

Plan Evaluation Form

Plan Type: Congress - Public Submissions

Plan Name: NAACPLDF Coalition CD Plan A5 v2

Plan Submitted By:

Question	Response/Quantify or Explain if necessary
If a statewide plan (House, Senate, PSC, BESE, Congress, or Supreme Court), does the plan assign all the geography of the state?	Yes
Is each district within the plan composed of contiguous geography?	Yes (See attachment - Compactness Report)
If a House, Senate, PSC, BESE, or Congressional Plan, is the plan comprised of single-member districts? For House and Senate Plans, give the # of districts if less than the current number.	Yes (See attachment - Plan Statistics)
What is the overall deviation of the plan?	Absolute=2 Relative=0% (See attachment - Plan Statistics)
How many majority-minority districts are contained within the plan? List each minority district, quantify by type of protected class, list Tot Pop %, VAP %, Vot Reg %, and describe where in the state each minority district is located.	2 (See attachment - District Population)
How many parishes are split in the plan? Please list. Include any explanation given for each split.	22 (See attachment - Split Parishes)
How many municipalities are split in the plan? Please list. Include any explanation given for each split.	28 (See attachment - Split Places)
How many VTDs (precincts) are split in the plan?	42 (See attachment - Split VTDs)
If there are split VTD's, are they split using visible census tabulation boundaries?	See other observations
Please list each split VTD by Parish and VTD in alpha and numeric order and include the number of districts each VTD is split into and also specify the district numbers. Include any explanation given for each split.	See attachment - Split VTDs
Any other observations regarding the plan?	

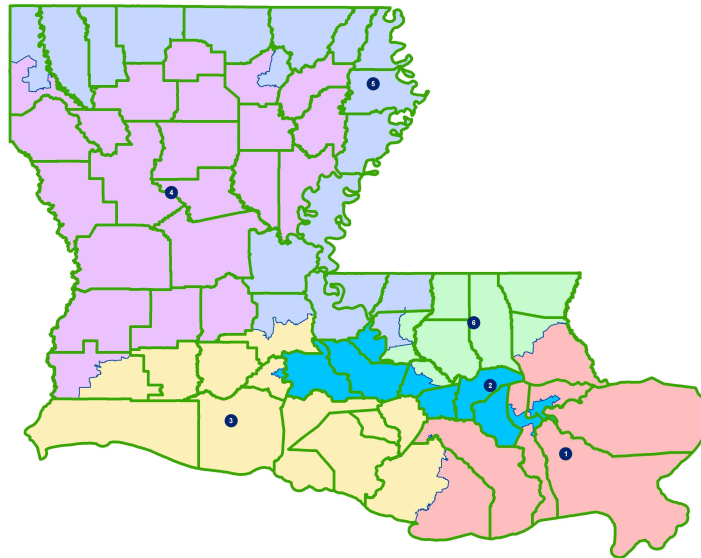
Snapshot Report

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Compactness Report

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District	Part	Area (sq miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	8864.71	758.51	0.1936	0.4957	2.27	0
District 2	1	2886.23	534.95	0.1267	0.2104	2.81	0
District 3	1	9895.01	752.02	0.2199	0.3318	2.13	0
District 4	1	16930.05	1164.37	0.1569	0.4445	2.52	0
District 5	1	10486.3	1545.09	0.0552	0.2121	4.26	0
District 6	1	3340.44	373.02	0.3017	0.4204	1.82	0

Plan Statistics

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	776,292	776,292	0	0.000%
District 2	1	776,292	776,292	0	0.000%
District 3	1	776,293	776,292	1	0.000%
District 4	1	776,293	776,292	1	0.000%
District 5	1	776,294	776,292	2	0.000%
District 6	1	776,293	776,292	1	0.000%
Grand Total:	6	4,657,757	4,657,752		
Ideal Population Per Member:	776292				
Number of Districts for Plan Type:	6				
Range of District Populations:	776,292	to	776,294		
Absolute Mean Deviation:	0				
Absolute Range:	0	to	2		
Absolute Overall Range:	2				
Relative Mean Deviation:	0.00%				
Relative Range:	0.00%	to	0.00%		
Relative Overall Range:	0.00%				

District Population

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Jefferson	265,712	166,234	39,643	13,256	41,634	52,123	211,339	138,599	28,801	10,022	30,197	37,136	162,607	123,413	18,122	21,072
Lafourche	97,481	71,679	15,826	1,023	4,741	5,662	74,567	56,819	11,059	736	3,187	3,734	58,247	48,447	7,155	2,647
Orleans	81,960	60,249	11,724	3,130	5,856	9,084	68,366	50,820	9,747	2,447	4,534	7,472	57,601	43,917	7,602	6,082
Plaquemines	23,515	14,287	5,428	1,317	1,786	2,236	17,334	10,856	3,857	925	1,196	1,377	13,908	9,513	3,134	1,261
St. Bernard	43,764	24,497	12,309	1,381	4,630	6,010	31,775	18,992	7,944	982	3,169	4,028	25,653	18,233	5,497	1,923
St. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany	185,247	130,434	33,221	4,506	12,933	15,233	142,005	103,582	22,958	3,202	9,180	10,420	122,684	95,793	18,068	8,814
Terrebonne	78,613	50,338	15,218	1,344	4,613	5,618	58,998	40,002	10,262	950	3,074	3,579	44,344	33,018	7,542	3,785
District 1	776,292	517,718	133,369	25,957	76,193	95,966	604,384	419,670	94,628	19,264	54,537	67,746	485,044	372,334	67,120	45,584
	100.000%	66.691%	17.180%	3.344%	9.815%	12.362%	100.000%	69.438%	15.657%	3.187%	9.024%	11.209%	80.254%	76.763%	13.838%	9.398%
District 2																
Ascension	43,219	19,325	19,793	591	2,895	3,547	31,631	14,955	13,895	409	1,935	2,340	27,668	13,940	12,353	1,378
Iberville	30,241	14,833	13,730	202	1,202	1,418	24,086	12,462	10,232	149	1,022	1,187	20,462	10,132	9,897	433
Jefferson	175,069	54,701	86,574	9,768	21,285	26,934	133,315	45,536	63,374	7,670	14,620	18,348	100,494	36,203	51,454	12,837
Lafayette	32,910	6,504	25,088	173	927	1,165	25,127	5,724	18,544	130	596	746	21,272	4,108	16,306	858
Orleans	302,037	66,213	207,245	9,726	16,188	21,933	237,830	59,432	156,321	8,073	11,874	15,684	198,643	48,069	133,923	16,651
St. Charles	52,549	33,550	13,928	837	3,309	4,141	39,541	26,154	9,890	529	2,301	2,737	34,985	24,309	8,797	1,879
St. James	20,192	9,973	9,762	60	315	343	15,505	7,883	7,297	31	230	237	14,966	7,254	7,501	211
St. John the Baptist	42,477	13,877	25,196	403	2,536	3,291	32,503	11,622	18,437	323	1,771	2,210	28,913	10,219	17,234	1,460
St. Martin	50,399	31,974	15,908	590	1,422	1,635	38,250	25,187	11,282	402	996	1,113	34,127	22,955	10,380	792
West Baton Rouge	27,199	14,307	11,170	287	1,109	1,244	20,526	11,146	8,149	209	803	871	17,141	9,937	6,865	339
District 2	776,292	265,257	428,394	22,637	51,188	65,651	598,314	220,101	317,421	17,925	36,148	45,473	498,671	187,126	274,710	36,838
	100.000%	34.170%	55.185%	2.916%	6.594%	8.457%	100.000%	36.787%	53.053%	2.996%	6.042%	7.600%	83.346%	37.525%	55.088%	7.387%
District 3																
Acadia	57,573	44,478	10,863	238	1,421	1,641	42,942	34,071	7,382	173	916	1,026	37,678	30,555	6,407	716
Assumption	21,039	13,722	6,220	96	743	914	16,616	11,145	4,707	57	510	631	14,439	9,700	4,510	229
Calcasieu	186,194	114,248	56,304	4,474	8,381	10,048	140,542	89,578	39,852	3,193	5,849	6,707	103,276	70,360	28,177	4,751
Cameron	5,617	5,232	125	30	155	197	4,358	4,100	79	23	109	130	4,789	4,610	88	91
Iberia	69,929	39,206	24,556	2,123	3,250	3,897	52,791	31,295	17,069	1,562	2,284	2,657	44,526	28,287	14,352	1,887
Jefferson Davis	32,250	25,066	5,837	183	692	734	24,039	19,121	4,006	111	476	489	20,013	16,350	3,202	461
Lafayette	208,843	146,859	40,048	6,281	12,663	14,818	158,748	115,884	27,373	4,534	8,703	10,083	132,221	104,537	20,175	7,509
Lafourche	76	31	29	2	2	10	52	19	18	2	2	9	31	20	9	0
St. Landry	55,672	36,108	17,083	391	1,563	1,758	41,652	28,100	11,886	269	1,021	1,089	36,142	24,666	10,472	1,005
St. Martin	1,368	1,285	13	7	29	44	1,154	1,091	11	5	17	31	993	979	1	13
St. Mary	49,406	26,949	15,991	835	3,961	4,524	37,521	21,594	11,520	593	2,641	2,954	30,210	18,712	9,891	1,607

District Population

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District 3																
Terrebonne	30,967	19,596	7,929	399	1,506	1,740	23,507	15,629	5,534	289	1,015	1,122	17,376	12,377	4,024	974
Vermilion	57,359	44,477	8,810	1,447	2,002	2,296	43,012	34,363	5,787	1,037	1,337	1,496	36,769	30,505	4,994	1,270
District 3	776,293	517,257	193,808	16,506	36,368	42,621	586,934	405,990	135,224	11,848	24,880	28,424	478,463	351,658	106,302	20,513
	100.000%	66.632%	24.966%	2.126%	4.685%	5.490%	100.000%	69.171%	23.039%	2.019%	4.239%	4.843%	81.519%	73.497%	22.217%	4.287%
District 4																
Acadia	3	2	1	0	0	0	1	0	1	0	0	0	0	0	0	0
Allen	22,750	16,327	4,490	246	740	1,893	17,510	12,751	3,275	182	656	1,755	12,201	9,478	2,217	506
Avoyelles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Beauregard	36,549	29,529	4,649	402	917	1,271	27,489	22,304	3,495	269	648	828	22,294	18,771	2,369	1,154
Bienville	12,980	6,950	5,600	57	167	211	10,072	5,486	4,284	30	111	141	8,847	4,843	3,917	87
Bossier	741	462	163	57	45	61	657	433	115	54	42	55	310	228	60	22
Caddo	107,027	74,319	23,284	3,107	3,931	4,544	84,307	60,524	16,754	2,310	2,844	3,132	70,794	53,801	13,014	3,977
Calcasieu	30,591	25,524	3,082	228	1,008	1,336	22,624	19,211	2,046	166	667	863	17,235	15,299	1,336	588
Caldwell	9,645	7,646	1,632	51	166	221	7,478	5,969	1,224	46	123	163	6,031	5,124	818	89
Catahoula	8,906	5,776	2,395	46	570	614	6,951	4,557	1,736	33	538	558	6,467	4,639	1,770	58
Claiborne	10	0	10	0	0	0	7	0	7	0	0	0	5	3	2	0
De Soto	26,812	15,284	9,973	117	698	762	20,440	11,909	7,425	86	463	495	18,713	11,330	6,810	573
Evangeline	32,350	21,354	9,235	241	1,240	1,336	24,408	16,460	6,483	187	1,061	1,111	20,553	14,566	5,643	344
Franklin	19,774	12,492	6,802	70	205	276	15,028	9,901	4,779	44	151	183	13,159	9,015	4,034	110
Grant	22,169	17,709	3,335	133	348	1,333	17,527	13,964	2,717	97	242	1,179	12,688	11,174	1,176	338
Jackson	15,031	9,967	4,166	175	468	468	11,783	7,967	3,125	140	377	372	9,449	6,647	2,610	192
La Salle	14,791	11,348	1,422	283	1,366	1,402	11,563	8,636	1,065	264	1,327	1,325	8,792	7,978	637	177
Lincoln	48,396	26,034	19,364	892	1,444	1,754	38,655	21,306	15,119	744	960	1,187	25,649	15,672	9,016	961
Natchitoches	37,515	19,361	15,725	255	1,313	1,490	29,349	16,010	11,415	198	1,043	1,140	23,107	12,850	9,224	1,033
Ouachita	87,948	67,794	13,573	1,597	3,029	3,185	66,872	52,759	9,335	1,149	2,092	2,080	55,901	47,533	6,317	2,051
Rapides	130,023	77,510	42,592	2,428	4,391	5,090	98,792	61,373	30,205	1,786	3,094	3,442	80,176	52,832	23,775	3,569
Red River	7,620	4,195	3,106	25	123	188	5,714	3,338	2,164	3	93	113	5,631	3,130	2,418	83
Richland	20,002	11,748	7,599	83	314	400	15,356	9,312	5,545	66	230	293	13,636	8,453	4,952	231
Sabine	22,155	15,036	3,861	94	441	710	17,064	12,054	2,655	66	319	502	14,547	11,023	2,184	1,340
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vernon	48,750	35,087	7,611	1,442	3,010	4,175	36,261	26,765	5,133	1,074	2,129	2,740	24,060	19,182	3,011	1,867
Winn	13,755	8,594	3,727	210	961	1,023	10,906	6,932	2,695	170	902	941	8,406	5,988	2,292	126
District 4	776,293	520,048	197,397	12,239	26,895	33,743	596,814	409,921	142,797	9,164	20,112	24,598	478,651	349,559	109,602	19,476
	100.000%	66.991%	25.428%	1.577%	3.465%	4.347%	100.000%	68.685%	23.927%	1.535%	3.370%	4.122%	80.201%	73.030%	22.898%	4.069%

District 5

District Population

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 5																
Avoyelles	39,693	25,625	11,678	434	1,189	1,485	30,578	20,269	8,311	379	1,049	1,257	23,426	16,534	6,294	598
Bienville	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
Bossier	128,005	80,590	32,388	3,435	8,333	10,176	95,219	62,498	22,325	2,394	5,538	6,564	69,433	50,633	14,778	4,022
Caddo	130,821	29,138	96,020	927	3,282	3,837	98,100	24,535	69,605	698	2,179	2,486	80,502	19,312	58,235	2,957
Catahoula	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Claiborne	14,160	7,263	6,350	88	274	479	11,500	6,258	4,817	55	230	403	8,593	4,629	3,818	146
Concordia	18,687	10,275	7,725	122	332	459	14,217	8,108	5,613	100	229	310	11,964	7,222	4,540	202
East Baton Rouge	174,914	26,847	139,050	1,809	6,173	7,339	131,080	22,358	102,294	1,366	4,262	5,024	109,844	18,511	87,349	3,986
East Carroll	7,459	2,054	5,272	29	61	115	5,901	1,773	4,043	19	39	80	4,709	1,306	3,359	44
East Feliciana	19,539	11,516	7,341	91	329	391	16,183	9,740	5,918	61	266	317	13,600	7,959	5,186	455
Madison	10,017	3,475	6,363	20	100	204	7,435	2,906	4,391	9	81	149	7,278	2,494	4,674	110
Morehouse	25,629	12,281	12,484	160	334	381	20,062	10,095	9,300	117	271	292	16,922	8,505	8,131	286
Ouachita	72,420	20,751	47,644	1,191	2,128	2,473	53,328	17,215	32,955	969	1,667	1,866	43,851	12,982	29,341	1,528
Pointe Coupee	20,758	12,395	7,504	107	593	625	16,250	10,108	5,502	91	430	429	14,675	9,320	5,121	234
Richland	41	37	4	0	0	0	27	26	1	0	0	0	26	17	9	0
St. Landry	26,868	7,503	18,753	108	395	420	20,159	6,109	13,611	84	280	285	18,340	5,427	12,533	379
Tensas	4,147	1,744	2,312	23	42	67	3,235	1,446	1,728	12	26	46	3,455	1,503	1,917	35
Union	21,107	14,460	5,224	62	1,023	1,135	16,632	11,807	3,861	39	671	709	15,221	11,066	3,692	463
Webster	36,967	22,735	12,679	208	658	688	28,753	18,144	9,464	154	433	434	22,737	14,938	7,339	460
West Carroll	9,751	7,894	1,425	27	225	325	7,532	6,223	1,010	20	143	192	7,038	5,913	1,040	85
West Feliciana	15,310	10,883	3,740	89	373	651	12,783	9,283	2,951	56	319	572	7,407	5,092	2,180	135
District 5	776,294	307,466	423,956	8,930	25,844	31,250	588,975	248,901	307,700	6,623	18,113	21,415	479,021	203,363	259,536	16,125
	100.000%	39.607%	54.613%	1.150%	3.329%	4.026%	100.000%	42.260%	52.243%	1.124%	3.075%	3.636%	81.331%	42.454%	54.181%	3.366%
District 6																
Ascension	83,281	61,816	12,423	1,709	5,944	6,836	60,326	46,181	8,244	1,105	3,843	4,321	52,249	42,860	6,461	2,925
East Baton Rouge	281,867	169,222	74,348	14,616	19,989	23,212	224,532	141,523	54,496	11,233	14,333	16,515	169,420	119,721	37,326	12,371
East Feliciana	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Livingston	142,282	116,855	12,658	1,697	7,961	8,791	105,141	88,432	8,136	1,099	5,163	5,390	84,568	76,062	5,425	3,081
St. Helena	10,920	4,527	6,031	39	189	216	8,463	3,805	4,371	28	150	149	8,321	3,628	4,565	128
St. Tammany	79,323	66,207	5,422	1,268	4,919	5,611	60,223	51,039	3,803	873	3,430	3,890	56,095	49,931	3,074	3,099
Tangipahoa	133,157	81,336	41,879	1,474	6,014	7,242	101,491	65,205	29,217	1,100	4,142	4,840	76,256	52,912	20,525	2,819
Washington	45,463	29,943	13,434	216	1,134	1,410	34,951	23,743	9,732	154	761	901	27,587	18,835	8,102	650
District 6	776,293	529,906	166,195	21,019	46,150	53,318	595,127	419,928	117,999	15,592	31,822	36,006	474,496	363,949	85,478	25,073
	100.000%	68.261%	21.409%	2.708%	5.945%	6.868%	100.000%	70.561%	19.828%	2.620%	5.347%	6.050%	79.730%	76.702%	18.014%	5.284%
Grand Total	4,657,757	2,657,652	1,543,119	107,288	262,638	322,549	3,570,548	2,124,511	1,115,769	80,416	185,612	223,662	2,894,346	1,827,989	902,748	163,609
	100.000%	57.059%	33.130%	2.303%	5.639%	6.925%	100.000%	59.501%	31.249%	2.252%	5.198%	6.264%	81.062%	63.157%	31.190%	5.653%

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Split Parishes

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District 1																
Jefferson	265,712	166,234	39,643	13,256	41,634	52,123	211,339	138,599	28,801	10,022	30,197	37,136	162,607	123,413	18,122	21,072
Lafourche	97,481	71,679	15,826	1,023	4,741	5,662	74,567	56,819	11,059	736	3,187	3,734	58,247	48,447	7,155	2,647
Orleans	81,960	60,249	11,724	3,130	5,856	9,084	68,366	50,820	9,747	2,447	4,534	7,472	57,601	43,917	7,602	6,082
St. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany	185,247	130,434	33,221	4,506	12,933	15,233	142,005	103,582	22,958	3,202	9,180	10,420	122,684	95,793	18,068	8,814
Terrebonne	78,613	50,338	15,218	1,344	4,613	5,618	58,998	40,002	10,262	950	3,074	3,579	44,344	33,018	7,542	3,785
District 2																
Ascension	43,219	19,325	19,793	591	2,895	3,547	31,631	14,955	13,895	409	1,935	2,340	27,668	13,940	12,353	1,378
Jefferson	175,069	54,701	86,574	9,768	21,285	26,934	133,315	45,536	63,374	7,670	14,620	18,348	100,494	36,203	51,454	12,837
Lafayette	32,910	6,504	25,088	173	927	1,165	25,127	5,724	18,544	130	596	746	21,272	4,108	16,306	858
Orleans	302,037	66,213	207,245	9,726	16,188	21,933	237,830	59,432	156,321	8,073	11,874	15,684	198,643	48,069	133,923	16,651
St. James	20,192	9,973	9,762	60	315	343	15,505	7,883	7,297	31	230	237	14,966	7,254	7,501	211
St. Martin	50,399	31,974	15,908	590	1,422	1,635	38,250	25,187	11,282	402	996	1,113	34,127	22,955	10,380	792
District 3																
Acadia	57,573	44,478	10,863	238	1,421	1,641	42,942	34,071	7,382	173	916	1,026	37,678	30,555	6,407	716
Calcasieu	186,194	114,248	56,304	4,474	8,381	10,048	140,542	89,578	39,852	3,193	5,849	6,707	103,276	70,360	28,177	4,751
Lafayette	208,843	146,859	40,048	6,281	12,663	14,818	158,748	115,884	27,373	4,534	8,703	10,083	132,221	104,537	20,175	7,509
Lafourche	76	31	29	2	2	10	52	19	18	2	2	9	31	20	9	0
St. Landry	55,672	36,108	17,083	391	1,563	1,758	41,652	28,100	11,886	269	1,021	1,089	36,142	24,666	10,472	1,005
St. Martin	1,368	1,285	13	7	29	44	1,154	1,091	11	5	17	31	993	979	1	13
Terrebonne	30,967	19,596	7,929	399	1,506	1,740	23,507	15,629	5,534	289	1,015	1,122	17,376	12,377	4,024	974
District 4																
Acadia	3	2	1	0	0	0	1	0	1	0	0	0	0	0	0	0
Avoyelles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bienville	12,980	6,950	5,600	57	167	211	10,072	5,486	4,284	30	111	141	8,847	4,843	3,917	87
Bossier	741	462	163	57	45	61	657	433	115	54	42	55	310	228	60	22
Caddo	107,027	74,319	23,284	3,107	3,931	4,544	84,307	60,524	16,754	2,310	2,844	3,132	70,794	53,801	13,014	3,977
Calcasieu	30,591	25,524	3,082	228	1,008	1,336	22,624	19,211	2,046	166	667	863	17,235	15,299	1,336	588
Catahoula	8,906	5,776	2,395	46	570	614	6,951	4,557	1,736	33	538	558	6,467	4,639	1,770	58
Claiborne	10	0	10	0	0	0	7	0	7	0	0	0	5	3	2	0
Ouachita	87,948	67,794	13,573	1,597	3,029	3,185	66,872	52,759	9,335	1,149	2,092	2,080	55,901	47,533	6,317	2,051
Richland	20,002	11,748	7,599	83	314	400	15,356	9,312	5,545	66	230	293	13,636	8,453	4,952	231
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 5																

Split Parishes

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 5																
Avoyelles	39,693	25,625	11,678	434	1,189	1,485	30,578	20,269	8,311	379	1,049	1,257	23,426	16,534	6,294	598
Bienville	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
Bossier	128,005	80,590	32,388	3,435	8,333	10,176	95,219	62,498	22,325	2,394	5,538	6,564	69,433	50,633	14,778	4,022
Caddo	130,821	29,138	96,020	927	3,282	3,837	98,100	24,535	69,605	698	2,179	2,486	80,502	19,312	58,235	2,957
Catahoula	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Claiborne	14,160	7,263	6,350	88	274	479	11,500	6,258	4,817	55	230	403	8,593	4,629	3,818	146
East Baton Rouge	174,914	26,847	139,050	1,809	6,173	7,339	131,080	22,358	102,294	1,366	4,262	5,024	109,844	18,511	87,349	3,986
East Feliciana	19,539	11,516	7,341	91	329	391	16,183	9,740	5,918	61	266	317	13,600	7,959	5,186	455
Ouachita	72,420	20,751	47,644	1,191	2,128	2,473	53,328	17,215	32,955	969	1,667	1,866	43,851	12,982	29,341	1,528
Richland	41	37	4	0	0	0	27	26	1	0	0	0	26	17	9	0
St. Landry	26,868	7,503	18,753	108	395	420	20,159	6,109	13,611	84	280	285	18,340	5,427	12,533	379
District 6																
Ascension	83,281	61,816	12,423	1,709	5,944	6,836	60,326	46,181	8,244	1,105	3,843	4,321	52,249	42,860	6,461	2,925
East Baton Rouge	281,867	169,222	74,348	14,616	19,989	23,212	224,532	141,523	54,496	11,233	14,333	16,515	169,420	119,721	37,326	12,371
East Feliciana	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany	79,323	66,207	5,422	1,268	4,919	5,611	60,223	51,039	3,803	873	3,430	3,890	56,095	49,931	3,074	3,099

Split Places

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Jefferson																
Kenner	56,025	28,221	9,486	3,563	13,763	17,162	43,536	23,243	6,793	2,679	10,080	12,358	32,050	20,138	4,658	7,260
Marrero	4,000	1,705	1,643	279	322	423	2,999	1,432	1,071	223	229	288	2,500	1,431	777	297
Metairie	141,509	93,628	16,853	6,709	21,920	27,307	113,338	78,548	12,186	5,040	15,752	19,358	85,849	69,949	6,106	9,790
River Ridge	11,276	9,505	562	206	845	1,084	9,222	7,876	441	150	639	793	8,603	7,839	238	529
Orleans																
New Orleans	81,960	60,249	11,724	3,130	5,856	9,084	68,366	50,820	9,747	2,447	4,534	7,472	57,601	43,917	7,602	6,082
St. Tammany																
Covington	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mandeville	13,192	10,894	707	433	937	1,028	10,392	8,771	503	277	678	718	9,204	8,197	349	660
Terrebonne																
Bayou Blue	2,527	1,720	226	13	370	435	1,839	1,363	111	7	221	241	1,355	1,165	93	104
Bayou Cane	13,355	8,963	2,780	234	617	781	9,905	7,041	1,778	158	436	522	7,374	5,792	1,099	486
Houma	32,576	19,611	8,191	607	1,998	2,386	24,760	15,787	5,699	415	1,412	1,630	18,873	13,167	4,388	1,331
District 2																
Ascension																
Gonzales	11,161	3,996	5,683	117	1,156	1,477	8,393	3,330	4,033	93	787	991	6,527	2,749	3,341	445
Prairieville	359	273	63	11	8	13	279	224	45	3	4	7	270	215	42	15
Sorrento	1,504	1,088	264	15	108	111	1,109	817	191	11	69	71	1,016	804	180	33
Jefferson																
Kenner	10,423	1,522	6,338	75	2,363	2,779	7,663	1,221	4,720	54	1,578	1,866	5,637	844	4,273	520
Marrero	28,382	9,129	15,348	1,671	1,802	2,353	22,068	7,823	11,272	1,319	1,326	1,695	18,263	6,166	10,349	1,737
Metairie	1,998	78	1,810	6	99	137	1,560	52	1,436	3	66	78	1,564	32	1,469	63
River Ridge	2,315	799	1,209	45	221	287	1,882	687	985	34	149	184	1,296	475	737	84
Lafayette																
Lafayette	31,353	5,956	24,173	156	866	1,083	23,935	5,261	17,867	120	562	694	20,288	3,772	15,713	814
Orleans																
New Orleans	302,037	66,213	207,245	9,726	16,188	21,933	237,830	59,432	156,321	8,073	11,874	15,684	198,643	48,069	133,923	16,651
District 3																
Calcasieu																
Sulphur	15,794	12,722	1,484	317	958	1,159	11,867	9,780	992	220	663	785	9,160	8,087	665	430
Lafayette																
Lafayette	90,021	64,621	15,181	3,559	5,370	6,448	72,093	53,562	10,867	2,742	3,895	4,651	59,162	48,132	7,234	3,802

Split Places

DR: LA 2020 12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A5 v2

Plan Type: Congress - Public Submissions

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 3																
St. Landry																
Opelousas	2,375	1,100	1,109	87	58	70	1,816	938	758	66	44	50	1,565	999	505	67
Terrebonne																
Bayou Blue	2,189	1,516	396	18	129	156	1,591	1,158	249	13	79	92	1,045	717	267	63
Bayou Cane	6,415	4,262	1,197	152	425	506	4,921	3,468	804	118	279	312	3,069	2,441	400	227
Houma	830	186	571	6	31	50	623	158	408	5	26	34	449	109	320	22
District 4																
Bossier																
Bossier City	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Shreveport	735	462	158	57	45	60	652	433	111	54	42	54	308	227	60	22
Caddo																
Blanchard	3,080	2,403	479	33	69	73	2,306	1,828	331	25	50	41	1,966	1,675	221	68
Greenwood	3,151	1,952	915	39	155	158	2,564	1,664	681	26	119	105	2,396	1,537	742	117
Shreveport	74,064	49,868	17,189	2,797	2,804	3,353	58,264	40,859	12,158	2,081	2,048	2,342	49,032	36,979	9,010	3,077
Calcasieu																
Sulphur	6,015	4,743	704	50	343	460	4,434	3,608	427	39	233	315	2,915	2,576	195	128
Ouachita																
Bawcomville	3,091	2,301	398	14	275	319	2,316	1,822	218	13	173	190	1,417	1,230	121	65
Brownsville	2,796	1,591	881	15	240	260	2,111	1,306	585	13	155	167	1,466	1,063	357	49
Monroe	17,800	11,429	5,042	627	486	514	13,911	9,311	3,620	477	318	329	11,285	8,422	2,346	516
Richwood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
West Monroe	9,044	6,274	2,077	116	439	505	7,177	5,234	1,442	88	303	355	5,148	4,151	786	205
District 5																
Bossier																
Bossier City	62,701	33,030	20,758	2,115	5,390	6,695	46,623	26,568	13,827	1,519	3,617	4,395	31,325	20,140	8,846	2,351
Shreveport	2,173	868	1,045	119	94	140	1,678	737	732	96	73	107	418	228	159	29
Caddo																
Blanchard	458	316	91	2	35	42	304	216	63	0	16	21	244	164	69	11
Greenwood	15	0	12	0	3	2	12	0	10	0	2	2	7	0	5	0
Shreveport	110,621	16,311	90,082	790	2,534	3,105	82,369	14,118	65,226	611	1,709	2,063	67,767	11,303	53,972	2,497
East Baton Rouge																
Baton Rouge	105,729	9,402	90,475	1,210	4,134	4,987	79,789	8,575	67,000	951	2,852	3,436	63,966	5,955	55,522	2,480
Zachary	19,303	9,144	9,040	362	506	557	13,603	6,731	6,093	232	361	365	12,436	6,316	5,642	481

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Split Places

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A5 v2

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Split VTDs

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A5 v2

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Split VTDs

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A5 v2

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Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A5 v2

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Split VTDs

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A5 v2

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	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 5																
East Baton Rouge																
1-5	1,893	365	1,398	42	79	108	1,536	338	1,092	41	60	79	868	198	604	67
1-68	529	21	470	21	14	14	413	18	371	10	11	12	432	11	399	23
2-15	1,060	340	675	14	16	32	772	282	451	12	14	27	638	215	387	36
2-26	1,664	943	677	4	17	19	1,265	703	533	2	14	14	1,166	641	496	29
2-28	3,118	1,030	1,944	42	57	86	2,220	794	1,321	28	40	55	1,968	716	1,165	87
3-12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Feliciana																
4	2,190	1,342	770	8	40	31	1,783	1,091	633	7	31	22	1,741	1,092	605	44
Ouachita																
17	1,417	138	1,258	2	10	27	988	121	849	1	9	18	791	67	705	19
18	3,881	556	2,312	230	771	787	3,361	546	1,821	228	760	781	1,162	13	1,116	33
Richland																
32	41	37	4	0	0	0	27	26	1	0	0	0	26	17	9	0
St. Landry																
1	1,474	902	510	13	40	37	1,131	697	394	7	25	27	837	550	271	16
7A	77	7	65	1	3	5	63	4	56	1	1	3	47	36	10	0
11	1,718	213	1,482	2	12	18	1,245	169	1,064	2	7	12	1,110	115	975	20
14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 6																
Ascension																
28	32	7	21	0	4	2	23	6	13	0	4	1	15	5	7	0
34	10	5	3	0	2	2	10	5	3	0	2	2	9	7	1	0
35	1,908	1,693	48	12	116	145	1,398	1,269	34	2	69	85	1,290	1,223	24	43
43	460	431	2	0	22	36	357	340	0	0	15	26	327	298	16	14
East Baton Rouge																
1-5	1,970	750	826	192	175	238	1,682	705	652	165	139	175	954	217	665	71
1-68	18	0	18	0	0	0	16	0	16	0	0	0	17	0	16	0
2-15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2-26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2-28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3-12	3,399	1,002	1,569	140	645	739	2,512	914	1,030	109	433	505	1,551	700	701	150
East Feliciana																

Split VTDs

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 6																
East Feliciana																
4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany																
304	834	702	57	6	47	54	679	580	45	3	30	36	597	402	172	32

Lucas, Lorri

From: Michael Pernick <mpernick@naacpldf.org>
Sent: Monday, October 18, 2021 11:13 AM
To: Sen. & Gov Affairs Cmte; House & Governmental Affairs
Cc: Arielle McTootle; Jared Evans; Kathryn Sadasivan
Subject: Written Submission - Congressional Redistricting
Attachments: 2021.10.18 - Letter re Louisiana Congressional Redistricting.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good morning,

Attached is a written submission regarding congressional redistricting for distribution to the Committee on House and Governmental Affairs and Committee on Senate Governmental Affairs in advance of the upcoming roadshow, submitted on behalf of the NAACP Legal Defense & Educational Fund, Louisiana State Conference of the NAACP, Power Coalition for Equity and Justice, American Civil Liberties Union of Louisiana, the ACLU Voting Rights Project, Campaign Legal Center, Southern Poverty Law Center Action Fund, Voters Organized to Educate, Voice of the Experienced, Louisiana Progress, Fair Districts Louisiana, E Pluribus Unum, Black Voters Matter Fund, Louisiana Budget Project, League of Women Voters of Louisiana, Urban League of Louisiana, and Crescent City Media Group.

Please feel free to reach out to me with any questions.

Sincerely,
Michael Pernick



Michael Pernick (he/him/his)

Redistricting Counsel

NAACP Legal Defense and Educational Fund, Inc.

40 Rector Street, 5th Floor, New York, NY 10006

■ t 212.965.3708 ■ c 917.790.3597 ■ mpernick@naacpldf.org

www.naacpldf.org  

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Sent Via Email

October 18, 2021

Senate and Governmental Affairs Committee
Louisiana State Senate
P.O. Box 94183
Baton Rouge, LA 70804
s&g@legis.la.gov

House and Governmental Affairs Committee
Louisiana House of Representatives
P.O. Box 94062
Baton Rouge, LA 70804
h&ga@legis.la.gov

Re: Congressional Redistricting Compliance with Section 2 of the Voting Rights Act

Dear Chair Stefanski, Chair Hewitt, and Other Members of the House and Senate Governmental Affairs Committees:

The NAACP Legal Defense and Educational Fund, Inc., Louisiana State Conference of the NAACP, Power Coalition for Equity and Justice, American Civil Liberties Union of Louisiana, the ACLU Voting Rights Project, Campaign Legal Center, Southern Poverty Law

Center Action Fund, Voters Organized to Educate, Voice of the Experienced, Louisiana Progress, Fair Districts Louisiana, E Pluribus Unum, Black Voters Matter Fund, Louisiana Budget Project, League of Women Voters of Louisiana, Urban League of Louisiana, and Crescent City Media Group write to highlight your affirmative obligation to comply with Section 2 of the Voting Rights Act (“Section 2”) during this reapportionment and redistricting cycle when preparing a new district map to elect Louisiana’s six members of the United States House of Representatives. In particular, we urge you to consider whether Section 2 requires this body to enact a map with **two** opportunity districts each comprised of a majority of Black voters (“majority-minority opportunity district”). Under the existing map, there is one majority-minority opportunity district.

It is fair, necessary, and logical that Black Louisianans—who comprise nearly one-third of Louisiana’s residents, according to 2020 Census data—have an opportunity to elect their preferred congressional representatives. Members of Congress make decisions and enact policies that impact every aspect of American life, including access to education, economic opportunity, housing, health care, and criminal justice. An additional majority-minority opportunity district, which Section 2 likely requires, would provide Black voters with representation to address the state’s pervasive and ongoing record of inequality of opportunity in various aspects of life.

I. Background

In the next few months, the state legislature will redraw district maps for Louisiana’s six congressional districts based on data from the 2020 census. Your committees play an important role in that process.¹ It is critical that the state legislature uses this opportunity to remedy the long-standing dilution of Black voting strength in Louisiana’s congressional map. Nearly one-third of Louisiana residents are Black,² but the state has had only four Black Congresspeople since Reconstruction.³ This is a direct consequence of the configuration of Louisiana’s congressional districts: Black voters are packed into District 2, the state’s only majority-minority opportunity district, and Black communities are cracked among the state’s five majority-white districts (Districts 1, 3, 4, 5, 6). Although District 2 has elected Black candidates in all but one congressional race over the past 30 years,⁴ none of the majority-

¹ Congressional maps are drawn by the state legislature and subject to gubernatorial veto. La. Const. Art. III, § 6.

² U.S. Census Bureau QuickFacts, United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/LA/POP010220#POP010220> (last visited Sep. 10, 2021). According to 2020 Census data, the total number of Black Louisiana residents over the age of 18 (also known as the Black voting age population, or BVAP) has increased by 4.4 percent since 2010.

³ See *Black-American Members by State and Territory, 1870–Present*, History, Art & Archives: United States House of Representatives, <https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/> (last accessed Sep. 1, 2021).

⁴ Voters in District 2 have elected a Black candidate in all but one congressional election since 1990. See *Louisiana’s 2nd Congressional District*, Ballotpedia, https://ballotpedia.org/Louisiana%27s_2nd_Congressional_District (last visited Aug. 31, 2021).

white districts have ever elected a Black Congressperson.⁵ Simply put, Black voters in Louisiana are afforded less opportunity to elect candidates of their choice than white voters.

II. The State Legislature Has an Obligation to Comply with Section 2 of the Voting Rights Act in Redistricting.

The state legislature has an affirmative obligation to comply with the Voting Rights Act in the redistricting process. In particular, this Committee has an obligation under Section 2 of the Voting Rights Act to ensure that, under the totality of circumstances, racial minority voters, such as Black Louisianans, have equal opportunity “to participate in the electoral process and to elect representatives of their choice.”⁶ A Section 2 violation may require states, under certain circumstances, to draw majority-minority opportunity districts to provide minority voters with an effective opportunity to elect their preferred candidates.

A chief purpose of Section 2 is to prohibit minority vote dilution at all levels of government.⁷ A district map may violate Section 2 when it dilutes the voting power of voters of color, including by “packing” Black voters into districts where they constitute an unnecessarily large majority and depriving them of the opportunity to elect candidates of choice in other districts.⁸ Section 2 prohibits minority vote dilution regardless of whether a plan was adopted with a discriminatory purpose.⁹ Indeed, Section 2 outlaws redistricting plans that result in a reduced ability of voters of color to elect candidates of their choice.

In *Thornburg v. Gingles*, 478 U.S. 30 (1986), the U.S. Supreme Court set forth three conditions indicating that a districting plan or voting system has resulted in vote dilution. The three “*Gingles* preconditions” are whether: (1) an alternative districting plan can be drawn that includes one or more single-member districts in which the minority community is sufficiently large and geographically compact to constitute a majority in the district; (2) the minority group is politically cohesive in its support for its preferred candidates; and (3) in the absence of majority-minority districts, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters in support of different candidates.¹⁰ Together, the second and third *Gingles* preconditions are commonly referred to as racial bloc or racially polarized voting.¹¹

If these three *Gingles* preconditions are met, a decisionmaker must then evaluate the “totality of circumstances” to determine whether minority voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.”¹² Courts consider several factors (commonly known as the

⁵ See *United States Congressional Delegations from Louisiana*, Ballotpedia, https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana (last visited Aug. 31, 2021).

⁶ *Thornburg v. Gingles*, 478 U.S. 30, 34 (1986).

⁷ See *St. Bernard Citizens For Better Gov't v. St. Bernard Par. Sch. Bd.*, No. CIV.A. 02-2209, 2002 WL 2022589, at *10 (E.D. La. Aug. 26, 2002); *Fifth Ward Precinct 1A Coal. & Progressive Ass'n v. Jefferson Par. Sch. Bd.*, No. CIV.A. 86-2963, 1989 WL 3801, at *1 (E.D. La. Jan. 18, 1989).

⁸ See *Gingles*, 478 U.S. at 46, n.11.

⁹ *Id.* at 35.

¹⁰ *Id.* at 50-51.

¹¹ Racially polarized voting occurs when different racial groups vote for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and most non-Black voters vote for the opposing (typically white) candidate.

¹² 52 U.S.C. § 10301(b); *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006).

“Senate Factors”) pertaining to the jurisdiction’s history of voter discrimination to determine whether the minority vote has been diluted impermissibly.¹³ It will be “only the very unusual case in which the plaintiffs can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of circumstances.”¹⁴

III. A New Congressional District Map With Only One Majority-Minority Opportunity District Likely Violates Section 2 of the Voting Rights Act.

Based on the results of the 2020 Census, a new congressional district map for Louisiana that includes only one majority-minority opportunity district likely violates Section 2 of the Voting Rights Act. Each of the three *Gingles* preconditions are likely present in Louisiana, and there is ample evidence that under the totality of circumstances, Black voters have less opportunity than other members of the electorate to participate in the political process and elect candidates of their choice.

a. *Gingles* Precondition One: It Is Possible to Draw a Congressional District Map with Two Majority-Minority Opportunity Districts.

It is entirely possible to draw a second majority-minority opportunity district in the six-district congressional map. Appendix 1 provides seven different demonstrative district map plans, based on 2020 Census data, in which two districts are comprised of a majority of Black voters.

In each plan, the Black community, measured by the Black voting age population (BVAP) within each of the two majority-minority opportunity districts, is sufficiently large and geographically compact to satisfy the first *Gingles* precondition. First, each of the seven maps includes a second majority-minority opportunity district (in addition to District 2) where the BVAP is over 50%.¹⁵ Second, as compared to the current map, the illustrative maps include geographically compact communities of Black voters, as reflected by traditional redistricting principles.¹⁶ Indeed, each of the seven illustrative maps is equally or more

¹³ Courts examine the “totality of the circumstances” based on the so-called “Senate Factors,” named for the Senate Report accompanying the 1982 Voting Rights Act amendments in which they were first laid out. *Gingles*, 478 U.S. at 43-45. The Senate Factors are: (1) the extent of any history of discrimination related to voting; (2) the extent to which voting is racially polarized; (3) the extent to which the state or political subdivision uses voting practices that may enhance the opportunity for discrimination; (4) whether minority candidates have access to candidate slating processes; (5) the extent to which minority voters bear the effects of discrimination in areas of life like education, housing, and economic opportunity; (6) whether political campaigns have been characterized by overt or subtle racial appeals; (7) the extent to which minority people have been elected to public office; (8) whether elected officials are responsive to the needs of minority residents; and (9) whether the policy underlying the voting plan is tenuous. *Id.* at 36-37. However, “there is no requirement that any particular number of factors be proved, or that a majority of them point one way or the other.” *Id.* at 45.

¹⁴ *Clark v. Calhoun Cty.*, 21 F.3d 92, 97 (5th Cir. 1994).

¹⁵ See *infra* Appendix 2. The Supreme Court has held that a minority community is sufficiently large when it “make[s] up more than 50 percent of the voting-age population in the relevant geographical area.” *Bartlett v. Strickland*, 556 U.S. 1, 18 (2009).

¹⁶ *League of United Latin Am. Citizens*, 548 U.S. at 433 (“While no precise rule has emerged governing § 2 compactness, the inquiry should take into account traditional districting principles such as maintaining communities of interest and traditional boundaries.”).

compact than the current map on at least two of the three widely recognized statistical measures of compactness.¹⁷

As set forth in Appendix 1, there are numerous and varied district configurations with two majority-minority opportunity districts where the BVAP is the numerical majority, and the Black voting community is geographically compact. Accordingly, the first *Gingles* precondition would likely be satisfied if Louisiana's new congressional map fails to provide a second majority-minority opportunity district.¹⁸

b. *Gingles* Preconditions Two and Three: Louisiana Elections Reflect Racially Polarized Voting Patterns.

There is ample evidence to suggest that the second and third *Gingles* preconditions are satisfied due to Louisiana's well-documented history and ongoing record of racially polarized voting in elections across the state.

Over the past three decades, numerous federal courts have found that racially polarized voting pervades Louisiana statewide and local elections.¹⁹ In the past two decades—including as recently as this year—the Department of Justice (DOJ) has sued local parishes under Section 2 three times; in each case, the DOJ identified racially polarized voting patterns within the parish.²⁰

The 2020 congressional elections similarly reflected racially polarized voting patterns. For instance, in the five districts comprised of a majority of white voters, there were four

¹⁷ See *Compactness Reports for Illustrative Maps* (on file with LDF).

¹⁸ See *Gingles*, 478 U.S. at 50.

¹⁹ A district court recently found that there was sufficient preliminary evidence of racially polarized voting statewide to support plaintiffs' challenge to Louisiana's Supreme Court district map. *Louisiana State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020). In *St. Bernard Citizens For Better Government*, the district court found racially polarized voting patterns in statewide gubernatorial elections, as well as local parish elections. *St. Bernard Citizens For Better Gov't*, 2002 WL 2022589, at *7 (E.D. La. Aug. 26, 2002). See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 436-37 (M.D. La. 2017), *rev'd sub nom. Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (The district court found that there were racially polarized voting patterns in the parish's judicial elections, and although the Fifth Circuit reversed the district court's decision, it held that the district court did not err in its finding of racially polarized voting); *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1124 (E.D. La. 1986); *Major v. Treen*, 574 F. Supp. 325, 337 (E.D. La. 1983) (The court held that there was racial polarization in Orleans Parish).

²⁰ Most recently, in 2021, the DOJ sued the City of West Monroe under Section 2 over its at-large alderman elections. The DOJ contended that there was racially polarized voting sufficient to satisfy *Gingles* because "[i]n contests between Black candidates and White candidates for West Monroe Board of Alderman and other parish, state, and federal positions, White voters cast their ballots sufficiently as a bloc to defeat the minority's preferred candidate." The court agreed and entered a consent decree between the parties. *United States v. City of West Monroe*, No. 21-cv-0988 (W.D. La. Apr. 14, 2021); see also *United States v. City of Morgan*, No. 00-cv-1541 (W.D. La. Aug. 17, 2000) ("Racially polarized voting patterns prevail in elections for the City Council of Morgan City. In contests between [B]lack and white candidates for City Council, [B]lack voters consistently vote for [B]lack candidates and white voters vote sufficiently as a bloc to usually defeat the [B]lack voters' candidates of choice."); *Greig v. City of St. Martinville*, No. 00-cv-00603 (W.D. La. Jun. 3, 2000) (The DOJ asserted that "[e]lections in the City of St. Martinville are racially polarized").

contests in which voters had a choice between Black and white congressional candidates. In each of these four races, white candidates were elected over Black candidates.²¹ Therefore, there is ample evidence to support the conclusion that there are racially polarized voting patterns that may satisfy *Gingles* preconditions two and three.

c. Totality of Circumstances: Louisiana's Voters of Color Have Less Opportunity to Elect Candidates of Their Choice.

In addition to the indicia of the three *Gingles* preconditions, under the “totality of circumstances,” Black voters have “less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice” in Louisiana’s congressional elections.²² Several of the Senate Factors, listed in footnote 13 above, strongly indicate that vote dilution is occurring, including: the extent of the history of voting discrimination in Louisiana (Factor 1); the extent of racially polarized voting in Louisiana (Factor 2); the extent to which Louisiana has used voting practices that may enhance the opportunity for discrimination against Black voters (Factor 3); the extent to which Black voters bear the effects of discrimination in a variety of areas of life (Factor 5); whether political campaigns in Louisiana have been characterized by overt or subtle racial appeals (Factor 6); and the extent to which Black candidates have been elected to public office in Louisiana (Factor 7). The following are a sample of the indicia under the totality of circumstances impacting Black voters’ ability to participate equally in Louisiana’s congressional elections:

- The state of Louisiana has an extensive history and ongoing record of voting discrimination that has adversely impacted the right of Black and other minority voters to register to vote, to vote, or otherwise to participate in the political process.²³ Since Reconstruction, Louisiana has passed countless laws to deny Black democratic participation, including grandfather clauses, poll taxes, and educational and property qualifications.²⁴
- Louisiana has a long history and ongoing record of employing voting practices, such as at-large elections and redistricting, that have diluted the weight of Black Louisianans’ vote once they cast them. As mentioned above, the DOJ has sued parishes in Louisiana for violating Section 2’s non-vote dilution prohibition three

²¹ See *United States House of Representatives elections in Louisiana, 2020*, Ballotpedia, https://ballotpedia.org/United_States_House_of_Representatives_elections_in_Louisiana,_2020 (last accessed Sep. 1, 2021).

²² *Gingles*, 478 U.S. at 36-37 (quoting 42 U.S.C. § 10301(b)).

²³ *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at *9 (quoting *Citizens for a Better Gretna*, 636 F. Supp. at 1124) (“The history of black citizens’ attempts, in Louisiana since Reconstruction, to participate effectively in the political process and the white majority’s resistance to those efforts is one characterized by both *de jure* and *de facto* discrimination. Indeed, it would take a multi-volumed treatise to properly describe the persistent, and often violent, intimidation visited by white citizens upon black efforts to participate in Louisiana’s political process.”)

²⁴ Debo P. Adegbile, *Voting Rights in Louisiana: 1982 -2006*, 17 S. Cal. Rev. L. & Soc. Just. 416-418 (2008).

times over the past thirty years.²⁵ Most recently, the DOJ successfully challenged the City of West Monroe's at-large alderman elections under Section 2.²⁶ From the passage of the Voting Rights Act in 1965 until the Supreme Court's *Shelby County v. Holder* decision in 2013, the DOJ blocked nearly 150 proposed changes to voting policies or practices in Louisiana on the grounds that they discriminated against Black voters or diluted Black voting strength, pursuant to Section 5 of the Voting Rights Act.²⁷

- Louisiana's statewide district maps have been challenged under the Voting Rights Act in numerous reapportionment cycles since 1965.²⁸ Indeed, District 2, Louisiana's only majority-minority district, was established in 1983 only after a federal district court held that the 1981 proposed congressional map diluted Black voting power in Orleans Parish by dispersing the parish's Black majority into two different congressional districts.²⁹
- Louisiana political campaigns have been characterized by subtle and overt racial appeals impacting the political process. Current U.S. Representative for Louisiana's first congressional district, Steve Scalise, spoke to a white supremacist group in 2002 while serving as a Louisiana state legislator.³⁰ David Duke, the former grand wizard of the Ku Klux Klan, has run for public office in Louisiana several times; most recently, in 2016, he unsuccessfully ran for U.S. Senate to "defend the heritage of European American people."³¹ Even with his explicit ties to white supremacy, Duke received over 58,000 votes.³² In 2018, a white

²⁵ See *Cases Rising Claims Under Section 2 of the Voting Rights Act*, Department of Justice, <https://www.justice.gov/crt/cases-raising-claims-under-section-2-voting-rights-act-0> (last accessed Aug. 25, 2021).

²⁶ See *United States v. City of West Monroe*, No. 21-cv-0988 (W.D. La. Apr. 14, 2021).

²⁷ See *Voting Determination Letters for Louisiana*, Department of Justice, <https://www.justice.gov/crt/voting-determination-letters-louisiana> (last accessed Aug. 25, 2021).

²⁸ See *Louisiana House of Representatives v. Ashcroft*, No. 02-0062 (D.D.C. May 21, 2003) (challenge to congressional redistricting after the 2000 census); *Hays v. Louisiana*, 936 F. Supp. 2d 820, 824-826 (M.D. La. 1996) (challenge to congressional redistricting after 1990 Census); *Major v. Treen*, 574 F. Supp. 325 (E.D. La. 1983) (challenge to congressional redistricting after 1980 Census); *Bussie v. Governor of La.*, 333 F. Supp. 452, 454, 463 (E.D. La. 1971) (challenge to state legislative redistricting after 1970 Census).

²⁹ See *Major*, 574 F. Supp. at 327. Although this case predated *Gingles*, the district court found that racially polarized voting, combined with "Louisiana's history of racial discrimination, both *de jure* and *de facto*, continue to have an adverse effect on the ability of its [B]lack residents to participate fully in the electoral process." *Id.* at 339-40.

³⁰ Dan Roberts, *Senior Republican Steve Scalise spoke at white supremacist meeting in 2002*, The Guardian, (Dec. 30, 2014), <https://www.theguardian.com/us-news/2014/dec/29/senior-republican-steve-scalise-spoke-at-white-supremacist-meeting-in-2002>.

³¹ Camila Domonoske, *Former KKK Leader David Duke Says 'Of Course' Trump Voters Are His Voters*, NPR, (Aug. 5, 2016), <https://www.npr.org/sections/thetwo-way/2016/08/05/488802494/former-kkk-leader-david-duke-says-of-course-trump-voters-are-his-voters>.

³² *United States Senate election in Louisiana, 2016*, Ballotpedia, https://ballotpedia.org/United_States_Senate_election_in_Louisiana,_2016 (last accessed Sep. 1, 2021).

Tangipahoa School Board Member and candidate for reelection posted a picture of a noose on Facebook with the caption “IF WE WANT TO MAKE AMERICA GREAT AGAIN WE WILL HAVE TO MAKE EVIL PEOPLE FEAR PUNISHMENT.”³³

- In 2001, the St. Bernard Parish School Board was sued under Section 2 for its redistricting plan that eliminated the only district where Black voters had an opportunity to elect a candidate of choice. Lynn Dean, a white state senator who was involved in the redistricting and the highest-ranking public official in the Parish, testified that he use[d] the [“n-word”] and “ha[d] done so recently.”³⁴
- Black Louisianans continue to experience the brunt of racial discrimination in every sector of public life.³⁵ Black Louisianans experience higher unemployment rates than white Louisianans. Unemployment data from early 2021 shows that Black people were unemployed at a rate of 12%, compared to 5.3% for white people.³⁶ Black Louisianans also experience socioeconomic disparities as a result of systemic discrimination. In 2019, 29.4% of Black people lived below the poverty line, compared to 12.5% of white people.³⁷ Health disparities also persist among Black as compared to white Louisianans. Although only one-third of Louisiana’s population, Black people accounted for more than 70% of the people who died of COVID-19.³⁸
- Black people have been largely underrepresented in Louisiana public offices.³⁹ Louisiana has never had a Black U.S. Senator and has not had a Black governor since Reconstruction. As described above, Louisianans rarely elect Black

³³ Caroline Grueskin, *Tangipahoa School Board member who posted noose meme opts for last-minute run for reelection*, The Advocate (Jul. 31, 2018), https://www.theadvocate.com/baton_rouge/news/communities/livingston_tangipahoa/article_e0999182-9506-11e8-bf14-fb6afcf2a6ee.html.

³⁴ *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at *10.

³⁵ “Congress and the Courts have recognized the effect lower socio-economic status has on minority participation in the political process.” *Id.* In *Citizens for a Better Gretna*, the court found that “depressed levels of income, education and employment are a consequence of severe historical disadvantage” that in turn engenders “depressed levels of participation in voting and candidacy.” 636 F. Supp. at 1120.

³⁶ *State unemployment by race and ethnicity*, Economic Policy Institute, <https://www.epi.org/indicators/state-unemployment-race-ethnicity/> (last updated July 2021).

³⁷ *Poverty Rate by Race/Ethnicity*, KFF, <https://www.kff.org/other/state-indicator/poverty-rate-by-raceethnicity/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D> (last accessed Sep. 1, 2021).

³⁸ *Black Communities Are Hit Hardest By COVID-19 In Louisiana And Elsewhere*, New Orleans Public Radio, (Apr. 6, 2020), <https://www.wvno.org/latest-news/2020-04-06/black-communities-are-hit-hardest-by-covid-19-in-louisiana-and-elsewhere>.

³⁹ The U.S. Supreme Court has held that one of the “predominant” factors under Section 2 is “the extent to which members of the minority group have been elected to public office in the jurisdiction.” *Gingles*, 478 U.S. at 37. See also *Citizens for a Better Gretna*, 636 F. Supp. at 1120 (“Where members of the minority group have not been elected to public office, it is of course evidence of vote dilution.”)

candidates to Congress; the state has had only four Black Congresspeople since Reconstruction, all of whom were elected to represent majority Black districts.⁴⁰ By contrast, since the Voting Rights Act was adopted in 1965, Louisiana has sent 45 white representatives to Congress.⁴¹ As noted above, none of the majority white districts in Louisiana has ever elected a Black representative. Louisiana's first Black chief Justice of the state Supreme Court was appointed in 1994 following a consent decree that was entered in a case challenging the use of at-large judicial districts. As part of the consent decree, the court created a majority-minority judicial district that has continued to elect the only Black member of the State Supreme Court.⁴²

IV. The Louisiana State Legislature Can And Must Enact a Map with Two Majority-Minority Opportunity Districts.

For the reasons explained above, the state Legislature must earnestly consider its obligations under the Voting Rights Act and adopt a congressional map with two majority-minority opportunity districts to ensure Black voters' right to an equal opportunity to elect candidates of their choice. The seven maps submitted with this letter—each of which includes two majority-minority districts—show that doing so is entirely feasible. We urge the state to fully consider and adopt a congressional map that ensures non-dilution of Black voting strength in Louisiana.⁴³ Failure to do so may lead to costly litigation.⁴⁴ We are happy to discuss the contents of this letter further and to provide additional assistance with developing a more inclusive congressional districting plan.

Please feel free to contact LDF Redistricting Counsel Michael Pernick at (917) 790-3597 or by email at mpernick@naacpldf.org with any questions or to discuss these issues in more detail.

⁴⁰ Three of the Black Congresspeople were elected in large part due to Black voter support in District 2. See *Black-American Members by State and Territory, 1870–Present*, History, Art & Archives: United States House of Representatives, <https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/> (last accessed Sep. 1, 2021).

⁴¹ See *United States Congressional Delegations from Louisiana*, Ballotpedia, https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana (last visited Aug. 31, 2021).

⁴² See *Chisom v. Jindal*, 890 F. Supp. 2d 696, 702-705 (E.D. La. 2012).

⁴³ The Census Bureau will provide states, upon request, with data files to allow states to reallocate incarcerated populations to their pre-incarceration addresses for redistricting and other purposes. See Final 2020 Census Residence Criteria and Residence Situations, 83 Fed. Reg. 5525 (Feb. 8, 2018), available at <https://www.federalregister.gov/documents/2018/02/08/2018-02370/final-2020-census-residence-criteria-and-residence-situations#p-47>. We urge your committee to request this data from the Census Bureau and draw maps that reallocate incarcerated populations to their pre-incarceration residences.

⁴⁴ NAACP Legal Defense and Educational Fund, Inc., *The Cost (in Time, Money, and Burden) of Section 2 of the Voting Rights Act Litigation as of February 21*, NAACP Legal Defense and Educational Fund, <https://www.naacpldf.org/wp-content/uploads/Section-2-costs-2.19.21.pdf> (last visited Aug. 2, 2021).

Sincerely,

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NAACP Legal Defense and Educational Fund, Inc. ("LDF")

Since its founding in 1940, LDF has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in the areas of education, economic justice, political participation, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that prohibit voter discrimination, intimidation, and suppression and increase access to the electoral process.

Louisiana NAACP State Conference

Louisiana State Conference of the National Association for the Advancement of Colored People (the "Louisiana NAACP State Conference") is a state subsidiary of the National Association for the Advancement of Colored People, Inc. For decades, the Louisiana NAACP State Conference has worked towards its mission to ensure the political, educational, social, and economic equality of all persons and to eliminate race-based discrimination.

Power Coalition for Equity and Justice

The Power Coalition for Equity and Justice works to build voice and power in traditionally ignored communities. We are a coalition of groups from across Louisiana whose mission is to organize in impacted communities, educate and turn out voters, and fight for policies that create a more equitable and just system in Louisiana.

American Civil Liberties Union of Louisiana

The ACLU of Louisiana has worked to advance and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States and the State of Louisiana since 1956. The organization is part of a nationwide network of ACLU affiliates that fight tirelessly in all 50 states, Puerto Rico, and Washington, D.C.

American Civil Liberties Union Foundation

For 100 years, the ACLU has been our nation's guardian of liberty, working in courts, legislatures, and communities to defend and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States. Whether it's ending mass incarceration, achieving full equality for the LGBT community, advancing racial justice, establishing new privacy protections for our digital age, or preserving the right to vote or the right to have an abortion, the ACLU takes up the toughest civil liberties and civil rights cases and issues to defend all people from government abuse and overreach. With more than one million members, activists, and supporters, the ACLU is a nationwide organization that fights tirelessly in all 50 states, Puerto Rico, and Washington, D.C., for the principle that every individual's rights must be protected equally under the law, regardless of race, religion, gender, sexual orientation, gender identity or expression, age, disability, national origin, and record of arrest or conviction.

Campaign Legal Center

The nonpartisan Campaign Legal Center advances democracy through the law at the federal, state and local levels, fighting for every American's rights to responsive government and a fair opportunity to participate in and affect the democratic process. Since the organization's founding in 2002, CLC has participated in major redistricting, voting rights, and campaign finance cases before the U.S. Supreme Court as well as numerous other federal and state court cases. CLC's work promotes every citizen's right to participate in the democratic process.

Southern Poverty Law Center Action Fund

SPLC Action is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people.

Voters Organized to Educate

Voters Organized is a 501(c)4 non-profit focused on building collective power to create change in the criminal legal system. We are dedicated to building an educated and engaged democracy. We do this by keeping people informed regarding elections, and ongoing issues in city, state, and national policy reform. Through working with organizations and individuals that believe in the principles of social justice and equality, Voters Organized impacts elections and legislation in Louisiana and beyond. We educate and mobilize organizations and individuals that believe in the principles of grassroots movement building, social justice, and equality.

Voice of the Experienced (VOTE)

VOTE is a grassroots organization founded and run by formerly incarcerated people (FIP), our families and our allies. We are dedicated to restoring the full human and civil rights of those most impacted by the criminal (in)justice system. Together we have the experiences, expertise and power to improve public safety in New Orleans and beyond without relying on mass incarceration.

Louisiana Progress

Louisiana Progress works with citizens, community leaders, activists, advocates, students, and policymakers to inform Louisianans on important issues, engage people in the political process, and help them mobilize to fight for people-centered, solutions-driven public policies.

Fair Districts Louisiana

Fair Districts Louisiana is a Louisiana-based grassroots redistricting and voting reform organization.

E Pluribus Unum

Founded by former New Orleans Mayor Mitch Landrieu, E Pluribus Unum (EPU) is a nonprofit, nonpartisan organization whose mission is to build a more just, equitable, and inclusive South, uprooting the barriers that have long divided the region by race and class.

EPU is focused on changing the divisive narratives that perpetuate systemic and interpersonal racism, cultivating and empowering courageous leaders who are advancing racial equity, and championing transformative policy change.

Black Voters Matter Fund

The Black Voter's Matter Fund believes in the value of the voter 365. In this vein not only do we support our partners voting rights during and in between elections, we also support capacity and power building all year long.

Louisiana Budget Project

The Louisiana Budget Project (LBP) monitors and reports on public policy and how it affects Louisiana's low- to moderate-income families. We believe that the lives of Louisianans can be improved through profound change in public policy, brought about by: creating a deeper understanding of the state budget and budget-related issues, looking at the big picture of how the budget impacts citizens, encouraging citizens to be vocal about budget issues that are important to them, and providing insight and leadership to drive the policy debate.

League of Women Voters of Louisiana

The League of Women Voters of Louisiana is a nonpartisan political organization encouraging informed and active participation in government. It influences public policy through education and advocacy.

Urban League of Louisiana

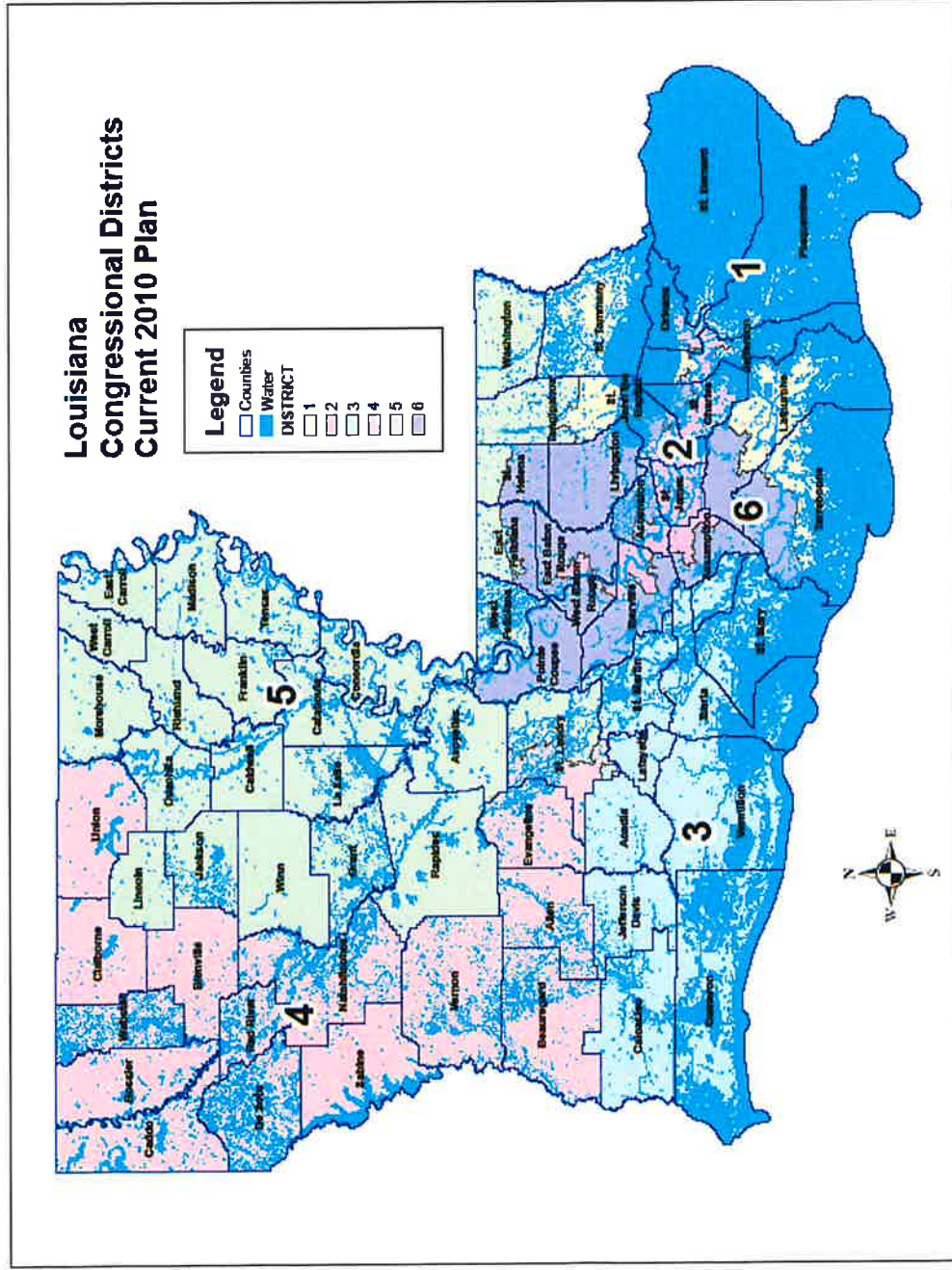
The Urban League of Louisiana's mission is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, and civil rights. As an affiliate of the National Urban League, and for over 83 years, the Urban League of Louisiana has worked to ensure quality education, equal employment, entrepreneurial opportunities, economic inclusion, and shared dignity under the law.

Crescent City Media Group

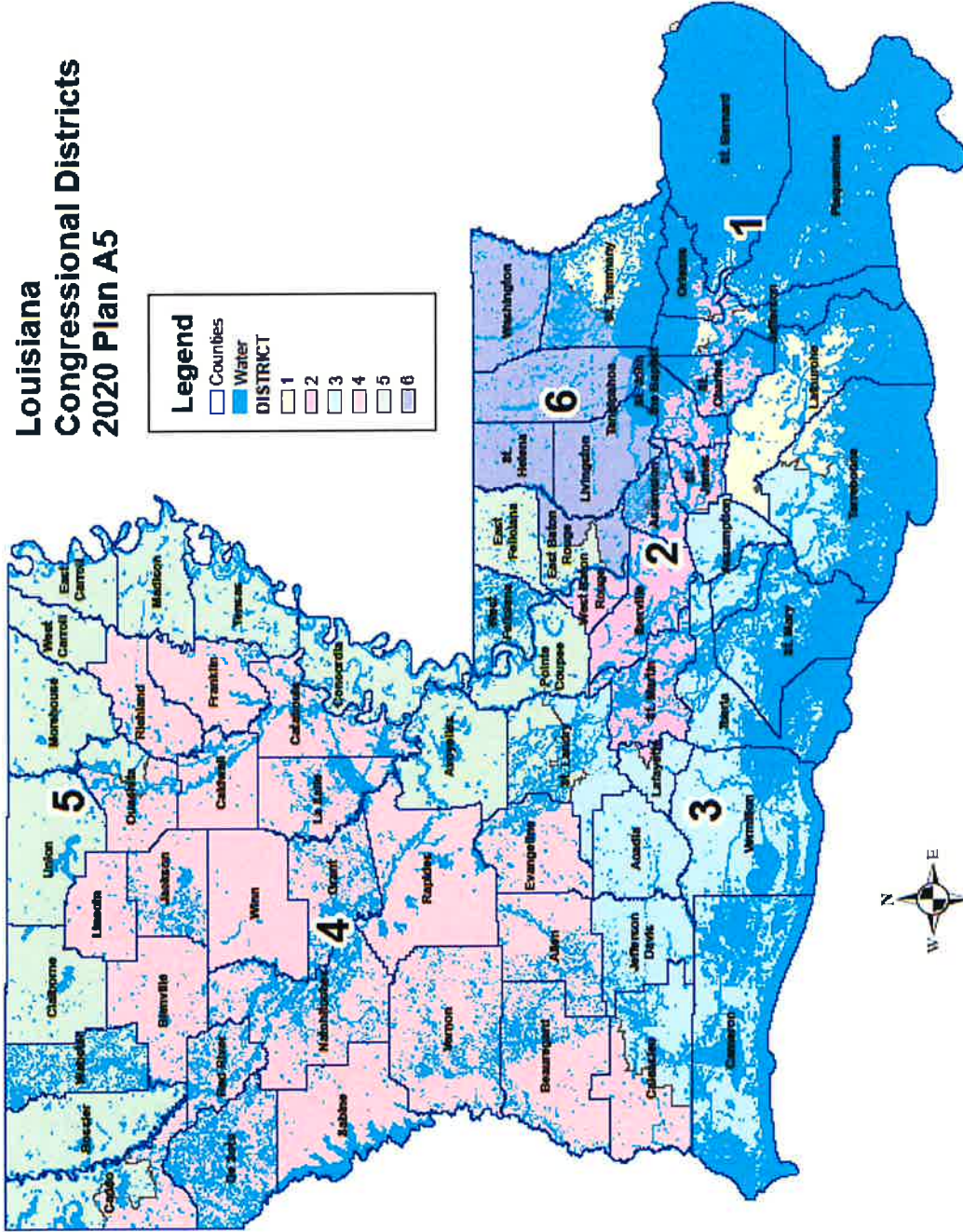
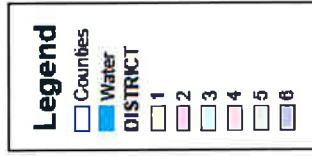
Crescent City Media Group is a civil rights, community engagement and media advocacy organization serving at the nexus of public interest and policy advocacy in communities of color across the state of Louisiana and the US South.

APPENDIX 1

Seven Illustrative Maps (A1 – A7) with Two Majority-Minority Opportunity Districts



Louisiana Congressional Districts 2020 Plan A5



APPENDIX 2

Demographic Data for Illustrative Maps

Current 2010 Plan w/2010 Data

District	TTLPop10	Deviation ⁴⁵	TTLWht10%	TTLBlk10%	VAP10	WhtVAP10%	BlkVAP20%
1	755,445	-117	74.48%	13.56%	579,661	76.63%	12.00%
2	755,538	-24	28.67%	62.24%	569,601	31.77%	59.05%
3	755,596	34	68.95%	25.46%	561,690	71.52%	23.20%
4	755,605	43	59.61%	34.58%	566,830	62.24%	32.45%
5	755,581	19	60.69%	35.67%	567,667	63.05%	33.50%
6	755,607	45	69.57%	23.42%	569,908	71.96%	21.37%

⁴⁵ Under the Equal Protection Clause, congressional districts must have equal population “as nearly as practicable.” *Wesberry v. Sanders*, 376 U.S. 1, 8 (1964). See also *Karcher v. Daggett*, 462 U.S. 725, 730–31 (1983) (holding that congressional districts must be mathematically equal in population, unless a deviation from that standard is necessary to achieve a legitimate state objective).

Plan A4

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,293	0	64.61%	20.82%	588,372	67.52%	19.21%
2	776,293	0	35.14%	53.45%	599,955	37.96%	51.33%
3	776,294	1	70.34%	19.37%	587,539	72.46%	17.96%
4	776,292	-1	57.73%	33.38%	596,619	60.02%	31.62%
5	776,292	-1	39.38%	53.77%	589,961	42.29%	51.12%
6	776,293	0	67.29%	14.84%	608,102	69.68%	13.81%

Plan A5

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,292	-1	64.34%	16.40%	604,384	67.32%	15.00%
2	776,292	-1	33.01%	54.12%	598,314	35.72%	52.19%
3	776,293	0	65.59%	24.64%	586,934	68.28%	22.80%
4	776,293	0	65.73%	25.12%	596,814	67.48%	23.70%
5	776,294	1	38.88%	54.22%	588,975	41.58%	51.93%
6	776,293	0	66.95%	21.10%	595,127	69.42%	19.60%

Field Descriptions:

TTLPop10 - 2010 Total Population (TTL Pop)

TTLPop20 - 2020 Total Population (TTL Pop)

TTLWht20% - 2020 Not-Hispanic White Alone Total Pop%

TTLBlk20% - 2020 Not-Hispanic Any Part Black Total Pop%

VAP20 - 2020 Voting Age Population (VAP)

WhtVAP20% - 2020 Not-Hispanic White Alone VAP%

BlkVAP20% - 2020 Not-Hispanic Any Part Black VAP%

