

Plaintiffs Sara Hippert *et al.*

Argument in Opposition to  
Intervenors' Proposed Redistricting  
Plans

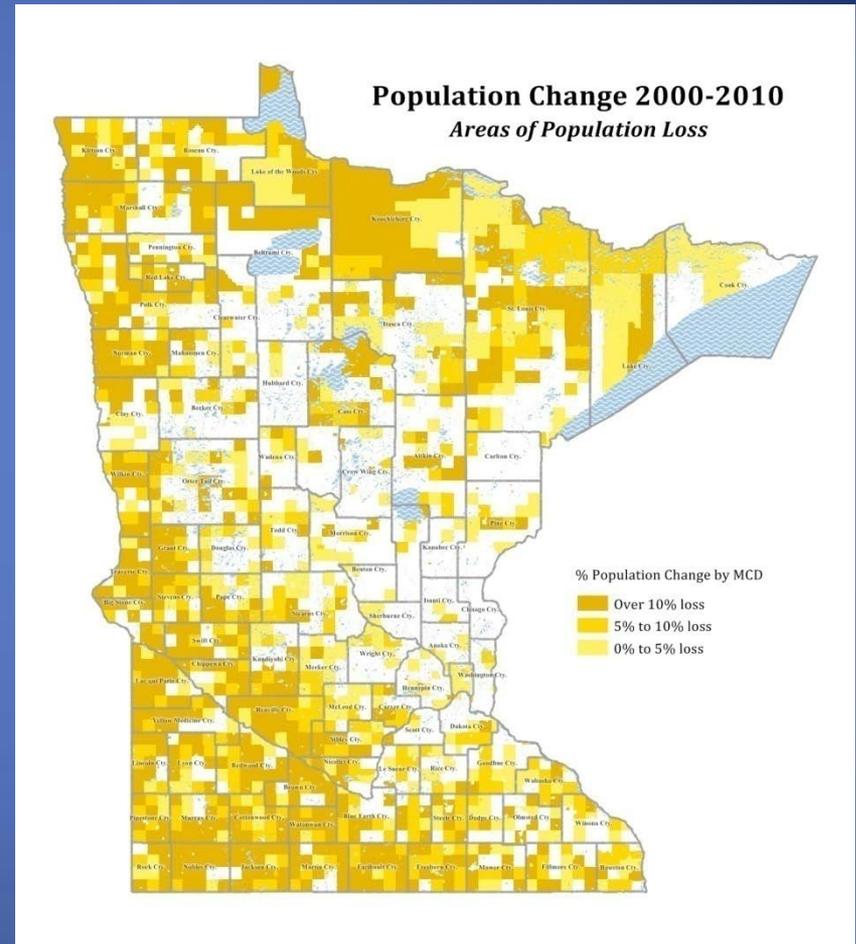
# Redistricting Plans Must Be Objective and Follow the Panel's Criteria

- Plaintiffs' plans follow the Panel's criteria and represent a more objective, principled approach to redistricting.
- Intervenors' plans are *ad hoc* and do not follow the Panel's criteria.

# Congressional Plans

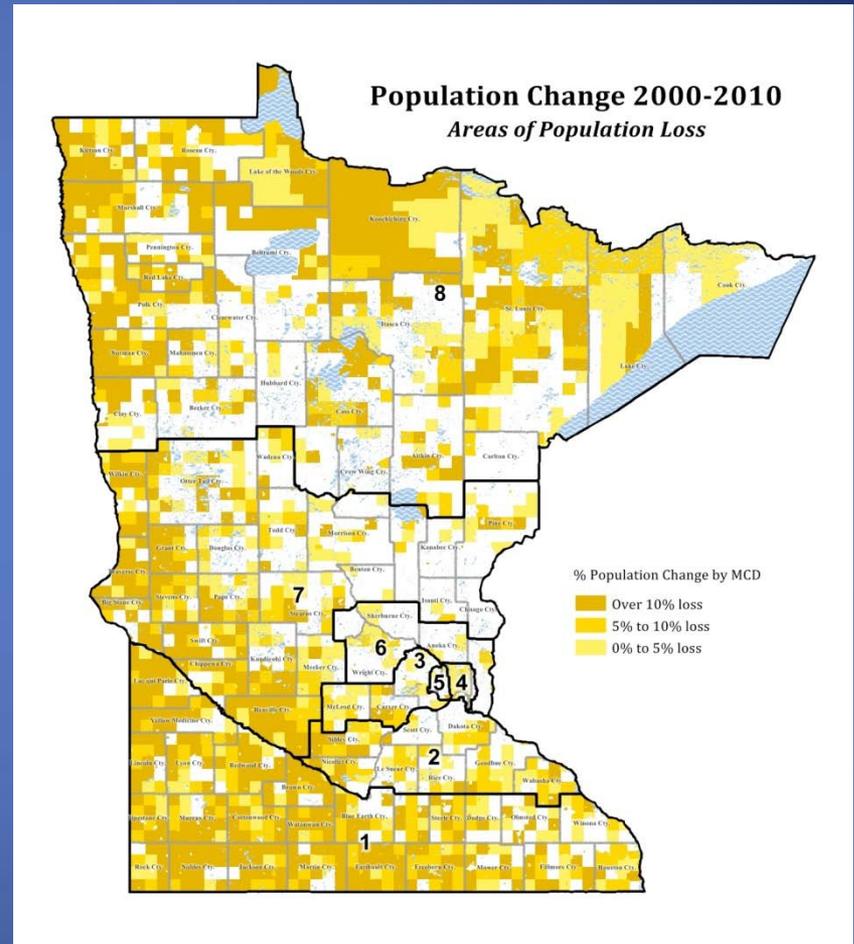
# Minnesota's Population

- Requires a 3-3-2 configuration
- Population losses in out-state areas require significant changes
- The Hippert plan addresses the state's changing population



# Minnesota's Population

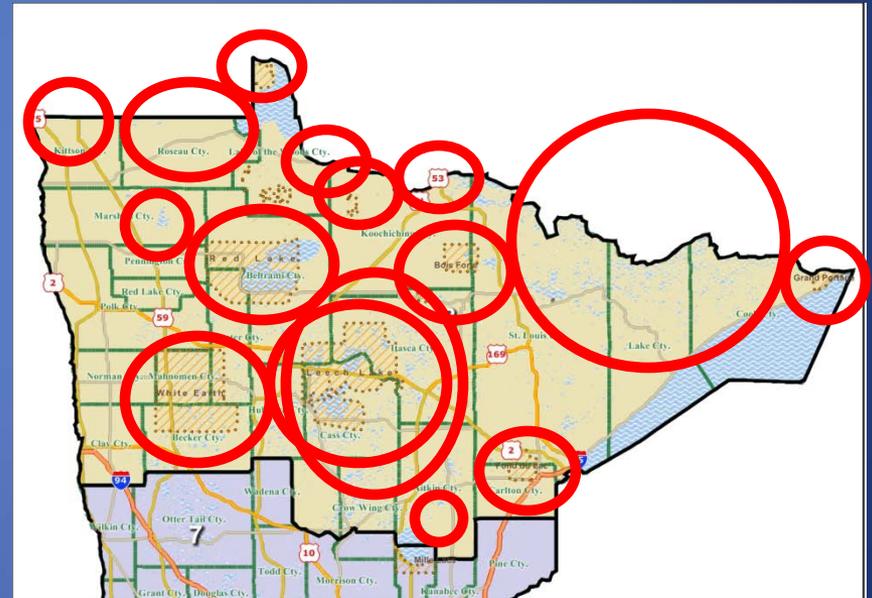
- Requires a 3-3-2 configuration
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# Plaintiffs' 8<sup>th</sup> District Better Protects Northern Minnesota

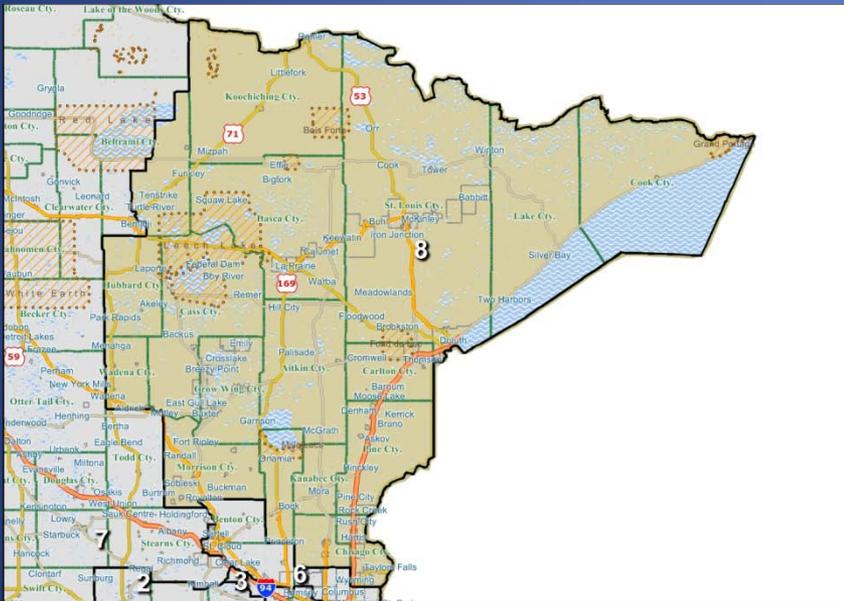
## Hippert 8<sup>th</sup> District

- Plaintiffs' 8<sup>th</sup> district preserves communities of interest created by:
  - Tribal Lands
  - Federal Lands
  - International Border
- Plaintiffs' 8<sup>th</sup> district preserves the unique “Up North” character of the region



# Intervenors' 8<sup>th</sup> Districts Do Not Address These Interests

## Britton 8<sup>th</sup> District



## Martin 8<sup>th</sup> District

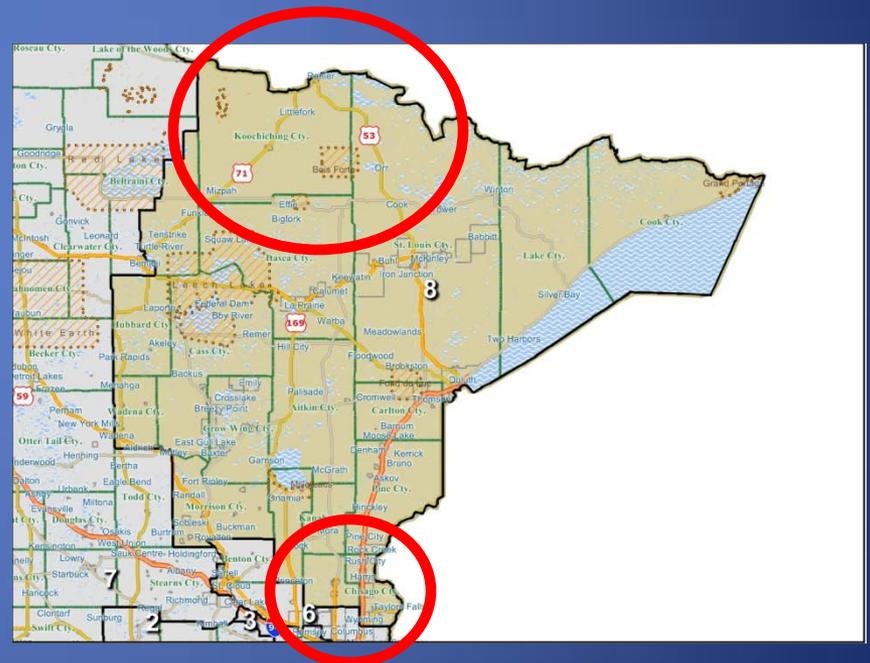


- Both districts divide tribal areas in Northern Minnesota
- Both districts divide federal lands in Northern Minnesota
- Both districts divide the communities of interest created by the Canadian border

# The Britton 8<sup>th</sup> District

## Britton 8<sup>th</sup> District

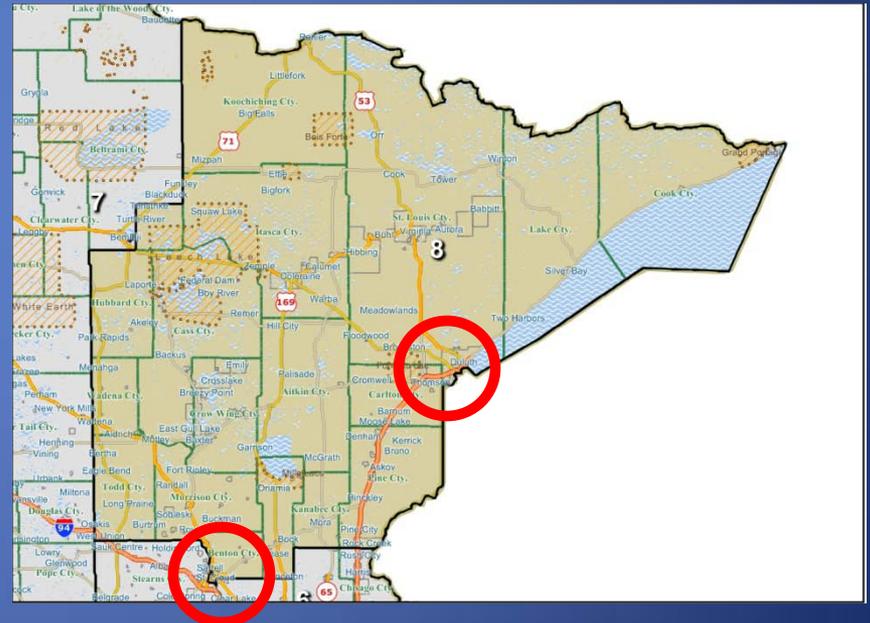
- The Britton 8<sup>th</sup> district combines far northern Minnesota with Isanti and Chisago counties in the 11-county metro area



# The Martin 8<sup>th</sup> District

- The Martin 8<sup>th</sup> district combines St. Cloud and Duluth in a single district

## Martin 8<sup>th</sup> District

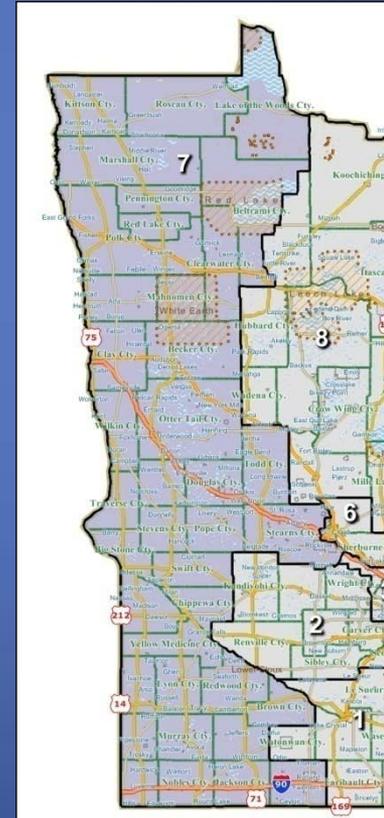


# Intervenors Propose Similar, Unworkable 7<sup>th</sup> Districts

Martin Proposed 7<sup>th</sup> District

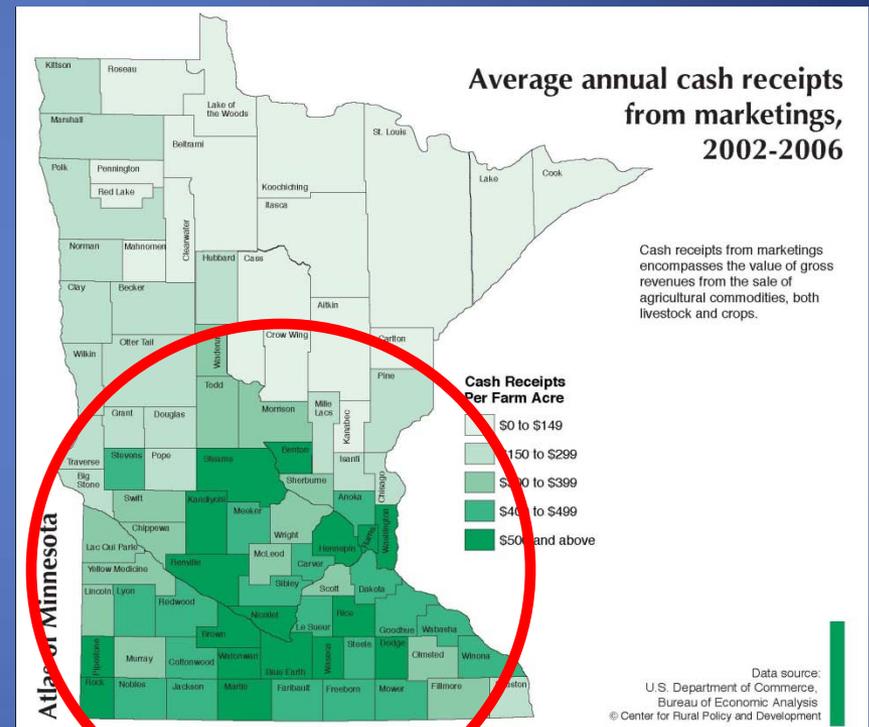


Britton Proposed 7<sup>th</sup> District



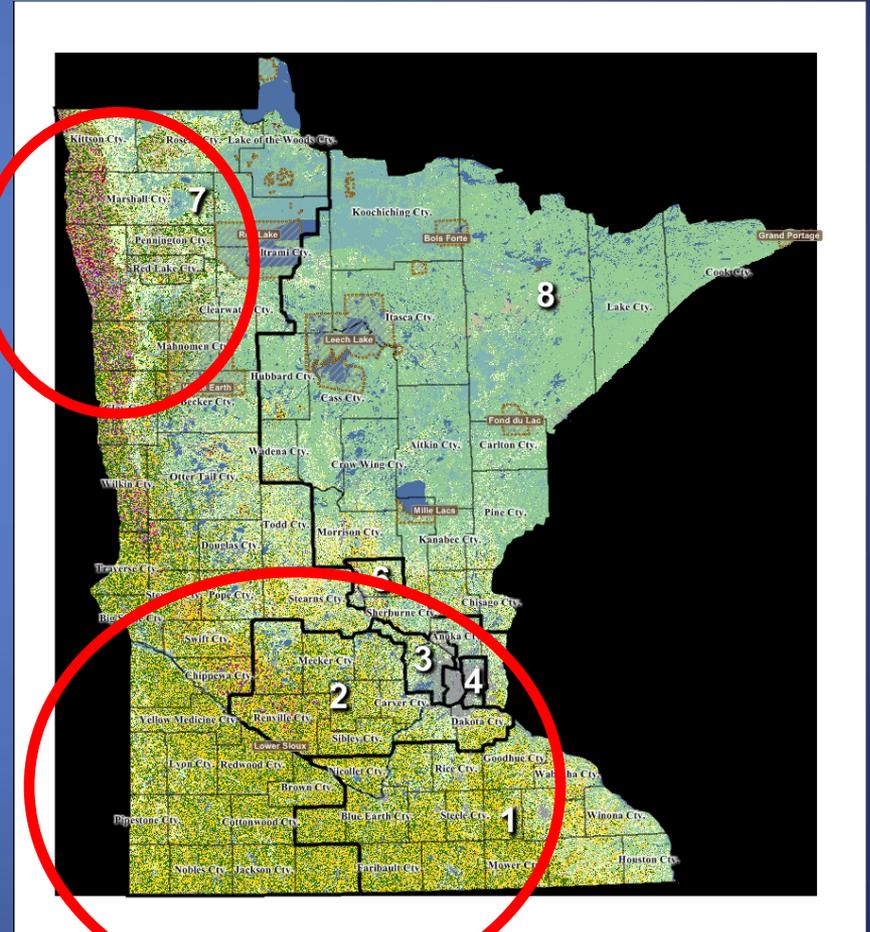
# Agricultural Interests Are Not Focused Only in the Western Part of the State

- Similar agricultural interests are predominantly located in Central and Southern Minnesota
- Intervenor's Plans needlessly divide these communities



# The Agriculture in Northwest MN is Different than Southwest MN

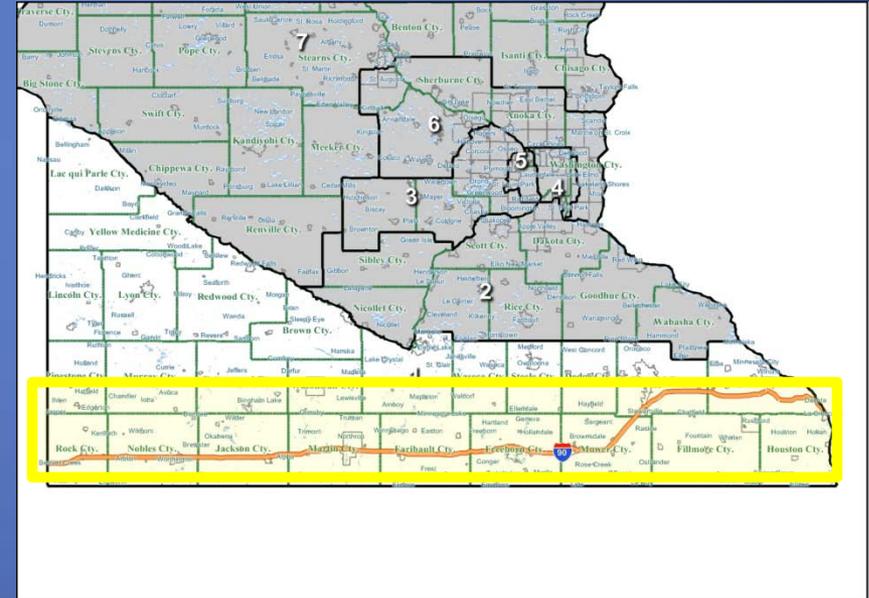
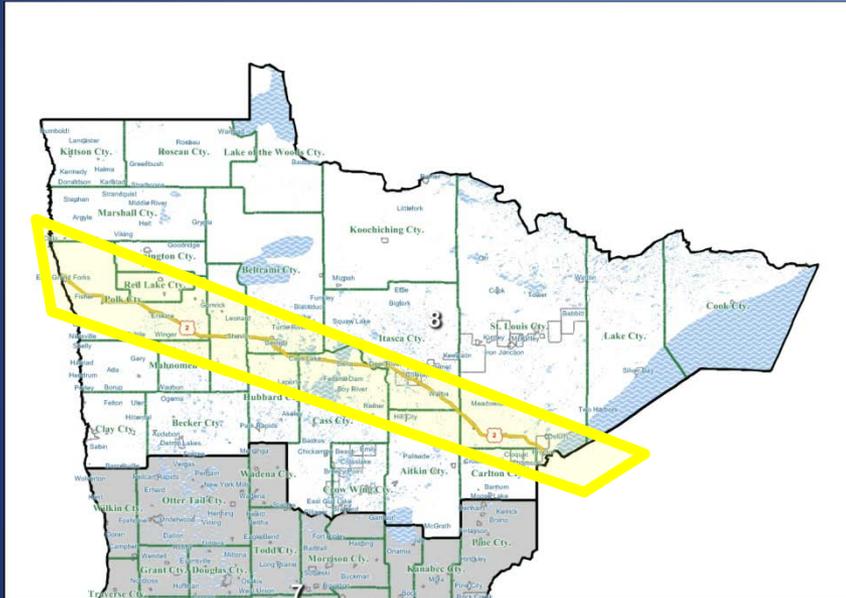
- The agriculture in northwestern Minnesota is primarily sugar beets
- The agriculture in southern Minnesota is primarily corn and soy beans



# A North-South 7<sup>th</sup> District Is Not Well Connected Like Plaintiffs' Districts

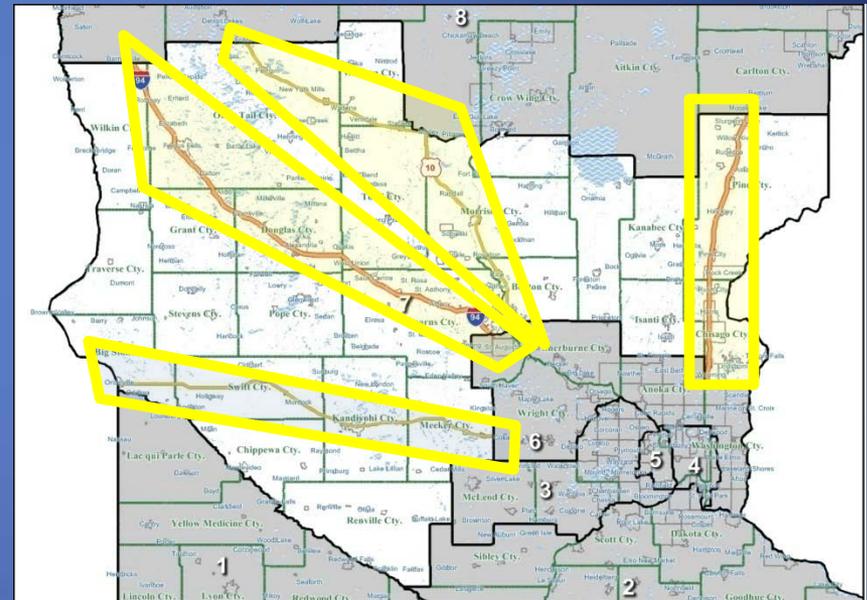
Plaintiffs' 8<sup>th</sup> District Features Highway 2

Plaintiffs' 1<sup>st</sup> District Features Interstate 90



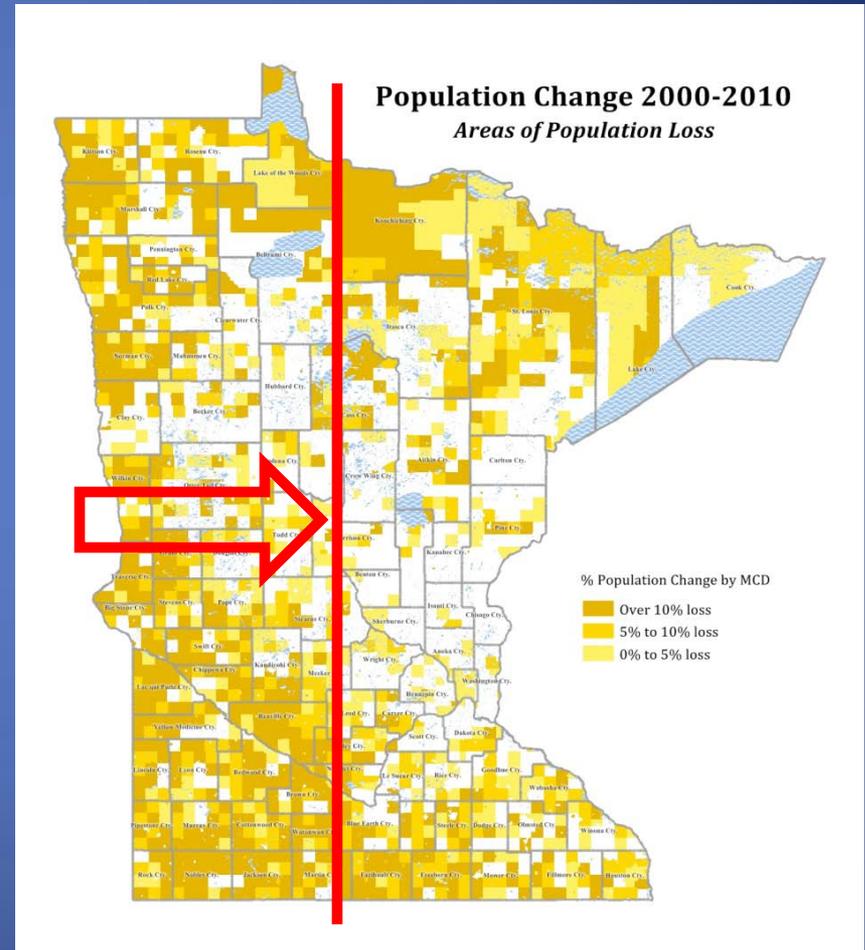
# A North-South 7<sup>th</sup> District Is Not Well Connected Like Plaintiffs' Districts

- Plaintiffs' 7<sup>th</sup> District is connected by Interstate 35, Interstate 94, Highway 10, and Highway 12



# Western Minnesota Is Losing Population Quickly

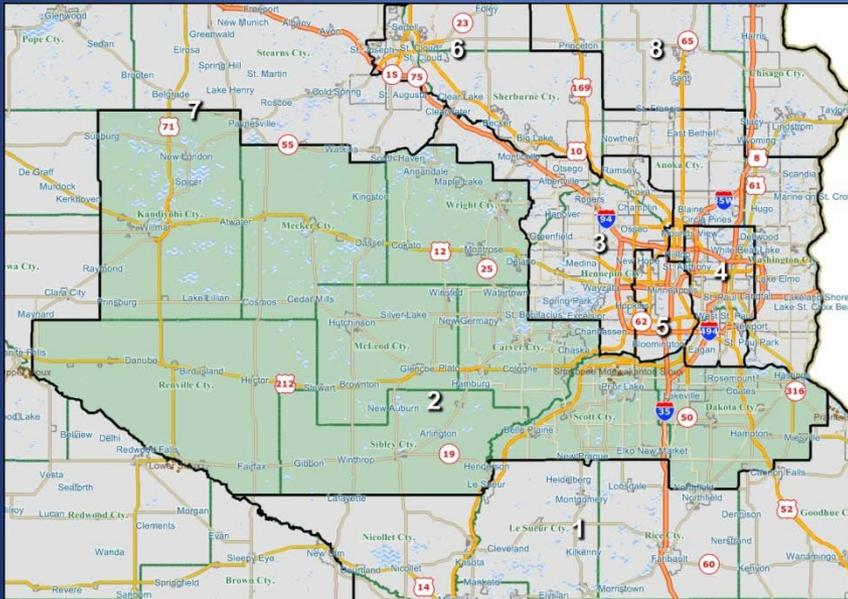
- Intervenors' Proposed North-South 7<sup>th</sup> District is rapidly losing population and these losses will continue
- A North-South 7<sup>th</sup> district will soon cover half of the state
- A North-South 7<sup>th</sup> district will eventually merge northwest and northeast Minnesota





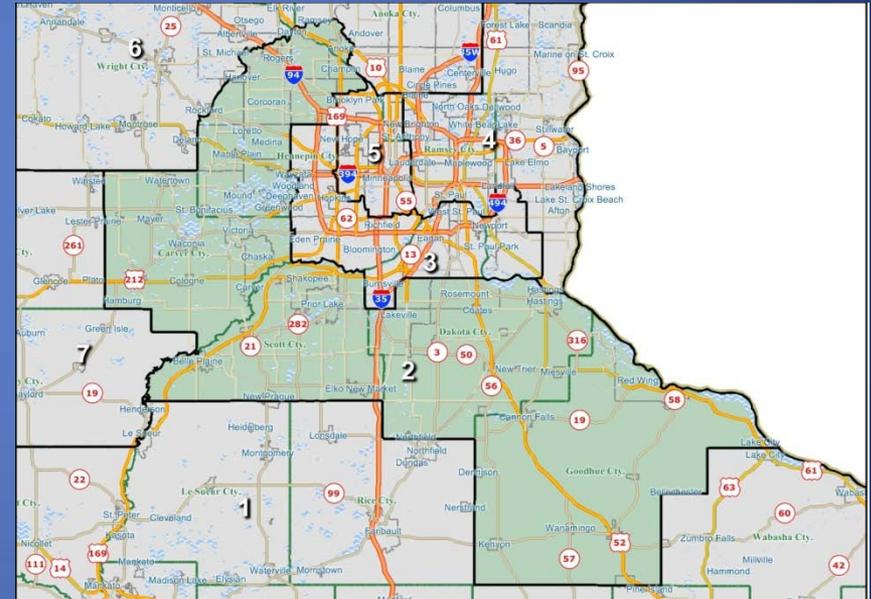
# Intervenors Rural Districts Lead To Odd Districts in the Metro

## Britton 2<sup>nd</sup> District



- Combines south metro counties with rural counties in West Central Minnesota

## Martin 2<sup>nd</sup> District

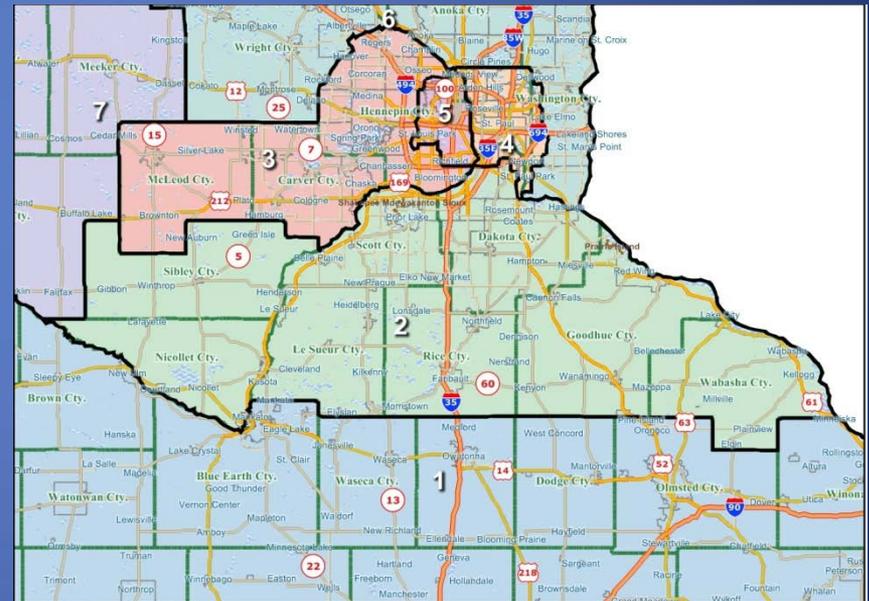


- Combines the northwest metro area with Goodhue County

# Plaintiffs' 2<sup>nd</sup> District is More Sensible

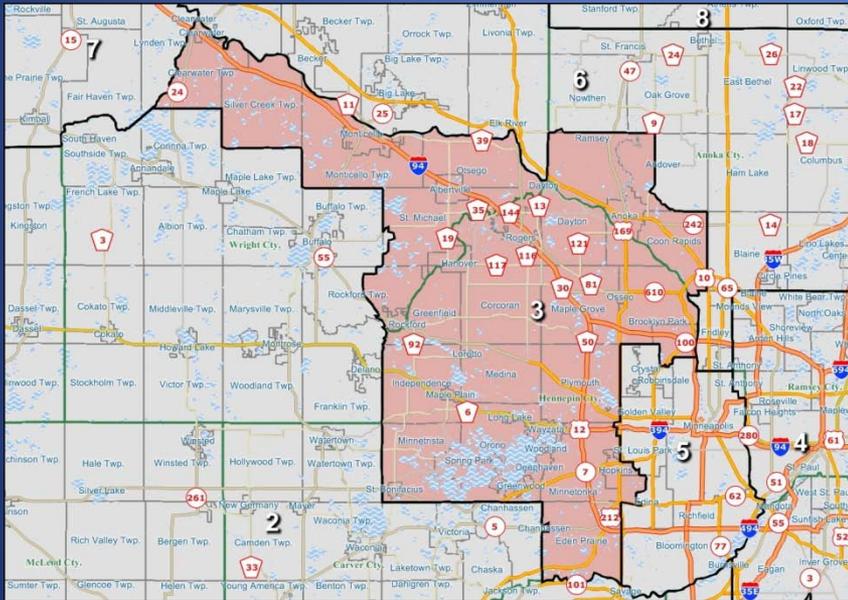
## Hippert 2<sup>nd</sup> District

- Plaintiffs' 2<sup>nd</sup> district is a logical “South of the River” district
- Plaintiffs' 2<sup>nd</sup> district is similar to the existing *Zachman* 2<sup>nd</sup> district
- Plaintiffs' 2<sup>nd</sup> district is more compact than the Intervenor's proposals



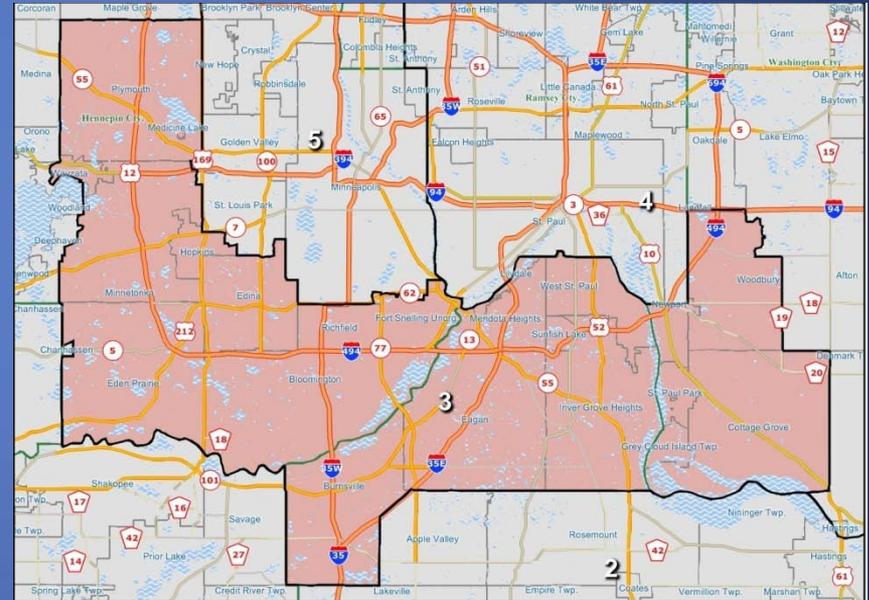
# Intervenors' Suburban Districts Are Il-Conceived

## Britton 3<sup>rd</sup> District



- The narrow, snake-like corridor in the northwest does not serve any legitimate interests

## Martin 3<sup>rd</sup> District

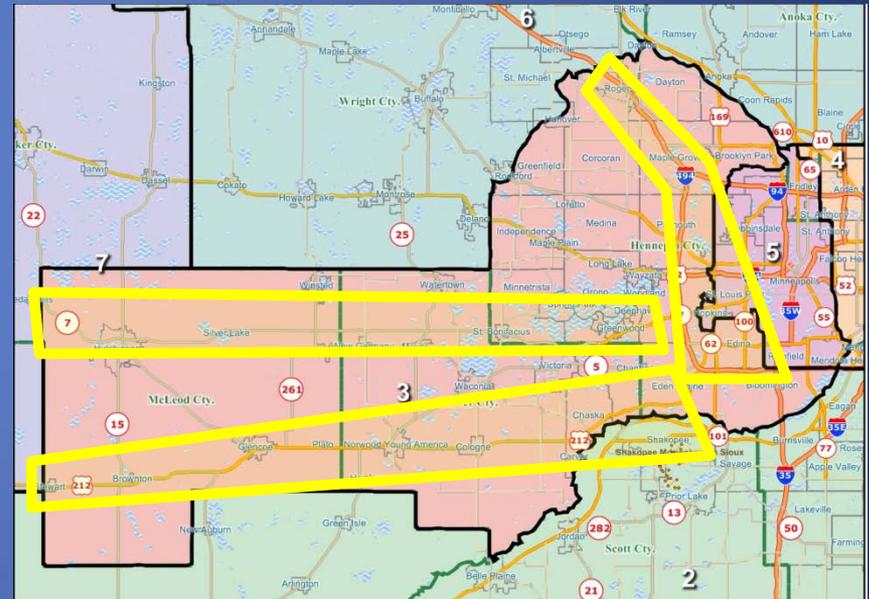


- Illogically combines areas in the west metro, like Plymouth, with areas in the southeast metro, like Cottage Grove

# Plaintiffs' 3<sup>rd</sup> District Is More Sensible

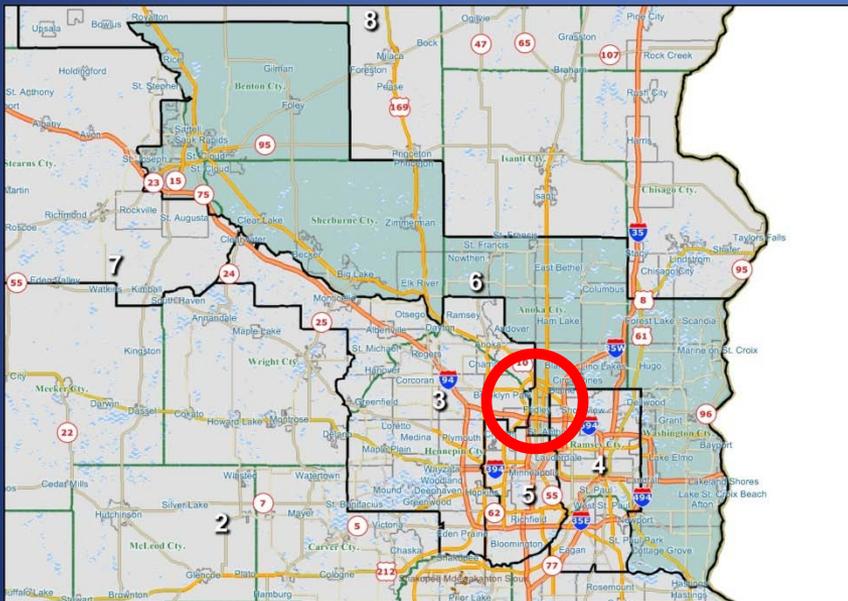
## Hippert 3<sup>rd</sup> District

- Plaintiffs' 3<sup>rd</sup> district follows county borders and rivers
- Plaintiffs' 3<sup>rd</sup> district creates a more compact, logical district
- Well connected by Highways 7 and 212 and Interstate 494



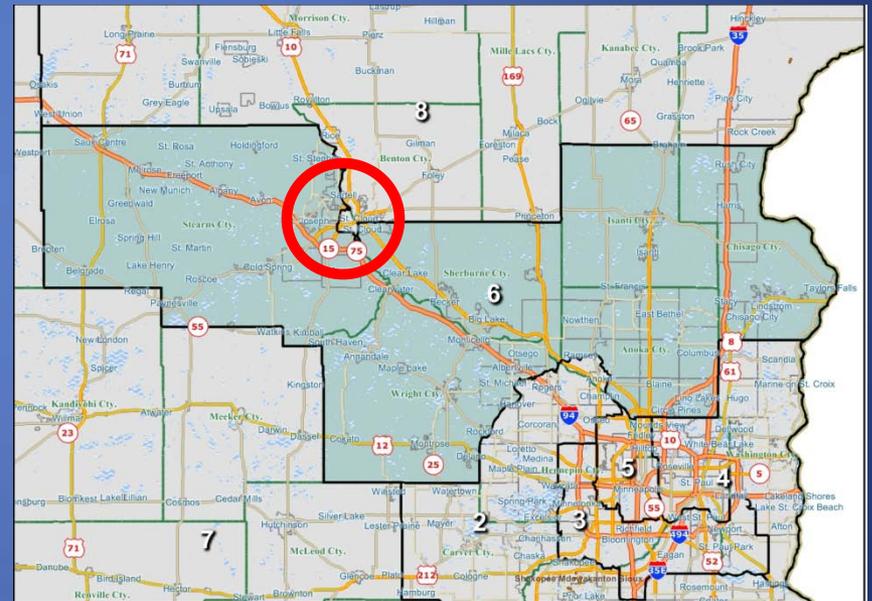
# Intervenors' Suburban Districts Are Ill-Conceived

## Britton 6<sup>th</sup> District



- Including Fridley and Columbia Heights in the 6<sup>th</sup> district dilutes the minority population in the 5<sup>th</sup> district

## Martin 6<sup>th</sup> District

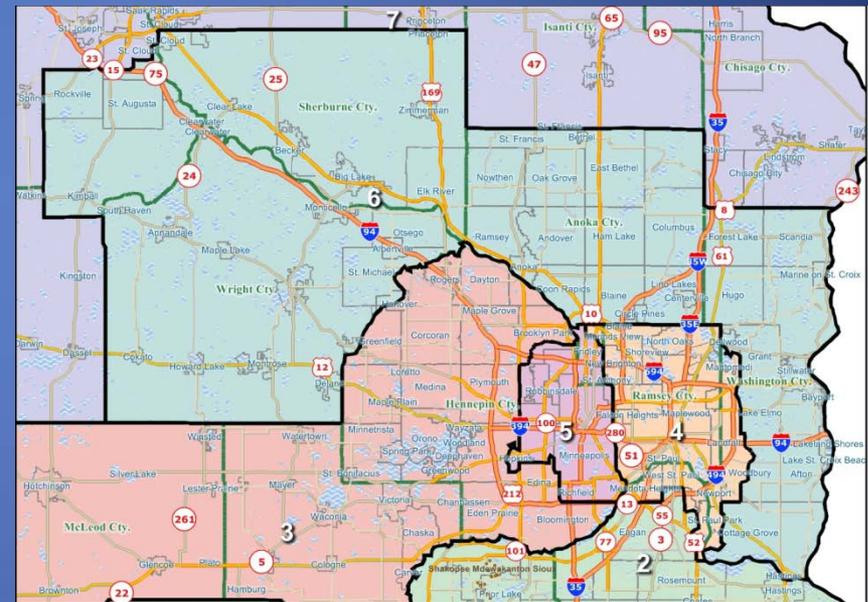


- Plays havoc with St. Cloud as a consequence of combining Ramsey and Washington counties in the 4<sup>th</sup> district

# Plaintiffs' 6<sup>th</sup> District is More Sensible

## Hippert 6<sup>th</sup> District

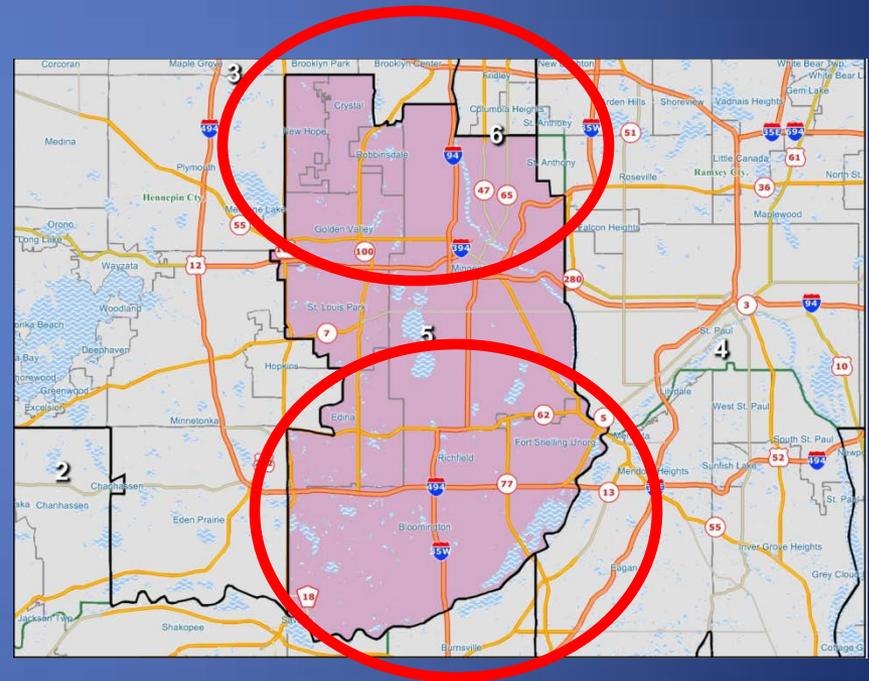
- Plaintiffs' 6<sup>th</sup> district is similar to the current *Zachman* 6<sup>th</sup> district
- Plaintiffs' 6<sup>th</sup> district consists mostly of metro-area suburban and exurban counties



# The Britton 5<sup>th</sup> District Dilutes Minority Representation

- The Britton plan is the only plan without a single minority opportunity district based on voting age population
- The Britton plan combines Minneapolis with Bloomington and Edina instead of more diverse and logical communities to the north of Minneapolis

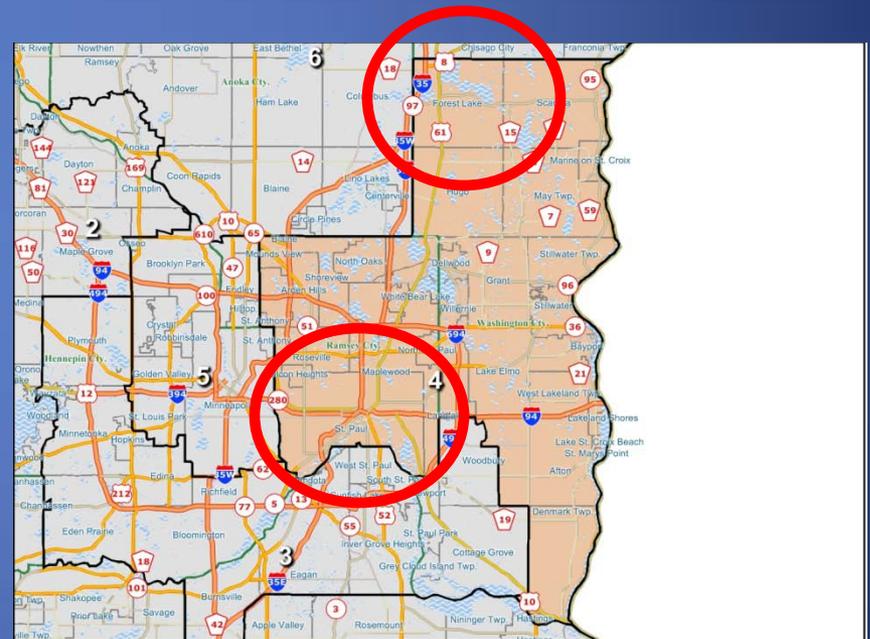
## Britton 5<sup>th</sup> District



# The Martin 4<sup>th</sup> District Illogically Pairs Urban and Exurban Communities

## Martin 4<sup>th</sup> District

- The Martin 4<sup>th</sup> district illogically combines St. Paul with third-ring suburbs and exurbs, like Forest Lake
- The Martin 4<sup>th</sup> District pairs the only two female Congresswomen from Minnesota



# Advantages of Plaintiffs' Congressional Plan

- Plaintiffs' plan addresses Minnesota's changing population today and in the future, particularly in rural Minnesota
- Plaintiffs' plan provides a true 3-3-2 configuration, giving full consideration to federal interests
- Plaintiffs' plan provides more compact, sensible districts, especially in the metro area

# Legislative Plans

# Legislative Plans Must Be Objective

- Redistricting plans must comply with the Panel's criteria.
- Legislative districts need to be based on rational, objective principles that the people of Minnesota will understand.
- Only the Hippert plan accomplishes these objectives.

# The Intervenor's Reject the Panel's Criteria

- The Martin Intervenor's argue that “[c]ounty boundaries in the Twin Cities do not generally define metropolitan area communities . . . .”
- They further argue that “communities in the Twin Cities are often created because of shared circumstances, concerns, or neighborhoods rather than city or county boundaries . . . .”

# The Intervenor's Reject the Panel's Criteria

- The Britton Intervenor's argue that "Minnesotans do not [choose] to live just within political subdivisions."
- They also argue that "blind adherence to municipal boundaries is a rationale for 'packing' . . . ."

# The Intervenor's Reject the Panel's Criteria

- The Martin Intervenor's house redistricting plan splits 69% more minor civil divisions than Plaintiffs' plan.
- The Britton Intervenor's house redistricting plan splits 120% more minor civil divisions than Plaintiffs' plan.

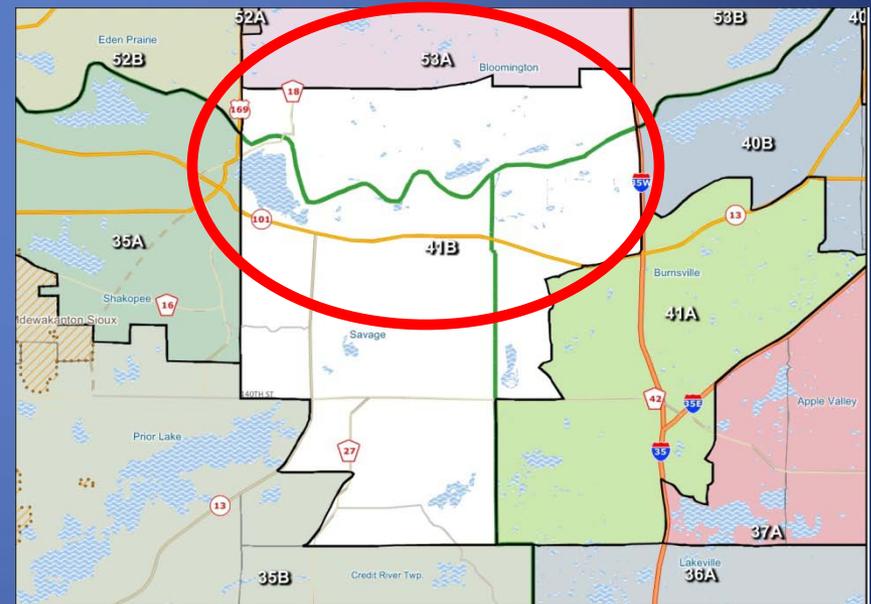
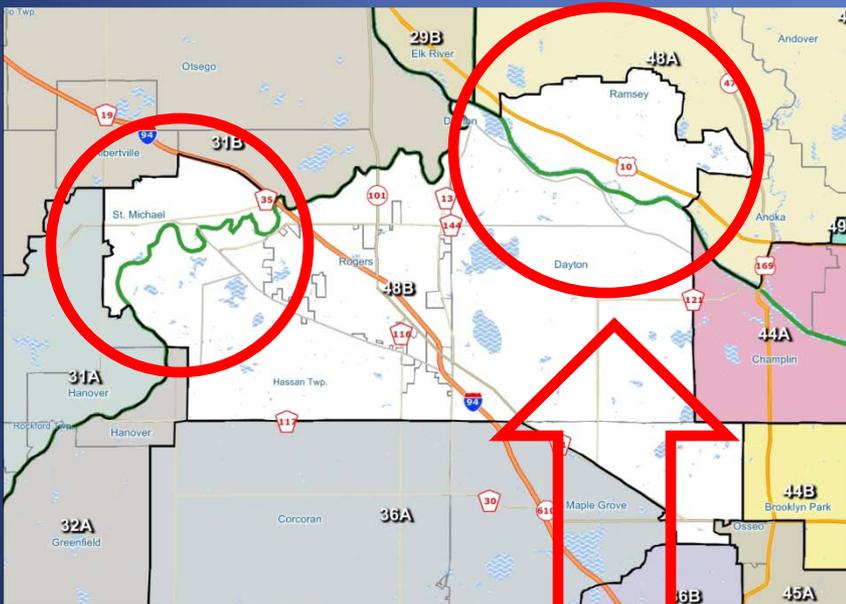
What Are the Reasons for So  
Many Political Subdivision Splits?

# The Intervenor Do Not Preserve Communities of Interest.

For example...

## Martin House District 48B

## Britton House District 41B



**NO BRIDGES**

# The Intervenors Do Not Preserve Communities of Interest.

For example...

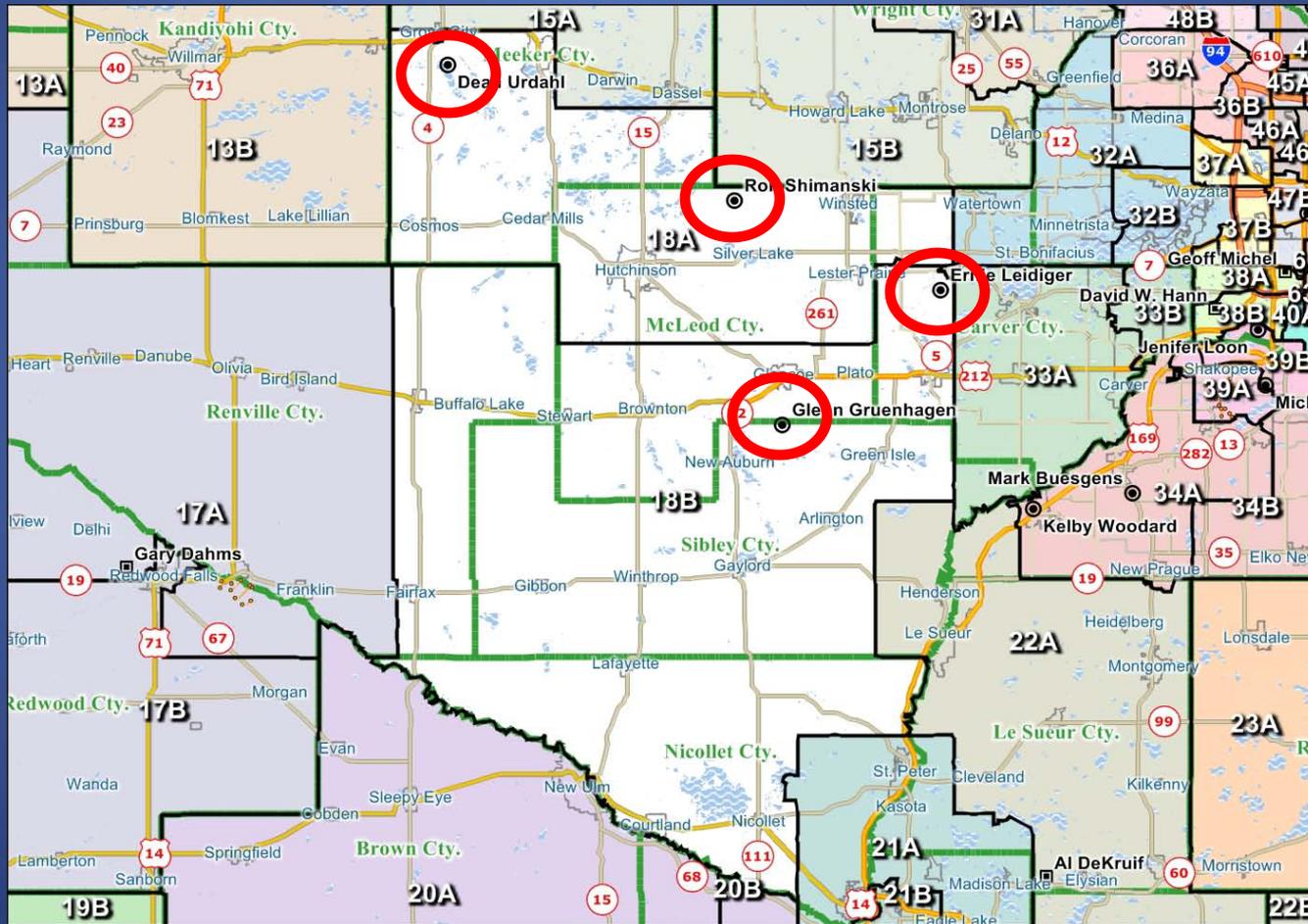
- The Martin Intervenors' house redistricting plan splits 50% more Minneapolis neighborhoods than Plaintiffs' plan.
- The Britton Intervenors' house redistricting plan splits 175% more Minneapolis neighborhoods than Plaintiffs' plan.

# Intervenors Go Out Of Their Way To Increase Partisan Pairings.

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

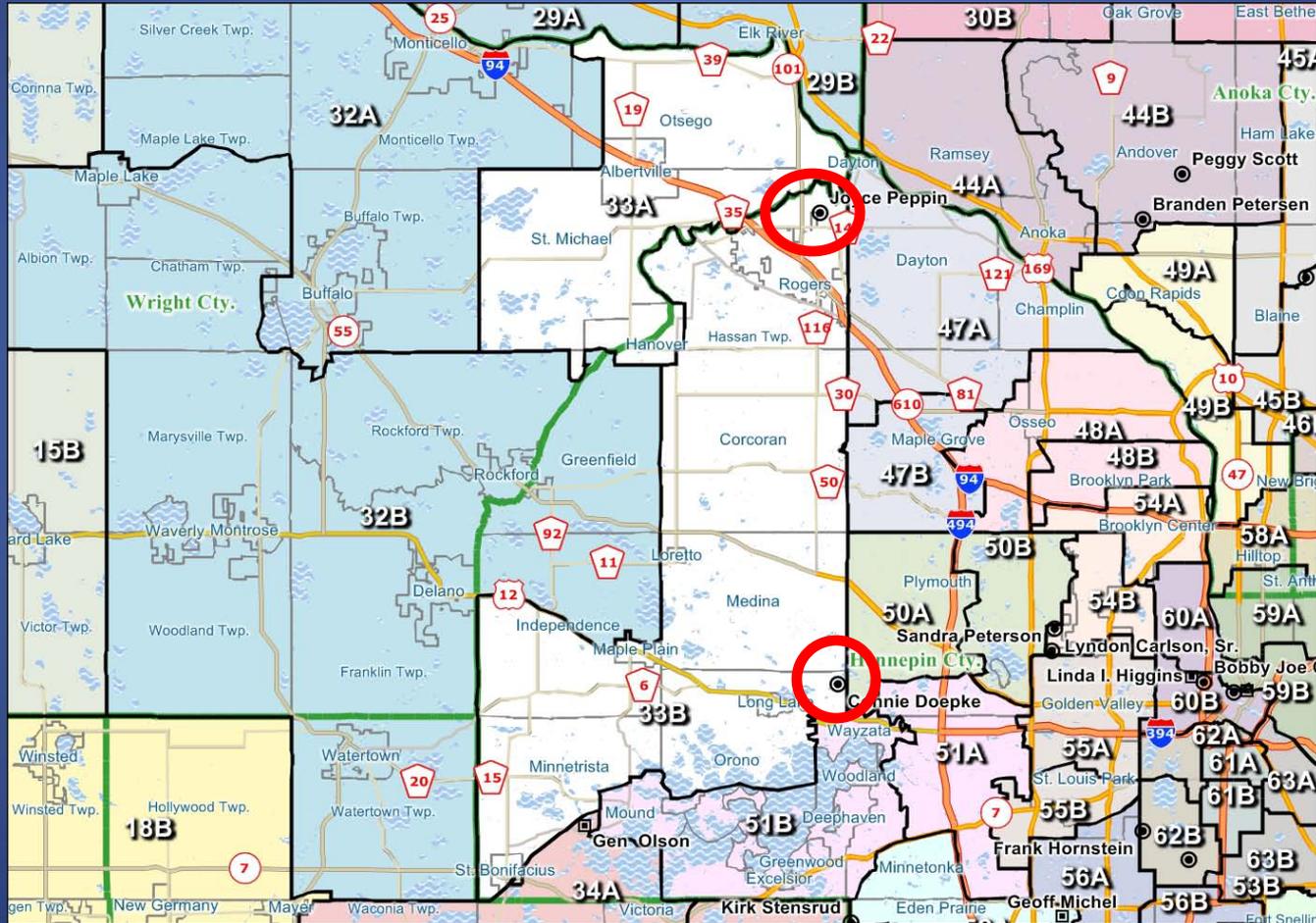
# Martin House Districts 18A and 18B

Pair 4 Republican Representatives



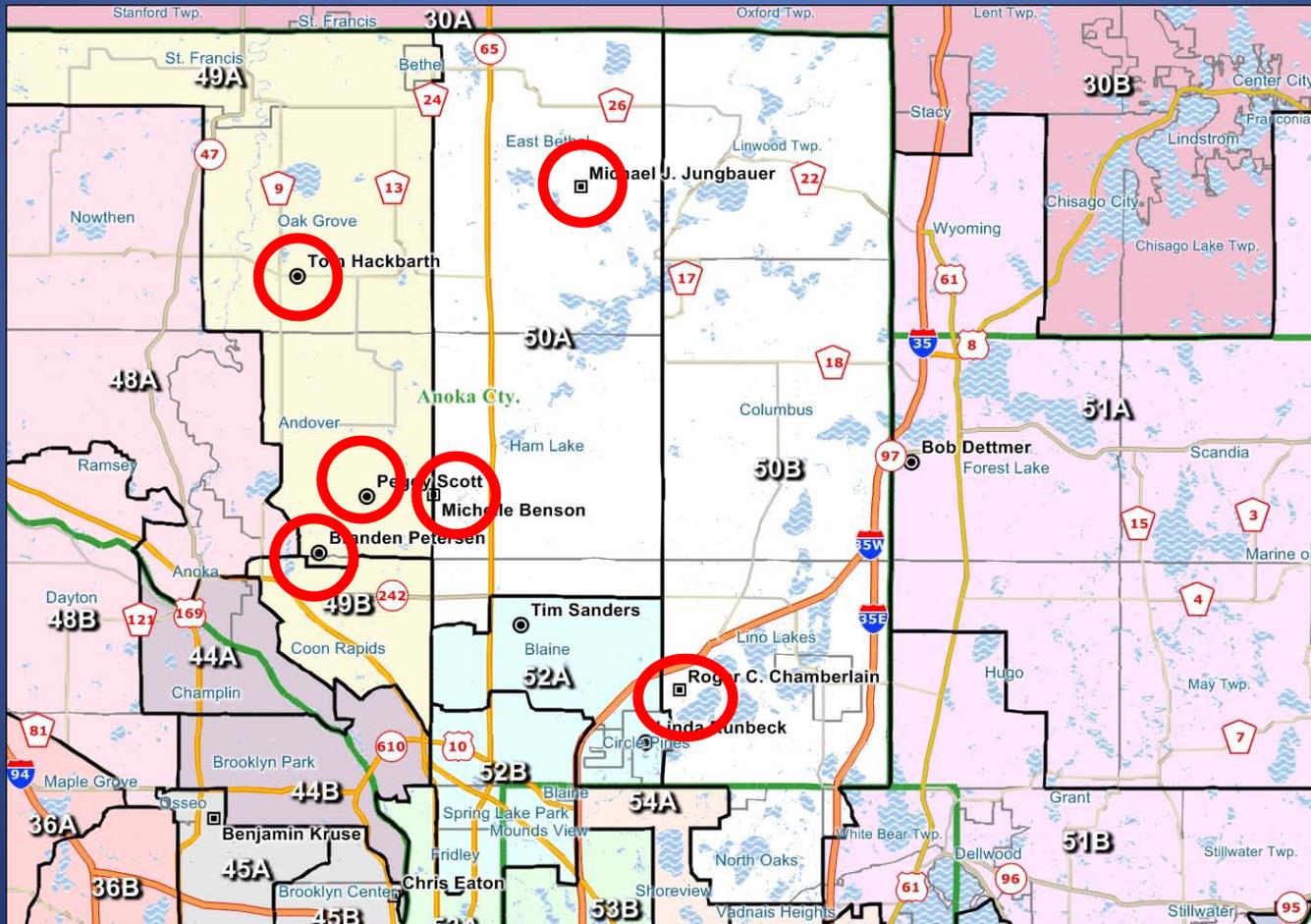
# Britton House District 33B

Pairs 2 Female Republican Representatives



# Martin House District 49A and Senate District 50

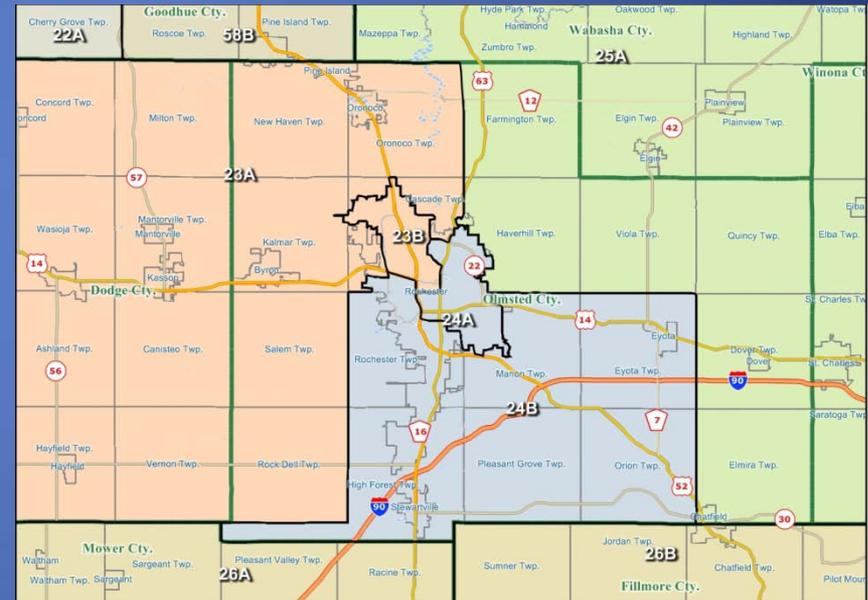
Pair 3 Republican Representatives and 3 Republican Senators



# Plaintiffs' Plan Better Addresses Out-State Cities, Like Rochester

## Hippert Rochester Area

- Plaintiffs' approach to Rochester is logical and simple
- The only counties that Plaintiffs' plan splits in southeastern Minnesota are Olmsted and Winona counties, which must be split for population reasons

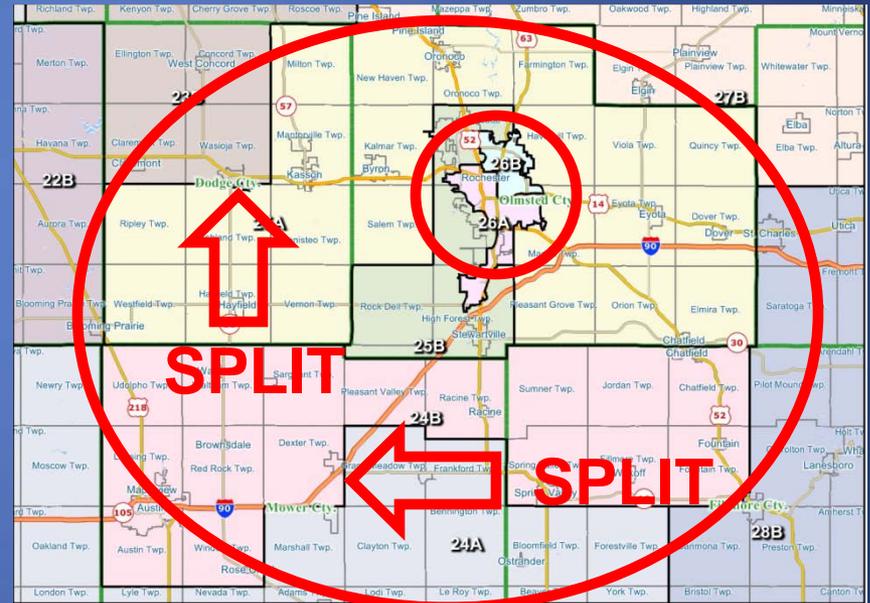


- The Hippert plan only splits 2 counties in southeast Minnesota

# Intervenors Create Odd, Inconvenient Districts Around Rochester

## Martin Rochester Area

- The Martin Intervenors create donut districts around Rochester
- This creates numerous odd-shaped districts in southeastern Minnesota and splits in Olmsted, Dodge, Goodhue, Winona, Fillmore, and Mower counties

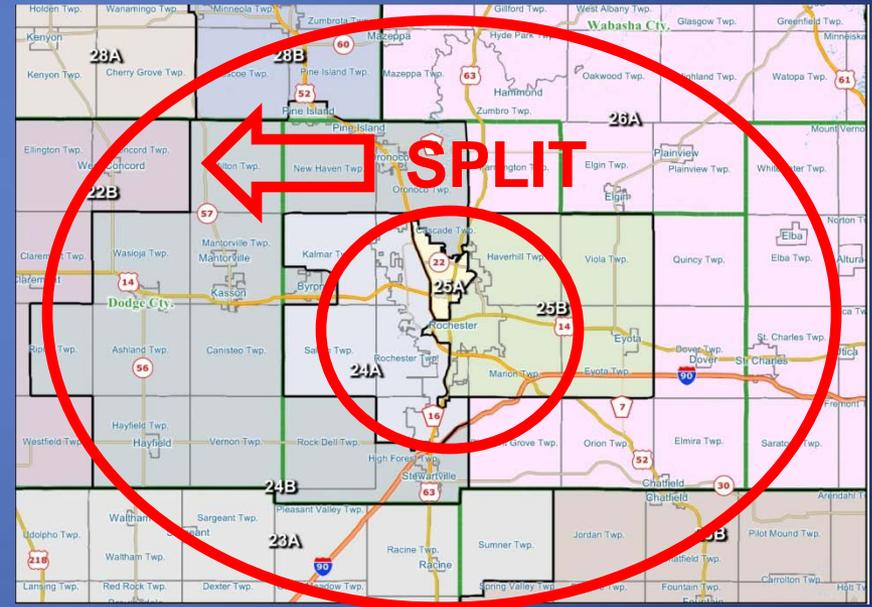


- The Martin Plan splits 6 counties in southeast Minnesota

# Intervenors Create Odd, Inconvenient Districts Around Rochester

## Britton Rochester Area

- The Britton Intervenors also create odd, semi-circle districts around Rochester
- Like the Martin Plan, this has adverse consequences for southeastern Minnesota, including splits in Olmsted, Dodge, Goodhue, Winona, and Fillmore counties



- The Britton Plan splits 5 counties in southeast Minnesota

# Advantages of Plaintiffs' Legislative Redistricting Plan

- Follows the Panel's criteria
- Is objective, logical, and explainable
- Preserves political subdivisions
- Uses rivers and major roads as district borders
- Preserves neighborhoods in the state's larger cities
- Incorporates public input

# Questions