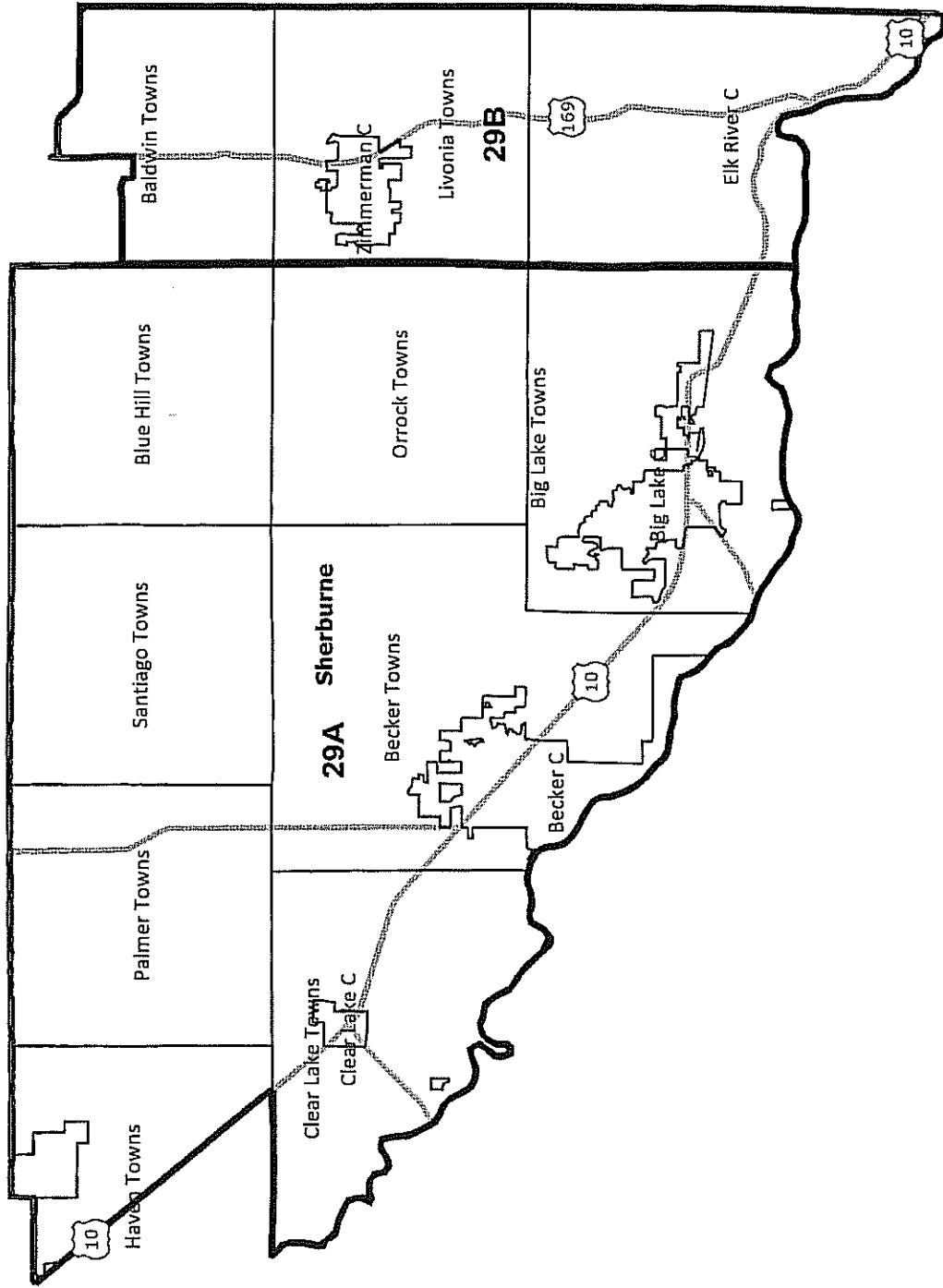
Britton et al State Legislative Plan

District 28A and 28B



F2	F11
District 28A	3,956
Dakota County (part)	11,489
Goodhue County (part)	24,116
Rice County (Part)	39,561
District 28A Subtotal	8,913
District 28B	30,782
Dakota County (part)	39,695
Goodhue County (part)	
District 28B Subtotal	

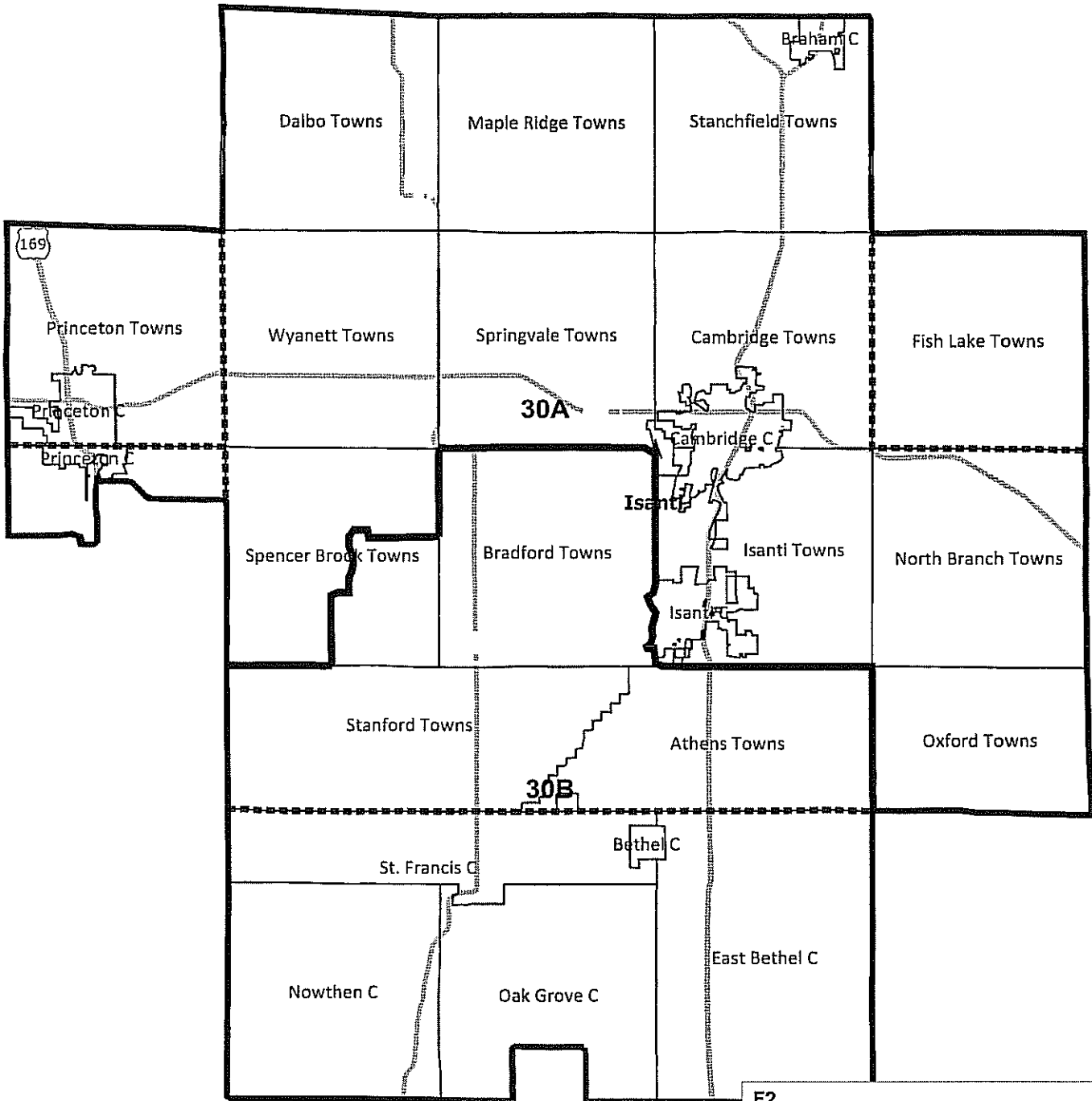
Britton et al State Legislative Plan District 29A and 29B



F2	F11
District 29A	
Sherburne County	
MCD: Becker Township	4,538
MCD: Big Lake City	4,842
MCD: Big Lake Township	10,060
MCD: Blue Hill Township	7,386
MCD: Clear Lake City	2,176
MCD: Clear Lake Township	545
MCD: Haven Township (part)	1,539
MCD: Orrock Township	652
MCD: Palmer Township	3,451
MCD: Santiago Township	2,354
MCD: St. Cloud City (part)	1,895
Sherburne County Subtotal	3
District 29A Subtotal	39,441
District 29B	
Sherburne County	
MCD: Baldwin Twn (part)	5,563
MCD: Elk River City	22,974
MCD: Livonia Township	5,951
MCD: Zimmerman City	5,228
Sherburne County Subtotal	39,716
District 29B Subtotal	39,716

Britton et al State Legislative Plan

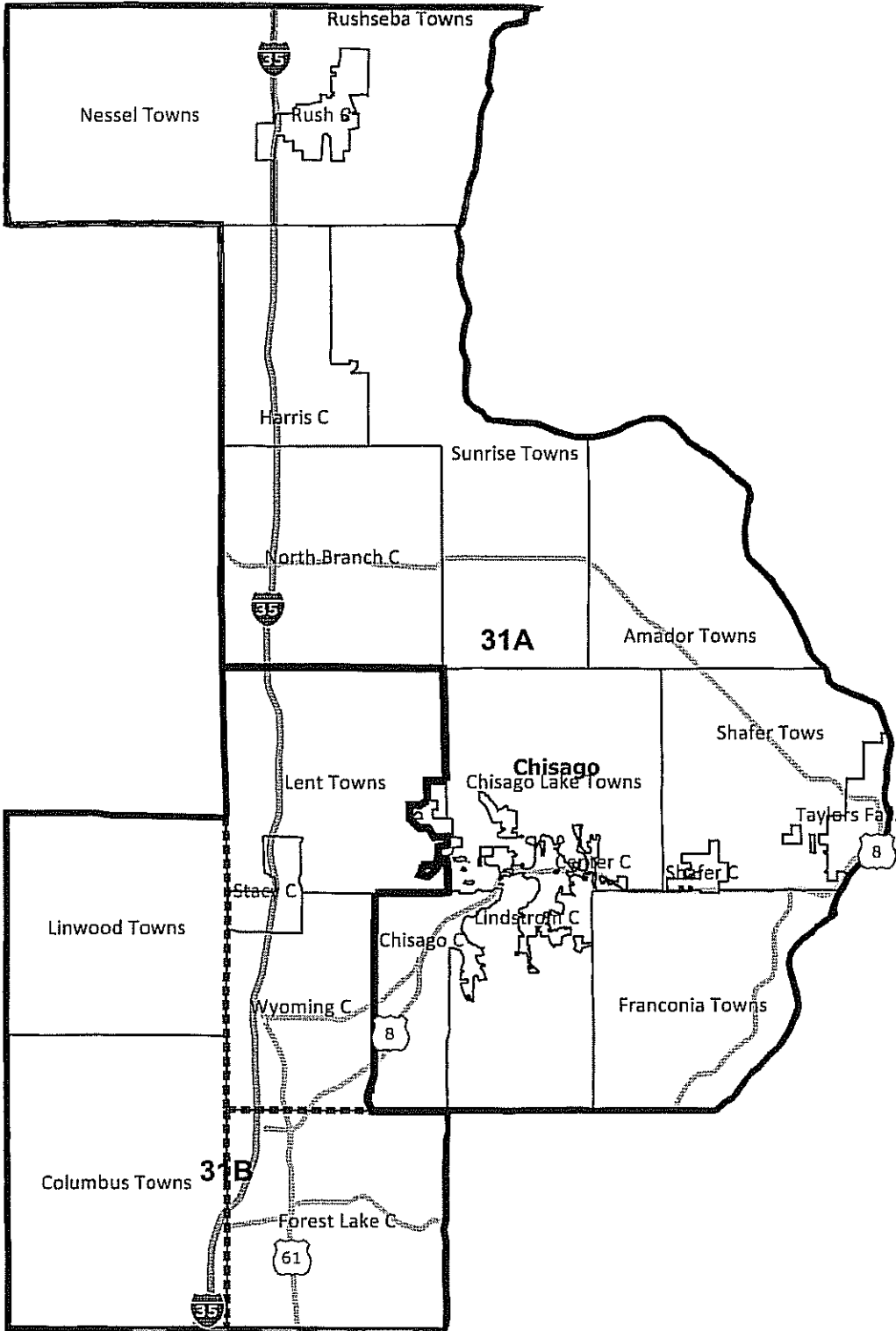
District 30A and 30B



F2	F11
District 30A	
Chisago County (part)	2,012
Isanti County (part)	29,527
Mille Lacs County (part)	6,904
Sherburne County (part)	1,226
District 30A Subtotal	39,669
District 30B	
Anoka County (part)	31,251
Isanti County (part)	8,289
District 30B Subtotal	39,540

Britton et al State Legislative Plan

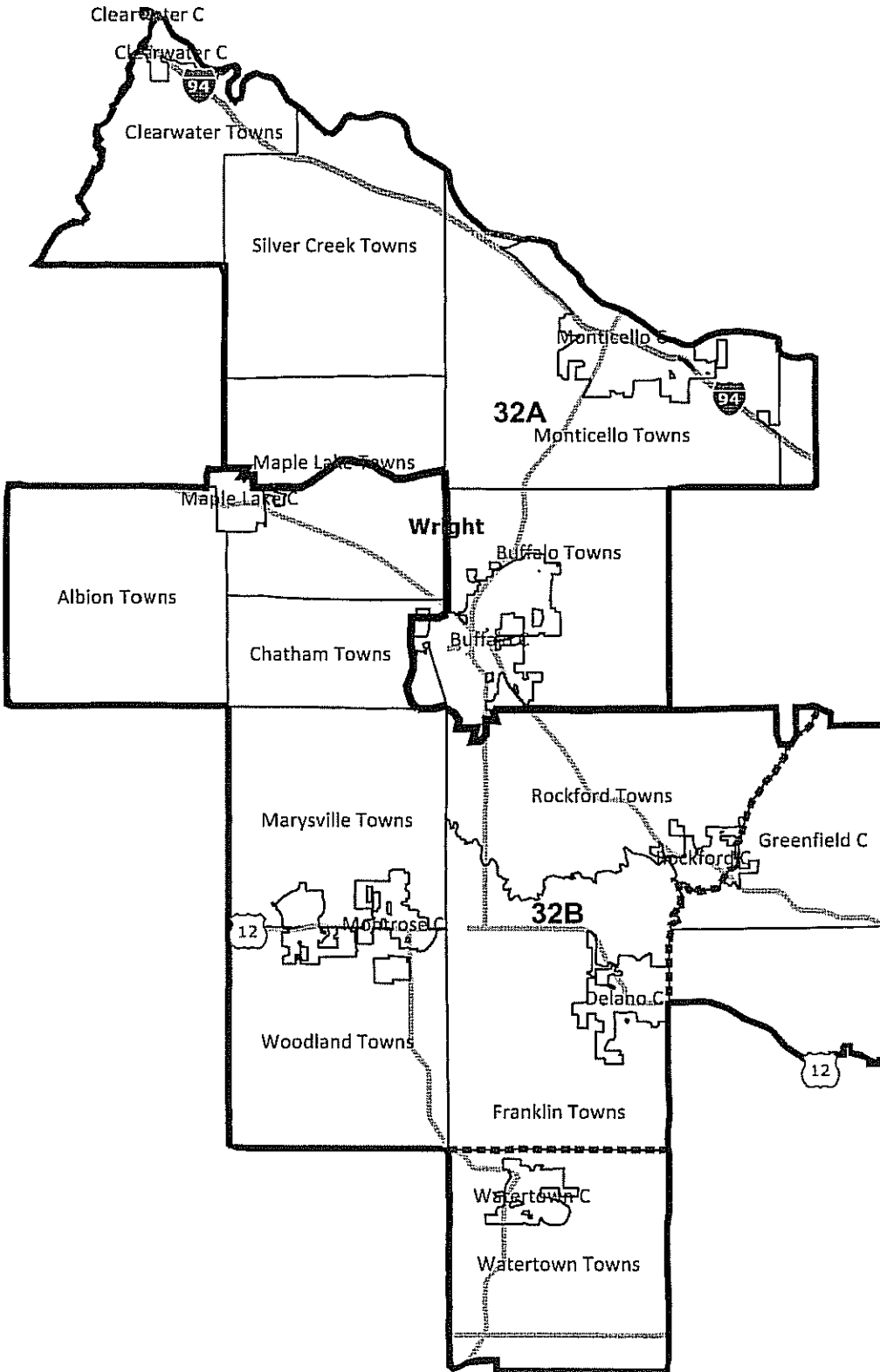
District 31A and 31B



F2	F11
District 31A	
Chisago County	
MCD: Amador Township	885
MCD: Center City	628
MCD: Chisago City	4,967
MCD: Chisago Lake Township	4,656
MCD: Franconia Township	1,805
MCD: Harris City	1,132
MCD: Lent Township (part)	37
MCD: Lindstrom City	4,442
MCD: Nessel Township	1,951
MCD: North Branch City	10,125
MCD: Rush City	3,079
MCD: Rushseba Township	804
MCD: Shafer City	1,045
MCD: Shafer Township	1,048
MCD: Sunrise Township	1,994
MCD: Taylors Falls City	976
District 31A Subtotal	39,574
District 31B	
Anoka County	
MCD: Columbus Township	3,914
MCD: Linwood Township	5,123
Anoka County Subtotal	9,037
Chisago County	
MCD: Lent Township (part)	3,054
MCD: Stacy City	1,456
MCD: Wyoming City	7,791
Chisago County Subtotal	12,301
Washington County	
MCD: Forest Lake City	18,375
Washington County Subtotal	18,375
District 31B Subtotal	39,713

Britton et al State Legislative Plan

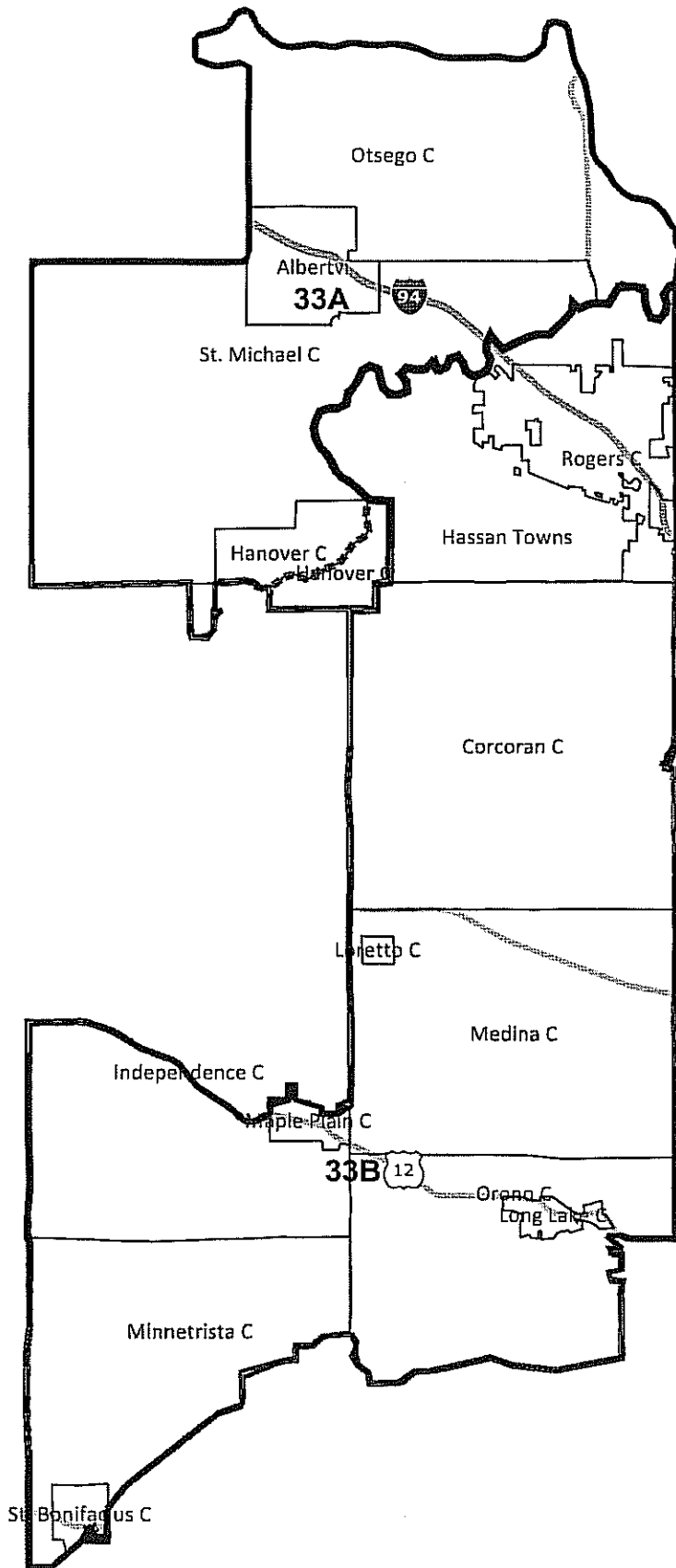
District 32A and 32B



F2	F11
District 32A	
Stearns County	
MCD: Clearwater City	0
Stearns County Subtotal	0
Wright County	
MCD: Buffalo City (part)	15,364
MCD: Buffalo Township	1,804
MCD: Chatham Twn (part)	80
MCD: Clearwater City (part)	1,735
MCD: Clearwater Township	1,306
MCD: Maple Lake Twn (part)	677
MCD: Monticello City	12,759
MCD: Monticello Township	3,181
MCD: Otsego City (part)	213
MCD: Silver Creek Township	2,335
Wright County Subtotal	39,454
District 32A Subtotal	39,454
District 32B	
Carver County	
MCD: Watertown City	4,205
MCD: Watertown Township	1,204
Carver County Subtotal	5,409
Hennepin County	
MCD: Greenfield City	2,777
Independence City (part)	2,140
MCD: Rockford City (part)	426
Hennepin County Subtotal	5,343
Wright County	
MCD: Albion Township	1,255
MCD: Buffalo City (part)	89
MCD: Chatham Twn (part)	1,222
MCD: Delano City	5,464
MCD: Franklin Township	2,760
MCD: Maple Lake City	2,059
MCD: Maple Lake Twn (part)	1,371
MCD: Marysville Township	2,147
MCD: Montrose City	2,847
MCD: Rockford City	3,890
MCD: Rockford Township	3,194
MCD: Waverly City	1,357
MCD: Woodland Township	1,082
Wright County Subtotal	28,737
District 32B Subtotal	39,489

Britton et al State Legislative Plan

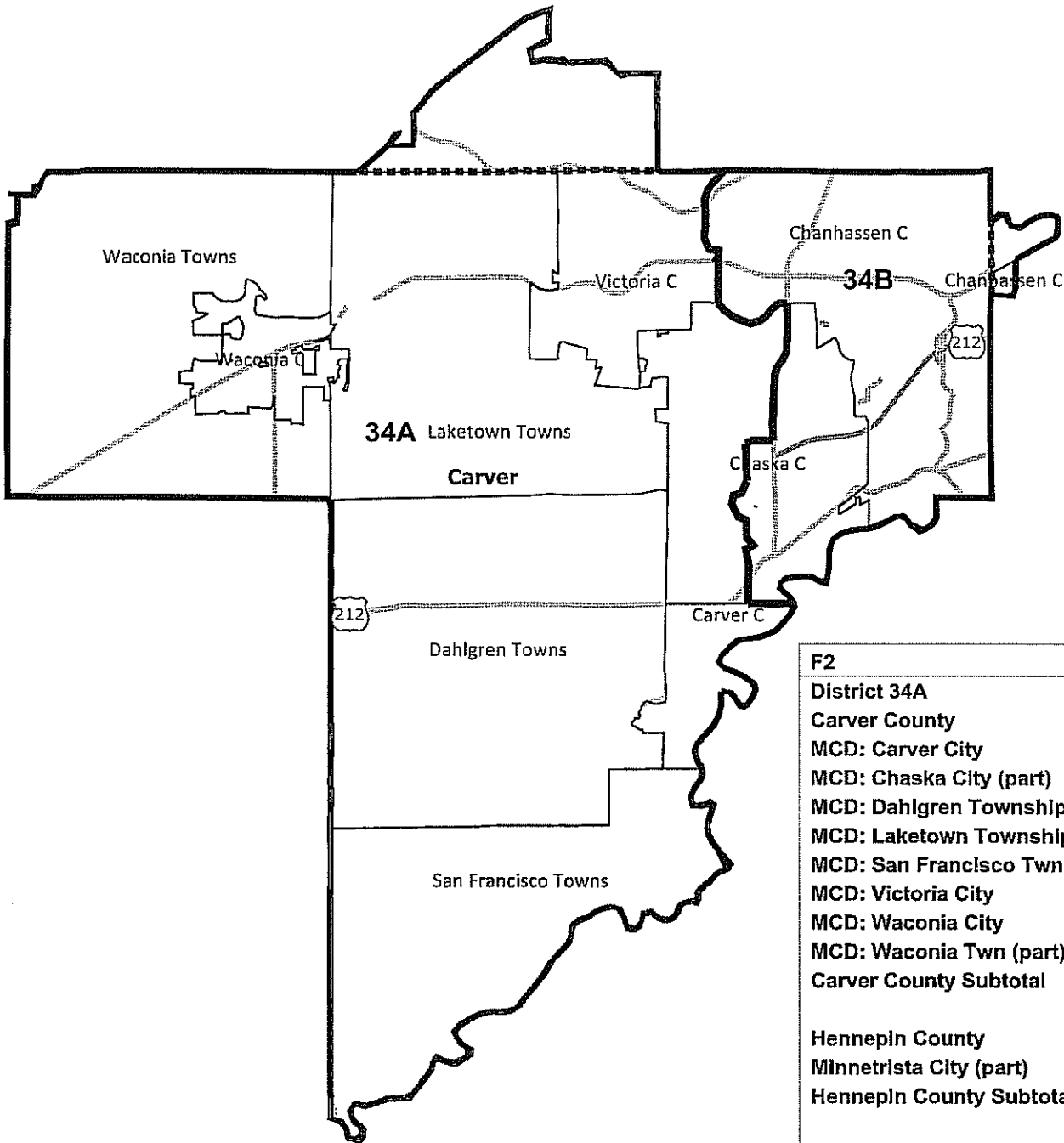
District 33A and 33B



F2	F11
District 33A	
Hennepin County	
MCD: Hanover City (part)	609
Hennepin County Subtotal	609
Wright County	
MCD: Albertville	7,044
MCD: Hanover City	2,329
MCD: Otsego City (part)	13,358
MCD: St. Michael City	16,399
Wright County Subtotal	39,130
District 33A Subtotal	39,739
District 33B	
Hennepin County	
MCD: Corcoran City	5,379
MCD: Hassan Township	2,600
MCD: Independence City (part)	1,364
MCD: Long Lake City	1,768
MCD: Loretto City	650
MCD: Maple Plain City	1,768
MCD: Medina City	4,892
MCD: Minnetrista City (part)	4,173
MCD: Orono City (part)	6,121
MCD: Rogers City	8,597
MCD: St. Bonifacius City	2,283
Hennepin County Subtotal	39,595
District 33B Subtotal	39,595

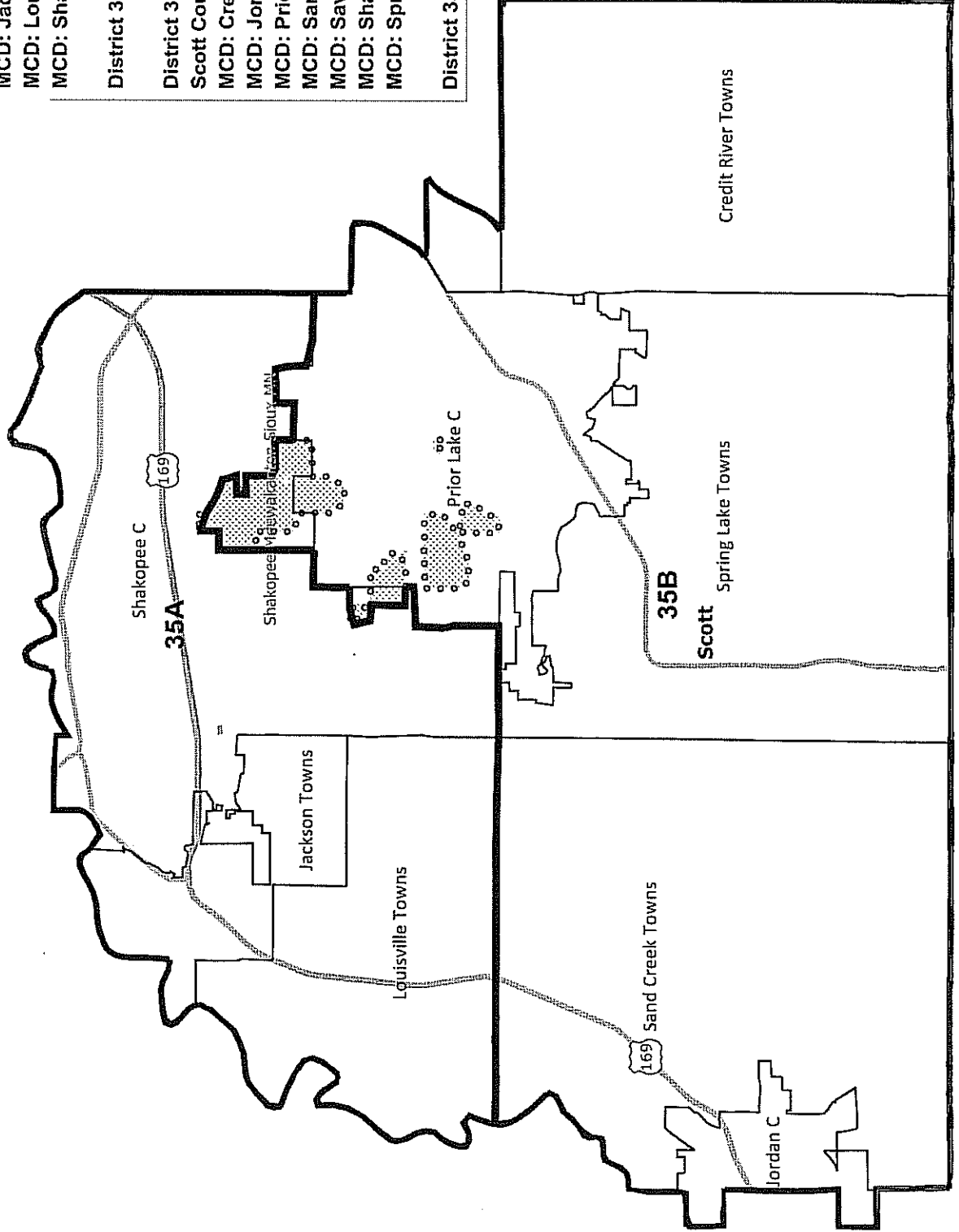
Britton et al State Legislative Plan

District 34A and 34B



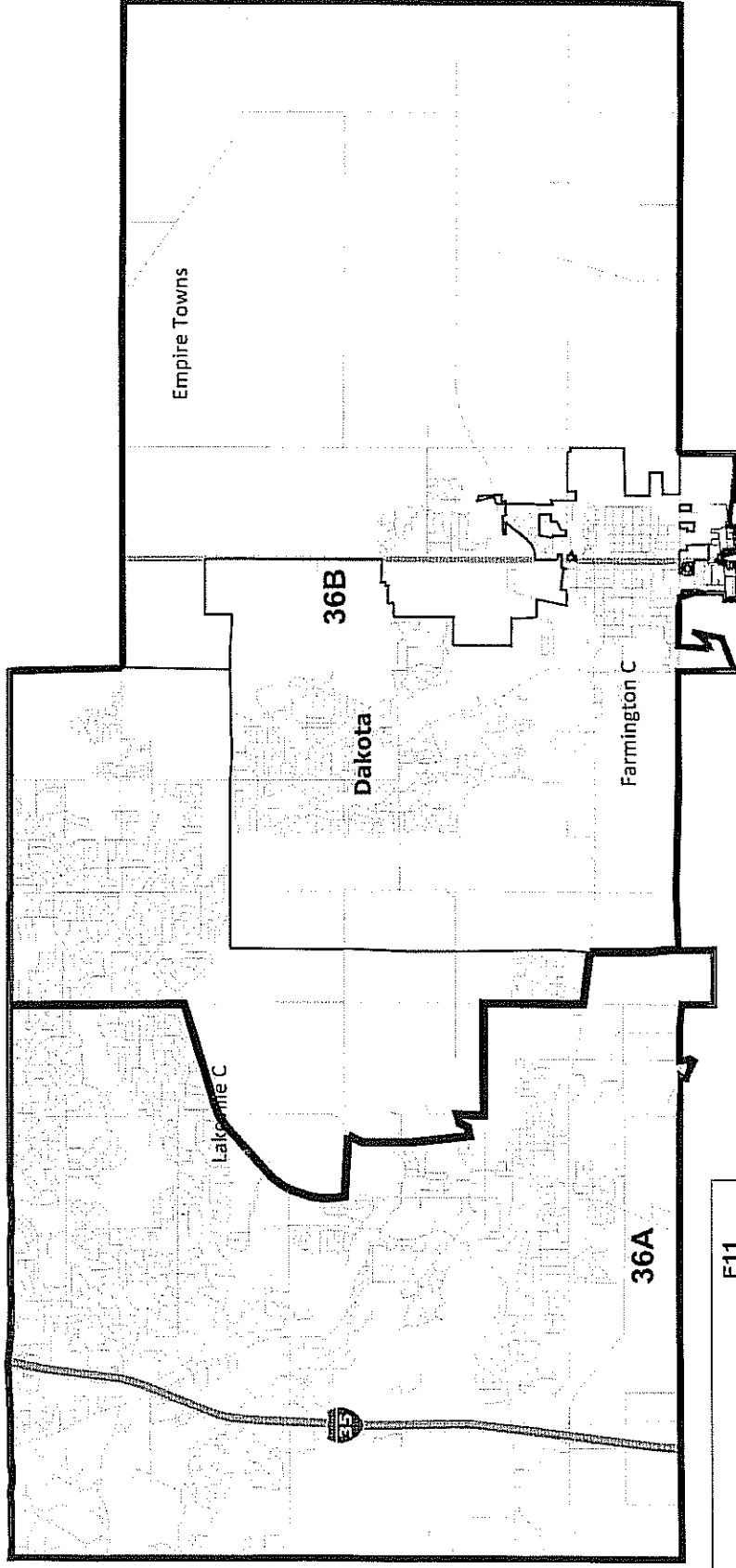
F2	F11
District 34A	
Carver County	
MCD: Carver City	3,724
MCD: Chaska City (part)	10,095
MCD: Dahlgren Township	1,331
MCD: Laketown Township	2,243
MCD: San Francisco Twn	832
MCD: Victoria City	7,345
MCD: Waconia City	10,697
MCD: Waconia Twn (part)	1,213
Carver County Subtotal	37,480
Hennepin County	
Minnetrista City (part)	2,211
Hennepin County Subtotal	2,211
District 34A Subtotal	39,691
District 34B	
Carver County	
MCD: Chanhassen City	22,952
MCD: Chaska City (part)	13,675
Carver County Subtotal	36,627
Hennepin County	
Chanhassen City (part)	0
Eden Prairie City (part)	2,957
Hennepin County Subtotal	2,957
District 34B Subtotal	39,584

Britton et al State Legislative Plan District 35A and 35B



F2	F11
District 35A	
Scott County	
MCD: Jackson Township	1,464
MCD: Louisville Township	1,266
MCD: Shakopee City (part)	36,869
District 35A Subtotal	39,599
District 35B	
Scott County	
MCD: Credit River Township	5,096
MCD: Jordan City	5,470
MCD: Prior Lake City	22,796
MCD: Sand Creek Township	1,521
MCD: Savage City (part)	707
MCD: Shakopee City (part)	207
MCD: Spring Lake Township	3,631
District 35B Subtotal	39,428

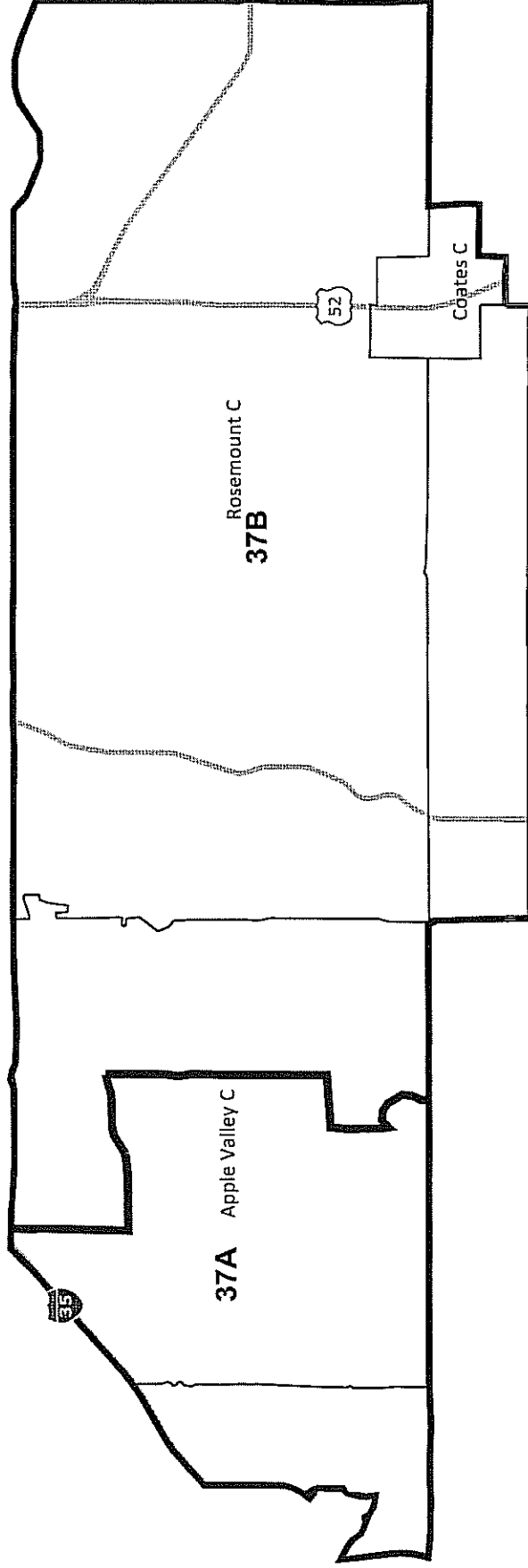
Britton et al State Legislative Plan District 36A and 36B



F2	F11
District 36A	
Dakota County	
MCD: Lakeville City (part)	39,734
District 36A Subtotal	39,734
District 36B	
Dakota County	
MCD: Castle Rock Township	27
MCD: Empire Twn (part)	2,394
MCD: Farmington City	21,086
MCD: Lakeville City (part)	16,220
District 36B Subtotal	39,727

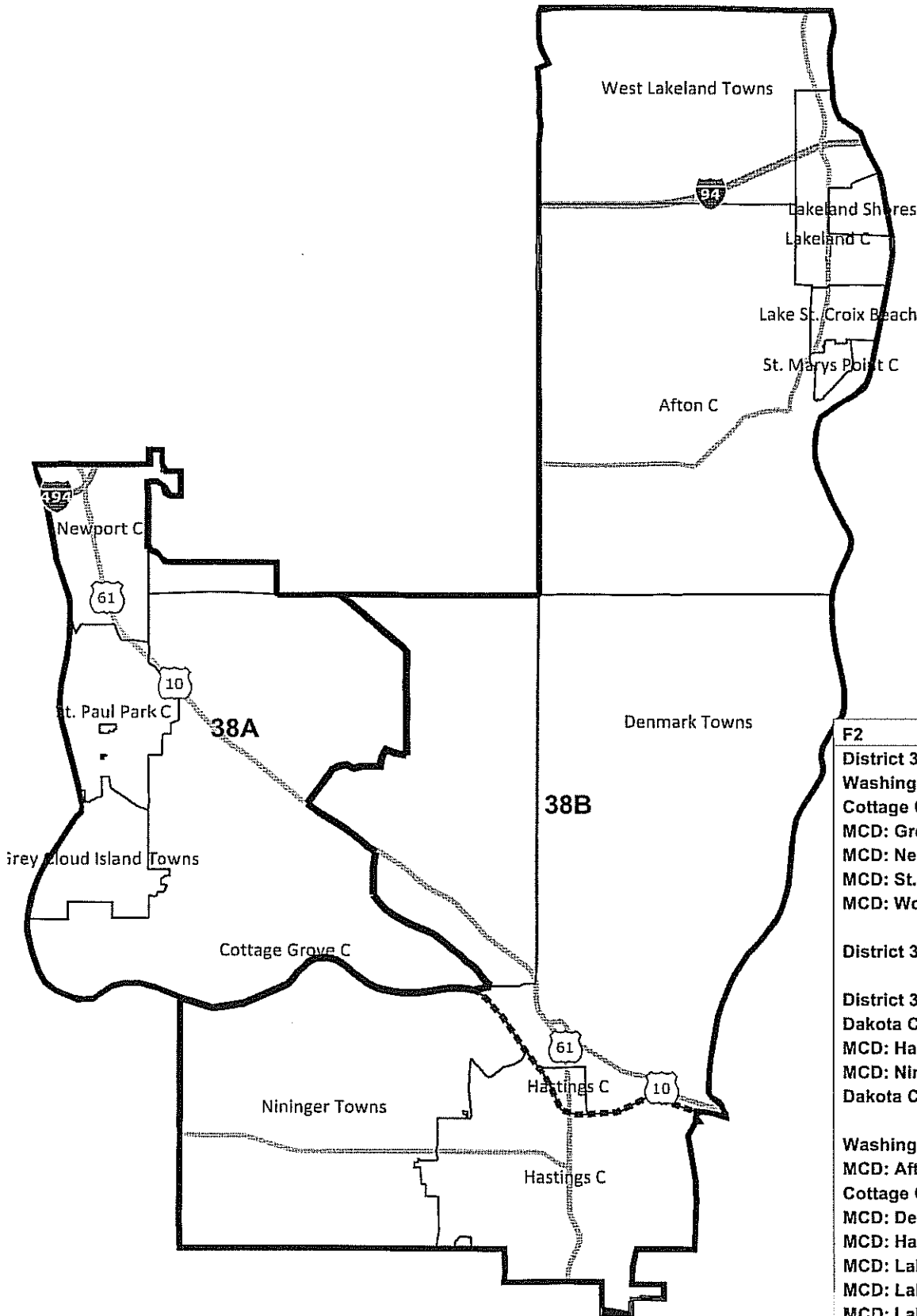
Britton et al State Legislative Plan

District 37A and 37B



F2	F11
District 37A	
Dakota County	
Apple Valley City (part)	31,499
Burnsville City (part)	8,120
District 37A Subtotal	39,619
District 37B	
Dakota County	
Apple Valley City (part)	17,585
Coates City	161
Empire Township (part)	50
Rosemount City	21,874
District 37B Subtotal	39,670

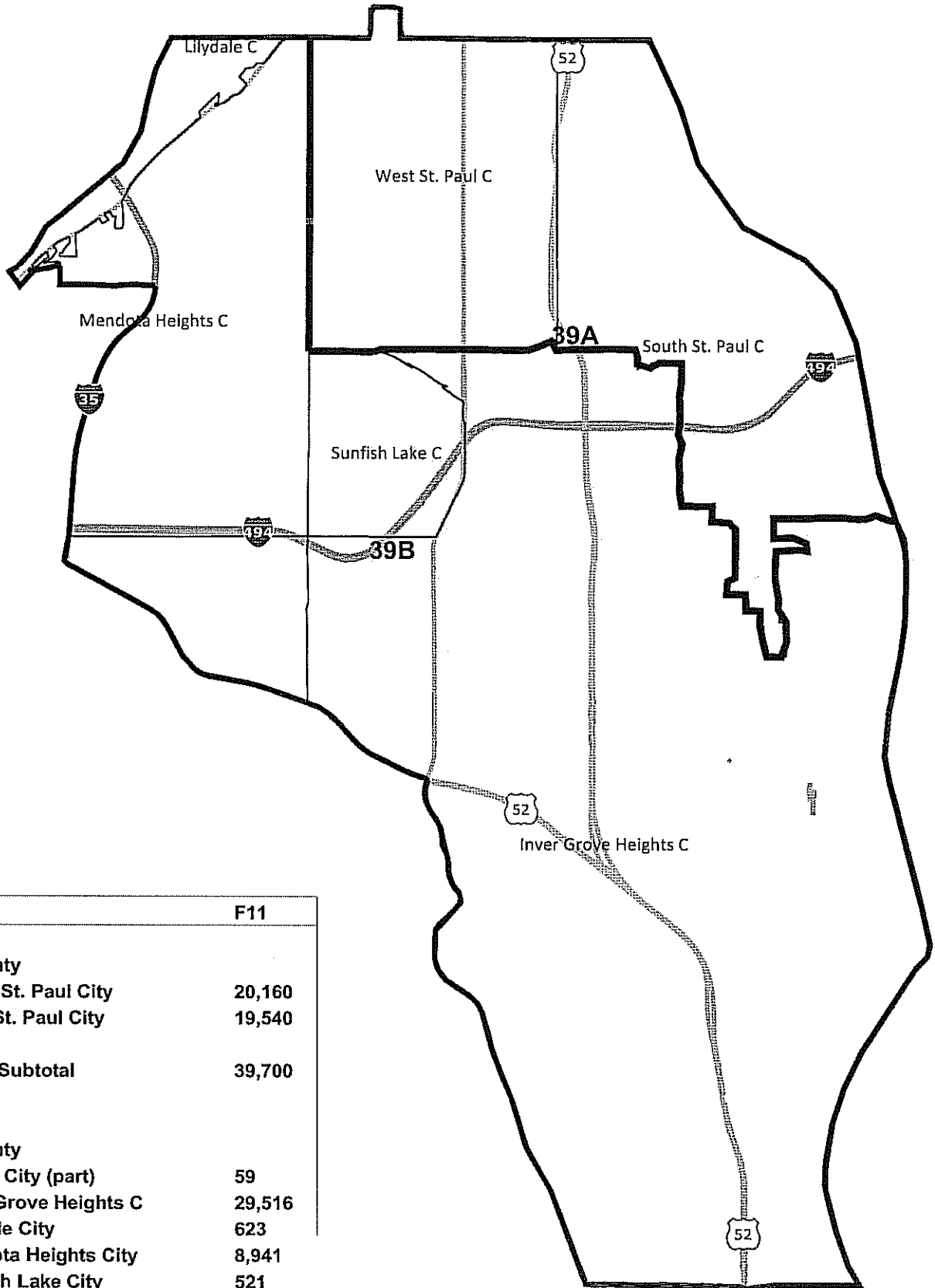
Britton et al State Legislative Plan District 38A and 38B



F2	F11
District 38A	
Washington County	
Cottage Grove City (part)	30,176
MCD: Grey Cloud Island Twn	289
MCD: Newport City	3,435
MCD: St. Paul Park City	5,279
MCD: Woodbury City (part)	457
District 38A Subtotal	39,636
District 38B	
Dakota County	
MCD: Hastings City	22,172
MCD: Nininger Township	950
Dakota County Subtotal	23,122
Washington County	
MCD: Afton City	2,886
MCD: Cottage Grove City (part)	4,413
MCD: Denmark Township	1,737
MCD: Hastings City (Part)	0
MCD: Lake St. Croix Beach	1,051
MCD: Lakeland City	1,796
MCD: Lakeland Shores City	311
MCD: St. Marys Point City	368
MCD: West Lakeland Twn	4,046
Washington County Subtotal	16,608
District 38B Subtotal	39,730

Britton et al State Legislative Plan

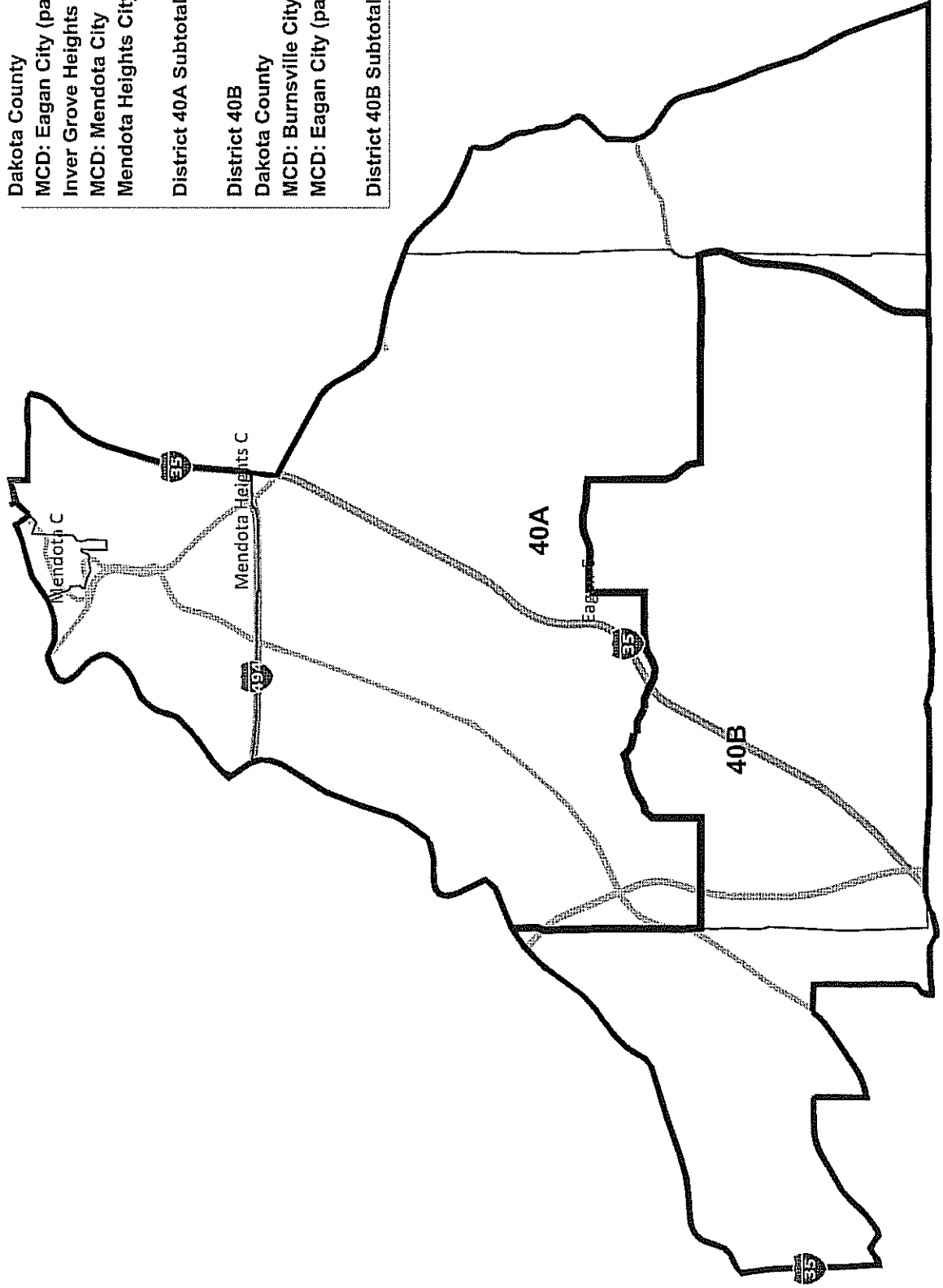
District 39A and 39B



F2	F11
District 39A	
Dakota County	
MCD: South St. Paul City	20,160
MCD: West St. Paul City	19,540
District 39A Subtotal	39,700
District 39B	
Dakota County	
MCD: Eagan City (part)	59
MCD: Inver Grove Heights C	29,516
MCD: Lilydale City	623
MCD: Mendota Heights City	8,941
MCD: Sunfish Lake City	521
District 39B Subtotal	39,660

Britton et al State Legislative Plan

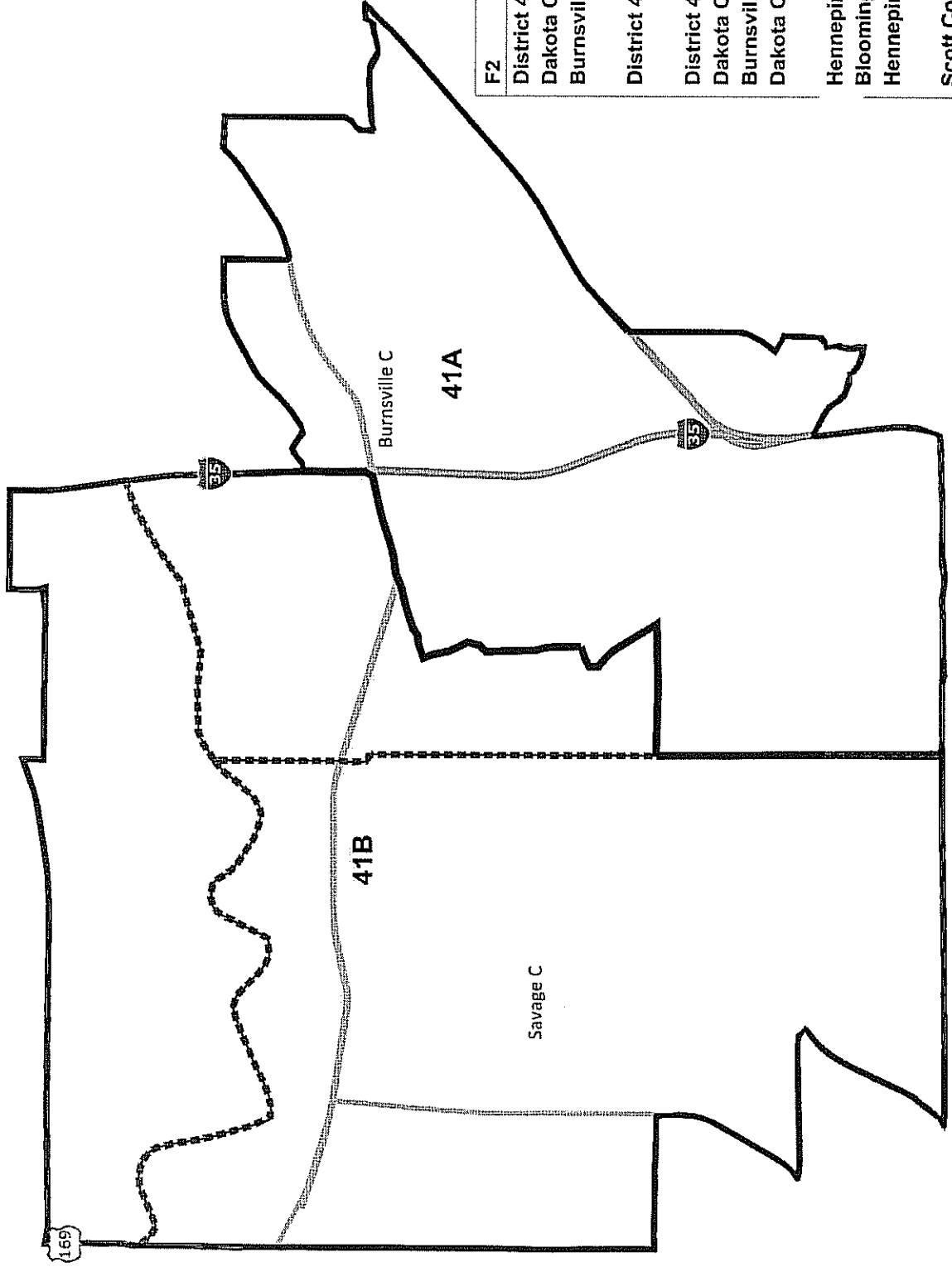
District 40A and 40B



F2	F11
District 40A	
Dakota County	
MCD: Eagan City (part)	33,013
Inver Grove Heights (part)	4,364
MCD: Mendota City	198
Mendota Heights City (part)	2,130
District 40A Subtotal	39,705
District 40B	
Dakota County	
MCD: Burnsville City (part)	8,588
MCD: Eagan City (part)	31,134
District 40B Subtotal	39,722

Britton et al State Legislative Plan

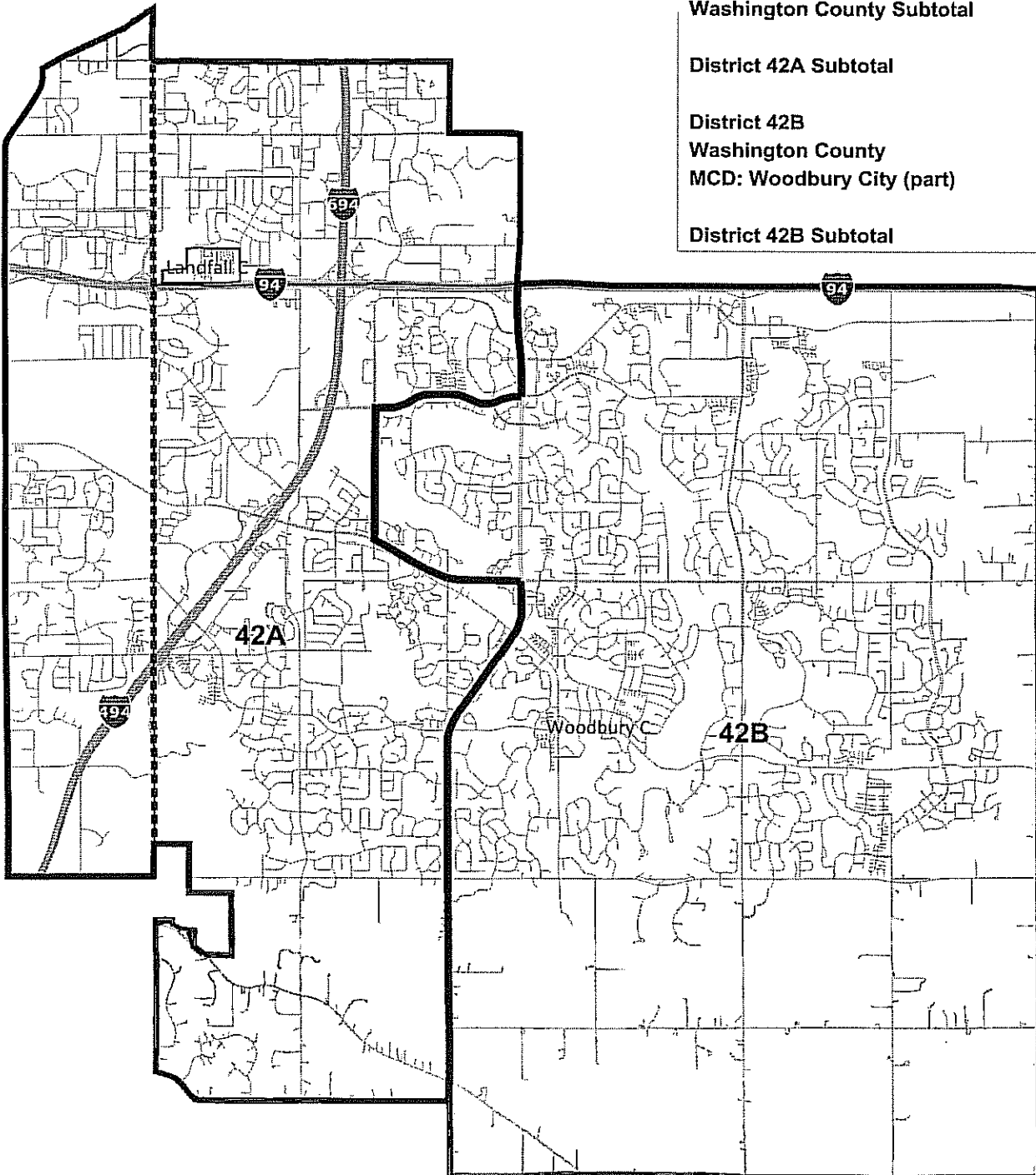
District 41A and 41B



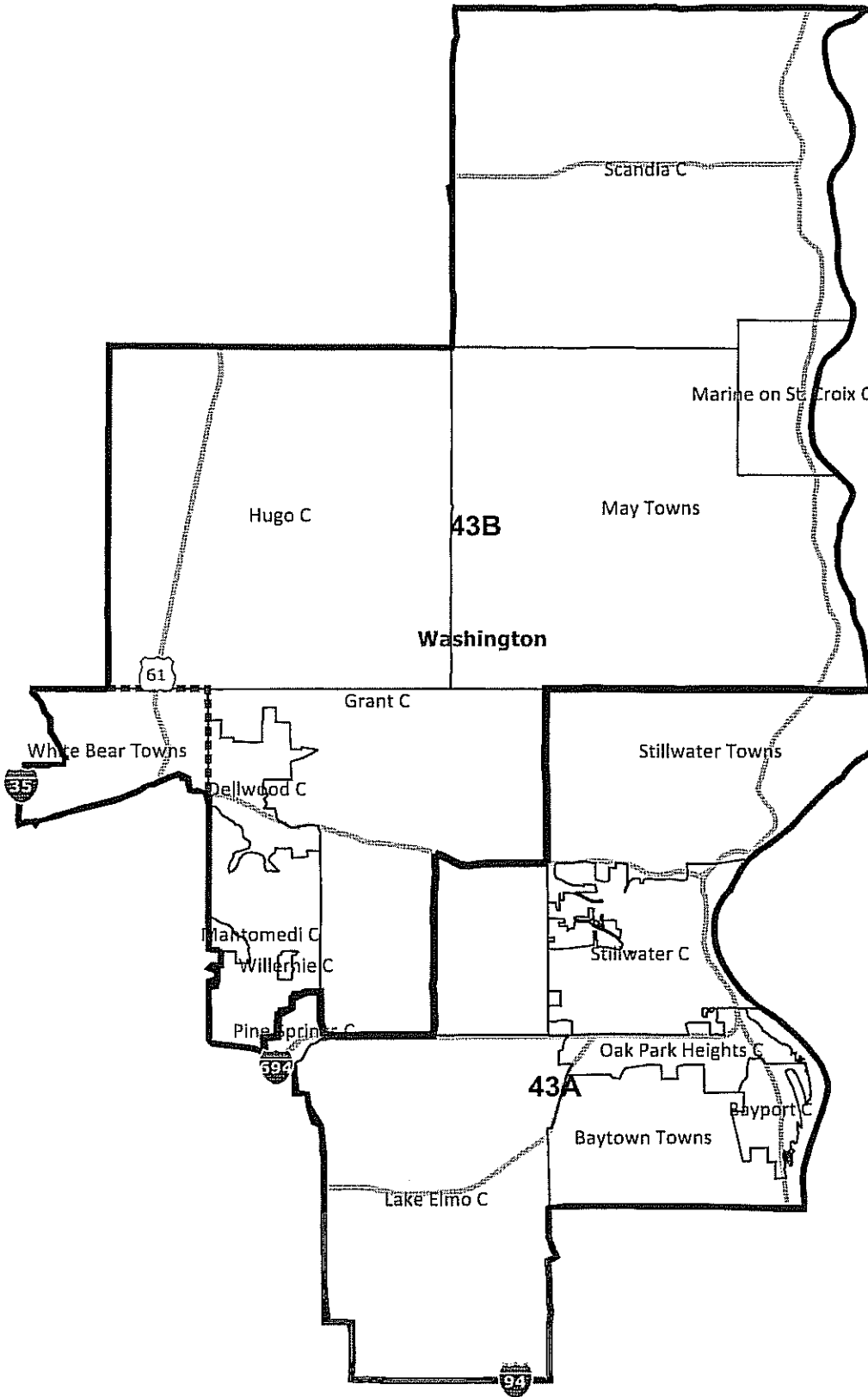
F2	F11
District 41A	
Dakota County	
Burnsville City (part)	39,687
District 41A Subtotal	39,687
District 41B	
Dakota County	
Burnsville City (part)	3,911
Dakota County Subtotal	3,911
Hennepin County	
Bloomington City (part)	9,484
Hennepin County Subtotal	9,484
Scott County	
Savage City (part)	26,204
Scott County Subtotal	26,204
District 41B Subtotal	39,599

Britton et al State Legislative Plan District 42A and 42B

F2	F11
District 42A	
Ramsey County	
MCD: Maplewood City (part)	9,038
Ramsey County Subtotal	9,038
Washington County	
MCD: Landfall City	686
MCD: Oakdale City (part)	7,824
MCD: Woodbury City (part)	21,988
Washington County Subtotal	30,498
District 42A Subtotal	39,536
District 42B	
Washington County	
MCD: Woodbury City (part)	39,516
District 42B Subtotal	39,516



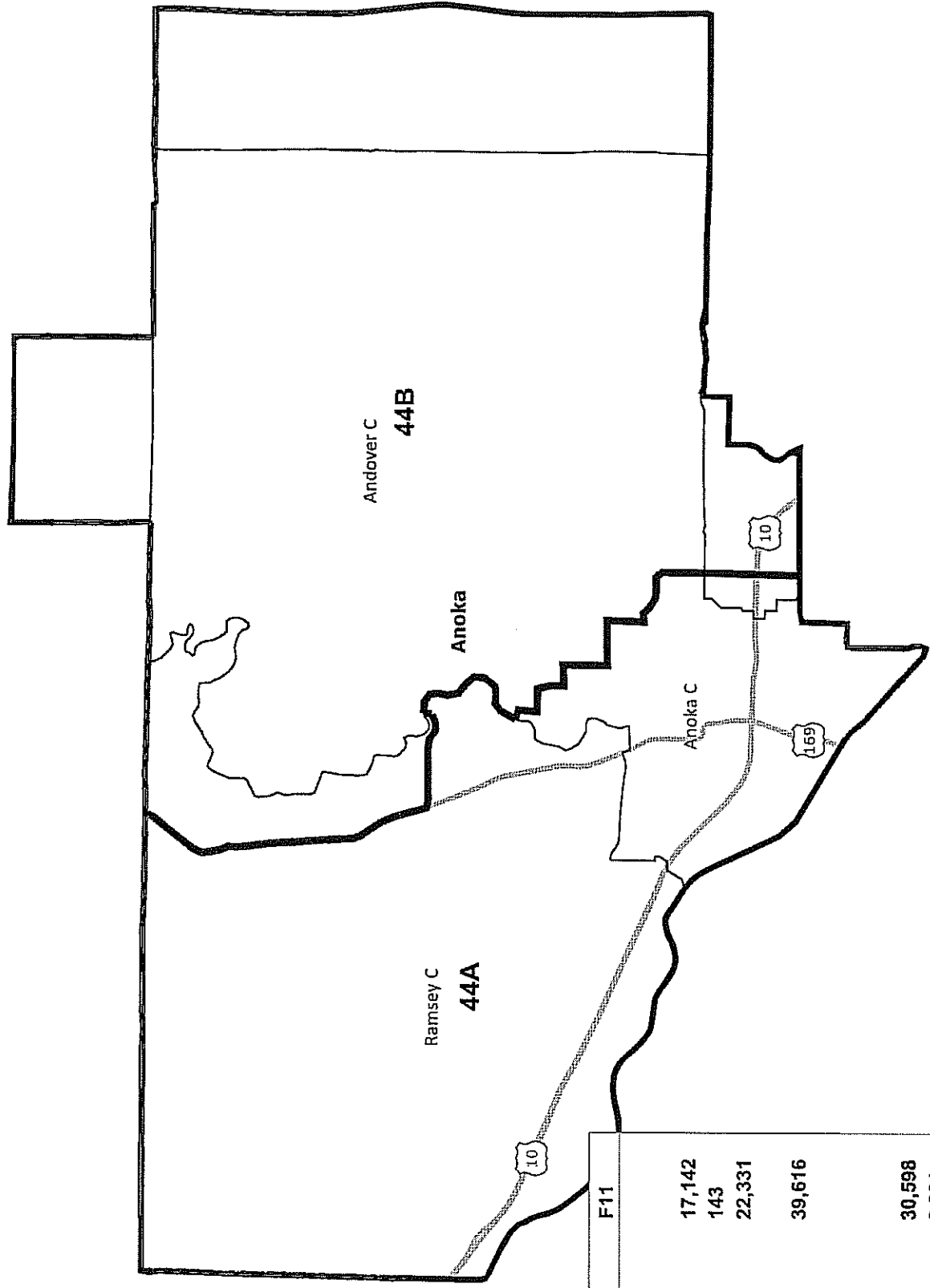
Britton et al State Legislative Plan District 43A and 43B



F2	F11
District 43A	
Washington County	
MCD: Bayport City	3,471
MCD: Baytown Township	1,723
MCD: Grant City (part)	915
MCD: Lake Elmo City	8,069
MCD: Oak Park Heights City	4,339
MCD: Pine Springs City	408
MCD: Stillwater City	18,225
MCD: Stillwater Township	2,366
District 43A Subtotal	39,516
District 43B	
Ramsey County	
White Bear Lake City part	0
White Bear Township (part)	5,503
Ramsey County Subtotal	5,503
Washington County	
Birchwood Village City pt.	870
MCD: Dellwood City	1,063
MCD: Grant City (part)	3,181
MCD: Hugo City	13,332
MCD: Mahtomedi City	7,676
Marine on St. Croix City	689
MCD: May Township	2,776
MCD: Scandia City	3,936
MCD: Willernie City	507
Washington County Subtotal	34,030
District 43B Subtotal	39,533

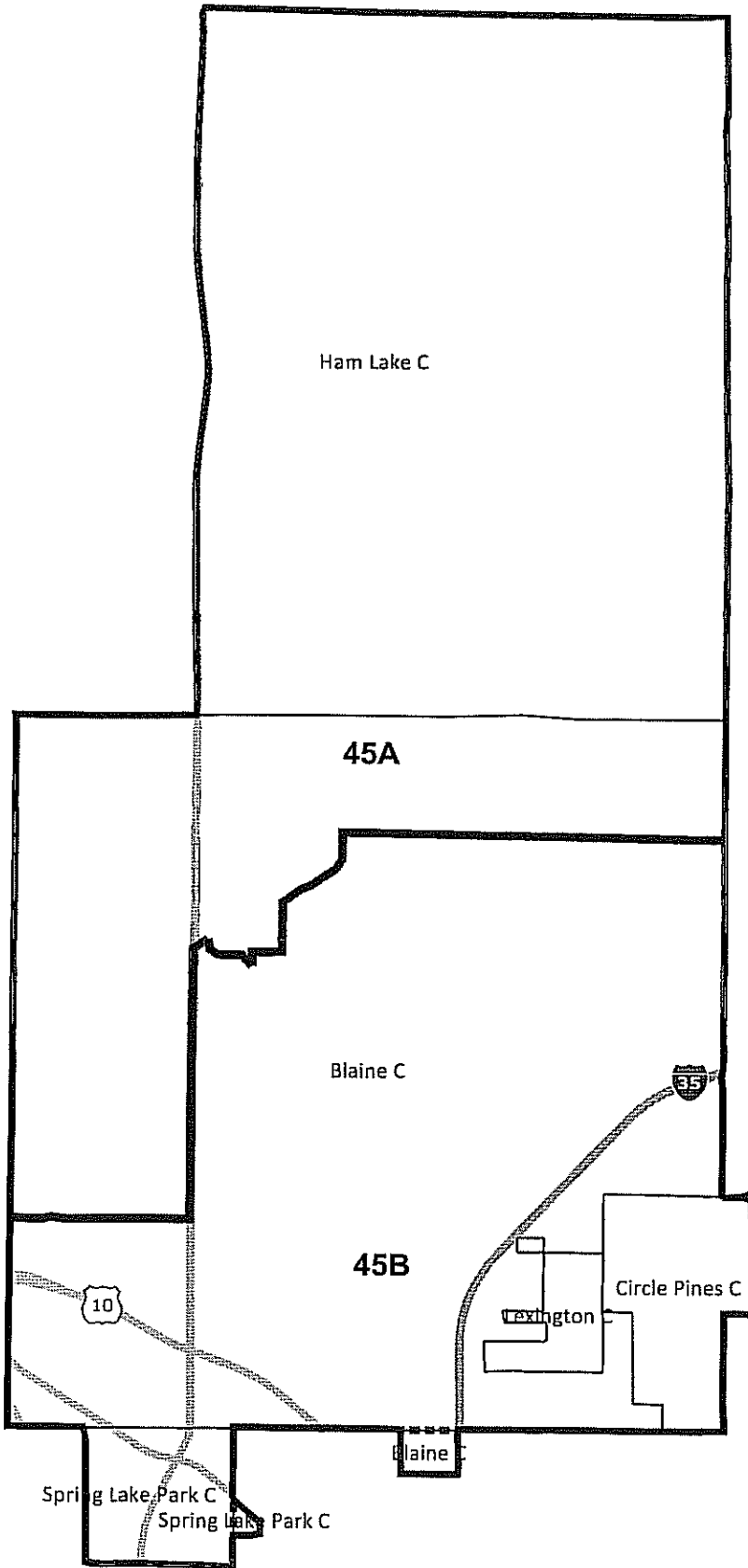
Britton et al State Legislative Plan

District 44A and 44B



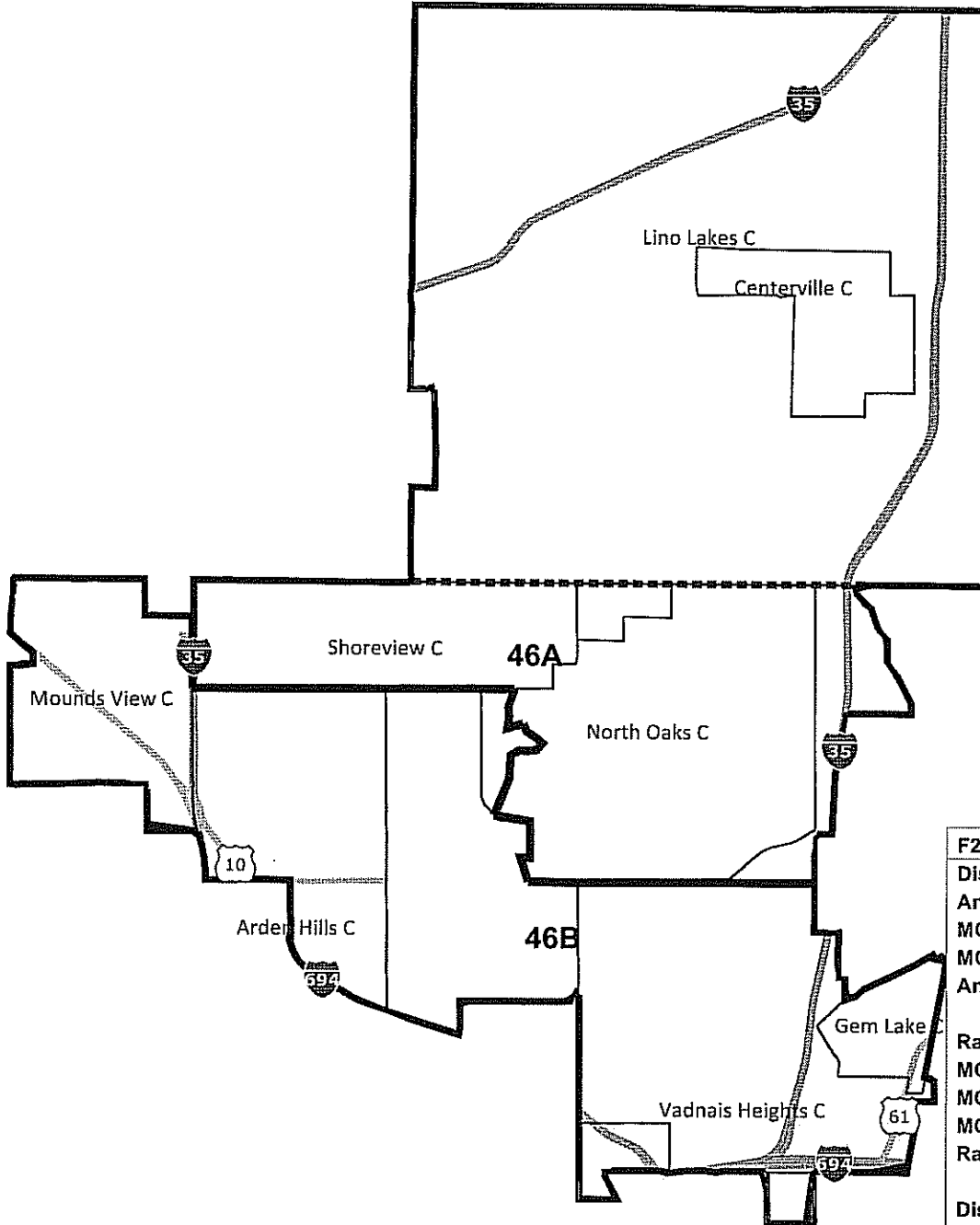
F2	F11
District 44A	
Anoka County	17,142
MCD: Anoka City	143
Coon Rapids City (part)	22,331
MCD: Ramsey City (part)	
District 44A Subtotal	39,616
District 44B	
Anoka County	30,598
MCD: Andover City	2,991
Coon Rapids City (part)	4,232
MCD: Ham Lake City (part)	533
MCD: Oak Grove City (part)	1,337
MCD: Ramsey City (part)	
District 44B Subtotal	39,691

Britton et al State Legislative Plan District 45A and 45B



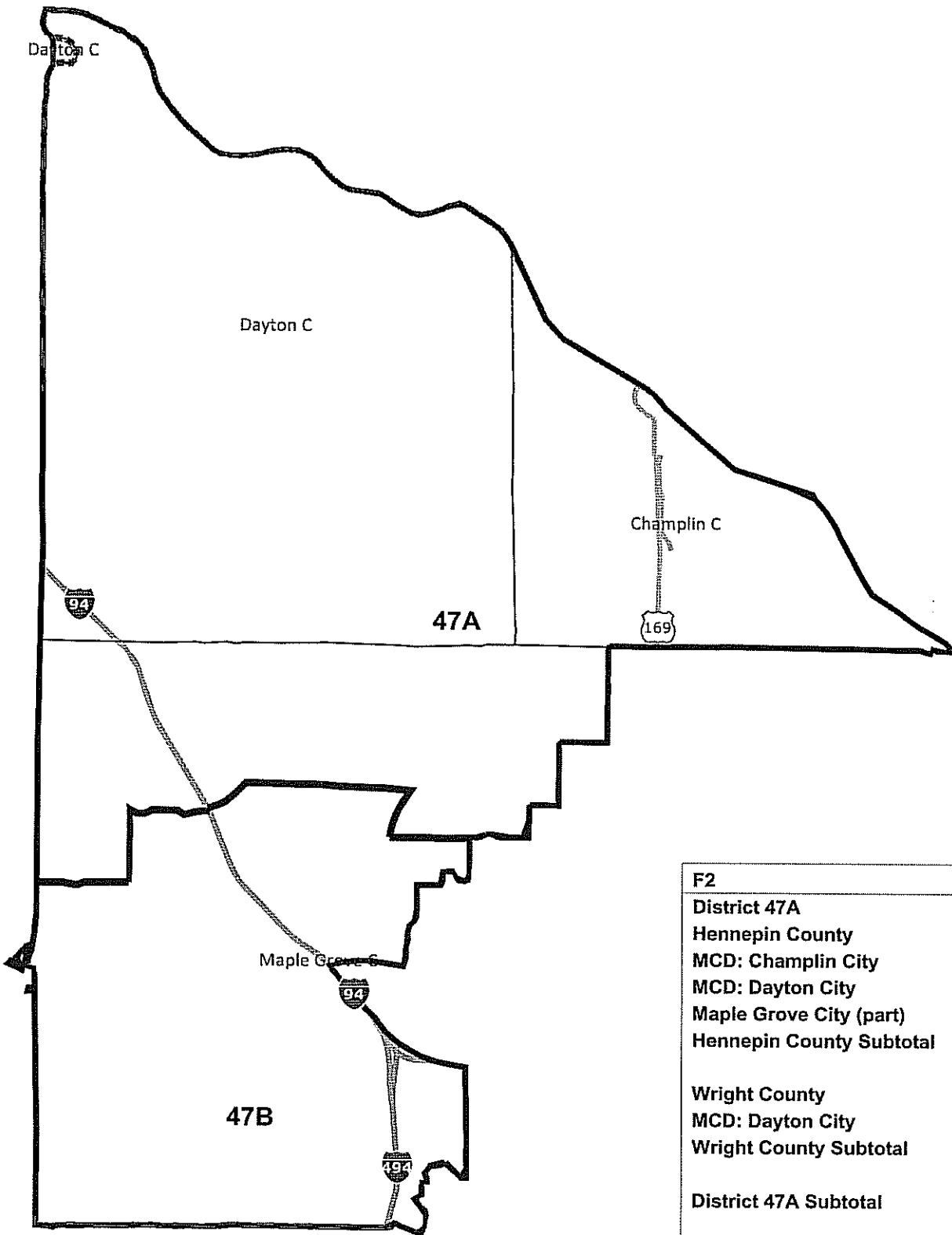
F2	F11
District 45A	
Anoka County	
MCD: Blaine City (part)	28,577
MCD: Ham Lake City (part)	11,064
District 45A Subtotal	39,641
District 45B	
Anoka County	
MCD: Blaine City (part)	28,609
MCD: Circle Pines City	4,918
MCD: Lexington City	2,049
MCD: Spring Lake Park City	3,678
Anoka County Subtotal	39,254
Ramsay County	
MCD: Blaine City	0
MCD: Spring Lake Park City	178
Ramsay County Subtotal	178
District 45B Subtotal	39,432

Britton et al State Legislative Plan District 46A and 46B



F2	F11
District 46A	
Anoka County	
MCD: Centerville City	3,792
MCD: Lino Lakes City	20,216
Anoka County Subtotal	24,008
Ramsey County	
MCD: North Oaks City (part)	4,225
MCD: Shoreview City (part)	8,833
MCD: White Bear Twn (part)	2,421
Ramsey County Subtotal	15,479
District 46A Subtotal	39,487
District 46B	
Ramsey County	
Arden Hills City (part)	2,830
MCD: Gem Lake City	393
Little Canada City (part)	861
MCD: Mounds View City	12,155
North Oaks City (part)	244
MCD: Shoreview City (part)	10,800
MCD: Vadnais Heights City	12,302
District 46B Subtotal	39,585

Britton et al State Legislative Plan District 47A and 47B

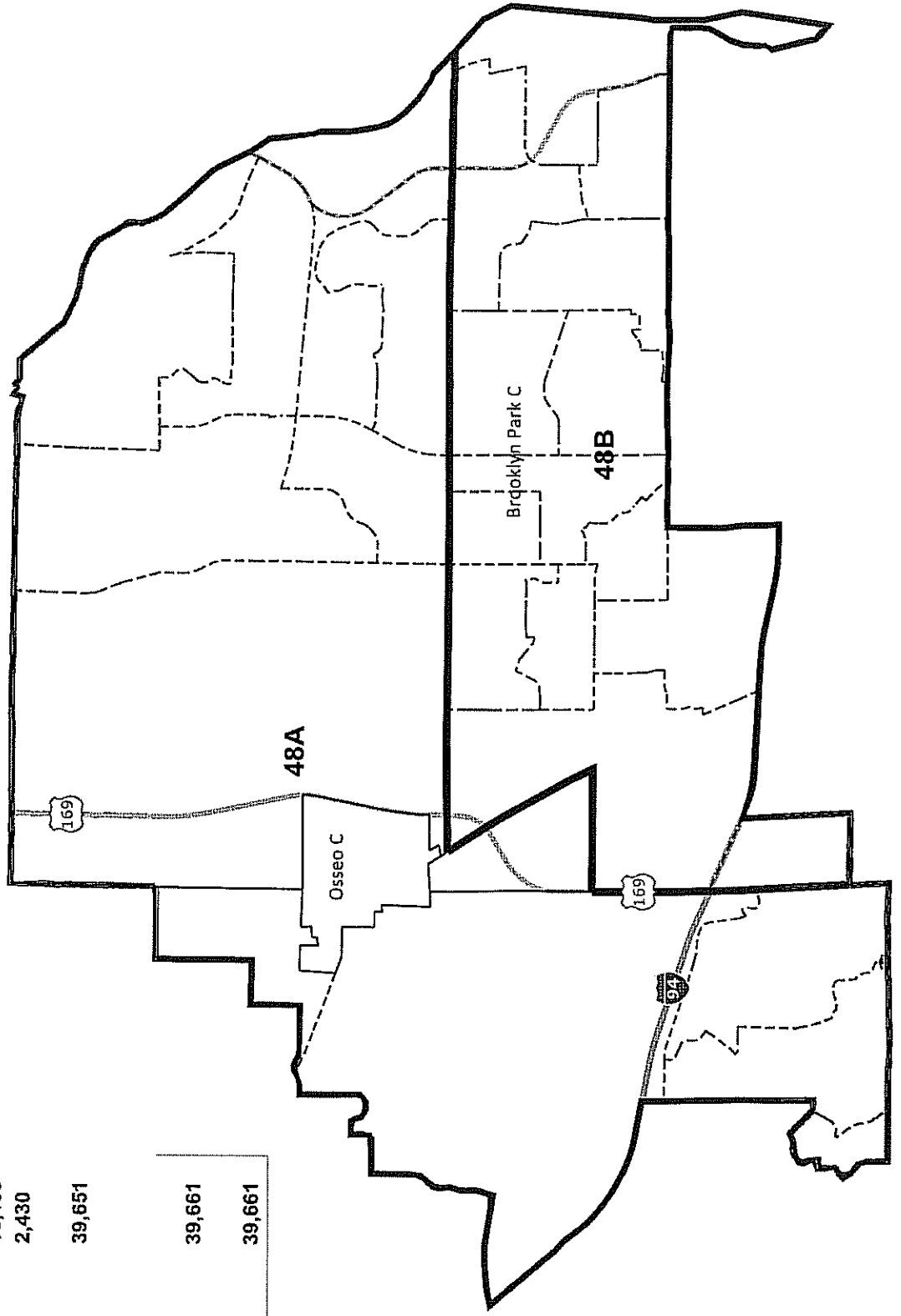


F2	F11
District 47A	
Hennepin County	
MCD: Champlin City	23,089
MCD: Dayton City	4,617
Maple Grove City (part)	11,745
Hennepin County Subtotal	39,451
Wright County	
MCD: Dayton City	54
Wright County Subtotal	54
District 47A Subtotal	39,505
District 47B	
Hennepin County	
Maple Grove City (part)	39,683
District 47B Subtotal	39,683

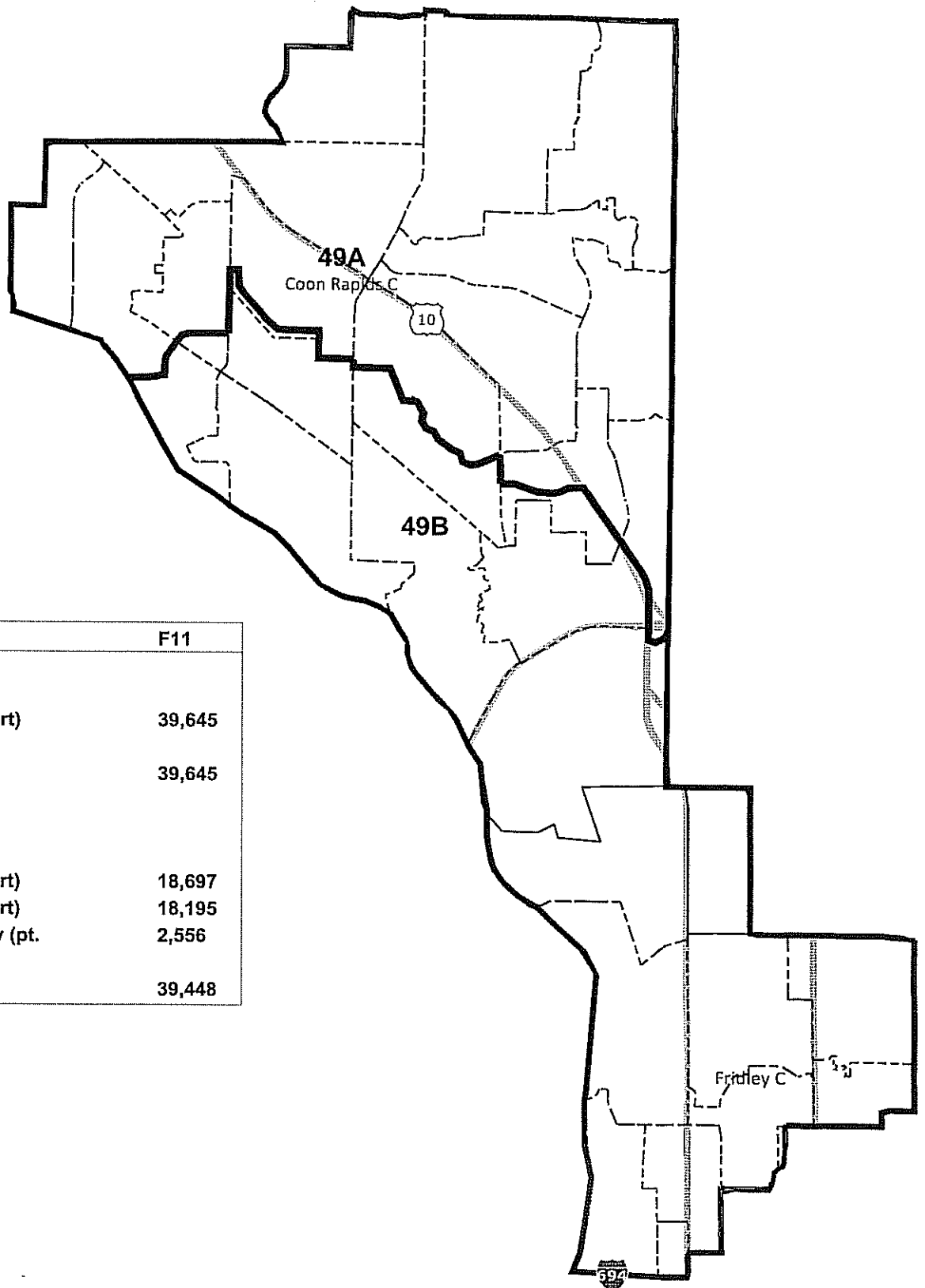
Britton et al State Legislative Plan

District 48A and 48B

F2	F11
District 48A	
Hennepin County	27,082
Brooklyn Park City (part)	10,139
Maple Grove City (part)	2,430
MCD: Osseo City	
District 48A Subtotal	39,651
District 48B	
Hennepin County	39,661
Brooklyn Park City (part)	
District 48B Subtotal	39,661

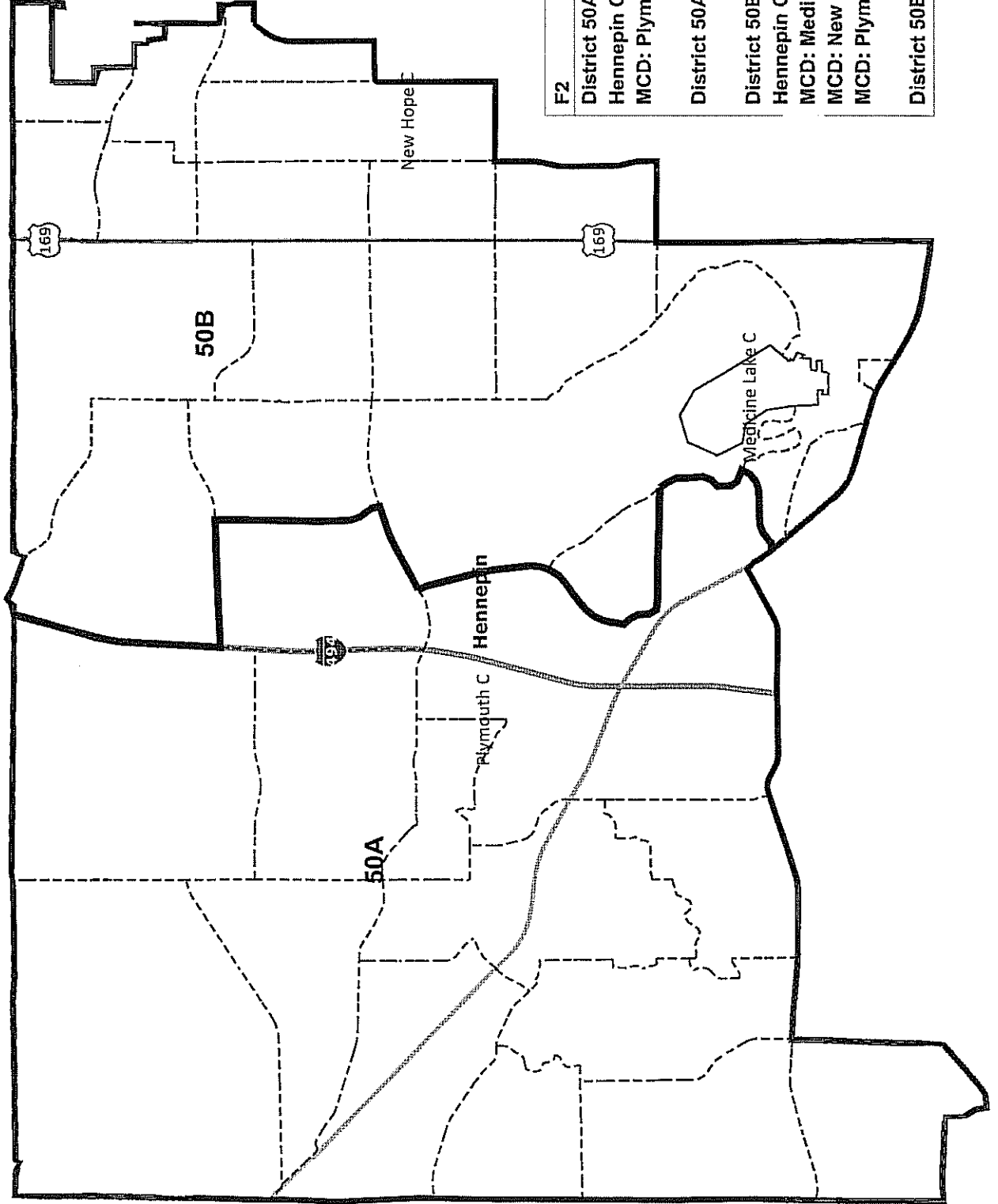


Britton et al State Legislative Plan District 49A and 49B



F2	F11
District 49A	
Anoka County	
Coon Rapids City (part)	39,645
District 49A Subtotal	39,645
District 49B	
Anoka County	
Coon Rapids City (part)	18,697
MCD: Fridley City (part)	18,195
Spring Lake Park City (pt.)	2,556
District 49B Subtotal	39,448

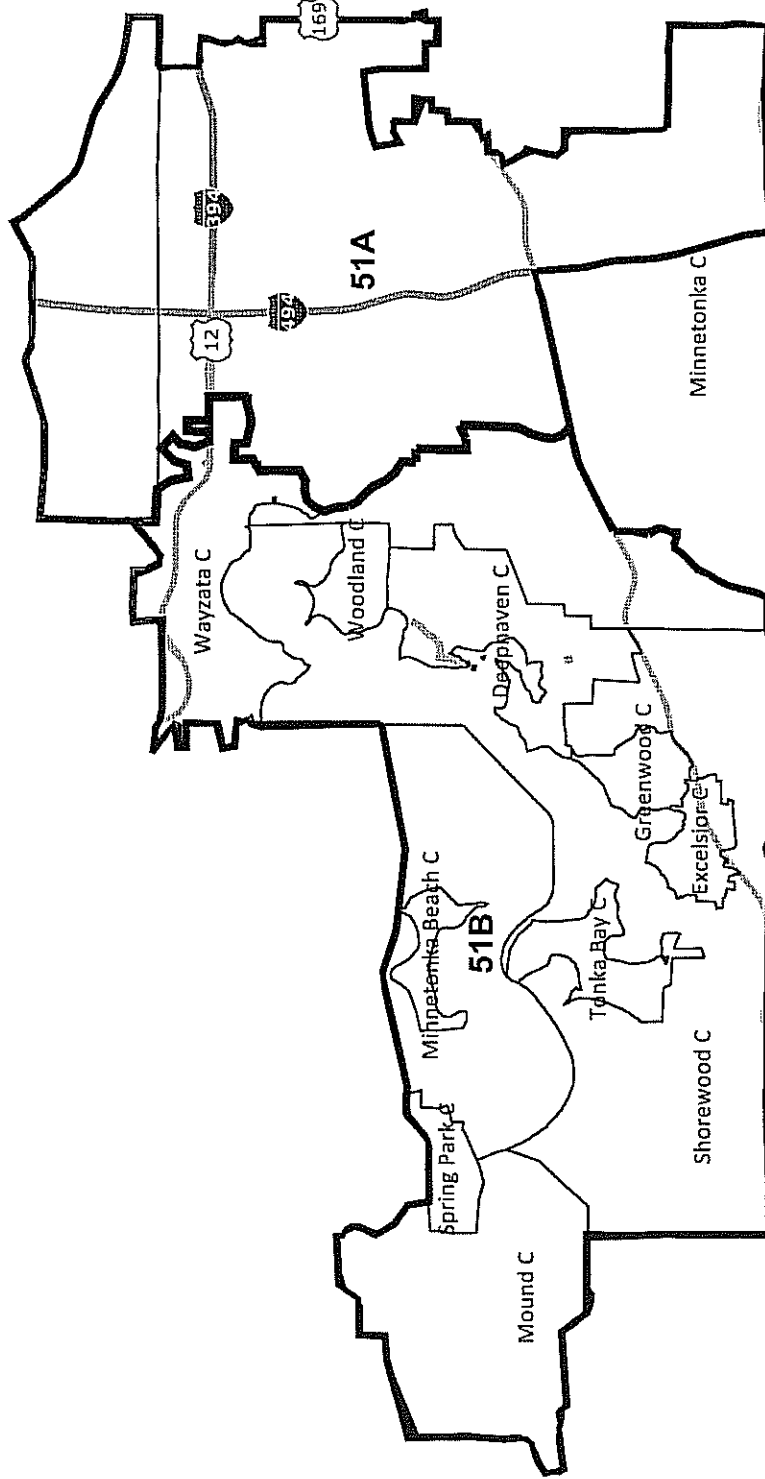
Britton et al State Legislative Plan District 50A and 50B



F2	F11
District 50A	
Hennepin County	
MCD: Plymouth City (part)	39,438
District 50A Subtotal	39,438
District 50B	
Hennepin County	
MCD: Medicine Lake City	371
MCD: New Hope City (part)	16,263
MCD: Plymouth City (part)	22,888
District 50B Subtotal	39,522

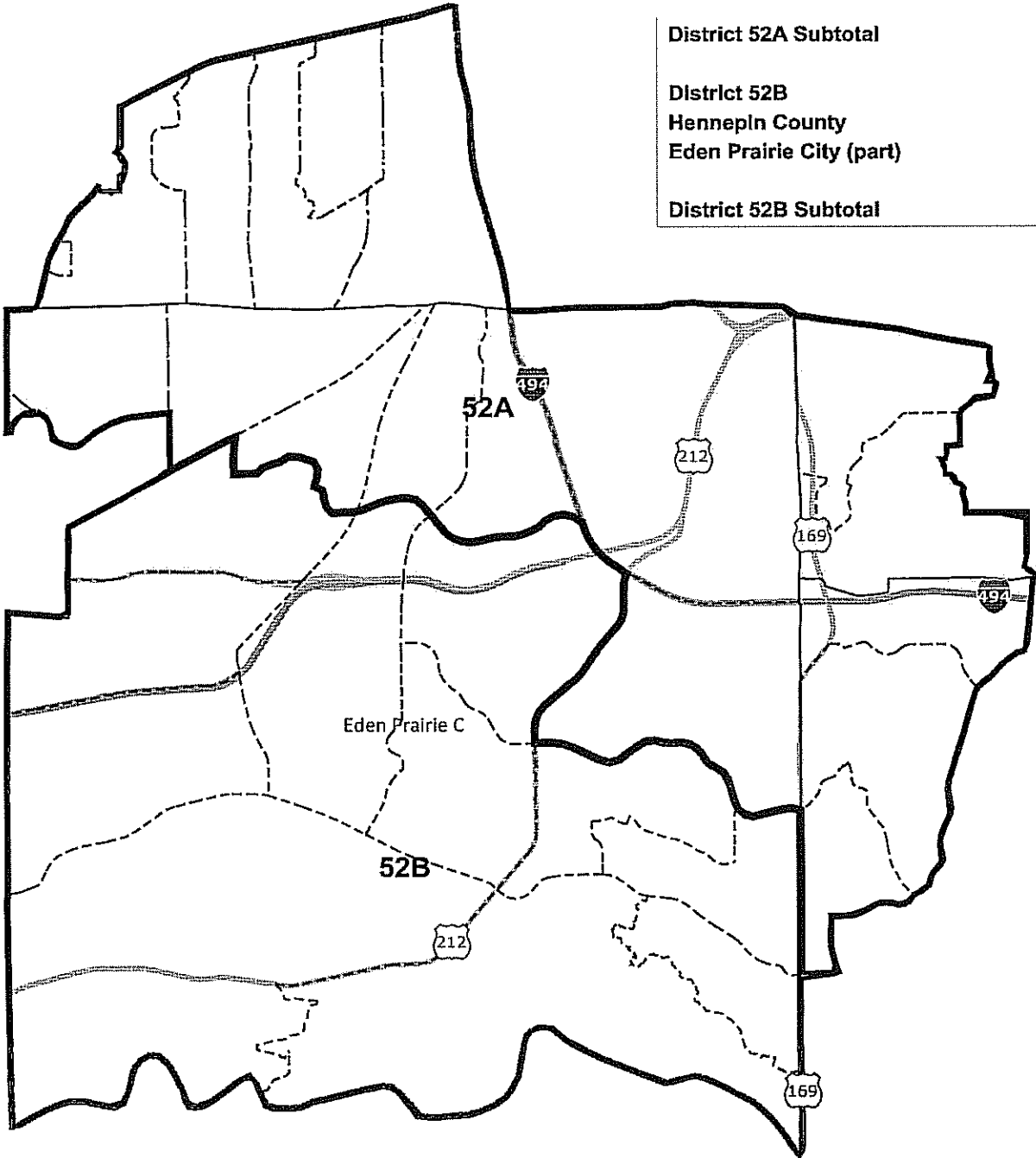
Britton et al State Legislative Plan District 51A and 51B

F2	F11
District 51A	
Hennepin County	31,188
Minnetonka City (part)	8,250
MCD: Plymouth City (part)	
District 51A Subtotal	39,438
District 51B	
Hennepin County	
MCD: Deephaven City	3,642
MCD: Excelsior City	2,188
MCD: Greenwood City	688
MCD: Minnetonka Beach City	539
Minnetonka City (part)	7,463
MCD: Mound City	9,052
MCD: Orono City (part)	1,316
MCD: Shorewood City	7,307
MCD: Spring Park City	1,669
MCD: Tonka Bay City	1,475
MCD: Wayzata City	3,688
MCD: Woodland City	437
District 51B Subtotal	39,464



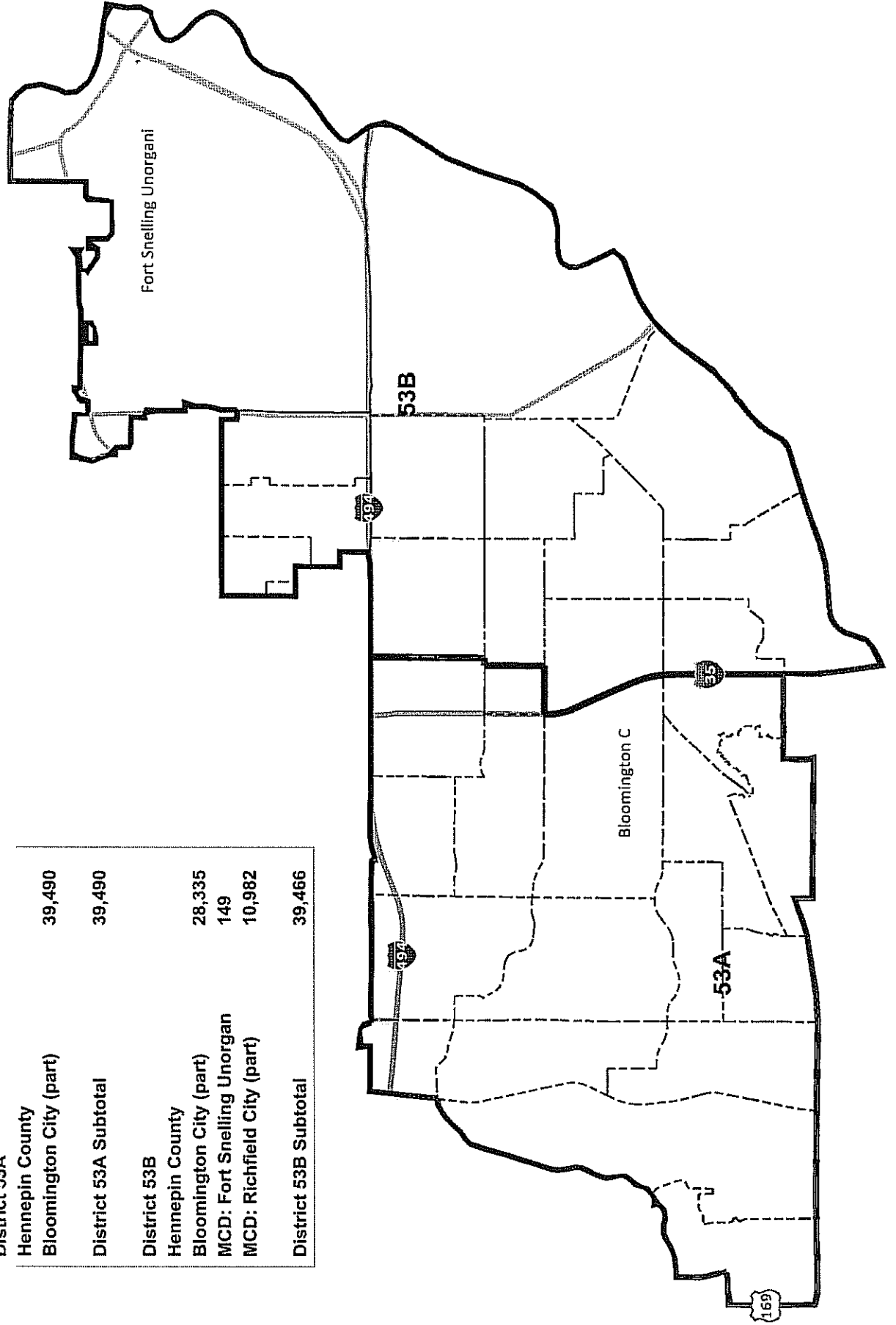
Britton et al State Legislative Plan District 52A and 52B

F2	F11
District 52A	
Hennepin County	
Bloomington City (part)	5,584
Eden Prairie City (part)	18,366
MCD: Edina City (part)	4,398
Minnetonka City (part)	11,083
District 52A Subtotal	39,431
District 52B	
Hennepin County	
Eden Prairie City (part)	39,474
District 52B Subtotal	39,474

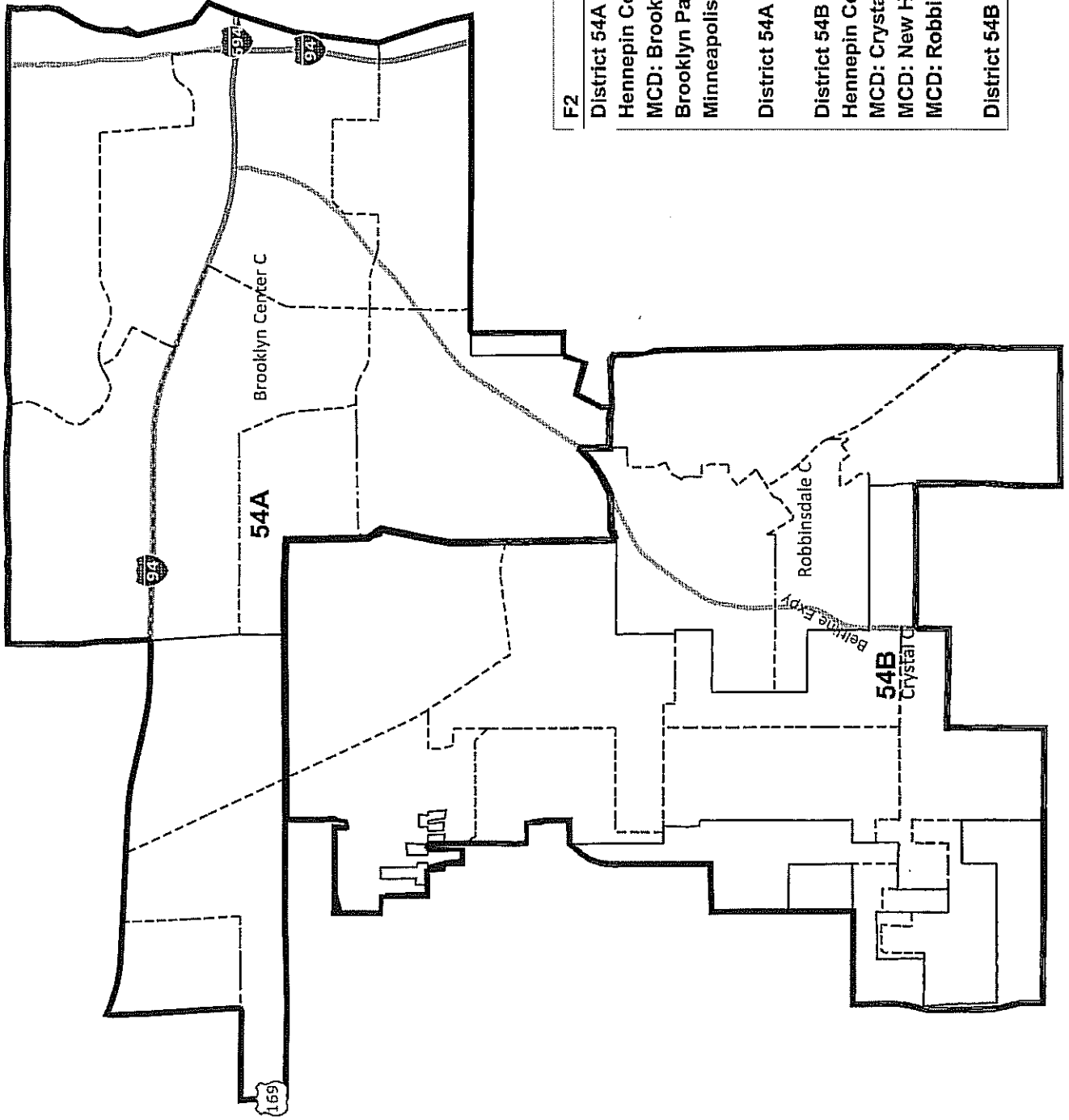


Britton et al State Legislative Plan District 53A and 53B

F2	F11
District 53A	
Hennepin County	39,490
Bloomington City (part)	39,490
District 53A Subtotal	39,490
District 53B	
Hennepin County	28,335
Bloomington City (part)	149
MCD: Fort Snelling Unorgan	10,982
MCD: Richfield City (part)	10,982
District 53B Subtotal	39,466

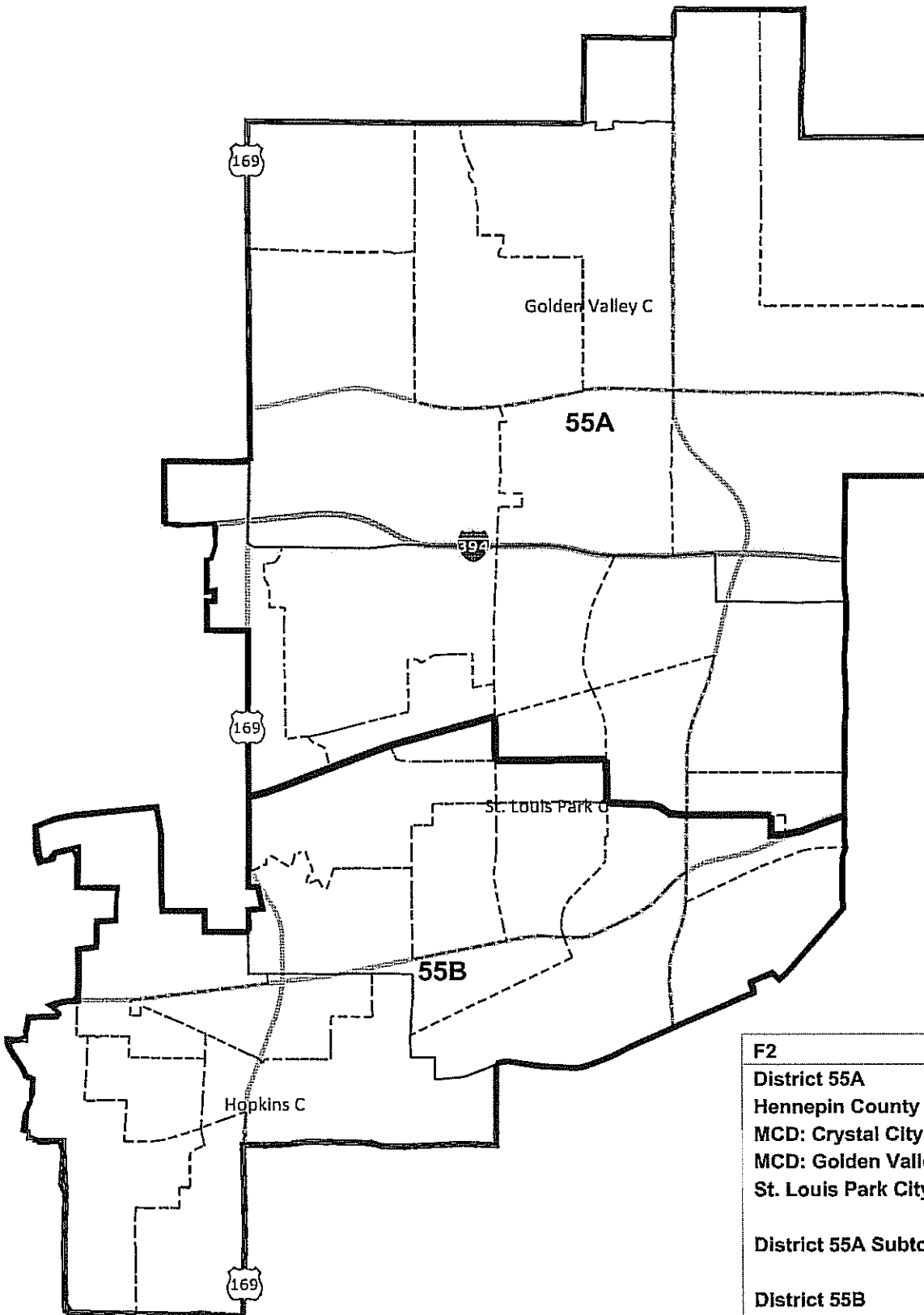


Britton et al State Legislative Plan District 54A and 54B



F2	F11
District 54A	
Hennepin County	
MCD: Brooklyn Center City	30,104
Brooklyn Park City (part)	9,038
Minneapolis City (part)	505
District 54A Subtotal	39,647
District 54B	
Hennepin County	
MCD: Crystal City (part)	21,517
MCD: New Hope City (part)	4,076
MCD: Robbinsdale City	13,953
District 54B Subtotal	39,546

Britton et al State Legislative Plan District 55A and 55B

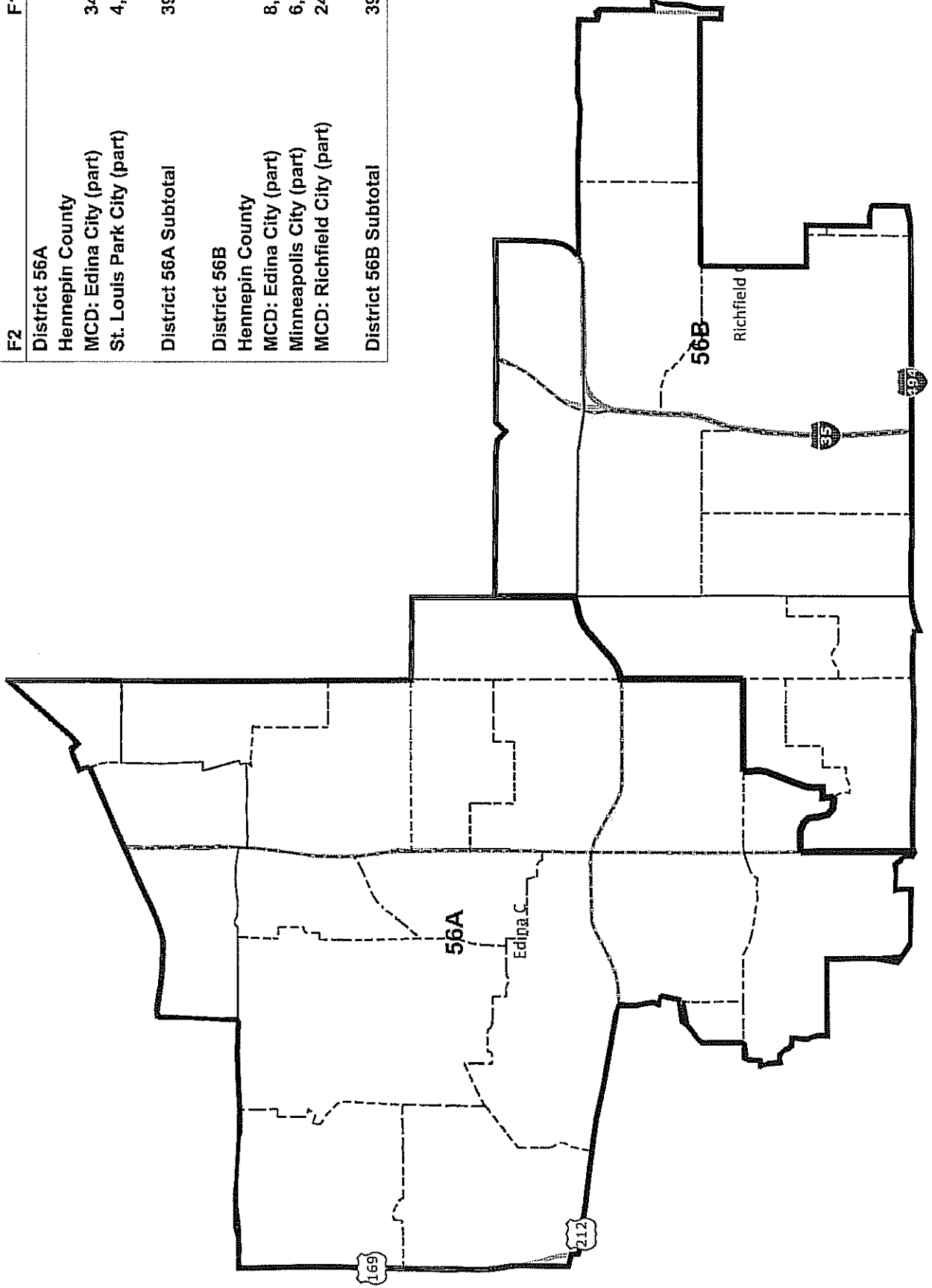


F2	F11
District 55A	
Hennepin County	
MCD: Crystal City (part)	634
MCD: Golden Valley City	20,371
St. Louis Park City (part)	18,478
District 55A Subtotal	39,483
District 55B	
Hennepin County	
MCD: Hopkins City	17,591
St. Louis Park City (part)	21,867
District 55B Subtotal	39,458

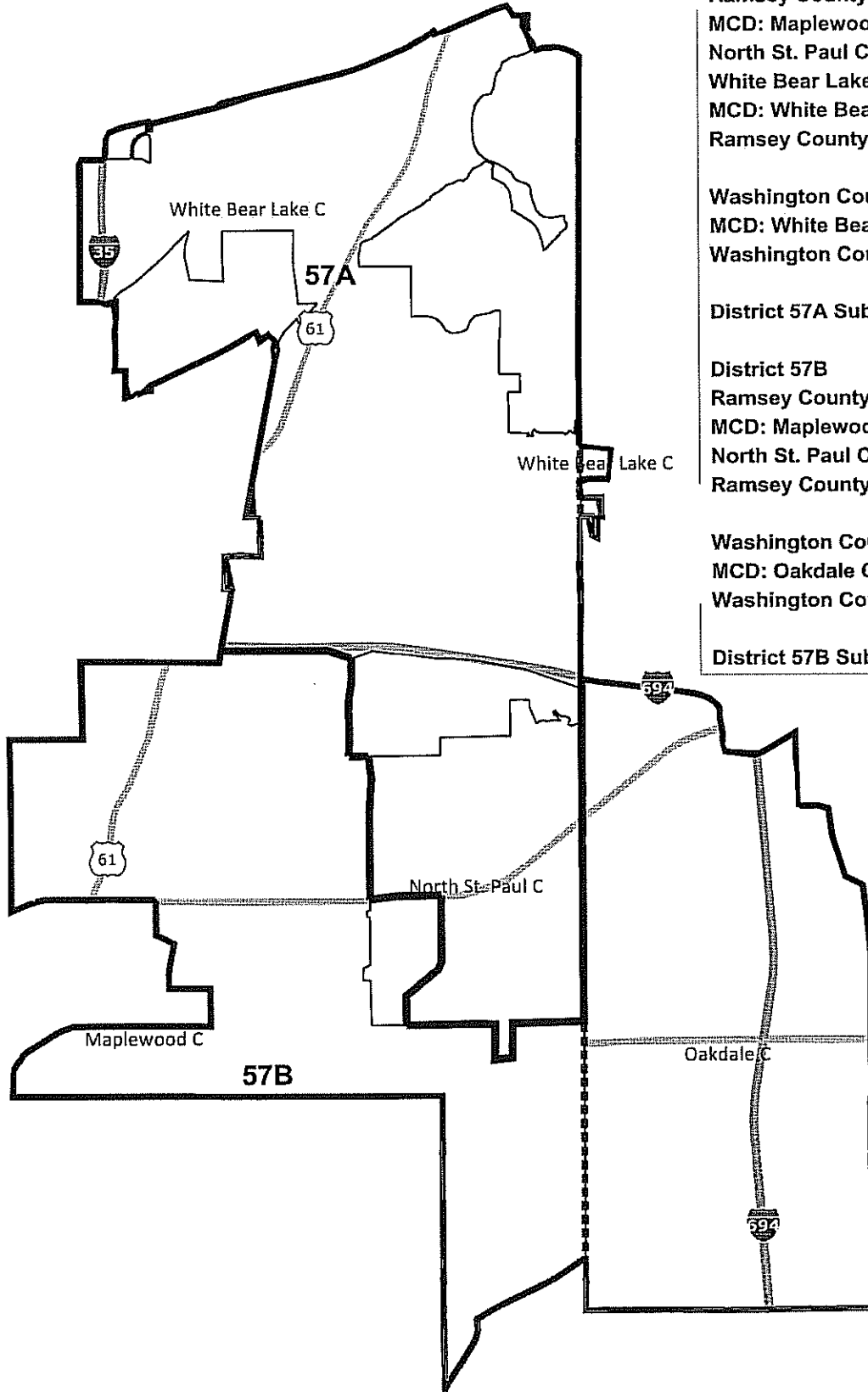
Britton et al State Legislative Plan

District 56A and 56B

F2	F11
District 56A	
Hennepin County	
MCD: Edina City (part)	34,554
St. Louis Park City (part)	4,905
District 56A Subtotal	39,459
District 56B	
Hennepin County	
MCD: Edina City (part)	8,989
Minneapolis City (part)	6,230
MCD: Richfield City (part)	24,246
District 56B Subtotal	39,465



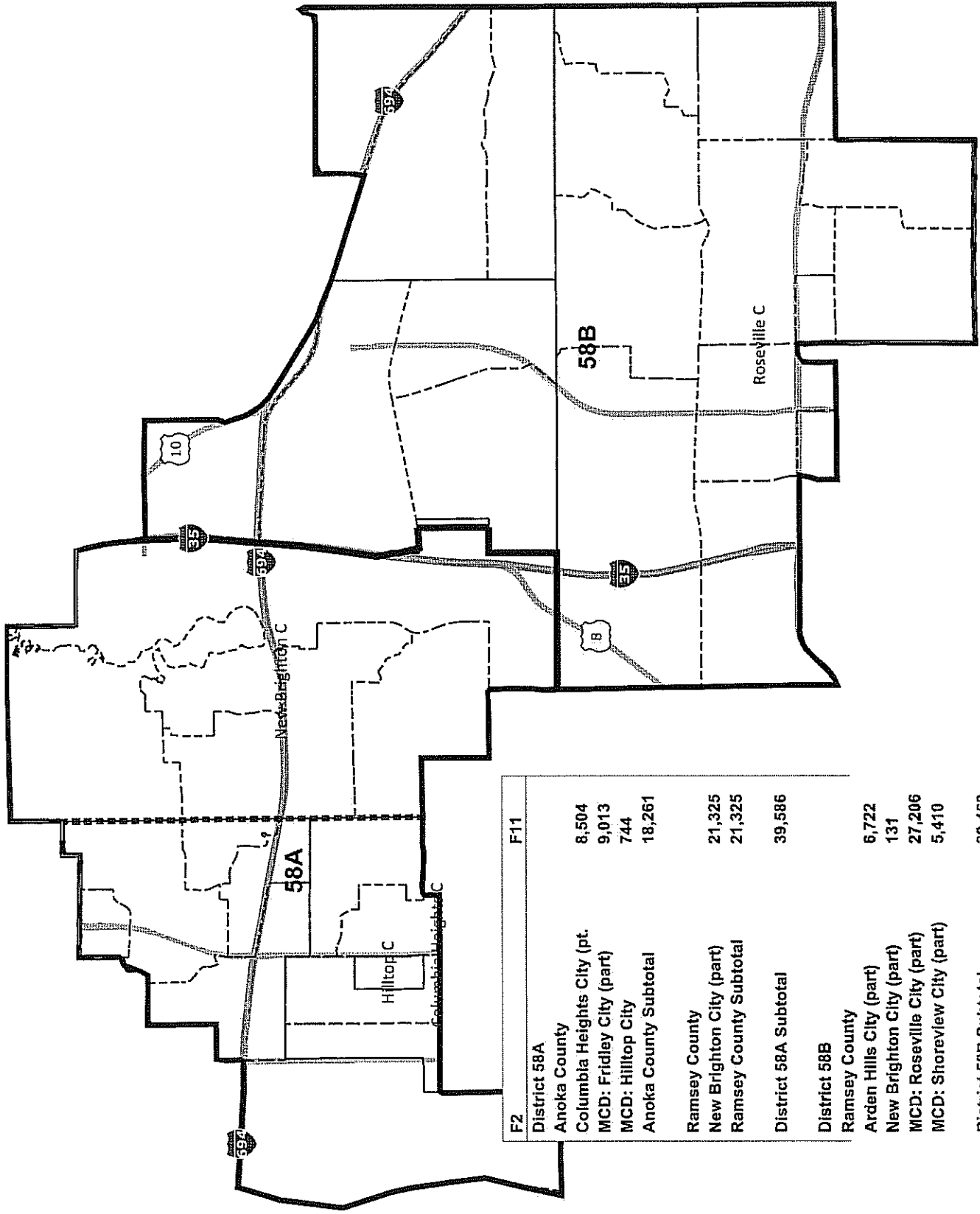
Britton et al State Legislative Plan District 57A and 57B



F2	F11
District 57A	
Ramsey County	
MCD: Maplewood City (part)	2,521
North St. Paul City (part)	10,093
White Bear Lake City (pt.)	23,394
MCD: White Bear Twn (part)	3,025
Ramsey County Subtotal	39,033
Washington County	
MCD: White Bear Lake City	403
Washington County Subtotal	403
District 57A Subtotal	39,436
District 57B	
Ramsey County	
MCD: Maplewood City (part)	18,534
North St. Paul City (part)	1,367
Ramsey County Subtotal	19,901
Washington County	
MCD: Oakdale City (part)	19,554
Washington County Subtotal	19,554
District 57B Subtotal	39,455

Britton et al State Legislative Plan

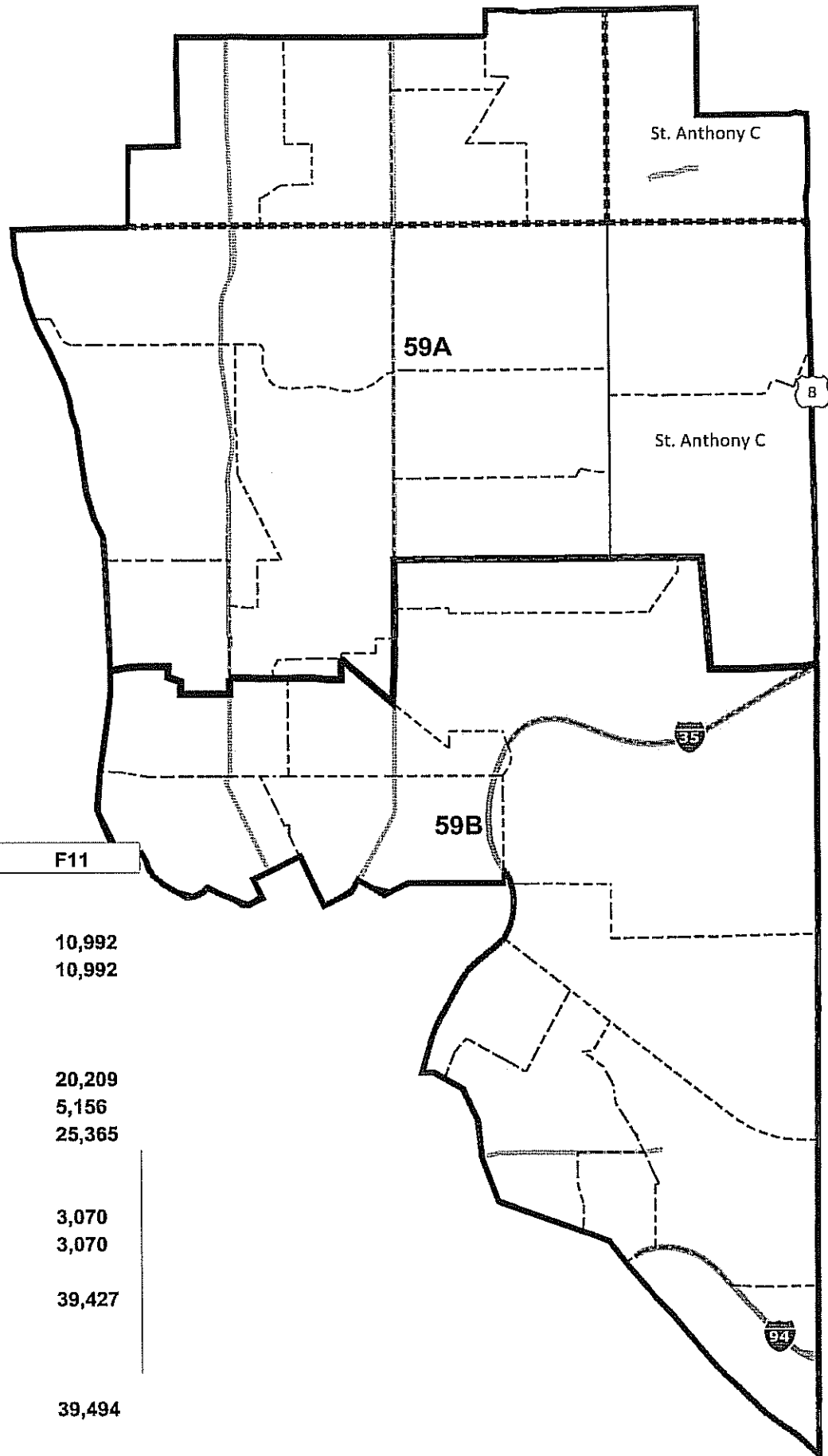
District 58A and 58B



F2	F11
District 58A	
Anoka County	8,504
Columbia Heights City (pt.)	9,013
MCD: Fridley City (part)	744
MCD: Hilltop City	18,261
Anoka County Subtotal	
Ramsey County	
New Brighton City (part)	21,325
Ramsey County Subtotal	21,325
District 58A Subtotal	39,586
District 58B	
Ramsey County	
Arden Hills City (part)	6,722
New Brighton City (part)	131
MCD: Roseville City (part)	27,206
MCD: Shoreview City (part)	5,410
District 58B Subtotal	39,469

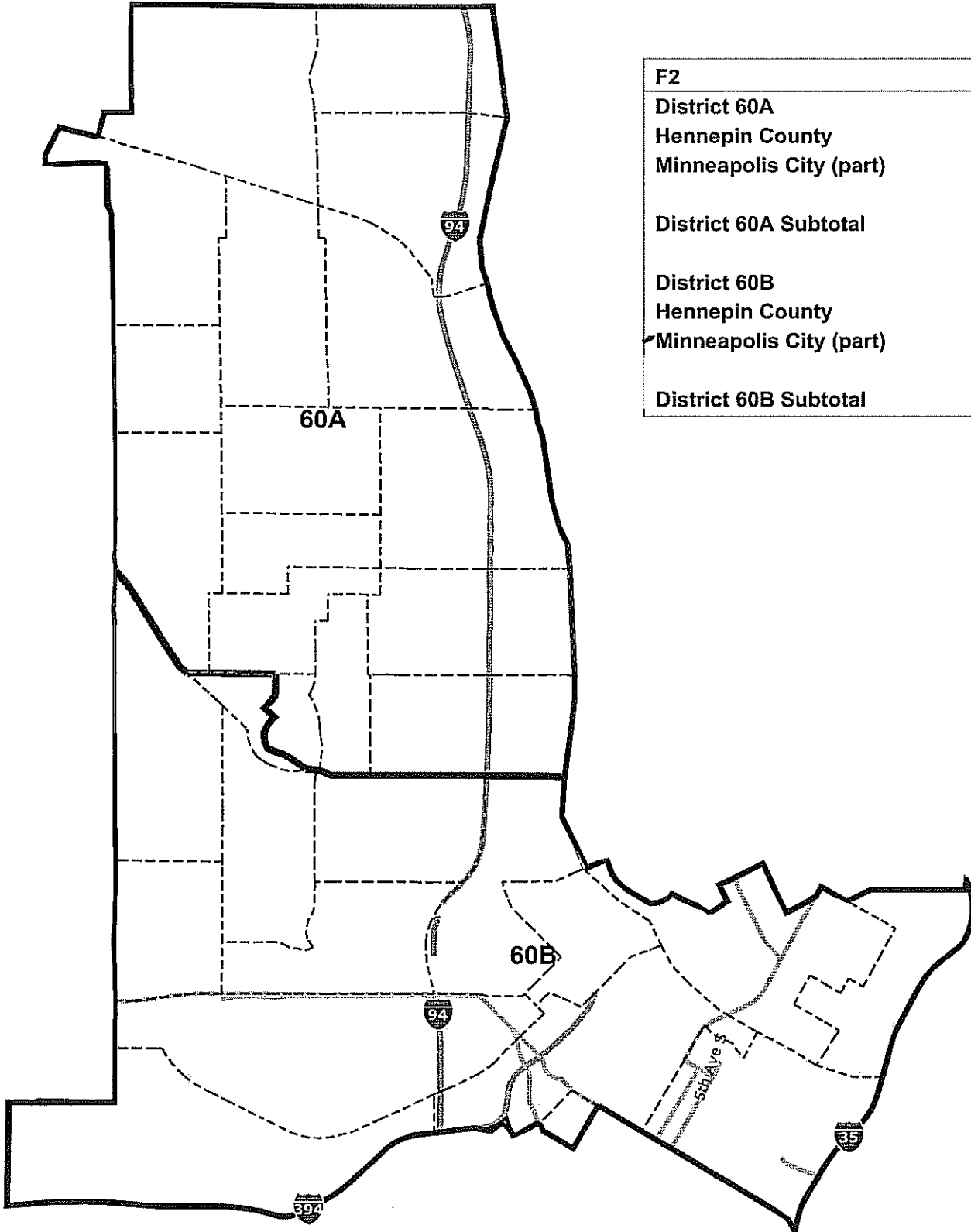
Britton et al State Legislative Plan

District 59A and 59B



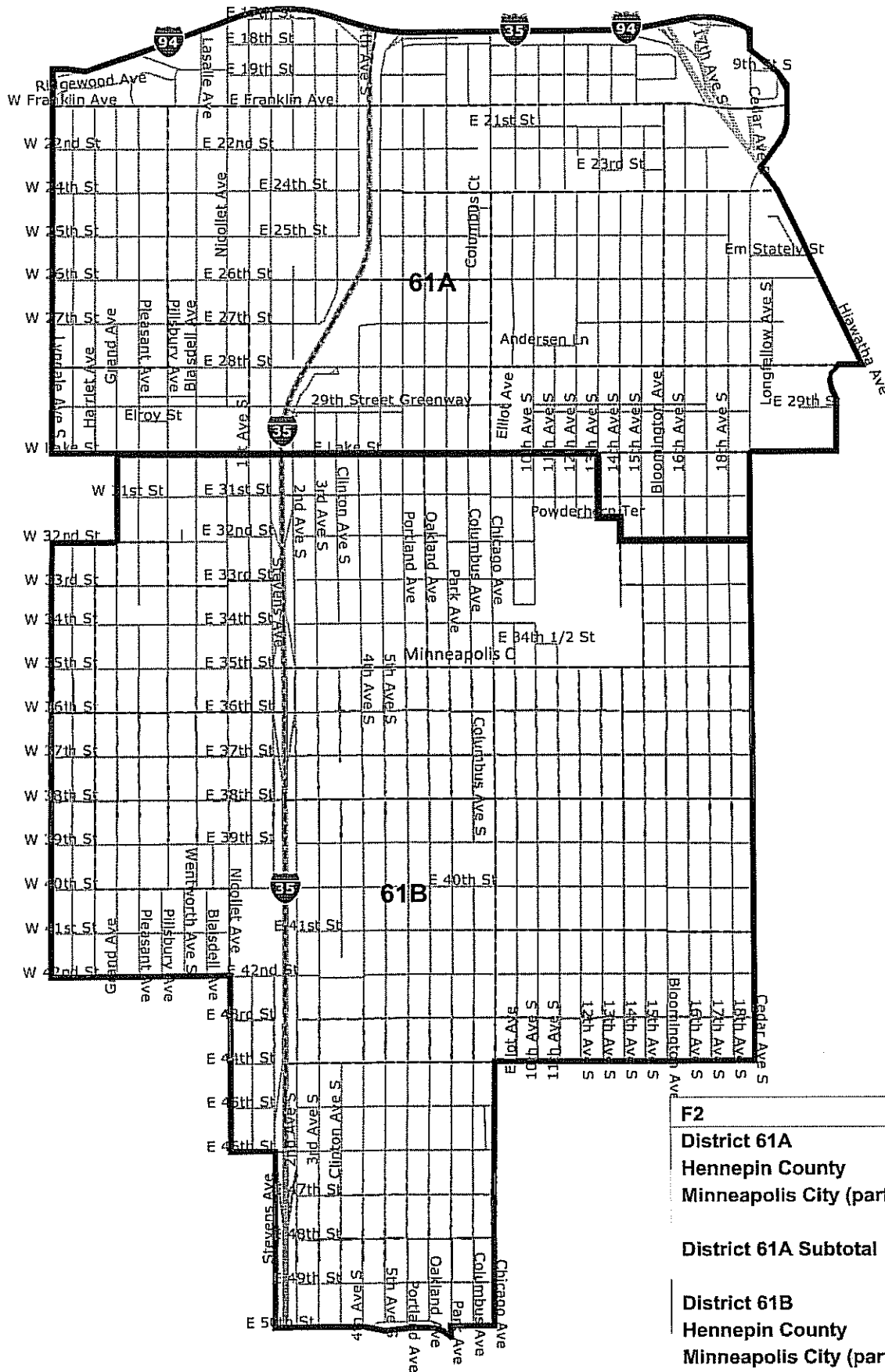
F2	F11
District 59A	
Anoka County	
Columbia Heights City (pt.)	10,992
Anoka County Subtotal	10,992
Hennepin County	
Minneapolis City (part)	20,209
St. Anthony City	5,156
Hennepin County Subtotal	25,365
Ramsey County	
MCD: St. Anthony City	3,070
Ramsey County Subtotal	3,070
District 59A Subtotal	39,427
District 59B	
Hennepin County	
Minneapolis City (part)	39,494
District 59B Subtotal	39,494

Britton et al State Legislative Plan District 60A and 60B



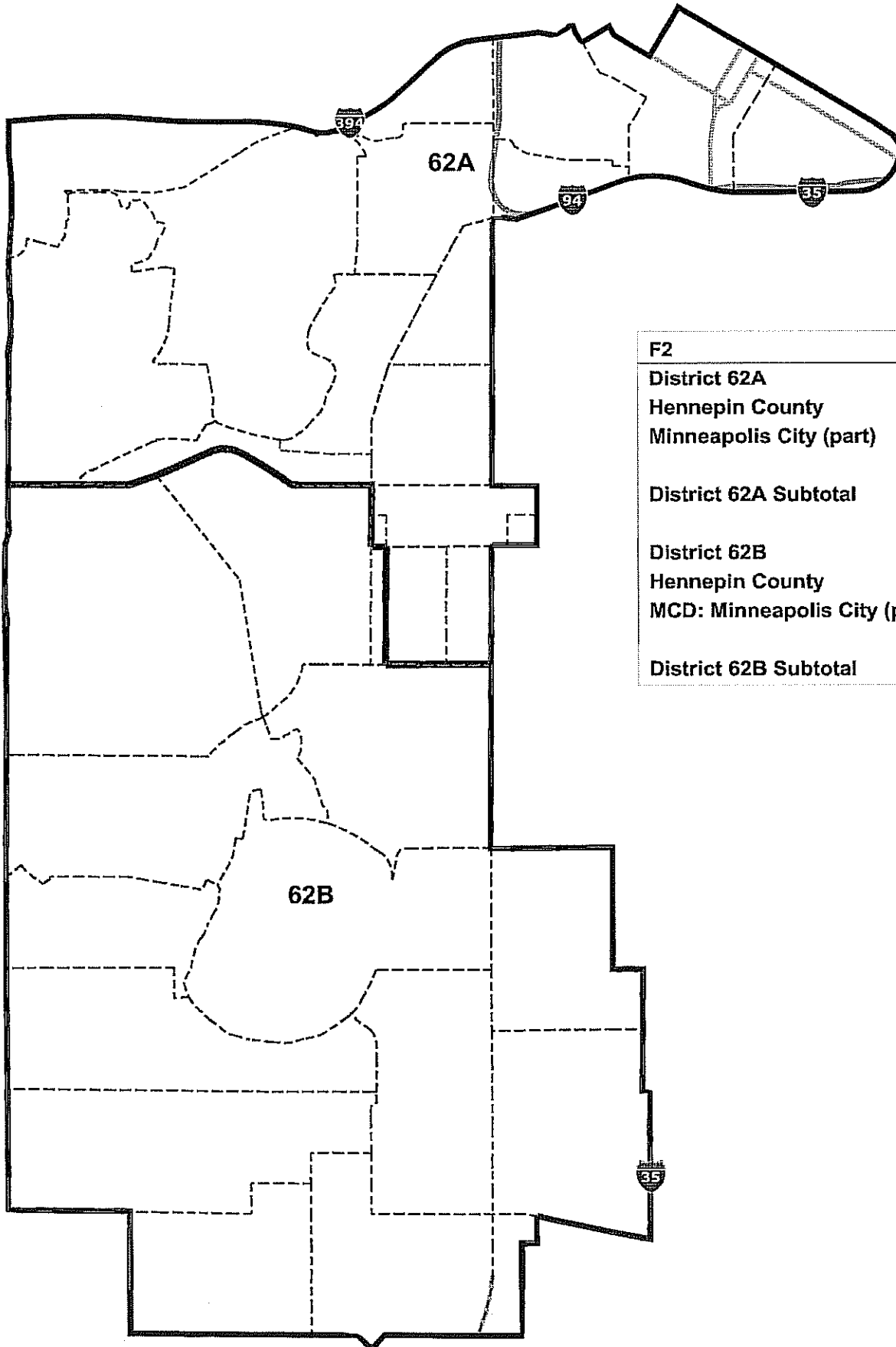
F2	F11
District 60A	
Hennepin County	
Minneapolis City (part)	39,466
District 60A Subtotal	39,466
District 60B	
Hennepin County	
Minneapolis City (part)	39,455
District 60B Subtotal	39,455

Britton et al State Legislative Plan District 61A and 61B



F2	F11
District 61A	
Hennepin County	
Minneapolis City (part)	39,496
District 61A Subtotal	39,496
District 61B	
Hennepin County	
Minneapolis City (part)	39,542
District 61B Subtotal	39,542

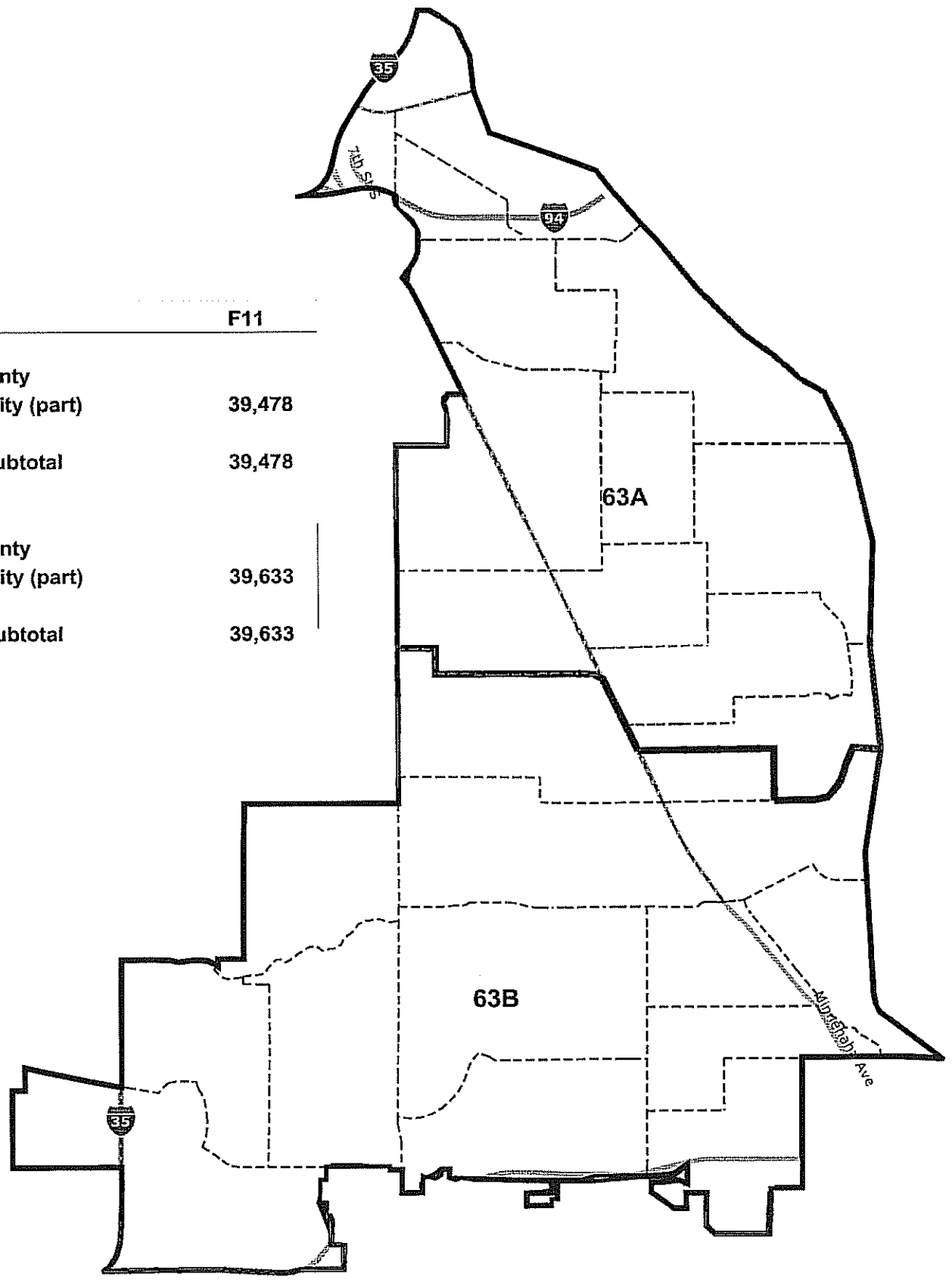
Britton et al State Legislative Plan District 62A and 62B



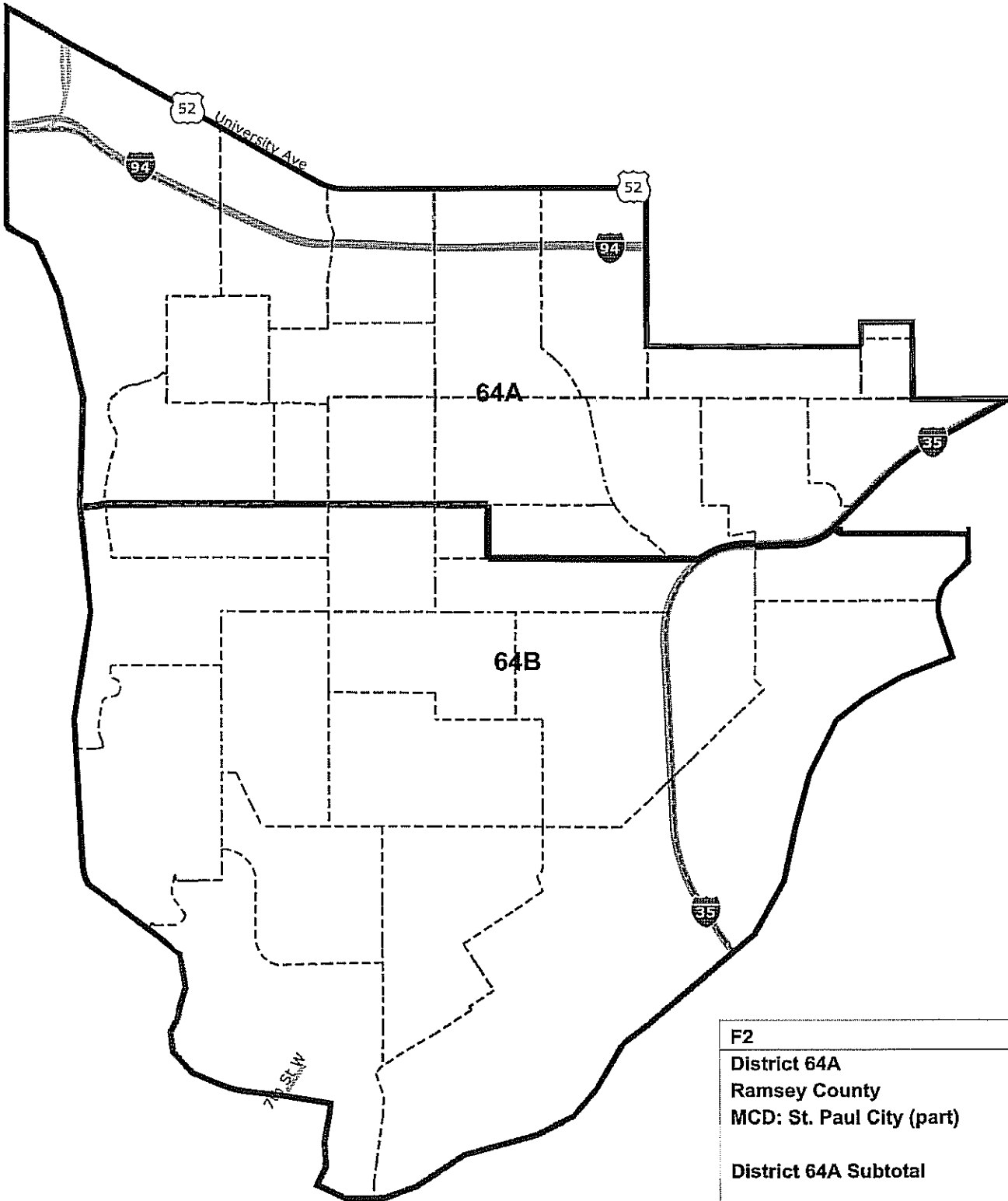
F2	F11
District 62A	
Hennepin County	
Minneapolis City (part)	39,467
District 62A Subtotal	39,467
District 62B	
Hennepin County	
MCD: Minneapolis City (par	39,603
District 62B Subtotal	39,603

Britton et al State Legislative Plan District 63A and 63B

F2	F11
District 63A	
Hennepin County	
Minneapolis City (part)	39,478
District 63A Subtotal	39,478
District 63B	
Hennepin County	
Minneapolis City (part)	39,633
District 63B Subtotal	39,633



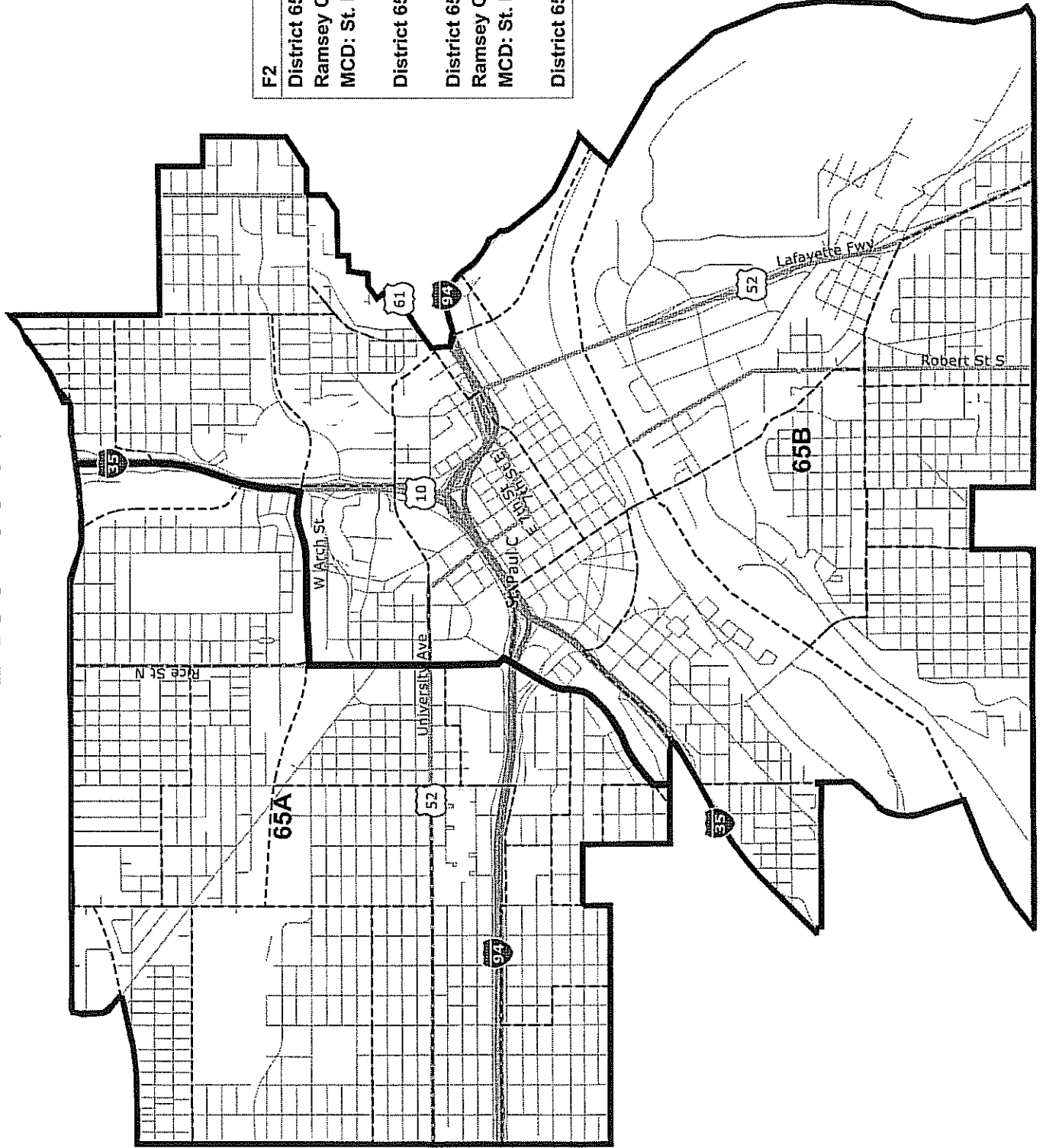
Britton et al State Legislative Plan District 64A and 64B



F2	F11
District 64A	
Ramsey County	
MCD: St. Paul City (part)	39,711
District 64A Subtotal	39,711
District 64B	
Ramsey County	
MCD: St. Paul City (part)	39,502
District 64B Subtotal	39,502

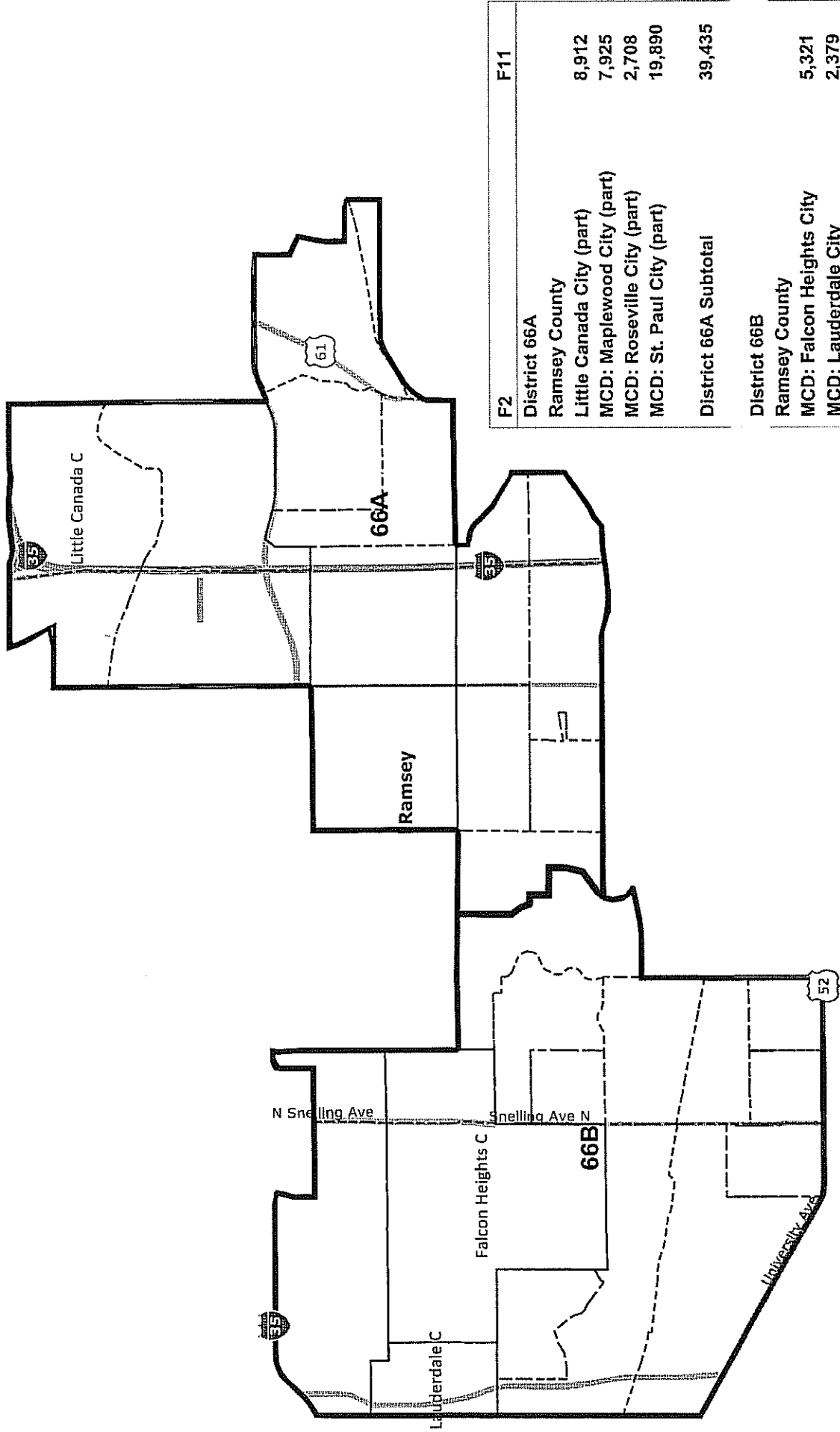
Britton et al State Legislative Plan

District 65A and 65B

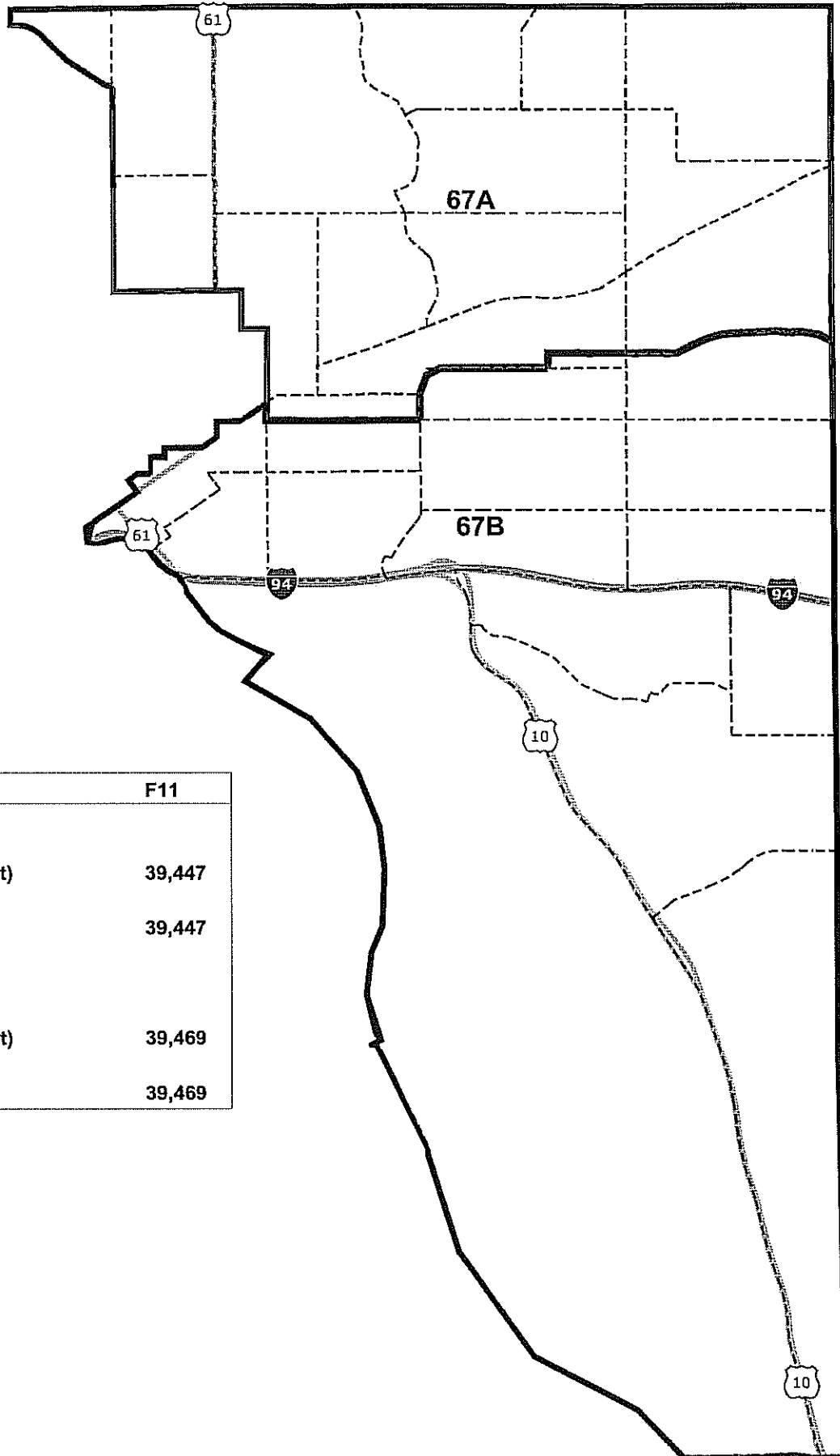


F2	F11
District 65A	
Ramsey County	
MCD: St. Paul City (part)	39,582
District 65A Subtotal	39,582
District 65B	
Ramsey County	
MCD: St. Paul City (part)	39,481
District 65B Subtotal	39,481

Britton et al State Legislative Plan District 66A and 66B



Britton et al State Legislative Plan District 67A and 67B



F2	F11
District 67A	
Ramsey County	
MCD: St. Paul City (part)	39,447
District 67A Subtotal	39,447
District 67B	
Ramsey County	
MCD: St. Paul City (part)	39,469
District 67B Subtotal	39,469