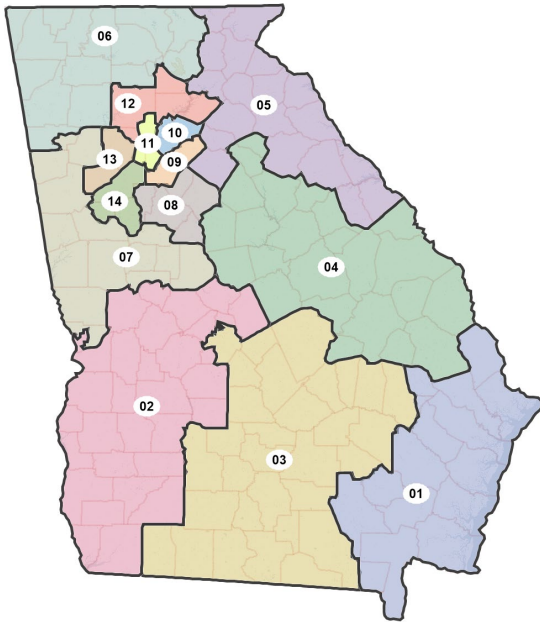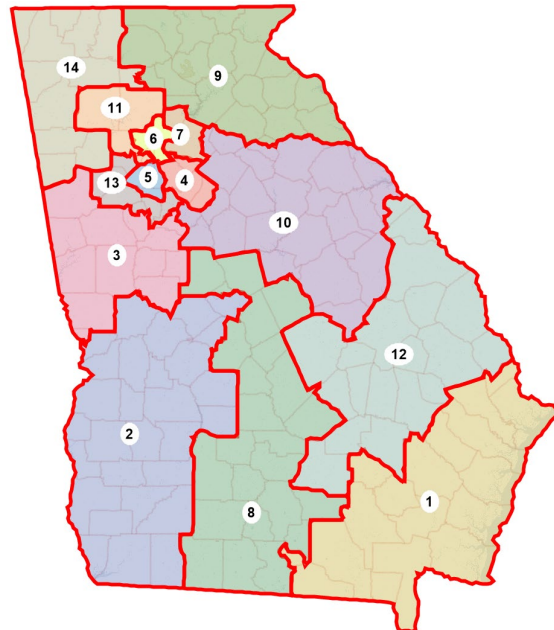# Report on Proposed Georgia Congressional Redistricting Plan

Jerry Yan
Stanford Law School
January 17, 2022

*Proposed Plan*

*2011 Plan*

## I.      Introduction

My proposed congressional redistricting plan accurately and fairly reflects Georgia's changing racial and partisan makeup. My proposed plan contains four majority-Black districts and two coalition majority-minority districts, one of which could perform as a Black ability-to-elect district. According to PlanScore, my proposed plan slightly favors Democrats, but is still expected to yield a congressional delegation with seven Democrats and seven Republicans. PlanScore also estimates that the plan includes two competitive seats.

My proposed plan complies with federal constitutional and statutory requirements. All the districts deviate by no more than one person from the ideal, complying with one-person, one-vote principles. *Karcher v. Daggett*, 462 U.S. 725, 732 (1983). The map does not violate the Fourteenth Amendment by impermissibly subordinating race-neutral redistricting criteria to racial considerations. *Ala. Black Legis. Caucus v. Alabama*, 575 U.S. 254, 272 (2015); *Miller v. Johnson*, 515 U.S. 900, 916 (1995). And the map complies with the Voting Rights Act by enhancing minority voting strength statewide by drawing four compact majority-Black districts that will enable Black voters to elect their candidates of choice. The map additionally complies with Georgia state law and redistricting guidelines by maintaining contiguity and giving due consideration to compactness, political subdivision lines, and communities of interest.

## II.      Georgia's 2011 Redistricting Plan

For the last ten years, Georgia's congressional elections have used a map enacted by the Georgia Legislature in 2011, when Georgia was still subject to preclearance under Section 5 of the Voting Rights Act.[1] The 2011 plan is depicted below.

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[1] Georgia adopted new districts using 2020 Census data on December 30, 2021. I will compare my plan to the 2011 plan, rather than the 2021 plan.
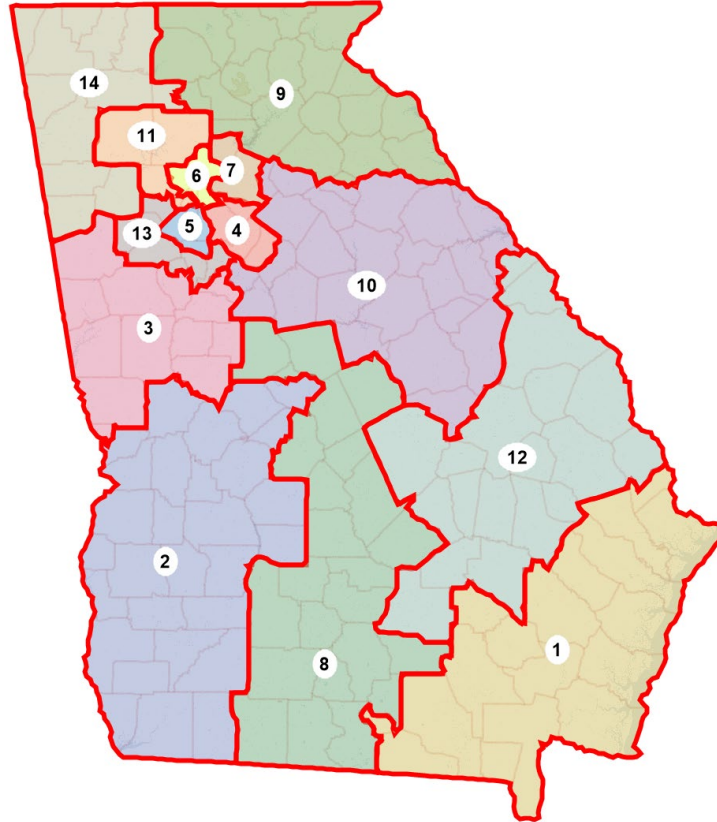
The 2011 plan created four majority-Black districts (Districts 2, 4, 5, and 13), one majority-minority coalition district (District 7), and nine majority-White districts. The Department of Justice did not object to the plan under Section 5 of the Voting Rights Act. *Status of Statewide Redistricting Plans*, U.S. Dep't of Justice (Feb. 10, 2020), https://www.justice.gov/crt/status-statewide-redistricting-plans.

The 2011 plan also favors Republicans. As late as 2019, only Districts 2, 4, 5, and 13 were represented by Democrats. In 2020, Districts 6 and 7 also elected Democrats. As a result, Georgia currently has an eight Republican, six Democrat congressional delegation, even though President Biden won the state in 2020 and the state elected two Democratic senators in runoff elections the same election cycle.

**III. My Proposed Plan: Plan-Level Design and Compliance**

I designed my proposed plan with two primary objectives:

1. Responding to ongoing demographic and political changes in Georgia by drawing a fair map that reflects Georgia's statewide racial and partisan makeup.
2. Complying with applicable law, including:
    a. One person, one vote.
    b. The Voting Rights Act.
    c. Applicable state requirements and guidance.


A. Responding to Demographic and Political Changes in Georgia

The shift in the partisan makeup of Georgia's congressional delegation from four Democrats to six Democrats between 2011 and 2020 reflects broader shifts in Georgia's population and politics during that time. Most obviously, the state has swung significantly towards Democrats in recent statewide elections. In 2020, President Biden became the first Democratic presidential nominee to win Georgia since Bill Clinton in 1992, winning 49.5% of the statewide vote. In comparison, both President Obama and Hillary Clinton won 45.4% of the statewide vote in 2012 and 2016, respectively. Georgia's also population grew by nearly 10.5% between the 2010 and 2020 Censuses. Yurij Rudensky & Gabriella Limon, *State Redistricting Profile: Georgia*, Brennan Center (Oct. 8, 2021), https://www.brennancenter.org/our-work/research-reports/state-redistricting-profile-georgia. The population growth has primarily occurred in major cities and their surrounding environs, while rural areas saw their population stagnate or even decrease. The Brennan Center illustrated these shifts in the below graphic.

**Population Change by County, 2010–20**



−5,000        +150,000
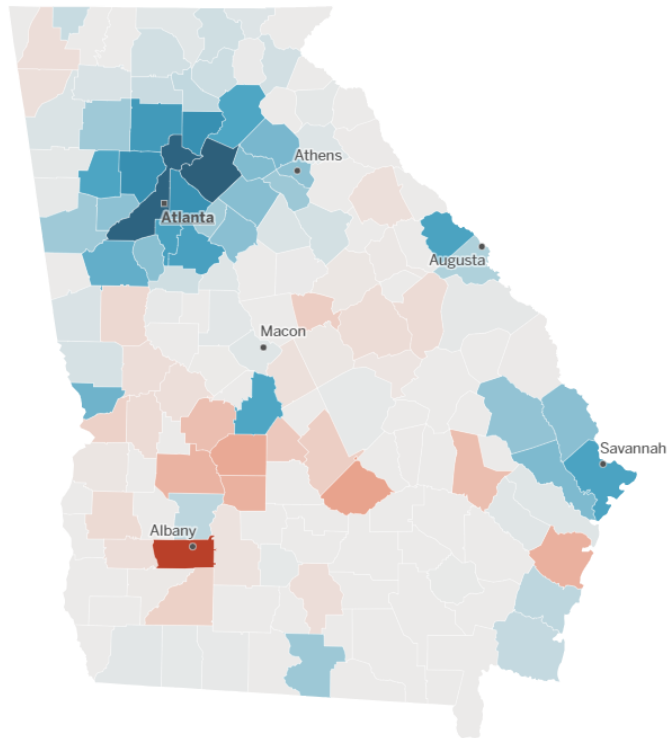
**Source:** U.S. Census Bureau.

Georgia's significant population changes since 2011 meant that complying with one person, one vote required substantial redrawing of district lines. For example, District 7 in the current map, located in Gwinnett County in the northeast Atlanta area, is now over 12% overpopulated. District 2, located in the southwestern corner of Georgia, is now over 12% underpopulated.

I started drawing the map by first dividing the 2011 map into three regions: Southern Georgia, comprised of Districts 1, 2, 8 and 12; Northern Georgia (excluding Atlanta), comprised of Districts 3, 9, 10 and 14; and the Atlanta Metro area, comprised of Districts 4, 5, 6, 7, 11, and 13.[2] The percentages correspond to how much each district is under- or over-populated.

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[2] I use the Atlanta Regional Commission's definition of the Atlanta Region, which includes 11 counties: Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, and Rockdale. *About the Atlanta Region*, Atlanta Regional Commission, https://atlantaregional.org/atlanta-region/about-the-atlanta-region.
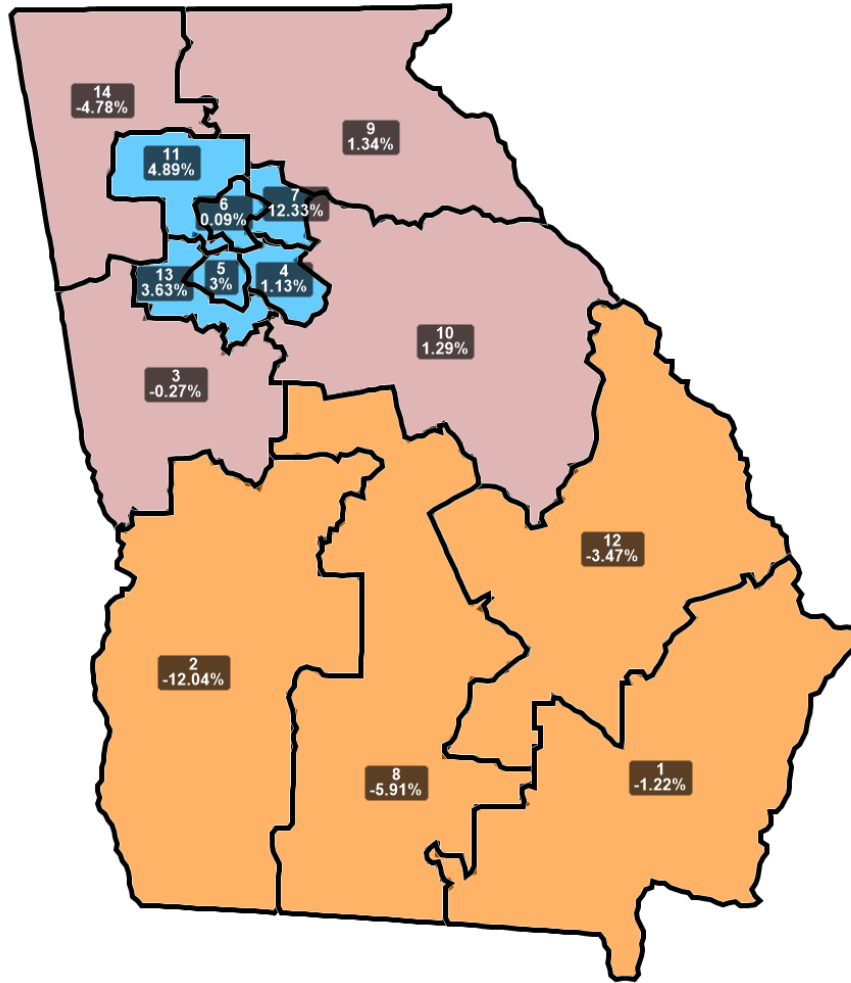
The four Southern Georgia districts (in orange) are underpopulated by about 5.66% on average. The Atlanta-area districts (in blue), on the other hand, are significantly overpopulated by about 4.22% on average. To account for these population shifts, I decided to remove one district from Southern Georgia and move it into the Atlanta area.

Because the 2011 map favors Republicans, moving a district from Republican-dominated rural areas to the Democratic-dominated Atlanta region will also advance my goal of producing a fair map that reflects Georgia's status as a purple state. According to PlanScore, my map slightly favors Democrats but would still likely elect a congressional delegation split evenly between Democrats and Republicans. Democrats would have a greater than 90% chance of winning in

five of the six Atlanta districts, while Republicans would have a greater than 90% chance in winning one of the Atlanta districts and four rural districts. The remaining four seats would be at least somewhat competitive. Each party would have a greater than 75% chance of winning in one of the four, while the remaining two seats could change hands in any given election. In sum, both parties can expect to control at least six seats in the delegation with a strong likelihood of winning at least one more seat.

### B. Plan-Level Legal Compliance

The plan complies with all legal requirements that apply to the plan as a whole.

First, the plan satisfies one person, one vote requirements. Under *Karcher v. Daggett*, 462 U.S. 725 (1983), congressional redistricting plans must achieve perfect population equality. *Id.* at 732. As all 14 districts in my plan deviate by no more than one person from the ideal, the plan complies with one person, one vote requirements under *Karcher*.

Second, the plan satisfies applicable state law and guidance. Georgia law does not impose any additional criteria or requirements for congressional redistricting. But the Georgia Legislature committees with jurisdiction over redistricting adopted guidelines for themselves to follow when drawing districts. *See Legislative and Congressional Reapportionment Office*, Georgia General Assembly, https://www.legis.ga.gov/joint-office/reapportionment. Some of these criteria are redundant because they merely require that the two committees comply with applicable federal and state law. The only new criteria contained in the guidelines are: (1) the districts must be contiguous; (2) no multi-member districts are permitted; (3) efforts should be made to avoid the unnecessary pairing of incumbents; and (4) the committees should consider county and precinct boundaries, district compactness, and communities of interest.

My plan complies with most of these guidelines. First, all districts are contiguous and avoid point contiguity. Second, all the districts are represented by a single member. Third, I avoided county and precinct splits (the current plan splits 16 counties, while mine only splits 15), created compact districts, and tried to keep communities of interest intact where possible. I did not, however, consider potential incumbent matchups because I did not have access to their addresses. Nevertheless, the committee's guidelines make clear that these principles are neither exhaustive nor binding. At any rate, the committee guidelines do not require that I minimize the number of subdivision splits and instead merely suggest that I consider these factors.

Because my plan complies with one person, one vote and applicable state guidance, the plan as a whole complies with all applicable state and federal law. Next, I will discuss individual districts and district-level legal compliance issues, including potential *Shaw* and Voting Rights Act issues. *See Ala. Legis. Black Caucus v. Alabama*, 575 U.S. 254, 262 (2015) (holding that racial gerrymandering claims "appl[y] to the boundaries of individual districts" rather than "a State considered as an undifferentiated 'whole'"). I will begin with Southern Georgia, before moving to Northern Georgia and finishing with the Atlanta region.

## IV.    Southern Georgia

My plan divides Southern Georgia into three districts: Districts 1, 2 and 3. District 2 is a majority-Black district, and I will discuss potential Voting Rights Act and *Shaw* issues posed by District 2 first before briefly discussing Districts 1 and 3. The districts are shown below, with a heatmap shaded by voting district according to BVAP.
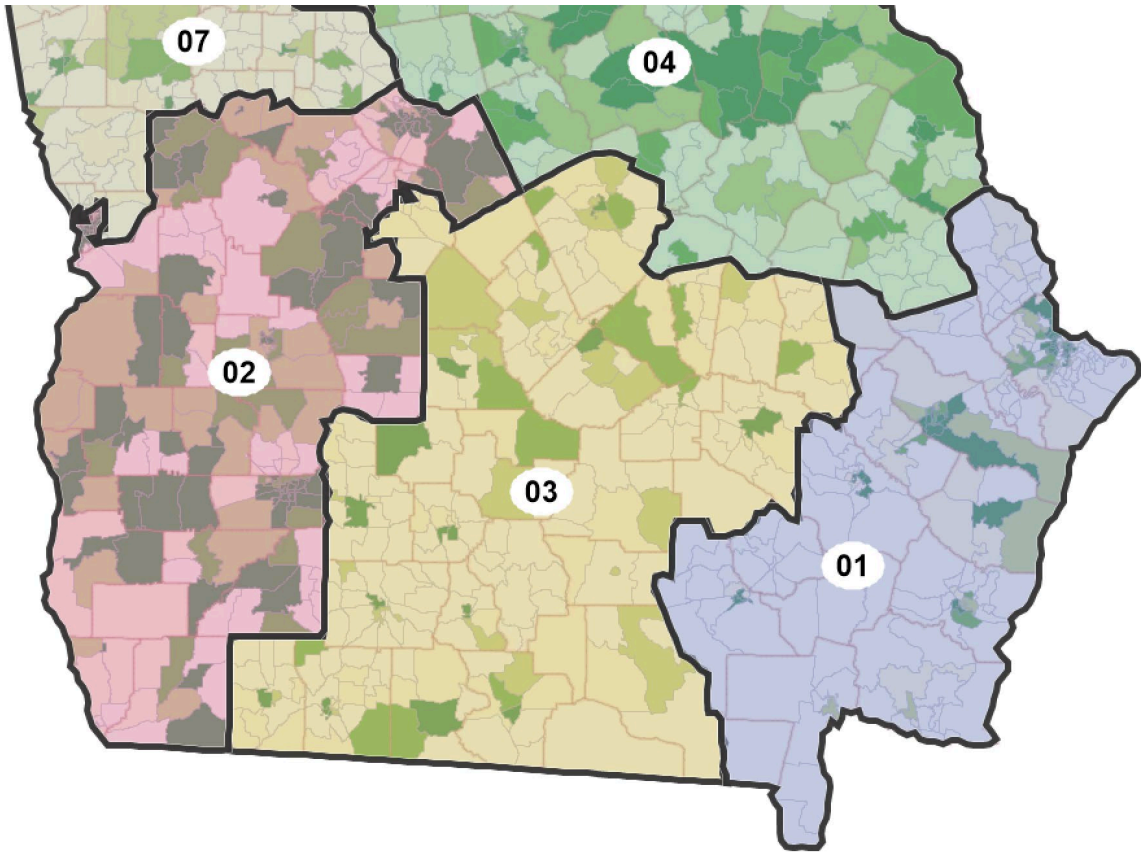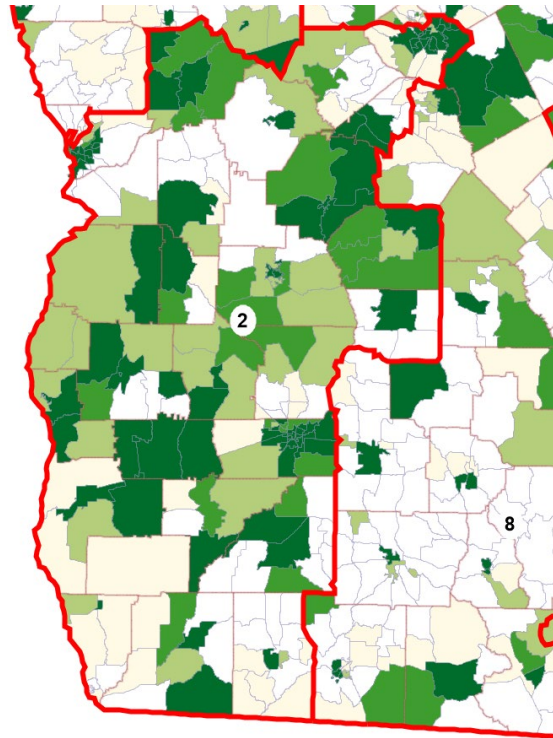
A. <u>District 2</u>

As discussed above, District 2 in the 2011 map is a majority-Black district underpopulated by over 12%. Achieving population equality in District 2 while also trying to preserve District 2 as a majority-Black district proved to be difficult because many of the counties that surround District 2 are predominately White. To further complicate matters, District 2, even when underpopulated, has a BVAP of just 51.12%. To achieve population equality while preserving the Black majority in the district, I shed some of the former District 2's White population in the southern part of the district and picked up high-BVAP regions to the district's north and east. The resulting district has a BVAP of 50.22% and is shown below next to the current District 2 with a heatmap shaded by voting district according to BVAP.

<div align="center">
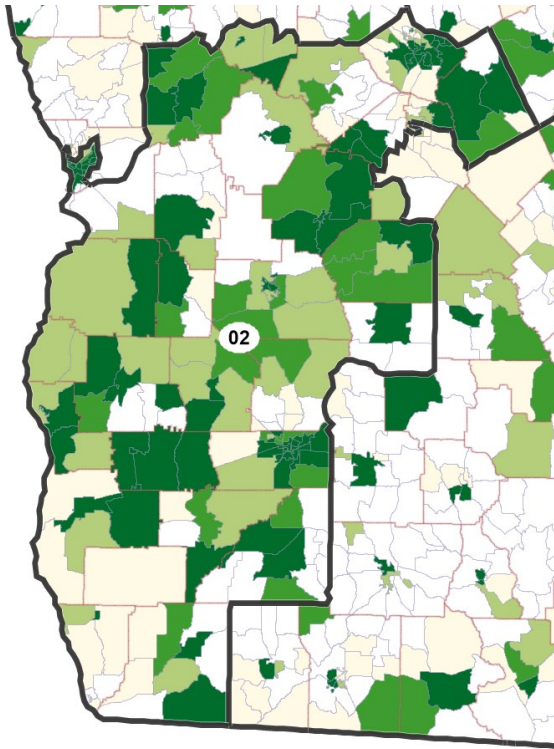
*Proposed District 2*              *2011 District 2*

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District 2 is also constitutional. A *Shaw* challenge against District 2 is unlikely to succeed because race was not the predominant factor when I drew its lines. *See ALBC*, 575 U.S. at 272; *Miller v. Johnson*, 515 U.S. 900, 916 (1995). District 2 is a compact district that respects county lines, preserves much of the existing boundaries of District 2, and avoids the bizarre outcrops and winding shapes that doomed the district challenged in *Shaw*. *See also League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 424 (2006).

Even if a court were to find that race predominated, District 2 satisfies strict scrutiny because it is necessary to comply with Section 2 of the Voting Rights Act. Satisfying *Shaw* requires two showings: a compelling state interest and narrow tailoring. *Cooper v. Harris*, 137 S. Ct. 1455, 1464 (2017). Both showings can be made here.

First, the Supreme Court has "long assumed that complying with the VRA is a compelling interest" for the purposes of *Shaw*. *Cooper*, 137 S. Ct. at 1464. Compliance with Section 2 would therefore likely satisfy the compelling interest prong of *Shaw*.[3]

Second, to satisfy the narrow tailoring requirement, the jurisdiction must show that it had a "strong basis in evidence . . . to think that it would transgress the [VRA] if it did *not* draw race-based district lines." *Cooper*, 137 S. Ct. at 1464. To establish a "strong basis in evidence," a jurisdiction must establish each of the three *Gingles* factors: that the minority population is "sufficiently large and geographically compact to constitute a majority in a single-member district," that the minority group is politically cohesive, and that the majority votes as a bloc to consistently frustrate the minority's ability to elect the candidates of their choice. *Id.* at 1470 (citing *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986)). All three factors are clearly present in southwest Georgia. In both Georgia's 2011 plan and my proposed plan, Black voters make up a majority of the voting-age population in District 2, satisfying the first *Gingles* criterion. And it is well-documented that elections in Georgia are deeply polarized along racial lines. That is, Black voters in Georgia vote cohesively and support different candidates than white voters do. For example, one analysis of the 2021 United States Senate runoff election in Georgia found that the Democratic candidates won just 30% of White Georgia voters voted for the Democratic candidates, compared to 90% of Black voters and two-thirds of Asian-American voters. Sharon Austin, *How New Voters and Black Women Transformed Georgia's Politics*, The Conversation

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[3] The Court has never formally held that compliance with the Voting Rights Act is a compelling interest. *See, e.g.*, *Shaw v. Hunt*, 517 U.S. 899, 915 (1996) ("We assume, *arguendo*, for the purpose of resolving this suit, that compliance with § 2 could be a compelling interest . . . ."). But without anything else to work with, I adopt the Court's assumption that Section 2 compliance is a compelling interest for the purposes of *Shaw*.

(Jan. 26, 2021), https://theconversation.com/how-new-voters-and-black-women-transformed-georgias-politics-152741.[4]

The question then becomes whether District 2 satisfies Section 2's requirement, that is, whether it affords Black voters the opportunity to elect their preferred candidates. This seems likely for two reasons. First, District 2 currently has a Black incumbent, Sanford Bishop, Jr., who has enjoyed strong support within the district over the last decade, consistently winning about 60% of the vote while running unopposed in the Democratic primaries. Because District 2 largely preserves the current district's lines and has a BVAP within 1% of the 2011 District 2, Representative Bishop seems likely to win reelection in my proposed District 2. Indeed, PlanScore estimates that District 2 has a 76% chance to elect even a non-incumbent Democrat. Second, the proposed District 2 has a non-Hispanic White VAP of 42.2%, far from an electoral majority that would be required to frustrate Black voters' ability to elect their candidates of choice, even assuming perfect racial polarization.

My proposed District 2 is a compact, majority-Black district that enables Black voters to elect their candidate of choice. District 2 is therefore narrowly tailored to complying with Section 2 of the Voting Rights Act and would survive strict scrutiny and a *Shaw* challenge.

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[4] To be sure, the *Gingles* factors alone are not enough to prevail on a Section 2 claim. *Johnson v. De Grandy*, 512 U.S. 997, 1013 (1994). Instead, plaintiffs must provide something beyond the three factors, such as "evidence of racial relations outside the immediate confines of voting behavior." *Id.* Black voters in Georgia have ample historical and contemporary evidence of discrimination, ranging from Jim Crow laws to more recent restrictive laws passed by Georgia. *See, e.g.*, Complaint, *United States v. Georgia*, No. 1:21-cv-02575 (N.D. Ga. June 25, 2021) (alleging that Georgia's recent changes to its elections laws discriminated against minority voters). Because Black voters can establish all three of the *Gingles* factors and have historical and contemporary evidence of racial discrimination, a court could find that Section 2 requires creating a Black opportunity district in southwest Georgia. At any rate, the *Shaw* analysis does not require the jurisdiction to show that a Section 2 claim would necessarily succeed, just that the jurisdiction had "good reasons" to think that such a claim could succeed. *Cooper*, 137 S. Ct. at 1471.

B.  Districts 1 and 3

The remaining two districts in Southern Georgia do not raise any significant *Shaw* or Voting Rights Act issues. In keeping with the Georgia Legislature's guidance, I prioritized compactness and preserving county lines. District 1 only splits one county, while District 3 splits two. Both are expected to elect Republican candidates.

District 1 contains the majority-Black city of Savannah, but District 1 is not a majority-Black district. This does not violate the Voting Rights Act because the Black residents of Savannah are not sufficiently numerous or close enough to other Black communities to constitute a majority in a compact congressional district and therefore cannot establish the first *Gingles* factor. I instead prioritized race-neutral criteria and sought to retain the core of the 2011 District 1 and focused on minimizing county splits. The resulting district is a compact southeast Georgia district that splits just one county. My proposed District 1 is depicted below alongside the 2011 District 1 with a racial heatmap shaded by voting district according to BVAP.
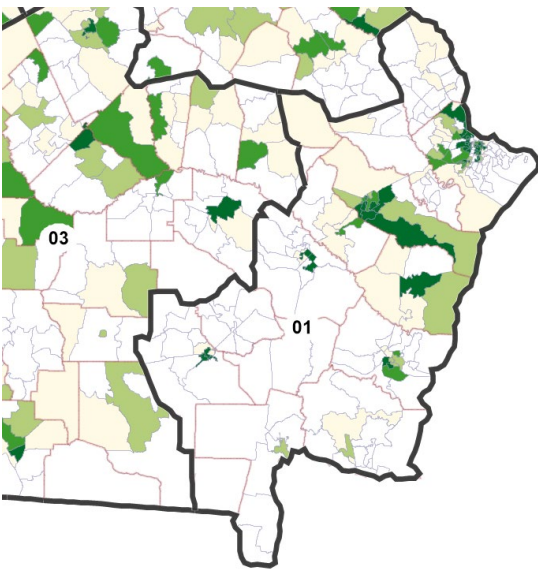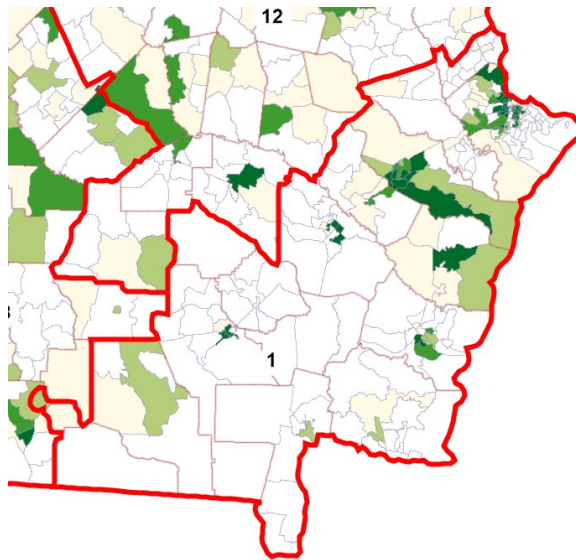


*Proposed District 1*                     *2011 District 1*

## V. Northern Georgia

Northern Georgia (excluding the Atlanta area) is divided into four districts: Districts 4, 5, 6, and 7. District 4 is the only competitive district of the four; the other three are safely Republican. I will discuss some of the tradeoffs that went into drawing District 4 before briefly discussing the remaining three districts. All four districts are shown below.
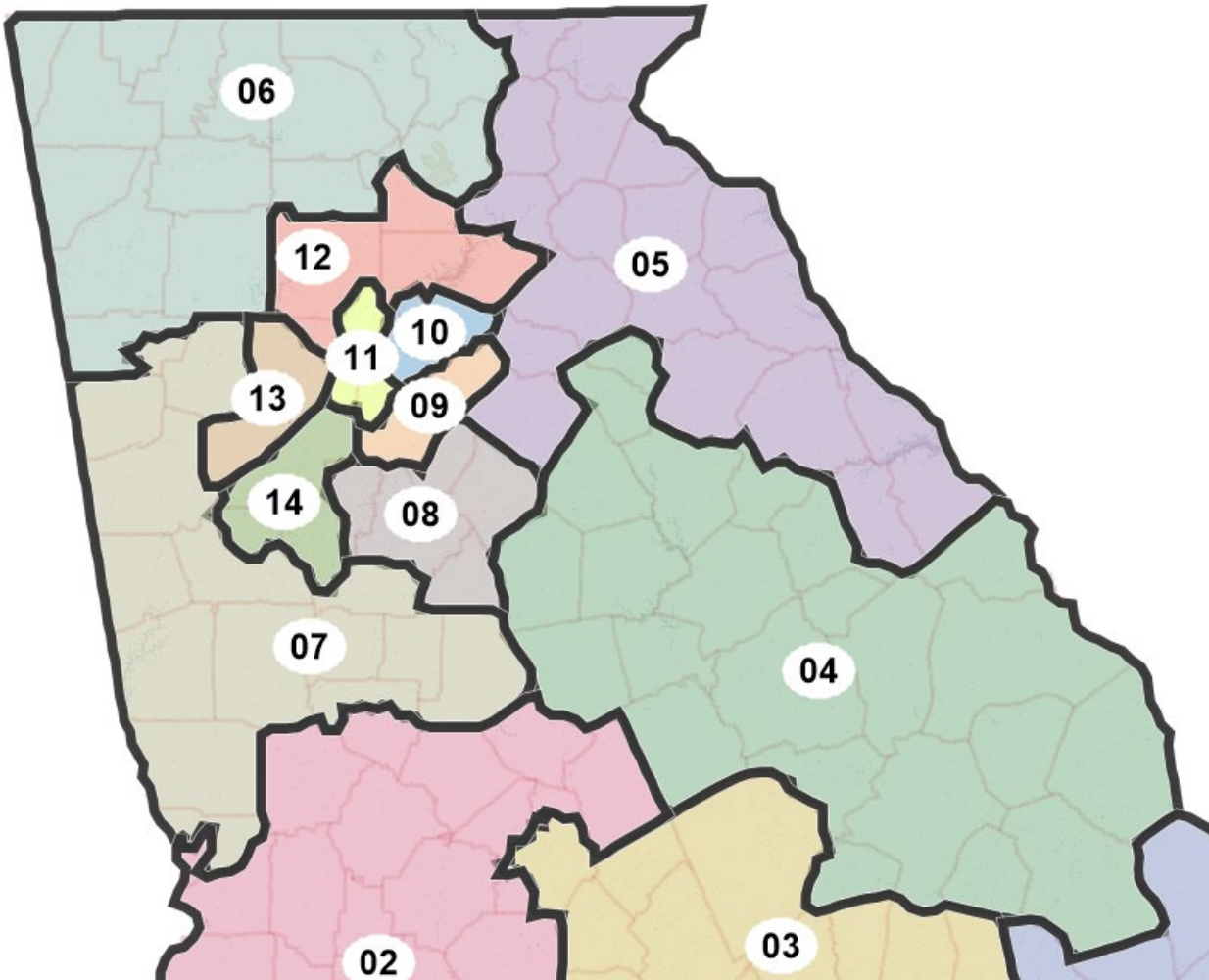


### A. District 4

District 4 is a competitive swing district that includes two major urban centers, Athens and Augusta, and a large portion of rural Eastern Georgia. The rural areas skew White and

Republican, while the urban areas skew Black and Democratic. District 4 is shown below with a heatmap colored by voting district according to BVAP.
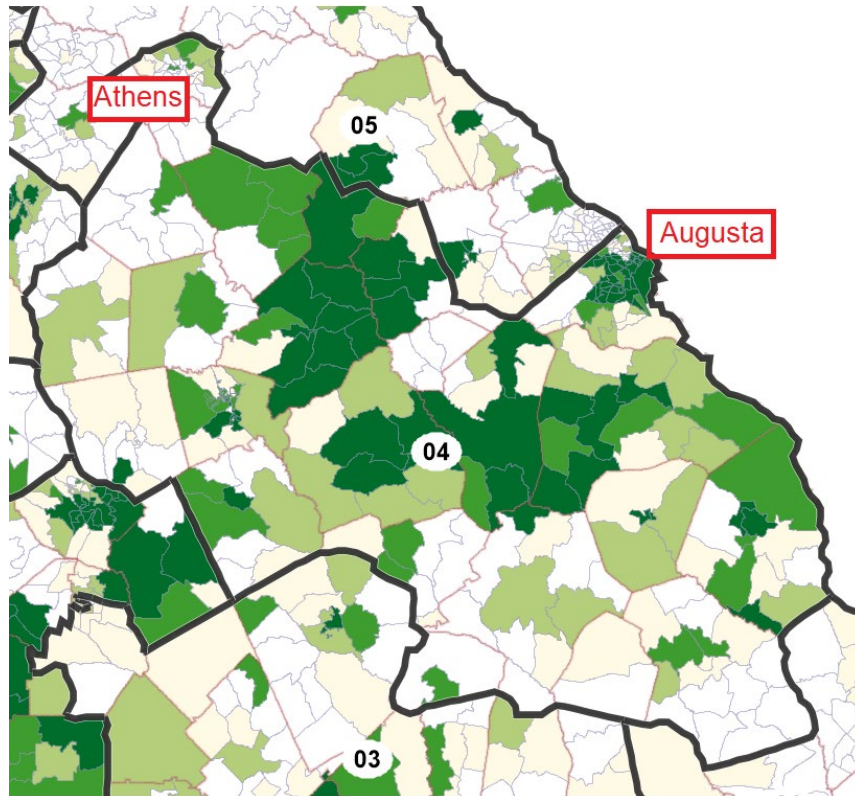


District 4 has a BVAP of 36.2%, which is primarily made up of Black voters who live in and around Augusta. While 36.2% is substantial, District 4 is well short of a Black majority. This may raise some questions about compliance with the Voting Rights Act, but I found that it was impossible to draw a majority Black district that included Augusta without either taking Black voters from District 2 or drawing long arms that reach into the Atlanta area to pick up Black voters and increase District 4's BVAP. Neither is viable. The former could raise serious questions under Section 2 of the Voting Rights Act because District 2 is already barely majority-Black (BVAP of 50.22%), and taking Black voters from that district may endanger Black voters' ability to elect their candidates of choice in that district. The latter would likely produce a bizarrely shaped district that would run headlong into *Shaw*.

As it was not possible to draw a compact majority-Black district in Eastern Georgia, I prioritized competitiveness, compactness, and preserving political subdivision lines instead. The resulting district is shaped like a parallelogram, and splits one county. The district has a knob along its northern border that contains the city of Athens. I included Athens in District 4 to avoid splitting up Democratic voters who live in Athens and Augusta. If Athens were in District 5 while Augusta stayed in District 4, then neither district would have been competitive; both districts would have been reliably Republican. Rather than submerging these Democratic-leaning urban areas in heavily Republican rural districts, I decided to sacrifice some compactness in exchange for competitiveness. According to PlanScore, District 4 is almost perfectly evenly divided between Biden and Trump voters, and a non-incumbent Democrat has a 51% chance of winning an election in the district.

## B.  Districts 5, 6, and 7

The remaining three districts in Northern Georgia do not raise any significant issues under the Voting Rights Act or *Shaw*. In keeping with the Georgia Legislature's guidance, I prioritized maintaining compactness and preserving county lines. District 5 splits two counties, District 6 splits two counties, and District 7 splits four counties. All three districts are expected to elect Republican candidates.

District 5 is shaped vaguely like the letter A due to an extra appendage in the district's southwest that runs into Walton County west of Athens. District 5's arm was largely the result of my decision to include Athens in District 4, discussed above. Had I included Athens in District 5, I would have moved some of District 5's southern counties near Augusta into District 4, creating more rectangular-shaped districts.

## VI.    The Atlanta Area

I divided the greater Atlanta area into seven districts. Five of these districts (Districts 8, 9, 11, 13, and 14) are safely Democratic, while District 12 is safely Republican. District 10, which contains parts of Gwinett, DeKalb, and Forsyth Counties, leans Democratic, with Democrats expected to win 69% of the time according to PlanScore. Three of the districts are majority-Black, with BVAPs between 57% and 62.5%. Two more of the districts are majority-minority coalition districts.

I will first examine the three majority-Black districts (Districts 8, 9, and 14), followed by the two majority-minority coalition districts (Districts 10 and 13). I will then conclude by briefly discussing the two majority-White districts (Districts 11 and 12). The Atlanta districts are depicted below with a heatmap shaded by voting district according to BVAP.
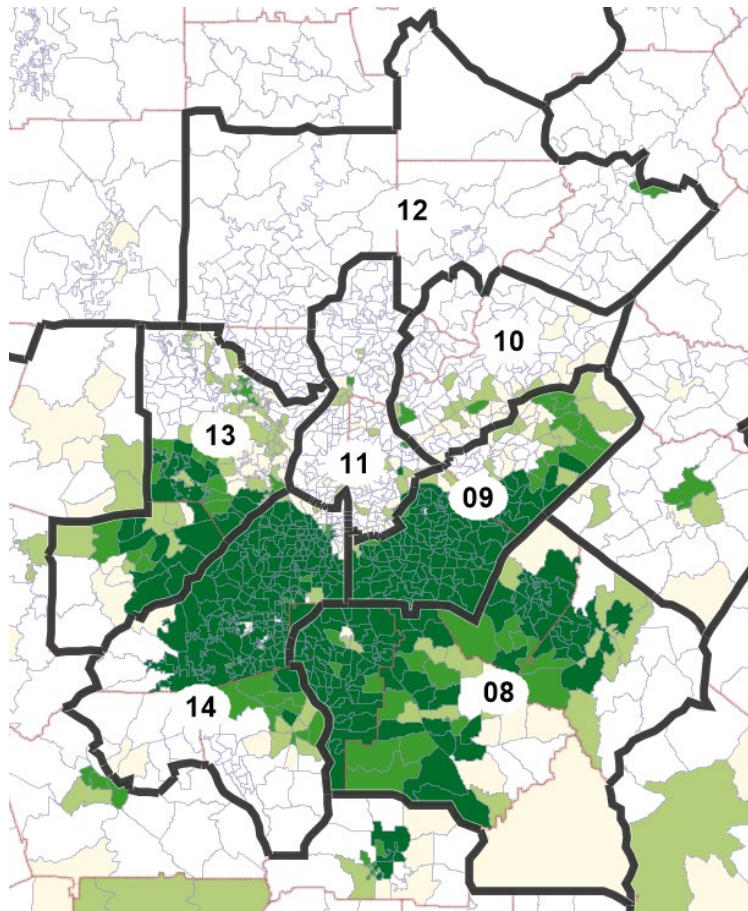
A. <u>The Majority-Black Districts</u>

Districts 8, 9, and 14 are majority-Black districts with BVAPs of 58%, 62%, and 57%, respectively. As I quickly discovered, it is very easy to draw three majority-Black districts in the area (as the current plan does). Virtually any good-faith attempt to draw compact districts in the Atlanta area will produce three majority-Black districts, but it is much harder to draw four majority-Black districts because the Black population in Atlanta is so compact. Drawing four majority-Black districts would have likely required drawing districts with long arms that reach across county lines and into Atlanta to carve up its Black residents into four different districts. Such bizarrely shaped districts would be vulnerable to a *Shaw* challenge.

*Shaw* would not be a problem if a fourth majority-Black district in Atlanta (and fifth majority-Black district statewide) is needed to comply with Section 2 of the Voting Rights Act. *Cooper v. Harris*, 137 S. Ct. 1455, 1464 (2017). But it is far from clear that Section 2 requires such a district. First, four majority-Black districts statewide in Georgia would mean that Black voters make up majorities in about 29% of the districts in the state. In *Johnson v. De Grandy*, 512 U.S. 997 (1994), the Supreme Court held that a Section 2 claim is less likely to succeed where "minority voters form effective voting majorities in a number of [] districts roughly proportional to their respective shares in the voting-age population." *Id.* at 1000. Black voters make up 32% of the voting-age population in Georgia. 29% is already "roughly proportional" to 32%, so adding a fifth majority-Black district is not necessary to make my plan proportional to Black voters' share of voting-age population. Indeed, adding such a district would exceed proportionality by making 36% of the districts majority-Black. Under *De Grandy*, a court could then find that drawing such a district is not needed to comply with Section 2.

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To be sure, "proportionality is not dispositive in a challenge to single-member districting." *De Grandy*, 512 U.S. at 1000. Instead, proportionality is a "relevant fact in the totality of circumstances to be analyzed" when determining whether Section 2 requires additional majority-minority districts. *Id.* at 1000, 1014. Even so, it is not clear what evidence Black voters could provide to show that they would be denied equal political opportunities when the redistricting plan achieves rough proportionality. Would-be plaintiffs could certainly point to historical anti-Black discrimination in Georgia and Georgia's recent changes to its election laws following the 2020 election as evidence of past and ongoing discrimination against Black persons in the state. *See generally* Complaint, *United States v. Georgia*, No. 1:21-cv-02575 (N.D. Ga. June 25, 2021) (alleging that Georgia's recent changes to its elections laws discriminated against minority voters). But even if a court were to agree that Georgia's recent facially race-neutral changes are evidence of racial discrimination, *De Grandy* held that evidence of "continuing discrimination" against Latinos in Florida and Dade County was not enough to require Florida to exceed proportionality and draw more majority-Latino districts in Dade County. *Id.* at 1013-14 ("Treating equal political opportunity as the focus on the enquiry, we do not see how these district lines . . . deny equal political opportunity."). Unless Black plaintiffs could prove that they are denied equal political opportunities on account of something beyond continuing discrimination, it seems unlikely that a court would hold that a fifth majority-Black district is necessary to comply with Section 2 of the Voting Rights Act.[5]

Because I am not confident that a redistricting plan with four majority-Black seats in Atlanta would survive a *Shaw* challenge, I chose instead to focus on drawing compact districts,

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[5] Recent successes by Black-favored candidates may also undercut any Section 2 claim. For example, Lucy McBath won her primary in a 56% non-Hispanic White, 15% Black VAP district in the Atlanta suburbs, and Stacey Abrams won 76% of the Democratic gubernatorial primary vote.

keeping counties whole, and achieving my desired 50/50 partisan balance in the delegation statewide. District 8 splits one county, District 9 splits two, and District 14 splits three. I did not consider race when drawing these districts, nor are they bizarrely shaped. As a result, they are likely insulated from any serious *Shaw* challenges.

To be sure, the BVAPs in these districts are rather high, perhaps unnecessarily so given how Democratic-friendly Atlanta and its environs are. But as discussed above, the high BVAPs were not the result of an intentional decision to pack Black voters into as few districts as possible, but rather the product of elevating race-neutral redistricting criteria like compactness and partisanship.

### B.  The Majority-Minority Coalition Districts

Districts 10 and 13 are both majority-minority districts in which coalitions of minority groups make up majorities of the voting-age populations. As with the majority-Black districts, I prioritized partisanship, compactness, and avoiding county splits when drawing these districts. Because I prioritized race-neutral redistricting principles over racial considerations, they do not face any serious *Shaw* issues.[6]

#### 1.  District 10

The minority population in District 10 is evenly split between Black, Hispanic, and Asian persons. It is therefore hard to say how the district would perform in terms of any of those minorities' ability to elect their candidates of choice. Most of the district's population lives in parts of Gwinnett County left over from creating the majority-Black District 9. Splitting

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[6] Coalition districts may not be required to comply with the Voting Rights Act. *Bartlett v. Strickland*, 556 U.S. 1, 19 (2009) (plurality).

Gwinnett County was necessary because Gwinnett County experienced the largest population growth of any county in the state. In the 2011 plan, most of Gwinnett County was located in District 7, which was over 12% overpopulated according to 2020 Census data.

To fill out the district, I first decided to pick up some of Republican-leaning Forsyth County because a substantial pocket of Asian-Americans lives on either side of the county line between Forsyth and Gwinnett Counties, and I wanted to preserve that community of interest. I then decided to reach into Fulton County as well to pick up some more Democratic-leaning voters in order to offset some of the Forsyth Republicans and make the district lean slightly Democratic in order to balance out the delegation statewide. At the same time, I wanted to make sure that the district was competitive because my plan already had one competitive district (District 4) and I needed another competitive district to meet my goal of creating an evenly split congressional delegation.

According to PlanScore, Democrats would win District 10 about 69% of the time.

2. District 13

District 13 is a 45% non-Hispanic White district, with the remaining voting-age population made up predominately of Black voters, who represent 35% of the overall voting-age population in the district. District 13 is based primarily in Cobb County, which Georgia's 2011 map splits three ways in order to crack Democratic voters. In order to hit my target of an evenly split congressional delegation, I decided to unify the bulk of Cobb County into a single district and join it with Democratic-leaning Douglas County to the south. I also shed some of the more conservative-leaning parts in the northern part of Cobb County, drawing those into the safely

Republican District 12. With these design choices, District 13 is expected to elect Democrats 91% of the time.

Given the relatively high share of Black voters in this district, it may also function as a Black ability-to-elect district. Democratic Representative Lucy McBath lives in the proposed District 13 and would likely be a favorite for reelection. Still, without more sophisticated statistical analyses, it is hard to say for sure whether District 13 would perform consistently for Black voters.

### C.  The Majority-White Districts

Districts 11 and 12 are both majority-White seats. As with the other districts, I tried to minimize county splits and draw compact districts.

District 11 is comprised entirely of Fulton and DeKalb Counties and is highly compact, keyhole-shaped district. The district is expected to elect a Democrat 97% of the time.

District 12, however, splits four counties, the most of any district in my plan. These splits were necessary in order to achieve my overall partisan balance and because of other design decisions I made in the Atlanta-area districts, like keeping the Asian-American community together in District 10. District 12 is expected to elect a Republican 98% of the time.