



October 10, 2022

Speaker Adrienne Adams, New York City Council
165-90 Baisley Blvd.
Jamaica, NY 11434

Councilmember Christopher Marte, 1st District
65 East Broadway
New York, NY 10002

Councilmember Carlina Rivera, 2nd District
254 East 4th Street
New York, NY 10009

Councilmember Erik Bottcher, 3rd District
224 West 30th Street, Suite 1206
New York, NY 10001

**RE: New City Council District Boundary Lines Submitted by
Redistricting Commission**

Dear Speaker Adams and Councilmembers Marte, Rivera, and Bottcher:

Village Preservation is the largest membership organization in Greenwich Village, the East Village, and NoHo. I write regarding the maps submitted by the Redistricting Commission for approval to the City Council. We believe that the approved maps unfairly and unnecessarily divide neighborhoods in our area, and leave all residents of lower Manhattan with a structural disadvantage and diluted voting power. As such, we urge you to reject these maps unless the following issues are addressed:

- **The maps increase population inequality and decrease equality of representation among districts and city residents as compared to the preliminary July maps, and perpetuate the gross inequality of the last redistricting which left Lower Manhattan residents with significantly less voting power than those in other parts of New York City.** The Commission's 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 grossly overpopulated as a result of the 2013 redistricting, and grew to as

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much as 20-30% overpopulated (and therefore underrepresented) as compared to other districts by 2022. Thus ensuring there is as little disparity as possible between the population of these districts and the citywide average and other districts 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.

However, the maps submitted by the Redistricting Commission increase the population inequality of these three districts to 2.5% above the citywide average, and as much as 5% above some other districts, leaving 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 many important issues must be balanced in contemplating 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

- **The unnecessary division of Greenwich Village at Sixth Avenue.** 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.

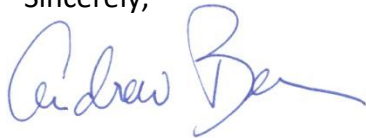
However, the revised final maps submitted by the Redistricting Commission to the City Council split Greenwich Village nearly down the middle at Sixth Avenue, placing half of it in the third district, and the other half in the second district. There is no need to divide Greenwich Village in this way, and no greater purpose served by doing so.

The Council should return the proposed eastern boundary of the 3rd Council District to Fifth Avenue north of Washington Square, as proposed in the July maps, or to move it

further east to unite even more of Greenwich Village in one district. Similarly, we urge the Council to maintain the district boundaries for Greenwich Village south of Washington Square as they were in the July maps, or as they currently are in the 1st Council District, rather than move them into the 2nd District as proposed by the Redistricting Commission. This will ensure a level of intactness and continuity for these neighborhoods which they require and deserve.

I strongly urge the Council to right the wrongs of the map submitted by the Redistricting Commission. I recognize the challenging task of creating fifty one City Council 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 top priorities for any redistricting plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Berman", with a stylized flourish at the end.

Andrew Berman
Executive Director