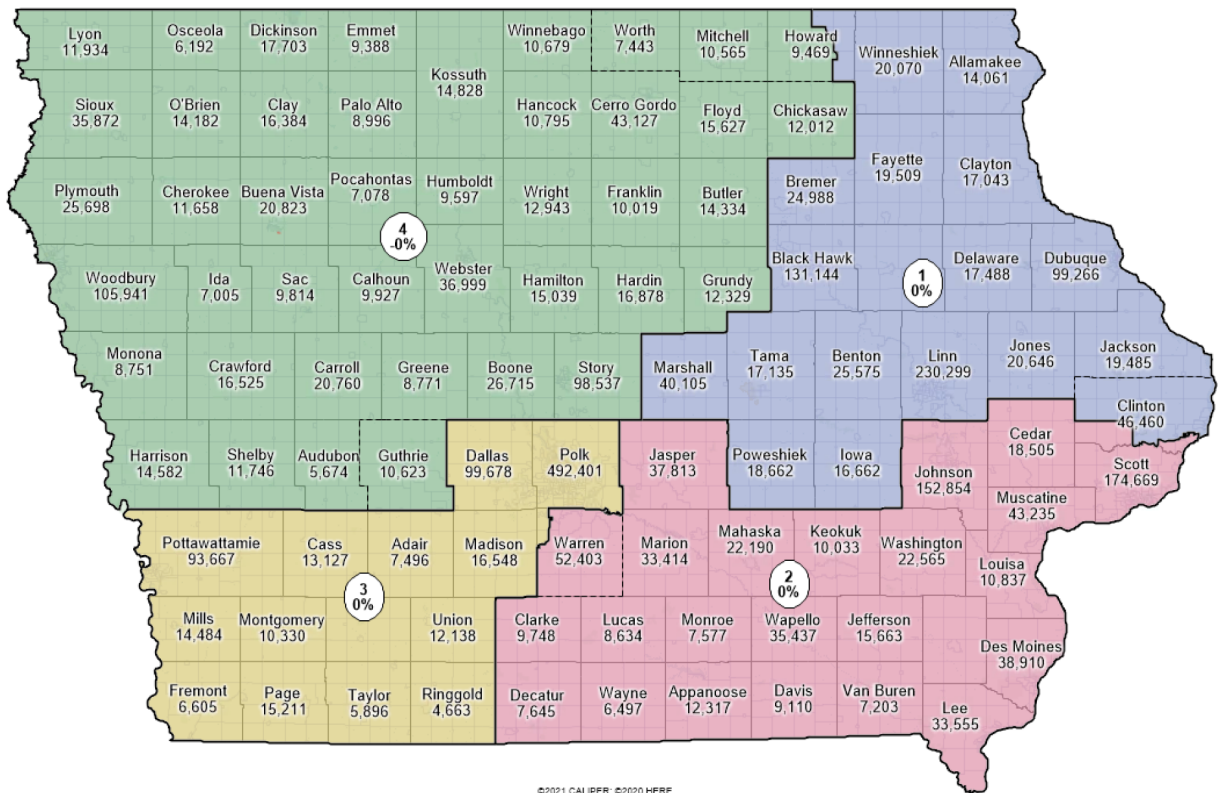


Iowa

Least Change Plan¹



I. Introduction

This Iowa map was designed to follow the preexisting map's lines to the greatest extent possible. For the most part, the lines were unmoved, with four instances of deviation. I chose to allow for some more deviation in order to preserve county lines, which was a secondary goal. Like Iowa's good government map, the planned districts here achieve perfect population equality

¹ Dotted lines indicate previous district boundaries.

and are otherwise in compliance with federal and state law.

II. Evaluation of Relevant Criteria

A. Demographic Considerations

With Iowa's lack of racial diversity and the preexisting map's lines largely left intact, the demographics of these new districts generally remain consistent with those of the original ones.

B. Geographic Considerations

Adhering to preexisting district lines was the top priority in drawing this map. The resulting plan contains districts that largely resemble the preexisting ones, with the most significant change occurring in District 4 due to a decline in population. District 3, in contrast, lost geographic area due to population gains. All districts are contiguous and there are no unassigned areas.

C. Political Subdivisions

Of the 99 counties in Iowa, all but three counties, each split in two, are fully preserved under this plan. These numbers are very close to those of the preexisting plan's, in which no counties were split.

D. Communities of Interest

Of Iowa's 1,028 cities and towns, 1,015 are left whole in this proposed map. All of the 13 divided cities and towns were split in two, leaving a total of 26 splits overall. These numbers again resemble those of the preexisting plan's, in which 1,019 cities and towns were left intact and nine were split in two.

E. Partisan Considerations

According to the PlanScore Assessment² of this new plan, one district will be reliably Republican and three will lean Republican. Moreover, the efficiency gap and declination favor

² Available at https://drawcongress.org/wp-content/uploads/ia_lc_planscore.pdf.

Republicans in a strong majority of scenarios. This imbalance was an unintended consequence of minimizing changes to preexisting district lines.

III. Legal Compliance

A. One Person, One Vote

In 1964, the Supreme Court applied the principle of “one person, one vote” in *Wesberry v. Sanders*, holding that Article I, Section 2 of the United States Constitution commands that “one [person]’s vote in a congressional election is to be worth as much as another’s” to the extent practicable.³ In 1983, the Court further clarified in *Karcher v. Daggett* that, while precise mathematical equality may be impossible, even insignificant deviations in population between districts are unacceptable when avoidable and unjustified.⁴ In *Karcher*, the Court rejected the state of New Jersey’s argument that a population deviation of 0.7% between districts should be excused as *de minimis*.⁵

This plan complies with the “one person, one vote” requirement. As each district has a population of 797,592 people (plus or minus one person), there is essential perfect population equality.

B. Voting Rights Act

Section 2 of the Voting Rights Act disallows congressional maps that deny minority voters an equal opportunity to “participate in the political process and to elect representatives of their choice.”⁶ Under *Thornburg v. Gingles*, challenges to district lines on the basis of this provision must first pass a three-part test to prevail. First, the minority group must “demonstrate that it is sufficiently large and geographically compact to constitute a majority” in a district in the

³ *Wesberry v. Sanders*, 376 U.S. 1, 8 (1964).

⁴ *Karcher v. Daggett*, 462 U.S. 725, 734 (1983).

⁵ *Id.* at 732.

⁶ 52 U.S.C. §10301(b) (1982).

state; second, the minority group “must be able to show that it is politically cohesive”; third, the minority group “must be able to demonstrate that the white majority votes sufficiently as a bloc to enable it ... usually to defeat the minority’s preferred candidate”.⁷

As in the preexisting map, there are no majority-minority districts in this map due to Iowa’s low minority population. Accordingly, there should be no Section 2 claim.

C. *Shaw v. Reno*

Although Section 2 of the Voting Rights Act requires that states draw districts that provide minority groups a chance to elect their own candidates where feasible, the Supreme Court has also made it clear that districts drawn with race as the predominant factor must be evaluated with skepticism. In *Shaw vs. Reno*, the Court held that plaintiffs can be granted relief under the Equal Protection Clause when challenging a plan that is “so extremely irregular on its face that it rationally can be viewed only as an effort to segregate the races for purposes of voting, without regard for traditional districting principles and without sufficiently compelling justification.”⁸ Two years later, the Court further developed this idea, holding in *Miller v. Johnson* that strict scrutiny is triggered when the predominant factor motivating the drawing of district lines was race.⁹ Also in *Miller*, the Court determined that bizarrely-shaped districts may indicate that race was in fact the predominant factor.¹⁰

Without any majority-minority districts, there is also no reason to anticipate a *Shaw* claim.

D. Iowa State Law

Because the highest priority here was to shift district lines as little as possible, ensuring

⁷ *Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986).

⁸ *Shaw v. Reno*, 509 U.S. 630, 642 (1993).

⁹ *Miller v. Johnson*, 515 U.S. 900, 920 (1995).

¹⁰ *Id.* at 913.

that Iowa’s state Senate and House districts would be nested within the congressional ones was less of a focus. Nonetheless, many state Senate districts—37 out of 50—still are contained within a single congressional district.

IV. Comparison to the Approved Plan

While the districts in Iowa’s approved plan¹¹ may preserve more political subdivision lines, they stray further from preexisting lines than these proposed districts do, and appear to have sacrificed some compactness in the process.

V. Conclusion

This map was created with the goal of forming districts that achieve perfect population equality while keeping disruptions to old lines to a minimum. The plan deviates little from the prior plan and is legally defensible.

VI. Appendix

District Composition (Preexisting):

District	Population	Deviation	W-CVAP	B-CVAP	H-CVAP	%D ('20)	%R ('20)
1	780,180	-17,412	92.3%	3.6%	2.2%	48.3%	51.7%
2	785,353	-12,239	90.2%	3.7%	3.8%	48.0%	52.0%
3	858,974	61,382	89.4%	3.9%	3.8%	49.9%	50.1%
4	765,862	-31,730	92.4%	1.7%	3.7%	36.3%	67.7%

District Composition (Proposed):

District	Population	Deviation	W-CVAP	B-CVAP	H-CVAP	%D ('20)	%R ('20)
1	797,593	1	92.3%	3.7%	2.2%	48.5%	51.5%
2	797,592	0	90.3%	3.5%	3.8%	47.6%	52.4%
3	797,593	1	88.9%	4.1%	3.9%	50.8%	49.2%
4	797,591	-1	92.6%	1.6%	3.6%	36.2%	63.8%

¹¹ Available at https://gis.legis.iowa.gov/Plan2/Plan2Congress8x11_color_2021.pdf.

Measures of Compactness (Preexisting):¹²

District	Reock	Schwartz- berg	Alternate Schwartz- berg	Polsby- Popper	Population Polygon	Area/ Convex Hull	Population Circle	Ehren- burg
1	0.39	1.83	1.85	0.29	0.73	0.67	0.65	0.37
2	0.31	1.68	1.71	0.34	0.71	0.73	0.34	0.25
3	0.47	1.40	1.44	0.48	0.97	0.83	0.78	0.37
4	0.49	1.40	1.53	0.43	0.85	0.88	0.43	0.48
Mean	0.42	1.58	1.63	0.39	0.82	0.78	0.55	0.37

Measures of Compactness (Proposed):

District	Reock	Schwartz- berg	Alternate Schwartz- berg	Polsby- Popper	Population Polygon	Area/ Convex Hull	Population Circle	Ehren- burg
1	0.50	1.66	1.69	0.35	0.78	0.73	0.59	0.39
2	0.34	1.68	1.73	0.33	0.75	0.76	0.37	0.28
3	0.41	1.51	1.57	0.40	0.91	0.78	0.73	0.43
4	0.53	1.35	1.47	0.46	0.81	0.92	0.44	0.53
Mean	0.45	1.55	1.62	0.39	0.81	0.80	0.53	0.41

¹² Numbers closer to 1 indicate a higher degree of compactness.