



October 28, 2021

Sent via email

Limestone County Commission
Collin Daly, Chair
310 W. Washington Street
Athens, AL 35611
collin.daly@limestonecounty-al.gov

Dear Chair Daly and Members of the Limestone County Commission:

The NAACP Legal Defense and Educational Fund, Inc. (“LDF”), the Alabama State Conference of the NAACP, and the Limestone County Branch of the NAACP write to provide additional information in support of our letter of Tuesday, October 26, 2021. Specifically, attached to this letter as Appendix A is a redistricting plan for the County Commission, including relevant demographic information, which illustrates that preserving Black voting strength in District 3 is readily accomplished with minimal changes to the map proposed by the County Commission. As non-profit, non-partisan civil rights organizations, our goal in proposing this alternative map is to ensure that all voters in Limestone County have equal access to the political process, and that Black voting power is not wrongfully diluted.

As we noted in our previous letter, Limestone County’s Black population has grown twice as fast as its white population since 2010.¹ Yet the Commission’s proposed redistricting plan reduces the Black population in District 3—where Black voters’ preferred candidates have been increasingly competitive—from 20% to 17%.² To do this, the Commission’s plan removes 26% of District 3’s Black population, while removing only 12% of the district’s white population.³ In other words, under the Commission’s proposal, a Black person living in District 3 is more than twice as likely as a white person to be drawn out of the district.

¹ U.S. Census Bureau, *Alabama: 2020 Census* (Aug. 25, 2021), <https://www.census.gov/library/stories/state-by-state/alabama-population-change-between-census-decade.html> (reporting growth of 35.9% among Limestone County residents identifying as “Black or African American alone or in combination,” as compared to growth of only 15.9% among Limestone County residents identifying as “White alone”).

² See Limestone Cty., Ala., *Redistricting Proposal*, at 2, <https://limestonecounty-al.gov/wp-content/uploads/2021/10/Redistricting-Proposal.pdf> (last visited Oct. 27, 2021).

³ Under the Limestone County Commission’s proposed redistricting plan, District 3 would lose 1,544 of its 6,048 Black residents, a reduction of 25.53%. At the same time, District 3 would lose 2,339 of its 19,564 non-Hispanic white residents, a reduction of only 11.96%. *Id.*

With these changes, the Commission’s proposal appears likely to diminish the opportunity for Black voters and other voters of color to meaningfully participate in the electoral process by influencing the elections of candidates of their choice. The plan also appears to have improperly used race as a predominant consideration in fashioning District 3’s borders, in that it removes a far higher proportion of Black voters than white voters, without any clear justification.

For these reasons, we ask the Commission to revisit its proposal. Our proposed redistricting plan would enable the Commission to address the issues we have identified and maintain the Black voting-age population (“BVAP”) of District 3 at 20.4%. With respect to Districts 1 and 2, our proposal is identical to the Commission’s proposal—restoring District 3’s Black population requires changes only to Districts 3 and 4. As our map illustrates, maintaining the current BVAP in District 3 is possible, reasonable, and consistent with federal requirements and other traditional redistricting principles.

We reiterate our willingness to assist the Commission in developing an inclusive redistricting plan that complies with Section 2 of the Voting Rights Act and the Constitution. We would also be happy to provide a shapefile of our proposed map for the Commission’s consideration. We look forward to your response.

Sincerely,

/s/ Steven Lance

Leah C. Aden, Deputy Director of Litigation
Stuart Naifeh, Manager of the Redistricting Project
Kathryn Sadasivan
Steven Lance
Clarence Okoh
Tonya Farrow-Chestnut
NAACP Legal Defense & Educational Fund, Inc.
40 Rector Street, 5th Fl.
New York, NY 10006

Benard Simelton, President
Alabama State Conference of the NAACP

Wilbert L. Woodruff, President
Limestone County Branch of the NAACP

cc (via email): Commissioner Daryl Sammet (District 1)
Commissioner Danny Barksdale (District 2)
Commissioner Jason Black (District 3)
Commissioner LaDon Townsend (District 4)

Appendix A

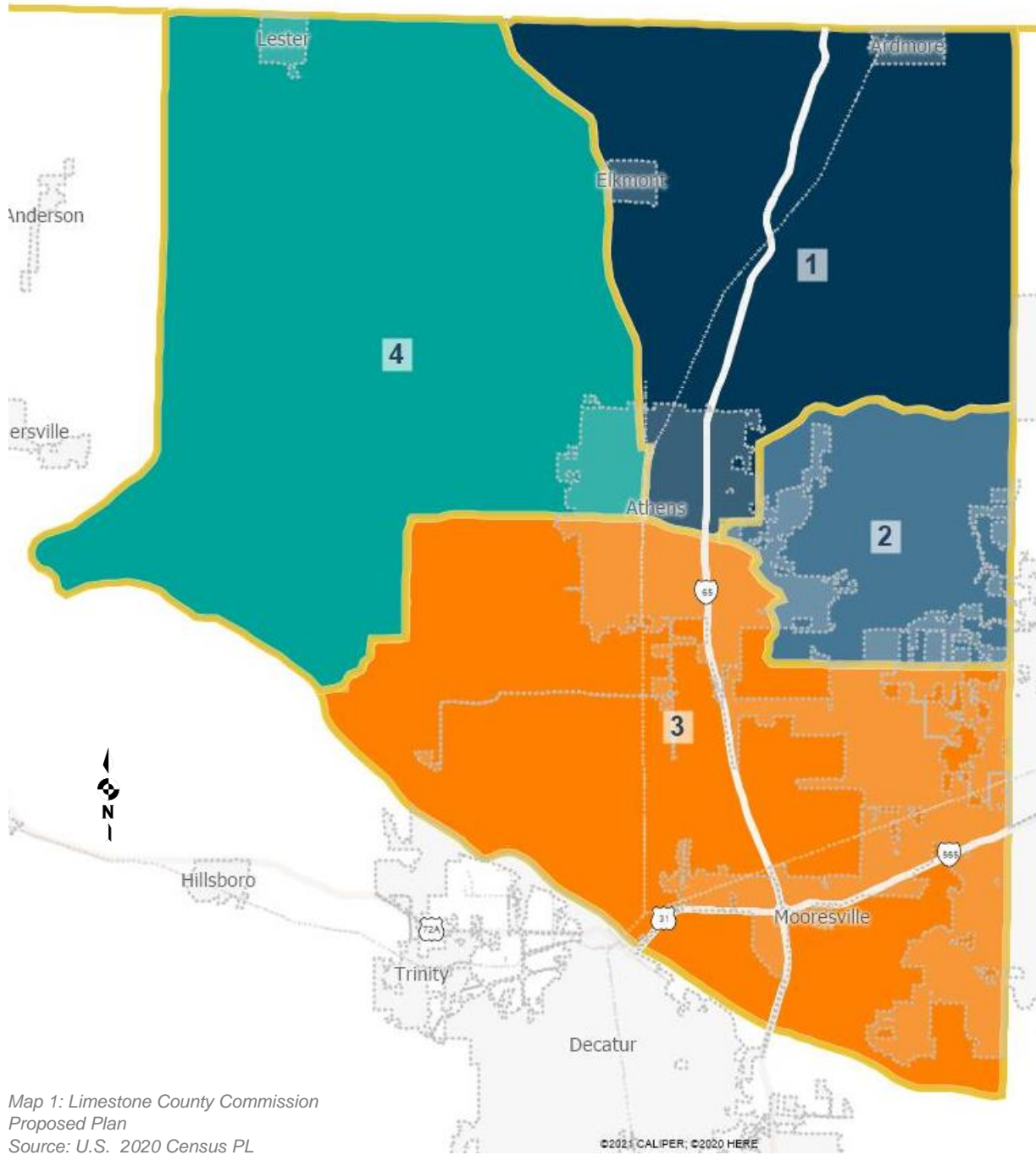


Table 1: Limestone County Commission--Proposed Plan. Source: U.S. 2020 Census PL

District	Population	Deviation	% Deviation	% HVAP	% WVAP	% BVAP
1	25,628	-265	-1.0%	4.8%	84.0%	5.6%
2	25,974	81	0.3%	3.2%	72.6%	18.6%
3	25,540	-353	-1.4%	6.6%	64.2%	20.4%
4	26,428	535	2.1%	7.1%	80.3%	8.0%