



MEMORANDUM

To: City of Seguin Mayor and Council
From: Andy Quittner, City Attorney *Andy Quittner*
Date: April 28, 2022
Re: Consideration of a Redistricting Plan

On December 7, 2021, in response to the 2020 census the City Council passed a pair of Resolutions setting the parameters to be used in drawing new council member district boundaries. New boundaries are required because the City's growth over the last ten years has resulted in a large population imbalance which results in the current boundaries being in violation of the "one person one vote rule". To assist the Council with drawing a new map Council appointed a six-member committee and also employed outside counsel.

In complying with federal and state law in order to draw a new council districts several factors must be considered. First, the variance between the district with the most population and the district with the least population must be less than 10% (with the perfect district, in 2022, having 3712 inhabitants). Second, any district where a minority maintains a majority of the inhabitants must be maintained. Third, any new map must insure that incumbent council members remain in their districts. Fourth, districts must be internally contiguous and as compact as possible.

The committee considered several sample maps, and working off of Plan C (included in the agenda packet) came up with two maps to present to Council, labelled Plan E and Plan G. All three plans keep any deviation between districts below 10%, are internally consistent and keep the incumbent council members in their present district. The table below summarizes the **minority voting age populations** for each district:

District	Original % Hispanic	Original % African-American	Plan C % Hispanic	Plan C % African American	Plan E % Hispanic	Plan E % African American	Plan G % Hispanic	Plan G % African-American
1	66.05	6.04	66.08	5.27	65.47	5.40	75.21	7.95
2	65.68	7.51	66.14	6.61	65.55	6.76	54.47	5.27
3	40.96	7.03	32.98	6.01	34.18	6.31	42.89	8.24
4	66.68	9.38	68.60	9.28	69.26	9.16	63.62	7.97
5	61.84	7.89	61.30	7.75	59.92	7.46	56.02	6.04
6	44.03	4.92	40.32	5.26	40.42	5.26	41.06	5.94
7	43.86	5.87	40.11	5.65	40.11	5.65	42.43	4.59
8	32.88	3.40	27.60	4.37	27.53	4.25	26.90	4.23

The overall deviation of each plan is: Plan C: 6.57%, Plan E: 5.06%, Plan G: 8.81 %. All three plans meet the less than 10% rule. Districts 3 and 8 are not ideally compact (were not originally) but given the shape and growth of the City it is not generally possible to meet this ideal. Plan G is slightly less compact than Plans C and E. The major difference between the plans is in the percentage of voting age minorities in the districts, particularly of voting age Hispanics in districts 1, 2 4 and 5 which are historically over 60 percent.

Plan G was presented as a “LULAC” plan using the Mexican American Legal Defense and Education Fund as the team that drew the lines. Interestingly, in 2011 the City Council approved a plan, which was later challenged by the League of United Latin American Citizens (“LULAC”) for being deficient in as much as the percentage of Hispanic persons of voting age in District 4 had decreased below 60%. Plan G suffers from the same complaints raised last time (Districts 2 and 5 fall below 60%), plus another red flag in that it packs a larger amount of minorities in District 1 (including African-Americans).

The demographer will be present at the council meeting should Council decide to redraw any of the maps.