

In response to egregious congressional map proposals by Republican caucus members in both chambers of the Ohio legislature, I took it upon myself to create an equally egregious proposal that is very similar in many objective, measurable map-drawing criteria, such as compactness and county splitting, while also meeting all of the constitutional requirements outlined in Article XIX of the Ohio Constitution. This proposal does have a higher population variance than either of the other two aforementioned proposals, simply because the purpose of this demonstration is not in the interest of actually adopting this map but rather to illustrate the ludicrousness of the two other aforementioned proposals. Achieving zero population variance is tedious and time consuming and will not make any meaningful change to the arguments made in this document. That said, the populations of the proposed districts range from 785,528 (1,102 below the ideal population of 786,630) to 787,977 (1,347 above the ideal population of 786,630), meaning the most populous district is only 0.31% more populous than the least populous. In order to make these populations exactly equal, no additional county splits are necessary and only a maximum of 13 additional township and municipality splits (there are currently only two, one of them being Columbus, which is too populous to be contained entirely within a single district) should be necessary. A map of the proposal can be seen below in Figure 1.

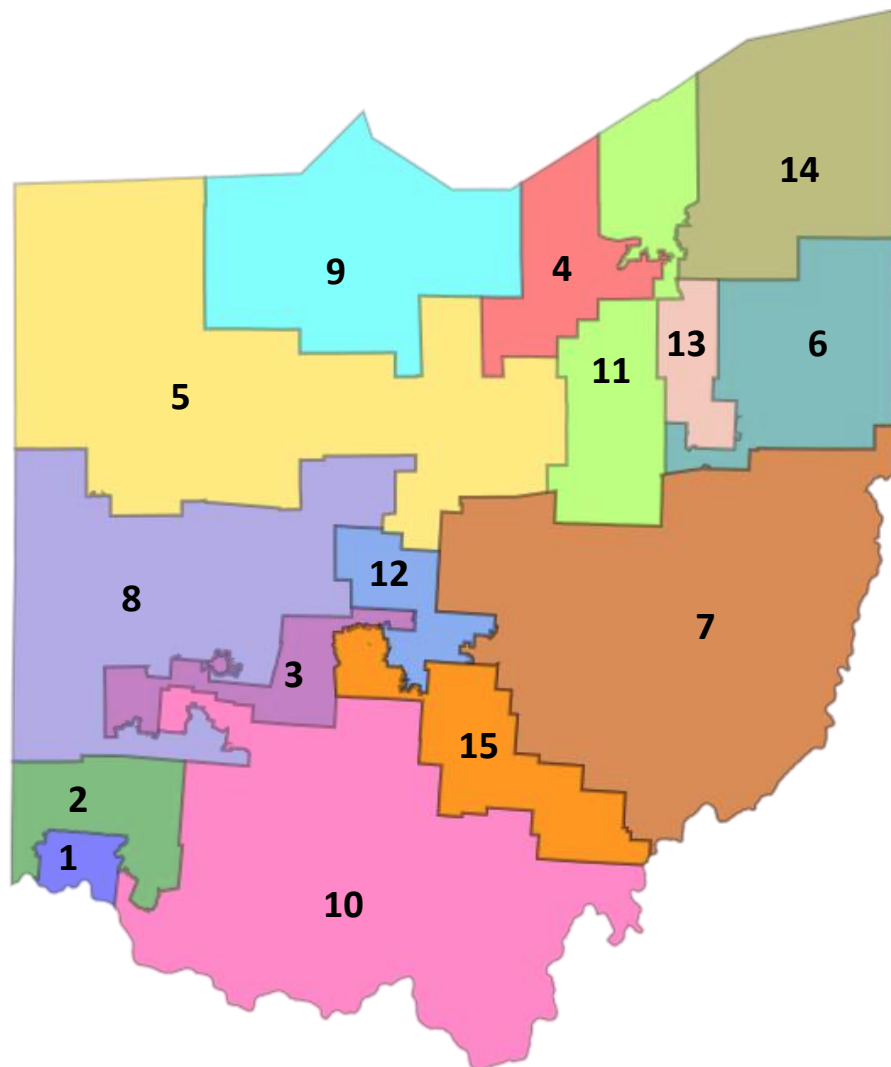


Figure 1: Map of proposed congressional districts

Table 1 below contains various measureable quantities for each of the three proposals in question: Oelslager Proposal, McColley Proposal, and this proposal, the Green proposal. Namely, it contains the number of counties split once (that is between exactly two districts), the number of counties split twice (that is between exactly three districts), the total number of county splits (that is the number of counties split once plus double the number of counties split twice), the number of pairs of districts that are both comprised of territory from portions of more than one of the same county (this is forbidden under Article XIX, Section 2(B)(7) except for counties whose populations exceed 400,000), and the compactness score from Dave’s Redistricting App (DRA) for each of the three proposals.

Table 1: Various measurable quantities for each of the three proposals

Proposal	Counties Split Once	Counties Split Twice	Total County Splits	Pairs of districts sharing >1 county	Compactness Score (0-100) according to DRA
Oelslager	8	4	16	2	45
McColley	11	3	17	1	52
Green	12	2	16	1	50

Additionally, using the same logic as both Representative Oelslager and Senator McColley, the Green proposal ensures that no political party is neither unduly favored nor unduly disfavored. The expected political breakdown of each of the three proposals can be seen in Table 2 below. This expected political breakdown was compiled using election data from the combination of the 2016 Presidential Election, 2016 U.S. Senate Election, 2018 Gubernatorial Election, 2018 Attorney General Election, 2018 U.S. Senate Election, and 2020 Presidential Election, according to DRA. For the purpose of this analysis, I used the same definition of “competitive” as Rep. Oelslager and Sen. McColley in their introduction of each of the bills they sponsored. That definition defines a competitive district as one in which there is less than a 10% difference in the historic percentage of votes received by Democrats and the historic percentage of votes received by Republicans.

Table 2: Expected partisan breakdown of districts under each of the three proposals (competitive definition 1)

Proposal	Lean Republican	Lean Democrat	Competitive
Oelslager	8	2	5
McColley	6	2	7
Green	5	4	6

Based on a glance at Table 2, one can clearly see that either party theoretically could win (or at least come very close to winning) a majority of seats, depending on which party wins each of the “competitive” seats, in each of the three proposals. However, disregarding the competitive seats for a moment, the breakdown of the remaining 8-10 seats come down to a 80%-20% split, 75%-25% split, and 56%-44% split in favor of Republicans for the Oelslager, McColley, and Green proposals, respectively. Given the approximately 55%-45% statewide vote split in favor of Republicans over the past decade, all three of these proposals award a higher percentage of safe seats to Republicans than they received votes over the last decade and a smaller percentage of safe seats to Democrats than they received votes over the last decade. That said, the Green proposal does come extremely close to matching this historic statewide split while the two other proposals come nowhere near close to that.

Looking at a *very* slightly different definition of what constitutes a competitive district shows some different results. Table 3 below depicts exactly the same information as Table 2 except it defines competitive as a district in which there is less than a 10% difference in the historic percentage of *two-party* votes received by Democrats and the historic percentage of *two-party* votes received by Republicans. Essentially, this definition removes all votes cast for candidates that were not candidates for either of the two major political parties.

Table 3: Expected partisan breakdown of districts under each of the three proposals (competitive definition 2)

Proposal	Lean Republican	Lean Democrat	Competitive
Oelslager	10	2	3
McColley	6	2	7
Green	5	4	6

Using this only *slightly* more restrictive definition of “competitive” awards even more safe seats to Republicans under the Oelslager proposal, something that I would argue shows intent to ensure more seats are rewarded to Republicans while still trying to hide behind the façade of a competitive proposal.

Reproducing Tables 2 and 3 again by employing an even stricter definition of competitive, yields Tables 4 and 5. In Table 4, “competitive” is defined as having less than a 5% difference in the historic percentage of votes received by Democrats and the historic vote percentage received by Republicans. Similarly, in Table 5, “competitive” is defined as having less than a 5% difference in the historic percentage of *two-party* votes received by Democrats and the historic percentage of *two-party* votes received by Republicans.

Table 4: Expected partisan breakdown of districts under each of the three proposals (competitive definition 3)

Proposal	Lean Republican	Lean Democrat	Competitive
Oelslager	12	2	1
McColley	10	2	3
Green	6	7	2

Table 5: Expected partisan breakdown of districts under each of the three proposals (competitive definition 4)

Proposal	Lean Republican	Lean Democrat	Competitive
Oelslager	12	2	1
McColley	10	2	3
Green	6	7	2

At this point, it is abundantly clear to see that both the Oelslager and McColley proposals award a higher percentage of safe seats to Republicans than they have received votes while the Green proposal awards a higher percentage of safe seats to Democrats than they have received votes. Because of this, *all three* of these maps unduly favor one of the two major political parties while unduly disfavoring the other. In fact, the remaining “competitive” seats favor whichever party holds an advantage in a majority of the safe seats in all three proposals, to create a likely 13-2 Republican

advantage in both the Oelslager and McColley proposals and a likely 9-6 Democrat advantage in the Green proposal.

Furthermore, all three of these proposals rip apart communities of interest. All three of these proposals trisect both of Ohio's two most populous counties, home to Ohio's two most populous cities, with districts that reach out to distant rural areas. The goals of this is quite apparent: to drown out the votes of a certain subset of the population. However, I would argue that a number of Ohio's other large cities and their surrounding areas are handled better under the Green proposal. Namely, Akron, Cincinnati, and Toledo are paired with their immediate suburbs and/or nearby cities rather than distant rural areas, as in the case of the Oelslager and McColley proposals.

I offer the following suggestion to legislative mapmakers, given the fact that it seems to be the goal of the majority caucus to ignore "competitive" districts in assessing whether a particular congressional district proposal unduly favors or disfavors a political party: regardless of the definition of "competitive" that is used, both the number of "safe" and "competitive" districts should have expected partisan splits close to the 55% Republican-45% Democrat split that has been observed in statewide elections over the last decade. Under the Oelslager and McColley proposals, the "safe" districts disproportionately favor Republicans while all of the "competitive" districts favor Republicans. Instead, the "safe" districts should closely match the 55%-45% split, as should the competitive districts. The Green proposal, neglecting its many flaws that do not relate to its expected partisan split, would be a solid proposal if, instead of having its six "competitive" districts favor Democrats 5-1, its competitive districts were evenly split or even favored Republicans 4-2.

In closing, I pose the following questions to any lawmakers that support either the Oelslager or McColley proposal:

- Do you also support the Green proposal?
- If you do not support the Green proposal, why not?

It is my opinion that anyone that can support either the Oelslager proposal or McColley proposal should have no problem with the Green proposal, as it similarly splits various communities of interest across the state and disproportionately favors one of the two major political parties, just as the Oelslager and McColley proposals do.