IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

BLACK VOTERS MATTER CAPACITY BUILDING INSTITUTE, INC., *et al.*,

Plaintiffs,

Case No. 2022-CA-000666

v.

CORD BYRD, in his official capacity as Florida Secretary of State, *et al.*,

Defendants.
_____/

DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Defendants, the Florida House of Representatives, the Florida Senate, and Secretary of State Cord Byrd, respectfully move the Court for summary judgment in their favor as to Counts IV and V of Plaintiffs' Complaint for Injunctive and Declaratory Relief, dated April 22, 2022.

INTRODUCTION

At the back end of their five-count complaint, which focuses on minority voting rights and alleged partisan intent, Plaintiffs claim that a small number of districts in the State's duly enacted congressional district map violate the Florida Constitution's mandate that districts be compact and, where feasible, utilize political and geographical boundaries. A simple, visual examination of the map and standard compliance metrics flatly refute these claims, however.

The challenged districts are both visually and mathematically compact, easily clearing the constitutional bar. They have no unusual fingers or tortured, bizarre appendages, and their compactness scores compare favorably to the mean compactness scores of the state legislative

districts that the Florida Supreme Court unanimously upheld earlier this year. *See In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022). The challenged districts also faithfully follow political and geographical boundaries where feasible, adhering to county boundaries, rivers, and major roadways along nearly their entire perimeters, while properly balancing other constitutional imperatives, such as numerical equality of population.

No discovery is needed to determine what the face of the districts and undisputed data make clear: that the challenged districts are compact and, where feasible, utilize political and geographical boundaries. Summary judgment as to Counts IV and V would eliminate claims that are ripe for decision and streamline this case as the parties proceed through the discovery phase. This Court should therefore enter summary judgment for Defendants as to Counts IV and V.

BACKGROUND

A. Statement of Facts.

In August 2021, the United States Census Bureau released the census data required for redistricting. Compl. ¶ 65. The data revealed that Florida's total population had increased to 21,538,187 people. U.S. CENSUS BUREAU, QUICKFACTS, FLORIDA, https://www.census.gov/quickfacts/FL. As a result, Florida was apportioned one additional congressional district, for a total of twenty-eight districts. U.S. CENSUS BUREAU, 2020 CENSUS APPORTIONMENT RESULTS, https://www.census.gov/data/tables/2020/dec/2020-apportionment-data.html.

The Florida Constitution imposes two tiers of standards on congressional redistricting. *See* Art. III, § 20, Fla. Const. "The tier-one standards take precedence over those in tier two; but the order of the standards within each tier 'shall not be read to establish any priority of one standard over the other.'" *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So.

3d 1282, 1286 (Fla. 2022) (quoting Art. III, § 21(c), Fla. Const.). The Constitution's tier-one standards prohibit intentional political favoritism, protect racial and language minorities, and require districts to consist of contiguous territory, while the "tier-two standards address . . . districts' population, shape, and boundaries." *Id*. Specifically, the tier-two standards require districts to "be as nearly equal in population as is practicable," "be compact," and, "where feasible, utilize existing political and geographical boundaries." Art. III, § 20(b), Fla. Const.

These standards are identical to the standards that article III, section 21 of the Florida Constitution imposes on state legislative districts, *League of Women Voters of Fla. v. Fla. House of Representatives*, 132 So. 3d 135, 139 nn.1–2 (Fla. 2013), with one exception: the requirement of population equality applies more rigidly to congressional than to state-legislative districts, *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d 597, 629–30 & n.29 (Fla. 2012). The equal-population standard mandates "mathematical exactness" in congressional district populations, *id*. at 629 & n.29, while tolerating greater deviations in the populations of state legislative districts, *id*. at 629–30. With twenty-eight districts and 21,538,187 people, the ideal or target population of a congressional district in Florida after the 2020 census was 769,221 people.

On April 21, 2022, the Legislature enacted a new congressional redistricting plan for the State of Florida. Compl. ¶ 78. Plaintiffs filed their complaint one day later—before the Governor had even signed the newly enacted redistricting plan into law. Plaintiffs' complaint contains five counts. The first three counts allege violations of tier-one standards that protect racial minorities and prohibit intentional political favoritism, while the fourth and fifth counts allege violations of tier-two standards. Specifically, Count IV alleges that Districts 7, 13, and 14 are not compact, and Count V alleges that Districts 4, 5, 13, and 14 do not utilize political

and geographical boundaries where feasible. Because the map and associated data make clear that these districts satisfy tier-two standards, summary judgment is warranted as to Counts IV and V.

B. Maps and Statistics.

The appendix to this motion contains maps of all twenty-eight congressional districts, including detailed images of the five districts challenged in Counts IV and V, and population data and compactness scores for all congressional districts. For comparison, the appendix also contains maps, population data, and compactness scores associated with all state legislative districts that the Legislature enacted earlier this year, and which the Florida Supreme Court upheld in *In re Senate Joint Resolution of Legislative Apportionment 100*, 334 So. 3d 1282 (Fla. 2022).

All population data and compactness scores presented in this motion and the appendix are derived from the web-based map-drawing application made available to the public by the Florida Legislature. *See* FLORIDA LEGISLATURE, FLORIDA REDISTRICTING, https://www.floridaredistricting.gov/pages/get-involved. The population data are based on the 2020 Census. Moreover, geographical features such as roads and rivers, as well as Census population data, are textbook examples of facts of which courts may take judicial notice. *See* § 90.202(12), Fla. Stat. (authorizing judicial notice of "[f]acts that are not subject to dispute because they are capable of accurate and ready determination by resort to sources whose accuracy cannot be questioned"); *Bd. of Pub. Instruction of Orange Cnty. v. Budget Comm'n of Orange Cnty.*, 167 So. 2d 305, 306 (Fla. 1964) (census data); *Garver v. E. Airlines*, 553 So. 2d 263, 268 (Fla. 1st DCA 1989) (geography); *Henderson Sign Serv. v. Dep't of Transp.*, 390 So. 2d 159, 160 (Fla. 1st DCA 1980) (roads).

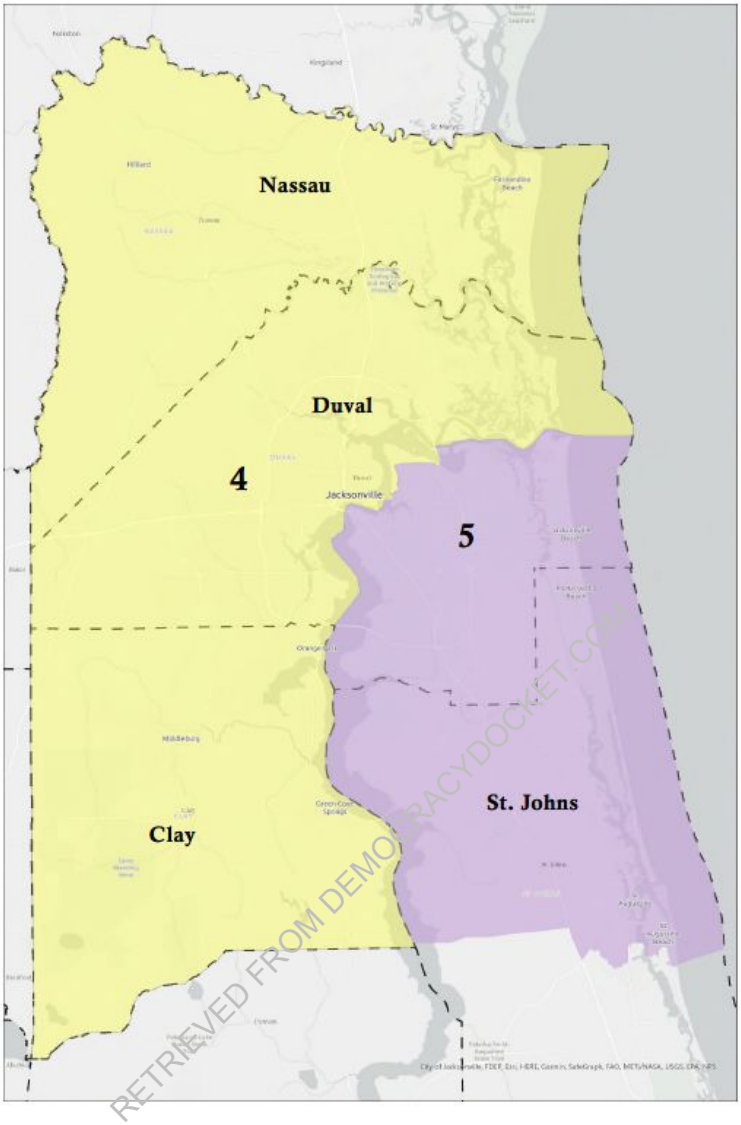
ARGUMENT

I. DISTRICTS 4, 5, 13, AND 14 UTILIZE POLITICAL AND GEOGRAPHICAL BOUNDARIES WHERE FEASIBLE.

The Florida Constitution provides that "districts shall, where feasible, utilize existing political and geographical boundaries." Art. III, § 20(b), Fla. Const. Districts 4, 5, 13, and 14 easily meet this standard.

The Florida Supreme Court has defined "political boundaries" to mean county and municipal boundaries, *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d 1282, 1288 (Fla. 2022), while "geographical boundaries" refers to geographical demarcations that are "easily ascertainable and commonly understood," including "rivers, railways, interstates, and state roads," *id*. (quoting *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d 597, 638 (Fla. 2012)). The Constitution recognizes that district boundaries cannot always utilize political and geographical boundaries, *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d at 638 ("There will be times when districts cannot be drawn to follow county lines . . . ."), and therefore requires adherence to political and geographical boundaries only "where feasible"—a phrase that introduces "flexibility" into the constitutional standard, *id*. at 636.

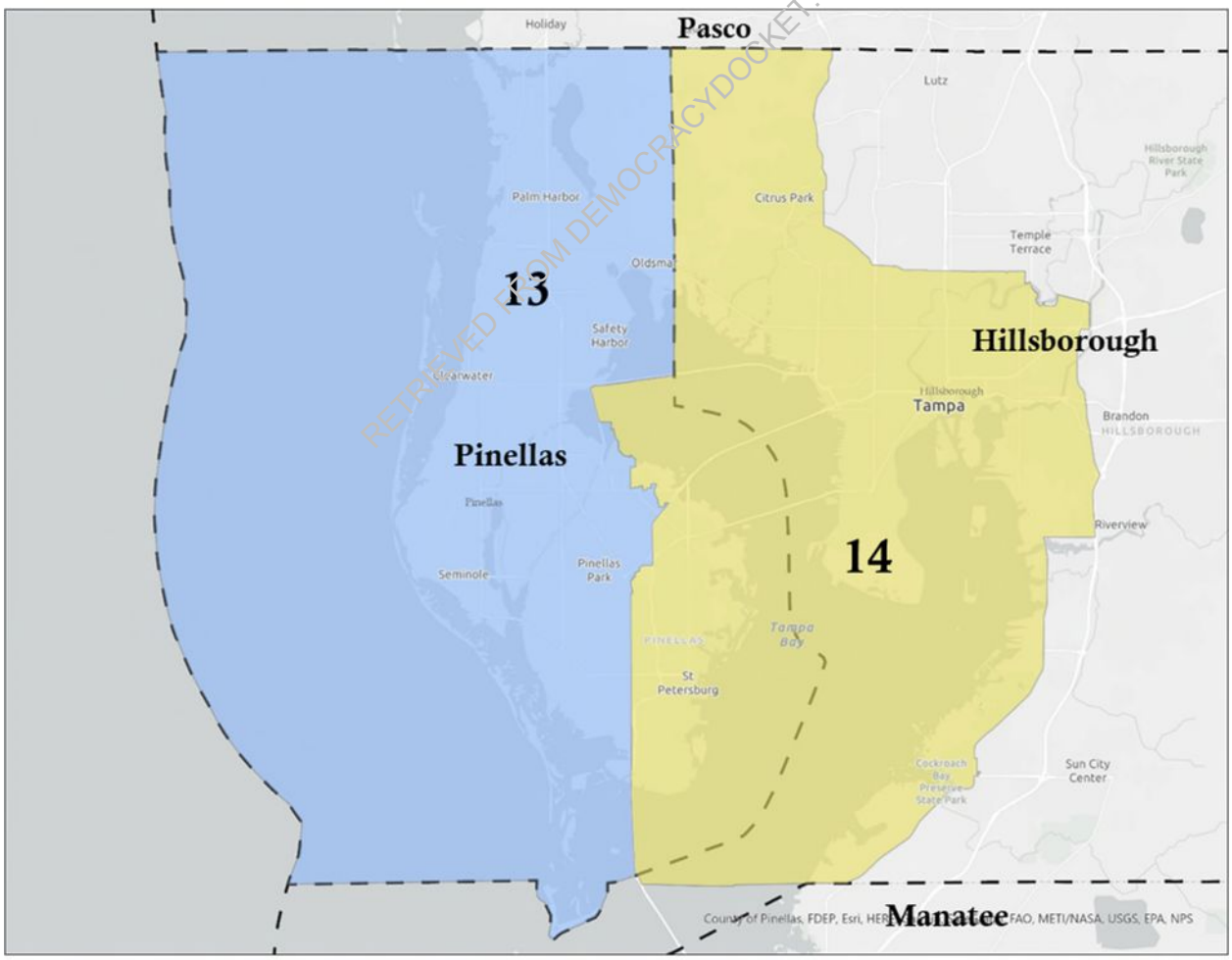
District 4 follows the St. Johns River and the boundaries of Nassau, Duval, and Clay Counties along nearly its entire perimeter. It deviates from these boundaries only to the extent necessary to satisfy the constitutional requirement that districts be equally populated. This minor deviation occurs south of the St. Johns River—across from Downtown Jacksonville—where District 4 adds the population needed to attain the ideal population of 769,221 people.



District 5 is situated between the St. Johns River and the Atlantic Ocean and therefore utilizes existing political and geographical boundaries—the St. Johns River, the boundaries of Duval and St. Johns Counties, and the Atlantic Coast—along its northern, western, and eastern boundaries. To the south, District 5 terminates in St. Johns County where it achieves the ideal district population of 769,221. Along its southern boundary, it follows political and geographical boundaries where feasible: County Road 214 through rural St. Johns County west of Interstate 95, and easily ascertainable and commonly understood boundaries in the

more densely populated areas east of Interstate 95 (such as State Road 207, U.S. Route 1, the Matanzas River, State Road A1A, and the municipal boundaries of Saint Augustine Beach).

District 13 follows the boundaries of Pinellas County along the entirety of its western, northern, and southern boundaries. It achieves the ideal district population of 769,221 people, however, before it reaches Pinellas County's eastern boundary. Still, where feasible, it follows existing political and geographical boundaries along its eastern boundary. Most of District 13's eastern boundary follows either the county boundary (to the north) or U.S. Route 19 (to the south). Where feasible, the small remainder of District 13's eastern boundary follows State Road 60 (West Courtney Campbell Causeway), the six-lane Bayside Bridge, or Interstate 275.



District 14 also follows political and geographical boundaries where feasible. It shares District 13's eastern boundary, which is described above. It follows county boundaries on its north and south: the boundary between Hillsborough and Pasco Counties on the north side of the district and the boundary between Hillsborough and Manatee Counties on the south. Along the southern half of its eastern boundary, it follows a federal highway (U.S. Route 41), while the northern part of the district's eastern boundary, which passes through populous areas in and around Tampa, consists almost entirely of geographical boundaries: State Road 589 (the Suncoast Parkway), four-lane Gunn Highway, State Road 580, U.S. Route 301, and Interstate 75.

A simple review of the maps demonstrates that Districts 4, 5, 13, and 14 are studiously attentive to political and geographical boundaries. Where feasible, they follow rivers, county boundaries, state roads, and highways, and other demarcations that are "easily ascertainable and commonly understood." *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d at 1288 (quoting *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d at 638). This Court should accordingly grant summary judgment in Defendants' favor as to Count V.

II. DISTRICTS 7, 13, AND 14 ARE COMPACT.

The Constitution also provides that "districts shall be compact." Art. III, § 20(b), Fla. Const. Districts 7, 13, and 14 are all compact; none has an unusual, bizarre, or tortured shape. Indeed, these districts are at least as compact, both visually and mathematically, as many of the state legislative districts the Florida Supreme Court unanimously upheld earlier this year.

The compactness standard concerns the "shape" of a district. *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d at 1287. Most importantly, a district "should not have an unusual shape, a bizarre design, or an unnecessary appendage." *In re Senate Joint Resol. of*

Legislative Apportionment 1176, 83 So. 3d at 634. The Constitution does not require districts to be as compact as possible—only that they be "compact." *Id*. at 635. The compactness standard ensures "that districts are logically drawn and that bizarrely shaped districts are avoided." *Id*. at 636.

The compactness inquiry can be a complicated one, calling for sensitivity to the many forces that can impact a district's shape. As the Florida Supreme Court explained, "a district's compactness can be affected by factors over which the line-drawer has no control." *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d at 1287. These include Florida's unique geography and the interplay between the equal-population mandate and the distribution of the State's population. *Id*. Similarly, the Constitution recognizes that coequal requirements such as compactness and fidelity to political and geographical boundaries can be in tension on each other and work at cross purposes, Art. III, § 20(c), Fla. Const., and it therefore leaves to the Legislature the task of "balancing the tier-two standards together in order to strike a constitutional result," *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d at 639. For example, the permissible decision to follow rivers or county or municipal boundaries—some of which are notoriously irregular—can affect a district's compactness. *Id*. at 635. Even the census blocks that serve as the building blocks for congressional districts can have unusual shapes that diminish compactness.[1] "Because the constitutional text does not set a hierarchy among the tier-two standards themselves, the Legislature retains the discretion to balance

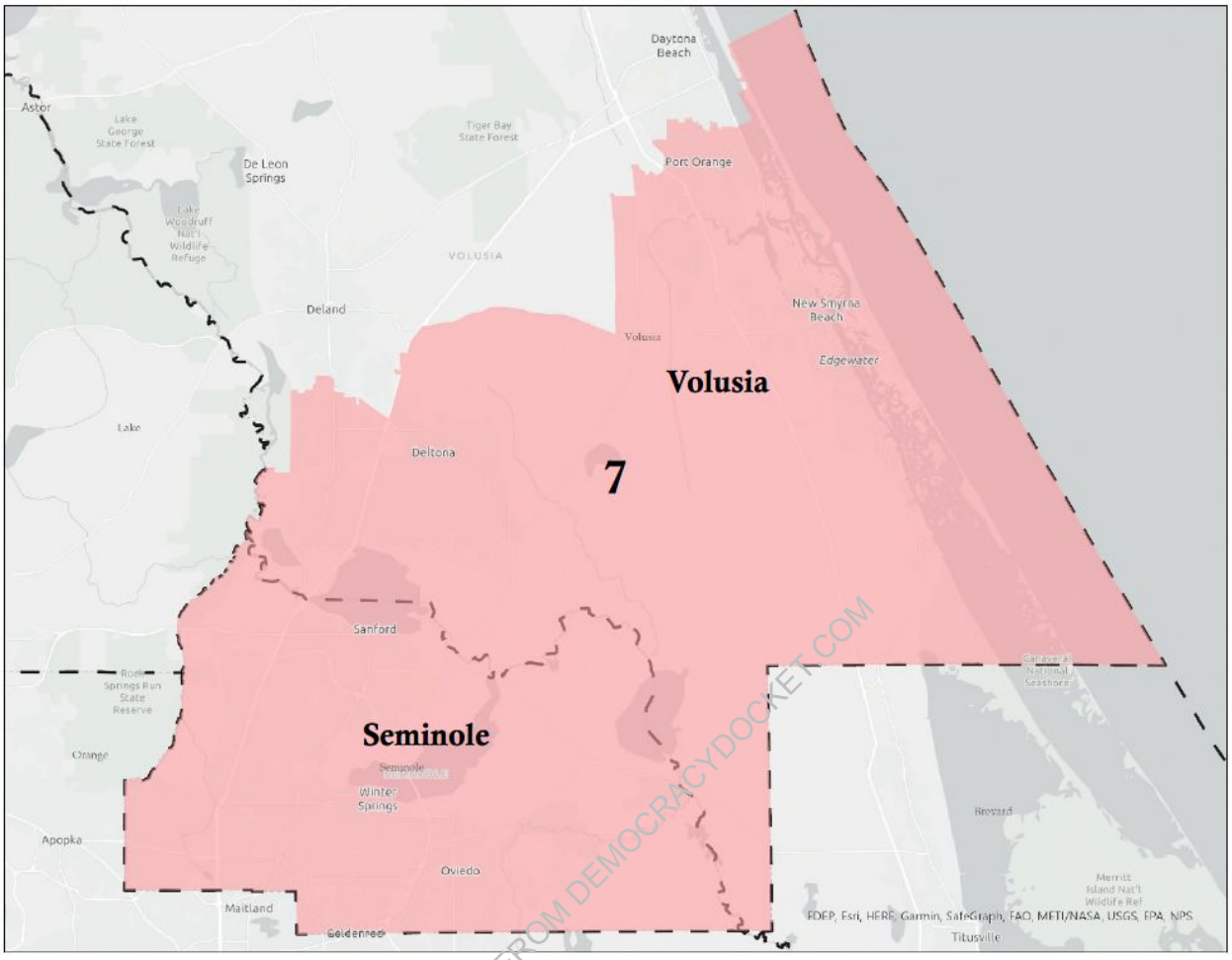
[1] The 2020 Census geography divides Florida into 390,066 blocks, 13,388 block groups (which are aggregations of blocks), and 5,160 tracts (which are aggregations of block groups). U.S. CENSUS BUREAU, 2020 TALLIES, https://www.census.gov/geographies/reference-files/time-series/geo/tallies.html; U.S. CENSUS BUREAU, GLOSSARY, https://www.census.gov/programs-surveys/geography/about/glossary.html. In redistricting, these geographical units are combined to form electoral districts.

those standards in the apportionment." *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d at 1286.

A. Visual Assessment of Compactness.

Compactness is evaluated first and foremost by a visual examination of the district, *id*. at 1287; *In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d at 634—or what is sometimes called the "eyeball" test. Here, a visual examination reveals a strong adherence to compactness.

District 7 utilizes the southern boundary of Seminole and Volusia Counties as its own southern boundary. On the east, it follows the slightly diagonal Atlantic Coast. The remainder of the district simply fills the geographical area between these two boundaries, and is therefore regular in shape, with no unusual fingers or bizarre appendages. Along the way, the district's boundary makes adjustments to keep Volusia County's municipalities whole. The boundary runs between Deland, which is outside the district, and DeBary, Orange City, Deltona, and Lake Helen, which are inside the district, and between Daytona Beach and South Daytona, which are outside the district, and Port Orange and Daytona Beach Shores, which are inside the district. The compactness requirement permits these minimal boundary adjustments. *See In re Senate Joint Resol. of Legislative Apportionment 1176*, 83 So. 3d at 638 ("In a compactness analysis, we are reviewing the general shape of a district; if a district has a small area where minor adjustments are made to follow either a municipal boundary or a river, this would not violate compactness."). Between these concentrations of municipalities, District 7's boundary mostly follows State Road 44, a geographical boundary. District 7 is therefore compact and appropriately balances tier-two considerations of compactness and adherence to political and geographical boundaries.

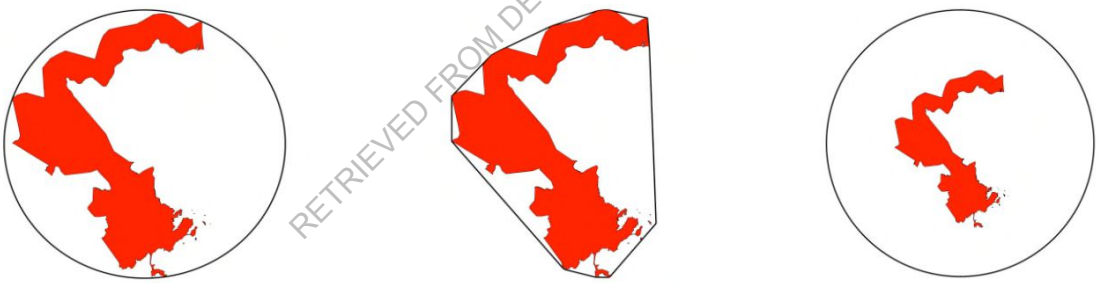


Districts 13 and 14 are also compact. District 13 has as regular, rectangular shape that covers most of Pinellas County. The district boundaries follow the county boundaries except along the southern segment of the district's eastern boundary, which is largely a vertical line. The district has no bizarre tails, extremities, or appendages. Similarly, District 14 has a regular shape. It is configured from north to south through Pinellas and Hillsborough Counties and, as explained above, faithfully adheres to political and geographical boundaries where feasible.

B. Mathematical Assessment of Compactness.

In addition to a district's visual appearance, courts consider quantitative measures of compactness. *In re Senate Joint Resol. of Legislative Apportionment 100*, 334 So. 3d at 1287. Three common compactness measures are the Reock, Convex Hull, and Polsby-Popper measures.

Id. Each generates a score between 0 and 1 that represents the ratio between the district's area and the area of some other geometric shape. *League of Women Voters of Fla. v. Detzner*, 179 So. 3d 258, 283 nn.6–8 (Fla. 2015). The closer the score approaches to 1, the more compact the district is presumed to be. The Reock score, for example, compares the district's area to the area of the smallest circle that can encompass the district. *Id*. at 283 n.6. A score of 0.45 means that the district's area covers 45 percent of the circle's area. In theory, the more nearly a shape resembles a perfect circle, the higher its Reock score will be. The Convex Hull score indicates the ratio of the district's area to the area of the smallest convex polygon that can enclose the district (imagine a taut rubber band encompassing the district), while the Polsby-Popper score compares the district's area to the area of a circle with a perimeter of the same length as the district's. *Id*. at 283 nn.7–8. The following images illustrate the application of these measures to a hypothetical district:[2]



Reock **Convex Hull** **Polsby-Popper**

Districts 7, 13, and 14 all sport robust compactness scores. They easily hold their own in a comparison with the mean scores in both the enacted and benchmark congressional maps

[2] These numerical measures are only guides, and are not dispositive. Each is calculated differently; their results often diverge from each other, and sometimes from common sense. For example, because it has no concavities, a rectangle one inch long and thousands of miles wide will receive a perfect Convex Hull score. Nevertheless, despite the imperfections in any mathematical compactness measure, the compactness scores support what is obvious from a visual examination: Districts 7, 13, and 14 satisfy the constitutional standard of compactness.

and the state-legislative maps for State House and Senate districts, which the Florida Supreme Court unanimously upheld:

	Reock	**Convex Hull**	**Polsby-Popper**
District 7	0.47	0.83	0.40
District 13	0.51	0.93	0.58
District 14	0.48	0.83	0.47
Enacted Congressional Plan (Mean)	0.47	0.81	0.43
Benchmark Congressional Plan (Mean)	0.44	0.77	0.36
Approved House Plan (Mean)	0.45	0.82	0.45
Approved Senate Plan (Mean)	0.46	0.82	0.46

In fact, District 13 has the second highest Convex Hull score, the third highest Polsby-Popper score, and the eighth highest Reock score among all twenty-eight districts in the congressional map—which underscores the weakness of Plaintiffs' compactness challenge and the propriety of summary judgment.

Districts 7, 13, and 14 are visually and mathematically compact while balancing other constitutional priorities, including adherence to existing boundaries. None of the districts has bizarre fingers or appendages or other unusual shapes. Each is comparable in compactness to many of the state-legislative districts that the Florida Supreme Court recently determined to be compact. Because Districts 7, 13, and 14 are not bizarrely shaped or illogically drawn, they are compact, and the Court should grant summary judgment in Defendants' favor as to Count IV.

CONCLUSION

For these reasons, Defendants request that the Court enter summary judgment in their favor as to Counts IV and V.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on August 25, 2022, the foregoing motion was furnished by email to all individuals identified on the Service List that follows.

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APPENDIX TO DEFENDANTS'
MOTION FOR PARTIAL SUMMARY JUDGMENT

Tab A.....2022 Enacted Congressional Districts – Maps and Data

Tab B..... 2022 Approved State House Districts – Maps and Data

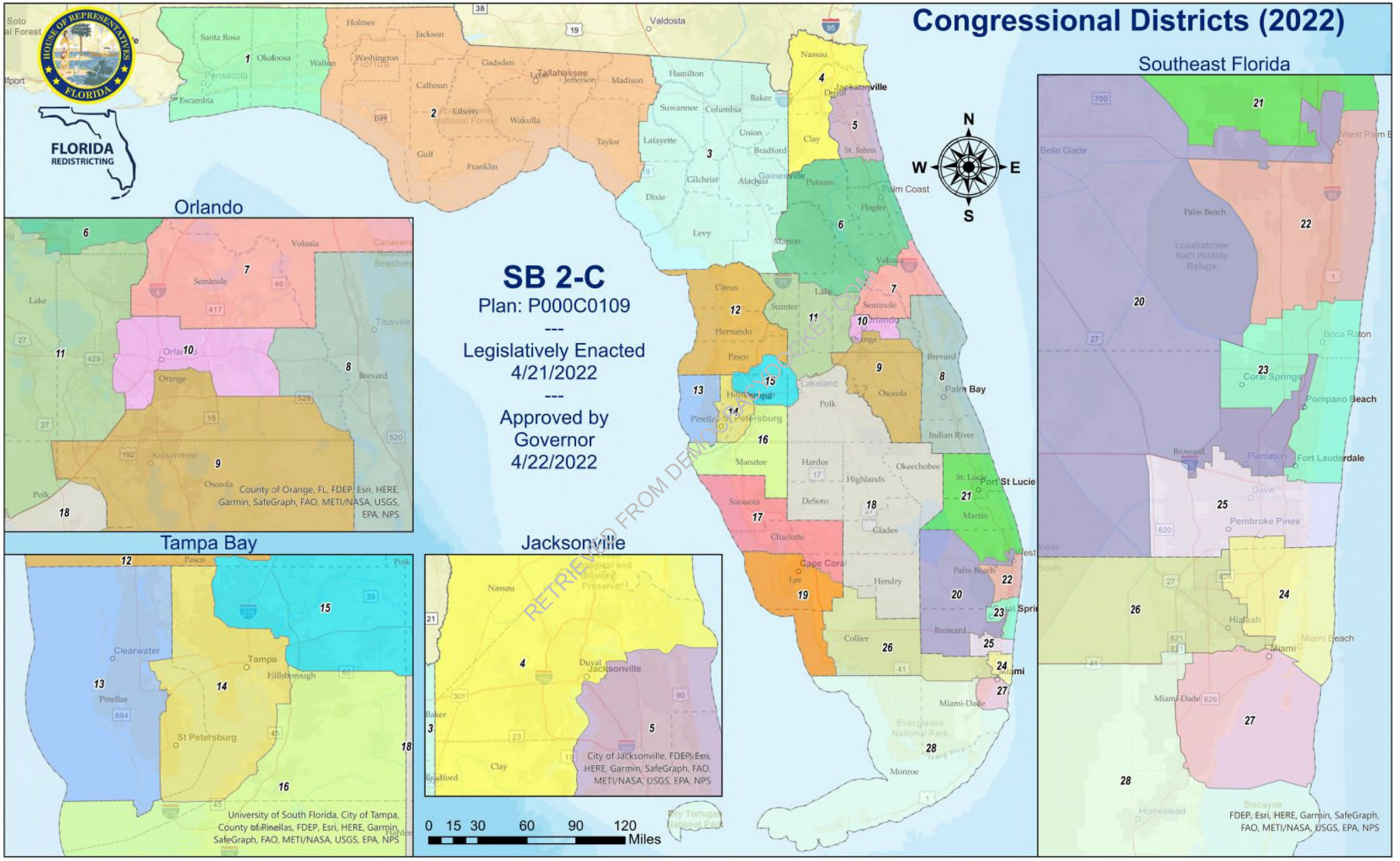
Tab C.....2022 Approved State Senate Districts – Maps and Data

Tab D .....2015 Benchmark Congressional Districts – Maps and Data

Tab A

2022 Enacted Congressional Districts

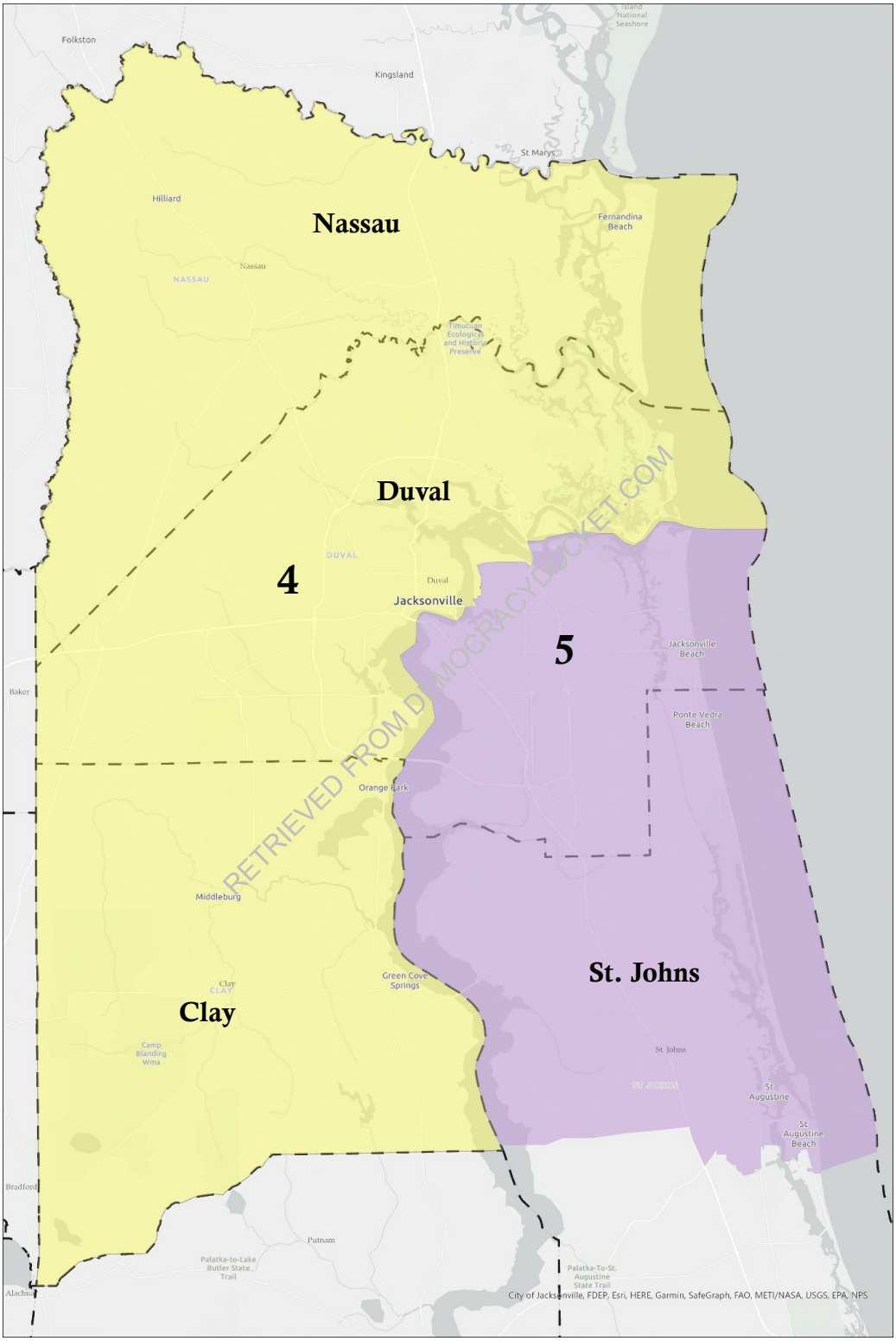
Maps and Data



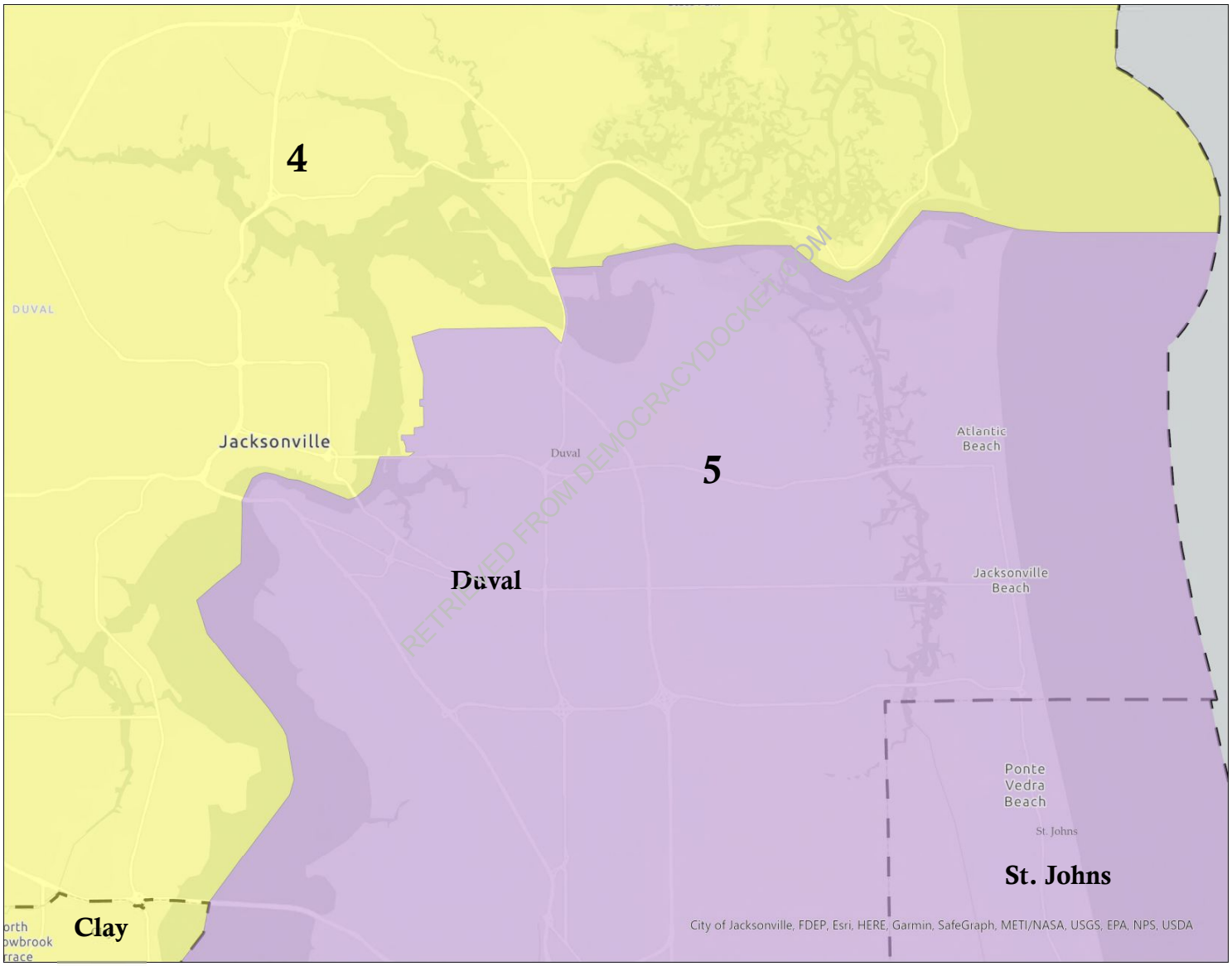
ENACTED CONGRESSIONAL MAP (P000C0109)					
STATEWIDE SNAPSHOT					
Total State Population:	21,538,187			**Mean Reock Score**	**Median Reock Score**
Ideal District Population:	769,221			0.47	0.48
Mean Deviation:	0	0.00%		**Mean Convex Hull Score**	**Median Convex Hull Score**
Max Deviation:	0	0.00%		0.81	0.82
Min Deviation:	-1	0.00%		**Mean Polsby-Popper Score**	**Median Polsby-Popper Score**
Overall Deviation Range:	1	0.00%		0.43	0.44

DISTRICT BREAKDOWN					
District	**Population**		**Compactness**		
	Total Population	**Deviation From Ideal Population**	**Reock**	**Convex Hull**	**Polsby-Popper**
1	769221	0	0.54	0.87	0.48
2	769221	0	0.46	0.82	0.48
3	769221	0	0.57	0.90	0.50
4	769221	0	0.38	0.76	0.32
5	769221	0	0.56	0.89	0.52
6	769221	0	0.74	0.92	0.48
7	769221	0	0.47	0.83	0.40
8	769221	0	0.32	0.78	0.45
9	769221	0	0.49	0.86	0.47
10	769221	0	0.41	0.75	0.37
11	769221	0	0.52	0.82	0.36
12	769221	0	0.45	0.75	0.38
13	769221	0	0.51	0.93	0.58
14	769221	0	0.48	0.83	0.47
15	769221	0	0.58	0.88	0.58
16	769221	0	0.45	0.73	0.45
17	769221	0	0.28	0.77	0.39
18	769221	0	0.42	0.82	0.42
19	769221	0	0.33	0.78	0.39
20	769221	0	0.50	0.77	0.28
21	769221	0	0.50	0.82	0.49
22	769220	-1	0.44	0.74	0.42
23	769221	0	0.50	0.79	0.29
24	769221	0	0.48	0.90	0.48
25	769221	0	0.42	0.81	0.38
26	769221	0	0.29	0.77	0.33
27	769221	0	0.71	0.95	0.73
28	769221	0	0.22	0.55	0.24

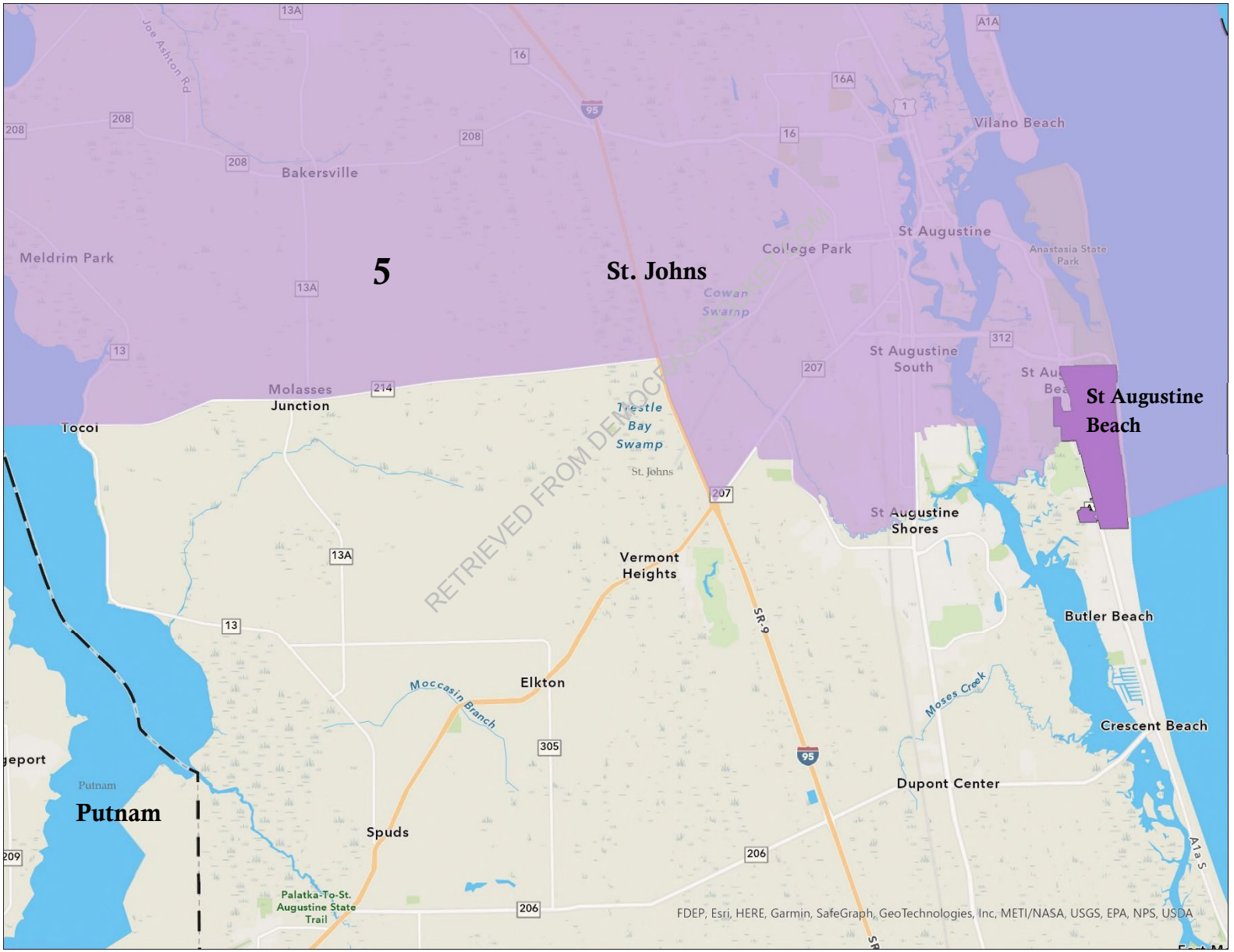
Congressional Districts 4 and 5



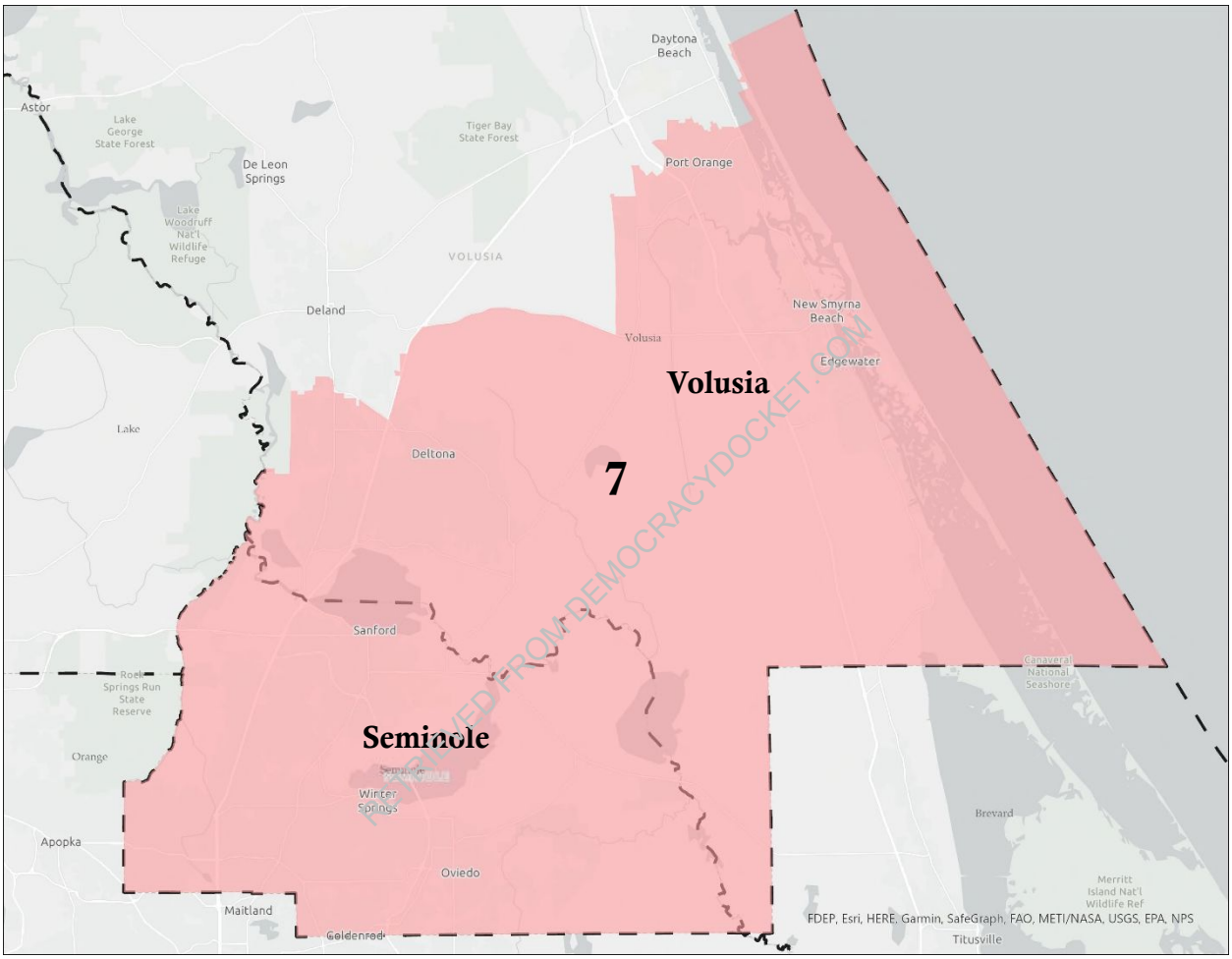
Congressional Districts 4 and 5



Congressional District 5 – Southern Boundary in St. Johns County



Congressional District 7



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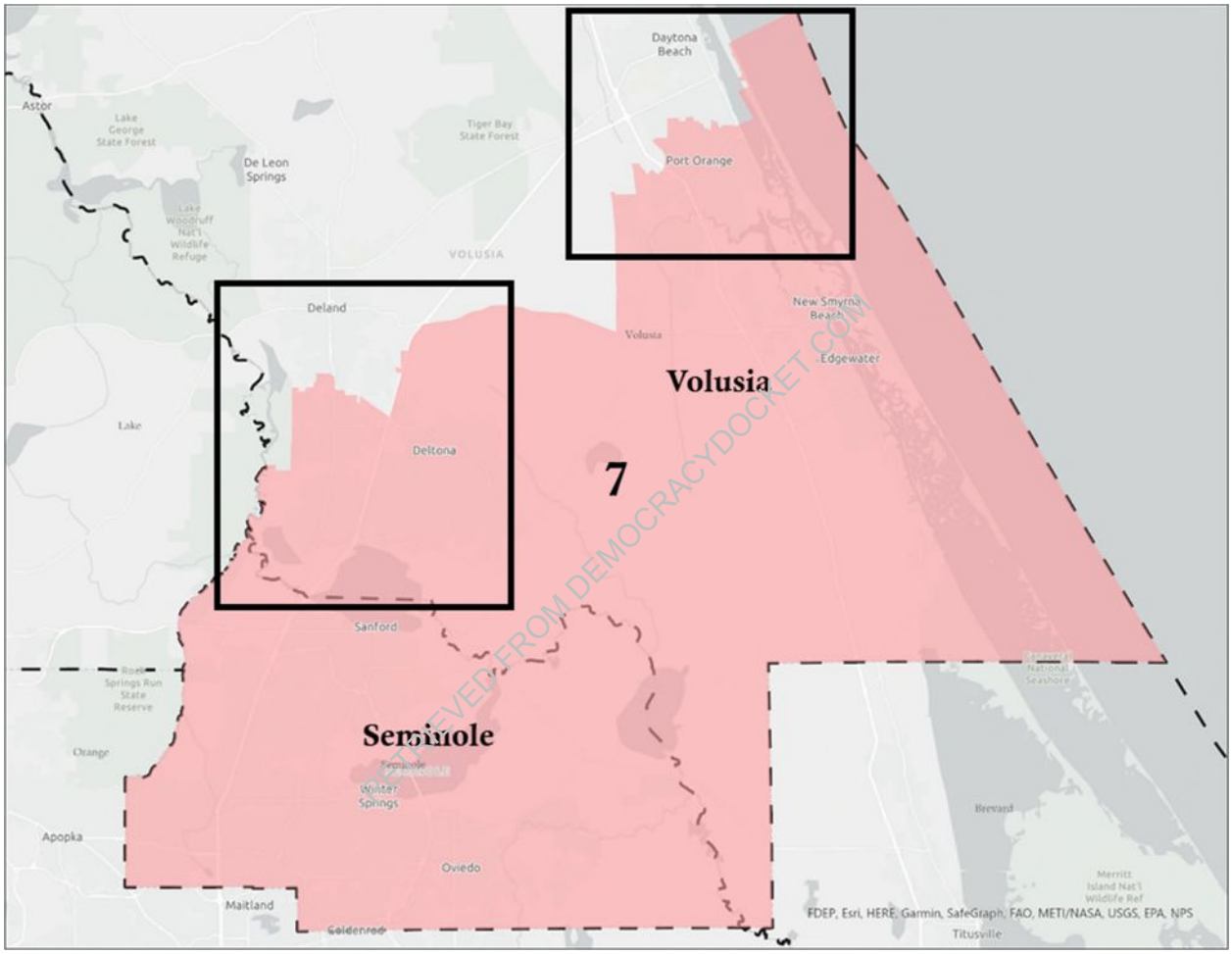
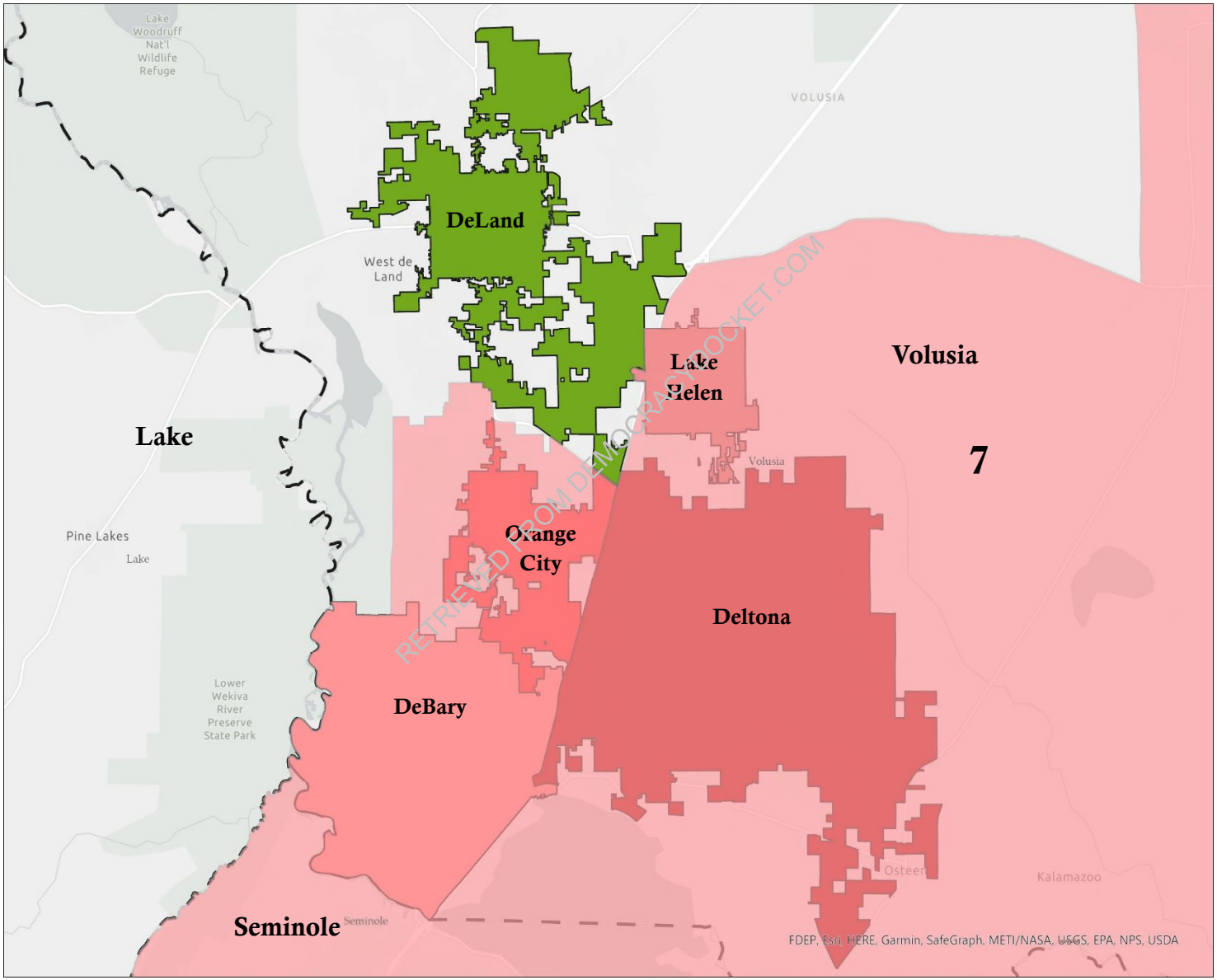
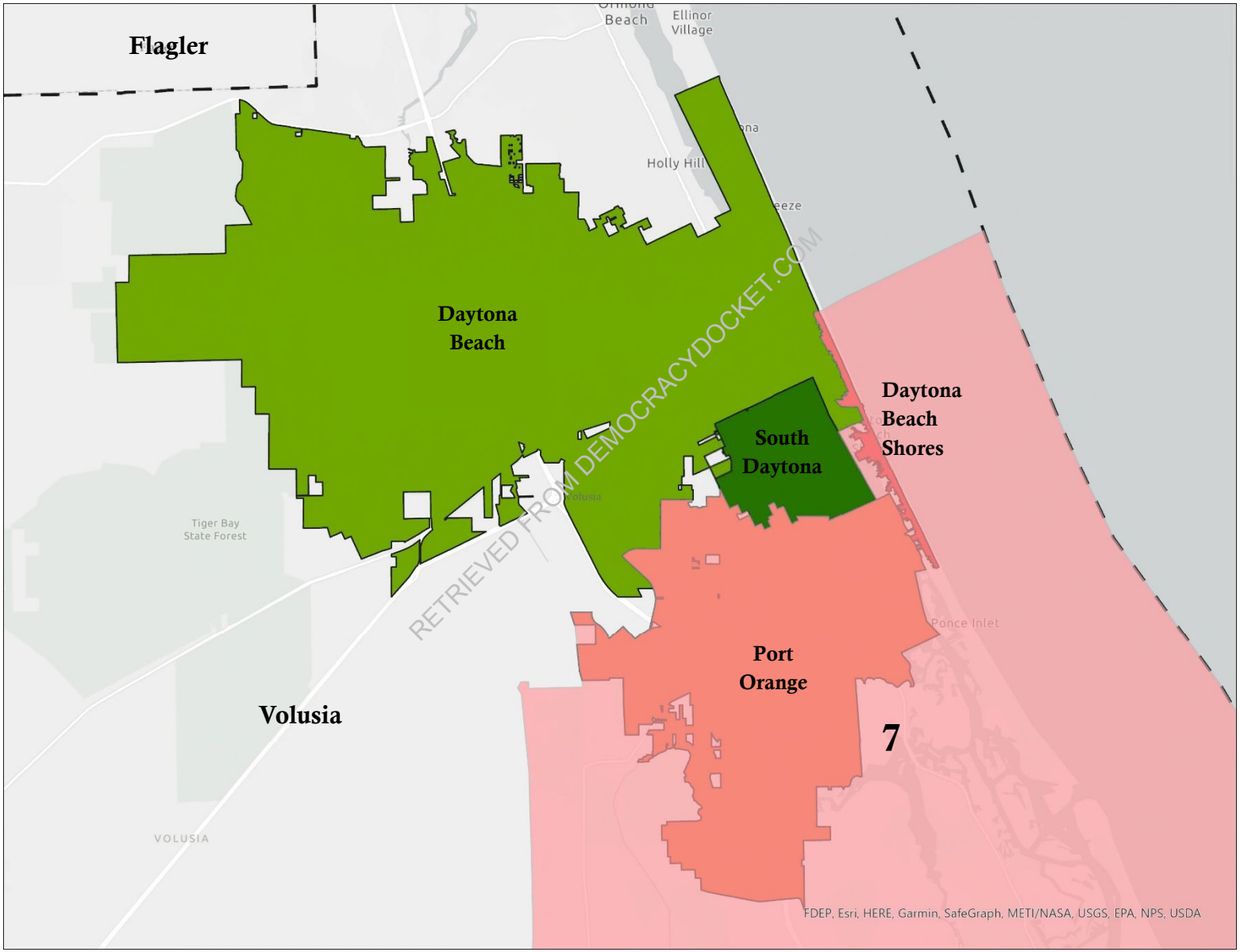


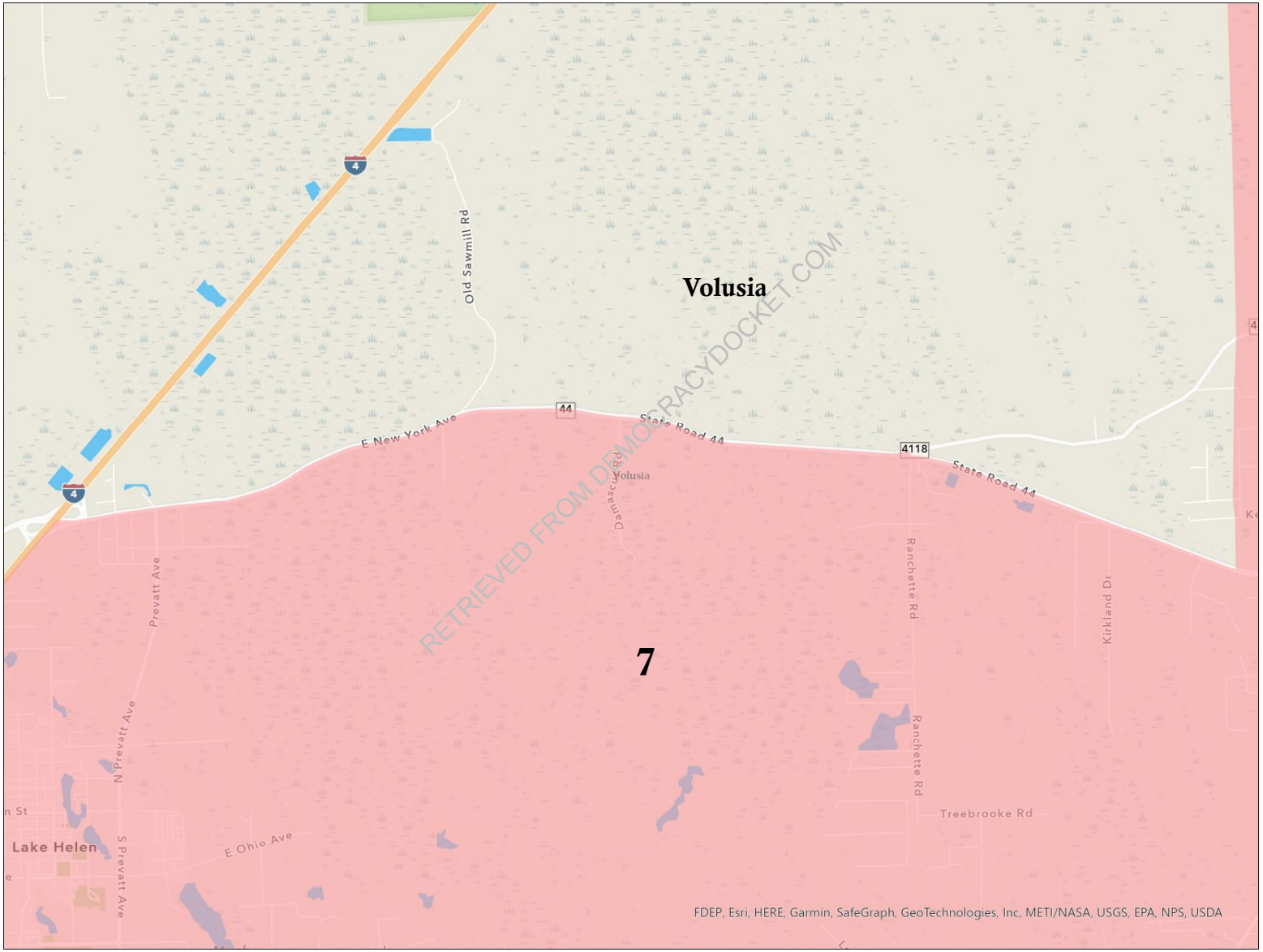
Congressional District 7



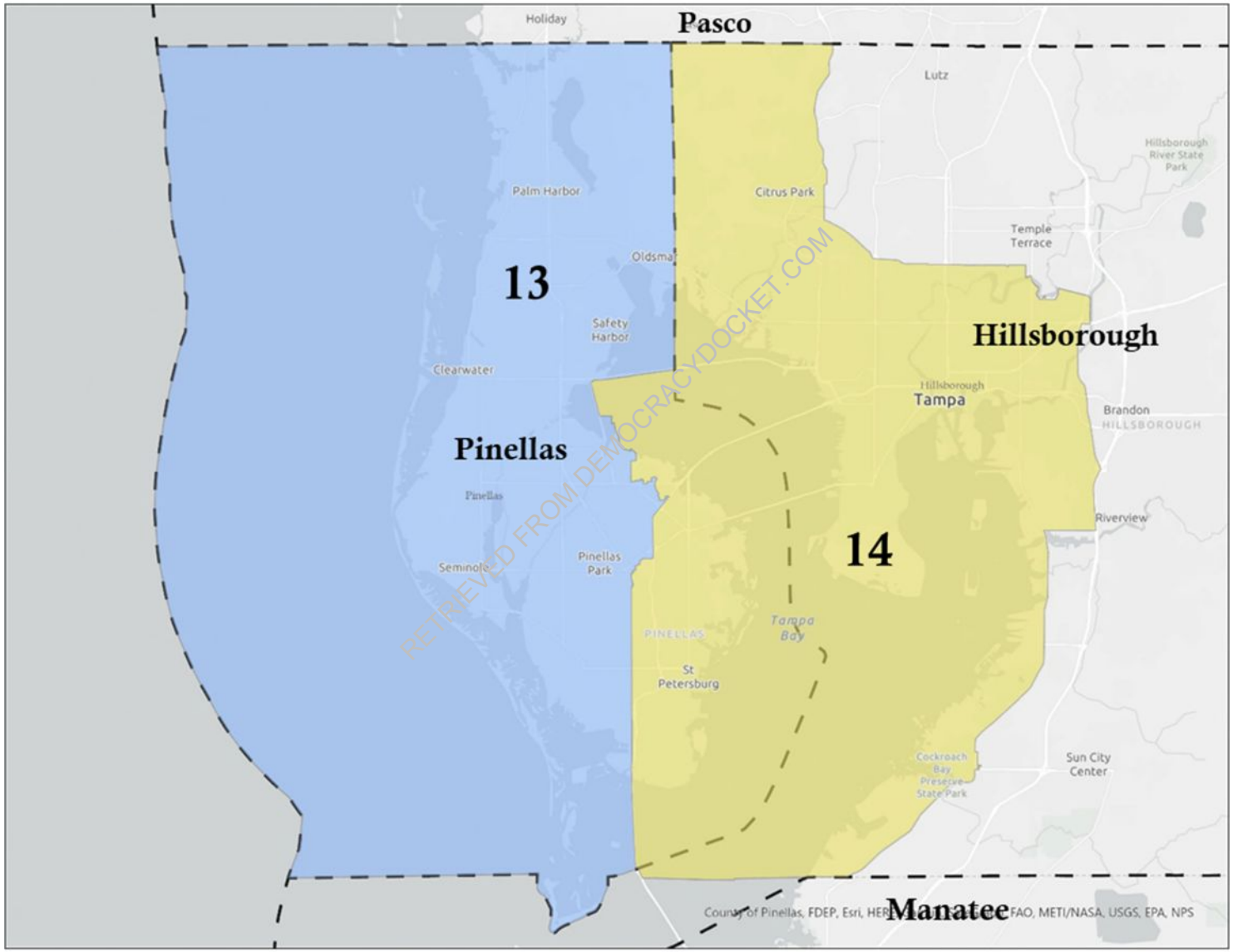
Congressional District 7



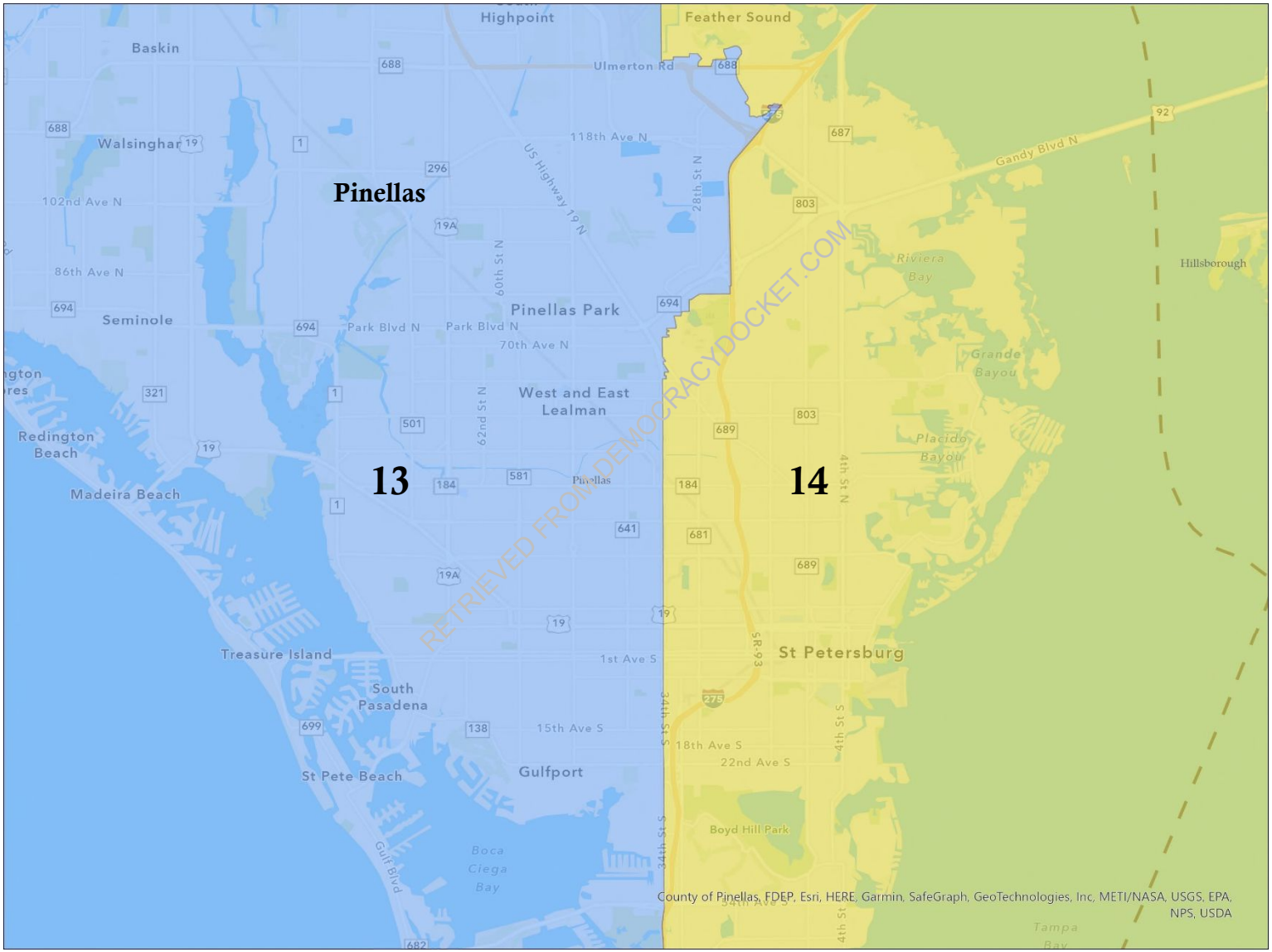
Congressional District 7 – Northern Boundary in Volusia County



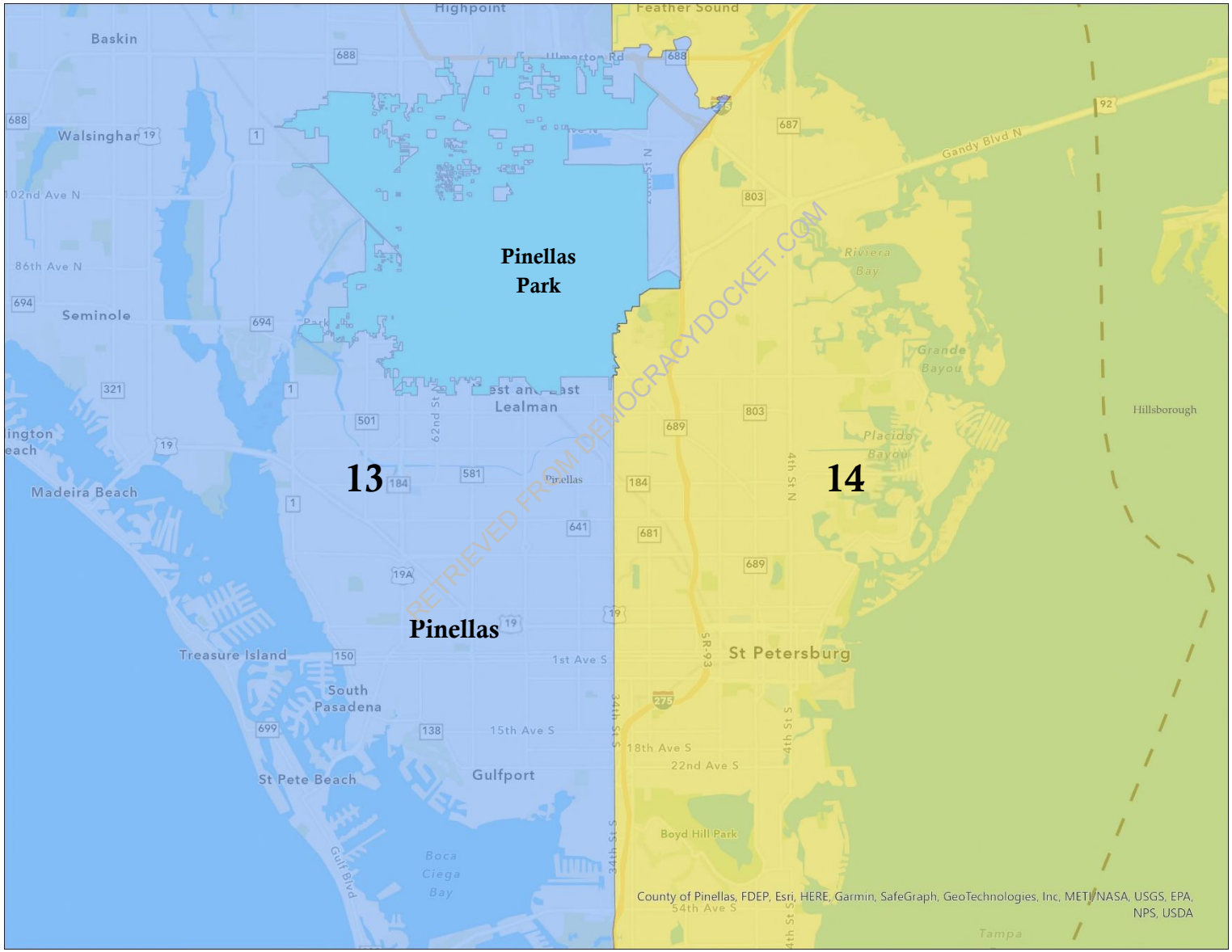
Congressional Districts 13 and 14



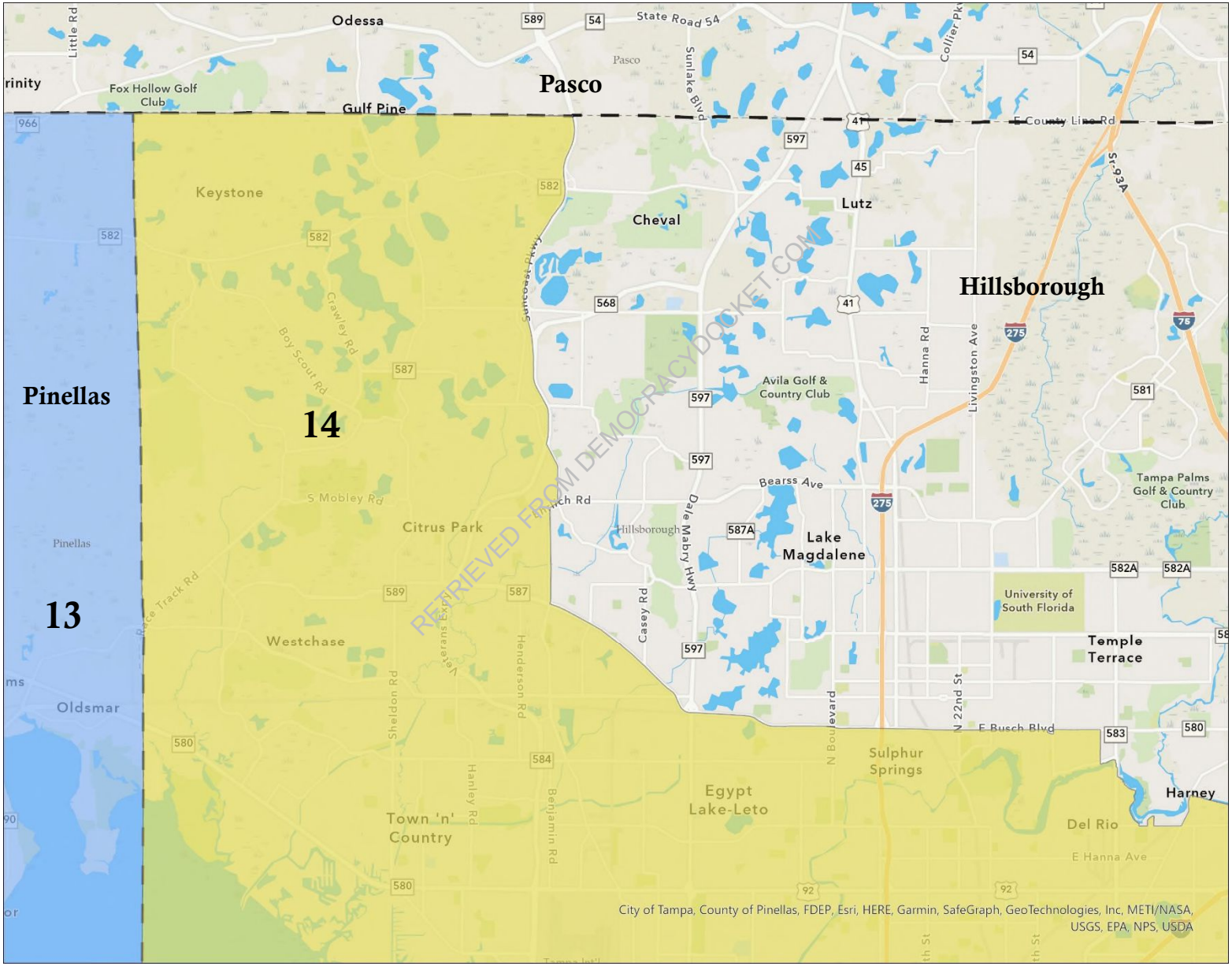
Congressional Districts 13 and 14



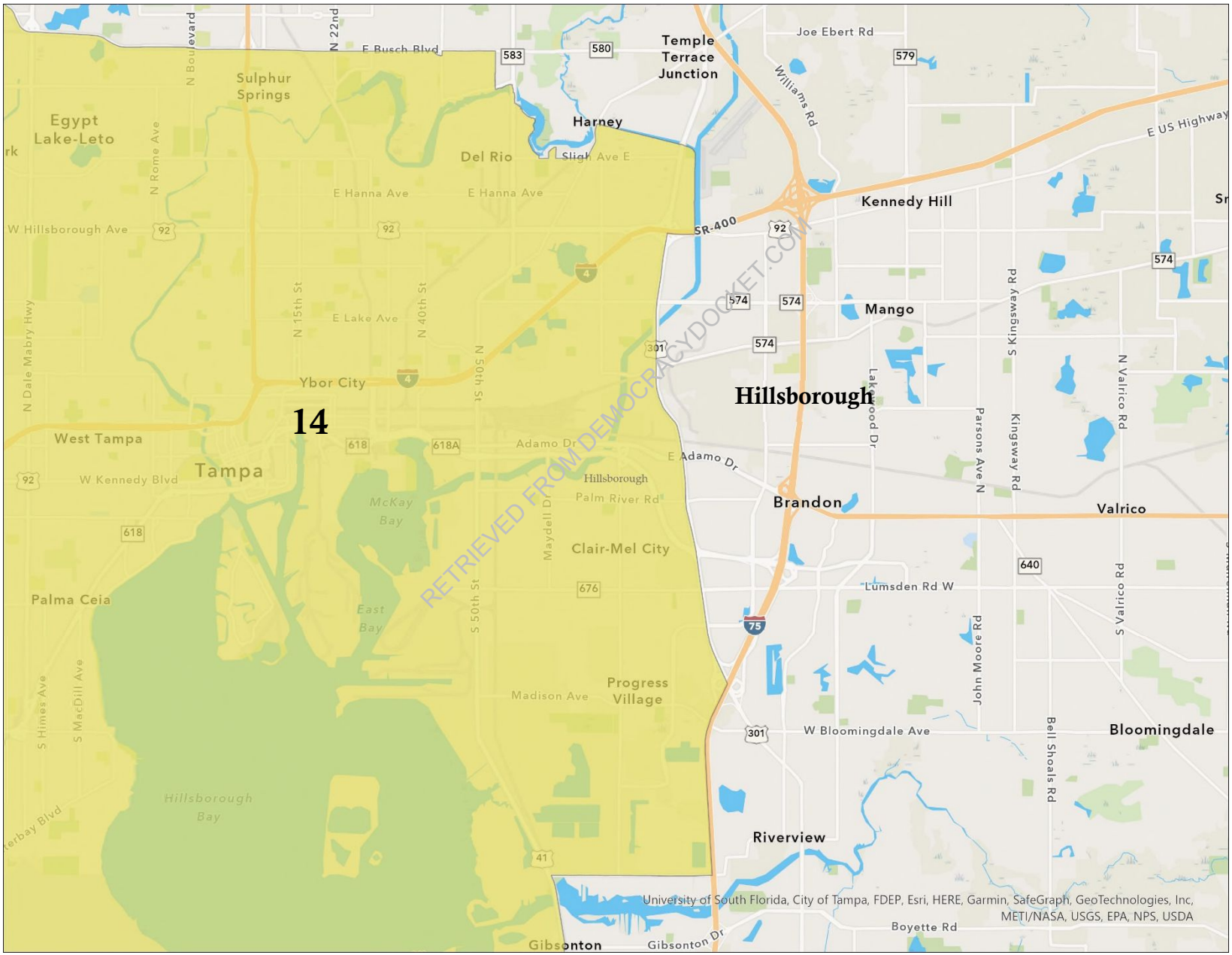
Congressional Districts 13 and 14



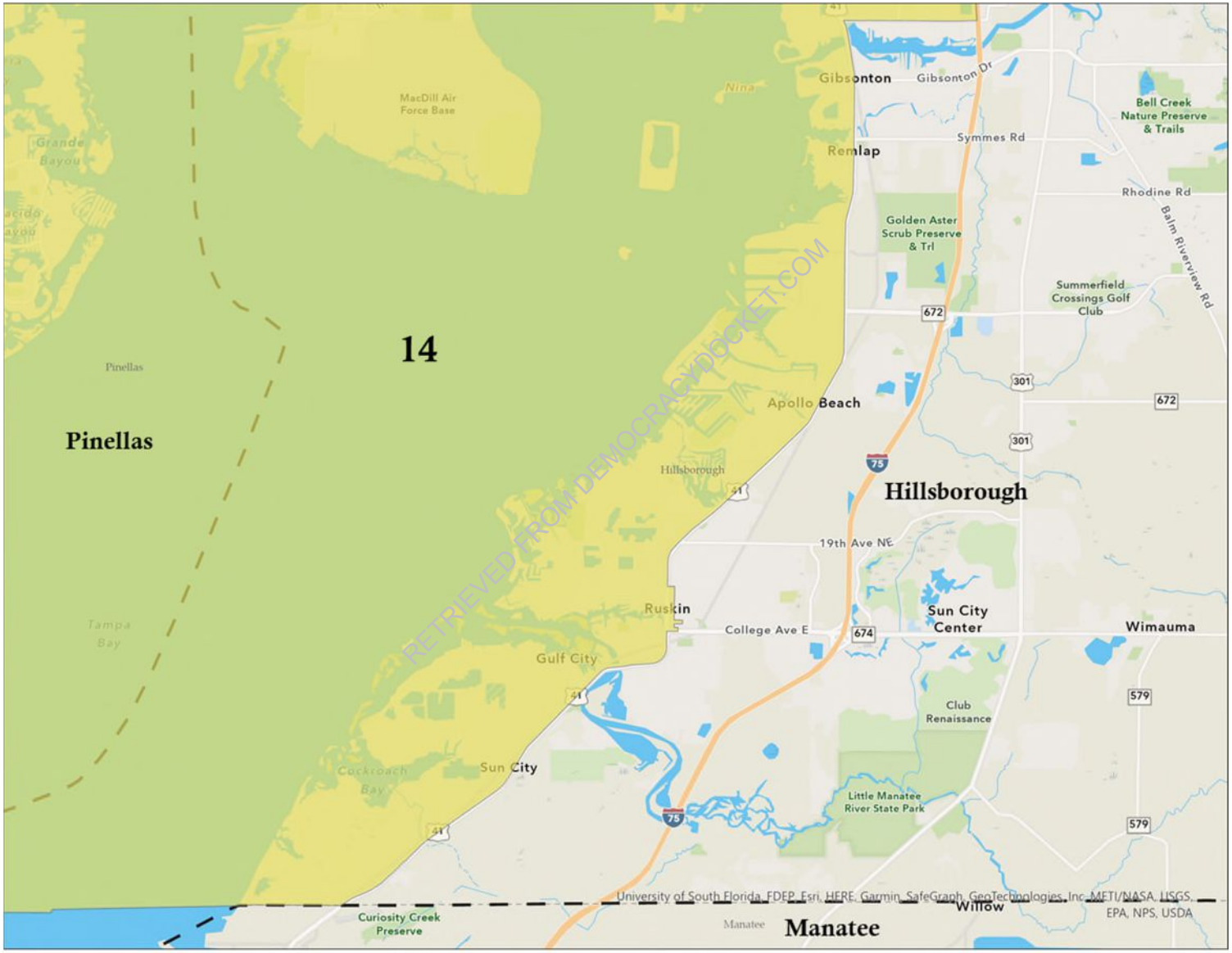
Congressional District 14



Congressional District 14



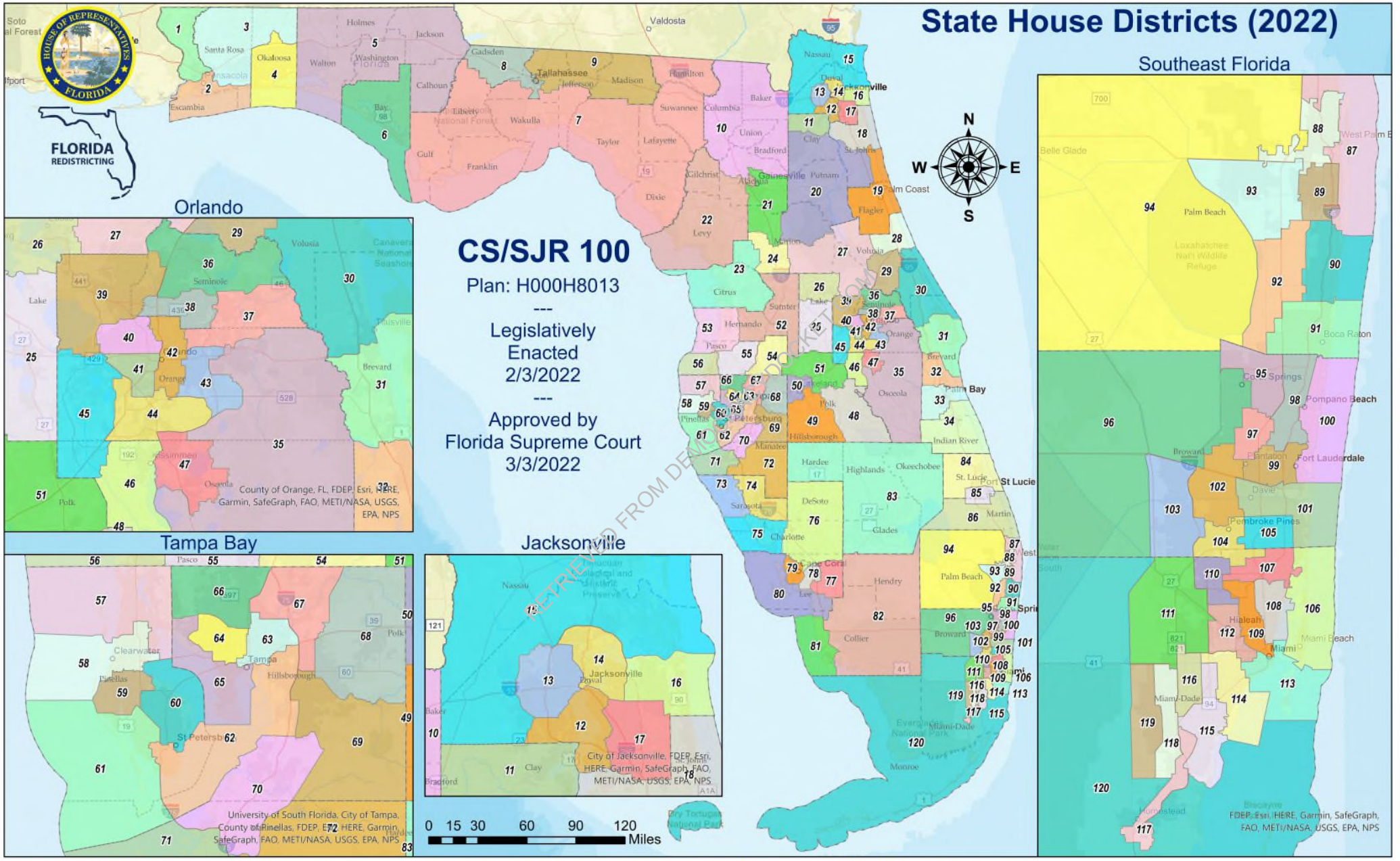
Congressional District 14



Tab B

2022 Approved State House Districts

Maps and Data



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ENACTED STATE HOUSE MAP (H000H8013)

STATEWIDE SNAPSHOT

Total State Population:	21,538,187			**Mean Reock Score**	**Median Reock Score**
Ideal District Population:	179,485			0.45	0.46
Mean Deviation:	2850	1.59%		**Mean Convex Hull Score**	**Median Convex Hull Score**
Max Deviation:	4252	2.37%		0.82	0.83
Min Deviation:	-4269	-2.38%		**Mean Polsby Popper Score**	**Median Polsby-Popper Score**
Overall Deviation Range:	8521	4.75%		0.45	0.45

DISTRICT BREAKDOWN

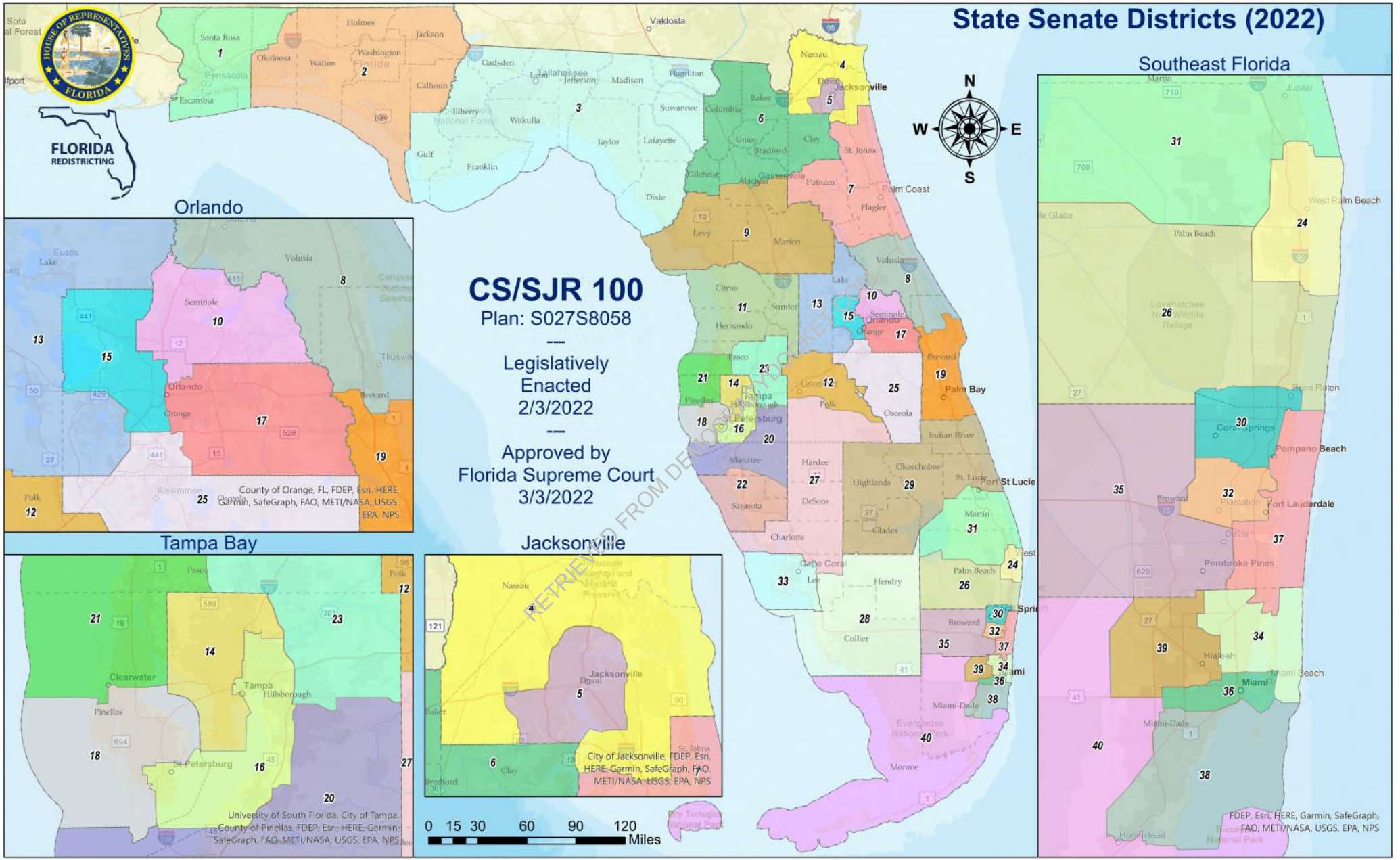
District	Population		Compactness		
	Total Population	Deviation From Ideal Population	Reock	Convex Hull	Polsby-Popper
1	178511	-974	0.37	0.64	0.24
2	180797	1312	0.40	0.86	0.44
3	178528	-957	0.53	0.82	0.41
4	183737	4252	0.53	0.93	0.61
5	181243	1758	0.52	0.82	0.41
6	175216	-4269	0.33	0.80	0.45
7	182734	3249	0.36	0.67	0.24
8	175555	-3930	0.38	0.72	0.23
9	182853	3368	0.34	0.88	0.33
10	180867	1382	0.56	0.91	0.42
11	177922	-1563	0.48	0.93	0.58
12	181072	1587	0.50	0.75	0.43
13	183002	3517	0.73	0.93	0.68
14	176278	-3207	0.48	0.85	0.59
15	182272	2787	0.47	0.74	0.30
16	180047	562	0.52	0.86	0.59
17	183248	3763	0.57	0.92	0.64
18	180300	815	0.52	0.79	0.46
19	175457	-4028	0.38	0.75	0.40
20	175874	-3611	0.57	0.85	0.44
21	176405	-3080	0.41	0.83	0.33
22	183529	4044	0.53	0.79	0.38
23	176178	-3307	0.36	0.70	0.37
24	175595	-3890	0.43	0.77	0.36
25	176494	-2991	0.57	0.95	0.59
26	177279	-2206	0.58	0.92	0.53
27	183145	3660	0.52	0.76	0.36
28	178466	-1019	0.56	0.79	0.43
29	176556	-2929	0.56	0.80	0.40
30	181596	2111	0.40	0.85	0.37
31	179252	-233	0.50	0.82	0.44
32	178737	-748	0.40	0.82	0.42
33	183186	3701	0.48	0.83	0.43
34	178835	-650	0.55	0.91	0.59
35	176404	-3081	0.42	0.84	0.26
36	175313	-4172	0.37	0.73	0.32
37	175353	-4132	0.37	0.78	0.37
38	175442	-4043	0.37	0.79	0.36
39	175326	-4159	0.49	0.89	0.49
40	175326	-4159	0.53	0.92	0.56
41	176364	-3121	0.45	0.87	0.58
42	180528	1043	0.36	0.78	0.33
43	175629	-3856	0.55	0.72	0.37
44	175329	-4156	0.40	0.79	0.42
45	175973	-3512	0.47	0.93	0.52
46	176200	-3285	0.44	0.81	0.48
47	176233	-3252	0.54	0.77	0.36
48	183593	4108	0.40	0.84	0.27
49	178192	-1293	0.53	0.92	0.48
50	180902	1417	0.50	0.83	0.39
51	182359	2874	0.46	0.77	0.30
52	182726	3241	0.45	0.70	0.34
53	175358	-4127	0.54	0.88	0.64
54	176277	-3208	0.45	0.89	0.59
55	175430	-4055	0.47	0.92	0.65
56	176367	-3118	0.51	0.94	0.69
57	177343	-2142	0.43	0.87	0.47
58	175888	-3597	0.39	0.80	0.37
59	178235	-1250	0.56	0.87	0.44
60	175492	-3993	0.54	0.87	0.50

District	Population		Compactness		
	Total Population	Deviation From Ideal Population	Reock	Convex Hull	Polsby-Popper
61	175321	-4164	0.52	0.88	0.59
62	176028	-3457	0.26	0.66	0.28
63	175559	-3926	0.49	0.78	0.47
64	175706	-3779	0.58	0.86	0.59
65	176912	-2573	0.33	0.69	0.38
66	175639	-3846	0.47	0.90	0.61
67	177964	-1521	0.46	0.76	0.46
68	175705	-3780	0.61	0.96	0.62
69	175349	-4136	0.48	0.82	0.45
70	175478	-4007	0.39	0.83	0.47
71	175460	-4025	0.44	0.89	0.57
72	176500	-2985	0.48	0.80	0.48
73	183473	3988	0.39	0.90	0.55
74	183447	3962	0.37	0.80	0.45
75	183275	3790	0.46	0.91	0.63
76	181871	2386	0.58	0.93	0.62
77	183022	3537	0.61	0.88	0.45
78	183124	3639	0.45	0.81	0.40
79	183355	3870	0.55	0.88	0.49
80	183411	3926	0.35	0.79	0.43
81	182510	3025	0.45	0.90	0.62
82	183534	4049	0.47	0.88	0.55
83	178332	-1153	0.53	0.84	0.57
84	183408	3923	0.50	0.88	0.60
85	182082	2597	0.55	0.91	0.50
86	179269	-216	0.31	0.77	0.37
87	182880	3395	0.26	0.76	0.26
88	175984	-3501	0.30	0.57	0.12
89	177515	-1970	0.55	0.89	0.54
90	179439	-46	0.61	0.91	0.60
91	180714	1229	0.50	0.92	0.60
92	179284	-201	0.30	0.75	0.38
93	180537	1052	0.45	0.88	0.51
94	178736	-749	0.60	0.94	0.55
95	181346	1861	0.39	0.78	0.45
96	180503	1018	0.52	0.91	0.57
97	181456	1971	0.55	0.88	0.51
98	183663	4178	0.30	0.72	0.35
99	180790	1305	0.45	0.83	0.43
100	182865	3380	0.37	0.89	0.51
101	179020	-465	0.41	0.80	0.47
102	183490	4005	0.57	0.86	0.50
103	182670	3185	0.44	0.87	0.57
104	176085	-3400	0.45	0.70	0.35
105	183727	4242	0.53	0.94	0.65
106	180735	1250	0.40	0.91	0.39
107	183505	4020	0.34	0.75	0.29
108	181345	1860	0.48	0.85	0.45
109	183366	3881	0.25	0.73	0.33
110	178199	-1286	0.42	0.79	0.47
111	182977	3492	0.59	0.88	0.56
112	179362	-123	0.42	0.79	0.42
113	182742	3257	0.55	0.77	0.39
114	181962	2477	0.35	0.73	0.35
115	183386	3901	0.28	0.72	0.30
116	182984	3499	0.35	0.88	0.51
117	182260	2775	0.15	0.45	0.17
118	183694	4209	0.22	0.79	0.33
119	183655	4170	0.28	0.92	0.47
120	183229	3744	0.22	0.54	0.20

Tab C

2022 Approved State Senate Districts

Maps and Data



Map Produced by staff of the Florida House of Representatives Redistricting Committee

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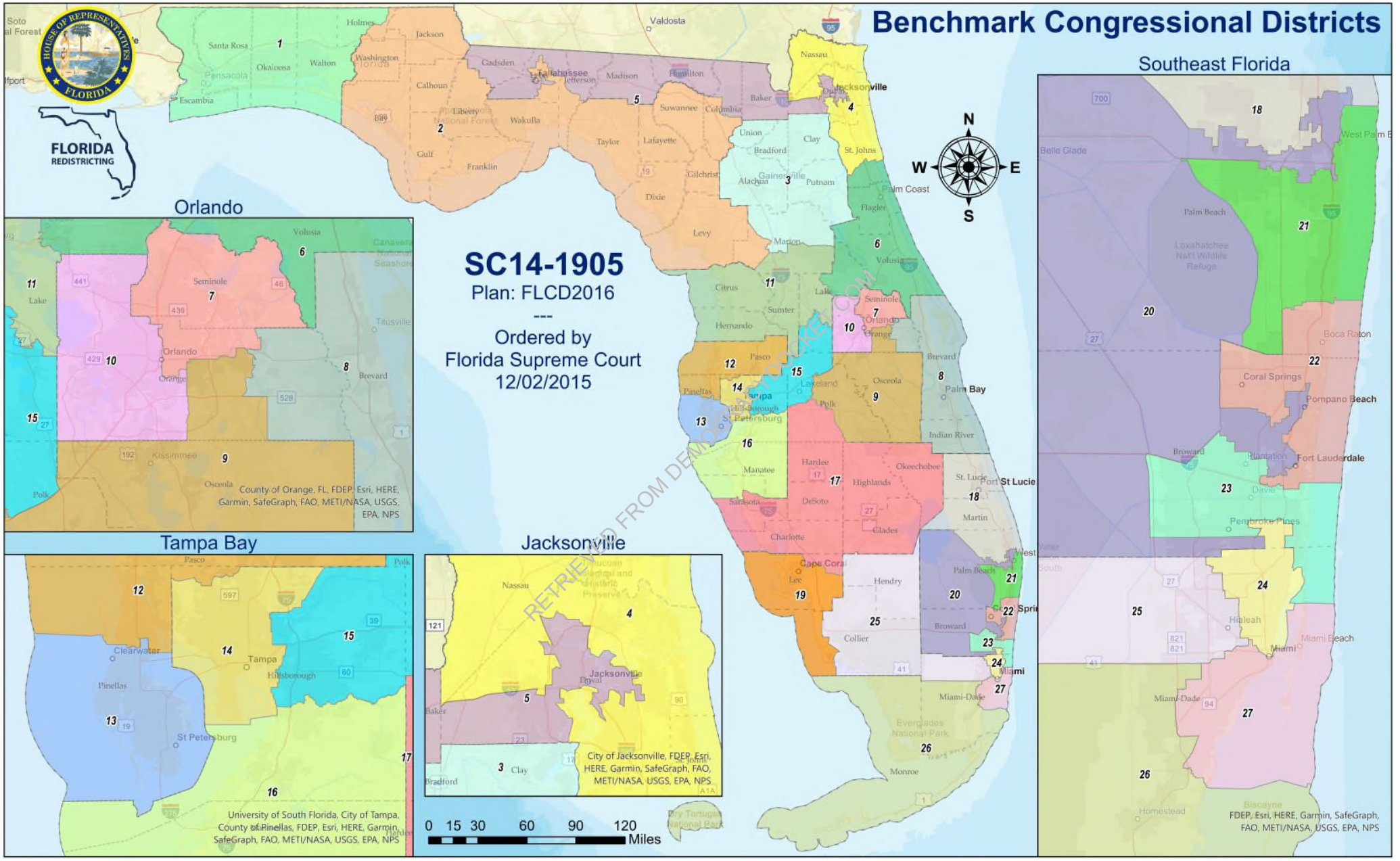
ENACTED STATE SENATE MAP (S027S8058)					
STATEWIDE SNAPSHOT					
Total State Population:	21,538,187			**Mean Reock Score**	**Median Reock Score**
Ideal District Population:	538,455			0.46	0.47
Mean Deviation:	2955	0.55%		**Mean Convex Hull Score**	**Median Convex Hull Score**
Max Deviation:	5219	0.97%		0.82	0.83
Min Deviation:	-5143	-0.96%		**Mean Polsby-Popper Score**	**Median Polsby-Popper Score**
Overall Deviation Range:	10362	1.92%		0.46	0.44

DISTRICT BREAKDOWN					
District	**Population**		**Compactness**		
	Total Population	**Deviation From Ideal Population**	**Reock**	**Convex Hull**	**Polsby-Popper**
1	539263	808	0.42	0.81	0.38
2	538769	314	0.50	0.78	0.45
3	541142	2687	0.44	0.80	0.42
4	542508	4053	0.52	0.74	0.24
5	543411	4956	0.60	0.87	0.66
6	538821	366	0.50	0.83	0.38
7	541606	3151	0.49	0.79	0.40
8	543176	4721	0.37	0.83	0.35
9	536986	-1469	0.44	0.89	0.44
10	535435	-3020	0.50	0.81	0.39
11	538539	84	0.39	0.75	0.39
12	536474	-1981	0.32	0.78	0.29
13	536634	-1821	0.36	0.72	0.32
14	535992	-2463	0.47	0.78	0.44
15	534207	-4248	0.45	0.82	0.46
16	535448	-3007	0.36	0.69	0.36
17	533788	-4667	0.52	0.94	0.49
18	542722	4267	0.63	0.86	0.53
19	537497	-958	0.42	0.77	0.40
20	535067	-3388	0.41	0.72	0.42
21	535205	-3250	0.55	0.89	0.64
22	533476	-4979	0.49	0.92	0.67
23	536137	-2318	0.56	0.86	0.55
24	543535	5080	0.53	0.91	0.63
25	533312	-5143	0.43	0.84	0.37
26	540142	1687	0.45	0.88	0.54
27	534545	-3910	0.40	0.60	0.32
28	537495	-960	0.48	0.83	0.48
29	535749	-2706	0.49	0.83	0.56
30	539428	973	0.53	0.91	0.60
31	540900	2445	0.60	0.90	0.63
32	542051	3596	0.59	0.88	0.48
33	538875	420	0.46	0.94	0.68
34	533571	-4884	0.46	0.81	0.37
35	542250	3795	0.54	0.94	0.65
36	540685	2230	0.28	0.82	0.43
37	542618	4163	0.29	0.79	0.31
38	543674	5219	0.43	0.85	0.52
39	534522	-3933	0.58	0.90	0.63
40	542532	4077	0.22	0.54	0.22

Tab D

2015 Benchmark Congressional Districts

Maps and Data



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BENCHMARK CONGRESSIONAL MAP					
STATEWIDE SNAPSHOT					
Total State Population:	21,538,187			**Mean Reock Score**	**Median Reock Score**
Ideal District Population:	769,221			0.44	0.44
Mean Deviation:	28,490	3.70%		**Median Convex Hull Score**	**Median Convex Hull Score**
Max Deviation:	186,381	24.23%		0.77	0.77
Min Deviation:	-41,756	-5.43%		**Median Polsby-Popper Score**	**Median Polsby-Popper Score**
Overall Deviation Range:	228,137	29.66%		0.36	0.37

DISTRICT BREAKDOWN

District	Compactness		
	Reock	Convex Hull	Polsby-Popper
1	0.40	0.82	0.40
2	0.31	0.68	0.21
3	0.71	0.89	0.53
4	0.37	0.72	0.17
5	0.12	0.71	0.10
6	0.44	0.77	0.34
7	0.57	0.81	0.37
8	0.34	0.76	0.41
9	0.63	0.87	0.46
10	0.49	0.89	0.49
11	0.42	0.74	0.29
12	0.38	0.82	0.46
13	0.66	0.93	0.68
14	0.48	0.82	0.45
15	0.33	0.76	0.26
16	0.58	0.90	0.53
17	0.51	0.77	0.44
18	0.50	0.82	0.45
19	0.34	0.79	0.40
20	0.48	0.75	0.20
21	0.37	0.64	0.29
22	0.46	0.73	0.22
23	0.35	0.65	0.25
24	0.47	0.77	0.30
25	0.41	0.68	0.36
26	0.22	0.55	0.24
27	0.50	0.88	0.48