

Louisiana

Between 2010 and 2020, Louisiana’s population increased by 2.7%¹ and became more diverse overall. It experienced relative population declines in rural areas in the north and relative growth in urban areas in the southern part of the state. As a share of the state population, the white population declined 6.3%, the share of the Black population increased by 3.8% and the share of the Hispanic population increased by 67.5%.²

In Louisiana, the state legislature is tasked with drawing plans, but they are subject to the Governor’s veto. Currently, the Governor’s mansion is controlled by a Democrat, John Bel Edwards, while the state legislature is controlled by Republicans. Republicans are two votes shy of the supermajority required to overturn a veto. In April 2021, a group of plaintiffs sued the state of Louisiana, challenging the current congressional districts as unconstitutionally malapportioned and arguing that it is inevitable that the legislature and Governor will fail to reach a compromise.³ The plaintiffs asked a state court in Louisiana to establish a timeline for adopting its own plan “in the near-certain event that the political branches will fail to timely do so.”⁴

This will also be the first redistricting process since the passage of the Voting Rights Act in which Louisiana’s congressional plan is not subject to preclearance. One key focus of the redistricting process will be whether Louisiana constructs a second majority-minority district. In 2018, voters brought a lawsuit against the state, alleging that African American voters had been packed into the state’s sole Black majority district, District 2,⁵ and that Section 2 requires the creation of a second Black majority district. The case was dismissed with prejudice in 2020, but the NAACP is leading civil rights groups in advocating for the creation of a second majority-African American district during the 2021-2022 redistricting process.⁶

In drawing plans for the state of Louisiana, I kept in mind Good Government redistricting principles and strove to increase the political representation of minority communities. To that end, I drew three plans. The first is a Least Change map that prioritizes keeping district lines as close as possible to the current district lines. I refer to this plan as **LA**, and districts in the plan as Districts **LA1 – LA6**.

¹ America Counts Staff, *Louisiana’s population was 4,657,757 in 2020*, UNITED STATES CENSUS BUREAU (Aug. 25, 2021) <https://www.census.gov/library/stories/state-by-state/louisiana-population-change-between-census-decade.html>.

² *Id.*

³ Petition for Injunctive and Declaratory Relief, English v. Ardoin, Case No. 2021-03538 (D. La. Apr. 26, 2021).

⁴ *Id.* at 2.

⁵ *Johnson v. Ardoin*, BRENNAN CTR. FOR JUST. (October 14, 2020), <https://www.brennancenter.org/our-work/court-cases/johnson-v-ardoin>.

⁶ Letter from the NAACP Legal Defense and Educational Fund, Inc., et al., to the Senate and House Governmental Affairs Committees of the Louisiana State Legislature (Oct. 18, 2021) (available at <https://bloximages.newyork1.vip.townnews.com/theadvocate.com/content/tncms/assets/v3/editorial/6/7b/67b44a58-3041-11ec-bfab-936d7d10591f/616dbd4a2a059.pdf.pdf>).

The other two maps are Good Government plans that create an additional majority-minority district. The first of the two plans creates two coalition districts⁷ where members of minority groups are in the majority of the Citizen Voting Age Population (CVAP).

I refer to this plan as **LB**, and districts in the plan as **LB1 – LB6**. Voters who identify as “any part” African American make up a plurality of voters in the two coalition districts in Plan B. I have also drawn a second plan where African American voters are the majority in two districts, consistent with the civil rights groups’ arguments that a plan that does not create two African-American majority districts violates Section 2 of the Voting Rights Act. I refer to this plan as **LC**, and districts in the plan as **LC1 – LC6**.

LA: Proposed “Least Change Map”

My goal with the Least Change Map was to adhere to the current district lines while improving the existing map’s adherence to the Parish lines wherever possible. My Least Change splits one fewer parish than the existing plan.

I made few changes to District 1, other than to move the existing district lines towards the west to adhere to the lines of St. Mary’s parish. I also moved the lines of District 3 and District 2, so that St. Mary’s parish and Terrebonne parish are now contained entirely in District 1. I also made a slight change to District 1’s lines in St. Bernard parish to equalize the population between District 1 and 2. This did not require splitting any additional parish lines beyond what the existing plan already split.

⁷ A coalition district is one where members of a minority group are not a majority of the relevant voting population but have the opportunity to elect a candidate of their choice with the help of another minority group. 29 C.J.S. § 99 (2021).

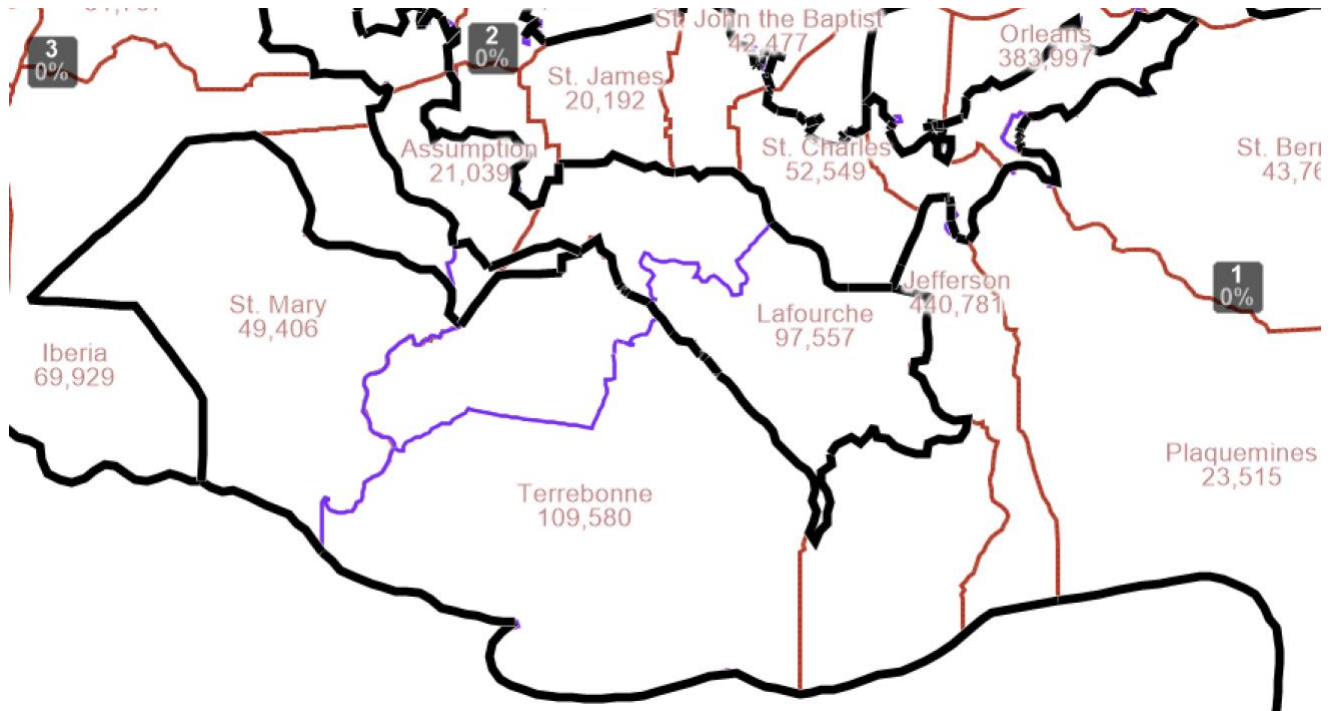


Figure 1 This is an image of the shifts of District 1

I made minor shifts to adjust the population to District 2. District 2 is a very irregularly shaped district that splits many parish lines. Where possible, I tried to align the district lines with the parish lines but erred on the side of keeping the original shape of the district to create a true least change map.

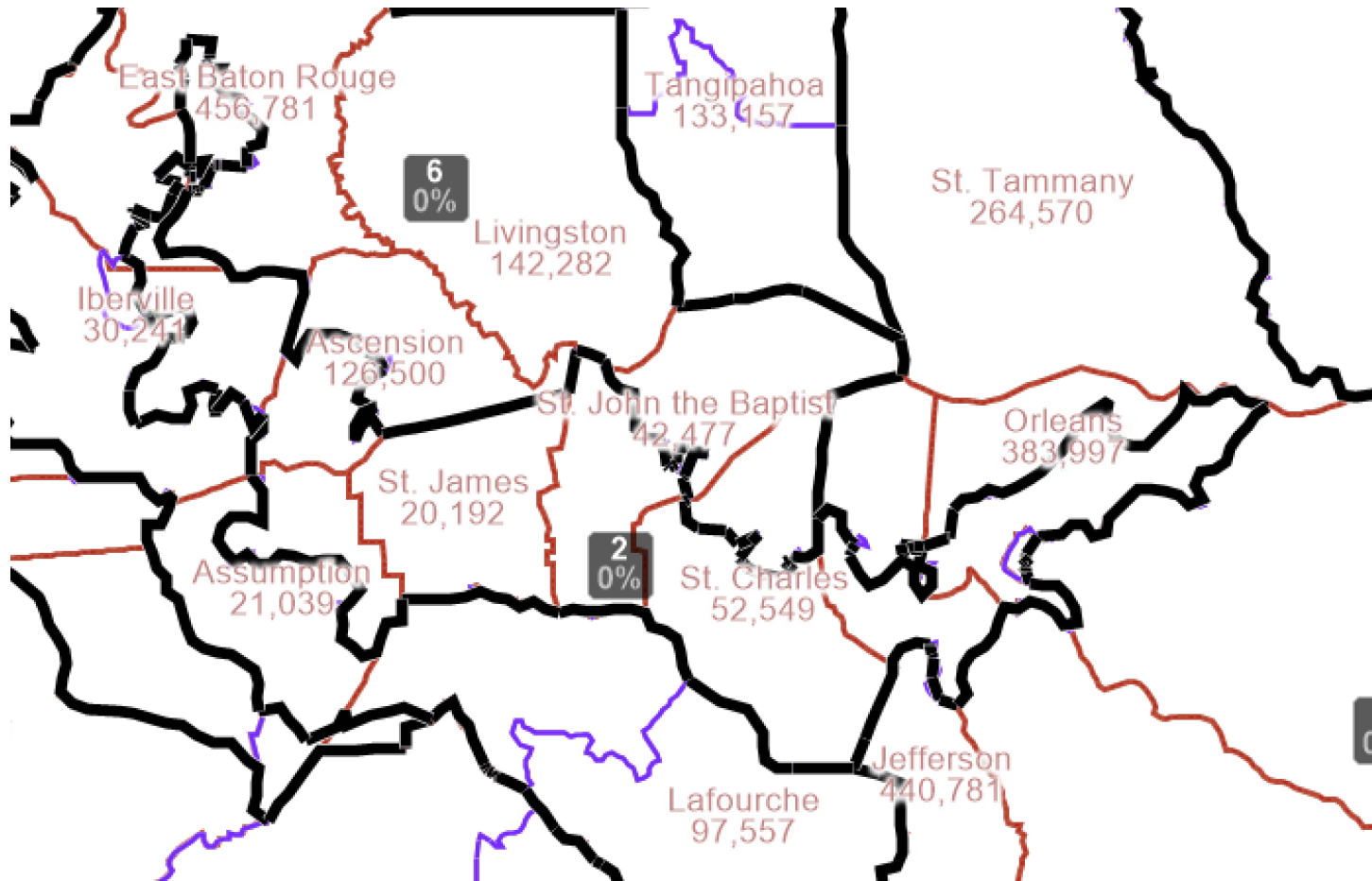


Figure 2 This is an image of the changes I made to District 2.

I made two major changes to District 4. First, District 4 now includes Lincoln County in North-central Louisiana. I did this so that I could subtract population from District 5 in order to align District 5's lines with the Pointe Coupee, West Feliciana, East Feliciana, St. Helena, and Tangipahoa parishes.

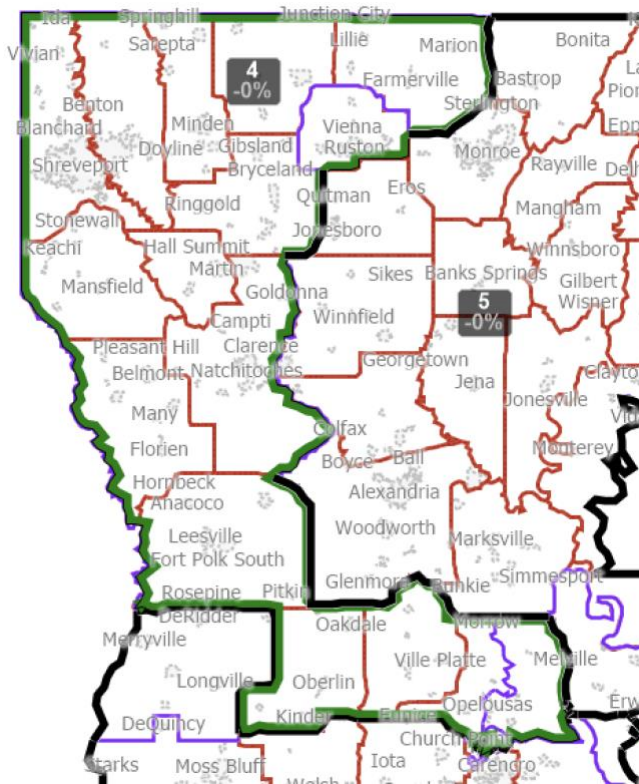


Figure 3 This is an image of changes to District 4 in the Louisiana Least Change map.

I shifted the lines of District 5 to the south because District 6, which contains New Orleans and Baton Rouge, experienced population growth over the last decade. District 6 had to shrink to reflect the population growth in the urban centers. District 5 had to grow, as it is made up of more rural communities that experienced a decline in their share of the population. District 5's lines now adhere to Pointe Coupee, East Feliciana, St. Helena, and Tangiaphoa parish lines.

To equalize the population between Districts 4 and 5, I had to split St. Landry parish. I split St. Landry parish in Melville and Krotz Springs, two small towns where I could trade off census blocks in order to reach population equality. The existing plan split St. Landry parish, and I tried to see whether it was possible to preserve St. Landry parish, but I came to the conclusion that it wasn't possible to both equalize the districts' population and keep the county intact.

The pre-existing District 6 split Iberville parish into multiple districts. I maintained that parish split and traded population at the census block level to equalize the population between District 3, 4, and 6. This involved splitting the towns of Rosedale and Grosse Tete into multiple districts.

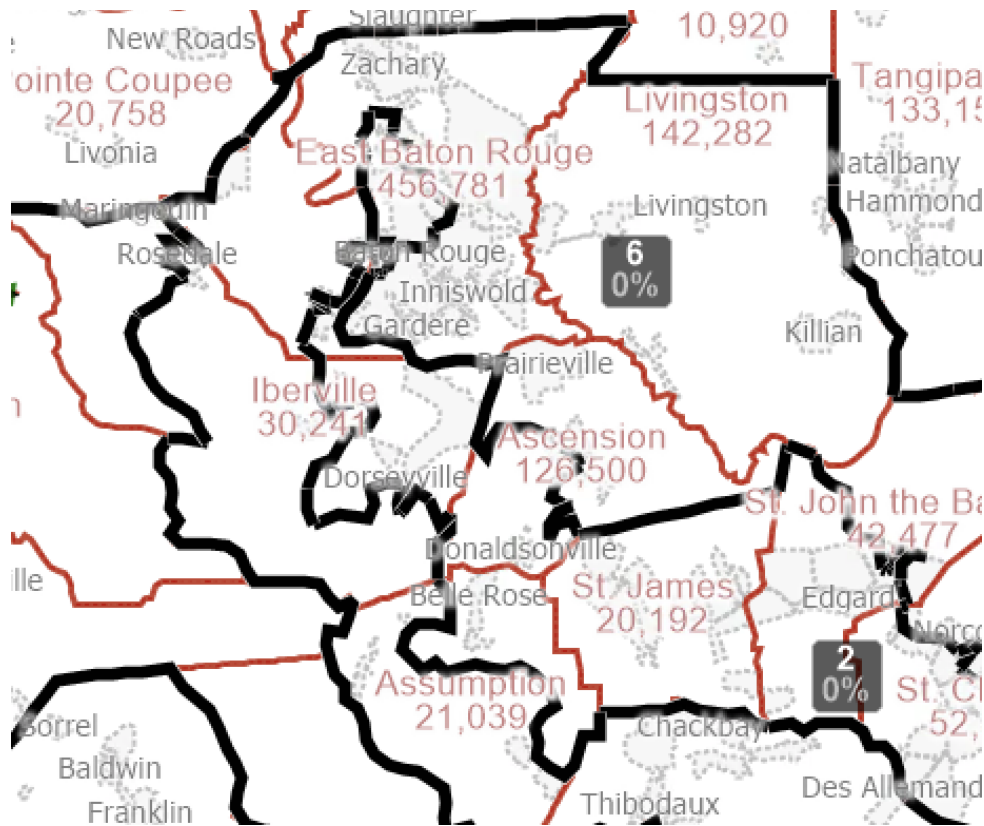


Figure 4 This is an image of the parish splits in District 6 of the Least Change Louisiana plan.

LB: “Coalition District Plan”

The second proposed plan, Plan LB, is a Good Government plan that improves upon the existing congressional plan in a number of respects, with more compact districts and respect for communities of interest. This plan does not create two districts where African Americans are the majority of the CVAP, but it enhances the representation of minority communities by creating two minority-opportunity districts where African Americans, Latinos, and Asian Americans can combine in a coalition to elect candidates of their choice.

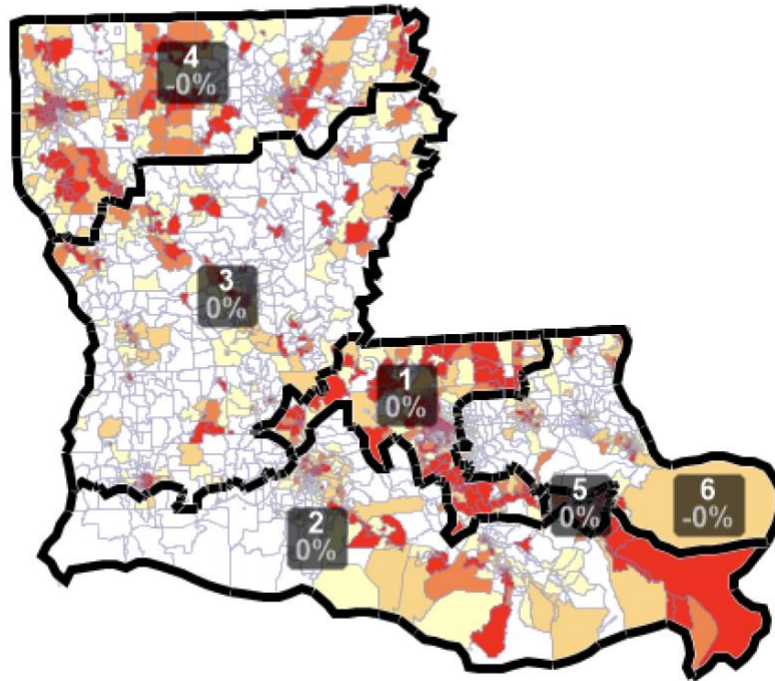


Figure 5 This is an image of Plan LB.

The pictures used in this section use a racial heatmap on the VTD layer, with red representing districts where the population is greater than 50% non-white, orange representing districts where the population is greater than 40% non-white, yellow representing districts where the population is greater than 30% non-white, and white representing districts where non-white voters make up less than 20% of the VTD population.

The first of the majority-minority coalition districts centers on Baton Rouge and stretches to encompass Opelousas and Livonia in the West and West Feliciana and East Feliciana counties in the North.

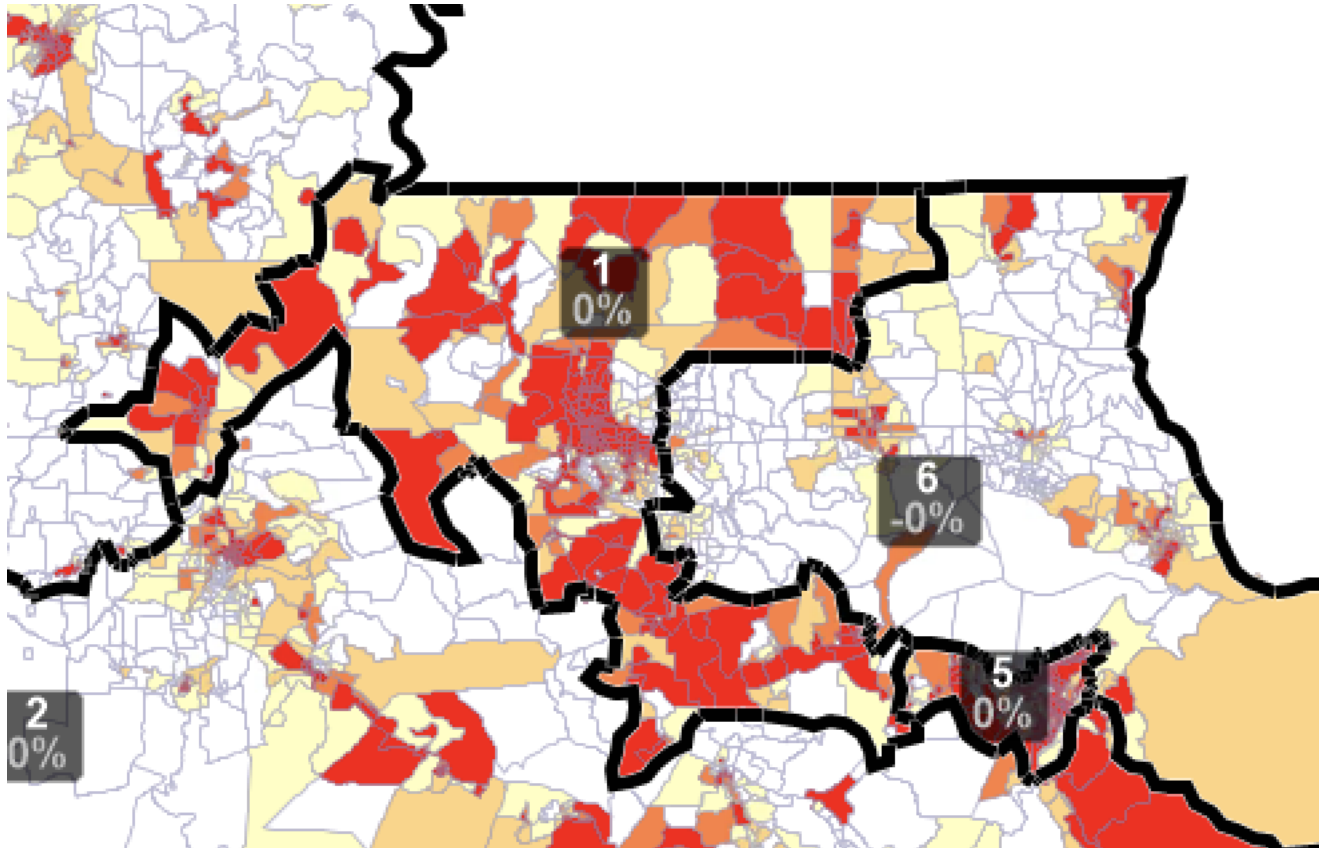


Figure 6 This is an image of the new proposed District LB1, under the “Coalition district” plan.

In the current map, minority communities surrounding Baton Rouge are cracked into what are Districts 5, 6, and 2.

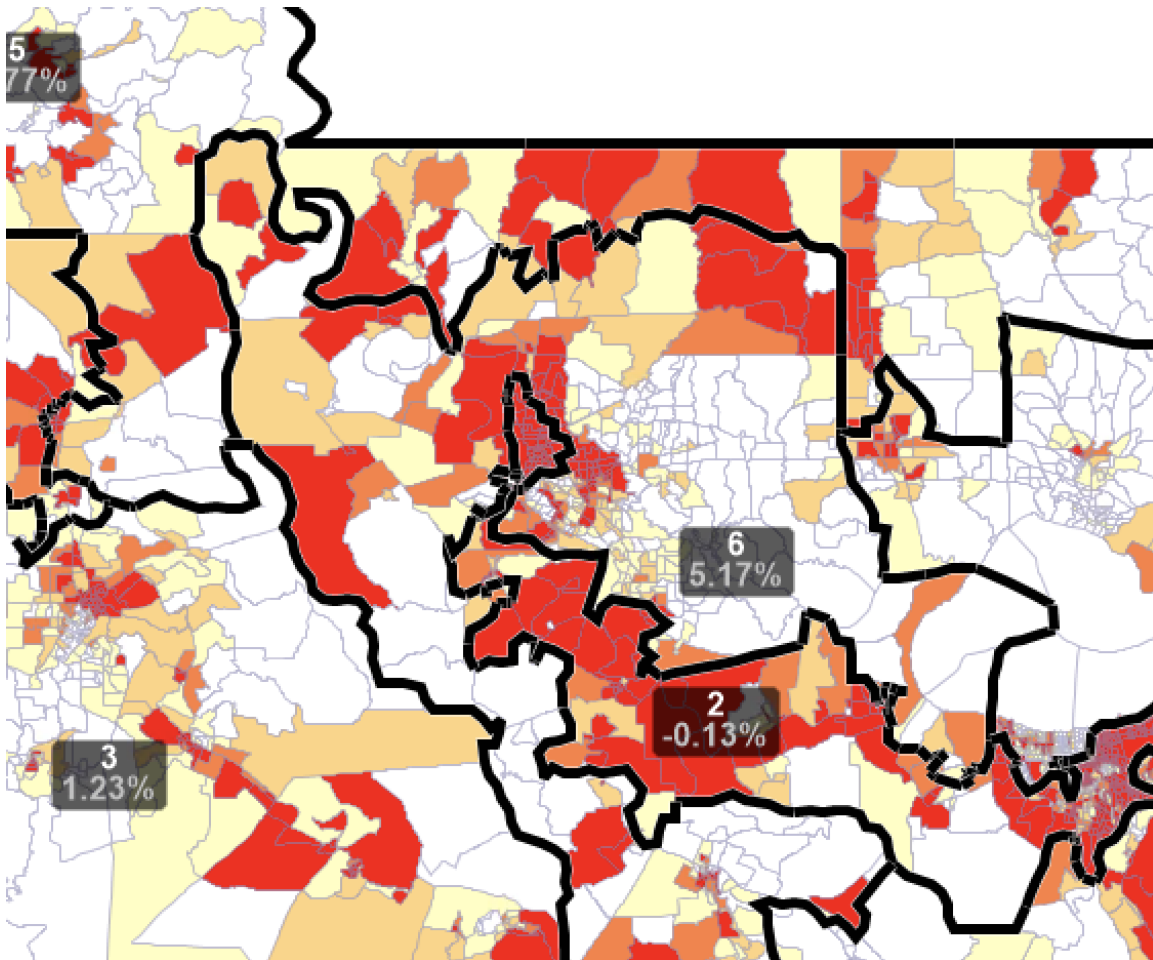


Figure 7 This is an image of the same heat map applied to the existing districts, which divide communities surrounding Baton Rouge into 3 districts.

Under the coalition district plan, the new District LB1 would connect African American communities in West Feliciana, East Feliciana, St. Helena, St. Landry, and Baton Rouge.

The second coalition district, District LB5, would be centered on New Orleans, as depicted below.

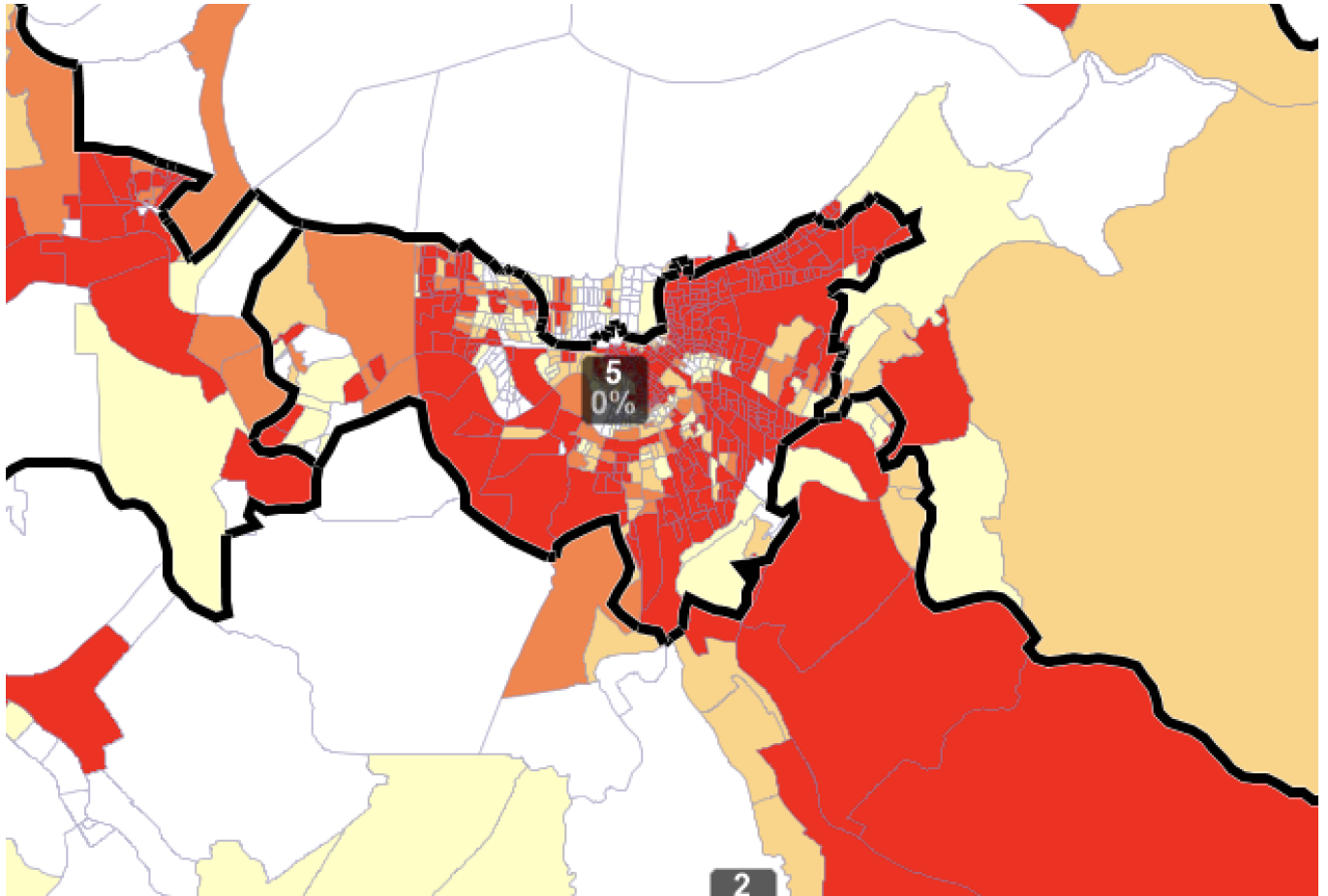


Figure 8 This is an image of District LB5 in the first of two Louisiana Good Government Plans.

LC: Two Black Majority Districts Plan

Finally, I have proposed a plan that creates two districts where African American voters are the majority of the CVAP. As I will discuss in more detail later in the paper, Section 2 of the Voting Rights Act likely requires the creation of two African American majority districts, as African Americans make up roughly one third of the population of Louisiana. This plan creates two districts centered on Baton Rouge and on New Orleans.

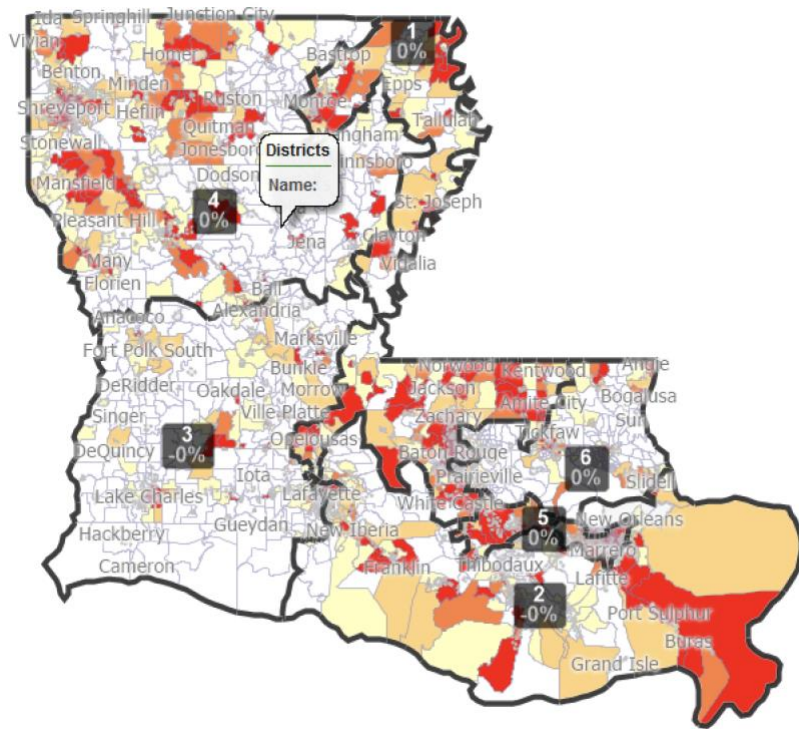


Figure 9 This is a statewide image of Plan LC with a racial heatmap described above applied.

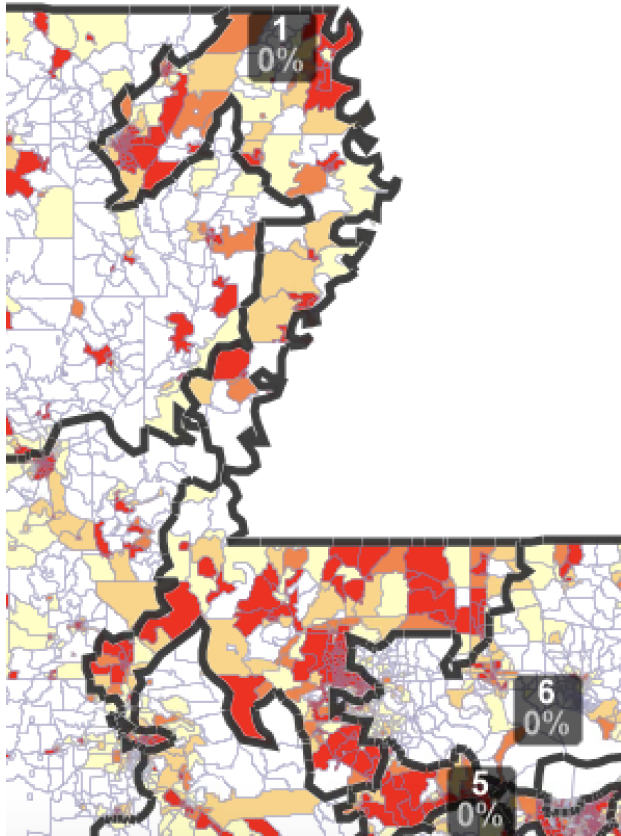


Figure 10 This image depicts the proposed district LC1, which connects communities in the Northeast corner of the state with Baton Rouge, and parts of Lafayette and Opelousas.

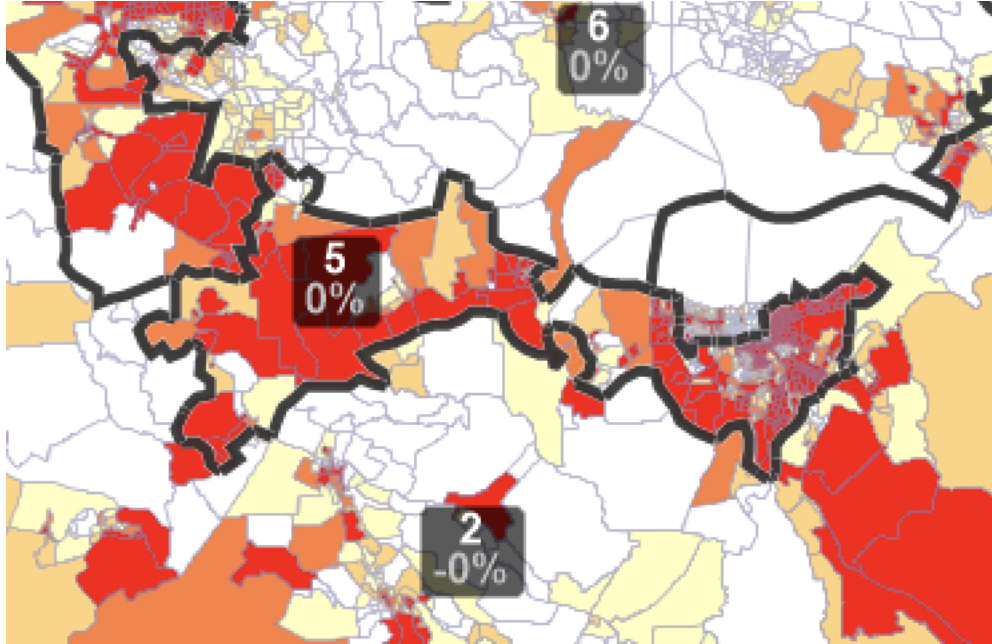


Figure 11 This image depicts the proposed second African American majority district, the proposed district LC5.

In the sections to come, I will discuss the merits and drawbacks of each of the plans, including an analysis of how these plans meet legal requirements.

Legal Compliance

Federal Requirements

One Person-One Vote

Article I §2 of the U.S. Constitution requires that congressional districts “be apportioned among the several States . . . according to their respective numbers. . . .”⁸ In *Karcher v. Daggett*, the Supreme Court held that any deviations from perfect population equality in congressional districts must be justified with respect to traditional districting principles, including respect for political subdivisions, compactness, and avoiding contests between incumbents.⁹ Therefore, a population deviation of 0% is the gold standard in drawing congressional district lines. All three of my proposed plans adhere to the requirement of perfect population equality across districts. Louisiana’s total population as of the 2020 census was 4,657,757. Louisiana did not lose or gain any districts, so divided over the existing six districts, this creates a new ideal value of 776,293 voters. All districts in all three plans deviate from the ideal by no more than one person.

⁸ U.S. Const. Art. I § 2.

⁹ *Karcher v. Daggett*, 462 U.S. 725, 740 (1983).

Shaw v. Reno

In *Shaw v. Reno*, the Supreme Court held that a plaintiff could challenge a redistricting plan under the 14th Amendment's Equal Protection Clause based on the harm caused by the legislature's decision to use race as the predominant factor in drawing the plan.¹⁰ A plan that violates *Shaw*, therefore, is one that cannot be understood as anything other than a plan designed to separate voters on the basis of race. A plan that uses race as the predominant factor in redistricting will trigger strict scrutiny and can only be upheld if the defendants prove that the redistricting plan was narrowly tailored to avoid a violation of the Voting Rights Act.¹¹ In *Miller v. Johnson*, the Court held that a strange shape is not the only question or even a threshold question in proving whether racial factors predominated, although it can be used as circumstantial evidence.¹²

There is some basis for a *Shaw* claim against the Least Change plan (LA). The argument for a *Shaw* claim would probably focus on either proposed District 2 or proposed District 6, which have strange shapes and low Polsby-Popper compactness scores below of .06 and .07, respectively. A plaintiff arguing for a *Shaw* violation would likely point out that the fact that African American voters are packed into District 2, where they constitute 61% of the CVAP, is evidence that race was the predominant factor motivating the plan. A defender of the plan would argue that both of these districts' shapes can be explained with reference to the need to comply with the Section 2 of the Voting Rights Act. The plaintiff could argue that the districts are not narrowly tailored, and that they could have been drawn such that African American voters made up a smaller majority, closer to 51% of the CVAP of District 2. A state need not draw "control" districts where minorities are guaranteed to elect their candidate of choice, it only needs to draw a district where voters of a particular minority group are greater than 50% of the CVAP to comply with the Voting Rights Act.¹³ Therefore, it may be possible to raise a *Shaw* claim against the Least Change Plan.

Plan LB may be vulnerable to a *Shaw* claim if the court does not accept that majority-minority coalition districts are required under the Voting Rights Act. This plan increases the average compactness scores of districts in the plan relative to the existing plan on multiple popular measures, including the Polsby-Popper measure, the Ehrenburg compactness measure, and the Schwartzburg measure. However, District LB1 has a strange shape, and District LB5 clearly excludes the predominantly white New Orleans neighborhoods of Bucktown, Lakeview, and Bonnabel Place. Given the circuit split regarding whether Section 2 requires the

¹⁰ *Shaw v. Reno*, 509 U.S. 630, 649 (U.S. 1993).

¹¹ The Supreme Court has assumed, without deciding that compliance with the Voting Rights Act is a compelling interest. *See Shaw v. Hunt*, 517 U.S. 899, 916 (1996).

¹² *Miller v. Johnson*, 515 U.S. 900, 913 (1995).

¹³ *See Bartlett v. Strickland*, 556 U.S. 1, 20 (2009).

creation of coalition districts,¹⁴ a court may find that the districts do not satisfy Louisiana's requirements under the Voting Rights Act and therefore that the districts were not narrowly tailored to comply with the VRA. As I will discuss in more detail below, whether Section 2 could require the creation of a majority-minority district (but not a majority African American district) is an open question in redistricting law.

A *Shaw* claim is unlikely to succeed against Plan LC because it has been specifically tailored to avoid a violation of the Voting Rights Act. A plaintiff pursuing a *Shaw* claim against Plan LC will likely focus on the strange shapes of District LC1 as evidence of a *Shaw* violation. Compared to the existing plan, however, these districts are not significantly less compact according to the Polsby-Popper measure of compactness. LC1, the district that extends from the Northeast corner of the state to Baton Rouge, has a Polsby-Popper score of .04. While this is the lowest score in the LC plan, it is only slightly below the lowest Polsby-Popper score in the existing plan (0.06). While a low compactness score can be evidence of intent to create districts using race as the predominant factor, low compactness scores are tolerated when the districts are narrowly tailored to comply with the Voting Rights Act (VRA). I will discuss in greater detail in the next section why these districts comply with the VRA.

Section 2 of the Voting Rights Act

Section 2 of the Voting Rights Act is violated if members of minority groups "have less opportunity than other members of the electorate to participate in the political process and elect representatives of their choice."¹⁵ Under *Thornburg v. Gingles*, a plaintiff challenging a redistricting plan must satisfy a three-pronged test.¹⁶ First, the plaintiff must show that the minority group is sufficiently large and compact to constitute a majority in a single-member district. Second, the minority group must be politically cohesive. Third, the plaintiff must demonstrate that the white majority votes sufficiently as a bloc to enable it usually to defeat the minority's preferred candidate.

Once these three prongs of the *Gingles* test have been met, the court must consider whether the factors detailed in a report by the Senate Judiciary Committee that accompanied the 1982 amendments to the Voting Rights Act are also present.¹⁷

¹⁴ The Western District of Texas's discussion of whether § 2 requires the creation of coalition districts in a recent redistricting case is informative. Summarizing its discussion of whether the creation of coalition districts can satisfy a state's responsibility under the Voting Rights Act, it wrote, ". . . [T]he Supreme Court has not addressed coalition districts, the Fifth Circuit has expressly permitted them, and the and the Second, Ninth, and Eleventh Circuits have tacitly recognized them. Only the Sixth Circuit has expressly denied § 2 protection to a combined group of minorities under the first *Gingles* requirement." *Perez v. Abbott*, 250 F. Supp. 3d 123, 139 (W.D. Tex. 2017).

¹⁵ 52 U.S.C. 10301.

¹⁶ *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986).

¹⁷ See S. Rep. No. 97-417, 97th Cong., 2d Sess. (1982), at 28-29.

The court must examine whether, based on the totality of circumstances, members of the minority group have less opportunity than other members of the electorate to participate in the political process and elect candidates of their choice.¹⁸

Civil rights advocates in Louisiana are asking the state legislature to create a second majority-African American district to comply with Section 2 of the Voting Rights Act, especially given that the 2020 census showed an increase in the share of African American and non-white voters in the state. African Americans make up nearly a third (31.8%) of the CVAP of the state of Louisiana. Under the rough proportionality standard that the Supreme Court employed in *Johnson v. De Grandy*,¹⁹ African Americans should be entitled to a majority in roughly two of the state's six districts. This suggests that the Plan LA does not survive scrutiny under Section 2 of the Voting Rights Act because it contains only one district where the majority of the CVAP is African American.

In Louisiana, the primary challenge for a plaintiff bringing a Section 2 claim to support the creation of a second majority African American district would be to show that the first prong of *Gingles* has been met. The other two prongs of *Gingles* should be relatively easy for plaintiffs to meet. African Americans are politically cohesive and overwhelmingly support Democratic candidates. Exit polls in the 2020 presidential election revealed that 88% of African Americans voted for Joe Biden while 77% of white voters voted for Donald Trump.²⁰ As recently as 2020, in *Louisiana State Conference of NAACP v. Louisiana*, plaintiffs successfully proved the existence of racially polarized voting patterns in statewide gubernatorial elections.²¹

¹⁸ The totality of the circumstances inquiry examines: (1) The history of official voting-related discrimination in the state or political subdivision; (2) The extent to which voting in the elections of the state or political subdivision is racially polarized; (3) The extent to which the state or political subdivision has used voting practices or procedures that tend to enhance the opportunity for discrimination against the minority group, such as unusually large election districts, majority-vote requirements, and prohibitions against bullet-voting; (4) The exclusion of members of the minority group from the candidate slating processes; (5) The extent to which the minority group members bear the effects of discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process; (6) The use of overt or subtle racial appeals in political campaigns; (7) And the extent to which members of the minority group have been elected to public office in the jurisdiction.

¹⁹In *Johnson v. De Grandy*, the Supreme Court held that no voting rights act violation could be found in a plan where minority members formed effective voting majorities in a number of districts that was roughly proportional to the minority voters' respective shares of the population. *See Johnson v. De Grandy*, 512 U.S. 997, 1000 (1994). While proportionality is not dispositive of a claim under § 2, it is a rule of thumb that can be helpful in assessing whether a plan complies with the VRA. *See id.*

²⁰ *Louisiana Voter Surveys: How Different Groups Voted*, THE NEW YORK TIMES <https://www.nytimes.com/interactive/2020/11/03/us/elections/ap-polls-louisiana.html> (last accessed Jan. 16, 2022).

²¹ *NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020).

The Senate factors are also present in Louisiana. Louisiana has a long history of voting discrimination that has been recognized by federal courts.²² African Americans in Louisiana are faced with a racially segregated school system²³ and experience lower life expectancy, lower incomes, and worse health outcomes compared to white residents of Louisiana.²⁴

The question is whether plaintiffs could successfully meet the first prong: that the members of the minority district are sufficiently compact to form the majority of the CVAP in a district. Plan LC demonstrates that it is possible to create two districts in Louisiana where African Americans are the majority of the CVAP. To do this requires creating a very long and non-compact district connecting the Northeastern part of the state with the northern suburbs of Baton Rouge, as seen in the picture below.

²² See *e.g.*, *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1116 (1986) (“It would take a multi-volumed treatise to properly describe the persistent, violent, intimidation visited by white citizens upon black efforts to participate in the political process.”)

²³ *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 442-43 (M.D. La. 2017).

²⁴ JC Canicosa, *Black Louisiana residents are worse off than White Louisiana residents, report finds*, LOUISIANA ILLUMINATOR (Nov. 21, 2020) <https://lailluminator.com/2020/11/21/black-louisiana-residents-are-worse-off-than-white-louisiana-residents-report-finds/>.

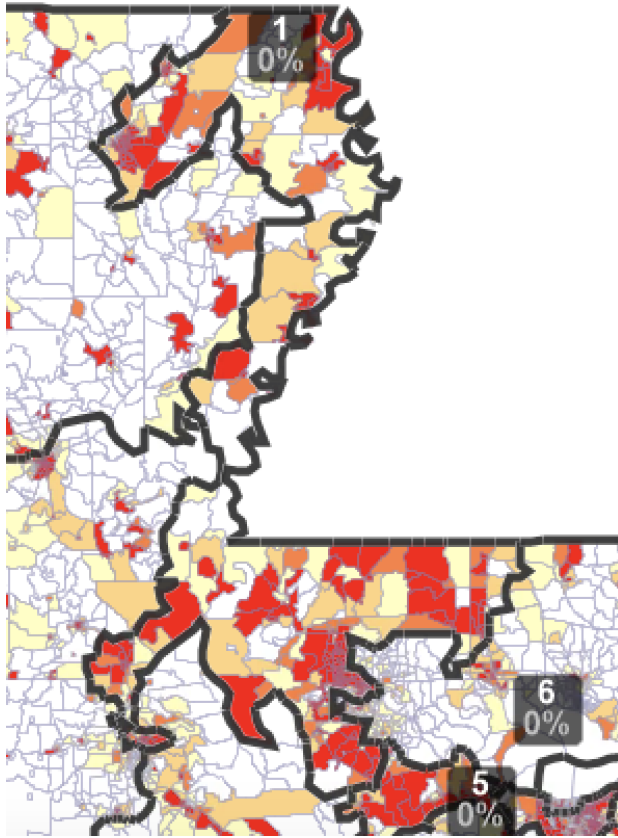


Figure 12 This is an image of proposed District LC1 which is 51% Black CVAP (50.71% BVAP)..

Proposed District LC1 connects communities north of Baton Rouge and in Lafayette with Monroe and Brownsville-Bacombille in the northeast corner of the state. Non-Hispanic African Americans make up 51.7% of the CVAP of this district. It has a Polsby-Popper compactness score of .04, the lowest of any of the proposed districts in Louisiana. By comparison, the corresponding district in the existing plan, what is currently District 5, has a Polsby-Popper compactness score of .10. The other majority African American district in Plan LC is LC5. It is 50.4% NH Black CVAP (47.51% BVAP) and has a Polsby-Popper compactness score of .10. This is actually an increase in compactness compared to the corresponding sole majority-African American district in the existing plan, which has a Polsby-Popper compactness score of only .06.

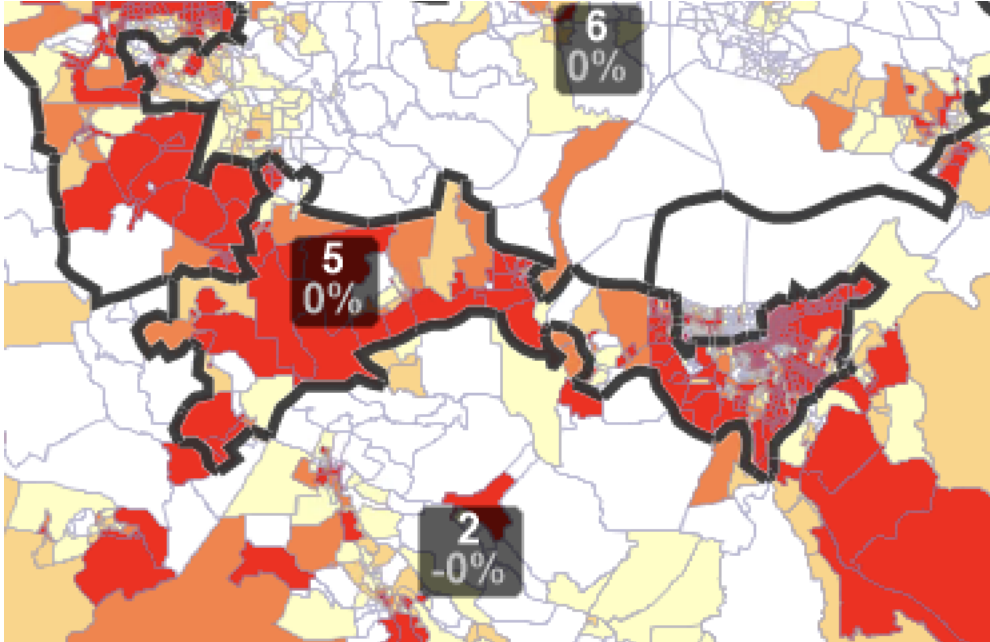


Figure 13 This is an image of the proposed District LC5, which is 50.4% Black CVAP (47.51% BVAP).

Given the low compactness score of the second African American majority district, it's possible that a court would find that African Americans are not sufficiently compact to constitute the majority of a second district. As I will discuss in greater detail in the section on compactness, the Coalition District plan LB, performs better in terms of compactness. Therefore, if a court accepts that coalition districts could be required by the Voting Rights Act, it may find that non-white communities are sufficiently compact to constitute a majority of the CVAP and order the creation of a minority-majority Section 2 coalition district.

A PlanScore analysis²⁵ suggests that the difference between Plan LB and Plan LC in terms of minorities' ability to elect their preferred candidate may not be significant. African Americans in Louisiana vote heavily Democratic, and the PlanScore analysis indicates that both LB and LC would result in one tossup district and one solidly Democratic district. This means in either case, African Americans would have a similar ability to elect their preferred candidate. Under either plan, they would have a better ability to elect their preferred candidate than in the Least Change plan, which includes five solidly Republican districts and only one Democratic district. The PlanScore metrics suggest that there may not be much difference between Plans LB and LC in terms of enhancing representation for African Americans.

State Requirements

²⁵ PlanScore analyses for my proposed Louisiana plans can be found on the Louisiana plan pages at www.DrawCongress.org.

The Louisiana state constitution does not list any requirements for congressional maps to be added to the federal requirements. However, in 2011, the state legislative committee adopted principles to guide the redistricting process.²⁶ These guidelines state that all districts must be equal in population. The legislature will not consider a plan that exceeds “plus or minus five percent of the ideal population.” All redistricting plans must have a population that is as close to the ideal population as practicable. The districts also must be contiguous and respect the “recognized political boundaries and natural geography of the state, to the extent practicable.” The legislature also mandates that “due consideration” be given to the existing districts. Finally, all redistricting plans must comply with the Fourteenth and Fifteenth Amendments to the U.S. Constitution and the Voting Rights Act.

All three plans comply with the state legislature’s requirements for population equality. As I have discussed, there is no de minimus population deviation across my plans. The greatest population deviation of any plan is one person. All of the districts are also fully contiguous. There is one district in each plan, including the existing plan, that is contiguous by water, but this is unavoidable given the geographic realities and not forbidden under Louisiana law.

Plan LA gives the most respect to existing district boundaries, but as I have discussed, this plan may be out of step with Voting Rights Act requirements as it fails to provide proportional representation to the African American community. However, because it likely does not comply with federal voting rights law, it may not comply with these state requirements.

Plan LB increases the average compactness scores of the districts relative to the existing plan. Plan LC splits the most political subdivisions of any of the proposed plans and has the lowest minimum compactness scores of any of the plans, but is perhaps the only plan that complies with the Voting Rights Act.

Because it seems likely that only Plans LB and LC comply with federal voting requirements, they are also the only ones that would meet the requirements set forth by the Louisiana legislature.

Other traditional districting principles

Contiguity

All districts in all three plans are fully contiguous. Many of the districts are contiguous only by water, but this is acceptable under Louisiana state law and perhaps unavoidable in a state like Louisiana that is on the coast and has an abundance of waterways.

²⁶ LA. S. COMM. GOV’T AFF., COMMITTEE RULES FOR REDISTRICTING (2011) <https://senate.la.gov/redist2011/Documents/rules.pdf>.

Compactness

Plans LB and LC generally improve upon the average compactness scores relative to both the least change plan and the existing plan. Across all three of the most popular measures for compactness, either plan LB or LC is more compact on average than either the existing plan or the least change.

Under the Reock standard, which measures the ratio of the area of the district to the area of a minimum bounding circle that encloses the district’s geography, Plan LC is the most compact on average. Plan LC has an average Reock score of .39, a minimum of .20, and a maximum of .60. The existing plan is the next most compact, with an average score of .36, a minimum of .18, and a maximum of .46. Plan LB is the next most compact according to this measure, with an average score of .34, a minimum of .20, and a maximum of .41. Plan LA is the least compact, with an average Reock compactness score of .32, a minimum of .18, and a maximum of .39.

Under the Schwartzburg measure of compactness, which analyzes the ratio of the perimeter of the district to the circumference of a circle whose area is equal to the area of the district, Plan LB is the most compact.²⁷ Plan LB has an average score of 2.16, a minimum score of 1.64, and a maximum score of 2.91. The next most compact plan, according to this measure, is Plan LC, which has an average score of 2.52, a minimum of 1.76, and a maximum of 4.24. The existing plan is next, with an average of 2.64, a minimum of 1.57, and a maximum of 3.85. Plan LA is the least compact of the plans, with an average Schwartzburg score of 2.68, a minimum of 2.01, and a maximum of 3.85.

The Polsby-Popper measure of compactness is the ratio of the area of the district to the area of a circle whose circumference is equal to the perimeter of the district. According to this measure, Plan LB is the most compact, with has an average compactness score of .18, a minimum of .10, and a maximum of .28. Plan LC has an average Polsby-Popper score of .15, a minimum of .04, and a maximum of .22. The existing plan has an average Polsby-Popper score of .15, a minimum of .06, and a maximum of .32. Plan LA is the least compact plan, with an average compactness score of .13, a minimum of .06, and a maximum of .19. Under all three measures, Plans LB and LC are the two most compact plans.

I have summarized these results in a table below:

Compactness Scores									
Plan	Min Reock	Average Reock	Max Reock	Min Polsby-Popper	Avg. Polsby-Popper	Max Polsby-Popper	Min Schwartzburg	Schwartzburg	Max Schwartzburg

²⁷ Unlike the other compactness metrics discussed in this paper, lower Schwartzberg scores indicate a more compact plan.

				Popp er	Popp er	Popp er			
LA	.18	.32	.39	.06	.13	.19	2.01	2.68	3.85
LB	.20	.34	.41	.10	.18	.28	1.64	2.16	2.91
LC	.20	.39	.60	.04	.15	.22	1.76	2.52	4.24
Exist ing	.18	.36	.46	.06	.15	.32	1.57	2.64	3.85

Political Subdivision Splits

Plan LA splits the fewest parishes of any plan I have proposed, with 14 parish splits. The existing congressional plan splits 15 parishes. Plan LB splits 18 parishes and 72 voting districts. Plan LC splits 26 parishes but only splits 24 voting districts.

Political Subdivision Splits		
Plan	Split Parishes	Split VTDs
LA	14	61
LB	18	72
LC	26	24
Existing	15	43

Communities of interest

Louisiana has five cultural regions. North Louisiana is home to Shreveport, a predominantly Black city known as a national center of the oil industry and as the cultural center of the Ark-La-Tex region, where Arkansas, Louisiana, and Texas meet. Central Louisiana, called “the Crossroads,” is another predominantly rural area that includes larger cities of Alexandria and Natchitoches. This region is known for its mix of French, Spanish, African-American, Anglo-American and Native American cultures. Acadiana, the Southwest portion of the state, is home to most of the state’s Cajun or Francophone population. The Florida Parishes, which border the Mississippi River, are eight parishes that were part of West Florida in the 18th and early 19th centuries and are home to many antebellum mansions. Finally, the Greater New Orleans area is known for its nightlife, French and Spanish Creole architecture, distinctive music, festivals, and unique dialects.

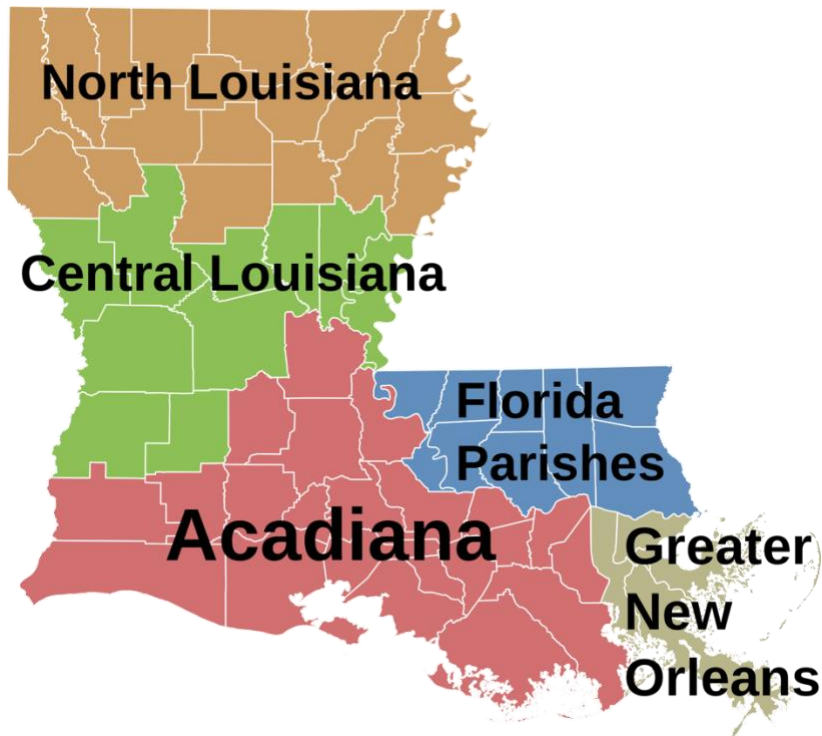


Figure 14 Source: Wikimedia Commons

Plan LB keeps these cultural regions intact to a greater extent than any of the other plans, including the existing plan.



Figure 15 Plan LB keeps communities of interest intact to the greatest extent of all the plans, including the existing one.

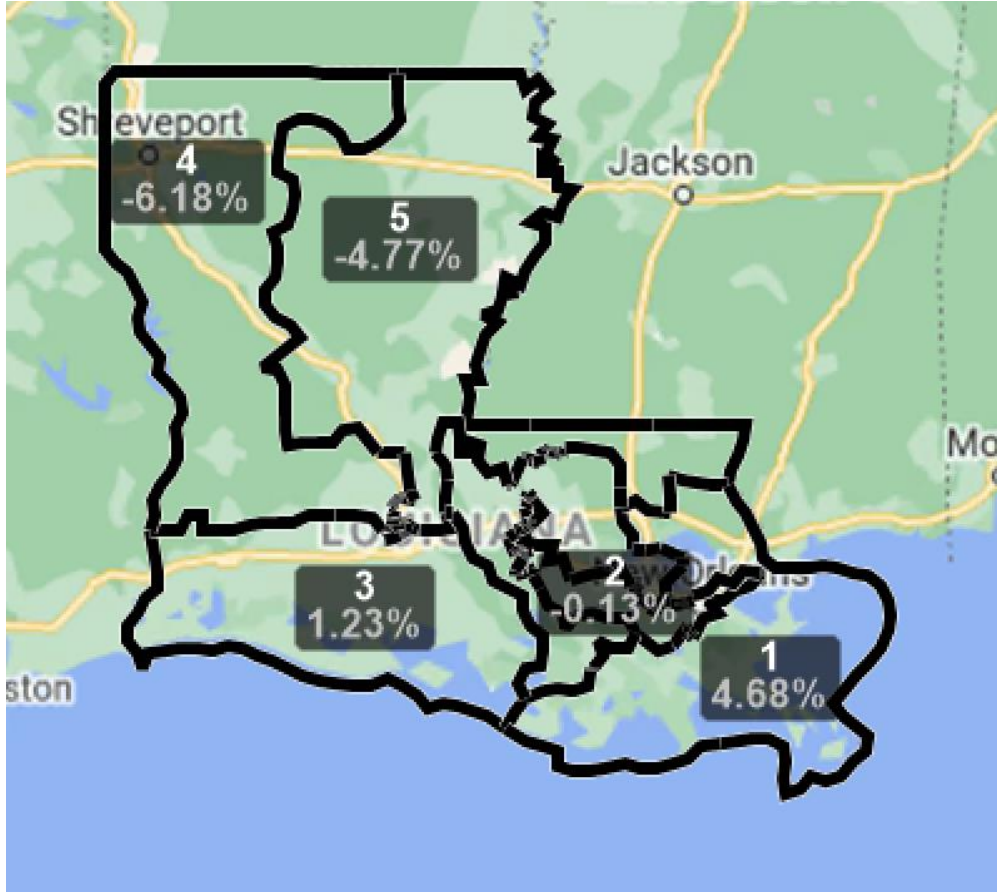


Figure 16 An image of the existing plan, which unnecessarily splits the Florida Parishes, Northern Louisiana, and Crossroads communities of interest.

Under the existing plan, District 5 connects disparate communities of interest in Northern Louisiana, Central Louisiana, and parts of the Florida Parishes. The Florida Parishes are split into three districts: District 5, District 6, and District 2. Greater New Orleans is split across three districts, District 6, 2, and 1. Only Acadiana is kept relatively intact in District 3.

LB, by contrast, divides Northern and Central Louisiana into distinct districts. District LB1 encompasses most of the Florida Parishes region. Greater New Orleans is divided into LB5, LB6 and LB2, while LB2 captures most of Acadiana. LB3 captures the Crossroads, and LB4 includes Northern Louisiana.

Plan LC is less respectful of communities of interest in order to create the second African American majority district. It divides Northern Louisiana into two districts and combines Acadiana and Central Louisiana into one district. Under this plan, the Florida parishes are connected in the same district as parts of Northern Louisiana.

Under all three proposed plans and the existing plan, Greater New Orleans is divided into three districts.

Partisan considerations

The existing plan in Louisiana includes five seats that are safe Republican and one, the sole African American majority district, that is safe for Democrats.

Plan LA keeps this partisan arrangement intact, but LB and LC would change the political landscape of the state. Under both plans, the African American majority district encompassing most of New Orleans would continue to be a Democratic stronghold, but both plans would create a new “Lean Democratic” district. In LB, the lean district, LB1, has a predicted vote share of 51% D-49% R. In LC, the new lean district is LC1 and has a slightly higher predicted Democratic vote share of 54% D-46% R. Both plans would better reflect the partisan breakdown of the state and likely lead to greater representation for minorities in the congressional delegation.

Partisan Breakdown				
Plan	Strong Democratic districts	Lean Democrat Districts	Lean Republican Districts	Strong Republican Districts
LA	1	0	0	5
LB	1	1	0	4
LC	1	1	0	4
Existing	1	0	0	5

Key Tradeoffs

In drawing these plans, the most challenging tradeoffs I faced involved the competing concerns of complying with the Voting Rights Act and the U.S. Constitution. I also struggled keep counties intact while complying with the One Person-One Vote.

In presenting three possible plans for Louisiana, I have shown the different tradeoffs that one must make when prioritizing different districting principles. Assuming that a court would accept it as compliant with the Voting Rights Act, the Coalition District plan is the best from a Good Government perspective. It improves on many of the existing districts’ average compactness measures. Although it divides more political subdivisions than the existing plan, it creates greater opportunities for members of minority groups to elect their candidates of choice. Given that the Louisiana Census data showed a decline in the white population of Louisiana and a corresponding increase in the non-white populations, it seems increasingly untenable for Louisiana to continue to maintain a plan with only one majority-minority district.

Conclusion

In this paper, I explored different facets of the central choice facing the Louisiana state legislature: whether to draw an additional African American-

majority district. Given the continued presence of racially polarized voting and the long history of discrimination, it appears likely that the state legislature will need to draw a district similar to one of the plans I have proposed for increasing minority representation. These concerns need to be balanced with the demands of other traditional redistricting principles, including respect for political subdivisions, respect for communities of interest, compactness and contiguity, and partisan fairness. Given that the Democratic Governor of Louisiana has the power to veto the Republican state legislature's plans, map drawers in Louisiana may actually be forced to come to a compromise that satisfies many of these criteria. I have drawn plans that are reasonably successful at balancing these competing concerns. Overall, my Good Government plan, Plan LB, performs the best across metrics typically used to evaluate redistricting plans. Hopefully, my exploration of these issues in this paper can serve as a guide to help the public better understand the redistricting process.