

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL

A21-0243
A21-0546

FILED

December 29, 2021

OFFICE OF
APPELLATE COURTS

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood,
Mary E. Kupper, Douglas W. Backstrom, and James E.
Hougas, III, individually and on behalf of all citizens and
voting residents of Minnesota similarly situated, and
League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane,
Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota; and
Kendra Olson, Carver County Elections and Licensing
Manager, individually and on behalf of all Minnesota
county chief election officers,

Defendants.

**CITIZEN DATA SCIENTISTS’
MOTION FOR LEAVE TO
SUPPLEMENT THEIR
AMICUS CURIAE BRIEF**

Frank Sachs, Dagny Heimisdottir, Michael Arulfo,
Tanwi Prigge, Jennifer Guertin, Garrison O’Keith
McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle
Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie,
Xiongpaoo Lee, Abdirazak Mahboub, Aida Simon,
Beatriz Winters, Common Cause, OneMinnesota.org,
and Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota,

Defendant.

Amici curiae the Citizen Data Scientists hereby seek leave to supplement their *amicus* brief with the Tables presented below.

On November 30, 2021, the Citizen Data Scientists sought leave to file a brief as *amici curiae* pursuant to Minn. R. Civ. App. P. 129.01. On December 6, 2021, the Panel granted their request to file a brief but stated that *amici* would not be allowed to participate in oral argument. Two days later, on December 8, 2021, the Citizen Data Scientists served and filed their *amicus* brief. Consistent with the Panel's December 6 Order, the *amicus* brief did not address the parties' proposed plans and was limited to describing how mathematical balancing of redistricting principles yields maps that best apply the redistricting principles that the Panel had announced in its November 18, 2021 Order. Although the parties were not required to respond to the *amicus* brief, some parties nonetheless chose to cite the *amicus* brief in their December 17, 2021 briefs.

The centerpiece of the Citizen Data Scientists' December 8 *amicus* brief was the presentation of a set of "benchmarks" providing "a baseline against which the Panel can evaluate—quickly, efficiently, and transparently—any map submitted to it or drawn by the Panel itself." *Amicus Br.* at 2. As the Panel and the parties are now preparing for the January 4, 2022 oral arguments, the Citizen Data Scientists *amici* believe it may be helpful to provide the attached Supplemental Tables, which apply each of those benchmarks to the current set of proposed congressional, senate, and house redistricting plans.

Supplemental Table: Congressional Plans

Italics = larger number is the goal; regular text = smaller number is the goal

= Benchmark

= Does Not Satisfy Benchmark

= Satisfies Benchmark, but is not the Best Score

= Best Score

CONGRESSIONAL PLAN COMPARISON							
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Corrie Alternative	Citizen Data Scientists
POPULATION EQUALITY: Maximum population deviation.	1 person/ 0.00014%	1 person/ 0.00014%	1 person/ 0.00014%	2 persons/ 0.00028%	54 persons/ 0.0076%	1 person/ 0.00014%	1 person/ 0.00014%
MINORITY OPPORTUNITY: <i>Number of districts with at least a 30% minority voting-age population.</i>	2	2	2	2	2	2	2
INDIAN RESERVATIONS: Number of divisions of contiguous portions of a tribe's reservation lands.	0	0	0	1	0	0	0
CONTIGUITY: Number of districts containing more than one "distinct area."	0	0	0	0	0	0	0
POLITICAL SUBDIVISIONS:							
• Number of counties divided.	8	12	7	11	17	16	6
• Number of counties divided into > 2 districts.	1	4	3	2	2	2	1
• Number of counties divided into > 3 districts.	0	2	0	1	1	1	0
• Number of county subdivisions (cities and townships) divided.	9	10	7	13	25	27	7
• Number of county subdivisions (cities and townships) divided into >2 districts.	0	0	0	0	1	1	0

CONGRESSIONAL PLAN COMPARISON							
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Corrie Alternative	Citizen Data Scientists
PRECINCTS: Number of voting districts divided.	9	10	14	9	43	45	7
COMMUNITIES OF INTEREST:							
• Number of districts with Minneapolis residents.	1	1	1	1	2	2	1
• Number of splits of Minneapolis neighborhoods.	0	0	0	0	0	0	0
• Number of districts with Saint Paul residents.	1	1	1	1	1	1	1
• Number of splits of Saint Paul planning districts.	0	0	0	0	0	0	0
• Number of districts containing both Minneapolis and Saint Paul residents.	0	0	0	0	0	0	0
• Number of districts containing both Metro area and Greater Minnesota residents.	3	4	3	3	3	3	3
• Number of districts with Iron Range residents.	1	1	1	1	1	1	1
COMPACTNESS:							
• <i>Mean Reock.</i>	0.40	0.39	0.42	0.44	0.43	0.43	0.46
• <i>Mean Polsby-Popper.</i>	0.30	0.27	0.33	0.35	0.37	0.36	0.37
• <i>Mean Area/Convex Hull.</i>	0.70	0.73	0.76	0.80	0.82	0.82	0.79
• <i>Mean Population Polygon.</i>	0.70	0.68	0.71	0.77	0.77	0.77	0.73
• <i>Mean Population Circle.</i>	0.40	0.37	0.36	0.38	0.41	0.40	0.48

Supplemental Table: Senate Plans

Italics = larger number is the goal; regular text = smaller number is the goal

= Benchmark

= Does Not Satisfy Benchmark

= Satisfies Benchmark, but is not the Best Score

= Best Score

SENATE PLAN COMPARISON						
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Citizen Data Scientists
POPULATION EQUALITY: Maximum population deviation.	1,040 persons/ 1.22%	3,262 persons/ 3.83%	1,620 persons/ 1.90%	1,660 persons/ 1.95%	771 persons/ 0.91%	824 persons/ 0.97%
MINORITY OPPORTUNITY: <i>Number of districts with at least a 30% minority voting-age population.</i>	10	10	9	9	10	13
INDIAN RESERVATIONS: Number of divisions of contiguous portions of a tribe's reservation lands.	0	2	2	4	1	0
CONTIGUITY: Number of districts containing more than one "distinct area."	0	0	0	0	0	0
POLITICAL SUBDIVISIONS:						
• Number of counties divided.	38	45	33	33	46	34
• Number of counties divided into > 2 districts.	31	20	18	17	22	28
• Number of counties divided into > 3 districts.	11	7	12	8	11	10
• Number of county subdivisions (cities and townships) divided.	55	38	31	36	129	49
• Number of county subdivisions (cities and townships) divided into >2 districts.	22	5	5	10	16	19

SENATE PLAN COMPARISON						
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Citizen Data Scientists
PRECINCTS: Number of voting districts divided.	120	1	98	56	229	103
COMMUNITIES OF INTEREST:						
• Number of districts with Minneapolis residents.	9	6	6	6	7	8
• Number of splits of Minneapolis neighborhoods.	5	11	10	13	14	3
• Number of districts with Saint Paul residents.	7	4	4	4	5	6
• Number of splits of St. Paul planning districts.	3	7	9	9	8	2
• Number of districts containing both Minneapolis and Saint Paul residents.	0	0	0	0	0	0
• Number of districts containing both Metro area and Greater Minnesota residents.	4	7	7	7	9	0
• Number of districts with Iron Range residents.	7	6	6	6	7	6
COMPACTNESS:						
• <i>Mean Reock.</i>	0.40	0.45	0.42	0.43	0.44	0.43
• <i>Mean Polsby-Popper.</i>	0.30	0.40	0.40	0.37	0.39	0.37
• <i>Mean Area/Convex Hull.</i>	0.70	0.79	0.78	0.78	0.79	0.77
• <i>Mean Population Polygon.</i>	0.70	0.76	0.76	0.76	0.76	0.73
• <i>Mean Population Circle.</i>	0.40	0.48	0.44	0.44	0.46	0.43

Supplemental Table: House Plans

Italics = larger number is the goal; regular text = smaller number is the goal

= Benchmark

= Does Not Satisfy Benchmark

= Satisfies Benchmark, but is not the Best Score

= Best Score

HOUSE PLAN COMPARISON						
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Citizen Data Scientists
POPULATION EQUALITY: Maximum population deviation.	596 persons/ 1.40%	1,688 persons/ 3.96%	842 persons/ 1.98%	844 persons/ 1.98%	477 persons/ 1.12%	421 persons/ 0.99%
MINORITY OPPORTUNITY: <i>Number of districts with at least a 30% minority voting-age population.</i>	20	21	18	24	24	22
INDIAN RESERVATIONS: Number of divisions of contiguous portions of a tribe's reservation lands.	0	2	3	4	1	0
CONTIGUITY: Number of districts containing more than one "distinct area."	0	0	0	0	0	0
POLITICAL SUBDIVISIONS:						
• Number of counties divided.	45	54	40	50	54	41
• Number of counties divided into > 2 districts.	33	32	23	22	33	30
• Number of counties divided into > 3 districts.	26	19	16	15	19	23
• Number of county subdivisions (cities and townships) divided.	70	73	43	69	183	65
• Number of county subdivisions (cities and townships) divided into >2 districts.	36	14	17	14	33	32

HOUSE PLAN COMPARISON						
REDISTRICTING PRINCIPLE & Metric(s)	Benchmarks	Wattson	Anderson	Sachs	Corrie	Citizen Data Scientists
PRECINCTS: Number of voting districts divided.	180	28	187	113	357	149
COMMUNITIES OF INTEREST:						
• Number of districts with Minneapolis residents.	15	11	11	11	12	13
• Number of splits of Minneapolis neighborhoods.	10	20	18	24	21	6
• Number of districts with Saint Paul residents.	11	8	8	8	9	9
• Number of splits of St. Paul planning districts.	5	11	12	13	12	3
• Number of districts containing both Minneapolis and Saint Paul residents.	0	0	0	0	0	0
• Number of districts containing both Metro area and Greater Minnesota residents.	7	9	8	7	10	0
• Number of districts with Iron Range residents.	13	10	11	10	11	11
COMPACTNESS:						
• <i>Mean Reock.</i>	0.40	0.42	0.44	0.43	0.45	0.45
• <i>Mean Polsby-Popper.</i>	0.35	0.38	0.43	0.39	0.41	0.42
• <i>Mean Area/Convex Hull.</i>	0.70	0.77	0.80	0.78	0.79	0.81
• <i>Mean Population Polygon.</i>	0.70	0.73	0.78	0.75	0.76	0.78
• <i>Mean Population Circle.</i>	0.40	0.43	0.45	0.44	0.45	0.45

CONCLUSION

For the foregoing reasons, the Citizen Data Scientists respectfully request that the Panel grant them leave to supplement their *amicus* brief by accepting the Tables presented in this Motion.

Dated: December 29, 2021

Respectfully submitted,

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CERTIFICATION OF DOCUMENT LENGTH

The undersigned hereby certifies that this Motion for Leave to Supplement *Amicus Curiae* Brief complies with the length limitations in Minn. R. Civ. App. P. 129.01(c), if they apply here. The Motion contains 1,283 words, inclusive of any footnotes and tables and exclusive of the caption and signature block (or 288 words, if tables are excluded).

Dated: December 29, 2021

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