

Plan Evaluation Form

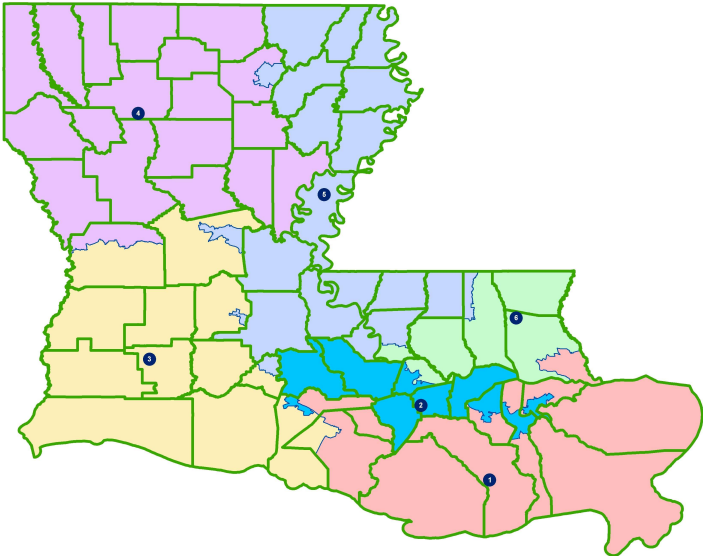
Plan Type: Congress - Public Submissions

Plan Name: NAACPLDF Coalition CD Plan A6 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.	19 (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?	20 (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



Date: January 19, 2022
Time: 12:28 PM

Compactness Report

DR: I A 2020 12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A6 v2

Plan Type: Congress - Public Submissions

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District	Part	Area (sq miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	10946.79	878.42	0.1783	0.4042	2.37	0
District 2	1	2877.75	611.28	0.0968	0.2182	3.21	0
District 3	1	11779.9	901.67	0.1821	0.523	2.34	0
District 4	1	14035.22	847.94	0.2453	0.57	2.02	0
District 5	1	9565.08	1298.47	0.0713	0.3079	3.75	0
District 6	1	3198.01	461.54	0.1887	0.4025	2.3	0

Plan Statistics

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	776,293	776,292	1	0.000%
District 2	1	776,294	776,292	2	0.000%
District 3	1	776,292	776,292	0	0.000%
District 4	1	776,292	776,292	0	0.000%
District 5	1	776,294	776,292	2	0.000%
District 6	1	776,292	776,292	0	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

	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																
Iberia	19,810	14,843	3,594	308	805	977	15,065	11,575	2,517	186	588	675	13,985	11,246	2,311	428
Jefferson	238,074	153,014	31,164	11,614	38,020	47,477	190,739	128,160	22,912	8,769	27,680	33,978	146,178	114,226	13,051	18,901
Lafourche	97,557	71,710	15,855	1,025	4,743	5,672	74,619	56,838	11,077	738	3,189	3,743	58,278	48,467	7,164	2,647
Orleans	77,895	60,031	8,362	3,057	5,508	8,604	65,172	50,728	7,056	2,391	4,241	7,103	54,565	43,805	4,976	5,784
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. Charles	15,625	12,674	1,529	229	823	1,016	11,591	9,644	977	142	564	639	10,667	9,339	884	444
St. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Martin	1,368	1,285	13	7	29	44	1,154	1,091	11	5	17	31	993	979	1	13
St. Mary	40,282	23,841	10,537	725	3,669	4,155	30,553	19,029	7,490	525	2,440	2,710	23,965	16,557	6,016	1,389
St. Tammany	108,823	68,923	27,595	2,784	6,973	8,430	83,663	55,526	19,181	2,047	4,983	5,774	70,653	49,772	15,557	5,322
Terrebonne	109,580	69,934	23,147	1,743	6,119	7,358	82,505	55,631	15,796	1,239	4,089	4,701	61,720	45,395	11,566	4,759
District 1	776,293	515,039	139,533	24,190	73,105	91,979	604,170	418,070	98,818	17,949	52,156	64,759	480,565	367,532	70,157	42,871
	100.000%	66.346%	17.974%	3.116%	9.417%	11.848%	100.000%	69.197%	16.356%	2.971%	8.633%	10.719%	79.541%	76.479%	14.599%	8.921%
District 2																
Ascension	37,224	14,462	19,212	434	2,621	3,253	27,229	11,374	13,459	321	1,732	2,131	23,256	10,304	11,779	1,173
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
Iberia	28,989	11,367	15,046	1,115	1,194	1,457	21,721	9,335	10,498	846	860	1,003	16,711	7,377	8,495	835
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	202,707	67,921	95,053	11,410	24,899	31,580	153,915	55,975	69,263	8,923	17,137	21,506	116,923	45,390	56,525	15,008
Orleans	306,102	66,431	210,607	9,799	16,536	22,413	241,024	59,524	159,012	8,129	12,167	16,053	201,679	48,181	136,549	16,949
St. Charles	36,924	20,876	12,399	608	2,486	3,125	27,950	16,510	8,913	387	1,737	2,098	24,318	14,970	7,913	1,435
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
Terrebonne	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 2	776,294	265,436	423,133	24,717	53,954	69,429	598,799	221,017	313,100	19,568	38,162	48,169	495,794	186,482	270,783	38,525
	100.000%	34.193%	54.507%	3.184%	6.950%	8.944%	100.000%	36.910%	52.288%	3.268%	6.373%	8.044%	82.798%	37.613%	54.616%	7.770%
District 3																
Acadia	57,576	44,480	10,864	238	1,421	1,641	42,943	34,071	7,383	173	916	1,026	37,678	30,555	6,407	716
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
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
Calcasieu	216,785	139,772	59,386	4,702	9,389	11,384	163,166	108,789	41,898	3,359	6,516	7,570	120,511	85,659	29,513	5,339
Cameron	5,617	5,232	125	30	155	197	4,358	4,100	79	23	109	130	4,789	4,610	88	91
Evangeline	23,988	18,552	3,854	176	1,164	1,222	18,192	14,131	2,726	132	1,013	1,037	15,120	12,680	2,170	270

District Population

Plan: NAACPLDF Coalition CD Plan A6 v2

	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																
Iberia	21,130	12,996	5,916	700	1,251	1,463	16,005	10,385	4,054	530	836	979	13,830	9,664	3,546	624
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	170,390	125,633	25,993	5,874	10,325	12,162	130,427	99,150	17,864	4,263	7,198	8,443	108,694	89,725	12,482	6,487
Natchitoches	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0
Rapides	81,311	61,240	12,643	1,807	3,209	3,704	62,331	48,168	8,866	1,321	2,153	2,394	51,587	42,445	6,715	2,428
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	9,124	3,108	5,454	110	292	369	6,968	2,565	4,030	68	201	244	6,245	2,155	3,875	218
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
Vernon	41,462	28,569	7,395	1,344	2,803	3,969	30,611	21,636	5,013	1,003	1,980	2,614	19,150	14,490	2,987	1,674
District 3	776,292	554,981	155,416	17,259	34,361	42,305	587,052	431,534	108,476	12,471	24,040	29,005	468,881	367,087	80,565	21,238
	100.000%	71.491%	20.020%	2.223%	4.426%	5.450%	100.000%	73.509%	18.478%	2.124%	4.095%	4.941%	79.870%	78.290%	17.182%	4.530%
District 4																
Bienville	12,981	6,950	5,600	57	167	211	10,073	5,486	4,284	30	111	141	8,847	4,843	3,917	87
Bossier	128,746	81,052	32,551	3,492	8,378	10,237	95,876	62,931	22,440	2,448	5,580	6,619	69,743	50,861	14,838	4,044
Caddo	237,848	103,457	119,304	4,034	7,213	8,381	182,407	85,059	86,359	3,008	5,023	5,618	151,296	73,113	71,249	6,934
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	14,170	7,263	6,360	88	274	479	11,507	6,258	4,824	55	230	403	8,598	4,632	3,820	146
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
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	37,514	19,361	15,725	255	1,312	1,490	29,348	16,010	11,415	198	1,042	1,140	23,107	12,850	9,224	1,033
Ouachita	90,391	72,679	10,981	1,396	3,243	3,377	68,357	56,173	7,345	975	2,236	2,182	57,839	50,524	5,320	1,995
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
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
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
Vernon	7,288	6,518	216	98	207	206	5,650	5,129	120	71	149	126	4,910	4,692	24	193
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
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	776,292	456,064	261,621	11,716	29,060	34,679	596,684	363,629	190,037	8,627	20,819	24,207	478,671	310,224	149,154	19,292
	100.000%	58.749%	33.701%	1.509%	3.743%	4.467%	100.000%	60.942%	31.849%	1.446%	3.489%	4.057%	80.222%	64.809%	31.160%	4.030%
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

District Population

	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																
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	232,173	61,027	153,505	4,507	11,168	12,813	173,429	49,386	111,565	3,360	7,573	8,594	143,863	44,029	93,729	6,105
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
Evangeline	8,362	2,802	5,381	65	76	114	6,216	2,329	3,757	55	48	74	5,433	1,886	3,473	74
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
Lafayette	71,363	27,730	39,143	580	3,265	3,821	53,448	22,458	28,053	401	2,101	2,386	44,799	18,920	23,999	1,880
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	69,977	15,866	50,236	1,392	1,914	2,281	51,843	13,801	34,945	1,143	1,523	1,764	41,913	9,991	30,338	1,584
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
Rapides	48,712	16,270	29,949	621	1,182	1,386	36,461	13,205	21,339	465	941	1,048	28,589	10,387	17,060	1,141
Richland	20,043	11,785	7,603	83	314	400	15,383	9,338	5,546	66	230	293	13,662	8,470	4,961	231
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. Landry	82,540	43,611	35,836	499	1,958	2,178	61,811	34,209	25,497	353	1,301	1,374	54,482	30,093	23,005	1,384
Tangipahoa	14,241	4,265	9,382	76	401	512	10,702	3,548	6,759	66	257	328	8,552	2,734	5,624	194
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
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
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	312,824	420,882	9,321	25,359	29,944	587,486	253,077	303,527	7,054	17,931	20,708	490,388	214,938	260,095	15,354
	100.000%	40.297%	54.217%	1.201%	3.267%	3.857%	100.000%	43.078%	51.665%	1.201%	3.052%	3.525%	83.472%	43.830%	53.039%	3.131%
District 6																
Ascension	89,276	66,679	13,004	1,866	6,218	7,130	64,728	49,762	8,680	1,193	4,046	4,530	56,661	46,496	7,035	3,130
East Baton Rouge	224,608	135,042	59,893	11,918	14,994	17,738	182,183	114,495	45,225	9,239	11,022	12,945	135,401	94,203	30,946	10,252
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. Tammany	155,747	127,718	11,048	2,990	10,879	12,414	118,565	99,095	7,580	2,028	7,627	8,536	108,126	95,952	5,585	6,591
Tangipahoa	118,916	77,071	32,497	1,398	5,613	6,730	90,789	61,657	22,458	1,034	3,885	4,512	67,704	50,178	14,901	2,625
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	776,292	553,308	142,534	20,085	46,799	54,213	596,357	437,184	101,811	14,747	32,504	36,814	480,047	381,726	71,994	26,329
	100.000%	71.276%	18.361%	2.587%	6.029%	6.984%	100.000%	73.309%	17.072%	2.473%	5.450%	6.173%	80.497%	79.518%	14.997%	5.485%
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%

Split Parishes

DR: I A 2020 12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A6 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 1																
Iberia	19,810	14,843	3,594	308	805	977	15,065	11,575	2,517	186	588	675	13,985	11,246	2,311	428
Jefferson	238,074	153,014	31,164	11,614	38,020	47,477	190,739	128,160	22,912	8,769	27,680	33,978	146,178	114,226	13,051	18,901
Orleans	77,895	60,031	8,362	3,057	5,508	8,604	65,172	50,728	7,056	2,391	4,241	7,103	54,565	43,805	4,976	5,784
St. Charles	15,625	12,674	1,529	229	823	1,016	11,591	9,644	977	142	564	639	10,667	9,339	884	444
St. James	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Martin	1,368	1,285	13	7	29	44	1,154	1,091	11	5	17	31	993	979	1	13
St. Mary	40,282	23,841	10,537	725	3,669	4,155	30,553	19,029	7,490	525	2,440	2,710	23,965	16,557	6,016	1,389
St. Tammany	108,823	68,923	27,595	2,784	6,973	8,430	83,663	55,526	19,181	2,047	4,983	5,774	70,653	49,772	15,557	5,322
Terrebonne	109,580	69,934	23,147	1,743	6,119	7,358	82,505	55,631	15,796	1,239	4,089	4,701	61,720	45,395	11,566	4,759
District 2																
Ascension	37,224	14,462	19,212	434	2,621	3,253	27,229	11,374	13,459	321	1,732	2,131	23,256	10,304	11,779	1,173
Iberia	28,989	11,367	15,046	1,115	1,194	1,457	21,721	9,335	10,498	846	860	1,003	16,711	7,377	8,495	835
Jefferson	202,707	67,921	95,053	11,410	24,899	31,580	153,915	55,975	69,263	8,923	17,137	21,506	116,923	45,390	56,525	15,008
Orleans	306,102	66,431	210,607	9,799	16,536	22,413	241,024	59,524	159,012	8,129	12,167	16,053	201,679	48,181	136,549	16,949
St. Charles	36,924	20,876	12,399	608	2,486	3,125	27,950	16,510	8,913	387	1,737	2,098	24,318	14,970	7,913	1,435
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
Terrebonne	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 3																
Evangeline	23,988	18,552	3,854	176	1,164	1,222	18,192	14,131	2,726	132	1,013	1,037	15,120	12,680	2,170	270
Iberia	21,130	12,996	5,916	700	1,251	1,463	16,005	10,385	4,054	530	836	979	13,830	9,664	3,546	624
Lafayette	170,390	125,633	25,993	5,874	10,325	12,162	130,427	99,150	17,864	4,263	7,198	8,443	108,694	89,725	12,482	6,487
Natchitoches	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0
Rapides	81,311	61,240	12,643	1,807	3,209	3,704	62,331	48,168	8,866	1,321	2,153	2,394	51,587	42,445	6,715	2,428
St. Landry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary	9,124	3,108	5,454	110	292	369	6,968	2,565	4,030	68	201	244	6,245	2,155	3,875	218
Vernon	41,462	28,569	7,395	1,344	2,803	3,969	30,611	21,636	5,013	1,003	1,980	2,614	19,150	14,490	2,987	1,674
District 4																
Natchitoches	37,514	19,361	15,725	255	1,312	1,490	29,348	16,010	11,415	198	1,042	1,140	23,107	12,850	9,224	1,033
Ouachita	90,391	72,679	10,981	1,396	3,243	3,377	68,357	56,173	7,345	975	2,236	2,182	57,839	50,524	5,320	1,995
Vernon	7,288	6,518	216	98	207	206	5,650	5,129	120	71	149	126	4,910	4,692	24	193
District 5																
East Baton Rouge	232,173	61,027	153,505	4,507	11,168	12,813	173,429	49,386	111,565	3,360	7,573	8,594	143,863	44,029	93,729	6,105
Evangeline	8,362	2,802	5,381	65	76	114	6,216	2,329	3,757	55	48	74	5,433	1,886	3,473	74

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																
Lafayette	71,363	27,730	39,143	580	3,265	3,821	53,448	22,458	28,053	401	2,101	2,386	44,799	18,920	23,999	1,880
Ouachita	69,977	15,866	50,236	1,392	1,914	2,281	51,843	13,801	34,945	1,143	1,523	1,764	41,913	9,991	30,338	1,584
Rapides	48,712	16,270	29,949	621	1,182	1,386	36,461	13,205	21,339	465	941	1,048	28,589	10,387	17,060	1,141
St. Landry	82,540	43,611	35,836	499	1,958	2,178	61,811	34,209	25,497	353	1,301	1,374	54,482	30,093	23,005	1,384
Tangipahoa	14,241	4,265	9,382	76	401	512	10,702	3,548	6,759	66	257	328	8,552	2,734	5,624	194
District 6																
Ascension	89,276	66,679	13,004	1,866	6,218	7,130	64,728	49,762	8,680	1,193	4,046	4,530	56,661	46,496	7,035	3,130
East Baton Rouge	224,608	135,042	59,893	11,918	14,994	17,738	182,183	114,495	45,225	9,239	11,022	12,945	135,401	94,203	30,946	10,252
St. Tammany	155,747	127,718	11,048	2,990	10,879	12,414	118,565	99,095	7,580	2,028	7,627	8,536	108,126	95,952	5,585	6,591
Tangipahoa	118,916	77,071	32,497	1,398	5,613	6,730	90,789	61,657	22,458	1,034	3,885	4,512	67,704	50,178	14,901	2,625

Split Places

DR: I A 2020 12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A6 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 1																
Iberia																
New Iberia	6,721	5,218	944	106	344	446	5,186	4,153	618	74	258	318	4,576	3,888	512	175
Jefferson																
Kenner	53,996	27,898	8,914	3,538	12,712	15,817	42,114	23,022	6,368	2,656	9,366	11,448	31,378	20,046	4,265	7,073
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	77,895	60,031	8,362	3,057	5,508	8,604	65,172	50,728	7,056	2,391	4,241	7,103	54,565	43,805	4,976	5,784
St. Charles																
Boutte	314	219	63	7	17	27	229	158	46	6	12	15	354	251	81	19
Luling	10,166	8,087	1,044	184	625	776	7,454	6,096	674	115	416	468	7,040	6,149	576	319
St. Mary																
Baldwin	1,307	490	754	14	25	26	1,051	413	608	3	13	16	992	375	581	32
Franklin	1,027	630	326	4	30	42	790	517	220	4	24	36	729	493	212	29
Sorrel	115	93	16	1	4	1	84	74	6	0	4	0	70	56	14	0
St. Tammany																
Lacombe	7,399	4,945	1,643	88	527	532	6,061	4,180	1,289	67	380	369	5,252	3,751	1,129	373
Pearl River	2,533	2,136	121	32	169	172	1,967	1,690	79	27	122	119	1,734	1,538	111	85
District 2																
Ascension																
Gonzales	11,833	4,431	5,862	125	1,195	1,538	8,938	3,688	4,173	104	818	1,042	6,922	2,993	3,455	479
Prairieville	107	75	17	9	3	6	84	67	13	2	0	1	78	58	16	5
Iberia																
New Iberia	21,313	7,264	12,293	773	791	985	15,847	6,053	8,482	614	562	691	12,443	4,947	6,913	579
Jefferson																
Kenner	12,452	1,845	6,910	100	3,414	4,124	9,085	1,442	5,145	77	2,292	2,776	6,309	936	4,666	707
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
Orleans																
New Orleans	306,102	66,431	210,607	9,799	16,536	22,413	241,024	59,524	159,012	8,129	12,167	16,053	201,679	48,181	136,549	16,949
St. Charles																
Boutte	2,740	846	1,696	30	139	186	1,975	657	1,183	18	91	121	1,471	389	1,025	56
Luling	3,550	1,893	1,328	52	231	303	2,569	1,473	882	32	145	179	2,204	1,233	843	126

Split Places

DR: LA 2020 12 - CENSUS

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A6 v2

	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																
Evangeline																
Ville Platte	962	731	190	11	20	20	739	603	101	11	15	13	714	622	79	10
Iberia																
New Iberia	521	450	53	10	7	14	399	356	31	7	5	10	333	270	45	20
Lafayette																
Lafayette	84,924	61,986	13,028	3,471	5,206	6,251	68,128	51,394	9,314	2,669	3,774	4,515	55,897	46,156	6,098	3,652
Ossun	573	483	67	2	17	21	414	359	44	1	9	10	372	343	17	16
Scott	7,224	5,041	1,287	160	606	688	5,597	4,113	872	111	405	459	4,426	3,420	772	230
Rapides																
Alexandria	17,321	11,538	3,977	914	604	690	13,503	9,397	2,789	686	426	490	10,893	8,233	1,945	738
Pineville	8,263	5,410	2,204	192	266	320	6,487	4,419	1,579	156	186	222	4,978	3,848	906	239
St. Mary																
Baldwin	455	29	400	8	9	10	359	16	332	2	5	6	394	12	376	6
Franklin	5,701	1,815	3,537	53	196	258	4,283	1,509	2,548	28	130	161	3,724	1,298	2,282	151
Sorrel	596	247	322	1	22	26	472	204	247	0	17	18	421	163	247	14
District 4																
Ouachita																
Brownsville	4,337	2,424	1,314	36	465	509	3,318	2,023	887	28	303	327	2,221	1,531	610	81
Monroe	9,035	7,478	981	208	243	248	7,065	5,967	689	149	156	149	6,516	5,863	415	238
Richwood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Swartz	2,165	1,521	527	15	52	59	1,600	1,177	332	15	33	35	1,361	1,146	173	48
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																
East Baton Rouge																
Baton Rouge	114,625	11,894	93,942	2,759	5,408	6,371	85,625	10,557	68,743	2,098	3,720	4,346	67,158	8,100	55,851	3,195
Evangeline																
Ville Platte	5,341	1,145	4,092	44	36	60	3,932	997	2,855	37	25	43	3,410	810	2,551	43
Lafayette																
Lafayette	36,450	8,591	26,326	244	1,030	1,280	27,900	7,429	19,420	193	683	830	23,553	5,748	16,849	964
Ossun	1,572	576	926	6	56	62	1,115	453	610	3	41	40	970	507	426	44
Scott	895	642	171	16	46	49	653	487	115	14	24	26	475	258	188	20
Ouachita																
Brownsville	16	2	12	0	2	2	12	1	10	0	1	1	7	1	4	0

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 5																
Ouachita																
Monroe	38,667	7,120	30,076	751	498	740	28,393	6,280	20,995	611	327	475	23,706	4,018	18,854	843
Richwood	3,881	556	2,312	230	771	787	3,361	546	1,821	228	760	781	1,162	13	1,116	33
Swartz	2,189	1,410	654	30	51	47	1,654	1,150	425	24	26	22	1,466	868	541	56
West Monroe	4,059	958	2,824	32	190	239	2,917	836	1,899	24	115	157	2,227	635	1,485	109
Rapides																
Alexandria	27,954	5,252	21,754	243	476	585	21,020	4,503	15,837	175	340	398	17,022	3,193	13,205	615
Pineville	6,121	2,756	2,929	185	145	171	4,602	2,227	2,045	134	107	129	3,346	1,862	1,327	156
Tangipahoa																
Amite City	3,048	973	2,013	20	24	68	2,497	853	1,595	19	17	56	1,780	542	1,189	39
Independence	646	156	455	9	22	21	442	131	284	9	15	10	321	110	197	9
District 6																
Ascension																
Gonzales	398	213	131	9	41	40	287	163	82	6	32	23	253	195	43	9
Prairieville	33,090	23,831	5,236	1,076	2,416	2,763	23,508	17,379	3,548	695	1,545	1,701	21,168	16,827	2,957	1,385
East Baton Rouge																
Baton Rouge	112,845	68,097	32,155	5,488	5,796	7,147	94,615	59,083	25,318	4,551	4,597	5,654	65,628	44,267	16,623	4,723
St. Tammany																
Lacombe	1,258	658	463	16	97	113	897	499	308	5	68	65	700	499	153	46
Pearl River	32	28	2	1	0	2	27	23	2	1	0	2	22	22	0	0
Tangipahoa																
Amite City	957	686	228	13	25	20	736	551	152	11	18	16	678	562	99	18
Independence	989	587	341	1	49	55	754	470	244	0	29	36	618	405	187	25

Split VTDs

DR: LA 2020 12 - CENSUS

Plan: NAACPLDF Coalition CD Plan A6 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 1																
Jefferson																
116	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. James																
18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Mary																
11	151	59	82	3	6	8	114	56	49	3	5	6	87	50	31	3
St. Tammany																
701	1,868	1,106	537	33	149	149	1,528	943	414	23	117	109	1,166	715	359	90
Terrebonne																
65	1,130	610	405	9	58	54	871	512	289	6	33	36	662	417	217	28
District 2																
Ascension																
35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
40	2,270	1,151	983	26	89	109	1,586	846	660	17	47	63	1,666	1,029	569	68
Iberia																
5-4	332	213	84	2	23	26	263	178	61	0	21	15	219	177	29	9
Jefferson																
116	1,337	655	480	26	164	193	1,153	579	424	25	116	138	709	422	228	59
St. James																
18	1,433	940	455	1	28	25	1,145	749	363	1	23	19	1,069	665	393	11
Terrebonne																
65	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 3																
Iberia																
5-4	2,185	1,629	336	41	161	180	1,687	1,311	220	33	113	127	1,410	1,142	189	83
Natchitoches																
4-6	1	0	0	0	1	0	1	0	0	0	1	0	0	0	0	0
Rapides																
C21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C26	1,147	572	465	52	41	50	905	492	328	43	31	33	628	379	201	48
C30	1,420	905	424	24	49	51	1,159	798	287	17	41	41	837	612	178	47

Time: 12:29 PM

Split VTDs

Plan Type: Congress - Public Submissions

Plan: NAACPLDF Coalition CD Plan A6 v2

Page: 2 of 3

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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
Ascension																
35	1,908	1,693	48	12	116	145	1,398	1,269	34	2	69	85	1,290	1,223	24	43
40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
St. Tammany																
701	49	20	28	0	0	0	30	11	18	0	0	0	23	15	8	2

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  

LDF

DEFEND EDUCATE EMPOWER

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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

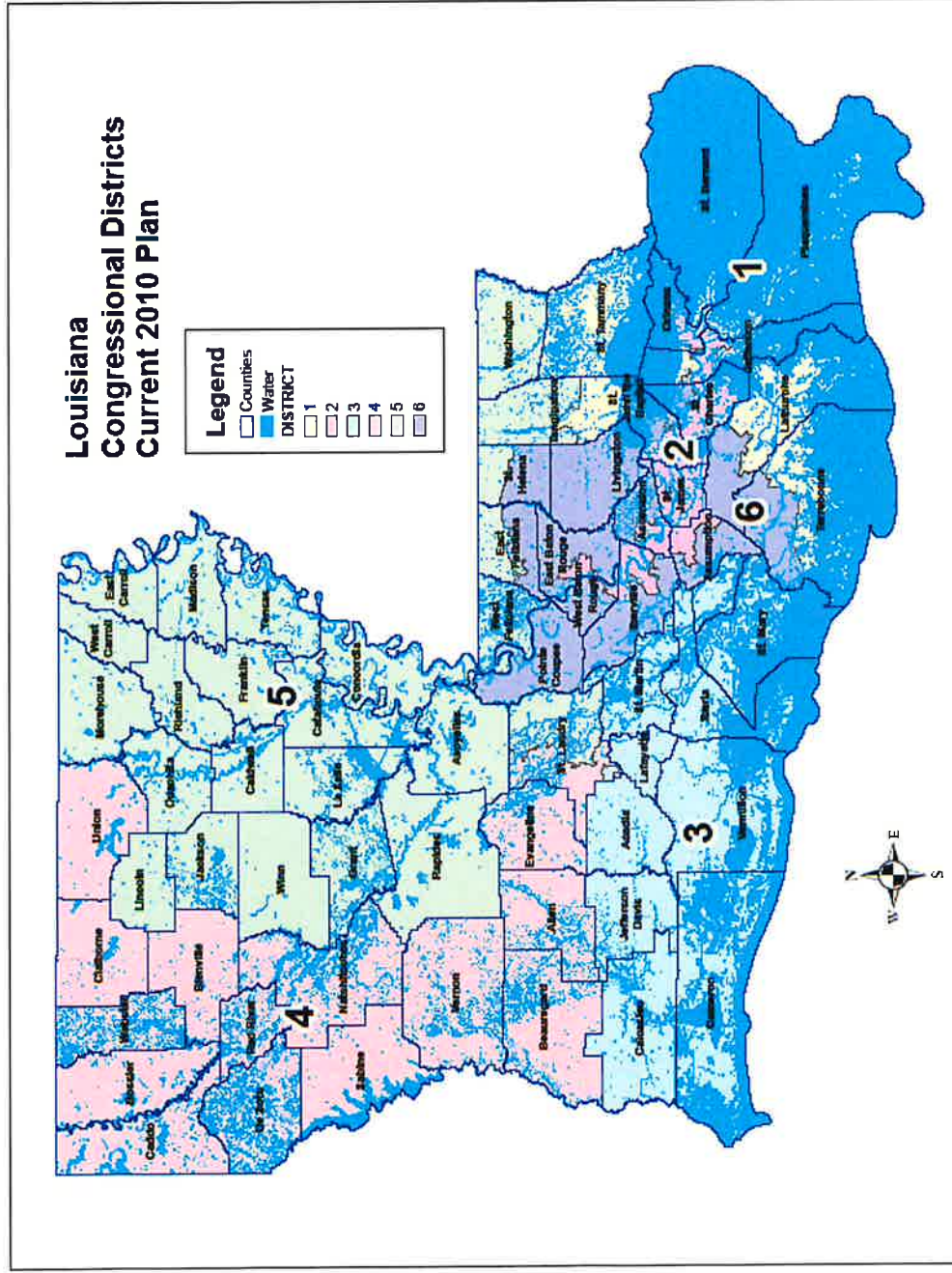
The Urban League of Louisiana's mission is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, and civil rights. As an affiliate of the National Urban League, and for over 83 years, the Urban League of Louisiana has worked to ensure quality education,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

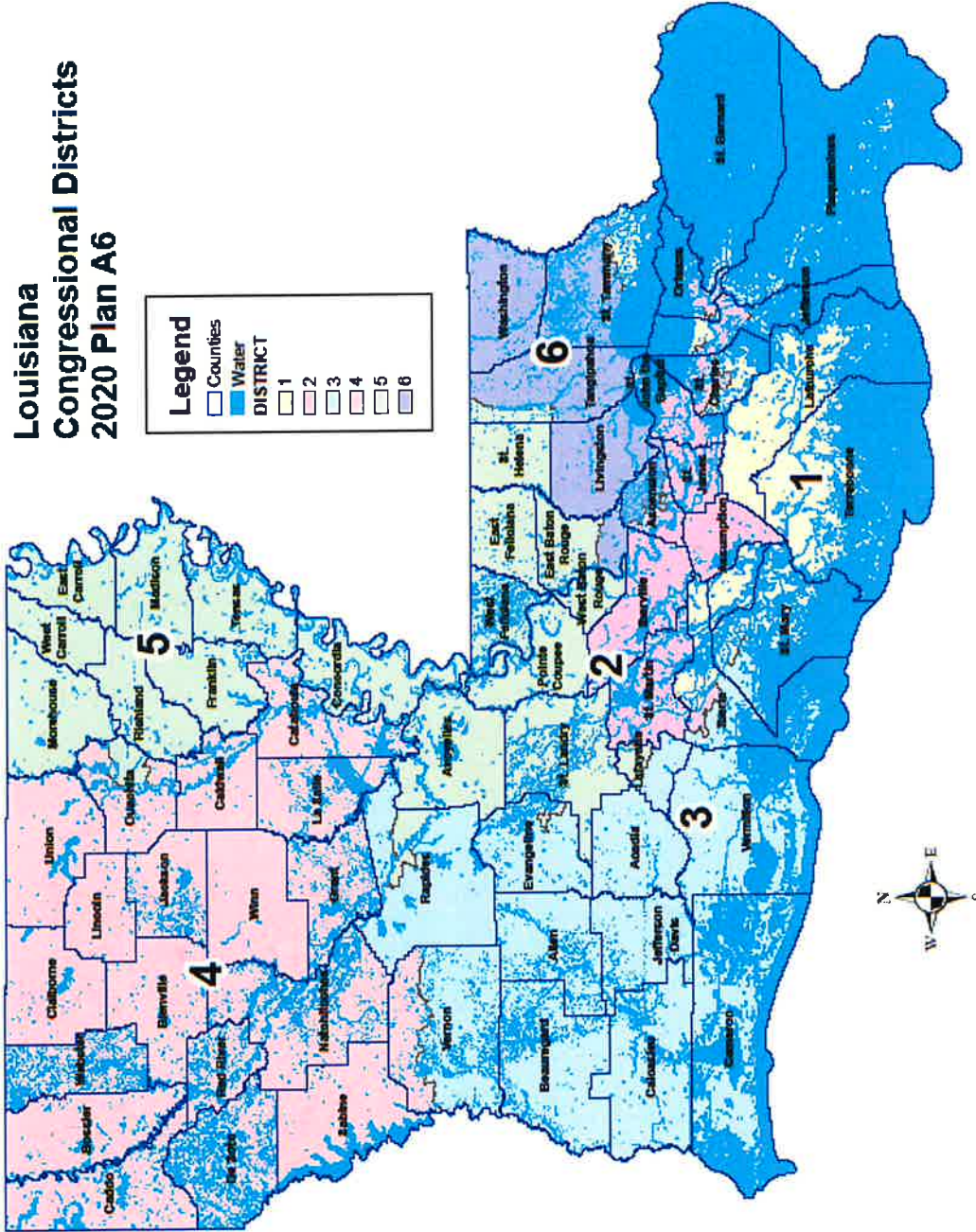
Crescent City Media Group

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





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 A6

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,293	0	64.13%	17.23%	604,170	67.19%	15.72%
2	776,294	1	32.95%	53.41%	598,799	35.77%	51.39%
3	776,292	-1	70.14%	19.69%	587,052	72.28%	18.24%
4	776,292	-1	57.73%	33.38%	596,684	59.99%	31.62%
5	776,294	1	39.68%	53.84%	587,486	42.50%	51.36%
6	776,292	-1	69.88%	18.07%	596,357	72.10%	16.86%

Plan A7

District	TTLPop20	Deviation	TTLWht20%	TTLBlk20%	VAP20	WhtVAP20%	BlkVAP20%
1	776,294	1	66.02%	15.42%	604,283	68.67%	14.18%
2	776,293	0	33.72%	53.52%	599,806	36.63%	51.38%
3	776,293	0	69.64%	20.19%	586,736	71.84%	18.66%
4	776,292	-1	57.60%	33.41%	596,316	59.87%	31.66%
5	776,293	0	39.72%	53.80%	589,975	42.54%	51.23%
6	776,292	-1	67.80%	19.28%	593,432	70.42%	17.91%

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%

Louisiana

Congressional Districts

2020 Plan A6

