

# MICRC Public Feedback Overview

## through August 8, 2021



MGGG Redistricting Lab

### Contributors

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## Introduction

This report was prepared by members of the MGGG Redistricting Lab at Tisch College of Tufts University to summarize submissions regarding Michigan redistricting to the [MICRC Public Comment Portal](#).

	<b>WRITTEN</b>	<b>theory</b>	<b>COI</b>	<b>DISTRICTS</b>	<b>CD</b>	<b>SD</b>	<b>HD</b>	<b>COI MAP</b>
Week 1	<b>23</b>	15	4	<b>12</b>	9	1	2	<b>6</b>
Week 2	<b>70</b>	34	24	<b>30</b>	20	5	5	<b>6</b>
Week 3	<b>36</b>	18	17	<b>15</b>	12	2	1	<b>2</b>
Week 4	<b>63</b>	22	38	<b>21</b>	12	4	5	<b>8</b>
Week 5	<b>35</b>	19	13	<b>8</b>	8	0	0	<b>5</b>
Week 6	<b>40</b>	13	18	<b>28</b>	19	4	5	<b>15</b>
Week 7	<b>78</b>	40	47	<b>30</b>	18	5	7	<b>14</b>
Week 8	<b>69</b>	44	33	<b>39</b>	16	10	13	<b>11</b>
Week 9	<b>182</b>	89	100	<b>63</b>	10	27	26	<b>18</b>
Week 10	<b>16</b>	9	5	<b>13</b>	9	3	1	<b>3</b>
Week 11	<b>36</b>	9	22	<b>16</b>	6	6	4	<b>5</b>
Week 12	<b>20</b>	7	13	<b>23</b>	8	6	9	<b>64</b>
Week 13	<b>49</b>	23	19	<b>81</b>	46	12	21	<b>170</b>
Week 14	<b>33</b>	9	14	<b>24</b>	13	3	8	<b>29</b>
TOTAL	<b>750</b>			<b>405</b>	208	88	107	<b>356</b>

**Table 1.** Summary of Submissions

## Notes on the summary table

- We've tried to classify the written testimony into two main kinds: *theory of gerrymandering*, such as what kinds of principles would make for fair or unfair redistricting; and *COI descriptions*, which are usually narrating the locations and characters of communities and how they should be handled, but without an accompanying map. Note that these two types don't add up to the whole, because some submissions defy this classification, or fall under both categories.
- Districting plans, however, do add up as either Congressional districts (CD), Senate districts (SD), or House districts (HD).
- For each kind of submission we've recorded the total number of comments for the week as of now. Note that these numbers may change in the future when people go into the portal and add new comments to older submissions.
- The number of submissions by week may be slightly different than what is reported in the portal [search tool](#) because of time zone discrepancies.

## Overall themes and comments

1. Every week, there has been more written testimony than map-based testimony. Many written testimony submissions describe COIs, and we recommend reaching out to the submitters to encourage them to attend mapping trainings.
2. There is a lively mix of support and criticism of the COI-based approach to redistricting.



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3. Themes we see included every week include district shape, partisanship, COIs, county/city boundaries, and the urban/rural divide.



## 1 Week 1: May 1–7

44 submissions: 23 Written, 12 Districting, 6 COI Map, 3 File/Link

Major themes this week included COIs and process. With 11 out of 24 written submissions on the topic, the biggest single topic this week was the request/demand that MICRC require commenters to disclose identifying information, including name and physical address, to verify that input is submitted by Michigan residents.

Other themes included district shape, concerns about partisanship and representation, and competitiveness.

One commenter asked if the new districts will be established by the 2022 elections.

## 2 Week 2: May 8–14

120 submissions: 70 Written, 30 Districting, 6 COI Map, 14 File/Link

Themes this week included COIs, process, district shape, preserving political boundaries, and concerns about partisanship and representation.

COIs: The bulk of written submissions were COI descriptions. Many of the COIs submitted this underscored the importance of preserving counties and townships. With respect to COIs and political boundaries, one commenter wrote: “I think the redistricting commission should not just be asking about communities of interest. They should also be asking about the other side of the coin: If your county, city, township, etc. needs to be split, where does it make the most sense to make the split?”

Shape: Commenters emphasized the importance of four-sided, rectangular districts. One commenter suggested that line-drawers create longer, narrower, lake-oriented districts along the Great Lakes.

Process: A few more comments addressing ID talking about address identification (×3), and a few comments about commission procedure and contracts and the portal interface (×5). Three commenters just want to thank the commission!

Boundaries: Commenters emphasized preserving county boundaries and school districts.

## 3 Week 3: May 15–21

56 submissions: 36 Written, 15 Districting, 2 COI Map, 3 File/Link

The bulk of written submissions were COI descriptions. Many of the COIs submitted this week explained the importance of preserving a particular county or township. One commenter suggested that communities bordering the Great Lakes are not adequately reflected in the current districts.

Other themes in the comments included district shape, preserving of political boundaries, and concerns are partisanship and representation, and use of algorithms.



Process: Three commenters wrote in support of the Commission's work. One commenter requested that outreach continue after 2022, and another expressed concern about processing large quantities of public comment.

Shape: Commenters emphasized a preference for compact, square districts that preserve counties and townships.

## 4 Week 4: May 22–28

101 submissions: 63 Written, 21 Districting, 8 COI Map, 9 File/Link

This was a big week, driven heavily by a redistricting public forum that was held on May 25 in Midland. 18 written submissions came directly from that forum.

Themes included district shape, preserving political boundaries, and concerns about partisanship and representation.

Shape: At least eight comments referenced existing shapes or requested square districts.

Boundaries: At least nine comments referenced the importance of preserving county and municipal boundaries. Two comments emphasized the importance of school districts, with one commenter suggesting the use of school district boundaries as building blocks.

## 5 Week 5: May 29–June 4

52 submissions: 35 Written, 8 Districting, 5 COI Map, 4 File/Link

Themes this week included COIs, process, district shape, preserving political boundaries, and concerns about partisanship and representation.

Process: Commenters thanked the Commission. A small theme this week emerged with several commenters suggesting that the best practice for redistricting this year is to wipe the slate clean, discarding previous districts and drawing the new boundaries "from scratch." (Others, in contrast, have been referencing existing districts to suggest modifications.)

Shape: At least six commenters referenced district shape, such as by endorsing compact, square, or convex shapes.

Partisanship: Many commenters expressed concern about partisan gerrymandering and representation. One person emphasized that the distribution of congressional seats should reflect the state as a whole (i.e., partisan proportionality).

## 6 Week 6: June 5–11

84 submissions: 40 Written, 28 Districting, 15 COI Map, 1 File/Link

This week, themes included COIs, process, district shape, preserving political boundaries, and concerns about partisan gerrymandering.



COIs: At least one commenter expressed concern that COIs could be partisan.

Process: Commenters thanked the commission and suggested that you take advice from a professor named Moon Duchin. (Honest, we did not plant that one!)

Shape: At least six commenters referenced district shape, with some citing the current "odd" shapes and expressing a preference for more compact, square shapes.

Partisanship: Numerous commenters expressed concern about partisan gerrymandering and representation, with a preference for partisan proportionality cited again. Four comments referenced concerns about "safe" seats and would prefer more competitive districts.

## 7 Week 7: June 12–18

126 submissions: 78 Written, 30 Districting, 14 COI Map, 4 File/Link

Themes this week included COIs, district shape, respecting political and geographic boundaries, and concerns about partisanship and representation.

COIs: Many of the written submissions were COI descriptions. Within the COI-type submissions, sub-themes of economic narratives and community ties emerged. Several of the COI descriptions were written as personal narratives from the submitter and the community they were describing, usually their home for many years. These narratives often spoke about the economic hardships and recoveries that the area experienced over the years, changing socioeconomic areas, and other defining community aspects such as neighborhoods, immigrant communities, and school districts. ([Submission w755](#))

In contrast to the large group of comments describing COIs, there were also a handful of submissions that voiced their opposition to the prioritization of COIs in the redistricting process at all. ([Submission w1083](#))

Shape and boundaries: Many comments emphasized the need to get rid of the current misshapen districts in Michigan and replace them with more compact, logical shapes. Complaints about the current shapes were often explicit mentions of their gerrymandered appearance, and many commenters remarked that these shapes divided what they viewed as their community, especially when towns were divided. One submission specifically focused on the burden to election administration of having mismatches between districts, precincts, and counties. ([Submission w1318](#))

Partisanship and representation: Many commenters expressed discontentment with their current districts and representation. One commenter writes about his experience living in different districts in the Detroit area, where he has noticed communities in districts together that he does not view as cohesive. ([Submission w734](#)) This example mirrors many other submissions in which commenters suggest a subset of towns or areas they see as belonging to their community that should be districted together, as opposed to many pairings in current districts that they do not see as part of their community.



## 8 Week 8: June 19–25

123 submissions: 69 Written, 39 Districting, 11 COI Map, 4 File/Link

There are multiple concerns about "packing and cracking" and the creation of gerrymandered partisan maps. There was a clear emphasis on creating maps that would maximize competitiveness between the two parties. Competitive districts (or those drawn without partisan intent) are said to encourage bipartisan communication, compromise, and healthy dissent. ([Submission w1001](#))

Several commenters argue that districts should be composed of communities that have things in common, and where communities differ greatly, separations should be drawn; communities should be grouped together as compactly as possible.

Non-partisanship was important to many in the process to create fair maps, and fair representation and voting access for all citizens is crucial. Fairness regarding race and partisanship was also a present theme in some submissions.

## 9 Week 9: June 26–July 4

294 submissions: 182 Written, 63 Districting, 18 COI Map, 31 File/Link

The Coalition Hub to Advance Redistricting and Grassroots Engagement (CHARGE) is anchored by nine national organizations: APIAVote, Center for Popular Democracy, Common Cause, Fair Count, League of Women Voters, Mi Familia Vota, NAACP, National Congress of American Indians, and State Voices. CHARGE held a training workshop July 1, which we believe drove a high rate of submissions. This week saw a massive increase in overall volume, with more than twice as many submissions as any previous week. Themes included COIs, boundaries, and public service areas.

There was also a major increase in the number of districting plans submitted, and a shift: instead of having mainly Congressional plans, this week saw a large number of Senate and House plans (27 and 26 submissions, respectively—nearly as many as in the first eight weeks combined).

**COIs:** Many commenters described the ties (or lack thereof) between their city and its neighbors, in order to suggest which should or should not be kept in a common district. As one example of a fairly common theme, one submitter states that they "feel very little in common with the other places in my current Senate district" and lists other counties they would prefer to be grouped with. ([Submission w899](#))

**Boundaries:** Several commenters shared that they are suspicious of COIs as a redistricting method, and that they will foster racial and political division. They state their preference for relying on pre-existing political boundaries, such as townships, counties, or school districts.

**Service areas:** Commenters this week expressed a desire for their municipality and utility service areas to be taken into consideration. In one such example, the writer states that "the cities of Grandeville and Wyoming are closely intertwined through agreements of shared water and sewer services; connected emergency fire services; and an overlapping school district. Due to the shared interest of these communities, it makes sense to have a shared legislative representative and advocate in Lansing." ([Submission w1273](#))



## 10 Week 10: July 5–11

32 submissions: 16 Written, 13 Districting, 3 COI Map, 0 File/Link

This week, the number of submissions dropped back down to earth. Themes this week included economic and environmental concerns.

Geography: Geography and district shape continued to play an important role in many submissions. Urban vs. rural ([Submission w1394](#)) ; Compactness ([Submission w1409](#)).

Consistency: Several commenters expressed a desire to keep the existing districts unchanged ([Submission w1416](#)). We note that this is not permitted by federal law.

Economic activity features in many community descriptions. Personal narratives and social and ethnic affinity structure how many people view their communities and the opportunities afforded by independent redistricting ([Submission w1462](#)). Commenters mentioned pollution and other environmental concerns when describing their communities. These issues are often cited in tandem with industrial presence ([Submission w1405](#)).

## 11 Week 11: July 12–18

68 submissions: 36 Written, 15 Districting, 5 COI Map, 3 File/Link

This week, a number of very similar comments described a COI in the Tri-Cities area. These are likely to have come from a coordinated campaign. These commenters called for making the Tri-Cities a single district, emphasizing similar cultural and economic interests, detailing cultural events, major employers, and media outlets ([Submission w1520](#)), ([Submission w1485](#)). Frequently they included a specific list of local media outlets: "Midland, Bay City, Saginaw, and Flint are a community of interest because they share news and radio stations (WNEM, WEYI, WJRT, WSGW, WIOG, WCEN, WHNN, WKQJ)," a list of local employers: "Some regional corporations that operate in the Tri-Cities and Flint are Michigan Sugar, General Motors, Dow Chemical, and S.C Johnson," and cultural centers: "They share cultural events and sports such as Dow Diamond with Great Lakes Loons, Midland Center for the Arts, Dow Event Center with Saginaw Spirit." A few other notable Tri-Cities submissions pointed to cohesiveness as residents travel within the Tri-Cities to go to restaurants, receive healthcare, or work ([Submission w1479](#)).

Other popular topics included geography, partisanship, and contiguity.

Geography: Several people mentioned wanted to keep rural and urban areas separate, a common theme across the weeks ([Submission w1501](#)), ([Submission w1480](#)).

Contiguity: Some commenters specifically wanted their community to merge with an adjacent area in a district ([Submission w1480](#)), ([Submission w1449](#)).

A few commenters explicitly mentioned their confidence in the commission! ([Submission w1507](#)), ([Submission w1474](#))



## 12 Week 12: July 19–25

112 submissions: 20 Written, 23 Districting, 64 COI Map, 5 File/Link

This week, a large number of COI submissions mentioned being prompted to draw by an email from MICRC ([Submission c1628](#)). A few submitters expressed concerns about being emailed to submit a COI map, despite the fact that they had previously submitted testimony against the concept of COIs ([Submission w1551](#)). However, the emails were generally greeted with positive responses. The number of COIs submitted this week surpassed the number submitted in any previous week.

Themes seen in this week submissions include preserving geography and compactness, geographic groupings and divides, and an emphasis on schools and water-based communities as COIs.

A few more Tri-Cities submissions appeared this week, along the same lines as last week's set ([Submission w1528](#)).

**Preserving Geography and Compactness:** Many people expressed support for drawing districts which followed existing boundaries such as city or county lines. People thought preserving these boundaries would help produce compact districts as well as prevent confusion ([Submission w1561](#)).

**Geographic groupings and divides:** Several submitters described their COIs in terms of what communities they thought should be put together in the district, either for similar uses such as economic activity ([Submission w1574](#)), based on political and social values ([Submission w1596](#)), or united by ethnic and linguistic backgrounds ([Submission w1530](#)). The divide between rural and urban areas was discussed again in this week's comments. These comments were largely from rural regions wary of being lumped into a district with cities they felt had fundamentally different values and concerns. One commenter summarized some unifying issues for rural communities, such as energy sources, public transportation and schools, healthcare and emergency services, and rural crime ([Submission w1617](#)). Other commenters expressed concerns that the voices of urban residents were not being heard due to being "diluted" by being districted with large swaths of rural areas ([Submission w1627](#)). Overall, many comments and maps concerning geographic divides and ideal community groupings were created in response to dissatisfaction with how these divisions and groupings exist in the current districts.

Another recurring theme was schools. Many people brought up schools as a major unifying factor in their COIs. Some specifically emphasized the value of preserving school districts in district maps, with one writing "This is one community of interest which I think most Michiganders would agree on, as school districts should be united when electing their government leaders and in their political representation." ([Submission w1562](#))

Many COI maps emphasized the importance of water and proximity to lakes. Some submitters mentioned specific concerns experienced by residents of lakeshore communities, such as "extreme climate events, resulting erosion, and a seasonal economy related to the ups & downs of tourism." ([Submission c1610](#)) Others mentioned that lakes brought their community together. ([Submission c1595](#))



## 13 Week 13: July 26–August 1

300 submissions: 49 Written, 81 Districting, 170 COI Map, 0 File/Link

This week saw the highest yet level of participation: a record number of districting plans, and more COI maps than the previous twelve weeks combined! The MDOS outreach to earlier submitters continues to pay off, as many of the COI maps correspond to earlier written submissions. Like last week, a few commenters expressed concerns that communities of interest are not a valid consideration for designing districts. For instance, one submission ([Submission w1720](#)) provocatively titled "A better plan than Draw Your Own Ghetto" worries that communities of interest are "a euphemism for a segregated neighborhood" and argues for more "objective" methods. We note that COI consideration is a requirement in the recent Michigan constitutional amendment that created the commission.

Partisan gerrymandering was a common complaint among many submitters. Some comments advocated for drawing more competitive districts (and fewer safe districts) ([Submission w1703](#)), or removing partisan considerations from district drawing entirely ([Submission w1781](#)). We continue to see submissions that argue for a clean break from the old districts ([Submission w1858](#)).

Geographic groupings and divides: The difference in interests between cities and rural communities remained a popular subject in this week's submissions. This sentiment most often came from residents of rural communities who did not want to be placed in a district with urban communities that they feel they have little in common ([Submission c1789](#)). Other comments indicated agriculture as an especially important concern ([Submission c1787](#)). Many submissions simply listed, or outlined in the case of maps, several communities that they thought should be grouped together in a district, such as this example in Kalamazoo ([Submission c1660](#)). Others detailed socially or economically uniting factors for their listed areas ([Submission p1767](#)). "Culture" was a commonly cited unifying factor, although quite broad ([Submission c1690](#)). One person described the difficulty of becoming politically engaged when your community is split into multiple districts ([Submission w1881](#)).

Communities surrounding schools remained one of the most frequently mentioned elements for COIs. Many submitters expressed that they had a common interests with others who shared their school district or lived in a school-focused community, such as a University town ([Submission c1835](#)). The interrelated resources provided by individual school districts and county-level school resources serve the greater community in many aspects, as described in this detailed community submission along the Ohio border ([Submission c1790](#)). The views that schools spawn and sustain larger communities around them support keeping school districts and towns intact when drawing districts.



## 14 Week 14: August 2–8

88 submissions: 33 Written, 24 Districting, 29 COI Map, 2 File/Link

Submissions this week included a fairly even split of written testimony, districting plans, and COI maps. General calls for stopping gerrymandering and drawing fair maps continued to appear, as in past weeks ([Submission w2028](#)), ([Submission w2037](#)). Some submissions advocated for more equitable districts in terms of diversity and racial equity ([Submission w1998](#)), with one submitter writing, "As a... 2nd generation Asian American, I am concerned about [minority representation]... Dividing metropolitan areas disenfranchises... minorities and immigrants... This is institutional racism and I hope this commission will address this inequity." ([Submission w2001](#)).

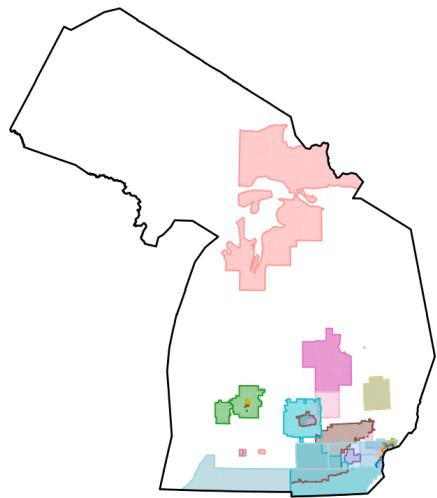
One of the most notable submissions this week was from the Michigan AFL-CIO, which sent a link with their own plans for districts and a 237-page analysis ([Submission o1993](#)). They met with several interest groups to learn about their communities of interest and ideas for improving current maps. They also conducted research into topics that may inform political interests, such as commuter patterns, agricultural regions, and economic data. The AFL-CIO's submission generated lively discussion in the portal, both in comments on the submission and in written testimony. Most responses supported the plans, with many calling them fair and representative ([Submission w2002](#)).

Like in previous weeks, there were a large number of written comments advocating for the Tri-Cities to be considered as a COI, and kept together when drawing districts. They mentioned similar points, such as their shared sports teams, schools, and economies ([Submission w2020](#)), ([Submission w2018](#))—this closely mirrors the structure of Tri-Cities submissions from previous weeks ([Submission w1520](#)).

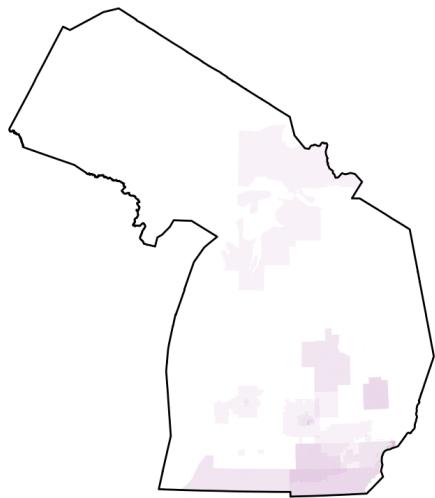
Although not often the main theme of submissions, the topic of *municipal and community services* as factors that unite or define COIs has been a common thread across the weeks. One submission this week mentioned utilities, sewer systems, and transit in particular ([Submission p1998](#)). Another submission this week described a large neighborhood association in Detroit, which brought their community together by working with nonprofits, local businesses, and city and state government to provide the community assistance with everything from nutrition to household maintenance ([Submission p1971](#)). Although community organizations like these are small, they may be helpful in localizing COIs are within cities. One submission this week mapped an area that is coextensive with a Detroit city council district, describing new employment and development in the area. The submitter writes, "These communities have worked and stayed together through the tough times and have no intention of breaking up." ([Submission p1973](#))

Several Michiganders who live near watersheds spoke out against districts that split their communities. One described the connection between the River Raisin Watershed and Monroe, Jackson, and Lenawee counties, which share "many similar interests - environmental, recreational, [and] economic" ([Submission c2052](#)). Another wrote of her community's environmental concerns around the Huron River Watershed, and the importance of recognizing the Watershed as a unified district ([Submission o1985](#)). Keeping areas of environmental significance intact when drawing districts is a theme that has come up across several weeks with different examples.

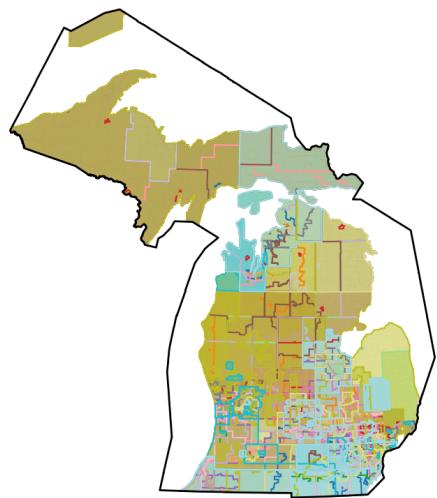
## 15 COI coverage maps



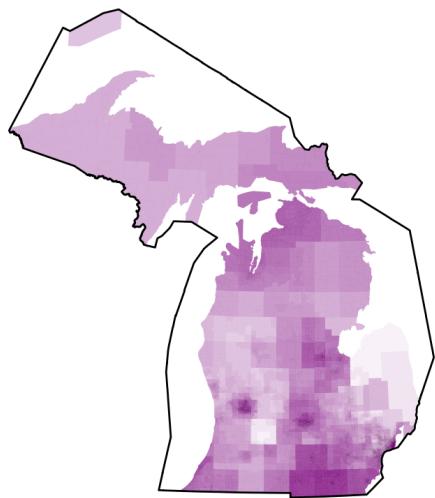
Week 14 COIs (34 areas)



Week 14 COI Heatmap

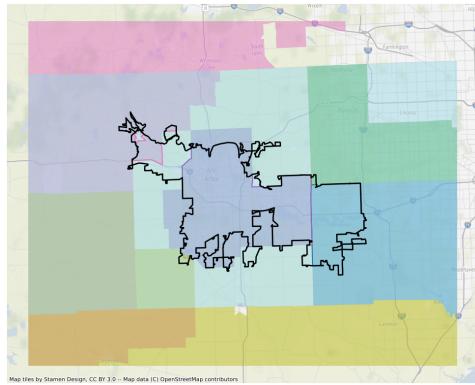


Cumulative COIs (419 areas)

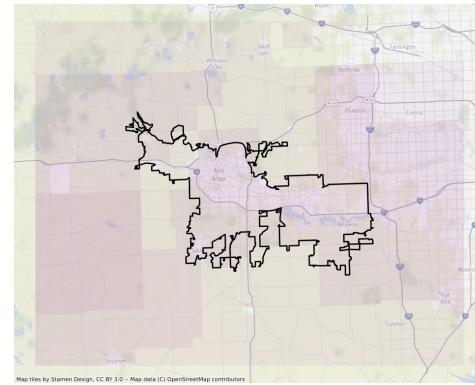


Cumulative COI Heatmap

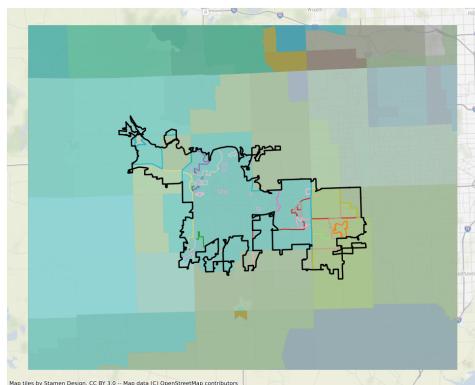
**Figure 1.** Michigan Communities of Interest



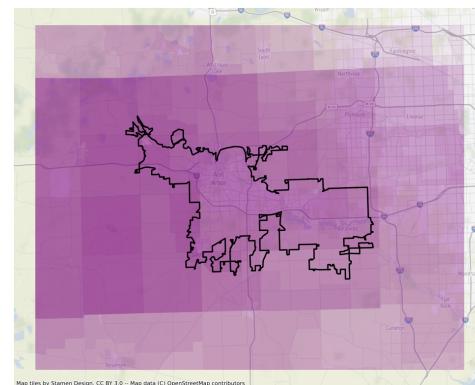
Week 14 COIs (6 areas)



Week 14 COI Heatmap

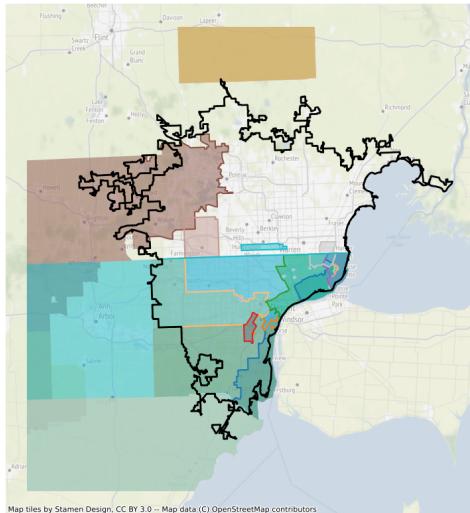


Cumulative COIs (40 areas)

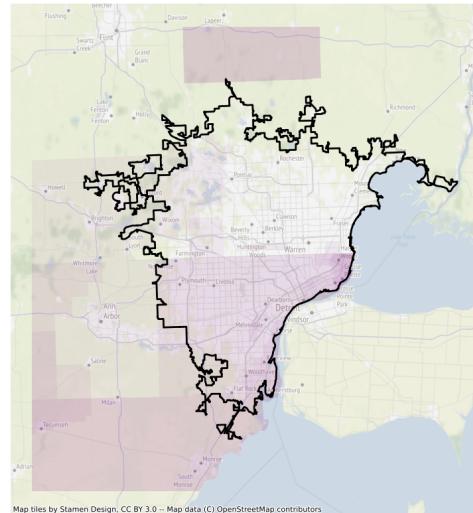


Cumulative COI Heatmap

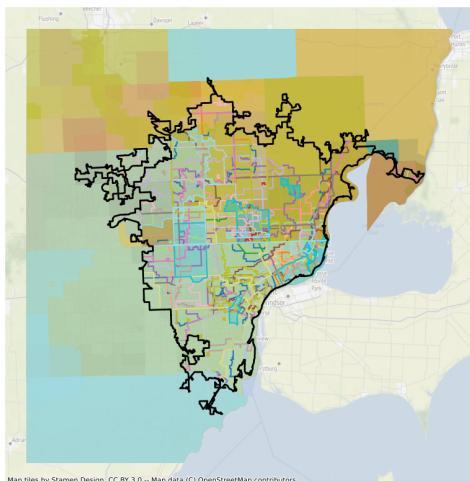
**Figure 2.** Ann Arbor Communities of Interest with outline of Ann Arbor metro area



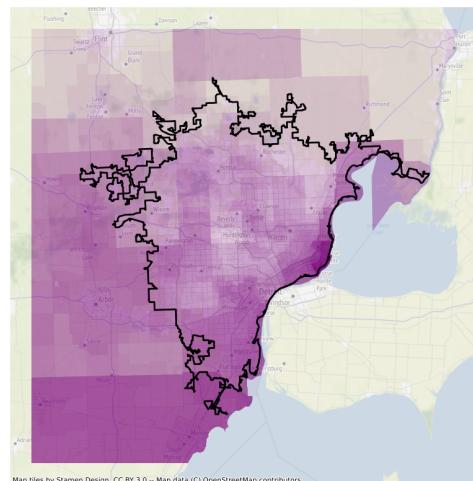
Week 14 COIs (19 areas)



Week 14 COI Heatmap

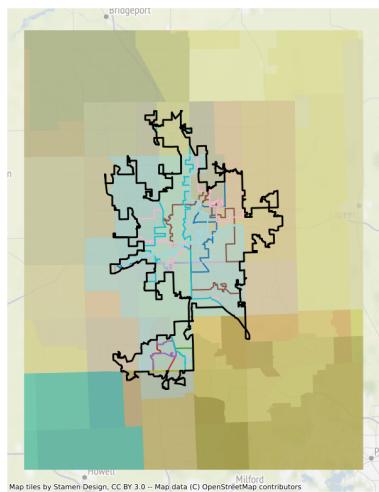


Cumulative COIs (198 areas)

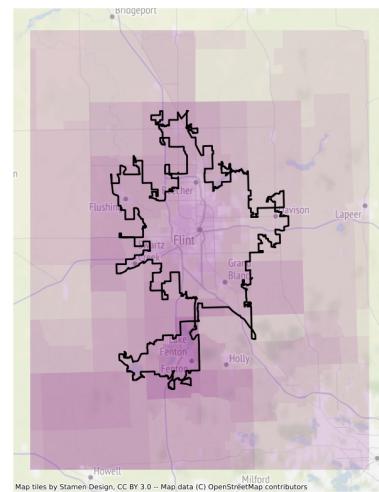


Cumulative COI Heatmap

**Figure 3.** Metro Detroit Communities of Interest with outline of Detroit metro area

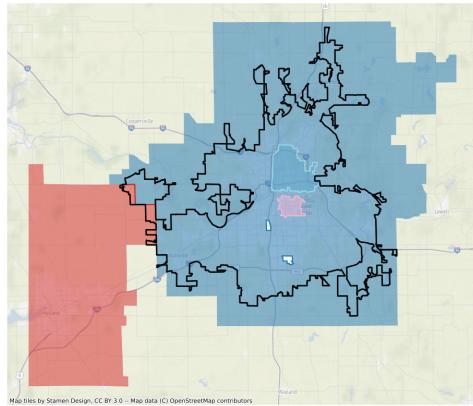


Cumulative COIs (28 areas)

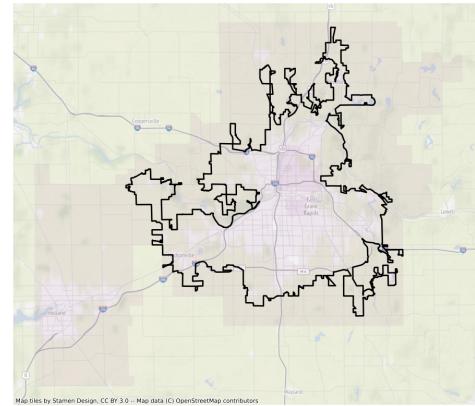


Cumulative COI Heatmap

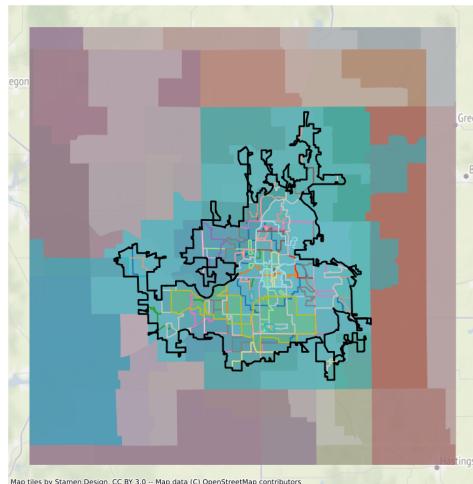
**Figure 4.** Flint Communities of Interest with outline of Flint metro area



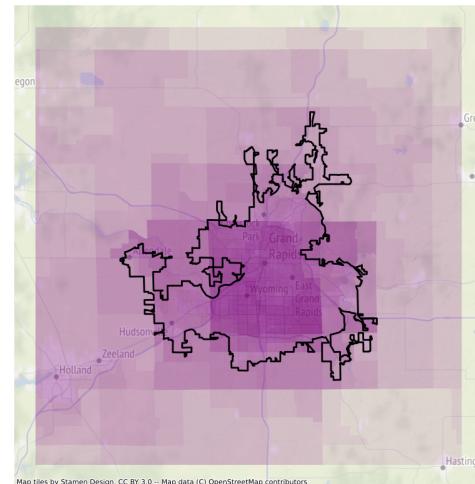
Week 14 COIs (4 areas)



Week 14 COI Heatmap

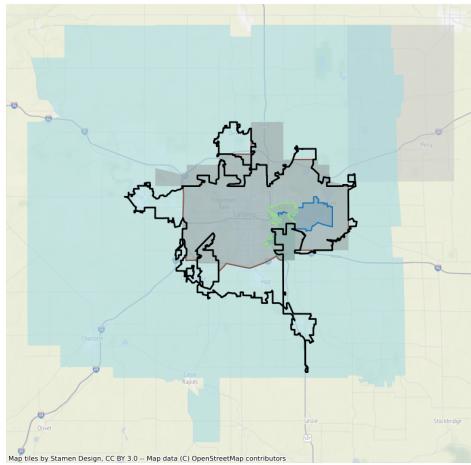


Cumulative COIs (39 areas)

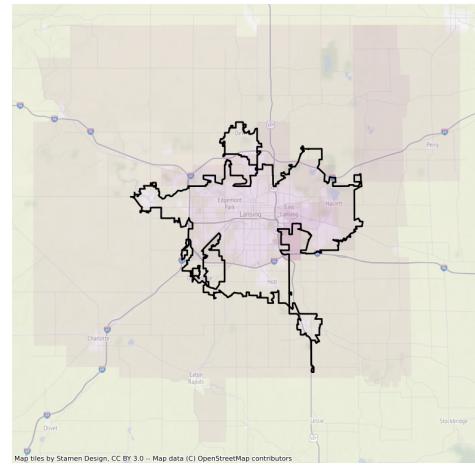


Cumulative COI Heatmap

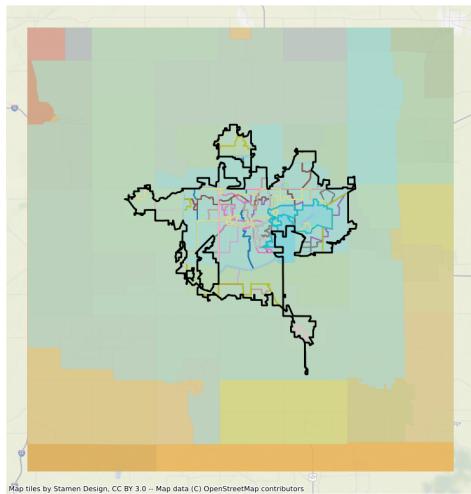
**Figure 5.** Grand Rapids Communities of Interest, with outline of Grand Rapids metro area



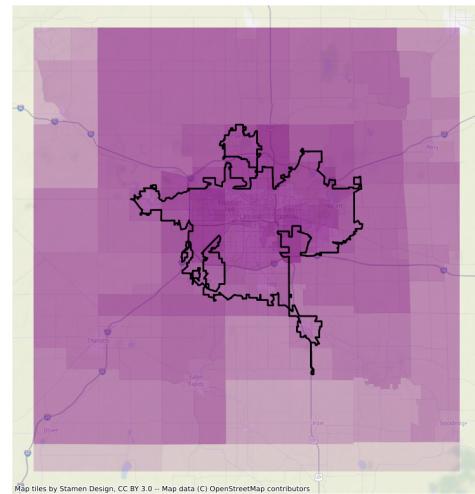
Week 14 COIs (5 areas)



Week 14 COI Heatmap

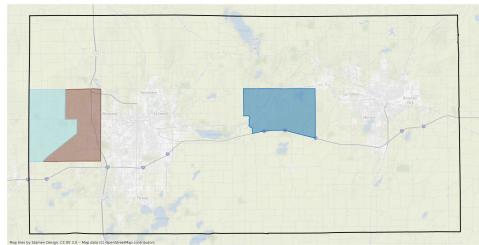


Cumulative COIs (50 areas)



Cumulative COI Heatmap

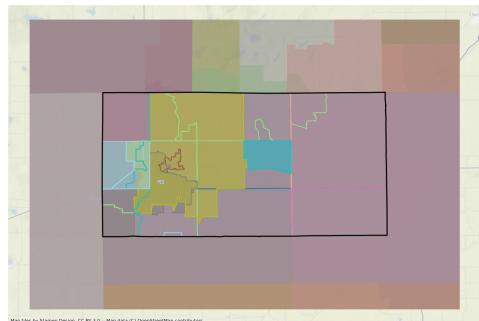
**Figure 6.** Lansing Communities of Interest, with outline of Lansing metro area



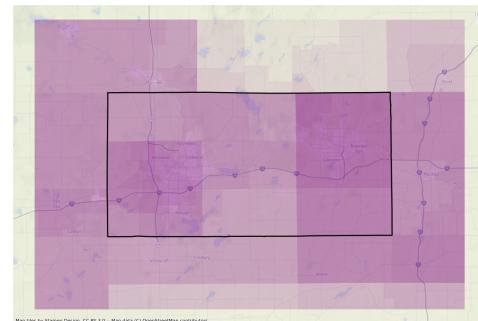
Week 14 COIs (3 areas)



Week 14 COI Heatmap

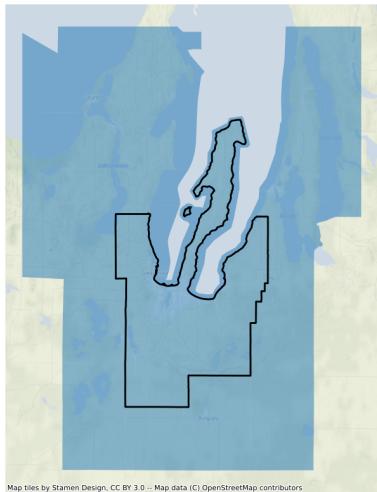


Cumulative COIs (32 areas)

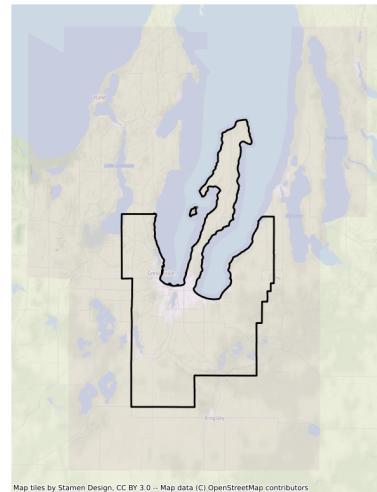


Cumulative COI Heatmap

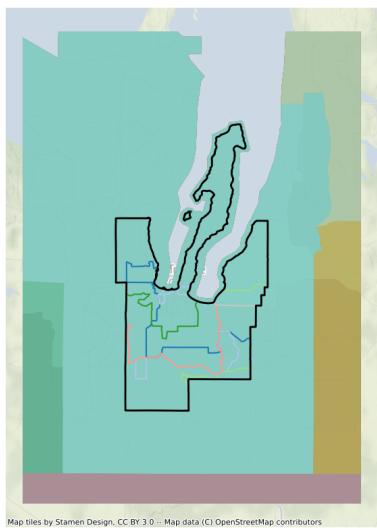
**Figure 7.** Kalamazoo/Battle Creek Communities of Interest



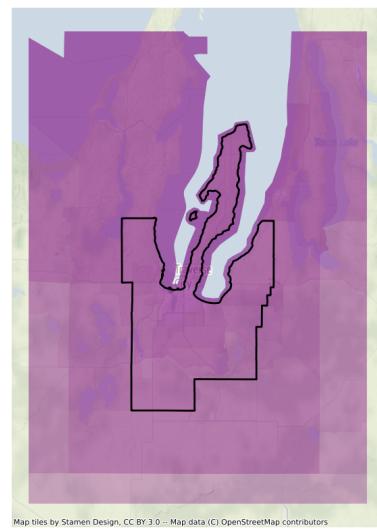
Week 14 COIs (1 area)



Week 14 COI Heatmap

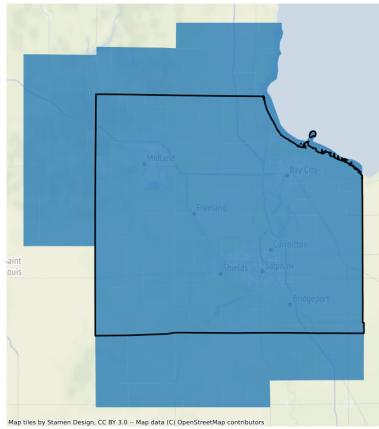


Cumulative COIs (19 areas)

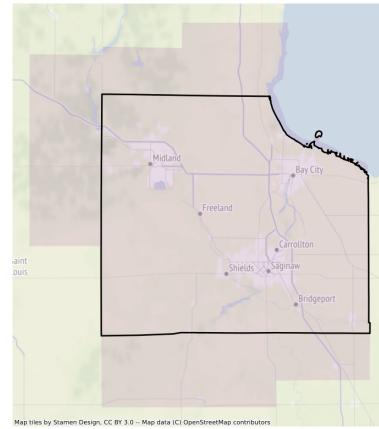


Cumulative COI Heatmap

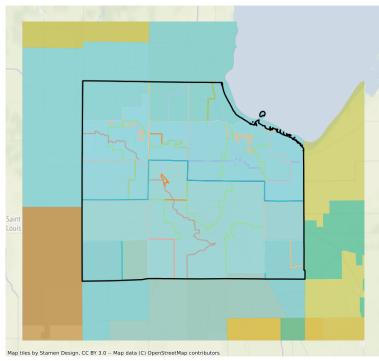
**Figure 8.** Traverse City Communities of Interest, with outline of Traverse City



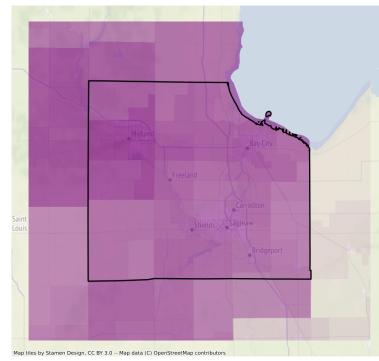
Week 14 COIs (1 area)



Week 14 COI Heatmap

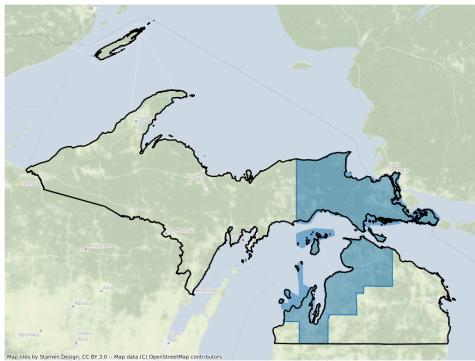


Cumulative COIs (33 areas)

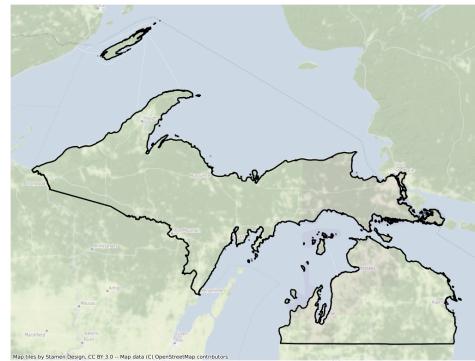


Cumulative COI Heatmap

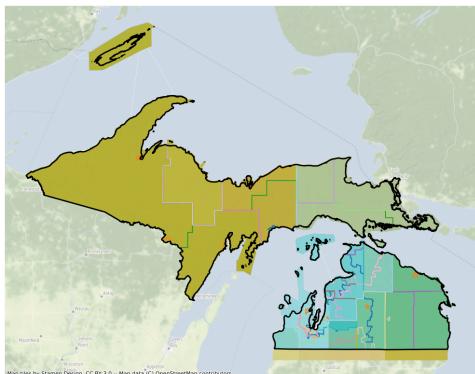
**Figure 9.** Tri-Cities Communities of Interest



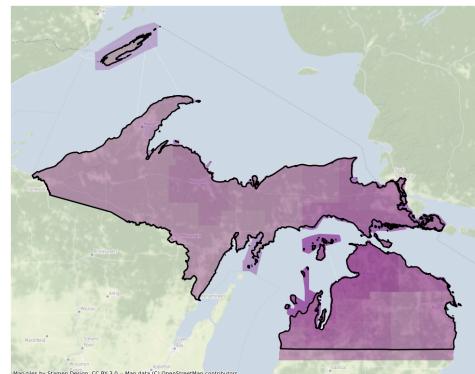
Week 14 COIs (1 area)



Week 14 COI Heatmap



Cumulative COIs (42 areas)



Cumulative COI Heatmap

**Figure 10.** Northern Michigan Communities of Interest