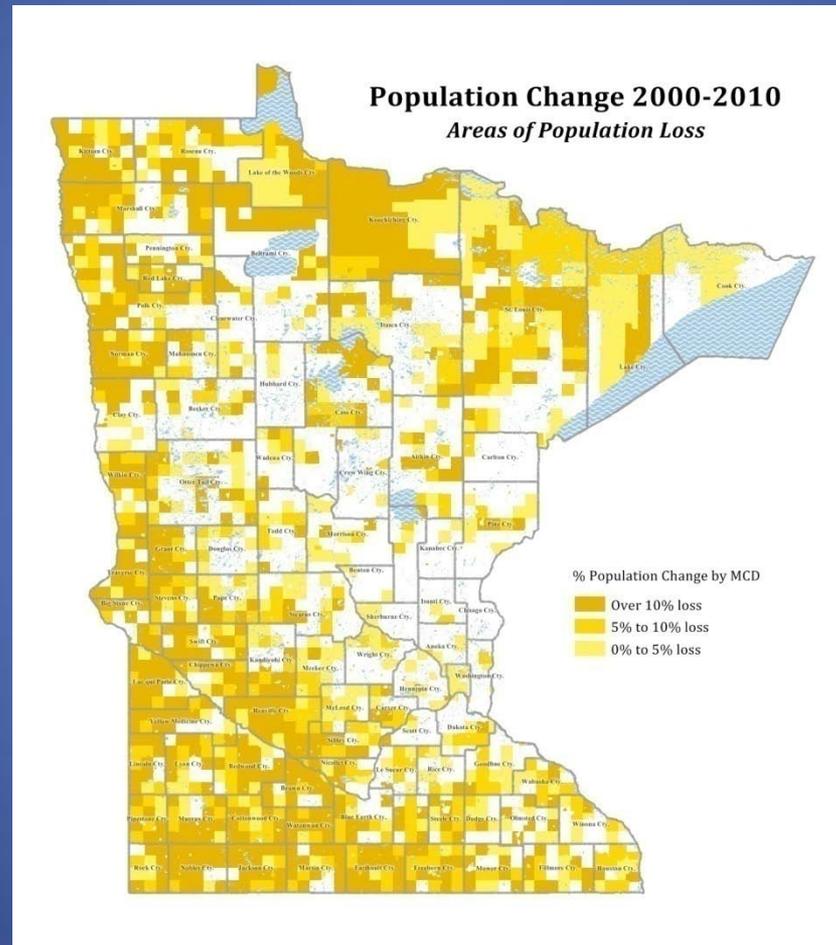


Plaintiffs Sara Hippert *et al.*

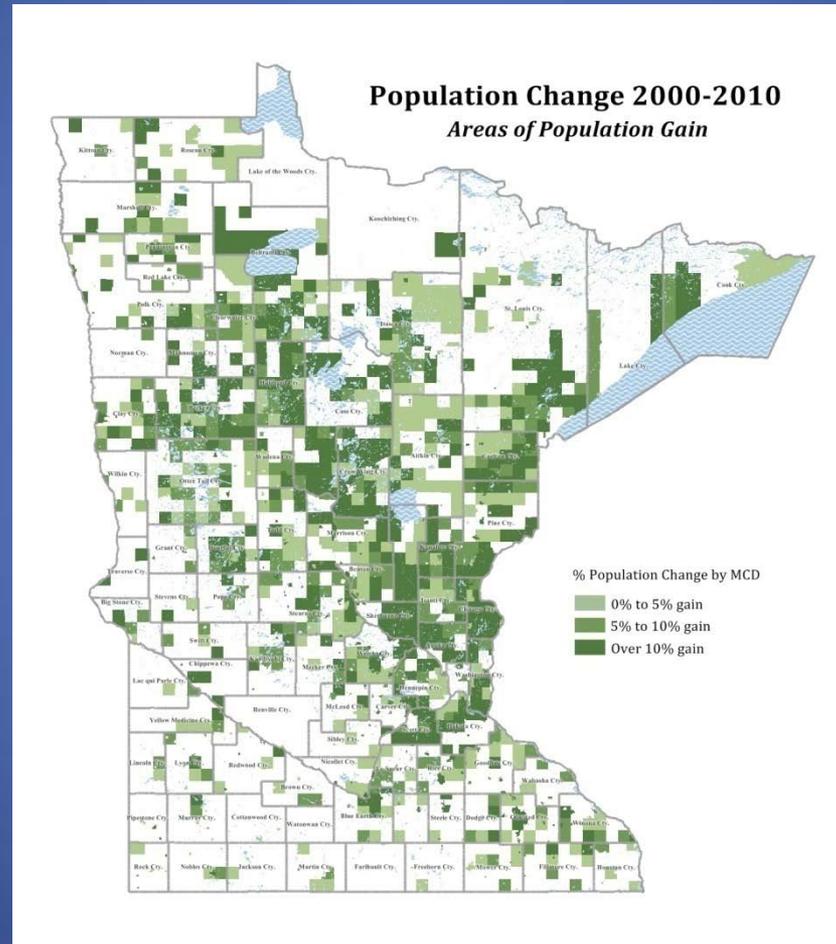
Argument in Support of Proposed
Redistricting Plans

Changes in Minnesota 2000-2010

Population Losses in Minnesota 2000-2010



Population Gains in Minnesota 2000-2010



Hippert Plans

History of Plaintiffs' Plans

- 24 public hearings over 5 months
- Made public in spring of 2011
- Passed by both MN House and Senate
- Vetoed by Governor Dayton
- Available for public analysis and comments during the Panel's hearings in fall of 2011
- Legislative plan incorporates changes based on public comment

Redistricting Principles

Plaintiffs' Proposed Criteria

- Aim for population equality ($\pm 1\%$ for legislative districts)
- Prioritize preservation of political subdivisions
- Consider “identifiable” communities of interest
- Political impact should not be considered

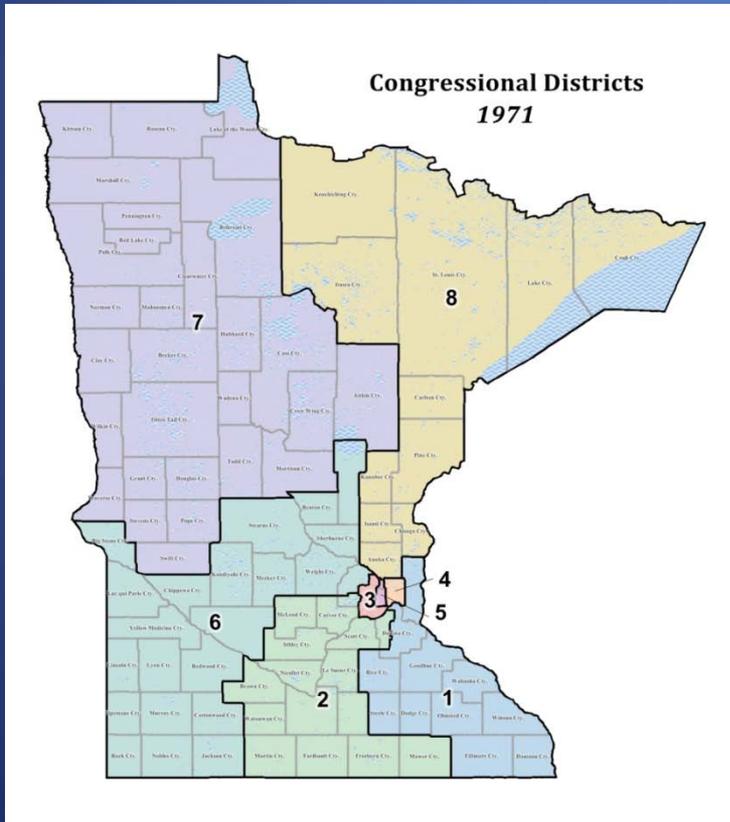
Panel's Criteria

- Aim for population equality ($\pm 2\%$ for legislative districts)
- Prioritize preservation of political subdivisions
- Consider “persuasively established” communities of interest
- Consider political impact as a subordinate criterion

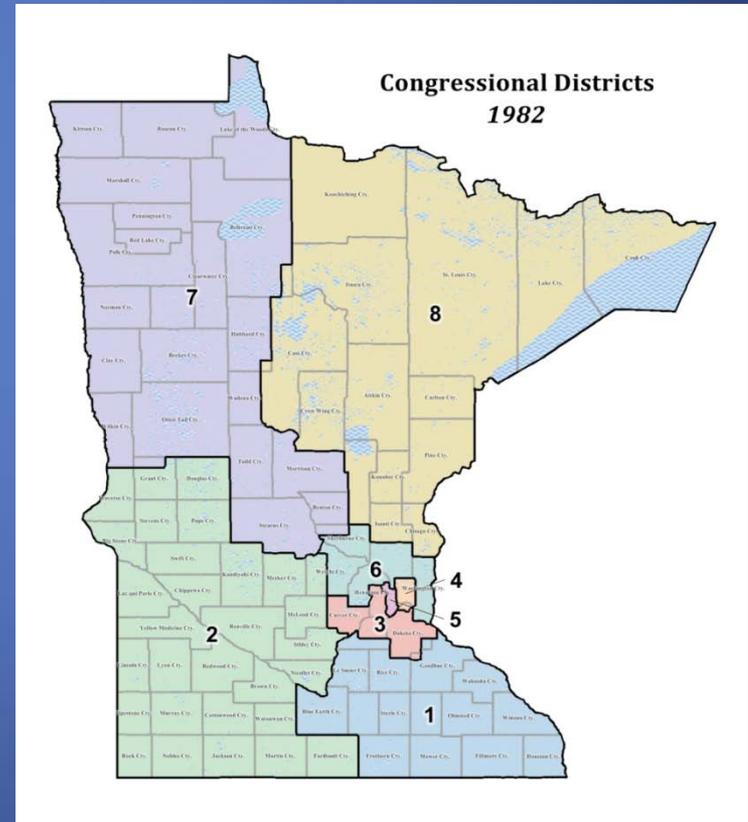
Plaintiffs' Congressional Plan

Congressional Redistricting Maps 1970s & 1980s

Beens v. Erdahl (D. Minn. 1971)

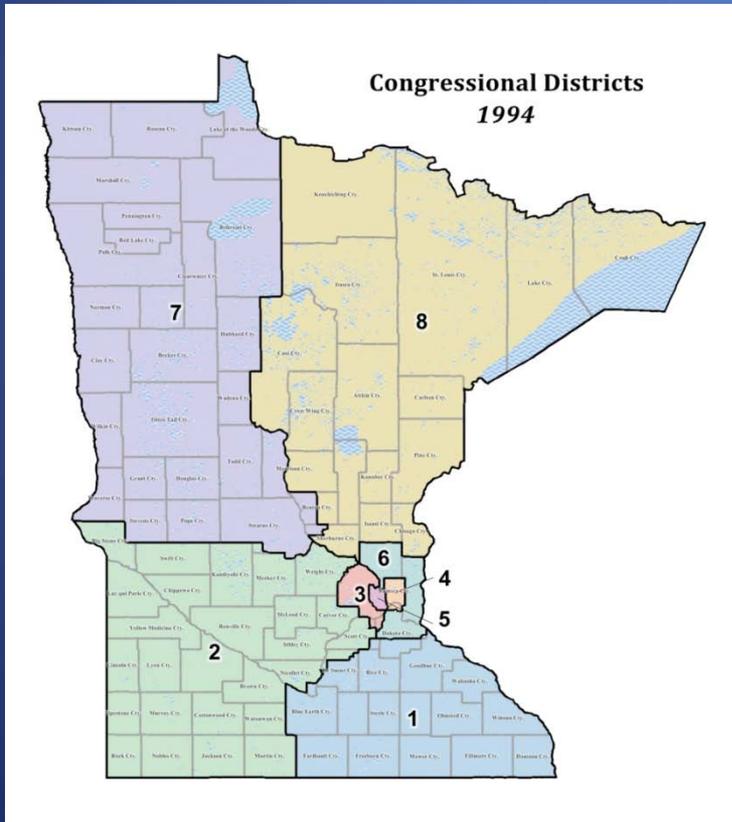


LaComb v. Grove (D. Minn. 1982)

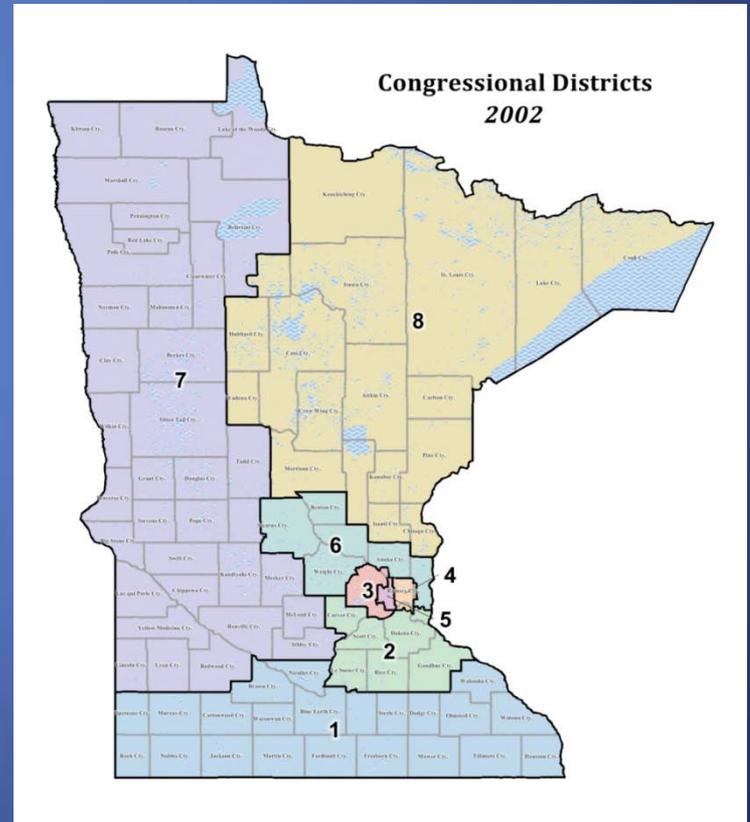


Congressional Redistricting Maps 1990s & 2000s

Cotlow v. Grove (Minn. 1994)



Zachman v. Kiffmeyer (Minn. 2002)



Changes to Minnesota's Congressional Districts From 1970 to Today

- Moved from 5 rural and 3 metro districts to 5 metro and 3 rural districts
- Moved from 3 districts in southern part of the state to 1 district in south
- Southernmost and northernmost districts consistently expanded west
- Urban core remained relatively stable while suburban districts expanded

How Plaintiffs Drew Their Congressional Map

- Focused on current population and population trends
- Incorporated convenience, contiguity, compactness
- Avoided unnecessary splits
- Protected communities of interest
- Considered federal/congressional concerns

Plaintiffs' Congressional Plan Compared to *Zachman*

	Hippert Congressional Plan	<i>Zachman</i> Congressional Plan
Number of Counties Split	7	8
Number of Times Counties Are Split	8	13
Number of MCDs Split	7	7
Number of Times MCDs Are Split	7	7
Minority Opportunity Districts (Total Population)	2	0
Minority Opportunity Districts (Voting Age Population)	1	0
Number of Incumbents Paired	0	2

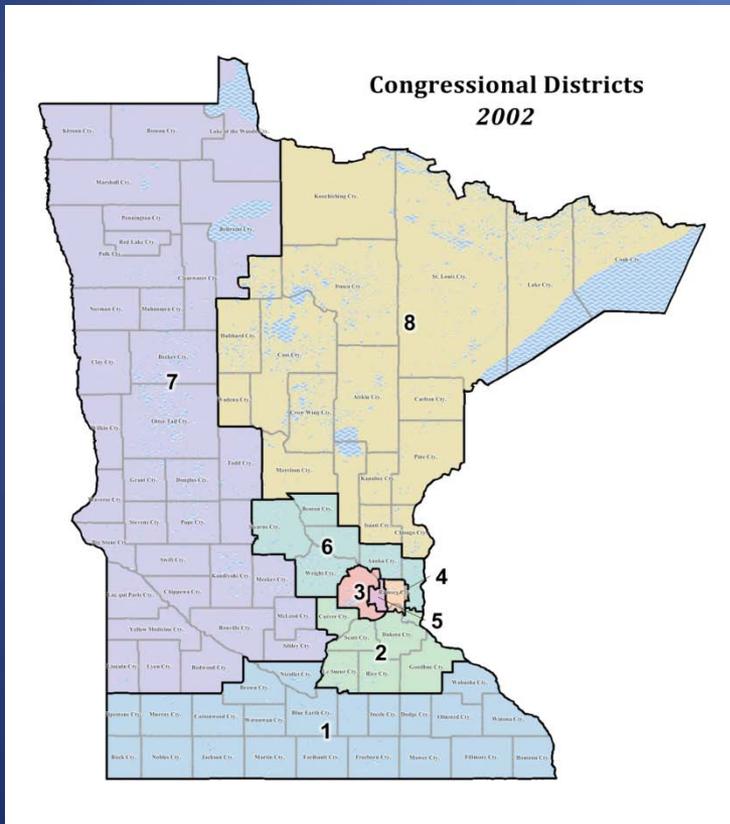
Plaintiffs' Congressional Plan Compared to the Other Parties'

	Hippert Congressional Plan	Martin Congressional Plan	Britton Congressional Plan
Number of Counties Split	7	7	7
Number of Times Counties Are Split	8	9	10
Number of MCDs Split	7*	7	10
Number of Times MCDs Are Split	7	7	10
Minority Opportunity Districts (Voting Age Population)	1	1	0
Number of Incumbents Paired	0	2	0

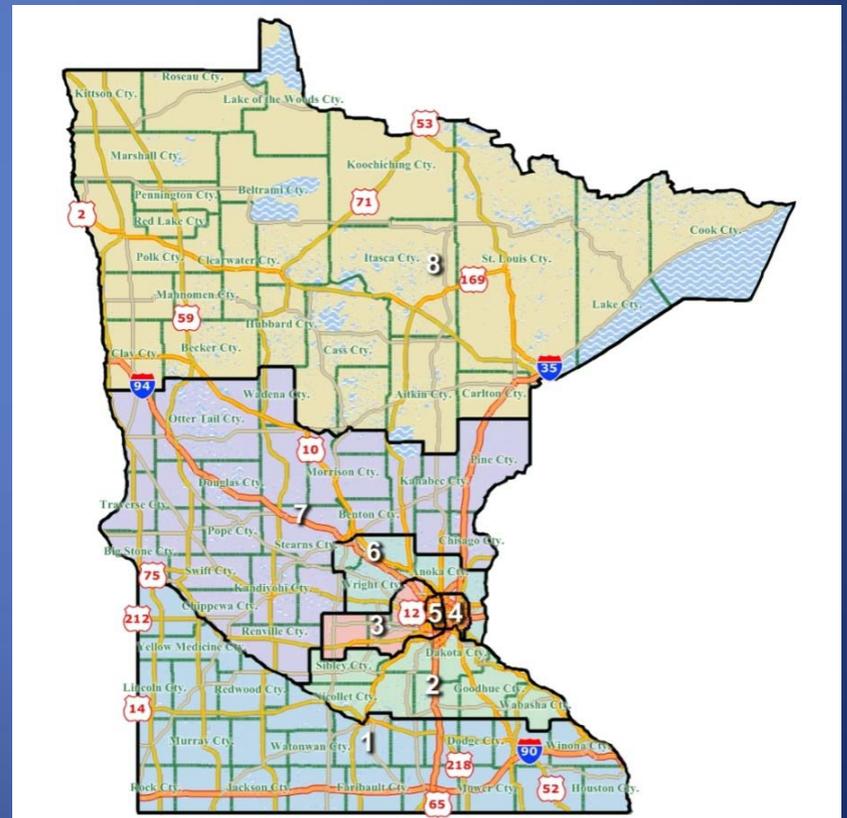
*Plaintiffs located splits in more populous areas that are better suited to handle them.

3-3-2 Configuration

Zachman Congressional Plan

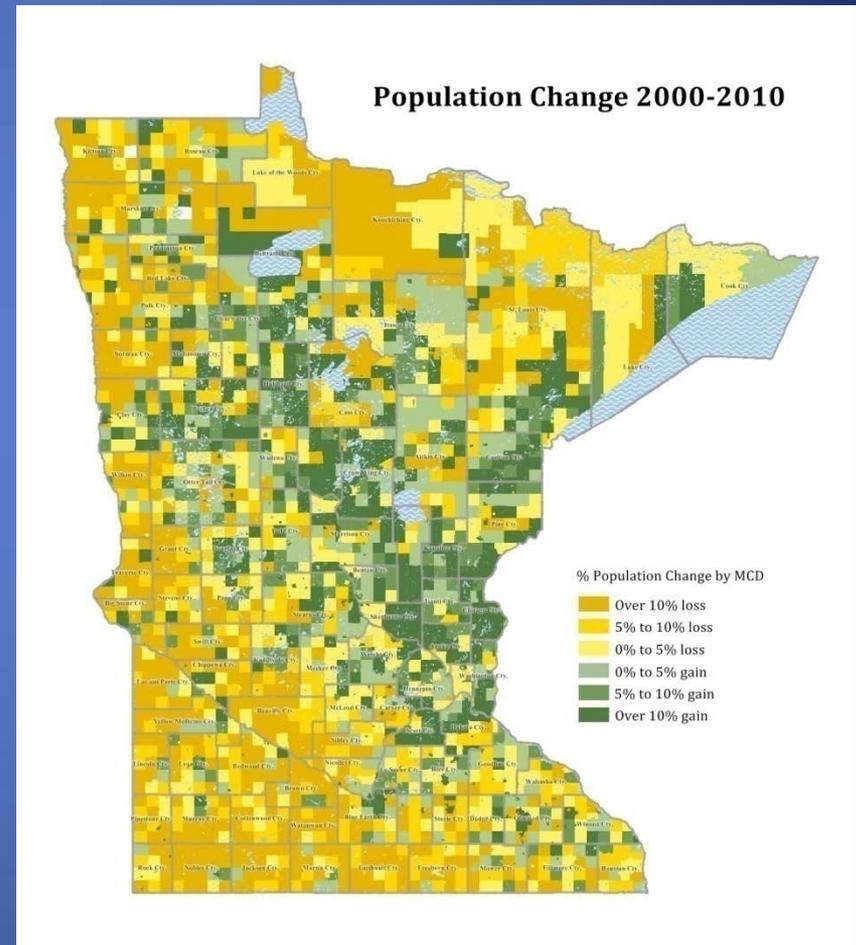


Hippert Congressional Plan

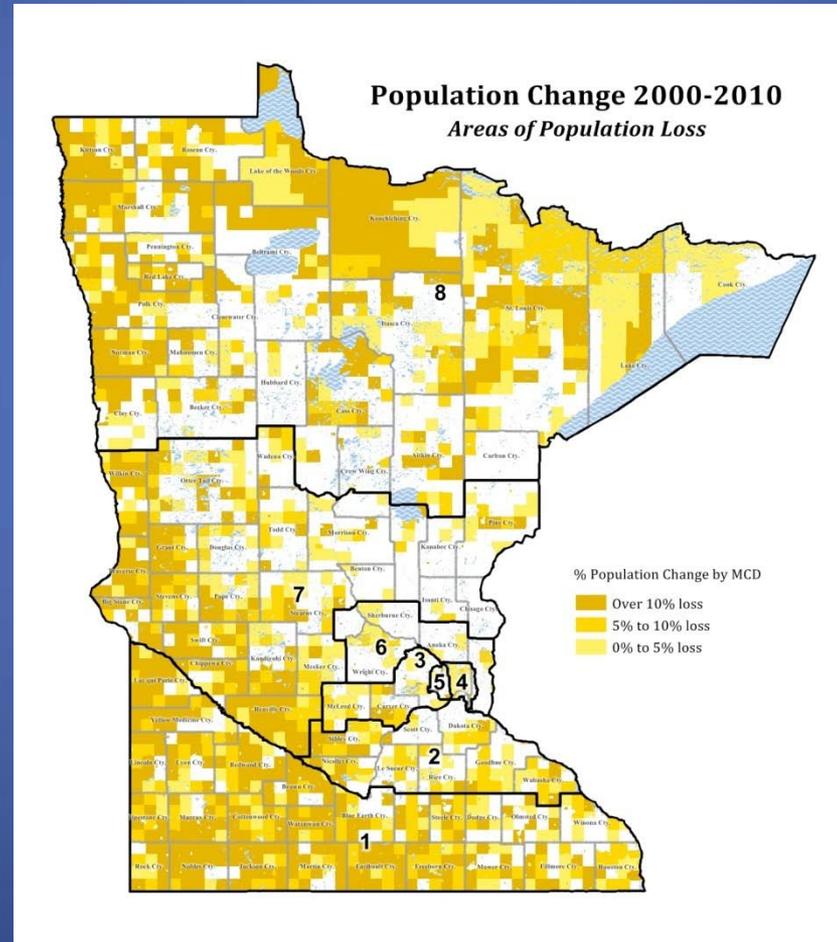


A “Least Changes” Map Is Not Workable

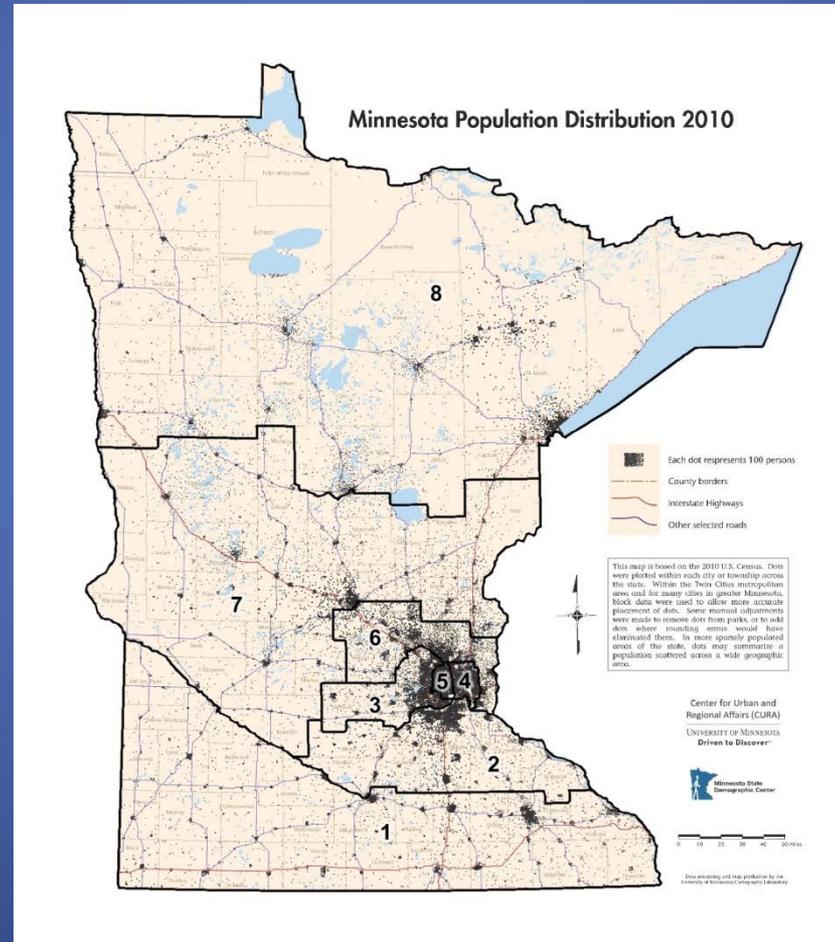
- Population changes in the past decade require significant changes.
- Adding population to existing districts has a domino effect elsewhere.
- Redistricting requires a broader view and consideration of other factors.
- No party proposes a “least changes” map.



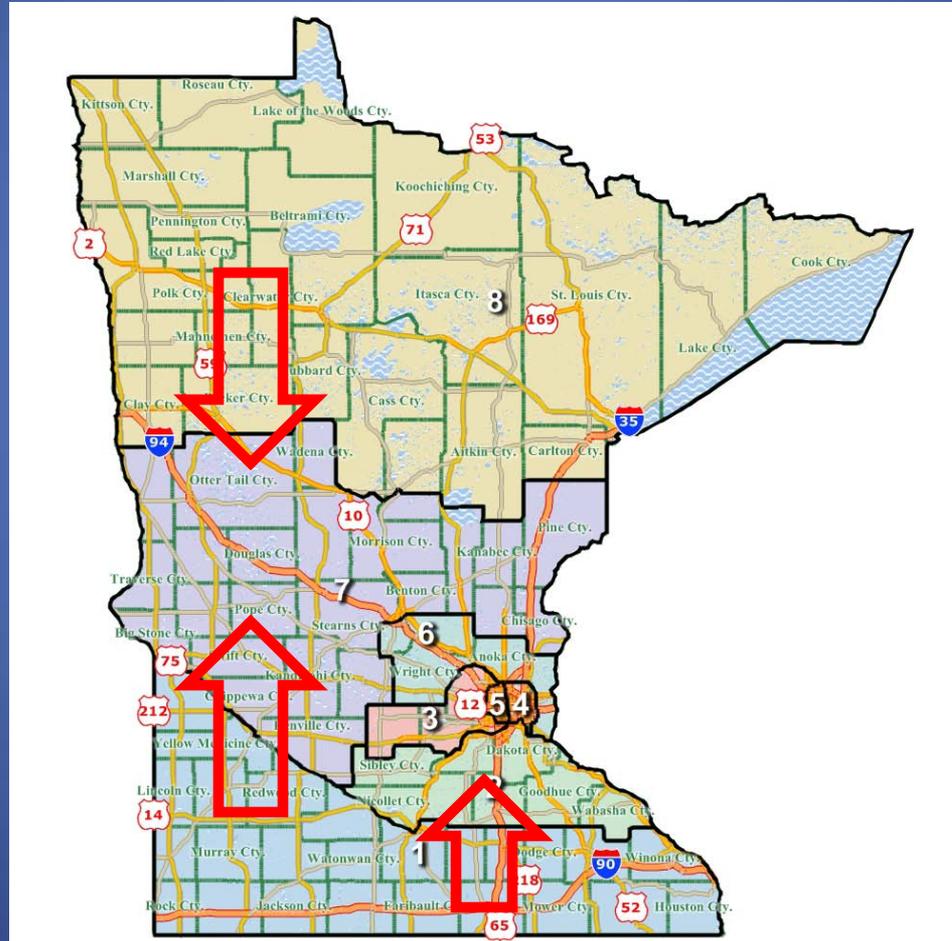
Plaintiffs' Plan Addresses Minnesota's Changing Population

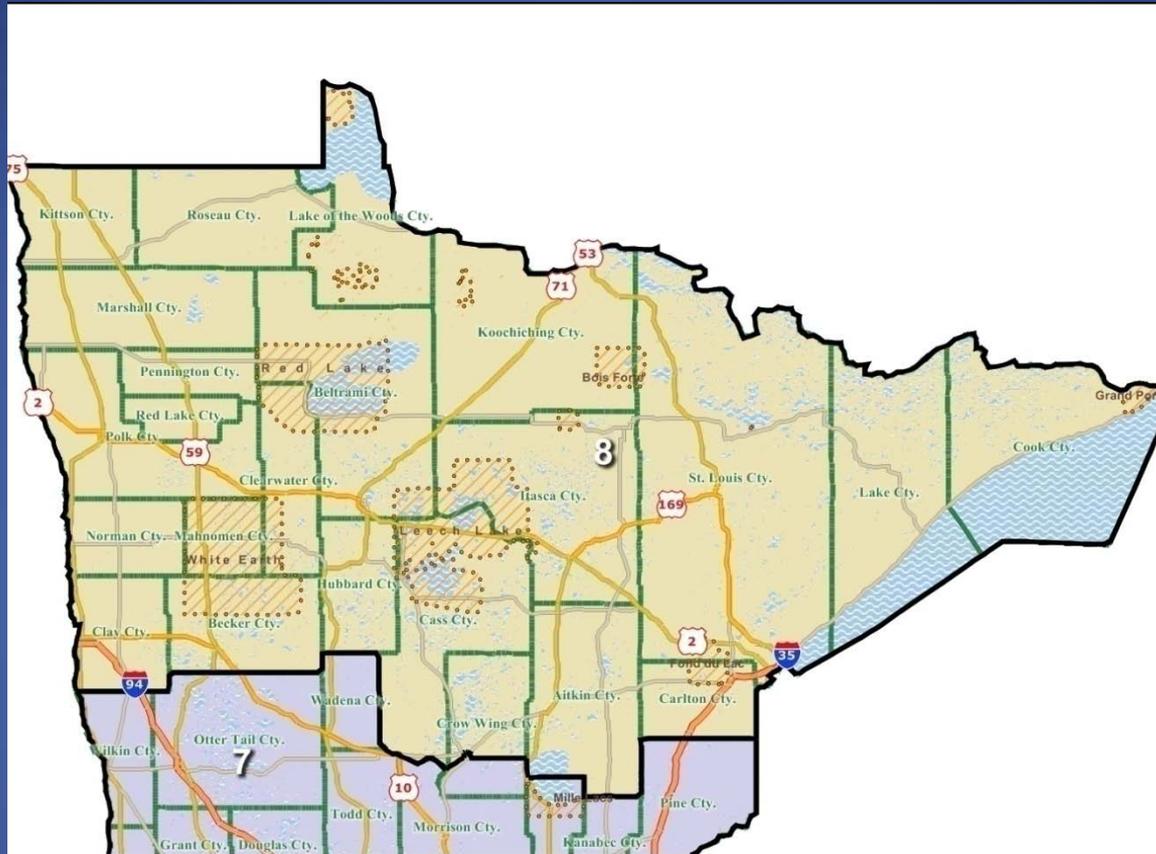


Plaintiffs' Plan Addresses Minnesota's Changing Population



Plaintiffs' Plan Can Accommodate Future Population Changes



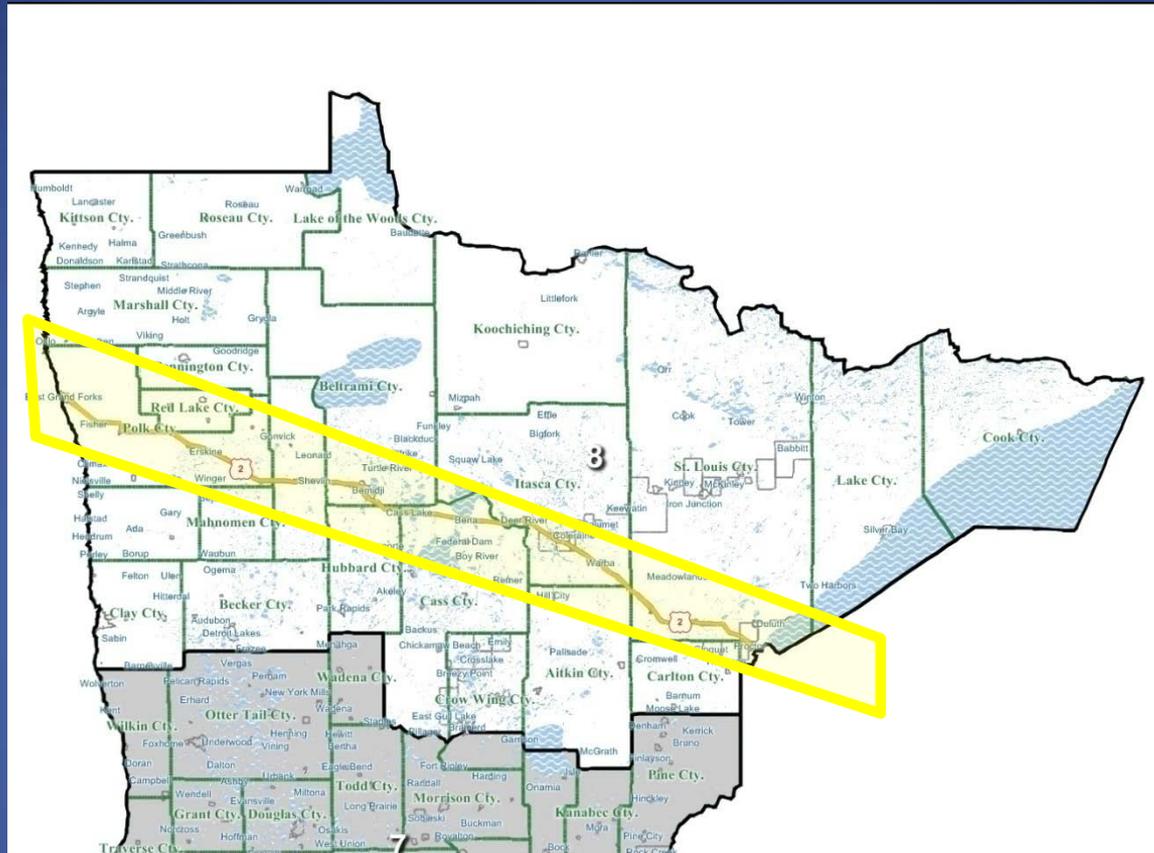


Plaintiffs' 8th Congressional District

- An “Up North” district

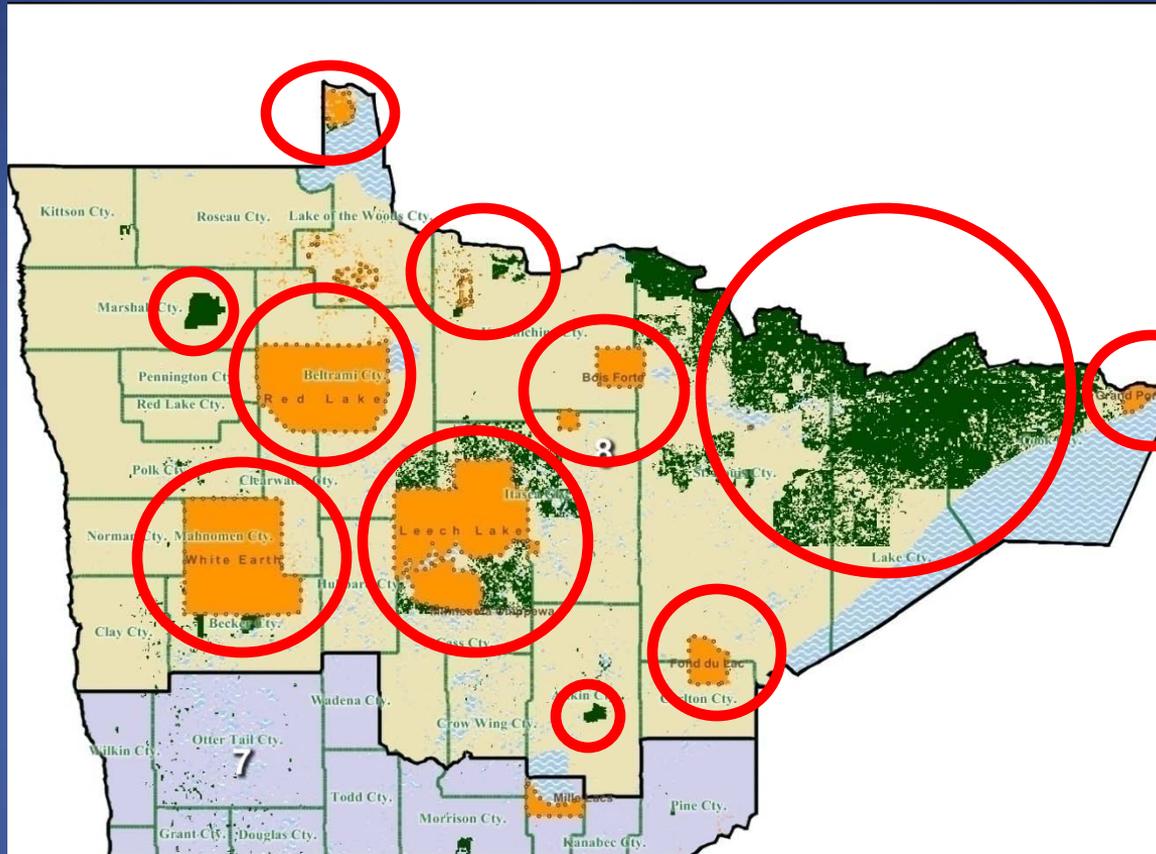
Plaintiffs' 8th Congressional District

- An “Up North” district
- Continues westward expansion of 8th district over past 4 decades as population declined
- Recognizes federal communities of interest created by the international border, tribal areas, federal lands, and state forests



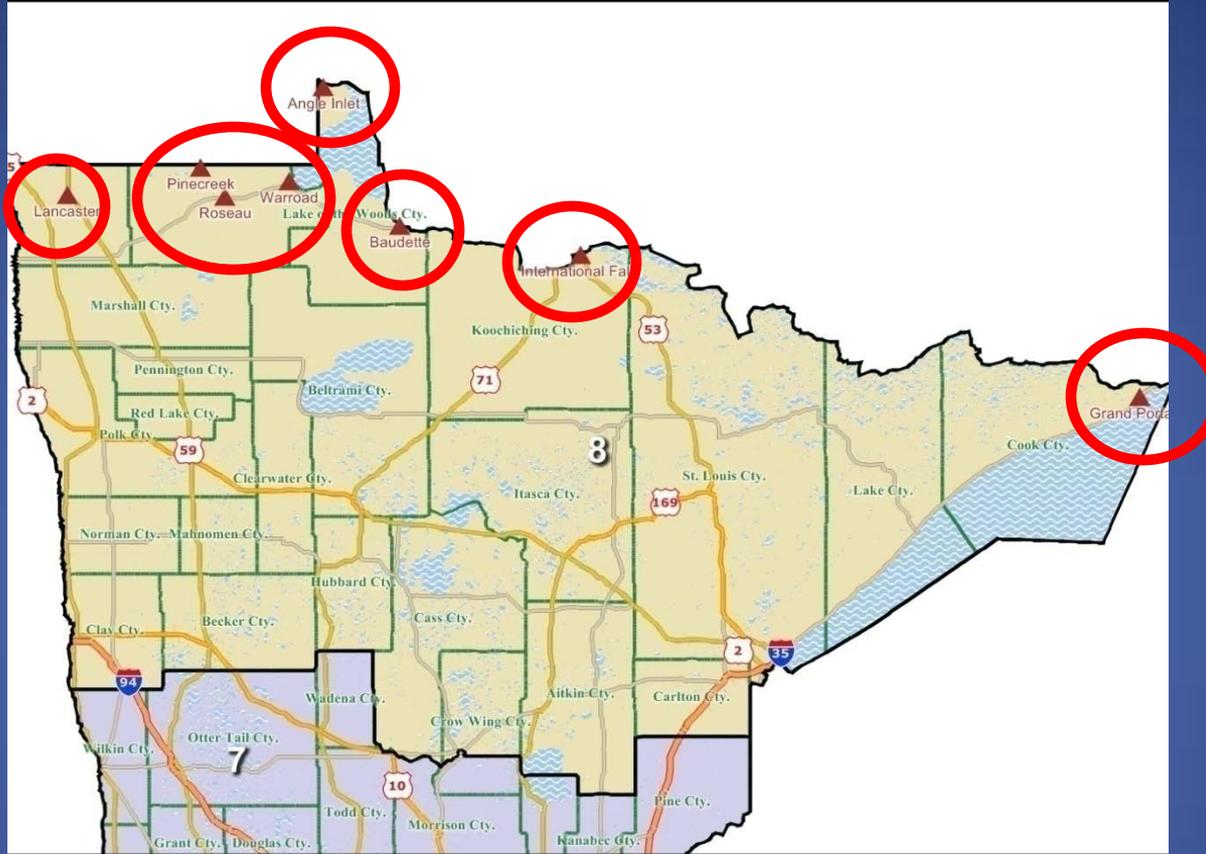
Plaintiffs' 8th Congressional District

- Connected by the Highway 2 transportation corridor



Plaintiffs' 8th Congressional District

- Protects the communities of interest created by tribal areas and federal lands

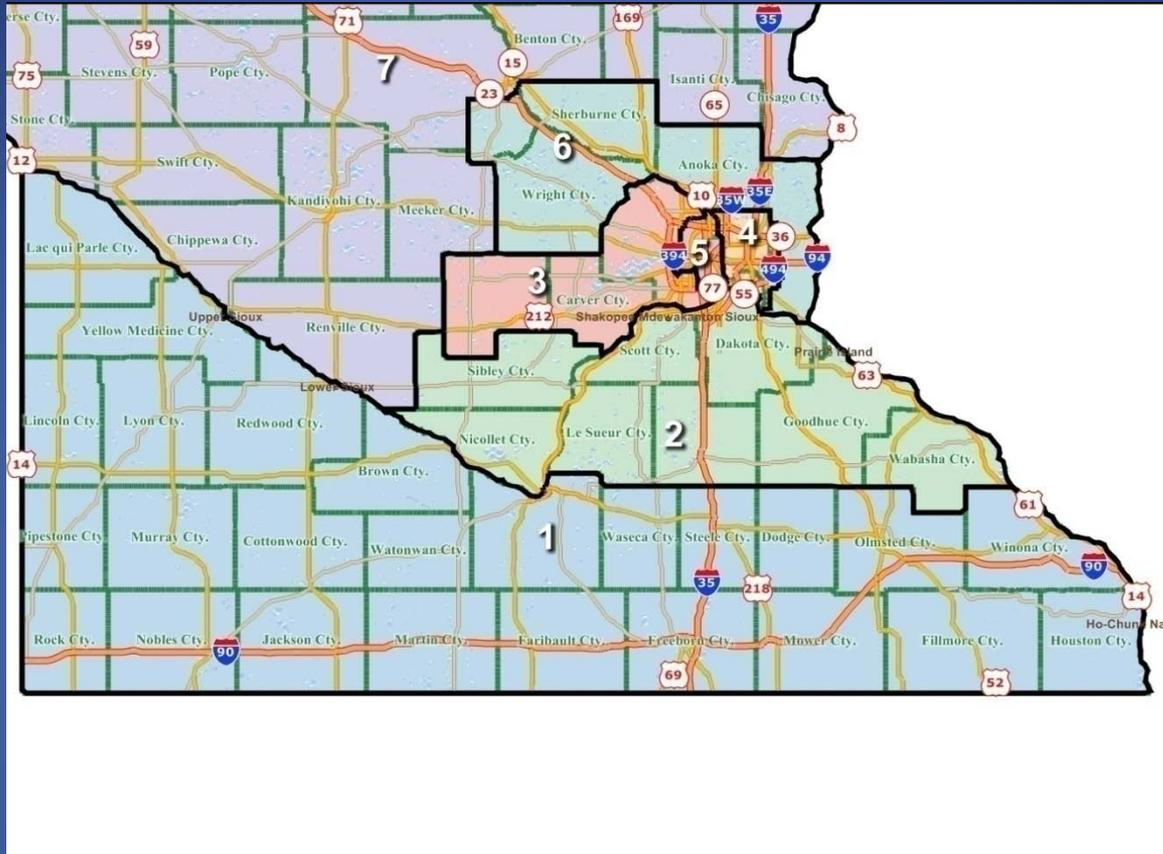


Plaintiffs' 8th Congressional District

- Protects the community of interest created by the international border with Canada

Plaintiffs' 8th Congressional District

- Addresses continuing population changes in northern Minnesota
- Continues the westward expansion of the 8th district over the past 4 decades
- Protects communities of interest in northern Minnesota and recognizes the unique “Up North” character of the region
- Mirrors the *Zachman* approach to southern Minnesota in the 1st congressional district

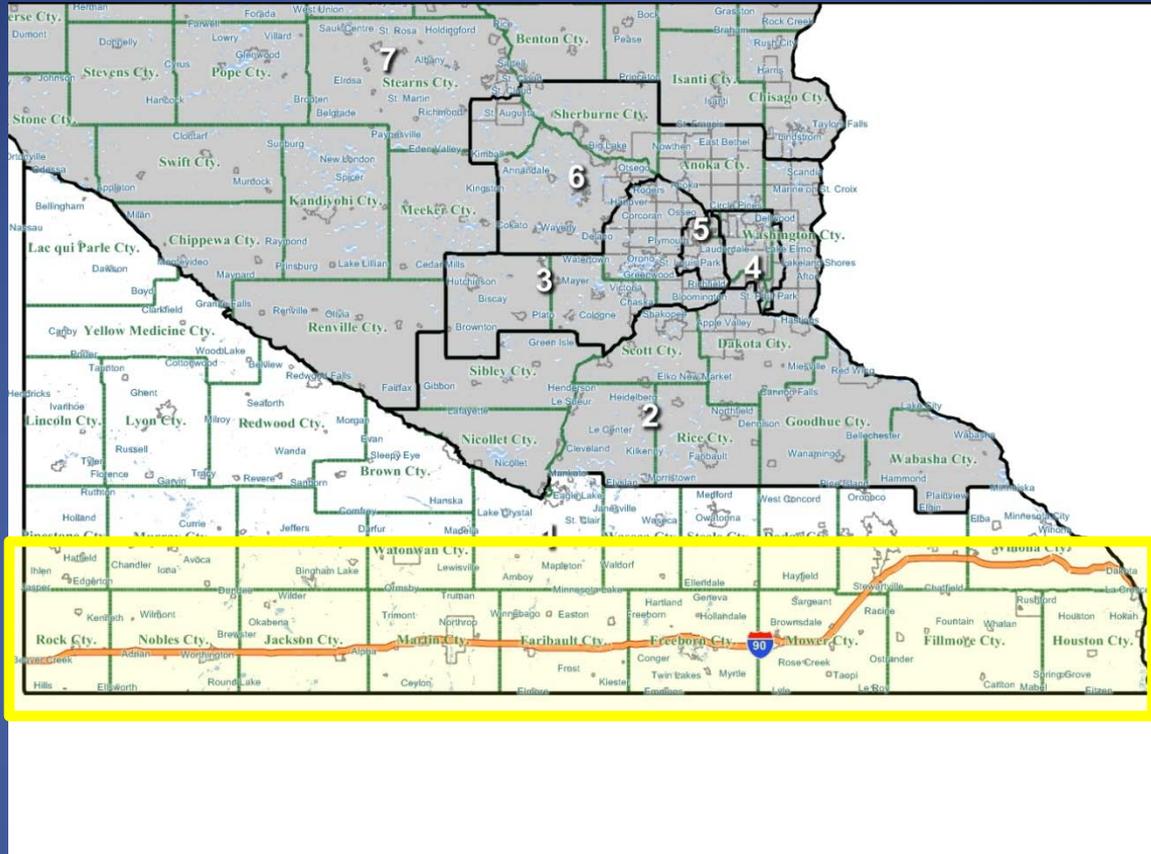


Plaintiffs' 1st Congressional District

- A southern Minnesota district

Plaintiffs' 1st Congressional District

- Addresses the continuing population declines in southwestern Minnesota
- Continues the approach of *Zachman* and previous redistricting panels in creating fewer districts, not more, in southern Minnesota
- Protects the I-90 corridor and agricultural communities of interest in southern Minnesota



Plaintiffs' 1st Congressional District

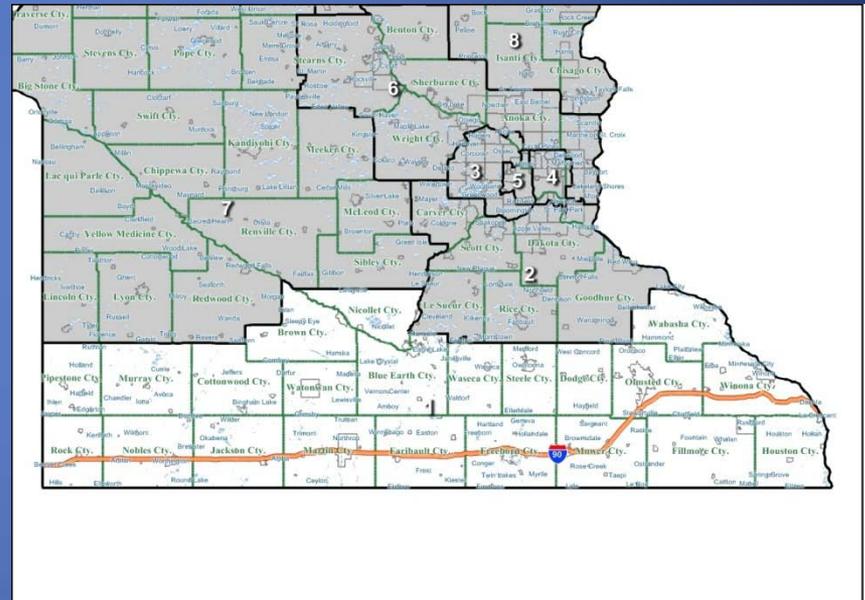
- Like *Zachman*, Plaintiffs' 1st district is connected by the Interstate 90 transportation corridor

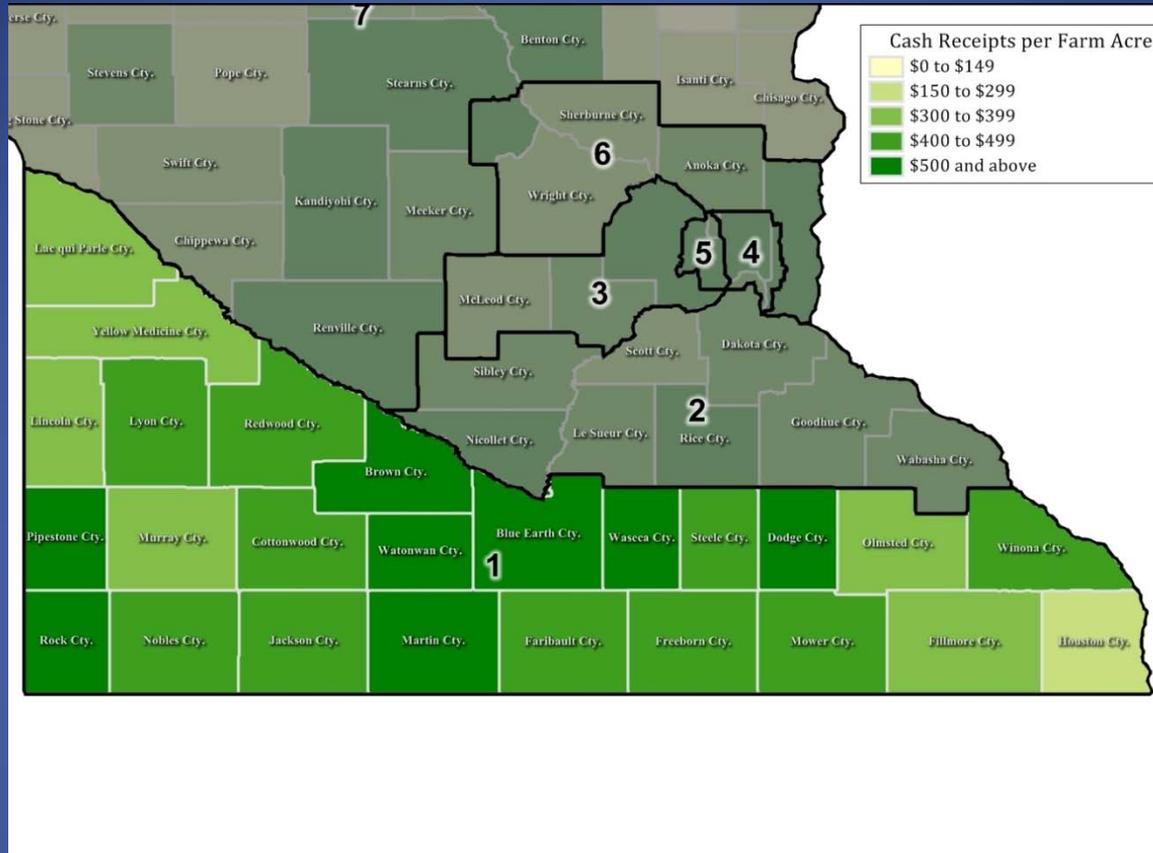
Plaintiffs' 1st Congressional District

Zachman 1st District

A community of interest “naturally arises along a highway such as Interstate 90 and tends to run in an east-to-west direction in southern Minnesota.”

Zachman, Final Order Adopting a Congressional Redistricting Plan, at 6 (Mar. 19, 2002)



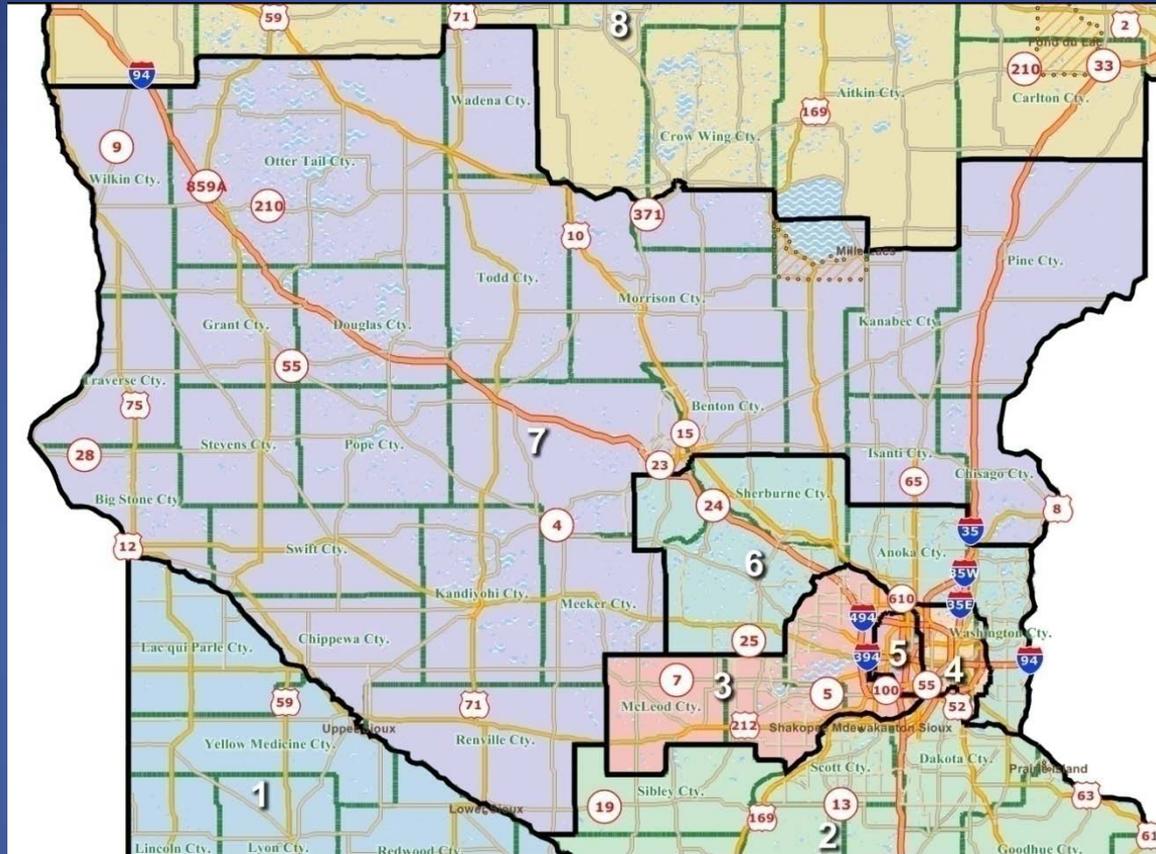


Plaintiffs' 1st Congressional District

- Protects agricultural interests in southern Minnesota
- Follows natural borders

Plaintiffs' 1st Congressional District

- A logical extension of the approach of the *Zachman* Panel and previous redistricting panels
- Protects communities of interest in southern Minnesota
- Utilizes established county boundaries and the Minnesota River as borders

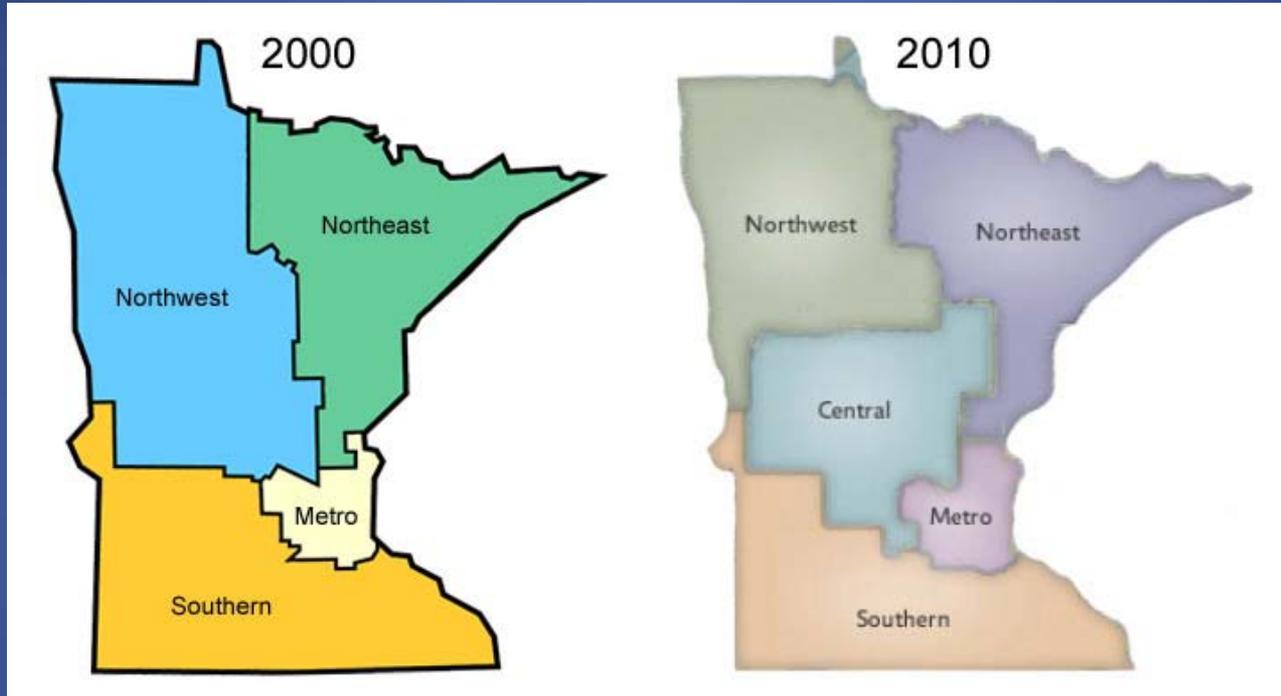


Plaintiffs' 7th Congressional District

- A central Minnesota district

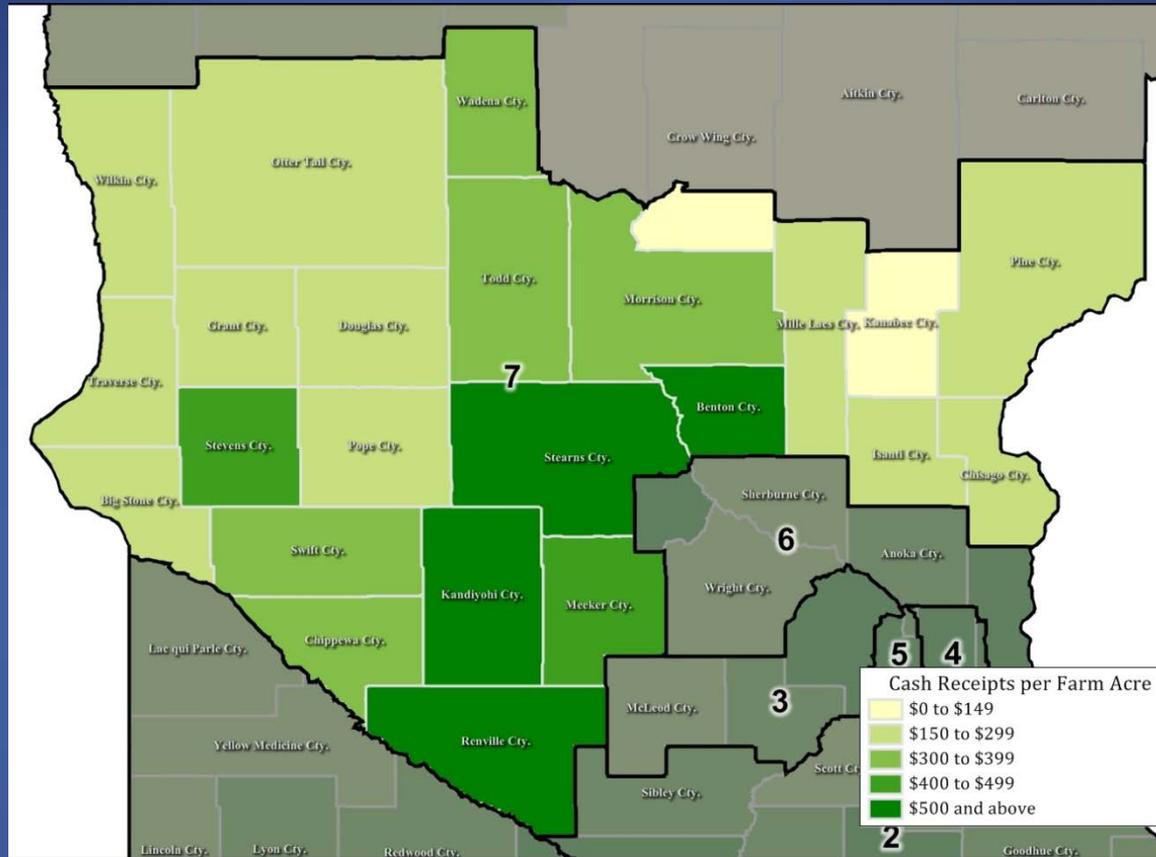
Plaintiffs' 7th Congressional District

- Recognizes the developing region of central Minnesota that is distinct
- Protects similar agricultural communities of interest
- Anchored by St. Cloud and similar out-state cities, like Alexandria, Fergus Falls, Wadena, and Hinckley



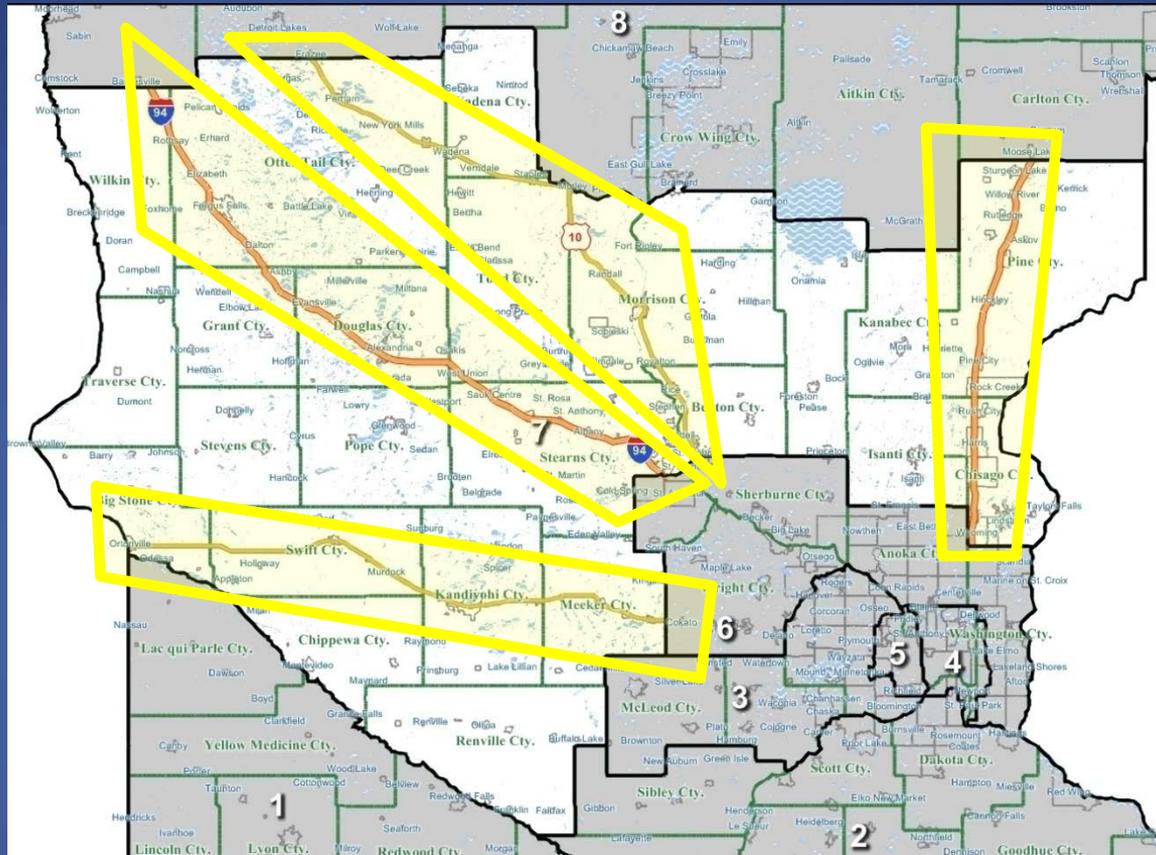
Explore Minnesota Regions

- Central Minnesota is a developing region



Plaintiffs' 7th Congressional District

- Protects agricultural interests in Central Minnesota



Plaintiffs' 7th Congressional District

- Connected by Highway 12, I-94, Highway 10, and I-35

Plaintiffs' 7th Congressional District

- Recognizes the unique character of central Minnesota
- Protects similar agricultural communities of interest
- Utilizes Minnesota River as a natural border
- Provides a logical direction for future growth

Plaintiffs' Other Congressional Districts

- **6th District:** A North and East Metro exurban district, similar to the *Zachman* 6th district
- **5th District:** Minneapolis and nearby northern suburbs, resulting in a minority opportunity district
- **4th District:** St. Paul and nearby suburbs, resulting in a minority opportunity district
- **3rd District:** A West Metro district
- **2nd District:** A “South of the River” District, combining similar communities in the south metro

Advantages of Plaintiffs' Congressional Plan

- Achieves population equality
- Addresses population changes of past decade
- Minimizes political subdivision splits
- Protects the rural regions of Minnesota today and in the future
- Recognizes federal interests in northern Minnesota
- No incumbent pairings

Plaintiffs' Legislative Plan

How Plaintiffs Drew Their Legislative Map

- Focused on objective criteria
- Identified logical groupings of counties and cities
- Drew house districts first – a practical way to satisfy the Panel’s criteria
- Incorporated convenience, contiguity, compactness
- Avoided unnecessary splits
- Used rivers and major roads as borders
- Preserved communities of interest, like neighborhoods

Plaintiffs' Legislative Plan Compared to *Zachman*

	Hippert House Districts	<i>Zachman</i> House Districts	Hippert Senate Districts	<i>Zachman</i> Senate Districts
Mean Deviation	0.59% (234 persons)	0.32% (118 persons)	0.46% (366 persons)	0.28% (206 persons)
Number of Counties Split	40	50	29	31
Number of MCDs Split	39	46	28	25
Minority Opportunity Districts (Total Population)	16	11	8	6
Minority Opportunity Districts (Voting Age)	12	9	6	3

Plaintiffs' Legislative Plan Compared to the Other Parties' (House Districts)

	Hippert House Districts	Martin House Districts	Britton House Districts
Mean Deviation	0.59% (234 persons)	0.51% (203 persons)	0.23% (102 persons)
Number of Counties Split	40	49	52
Number of MCDs Split	39	66	86
Minority Opportunity Districts (Total Population)	16	17	14
Minority Opportunity Districts (Voting Age)	12	12	13

Plaintiffs' Legislative Plan Compared to the Other Parties' (Senate Districts)

	Hippert Senate Districts	Martin Senate Districts	Britton Senate Districts
Mean Deviation	0.46% (366 persons)	0.40% (315 persons)	0.17% (131 persons)
Number of Counties Split	29	38	41
Number of MCDs Split	28	45	59
Minority Opportunity Districts (Total Population)	8	8	8
Minority Opportunity Districts (Voting Age)	6	6	7

Population Deviations

- Should be minimized
- Are permissible when made to effectuate rational state policies.
- Plaintiffs' Plan is well within Panel's $\pm 2\%$ threshold
- All of Plaintiffs' population deviations are based on legitimate state policies, like the preservation of political subdivisions.

Political Subdivisions

Minnesota law requires that “political subdivisions not be divided more than necessary to meet constitutional requirements.”

Minn. Stat. § 2.91, subd. 2.

Political Subdivisions

“Counties, cities, and townships constitute some of Minnesota’s most fundamental communities of interest and centers of local government.”

Zachman, Final Order Adopting a Legislative Redistricting Plan, at 3 (Mar. 19, 2002).

Political Subdivisions

“[C]reating an additional political subdivision split for such a small change in population was not a favorable trade.”

Zachman, Final Order Adopting a Legislative Redistricting Plan,
at 4 n.2 (Mar. 19, 2002)

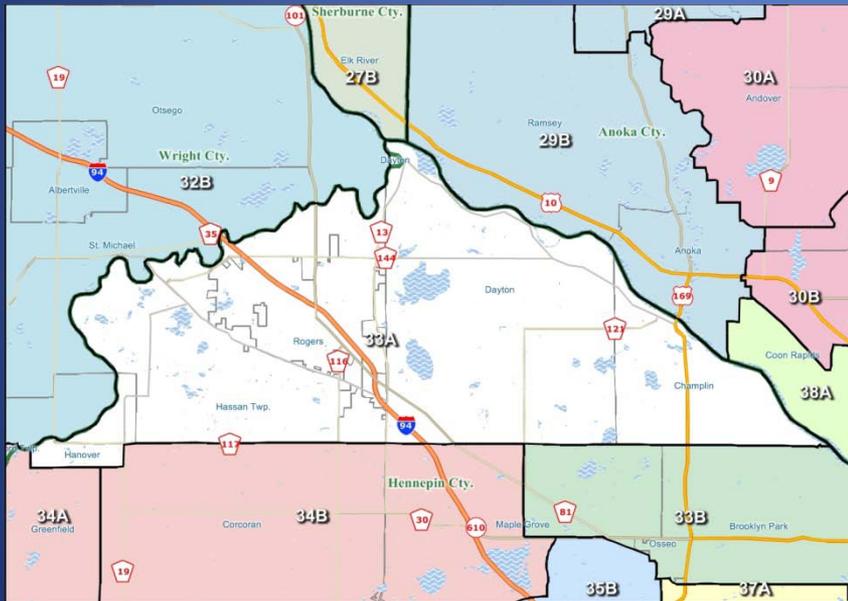
Political Subdivisions

The Secretary of State has requested that the Panel “draw district lines in a way that minimizes jurisdictional splits and therefore eases administrative burdens on the local jurisdictions that actually conduct the elections as well as on the state.”

See Response of Secretary of State Mark Ritchie, Ex. A (Dec. 8, 2011).

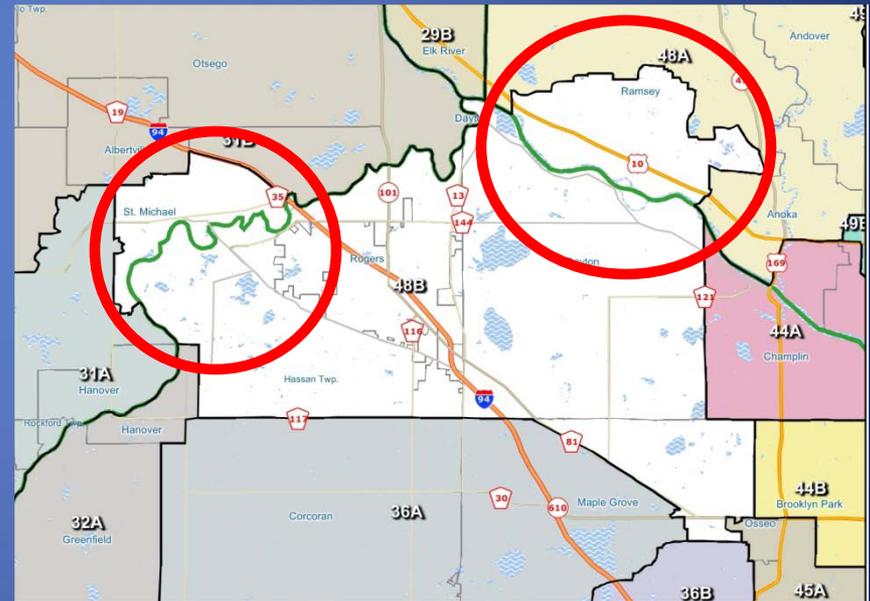
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 33A (Rogers, Dayton, Champlin area)



- Groups similar communities
- Uses rivers as borders

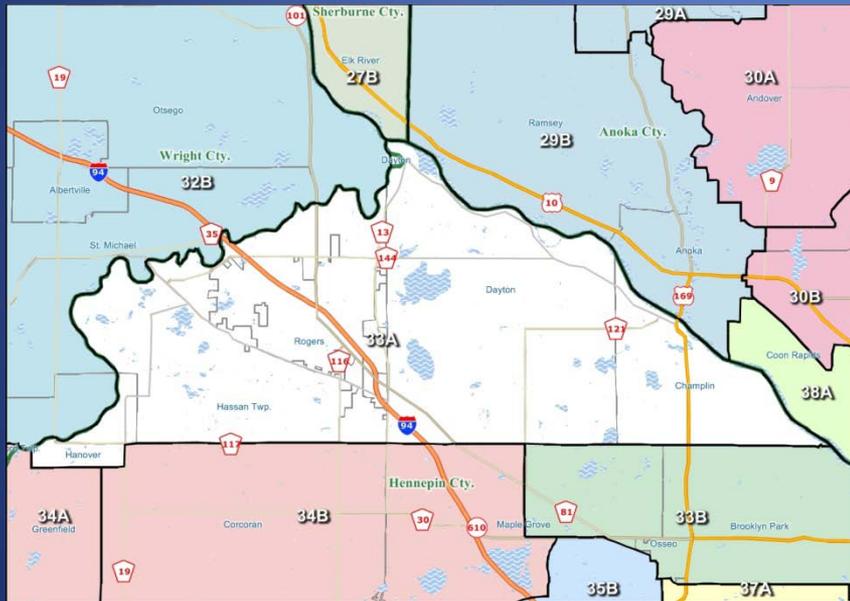
Martin House District 48B (Rogers, Dayton, Champlin area)



- Splits political subdivisions
- Crosses rivers needlessly

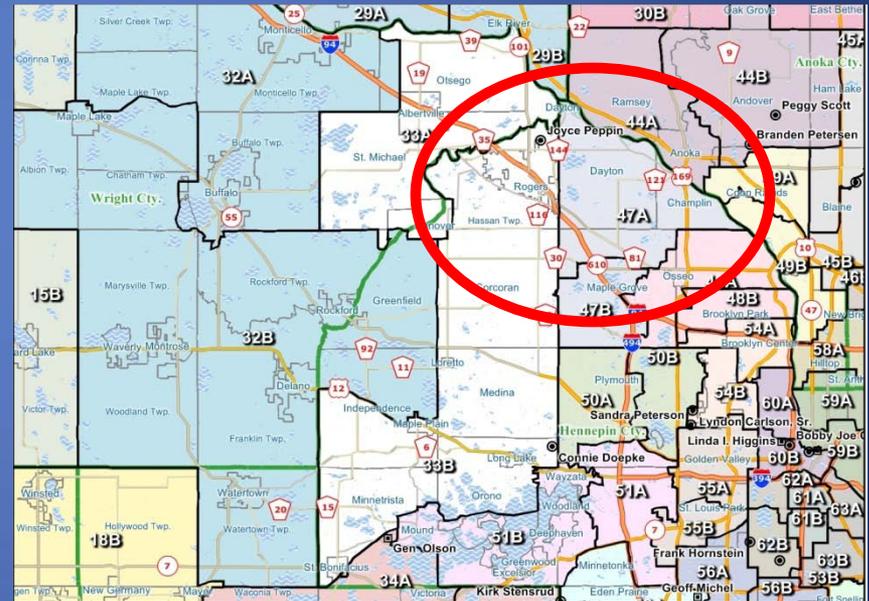
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 33A (Rogers, Dayton, Champlin area)



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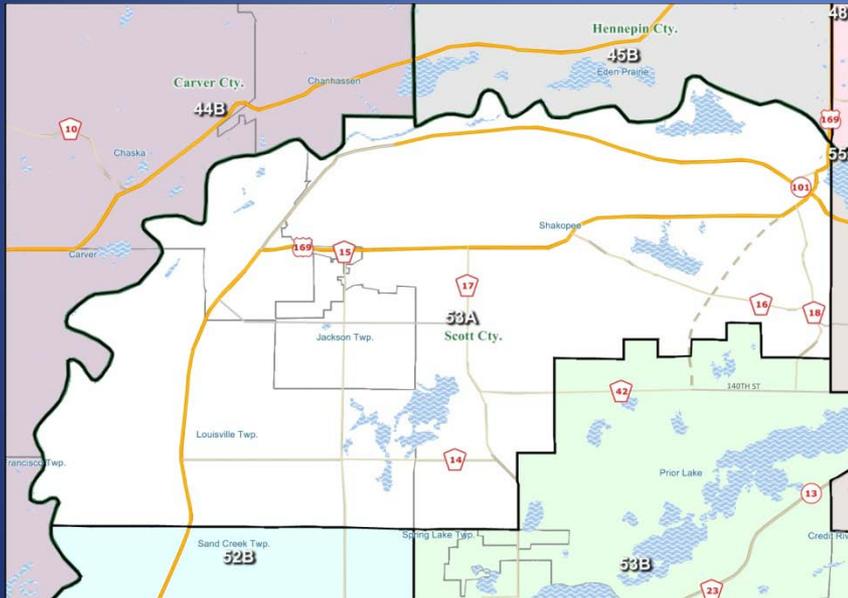
Britton House District 33B (Rogers, Corcoran, Medina, Orono area)



- Groups dissimilar communities
- Splits political subdivisions

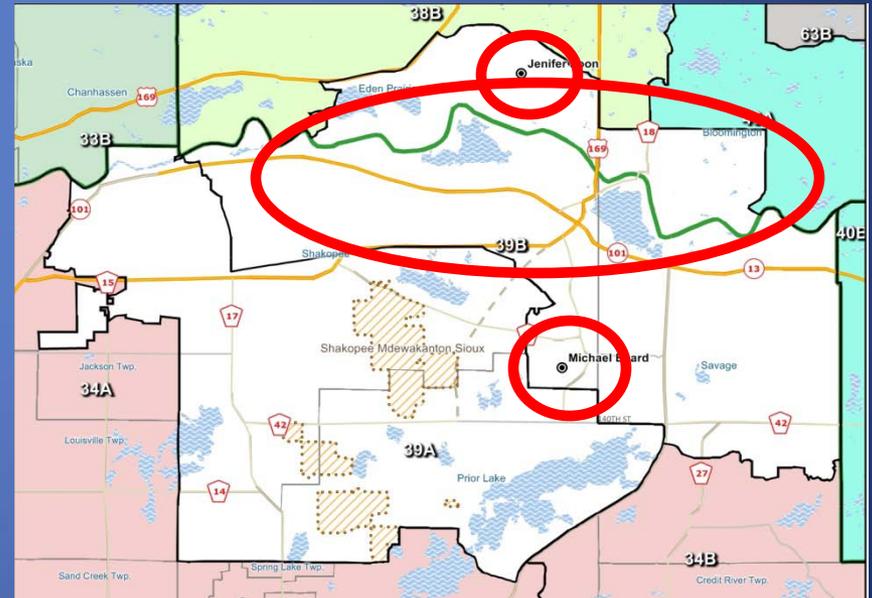
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 53A (Shakopee area)



- Does not split political subdivisions
- Uses river as natural border

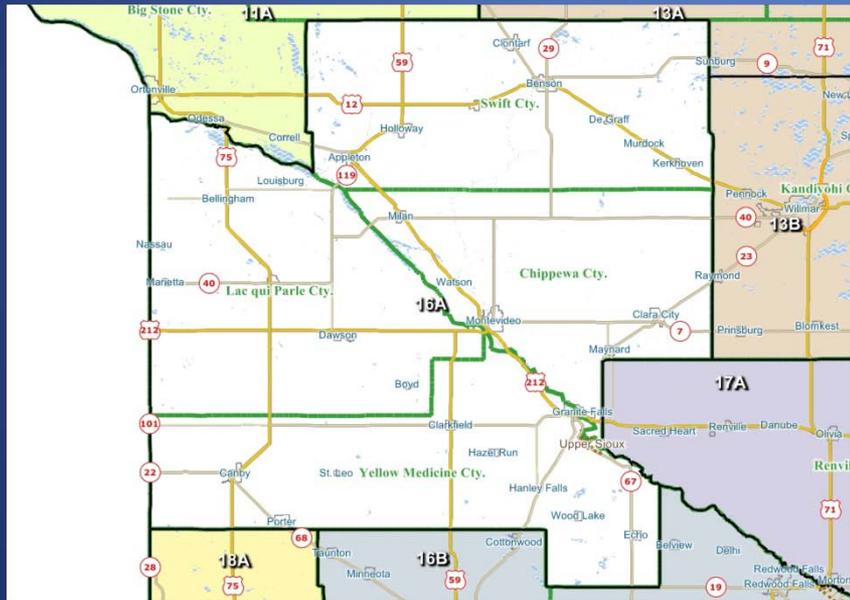
Martin House District 39B (Shakopee, Savage, Eden Prairie area)



- Splits political subdivisions
- Crosses river to create a pairing

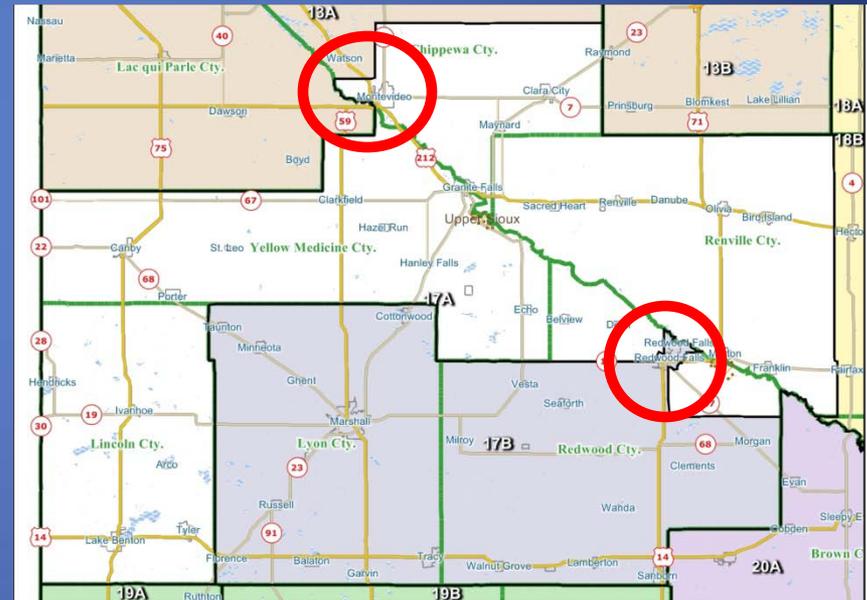
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 16A (West central Minnesota)



- Does not split political subdivisions
- Groups similar communities

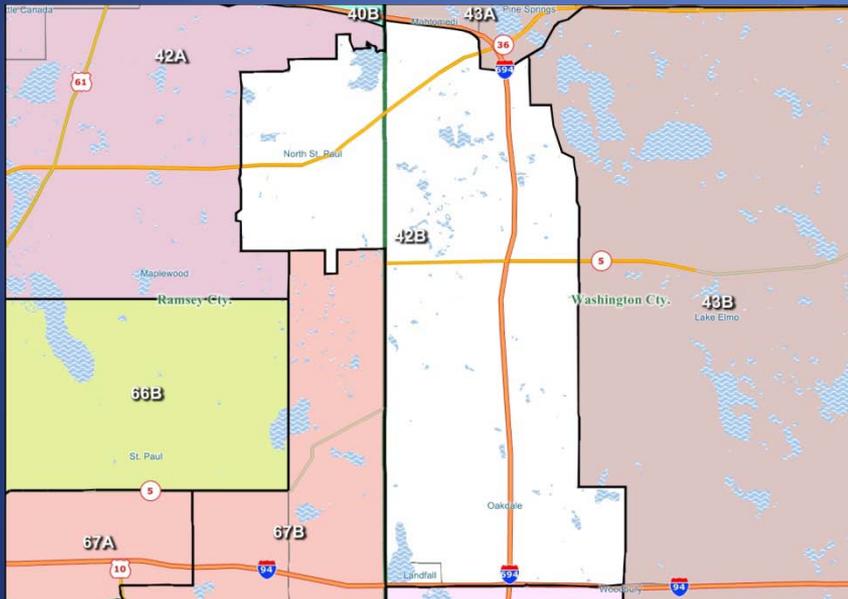
Martin House District 17A (West central Minnesota)



- Is not convenient or compact
- Splits political subdivisions
- Includes odd carve-outs

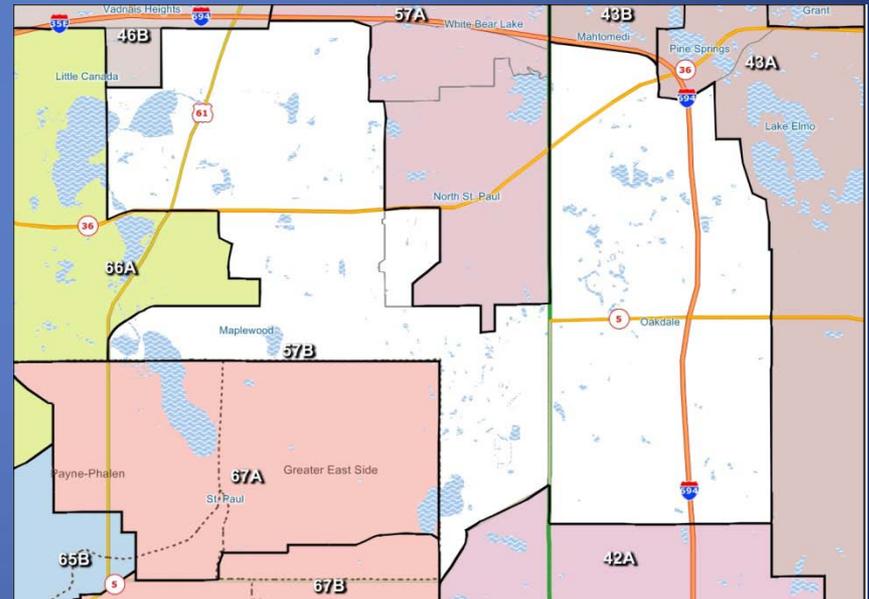
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 42B (North St. Paul, Oakdale area)



- Does not split political subdivisions
- Groups similar communities

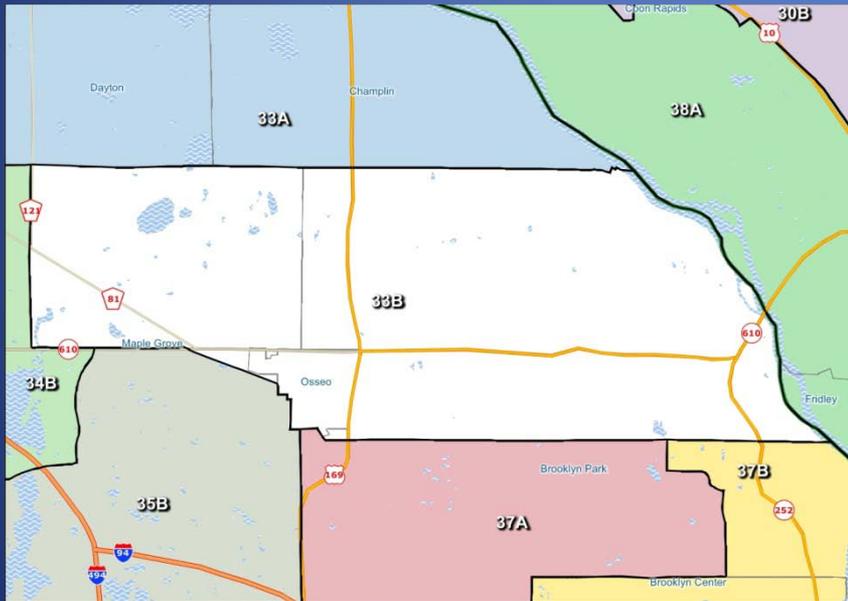
Britton House District 57B (Maplewood, North St. Paul, Oakdale)



- Is not convenient or compact
- Splits political subdivisions
- Is barely contiguous

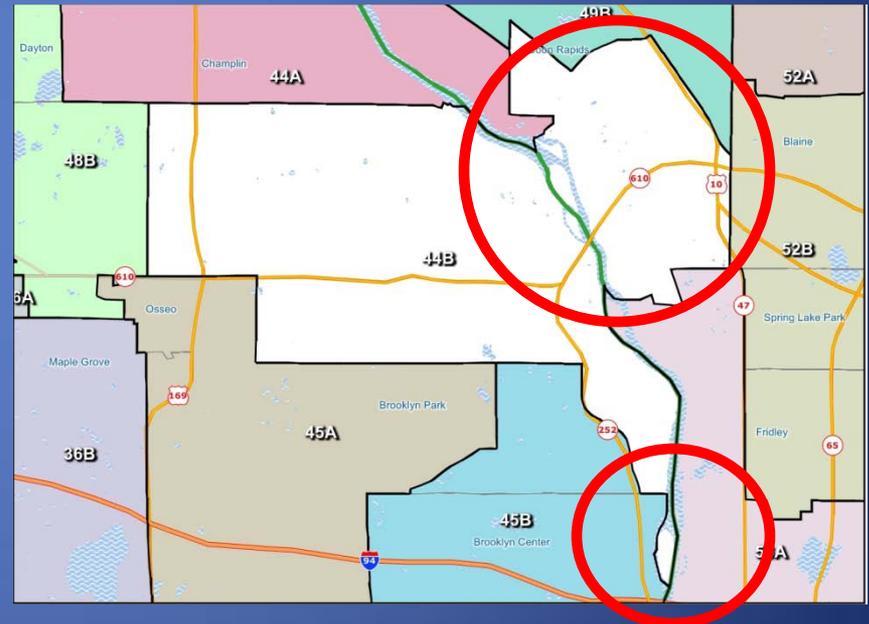
Plaintiffs' Principled Approach Results in Better Districts

Hippert House District 33B (Osseo, Brooklyn Park area)



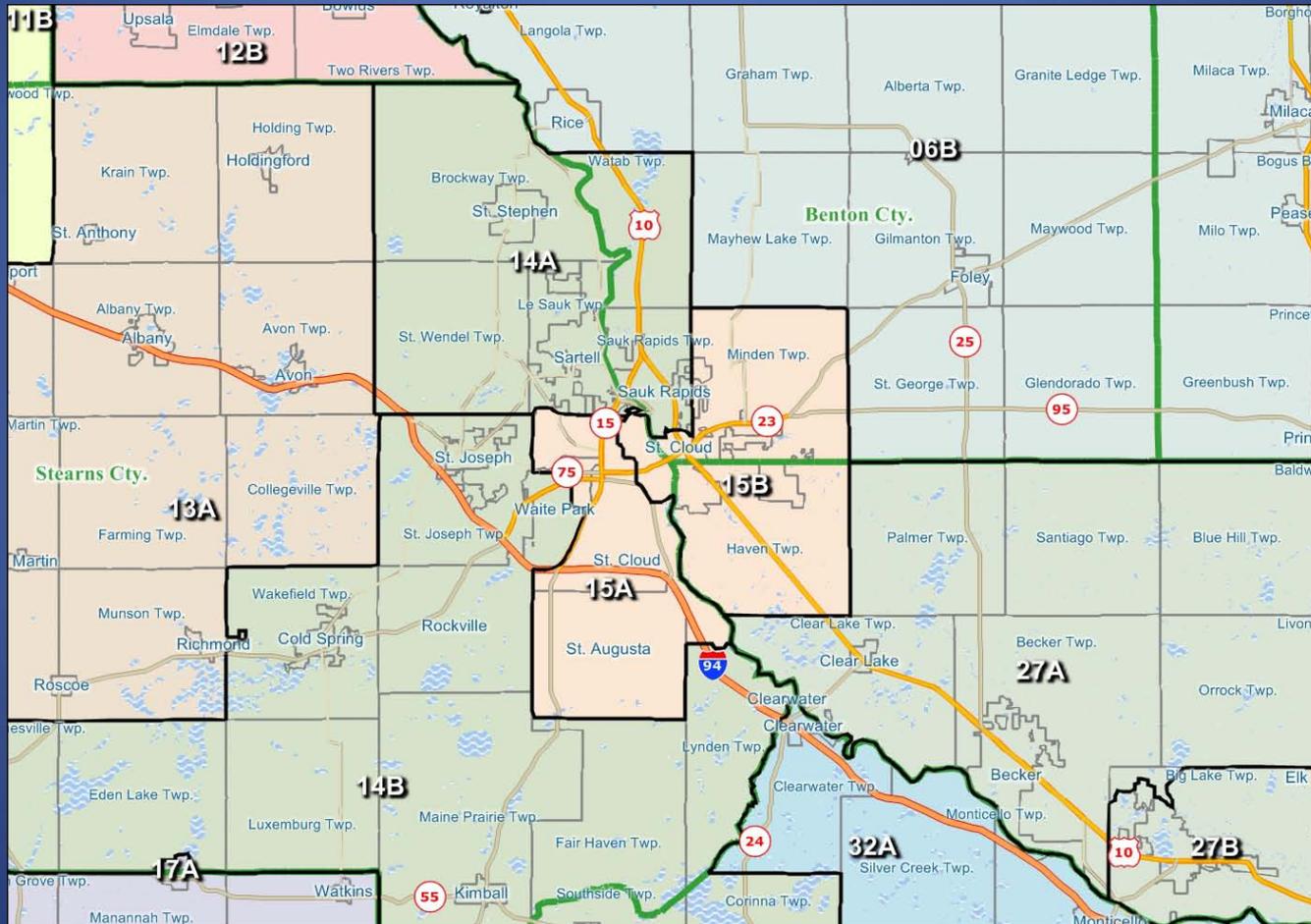
- Groups similar cities together
- Uses the river as a natural border

Martin House District 44B (Brooklyn Park, Coon Rapids area)

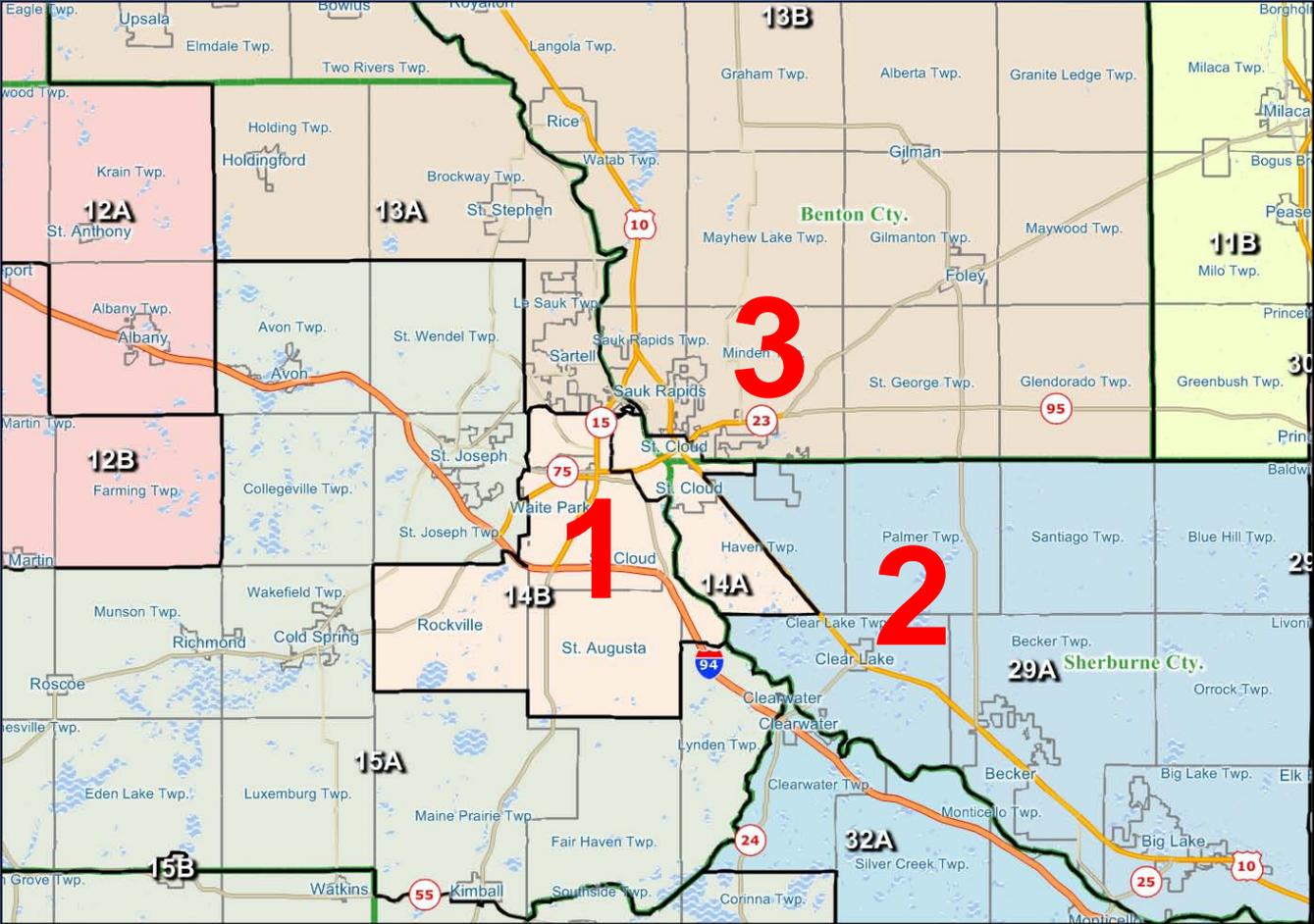


- Is not convenient or compact
- Crosses the river needlessly
- Is barely contiguous

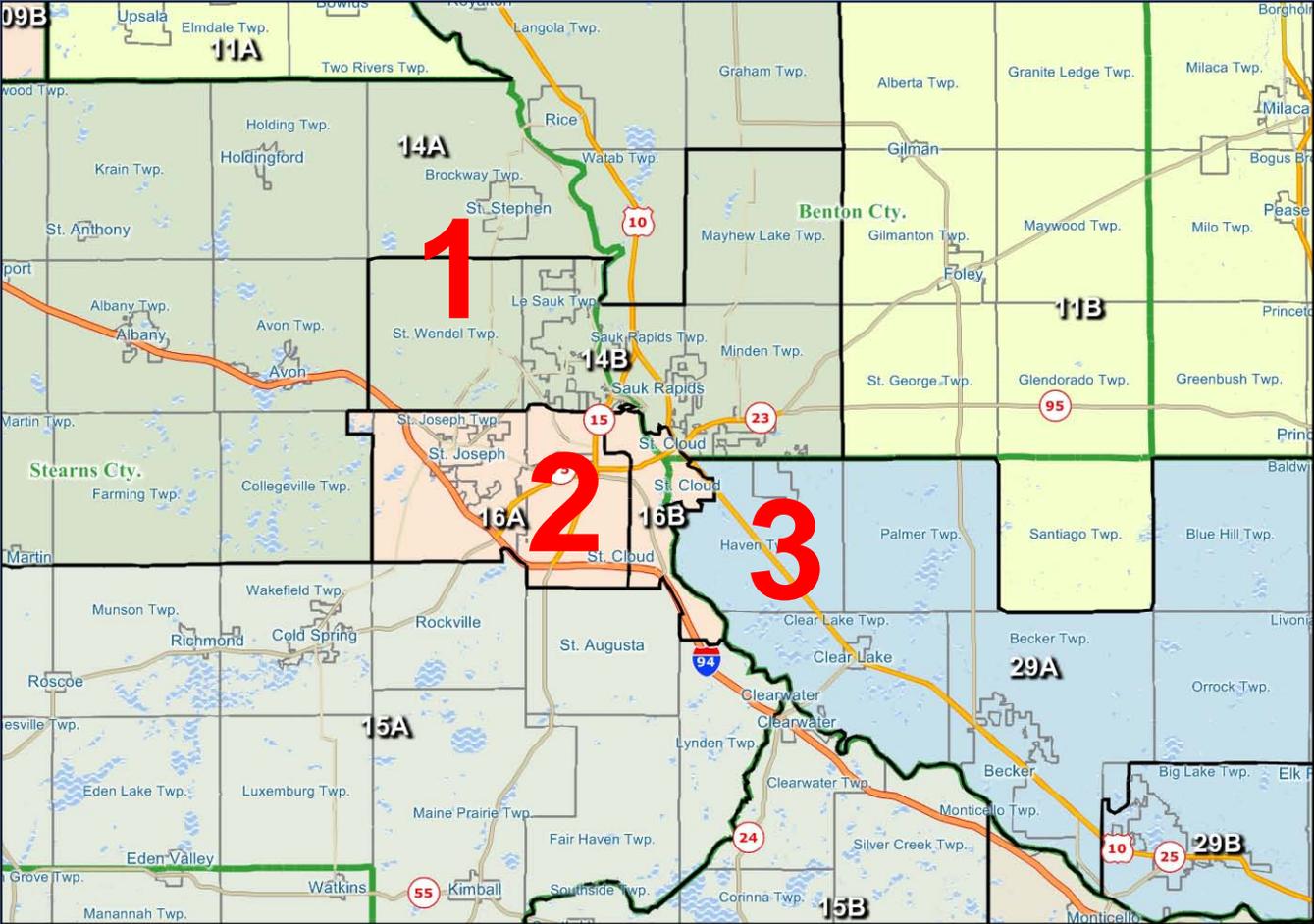
Plaintiffs' Plan Keeps St. Cloud in a Single Senate District



The Britton Intervenorors Divide St. Cloud Into 3 Senate Districts



The Martin Intervenors Divide St. Cloud Into 3 Senate Districts



Plaintiffs' Plan Minimizes Neighborhood Splits

	Hippert House Districts	Martin House Districts	Britton House Districts
Minneapolis Neighborhood Splits	8	12	22
St. Paul Planning District Splits	4	8	9
Duluth Neighborhood Splits	3	6	4

The Intervenors Ignored the Panel's Criterion Regarding Incumbents

	Hippert House and Senate Districts	Martin House and Senate Districts	Britton House and Senate Districts
Number of Incumbents Paired	20	48	57
Number of Open Seats	11	26	30
DFL vs. DFL Pairings	4	0	6
GOP vs. GOP Pairings	1	15	16
DFL vs. GOP Pairings	5	8	6

Advantages of Plaintiffs' Legislative Map

- Follows the Panel's criteria and objective principles
- Achieves near-population equality
- Minimizes political subdivision splits
- Follows natural geography
- Preserves neighborhoods and other communities of interest

Overall, Plaintiffs' Redistricting Plans:

- Comply with the Panel's criteria;
- Split fewer political subdivisions than any other plan;
- Effectuate legitimate state policies; and
- Are based on objective, identifiable factors.

Questions