



EXPLORING THE POTENTIAL EFFECTS OF *EVENWEL V. ABBOTT*

A case before the United States Supreme Court could have implications for how district lines are drawn for the election of representatives to government offices in Michigan and across the nation. The underlying question at hand in *Evenwel v. Abbott* is whether the “one person, one vote” principle outlined in *Reynolds v. Sims* and the equal protection provisions set forth by the Fourteenth Amendment to the United States Constitution have been interpreted for purposes of

drawing legislative boundaries as defining “people” as those counted in the decennial census. Those suing for change argue that because the issue is representation in the policymaking bodies of our governments, redistricting should be based solely on the population of those eligible to vote, which would serve as a surrogate for the population eligible to serve in those policymaking bodies.

Redistricting

Redistricting is the process by which a state is divided into geographic districts from which are chosen United States congressional representatives, state senators and state representatives. Section 2 of Article I of the United States Constitution requires that representation in Congress be apportioned among the several states in accordance with their respective populations. At present, Michigan has 14 congressional representatives. Sections 2 and 3, respectively, of Article IV of the 1963 Michigan

Constitution require that the state Senate consist of 38 members and the state House of Representatives consist of 110 members.

The U.S. Supreme Court has held that the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution requires states to conduct apportionment and redistricting after each federal decennial census so that representation will reflect changes in population.¹

Legal and Constitutional Background of Issue

Evenwel v. Abbott 135 S.Ct. 2349 (2015) concerns the meaning or nature of the “one person, one vote” principle established in the *Reynolds v. Sims* 377 U.S. 533 (1964) case that determined the guidelines for drawing district lines for the election of representatives to legislative offices. The primary issue being considered is whether the principles outlined in *Reynolds v. Sims* and the Fourteenth Amendment to the U.S. Constitution require states to redistrict using total population, total persons eligible to vote, or provides no requirement.

to be counted – citizens and non-citizens, children, prisoners, and immigrants, both legal and illegal. Citizens of voting age population (CVAP), which counts only citizens of the United States that are of voting age (at least 18 years old) and not those incarcerated or otherwise disqualified, is a different definition of “people” that would satisfy the need for a narrow measure of those eligible to serve on our governmental policymaking bodies. While the 2010 census counted 9.9 million people in Michigan, the Michigan Department of State estimated the CVAP to be 7.7 million people in 2014.

The current measure used for redistricting in Michigan and elsewhere is the total population enumerated by the decennial census that includes everyone willing

¹ 2 USC § 2a “Reapportionment Act of 1929”



Reynolds v. Sims. *Reynolds v. Sims* is a 1964 Supreme Court case that originated in Birmingham, Alabama. It started as a challenge to the redistricting provisions of the Alabama Constitution, which provided that each county receives one senator. At that time, the largest county in Alabama had a population about 41 times larger than the population of the smallest county.

The Supreme Court described the nature of the problem posed by such population variances, in a passage that is quoted at length, as follows:

Legislators represent people, not trees or acres. Legislators are elected by voters, not farms or cities or economic interests. As long as ours is a representative form of government and legislators are those instruments of government elected directly by and directly representative of the people, the right to elect legislators in a free and unimpaired fashion is a bedrock of our political system.

The majority opinion, which created the principle of “one person, one vote,” caused many states to modify their system of legislative representation. States are required to provide substantially equal legislative representation for all citizens in a state regardless of where they reside. This principle is being challenged in the *Evenwel* case.

The opinion in *Reynolds v. Sims* appeared to make reference to both total population and total voters,² providing the legal basis for bringing this case. The Fourteenth Amendment requires that states provide equal protection of their laws to any person in their jurisdiction. The legal question in the *Evenwel* case thus puts the constitutional value of the “one person, one vote” principle against the constitutional value of equal protection for all persons, including non-voters. The case is expected to be decided in 2016, although the recent death of Supreme Court Justice Antonin Scalia may affect the timing of the decision.

² 377 US 565-566

Evenwel v. Abbott. The *Evenwel* case originated as a dispute between two Texas residents – Titus County Republican Party chair Sue Evenwel and Montgomery County resident Edward Pfenninger – and the State of Texas. Former Texas Governor Rick Perry signed a redistricting plan into law in 2014 that put roughly even numbers of Texans into each Congressional, state house, and state senate district. However, the redistricting plan did not put the same number of eligible voters into each district, which Evenwel and Pfenninger claim causes voters in districts with greater proportions of residents who are not eligible to vote to have greater political influence because their individual votes are effectively made stronger since each individual vote in such districts represents a higher percentage of the overall voting population.

Amici briefs supplied in support of the State of Texas claim that a ruling favoring equalizing voters across districts would prevent those not eligible to vote from having equal access to petition their elected representatives, and would cause these persons to lack equal representation as persons.

This case was originally appealed to the Fifth U.S. Circuit Court, which held that “one person, one vote” allows states to use total population, and does not require states to use voter population in their legislative redistricting.

Michigan Redistricting Provisions. The redistricting provisions in the 1963 Michigan Constitution were being developed by delegates to the 1961-62 Constitutional Convention as *Reynolds v. Sims* was being argued in the U.S. Supreme Court. Ultimately, the Constitutional Convention delegates failed to anticipate the direction the U.S. Supreme Court would take in the case and included provisions incorporating more than just “persons” into the redistricting process. As such, Michigan was required to abandon the legislative apportionment commission included in the 1963 Constitution as it was based on state regions, not population of voters.

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In 1982, the Michigan Supreme Court invalidated Michigan's redistricting provisions because one requirement violated the Equal Protection Clause of the U.S. Constitution and the other provisions were non-severable from the violating section. Although the Michigan Supreme Court prescribed criteria that a special master used to draft the redistricting plan after the 1980 census, it was not until 1996, when

the state legislature passed Public Act (PA) 463, that Michigan again had guidelines for legislative redistricting. These requirements comprise provisions for a population variance of five percent above or below the ideal district size, upholding precedents related to the Voting Rights Act, preserving political boundaries, contiguity, compactness, and single-member districts.

Affirmative Decision's Effect on Michigan

A U.S. Supreme Court decision affirming the ruling of the Fifth Circuit would have little impact on Michigan. Michigan's currently uses the total population for redistricting. In developing Congressional and state House of Representative and Senate districts, a population target level is set for each district calculated by dividing the total state population by the number of total Michigan seats within each legislative body. For the Michigan House, the population target is 89,851 persons (9.9 million population divided by 110 House seats). In similar

fashion, targets for the Michigan Senate and U.S. House of Representatives are established at 260,096 and 705,974, respectively. Variances are allowed for individual districts up to five percent from the target levels. If the U.S. Supreme Court affirmed the Fifth Circuit Court's decision, it would simply affirm the logic currently used by the State of Michigan in redistricting. A decision of the Court to enable states to determine their own method of redistricting could have the same effect.

A Reversal's Potential Effect on Michigan

A reversal of the Fifth Circuit's judgement would have substantial impacts on redistricting across the United States, given the current interpretation of *Reynolds v. Sims* and the Fourteenth Amendment. The effects on Michigan would be more pronounced in the reinforcement of district partisanship than in requirements to overhaul state electoral districts, as the variances between a citizen voting age population (CVAP) districting model and the current total population of legislative and congressional districts in the state are small or marginal, with only a few districts exhibiting deviations greater than 10 percent. The impact of a potential reversal would be far more pronounced in states similar to Texas.

Effectively, an *Evenwel* reversal would require Michigan's district target populations to be recomputed based on citizen voting age population (CVAP) rather than total population. Michigan has a high percent of the citizens of voting age population registered to vote. In 2014, Michigan's CVAP was estimated at 7,660,000 persons, of which 7,446,280 persons (97.2 percent) were registered to vote.³ In contrast, the 2015 Texas CVAP was estimated at 19,110,272

persons, of which 13,988,920 persons (73.2 percent) were registered to vote.⁴ As a consequence, a change to redistricting based on CVAP in Michigan would primarily result in a reshuffling to reflect where the CVAP resides as a percent of the overall population.

Besides the goal of providing substantially equal legislative representation for all citizens regardless of where they reside, Michigan law establishes the goals of upholding precedents related to the Voting Rights Act, preserving political boundaries, contiguity, compactness, and single-member districts. Those goals would not be affected by a reversal that requires or enables the use of alternative populations for redistricting.

It is worth noting that census numbers are used for many purposes beyond redistricting. Between the federal government and the states, the census

³ Michigan Secretary of State website, www.michigan.gov/sos/0,4670,7-127-1633_8722-29616--,00.html (CRC calculation)

⁴ Texas Secretary of State website, www.sos.state.tx.us/elections/historical/70-92.shtml

population is used for allotment of funding for programs such as Medicaid. Also, the census population is used for the distribution of funding through state revenue sharing programs such as unrestricted state revenue sharing and Act 51 highway funding. These distribution methods would not be directly affected by the case before the U.S. Supreme Court.

Also, counties and some cities are divided into districts or wards for the purpose of representation on the county boards of commissioners and city councils. These bodies would not be directly affected by the court case.

Michigan House of Representative Districts⁵

Changing to a districting system based on the citizens of voting age population would require many district boundaries to be revised. Using CVAP to draw district lines would require the state's 110 House districts aim for a target of 68,542 citizens of voting age. Our analysis, contained in **Appendix A**, shows that most of the districts with the widest variance from the target encompass urban communities throughout the state. Districts representing Detroit, Southfield, Kalamazoo, Jackson, Grand Rapids, Muskegon, as well several districts in the northern Lower Peninsula have the widest variance from the target populations. These districts would not uniformly gain or lose populations if the districts were adjusted to represent CVAP.

The most substantial change would occur in the 69th district (East Lansing), in which the district target population would be exceeded by 16.5 percent, or about 11,000 voters. Four other similarly-affected districts include the 106th (Cheboygan, Presque Isle, Alpena, Alcona, and Iosco Counties) with an 11.8 percent difference, the 5th (Detroit) with a 10.5 percent difference, the 34th (Flint) with a 9.6 percent difference, and the 1st (Detroit) with a 9.1 percent difference. The 69th and 106th districts would be above the target figure and would need to contract in size under a CVAP districting plan. The 5th, 34th, and 1st districts would be below the target figure and would need to expand in size.

⁵ View map of Michigan House of Representative districts at www.michigan.gov/documents/cgi/house10statewide_371473_7.pdf.

The range of variances under a citizen voting age population method for districting is far more pronounced than the current range of variances that is based on population, with 28 of the 110 districts (25 percent) above five percent, the maximum variance allowed under the current district boundaries. Under the alternative method, the average variance would be 3.9 percent, which contrasts with a current average variance of 3.0 percent. (See **Appendix A**.)

Several state House districts would be required to expand or contract substantially to adjust to the target level of CVAP divided by total seats. Because the districts with large variance from the target are not contiguous to one another, redistricting based on the citizen voting age population would affect almost all districts. This could change the nature of these seats, depending on that region's partisan lean and composition of voters.

Michigan Senate Districts⁶

The Michigan Senate would be similarly affected by this potential change in districting method. Using CVAP to draw district lines would require the state's 38 Senate districts aim for a target of 198,410 citizens of voting age. As is the case for the state House districts, the Senate districts with widest variance from the target population under a CVAP model mostly encompass urban areas of the state. They include districts in Detroit, Macomb County, Oakland County, Ann Arbor, Lansing, and Muskegon. Similar to the House districts, the Senate districts would not uniformly gain or lose populations if the districts were adjusted to represent CVAP.

The most substantial variance from target under the CVAP allocation scheme would be the 18th District (Ann Arbor), expanding its current 4.8 percent variance from the target share of population to 10.1 percent under a CVAP model. Four other districts that would most need to change in size include the 2nd (Detroit), with a variance of 8.5 percent, the 3rd (Dearborn), with a variance of 8.3 percent, the 11th (Farmington Hills, Farmington, Southfield, and Lathrup Village), with a variance of 7.8 percent, and the 13th (Rochester, Rochester Hills, Clawson, and

⁶ View map of Michigan Senate districts at www.michigan.gov/documents/cgi/senate10statewide_371479_7.pdf.

Royal Oak), with a variance of 7.2 percent. The 18th, 11th, and 13th Senate districts would need to shrink in size, whereas the 2nd and 3rd Senate districts would need to expand in size under CVAP.

Much like the House, the Senate's average variance is currently 3.0 percent, with a maximum variance of 5.0 percent. Under CVAP, the current districts would have an average variance of 6.5 percent. However, the spread of this variance is less skewed than the House, with large jumps in per-district variance occurring in individual districts instead of systemically. (See **Appendix B.**) Ten of the 38 Senate districts (26 percent) would have variances above five percent, the maximum variance under the current district boundaries.

Similar to the House, many state Senate districts would need to expand or contract somewhat to account for a few districts with heightened variances in their voter population against the state target level.

Michigan Congressional Districts⁷

The Michigan seats in the U.S. House of Representatives may need to be redrawn as well.

Currently, the Congressional districts do not vary – the district sizes are nearly uniform. Using CVAP to draw district lines would require the state's 14 Congressional districts aim for a target of 538,541 citizens of voting age. CVAP districting would create an average variance between seats of 1.5 percent, with a maximum variance of 4.5 percent for the 1st Congressional district which covers the Upper Peninsula and the northern most part of the Lower Peninsula.

A change to CVAP districting is unlikely to change the apportionment of seats among the states. Additionally, the somewhat small variances shown for the state of Michigan's congressional seats would not provide any substantial opportunity or requirement to merge or split congressional districts. District boundaries, in some instances, would need to account for a difference of around 20,000 voters. The change is unlikely to affect the partisan balance of the state's Congressional delegation – the margins of victory in each seat exceed the total number of votes that could potentially shift with new boundaries being drawn. (See **Appendix C.**)

Conclusion

The *Evenwel* case before the U.S. Supreme Court deals with the appropriate population upon which legislative districts should be drawn. Historically, these districts have been determined on the basis of total population as enumerated in the decennial census. Those suing for change suggest that as a representative democracy, legislative districts should be determined based on the population that would otherwise engage in voting in a perfect democracy.

When compared to the current legislative district boundaries for the Michigan House and Senate, a

system based on the citizens of voting age population would cause marginal changes to the Michigan legislative districts. Only a few districts would increase in variance from the target population, however, the fact that those districts are not coterminous means that many other districts would have their boundaries changed. Analysis of Appendices A and B shows that most of the districts with the widest variance from the target encompass urban communities, but these districts would not uniformly gain or lose populations if the districts were adjusted to represent CVAP.

⁷ View map of Michigan Congressional districts at www.michigan.gov/documents/cgi/congress10statewide_371463_7.pdf.

Appendix A
Michigan House of Representative Districts

STATE HOUSE DISTRICT	2010 CENSUS POPULATION	DIFF FROM TARGET	2010 CVAP	DIFF FROM TARGET	% PT CHANGE IN TARGET VARIANCE	POP/DIST AS % MI POP	CVAP/DIST AS % MI POP	% POINT DIFFERENCE
1	87,768	-2.30%	62,294	-9.10%	6.80	0.89%	0.83%	0.06
2	87,595	-2.50%	64,027	-6.60%	4.10	0.89%	0.85%	0.04
3	87,906	-2.20%	63,943	-6.70%	4.50	0.89%	0.85%	0.04
4	88,168	-1.90%	66,021	-3.70%	1.80	0.89%	0.88%	0.02
5	87,356	-2.80%	61,356	-10.50%	7.70	0.88%	0.81%	0.07
6	89,085	-0.90%	68,287	-0.40%	-0.50	0.90%	0.91%	0.00
7	88,586	-1.40%	66,954	-2.30%	0.90	0.90%	0.89%	0.01
8	87,850	-2.20%	64,510	-5.90%	3.70	0.89%	0.86%	0.03
9	89,598	-0.30%	62,867	-8.30%	8.00	0.91%	0.83%	0.07
10	87,869	-2.20%	66,763	-2.60%	0.40	0.89%	0.89%	0.00
11	92,223	2.60%	69,301	1.10%	1.50	0.93%	0.92%	0.01
12	92,972	3.50%	69,654	1.60%	1.90	0.94%	0.92%	0.02
13	91,612	2.00%	71,322	4.10%	-2.10	0.93%	0.95%	-0.02
14	87,228	-2.90%	67,114	-2.10%	-0.80	0.88%	0.89%	-0.01
15	89,880	0.00%	63,766	-7.00%	7.00	0.91%	0.85%	0.06
16	91,556	1.90%	71,051	3.70%	-1.80	0.93%	0.94%	-0.02
17	88,062	-2.00%	66,255	-3.30%	1.30	0.89%	0.88%	0.01
18	92,236	2.70%	72,533	5.80%	-3.20	0.93%	0.96%	-0.03
19	92,330	2.80%	73,243	6.90%	-4.10	0.93%	0.97%	-0.04
20	92,769	3.20%	70,915	3.50%	-0.20	0.94%	0.94%	0.00
21	92,256	2.70%	67,398	-1.70%	4.30	0.93%	0.89%	0.04
22	86,238	-4.00%	66,543	-2.90%	-1.10	0.87%	0.88%	-0.01
23	93,261	3.80%	71,031	3.60%	0.20	0.94%	0.94%	0.00
24	86,498	-3.70%	67,899	-0.90%	-2.80	0.88%	0.90%	-0.03
25	85,781	-4.50%	67,504	-1.50%	-3.00	0.87%	0.90%	-0.03
26	86,930	-3.30%	71,320	4.10%	-7.30	0.88%	0.95%	-0.07
27	91,794	2.20%	71,168	3.80%	-1.70	0.93%	0.94%	-0.02
28	86,089	-4.20%	66,256	-3.30%	-0.90	0.87%	0.88%	-0.01
29	87,992	-2.10%	66,002	-3.70%	1.60	0.89%	0.88%	0.01
30	87,305	-2.80%	68,328	-0.30%	-2.50	0.88%	0.91%	-0.02
31	88,557	-1.40%	69,488	1.40%	-2.80	0.90%	0.92%	-0.03
32	87,609	-2.50%	65,072	-5.10%	2.60	0.89%	0.86%	0.02
33	86,511	-3.70%	62,405	-9.00%	5.20	0.88%	0.83%	0.05
34	86,516	-3.70%	61,937	-9.60%	5.90	0.88%	0.82%	0.05
35	90,361	0.60%	71,146	3.80%	-3.20	0.91%	0.94%	-0.03
36	86,298	-4.00%	65,730	-4.10%	0.10	0.87%	0.87%	0.00
37	90,112	0.30%	70,658	3.10%	-2.80	0.91%	0.94%	-0.03
38	91,476	1.80%	68,209	-0.50%	2.30	0.93%	0.90%	0.02
39	91,796	2.20%	68,537	0.00%	2.20	0.93%	0.91%	0.02
40	91,620	2.00%	70,830	3.30%	-1.40	0.93%	0.94%	-0.01
41	92,805	3.30%	71,375	4.10%	-0.80	0.94%	0.95%	-0.01
42	91,945	2.30%	69,550	1.50%	0.90	0.93%	0.92%	0.01
43	93,564	4.10%	71,141	3.80%	0.30	0.95%	0.94%	0.00
44	92,893	3.40%	70,005	2.10%	1.30	0.94%	0.93%	0.01
45	88,371	-1.60%	67,195	-2.00%	0.30	0.89%	0.89%	0.00
46	89,560	-0.30%	65,046	-5.10%	4.80	0.91%	0.86%	0.04
47	89,022	-0.90%	65,180	-4.90%	4.00	0.90%	0.86%	0.04
48	90,592	0.80%	69,264	1.10%	-0.20	0.92%	0.92%	0.00
49	86,581	-3.60%	66,041	-3.60%	0.00	0.88%	0.88%	0.00
50	90,865	1.10%	68,256	-0.40%	1.50	0.92%	0.91%	0.01
51	94,324	5.00%	71,338	4.10%	0.90	0.95%	0.95%	0.01
52	86,730	-3.50%	65,442	-4.50%	1.00	0.88%	0.87%	0.01
53	85,792	-4.50%	74,718	9.00%	-13.50	0.87%	0.99%	-0.12
54	85,855	-4.40%	65,642	-4.20%	-0.20	0.87%	0.87%	0.00
55	86,414	-3.80%	67,036	-2.20%	-1.60	0.87%	0.89%	-0.01

CRC MEMORANDUM

Appendix A (continued)

STATE HOUSE DISTRICT	2010 CENSUS POPULATION	DIFF FROM TARGET	2010 CVAP	DIFF FROM TARGET	% PT CHANGE IN TARGET VARIANCE	POP/DIST AS % MI POP	CVAP/DIST AS % MI POP	% POINT DIFFERENCE
56	86,675	-3.50%	66,061	-3.60%	0.10	0.88%	0.88%	0.00
57	94,159	4.80%	72,314	5.50%	-0.70	0.95%	0.96%	-0.01
58	91,936	2.30%	70,009	2.10%	0.20	0.93%	0.93%	0.00
59	93,735	4.30%	70,206	2.40%	1.90	0.95%	0.93%	0.02
60	93,159	3.70%	73,897	7.80%	-4.10	0.94%	0.98%	-0.04
61	93,158	3.70%	70,793	3.30%	0.40	0.94%	0.94%	0.00
62	92,474	2.90%	69,713	1.70%	1.20	0.94%	0.92%	0.01
63	92,009	2.40%	69,992	2.10%	0.30	0.93%	0.93%	0.00
64	86,288	-4.00%	64,391	-6.10%	2.10	0.87%	0.85%	0.02
65	93,828	4.40%	73,681	7.50%	-3.10	0.95%	0.98%	-0.03
66	91,935	2.30%	68,997	0.70%	1.70	0.93%	0.92%	0.02
67	93,656	4.20%	71,185	3.90%	0.40	0.95%	0.94%	0.00
68	94,139	4.80%	71,275	4.00%	0.80	0.95%	0.95%	0.01
69	93,100	3.60%	79,836	16.50%	-12.90	0.94%	1.06%	-0.12
70	87,024	-3.10%	67,186	-2.00%	-1.20	0.88%	0.89%	-0.01
71	93,624	4.20%	72,089	5.20%	-1.00	0.95%	0.96%	-0.01
72	93,393	3.90%	68,496	-0.10%	4.00	0.94%	0.91%	0.04
73	93,827	4.40%	68,017	-0.80%	5.20	0.95%	0.90%	0.05
74	91,226	1.50%	67,351	-1.70%	3.30	0.92%	0.89%	0.03
75	93,802	4.40%	67,909	-0.90%	5.30	0.95%	0.90%	0.05
76	94,238	4.90%	73,626	7.40%	-2.50	0.95%	0.98%	-0.02
77	92,442	2.90%	67,584	-1.40%	4.30	0.94%	0.90%	0.04
78	90,905	1.20%	70,604	3.00%	-1.80	0.92%	0.94%	-0.02
79	85,761	-4.60%	64,786	-5.50%	0.90	0.87%	0.86%	0.01
80	91,868	2.20%	68,272	-0.40%	2.60	0.93%	0.91%	0.02
81	85,596	-4.70%	65,798	-4.00%	-0.70	0.87%	0.87%	-0.01
82	88,319	-1.70%	66,965	-2.30%	0.60	0.89%	0.89%	0.01
83	88,414	-1.60%	67,120	-2.10%	0.50	0.89%	0.89%	0.00
84	88,847	-1.10%	68,914	0.50%	-1.70	0.90%	0.91%	-0.02
85	93,124	3.60%	70,826	3.30%	0.30	0.94%	0.94%	0.00
86	92,271	2.70%	67,929	-0.90%	3.60	0.93%	0.90%	0.03
87	94,041	4.70%	70,433	2.80%	1.90	0.95%	0.93%	0.02
88	87,130	-3.00%	65,686	-4.20%	1.10	0.88%	0.87%	0.01
89	85,375	-5.00%	63,814	-6.90%	1.90	0.86%	0.85%	0.02
90	91,296	1.60%	65,564	-4.30%	6.00	0.92%	0.87%	0.05
91	86,460	-3.80%	65,176	-4.90%	1.10	0.87%	0.86%	0.01
92	85,728	-4.60%	64,225	-6.30%	1.70	0.87%	0.85%	0.02
93	94,176	4.80%	70,994	3.60%	1.20	0.95%	0.94%	0.01
94	89,913	0.10%	70,852	3.40%	-3.30	0.91%	0.94%	-0.03
95	87,780	-2.30%	65,239	-4.80%	2.50	0.89%	0.87%	0.02
96	86,595	-3.60%	67,418	-1.60%	-2.00	0.88%	0.89%	-0.02
97	85,628	-4.70%	67,510	-1.50%	-3.20	0.87%	0.90%	-0.03
98	85,899	-4.40%	65,711	-4.10%	-0.30	0.87%	0.87%	0.00
99	89,217	-0.70%	72,141	5.30%	-6.00	0.90%	0.96%	-0.05
100	86,569	-3.70%	65,801	-4.00%	0.30	0.88%	0.87%	0.00
101	92,671	3.10%	73,797	7.70%	-4.50	0.94%	0.98%	-0.04
102	85,950	-4.30%	66,911	-2.40%	-2.00	0.87%	0.89%	-0.02
103	92,224	2.60%	73,595	7.40%	-4.70	0.93%	0.98%	-0.04
104	86,986	-3.20%	67,791	-1.10%	-2.10	0.88%	0.90%	-0.02
105	92,098	2.50%	72,498	5.80%	-3.30	0.93%	0.96%	-0.03
106	94,220	4.90%	76,635	11.80%	-6.90	0.95%	1.02%	-0.06
107	94,062	4.70%	74,414	8.60%	-3.90	0.95%	0.99%	-0.04
108	87,266	-2.90%	68,877	0.50%	-3.40	0.88%	0.91%	-0.03
109	87,465	-2.70%	71,278	4.00%	-6.60	0.88%	0.95%	-0.06
110	86,997	-3.20%	70,524	2.90%	-6.10	0.88%	0.94%	-0.06

Maps of districts available at: House - <http://1.usa.gov/1SorMBG>

Source: Michigan Secretary of State, United States Census



Appendix B Michigan Senate Districts

STATE SENATE DISTRICT	2010 CENSUS POPULATION	DIFF FROM TARGET	2010 CVAP	DIFF FROM TARGET	% PT CHANGE IN TARGET VARIANCE	POP/DIST AS % MI POP	CVAP/DIST AS % MI POP	% POINT DIFFERENCE
1	254,936	-2.00%	197,305	-0.60%	-1.40	2.58%	2.62%	-0.04
2	254,991	-2.00%	181,640	-8.50%	6.50	2.58%	2.41%	0.17
3	254,934	-2.00%	181,977	-8.30%	6.30	2.58%	2.41%	0.17
4	255,038	-1.90%	190,813	-3.80%	1.90	2.58%	2.53%	0.05
5	260,300	0.10%	196,028	-1.20%	1.30	2.63%	2.60%	0.03
6	267,785	3.00%	202,934	2.30%	0.70	2.71%	2.69%	0.02
7	272,600	4.80%	208,092	4.90%	-0.10	2.76%	2.76%	0.00
8	270,685	4.10%	210,428	6.10%	-2.00	2.74%	2.79%	-0.05
9	271,123	4.20%	208,423	5.00%	-0.80	2.74%	2.76%	-0.02
10	271,486	4.40%	208,065	4.90%	-0.50	2.75%	2.76%	-0.01
11	272,444	4.70%	213,937	7.80%	-3.10	2.76%	2.84%	-0.08
12	255,847	-1.60%	190,531	-4.00%	2.30	2.59%	2.53%	0.06
13	272,689	4.80%	212,769	7.20%	-2.40	2.76%	2.82%	-0.06
14	248,755	-4.40%	188,197	-5.10%	0.80	2.52%	2.50%	0.02
15	257,980	-0.80%	193,879	-2.30%	1.50	2.61%	2.57%	0.04
16	252,184	-3.00%	193,062	-2.70%	-0.30	2.55%	2.56%	-0.01
17	251,913	-3.10%	192,108	-3.20%	0.00	2.55%	2.55%	0.00
18	272,524	4.80%	218,426	10.10%	-5.30	2.76%	2.90%	-0.14
19	259,224	-0.30%	196,082	-1.20%	0.80	2.62%	2.60%	0.02
20	250,331	-3.80%	193,405	-2.50%	-1.20	2.53%	2.57%	-0.03
21	270,401	4.00%	205,596	3.60%	0.30	2.74%	2.73%	0.01
22	253,234	-2.60%	189,142	-4.70%	2.00	2.56%	2.51%	0.05
23	265,110	1.90%	210,463	6.10%	-4.10	2.68%	2.79%	-0.11
24	269,574	3.60%	204,850	3.20%	0.40	2.73%	2.72%	0.01
25	266,956	2.60%	204,036	2.80%	-0.20	2.70%	2.71%	-0.01
26	261,519	0.50%	193,618	-2.40%	3.00	2.65%	2.57%	0.08
27	252,670	-2.90%	188,680	-4.90%	2.00	2.56%	2.50%	0.05
28	257,950	-0.80%	189,302	-4.60%	3.80	2.61%	2.51%	0.10
29	270,819	4.10%	200,602	1.10%	3.00	2.74%	2.66%	0.08
30	263,801	1.40%	195,064	-1.70%	3.10	2.67%	2.59%	0.08
31	251,819	-3.20%	193,422	-2.50%	-0.70	2.55%	2.57%	-0.02
32	267,936	3.00%	204,803	3.20%	-0.20	2.71%	2.72%	-0.01
33	249,853	-3.90%	197,798	-0.30%	-3.60	2.53%	2.62%	-0.10
34	247,218	-5.00%	185,728	-6.40%	1.40	2.50%	2.46%	0.04
35	252,697	-2.80%	199,338	0.50%	-3.30	2.56%	2.64%	-0.09
36	247,592	-4.80%	195,791	-1.30%	-3.50	2.51%	2.60%	-0.09
37	251,625	-3.30%	198,004	-0.20%	-3.10	2.55%	2.63%	-0.08
38	255,097	-1.90%	205,234	3.40%	-5.40	2.58%	2.72%	-0.14

Maps of districts available at: Senate - <http://1.usa.gov/1PERw7V>
Source: Michigan Secretary of State, United States Census

Appendix C
Michigan U.S. Congress Districts

U.S. CONGRESS DISTRICT	2010 CENSUS POPULATION	DIFF FROM TARGET	2010 CVAP	DIFF FROM TARGET	% PT CHANGE IN TARGET VARIANCE	POP/DIST AS % MI POP	CVAP/DIST AS % MI POP	% POINT DIFFERENCE
1	705,974	0.00%	562,564	4.50%	4.50	7.14%	7.46%	-0.32
2	705,975	0.00%	527,303	-2.10%	-2.10	7.14%	6.99%	0.15
3	705,974	0.00%	524,761	-2.60%	-2.60	7.14%	6.96%	0.18
4	705,974	0.00%	549,728	2.10%	2.10	7.14%	7.29%	-0.15
5	705,975	0.00%	535,254	-0.60%	-0.60	7.14%	7.10%	0.04
6	705,974	0.00%	536,223	-0.40%	-0.40	7.14%	7.11%	0.03
7	705,974	0.00%	539,015	0.10%	0.10	7.14%	7.15%	-0.01
8	705,975	0.00%	538,295	0.00%	0.00	7.14%	7.14%	0.00
9	705,975	0.00%	555,079	3.10%	3.10	7.14%	7.36%	-0.22
10	705,974	0.00%	535,876	-0.50%	-0.50	7.14%	7.11%	0.04
11	705,974	0.00%	537,217	-0.20%	-0.20	7.14%	7.13%	0.02
12	705,974	0.00%	544,352	1.10%	1.10	7.14%	7.22%	-0.08
13	705,974	0.00%	525,825	-2.40%	-2.40	7.14%	6.97%	0.17
14	705,974	0.00%	528,080	-1.90%	-1.90	7.14%	7.00%	0.14

Source: Michigan Secretary of State, United States Census

