



September 26, 2022

NYC Redistricting Commission
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via email to PublicTestimony@redistricting.nyc.gov

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VILLAGEPRESERVATION.ORG

RE: September 22 Proposed New City Council District Boundary Lines

Dear Chair Walcott and Members of the Redistricting Commission:

I write regarding the latest proposed revisions to the Redistricting Commission's City Council map. Though these were rejected by the Commission at last week's hearing, they speak to changes being contemplated and potentially still under consideration, as the Commission continues to craft further revisions to its maps and a final proposal.

Village Preservation is the largest membership organization in Greenwich Village, the East Village, and NoHo. As such, we had two main concerns regarding the September draft maps and their proposed changes to the July maps, which we urge the Commission to consider before contemplating any further changes:

- **Increasing the level of population inequality, and therefore decreasing the equality of representation, among districts and city residents.** The maps proposed but rejected in September made some important strides forward in terms of ensuring equality of representation among all districts and all New Yorkers, but also took some unfortunate steps backwards.

The July maps gave every district in New York City less than a 1% population deviation from the citywide average, with the exception of the three districts on Staten Island. The three districts which overlap with the neighborhoods we represent — the first, second, and third — had between 0.28 and 0.41% more residents than the citywide average in the July maps — a statistically trivial amount. These three districts were overpopulated as a result of the 2013 redistricting, and grew to as much as 20-30% overpopulated (and therefore underrepresented) as compared to other districts by 2022. Thus ensuring there is as little disparity between the population of these districts and the citywide average is critically important. There can be no more crucial basis for deciding

the boundaries of such districts than an adherence to the principle of one person, one vote, which can only be achieved via population equality among districts.

The rejected September maps take a small step in the right direction of reinforcing and adhering to that principle. They expand the Staten Island districts into Brooklyn, and therefore bring their population deviation from approximately 4.3% less than the citywide average (giving residents of these districts substantially greater representation and voting power) to between 0.7 and 2.4% less. While this amount is still greater than it should be, and unfairly grants additional voting power to residents of these districts, the September proposal is at least an improvement over the July maps in this regard. If anything, that deviation should be further reduced.

However, even as the proposed September maps took a step in the right direction in evening out population levels for those three Staten Island districts as compared to the rest of the city, they took a step backward for many of the other forty-eight districts. This is especially so for the three Lower Manhattan districts which intersect with our neighborhoods, which have been so overpopulated and underrepresented for a decade.

The proposed September maps increase the population inequality of these three districts to between 1.9% and 2.5% above the citywide average, and thus as much as almost 5% more than some other districts. This would leave residents of these districts with 5% less voting power and representation than New Yorkers in some other parts of the city. This is an especially egregious move backwards, not only because these districts have been so underrepresented and overpopulated for the last decade. These districts can also be reasonably expected to grow at a faster rate than the citywide average over the next ten years, leading to even greater inequality in the years ahead, as a result of several very large development projects planned and ongoing throughout these districts (including but not limited to Hudson Yards, Penn Station, Manhattan West, the World Trade Center, and Essex Crossing).

While the law does allow up to a 5% deviation in population among districts, that does not mean that the maximum deviation is fair, advisable, or in the best interest of New Yorkers. While the Commission must balance many important issues as it contemplates district boundaries, deviating from the one-person, one-vote principle of maintaining population equality among all districts should be done only when absolutely necessary to address other urgent needs. No such needs seem to necessitate the increased population imbalance proposed in the September maps

Thus I strongly urge the Commission not to make any revisions to the July maps that would increase the population imbalance among districts, and thus increase the voting power and representation imbalance among New Yorkers and among districts, as the September maps did. The recent proposal unfortunately did this in regard to

the Lower Manhattan districts and many of those outside of Staten Island. If anything, changes to the July maps should further reduce the population imbalance between districts across the city, keeping or improving upon the adjustments made to the Staten Island districts in the September proposal while maintaining the relative equality of district populations in the July proposal as a baseline moving forward.

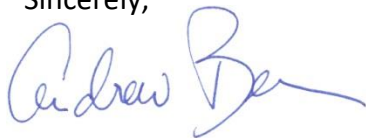
- **Further dividing the neighborhood of Greenwich Village.** The proposed July maps made some important strides in terms of uniting neighborhoods like Greenwich Village and NoHo, which had been divided among several districts under the last redistricting (Greenwich Village between districts 1, 2, and 3, and NoHo between districts 1 and 2). While no redistricting can be expected to keep all neighborhoods across all of New York City entirely within one district, the proposed July maps united all of NoHo and most of Greenwich Village into one district, the 3rd, which was a step forward in terms of fair representation for these neighborhoods.

However, the proposed September maps then split Greenwich Village nearly down the middle at Sixth Avenue, placing half of it in the third district, and the other half in the second district. There is no need to divide Greenwich Village in this way, and no greater purpose served by doing so.

In light of this, I strongly urge the Commission to maintain the eastern boundary established for Greenwich Village in the July proposed map, which was Fifth Avenue. If any changes are made regarding district boundaries in relation to Greenwich Village, it should be to unite more of Greenwich Village (which extends from Fourth Avenue to West Street) into one district, rather than further dividing it, as was proposed in the September map.

I appreciate your time and attention to these concerns. I recognize the challenging task before the Commission: to create fifty one districts that adequately protect and represent the interests of 8.8 million New Yorkers across all five boroughs. But at the end of the day, I hope you will agree that ensuring fair and equal representation among all districts, and minimizing the unnecessary splitting of long-established neighborhoods and communities, should be at the top of the Commission's priorities.

Sincerely,



Andrew Berman
Executive Director

Cc: Mayor Eric Adams
City Council Speaker Adrienne Adams

Manhattan Borough President Mark Levine
City Councilmember Christopher Marte
City Councilmember Carlina Rivera
City Councilmember Erik Bottcher