



The Community Integrity and Fair Representation Act

A Model State Framework for Community-Based Redistricting Integrity, Public Accountability, and Anti-Fragmentation Protections in the Post-Callais Era

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Kevin Myles | Principal Designer
The Civic Codex; Strategy & Movement Systems

Coalition Briefing on the Model State Voting Rights / Redistricting Integrity Act *(COI-centered, race-neutral-on-its-face, post-**Callais** resilient)*

Executive Summary

This briefing is written for voting-rights field experts and legal/technical practitioners who already understand the Section 2 ecosystem, racial-gerrymandering doctrine, the modern redistricting "traditional criteria" framework, and the post-**Rucho** federal posture on partisan gerrymandering. It explains-at campaign-grade detail-why we are building a **state-law** template now (attached within this document), what the template does mechanically, how it is designed to survive the current constitutional environment after **Louisiana v. Callais** (decided April 29, 2026), and how a multi-organization coalition can deploy it across multiple states without unintentionally weakening the core compliance engine.

1) The strategic diagnosis (why a state-law template, and why COI is the leverage point)

1.1 The post-**Rucho** baseline: federal courts are not the venue for partisan gerrymandering standards

Since **Rucho v. Common Cause** (decided June 27, 2019), the Supreme Court has treated partisan-gerrymandering claims as nonjusticiable in federal court-meaning the federal judiciary is not going to supply a manageable constitutional standard to police partisan entrenchment. The practical consequence is that durable constraints on partisan line-drawing increasingly come from state constitutions, state statutes, commissions, and state courts (plus political process).

1.2 What **Callais** changes in practice: it strengthens the "disentangle race from politics" attack line and raises risk for race-predominant remedies

Louisiana v. Callais (decided April 29, 2026) is not "about partisanship" in the **Rucho** sense; it is centrally an Equal Protection / racial-gerrymandering decision that (as widely summarized in legal reporting and the opinion materials) makes it harder to justify race-predominant districting when the Court concludes the asserted VRA rationale did not actually require that configuration. In the new environment, opponents have an enhanced ability to argue: "this is politics/traditional criteria, not race," and to force plaintiffs into a narrower channel when race and party are highly correlated.

1.3 The coalition's problem statement translated into a design requirement

You are seeing Southern states move quickly to redraw or defend maps by asserting "partisan gerrymandering" rationales, with the functional result of eliminating majority-Black (or Black opportunity) districts. The coalition's objective is to preserve the ability of Black communities to elect candidates of

choice without making race an operative statutory trigger (to reduce constitutional vulnerability and to avoid drafting a bill that reads like a direct workaround).

That objective implies a specific design requirement:

We need a state-law constraint that:

- 1) looks like a mainstream redistricting integrity statute (traditional principles + transparency + enforceable process),
- 2) is race-neutral on its face and does not mandate race predominance,
- 3) nevertheless blocks the most common operational tactic that reduces minority electoral opportunity under "neutral" justifications-fragmentation of cohesive communities.

1.4 Why "Community of Interest" (COI) is the right center of gravity

COI is already a recognized redistricting concept in state practice; critically, it is **structurally capable** of protecting communities that are often racially identifiable without requiring the statute to classify by race. Washington's redistricting statute is a clean example of mainstream statutory treatment: district lines should coincide with local political subdivisions and "areas recognized as communities of interest."

But COI is also the most easily manipulated criterion unless it is defined and enforced with rigor-hence the coalition's emphasis on a clear, unambiguous definition plus an anti-splitting rule that is not discretionary.

2) The theory of change (how this template protects "candidates of choice" capacity without race-explicit triggers)

2.1 The operational mechanism we are targeting

In the jurisdictions you are focused on, the most repeatable "dilution move" that can be defended as traditional/partisan is:

- Crack cohesive neighborhoods and service areas across multiple districts (COI fragmentation),
- then justify the result with "traditional principles," "incumbency stability," or "partisan fairness" narratives,
- while making it harder for communities to prove race predominance or discriminatory intent under narrowed federal channels.

This is why the template is designed as a compliance machine rather than a values statement.

2.2 What this proposed statute does (in plain technical terms)

The template forces mapdrawers to do three things that, in combination, materially raise the cost of COI fragmentation:

- 1) Define COI in administrable, government-actionable terms (not vibes; not ideology; not party).
- 2) Rank criteria so COI integrity is not relegated to an afterthought, and include a tie-break logic.
- 3) Create a presumptive rule against splitting COIs with a narrow "necessary split" definition, plus written findings and alternatives analysis for every split.

This converts "COI" from an aspirational factor into a reviewable, enforceable standard.

2.3 Why this is not a "ban partisan gerrymandering" bill (and why that matters)

Because of **Rucho**, a bill that tries to create a federal-style partisan gerrymandering standard invites confusion and attack. Instead, our template is explicit: it sets state-law criteria and procedures and is enforceable under state law, regardless of whether a plan might be defended as partisan in federal doctrine.

3) The Model Act (Safe Core): what is in it, and why each piece exists

This section is written as the coalition's shared technical understanding of the bill architecture.

3.1 Title and Findings: evergreen legitimacy, not case-reactive

Drafting posture: The findings and purpose are intentionally framed around:

- representational accountability,
- coherent constituent service,
- neighborhood/service-area integrity,
- transparency and meaningful participation,
- reduced arbitrariness through clear standards and a reviewable record.

What is deliberately excluded: any "we are doing this because the Supreme Court changed the rules" framing. That language is both politically toxic and litigation-fueling.

3.2 Definitions: COI as "government-actionable shared needs," with exclusions to prevent proxy abuse

COI definition (core):

- COI must be geographically definable, and

- must be anchored to "**substantial common interests/needs that are the subject of governmental decision-making or service delivery.**"

COI indicator categories (illustrative, non-exhaustive):

- education service patterns (attendance zones/feeder patterns),
- utilities and infrastructure service areas,
- transportation corridors and mobility barriers,
- public health service areas,
- housing/land-use patterns and displacement pressure,
- environmental burdens and disaster vulnerability,
- governance/service-delivery boundaries (special districts, planning districts),
- historic continuity and civic anchors.

COI exclusions (anti-evasion):

COI cannot be defined primarily by:

- party registration,
- partisan voting history,
- incumbency status,
- candidate residence,
- or the purpose of favoring/disfavoring a party/incumbent/candidate.

This is the "anti-COI laundering" firewall: it prevents a hostile authority from re-labeling partisan goals as "community."

3.3 Ranked criteria: traditional principles are present, COI is enforceable, and partisan inputs are sequenced

The template is "traditional-principles complete" by design:

Tier 0 (non-negotiables):

- equal population,
- compliance with federal law,
- contiguity.

Tier 1 (traditional principles):

- compactness (general standard in the current default draft),
- respect for political subdivisions (enumerated per state).

Tier 2 (community representational integrity):

- COI integrity, with anti-splitting presumption and findings.

Tier 3 (partisan/incumbent/candidate handling):

We selected the phase barrier (rather than outright prohibition) for portability and administrability: partisan/incumbent/candidate inputs cannot be used until after a baseline plan compliant with Tiers 0-2 is produced and disclosed.

This is an important expert-level nuance: we are regulating inputs and sequencing, not trying to litigate "motive" directly.

3.4 The COI anti-splitting "compliance engine"

This is the statute's functional heart:

- Presumption against splitting COIs.
- A split is allowed only if "necessary," defined narrowly:
 - required to satisfy a higher-ranked criterion, and
 - no reasonably available alternative would avoid the split while satisfying the higher-ranked criterion.
- Fewest splits practicable requirement if a split is unavoidable.
- Written findings + alternatives analysis for every COI split.

This structure is designed for record-based enforcement: it gives courts and the public something concrete to evaluate without requiring them to infer intent.

3.5 Transparency + public participation: not "input theater"

The template requires:

- a public COI submission system (including map submissions where feasible),
- a response-to-submission duty (accept/reject with reasons tied to criteria and findings),
- bounded data transparency (datasets used, shapefiles/boundary files, drafts considered, findings).

The intent is to prevent the most common sabotage pattern: "we accepted public input" while ignoring it, or "we can't show our work" because the record is thin.

3.6 Enforcement: Tier 2 as the coalition default, with remedy restraint to avoid "judicial takeover" framing

Tier 2 enforcement (current default):

- explicit private right of action,
- standing for voters in affected districts and organizations with members in affected districts,
- claims limited to criteria/process/record compliance.

Standard of review: record-based compliance review.

Remedy ladder:

- declaratory relief,
- injunction + remand for redraw,
- special master only after failure to enact a compliant plan.

This structure is designed to be enforceable while minimizing separation-of-powers backlash.

3.7 Rules of construction: the "compatibility shield" (why it is included and how it is written)

To reduce mischaracterization and constitutional risk, the template includes:

- No race-predominance mandate clause (nothing requires race to be used as a predominant factor). This is specifically responsive to the post-*Callais* environment without naming the case in findings. (supreme.justia.com)
- State-law independence / no federal cause of action clause, to avoid looking like the statute is trying to create a federal partisan-gerrymandering standard in the *Rucho* landscape. (supreme.justia.com)
- Severability drafted to preserve the criteria + COI compliance engine even if a court strikes an enforcement add-on.

4) What makes this "race-neutral" but still equity-protective (expert framing)

4.1 The statute does not require race-based districting

Nothing in the Safe Core requires the mapdrawer to sort voters by race, maintain a majority-minority district, or hit a numerical racial threshold. It regulates process and criteria that are facially neutral and widely recognized.

4.2 The statute is designed to protect communities that are legible to government and courts without racial classification

The COI definition is intentionally "government-actionable": it is about schools, infrastructure, service delivery, health access, housing conditions, transportation, and environmental burdens-things legislatures already legislate on and agencies already map.

4.3 The statute targets the operational dilution move (fragmentation), not a demographic outcome

This is the key to avoiding a "quota" characterization: the bill does not say "produce X outcome," it says "do not unnecessarily fragment cohesive communities; show your work when you do."

5) Anticipated lines of attack (and how the template is pre-hardened)

5.1 "This is a racial proxy / unconstitutional after *Callais*"

Defense: no race mandate; COI is defined by service/governance realities; exclusions prevent partisan/demographic laundering; enforcement is record-based. (supreme.justia.com)

5.2 "You can't regulate partisanship; *Rucho*"

Defense: the Act does not claim a federal partisan standard; it creates state-law criteria and process.

Rucho actually strengthens the argument that the remedy lane is state law. (supreme.justia.com)

5.3 "COI is vague"

Defense: geographic definability + objective indicator categories + exclusions + sequencing (COIs identified before adoption) + findings + alternatives analysis.

5.4 "Judicial takeover"

Defense: remedy ladder; remand first; special master only after failure; standard of review focuses on compliance with criteria and adequacy of findings, not partisan fairness.

5.5 "Administrative burden"

Defense: bounded transparency (datasets used, shapefiles, drafts, findings); "show your work" requirements mirror ordinary administrative-law record logic rather than exotic burdens.

6) Multi-state deployment: how the coalition avoids fragmentation and maintains a single "gold" template

6.1 Product bundle that must travel together

To prevent weakening by well-meaning adaptation, the coalition should treat the following as inseparable:

- 1) Model Act text (legislature-default)
- 2) Commission/hybrid patch set (for commission/hybrid states)
- 3) Section-by-section commentary memo (explains intent + anti-evasion logic)
- 4) Customization worksheets (base + commission addendum)
- 5) Minimum conforming edits rule (non-negotiables)
- 6) COI evidence menu + submission guide (so communities can operationalize COI without race language)

6.2 Governance: version control and edit authority

A small "template stewardship table" should control:

- version numbers (v0.9, v1.0, etc.),
- what changes are permitted,
- and the "non-negotiables" that cannot be traded away in state negotiations.

State pods can customize only at bracket points and state-constitution conformity points-documenting any forced deviations.

6.3 Quality gates (expert-level)

Before any state draft is "coalition-cleared," it should pass:

- 1) Constitutional fit gate (does not conflict with state constitutional redistricting provisions or required forum)
- 2) COI engine gate (definition+exclusions; anti-splitting presumption; necessary split; fewest splits; findings+alternatives; response-to-submission; record-review + remedy ladder; construction clauses)
- 3) Administrability gate (record can realistically be produced; transparency is bounded)

7) Where the drafting stands right now (what exists, what's next)

At this point in the route, the coalition has:

- a full Safe Core "clean prose" statute (state legislative districts; phase barrier; Tier 2 enforcement; compactness general standard; legislature-default authority; no "cores of prior districts"),
- a commission/hybrid patch set,
- a commentary outline that is evergreen and not case-coded,
- base + commission/hybrid customization worksheets, and
- a minimum conforming edits rule.

Model [STATE] Voting Rights and Redistricting Integrity Act (Draft v1.0)

SECTION 1. Short Title.

This Act may be cited as the "[STATE] Voting Rights and Redistricting Integrity Act."

TITLE I. GENERAL PROVISIONS

SECTION 2. Purpose.

The purposes of this Act are to establish clear and enforceable redistricting criteria and procedures that:

1. Promote fair and effective representation and accountability;
2. Preserve the integrity of neighborhoods and communities with shared public needs and service realities;
3. Increase transparency and meaningful public participation in redistricting; and
4. Provide state-law remedies for violations of these criteria and procedures.

SECTION 3. Legislative Findings.

The Legislature finds that:

1. Redistricting must follow neutral, traditional districting principles and transparent processes to maintain public confidence;
2. Unnecessary fragmentation of cohesive neighborhoods and service areas undermines effective constituent representation and accountability; and
3. Clear standards and a reviewable record promote consistent decision-making and reduce arbitrary or post hoc rationalizations.

TITLE II. DEFINITIONS

SECTION 4. Definitions.

For purposes of this Act:

1. "**Redistricting Authority**" means the **State Legislature**, including any committee, officer, staff, or designee authorized under state law to prepare, consider, or adopt state legislative district plans.

(Optional bracket for commission/hybrid states): In a state where redistricting authority is assigned to a commission, board, or hybrid structure, "Redistricting Authority" means the [Commission/Board/Hybrid Entity] established under [state constitution/statute], and any staff, consultants, or designees authorized by law to prepare, evaluate, certify, or adopt plans.

2. **"State Legislative District Plan"** means any plan establishing boundaries for districts of the [State Senate] and [State House of Representatives] (or equivalent chambers).

3. **"Community of Interest" or "COI"** means a **geographically definable** population that shares **substantial common interests or needs that are the subject of governmental decision-making or service delivery**, such that inclusion of the population within a single district would promote fair and effective representation.

4. **"COI Indicators"** means objective evidence that may be used to identify and describe a COI, including (as applicable): education service patterns (including school attendance zones or feeder patterns); infrastructure and utility service areas; transportation corridors or mobility barriers; public health service areas; housing and land-use patterns; environmental burdens or disaster vulnerability areas; governance or service-delivery boundaries (including special districts or planning districts); and historic neighborhood continuity or civic anchors.

5. **"COI Exclusions"** means that a COI shall not be defined primarily by party registration, partisan voting history, incumbency status, candidate residence, political ideology, or the purpose of favoring or disfavoring a political party, incumbent, or candidate.

6. **"COI Split" or "Split"** means dividing the geographic area of a COI among two or more districts.

7. **"Necessary"** means, with respect to a COI Split, that the Redistricting Authority demonstrates in written findings that:

(A) the split is required to satisfy a higher-ranked criterion under this Act; and

(B) **no reasonably available alternative** would avoid the split while still satisfying the higher-ranked criterion.

8. **"Fewest Splits Practicable"** means dividing a COI among the minimum number of districts to the extent practicable while complying with higher-ranked criteria.

9. **"Public Submission"** means testimony, maps, data, or written materials submitted by members of the public regarding COIs or proposed district plans.

TITLE III. RANKED REDISTRICTING CRITERIA

SECTION 5. Mandatory Ranked Criteria for State Legislative Districts.

In adopting a State Legislative District Plan, the Redistricting Authority shall apply the following criteria in ranked order:

(a) Tier 0 - Non-negotiable requirements.

1. **Equal population** as required by the United States Constitution and applicable law;
2. **Compliance with federal law**, including the United States Constitution;
3. **Contiguity**.

(b) Tier 1 - Traditional districting principles.

4. **Compactness.** Districts shall be reasonably compact, considering the district as a whole and the practical realities of geography and political boundaries.
5. **Respect for political subdivisions.** District boundaries shall, where practicable and consistent with higher-ranked criteria, respect the boundaries of counties, municipalities, and other political subdivisions recognized under state law.

(c) Tier 2 - Community representational integrity.

6. **Communities of Interest integrity.** COIs shall not be split except as permitted by this Act, and any split must satisfy the requirements of Sections 8-10.

(d) Tier 3 - Phase barrier on partisan/incumbent/candidate inputs.

The Redistricting Authority shall not use partisan voting history, party registration, incumbency status, or candidate residence **until after** it has produced and publicly disclosed a baseline plan that complies with Tiers 0-2 and the written findings requirements of this Act.

> Note for internal counsel: COI as a criterion is mainstream in state redistricting statutes; Washington's redistricting act, for example, references "areas recognized as communities of interest." (app.leg.wa.gov)

SECTION 6. Tie-Break Rule (Conflicts Within a Tier).

If two criteria within the same Tier conflict, the Redistricting Authority shall select the option that **minimizes COI Splits**, unless written findings demonstrate that doing so would materially undermine a higher-ranked criterion.

TITLE IV. COI IDENTIFICATION, ANTI-SPLITTING PRESUMPTION, AND FINDINGS

SECTION 7. COI Identification and Record (Sequencing Requirement).

(a) The Redistricting Authority shall establish a process for identifying COIs and shall place COI determinations and supporting evidence in the public record **before final adoption** of any State Legislative District Plan.

(b) COIs may be identified through Public Submissions, governmental service and planning boundaries, and other objective indicators consistent with Section 4 and Appendix A.

SECTION 8. Presumption Against Splitting Communities of Interest; Fewest Splits Practicable.

(a) A State Legislative District Plan that splits a COI is presumed noncompliant unless the Redistricting Authority satisfies the written findings and alternatives analysis requirements of Section 10.

(b) If a COI Split is Necessary, the COI shall be divided into the Fewest Splits Practicable.

SECTION 9. Minimum-Splits Requirement.

Where a COI Split is Necessary, the Redistricting Authority shall minimize the number of districts into which the COI is divided and shall not divide the COI into more districts than is required to satisfy higher-ranked criteria.

SECTION 10. Written Findings and Alternatives Analysis for COI Splits.

For each COI Split, the Redistricting Authority shall adopt written findings that:

1. Identify the COI and the objective evidence supporting it (including reference to Appendix A categories where applicable);
2. Specify the higher-ranked criterion that necessitates the split;
3. Explain why **no reasonably available alternative** would avoid the split while satisfying the higher-ranked criterion; and
4. Demonstrate that the plan achieves the Fewest Splits Practicable and complies with Section 9.

TITLE V. TRANSPARENCY AND PUBLIC PARTICIPATION

SECTION 11. Public COI Submission System.

The Redistricting Authority shall provide a public process for submitting COI information, including the ability to submit written testimony, maps (including GIS-compatible formats where feasible), and supporting documentation tied to COI Indicators and Appendix A.

SECTION 12. Response-to-Submission Duty.

For each materially supported Public Submission identifying a COI, the Redistricting Authority shall state in the public record whether the submission was accepted and reflected in the plan. If rejected or split, the Redistricting Authority shall provide reasons tied to the ranked criteria and the written findings required by Section 10.

SECTION 13. Data and Map Transparency.

The Redistricting Authority shall make publicly available, in a usable format:

1. The datasets used to draw plans;
2. Boundary files (including shapefiles or equivalent) for proposed and adopted plans;
3. Draft plans considered; and
4. The written findings required by this Act.

TITLE VI. ENFORCEMENT

SECTION 14. Private Right of Action; Standing.

(a) **Cause of action.** Any eligible plaintiff may bring an action in **[state court of competent jurisdiction]** to enforce this Act and to seek declaratory and injunctive relief.

(b) **Standing.** The following have standing:

1. Any voter residing in an affected state legislative district; and
2. Any organization with members residing in an affected state legislative district.

(c) **Actionable violations.** A claim may be brought for failure to comply with ranked criteria, COI anti-splitting requirements, written findings and alternatives analysis requirements, or transparency and public participation duties.

SECTION 15. Standard of Review (Record-Based).

A court shall determine whether the Redistricting Authority complied with this Act based on the record, including whether the ranked criteria were applied in good-faith compliance and whether written findings adequately support any COI Splits.

SECTION 16. Remedies (Remedy Ladder).

If a court finds a violation, it may:

1. Declare the plan unlawful;
2. Enjoin use of the plan and remand to the Redistricting Authority to adopt a compliant plan consistent with this Act; and
3. Appoint a special master only if the Redistricting Authority fails to adopt a compliant plan after being ordered to do so.

TITLE VII. RULES OF CONSTRUCTION; SEVERABILITY; EFFECTIVE DATE

SECTION 17. Rules of Construction.

- (a) **No race-predominance mandate.** Nothing in this Act shall be construed to require race to be used as a predominant factor in drawing districts. (supremecourt.gov)
- (b) **State-law independence.** This Act establishes mandatory criteria and procedures under state law.
- (c) **No federal cause of action.** Nothing in this Act creates a cause of action under federal law.

SECTION 18. Severability.

If any provision of this Act or its application is held invalid, the invalidity does not affect other provisions or applications that can be given effect without the invalid provision or application.

SECTION 19. Effective Date.

This Act takes effect on [_____].

APPENDIX A. COMMUNITY OF INTEREST (COI) EVIDENCE MENU; SUFFICIENT SHOWING; EXCLUSIONS

A-1. Purpose.

This Appendix provides a standardized framework for identifying and documenting COIs consistent with this Act to make COI determinations administrable and reviewable, support meaningful public participation, and reduce arbitrary or post hoc COI characterizations by requiring objective, government-actionable indicators.

A-2. Core rule.

A COI submission should describe a geographically definable area and provide objective evidence that the residents share substantial common needs or interests that are the subject of governmental decision-making or service delivery.

A-3. COI indicator categories (non-exhaustive).

A COI may be supported by one or more of the following categories:

- 1) Education & youth-serving systems (attendance zones; feeder patterns; school transportation patterns)

- 2) Infrastructure & utilities / service delivery (water/sewer; utility districts; broadband gaps; public works zones)
- 3) Transportation & mobility (transit corridors; commuting corridors; mobility barriers such as highways/rivers/rail)
- 4) Public health & human services (public health districts; health service areas; EMS/fire service areas)
- 5) Housing, land use, and neighborhood stability (planning areas; displacement pressure areas; housing authority service geographies)
- 6) Environmental conditions & disaster vulnerability (floodplains; storm surge; industrial exposure areas; evacuation zones)
- 7) Governance boundaries & civic administration (special districts; planning districts; municipal service zones)
- 8) Historic continuity & civic anchors (recognized neighborhood boundaries; civic institutions; shared public facilities)

A-4. Evidence types.

Evidence may include government maps and plans, agency reports, service-area descriptions, community-generated maps with clear boundary descriptions, and written testimony describing shared needs tied to the indicator categories.

A-5. Sufficient showing standard.

A COI submission is presumed materially supported when it includes:

- 1) **Geographic definability** (boundary description or map/GIS file); and
- 2) **Objective support** either:
 - evidence from **at least two (2)** indicator categories, or
 - evidence from one (1) indicator category plus documentation that the category is a dominant service/governance boundary for the area; and
- 3) **Narrative link to government action** explaining how the shared needs are addressed by governmental decision-making or service delivery.

A-6. Exclusions and anti-evasion guardrails.

A COI submission must not define the COI primarily by party registration, partisan voting history, incumbency status, candidate residence, or political ideology. The Redistricting Authority shall not invent ad hoc COIs to justify splitting materially supported COIs without making findings consistent with Section 10.

A-7. Treatment of materially supported COIs.

For each COI meeting the sufficient showing standard, the Redistricting Authority must place the COI and supporting evidence in the public record and comply with the response-to-submission and COI split findings requirements if the COI is not kept whole.

APPENDIX B. MODEL COI SUBMISSION FORM + MAPPING GUIDANCE

B-1. Model COI Submission Form (Record-Ready)

Submission Information

- COI Name:
- Primary contact (optional):
- Organization (if any):
- Date submitted:

COI Boundary (required)

- Narrative boundary description (streets/landmarks):
- Optional reference geography (tracts/block groups/precincts as reference only):
- Map attachment (PDF/image): yes/no
- GIS file (GeoJSON/shapefile/other): yes/no

COI Type / Evidence Categories (check all that apply; attach evidence)

- Education / school patterns
- Infrastructure / utilities / service delivery
- Transportation / mobility barriers
- Public health / human services
- Housing / land use / neighborhood stability
- Environmental burdens / disaster vulnerability
- Governance / service-delivery boundaries
- Historic continuity / civic anchors

Shared Needs Statement (recommended 150-300 words)

- Describe shared needs and how they are addressed by governmental decision-making or service delivery:

COI Integrity Request

- Keep COI within one district where practicable; or

- If split is Necessary, split into Fewest Splits Practicable and explain why.

Affirmations

- This submission is based on shared public needs/service realities and a geographically definable area.
- This submission is not based on party registration, partisan voting history, incumbency, candidate residence, or ideology as defining features of the COI.

B-2. Mapping Guidance (nontechnical)

- 1) Use recognizable edges (major roads, rivers, rail, school zone edges, utility service edges).
- 2) Keep the area contiguous if possible.
- 3) Prefer boundaries that match service delivery or planning geographies when available.
- 4) Avoid defining the COI by voting behavior, party preference, or ideology.